

NOTICE OF MEETING

Meeting: HOUSING OVERVIEW AND SCRUTINY PANEL

Date and Time: WEDNESDAY, 20 MARCH 2019, AT 6.00 PM*

Place: THE BRADBURY ROOM, APPLETREE COURT,
LYNDHURST

Telephone enquiries to: Lyndhurst (023) 8028 5000
023 8028 5588 - Ask for Karen Wardle
Email: karen.wardle@nfdc.gov.uk

PUBLIC PARTICIPATION:

*Members of the public may speak in accordance with the Council's public participation scheme:

- (a) immediately before the meeting starts, on items within the Panel's terms of reference which are not on the public agenda; and/or
 - (b) on individual items on the public agenda, when the Chairman calls that item.
- Speeches may not exceed three minutes. Anyone wishing to speak should contact the name and number shown above.

Bob Jackson
Chief Executive

Appletree Court, Lyndhurst, Hampshire. SO43 7PA
www.newforest.gov.uk

This Agenda is also available on audio tape, in Braille, large print and digital format

AGENDA

Apologies

1. MINUTES

To confirm the minutes of the meeting held on 16 January 2019 as a correct record.

2. DECLARATIONS OF INTEREST

To note any declarations of interest made by members in connection with an agenda item. The nature of the interest must also be specified.

Members are asked to discuss any possible interests with Democratic Services prior to the meeting.

3. PUBLIC PARTICIPATION

To note any issues raised during the public participation period.

4. FIRE SAFETY POLICY FOR HOUSING (LANDLORD SERVICES) (Pages 1 - 42)

To consider the new draft Fire Safety Policy for Housing (Landlord Services).

5. PROPOSED HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2019-2023 - OUTCOME OF CONSULTATION (Pages 43 - 74)

To consider the consultation responses following public consultation on the proposed draft Homelessness and Rough Sleeping Strategy 2019-2023 and make recommendations to Cabinet and Council.

6. PROPOSED HOUSING ALLOCATION POLICY - OUTCOME OF CONSULTATION (Pages 75 - 106)

To consider the consultation responses following public consultation on the proposed draft Housing Allocation Policy and make recommendations to Cabinet and Council.

7. UPDATE ON THE COUNCIL'S APPROACH TO PRIVATE SECTOR HOUSING

To receive an oral update on the Council's approach to Private Sector Housing.

8. HOUSING STRATEGY / HRA AFFORDABLE HOUSING DEVELOPMENT AND ACQUISITION PROGRAMME UPDATE

To receive an oral update on the progress of the Housing Strategy / HRA affordable housing development and acquisition programme.

9. PORTFOLIO HOLDER UPDATE

An opportunity for the Portfolio Holder to provide an update to the Panel on any issues.

10. WORK PROGRAMME (Pages 107 - 108)

To consider the Panel's future work programme, and make changes where necessary.

11. ANY OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE URGENT

To:	Councillors	Councillors
	S P Davies (Chairman)	N S Penman
	D M S Poole (Vice-Chairman)	Miss A Sevier
	Mrs L D Cerasoli	M A Steele
	Ms K V Crisell	Mrs C V Ward
	Mrs P J Lovelace	Mrs P A Wyeth

HOUSING OVERVIEW AND SCRUTINY PANEL – 20 MARCH 2019

FIRE SAFETY POLICY FOR HOUSING (LANDLORD SERVICES)

1. INTRODUCTION

- 1.1 In November 2018 the Cabinet approved the Council's overarching Fire Safety Strategy - <http://modern:9070/ieListDocuments.aspx?CId=133&MId=6561&Ver=4>. This recognised that the Council discharges a diverse range of statutory functions and controls a number of different buildings, all of which require consideration from a fire safety perspective to ensure that those visiting, working or living in such buildings are adequately protected from the risk of fire.
- 1.2 The overarching Fire Safety Strategy proposed that all Services covering the Council's offices, depots, leisure centres and housing stock have their own fire safety policies detailing bespoke arrangements for fire safety across each of these areas.
- 1.2 This report deals with fire safety measures in the Council's Housing stock and recommends a new Fire Safety Policy for Housing (Landlord Services). The new proposed Policy is attached at Appendix 1.

2. BACKGROUND

- 2.1 Currently, responsibility for fire safety measures relating to the Council's housing stock is spread across a number of different parts of the Council. For example, Fire Risk Assessments are managed by the Corporate Facilities' Team and actions arising are dealt with by the Housing Section.
- 2.2 It is considered that it would be more efficient and effective for Housing Services to be in control of all fire safety measures for Housing stock with appropriate dedicated resources to ensure that the Council's responsibilities are carried out to a high standard.
- 2.3 A thorough review of fire safety measures has been undertaken by Housing Management who have worked closely with Hampshire Fire and Rescue Services in devising the new Fire Safety Policy for Housing (Landlord Services).

3. THE NEW FIRE SAFETY POLICY FOR HOUSING (LANDLORD SERVICES)

- 3.1 The new Fire Safety Policy sufficiently addresses the fire risk within Housing specific properties, and is structured to go over and above current legislative requirements.
- 3.2 The Policy's salient points are as follows:-
 - (a) Clearly identifying legislative and regulatory duties
 - (b) Clear definition of roles and responsibilities
 - (c) Enhanced training for all staff
 - (d) Incorporation of a dedicated Fire Safety Officer
 - (e) Enhance schedule of Fire Risk Assessments (increased frequency and extending to include accommodation as well as communal areas)
 - (f) Information for tenants
 - (g) Close working with Hampshire Fire and Rescue Service
 - (h) Clear responsibilities for 3rd party extra care staff

4. CONCLUSIONS

- 4.1 This Fire Safety policy supports NFDCs commitment to enhancing its fire strategy by being specific to Housing Landlord services and goes over and above the statutory legislative requirements, and clearly defines roles and responsibilities.
- 4.2 It is intended that the new Fire Safety Policy for Housing Services is implemented on 1 April 2019, following sign off by the Portfolio Holder for Housing Services.

5. FINANCIAL IMPLICATIONS

- 5.1 Extra resources of £60,000 were approved by the Cabinet in November 2018 (when approving the overarching Fire Safety Strategy) to deal with enhanced fire safety measures within Housing Services.

6. CRIME & DISORDER IMPLICATIONS

- 6.1 There are none.

7. ENVIRONMENTAL IMPLICATIONS

- 7.1 There are none.

8. RECOMMENDATIONS

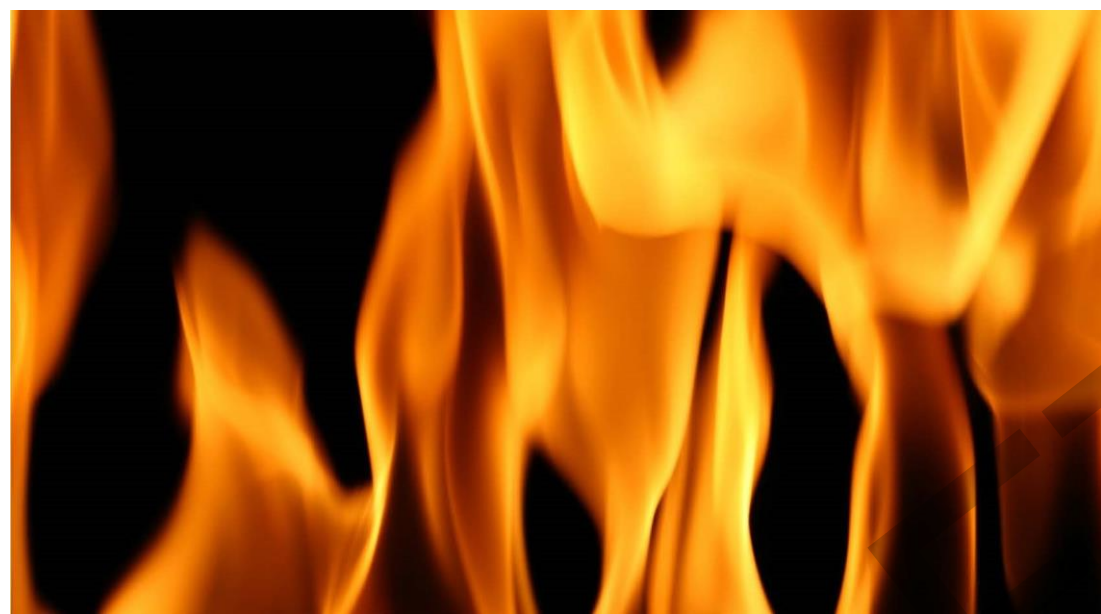
- 8.1 That the Housing Overview and Scrutiny Panel consider the proposed Fire Safety Policy and make recommendations to the Portfolio Holder for Housing Services.

For further information contact:

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richard.fudge@nfdc.gov.uk

Background Papers:

Public documents.



**Housing
Landlord Services
Fire Safety Policy
2019**

DOCUMENT HISTORY			
Name of Policy:	Housing Landlord Services Fire Safety Policy 2019		
Purpose of Policy:	<p>New Forest District Council is committed to its legal and moral obligations in accordance with The Regulatory Reform (Fire Safety) Order 2005 and The Housing Act 2004 and will strive to reduce the risk of fire to as low a level as is reasonably practicable.</p> <p>This policy supports the Council's overarching Corporate Fire Strategy and sets out the guiding principles and arrangements for Housing Landlord Services.</p>		
Policy Applies to:	This policy and the subsequent arrangements apply to all directly and indirectly employed housing staff within New Forest District Council and, where appropriate, tenants, contractors, care providers and members of the public.		
First Issued:	1 st April 2019		
Reviewed:	At least every 2 years from date of issue or as a result of legislative, organisational changes or an incident investigation.		
Version History	<table border="1"> <tr> <td>V1</td> <td>January 2019</td> </tr> </table>	V1	January 2019
V1	January 2019		

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Section 1 Introduction

New Forest District Council is committed to fire safety obligations within its housing stock and will strive to reduce the risk of fire to as low a level as is reasonably practicable. This policy sets out the guiding principles and arrangements with regard to fire safety and fire risk management to achieve and maintain full compliance with its duties under The Regulatory Reform (Fire Safety) Order 2005 and The Housing Act 2004.

This Fire Safety Policy complements the Corporate Fire Safety Strategy produced by New Forest District Council.

Section 2 Legislative and Regulatory Context

There is significant legislation and regulation around the prevention of fire in residential buildings that has developed over the years mainly in response to various incidents and tragedies that have occurred.

The Regulatory Reform (Fire Safety) Order 2005

The Regulatory Reform (Fire Safety) Order 2005 (known as Fire Safety Order) applies to England and Wales. It covers 'general fire precautions' and other fire safety duties that are needed to protect 'Relevant Persons' in case of fire. The Order requires fire precautions to be put in place 'where necessary' and to the extent that it is reasonable and practicable in the circumstances of the case. Responsibility for complying with the Fire Safety Order rests with the 'Responsible Person'.

- a) The Fire Safety Order is a fire risk assessment based approach where the responsible person(s) for the premises must decide how to address the risks identified, while meeting certain basic requirements;
- b) By adopting a fire risk assessment approach, the responsible person(s) will need to look at how to prevent fire from occurring in the first place, by removing or reducing hazards and risks (ignition sources) and then look at the precautions to ensure that people are adequately protected, if a fire were still to occur;
- c) The fire risk assessment must also take into consideration the effect a fire may have on anyone in or around your premises plus neighbouring property and will need to be kept under regular review. The fire risk assessment concentrates on the following areas:
 - Elimination or reduction of risks (ignition sources);
 - Suitable means of detecting & raising the alarm in the event of fire;
 - Adequate emergency escape routes and exits;
 - Adequate fire compartmentation (fire & smoke spread and the protection of escape routes);
 - The appropriate type and sufficient quantities of fire extinguishers for staff use within staff managed accommodation;
 - Correct type and sufficient quantities of fire signs and notices;
 - Provisions for the correct maintenance of installed fire equipment;
 - Suitable provisions for the protection of Fire Brigade personnel;

- To ensure that occupants receive the appropriate instructions & training.

The Housing Act 2004, which introduced the Housing Health and Safety Rating System (HHSRS)

The Housing Act 2004 introduced the housing health and safety rating system (HHSRS). The HHSRS is a risk based evaluation tool used to assess potential risks and hazards to the health and safety of occupants from deficiencies identified in residential properties in England and Wales.

- a) The assessment method focuses on the hazards that are present in housing and tackling these making housing healthier and safer to live in;
- b) The assessment covers 29 categories of hazard which includes the threat of uncontrolled fire and smoke.

Other Legislation, Approved Codes of Practice and Guidance Notes

Other legislation, approved codes of practice and guidance notes relating to Fire Precaution but which is not exhaustive:

Legislation

- a) Building Regulations 2010: Approved Document Part B: (Fire Safety) Volume 1: dwelling houses;
- b) Building Regulations 2010: Approved Document Part B: (Fire Safety) Volume 2: buildings other than dwelling houses (2006 edition incorporating the 2010 and 2013 amendments)
- c) Gas Safety (Installation and Use) (Amendment) Regulations 2018
- d) BS 7671:2018 Requirements for Electrical Installations – IET Wiring Regulations (18th Edition)
- e) Electrical Equipment (Safety) Regulations 2016
- f) Furniture and Furnishings (Fire Safety) Regulations 1998;
- g) The Health and Safety at Work Act 1974, particularly Section 3: - General duties of Employers and Self-employed persons other than their employees.

Approved Codes of Practices

- a) Fire Safety Risk Assessment – Sleeping Accommodation;
- b) Fire Safety Risk Assessment – Small and Medium Places of Assembly

Guidance Notes

- a) Regulatory Reform (Fire Safety) Order 2005 Guidance Note No. 1: Enforcement Chief Fire Officers Association;

- b) Collected Perceived Insights into and Application of The Regulatory Reform (Fire Safety) Order 2005 for the Benefit of Enforcing Authorities. Chief Fire Officers Association;
- c) National Fire Safety Protocol. LACORS;
- d) Fire Safety in Purpose-built Blocks of Flats. Communities and Local Government;
- e) Fire Safety in Housing. Chartered Institute of Housing;
- f) Fire Safety in Specialised Housing – National Fire Chiefs Council

Section 3 Definitions

Term	Definition														
Competent Person	<p>Person(s) whilst not required to process specific academic qualifications but:</p> <ul style="list-style-type: none"> a) understand the relevant fire safety legislation; b) have appropriate education, training, knowledge and experience in the principles of fire safety; c) have an understanding of how fire develops and the behaviour of people in fire; d) understand the hazards, risk and other relevant factors with occupants at special risk within the premises; e) if carrying out fire risk assessments, have appropriate training/experience in this field 														
Dedicated Call Centre	Appletree Careline or other contracted 24Hr Call centre.														
Emergency Evacuation Plan	The emergency evacuation plan is a written plan based on the outcome of the fire risk assessment and its purpose is to ensure that all people within the premises know what to do if there is a fire and that the premises can be evacuated safely.														
Fire Alarm Systems	<p>BS 5839-1 defines eight categories of fire alarm system, according to whether the system is purely manual or incorporates automatic fire detection, and, in the latter case, the purpose and extent of the automatic fire detection.</p> <table border="1" style="width: 100%;"> <tr> <td colspan="2">Category M</td> </tr> <tr> <td colspan="2">Manual system therefore incorporating no automatic fire detection.</td> </tr> <tr> <td colspan="2">Category L</td> </tr> <tr> <td colspan="2">Automatic fire detection system intended for the protection of life:</td> </tr> <tr> <td>L1</td> <td>Installed throughout all areas of the building</td> </tr> <tr> <td>L2</td> <td>Installed in areas of the building that satisfy the recommendations for L3 systems with the addition of protection in areas where there is either a high likelihood of a fire starting or a high risk to life in the event of a fire</td> </tr> <tr> <td>L3</td> <td>Designed to give warning of fire at an early enough stage to</td> </tr> </table>	Category M		Manual system therefore incorporating no automatic fire detection.		Category L		Automatic fire detection system intended for the protection of life:		L1	Installed throughout all areas of the building	L2	Installed in areas of the building that satisfy the recommendations for L3 systems with the addition of protection in areas where there is either a high likelihood of a fire starting or a high risk to life in the event of a fire	L3	Designed to give warning of fire at an early enough stage to
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	<p>enable all occupants other than, possibly those in the room of fire origin, to escape safely, before the escape routes are impassable due to the presence of fire, smoke or toxic gases. To satisfy this objective fire detection is installed in all rooms or areas that open on to an escape route</p> <p>L4 Installed within escape routes, including corridors and stairways</p> <p>L5 Installed in specific locations to satisfy a specific fire safety objective</p> <p>Category P Automatic fire detection system intended for the protection of life</p> <p>P1 Installed throughout all areas of the building</p> <p>P2 Installed only in defined parts of the building</p>
Fire Risk Assessment	<p>A formal written document which records the following:</p> <ul style="list-style-type: none"> a) Fire hazards (sources of ignition, fuel and oxygen); b) People at risk (people in and around the premises, and those especially at risk, e.g. those with reduced mobility); c) Evaluate, remove/ reduce fire hazards and protect from significant risk (of fire starting, risk to people from fire, remove/ reduce fire hazards, remove/ reduce risks to people from fire, protect by providing fire precautions – active and passive); d) Record, plan, inform, instruct and train (major findings and action taken, discuss and work with others, prepare an emergency plan, inform and instruct, or training staff); e) Review: review the assessment annually, and make changes as necessary. <p>Abbreviated to FRA.</p>
Hampshire Fire and Rescue Service	<p>Hampshire Fire and Rescue Service is the statutory fire and rescue service for the county of Hampshire.</p> <p>Abbreviated to HFRS</p>
Housing Health and Safety Rating System	<p>The housing health and safety rating system introduced by The Housing Act 2004 is a risk-based evaluation tool to help landlords identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings.</p> <p>Abbreviated to HHSRS</p>
Manual Fire Suppression	<p>Fire Extinguishers: water; foam, carbon monoxide; & powder forms.</p> <p>These extinguishers are used on different fire types, and the primary purpose is to ensure a small fire does not become a large fire. Staff using extinguishers must have received appropriate training and/or instruction</p>
Passive Fire Protection	<p>A key element of passive fire protection in buildings, based on the principles of subdividing a building into fire resistant compartments which can contain or limit the spread of fire, smoke and other dangerous gases, from entering other compartments for a period of time.</p> <p>Abbreviated to PFP</p>
Personal Emergency	<p>The Regulatory Reform (Fire Safety) Order 2005 (where it applies)</p>

Evacuation Plan (PEEP)	<p>requires the responsible person to make provision for the safe evacuation of disabled people and those with impaired mobility in the event of a fire.</p> <p>Abbreviated to PEEP</p>
Regulatory Reform (Fire Safety) Order 2005	<p>The main regulatory legislation which sets standards for the control measures to be taken for fire safety, including the need for all work places to have Fire Risk Assessments undertaken. General measures include:</p> <ul style="list-style-type: none"> a) Reduce the risk of fire occurring on the premises and the risk of fire spread; b) Measures in relation to the means of escape from the premises; c) Measures for assuring that, at all material times, the means of escape can be safely and effectively used; d) Measures in relation to the means of fighting fires; e) Measures in relation to the means for detecting fire on the premises and giving warning in case of fire on the premises; f) Instruction and training of employees, and providing tenants with relevant information. <p>Abbreviated to Fire Safety Order</p>
Relevant Person	<p>Any person, including Responsible and Competent Persons, who are or may be legally on the premises and any person in the immediate vicinity of the premises who is at risk from fire.</p>
Responsible Person	<p>Detailed in the Fire Safety Order, as the person who has responsibility for fire safety matters on site. The Responsible Person is required to ensure that fire risk assessments have been undertaken and the relevant site checks are carried out to the right frequency. Fire Safety management arrangements are likely to be delegated down to an Appointed Officer(s).</p>
'Seek and Search'	<p>The investigation 'Signs of Fire' process to prevent the disruption and the risk posed by false alarms and to ensure the appropriate attendance is sent. General measures include:</p> <ul style="list-style-type: none"> a) Check the fire alarm panel to find where the alarm has activated; b) When investigating look, listen and smell for signs of fire. It might be smoke, unusual noises or heat and could be any one, some, or all of those signs; c) Before opening a door feel it with the back of your hand, as high up the door as you can reach, for signs of heat. If it is hot do not open the door; d) If at any time you discover signs of fire, raise the alarm, get out using the nearest fire exit and call the fire service on 999

Section 4 Roles and Responsibilities

We will ensure that all Council housing staff are fully aware of their role in minimising and preventing the risk of fire.

Chief Executive
<p>Responsibility for complying with the Fire Safety Order rests with the 'responsible person'.</p> <p>The 'responsible person' is the employer and any other person who may have control of any part of the premises. In the case of NFDC the employer is represented by the Chief Executive together with the Executive Heads who collectively form the 'Executive Management Team'.</p>
Executive Head of Governance and Regulation
<p>The Executive Head of Governance and Regulation has overall strategic responsibility for the Council's approach to fire safety in social housing controlled by the Council and is responsible for ensuring that the requirements of the Fire Safety Order and Housing Act 2004 and supporting Regulations are applied and implemented and to nominate one or more persons to act on their behalf to discharge their responsibilities.</p>
Housing Service Managers
<p>The Housing Service Managers will have been delegated responsibility by the Executive Head of Governance and Regulation and are responsible for the overall effectiveness of the Housing Landlord Services Fire Safety Policy in their areas of responsibility.</p>
Maintenance Strategy and Compliance Manager
<p>The Maintenance Strategy and Compliance Manager is responsible for overseeing the day to day management of fire precautions to all Council owned housing stock, reporting directly to Service Manager for Housing Maintenance and Service Manager Housing Estates Management.</p>
Housing Estates and Maintenance Operations Managers
<p>The Housing Estates Manager, Maintenance Operations Manager and Maintenance Operations (Technical) Manager are responsible for the detailed arrangements necessary to manage fire risk within their respective areas of control. Where contractors are being managed and there is likelihood that fire precautions may be affected, regular monitoring is to be included to ensure these precautions are maintained.</p>
Fire Safety Officer
<p>The Fire Safety Officer is responsible for the day to day delivery of fire precautions to all Council owned housing stock, reporting directly to the Maintenance Strategy and Compliance Manager.</p>

A detailed roles, responsibilities and duties table is attached at Appendix 1.

Section 5 Training

All staff involved with fire risk assessment or fire prevention actions will undergo a training needs analysis to identify specific training needs. In consultation with the Corporate Health and Safety team recommendations for suitable training will be presented to the Council's Executive Management Team ensuring that staff are trained to suitable standard.

All front line Housing staff will be required to complete fire safety awareness training which will be refreshed annually. The training will include:

- Requirements of the fire fuel triangle (fuel, oxygen, heat);
- Causes of fire;
- Hazards presented from fire;
- Types of fuel;
- Sources of ignition;
- Fire detection;
- Firefighting equipment;
- Means of escape;
- Emergency procedure (specific arrangements for the location)

Staff with specific duties, such as Housing health and safety rating system (HHSRS) and Fire Risk Assessors, will be trained to undertake these tasks effectively and competently. An initial joint training session for staff of New Forest District Council and Extra Care and Support Provider will be arranged and facilitated by New Forest District Council.

Section 6 Fire Risk Assessment

There are four different fire risk assessment types that can be carried out. The fire risk assessment must be the correct one for the particular type of premises (See Section 7).

The following table outlines a summary of Fire Risk Assessment Types:

Type	Description
Type 1 Common parts only (non-destructive)	Basic fire risk assessment required for the purpose of satisfying the Fire Safety Order.
Type 2 Common parts only (destructive)	The scope and objectives are generally similar to those of a Type 1 fire risk assessment, except that there is a degree of destructive inspection, carried out on a sampling basis. This will usually necessitate the presence of a contractor for the purpose of opening up construction and making good after the inspection.
Type 3 Common parts and flats (non-destructive)	Fire risk assessment includes the work involved in a Type 1 fire risk assessment, but goes beyond the scope of the Fire Safety Order (though not the scope of the Housing Act). This risk assessment considers the arrangements for means of escape and fire detection (i.e. smoke alarms) within at least a

	sample of the flats. Within individual flats, the inspection is non-destructive, but the fire resistance of doors to rooms is considered.
Type 4 Common parts and flats (destructive)	Same scope of work as a Type 3 fire risk assessment, except that there is a degree of destructive inspection, in both the common parts and individual flats, carried out on a sampling basis. This will usually necessitate the presence of a contractor for the purpose of opening up construction and making good after the inspection. However, the nature of the work is such that, often, destructive inspection within flats can only be carried out in those that are vacant.

Section 7 Fire Risk Assessment Schedule

The fire risk assessment schedule is based on the level of risk and likelihood that a fire could start and cause harm to those residing in Council owned housing stock in consideration of key risk factors. An assessment of the risk factors for each building type is the driver which has formed the decision of the type and frequency of which FRA's are to be undertaken to reduce the risk of fire to as low a level as is reasonable practicable.

Risk Factors

- Building type;
- Intended use;
- Persons at risk;
- Activities undertaken

Building Types

The Risk Assessment Schedule varies in terms of building types and for this purpose the following table outlines a summary of the building types within the Council's stock:

TYPE	DESCRIPTION
Hostel	encompasses any building designed for the use of multiple occupation where tenants are allocated a temporary room to live with the need for sharing facilities
Extra Care	encompasses any building between two and four floors with distinct flats where tenants can live without the need for sharing facilities, but require supported living to enable their individual needs to be met
45/60+ General Needs Block	Encompasses any building between two and four floors with distinct flats where tenants can live without the need for sharing facilities, with communal stairways and enclosed corridors. But where allocation is age restricted.
Low/medium rise block	encompasses any building with between two and four floors with distinct flats where tenants can live without the need for sharing facilities, with communal stairways and enclosed corridors.

Community building	encompasses any building designed to hold public community activities
Residential Static Home	encompasses any building that is classified as a residential static caravan in a park environment. Although the structure itself does not fall within the remit of NFDC, the park communal buildings, spacing of units and other structures which would affect the spread of fire, does.
45/60+ General Needs Block (Open Walkways)	encompasses any building between two and four floors with distinct flats where tenants can live without the need for sharing facilities, with communal stairways and open-air corridors. But where allocation is age restricted.
45/60+ General Needs Block (Direct Entrances)	encompasses any building between one and two floors with distinct flats where tenants can live without the need for sharing facilities, with individual flat entrances (with no internal communal space). But where allocation is age restricted.
Low/medium rise Block (Open walkways)	encompasses any building between two and four floors with distinct flats where tenants can live without the need for sharing facilities, with communal stairways and open corridors.
Low/medium rise Block (Direct Entrances)	encompasses any building between one and two floors with distinct flats where tenants can live without the need for sharing facilities, with individual flat entrances. (with no internal communal space).
Dwelling	encompasses individual dwellings where tenants can live without the need for sharing facilities. i.e. Flat, Maisonette, House, Bungalow etc.

Fire Risk Assessment Schedule

Maintaining robust Fire Risk Assessments and action plans on all housing property, the following Risk Assessment Schedule will be applied:

1. Commencing April 2019 a Type 3 FRA (Inc. 100% flats/rooms) will be commissioned for the following building types in the first instance in order to establish a fire compartmentation baseline:
 - Hostels,;
 - Extra Care;
 - 45/60+ Block;
 - 45/60+ Block (Open Walkways);
 - Low/medium rise blocks;
 - Low/medium rise blocks (Open walkways)
2. Any physical or managerial measures identified following assessment will be prioritised commensurate to risk in accordance with the Risk Assessment Action Plan table below which sets out the action plan risk priorities.
3. Additional budget has been allocated within the HRA Capital Planned Maintenance and Improvement budget for 2019/20.
4. For all other building types and thereafter, the following Risk Assessment Schedule will be applied:

CATEGORY	RISK LEVEL	FRA TYPE	FREQUENCY
Hostel	Medium to High	3 (Inc. 100% rooms)	Annual (rooms annually)
Extra Care	Medium to High	3 (Inc. 20% flats on an annual rolling programme)	Annual (all flats will be completed over a 5 year rolling programme)
45/60+ block	Low to Medium	1	3 yearly with annual review
45/60+ block (Open Walkways)	Low	1	3 yearly with annual review
45/60+ block (Direct Entrances)	Low	1	5 yearly with annual review
Low/medium rise block	Low	1	3 yearly with annual review
Low/medium rise block (Open walkways)	Low	1	3 yearly with annual review
Low/medium rise block (Direct Entrances)	Low	1	5 yearly with annual review
Community building	Low	1	3 yearly with annual review
Residential Static Home	Low	1	3 yearly with annual review

Accommodation identified within the Fire Risk Assessment Schedule will have a fire risk assessment completed by a competent person within the rolling period determined by the risk level. The fire risk assessment will identify and evaluate sources of ignition, sources of fuel, passive fire protection measures, and the social environment.

In addition to the above Fire Risk Assessment Schedule, any new housing block acquired or where there is reason to suspect serious risk to residents, a Type 4 FRA will be carried out.

Risk Assessment Action Plan

The outcome of the fire risk assessment will set out an action plan listing physical and managerial measures necessary to ensure that fire risk is maintained at, or reduced to, an acceptable level. Prioritisation will be commensurate to risk, but it is important to acknowledge that major capital work cannot be completed immediately and recommended timescales will be realistic.

The table below set outs the action plan risk priorities:

PRIORITY	DESCRIPTION
3 High	Immediate priority to be actioned within 24 hours to 8 weeks <i>Breaches of legal requirements, which could cause injury and require immediate short term action. Also includes matters that can be resolved at minimal cost</i>
2 Medium	Medium priority to be actioned within 2-6 months <i>Breaches in legislation that may require medium/long term action to resolve</i>
1 Low	Low priority to be actioned within 6 months-1year <i>Items of non-urgent priority or for future consideration</i>

Risk Assessment Review

Fire Risk Assessments will be reviewed:

- In accordance with the Risk Assessment table;
Or following;
- a fire;
- Near Miss;
- the introduction of a significant risk (e.g. persons with behavioural issues, disabilities etc.);
- introduction of new work practices;
- any works affecting the means of escape or alarm systems;
- Or;
- As deemed necessary by the Maintenance Strategy and Compliance Manager or Fire Officer.

Where there is a significant change in use of the building or part of the building, the Housing Estates Manager MUST notify the Housing Maintenance Strategy and Compliance Manager and Fire Officer so that the fire risk assessment is revised without undue delay.

Where a flat is significantly redesigned, consultation with HFRS will be carried out by a competent person to identify any additional fire risk introduced as part of the redesign. The Housing Maintenance Strategy Manager, Operations Technical Manager and Fire Officer will work collaboratively to ensure the best solution is achieved.

Periodic Stock Condition Surveys

In addition to the above Fire Risk Assessment Schedule, it is recognised that the Council has a large number of standalone dwellings. The Council intends to introduce periodic stock condition surveys within all dwellings carried out every five years. The Housing Health and Safety Rating System (HHSRS) inspection examines 29 hazards and will be incorporated alongside this survey assessing fire risk and fire hazards to occupiers. (This will be introduced with effect from April 2019).

Annual Safety Inspections

During annual visits (gas safety inspections/non gas smoke detector inspections etc.), the Council intends to introduce a new measure whereby tenants are provided with specific information regarding fire safety (fire safety leaflet appendix 2) and Operational staff will provide fire safety awareness information and offer the opportunity for tenants to report any issues or concerns relating to fire safety.

Section 8 Personal Emergency Evacuation

The Fire Safety Order, includes the common parts of specialised housing but not resident's private accommodation. However, the vast majority of fires in specialist housing occur within residents own accommodation. Consequently, the vast majority of deaths and serious injuries to residents from fires in specialist housing result from fires that start within a person's own accommodation (and often the room in which the fires starts). The likelihood of fire and the consequential risk to residents normally arises from the characteristics of the residents themselves.

Residents who reside in the Council’s specialist extra care housing schemes range from active older people to those who require additional supported care. For residents who have an additional care support need, a person-centred approach will be necessary to identify additional risk factors arising from aspects of resident vulnerability, taking account of lifestyle, mental capacity to make decisions, physical agility, potential for carelessness, hoarding or lack of awareness increasing the likelihood of a fire occurring.

The care and support provision provided to residents within the Council’s extra care housing schemes is commissioned by Hampshire County Council and is provided by an external Care and Support Provider. This relationship results in ‘dual responsibilities’ on the Council’s Housing Landlord Service, Hampshire County Council and external Care and Support Provider.

The following table sets out the roles and responsibilities for Fire Safety within Extra Care establishments:

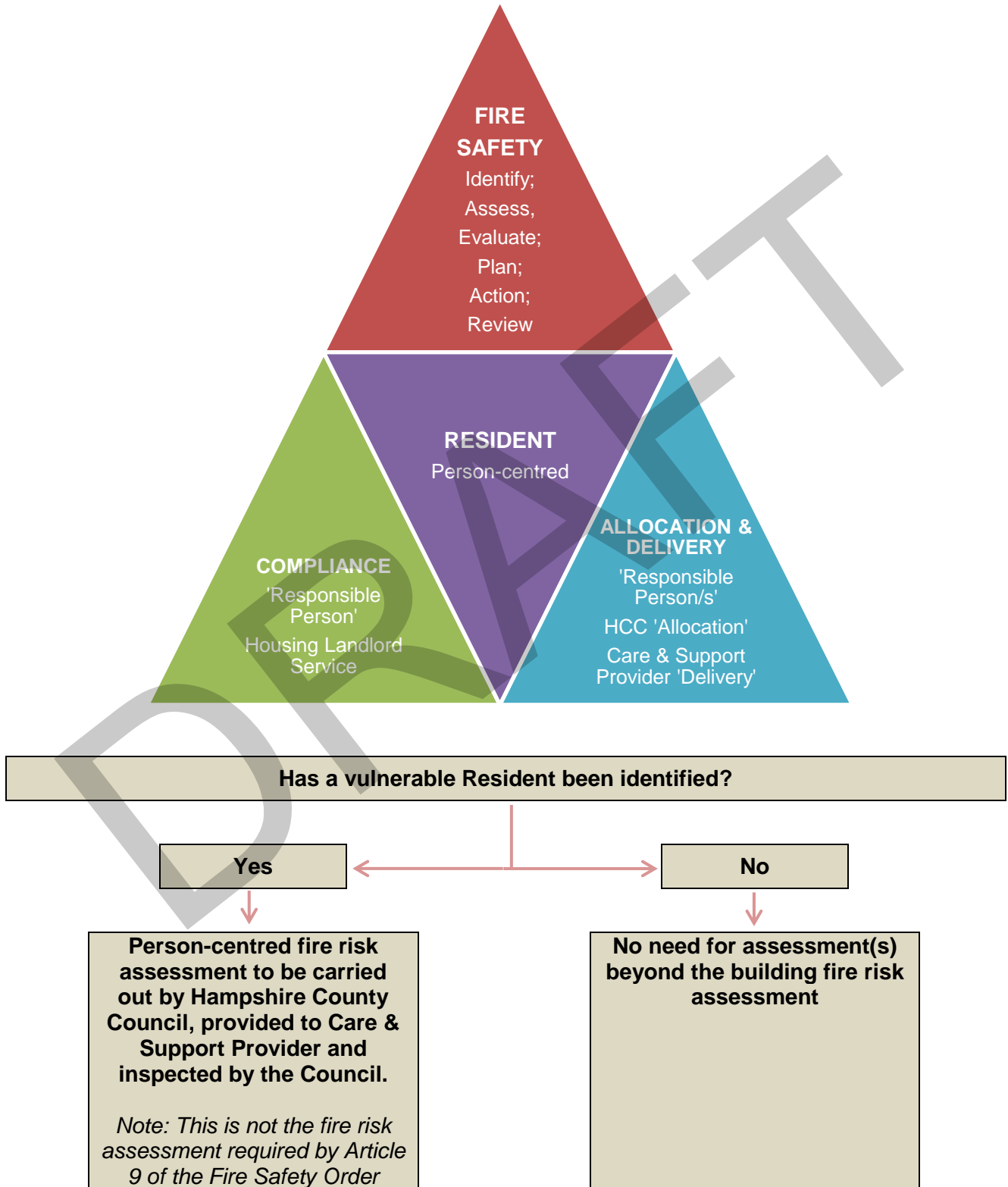
Fire Safety Roles and Responsibilities		
Housing Landlord Services ‘The Council’	Hampshire County Council ‘Care & Support Commissioner’	Care & Support Provider ‘Commissioned Provider’
Undertake Fire Risk Assessment in accordance with Fire Risk Assessment Schedule		
Physical and managerial measures identified as necessary to ensure that fire risk is maintained at, or reduced to, an acceptable level from actions identified on the Fire Risk Assessment		
Fire safety signage		
Residents not requiring ‘Client’ care and support through adult services: Undertake Person-centred fire risk assessments, including liaison with Adult Services and other referral agencies forming part of the ‘allocations’ process	Residents requiring ‘Client’ care and support through adult services: Undertake Person-centred fire risk assessments forming part of the ‘allocations’ process	Draft, implement, monitor and review Personal Emergency Evacuation Plans (PEEP’s) for clients in receipt of care from the commissioned service
Engage with residents on tenancy sign-up to ensure they know what to do in the event of a fire or emergency evacuation of their home, including details of ‘Stay Put’ policy		Engage with residents in receipt of commissioned care to ensure residents know what to do in the event of a fire or emergency evacuation of their home, including details of ‘Stay Put’ policy
Monitor and audit compliance with: ▪ Emergency		Following activation of the fire alarm staff are to instigate the Emergency Evacuation Plan in

<p>evacuation plan;</p> <ul style="list-style-type: none"> ▪ Person-centred fire risk assessments; ▪ Personal Emergency Evacuation Plans 		<p>accordance with this policy paying particular regard to the following:</p> <ul style="list-style-type: none"> ▪ 'Seek and Search' protocol; ▪ 'Stay put' principle; ▪ Personal Emergency Evacuation Plans (PEEP's) <p>PEEP's should be readily available for inspection by HFRS upon their arrival identifying Client's at immediate risk.</p>
Testing and Maintenance of fire safety equipment		
Organise, lead, manage and record 6 monthly fire drills in consultation with Care Provider		Participate in assisting the Council Officers during 6 monthly fire drills to ensure affective understanding of the fire safety plan
Undertake Weekly Fire Alarm Testing		Inform, instruct and adequately train Care staff
Maintain site Fire Log Books (testing)		Maintain site Fire Log Books (activations)
Liaise with Care Provider on all aspects of fire safety	Liaise with 'the Council' on all aspects of fire safety	Liaise with 'the Council' on all aspects of fire safety
<p>Monitor and audit Housekeeping arrangements under the control of the Care and Support Provider:</p> <ul style="list-style-type: none"> ▪ Regulating activities leading to hazardous conditions; ▪ Undertake regular site inspections and action any housekeeping shortcomings. ▪ Act upon reports of risks or hazards made by the Care Provider 		Take all reasonable care to contribute to good housekeeping arrangements and report any service deficiencies, risks or hazards to the Council as and when identified in the course of carrying out contracted care duties
Action any report of disrepair		Report any defect or disrepair concern

Residents residing within the Council's extra care housing schemes, who have been identified as being at risk and requiring extra care and support, will have a person-centred fire risk assessment

undertaken in order to develop a PEEP. The person-centre fire risk assessment and PEEP will give due consideration to:

- Propensity to contribute to the likelihood of fire or fire development;
- Ability to respond appropriately to fire alarm signals or signs of fire;
- Ability to evacuate from the residents own flat in the event of a fire.



The person-centred fire risk assessment will involve the following 9 steps:

PRE TENANCY	Step 1:	Consider the characteristics, behaviours and capabilities of the resident that may lead to fire risk	HAMPSHIRE COUNTY COUNCIL
	Step 2:	Determine the potential causes of fire and the existing measures to prevent fire	
	Step 3:	Identify any circumstances that could lead to the rapid development of fire	
	Step 4:	Identify existing measures to protect the resident if fire occurs	
	Step 5:	Consider capacity of resident to respond appropriately to fire alarm signals or signs of fire	
	Step 6:	Consider ability of resident to make their way to safety	
	Step 7:	Determine level of risk to the resident from fire in consideration to the proposed accommodation allocation.	
ALLOCATION	Step 8:	Prepare action plan (PEEP) for residents in receipt of care from the Extra Care provider.	CARE & SUPPORT PROVIDER
	Step 9:	Determine period for review of the (PEEP)	

The Council's Housing Landlord recognises that in addition to those vulnerable residents who reside in the Council's specialist extra care housing, it is likely that other vulnerable residents may be residing in the Council's wider general needs housing stock.

The Council's Safeguarding Children, Young People and Adults at Risk Policy recognises that the Council delivers a range of services and functions which can bring employees, Members, volunteers and Contractors into contact with vulnerable residents. The Council has to ensure that its functions are discharged to safeguard and promote the welfare of vulnerable residents, including those at greater risk of and consequence of fire within their home.

Council staff, Contractors or Members may be in a position, when coming into contact with residents notice those who may be at greater risk of fire, their ability to respond appropriately and their ability to evacuate should a fire occur. Where concerns are identified, these will be reported to the Housing Estates Manager who will be responsible for ensuring that the necessary referrals to relevant agencies are undertaken including consideration of what further reasonable steps the Council as Landlord can take to minimise risk to the resident.

In consideration of above the Council works closely with HFRS, who offer what is commonly known as a 'Safe and Well' visit. The visit focuses on three key areas:

- Identify and be aware of the potential fire risks within the home;
- Know what to do in order to reduce or prevent these risks;
- Put together an escape plan in case a fire does break out.

Section 9 Fire Prevention, Passive Fire Protection and Fire Suppression

A smoke alarm is critical for the early detection of a fire and could mean the difference between life and death. Fires can occur in a variety of ways and in any room. About two-thirds of home fire deaths occur in homes with no smoke alarms or no working smoke alarms.

In the event of a fire, Passive Fire Protection attempts to contain or slow the spread of fire and smoke and is key in reducing the risk of injury or to life. Passive Fire Protection relies on the integrity of structural fire protection components and fire safety in buildings and is achieved through the use of fire-resistant walls, floors, and doors etc.

All housing property will be maintained to the Decent Homes Standard to provide early warning and minimise the risk and spread of fire.

Manual fire suppression

Manual fire suppression in the form of fire-fighting equipment of the appropriate type, designed to extinguish fires or protect the user from fire will be supplied for staff use within managed accommodation. These will be maintained according to the manufacturer's recommendations.

Alarm Systems

Where an alarm system is installed, it will be maintained according to the manufacturer's recommendations by a nominated contractor. Sounders are to be selected to provide an alarm giving a sound level between 60dB and 65dB. Alarm systems where monitored will be call-handled to ensure a response from the emergency services and reduce false alarms out of normal office hours.

Risk assessment table and type is attached at Appendix 3.

In addition, where a fire alarm system is installed in a building with communal areas, a weekly 'Fire Alarm Test' will be carried out by the Housing Estate Management and Support Officer/Assistant assigned to each building in such a way as to test every call point and sounder on a regular basis. (different call point tested each week to ensure that every one is checked periodically on a rolling basis). Officers will follow a written schedule and be recorded.

Smoke Detection (Domestic single dwellings)

Smoke detectors will be fitted and hardwired in a suitable place in every rented property (one per floor) and will normally be the hallway and landing.

Smoke detectors will be replaced as part of a 10 year rolling replacement schedule or when a deficiency is identified. Through inspection regimes, where additional risks are identified (i.e. hoarding, specific disability or other risk), additional smoke detectors will be fitted to mitigate the risk.

Carbon Monoxide Detection

Carbon monoxide alarms are only required in rooms containing a solid fuel burning appliance (i.e. rooms containing an open fire, log burning stove, etc.). However, as gas appliances can emit carbon monoxide, the Council will fit a Carbon Monoxide detector in every room containing a gas fueled appliance and will be inspected each year as part of the annual gas safety inspection visit.

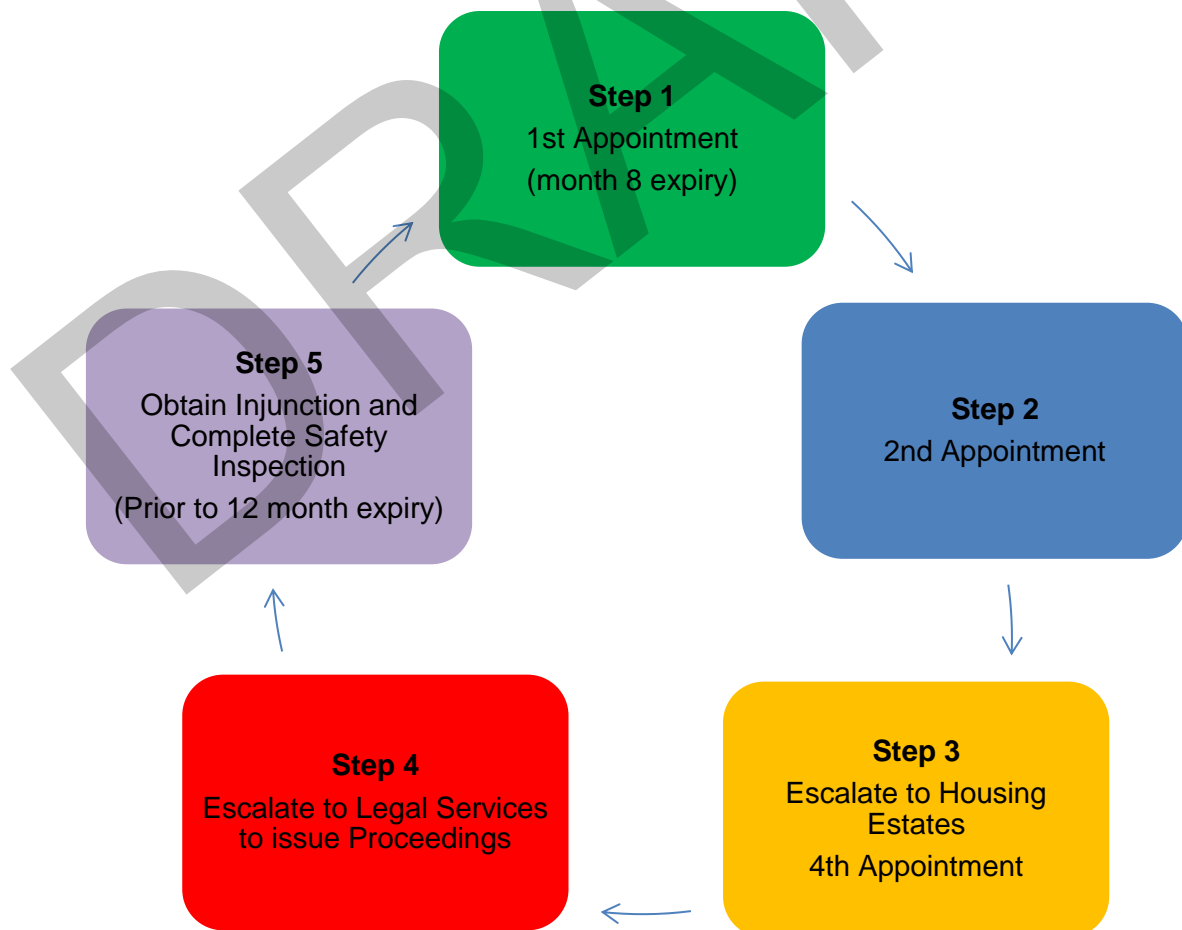
Testing of Services

The Council's Housing Landlord Service, as landlord, is required by law to carry out a gas safety inspection every 12 months on gas appliances and flues in all rented properties. It is important that the Council has effective measures in place to gain prompt entry to carry out these inspections, to comply with its statutory obligations.

Gas

Gas appliances will be serviced and inspected annually and attempts to gain access will commence on a 10 month annual cycle to ensure that every effort has been made to complete the safety inspection by the annual inspection anniversary. Where attempts have failed to gain access to individual dwellings, these will be escalated to Legal Services who will issue proceedings to obtain an injunction. The annual inspection regime also provides an additional opportunity to check for fire risks.

The Table below shows the process of ensuring the Council obtains access to carry out gas inspections:



Electricity

Void properties will not be rented out unless an electrical safety certificate is provided by Housing Maintenance. This will ensure the distribution unit and circuits are all up to the minimum standard required at the time of rental. In addition, all redundant wiring will be removed wherever reasonably practicable.

Domestic and Communal electrical installations will be inspected and tested every 5 years.

Maintenance

The maintenance of passive fire protective measures are key in reducing the risk of fire and mitigating the effects of a fire should one break out. In order to correctly prioritise resources, fire safety repair categories have been introduced:

Response Category		Risk Category	Response Time
Responsive	E = Emergency	Very high	3 hours
	U = Urgent	High	5 working days
	R = Routine	Medium	20 working days
	P = Planned	Low	90 days
PPM = Planned Preventative Maintenance		Low to very low	Inclusion within Planned programme

Emergency Lighting

All emergency lighting systems must be tested monthly. The test is a short functional test in accordance with BS EN 50172:2004 / BS 5266-8:2004. Emergency Lighting will be tested by the Housing Maintenance Building Works team and records retained with the Keystone Database.

In addition to Monthly tests a test for the full rated duration of the emergency lights (e.g. 1-3 hours as per manufacturer's recommendation) must be carried out each year. The emergency lights must still be working at the end of this test.

The result will be recorded on Keystone and, if failures are detected, these will be remedied as soon as possible.

Section 10 Fire Safety Works

Fire Doors (Communal)

Communal doors and associated glazing screens in landings and staircases are to be a minimum 30 minutes fire resisting by their performance under test to BS 476-22 and to be self-closing in accordance with Approved Document B – Volume 1 (dwelling houses). They are to have intumescent strips and include cold smoke seals. Any glass in doors or screens is to be fire resisting to the same duration as the door or screen containing it.

Internal periodic audits of internal fire doors will be completed by a competent person on a rolling schedule proportionate to risk according to BWF (British Woodworking Federation) guidance including flat front doors if possible to ensure that compartmentalisation is maintained to ensure continuing suitability of defend in place/stay put procedure. The documentation arising from these checks are to be held on the Keystone database.

As these doors are heavily used any damage to them or propping open which compromises the integrity of the door to resist fire is to be reported immediately to the Housing Maintenance Strategy Manager for corrective action to be taken.

Fire Doors (Dwellings)

Individual flat front entrance doors provide a key line of defence in fire safety as they form a compartment between the flat and the communal means of escape for other residents of the building. In the event of a fire in the flat the tenants will leave shutting the front entrance door behind them. The Building Regulations in England and associated guidance in Approved Document B – Volume 1 (dwelling houses) clarify flat entrance doorsets that allow access directly into the dwelling from a shared or communal corridor should achieve at least 30 minutes fire resistance, with additional requirements for smoke leakage.

Tenants and leaseholders are not permitted to change the front door to their flat without written permission from the Council. In order to ensure that this door remains fire resisting, any permission will insist that replacement of front doors, frames and door furniture are to be a minimum of 30 minutes fire resisting with intumescent strips and cold smoke seals (FD30S). Written confirmation of compliance will be required upon completion and the work undertaken will be inspected by a competent person.

Doors to Lift plant rooms, Riser Cupboards and Storerooms

Doors and frames are to provide at least FD30 minutes fire resisting by their performance under test to BS 476-22 in accordance with Approved Document B – Volume 1 (dwelling houses). and must be kept locked shut. The lock is to be accessible to the fire brigade. Where inappropriate items are stored, staff are to make contact with the owners and request removal. If not removed within a reasonable period (24hrs for verbal contact, 7 days if in writing), then these items are to be removed and disposed of. Items deemed to be of an 'immediate' fire risk will be removed immediately.

Decorations

Only paints and materials to the Class O for fire protection are to be used in means of escape. Any redecoration of walls and ceilings must be with the same paint system and specified by the manufacturer.

Common Ducts

Communal kitchen or bathroom extraction ducts will be suitably protected to ensure the spread of fire via these ducts is minimised. This may take the form of fire resisting baffles within the duct or intumescent grilles fitted to extraction fans.

Records

A fire record will be held for each Extra Care building indicated on the FRA schedule and this information will be housed within a Fire Information Box (FIB) installed in a suitable position in agreement with HFRS. These will detail floor layouts with flat number, fire escape routes, fire alarm locations, and known tenant issues:

Extra Care Schemes (FIB Contents)

- Risk Assessment;
- Floor Plan;
- Visits from a fire officer;
- PEEPs (Personal Emergency Evacuation Plan)
- Other relevant information (storage of oxygen etc.)

Inspection of Fire Precaution Measures

In accordance with BMTRADA guidance, an internal inspection regime of passive fire precautions will be undertaken by a competent person in every housing block of flats, hostel or community building at intervals no greater than 6 monthly and the records retained within the Keystone database. Inspections will include:

- Front doors to flats;
- Landing fire doors;
- Staircase fire doors;
- Intumescent strips and smoke seals;
- Door closers;
- Glazing;
- Fire stopping to services;
- Signage.

Any repairs identified are to be raised without delay and within the timescales detailed within section 9 of this policy.

Lofts

Following a compartmentation survey, where it has been identified that fire stopping is required, this will be introduced within a timescale based on risk. Where fire stopping is required in a loft adjoining a leaseholder or owner occupier, the Council will progress the required works in negotiation with the leaseholder and/or owner occupier.

Section 11 Resident Involvement and Tenant Responsibilities

New Forest District Council's current Tenancy Agreements or Terms of Lease are a guide to tenants and are in place to compliment this Policy. The 'activities of people' is amongst the highest risk leading to the cause of fire in the home.

It is extremely important that tenants are fully aware of their responsibilities under their tenancy agreement or lease and tenants must comply with the requirements of their tenancy conditions and

how they can access fire safety advice. Most importantly, tenancy conditions make it clear that tenants must not make any material alterations to their homes without the express formal permission of the Council. The Council will take action against any tenant or leaseholder where it has been identified that their Tenancy Agreement or Terms of Lease has been contravened.

Tenancy conditions shall be reviewed to include the provision that tenants MUST report all fires, howsoever caused and regardless of size and/or consequence.

All tenants will be briefed on fire safety measures specific to their new home at sign up. They are to be advised that the Council offer a home safety check and urged to accept the offer, which is free of charge.

The resident involvement team play a role in engaging with tenants in support of understanding the hazards and risks commonly associated with fire. The resident involvement team shall be proactive in their approach in supporting the needs of tenants, by providing regular Fire Safety Advice articles within Hometalk, no less than once per year.

Tenants are required to provide reasonable access as per their tenancy conditions to allow the Council to complete:

- Annual gas safety inspection;
- Periodic electrical installation condition inspection;
- Periodic stock condition survey;
- Repairs and/or replacement of fire prevention measures

Tenants and leaseholders will be expected to comply with the terms of their tenancy agreement or leases in all matters that may have a bearing to fire safety. These include but are not limited to:

Mobility Scooters

Normally, it would be expected that a tenant would store their mobility scooter within the property. However, a tenant may be permitted to store a maximum of one mobility scooter within a designated area under the following conditions:

- The designated area will be clearly laid out;
- It does not obstruct the main thoroughfare;
- All flammable articles and substances (including oxygen) are removed;
- Charging is only to be undertaken whilst in flats or designated area unless specific provision is supplied by the Council.

Security Gates / Doors

Security gates (gaol gates) or Sitex type doors are NOT PERMITTED and are specifically excluded in the tenancy agreement.

Storage

Tenants are not permitted to store possessions in the communal areas of multi-storey buildings.

Large or wooden furniture, curtains and anything that obstructs an escape route or poses significant fire loading are NOT PERMITTED. Where inappropriate items are stored in communal areas, staff are to make reasonable efforts to discover the owners and request removal. If not removed within a reasonable period (24hrs for verbal contact, 7 days if in writing), then these items

are to be removed and disposed of. Items deemed to be of an 'immediate' fire risk will be removed immediately.

Fire Doors

Individual flat front doors provide a key line of defence in fire safety and tenants and leaseholders are not permitted to change or alter the front door to their flat in any way without written permission from the Council.

Significant Changes

Tenants and leaseholders have a duty to request written permission from the Council before commencing any significant changes to their flat and requests will be refused if the fire integrity of the property is likely to be adversely affected. Tenants and leaseholders are required to re-instate any alterations that have not been approved in writing by the Council and an inspection will be carried out following reinstatement.

Home Safety Checks

Home safety checks are offered free of charge and will be promoted by the Council. Any feedback from the Council following a home safety check will be implemented according to the agreed Housing Maintenance Policy repairs categories.

Tenants are required to provide reasonable access as per the tenancy agreement to allow the Council to complete annual gas safety and periodic electrical installation condition inspections and allow the Council to conduct their periodic stock condition survey encompassing a home safety inspection.

Existing tenants will be recommended to request a free home safety check from the Council. All relevant information and contact numbers will be supplied.

Existing Leaseholders and Owner Occupiers

Once a Council property has been sold it is not the responsibility of the Council to carry out any fire precaution work within the actual dwelling itself.

If however, the fire risk is within a communal area or affects a communal area, a Risk Assessment must be carried out by a competent person and any remedial actions arising will be taken to reduce risk in an agreed priority. Leaseholders will be consulted in accordance with Section 20 of the Landlord and Tenant Act 1985 (as amended).

Evacuation Plan 'Stay Put' Principle

The National Fire Chiefs Council supports the principle of a 'Stay Put' strategy wherever possible. The Stay Put strategy has been proved over many years to be safe for residents of purpose-built blocks of flats where following assessment fire compartmentation has been confirmed. This will be the principle advice given to residents.

The Stay Put strategy in summary will provide the following advice to residents of purpose-built blocks:

- Where a fire starts in a flat, the occupiers are to leave the flat, closing the front door behind them and raise the alarm (dial 999 and ask for the Fire Service). They should leave the building by the stairs and meet the fire service when they attend;
- All other flat occupiers should remain in their flat with the doors and windows closed unless there is significant smoke ingress to that flat. If residents feel they are at significant risk, they are to leave their flat, closing the front door behind them and leave the building;
- Any person in the common parts of the building is to leave the building by the nearest safe route;
- Lifts should not be used in the event of a fire. Smoke venting will be maintained to ensure stairways remain available for evacuation.

Former sheltered schemes are no longer staffed or manned by 'on site' staff and are classed as general needs with age restrictions. Accommodation within these premises is allocated to prospective tenants aged over 45 or 60, depending on the individual building. It is recognised that the 'Stay Put' principle and current fire alarm systems do not support one another and require modification.

The Council will commission a Type 3 FRA (Inc. 100% flats) in order to confirm fire compartmentation compliance of the individual premises. A scheduled programme will commence to install standalone hard-wired smoke detectors to each dwelling prior to arranging for the removal of existing common fire alarm systems.

To ensure the continued safety of residents and visitors the Tenancy Management team will continue to engage with tenants, highlighting the evacuation plan and 'stay put' principles and suitable action to take in the event of a fire, either within their own flat or communal areas. This will be supported through improved signage in all communal areas with written communication to each tenant confirming what action to take in an emergency. These measures will be further supported by staff through proactive engagement with residents during their building inspections.

Equalities and Diversity

The Council will endeavour to identify and support residents who have an increased risk in the event of fire. This includes those with recognised disabilities who may need assistance to evacuate the building. There may also be residents whose behaviour as a result of vulnerability increases the likelihood of a fire starting.

Section 12 Liaison with Emergency Services

New Forest District Council is committed to working with the Hampshire Fire and Rescue Service and other emergency services, to create a safer place to live and work and promote best practice in reducing fire risk.

Liaison is also a critical part of identifying trends and working with HFRS to develop methods of risk identification and risk reduction. Both parties, HFRS and the Council, will share relevant information to reduce fire risk to as low as reasonably practicable and will include:

- Provision of a list of all Council managed properties;
- Joint working to enable accurate assessments of risk;
- Provision of HFRS training to enhance fire awareness of visiting officers;
- Sharing of the key results of home safety checks;
- Sharing information on fire incidents.

Section 13 Appendices

- 1 Roles and Responsibilities Table
- 2 Person-centred Fire Risk Assessment Template
- 3 Personal Emergency Evacuation Plan Template
- 4 Tenant Fire Safety Information Guides
- 5 Fire alarm Risk Assessment Table and Type
- 6 Hampshire Fires and Rescue Service Steering Protocol

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Executive Head of Governance and Regulation
<p>The Executive Head of Governance and Regulation has overall strategic responsibility for the Council's approach to fire safety in social housing controlled by the Council and is responsible for ensuring that the requirements of the Fire Safety Order and Housing Act 2004 and supporting Regulations are applied and implemented and to nominate one or more persons to act on their behalf to discharge their responsibilities.</p> <p>The Executive Head of Governance and Regulation will ensure that adequate resources are allocated to managing fire risk, including:</p> <ul style="list-style-type: none"> ▪ Being the 'Responsible person' for the purposes of the Regulatory Reform (Fire Safety) Order 2005; ▪ Maintain an up to date property asset register; ▪ Ensure that adequate processes and procedures are in place to manage fire risk; ▪ Ensure suitable and sufficient information, instruction and training is carried out for staff and contractors; ▪ Monitor the performance of staff and contractors; ▪ Ensure that members of the public, staff and contractors are not unnecessarily exposed to fire risk.
Housing Service Managers
<p>The Housing Service Managers will have been delegated responsibility by the Executive Head of Governance and Regulation and are responsible for the overall effectiveness of the Housing Landlord Services Fire Safety Policy in their areas of responsibility and will:</p> <ul style="list-style-type: none"> ▪ Ensure adequate resources are allocated to manage fire risk; ▪ Monitor the performance of their subordinates against the policy; ▪ Advise the Executive Head of Governance and Regulation of any problem arising in connection with the management of fire risk.
Maintenance Strategy and Compliance Manager
<p>The Maintenance Strategy and Compliance Manager will be responsible for overseeing the day to day management of fire precautions to all Council owned housing stock, reporting directly to Service Manager for Housing Maintenance and Service Manager Housing Estates, Management and Support and will:</p> <ul style="list-style-type: none"> ▪ Formulate and revise the Council's Housing Fire Safety Policy and Action Plan; ▪ Conduct audits to ensure that the provisions within the Fire Safety Policy are being enforced to the standard required; ▪ Ensure suitable and sufficient information, instruction and training is carried out for staff and contractors; ▪ Ensure that adequate fire risk provision is considered within the Housing Maintenance Asset Management Strategy budget; ▪ Appointing competent persons/contractors to assist with the implementation of preventative and protective measures; ▪ Ensure that appropriate equipment for detecting fire, raising the alarm and fighting fire is provided and maintained; ▪ Ensure that the fire precautions are maintained effectively; ▪ Investigate fires and fire near miss incidents and introduce controls to reduce the risk of such incidents recurring, to reduce financial loss and to improve fire risk precautions; ▪ Manage the 5 yearly stock condition rolling survey programme.

Fire Safety Officer	
<p>The Fire Safety Officer will be responsible for the day to day delivery of fire precautions to all Council owned housing stock, reporting directly to the Maintenance Strategy and Compliance Manager and will:</p> <ul style="list-style-type: none"> ▪ Lead, manage and implement the requirements of this policy, working closely with HFRS, and other statutory agencies; ▪ Manage the Council’s Housing fire safety management system(s) and coordinate resources, enabling a ‘safety first’ culture of continual improvement of fire safety procedures and systems; ▪ Ensure the Council’s Housing Landlord’s Service maintains legal compliance with statutory fire safety regulations, as well as the Council’s fire standards and associated welfare provisions and standards with regard to Landlord’s health and safety obligations; ▪ Commission, monitor, action and review Fire risk assessments undertaken by external Fire risk assessors; ▪ Conduct audits to ensure that the provisions within the Fire Safety Policy are being enforced to the standard required; ▪ Ensure suitable and sufficient information, instruction and training is carried out for staff and contractors; ▪ Ensure that the fire precautions are maintained effectively; ▪ Investigate fires and fire near miss incidents and introduce controls to reduce the risk of such incidents recurring, to reduce financial loss and to improve fire risk precautions; ▪ Work closely with Housing Estates, Management and Support team in enabling a (safety first) resident involvement fire prevention culture. ▪ Undertake 6 monthly passive fire precaution inspections. 	
Housing Estates Manager	Maintenance Operations Managers
<p>The Housing Estates Manager, Maintenance Operations Manager and Maintenance Operations (Technical) Manager are responsible for the detailed arrangements necessary to manage fire risk within their respective areas of control. Where contractors are being managed and there is likelihood that fire precautions may be affected, regular monitoring is to be included to ensure these precautions are maintained and will:</p> <ul style="list-style-type: none"> ▪ Ensure adequate resources are made available to manage fire risk in Extra Care schemes, Hostels, General needs decommissioned schemes and walk-up blocks; ▪ Ensure all employees receive adequate information, instruction and training, including the provision of regular refresher training to maintain knowledge and skills; ▪ Monitor the performance of their subordinates against the policy. 	
<ul style="list-style-type: none"> ▪ Assess tenants suitability for accommodation; ▪ Liaise with Care Providers on all aspects of fire safety; ▪ Undertake person-centred risk assessments; ▪ Undertake Personal Emergency Evacuation Plans (PEEP’s); ▪ Undertake Weekly Fire Alarm Testing; ▪ Maintain site Fire Log Books; ▪ Manage Housekeeping arrangements; ▪ Engage with residents; 	<ul style="list-style-type: none"> ▪ Carry out remedial action as determined by Fire Risk Assessments; ▪ Affective monitoring of contractors; ▪ Ensure refurbishment works are undertaken in accordance with Building Regulation Approved documents; ▪ Engage with Leaseholders; ▪ Undertake Periodic stock condition surveys.

Appendix 1 – Roles and Responsibilities Table

Gas Manager	Electrical Manager
<p>The Housing Maintenance Gas Manager and Electrical Manager are responsible for the detailed arrangements necessary to manage fire risk within their respective areas of control. Where contractors are being managed and there is likelihood that fire precautions may be affected, regular monitoring is to be included to ensure these precautions are maintained and will:</p> <ul style="list-style-type: none"> ▪ Ensure adequate resources are made available to manage fire risk by undertaking periodic safety compliance inspections in a timely manner in accordance with statutory requirements; ▪ Ensure all employees receive adequate information, instruction and training, including the provision of regular refresher training to maintain knowledge and skills; 	
<ul style="list-style-type: none"> ▪ Ensure all gas work is undertaken in accordance with Gas Safety (Installation and Use) (Amendment) Regulations 2018; ▪ Undertake Periodic Gas Safety Inspections; ▪ Undertake Periodic Carbon Monoxide Detection Inspections. 	<ul style="list-style-type: none"> ▪ Ensure all electrical work undertaken in accordance with BS 7671:2018 Requirements for Electrical Installations – IET Wiring Regulations (18th Edition); ▪ Undertake Periodic testing of emergency lighting; ▪ Undertake Periodic inspections of electrical installations; ▪ Undertake Periodic inspections of standalone smoke detection.
Employees	
<p>All Employees of New Forest District Council, irrespective of their position, has a responsibility to:</p> <ul style="list-style-type: none"> ▪ Take reasonable care for their own Health and Safety and that of other persons who may be adversely affected by active and/or passive fire precautions, including members of the public, tenants, visitors and contractors; ▪ Co-operate with NFDC and its managers to enable compliance with this policy and the legal duties it holds; ▪ Diligently undertake fire safety works or repairs to ensure that the desired standard of fire precautions are maintained; ▪ Remove or reduce hazards that, in their opinion, may present a serious risk to health of themselves or others; ▪ Report hazards that have been removed or that may present a serious risk of fire; ▪ Report concerns where vulnerable residents may be at additional risk from fire or the consequences should a fire occur. 	
Care and Support Provider	
<p>The Care and Support provider will work with the Council to ensure detailed arrangements necessary to manage fire risk within their respective areas of control and are required to:</p> <ul style="list-style-type: none"> ▪ Undertake their own risk assessments at all housing schemes they provide their services and ensure these risk assessments are regularly updated and adhere to the Council's fire safety policy for Housing Landlord Services. Any changes to the policy will be notified by the Council to the commissioned Care Provider. ▪ Undertake and implement Personal Emergency Evacuation Plans (PEEP's) for those residents in receipt of care from the Extra Care & Support Provider a copy of Risk Assessments, Fire Policy and Procedures to the Landlord on request; ▪ Implement a 'Seek and Search' protocol for fire alarm activations within Extra Care housing schemes where they are contracted to provide care, in order to adopt the appropriate evacuation procedure if required and minimise false alarm calls to the Fire Service; ▪ All employees receive adequate information, instruction and training. 	

Person-Centred Fire Risk Assessment

Name of resident			
Full address			
Date		Form completed by	

1. Does the individual have an increased risk?

- Yes** If yes, tick all the fire risk factors they exhibit
- No** Skip to next question
- Smoking – with signs of unsafe use of smoking or vaping materials (e.g. smoking in bed).
 - Use of emollient creams that are petroleum or paraffin based.
 - Air pressure mattress or oxygen cylinders are used.
 - Unsafe use of portable heaters (e.g. placed too close to materials that could catch fire).
 - Unsafe cooking practices (e.g. cooking left unattended).
 - Overloaded electrical sockets/adaptors or extension leads.
 - Faulty or damaged wiring.
 - Electric blankets used.
 - Previous fires or near misses, burns or scorch marks on carpets and furniture.
 - Unsafe candle/tea light use (e.g. left too close to curtains or other items that could catch fire or within easy reach of children or pets).
 - Other (please specify): _____

2. Would the individual be less able to react to an alarm or fire?

- Yes** If yes, tick all the fire risk factors they exhibit
- No** Skip to next question
- Mental health issues (e.g. dementia, anxiety or depression).
 - Cognitive or decision making difficulties.
 - Alcohol dependency or misuse of drugs.
 - Sensory impairments (e.g. hard of hearing or sight loss).
 - Other (please specify): _____

3. Does the individual have a reduced ability to escape?

- Yes** If yes, tick all the fire risk factors they exhibit
- No** Skip to next question
- Have restricted mobility, are frail or have a history of falls.
 - Are blind or have impaired vision.
 - Lacks capacity to understand what to do in the event of a fire.
 - Is a hoarder, or there are cluttered or blocked escape routes.
 - Are bed or chairbound.
 - Internal doors are left open at night.
 - Would be unable to unlock front door to escape.
 - Other (please specify): _____

4. What to do next?

If there are any questions in sections 1 to 3 that have been answered 'YES', this suggests there may be a heightened risk. Immediate actions are required to ensure agreed safety measures are in place and must be incorporated in the Personal Emergency Evacuation Plan (PEEP):

<p>In addition, extra support and advice can be sought from:</p> <ul style="list-style-type: none"> ▪ Hampshire Adult Social Care Tel: 0300 555 1386 ▪ Hampshire Fire & Rescue Service for home safety advice Tel: 023 8062 6751 Email: community.firesafety@hantsfire.gov.uk Web: www.hantsfire.gov.uk/yoursafety ▪ New Forest District Council Housing Estate Management. Tel: 023 8028 5222 	<p>Following completion this checklist is to be returned to:</p> <p>New Forest District Council Housing Landlord Services Appletree Court Beaulieu Road Lyndhurst SO43 7PA</p> <ul style="list-style-type: none"> ▪ Inform the resident or other family members of the risks identified and any agreed action that you will undertake; ▪ If a care plan exists, all actions taken should be noted in that plan and shared with commissioned care providers of extra care schemes; ▪ Ensure all appropriate partnership referrals are completed and actioned as required.
--	--

Personal Emergency Evacuation Plan (PEEP)

PERSONAL EMERGENCY EVACUATION PLAN	
Name:	
Building:	
Property number:	
Floor:	
Number of occupants:	
Phone number or Ext.	
AWARENESS OF PROCEDURE	
E.g. Can the Resident hear the existing fire alarm system? Y / N (Please highlight/circle as appropriate and measures to be implemented to reduce harm)	
PERSONALISED EVACUATION PROCEDURE (A step by step account beginning with the alarm). If additional needs are identified please expand rows accordingly)	
1	
2	
3	
4	
5	
6	
METHODS OF ASSISTANCE (e.g. Methods of guidance, transfer procedures etc.)	
E.g. Can the client walk, self-propel wheelchair, evacuation chair etc.	
The following have been designated to give assistance	
Name	
Contact Details (Building, Rm No and Ext)	
Name	
Contact Details (Building, Rm No and Ext)	

EQUIPMENT REQUIRED (including means of communication, assistance from fire service personnel)

ADDITIONAL INFORMATION

MONITOR AND REVIEW (must be completed annually and when needs or abilities of resident change)

PEEP should be rehearsed to test their efficiency.

It is envisaged that the PEEP Assessment will be completed prior to the resident taking up occupancy and thereafter be updated:

- Following a change in the residents' health, mobility or general behaviour;
- On an ongoing basis at least every 12 months

Staff signature		Date	
Signed by Individual		Date	

Fire Safety in the Home

[Fire Safety in the Home \(including easy read version\)](#)

[Fire Safety for People with Sight, Hearing or Mobility Issues \(including large print version\)](#)

Fire Safety for Children

[Frances the Firefly: Children's Story about the Dangers of Fire](#)

Fire Safety Seasonal

[Fire Safety When Celebrating](#)

[Fire Safety Tips for Christmas](#)

[Fire Safety in the Winter](#)

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Appendix 5 – Alarm Risk Assessment Table and Type

ADDRESS	ACC TYPE	FRA RISK	FRA TYPE	FRA ASSESSOR	FRA ANNUAL REVIEW	FRA FREQUENCY	FIRE ALARM	FIRE SYSTEM CATEGORY	MONITORING
ROBERTSHAW HOUSE	General needs 45+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP5	Part 1 L2 System within communal areas LD3 heat and smoke detection within flats	ATC
COMPTON HOUSE	General needs 45+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP5	L3 system within communal areas LD3 grade D systems within flats	ATC
WHITECROFT	General needs 45+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP3	Part 1 L2 System within communal areas LD3 Grade D heat and smoke detection within flats	ATC
WILSON COURT	General needs 45+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP3	Part 1 L2 System within communal areas LD3 Grade D heat and smoke detection within flats	ATC
SARUM HOUSE	General needs 45+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP5	L3 system within communal areas LD3 grade D systems within flats	ATC
LAWRENCE HOUSE	General needs 45+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP3	L2 system within communal areas FRA does not system type within flats	Kestrel
CORBIN COURT	General needs 45+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP5	L2 system within communal areas LD3 grade D systems within flats	ATC
MARRYAT COURT	General needs 45+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP5	L2 System within communal areas LD2 smoke/heat within each flat	Kestrel

Appendix 5 – Alarm Risk Assessment Table and Type

ADDRESS	ACC TYPE	FRA RISK	FRA TYPE	FRA ASSESSOR	FRA ANNUAL REVIEW	FRA FREQUENCY	FIRE ALARM	FIRE SYSTEM CATEGORY	MONITORING
EVERGREENS	General needs 60+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP3	L4 system within communal areas LD3 Grade D within flats	ATC
HOWARD OLIVER HOUSE	General needs 60+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP3	L2 system within communal areas LD3 systems within flats	ATC
CAMPION HOUSE	General needs 60+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ZITON ZP3	L2 system within communal areas LD3 systems within flats	ATC
SOLENT MEAD	General needs 60+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	HAES	L2 system within communal areas LD3 systems within flats	ATC
FLATS 1 - 7A CLARKS CLOSE	General needs 60+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	HAES	L4 system in communal areas LD3 Grade D within flats	ATC
FLATS 16 - 27 CLARKS CLOSE	General needs 60+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	HAES	L4 system in communal areas LD3 Grade D within flats	ATC
BANNISTER COURT	General needs 60+	Low-Med	Type 1	External	Internal Fire Officer	3 yearly (annual review)	ADVANCED	L3 system within communal areas LD3 grade D systems within flats	ATC
COMMUNAL LOUNGE EWART COURT	Community	Low	Type 1	External	Internal Fire Officer	3 yearly (annual review)	HAES	L3 system	ATC
BARFIELDS	Extra Care	Med-High	Type 3	External		Annual (20%)	ZITON ZP3	L2 fire alarm system throughout	ATC
WINFRID HOUSE	Extra Care	Med-High	Type 3	External		Annual (20%)	ZITON ZP3	L2 system throughout	ATC

Appendix 5 – Alarm Risk Assessment Table and Type

ADDRESS	ACC TYPE	FRA RISK	FRA TYPE	FRA ASSESSOR	FRA ANNUAL REVIEW	FRA FREQUENCY	FIRE ALARM	FIRE SYSTEM CATEGORY	MONITORING
GORE GRANGE	Extra Care	Med-High	Type 3	External		Annual (20%)	ZITON ZP5	L2 system throughout	ATC
BARFIELDS 43-54	Extra Care	Med-High	Type 3	External		Annual (20%)	ZITON ZP3	L2 fire alarm system throughout	ATC
COMMUNAL LOUNGE CLOVER COURT	Community	Low	Type 1	External		3 yearly with annual review	HAES LEVEL 1	L2 system	ATC
WAVERLEY ROAD	Hostel	Med-High	Type 3	External		Annual (100%)	HAES ENVOY	L2 system throughout	Kestrel
14 PARSONAGE BARN LANE	Hostel	Med-High	Type 3	External		Annual (100%)	HAES 9000	L2 system throughout	Kestrel
TOURLANDS HOUSE	Hostel	Med-High	Type 3	External		Annual (100%)	HAES 9000	L2 system	Kestrel
MERRIEMEAD	Hostel	Med-High	Type 3	External		Annual (100%)	KENTEC	L2 systems throughout	Kestrel

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HOUSING OVERVIEW AND SCRUTINY PANEL – 20 MARCH 2019

PROPOSED HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2019 – 2023 - OUTCOME OF CONSULTATION

1. INTRODUCTION

- 1.1 In 2018 the Council undertook a review of the Housing Options Service and the response to homelessness in the district. The review was undertaken with the assistance of the Homelessness Task and Finish Group and the Housing Overview and Scrutiny Panel. The result of this review recommended an assessment of the homelessness situation in the district, in order to formulate a new strategy to prevent homelessness and provide suitable accommodation solutions to homeless households in order to effectively discharge of the Council's statutory duties.
- 1.2 In December 2018 the proposed Homelessness & Rough Sleeping Strategy ("the Strategy") was considered by both Cabinet and Full Council who gave approval for the statutory consultation exercise to commence.
- 1.3 This report sets out the outcome of the consultation.

2. BACKGROUND

- 2.1 In accordance with the Homelessness Act 2002 all local authorities are required to publish a homelessness strategy. As the last homelessness strategy was approved in 2003, it is important that an up to date strategy is in place.
- 2.2 Under s3(8) of the Homelessness Act 2002 before adopting or modifying a homelessness strategy the authority shall consult such public or local authorities, voluntary organisations or other persons as they consider appropriate.
- 2.3 Under s3(4) of the Homelessness Act 2002 the Council must consult with any agency responsible for an action contained within the strategy.

3. CONSULTATION

- 3.1 On the 15 January 2019 the Council opened its consultation on the Strategy. The proposed strategy and a questionnaire were made available on the Housing Section of the Council's website. The consultation ended at 5pm on 20 February 2019.
- 3.2 The following groups were also specifically invited to consult on the Strategy:
 - (a) Statutory, non-statutory agencies and organisations delivering services to vulnerable people in the District.
 - (b) All private registered providers of social housing;
- 3.3 The Service Manager for Housing Options also visited the Job Centre Plus in Ringwood, a Care Leavers' Team Meeting and a Community Mental Health Team Meeting to promote the consultation. A presentation on the Strategy was also given to the Tenant Involvement Group and Homelessness Multi-Agency Forum.
- 3.4 During the consultation period the Service Manager for Housing Options has also responded to a request from Hampshire County Council Children's Services for assistance to review the joint protocol for 16/17 year old homeless people, which, coincidentally, is also an action contained within the Strategy requiring their support to achieve.

- 3.5 The Consultation received 24 responses. 8 responses were from the following organisations:
- a) NHS
 - b) The You Trust
 - c) The Handy Trust
 - d) Acts For Sharing
 - e) Citizens Advice New Forest
 - f) Two Saints
 - g) Community First New Forest
 - h) Tenant Involvement Group (TIG)
- 3.6 The remaining responses were from members of the public or elected Members.
- 3.7 A summary of the responses received, including a summary of the comments made on the Strategy and the Council's responses to them is attached at Appendix 1.
- 3.8 The consultation outcome showed the majority to be in support of the Strategy; with 83% or more of the respondents approving each of the four key strategic priorities.
- 3.9 Following the review of consultation responses two further actions have been added to Strategic Priority 2 to ensure support to both victims of domestic abuse and households with complex needs is identified and provided.
- 3.10 An action to recognise 'Hidden Homeless' households and work with voluntary agencies to provide them access to housing assistance has also been added to Strategic Priority 2. An action to support ongoing refuge provision has been added to Strategic Priority 3 in accordance with the Homelessness Code of Guidance.
- 3.11 The statistics within the final proposed Strategy, at Appendix 2, have been updated to reflect the up to date homelessness situation both locally and nationally, given the first draft of the strategy was completed in September 2018 and other national statistics were not available at that time.

4 CONCLUSION

- 4.1 The majority of respondents to the consultation expressed support for the four key strategic priorities contained within the strategy. Looking at the consultation responses as a whole, it is important to have in mind the Council's commitment within the Strategy to provide its own emergency accommodation and support workers, providing a comprehensive solution to immediate homelessness.
- 4.2 Further, responses have provided insight into how partnerships and other agencies can help deliver the actions within the priorities.

5. FINANCIAL IMPLICATIONS

- 5.1 An increased focus on early intervention and partnership working resulting from the actions in both the homelessness and housing strategies, along with the Council sourcing more of its own emergency temporary accommodation should bring about a more efficient use of the current homelessness budget including a reduction in external Bed & Breakfast spend.
- 5.2 To achieve a number of the key actions contained within the strategy there is a requirement to complement the existing Homelessness and Advice Officer Team with Support Officers who will provide more dedicated welfare support to guide applicants along a pathway to sustaining accommodation and to support rough sleepers through

accommodation pathways. These additional resources are likely to be met from within the overall homelessness budget which will be kept under careful review.

6. CRIME & DISORDER IMPLICATIONS

- 6.1 Ensuring that the right support is provided to homeless people at the right time will reduce any real or perceived crime and disorder issues that may arise from time to time.

7. ENVIRONMENTAL IMPLICATIONS

- 7.1 There are none.

8. EQUALITY & DIVERSITY IMPLICATIONS

- 8.1 This strategy is for the benefit of all of the Council's residents as set out in the key objectives above and will have a positive impact by focusing the Council's resources to take a more proactive approach to the prevention of homelessness. Consideration has been given to the needs of those who identify with protected characteristic groups; in particular those with disabilities (both physical and mental health) who may find it difficult to access the Council's services. However, the Council has implemented partnership working with other agencies through the Multi-Agency Homelessness Forum and will develop further pathways which seek to identify and work with those who require support and assistance to prevent or relieve their homelessness.
- 8.2 This strategy must be read alongside the Council's other key housing initiatives including the Housing Strategy and the new proposed Allocations Policy which will all provide a means to meet the housing needs of those within these protected characteristic groups. It is recognised that the way in which the strategy is implemented and the impact on those with a protected characteristic will need to be regularly monitored to ensure that those residents are able to take advantage of the strategy's key objectives.

9. PORTFOLIO HOLDER'S COMMENTS

- 9.1 In leading the Homelessness Task and Finish group over the last year I have understood first-hand the huge impact homelessness has on the people of the New Forest and on the Council in responding to the issue. I have called for measures to be put in place to address this impact and I welcome the new Homelessness and Rough Sleeping Strategy; with a set of key priorities that aim to end rough sleeping, increase access to suitable accommodation and which review frontline services to the betterment of those who approach for assistance.
- 9.2 I recognise the consultation responses reflect the views of a number of organisations and individuals. We have considered them all in our review and understood the wide range of views which both support the new strategy or provide us with valuable insight on how we may go about delivering our key priorities. As a result we are happy to make some minor additions to the strategic priorities to clarify our commitments. Overall I am pleased to see our changes are widely supported.

10. RECOMMENDATIONS

- 10.1 That the Housing Overview and Scrutiny Panel consider the response to the statutory consultation and make recommendations to Cabinet as appropriate.

For further information contact:

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Background Papers:

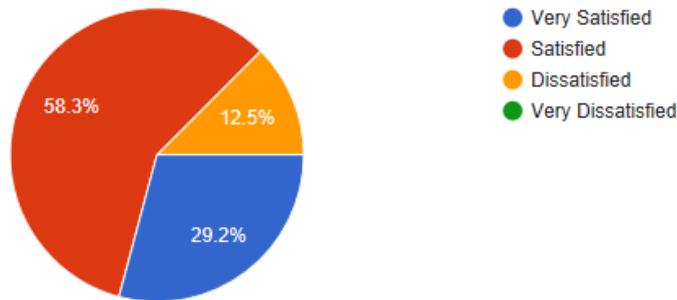
Public documents

Homelessness & Rough Sleeping Strategy – Summary of Consultation Responses

Format of Strategy

How satisfied are you with the format of the draft strategy?

24 responses



COMMENTS: Comments received in support of the format were:

“It is a clear and easy to digest strategy document”.

“Well formatted and easy to read”.

“Clear and concise with specific actions.”

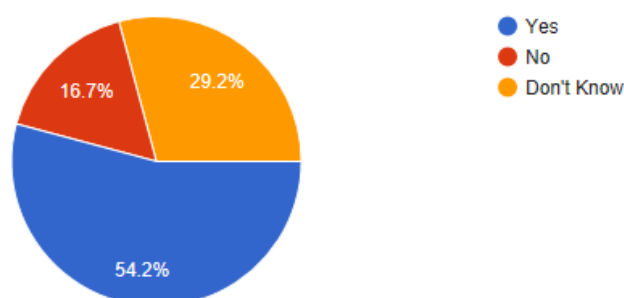
Whilst there were no negative comments received about the format the following comment was received:

“The question is not clear. We ...found the draft strategy document easy to access online but wonder if has been made available to those who will be or have been affected by homelessness. What methods is the Council using to ensure those who will benefit or be disadvantaged by the strategy are able to respond?”

COUNCIL’S RESPONSE: In formulating the strategy the Council has listened and responded to hundreds of views and experiences, both positive and negative, of homeless applicants over the last 12 months. These include statutory reviews and corporate complaints. The Key Priorities are a reflection of the areas where the Council wishes to improve in order to provide a fully comprehensive service to homeless people. The Council understands there is much work to do and annual reviews of the strategy will monitor progress and ensure further consultation takes place. On this occasion the Council has consulted with all service providers delivering services to vulnerable people and given them every opportunity to respond on their service users’ behalf and promote the consultation.

The strategy contains a summary overview section on the local homelessness situation in the New Forest District. Do you think this section accurately summarises the local situation?

24 responses



COMMENTS: Comments received in support of this section were:

“This section does accurately reflect the local situation and having the statistics listed really helps to give a picture of why there are significant housing issues with 60% of households earning less than the UK average and the accommodation not being as affordable. The district is unique in it being spread over a wider area and it was good to have the homeless applications identified by area in the pie chart.”

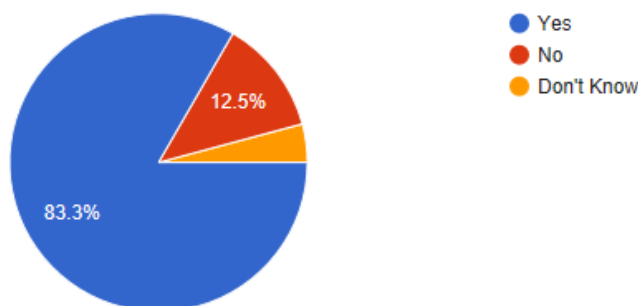
Other views highlighted the needs of the hidden homeless who don't present themselves to the Council:

“...this section records well the situation of people that 'come through the system ' and will consent to their details being recorded and referred through the portal to the NFDC team. There are people outside the system who are very unwilling, for a range of reasons to engage with statutory services. We need to acknowledge that these people exist and any strategy has to include provision / services for people unwilling to engage initially with statutory services (there needs to be alternative routes to help)”.

COUNCIL'S RESPONSE: The Council is receiving an increased number of approaches for homelessness assistance, particularly from single people who make up 37% of all approaches. The Council believes this is a reflection of more and more hidden homeless households approaching for assistance. Whilst we recognise there are still hidden homeless households not accessing our assistance we are committed, through the Strategy, to raising the profile of our service with partner agencies and the wider public to break down any barriers that exist. We are also committed to working with voluntary agencies to create pathways of assistance to those who would not normally approach the Council. Strategic Priority 2 has been amended to include a provision for exploring pathways of support for the 'hidden homeless'.

Do you agree that the Council should prioritise improving its front line services in order to prevent homelessness?

24 responses



COMMENTS: Comments received in support of this priority were:

"We agree that the Council should prioritise improving front line services to prevent homelessness."

"New changes in NFDC staff having tablets etc. to be able to go out to clients is a positive and productive move."

Other views queried how actions within the priority will be delivered:

"...There still needs to be adequate funding for services, such as Nightstop, that support people when they actually experience homelessness"

"...We would like to know how the Council intends to discharge its duty of prevention to people who are being assessed or who are identified as vulnerable, with regard to the provision of emergency accommodation"

"...In terms of homelessness services and increase access to them how is this going to put into effect and what services is this referring to?"

COUNCIL'S RESPONSE: The Council is investing significant funds in sourcing suitable, and furnished, emergency accommodation in order to end the use of B&B accommodation and to respond effectively to emergency homeless presentations. The Council already has plans in place to locate this accommodation in the main population centres around the district and for it to be made available to crisis presentations. The accommodation will have both self-contained and shared facilities and applicants will be provided with bedding, which they keep, and a home starter pack. We have already acquired our first 6 units of accommodation which will see its first occupants housed from 1st April 2019.

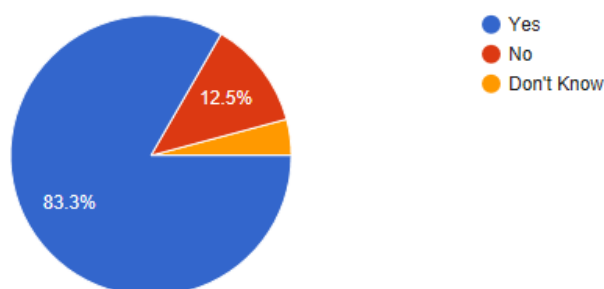
Our proposed action in Strategic Priority 1 commits to ensuring our service is fully accessible giving applicants the flexibility of options to contact the team by phone, in person and online,

but also to provide them useful information which may mean they can resolve the situation themselves. Our service is contactable 24 hours a day with our emergency out of hours service available at weekends and during the night. We will offer appointments in our local offices and seek to explore co-location opportunities with other services around the district. The Council now has a Homeless and Housing Advice Officer present at Inclusion drop in sessions once a fortnight to allow service users an opportunity to access both services at the same time. We will seek to replicate such sessions with other services where appropriate.

Strategic Priority 2: Work with partners and stakeholders to identify issues early on and prevent homelessness by working together

Do you agree with the approach to work with partners and stakeholders to prevent homelessness in the District?

24 responses



COMMENTS: Comments received in support of this priority were:

“As a member of the district homelessness Multi Agency Forum we believe it is essential for partners and stakeholders to work together to prevent homelessness and to support homeless people”.

“The relationship building mentioned to bring in more private landlords is vital to ensure housing availability in the New Forest and is a priority.”

Other views queried how actions within the priority will be delivered:

“...to do this effectively it is important that all partners are aware of current legislation and eligibility”.

“...The council is limited to the amount of support it can provide with everything else that is a priority so it is vital other services work alongside the council to put in place the preventative measures.”

“With Two Saints scaling back their support services there will be a shortfall in homelessness support for anyone who isn't Single and Complex, is it NFDC or HCC who will pay for this? And what will they be offering for anyone that doesn't fit new criteria?”

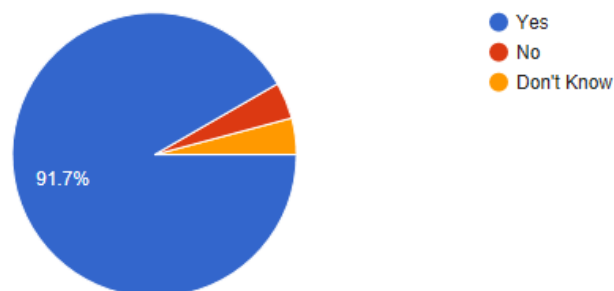
COUNCIL'S RESPONSE: The Council is committed to providing briefings and training to external agencies. Strategic Priority 2 has been amended to reflect this. The Service Manager for Housing Options has already attended several external agency team meetings and provided legislative training. This will be further provided where identified and required. The Multi- Agency Forum will also be used as a platform for updates and training.

In Strategic Priority 1 of the Strategy the Council has committed to review the resources required to further support applicants in order to both prevent and relieve homelessness. The impending reduction of the Hampshire County Council Social Inclusion contract will be a factor in this review. Many of the actions within the Strategy support a multi-agency approach and also recognise that volunteer organisations have expressed their desire to be part of a localised support offering. The Council will therefore explore these opportunities in the coming months.

Strategic Priority 3: Ending the use of B&B accommodation through investing in and facilitating the development and use of good quality affordable housing and temporary accommodation

Do you agree with the Council's approach to ending the use of B&B accommodation through the provision of its own temporary accommodation and increasing access to affordable homes?

24 responses



COMMENTS: Comments received in support of this priority were:

“... agrees with an approach to keep emergency provision within the communities of the New Forest so help and support for individuals can be connected into existing support networks.”

“It is vital B&B use is minimised if not completely stopped as it is not financially sustainable for the Council. B&B's are often not suitable for clients and given the limitation on their budget it is difficult to be able to afford to eat without cooking facilities.”

“We agree that B&B accommodation is unsuitable for many of our vulnerable clients and would welcome this approach ending as it does not provide any wrap around support.”

“The strategy features sensible and well thought ideas but there has to be a guarantee of resource to support all scenarios and emergency situations.”

Other views queried how actions within the priority will be delivered:

“Is there a guarantee that by not considering B&B accommodation at all we are at risk of not resolving an issue and supporting a rough sleeper in a suitable time frame? Any homes that are affordable must be spread around the District and support given by the council working with fellow stakeholders to support these Individuals in to long term housing. Finance is crucial so more detail and figures would be helpful.”

“We would like the council to provide details of what alternative accommodation and support will be available and whether this will be for primarily for families or will it include emergency accommodation for individuals. What other facilities will be available for those whose situation will become more complex if they are placed in Night shelters, where repeat attendance is common or B&B, which is usually long term.”

COUNCIL’S RESPONSE: Through implementing the Strategy the Council is placing a focus on early intervention to prevent homelessness in the first place. This would result in less households requiring emergency accommodation.

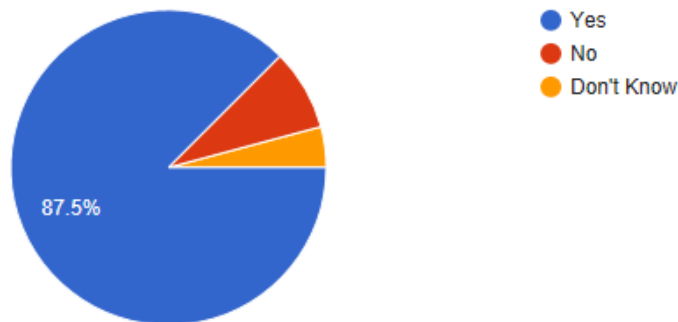
However, where homelessness does occur the Council is committed to having a range of suitable emergency accommodations options available. The Council is investing significant funds in sourcing suitable emergency accommodation in order to end the use of B&B accommodation and to respond effectively to emergency homeless presentations. We already have advanced plans in place to locate this accommodation in the main population centres around the district. The accommodation will cater for both single people and families and will have both self-contained and shared facilities. We have already acquired our first 6 units of accommodation which will see its first occupants housed from 1st April 2019.

In Strategic Priority 4 the Council recognises that the response for rough sleepers and those with complex needs will require effective and practical support and this will go hand in hand with sustaining this new provision of accommodation and moving applicants on to more permanent accommodation. The Council is to review the resources required to achieve this in due course.

The newly adopted Housing Strategy has made a commitment to building more Council housing, at least 600 for the period up to 2026. Through 2018/19 the Council has also increased its portfolio of private sector lease properties (PSLs) and has struck up partnerships with private landlords to secure more properties in 2019/20. The latter will provide further move on options to support pathways out of emergency accommodation.

Do you agree with the Council's approach to placing a greater focus on ending rough sleeping?

24 responses



COMMENTS: Comments received in support of this priority were:

"It mentions the option of looking into using a housing first model which is known and proven to be successful and prevents repeat homeless. This will be very suitable to The New Forest because there is a lot of hidden homelessness where rough sleepers are spread out over a wider area."

Other views queried how actions within the priority will be delivered:

"As stated in the strategy the number of rough sleepers in the district is relatively low. However, there is also a number of "hidden homeless" - sofa surfing, sleeping in outbuildings, cars, public toilets, tents - who do not appear to be recognised under this approach. They are often young, at risk and need follow up advice and care. We would like the Council to clarify how it plans to meet the needs of these vulnerable individuals who are often the most difficult to accommodate."

"Unfortunately, not everybody wants to give up rough sleeping. What does the council do then?"

"The council is not a one stop fix all place - it still needs to work closely with local charities who have the experience and local knowledge of hidden and homeless people (some are not all rough sleepers)."

COUNCIL'S RESPONSE: Through the actions in the Strategy the Council aims to foster effective partnership relationships with organisations, including charities that work with the 'hidden homeless', where housing support can still be provided through a partnership approach. Continuing to raise awareness of the homelessness service and Streetlink reporting has seen the Council receive increased reports of those rough sleeping and high numbers of applications from single people. The Duty to Refer placed upon Public Bodies to

report homelessness has also seen the Council receive additional reports that ordinarily would have gone unreported.

The Council recognises that some rough sleepers make a choice to continue to sleep rough despite efforts to offer accommodation. The combined actions within Strategic Priority 4 propose to demonstrate a long term pathway of accommodation and support for rough sleepers to see a sustainable way off the streets should they choose to do so. The review of support required will include such scenarios to ensure welfare of those continuing to sleep rough is taken in to account.

Final Comments

“This has to be properly funded and support gained from expert organisations who understand the complexities of why individuals are homeless.”

COUNCIL’S RESPONSE:

Through delivery of the strategy the Council aims to enhance its relationships with agencies providing specialist assistance to tackle complex issues in a joined up approach. Recent examples of joint work have led to a number of successful outcomes for complex individuals. The Council seeks to repeat these successes through enhanced relationships with the Multi-Agency Forum and external agencies.

“Tenant Representatives would like NFDC to consider the feasibility of using the following as temporary accommodation for rough sleepers; Shipping containers & Homes made out of recycled plastic (bricks / panels)”.

COUNCIL’S RESPONSE:

The Council is open to exploring innovative accommodation solutions through the provision of both temporary accommodation and the building of new general needs accommodation. Through delivery of the Housing Strategy the Council is exploring such options which would be subject to a feasibility study and planning consent.

Due to the current pressures on emergency accommodation the advanced plans to provide such accommodation include acquiring existing buildings, largely which have been used for similar provision in the past and thus support a quick turnaround.

“What is planned about the lack of a homeless hostel in the New Forest area?”

COUNCIL’S RESPONSE:

The Council is investing significant funds in sourcing suitable emergency accommodation in order to end the use of B&B accommodation and to respond effectively to emergency homeless presentations. We already have advanced plans in place to locate this accommodation in the main population centres around the district. The accommodation will cater for both single people and families and will have both self-contained and shared facilities. We have already acquired our first 6 units of accommodation which will see its first occupants housed from 1st April 2019.

The Council has no plans to provide a night shelter hostel as the numbers rough sleeping at any one time do not warrant the resources and expenditure required. The Council would prefer to work with rough sleepers to access suitable accommodation and support.

“We fully support the homeless strategy and see the council’s commitment to supporting those in need. There is mention of providing better emergency accommodation not using B&B’s however there is not detailed information about what that looks like.”

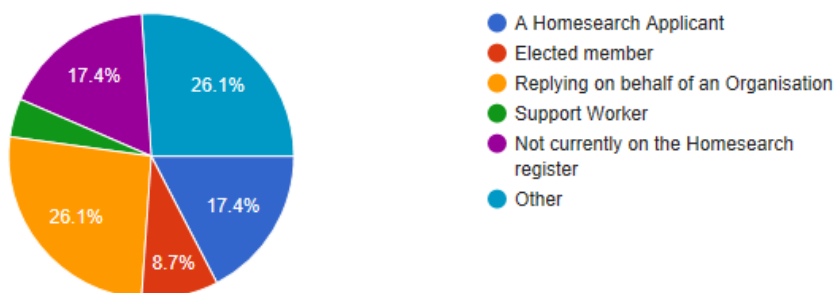
COUNCIL’S RESPONSE:

The Council is investing significant funds in sourcing suitable, and furnished, emergency accommodation in order to end the use of B&B accommodation and to respond effectively to emergency homeless presentations. The Council already has plans in place to locate this accommodation in the main population centres around the district and for it to be made available to crisis presentations. The accommodation will have both self-contained and shared facilities and applicants will be provided with bedding, which they keep, and a home starter pack. We have already acquired our first 6 units of accommodation which will see its first occupants housed from 1st April 2019.

Information About You

Are you?

23 responses



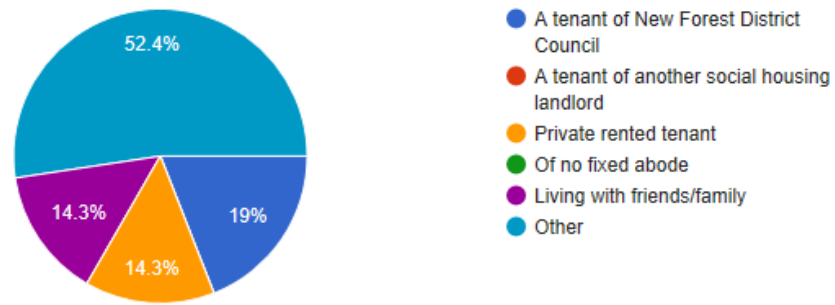
If from an Organisation or other, please state below which one

9 responses

- NHS
- The You Trust
- The Handy Trust Charity (Youth Service)
- Acts 4 Sharing
- Tenant Involvement Group
- Citizens Advice New Forest
- Two Saints Limited
- Community First New Forest

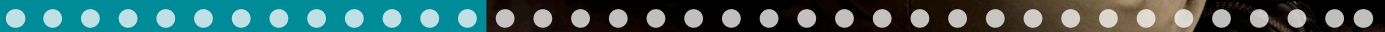
Are you?

21 responses



Homelessness and Rough Sleeping Strategy

2019 - 2023



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Foreword

I am proud to introduce this strategy which sets out our vision for the prevention of homelessness and rough sleeping in the New Forest.

Whilst this strategy demonstrates our key priorities in responding to and preventing homelessness, it is very much linked to our overall strategic vision for housing and the wider housing market in the New Forest, combining with the launch of our new Housing Strategy and our new Allocation Policy.

We recognise that for many people in the New Forest access to secure, good quality affordable housing at a time of economic uncertainty and welfare reforms is extremely challenging. We also recognise the serious impact homelessness has on people's lives and how vulnerable people are adversely affected and are at greater risk of homelessness.

Prevention of homelessness is very much at the forefront of national initiatives and policies to improve peoples' lives. This council is equally committed to early intervention and has fully embraced the principles of the Homelessness Reduction Act 2017 in its service delivery, with access to advice and assistance for all who approach, no matter whether they are vulnerable or not.

We welcome other national initiatives, such as the drive to end rough sleeping and will play our part in tackling this issue locally.

We recognise that early intervention at a local level is extremely important as there is far greater impact on the health and well-being of households once they become homeless.

Responding to individual cases of homelessness crisis is also far more costly for the wider public sector than prevention and we must demonstrate value for money in our approach.

In response to these challenges this new homelessness strategy reflects our strong commitment to tackling homelessness and develops the vision for our frontline services. In the

last year we have made great strides forward with a task and finish member led group scrutinising our response to homelessness.

The strategy looks very much to the future and sets out the actions we intend to take to help us reach our goals and how the council, and its partners, will work together to tackle homelessness and rough sleeping over the next five years.

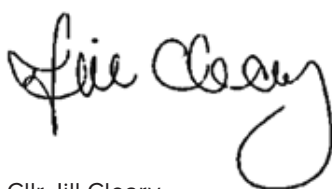
In setting our priorities we will embed specific initiatives aimed to stop people sleeping rough and provide a pathway for those that already find themselves in this situation.

Working in partnership is key to the success of the strategy. This year we have established a multi-agency forum of statutory agencies and local organisations to assist us in our efforts to tackle homelessness. We will continue to engage with, maintain and develop relationships with these organisations and agencies to develop a more cohesive set of priorities.

The strategy aims to develop these priorities in recognition of national, regional and local policy and proposes a vision for the benefit of all our residents, stakeholders and partners.

Our response to homelessness will be reviewed on an annual basis to ensure our initiatives are having the desired outcomes, so that we can stay ahead of emerging trends and so that we can seize opportunities to benefit the people of the New Forest.

I look forward to continuing to work with all people involved in preventing and tackling homelessness in the New Forest.



Cllr Jill Cleary
Portfolio Holder for
Housing Services

Strategic Homelessness and Rough Sleeping Priorities 2019-2023

- Continue to invest in and improve the effectiveness and responsiveness of front line services to prevent homelessness.
- Work with partners and stakeholders to identify issues early on and prevent homelessness by working together.
- Invest in and facilitate the development of good quality affordable housing and temporary accommodation.
- Bring Rough Sleeping to an end.



National context

Nationally, incidents of homelessness have been increasing for a number of years and the increased use of, often unsuitable, temporary accommodation has been a direct consequence.

Homelessness acceptance rates and use of temporary accommodation have gone up nationally in recent years. At nearly 57,000, annual homelessness acceptances were nearly 17,000 higher across England in 2016/17 than in 2009/10. Main housing duty acceptances stood at 42% above their 2009/10 low point.

At the end of March 2018 the most common reasons for loss of last settled homes nationally were:

- Parents, other relatives or friends no longer willing or able to accommodate (28%).
- Loss of rented or tied accommodation due to termination of assured shorthold tenancy (25%).
- Violent breakdown of relationship involving partner (12%).
- Other reason (e.g. homeless in emergency, sleeping rough or in hostel, returned from abroad) (7%).
- Non-violent breakdown of relationship with partner (6%).
- Loss of rented or tied accommodation due to reasons other than termination of assured shorthold tenancy (6%).

On 31 March 2018, the total number of households in temporary accommodation arranged by local authorities under homelessness legislation was 79,880, up 66% on the low of 48,010 on 31 December 2010.

In addition, homelessness services across the country had an inconsistent approach. Some local authorities assisted only those people it owed a statutory duty and those without a 'priority need', particularly single homeless, were not receiving effective and consistent assistance across the country to relieve their homelessness.

With rising homelessness and temporary accommodation costs MPs within Government sought to redress the situation and proposed improvements to the legal framework to prevent and tackle single homelessness more effectively.

A new Homelessness Reduction Framework was proposed and began as a Private Member's Bill introduced to parliament in June 2016 by Bob Blackman, MP for Harrow East. It was published following a homelessness inquiry conducted by a cross-party Select Committee.

In its Homelessness Monitor 2018 report Crisis identified that:

- Since 2010/11, homeless placements in temporary accommodation have risen at twice the rate of homelessness acceptances.
- The national total rose by 8% in the year to 31st March 2017, up 61% on the low point six years earlier.
- A continuation of this trend would see placements topping 100,000 by 2020.
- Bed and breakfast placements now stand 250% higher than in 2009.
- The National Audit Office has drawn attention to a 39% real terms increase in local authority spending on temporary accommodation in the five years to 2015/16.

Summary of Homelessness Statistics	2009/10	2014/15	2015/16	2016/17	2017/18	% change 2009/10-2017/18
Rough sleeping in England – snapshot	1,768	2,744	3,569	4,134	4,751	169
Local authority statutory homelessness cases	89,120	112,350	114,780	115,580	109,380	23
Local authority statutory homelessness acceptances	40,020	54,430	57,740	59,120	56,630	42

The framework was given Royal Assent as The Homelessness Reduction Act 2017 and commenced on 3rd April 2018. The Act amends the legislative framework laid out in the Housing Act 1996 and places new duties on Councils to:

- intervene at earlier stages to prevent homelessness in their areas as the period a household is threatened with homelessness is extended from 28 days to 56.
- provide homelessness services to all those affected, not just those who have 'priority need'.
- identify reasonable steps to help secure accommodation to either prevent or relieve the homelessness of applicants who approach for assistance.

The Act also places a duty of specified public bodies to refer those clients they are working with and are homeless or threatened with homelessness, to a local authority homelessness service. This duty commenced on 1st October 2018.

Recent Central Government policy and initiatives have been focussed on reducing the impact on vulnerable households and to ensure local housing authorities are providing effective prevention activities and consistent frontline services, for all those who approach.

It is part of a continuing national agenda to tackle the root causes of homelessness and drive through change in the housing sector.

Future regulation, policy change and subsequent impacts in the wider housing sector are likely to be driven by:

- Housing White Paper (2017).
- Social Housing Green Paper (2018).
- Licensing of Homes in Multiple Occupation (2018).

- Rough Sleeping Strategy (2018).
- Tenant Fees Act 2019.
- Private Landlords (Registration) Bill 2017-19.
- Lifting of council borrowing caps to encourage council house building.

The Government also continues to evaluate and review access to the private rented sector with the Tenant Fees and Landlord Registration Bills proceeding through Parliamentary process in an effort to redress access to the sector for low income households.

The Government aims to halve rough sleeping by 2022 and end it by 2027. It launched its new Rough Sleeping Strategy in August 2018 and requests that all homelessness strategies are reviewed and rebadged by the end of 2019 to include a specific focus on addressing rough sleeping.

The annual count of those sleeping rough in the autumn of 2018 showed a 165% increase on the figures for the same count in 2010, with a further 2,909 people sleeping rough.

The Government recognises that there is not one single solution to end rough sleeping and a strategic approach to tackling the causes of homelessness and the health and well-being of rough sleepers is as important as the supply of affordable homes and supported housing.

With the lifting of Council borrowing caps to facilitate increased building of social housing, grant funding for tackling Rough Sleeping and new legislation across the social sector Councils must respond to the challenge and co-ordinate effective response to tackling the housing issues in their area.

The profiles of people who currently sleep rough

People who sleep rough in England tend to be:

- Male.
- between 25 and 55 years old.
- Predominantly white.

In the 2018 counts and estimates:

- 84% of people found sleeping rough were men.
- 14% were women (gender for the remaining 2% was unknown).

It is estimated to cost the public purse £21,200 per person per year if rough sleeping occurred alongside substance misuse and offending.

Contributory factors leading to homelessness nationally:

- High demand for housing leading to high house prices & private rents with greater shortfalls between rents and LHA Levels.
- Shortage of social housing for rent.
- Increasing household bills.
- Welfare benefits cuts and reform.
- Cuts in funding for statutory and voluntary services offering support to vulnerable people.

Corporate context

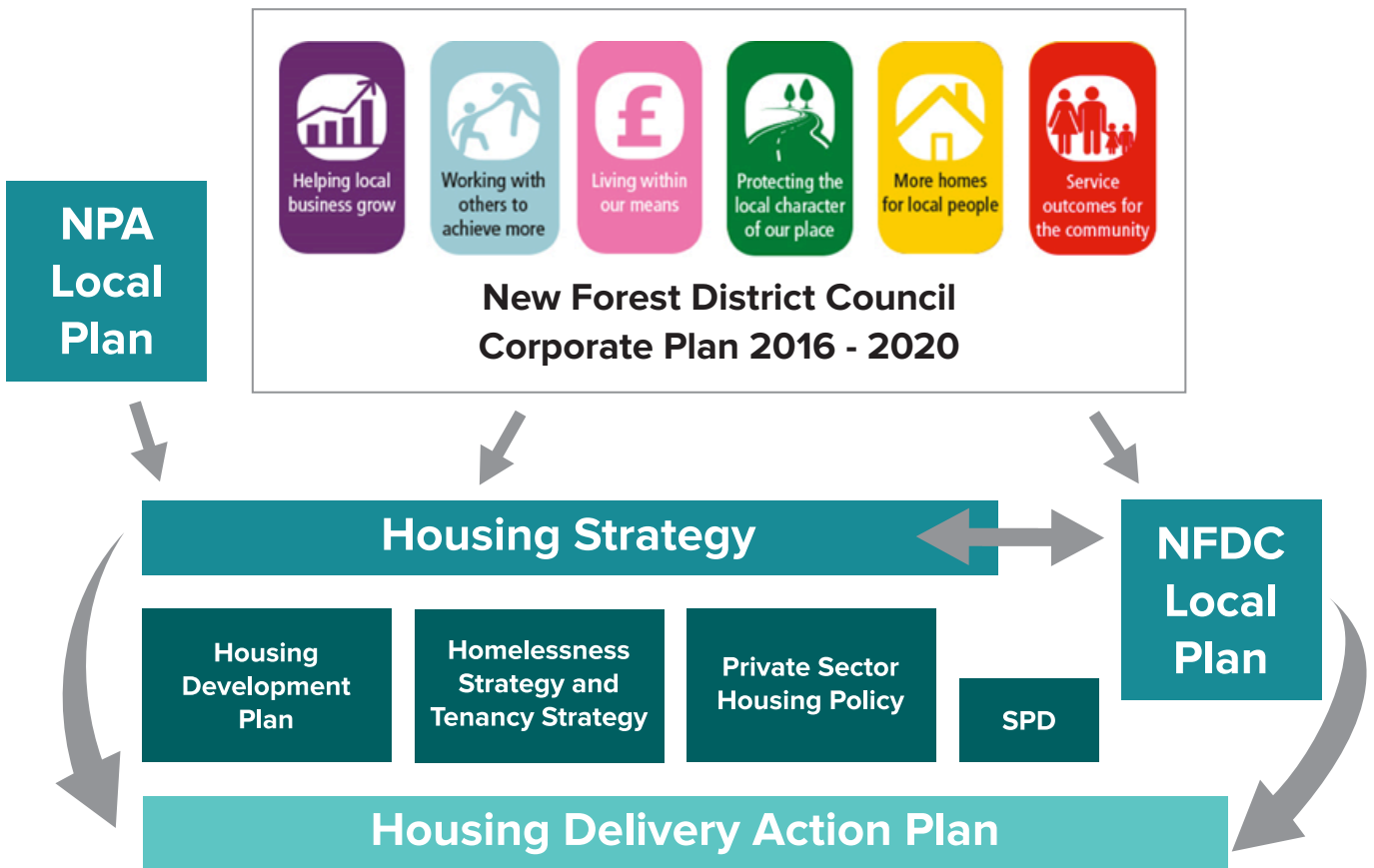
The priorities of the New Forest District Council Corporate Plan not only recognise the importance of delivering more homes for local people (both market and affordable) but the need for our actions and influence to contribute to economic growth, to protect the character of our place, and to optimise our effectiveness by working closely with others.

Sitting alongside the recently published draft local plan - and its 20 year target of 10,500 new dwellings across the New Forest district - the new Housing Strategy contains high level objectives supported by a suite of new operational policies and related strategies, including this

Homelessness and Rough Sleeping Strategy, which is also driving through a review of the Allocations Policy for social housing lettings.

The relationships within and between the various policies and documents will ensure that a composite approach is taken to housing interests in the district, be they related to new-build, the existing stock or duties and services to those who are vulnerable or facing homelessness.

Alongside this strategy the Council's new Housing Strategy, Tenancy Strategy and Allocation Policy brings about a joined up strategic approach to provide maximum benefit and support overall aims and objectives.



*SPD = Housing Supplementary Planning Document

Local context

The district is one of the most populated non-unitary authorities in England with 179,236 residents.

Located between the largely urban areas of Southampton and Bournemouth/Christchurch/Poole the district has unique characteristics with a large National Park area covering the majority of the district.

There are significant housing issues in the district. In contrast with those parts of the district that can be characterised as affluent with house prices and rentals above the UK average, areas of deprivation and a number of significant housing challenges exist, which include:

- Acute income/housing affordability disparity.
- High proportion of high value detached homes with a dearth of smaller homes.
- High numbers of second homes in some parts of the District.
- 60% of households earn less than the UK average.
- 9,000 households supported with Housing Benefit and/or Council tax reductions.
- 28% of the population over 65 years' old.

Low average incomes and high average house prices, results in significant cross commuting between those who work in the forest but can't afford to live here and those who can afford to live within the district but work elsewhere.

Under the pre Homelessness Reduction Act 2017 (HRA) legislation the number of homeless applications increased from the lows of 2011, with the numbers of households accepted as being owed a full duty to secure accommodation by the Council at their highest in 2017/18.

As the Council largely concentrated efforts on those households who met statutory duties the figures are considered an under representation of the homelessness issues within

Homeless applications and decisions by year		
	Total applications taken	Homeless acceptances
2017/18	165	115
2016/17	194	108
2015/16	196	115
2014/15	185	95
2013/14	160	83
2012/13	124	55
2011/12	112	42

the district, when compared with the scope of the new duties under the new Act from 2018.

In 2017/18 115 households were accepted as homeless and owed the main housing duty. This figure has increased year on year and we project the figures for those owed the new legislative duties and subsequently the main housing duty, to be much higher for 2018/19, as the number of approaches to the service continues to rise.

The urban areas of the New Forest district are naturally shown as having the highest levels of homeless applications with the eastern strip of the district representing the source of 49% of all homelessness applications from 2012 to 2018.

All approaches to the service from April 2018 are now recorded. The first 11 months shows consistently high demand, with 1,855 new cases opened and 752 new duties for the council to take reasonable steps to help secure accommodation. 121 cases which have come to the end of their new duties (47% of all duty ended cases), within the first six months, have been successfully discharged by securing accommodation.

The Council has accepted 94 main housing duties in the first 11 months of the HRA. Without further policy intervention these are expected to increase exponentially as more of the new duties come to an end.

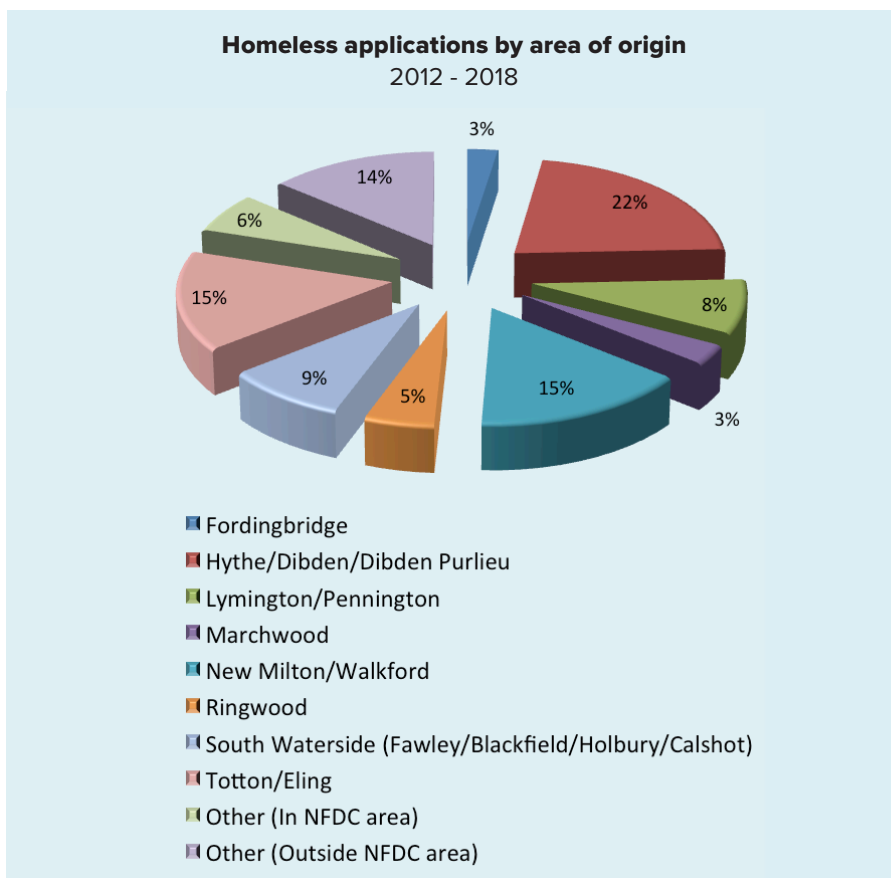
Approaches from April 2018 show the following key features:

- 58% of approaches have dependent children or are pregnant.
- 24% of approaches are single males.
- 13% of approaches are single females.
- 94% of approaches are of white British background with no discernible ethnic group in the remaining 6%.
- 14% of relief duties are granted to cases fleeing domestic abuse.

Although not a determining factor in the award of duty the 'Priority Need' of Relief Duty Cases is recorded to determine temporary accommodation duties and shows:

- 51% of duty cases had a priority need due to dependent children.
- 16% of duty cases had a priority need due to mental health issues.
- 10% of duty cases had a priority need due to physical disabilities.
- 5% of duty cases had a priority need due to experiencing domestic abuse.
- 5% of duty cases had a priority need due to experiencing learning difficulties.

Mental health issues are not just experienced by the 16% above. In fact, 355 applicants and/or household members stated they needed support with their mental health. Many of these applicants have acute needs where holistic partnership working with specialist agencies is required to resolve their housing issues and ability to sustain accommodation in the future. Others will require low level support but it is clear the Council must ensure these services are on offer and there is a route to obtaining such services.



Approaches for assistance under the Homelessness Reduction Act 2017 post 3 April 2018			
Month	New cases opened	Prevention duty accepted	Relief duty accepted
April	176	44	20
May	165	61	14
June	185	60	29
July	164	41	24
August	153	29	20
September	155	35	28
October	166	45	34
November	166	42	16
December	143	32	20
January	230	66	37
February	151	41	14
Total	1854	496	256

The main reasons for homelessness follow national trends. The main cause as shown to the right continues to be family and friends no longer willing to accommodate other households within their properties. This is indicative of these households struggling to obtain or sustain their own affordable housing in either the private rented or owner occupied sectors. Moving in with family is often as a result of having to give up or having lost settled accommodation in the past.

The end of private rented tenancies remains the second most common reason and the council aims to target these areas within its priorities.

The Council aims to increase the provision of affordable housing in the district whilst working with landlords and tenants in precarious housing situations to help sustain accommodation.

Numbers of rough sleepers remains low but is no less important in our efforts to reduce homelessness. These figures represent a core group of rough sleepers with multiple complex needs such as drug and alcohol addictions, mental and physical health issues.

The Council is committed to finding solutions to rough sleeping issues within the district and will include these in its priorities. It is also important that these solutions create long term sustainability to prevent clients returning to the streets.

Main reason for loss of last settled home	2012 - 2018 total of duty acceptances	April 2018 - 28 Feb. 2019 total of new duty acceptances
Parents, other relatives or friends no longer able/willing to accommodate	189	232
Termination of assured shorthold tenancy	185	209
Violent breakdown of relationship involving partner	72	73
Non-violent breakdown of relationship with partner	62	78

Rough sleeper counts							
Year	2012/2013	2013/2014	2014/2015	2015/2016	2016/2017	2017/2018	2018/2019
Number	4	3	9	2	4	7	8

There is high demand for social housing in the area whilst social housing lettings continue to fall year on year, with the number of Council stock lettings being:

- 242 in 2017/18.
- 295 in 2016/17.
- 345 in 2015/16, representing a 30% reduction in 2017/18.

The Right to Buy scheme continues to offset new build additions to the stock. 34 Council properties were sold under the scheme in 2017/18.

Excluding the Council stock, Sovereign are the main social housing provider in the district with nearly 1800 properties. Several other registered provider landlords including Radian, Stonewater, Aster and Vivid provide smaller numbers of units throughout the district.

The New Forest became a full service area for Universal Credit from 26th September 2018. There are 1,462 working age housing benefit claimants in the Council stock and 1,440 in the housing association and private rented stock.

Migration of nearly 2,900 housing benefit claimants to Universal Credit is estimated to begin in 2020. New tenants or those facing a change of circumstances will now be required to claim Universal Credit. The Council will monitor this situation and put in place measures to manage the transition and any concern in the housing market.

Two Saints are commissioned by Hampshire County Council to provide Community Support to vulnerable people, including families and single people in the district. They provide tenancy sustainment, help claiming welfare benefits and help to access services and appointments in relation to health needs.

In the first 6 months of 2018/19 Two Saints supported 191 clients through its drop in sessions alone. The scale of the contract is due to be reduced post August 2019 to single complex people only. It is likely to have a detrimental effect upon support provision to vulnerable households. The Council will include measures to address this shortfall in its priorities.

5,056

Number of council properties

3,354

Number of households on the New Forest Homesearch Housing Register

Emergency Accommodation (EA) Placements post 3 April 2018			
Month	EA placements	Left EA	Households in EA at month end
March			59
April	19	16	62
May	6	23	45
June	15	20	40
July	18	17	41
August	16	21	36
September	17	20	33
October	18	10	41
November	5	18	28
December	15	12	31
January	25	13	43
February	8	20	31
Total	162	190	/

Social Housing Lettings 2017/18		
	General needs	Age restricted
Council Stock	201	41
Registered Provider Stock	101	42
Total	302	83
Overall total	385	

Local services

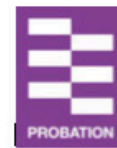
The Council has access to the following principal functions and activities within the New Forest to assist in the prevention of homelessness:

- Community Support for single complex homeless clients provided by Two Saints (From August 2019).
- Community based Inclusion Services to address drug & alcohol addiction needs.
- Three Supported Accommodation projects for residents suffering with mental health conditions.
- NHS Mental Health Services in Totton and New Milton.
- Wellbeing Centres in Hythe and New Milton.
- Supported Housing & Community Support provided by Together who help people deal with the personal and practical impacts of mental health issues.
- Young Person Supported Accommodation with support provided by You First and Two Saints.
- Support for youth homelessness through It's Your Choice and The Handy Trust who offer information and advice about many issues that affect young people including drug and alcohol abuse, sexual health, homelessness, employment & education and mental health issues.
- Supporting Families Programme through the internal Community Safety Team.
- Domestic Abuse support, target hardening and response through MARAC and You First.
- Tenancy Management and Rent Officers for Council owned stock.
- Housing Benefit visiting officers
- Job Centre Plus in Hythe, Lymington and Ringwood.

- Hampshire County Council Adult and Children Services.

The Voluntary Sector provides additional resources and support and includes:

- Benefits advice and advocacy.
- Foodbanks across the district.
- Faith and other voluntary groups providing befriending, practical and mentor support.
- Services for young people.



Hampshire County Council



Actions to date & future direction of travel

In late 2017 the Council recognised that its approach to homelessness and housing would require new impetus and vision to meet the requirements of the Homelessness Reduction Act and housing demand in the district. Full corporate backing was provided to implement a number of changes to lay the foundations for effective future service delivery which will continue beyond the publication of this strategy.

Since the start of 2018 the Council has:

- Allocated a new Executive Head to drive through change across the Housing Service.
- Appointed three new Housing Service Managers including a new Housing Options Service Manager.
- Set up a Task & Finish Member group, led by the Portfolio Holder for Housing Services to establish the priorities for change.
- Reported position statements and priorities for change to the Member led Housing Overview & Scrutiny Panel.
- Utilised grant funding to create three additional Homelessness & Housing Advisor roles and a Service Support role.
- Procured additional temporary accommodation.
- Increased its portfolio of Private Sector Lease (PSL) properties by 14 properties.
- Carried out viability assessments to convert existing communal facilities to emergency accommodation.
- Procured, installed and tailored a Homelessness IT Management System to embed its approach to delivering the Homelessness Reduction Act and produced effective statistics to support initiatives and meet new statutory reporting requirements.

- Participated as a leading development group member in the development of Locata's Homelessness Reduction Act IT system.
- Set up and held three meetings of the Multi-Agency Forum involving statutory and voluntary groups in the district.
- Reduced the numbers of households living in emergency accommodation.
- Continued to accommodate rough sleepers past the provision of the Severe Weather Emergency Protocol (SWEP) in order to co-ordinate work with agencies to end their rough sleeping.
- Acquired 11 properties as part of its 'Buy-Back Scheme'.
- In 2018/19 the Council has budgeted to spend £19m on increasing the council housing stock through development and acquisitions.
- In 2017/18 the Council provided financial assistance to 245 households to secure private rented accommodation.



New build Council properties in Lyminster, 2018

Strategic priority 1

Invest in and improve the effectiveness and responsiveness of front line services to prevent homelessness

We will:

- Ensure the principles of the Homeless Reduction Act are fully embedded and all applicants receive a Personal Housing Plan (PHP) and reasonable steps are identified to help resolve their housing situation.
- Develop housing pathways and discharge protocols with partner agencies, create and provide accessible self-help guides and information for the following vulnerable groups in line with the homelessness code of guidance:
 - people released from prison or youth detention accommodation;
 - care leavers;
 - former members of the regular armed forces;
 - victims of domestic abuse;
 - people leaving hospital;
 - people suffering from a mental illness or impairment; and,
 - other groups we deem at particular risk of homelessness in the district.
- Review and adopt a new Social Housing Allocation Policy to better respond to housing need and homelessness.
- Increase access to homelessness services and housing assessments in satellite and remote locations with the availability of face to face appointments, homelessness referral portal and the expansion of IT facilities, website content and self-help guides.
- Ensure clients have access to Council facilities and dedicated support in order to claim Universal Credit and other benefits online.
- Provide annual training to Homeless and Housing Advice Officers on legislation and welfare benefits plus periodic training to enhance mediation and negotiation skills to help tackle family and landlord evictions.
- Review and optimise internal processes to progress households through our frontline homeless services to move on and independent living.
- Review the current allocation of staffing resources against the requirements of the Homelessness Reduction Act 2017, emerging demand trends, client support requirements, rough sleeper engagement, move on of temporary accommodation and landlord liaison.
- Produce support and resource directories of agencies providing services within the district.
- Monitor the impact of Welfare reforms and the go live of Universal Credit full service post September 2018. Work alongside the Council's Housing Benefit department to action further initiatives.
- Establish a working protocol with the New Forest Supporting Families programme to provide support to vulnerable families in place of the reduced Community Support contract.



Strategic priority 2

Work with partners and stakeholders to identify issues early on and prevent homelessness by working together

We will:

- Continue to develop the Multi-Agency Forum and its outcomes.
- Establish a Landlord Forum to improve relationships with landlords and letting agents to:
 - Improve access to the Private Rented Sector;
 - Maintain Landlord confidence in the sector;
 - Promote early intervention to resolve tenancy issues;
 - Consult on the review of rent in advance and rent guarantee schemes;
 - Promote the Council's Private Sector Lease Scheme;
 - Help create a Private Rented Sector Offer to discharge homeless duties.
- Work with Registered Providers to prevent evictions through joint working arrangements and establish an eviction protocol.
- Promote the duty to refer and develop specific protocols and referral pathways with external agencies, such as DWP.
- Attend and actively participate in strategic and operational groups across Hampshire to protect and enhance services in the New Forest.
- Attend team meetings of partner agencies to promote the service and early intervention and to provide training on homelessness legislation.
- Establish an updated protocol with Hampshire Social Services for homeless 16-17 year olds and an effective approach to clients with an assessed care need.
- Establish positive working relationships with The Council's Private Sector Enforcement Team, Disabled Facilities Grants Team and link to the Private Sector Housing Strategy in order to prevent homelessness.
- Establish local support networks with Support providers, Advocates, Voluntary Agencies, Community and faith groups to include:
 - Appropriate support to sustain tenancies;
 - Furniture and home start packs;
 - Access to Foodbanks if required;
 - Befriending and support;
 - Help with budgeting, money management, benefits advice and claiming benefits;
 - Support to the 'hidden homeless' who will not engage with statutory services, to obtain housing assistance.
- Establish links with the Credit Union to offer financial products where required.
- Work alongside domestic abuse services, refuges and the Police to assist victims of domestic abuse remain safe.
- Review and propose support arrangements for households with complex needs who need support with daily living.



Strategic priority 3

Ending the use of B&B accommodation through investing in and facilitating the development and use of good quality affordable housing and temporary accommodation

We will:

- Develop in-house emergency accommodation through remodelling of existing stock and property acquisitions as an alternative to Bed & Breakfast accommodation.
- Develop support and processes to successfully move on households to long term accommodation to free up existing temporary accommodation.
- Develop an incentive scheme/ package to encourage households under-occupying in Council housing stock to move to smaller properties.
- Continue with the 'buy back' of ex-council housing stock.
- Adopt an innovative approach to new affordable housing provision, including implementing shared ownership, in addition to social rent to increase the range of products the Council has to offer its residents.
- Identify and optimise council house building capacity through partnerships with Registered Providers and private developers.
- Identify opportunities for the development of Council owned land and garage sites for affordable housing purposes.
- Develop a landlord incentive scheme to attract landlords to work with the Council in providing access to their properties.
- Continue to support the provision of refuge accommodation in the district for victims of domestic abuse.



Strategic priority 4

Bring rough sleeping to an end

We will:

- Respond to reports of rough sleeping within 24 hours and ensure this response adequately engages with rough sleepers.
- Establish a rapid rehousing pathway response to incidents of rough sleeping which incorporates a multi-agency and voluntary sector response.
- Explore the viability of launching a Housing First model of support to the most complex and vulnerable to sustain tenancies.
- Ensure a targeted support approach can be called upon for rough sleepers who have been provided with accommodation to prevent them returning to the streets. This will require 'Navigators' to co-ordinate support services, and provide support, encouragement and advocacy.
- Develop closer links with voluntary and community agencies, such as foodbanks and faith based organisations to promote effective local responses and consistency in tackling homelessness across the New Forest.
- Commit to accommodating people rough sleeping beyond incidents of the severe weather emergency protocol (SWEPE) to ensure a multi-agency approach can be called upon to end their street homelessness.
- Ensure those considered not in 'priority need' receive the same level of advice and assistance as those who trigger the statutory definition.



Monitoring and review

Performance and progress against each of the actions within this strategy will be reviewed annually in conjunction with members and stakeholders.

A transparent annual position statement will be produced to highlight our progress and how effective these measures have been in reducing homelessness and rough sleeping.

As we implement the Homelessness Reduction Act new trends and learning will emerge. We are keen to understand the ongoing impact on our residents and our annual review will incorporate a full statistical analysis of approaches to the service. This will enable us to be responsive in tackling any emerging issues.

New actions and targets may be agreed if further changes are made to national legislation and policy. It is expected the Government will regularly review the impact of the Homelessness Reduction Act and will seek to work more closely with Councils to implement its Rough Sleeping Strategy.

The Portfolio Holder for Housing Services, working with the Executive Head of Governance & Regulation and Service Manager – Housing Options will lead the review of the delivery plan.

In reviewing its strategy annually this council remains committed to embracing amended policy direction and incorporating it within annual updates.

New Forest District Council

Appletree Court, Beaulieu Road, Lyndhurst. Hampshire. SO43 7PN

Email homeless@nfdc.gov.uk • **Web** newforest.gov.uk/housing • **Phone** 023 8028 5234

Self-Referral website including Duty to Refer information

<https://hpa2.org/refer/NEWF> • newforest.gov.uk/housing

 [newforestdc](https://twitter.com/newforestdc)  [newforestgov](https://www.facebook.com/newforestgov)



HOUSING OVERVIEW AND SCRUTINY PANEL – 20 MARCH 2019

PROPOSED HOUSING ALLOCATION POLICY – OUTCOME OF CONSULTATION

1. INTRODUCTION

- 1.1 Following the Council's approval in December 2018 of the proposed new draft Housing Allocation Policy ("the Policy") a statutory consultation exercise commenced. The Policy set out proposed changes to the way the Council allocates social housing within the District. The proposed Allocation Policy can be viewed using the link below:

<http://www.newforest.gov.uk/allocationconsultation>

- 1.2 This report sets out the outcome of the consultation.

2. BACKGROUND

- 2.1 Under s.166A(13) of the Housing Act 1996 before adopting, or making any alterations to a housing allocation scheme that reflects a major change in policy, the Council is required to:

- (a) send a copy of the draft policy, or proposed alterations, to every private registered provider of social housing and registered social landlord with which they have nomination rights; and
- (b) afford them with a reasonable opportunity to comment on the proposals.

- 2.2 Under s.168 of the Act, the Council is required to take reasonable steps to bring the effects of the alteration to the attention of those who are likely to be affected by them. It is accepted good practice to give those who will be so affected an opportunity to comment on the proposed alterations before they are adopted.

3. CONSULTATION

3.1 Process

- 3.1.1 On the 15 January 2019 the Council opened its consultation on the Policy. A consultation document containing a summary of the proposed changes, a link to the Policy and a questionnaire was made available on the Housing Section of the Council's website. A copy of the consultation document is attached at Appendix 1. The consultation ended at 5pm on the 20 February 2019.

- 3.1.2 The following groups were also specifically invited to consult on the Policy:

- (a) All private registered providers of social housing with which the Council has nomination rights;
- (b) All current Homeseach applicants; and
- (c) Statutory, non-statutory agencies and organisations delivering services to vulnerable people in the District.

- 3.1.3 The Service Manager for Housing Options also visited the Job Centre Plus in Ringwood, a Care Leavers' Team Meeting and a Community Mental Health Team Meeting to promote the consultation. A presentation on the Policy was

also given to the Tenant Involvement Group and Homelessness Multi-Agency Forum.

3.2 Outcome

3.2.1 There were 250 responses to the Council's consultation; 88.8% of responses were from current Homeseach applicants. Responses were also received from the following organisations:

- (a) Radian (private registered provider of social housing);
- (b) Ringwood Town Council;
- (c) New Milton Town Council
- (d) Together
- (e) Tenant's Involvement Group;
- (f) The Handy Trust Charity (Youth Service);
- (g) The You Trust; and
- (h) Two Saints

3.2.2 A summary of the responses received, including some of the comments made on the Policy and the Council's responses to them is attached at Appendix 2.

3.2.3 The consultation outcome showed the majority to be in support of the Policy; with 63.1% of respondents confirming that they believed it was correct for the Council to allocate scarce social housing with reference to an applicant's housing need and not only the time spent waiting for an allocation of housing.

4. FOLLOWING ADOPTION

4.1 After adopting a new housing allocation policy the Council has to notify all current housing register applicants of the change and the likely effect of it on their application. Applicants will be invited to re-apply to join the housing register. Once an application is received, it will be re-assessed in accordance with the provisions of the new allocation scheme. The re-assessment period will likely take 3-4 months, during this period work will also be undertaken to procure and implement a new IT system to ensure the efficient re-registration of all applicants. All new applications received after adoption will be assessed in accordance with the provisions of the new allocation policy.

4.2 During the period of re-assessment, the allocation of social housing to existing housing register applicants will continue. Any applicants who apply to join the housing register after adoption but before the Policy goes live will not be able to bid for properties. Any such applicant who is assessed as having an urgent need to move will be assisted separately.

4.3 When the system goes live, all applicants will be notified of their new band under the Policy. All applicants will have a statutory right to seek a review of the decision made on their application.

5. CONCLUSIONS

5.1 The majority of respondents to the consultation have expressed support for the proposed changes to the way social housing is allocated in the District as contained in the Policy. Some comments were made about the impact of the Policy on those who are adequately housed in the private sector. The Policy needs to be read in conjunction with the Council's recently adopted Housing Strategy. In particular, the Council will be developing its own shared ownership scheme which will provide

opportunities for residents who are renting in the private sector to get onto the property ladder.

6. FINANCIAL IMPLICATIONS

- 6.1 In order to better manage the allocation of social housing, the Council has procured a new case management system to replace the paper based system. This will result in more efficient working. The costs are likely to be in the region of £35,000 for year 1 and £8,000 ongoing annually thereafter and will be met from existing budgets.

7. CRIME & DISORDER IMPLICATIONS

- 7.1 There are none.

8. ENVIRONMENTAL IMPLICATIONS

- 8.1 There are none.

9. EQUALITY & DIVERSITY IMPLICATIONS

- 9.1 An Equality Impact Assessment was undertaken at the drafting stage of the Policy. An updated Equality Impact Assessment is attached at Appendix 3.

10. DATA PROTECTION IMPLICATIONS

- 10.1 There are none.

11. RECOMMENDATIONS

- 11.1 That the Housing Overview and Scrutiny Panel consider the response to the statutory consultation and make recommendations to Cabinet as appropriate.

For further information contact:

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Background Papers

Published documents

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PROPOSED CHANGES TO THE ALLOCATION POLICY - CONSULTATION

BACKGROUND TO THE PROPOSED CHANGES:

New Forest District Council (“the Council”) is proposing to change its approach to housing allocation.

WHY IS THE COUNCIL CHANGING ITS ALLOCATION POLICY?

The Council recognised that it needed to undertake a review of its housing allocation policy as a review had not been undertaken since 2012.

Furthermore, in accordance with the Secretary of State’s guidance, the Council needs to review its allocation policy to take into account the new duties to homeless households brought in by the Homelessness Reduction Act 2017.¹

The changes to the Council’s allocation’s policy have been developed with regard to these new duties but have also been influenced by:

- (a) the prevailing housing needs and conditions within its district,
- (b) the results of the work of the Homelessness Task and Finish Group and the Housing Overview and Scrutiny Panel; and
- (c) the desire to ensure that applicant’s on the Council’s housing register are given appropriate priority to enable the Council to make the most effective use of its housing stock.

For a full copy of the Council’s proposed new allocation policy please visit <http://www.newforest.gov.uk/allocationconsultation>

CONSULTATION

A consultation over the proposed changes to the way social housing is allocated starts on 16 January 2019 and will close on 13 February 2019.

The Council is inviting comments on several changes being proposed on who can join the housing register and the way in which housing need is assessed.

¹ Paragraph 2.45 of the Homelessness Code of Guidance 2018

Currently the Council's allocation policy has 4 bands. All applicants, apart from exceptional cases, are placed in Band 3: Priority. The only determining factor thereafter is the length of time the applicant has been on the housing register.

Bands	Number of Households ²
Band 1: High Priority (Urgent)	24
Band 2: High Priority	51
Band 3: Priority	3,120
Band 4: No Priority	207

10 out of 11 applicants on the Council's housing register are in Band 3: Priority. On average there are 300 properties per year that become available for allocation; applicants can wait up to 10 years for an allocation of housing. The current policy does not adequately allow for the allocation of housing on the basis of need.

WHAT WILL BE THE MAIN CHANGES TO THE COUNCIL'S ALLOCATION POLICY

A summary of the main proposed changes that will be introduced with the new allocations policy can be found below:

PROPOSED CHANGE: QUALIFICATION

Applicants will still need to be aged 16 or over and have a local connection as defined under the current allocation policy, but will also need to:

- (a) be in housing need; in that the applicant's housing circumstances fall within one of the proposed new policy's bands;
- (b) have been assessed as lacking the financial means to enable them to resolve their housing need; and

Applicants who do not satisfy the above criteria will not qualify to join the housing register. Furthermore, any applicant who falls within any of the categories below will be classed as non-qualifying to join the housing register:

- (a) are an owner-occupier (with the exception of those with a housing and assessed care need, who cannot resolve their own housing situation and have a need for extra-care or sheltered accommodation);
- (b) have deliberately worsened their circumstances to enable them to qualify onto the housing register; or
- (c) are deemed to be guilty of unacceptable behaviour that is serious enough to make them unsuitable as tenants.

REASONS FOR CHANGE

² Figures correct as at 13 September 2018

The Council believes it is important that there are clear qualifying criteria for joining the housing register that relate to an applicant’s housing need and also their conduct. This will ensure that scarce social housing within the Council’s district is allocated to those who have a genuine need for it and that those who do not have a need for subsidised social housing do not have access to it.

1. Do you agree that the qualification criteria as described above should be introduced?

Yes

No

Don't Know

Comments:

PROPOSED CHANGE: BEDROOM NEED ASSESSMENT

The Council is proposing to change the way it assesses the number of bedrooms that an applicant is entitled to under the allocation policy. The new bedroom need assessment has been set in line with the current regulations affecting bedroom entitlement for the purposes of calculating Housing Benefit and the housing element of Universal Credit.

PROPERTY TYPE/SIZE	HOUSEHOLD
Bedsit	Single Applicant
1 Bedroom	Single Applicant or Applicants living as a couple with no children
2 Bedrooms	Single Applicant, or Applicants living as a couple, with 1 child; or Single Applicant, or Applicants living as a couple, with 2 children of: (a) The same sex under 16 (b) Opposite sex under 10
3 Bedrooms	Single Applicant, or Applicants living as a couple with 2 children, with at least 1 of opposite sex over 10; Single Applicant, or Applicants living as a couple, with 3 children or 4 children: (a) Of the same sex under 16; or (b) Two children of each sex under 16 (c) of either sex all under 10
4 Bedrooms	Single Applicant, or Applicants with 5 or more children Single Applicant or Applicants with 4 children where at least one of them is aged 10 and is of the opposite sex of the others or one of them is aged 16 or over.

REASONS FOR CHANGE

To ensure that the bedroom needs assessment is set in line with current regulations affecting bedroom entitlement; this will avoid issues of affordability and also with our partner landlords who set bedroom entitlement according to the regulations.

2. Do you agree that it is correct to set bedroom need assessment in this way?

Yes

No

Don't Know

Comments:

PROPOSED CHANGE: HOUSEHOLD

The Council proposes to change those who will be included as a member of an applicant's household on their housing application. Only the following groups of people will be treated as a member of an applicant's household:

- The applicant's spouse or cohabitant;
- The applicant's children/dependants aged 35 and under with whom the applicant resides or with whom the applicant might reasonably be expected to reside.

REASONS FOR CHANGE

The Council needs to ensure that applicants are only allowed to include in their housing application those members of their household that would reasonably be expected to reside with them. This is to ensure the effective use of family sized accommodation in the district area.

3. Is it correct for the Council to set household membership in this way so that there is effective use of family sized accommodation the Council's district?

Yes

No

Don't Know

Comments:

PROPOSED CHANGES: HOUSING NEED ASSESSMENT

The Council proposes to introduce a new banding system for prioritising applications for an allocation of housing. The proposed new bands can be found below:

BAND	CRITERIA
Band 1 – Emergency Need for Housing	Applicants: <ul style="list-style-type: none"> (a) Who require a management move: where the applicant has been assessed as having an exceptional need to move by a Senior Officer (b) Who have been assessed as having an urgent health and/or wellbeing need caused or substantially worsened by their home circumstances; (c) Whose accommodation has been assessed as being in a state of emergency disrepair and the hazards cannot be rectified within a reasonable timescale; or (d) Who need to move to escape violence or threats of violence, harassment or a traumatic event in the home.
Band 2. Serious Need for Housing	Applicants: <ul style="list-style-type: none"> (a) Who have been accepted as being owed the full housing duty under the Act and where discharge of duty cannot be achieved by a Private Rented Sector Offer of accommodation; (b) Who are existing social housing tenants under-occupying by 2 or more bedrooms; (c) Who are severely overcrowded (e.g they lack 2 or more bedrooms, or have 2 children who lack a bedroom, such as a single parent with 2 children, where at least one of the children is over the age of 1 in a 1 bed home); (d) Who have been assessed as having a high health and/or wellbeing need caused or substantially worsened by their home circumstance; (e) Who live in a home assessed as being in a state of high disrepair and the disrepair cannot be rectified within reasonable timescales; or (f) Who have been assessed as ready to move on from supported housing in the Council’s district area.
BAND	CRITERIA

<p>Band 3 – Need for Housing</p>	<p>Applicants who:</p> <ul style="list-style-type: none"> (a) Are overcrowded and lack 1 bedroom; (b) Have been assessed as having medium health and/or wellbeing need caused or substantially worsened by their home circumstances; (c) Are certain serving, or former serving members of the regular forces, or their spouse or civil partner; (d) Are homeless, to whom the Council owes a Relief or Prevention Duty under Part VII of the Act; (e) Who need to move under the Right to Move provisions; (f) Are existing social landlord tenants under-occupying their accommodation by 1 bedroom; (g) Have been assessed as not having a permanent home, or are at risk of becoming homeless and are not owed a duty under (d) above; (h) Have been accepted as being owed the full housing duty under Part VII of the Act and where it is possible to discharge duty with a Private Rented Sector Offer of accommodation; or (i) Are key workers where the Council identifies that there is a critical need for the key worker to be rehoused to ensure the availability of an essential public service for the New Forest community.
<p>Band 4 – Lower Need for Housing</p>	<p>Applicants who:</p> <ul style="list-style-type: none"> (a) Have been assessed as having a lower health and/or wellbeing need caused or substantially worsened by their home circumstances; (b) Share essential facilities such as a toilet, bath, shower or kitchen with other households or lack essential facilities; (c) Are households sharing with relatives or friends; (d) Are occupants living in supported accommodation who have not been assessed as ready for move on from supported housing in the Council’s area. (j) Are assured shorthold tenants who do not have the financial means to purchase a property (see Appendix 2: Eligibility and Qualification); or (k) Have been assessed under Part VII of the Act as not in priority need or are intentionally homeless and are still statutory homeless at the point of offer.

With the exception of those who satisfy the rural connection provisions for a rural parish, anyone wishing to join the Council’s housing register will need to have an assessed housing need that falls into one of the 4 bands above.

REASONS FOR CHANGE

Under the Council’s current allocation policy, the main determining factor for an allocation of housing is time spent on the housing register. The Council believes it is important for social housing to be allocated to those who have an assessed housing need.

4. Is it correct for the Council to allocate scarce social housing, where demand far outweighs the supply, with reference to an applicant's housing need in accordance with the new priority bands?

Yes

No

Don't
Know

Comments:

PROPOSED CHANGES: SUSPENSION AND REMOVAL

Suspension:

An applicant will be suspended from the housing register in any of the following circumstances:

Where:

- An applicant has failed to bid on any properties within a 12 month period;
- An applicant has refused 2 offers of accommodation that have been deemed suitable following review, or where no review was lodged, in a 12 month period. This includes all offers made whether by successful bid, direct offer or automatic bid;
- An applicant who is owed a homeless duty and who refuses a suitable offer of accommodation made in discharge of duty owed;
- The Council becomes aware of a change of circumstance which requires re-assessment of housing need;
- An applicant has failed to complete and return a Renewal Request within 3 months of it being sent out;
- The Council receives information that the Applicant is no longer eligible or qualifying to be on the Register;
- The Council receives information that the Applicant has provided false information.

Removal:

An application will be removed from the housing register for the following reasons:

Where:

- The applicant requests that their application be removed;

- The applicant has died;
- The applicant has been rehoused; including where the applicant has accepted an offer of accommodation and lodged an unsuccessful review of its suitability;
- The applicant fails to return a renewal request within 3 months and there are no exceptional circumstances for delay;
- An allegation that an applicant is no longer eligible, qualifying or has provided false information is made out (this includes when this has occurred following the verification stage);
- Following two suspensions within a 12 month period.

REASONS FOR CHANGE

For the better management of the housing register, the Council is proposing to remove or suspend applications if certain circumstances apply.

5. Is it correct for the Council to manage applications on the housing register by suspending or removing applications due to conduct; for example, as outlined above, if an applicant fails to make bids or refuses suitable offers of accommodation?

Yes

No

Don't
Know

Comments:

ANY FURTHER COMMENTS

6. The Council would like to invite you to make any further comments that you would like to be considered regarding the draft policy below.

PLEASE NOTE THE COUNCIL WILL NOT BE MAKING ANY CHANGES TO ITS RURAL PARISH CRITERIA

INFORMATION ABOUT YOU

7. Are you?

A Homesearch Applicant

Elected member

Replying on behalf of an Organisation

If so which one?

Support Worker

Not currently on the Homesearch register

Other

Please state

8. Are you?

A tenant of NFDC

A tenant of another social housing landlord

If so which one?

Private Rented Tenant

Of no fixed abode

Living with friends/family

Other

Please state

HOW TO RETURN THIS FORM

You may email a copy of the form to housing.options@nfdc.gov.uk

You may send a printed copy to:

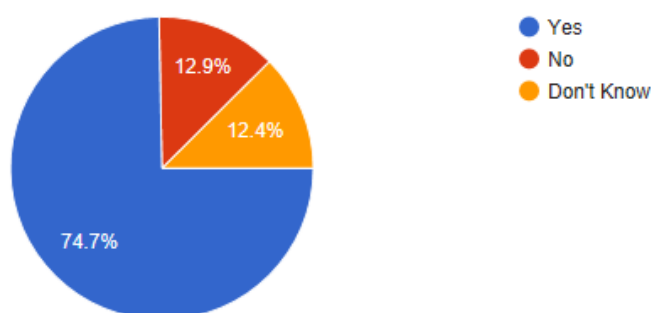
Allocation Policy Consultation
Housing Options
New Forest District Council
Appletree Court
Beaulieu Road
Lyndhurst
SO43 7PA

HOUSING ALLOCATION POLICY - SUMMARY OF CONSULTATION RESPONSES

Proposed Change: Qualification

Do you agree that the qualification criteria as described above should be introduced?

249 responses



COMMENTS: These were some of the comments made by those who agree with the Council's proposals: *"this is a good idea because it will definitely approve (sic) the amount who NEED to be housed..."* and *"I hope this will mean a fairer qualification system"*.

Those who did not agree felt that it would have an unfair impact on applicants who were adequately housed in the private sector but who have been on the waiting list for a number of years: *"I have been on the housing list for 8 years. It would make my life so much easier to have a Council house..."* and *"the time spent waiting for an allocation should not be ignored. It is not fair that people who cannot afford to buy are delayed their right to social housing."* Others felt that those who were in privately rented accommodation who could not afford the rents would be adversely affected: *"I completely disagree, just because we rent privately doesn't mean we can afford it..."*.

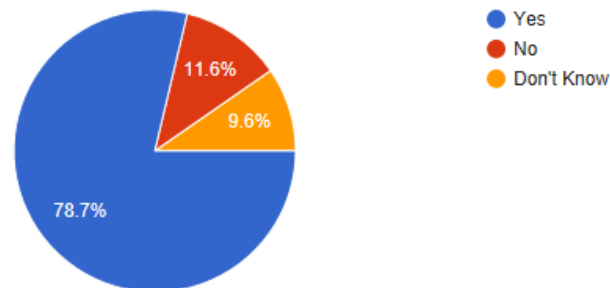
COUNCIL'S RESPONSE: Social housing is not an entitlement or a right but is a scarce resource that the Council has a statutory duty to allocate with reference to housing need. The Council also recognises that it needs to be proactive in creating affordable housing for those in its District. This is the reason why under its newly adopted Housing Strategy it has made a commitment to building more Council housing, at least 600 for the period up to 2026. These will be of differing tenures, including affordable rents and shared ownership schemes. Where appropriate, this will give those who are currently housed in privately rented accommodation an opportunity to get onto the property ladder. It should also be noted that

the Council would not expect those who cannot afford their private rents to remain living in them as any such applicant would come under the statutory definition of homeless.

Proposed Change: Bedroom Need Assessment

Do you agree that it is correct to set bedroom need assessment in this way?

249 responses

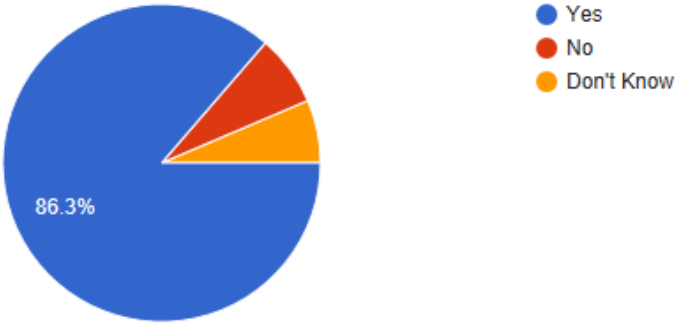


COMMENTS: Some respondents felt that consideration needed to be given to step families or grandparents with grandchildren who came to visit. Some of the comments made were as follows: *“There are circumstances like step children that stay but aren’t classed as living with you, which I think is wrong that they cannot have their own space in the family home when they stay every weekend...”* and *“As a single person I would like the option to have my grandchildren to stay over sometimes, just having one bedroom would not allow me to do this”*. Some respondents felt that it was important for the Council to include extra rooms for carers and those who needed an extra bedroom due to illness/disability.

COUNCIL’S RESPONSE: The Council has to consider how to effectively use its family sized accommodation. There is a great demand for family sized properties and it would not be appropriate to allocate such properties to those applicants who only have an occasional, rather than a full time, need for the extra bedrooms. The proposed new allocation policy makes provision for those who live in carers or who need extra bedrooms due to illness or disability at paragraphs 5.2.3 and 5.3.5.

Is it correct for the Council to set household membership in this way so that there is effective use of family sized accommodation in the Council's District?

249 responses

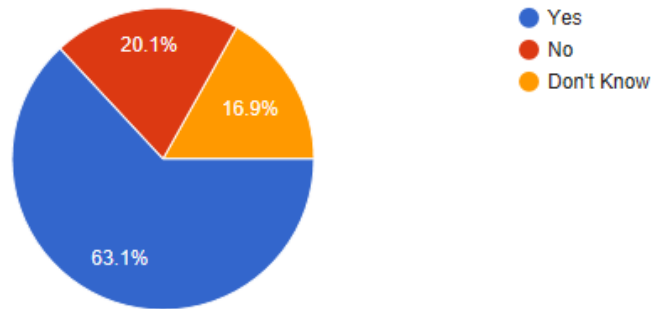


COMMENTS: Respondents felt that it was necessary to take individual circumstances into consideration. Some of the comments made included: *“family circumstances are especially diverse in the 21st century and the lack of affordable housing in the area means that it is not unusual to find adult children living with their parents past the age of 35...”* and *“As I just stated an elderly person might need family help in later life as opposed to going into a home...”*

COUNCIL’S RESPONSE: The Council recognises that there will be circumstances where it will be appropriate to allow children aged over 35 to be included in an applicant’s housing application and where it will be necessary to include other members of the applicant’s extended family in their application, for example elderly relatives. The new draft allocation policy makes specific provision for this at paragraphs 5.3.5 and 7.6.1. The Council took into consideration the age at which an individual would qualify for housing benefit or the housing element of Universal Credit for a self-contained property in their own right, when setting the age of 35 for adult dependants.

Is it correct for the Council to allocate scarce social housing, where demand far outweighs the supply, with reference to an applicant's housing need in accordance with the new proposed priority bands?

249 responses

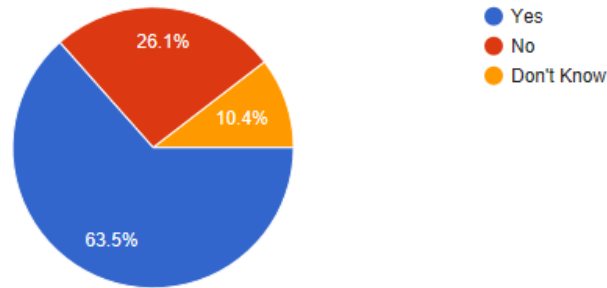


COMMENTS: Those who agreed with the Council's proposals made the following comments: *"Like I said before it isn't fair because there is people who newly join the register needs its (sic) a lot more", "Housing need should be on assessed need, not just on time spent on list (sic)..."* and *"Accommodation should be weighted on need and not time on the list..."* and *"If a person/family have been on the register for X amount of years and a less healthy/more needy person comes forward, the most poorly is more worthy, I would say. I have no problem stepping aside for someone more poorly than me"*. Those who disagreed with the Council's proposal felt the new system would be unfair to those who had been on the list for numerous years but who were adequately housed in the private sector. Some of the comments received included: *"I feel that I have been penalised for continuing to pay private rent through hard work..."*, *"Not if that means people who have been on the list for a long time gets (sic) moved to the back as that's unfair"* and *"Everyone deserves there (sic) chance to get a council property. I think the current way is the fairest..."*

COUNCIL'S RESPONSE: The Council has a statutory duty to allocate social housing with reference to housing need. There is no automatic right or entitlement to social housing. However, the Council recognises that residents need more affordable housing options. In the Council's newly adopted Housing Strategy, the Council has committed to the development of at least 600 new council properties of differing tenures. Where appropriate, this will give families who are currently living in privately rented accommodation an opportunity to get onto the property ladder by way of shared ownership. Some respondents were also concerned that the time they had spent on the waiting list would be lost; however, under the proposed new allocation policy, all current Homeseach applicants will retain their original application date unless their housing need has changed (paragraph 5.4.1 (b)(ii)).

Is it correct for the Council to manage applications on the housing register by suspending or removing applications due to conduct; for example, if an applicant fails to make bids or refuses suitable offers of accommodation?

249 responses



COMMENTS: Some respondents felt that applicants should not be removed for failing to make bids in a 12 month period. In particular, the following was said: *“Months if not a year or more can pass without a suitable property (eg a property with bedroom Nos suitable to the applicant’s family size in the area or within appropriate travelling distance to place of employment...”, “I agree with conduct, but not for not making an application within 12 months, as this can be due to lack of suitable accommodation rather than willingness to apply...”*

COUNCIL’S RESPONSE: Under the proposed new allocation policy, the Council would not remove an applicant for failing to bid within a 12 month period. An applicant may have their application suspended for a period of 6 months if they fail to bid within a 12 month period. However, if an applicant’s application is suspended, they will have a right to request a review of the decision. If they have a justifiable reason for failing to make bids they can request a review of the suspension. The lack of suitable properties in this period would be considered as part of this review. Any decision made by the Council on an applicant’s housing application can be reviewed on the applicant’s request. The reviews process can be found at paragraph 7.5 of the draft allocation policy.

COMMENTS FROM GROUPS:

RADIAN (a private registered provider of social housing within the Council’s) agreed with all the proposed changes, but felt that it was necessary to provide limits when undertaking the financial assessment as other Councils had done.

COUNCIL’S RESPONSE: The Council felt it was not appropriate to set financial limits but that it was important to have the flexibility to treat each individual case on its own merits.

The Council has specifically excluded from qualification those who have the financial resources to afford to purchase a property.

THE TENANT INVOLVMENT GROUP: felt that allocations need to be judged on a case by case basis, that there should be justification for the “35 years old” limit for dependants, that there needs to be an appeal process and that banding for exceptional need should be a decision for more than 1 Officer. They also felt that families should be assessed for extra bedrooms if their children are nearing the age criteria to avoid having to move to another property shortly afterwards. They considered that it was necessary to consider community cohesion and children being settled into local schools when assessing the need for bedrooms.

COUNCIL’S RESPONSE: The Council has a discretion that will allow it to treat each individual case on its own merits; including if appropriate, for a family to be assessed as needing an extra bedroom because their children are nearing the age criteria for an extra bedroom (paragraph 7.6); the Council has set the dependant age limit to 35, with reference to when an individual qualifies for housing benefit or the housing element of Universal Credit for a self-contained property in their own right. There is a right of review of any decision that the Council makes on an application (paragraph 7.5).

RINGWOOD TOWN COUNCIL: Councillors felt that the Household criteria needed to reflect that some families may have adult children with disabilities, that the Rural Connection should also apply to towns and felt that people may be removed for refusing “suitable accommodation” which was at a distance from an area in which they had a connection and in which they needed to remain.

COUNCIL’S RESPONSE: The Council has the discretion to include other family members in an applicant’s household if appropriate; this would allow a child over 35 with a disability to be included in an applicant’s household (paragraph 7.6 and 5.3.5). The Council considers that the specific characteristics of rural parishes provides for a justification to have local connection criteria; however, it would not be manageable to apply such criteria to all towns within the District area. All applicants have the right to request a review of a decision made on their application. Accordingly, any applicant who had refused accommodation because it was not suitable would be able to provide their reasons for refusal (including distance from an area in which they needed to remain) and would have the ability to have those reasons considered.

NEW MILTON TOWN COUNCIL: It was suggested that it would be appropriate to move those who were under-occupying social housing by 1 or more rooms into Band 2. It was also felt that those who were homeless (whether or not owed duties under Part VII of the Housing Act 1996) should be in Band 1 or 2; particularly as the Armed Forces Covenant may apply to them. It was also suggested that it was necessary to take into consideration medical reasons for anti-social behaviour when deciding whether or not an applicant should qualify to join the housing register.

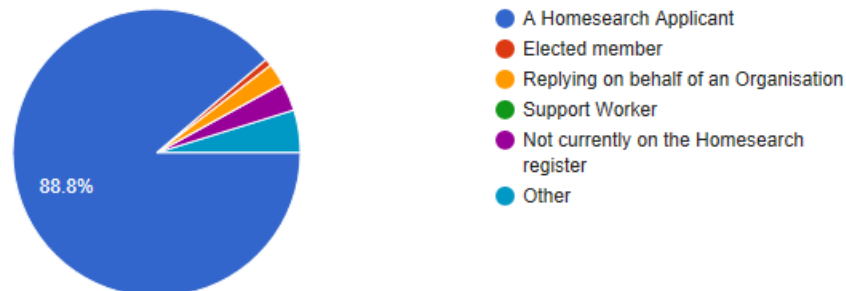
COUNCIL’S RESPONSE: The Council needs to set priorities for those who have a housing need. Those in Band 2 have been assessed by the Council as having a serious housing need; in particular those who are under-occupying by 2 bedrooms will have a greater need to be rehoused than those who are only under-occupying by 1 bedroom. The Council has placed only those to whom it has a statutory duty to secure alternative housing within Band

2. Those who are in the armed forces have a special category within Band 3; any such applicant who satisfies the criteria of Band 1 or 2 will be placed into those bands. At paragraph E(3)(ii) of Appendix 2: Eligibility and Qualification, the Council states that applicants will qualify to join the housing register if they demonstrate a commitment to improving their behaviour. Provision has also been made to ensure that individual circumstances (which would include medical causes for behaviour) are taken into consideration when determining whether someone qualifies to join the housing register due to unacceptable behaviour (paragraph E(4) of Appendix 2).

Information About You

Are you?

249 responses



If from an Organisation or other, please state below which one

13 responses

Together

The You Trust

The Handy Trust Charity (Youth Service)

Acts 4 Sharing

Radian

I am my son's appointee. My son is on the register.

Agreed comments from Tenant Representatives who attended the TIG meeting on 8.2.19

NFDC Employee

I am a volunteer for St Thomas's Good Samaritans group in Lymington but completed the form as an individual, not a representative of the group.

New Milton Town Council

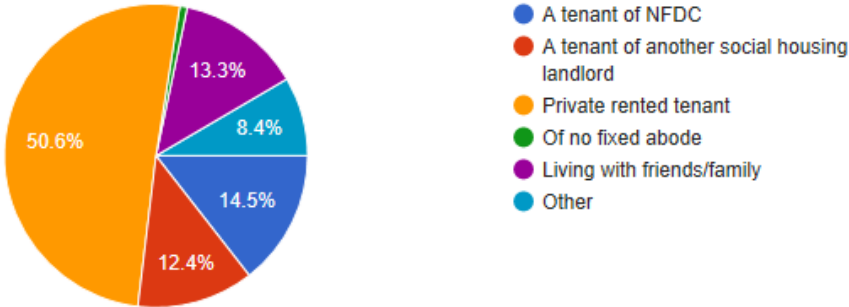
Two Saints Limited

14426

mother of an applicant

Are you?

249 responses



Equality Analysis

Proposed policy/decision/business plan to which this equality analysis relates	Housing Allocation Policy
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Brief Description of policy/decision/business plan

Under s166A of the Housing Act 1996 (as amended) New Forest District Council is required to produce a housing allocation scheme which sets out details on how housing applications will be assessed, processed and how decisions will be made.

The demand for social housing within the Council's district far outweighs the supply. The government expects that social housing should go to people who genuinely need it; including those that the government has identified with high levels of assessed housing need who are referred to as the "reasonable preference group"¹, but also expects that the Council be given the freedom to meet local priorities.

The aims and objectives of the Council's housing allocation policy is:

To ensure the allocation of social housing in a fair and transparent manner, with the aim of using the Council's scarce housing resources appropriately, and in particular, to enable the Council to meet:

- a. Its prevention and homelessness statutory duties;
- b. the housing needs of those that are most vulnerable;
- c. the need to allocate housing with reference to the prevailing housing conditions and needs within its district; and
- d. its statutory obligations as set out in Part VI of the Housing Act 1996;

¹ Includes statutory homeless applicants, owed duties under homelessness legislation, are occupying insanitary or otherwise living in unsatisfactory housing conditions, those who need to move on medical or welfare grounds (including disability) and those who need to move to a particular locality within the district where failure to do so would cause hardship (to themselves or others).

Relevant Data, Research

The Council has used the data available from its current housing register as set out in the table below to assess the impact of the proposed changes to the Council's Allocation's Policy on those with a protected characteristic.

As at the 8th March 2019, there were 3239 households registered on the Council's housing register. Of those the following information is known:

Age Groups	Numbers
40+	70
45+	266
55+	153
60+	175
65+	398

Ethnic Groups	Numbers
African	14
Asian	12
British White Anglo	3027
Caribbean	2
European	57
Irish	2
Middle Eastern	2
Mixed	4
Oriental	7
Non White (Other)	135

Household Make Up	Numbers
Single Parent Families	685

The Council is committed to ensuring that it monitors its compliance with its duties under the Equality Act 2010; in particular, it notes that there is a need to ensure that data is collected to enable the Council to identify how the provisions within its allocation policy is impacting on certain protected characteristic groups, particularly by gender, those with disabilities and specific BME categories not restricted to colour. Periodic reviews with updated data will be required after the proposed new Allocation Policy is adopted.

Equality Analysis

In assessing the potential equality implications, the Council will consider the impacts (both positive and negative) on the groups with protected characteristics and any mitigating actions to be taken, or where appropriate, the reason why a provision is the most proportionate means of achieving the Council's objectives.

Age:

Where this is referred to, it refers to a person belonging to a particular age (ie 35 year olds) or range of ages (ie 18-30 year olds)

Potential Impacts (positive and negative) of proposed policy/decision/business plan

Whilst the main proposed changes to the Council's Allocations Policy are likely to have a neutral impact on this protected characteristic group, the introduction of an online application process may have an impact on older applicants.

Further, whilst not a change, the Council recognises that the Incentive to Work provisions are likely to have an impact on both older and younger applicants.

- Online Application Process: In 2018, whilst almost all adults aged 16 - 34 and were recent internet users (99%)², it is recognised that those aged 75+ are not regular internet users (only 44%)³; however, in 2018 statistics from the Office of National Statistics show that there has been an increase in internet use by those who are aged 65-74 to 80% in 2018⁴. This shows a steady increase of internet use for those aged 65+. Applicants aged 65+ represent 12% of applicants on the Council's housing register.
- Incentive to Work: It is accepted that some older applicants will be unable to satisfy the Incentive to Work provisions; However, many older people are now working beyond retirement age and further the Incentive to Work provision recognises community contribution, for example voluntary work in which older people will be able to equally participate. There is currently a decline in youth unemployment rates down to 464,000 for those aged 16 -24 in June – August 2018⁵; however, it is recognised that this group may also be negatively impacted by the Incentive to Work provisions.

Mitigating Actions to be Taken and/or Justification

- Online Application Process – the Council's objective in this provision is to provide for the efficient processing of applications for housing within its district area. There is an indication that elderly applicants who are aged 75+ will likely have the least access to internet facilities; however, the Council notes that this age group will likely be seeking extra care housing and will have support in place to ensure that online applications can be made. Furthermore, the Council has installed computers in both its main and satellite offices to provide for greater access to internet facilities. There are also free internet facilities in libraries and most elderly applicants will likely to have family or other support in place to assist them in making applications. The Council Housing Options teams contact details are accessible to members of the public and on the Allocation Policy and can be contacted for support or referral to a support agency, such as Age UK who provide significant support to elderly applicants. Finally, the Council recognises the need to monitor applications being made, and if necessary, will ensure that appropriate steps are taken if there is evidence of a decline in representation of applications from those in these age groups as compared to the current representation.

² <https://www.ons.gov.uk/businessindustryandtrade/itandinternetindustry/bulletins/internetusers/2018>

³ Ibid

⁴ Ibid

⁵ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN05871>

(Protected Characteristic: Age) Mitigating Actions to be Taken and/or Justification (continued)

- Incentive to Work: The government has made clear that it wishes local authorities to provide incentives for applicants to work or make a positive contribution to the local community.⁶ The Council has introduced this provision to achieve this objective and whilst it recognises that there might be a negative impact on certain age groups (the young and the elderly) it considers that this initiative is the least intrusive and strikes the most proportionate balance between the objective identified and the need to avoid adverse impacts on those with this particular protected characteristic. The Council will continue to collect data to monitor how this provision is impacting on those in this protected characteristic group and make appropriate changes if necessary.

Disability:

A person has a disability if s/he has physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities.

Potential Impacts (positive and negative) of proposed policy/decision/business plan

The Council already takes steps to ensure that when an applicant registers to join its scheme they are given an opportunity to specify any disability needs and requirements for particular housing. Through the Council's choice based bidding process, vacancies are described in sufficient detail to enable those with a disability to make informed decisions so that they bid for those properties that are best suited for their needs. Where appropriate the Council also makes direct offers to ensure that adapted properties are allocated to those with disability needs.

The Council recognises that it will need to ensure that data is collected to enable it to provide better monitoring of how its policies are impacting on those who have the protected characteristic of disability.

The Council acknowledges that some of its measures will have a negative impact on those who have a disability as follows:

- Online Application Process: Whilst there is likely to be a neutral impact on those with a physical health disability (as they will still be able to access internet facilities at home and in public spaces (library and at the Council offices) it is likely that there will be a negative impact on those with mental health disabilities.
- Incentive to Work: There are an estimated 3.8 million people of working age (16-64) with disabilities in employment. In April – June 2018, an employment rate of 50.7%. The employment rate of people without disabilities is 81.1%. During that period, people with a disability had an unemployment rate of 8.8% as compared with 3.4% of people without disabilities⁷. In light of this

⁶ Paragraph 4.27 of the Allocation of Accommodation: Guidance for Local Housing Authorities in England.

⁷ <https://researchbriefings.parliament.uk/ResearchBriefing/Summary/CBP-7540>

(Protected Characteristic: Disability) Potential Impacts (positive and negative) of proposed policy/decision/business plan (continued)

information, it is likely that the Incentive to Work provisions will have an adverse impact on those with a disability. However, the Incentive to Work provisions do recognise community contribution, for example by voluntary work which would enable those with disabilities to take advantage of this provision. It is recognised that those with mental health issues are often encouraged to take up voluntary work⁸.

Suitable Accommodation: Those with disabilities will more likely require specific accommodation that adequately takes into consideration their disability needs. General needs accommodation may need to be adapted to make it suitable for those with disability needs.

Mitigating Actions to be Taken and/or Justification

- Online Application Process: Online applications are a means by which the Council can ensure the efficient management of applications for those seeking to join the Council's housing register. The Council provides contact details for the Housing Options team on the Housing Allocation Policy and partner agencies, such as the Citizens Advice Bureau also have access to the Council's contact details. The Housing Options team can provide assistance to those who have no alternative means of accessing the applications online and/or refer applicants to an advice agency, such as Two Saints, and where appropriate, advocacy services through Solent Mind.

- Incentive to Work - The government has made clear that it wishes local authorities to provide incentives for applicants to work or make a positive contribution to the local community. The Council has introduced this provision to achieve this objective and whilst it recognises that there might be a negative impact on those with a disability, it is considered that by ensuring that this provision can be satisfied by those who are making a community contribution, for example by voluntary work, it is striking a proportionate balance between its identified objective and minimising the adverse impact on those with this protected characteristic. The Council also recognises that it will need to monitor the number of applicants on its housing register who are disabled and who qualify for this provision and where appropriate make changes as may be required to minimise an adverse impact on them.

Suitable Accommodation: The Council employs an occupational therapist who, where appropriate, will inspect the suitability of accommodation when an allocation is made. Furthermore, the Council prioritises applicants who have a disability for specific types of properties, such as adapted properties and bungalows. It will also make direct offers where appropriate to ensure that these properties go to those who have most need for them.

Gender Reassignment

The process of transitioning from one gender to another.

Potential Impacts (positive and negative) of proposed policy/decision/business plan

Whilst the policy changes will have a neutral impact on this protected characteristic group, the Council recognises that its Incentive to Work may have an impact on transgender applicants.

⁸ <https://www.nhs.uk/conditions/stress-anxiety-depression/give-for-mental-wellbeing/>

Potential Impacts (positive and negative) of proposed policy/decision/business plan (continued)

- Incentive to Work – It is recognised that transgender applicants are particularly at risk of housing crisis and homelessness arising from transphobic reaction by family, neighbours and members of the community. This may make it difficult for them to obtain work or undertake formal voluntary work.

Mitigating Actions to be Taken and/or Justification

- Incentive to Work - The government has made clear that it wishes local authorities to provide incentives for applicants to work or make a positive contribution to the local community. The Council has introduced this provision to achieve this objective. Further, applicants who are made homeless through a hate crime can be placed within the higher bands of the allocation scheme, thus improving their prospects of rehousing without the need to be engaged in work, whether voluntary or otherwise.

Marriage and Civil Partnership

Marriage and civil partnership is the legal recognition of a relationship.

Potential Impacts (positive and negative) of proposed policy/decision/business plan

There are no specific issues that it is believed would discriminate or disadvantage married couples or those in a civil partnership.

Mitigating Actions to be Taken and/or Justification

None identified, however, it is recognised that continued monitoring will need to be undertaken to ensure there are no adverse impacts on those in this protected characteristic group.

Pregnancy and Maternity

Pregnancy is the condition of being pregnant or expecting a baby. Maternity refers to the period after birth, and is linked to maternity leave in the employment context. In the non-work context, protection against maternity discrimination is for 26 weeks after giving birth, and this includes treating a woman unfavourably because she is breastfeeding.

Potential Impacts (positive and negative) of proposed policy/decision/business plan

The Council do not take into consideration unborn children which may impact on applicant's ability to be considered for larger sized properties during their pregnancy.

Mitigating Actions to be Taken and/or Justification

Whilst it is recognised that pregnant women may feel disadvantaged by the Council's policy to not take into consideration unborn children, the Council's objective in doing this is to ensure that it is able to effectively manage its stock given the demand on family sized accommodation and also to ensure compliance with the Welfare Reform Act 2012⁹, to avoid affordability issues for under- occupiers.

⁹ Paragraph 4.22 of the Allocation of accommodation: guidance for local housing authorities in England.

Race:

Refers to the protected characteristic of Race. It refers to a group of people defined by their race, colour and nationality (including citizenship), ethnic or national origins.

Potential Impacts (positive and negative) of proposed policy/decision/business plan

Whilst the main proposed changes to the Council's Allocations Policy are likely to have a neutral impact on this protected characteristic group, the local connection provisions may have an impact on those of certain ethnic groups, including members of any BME groups, particularly blacks, Indian, EEA nationals and travellers.

From the 2011 Census, 97% of the Council's residents were within the "White British" ethnic group. Of other residents, 0.2% identified as being from the Gypsy or Irish Traveller community, 0.9% as being of a mixed ethnicity, 0.9% as Asian British and 0.3% as being Black British¹⁰. It is recognised that in particular travellers as part of their cultural identity need to have free movement and the local connection provisions will have an impact on those in this particular group. The majority of residents in the District were born within the UK (94%) with only a minority born outside the UK: 2.1% born in Europe, 1.3% in the Middle East, 1.1% in Africa and 0.8% in The Americas, the Caribbean and Oceania¹¹; suggesting that some BME residents might have moved to the District from abroad and be affected by the local connection criteria. The Council also recognises that those who have had to flee their own country of origins and seek asylum in the United Kingdom will be impacted by the Council's local connection provisions.

Mitigating Actions to be Taken and/or Justification

- **Local connection:** The Council has set 2 years or 10 years previously as its local connection criteria for residence. However, it also recognises employment within the Council's district and has set exceptions to those who will have to satisfy the local connection criteria. The Council's approach is a proportionate means of enabling the Council to achieve the objective of promoting local priorities when allocating social housing within its district whilst minimising negative impacts on those who have these protected characteristic. Furthermore, the Council has a residual discretion as set out in the policy to enable it to dispense with any of the provisions of the policy in exceptional circumstances, and in particular, where failing to do so would be in breach of the Council's duties as contained in the Equality Act 2010. Accordingly, when making decisions as to whether discretion should be exercised, the Council will be focused on the need to ensure compliance with its duties under the Equality Act 2010 to those who fall within these protected characteristic groups. It is recognised that continued monitoring will need to be undertaken to ensure there are no adverse impacts on those in these protected characteristic group. In particular, better data will need to be collected from applicants to monitor the impact of the local connection provisions on those with these protected characteristics.

¹⁰ https://www.nomisweb.co.uk/reports/localarea?compare=E07000091#section_6_4

¹¹ http://www3.hants.gov.uk/2011_census_new_forest_summary_factsheet.pdf

Sex:

A man or a woman.

Potential Impacts (positive and negative) of proposed policy/decision/business plan

Gender is an issue in relation to economic status with women being adversely impacted. Generally, women experience lower levels of economic activity than man.

The local connection provisions may also impact on women who are more likely to be fleeing domestic abuse and therefore not be able to satisfy the Council's criteria.

Mitigating Actions to be Taken and/or Justification

- Incentive to Work: The government has made clear that it wishes local authorities to provide incentives for applicants to work or make a positive contribution to the local community. The Council has introduced this provision to achieve this objective and whilst it is recognised that there might be a negative impact on women who are not working (for example because of childcare reasons); it is noted that there has been an increase in women in work for the last 40 years¹². The Council also recognises local community contribution which women would also have the ability to participate in, for example volunteering in schools. Further, it considers that this initiative strikes the most proportionate and least intrusive measure to strike a balance between the objective identified and the need to avoid adverse impacts on those with this particular protected characteristic.
- Local Connection: The Council has set 2 years or 10 years in the past as its local connection criteria for residence. However, it also recognises employment within the Council's district and has set exceptions to those who will have to satisfy the local connection criteria; including for those owed duties under Part VII of the Housing Act 1996. The Council's approach is a proportionate means of enabling the Council to achieve the objective of promoting local priorities when allocating social housing within its district whilst minimising negative impacts on those who have this protected characteristic. Furthermore, the Council has a residual discretion as set out in the policy to enable it to dispense with any of the provisions of the policy in exceptional circumstances, and in particular, where failing to do so would be in breach of the Council's duties as contained in the Equality Act 2010. Accordingly, when making decisions as to whether discretion should be exercised, the Council will be focused on the need to ensure compliance with its duties under the Equality Act 2010 to those who fall within this protected characteristic group. It is recognised that continued monitoring will need to be undertaken to ensure there are no adverse impacts on those in this protected characteristic group.

¹²<https://www.ons.gov.uk/employmentandlabourmarket/peopleinwork/employmentandemployeetypes/articles/womeninthelabourmarket/2013-09-25>

Sexual Orientation

Whether a person's sexual attraction is towards their own sex, the opposite sex or both sexes

Potential Impacts (positive and negative) of proposed policy/decision/business plan

The policy will have a neutral impact on those in this protected characteristic group.

However, the Council recognises that it needs to maintain and collect accurate data that will enable it to monitor how its policies are impacting those with this protected characteristic.

Mitigating Actions to be Taken and/or Justification

None identified

Religion and Belief

Religion has the meaning usually given to it but belief includes religious and philosophical beliefs including lack of belief (Atheism). Generally, a belief should affect your life choices or the way you live it to be included in the definition.

Potential Impacts (positive and negative) of proposed policy/decision/business plan

The policy will have a neutral impact on those in this protected characteristic group.

However, the Council recognises that it needs to maintain and collect accurate data that will enable it to monitor how its policies are impacting those with this protected characteristic.

Mitigating Actions to be Taken and/or Justification

None identified

Further Action

It is noted that in order to ensure accurate monitoring of the impact of its allocation policy on those with a protected characteristic, the Council will need to collect full and accurate data for those who are applying to join its register and also those who are being allocated accommodation by it. In particular, in relation to areas surrounding the Incentive to Work, Local Connection and Online Applications.

The Council will also need to ensure that it undertakes appropriate Equality Analysis whenever, it sets Local Lettings Policies or it applies sensitive lettings provisions.

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HOUSING OVERVIEW & SCRUTINY PANEL WORK PROGRAMME 2019/2020

ITEM	OBJECTIVE	METHOD	LEAD OFFICER
19 June 2019			
Housing Strategy / HRA Property acquisition update	To receive an update on the progress of the Housing Strategy and HRA property acquisition	Update to Panel	Tim Davis
Draft Housing Asset Maintenance Strategy	To consider the draft Housing Asset Maintenance Strategy	Report to Panel	Ritchie Thomson
Draft Maintenance Policy	To consider the draft housing maintenance policy	Report to Panel	Ritchie Thomson / Richard Fudge??
Shared Ownership Scheme	To consider the Shared Ownership Scheme	Presentation to Panel	Grainne O'Rourke
Private Sector Housing Task and Finish Group update	To receive an update on the progress of the Private Sector Housing Task and Finish Group	Oral update to Panel	Grainne O'Rourke
18 September 2019			
Housing Strategy / HRA Property acquisition update	To receive an update on the progress of the Housing Strategy and HRA property acquisition	Oral update to Panel	Tim Davis
Policies – Gas Safety, electrical safety, lifts and lifting equipment and legionella (or possibly at a later meeting)	To consider policies relating to gas safety, electrical safety, lifts and lifting equipment and legionella	Reports / presentation to Panel	Ritchie Thomson
15 January 2020			
Housing Strategy / HRA Property acquisition update	To receive an update on the progress of the Housing Strategy and HRA property acquisition	Update to Panel	Tim Davis

ITEM	OBJECTIVE	METHOD	LEAD OFFICER
18 March 2020			
Housing Strategy / HRA Property acquisition update	To receive an update on the progress of the Housing Strategy and HRA property acquisition	Update to Panel	Tim Davis