

Homelessness Accommodation Policy

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This policy accompanies the Homelessness and Rough Sleeping Strategy and should be interpreted in the context of that strategy and the associated action plan. For some groups of homeless households there are also separate joint protocols, such as for 16/17 year olds and these are all available on request. The **Homeless Young People's Protocol** can be found on the Camden website.

The Council currently provides accommodation to meet a range of housing needs:

- Temporary accommodation for homeless households or those waiting for a homelessness decision.
- Accommodation to prevent or relieve homelessness.
- Accommodation in the private rented sector to end the Council's main homelessness duty under the Localism Act 2011.
- Social housing is allocated via the housing allocations scheme, with reasonable preference given as required by law to homeless households.

The Council also commissions housing-related support services for single homeless people with support needs that are delivered in hostels and supported housing.

This policy relates to accommodation provided by Camden Council, under the duties set out in the Homelessness Reduction Act 2017.

Allocation of social housing tenancies

Councils must allocate social housing in accordance with their allocations schemes. Camden's housing allocations scheme sets out its priorities for allocating social housing. The scheme grants reasonable preference to homeless households and additional priority to families engaging with the Council to prevent or relieve their homelessness in the form of an additional 100 points to households where homelessness has been prevented or relieved for a period of six months.

But the demand for social housing tenancies from residents with a wide range of housing needs far outstrips supply in Camden, so that we need other accommodation solutions for homeless families.

The Floating Support Service works with families at risk of homelessness and in temporary accommodation and assisted bidding is offered where appropriate to ensure that all are able to access the council's housing allocation scheme.

Priorities for private sector accommodation

The Council's homelessness prevention approach is aimed at reducing the need to place households in temporary accommodation and instead moving them on to settled and sustainable accommodation to meet their housing need. The approach means that families should spend little or no time in temporary accommodation and should not face repeated moves and the disruptions. It also minimises the amount of temporary accommodation the Council has to provide, which is costly, and instead secures long term, sustainable private rented accommodation.

Private rented accommodation is made available to eligible households who are homeless or at risk of homelessness, likely to be in priority need and with a local connection to Camden. A supportive

assessment process ensures applicants are able to sustain a tenancy and a “good tenant’s training session” is provided. Where people have become homeless intentionally, we will take into account the reasons for their homelessness when considering if we can assist with another offer of private rented accommodation.

The Council has various statutory duties to provide support to those at risk of homelessness within a set time period. For applicants owed the statutory homelessness prevention or relief duty and who are assessed as being able to sustain a tenancy, a maximum of three reasonable offers of affordable private rented housing will be made. Individual circumstances are considered in making these offers, including time scale, affordability, household preferences and needs. If a household is actively engaging with the Council but a choice of suitable offers has not been available but is expected to be, we will consider extending the statutory relief casework period. An acceptance of any suitable offer will end the Council’s statutory duty. Ultimately a final suitable offer will be made and the household will be notified in writing and the Council’s statutory duty will be formally ended, whether the offer is accepted or refused. Where we have not been able to prevent or relieve homelessness, and a household is owed the main homeless duty, we will usually bring our duty to an end with one suitable offer of private sector accommodation. We will generally look to offer private rented sector supply as near to Camden as possible (taking account of individual circumstances and the availability of property), with the priority being to ensure a sustainable letting is achieved.

Private rented sector accommodation standards

All accommodation must comply with basic minimum standards:

- Physical standards – documentary checks will be completed to ensure that electrical and gas equipment is safe and a fire risk assessment will be carried out. Properties will have an Energy Performance Certificate and a valid Gas Safety Certificate. Properties let through the private rented scheme will be required to meet our Camden Lettings property standards, as defined in our Camden Lettings Property Standards document. An assessment will be carried out under the housing, health and safety rating system (HHSRS) to check for any relevant hazards.
- Good management and the role of the landlord - landlords will be expected to demonstrate that they are a fit and proper landlord (for example through commitment to membership of a landlord accreditation scheme) and provide a written tenancy agreement.

When deciding if a property is suitable for a particular household, we will complete a suitability assessment, adhering to the Homelessness Reduction Act 2017 (s.206 and s.210), Chapter.17 of the code of guidance, and the following factors will be taken into consideration.

- Affordability - where a household is claiming housing benefit or Universal Credit, we look for properties that meet a household’s bed need that are in areas where the LHA rent is affordable. In the current climate of rising rents and caps on benefits, such properties are likely to be out of borough, and increasingly out of London, particularly for larger properties. We will consider a household’s income and their ability to meet any shortfall between the housing benefit paid and the rent. In some cases, such as when they are housed temporarily, households may be eligible for a discretionary housing payment (DHP). However, DHP will only be considered as a short-term ‘stop-gap’ and not as a long-term solution for housing affordability. Ensuring that accommodation is affordable and sustainable is central to the success of our strategy.
- Location - where accommodation is procured outside of Camden, we will consider the travelling distance of the property from Camden or where the family was previously living, if not in Camden and how the location of the property affects family members. This includes, as far as possible, the impact of location on the factors listed below. Where we make placements outside of the Borough, we will notify the host local authority.

- Services, amenities and transport - we will consider the proximity and accessibility of the accommodation to local services, amenities and transport.
- Employment - the type and hours of employment will be taken into consideration alongside the cost and ease of any potential commute. The possibility of taking up new employment will also be considered.
- Children - in accordance with section 11 of the Children Act 2004, we will consider the needs of any children in the household and how to safeguard and promote those needs. We will always try to provide housing options within Camden, but if households with children known to Children's Safeguarding and Social Work as Children in Need accept housing out of borough, then they will be transferred to the appropriate new-borough support service. The new local authority's children service will be notified by Camden and a period of joint working will ensure the needs and welfare of the children are safeguarded.
- Education - the age and stage of education of children will be taken into account, including any public examinations the children will be taking. The cost (particularly for over 16 year olds where travel costs will be incurred), ease and distance of any potential commute to existing schools will be considered, along with the possibility of relocating to schools closer to the property offered. Children of primary school age may need to move to schools closer to their new home. Where a child or young person has special educational needs and/or a disability, an Education Health and Care Plan and in a specialist placement we will take into account the impact of a move on their access to specialist provision.
- Childcare and other caring responsibilities - existing childcare arrangements are considered as well as any other caring responsibilities, including the nature of the care provided, and the feasibility of maintaining these or making other arrangements.
- Medical and health issues - any medical or health needs will be taken into account, including any current ongoing treatment and support and the possibility of transferring to new healthcare providers closer to the property. Where a household needs accessible accommodation, this will be taken into account.
- Family and community support - as far as possible, family support and community links will be taken into consideration. Where there is social worker involvement with a family, they will be involved in any discussions about moving the family to alternative accommodation to ensure their needs can be met.

Bedroom standard in the private rented sector

The following household members are expected to share a bedroom:

- Adult couples.
- Two children aged under 16 years of the same sex.
- Two children aged under 10 years regardless of sex.

The following household members should have their own room:

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

We will offer couples and lone parents with a single child of up to 5 years old at the start of the placement a one-bedroom property or where applicable a suitably sized room in a family hostel where the overall size of the accommodation is sufficient for the needs of one or two adults and one child.

How private rented sector accommodation will be allocated

We anticipate needing to place around 150-250 households into private rented scheme (PRS) accommodation per year. These numbers can change significantly as demand is difficult to predict. When a property is made available, suitable applicants will be identified. Allocating accommodation procured in the private sector is often time-critical, as landlords want to minimise lost rents due to void periods and we need to limit the risk of the property being let elsewhere. Due to the short time frames involved in the allocation of private sector properties, potential applicants will be contacted directly by the Council to arrange a viewing. Where an applicant cannot be contacted another potential applicant will be contacted.

The final decision to accept or reject a household will usually rest with the landlord. If the landlord refuses a nominated household, the offer will be withdrawn and a further offer will be made when a suitable property becomes available. If the refusal is due to behaviour of the applicant, this may result in them being withdrawn from further offers whilst we work with them to address any issues raised.

Once both the applicant and landlord accept, an assured short-hold tenancy with a minimum fixed term of 12 months will be signed.

How temporary accommodation is allocated

We can anticipate needing to place around 300 households into temporary accommodation (TA) per year. We can also anticipate needing to transfer around 120 placed households from one TA placement to another, for reasons such as household composition changes, changing medical needs, risk of violence and other reasons.

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

Due to affordability, the Council's main source of in-borough temporary accommodation is our hostel stock. Where a Camden hostel is not suitable due to the household size, medical, disability or other circumstances, or a hostel would be suitable but is not available, and no alternative supply is available in borough, then we will normally procure nightly rated "annexe" accommodation which is a self-contained flat or house in the private rented sector. Assessments of suitability of offers of temporary accommodation take into account the current legislation on suitability of accommodation, case law, and the Pan London Inter Accommodation Agreement (IBBA) which places responsibility on the placing authority to accommodate vulnerable households in their own area.

Once temporary accommodation has been identified, the household will be given an offer letter and advice about their responsibilities and the Council's role whilst living in the temporary accommodation. In placing households in temporary accommodation the Council will take account, as is reasonably practicable, the placement grid (below) in deciding which households to select for accommodation in, or at various distances from Camden.

Priority for housing locally

All properties will be included in a zone as follows:

- Zone A1 – located in the London Borough of Camden.
- Zone A2 – located in a nearby London borough (e.g. Brent, Barnet, Enfield, Haringey, Hackney, Islington, Newham, Southwark, Westminster, Waltham Forest).
- Zone B – located in another London borough.
- Zone C – located near to London (within 50 miles, including the Home Counties).
- Zone D- located beyond Zone C.

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

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

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

Placement Summary Grid:

Property Zone	Household Description
A1	<ul style="list-style-type: none"> • Households with at least one child who is subject to a child protection plan. • Households where Camden's Social Services have serious concerns about one or more children and are working intensively with the household. • Households with one child (or more) who has an Education Health and Care Plan, and where the move would be seriously detrimental to the child's wellbeing. • Households with an applicant who has severe and enduring mental health problems who is receiving psychiatric treatment and aftercare provided by local community health services and has an established support network where a transfer of care would severely impact on their ability to engage with treatment and care plans. • Households where at least one member is in receipt of a significant care package provided or sponsored by Camden's Social Services which cannot be transferred. • Households including a person who is terminally ill and receiving care or significant support in Camden. • Households where there is a risk to be managed such as those with a history of anti-social behaviour, prolific and persistent offenders and those housed through MAPPA and other projects.
A2	<ul style="list-style-type: none"> • Households with one child (or more) in secondary school in their final year of Key Stage 4 (generally Year 11). • Households where at least one member is suffering from a life threatening illness, or is severely disabled and is receiving regular (at least fortnightly) treatment at a hospital in Camden. • Care leavers moving on in accordance with the Council's pathway plan. • Households where one person (or more) is in permanent and settled employment in or near to Camden and this employment will be lost should the member be unable to commute to their place of work. • Households receiving care, which would be disrupted or cease if the registered care provider is unable to commute to fulfil their caring duties. • Households where a member of the household is caring for another person in the borough who falls into one of the following categories and they would be unable to commute to meet their caring duties: <ul style="list-style-type: none"> • Over 75 years old and living alone, or with no other member of the household under 75 years of age, or in receipt of the medium or higher rate of the care component or the higher rate of the mobility component of the Disability Living Allowance, Attendance Allowance or War Disablement pension.
B	<ul style="list-style-type: none"> • Household with one or more child in secondary school or further education college in Camden or neighbouring borough (other than those in the final year of Key stage 4 - see Group A above). This group will be prioritised for housing within reasonable commuting distance of the school or college. • Households where one person (or more) is in permanent and settled employment and this employment will be lost should the member be unable to commute to their place of work. This group will be prioritised for housing within reasonable commuting distance of their workplace. • Households where one person (or more) is receiving medical treatment that can only be provided by a specific medical facility: this group will be prioritised for housing within reasonable commuting distance to the medical facility.

C	<ul style="list-style-type: none"> Households not falling within A and B above where one person (or more) has a need to be within reasonable commuting distance to London.
D	<ul style="list-style-type: none"> All other homeless households will be offered private rented sector accommodation wherever the borough is able to procure it.

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

Whilst the Council will continue to attempt to secure accommodation as near to Camden as possible, affordability considerations are making this more and more difficult. It is forecast that placements into private rented tenancies may be made in each zone in the following proportions, though this data must be treated with caution as this will depend on the outcome of many factors that will affect supply and demand:

Zone	Forecast as in 2016 Homelessness Accommodation Strategy	Outturn for 2017/18 (from 170 placements):	Forecast for 2019-24
Zone A1 – in Camden	5%	39%	20%
Zone A2 – in a nearby London borough (Brent, Barnet, Enfield, Haringey, Hackney, Islington, Newham, Southwark, Westminster, Waltham Forest)	40%	52%	40%
Zone B – another London borough	40%	8%	25%
Zone C – near to London (within 50 miles)	10-15%	1%	5-10%
Zone D – beyond Zone C	0-5%	0%	0-5%

Communication

Households approaching the Council due to homelessness or the threat of homelessness are informed, in writing, of the options available to them. The Council encourages families threatened with homelessness to work with the Council early to prevent their homelessness. A Personal Housing Plan is provided when a casework service is required.

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

Review

Applicants have a right to request a review of the suitability of accommodation offered to them under the homeless legislation. The review will be carried out by an officer who has not been involved in the original decision who is senior in grade to the decision-making officer.

Keeping this policy under review

This policy will be reviewed on an annual basis.