



City of Westminster

Committee Agenda

Title: **Housing, Finance and Regeneration Policy and Scrutiny Committee**

Meeting Date: **Tuesday 17th March, 2020**

Time: **7.00 pm**

Venue: **Room 18.08, 18th Floor, City Hall, 64 Victoria Street, London, SW1E 6QP**

Members: **Councillors:**

Lorraine Dean
Murad Gassanly
Adam Hug
Guthrie McKie

Gotz Mohindra
Matt Noble
Emily Payne

Members of the public are welcome to attend the meeting and listen to the discussion Part 1 of the Agenda

Admission to the public gallery is by ticket, issued from the ground floor reception. If you have a disability and require any special assistance please contact the Committee Officer (details listed below) in advance of the meeting.



An Induction loop operates to enhance sound for anyone wearing a hearing aid or using a transmitter. If you require any further information, please contact the Committee Officer, Toby Howes, Senior Committee and Governance Officer.

**Tel: 07815 663854; Email: thowes@westminster.gov.uk
Corporate Website: www.westminster.gov.uk**

Note for Members: Members are reminded that Officer contacts are shown at the end of each report and Members are welcome to raise questions in advance of the meeting. With regard to item 2, guidance on declarations of interests is included in the Code of Governance; if Members and Officers have any particular questions they should contact the Head of Committee and Governance Services in advance of the meeting please.

AGENDA

PART 1 (IN PUBLIC)

1. ELECTION OF CHAIRMAN/MEMBERSHIP

To elect the Chairman of the Housing, Finance and Regeneration Policy and Scrutiny Committee and to note any changes to the membership.

2. DECLARATIONS OF INTEREST

To receive declarations of interest by Members and Officers of any pecuniary Interest or any other significant interest in matters on this agenda.

3. MINUTES

To approve the minutes of the Housing, Finance and Regeneration Policy and Scrutiny Committee for the meeting held on 18 November 2020.

(Pages 5 - 12)

4. CABINET MEMBER FOR FINANCE, PROPERTY AND REGENERATION UPDATE

Councillor Melvyn Caplan (Cabinet Member for Finance, Property and Regeneration) to update the Committee on current and forthcoming issues in his portfolio.

(Pages 13 - 16)

5. CABINET MEMBER FOR HOUSING SERVICES UPDATE

Councillor David Harvey (Cabinet Member for Housing Services) to update the Committee on current and forthcoming issues in his portfolio.

Report to follow.

6. FIRE SAFETY UPDATE

The report is attached.

(Pages 17 - 26)

7. CALL-IN OF: WESTMINSTER HOMELESSNESS STRATEGY 2019-2024

(Pages 27 - 146)

Report of the Executive Director of Growth, Planning and Housing.

8. WORK PROGRAMME AND ACTION TRACKER

(Pages 147 - 152)

The Work Programme for 2019-2020 and the Action Tracker are attached.

9. ANY OTHER BUSINESS THE CHAIRMAN CONSIDERS URGENT

To consider any other business which the Chairman considers urgent.

**Stuart Love
Chief Executive
9 March 2020**

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CITY OF WESTMINSTER

MINUTES

Housing, Finance and Regeneration Policy and Scrutiny Committee

MINUTES OF PROCEEDINGS

Minutes of a meeting of the **Housing, Finance and Regeneration Policy and Scrutiny Committee** held on **Monday 18th November, 2019**, Rooms 18.01 & 18.03, 18th Floor, 64 Victoria Street, London, SW1E 6QP.

Members Present: Councillors Melvyn Caplan (Chairman), Antonia Cox, Adam Hug, Matt Noble, Mark Shearer and James Spencer.

Also Present: Councillor Rachael Robathan (Cabinet Member for Finance, Property and Regeneration), Councillor Andrew Smith (Cabinet Member for Housing and Customer Services), Gerald Almeroth (Executive Director - Growth, Planning and Housing), James Green (Director of Development), Neil Wightman (Director of Housing), Jon Lock (Acting Head of Housing Operations), Aaron Hardy (Policy and Scrutiny Manager) and Toby Howes (Senior Committee and Governance Officer).

Apologies for Absence: Councillor Guthrie McKie and Councillor Emily Payne

1 MEMBERSHIP

- 1.1 It was noted that Councillor Emily Payne had replaced Councillor Richard Elcho as a substantive member of the Committee.

2 DECLARATIONS OF INTEREST

- 2.1 There were no declarations of interest.

3 MINUTES

3.1 RESOLVED:

That the minutes of the meeting held on 12th September 2019 be signed by the Chairman as a correct record of proceedings.

4 CABINET MEMBER FOR FINANCE, PROPERTY AND REGENERATION UPDATE

- 4.1 Councillor Rachael Robathan (Cabinet Member for Finance, Property and Regeneration) introduced the report and confirmed that the Council had now

obtained London Living Wage (LLW) employer accredited status. The Council was ahead of a number of other London boroughs in implementing the LLW. Councillor Robathan added that the LLW offered staff fair wages and also motivated staff to deliver the high quality services expected

- 4.2 The Committee sought an update on the Fair Funding Review and the Spending Review and the approaches the Council was taking towards these matters. Members asked whether there would be any consultation or technical debates this year for the local government finance settlement, in view of the short timescales involved.
- 4.3 Members noted that the Community Contribution rates in the first half of this year were down compared to the last year and asked what steps were being taken to increase contributions. Further details were requested regarding the breadth of the procurement review. Members sought updates with regards to the Beachcroft, Church Street and Lisson Arches regeneration schemes. With regard to Dudley House, a Member expressed concern that there was no longer to be social housing on site, even though this had been initially proposed. In respect of tenants in renewal areas, clarification was sought as to what constituted under-occupancy.
- 4.4 A Member commented on the successful consultation on Infill schemes in his ward which had the support of residents. The Local Lettings Policy was also welcomed, however it was asked how this could be made to benefit residents more who already lived locally in that area. With regards to the Coroner's Court, Members sought an explanation as to how the costs were covered.
- 4.5 In reply to issues raised by Members, Councillor Robathan informed the Committee that a robust financial planning process was in place to address all scenarios in respect of the Fair Funding Review and the Spending Review. With regards to Community Contributions, she advised that two letters were sent to the relevant residents and brochures would also be sent out detailing the charities that had received funds and what they were doing with them. Councillor Robathan stated that an important review of procurement was taking place and it would align procurement in all service areas and the procurement of Adult Social Care and Children's Services would be brought together. Turning to Beachcroft, Councillor Robathan advised that work was taking place in respect of the internal fit outs with the contractor, and construction was on target. Engagement was ongoing with regards to the Church Street scheme and consideration was also being given as to how to engage with residents whose first language was not English. There were challenges to overcome at the Lisson Arches site, however every effort was being made to make progress with this site.
- 4.6 In respect of the Local Lettings Policy, Councillor Robathan advised that how this was implemented was dependent on the circumstances of the particular locality and the input of ward councillors was welcomed. She emphasised the importance of keeping local people within their community and in identifying and prioritising families who were in high need. Councillor Robathan had visited Dudley House and had looked at affordable homes on the site. She commented that the studio flats were spacious, whilst the two-bedroom flats

consisted of two separate units with a shared living room. Members heard that applications for flats in Dudley House were oversubscribed, with 300 applications for 197 units. With regards to the tenant policy in renewal areas, there had been extensive debate on this matter. Although in some cases, there would be instances where people would be re-housed in properties that had less space than they were used to, there was flexibility within the policy to provide an additional bedroom in some circumstances. Turning to Coroner's Court, Councillor Robathan advised that the Council shared the costs with the Royal Borough of Kensington and Chelsea and the London Boroughs of Merton and Wandsworth and the cost allocation between the four councils had been agreed. The Council was the lead partner and work on the Coroner's Court was due to take place soon.

4.8 Gerald Almeroth (Executive Director – Finance and Resources) advised that the local government finance settlement had been due to be announced in the first week of December, however because of the General Election, it was due to follow shortly after the Election. The Government was aware of the implications for local authorities in not receiving the settlement until later than planned and the Council's budget for the next year had been designed to soften the blow. Gerald Almeroth advised that the Government would undertake a technical consultation with local authorities after the first year spending round, whilst consultation on the Fair Funding Review was due to commence in the New Year.

4.9 James Green (Director of Development) advised in respect of Lisson Arches that lessons had been learnt and that an update could be provided on this at a future meeting.

4.10 The Committee requested a breakdown of types of housing units for developments in future reports, to be provided with a definition of under-occupancy for housing renewal areas and an update on Lisson Arches.

4.11 **ACTIONS:**

1. Information on development schemes to include a breakdown of how many housing units are social/intermediate and how many are new/provided (Action for: Neil Wightman, Director of Housing Services).
2. Definition of under-occupancy in housing renewal areas to be provided (Action for: Neil Wightman, Director of Housing Services).
3. Update on Lisson Arches to be provided (Action for: James Green, Director of Development).

5 CABINET MEMBER FOR HOUSING SERVICES UPDATE

5.1 Councillor Andrew Smith (Cabinet Member for Housing Services) introduced the report and advised that there had been improvements in performance in respect of the Contact Centre. Changes had also been made in respect of billing for leaseholders, following suggestions by the Committee and this was due to take effect from 1 April 2020. A new adviser had also been appointed

in the Homeless Prevention Team.

- 5.2 The Committee commented that some leaseholders were still confused about service charges for major works and protection works and sought details as to what steps were being taken to explain to leaseholders what was being asked of them. It was remarked that residents preferred evening surgeries to discuss this. The importance of explaining the financial terms of payment of these works was emphasised and it was asked whether different financial terms depending on the type of leaseholder were offered. Members welcomed the achievements of the Housing Solutions Service, however it was commented that there were capacity issues and it was queried if any additional resources could be made available. An explanation was also sought as to why there had been a drop in the number of full homelessness duty acceptances.
- 5.3 Members welcomed the progress made in implementing traffic management orders (TMOs) on housing estates and they asked when this was likely to be completed. An update on fire safety works was also sought and it was asked whether the Council was satisfied that there were no buildings that had flammable cladding.
- 5.3 In reply to issues raised by the Committee, Councillor Smith advised that improvements were being made in respect of Section 20 explanations to leaseholders concerning major works and protection works, however more effort could be made to ensure the information was clearer in future and resident surgeries on this matter were also available. There were also a range of payment options available for leaseholders. Councillor Smith acknowledged that the Housing Solutions Services were dealing with a number of cases and discussions needed to take place with regard to resource pressures. There was a substantial focus on fire safety and Councillor Smith felt reassured that there were no flammable cladding or materials on Council homes. In respect of implementation of TMOs, Councillor Smith stated that further details could be made available. In some of the remaining areas where the TMOs were yet to be implemented, some residents had stated that they were preserving parking spaces by using bollards, however in such cases they had been advised that this was not legally enforceable without a TMO being in place.
- 5.4 Jon Lock (Acting Head of Housing Operations) added that 60 sites had gone through the process of TMO implementation to date and there had been a re-consultation in some areas. He confirmed that enforcement was taking place where TMOs had been implemented.
- 5.5 Neil Wightman (Director of Housing) stated that evening surgeries for leaseholders in respect of major works and protection works could be offered. There had also been consultation with leaseholders on this matter and a YouTube feature explaining how it worked and the options available was shortly to be released. Neil Wightman stated that there had not been significant negative feedback from residents on this issue. Steps were being taken to improve the Housing Solutions Service and there were some temporary additional resources available. With regards to the drop in full homelessness duty acceptances, Neil Wightman stated that no particular reason for this had been identified, however this could be looked at in more

detail and it was possible that the drop may be partly attributable to the effectiveness of frontline homelessness prevention services. Neil Wightman also stated that checks could be undertaken to ensure there was no flammable cladding on new developments.

5.6 **ACTIONS:**

1. Investigate as to why there had been a drop in full homelessness duty acceptances (Action for: Neil Wightman, Director of Housing).
2. Provide information on what has been done to ensure that new developments do not have flammable cladding and are complying with fire safety regulations (Action for: James Green, Director of Development).
3. Update in early 2020 to be provided on the rollout of TMOs and enforcement where this has been undertaken (Action for: Jon Lock, Acting Head of Housing Operations and Kevin Goad, Director of City Highways).

6 **HOUSING MANAGEMENT SERVICES UPDATE**

- 6.1 Neil Wightman (Director of Housing) gave a presentation on Housing Management Services, including progress made since the Task Group recommendations and the strategic priorities of the department. Neil Wightman advised that his priorities were:
- Responsiveness and quality of repairs service
 - Better Service for leaseholders
 - Support vulnerable residents
 - A new housing services offer and increase resident involvement
 - Prevent homelessness
- 6.2 Neil Wightman explained that the 'Our Voice' survey had identified the desire to provide the right culture to deliver services and to be customer focused. Improvements to the service included the introduction of 'Gober' customer care training, a Members enquiry team, the 'Your Voice' newsletter and there was also continuous learning and immediate satisfaction monitoring. In future, speech analytics data would be used to drive improvements. Neil Wightman also set out the improvements to the repairs and maintenance performance and for leaseholders.
- 6.3 Members noted the improvement in the repairs performance but commented that there was still a relatively large number of responses that were dissatisfied with repairs carried out. The Committee welcomed the improved culture and the willingness in taking ownership of matters raised by residents. Members asked what steps were being made to ensure more staff were visiting estates and identifying problems. Details were sought about the timescales involved for the ongoing improvements to Housing Management Services. Monitoring of follow-on work where jobs had not been completed was also necessary to prevent residents having to make multiple calls and it was asked what escalation process was in place where multiple calls had to

be made. Members asked why there had been a recent spike in calls from residents. Information was sought on the processes in place for self-evaluation of the service. Members also asked if there were any other ways of measuring residents' satisfaction other than through post-call surveys. The Committee commented that whilst the Westminster on Meals service had been successful, it was not the answer to all issues residents may encounter.

- 6.4 In reply to issues raised by the Committee, Councillor Smith acknowledged that the number of repairs reported as unsatisfactory was still too high, however a better relationship between the Contact Centre and the Repairs Team was being developed to ensure that the appropriate worker was allocated to the repair job. There was also software in place to capture more in-depth feedback from residents. Councillor Smith emphasised that ownership and presence on estates was at the heart of the service's priorities and an estate action plan would embed this. The Westminster on Wheels service was also being reviewed to make it more flexible. Councillor Smith added that there were a number of ways in which customer satisfaction was measured and the speech analytics project would provide further means once it was completed.
- 6.5 Neil Wightman advised that complaints often arose in respect of communal repairs and a re-organisation of Estate Services was taking place so that more simple repairs could be carried out there and then, rather than going through the reporting process first. The Committee heard that a new mobile working solution for staff was due to be launched in mid-December. With regards to the recent spike in calls, Neil Wightman advised that this was common at this time of year. Where there were multiple calls concerning a particular job, this would be internally looked at. Neil Wightman informed Members that the new management structure would go live on 1 December and the next phase would involve improving customer access to frontline staff and increasing post repair inspections. Turning to self-evaluation of service, Neil Wightman stated that this involved looking at complaints data and managers had the authority to undertake an internal call-in of a particular case.
- 6.6 The Committee noted that there were still a number of performance indicators rated 'amber' as opposed to 'green' and requested an update on Housing Management Services in six months' time.

7 ANTI-SOCIAL BEHAVIOUR ON ESTATES TASK GROUP REPORT

- 7.1 The Chairman welcomed the contributions made during the course of the Task Group's work and commented on the worthwhile meetings that had taken place, which had raised a number of questions and issues about how the process of tackling anti-social behaviour on estates operated. He felt that a number useful and challenging recommendations had been made. It was recognised that residents had not received enough support on some matters and there were a number of complex issues and cases to address. There also needed to be more work done to ensure that the right decisions were made for residents and also for specific individuals.

- 7.2 Members welcomed the recommendations of the Task Group and emphasised the need to take up a more joined-up approach to tackle this issue. It was asked if there would be more integration of teams, such as working more closely with the Council's Noise Team and Children's Team.
- 7.3 Councillor Smith welcomed the report and advised that there will be more joint working to tackle this issue, adding that anti-social behaviour occurred not only on estates. Consideration was also being given as to whether additional resources could be brought in.
- 7.4 Neil Wightman also welcomed the report and the recommendations of the Task Group which he felt were challenging, however every effort needed be made to fulfil them. He commented that implementing some recommendations may involve bringing in additional resources and that improving enforcement was a key objective, including the timescales in which it was undertaken. Neil Wightman added that there were already steps being taken to integrate services more to tackle this issue and a meeting with Children's Services to discuss this would take place on 22 November.
- 7.5 Jon Lock stated that working closely with other teams was important to ensure that anti-social behaviour was tackled more effectively and a relationship with the Noise Team was being developed.

7.6 The Committee agreed the recommendations of the Task Group.

8 WORK PROGRAMME AND ACTION TRACKER

- 8.1 Members had before them the Work Programme and Action Tracker.
- 8.2 In response to a query from a Member, Aaron Hardy (Policy and Scrutiny Manager) was to consider when the Housing Revenue Account business plan could be considered.
- 8.3 The Committee noted the Work Programme and Action Tracker.

9 ANY OTHER BUSINESS THE CHAIRMAN CONSIDERS URGENT

- 9.1 There was no other business.

10 EXCLUSION OF PRESS AND PUBLIC

10.1 RESOLVED:

That under Section 100 (A) (4) and Part 1 of Schedule 12A to the Local Government Act 1972 (as amended), the public and press be excluded from the meeting for the following item of business because they involve the likely disclosure of exempt information on the grounds shown below and it is considered that, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information:

Item 11.

11 MINUTES

11.1 RESOLVED:

That the confidential minutes of the meeting held on 12th September 2019 be signed by the Chairman as a correct record of proceedings.

The Meeting ended at 8.41 pm

CHAIRMAN: _____

DATE _____



City of Westminster

Housing, Finance and Regeneration Policy and Scrutiny Committee

Committee date: 17 March 2020
Author: Councillor Melvyn Caplan
Portfolio: Finance, Property and Regeneration
Please contact: Angela Bishop, Cabinet Officer
abishop@westminster.gov.uk

Overview

I am pleased to take on the portfolio of Finance, Property and Regeneration. I will continue my predecessor's work to deliver sound financial decisions that facilitate ambitious programmes which improve the lives of our residents.

We have already delivered 641 affordable homes and we are on track to exceed our target of 1,850 homes by 2023. I will be making sure that that housing we deliver is green and helping Westminster Council be carbon neutral by 2030. I'll be working with residents, businesses and landowners to improve and future-proof our iconic Oxford Street.

Finance and Resources

1. Revenues (Council Tax and Business Rates)

- 1.1. Council Tax collection has continued to improve, and now aligns with the collection level of last year, which should in turn mean that end of year collection should hopefully mirror last year's highest ever collection figure of 96.7%.
- 1.2. The current business rates (NNDR) collection rate is only down 0.3% compared to the same point in time last year, despite a number of retailer insolvencies during the current year. It is anticipated that it should be possible to match last year's collection rate of 98.0% by year end.
- 1.3. The Council also collects Business Improvement District (BID) levies for the borough's 12 BIDs. Collection is progressing well with 9 of the 12 BIDs remaining, which is an improved collection on last year.

2. Discretionary Housing Payments

- 2.1. Discretionary Housing Payments (DHP) are made in accordance with the Council's DHP policy and provide additional support to Housing Benefit and Universal Credit claimants. Due to central government reductions in the Council's DHP funding allocation in recent years, the Council has previously agreed to top-up the government's funding allocation from within its own resources. The Cabinet Member for Finance, Property & Regeneration has agreed in principle to fund a top-up if required in 2020/21.
- 2.2. At the end of Quarter 3, it was forecast that a top-up may be required at year end of around £140,000. The benefits service will continue to review the forecast on a quarterly basis.

- 2.3. The Council is awaiting the Government's announcement on the Council's DHP funding allocation for 2020/21.

3. Budget

- 3.1. The Budget was approved by Council on March 4th, 2020.

4. Community Contribution

- 4.1. At the end of December 2019, we have collected £900,172 from 812 unique donors of Band H properties.

5. London Living Wage Adoption

- 5.1. The 'Real Living Wage' is now being applied to all new third-party contracts as contracts are retendered. A Steering Group continues to oversee the Council's progress and to further refine the contract renewal pipeline and establish the status of existing contractors.

6. Procurement Services

- 6.1. Following completion of formal consultation, mobilisation is progressing for the new service to 'go live' on the 6th April. A number of operational changes will also be implemented to improve governance and bringing added focus to contract management. The new service will include procurement activity previously undertaken by devolved teams in the adults and children commissioning services.

Regeneration and Development

7. Church Street

- 7.1. Our stakeholder engagement with the Church Street community is ongoing. On the 16th of February we held a Winter Wellness event for the community, where more than 200 residents attended and took part in activities ranging from Zumba, fencing, yoga, mindfulness and meditation and many more health and wellbeing activities.
- 7.2. Neighbourhood Keepers have just finished their applications for 2020 with some promising community led initiatives and we will be letting successful applicants know by end of March.
- 7.3. We have also collaborated with Spacehive to launch Thriving Communities & Create Church Street Funds for employment and creative based projects.

7.4. Luton Street

- 7.4.1. The site office accommodation block has been erected in Luton Street, works are on-going to complete the loading platform which will receive site deliveries from the end of March.
- 7.4.2. Our new Carrick Yard hoarding has gone up around the area and we have introduced our new Carrick Yard newsletter.

8. Ebury Bridge

- 8.1. The renewal of Ebury Bridge continues to be a top priority for Westminster Council. It's our ambition to deliver a new national standard in estate renewal with the delivery of a vibrant, truly mixed tenure, new neighbourhood.

- 8.2. Pivotal to the delivery of the scheme is the important role the Community Futures Group play in shaping the project. The hard work of the group has brought the project to this point. They will continue to be key to the development through selection of contractors and monitoring of performance.
- 8.3. The project has reached a significant milestone with the successful rehousing of all phase 1 households. 106 secure tenant and leasehold households have moved from the estate with the majority indicating they want to return to a new home on the estate once built.
- 8.4. 'Ebury Edge' Meanwhile facility is scheduled to be completed by Spring 2020. The facility will provide space for new Westminster based start-up businesses, community groups and local residents.

9. Tollgate Gardens

- 9.1. Clarion Housing, who are developing the scheme, continue to report a completion date for the majority of units of 30th March 2020 completion. Two units (houses) have been flooded by a burst internal pipe, and their completion will be delayed until May 2020. Clarion have committed to ensuring that the scheme is delivered to a high-quality finish. The Council continue to monitor works against this expectation.
- 9.2. Improvement communal works to Tollgate House will be delivered as part of the scheme. Residents that are due to return to the new homes as part of the Council's Right of Return offer have had the opportunity to see a completed social rented show home. There has been a very positive response from residents on the standard that is being achieved.

10. Pimlico (Balmoral/Darwin)

- 10.1. The scheme will replace the existing Darwin House Community Supported Housing Scheme with new HAPPI standards flats let at social rents as well as providing flats for intermediate rent.
- 10.2. Public Consultation took place across three days, during which approximately 90 residents attended and 30 left comment cards. The sessions provided a mix of feedback, majority of concerns are over height and massing, residents are satisfied with the affordable housing presented.
- 10.3. The Council is now in the process of reviewing the daylight/sunlight and Right of Light data against the models. The stage 2 design report is under review and will be taken to a pre-application discussion with the planners, along with the feedback from public consultation.

11. The Infill Programme

- 11.1. There are currently 15 new homes being constructed on site, with a further 6 units ready to start on site in early June 2020.
- 11.2. The development team are working with procurement to develop a strategic procurement for the construction of 161 new units across the city. Recent procurement activities for the smaller infills have returned disappointing results, the intention is to offer the market 3 large packages of work, each of which will include a mixture of projects ranging from 2 units to 23 units. The intention of this strategic procurement is to attract a different sector of the market with a view to delivering better value and lower overall risk to delivery.

12. Jubilee

- 12.1. A resident drop-in session took place on Tuesday the 25th of February. This meeting was to inform residents about the next phase of works taking place over the coming months.
- 12.2. The demolition of the existing structures has now commenced. The developer is committed to delivering the completed units by Summer, 2022.

13. Oxford Street

- 13.1. We remain committed to improving Oxford Street and surrounding neighbourhoods and support the principles of the Place Strategy as well as the allocation of the £150 million already set aside to kick start public realm improvements.
- 13.2. But we are now ambitious to go further, particularly in relation to our environmental agenda as well as taking a Smart Cities approach
- 13.3. I am taking the lead on updating our current Oxford Street plans to reflect these fresh ambitions, with a commitment to reengage and continue to collaborate with residents, businesses and landowners to develop our plans further.

Human Relations

14. Staff Survey

- 14.1. Westminster City Council's overall Engagement Index for 2019 is 73%, excluding the housing team (previously City West Homes). This is an increase of 3% from last year (70%). In addition, this result is 4% above the 2019 local government benchmark. The council's engagement index including the housing team (formerly CWH) is 72%. The appendix details the full survey results for this year.
- 14.2. This result is a very positive indicator that people are engaged by our vision of City for All. The response to the question "I believe the work I do will help us deliver a City for All" has increased by 15% since 2017, and is now 79% positive.
- 14.3. Excellent progress is also being made in making Westminster a great place to work: the answer to this question is now 67% positive, an increase of 14% since 2017.
- 14.4. The response rate was 70% which has increased significantly compared to the last two years when it was 62%. This shows that staff are taking the time to fill in the survey as they continue to place more trust in the organisation.
- 14.5. We look forward to continuing to make Westminster the best place to work and live.



Housing, Finance and Regeneration Policy and Scrutiny Committee

Committee date:	17 March 2020
Title:	Fire Safety in New Developments and Current Housing Stock
Report Of:	James Green, Director of Development and Neil Wightman, Director of Housing
Report Authors and Contact:	Paul Choat and Jim Patterson

Fire Safety in new developments

This note aims to inform the committee regarding the measures currently being taken and measures currently under consideration in respect of promoting fire safety in new developments.

1. Introduction

Although Grenfell Tower was an existing, refurbished block there are many lessons that can be applied to our new developments. WCC's Employers Requirements have always called for a high standard of fire protection to be incorporated into the design and construction, but they have been enhanced following the immediate recommendations of the Hackitt Inquiry and will continue to be enhanced as new considerations emerge.

This report focuses on our new buildings; the development team are currently to track to delivery 1850 new affordable homes by 2023, and it is anticipated that a similar quantity of new homes will be delivered between 2023 and 2028. The WCC development programme also includes ?? private-sale homes. WCC's approach to fire safety in new buildings takes no account of tenure type, the fire safety measures incorporated into each building are entirely based upon the buildings location, configuration and levels & type of occupancy.

In general, the construction and housing industries are anticipating significant changes to the building regulations in terms of design requirements and the processes and protocol's for approval. The development team have worked with external experts to anticipate the requirements and incorporate the necessary changes. Whereas the tragedy at Grenfell has been a catalyst for the industry-wide review of fire safety, the development team have endeavoured to take a wider view of fire safety rather than just focus on the key headlines of the report by Dame Judith Hackitt.

This briefing will focus on changes key building components as well as the management of the design, and the management of the building once it is inhabited (in-use).

2. Key Building Components

The key building components are divided into two key areas: building fabric and building services, each of these areas play important roles in delivering safe buildings.

2.1 Building Fabric

The primary consideration when designing a safe building is the fabric of the building; careful design of the fabric will minimise the opportunity for fires to start and will restrict the fire's ability to spread. The key elements of the fabric are the internal walls, external walls, doors, windows and service routes.

External Walls

We have changed our Employer's Requirements documents to ensure that combustible materials are not included in the composition of the external walls, irrespective of the height of the building. Because the non-combustible materials are generally heavier and bulkier, this has required significant redesign of a number of buildings that were already in an advanced stage of design or construction (such as Dudley House, Parsons North, Cosway Street and Ashbridge Street). Structures have been updated to account for the increased weight, in some cases minor amendments to the planning consent have been sought, to account for the slight increase in the size of the building.

It should be noted that the infill schemes at Melrose & Keith, Ordnance Mews and Helmsdale House, contain foam insulation. The insulation is an integral part of the building's structural system and could not be omitted, however steps have been taken to ensure that the insulation is fully encapsulated within non-flammable materials (masonry and concrete panels externally, and fire-rated plasterboard internally), in addition these properties all benefit from sprinkler protection.

Internal Walls

The internal walls are constructed in accordance with the requirements of building regulations, with fire resisting compartments constructed to suit the fire strategy. Where services penetrate fire compartment walls, they are "fire stopped" as appropriate, WCC require the Main Contractor to run a stand-alone Quality Assurance process for the fire stopping element of the project.

Doors

All front doors are FD30s compliant, they are supplied as part of a certified door set, any glazing such as fan lights or side panels is required to be fire rated glass.

2.2 Building Services

Sprinklers

Sprinklers are included in all new multi-occupancy developments irrespective of the height of the building. Concealed sprinkler heads and pipework are installed into each dwelling.

Dry Risers

Dry Risers are installed in accordance with building regulations and Fire Officer requirements.

Automatic Detection and Alarms

All new blocks require a LD2 level of fire alarm system; this means that all communal areas are covered by manual “break-glass” call points, as well as automatic mains-powered smoke detectors. All dwellings have mains-powered automatic smoke detectors in each room where a fire may start (excludes kitchens and bathrooms).

The call-points and smoke detectors in the communal areas are connected to AOVs (Automatic Opening Vents) in the communal areas, which assist in clearance of smoke, thus providing a safer escape route for residents and a safe working environment for firefighters.

The communal fire alarm system interfaces with the building’s management systems, to allow for automatic dial-out to the emergency services in the event of activation. The fire alarm also interfaces with the lifts to ensure that the lifts return to ground floor and inoperable thereafter in the event of a fire.

We are currently reviewing the viability of installing a “repeater panel” to the ground floor of every building. The panel will allow the firefighters to identify the source of the alarm upon arrival at the building.

We are currently reviewing the viability of installing a Fire Brigade-operated evacuation alarm system. Currently the only way for the fire brigade to notify residents of the need to evacuate, would be for them to knock on every door. This system would enable firefighters to make an assessment upon arrival at the scene and trigger a sounder in every dwelling to alert residents of the need to evacuate.

Emergency Lighting and Signage

All communal areas are covered by mains-powered, battery backed emergency light fittings, with illuminated escape signage at key locations. Floor / Level Numbers will be displayed on photoluminescent boards on each landing.

We are currently reviewing the viability of installing photoluminescent strips to the stair nosings in communal areas, and also the installation of low-level photoluminescent dwelling number signs.

Lifts

A firefighting lift is installed in all dwellings over 18m tall.

3. Building and Design Management

BIM (Building Information Modelling)

The Hackitt report identified major issues with the way in which technical design information for buildings is stored and updated, the report made recommendations for the wider adoption of BIM. All of WCC's new build developments are already designed using BIM, the development team have established robust protocols for the external designers and contractors to follow when designing and constructing new buildings.

BIM allows designers to work collaboratively to produce information using a 3d model, there are numerous benefits in terms of the accuracy of design and programme. The BIM model stays "live" throughout the lifespan of the building, all of the key components are tagged with information regarding provenance, composition, warranties and required maintenance.

The next challenge is to procure a data environment, to store and effectively communicate the as-built information. The common data environment will be a central repository for all building models which will be accessed and updated by anyone undertaking works to the building during its lifetime. The development team are in the early stages of this procurement currently.

Home User Guides

All residents of the new homes are issued with a Home User Guide, the home user guide includes information on the life safety systems in the building and how to use them, the fire strategy, advice on prevention of fires and clear instructions regarding what to do in an emergency. The Home User Guide is discussed with every resident as part of the hand over.

Handover from Development to Housing

The development team work closely with the Westminster Housing Services to ensure that the buildings are handed-over properly; ensuring that the in-use officers are fully appraised in respect of the safe operation and maintenance of the new buildings. The volume of new properties being delivered is rapidly increasing each year, and the process for handing-over develops as lessons are learned from each project.

Next Steps

In the absence of new legislation and guidance from central government, and in the face of varying advice from industry we believe that the current processes and designs provide Westminster residents with safe and secure buildings.

The Employer's Requirements (ER's) are currently being rewritten and will incorporate the measures scheduled above*. The ER's will be revisited to account for any new legislation that arises, but in the interim the Development Team will continue to review industry advice and liaise with peers in respect of emerging best practice.

* Excludes items currently noted above as "under review": repeater panel, evacuation system, photoluminescent stair nosings

Fire Safety in current social housing stock

4. Fire doors

Following the last P&S committee good progress has been made to many of the recommendations. Below is a summary on progress and other issues relating to fire doors

Front entrance fire door regulation	A front door regulation criterion has been defined as per the British Standards and this is captured by the comprehensive fire door inspection regime which is in place. Major works has included this on a scheme by scheme basis from November 2019
Recording the inspection of front entrance fire doors in tall buildings	This is in place and is completed on a monthly basis
Major works inspections of front entrance fire doors (both tenants and leaseholders).	This is now included within all major works client briefs
Data and reports on fire safety matters	Monthly fire statistics are reported on a monthly basis to Health & Safety committee which are reported quarterly to the Cabinet Member and will be incorporated in dashboard to A&P.
Number of staff who can be trained as fire inspectors	14 staff are progressing through the Fire Door Inspection Programme, similar to 2018-19
Timeline for all fire doors to be inspected.	
Lobby for appropriate bodies to dedicate resources to support local authority building owners to train the staff and carry out the inspections in accordance with the London Fire Brigade's expectations.	Ongoing

In addition, the Director of Housing has put in place a more formal reporting structure, by establishing a monthly Health & Safety committee, fire prevention forms an important part of this agenda.

Below this committee, the Divisional Head of Property has created a monthly Fire Working Group where all aspects of fire prevention, including tracking the completion of

FRA's, ensuring that these are transferred into completed works e.g. inclusion on work programmes, raising of repairs.

Some of these programmes will take several years to complete e.g. fire door programme, and therefore will be included within a comprehensive programme to be developed to ensure that all these works can be done in a timely manner.

5. Sprinklers

The task group agreed the following recommendations in relation to sprinklers

Install sprinklers in all properties regardless of tenure, seeking to recover costs from post-1987 lessees only. (option A)	This work has commenced. We have installed a full sprinkler system to Glastonbury House
Work to establish a legal agreement for the right of access in to lessee properties and for charging post-1987 lessees	Currently being reviewed.
Carry out section 20 consultation for post-1987 lessees and then undertake the installation of the system to a block, deferring demanding the service charge until completion.	Our Media team is undertaking online surveys with leaseholders regarding the installation of sprinklers – results are pending.
Installation of option 1 (Boxed in plastic pipework with concealed heads) sprinklers	As part of the above Leaseholder are being asked on the aesthetics of sprinklers
Work with the London Fire and Emergency Planning Authority and key industry bodies to develop a comprehensive programme of ongoing dialogue and communication with all leaseholders to obtain access to their properties and to document all such individual engagements.	In Progress
Prioritise sheltered housing over tall buildings and establish budget for doing so within the HRA business plan	We prioritised Glastonbury House, and we are reviewing Glarus Court.
Ensure comprehensive records of fire safety works on each property are kept, including work and inspections undertaken by others	Records are kept, we are intending to transfer all records onto a central database – SHINE. This will commence February 2020 and will

such as the fire brigade, as per the recommendations of the Hackitt report.	provide a comprehensive and user-friendly database across the directorate.
Communicate advantages of sprinklers to private freeholders of tall buildings and to maintain a record of all such communications.	
Lobby Government (through LGA and London Councils were appropriate) on funding for the retrofitting of sprinklers, especially in cases where the Housing Revenue Account is having to fund such works.	This is being done via the monthly Housing Director Fire Safety meetings.
Lobby the government to amend regulations ensure retrofitting sprinklers is easier for social landlords.	
Continue to lobby the Mayor of London so that LFEPA provide specific guidance on the installation of sprinklers to mixed tenure blocks, specifically where leaseholders are able to decide (as is currently their right) whether or not to allow access to their properties for works to be done and to be maintained in the future. Also, lobby government for any changes that can be made to regulations to permit the council to enter (by appointment) such properties to carry out the works.	

Fire Safety in temporary accommodation

6. Fire risk assessments and spot checks

Temporary Accommodation (TA) comprises two forms of accommodation. Emergency accommodation (called stage 1), for use whilst a household's homeless application is being assessed. Secondly, there is longer-term, (stage 2) accommodation. This accommodation is for households where the council has accepted a housing duty to them and is provided until suitable longer-term accommodation is available.

WCC ensure that all properties secured for vulnerable people to use as temporary accommodation meet a suitable and safe property standard. WCC acquisition of properties for the purpose of TA requires all surveys to include a fire risk assessment as part of the condition survey of the property.

Providers of TA are required through contracts to meet suitable and safe property standards. WCC operate an annual inspections regime. All inspections include a fire risk assessment and the Housing Solutions Service engage their own environmental health consultant to inspect and review the conditions of all emergency (stage 1) accommodation.

WCC Housing Supply team also complete spot checks and inspections of TA accommodation to ensure that consideration is given to potential risks and hazards to health and safety. These officers have been trained to the national Health & Safety Standards for Rented Homes (HHSRS). Officers of this team inspect accommodation leased from private landlords.

7. Cladding

WCC have completed a review of TA accommodation that has ACM cladding. Of the 32 providers who work with WCC, none identified ACM cladding on any of the TA accommodation we use. One provider highlighted 6 units that have cladding of a different specification to ACM. We are currently reviewing the specification detail of this product with officers in WCC asset team.

8. Setting the standard

WCC are about to start work with the pan-London programme 'Setting the Standard' (STS) to develop a London wide standard in Stage 1 accommodation across all local authorities. The STS programme is scheduled to go live during 2020 and requires an annual Housing Health and Safety Rating System inspection of all accommodation and includes;

- Developing a centralised pan-London inspection service to guarantee that inspections of accommodation are carried out annually and that the records are uploaded to the web-based referencing system. Satisfactory properties would maintain their status on the STS list and properties requiring works withdrawn and referred to the host borough for enforcement action.
- Create a central team of Inspectors overseen by qualified environmental health practitioners who would be dedicated to the task of inspecting and rating of nightly paid B&B and studio accommodation used by all London Boroughs.

Fire Safety in private sector housing

9. Building Safety Programme

- Following Grenfell and in response to Central Government's Building Safety Programme, work has been undertaken to inspect and assess privately-owned

residential high-rise buildings with unsafe ACM (Aluminum Composite Material) cladding across the City. Since identification of affected buildings, officers have been closely engaged with relevant parties, including building owners and leaseholders, to bring about any necessary remediation. This work has included inspections and obtaining certain information regarding building construction and fire risk assessment.

- This work has identified 13 high-rise, privately-owned buildings providing residential accommodation in Westminster which have hazardous cladding. It is important to note that interim fire safety measures which meet LFB approval are in place in these buildings pending full remediation. Officers have been fully engaged with the building owners and relevant partners to secure remediation. This has resulted in one building being fully remediated, and substantial remediation of three further buildings with completion expected shortly.
- Following consultation with LFB and our Building Control department, enforcement action has now commenced under the Housing Act 2004 through the service of Hazard Awareness Notices on building owners. These notices have provided building owners with a 3-month window in which to provide details of how any hazardous cladding is to be removed and replaced.
- Pre-enforcement notification letters were sent to affected leaseholders two weeks prior to this, which provided them with a range of advice and support on this issue. This included a new section on the Council's website to provide further information and a dedicated mailbox to answer any specific queries. This exercise has proved very successful in minimizing queries from affected parties.
- Responses by building owners to the Hazard Awareness Notices will be reviewed and consideration will be given to the need for any escalation of enforcement action with the expiry of the Hazard Awareness Notices this month.
- Officers have encouraged building owners to apply to the Government's Private Sector Remediation Fund to assist with funding necessary works. This has resulted in all bar one of the owners of buildings with hazardous cladding submitting applications for funding. The remaining building has received confirmation that remedial works will be funded through insurance arrangements.
- In addition, MHCLG issued a request to local authorities across the country to undertake a data collection exercise regarding high rise residential buildings in their area towards the end of 2019. Westminster contains one of the highest number of such buildings nationally, and work has commenced to undertake this exercise. This work has attracted funding from the MHCLG in accordance with New Burdens rules

10. Housing Standards Task Force

- The Housing Standards Taskforce continues to enforce against rogue landlords and agents. In the current financial year, we have issued 15 Civil Penalty notices and have collected £61,500 in penalty charges. There is an appeal pending at

the First Tier Tribunal in respect of a £20,000 penalty for the operation of an unlicensed House in Multiple Occupation (HMO) property in Shirland Road.

- Not all cases are prosecuted and where the landlord is cooperative the Council, at its discretion, may decide to take less formal action. In one case in Third Avenue, a student house was found to be unlicensed and following intervention by the HST, the owner (who was not a portfolio landlord) quickly licensed the property, installed a new fire alarm and had the electrics overhauled. Taskforce action has resulted in the discovery of 20 unknown and unlicensed HMOs in the current year.
- The Metastreet report into Houses in Multiple Occupation (compiled with data from the HST analysts) has now been finalised and shows clear correlation between Houses in Multiple Occupation and housing hazards, particularly those relating to fire safety and excess cold hazards. The results of this analysis will form part of the background documentation for the proposed Additional HMO licensing scheme, which will come before members shortly.
- External funding for the Housing Standards Taskforce finishes in March 2020. The team are looking to secure further funding from the Community Infrastructure Levy/Section 106 planning contributions as a means of continuing the project beyond March.

Short Term Lets (STL)

- A meeting was had with the CEO of AirBnB and the STAA (Short Term Accommodation Association) on how the sector could be better regulated, the proposal from the company being a voluntary registration system that could be implemented locally. The City Council would rather a statutory registration scheme but welcome any further steps by the sector.
- AirBnB would like us to consider a joint communications campaign to provide information for hosts, and to work together to develop case studies to inform a proposed AirBnB white paper to Government. That work is ongoing.
- Since 2015, there have been 1987 STL cases, and there are currently 1406 active cases. To date, 482 of those cases have related to Planning Contravention Notices and 24 related to enforcement notices. There have been 166 cases to do with noise, 18 related to anti-social behaviour and 208 cases on waste related STL.



Housing, Finance and Regeneration Policy and Scrutiny Committee Report

Date:	17 March 2020
Classification:	General Release
Title:	Call-in of: Westminster Homelessness Strategy 2019-2024
Report of:	Reuben Segal, Head of Committee and Governance Services
Financial Summary:	The Cabinet Member report sets out the financial implications
Report Author and Contact Details:	Toby Howes Senior Committee and Governance Officer Email: thowes@westminster.gov.uk

1. Executive Summary

1.1 On 19 February 2020, the Cabinet Member for Housing Services made the following executive decisions in respect of the Westminster Homelessness Strategy 2019 – 24 report.

1. That the Cabinet Member for Housing Services agreed the Homelessness Strategy 2019 – 2024 as set out in Appendix B of the report.
2. That the Cabinet Member for Housing agreed the Homelessness Strategy 2019 – 2024 Action Plan in Appendix C of the report and noted it be updated regularly.
3. That the Cabinet Member for Housing Services delegated authority to the Director responsible for Housing to update the Action Plan in conjunction with the Cabinet Member responsible for Housing.

1.2 Three Members of the Housing, Finance and Regeneration Policy and Scrutiny Committee have subsequently exercised their right that the decision be “called-in” for scrutiny by the Committee. Their reasons for call-in are:

- Where families are being placed (whether temporary accommodation (TA) or private rented sector [PRS] discharge). The Council’s band two placements only are designed to maintain connections for families with children in key

exam years or where someone is working in Westminster. Often even these are on the far side of London, with extremely optimistic assessments of travel time (regularly assuming the use of trains or tube are possible where as in financial reality often it is not). Overall there needs to be greater consideration of how to enable a broader range of homeless families to maintain their connections to Westminster, rather than the direction of travel of the policy which seems to be aimed at encouraging them to end those connections. Westminster should explore more closely what other boroughs are doing to help maintain connections and find new TA option (both in borough and nearer to Westminster- Westminster City Council has taken some steps towards the latter).

- How they are being discharged. We have long raised concerns about the way in which PRS discharge is being used to end Westminster's duty of care to these families. Other boroughs do seem less keen to completely discharge their duty even when the private sector is being used to house homeless families. There needs to be a clear pathway for people who have been longstanding Westminster residents to be able to return to permanent housing if they want it- we understand the potential length of wait as do the residents but the choice should be theirs.
- Why has number of duty acceptances been falling? At a committee last year we were given a reply that we would know more as we moved through 2019/20 about how the Homelessness Reduction Act was bedding in and we would have a clearer picture of what was happening. As we are now nearing the end of that period what is the current position for 2019/20 acceptances and can the council please explain why it is where it is. What is being done to ensure that all people who have the legal right to support are getting what they need?
- How can we improve the Personal Housing Plan process? From information provided by housing charities there is scope to learn from better practice in other authorities about the quality of the PHPs being provided. Councillors have also, through cases they are dealing with, noticed that there have often been delays in PHPs and other important information being provided to residents and therefore would like to explore further whether Housing Solutions has the capacity it needs to deal with the volume of applications.

2. Recommendations

- 2.1 That the Committee reviews the decision outlined above and, in this instance, agrees one of the following options:
- (a) To endorse the decision made by the Cabinet Members.
 - (b) To refer the matter back to the Cabinet Members for reconsideration.
 - (c) If, in the opinion of the Chief Executive, the matter is contrary to the Budget and Policy framework, refer the matter to Full Council.

3. Background

- 3.1 On 19 February 2020, notice of this decision was published in accordance with the Council's Constitution.
- 3.2 On 26 February 2020, a valid call-in from Councillors Adam Hug, Guthrie McKie and Matt Noble, was received, triggering the requirement from the Committee to consider the call-in.
- 3.3 The options available to the Committees are:

Option A: Endorse the decision taken by the Cabinet Member.

Option B: Refer the decision back to the Cabinet Member. They should then reconsider the decision having regard to the views of the Policy and Scrutiny Committee within 10 working days, amending the decision or not, adopting a final decision.

Option C: If, in the opinion of the Chief Executive, the matter is contrary to the Budget and Policy framework, refer the matter to Full Council

- 3.4 Further information on the Westminster Homelessness Strategy 2019 – 24 report is included in Cabinet Member report and appendices. This is the full report considered by the Cabinet Member on 26 February 2020 and may assist with answering questions from the Committee.
- 3.5 A response from the Cabinet Member for Housing Services to the call-in is to follow.

4. Financial Implications

- 4.1 The financial implications are contained in the Cabinet Member report.

5. Legal Implications

- 5.1 The legal implications are contained in the Cabinet Member report.

List of Appendices

Appendix A – Response to Call-In of the Homelessness Strategy 2019-2024

Appendix B - Statement of Decision – Westminster Homelessness Strategy 2019 – 24

Appendix C - Cabinet Member Report, 19 February 2020, Westminster Homelessness Strategy 2019 – 24 report and appendices

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Appendix A: Response to Call-In of the Homelessness Strategy 2019 - 2024

1. Reason for the Call-In of the Homelessness Strategy 2019 - 2024 and summary response

Reasons 1 and 2

- Where families are being placed (whether temporary accommodation (TA) or private rented sector (PRS discharge). The Council's band two placements only are designed to maintain connections for families with children in key exam years or where someone is working in Westminster. Often even these are on the far side of London, with extremely optimistic assessments of travel time (regularly assuming the use of trains or tube are possible whereas in financial reality often it is not). Overall there needs to be greater consideration of how to enable a broader range of homeless families to maintain their connections to Westminster, rather than the direction of travel of the policy which seems to be aimed at encouraging them to end those connections. Westminster should explore more closely what other boroughs are doing to help maintain connections and find new TA option (both in borough and nearer to Westminster- Westminster City Council has taken some steps towards the latter).
- How they are being discharged. We have long raised concerns about the way in which PRS discharge is being used to end Westminster's duty of care to these families. Other boroughs do seem less keen to completely discharge their duty even when the private sector is being used to house homeless families. There needs to be a clear pathway for people who have been longstanding Westminster residents to be able to return to permanent housing if they want it- we understand the potential length of wait as do the residents but the choice should be theirs.

Summary response

- Many London boroughs make private rented sector offers to homeless households which were made possible by the Localism Act 2011. Households are prioritised for private rented sector homes in 3 bands in line with Westminster's Accommodation Placement Policy. Those prioritised for band 1 (Westminster and adjoining boroughs) have the highest social and welfare needs and the criteria reflects the acute shortage of affordable private properties for low income households in central London. As an example, the difference between a lower end 2 bedroom private rented home in Westminster, and the maximum amount that can be claimed in Local Housing Allowance, is £219 per week. Over the past 2 years, 23% of private rented homes offered were in Westminster, 71% were in London and 6% were outside London. Overall 44% of temporary accommodation (TA) is in Westminster and there are similar challenges in procuring affordable TA locally
- Given local market difficulties it is common for boroughs to make private rented offers beyond their boundaries. Some boroughs however, for example Camden and Lambeth, enable those moving outside the local area to remain on their social housing register. The council has chosen not to take this approach due to the risk that it offers 'false hope' given the high demand for

social housing and instead the Homelessness Strategy focuses on helping households to settle into new areas and to have more choice over these areas. However, it is intended that alternative options will be looked at as part of the council's forthcoming review of its Allocation Scheme.

Reason 3

- Why has number of duty acceptances been falling? At a committee last year we were given a reply that we would know more as we moved through 2019/20 about how the Homelessness Reduction Act was bedding in and we would have a clearer picture of what was happening. As we are now nearing the end of that period what is the current position for 2019/20 acceptances and can the council please explain why it is where it is. What is being done to ensure that all people who have the legal right to support are getting what they need?

Summary response

- The Homelessness Reduction Act 2017, implemented from April 2018, radically changed homelessness legislation, aiming for fewer households to be accepted as homeless and needing TA, through earlier and more effective prevention. Caution therefore needs to be exercised when comparing data, pre and post, the Act. The first year of the Act saw Westminster's homeless acceptances fall from 443 in 2017/18 to 214 in 2018/19. Just under 400 acceptances are projected for 2019/20, indicating that the first year of implementing the Act was likely to be an anomaly.

Reason 4

- How can we improve the Personal Housing Plan process? From information provided by housing charities there is scope to learn from better practice in other authorities about the quality of the PHPs being provided. Councillors have also, through cases they are dealing with, noticed that there have often been delays in PHPs and other important information being provided to residents and therefore would like to explore further whether Housing Solutions has the capacity it needs to deal with the volume of applications.

Summary response

- The Homelessness Strategy acknowledges that Personal Housing Plans need to be improved and a review of them has already been undertaken which involved customers. Improvements have now been made and a new approach was implemented from December 2019, such as setting out clearly the actions that all parties need to take, making the language used in them jargon free and including a simple flow chart summarising the process that will be followed, as feedback from customers suggested this was confusing. Implementing the Act has been challenging given that demand for the Housing Solutions Service rose by over 140% and there have been some delays in assessing cases. In response, new customers to the service now get an 'on the day' appointment with a case officer and a special team has been established to deal with outstanding cases.

1.1 A fuller response with background information is in the next sections.

2. Offering homeless households private rented housing

There is a legal duty for homelessness strategies to include plans for ensuring sufficient accommodation for homeless households¹ and this is covered in Point 7 of Westminster's Homelessness Strategy 2019 – 24, which aims to:

Ensure a range of accommodation is available for the homeless households that we have a housing duty towards, when homelessness cannot be prevented.

- 2.1 Increasing moves into settled private rented sector homes is one way in which this objective is met. Eighty seven per cent of the 183 respondents to the Homelessness Strategy consultation, either agreed or strongly agreed with the overall proposal. A small number of respondents however expressed concerns about private rented sector moves. Using the private rented sector responds to there being insufficient social housing in Westminster to meet demand. Currently 4,260 households have priority for social housing, including 2,791 homeless households in Temporary Accommodation (TA) and there are c600 social lets each year.
- 2.2 The Homelessness Strategy also highlights the council's plans to increase affordable housing supply across the city and to deliver at least 1,850 new affordable homes by 2023. It should be noted however that in the short – medium term social supply may reduce, as existing tenants in housing renewal areas need to move to enable regeneration to go ahead.
- 2.3 Tables 1 and 2 show the ways in which a homeless household can move into private rented homes:

Table 1: Private rented sector moves 2018/19 by location

	Westminster	London	Outside London	Total
Private rented sector preventions Where the council offers private rented housing before the main duty is accepted. These offers are accepted on a voluntary basis	76	146	16	238
Voluntary moves from Temporary Accommodation (TA) Where a household agrees to move into the private rented sector from TA	3	9	3	15
Private rented sector offers (PRSOs) These could be made to any household accepted as homeless and where the council has a housing duty towards them. Most commonly they are made to household newly accepted as homeless	1	60	4	65
Total	80	215	23	318

¹ Section 3(1) of the Homelessness Act 2002

	Westminster	London	Outside London	Total
	(25%)	(68%)	(7%)	

Table 2: Private rented sector moves 2019/20 to date by location

	Westminster	London	Outside London	Total
Private rented sector preventions Where the council offers private rented housing before the main duty is accepted. These offers are accepted on a voluntary basis	58	162	6	226
Voluntary moves from Temporary Accommodation (TA) Where a household agrees to move into the private rented sector from TA	0	1	1	2
Private rented sector offers (PRSOs) These could be made to any household accepted as homeless and where the council has a housing duty towards them. Most commonly they are made to household newly accepted as homeless	1	39	6	46
Total	59 (22%)	203 (74%)	13 (5%)	274

- 2.4 Alongside voluntary moves, Private Rented Sector Offers (PRSO) were introduced in 2017 and enable any homeless household, to whom the council has a housing duty towards, to be offered suitable private rented housing. If the offer is refused the council's duty ends. This approach was made possible by the Localism Act 2011 which broke the automatic link between homelessness and the offer of social housing.
- 2.5 For PRSOs the tenancy must be for at least 12 months. The council tries to negotiate the longest private tenancy possible, although often landlords initially will only commit to a one year tenancy. An incentive is offered if the tenancy is then renewed which is enhanced if it is offered for a longer period. In reality the majority of PRSO tenancies are renewed after the initial term and few households re-present within 2 years. Government is also planning to remove 'no fault evictions' in the private rented sector which will help to enhance stability. The council has invested £30m into the Real Lettings Scheme which offers households longer term private rented homes and with follow on support from St Mungo's.
- 2.6 An Accommodation Placement Policy (APP) (Annex A) was implemented alongside the PRSO policy in 2017. This was developed with officers in Adult Social Care and Public Health and Children's Services. It responds to the shortage of affordable private rented housing for low income people in central London and the need to ensure that those with the highest social and welfare needs are prioritised for those homes which are available locally. More

information and background to the Policy is in the Cabinet Member Decision Report².

- 2.7 The Homelessness Strategy recognises that some households may prefer waiting for social homes as they are in Westminster where they may have connections and as they offer more stability and lower rents than the private rented sector, but that overall the approach is a better alternative to waits of over ten years in TA for social housing. Some households do want to accept a PRSO as the case study in 2.12 illustrates.
- 2.8 TA is the least secure form of accommodation where households have licences rather than tenancies and notwithstanding work to procure properties for as long as possible, it is not uncommon for households to move around TA as contracts with different providers end. It is acknowledged to lead to a feeling that 'life is on hold'. As the Homelessness Strategy highlights, research indicates the negative impact it can have on health and wellbeing and also that TA costs the council over £4m annually.
- 2.9 The PRSO Policy and the APP were reviewed after they had been in operation for one year in 2018 and the findings, which are outlined in the Supply and Allocation of Social Housing Report 2018/19³, concluded that the APP remained a robust framework to prioritise households on the basis of their need. The proposed changes to the PRSO Policy were incorporated into the Homelessness Strategy.
- 2.10 The Homelessness Reduction Act 2017 reinforces the use of private rented sector for homeless households. Under the Act, any household that is homeless is owed a 'relief duty', which means the local authority has a duty to try and secure them accommodation, which can be private rented housing as long as it is available for six months. This 'relief duty' applies to all homeless households, including those the council has a legal housing duty towards.
- 2.11 *The location of private rented homes*
As tables 1 and 2 show the majority of private rented offers over 2 years (71%) were in London and 23% were in Westminster. Offers outside London are within the South East. The starting point is always to seek private rented accommodation in Westminster or as close to it as possible, however there are severe shortages of affordable supply for low income households in central London, particularly for family sized accommodation. Local Housing Allowance (LHA) levels are significantly below market rents (see table 3) and Westminster has the third highest rents in London⁴.

Table 3: Westminster rents and Local Housing Allowance Levels

Per week	Shared	1 bed	2 bed	3 bed	4 bed
Westminster rents (30th percentile)	£160	£375	£540	£750	£975
Central London LHA cap	£144.84	£276.51	£320.74	£376.04	£422.42
Gap per week	£15.16	£98.49	£219.26	£373.96	£552.58

² <https://committees.westminster.gov.uk/mglIssueHistoryHome.aspx?IId=9319&Opt=0>

³ https://www.westminster.gov.uk/sites/default/files/social_housing_supply_and_allocations_2018-19.pdf

⁴ Hometrack 2019

Overall benefit cap rates	Singles: £296.35 per week, £15,410 per year Couples/Lone parent households/Households with children: £442.31 per week, £23,000 per year
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2.12 The Homelessness Strategy addresses the unsettling impact of moving to a new area and says that where these offers are outside the city, due to the high costs of rents, more will be done to help households settle into new areas through:

- Offering greater choice over the location of PRSOs so more are in areas where customers have connections or are already living in TA

Case study

Ms A has lived in TA in Merton for 6 years and is being made a PRSO. She wants to remain in Merton as her son has special educational needs and is attending a local school where he is settled. She also feels established in the area and does not wish to return to Westminster. Officers are looking for a private rented property locally for her and are exploring the option of buying her current TA to provide her with a more secure private rented option

- Doing more to explain why these homes are outside Westminster
- Recruiting Community Connectors, possibly ex homeless households that have moved to the same area, to meet them and explain local services
- Continuing to invest in innovative schemes such as Real Lettings where possible.

2.13 The Homelessness Strategy also supports LHA levels being more reflective of lower end rents in Westminster and that the overall benefit cap better reflects the median London household income. Benefit changes would help more low income household to remain in Westminster and London.

2.14 *Other London boroughs approaches*

As Annex B shows PRSOs are relatively common across London. To address concerns about PRSOs resulting in households moving away from their local area, some boroughs, for example Camden and Lambeth, enable homeless households that accept them, to remain on their housing registers and still wait for social housing. In these cases, they are awarded some additional priority for social housing through their allocation schemes. Many boroughs take a similar approach to Westminster however in that the offer of a PRSO cuts the link with social housing, for example Brent and Wandsworth.

2.15 Enfield council has announced its aim to 'end the extensive use of temporary accommodation' and notes that this is part of a wider strategy to 'better support people into good quality private rented homes in the borough'⁵.

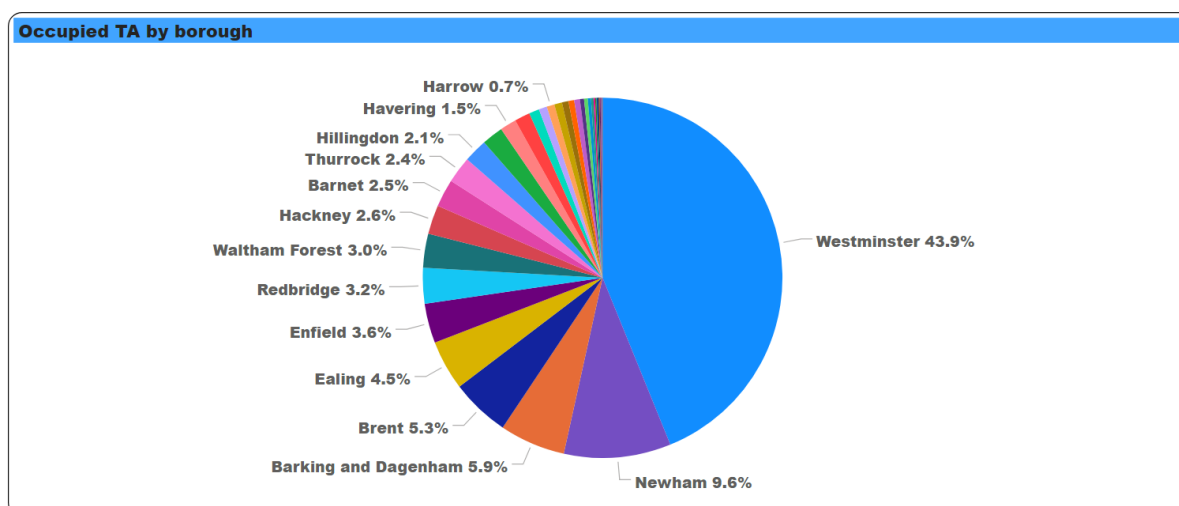
2.16 Westminster has chosen not to enable those offered private rented housing to remain on the housing register, as there is a risk that high demand for social housing could offer them 'false hope', with households still having no realistic chance of being offered social homes in the near future. The focus has

therefore been on offering homes that are affordable in the longer term. The alternative approach could result in a household not feeling settled in a private rented home - or in a new area - perpetuating the feeling that their 'life is on hold'. On the other hand, it is acknowledged that it can lead to homeless households spending less time in TA and working positively with the local authority to resolve their homelessness.

2.17 As highlighted in the Homelessness Strategy, a review of the Allocation Scheme is being undertaken and as part of this the impact of different approaches will be carried out. The progress of a legal challenge being made against Lambeth Council in this area will be taken into account in this review. Lambeth's policy is that homeless households who voluntarily accepted offers of private rented accommodation were awarded higher priority on the housing register, but in the event that this accommodation was outside of the borough they would only be able to remain on the register for two years before losing their local connection. The legal challenge, which is due to be heard by the High Court in June 2020, relates to the scheme as it applied before the Homeless Reduction Act 2017, and is on the basis that it was not made sufficiently clear to applicants that they may have had little prospect of being rehoused during that two year period.⁶

2.18 *Temporary Accommodation (TA)*
 The council continues to face challenges in securing affordable TA in Westminster due to the high cost of rents, LHA levels and as the TA subsidy regime not meeting true costs. Ninety three per cent of homeless households in TA receive housing benefit. Just under half (44%) of TA is in Westminster the 56% that is outside is mainly in London (see chart 1).

Chart 1: TA by location (all types)



2.19 To increase 'in borough' TA, 101 properties have been purchased since 2015/16. Work to procure new TA is ongoing and across London it is

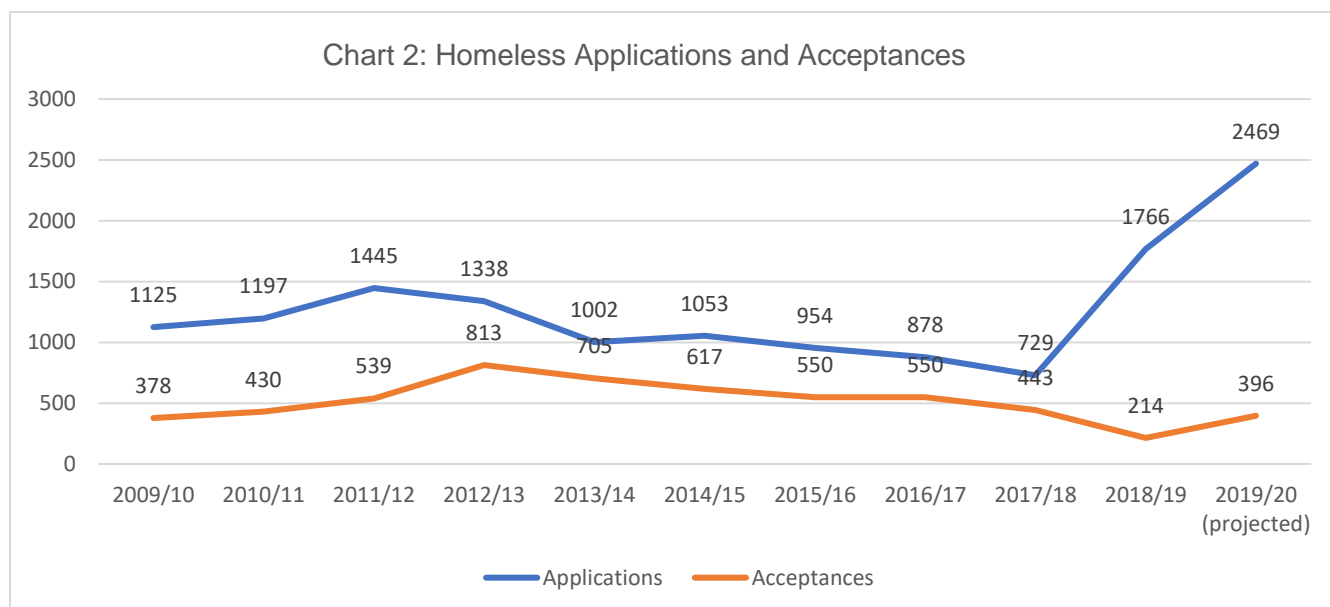
⁶ www.insidehousing.co.uk/news/news/council-taken-to-court-over-allocation-scheme-that-removes-homeless-families-from-housing-register-64157

acknowledged to be a competitive market. With £38m of investment, the council is participating in the pan London Capital Letters scheme, where properties are procured across London according to need, availability, quality and cost. The Scheme aims to reduce costs and competition between boroughs and to allocate properties as locally as possible.

2.20 Some support is available for households in TA outside Westminster, for example the Strengthening Families Programme in 2019 provided workshops for families living outside the city. Given the positive feedback the council is now looking at how it can be continued. A training programme aimed at out of borough TA providers is also underway to ensure they can support vulnerable residents and over 100 staff across 20 providers have been trained so far.

3. The Housing Solutions Service and the Homelessness Reduction Act

The Homelessness Reduction Act 2017, implemented from April 2018, has had a significant impact on the Housing Solutions Service (HSS), with applications increasing by 140% between 2017/18 to 2018/19 and they are projected to rise again for 2019/20 as Chart 2 shows.



3.1 This increased demand has been challenging leading to some delay in assessments. A small number of respondents to the Homelessness Strategy consultation, mostly groups working with homeless households, were critical of the HSS and the quality of Personal Housing Plans was raised (these are a requirement of the Act and set out the actions, both the council and the customer will take to address their homelessness). In response, the Homelessness Strategy includes an action to review and improve these plans.

3.2 This review has now concluded and the new approach, from December 2019, includes: the Plans setting out more clearly the next steps the council and the homeless applicant need to take; using less jargon; and simple flow charts explaining the application process which customers found confusing. Also to address the delays, new customers now have an 'on the day' appointment with a case officer, and where needed, a Personal Housing Plan is also

developed 'on the day' and a letter issued confirming next steps. A short term special team has also been established to deal with outstanding cases.

- 3.3 As Chart 2 shows homelessness acceptances decreased during the first year of the Act from 443 in 2017/18 to 214 in 2018/19. They are expected to rise however during 2019/20, although not to the same level as in previous years. A homelessness acceptance means the council has a housing duty towards a person or household.
- 3.4 The reduction in acceptances led to concern amongst a small number of respondents to the Homelessness Strategy consultation that the council may be 'gatekeeping'. It should however be noted that an aim of the Act is to *reduce homelessness acceptances* through earlier and more intensive prevention work (known as the 'prevention duty') and through a 'relief duty' if homelessness cannot be prevented (see 2.10). However, acceptances during the first year of implementing the Act are unlikely to reflect the ongoing picture as there was some delay in decision making during 2018/19 due to high volumes of cases and the complexity of administering new legislation.

ANNEX A: The Private Rented Sector Offers Policy

Accommodation Placement Policy for Homeless Households (Updated September 2019)

Section 1: Introduction

- 1.1 This Accommodation Placement Policy sets out Westminster City Council's policy for prioritising homeless households for temporary accommodation and private rented sector offers according to its location. This policy does not apply to offers of long-term accommodation under Part VI of the Act.
- 1.2 It covers temporary accommodation for households who are accepted as homeless under Section 193 of the Housing Act 1996 and private rented sector offers (PRSOs) to discharge the main housing duty under provisions enacted by the Localism Act 2011.
- 1.3 This policy does not cover interim temporary accommodation for homeless households where this is required under section 188 of the Housing Act 1996 while inquiries are carried out.

Section 2: Key Principles

- 2.1 In accordance with legislation and statutory guidance, the council seeks to accommodate homeless households in Westminster as far as reasonably practicable. However, as there is a serious shortfall of accommodation in borough to meet housing need, it will not be reasonably practicable to provide accommodation within Westminster to every household and there will be an increasing need to use accommodation that may be at some distance from the borough.
- 2.2 Because of the limited supply of accommodation in both Band 1 and Band 2 (defined below), accommodation within these bands will be allocated to homeless households with a compelling need for it.
- 2.3 This policy is intended to ensure that we prioritise those who have the greatest need to be in or close to a particular location.
- 2.4 In addition, the council assesses the suitability of every offer of accommodation that is made to individual homeless households, in line with legal requirements, including legislation and regulation, associated case law and statutory guidance.

- 2.5 Where there is a particular reason why the household should not be housed in an area (for example, due to a risk of violence), this will be taken into account when assessing suitability.
- 2.6 The council will support people to relocate outside London (Band 3 as defined below), and support will be tailored to the needs of the individual household. Support may be offered to other households moving to properties in other bands if it is needed.

Section 3: Monitoring and Review

- 3.1 The impacts of this policy will be monitored and reported on annually as part of the Supply and Allocations report approved by the Cabinet Member with responsibility for housing each year. The policy will be reviewed after it has been in operation for twelve months (and annually thereafter) and the outcome will be reported to the Cabinet Member for Housing.

Section 4: Accommodation Bands and Priority Categories

Accommodation Bands

- 4.1 All properties provided for use as s.193 temporary accommodation or private rented sector offers are banded in the following areas:
- **Band 1: Westminster and the Local Area**
 - Within Westminster; or
 - Within an adjacent borough to Westminster City Council (Kensington & Chelsea, Camden, City of London, Brent, Wandsworth or Lambeth)
 - **Band 2: Greater London** (within a London Borough)
 - **Band 3: Other Areas Beyond Band 2**

Priority Categories

- 4.2 The priority categories stated in the table below are a guide to placements and how suitable properties in Band 1 and Band 2 should be prioritised. Individual decisions about placements will also take account of the availability of suitable property in the bands. Any special circumstances demonstrating a compelling need for accommodation within either of these bands will also be considered.
- 4.3 Band 1 covers Westminster and adjoining boroughs, however some households within Band 1 who have a compelling need to remain in Westminster will be prioritised for properties in borough. This will be assessed

on a case by case basis having regard to whether the reasons for awarding Band 1 priority demonstrate a compelling need to remain in Westminster.

- 4.4 Where a household is awarded Band 2 priority, the council has the discretion to offer accommodation outside Greater London where this is within a reasonable commuting distance of the school, college or workplace (as applicable).
- 4.5 Priority banding is not a guarantee of placement within the relevant area and is subject to suitable accommodation being available.
- 4.6 Households will be required to provide documentary evidence that they fall within a priority category. The Council's Medical Adviser may also need to assess the applicants' circumstances, where appropriate.

Accommodation Band	Priority Category
<p>Band 1</p> <ul style="list-style-type: none"> • Within Westminster; or • Within an adjacent borough to Westminster City Council (Kensington & Chelsea, Camden, City of London, Brent; Wandsworth or Lambeth) 	<ul style="list-style-type: none"> • Households where at least one member has a severe health condition or disability (including a severe mental health condition) that is long-term and requires intensive and specialised medical treatment/ aftercare that is either (a) only available in Westminster or (b) where a transfer of care would create serious risk to their safety or the sustainability of the treatment or care • Households where at least one member is receiving support through a commissioned care package or package of health care options provided in Westminster, where a transfer of care would create serious risk to their safety or the sustainability of the care • Households where at least one of the children has a Statement of Special Educational Needs or an Education, Health and Care Plan, is receiving education or educational support in Westminster and where it is demonstrated that a placement elsewhere would be seriously detrimental to their well-being • Households with a child where Family Services has demonstrated serious concerns about the child and is working with them intensively • Households whose circumstances come under one of the council's protocol arrangements between Housing and Family or Adult's services or where there is a recommendation through a joint assessment with Adult's or Family services • Households which include a registered Westminster City Council approved foster carer who is fostering a Westminster looked after child • Households which (a) include a Westminster City Council approved person who is caring for a Westminster looked after child, (b) include a Westminster child that is subject to a Westminster Special Guardianship Order or (c) have a private fostering arrangement with a carer resident in Westminster where they have notified the council • Households where at least one person can demonstrate that (a) they have a longstanding arrangement (or if the arrangement has started more recently, that it is likely to be longstanding) to provide high levels of care and support to another person in Westminster who is not part of the resident household and the cared for person would be likely to require statutory health and social support if the care ceased and (b) that they would be unable to commute to fulfill their caring duties • Households where at least one person can demonstrate that (a) they have a longstanding arrangement (or if the arrangement has started more recently, that it is likely to be longstanding) to receive high levels of long term care from another person in Westminster who is not part of the resident household and would be likely to require statutory health and social support if the care ceased and (b) that the carer would be unable to commute to fulfill their caring duties
<p>Band 2</p> <ul style="list-style-type: none"> • Greater London 	<ul style="list-style-type: none"> • Households with at least one child in their final year of Key Stage 4 (generally Year 11) or in Key Stage 5 (A levels or equivalent Level 3 vocational courses, such as BTECs, or GCSE re-sits in English and Maths) at a school or further education college in London • Where the applicant or their partner is accepted by the council as being in employment and has been working continuously for a period of at least six months in Westminster/ a Band 1 borough under a written contract of employment (permanent or temporary) which requires at least 16 hours a week. Parents who are on parental leave but who intend to return to work will also be considered under the criterion • Households already living in temporary accommodation that are required to move due to housing renewal as set out in the Policy for Tenants in Housing Renewal Areas
<p>Band 3</p> <ul style="list-style-type: none"> • Other locations beyond Band 2 	<ul style="list-style-type: none"> • All other homeless households may be offered accommodation beyond Band 2

Section 5: Support for employment within Greater London

- 5.1 Where an applicant or their partner is accepted by the council as being in employment in the rest of Greater London and has been so working continuously for a period of at least six months under a written contract of employment (permanent or temporary) which requires at least 16 hours a week, the council will aim to place them within a reasonable commuting distance to their place of work, where possible. This includes parents who are on parental leave but who intend to return to work.

ANNEX B: Private Rented Sector Offers across London April – June 2019

Bexley	0
City of London	0
Greenwich	0
Islington	0
Kensington and Chelsea	0
Richmond upon Thames	0
Southwark	0
Barnet	1
Bromley	1
Croydon	1
Sutton	1
Harrow	2
Kingston upon Thames	2
Lewisham	2
Tower Hamlets	2
Hammersmith and Fulham	3
Wandsworth	3
Merton	4
Camden	6
Hackney	7
Havering	9
Lambeth	11
Westminster	12
Haringey	14
Hillingdon	15
Hounslow	21
Enfield	27
Barking and Dagenham	37
Brent	75
Ealing	No data
Newham	No data
Redbridge	No data
Waltham Forest	No data
London	256

Source: MHCLG statistics

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/852953/Statutory_Homelessness_Statistical_Release_Apr-Jun_2019.pdf

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WESTMINSTER CITY COUNCIL

STATEMENT OF DECISION

SUBJECT: HOMELESSNESS STRATEGY

Notice is hereby given that the Cabinet Member for Housing Services has made the following executive decision on the above mentioned subject for the reasons set out below.

Summary of Decision

1. That the Cabinet Member for Housing Services agreed the Homelessness Strategy 2019 – 2024 as set out in Appendix B of the report.
2. That the Cabinet Member for Housing agreed the Homelessness Strategy 2019 – 2024 Action Plan in Appendix C of the report and that noted it be updated regularly.
3. That the Cabinet Member for Housing Services delegated authority to the Director responsible for Housing to update the Action Plan in conjunction with the Cabinet Member responsible for Housing.

Reasons for Decision

The Homelessness Act 2002 and the Homelessness Reduction Act 2017 require local authorities to have in place a Homelessness Strategy informed by the results of Homelessness Review. A new Homelessness Strategy is also needed to ensure that the council is doing everything possible to prevent and respond to homelessness in the city.

Stuart Love, Chief Executive
Westminster City Hall
64 Victoria Street
LONDON SW1E 6QP

Publication Date: 19 February 2020

Implementation Date: 26 February 2020, 5.00pm

Reference: CMfHS/2019-2020/7

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Decision Maker:	Cabinet Member for Housing Services
Date:	19 February 2020
Classification:	General Release
Title:	Westminster Homelessness Strategy 2019 - 24
Wards Affected:	All
Key Decision:	Yes
Financial Summary:	The Strategy and Action Plan can be delivered within existing capacity within the Housing Operations Directorate
Report of:	Director of Housing, Acting Director of Policy & Projects

1. Executive Summary

A new Homelessness Strategy 2019 - 2024 (Appendix B) is needed, not only to meet legal requirements, but to also ensure the council is doing everything possible to prevent and respond to homelessness in the city. The proposed Strategy was informed by a Review of Homelessness which identified some key areas for focus.

- 1.1 The Strategy is based around a ten point plan which was widely consulted on, receiving 180 responses. Most respondents gave feedback using the Smart Survey/questionnaire and each of the ten points received over 80% support amongst those using this method. Some adjustments were made to the final Strategy following the consultation and the completion of a full Equalities Impact Assessment (Appendix D).
- 1.2 Overall the Strategy aims to do more to prevent homelessness by making residents, communities and organisations aware of the help and support on offer, rather than waiting for people to approach the council. It also focuses on tackling the main causes of homelessness in Westminster and its wider causes. There

are also proposals to improve services when homelessness cannot be prevented and an aim for council to become a leader in homelessness prevention.

2. Recommendations

- 2.1 That the Homelessness Strategy 2019 – 2024 in Appendix B is agreed.
- 2.2 That the Homelessness Strategy 2019 – 2024 Action Plan in Appendix C is agreed and that it is updated regularly.
- 2.3 That the Director responsible for Housing has the delegated authority to update the Action Plan in conjunction with the Cabinet Member responsible for Housing.

3. Reasons for Decision

- 3.1 The Homelessness Act 2002 and the Homelessness Reduction Act 2017 require local authorities to have in place a Homelessness Strategy informed by the results of Homelessness Review. A new Homelessness Strategy is also needed to ensure that the council is doing everything possible to prevent and respond to homelessness in the city.

4. Background, including Policy Context

The 2002 Homelessness Act requires local authorities to prepare and update a Homelessness Strategy, however the council has not had a Strategy for some time as it was exempt from this requirement from 2009 as an 'excellent authority'. The strategic approach to homelessness was however updated and reviewed regularly as part of the annual Supply and Allocation of Social Housing Report¹. A new homelessness policy framework² was also published in 2016 which is made up of:

- *A Private Rented Sector Offers Policy*
This sets out that an offer of a private rented tenancy may be made to any homeless household where the law allows. It aims to address the long waits homeless households experience in temporary accommodation for social housing, to improve outcomes for them and to reduce temporary accommodation costs.
- *An Accommodation Procurement Policy*
This Policy responds to the difficulties in procuring sufficient private rented housing for homeless households in Westminster and London. It includes an action plan for meeting demand, which is regularly updated. The Policy also

¹ www.westminster.gov.uk/housing-strategies

² www.westminster.gov.uk/housing-strategies

outlines procurement principles that will be followed for sourcing properties, both for temporary accommodation and for private rented sector offers.

- *An Accommodation Placement Policy*

This Policy sets out how households will be prioritised for properties, both for private rented sector offers and for temporary accommodation, in different locations. Its key principle is to ensure that health and welfare needs are taken into account when households are prioritised for housing in different locations.

4.1 *Rough Sleeping Strategy 2017 - 2022*

A Rough Sleeping Strategy³ was published in 2017 and which is being implemented. To develop the Strategy c.400 people and organisations were engaged with. As there is already a Strategy in place to address rough sleeping it is not covered in the Homelessness Strategy, other than to summarise it and to highlight key services for rough sleepers.

4.2 A separate strategy to address rough sleeping was considered necessary given it requires a different response to other forms of homelessness and because Westminster sees the highest number of rough sleepers on its streets, compared with other areas.

4.3 The Rough Sleeping Strategy 2017 – 2022 aims to reduce rough sleeping and address the harm it causes to individuals and communities. There are 3 priorities:

1. Where it is possible for us to do so, prevent people from rough sleeping in the first place.
2. When people do end up on the streets, provide a rapid response, support people to rebuild their lives and stay off the streets for good.
3. To protect communities from anti-social behaviour associated with rough sleeping and intervene to stop dangerous behaviour.

4.4 *Homelessness Review*

The Homeless Strategy 2019 – 2024 was informed by a Review of Homelessness⁴, which looked at, amongst other things, the national and regional policy context. It identifies how welfare reform has played a role in increasing homelessness, looks at the impact of the Homelessness Reduction Act 2017 and identifies some national policy uncertainties which could affect future levels of homelessness and responses to it. The Review also identifies those most affected by homelessness, the main causes of it and sets out how the council responds to it currently.

³ www.westminster.gov.uk/housing-strategies

⁴ www.westminster.gov.uk/housing-strategies

4.5 The Review identifies a number of areas of focus for the Homelessness Strategy to respond to the challenges ahead, such as: rising demand; late approaches to the Housing Solutions Service (i.e. when people are actually homeless, rather than when they are threatened with it); some lack of awareness of homelessness services; and the need to do more to prevent homelessness at a much earlier stage.

4.6 *Other council policies*

A range of other council policies were taken account of when developing the Homelessness Strategy such as the Housing Allocation Scheme⁵, the Tenancy Strategy and the Tenancy Policy⁶ and the Early Help Strategy 2019 – 22⁷ for families and children. The City Plan 2019 – 2040⁸ was considered which aims to increase affordable housing supply and also the City for All programme⁹ which aims for Westminster to be a City of Opportunity, where there are more affordable housing options and for it to have excellent local services.

4.7 *National and regional policy*

The Ministry of Housing, Communities and Local Government's 'Homelessness Code of Guidance for Local Authorities 2018' was also taken into account when developing the Strategy¹⁰ and the Mayor's London Housing Strategy 2018¹¹.

5. **Aims of the Policy/Summary**

The proposed Homelessness Strategy is based around 3 themes and a ten point plan and the whole council will be involved in its delivery alongside stakeholders, including members of the community:

Preventing people from becoming homeless in the first place:

1. Reach more people at risk of homelessness at an earlier stage, by building a network of prevention and support, working with partners and communities.
2. Make our services more visible through targeted information campaigns.
3. Proactively offer personalised support to those at risk of homelessness where possible, from helping them negotiate with their landlord to offering employment and skills training so they can increase their income.
4. Do more to identify and address the main causes of homelessness in Westminster and also the wider causes, through research and outreach.

Improving our services and response when people become homeless:

5. Make our housing services more transparent, accountable and accessible.

⁵ www.westminster.gov.uk/sites/default/files/housing_allocation_scheme_march_2018.pdf

⁶ www.westminster.gov.uk/housing-strategies

⁷ www.westminster.gov.uk/sites/default/files/early_help_strategy_2019_2022.pdf

⁸ www.westminster.gov.uk/cityplan2040

⁹ www.westminster.gov.uk/sites/default/files/city_for_all_booklet_2018_9.pdf

¹⁰ www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities

¹¹ www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf

6. Better communicate what we can and can't offer.
7. Ensure a range of accommodation is available for the homeless households that we have a housing duty towards, when homelessness cannot be prevented.
8. Review how people access supported housing and ensure our supported housing meets needs, now, and in the future.

Meeting the challenges ahead and having a homelessness system fit for the future:

9. Become a leader in the field of homelessness prevention proposing solutions and bringing key decision makers together to share information and ideas.
 10. Make the case for homelessness services and prevention work to be fully funded, by leading the discussion with Government and others on how the welfare system can work better for low income residents in central London, while also utilising every other funding source available to us.
- 5.1 The proposed Homelessness Strategy is accompanied by an Action Plan which gives more information on how the ten point plan will be delivered. The Action Plan will be regularly monitored and evaluated and a review of it will be undertaken when it has been in operation for one year.

6. Financial Implications

The Action Plan will be delivered within existing capacity within the Housing Operations Directorate. Officers from a number of services within Housing Operations will be involved, specifically from the Homelessness, Housing Operations Management and Temporary Accommodation Client Teams. The overall budget for these specific areas is as follows:

Service area	2019/20 Net Budget (£m)
Homelessness	5.743
Housing Management	0.356
TA Client team	0.243
Total	6.342

- 6.1 Whilst no additional budgetary requirements have been identified at the outset Finance will work closely with project leads to review progress and identify any risks or opportunities as they arise. The council receives Flexible Housing Support Grant (FHSG) to use to relieve homelessness. It is projected that £7.4m will be carried forward to the 2020/21 financial year.

7. Legal Implications

The Homelessness Act 2002 requires local housing authorities to review homelessness in their district and prepare and publish a homelessness strategy based on the review. As Westminster was deemed to be an excellent authority, it was exempt from this requirement. Analysis of housing needs and plans to prevent homelessness have instead been included in the Council's annual Supply and Allocation Reports. However, due to legislative changes, this

exemption no longer applies and the formulation of a homelessness strategy informed by a review of homelessness is now a statutory requirement for all councils.

- 7.1 The Homelessness Reduction Act 2017 requires local housing authorities to take reasonable steps to prevent homelessness (when anyone is threatened with it within 56 days) and to “relieve” homelessness (through maintaining or securing accommodation) for eligible applicants who are homeless or threatened with homelessness.
- 7.2 Under section 3(1) of the 2002 Act a ‘homelessness strategy’ means a strategy formulated by a local housing authority for: (a) preventing homelessness in their district; (b) securing that sufficient accommodation is and will be available for people in their district who are or may become homeless; (c) securing the satisfactory provision of support for people in their district: (i) who are or may become homeless; or (ii) who have been homeless and need support to prevent them becoming homeless again.
- 7.3 In formulating or modifying a homelessness strategy a local housing authority must have regard to: (a) its current allocation scheme under section 166A of the Housing Act 1996, (b) its current tenancy strategy under section 150 of the Localism Act 2011, and (c) in the case of a London borough council, the current London housing strategy.
- 7.4 The Homelessness Review informing the Strategy and referring to these considerations is referred to in this report.
- 7.5 The council is required to take its Homelessness Strategy into account in the exercise of its functions.
- 7.6 Under section 182 of the Housing Act 1996, local authorities must have regard to the Homelessness Code of Guidance for local authorities when exercising its functions relating to homelessness and prevention of homelessness.
- 7.7 The Rough Sleeping Strategy 2017 – 22 forms part of the council’s strategy for preventing homelessness in Westminster. It is referred to in the Homelessness Strategy and is set out in a separate document as the causes of rough sleeping are different and it requires a very different response to other forms of homelessness.
- 7.8 Section 3(8) of the 2002 Act requires the council to consult such public or local authorities, voluntary organisations or other persons as they consider appropriate before formulating or modifying a homelessness strategy. The consultation that has taken place is set out at section 9 of the report.

- 7.9 Housing Authorities must keep their homelessness strategy under review. A copy of the Strategy must be available for inspection at the council's principal office, or a copy provided to member of public if asked for, and under the Code of Guidance the Council should publish the Strategy and review documents on their website.
- 7.10 The council is also under a general duty, pursuant to s11 Children Act 2004, to have regard to the need to safeguard and promote the welfare of children within their area. The duty under section 11 would suggest a strategy that seeks to prevent children from becoming homeless which is one of the things the Homelessness Strategy seeks to achieve. It is likely to be in the best interests of children to be housed close to where they were previously living. Unfortunately, this is not always possible but the council's Accommodation Placement Policy ensures that applicants are prioritised for accommodation in or close to Westminster on the basis of need.
- 7.11 As a public authority, the council must take account of the provisions of the Human Rights Act 1998 and not act in a way which is incompatible with a Convention right. Under Article 8, any interference with the right to respect for a person's private and family life and home must be proportionate and Article 14 requires that there must be no unjustified discrimination within the scope of human rights on any grounds, such as sex, race, colour, language, religion, political or other opinion, national or social origin, association with a national minority, property, birth, or other status.
- 7.12 When making a decision the council must also have due regard to the Public Sector Equality Duty in s149 Equality Act 2010. S149(1) provides that, in exercising its functions, a public authority must have due regard to the need to (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the 2010 Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. S149(3) provides that having due regard to the need to advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it involves having due regard, in particular, to the need to (a) remove or minimise disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic; (b) take steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it; and (c) encourage persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low. S149(4) provides that the steps involved in meeting the needs of disabled persons that are different from the needs of persons who are not disabled include, in particular, steps to take account of disabled persons' disabilities. Section 149(6) provides that compliance with the duties in section 149 may involve treating some persons more favourably than others. By s149(7)

the relevant protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

- 7.13 An Equalities Impact Assessment has been carried out on the Strategy (see Appendix D) and a summary of the equalities implications is in Section 10.
- 7.14 The Strategy meets the overall requirements of section 3 of the Homelessness Act 2002 and the code of guidance chapter 2. The Strategy has been reviewed by Counsel.

8. Risk Management Implications

Table 1 below summarises how risk to the delivery of the Strategy will be mitigated.

Table 1: Risks and mitigations

	Risk	Mitigation	Residual Risk
1.	The Strategy aims for more households to get advice and support earlier. This could place a strain on homelessness services at a time when long term national funding for them (through the Flexible Homelessness Support Grant for example), and for the council in general (through its overall annual settlement) is uncertain and could reduce	The provision of earlier advice and support is aimed at reducing the number of approaches from people when they are actually homeless. It is easier and cheaper to respond before people become homeless The Strategy makes the case for a fair and sustainable funding model for local government and council aims to work with Government in this area	Medium
2.	Homelessness can be a result of wider socio and economic factors which are beyond the council's control, so levels could rise, despite the actions in the Strategy	The Strategy includes actions to address the wider causes of homelessness as a result of debt etc. Homelessness approaches and causes will be kept under review	Medium
3.	A number of actions in the Strategy will be delivered by the Early Intervention Trailblazer Service, which works with people before they are likely to approach the Housing Solutions Service. Since national funding expired the council has funded the service itself in the short term but its long term funding is uncertain	This has been taken into account in the Action Plan. If funding weren't to continue it is expected some of the ways of working would be incorporated into the main Housing Solutions Service. The Strategy also includes an action to seek external funding for homelessness projects	Low
4.	Private rented housing is a response to homelessness and affordable options can be limited in Westminster and London for people in receipt of benefits, due to Local Housing Allowance levels for example. The Strategy aims to increase use of the private	The Strategy makes the case for reforms to the benefits system and wants to work with Government in this area	Medium

	Risk	Mitigation	Residual Risk
	<p>rented sector which is likely to mean more households moving away from Westminster in the longer term</p> <p>The shortage of affordable private rented housing generally also means that the council may not be able to relieve homelessness for households it does not have a statutory rehousing duty towards</p>	<p>The aim of offering more settled private rented housing is to improve outcomes for homeless households so they spend less time in temporary accommodation</p> <p>The council currently tops up its allocation of Discretionary Housing Payment which helps to make private rented housing affordable, at least in the short term</p>	
5.	<p>Affordable housing is a response, amongst other measures, to homelessness and although the council has an ambitious target to deliver at least 1,850 new affordable homes by 2023, the delivery of these can depend on wider market factors beyond the council's control</p>	<p>Closely monitoring the housing market and schemes delivered through Section 106 agreements</p> <p>Continuing to strengthen relationships with developers and registered providers, by the council delivering schemes itself in some cases and by setting its own housing company to improve delivery</p>	Medium
6.	<p>The Strategy may not achieve its aim to have a different relationship with community and advice organisations and for them and other stakeholders to take a role in homelessness prevention. There were relatively few responses from community groups to the consultation, even though they were targeted</p>	<p>A resource is being dedicated to building up relationship with community groups</p>	Low
7.	<p>The Strategy involves a communications campaign about what the council can and can't offer, as people can have the expectation that they will be offered social housing, when supply is limited. This could result in people not approaching the service at an early stage when they are at risk of homelessness</p>	<p>The campaign will be positive in terms of what can be offered and the help and support available</p>	Low

9. Consultation

Ideas for the draft Strategy were discussed with some stakeholders before it was consulted on during July - September 2019. Links to the consultation were emailed to over 400 people and organisations and some hard copies were sent to key stakeholders. A summary leaflet was also widely distributed across the city and there was social media activity. Respondents were able feedback by using a Smart Survey, electronic questionnaire, hard copy questionnaire or by letter/email. They were asked to rank the extent to which they agreed with each

of the ten points and invited to make other comments about them and what may be missing from the draft Strategy.

- 9.1 A workshop on the Strategy was attended by interested residents, people directly affected by homelessness, registered providers, council officers and groups working with homeless households. It was also discussed at a Service Improvement Group meeting for homeless households living in temporary accommodation and at a resident engagement group meeting, attended by council tenants and leaseholders. Over 180 people and organisations commented on the draft Strategy and the majority of respondents (51%) were residents and thirty three of these had been directly affected by homelessness.

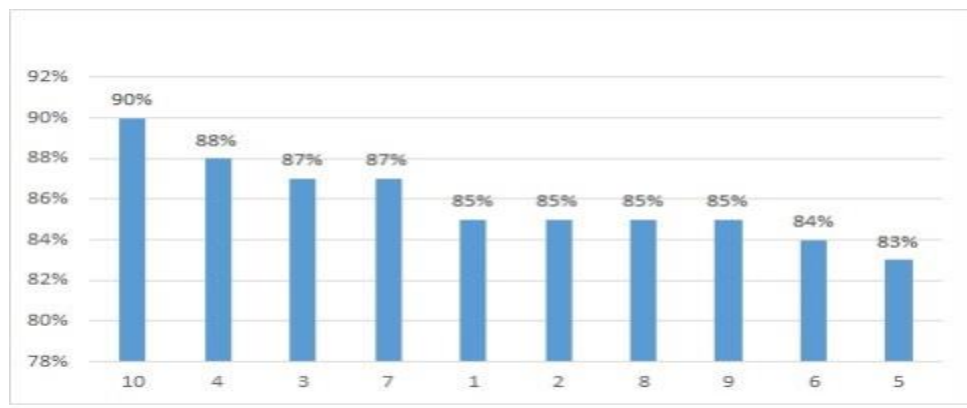
Table 2: Respondents to the Homelessness Strategy consultation

	No	Residents	Private landlord	Registered Providers	WCC staff member	Groups working with homeless households	Other Groups	Business Alliance	Health related	Other
Smart survey/feedback form	151*	93	5	9	15	24	13			13
Email/letter	16	6			1	3	1	2	2	1
Workshop	16	5		2		9				
Total	183	104	5	11	16	36	14	2	2	14
%*		51 %	2%	5%	8%	18%	7%	1%	1%	7%

* Some respondents ticked more than one box so the breakdown of respondents adds up to over 151 and the percentages are based on 204 responses

- 9.2 There was strong support for each of the ten points from those using the Smart Survey and questionnaire as chart 1 shows, with each receiving over 80% support. Point 10 was most supported and Point 5 the least. (See Section 5 for a description of each point).

Chart 1: Support for the ten points in the draft Homelessness Strategy



(Respondents who either strongly agreed or agreed with the proposals)

9.3 There was some criticism of the draft Strategy and suggestions on other areas it should cover which are summarised in table 3.

Table 3: Response to the draft Homelessness Strategy consultation

	Theme	Response
	<i>General</i>	
1.	Respondents often asked questions on how things would be done which indicates more detail is needed	No change , but there is more detail in the accompanying Action Plan
	<i>Services</i>	
2.	The Housing Solutions Service was criticised by a small number of respondents (mainly groups working with homeless households)	Change. The Strategy now includes an action to review Personal Housing Plans. Existing actions also help to ensure the service meets needs, such as by holding service user panels and setting up a Partnership Board which can hold it to account
	<i>Housing supply</i>	
3.	There was some criticism of the policy to offer homeless households private rented housing, but also support for offers being more tailored to where households are currently living	No change as this is already established policy which aims to improve outcomes for homeless households, through them being offered more settled accommodation more quickly
4.	There was some criticism that the Strategy lacks detail on the affordable housing targets and questions about whether the new homes will be affordable	Change. More information about affordable housing rent levels are now included in the Glossary and the Strategy now sets out how it intends to ensure intermediate housing is affordable to a range of households with different incomes
5.	There was a suggestion that empty properties could be used to accommodate homeless households	No change. The Homelessness Review sets out the difficulties of addressing empty properties in Westminster in that they generally don't meet the legal criteria for the council to

	Theme	Response
		manage them and use them for housing those in need
	<i>Causes of homelessness</i>	
6.	There were suggestions that the council could take a stronger lobbying position on other welfare reforms	Change. Changes to the Overall Benefit Cap and Universal Credit are now proposed
7.	Mental health was raised as a number of times, either as a cause of homeless or because more services were needed. There were also comments that the Strategy needed to make greater links between poor health and homelessness generally	Change. Information about a wider range of services will be included where appropriate in the community training sessions and there is an aim to improve referrals from health services to homelessness services
9.	There were some general comments that a more partnership approach could be taken and more could be done to address the causes of homelessness	Change. The Strategy now includes aims to review the way in which the council supports people with financial issues and to consider homelessness projects when it is seeking Social Value contributions from contractors. There is already emphasis in the Strategy on addressing the causes of homelessness and in delivering it in partnership
	<i>Other</i>	
10.	Rough sleeping and begging was raised a number of times. Some respondents asked if the council could do more and others thought it should be fully covered in the Homelessness Strategy	Change. The Strategy now includes a summary of what the council does to address rough sleeping (i.e. of the Rough Sleeping Strategy 2017 - 22)

10. Equalities implications

A full equalities impact assessment (EIA) has been carried out on the Strategy (see Appendix D). Households affected by homelessness have certain protected characteristics when compared with the Westminster population. In summary they more likely to be: from the Black, Arab or Other ethnic groups; aged between 25 – 44; claiming benefits; and be in households with children. There are also higher numbers of lone parents living in temporary accommodation. The EIA does however note that homeless customers are changing in that more single people, particularly men, are now approaching services.

10.1 Overall the impact of the Strategy is largely positive on the above groups, however the EIA did identify some potentially negative impacts, such as:

- Improving digital access to the Housing Solutions Service could have a negative impact on those less able to use computers, such as the elderly. This is mitigated by ensuring people can still use traditional means and by working with service users to test out new approaches

- Better communicating what the council can and can't offer could result in some people not approaching services if the offer doesn't meet their expectation. This has been mitigated by ensuring positive messaging and by discussing the material used with service users
- As set out in the Equalities Impact Assessment on the council's City Plan 2019 – 2040¹², focusing on new developments providing more intermediate than social housing, could impact negatively on homeless households, as they are more likely to have low incomes and qualify for social housing. This is mitigated by prioritising homeless households for intermediate opportunities and by ensuring that new intermediate housing meets a range of needs, including those with lower incomes. Any potentially negative impacts have to be balanced against other policy objectives, such as the council's aim to create a less polarised and more balanced housing market in the city.
- Increasing the number of offers into settled private rented housing may result in more homeless households moving outside Westminster, given the cost of housing locally. This is mitigated by already having policies in place to ensure those with the highest health and welfare needs are prioritised for homes in Westminster and by the aim to appoint 'community connectors' to help people settle into new areas. Overall the aim is to improve outcomes for homeless households by providing them with more settled accommodation more quickly.

¹² www.westminster.gov.uk/sites/default/files/cityplan2040_equalities_impact_assessment.pdf

BACKGROUND PAPERS

Accommodation Procurement Policy for Homeless Households (Updated July 2018)
www.westminster.gov.uk/sites/default/files/accommodation_procurement_policy_for_homeless_households.final_updated_8.8.2018_1.pdf

Accommodation Placement Policy for Homelessness Households (Updated Sept 2016)
www.westminster.gov.uk/sites/default/files/accommodation_placement_policy_updated_final16.8.2019_1.pdf

City Plan 2019 – 2040
www.westminster.gov.uk/cityplan2040

Early Help Strategy 2019 – 22
www.westminster.gov.uk/sites/default/files/early_help_strategy_2019_2022.pdf

Equalities Impact Assessment Addendum to the Integrated Impact Assessment
November 2019
www.westminster.gov.uk/sites/default/files/cityplan2040_equalities_impact_assessment.pdf

Homelessness Code of Guidance for Local Authorities Updated April 2019
www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities

Housing Allocation Scheme March 2018
www.westminster.gov.uk/sites/default/files/housing_allocation_scheme_march_2018.pdf

London Housing Strategy 2018
www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf

Private Rented Sector Offers Policy
www.westminster.gov.uk/sites/default/files/prso_policy_final_4.1.2017_1.pdf

Rough Sleeping Strategy 2017 – 22 Westminster City Council
www.westminster.gov.uk/housing-strategies

Westminster City Council: Review of Homelessness 2019
The review
www.westminster.gov.uk/housing-strategies

Westminster City Council Tenancy Policy
www.westminster.gov.uk/housing-strategies

Westminster City Council Tenancy Strategy
www.westminster.gov.uk/housing-strategies

For completion by the **Cabinet Member for Housing Services**

Declaration of Interest

I have <no interest to declare / to declare an interest> in respect of this report

Signed: _____ Date: _____

NAME: **Councillor David Harvey, Cabinet Member for Housing Services**

State nature of interest if any

.....
(N.B: If you have an interest you should seek advice as to whether it is appropriate to make a decision in relation to this matter)

For the reasons set out above, I agree the recommendations in the report entitled **Westminster Homelessness Strategy 2019 – 24** and reject any alternative options which are referred to but not recommended.

Signed

Councillor David Harvey, Cabinet Member for Housing Services

Date

If you have any additional comment which you would want actioned in connection with your decision you should discuss this with the report author and then set out your comment below before the report and this pro-forma is returned to the Secretariat for processing.

Additional comment:

.....
.....
.....
.....

If you do not wish to approve the recommendations, or wish to make an alternative decision, it is important that you consult the report author, the Director of Law, the Executive Director of Finance and Resources, and, if there are human resources

implications, the Director of People Services (or their representatives) so that (1) you can be made aware of any further relevant considerations that you should take into account before making the decision and (2) your reasons for the decision can be properly identified and recorded, as required by law.

Note to Cabinet Member: Your decision will now be published and copied to the Members of the relevant Policy & Scrutiny Committee. If the decision falls within the criteria for call-in, it will not be implemented until five working days have elapsed from publication to allow the Policy and Scrutiny Committee to decide whether it wishes to call the matter in.

Appendix A

Other Implications

1. Resources Implication

See the Financial Implications in Section 6 of the main report.

2. Business Plan Implications

Implementing the Homelessness Reduction Act 2017 was a focus of the Growth, Planning and Housing Business Plan during 2018/19.

3. Health and Wellbeing Impact Assessment including Health and Safety Implications

The Homelessness Review and Strategy identify that poor health, particularly poor mental health, can contribute to homelessness and the detrimental impact of homelessness on health and wellbeing. Given the Strategy includes actions to better prevent and respond to homelessness it will have a positive impact on health and wellbeing. In particular it aims to improve the response when someone at risk of homelessness has low to moderate mental health problems. It also aims to include information on health services, when appropriate, when training community groups and giving information on the services available for those at risk of homelessness.

4. Crime and Disorder Implications

There are no crime and disorder implications arising from the Strategy.

5. Impact on the Environment

There are no impacts on the environment arising from the Strategy.

6. Staffing Implications

Most of the actions in the Strategy can be completed by existing staff. As set out in Section 8 the funding for the Early Intervention Trailblazer Service is not long term. If the Service doesn't continue any outstanding actions, which were to be completed by them, will be completed within existing resources.

7. Human Rights Implications

See Section 7 on legal implications.

8. Energy Measure Implications

There are no energy measure implications arising from the Strategy.

9. Communications Implications

The Strategy involves communications campaigns to raise awareness of homelessness services and on what they can and can't offer. The Homelessness Strategy and Action Plan will be on the council's website and consultees will be alerted. A small number of hard copies will be distributed.

Homelessness Strategy

2019-2024





Foreword

Having a place to call home is one of the most basic human necessities, and yet in Westminster we face some of the toughest challenges in preventing homelessness. Westminster City Council has ambitious goals and priorities as a 'City for All', which requires supporting some of our most vulnerable residents, especially those who are at risk of or in a state of homelessness.

To address current and future challenges that too many of our residents face, we have developed a new Homelessness Strategy. This emphasises early intervention and homelessness prevention through personalised help and assistance in a much more holistic way.

In this strategy, we not only set out how our housing services will change to meet these challenges, but also how the whole council will be involved. This ranges from setting ambitious targets to increase the supply of affordable housing to ensuring all our front-line services identify those at risk of homelessness - and refer them for support at the earliest opportunity.

This need for a change goes beyond the council however and requires the involvement of communities, key stakeholders and organisations across Westminster that are well placed to help prevent homelessness. This new strategy sets out new ways of working together and I would like to use it to help break down some of the barriers that we know exist and to be clearer about what our council services can offer.

The publication of this strategy is an exciting opportunity to be bold and innovative by working together to prevent and respond to homelessness most effectively.

Councillor David Harvey,
Cabinet Member for Housing Services

About this strategy

Becoming homeless is devastating for people and families and it can have long lasting impacts on the health and wellbeing of those affected. The council already does much to prevent and to respond to homelessness. During 2018/19 we spent around £23 million on homelessness and rough sleeping services and gave advice to nearly 4,800 people. We also provide temporary accommodation for more than 2,700 households.

This strategy sets out areas where we want to do things differently to prevent and respond to homelessness. To develop these ideas, a full review of homelessness in Westminster was carried out which looked at all our services, those affected by homelessness, its causes and the resources dedicated to it. Officers from across the council contributed to the review and some of its findings are included in this strategy. It can be found in full at: westminster.gov.uk/housing-strategies

A draft strategy was also consulted on between July and September 2019 and there was strong support from the 180 people and organisations that responded to the proposals. Their feedback has also helped to shape the final strategy.

The purpose of this strategy is to set out a plan for:

- Preventing homelessness in Westminster.
- Securing that sufficient accommodation is and will be available for people in Westminster who are or may become homeless.
- Securing the satisfactory provision of support for people in Westminster who are or may become homeless or who have been homeless and need support to prevent them becoming homeless again.

This Homelessness Strategy is also accompanied by an Action Plan which gives more information on how we will deliver the ten-point plan over the next five years. This action plan will be updated regularly and can be found at: westminster.gov.uk/housing-strategies

A key focus in preventing homelessness is to reduce rough sleeping. Rough sleeping is the most visible form of homelessness in Westminster and those affected are some of the most vulnerable in society. The council's strategy for reducing rough sleeping is contained in its Rough Sleeping Strategy 2017 – 2022, which it adopted in 2017. Because the causes of rough sleeping are different and it requires a very different response to other forms of homelessness, it is not covered fully in this strategy. The Rough Sleeping Strategy is summarised on pages 31–33 and can be found in full at: westminster.gov.uk/housing-strategies

Our vision: where we want to be

We want Westminster to be a city where our most vulnerable residents get the help they need when they need it, not when it is too late.

We want a new relationship with our community, as they too can play a role in helping to address homelessness, making sure everyone knows about our services and what they offer.

Our relationship with those who are homeless needs to be different, so we are not seen to be a council that can't help, but one that works with people and families to find solutions. We want a better and more collaborative relationship with other organisations which help homeless households, not one which is 'us' and 'them'.

We want Westminster to be a 'City for All' and our ambitious affordable housing programme will deliver at least 1,850 new homes by 2023. While we are doing everything we can to increase affordable housing supply in Westminster, we know that it will never meet demand and so we'll strive to also find other sustainable options for homeless people so they don't live in limbo for years in temporary accommodation.

All this requires change to the way we work and world-class services which are trusted, easy to use, compassionate, frank and honest.

This strategy is based around a ten-point plan which lays out how Westminster City Council will work towards this vision.

Our ten-point plan in summary

We'll do more to prevent homelessness by proactively making residents, communities and organisations aware of the help and support on offer, rather than just waiting for people to approach us. Through training and identifying trusted people living in areas where there is more likely to be homelessness, we'll work towards the community also having a role in preventing it.

Tackling the underlying causes of homelessness head-on is key and needs the whole council involved – including developing the most ambitious programme of affordable housing in a generation, better using data to identify those at risk or offering practical, bespoke support to our residents, including help finding work. We'll also talk to Government about how the benefit system can work better in central London.

We know our housing services can sometimes be difficult to understand and we'll strive to make them more transparent and accountable by setting up a new Partnership Board and by asking users of our services for their feedback. This will also involve better explaining the realities we face, including why every homeless household can't be offered a social home and why some accommodation offered is outside Westminster. We'll be up-front with our residents about the help we can provide and also about their role in preventing homelessness.

We'll work towards Westminster becoming a leader in homelessness prevention and play a key role in shaping the national debate on homelessness. We believe that by working together, in partnership with Government and other local authorities, we can share best practice and identify innovative methods to better serve our residents and support them to reach their potential.

Our ten-point plan in summary continued

Preventing people from becoming homeless in the first place:

1. Reach more people at risk of homelessness at an earlier stage, by building a network of prevention and support, working with partners and communities.
2. Make our services more visible through targeted information campaigns.
3. Proactively offer personalised support to those at risk of homelessness, where possible, from helping them negotiate with their landlord to offering employment and skills training so they can increase their income.
4. Do more to identify and address the main causes of homelessness in Westminster and also the wider causes, through research and outreach.

Improving our services and response when people become homeless:

5. Make our housing services more transparent, accountable and accessible.
6. Better communicate what we can and can't offer.
7. Ensure a range of accommodation is available for the homeless households that we have a housing duty towards, when homelessness cannot be prevented.
8. Review how people access supported housing and ensure our supported housing meets needs, now, and in the future.

Meeting the challenges ahead and having a homelessness system fit for the future:

9. Become a leader in the field of homelessness prevention, proposing solutions and bringing key decision makers together to share information and ideas.
10. Make the case for homelessness services and prevention work to be fully funded, by leading the discussion with Government and others on how the welfare system can work better for low income residents in central London, while also utilising every other funding source available to us.

The ten-point plan in more detail

Preventing people from becoming homeless in the first place



1.

Reach more people at risk of homelessness at an earlier stage, by building a network of prevention and support, working with partners and communities.

We will do this by:

- **Co-producing a 'Homelessness Prevention Charter'** with community groups, registered providers and others asking them to give a commitment to help identify those at risk of homelessness, make people aware of our homelessness and associated services and to have a role in homelessness prevention themselves.
- **Recruiting 'Community Champions'** so that there are people with housing and homelessness knowledge in the community, who can also offer support and information. These 'Community Champions' could encourage households to approach the council earlier, rather than at crisis point or give support themselves.
- **Holding events in the community and offering a rolling programme of training to resident, faith and community groups in a range of different venues, about homelessness and our services.**

The aim is to explain what our services can offer so people will approach them at an earlier stage and to explore how we can all work together to prevent homelessness. They can also provide information on wider services, such as health and debt advice services, which will help to prevent homelessness. The events and training will firstly be in areas where there are higher levels of homelessness, and with groups that evidence shows are more at risk of it, or that don't generally use council services. These will then be rolled out more widely.
- **Continuing to build referral routes to our services, for those working with people at risk of homelessness,** going beyond those organisations there is a statutory duty to work with. In particular we'll work towards improving referral routes with health providers.

2.

Make our services more visible by targeted information campaigns.

We will do this by:

- **Utilising local media and council-owned channels of communication to increase the visibility of our services.** We will target areas of Westminster where residents are most vulnerable to homelessness and reach out through all available channels, including newsletters sent by our housing services to residents on our estates and via social media and other channels.
- **Publicising success stories** to demonstrate how our services have helped people and by **improving the housing information on our website.**

3.

Proactively offer personalised support to those at risk of homelessness, where possible, from helping them negotiate with their landlord to offering employment and skills training so they can increase their income.

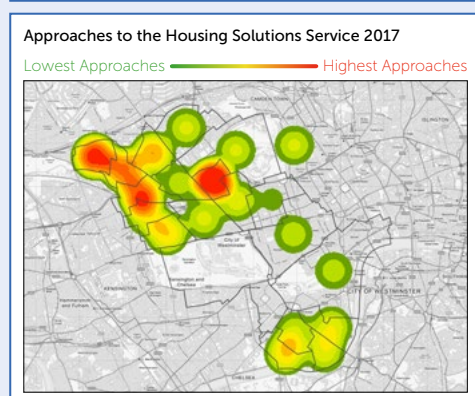
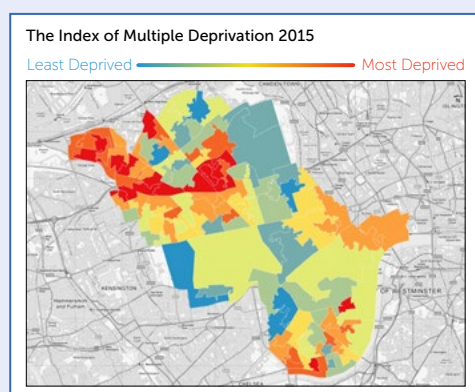
We will do this by:

- **Looking for ways to continue and grow the approach taken by the Early Intervention Trailblazer Service in the longer term.** The team works with people that are at risk of homelessness long before they would approach the council's Housing Solutions Service. They were funded by a Government grant which has run out and the council is continuing to fund them in short term to maximise learning from the project.
- **Using data and 'flags' where possible to identify people that could become homeless and proactively offering them support,** rather than waiting for them to approach the council. In Westminster, where rents are high, we know that for some, if they lose their job or have a reduction in benefit payments, it is a warning sign that they could lose their home.
- A range of data could be used such as benefit data provided by the Department of Work and Pensions and information held by other parts of the council. This data could be used to help identify someone that might be finding it hard to make ends meet, and then we can proactively offer them help, which could be help to increase their income or to find a job. Data protection issues will obviously need to be considered. We will also explore other non-financial warning signs that could be used to indicate that housing advice is needed.

Why?

We know that certain groups and communities are more at risk of homelessness. In Westminster, women, households with children, lone parents and Black and Middle Eastern households have been more likely to approach our services, although the number of single people, particularly single men, approaching is now growing. Homeless households are also more likely to have low incomes, although they are often in work and 50% of households in temporary accommodation are in some form of employment.

Also, there is a clear relationship between areas of deprivation in Westminster and homelessness as shown below.



The impact of homelessness can be significant, for example research by Shelter in 2006 found that children who had been in temporary accommodation for over one year were 3 times more likely to develop mental health problems, compared with non-homeless children.¹ A more recent report in 2017 by Shelter also found that children's behaviour can change when they are in temporary accommodation.²

A 2017 report by the Local Government Association also suggests there are high levels of mental health problems, self-harm, drug and alcohol use amongst young homeless people and that they are at risk of being drawn into a lifetime of being in the criminal justice, social care or health system.³

Although the council does much to prevent homelessness when people approach the Housing Solutions Service, more could be done to explain it and other available services and to encourage people at risk to seek help at an earlier stage. Some of those responding to the consultation on the draft strategy highlighted the link between people having low to medium mental health problems and homelessness and thought that more could be done to make people aware of support services available.

While we don't yet know if this is a long term trend, even though greater numbers of single people are now approaching our service it is often at a late stage when it is too late to prevent homelessness.

Our aim is to reach every resident who is at risk of homelessness at the earliest possible opportunity and to support them to avoid, where possible, the stress and long-term impact of it. In law we need to give advice and support to people threatened with homelessness within the next 56 days, however our longer-term aim is for this to happen much earlier.

In 2016, the council was awarded funding from Government to run an Early Intervention Trailblazer Service, which includes research into homelessness and a team of officers based out in the community, to work with people at risk of it, at an early stage (before the 56 days required by the law). The evidence so far suggests that this 'early prevention' approach is working and 99% of the 220 people the team worked with did not go on to make a homelessness application.

1 http://england.shelter.org.uk/___data/assets/pdf_file/0016/39202/Chance_of_a_Lifetime.pdf

2 http://england.shelter.org.uk/media/press_releases/articles/as_schools_break_up_for_the_christmas_holidays_new_shelter_report_reveals_the_devastating_impact_of_homelessness_in_the_classroom

3 http://local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF

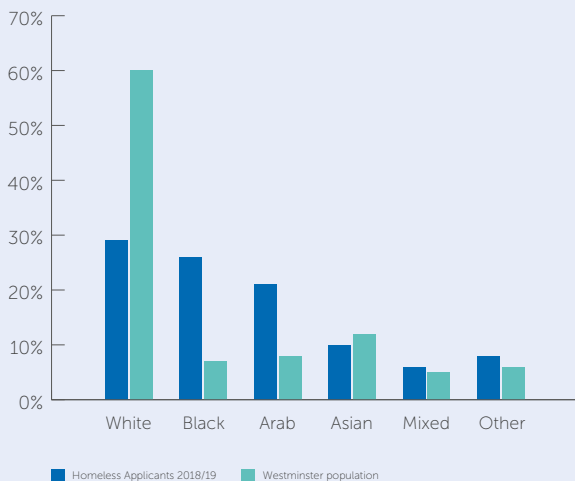
The team works holistically with people at risk, giving advice on employment, debt, education and voluntary opportunities and they also help people to find private rented housing. They run surgeries and attend drop in sessions across the city.

Research carried out for this project shows that council services were not always well known about in some communities. It also found that some people that had been homeless felt a sense of shame about their situation which could result in them not asking for help and that certain well connected members of the community, community groups and religious establishments were trusted and well placed to play a role in homelessness prevention.

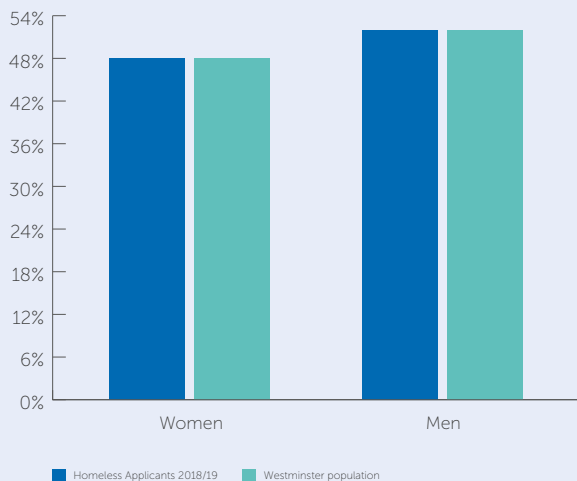
We need to work hand in hand with communities to support people at risk of homelessness, so that they get the help they need as early as possible. We aim to do this by working with them to raise awareness about our services and also by recognising the role that they also can play when people do not formally approach the council for help. This could be through sharing similar stories that others have gone through, reassuring people and providing them with useful information. This is particularly important, as it is recognised that some rely on friends to help them find places to live, preferring to go by word-of-mouth rather than approaching the council.

Homeless applicants 2018/19

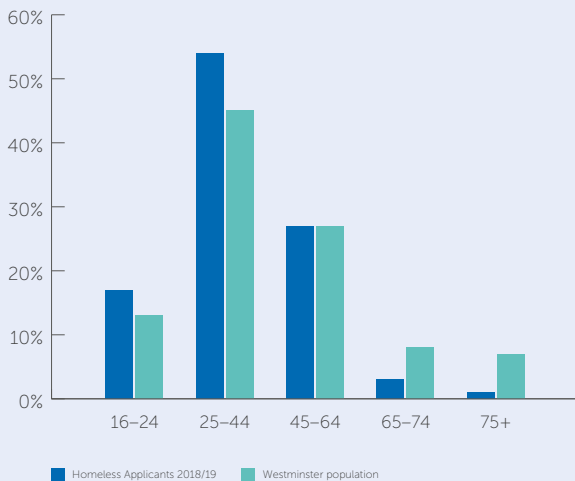
Homelessness and ethnicity



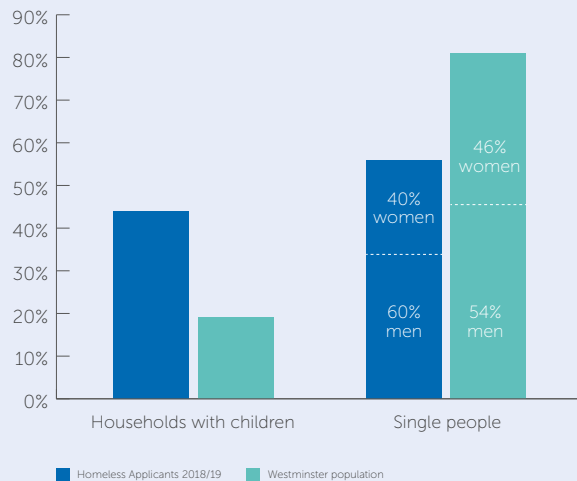
Homelessness and gender



Homelessness and age



Homelessness and household composition



What we do already to prevent homelessness

- **Giving advice about housing in the community** in our Family Hub, where a range of services for families are located and the Early Intervention Trailblazer Service also gives advice in different places in the community.
- **Developing a Personal Housing Plan with everyone eligible at risk of homelessness that approaches the Housing Solutions Service**, setting out the actions both they and the council will take to help prevent them from becoming homeless. 966 plans were completed in 2018/19.
- **Offering mediation when someone is asked to leave their home by family or friends** if it has been caused by a disagreement. Even if this doesn't result in the person being able to stay in the long term, it can enable them to stay in their home while alternative housing is found. Mediation is also offered in some cases where there is relationship breakdown with a spouse or partner, where it doesn't involve domestic violence.
- **Preventing homelessness from the private rented sector by negotiating repayment agreements with landlords** if there are rent arrears, advising about Discretionary Housing Payment and offering Disabled Facilities Grants if the property has become unsuitable due to the tenant having a disability. We also work with landlords to ensure good housing conditions and take legal action if they are evicting a tenant unlawfully.
- **Helping people to find alternative private rented housing** if homelessness cannot be avoided and offering private landlords rent deposits and incentives in some cases. In 2018/19 we prevented 238 households from becoming homeless in this way.
- **Signposting those at risk to a range of services which may help to prevent homelessness**, such as the Westminster Employment Service or the Environmental Health Team that deal with poor quality conditions in the private rented sector.
- **Monitoring repeat homelessness** when people approach the local authority as homeless a number of times. Looking at a sample of cases, no incidents were identified during 2018/19.
- **Being aware of the services available for people with mental health problems** and providing information and making referrals, where appropriate.

4.

Do more to identify and address the main causes of homelessness in Westminster and also the wider causes, through research and outreach.

We will do this by:

Addressing homelessness from the social sector

- Letting grown-up family members living in social housing, with their parents or grandparents, who are at risk know about the housing options available through targeted mail outs and in any one to one conversations we have with them and their families. We want to do more to inform them about intermediate housing options as they will increase over the next few years and as they have priority for them and also about private rented options. The aim is to help this group move in a planned way, before a crisis point is reached, and to do this we firstly need to better understand them, so we will carry out research into those at risk in our own stock and share the findings with registered providers.
- Continuing to use our powers to intervene to help prevent unlawful or retaliatory evictions that can occur when enforcement action is taken and which may increase as a result of the Fitness for Human Habitation Act 2018, if the tenant has complained or is taking action against their landlord due to poor conditions. (At the time of writing, Government had proposed to abolish 'no fault' evictions in the sector).

Addressing homelessness from the private rented sector

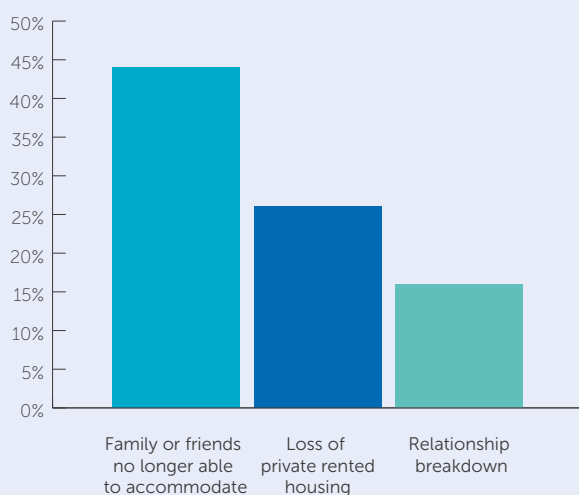
- Working with landlords and lettings agents by firstly running a small pilot to understand how best to engage with them and to build an early alert system so they contact us, with their tenant's consent, when rent arrears start to occur or when they may be leaving the market. Using learning from this pilot, this approach can then be rolled out more widely.
- Better understanding the reasons behind relationship breakdown and if there is a role for the council in helping to prevent it. This will involve research and the Housing and Children's Services teams working together, as for example there may be opportunities through the national Reducing Parental Conflict Programme, which the council is participating in.

Addressing the wider causes of homelessness

- **Working with the organisation 'Mybnk', that helps young people to take charge of their money, to provide financial capability training to young people aged 18–25 that are homeless or at risk of it.** After this we will then consider if this approach could be rolled out more widely to other groups.
- **Working with the Westminster Youth Council and Children's Services to run awareness sessions in schools and youth centres,** if possible, about the factors that can lead to homelessness, its impact and on what can be done to prevent it.
- **Ensuring employment and other support is always part of Personal Housing Plans.** Also, as part of our wider review of Personal Housing Plans ensuring they also cover information about health services, where appropriate.
- **Letting private and social landlords know about our employment services** and by ensuring our employment coaches can identify and refer those at risk of homelessness for support.
- **Supporting vulnerable households with the move onto Universal Credit** by working closely with the Department of Work and Pensions, and by having a coordinated approach across the council, so we know when the transfer is happening and by letting those affected know about support available.
- **Looking at ways in which the council could work differently in order to better help people manage their finances.** We want to focus particularly on supporting people with mental health problems.

Why?

Main causes of homelessness 2018/19



The main recorded cause of homelessness in Westminster is eviction by family or friends and this was behind 44% of applications in 2018/19 and it has been the main cause for many years. Due to the shortage of affordable housing locally, 'households within households' can form, often in the social sector, and family tensions and overcrowding can result in them being asked to leave. Often, they don't approach the council's Housing Solutions Service until a late stage when their homelessness is harder to prevent or delay.

More needs to be done to let them know about their housing options and any support to move. As part of the council's plans to increase affordable homes in Westminster, more intermediate housing will be developed over the next few years and overcrowded sons and daughters of council tenants have priority for this. The council is also well placed with its knowledge of the private rented sector in London to give advice on where this type of housing is more affordable and could offer help to move at a stage when tensions start.

The second biggest cause of homelessness is the loss of a private rented tenancy and this was the reason behind 26% of applications in 2018/19. Welfare reform continues to play a significant role here. Westminster has the largest private rented sector in England with an estimated 53,000 properties and it includes some of the highest rents in London.

The Early Intervention Trailblazer Service has found a number of people struggling in the sector with rent arrears accumulating or people living in poor quality housing, but afraid to complain to their landlord. More could be done to work with landlords and lettings agents at an earlier stage to prevent homelessness. While this may not always result in someone remaining in their private rented home in the long term, earlier intervention can give them more time to move in a planned way.

The third biggest cause of homelessness is due to relationship breakdown and it was behind 16% of applications in 2018/19. Alone, domestic violence accounted for 11% of homelessness. Relationship breakdown is one of the most complex causes of homelessness to address and clearly in many cases it is not appropriate to try and prevent it. However, there may be situations where support can be offered at an early stage when tensions in a relationship start, where for example they are identified through close work with a family for other reasons.

Data on the causes of homelessness tends to focus on the reason for the loss of the last home, which is often only part of the reason why someone has become homeless. The reality can be far more complex and be the result of much wider factors such as unemployment, low income, the shortage of affordable housing, debt or having a mental health problem.

A report by the Local Government Association 2017 found that mental health problems are more than twice as high amongst homeless people as within the general population⁴ and some of those responding to the consultation on the draft strategy emphasised the role of debt and mental health problems as causes of homelessness. Research by Crisis found that homeless people are five times less likely than the wider population to be in employment. Often there is no one single cause of homelessness and there are many contributory factors.

⁴ http://local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF

What we do already to address the main and wider causes of homelessness

- **Setting an ambitious target to develop at least 1,850 new affordable homes by 2023, which is three times higher than what has been delivered in the past.** This includes a programme of estate renewal and developing new homes on 'infill sites' on existing estates. Higher targets are being set through planning policy (our new City Plan), so 35% of all newly developed housing will be affordable in future. These new homes will be both social and intermediate and will result in a better range of housing options for people in Westminster that can't afford market housing.
- **Making the best use of our social housing** by offering incentives for under occupiers in council homes to downsize and by offering fixed term tenancies, so under occupiers can be offered smaller homes when they are renewed.
- **Prioritising overcrowded sons and daughters of council tenants for intermediate housing** so they have alternative housing options locally.
- **Offering employment support for residents of all tenures, through the Westminster Employment Service.** During 2018/19, employment coaches worked with 749 people and helped 296 people into work and there is a specialist service which works with those at risk of homelessness.
- **Offering a range of advice, including financial and debt advice through a contract with the Westminster Advice Partnership.** During 2018/19 advice was given to 1,000 households.
- **Adding to our allocation of Discretionary Housing Payment (DHP) from Government,** which is funding to help bridge the gap between benefit levels and rents, for example due to the Local Housing Allowance caps. While DHP is not a long-term solution, it can enable someone to remain in their home while they look for alternative housing. It can also help with the move into work by paying benefit at a higher rate for a temporary period.
- **Establishing a Housing Standards Taskforce** to gather and share intelligence on problematic private landlords in Westminster and using it to ensure coordinated action against the worst landlords. Scoping is underway on whether there is a case for a discretionary licensing scheme in Westminster.
- **Supporting the principles of the Government's proposals to address retaliatory evictions** through reforming private rented tenancies, as long as it doesn't have a negative impact on the supply of private rented housing for homeless households.
- **Responding to more than 1,600 enquiries annually about poor conditions in the private rented sector and taking enforcement action where needed.** On average around 300 enforcement notices are served on private landlords each year.
- **Informing tenants about the Fitness for Human Habitation Act 2018** in our communications with them, so they know that they can also take action against their landlord for poor conditions.

Improving our services and response when people become homeless



5.

Make our housing services more transparent, accountable and accessible.

We will do this by:

- **Setting up a new Partnership Board** which meets annually, made up of people that use our homeless services, members of the community and other stakeholders such as groups working with homeless households and health services. The aim of the Board will be to get views on our services and to hold us to account. It will also enable the council to explain the environment in which we operate and some of the decisions we make.
- **Carrying out 'mystery shopping' exercises**, possibly with the help of people that have used our services to get their perspective and to better understand the type of service we offer and how it could be improved.
- **Seeking the views of those using the service to guide us, using innovative methods**, for example through setting up service user panels, seeking feedback by text and through exit interviews.
- **Improving digital access to the Housing Solutions Service**, so more people can fully apply online, while also ensuring the requirements of people who need to use more traditional methods are met.
- **Becoming more 'person centred' to improve peoples' experiences.** This will involve ensuring the service is easy to navigate. It will also ensure that those using the service are at its heart, are involved in decisions made and that staff are well trained to support people in difficulty and crisis. Areas of focus will be:
 - » Aiming for the service to become accredited by the Domestic Abuse Housing Alliance to ensure those affected get the best response.
 - » Applying the learning from our Making Every Adult Matter (MEAM) pilot and then rolling it out across our services to help them to better serve vulnerable people at risk of homelessness. We recently joined the MEAM network which helps to coordinate services for people experiencing multiple disadvantage. We are currently piloting this approach for ten people, providing them with a single point of contact to help guide them through the services they need.
 - » Training front line staff in 'trauma informed working' so they better understand what homeless people may have gone through and are in a better position to support them.
 - » Training front line staff on 'making every contact count' which involves them better understanding the right questions to ask, to be in the best position to support someone and to help avoid them being referred to multiple services.
 - » Looking at ways of improving our response when someone has low to moderate mental health problems.

6.

Better communicate what we can and can't offer.

We will do this by:

- **Carrying out a communications campaign about our services and what people can expect from them** using different channels of communication and targeting areas of Westminster where people are more likely to be homeless. This will involve publishing 'what you can expect' leaflets and distributing them widely. Not only do we want everyone to know about the

support and help available to them, but also about the realities of the housing market and why being homeless will increasingly not result in the offer of social housing, but an offer of private rented housing. We also want to communicate the message that addressing homelessness requires the person or household affected and the council to work together to find a solution.

Why?

Research carried out with a small number of people using the Housing Solutions Service has shown that there is sometimes mistrust of it and that it is hard to understand. People can on occasion feel that they are not listened to.

We know that the service does not sometimes meet peoples' expectations particularly around the types of properties offered and their locations. A 'review' of decisions made is often requested, for example during 2018/19 there was a review request about the suitability of 11% of temporary accommodation offers and this rose to around 23% when these offers were outside Westminster. People understandably would like to be offered a social home quickly, but are often unaware of the shortages in supply. Also, on occasion people can feel it is wholly the council's responsibility to prevent their homelessness, however the best results are achieved when they also play a role and everyone works together to find solutions.

We need to work to help change these expectations so everyone knows about the reality of housing available in Westminster, and that while we may not be able to offer everyone a social home, there are a wide range of services available to help them into stable accommodation, especially if they approach us early. We also recognise that more needs to be done to explain the Housing Solutions Service, how decisions are made, its points of access, the context in which it operates and to hold it to account.

Developing a Personal Housing Plan, setting out the actions everyone will take, including the person directly affected, is now part of the way the council responds to homelessness and is a legal requirement. We recognise this is a culture change and we want to get the message across at an early stage that Personal Housing Plans are part of the service.

7.

Ensure a range of accommodation is available for the homeless households that we have a housing duty towards, when homelessness cannot be prevented.

We will do this by:

Affordable housing

- **Continuing to make developing more affordable housing a priority for the council**, setting a new challenging target, when our current one is met in 2023 and constantly looking for new ways to do more.
- **Ensuring some of the new intermediate housing developed is affordable to households with lower incomes**, by setting 'affordability thresholds' in supplementary planning guidance. These will be linked to the actual incomes of those on the intermediate housing list.
- **Reviewing the support to move offered to under occupiers in council housing**, so more larger council homes can be freed up for homeless households and others in housing need.

- **Carrying out a review of our allocation scheme** to consider how it may work better for all households in need, including homeless households.

Private rented housing

- **Regularly updating our action plan** setting out how we will procure enough private housing for temporary accommodation and for settled private rented offers for homeless households and continuing to look for innovative ways to increase supply.
- **Developing a Temporary Accommodation Reduction Strategy** which looks at, amongst other things, how to reduce the time households spend in temporary accommodation and how to provide them with more settled housing sooner.

- **Increasing the number of households that move into settled private rented sector accommodation**, and, where these homes can't be in Westminster due to high costs, do more to support people moving to other areas to help get them established in their new community. This will involve:
 - » Offering households more choice over the location of these homes, by for example looking for properties in areas where people may have family or friends, or they are already living in temporary accommodation. This will help avoid the disruption of having to move to a new area or one where they don't know anyone.
 - » Do more to explain why these homes are generally outside Westminster, due to the cost of private rented housing locally and benefit levels.
 - » Recruiting 'Community Connectors' in local areas to help people to settle in if needed, to explain local facilities and services, possibly delivered through a social impact bond where social investors make a contribution to the costs. These 'Community Connectors' could give people face to face support and help households to build new networks and feel settled in an area.
- **Continuing to invest in innovative schemes**, which offer households longer term private rented homes, with support, building for example on the Real Lettings scheme which has involved £30 million of investment and offers homes with follow on support from St Mungo's.

Why?

Average waiting times in temporary accommodation for social housing				
Studio	1 bed	2 bed	3 bed	4/4 plus bed
2.5 years	1 year	10 years	16 years	34 years
(Different waiting times apply depending on circumstances)				

Affordable housing, both social and intermediate, is an important way of responding to homelessness and the council is on track to meet its ambitious affordable housing target of at least 1,850 new homes by 2023. However, evidence suggests that this won't be enough to meet the needs of homeless households and other groups with priority for housing. Currently there are nearly 4,000 households with priority for social housing (of which 2,700 are homeless) and 3,000 for intermediate housing.

Understandably some people feel that waiting for a social home is better than moving into the private rented sector, but the reality is that households can wait over ten years for a social home and this wait increases for larger households. Although the council is doing everything it can to increase affordable housing in Westminster, it is likely that supply will never meet demand for it.

During these waits for social housing, homeless households are living in temporary accommodation, which is often outside Westminster and can be the least secure form of housing. As highlighted on page 11, the evidence suggests that living in temporary accommodation can have a serious impact on health and wellbeing in the long-term and it also costs the council more than £4m annually, as national funding doesn't meet costs.

In 2017 the council moved away from always offering homeless households a social home and introduced a policy of making private rented sector offers. The approach provides a more stable home more quickly than waiting for social housing in temporary accommodation for many years. During 2018/19, 82 households moved into the private rented sector from temporary accommodation.

Although the starting point is always to look for private rented homes in Westminster, the high cost of market rents here, combined with Local Housing Allowance levels not covering market rents, means that, although 24% of offers were in Westminster or adjoining boroughs, 76% were outside those areas. Only 5% however were outside London in Surrey or Berkshire.

A review of the policy after one year found that most households would prefer a social rented home and that more could be done to explain the policy, the reasons behind it and to offer more choice over the location of homes and more support when moving to a new area. It also found that more could be done to make these offers in locations where households were already living in temporary accommodation (54% is outside Westminster). The review recognised that more needs to be done to help people link in with their new community to feel settled.

8.

Review how people access supported housing and ensure it meets needs, now, and in the future.

We will do this by:

- **Developing an online referral system for supported housing**, so more partners we work with can make referrals into it and so there is more transparency on how it is offered.
- **Reviewing the needs of young people** to ensure suitable accommodation for different needs, e.g. care leavers, unaccompanied asylum-seeking children and those at risk of homelessness.
- **Working with our specialist providers to ensure dedicated support for survivors of domestic abuse.**
- **Reviewing the sheltered housing we commission from registered providers** to ensure it meets needs.
- **Re-procuring our offender services**, considering how we can better meet the needs of young offenders and reduce reoffending.

Why?

Offering supported housing, where the accommodation includes some care and support, plays a role in preventing homelessness as it helps to avoid tenancies breaking down and as there is a clear move on path to other forms of housing. It is also a response to homelessness when someone approaches our service and when it is clear that they are not able to live independently.

Supported housing in Westminster provides homes to young adults, people with mental health problems, ex-offenders, women escaping domestic violence, rough sleepers and older people. It is commissioned jointly across the council and with the health service and provided by specialist providers. A close look at these services and the challenges ahead has resulted in the above priority areas being identified to focus on over the next four years.

What we do already to respond to homelessness

- **Re-tendering and restructuring the homelessness service** in 2017 to create a unique Housing Solutions Partnership, which brings experience from the statutory and voluntary sectors together.
- **Providing temporary accommodation for 2,700 homeless households** and by having policies in place to ensure there is enough accommodation to meet needs and that it is as close to Westminster as possible. There are also policies in place to ensure those with the highest needs are prioritised for temporary accommodation in Westminster or in adjoining boroughs.
- **Offering social housing** and awarding those with a longer connection to Westminster, and that are working, enhanced priority for it. As already set out on page 17 the council is doing everything it can to increase new affordable housing supply.
- **Offering homeless households private rented housing** using rent deposits and incentives to private landlords to do this and ensuring these properties are of good quality. Resettlement support is available for those moving outside Westminster. As for temporary accommodation, there are also policies in place to ensure those with the highest needs are prioritised for accommodation in Westminster and adjoining boroughs.
- **Commissioning nearly 2,000 units of supported housing** for a range of different groups that are not able to live independently.

Meeting the challenges ahead and having a homelessness system fit for the future



9.

Become a leader in the field of homelessness prevention, proposing solutions and bringing key decision makers together to share information and ideas.

We will do this by:

- **Using the learning from the Early Intervention Trailblazer Service to improve our services** and by sharing this with others and by **hosting workshops, inviting Government and other councils and organisations** to discuss best practice across London, so we can all learn from each other.
- **Reviewing this strategy and action plan after it has been implemented for one year and regularly after that**, when we have a better understanding of the impact of the Homelessness Reduction Act 2017. This will help to ensure both are still relevant and to understand if trends seen during 2018/19 (the growing number of single men approaching the Housing Solutions Service and an increase in Temporary Accommodation use for example) are continuing.

10.

Make the case for homelessness services and prevention work to be fully funded, by leading the discussion with Government and others on how the welfare system can work better for low income residents in central London, while also utilising every other funding source available to us.

We will do this by:

- **Highlighting problems with the existing benefits system and proposing solutions to Government where appropriate.** In relation to welfare benefits we recognise the need to protect the public purse. Local Housing Allowance levels for central London however need to be more reflective of actual rents, for example they could be calculated by taking the bottom third of rents, as is the case in other areas, but by also excluding 'super prime properties' from the calculation. Super prime properties are a unique characteristic of Westminster and they currently distort any calculation of rents. This in turn makes the scheme unworkable for Westminster.
- The Overall Benefit Cap for non-working households needs to be at least increased in line with inflation. It should also be more realistic for London, for example it could better reflect the median London household income from employment, which would take into account the unique circumstances in the capital where the cost of living is higher than elsewhere.
- Exemptions to the Overall Benefit Cap should also be reviewed. One group that could be excluded are those at risk of homelessness because of the cap, that are working with local authority services to find employment.
- With regards to Universal Credit, we support full data sharing between the Department of Work and Pensions and councils as the transfer takes place, so we can be in the best position to help those with support needs and to ensure they are not at risk of homelessness.
- Also, more flexibility for payments to be made direct to private landlords, when both the tenant and the landlord agrees to this, would help to ensure an ongoing supply of private rented properties for homeless households.

- **Cultivating a positive, constructive and wide-ranging conversation with the Treasury on how we finance local government and come up with a sustainable model.** We believe that the best way to fund local government is through fiscal devolution and we are seeking the ability to raise our own funds for critical work like preventing homelessness. Last year, we pioneered the Community Contribution to encourage Band H council taxpayers to contribute more voluntarily to their locality. Now we are willing to go a step further,

asking the Government to allow us to pilot new local levies related to service use and give us the ability to introduce additional council tax bands, using the revenue to invest in our communities and support our most vulnerable residents. We will continue to make the case for positive local measures to raise funding for our essential services.

- **Looking for all opportunities to fund homelessness services** including through working with businesses and our contractors.

Why?

Clearly preventing homelessness and addressing the risk factors that can lead to it at an early stage is better for those affected and less costly for councils and to achieve this we need to offer the most effective prevention services possible to meet the challenges ahead. The Homelessness Reduction Act 2017, implemented from April 2018, marks a step change in the way councils address homelessness, placing a much greater focus on prevention at an earlier stage and enabling a wider group of people to receive a service.

Although the longer-term impact of the Act is hard to predict, and will not be known for some time initial analysis shows:

- Homeless applications rose by over 140% during 2018/19 compared with 2017/18 and acceptances (where a full rehousing duty is owed) reduced.
- Temporary accommodation use has increased from 2,500 households in March 2018, to 2,700 in March 2019.
- The administrative costs are high.

Homelessness in Westminster and how we can respond to it is greatly affected by the national socio-economic context and policy set by the Government. We cannot tackle it alone. To effectively prevent homelessness in Westminster, we therefore need to cultivate an open and constructive dialogue with our colleagues in national Government to develop practical solutions to support our most vulnerable residents.

The costs of delivering homelessness services are high and providing temporary accommodation alone costs over £4m each year. There are significant challenges in procuring enough temporary accommodation which is affordable to the people living in it (i.e. within benefit levels) and to the council, i.e. within subsidy arrangements. A long term and stable funding solution is needed for temporary accommodation and for all homelessness services.

Benefit levels not meeting rent levels has played a part in increasing homelessness in Westminster, particularly as most of Westminster is affected by the Local Housing Allowance caps. As the table on the next page shows, the caps are significantly below even the cheapest rents for larger homes.

This situation results in the council having to generally go outside Westminster to find private rented housing which can lead to dissatisfaction amongst residents particularly those with strong local connections.

We recognise that the council can't always look to central Government alone for funding and that it is well placed to also look for funding for innovative homelessness projects. We can use our relationships with the business community to seek their support and incentivise them to invest in local homelessness projects where they are looking to invest in the local community. We can also seek a contribution for homelessness projects from companies we have contracts with.

	Shared	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Westminster rents per week (30th percentile)*	£160	£375	£540	£750	£975
Central London LHA rate (capped rates) per week	£144.84	£276.51	£320.74	£376.04	£422.42
Gap per week	£15.16	£98.49	£219.26	£373.96	£552.58
Westminster rents per year (30th percentile)	£8,320	£19,500	£28,080	£39,000	£50,700
Central London LHA rate (capped rates) per year	£7,531.68	£14,378.52	£16,640	£19,554.08	£21,965.84
Gap per year	£788.32	£5,121.48	£11,440	£19,445.92	£28,734.16
Overall benefit cap rates	Singles: £296.35 per week, £15,410 per year Couples/Lone parent households/Households with children: £442.31 per week, £23,000 per year				

*The 30th percentile is the bottom third of rents. Source: Hometrack data October 2019, with the exception of the shared rent, which is a lower quartile rent from Valuation Office Agency data. LHA rates are for March 2019.

Our Rough Sleeping Strategy 2017-2022

Why we have a dedicated Strategy

- Rough sleeping is the most visible and dangerous form of homelessness and requires a different type of response to other forms of homelessness.
- Westminster faces a unique set of challenges being in the heart of the Capital. Comparable only to other global cities such as New York, we see far more rough sleepers each year than any other local authority in the UK. On any one night there are approximately 380 people sleeping on our streets. These rough sleepers rarely have had any previous connection to Westminster, and instead have travelled here from other places across the UK or from around the world.
- Some rough sleepers have experienced trauma, addiction and acute mental health problems and need intensive wrap around support for many years. Some have accommodation available but find it difficult to move away from the streets for good and can return to sleeping rough. We also see non-UK nationals who are not able to access traditional support away from the street, and others who are exploited by organised criminal gang networks to engage in begging and temporarily live in tent encampments.
- Whatever the reason someone may find themselves sleeping on our streets, it is harmful and dangerous, and the longer they stay on the streets, the more harmful and dangerous it gets, both for the individual and the wider community.

Rough Sleeping Strategy 2017 – 2022

The full strategy can be found here: westminster.gov.uk/housing-strategies

The Strategy gives information about rough sleeping in Westminster and how we aim to address it. There are three priorities and an action plan setting out how these will be met.

The aim of the Rough Sleeping Strategy

- The focus of the strategy is to help stop individuals from finding themselves on the streets and intervening as early as possible to stop dangerous behavioural patterns developing. It is also to tackle rough sleeping in a sustainable way, so that it doesn't simply move problems around the city. We take this approach in order to protect both individual rough sleepers and Westminster's resident and business communities from harm.

The priorities

- The priorities broadly follow the chronological journey experienced by individuals who find themselves at risk of, or who are sleeping rough:

Priority A: Where it is possible for us to do so, prevent people from rough sleeping in the first place.

This priority reflects the fact that the best approach to rough sleeping is a preventative one. Actions from the Strategy include:

- Ongoing collaboration with the Mayor and the Ministry of Housing, Communities and Local Government to develop prevention plans.
- Strengthening partnerships with probation services to ensure that people leaving prison do not end up on the streets.
- Creating partnerships between the council and Central London Clinical Commissioning Group to enable hostels to provide respite accommodation for rough sleepers.

Priority B: When people do end up on the streets, provide a rapid response, support people to rebuild their lives and stay off the streets for good.

This priority recognises that the council will not be able to prevent rough sleeping in all cases, and that for those who do end up sleeping on the streets, it is committed to the Mayor's aim that people who arrive new to London's streets don't spend a second night out. This priority also focuses on providing rough sleepers with a sustainable route away from the street, with each support plan tailored to their circumstances. This means working closely with partner agencies to address the complex challenges faced by rough sleepers.

Actions from the strategy include:

- Opening a new in-borough Assessment Centre, to work with rough sleepers who have no local connection to Westminster.
- Embedding a Mental Health professional as part of the regular outreach service, to provide help and support as well as a link with statutory mental health services.
- Developing a Housing First model, which focuses on providing rough sleepers with accommodation in the first instance, as a base from which more complex support needs can be assessed and met.

Priority C: Protecting communities from anti-social behaviour associated with rough sleeping and intervening to stop dangerous behaviour.

This priority focuses on people who have refused to engage with support services and who are posing a danger to themselves or others through anti-social behaviour or crime. The council works in partnership with the Metropolitan Police to tackle on-street crime and anti-social behaviour and aims to use enforcement activity as a tool to encourage rough sleepers to take positive steps towards moving off the streets.

Actions which help to meet this priority include creating the Integrated Street Engagement Unit, which offers comprehensive support for Westminster's daytime street population.

How we monitor our progress against the strategy

- The strategy is reviewed regularly and the progress is reported to the Cabinet Member responsible for rough sleeping.
- The last report was for 2017-18 and it highlights a number of successes against the commitments of the strategy as well as ongoing challenges.

Services for rough sleepers in Westminster include:

- **Over 30 outreach workers** to support and manage the rough sleeping population. Their work includes bringing rough sleepers to the No Second Night Out Assessment Hub where they are assisted to come off the streets.
- **A rapid response service** to stop rough sleepers spending a second night on the streets.
- **415 supported bed spaces** and an assessment centre which can sleep up to 40 people.
- **An emergency shelter** to accommodate up to 250 people when temperatures are expected to fall below zero.
- **20 units of accommodation with support** for rough sleepers that are ready to live independently.
- **Street buddies** that befriend rough sleepers and encourage them to take up services.

Glossary

Affordable housing

Housing for people that cannot afford market homes. There are two broad types:

- **Social housing:** This is rented housing for people with low incomes and are on the council's Housing Waiting List. Some examples of rent levels are:

Bedroom sizes	Average council rents per week	London Affordable Rent per week
Studio	£97	£155
1	£113	£155
2	£126	£164
3	£140	£173
4	£153	£182
5	£165	£192
>5	£171	£201

(London Affordable Rent is the maximum rent supported by the Mayor for 2019/20 for new homes)

- **Intermediate housing:** This is for people that aren't eligible for social housing, but can't afford market homes. It can either be rented housing or low cost home ownership like shared ownership. There is also a Waiting list.

Some examples of intermediate rent levels are below:

Bedroom sizes	London Living Rent per week
1	£263
2	£293
3	£322

(These London Living Rents are the average intermediate rent levels supported by the Mayor for Westminster for 2019/20).

Children's Services

The department of the council which is responsible for the welfare of children and young people. A range of services are provided.

City Plan

This sets out the council's policies which will determine planning applications. Westminster's draft City Plan 2019 – 2040 is currently being consulted on

Disabled Facilities Grant

Grants provided by the council to enable people with a disability to make necessary changes to their home.

Discretionary Housing Payment

Payments which can make up the difference, or some of the difference, between Local Housing Allowance or the housing element of Universal Credit and rents. Applications are assessed in line with the council's policy.

Discretionary Licensing Scheme

Only certain Houses in Multiple Occupation come under the mandatory licensing scheme, (set by Government) but councils can introduce their own scheme, for a wider range of properties, if certain criteria are met. A licensing scheme means the property has to meet the council's standards and other criteria.

Domestic Abuse Housing Alliance

This is a partnership between the charity Standing Together Against Domestic Abuse and two housing associations. It provides an accreditation process for housing providers, which are assessed as providing exceptional support to victims of domestic abuse as part of their regular work.

Environmental Health

Team within the council which responds to complaints of poor conditions in the private rented sector.

Family Hubs

Family Hubs provide a range of services for families in one place such as school nurses, health visitors, social workers and parental support programmes.

Fitness for Human Habitation Act 2018

Legislation which came into force in March 2019, enabling tenants to take action against their landlords if their homes are not fit to be lived in.

Fixed term tenancies

The Localism Act 2011 enables councils to offer fixed term (or flexible) council tenancies instead of ones for life. Most new council tenancies in Westminster are fixed term, generally for five years.

Homelessness Reduction Act 2017

Implemented from April 2018, the Act has significantly changed the way in which homelessness is dealt with. There is a requirement on local authorities to help anyone eligible threatened with homelessness within the next 56 days, as well as a duty to help relieve homelessness, if it can't be prevented.

Housing Associations

See Registered Providers.

Housing Solutions Service

The council's frontline homelessness service which provides support for residents who need housing advice or are threatened with homelessness.

Infill sites

These are small sites on existing council estates where there are opportunities to build new affordable homes.

Intermediate housing

See Affordable Housing above.

Local Housing Allowance (LHA)

Housing Benefit is paid when someone doesn't have enough income to pay their rent. The amount of Housing Benefit received not only depends on individual circumstances, but also on the LHA level for the local area. Generally these LHA levels reflect the 30th percentile of local private rented sector rates, up to an overall cap.

Making Every Adult Matter (MEAM)

This is a coalition of charities which aim to improve services to people facing multiple disadvantages (such as homelessness, substance misuse, or ill health). MEAM works with local authorities and others

to help them bring everyone together to develop a consistent approach to residents with multiple disadvantages.

Making Every Contact Count

Way of working where the right questions are asked so people get the right help and support quickly

Market housing

Housing that is for rent or for sale in the private sector at the full market value and is not discounted in any way.

Mystery Shopping

This is where the quality of a service is investigated without the organisation knowing and feedback is then reported back to them.

No fault evictions

These are where a landlord evicts a tenant at short (two months) notice and without a reason (also known as Section 21 evictions). They can sometimes be in response to the tenant complaining. Government has consulted on abolishing Section 21.

Personal Housing Plans

These are a requirement of the Homelessness Reduction Act 2017 and they require the local authority to develop a plan with the person who is homeless or threatened with homelessness, setting out the actions the person and the council will take to help prevent them from becoming homeless or to help them secure accommodation.

Reducing Parental Conflict Programme

A Department for Work and Pensions led programme, aimed at providing better support for families at risk of parental conflict. The council has received funding to participate in the programme.

Registered Providers

Not for profit or charitable organisations that, along with local authorities, also provide Affordable Housing (see above). They are also known as Housing Associations.

Social housing

See Affordable Housing above.

Social Impact Bond

A contract where social investors pay for a project and then achieve payments by results.

Temporary Accommodation

Accommodation provided by the council for homeless households they have a rehousing duty towards. It is generally private rented housing.

Trauma Informed Working

Having an understanding of the difficulties someone may have experienced and how this could lead to them being more at risk of homelessness and may affect their behaviour

Universal Credit (UC)

UC is generally paid directly to the customer and it replaces a range of benefits, such as Jobseeker's Allowance, Housing Benefit and Working Tax Credits. It is being introduced in stages across the UK.

Welfare reform

This is a general term to describe a range of changes which were made to the benefit system and were introduced through the Welfare Reform Act 2012. The changes include Local Housing Allowance caps and an Overall Benefit Cap for non working households.

Westminster Advice Services Partnership (WASP)

WASP is commissioned by the council to provide free and independent advice to Westminster residents on a range of issues including housing, employment, finances and immigration.

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Westminster City Council Homelessness Strategy 2019 – 24 Action Plan

Year 1: Until – March 2020, Year 2: April 2020 – March 2021, Year 3: April 2021 – March 22, Year 4: April 2022 – March 2023, Year 5: April 2023 – March 24

	<i>Action</i>	<i>Further detail</i>	<i>Year</i>	<i>By</i>	<i>Owner</i>	<i>Others involved</i>
1. Reach more people at risk of homelessness at an earlier stage, by building a network of prevention and support, working with partners and communities						
1.1	Co-produce a 'Homelessness Prevention Charter'	Complete Charter	Year 3	Spring 2021	Homelessness Partnership Board	Range of stakeholders
1.2	Implement a rolling programme of training and awareness raising	Community lead to build up contacts and identify opportunities	Year 2	Summer 2020	WCC Early Intervention Trailblazer Service	Range of stakeholders, i.e. community, faith and voluntary groups and registered providers
		Develop training plan	Year 2	Autumn 2020	As above	
		Start training and set annual training targets	Year 3 & Ongoing	Ongoing	WCC Housing Team/Housing Solutions Service	
1.3	Recruit Community Champions and train them to offer support and information to residents	Investigate funding opportunities and expanding the council's health focused Community Champions Scheme	Year 1	Spring 2020	WCC Early Intervention Trailblazer Service/Public Health	Community Champions currently in post
1.4	Continue to develop referral routes to housing services, for those working with people at risk of homelessness	Investigate providing Housing advice from GP surgeries	Year 1	Winter 2019	Housing Solutions Service (Shelter)	Public Health
		Review all referral routes	Year 3	Spring 2021	WCC Housing Team	Range of stakeholders

	Action	Further detail	Year	By	Owner	Others involved
2. Make our services more visible through targeted information campaigns						
2.1	Use a range of channels of communication to increase the visibility of our services	Start poster and leaflet campaign	Year 1	Spring 2020	WCC Communications and Engagement Team	Housing Solutions Service
		Improve housing information on the website	Year 2	Summer 2020	WCC Housing Team/Communications and Engagement Team	
		Publicise success stories	Ongoing	Ongoing	Communications and Engagement Team	
3. Proactively offer personalised support to those at risk of homelessness where possible, from helping them negotiate with their landlord to offering employment and skills training so they can increase their income						
3.1	Use data to introduce new ways of flagging those at risk of homelessness	Pilot approach using Council Tax data	Year 1	Spring 2020	WCC Early Intervention Trailblazer Service	WCC Strategy & Intelligence Team
		Evaluate results of Pilot	Year 2	Autumn 2020	As above	
3.2	Look for ways to continue and grow the early intervention approach	Review how the learning from the Trailblazer Early Intervention Service can be embedded into service provision	Year 3	Spring 2021	WCC Housing Team	Housing Solutions Service
4. Do more to identify and address the main causes of homelessness in Westminster and also the wider causes, through research and outreach						
4.1	Address homelessness from the social sector: <ul style="list-style-type: none"> Research overcrowded families living in our council housing, to better understand them and their needs 	Run estate based pilot and consider the results before rolling out more widely	Year 2	Winter 2020	WCC Early Intervention Trailblazer Service	Overcrowded families/ Strategy and Intelligence Team

	Action	Further detail	Year	By	Owner	Others involved
4.3	<p>Address homelessness due to relationship breakdown</p> <ul style="list-style-type: none"> Understand if there is role for the council 	<ul style="list-style-type: none"> Training for housing staff on Reducing Parental Conflict Complete or commission research 	Year 1	Winter 2019/20	WCC Children's Services	Housing Solutions Service/Early Intervention Trailblazer Service
			Year 2	Autumn 2020	WCC Housing Team	WCC Strategy and Intelligence Team/WCC Children's Services
4.4	<p>Address the wider causes of homelessness</p> <ul style="list-style-type: none"> Pilot with MyBnk, providing training to 18-25 year olds, at risk of homelessness Run awareness sessions about preventing homelessness in schools and youth centres Look at ways to better support residents to manage their finances and raise their incomes 	Complete Pilot	Year 3	Winter 2021	WCC Early Intervention Trailblazer Service/ WCC Housing Team	MyBnk/Young people at risk Children's Services/ WCC Strategy & Intelligence Team
		Evaluate pilot and make recommendations	Year 4	Spring 2022		
		Start sessions	Year 2 & Ongoing	Autumn 2020	Housing Solutions Service (Shelter)	Westminster Youth Council/WCC Children's Services
		Pilot any new approaches on one or two estates	Year 2	Summer 2020	WCC Economy and & Regeneration Team/WCC Housing Team	WCC Policy and projects
	Seek resources for a service for people with low level mental health problems	Ongoing	Ongoing	WCC Housing Team	WCC Public Health/Mental Health Partnership	

	Action	Further detail	Year	By	Owner	Others involved
	<ul style="list-style-type: none"> Ensure awareness of employment support 	Let social landlords know about employment support for tenants and ensure employment coaches can identify and refer those at risk of homelessness	Year 1	Ongoing	WCC Housing Team/Economy Team	Westminster Housing Association Chief Executives Forum
	<ul style="list-style-type: none"> Review Personal Housing Plans 	Ensure they address the wider causes of homelessness, where appropriate	Year 1	Spring 2020	WCC Housing Team/Housing Solutions Service	WCC Children’s Services/Adult Social Care and Public Health/ Welfare Reform Group
	<ul style="list-style-type: none"> Support vulnerable households moving onto Universal Credit 	Work with DWP to understand their timetable and package of support and ensure everyone across the council is aware of it	To coincide with rollout	To coincide with rollout	WCC Policy and Projects Team/Benefits Policy Team	
5. Make our housing services more transparent, accountable and accessible						
5.1	Set up a Homelessness Partnership Board	Establish Board	Year 2 and Ongoing	Summer 2020 & Ongoing	WCC Early Intervention Trailblazer Service	Range of stakeholders including homeless households
5.2	Improve our homelessness service by seeking the views of service users and stakeholders	Establish Service Improvement Group and run quarterly meetings	Year 1	Summer 2019 & Ongoing	WCC Housing Team/Housing Solutions Service	Service users/ Other boroughs
		Develop service user ‘Expert Panel’ to be the point of contact for key changes	Year 2	Summer 2020	As above	Service users

	<i>Action</i>	<i>Further detail</i>	<i>Year</i>	<i>By</i>	<i>Owner</i>	<i>Others involved</i>
		<i>Commission agency to conduct Mystery Shopping and seek opportunities for cross borough working</i>	<i>Year 1</i>	<i>Spring 2020</i>	<i>Housing Solutions Service (Shelter)</i>	
		<i>Incorporate exit interviews</i>	<i>Year 3</i>	<i>Winter 2023</i>	<i>WCC Housing Team/Housing Solutions Service</i>	<i>Service users</i>
5.3	<p><i>Become more person centred by:</i></p> <ul style="list-style-type: none"> <i>Becoming Accredited by the Domestic Abuse Housing Alliance</i> <i>Applying the learning from the Making Every Adult Matter pilot and rolling it out</i> <i>Train front line housing staff on trauma informed working</i> <i>Train front line housing staff on</i> 	<p><i>Accreditation achieved</i></p> <p><i>Complete Pilot Evaluate learning</i></p> <p><i>Complete training</i></p> <p><i>Complete training</i></p>	<p><i>Year 2</i></p> <p><i>Year 2</i></p> <p><i>Year 2</i></p> <p><i>Year 2</i></p>	<p><i>Summer 2020</i></p> <p><i>Winter 2021</i></p> <p><i>Spring 2020</i></p> <p><i>Spring 2020</i></p>	<p><i>Housing Solutions Service</i></p> <p><i>WCC Children’s Services/Housing Team</i></p> <p><i>WCC Housing Team/Housing Solutions Service</i></p> <p><i>WCC Housing Team/Housing Solutions Service</i></p>	<p><i>Domestic Abuse Housing Alliance</i></p> <p><i>Housing Solutions Service</i></p> <p><i>WCC Public Health</i></p> <p><i>WCC Public Health</i></p>

	<i>Action</i>	<i>Further detail</i>	<i>Year</i>	<i>By</i>	<i>Owner</i>	<i>Others involved</i>
	<p><i>Making Every Contact Count</i></p> <ul style="list-style-type: none"> <i>Look at ways to improve our response when households have mental health problems</i> 	<p><i>Raise awareness of OneYou website which gives information about services</i></p> <p><i>Investigate Mental Health First Aid training for housing staff</i></p>	<p><i>Year 1</i></p> <p><i>Year 1</i></p>	<p><i>Autumn 2019</i></p> <p><i>Winter 2019</i></p>	<p><i>As above</i></p> <p><i>WCC Housing Team/Housing Solutions Service</i></p>	<p><i>As above</i></p> <p><i>WCC Mental Health Partnership/ WCC Public Health</i></p>
5.4	<i>Improve digital access to the Housing Solutions Service</i>	<i>Complete review of current service and involve service users</i>	<i>Year 2</i>	<i>Summer 2020</i>	<i>WCC Housing Team</i>	<i>Housing Solutions Service/ Customer and Digital Standards Board/service users</i>
6. Better communicate what we can and can't offer						
6.1	<i>Communications campaign about our services and what people can expect from them</i>	<p><i>Develop a Communications Plan, test with service users</i></p> <p><i>Roll out to start</i></p>	<p><i>Year 1</i></p> <p><i>Year 2 and Ongoing</i></p>	<p><i>Winter 2019/20</i></p> <p><i>Spring 2020</i></p>	<i>WCC Communications and Engagement Team</i>	<i>WCC Housing Team/ Housing Solutions Service</i>
7. Ensure a range of accommodation is available for the homeless households that we have a housing duty towards, when homelessness cannot be prevented						
7.1	<i>Set new affordable housing target when needed and ensure intermediate housing is affordable to a range of households</i>	<p><i>Review past delivery and set new target (current target expires in 2023)</i></p> <p><i>Set affordability thresholds in the Supplementary Planning</i></p>	<p><i>Years 4 & 5</i></p> <p><i>Year 2</i></p>	<p><i>Spring 2023</i></p> <p><i>Winter 2020</i></p>	<p><i>WCC Development Team</i></p> <p><i>WCC Policy and Projects Team</i></p>	<p><i>Registered providers</i></p> <p><i>WCC Housing Team</i></p>

	<i>Action</i>	<i>Further detail</i>	<i>Year</i>	<i>By</i>	<i>Owner</i>	<i>Others involved</i>
	<i>Review the Allocation Scheme</i>	<i>Document for the City Plan 2019 – 40</i> <i>Consider support to under occupiers and how the scheme works for all households in need</i>	<i>Year 1</i>	<i>To start Winter 2019/20</i>	<i>WCC Policy and Projects Team</i>	<i>WCC Housing Team/Housing Solutions Service/Children’s and Adult Services</i>
7.2	<i>Ensure sufficient private rented housing for homeless households and look for innovative ways to increase supply</i>	<i>Update annual Action Plan</i> <i>Develop Temporary Accommodation Reduction Plan, firstly piloting new initiatives</i>	<i>Year 2</i>	<i>Spring 2020</i>	<i>WCC Housing Team</i>	<i>Housing Solutions Service</i>
			<i>Year 2</i>	<i>Summer 2020</i>	<i>WCC Housing Team</i>	<i>Housing Solutions Service</i>
7.3	<i>Increase settled private rented accommodation</i>	<i>Review targets as part of Homelessness Delivery Plan</i>	<i>Year 1</i>	<i>March 2020</i>	<i>Housing Solutions Service</i>	<i>Housing Solutions Service</i>
	<i>Explain why these private rented sector offers are generally outside of Westminster</i>	<i>Part of campaign in 6.1</i>	<i>Year 2 and ongoing</i>	<i>Spring 2020</i>	<i>WCC Communications and Engagement Team</i>	<i>WCC Housing Team/Housing Solutions Service</i>
	<i>Look at ways to give customers more choice over the location of these offers</i>	<i>Work with temporary accommodation households to understand their needs</i>	<i>Year 2</i>	<i>Spring 2021</i>	<i>Housing Solutions Service (RMG)</i>	<i>WCC Housing Team</i>
		<i>Establish website to market available properties</i>	<i>Year 1</i>	<i>December 2019</i>	<i>Housing Solutions Service (RMG)</i>	

	<i>Action</i>	<i>Further detail</i>	<i>Year</i>	<i>By</i>	<i>Owner</i>	<i>Others involved</i>
		<i>Investigate recruiting Community Connectors to help people settle, using a 'peer mentoring model' with households that have successfully moved to other areas</i>	<i>Year 2</i>	<i>Spring 2020</i>	<i>Housing Solutions Service (Shelter)</i>	<i>WCC Housing Team/ former homeless households</i>
8. Review how people access supported housing and ensure our supported housing meets needs, now, and in the future						
<i>8.1</i>	<i>Develop an on line referral system</i>	<i>Procure system</i>	<i>Year 1</i>	<i>Winter 2019</i>	<i>WCC Housing Team</i>	<i>WCC IT Team</i>
		<i>New system goes live</i>	<i>Year 2</i>	<i>Spring 2020</i>		
<i>8.2</i>	<i>Work with specialist providers to ensure dedicated support for survivors of domestic abuse</i>	<i>Re-procure refuges</i>	<i>Year 1</i>	<i>Winter 2019</i>	<i>WCC Housing Team</i>	<i>Refuge</i>
<i>8.3</i>	<i>Review the needs of young people to ensure suitable accommodation for different needs</i>	<i>Complete needs analysis and re-procure services where appropriate</i>	<i>Years 1 – 2</i>	<i>Spring 2020 - 21</i>	<i>WCC Housing Team</i>	<i>WCC Children's Services/ Young adults/homelessness sector</i>
		<i>New services to begin</i>	<i>Year 3</i>	<i>Spring 2021</i>		
<i>8.4</i>	<i>Review sheltered housing commissioned from registered providers</i>	<i>Complete review</i>	<i>Year 2</i>	<i>Spring 2020</i>	<i>WCC Housing Team</i>	<i>Registered providers/ WCC Adult Social Care</i>
<i>8.5</i>	<i>Re-procure offender services, considering how we can better meet the needs of young offenders and reduce reoffending</i>	<i>Complete re-procurement and new contract to start Contract start</i>	<i>Year 2</i>	<i>Summer 2020</i>	<i>WCC Housing Team</i>	<i>Housing Solutions Service Homelessness sector</i>

	<i>Action</i>	<i>Further detail</i>	<i>Year</i>	<i>By</i>	<i>Owner</i>	<i>Others involved</i>
9. Become a leader in the field of homelessness prevention proposing solutions and bringing key decision makers together to share information and ideas						
9.1	<i>Share the learning from the Early Intervention Trailblazer Service with Government, other councils etc and encourage them to share best practice with us</i>	<i>Hold workshop</i>	<i>Year 2</i>	<i>Autumn 2020</i>	<i>WCC Early Intervention Trailblazer Service</i>	<i>London boroughs Groups working with homeless households</i>
9.2	<i>Review the Homelessness Strategy and Action Plan to ensure they are up to date and still relevant</i>	<i>After one year of implementation</i>	<i>Year 2</i>	<i>Spring 2021</i>	<i>WCC Policy and Projects Team/Housing Team</i>	
10. Make the case for homelessness services and prevention work to be fully funded, by leading the discussion with Government and others on how the welfare system can work better for low income residents in central London, while also utilising every other funding source available to us						
10.1	<i>Highlight problems with the existing benefits system and proposing solutions to Government where appropriate</i>	<i>Use a range of methods such as consultation responses, briefings for Ministers and letters</i>	<i>Year 1 & Ongoing</i>	<i>Autumn 2019 & Ongoing</i>	<i>WCC Policy and Projects Team</i>	<i>Lead members WCC Welfare Reform Group</i>
10.2	<i>Cultivate a positive, constructive and wide-ranging conversation with the Treasury on how we finance local government and come up with a sustainable model</i>	<i>As above</i>	<i>Year 1 & Ongoing</i>	<i>Autumn 2019 & Ongoing</i>	<i>WCC Policy and Projects Team</i>	<i>Lead members</i>

APPENDIX C

	<i>Action</i>	<i>Further detail</i>	<i>Year</i>	<i>By</i>	<i>Owner</i>	<i>Others involved</i>
10.3	<i>Look for all opportunities to seek external funding for homelessness projects</i>	<i>Utilise all opportunities</i>	<i>Ongoing</i>	<i>Ongoing</i>	<i>WCC Housing/Economy and Regeneration Teams</i>	<i>WCC Policy and Projects Team</i>

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EQUALITY IMPACT ASSESSMENT TEMPLATE

PLEASE ENSURE YOU READ THE GUIDANCE NOTES BEFORE COMPLETING THIS TEMPLATE

Completing an EIA is the simplest way to demonstrate that the Council has considered the equality impacts of its decisions and it reduces the risk of legal challenge. EIAs should be carried out at the earliest stages of policy development or a service review, and then updated as the policy or review develops. EIAs must be undertaken when it is possible for the findings to inform the final decision.

SECTION 1:

<p>Title</p>	<p>Homelessness Strategy 2019-2024</p>
<p>What are you analysing?</p> <ul style="list-style-type: none"> • What is the policy/project/activity/strategy looking to achieve? • Who is it intended to benefit? Are any specific groups targeted by this decision? • What results are intended? 	<p>Background</p> <p>Following legislative changes, the formulation of a homelessness strategy is a statutory requirement for all councils.</p> <p>The key areas which need to be covered within a Homelessness Strategy are:</p> <ul style="list-style-type: none"> • How the council will prevent their homelessness • How the council will ensure that sufficient accommodation is and will be available for people in the local borough who are or may become homeless • How the council will secure the satisfactory provision of support for people in the local borough who are or may become homeless or who have been homeless and need support to prevent them becoming homeless again <p>Before writing a Homelessness Strategy, local authorities are required to complete a review of homelessness in the local area. Officers compiled a Review of Homelessness for Westminster in early 2019 which sets out the current situation in terms of:</p> <ul style="list-style-type: none"> • The levels of homelessness locally • Who is most affected by homelessness • What actions are being taken currently to prevent homelessness • The legislative and policy framework • The future homelessness challenges ahead

Following this, the Review was used to formulate the Homelessness Strategy for Westminster.

What this Equality Impact Assessment (EIA) is evaluating

This EIA evaluates the council's Homelessness Strategy. The overall five-year aim of the Strategy is to prevent homelessness in the borough at an earlier stage, and to encourage a more open and collaborative working relationship between the council's frontline housing services and stakeholders, including residents and the voluntary and community sector.

Homelessness can take many forms, which include:

- **Rough sleeping:** this is the most visible form of homelessness and includes people bedding down on the streets or sleeping on public transport etc.
- **Statutory homelessness:** this is where people or households have approached the local authority as they are either threatened with homelessness or are actually homeless.

This EIA doesn't analyse the council's approach to rough sleeping as Westminster already has a Rough Sleeping Strategy 2017 – 22, which is being implemented, and was subject to a separate EIA which can be found at:

https://www.westminster.gov.uk/sites/default/files/rough_sleeping_strategy_equality_impact_assessment_003.pdf

The Homelessness Review and Strategy summarise the approach to rough sleeping set out in the Rough Sleeping Strategy.

Key features of the Homelessness Strategy

The Homelessness Strategy sets out a ten-point plan for achieving its overall aims, which are set out below:

Preventing People from becoming homeless in the first place

1. To reach more people at risk of homelessness at an earlier stage
2. To make the council's services more visible through information campaigns
3. To proactively offer personalised support to those at risk of homelessness where possible
4. To do more to identify the main causes of homelessness in Westminster

	<p>Improving our services and response when people become homeless:</p> <ol style="list-style-type: none"> 5. To make our housing services more transparent, accountable and accessible 6. To better communicate what we can and can't offer 7. To ensure a range of accommodation is available when needed 8. To review access to supported housing now and for the future <p>Meeting the challenges ahead and having a homelessness system fit for the future</p> <ol style="list-style-type: none"> 9. To become a leader in the field of homelessness prevention by proposing solutions and bringing decision-makers together 10. Make the case for homelessness services and prevention work to be fully funded, by leading the discussion with Government and others on how the welfare system can work better for low income residents in central London, while also utilising every other funding source available to us <p>The ten-point plan aims to have an overall positive impact on anyone in Westminster who might be at risk of homelessness, by empowering them to take earlier action to prevent a housing crisis from occurring through raising awareness of services and by working differently with the community and other stakeholders so they also have a role in homelessness prevention. The council also aims to do more to understand and address the top causes of homelessness in Westminster, including factors such as family breakdown. It also aims to address the wider causes such as debt and low-level mental health issues.</p> <p>For those residents who do have to approach the council for help, the proposals aim to have an overall positive impact by making the council's frontline services easier to navigate and more accountable. Where the council makes a private rented offer, the aim is to do more to explain why these often cannot be in Westminster, due to the high cost of rents in the city and to offer help for people to settle into new communities outside of the borough where necessary.</p> <p>Certain groups and people are more likely to be impacted by homelessness as set out in Section 2.</p>
	<p>(i) Full Name: Isobel Caton Harrison</p> <p>(ii) Position: Policy Officer</p> <p>(iii) Unit: Policy, Performance and Communications</p>

APPENDIX D

	(iii) Contact Details: icharrison@westminster.gov.uk
Date sent to Equalities@westminster.gov.uk	
Version number and date of update	1
<p><i>You will need to update your EIA as you move through the decision-making process. Record the version number here and the date you updated the EIA. Keep all versions so you have evidence that you have considered equality throughout the process. However <u>only</u> the most updated version will be saved in the Equalities SharePoint folder.</i></p>	

SECTION 2: Do you need to complete a full Equality Impact Assessment (EIA)?

Not all proposals will require a full EIA, the assessment of impacts should be proportionate to the nature of the project/policy in question and its likely impact. To decide on the level of detail of the assessment required consider the potential impact on persons with protected characteristics.

2.1	Please provide an overview of who uses/will use your service or facility and identify who are likely to be impacted by the proposal <ul style="list-style-type: none"> • <i>If you do not formally collect data about a particular group then use the results of local surveys or consultations, census data, national trends or anecdotal evidence (indicate where this is the case). Please attempt to complete all boxes.</i> • <i>Consider whether there is a need to consult stakeholders and the public, including members of protected groups, in order to gather information on potential impacts of the proposal</i>
<p>How many people use the service currently? What is this as a % of Westminster's population?</p>	<p>Nearly 5,000 households contacted the council's Housing Solutions Service during 2018/19, which is nearly 4% of all Westminster households. Before the Homelessness Reduction Act 2017 (HRAAct), which came into effect from April 2018, the council received around 1,000 homeless applications each year, which is less than 1% of all households. The HRAAct 2017 significantly changed the way in which homelessness is dealt with, so it is difficult to compare historic levels and trends with current ones.</p> <p>Overall, those approaching the Housing Solutions Service are more likely to be living in the more deprived areas of Westminster. Homeless households in temporary accommodation are more likely to be, compared to their share of the Westminster population, from a Black, Arab, Other and Asian ethnic background, women and lone parents. Homeless applicants are more likely to have low incomes and receive benefits, although they are not necessarily unemployed (around 50% of households in temporary accommodation are working).</p> <p>Analysis of those applying as homeless since the HRAAct 2017 indicates a changing customer base when compared to those in temporary accommodation. During 2018/19 more single people made homeless applications (56%) than families (44%) and 60% of applications made by single people were from men. Black, Arab and Asian households were over represented amongst homeless</p>

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	<p>applicants in 2018/19 and White households were under represented, compared to their population share, although less so than when compared with the temporary accommodation population.</p> <p>The data below shows the number of homeless households (both households in temporary accommodation and households approaching the council for support) falling within each of the protected characteristics, compared to the overall borough figures. The Strategy aims to reach not only residents who are already approaching the council for help, but also those who at risk of homelessness who are not yet known to council services. Therefore the Strategy could potentially impact on any residents in the city.</p> <p>However, the Strategy is most likely to impact on homeless households approaching its services and households in temporary accommodation, and these are also the groups for which council has gathered specific data. These are therefore the groups which are the focus of the analysis below, but it should be noted that the long-term impact of the Strategy has the potential to go beyond these groups.</p>												
Gender	<p>Table 1: Homeless households by gender, compared to the Westminster population</p> <table border="1" data-bbox="354 875 1121 1272"> <thead> <tr> <th></th> <th>Homeless Households in temporary accommodation (lead applicant)</th> <th>Homeless Households (Applicants) 2018/19 (lead applicant)</th> <th>Westminster Population (2017 ONS Mid-year estimates)</th> </tr> </thead> <tbody> <tr> <td>Women</td> <td>71%</td> <td>48%</td> <td>48%</td> </tr> <tr> <td>Men</td> <td>29%</td> <td>52%</td> <td>52%</td> </tr> </tbody> </table> <p>The balance of men and women applying as homeless during 2018/19 was comparable to their respective share in the Westminster population. Notably 52% of applications were from men, which compares to 29% of men living in temporary accommodation.</p>		Homeless Households in temporary accommodation (lead applicant)	Homeless Households (Applicants) 2018/19 (lead applicant)	Westminster Population (2017 ONS Mid-year estimates)	Women	71%	48%	48%	Men	29%	52%	52%
	Homeless Households in temporary accommodation (lead applicant)	Homeless Households (Applicants) 2018/19 (lead applicant)	Westminster Population (2017 ONS Mid-year estimates)										
Women	71%	48%	48%										
Men	29%	52%	52%										
Disability	<p>Physical Disability</p> <p>Looking at physical health, less than 6% of homeless households living in temporary accommodation in Westminster have members with a physical disability. While city wide data is not directly comparable with the categories below, it identifies that 9% of the working age Westminster population is estimated to have a serious or moderate physical disability¹.</p>												

¹ PANSI information 2015

Table 2: Households in temporary accommodation with a need for different property types

	Fully wheelchair accessible property needed	Property needed for those who use a wheelchair outside the home but can manage in the home without one	Level access property needed with no stairs	Non adapted property needed
Homeless households in temporary accommodation	<1%	<1%	4%	95%

Analysis of those applying as homeless during 2018/19 (see table 12) shows greater proportions have a physical illness or disability (15%) which is more in line with the overall Westminster population. (Note: households are only categorised for the different types of properties in table 2 once they are accepted as homeless).

Physical and Mental Health Issues

Table 3: Homeless Applicants with physical and mental health issues and support needs

2018-19	%
History of mental illness	9%
Physical ill health or disability	15%
At risk or experienced domestic abuse	8%
Offending history	3%
Other support needs	4%

Nine per cent of applicants during 2018/19 had (or had a household member with) a mental health issue. It is likely, however, that other applicants and members of their households may have mental health problems. A national survey conducted by Shelter of 2,000 people in temporary accommodation², found that more than half said that they were suffering from depression and other mental health problems. Across Westminster, an estimated 16% of the working age population may have a common mental health issue³.

The consultation on the Homelessness Strategy identified that low to moderate mental health issues were a common issue amongst Westminster residents who are most at risk of homelessness. As a

² http://england.shelter.org.uk/_data/assets/pdf_file/0012/40116/Living_in_Limbo.pdf

³ PANSI information 2015

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	<p>result of this, the Strategy was adapted to include more actions around signposting housing applicants to resources to help them manage their mental health.</p>																								
Sexual orientation	<p>Table 4: Sexual orientation of homeless applicants 2018/19</p> <table border="1"> <thead> <tr> <th>Sexual orientation</th> <th>%</th> </tr> </thead> <tbody> <tr> <td>Gay / Lesbian</td> <td>1%</td> </tr> <tr> <td>Heterosexual</td> <td>46%</td> </tr> <tr> <td>Unknown/Prefer not to say</td> <td>53%</td> </tr> </tbody> </table> <p>The sexual orientation of residents in temporary accommodation is not available.</p> <p>The Office of National Statistics estimate the Lesbian, Gay and Bisexual population of London to be 2.2-3%, while this is higher than the proportion of Gay/Lesbian people applying as homeless, it is not possible to make comparisons given the sexual orientation of 53% of applicants is unknown.</p>	Sexual orientation	%	Gay / Lesbian	1%	Heterosexual	46%	Unknown/Prefer not to say	53%																
Sexual orientation	%																								
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Gender Reassignment	<p>Data on gender reassignment is not currently gathered from either households currently in temporary accommodation or households presenting as homeless.</p>																								
Race	<p>The groups most affected by homelessness during 2018/19, compared to their population share were:</p> <ul style="list-style-type: none"> • Black African • Black Caribbean • Arab • Other ethnic background (including Chinese). <p>The table below shows this in more detail.</p> <p>Table 5: Homeless applicants by ethnicity</p> <table border="1"> <thead> <tr> <th>Ethnicity</th> <th>Homeless Households (Applicants) 2018/19* (lead applicants)</th> <th>Westminster Population (GLA Ethnic Projections for 2018 – persons)</th> </tr> </thead> <tbody> <tr> <td>White: English/Welsh/Scottish/Northern Irish/British</td> <td>19.7%</td> <td>31%</td> </tr> <tr> <td>White: Gypsy or Irish Traveller</td> <td>0.08%</td> <td>-</td> </tr> <tr> <td>White: Irish</td> <td>1.1%</td> <td>-</td> </tr> <tr> <td>Any other White background</td> <td>8.4%</td> <td>29%</td> </tr> <tr> <td>Black: African</td> <td>16.6%</td> <td>4%</td> </tr> <tr> <td>Black: Caribbean</td> <td>6.8%</td> <td>2%</td> </tr> <tr> <td>Any other Black/African/Caribbean background</td> <td>2.4%</td> <td>1%</td> </tr> </tbody> </table>	Ethnicity	Homeless Households (Applicants) 2018/19* (lead applicants)	Westminster Population (GLA Ethnic Projections for 2018 – persons)	White: English/Welsh/Scottish/Northern Irish/British	19.7%	31%	White: Gypsy or Irish Traveller	0.08%	-	White: Irish	1.1%	-	Any other White background	8.4%	29%	Black: African	16.6%	4%	Black: Caribbean	6.8%	2%	Any other Black/African/Caribbean background	2.4%	1%
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Any other White background	8.4%	29%																							
Black: African	16.6%	4%																							
Black: Caribbean	6.8%	2%																							
Any other Black/African/Caribbean background	2.4%	1%																							

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Arab	20.8%	8%
Asian: Bangladeshi	2.3%	3%
Asian: Indian	1.1%	3%
Asian: Pakistani	1.2%	1%
Any other Asian background	4.3%	5%
Mixed/Multiple ethnic groups: White and Asian	0.5%	-
Mixed/Multiple ethnic groups: White and Black African	0.8%	-
Mixed/Multiple ethnic groups: White and Black Caribbean	1.7%	-
Any other Mixed/Multiple ethnic background	2.7%	5%
Any other ethnic group, including Chinese	9.0%	6%

*The data does not include households where their ethnic origin is unknown

Table 6: Households in temporary accommodation by ethnicity

Ethnicity	Homeless Households in temporary accommodation (lead applicants)*	Westminster population (GLA Ethnic Projections for 2018 – persons)
White	21%	60%
Black	25%	7%
Arab	21%	8%
Asian	16%	12%
Mixed	3%	5%
Other (includes Chinese)	13%	6%

*Doesn't include households where ethnic origin is unknown

Age

Table 7: Homeless Households by Age

Age	Homeless Households in temporary accommodation (lead applicants)	Homeless Households (Applicants) 2018/19 (lead applicants)	Westminster Population (2017 ONS Mid-year estimates, for adult population)
16-24	7%	17%	13%
25-44	65%	54%	45%
45-64	25%	27%	27%
65-74	2%	3%	8%
75+	1%	1%	7%

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	<p>The proportion of young people in temporary accommodation (aged 16 – 24) is below their population share, although applicants were over represented during 2018/19. The 25 – 44 age group are over represented, amongst temporary accommodation households and applicants during 2018/19 compared to their population share. This is the group that are most likely to have children. Older people are generally under represented.</p>																				
<p>Pregnancy and maternity/children in household</p>	<p>Table 8: Homeless Households and Family Composition</p> <table border="1" data-bbox="352 589 1275 1236"> <thead> <tr> <th data-bbox="352 589 571 875"></th> <th data-bbox="571 589 778 875">Homeless Households in temporary accommodation (lead applicant)</th> <th data-bbox="778 589 1066 875">Homeless Households (Applicants) 2018/19 (lead applicant)</th> <th data-bbox="1066 589 1275 875">Westminster Population (2011 Census)</th> </tr> </thead> <tbody> <tr> <td data-bbox="352 875 571 949">Pregnant women</td> <td data-bbox="571 875 778 949">13%</td> <td data-bbox="778 875 1066 949">See below*</td> <td data-bbox="1066 875 1275 949">See below**</td> </tr> <tr> <td data-bbox="352 949 571 1128">Households with children</td> <td data-bbox="571 949 778 1128">86%</td> <td data-bbox="778 949 1066 1128">44%</td> <td data-bbox="1066 949 1275 1128">19%</td> </tr> <tr> <td data-bbox="352 1128 571 1236">Of which are lone parents</td> <td data-bbox="571 1128 778 1236">48%</td> <td data-bbox="778 1128 1066 1236">8%</td> <td data-bbox="1066 1128 1275 1236">6%</td> </tr> <tr> <td data-bbox="352 1236 571 1236">Single people</td> <td data-bbox="571 1236 778 1236">14% (43% men 57% women)</td> <td data-bbox="778 1236 1066 1236">56% (60% men 40% women)</td> <td data-bbox="1066 1236 1275 1236">81% (54% men 46% women)</td> </tr> </tbody> </table> <p>*Details about pregnancy are not collected at this stage. **Information not available</p> <p>Households with children were over represented in those applying as homeless during 2018/19 compared to their share of the Westminster population and single people were under represented. However, during 2018/19, 56% of applications were from single people which compares to 14% living in temporary accommodation. Notably during 2018/19, 60% of applications from single people were from men.</p>		Homeless Households in temporary accommodation (lead applicant)	Homeless Households (Applicants) 2018/19 (lead applicant)	Westminster Population (2011 Census)	Pregnant women	13%	See below*	See below**	Households with children	86%	44%	19%	Of which are lone parents	48%	8%	6%	Single people	14% (43% men 57% women)	56% (60% men 40% women)	81% (54% men 46% women)
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Of which are lone parents	48%	8%	6%																		
Single people	14% (43% men 57% women)	56% (60% men 40% women)	81% (54% men 46% women)																		
<p>Religion or belief</p>	<p>This data is not gathered by the current reporting systems for either homeless applicants or households living in temporary accommodation. However, the data above on the ethnic backgrounds of applicants and households in TA gives some potential indication of different religions amongst homeless households. For instance, the fact that Arabic households were the most likely to be homeless applicants in 2018-19 (at a fifth of the total number) gives some indication that there is likely to be a larger proportion of Muslims amongst homeless households in Westminster than there is in the general Westminster population.</p>																				
<p>Economic activity</p>	<p>Homeless households, and those threatened with it, generally have low incomes, for example at least 46% of applicants were in receipt of benefits in 2018/19. This figure may well be higher as it includes those unable to clarify their benefits. Sometimes when households apply as homeless they are unable to confirm the benefit they receive and this is established later.</p> <p>Currently c50% of households in temporary accommodation are working either full or part time. As market rents are charged in temporary accommodation, nearly 100% of residents receive housing benefit.</p>																				

Table 9: Households receiving benefits

Benefit	Percentage of homeless applicants 2018-19 claiming benefit	Total Households in Westminster claiming benefits (residential units only) - Household Projections, ONS 2018 (2019 figures used)
Disability Benefits	4%	10.4%
Employment and Support Allowance	7%	2.7%
Income Support	3%	0.4%
Jobseeker's Allowance	5%	0.8%
State Pension and/or Pensioner Credit	2%	15%
Tax Credits	12%	0.6%
Universal Credit	12%	1.8%
Carer's Allowance	Unknown	2%
Other (including bereavement)	Unknown	1%
No benefits claim made / not able to clarify benefit	54%	65.3%
Total in receipt of benefits (where known)	46%	33.7%

This excludes housing benefit

The table above shows that homeless applicants are more likely to be in receipt of 'working age' benefits (e.g. ESA, Tax Credits, Universal Credit) than the local population, and less likely to be in receipt of disability benefits (which include DLA, PIP and SDA) or state pension and/or pensioner credit. The data above is not completely precise as some benefit claimants are in the process of being transferred over to Universal Credit.

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<p>2.2 Are there any groups with protected characteristic that are overrepresented in the monitoring information relative to their size of the population? If so, this could indicate that the proposal may have a disproportionate impact on this group even if it is a universal service.</p>	<p><i>If yes, provide details.</i></p> <p>Households who are currently in temporary accommodation (TA), are more likely to be (according to the data which is currently available):</p> <ul style="list-style-type: none"> • Female: 72% are in TA compared to 48% in the general population. However, since the introduction of the HRAct, more men (especially single men) have been approaching the council for housing support, and the numbers of men who approached in 2018/19 was comparable to the local population • From certain ethnic backgrounds, particularly Black (25% compared to 7% in the local population), Arab (21% compared to 8% in the local population) and Other minority (13% compared to 6% in the local population) • In the 25-44 age category (65% compared to 45% in the local population) • In a household with children (86% compared to 19% in the local population), and a lone parent (48% of households in TA with children, compared to 8% of households with children in the general population). <p>Households who approach the council as homeless are more likely to be (according to the data which is currently available, and based on approaches in 2018-19):</p> <ul style="list-style-type: none"> • From certain ethnic backgrounds, particularly Black African (16.6% compared to 4% of the local population), Black Caribbean (6.8% compared to 2% of the local population), Arab (20.8% compared to 8% of the local population) and Other ethnic minority including Chinese (9% compared to 6% in the local population). • In the 25-44 age category (54% compared to 45% in the local population) and in the 16-24 age category (17% compared to 13% in the local population) • In a household with children (44% compared to 19% in the local population). The numbers of lone parents amongst households with children who approach the council as homeless is only slightly higher than the proportion of lone parents within the local population (8% as opposed to 6%). • In receipt of working-age benefits, with 39% of homeless applicants receiving either Tax Credits, Universal Credit, Jobseeker’s Allowance, Employment and Support Allowance or Income Support, compared to 6.3% of the local population. This excludes Housing Benefit. <p>The most notable difference between households in TA and households approaching as homeless during 2018-19 (homeless applicants) is that applicants have included a higher proportion of men and fewer lone parent households.</p>
<p>2.3 Are there any groups with protected characteristics that are underrepresented in the</p>	<p><i>If yes, provide details.</i></p> <p>Overall, households who either approach the council as homeless or who are currently in temporary accommodation, are less likely to be:</p> <ul style="list-style-type: none"> • Men (Although during 2018/19, 60% of applications from single people were from men) • From certain ethnic backgrounds, particularly White, Asian or Other Mixed ethnicity • Older (from the 65+ age category)

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<p>monitoring information relative to their size of the population? If so, this could indicate that the service may not be accessible to all groups or there may be some form of direct or indirect discrimination occurring.</p>	<ul style="list-style-type: none"> • Single people (However, during 2018/19, 56% of applications were from single people which compares to 14% living in temporary accommodation).
<p>2.4</p>	<p>Does the project, policy or proposal have the potential to disproportionately impact on people with a protected characteristic? If so, is the impact positive or negative?</p>
	<p>There are a few proposals within the Homelessness Strategy which might have the potential to negatively impact on certain people. These proposals come from points 5,6 and 7 of the Strategy's ten-point plan, and are laid out below:</p> <p><u>Point 5: Making our housing services more transparent, accountable and accessible:</u></p> <p>Improving Digital Access to the Housing Solutions Service</p> <p>The Strategy envisages that digital access to the council's frontline housing services will be improved, so that more people can make a full homelessness application online. This has the potential to negatively impact on people with lower digital/computer literacy, which may include older people or people with certain disabilities, or people with less access to the internet, which may include people with lower incomes.</p> <p><u>Point 6: Better communicate what we can and can't offer:</u></p> <p>This Strategy proposal will include carrying out an information campaign targeting areas of Westminster where people are more at risk of homelessness, explaining the council's frontline housing services and what people can expect from it. It will also involve publishing 'what you can expect' leaflets and distributing these widely. These leaflets will explain, amongst other matters, why many households can expect a private rented rather than a social home, and will also convey the message that tackling homelessness requires the council and households affected by homelessness to work together collaboratively.</p> <p>The effect of this should largely be positive, as households at risk should be better informed of their housing support options at an earlier stage. However, there is a possibility that some households may be negatively impacted by the information campaign, if it causes them to choose not to approach the council when they would otherwise have done, or to approach the council later. There is a possibility that this may happen if residents interpret the campaign in negative terms, primarily noting the</p>

message that the council will often not be able to offer a social home, rather than the positive message around the services that the council can offer to those who are at risk of homelessness. If more households choose to delay their approach as a result of the campaign, this could lead to more households only approaching once they have reached a crisis stage and once homelessness can no longer be prevented. This could therefore have negative impacts on homeless households, who are more likely to have the protected characteristics outlined in section 2.1 above.

Point 7: Ensuring a range of accommodation is available for homeless households when homelessness cannot be prevented:

Continuing to make developing more affordable housing a priority for the council

The Strategy highlights the council's aim to develop at least 1,850 new affordable homes by 2023. Whilst this is clearly positive for homeless households, the council's City Plan 2019-2040 sets out that 40% of these newly developed affordable homes will be social rent or London Affordable Rent whilst 60% will be intermediate housing. Favouring intermediate housing could have a negative impact on homeless households who are more likely not to have the financial means to access it. Less social housing may also lead to homeless households being in temporary accommodation for longer, of which c50% is outside Westminster.

This 60/40% split of intermediate and social housing is broadly in line with the findings of Westminster's most recent Housing Needs Analysis, which estimates that 44% of the affordable homes required annually are social and 56% are intermediate. However, the Analysis differentiates between both types of affordable housing by describing social housing as 'need' i.e. for households with few choices and intermediate housing as 'demand', although it acknowledges there is cross over between the two.

However, the potential negative impacts of building more intermediate than social housing should be balanced against the fact that intermediate housing currently makes up less than 2% of Westminster's housing stock. This housing is primarily intended for people on moderate incomes, and there are currently very few opportunities for people on moderate incomes to secure any kind of accommodation in Westminster.

Further details on this affordable housing split and its potential impacts can be found in the City Plan Integrated Impact Assessment, available here:

https://www.westminster.gov.uk/sites/default/files/cityplan2040_integrated_impact_assessment_june_2019.pdf

Increasing the number of private rented sector offers we make

The Strategy envisages that the council will continue to make offers of settled accommodation in the private rented sector to certain homeless households rather than offering a social home, and that the number of these offers will increase. Whilst the council makes every effort to secure these offers in Westminster, the high cost of local market rents combined with the Local Housing Allowance levels not covering market rents means that these offers often have to be outside of Westminster. From January 2017 to January 2018, 24% of offers in the private rented sector were in Westminster or an adjoining borough, 71% were in Greater London, and 5% were outside London (Surrey and Berkshire).

Moving into private rented accommodation outside of Westminster can have a negative impact on homeless households (who are more likely to have the protected characteristics outlined above), as it

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can disrupt support networks and schooling. Generally, private rented sector properties also have shorter tenancy periods on average than social homes, tend to have higher rents and can sometimes be of poorer quality than social homes.

However, these factors have to be balanced against the positive impacts of being offered an offer of settled accommodation in the private rented sector, which often allow homeless households to have a housing offer made more quickly (compared to a current 10-year average waiting time for a 2-bed social home), and therefore provide households with the opportunity to end potentially very long waits in insecure temporary accommodation.

A full EIA has already been completed on the policy of making private rented sector offers for homeless households in Westminster, and this considers all these factors in greater detail. This can be found here: <https://committees.westminster.gov.uk/documents/s21009/Appendix%20-%20EIA.pdf>

The majority of proposals within the Homelessness Strategy will impact positively on all residents, especially those who are homeless or at risk of homelessness. However, due to the potential impact of the few proposals outlines above, the overall impact of the Strategy on all protected groups could in some instances be both positive and negative.

	None	Positive	Negative	Not sure
Men or women	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of a particular race or ethnicity (including refugees, asylum seekers, migrants and gypsies and travellers)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Disabled ⁴ people (consider different types of physical, learning or mental disabilities)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of particular sexual orientation/s	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People in particular age groups (consider in particular children, under 21s and over 65s)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People who are intending to undergo, are undergoing or have undergone a process or part of a process of gender reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Impact due to pregnancy/ maternity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People of particular faiths and beliefs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
People on low incomes	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

⁴ Disability discrimination is different from other types of discrimination since it includes the duty to make reasonable adjustments.

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	<p>If any of the answers to the questions above is, “negative” or “unclear” you will need to undertake a detailed impact assessment.</p>
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2.5	Based on your responses, should a full, detailed EIA be carried out on the project, policy or proposal
	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
2.6	Provide brief reasons on how have you come to this decision?
	A small number of the proposals within the Homelessness Strategy have the potential to have both positive and negative impacts on households at risk of homelessness, who are more likely to have certain protected characteristics. As set out in section 3 below, the final Strategy will seek to mitigate these potential negative impacts.

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SECTION 3: ASSESSING THE IMPACT

This section of the EIA assesses the potential impact of the policy (positive and negative) of the homelessness strategy on all groups with protected characteristics.

Table 3.1 lays out the potential impacts from the first section of the strategy: **Preventing more people from becoming homeless in the first place**. This section includes the following sub-proposals:

1. To reach more people at risk of homelessness at an earlier stage
2. To make the council's services more visible through information campaigns
3. To proactively offer personalised support to those at risk of homelessness where possible
4. To do more to identify the main causes of homelessness in Westminster

Positive impacts:

- Preventing households from becoming homeless and offering early support should positively impact on all residents who are at risk of homelessness, including all groups with protected characteristics. It may have a particularly positive impact for groups that are currently unlikely to be able to be supported with housing from the council (often because they do not qualify for priority social housing), particularly single people.

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Table 3.1

Protected Group	Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
	Eliminate discrimination	Advance equality	Good relations				
Points 1-4 of the Strategy: Preventing more people from becoming homeless in the first place							
Gender	Men	X	X	X			
	Women	X	X	X			
Race	White	X	X	X			
	Mixed/Multiple ethnic groups	X	X	X			
	Asian/Asian British	X	X	X			
	Arab	X	X	X			
	Black/African/Caribbean/ Black British	X	X	X			
	Gypsies / travellers	X	X	X			
	Other ethnic group	X	X	X			
Disability	Physical	X	X	X			

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	Sensory	X	X	X				
	Learning Difficulties	X	X	X				
	Learning Disabilities	X	X	X				
	Mental Health	X	X	X				
Sexual Orientation	Lesbian, gay men, bisexual	X	X	X				
Age	Older people (50+)	X	X	X				
	Younger people (16 - 25)	X	X	X				
	Children	X	X	X				
Gender Reassignment		X	X	X				
Impact due to pregnancy/maternity		X	X	X				
Groups with particular faiths and beliefs		X	X	X				
People on low incomes		X	X	X				

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Table 3.2 lays out the potential impacts from the second section of the strategy: **Improving our services and response when people become homeless**. This section includes the following sub-proposals:

5. To make our housing services more transparent, accountable and accessible
6. To better communicate what we can and can't offer
7. To ensure a range of accommodation is available when needed
8. To review access to supported housing now and for the future

Positive impacts:

- Most of the proposals within this section should have a positive impact on existing and future homeless residents, and some of the proposals should have a particularly positive impact on more vulnerable residents. These include the proposal to apply learning from our Making Every Adult Matter (MEAM) pilot and rolling this out across services, because this aims to make the council better at supporting the needs of people at risk of homelessness who face multiple disadvantages. These disadvantages could include mental or physical disability, and this could therefore have a particularly positive impact on residents with this protected characteristic.
- The proposal to review how people access the council's supported housing stock and ensure it meets needs in the future could also have a particularly positive impact on vulnerable residents. This should especially include young people (e.g. care leavers and unaccompanied asylum-seeking children) whose needs will be reviewed as part of the wider supported housing review. The council will also be re-procuring its offender services contract and considering how to better support the needs of young offenders.
- This section also includes a proposal to set up a new annual Partnership Board, which would be made up of people that use the council's homelessness services and members of the community. The aim of the Board would be to get views on the council's services and hold the council to account, as well as giving the council an opportunity to more clearly explain some of its decisions. This should have a positive impact on all groups by bringing together individuals who would not usually meet and fostering greater collaboration and understanding between Westminster's communities.

Negative impacts:

- The proposal to ensure that a range of accommodation is available for homeless households includes an action to increase the number of settled private rented sector offers the council makes. As laid out in section 2.4 above, this could impact both positively and negatively upon homeless

APPENDIX D

households, with negative impacts including households having to move out of the borough and having potentially lower quality and less secure housing through the private rented sector than through having a social home.

- The proposal to build 1,850 new affordable homes in Westminster by 2023, whilst generally positive for all groups, does envisage that these homes will favour intermediate housing (60% of the total) more than social housing (40% of the total). This could potentially have a negative impact on homeless households, who are less likely to be able to afford intermediate housing and may therefore having to spend longer in temporary accommodation.
- The proposals to improve digital access to the Housing Solutions Service and to develop an online referral system for supported housing could have potential negative impacts on people with lower digital literacy or access.
- The proposal to carry out an information campaign setting out what the council can and can't offer could have potential negative effects on households at risk of homelessness if it discourages them from making an approach to the council until after their homelessness cannot be prevented (see section 2.4 above).

Table 3.2

Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Points 5-8 of the Strategy: Improving our services and response when people become homeless								
Gender	Men	X	X	X	Possible private rented sector offer impacts: lower quality housing, higher rents, geographical displacement Possible delay in approaching council resulting from		Offers of settled accommodation in the private rented sector: <ul style="list-style-type: none"> • All offers of settled accommodation in the private rented sector will be carefully reviewed to ensure they meet needs of households (e.g. housing is of sufficient quality, 	

					<p>information campaign, resulting in poorer outcomes</p> <p>Possible lack of available social housing in future due to council’s affordable housing target envisaging 60% intermediate housing and 40% social housing</p>		<p>meets affordable rent levels). For more information, see the EIA on the PRSO Policy for Homeless Households: https://committees.westminster.gov.uk/documents/s21009/Appendix%205%20-%20EIA.pdf</p> <ul style="list-style-type: none"> • The council will lobby for changes to the welfare system so it works better in central London • The council will recruit ‘Community connectors’ to help people settle in new areas • The council will look at ways to offer households more choice over the location of their PRSOs <p>Information campaign:</p> <ul style="list-style-type: none"> • The council will ensure the information campaign puts strongest emphasis on the wide range of support services for residents and makes clear that households should still approach the council and/or other sources of support <p>Affordable housing target (intermediate and social):</p> <ul style="list-style-type: none"> • Households on the council’s social housing register will have a high priority for any intermediate housing. • Targets will be set to ensure a proportion of new intermediate housing is affordable to households on the register with lower quartile incomes – and so may be affordable to households also registered for social 	
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							<p>housing. Westminster Employment Service also helps homeless households into employment which will help homeless households to be eligible for intermediate housing.</p> <ul style="list-style-type: none"> By setting a higher housing target than is required by the London Plan and by increasing the affordable housing requirement to 35% - this will increase social housing provision to levels that may otherwise not have been delivered. 	
	Women	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
Race	White	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Mixed/Multiple ethnic groups	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Asian/Asian British	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Arab	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Black/African/Caribbean/Black British	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Gypsies / travellers	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Other ethnic group	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	

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Disability	Physical	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Possible disadvantage from increasing digital access to frontline housing services and developing an online referral system for supported housing</p>		<p>As above</p> <p>Digital access to frontline housing services:</p> <ul style="list-style-type: none"> The council will continue to offer face to face appointments for frontline housing services and traditional methods for supported housing referral 	
	Sensory	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Digital access (as above)</p>		As above (plus the mitigation around access to front line housing services)	
	Learning Difficulties	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Digital access (as above)</p>		As above (plus the mitigation around access to front line housing services)	
	Learning Disabilities	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Digital access (as above)</p>		As above (plus the mitigation around access to front line housing services)	
	Mental Health	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p> <p>Digital access (as above)</p>		As above (plus the mitigation around access to front line housing services)	
Sexual Orientation	Lesbian, gay men, bisexual	X	X	X	<p>PRSOs, delayed approach following information campaign (as above)</p>		As above	

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Age	Older people (50+)	X	X	X	PRSOs, delayed approach following information campaign (as above) Digital access (as above)		As above (plus the mitigation around access to front line housing services)	
	Younger people (16 - 25)	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
	Children	X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
Gender Reassignment		X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
Impact due to pregnancy/maternity		X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
Groups with particular faiths and beliefs		X	X	X	PRSOs, delayed approach following information campaign (as above)		As above	
People on low incomes		X	X	X	PRSOs, delayed approach following information campaign (as above) Digital access (as above)		As above (plus the mitigation around access to front line housing services)	

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Table 3.3 lays out the potential impacts from the third section of the strategy: **Meeting the challenges ahead and having a homelessness system fit for the future**. This section includes the following sub-proposals:

9. To become a leader in the field of homelessness prevention by proposing solutions and bringing decision-makers together
10. To make the case to Government for homelessness services and prevention work to be fully funded by leading the discussion with Government and others on how the welfare system can work better for low income residents in central London, while also utilising every other funding source available to us.

Positive impacts:

- The impacts from these strategy proposals should be positive for all protected groups. In particular, point 10 aims to highlight to central government the problems with the existing benefits system (and especially that Local Housing Allowance levels for central London need to be more reflective of actual rents), which could eventually result in changes with positive impacts for all groups and especially those with lower incomes.
- The proposals also envisage that the council will lobby the government to allow the council to pilot new local levies related to service use, and to give the council the ability to introduce additional council tax bands. The revenue from these would be used to invest in communities and vulnerable residents. There is the possibility that future new levies and council tax bands may impact financially on some residents, however it is expected that the impact would predominantly be on residents with higher incomes.

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Table 3.3

Protected Group		Positive impact?			Negative impact? If so, please specify the nature and extent of that impact*	No specific impact	If the impact is negative how can it be mitigated? Please specify any mitigation measures and how and when they will be implemented	What , if any, are the cumulative effects of this decision when viewed in the context of other Council decisions and their equality impacts
		Eliminate discrimination	Advance equality	Good relations				
Points 9-10 of the Strategy: Meeting the challenges ahead and having a homelessness system fit for the future								
Gender	Men	X	X	X				
	Women	X	X	X				
Race	White	X	X	X				
	Mixed/Multiple ethnic groups	X	X	X				
	Asian/Asian British	X	X	X				
	Arab	X	X	X				
	Black/African/Caribbean/Black British	X	X	X				
	Gypsies / travellers	X	X	X				
	Other ethnic group	X	X	X				
Disability	Physical	X	X	X				
	Sensory	X	X	X				

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	Learning Difficulties	X	X	X				
	Learning Disabilities	X	X	X				
	Mental Health	X	X	X				
Sexual Orientation	Lesbian, gay men, bisexual	X	X	X				
Age	Older people (50+)	X	X	X				
	Younger people (16 - 25)	X	X	X				
	Children	X	X	X				
Gender Reassignment		X	X	X				
Impact due to pregnancy/maternity		X	X	X				
Groups with particular faiths and beliefs		X	X	X				
People on low incomes		X	X	X				

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SECTION 4: ACTION PLAN

<p>4.1 Complete the action plan if you need to reduce or remove the negative impacts you have identified, take steps to foster good relations or fill data gaps.</p> <p><i>Please include the action required by your team/unit, groups affected, the intended outcome of your action, resources needed, a lead person responsible for undertaking the action (inc. their department and contact details), the completion date for the action, and the relevant RAG rating: R(ed) – action not initiated, A(mber) – action initiated and in progress, G(reen) – action complete.</i></p> <p>NB. Add any additional rows, if required.</p>							
Page 144	Action Required	Equality Groups Targeted	Intended outcome	Resources Needed	Name of Lead, Unit & Contact Details	Completion Date (DD/MM/YY)	RAG
	Refine planned information campaign on our services and ‘what you can expect’ leaflets to achieve positive message, and test these with a service user group See 6.1 of the Homelessness Strategy Action Plan	All	Households at risk of homelessness are encouraged to seek support at any early stage, whilst understanding that there are other housing solutions other than the offer of a social home	Existing	Communications and Engagement Manager Policy, Performance and Communications		
	Investigate recruiting ‘Community Connectors’ (to help homeless households settle in new areas, especially with private rented sector offers), through using social impact bonds	All	Council has funding to employ Community Connectors, who will help households to put down roots outside of Westminster rather than waiting in TA	TBA (subject to funding)	Homeless Contract and Performance Manager Growth, Planning and Housing		

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	See 7.3 of the Homelessness Strategy Action Plan						
	<p>Test out the council's new digital application process for frontline housing services with a service improvement group to ensure it meets everyone's needs</p> <p>See 5.4 of the Homelessness Strategy Action Plan</p>	All	Better understand the needs of applicants and ensure that no residents are disadvantaged by digital solutions	Existing	<p>Homeless Contract and Performance Manager</p> <p>Growth, Planning and Housing</p>		

THIS SECTION TO BE COMPLETED BY THE RELEVANT SERVICE MANAGER



SIGNATURE:

FULL NAME:Neil Wightman – Director of Housing.....

UNIT:Growth, Planning and Housing.....

EMAIL & TELEPHONE EXT:nwightman@westminster.gov.uk 020 7641 3625.....

DATE (DD/MM/YYYY):20th December 2019.....

WHAT NEXT?

It is the responsibility of the service to complete an EIA to the required standard and the quality and completeness of EIAs will be monitored by EMT.

All EIAs for proposed changes to levels of service arising from budget proposals must be completed by (insert date).

All completed EIAs should be sent to Equalities@westminster.gov.uk



Housing, Finance and Regeneration Policy and Scrutiny Committee

Date:	17 th March 2020
Classification:	General Release
Title:	2019/20 Work Programme
Report of:	Director of Policy, Performance & Communications
Cabinet Member Portfolio	Cabinet Member for Finance, Property and Regeneration Cabinet Member for Housing Services
Wards Involved:	All
Policy Context:	All
Report Author and Contact Details:	Aaron Hardy x 07971 026070 Ahardy1@westminster.gov.uk

1. Executive Summary

1. This report presents the 2019/20 work programme to the committee for its consideration.

2. Key Matters for the Committee's Consideration

- 2.1 The Committee is asked to:

- Review and approve the draft list of suggested items (appendix 1) and prioritise where required
- Note the action tracker (appendix 2)

3. Topic Selection

- 3.1 The proposed list of topics (Appendix 1) takes in to account comments by the committee at its previous meeting.

**If you have any queries about this Report or wish to inspect any of the
Background Papers, please contact Aaron Hardy**

ahardy1@westminster.gov.uk

APPENDICES:

Appendix 1 - Suggested topics

Appendix 2- Action Tracker

WORK PROGRAMME 2019/2020
Housing, Finance and Regeneration Policy and Scrutiny Committee

ROUND FOUR 17 March 2020		
Agenda Item	Reasons & objective for item	Represented by
Cabinet Member Q&A	To update the committee on key areas of work within its remit and the Cabinet Member's priorities	Councillor David Harvey, Cabinet Member for Housing Services
Cabinet Member Q&A	To update the committee on key areas of work within its remit and the Cabinet Member's priorities	Councillor Melvyn Caplan, Cabinet Member for Finance, Property and Regeneration
Fire Safety	Update on fire safety.	Neil Wightman, Director of Housing
Homelessness Strategy	Call-in of Cabinet Member decision	Councillor David Harvey, Cabinet Member for Housing Services

ROUND SIX 23 APRIL 2020		
Agenda Item	Reasons & objective for item	Represented by
Cabinet Member Q&A	To update the committee on key areas of work within its remit and the Cabinet Member's priorities	Councillor David Harvey, Cabinet Member for Housing Services
Cabinet Member Q&A	To update the committee on key areas of work within its remit and the Cabinet Member's priorities	Councillor Melvyn Caplan, Cabinet Member for Finance, Property and Regeneration
Development	Investigate the council's development and delivery of the capital program. Item should include a site visit to Dudley House or Beachcroft.	

UNALLOCATED ITEMS		
Agenda Item	Reasons & objective for item	Represented by
Universal Credit Rollout	Review the impact on Residents of the rollout of universal credit (link with Family and People Services Policy and Scrutiny Committee)	
Housing strategy	Review the approach to developing/updating a housing strategy	
Domestic Abuse	Review of women's refuge provision. How have changes in funding been implemented and how will it affect services?	
Empty Properties	Review the approach to developing an empty properties policy or strategy	
Business rates	Review the impact of business rates changes on local businesses and the Council's finances	
Housing Management Services	Update on housing management services following transition in house	Director of Housing
Housing Revenue Account Business Plan	Review the HRA Business Plan	Director of Housing

TASK GROUPS AND STUDIES		
Subject	Reasons & objective	Type
Budget Task Group	Annual review of budget setting	Task Group
Major works		Task Group

ACTION TRACKER 2019/20
Housing, Finance and Regeneration Policy and Scrutiny Committee

ROUND THREE 18 NOVEMBER 2019		
Agenda Item	Action	Update
Cabinet Member Q&A – Cabinet Member for Finance, Property and Regeneration	In future when providing information on development schemes can we have breakdown of how many housing units are social/intermediate and how many are new/re-provided	In progress
	Provide the definition for under-occupancy in a housing renewal areas.	Completed
	Provide an update on Lisson Arches	Completed
Cabinet Member Q&A – Cabinet Member for Housing Services	Look in to why has there been a drop in full homelessness duty acceptances	Completed
	Check what’s being done to make sure that new developments do not have flammable cladding and are complying with fire safety regulations	Completed
	Send an update early 2020 on rollout of TMOs and enforcement in areas where it’s been done.	In progress

ROUND TWO 12 SEPTEMBER 2019		
Agenda Item	Action	Update
Cabinet Member Q&A – Cabinet Member for Housing Services	Provide an update on how much parking enforcement has been rolled out on former CWH estates to date and what is the completion date for the rest?	Completed
	Provide Councillor Noble with a note on s20 process	Completed
	In the next cabinet member update provide an update on the change of approach in the council’s asset strategy to use	In progress

	temporary accommodation as a source of capital investment.	
Regeneration Update	What were the specific reason the Council did not apply for GLA funding for regeneration schemes? (the funding that was £100k per unit)	Completed
Call-In	Provide an update on Does Westminster have any Temporary Accommodation with ACM cladding on it?	Completed

ROUND ONE 5 JUNE 2019		
Agenda Item	Action	Update
Cabinet Member Q&A – Cabinet Member for Finance Property and Regeneration	Circulate details of which officers are responsible for which services in the new housing management team	Completed
	In Councillor Smith’s next update include the details of fire door inspections	In progress
	Reply to Cllr Elcho’s query regarding the use of drop keys	Completed
Cabinet Member Q&A – Cabinet Member for Housing Services	Provide a briefing on the council’s apprenticeship scheme	Completed
	Provide a note on the number of homes the council has started/completed year by year as well as a list of schemes on site	Completed