

Homelessness Accommodation Strategy 2016-2019

February 2016



1. INTRODUCTION

- 1.1 Homelessness is associated with worse health outcomes and poor educational attainment. Recent research has focused on the negative health and life outcomes for children who experience periods of homelessness. The Camden Plan seeks to reduce inequality and child poverty and this homelessness accommodation strategy will be a key contributor to these objectives.
- 1.2 As a result of the Council's strong focus on an individually tailored approach to homelessness prevention, the use of Camden's "Adult Pathway" and changing demographics (less households reliant on housing benefit living in the private rented sector) there are comparatively few statutorily homeless households in Camden and numbers have been falling over recent years. This compares favourably to the position in a number of other London boroughs where numbers are increasing. There are however pressures developing with increasing rental costs, decreasing Government welfare provision, proposed legislative changes reducing the amount of affordable housing and continuing Government pressures on Council finances. It is therefore timely to refresh the Council's homelessness accommodation strategy.
- 1.3 For the next 5 years the key strategic objectives will be:
- To continue to focus on the prevention of homelessness and to provide sustainable housing options (e.g. through procurement of suitable private sector properties to help families avoid becoming homeless; allowing access within the Council's allocations scheme to the limited amount of social housing available and Camden's adult / young person's pathway)
 - Reducing the use of temporary accommodation still further to a level consistent with an emergency core provision for emergency use only.
 - Meeting the Council's statutory duty to provide housing for homeless families against a context of unaffordable accommodation in Camden and inner London.
- 1.4 This homelessness accommodation strategy will operate alongside the Council's housing allocations scheme, private rented sector strategy and the Camden Plan and is necessarily compliant with a range of legislation and guidance including:
- The Housing Act 1996, as amended by the Homelessness Act 2002
 - The Localism Act 2011 and Supplementary guidance
 - Supplementary guidance on homelessness 2012
 - Equality Act 2010
 - Suitability of Accommodation Order 2012
 - Homelessness Code of Guidance 2006

- The Children’s Act 2004 (section 11)

1.5 In accordance with section 208, the Accommodation Order 2012 and related statutory guidance, the Council is obliged to accommodate homeless applicants in Camden so far as reasonably practicable or, where that is not reasonably practicable, as near to where they were previously living as possible. This strategy seeks to procure accommodation in line with these obligations.

1.6 In deciding what is reasonably practicable, authorities can take account of the resources available to them. The costs of the temporary accommodation provided by the Council are set out below. Given the pressures on the Council's resources it is not reasonably practicable to increase the amount spent on temporary accommodation and the Council is looking to reduce the amount spent as the need for temporary accommodation reduces. Given those pressures households are expected so far as possible to meet the cost of accommodation from their own resources or housing benefit where they are entitled to it.

2. THE CURRENT POSITION IN CAMDEN

2.1 The Council has a strong track record in working with households to prevent homelessness (Chart 1 below).

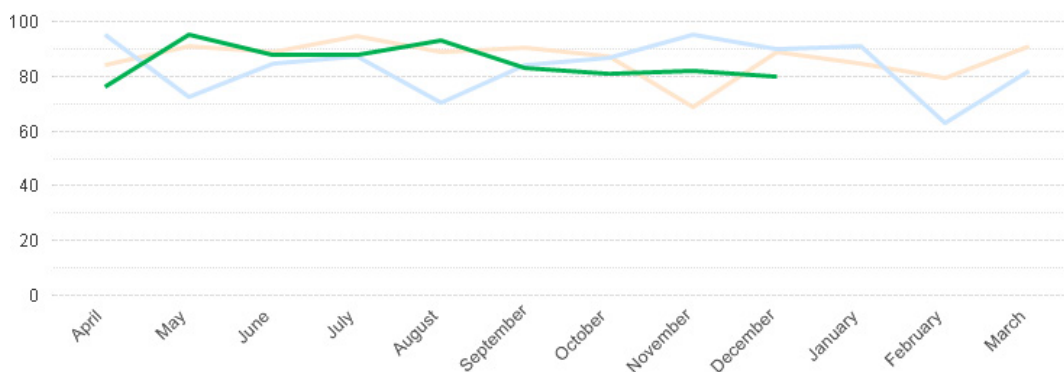
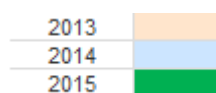


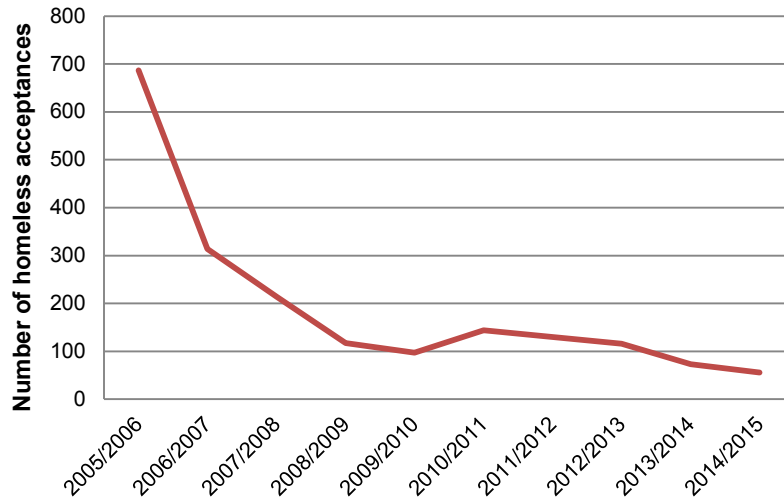
Chart 1: Prevention rates (%) year by year



2.2 The impact of homelessness prevention work and changing demographics means that Camden has a relatively low level of families requiring temporary accommodation. The Council’s strategy to focus on providing an individually tailored approach to preventing homelessness, by supporting families to remain in their current home or secure suitable housing in the private rented sector, means that under new 100 cases per year now require temporary accommodation (Chart 2). Most homelessness applications (for temporary

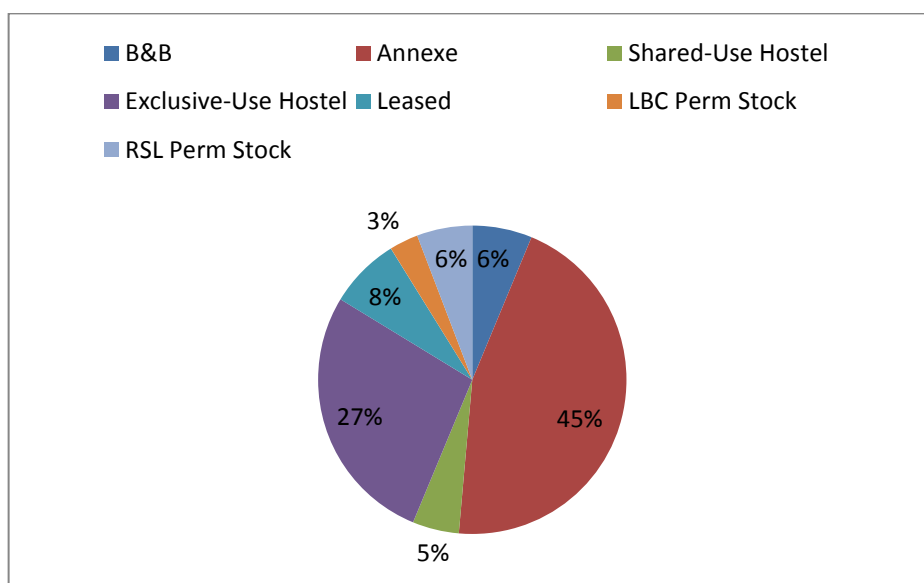
accommodation) are now made either because the client has refused an offer of private sector accommodation, or because they are deemed too vulnerable to be suitable for a private tenancy at that time.

Chart 2: New homelessness cases (acceptances) in Camden



2.3 Good progress is being made towards the target for this financial year of reducing the number to 425 families in temporary accommodation; there has been a fall from 493 to 430 between April and December 2015. This compares favourably with the most recent data available for London (March 2015) that shows an increase in the numbers in temporary accommodation of 11%. Whilst self-contained accommodation, paid for at a nightly rate and managed by agents (annexes), accounts for almost half of placements, family hostels are central to the homelessness accommodation strategy and enable the Council to house families in borough. At present around 90% of annexe accommodation is out of borough, with a small number of placements just outside London. Annexe accommodation allows for greater flexibility and is used to house families who are not suited to hostels, such as larger families who would need to occupy multiple rooms in a hostel, or families with children with special needs not suited to hostel living.

Chart 3: Temporary Accommodation by Provision, December 2015

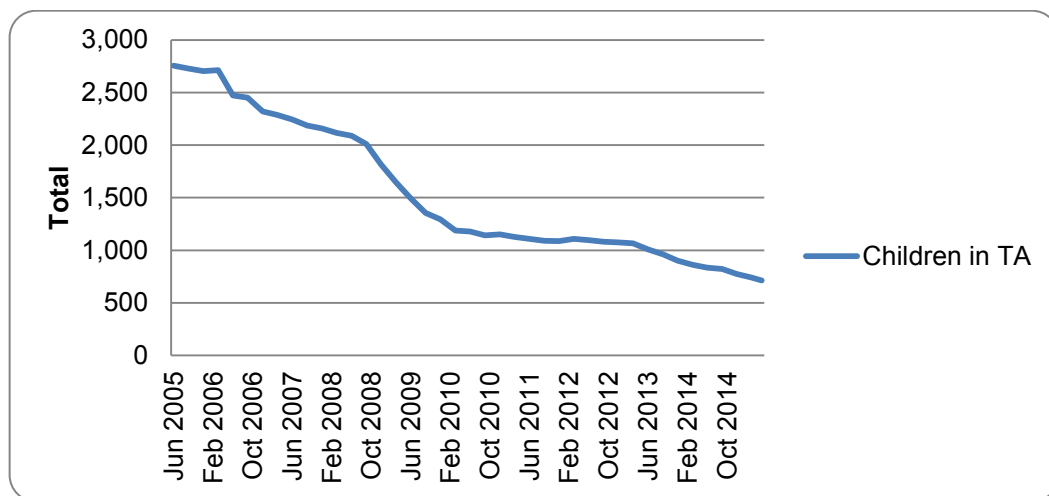


Base: 430 households

- 2.4 Camden has a higher number of households who have lived in temporary accommodation for longer periods than the London average. A Shelter survey of 23 London boroughs showed that 19% of households have lived in temporary accommodation for 5-10 years (compared to 22% in Camden) and 3% for more than 10 years (compared to 17% in Camden). This relatively higher percentage should, however, be taken in the context of Camden's low overall numbers of residents in temporary accommodation. As the numbers in temporary accommodation have fallen (from over 2,000 in 2004 to 430 as of December 2015), a complex cohort of households remain who have often refused an offer of a home in the private sector, even within Camden. Access to social housing is limited for this group, as the Council promotes homelessness prevention through its allocations scheme, and avoids incentivising people to seek temporary accommodation as a way of securing a Council home.
- 2.5 The majority of Camden placements in temporary accommodation were families with dependent children (82%), rather than for any specific health related reason. The floating support service currently works with only a small number of temporary accommodation residents whose support needs extend beyond stable housing. However, applicants with accessibility needs (34%) are over-represented among people accepted as homeless compared with the general population (14%). There were also 6 residents known to Camden Learning Disability Service who had been placed in temporary accommodation by Camden as of December 2015. Accessibility needs are taken into consideration when placing households in temporary accommodation. This may include placement in ground floor properties or properties with a lift or making modifications such as grab rails as appropriate

with landlord consent. The Council’s family hostels comply with the recommendations made in recent reports into health and wellbeing of families experiencing homelessness through the provision of health clinics and after-school groups. Local organisation C4WS are providing extra-curricular activities for children in temporary accommodation. There is evidence linking poor educational attainment to living in temporary accommodation.¹ Significant work has been undertaken to reduce the numbers of children in temporary accommodation in Camden (chart 4). This complements the priority given to improving the lives of children in the new Council allocation scheme and its focus on dealing with overcrowding.

Chart 4: Children in Part VII Homelessness Temporary Accommodation



- 2.6 In Camden, single homeless people are offered accommodation and tailored support through the “Adult Pathway” which provides approximately 700 beds across the borough in a mixed provider market of the Council, charities and registered providers. There are four stages of accommodation and support provided – assessment, specialist, engaging support and move-on – and single homeless people stay in the pathway for an average of two years before moving on to independent living in either social or private rented accommodation. The Adult Pathway remains central to the Council’s homelessness prevention strategy for single homeless people.
- 2.7 Rough sleeping by people that the Council do not have a duty to house is the most extreme and visible form of homelessness. The Council has long taken a lead in responding to this issue. Performance remains positive even though the number of people sleeping rough is increasing nationally, across the capital and in the borough. As many as 530 different individuals rough sleeping have been seen in Camden so far this year (a rise of about 20% on last year’s figures). There do not appear to be any specific local drivers for this increase but the impact of the last recession and economic migration may be contributing factors. In Camden there are a slightly lower percentage of foreign nationals than the London average but it is still only just under the

¹http://england.shelter.org.uk/campaigns /why we campaign/tackling_homelessness/what_is_homelessness_like#_ref10

50% mark. The majority of foreign nationals, including those from the European Economic Area, can no longer be placed in the pathway due to Government limitations on housing benefit claims. A number of the UK and Irish nationals sleeping rough in Camden will also not be eligible for long term assistance from Camden as their local connection is to another local authority. As with EEA nationals, individuals without a local connection to Camden are offered a reconnection service to their local authority. This is usually offered through the “No Second Night Out (NSNO) Provision” which acts as a triage service for identified rough sleepers. Reconnection is refused in the vast majority of cases. For example of the 43 European nationals that LBC have placed in NSNO since January last year only 8 accepted reconnection to their home countries. Of the 120 reconnections offered in 2015 only 10 have been successful. Further work is being undertaken to develop the council’s strategy for tackling rough sleeping given the increase in numbers, particularly in regards to managing the issue of people with no recourse to public funds.

3. RISKS AND CHALLENGES

Preventing homelessness will become even more challenging in the future, in particular as a result of legislative and welfare environment changes. The key challenges that this strategy seeks to address are set out below

Challenge/risk	Potential impact
Welfare change	
Reduction in the total benefit cap	<p>The reduction in the total benefit cap to £23,000 for families and £15,410 for single people could potentially cause an increase in homelessness approaches where households (of all sizes) can no longer afford their rent or to find alternative housing for themselves.</p> <p>This will also impact on the Council’s ability to find suitable affordable private rented sector accommodation within the borough and London more widely. Initial estimates are that 300 residents in the borough will be affected by the proposed lower cap, mostly living in the private rented sector.</p> <p>Support can be offered to these households through discretionary housing payments (DHPs) as an interim measure whilst more permanent solutions are found. There are already 32 households in temporary accommodation in receipt of a DHP (August 2015). Long-term reliance on DHPs is not sustainable.</p>
Universal credit (UC)	There is a risk of increased homelessness due to non-payment of rent, particularly where sanctions or conditionality are attached to the payment of UC.

	<p>At the lower end of the rental market, there is a further risk in reducing the Council's ability to procure accommodation where landlords have previously been used to direct payments.</p> <p>The first phase of the rollout of UC in Camden will start in March 2016 for new single job seeking claimants. For other new claimants, the rollout will start at some point between April 2016 and April 2018. There is no confirmed date for transferring existing claimants onto the new system but the DWP have said this will be completed for working age claimants by April 2021.</p>
Freeze on benefits and LHA	This will have a further impact on the affordability of rents in Camden and London and will potentially lead to an increase in homeless presentations.
Reducing procurement opportunities	The pressures in the London housing market are widely documented. The spiralling cost of private rented accommodation in Camden and across London has made it more difficult to procure suitable, affordable accommodation. The average rent for a two bedroom private rented property in Camden is £460 per week and the Local Housing Allowance for a two bedroom property is £302 per week. The gap between average rents and LHA is widening, even in historically cheaper areas of London where we have previously been able to procure affordable private rented accommodation. This, coupled with increased competition between authorities for procurement opportunities and the impact of welfare change, will increase pressure further.
Recent legal case law	The outcome of recent legal challenges has emphasised the obligations on authorities in relation to the location of accommodation and the need to evidence and explain compliance with those obligations.
Customer choice	There is a risk that households will not be willing to move. A large proportion of families that were temporarily housed before the Localism Act 2011 have already refused an in-borough private sector offer and are waiting, despite information and advice on the scarcity of social housing supply, for an offer of a Council or housing association property.
Right to Buy and Sale of High Value Voids	This is likely to reduce number of Council homes made available for allocations (perhaps as many as

	<p>300 fewer, or around one third each year), thus decreasing the number of families rehoused into social housing and increasing the TA population.</p> <p>The reduction in available social housing allocations will also increase demand for PRS with a potential for further rental price inflation.</p>
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4 CONTINUING WORK ON PREVENTION OF HOMELESSNESS

4.1 The Council seeks to prevent homelessness by offering tailored housing solutions to people approaching for support. The aim is to make sustainable longer term housing options more attractive than the option of entering costly and less attractive temporary accommodation. For those families choosing to follow a statutory route, the Council will identify suitable short term housing and then make a single offer of suitable private rented property to them, to discharge its duty.

4.2 In order to maximise the effectiveness of this approach a range of policies are necessary covering:

- The continued availability of a core of short term emergency hostel accommodation to house families whilst an offer of private rented accommodation is arranged
- Procurement of suitable private rented accommodation
- Access to Social Housing
- Access to Supported housing for more vulnerable residents through the Children's and Adults' Pathway

4.3 Procurement of sustainable private rented accommodation

To maintain the success rate in this area, the Council will need to procure affordable private rented accommodation and inevitably this will need to be both inside and outside of London. Ensuring that the Council provides good quality accommodation is central to the homelessness prevention strategy. The landlords that the Council work with have to hold all the relevant certificates (including electrical, gas and fire safety as well as energy performance), provide tenancy agreements, ensure that their properties are well maintained and structurally sound and demonstrate that they are a fit and proper landlord through an accreditation with an organisation recognised by the London Rental Standard. The Council works independently and also with other boroughs inside and outside the North London housing sub-region to maximise the number of suitable private rented sector homes that are procured. Costs are variable as procurement is demand led and the rent chargeable is constrained by housing benefit rules.

The Council is currently managing to place c.80% of households in need of a private tenancy. Maintaining this level of placement will become increasingly

difficult as welfare changes and rent levels decrease affordability. It is estimated that 240 placements will be made in the PRS in 2016/17, of which approximately 50 will be Private Rented Sector Offers.

Year	Referrals (Demand)	Placements (Supply)
14/15	259	213
15/16 (6 months)	123	105

Property searches begin with the identification of any availability in Camden and procurement activities look to identify opportunities to take on properties in and around Camden. This is achieved by liaising daily with property suppliers to check on availability as well as seeking to identify new procurement streams, through various property publications. The vast majority of in borough supply, which last year represented 20% of family placements, is sourced through this method or from regular providers.

The Council has significantly increased communications activity to promote its offer to landlords. At present publications and websites such as RightMove and Zoopla are monitored for available properties and agents and landlords are called proactively to promote options available through Camden PRS schemes. The Council also regularly exhibits at property auctions to target landlords. The self-help PRS scheme provides a range of materials for applicants sourcing their own accommodation, including information for prospective landlords.

However, Camden is amongst the most expensive London boroughs to privately rent in, making finding suitable and affordable PRS properties extremely difficult. It is unlikely that a significant number of properties in Camden or neighbouring boroughs will be procured in the future. As so few properties now come onto the market at rents commensurate with the Local Housing Allowance, or at rent levels that are affordable to people on low to medium incomes it is necessary to provide incentives to landlords. Our PRS schemes are flexible and can be tailored to meet the varying needs of landlords in very challenging market conditions. Providers are offered a range of incentives to secure accommodation for our customers. These include paying rent in advance and deposits, offering deposit guarantees (bonds) or a non-refundable cash incentive. The amounts offered are in line with similar incentives provided by local authorities in the areas where procurement takes place.

4.4 Access to social housing

The council's new allocations scheme grants priority to families engaging with the Council to prevent their homelessness and awards a further 100 points to households where homelessness has been prevented for a period of six months.

4.5 Camden's adult / young persons' pathway

Camden's Pathways model has been successful in preventing homelessness amongst single homeless people with support needs and, after providing a period of stability, enables them to move on to independent accommodation. In recent years, 200-250 people have moved on annually from the Adult Pathway into independent accommodation, with a significant proportion moving into studio flats in the private rented sector procured by the Council. The Council has found it increasingly difficult to procure studio flats for this purpose and, as a result, fewer people have moved on from the pathway than in previous years. Clearly, if fewer people move on, there will be fewer vacancies in the Pathway for new single homeless people with support needs who present themselves to the Council. In 2015/16, the Council has held a strategic review of the Pathway in collaboration with stakeholders, and move on problems were considered to be a barrier to an effective Pathway. Recommendations arising from the review have yet to be finalised but it is likely that Pathway providers (charities and registered providers) will play a greater role from 2016 in securing move on for their service users rather than relying solely on the Council to secure the move on option.

5 REDUCING THE USE OF TEMPORARY ACCOMMODATION

5.1 Existing temporary accommodation provision

It is essential that value for money continues to be secured from existing accommodation. England's Lane, Belmont and Levine and Abbott family hostels remain core-elements of Camden's in-borough provision. As leased units, significant savings cannot be made without handing the properties back to the freeholder. However, value for money improvements can be achieved through void minimisation and efficient rent collection.²

5.2 Procurement in the private sector depending on demand

As well as providing accommodation to discharge the Council's housing duty under the Localism Act 2011 and to support homelessness prevention work, the private sector is also a source of flexible temporary accommodation paid for at a nightly rate (annexes). Costs are variable for such units, but they provide a vital part of the council's temporary accommodation portfolio for larger families and households who cannot be accommodated in hostels. When sourcing temporary accommodation in the private sector, care is taken in assessing the suitability of properties and landlords. To ensure the Council is achieving value for money, targeted work is being undertaken on the most expensive annexes currently in use, to identify whether cheaper alternative accommodation can be procured.

² The lease on England's Lane will currently expire in March 2024. Levine and Abbotts' lease renewal was agreed by Cabinet to be extended in January 2016 for a further 12 years until October 2026, as a core element of in-borough provision for homeless families. At current temporary accommodation levels, relinquishing these leases would not result in cost savings as a greater level of costly annex provision would be required.

5.3 Suitable accommodation

The Council makes enquiries into the health of all applicants and conducts medical assessments for households moving into temporary accommodation where medical issues have been flagged, and provides accommodation to meet any needs, for example wheelchair accessible units in accommodation procured specifically to meet mobility or other health needs. The council also takes into account people's employment, education, social care and other support needs.

5.4 Housing planning interviews and assisted bidding

A programme of housing planning interviews for all households in temporary accommodation initially focussed on Total Benefit Cap impacted families, and households who have spent long periods in temporary accommodation. As part of this process the individual needs of each household are assessed to determine the best approach to help the family into more secure housing, for example support around relocation costs or reconnection to services once they have moved into their new home. Assistance with bidding for housing has proved to be an effective solution for those with higher than average points to maximise their chance of securing social housing.

5.5 Tailored support for households in temporary accommodation

For vulnerable households living in temporary accommodation, advice and practical support (for example around budgeting and income maximisation) is given by the Council's Floating Support Service to help prepare the household for more secure accommodation where this is needed. Households in temporary accommodation outside of the borough who have expressed a willingness to remain where they are, are offered the option of support to help them find a property in the area of their choice. Tailored support is offered to those households relocating outside Camden, including assistance in applying for benefits in new location, income maximisation, access to childcare, schools and nurseries, access to health services (GPs and dentists) and practical help with moving (e.g. utilities).

Residents in temporary accommodation have been automatically transferred to the Council's new allocation scheme. Residents of temporary accommodation should benefit from assisted bidding and increased communication from the Council made possible under the new scheme without undermining the principle that prevention is a better option for new applicants. There is further potential within the new allocations scheme for some particularly vulnerable families in temporary accommodation to receive a "direct offer" where a void property has not been let following two rounds of bidding and shortlists. Further work will be undertaken with larger families where there are non-dependent children still living in the family unit who may wish to live independently.

5.6 Private Sector Sustainment

It is vital that once households are placed in private rented accommodation the tenancies are sustained. The Council provides support to households placed in PRS to achieve this. Families receive support for up to two years; however, this can be extended based on household need. As a result of this support, sustainment rates are high (for the first year, 93%, in the second year 87%). This will continue to be a feature of the Council's strategy as households are placed further outside of the borough.

6 MEETING THE COUNCIL'S STATUTORY DUTY TO PROVIDE HOUSING FOR HOMELESS FAMILIES AGAINST A CONTEXT OF UNAFFORDABLE ACCOMMODATION IN CAMDEN AND INNER LONDON

6.1 For vulnerable households, suitable accommodation will be sought in Camden, otherwise, and in an increasing number of cases, properties outside of London may be needed. For all households relocated out of borough, appropriate resettlement support will be provided. Under section 11 of the Children Act 2004 the Council has a duty to have regard to the need to safeguard and promote the welfare of children. The Council's obligations in relation to the location of the accommodation support the ability of children to occupy suitable accommodation with their parents in locations which minimise disruption to their education and the other aspects of their lives so far as reasonably practicable. Unfortunately, it is not always reasonably practicable to house families with children in locations which avoid the need to consider changing schools and the other disruption associated with a move to a new area. Any offer of an out of borough placement will be given in line with a "placement policy" with due consideration to the household's social network and connections to the borough as well as other relevant factors such as employment or education opportunities. Priority for placement in or with easiest access to Camden will be given to households based upon the priority need matrix (contained within the placement policy appended to this document).

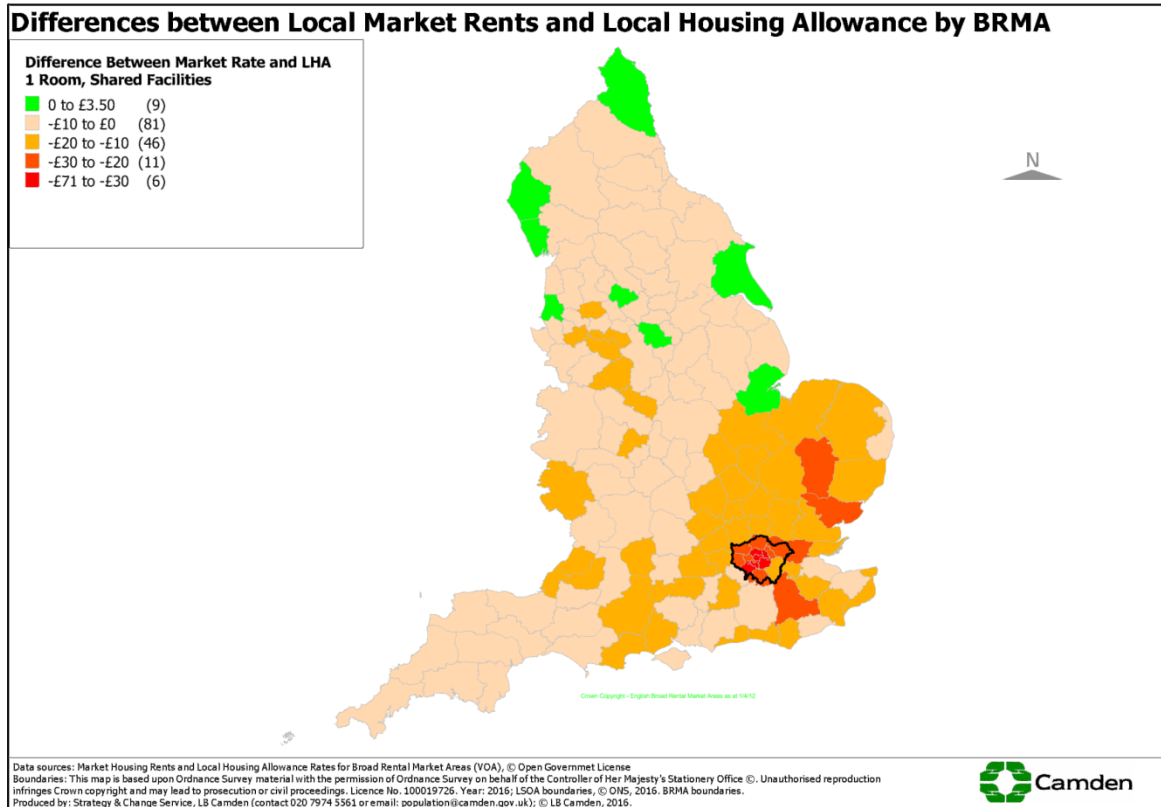
6.2 The affordability challenge

Rents in inner London, outer London and surrounding areas continue to rise while the Local Housing Allowance remains static, and for the majority of families benefits will reduce as a result of the reduction of the Total Benefit Cap to £23,000. Initial calculations indicate that even the smallest families (1 adult and 1 child in a two bedroom home) will be impacted. These pressures will require the Council to seek more sustainable accommodation for these families further outside the borough. The following affordability maps demonstrate affordability of accommodation of different sizes. For larger families, very few properties will be affordable in London.

6.3 Affordability Maps

Mapping the Local Housing Allowance against market rents shows that whilst central London is unaffordable for accommodation of any size, there are

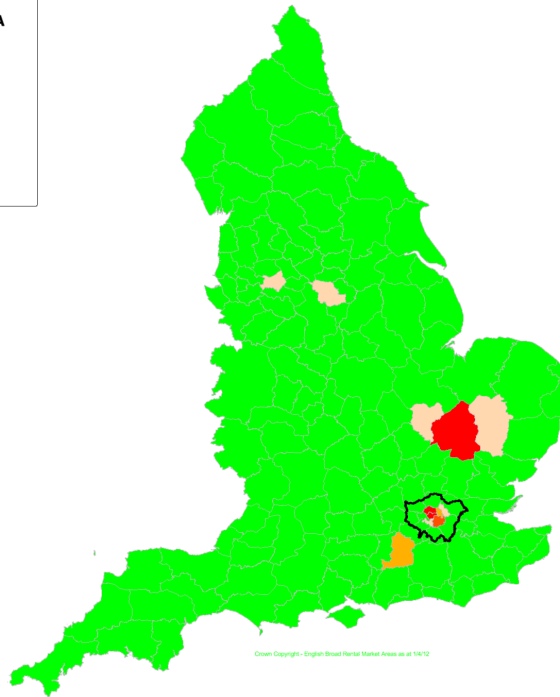
areas outside of central London where market rents are comparable to the LHA. It is important to note however that these maps do not factor in Total Benefit Cap. For families of certain sizes, the new £23,000 cap will render LHA levels unaffordable.



Differences between Local Market Rents and Local Housing Allowance by BRMA

Difference Between Market Rate and LHA 2 Rooms

£0 to £27	(141)
-£10 to £0	(6)
-£20 to -£10	(2)
-£30 to -£20	(1)
-£143 to -£30	(3)



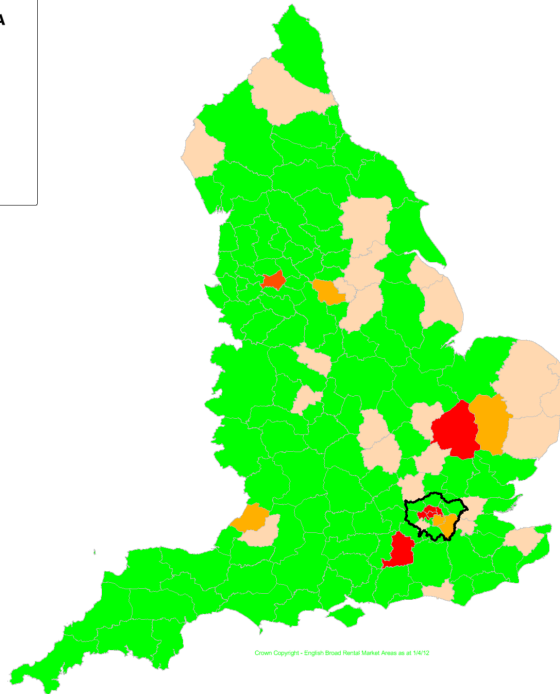
Data sources: Market Housing Rents and Local Housing Allowance Rates for Broad Rental Market Areas (VOA), © Open Government License
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Differences between Local Market Rents and Local Housing Allowance by BRMA

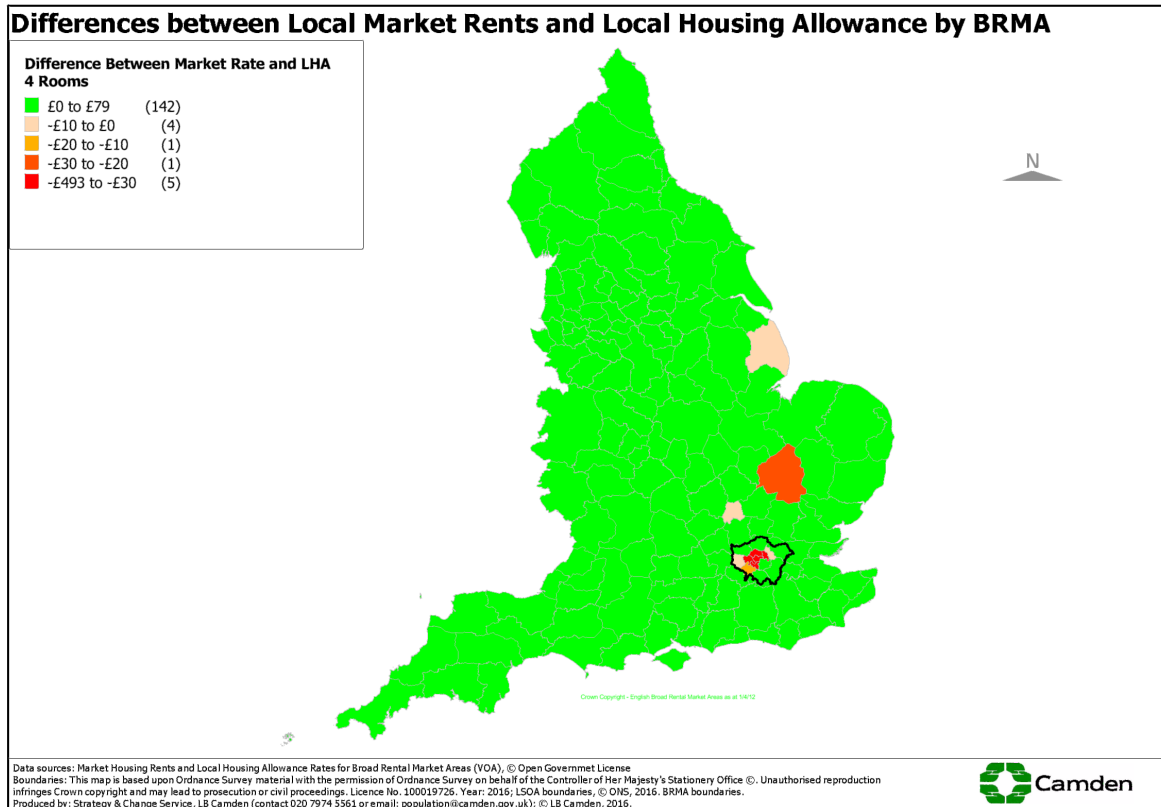
Difference Between Market Rate and LHA 3 Rooms

£0 to +£25	(117)
-£10 to £0	(24)
-£20 to -£10	(5)
-£30 to -£20	(1)
-£286 to -£30	(6)



Data sources: Market Housing Rents and Local Housing Allowance Rates for Broad Rental Market Areas (VOA), © Open Government License
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6.4 When procuring accommodation in the private sector, priority will be given to families seeking to prevent their homelessness. The next priority will be given to homeless families who are waiting in temporary accommodation for the Council to formally discharge its housing duty. Filling accommodation procured in the private sector is often time-critical with landlords wanting to minimise lost rents due to voids and therefore this constraint will also be taken into consideration when deciding which household should receive the offer of accommodation. A full placement policy is appended to the strategy.

7 TARGETS

7.1 This strategy is linked to the following service targets:

- To continue to achieve a homelessness prevention rate of 85%.
- To minimise the amount of time families spend in temporary accommodation prior to the Council discharging its housing duty
- To reduce the numbers of families in temporary accommodation below 300
- A minimum of 200 people making a positive move out of the Adult Pathway each year.

8. TEMPORARY ACCOMMODATION COSTS

8.1 The cost to the Council of Temporary Accommodation falls broadly into two categories.

- The cost of procuring Temporary Accommodation
- The cost of running Temporary Accommodation service and supporting tenancy sustainment amongst residents

8.2 There are two broad types of procurement. Long term procurement where the Council has either bought or taken a long lease on accommodation, usually a hostel and short term accommodation procured on a night-by-night basis such as Annexes and Bed and Breakfast.

8.3 The cost of administering and running the temporary accommodation service relates mainly to staffing costs and the cost of utilities in the hostels. The level of rent chargeable to households in temporary accommodation is in effect capped by the level of housing benefit that clients are able to claim. The rental income received from is not enough to cover the full cost procuring and managing temporary accommodation and so the Council invests some of its resources into funding the Temporary Accommodation service. The cost of hostels is largely fixed and difficult to reduce as they are procured on long leases that can only be broken at specific points in the leases.

8.4 Temporary Accommodation procured on a night-by-night basis such as Annexes and Bed & Breakfast accommodation represents variable costs that can be reduced as soon as the accommodation is no longer needed. The net direct cost of these properties is the difference between the cost of procurement and the rental charge to the client.

8.5 In 2015/16 the Council's overall investment in Temporary Accommodation was £3.3million. In addition the Council invested £3.4million in homelessness prevention services:

Cost of Homeless Prevention Services	Net Budget £000
Allocations Service	822
Housing Options Service	757
Floating Support	849
Private rented sector initiatives	979
Total	<u>3,407</u>

8.6 As part of the Council's medium term financial strategy the investment in the cost of temporary accommodation and homelessness prevention was reduced by £800,000 from 2014/15 to 2015/16 and will reduce by £2.5 million by 2017/18.

8.7 In order to reduce the cost of temporary accommodation the Council is looking at the reducing the usage and cost of each different type of temporary accommodation.

Hostels

The cost of hostels is largely fixed and semi-fixed costs such as the lease on the building and the cost of staff and utilities. In the short term the Council will aim to ensure the hostels are as cost effective as possible by reviewing running costs to ensure the hostels are being run as efficiently as possible and minimising the level of voids. Each hostel unit yields an average of £15,000 per annum in rent and service charge income. Ensuring that void units are managed and re-let efficiently will maximise income and help offset the running costs of the service. In the medium term the Council will continue to seek to reduce the number of hostels needed by reducing the number of homeless households. This will allow the Council to terminate leases when they come to an end or when a suitable break clause can be activated.

Annexes and Bed and Breakfast

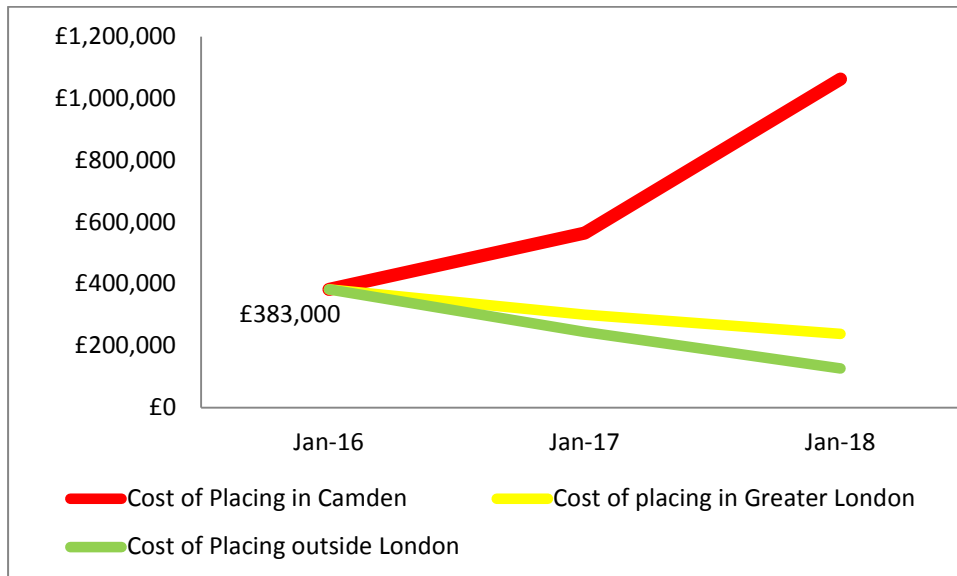
The cost of annexes are largely variable. The Council only procures Annexes when they are required and they are only purchased on a night-by-night basis. In January 2016 the council was using 206 annexes and bed and breakfast hotels as temporary accommodation at an overall net cost of approximately £7,350 per week or £402,000 per annum (Procurement Cost minus Rental Income). The average net unit cost of each separate Annex varies from £0 per week to £200. In order to reduce the cost of annexes the Council will seek to:

- (a) Reduce the number of annexes by making best use of the Council's hostel accommodation, finding better solutions for existing homeless households and reducing the number of new households that require temporary accommodation.
- (b) Reduce the unit cost of annexes that the council does need to procure. This may require the Council to procure annexes outside of London to take advantage of lower procurement costs.

The net cost of annexes is driven by both the size and location of each annex. If the council is successful in preventing homelessness by identifying suitable private rented accommodation then it is expected that the need for temporary accommodation could continue to fall and the number of annexes required could fall by approximately half over the next two years. There would still be a requirement for the council to procure around 50 new annexes each year, for temporary accommodation purposes. The Council could either;

- (a) Continue to follow a policy of procuring annexes form within greater London
- (b) Only procure new annexes within Camden
- (c) Look to procure annexes outside of Greater London

The graph below shows the expected net cost of Annexes following different strategies if the use of annexes reduces over the next two year as expected.



NB: The graph shows the net cost of procurement (Procurement cost – Rental Income) and excludes the cost of bad debts, housing benefit subsidy or management of the annexes

Leased Accommodation

Leased temporary accommodation is managed by a third party, usually a housing association. The cost to the council is a weekly management fee. These schemes are time limited and as they come to an end the council is not renewing them. This will allow officers to procure more cost effective forms of temporary accommodation or help clients to move into the private rented sector.

Homeless Prevention

The Council will continue to invest in homeless prevention in order meet the strategic goal of reducing the number of homeless households and to save the cost of procuring additional temporary accommodation.

8.8 Financial Risks

The government has announced a number of measures designed to reduce the cost of welfare provision. Some of the measures will reduce the level of housing benefit payable to clients in temporary accommodation such as freezing LHA rates for the next four years and the introduction of caps on the total amount of benefit that can be paid any household. This will mean that

the income available to the council via rental income for temporary accommodation is likely to reduce over the medium term. The Council will seek to mitigate this risk by continuing to work to reduce the numbers in Temporary Accommodation. Fewer households in temporary accommodation will result in a lesser impact of any reduction in income from individual households.

The use of temporary accommodation is demand led and the Council has a duty to provide temporary accommodation where a household is judged to be statutory homeless. This could lead to an increase in the need for temporary accommodation to meet this statutory demand. The Council seeks to mitigate this risk by continuing to invest in homeless prevention.

9 REVIEW OF STRATEGY

This strategy will be reviewed in 2019 and monitored over its life. Further welfare changes, significant changes to local government finances, or homelessness need, may require a review of this strategy prior to this date.

Placement Policy: Allocation of Temporary Accommodation, Accommodation to Prevent Homelessness and Discharge of Duty

This Placement Policy accompanies the Homelessness Accommodation Strategy and should not be read or referenced in isolation. It also sits alongside a working protocol relating to households with children who are found to be intentionally homeless or are otherwise not owed a homelessness duty from Camden.

The council currently procures accommodation to meet a range of housing needs:

- Temporary accommodation for households accepted as homeless or those waiting for a homelessness decision.
- Accommodation in the private rented sector to prevent homelessness.
- Accommodation in the private rented sector to discharge the council's duty under the Localism Act 2011.

Allocation of Social Housing Tenancies

The Council's new allocations scheme sets out the priorities for social housing in Camden. Social housing tenancies are not routinely used to house homeless households either temporarily or permanently as the demand for social housing tenancies far outstrips supply in Camden. The new allocation scheme grants priority to families engaging with the Council to prevent their homelessness and awards a further 100 points to households where homelessness has been prevented for a period of six months.

The Floating Support Service works with families in Temporary Accommodation and assisted bidding is offered where appropriate to ensure that all that are eligible are able to access the council's housing allocation scheme.

Priorities for private sector accommodation

When procuring accommodation in the private sector, priority will generally be given to homelessness prevention cases in line with the Council's priorities to work with households to prevent statutory homelessness. The homelessness prevention approach is aimed at reducing the need to place households in temporary accommodation and instead moving them on to settled accommodation to meet their housing need. The approach means that families should spend little or no time in temporary accommodation and will not face repeated moves and the disruptions that that involves. It also minimises the amount of temporary accommodation the council has to provide.

The offer of private rented properties to applicants threatened with homelessness is a voluntary option and where they have refused a maximum of 3 reasonable offers (one offer within Camden borough may be considered sufficient) they will be given the option of making a statutory homeless application, in which case if they do apply and the main duty is accepted they will normally then receive one Private Rented Sector Offer to end the duty.

Where a household applies as homeless (after the council adopted the power held in the Localism Act 2011 to end the main duty with an offer of a suitable private sector tenancy) then the main housing duty, if accepted, will usually be ended with one private rented suitable offer (the “PRSO”). We will generally look to offer PRS supply to prevention cases ahead of discharge cases but a decision will be made on a case by case basis, with the priority being to ensure a successful letting.

All accommodation in the private sector must comply with basic minimum standards:

- Physical standards. Checks will be completed to ensure that electrical and gas equipment is safe and a fire risk assessment will be carried out. Properties will have an Energy Performance Certificate and a valid Gas Safety Certificate. Where feasible, properties will be pre-inspected to ensure they meet minimum standards and are safe
- Good management and the role of the landlord. Landlords will be expected to demonstrate that they are a ‘fit and proper landlord’ (for example through membership of a landlord accreditation scheme) and provide a written tenancy agreement.

When deciding if a property is suitable for a particular household, the following factors will be taken into consideration.

- Affordability. Where a household is claiming housing benefit, we look for properties that meet a household’s bed need that are in areas where the LHA rent is affordable. In the current climate of rising rents, such properties are likely to be out of borough, and increasingly out of London, particularly for larger properties. We will consider a household’s income and their ability to meet any shortfall between the housing benefit paid and the rent. In some cases, such as when being housed temporarily, households may be eligible for a discretionary housing payment (DHP). However, DHP will only be considered as a short-term ‘stop-gap’ and not as a long-term solution for housing affordability. Ensuring that accommodation is affordable is central to the success and sustainability of our strategy.
- Location. Where accommodation is procured outside of Camden, we will consider the distance of the property from Camden and how the location of the property affects family members. This includes, as far as possible, the impact of location on the factors listed below. Where we make placements outside of the borough, we will notify the Local Housing Authority as required by the Housing Act 2008 (part VII section 208).
- Services, amenities and transport. We will consider the proximity and accessibility of the accommodation to local services, amenities and transport.
- Employment. The type and hours of employment will be taken into consideration alongside the cost and ease of any potential commute. The possibility of taking up new employment will also be considered.

- Children. In accordance with section 11 of the Children Act 2004 we will consider the needs of any children in the household and how to safeguard and promote those needs.
- Education. The age and stage of education of children will be taken into account, including any public examinations the children will be taking. The cost (particularly for over 16s where travel costs will be incurred) and ease and distance of any potential commute to existing schools will be considered along with the possibility of relocating to schools closer to the property offered. Support provided to any children with special educational needs will also be taken into consideration. Children of primary school age may need to move to schools closer to their new home.
- Childcare and other caring responsibilities. Existing childcare arrangements are considered as well as any other caring responsibilities, including the nature of the care provided, and the feasibility of maintaining these or making other arrangements.
- Medical and health issues. Any medical or health needs will be taken into account, including any current ongoing treatment and support and the possibility of transferring to new healthcare providers closer to the property. Where a household needs accessible accommodation, this will be taken into account.
- Family and community support. As far as possible, family support and community links will be taken into consideration. Where there is social worker involvement with a family, they will be involved in any discussions about moving the family to alternative accommodation to ensure their needs can be met.
- Families in need Priority for properties in or accessible to Camden will be given to families in need. This is in accordance with Camden's duties under Section 11 of the Children's Act 2004. Equally, for families not owed a housing duty by Camden but with dependent children, the council will ensure that the needs and welfare of children are safeguarded. Families prioritised as 'in need' include:
 - Households where children are at risk or may be significantly disadvantaged, including households giving or receiving care, care leavers, children on the Child Protection Register, children at a significant educational milestone.
 - Households with at least one family member who has a severe disability or significant health condition – for example,
 - a person with severe and enduring mental health problems who is receiving psychiatric treatment and aftercare (provided by local community health services) and has an established support network where a transfer of care would severely impact on their ability to engage with treatment or care plans.

- A person suffering from a life threatening illness or a severe disability receiving regular (at least fortnightly) treatment under the care of a hospital in the borough.
- A person in receipt of a significant care package (provided or sponsored by the Director of Housing and Adult Social Care) which cannot be transferred.
- Households where there is a risk to be managed – for example, those with a history of anti-social behaviour, prolific and persistent offenders, those housed through MAPPA etc.

Households with children known to Family Services and Social Work as Children in Need who accept housing out of borough will be transferred to the appropriate new-borough support service. The new local authority's children service will be notified by Camden and a period of joint working will ensure the needs and welfare of the children are safeguarded.

For most families it is unlikely that accommodation will be in Camden due to limited availability and affordability. Whenever possible, suitable accommodation will be sought in areas easily accessible to Camden.

Bedroom need

The following household members are expected to share a bedroom:

- adult couples
- 2 children aged under 16 of the same sex
- 2 children aged under 10 regardless of sex.

The following household members are entitled to their own room:

- a single adult (aged 16 or over)
- a child that would normally share but shared bedrooms are already taken, for example if the household has 3 children and 2 already share
- children who cannot share because of a disability or medical condition

We will offer couples & lone parents with a single child of less than 3 years at the start of the placement a one bedroom property where the overall size of the accommodation is sufficient for the needs of 1 or 2 adults and one child.

How PRS accommodation will be allocated

When a property is made available, suitable applicants will be identified. Allocating accommodation procured in the private sector is often time-critical as landlords want to minimise lost rents due to void periods and we need to limit the risk of the property being let elsewhere. Due to the short time frames involved in the allocation of private sector properties, potential applicants will be contacted directly by the Council to

arrange a viewing. Where an applicant cannot be contacted another potential applicant will be contacted.

Where accommodation is for a homelessness prevention case, up to three households may be selected to attend a viewing. For discharge of duty cases, one applicant will view the property.

The final decision to accept or reject a household will usually rest with the landlord. If the landlord refuses a nominated household, the offer will be withdrawn and a further offer will be made when a suitable property becomes available.

If an applicant working with the council to prevent their homelessness refuses a maximum of three suitable private sector offers, we will offer to make a statutory homelessness assessment, which could result in a final discharge of duty offer. If an applicant refuses the discharge of duty offer, this can result in the council ending its homelessness duty to that applicant.

When making a discharge of duty offer, a snapshot of approved and available accommodation will be taken from the Housing Needs Group or equivalent database.

Once both the applicant and landlord accept, an assured shorthold tenancy with a minimum fixed term of 12 months will be given.

Prioritising households awaiting a discharge of duty for available PRS properties

The decision about which household to make an offer of private rented accommodation to, as discharge of the S193 homelessness duty, will take into account a range of circumstances, which will depend on the individual circumstances of the applicant, including:

- a. The cost of the existing temporary accommodation to the council
- b. The suitability of the applicant's current temporary accommodation, including affordability.
- c. The likely availability of alternative social housing
- d. Time in Temporary Accommodation (with those who have been in TA longer taking priority)

Priority for housing locally

All properties provided to be used for Private rented sector offers will be zoned as follows:

- Zone A1 – located in the London Borough of Camden
- Zone A2 – located in a nearby borough (e.g. Brent, Barnet, Enfield, Haringey, Hackney, Islington, Newham, Southwark, Westminster, Waltham Forest)

- Zone B – located in another London borough
- Zone C – located near to London (within 50 miles, including the Home Counties)
- Zone D- located beyond zone C

Applicants will be individually assessed prior to any offer to determine the type and location of accommodation that should be offered. The needs of the household will be recorded in full along with any action to mitigate disruption. A snap shot of available properties will be taken from the Housing Needs Database of properties (HNG) or equivalent.

Households that have a relatively low level of need are more likely to be offered accommodation in zones B, C and D. However, even if a household is considered to have a lower level of need, they could be allocated available units in Zone A1, A2 or Zone B if these units are not suitable for higher priority households.

Before an offer of PRSO accommodation is made, an affordability assessment will be carried out to ensure that the offer is suitable for the household. This will take into account local LHA levels and the applicant’s current and likely future circumstances. Households in receipt of welfare benefits may be subject to restrictions on the amount of benefit they can receive, which may affect their ability to pay rent. Offers of accommodation in Camden or nearby boroughs are subject to suitable accommodation being available and the applicant being able to afford accommodation in these areas.

The placement summary grid below is for guidance to help officer decide on whether a property is suitable for an individual household. It will also depend on the availability of property. The individual circumstances of each household will be taken into account when determining the suitability of a PRSO.

Placement Summary Grid:

Property Zone	Household Description
A1	<ul style="list-style-type: none"> • households with at least one child registered on the Child Protection Register in Camden • households where Camden’s Social Services has serious concerns about one or more children and is working intensively with the household • households with one child (or more) who has a Statement of Special Educational Needs, which could not be provided by another LA or where the move would be seriously detrimental to the child’s wellbeing. • households with an applicant who has severe and enduring mental health problems who is receiving psychiatric treatment and aftercare provided by local community health services and has an established support network where a

	<p>transfer of care would severely impact on their ability to engage with treatment and care plans</p> <ul style="list-style-type: none"> • households where at least one member is in receipt of a significant care package provided or sponsored by Camden's Social Services which cannot be transferred • Households where there is a risk to be managed such as those with a history of anti-social behaviour, prolific and persistent offenders and those housed through MAPPA and other projects
A 2	<ul style="list-style-type: none"> • households with one child (or more) in secondary school in their final year of Key Stage 4 (generally Year 11) • households where at least one member is suffering from a life threatening illness, or is severely disabled and is receiving regular (at least fortnightly) treatment at a hospital in Camden • Care leavers moving on in accordance with the councils pathway plan • Households where one person (or more) is in permanent and settled employment in or near to Camden and this employment will be lost should the member be unable to commute to their place of work. • Households receiving care, which would be disrupted or cease if the registered care provider is unable to commute to fulfil their caring duties • Households where a member of the household is caring for another person in the borough who falls into one of the following categories and they would be unable to commute to meet their caring duties: <ul style="list-style-type: none"> i. Over 75 years old and living alone, or with no other member of the household under 75 years of age, OR iii. In receipt of the medium or higher rate of the care component or the higher rate of the mobility component of the Disability Living Allowance, Attendance Allowance or War Disablement pension
B	<ul style="list-style-type: none"> • Household with one or more child in secondary school or further education college in Camden or neighbouring borough (other than those in the final year of Key stage 4 - see Group A above). This group will be prioritised for housing within reasonable commuting distance of the school or college. • Households where one person (or more) is in permanent and

	<p>settled employment and this employment will be lost should the member be unable to commute to their place of work. This group will be prioritised for housing within reasonable commuting distance of their workplace.</p> <ul style="list-style-type: none"> Households where one person (or more) is receiving medical treatment that can only be provided by a specific medical facility: this group will be prioritised for housing within reasonable commuting distance to the medical facility
C	<ul style="list-style-type: none"> Households not falling within A and B above where one person (or more) has a need to be within reasonable commuting distance to London
D	<ul style="list-style-type: none"> All other homeless households will be offered private rented sector accommodation wherever the borough is able to procure it

In the event of multiple households having equal priority for a particular property the urgency of the family's need to move, including the suitability, continued availability of and length of time spent in their temporary accommodation will be taken into consideration. In the case of homelessness prevention, those households where placement prevents the need for temporary accommodation will be prioritised.

It is forecast that placements may be made by in each zone in the following proportions, though this data must be treated with caution as this will depend on the outcome of many factors that will affect supply and demand:

Zone	Placement %
Zone A 1	5
Zone A2	40
Zone B	40
Zone C	10-15
Zone D	0-5

How temporary accommodation is allocated

Based on data since April 2013 we can anticipate needing to place around 70 households into temporary accommodation in 2016/17. We can also anticipate needing to transfer around 130 placed households from one TA placement to another, for reasons such as household composition changes, changing medical needs, risk of violence and so on.

Temporary accommodation is usually allocated on the day the family will need it. The same factors in deciding what accommodation will be offered will be taken into account as is the case for sourcing/procuring privately rented accommodation, though we secure our supply through different procurement methods.

Where a Camden hostel is not suitable due to the household size or medical circumstances or a hostel would be suitable but is not available, annexe accommodation will be procured. Once accommodation has been identified, the family will be given an offer letter and a note of their responsibilities whilst living in the temporary accommodation. In placing families in annexe accommodation the Council will take account, as is reasonably practical, of the placement grid (A-D) above in deciding which families to select for accommodation in, or at various distances from, Camden.

If annexe accommodation is found, the applicant will meet the provider at the property and they will be shown the utility meters etc. These properties will be furnished with a cooker, fridge, table and chairs, sofa and beds. For hostel accommodation, the family will be sent to the hostel and where they will complete the necessary paperwork with the Customer Services Officer.

Communication

Households approaching the Council due to homelessness or the threat of homelessness are informed, in writing, of the options available to them. The Council encourages families threatened with homelessness to work with the council to prevent their homelessness in favour of making a statutory homelessness application.

Households are informed of any housing duty owed to them and any decision to house them in temporary accommodation in writing. Any offer of an out of borough accommodation will include a copy of the households 'Suitability and Disruption form.' This form considers the individual circumstances of the household in relation to the property being offered to them and any necessary mitigation to its suitability.

Reviews

Applicants placed in temporary accommodation pursuant to the main housing duty have a right of review in relation to suitability under Section 202 of the Act.

Applicants can also request a review within 21 days of receiving their offer of private rented sector accommodation which has been assessed as suitable by the local authority under Housing Act 1996 Part VII. The review will be carried out by an officer who has not been involved in the original decision who is senior in grade to the decision-making officer.