

DRAFT

Homelessness and
Rough Sleeping
Review and Strategy

2019 - 2024

Forward by Housing Portfolio Holder

Welcome to the Council's new Homelessness and Rough Sleeping Review and Strategy for 2019-2024.

This is East Herts' fourth Homelessness Strategy and sets out our approach for tackling homelessness in the District.

The Strategy aims to prevent homelessness and ensure that accommodation and support is available for people who become homeless within the District.

Homelessness and poor housing conditions blight lives, damage health and reduce opportunities. They negatively impact communities in significant ways. That is why preventing homelessness is a priority for this Council. We are committed to ongoing investment that delivers tangible benefits to the people we serve.

I believe this Strategy sets out key objectives and provides the framework to enable us to deal with homelessness, clearly setting out the Council's approach and commitment to tackling this issue over the next 5 years.

The Strategy will concentrate on 4 key objectives:

1. Strong and effective partnership working
2. Early targeted intervention and advice to prevent the loss of accommodation
3. Effective action to relieve homelessness and sustain tenancies to prevent repeat homelessness
4. Protect and increase local housing options

I would like to extend my thanks on behalf of the Council to everyone who has been involved in developing this Strategy.

Councillor Jan Goodeve

Housing Portfolio Holder

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1.0 Introduction

The Homelessness Act 2002 introduced a requirement for local authorities to undertake a review of homelessness, including consultation, and to use the results of the review to inform a homelessness strategy.

The Homelessness and Rough Sleeping Review and Strategy for 2019-2024 (the Strategy) sets out how the Council aims to prevent homelessness and ensure that accommodation and support is available for people who become homeless within the District. 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.

The Strategy is consistent with the Council's current over-arching Housing and Health Strategy 2016-2021 that seeks to improve the availability of suitable housing for local residents, including affordable rented housing that meets a range of locally identified needs.

The Strategy also contributes to the Council's Corporate Strategic Plan 2016-2020 and achievement of the Council's three Corporate Priorities of:

1. Improve the health and wellbeing of our communities;
2. Enhance the quality of people's lives;
3. Enable a flourishing local economy.

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 year and following four years.

Working in partnership is key to the success of the strategy. The Strategy has been developed in consultation with key partners following a review of homelessness in East Herts and takes into account recent developments in housing legislation. This year we will establish a multi-agency forum of statutory agencies and local organisations to assist us in our efforts to tackle homelessness.

2.0 Successes 2013-2018

Through the previous Homelessness Strategy and Action Plan 2013-2018 the Council and its partners have achieved a number of successful outcomes and improvements to services for homeless persons in East Herts.

Housing Options Team

In January 2018, in anticipation of the implementation of the Homelessness Reduction Act 2017 in April 2018, the Council re-structured the Housing Options Team to provide additional resources into the prevention and relief work of the team. In addition we used the 'New Burdens' grant from Government to fund an additional Senior Housing Options Officer for a period of two years to ensure there were sufficient resources to deal with the anticipated increase in caseloads and to monitor the workload of the prevention and relief officers.

Debt and Money Advice

The Council funded, and continues to provide funding to, East Herts Citizens Advice for the provision of specialist Debt Advice from within the Housing Options Service through a three year Service Level Agreement. The provision is for two days a week in Hertford and Bishop's Stortford.

Homeless Prevention

Overall the Council prevented 263 households from becoming homeless in 2017/18 and 291 households in 2016/17.

The Council uses the Government's Homeless Prevention Grant flexibly to help prevent homelessness e.g. spend to save payments, paying rent in advance, payments for landlord fees and providing loans to pay off small arrears. In 2017 twenty seven households (14% of the total preventions) had their homelessness prevented as a result of obtaining private sector rented accommodation with assistance from the Council with their deposit and rent in advance. In 2016 the figure was 42 (15% of the total prevention) households. This reduction reflects the increased difficulty in accessing the private rented sector for households on a low income.

The Council also has an agreed Service Level Agreement with Herts Credit Union to provide interest-free loans to applicants requiring rent in advance. Part of the agreement is that the Council also pays for the applicant to become a member of Herts Credit Union.

The Council funds, £5,000 each year, to the Schools Intervention Project run by Herts Homeless Group. The project provides lessons through the Personal, Social and Health curriculum to 14 to 15 years olds on the realities of homelessness and is very well received by the schools that make repeat bookings each school year.

Supported Accommodation

The Council supported, by the provision of land, the building of a new young persons supported accommodation scheme in Hertford by Aldwyck Housing Association. The scheme provides onsite 24 hour supported accommodation for 28 young persons aged 16- 24 in fourteen flats and was completed in October 2012. The Council and Herts County Council work closely together on the referral of young vulnerable people into the accommodation.

New Homes

The Council places a high priority on supporting and enabling the development of new additional affordable and supported housing by housing associations. In 2017/18 there were 162 new affordable homes completed in the District (200 in 2016/17) and the estimate is for over 200 new affordable homes to be completed in 2018/19.

Best Use of existing Homes

In 2017 the Council carried out a piece of work to identify under-occupation in both the social and private housing markets. We worked with our local housing associations to identify the level of under-occupation in their homes and review the strategies and policies to address under-occupation to make the best use of the homes available. The aim is to ensure current tenants are in the homes that best suit their household, make larger homes available to overcrowded households and where a household is affected by welfare reform make their home more affordable to them. Following on from the review two new housing schemes have been developed that have been targeted at older under – occupying households.

Joint working

A Joint Housing Protocol for homeless 16/17 year olds and care leavers was drafted and agreed between all 10 Hertfordshire District's and Borough's housing services and Herts County Council. Countywide joint training was carried out and updates continue to be incorporated as additional legislation becomes operational.

A Joint Housing Protocol for Intentionally Homeless families has also been drafted and agreed between all 10 Districts and Boroughs housing services and the County Council .

3.0 National context

Since the implementation of the previous Homelessness Strategy, there have been significant changes in Housing Policy at a national level.

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 now stand 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%).

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 the Members of Parliament within Government sought to redress the situation and proposed improvements to the legal framework to prevent and tackle single homelessness more effectively.

Legal Framework for Homelessness

Within a complex legal framework the Council delivers services to people who are homeless or threatened with homelessness. This framework sets out duties it must perform and powers it can exercise with discretion.

The Housing Act 1996, Part 7 has been amended over the years, but remains the primary legislation prescribing how local authorities should deliver services, and what duties they must owe to homeless persons.

The Housing Act 1996, Part 7 has recently been amended by the Homelessness Reduction Act 2017. This new Act represents fundamental amendments to the existing homelessness legislation. It introduces new requirements to “prevent” and “relieve” homelessness and in that context, sets out a range of new duties. It was introduced to strengthen and increase the duties owed to all eligible homeless applicants, including those who do not have a priority need for accommodation or who may be intentionally homeless.

The following new duties have been introduced under the Act:

- Duty to assess the housing circumstances, housing needs and support needs of all eligible applicants who are homeless or at risk of becoming homeless within 56 days and agree the steps that need to be taken by the applicant or the authority to ensure that they can remain in their current accommodation or can secure and sustain suitable alternative accommodation;
- Duty to assist all eligible applicants who are at risk of becoming homeless within the next 56 days to remain in their current accommodation or secure and sustain suitable alternative accommodation for a period of at least 6 months;
- Duty to assist all eligible homeless persons to secure and sustain suitable accommodation for a period of at least 6 months ;
- Duty on specified public bodies to refer households who are homeless or threatened with homelessness to a housing authority.

The Welfare Reform and Work Act 2016: The Government has introduced a range of welfare reforms as part of its austerity plan. This Act introduces measures that are likely to have an impact upon low income households:

- The maximum amount that a non-working, non-disabled household can receive in state benefits has reduced to £20,000 a year (£13,400 a year for a single adult) outside London;
- A reduction in social housing rents of 1% per year over four years from April 2016.

The Deregulation Act 2015: Some of the measures introduced under the Deregulation Act 2015 were designed to increase the rights of Council and Private Tenants:

- Reduction in the minimum length of time before a Council Tenant acquires the Right to Buy their home from 5 to 3 years;
- Requirement for Private Sector Landlords to provide all new tenants with prescribed information about their rights and responsibilities, Energy Performance and Gas Safety certificates and requirement to protect all tenancy deposits in a Government approved redress scheme ;
- Banning of retaliatory evictions by Private Sector Landlords, meaning that a Section 21 notice cannot be served in response to complaints made by a tenant about disrepair, health and safety or energy performance in a property.

Rough Sleeping Strategy: 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 2017 showed a 169% increase on the figures for the same count in 2009/10, with a further 617 people sleeping rough than in 2016. The figure of 4,751 represented an increase of 15% on the previous year.

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.

4.0 Local context

The District consists of the 5 market towns of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware. There is also a significant rural hinterland with many villages and hamlets.

East Herts is a high value and high demand area for market and affordable housing. The average house prices in the District are around 25% higher than the national average. In East Herts the average house price is around £325,000 according to the National Housing Federation, just over 13 times the average income for the District. This puts pressure on stock availability and turnover of all tenures.

In the District there is a huge salary spectrum; 21.4% of households earn below £20,000 well below the national average of £27,000 (East Herts Housing Needs Survey, 2015). Shared Ownership properties provide an opportunity to access market housing but the affordability of this is also related to location and size of property. The Housing Needs Survey (HNS) showed that 25.2% of concealed households have no savings and 90.9% have less than £25,000 which is a barrier to moving out. Households have a low level of funds available to pay rent or mortgage per month with 48.4% willing to pay between £451 and £550pcm (HNS, 2015). This does restrict the housing market available to them significantly.

The rental market is a key tenure of both private rent and affordable rent for residents and there is a good range of stock sizes and locations. The private rental sector is experiencing pressure as demand grows from those who wish to be flexible with their living arrangements and who do not have the funds to access for sale/shared ownership properties. Rental rates are increasing in both the private and affordable sector. In the social housing sector, affordable rent is up to 80% of open market rent and this can be an issue in high price areas for prospective tenants. In private rent there is an increase in the number of households who do not require housing benefit and therefore there are a falling number of landlords willing to accept households in receipt of housing benefit which puts pressure on the Housing Service to provide support.

Review of Homelessness

A review of homelessness within East Herts was carried out to help inform this Strategy. The first contact with the Council, for the majority of households in housing need, is a Housing Options interview with the emphasis on preventing homelessness and saving, if appropriate, the current home. Where prevention of homelessness is not possible, the emphasis is on providing the most effective and appropriate homeless service.

Homelessness

There has been much discussion nationally regarding the contributory factors leading to an increase in homelessness nationally and locally. The main factors are considered to be:

- High demand for housing leading to high house prices and private rents with greater shortfalls between rents and Local Housing Allowance rates (LHA).
- Shortage of social housing for rent.
- Welfare benefits cuts and reforms.
- Cuts in statutory funding for statutory and voluntary services offering support to vulnerable people.

The total numbers of statutory homeless acceptances since 2014 for East Herts are shown below.

	2014	2015	2016	2017
Homeless applications	89	111	110	92
Homeless Acceptances	41	70	48	54
Percentage of acceptances against applications	46%	63%	44%	59%

Source: Housing Options Service

The Council accepted as homeless and owed a rehousing duty to 54 households in 2017. 70% of the accepted homeless applications in 2017 were from households containing dependent children or pregnant women and 50% were female lone parent families. There were almost twice as many single male

applicants (17%) as single female applicants (9%). 52% of accepted applicants were aged between 25 and 44 years of age, 20% between 16 and 24 and 19% between 45 and 49.

The most common priority need categories amongst the accepted homeless applicants in 2017 were households containing dependent children or pregnant women (61%), vulnerability as a result of mental health problems (11%) and vulnerability as a result of physical disability (17%).

The most frequent causes of homelessness for the accepted homeless applicants in 2017/18 were the loss of assured shorthold tenancy (48%), breakdown of relationship with parents, relatives or friends (21%) and domestic violence (11%).

Causes of homelessness	Number 2017	Percentage
Termination of assured shorthold tenancy	24	44%
Parents/friends no longer willing or able to accommodate	11	20%
Non-violent relationship breakdown	4	7%
Domestic violence	4	7%
Other reasons	11	20%

Source: Housing Options Service

One of the ways that central government measures homelessness levels is looking at homeless acceptances per 1,000 head of population. The figure for Hertfordshire for 2012/13 was 2.40 acceptances per thousand population. Data for East Herts shows:

Year	Per 1,000 head of population		
	East Herts	Hertfordshire	England
2016	0.67	2.57	2.54
2017	0.87	2.50	2.41

Source: MHCLG

East Herts has the lowest rate per 1,000 households out of the 10 local authorities in Hertfordshire but the rate for East Herts is increasing.

This homeless assessment is based on data captured under the current statutory framework, before the Homelessness Reduction Act 2017 commenced.

Temporary accommodation

The main source of temporary accommodation available to the Housing Service is the Council's Hostel accommodation which has 12 units of self-contained accommodation. It also has some accommodation that it can use for people with mental health issues that is managed by Genesis Housing. In emergency, when there are no other accommodation options available the Council places households into Bed and Breakfast accommodation. In 2017 43 households spent a total of 782 nights in Bed and Breakfast accommodation an average of 18 nights per household. The majority of these households were single people.

The total number of homeless households who were residing in temporary accommodation on 31st March 2018 was 25; this is higher than the figure on 31st March 2017 of 14 households. Ten of these applicants were residing within the Council's homeless hostel and eight were in Bed and Breakfast.

Affordability

East Herts is a very expensive housing market area. House prices are much higher than neighbouring areas and have significantly increased in recent years. The rental market reflects the same trends in terms of increasing cost across both private and affordable rented sectors.

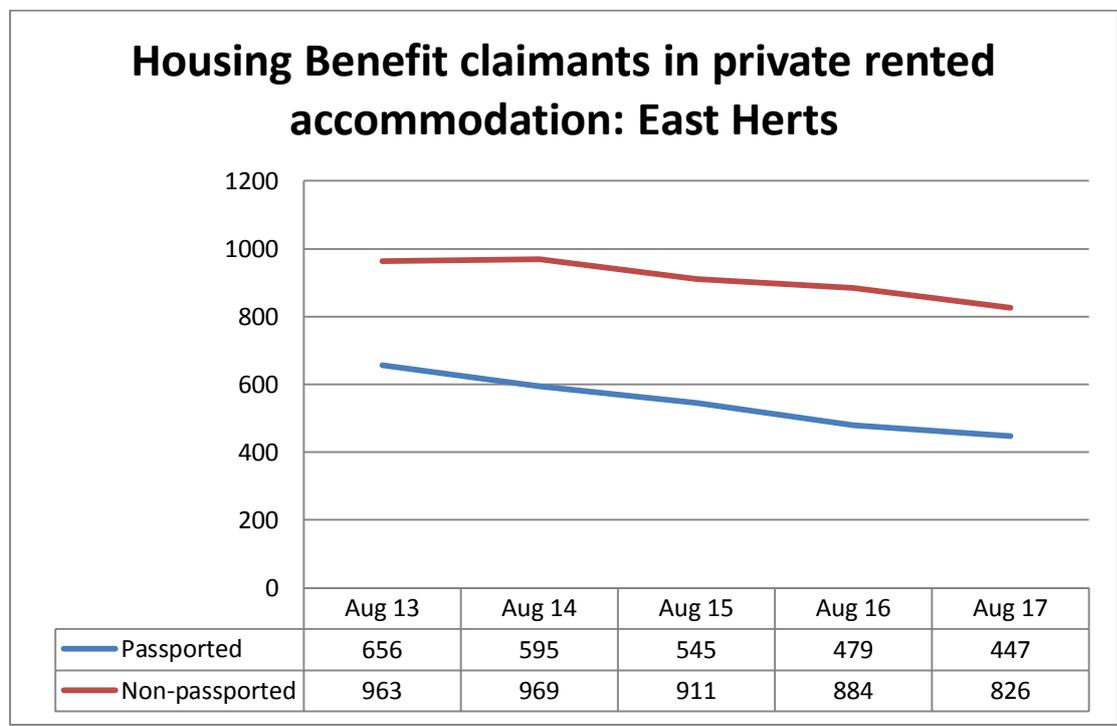
Just over half of the households registered on the Council's Housing Register are in employment (51%), of which 45% do not receive any welfare benefits.

It has become increasingly challenging for residents to secure homes that are affordable for them at open market value. The private rented market has rapidly expanded in East Herts with increased demand from households that are unable to afford to buy property in the district. There has also been a corresponding increase in households homeless as a result of loss of an assured shorthold tenancy (AST). In 2010 eight households were homeless as a result of the termination of their AST by their landlord. In 2017 the number had increased to 24 households.

This increased demand has led to rents increasing faster than pay. Shelter analysed official data from the Annual Survey of Hours and Earnings and the Index of Private Housing Rental Prices. They found that private rents in England have risen by 16% since 2011, outpacing average wages which have only risen by 10% over that period. In East Herts the lag between wages and rents is significantly greater. While rents have gone up by 29%, wages have risen by only 4% (based on two person household with one full time and one part time worker).

Analysis of the LHA freeze carried out by Shelter, puts East Herts 9th in the top 10 local authorities outside London with the biggest shortfall between LHA and rent for both families in two bedroom homes, who face a monthly shortfall of £218.66, and single people and couples in one bedroom homes with a monthly shortfall of £172.26.

Demand from households unable to buy, landlords' reluctance to let to HB tenants and the increasing gap between the Local Housing Allowance rate and rents have contributed to a significant drop in the proportion of private rented sector tenants that are in receipt of Housing Benefit. Between 2013 and 2017 there was a 22% (346 households) reduction in the number of households in receipt of Housing Benefit in private rented accommodation.



Source: Housing Benefit statistics

The Association of Residential Landlord published research they undertook in October 2018 which found that 61% of their landlords that let to tenants on Universal Credit have experienced their Universal Credit tenants going into rent arrears in the past 12 months. This is over double from 27% of landlords in 2016, and a significant increase from the previous year where it was 38% of landlords.

They also found that the amount owed by Universal Credit tenants in rent arrears has increased by 49% in comparison to the previous 12 months. This has increased from £1,600.88 in 2017 to £2,390.19. The Association concluded that rent arrears for Universal Credit tenants are likely to be driving homelessness, with 28% of landlords regaining possession of their property from a Universal Credit tenant and the primary reason being rent arrears (77% of landlords).

However affordability does not just impact on households within the private rented market. Although most social housing is let at rents at or below the Local Housing Allowance rate, the rent for a number of new build properties is considerably higher.

Most social landlords are performing affordability checks on potential tenants which indicates a recognition that affordability is a significant issue for them.

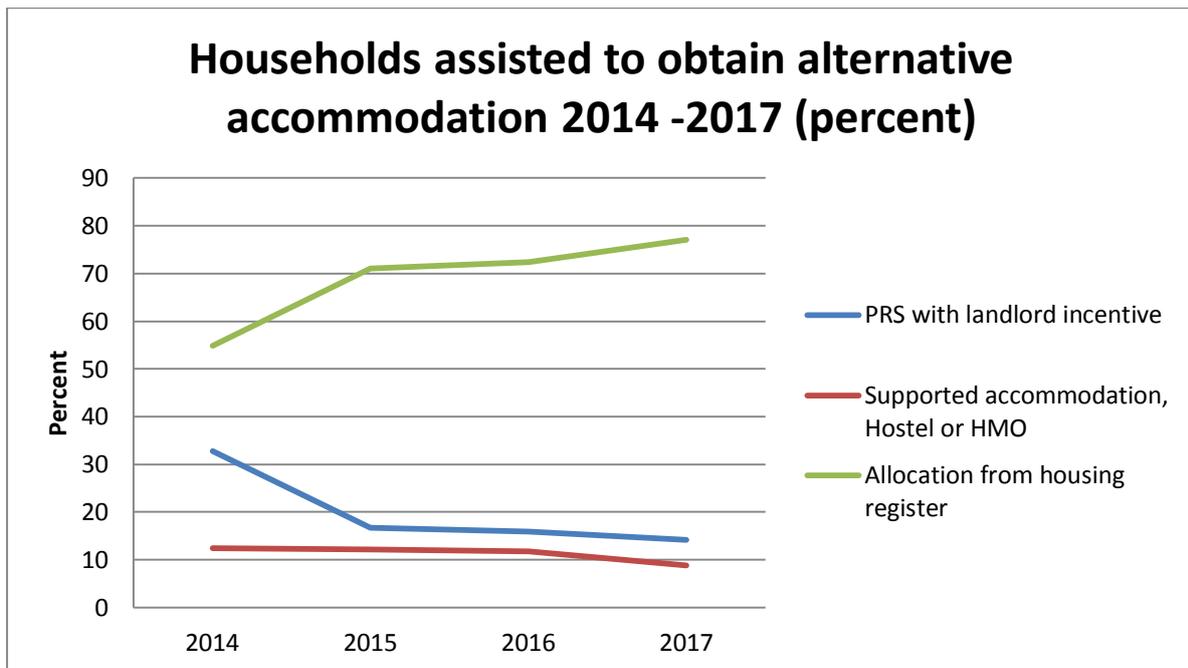
In 2001, 211 of the 348 local authority areas in England and Wales recorded Registered Provider rents at a higher percentage of 10th percentile gross salary than East Herts. By 2016 only 13 local authority areas were recorded with RP rents at a higher percentage of 10th percentile of gross earnings than East Herts.

Affordability is also becoming increasingly problematic for larger families, with “affordable housing” becoming “unaffordable” for people who need more than 3 bedrooms. This trend is starting to extend to smaller units.

Social Housing

The inaccessibility of the private rented sector increases the pressure on available alternative, more affordable housing solutions, such as housing association homes let on affordable rents. Demand for social housing in East Herts is high, and the number of applicants on the Council's Housing Register increased from 1,411 on 1st April 2014 to 2,048 on 1st April 2018 (an increase of 45%).

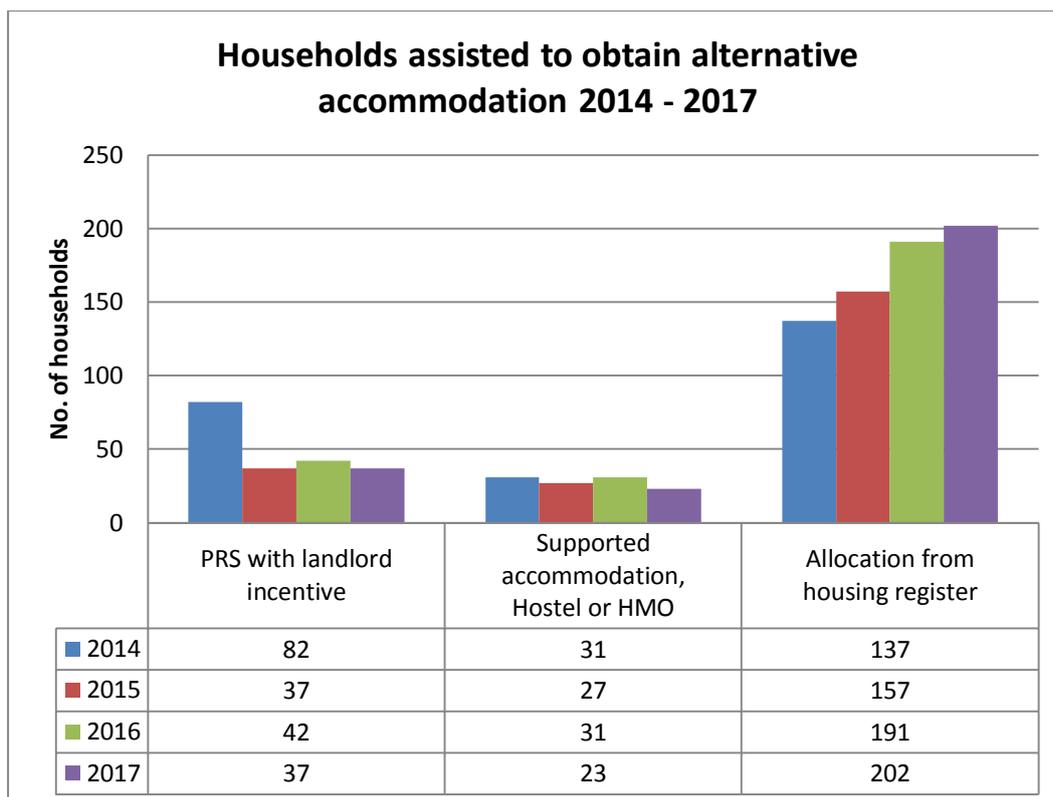
An allocation to social housing is playing an ever increasing role in the prevention of homelessness. While the number of households that have had their homelessness prevented has remained fairly constant, the proportion of households having their homelessness prevented through an allocation to social housing increased from 55% to 77% between 2014 and 2017.



Source: Housing Options Service

Homeless prevention

There has been a significant decrease in the number of households whose homelessness is prevented through securing a private rented sector tenancy. In 2017, only 14% of preventions were achieved through obtaining a PRS tenancy down from 33% in 2014. At the same time allocations from the housing register have seen a corresponding increase up from 55% to 77%.



Source: Housing Options Service

78% of the Council's successful homelessness prevention activity in 2017 was the result of securing alternative accommodation for people. The majority of these preventions related to nominations to housing association accommodation from the Council's housing register.

Rough Sleeping

East Herts continues to report low levels of rough sleeping. All local authorities have to submit an annual figure to central government indicating the numbers of people sleeping rough in their area on a single 'typical' night.

Rough sleepers are people bedded down in the open air – on the street, in tents, doorways, parks, bus shelters or encampments. It also covers people in buildings or other places not designed for habitation - such as stairwells, barns, sheds, car parks and cars.

Local authorities can decide whether to submit an estimate or carry out a count. Due to the district's rural nature and geographical size East Herts submit an estimate. In November 2018 our estimate for those rough sleeping in East Herts was nine. Of the nine 8 were male and they were all aged between 26 and 55 aside from one who was aged 21.

The Holy Trinity Church in Bishop's Stortford has provided a winter shelter for rough sleepers since 2015-2016 in which they have accommodated at least 10 (a number of which were from outside of East Herts) individuals in each of the last 3 years. The Housing Options Service works closely with the Shelter to identify alternative accommodation options for local residents each year. However, rough sleepers often present with complex needs and will require considerable support to secure and sustain settled accommodation and are often rough sleeping because they have recently lost housing association accommodation due to their behaviour.

Support Services

There are risks to wider services associated with reductions in public spending and the identifiable pressures that exist in other parts of the system. It is reasonable to anticipate these factors will ultimately result in a reduction in spending in services that contribute to the existing safety net, and increasing pressure on the Council's services and those of other partners locally to fill emerging gaps. This reduction in support services ultimately impacts on an individual's ability to sustain a tenancy and their homelessness or repeat homelessness.

5.0 Strategic objectives

East Herts' "Housing Options" approach has been successful at preventing and tackling homelessness. However trends in the housing market are making it increasingly difficult for lower income households particularly in the private rented market. We need to work in new ways, to intervene in people's situations to support them to prevent homelessness in East Herts.

Therefore identifying and securing new ways to access alternative housing options that are suitable and affordable will continue to be a high priority. The Council needs to explore new ways of helping residents, to dramatically increase the number of people for whom interventions result in sustainable outcomes, enabling more people to stay in their homes or to manage in the housing market without requiring ongoing or repeat intervention from public services.

The strategy recognises that it cannot rely on a private rented market that is excluding increasing numbers of people and which is the biggest contributor to homelessness. In addition if we were to rely on the private rented market then it would increase the likelihood that the Council will have to 'export' local people to more affordable housing markets in other areas, if it is to fulfil its legal duties under homelessness legislation now and in the future.

The review of homelessness has recognised that people present to Housing Services for advice and assistance for a variety of reasons. Those reasons are rarely directly attributable to "housing". Whilst the housing market itself is a challenge, they are often a result of people's financial capacity, employment, redundancy, ill health, alcohol and/or drugs misuse, relationship breakdown, or other underlying causes.

Frequently, these underlying causes are not being adequately addressed by the Council, or by the wider network of public services; often this is because the person does not meet relevant service thresholds where the right expertise may otherwise be available, or because we can sometimes – even when trying to operate collectively - work in isolation. Sometimes the person we need to help is considered ineligible by agencies, including ourselves, through eligibility (generally immigration status) or our qualification criteria. This can prevent services or assistance being provided early enough to prevent homelessness.

The Council has therefore developed four main objectives for this Strategy which are:

1. Strong and effective partnership working;
2. Early targeted intervention and advice to prevent the loss of accommodation;
3. Effective action to relieve homelessness and sustain tenancies to prevent repeat homelessness;
4. Protect and increase local housing options.

Objective 1 - Strong and effective partnership working

Partnership working has always been key to the successful prevention of homelessness in East Herts by working with partners to identify people who may be at risk of homelessness at the earliest opportunity. Strong relationships, referral routes and jointly delivered services will continue to lead to better outcomes for the homeless.

The Housing Service continues to play an active key role in many partnership arrangements in East Herts and more widely in Hertfordshire including:

- Community Safety Partnerships including MAPP (Multi-Agency Protection Panel) and MARAC (Multi Agency Risk Assessment Conference);
- Hertfordshire Children's Strategic Partnership Accommodation Board;
- Hertfordshire Supported Housing Strategic Board and the Local East Herts Accommodation Board;
- Hertfordshire Heads of Housing and Hertfordshire Homeless Managers Group;
- East Herts Mental Health Group.

These groups are useful for ensuring best practice and ensuring good networking opportunities are maximised to benefit the work that we and our partners all do to prevent homelessness and develop appropriate services for residents.

Challenges

Many services are seeing increases in demand and pressures, coupled with reductions in funding. This often leads to changes in eligibility criteria and increased thresholds for access to services, resulting in some groups of people “falling through the gaps” and being unable to access services.

There are a number of support agencies, some with supported accommodation within East Herts. It can be difficult for vulnerable people (and the agencies who support them) to navigate between these. Strong joint working between partner agencies can significantly improve the outcomes for vulnerable homeless people. Developing referral processes and relationships with organisations will offer a more consistent and meaningful offer of assistance to individuals.

The public body Duty to Refer obligations that have been introduced under the Homelessness Reduction Act mean that a larger number of agencies, some of whom may have limited knowledge of the issues affecting homeless persons or the nature of available services, will be required to assist homeless households to access advice and assistance.

ACTIONS

- Work with partners to develop and deliver effective advice, prevention and homelessness services within East Herts.
- Work with partner agencies to ensure efficient referral mechanisms are in place for example food banks to assist customers who may benefit from, advice and/or support to assist them to improve their situation where possible.
- Re-launch the Homelessness Strategy Group with partner organisations in East Herts to share information, monitor the causes and consider best practice in preventing and providing solutions to homelessness.

- Improve housing and homelessness knowledge throughout partner agencies which will enable customers to receive the correct advice/information on housing related issues.
- Work with Hertfordshire County Council to update the current protocols for homeless 16 & 17 year olds, careleavers and intentionally homeless families.

Objective 2 - Early targeted advice and intervention to enable residents prevent the loss of accommodation.

Early identification of problems and the provision of high quality advice and assistance will ensure people have the best chance of staying in their home. Some groups are more likely than others to experience homelessness within East Herts so require advice and assistance that is tailored to meet their needs.

Challenges

Lack of awareness of housing advice and prevention services within East Herts can mean that households do not access assistance until after they have lost their home.

Vulnerable groups may have additional needs and require more specialist advice and prevention services, or more support and encouragement to access or engage with services.

Households may have difficulty adjusting to changes to the benefit system, such as direct payments under Universal Credit, and may suffer financial hardship and homelessness as a result.

Loss of rental income has a major impact on both Social and Private Sector Landlords, who will often need to commence possession action in the event of persistent rent arrears.

ACTIONS

- Review and update all internal processes and procedures to ensure they that they are Homelessness Reduction Act compliant.

- Review the homelessness prevention advice available on the Council's web site and ensure that relevant and clear information is available for vulnerable groups.
- To mitigate the impacts of Welfare Reform and Universal Credit work with internal and external partners to ensure sufficient welfare, debt and budgeting advice is available at the earliest opportunity.
- Devise an early intervention protocol with all Registered Providers to address factors such as rent arrears and anti-social behaviour to prevent evictions where possible.
- Identify with key partners relevant data to recognise early risk factors for groups at risk of homelessness and signal opportunities for early intervention.
- Work with Private Sector Landlords and Lettings Agents to develop early signposting protocols for tenants with arrears or other tenancy concerns, to the Housing Options Service, to prevent homelessness.

Objective 3 - Effective action to relieve homelessness and sustain tenancies to prevent repeat homelessness

Strong and effective pathways ensure that suitable accommodation can be secured as soon as possible. Suitable local temporary accommodation can minimise the negative effects of homelessness, before longer term accommodation can be found.

Many homeless applicants need support to sustain independent accommodation in the long-term. Access to supported housing, transitional, longer-term and crisis support services can reduce the risk of repeat homelessness.

Challenges

There are limited temporary accommodation options within East Herts for households who require accommodation in an emergency. As a result households often need to be accommodated within Bed and Breakfasts that are

located outside of the East Herts area, away from their existing networks. There is a need for more suitable temporary accommodation options within East Herts.

There are limited tenancy sustainment services available within East Herts. Many agencies have withdrawn these services because of funding concerns. Vulnerable people can experience difficulties at multiple times during an independent tenancy, which can lead to financial difficulties and tenancy failure. Included within this are a small number of households within East Herts who repeatedly experience tenancy failure and homelessness.

Some tenancies fail because vulnerable people have moved into independent accommodation before they have acquired the necessary skills for independent living.

ACTIONS

- Ensure all eligible households who are at risk of homelessness within 56 days are referred to the Council's Housing Options Team to make a homeless application.
- Continue to review the supply of suitable temporary accommodation within East Herts to ensure sufficient supply.
- Respond to reports of rough sleeping within 24 hours and ensure this response adequately engages with rough sleepers.
- Work to develop a stronger multi-agency rehousing pathway to incidents of rough sleeping.
- Review the availability in the District of support to vulnerable households, who have difficulty sustaining accommodation, including the availability supported accommodation and move-on to independent accommodation.
- Review the level of repeat homelessness and work with partner agencies to prevent incidents of repeat homelessness within East Herts.

Objective 4 - Protect and increase local housing options

Demand for the limited amounts of social and supported housing within East Herts is high and most low income households have difficulty accessing the private rental sector as they lack funds or references to secure accommodation in the Private Rental Sector.

The Council aims to work with partners to make the best use of existing resources, improve access to available options, increase supply and identify and address gaps in provision.

Challenges

The majority of Private Sector Landlords and lettings agents are reluctant to accept tenants who are on low incomes or who claim welfare benefits particularly those moving to Universal Credit.

With increased private rent levels and the high cost of buying a home, it will be more difficult to meet the housing needs of households who are unable to access home ownership or accommodation in the private rented sector.

There is demand for more supported accommodation within East Herts, particularly for those who have complex support needs.

ACTIONS

- Work with partners to review current, and identify new, sources of supported accommodation to meet the needs of groups who are particularly at risk of homelessness in East Herts.
- Increase the supply of affordable social housing within East Herts, particularly accommodation that is let at or below Local Housing Allowance rates.
- Continue to manage opportunities to make the best use of existing Registered Provider housing stock within East Herts.
- Promote and improve the Council's private rented accommodation offer, working with landlords and letting agents.

6.0 Resourcing the Strategy

In common with other local authorities, the Council has been affected by austerity and year on year reductions in central government grant funding. These have required it to transform and constantly review opportunities to become more efficient.

In a 2-tier area, the Council is also vulnerable to funding decisions that are made by Hertfordshire County Council that can have knock-on consequences for district level resources.

Despite these pressures, the Council has continued to prioritise its frontline services and has continued to invest in its Housing Services. Homeless Services remain a priority for the Council and it is committed to ongoing work to improve the way we engage and support people who are homeless or at risk of becoming homeless.

The Council has targeted the use of the Ministry for Housing, Communities and Government "Preventing Homelessness Grant" funding and "Flexible Homelessness Support Grant" on the front line Housing Service by the recruitment of additional members of staff as well procuring specialist services from partners agencies such as the Citizens Advice service for debt advice and Herts Young Homeless for homeless prevention work in schools as well as directly supporting individual homeless applicants to sustain or secure accommodation.

The Council will continue to seek to capitalise on any additional opportunities to draw down funding into the area to support homelessness and related services, including by supporting our voluntary sector partners to seek funding from sources that may be exclusively available to them.

7.0 Monitoring the Strategy

The Homelessness Strategy Objectives and Delivery Plan will be monitored by the multi-agency Homelessness Strategy Group and the Council's Performance, Audit and Governance Scrutiny Committee.

The Delivery Plan will be reviewed and updated every 6 months to ensure it reflects changes or developments in National or Local Policy or service provision.

The previous national homelessness reporting requirements (known as P1E data) were focused on accepted homeless cases and therefore did not give an accurate picture of homelessness within East Herts. From April 2018, all Housing Authorities have been required to collect and submit detailed case-level performance information relating to all homeless applications (known as H-Clic data). The Council will regularly review this performance information to develop a clearer understanding of the local causes of homelessness and to assess the effectiveness of local services and identify any gaps in provision.

Five performance indicators will be used to assess the effectiveness of the Homelessness Strategy:

1. Number of homeless applications where homelessness is successfully prevented;
2. Number of homeless applications where homelessness is successfully relieved;
3. Number of homeless applicants to whom the Council accepts the full homeless duty;
4. Number of homeless applicants who are placed into temporary accommodation;
5. Number of repeat homeless applications (made within 2 years of original application closure date).

8.0 The Delivery Plan

This Preventing Homelessness Strategy is deliberately focused on action and delivery through the delivery plan which is attached as Appendix B.

The actions within the Delivery Plan have been consulted on and agreed with our partners. However because the Strategy is a five year document the actions will be regularly reviewed, updated and revised by the Homeless Strategy Group to reflect the current homeless situation and priorities.

This will be developed based on the agreed Actions following completion and adoption of the Strategy.

Affordable Rent means rented housing let by a Registered Provider of social housing to households who are eligible for Social Rented housing at a rent of no more than 80% of the Local Market Rent, including service charges where applicable, and upon the approved Financial Terms at a fixed term tenancy for a period not less than that recommended by the social housing regulator

Benefit Cap is a maximum allowance on the total amount of benefit a household is entitled to receive. The Benefit Cap will only apply if a household is in receipt of Housing Benefit or Universal Credit. The applicant's benefits will be reduced if they receive more than the limit that applies for their circumstances - this means they will get less Housing Benefit or Universal Credit.

For couples or households with children the benefit cap is £384.62 per week. The limit for single people with no children is £257.69 per week.

Social Rent means housing let at a periodical rent due at intervals of a month or less without any fine deposit or premium which is let at or below Target Rent and is let on the Registered Provider's standard form of letting as an Assured Tenancy and upon the approved Financial Terms

Fixed term tenancies are a new type of tenancy introduced under the Localism Act 2012 available for registered providers to use from the date of inception of the Act that has a specified term of not less than 5 years or 2 years in exceptional circumstances. Fixed term tenancies can be used for Affordable Rent or Social Rent properties.

Local Housing Allowance (LHA) is the maximum amount of Housing Benefit payable by number of bedrooms in a property in a Local Authority Area. It is updated annually and is calculated using the 30th percentile of market rent for each property size in that local authority area.

Mutual Exchange is a facility that enables a tenant to exchange their property and tenancy with another of their own Registered Provider's tenants or with a tenant of a different Registered Provider.

Registered provider is the term used for housing associations or other private sector developers, local Council's etc. who have registered to provide social housing with Homes England.

Universal Credit is a new approach to welfare to be introduced under the Government's welfare reforms in 2013 phased across the country. It will be an integrated benefit in place of income support, income-based job seekers allowance, income related employment and support allowance, housing benefit, child tax credit and working tax credit. Households in receipt of universal credit and not in receipt of specific exempt benefits will be subject to the benefit cap defined above.

Equality Impact Analysis Form

1. Equality Impact Analysis (EIA) Form

Title of EIA (policy/change it relates to)	Homelessness and Rough Sleeping Review and Strategy 2019-2024	Date	11/1/2019
Team/Department	Housing Service, Housing and Health		
Focus of EIA What are the aims of the new initiative? Who implements it? Define the user group impacted? How will they be impacted?	<p>The overall purpose of the Homeless Strategy (Strategy) is to ensure that as a Council we address homelessness strategically by ensuring suitable accommodation, support and advice is available and accessible to all client groups and to encourage a multi-agency approach to preventing homelessness.</p> <p>Aim</p> <ul style="list-style-type: none"> • To meet the Council's statutory duty to produce a homelessness review and strategy once every five years. • To present a full picture of the reasons for homelessness and the groups of people most likely to become homeless. • To define strategic priorities local to East Herts for homelessness and the prevention of homelessness and actions for the council and its partners. To prioritise resources for the groups most in need of assistance. • To produce better outcomes for homeless households, enabling them to live in accommodation suitable for their needs with appropriate support if required. 		

	<p>Implementation</p> <p>The Strategy is implemented and monitored by the council's Housing Service with assistance from the council's internal and external partners.</p> <p>The council has a duty to provide housing advice and assistance to all those that are eligible, i.e. the applicant meets immigration criteria as defined by the Government.</p> <p>For Service users that approach the council an assessment will be carried out regarding their current housing situation and advice and assistance offered according to current legislation and best practice to prevent or relieve homelessness.</p>
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Please note: Prepopulated data for protected categories other than Age and Gender come from 2011 census results¹ on the district, the Age and Gender data comes from ONS mid-year estimates². If the service has specific demographic data for service users/residents than this should be used instead.

¹<https://www.nomisweb.co.uk/census/2011>

²<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

2. Review of information, equality analysis and potential actions

Please fill in when appropriate to the change. If it does not, please put N/A

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff		What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts (actual and potential, positive and negative. Clearly state each)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Age	16-24 25-44 45-59 60-64 65-74 Over 75	21% 58% 17% 2% 1% 1%	Despite an ageing population, younger age groups remain the most susceptible to homelessness. The age ranges 16-24 and 25-44 have comprised over 75 of all cases in the last four consecutive years.	The homelessness legislation defines which groups have a priority for housing and the most significant group is those with children. Which comprises the age range 16 – 59.	The legislation framework promotes discrimination
Disability	12 % of the households accepted under the homelessness legislation had a recorded disability. This is higher than the 2011 Census		Applicants with a registered disability are likely	Legislation and policy are designed to give certain groups who are	The legislation framework promotes discrimination

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts (actual and potential, positive and negative. Clearly state each)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	figures for East herts which recorded 5.8% of the population who stated that their day to day activities were impacted a lot by their long term health or disability.	to be given a higher priority for rehousing or be accepted as vulnerable as defined under the homelessness legislation.	less able to access suitable accommodation a higher priority for housing and applicants with a disability are one of these groups.	
Gender reassignment	This is not currently monitored for homeless applications and there are no plans to do so.			No action required
Pregnancy and maternity	This information is not recorded as part of the homeless application process.	Applicants who are pregnant or have a child are likely to be given a higher priority for rehousing or be accepted as vulnerable as defined under the		The Homeless legislation confers an additional priority for rehousing an applicant that is pregnant or has a child above someone that is not pregnant or does not have a child.

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff		What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts (actual and potential, positive and negative. Clearly state each)	What can you do? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			homelessness legislation.		
Race	<p>White</p> <p>English/Welsh/Scottish/Northern Irish/British</p> <p>Irish</p> <p>Gypsy or Irish Traveller</p> <p>Other White</p> <p>Mixed/multiple ethnic groups</p> <p>White and Black Caribbean</p> <p>White and Black African</p> <p>White and Asian</p> <p>Other Mixed</p> <p>Asian/Asian British</p> <p>Indian</p>	<p>95.47%</p> <p>90.25%</p> <p>1.14%</p> <p>0.04%</p> <p>4.04%</p> <p>1.61%</p> <p>0.45%</p> <p>0.15%</p> <p>0.62%</p> <p>0.38%</p> <p>1.95%</p> <p>0.73%</p>	<p>The data requested each quarter by the government for 17/18 shows for a total of 72 households assessed under homelessness:</p> <p>White 85%</p> <p>Black 7%</p> <p>Asian 3%</p> <p>Mixed 4%</p> <p>Other 1%</p>	<p>The numbers are very small and the effect of one household can have a marked impact of the recorded statistics.</p>	<p>No action required</p>

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts (actual and potential, positive and negative. Clearly state each)	What can you do? All potential actions to: • advance equality of opportunity, • eliminate discrimination, and • foster good relations																						
	<table border="0"> <tr> <td>Pakistani</td> <td>0.15%</td> </tr> <tr> <td>Bangladeshi</td> <td>0.20%</td> </tr> <tr> <td>Chinese</td> <td>0.37%</td> </tr> <tr> <td>Other Asian</td> <td>0.49%</td> </tr> <tr> <td>Black/African/Caribbean/Black British</td> <td>0.71%</td> </tr> <tr> <td>African</td> <td>0.43%</td> </tr> <tr> <td>Caribbean</td> <td>0.22%</td> </tr> <tr> <td>Other Black</td> <td>0.07%</td> </tr> <tr> <td>Other ethnic group</td> <td>0.26%</td> </tr> <tr> <td>Arab</td> <td>0.10%</td> </tr> <tr> <td>Any other ethnic group</td> <td>0.16%</td> </tr> </table>	Pakistani	0.15%	Bangladeshi	0.20%	Chinese	0.37%	Other Asian	0.49%	Black/African/Caribbean/Black British	0.71%	African	0.43%	Caribbean	0.22%	Other Black	0.07%	Other ethnic group	0.26%	Arab	0.10%	Any other ethnic group	0.16%			
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Religion or belief	<table border="0"> <tr> <td>Christian</td> <td>62.75%</td> </tr> <tr> <td>Buddhist</td> <td>0.32%</td> </tr> <tr> <td>Hindu</td> <td>0.45%</td> </tr> </table>	Christian	62.75%	Buddhist	0.32%	Hindu	0.45%	Not monitored under homelessness		No action required																
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Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff		What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts (actual and potential, positive and negative. Clearly state each)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
	Jewish Muslim Sikh Other religion No religion Religion not stated	0.33% 0.72% 0.12% 0.32% 27.75% 7.26%			
Sex/Gender	The district is 51% female and 49% male		There are more women than men recorded as having an accepted homeless application.	Households defined as having a priority need include those with dependent children or a pregnant woman. In addition, a significant number of households with dependent children are headed by single women.	No action required

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff	What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts (actual and potential, positive and negative. Clearly state each)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
			The discrepancies between the census data and housing register figures can therefore be explained by the legislation governing how homeless applications are assessed.	
Sexual orientation	Not monitored		Applications would be assessed based on existing legislation and couples can make joint applications. Sexual orientation would not be part of the assessment.	No action required

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff		What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts (actual and potential, positive and negative. Clearly state each)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
Marriage and civil partnership	Single Married Civil partnership Separated Divorced Widowed	30.5% 52.3% 0.2% 2.3% 8.6% 6.2%	Not monitored under homelessness. However 50% of the applications were female lone parent families.	Households defined as having a priority need include those with dependent children or a pregnant woman. In addition, a significant number of households with dependent children are headed by single women. The discrepancies between the census data and housing register figures can therefore be explained by the legislation governing how homeless applications	No action required

Protected characteristics groups from the Equality Act 2010	What do you know? Summary of data about your service-users and/or staff		What do people tell you? Summary of service-user and/or staff feedback	What does this mean? Impacts (actual and potential, positive and negative. Clearly state each)	What can you do? All potential actions to: <ul style="list-style-type: none"> • advance equality of opportunity, • eliminate discrimination, and • foster good relations
				are assessed.	
Assessment of overall impacts and any further recommendations					
<p>The Governments homeless legislation defines who should be owed a housing duty or assisted under homelessness. The legislation and associated case law is specifically designed to ensure those less able to access their own housing solutions are assisted – i.e. those that are considered vulnerable are more likely to ask for assistance and be assisted under Homelessness legislation. The government has carried out its own Equalities Impact assessment during the legislative process.</p>					

3. List detailed data and/or community feedback which informed your EqIA (If applicable)

Title (of data, research or engagement)	Date	Gaps in data	Actions to fill these gaps: who else do you need to engage with? (add these to the Action Plan below, with a timeframe)
None - figures taken from Council's own monitoring systems			

4. Prioritised Action Plan (If applicable)

Impact identified and group(s) affected	Action planned	Expected outcome	Measure of success	Timeframe
NB: These actions must now be transferred to service or business plans and monitored to ensure they achieve the outcomes identified.				

EqIA sign-off: (for the EQIA to be final an email must sent from the relevant people agreeing it or this section must be signed)

Lead Equality Impact Assessment officer:		Date:	
Directorate Management Team rep or Head of Service:	Ben Woods	Date:	
Author of Equality Impact Analysis:	Claire Bennett	Date:	18/1/2019