

Wellbeing Panel

Agenda

Date

Wednesday 5 August 2020

Time

6pm

Place

To be hosted remotely at
Thorpe Lodge
1 Yarmouth Road
Thorpe St Andrew
Norwich

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Members of the Wellbeing Panel

Cllr F Whymark
(Chairman)

Cllr M L Murrell
(Vice Chairman)

Cllr A D Crotch
Cllr R R Foulger
Cllr N J Harpley
Cllr S Lawn

Cllr S M Prutton
Cllr N C Shaw
Cllr L A Starling
Cllr D M Thomas

Conservative Substitutes

Cllr A D Adams
Cllr S C Gurney
Cllr D King
Cllr G F Peck
Cllr C E Ryman-Tubb
Cllr S C Walker
Cllr J M Ward

Liberal Democrat Substitutes

Cllr J A Neesam
Vacancy

Labour Substitute

Cllr B Cook

If any Member wishes to clarify details relating to any matter on the agenda they are requested to contact the relevant Director / Assistant Director

Public Attendance

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<https://www.youtube.com/channel/UCZciRgwo84-iPyRlmsTCIng>.

If a member of the public would like to attend to speak on an agenda item, please email your request to committee.services@broadland.gov.uk no later than 5.00pm on Friday 31 July 2020

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Trevor Holden
Managing Director

DECLARATIONS OF INTEREST AT MEETINGS

When declaring an interest at a meeting Members are asked to indicate whether their interest in the matter is pecuniary, or if the matter relates to, or affects a pecuniary interest they have, or if it is another type of interest. Members are required to identify the nature of the interest and the agenda item to which it relates. In the case of other interests, the member may speak and vote. If it is a pecuniary interest, the member must withdraw from the meeting when it is discussed. If it affects or relates to a pecuniary interest the member has, they have the right to make representations to the meeting as a member of the public but must then withdraw from the meeting. Members are also requested when appropriate to make any declarations under the Code of Practice on Planning and Judicial matters.

Have you declared the interest in the register of interests as a pecuniary interest? If Yes, you will need to withdraw from the room when it is discussed.

Does the interest directly:

1. Affect yours, or your spouse / partner's financial position?
2. Relate to the determining of any approval, consent, licence, permission or registration in relation to you or your spouse / partner?
3. Relate to a contract you, or your spouse / partner have with the Council
4. Affect land you or your spouse / partner own
5. Affect a company that you or your partner own, or have a shareholding in

If the answer is "yes" to any of the above, it is likely to be pecuniary.

Please refer to the guidance given on declaring pecuniary interests in the register of interest forms. If you have a pecuniary interest, you will need to inform the meeting and then withdraw from the room when it is discussed. If it has not been previously declared, you will also need to notify the Monitoring Officer within 28 days.

Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?

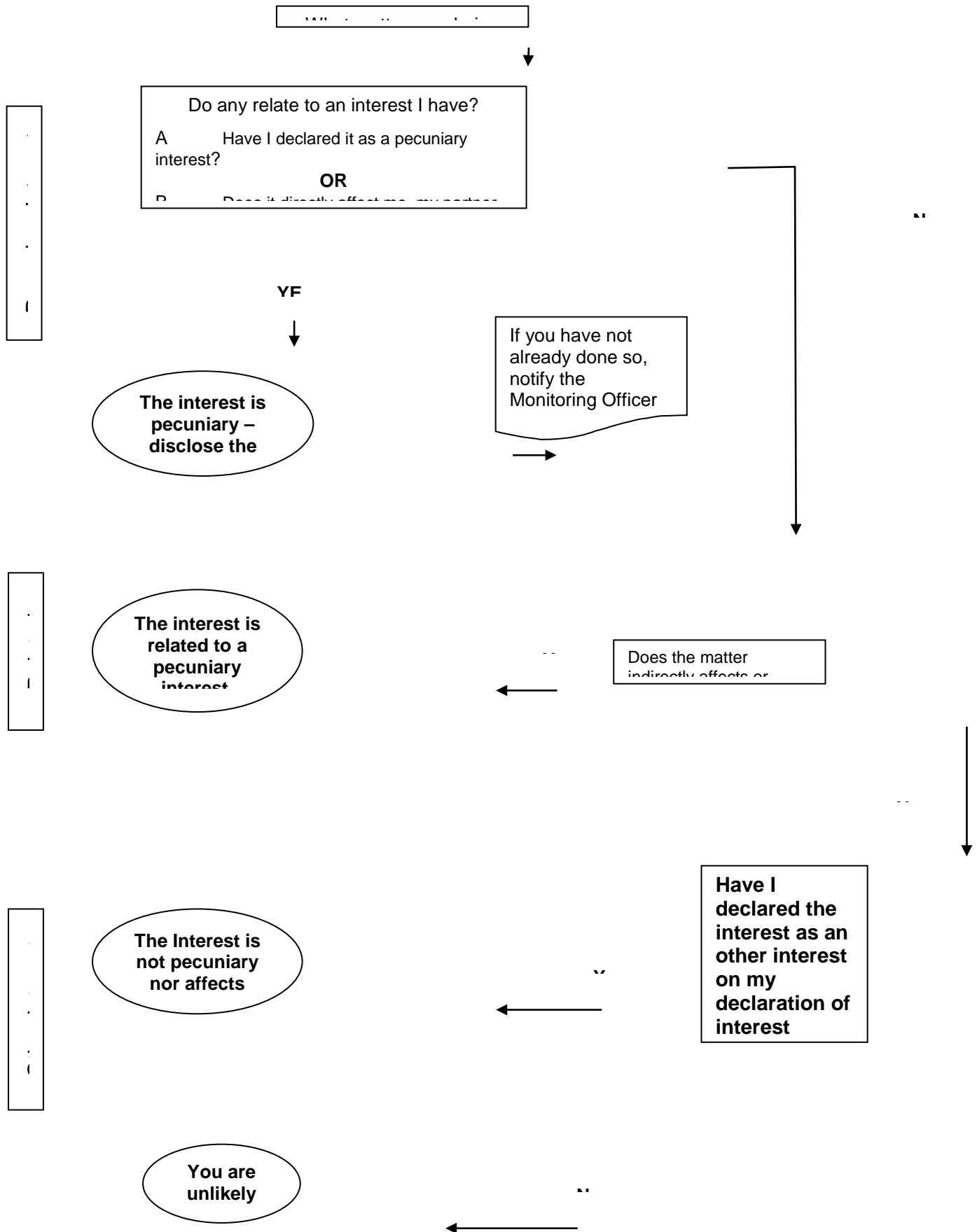
If yes, you need to inform the meeting. When it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.

Is the interest not related to any of the above? If so, it is likely to be another interest. You will need to declare the interest, but may participate in discussion and voting on the item.

Have you made any statements or undertaken any actions that would indicate that you have a closed mind on a matter under discussion? If so, you may be predetermined on the issue; you will need to inform the meeting, and when it is discussed, you will have the right to make representations to the meeting as a member of the public, but must then withdraw from the meeting.

**FOR GUIDANCE REFER TO THE FLOWCHART OVERLEAF
PLEASE REFER ANY QUERIES TO THE MONITORING OFFICER
IN THE FIRST INSTANCE**

DECLARING INTERESTS FLOWCHART – QUESTIONS TO ASK YOURSELF



Minutes of a meeting of the **Wellbeing Panel** held via video link on **Wednesday 8 July 2020 at 6pm.**

A roll call was taken and the following Members were present:

	Cllr F Whymark – Chairman	
Cllr A D Crotch	Cllr S Lawn	Cllr L A Starling
Cllr R R Foulger	Cllr S M Prutton	Cllr D M Thomas
Cllr N J Harpley (Minute 16 only)	Cllr N C Shaw	

Also in attendance were the Director of People and Communities, the Assistant Director Individuals and Families, the Housing and Health Manager and the Committee Officer (DM).

13 DECLARATIONS OF INTEREST UNDER PROCEDURAL RULE NO 8

No declarations were made

14 APOLOGIES FOR ABSENCE

No apologies were received.

15 MINUTES

The minutes of the Wellbeing Panel meeting held on 7 October 2019 and the concurrent meeting of the Economic Success and Wellbeing Panels held on 20 November 2019 were confirmed as a correct record and signed by the Chairman.

16 MATTERS ARISING

In response to a question relating to Minute no 11 of the meeting on 7 October 2019 and partnership working with the Norfolk and Suffolk Foundation Trust (NSFT), officers commented that mental health and wellbeing continued to be a key aspect for the Council, particularly in the current climate and a number of initiatives were ongoing with a wide range of partner organisations involved. The Council continued to work with the NSFT on the complicated issue surrounding discharge arrangements for people leaving in-patient mental health services. Providing the right transition remained crucial and funding had recently been secured to help with ongoing work in this respect. The Council was also working closely with Adult Community Health, particularly during the current Covid-19 crisis to

understand where the issues were and to link with the work of the NSFT and with Change, Grow, Live, the voluntary sector organisation specialising in substance misuse and criminal justice intervention projects. Officers were constantly looking to develop a range of options for working with partners. Mental health issues often led on from fundamental issues relating to housing needs and debt management and support for these initial issues contributed to a longer term recovery plan.

17 ALIGNMENT OF MANDATORY LICENSEABLE HOUSES IN MULTIPLE OCCUPATION FEES ACROSS THE TWO COUNCILS

Members considered the Cabinet report recommending revisions to the chargeable fees for mandatory licensable houses in multiple occupation (HMOs). The Housing and Health Manager went through the report in great detail explaining the background to the proposal to introduce a single licence fee across both Councils to embrace the one officer team approach to the updated delivery of the service. Work had taken place to develop a common service delivery including the inspection forms, standardised letters, licence conditions etc. and the next phase was for a single licence fee.

Arrangements for licensing HMOs had been affected by changes in the legislation in October 2018 requiring any HMO with 5+ occupants to be licenced. Prior to October 2018 the requirement was for 3-storey properties only to be licenced and there had only been one property in Broadland which required a licence. The new legislation required the need for more detailed checks and inspections of properties, facilities and landlords. These changes were now reflected in the proposed fees. Officers had examined in detail the new processes required for licensing HMOs across both Councils and had then applied accurate costings to this process.

The Housing and Health Manager drew attention to the current and proposed fees set out in the report: the current fee for Broadland was £593 per licence based on 5 occupants with an additional charge of £28.50 for each additional occupant. The average occupancy of a typical Broadland HMO was 7/8 occupants and the typical licence fee currently paid would therefore be £649 / £677. The fee for South Norfolk was currently £853. The proposed new fee was £825 (with a £133 fee for any variation to the licence - for example a building extension). The fee was applicable for 5 years and would equate to an annual charge of £165 which could be paid in instalments. The proposed renewal fee was £514. In response to queries regarding the actual percentage increase for Broadland landlords, officers undertook to include percentage increases in the report when it was considered by Cabinet. Members noted the comparison fees with other local authorities with some Members concerned that the fees were higher than most other Norfolk Authorities and a view that the other examples authorities shown might not offer realistic comparisons.

The Housing and Health Manger stressed that she was confident the procedure proposed was an accurate reflection of work involved in licensing a HMO and the charges applied accurately reflected the costs associated with the work. She made reference to case law, in particular a successful case against Westminster Council for overcharging for licence fees. The fees needed to be accurate, reasonable and proportionate and needed to reflect the actual costs of delivering the service. It was not acceptable to make a profit.

HMOs were a vital source of affordable accommodation and it was critical that measures were in place to protect residents by ensuring a robust inspection and licence regime. The shared delivery of this regime across both Councils by a single officer team required a common fee which accurately reflected the cost of the single service. It was hoped that fees proposed arising from the robust and detailed process identification would be acceptable and affordable for landlords and that they would not pass the cost onto tenants.

A number of concerns were raised by Members about the proposal. There was concern that the charges would be passed onto tenants and the increase in charges for Broadland landlords was too high compared to the current fee. It was however noted that the weekly increase to landlords was circa £3.17 per week which some Members felt was not unreasonable.

Some Members were of the view that, as two sovereign authorities, there was no requirement to adopt common charges, whilst others acknowledged the rationale and necessity of having a common charge. There were concerns about the costings / timings for some of the processes detailed in the report for example the time taken to prepare certain documents and the actual hourly officer cost which appeared high. Officers reiterated that the processes had been examined thoroughly and robustly and the costs associated applied accurately. The hourly staff cost had been provided by the finance team and included on-costs and all other costs associated with the delivery of the service and were mindful of the commercial environment in terms of delivering services and covering costs. Officers reiterated that they would be happy to justify the costings in the event of a legal challenge. This could not be the case if different charges were adopted across both Councils for a common officer service.

Officers pointed out that, having regard to issues associated with County Lines and modern slavery, it was vital that measures were in place to protect vulnerable people and they were keen to ensure the processes reflected these changing pressures.

In response to a concern that the fees were being increased to bring them in

line with charges at South Norfolk, officers reminded Members that the whole process had begun with a fundamental review of the procedures for dealing with licensing of HMOs by one officer team and costings then applied to this new service. The existing charges at Broadland / South Norfolk had not been the starting point. The process was transparent and honest and a common fee would reflect the integrity of the work undertaken.

In response to concerns expressed about the current fees being charged at Broadland and why these were no longer considered appropriate, the Housing and Health Manager reminded Members that there had been changes introduced in 2018 which required a revised approach and that the alignment of the two officer teams had provided the opportunity to refresh the service and reflect on changes to the processes and the costs associated with these. The previous fees had related to a different process.

In answer a question, the Housing and Health Manager confirmed that inspections were carried out during the 5 year period of the licence; the frequency of these had been driven by a risk assessment and tended to result in annual inspections. A suggestion was made that it might be useful to charge a separate fee for inspections and that landlords be charged for the actual number of inspections necessary as this could act as an incentive to maintain high standards.

It was then proposed, duly seconded, to recommend Cabinet to support the officer's recommendations regarding the setting of a new one team fee for mandatory licensable HMOs. On being put to the vote, by way of a roll call, however, the proposal was lost.

Officers sought some direction in terms of how they should develop the report for consideration by Cabinet which the Panel would be able to endorse and reiterated that, whilst the two sovereign Councils could adopt different practices, in this respect, the application of different fees for a common service would not be defensible. Members noted that the Cabinet report would be considered by Overview and Scrutiny Committee prior to consideration by Cabinet and that the matter would get a further review at that stage.

It was noted that the report was also being considered by the People and Communities Policy Committee at South Norfolk the following day.

The Chairman commented that the Panel had robustly challenged the report but it was important that the fees charged were legally defensible and to that end he welcomed the officers' reassurance that they were satisfied the single fee being proposed was defensible. It was stated that it was also important that the Council continued to put residents first and not undermine the

standard of the service provided by cutting out elements of the service to reduce costs.

The meeting closed at 7.34pm

DRAFT

GREATER NORWICH HOMELESSNESS STRATEGY 2020-2025

SOUTH NORFOLK AND BROADLAND ROUGH SLEEPER STATEMENT 2020-2022.

Report Author(s): Victoria Parsons
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Portfolio: Housing and Wellbeing

Ward(s) Affected: All

Purpose of the Report:

To present the Greater Norwich Homelessness Strategy 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022.

Recommendations:

1. Panel to note and comment on the Greater Norwich Homelessness Strategy 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022
2. Panel to recommend adoption of the Greater Norwich Homelessness Strategy 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022 to Cabinet.

1 SUMMARY

- 1.1 This report presents the appended Greater Norwich Homelessness Strategy
- 1.2 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022 for publication and provides background to the statutory and operational context within which both documents were developed.

2 BACKGROUND

- 2.1 The Homelessness Reduction Act 2017 (HRA) places additional duties on Local Authorities (LAs) that are designed to ensure all households at risk of homelessness receive earlier and more effective interventions. Introduced in April 2018, the act requires authorities to:
 - i. Provide advice and guidance for all households approaching the LA and for the guidance to meet the needs of certain listed groups including those leaving prison, hospital or care and those with mental health issues.
 - ii. To **prevent** those threatened with homelessness from becoming homeless
 - iii. To **relieve** homelessness for those who are homeless

Both **prevention** and **relief** duties last for 56 days but can be ended in several ways in that time.

- 2.2 Additionally, Local Authorities have a statutory duty under the Homelessness Act 2002 to publish Homelessness Strategies at least once every 5 years. Broadland and South Norfolk councils take a sub-regional approach with Norwich City Council in the review and formation of these strategies in acknowledgement of our long history of working in partnership in addition to the movement of residents across district boundaries and the location of services. The document before you is the 4th time we have collaborated on a Homelessness Strategy.
- 2.3 Following publication of the Government's Rough Sleeper Strategy 2018-2022, a request was made by central government that the Homelessness Strategies include a specific focus on rough sleeping. Norwich City Council have an existing, separate Rough Sleeping Strategy which is valid until 2022 while South Norfolk and Broadland Councils do not.
- 2.4 In order to meet our duties and provide direction to service delivery, a South Norfolk and Broadland Rough Sleeper Statement has been developed for the period 2020-2022. The statement sets out in clear terms the actions we are going to explore to end rough sleeping across South Norfolk and Broadland.
- 2.5 Development of both documents have also run in parallel with the Best in Class Housing Offer project, where the restructure of the Housing and Benefits teams have provided a key opportunity to undertake a radical reimagining of how the councils deliver the housing and homelessness service.

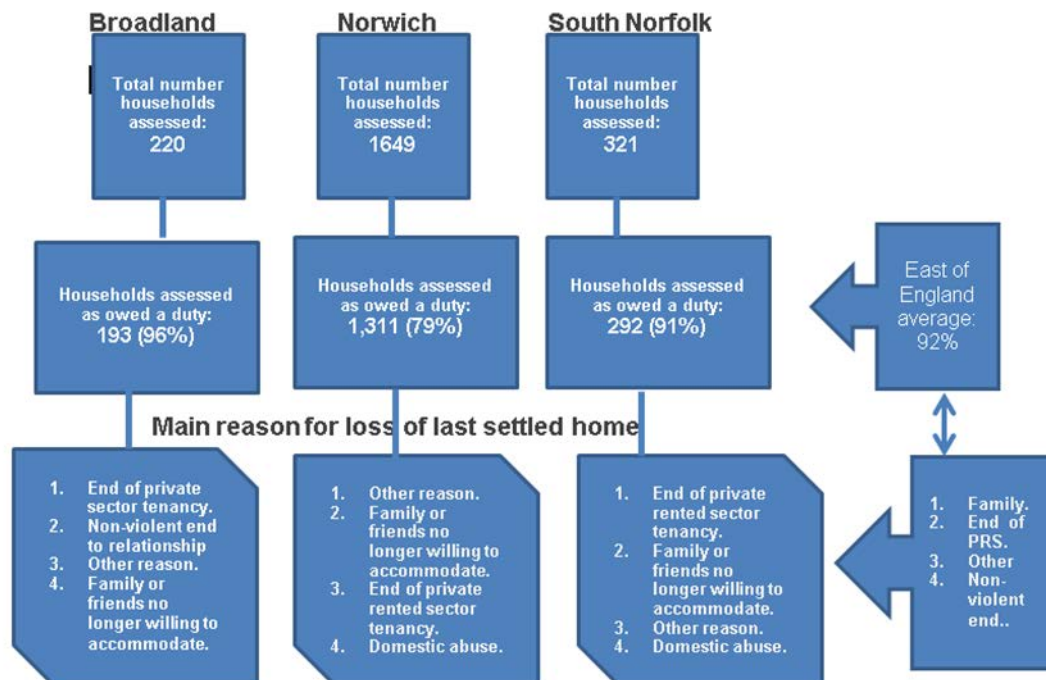
- 2.6 Using funding awarded from the Local Government's Association's (LGA) Housing Advisor Programme (HAP) the councils are working with an external consultancy firm to undertake in depth reviews in the following key areas.
- i. Exploring the alignment and redesign of our Interim and Temporary Accommodation Pathway
 - ii. Redesign of a Shared Social Housing system
- 2.7 Working with the consultants has enabled the councils to procure additional value into the redesign work through the provision of an impartial viewpoint coupled with a background of innovative thinking when developing customer solutions, partnership working and operating across the public/private sectors. Through this the councils have the opportunity to develop a housing service that is the first of its kind.
- 2.8 Findings from the review and recommendations for a leading service offer will be presented to members in the Autumn. However, at the core of all of these elements of the council's housing offer is; a customer centred offer that promotes and increases resilience and provides wrap-around support for those who are in need of extra assistance; the prevention of homelessness and promotion of sustainable housing; and a commitment to working in partnership to achieve it.

3 CURRENT POSITION/FINDINGS

3.1 The Greater Norwich Homelessness Strategy 2020-2025

- 3.2 The Homelessness strategy contains data from the initial 12 months following the introduction of the HRA, and using the Government's new standardised reporting system H-CLIC. However it should be noted that this data is still considered experimental due to differences in software implementation timelines.
- 3.3 As an overview of demand, the chart at 3.4 below provides information on the numbers of households accessing our Housing Options services in 2018/19. The data includes those approaches from households who are homeless or threatened with homelessness and where prevent and/or relief duties under the HRA may apply and does not represent the sum total of approaches to our Housing teams.

3.4 Numbers of households accessing Housing Options Services in 2018/19, presenting as homeless or threatened with homelessness.



3.5 In spite of the difference in numbers and the potential contrast of approaches from urban and rural locations, there are similarities in terms of the main reason for loss of last settled home, with End of private rented sector tenancy and Family or friends no longer willing to accommodate appearing in the top four reasons across the councils in the sub-region.

3.6 To provide focus, the Homelessness Strategy sets out four priorities under which sits a series of actions which are ambitious in scope, realistic to achieve and reflects the urban/rural context within which the strategy is located.

3.7 The proposed priority areas are:

- i. Domestic Abuse
- ii. Preventing Homelessness
- iii. Single and Youth Homelessness
- iv. Financial Inclusion, Welfare Reform and Economic Growth

3.8 The priorities were determined through an analysis of homelessness data, such as that given in 3.4 above, a review of national research and literature, the outcomes of a set of partner engagement workshops and a small sample of service user interviews. The priorities relate not only to actions the local authorities will seek to take but also those in conjunction with local partner organisations.

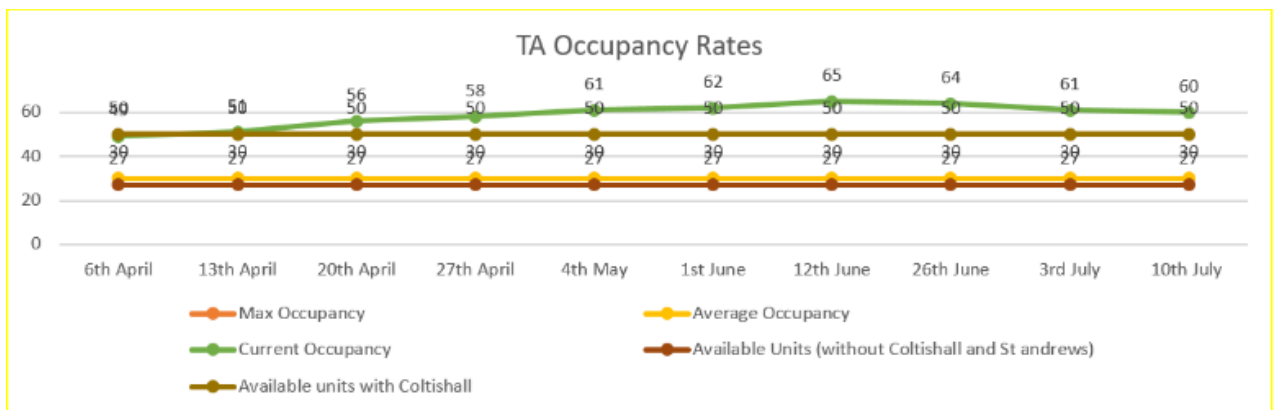
3.9 The South Norfolk and Broadland Rough Sleeper Statement 2020-2022

- 3.10 Until 2019, rough sleeping numbers in South Norfolk and Broadland had been underestimated. However, an audit undertaken in February 2019 revealed 65 reports of rough sleeping between January 2018 and January 2019. Headline statistics of this audit include; 71% of rough sleepers were male, 10% were over the age of 56; and 43% had indicators for mental ill health and drug and alcohol misuse.
- 3.11 Following this, South Norfolk and Broadland were successful in joint bids for funding through the Ministry for Housing, Communities and Local Government's (MHCLG) Rough Sleeper Initiative (RSI) and Rapid Rehousing Pathway (RRP). The First Step Service was developed with this funding and provides rapid access accommodation, personal budgets to overcome barriers to accessing accommodation and two Rough Sleeping Coordinators to provide support for those rough sleeping.
- 3.12 First Step was launched in August 2019 and in its first eleven months of operation, have recorded reports of 127 people rough sleeping or at risk of rough sleeping. Of these 60% have been supported into accessing accommodation and 41% have moved into long-term housing, such as supported accommodation, a socially rented tenancy and securing their own housing.
- 3.13 The success of the project has ensured that the councils were successful in their bid for funding for the 2020/21 year. This enables not only the continuation of the service but allows us to enhance it by opening additional Somewhere Safe to Stay Hubs and staging post accommodation, provision for tenancy start up budgets to enable those moving into long term accommodation to purchase basic equipment. A newly created post of an Assessment and Resettlement Officer will work alongside the Rough Sleeping Coordinators in supporting individuals into the hub or interim accommodation and working with them to secure suitable long-term alternatives. Finally, the councils will be looking to secure units to introduce a Housing First model for those who require additional support.
- 3.14 In addition, in a joint bid with Norwich City Council, South Norfolk and Broadland have secured funding for a Drug and Alcohol Recovery Coordinator. The worker will be located within the Norwich Rough Sleeper Service – Pathways, with whom the First Step service work closely. The coordinator will work with individuals who are rough sleeping across the sub-region from point of entry into the service and through their treatment/recovery journey.
- 3.15 The Rough Sleeper Statement sets out 3 strategic objectives:
- i. Early intervention and prevention of homelessness
 - ii. Improve the range of Temporary Accommodation options across the two councils
 - iii. Reduce the incidence of rough sleeping

3.16 COVID-19

- 3.17 The Coronavirus outbreak and the implementation of nationwide lockdown requirements saw a significant rise in the number of people who are rough sleeping or at risk of rough sleeping supported and accommodated by South Norfolk and Broadland. The predominant source of this increase stemmed from those who had transient arrangements for their accommodation, otherwise known as hidden homelessness. This has provided evidence that although rough sleeping remains very low within both districts, there is a steady number of people who have very little control over their accommodation and remain on the cusp of rough sleeping.
- 3.18 Early in the lockdown period we were asked by central government to offer accommodation to anyone who was street homeless or living in dormitory style emergency accommodation, known as 'Everyone In'. South Norfolk and Broadland Councils are proud to say that they were able to offer accommodation to all those rough sleeping across the local authority areas.
- 3.19 The graph at 3.19 below provides an example of the increase in demand for temporary accommodation experienced by the councils. The increase is accounted for by those accommodated under 'Everyone In' and also increased approaches to the council's Housing and Benefits team by those at risk of homelessness.

3.20 Graph showing temporary accommodation occupancy rates



- 3.21 In terms of recovery from Covid-19, the councils are preparing for this demand to increase further, particularly as we approach:

- The easing of lockdown restrictions providing people experiencing domestic abuse with an opportunity to seek help or flee
- The easing of lockdown restrictions meaning that people experiencing relationship breakdown or where family or friends no longer willing to accommodate may seek housing assistance
- The removal of the central government assisted furlough scheme leading to risk of increased job losses
- The ending in August of the moratorium on evictions

- The ending of temporary contracts with accommodation providers such as hotels and large venues that have been accommodating rough sleepers and other households at risk of homelessness
- The removal of additional support for those who are NRPF

3.22 The priorities outlined within the Greater Norwich Homelessness Strategy and the South Norfolk and Broadland Rough Sleeper Statement have been reviewed under the lens of Covid-19 and found to still be highly relevant and more than ever present an opportunity for us to work collaboratively at a local and county wide level to support recovery and prevent homelessness.

4 PROPOSED ACTION

- 4.1 It is proposed that in order to meet our statutory duty under the Homelessness Act 2002, and to make public the councils strategic priorities to prevent homelessness that South Norfolk and Broadland adopt the appended Greater Norwich Homelessness Strategy 2020-2025.
- 4.2 It is further proposed that, to comply with the request from Central Government to include a specific focus on rough sleeping, the councils adopt the appended South Norfolk and Broadland Rough Sleeper Statement 2020-2022.
- 4.3 From 2022, as with the Greater Norwich Homelessness Strategy, it is proposed that the councils produce an aligned Greater Norwich Rough Sleeping Strategy. This would reflect our understanding that those who are rough sleeping may migrate into an urban area for reasons of safety and proximity to some services, or they may choose to be less visible in the more rural areas of the sub-region.

5 ISSUES AND RISKS

- 5.1 **Resource Implications** – There are no resource implications beyond the existing staff structure and resources allocated for the transformation and improvement programme within the Housing and Benefits team.
- 5.2 **Legal Implications** – The strategy and statement is proposed in order for us to meet our duties under the Homelessness Act 2002.
- 5.3 **Equality Implications** – An Equalities and Communities Impact Assessment is appended to this report
- 5.4 **Environmental Impact** – There are no known environmental impacts.
- 5.5 **Crime and Disorder** – In working to prevent homelessness and rough sleeping through the provision of accommodation and support, including for those who have had contact with the criminal justice system, it is hoped to prevent instances of offending and reoffending.
- 5.6 **Risks** – The current Homelessness Strategy was valid until 31st March 2020. Although production has been delayed with the Covid-19 outbreak, if we do not

publish a new strategy we are at risk of non-compliance with our statutory duty under the Homelessness Act 2002.

6 CONCLUSION

- 6.1 Broadland, South Norfolk and Norwich have a long history in working together to prevent homelessness. Adoption of both the Greater Norwich Homelessness Strategy 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022 provides an overarching and complimentary response to the prevention of homelessness and the ending of rough sleeping in our area.
- 6.2 As stated above, the documents will form part of a Best in Class Housing Offer that seeks to deliver a customer centred offer that promotes and increases resilience and provides wrap-around support for those who are in need of extra assistance; the prevention of homelessness and promotion of sustainable housing; and a commitment to working in partnership to achieve it.
- 6.3 Progress of the documents had been delayed with the outbreak of Covid-19. However, this provides the councils with an opportunity to publish strategic priorities that are timely, cognisant with the anticipated increase in demand and subsequent support needs and links into recovery activity at a local and county wide level.

7 RECOMMENDATIONS

- 7.1 Panel to note and comment on the Greater Norwich Homelessness Strategy 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022.
- 7.2 Panel to recommend adoption of the Greater Norwich Homelessness Strategy 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022 to Cabinet.

Background Papers

There are no background papers

Greater Norwich Homelessness Strategy 2020-25

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Introduction

This document marks the fourth occasion that Broadland, Norwich City and South Norfolk Councils have worked together to develop a homelessness strategy for the Greater Norwich area.

In doing so, we are working from the following key assumptions:

- We will offer wraparound, multi-agency services that puts the individual or household at the centre in order to prevent homelessness.
- We want to prevent and alleviate homelessness in addition to reducing the drivers of homelessness
- We will work in partnership with other statutory services, organisations and the voluntary and community sectors to achieve this.

In order to meet these assumptions, we are focussing on the following four priority areas:

1. Domestic Abuse
2. Preventing Homelessness
3. Single and Youth Homelessness
4. Financial Inclusion, Welfare Reform and Economic Growth

Furthermore, Mental Ill Health can be a significant factor in increasing the risk of homelessness in addition, for those who are homeless or at risk of homelessness there can be a higher incidence of a negative impact on mental health. In this respect, acknowledgement of Mental Health is woven through our priorities instead of as a stand-alone area.

As highlighted above, as local authorities, we cannot work in isolation to prevent homelessness and we would like to thank our Greater Norwich Homelessness Forum (GNHF) partners and wider partners for their input into the development of this strategy and commitment to work with us to implement the actions agreed.

Partner Organisations who have contributed to the development of this draft strategy are:

Adult Social Care Commissioning - Norfolk County Council
 Anchor Project – Leeway
 Anglia Care Trust
 Aylsham Care Trust (ACT)
 Breckland District Council
 Change, Grow, Live (CGL)
 Children's Services Leaving Care Team

Clarion Housing
Community Chaplaincy Norfolk
DWP
Integrated Offender Management - Norfolk Constabulary
Making Every Adult Matter (MEAM)
Mancroft Advice Project
National Probation Service
Norfolk and Suffolk Community Rehabilitation Company (NSCRC)
Norfolk and Suffolk Foundation Trust (NSFT)
Norfolk Community Law Service (NCLS)
Notting Hill Genesis
Orwell Housing Association Ltd
Saffron Housing Trust
Shelter
Solo Housing
Soul Foundation
St Giles Trust
St Martins Housing
Stronger Futures Leaving Care Team - Norfolk County Council
The Benjamin Foundation
The Feed
The Magdalene Group
YMCA
Your Own Place CIC
Youth Offending Team (YOT)

Contained within this strategy is an outline of key legislation implemented during the period of the previous strategy, an overview of the local and national picture. The strategy also lists our four priority areas, proposed actions and the evidence and rationale behind them.

The consultation period ran from 12pm Friday 6th March 2020 until 11:59pm on Friday 01 June 2020¹.

COVID-19

i. Introduction

Whilst this strategy was out for public consultation the Covid-19 pandemic hit the world. Everyone has been affected by Covid-19 to a lesser or greater extent. As local housing authorities we were asked by central government to “get everyone in.” We were asked by central government to “focus on people who are, or are at risk of, sleeping rough, and those who are in accommodation where it is difficult to self-isolate, such as shelters and assessment centres.” To date we have accommodated well over 100 people into safe accommodation and moved people into more permanent homes. This vital work has been successful in saving lives and keeping people safe whilst we experienced the surge in the pandemic. This work has involved

¹ Consultation was extended because of Covid-19 pandemic.

close work with our County Council, health, Police and voluntary sector colleagues. Community help hubs were formed managing the delivery of food supplies and medication to the most vulnerable in the greater Norwich area.

ii What have we learnt from Covid-19?

There has been tremendous pressures placed on households through the country and locally. It is likely that as a result of the pandemic that there will be medium to long term affects to our economy and local population placing increasing numbers of people at risk of homelessness. In the short term we have seen worrying increases in the number of reported domestic abuse cases, especially in Norwich. Also we have seen a number of businesses close and shed jobs as a result of the economic downturn. There is genuine concern that when the ban on evictions is ended in August 2020 we will begin to see a spike in private sector evictions as a result of households struggling to juggle their household finances with increasing debt. A sign of this has been the increase of households in receipt of welfare payments to help with their housing and daily living costs. It is not clear yet for how long the effects of the pandemic will have on the economy as whole. In a recent survey carried out by the Resolution Foundation found that, "...34 per cent of new UC claimants...are having trouble keeping up with bill payments, 42 per cent have cut back on spending to prioritise housing costs, and over half have already dipped into their savings."² It is likely that the following groups will continue to be affected by the pandemic:

- Increased levels of domestic abuse
- Young people
- Social renters
- People living in the private rented sector

The government has provided significant help and support to people affected by the pandemic, however, help such as the uprating of Local Housing Allowance levels will make little difference to those households already affected by the continuing household benefit cap that has not been lifted or temporarily removed.

iii Recovery plans

Each of the three local authorities in greater Norwich has released a recovery or blueprint plan to focus our efforts to help those in our communities worst affected by the pandemic including those who have lost their jobs, are vulnerable or facing uncertain financial times in their lives as well as building and harnessing the social capital that came to the fore as a result of the adversity that was faced.

We are confident that the priorities that we set in the draft consultation strategy are still relevant in light of the recent pandemic but we will ensure that we will continue review and monitor these priorities during the life of the strategy.

² Page 65, *This time it's different – Universal Credits first recession*, (Resolution Foundation, May 2020).

1. Strategic Context and Purpose

The Homelessness Act 2002 requires each local housing authority to review homelessness in its area and to develop a new homelessness strategy every five years. The Homelessness Code of Guidance provides guidance on housing authorities' duties to carry out a homelessness review and to formulate and publish a strategy based on the results of that review.

1.1 Rough Sleeping

For a number of years Norwich has produced a rough sleeping strategy to help tackle and reduce the number of rough sleepers in the city. The current Norwich Tackling Rough Sleeping Strategy 2017-22 will run to the end of 2022, with a new strategy covering the Greater Norwich area running from 2022 (until 2027). South Norfolk and Broadland Councils will publish a Rough Sleeping Statement in 2020 to run until 2022, to cover the interim period before the introduction of the new Greater Norwich Rough Sleeping Strategy. The reason why we publish a separate rough sleeping and homelessness strategy is that we want to give clear focus and ownership of our efforts to reduce rough sleeping in our districts.

The focus of this strategy will be to look at the determinants of homelessness, such as:

- Youth and Single Homelessness
- Domestic Abuse
- Relationship Breakdown
- Low Income
- How we can strengthen our prevention of homelessness duties

1.2 Homelessness Reduction Act (HRA)

The Homelessness Reduction Act was implemented in April 2018.

In addition to the HRA there are two other sets of new regulations:

- The Homelessness Reduction Act (Commencement and Transitional and Savings Provisions) Regulations 2018.
- The Homelessness (Review Procedure) regulations 2018, which set out the procedures for conducting reviews under the Act and list the public authorities to which the duty to refer applies.

As well as the aforementioned, the government published a new statutory Homelessness Code of Guidance, which we as local housing authorities must have regard.

1.3 Duty to Refer

The HRA also brings in new duties to notify a local housing authority of service users they think may be homeless or at risk. This new duty has the potential to prevent more people from becoming homeless by encouraging public bodies to reduce and prevent homelessness.

In Greater Norwich alongside partners we have looked to strengthen this approach by leading and supporting work to produce a number of protocol documents that sets out our commitment to prevent homelessness. These protocols are:

- Greater Norwich & Breckland Criminal Justice Homelessness Prevention Protocol
- Joint Protocol to Address the Needs of Homeless Young People in Norfolk
- Proposed Norfolk Mental Health Hospital Discharge and Homelessness Prevention Protocol

Through this strategy we will commit to ensuring that these protocols are successful, that we are working sooner with individuals and other organisations to help stop homelessness before it begins.

In addition to this we are committed to improving the pathway for people who are homeless leaving hospital settings such as the Norfolk and Norwich University hospital and Hellesdon Hospital and will actively support and promote the long term implementation of initiatives such as District Direct through the actions in this strategy.

2. National and Local Picture of Housing Market

Nationally and locally the housing market has been surrounded by uncertainty caused by the following factors:

- Affordability issues
- Lack of stock
- Continuing political uncertainty
- Fears of interest rate rises³

The government (in 2018) committed itself to a target of delivering an additional 300,000 homes up to the mid-2020s. This target is short of the 340,000 units per year (for fifteen years) that the National Housing Federation (NHF) and Crisis study projected that are required to meet housing need. The actual number of net additional dwellings delivered over the past six years is significantly short of these forecasts showing that meeting the required number of homes will be difficult to achieve in the future if the current housing market conditions continue.

³ Royal Institute of Chartered Surveyors (RICS), *Housing Forecast 2019*, London Dec 2018.

Net additional dwellings - England, 2012/13 to 2017/18⁴

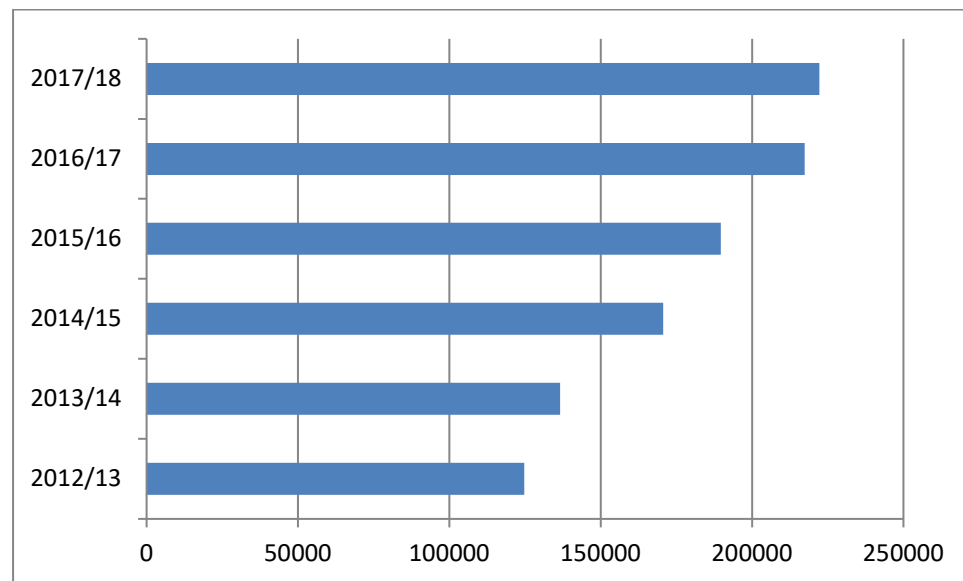


Table 1

2.1 Greater Norwich Housing Market

UK house prices grew by 0.7% in the year to July 2019⁵. In Greater Norwich we have seen larger increases in the average house price of 1.06%, 2.93%, and 2.30% in Norwich, South Norfolk and Broadland respectively pricing more people out of the housing market.

Period	BDC	NCC	SNC	UK average
July 2018	£273,721	£226,359	£285,264	£231,187
July 2019	£280,022	£228,773	£293,633	£232,710

Table 2

Measure	Broadland	Norwich	South Norfolk	Eastern Region
House price to earnings ratio ⁶	9.2 to 1	7.6 to 1	9.1 to 1	10 to 1
Lower quartile house price to earnings ratio ⁷	10 to 1	8.7 to 1	10.3 to 1	10.1 to 1

Table 3

⁴ MHCLG, *Housing supply; net additional dwellings*, England 2017/18, November 2018.

⁵ Source: <https://www.gov.uk/government/publications/uk-house-price-index-summary-july-2019/uk-house-price-index-summary-july-2019#about-the-uk-house-price-index>, Accessed on 19/09/2019.

⁶ Source: Hometrack (accessed 19/08/2019): based on data from the latest Annual Survey of Hours and Earnings and sales and valuations over the last 12 months.

⁷ Ibid.

Whilst house prices to earnings ratios are similar in Broadland and South Norfolk areas compared to the East of England, in Norwich these ratios are lower. However, wages tend to be lower in Norwich than South Norfolk and Broadland making the option of people owning their own home more difficult especially for those people on lower incomes.⁸

2.2 Delivery of Affordable Housing⁹

The Strategic Housing Market Assessment 2017 identified the housing need per year across Greater Norwich between 2015-2036 as:

Greater Norwich		Market Housing	Affordable Housing	TOTAL
Flat	1 bedroom	61 (1,285)	130 (2,725)	191 (4,011)
	2+ bedrooms	64 (1,352)	67 (1,404)	131 (2,756)
House	2 bedrooms	154 (3,227)	136 (2,863)	290 (6,090)
	3 bedrooms	781 (16,393)	154 (3,238)	935 (19,632)
	4 bedrooms	237 (4,982)	31 (661)	268 (5,642)
	5+ bedrooms	58 (1,215)	7 (140)	65 (1,355)
Total per year (avg.)		1,355	525	1,880
Total for period of SHMA		28,456	11,030	39,486

Table 4: Source: Fig 83 Central Norfolk SHMA 2017 (annualised, figures rounded)

The affordable housing is further split into affordable housing for rent and for low cost home ownership as follows:

GREATER NORWICH		Affordable Housing for Rent	Low Cost Home Ownership	Total
Flat	1 bedroom	118 (2,488)	11 (238)	129 (2,725)
	2+ bedrooms	54 (1,131)	13 (273)	67 (1,404)
House	2 bedrooms	103 (2,153)	34 (710)	137 (2,863)
	3 bedrooms	108 (2,263)	46 (975)	154 (3,238)
	4+ bedrooms	30 (629)	8 (173)	38 (801)
Total per year (avg.)		413	113	525
Total for period of SHMA		8664	2367	11,030

Table 5: Source: Fig 85 Central Norfolk SHMA 2017 (annualised, figures rounded)

The Greater Norwich Joint Core Strategy (JCS) uses the Strategic Housing Market Assessment (SHMA) as the evidence base for Policy 4 on housing.

⁸ Further information on wages will be accessible in our Homelessness review document that will be published alongside the final strategy document.

⁹ <https://www.greaternorwichgrowth.org.uk/planning/monitoring/> Accessed on 14/02/2020

The policy requires a percentage of affordable housing to be delivered on all developments of 10 dwellings or more, with 30% affordable housing required on developments of 10-15 dwellings and 33% on developments of 16 dwellings or more.

JCS Policy 4 also requires for a tenure split of affordable housing to be 85% affordable housing for rent and 15% as intermediate tenure.

The SHMA found that in Norwich and Broadland based on 35% of household income, 73% (203 of 278¹⁰) and 71%¹¹ of households in housing need could not afford target rent without help with their housing costs (welfare benefits) compared to 60% in South Norfolk. However, both in South Norfolk and Broadland there is a larger percentage of households able to afford affordable rent/home ownership products due to higher household incomes in those areas.

The Greater Norwich Development Partnership (GNDP) has recently published the Annual Monitoring Report (AMR) for 2018/19, which shows delivery in recent years as:

Indicator	Target	Location	14/15	15/16	16/17	17/18	18/19
Net housing completions	Broadland - 706 pa	Broadland	405	598	644	679	640
	Norwich - 477 pa	Norwich	249	365	445	237	927
	South Norfolk - 863 pa	South Norfolk	1027	765	1162	1118	1212
	Greater Norwich – 2,046 pa	Greater Norwich	1681	1728	2251	2034	2779
Affordable Housing Completions	Greater Norwich - 525 pa	Broadland	98	107	237	177	195
		Norwich	50	25	44	56	137
		South Norfolk	95	90	175	298	392
		Greater Norwich	243	222	456	531	724

Table 6: Source: GNDP AMR 2018/19

This table shows that in 2018/19 affordable housing completions have exceeded the current target of 525 completions per year. This marks the highest level of delivery in the last 7 years and is the first time the annual target has been achieved. This level of delivery is clearly linked to the significant increase in overall housing delivery across the Greater Norwich area.

Continuing to meet the delivery target for affordable homes will remain a challenge however. Changes to the planning system mean that affordable housing cannot be required in certain circumstances e.g. due to the vacant building credit or the prior approval of office conversions (measures which have a particularly significant impact in Norwich City).

Another challenge to the delivery of affordable housing is that it has proved necessary to reduce the level of affordable housing secured on some sites to

¹⁰ Fig 102 Central Norfolk SHMA 2017 (annualised).

¹¹ Ibid.

ensure that developments are viable. The authorities continue to scrutinise viability assessments submitted by developers to ensure that development meets the affordable housing target as far as possible. In addition, a number of section 106 agreements that accompany development include a “claw back” provision, which may mean that additional affordable housing will be delivered later, via a commuted sum, if viability improves.

The Greater Norwich Local Plan, which is being produced by Broadland District Council, Norwich City Council and South Norfolk Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP) and aims to produce an overarching plan which will help to meet local housing and economic growth needs, whilst also protecting and enhancing the environment.

Going forward the GNLP will allocate sites to deliver the required housing numbers, and will have an affordable housing requirement; however, there will be a delay before the affordable homes are completed.

Further information on the proposed GNLP can be found here:

<https://www.gnlp.org.uk/>

3. Homelessness Review Key Findings

3.1 National Picture

3.11 Summary

The Homelessness Monitor: England 2019 concluded the following in its key findings:

- 71% of local authorities reported that homelessness had been increasing.
- The rise since 2010 in the number of households made homeless by the ending of private tenancies seem finally to have peaked.
- After rapid growth of rough sleeping since 2010, numbers have started to level in England.
- There is not enough social housing to meet housing need.
- Private sector rents seem to be falling however; growth in the private rented sector has exposed many more low-income households to higher housing costs.
- The safety net of housing benefit has now effectively ended for the bulk of private tenants in receipt of benefit across the country, whereby post-housing incomes were protected from erosion below basic benefit levels. Young people under 35 particularly badly affected by LHA and working age benefit freezes.
- Further changes to welfare reform could impact negatively on homelessness numbers, specifically the full roll out of Universal Credit.
- Most local authorities provided encouraging evidence that the HRA is enabling councils to help more people in housing need.

3.12 Private rented sector tenancies

Whilst the private sector can provide households with flexibility around types of housing in terms of where people want to live it is still the most common type of housing a person will be living in when someone asks for help at our council's housing options teams. The English Housing Survey 2018-19 found that for private renters, the average length of residence was 4.4 years, compared to 18.1 and 11.6 for owner-occupiers and social renters. Our H-CLIC 2018-19 figures show that we need to do more to keep people in their private rented homes and help stop people having to move and face unnecessary disturbance in their lives.

3.2 Local Picture

3.21 Better Recording of Homelessness

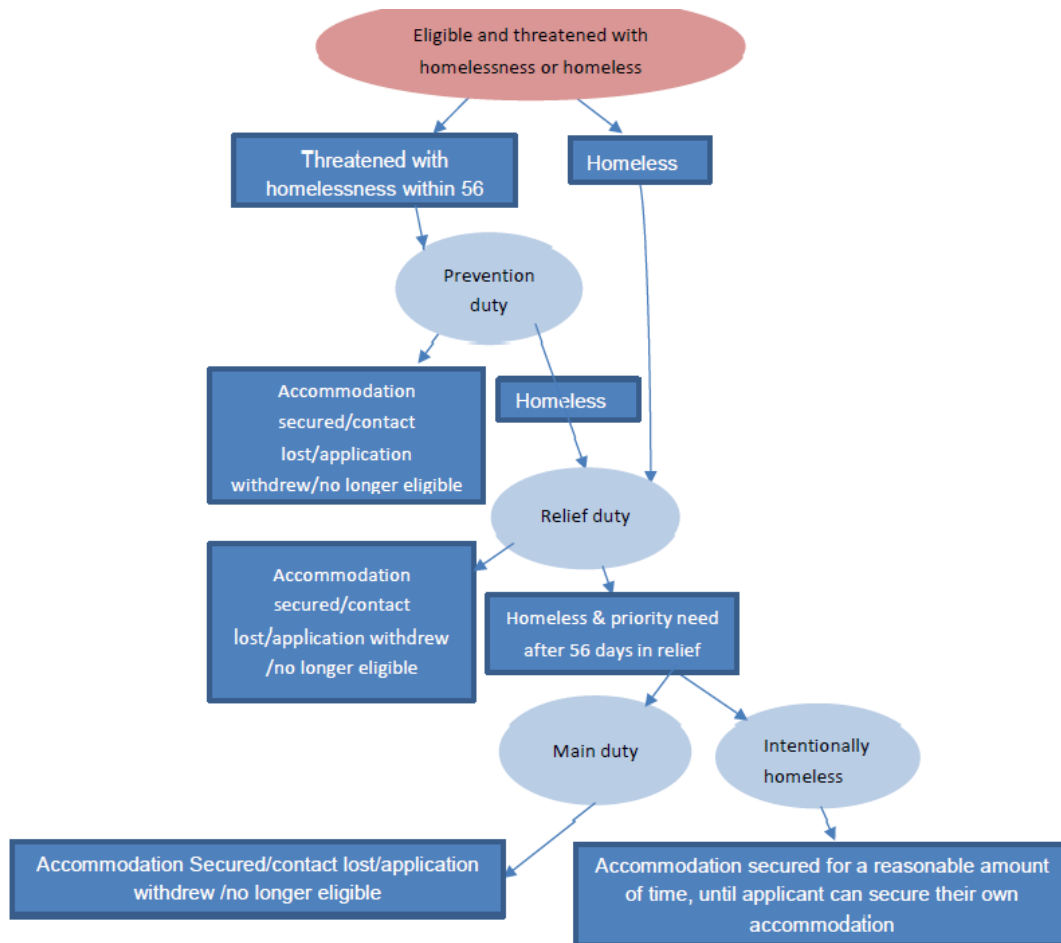
The Homelessness Reduction Act (HRA) 2017 came into effect on 03 April 2018. The act places a greater emphasis on prevention helping all those people affected by homelessness regardless of priority need. The HRA updated the Housing Act 1996, producing new prevention and relief duties for local housing authorities in England.

With the advent of the HRA, local authorities now use a more accurate method of measuring homelessness compared to previous monitoring regimes. This data should provide local authorities nationally and locally of measuring trends in homelessness and specifically which households are most at risk. Future strategies and reviews will be evidence-based in order that services can be better targeted and responsive to customers' needs.

The (experimental) data collected as part of this new legislation provides a greater depth of information on activities undertaken by local authorities to help or prevent homelessness and the outcomes of these activities. It is hoped that this information can be used to provide a greater understanding of homelessness by understanding the profile of the households that are approaching us for help. The following chart shows how a typical homeless (or threatened with homelessness) household is processed under the new legislation¹²:

¹² MHCLG, Page 3, *statutory homelessness statistical release*, England 2018/19, (March 2019).

Greater Norwich Homelessness Strategy 2020-2025



We are likely to see increases in the number of homeless households in Greater Norwich by around 4.5% from 2021 to 2026, according to an analysis using the Core Homelessness Model for the South of England in which Greater Norwich is situated for the purposes of this study. ¹³

The study looks at what measures could reduce the rise in core homelessness. The study considers a number of scenarios:

- Cessation of welfare reductions
- Increase in supply of new housing (including affordable, especially in the South of England)
- Extensive homelessness prevention activity by local authorities
- Regional convergence in economic growth by rebalancing growth in areas outside of London and the South East

¹³ Bramley, G, 2017, *Homelessness projections: Core homelessness in Great Britain, Summary report*, Heriot Watt University.

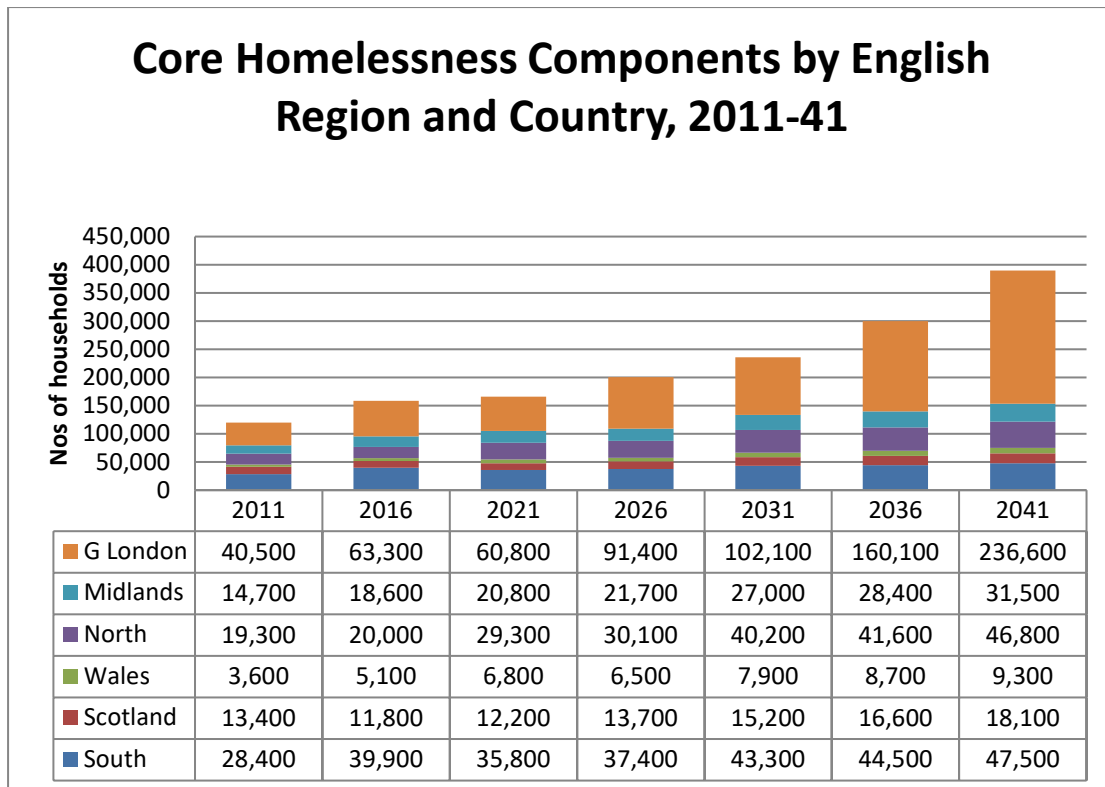
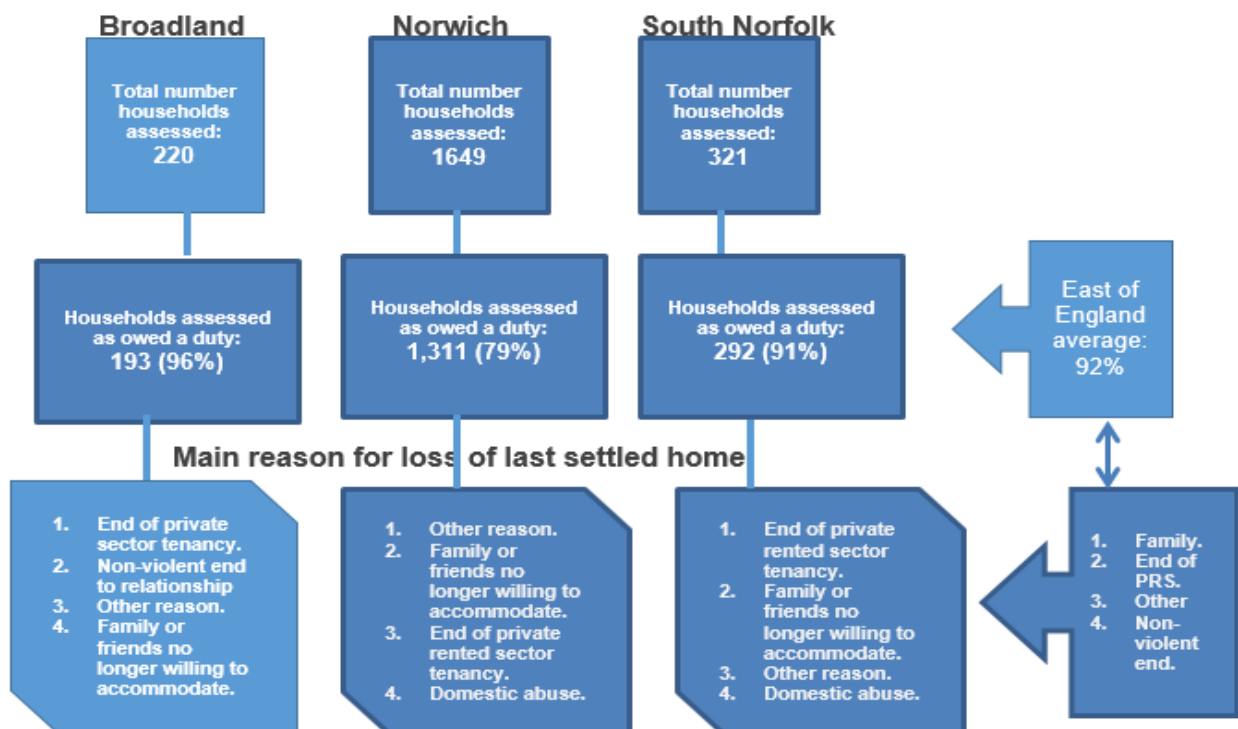


Table 7

3.22 Approaches to Housing Options Services for Assessment under the HRA 2017



The above diagram below shows the number of approaches to our Housing Options teams by households in 2018/19 by households stating that they are homeless or threatened with homelessness.

The statistics show that there were 2,190 households accessing the housing options teams in Greater Norwich, of these 82% were assessed as owed a duty. The main reason for loss of settled home in two of the three districts was end of a private sector tenancy. In Norwich, this reason was the third highest for a household losing their last settled home. It is likely that due to the experimental nature of the analysis, and the high number of 'others' recorded that this was the main reason for loss of last settled home in Norwich as well. The following statistics perhaps provide a clearer indication of the type of tenure households were in at the time of their application:



In common with the Eastern region, private rented is the tenure that most people are living in when approaching their housing options team for help with their housing situation. Living with family is in the top three most common tenures of the Eastern region and Greater Norwich areas, perhaps reflecting the younger cohort of people who face family eviction from their parents. No fixed abode is recorded in the top three of both Norwich and South Norfolk and is likely to include people in very temporary housing such as sofa surfing. In the East this is the fourth most common type of accommodation so it would suggest that both Norwich and South Norfolk are not that dissimilar.

Our approach in Greater Norwich is to try to prevent homelessness before it happens and ideally, persons at risk of homelessness will seek help before they become homeless and will work with every individual producing a Personalised Housing Plan (PHP). The following table shows the situation households find themselves in when they approach us for help.

	Broadland		Norwich		South Norfolk		East
	Nos	%	Nos	%	Nos	%	%
Households Prevented	102	53	876	66	166	57	56
Households Relief	91	47	435	34	126	43	44

Table 8

Both South Norfolk and Broadland councils are comparable to the East in the percentage of people who have their homelessness prevented. In Norwich, we reported a 10% higher figure (than the East) for households prevented from becoming homeless.

3.23 Household Type Seeking Help to Prevent or Relieve their Homelessness

The following information shows the household types that are seeking help with their housing. This information helps us understand the characteristics of the types of households who approach us so that we can put in place more effective interventions.

In Greater Norwich during 2018/19, the most common household type to seek preventative help were single households. This accounts for 66% of all prevention cases in Norwich, 54% in Broadland and 48% in South Norfolk. This household type (in the 2011 Census) accounted for 38%, 26% and 26% of all households in Norwich, Broadland and South Norfolk respectively. This number is even higher when we consider the number of single households who seek help with their homelessness when they are already homeless (relief) ; 83% of all relief cases in Norwich, 62% in Broadland and 61% in South Norfolk compared to 66% in the East. The majority of households who seek help when they are already homeless are single males although in South Norfolk and Broadland the gap is much smaller than Norwich.

Household type	Prevention/Relief			
	BDC	NCC	SNC	East
Single parent with dependents – Male	6/3%	1/1%	2/4%	3/3%
Single parent with dependents - Female	21/26%	19/9%	25/17%	30/20%
Single parent with dependents – Other/Gender not specified	0/0%	0/0%	0/0%	0/0%
Single adult - Male	25/33%	43/60%	31/45%	23/45%
Single adult - Female	29/29%	23/23%	17/16%	20/21%
Single adult – Other/gender not specified	0/0%	0/0%	0/0%	0/1%
Couple with dependent children	8/4%	8/1%	8/10%	13/5%
Couple/two adults without dependent children	10/4%	5/4%	13/7%	7/5%
Three or more adults with dependent children	1/0%	1/1%	2/0%	1/1%

Household type	Prevention/Relief			
	BDC	NCC	SNC	East
Three or more adults without dependent children	1/0%	0/0%	1/1%	1/0%
Not known	0%	0%	0%	0%

Table 9

3.24 Age Bands Owed a Prevention or Relief Duty

Age is clearly a determining factor in people becoming homeless of those households that were owed a Prevention or Relief duty often due to; low wages; lower welfare payments; or where young people are living at home with friends or extended family in often insecure living situations. The following table shows age groups (top 3) as a percentage owed this duty in 2018/19:

Area/Age band	East of England	Broadland	Norwich	South Norfolk
18-24	21%	25%	24%	20%
25-34	31%	30%	29%	27%
35-44	22%	26%	24%	20%

Table 10

Both Norwich and Broadland recorded higher numbers of 18-24 year olds than the Eastern region average.

3.25 Employment Status of Main Applicant Owed a Prevention or Relief Duty (compared to ONS Population Survey)¹⁴

Employment status	East	BDC	NCC	SNC
Registered unemployed	19.97%	8.8% (2.3%)	25.63% (4.1%)	11.99%
Not working due to long term illness/disability	19.63%	21.76% (n/a)	18.54% (26.4%)	31.16%
Full time work	16.09%	20.73%	17.70% (73.3%)	16.78%
Part time work	14.20%	25.91%	11.14%	11.64%
Not seeking work/at home	11.76%	10.36%	6.18%	13.01%
Not registered unemployed but seeking work	4.22%	2.07%	5.57%	1.71%
Retired	2.79%	2.07%	1.68%	6.16%
Student/Training	1.51%	0.00%	1.53%	2.74%
Other	4.71%	3.63%	7.48%	2.74%
Not known	5.12%	4.66%	4.58%	2.05%

Table 11

¹⁴ <https://www.nomisweb.co.uk/reports/lmp/la/1946157237/report.aspx?#ls> accessed on 05/02/2020

The employment status of someone who is homeless can have significant consequences for their ability to afford a home. In addition, it is imperative that when people approach us for help that they can continue to stay in employment whilst they receive help to resolve their homelessness. Both Broadland and South Norfolk record lower levels of people asking for help who are unemployed compared to the East. Norwich saw nearly 6% more people who were unemployed compared to the Eastern region average. Around 47% of people who came in to Broadland were in some form of employment compared to 29% and 30% in Norwich and South Norfolk (similar levels to the East). Both Broadland and South Norfolk recorded higher percentages of people who were not working due to long-term illness/disability. Whilst recorded levels of people not working due to a long-term illness are high as a percentage of the working age population (26.4%) in Norwich we saw similar levels to the Eastern region.

4. Development of the Strategy

This is the fourth Greater Norwich Homelessness Strategy that has been produced since 2007. Although led by a small working group comprising a partner lead and the three local housing authorities the process has been co-produced by representatives from the 30 or so different organisations that actively participate in and contribute to the Greater Norwich Homelessness Forum (GNHF).

The Strategy you see before you today has been created over an 18 month period and has been influenced by

- The results of the Greater Norwich Homelessness Review 2018/19 with partners in the GNHF
- Feedback from a series of stakeholder workshops held in 2019
- National and Local Policy

This Strategy will take a more holistic look at homelessness, considering the wider impacts that being without a home can have on an individual whilst recognising that these often come at a high cost – to the individual, the wider community and to the services which seek to minimise the effects of being homeless.

Ultimately it is our aim to reduce the chances of homelessness occurring in the first place and for this reason prevention is at the heart of this strategy. By using early help approaches we will prevent people from becoming homeless in the first place and where this is not possible we will strive to reduce the likelihood that individuals will suffer long term effects of being homeless.

5. Where do we want to be? Our Vision

“Greater Norwich is a place where agencies work together to support people who are, or may become homeless. By putting people at the heart of our service delivery we can create a wrap-around offer that helps people to take control of their own circumstances earlier, and stopping them from becoming homeless will be our main aim. This will provide people with a firm platform where their health and wellbeing, employment or training opportunities are either maintained or improved.”

We will look to achieve this vision by committing to the following four priorities:

1. Domestic Abuse
2. Preventing Homelessness
3. Single and Youth Homelessness
4. Financial Inclusion, Welfare Reform and Economic Growth

6. How will we get there?

6.1 Priority one: Develop and Deliver Flexible Housing and Support Solutions to Enable People to Safely Move on from Domestic Abuse

6.11 Local and National Picture

During the financial year 2018/19 in Greater Norwich 234 households said that the main reason for the loss of their last settled home was because of domestic abuse. It is likely that this number is higher due under reporting. The reported number of 234 can be split geographically as follows:

- Broadland – 15 households
- Norwich – 177 households
- South Norfolk – 42 households

Nearly one in ten households that approach our housing options teams in Greater Norwich will do so because they are fleeing domestic abuse of some kind, often because they lack the economic resources to secure alternative accommodation after leaving an abusive relationship. Domestic abuse can affect all groups including young single adults, couples and families with children.

Often the immediate need of a survivor fleeing domestic abuse is safety. Some survivors can stay safely in their home with adaptations to make the home safe. In other cases, people will need some form of transitional housing like a refuge or safe house to help bridge the gap before returning to independent housing. This time can be very unsettling for survivors and their families and the role of housing options teams is to ensure that the transition to safety and future housing options are available.

The national No Woman Turned Away¹⁵ project through Women's Aid provided specialist support to women who faced barriers in their search for a refuge place after fleeing domestic abuse. The barriers may have been due to specialist needs, such as mental health support, no recourse to public funds or supporting four or more children. Of the 309 women supported through the duration of the project, while waiting to access a refuge space; 136 women sofa surfed with relatives, friends and even strangers; 22 women slept rough; 5 women slept rough with their children and 1 woman slept rough while pregnant. Additionally, 59 women experienced further abuse from the perpetrator and 30 women either remained or returned to the perpetrator. It should be noted that this report relates to a small cohort of women, however it highlights the vital importance of an appropriate and safe space to stay when fleeing domestic abuse.

Although there is always, opportunity to improve the offer and co-ordination of support available to those who have experienced Domestic Abuse it is important that we continue to contribute to the current systems. Crucial to this is the MARAC (Multi agency risk assessment conference) and the associated DASH assessment. Through this co-ordinated approach, partners consider the risk and required assistance on a daily basis making sure that there is no delay or gaps in provision provided to those experiencing DA. The DASH report also provides a tool to all professionals to make sure the correct questions are used whilst also ensuring consistency throughout the County.

Through our homelessness review consultation events to help inform this strategy the following issues were raised (in no order of importance):

- Welfare benefit issues with people with no recourse to public funds in refuges making it difficult for them to stay.
- Affordability issues for people accessing refuges who are working as rents are relatively high.
- Alternative affordable accommodation options for people who do not want to access a refuge.

6.12 Actions to Support households Experiencing Domestic Abuse

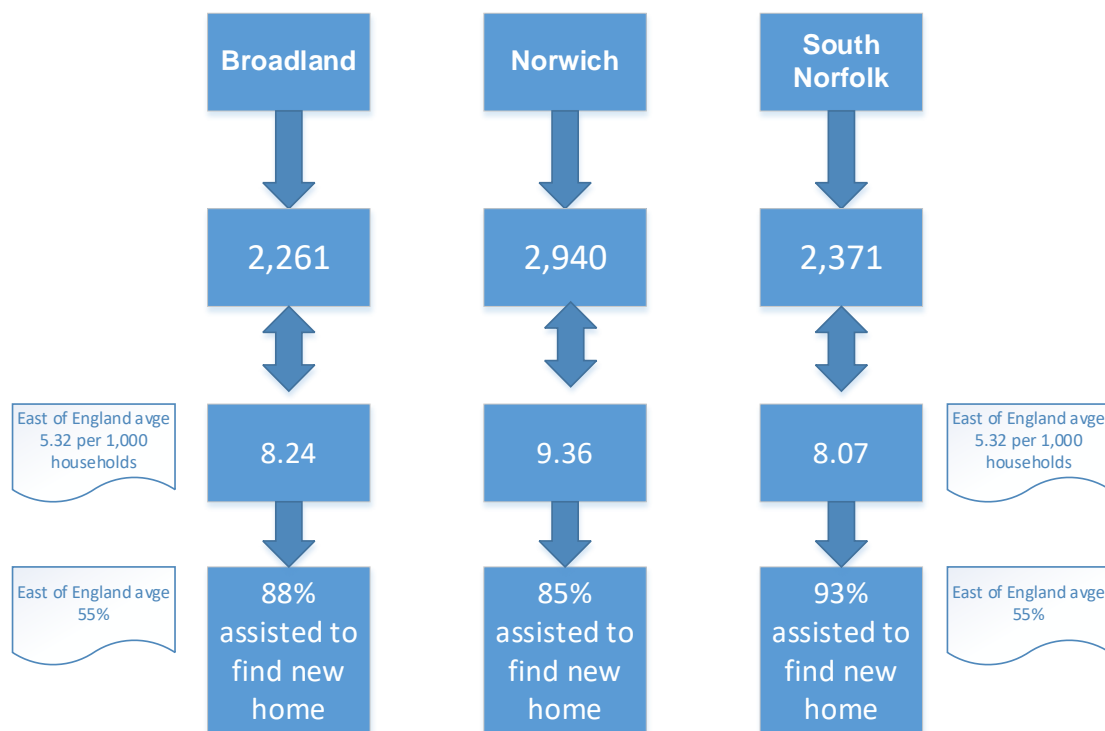
1. Develop and deliver flexible housing approaches to meet the needs of people fleeing domestic abuse, including male victims, people who identify as LGBTQI+ and those with more complex needs, across all tenures that are not currently being met by joint working with voluntary and statutory sector agencies.
2. Provide a consistent Greater Norwich response across our Help/Community Hubs through our funded domestic abuse services and ensuring that resource capacity is sufficient to meet expected demand.

¹⁵ <https://www.womensaid.org.uk/no-woman-turned-away/>

3. Work with DA Services and the Mancroft Advice Project/Youth Advisory Boards to develop a Freedom/Power to Change course for young people.
4. Supporting the outcomes of the proposed Domestic Abuse Bill including the potential for new statutory duties for Tier 1 and Tier 2 authorities to convene DA Partnership Boards for commissioning of 'domestic abuse safe accommodation.'
5. Ensuring specific provision to overcome challenges for those living in a rural area (Particularly relevant for Broadland and South Norfolk District areas).

6.2 Priority Two: Preventing Homelessness

All three local district housing authorities in Greater Norwich has a strong record in preventing and relieving homelessness, the data (from 2013/14 to 2017/18) below shows the number of households that were helped by our housing options teams.¹⁶ The data also shows a comparative analysis of our homelessness prevention and relief statistics with the rest of the East of England average (per 1,000 households).



¹⁶ This data recording system no longer exists, being superseded by the HRA Act 2017 statistical recording requirements.

6.21 Discretionary Housing Payments

All local housing authorities (LHAs) can access Discretionary Housing Payments (DHP). The scheme allows LHAs to make financial awards to people experiencing financial difficulty with housing costs who qualify for housing benefit or universal credit housing costs. The Government has provided DHP since the introduction of welfare reforms in 2011. Specifically the fund is to help those affected by the following changes:

- Benefit cap
- Removal of the Spare Room Subsidy (Bedroom Tax)
- Local Housing Allowance shortfalls
- Households in financial difficulty

In total during 2018/19 in Greater Norwich £773,934 was awarded (Broadland £128,973, Norwich £469,892 and South Norfolk £174,897) for these purposes and can be broken down as follows (rounded up):

LHA	Benefit Cap	Bedroom Tax	Local Housing Allowance Shortfall	Core Housing Costs
Broadland	21%	44%	22%	13%
Norwich	21%	61%	9%	10%
South Norfolk	28%	41%	18%	12%

Table 12

Figures would suggest that across greater Norwich the households at greatest risk of homelessness have been subject to the removal of the spare room subsidy (bedroom tax). The difficulty for people living in properties that are larger than their requirements is the lack of smaller accommodation being available. The second highest is the benefit cap and this is more likely to affect families with children. Research has found that nationally lone parents head three-quarters of affected households.¹⁷

As the above evidence shows these households affected by welfare reform are more at risk of becoming homeless. The funding allocation for 2019/20 has reduced by 15% compared to 2018/19. This reduction potentially could affect the numbers of households we can help who are struggling to keep a roof over their heads.

6.22 How We Approach Prevention in Greater Norwich

Broadland and South Norfolk

South Norfolk and Broadland, through their one team approach, have created a model whereby prevention is key in managing resource pull, allowing ever more focus on preventing people from facing the incredibly stressful situation where they do not have the security of a home for themselves and their

¹⁷ Page XXIII – 1, CRISIS, *The homelessness monitor: England, 2019*.

family. We have taken the proactive decision to bring our Housing and Benefit teams together under one management team providing a seamless service to residents. Included within this team are; Housing Solutions Officers, where proactive and outcome focussed decisions are expected; Support Advisers who provide floating support and training, specially trained visiting Benefit Staff who can quickly ascertain housing concerns and full utilisation of our Discretionary Housing Payment fund to make sure we achieve our aim in providing sustainable accommodation to all those who need it

The Housing and Benefit teams are also located within our Help Hub which comprises over 30 partner agencies that deliver 52 different specialisms that all aid in preventing homelessness. Included within are Debt and Welfare advice, Domestic Abuse Advisers, Social Services, and the Police in addition to links with the Norwich City Pathways service and Mental Health support for those at risk of homelessness. This provides easily accessible holistic advice and support to people. The Community Connectors provide a Help Hub presence in our communities, delivering a Social Prescribing programme. Connectors are trained in recognising potential housing issues. This early identification is key for residents to obtain early access to a package of services that meets their needs.

Norwich

Since 2007, NCC has used a prevention-based approach to dealing with homelessness. In the intervening period, this has led to the council being awarded 'Regional Champions', 'Trailblazer' and 'Gold Standard' status to recognise the success of our commitment and approach to the prevention of homelessness.

We are committed to providing an accessible service, with duty Homelessness Prevention Advisers available daily on a drop-in basis, providing expert advice to clients in housing need. Through all other channels, Housing Options Officers deal with all of the department's contact, ensuring specialist advice at the first point of contact for all.

Our focus on specialism in housing advice and support extends to the provision of specialist co-ordinators in the areas of domestic abuse, rough sleeping and the private rented sector.

We provide a range of options to our clients and projects which originated in our housing options service including 'LetNCC', which provides 300 units of privately leased accommodation to clients in housing need and 'The Feed', a social enterprise which helps help people who have experienced homelessness, helping people access long term housing, training and employment.

6.23 Actions: What we will do to Prevent Homelessness

1. Continue to monitor the progress of the following protocols including:
 - Greater Norwich & Breckland Criminal Justice Homelessness Prevention Protocol
 - Joint Protocol to Address the Needs of Homeless Young People in Norfolk
 - Proposed Norfolk Mental Health Hospital Discharge and Homelessness Prevention Protocol
2. Undertake quarterly analysis of H-CLIC data to deliver service improvements, monitor levels of homelessness and report this to the Greater Norwich homelessness forum and members.
3. Increase the number of households at risk of homelessness staying in their own homes following contact with our housing options services.
4. Seek to identify funding to deliver upstream homelessness prevention in places of education including wider family networks.
5. Taking a person centred approach - work with our partners in the voluntary and statutory sector to ensure that we use our combined resources effectively to prevent homelessness (for example commissioning of services).
6. Identify gaps and celebrate success in homelessness prevention with members of the Greater Norwich Homelessness Forum to inform and improve service delivery across the statutory and voluntary sector.
7. Identify shared training opportunities with Greater Norwich Housing Options teams and other agencies.

6.3 Priority Three: Single and Youth Homelessness

6.31 Local Picture

What we mean by single homelessness people in the context of this priority is predominantly people in the 16-35 year old age group. Unfortunately, too many people in this group are threatened with, or become homeless in Greater Norwich; this is both a local and a national problem.^{18 19} Through our homelessness review we found that as a whole 55, 53 or 47% (BDC, NCC and SNC) of presentations in 2018/19 were from people in the 16 to 35 year old age group. As previously mentioned both Norwich and Broadland saw slightly higher levels of presentations from this group compared to the Eastern average of 52%; South Norfolk saw slightly lower levels. As a proportion of the population this age group is disproportionately affected by homelessness

¹⁸ 16 to 25 year olds

¹⁹ 26 to 35 year olds

than older people making up 19% (in BDC and SNC) and 36% (NCC) of our total populations.²⁰

Recorded numbers of 16/17 year olds approaching the Greater Norwich Councils are very low with only 5 individuals approaching for help during 2018/19.

Nationally over the last decade there has been an increase of nearly 700,000 of 20 – 34 year olds living with their parents (this is a 28% increase). The number of households headed by younger people has also fallen in the last decade; rates are 32% lower in London and the South East.²¹ This is reflected locally in the number of people who become homeless following family or parental eviction. All three local authorities in Greater Norwich recorded this accommodation situation (living with family) when they approached us for help as one of the top three reasons for their homelessness. Locally, specialist young person services like Mancroft Advice Project have seen an increase of 23% from 2016 to 2018 in the number of young people accessing their young person housing advice service over the past three years.²² The main reasons for seeking advice were:

- Housing options
- Obtaining hostel accommodation
- Applying as homeless

6.32 Engagement with Young People and External Partners

As part of preparation for this strategy, we consulted statutory, voluntary sector partners and young people to ask them what they thought the priorities were for young people. These are a selection of what they thought at a Greater Norwich Homelessness Forum in December 2018 and January 2019:

Issue	Comments
Care leavers and transitioning to adulthood	<p>Improve variety of options to meet different needs</p> <p>Maintain Joint Protocol to Address the Needs of Homeless Young People in Norfolk</p> <p>Use Personalised Housing Plans (PHPs), include goals and a “plan b” with other options e.g. crisis/respite even when in current accommodation.</p>
Preventative work	<p>18 plus young people should need support (include housing advice and budgeting) and this should be default offer.</p>

²⁰ <https://www.norfolkinsight.org.uk/population/report/view/b15822d80ec54439bb12134b7c857bb9/E07000149>
 Accessed on 12/02/2020.

²¹ Page XIV, The CRISIS, *The homelessness monitor: England, 2019*.

²² Mancroft Advice Project saw 375,421 and 463 young people in the years 2016, 17 and 18.

Issue	Comments
	Proactive work with schools should be considered and other agencies.
Partnership working	Better connection between districts and Children Services needed 21-25 year olds not engaging with Children Services or Adult Social Care. Should be better signposting for support.

Table 14

We also spoke to young people who had experienced homelessness and members of the Youth Advisory Board around what their views were around homelessness. We used the St Basils Positive Pathway Framework model to develop their thoughts and suggestions. A sample of their responses are as follows.²³

Subject	Comments
1. Intervention at earliest opportunity to stop youth homelessness	Mandatory education in school that demonstrates key home management and tenancy skills. This should include finance management, taxes and welfare support, where to go for housing support and what to do in housing emergencies. Support services should be easily accessible. Address perceived stigma of social or supported housing.
2. Safeguard young people	More supported housing for young people with less requirements. Independent support workers offered to help young people find and maintain a home. Local support groups in schools or community areas for people struggling with housing issues or homelessness. Specialist support for LGBTQI+ youth. This should include mediation for families.
3. Improve transition for young people to independence	More housing available to young people on benefits and low incomes in areas close to amenities and are inexpensive to run and live in such as Passiv-haus.
4. Develop specialist housing services and intervention	Independent support workers offered to young people to support finding and maintaining a home.

Table 15

²³ The full response from the Youth Advisory Board members will be included in the Greater Norwich homelessness review document and will be published alongside the final strategy.

6.33 Actions: What we will do about Single and Youth Homelessness

1. Consider and explore options for additional support to help single young people find and maintain a home.
2. Enable the provision of affordable single person homes.
3. Explore funding streams to provide mediation for young people and families before crisis wherever possible.
4. Seek to achieve a commitment from all housing providers to identify, promote and further develop specific models of housing supply that helps young adults gain independence.

6.4 Priority four: Financial Inclusion, Welfare Reform and Economic Growth.

The increase in the cost of housing is one of a number of areas that have had a sustained impact on the cost of living (explored in more detail below). In addition, the range of sustained austerity measures implemented since 2010 and the increase of necessary expenditure is putting unsustainable pressure on people and families finances.

Those on low incomes are less likely to have access to the best offers and interest rates for bank accounts and credit borrowing. They are also more likely to be paying more for their utilities and insurance products.²⁴ For those living in rural areas, this gap can be more pronounced as public transport options are limited and, where the household has access to a car, this could be through high interest credit or could be for a much older car which will have an increased likelihood of higher tax and maintenance costs. Similarly, choice can be reduced even in the simple terms of how groceries are purchased and access to the internet. Either because it is too expensive or there is a lack of suitable options in the area in which they live.

To add, the implementation of self-serve technology is becoming more widely spread. With sustained pressure on public sector finances, organisations may turn to technology to streamline how services are accessed and to provide efficiencies. UC being the best-known example of this. Self-serve can be a positive step as it allows people to access a more flexible service at the time that suits them. However, this needs to be provided as a suite of options to meet the accessibility requirements of our residents, for example, those without internet access and those with additional support or complex needs.

Welfare reform, often prompted by Universal Credit has caused hardship within the sub-region.²⁵ The principles of Universal Credit are sound in that they aim to allow people to be prepared to move into work, gain greater budgeting capacity and react quickly to changes in income thus avoiding overpayments and debt. Where there have however, been continued issues,

²⁴ Select Committee on Financial Inclusion 2017

²⁵ The Trussell Trust 2019

is through its implementation and where it has been used to create savings throughout the period of austerity the country has faced.

Linked to this is the use of zero hours contracts and the gig economy, employment types which have grown exponentially within the last 6 years and with those who work in this sector more likely to claim UC as an in-work benefit. There are some advantages to this type of work for some people, in that they provide flexibility to workers who do not want to commit to contracted hours. However, uncertain hours, low pay and concerns over the administration of UC makes it difficult to budget too far ahead and decreases resilience where individuals may seek other, more sustainable, training and employment opportunities.

In terms of the cost of housing in relation to income, the latest figures show that in recent years rents in England and Wales have grown 60% quicker than wages.²⁶ Those who previously would have purchased are finding the prospect much more difficult.

Additionally, this is represented through the Local Housing Allowance gap between what is actually available to those claiming Housing Benefit or the Housing element of Universal Credit and rental charges within the region. A recent published report²⁷ found that nationally only 5.6% of homes that are advertised fall within or below what is available within the benefit system. To add to this many Landlords are refusing access to their properties to those claiming benefits.

The ongoing increase in the pull on people's finances can make the prospect of purchasing or even privately renting a property unachievable meaning that options for the simple provision of a home are significantly reduced.

6.41 Poverty and Homelessness

"There is also now extensive international evidence on the interrelationship between poverty and domestic violence,²⁸ which in turn is a key trigger for homelessness amongst women and children.²⁹ Thus people facing poverty may find their social as well as material capital depleted, while also being more likely to experience personal circumstances that lay them open to homelessness, again reinforcing the potential interconnectedness between structural and more personal or interpersonal causes of homelessness."³⁰

We also know that family and other 'anchor' social relationships – argued to be an especially important 'buffer' to homelessness³¹ – can be put under

²⁶ ([Shelter 2018](#)).

²⁷ [McClenaghan et al, 2019](#)

²⁸ Fahmy *et al.*, 2016

²⁹ Hutchinson *et al.*, 2015

³⁰ Bramley & Fitzpatrick, *Homelessness in the UK: who is most at risk?*, Housing studies, 2018

³¹ (Johnson et al., 2015; Lemos, 2000; Tabner, 2010)

considerable strain by the stressors associated with poverty in the household.³²

Research by Crisis³³ has found, based on extensive research that the drivers of homelessness in its different forms are:

- Poverty
- Availability of housing that is affordable and accessible
- Extent that local authorities employ the full range of prevention measures
- Use of unsuitable forms of temporary accommodation
- Demographics of people including age and household composition (single people and lone parents) and persons with complex needs

6.42 Destitution^{34,35}

A report by the Joseph Rowntree Foundation (JRF) published in 2017 updated an earlier study in 2015 providing an overview of the level of destitution in the UK and the main drivers for its existence. Destitution was measured using face to face interviews and a review of quantitative data provided district level national-level estimates. People found destitute were more likely to be:

- Migrant groups
- Single men under 35
- Living in rented accommodation or are living in temporary or shared living arrangements
- Sleeping rough

The study found that there were a number of reasons for why people fell into destitution including:

- Multiple debts
- Benefit gaps, delays, sanctions and freezes
- Disability and ill health
- Housing benefit not covering rental costs
- Low paid work with erratic hours worked
- Relationship breakdown (including domestic abuse) combined with debt and housing difficulties

³² Ibid. Johnsen & Watts, 2014; Pinderhughes et al., 2007

³³ Bramley, G, 2017, *Homelessness projections: Core homelessness in Great Britain, Summary report*, Heriot Watt University

³⁴ People are destitute if:

a) They have lacked two or more of these six essentials over the past month, because they cannot afford them:

- ☐ shelter (have slept rough for one or more nights)
- ☐ food (have had fewer than two meals a day for two or more days)
- ☐ heating their home (have been unable to do this for five or more days)
- ☐ lighting their home (have been unable to do this for five or more days)
- ☐ clothing and footwear (appropriate for weather)
- ☐ Basic toiletries (soap, shampoo, toothpaste, toothbrush).

³⁵ Fitzpatrick, S & Bramley, G et al, *Destitution in the UK 2018*, JRF, 2018.

Norwich (and Oxford) was found to be in the top decile on overall estimated destitution in the UK amongst predominantly former industrial centred local authorities and inner London Boroughs. The table below compares Norwich to the other greater Norwich local authorities (10=high to 1=low).

Area	Migrant	Complex Needs	UK other	All destitute
Norwich	8	10	8	10
South Norfolk	3	5	1	2
Broadland	1	5	2	2

Table 16

6.43 Economic Growth

The built-up Norwich urban area extends beyond the Norwich City Council boundary, with extensive suburban areas on the western, northern and eastern sides. The population of the urban area is estimated to be 220,000; around 28 per cent of the urban population lives in Broadland and a further 7 per cent lives in South Norfolk.

The city centre of Norwich is a catalyst for economic growth across Greater Norwich, encouraging investment into the area. However an ongoing trend has been a movement of jobs away from the Norwich local authority area to the urban fringe. Much of this has been brought about by the provision of high-quality office space in out-of-town business parks in the adjoining local authorities. In addition, market towns at Diss, Harleston and Aylsham and other local employment sites provide accessible employment for rural areas.³⁶

³⁷

One of the key roles Councils play in the sustained delivery of economic opportunities is by attracting the right business for our demographic, future proofing our economy to make sure that there are suitable opportunities to our residents. Where opportunities to diversify present themselves, It is vital that we co-ordinate, alongside the DWP and partners, for example, the New Anglia Local Enterprise Partnership (LEP); and the Greater Norwich Growth Board (GNGB) in addition to training providers to make sure that our residents are well placed to meet the demands of businesses located in our districts, ensuring our area remains attractive to investment.

Our role as local planning and housing authorities closely compliments economic growth delivery, in addition to making sure those who need extra support have access to it.

³⁶ Norwich Economic Strategy 2019-2024

³⁷ <https://www.gnlp.org.uk/assets/Uploads/Reg-18-Final-Strategy-Document-0702.pdf>

6.44 Actions

It is essential that the role of the Greater Norwich Councils is to co-ordinate and prioritise economic sustainability and growth to provide access to opportunities for our residents.

1. Supporting the Inclusive Growth agenda at a County and Local Authority level – Improving access to skills, training and employment opportunities
2. Building the right properties - Learning from the great achievements made within each Council over the last 5 years and to continue to produce sustained delivery of affordable housing and social energy efficient properties with sustainable tenures.
3. Economic Delivery – Support and enable the delivery of the ambitions of the Economic Strategies and the Greater Norwich Local Plan across the local authority areas,
4. Explore and develop our offer to increase accessibility and availability – ensuring we can enable residents and customers to access services at the right time and location for them

7. Monitoring of the strategy

To ensure we are taking a proactive approach to preventing and reducing homelessness, we will review this homelessness strategy annually with our partners through the Greater Norwich Homelessness Forum (GNHF) and its thematic sub-groups.

The 2021 review will take place as part of the work into the next iteration of the Rough Sleeper Strategy 2022-2025.

The GNHF will also provide annual review and challenge points to measure that we are achieving the actions set out in this strategy and help us to identify where they may need to be amended, for example to meet a priority not currently identified or where there are changes in legislation.

8. Glossary of Terms

Term	Definition
Bedroom Tax	Formally known as the 'Spare Room Subsidy'. Housing Benefit or Universal Credit Housing element is reduced if classed as having one or more spare bedrooms in a council or socially rented property. The maximum rent that can be covered is reduced by: 14% for 1 spare bedroom 25% for 2 or more spare bedrooms
Benefit Cap	Limit on the total amount of certain benefits you can get if you are working age. The benefit cap affects those households getting Housing Benefit or Universal Credit. If the cap affects the household; Housing Benefit or Universal Credit is reduced.
Broad Rental Market Area (BRMA)	The BRMA is an area defined by the Valuation Office Agency and is an area of residential accommodation within which a person could move and still have access to similar services of a similar standard. Each BRMA has its own set of LHA rates. Your postcode defines which BRMA in which you live.
Choice Based Lettings (CBL)	Choice based lettings gives a household the chance to apply for empty council and housing association properties that the council or housing association advertises (Currently Norwich and South Norfolk Council's operate this system).
Clinical Commissioning Group	Clinical Commissioning Groups are responsible for implementing the commissioning roles as set out in the Health and Social Care Act 2012. From April 2020, the 5 Norfolk and Waveney CCGs will merge and become Norfolk and Waveney Clinical Commissioning Group with one Governing Body and Leadership Team.
Commuted Sums	The main objective of a local authority should be to deliver the affordable homes on-site as part of a new development. However, on some developments this may not be possible and there may be sound planning or housing reasons where off site delivery can be justified and it may be acceptable to take an off-site commuted sum of broadly equivalent value in lieu of part or all of the affordable housing provision on a site. The developer must pay the Council money to enable the equivalent affordable housing to be built or provided on another site. This payment is called a commuted sum and it is agreed and secured via a planning obligation under Section 106 of the Town and Country Planning Act 1990. This is the legal mechanism which makes a development proposal acceptable in planning terms that would not otherwise be acceptable
Consumer Price Index (CPI)	A measure of changes in the purchasing-power of a currency and the rate of inflation. The consumer price index expresses the current prices of a basket of goods and services in terms of the prices during the same period in a previous year, to show effect of inflation on

Greater Norwich Homelessness Strategy 2020-2025

Term	Definition
	purchasing power.
DASH (Domestic abuse, stalking and harassment and honour based violence risk identification, assessment and management model)	Common checklist for identifying and assessing risk for use by practitioners.
Discretionary Housing Payments (DHP)	Local housing authorities have the ability to authorise DHP to those who may require some financial assistance in order to meet their housing costs.
Duty to Refer	A formal duty placed on public bodies under the Homelessness Reduction Act 2017 to refer individuals or are homeless or threatened with homelessness into a local authority of the individuals choosing. Public bodies are; prisons (public and contracted out); youth offender institutions and youth offending teams; secure training centres (public and contracted out) and colleges; probation services (community rehabilitation companies and national probation service); jobcentre plus; accident and emergency; services provided in a hospital; urgent treatment centres; and hospitals in their capacity of providing in-patient treatment; social service authorities.
Early Help and Family Support	Giving the right help to children and their families at the earliest opportunity. For those who need more help than their usual support network but do not meet the criteria for formal intervention within Children's Services
First Step	The Rough Sleeping Service available in South Norfolk and Broadland. Provision of short-term accommodation and support provided by Rough Sleeping Coordinators
Greater Norwich Homelessness Forum	Quarterly forum held by Norwich City and Broadland & South Norfolk Councils. Representatives attend from statutory, commissioned and VCSE organisations. The forum will be the mechanism through which the strategy is monitored.
Greater Norwich Local Plan 2018-2038 (GNLP)	The Greater Norwich Local Plan (GNLP) is being produced by Broadland District Council, Norwich City Council and South Norfolk Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP). It includes policies which will be used to determine planning applications in the Greater Norwich area and will identify sites for new homes, jobs, community facilities and infrastructure
Health and Wellbeing Boards	Statutory bodies introduced in England under the Health and Social Care Act 2012. According to the Act, each upper-tier local authority in England is required to form a health and wellbeing board as a committee of that authority.
Help Hubs	Areas within local authorities for co-location of local authority and other services, for example; Housing, Children's Services, Community Safety, Domestic Abuse

Greater Norwich Homelessness Strategy 2020-2025

Term	Definition
	services, Social Prescribing. Each local authority has a Help Hub but they will differ in operation and some of the services offered.
Homelessness Reduction Act 2017	Places additional duties on local authorities; provide advice and guidance for all households approaching the LA and to meet the needs of certain listed groups including those leaving prison, hospital or care and those with mental health issues ; to prevent those threatened with homelessness from becoming homeless; to relieve homelessness for those who are homeless. Both prevention and relief duties last for 56 days but can be ended in several ways in that time
House of Multiple Occupation (HMO)	A HMO is a building, or part of a building that is occupied by persons who do not form a single household - in other words, are not family members. From 1 st October 2018 all HMOs that are let to 5 or more unrelated tenants who form more than one household and who share toilet, bathroom or kitchen facilities require a licence from the local authority
Joint Strategic Needs Assessment (JSNA)	The means by which CCGs and local authorities describe the future health, care and wellbeing needs of the local populations and to identify the strategic direction of service delivery to meet those needs.
Let NCC	Norwich City Council's private sector leasing scheme.
Local Housing Allowance (LHA)	Local housing allowance is housing benefit that helps pay the rent if you rent from a private landlord.
Looked After Children (LAC)	Looked After - a provision made under the Children's Act 1989 in England and Wales, whereby a local authority / Health and Social Care Trust has obligations to provide for, or share, the care of a child or young person under 16 years of age where parent(s) or guardian(s) for whatever reason are prevented from providing them with a suitable accommodation or care. A child is 'looked after' if he or she is provided with accommodation.
Multi-agency risk assessment conference (MARAC)	A MARAC is a risk management meeting where professionals share information on high risk cases of domestic violence and abuse and put in place a risk management plan.
Not in Employment, Education or Training (NEET)	A young person who is no longer in the education system and who is not working or being trained for work.
No Fixed Abode (NFA)	A person having no permanent residence.
Pathways	Rough Sleeping Service in the Norwich City and Broadland areas. Consists of 8 partner agencies, provision of accommodation and support.
Severe Weather Emergency Protocol (SWEP)	People sleeping rough in Greater Norwich can access emergency accommodation and support during periods of exceptionally cold weather through the SWEP.
Sofa surfing	Staying temporarily with various friends and relatives while attempting to find permanent accommodation.

Greater Norwich Homelessness Strategy 2020-2025

Term	Definition
Strategic Housing Market Assessment (SHMA)	The Strategic Housing Market Assessment (SHMA) was updated in June 2017. Its purpose is to set out the <u>Objectively Assessed Need (OAN)</u> for housing in the local planning areas of Broadland, Breckland, North Norfolk, Norwich and South Norfolk together with the Broads Authority, including affordable housing, and will be used by the commissioning authorities as a shared evidence base to inform the preparation of Local Plans.
Supported Lodgings	Supported Lodgings is an accommodation scheme for vulnerable young people aged 16-24 across Norfolk. Supported Lodgings provides young people who find themselves with nowhere to live and little to no support network, with a safe, supportive place to stay in the homes of local people.
Universal Credit	A benefit for those who are not working or on a low income. It is replacing six other benefits; Housing Benefit, Income Support, Income Based Jobseekers Allowance, Income Based Employment and Support Allowance, Child Tax Credits and Working Tax Credits and is paid monthly.

SOUTH NORFOLK AND BROADLAND ROUGH SLEEPER STATEMENT 2020 - 2022

1. INTRODUCTION

This document articulates the South Norfolk and Broadland Councils joint objectives for tackling rough sleeping across our two districts. The statement is complimentary to the Greater Norwich Homelessness Strategy 2020 to 2025 which is currently under development and will be adopted by the three Greater Norwich Councils in 2020. This Rough Sleeper Statement is a short term document that will last through to 2022 when the joint ambition is for the creation of a Greater Norwich Rough Sleeper Strategy.

COVID-19

The Coronavirus outbreak and the implementation of nationwide lockdown requirements saw a significant increase in the number of people who are rough sleeping or at risk of rough sleeping supported and accommodated by South Norfolk and Broadland. The predominant source of this increase stemmed from those who had transient arrangements for their accommodation, otherwise known as hidden homelessness. This has provided evidence that although rough sleeping remains low within both districts there is a steady level of people who have very little control over their accommodation and remain on the cusp of rough sleeping.

Statistically people who are rough sleeping have an increased incidence of substance and alcohol misuse, domestic abuse and pre-existing health, including mental health conditions that could impact on ability to recover from a Covid-19 infection and in addition to being less likely to have access to means to self-isolate effectively.

To this end, early in the lockdown period Dame Louise Casey wrote to all Local Authorities across England requesting that anyone who was street homeless or currently living in dormitory style emergency housing was to be accommodated within 24 hours, to minimise the risk of them contracting Covid-19, known as 'Everybody In'. South Norfolk and Broadland Councils are proud to say that they were able to offer accommodation to all those rough sleeping across the local authority areas.

We continue to find that those who have approached us fall within the medium to high risk categories making sourcing accommodation very difficult however in all cases we have succeeded. We continue to work with our supported accommodation providers to encourage move on and utilise subsequent voids. Long term however the whole sector is seeing this as an opportunity to end rough sleeping within the County. We are therefore working very closely and are an intrinsic link in making sure that the services people need to avoid rough sleeping, including floating support, increased co-ordination within health and substance misuse and incorporating a Housing First model. This model will be delivered within the timeframe of this statement

The impacts of Covid-19 are expected to be long lasting and both this Rough Sleeper Statement and the Greater Norwich Homelessness Strategy 2020-2025 builds on the solid foundations of practice developed both before and during the pandemic.

2. CONTEXT

The context to this statement is articulated through a range of legislative and best practice documents. These include -

Homelessness Reduction Act 2017 (HRA)

The HRA placed new duties on local authorities that are designed to ensure all households at risk of homelessness receive earlier and more effective interventions. Those new duties include **Prevent** to stop homelessness happening, and **Relieve** to find suitable alternative accommodation in a timely manner and before the main homelessness duty is taken.

Making Every Adult Matter (MEAM)

The MEAM approach helps local areas design and deliver better co-ordinated services for people experiencing multiple disadvantage. It's currently being used by partnerships of statutory and voluntary agencies in 27 local areas including the Greater Norwich area as part of the Pathways Partnership.

Rough Sleeper Strategy 2018 - 2022

The Ministry of Housing, Communities and Local Government Rough Sleeper Strategy sets out central governments plans to halve rough sleeping by 2022 and end it by 2027. It includes a range of commitments, intended both to help those who are sleeping on our streets or currently at risk of doing so, and to lay foundations for a system focused on prevention, early intervention and a rapid re-housing approach to recovery. The Strategy has been accompanied by a number of bidding rounds to secure funding for new and innovative interventions to reduce rough sleeping and to enable the rapid re-housing of those who have been homeless. In 2019 the two Councils successfully secured significant funding to develop the First Step service and a continuation funding bid for 2020/21 was also successful.

The Welfare Reform Act 2012

This legislation led to the most significant change to the welfare system in decades and the creation of Universal Credit. UC is a single payment that encompasses up to what was previously six different benefits. Over the same timescale Local Housing Allowance has remained unchanged and no longer reflects the cost of housing locally. Broadland and South Norfolk Council areas are in the process of rolling out UC and although demand on housing services has unquestionably increased, the full impact of these changes are as yet unknown.

3. STRATEGIC OBJECTIVES

Objective 1. Early Intervention and Prevention of Homelessness

To achieve this the two Councils will:

- Work in partnerships with statutory and voluntary sector colleagues to develop a collaborative and innovative housing offer to prevent homelessness.
- Further develop, and make permanent, the Broadland and South Norfolk First Steps Rough Sleeper Service.
- Continue to work with, and support, those accommodated during the Covid-19 lockdown period to secure sustainable accommodation solutions.

Objective 2. Improve the range of temporary accommodation options across the two Councils

To achieve this the two Councils will:

- Through the First Steps model increase our outreach and upstream approach providing tailored support where and when needed
- Work to prevent the need for Temporary Accommodation through sustainable accommodation options.
- Design and implement a Best in Class Temporary Accommodation pathway

Objective 3. Reduce the Incidence of Rough Sleeping

To achieve this the two Councils will:

- Implement a Housing First approach to sustainable accommodation for those who are rough sleeping or at risk of rough sleeping.
- Work with partners to ensure those rough sleeping can access the appropriate accommodation, support and advice to prevent re-occurrence
- Utilise rough sleeper funding and cold weather funding to ensure we run a no second night out approach throughout the year

4. MONITORING PROGRESS

Measures to monitor delivery against this joint Rough Sleeper Statement have been developed and will be reported as part of the two Councils performance management framework. The measures developed thus far include

- Rough Sleeper Count data
- Total number of homelessness decisions
- Number of placements in temporary Accommodation by type
- Average length of stay by type (bed & breakfast and self-contained)

This statement will be reviewed annually.

Equalities and Communities Impact Assessment

Name of Officer/s completing assessment:

Victoria Parsons BDC/SNC
Chris Hancock NCC

Date of Assessment:

Assessment 1 13 07 2020

1. What is the proposed Policy (please provide sufficient detail)?

For the purposes of the assessment the term 'Policy' relates to any new or revised policies, practices or procedures under consideration.

The Greater Norwich Homelessness Strategy 2020-2025 (GNHS)
The South Norfolk and Broadland Rough Sleeper Statement 2020-2022 (RSS)

Greater Norwich is a place where agencies work together to support people who are, or may become homeless. By putting people at the heart of our service delivery we can create a wrap-around offer that helps people to take control of their own circumstances earlier, and stopping them from becoming homeless or returning to homelessness will be our main aim. This will provide people with a firm platform where their health and wellbeing, employment or training opportunities are either maintained or improved.

Covid-19

Much of the data used for the purposes this EqCIA dates to a period prior to the pandemic outbreak. Data is emerging on the impact with initial analysis showing that we are about to enter into a period of sustained recession. The Organisation for Economic Co-operation and Development (OECD) in June 2020 stated that the recovery, after an initial, rapid resumption of activity, will take a long time to bring output back to pre-pandemic levels, and the crisis will leave long-lasting scars - a fall in living standards, high unemployment and weak investment. Job losses in the most affected sectors, such as tourism, hospitality and entertainment, will particularly hit low-skilled, young, and informal workers.

As districts we have been dealing with a rapid increase in demand and are preparing for this demand to extend and increase further into the foreseeable future, particularly as we approach:

- The easing of lockdown restrictions providing people experiencing domestic abuse with an opportunity to seek help or flee
- The easing of lockdown restrictions meaning that people experiencing relationship breakdown or where family or friends no longer willing to accommodate may seek housing assistance
- The winding down of the govt. assisted furlough scheme leading to risk of increased job losses
- The ending in August of the moratorium on evictions
- The ending of temporary contracts with accommodation providers such as hotels and large venues that have been accommodating rough sleepers and other households at risk of homelessness
- The removal of additional support for those who are NRPF

The priorities outlined within the GNHS and RSS are still highly relevant and more than ever present an opportunity for us to work collaboratively at a local and county wide level to support recovery and prevent homelessness.

2. Which protected characteristics under the Equalities Act 2010 does this Policy impact: (indicate whether the impact could be positive, neutral, or negative)			
Protected Characteristic	Potential Impact		
	Positive	Neutral	Negative
Age	✓		
Disability	✓		
Race	✓		
Sex	✓		
Religion or Belief	✓		
Sexual Orientation	✓		
Marriage/Civil Partnership		✓	
Pregnancy/Maternity	✓		
Gender Reassignment	✓		
3. Which additional Communities characteristics does this policy impact?			
Health	✓		
Place inc. Rurality	✓		
Low Income and Poverty	✓		

3. What do you believe are the potential equalities impacts of this policy?

Please include:

- Partnership organisations worked with in the development of this policy
- Evidence gathered to inform your decision
- Where you have consulted, Who and How this has informed the decision/policy
- Any other groups impacted not detailed above

Note: Impacts could be positive, neutral, or negative and impact groups differently

It is not envisaged that there will be negative impacts felt by those with a protected characteristic as a result of both the GNHS and the RSS being implemented. Questions 3 and 4 of this EqCIA details areas where we feel adoption of the strategy and statement will result in positive impacts.

In formulating the GNHS, the RSS and the subsequent EqCIA we have considered local and national data and also findings from consulting with partners through:

- 2 partner's workshops
- Collaborative working with the Mancroft Advice Project (MAP) on the Single and Youth Homelessness priority
- A drop in session for young people through MAP
- A period of public consultation for the draft homelessness strategy from the period Friday 6th March – Monday 1st June 2020

A list of partners is given below.

Adult Social Care Commissioning - Norfolk County Council
Anchor Project - Leeway
Anglia Care Trust
Aylsham Care Trust (ACT)
Breckland District Council
Change, Grow, Live (CGL)
Children's Services Leaving Care Team
Clarion Housing

Community Chaplaincy Norfolk
DWP
Integrated Offender Management - Norfolk Constabulary
Making Every Adult Matter (MEAM)
Mancroft Advice Project (MAP)
National Probation Service
Norfolk and Suffolk Community Rehabilitation Company (NSCRC)
Norfolk and Suffolk Foundation Trust (NSFT)
Norfolk Community Law Service (NCLS)
Notting Hill Genesis (Sanctuary Housing)
Orwell Housing Association Ltd
Saffron Housing Trust
Shelter
Solo Housing
Soul Foundation
St Giles Trust
St Martins Housing
Stronger Futures Leaving Care Team - Norfolk County Council
The Benjamin Foundation
The Feed
The Magdalene Group
YMCA
Your Own Place CIC
Youth Offending Team (YOT)

Areas of Positive Impact

Domestic Abuse

Domestic Abuse disproportionately affects women and children. National statistics suggest that almost 1 in 3 women aged between 16-59 will experience DA in their lifetime (ONS, 2019). An estimated 20% of children in the UK have lived with an adult perpetrating DA (NSPCC, 2011). In recognition of the impact of DA on young people, the Domestic Bill currently in progress through Parliament was recently amended to recognise children as victims of DA in their own right. At the opposite end of the age spectrum, Safelives reports that on average, older victims experience abuse for twice as long before seeking help as those aged under 61 and nearly half have a disability. (Safelives 2016).

While we recognise the impact of DA on women and children it should also be noted that for those who identify as LGBTQ+, research from Stonewall (2018) suggests that 11% of the LGBTQ+ population have experienced domestic abuse in the previous 12 months; twice as high as the population as a whole. For bisexual women this increases to 13%, and for Trans or non-binary people to 19%. For men, approx. 4.2% of men and 7.9% of women suffered domestic abuse in 2018 (ONS).

From a local perspective, data shows that in the financial year 2018/19 in Greater Norwich 234 households said that the main reason for the loss of their last settled home was because of domestic abuse. The reported number of 234 can be split geographically as follows:

Broadland – 15 households

Norwich – 177 households

South Norfolk – 42 households

Equating to nearly one in ten households overall, however, it is also likely that this number will be higher due to under reporting.

We recognise that for those fleeing DA, it can be an extremely worrying and potentially dangerous period of time. This can be exacerbated for some for whom one or more of the protected characteristics may apply in terms of additional barriers due to their sexuality, gender, immigration status, race or religion and geographical location and that our local knowledge of these barriers can be improved. To this end actions

identified through the GNHS and RSS aim to facilitate and encourage recognition of DA and to seek help. Importantly, we also want to provide accommodation and support options for people that meets their individual needs and circumstances and to improve our own understanding.

Youth Homelessness

H-Click data from 2018/19 across the 3 Local Authorities suggests that of those approaching the councils as homeless or at risk of homelessness those in the 18-24 and 25-34 age groups account for just over 52% of all approaches. As the GNHS states, age is clearly a determining factor in people becoming homeless often due to; low wages; lower welfare payments; or where young people are living at home with friends or extended family in often insecure living situations.

In addition, research by the Albert Kennedy Trust in 2016 found that young people who are lesbian, gay, bisexual and transgender comprise up to 24 per cent of the youth homeless population with the main reasons were parental rejection, abuse within the family or being exposed to aggression and violence.

As part of the development of the strategy, officers consulted with youth organisations and held a drop-in afternoon for young people who had experienced homelessness to understand their experiences and views. From the young people we spoke to, it became clear that social housing was viewed by them as a stepping stone to support their immediate housing needs and that they were invested in relocating to secure suitable work or university opportunities with the ultimate goal being home ownership. While the sample size was small, it highlights the aspirations of young people in respect of housing.

The actions identified in the strategy will seek to prevent youth homelessness but also to offer accommodation that is appropriate for their immediate needs while also supporting long-term aspirations.

Rough Sleeping

The South Norfolk and Broadland First Step Service has been operational since August 2019. The service aims to verify reports of rough sleeping in the area and to work with those to provide a swift means of accommodation, assessment of support needs and options for longer term sustainable accommodation. The service also works closely with the Norwich City Pathways rough sleeping service. During the life of the project so far the First Step Service have responded to reports of 127 people rough sleeping. Of those 80% were male with a remaining split of 14%/6% for Female/Gender unknown.

In terms of age, just under half (48%) were aged between 18-34, perhaps reflecting the issues for young people and homelessness given above and also the lower levels of life expectancy for entrenched rough sleepers, 47 for males and 43 for females. Conversely, 4% of the people referred into First Step were aged 60+ (2F, 1M) although it should also be noted that we do not have ages for approx. 15% of the cohort. 6% of those reported identified as being disabled.

The data above provides some demographic detail of people who have been reported into the First Step Service. However, the South Norfolk and Broadland Rough Sleeper Statement clearly sets out the strategic objectives and ambitions to end rough sleeping for all those of no fixed abode or at risk of rough sleeping. Embedding the rapid response work we undertook with partners in relation to Covid-19, we have the opportunity to do this not just at a local level but also within the county.

5. What do you believe are the potential Communities impacts of this policy?

Please include:

- How the policy can meet agreed priorities
- Evidence gathered to inform your decision
- Partnership organisations worked with in the development of this policy
- Where you have consulted, Who and How this has informed the decision/policy
- Any other groups impacted not detailed above

Note: Impacts could be **positive**, **neutral**, or **negative** and impact groups differently

Areas of Positive Impact

Health and Mental Health

Insecurity of housing, homelessness and the threat of homelessness are major contributors to ill health, particularly mental health with studies indicating that existing health conditions are also exacerbated by homelessness or unsuitable housing.

In addition, a 2017 report by the LGA: *The Impact of Homelessness on Health* found that there are correlations between:

- Financial problems and mental health
- Housing insecurity and anxiety, stress, loss of confidence and worry about the future
- Overcrowding and mental health, particularly for children and young people
- Stress, anxiety, depression and other mental health problems and poor housing conditions
- Self-medication with alcohol and drugs.

For those who are rough sleeping, of those supported by the First Step service, 50% reported at least one mental health condition, 36% reported substance misuse and 24% reported alcohol misuse. It is likely that this is subject to underreporting and given the numbers it is also likely that some people will be experiencing one or more of these at the same time.

Both the Greater Norwich Homelessness Strategy and the South Norfolk and Broadland Rough Sleeper Statement aim to have a positive impact on Health. Priority two of the GNHS focusses on preventing homelessness and by taking a wrap-around early preventative approach we can seek to offer a multi-agency response including from health and mental health service providers to identify areas of support that will aim to reduce housing insecurity, promote sustainable options and improve health outcomes. A similar objective has also been recognised within the Rough Sleeper Statement.

In addition, supporting the introduction of the Norfolk Mental Health Hospital Discharge and Homelessness Prevention Protocol will help to prevent people from becoming homeless at the point they are discharged from a Mental Health hospital ensuring that all partner agencies including housing, health and social care are working together to facilitate the most appropriate support and accommodation for that person.

Place inc. Rurality

The sub-region of Broadland, Norwich and South Norfolk is an area of approx. 583 sq miles, just slightly less than that of Greater London and comprises a mix of urban, suburban, town and rural areas. We recognise that each area will have particular challenges in terms of homelessness, for example people who are rough sleeping may gravitate towards the urban centre where there are more likely to be specific services and a greater sense of safety in numbers and some may prefer the rural areas where there is less visibility. In addition, for other contributors of homelessness, such as DA for example, it can be harder to recognise, report and access appropriate support in rural areas (National Rural Crime Network, 2019). Local knowledge of these challenges helps us to work together to prevent homelessness, for example through our Help Hubs, while on a wider level both the GNHS and RSS seeks to contribute to the wider work taking place such as the Greater Norwich Local Plan which aims to meet local housing and economic growth needs whilst also protecting and enhancing the environment.

Poverty and Low Income

H-Clic data from 2018/19 across the 3 Local Authorities suggests that of those approaching the councils as homeless or at risk of homelessness, End of private rented sector tenancy and Family or friends no longer willing to accommodate all feature within the top four reasons for the approach.

When viewing the household types approx. 62% comprised of single adults, with a higher proportion of males and 22% were single parents with dependents with a higher proportion of females. It should be noted that these figures have been averaged over the 3 local authorities for approaches at both the prevention and relief duty stage and there will be variations, for example, 60% of approaches to Norwich City at the relief duty stage were from single males.

While not conclusive, it indicates that affordability of housing where there is only one income is an issue for households in the sub-region, particularly when considered with data above detailing a higher proportion of young people approaching for assistance.

Furthermore, private rental prices average at £404 pm in Norwich for a room in a shared property and £788 across the sub-region for a three bedroom property (ONS, 2020). Applying the salary principle of 30x monthly rent used by letting agents to determine affordability this requires an annual salary £12,409 and £23,640. For those eligible for assistance with housing costs, a welcome rise in Local Housing Allowance (LHA) rates was introduced in April 2020, however there can still be considerable shortfall for households to make up. An average of £45 pm for a room in a shared property to £82 pm for a three bedroom property. It should also be noted that locally approx. 20-25% of households in the sub-region in receipt of help with housing costs are in employment.

The GNHS prioritises financial inclusion and supporting the economic growth agendas across the sub-regional area including through improving access to skills, training and employment opportunities and delivery of affordable housing either through affordable rent or affordable home ownership. This will have a positive impact in terms of increasing housing options for our residents, maintaining that housing and reducing homelessness.

6. How is it proposed that any identified negative impacts are mitigated?

Please include:

- **Steps taken to mitigate, for example, other services that may be available**
- **If a neutral impact has been identified can a positive impact be achieved?**
- **If you are unable to resolve the issues highlighted during this assessment, please explain why**
- **How impacts will be monitored and addressed?**
- **Could the decision/policy be implemented in a different way?**
- **What is the impact if the decision/policy is not implemented?**

As stated above the Greater Norwich Homelessness Strategy and the South Norfolk and Broadland Rough Sleeper Statement seeks to have a positive effect on those who are homeless or at risk of homelessness. However, we also acknowledge that Covid-19 has exacerbated and widened inequalities, particularly amongst:

- People with a BAME background,
- People living in poverty, on low incomes or just finishing their education
- Those in unaffordable, insecure or unsuitable housing,
- People experiencing Domestic Abuse
- People experiencing social exclusion and isolation
- Those with health conditions including mental health

Looking ahead, it is believed that these inequalities and the impacts of them will become more apparent and to that end, this EqCIA will be monitored as part of the annual review process.

Signed by evaluator: Victoria Parsons/Chris Hancock

Signed by responsible head of department:

Please send your completed forms to the equalities lead Victoria Parsons to be reviewed and stored in accordance with our legal duty.

REVIEW DATE - _____

(See Page 2 for details of reviews. Please send a copy of the reviewed document to Victoria Parsons)