

Agenda

CABINET

Members of the Cabinet

Portfolio

Date

Monday 2 November 2020

Mr J Fuller
(Chairman)

External Affairs and
Policy

Mrs K Mason Billig
(Vice Chairman)

Governance and
Efficiency

Mrs Y Bendle

Better Lives

Mr M Edney

Clean and Safe
Environment

Mrs L Neal

Stronger Economy

Mrs A Thomas

Customer Focus

Mr J Worley

Finance and
Resources

Time

9.00 am

Place

To be hosted remotely at:
South Norfolk House
Cygnet Court
Long Stratton
Norwich
NR15 2XE

PUBLIC ATTENDANCE

This meeting will be live streamed for public viewing via the following link:

<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 democracy@s-norfolk.gov.uk, no later than 5.00pm on Thursday 29 October 2020

Contact

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**If you have any special requirements in order to attend this meeting,
please let us know in advance
Large print version can be made available**

Agenda

1. To report apologies for absence
2. Any items of business which the Chairman decides should be considered as a matter of urgency pursuant to Section 100B(4)(b) of the Local Government Act, 1972. Urgent business may only be taken if, "by reason of special circumstances" (which will be recorded in the minutes), the Chairman of the meeting is of the opinion that the item should be considered as a matter of urgency;
3. To Receive Declarations of Interest from Members (please see guidance – page 3)
4. To confirm the minutes of the meeting of Cabinet held on 28 September 2020
(attached – page 5)
5. Budget Update Report (report attached – page 12)
6. Review of Earmarked Reserves (report attached – page 25)
7. Treasury Management Quarter 2 Report 2020/21 (report attached – page 31)
8. Strategic Performance, Risk and Finance Report for Quarters 1 and 2 2020/21;
(report attached – page 39)
9. Approval of Revised UK Municipal Bond Agency's Framework Agreement
(report attached – page 91)
10. The Vision for a Best in Class Housing Offer and Draft Allocations Scheme;
(report attached – page 95)
11. Housing Standards Enforcement Policy; (report attached – page 289)
12. Public Space Protection Order – Dog Fouling (report attached – page 318)
13. Planning Enforcement Plan and Strategy (report attached – page 326)
14. Cabinet Core Agenda (attached – page 342)

Agenda Item: 3

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.

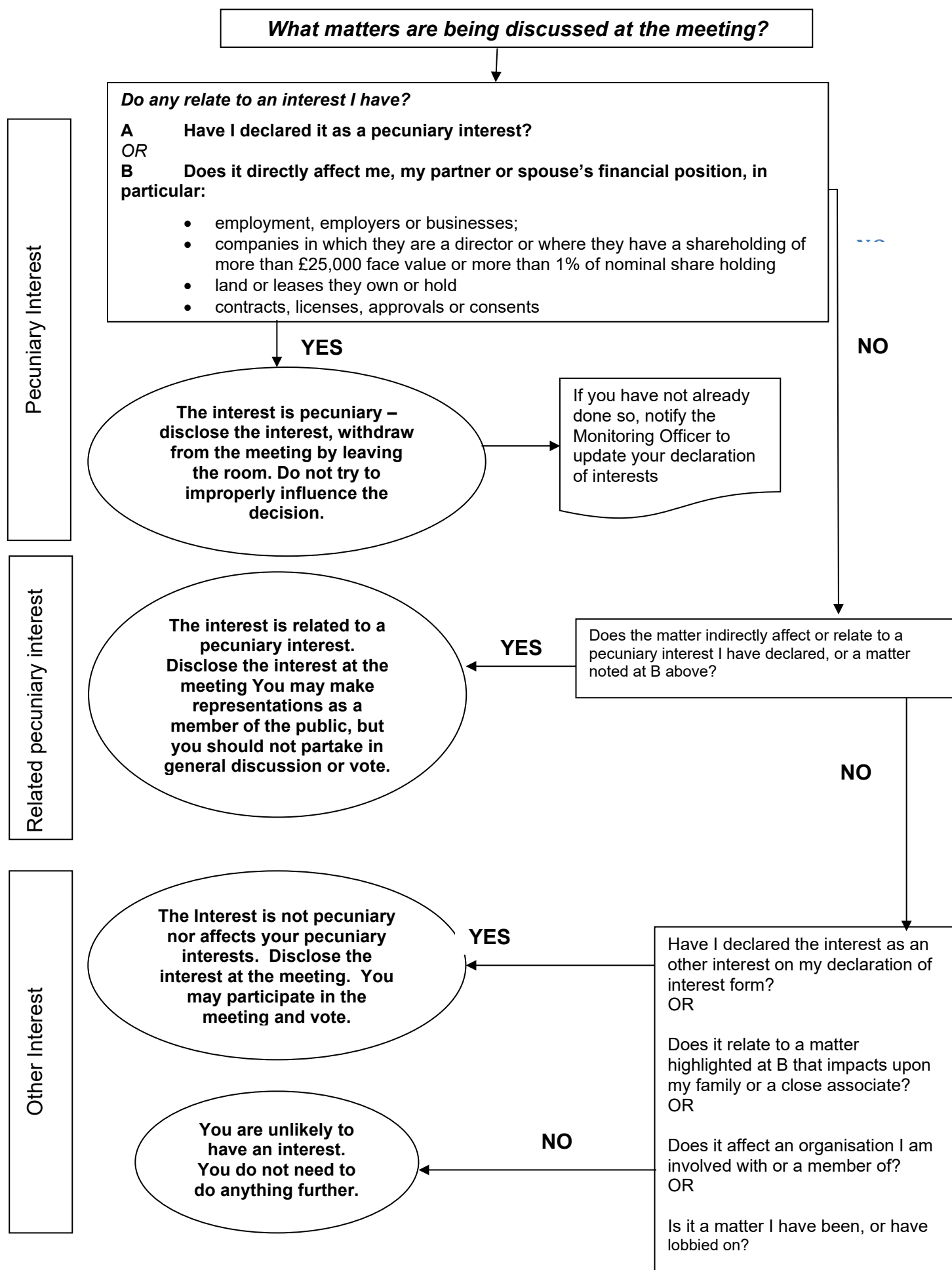
Does the interest indirectly affect or relate any pecuniary interest you have already declared, or an interest you have identified at 1-5 above?

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 you should not partake in general discussion or vote.

Is the interest not related to any of the above? If so, it is likely to be an other 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**





CABINET

Minutes of a remote meeting of the Cabinet of South Norfolk District Council, held on Monday 28 September 2020 at 9.00 am.

Members Present:

Cabinet: Councillors: J Fuller (Chairman), Y Bendle, M Edney, L Neal, K Mason Billig, A Thomas and J Worley

Non-Appointed Councillors: C Brown, A Dearnley and T Laidlaw

Officers in Attendance: The Managing Director (T Holden), the Director of Communities (J Sutterby), The Director of Resources (D Lorimer), the Assistant Director Chief of Staff (H Ralph), the Assistant Director Individuals and Families (M Pursehouse), the Assistant Director Governance and Business Support (E Hodds), the Assistant Director Finance (R Fincham), the Assistant Director Planning (H Mellors), the Housing and Wellbeing Senior Manager (R Dunsire) and the Policy and Partnership's Officer (V Parsons).

2825 MINUTES

The minutes of the Cabinet meeting held on 24 August 2020, were confirmed as a correct record and signed by the Chairman.

2826 UPDATED DELIVERY PLAN POST COVID-19

The Chief of Staff introduced the report, which presented Members with an updated Delivery Plan for 2020/21, reflecting the updated priorities of the Council, following the recent impacts of the Covid-19 pandemic.

The Assistant Director Chief of Staff briefly outlined the key changes to the document. Members noted that a one-year plan was also proposed for 2021/22 due to the unpredictable nature of the pandemic and the need for the Council to remain as flexible as possible.

The Chairman referred to the total controllable funding for both South Norfolk and Broadland Councils (detailed at page 19 of the agenda) and asked how officers would ensure that there was no cross subsidising between the two authorities. The Managing Director advised Members that systems had been developed to apportion costs and savings across the two Councils, and that this had been approved by the auditors and would require revalidation every other year, to provide constant assurance. The Assistant Director Finance explained that the

South Norfolk costs were nearly double than that at Broadland, due to the size of South Norfolk's capital programme.

Reference was made to the future of the Waste Service, following the outcome of the Waste Services Review at both Councils, and the Director Communities advised that there was a significant future programme of works to consider, one being the current set up at Ketteringham depot. Thought would also be given to the possibility of developing a Local Authority Trading Company for South Norfolk Council and also scope for collaboration with other neighbouring authorities. Officers confirmed that work had commenced at Broadland with regard to the retender of its current waste contract.

The Chairman suggested, and it was agreed that the document also required references to the Prosperity Fund and the Greater Norwich Growth Board, and how the Council might prepare for future projects.

The vote was taken by roll call and it was unanimously

RESOLVED TO RECOMMEND THAT COUNCIL

1. Approves the adoption of the updated Delivery Plan for 2020/21.
2. Approves the development of a one-year plan for 2021/2022, returning to Councils in February 2021.

The Reason for the Decision

To ensure that the Council has a clear view of its priorities and has the correct resources in place to plan and respond effectively.

Other Options Considered

To retain the original proposal to develop a two-year plan.

2827 GREATER NORWICH HOMELESSNESS STRATEGY 2020-2025 AND SOUTH NORFOLK AND BROADLAND ROUGH SLEEPER STATEMENT 2020-2022

Members considered the report of the Policy and Partnerships Officer, which presented Cabinet with the Greater Norwich Homelessness Strategy 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022.

The Policy and Partnerships Officer presented her report, explaining that the Rough Sleeper Statement would be produced in conjunction with both Broadland and Norwich City Councils from 2022.

In terms of the Strategy, this was based on four priorities which had been developed and tested across the current Covid-19 situation. The Policy and Partnerships Officer explained that although mental health was not a priority on its own, this issue was a common theme which ran through all four priorities. Members noted that the Greater Norwich Housing Forum, a sub-regional group set

up by the three authorities, would be responsible for drawing up the Action Plans for each priority and monitoring progress.

Officers explained that the Strategy aimed to develop priorities and actions to further develop the joined up approach to tackling homelessness with partners and would feed in to the work to redesign the housing offer across the District, in taking a person centred approach, and also linking in with the Council's recovery work from Covid-19.

The portfolio holder, Cllr Y Bendle commended the report to Members, and thanked officers for a comprehensive document. She encouraged all members to attend the briefing session the following evening regarding the 'Best in Class Housing Offer'.

Members referred to funding received by Norfolk County Council through the Next Steps Accommodation Programme. The Housing and Wellbeing Senior Manager explained that South Norfolk had also applied for funding to assist in securing suitable accommodation for those with high support needs.

Members referred to the net housing completions and the affordable housing completions, detailed in the Homelessness Strategy and were pleased to note that over the last five years, completions in South Norfolk accounted for over 50% of the total across the three authorities, and over 48% of the total for affordable housing.

Voting was then carried out by way of a roll call, and it was unanimously

RESOLVED To approve adoption of the Greater Norwich Homelessness Strategy 2020-2025 and the South Norfolk and Broadland Rough Sleeper Statement 2020-2022.

The Reason for the Decision

To ensure an effective response to the prevention of homelessness and the ending of rough sleeping in the area.

Other Options Considered

None

2828 COUNCIL TAX COVID-19 HARDSHIP FUND 2020-21 EMERGENCY PROCEDURES / POLICY

Members considered the report of the Housing and Wellbeing Senior Manager which sought retrospective approval for the Council Tax Covid-19 Hardship Fund 2020-21 Policy.

The Housing and Wellbeing Senior Manager presented his report, explaining that since March 2020, the Council had administered the Council Tax Covid-19 Hardship Fund, following guidance issued by the Ministry of Housing,

Communities and Local Government. Retrospective authorisation was now sought as funds had been issued under discretionary powers s13A (1)(c) Local Government Finance Act 1992.

Members noted that the Council had received a funding allocation of £756,235, which had allowed all those in receipt of Council Tax Support to receive an additional £150 off their Council Tax bill. For those with a liability of less than £150, the resident's liability was reduced to nil. The Housing and Wellbeing Senior Manager explained that all new claims were also entitled to this discount.

In addition to this, the Council had also set up a discretionary pot of which £80,000 still remained. However, it was noted that some aspects of the discretionary fund policy might be covered under a new Track and Trace Isolation Fund, recently announced by the Government.

Voting was then carried out by way of a roll call, and it was unanimously

RESOLVED To agree the policy for the Council Tax COVID-19 Hardship Fund 2020-21

The Reason for the Decision

To ensure that additional support is available to those who need it.

Other Options Considered

None.

2829 RESPONSE TO MINISTRY OF HOUSING, COMMUNITIES AND LOCAL GOVERNMENT CONSULTATIONS

Members considered the report of the Assistant Director Planning, which sought Cabinet approval on Council responses to two government consultations; the White Paper: Planning for the Future, and Changes to the current Planning System.

The Assistant Director Planning introduced the report to Members, briefly outlining the proposed responses as set out in the report. Members noted that the comments from the Regulation and Planning Policy Committee had yet to be incorporated.

Cabinet turned firstly to Appendix 1; the White Paper 'Planning for the Future' and the Assistant Director Planning summarised the changes proposed at the Regulation and Planning Policy Committee at its meeting on 12 October:

Question 6:

The need to stress the importance of still having local planning policies;

Question 8a:

That the methodology as proposed would not be deliverable for the Greater Norwich area and could undermine the ability to deliver houses.

Question 10:

To add statistics, for example how quickly applications were determined, how many were delegated, how many get approved and the success rate of appeals.

Question 15:

To emphasise that the Council already has a Place Shaping Guide.

During discussion members suggested that the comments around community engagement required strengthening. In terms of sustainability, it was also suggested that the response needed to stress that South Norfolk was a rural area, and that reliance on the motor car was essential. The Chairman referred to the response regarding Community Infrastructure Levy and suggested that a single CIL to cover all circumstances was not viable, and that a much more sophisticated approach was required. The need to ensure the supply of affordable housing was also raised.

The Chairman referred to the comments set out in a proposed motion to Council, at its meeting on 21 September, and requested that some of the issues raised, be fed in to the response.

It was agreed that Cllr L Neal would email all members asking for any further comments with regard to the White Paper, before the Council's response was finalised.

Turning to Appendix 2, the draft response to the Changes to the current Planning System, Cabinet agreed that these responses required some significant work. There was a need to expand some responses and also to strengthen the language in some areas. Members also requested more examples of the impact of the proposed methodology.

The Assistant Director Planning agreed that more detail was required, especially around methodology, and she explained that there had been considerable discussion at the Policy Committee, particularly with reference to affordable housing.

Voting was carried out by way of a roll call and it was unanimously

RESOLVED

1. To note the early draft responses to the MHCLG consultation documents, as outlined in appendices 1 and 2 of the report:
2. To agree that the responses require further amendment, with final approval to be delegated to the Director of Place, in consultation with the Leader of the Council, and the Portfolio Holder for Stronger Economy.

The Reason for the Decision

To ensure that the Council takes the opportunity to convey its views to Government.

Other Options Considered

None.

2830 DEVOLUTION AND LOCAL GOVERNMENT REORGANISATION

Members considered the report of the Managing Director, which provided an overview of the current context and developments and potential next steps for South Norfolk Council, with regard to Devolution and Local Government Reorganisation.

Members noted that the publication of the Government's Recovery and Devolution White Paper had been delayed due to Covid-19, and was expected later this year, or early January 2021. The Managing Director explained that it would be a fast-moving agenda, and that it was entirely appropriate for officers to start to undertake preparatory work to ensure the Council's readiness to respond appropriately, when needed.

The Chairman stressed the importance of focussing on the needs of the community and the recovery, in light of Covid-19, and had been disappointed by recent comments made by a small number of county councils, in a bid to ensure their survival.

Voting was carried out by way of a roll call and it was unanimously

RESOLVED

1. To note the current developments for devolution and local government reorganisation nationally.
2. Subject to the issue of the White Paper or demonstrable intent by Central Government to progress Local Government Reorganisation; to endorse the use of officer time and resource within current budgets, where appropriate and with agreement by the Leader of the Council, in order to undertake preparatory work to ensure the Council's readiness to respond appropriately to the Recovery and Devolution White Paper, which is anticipated to be published in the autumn.

The Reason for the Decision

To ensure that the Council is in a position to be able to respond to the White Paper, when published, and to seize any opportunities it might bring.

Other Options Considered

None.

2831 CABINET CORE AGENDA

Members noted the considerable number of reports for consideration at the November meeting of the Cabinet, and stressed their forbearance, should any reports need to be delayed due to officer time being diverted to other services, because of the impact of Covid-19.

The Chairman suggested that it would be appropriate to consider a paper in November regarding the Harleston public realm improvements project.

The Director Communities confirmed that an update report regarding waste, could be presented at the December meeting.

2832 EXCLUSION OF THE PRESS AND PUBLIC

It was

RESOLVED: To exclude the public and press from the meeting under Section 100A of the Local Government Act 1972 for the following item of business on the grounds that it involve the likely disclosure of exempt information as defined in paragraph 3 of Part 1 of Schedule 12A to the Act (as amended)

2833 EXEMPT MINUTE

The minute of the meeting held on 24 August 2020 regarding the Waste Services Review was agreed as an accurate record.

(the meeting concluded at 10.25 am)

Chairman

BUDGET UPDATE REPORT

Report Author(s): Rodney Fincham
Assistant Director Finance
rfincham@s-norfolk.gov.uk

Portfolio: Finance & Resources

Ward(s) Affected: All

Purpose of the Report: To provide an update on the budgetary position.

Recommendations:

Cabinet to recommend to Council the following:

1. To increase the SNC 20/21 IT Capital Budget by £141,000, to fund the rollout of additional laptops to better facilitate the New Ways of Working:
2. To increase the SNC annual Revenue Budget by £44,000 (with a pro-rata adjustment for 20/21 as only a part year effect) to fund an additional resource to help implement the actions set out in the recently agreed Environmental Strategy.
3. To agree that the unspent 'joint waste budget' can be applied to cover the costs of developing a full business case for a LATC and depot projects.
4. To increase the budgetary provision for Covid 19 expenditure from £250,000 to £305,000 to cover the additional £55,000 regulatory expenditure.
5. To reduce the budgetary provision for Covid 19 direct hardship payments by £68,000 and return the money to the main Council Tax Support hardship allocation.
6. To agree the proposed changes to the 20/21 income budgets as set out in paragraph 4.17.
7. To agree that the Assistant Director Regulatory is authorised to spend the new Coronavirus Enforcement grant of £57,176, to help the public and businesses understand the latest Covid 19 regulation, and increase compliance work and enforcement checks on businesses.
8. To remove the post of Assistant Director Consultancy Team from the establishment.

Cabinet to note the updated Medium Term Financial Strategy.

Cabinet to agree that approval of criteria for the distribution of discretionary local lockdown grants be delegated to the Assistant Director Economic Growth in consultation with the Portfolio Holder for Economic Development.

1 ROLLOUT OF LAPTOPS

- 1.1 At present only 327 officers have laptops.
- 1.2 As part of our New Ways of Working, we have now categorised our staff as either:
 - Permanent home worker 80 (Will work primarily from home)
 - Home enabled worker 396 (Will work a mix of at home & in the office)
 - Dedicated office worker 70 (Will work primarily from the office)
- 1.3 Permanent home workers and Home enabled workers will need to be provided with a laptop, with appropriate accessories, in the first instance as this will allow them the flexibility to work in multiple locations as and when required outside of their working location classification.
- 1.4 Dedicated officer workers should also move onto a laptop rather than a desktop PC as this allows for more flexibility in terms of mobility and agile working when required – an example of this would be if there were to be a further lockdown and these staff need to relocate to work from home.
- 1.5 In addition to the provision of laptops, we also wish to supply laptop bags and wireless keyboards/mice. This will mean that staff can transport their own equipment and will not have to share peripherals such as keyboards and mice in the office or at other locations. This will in turn help to enhance the Covid secure working arrangements. There is also a need to purchase extra external monitors so that every desk in the offices for dedicated office workers and home enabled staff is equipped with a single 27"+ external monitor.
- 1.6 Both Councils currently have existing annual budgets for the rolling replacement of IT equipment which has reached the end of its operational life. However as can be seen above we are currently 219 laptops short. Therefore, to complete a roll out of laptops plus peripherals we need a further £256,000 (including 20% contingency) split BDC 45%, SNC 55%. Please note that the overall costs are for laptops, associated accessories, and monitors.
- 1.7 **Member approval is therefore requested to increase the SNC 20/21 Information Technology Capital Budget by £141,000, to fund the rollout of additional laptops to better facilitate the new ways of working:**

2 ENVIRONMENTAL STRATEGY

- 2.1 SNC is committed to continuous environmental improvement; playing our part in tackling environmental challenges and improving the quality of the local environment.
- 2.2 On 27 July 2020, Full Council agreed an ambitious new Environmental Strategy. This Strategy expands on the objectives set out in the Strategic Plan, showing the Council's approach to addressing environmental concerns within the organisation and within the district and highlighting where communities and businesses can work with us.
- 2.3 As detailed within the Issues and Risks section of the Environmental Strategy Report to Cabinet on 21 July 2020.
- There is currently no dedicated staff resource to provide a strategic response to climate change issues. At the moment, all activity and development work is being covered by existing staff from a number of teams, aligned to the purpose of this agenda. In addition, the ability to fully exploit future funding opportunities could be progressed with suitable funding and investment.*
- 2.4 Officers have now reflected on the available resources, taking account of Members desire to progress with the Strategy quickly.
- 2.5 To increase the SNC annual Revenue Budget by £44,000 (with a pro-rata adjustment for 20/21 as only a part year effect) in order to allow for a new permanent role of Environmental Strategy Coordinator.**
(Note: BDC and SNC are being requested to agree one post each. In reality if both Councils agree, the 2 co-ordinators will work together to progress both Strategies, and the costs will be shared 45%/55%).
- 2.6 This role will help drive the implementation of the strategy and coordinate the various strands of work. It will enable the strategy to be robustly monitored and for successes and progress to be publicised. Without this role there is a risk that the strategy will be a piecemeal continuation of 'business as usual' with a limited sense of corporate ownership.
- 2.7 In addition to this new role, it is also proposed to use the National Graduate Trainee, that has recently been appointed, to help support this work as part of their placement. The Graduate trainee will be able to support some of the groundwork under the supervision of the Co-ordinator.

3 WASTE UPDATE

- 3.1 In the 20/21 Revenue Budget there is a budgetary allowance of £125,000 for the 'joint waste project'. Spend against this budget has been £34,000 (£62k x 55%).
- 3.2 Given recent decisions on the future provision of waste services, it is now necessary to repurpose the remaining budget to provide resource to develop a business case for the establishment of a South Norfolk LATC, and to develop options to improve the Ketteringham Depot.

- 3.3 Members are therefore requested to agree that the unspent 'joint waste budget' can be applied to cover the costs of developing a full business case for a LATC and depot projects.**

4 COVID 19 INCOME AND EXPENDITURE

A) Direct Expenditure – Regulatory Services

- 4.1 Due to the COVID-19 pandemic, our food safety (along with workplace safety) and Licensing regulatory services have been seriously impacted and face a range of service demands beyond the capacity of existing staffing resources.
- 4.2 Some businesses have continued to operate in differing ways throughout the Covid-19 lockdown whereas others will have experienced a complete business interruption or a range of increasing pressures. Whilst in many the attention to regulatory compliance will be undiminished, there is a risk that a few will have cut corners or adopted unsafe methods.
- 4.3 It was not possible to conduct regulatory inspections of businesses during the emergency restrictions and under prevailing changes in national guidance to regulators. There are programmed work backlogs, worsening of public protection / business threats requiring attention, and new areas of Covid-19 service demand. In some areas, worsening business conditions will increase needs for regulatory surveillance and intervention to protect the public. The Food & Safety and Licensing teams have been operating at stretch for a sustained period and this poses significant risks to operational service delivery, together with potential compromise to strategic aims.
- 4.4 It is the additional requirements for COVID-19 support to businesses and protection of the public which is most challenging team capacity. We need to commence a substantive program of face-to-face business contacts targeting sectors which either pose risks of blatant disregard for social distancing and hygiene controls or possess low confidence and competence to keep staff and the public safe. These premises are where we may most likely anticipate new clusters of COVID-19 infection arising in our district.
- 4.5 CMLT have therefore approved 3 additional posts for a limited period at a cost of £100,000 (split BDC 45%, SNC 55%)
- £50k EHO Food & Safety & Infectious Disease, 12 months
 - £25k Licensing & Enforcement Officer 0.5FTE, 12 months
 - £25k Interim Licensing team leader (short term).
- 4.6 These additional resources have now been recruited, and are already starting to help.
- 4.7 If Covid work subsides, this additional resource would also be used to help support any additional duties arising from the forthcoming Brexit changes.
- 4.8 As these costs are COVID 19 related, Members are now requested to retrospectively approve the allocation of COVID 19 grant funding to cover these costs.**

B) Hardship Direct Payments

- 4.9 The Emergency Committee on 5 June 2020, endorsed a provision of £100,000 to cover direct hardship payments to residents during the Covid 19 pandemic.
- 4.10 This was funded by top slicing the Government hardship funding of £756,235 that SNC received to cover the cost of awarding £150 council tax support to all working age Council Tax Support claimants.
- 4.11 As at end September £22,000 has been paid out in direct hardship payments to residents.
- 4.12 Members are therefore requested to reduce the top slice to £32,000. This will allow £68,000 to be returned to help cover the cost of the £150 council tax discounts which are currently standing at £671,000.**

C) Income Compensation Scheme for Lost Sales, Fees and Charges

- 4.13 The Emergency Committee on 5 June 2020 agreed to reduce the 20/21 income budgets by £3,233,000 to reflect estimated lost income due to the Covid 19 pandemic.
- 4.14 On 2 July 2020 Government announced a new, one-off income loss scheme that will compensate councils for irrecoverable and unavoidable losses from sales, fees and charges.
- 4.15 The scheme involves a 5% deductible rate, whereby authorities will absorb losses up to 5% of their planned 2020/21 sales, fees and charges income, with Government compensating them for 75p in every pound of relevant loss thereafter.
- 4.16 It is therefore now necessary to review the income budgets again to reflect the new income loss scheme. Initial projects are showing that the authority will recoup about 55% of the income loss as follows:

Income Loss	£3,233,000
Less commercial	£ 100,000 (unable to claim commercial losses)
Less offsetting savings	£ 432,000
Less 5% deductible	<u>£ 430,000</u>
	£2,371,000
75% claim amount	£1,778,000

- 4.17 The following table therefore shows the original budget reductions and the new proposed changes.

	Original Budget	Change	Amended Budget	Estimated Compensation	New Amended Budget
	£'000	£'000	£'000	£'000	£'000
Leisure Facilities	3,371	-2,247	1,124	1,271	2,395
Planning	1,310	-328	982	197	1,179
Building Control SNC	505	-126	379	76	455
Building Control Other (1)	1,352	-	1,352		1,352
Car Parking	356	-178	178	107	285
Waste Charges	656	-13	643	8	651

	Original Budget £'000	Change £'000	Amended Budget £'000	Estimated Compensation £'000	New Amended Budget £'000
Commercial Income (2)	520	-100	420		420
Land charges	330	-83	247	50	297
Housing Benefit Overpayment	400	-100	300	60	360
Pest control fees	60	-15	45	9	54
Council Tax recovery	170	-43	127		127
Licensing	165	-	165		165
Recycling credits	776	-	776		776
Green Waste	2,042	-	2,042		2,042
Other income and service specific grants	4,507	-	4,507		4,507
Total	16,520	-3,233	13,287	1,778	15,065

Note: The compensation payment is not a straight 75% of the lost income as the Council is required to deduct any compensating savings (ie by holding posts vacant or redeploying staff) from the amount claimed.

(1) SNC will be reclaiming lost Building control income on behalf of the consortium.

However, their figures are not shown above.

(2) Cannot reclaim lost commercial income.

4.18 Members are requested to agree the proposed changes to the 20/21 income budgets.

D) Discretionary Local Lockdown Grants

4.19 On 9th September 2020, Government announced a new Local Restrictions Support Grant to support businesses that are required to close during localised Covid 19 restrictions.

4.20 The rules announced were that eligible businesses who are within the relevant Local Authority area covered by localised restrictions will receive a grant of up to £1,500 for each eligible hereditament (ie business rates assessment) and for each three-week period that the restrictions are imposed as a result of the use of Government powers.

4.21 Then on 9th October the grant values were changed to the following

- Where rateable value is less than £15,000, grant of £1,334 per month
- Where rateable value between £15,000 and £51,000, grant of £2,000 per month
- Larger businesses can claim £3,000 per month.

The payment period also changed from every three-weeks to fortnightly

4.22 The Local Authority will receive an additional 5% of top-up funding allowing the Local Authority to run a local discretionary scheme to provide support to non-business rate paying businesses that are required to close, as well as other businesses that are not required to close but which may be severely affected (e.g. as a result of the closure of customer businesses). It will be at the Local Authority's discretion as to which types of closed and severely impacted businesses are most relevant to their local economy. There will be no penalty for Local Authorities

because of their use of discretion to prioritise some business types. Local Authorities may use their discretion to provide grants of any value up to and including £1,500.

- 4.23 The precise set of businesses eligible for the scheme may vary between each local lockdown area based on the localised restrictions that are established in recognition of the specific evidence and conditions for each area.
- 4.24 Although we hope that our district will avoid any localised restrictions, it is sensible to be prepared just in case. Officers are therefore currently undertaking preparatory work, and it would be prudent to agree a delegation to agree any discretionary local lockdown grant scheme in order to be able to act promptly should the need arise.
- 4.25 Members are therefore asked to agree that approval of criteria for the distribution of discretionary local lockdown grants be delegated to the Assistant Director Economic Growth in consultation with the Portfolio Holder for Economic Development.**

E) Coronavirus Enforcement

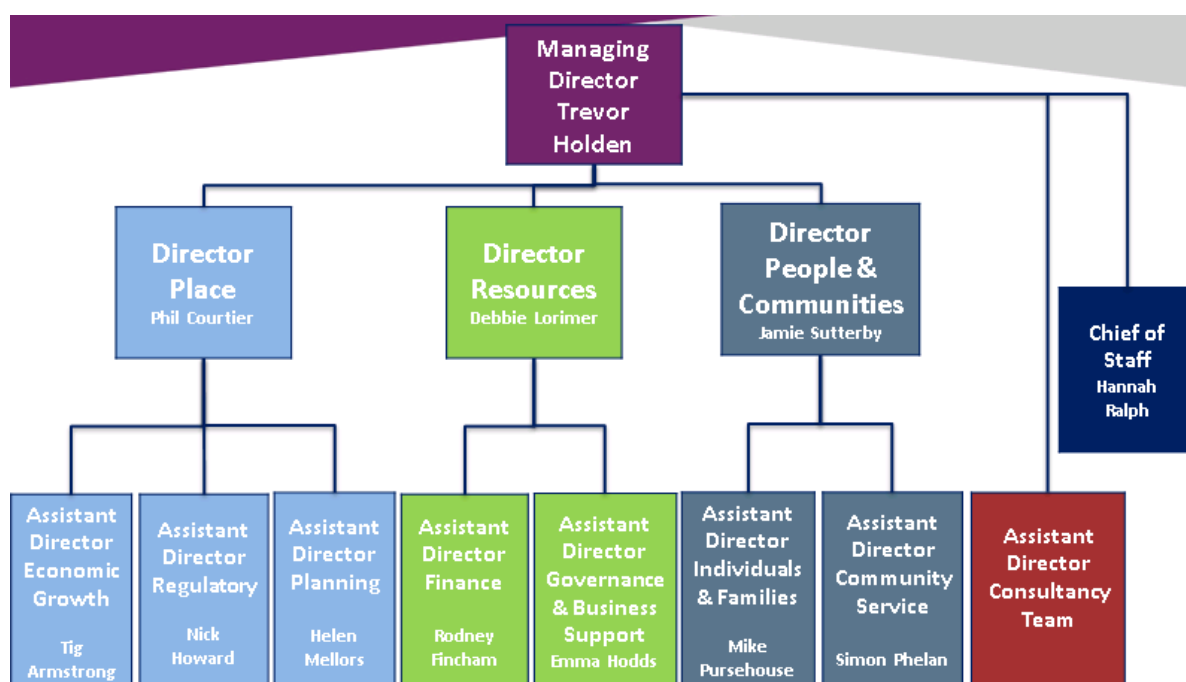
- 4.26 Local authorities play a central role in ensuring compliance with COVID-19 guidance in their local communities. Enforcement officers such as Environmental Health Officers (EHOs) are responsible for explaining and encouraging businesses and communities to follow the latest guidelines, carrying out inspections, issuing fines and closing premises in the case of non-compliance.
- 4.27 On 8 October Government announced £60 million 'surge funding' to boost Coronavirus enforcement with £30 million each for police forces and local councils.
- 4.28 SNC has been allocated £57,176. The money will be ringfenced to spend on COVID-19 related compliance and enforcement activities.
- 4.29 The Government has also published new guidance outlining the types of compliance and enforcement activities councils could carry out using the £30 million funding. This includes covering costs associated with stepping up enforcement activity, measures to help the public and businesses to understand the latest regulations and funding the cost of dedicated staff to encourage compliance with the rules, including marshals.
- 4.30 Resourcing this new responsibility will be challenging, as it is difficult to recruit additional appropriately trained EHO staff. It is therefore likely that the Assistant Director Regulatory will need to ask existing EHOs to work extra hours. In general, under the Council's One Team Terms and Conditions, overtime is only paid in exceptional circumstances. Senior officers consider this to be an exceptional circumstance.
- 4.31 Members are therefore asked to agree that the Assistant Director Regulatory is authorised to spend the new Coronavirus Enforcement grant of £57,176 to help the public and businesses understand the latest Covid 19 regulation, and increase compliance work and enforcement checks on businesses.**

F) Future Preparations

- 4.32 In order to be as ready as possible, it is important that the Council prepares for potential Covid challenges over the next 6-12 months.
- 4.33 Work is therefore underway to ensure the Councils have the appropriate resources in place, and if necessary a future report will be prepared for member consideration.

5 ESTABLISHMENT

- 5.1 The current senior management establishment is as follows:



- 5.2 The post of Assistant Director Consultancy Team, has only briefly been filled. This post is currently vacant, and is not budgeted for. Key responsibilities of this role were picked up as part of the one team restructure, and absorbed into the transformation team under the leadership of the Chief of Staff.
- 5.3 **Members are therefore requested to agree that the post of Assistant Director Consultancy Team is removed from the establishment.**

6 MEDIUM TERM FINANCIAL STRATEGY UPDATE

- 6.1 Following recent decisions and the information above, it is appropriate to update the Council's Medium Term Financial Strategy.

A) MTFS - As Presented in Jun 20

- 6.2 The 'Review of 2020/21 Budgets' report presented to the Emergency Committee on 5 June 2020, included a MTFS.

- 6.3 This reported a funding gap of £0.7m in 20/21, followed by a funding gap of between £0.8m-£1.3m in future years as follows.

	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000
Net Budget Requirement	17,237	16,269	14,520	14,413	14,583
Total Funding	16,534	14,547	13,752	12,923	13,270
Funding Gap / (Annual Supplus)	703	1,722	768	1,490	1,313

B) MTFS – Update

- 6.4 The MTFS assumptions have now been reviewed and the following changes made.

Impacts on Net Budget Requirement

- Inflation assumption for 21/22 has been increased from 2% to 3%, later years have remained at 2%.
- A provision has been included for the additional cost of legal services.
- The waste savings previously assumed from joint working have been removed.
- Additional resource has been included to help deliver the environmental strategy.
- An estimate of the income compensation grant has been made.
- Additional Covid 19 spending pressures have been included.

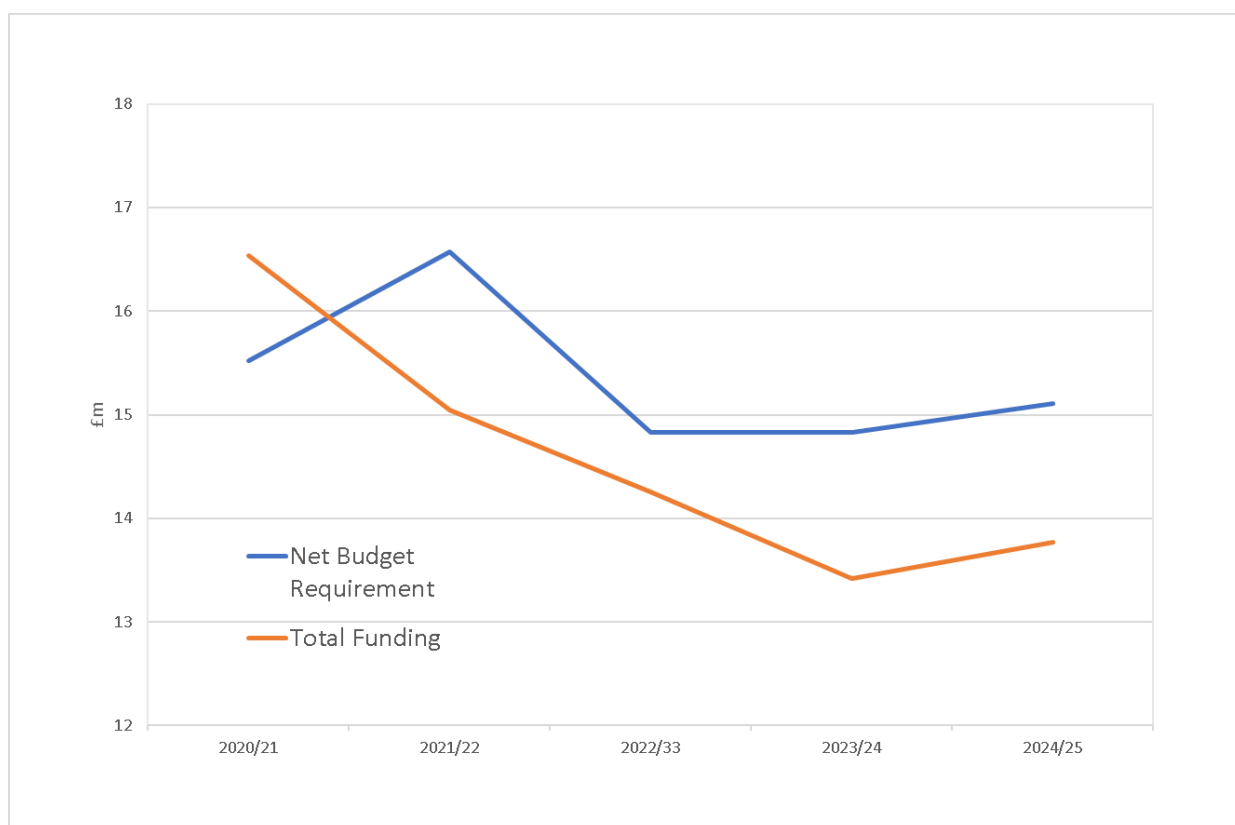
Impacts on Funding

- It has been assumed that some additional income will be received from New Home Bonus or its replacement.

- 6.5 Further details are shown in the Appendix.

- 6.6 The updated MTFS now shows that the funding gap of £0.7m in 2020/21, is now expected to be a funding surplus of £1.016m (primarily due to the new income compensation grant). However, the future funding gap has remained at a similar level.

	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000
Net Budget Requirement	15,525	16,574	14,829	14,826	15,110
Total Funding	16,534	15,047	14,252	13,423	13,770
Funding Gap / (Annual Surplus)	-1,009	1,527	577	1,403	1,340



6.7 The following table shows how the funding gap has changed.

	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000
Original Funding Gap / (Annual Surplus) - June	703	1,722	768	1,490	1,313
<u>Impacts on Net Budget Requirement</u>					
Increase in inflation assumption		144	148	152	166
Increased cost of legal services		117	117	117	117
Removal of savings from joint waste				100	200
Resource to deliver environmental strategy	11	44	44	44	44
Income Compensation grant from Gov	-1,778				
COVID 19 - Spending Pressures	55				
<u>Impacts on Funding</u>					
New 'New Homes Bonus' scheme		-500	-500	-500	-500
New Funding Gap / (Annual Surplus)	-1,009	1,527	577	1,403	1,340

7 OTHER OPTIONS

7.1 Members have discretion to agree the requested budget changes, or propose alternatives.

8 ISSUES AND RISKS

- 8.1 Resource Implications – This paper provides an update on the medium term financial position.
- 8.2 The Council currently has £11.9m in the General Fund Balance / General Fund Reserve and £12.1m in earmarked reserves.
- 8.3 The Council also has limited capital reserves (£3.5m). In general capital reserves can only be used to fund capital expenditure and are not permitted to be used to fund revenue deficits.
- 8.4 The key risks are:
- There could be a second wave of Covid 19 infections, which could require a second full lockdown incurring further costs and income losses to the Council.
 - Until the Provisional Finance Settlement is issued in December 2020, there is material uncertainty over the future funding position.
- 8.5 Legal Implications – The Council has a legal duty to ensure its financial position remains robust.

9 RECOMMENDATIONS

Cabinet to recommend to Council the following:

1. To increase the SNC 20/21 IT Capital Budget by £141,000, to fund the rollout of additional laptops to better facilitate the new ways of working:
2. To increase the SNC annual Revenue Budget by £44,000 (with a pro-rata adjustment for 20/21 as only a part year effect) to fund an additional resource to help implement the actions set out in the recently agreed Environmental Strategy.
3. To agree that the unspent 'joint waste budget' can be applied to cover the costs of developing a full business case for a LATC and depot projects.
4. To increase the budgetary provision for Covid 19 expenditure from £250,000 to £305,000 to cover the additional £55,000 regulatory expenditure.
5. To reduce the budgetary provision for Covid 19 direct hardship payments by £68,000 and return the money to the main Council Tax Support hardship allocation.
6. To agree the proposed changes to the 20/21 income budgets as set out in paragraph 4.17.
7. To agree that the Assistant Director Regulatory is authorised to spend the new Coronavirus Enforcement grant of £57,176, to help the public and businesses understand the latest Covid 19 regulation, and increase compliance work and enforcement checks on businesses.

8. To remove the post of Assistant Director Consultancy Team from the establishment.

Cabinet to note the updated Medium Term Financial Strategy.

Cabinet to agree that approval of criteria for the distribution of discretionary local lockdown grants be delegated to the Assistant Director Economic Growth in consultation with the Portfolio Holder for Economic Development

Background Papers

None

Appendix

	2020/21 £000	2021/22 £000	2022/23 £000	2023/24 £000	2024/25 £000	Comment
Base Net Expenditure	13,755	13,961	14,230	14,020	14,217	
<u>Recurring Adjustments:</u>						
Inflationary Pressures		419	285	280	284	3% 21/22 then 2% annual increase
Collaboration Savings		-495	-495	-83		Based on 55% of latest figure from cost and savings tracker
Increased cost of legal services		117				No allowance for expansion of service, or increased disposal costs
Waste arrangements - Now removed						
Resource to deliver environmental strategy	11	33				
Recycling Gate Fee	195	195				£30 per tonne extra x 13,000 tonnes. Half year effect 20/21.
Base Net Expenditure for following year	13,961	14,230	14,020	14,217	14,501	
<u>Lost income</u>						
- Leisure	2,247	843				4 mth full shut down, then 50% for rest of year
- Planning	328					25% reduction in 20/21, then bounce back
- Building Control	126					Nb: This is the shared service
- Car Parking	178					50% reduction in 20/21, then bounce back
- Waste Charges	13					25% reduction in 20/21, then bounce back
- Commercial Income	100					£100k loss
- Land charges	83					25% reduction in 20/21, then bounce back
- Recovery of overpaid HB	100					25% reduction in 20/21, then bounce back
- Pest Control	15					25% reduction in 20/21, then bounce back
- Council Tax Summons Costs	43					25% reduction in 20/21, then bounce back
- Other income						No change proposed
Income Compensation grant from Government	-1,778					
<u>Non Recurring Adjustments</u>						
COVID 19 - Spending Pressures	500					One off cost 20/21.
COVID 19 - Spending Pressures	55					Regulatory costs
Investing in the Public Realm	100					One off cost 20/21.
Additional Council Tax Support	256	192				20/21 50% increase. 21/22 reducing to 25%. Then back to current levels.
Measures to reduce in year spend	-433					eg freezing vacant posts, training, travel
COVID 19 - Government Funding	-1,465					One off income 20/21.
Investment Income - General	-41	-41	-41	-41	-41	Assume remains stable over time
Investment Income - Loans to companies	-1,500	-1,400	-900	-600	-600	Income from Big Sky (See Note)
Interest Payable	192	750	750	750	750	External borrowing interest (based on capital £25m x 3%)
Transfers to / (from) Earmarked Reserves	2,445	2,000	1,000	500	500	Reducing
Net Budget Requirement	15,525	16,574	14,829	14,826	15,110	
Funded by						
Council Tax - District Element	7,745	8,075	8,410	8,752	9,099	
Reduction in Council Tax Collection Rates	-154	-77				20/21 2% cut. 21/22 1% cut. Then back to current levels.
Council Tax - Special Expenses	11	11	11	11	11	Assume remains stable over time
NNDR (Business Rates)	4,410	4,160	4,160	4,160	4,160	Amount of funding from growth likely to be scaled back in future.
New Homes Bonus	4,522	2,878	1,671	500	500	Falling in line with figures in 20/21 provisional finance settlement
Total Funding	16,534	15,047	14,252	13,423	13,770	
Funding Gap / (Annual Suplus)	-1,009	1,527	577	1,403	1,340	
Council Tax Calculation						
Council Taxbase (Homes)	49,966	50,466	50,971	51,481	51,996	1% annual increase
Council Tax	155.00	160.00	165.00	170.00	175.00	£5 annual increase
South Norfolk's share of precept (£000)	7,745	8,075	8,410	8,752	9,099	
New Homes Bonus Calculation						
2017-18	763					
2018-19	1,207	1,207				
2019-20	1,171	1,171	1,171			
2020-21	1,381					
New incentive scheme		500	500	500	500	
	4,522	2,878	1,671	500	500	

REVIEW OF EARMARKED RESERVES

Report Author(s):	Madeleine Bussens Senior Finance Business Partner mbussens@s-norfolk.gov.uk
Portfolio:	Finance & Resources
Ward(s) Affected:	All
Purpose of the Report:	To review the Council's Earmarked Reserves.

Recommendations:

Cabinet to recommend to Council to agree the following changes to the Council's Reserves:

1. The closure of the following reserves:
 - a. Localisation of Council Tax Benefit
 - b. Low Cost Housing (New Homes Bonus)
 - c. Communities and Localism
2. The reduction in the Localisation of Business Rates Reserve by £3,169,000.
3. The merger of the following two reserves:
 - a. Non-Commercial Assets Replacement Reserve
 - b. Vehicle and Equipment Procurement and Replacement Reserve
4. The creation of the following reserves:
 - a. Depot works - £5m.
 - b. New Ways of Working - £4m.
 - c. Leisure Centre - £2m.

1 GENERAL FUND RESERVE

- 1.1 The General Fund Balance / General Fund Reserve is the main unallocated reserve held by the Council. The balance on the General Fund Balance / General Fund Reserve as at 31 March 2020 was £11.891m. The current recommended minimum level of the General Fund Reserve, set by the Council's s151 officer, is £1.4m.

2 EARMARKED RESERVES

2.1 Earmarked Reserves are amounts that have been set aside to provide financing for specific future events.

2.2 The following table shows the breakdown of the Council's Earmarked Reserves as at 31 March 2020. These total £12.111m.

Reserve	Usage	Balance 31 Mar 2020 £'000
Infrastructure Reserve	To support the Council taking forward local infrastructure schemes and to foster economic development in the District.	2,837
Non-Commercial Assets Replacement Reserve	To replace assets that do not directly generate income to the Council.	551
Street Lighting Replacement Reserve	To fund retained street lights in Loddon, Gillingham & Costessey	5
Localisation of Business Rates Reserve	To minimise in-year risk of volatility of income under the localisation of Business Rates.	5,169
Localisation of Council Tax Benefit	To absorb any large increase in the level of Council Tax Support provided to residents.	500
District and Parish Elections	To even out costs of elections held every four years and unforeseeable by-elections. It is built up over the four year period and used to fund costs in election years.	65
Local Development Reserve	To finance exceptional and unplanned costs in delivering the Local Development Framework eg. appeals, development to the Local Plan.	855
Vehicle and Equipment Procurement and Replacement Reserve	To finance the purchase of new and replacement vehicles and equipment in line with the Council's capital programme.	754
Low Cost Housing (New Homes Bonus)	Originally funded from New Homes Bonus affordable premium, this reserve sets funds aside to cover expenditure on housing projects.	876
Car Park Upgrades Reserve	To manage the timing issues associated with car park upgrades eg. resurfacing in order to keep them in good condition and up to date.	127
Enterprise Zone Reserve	To manage the flows of income and expenditure and their variable timings in order to manage the funding to be reinvested into the Norwich Research Park Enterprise Zone. To finance the loan to enable to infrastructure to be brought forward.	150
3G Pitch Renewal Reserve	To create a fund to refurbish the 3G pitch at Long Stratton, estimated for 2026.	41
Communities and Localism Reserve	To establish a funding source for expenditure by Neighbourhood Boards.	181
Total		12,111

3 PROPOSALS

Suggested Closures

3.1 It is proposed that:

- The [Localisation of Council Tax Benefit](#) Reserve is closed. This reserve was set up a number of years ago to provide a smoothing mechanism if demand for Council Tax Benefit varied significantly. This has not been needed and thus the reserve can be closed.
- The [Low Cost Housing](#) Reserve to be closed. This reserve retained the affordable premium from the New Homes Bonus and in 20/21 it will be used to fund part of the Big Sky Property Management expenditure and then can be closed.
- The [Communities and Localism](#) Reserve is closed. This originally came from the Market Towns Initiative surpluses and was for spend directed by Neighbourhood Boards. This is no longer required.

Suggested Reductions

3.2 It is proposed that:

- The [Localisation of Business Rates](#) Reserve is reduced by £3,169,000. The Council has consistently seen growth in business rates, and has therefore not need to draw on this reserve. However, Covid 19 has increased the risk of a downturn in business rates income. In addition, there is still an ongoing appeal by NHS bodies regarding their liability for business rates. If successful, this reserve would be used to cover the loss of Income.

Suggested Mergers

3.3 It is proposed that:

- The [Non-Commercial Assets Replacement](#) Reserve and The [Vehicle and Equipment Procurement and Replacement](#) Reserve to be merged into one reserve. This new reserve is to be renamed to Asset Replacement Reserve.

New Reserves

3.4 It is proposed that three new reserves are created as follows:

- A Depot Works Reserve of £5m is created. This would be to help fund improvements to the depot or relocation to a new site.
- A New Ways of Working Reserve of £4m is created. This would be to fund any accommodation / IT improvements arising from the New Ways of Working Project.
- A Leisure Centre Reserve of £2m is created. This would help to fund any refurbishments or replacements of current kit.

Covid 19

- 3.5 If there is a second wave of Covid 19, the Council is likely to incur additional costs. To date, central Government has provided funding towards any additional costs associated with the pandemic, but this is by no means guaranteed going forward.
- 3.6 It would therefore be a valid option to set aside money in an Earmarked Reserve as a contingency for any additional Covid costs. However, the alternative way of dealing with this uncertainty is to ensure that the minimum level on the General Fund Balance is increased to provide an additional contingency. The s151 officer is therefore advising that the minimum level on the General Fund Reserve needs to increase in the short term from £1.4m to £2.4m.

Summary of Changes

- 3.7 The following table summarises the proposed changes.

Reserve	Balance 31 March 2020 £'000	Suggested Closures / Reductions £'000	Suggested Mergers £'000	New Reserves £'000	New Balance £'000
Infrastructure Reserve	2,837				2837
Non-Commercial Assets Replacement Reserve	551		-551		0
Street Lighting Replacement Reserve	5				5
Localisation of Business Rates Reserve	5,169	-3,169			2,000
Localisation of Council Tax Benefit	500	-500			0
District and Parish Elections	65				65
Local Development Reserve	855				855
Vehicle and Equipment Procurement and Replacement Reserve	754		-754		0
Low Cost Housing (New Homes Bonus)	876	-876			0
Car Park Upgrades Reserve	127				127
Enterprise Zone Reserve	150				150
3G Pitch Renewal Reserve	41				41
Communities and Localism Reserve	181	-181			0
Depot works				5,000	5,000
New ways of working				4,000	4,000
Asset Replacement Reserve			1,305		1,305
Leisure Centre				2,000	2,000
Total Earmarked Reserves	12,111	-4,726	0	11,000	18,385
General Fund Balance / General Fund Reserve	11,891	4,726	0	-11,000	5,617

4 OTHER OPTIONS

- 4.1 Members have discretion to earmark reserves for any legitimate purpose. Members are therefore able to accept or reject the above proposals and / or propose other changes.

5 ISSUES AND RISKS

5.1 Resource Implications

The creation of the new Earmarked Reserves will reduce the General Fund Reserve to £5.617m. This is still significantly above the minimum recommended level of £2.4m.

5.2 Legal Implications

None

5.3 Equality Implications

None

5.4 Environmental Impact

There may a positive environmental impact as a result of improving the Refuse Depot and / or the Accommodation.

5.5 Crime and Disorder

None

5.6 Risks

None not mentioned elsewhere in this report.

6 RECOMMENDATION

- 6.1 Cabinet to agree the following changes to the Council's Reserves:

1. The closure of the following reserves:
 - a. Localisation of Council Tax Benefit
 - b. Low Cost Housing (New Homes Bonus)
 - c. Communities and Localism
2. The reduction in the Localisation of Business Rates Reserve by £3,169,000.
3. The merger of the following two reserves:
 - a. Non-Commercial Assets Replacement Reserve
 - b. Vehicle and Equipment Procurement and Replacement Reserve
4. The creation of the following Reserves:
 - a. Depot works - £5m.
 - b. New Ways of Working - £4m.
 - c. Leisure Centre - £2m.

Background Papers

None

Treasury Management Quarter 2 Report 2020/21

Report Author(s): Darren Slowther
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Portfolio: Finance & Resources

Ward(s) Affected: All

Purpose of the Report:

This report reviews the treasury management activity during the first six months of the financial year 2020/21 and reports on the prudential indicators.

Recommendations:

Cabinet is recommended to request that Council:

1. Note the treasury activity for the first half of the year and that it complies with the agreed strategy.
2. Note the 2020/21 prudential indicators for the first six months of the year.

1 SUMMARY

- 1.1 Investments totalled £61.427m as at 30 September 2020, including loans and equity in the Council's wholly owned companies of £28,653m.
- 1.2 Interest received on external cash investments during the financial year is forecast to be around £62,000 which is £27,000 above the budget of £35,000. However uncertainty around Brexit and the ongoing impact of Covid-19 on the performance of the Council's externally managed funds will influence the final year end figure.
- 1.3 There has been no need to externally borrow so far this financial year.
- 1.4 There have been no breaches of the Council's Prudential Indicators. However the Council have exceeded their counterparty limit for Barclays PLC (£12.5m as per the 20/21 Investment Strategy) as a result of the ongoing Covid-19 pandemic.

2. INVESTMENT ACTIVITY

- 2.1 The graph below shows the position on investments as at 30 September 2020 compared to the position over the past 2 years. Short term investment balances have decreased and cash placed in Money Market Funds (MMF'S) has increased by necessity to ensure increased liquidity as a result of the Covid 19 pandemic.
- 2.2 With regard to long term investments, the Council has continued to use its cash to invest in property and commercial activities via its wholly owned companies. A loan of £5m was made to Big Sky Developments Ltd during the first quarter of 2020/21.

Investments at End of Month	Interest Rate	End Apr £'000	End May £'000	End Jun £'000	End Jul £'000	End Aug £'000	End Sep £'000
SNC							
Instant Access							
Barclays		15.1	12.1	10.7	7.6	10.5	5.7
HSBC		2.5	2.5	2.5	2.5	2.5	
Money Market Funds (MMFs)							
Aberdeen			5.0	7.0	7.0	7.0	7.0
Federated		7.0	7.0	7.0	7.0	7.0	7.0
Invesco				6.0	6.0	6.0	6.0
CCLA					7.0	7.0	7.0
Longer Term Investments							
Central Bedfordshire Council fixed 06/05/20	0.95%	3.0					
Nottingham City Council fixed 13/05/20	0.10%	2.0					
Lloyds 95 Day Notice Accounts - Returned 20th June	0.45%	7.0	7.0				
Goldman Sachs fixed 06/07/20	0.98%	3.0	3.0	3.0			
Total		39.6	36.6	36.2	37.1	40.0	32.7

- 2.3 The Council holds £25,000 in shares in the Municipal Bonds Agency. This is an equity investment and was accounted for as capital expenditure.

- 2.4 The Council has invested in its companies. As at 30 September 2020, this consisted of £6,468,000 of equity shares in Big Sky Ventures Limited, the holding company for the Council's property companies.

INVESTMENTS MADE DURING APR - SEPT

- 2.5 There have been no new investments so far this year, however, the Council has made use of Enhanced Money Market Funds that have been able to provide slightly higher returns than call accounts.

INCOME FROM INVESTMENTS

- 2.6 The Council's budgeted investment income for the year had been set at £35,000. The cash balances invested, representing the Council's reserves and working balances were £32,775 million as at 30 September 2020 and interest earned is forecast to be £62,000 which is £27,000 above budget (this could be subject to interest rate changes as a result of Brexit and the ongoing effects of Covid 19). The forecast interest is £233,000 less than the £295,000 received in 2019/20.
- 2.7 As per the agreed capital programme, there were outstanding loans as at 30 September 2020 of £3,160,000 to Big Sky Property Management Ltd, to enable it to purchase rental property from Big Sky Developments Limited (BSD) and other sellers within the district. It now holds 27 properties in its portfolio of which 21 were purchased from BSD. Interest rates on these loans are applied at a commercial rate of 4%, reflecting the relative risk in the company and the market environment.
- 2.8 The Council also had outstanding loans of £19,000,000 as at 30 September to Big Sky Developments Ltd (BSD), at a commercial interest rate of 6%, which have been granted to finance the St Giles Park development at Cringleford. These are backed by Homes England funding from the £7.8m construction fund which is passed to the Council in arrears after development expenditure has been incurred on the site.

INVESTMENT PROPERTIES

- 2.9 The Council has a commercial rental portfolio worth around £7.0 million. The majority of these properties are rented out, so the return obtained on these properties is as important as if the Council had invested the same amount in the Treasury Strategy. However, under CIPFA's code they are recognised as Capital Assets in the Balance Sheet.
- 2.10 The average rate of return for the total investment portfolio at Q2 is 6.4% gross, calculated on the property value as at 1 April 2020. This is a significantly better rate of return than if the same value had been invested with financial institutions.

3. BORROWING ACTIVITY

- 3.1 The Council's underlying need to borrow is called the Capital Financing Requirement (CFR). There has been no need to externally borrow so far this year. The Council's CFR is shown below and represents a key prudential indicator.

CFR (£m)	31 March 2020 Actual	31 March 2021 Estimate
Closing Balance	£3,000,000	£25,602,000

- 3.2 The Council's Treasury Management Strategy agreed by Full Council on 3 February 2020 states that the CFR would be financed from internal borrowing in the first instance and then external borrowing. Whether external borrowing is ultimately required in 2020/21 will depend on the extent of net cash flows into the authority and the speed at which the Council's capital programme is delivered.

4. COMPLIANCE WITH PRUDENTIAL INDICATORS

- 4.1 The Council approved a set of Prudential Indicators for 2020/21, in February 2020, as part of the Council's Treasury Management Strategy.
- 4.2 The authority's Treasury Management Strategy for 2020/21 followed the principles in MHCLG's 2010 'Guidance on Local Government Investments' ("Guidance") and CIPFA's 'Treasury Management Code of Practice 2017 (TM Code)". Security and liquidity of investments take priority over yield and surplus funds have been invested in high credit quality counterparties. No counterparty in which the Council has invested funds had a credit rating lower than A- as stated in the Council's Annual Investment Strategy 2020/21.
- 4.3 Under the Council's Constitution, the Full Council approves the Treasury Management Strategy and therefore any deviation or breach must be reported to Full Council. In practice, all breaches are also reported to Cabinet prior to Full Council. The prudential indicators can be found in Appendix A. There were no breaches of the indicators between April and September.
- 4.4 However the Council have exceeded their counterparty limit for Barclays PLC (£12.5m as per the 20/21 Investment Strategy) as a result of the Covid-19 pandemic. The Council received grant payments in excess of £30m during April and May to be distributed as various forms of relief to residents and businesses in the district. As timings of these cash flows was hard to estimate and likely to be erratic, a larger volume of liquid cash was retained by the authority. Additionally there were, and continue to be, ongoing concerns over the potential loss of income to the authority from Council Tax, Business Rates and service related activities.

5 ECONOMIC ENVIRONMENT & INTEREST RATES

- 5.1 As expected, the Bank of England's Monetary Policy Committee kept Bank Rate unchanged on 6th August at 0.1%. It also kept unchanged the level of quantitative easing at £745bn.

The fall in GDP in the first half of 2020 was revised from 28% to 23%. This is still one of the largest falls in output of any developed nation. However, it is only to be expected as the UK economy is heavily skewed towards consumer-facing services – an area which was particularly vulnerable to being damaged by lockdown.

The peak in the unemployment rate was revised down from 9% in Q2 to 7½% by Q4 2020.

It forecast that there would be excess demand in the economy by Q3 2022 causing CPI inflation to rise above the 2% target in Q3 2022, (based on market interest rate expectations for a further loosening in policy). Nevertheless, even if the Bank were to leave policy unchanged, inflation was still projected to be above 2% in 2023.

- 5.2 It also squashed any idea of using negative interest rates, at least in the next six months or so. It suggested that while negative rates can work in some circumstances, it would be “less effective as a tool to stimulate the economy” at this time when banks are worried about future loan losses. It also has “other instruments available”, including QE and the use of forward guidance.
- 5.3 The MPC still expects the £300bn of quantitative easing purchases announced between its March and June meetings to continue until the “turn of the year”. This implies that the pace of purchases will slow further to about £4bn a week, down from £14bn a week at the height of the crisis and £7bn more recently.
- 5.4 the MPC acknowledged that the “medium-term projections were a less informative guide than usual” and the minutes had multiple references to downside risks, which were judged to persist both in the short and medium term. One has only to look at the potential for a second wave of the virus to see the dangers. However, rather than a national lockdown, as in March, any spikes in virus infections are now likely to be dealt with by localised measures and this should limit the amount of economic damage caused. In addition, Brexit uncertainties ahead of the year-end deadline are likely to be a drag on recovery. Overall, the pace of recovery is not expected to be in the form of a rapid V shape, but a more elongated and prolonged one.
- 5.5 Overall, it is expected that there has been a strong pickup in economic growth during the back-end of quarter 2 of 2020. However, that pace is likely to fade as the furlough scheme ending in October will lead to many job losses during the second half of the year. Consumers will also probably remain cautious in spending and this will dampen growth. Uncertainty over the outcome of the UK/EU trade negotiations concluding at the end of the year will also be a headwind.
- 5.6 The latest interest rate forecasts from the Council's Treasury Management Advisors, are shown in the table below. The coronavirus outbreak has done significant economic damage to the UK and around the world. The Bank of England took emergency action in March to cut Bank Rate to first 0.25%, and then

to 0.10%. However, the Governor of the Bank of England has made it clear that he currently thinks a move to negative rates would do more damage than good and that more quantitative easing is the favoured tool if further action becomes necessary. As shown in the forecast table below, no increase in Bank Rate is expected within the forecast horizon ending on 31st March 2023 as economic recovery is expected to be only gradual and, therefore, prolonged.

Link Group Interest Rate View 11.8.20											
	Sep-20	Dec-20	Mar-21	Jun-21	Sep-21	Dec-21	Mar-22	Jun-22	Sep-22	Dec-22	Mar-23
Bank Rate View	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10	0.10
3 month average earnings	0.05	0.05	0.05	0.05	0.05	0.05	-	-	-	-	-
6 month average earnings	0.10	0.10	0.10	0.10	0.10	0.10	-	-	-	-	-
12 month average earnings	0.15	0.15	0.15	0.15	0.15	0.15	-	-	-	-	-
5yr PWLB Rate	1.90	1.90	2.00	2.00	2.00	2.00	2.00	2.10	2.10	2.10	2.10
10yr PWLB Rate	2.10	2.10	2.10	2.10	2.10	2.20	2.20	2.20	2.30	2.30	2.30
25yr PWLB Rate	2.50	2.50	2.50	2.50	2.60	2.60	2.60	2.70	2.70	2.70	2.70
50yr PWLB Rate	2.30	2.30	2.30	2.30	2.40	2.40	2.40	2.50	2.50	2.50	2.50

6 ISSUES AND RISKS

- 6.1 All investments were made within the statutory requirements that govern local authority money market activities.
- 6.2 The CIPFA Code of Practice on Treasury Management requires the authority to report on treasury management activities at least twice a year, including a report on the Prudential Indicators
- 6.3 The main aim of the investment strategy is to minimise the risk of loss of principal. The Council's investments are with counterparties offering higher security, at the expense of yield if necessary. The Council works with its financial advisors to ensure that risks are reduced.
- 6.4 The report has no specific impact on Equalities. Treasury decisions are made primarily on the basis of the security of counterparties, with the needs of the authority's cash-flow second and other considerations such as equality and diversity given lower priority.

7 RECOMMENDATIONS

- 7.1 Cabinet is recommended to request that Council:
 - a) Note the treasury activity for the first half of the year and that it complies with the agreed strategy.
 - b) Note the 2020/21 prudential indicators for the first six months of the year.

Appendix A: Prudential Indicators

Capital Financing Requirement and Borrowing

Estimates of the Council's Capital Financing Requirement for 2019/20 to 2021/22 are shown in the table below:

	31/03/2020	31/03/2021	31/03/2022
	Outturn	Estimate	Estimate
	£000s	£000s	£000s
Capital Financing Requirement before MRP	3,000	25,602	9,293
Less Minimum Revenue Provision	0	0	0
Capital Financing Requirement	3,000	25,602	9,293

The table below shows the maximum borrowing planned, which is both internal borrowing from cash balances and external borrowing from funders such as PWLB.

	31/03/2020	31/03/2021	31/03/2022
	Outturn	Estimate	Estimate
	£000s	£000s	£000s
Existing Profile of Borrowing	0	0	19,000
Less: Other Long Term Liabilities	0	0	0
Borrowing in Year	0	19,000	28,000
Cumulative Maximum Borrowing Requirement	0	19,000	47,000

Balances and Reserves

Estimates of the Council's level of Balances and Reserves (both Revenue and Capital) for 2019/20 and future years are as follows:

	31/03/2020	31/03/2021	31/03/2022
	Actual	Estimate	Estimate
	£000s	£000s	£000s
Balances and Usable Reserves	22,601	21,269	20,804

These have risen from the estimates in the Treasury Management Strategy due to lower than anticipated capital expenditure during this financial year.

Prudential Indicator Compliance

(a) Authorised Limit and Operational Boundary for External Debt

- The Local Government Act 2003 requires the Council to set an Affordable Borrowing Limit, irrespective of their indebted status. This is a statutory limit which should not be breached.
- There was no external borrowing in 2020/21 to date and therefore the limits set for 2020/21 were not breached.

(b) Interest Rate Exposure

- The Council has managed the extent to which it is exposed to changes in interest rates. It has done this during the year to date by making a combination of fixed and variable rate investments.
-

(c) Maturity Structure of Borrowing

This indicator sets upper and lower limits for the proportion of borrowing at both fixed and variable rates that is repayable within defined timescales (maturity is defined as the earliest date at which the loan could be required to be repaid).

Maturity Structure of Borrowing	Lower Limit (Cumulative) %	Upper Limit (Cumulative) %	Actual Borrowing as at 30/09/20	% Borrowing as at 30/09/20	Compliance with Set Limits?
Under 12 months	0	20	0	0	Yes
12 months to 2 years	0	80	0	0	Yes
2 years to 5 years	0	90	0	0	Yes
5 years to 10 years	0	95	0	0	Yes
10 years and above	0	100	0	0	Yes

(d) Total principal sums invested for periods longer than 364 days

- This indicator allows the Council to manage the risk inherent in investments longer than 364 days.
- The limit for 2019/20 is set at £15 million.

Strategic Performance, Risk and Finance Report for Quarters 1 and 2 2020/21

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Portfolio:

Governance and Efficiency
Finance & Resources

Ward(s) Affected:

All

Purpose of the Report:

The purpose of the Strategic Performance, Risk and Finance Report is to provide a summarised overview of the performance of the Council against the key outcomes set out in the Delivery Plan for 2020/21. This Quarterly Report covers Quarters 1 and 2, the period from April to September 2020.

Recommendations:

Cabinet to:

1. Note the revenue and capital position (variance details in Appendix 1)
2. Note the current position with respect to risks and agree the actions to support risk mitigation (detailed in Appendix 2).
3. Note the 2020/21 performance for Q1 and Q2 (detail in Appendix 3).

1 SUMMARY

- 1.1 This report provides a summarised overview of the performance of the Council and is aligned to the key outcomes set out in the Delivery Plan for 2020/21. This Quarterly Report covers Quarters 1 and 2, the period from April to September 2020.

2 BACKGROUND

- 2.1 The Council agreed in March 2020 to move forward with implementing the four-year Strategic Plan which sets out the vision and ambitions of the Council. Alongside this, the Council developed an in-year Delivery Plan for 2020/21, which has recently been updated to reflect the ongoing impacts of the Covid-19 pandemic.

- 2.2 At the heart of the Strategic Plan 2020-2024, is the vision for our place:

‘Working together to create the best place for everyone, now and for future generations’

- 2.3 This vision is underpinned by the Council’s strategic priorities:

- Growing the Economy
- Supporting individuals and empowering communities
- Protecting and improving the natural and built environment, whilst maximising quality of life
- Moving with the times, working smartly and collaboratively

- 2.4 The Delivery Plan sets out the key activities to be delivered within the first year of the Strategic Plan, broken down into service delivery and major projects/programmes of work. There is clear linkage between our vision and aspirations, detailed in the Strategic Plan, our Priorities and Projects and the Strategic Performance, Risk and Finance Reports. To enable success of the activities to be monitored, the Delivery Plan provides several Delivery Measures which are reported into Cabinet in Q2, Q3 and Q4.

- 2.5 The report summaries the Council’s performance, risk and finance position for Q1 and Q2, with detailed overview provided in the appendices to the report as set out below:

- Appendix 1 – Finance
- Appendix 2 – Strategic Risk Register
- Appendix 3 – Delivery Measure Performance

3 CURRENT POSITION/FINDINGS

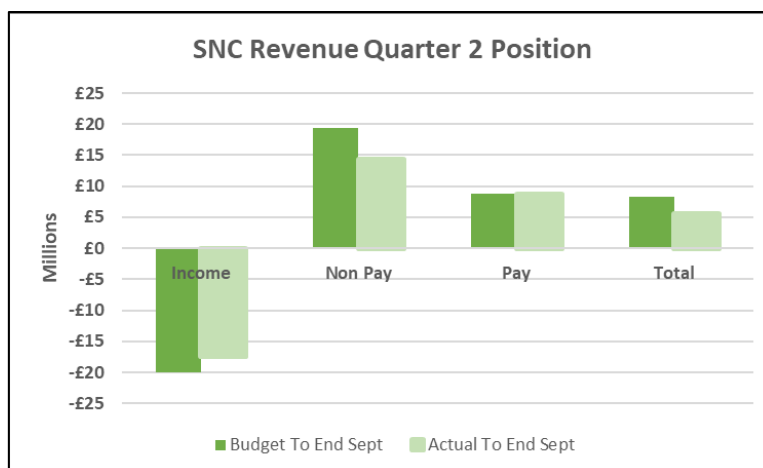
- 3.1 The below dashboard provides a summary for Q1 and Q2 finance, performance and risk data.

Finance Dashboard Overview

- 3.2 The following table provides a summary of the revenue budget position as at end of September 2020:

SNC	Annual Budget £'000	Budget to date £'000	Actual to date £'000	Variance £'000
Resources	7,122	3,397	1,840	1,557
Place	1,846	838	595	243
People & Communities	6,784	3,497	2,611	886
Managing Director	1,164	580	572	8
Total – variance (favourable)	16,916	8,312	5,618	2,694

- 3.3 The year to date results show a favourable variance of £2.7m. Reasons for the variations are chiefly
- Resources - £1.6m including Covid-19 funding unspent £1.1m, Governance recruitment and training underspend
 - People and Communities - £0.9m including Recycling £0.2m favourable due to extra volumes and other savings within Operational services, Leisure £0.2m favourable due to lower running costs against budget
 - Place - £0.2m Economic Growth spend lower than budgeted to date
- 3.4 A more detailed analysis of the main areas of variance by service is attached in Appendix 1.
- 3.5 The quarter 2 Revenue Position is set out in the graph below:



- 3.6 **Pay and staffing budgets:** The Council has continued to realise savings as a result of restructuring roles through the One Team programme. Since Jan 20 salary costs of joint teams have been shared 55%/45%. The overall effect on staffing budgets is a positive variance of £0.1m.
- 3.7 **Non-Pay budgets:** There has been lower than budgeted non-pay expenditure, driven by lower than budgeted Housing Benefit Grant expenditure of £3.2m. There is also an additional £1.4m across all other directorates where expenditure is lower than budgeted in the period. Due to priority projects and New Ways of Working there is £0.5m underspend in several areas, resulting in a total positive variance of £5.1m in non-pay cost.
- 3.8 **Income budgets:** There was an adverse variance of £2.6m against budget, largely explained by the £3.2m shortfall to budget in money received for Housing Benefits and £0.3m in Economic Growth for NRP funding budgeted but not received to date. These shortfalls are being offset by £1.0m Income received for COVID which was not budgeted.

Capital Position

- 3.9 The following table provides details of capital spend as at end of Q2:

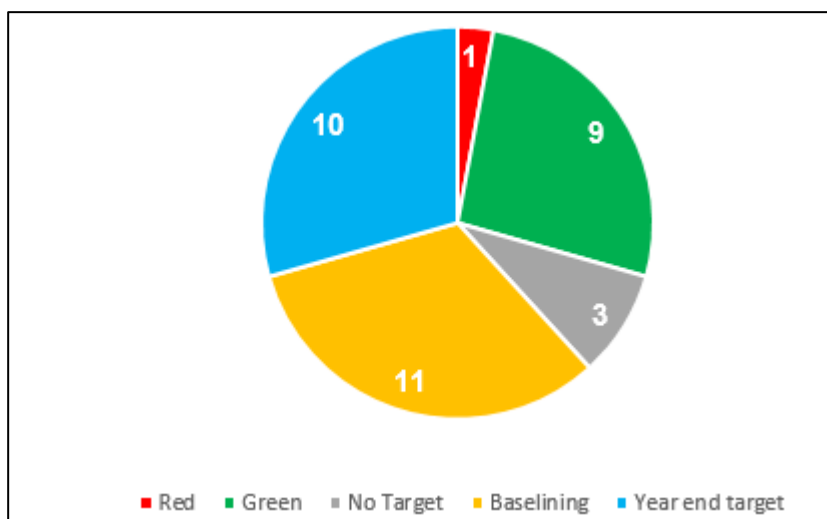
Scheme	Whole Year Budget including slippage	Budget to Date	Actual to Date	Variance to Date	Comment
	£000	£000	£000	£000	
Approved Schemes					
Disabled Facilities Grants	905	453	192	261	Spend being impacted by COVID - situation to be monitored to ensure Better Care Funding is fully committed.
Improved Leisure Provision	518	340	357	-17	The Car Park extension at Wymondham Leisure Centre is now complete, but came in over budget by £30,000. Diss Changing rooms were completed by early September for opening on 14th Sept with payment to be finalised during Oct. The project to replace the pool filters at Wymondham Leisure Centre is mostly complete.

Depot Projects including Vehicle Replacement	1,337	669	317	352	Bin lift refurbishments are now complete. We took delivery of one large vehicle in Sept and another one is expected in Oct. The Waste Route Optimisation System project is currently on hold.
Integrated Working Model with Police	63	-	-	-	Project is awaiting Director approval
IT Projects	1,279	640	30	609	Vast majority of budget relates to the new infrastructure project and the award of the contract is not expected to be agreed until Q4
Investment Property - Cringleford	3,000	3,000	3,000	-	Loan to BSD granted in May - No further expenditure expected.
BSD - Homes England Funding	5,440	5,440	5,440	-	These loans have been financed by Homes England Grant funding.
BSPM Rental Home Purchases on new sites	550	-	-	-	No new homes available for purchase at present
Norwich Research Park Enterprise Zone Office	4,354	650	629	21	Building currently under construction and expected to be complete in Q4 with fit-out to follow.
Norwich Research Park Enterprise Zone Infrastructure	2,100	1,050	638	412	Project on track. The Rosalind Franklin Road is now predominantly complete and the roundabout is on track to be delivered in Q4. Variance is due to timing difference between payments and budget.
Toilet Refurbishments	210	105	14	90	Refurbishment works at LS & Diss are currently underway and are expected to be complete by the end of Q3.
Street Lighting	103	33	32	1	Payment to Loddon PC has now been made. A decision is to be made later in the year regarding the replacement

					programme for street lights going forward.
Play Area Refurbishments Equipment	72	36	11	25	The play area at Abbey Rd, Wymondham is now complete. Further equipment for other sites is due to installed imminently. Budget expected to be spent by year end.
Car Park Improvements	63	32	-	32	Resurfacing will only be undertaken when required.
Total Approved Schemes	19,995	12,446	10,660	1,787	
Provisional Schemes					
BSD Financing	10,000	1,560	1,560	-	£1.56m loan advanced to Big Sky Development to finance 5 year strategy.
Strategic Economic Development (Browick)	8,750	-	-	-	
Total Provisional Schemes	18,750	1,560	1,560	-	
TOTAL	38,745	14,006	12,220	1,787	

Performance Dashboard Overview

3.10 **Delivery Measure Status against targets:** The following chart shows the number of Delivery Measures with the associated RAG Status (where applicable). More detail is outlined in Appendix 3.



- 3.11 As part of the new Delivery Measure design, not all measures were given a specific 'target' to meet over each quarter. Where 'targets' have been provided, a Red, Amber or Green (RAG) status has been used. A RAG status signifies whether or not progress is on track. In deciding RAG ratings, we consider data on current performance and an assessment of progress.

Strategic Risk Dashboard

- 3.12 **Strategic Risks:** The following table shows the number of Risks within each category. More detail is outlined in Appendix 2.

Very High	Risks scored here represent a severe threat to the delivery of Council objectives and service delivery and are outside of the risk appetite of the Council.	0	No change from previous quarter as first-time presenting risks in this way to Cabinet.
High/Medium High	Risks scored here represent a significant threat to the delivery of Council objectives and service delivery and are outside the risk appetite of the Council.	7	
Medium	Risks scored here represent a moderate threat to the delivery of Council objectives and service delivery and are within the risk appetite of the Council with some proportionate mitigation and regular monitoring required.	6	
Low	Risks here represent a minor threat to the delivery of Council objectives and service delivery and are within the risk appetite of the Council.	0	
Very Low	Risks scored here represent an insignificant threat to the delivery of Council objectives/service delivery and are within the risk appetite of the Council.	0	

Performance Highlights and Areas for Improvement

- 3.13 The following section of the report provides an overview of the key performance highlights and areas for improvement for the Council.
- 3.14 Covid-19 has had a significant impact on our residents, communities, businesses and Council, with increased demands and changing priorities. The impact of Covid-19 is clearly demonstrated in the performance against the measures of Q1 and Q2, particularly in those service areas where demands have increased, or resources utilised to support the Covid-19 response.
- 3.15 The revised Council Delivery Plan agreed by Cabinet in September provides a revised platform of activity. The Council will continue to monitor the impact of the pandemic on performance and recommend appropriate additional resources and

activities to ensure the Council continues to deliver key services and transformation projects alongside an effective local response and recovery plan to the pandemic.



Growing the economy

3.16 Collection of Business Rates (Measure reference 8)

The effects of Covid-19 have continued to have an impact on collection of Business Rates. However, the collection rate is currently holding up well in comparison to 2019. Retail, Hospitality and Leisure businesses have benefitted from a national scheme which has awarded 100% Rate Relief. The Council will be fully compensated financially for awarding these additional reliefs.

The pandemic and the resulting downturn in the economy has had a major impact on many businesses and it is anticipated that arrear levels will be higher at the end of the year.

3.17 External funding to support growth (Measure reference 14)

This has been yet another strong start to the financial year with the Council securing funds of £609,000 from Department for Transport (DfT), £521,976 from MHCLG and £428,572 from the Norfolk Strategic Fund. This funding will continue to support the Council to deliver key initiatives for the district including the delivery of an accessible station platform access route at Wymondham train station and delivery of Covid-19 economic recovery initiatives.



Supporting individuals and empowering communities

3.18 Numbers of vulnerable residents supported by our discretionary prevention services (Measure reference 15)

Supporting our most vulnerable residents has been one of our focus areas for Q1 and Q2 with 3,547 residents receiving prevention support. While these figures in Q2 are lower when compared to previous quarters, there is recognition that the complexity of the cases increase as the impact of Covid-19 is seen.

The end of this quarter sees us heading for a second wave of the pandemic, and significant time has been spent planning for the scenarios which may be present. We now have more established systems in place to support customers via a multi-partner and community focussed approach, though it is still expected to have a significant draw on resources.

3.19 % increase in the annual footfall of customers visiting SNCs leisure facilities and activities to lead healthier and more active lives (Measure reference 16)

Leisure facilities have been hit hard through the first half of this financial year with Centres being closed from mid-March and only being able to partially re-open mid-July with limited capacity for Gym and Classes. Through Q2, we have seen an 82% reduction in footfall at the Centres.

The centres commenced opening on the 24th July following Government relinquishing lockdown controls, and services and capacity have been ramping up gradually since, in a controlled and Covid-secure way. Whilst utilisation is low, memberships have been gradually increasing as services are re-opened and currently stand at just below half of pre Covid-19 membership levels. The Centres continue to receive great feedback from customers relating to the measures which have been put in place. Anxiety of many members re-entering leisure facilities is a national issue, and the Council benchmarks favourably against sector performance based on its strong marketing campaign on safety and cleanliness measures.

3.20 Number of working days taken to process new claims for Housing Benefit/Council Tax benefit (Measure reference 20)

The service saw an increase in the number of new claims and changes in circumstances as a result of the impact of the pandemic. This led to an increase in the number of working days taken to process new claims in Q1 of up to 8.2 days. However, in Q2, the service has significantly caught up with the increased workload, allowing the service to return to pre-Covid levels performance of 4.7 days which is significantly lower than the 7-day target.



**Protecting and improving the
natural and built environment,
whilst maximising quality of life**

3.21 Number of verified missed bins for all waste per 100,000 collections (Measure reference 29)

The missed bins figure remains relatively stable with the service displaying an overall continual improvement. In Q2, the Council recorded 28 missed bins per 100,000 against a target of no more than 30 per 100,000.

3.22 Number of confirmed incidents of fly tipping (Measure reference 31)

Covid-19 restrictions and the temporary closure County Council Household Waste Recycling Centres for a number of weeks has been a factor in the increase of fly tipping cases in Q2. A total 235 confirmed fly tips shows an increase of 73 fly tips on figures for this time last year. With centres reopened we hope to see a positive change in Q3.

We may also be seeing some behaviour change in that residents are spending more time at home, exercising in their local area and perhaps more likely to see and report incidents of fly tipping. This will continue to be reviewed in the coming weeks and months.



Moving with the times, working smartly and collaboratively

3.23 Staff absence levels - working days lost to short term sickness (Measure reference 4) and Staff retention rates (Measure reference 5)

As the Council returned to business as usual activities during Q2, absence figures at 1.11 working days per employee are below average and within our target of 4.5 days. It is important that as an organisation we have a healthy staff retention level, industry norm is around the 89% mark, and the yearend success for the organisation would look to be 90%, i.e. a turnover of 10%. The staff retention level is currently 97.5% and this is thought to be this high due to the current employment market.

The Council continues to seek to engage with the workforce at every opportunity to assess engagement levels which has helped to keep both sickness and retention at a positive level through these uncertain times. The uncertainty regarding the virus continues to pose a risk in terms of the possibility of a second wave and the ongoing impact on the health and wellbeing of employees. This is captured as a risk for the Council in the Strategic Risk Register.

3.24 Collection rate of Council Tax (Measure reference 7)

During Q1, recovery action was put on hold. This action along with the financial impact of the Covid-19 pandemic is leading to a reduction in amounts and percentages collected. However, engagement with our Council Taxpayers started through Q2 with soft reminders and recovery action taking place.

The resulting increase in arrears may have an adverse effect on collection rates in the forthcoming year as incomes recover for our residents and they pay other debts and reduce Council Tax arrears.

Strategic Risk

3.25 Following the agreement of Cabinet to the Risk Management Policy in August 2020, work has been underway to develop a new process for developing, monitoring and managing the strategic risks to the organisation. This report for Q2 is the first time the Council is reporting strategic risk in this way.

- 3.26 The Corporate Management Leadership Team are responsible for managing the Council's "strategic risks" – which are risks that are significant in size, impact and duration and could impact on the performance of the Council as a whole, and in particular on its ability to deliver its strategic priorities outlined in the Strategic Plan. This may include operational risks escalated from particular services to the leadership level due to the potential scale of their impact.
- 3.27 Risks are assessed for both their likelihood (on a scale of 1-5) and their impact if they were to happen (on a scale of 1-5), which are then combined to give each risk a severity score. Once all ongoing and planned mitigating actions are taken in consideration, each risk's "residual severity score" is recorded. This can be seen in detail in Appendix 2, and in summary in the dashboard earlier in this report. The higher the severity score, the more significant the risk is. Each quarter, the Council will present the Strategic Register in full, alongside a summary of the key changes to the register from the previous quarter.
- 3.28 As this is the first quarter for reporting strategic risk in this way following the agreement of the Risk Management Policy for the Council, no update has been provided on the actions planned to take place. An update will be brought through to Cabinet in Q3.

4 PROPOSED ACTION

- 4.1 Cabinet is asked to note the contents of this report and agree the recommendations.

5 OTHER OPTIONS

- 5.1 None applicable to this report.

6 ISSUES AND RISKS

- 6.1 **Resource Implications** – To support the organisations Covid-19 response, the Council is currently working through what the implications may be for requiring additional resource for the continuing response effort.
- 6.2 **Legal Implications** – no implications.
- 6.3 **Equality Implications** – no implications.
- 6.4 **Environmental Impact** – no implications.
- 6.5 **Crime and Disorder** – no implications.
- 6.6 **Risks** – The report has outlined the Strategic Risks faced by the Council which are set out in the Strategic Risk Register in appendix 2. The register will continue to be maintained and progress reported back to Cabinet in Q3.

7 CONCLUSION

- 7.1 The report has provided an overview of the position of the Council for performance, risk and finance for Q1 and Q2 2020/21. Despite the ongoing impacts of the Covid-19 pandemic, performance for the Council remains relatively stable in most areas and positive trends are now being seen.

8 RECOMMENDATIONS

Cabinet to:

1. Note the revenue and capital position (variance details in Appendix 1)
2. Note the current position with respect to risks and agree the actions to support risk mitigation (detailed in Appendix 2).
3. Note the 2020/21 performance for Q1 and Q2 (detail in Appendix 3).

Appendix 1

South Norfolk Council – Finance for Q2 2020/21

Appendix 1 provides an overview of the variances for the budget in Q2.



South Norfolk Council – Explanation of Variances

MD & Resources

						000's	000's	000's	Explanation
Directorate	Service Area	Variance Level	Sub Service area	Cost Centre	CC Description	Bud YTD	Act YTD	Var	
Managing Director	Chief Of Staff	All Other				£ 390	£ 362	£ 29	
	Chief Of Staff Total					£ 390	£ 362	£ 29	
	Managing Director	All Other				£ 189	£ 210	-£ 21	
	Managing Director Total					£ 189	£ 210	-£ 21	

						000's	000's	000's	Explanation
Directorate	Service Area	Variance Level	Sub Service area	Cost Centre	CC Description	Bud YTD	Act YTD	Var	
Resources	Finance	Over £25k	Corporate Management	S295000	Corporate Management	£ 936	£ 769	£ 167	Underspends on consultancy services (£129k) and other sundry underspend variances.
			Revenues	R482001	Revenues Team	£ 310	£ 357	-£ 47	Agency staff and external resource (£67k) used to cover the vacancies in the team, offset by pay savings (£15k). Trend will continue at a reduced rate as the vacancies are filled.
		All Other				£ 222	£ 179	£ 43	
	Finance Total					£ 1,469	£ 1,305	£ 163	
	Governance & Business Support	Over £25k	Electoral Services	D256000	Electoral Canvass & Registration	£ 26	-£ 21	£ 47	Delay in electoral canvass which is now underway and should return to budget by year end.
			Facilities	R479000	Facilities	£ 227	£ 197	£ 30	Underspends on utilities (£35k) and building maintenance (£9k), but this may reverse towards the end of the year. There is a small shortfall in income (£7k).
			Governance	D255000	Democratic Services	£ 201	£ 174	£ 27	Underspends across all members costs due to remote working and meetings.
			Governance	D416000	Governance	£ 342	£ 273	£ 69	Lower legal service use than budgeted, but variance may reduce in the second half of the year due to the change in legal provider.
			Human Resources	R476000	Human Resources	£ 147	£ 173	-£ 26	Overspends on agency staff (£11k) and job advertising (£15k). Some costs need to be recharged to BDC (currently surplus)
			Human Resources	R476001	Organisation Development	£ 123	£ 87	£ 36	Due to Covid the corporate training budget is underspent (£32k)
			IT & Digital	D414000	IT & Digital	£ 800	£ 715	£ 85	There are savings to date on pay (£15k), telephony (£15k), data infrastructure (£27k) & consultancy (£22k), but should return to budget level once delayed projects catch up.
		All Other				£ 63	£ 26	£ 37	
	Governance & Business Support Total					£ 1,928	£ 1,624	£ 304	
	Covid-19	Over £25k	Covid-19	R202000	Covid-19	£ -	-£ 1,089	£ 1,089	Currently there is unspent Covid19 funding.
						£ -	-£ 1,089	£ 1,089	

Place

						000's	000's	000's	Explanation
Directorate	Service Area	Variance Level	Sub Service area	Cost Centre	CC Description	Bud YTD	Act YTD	Var	
Place	Director of Place	Over £25k	Business Support	P284000	Business Support - Land Charges	-£ 44	-£ 74	£ 29	Income higher than vired budget and last years accrual for costs over estimated.
		All Other				£ 214	£ 207	£ 7	
	Director of Place Total					£ 170	£ 133	£ 37	
	Economic Growth	Over £25k	Community Assets Other	H230000	Community Assets	£ 105	£ 46	£ 58	Underspends on grounds maintenance and tree works. Depot costs are to be recharged in the second half of the year, however.
			Economic Development	D258000	Economic Dev	£ 259	£ 223	£ 36	Positive variance due to salary and employer costs underspends. The salary savings are offset by overspends in salary costs of the Growth Delivery Team.
			Growth Delivery Team	D258002	Growth Delivery Team	£ 19	£ 67	-£ 48	Salary overspends offset by underspend in Economic Development (as highlighted) and grant income not received (£38) offset by unspent Growth delivery consultancy costs (£25k).
						-£ 107	-£ 159	£ 51	Rental income higher than budgeted but projected to end the year similar to last year.
			Property	R207000	Investment Properties	£ 3	£ 43	-£ 39	No income received in Q2 to offset advertising and surveyors fees, under investigation.
			NRP Enterprise Zones	Y100000	NRP Enterprise Zone	£ 88	-£ 4	£ 93	
		All Other				£ 367	£ 216	£ 151	
	Economic Growth Total								
	Planning	Over £25k	CNC	P266000	Building Control	-£ 292	-£ 224	-£ 68	Lower than budgeted income due to Covid-19 (£127k). Covid adjustment only made to South Norfolk Council income share and therefore not applied to 4 of the 5 partners. This is partially offset by permanent savings on salaries (£17k), training expenses (£9k), staff travel (£7k) and consultancy (£5k).
			CNC	P266001	Business Support - Building Control	£ 53	£ 118	-£ 65	Offset by BDC surplus, budget incorrectly set in BDC for costs.
			Development Management	P271000	Development Management	-£ 8	-£ 101	£ 94	Favourable variance due to higher than budgeted income (£45k), having adjusted for Covid-19 loss of income claim, and savings made on vacant posts (£30k), and Consultancy Fees (£15k)
			Planning Policy	P288000	Planning Policy	£ 267	£ 185	£ 83	Favourable variance recorded due to anticipated spend on cluster work in South Norfolk being delayed into the second half of the financial year
		All Other				-£ 59	-£ 66	£ 8	
	Planning Total					-£ 38	-£ 89	£ 51	
	Regulatory		All Other			£ 339	£ 335	£ 5	
	Regulatory Total					£ 339	£ 335	£ 5	

People & Communities

						000's	000's	000's	Explanation
Directorate	Service Area	Variance Level	Sub Service area	Cost Centre	CC Description	Bud YTD	Act YTD	Var	
People & Communities	Community Service	Over £25k	Assistant Director - Community Services	H438000	Waste LATC	£ 63	£ 34	£ 28	LATC not proceeding.
			Leisure	D224000	Framingham Earl	£ 47	£ 21	£ 26	Delay in start date for taking management control of the centre.
			Leisure	D227000	Wymondham LC	£ 613	£ 469	£ 144	Income is £137k down on the Covid vired budget, but compensated by £119k pay cost savings and the balance of £144k is through reduced centre running costs , mostly utilities but including £63k instructor fees.
			Leisure	D228000	Diss LC	£ 272	£ 217	£ 54	Income is £53k down on the Covid vired budget, but compensated by £57k pay cost savings and the balance of £50k is through reduced centre running costs, mostly utilities.
			Leisure	D229000	L.Stratton LC	£ 254	£ 185	£ 69	Income is £5k down on the Covid vired budget and an overspend of £7k pay costs but with reduced centre running costs of £81k, mostly utilities but including £29k instructor fees.
			Operations	H234000	Street Cleaning	£ 199	£ 157	£ 42	Savings made because of posts no longer deemed necessary [£25k] and savings on fuel costs [£9k].
			Operations	H236000	Clinical Waste	£ 45	£ 5	£ 40	Savings due to delayed launch by County, now due to start in October.
			Operations	H241000	Garden Waste	-£ 741	-£ 816	£ 74	Increased income through higher recycling credits (£32k), due to increased tonnage, coupled with savings on agency employment costs (£35k) and lower cost fuel (£12k).
			Operations	H242000	Recycling	£ 374	£ 312	£ 62	Increased income from higher recycling credits (£43k), due to increased tonnage, and savings made on employment costs (£28k) & fuel (£19k).
			Operations	H436000	Transport Fleet	£ 355	£ 236	£ 118	Savings on repairs to vehicles with repairs in house rather than being outsourced, due to increased capacity of the Workshop team.
	All Other				£ 1,229	£ 1,082	£ 146		
	Community Service Total				£ 2,708	£ 1,904	£ 804		
	Individuals & Families	Over £25k	Benefits & Housing	P275000	Homelessness	-£ 82	-£ 42	-£ 40	Overspend on B&B Accomodation due to Covid (£130k) partly offset by increased income (£90k)
			Early Help	D244000	Youth Advisory Board	£ -	-£ 29	£ 29	YAB Grant received but not spent to date.
			Early Help Hub	D266000	Early Help Hub	£ 22	-£ 12	£ 34	Savings due to no longer funding CAB
			All Other			£ 849	£ 790	£ 59	
			Individuals & Families Total			£ 789	£ 707	£ 82	

Appendix 2

South Norfolk Council – Strategic Risk Register Update

Appendix 2 provides a detailed overview of the Strategic Risk Register for the Council covering Q1 and Q2 combined.



Strategic Risk Register – South Norfolk Council

Q2 Update

Objective	Ref	Risk description	Existing Controls	Risk with existing controls				Planned mitigating actions	Risk Owner	Delivery timescales	Current risk				Comments and progress on actions
				Likelihood	Impact	Severity score	Risk Response				Likelihood	Impact	Severity score	Within Risk Appetite?	
Moving with the times, working smartly and collaboratively	1	<p>Risk - An uncertain funding landscape for the public sector makes the Council finances unsustainable.</p> <p>Consequence - General fund expenditure exceeds budget and income targets not achieved. The Council is unable to deliver on its longer-term Strategic Plan or in year Delivery Plan.</p>	<ul style="list-style-type: none"> • Medium Term Financial Plan (MTFP) budget process and scenario planning. • Budget monitoring. • Investment and Income targets. • Implementing Broadland/South Norfolk Collaboration. 	4	5	20	Reduce	<ul style="list-style-type: none"> • 1a Continued development and review of MTFP to address budget gaps (particularly in light of the Covid-19 Pandemic and the ongoing impacts of this on our financial position). • 1b Delivery of the savings from collaboration with Broadland District Council • 1c Delivery of our Spark Transformation Programme to release savings and generate income. • 1d Increased Marketing Activity and Promotion of services, including reviewing options for commercialisation. • 1e Effective budget monitoring and training for staff at all levels. • 1f Regular monitoring of our current position and reporting to Members. • 1g Lobby government for adequate funding • 1h Review the Services we offer • 1i Look for further income generating opportunities 	Debbie Lorimer - Director of Resources	<p>1a - September 2020</p> <p>1b - March 2022</p> <p>1c - Ongoing</p> <p>1d - Ongoing</p> <p>1e - Q4 2021</p> <p>1f - Quarterly</p> <p>1g - Ongoing</p> <p>1h - Ongoing</p> <p>1i - Ongoing</p>	3	4	12	No	Comments and progress will be updated for Q3 as this is the first time reporting on our Strategic Risks in this way, following on from the agreement of the Risk Policy by Cabinets in September 2020.

Moving with the times, working smartly and collaboratively	2	<p>Risk - Commercial uncertainties associated with decisions taken as part of the Councils Commercial Strategy E.g. Property Development activities through the Council owned Big Sky Development, Commercial Waste etc</p> <p>Consequence - Reputational damage, lack of income generation and inability to repay council loans and associated interest.</p>	<ul style="list-style-type: none"> • Governance arrangements for commercial activities. • Budget monitoring. • Close management and monitoring of investments. • Quarterly reporting against the commercial strategy. 	4	5	20	Reduce	<ul style="list-style-type: none"> • 2a Robust oversight and governance arrangements for all commercial activities. • 2b Robust budget management for commercial activities. • 2c Thorough project management and business case development where required. • 2d Respond to market conditions, supply and demand. 	Trevor Holden - Managing Director	2a - Ongoing 2b - Ongoing 2c - Ongoing 2d - Ongoing	3	3	9	Yes	
Moving with the times, working smartly and collaboratively	3	<p>Risk - The Council fails to uphold a positive and trusted reputation and fails to meet customer and stakeholder expectations. Including making an unlawful decision or failure to comply with agreed policies or legal compliance.</p> <p>Consequence - Reputation declines, negative impact on trust of residents and businesses on the Councils ability to provide effective services. This may include a negative financial impact.</p>	<ul style="list-style-type: none"> • Internal and external communications. • Project Management with clear milestones for delivery and communication. • Freedom of Information (FOI) responses and complaints handling • Provide Officer and Member training to ensure an awareness of policies 	4	4	16	Reduce	<ul style="list-style-type: none"> • 3a Delivery of an effective internal and external Communications Strategy, with clear deliverables and milestones. • 3b Development and delivery of a Customer Satisfaction Strategy and action plan. • 3c Implement effective programme and project management approach and ensuring all external facing projects have clear communication messages and effective methods. • 3d Strong management and response to complaints handling, including Freedom of Information requests. Build a business case for an electronic system to manage FOIs. 	3a-3c Hannah Ralph - Chief of Staff 3d Debbie Lorimer – Director of Resources	3a - Q2 3b - Q4 3c - Q2 3d - Q3	3	3	9	Yes	

Supporting individuals and empowering communities	4	<p>Risk - The Council is unable to respond effectively to a wide scale disaster or business disruption, such as loss of key staff, loss of accommodation to deliver services etc.</p> <p>Consequence - Unable to support our residents and businesses as there is the potential of significant impact on service delivery and decline in reputation.</p>	<ul style="list-style-type: none"> • Councils form part of the Norfolk Resilience Forum (NRF). • Business Continuity Plans in place and tested. • Remote working for key staff tested and in place. • Covid-19 response has demonstrated flexibility of staff, providing added resilience to organisation. • County and District Memorandum of Understanding (MOU) in place to provide support in an emergency. • Two councils provide resilience e.g. two buildings which have two work area recovery sites. 	4	5	20	Reduce	<ul style="list-style-type: none"> • 4a Continue to ensure we have effective emergency plans and business continuity plans in place, working with key partners such as the NRF where possible. • 4b Test our plans through regular practice exercises where appropriate until commencement of usual exercise program. • 4c Promote and expand the reach of community emergency plans work being carried out internally and with county-based community resilience group to capture & engage with new and existing volunteer groups and voluntary agencies. • 4d Conduct lessons learnt activities to ensure that we continuously adapt and improve. 	Phil Courtier - Director of Place	4a - Ongoing 4b - Ongoing 4c - Q4 4d - Ongoing	3	4	12	No	
Supporting individuals and empowering communities	5	<p>Risk - The Council is unable to respond effectively to a second wave of the Covid-19 Pandemic.</p> <p>Consequence - Unable to support our residents and businesses as there is the potential of significant impact on service delivery, alongside potential decline in reputation, increase in staff absence and inability to address the Councils budget gaps in the future.</p>	<ul style="list-style-type: none"> • Councils part of Norfolk Resilience Forum. • Strategic and Tactical Coordination Groups established • Business Continuity Plans in place and tested. • Recovery Plan agreed by Cabinets and Councils and in the process of being implemented. • Majority of staff enabled to work from home. • HR processes refined and in place to support staff 	4	4	16	Reduce	<ul style="list-style-type: none"> • 5a Implement the organisational Recovery Plan, based on the 3 themes of: Economy, Communities and Organisation and Governance. • 5b Closely monitor and respond to the impacts of the pandemic on our economy and communities, working with key partners where possible. • 5c Continue to lobby government for adequate funding to support recovery. • 5d Implement phase 1 of the new ways of working project. • 5e Emergency Planning team running scenario-based exercises to document good practices from Covid-19 response and how we can be more effective against a 2nd wave. 	Trevor Holden - Managing Director	5a - Quarterly 5b - Ongoing 5c - Ongoing 5d - Q3 5e - Ongoing	4	3	12	No	

Moving with the times, working smartly and collaboratively	6	<p>Risk - The Council fails to take advantage and act quickly and proactively on the opportunities of Local Government Reform and devolution.</p> <p>Consequence - Failure to achieve potential for greater devolved funding and/or decision making to the region and the benefits this would bring for residents and businesses in our area..</p>	<ul style="list-style-type: none"> • Regular Horizon Scanning. • Active Membership of different groups such as the DCN, LGA, etc • Implementing Broadland/South Norfolk Collaboration. • Quarterly review of performance and risks to the organisation. • CMLT relationship building and liaison with key stakeholders such as central Government departments and professional bodies. 	4	5	20	Reduce	<ul style="list-style-type: none"> • 6a Review the outcomes of the Devolution White Paper when it is released. • 6b Continued regular horizon scanning and policy updates to CMLT, management team and Members, to ensure we stay abreast of changes and are able to have influence. 	Hannah Ralph - Chief of Staff	6a - October 2020 6b - Monthly	3	4	12	No	
Moving with the times, working smartly and collaboratively	7	<p>Risk - The Council fail to anticipate and respond to changes in the external environment such as political changes in the national priorities from Central Government.</p> <p>Consequence - Lack of ability to influence external drivers for greater change and additional resources required to achieve the new priorities or changing direction of travel.</p>	<ul style="list-style-type: none"> • Regular Horizon Scanning. • Active Membership of different groups such as the DCN, LGA, etc • Quarterly review of performance and risks to the organisation. • CMLT relationship building and liaison with key stakeholders such as central Government departments and professional bodies. 	3	4	12	Reduce	<ul style="list-style-type: none"> • 7a Continued regular horizon scanning and policy updates to CMLT and management team to ensure we stay abreast of changes and are able to have influence. 	Hannah Ralph - Chief of Staff	7a - Monthly	3	4	12	No	

Moving with the times, working smartly and collaboratively	8	<p>Risk - A major contractor or supplier fails to deliver on an agreed contract or service delivery.</p> <p>Consequence - Material impacts to our service delivery, potential large-scale financial impacts, increased resources to handle and manage customer expectations/complaints</p>	<ul style="list-style-type: none"> • Procurement processes in place to develop robust contracts. • Strong communication channels between suppliers and the Council. 	3	4	12	Reduce	<ul style="list-style-type: none"> • 8a Ensure staff are equipped with the right knowledge to ensure effective and proactive management of our contracts. • 8b Ensure contract registers are up to date. • 8c Work with partners to develop and embed social value in procurement to develop a more inclusive economy. 	<p>8a and b - Debbie Lorimer - Director of Resources</p> <p>8c - Jamie Sutterby, Director of People and Communities</p>	8a - Ongoing 8b - Q2 8c - ongoing	2	3	6	Yes	
Moving with the times, working smartly and collaboratively	9	<p>Risk - A major health and safety incident occurs (internal or external e.g. leisure centres/waste depot) of which the Council are responsible for.</p> <p>Consequence - Potential injury/harm to either staff or customers, service disruptions and potential cost implications</p>	<ul style="list-style-type: none"> • Risk assessments and action plans in place where needed. • Lone Working Controls in place. • Health and Safety Contract with Norfolk County Council in place. • Risks and mitigations are reviewed and managed through the Health and Safety Committee and CMLT. 	4	4	16	Reduce	<ul style="list-style-type: none"> • 9a Ensure we have risk assessments and action plans in place where needed. • 9b Provide organisational wide Health and Safety training where applicable. 	Debbie Lorimer - Director of Resources	9a - Ongoing 9b - Q4	2	4	8	Yes	
Moving with the times, working smartly and collaboratively	10	<p>Risk - The Council is unable to take advantage of the benefits and opportunities from collaborative working with Broadland Council and other key partners as a result of policy decision-making.</p> <p>Consequence - Failure to achieve efficiency savings through economies of scale and increased chance of not delivering upon key priorities set out in the organisations Strategic Plan.</p>	<ul style="list-style-type: none"> • Transformation Approach and initial programme of work in place. • Joint Lead Member group (JLMG) established to have Member oversight and steering of the collaboration programme. • Regular updates and briefings to CMLT, JLMG (monthly) and Customer Focus and Commercialisation Committee on the collaboration. • Collaboration costs and savings tracked quarterly and reported through to JLMG and in formal finance updates quarterly. 	4	4	16	Reduce	<ul style="list-style-type: none"> • 10a Review and update the transformation programme in light of the recent Covid-19 pandemic and updated Delivery Plan and Recovery Plan. • 10b Continue to deliver transformation training to all staff. • 10c Continue to review opportunities for further collaborative working with key partners. 	Trevor Holden – Managing Director	10a - Q2 10b - Ongoing 10c - Ongoing	3	3	9	Yes	

Moving with the times, working smartly and collaboratively	11	<p>Risk - The Council fails to handle and manage data adequately.</p> <p>Consequence - Potential loss of data, unlawful sharing of data, reputational damage and significant financial penalties.</p>	<ul style="list-style-type: none"> • Online GDPR training provided to all staff to raise awareness of how to handle and manage data correctly. • Remote access controls in place including two factor authentication. • Any breaches are identified internally and recorded as and when necessary. 	5	4	20	Reduce	<ul style="list-style-type: none"> • 11a Deliver the System Architecture Review project. • 11b Ensure all systems meet our data security requirements. • 11c Review of how data is managed whilst working remotely 	Debbie Lorimer - Director of Resources	11a - Q2 11b - Ongoing 11c - Q2	3	4	12	No	
Moving with the times, working smartly and collaboratively	12	<p>Risk - Capability and capacity of the workforce is not aligned effectively to key priorities and organisational requirements.</p> <p>Consequence - Poor standards of service delivery, service disruption, slow or minimal transformation and inability to meet savings targets as a result.</p>	<ul style="list-style-type: none"> • Four year Strategic Plan developed and in place which sets out the ambitions for the Council over the coming years. • Delivery Plan for the Council developed and in place which sets out the detailed projects and BAU for the Council in the coming year to 2021. • Management/Leadership Training and Development in progress. 	3	4	12	Reduce	<ul style="list-style-type: none"> • 12a Updated Delivery Plan for 2020/21 in light of the recent Covid-19 Pandemic to ensure it reflects our changing priorities. • 12b Scope and develop a talent management programme. • 12c Build our own talent - Develop projects to consider our use and opportunities of apprenticeships, internships, career placement, graduates etc • 12d Effective project and programme management processes and model in place to support delivery of priorities. 	12a and d Hannah Ralph - Chief of Staff 12b and c Debbie Lorimer - Director of Resources	12a - September 2020 12b - March 2021 12c - March 2021 12d - Q3	3	3	9	Yes	
Moving with the times, working smartly and collaborative	13	<p>Risk – The Council is unable maintain memberships and income levels at its Leisure Centres as a consequence of Covid-19.</p> <p>Consequence – Membership levels decrease. Expenditure levels exceed income levels and the commercial viability of the service decreases.</p>	<ul style="list-style-type: none"> • Detailed Covid-19 procedures in place Regular contact with existing members • Marketing campaigns to increase membership • Review of existing member offer • Budget monitoring 	4	5	20	Reduce	<ul style="list-style-type: none"> • 13a Reduced membership fee as a loyalty offer to existing members to encourage them back into Centres • 13b Provide a range of incentives to encourage existing and new members to return • 13c Delivery of the savings through reduced staff resources and utility costs • 13d Review existing procedures and restrictions in response to changing Government guidance • 13e Look for further income generating opportunities and review of membership offer • 13f Review product and pricing structure 	Simon Phelan- Assistant Director Community Services	1a – Until Dec 2021 1b - Ongoing 1c - Ongoing 1d - Ongoing 1e – Ongoing 1f – April 2022	3	4	12	No	

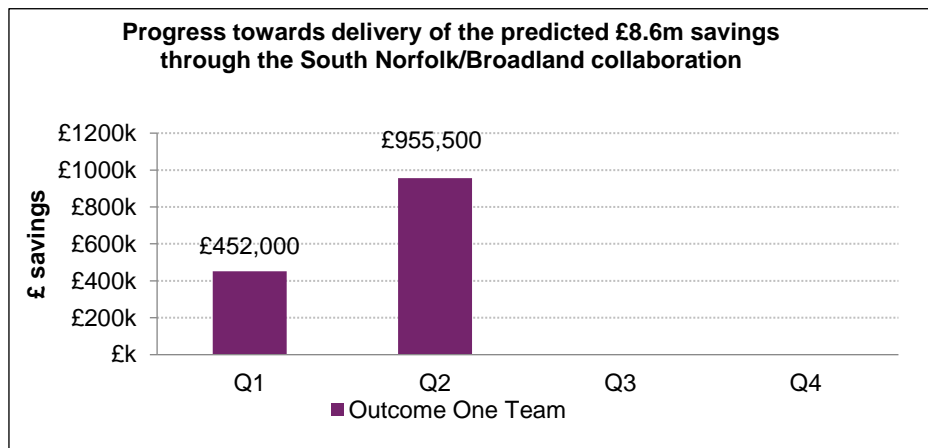
Appendix 3

South Norfolk Council – Delivery Measure Performance for Quarters 1 and 2 2020/21

Appendix 3 provides a detailed overview of the performance of the Council against its Delivery Plan for Q1 and Q2 combined. This includes the measures which are reported quarterly. There are a number of measures outlined at the end of the appendix which are reported annually to Cabinet, which will be brought through as part of the Q4 reports.



Progress towards delivery of the predicted £8.6m savings through the South Norfolk/Broadland collaboration (Measure reference 1)



Year End Success Target: £1,632,000

COMMENTS

In 2018, South Norfolk Council agreed to the Feasibility Study with Broadland District Council which began the collaboration between the two authorities. The Feasibility Study set out an indicative savings forecast of £8.6m over a five-year period.

The current five-year saving forecast is £9.2m. This is £0.6m better than the Feasibility Study Forecast of £8.6m.

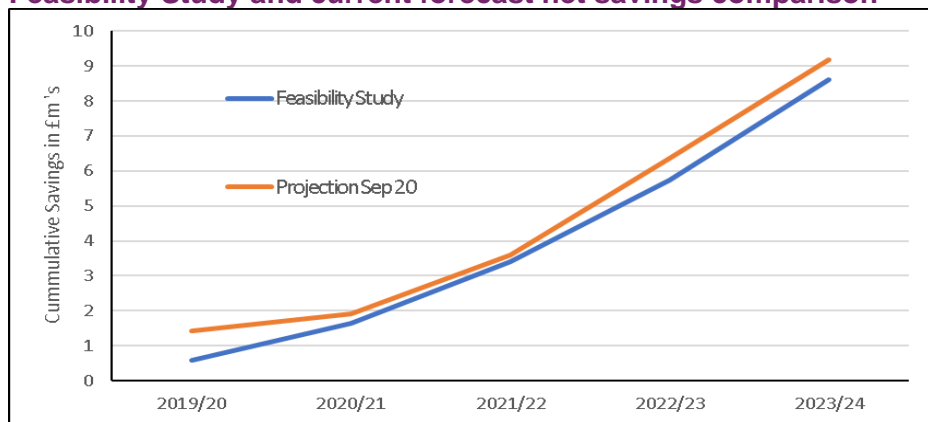
The savings delivered in 2019/20 were £1.419m and it is currently predicted that a cumulative savings of £1.911m will be achieved by the end of 2020/21.

RISK

Officers are currently reviewing the deliverability and timeframe for some of the One Joint Officer Team savings, as the impact of the Covid-19 pandemic is likely to have pushed back the timeframe for delivering some of the efficiency improvements and savings anticipated.

CONTEXT

Feasibility Study and current forecast net savings comparison



The graph to the left shows the current net savings projection (in orange) for the coming years for the collaboration compared to the feasibility Study forecasts (in blue) over the same period. This shows that the collaboration is currently forecasted to achieve greater savings than originally anticipated.

Customer satisfaction survey (%) (Measure reference 2)

COMMENTS

With the exception of our customer complaints data, we do not currently have an embedded way of measuring customer satisfaction across the Council as part of our business as usual practices.

In recognition of this a customer experience project is underway to discover where and how this is currently gathered to better understand how this can be shaped Council wide. Alongside this research will be carried out as to best practice approaches and recommendations so that we can outline how we can begin to implement this in a way that customer satisfaction can be measured consistently across our Council and its individual services.

Year End Success: Baseline

RISK

Without confirmation of our customer satisfaction baseline we are not able to fully impact the overall results of our wider transformation programme from a customer's perspective.

Although snapshots of customer satisfaction can be taken prior to and post implementation on a case by case basis to mitigate this risk at an individual project level.

CONTEXT

As part of the Customer Experience project we are reviewing the current mechanisms in place across the Council for the collation of customer feedback. Once we have established a consistent baseline, we will be able to seek to benchmark this against both the public and private sector data. Although it must be considered that there are multiple ways customer satisfaction can be recorded and measured and this will need to be considered in its wider context when benchmarking.

Staff satisfaction (Measure reference 3)

COMMENTS

We actively seek staff feedback and conduct regular staff surveys to understand what's important to our team, as a result an all staff briefing focused on Wellbeing was held in Q2. Reorientation sessions have been held with all staff including discussions regarding new ways of working and work preferences going forward. Designing and delivering a performance scheme that recognises small and large successes over the course of a year has been undertaken during Q2. Mental Health First Aid (MHFA) course was attended and 15 MHFA's are now in place.

All employees have the opportunity to work their hours flexibly with the aim of improving work-life balance. Regular team meetings are held to cascade and share key developments and priorities including monthly all staff briefings. Trade union and staff rep consultation and negotiation forums are in place to promote open and honest two-way dialogue and regular staff engagement in key organisational issues.

Year End Success: Baseline

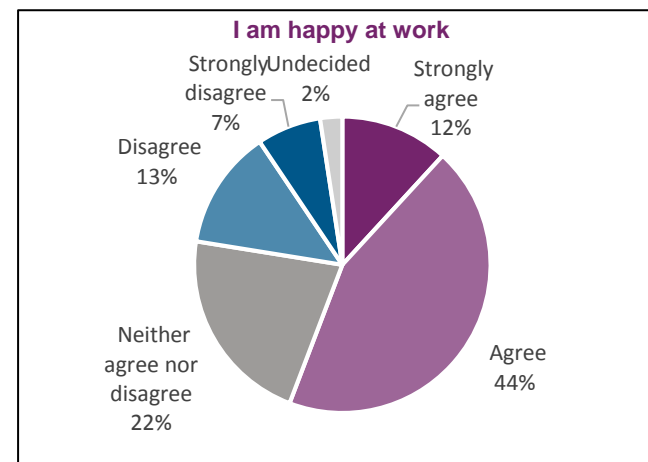
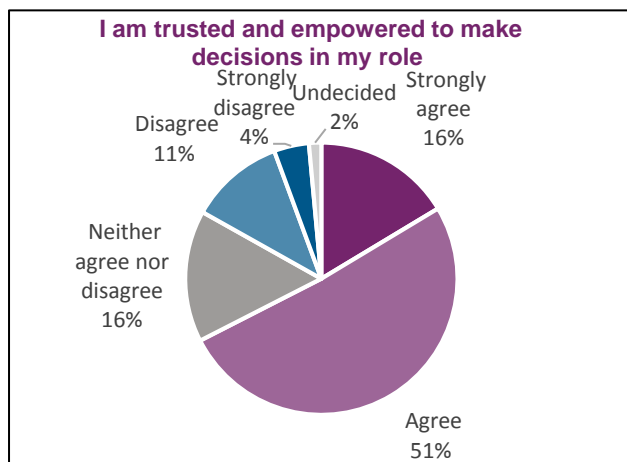
RISK

Continuing to Work from Home as per government guidance may have an impact on employee wellbeing and create feelings of isolation, as such support is being provided to colleagues.

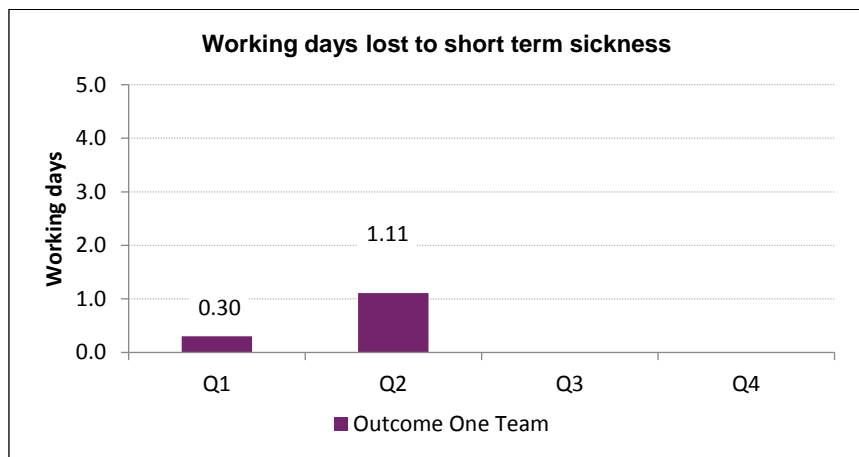
Analysis of all 3 wellbeing surveys that have taken place over Q1 and Q2 showed little variance or improvement despite easing of lockdown restrictions and wellbeing initiatives increased. Reorientation sessions are being held with all staff which includes details on how the Council workplaces are COVID secure to reassure staff about the measures that are in place to keep colleagues safe at work.

CONTEXT

Below provides an overview of the some of the results from the most recent staff survey



Staff absence levels - working days lost to short term sickness (Measure reference 4)



COMMENTS

These are the combined results for One Team for the two Councils.

Absence figures are below average for both Councils; however, we have seen an increase in short term sick days during Q2 as the Councils returned to business as usual activities during this quarter following the easing of lockdown measures.

Qualitative feedback from staff (and via external networking with other HR professionals) suggests that staff working from home locations are able to work more flexibly to complete their hours. Health challenges that would typically result in staff taking sick leave are able to be better managed from home because staff can be more flexible with the completion of their hours and do not have travel to work factors to consider.

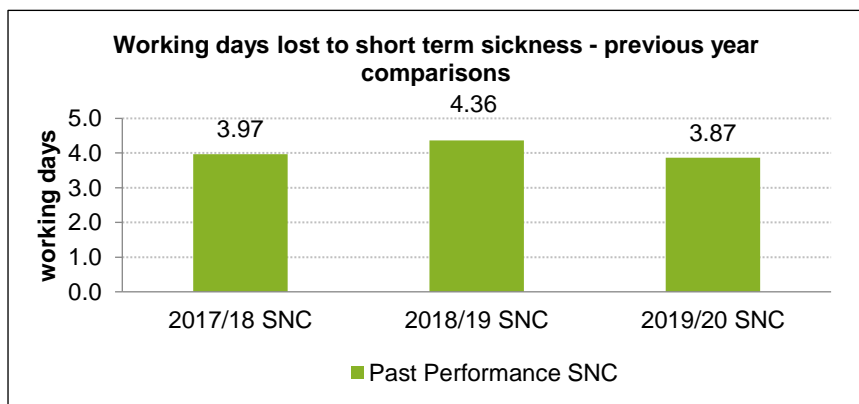
Another consideration is Covid-19 related absences (i.e. where employees or household members were displaying symptoms) which were recorded under specific codes which does not impact absence due to full pay being maintained.

Year End Success: 4.5 days

RISK

Absence continues to be closely monitored. The uncertainty regarding the virus continues to pose a risk in terms of the possibility of a second wave and the ongoing impact on the health and wellbeing of employees. Flu vaccinations are being offered to employees that are not eligible under the NHS to assist with health and wellbeing over the winter months.

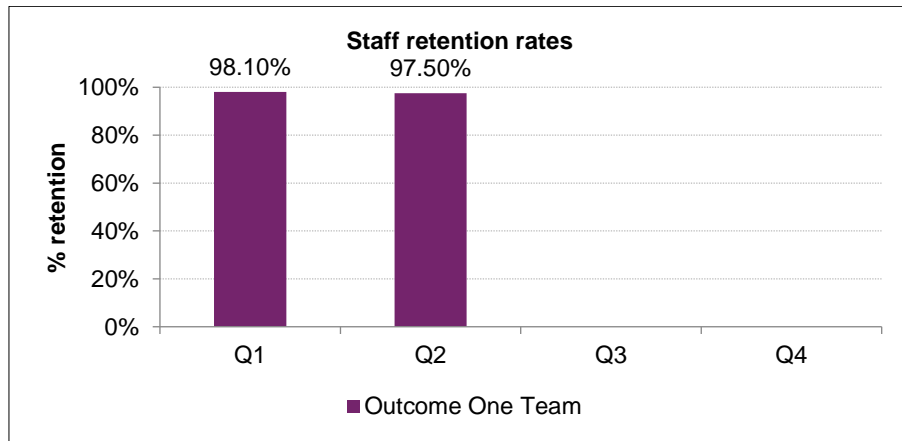
CONTEXT



The graph to the left shows the comparison data for short term sickness days lost for previous years. This shows that the number of working days lost is lower than previous years for the One Team.

The number of working days lost to sickness in the public sector has been consistently higher than the rate for the private sector since 1995, although both sectors have seen an overall decrease in the last few years (ONS, Labour Force Survey 2019). In 2018, the number of days lost to the public sector stood at 5.6. For context, the One Team currently has a lower than average sickness rate.

Staff retention (Measure reference 5)



COMMENTS

This is a new measure which is being reported for the first time this year. Please note the figure is combined for both Councils as One Team.

Staff retention remains high albeit a slight increase in leavers was seen in Q2. It is likely that staff retention will remain stable while local and national unemployment is increasing.

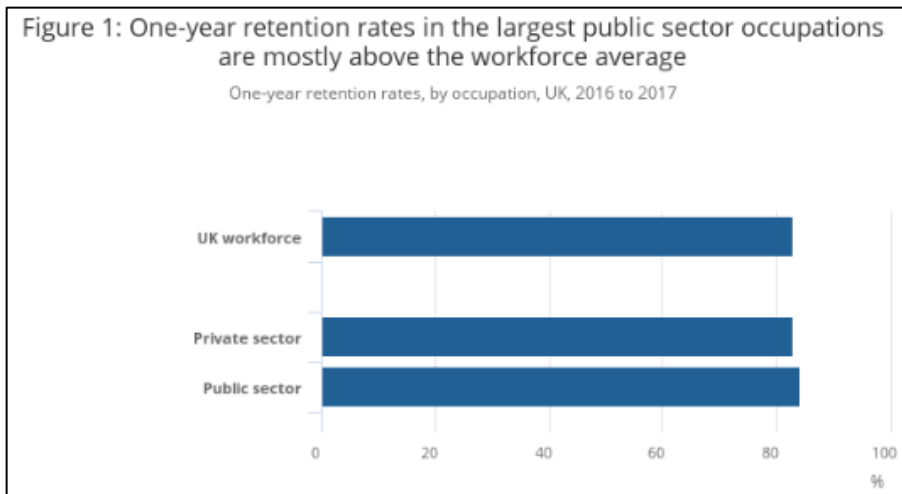
It is important that we have a healthy staff retention level, industry norm is around the 89% mark, and the yearend success for the organisation would look to be 90%, i.e. a turnover of 10%. The staff retention level is currently 97.5% and this is thought to be this high due to the current employment market. The Councils continue to seek to engage with the workforce at every opportunity to assess engagement levels.

Year End Success: 90%

RISK

Staff retention rates may change later in the year depending on the level of economic recovery from the Covid-19 pandemic.

CONTEXT

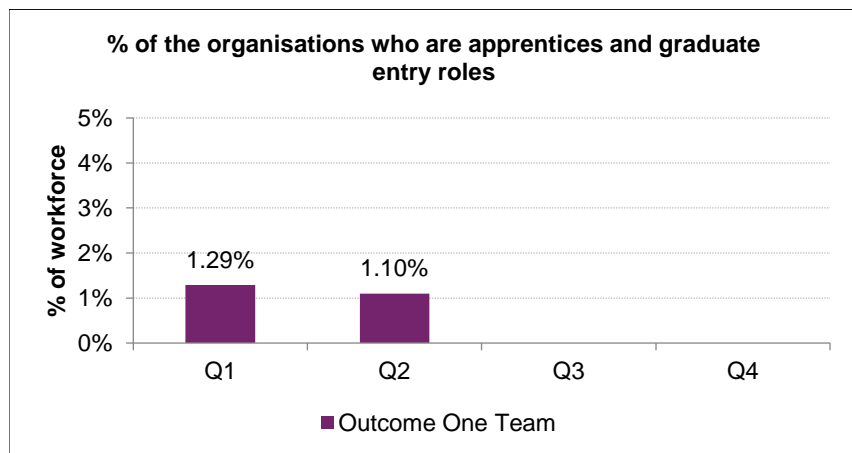


The latest data from the ONS shows that from 2016 to 2017, the UK workforce one-year retention rate was 83% and the overall public sector one-year retention rate was 84%. Similar to the trend seen across the workforce, most of the larger public sector occupations saw a fall in their one-year retention rate, between 2012 to 2013 and 2016 to 2017.

For Local and National Government, the retention rate currently sits at 89%, showing that the One Team is performing better than average.

Source: ONS, Annual Population Survey 2016/17

% of the organisations workforce who are apprentices and graduate entry roles (Measure reference 6)



COMMENTS

It is our aim to create apprentice roles for hard to recruit to service areas in order to grow our own skills. We currently have 15 apprentices in roles such as Business Administration and Exercise and Fitness. We will create an apprenticeship network both within our organisation and with our partners to provide learning opportunities and celebrate apprenticeships through events such as the Apprenticeship challenge. We will promote apprenticeships through events such as the Norfolk Careers and Skills festival and establish third party networks such as through Armed Forces, Disability Confidence scheme, and create links with universities and local schools/colleges. We will work with local universities to identify career pathways for local graduates into the public sector and develop workforce plans with each directorate and to identify gaps and formulate plans to fill gaps with a focus on graduates / apprentices and work placement opportunities. We will also be supporting the Kickstart scheme which is a scheme supporting young people during the COVID recovery by offering a minimum of 30 work placements through the Councils and partner organisations.

Year End Success: Baseline

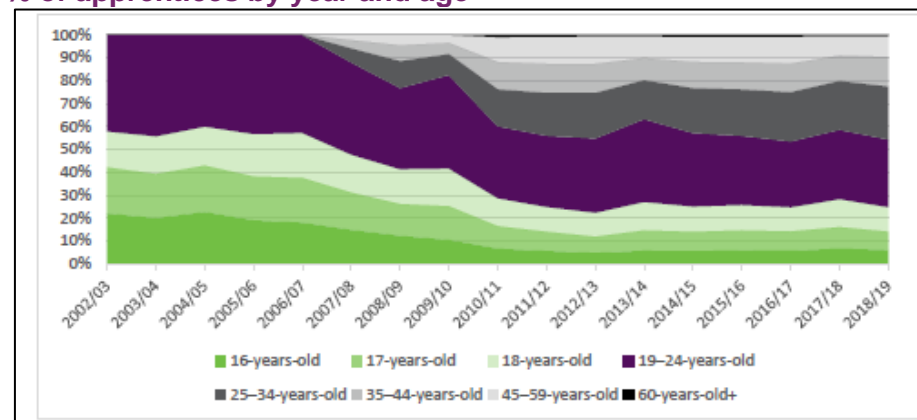
RISK

There is currently limited focus on this area in the current quarter due to prioritisation of focus on elements such as Staff Wellbeing/engagement/performance management review/reorientation briefings to staff. Work will re-commence on these targeted actions in the next quarter. There is not a significant risk at this stage.

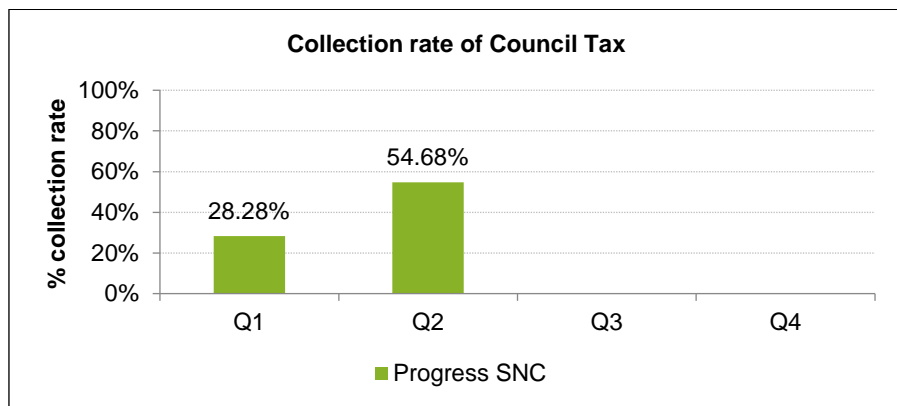
CONTEXT

Chartered Institute of Personnel Development (CIPD) July 2020 report (right) found that most apprenticeships go to existing employees rather than new labour market entrants with an increasing share of opportunities going to those aged 25 and over. Since the introduction of the Apprenticeship Levy, employers have increasingly focused their investment in providing apprenticeship training to older and in many cases, already highly experienced and qualified workers which is evidenced by the growing numbers of apprenticeships in leadership and management and other professional training. This demonstrates that the Council is in line with other businesses where apprentice and graduates starts have slowed due to the current climate, however it is the aim of the Council to focus on recruiting entry level apprentices and graduates from September 2020. Source: Apprenticeship statistics DFE, 2002-2019

% of apprentices by year and age



Collection rate of Council Tax (Measure reference 7)



COMMENTS

Collection rates have been impacted by the Covid-19 pandemic, leading to a reduction in amounts and percentages collected. Recovery notices were not sent in Q1 due to difficulties faced across the board by residents and the national situation with Covid-19. However, engagement restarted early in Q2 with soft reminder notices followed by normal reminders and final notices. We have been unable to issue summonses since March 2020 due to courts not being open for Council Tax work. However, we are hopeful that we will be able to resume court work over the Autumn and Winter and have been in dialogue with the court over this.

Collection rates will continue to be depressed due to the increase in number of people facing financial difficulty and claiming Council Tax Reduction/Support.

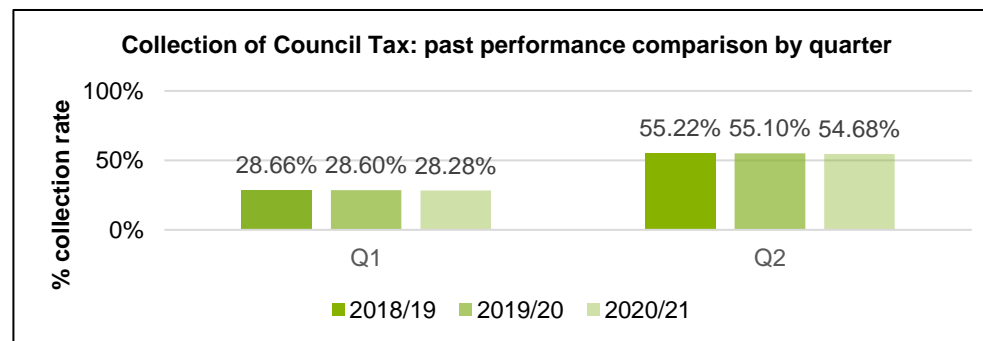
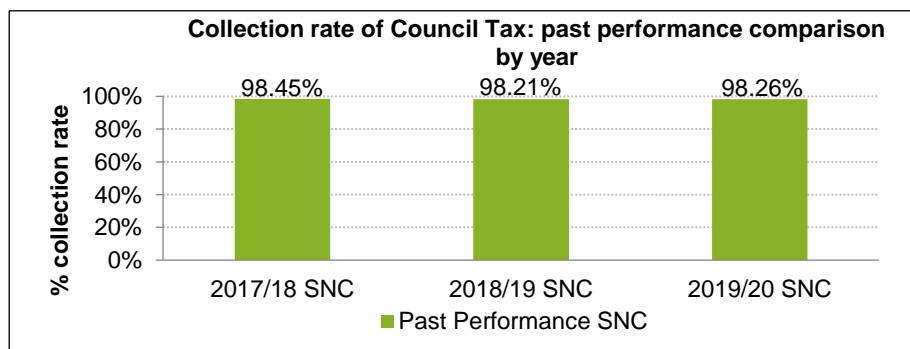
Year End Success: 98.5%

RISK

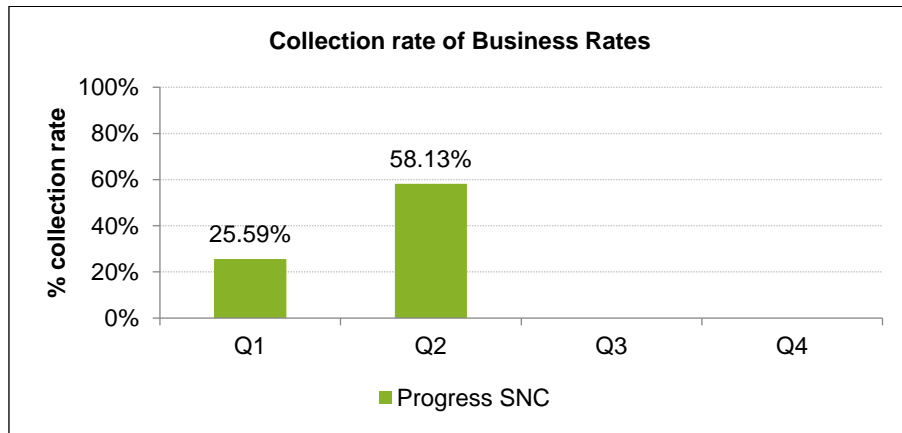
Collection rates will be lower this year than in previous years. This is due to the effects of the pandemic. The resulting increase in arrears may have an adverse effect on collection rates in the forthcoming year as incomes recover for our residents and they pay other debts and reduce Council Tax arrears. There is a risk that as more people come off furlough that they may become unemployed and find it difficult to pay ongoing charges. The risk of a second wave of Coronavirus could also pose a risk as it may mean that recovery action is further suspended.

CONTEXT

The graphs below show the Council Tax collection rates performance for previous years and quarters for comparison. Quarter 2 this year is slightly lower than previous years due to the challenges faced with the pandemic and its effect on households to pay.



Collection of Business Rates (Measure reference 8)



COMMENTS

The collection rate is currently holding up well in comparison to 2019. Retail, Hospitality and Leisure businesses have benefitted from a national scheme which has awarded 100% Rate Relief. This has been a major help to these sectors, but many other businesses are also struggling with the effect of the pandemic. The Council will be fully compensated financially for awarding these additional reliefs. The team has worked with businesses to offer extended and deferred payments where appropriate and to consider Hardship relief where needed. However, the effects of Covid-19 on businesses mean that collection rates are likely to be depressed this year. Recovery action recommenced in Q2 and reminder notices have been sent and a dialogue encouraged with businesses to see how they can be assisted or signposted to our Economic Development team. Court action is still suspended until the Court Service reopens to Business Rates cases and this is also affecting our ability to recover arrears.

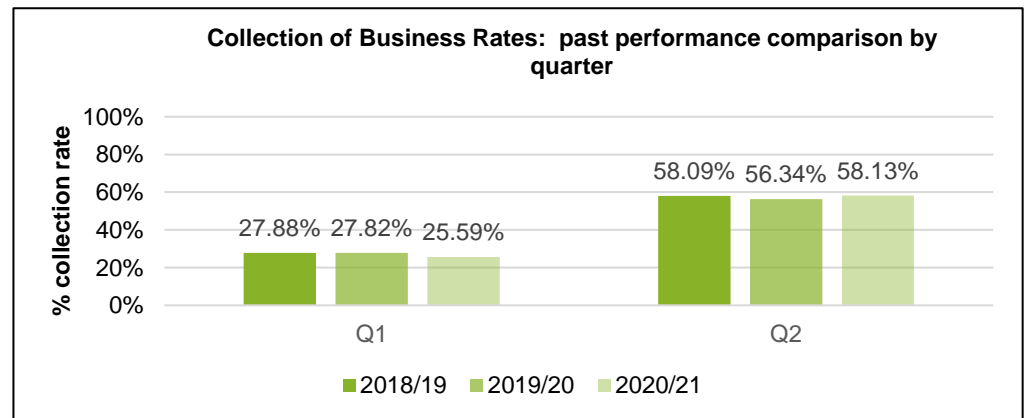
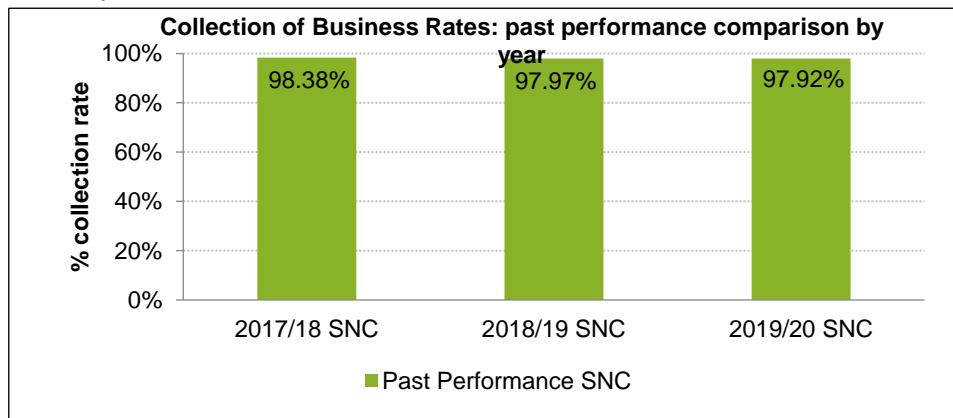
Year End Success: 98%

RISK

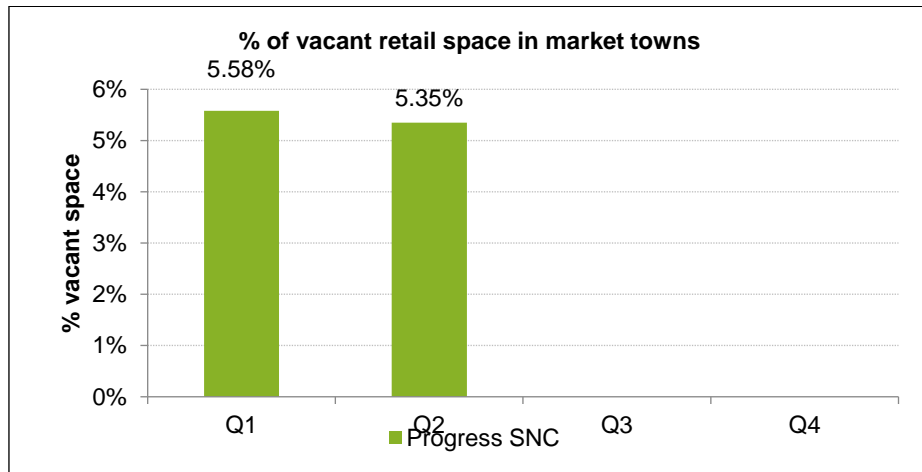
There is no doubt that collection rates will be lower this year and probably for the forthcoming year. The pandemic and the resulting downturn in the economy has had a major impact on many businesses and arrears levels will be higher at the end of the year. The risk of further local or national lockdowns mean that there is a risk of collection rates being further affected.

CONTEXT

The graphs below show the Business Rates collection rates performance for previous years and quarters for comparison. This shows that performance is similar to previous year Q2's.



% of vacant retail space in market towns (Measure reference 12)



COMMENTS

Diss – the vacancy rate has been static for the past three-quarter ends.

Harleston - vacant units have reduced with two units being reoccupied during the last quarter. A former butcher was closed for approximately five months before reopening as a gift and sweet shop, and a blinds and curtain business moved from Harleston Industrial Estate to a high street location.

Wymondham – the vacancy rate has increased in the past quarter with two further units becoming vacant. A bookshop proprietor surrendered the lease of a unit in Town Green to retire as previously planned, and a former window and conservatory showroom on a business park was reoccupied by a business expanding from a neighbouring unit.

In response to the Covid-19 pandemic South Norfolk Council worked with partner organisations in the market towns of Harleston, Diss and Wymondham to support the reopening of non-essential retail and hospitality businesses in July 2020, as part of the CONFIDENCE campaign. The primary objective of the work was to support the reopening of the local economy by ensuring high streets in the three market towns were 'clean, safe and vibrant' spaces where residents and visitors could visit and shop, confident that appropriate social distancing measures were in place and being adhered to.

A range of changes were implemented, including the use of emergency Traffic Regulation Orders (TROs), provision of hand sanitisers, and the deployment of redeployed staff and volunteers to act as on-street advisers

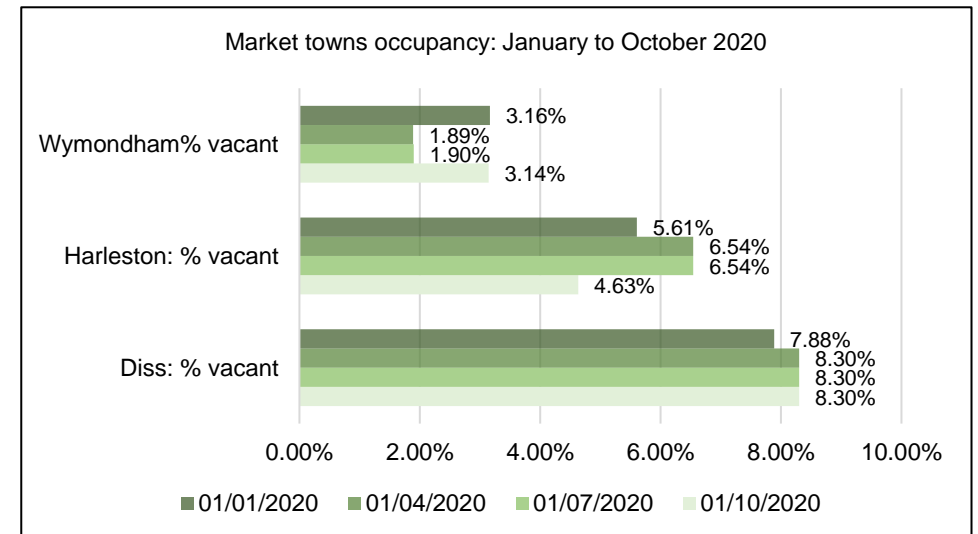
Year End Success: Baseline

RISK

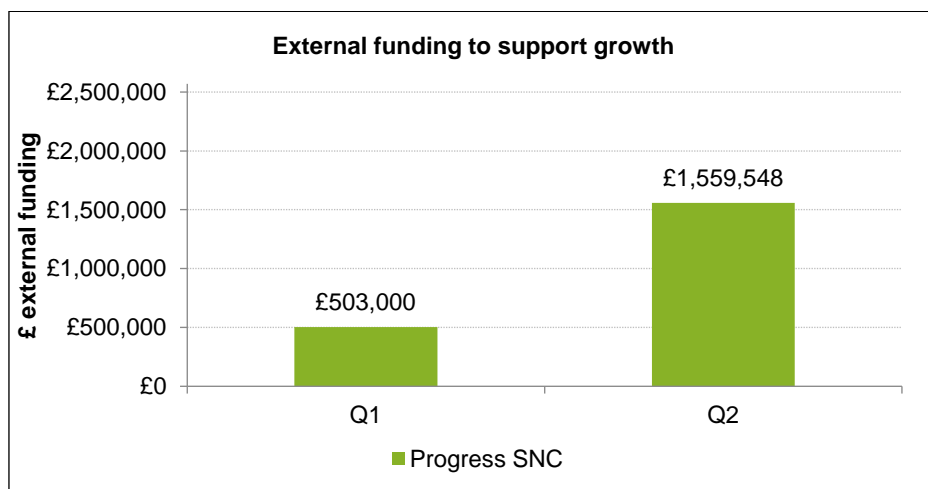
The economic impact of the Covid-19 pandemic on our market towns remains uncertain. We are working with town teams and key stakeholders to make market town high streets more future proof post-COVID to encourage greater footfall. Work will focus on improving the streetscape and customer experience on the high street. In Harleston residents and businesses have recently been consulted on the future of temporary changes that were made to the local road layout and open spaces.

CONTEXT

The chart to the right shows the vacant occupancy rate for each market town in South Norfolk in 2020. This shows varying vacancy rates with a slight increase for all market towns from April – July. Harleston is the only market town who has seen a decrease at the beginning of October this year



External funding to support growth (Measure reference 14)



COMMENTS

£609,000 has been secured from DfT to deliver an accessible station platform access route at Wymondham train station. This funding forms part of the Transforming Cities bid which is required to be delivered over a c.3 year period.

£521,976 has been secured from MHCLG to deliver the 'Next Steps Accommodation' programme. Following the Govt's earlier 'Everyone In' initiative, which placed those in unsafe communal settings or at imminent risk of rough sleeping into emergency accommodation during the COVID-19 pandemic, the Next Steps Accommodation programme makes available the financial resources needed to support local authorities and their partners to prevent these people from returning to the streets. Funding will support the delivery of new homes in the district.

£428,572 has been secured from the Norfolk Strategic Fund to support with Covid-19 economic recovery initiatives.

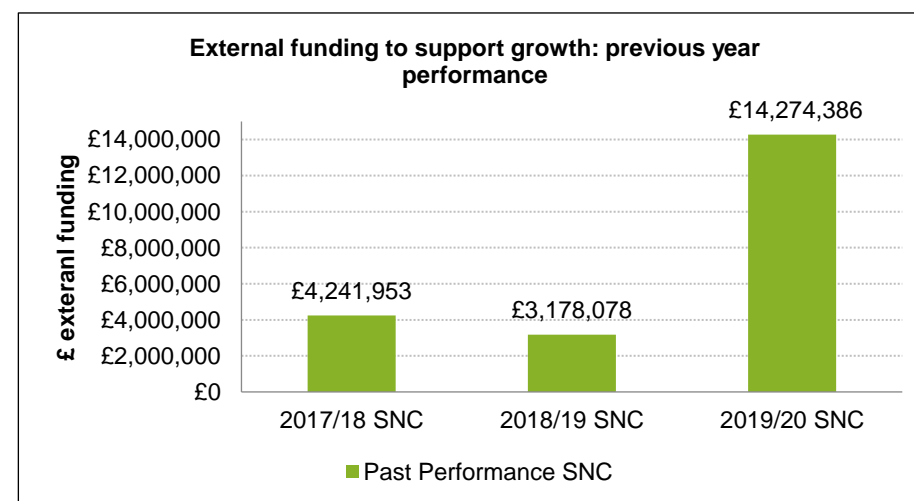
Year End Success: Baseline

RISK

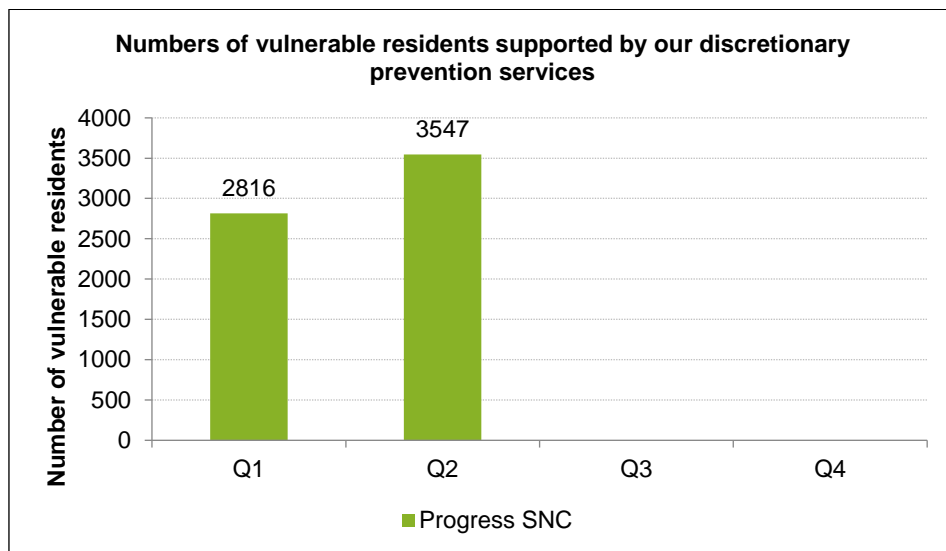
Norwich Research Park Zone 4 building: Work is ongoing to complete the lease terms and market the building to ensure 100% occupation once the building is complete.

CONTEXT

The graph to the right shows previous full year achievements for external funding in the district.



Numbers of vulnerable residents supported by our discretionary prevention services (Measure reference 15)



COMMENTS

These figures include the number we have helped through our support of the Covid-19 crisis, which has seen a significant increase as we found residents vulnerable through shielding and financial hardship. Our response has ensured we quickly put a system in place to identify and support the residents who needed us the most. As part of this response, we have to work closely with our communities to help support our most vulnerable residents.

The Q2 figures includes 157 debt and welfare cases and 406 social prescribing (SP) cases. The figures for social prescribing are lower than would be expected due to the continued effect of Covid-19 in primary care settings throughout July and August. Referral rates have returned to normal in September.

Figures in this quarter reflect the reduced number of times the team provided Covid-19 related support. Whilst these figures are lower, the complexity of the cases increases as the impact of Covid-19 is seen.

Year End Success: 2,000 residents (combined figure for BDC and SNC)

RISK

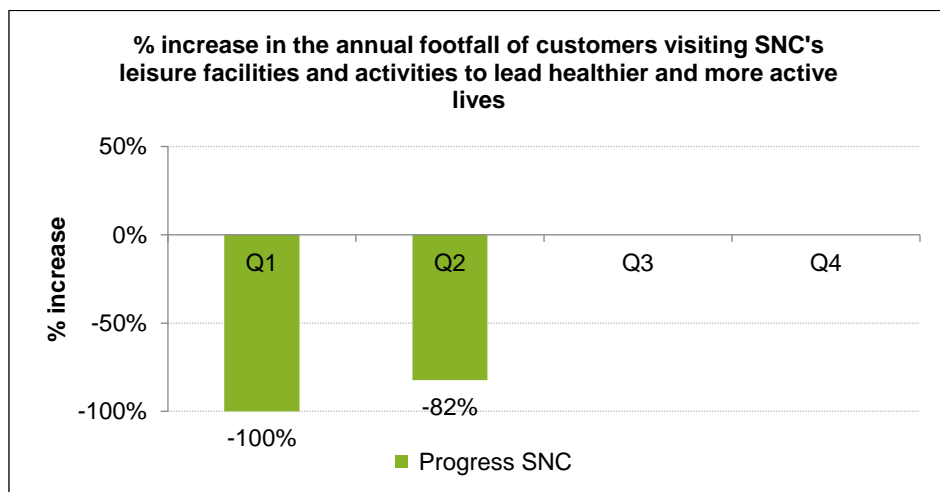
The end of this quarter sees us heading for a second wave of the pandemic, and significant time has been spent planning for the scenarios which may be present. Officers have reviewed the response during the first wave and taken best practice to apply again.

We now have more established systems in place to support customers via a multi-partner and community focussed approach, though the impact on resources is still expected to be significant. This quarter has also seen more targeted support for those who are impacted by Covid-19 in localised outbreaks - utilising 7 day working processes and supporting staff to carryout doorstep checks on our most vulnerable customers. This work is expected to increase as we go into winter months.

CONTEXT

CCG guidance to Primary Care Networks---demonstrates the effective use of SP is 1% of patient list is referred from Primary Care to SP in a year. This will be monitored through read codes over the forthcoming year: 88% of GP practices hit or exceeded the target last year. The monitoring year forthcoming will be June 2020 to May 2021 to allow for disruptions in Primary Care. There is a high degree of confidence that we will exceed 90% in this year. NHS England guidance to Social Prescribers---the expected rate of referral to each social prescriber should be 240 in a year. In the last year, our rate of referral as 376 per social prescriber. We are confident that the NHS expected referral rate will be met or exceeded in the current year, adjusting for an absence of referrals in Q1 due to closure of GP practices.

% increase in the annual footfall of customers visiting SNCs leisure facilities and activities to lead healthier and more active lives (Measure reference 16)



Year End Success: 5% increase

COMMENTS

The Leisure Service has been working solidly to ensure that our facilities are Covid-secure and that our customers feel reassured that their safety is of paramount importance, in a legislative environment that is constantly changing.

An external review of our health and safety processes remarked 'From a personal viewpoint I feel your model may have obtained Government assent at an earlier phase if this had been universal across the industry.' The service was supported through its reopening by an external marketing agency that has seen both membership and footfall rise week-on-week since the end of July, with a key message being 'we're ready when you are'.

The Government support package announced during Q2 for loss of income by local authorities during the financial year will go a long way to soften the blow of both a long enforced closure throughout Q1 and Q2 and reduced return of Direct Debit fitness members on reopening, whose income normally accounts for about 60% of total. Continued uncertainty over Q3 and Q4 and the new tiered restriction system will not help consumer confidence. This aforementioned support will help to minimise the financial impact on the service this year (albeit with levels of SNC subsidy required) but it is expected that the 2021/22 financial year will be extremely challenging, without significant additional government support. Swim School returns have held up well, and in some stages, we are operating at full capacity so the continued operation of the pools is crucial to allow this to remain so.

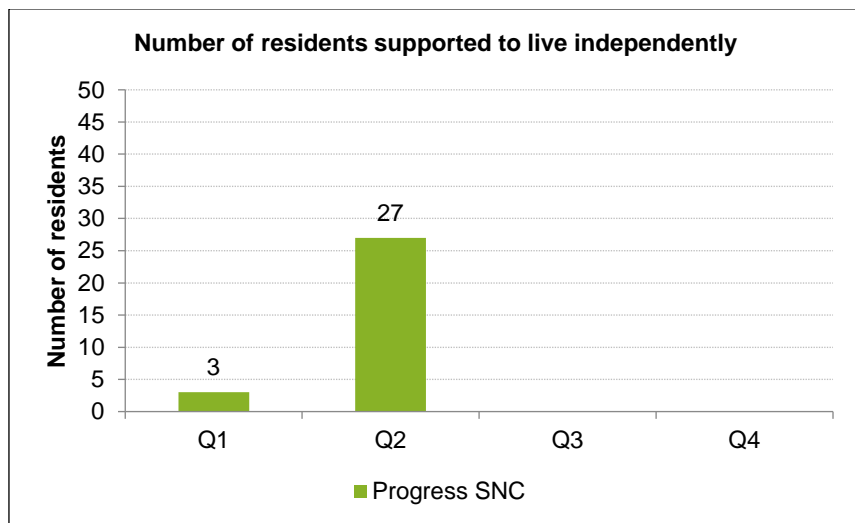
RISK

Centres partially re-opened mid-July with limited capacity for Gym and Classes. Kids camp has not run over the summer and restrictions on team sports etc meant that clubs did not return during this quarter. Soft play was unable to reopen until late August - Wymondham Pool re-opened September with limited session and reduced capacity in swim school - Diss Pool re-opened mid-September.

CONTEXT

Feedback from customers has also been good with numerous comments on our social media channels, including 'Thank you, feel very safe using the gym and other users are being very considerate' and 'It's been great at WLC and KP, thanks!'. Another customer said 'We have been visiting Bananas once a week since it reopened and cannot praise the team highly enough. We have been very impressed with the disinfection protocol, and social distancing measures in place'. Nationally, the outlook for the sport and physical activity sector is bleak – ukactive and Community Leisure UK estimate that 35% of publicly-owned facilities did not open when they were allowed to in Q2, and that 48% are at risk of permanent closure by the end of Q3 without any further support.

Number of residents supported to live independently (Measure reference 17)



COMMENTS

During Q1 3 DFG cases have been completed, two in privately owned/rented properties and one in a housing association home. No gaining independence grants or care and repair cases outside of DFGs were completed.

All work was put on hold due to Covid-19, however, no one was left without essential facilities. The vast majority of housing standards work relates to clinically vulnerable and extremely vulnerable residents, therefore any restrictions impact massively on the delivery of the service. As restrictions have eased, work has begun to start again, initially with external works and those not shielding.

A total of 24 disabled facility grants have been completed this quarter, 14 in privately owned/rented home and 10 in social housing.

As Covid-19 restrictions eased, external works commenced first, followed by internal adaptations for those not shielding and finally adaptations for those previously shielding. There is a backlog of 90 cases as we start to tackle those cases that we couldn't support in Q1 due to shielding.

Year End Success: 100 residents

RISK

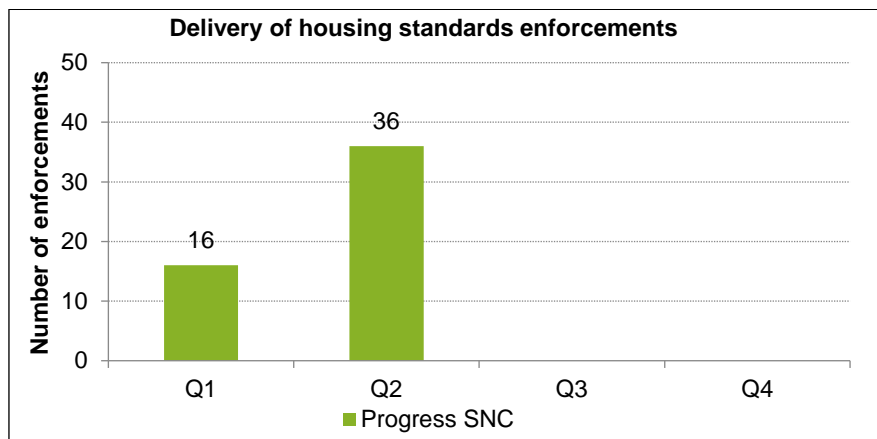
The vast majority of housing standards work relates to clinically vulnerable and extremely vulnerable residents, therefore any restrictions impact massively on the delivery of the service. Any future restrictions imposed will affect delivery. Funding for this measure is from the Ministry of Housing, Communities and Local Government via the Better Care Fund. Budgets are monitored to ensure expenditure aligns as closely to budget as possible.

CONTEXT

One of the key responsibilities for the Council is to support people to remain in their own home. This has the dual effect of reducing pressure on services but also enables our residents to remain independent, which is a key factor, particularly for older people. We deploy a range of tools to help residents, the main focus is disabled facility grants which enable us to physically adapt people's property. We also have a handyman scheme and support people to keep their homes warm.

This target enables us to judge how many people we are able to support, by assessing trends in cost, complexity, delivery levels and resource.

Delivery of housing standards enforcement (Measure reference 18)



COMMENTS

Shown as cumulative total for the year. In the first quarter, 13 disrepair complaints have been resolved and 3 occurrences of gypsies and travellers were reported and action taken. Covid-19 restrictions meant that G&T were encouraged to minimise movement during the lockdown period and action was taken to support this. Proactive enforcement work was put on hold due to Covid-19 restrictions and staff redeployed to assist with the community response.

During the second quarter of 2020/21, 10 disrepair complaints have been resolved, and 10 occurrences of gypsies and travellers have been reported and actioned.

In the quarter 2 of 2019/20, nine disrepair complaints were resolved, and four reports of gypsies and travellers were actioned. Where possible, disrepair issues are being sorted remotely with the use of photos, videos and the option of video calling.

Year End Success: 75 enforcements

RISK

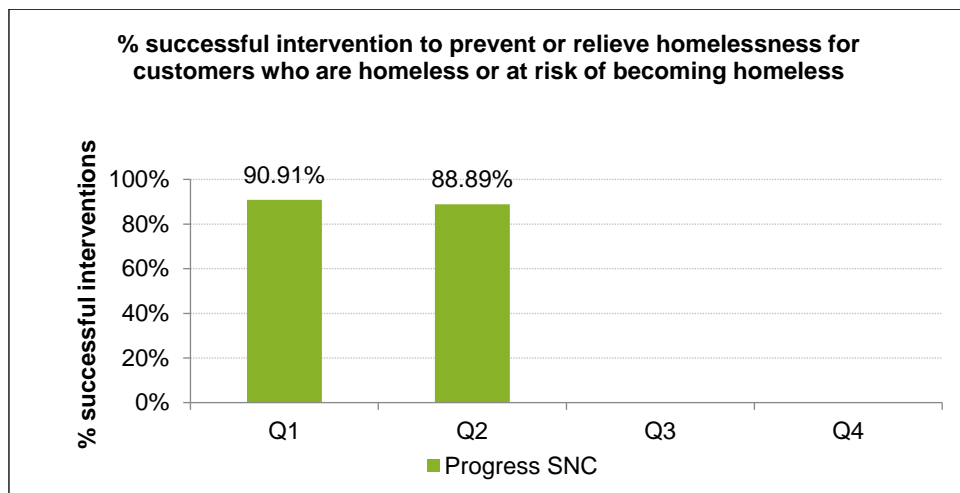
The main risk relates to complaint demand increasing in the tenanted private sector. At present the demand is within the team's capacity.

CONTEXT

A key aim of the Council is to ensure that we deal appropriately with private sector landlords who rent their properties out. Our role is to ensure that these properties are maintained to an acceptable standard. This work includes identifying, registering and monitoring Houses of Multiple Occupation to ensure they are safe, compliant and are not used for exploitation.

We also ensure that unauthorised gypsy and traveller sites are dealt with appropriately, balancing the welfare of gypsies and travellers, with the impact on the local community.

% successful intervention to prevent or relieve homelessness for customers who are homeless or at risk of becoming homeless (Measure reference 19)



COMMENTS

This figure relates to 36 cases, 4 of which have been unsuccessful.

We have seen a 22% increase in those facing homelessness in Q2 due to the sustained impact of Covid-19. Traditionally at point of presentation, officers are able to discuss alternative options such as friends or families whilst we seek future alternative accommodation.

As a result of Covid-19, these options are not available providing the team with far less time to prevent homelessness. We continue to work closely with those that do call to prevent homelessness at all opportunities.

Year End Success: 80% successful interventions

RISK

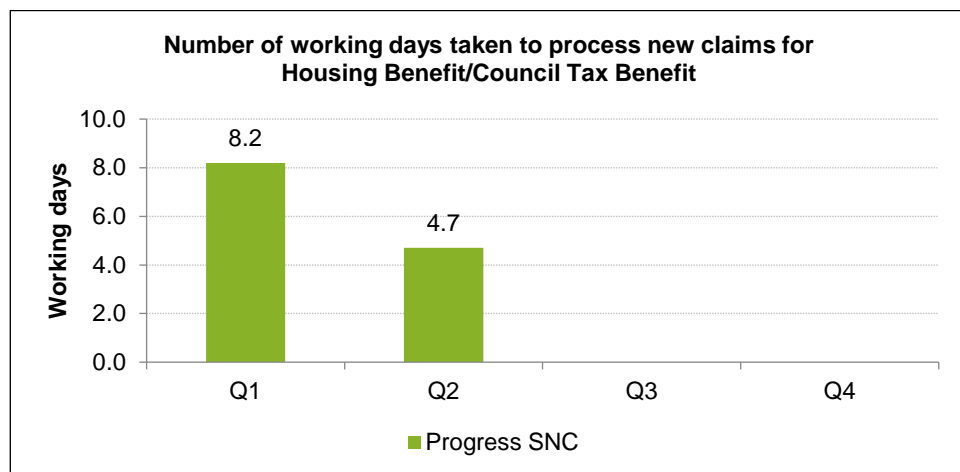
Housing and homelessness will continue to be monitored closely throughout this financial year as we monitor the impact of the Covid-19 crisis on our housing solutions service. We have already seen a 50% increase in demand, and we expect this to continue throughout the year. The team are now progressing a 'Housing Best in Class' project which will ensure we are providing the best Housing service to our residents.

CONTEXT

Preventing and dealing with homelessness is a key legislative requirement for the Council. Under the Homelessness Reduction Action, we are required to support people if they are risk of homelessness, up to 56 days before they are made homeless. The Council has a strong advice and prevention ethos and this measure help us to ensure we maintain this ethos.

Nationally, there has been an increasing challenge when it comes to the impact of Covid-19 on homelessness. Since the start of the coronavirus crisis, Councils across the country have faced significant challenges housing large numbers of homeless people in a short space of time. Work continues on a national scale to ensure that Councils have the right support and funding in place to deal with the increased demand and support requirements.

Number of working days taken to process new claims for Housing Benefit/Council Tax benefit (Measure reference 20)



COMMENTS

The team have seen a significant increase in work due to the Covid-19 crisis with residents struggling financially due to furloughing. The team started with a backlog of claims in Quarter one when the crisis, which was due to a number of vacancies within the team. Also, the team went from circa 40 calls a day to 200 calls a day as part of the community hub response. The reaction to calls has reduced the team's ability to process new claims.

We have seen an increase in circa 50% of change of circumstances over this quarter, as the COVID crisis developed, as residents found themselves furloughed.

The team have managed to significantly catch up on outstanding work allowing us to return to pre-covid performance. This combined change of circumstances and new claims Q2 results is credit to the effort the team has put in to make sure people have access to the support both with their rent and Council Tax that vulnerable residents need at this difficult time. In Q2, the number of working days to process new claims sat at 4.7. This is much lower than the year end success target of 7 days which is positive. Over the last two quarters, there has been a significant number of claims and standard workload has increased.

Year End Success: 7 working days

RISK

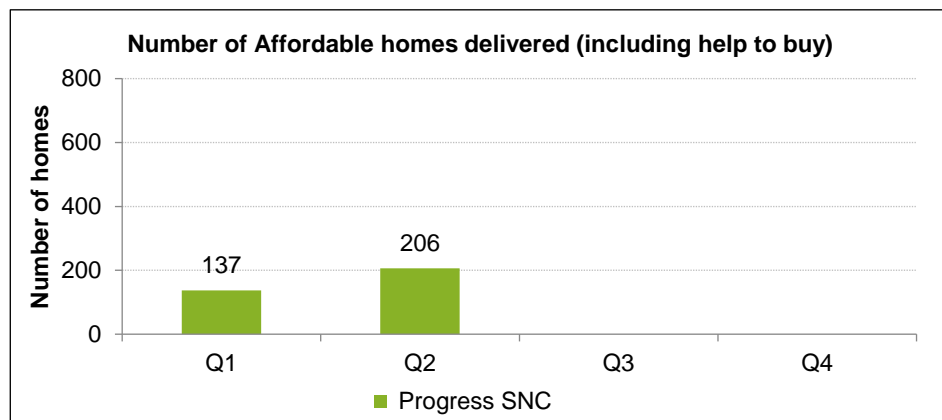
This measure was put in place before we were aware of the impact of the pandemic on the Council, particularly relating to hardship support. The team will continue to prioritise new claimants, but this is a measure that may continue to slip as we cope with unrepresented demand. Resources will continue to be monitored so that we are in the best position we can be to meet this demand.

CONTEXT

The year-end success set by the Council is an internal standard.

Nationally the Department for Works and Pensions do not set any targets for paying claims, only that we are within authority error limits which they set. However, we maintain our own target as it's important to the Council that we pay promptly to residents who are in need, and therefore helping to reduce the financial pressure on our residents who need help.

Number of affordable homes delivered (including help to buy) (Measure reference 21)



COMMENTS

During Q2, 39 homes were completed by housing associations, all through S106 agreements with developers. In addition, 30 sales through Help to Buy (equity loan) were reported. We are on course to achieve the annual number of affordable homes needed, as evidenced by the Strategic Housing Market Assessment, within the current financial year.

Year End Success: Sufficient affordable housing to meet the needs of residents in accordance with the Strategic Market Assessment

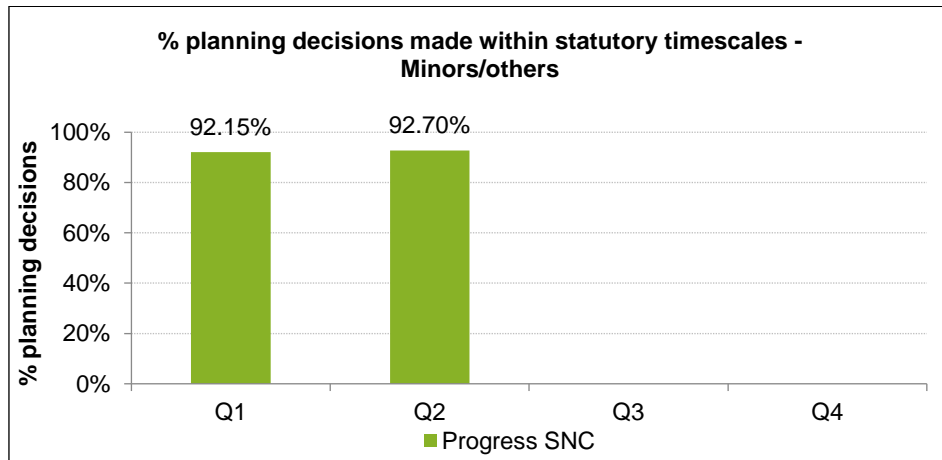
RISK

COVID-19 caused delays in the construction of affordable homes. Most sites in South Norfolk are showing a 2-3 month delay in delivery and the assumption is that this may be for all housing delivery within the district – not just affordable housing. Delivery on the smaller sites within the district may be particularly impacted by COVID-19 as some of the smaller housebuilders have suspended work for longer than the bigger sites.

CONTEXT

Affordable Homes completions by housing associations for the first half of 2020/21 have been about half those of the previous year with just 59 compared to 122 at end of Quarter 2 2019/20. This is mainly because we have now passed peak delivery of sites as allocated in the Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS), but partly because of delays caused by Covid-19. The delays related directly to Covid-19 are estimated at 15.

% of planning decisions made within statutory timescales – minors/others (Measure reference 23)



COMMENTS

Quarter 2 figures relates to 254 out of 274 applications (92.7%). 208 applications were determined in the statutory time period of 8 weeks and a further 46 were determined in an agreed extension of time.

The national average for "Other" applications determined in 8 weeks or agreed time limit for Q2 in 2019 was 89%.

We are now measured as part of a national measure for a rolling 2 years performance. If we fall below the national measure of 70% we will have special measures introduced. Our current rolling 2 year performance for minors/others is 93.4 %, which against the national target of 70% is good, and as such the Authority is not at risk of special measures.

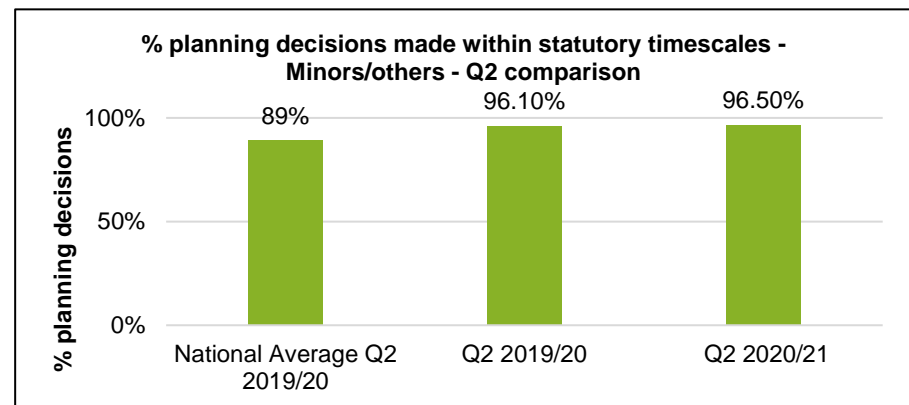
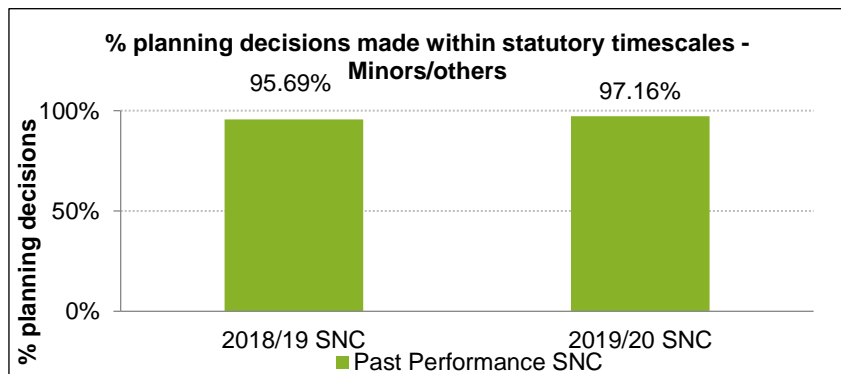
Year End Success: 90% minors/others in agreed time

RISK

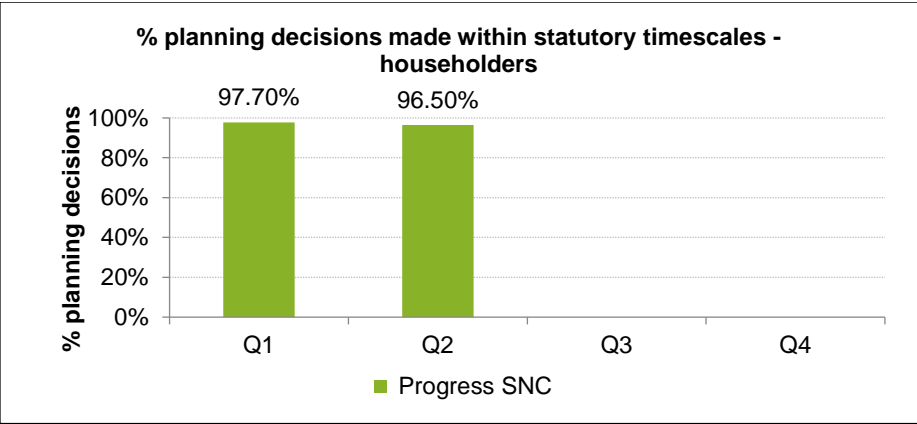
We are currently meeting our internal target, and exceeding the national target of 70%, so there is no risk.

CONTEXT

The below graphs provide comparative data for previous years and previous Q2 periods.



% of planning decisions made within statutory timescales – householders (Measure reference 23)



COMMENTS

This relates to 137 (96.5%) out of 142 applications. 124 (87%) were determined within the statutory time limit and 13 were determined within an agreed extension of time. 82 (58%) were determined in 6 weeks or less.

There has been a significant increase in the number of applications submitted compared to previous years, which together with delays associated with Covid-19 restrictions such as initial challenges of home working and delays in displaying site notices has resulted in a slightly lower performance.

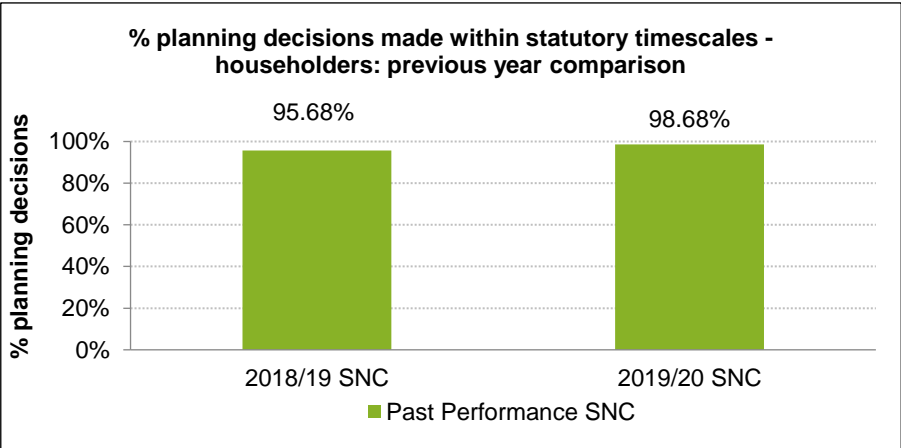
Year End Success: 95% of decisions

RISK

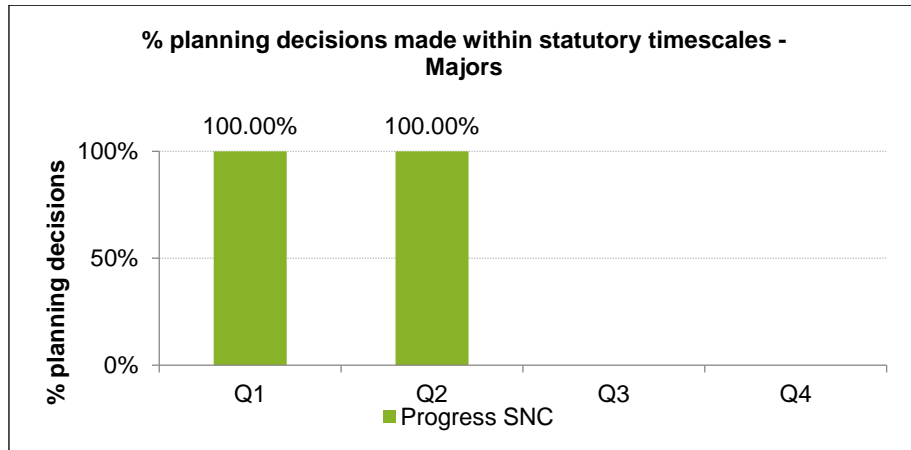
Although we are above our internal measure of success of 95%, success has not been as high as previous quarters partly due to remote working during Covid-19 and the ability to display site notices. This is unlikely to be longer term risks as new working practices are developed.

CONTEXT

The below graph provides comparative data for previous years.



% of planning decisions made within statutory timescales – majors (Measure reference 23)



COMMENTS

The quarter 1 figures relate to 223 out of 242 applications. 172 were determined in the statutory time period and 51 were determined in an agreed extension of time. The quarter 2 figure of 100% relates to 9 applications. 5 were determined within the statutory time limit of 8 weeks and 4 were determined within an agreed extension of time.

The national average for "Major" applications determined in 13 weeks or agreed time limit for Q2 in 2019 was 87%.

We are now measured as part of a national measure for a rolling 2 years performance. If we fall below the national measure of 60% we will have special measures introduced. Our current rolling 2 year performance for majors is 100%, which is against the national target of 60% means the Authority is not at risk of special measures

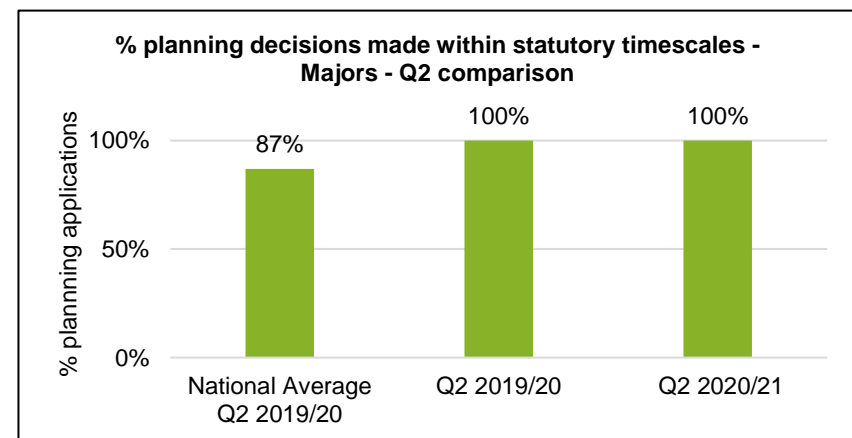
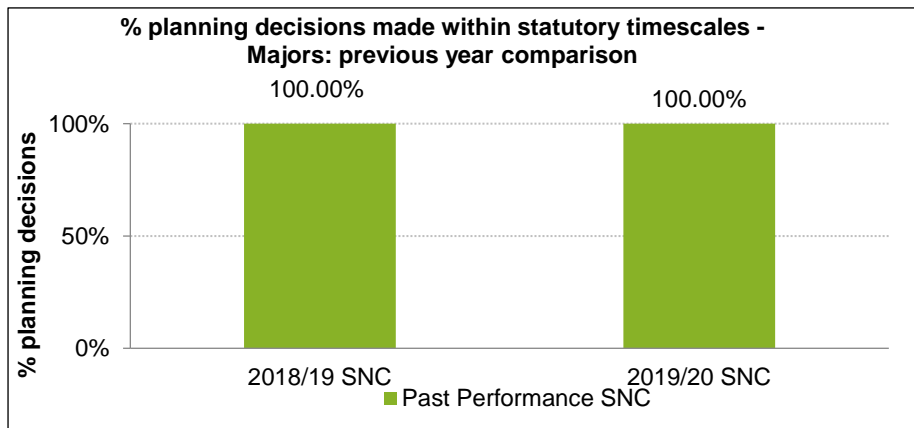
Year End Success: 95% of decisions

RISK

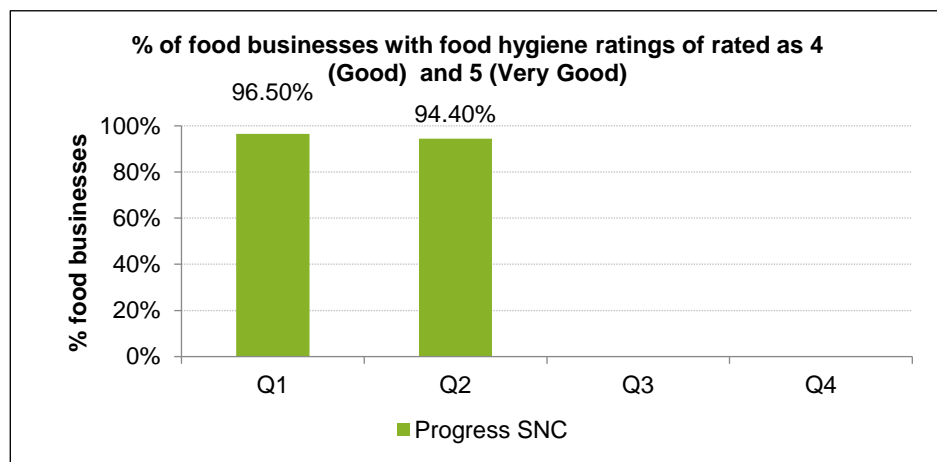
No risk.

CONTEXT

The below graphs show comparative data for previous year and Q2 period.



% of food businesses with food hygiene ratings of rated as 4 (Good) and 5 (Very Good) (Measure reference 24)



COMMENTS

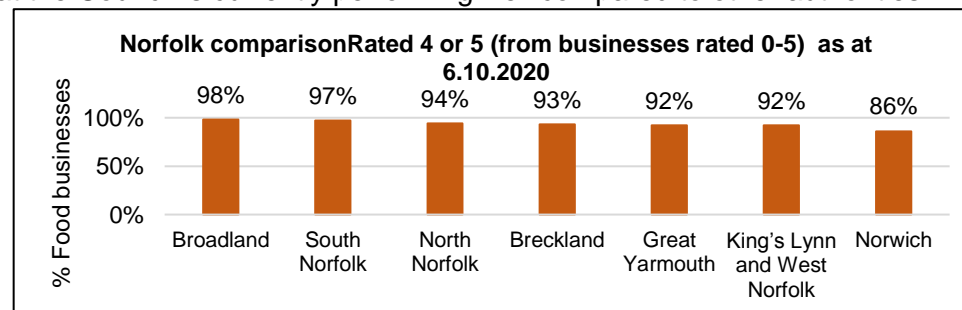
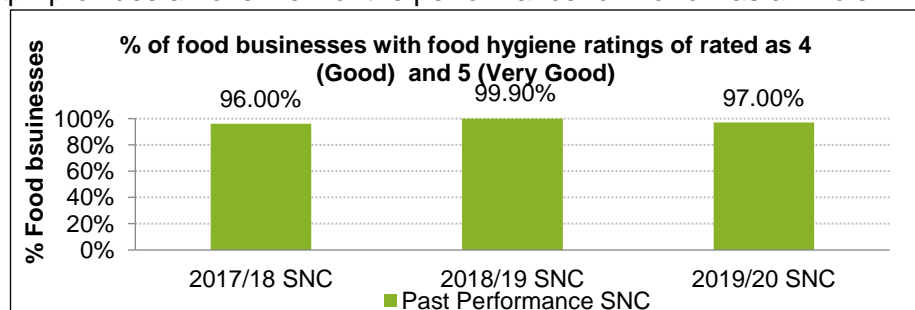
There is little change in the result, partly because food safety inspections leading to ratings could not be carried out between late March and mid-September. During Q2 the Food, Safety and Licensing Team has continued to focus on compliance with The Health Protection (Coronavirus, Restrictions)(No 2)(England) Regulations 2020, amendments and additional Regulations enacted to control transmission of the virus. Members of the team continue to actively collaborate in a multi-agency approach across Norfolk as we look to ensure that businesses are complying with the Regulations, protecting their employees and the public, and receiving the best advice possible to support this. Particular focus has been given to larger manufacturers providing preventative support and guidance, in conjunction with Public Health for both the manufacturing environment and also guiding social factors outside of the workplace. Contracted proactive support has been provided to food businesses in particular to discuss the importance of additional checks on reopening and compliance with food safety matters for those able or required to remain open. More recently routine food safety interventions have recommenced, prioritising the higher risk businesses.

Year End Success: Baseline RISK

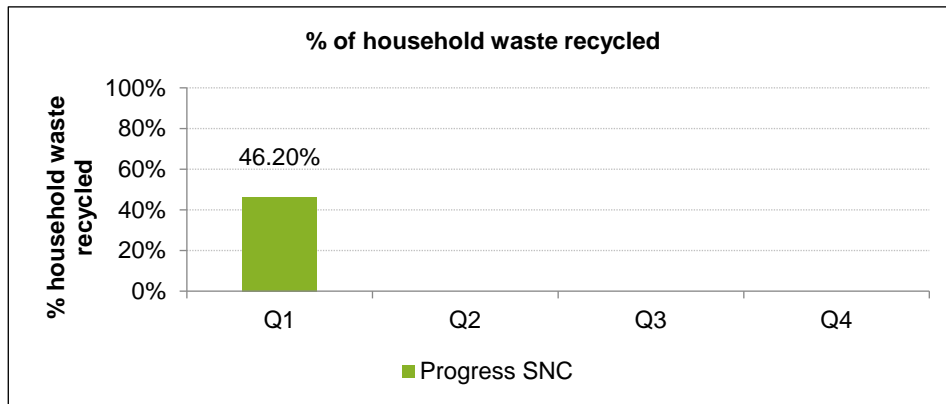
The food safety inspection programme has received attention from the FSA, as previously reported and the subsequent additional backlog in the routine food safety inspection programme 2020/21 is being reviewed. Food, Safety and Licensing staffing continues to be challenged by vacancies and maternity absences. A successful internal appointment has provided a net gain of 0.2FTE towards filling these vacancies. Filling vacant posts is now critical to performance and resilience within the team, additional capacity is likely to be required going forwards. The table below referring across Norfolk to the % of food businesses with a Food Hygiene rating of 4 or 5 provides some inter-authority comparable data. Please note that differences may reflect local geographic and economic circumstances rather than comparative regulatory performance.

CONTEXT

The graph below shows the previous year performance for the Council. This shows that the % is slightly lower in Q2 compared to full previous years. The second graph provides an overview of the performance for Norfolk as a whole. This shows that the Council is currently performing well compared to other authorities.



% of household waste recycled (Measure reference 26)



COMMENTS

Q1 data is showing an increase of nearly 4% on last years recycling rates.

Quarter 2 data will be available in January 2021 in line with waste data flow submissions. The team are currently undertaking research to understand the Best Practice from other Councils that have the highest recycling rates in England. This will be used to create a work programme that will focus on continuing to increase recycling, the success of the programme will be dependent upon resource available to carry out the work.

Year End Success: 2% increase

RISK

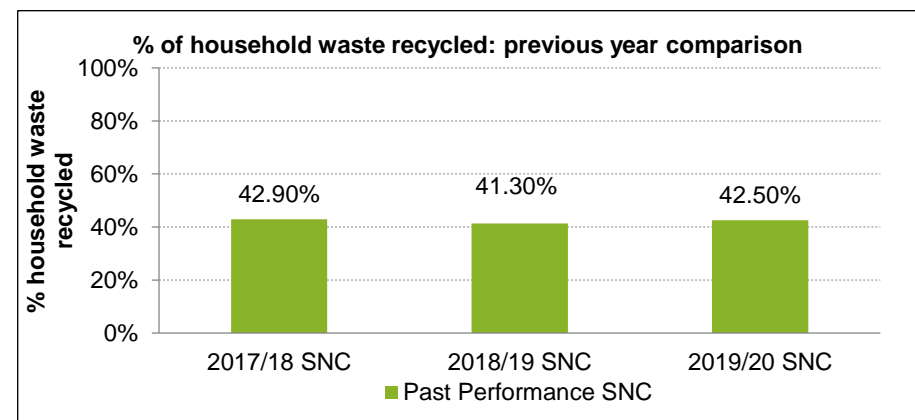
The Covid-19 pandemic has and continues to create uncertainty over future work programme of the recycling team, a large amount of work undertaken by the team involves community engagement and the monitoring of recycling bins, which has not been possible due to Covid-19. In addition, the consequences of the pandemic may in future impact recycling rates through increased contamination, the financial stability and availability of markets wanting to purchase the recycled materials. Note the overall recycling rate includes garden waste and this is heavily impacted by weather extremities. Potential future lockdowns may also change the waste composition collected impacting the recycling rate.

CONTEXT

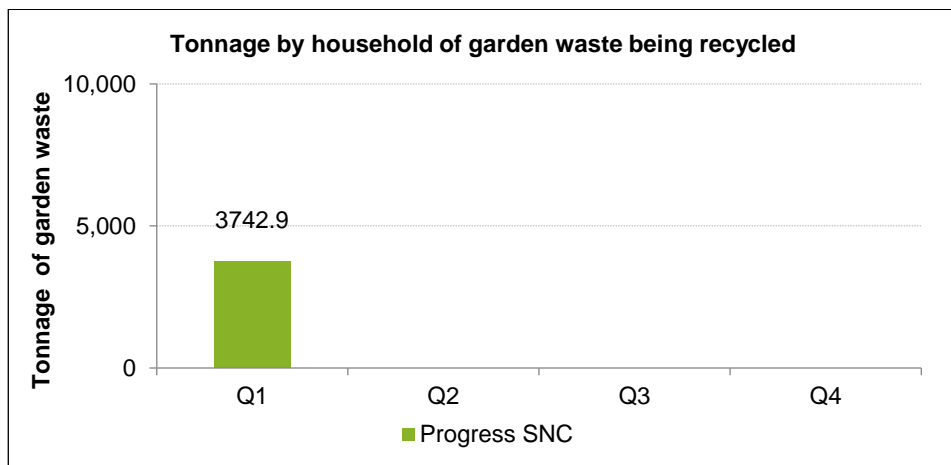
The graph to the right shows the annual % of household waste recycled in South Norfolk for the previous financial years.

On average across England, in 18/19, the annual recycling rate of household waste was 44.7%. This is slightly higher than the average for South Norfolk in comparison.

Source: Department for Environment, Food and Rural Affairs, ONS



Tonnage by household of garden waste being recycled (Measure reference 27)



COMMENTS

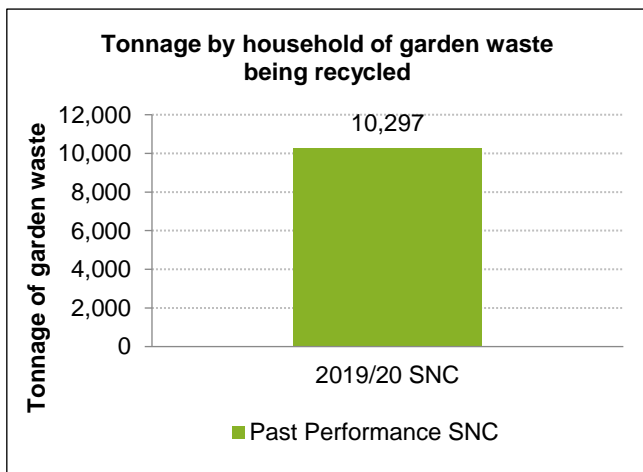
The Q1 data for 2020/2021 is 302.16t higher in comparison to the same period for 2019/2020. This will be due to more customers subscribing to the garden waste service and Q1 coinciding with good weather and the national lockdown due to the pandemic. Lockdown created a change in behaviour with more residents being at home and doing gardening/ home improvements. The team are currently undertaking research to understand the Best Practice from other Councils that have the highest recycling rates in England. This will be used to create a work programme that will focus on continuing to increase recycling, the success of the programme will be dependent upon resource available to carry out the work. The team are currently undertaking research to understand the Best Practice from other Councils that have the highest recycling rates in England. This will be used to create a work programme that will focus on continuing to increase recycling, the success of the programme will be dependent upon resource available to carry out the work.

Year End Success: Increase in tonnage

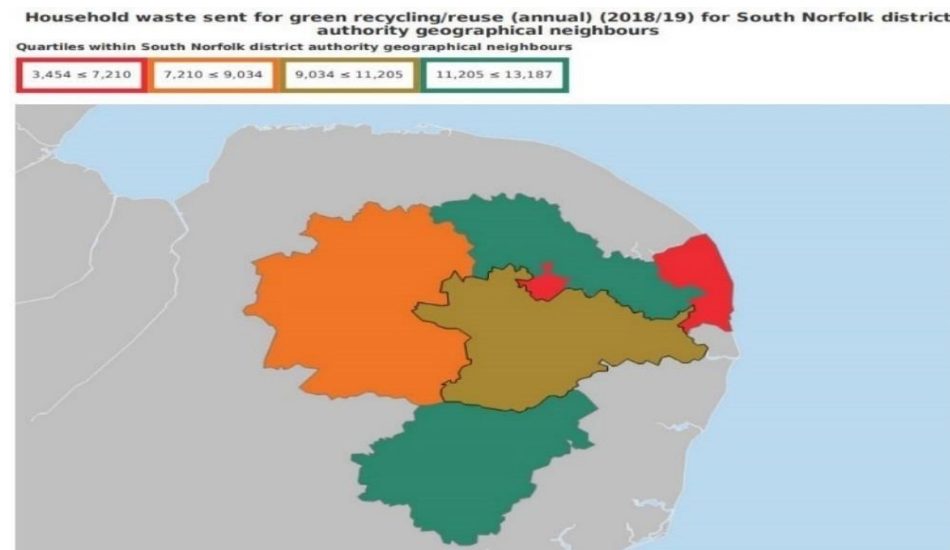
RISK

Garden waste is heavily impacted by weather extremities and new customers subscribing to the service. The quarter 1 data has also shown how factors connected to lifestyle changes with the lockdown can also influences garden waste tonnage collected.

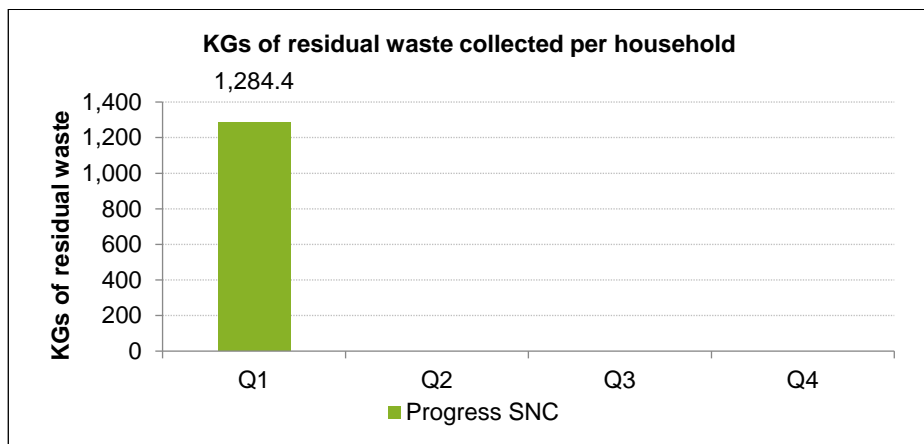
CONTEXT



The graph to the left shows the past performance of South Norfolk for household garden waste being recycled by tonnage. In comparison with neighbouring authorities, the latest information shows that South Norfolk is in the mid-quartile when it comes to the amount of garden waste being recycled/reused. This can be seen in the map to the right. Source: Department for Environment, Food and Rural Affairs



KGs of residual waste collected per household (Measure reference 28)



COMMENTS

The quarter 1 data 2020/2021 indicated an increase in the amount of residual waste collected per household. This could be due to residents being at home more and naturally producing more waste, additionally the lockdown resulted in some residents having more available time for potential clear outs. The current pandemic is ongoing, and the surrounding uncertainty may result in more residents staying at home throughout the year resulting in more waste being produced per household

The quarter 2 data will not be available until January 2021 after it has been submitted and checked by Waste Data Flow.

This data will be provisional until the dwelling stock number is updated in waste data flow. This will be around October 2021 when the district value figure is released.

Year End Success: Decrease in KGs of residual waste collected per household

RISK

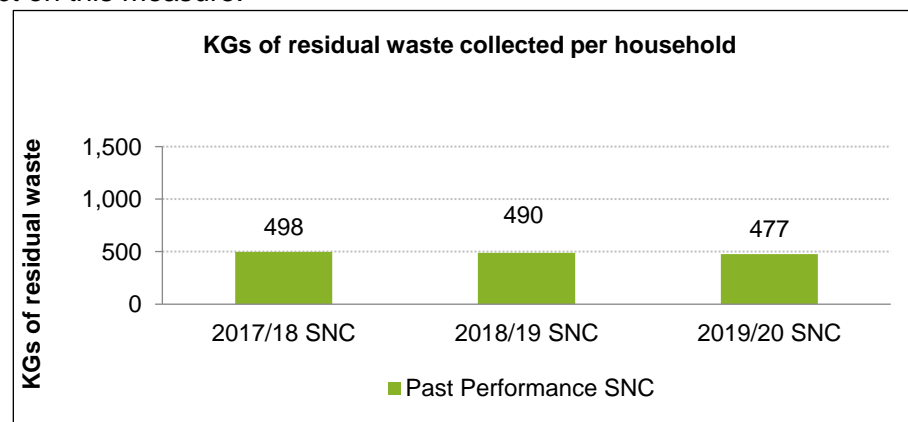
It is likely the Covid-19 pandemic and residents' behaviour will have a negative impact on this measure.

CONTEXT

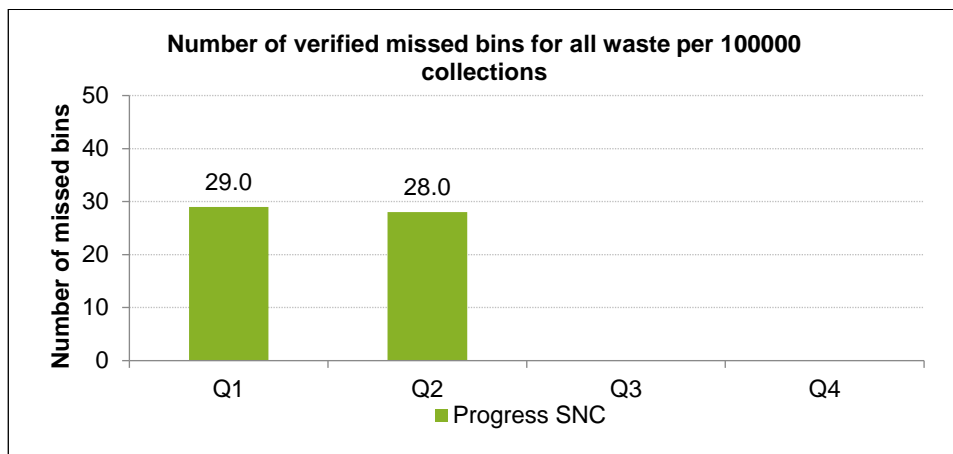
The graph on the right shows the previous year comparisons for the KG's of residual waste collected per household. This shows that year on year, the figure for South Norfolk has been decreasing.

Nationally, there has been a decrease in waste from households, with England being responsible for the vast majority of waste, generating a total of 22 million tonnes (83% of the UK total) in 2018. Alongside this, there has also been a decrease in the national recycling rate.

Source: Department for Environment, Food and Rural Affairs



Number of verified missed bins for all waste per 100,000 collections (Measure reference 29)



COMMENTS

The missed bins figure remains relatively stable with the service displaying an overall continual improvement.

The risk of limited access issues due to increased home working has not been as significant as first envisaged.

Year End Success: No more than 30 missed bins per 100,000 collected

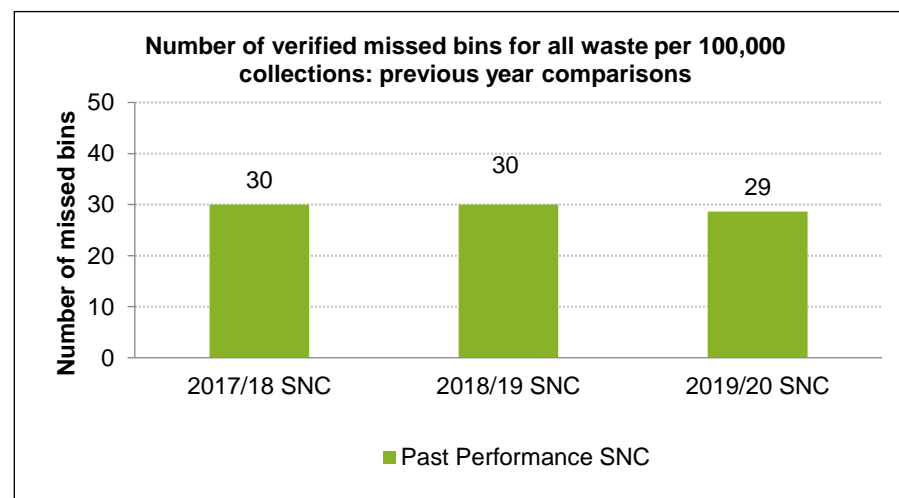
RISK

Due the Covid-19 pandemic with more households being at home and cars parked on the side of the road there have been difficult in some areas with RCV being able to gain access, this has not however, impacted upon the number of missed bins recorded as the number has reduced slightly.

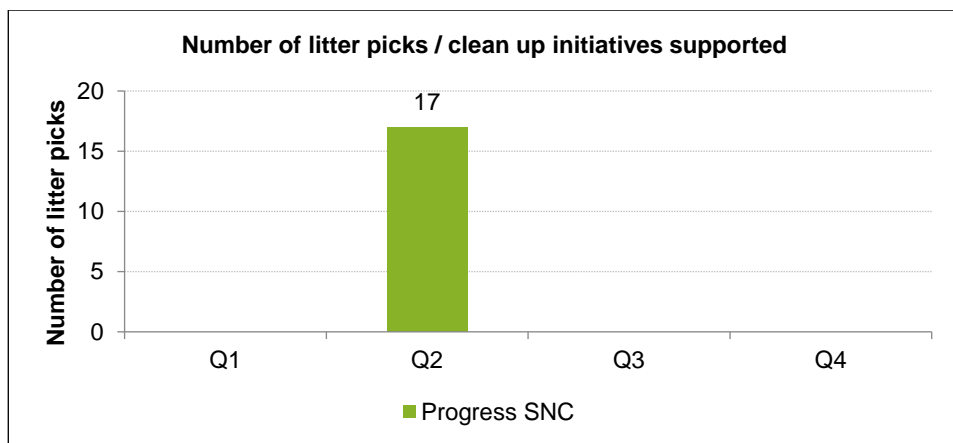
CONTEXT

The graph on the right shows the previous performance for South Norfolk Council on number of missed bins per 100,000 collected.

This shows that the number has been fairly consistent over the previous years, with a slight decrease in the last financial year.



Number of litter picks / clean up initiatives supported (Measure reference 30)



COMMENTS

The Big South Norfolk Litter Pick scheme was re-started in September (having been suspended since March) to coincide with the Great British September Clean initiative (Organised by the Keep Britain Tidy Group) which ran nationally from 11th to 27th September.

Due to the prevailing Covid-19 guidance on social distancing and the uncertainty around further restrictions, the scheme was not widely promoted, rather the focus was on contacting groups and parishes that have previously taken part. The low take up may suggest a degree of nervousness by residents towards meeting in groups and also some scepticism as to whether planned events would proceed.

Year End Success: Baseline

RISK

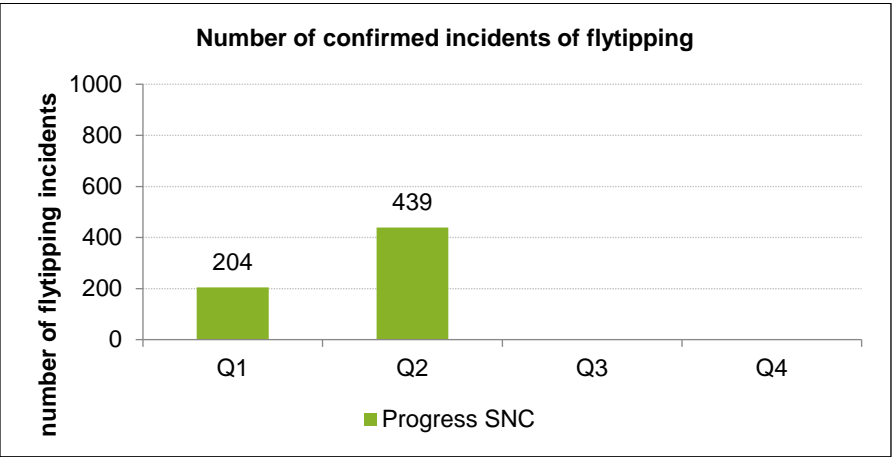
We know from previous experience that, as we move into the autumn and winter months, with shorter days and potential for adverse weather, the demand for community litter picks falls away. We will review the prevailing Covid-19 situation early in the new year with a view to deciding on how best to proceed with promoting community litter picking during 2021.

CONTEXT

We are not aware that litter picking activity is recorded nationally. However, we aim to do some desk research in the coming months to determine whether comparable litter picking data is available either locally (other Norfolk LA's) or nationally.

We know that the Big South Norfolk Litter Pick has been very successful over the last five years, most recently (2019/20) attracting some 100 groups. There is an appetite amongst residents for community engagement of this nature.

Number of confirmed incidents of fly tipping (Measure reference 31)



COMMENTS

Comparing the current quarter 2 figure of 235 confirmed fly tips to the same quarter in 2019/20 shows an increase of some 73 fly tips. In part, this may be accounted for due to the temporary closure of the County Council Household Waste Recycling Centres for a number of weeks.

We may also be seeing some behaviour change in that residents are spending more time at home, exercising in their local area and perhaps more likely to see and report incidents of fly tipping. In a similar vein, residents have had more time to 'clear the clutter' and or carry out DIY and the subsequent waste may not always have been disposed of correctly.

Year End Success: Baseline

RISK

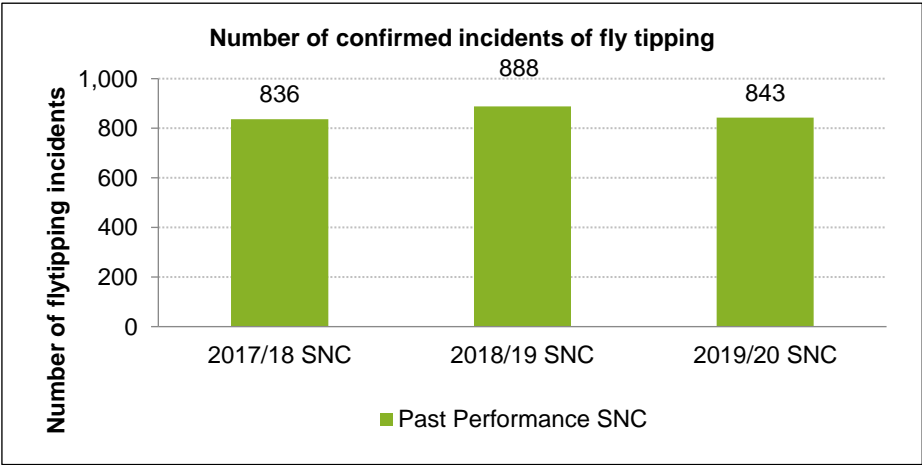
The County Council has now re-opened all 20 Household Waste Recycling Centres (HWRC's) in Norfolk (there are some changes to how the sites operate). So, residents now have the option of using the HWRC's.

CONTEXT

The graph to the right shows the number of confirmed fly tipping incidents in South Norfolk for previous years. As can be seen, the number of incidents slightly increased between 2017/18 and 2018/19 and then reduced in 2019/20.

As of 18/19 (latest comparable data), South Norfolk had the third lowest rate of fly tipping incidents compared to the rest of Norfolk.

Source: Department for Environment, Food and Rural Affairs



ANNUAL DELIVERY MEASURES

There are a number of measures outlined in the Delivery Plan for 2020/21 which are reported annually to Cabinet. These measures will be brought through as part of the Q4 reports. The measures are:

- Collection rate of Council Tax (an update has been provided as part of the Q2 report, but a full update will be provided at Q4 on the annual collection rate) – measure reference 7
- Collection rate of Business Rates (an update has been provided as part of the Q2 report, but a full update will be provided at Q4 on the annual collection rate) – measure reference 8
- Number of new jobs created – measure reference 7
- Employment rate – measure reference 10
- Those in employment claiming benefits – measure reference 11
- Business survival rates – measure reference 13
- Number of new homes delivered – measure reference 22

APPROVAL OF REVISED UK MUNICIPAL BOND AGENCY'S FRAMEWORK AGREEMENT

Report Author(s): Debbie Lorimer
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Portfolio: Finance and Resources

Ward(s) Affected: All

Purpose of the Report:

This report seeks approval for the Council to enter into a revised Framework Agreement with the UK Municipal Bonds Agency (the "Agency").

Recommendations:

Cabinet is recommended to:

- a) agree the Council enters into the revised Framework Agreement with the UK Municipal Bonds Agency.

1 SUMMARY

- 1.1 Although the Council has no immediate need to borrow externally, it is party to a Framework Agreement which enables it to access funding from the Agency, if and when required.
- 1.2 The Agency has revised its Framework and Cabinet is asked to review these changes to ensure it is satisfied with the new terms, and to approve the Council's entry into the revised Agreement to enable the Council to access this form of borrowing in the future without delay.

2 BACKGROUND

- 2.1 The Local Government Association established the UK Municipal Bonds Agency plc to reduce the cost of councils' debt financing. The Revised Business case outlined that the key benefits for local authorities were:
 - Savings due to lower interest rates
 - Protection from changes to the PWLB's terms and conditions and diversified funding sources
 - Fully transparent pricing
 - Tailored products to suit local authorities' needs
 - Economies of scale thereby reducing costs
- 2.2 On 26 March 2016, Cabinet resolved to approve the Council's entry into the Agency's Framework Agreement and its accompanying schedules including a joint and several guarantee. This guarantee, in practice, meant that all borrowers would be collectively and individually guaranteeing the lenders to the Agency against a default by a local authority, although the risk to the Council was deemed to be low.

3 CURRENT POSITION

- 3.1 Since the Cabinet approval in March 2016 the Municipal Bonds Agency has reviewed the requirement for a joint and several guarantee for pooled loans of £1 million or more for maturities greater than one year. As a result, the Agency has revised its Framework to replace the joint and several guarantee with a proportional and several guarantee structure.
- 3.2 This guarantee is proportional and several:
 - A guarantor is liable for a share of any default, which is proportional to its share of the total pool of loans allowing for the default e.g. if an authority's borrowing totals 1 per cent of the pool following a default, it will be liable for 1 per cent of the default.
 - "Several" means an authority can only be held liable for its specific obligations, not those of others. This prevents bondholders using the

- guarantee to single out a council or small group of councils to cover a default by another council.
 - An authority that has no outstanding loans to the UKMBA is not liable under the proportional guarantee.
- 3.3 To date no UK local authority has ever defaulted on a loan. This dates back to the granting of a Royal Charter to the Corporation of London in 1067.
- 3.4 The proportional guarantee is in favour of those providing finance to the UK Municipal Bonds Agency and its Special Purpose Vehicles. The guarantee does not cover any other expenditure of the UK Municipal Bonds Agency or its Special Purpose Vehicles i.e. running costs such as salaries, service charges and rents are not covered by the proportional guarantee.
- 3.5 The proportional guarantee is markedly different to that previously required by the UK Municipal Bonds Agency and as set out in its business case:
 - The guarantee as part of the Agreement can be signed by a council without the council being immediately liable to pay out if the guarantee were called upon because its proportion of the loan book would be zero.
 - An authority that has borrowed from the Agency and has repaid all its loans has no liability under the guarantee because a council's proportion of the loan book would be zero. No local authority needs to be concerned that it may have many years exposure under the proportional guarantee even if it has repaid its loans.
 - The liability under the guarantee is subject to a cash limit equal to the total amount borrowed by a council. This puts a ceiling on the liability of a council under the guarantee if there were a significant number of defaults by local authorities. It should be noted that any liability under the proportional guarantee is in addition to the amount a local authority has borrowed from the UK Municipal Bonds Agency.

The proportional guarantee is “unconditional” and “irrevocable”. This means:

- A council is unable to impose additional conditions before it pays out if the Proportional Guarantee is called upon.
 - A council cannot revoke its guarantee while it has loans outstanding from the UK Municipal Bonds Agency. This prevents a council from benefitting from a lower interest rate when it borrows and then walking away from the obligation that delivered that benefit.
- 3.6 The change to a proportional guarantee decreases the risk to the Council should it decide to borrow from the Municipal Bonds Agency.
- 3.7 For Member's awareness the Agency also now offers two other forms of lending which are outside of the proportional guarantee structure:
 - Standalone loans to a single local authority for £250 million or more for maturities greater than one year. These loans are guaranteed solely by the borrower, who must obtain an external credit rating from one or more of the

major credit rating agencies. The local authority would still be required to enter into the Agency's Framework Agreement.

- Short term, pooled loans, outside of the proportional guarantee for maturities of less than one year. To enable local authorities to enter into short term loans without needing to follow lengthy governance processes, the Agency will use a separate loan agreement for those loans.

4 PROPOSED ACTION

- 4.1 Members are asked to note the change to the guarantee as explained in section 3 above and to delegate to Officers the signing of the revised framework agreement.

5 ISSUES AND RISKS

- 5.1 The revision of the guarantee from a joint and several to a proportional and several one reduces the risk to the Council should a borrower within the pooled loan default. Previously the Council could have been held liable for the total value of the amount defaulted even if it had repaid its own loan. This liability would have lasted until the final authority within the pooled loan had all their repayments.

6 CONCLUSION

- 6.1 The revisions to the existing Agreement which was approved by Cabinet in 2016 replaces the joint and several guarantee in favour of a proportional guarantee. This effectively reduces the risk to the Council as instead of it being obligated to collectively and individually guarantee the lenders to the Agency against a default by a local authority, it limits the liability to an amount proportional to its outstanding loan. Signing the revised Agreement in advance of borrowing will allow the Council to borrow from the Agency at short notice going forward.

7 RECOMMENDATIONS

- 7.1 Cabinet is recommended to:
- a) agree the Council enters into the revised Framework Agreement with the UK Municipal Bonds Agency.

Background Papers

Cabinet Paper 21 March 2016 Approval of UK Municipal Bond Agency's Framework Agreement and Joint and Several Guarantee

THE VISION FOR A BEST IN CLASS HOUSING OFFER AND DRAFT ALLOCATIONS SCHEME

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Portfolio:

Better Lives

Ward(s) Affected:

All

Purpose of the Report:

- To present findings from the review of two service areas within the Housing and Benefits team; the redesign of an Interim and Temporary Accommodation pathway and developing a best in class customer journey to sustainable Social Housing tenancy
- To provide an overview of the vision for a new service model
- To seek comment from the panel in relation to the draft Allocations Scheme prior to presentation at full Council

Recommendations:

1. Cabinet to note and comment on the findings of the final project report and recommend full Council endorse that Officers work towards the Best in Class Housing model.
2. Cabinet to recommend to Council adoption of the Allocations Scheme

1 SUMMARY

- 1.1 In bringing together one Housing & Benefits team an opportunity arose to review the Housing and Homelessness Service, referred in the report as Housing Service. This would enable the Council to develop an efficient and consistent working approach which in turn ensures that residents receive the best possible and coordinated service. In addition to this, a review and update to the Allocations Scheme by which local authorities detail the process for determining priorities and for defining the procedures to be followed in allocating housing accommodation was necessary as one had not been undertaken since 2018. Furthermore, the worldwide outbreak of COVID-19 gave an additional impetus to the review process to ensure that the Council can offer a model of a housing service that is best placed to meet the noted and expected increase in demand.
- 1.2 To provide an impartial and nationally informed viewpoint and added value to the review process, an external consultant, Campbell Tickell was engaged. These services were procured following a successful bid to the Local Government Association's (LGA) Housing Advisor Programme. As part of the review process, the consultants worked with the internal officer group and a Joint Member Working Group (JMWG).
- 1.3 The findings from the review highlighted that although the Council achieves good outcomes through the prevention or relief of homelessness, it is mainly through an offer of social housing. The findings made clear that this model is unsustainable in the future, particularly in a COVID-19 landscape. A change in approach is required, one that seeks to enable quicker actions by our residents in identifying their housing need, supports those who needs it most and secures the best possible use of resources through the alignment of the Housing Service.
- 1.4 A Best in Class Housing Offer has been developed based on those findings and is outlined at section 5 below. It should be noted that the proposals are for members to note and comment on the direction for the new Housing service at this point in time. The proposals also help to frame the context of the draft Allocations Scheme which we are seeking to take forward to full Council for approval and adoption.
- 1.5 The Allocations Scheme is the cornerstone of the Best in Class offer, it is also a document we have a statutory duty to produce and to keep up to date in line with current legislation, case law and best practice. Further detail can be found in section 5 of the report and the Draft Allocations Scheme at Appendix B. However, there are proposed changes in process for:
 - Qualification Criteria for the Housing list
 - A proposed Hybrid model for the Allocation of Social Housing
 - The Priority Bands for households on the housing list
 - A single point of access to the Housing service and the schedule of allocating properties

- 1.6 Finally, the LGA funding requires that the Council prepares a project case study that will be available on the LGA website. This is an opportunity for the Council to share the learning and outcomes from the collaborative working of the JMWG and the desire to develop an innovative and sustainable approach to post COVID-19 Housing and Homelessness services.

2 BACKGROUND

Housing Allocations Schemes

- 2.1 Housing Authorities are required to have an allocation scheme for determining priorities, and for defining the procedures to be followed in allocating housing accommodation. Housing Authorities must allocate in accordance with that scheme and all aspects of the allocation process must be covered.
- 2.2 Best practice dictates that allocations schemes should be reviewed every 1-2 years to take into account changes in legislation, such as the Homelessness Reduction Act 2017 or case law and to be reactive to any reviews, case law or complaints received. This ongoing process of review should allow for housing systems to adopt and build on local and national best practice, good policy housekeeping and remain current to the local environment. The Allocations Scheme for South Norfolk was last reviewed in 2018.
- 2.3 In respect to the Allocations Scheme, although the policy has allowed the Council to meet the aims of the team, it is intrinsically complicated which in turn prompts additional demand to the service mitigating the team's ability to further prevent new customer concerns. The new Allocation Scheme simplifies matters so that they are easier to understand from a customer and officer point of view, allowing explanations relating to eligibility and priority to be both communicated and understood to a greater extent thus avoiding unnecessary contact. This releases further resource to focus on the proactive work that avoids customers facing far more difficult issues
- 2.4 From a customer interaction point of view, the new systems and procedures that are explained in this report allows the team to achieve many of the aspects we have tried to do. The challenge has been the piece meal approach the Council has had to take as each new challenge arises. This new co-ordinated approach will allow the Council to provide clear early guidance to customers so that they are empowered to make suitable life decisions to better their housing situation
- 2.5 The Housing teams for Broadland and South Norfolk have a previous history of working collaboratively to deliver successful strategies and services to prevent homelessness, for example, through the Greater Norwich Homelessness Strategy (now in its 4th iteration) and the MHCLG funded First Step service dedicated to identifying, supporting and preventing rough sleeping operates across both districts.

The Housing Advisor Programme

- 2.6 The Local Government Association's (LGA) Housing Advisor Programme (HAP) supports Councils seeking to explore solutions in meeting the housing needs of their communities. There is a particular focus on encouraging learning and innovation, particularly in terms of where that learning can be shared nationally as examples of good practice.
- 2.7 The support provided by LGA programme is through the granting of funding to procure external advisors in order for local authorities to take their projects forward. In September 2019, the Council in a joint bid with Broadland, were successful in their bid to the programme and secured just over £49,000 in funding. With this funding the Council had a fantastic opportunity to capitalise on the added value offered by the funded external consultants in meeting the need to update the allocations scheme and the introduction of the new staffing structure within the Housing team to develop an offer that will:
- Meet the right of all people in South Norfolk to realistic and expanded housing options.
 - Enable people to resolve their own housing needs where possible by promoting 'resilience', 'self-help' and emphasising their 'rights and responsibilities'
 - Ensure the protection of vulnerable individuals and households who need additional assistance in resolving their housing problems
 - Provide seamless solutions and support through cross agency working
- 2.8 In addition, a conditional requirement of the funding is for participating local authorities to prepare a case study for the end of the funding period which will be published on the LGA website. This provides an opportunity for South Norfolk Council to demonstrate the customer-focused and forward thinking approach displayed both during, and beyond the life of the project and showcase the Council as an exemplar of innovative practice.
- 2.9 Following a robust procurement process in early 2020, officers were pleased to appoint Campbell Tickell as our consultants of choice. They have extensive experience working across a variety of housing and homelessness related projects and their bid demonstrated real innovation in securing solutions.
- 2.10 As external advisors, Campbell Tickell were key to the project and provided an impartial and nationally informed viewpoint coupled with a background of innovative thinking when developing customer solutions, partnership working and operating across public/private sectors. Additionally, as part of the project team, they engaged with a number of stakeholders including customers, staff, members and housing providers,
- 2.11 To achieve this, Campbell Tickell worked with the Council in two key areas:

Exploring the redesign of an Interim and Temporary Accommodation (TA) Pathway

- 2.12 The Council has a well-developed TA offer which includes the provision of support to those in TA. This support ensures that those in TA are able to not only sustain their current accommodation but also to access wider support such as benefits/employment support and health services so that they are ready to enter and sustain more permanent accommodation.
- 2.13 The review process explored the TA offers at Broadland and South Norfolk Councils and opportunities for alignment. This would enable the Council to increase capacity to place people in TA only when necessary, ensuring it is right for their needs and offers the right support necessary. It was also felt that there was scope to go much, much further and in this respect, the LGA funded consultants worked with the Council and consulted key stakeholders including other Norfolk Local Authorities to identify innovative solutions, including the potential to work across boundaries to secure scale, efficiency and positive outcomes for vulnerable residents. The TA review considered the following areas:
- Exploring opportunities within the Council's current offers which will enable officers to best manage voids and risk while offering further options to customers at times of need, including the alignment of procedures, budget management and universal access to all eligible residents to our collective offer.
 - Investigating funding options to ensure the Council can achieve best value for money and develop a sustainable growth model to ensure income can be reinvested into support provision
 - Explore how the project can develop solutions with partners beyond the boundaries of the two Councils to deliver a ground-breaking and exceptional TA pathway.
 - Embedding within the Council's offers, the provision of accommodation for those who are rough sleeping as part of the First Step service.

Redesign of a Social Housing System

- 2.14 A desire of the project was to create a social housing system that simplifies and improves the customer journey through the housing list, but also ensures that whatever form of housing is offered, that this is the most appropriate and sustainable housing option for them. The review explored the following areas:
- A comprehensive review of current policy and processes
 - Created understanding around customer demand, need, aspirations, responsibilities and resilience

- Barriers to accessing and maintaining the right housing at the right time
- The delivery of recommendations for a pathway that increases choice for the customer and creates the best opportunities for sustainable tenancies

A Joint Member Working Group (JMWG)

- 2.15 In addition to Campbell Tickell, an internal project team was assembled to take this work forwards to a point of being able to offer a preferred model for both housing allocations and temporary accommodation. However, active Member involvement was vital to the success of the project not only in terms of engagement and providing input into the review but also knowledge of issues at ward level. An informal JMWG, while having no decision making capacity, was the preferred means of ensuring good member engagement and challenge in the project
- 2.16 The South Norfolk cohort of the JMWG consisted of one Liberal Democrat and three Conservative members to ensure cross-party representation and including both the Portfolio Holder for Better Lives and the Chair of the People & Communities Policy Committee.
- 2.17 The group attended a series of workshops enabling them to engage with the different stages of the project and to build a shared consensus of the principles and structure of the new housing offer. The group:
- Reviewed and agreed the overarching design principles
 - Highlighted strengths and weaknesses of current service access pathways
 - Helped to scope and agree key elements of the target pathway definition
 - Reviewed key aspects of the proposed service model as a precursor to formal consideration within the committee structure.

Design Principles

- 2.18 At the beginning of the project, the overarching design principles, the values that act as the benchmarking steer towards achieving the desired outcomes of the project, were reviewed and agreed by Campbell Tickell, the internal project team and the JMWG:
- To provide tailored accommodation solutions based on insight and evidence needs
 - Offer choice to our customers to meet individual needs
 - Promote self-reliance, enabling people to move-on and add value to people's lives

- Be sustainable and free resources to fund housing objectives
 - Be compliant, with robust business processes and systems.
- 2.19 The review completed by Campbell Tickell provided invaluable feedback regarding the housing service. It was great to see the positive feedback regarding the service however the constructive feedback has provided the Council with an opportunity to relook at the service, especially from an allocations point of view but also from a customer interaction.
- 2.20 Campbell Tickell have produced a comprehensive final report which can be found at Appendix A. Key aspects of the report including the findings of the Baseline review and the proposals to take the service forward are considered in the sections below.

COVID-19

- 2.21 The outbreak of COVID-19 in early 2020 and the subsequent lockdown measures brought about a significant step change in the operational aspect of the Housing Team, where working from home and offering video and telephone appointments became the new normal. At the same time demand on the service rose to unprecedented numbers. The team have risen quickly to the challenge and have worked at a level above and beyond. Further information on this demand can be found at 3.2.
- 2.22 From a long term perspective, the uncertainty around the future due to the COVID-19 outbreak means that the review of the housing service had come at the worst but also the most opportunistic time. The impact of COVID-19 and how we will meet demand is explored further throughout this report.

3 CURRENT POSITION

- 3.1 The diagram below provides details of the current housing list for South Norfolk Council. As of 11th September there were a total of 804 households seeking an allocation of social housing. The average time spent on the list is approximately 2-6 months dependant on an applicant's circumstances and housing need.

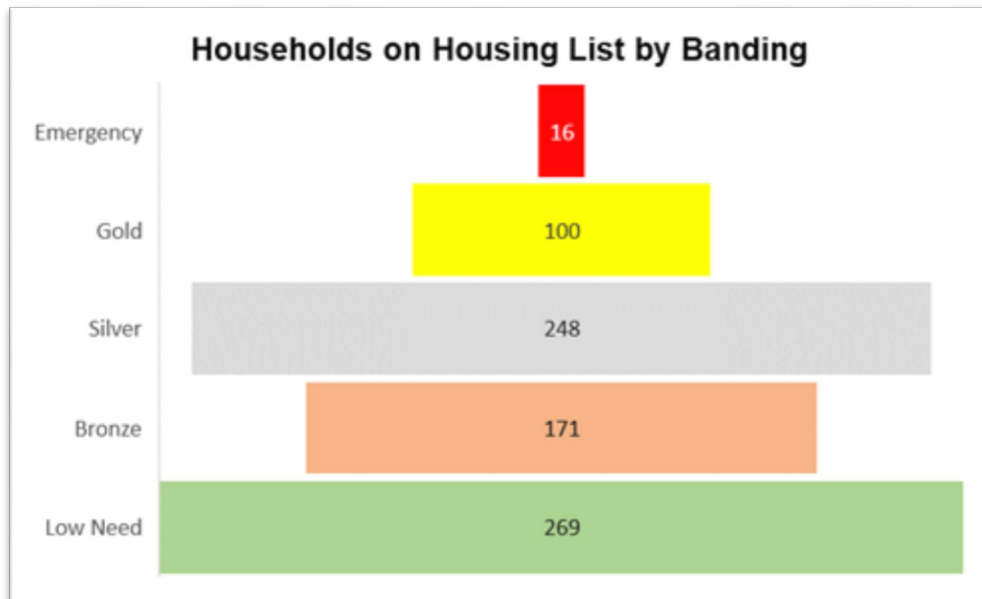


Figure 1: Households on South Norfolk Housing List

COVID-19 Impact on Demand

- 3.2 COVID-19 has presented the team with unprecedented challenges, far greater than that experienced during the economic recession in 2008. COVID-19 has impacted people from all socio-economic groups meaning each and every call differs in nature with some requiring support to downsize within the private sector, some needing advice regarding mortgage payments and others no longer being able to sustain within the private sector and so requiring assistance within the social housing sector. To add to this a far greater number of the people accessing the service have not required this kind of assistance before meaning their knowledge of the sector, time constraints and requirements are not understood making many phone-calls and in turn case management far longer than usual.
- 3.3 The demand on the service has been relatively wide-reaching however but can be focussed on three key elements
- 3.4 Temporary Accommodation demand increased with immediate effect during lock down. Those requiring TA were also those with higher support needs than usual. The team worked closely with Landlords, Housing Associations and supported accommodation providers to restart the housing sector and utilise existing stock to realise the necessary throughput required. This has paid dividends with occupancy returning to near normal levels.
- 3.5 The diagram at figure 2 below demonstrates the increase in TA occupancy rates during the lockdown and continued pandemic period.

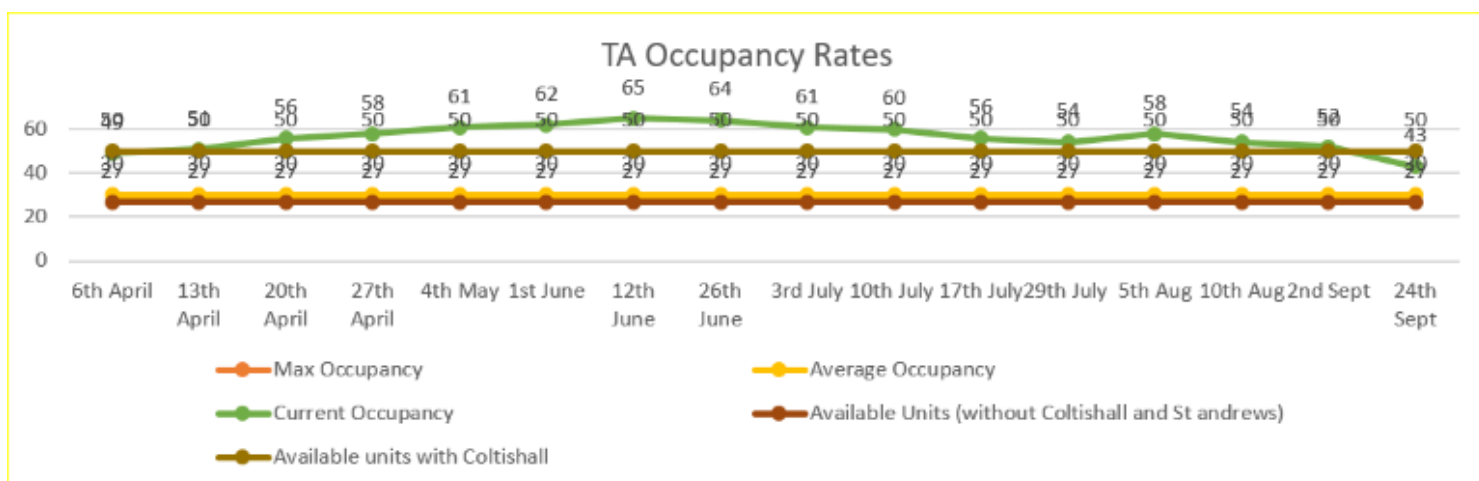


Figure 2: TA Occupancy Rates

- 3.6 Incoming calls have steadily increased and the Council is not seeing any reduction. Although the below only shows incoming calls the overall income and ongoing calls combined is circa 2000 a week showing the proactive nature of the team to work through their cases. We anticipate that this will continue and to support the teams call handlers who can assist with basic call questions have been put into place thus allowing the specialist HSO s to act on their case work and avoid people facing homelessness. The diagram at figure 3 demonstrates the increase in customer contacts during the pandemic period.

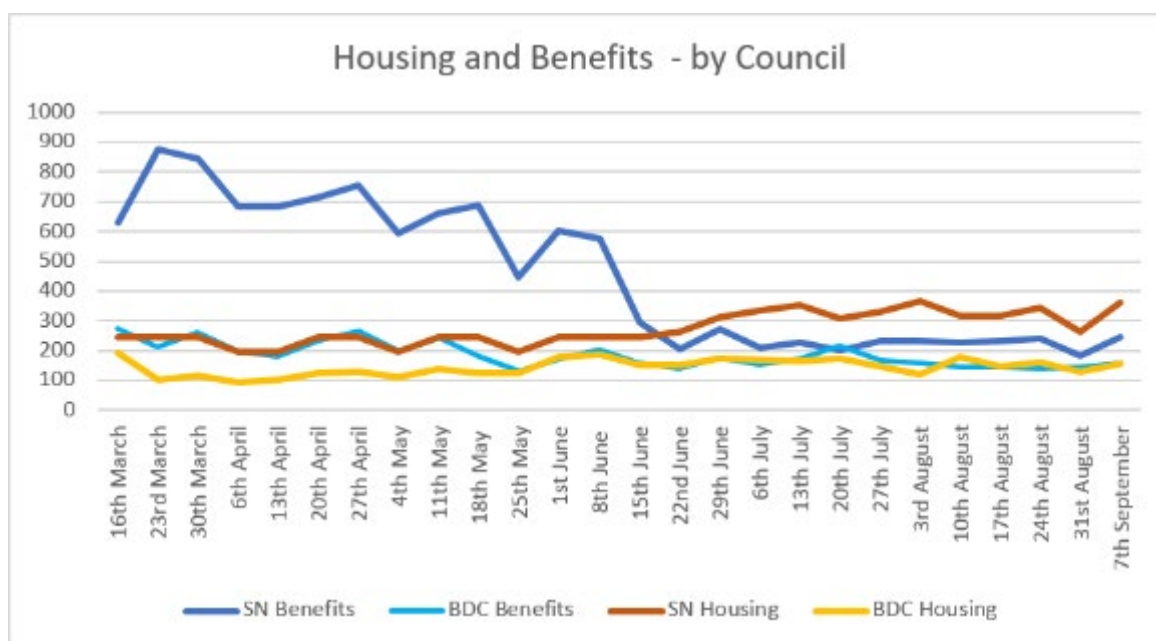


Figure 3: Customer Contacts to the Housing & Benefits Team

- 3.7 At present the team are not having to accept increased homelessness cases than usual however this is only due to the restriction on evictions that was put into place by central government. The fact that numbers remained sustained despite this is very concerning, especially when considering the phone stats evidence the number of those worried re their current housing situation. We anticipate that this number will continue to rise, figure 4 below shows that

there was a marked increase in August, before the ending of the freeze on court eviction hearings. The team have done all they can to negotiate with landlords and find people alternative accommodation during the hold provided by the eviction freeze in order to mitigate this impact. However we do anticipate demand to be sustained on at an increased level, circa 30% for the next few years.

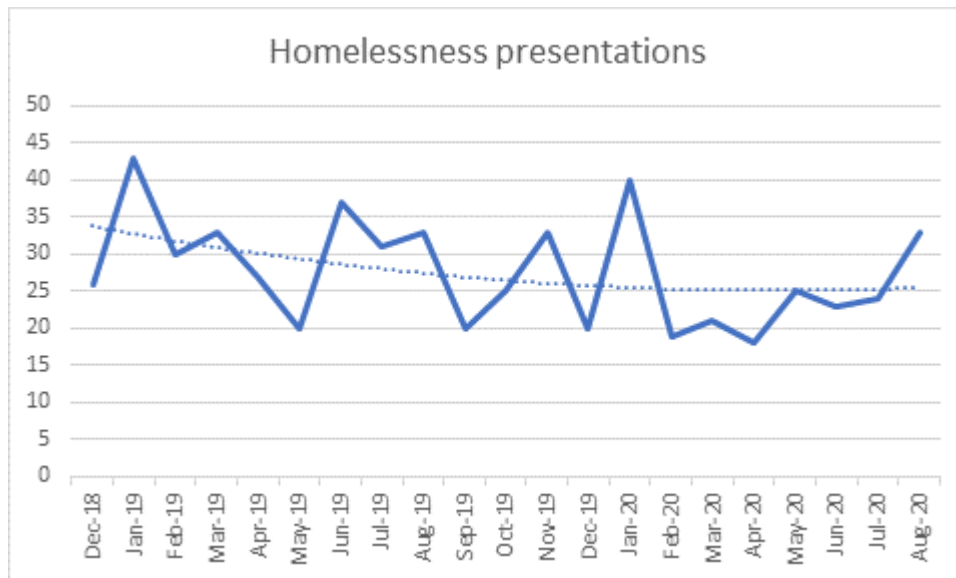


Figure 4: Homelessness Presentations

The Greater Norwich Homelessness Strategy and the South Norfolk and Broadland Rough Sleeper Statement

- 3.8 The documents above were approved for adoption and publication in September and take a person centred, preventative approach to increase resilience and offer wrap around support for those who might need extra assistance when tackling homelessness. This feeds well into the proposed direction for the housing service outlined in section 5 below.
- 3.9 The priorities contained within the documents are:
- Domestic Abuse
 - Preventing Homelessness
 - Single and Youth Homelessness
 - Financial Inclusion, Welfare Reform and Economic Growth
 - Early Intervention and reducing the incidence of rough sleeping

- 3.10 These priorities were reviewed in response to the COVID-19 outbreak with the findings that the identified priorities were still highly relevant and the details of demand above reflect this.

4 ESTABLISHING A SERVICE BASELINE

4.1 In drawing together a baseline from which an innovative and customer focused housing model can be built, Campbell Tickell undertook a number of activities. This was achieved through working closely with the project team and the wider Housing and Benefits team in addition to desk top research and data analysis. These include:

- Approach: A review of the current access and delivery model for managing homelessness and the allocation of social housing
- Insight: A review of demand, demographics and support needs, drawn from statutory returns and data held on the housing management systems of both Councils
- TA provision review: A review of demand, an assessment of the Council's TA portfolios, cost effectiveness and effectiveness of procurement strategies
- Social Housing provision: A review of access arrangements, registration and assessment processes, housing register management, allocations and lettings processes, and tenancy sustainment support provision.
- Service user perspectives: Drawn from a digital survey of recently housed tenants, highlighting the experience of the customer journey
- Partnership perspectives: Drawn from interviews with senior and frontline staff from partner landlords, neighbouring District Councils, people focussed service functions of the County Council, and other service providers.

4.2 A full analysis of the findings can be found at Appendix A, however they have been summarised in tables 1 and 2 below.

Baseline Review Findings		
Theme	Areas of good practice	Areas for consideration
Approach and Demand		Can be a cliff-edge service. Despite the Councils best effort customers only seek support when in crisis. Can be passive, not proactive service Building resilience is not a front loaded activity
	Prevention and relief of homelessness is good (above England average) Numbers of households in TA are low.	Can be viewed as 'a race to the bottom' as customers see the higher bands as the only means to gain a property Low numbers of customers are able to stay in their current home at point of presentation, high numbers of

Baseline Review Findings		
Theme	Areas of good practice	Areas for consideration
		households diverted in alternative accommodation, mainly social housing. Not sustainable long-term and does not promote a mixed economy of solutions.
Data		<p>BDC - Collection of data to build insight is difficult owing to two IT systems covering different aspects of the service, one of which is about to be de-supported.</p> <p>Use of data to take a proactive approach in anticipating and meeting demand</p>
Temporary Accommodation (TA)	<p>BDC – Low use of B&B accommodation</p> <p>Provision of support for those in TA Work is underway to implement a single, fully resourced TA team with clear responsibilities Good mix of TA offer available throughout</p>	<p>BDC – Private Sector Leased scheme is costly following changes to DWP subsidy rules and more suited to longer term placements SNC – Portfolio is too small and could see increased reliance on costly B&B accommodation. This was particularly evidenced during the peak of the COVID-19 pandemic</p> <p>Work needs to be completed Operational documents to be standardised and adopted</p>
Social Housing Provision	<p>SNC – Offer online qualification of applications</p> <p>Safeguarding of vulnerable residents is strong. Good coordination with Help Hubs and support partners and open and compliant service for sensitive and local lets. Transparent approach to shortlisting applicants</p>	<p>Processes to maximise online applications and provision of proof by applicants. BDC – 3 band system for Housing List is not broad or transparent enough SNC – 5 band system for Housing List is too complex. Straightforward and transparent banding system required to standardise banding decisions and remove risk of challenge. Application/Housing List reviews to have a consistent review schedule Introduction of accompanied viewings for vulnerable residents</p> <p>BDC - Manual approach to shortlisting can be time consuming. Landlords need to give 4 weeks' notice of voids to allow for effective matching.</p>

Baseline Review Findings		
Theme	Areas of good practice	Areas for consideration
		Landlords to provide timely lettings paperwork. A self-service digital portal for landlords would make this simpler.
Compliance and Performance	Teams are compliant, however this is not backed up by policy as per section 1 of this report.	A legal offer of housing. This needs to be in writing to complete audit trail Policy needs to be updated

Table 1: Baseline review findings

Baseline Review Findings		
Theme	Areas of good practice	Areas for consideration
Service User Perspectives	<p>Assessment letters were felt to be accurate</p> <p>A high proportion of respondents were aware of the Council's allocations scheme and banding system.</p> <p>Half of respondents were housed within 6 months of being placed on the housing list.</p> <p>85% of services users felt that their views had been taken into account when they had been made an offer of housing.</p>	<p>21% of respondents asked for a review of their application with two-thirds having their banding decision adjusted</p> <p>Special circumstances could be better reflected</p> <p>45% of respondents contacted the housing service once they had been placed on the register. 68% of these contacts were to request information, check their status on the list or query their banding. Indicating a self-service portal would be beneficial.</p>
Partnership Perspectives	<p>Positive day to day working relationship reported</p> <p>Nominations and CBL processes each felt to have strengths and weaknesses</p> <p>Partners in favour of this</p> <p>Partners in favour of this</p>	<p>Nominations and CBL processes each felt to have strengths and weaknesses</p> <p>Ensuring up to date customer data and sufficient team resource is important to avoid void delays</p> <p>Review of formal arrangements and Service Level Agreements (SLAs)</p> <p>Exploring options for continued support for new tenants to ensure sustainment</p>

Table 2: Baseline review findings: Stakeholder engagement

5 DEFINING A BEST IN CLASS HOUSING OFFER

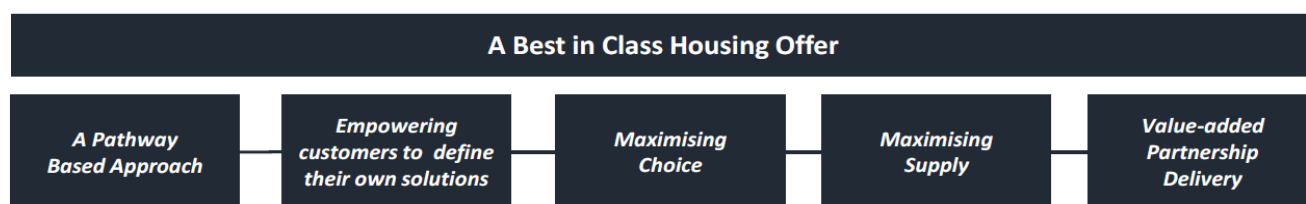


Figure 5: A Best in Class Housing Offer

- 5.1 It is imperative that the Council gives due deliberation to the areas of consideration given above in order to; deliver a compliant housing service; effectively meet challenges of COVID-19 as we stand the precipice of severe economic recession; and to facilitate households to think sooner about their housing situation, to avoid the circle of housing crisis and re-presentation to housing service. To achieve this, Campbell Tickell in working with the Internal Officer Team and the Joint Member Working Group, have co-designed a Best in Class Housing Offer.
- 5.2 The offer applies new thinking to the way housing advice, homelessness and social housing provision is delivered by the Council. The focus is on enabling customers to consider their housing options from an as early stage as possible, to increase customer resilience, avoid housing crisis and to support those where needed. Ensuring that households are in the right accommodation and homes at the right time means that there is less pull on resources, both staffing and financial and that the solutions offered are sustainable. The components of this offer are:
- 5.3 A Pathway based approach: To shape a holistic response to all residents in housing need, particularly as the full impact of COVID-19 becomes apparent and the Councils have to respond to a severe economic recession and its impact on housing and homelessness. The accommodation pathway model will deliver substantially more accommodation options over and above the combined statutory TA needs and will feature; suitable TA accommodation; short-term 6-12 month supported accommodation to help prepare households for longer term solutions and; long term housing through Social Housing or the Private Rent Sector (PRS). This would reduce the incidence of re-presentations from households experiencing a cycle of housing crisis and homelessness.
- 5.4 Empowering customers to define their own solutions: The new essential public service for residents in housing need regardless of whether they meet the statutory means tested categories of housing need. A Marketplace will help residents access a far wider range of accommodation solutions, including remaining in their own homes where possible, facilitated through the actions of the Council. Interventions would consist of light touch enabling or direct intervention.
- 5.5 Maximising choice: It is recommended that accommodation services, such as the PSL scheme and First Step service, are brought together to maximise the

pool of accommodation options available for the Council to meet or end its statutory duties as well as providing an alternative accommodation option that can be used for TA.

- 5.6 Maximising supply: The Accommodation Pool could consist of private rented accommodation, supported housing units where the Council has nomination rights, third sector hostel accommodation, accommodation secured through new initiatives either by the Council or registered providers and developers. Strategies to maximise access the private rented sector can also be developed. This will reduced pressure on the social housing sector and minimise the need for temporary accommodation.
- 5.7 Value-added partnership delivery: The commitment of staff with the One Team structure to deliver an effective housing-led response to COVID-19 is recognised as a potential key to unlocking a holistic service model with a wider shared service vision across the wider public sphere. Landlords are keen to review and formalise working arrangements that better reflect the post COVID-19 operating environment. In addition, commissioners and providers recognise that COVID-19 can act as a catalyst for joining up service elements around an individual at the centre and a housing and early intervention approach as a key driver. A strategic and coordinated response is imperative.

The Interim and Temporary Accommodation Pathway

- 5.8 The Council notes the report recommendations concerning new models of TA provision, the Accommodation Pool model and opportunities to expand on a wider Norfolk footprint. This pool aligns the current TA provision available across Broadland and South Norfolk making use of the different types of accommodation to best match need with the customer and the type of accommodation required at that time. This approach ensures an effective and consistent use of current provision and minimises voids and avoids. Further options for wider commercial opportunities that will allow the Council to reinvest in the housing offer can be explored.
- 5.9 These recommendations will be worked up into more detailed business case/proposals and where required brought forward for member approval. In line with current agreed measures, the Portfolio Holder will be briefed during the process.

The Accommodation Pathway Model

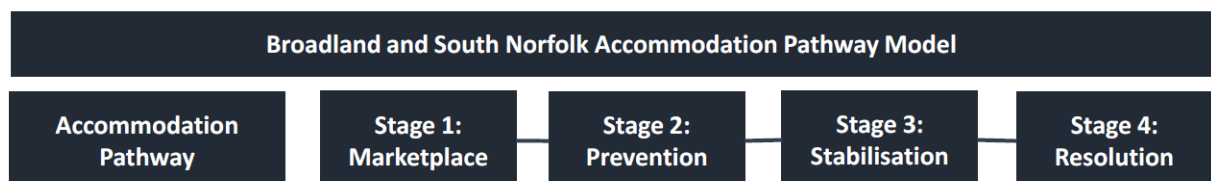


Figure 6: The Accommodation Pathway Model

- 5.10 The proposed Accommodation Pathway Model will provide a universal service open to all those with a housing need, through the provision of a one-stop housing advice platform on a wider basis than that of social housing. This could include options for young people moving away from the family home, affordable home ownership and entering the PRS. The model will offer:
- 5.11 Marketplace: Will provide digital self-help for the majority in housing need, and with early intervention for residents who may require additional support. Residents are encouraged to self-identify their housing need and begin to plan their housing future based on a Personal Accommodation Pathway. Housing need risk factors will be identified and effective help delivered based on the principles of self-help and resilience for those able to help themselves and proactive help for those who are more vulnerable.
- 5.12 Prevention: Proactive service intervention to prevent homelessness at the point of crisis to maximise positive outcomes.
- 5.13 Stabilisation: Provide excellent TA for those owed a statutory duty and additionally provide support and stabilisation for those who require more help to resolve problems that are more than just the need for a roof over their heads.
- 5.14 Resolution: Permanent resolution of the housing needs of households whether they are receiving formal interventions or owed a statutory TA duty, by delivering realistic, and suitable accommodation options across all tenures, and to break the cycle of the revolving door of eviction and homelessness by helping them build resilience and skills to sustain long-term accommodation solutions.
- 5.15 As with the Temporary Accommodation pathway, the findings from the project have made a number of recommendations in relation to the Social housing accommodation pathway which, in conjunction with the bringing together of the One Team Housing & Benefits Team, form part of a longer-term programme of works. These recommendations will also be developed into more detailed proposals.
- 5.16 Underpinning the proposed Accommodation Pathway model is the Allocations Scheme adopted by the Council. As detailed in section one. The current Allocations Scheme is in need of updating, however in adopting the proposed model, which is detailed below, it allows the Council to set out its intention to deliver a truly transformative housing offer.

The Draft Allocations Scheme

- 5.17 The Allocations Scheme which sets out the process for determining priorities, and for defining the procedures to be followed in allocating housing accommodation needs to be implemented as soon as possible and is being brought forward through the member process for consideration and approval. This is necessary to ensure the Council can provide the most effective housing service for our customers through an up to date and legally compliant scheme

- 5.18 The draft scheme has been co-produced between the internal officer team, the JMWG and Campbell Tickell and checked for legal compliance by NPLaw. The section below outlines the aims of the scheme and some of the key areas of variation with the previous scheme. The full draft Allocations Scheme document can be found at Appendix B.

Aims of the Allocations Scheme

- 5.19 Through the aims of the Allocations Scheme the Council seeks to:
- Improve the means by which local people gain access to social rented housing through a system that allows choice and is fair, transparent and accountable.
 - Ensures the lettings service embraces equality and diversity by being open and fully accessible to all individuals and to provide support to customers where needed
 - Meets the legal obligation of the Council in respect of giving appropriate priority to customers with a 'reasonable preference' category
 - Makes the best use of housing stock, including areas of low demand and 'hard to let' properties.
 - Assists customers with understanding their housing options
 - Increases opportunities for tenant mobility
 - Formalises partner working arrangements

Qualification for the Housing List

- 5.20 Criteria for the Housing List will ensure that local and, in some cases, people from outside the area in genuine difficulty are supported. The full criteria can be found at Section 3.2 of the draft Allocations Scheme.
- 5.21 The Council has some discretion in how it applies some qualification criteria where it is not prescribed under current legislation. For example, in applying a specific length of residency criteria. The Qualification criteria in the draft Allocations Scheme is broadly similar to the current criteria. An additional clause has been included to recognise a local connection for civil ex-partners of armed forces personnel. This is to align with the Council's Armed Forces Community Covenant pledge demonstrating support for our Armed Forces Personnel and their families.

The Allocation of Social Housing

- 5.22 The process by which it is proposed that the Council allocates a social housing property has been given careful consideration as part of the review and redesign process. In this, Campbell Tickell have been invaluable in understanding current practice, and identifying where changes can be made. The Council currently operates a predominantly Choice Based Lettings (CBL) system whereby customers bid on available properties through the Council's Home Options Service. Customer are limited to properties that are relevant for their needs, for example, bedroom size.
- 5.23 The current process has benefits in that it offers choice to the household and assisted bidding and direct lets are available for those who need additional support or where, for example, a sensitive let is requested by the landlord. However, feedback into the review has found that CBL can be problematic where there are occasion of housing development completions and properties becoming available in one area. Households may bid on the most favourable property in that development meaning there could be multiple bids on one property and less on the others leading to households on the higher bands not being successful for the new properties.
- 5.24 Taking these considerations into account, a Hybrid Allocations Process is proposed, for the majority of applicants this would be through a predominantly Choice Based Lettings (CBL) system. This includes the assisted bidding process for those who need additional support.
- 5.25 Additionally, the Council needs to ensure that, where existing social housing properties with adaptations become void, they are managed so that the adaptations don't have to be removed. This is not a good use of housing stock to meet the needs of applicants on the housing list, nor is it a good use of the Council's Disabled Facilities Grant (DFG) Funding which may have been used to install the adaptation. In these circumstances, working with the Landlord and adopting targeted advertising or Direct Lets may be implemented to ensure a better use of stock and an appropriate and long-term housing solution for the applicant.
- 5.26 Direct Lets and Nominations will be available in other circumstances, which are outlined in full in the draft Allocations Scheme at Appendix B. However, in summary they will be apply where:
- There is an urgent rehousing requirement
 - Where there has been failure to bid or a number of refusals
 - Where the applicant is vulnerable
- 5.27 In addition, where there is a delivery completion of more than five houses on a particular development, a nominations process will take place to review all applicants circumstances within the banding criteria (including s106

requirements) and allocate the most suitable properties to each successful individual to make sure those in most need gain access

Housing Priority Bands

- 5.28 Applications to the Housing List are assessed to determine the level of housing need of the household and are placed into a banding system. During the review process, it was felt that the South Norfolk five banded system was too complex. In this instance a four banded system is proposed. The system is broadly similar to the current system adopted by the Council, however it would serve to bring together the existing Bronze and Low band categories in to Band 4 and simplify the banding system overall.

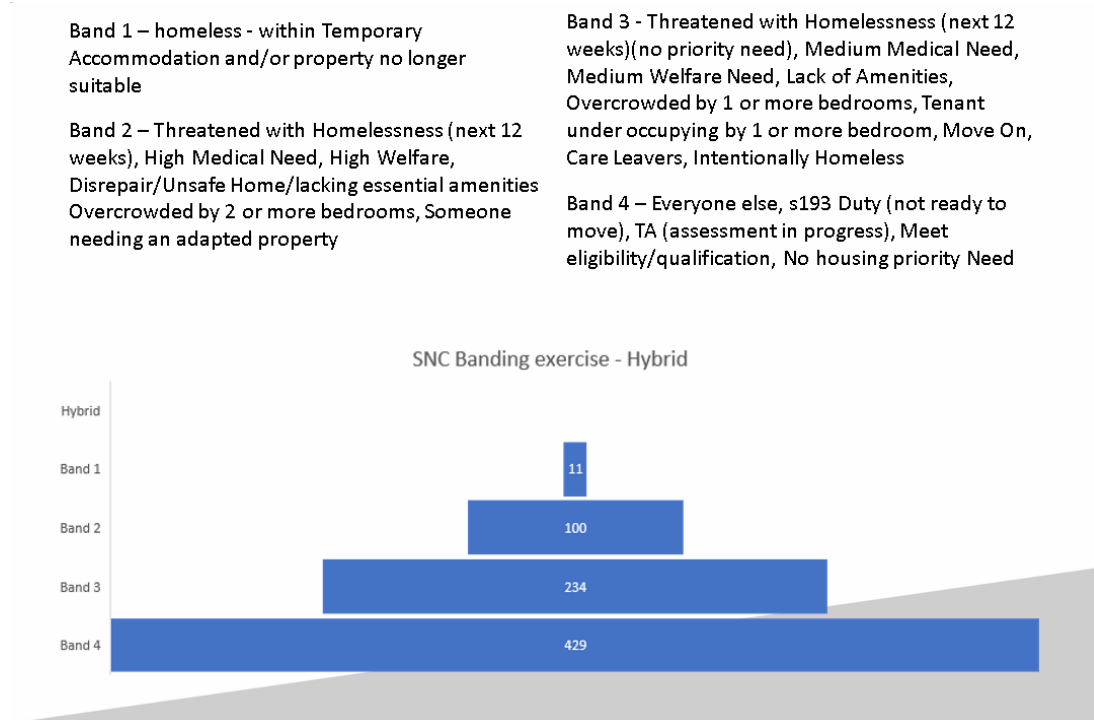


Figure 7: South Norfolk Housing Priority Bands

- 5.29 Where applicants would normally be allocated a reduced preference banding, generally a low priority banding because they would not normally meet the qualification criteria due to, for example, rent arrears or anti-social behaviour, it is proposed instead to operate a suspension of bidding arrangement. In this respect, applicants would be awarded banding based on their needs but they would be suspended from bidding on any properties until a suitable period of stabilisation has been completed. This could include seeking support for anti-social behaviour or paying down rent arrears. In this way good tenant behaviour is promoted and there is increased likelihood of future sustainable tenancies. It should be noted that all suspension of bidding cases will be assessed carefully on their circumstances, for example where rent arrears arose due to the applicant being a victim of domestic abuse, we would not seek to apply a suspension of bidding but would ensure the applicant was able

to fully access appropriate support through the housing team, help hub and wider partners.

Single point of access to Housing service and subsequent allocation of properties

- 5.30** In line with the One Team Housing & Benefits team approach, where a customer approaches the Council for help with their housing issue this will be through a single point of access with a single system to manage each applicant's case, enabling the application of consistency and efficiency for the team. At the point in which applicants can place their bid for properties, they will be able to see and bid on all relevant properties available across the Broadland and South Norfolk Districts.
- 5.31** Following feedback from officers and the JMWG, the diagram at figure 8 below demonstrates how the available properties will be allocated to applicants. Where the property is in the South Norfolk district, the properties will be allocated to applicants from that area in order of priority banding. If no suitable applicant is found from South Norfolk the allocations are then opened to applicants from Broadland, again prioritised by banding.
- 5.32** This approach allows for an effective use of the housing stock, minimises void times and encourages use of hard to let properties. It also provides opportunities for mobility for residents of the two districts but only where properties cannot be allocated to households with an existing connection. It should also be noted that where properties are subject to an s.106 cascade, that will always supersede the arrangements below.

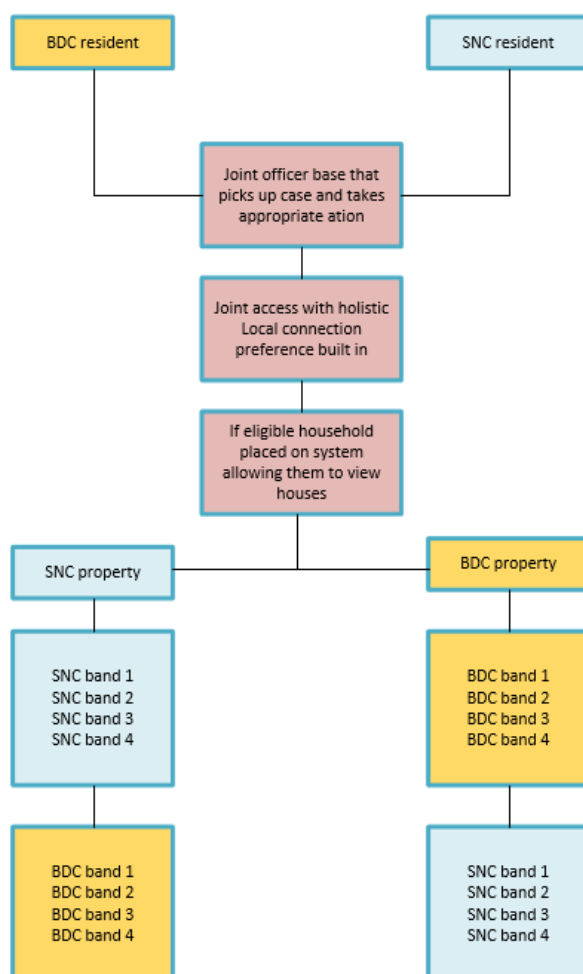


Figure 8: Allocation of properties by Priority Band and Council

6 NEXT STEPS

- 6.1 The findings from the project have made several recommendations which, in conjunction with the bringing together of the One Team Housing & Benefits Team, form part of a much longer-term programme of works. The Allocations Scheme which we are bringing forward for member approval now is a vital aspect of this.
- 6.2 A project implantation team is being put together linking with the Internal Consultancy team, the Housing & Benefits team and the Policy & Partnerships team to see take this work forward. Detailed implementation plans including delivery timescales, resource requirements and interdependencies with wider SPARK projects such as the shared website are to be developed fully. In addition, project progression will be updated via the regular Portfolio Holder briefings.
- 6.3 However, to an overview of the current resource requirements has been provided below:

- Project oversight – this will be needed for the 6 months running up to April 2021. This work will be done by the internal consultancy team. There may be a further financial pull if the internal consultant is unable to facilitate this role, this will be capped at £20k
- System upgrade – over a four year period the upgrade will provide a saving for both Councils. As annual maintenance/licence charges differ for each Council (SNC 22500.00p/a, BDC £35167.00p/a) the level of savings are different for each Council. The total contract change are being shared within the standard 45/55 split. Further information can be found at Appendix C.
- Data configuration – to facilitate implementation of the new Allocations Scheme there will be a need to manually check, update and input particular residents. There will be the possibility to automatically port a large majority however this will create an additional pull on the team resource. This is however a great opportunity to gain experience in Housing and the Council as a whole. The team are therefore utilising the Kickstart programme. This will create a small cost to the Council, however, by utilising the Kickstart programme this will be heavily mitigated whilst also providing a great opportunity to someone who might otherwise not be given the chance to widen their skillset and employability.
- Engaging with stakeholders and the private sector to facilitate the TA pathway – the Council has sufficient skillset within the team to improve the way we work with the private sector. The aforementioned project oversight will take the role of co-ordinating this work to make sure it is delivered on time.

- 6.4 As other aspects of delivering the housing service come forwards, resources will be considered as part of business cases, and subject to appropriate decision making forums.
- 6.5 A period of consultation is required to seek the views of the public and stakeholders for the draft Allocations Scheme. This consultation will run for two weeks from Friday 9th October to Friday 23rd October. As of 20th October, 146 complete survey responses have been received.
- 6.6 A requirement of the LGA funding is that the Councils prepares a project case study that will be available on the LGA website and form part of the learning package for future Housing Advisor Programme funded authorities. It is proposed that the case study focus on the successful collaborative working of the JMWG and the desire to develop an innovative approach to Housing and Homelessness services in a COVID-19 landscape. This case study will be completed by December 2020.

7 OTHER OPTIONS

- 7.1 Cabinet may wish to suggest alternative options for consideration in terms of the draft Allocations Scheme. However, it would not be feasible to continue with the current scheme as it is in urgent need of updating to ensure legal compliance and prevent the risk of challenge.

8 ISSUES AND RISKS

- 8.1 **Resource Implications** – There is resource requirement to implement the new offer and an overview is given at 6.3 above.
- 8.2 The Allocations Scheme was developed in partnership between officers and members of South Norfolk and Broadland Councils and Campbell Tickell. Although individual documents have been created for each Council, the content is the same. This will enable an equal approach for residents and ensure a consistent and transparent service delivered by the one officer team. If the Council chooses to pursue different versions of the scheme, there is a risk that transparency could be lost, in addition to decreasing resilience within the housing team. Furthermore, separate methods of administering the scheme would result in increased costs in delivery of the IT systems.
- 8.3 In terms of the Best in Class Housing Offer, as has been indicated above, demand for the housing service has increased during the COVID-19 outbreak. Although the housing team has continued to deliver a high performing service, the findings of the review indicate that the model has to be changed in order to continue to meet that demand. In this respect a do nothing option would not provide an efficient or sustainable offer.
- 8.4 **Legal Implications** – A Housing Allocations Scheme is a requirement of the Housing Act 1996. Failure to have an up to date and relevant Allocations Scheme means the Council may be at risk of not meeting its statutory duty. It could also lead to an increased risk of challenge from applicants on the housing list.
- 8.5 **Equality Implications** – As individual elements of the Housing offer are brought forward they will be assessed for a potential equalities impact, although the overall aim is for the service to have a positive impact on those with a protected characteristic. As the draft Allocations Scheme is being presented for adoption, an Equalities and Communities Impact Assessment has been completed and can be found at Appendix D.
- 8.6 **Environmental Impact** – There are no known impacts
- 8.7 **Crime and Disorder** – In working to offer sustainable housing solutions, and prevent housing crisis and homelessness including for those who have had contact with either side of the criminal justice system, it is hoped to assist victims and prevent instances of offending and reoffending.
- 8.8 **Affordable Housing Delivery** – Although out of scope of the project work, it is important to note that the delivery and provision of affordable housing is a key

aspect in resolving a person's housing need, whether this is through Affordable Rent Tenure (ART) properties or Affordable Home Ownership Products. The next iteration of the Housing Needs Assessment, formerly the Strategic Housing Market Assessment (SHMA) is under development and expected to report in the spring 2021. This assessment provides the evidence base for affordable housing up until 2041 and will feed into the policy work for the Greater Norwich Local Plan (GNLP).

- 8.9 The outcomes of the current central government consultation on the planning White Paper *Planning for the Future* will also need to be given careful consideration as the project plans for implementation of the housing offer are brought forward. Contained within the white paper are proposals to; abolish the Community Infrastructure Levy (CIL) and S106 obligations, to become instead a simplified nationally set, value-based flat rate charge; to amend the development threshold for affordable housing from 10 units to 40 or 50; and for First Homes, homes sold with a discount of at least 30%, to make up at 25% of that affordable housing provision.
- 8.10 **Interdependencies** – There are a number of interdependencies both internal, through the corporate change projects that are underway, such as the Councils' economic recovery work and an example has been given above of using the Kickstart programme to provide support to the implementation process of the Allocation Scheme. There are also external interdependencies such as the local and national considerations to be given to affordable housing provision such as that detailed at 8.8 and 8.9 above. Close working with the owners of these projects and careful consideration of impacts will need to be given as the Allocations Scheme and overall Housing offer work is developed.

9 CONCLUSION

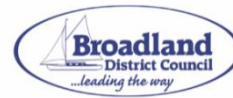
- 9.1 The Council's work with Campbell Tickell, through the LGA's Housing Advisor Programme funding has given us the opportunity to develop a world class housing service that will change the culture and approach for supporting residents in housing need to find solutions. It will also enable the Council to take a proactive approach to housing need during this time of Covid uncertainty and for the long-term ramifications of the pandemic
- 9.2 The innovative vision presented in this report is not something that can be achieved in a short space of time and instead we are asking for members to note the findings of the Best in Class Housing Offer project. However, there is a pressing need for a new Allocations Scheme to be approved and embedded. This will not only enable the Council to meet its statutory duty but will form the cornerstone of the Housing Service as it seeks to deliver a truly innovative and preventative service for residents.

10 RECOMMENDATIONS

- 10.1 Cabinet to note and comment on the findings of the final project report and recommend full Council endorse that Officers work towards the Best in Class Housing offer.

10.2 Cabinet to recommend to Council adoption of the Allocations Scheme.

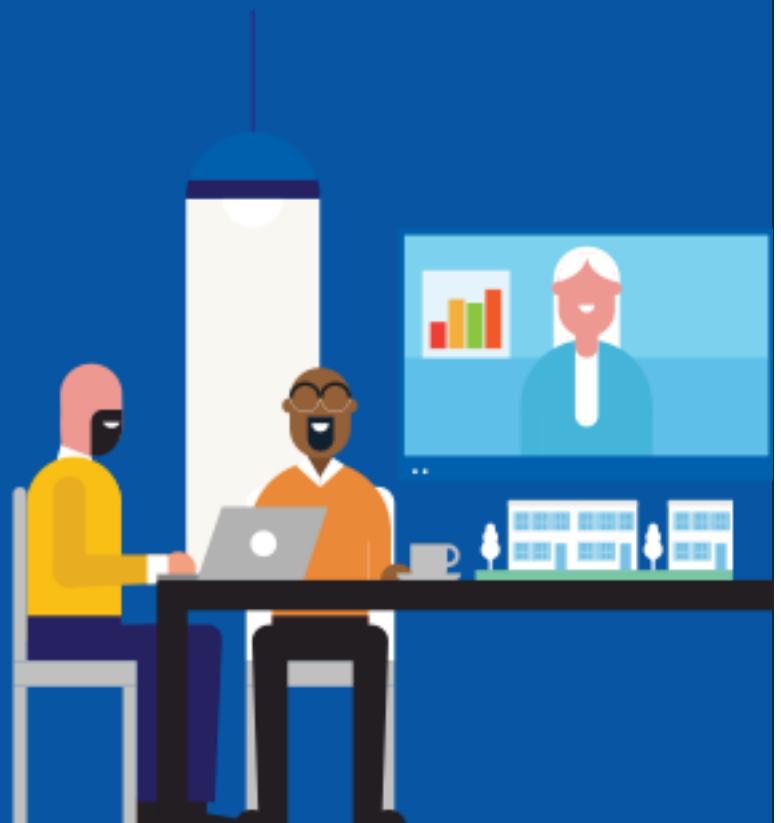
CAMPBELL
TICKELL



Best in Class Housing Offer

Final Report

August 2020



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1. EXECUTIVE SUMMARY

Ambition

- 1.1 This report sets out the vision for creating an ambitious *Best in Class* housing service for Broadland and South Norfolk, enabling anyone in housing need to resolve their own accommodation needs, whilst focusing scarce resource on households in housing crisis to avoid homelessness and secure sustainable accommodation options, delivered within a sustainable service delivery model and an extensive partnership framework.
- 1.2 An *Accommodation Pathway Model* will be a first of its kind in the UK to deliver a holistic housing service to the whole community regardless of their immediate need.

Approach

- 1.3 The aim of the project is to enable Broadland and South Norfolk to create a flexible service offer that meets the individual needs of each sovereign council, but delivered through a single policy framework, operating model and social housing system.
- 1.4 The project has been delivered in partnership with Campbell Tickell (CT) and has been funded through the Local Government Association (LGA) Housing Advisor Programme (HAP), which has the aim of supporting transformation partnerships that enable services to meet their local housing need. This collaboration will allow Broadland and South Norfolk to project both the ground-breaking approach and the eventual service outcomes onto the national stage
- 1.5 A Members Working Group drawn from both Councils has been instrumental in acting as a sounding board throughout the project and sense-checking solutions, before they enter the governance cycles of each council.

Pulling back from the cliff-edge

- 1.6 Housing delivery models delivered by councils across the country are without exception passive in nature, delivered at the point of crisis to a relatively small cohort of households. They fail to deliver practical housing advice and solutions for the vast majority of residents that have a housing need, who are filtered-away from receiving support of any kind. This approach also fails to deliver resilience amongst residents in housing need by expecting them to be proactive, adapting their behaviour to increase their chances of obtaining a solution.
- 1.7 As a consequence, many residents end-up in housing crisis, resulting in homelessness and an application under statutory homelessness legislation. This situation is compounded by a lack of strategic alignment between Councils and landlords, resulting in a transfer of risk and responsibility for those placed in social housing, which increases the risk of tenancy failure, often resulting in a life-limiting and costly unbroken cycle of homelessness and eviction.

Forming a Service Baseline

- 1.8 Despite a significant increase (162%) in homelessness across in Broadland and South both councils since the enactment of the Homelessness Reduction Act (HRA), both Councils have been particularly successful in preventing homelessness through upstream interventions,

which has relieved the pressure on Temporary Accommodation (TA) provision. However, this has been achieved almost exclusively by placing households in social housing, whilst there are no examples of an individual or household avoiding homelessness by remaining in their current accommodation, whereby avoiding an intensive service intervention altogether. This is not a fair or sustainable strategy.

1.9 A significant percentage of individuals approaching the service do so from what had been a stable home or sustainable tenancy, or from a position of relative financial stability, highlighting the need for supporting individuals to plan their own accommodation pathway before a point of crisis is reached. It is also clear that future demand and the need for structured interventions will be increasingly driven by younger people with less well developed life-skills, single person households who have very limited options, people leaving care settings with complex needs (particularly mental health conditions), and older-people requiring accessible housing solutions.

1.10 The demand for TA has remained fairly constant. However, the introduction of two new prevention and relief duties means that a balance between the need for short term emergency accommodation needs to be struck. Based on the analysis undertaken, Broadland and South Norfolk require additional short-term emergency accommodation and less long-term temporary accommodation moving forward. There is also an urgent need to implement a new TA structure from one location to ensure consistency, control and continuity.

1.11 CT has sought the view of recent service users and stakeholder landlords, to understand the effectiveness of the current service and future priorities:

Service users: Whilst generally happy with service they received from their Council, however the number of re-banding decisions upheld on appeal and level of contact made to chase progress, demonstrates that there is considerable scope to digitise (change of circumstances) , automate and streamline (bidding and lettings) many aspects of the service.

Partner landlords: View the combined service in a positive light and would like to see the adoption of a joint, a blended approach to allocations moving forward that combines both approaches would be welcomed. They would also welcome the establishment of more formal, partnership-based relationships moving forward, centred on sharing risk and the needs of the individual.

1.12 The creation of the new One Team operating model provides a unique opportunity to completely overhaul the current model of social housing provision, building on upon the strengths of the combining services in identifying needs and providing supporting services through their respective Support Hubs.

Facing the future

1.13 In the Covid-19 operating environment, a sit back and wait approach is not an option. A demand spike driven by unemployment, tenancy and mortgage default, mental health and domestic violence driven household failures, could result in such financial pressure that the viability of the Councils is at risk.

- 1.14 New thinking is required to meet the legal responsibility to deliver housing advice, to help all residents in housing need to avoid homelessness. Existing service offers based on intervention at the point of crisis and delivery models based on disjointed service elements have been made irrelevant almost overnight. Only a holistic Pathway model can deliver an effective response on a sustainable basis.
- 1.15 Broadland and South Norfolk are at a natural point of reinvention and have the opportunity to be bold and create a *Best in Class* solution based in the Covid-19 world, which provides universal on-line access to support all residents and empower them to resolve their own housing issues. To support households along a supported pathway that keeps them away from or move successfully away from homelessness, with wider accommodation choices based on their circumstance, and to work in partnership with landlords and support providers to help individuals build a level of resilience that reduce future reliance on the system.

The Accommodation Pathway Model

- 1.16 The *Accommodation Pathway Model* will enable individuals to plan for their long-term accommodation needs with a realist set of options, whilst supporting those who reach a point of crisis to re-establish and sustain a suitable home.
- 1.17 The *Accommodation Pathway Model* has four clearly defined and outcomes focused stages:



- 1.18 **Marketplace:** Will present a single digital access pathway into the housing service for anyone needing help to assess their housing needs and options, with the objective of delivering self-help solutions to the majority of those in housing need. Equally however, it will identify at an early stage, individuals approaching a point of housing crisis, risk factors that may trigger a formal intervention, and residents who may be too vulnerable to support themselves through the process unsupported.
- 1.19 Marketplace will provide access all available housing products in one place with the intention that it would become the first place to go for all residents in housing need. Residents would be able to register electronically their housing need and explore accommodation options. A personalised *Accommodation Options Plan*, would outline accommodation options over time, applicable to their personal and financial circumstance
- 1.20 **Prevention:** Will provide options for people at imminent risk of becoming homeless. However, if the Marketplace fulfils its role, households seeking support, should be fewer in number and hopefully already in the system and their circumstances known.
- 1.21 Enabling families to remain at home and wait for social housing rather than become homeless is the best outcome for both a household and each Councils. As part of a new allocations policy framework, homeless households could be incentivised to wait for a social housing outcome

and have more choice over where that offer is, rather than becoming homeless and being offered a short-term private rented solution.

- 1.22 **Stabilisation:** Will provide a tailored package of suitable, high quality temporary accommodation and personalised support to a household with the space to stabilise their situation before taking the next step towards self-reliance. Additional wraparound support may be provided to those who need support beyond finding suitable accommodation.
- 1.23 **Resolution:** Will enable households to resolve their housing need through access to permanent accommodation solutions, regardless of whether they are owed a statutory temporary accommodation duty, by delivering realistic, and suitable accommodation options.

Enabling the Accommodation Pathway Model

- 1.24 To enable the *Accommodation Pathway Model*, the disparate components of the homelessness, TA, and allocations services, their service offers, operating models, business systems and partnership relationships need to be re-thought and re-aligned to create a holistic Best in Class solution envisaged.



Best in Class TA Provision

- 1.25 A new model for the provision of TA is a necessity if the right type of TA is to be provided to meet demand at a sustainable cost. The target model for the provision of TA is a closed cycle that will ensure statutory requirements are met, whilst optimising quality of product and operational performance through accurate demand forecasting and utilisation modelling.
- 1.26 Broadland and South Norfolk should adopt a joint approach to TA procurement, based on an accurate mapping of need. Reliance on expensive private rental sector accommodation should be reduced in favour of developing accommodation solutions through landlord partnerships. There also needs to be a shift in the type of accommodation procured from longer-term move-on to shorter-term emergency accommodation.
- 1.27 A dedicated TA management function is required, that is properly resourced and located in one place. An Operations Manual has been developed as part of this project and needs to be embedded, with staff trained in the preventative case-working methods provided.

Best in Class Housing Services

- 1.28 Similarly, housing service provision needs reframing around a joint Allocations Policy, that will blend the approaches currently adopted by both Councils into a compliant, flexible tool for allocating homes fairly and transparently. A combined Choice Based Lettings and direct offer-based approach will best meet the objectives of both Councils and landlords, in recognising local connection, prioritising the homeless and those most in need, whilst still filling hard to let stock and attracting new customer into areas of low demand.

- 1.29 The customer journey for social housing provision must be standardised, automated and performance managed. There is scope to significantly reduce contact demand through smart self-service registration and application self-management and to embed decision making within the business system to drive consistency and ensure transparency.

Best in Class Partnership Solutions

- 1.30 Formalising the management arrangements between the Councils and partner landlords will elevate what are currently little more than transactional relationships into strategic partnership relationships. Landlords would welcome the formalisation of obsolete service level agreements, to share system and data to join-up end to end processes. They would also welcome a strategic approach to helping households establish and sustain their tenancies, by jointly sharing and managing risk of failure, through the provision of wraparound support.
- 1.31 The Covid-19 crisis is focusing the minds of all stakeholders across the County. Neighbouring Districts, core service commissioners within the County Council and service providers all recognise the need for opening-up strategic service partnerships that create whole system approach, delivering wider and lasting outcomes at reduced costs and ongoing levels of dependency. This impetus must be harnessed and channelled quickly into ready-to-go solutions such as *the Accommodation Pathway Model*.

Best in Class Performance Management

- 1.32 A comprehensive Performance Framework will ensure compliance of the whole system, drive-up performance and demonstrate the value of the *Accommodation Pathways Model* in delivering key objectives. Specific objectives should be to measure the quality customer experience and outcomes achieved, the impact of self-service and process efficiency in managing demand, and the realisation of wider service outcomes delivered in partnership.

Delivering the Accommodation Pathway Model

- 1.33 The next step in making the *Accommodation Pathway Model* a reality is to develop a Blueprint that will set-out the characteristics and components of the Pathway and target operating model for the *One Team* housing service. Underpinning the Blueprint must be a robust Business Case that sets out the investment needed to deliver the Pathway, the operational efficiency savings and tangible customer benefits it will deliver. A Transformation Roadmap will enable the service to deliver the change programme quickly and efficiently, with effective governance and resource planning, and to ensure strategic goals are realised through ongoing benefits tracking.
- 1.34 Broadland and South Norfolk are well placed to become the exemplar *Best in Class* solution provider within the sector. This may in turn open up a range of business development opportunities that could generate income and cover investment costs made in the Model.
- 1.35 Finally, the drive of the Broadland and South Norfolk team to complete this project at a time of intense operational change and unprecedented service demand, coupled with the shared vision of Members of both Councils, proves that the *Accommodation Pathway Model* can quickly be made a highly successful reality.

2. INTRODUCTION

Strategic Context

- 2.1 On 2nd January 2020 Broadland and South Norfolk Councils came together operationally as *One Team*, to reshape the future of the two districts, through an innovative transformation of local authority collaborative working.
- 2.2 *Our Plan (2020-24)* sets out a radical agenda for supporting individuals and empowering communities, reshaping services around the needs of the most vulnerable, whilst enabling individuals to become more resilient and less reliant on core service interventions.
- 2.3 Core to this ambition is to undertake a radical reimagining of how to deliver a *Best in Class Housing Offer* that will meet the needs of communities across both districts. A new service offer and operating model is required that will provide a dynamic service for customers with broader choice, coupled with a framework of support services. Operating as a single service and underpinned by digital access pathways and service delivery processes, a new model will enable the service to operate more efficiently.
- 2.4 Campbell Tickell (CT) has been engaged to work collaboratively with the Housing Team to review, research and define a *Best in Class Housing Offer* for housing services.
- 2.5 However, the Covid-19 epidemic has thrown the fragility of long-term planning and aspirational thinking into sharp relief, as robust emergency plans must now deal with the immediate crisis and plot a course back to relative normality. Whilst every service will be in reset mode for the next six months or so, and it is too early to predict the enduring impact over the next three to five years, it is clear that all services will need to fundamentally rethink the way they engage with customers, flexing service offers to meet spikes in demand and changes in needs, to both offer service differently and operate differently.
- 2.6 Necessity is the mother of invention and by driving forward with this project during the lockdown period, it has served to focus and create a sense of real urgency in defining a housing solution that will respond to both immediate needs and meet longer-term aspirations of Broadland and South Norfolk.

Project Scope

- 2.7 The project scope is to:
 - Reduce the need for temporary accommodation in the first instance and exploring options for offering reasonable long-term accommodation options to households;
 - Align current offers to optimise efficiency and minimise risk, offering further options to customers at times of need, whilst respecting the sovereignty of each Council;
 - Investigate funding options to achieve best value for money whilst developing a sustainable model that enables reinvestment of income into support provision;
 - Explore how partnership solutions beyond the boundaries of the two councils to deliver a ground-breaking and exceptional housing pathway.

Expected Outcomes

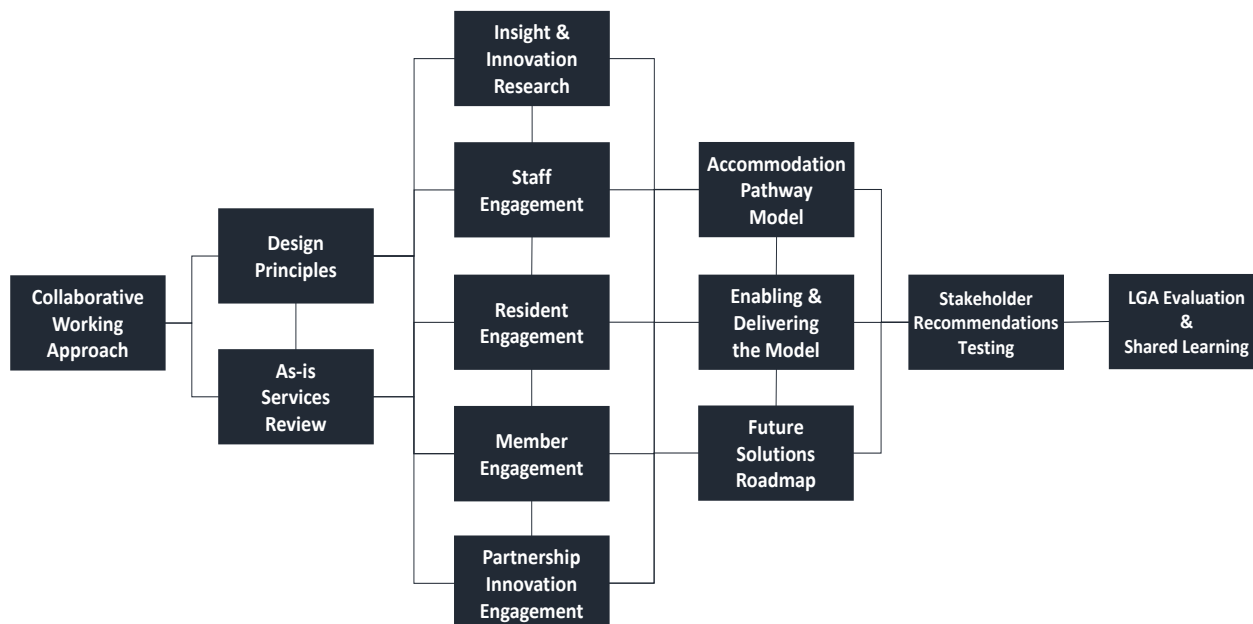
- 2.8 The project is designed to enable Broadland and South Norfolk to create a flexible service offer that meets the individual needs of both, delivered through a single social housing system that can provide a realistic set of largely self-managed housing options for anyone in need of support, whilst supporting those most in need to avoid crisis and to sustain a long-term home.
- 2.9 Specifically, the project will define a model that will support:
- A customer-centred housing offer that will enable people to take responsibility for meeting their own housing needs;
 - A prevention led, boundary-less approach to achieve sustainable outcomes;
 - A convergent policy frameworks;
 - A sustainable operating model;
 - A digital service pathway with support for the vulnerable;
 - Digital processes that support flexible service delivery; and
 - Seamless housing provider and support agency partnerships.

Transformational Partnerships

- 2.10 The project is funded through the Local Government Association (LGA) Housing Advisor Programme (HAP), which has the aim of supporting transformation partnerships that enable services to meet their local housing need.
- 2.11 To this end, Broadland and South Norfolk Council's recognise that there is a significant and timely opportunity to explore what local government can achieve by working together to achieve wholesale redesign of Temporary Accommodation (TA) pathways on a larger footprint. Two other local authorities have given agreement to explore this work further with the councils as part of the review process.
- 2.12 Additionally, at a County level, reviews are underway to explore demand and resource of housing and homelessness services. Based on the outcomes of this review, there is potential to create a cross-boundary, customer focussed and fair approach to seeking housing assistance including a combined temporary accommodation pathway using collective resources.

3. METHODOLOGY

- 3.1 This project has been delivered to a predefined CT methodology, tempered by the limitations of working within Covid-19 lockdown.



Collaborative Working Approach

- 3.2 A collaborate working approach has been adopted from the outset, with the CT team working closely with the newly formed internal consultancy team, with frontline managers and delivery teams, and with a Members Working Group drawn from both Councils.

Design principles

- 3.3 To ensure everyone involved with the project has a shared vision for what constitutes a *Best in Class* approach and to stay focused on that outcome when defining the detail of the new *Offer*, a set of *Design Principles* has been agreed to crystallise key outcomes and deliverables:

- Deliver a Best in Class housing solution, exceeding our statutory duties;
- Provide tailored accommodation solutions based on insight and evidence needs;
- Offer choice to our customers to meet individual needs;
- Promote self-reliance, enabling people to move-on and add value to their lives;
- Be sustainable and free resources to fund housing objectives;
- Be compliant, with robust business processes and systems; and
- Be an extendable or replicable offer to other Local Authorities.

Analysis of current service offer and delivery model

- 3.4 A review of the as-is service offer, operating and delivery models has been undertaken to provide both insight and to serve as a benchmark from which to define and measure the value-add of a target model. This has been achieved through:
- A desktop review of the current policy frameworks, operating procedures, and organisational design;
 - A review of the end-to-end customer journeys of service users approaching the service of both councils;
 - A review of operational processes and systems; and
 - A data and business intelligence review (waiting Lists, performance reports etc.).

Stakeholder engagement

- 3.5 Working with a spectrum of stakeholders has been central to establishing the nature of the need and demand for housing services, in how best to address those needs within a single model, and in shaping a new partnership-based service offer and partnership-based operating model.
- 3.6 **Staff engagement:** One-to-one interviews have been conducted with frontline managers and workshops held with frontline staff, to understand local context and service demand drivers, the strengths and weaknesses of the current operating models, and to establish the key business requirements of the target model.
- 3.7 **Members Working Group:** A series of remote workshops with Members from both districts has enabled the project to test thinking from the outset and to drive the definition of the new model forward based on negotiated consensus. This group has:
- Reviewed and agreed the overarching design principles;
 - Highlighted strengths and weaknesses of current service access pathways;
 - Helped to scope and agree key elements of the target pathway definition; and,
 - Reviewed key aspects of the proposed service model as a precursor to the formal governance review of each Council.

- 3.8 **Service User Engagement:** A digital survey of recent housing service users of both Councils has provided valuable insight into their experience of the service and the outcomes secured.

Partnership Innovation Engagement

- 3.9 A series of interviews with external stakeholders (somewhat curtailed by the Covid-19) has provided insight into the current operating models at Broadland and South Norfolk, how other Districts deliver similar services across the County, and the priorities of key service commissioners within the County Council. This exercise has been invaluable in assessing the appetite for forging new partnership arrangements in response to Covid-19 and to plan and act more strategically:

- 3.10 **Registered Providers:** To review current arrangements for delivering TA and social housing; potential approaches to increasing the pool of accommodation, for developing seamless partnership arrangement and streamlining processes.
- 3.11 **Private rental providers:** To explore current issues and constraints in the system and barriers to extending and developing provision and recommendations for development, particularly of private sector leased properties and self-contained properties for short-term TA.
- 3.12 **Adult and Children's Social Care commissioners:** To explore the responsiveness and effectiveness of the current systems in meeting the needs of vulnerable service users.
- 3.13 **Voluntary and community sector providers:** To explore current support for those in TA and social rental accommodation to develop recommendations for improving support to vulnerable groups in mitigating refusals and failed tenancies.
- 3.14 A full list of stakeholders interviewed is presented in Appendix 1.

Project Outputs

- 3.15 The core output of the project is an *Accommodation Pathway Model*, a highly innovative solution to help individuals meet their own housing needs, whilst supporting the more vulnerable to avoid homelessness, and if not, to stabilise and secure and sustain a lasting home.
- 3.16 To support the *Model* a set of supporting products has also been provided by CT:
- Homelessness prevention and statutory assessment toolkits;
 - TA procurement policy;
 - TA predictive model and a TA control framework;
 - TA operating manual;
 - TA casework resources pack;
 - Allocations policy;
 - Business requirements for a Housing system;

LGA Evaluation and shared Learning

- 3.17 Upon completion of the project an approach will be agreed between Broadland and South Norfolk stakeholders, CT and the LGA for disseminating the findings of the project and proposed model more widely. As with other Housing Advisors Programme projects this could include providing masterclasses to support dissemination of both the method and model.

4. SERVICE BASELINE

Approach

- 4.1 This section draws together the findings of the fieldwork undertaken by CT (desktop document review, data analysis and stakeholder consultation) to understand current service pathways and how they meet current need, and the operating models and delivery processes that are currently converging within the *One Team* model. This analysis will form a baseline from which a *Best in Class* and highly innovative model can be built.



- 4.2 The *Service Baseline* comprises:

Approach: A review of the current access and delivery model for managing homelessness and the allocation of social housing;

Insight: A review of demand, causation, demographics and support needs, drawn from statutory returns and data held on the housing management systems of both Councils;

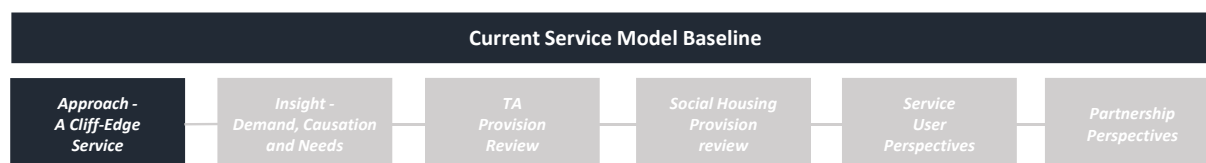
TA provision review: A review of TA demand in response to the Homelessness Reduction Act, and an assessment of both Council's TA portfolios, their configuration and cost-effectiveness, and the effectiveness of current procurement strategies in delivering the right TA at the right cost.

Social housing provision: A review of current access arrangements, registration and assessment processes, Housing Register management, allocations and lettings processes, and tenancy sustainment support provision;

Service user perspectives: Drawn from a digital survey of recently housed tenants of both Councils, highlighting their experience of the current customer journey;

Partnership perspectives: Drawn from interviews with senior and frontline staff from partner landlords, neighbouring District Councils, people-focused service functions of the County Council, and other service providers.

Approach – A Cliff-Edge Service



- 4.3 Under the current models operated by both councils (and by all Council) most residents in housing need initially to seek help through joining the housing register. A traditional housing register model only delivers housing solutions for a relatively small percentage of those registered. In addition, there is evidence nationally that many residents in housing need fail to register, having taken the view that they are unlikely to obtain social housing.
- 4.4 Others bypass the housing register route and present directly as homeless. Put simply the current housing register/statutory homeless service model, which is common to all local authorities, that people fail to access the service before needing housing help, and therefore fails to deliver practical housing help, advice and solutions for the vast majority of residents that have a housing need and this results in more residents approaching the council in crisis.
- 4.5 The table below demonstrates the cliff-edge nature of the service at both Councils, with the majority of individuals not seeking help until a point of crisis is near or has been reached:

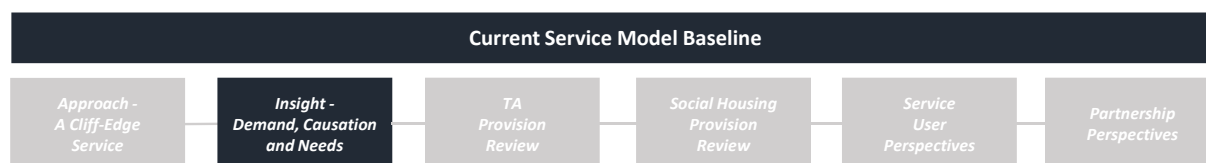
Applicant Status When Accessing Housing Team		
Status	Broadland	South Norfolk
Not at Risk (housing Advice Only)	8%	17%
At Risk (Relief Duty)	50%	33%
Homeless (Main Duty)	42%	50%

- 4.6 The current model is passive not proactive. The service waits for residents to approach the Councils and then filter help through a legislative focused lettings and homelessness system, built on rationing and means testing. This filter results in only a small percentage of the overall number of residents in housing need achieving a solution through the help of either Council, even though the Help Hub approach provides tailored support.
- 4.7 Furthermore, the model does little to encourage residents in housing need to be proactive, to adapt their behaviour to increase their chances of obtaining a solution. Many drift towards an inevitable housing crisis resulting in homelessness and an application under the statutory homelessness legislation. Each homelessness application might be viewed as a failure, caused by a system that all Councils have come to see as the norm.
- 4.8 The current model fails to promote and deliver resilience and self-help amongst residents in housing need. Common behaviours include:
- Many residents are unwilling to consider accommodation solutions outside of their immediate area because of family and social networks;
 - Few in housing need explore their housing options and plan their housing future

- There is, for many, a lack of resilience and lack of understanding of the principle of self-help. The Council is seen by many newly formed families as the solution to their housing problem, and that solution is only considered acceptable if it is social housing. If some are aware of the limited availability of social housing it is still considered obtainable through the route of becoming homelessness;
- National insight, but confirmed by housing officers locally, suggests that residents in housing need qualify for social housing on the basis of being able to demonstrate extreme housing need circumstances such as homelessness. There is no reward for residents in housing need who are proactive and try to help themselves. Academics have called the system "a race to the bottom" in order to receive help.

4.9 Those that try to be proactive face significant problems. All Councils largely focus on delivering help at the point of a housing crisis. There is little help available pre-crisis to support people to plan their housing future, or to overcome the challenges of securing accommodation in the private rented sector. Many can't afford a deposit and there is reluctance by many landlords and agents to accept tenants in receipt of benefits, or with small children.

Insight - Understanding Service Demand



- 4.10 To predict future accommodation needs across the two Councils, an understanding of the factors that influence demand is required, in particular the impact of the Homelessness Reduction Act (HRA) 2018 on homelessness applications and the demand for temporary accommodation. Logically, higher homelessness applications would normally evidence a need to plan for more cases requiring temporary accommodation.

Current Demand

- 4.11 Analysis of the Government's *Local Authority Homelessness Returns (2018 to September 2020)*, both Broadland and South Norfolk Councils have experienced a significant rise in homeless applications since the Homelessness Reduction Act was enacted in April 2018 is presented in the table below:

Total Homelessness Applications			
Council	Pre HRA: April 2017-March 2018	HRA Year 1: April 2018– March 2019	HRA Year 2: April 2019- Sept. 2019
Broadland	126	193	278 (120% increase)
South Norfolk	71	292	240 (238% increase)
Total	197	485	518 (162% increase)

- 4.12 Combining the figures for Broadland and South Norfolk, homeless applications have risen by 162% since the HRA was enacted, well above the 140% national increase for England.

Preventing and relieving homelessness

- 4.13 Where preventative casework is successful, fewer cases will require TA and, where relief casework is successful, more of the cases being accommodated in TA will leave at a faster rate. In contrast however, poor performance in preventing and relieving homelessness will result in higher numbers in temporary accommodation. This is an important issue to analyse for understanding how upstream solutions can result in better outcomes and to help predict how much Temporary Accommodation will Broadland and South Norfolk will need over the next 3 years
- 4.14 For both Broadland and South Norfolk performance is good. In respect of a successful outcome to the 'prevention of homelessness duty' is above the 'Eastern Region' and all England average based on the (MHCLG end of September 2019 HCLIC returns).

- 4.15 Performance for a successful outcome to the relief of homelessness duty is above the 'Eastern Region' average but, combining the figures for both Councils, is slightly below the all England average, as shown in the table below:

Successful Prevention Duty and Outcomes		
Council	Successful Prevention Duty Outcome %	Successful Relief Duty Outcome %
Broadland	69%	36%
South Norfolk	63%	41%
Easter Region average	56%	33%
England average	58%	40%

- 4.16 Taking the baseline figures, this is undoubtedly a strong performance by both Councils and this will have relieved pressure on TA. However, analysing the figures more closely there is evidence that raises concern regarding the sustainability of the current performance. The concern is that prevention and relief success has largely been achieved by diverting households into social housing rather than keeping people in the properties they have presented from and this may not be sustainable looking to the future.
- 4.17 Of the households recorded with a successful prevention outcome in South Norfolk in 100% of cases this was achieved through a move to alternative accommodation before the household became homeless, with 93% of that accommodation being a move into social housing. Put simply no cases were recorded as prevented through actions to help the household remain in their home and 93% were diverted into social housing before they became homeless. The '100% alternative accommodation prevention figure' is the highest recorded figure in England.
- 4.18 For Broadland the figures are a little better but still a concern. Of the households recorded as having a successful prevention outcome, in 76% of cases this was achieved through a move to alternative accommodation, with 64% of the alternative accommodation being social housing.
- 4.19 Both councils are fortunate in that social housing has to date taken the strain. So far, this approach has not had a negative impact on TA numbers, but there must be considerable doubt that this is a sustainable long-term strategy.
- 4.20 It may be possible to rely on social housing as the solution for another year or possibly 2, but this is not a sustainable strategy for suppressing numbers in TA indefinitely. Nor is it fair to other applicants in urgent housing need on the housing register who require social housing.
- 4.21 A failure to take action here may eventually see higher numbers in TA and higher costs.

Insight - Understanding Causation and Support Needs

- 4.22 Systematically recording and correctly interpreting the reasons why individuals and households approach the service, their demographic characteristics, and the support issues they may have, will provide the depth of insight from which the objectives and resources of the service can be focused to maximise outcomes.

Causation

- 4.23 The table below demonstrates that a significant percentage of households approaching the service do so from what had been a potentially stable home or sustainable tenancy, highlighting the need for supporting individuals to plan their own accommodation pathway, and to provide access to accommodation solutions that avoid a crisis intervention:

Main Causes of Homelessness	
Reason	Combined Councils
End of Private Rental Sector tenancy	25%
Friends or family unable to accommodate	20%
Relationship breakdown	15%
Domestic abuse or harassment	10%
End of Social Rental Sector tenancy	10%

Household characteristics

- 4.24 An increasing percentage of young and single people approach the service, for whom there is limited access to core interventions. To supporting the whole community to meet their housing needs, an understanding of how household form or remain hidden is needed. For example, nationally, there has been a 28% increase in 20-34 year olds living with their parents over the last 10 years, which will drive future demand. The table below demonstrates the demand on the service from single person and younger households:

Age Profile		Household Composition	
Age	Combined Councils	Household	Combined Councils
Under 26	22%	Single or couple	60%
Aged 27 to 56	63%	Family with 1 child	20%
57 and over	15%	Family with 2 children	10%
		Family with 3 or more children	10%

Economic Status

- 4.25 Currently, a significant proportion of individuals access the service from a position of relative economic stability (40% in work and 50% receiving no benefits). However, the impact of Covid-19 crisis on employment in the area, and in particular its impact on the gig economy and lower-paid seasonal jobs, may significantly increasing the urgency of need and level of financial hardship of those approaching the housing service.

Economic and State Support Status			
Economic Status	Combined Councils	State Support	Combined Councils
Full or part-time work	40%	No support	50%
Seeking work	15%	Housing Benefit	25%
Not seeking work (education or retired)	20%	Universal Credit	15%
Cannot work (long-term sick or disabled)	20%	Other benefits	10%

Primary Household Support Needs

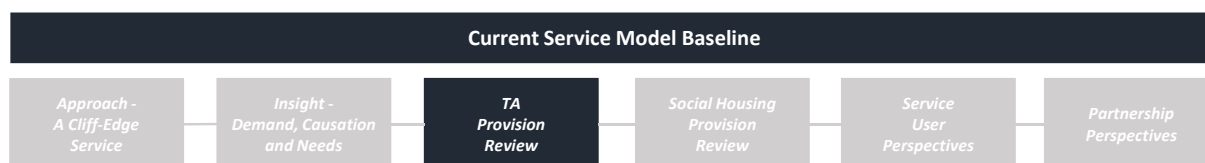
- 4.26 Currently, 40% of individuals approaching the service (across both Councils) identify a support need when they register, and again, in the wake of Covid-19, there will undoubtedly be a lasting legacy of mental health support needs and for building life skill amongst younger people who will be living at home for longer.

Primary Household Support Needs (of those needing support)	
Support Need	Combined Councils
Physical support	50%
Mental health support	25%
Younger person support (life skills, leaving care)	8%
Older person support (independent living)	7%

Building Insight

- 4.27 The level of insight gained through data collected by either service is limited at present and it is not clear how it drives planning and provision of the service, beyond the provision of statutory returns. The insight and experience of service users and service partners presented below helps to build out a more rounded picture of emerging need, particularly of younger people and those living with a mental health condition and finding it difficult to access support services.
- 4.28 Moving forward however, it is imperative to build a base of high quality insight to drive the new service model, providing the foresight needed to meet changes in demand and complexity of needs, rather than simply reacting to them.

TA Provision



Current demand

- 4.29 At the beginning of April 2020 there were 51 households placed in temporary accommodation across both Councils. Just over 30% were placed in accommodation outside of the Council area where they had presented as homeless from.
- 4.30 Despite the rise in homeless applications there has not been a corresponding rise for the number of households in temporary accommodation. In fact, numbers in TA have fallen in Broadland and have risen only marginally in South Norfolk, as shown in the table below:

People in Temporary Accommodation (provided to meet statutory)		
Council	March 2018 (last quarter before HRA)	September 2019
Broadland	59	29 (of which 15 are single people without children)
South Norfolk	11	20 (of which 12 are single people without children)

- 4.31 The analysis that the increase in homeless applications has not resulted in a significant rise in temporary accommodation would appear to go against the logic that higher applications must surely result in higher numbers in temporary accommodation. The explanation for why this is not the case is that prior to the HRA implementation, both Councils offered advice and prevention of homelessness help to customers without being required by the legislation to record this help through the means of a statutory homeless application.
- 4.32 What we can conclude on this question is:
- Homelessness applications have risen by 162% across the combined authorities and this is above the regional and national average;
 - However, the increased figure does not represent a 162% increase in presentations to both Councils as the rules for recording homeless applications have changed;
 - Nevertheless, there have undoubtedly been more people presenting as homeless in 2019/20 than in 2018/19 though it is difficult to accurately quantify what the real increase is. The figures recorded locally for new cases presenting for help are not sufficiently robust to be able to compare like-with-like with the figures for 2017/18;
 - Despite the fact that homeless applications have risen this has not fed through to a corresponding rise in temporary accommodation for either Council.

Predicting future demand

4.33 On the evidence set-out above, it is possible to conclude that despite the introduction of the HRA and the increase in homelessness applications, demand for temporary accommodation remains stable (rising from 11 to 20 in South Norfolk and falling significantly in Broadland) with a relatively small numbers accommodated by both Councils in comparison with Councils of a similar size and demography.

4.34 The specific reasons why the rise in homeless applications has not resulted in higher TA placements can be put down to the fact that:

Firstly, the recorded rise in applications is mainly for single people who have not been assessed as priority need and therefore are not owed a temporary accommodation duty and

Secondly, as is highlighted in the analysis above, both Councils are recording higher than the regional and national average figures for preventing homelessness which means households who would have required temporary accommodation have their threat of homelessness resolved before they become homeless and require TA.

Temporary Accommodation Portfolio Assessment

4.35 The current TA portfolio consists of accommodation that is Council owned, leased from private landlords or provided by Registered Providers. In addition, both Councils use *bed and breakfast* accommodation on a regular basis to provide emergency accommodation.

4.36 The TA portfolio at the 1st April 2020 consisted of the following stock:

Broadland Council TA Portfolio	
Council Owned	2 x 3 bed properties
Private Sector Leased	41 properties of various size including 2 x 4 bed
	1 x PSL leased 5 bed House of Multiple Occupancy
	Tustings: 5 x units leased from Clarion Housing
South Norfolk TA Portfolio	
Council Owned	Kestrel House: 6 x self-contained studio apartments for families, (all ground floor with wet room showers)
	St Andrews: 1 semi-detached 3-bed house, used for either for 3 x singles/couples (1 box room only suitable for a single person). 1 bathroom, 1 kitchen, 1 living room or can be used for 1 x large family
Private Sector Leased	The Manse: 6 x shared rooms, 3 bathrooms 1 large kitchen for singles or couples – 2 ground floor rooms, 4 upstairs, 1 communal lounge, leased from the Church

- 4.37 The large Private Sector Leased (PSL) portfolio (over 40 units) in Broadland is having a significant negative cost impact on the Council, with the net annual cost estimated at between £200 and £250k. Except for two Council-owned properties, PSL makes up the rest of the TA portfolio with bed and breakfast the emergency accommodation resource. Taken together Broadland is reliant on the type of TA that has the biggest negative cost impact. In comparison PSL accounts for 20% of the total TA portfolio on average for the rest of England.
- 4.38 The portfolio is more suited to longer-term TA placements. This is having a negative cost impact on the Council compared to the position before the introduction of the HRA. There are higher than budgeted for turnover rates and increasing levels of voids impacting on costs.
- 4.39 The business case behind the PSL procurement scheme for Broadland was based on a cost comparison with bed and breakfast costs. However, given the changes to DWP subsidy rules (2017) have had a negative impact on PSL schemes, there is a need to consider alternative models.
- 4.40 The two main forms of TA currently used to meet Broadland's emergency accommodation and second stage accommodation needs are forms of accommodation that have the biggest net financial cost to the Council.
- 4.41 For South Norfolk Council it can be argued that the TA portfolio is too small. There are only seven Council owned properties and six rooms/units leased, leaving the Council at risk of having to rely on costly bed and breakfast if there is an upturn in homelessness presentations. However, this is to some extent mitigated by the combined service model where TA resources can be shared across both Councils.
- 4.42 For both Councils there is a strong financial and operational case to suggest that the type and stock profile for the TA currently procured needs to change to respond to the impact that the HRA has had which is the need to procure more short term accommodation and less long term TA.
- 4.43 The balance between the need for short term emergency accommodation pending a decision on a homeless application, and longer term largely self-contained accommodation required to meet a full statutory homeless duty once accepted, has been impacted by the introduction of the two new prevention and relief duties and the flexible way these duties can be ended through 6 month accommodation lets of any tenure offered. Broadland and South Norfolk Council require additional short-term emergency accommodation and less long-term temporary accommodation.

TA Service Delivery

- 4.44 This section examines the current resource allocation models of the TA functions within the two Councils to assess how they can be best configured as a single service to meet future demand:

South Norfolk Council

- 4.45 There is no dedicated TA manager or team, with the function delivered across a number of resources, as follows:

Housing Solutions officers: Responsible for contacting Bed and Breakfast providers, completing risk assessments, charging sheets, and agreeing placements;

Administrative officer: responsible for some TA work (approximately 10 hours per week) along with a wide range of other administrative and support work. The TA administrative tasks include arranging contractors, cleaning rooms, and some maintenance functions;

Housing and Benefit Advisors (1.6 FTE): Provide intensive housing management and support for TA occupants, signposting mental health, social services, CAB, debt advice;

Housing Benefit Assessors (1.4 FTE): Process TA claims and assess housing benefit for other specialist accommodation including exempt and supported accommodation and Gypsy and Traveller site claims;

IT Systems officer (7.5 hours a week): Complete TA placement forms and set-up TA charges on the Abritas IT system.

4.46 **Broadland Council**

4.47 There is no dedicated TA manager, with the function delivered by:

Private Sector Leasing Officer (1 FTE): Responsible for most aspects of the Council's PSL scheme including management, sign ups, and managing contractors;

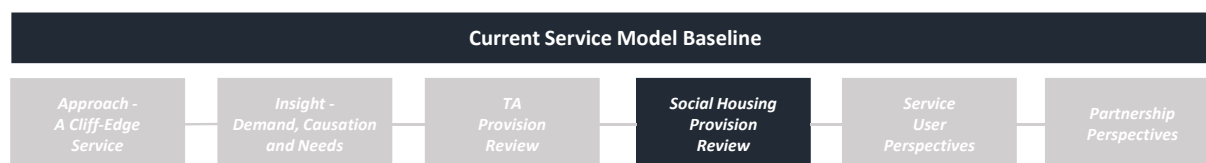
Housing officers (1.4 FTE): Responsible for TA placements, contacting bed and breakfast providers, set-up of charges and to record placements on the Jigsaw system.

4.48 Staff resources for the temporary accommodation function are not sufficient to deliver this critically important statutory function. Current structures are 'haphazard' and have evolved over time.

4.49 There is a lack of clarity regarding roles and responsibilities for TA, and gaps at both strategic and operational level. This is compounded by out-of-date operating procedures and working documents at both councils.

4.50 There is an urgent need to implement a new TA structure for the combined authorities and to operate from one location to ensure consistency, control and continuity. Any additional growth in TA staff resources can likely be met through increased MHCLG Government funding for 2020/21. This funding case is set-out in Appendix 2.

Social Housing Provision



Review of current model

- 4.51 The principles underpinning housing service provision and delivery currently followed by both Councils have shortcomings that work against the core principle of effectively and efficiently matching the right person and their needs with the right accommodation:
- From a service user perspective, the service is complicated and encourage *band chasing* and a *race to the bottom* to evidence urgent housing need whether it exists or not;
 - *Housing Need* is a relative concept and the Government's statutory definition of housing need as defined by the reasonable preference groups are outdated and do not fit with the market or supply position in Norfolk in 2020;
 - Dependency is encouraged and resilience is not promoted, with applicants being responsible for making tough decisions about their options and taking responsibility for solutions where they are able;
 - They do not sufficiently recognise the changing circumstances of applicants registering with many more in part time or full time work.

Allocations Policy

- 4.52 An Allocations Policy is the keystone of any housing service and dictates the operability and level of outcomes achievable, as it is delivered on the ground. key aspects of the Broadland and South Norfolk policies and delivery models are reviewed below to assess how a common allocations policy and delivery model might be constructed:

Qualification of applications: Only South Norfolk currently offer any on-line qualification of applications. The processes of both Councils need overhauling to maximise the level of on-line pre-qualification and provision of proof by applicants;

Assessment of need: In South Norfolk assessment is undertaken within the on-line CBL process, whilst in Broadland, this is a manual process undertaken against the homeless and allocations policies. Moving forward, a common approach is needed that removes any officer interpretation from the process, as it will be prescribed within the business system, which will guarantee transparency, but still permit auditable management discretion;

Banding: in our view, the banding models of both Councils have weaknesses, in common with many other local authorities, the Broadland Model (3 bands) is not broad or transparent enough and the South Norfolk model (5 bands) is too complex. Moving forward, a straightforward, transparent banding is required that will reduce the level of incorrect banding decisions and resultant level of challenge;

Notification of banding decisions: Formal, correctly justified written notifications of banding decisions must be consistently produced;

Local connection: Is problematic for both Councils, as evidencing connection in relation to an application is not granular enough and specific nuances are not recorded or considered;

Allocations by bed size: Whilst both services appear to operate in a compliant way, there is potential for missing rules, such as when a child turns 16 and is entitled to their own bedroom;

Medical assessment: Decisions are made in-house at both Councils, which puts pressure on non-medically qualified staff. Moving forward, if this arrangement is continued, an electronic medical triage form is needed to capture circumstances accurately, and a medical assessment script that will ensure the consistency and integrity of assessment decision making.

4.53 Both Councils are strong in safeguarding vulnerable residents, needs are identified early and coordinated through the respective *Service Hubs*. Both Councils are also strong in conducting home visits and also engaging appropriate support partners in supporting vulnerable residents (sourcing mental health support provision is however cited as being extremely difficult).

4.54 However, neither Council regularly arranges accompanied viewing for vulnerable residents. Also, the support status flags on systems used by either Councils are not clear, moving forward there needs to be clear distinction and consistency of use.

4.55 The management of the housing register is a problem for both Councils, with limited maintenance of individual applications or scheduled reviews:

Changes of circumstances: A manual process is followed at Broadland, whilst there is some self-service automation in South Norfolk. Self-service capability must be expanded and strengthened moving forward, as the gateway to any new service pathway;

Application reviews: Neither Council currently does no more than to review the homelessness cases on their lists there is no consistent approach or schedule for reviewing other cases. Housing registers are not therefore being maintained correctly and have significant numbers of obsolete cases. A definitive and audited review path is required going forward.

4.56 The approach to allocations and lettings in both Councils is generally robust, but needs strengthening in several areas:

Shortlisting: Both Councils can demonstrate a transparent, auditable approach to shortlisting;

Viewings: Neither Council uses multiple viewings, which may impact landlord void turnaround;

Sensitive lets: Both councils operate open and compliant processes;

Local lettings: Both councils operate open and compliant processes;

Offers: Both Councils rely on a verbal offer process, which may be open to re/mis-interpretation by applicants;

Reasons for refusal: Are recorded consistently by both Councils. However, greater consistency is needed when recording process bypass reasons.

4.57 Working with landlords to coordinate the letting of homes to those in most need, whilst minimising voids loss is challenging:

- The manual, nominations-based approach at Broadland means staff can often struggle to match applicants against a void quickly, which can lead to critical information such as sensitivities (witness protection for example) being missed. It is critical that landlords give 4 weeks' notice of new voids to allow a candidate to be matched;
- Landlords can be guilty of slippage in meeting expected hand-back dates, which can result in unfulfilled offers, particularly in homeless cases;
- The provision of lettings paperwork by landlords can also be slow, particularly in Broadland. A digital self-service portal for landlords will automate this process.

4.58 From a compliance and performance perspective, a number of critical weaknesses have emerged, that must be addressed by any new service model:

- The audit trail as to what constitutes a legal *offer* is not complete, as processes were streamlined as part of *lean-thinking* reviews – a full audit trail must be re-instated;
- Similarly, the audit trail of a customer's journey through the system is incomplete and is therefore not compliant;
- Extracting business information to drive performance reviews and to gain insight can be difficult, meaning services may not be performing or responding to changes in demand and needs appropriately;
- The configuration of the ICT solution at Broadland means that the reason recorded for an agreed banding is not transparent, a critical audit trail parameter.

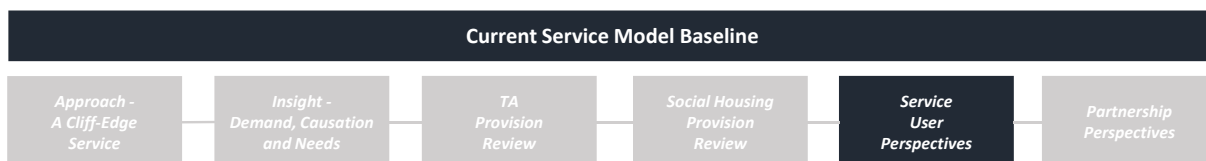
Review of current working practices

4.59 Current working practices have been assessed through a desktop review of policy and operational documentation and observations provided by frontline managers and staff. Many of the issues outlined below are already being addressed within the new *One Team* service model, but are recorded to enable the completion of the baseline analysis.

4.60 Frontline managers and staff recognise the need to rethink the operational and organisational design and converge policies, processes and working practices, to refresh business systems and review partnership working arrangements. Specific aspects of the current operating models that require rethinking are therefore to.

- Introduce a single way of working and to implement an organisational design that balances the number of specialist and non-specialist roles, to maintain service levels whilst focusing support on the most vulnerable;
- Reduce the number and increase the inter-operability of business systems and the processes they support, to reduce duplication and eliminate re-keying of information;
- Increase the scope of self-service functionality and eliminate manual processes.

Service User Perspectives



4.61 A web survey of 62 recent users of the housing service (out of 200 recently housed households contacted) has provided feedback on their experience of the service they received from Broadland and South Norfolk.

4.62 The primary reasons given for being on the register were:

Main Reasons Given When Applying For Housing	
Reason Given	% Respondents
Overcrowding	24%
Health and disability	18%
End of private sector tenancy agreement	13%
Homeless	11%
Affordability	8%
Family break-up	8%
Unable to continue in family home	5%
Downsizing	5%
Change of accommodation need	3%
Safeguarding issues	3%
End of social housing tenancy	1%
Disrepair of current home	1%

4.63 70% of respondents said they were familiar with the Allocations Policy of their Council and almost 80% said they were familiar with the banding system operated.

4.64 Over half of respondents were housed within six month of being placed on the Housing Register, with a further quarter placed in under a year. Only 6% of respondents said they had to wait for more than 18 months to be offered accommodation.

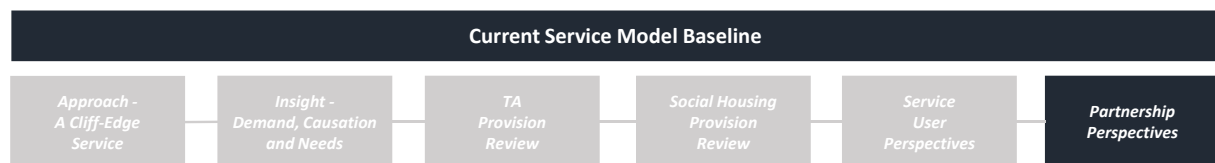
4.65 Assessment letters sent to respondents were universally viewed as being accurate and reflective of their circumstances, however special circumstances could have been better reflected. 21% of respondents asked for a review of their application, mostly because the applicant didn't agree with the banding allocated to them. Upon review, two-thirds of the original banding decisions were adjusted, which suggests weaknesses and inconsistencies in the assessment and banding process.

- 4.66 45% of respondents said they had to contact the housing service whilst they were on the Housing Register and of those that did, 28% did so once, 50% did so up to 5 times, 15% did so 5 to 10 times and 6% over 10 times. The main reasons for contacting the service were:

Main Reasons for Contacting Housing	
Reason	% Respondents
Information	23%
Status check	23%
Banding query	22%
Change of circumstance	18%
Bidding query	11%
Support need	3%

- 4.67 The effectiveness of the service response to an enquiry was mixed, with only 46% of enquiries resolved at the first point of contact.
- 4.68 Just over half of respondents (54%) accepted the first offer they received and a further 38% accepted the second. Reasons for refusal vary, from the property being unsuitable, not in a preferred location, or not ready. Almost 85% of respondents agreed that their Council had taken their views into account when making an offer.
- 4.69 Most respondents felt that the bidding and lettings process was well supported, but 20% were unaware of the need for an affordability check. Sign-ups were generally completed within a week.
- 4.70 Overall, most respondents were happy with their new home and the service they received from the Council and the landlord. However, the level of decisions upheld on re-banding enquiries and the number of contact made to chase progress, demonstrates that there is considerable scope to digitise (change of circumstances) and streamline (bidding and lettings) many aspects of the service.

Partnership Perspectives



- 4.71 Through a set of one-to-one interviews, partner landlords report a positive day-to-day working relationship with the two Districts, particularly when combined with regular co-working. They also report good access to and support from the wider housing and benefits services.
- 4.72 Landlords perceive that both services have sought to seek a balance between applicants in priority need and those who are not, and exercising fairness on a case-by-case basis. Both the nominations and choice-based lettings allocation policy approaches are perceived as having strengths and weaknesses (the former allowing for the placement of sensitive lets and the latter for enabling choice and driving greater efficiency), the adoption of a joint, a blended approach moving forward that combines both approaches would be welcomed.
- 4.73 Whilst the delivery of the service is seen as good overall, specific operational issues were raised that need to be considered in designing and operating the new housing service model. When working as individual services, the small support teams could struggle to maintain service levels and continuity during periods of staff absence, particularly when processing a release of new-build homes. Customer data and insight can sometimes be of poor quality or out of date, which can result in refusals and consequently increase void turnaround times. Waiting lists do not appear to be not refreshed or applications reviewed on a regular basis.
- 4.74 Most formal arrangements and service levels date back to the original stock transfer agreements or to when the stock was released by the developer and landlords recognise that they no longer provide a framework to manage the relationship. For example, processes for the disposal of hard to let or unsuitable properties are slow and do not allow landlords to react quickly to changes in accommodation demand or need.
- 4.75 Landlords recognise that their relationship with the Councils is primarily transactional at present, operating on a case-by-case basis, with risk transferred wholesale from one party to the other as a letting is made, with little follow-up or continuity of caseworking to support more vulnerable tenants, this leaves landlords with few options but to evict where tenancies fail, perpetuating the *revolving door* of homelessness. To this end, defining more holistic, partnership-based relationships, centred on sharing risk and the needs of the individual would be welcome.
- 4.76 More widely across Norfolk there is a recognition that whilst local authorities and providers have sought to do the right thing, this has often been without coordination or within an overarching governance framework, and consequently, previous partnership approaches have often broken down.

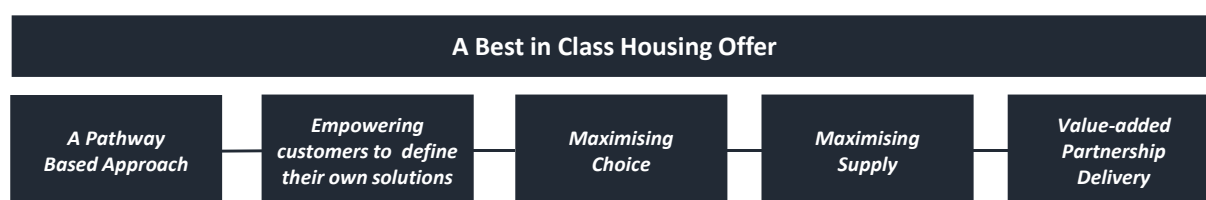
5. FACING THE FUTURE

New Thinking Needed

- 5.1 The impact of Covid-19 will undoubtedly drive additional demand and reduce income across all Council services. Specifically, a significant rise in unemployment could cause homelessness as residents' default on their rent and mortgage payments. There is already evidence of increased levels of domestic abuse and more people experiencing mental health problems. All of these factors may result in more homelessness for families and individuals.
- 5.2 The financial costs of delivering the homelessness service for significantly more households will increase the cost of temporary accommodation to a level unknown in both Districts. A large increase in temporary accommodation costs has the potential to place the Councils at risk of a section 114 notice if funds run out, unless the Government provides substantial additional financial support.
- 5.3 It may not therefore be an exaggeration to state that without applying new thinking in regard to the way housing advice, homelessness and social housing provision is delivered in Broadland and South Norfolk, the financial impact could put financial viability at risk. A sit back and wait approach is not an option. There remains a legal responsibility to deliver housing advice but there is also a financial imperative for the two Councils working together to deliver more effective housing help to all residents in housing need if we are to avoid the inevitable journey many residents will make towards a housing crisis and homelessness with the calamitous financial impact this will have on Council finances.

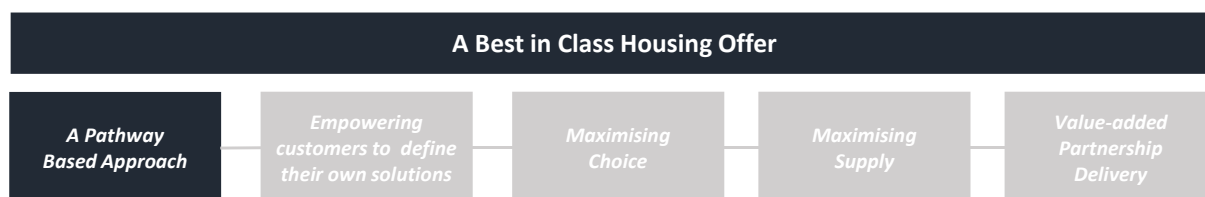
Defining a Best in Class Housing Offer

- 5.4 Broadland and South Norfolk have a unique opportunity to build a ground-breaking *Best in Class Housing Offer* that would be transformational, changing the culture and approach for supporting residents in housing need to find solutions, based on a *Pathway* based approach.



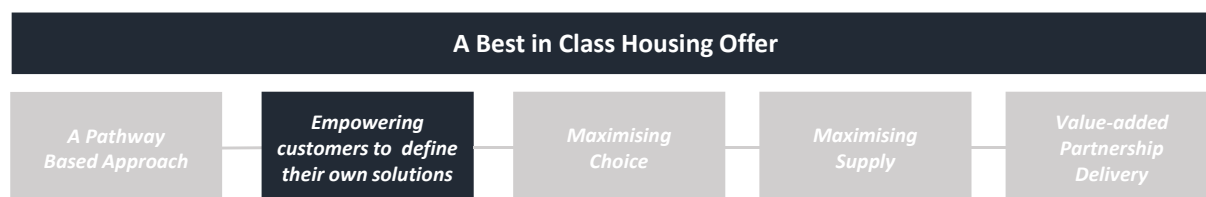
- 5.5 The components of a *Best in Class* Housing Offer for Broadland and South Norfolk are:
- A Pathway based approach:** With housing options defined along a pathway open to all;
- Empowering customers:** To define their own solutions through self-service and self-referral;
- Maximising choice:** Providing a *marketplace* of housing options to anyone in housing need;
- Maximising supply:** By creating a single, extended pool of available accommodation;
- Value-added partnerships:** Focused on the early intervention and provision of wraparound support that remains with a household until they can sustain a long-term tenancy option.

A Pathway Based Approach



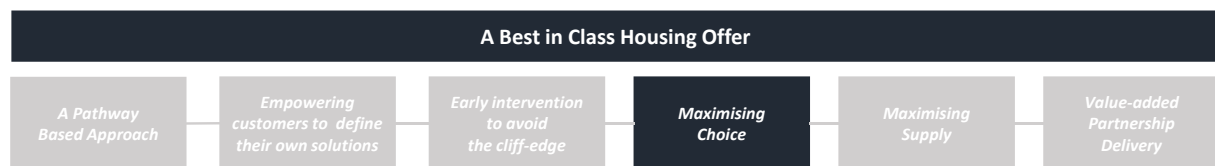
- 5.6 A *Pathway* based approach will shape a holistic response to help all residents in housing need, as the full impact of Covid-19 becomes apparent and Councils have to respond to the impact on housing and homelessness of the most severe economic recession in living memory.
- 5.7 A new innovative *Accommodation Pathway Model* will not only meet the combined council's TA statutory needs but also delivers substantially more accommodation options. Built around three core components it would provide:
- Suitable emergency accommodation to meet statutory TA duties;
 - Short term, 6-12 months, second stage accommodation providing support and stabilisation where required to help prepare households for longer term housing solutions;
 - Longer term settled housing either into Social Housing, the PRS, or property purchase products such as Rent to Buy, that provides long -term sustainable accommodation that reduces the chances of households representing as homeless and with support provided where needed to minimise the chance of eviction.
- 5.8 Some households would not require second stage accommodation as they would not have any vulnerabilities that require support and stabilisation before they were ready to move onto long term settled housing. The *Pathway Model* is intended to reduce the likelihood of more vulnerable households representing as homeless.

Empowering customers to define their own solutions



- 5.9 Housing supply should no longer be structured to focusing on one product only - social housing, recognising that this traditional model fails to respond to the reality of limited supply. Continuing to deliver a traditional housing register model focused on social housing alone reinforces the behaviour whereby residents are unwilling to consider other housing solutions.
- 5.10 The intention would be for the *Accommodation Pathway* to become accepted as a new essential public service for all residents in housing need in Broadland and South Norfolk regardless of whether they meet the statutory means tested categories of housing need.
- 5.11 Unlike the current register, it would proactively encourage residents in housing need to apply in order to capture as many of the families, couples and individuals living in the Districts who have a self-assessed housing need now, or are likely to have a housing need in the near future.
- 5.12 Having captured the real housing need across the two Councils the aim is to deliver a self-service *Marketplace* to help residents access a far wider range of accommodation solutions facilitated through the actions of the two Councils. Interventions would consist of light touch *enabling*, or direct *intervention*. The overall objective is to prevent as many residents as possible needing to present as homeless and in crisis. This will ensure that Broadland and South Norfolk are able to manage the costs of homelessness despite the impact of Covid-19.
- 5.13 The solution will seek to implement a comprehensive strategy for preventing homelessness through helping far more households to remain in the home where they have presented from where this is safe. This also reflects the Greater Norfolk housing strategy.

Maximising choice



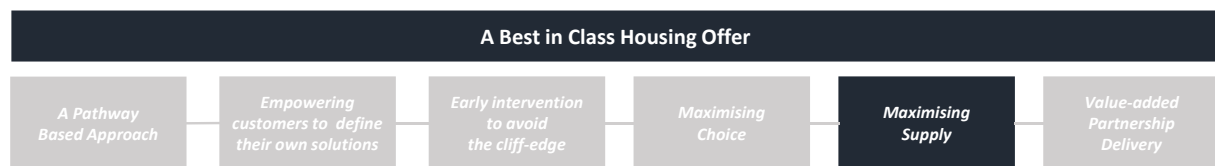
- 5.14 There is a need to maximise the pool of accommodation available to the Councils to meet or end its statutory duties. At present there may be a risk of a silo approach with units of accommodation designated as TA and other work streams seeking to develop schemes to increase PRS move on options such as developing a social letting agency.
- 5.15 The objective would be achieved by developing the concept of a *Marketplace* creating a pool of accommodation maximising the number and type of PRS accommodation units available to the Council to meet or end any of the statutory prevention and relief duties as well as providing an alternative accommodation option that can be used for TA.



The *Marketplace* property pool could be administered through a newly restructured Accommodation Pathway Team, property would be sourced and used flexibly:

- To end the new HRA duty to prevent homelessness and thereby preventing the need for a household in priority need to require TA;
- To contribute to the TA portfolio to meet any interim TA duties;
- To end the new HRA duty to relieve homelessness for any household in priority need who has been placed in TA and owed the new 'relief of homelessness duty';
- To end the final main duty for any household where the relief duty has come to an end and a full final homelessness duty has been accepted on the basis that the applicant is in priority need and not intentionally homeless.

Maximising Supply



5.16 An *Accommodation Pool* could consist of:

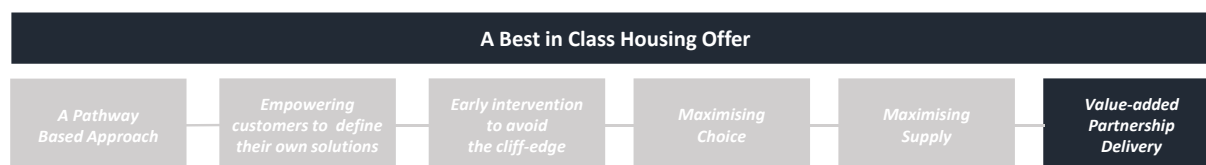
- All private rented sector accommodation sourced by the Accommodation Pathway Team
- Supported Housing Units where the Council is able to control access
- Any third sector hostel provision where it has been negotiated that this accommodation should form part of the marketplace.
- New initiatives such as accommodation procured through a Social Letting Agency
- New initiatives delivered by Registered Providers and Developers such as build for market rent.

5.17 The use of properties in the pool would be flexible so that properties can be switched from one use to another to meet the operational needs at any given time. So for example, a hostel space available through the pool could be used to end the new prevention duty for applicant A and when that unit became vacant again through the move on component of the accommodation pathway, it could be used to meet an interim TA duty for applicant B, or to end a relief of homelessness duty for applicant C who may be in TA.

5.18 A strategy is needed to open-up the private rented sector for households that cannot remain in their home. For households where this is not possible and homelessness cannot be prevented there is a need to develop an accommodation pathway that not only meets the temporary accommodation needs for both Councils, but also delivers far more private rented sector solutions and properties that can be used to successfully prevent and relieve homelessness. This will take the pressure off social housing and minimise the risk of temporary accommodation rising.

5.19 The new model will have the additional benefit of providing a more comprehensive picture of total housing need in both Councils, allowing Registered Providers and the Council to strategically plan housing provision.

Value-added partnership delivery



- 5.20 The commitment of Staff and Members of Broadland and South Norfolk to delivering a housing-led response to the COVID crisis within the new *One Team* structure is recognised as a potential key to unlocking a new holistic service vehicle with a wider shared service vision across the public realm.
- 5.21 Landlords are keen to review and formalise working arrangements that better reflect the post-Covid-19 operating environment, make better use of resources and deliver enduring outcomes:
- Work within a flexible policy framework that accommodate the needs of the Districts and the landlords;
 - Enables landlords to model accommodation portfolios and manage stock disposals to ensure the supply of accommodation can meet demand and type of need;
 - Facilitates an end-to-end customer journey underpinned by streamlined digital processes;
 - Better manage risk and pressures across the whole system;
 - Achieves better and longer lasting outcomes for people by providing tailored support offers and coordinated caseworking;
 - Makes people less reliant on service interventions and support.
- 5.22 More widely across Norfolk, commissioners and providers recognise that Covid-19 must act as a catalyst for joining-up disparate service elements around an individual, with a housing-centred approach and coordinated early intervention as key drivers. They also see the imperative of acting more strategically when planning and coordinating the delivery of services, to optimise resources, plan more coherently, and create lasting outcomes for individuals that ultimately reduce demand over time, as their resilience increases and reliance on core services decreases.

6. THE ACCOMMODATION PATHWAY MODEL

A housing first

- 6.1 The Broadland and South Norfolk *Accommodation Pathway Model* will be a first of its kind in the UK to deliver a holistic housing service to the whole community regardless of their immediate need, with the aim of enabling them to plan for their long-term accommodation needs with a realist set of options, whilst supporting those who reach a point of crisis to re-establish and sustain a suitable home.
- 6.2 The objectives set for the *Accommodation Pathway Model* might sensibly be to:
- Deliver an essential new service for all residents in housing need with no resident excluded and to ensure support is available through *assisted choice* for vulnerable applicants who cannot help themselves;
 - Deliver solutions based on greater transparency, simplicity and fairness, and that delivers solutions for the majority in housing need not the minority;
 - End the race to the bottom whereby the system encourages people's behaviour and actions to make or present their housing situation in the worst circumstances in order to obtain help;
 - Increase mobility across and outside of the Broadland and South Norfolk area;
 - Deliver cost savings that can be re-invested in support solutions.
 - Deliver innovation that places Broadland and South Norfolk at the forefront of new thinking for delivering housing advice, homelessness and social housing provision;

Service Promise

- 6.3 A suggested set of core principles to underpin the model would be enshrined in a *Service Promise*:
- Provide clear information to enable residents to make informed choices, covering housing products they do or may qualify for in the social, market and private rented sectors and realistic estimated waiting time for each product;
 - Provide details on where in the areas covered by the two Council's they have the most realistic chance of obtaining housing including facts on the type of tenure or tenures they have the best chance on obtaining;
 - Promote resilience through emphasising *rights and responsibilities*. This means everyone in housing need in Broadland and South Norfolk should have a right to realistic housing help and a level of choice, but must be prepared to take more responsibility for resolving their housing problems, with the facilitation and support of the Council acting as an enabler rather than as a constant provider;
 - Protect vulnerable individuals and households who cannot take any responsibility for resolving their own housing problems.

The Accommodation Pathway Model

- 6.4 The *Accommodation Pathway* will provide a universal service open to all with a housing need. A self-service *Marketplace* will enable the majority of households to resolve their accommodation needs before reaching a point of crisis and requiring service intervention. Where this is not possible the service will proactively work to prevent homelessness and where this cannot be avoided provide suitable emergency accommodation, with support provided to enable individuals to build resilience, and secure and sustain long-term accommodation solutions and to break cycles of homelessness or eviction.

Broadland and South Norfolk Accommodation Pathway Model				
Accommodation Pathway	Stage 1: Marketplace	Stage 2: Prevention	Stage 3: Stabilisation	Stage 4: Resolution
Stage Objectives	Self-identification of Needs & Homelessness Risk	Prevent Crisis & Maximise Outcomes	Provide High Quality TA & Support	<i>Break the Cycle</i> Tenancy Sustainment
Service Offer	Service Promise	Enabling Solutions	Direct Intervention Solutions	Wraparound Support
Accommodation Pool	Emergency Accommodation (Statutory TA)	Short-term Accommodation (Follow-on Support)	Private Rented Home (Sustainable)	Social Rented Home (Sustainable)

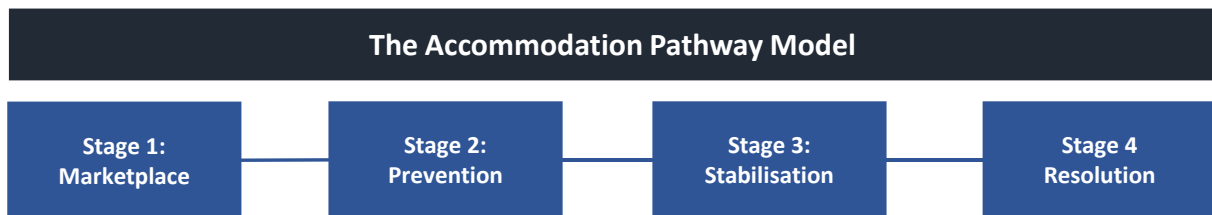
Stage 1 Marketplace: Provide digital self-help for the majority in housing need, and with early intervention for residents to remain in their homes, or who may be too vulnerable to help themselves. There are two components to Stage 1. Firstly, to encourage residents to self-identify their housing need and begin to plan their housing future based on a *Personal Accommodation Pathway*. Secondly to Identify housing need risk factors that may precipitate housing crisis or homelessness and deliver effective help based on the principle of self-help and resilience for those able to help themselves and proactive help for those more vulnerable.

Stage 2 Prevention: Prevent homelessness at the point of crisis to maximise positive outcomes for those who present at the crisis point of being at risk of imminent homelessness.

Stage 3 Stabilisation: Provide excellent temporary accommodation for those owed a statutory duty and additionally provide support and stabilisation for those who require more help to resolve problems that are more than just the need for a roof over their heads.

Stage 4 Resolution: To permanently resolve the housing needs of individual and households whether they are receiving formal interventions or owed a statutory temporary accommodation duty, by delivering realistic, and suitable accommodation options across all tenures, and to break the cycle of the revolving door of eviction and homelessness by helping them build resilience and skills to sustain long term accommodation solutions.

Stage 1: Marketplace



6.5 *Marketplace* will enable self-service exploration of available housing options, support self-registration to access an available option, with early targeted access support for the more vulnerable.

Marketplace - objectives

6.6 *Marketplace* has three primary objectives:

- To deliver effective and practical housing options and advice to all residents in housing need to help them to make timely and realistic decisions about their housing options and to plan their housing future. Help based on the principle of self-help for those who are able to help themselves and early intervention actions for those who are too vulnerable to help themselves.
- To identify those most at risk and take proactive action to protect the most vulnerable individuals and households who are not able to take responsibility for resolving their housing problems. This will involve early identification of housing need 'risk factors' that may result in a housing crisis, or homelessness.
- To encouraging residents to self-identify their housing need and plan their housing future through the support provided by the service through its enabling role.

6.7 Delivering the practical help in stage 1 would be framed around an interactive website where residents could register their housing need and explore accommodation options for meeting their accommodation needs both now and in the future. Residents would be able to build an *Accommodation Options Plan*. This might contain several accommodation phases applicable to their personal and financial circumstances.

6.8 *Marketplace* would best be delivered through remodelling of the housing application and housing register website so there is one point of access for residents wishing to register their housing need. It would need to be rebranded to give the clear message that a resident is registering not just for the social housing register but also to gain access to a wider marketplace of accommodation options and solutions across all tenures.

6.9 Key messages to deliver to all residents in housing need through Stage 1 are to:

- Remain at home as long as possible and save-up to move;
- Understand the costs of living independently and not leave home too soon before a) they can afford to live independently, and b) they can manage living independently;
- Always to plan a housing move rather than move.

Marketplace – digital service offer

- 6.10 Residents will be expected and be able to service their own needs through accessing through their on-line account all the information they need to answer any queries they may have and to make adjustments to their choices. The information would include their position in the queue and housing prospects for any housing product they have opted for and the estimated waiting time for all the housing products qualified for on self-registration.
- 6.11 Texts and emails would be automatically to inform applicants of their prospects based on the choices they have made and whether their prospects would be improved if they amended their choice
- 6.12 New and emerging social housing products such as rent to buy, market rented social housing and shared ownership would be promoted by direct marketing information (text, email, social media, written posted) sent directly from the housing team and the Registered Social Housing providers themselves.

Marketplace - enabling roles

- 6.13 The enabling role of Broadland and South Norfolk at Stage 1 could be fulfilled through a range of low cost help and support options, avoiding the need for interventions that are likely to be higher cost, as they involve significant time input from specialist officers.
- 6.14 Based on the information provided by an individual, Marketplace will personalise self-help housing advice and downloadable resources that address problems such as tensions at home, negotiating rent with a landlord, and how to find a room as a lodging.
- 6.15 Self-service software will enable residents to produce their own bespoke *Accommodation Options Plan*. This would cover social housing prospects, renting, sharing, shared ownership, extended family, or moving in or together with friends.
- 6.16 *Marketplace* will also deliver relevant complementary service information, sign-posting and service access, reflecting the face-to-face and telephone services currently delivered by the *Support Hubs*. This would include a wide range of services such as debt and money advice, adult social care and could be expanded to include services enabling residents to save for a rent deposit through a credit union or similar schemes.
- 6.17 A range of pre-tenancy courses could also be delivered digitally (through or in partnership with housing associations), with certificate upon completion to demonstrate the core knowledge, skills and commitment needed to manage a tenancy. This would improve their chances of being accepted by a private or social landlord.
- 6.18 *Marketplace* could also deliver Interactive functions to encourage people to think more realistically about where they wish to live and type of tenure based on behavioural psychology. The aim is to encourage people to think of housing solutions that are not all about social housing and help residents to think about the advantages of mobility across the Districts and Norfolk as a whole.

6.19 *Marketplace* would provide access all available housing products in one place with the intention that it would become the first place to go for all residents in housing need:

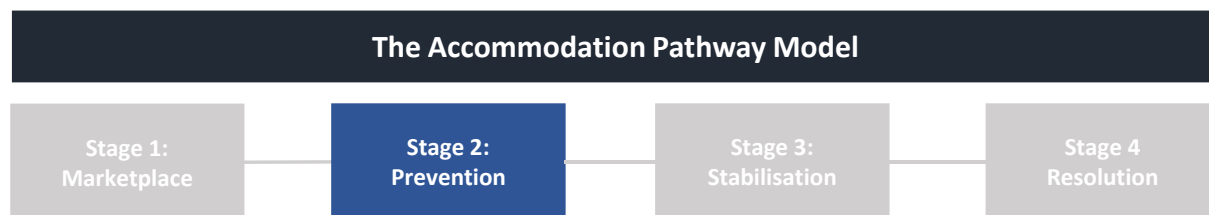
- Social rented housing in each Districts and elsewhere;
- Older person housing;
- Affordable rented housing;
- Intermediate rental homes, potential resale and shared ownership schemes
- For sale housing including private sector landlords who have been encouraged to let through the portal, and shared ownership opportunities and criteria to qualify;
- New rural development schemes and section 106 criteria Renting - sharing together;
- Moving in with family and friends;
- Lodging with a resident landlord schemes.

Marketplace – direct intervention role

6.20 Examples of direct interventions that could be adopted by Broadland and South Norfolk at Stage 1 are explored below' including their cost implications:

- Rent deposits could be offered at this early help stage when residents are largely planning their housing future and for the majority their circumstances could be described as a 'wish to move' rather than a need to move. However, a universal promise of a rent deposit or rent in advance would be unaffordable. Residents instead should be encouraged to save up for a rent deposit or rent in advance.
- The affordable housing 'pot' funded through section 106 planning gain could be re-prioritised deliver more semi-independent living schemes such as YMCA/Foyers type schemes, alongside new traditional social housing;
- There is a strong case for using analytics to create a data warehouse that combines council-wide business intelligence (housing, benefits, council tax, ASB, troubled families etc) to produce predictive models identifying households most likely to be at risk of homelessness and enable early intervention. This raises several questions:
 - How does this fit in with the objective of encouraging resilience and self-help?
 - If over-used it removes any responsibility for residents to take action to help themselves
 - It could potentially 'overrun' the service with cases at risk of homelessness sometime in the future, but if targeted at residents who cannot help themselves it could be a useful tool in preventing a future homelessness crisis;
 - A compromise might be to use predictive modelling to deliver signposting help for residents who are assessed as being able to help themselves, with more direct interventions for those assessed as more vulnerable.

Stage 2: Prevention



Prevention - objectives

- 6.21 *Prevention* will seek to keep high risk households who have self-identified in *Marketplace* from reaching the point of crisis and to maximise positive outcomes for those who present to the service as being at risk of imminent homelessness.

Prevention – enabling role

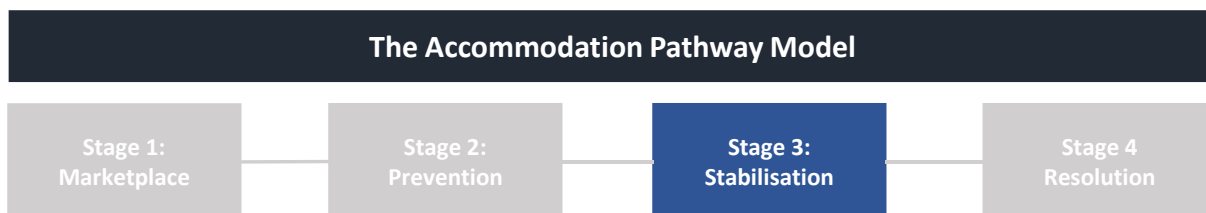
- 6.22 Much of the package of enabling activity outlined in Stage 1 will still be relevant to households at Stage 2. However, given the imminent risk of homelessness, caseworkers would need to be more proactive and directive when working with residents in order to prevent them losing their home, or to support them to find something else before they reached the point of becoming homeless. For example, residents would be not only be encouraged but expected to consider housing solutions that are not all about social housing.
- 6.23 Enabling families to remain at home and wait for social housing rather than become homeless is an option that could be delivered as part of the review of the allocation policy. The aim would be to remove the majority of family exclusion cases from the homelessness and temporary accommodation process through granting priority under a *new generation housing need category* on the housing register. This *deal* is a more honest approach and removes the need for some residents to collude to claim to be homeless. It involves a longer wait but a social housing outcome at the end of that wait and more choice over where that offer is. In contrast becoming homeless is likely to result in a private rented solution as opposed to social housing and limited choice over location.

Prevention – direct intervention role

- 6.24 The accommodation offer that is best for Broadland and South Norfolk and for residents, is to support people to remain at home for the longer term or long enough for the resident to plan their accommodation move. There will be direct costs in order to achieve a successful prevention outcome and decisions will be needed on who should be able to access direct financial support. The Support Hub role would be expanded to provide this support.
- 6.25 For example, a *Prevention of Homelessness Fund* could help resolve the trigger cause, that is the reason for the threat of exclusion, which could either be a grant or a loan. A decision would be required as to whether such payments would only be available to residents in priority need (and therefore would require temporary accommodation (TA) if homelessness cannot be prevented), or whether funding would be available to all residents at risk of homelessness regardless of whether there would be a TA duty if homelessness cannot be prevented.

- 6.26 Taking a specific common presenting problem, where private rented tenancy and social housing cases at risk of homelessness due to rent arrears. How much financial responsibility would Broadland and South Norfolk take to resolve the rent arrears, to pay off all or part of the arrears, arrears in full, or brokering a negotiated solution between landlord and tenant but not offering any payments to resolve the problem.
- 6.27 Where homelessness cannot be prevented an accommodation offer could be based on providing financial support to pay for rent deposits or rent in advance, either through a grant or a loan. Funding could be made available to priority need cases only or all to applicants owed a prevention duty including all single people. The *Discretionary Housing Payment Fund* could be 'top sliced' so that an agreed proportion is targeted for deposits and rent in advance payments.
- 6.28 Ultimately, a balance needs to be struck between funding accommodation at the prevention stage against placing the onus on the individual to find accommodation.

Stage 3: Stabilisation



Stabilisation - objectives

- 6.29 *Stabilisation* will deliver excellent temporary accommodation for those owed a statutory duty plus the provision of wraparound support for those who require more help where problems are more than just the need for a roof.

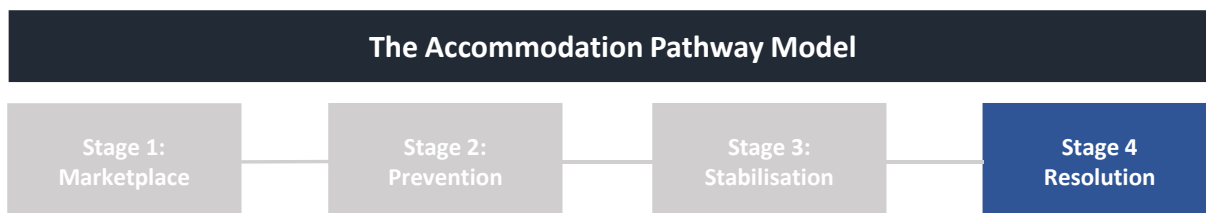
Accommodation offer – enabling role

- 6.30 Given that Stage 3 covers accommodation provided under a statutory duty in the form of temporary accommodation, many of the actions will come under the direct intervention rather than enabling. Caseworkers will need to be directive when working with residents in order support them to find accommodation. Homeless residents would be expected as well as encouraged to consider housing solutions that are not all about social housing.

Accommodation offer – direct intervention role

- 6.31 The TA offer at Stage 3 should aim to achieve the following key objectives:
- The accommodation provided should be of excellent quality and meet the needs of the household being housed;
 - The use of bed and breakfast should be minimised;
 - Procurement should be targeted at the locations from where most households present as homeless;
 - TA should include access to support where required.
- 6.32 TA Provision is covered in detail in the following section.

Stage 4: Resolution



Resolution - objectives

6.33 *Resolution* has two objectives:

Resolving homelessness for all applicants regardless of whether they are owed a statutory temporary accommodation duty through delivering realistic, and suitable accommodation options across all tenures;

Breaking the cycle of the revolving door of homelessness and of short-lived, broken tenancies by ensuring that solutions are sustainable and long term;

6.34 These actions are underpinned by the following key principles:

- Solutions to homelessness will be realistic and suitable, but not every solution can be accommodation that is long term;
- Some solutions will be short term with the applicant using the time in such accommodation to plan what their realistic next move should be;
- Unless someone is vulnerable and unable to help themselves, all applicants should be expected to make the same decisions as other B and SN residents about where they can realistically afford to live and the type of tenure available to them.

Resolving homelessness

6.35 The approach will largely be through direct interventions given the legal duty to help resolve homelessness but there will still be enabling principles that underpin the approach.

6.36 The aim would be to deliver an *Accommodation Finding Model* tailored to find a solution based on a homeless resident's informed choice. Sticking to the principles of resilience residents would access *Assisted Support* to deliver solutions. This would be based on a far more structured accommodation solution focused interview than currently delivered through the personal housing plan interview process.

6.37 It might be best described as a personal shopper type model linking to a social lettings agency (outlined in the following section) tasked with securing private rented accommodation in any area that the caseworker and the resident agree is realistic and affordable. This may include areas elsewhere in Norfolk or beyond.

6.38 The new approach would be based on the following core principles:

- Residents should be given all the information available to freely identify what accommodation options are realistic and affordable;

- The service will be based on working with applicants and not initially forcing them to take accommodation options. However, if applicants fail to engage through choice Broadland and South Norfolk could discharge any statutory accommodation duty under the final offer legal process if no solution can be agreed or, if agreed, found;
- Residents will be offered the new service and supported to secure any accommodation options in whatever area that is affordable based on a clear discussion and at this stage acceptance by the client;
- They will receive bespoke practical help and materials to help them secure including information on any guarantees re deposit, rent in advance, landlord incentive package, etc.;
- Residents would be given self-help tools and provided guarantees backed by the council to achieve resolution. For example, a rent deposit or rent in advance scheme.

6.39 The casework team would be fully trained in motivational interviewing. Among the techniques to be applied would be:

- Emotional resilience for staff and customers;
- Applying psychological principles and approaches such as, CBT, and motivational interviewing;
- Creating an enabling environment where applicants see the realistic housing options offered as an opportunity and not second best or options of last resort;
- Bringing about a cycle of change in client behaviour.

Breaking the cycle

6.40 A focused support and enabling role played by the service will ensure a positive exit from the Homeless Service for all individuals to minimise the risk of the revolving door of homelessness. At the point homelessness is relieved every applicant would receive a bespoke *Accommodation Sustainment Plan*.

6.41 For all applicants whose homelessness has been resolved their sustainment plan would include information on how and who to contact if they encounter any further housing problems and the need to act quickly and not to leave a problem too late so that it results in a crisis.

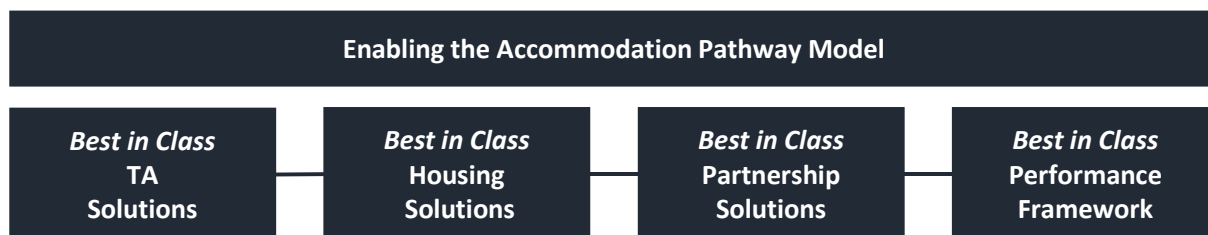
6.42 For applicants where their housing problem was assessed as more than just needing a roof, they will receive ongoing support. Support could be short term whilst they manage the transition from homelessness to settled housing or longer term where they require more intensive support to maintain their tenancy. This would be set out in a formal support plan in collaboration with partners, with a clear timescale for how long support will be provided.

6.43 For applicants where the homelessness duty has been ended with short term accommodation of only 6 months, they will receive a plan on how through their own actions they should

continue to secure the accommodation provided and if this is not possible to use the 6 months to obtain a move on.

- 6.44 This will mean that those households that only need a light touch sustainment plan know what they should do if they were to experience further problems. In contrast those vulnerable families and individuals where their needs are significantly more than just needing accommodation will be supported through a 'hub and spoke partner model, as they exit homelessness with a more detailed sustainment plan.
- 6.45 On-going support would be through a hub-and-spoke model. The model would promote more effective partnerships to deliver the wraparound services that some residents will need to sustain their accommodation targeting a resident's mental health, general health, and employment needs and ensure these are addressed in a joined up holistic way.

7. ENABLING THE ACCOMMODATION PATHWAY MODEL



- 7.1 To make the *Accommodation Pathway Model* a reality, existing service offers, operating models, supporting business systems and partnership relationships need to be re-thought and re-aligned to create a holistic housing solution that can best address future demand and changing needs, operate flexibly and sustainably, making the most from cross-organisational partnerships. These key components are:

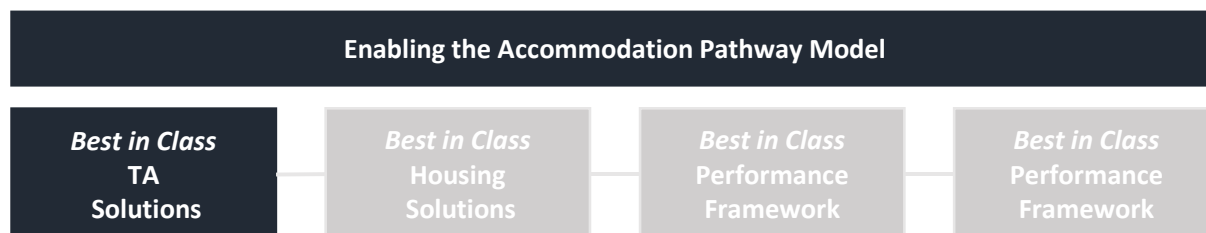
Best in Class TA Solutions: That where a household does reach the point of crisis, the statutory obligations of the councils are met, through accommodation of the right quality, available on sustainable terms to meet changing levels of demand;

Best in Class Housing Solutions: That provides the policy framework and operating model for managing the allocation of social housing stock across both Districts in a fair and efficient way, ensuring the right person finds the right home, and that they are provided a level of support to maximise the chances of them sustaining that tenancy;

Innovative Partnership Solutions: That formalise arrangements between the Councils and their landlords to create a single pool of homes that can be configured and managed flexibly, and nurture broader partnerships across Norfolk (public health, Police and Crime Commissioner for example) that focus on supporting people with specific needs to access and sustain enduring accommodation options;

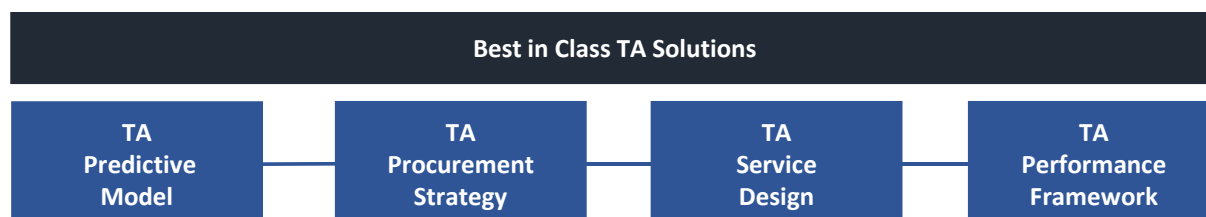
Best in Class Performance Framework: That provides the assurance that the model is fully compliant and that the Councils are correctly discharging their statutory duties, the shape and nature of future demand is being modelled, the performance of the service is optimised and is sustainable, and that the key outcomes of the service are being realised through partnership working.

Best in Class TA Solutions



7.3 As set-out above, the baseline for the combined service is a mixed picture of strengths and weaknesses:

- The introduction of the HRA has not increased the requirement for temporary accommodation, despite a substantial increase in the number of homeless cases presenting to the service, as prevention work has been particularly effective;
- The combined TA portfolio is correctly sized (however the impact of Covid-19 is yet to be fully felt), however the portfolio is not cost effective and needs refocusing;
- Current delivery models and processes are not fit for purpose and need properly resourcing and re-equipping;
- There is no effective modelling of service demands and tracking of outcomes.



7.4 The components of the *Best in Class* TA model are:

TA Predictive Demand Model: That will enable the service to predict the correct level of TA moving forward, based on modelling of current throughput;

TA Procurement Strategy: That will maximise the quality of TA and its match to needs, whilst minimising the cost of provision;

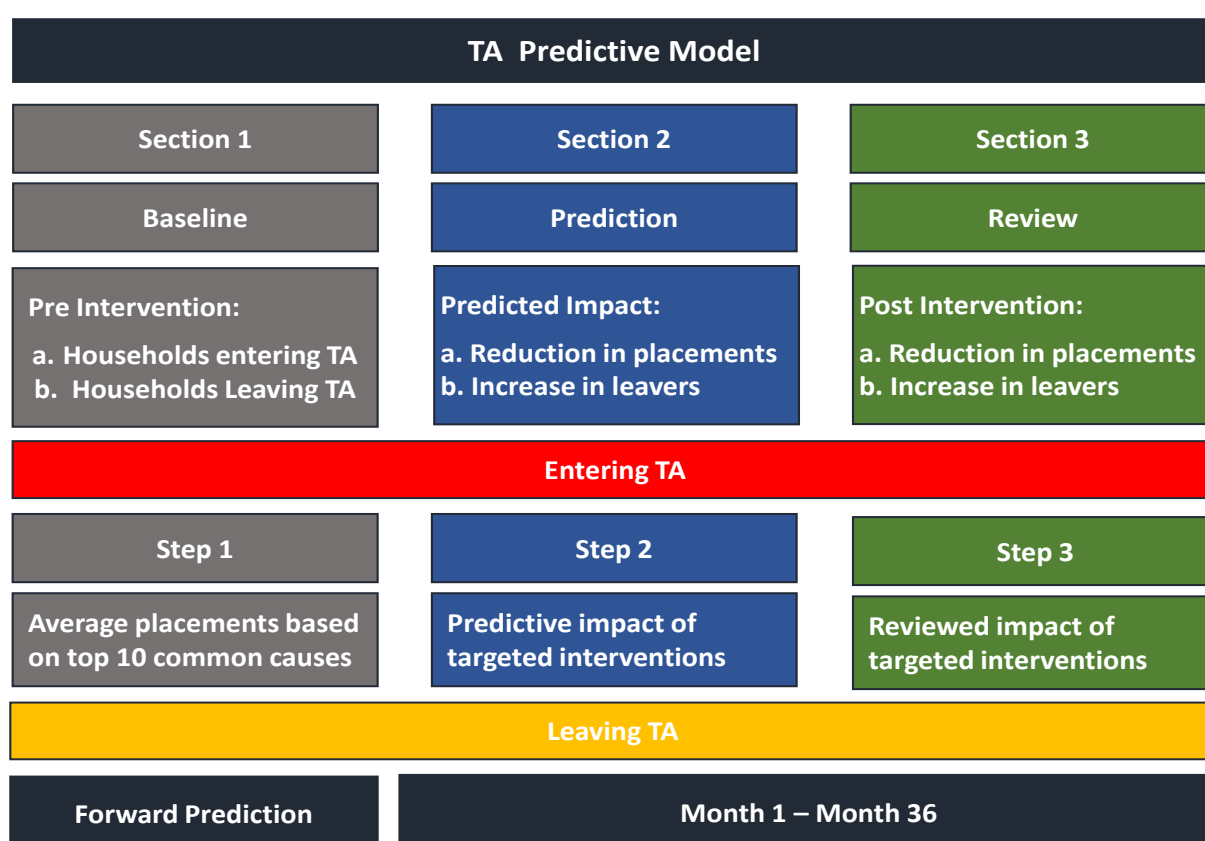
TA Service Design Model: That will restructure the service, the policy framework and operational model, with a focus on risk-based caseworking;

TA Performance Framework: That will use a control and monitoring model to reduce the number of households entering TA and proactively manage their exit to more secure forms of accommodation.

TA Predictive Model

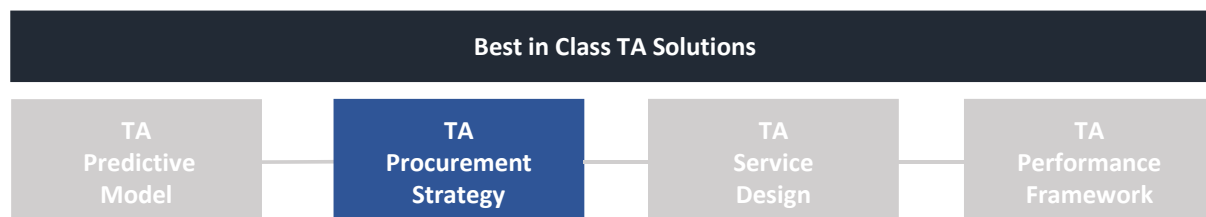


- 7.5 To enable the Broadland and South Norfolk to optimise TA requirements and costs, a *predictive modelling tool* has been developed to calculate the demand for TA over a rolling three-year period, producing a TA *Demand* (into TA) and *Supply* (out of TA) model that will support day-to-day procurement and forecast future temporary accommodation needs.



- 7.6 The model predicts TA demand on a rolling monthly cycle by analysing the potential impact of 14 key interventions that both reduce households entering TA and speed up their exit from it. It models the requirements of the HRA and assists in determining TA procurement needs and in meeting TA reduction targets and realising cost savings.
- 7.7 The model assesses supply and demand indicators in real-time, as well as monitoring performance, which allows for early action to be taken when demand increases or decreases outside of the assumptions made. It predicts with far greater accuracy than at present TA procurement needs and will support more accurate budgetary predictions and intervention when underperforming prevention or supply interventions are identified.

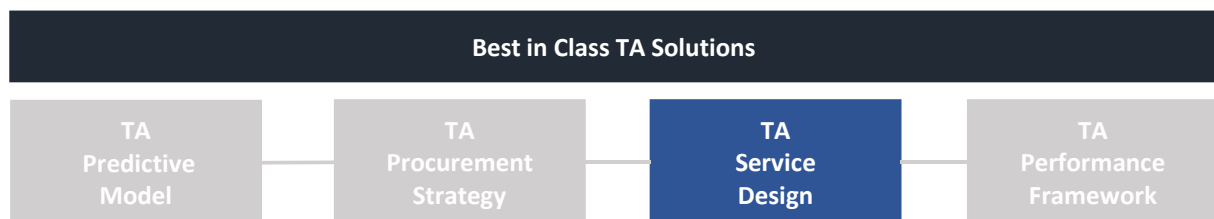
TA Procurement Strategy



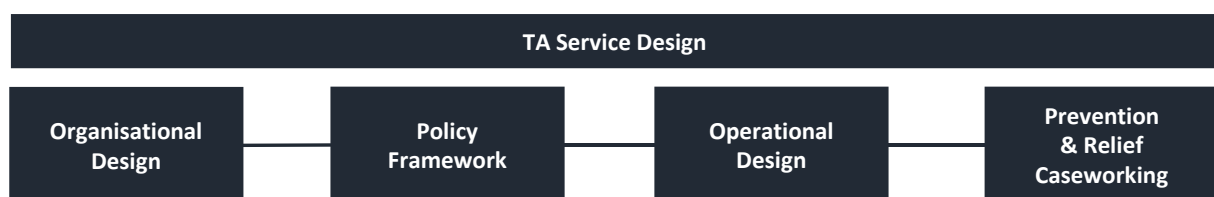
- 7.8 As part of this project a TA procurement Strategy has been drafted based on the baseline analysis, to support Broadland and South Norfolk's procurement decisions in respect of the type of temporary accommodation that would enable the councils to meet their legal duties and to also deliver TA at the lowest possible cost. The full strategy is presented in Appendix 3.
- 7.9 There is a need to make procurement decisions that seeks to minimise the financial costs and reduce financial risk for both Councils. Procurement decisions should be guided by analysing the net cost impact of for each TA type option. This will ensure there is a sufficient portfolio of low cost longer-term TA. The number of units needing to be procured will be guided by the supply and demand model and will need to fully reflect the changes brought about by the HRA in the need for longer-term TA.
- 7.10 There are a number of recommendations concerning the future temporary accommodation procurement model for Broadland and South Norfolk Councils. These are:
- TA procurement decisions should be taken jointly and based on the evidence and recommendations from this temporary accommodation strategy;
 - A mapping exercise is required to inform the TA procurement strategy in respect of the locations where TA needs to be procured;
 - Both Councils the aim should be to develop more units of low/nil cost emergency/short term temporary accommodation to the portfolio by exploring alternative options.
 - Both Councils should explore the option of procuring more short term emergency TA hostel type accommodation through converting multiple use shared accommodation such as low demand sheltered housing or purchasing any former multiple use home. This will provide 'nil net cost' emergency accommodation and will be more relevant to the post HRA legal framework.
 - Neither Broadland nor South Norfolk Councils have a low-cost emergency accommodation option in the form of a local authority owned hostel. This means emergency placements are more likely to be accommodated in bed and breakfast. For single people placed this may have a low net cost whereas for families this will be a far higher net cost. The current profile of the emergency accommodation is almost entirely weighted towards more costly bed and breakfast and nightly let arrangements (see Appendix 4).

- Procurement decisions should include seeking to develop more TA through using social housing stock held by Housing Association partners. This can deliver low cost or no net cost temporary accommodation that can be used for move-on from emergency accommodation or a half-way house between TA and a more settled solution. This option will be especially beneficial to reduce the need to place larger families into high cost Bed and Breakfast or nightly let accommodation.
- Set a target to cut the number of leased properties in half within 12/18 months. The target and exact timescale should be based on an exercise to consider all exiting leases should be completed within 6 months allowing decisions to be made for how many of the existing leases need to be handed back because of the condition of the property, or due to the landlord being unwilling to accept new lease terms. Once this is known the service will be able to plan how many properties need to be leased.
- Given that new procurement decisions will take some time to implement the recommendation is for Broadland Council to continue to maintain a Private Sector Leasing portfolio but not to over commit to this form of accommodation given its potential net cost and risk of further costs for voids if there is not the demand to fill the accommodation.
- Broadland should only renew existing leases, or replace with new units procured, through more beneficial lease terms. This will ensure that lease terms are more favourable to the Council re repairing obligations and rent levels.

TA Service Design



- 7.11 Within the *One Team* operating model, Broadland and South Norfolk have the opportunity to create both a customer focused and sustainable Temporary Accommodation service that will deliver both Councils legal obligations in respect of temporary accommodation.



Organisational Design

- 7.12 It is recommended that a single TA team be established operating from one location. The team must be responsible for the administration of all TA statutory duties, including procurement, placement, process management, charging policy, referral arrangements, checking of standards, receipt and payment of invoices, and the management of benefit payments and rent accounts, in time it could fulfil a broader remit. Specific responsibilities will include:

- Administering placements including performing the critical legal test for assessing suitability, formally offering TA and dealing with refusals and discharge of duty, and administering licences, risk assessments, referrals, housing benefit and rent accounts;
- Commissioning and procurement of temporary accommodation;
- Managing and inspecting TA units;
- Rent collection and managing rent arrears;
- Intensive management and support to tenants.

Policy Framework

A set of legally compliant policies has been drafted as part of this review to reflect the circumstances and meet the needs of both Councils:

- Out of Area Placement Policy;
- Charging Policy;
- Occupation Charge Arrears Policy.

Operational Design

- 7.13 A *TA Operations Manual* has been produced as part of this project to provide a compliant, best-practice based framework to support staff in delivering legal obligations in respect of temporary accommodation, it contains:

Operational procedures: Working processes, guidance notes and forms for the day-to-day management of temporary accommodation;

Occupancy agreements: Used by the Councils for letting temporary accommodation:

- Bed and breakfast or nightly let placements;
- Licence agreement for all forms of interim accommodation leased or owned by the Councils. (for shared facility units and for self-contained units);
- The non-secure tenancy agreement for main duty self-contained accommodation leased or owned by the Councils.

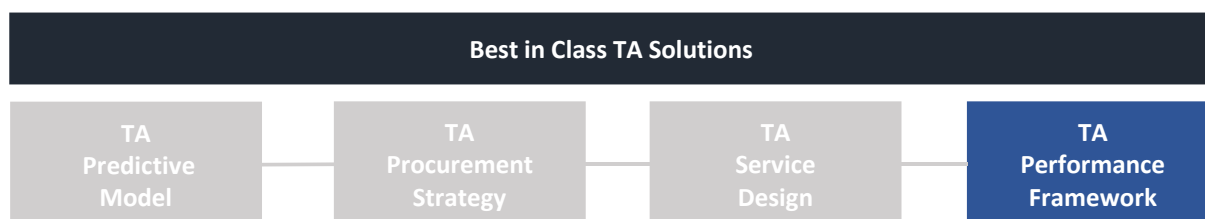
Letter templates: Covering every aspect of licence and tenure management.

Prevention and Relief Caseworking

- 7.14 To support a core deliverable of the *Accommodation Pathway Model* of keeping applicants in the home they have presented from where it is safe to do so, a consistent approach to prevention and relief of homelessness casework is required. A pack of casework resources has been provided as part of this project, which will help the new service to implement the actions required. Specific recommended actions are:

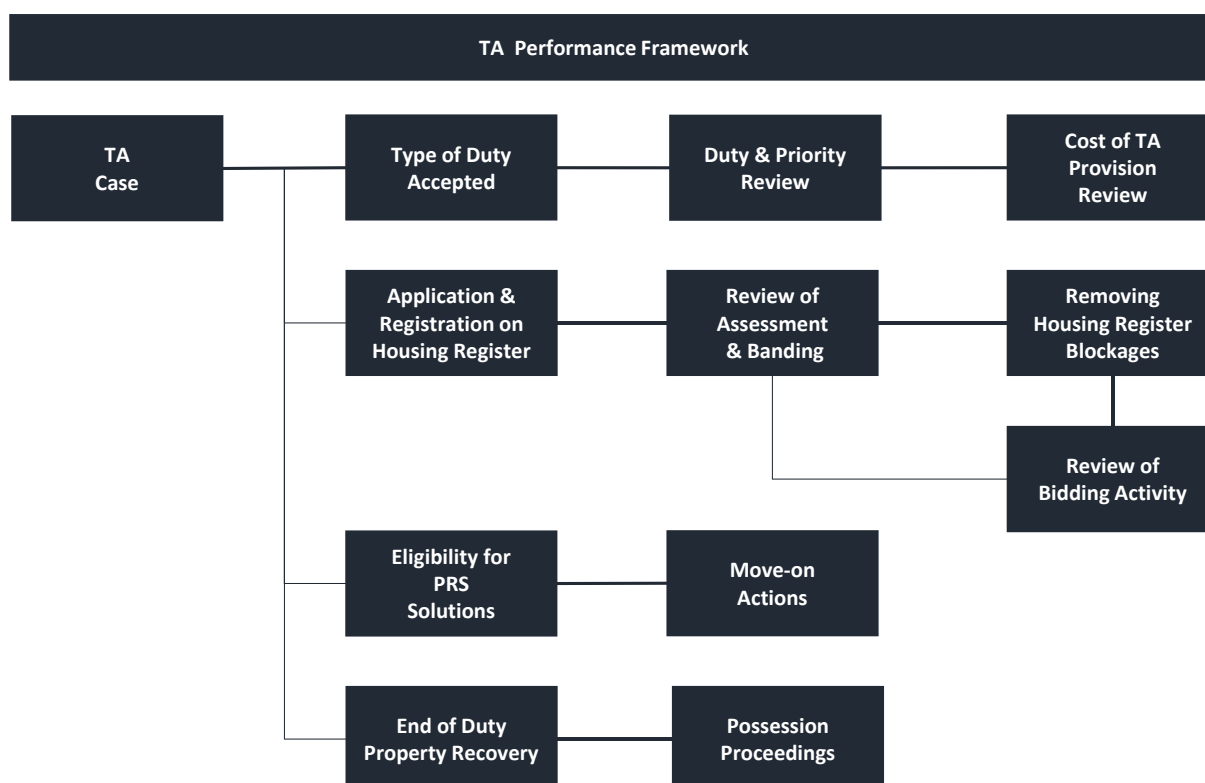
- For each presenting risk of homelessness case, the team will structure their casework around *Prevention Casework Action Sheets* that cover practical casework actions to be taken for each presenting risk of homelessness problem;
- These *Action Sheets* will direct all prevention and relief work to improve the chances of a successful outcome. They will guide officers on the actions to take, and will provide an audit trail to record casework allowing quality assurance that officers are taking the right prevention actions. Caseworkers will use the *Action Sheets* to record their casework notes;
- Caseworkers will be trained and coached ongoing on the new prevention casework processes and interview skills;
- Caseworkers will conduct excluder focused home visits for all family exclusion cases and if not possible, conduct office based structured prevention focused interviews with the parent/person who wishes to exclude the applicant;
- Intervention/solution interviews will be conducted with landlords/managing agents face-to-face rather than just over the phone. This will increase success rates.
- The case officer will make a written 'formal offer to resolve' to any parent, landlord or agent where there is a threat of homelessness.

TA Performance Framework



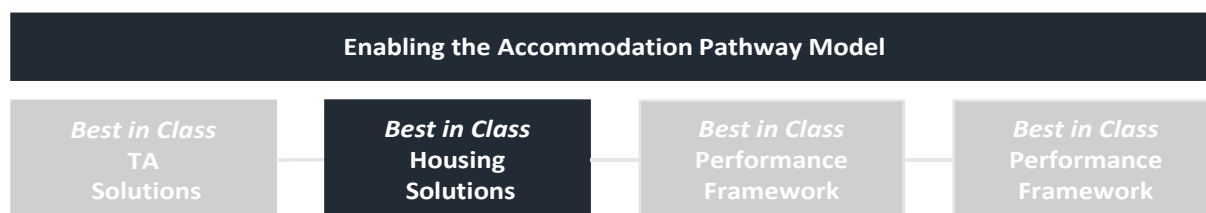
7.15 An effective control process is critical in auditing a customer journey and throughput of all residents in TA, this applies to everyone either owed a Relief or Main Duty, where that duty has been brought to an end, and where action is needed to evict the occupant. It is essential to review and audit cases to ensure that applications are determined quickly and there are no blockages preventing cases from moving on from TA.

7.16 To this end, a *TA Control and Monitoring Sheet* has been developed as part of the project to deliver this objective. It is comprehensive, with every case in TA monitored against a possible 35 case status questions (summarised below). This simple control process will reduce numbers in TA by up to 20%, if reviews result in timely action to resolve the issue identified.



7.17 This is an essential tool for reducing the numbers in temporary accommodation and thereby reducing costs and pressures on the service. It will also allow the Councils to accurately predict how much TA they need going forward. It will ensure that the right people are placed into the right accommodation and only occupy that accommodation for the shortest period of time they need it.

Best in Class Housing Solutions



7.18 The characteristics of a *Best in Class* Housing Solution model is that it:

- Has an allocations policy framework tailored to meeting local housing needs;
- Is customer focused, is easy to access and navigate, and is fair and transparent;
- Has a clear view of demand and the ability to supply meet that demand;
- Builds partnerships with landlords through a Common Housing Register to ensure the successful establishment of a home and long-term sustainment outcomes.

Housing Solutions Model



7.19 The core components of this *Best in Class* Housing Solutions model are:

Allocations Policy: With a common approach adopted by the two Councils that will be flexible enough to meet the sovereign local needs of each council, and to maximise outcomes for both, whilst being complaint and sustainable;

Supply and Demand Model: Published to all delivery partners that predicts demand based on service data, that will inform year-ahead planning and longer-term accommodation build and reconfiguration programmes;

A Structured Customer Journey: That will support self-service registration (*Marketplace*), automated application processing and decision making, self-service housing register management and support efficient and transparent allocation processes that will maximise the choice open to a housing applicant;

Formalised partnership arrangements : With fully integrated Council and landlord processes, which will streamline the lettings and tenancy start-up, providing continuity of support for those who are more vulnerable or less experienced, to enable them to establish and sustain their tenancies.

Allocations Policy



7.20 Broadland and South Norfolk staff and Members are currently drafting a joint Allocations Policy facilitated by CT. key aspects of the policy are described below.

Aims

- 7.21 The aims of the policy must be clear and legally compliant:
- Improve the means by which local people gain access to social rented housing by providing a modern and easy to understand allocation system, which allows choice and is fair, transparent and accountable;
 - Ensure the lettings service embraces equality and diversity by being open and fully accessible to all individuals and to provide support to customers where needed;
 - Meet the legal obligations of the Council by giving appropriate priority to customers who fall within the Housing Act “reasonable preference” categories;
 - Make the best use of the housing stock within the scheme and to increase the availability of move-on accommodation to prevent blockages in supported housing schemes;
 - Reduce the use of housing stock as temporary accommodation for homeless applicants and to assist with prevention by making customers aware of their potential housing choices and the alternative options available to them e.g. private sector, low cost home ownership;
 - Increase opportunities for tenant mobility between the region and other areas of the country. In accordance with the Right to Move statutory guidance on housing allocations for local housing authorities in England (issued by the Department for Communities and Local Government, March 2015) a target of at least 5% of allocations has been set for people moving to a different District for employment purposes;
 - Attract new customers to areas of low demand and reduce void times on ‘hard to let’ properties;
 - Formalise partnership working with landlords within a Common Housing Register (CHR) arrangement, creating an equal partnership between stock holding and non-stock holding partners that will accommodate both landlord and applicant issues.

Qualification

7.22 Criteria for acceptance onto the Housing Register will ensure that local and in some cases people from outside the area in genuine difficulty are supported. Criteria will be based on:

- Homeless Prevention/Relief Duty as defined by the Homelessness Code of Guidance;
- Care leavers owed a duty;
- Supported housing placements in and out of the region;
- Current or former member of the armed forces and civil ex partners of armed forces personnel vacating MOD property;
- Victims of violence/abuse from and outside the region;
- Gypsy/traveller as defined Caravan Sites Act 1968 and habitually resided in region.

Local Connection

7.23 Local connection is defined as being where residency or connection is:

- Resided in the area for 6 out of the last 12 months;
- Previously resident for 3 out of the last 10 years;
- Regular work in the region dependent on residency within the region;
- Existing social tenancy plus ongoing employment or training in the region for the last 6 months and expected to continue beyond 12 months.

Medical Assessment

7.24 A two tier health priority is being promoted. Urgent Health Priority (Band 2) where long term illness and mobility issues are being significantly impacted by the housing and Band 1 emergency health priority where they meet the Urgent Health Priority but cannot live in their home now. Occupational Therapy (OT) assessments will be made through the council's independent OT service. This will enable non-medical professionals to make fair and transparent health assessments.

Allocation by Bedsize

7.25 Allocation by bedsize is determined by People, Children and Property driven circumstances:

People Driven:	Single Person	Couple	Carer	Medical
Policy:	1 bed property or 2 bed above ground	1 bed property or 2 bed above ground	Residency requirement	Provision for extra bedroom
Child Driven:	Child Residency	Unborn Child	16+	Sex Separation
Policy:	4 nights pw + Formal Evidence	MATB1*	Own bedroom	10 Years+

Property Driven:	Under-occupation	Ground Floor or Mobility Needs	* Used by NHS to confirm pregnancy
Policy:	4 nights pw + Formal Evidence	Provide choice and make best use of adapted stock	

Banding and Priority

- 7.27 Banding and priority allocation will be based on housing need, local connection and time waited.
- 7.28 Broadland and South Norfolk have been introduced to three potential banded systems:
- A 5 banded system containing a reduced preference band and cumulative need; this is an adaptation of South Norfolk's existing banded system. Named "Home Options";
 - A 4 banded system without a reduced preference band, no cumulative need and band prioritisation by local connection. Named "Rural";
 - A 4 banded system which is a hybrid of the two, has no cumulative need or a reduced preference band and no band prioritisation by local connection. Named "Hybrid".
- 7.29 An Equality & Communities Impact Assessments has been completed for each district, with the most positive impacts being seen with the 4 banded systems. The Rural banded system demonstrates more positive impacts than the Hybrid. The districts need to make their selection.

Reduced preferences

- 7.30 Where an intervention is needed in the case of unacceptable behaviour (ASB or non-payment of rent for example), the banding of the applicant will not be lowered as is the case now, but they will be prevented from bidding for properties at a lower band, and expected to take responsibility for addressing the problem. This incentivised approach will help enforce good behaviours and foster tenancy sustainment, and in turn supporting positive partnership working.

Allocation Choices

- 7.31 A blended approach will be adopted which will have clear criteria for circumstances where a direct let is appropriate, the bulk of the lettings being undertaken via choice based lettings and lets to the inactive list only where the active list has been exhausted and the household is deemed able to sustain their tenancy.. Reduced preferences will be managed via the Housing Register; households will need to undertake a mandatory period of stabilisation to ensure they acquire the skills to sustain a tenancy, during this time they will be inactive.

Direct lets:

- Homeless and in TA under s189B(2) Relief Duty or Main Duty;

- Urgent rehousing requirement: property, health, personal safety, discharge of homelessness duty, and MARAC where CBL would take too long;
- Emergency rehousing due to flood, fire etc and property requires work/uninhabitable or cannot be done with them in situ;
- Duty to house under s39 land compensation act 1973;
- Where number of offers or refusal already made is deemed unreasonable;
- Adapted units;
- Vulnerable applicants where Choice Based Lettings is deemed inappropriate;
- Sensitive lets;
- Local letting provisions such as s108, rural parish schemes and local lettings policies.

Choice Based Lettings:

- For all other circumstances, but with restrictions for:
 - Number of offers made and unreasonable refusals;
 - Weighting to local need/demand in shortlisting;
 - Restricted advertising around s106m;
 - Homeless applicants where they exceed local demand in the top priority group;
 - Local Partnership Agreements/Local Lettings Plans.

Housing Register Review

7.32 The Housing Registers will be reviewed to an agreed schedule:

- A 4 week review cycle for *Urgent* applications, aligned with the TA performance framework;
- A 12 month review cycle for all other applications.

Supply and Demand Model



7.33 A robust *Supply and Demand Model* is an essential tool in enabling the two Councils to commission and landlords to plan the volume, type, configuration and location that is needed over the short term (year ahead) and the longer term (three to five years):

- The accuracy and usefulness of the model will be dependent on the quality of data output from the Housing Register;
- The model will underpin the creation of *Annual Lettings Plans*. It will provide a baseline for all partners to track demand and needs trends accurately over longer planning horizons and to build, acquire or reconfigure stock holding with a higher level of confidence.



7.34 The elements that form the *Supply and Demand Model* are:

Annual Register Review: The discipline of undertaking an annual review of a well-maintained Housing Register will provide an accurate view of applications within the system and build a picture of demand and needs trends over time;

Annual Lettings Plan: Predicts for any one year the type of accommodation needed, the areas where it is most needed, its configuration and specialist requirement needs;

Informed build programme: Provides a detailed level of analysis to support capital investment decisions as to when and where to build new homes, to cluster and sustain communities;

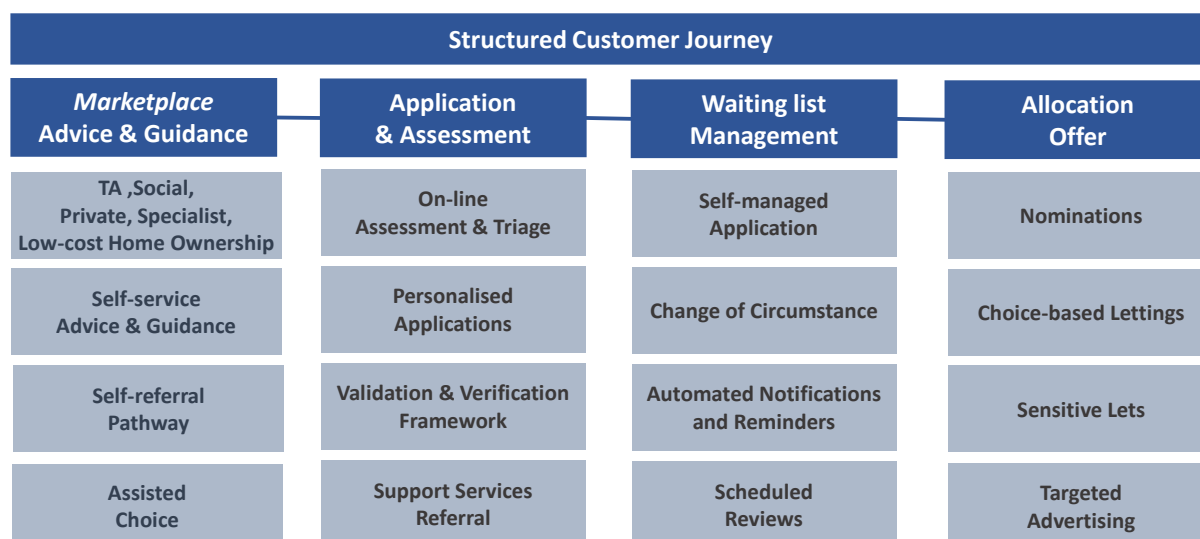
Published model: The *Model* will be published to all service partners to provide a common partnership and understand of strategy direction and working model

Structured Customer Journey



7.35 High quality on-line advice and guidance, self-referral and self-service pathways, with assistance provided, will enable every customer to access an available housing solution:

- Structure high quality advice and support that leads customers towards the applicable self-referral access pathway;
- Identify and provide additional support (Assisted Choice) throughout to those who will find it difficult to navigate the customer journey;
- Support self-service and personalisation throughout the registration, waiting list management and lettings process.



7.36 This key components of the structured customer journey will be:

Marketplace: Advice and Guidance: Enabling customers to explore available housing options and to self-refer for social housing registration, with assisted support available for people who will need help to navigate the process;

Application and Assessment: Combining customer self-service and tailored registration processes with rules-driven process automation to improve accuracy and reduce risk of challenge, whilst triggering support referrals for people in need early in the process;

Housing Register Management: Supporting customer self-service, automated status updates to reduce enquiries, and scheduled reviews to keep the Register current;

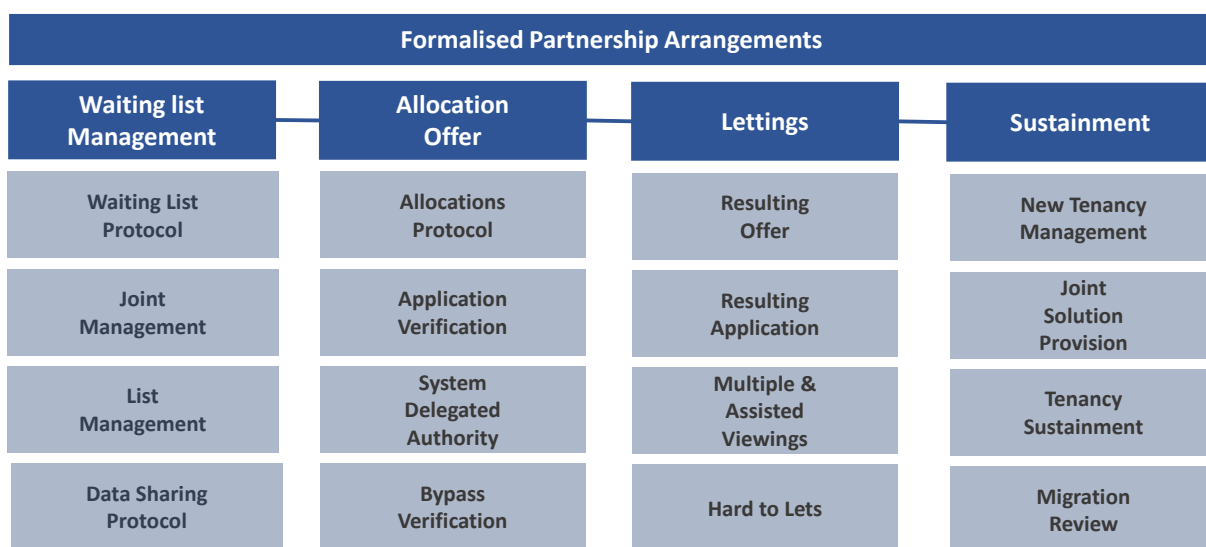
Allocation Offer: Applying the nominations and CBL offer rules fairly and transparently, whilst ensuring ensure that homes are let quickly.

Formalised Partnership Framework



7.37 Formalising the management arrangements between the Councils and partner landlords will elevate what is currently in the main a case-by-case into strategic partnership relationships, they will:

- Ensure the Allocations Policy is correctly and fairly applied, whilst providing flexibility to landlords through Local Lettings Agreements;
- Optimise the lettings process by making it largely self-service via a *Partnership Hub*;
- Turn what is currently largely a hand-off process into a hand-holding relationship that will support more vulnerable customers to establish their new home (particularly younger people), enabling them to build capacity in home management and consequently be less likely to fail in their tenancy and to present as homeless.



7.38 The key elements of the new arrangements will be:

Waiting List Management: Adopting a joint management and deeper data sharing approach that will support a better matching of applicant to potential new home;

Allocation Offer: Enabling landlords to verify applicants quickly and to resolve their own tenancy management issues within the allocations policy;

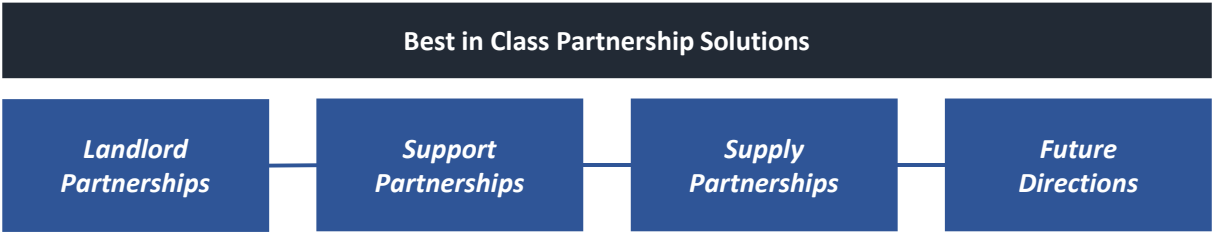
Lettings: Optimising the process to minimise void loss (multiple viewings, hard to lets) whilst ensuring the most vulnerable are supported;

Sustainment: Providing wrap-around support that reduces risk over time and tracks move-on outcomes.

Best in Class Partnership Solutions



7.39 The Covid-19 epidemic has already forced service commissioners and service providers to work together in a very different way, with the usual demarcations and protocols pushed to one side. The legacy of this crisis may be that long discussed goals of wider strategic alignment and integration of service across the public realm may become a reality. The *Accommodation Pathway Model* is an ideal vehicle to help achieve this.



7.40 The elements of a *Best in Class* partnership solutions approach are:

- Landlord partnerships:** Building on the strong transaction-based relationships currently operated to develop strategic partnerships that both release resources and realise new value-added outcomes for all parties, in particular service users and tenants.
- Support partnerships:** Breaking-down the walls between different types of service and service providers, to deliver person-centred services that will reduce dependency over time;
- Supply partnerships:** Using a Social Lettings Agency model to unlock the supply of private sector accommodation into the available housing pool;
- Business development partnerships:** leveraging both the skills developed and investment made in the Pathway model, across Norfolk and beyond.

Landlord Partnership Arrangements



Working within a strategic framework

7.41 Partner landlords work within a range of social housing models and policy frameworks, both locally across Norfolk and nationally, they are keen to work with Broadland and South Norfolk to help shape an integrated housing pathway. Specifically, the features of a new model would from their perspective include:

- Adopting a common Allocations Policy that streamlines approach and process;
- Adopting a Common Housing Register (widely and successfully adopted elsewhere in Norfolk and Suffolk) that delivers a pool of accommodation that meets local needs whilst underpinning and sustaining the operating models of accommodation providers
- Adopting a CBL-based approach but with the added flexibility of direct nominations for certain groups of applicants or for specific types of accommodation;
- Building a holistic view of needs (Council Tax debt threshold) which doesn't penalise those with a chequered history of tenure sustainment or debt;
- Defining a shared approach to risk and to provide the best solution for an individual on a case by case bases, by jointly understanding the real pressures within the system;
- Undertaking affordability checks as standard, particularly for the under 25s, where costs such as heating and transport are critical additional factors in sustaining a tenancy;
- Adopting a flexible approach to homeless applicants who have one chance who then get penalised and or lose position on the housing register;
- Applying flexibility when assessing the local connection of hostel residents who may have originated in other parts of the country and need to escape their areas to prevent reoffending or substance abuse;
- Being attuned to the needs of individuals and to match the accommodation offer more closely (ruralness, support network etc.) to reduce downstream tenancy failure.

Digital by design

7.42 Landlords are confident that the majority of service applicants are perfectly capable of navigating a self-service access pathway and to manage their own applications, however,

more vulnerable residents would require appropriate levels of access support. Specific requirement identified for any new business system are to support:

- Seamless digital processes with shared access to core data and core processes;
- Provision and verification of proofs requested before an application is made live to minimise delay during the offer process;
- Data entry for vulnerable client groups who struggle with providing mandatory information within on-line forms;
- Affordability checks on all applicants and lettings reviews, to stop people bidding inappropriately;
- Landlord checks or references from current or past landlords;
- Provision of sensitive information (beyond contact alerts) to enable landlords to conduct their own interviews;
- Internal tenant transfers and management moves;
- Greater visibility of new build releases and support processes.

Reducing the risk of tenancy failure

7.43 Landlords would welcome a broader partnership-based approach to helping households establish and sustain their tenancies, by sharing and jointly managing risk of failure, by providing wraparound support that enables an individual to build capacity and self-reliance as they move through emergency, short-term and starter lets into secure longer-term accommodation solutions. Building on the frontloaded model of advice and signposting, approaches outlined are to:

- Share financial risk through rent deposit or guarantee schemes, that will enable individuals with a history of debt problems to get restarted;
- Build support packages sensitive to an individual's needs and provide continuity of caseworking support through the letting, start-up and probationary period of a tenancy, building a level of trust with the most vulnerable and hard to communicate with;
- Agree criteria and triggers levels for wider interventions (level of debt, seriousness of ASB etc.) so that support can be provided, within the capacity of the broader system to do so;
- Develop tracking mechanisms that enable individuals to demonstrate skills and capacity building over a period of time;
- Share systems and sensitive information more widely between supporting parties to ensure issues are spotted and tackled quickly;
- Develop a flexible hierarchy of accommodation that support move-on from short-term licences to start tenancies, including the use of *training house* settings.

Support Partnerships



- 7.44 Commissioners of core services at County level such as Adults and Children's services, and other specialist support providers are interested in developing housing-led solutions that are person-centred and that enable an individual to avoid or move away from a point of crisis to one of self-sufficiency. With front-loaded advice services regarded as essential tools to cross-signpost benefits, employment, education, housing, and other support in relation to the nature of an individual's needs.
- 7.45 Opportunities for Jointly commissioning housing-based solutions in which people can receive care (mental health and learning difficulties support for example) need to be explored, as do the development of Joint protocols with social services, mental health units and prisons.
- 7.46 Similarly, there is considerable scope for jointly undertaking strategic planning, share insight and operational data at a much more level than at present, for joining-up capital resources. assets and moving beyond individual organisational budgets to agree whole system funding envelopes.
- 7.47 More broadly there is the potential to unlock a wealth community assets and volunteering initiatives within a collaborative framework accessed through social prescribing (the level of community response to supporting the vulnerable during COVID-19 lockdown has been inspiring and needs to be continued).
- 7.48 Commissioners and service partners identify a wide range of vulnerable groups to whom tailored accommodation and support solutions could be targeted:
- Street homeless with the aim of providing alternatives to a return to sleeping rough;
 - Single people with limited access to core homelessness interventions who are now disproportionately presenting as homeless;
 - People being released from prison and on ex-offender programmes;
 - People living with mental health conditions, with autism or with learning difficulties;
 - Young people, particularly care leavers who lack life-skills and who are not well equipped to sustain a first home;
 - People leaving hospital or acute mental health wards discharged into care settings;
 - Survivors of domestic abuse (large increase in number of presentations during lockdown, in an area with a higher than average incidence);
 - People with no recourse to public funds.

Supply Partnerships



Social lettings Agency

7.50 There is a strong business case for developing a Social Lettings Agency for Broadland and South Norfolk Councils. The aim would be to deliver private rented properties in far larger numbers reducing the need to place households into TA and speeding up move on for households in TA. Two distinct products could be offered by the new service:

'Direct let' tenant finder product: The landlord would not be charged a fee and properties would be accessed through a sensible incentive package which would include a menu of incentives that could be offered on a mix and match basis according to the landlords needs. These could be:

- Rent in advance (Could be a grant, a loan or can depending on tenant circumstances be financed from a Discretionary Housing payment)
- Rent Deposit (Could be a grant, a loan or can depending on tenant circumstances be financed from a Discretionary Housing payment)
- Guaranteed rent (risk assessed)
- Payment of insurance against loss or rent, damage and legal costs
- Small incentive payment to a landlord or letting agent (Councils are still able to make such payments under the Tenant Fees Act 2019 exemptions)

Management service: in addition to the letting service charging landlords between 5% and 8% of the rent as a management fee. This could include a repairs service at cost.

Future Directions



Providing Accommodation Services

- 7.52 There is a clear business opportunity to provide an accommodation finding and management service to meet any statutory duties owed under Children Act, or Adult Social Care legislation. This could be delivered through the expansion of the Social Letting Agency.
- 7.53 For Children's Services this could be:
- Providing accommodation and management services to meet any section 20 duties for 16/17 year olds or finding accommodation to meet any care or leaving care duty and running accommodation projects such as supported lodgings;
 - Placements under section 20 of the Children Act can be upwards of £1000 - £2000 a week and no housing benefit is recoverable on these placements. The procurement of high costs accommodation by Children's Services is often due to the lack of expertise in how to procure more cost effective accommodation;
 - Placements under section 17 of the Children Act can be upwards of £500 a week. These are often placements where a negative homelessness decision has been made and the case referred to Children Services because there are dependent children in a household.
- 7.54 The aim would be to source and procure accommodation placements at a far lower cost to the local authority with the savings offset against the new service's core budget as income.
- 7.55 The same could apply to adult social care placements in small group homes or for individual placements for people with learning difficulties.
- 7.56 The new service would receive a placement fee and the weekly rent with administration costs covered to cover the cost of running these schemes, which would yield cost benefits for . Norfolk County Council in respect of their looked-after costs.

Sharing the model with Norfolk and Suffolk Local Authorities

- 7.57 On-going financial restrictions on local authorities in England will require new approaches to delivering homelessness services and in particular the provision of private rented sector accommodation to prevent homelessness or to meet a temporary accommodation duty or indeed to end that duty with a private sector offer. Services must be more efficient and achieve more with a substantially reduced budget. Inevitably Norfolk wide local authorities will need to look to new ways of delivering their services and reducing any financial risk. The option to 'buy in' a successful private sector accommodation model will reduce the financial

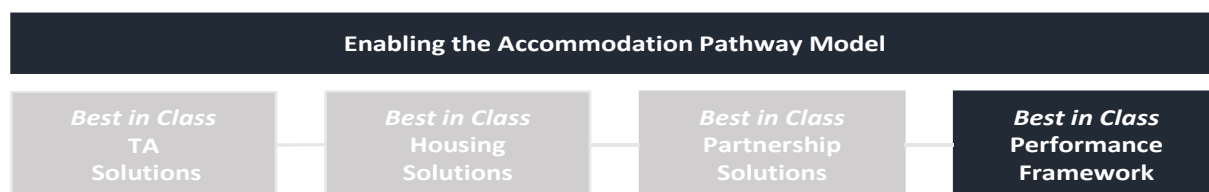
risk of higher homelessness and bed and breakfast costs, as a ready supply of private rented accommodation is the key component for any council to manage the costs of its statutory homeless duties.

- 7.58 Realistically the delivery of the new service model for other local authorities is likely to be only feasible where that authority is geographically close. There may however be an opportunity to franchise the model but this will depend on a number of factors including any intellectual property rights. Regardless of this opportunity, providing consultancy support to local authorities looking to develop a similar combined service will again generate income.
- 7.59 There may also be an income generating opportunity from offering a letting and management service to private sector landlords.

Selling the model to support payment by results payments

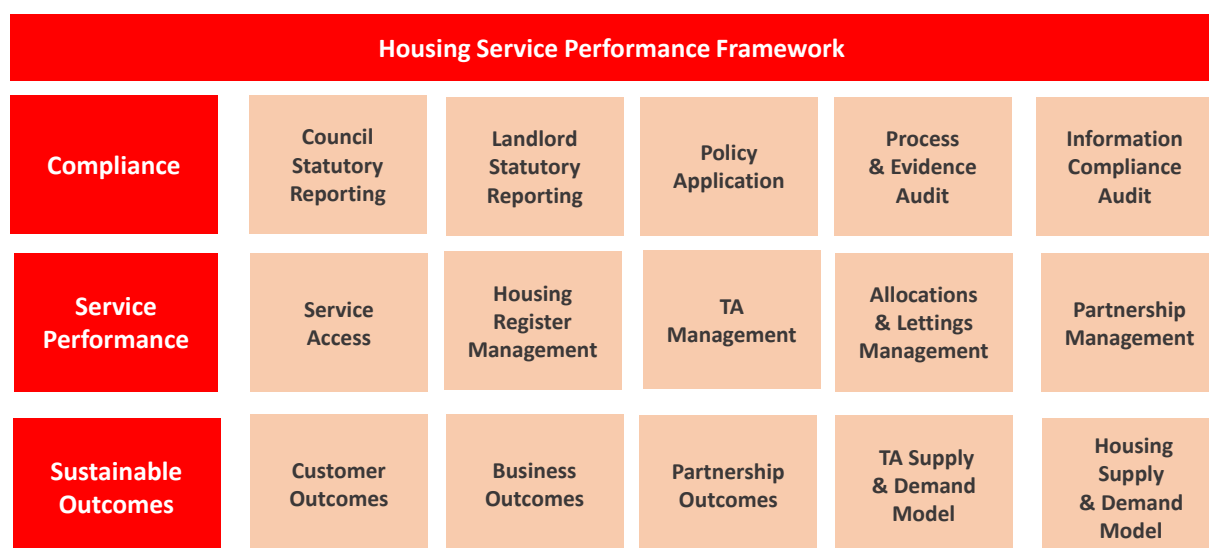
- 7.60 Soundings from MHCLG indicate that they may be intending to base a proportion of future homelessness funding to some extent on the basis of payment by results. Payment by results could conceivably be applied in the future to areas such as an authority's performance in preventing homelessness, eliminating bed and breakfast or reducing temporary accommodation. These all have an implication re higher costs if performance is poor.
- 7.61 A tried and tested model that works could be sold on a consultancy basis or through a partnership arrangement with the aim of ensuring that any Norfolk local authority is able to remain in the top quartile for the performance framework set by MHCLG and is able therefore to maximise any payment by results performance funding.

Best in Class Performance Framework



7.62 A comprehensive *Performance Framework* will ensure compliance, drive-up performance and demonstrate the value of the *Accommodation Pathways Model* in delivering key objectives:

- Customers receive a compliant, high quality service that enables them to resolve their housing needs in a fair and transparent manner;
- Self-service solutions and process automation are reducing demand and increasing efficiency, optimising the supply and cost of short term accommodation solutions;
- Driving wider service outcomes in partnership that are reducing future dependency on core services.



7.63 The *Performance Model* will consist of a suite of performance indicators that measure:

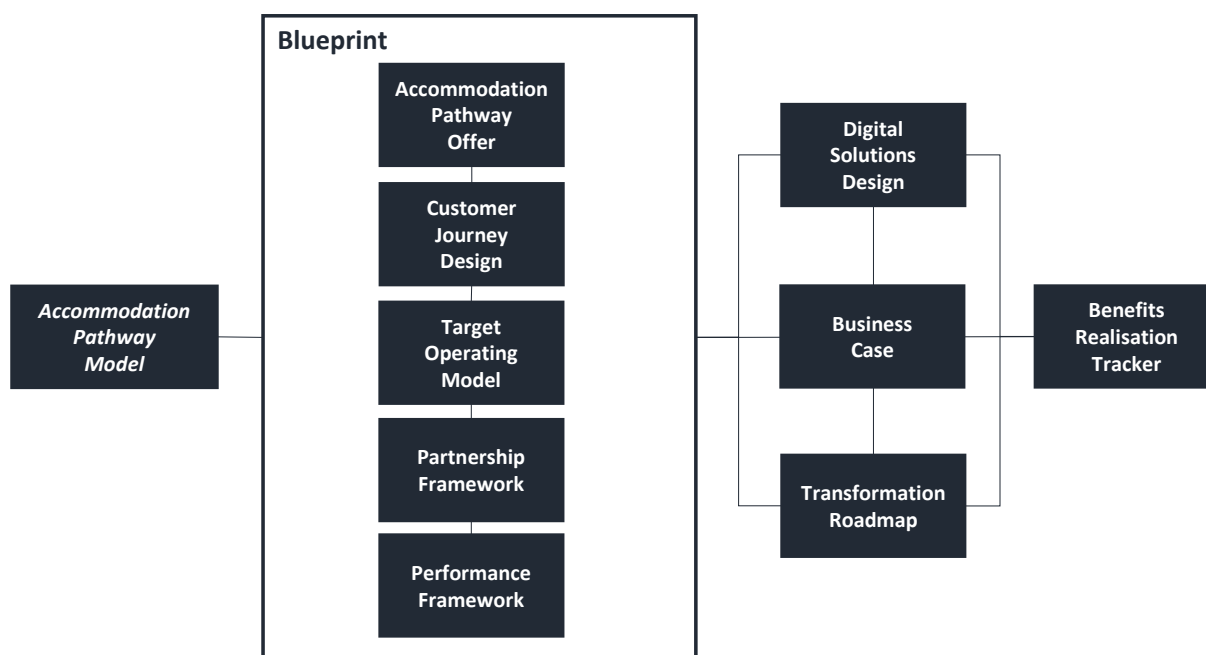
Compliance: The level of assurance that housing services are compliant and meet statutory obligations, are delivered to the terms of core policies, and that full audit trails are in place that will withstand challenge and scrutiny;

Service Performance: The quality of service delivered to customers and level of contentment with their experience, the efficiency of processes, the effective utilisation of resources, and the performance of partner relationships;

Sustainable Outcomes: The impact and value-add the *Accommodation Pathway Model* will deliver to customers lives, in meeting the business objectives of both Councils, landlords and service partners. Also ensuring the long-term sustainability of the model through evidenced-based demand and supply models.

8. DELIVERING THE ACCOMMODATION PATHWAY MODEL

- 8.1 The next step in making the Accommodation Pathway Model a reality is to develop a *Blueprint* that will specify the detail of the *Accommodation Model*. This must be supported by a detailed *Business Case* and *Transformation Roadmap* for delivering the model. A *Benefits Realisation Tracker* will ensure that the model delivers the anticipated outcomes and return on investment made.



- 8.2 A *Blueprint* will work through and resolve the detailed design of the *Pathway Model*:

Accommodation Pathway: Specifying the detailed service offer at each of the four Stages of the Pathway and the enabling *Best in Class* service elements;

Customer Journey Design: Mapping the customer pathways from first access through to sustained accommodation solutions;

Target Operating Model: Specifying detailed the operational and organisational design for aligning the combined with the *Pathway Model*;

Partnership Framework: Setting out the approach for formalising arrangements with landlords and service partners. focused on co-production, balanced risk management and fostering innovative new solutions.

Performance Framework: Defining the insight, supply and demand models, compliance and service KPIs, and customer outcomes that will ensure the model is *Best in Class*.

Digital Solutions Design

- 8.3 The *Accommodation Pathway Model* will require investment in a sophisticated digital business platform that will deliver both customer and delivery partner self-service capability, as well as an integrated digital platform for the service. The platform solution must support:

- The *Marketplace* portal with high quality, interactive content, context driven product registration and personalised applications;
- *Assisted Choice*, enabling people in need of support in accessing the pathway to self-identify and be supported on-line or through other channels;
- Digital workflow and rules-based processes that deliver the Allocations Policy, with caseworking functionality to support an individual over through the entirety of their relationship with the service;
- Portal access for landlords and service partners to complete self-service processes and to share data;

8.4 A set of business requirements for the core system is provided in Appendix 5.

Business Case

8.5 A detailed Business Case will enable stakeholders to assess the merits of the *Accommodation Pathway Model* based on a balanced view of costs set against the benefits and anticipated outcomes, including.

- Project costs including internal and external resources, software procurement and implementation;
- Operational efficiencies, savings and refocussing opportunities, based on implementing a single, flexible operating model and ongoing operating efficiencies delivered through self-service and process digitisation;
- Return on investment (ROI) in over a 3-year period;
- Estimates of potential opportunity costs, income generated and the associated risks of future business development opportunities.

Transformation Roadmap

8.6 Delivering the *Accommodation Pathway Model* represents a *whole system* change, requiring a coordinated transformational change programme, embedded within the business, with the momentum and resources to focus delivery over a 9-12 month timeframe. Specifically:

- A governance structure with Executive sponsorship and buy-in from Members and stakeholders to provide oversight of the delivery, to identify and mitigate risk, and ensure benefits are realised;
- A single prioritised resource plan that will maximise the capacity of the service (and core support services such as ICT) to deliver and embed change on top of a business as usual workload;
- A *Benefits Realisation Tracker* will ensure ensures strategic objectives are realised over the next three years.

9. SUMMARY

Scope

- 9.1 To deliver the goals of *Our Plan* (2020-2024) within the context of the newly formed *One Team* operating model, CT has worked in collaboration with Broadland and South Norfolk staff, Members and stakeholders to define a *Best in Class Housing Offer*. The project scope is to:
- Reduce the demand for TA and expand accommodation options open to households;
 - Create a *One Team* housing service that minimises risk whilst maximising customer support;
 - Develop a sustainable model that reinvests income into support provision;
 - Outline partnership solutions that deliver a ground-breaking housing pathway.
- 9.2 The onset of the Covid-19 pandemic during the early stages of project delivery has delivered a salutary lesson in focusing on what really matters, and has helped set the level of ambition of the project in enabling Broadland and South Norfolk to tackle the aftermath of the crisis with the focus to achieve *Best in Class* at the same time.

Pulling back from the cliff-edge

- 9.3 Local authority housing delivery models are characteristically passive, and delivered at the point of crisis to a relatively small cohort of households. They fail to deliver practical housing help, advice, and solutions for the vast majority of residents that have a housing need, who are filtered-away from receiving support of any kind.
- 9.4 Furthermore, they fail to promote and deliver resilience amongst residents in housing need by expecting them to be proactive, to adapt their behaviour to increase their chances of obtaining a solution.
- 9.5 As a consequence, many residents end-up in housing crisis, resulting in homelessness and an application under statutory homelessness legislation. This situation is compounded by a lack of strategic alignment between Councils and landlords, resulting in a transfer of risk and responsibility for those placed in social housing, which increases the risk of tenancy failure, often resulting in a life-limiting and costly unbroken cycle of homelessness and eviction.

Forming a Service Baseline

- 9.6 Since the enactment of the Homelessness Reduction Act in 2018 , both Broadland and South Norfolk Councils have experienced a 162% increase in homeless applications (142% in the rest of England).
- 9.7 However, both Councils have been particularly successful in preventing homelessness through upstream interventions, which has relieved the pressure on TA provision (51 households housed in TA – April 2020). This has been achieved almost exclusively by placing households in social housing, whilst there are no examples of an individual or household avoiding homelessness by remaining in their current accommodation, whereby avoiding an intensive service intervention altogether. This is not a fair or sustainable strategy.

- 9.8 A significant percentage of individuals approaching the service do so from what had been a stable home or sustainable tenancy, or from a position of relative financial stability, highlighting the need for supporting individuals to plan their own accommodation pathway before a point of crisis is reached.
- 9.9 Whilst the level of insight available from current business systems is limited, it is clear from interviews within the service and with delivery partners that future demand and the need for structured interventions will be increasingly driven by younger people with less well developed life-skills, single person households who have very limited options, people leaving care settings with complex needs (particularly mental health conditions), and older-people requiring accessible housing solutions.
- 9.10 The demand for TA has remained fairly constant, despite the introduction of the HRA (however with the full impact Covid-19 still unclear). The TA portfolio across the Districts is a mixture of council owned and privately let units. The level of PRS provision at Broadland is having a significant negative cost impact, estimated at between £200 and £250k p.a., as the accommodation is more suited to longer term occupation. TA provision in South Norfolk (7 units) is too small and risks reliance on expensive bed and breakfast accommodation.
- 9.11 The introduction of two new prevention and relief duties means that a balance between the need for short term emergency accommodation needs to be struck. Based on the analysis undertaken, Broadland and South Norfolk require additional short-term emergency accommodation and less long-term temporary accommodation moving forward.
- 9.12 There are weaknesses in the way TA is currently managed in both Councils and there is an urgent need to implement a new TA structure from one location to ensure consistency, control and continuity. The combined service needs to be correctly resourced, and to this end a business case to access Government funding from 2021 is presented.
- 9.13 The creation of the new *One Team* operating model provides a unique opportunity to completely overhaul the current model of social housing provision. This must transform the underpinning principles that currently encourage band chasing to evidence *urgent* need, the weaknesses of allocations policies that render them potentially non-compliant, the high level of manual and inefficient business processes, and relationships with landlords many of which have not been reviewed or enhanced since stock transfer. The new model must build upon the strengths of the combining services in identifying needs and providing supporting services through their respective *Support Hubs*.
- 9.14 Service users surveyed were generally happy with service they received from their Council, however the number of re-banding decisions upheld on appeal and level of contact made to chase progress, demonstrates that there is considerable scope to digitise (change of circumstances) , automate and streamline (bidding and lettings) many aspects of the service.
- 9.15 Partner landlords interviewed view the combined service in a positive light and would like to see the adoption of a joint, a blended approach to allocations moving forward that combines both approaches would be welcomed. They would also welcome the establishment of more

formal, partnership-based relationships moving forward, centred on sharing risk and the needs of the individual.

Facing the future

- 9.16 In the post Covid-19 operating environment, a sit back and wait approach is not an option. A demand spike driven by unemployment, tenancy and mortgage default, mental health and domestic violence driven household failures, could result in such financial pressure that the viability of the Councils is at risk.
- 9.17 New thinking is required to meet the legal responsibility to deliver housing advice, to help all residents in housing need to avoid homelessness. Existing service offers based on intervention at the point of crisis and delivery models based on disjointed service elements have been made irrelevant almost overnight. Only a holistic Pathway model can deliver an effective response on a sustainable basis.
- 9.18 Broadland and South Norfolk are at a natural point of reinvention and have the opportunity to be bold and create a *Best in Class* solution based in the Covid-19 world, which provides universal on-line access to support all residents and empower them to resolve their own housing issues. To support households along a supported pathway that keeps them away from or move successfully away from homelessness, with wider accommodation choices based on their circumstance, and to work in partnership with landlords and support providers to help individuals build a level of resilience that reduce future reliance on the system.

The Accommodation Pathway Model

- 9.19 The Accommodation Pathway Model will be a first of its kind in the UK to deliver a holistic housing service to the whole community regardless of their immediate need, with the aim of enabling them to plan for their long-term accommodation needs with a realist set of options, whilst supporting those who reach a point of crisis to re-establish and sustain a suitable home.
- 9.20 The *Accommodation Pathway Model* has four clearly defined and outcomes focused stages:
- 9.21 **Stage 1 - Marketplace:** Will present a single digital access pathway into the housing service for anyone needing help to assess their housing needs and options, with the objective of delivering self-help solutions to the majority of those in housing need. Equally however, it will identify at an early stage, individuals approaching a point of housing crisis, risk factors that may trigger a formal intervention, and residents who may be too vulnerable to support themselves through the process unsupported.
- 9.22 *Marketplace* would provide access all available housing products in one place with the intention that it would become the first place to go for all residents in housing need. Residents would be able to register electronically their housing need and explore accommodation options. A personalised *Accommodation Options Plan*, would outline accommodation options over time, applicable to their personal and financial circumstance

- 9.23 Low-cost, self-service *enabling* packages could include pre-tenancy courses, access to complementary service and community resources, a digital extension of the Support Hub services already in place.
- 9.24 The extent of any *direct intervention role* at this point will need to be examined in terms of how such intervention can directly influence downstream costs and outcomes though out the system, such as providing a rent deposit scheme to help someone secure a tenancy, or a support scheme to help someone avoid eviction.
- 9.25 *Marketplace* will absorb a considerable volume of enquiry-based demand, structure, route and triage formal applications for accommodation and support, and build a picture of demand.
- 9.26 **Stage 2 - Prevention:** Will provide options for people at imminent risk of becoming homeless. However, if the *Marketplace* fulfils its role, households seeking support, should be fewer in number and hopefully already in the system and their circumstances known.
- 9.27 The *enabling* package set out in *Marketplace* would still be relevant, however, given the imminent risk of homelessness, caseworkers would need to be more proactive and directive when working with residents in order to prevent them losing their home, or to support them to find something else before they reached the point of becoming homeless.
- 9.28 Enabling families to remain at home and wait for social housing rather than become homeless is the best outcome for both a household and the two Councils. As part of a new allocations policy framework, homeless households could be incentivised to wait for a social housing outcome and have more choice over where that offer is, rather than becoming homeless and being offered a short-term private rented solution.
- 9.29 Direct interventions could include making financial payments through a *Prevention of Homelessness Fund* or the *Discretionary Housing Payment Fund*, which whilst enabling households to remain in place, has a direct cost and may not change behaviours, whilst brokering solutions to rent arrears between tenants and landlords may do.
- 9.30 **Stage 3 - Stabilisation:** Will provide a tailored package of suitable, high quality temporary accommodation and personalised support to an individual or household with the space to stabilise their situation before taking the next step towards self-reliance. Additional wraparound support will be provided to those who need support beyond finding suitable accommodation.
- 9.31 **Stage 4 - Resolution:** Will enable households to *resolve* their housing need though access to permanent accommodation solutions, regardless of whether they are owed a statutory temporary accommodation duty, by delivering realistic, and suitable accommodation options across all tenures.
- 9.32 Ongoing sustainment and support services will enable a household to set-up and manage a home successfully and to sustain a tenancy, supported by a bespoke *Accommodation Sustainment Plan*. This approach break the cycle of the revolving door of homelessness and of short-lived, broken tenancies by ensuring that solutions are sustainable and long term. On-

going support would be provided through a hub and spoke partnerships and enable access to wraparound services such as health and employment, to deliver joined-up outcomes.

Enabling the Accommodation Pathway Model

- 9.33 To enable the *Accommodation Pathway Model*, the disparate components of the homelessness, TA, and allocations services, their service offers, operating models, business systems and partnership relationships need to be re-thought and re-aligned to create a holistic Best in Class solution envisaged.

Best in Class TA Provision

- 9.34 Moving from the current model for the provision of TA is a necessity if the right type of TA is to be provided to meet demand at a sustainable cost. The target model for the provision of TA is a closed cycle that will ensure statutory requirements are met, whilst optimising quality of product and operational performance through accurate demand forecasting and utilisation modelling.
- 9.35 Broadland and South Norfolk should adopt a joint approach to TA procurement, based on an accurate mapping of need. Reliance on expensive PRS accommodation should be reduced in favour of developing accommodation solutions through RSL partnerships. There also needs to be a shift in the type of accommodation procured from longer-term move-on to shorter-term emergency accommodation.
- 9.36 A dedicated TA management function is required, that is properly resourced and located in one place. The Operations Manual developed as part of this project needs to be embedded, with staff trained in the preventative caseworking methods provided.

Best in Class Housing Service Provision

- 9.37 Similarly, housing service provision needs reframing around a joint Allocations Policy, that will blend the approaches currently adopted by both Councils into a compliant, flexible tool for allocating homes fairly and transparently. A combined CBL and direct offer-based approach will best meet the objectives of both Councils and landlords, in recognising local connection, prioritising the homeless and those most in need, whilst still filling hard to let stock and attracting new customer into areas of low demand.
- 9.38 The customer journey for social housing provision must be standardised, automated and performance managed. There is scope to significantly reduce contact demand through smart self-service registration and application self-management and to embed decision making within the business system to drive consistency and ensure transparency.

Best in Class Partnership Solutions

- 9.39 Formalising the management arrangements between the Councils and partner landlords will elevate what are currently little more than transactional relationships into strategic partnership relationships. Landlords would welcome the formalisation of obsolete service level agreements, to share system and data to join-up end to end processes. They would also

welcome a strategic approach to helping households establish and sustain their tenancies, by jointly sharing and managing risk of failure, through the provision of wraparound support.

- 9.40 The Covid-19 crisis is focusing the minds of all stakeholders across the County. Neighbouring Districts, core service commissioners within the County Council and service providers all recognise the need for opening-up strategic service partnerships that create whole system approach, delivering wider and lasting outcomes at reduced costs and ongoing levels of dependency. This impetus must be harnessed and channelled quickly into ready-to-go solutions such as the *Accommodation Pathway*.
- 9.41 The funding brief of the LGA Housing Advisor Programme has been fulfilled by this project as it has identified significant scope for supporting transformation partnerships that enable services to meet their local housing need.
- 9.42 Broadland and South Norfolk are well placed to become the exemplar *Best in Class* solution provider within the sector. This may in turn open up a range of business development opportunities that could generate income and cover the cost of investment made in the *Model*.

Best in Class Performance Management

- 9.43 A comprehensive *Performance Framework* will ensure compliance of the whole system, drive-up performance and demonstrate the value of the *Accommodation Pathways Model* in delivering key objectives. Specific objectives should be to measure the quality customer experience and outcomes achieved, the impact of self-service and process efficiency in managing demand, and the realisation of wider service outcomes delivered in partnership.

Delivering the Accommodation Pathway Model

- 9.44 The next step in making the *Accommodation Pathway Model* a reality is to develop a *Blueprint* that will set-out the characteristics and components of the *Pathway* and target operating model for the *One Team* housing service.
- 9.45 Underpinning the *Blueprint* must be a robust *Business Case* that sets out the investment needed to deliver the *Pathway*, the operational efficiency savings and tangible customer benefits it will deliver, ensuring its enduring sustainability.
- 9.46 A *Transformation Roadmap* will enable the service to deliver the change programme quickly and efficiently, with effective governance and resource planning, and to ensure strategic goals are realised through ongoing benefits tracking.
- 9.47 Finally, the drive and emerging culture of *One Team* to complete this project at a time of intense operational change and unprecedented service demand, coupled with the shared vision of Members of both Councils, proves that the *Accommodation Pathway Model* can quickly be made a highly successful reality.

APPENDIX 1: STAKEHOLDER CONSULTATION

Landlord Consultation List	
Landlord	Key Contact and Role
Registered Provider	
Clarion Housing	Nina Burton – Available Homes Manager Sally Greetham – Housing Services Manager Sue Stavers CIHCM - Head of Operations (East)
Flagship Housing Group	Michael Tanner – Housing Manager Simon Carr – Housing Manager Jay Furner – Housing Manager
Saffron Housing Trust	Tracey Dowse – Neighbourhood Manager Karen Benton-Warboys – Lettings and Support Manager Andrea Curson – Neighbourhood Manager
Victory Housing	Jackie Finnegan
Supported Housing Provider	
House of Genesis – BDC	Alan Barker

Key Agency Consultation List	
Landlord	Key Contact and Role
Local Authority	
Children Services – Norfolk County Council	Amanda King
Adult Social Care – Norfolk County Council	Rob Cooper – Commissioning Programme Manager Mental Health
North Norfolk District Council	Lisa Grice – Housing Options Manager
Norwich City Council	Chris Hancock, Chris Haystead
Kings Lynn and West Norfolk BC	Ross Hefford – Housing Manager

APPENDIX 2: FUNDING CASE FOR ADDITIONAL TA RESOURCES

Context

- 0.1 Additional TA resources can be delivered through Government grant funding for homelessness which includes funding for delivering the temporary accommodation function.
- 0.2 The funding from the Government is set out in the table below. This does not include the funding that the Council has already committed through its core Council Tax funding of homelessness as a statutory service.

Funding Source	Broadland 2019/2020	Broadland 2020/21	South N 2019/20	South N 2020/21
FHSG	£216,977	£165,094	£48,192	£69,287
NB/HRG	£33,616	£82,962	£41,248	£99,676
RSG Named HPG	£111,000	£111,000	£194,000	£194,000
Total	£361,593	£359,056	£283,440	£362,963

*Terms defined

FHSG = Flexible Homelessness Support Grant (Ring fenced funding for tackling homelessness)

New Burdens/Homelessness Reduction Grant = A grant to support Councils in implementing the Homelessness Reduction Act. Called 'New Burdens' in 2019/20 and renamed Homelessness Reduction Grant from 20102/21

Homelessness Prevention Grant = A named line in the Councils Revenue Support Grant settlement from MHCLG

*Note the MHCLG Grants above exclude grants specifically for tackling rough sleeping

- 0.3 Based on the funding table set out above, MHCLG Government grant funding for tackling homelessness is at approximately the same level for Broadland but has increased by nearly £80,000 for South Norfolk. Across the 2 Councils therefore there is £80,000 of additional funding some of which should be prioritised to set up a dedicated TA team.
- 0.4 In addition by taking the actions set out in section 3 of this strategy regarding future procurement decisions based on best value this should realise net savings across the combined Councils of at least £100k and possibly up to £200k based on reduced levels of bed and breakfast usage and savings to the PSL budget.
- 0.5 A mixture of additional MHCLG grant funding and TA cost savings should be used to fund the increase in resources required to establish the Accommodation/TA Team
- 0.6 It is critical that an evidence base can support the decisions in respect to the type of TA, a balance of short and longer term accommodation, that will be needed to enable both councils to meet their legal duties and to deliver high quality accommodation at the lowest possible cost.

APPENDIX 3: TA PROCUREMENT STRATEGY

Context

- 0.1 It is critical that an evidence base can support the decisions in respect to the type of TA, a balance of short and longer term accommodation, that will be needed to enable both councils to meet their legal duties and to deliver high quality accommodation at the lowest possible cost.
- 0.2 The HRA brought into the legal framework for homelessness two new duties, that an applicant can receive before a local authority is required to assess whether a final 'Temporary Accommodation Main Duty' is owed. The two duties are:
1. A duty on local housing authorities to prevent a household from becoming homelessness by helping any eligible homeless applicant to stay in the accommodation they have presented from, or to help them to move to alternative suitable accommodation before they reach the point where they become physically homeless.
 2. A new duty is placed on local authorities for applicants who are owed the new prevention duty but subsequently become homeless, or who present to the Council at the stage when they are physically homeless. This duty is to take reasonable steps to relieve the applicant's homelessness by helping them to find suitable accommodation.
- 0.3 Importantly these 2 new duties can be ended successfully through a new flexibility in the legislation that recognises that many local authorities have limited social housing resources to be able to provide everyone with a long-term social housing solution.
- 0.4 The new legislative 'flexibility' is that the prevention and relief duties can be brought to an end through any suitable accommodation offered, or secured by the authority or the applicant that has a 'reasonable prospect' of being available for at least 6 months. The current main statutory duty in contrast can only be brought to a successful end through social housing or a 12-month fixed term tenancy.
- 0.5 The flexibility the HRA gives local authorities to tackle homelessness and successfully end the 2 new duties has altered the balance between the numbers of short term and long term TA units that a Council needs to procure.
- 0.6 Fewer units of longer term TA are needed because far fewer applicants progress to a 'final Main duty' as the prevention or relief duties can be ended with any accommodation of a minimum 6 month duration.
- 0.7 The focus for TA and its procurement going forward will be on the need to procure more short-term 'quick turnover' type temporary accommodation to accommodate applicants in priority need owed the relief of homelessness duty whilst they wait in TA for an accommodation solution that can be social housing, but equally can be a private rented offer of a minimum 6 month period.
- 0.8 Councils have a relatively 'long window' of 56 days to procure or arrange that offer of 6 months accommodation. There are important recommendations in this strategy aimed at opening up

the private rented sector to deliver far more private sector lettings to supplement the current level of social housing lettings.

- 0.9 It is anticipated therefore that in the future the vast majority of applicants in Broadland and South Norfolk that are in priority need and are owed a prevention duty because they are threatened with homelessness, or are in TA under a relief duty will be able to be offered an accommodation solution at the prevention duty stage or, if they become homeless, before the end of the 56 day period of the 'relief duty'.
- 0.10 The Homelessness Reduction Act (HRA) has impacted significantly in Broadland and South Norfolk regarding the 'balance' between short-term emergency accommodation need and longer-term TA need. More short-term TA units are required and fewer long-term PSL type units are needed.
- 0.11 Failure to adapt to this changing picture is already having a negative financial impact on Broadland Council in particular, as outlined above.

Evidenced-based procurement

- 0.12 TA procurement decisions must be taken after analyzing the evidence for the geographical areas that account for most homelessness demand.
- 0.13 Broadland District Council covers an area of 211 square miles and consists of 65 parishes. South Norfolk Council covers an area of 350 square feet and consists of 119 Parishes. It is inevitable that it will not be logistically possible to place households into temporary accommodation that is located in the area where an applicant became homeless from given the large geographical spread of both Councils. For practical, administrative and financial reasons temporary accommodation cannot be procured that is easily accessible from any Parish across the two Council geographical areas. Therefore, sufficient temporary accommodation has been procured in the larger areas that have reasonable road and public transport links.
- 0.14 It will not be possible to match every household requiring TA to a property that is physically located in the area they have become homeless from or wish to be temporarily housed. The procurement of TA has had to reflect the reality of the housing market in Broadland and South Norfolk. More TA has been procured in areas with lower rents with access limited in areas where the rented market is targeted at tourism.
- 0.15 However, a new TA procurement strategy must be guided by the locations where households are presenting as homeless from.
- 0.16 A strategic approach is required to ensure that the procurement of new TA whether as emergency or longer-term accommodation is able to provide a suitable geographical spread based on the locations people are presenting as homeless from.
- 0.17 A mapping exercise needs to be undertaken by both Councils and used to inform the procurement strategy. This should involve:

- 0.18 The two Councils analysing for the last 12 months all placements into TA to capture the location they have presented as homeless from and then to match this to the location of the TA portfolio as of 1st April 2020.
- 0.19 It is accepted (and would be likely to be accepted by the Courts in any legal challenge) that the Council cannot match every household requiring TA to the exact parish they have presented from. However, both Councils require a Policy for deciding placements where an applicant may need to be placed some distance away from an area where they may work, have children in school or have family support or other connections. This is the model placement Policy set out in the Operational Manual and legally needs to be adopted by Members for both Councils.
- 0.20 The aim should be to use the information for the locations people are presenting from to help shape the new TA procurement strategy for where procurement should be targeted at in terms of geographical locations

Increasing the TA Portfolio

- 0.21 There are potential options to purchase accommodation to increase the TA portfolio. Some caution should be exercised here.
- 0.22 It is not recommended that the Councils look to develop modular housing units such as 'Snoozebox' or similar low cost modular unit schemes. These are becoming common in areas of high demand such as in London where off the shelf units can be purchased specifically to increase temporary accommodation. However, these schemes are not very cost effective, can be controversial in terms of their visual impact and most importantly the homelessness position in the 2 Councils does not at present justify this option being explored.
- 0.23 However, a case for borrowing can be made to deliver a number of properties that can be used as TA.
- 0.24 This includes the purchase of accommodation that can be used as a hostel or individual ex right to buy properties that could replace the more costly PSL units. Alternatively, the option could be explored to enter into partnerships with Registered Providers to purchase some nits of new build designated for market rent.
- 0.25 However, this option does need a full options appraisal business case and comparison to the costs of alternative TA schemes set out in the costs table above. The business case would need to consider what rent rules could be applied, the cost where applicable of purchasing accommodation if purchased by the Council or a Registered Provider.
- 0.26 This option should be considered in the context of improving the quality, longevity and certainty of the TA portfolio. It would also help the Councils to develop a balanced portfolio of TA. However, there may be a higher cost impact certainly initially compared to other forms of TA.
- 0.27 The Councils therefore need to proceed with caution and undertake a full cost benefit analysis of any options to purchase. The findings should then be fed into the overall temporary accommodation strategy to influence the strategic decisions that are needed regarding the

number, type and cost of the TA portfolio that should be procured to meet the Council's TA needs over the lifetime of this strategy and beyond.

Procuring cost-effective temporary Accommodation

- 0.28 One of the key objectives of this TA Strategy is to guide decisions on the type of TA that should be procured based on the lowest net cost to the Councils.
- 0.29 Some types of TA have a greater financial net cost. This is largely down to the 'rules' set by the Department of Work and Pensions (DWP) regarding the payment of subsidy for any housing benefit paid out a Council for occupants in TA who claim housing benefit.
- 0.30 DWP rules continue to financially penalize Councils that use of bed and breakfast type accommodation and nightly let type accommodation both of which are used on a regular basis by Broadland and South Norfolk. It is therefore important to analyse the financial costs for the type of temporary accommodation currently procured across the Councils, and looks at other forms of accommodation to guide the Councils in making future procurement decisions based on minimising costs.
- 0.31 The Department of Works and Pensions (DWP) sets the funding rules for temporary accommodation through the 'Non-HRA Rent Rebate Subsidy System'. The rules are communicated to local authorities through a series of subsidy circulars. The most recent change by DWP was the decision to keep temporary accommodation within the housing benefit system thereby reversing the intention to pay housing costs for TA through Universal Credit.
- 0.32 However, the change that impacted significantly on Broadland Council was the decision taken by the DWP that from April 1st 2017 no management fee of £60 would be payable for accommodation held under a lease by a local authority. Instead the 'management fee' was to be paid through a new grant called the Flexible Homelessness Support Grant (FHSG). This grant was 'ring fenced' to tackling homelessness and positively provided increased funding and flexibility for Councils to manage homelessness pressures.
- 0.33 However, a negative factor of the new funding system was that from April 2017 private sector leasing schemes (PSL) were no longer 'cost neutral'. Councils such as Broadland who had procured a large leasing portfolio saw a negative financial impact and this cost has increasing in 2019/20.
- 0.34 There is a need going forward to develop new TA initiatives to substitute for the more costly private sector leasing portfolio. This includes new TA schemes and reducing the need for TA through better access to the private rented market.
- 0.35 There is also the potential to combine the FHSG funding for both Councils with other funding such as the Homelessness Reduction Grant, Capital resources such as right to buy receipts and Core General Fund to create a larger commissioning pot to assist in the procurement of accommodation for both TA and enable access to 'move on' accommodation to end the prevention, relief or main homelessness duties.

- 0.36 The table in Appendix 4 sets out the estimated net cost to the Councils of TA. This includes the forms of TA currently used and the forms of TA that could be used. This is based on the current 'rules' as set by the TA funding circular issued by the DWP at the end of March 2017: S5/2017.
- 0.37 The DWP made a decision in 2017 to remove temporary accommodation from Universal Credit from 11 April 2018. Claimants making a new claim to UC and living in temporary accommodation cannot receive their housing costs through UC and would need to claim HB for help with temporary accommodation housing costs whilst still receiving the personal element of UC. This decision was helpful to Councils bringing more certainty to the rules for temporary accommodation subsidy and costs.

TA procurement strategy recommendations

- 0.38 These are the conclusions and recommendations based on the analysis of the evidence, to support Broadland and South Norfolk's procurement decisions in respect of the type of temporary accommodation that would enable the councils to meet their legal duties and to also deliver TA at the lowest possible cost.
- 0.39 There is a need to make procurement decisions that seeks to minimize the financial costs and reduce financial risk for both Councils. Procurement decisions should be guided by analyzing the net cost impact of for each TA type option.
- 0.40 This will ensure there is a sufficient portfolio of low cost longer-term TA. The number of units needing to be procured will be guided by the supply and demand model and will need to fully reflect the changes brought about by the HRA in the need for longer-term TA.
- 0.41 There are a number of recommendations concerning the future temporary accommodation procurement model for Broadland and South Norfolk Councils. These are:
- 0.42 Going forward TA procurement decisions should be taken jointly by both Councils in the spirit of closer working and based on the evidence and recommendations from this temporary accommodation strategy.
- 0.43 Both Councils need to undertake the mapping exercise to inform the TA procurement strategy in respect of the locations where TA needs to be procured.
- 0.44 Both Councils the aim should be to develop more units of low/nil cost emergency/short term temporary accommodation to the portfolio by exploring alternative options. Therefore, both Councils should explore the option of procuring more short term emergency TA hostel type accommodation through converting multiple use shared accommodation such as low demand sheltered housing or purchasing any former multiple use home. This will provide 'nil net cost' emergency accommodation and will be more relevant to the post HRA legal framework.
- 0.45 Neither Broadland nor South Norfolk Councils have a low cost emergency accommodation option in the form of a local authority owned hostel. This means emergency placements are more likely to be accommodated in bed and breakfast. For single people placed this may have a low net cost whereas for families this will be a far higher net cost. The current profile of the emergency accommodation is almost entirely weighted towards more costly bed and breakfast and nightly let arrangements.

- 0.46 Procurement decisions should include seeking to develop more TA through using social housing stock held by Housing Association partners. This can deliver low cost or 'no net cost' temporary accommodation that can be used for move-on from emergency accommodation or a half-way house between TA and a more settled solution. This option will be especially beneficial to reduce the need to place larger families into high cost B and B or nightly let accommodation.
- 0.47 Set a target to cut the number of leased properties in half within 12/18 months. The target and exact timescale should be based on an exercise to consider all exiting leases should be completed within 6 months allowing decisions to be made for how many of the existing leases need to be handed back because of the condition of the property, or due to the landlord being unwilling to accept new lease terms. Once this is known the Council will be able to plan how many properties need to be leased.
- 0.48 Given that new procurement decisions will take some time to implement the recommendation is for Broadland Council to continue to maintain a 'Private Sector Leasing' portfolio but not to over commit to this form of accommodation given its potential net cost and risk of further costs for voids if there is not the demand to fill the accommodation.
- 0.49 In addition, Broadland should only renew existing leases, or replace with new units procured, through more beneficial lease terms. This will ensure that lease terms are more favourable to the Council re repairing obligations and rent levels.
- 0.50 Develop a social letting agency to open up access to the private rented sector in Broadland and South Norfolk.

APPENDIX 4: TA SUBSIDY ANALYSIS

Table 5: Subsidy Analysis		
Type of TA	DWP Subsidy to the Council for any HB paid	Impact on Broadland and South Norfolk Councils
Costs 'Nightly Paid' including Bed and Breakfast accommodation Used by both Broadland and South Norfolk	100% up to 1 bedroom LHA rate of £98.08 and no subsidy payable to the Council above that rate (rate at Jan 2011 for Central Norfolk and Norwich BMRA)	Net loss to Councils per week based on current nightly rates B and B, or non self contained £30 a night = net loss £112(w) £5824 (y) £40 a night = net loss £182(w) £9464 (y) £50 a night = net loss £252 (w) £13,104 (y) £80 a night = (when only non budget hotel available or 2 rooms needed for a family) = net loss 462 (w) £24,024 (y) £100 a night (when 2 rooms needed for a family) = £602(w) £31,304 (y) Large families requiring more than 1 room the loss can be very large, plus risk of a family being impacted by the benefit cap with a further financial impact on the authority).
Pros and Cons 'Nightly Paid' / B and B	For <ul style="list-style-type: none"> ➤ No 'block booking' contractual costs ➤ Only need to use when required ➤ Let on a commercial licence so no responsibility for the authority re removal of residents ➤ Quick turnaround upon vacating ➤ Management provided as part of the costs 	Against <ul style="list-style-type: none"> ➤ Very expensive net costs for anything more than single person placement or 1 plus 1 in 1 room. ➤ Larger families requiring more than 1 room result will result in exceptionally high unit cost ➤ If not self-contained legislation restricts the use for families with children to an emergency, and then for no more than 6 weeks. ➤ Shared facilities for cooking in any non self contained unit provides poor quality accommodation in terms of facilities ➤ Availability not consistent and can be impacted by seasonal variances in Broadland and South Norfolk due to supply issues during the holiday period. This potentially results in higher rates during the summer period especially when spot purchase is required
PSL 'Private Sector Leased' Includes the Broadland PSL portfolio and the properties leased from Clarion plus	The Council receives in subsidy on the HB paid 90% of the LHA rate for the property size (not the family size) but this is based on the lower LHA rate set for January 2011	Issue 1: Net cost of the PSL scheme for Broadland Council <i>Note: The figures below need to be firmed up once there is a clear set of figures for the PSL scheme costs re rent paid to the landlord, HB, HB subsidy, repairs, hand back and management costs</i>

<p>(Tustings) the property leased from the Church in SN</p>		<p>Draft conclusions are: Costs for 2019/20 Rents to landlords: £261,000 Maintenance: £68,000 Hand Back Costs = unknown but can be up to £1000 per property Bad debt costs = Unknown but reported to be high £50,000 est for the scheme? Staffing costs = 1 FTE PSL officer and other staff costs proportioned for PSL work = £50,000 Total estimated cost per year circa = £430,000 Income = £184,000 estimate (includes HB income and working households income) Assumption is that rents are set at the 90% LHA 2011 rates. This needs confirming Loss for the PSL scheme = £246k estimated for the year</p> <p>Issue 2: Further risk going forward The assumption is that PSL rents are at the LHA rates. If in future the Council has to pay market rents this will have a further impact. For example the financial loss to the Council of would be using a 3 Bedroom example for North Broadland and South Norfolk LHA rate 90% of the 2011 rate = 90% of £124 = £111 Average 3 bedroom Market rent rate = £160 Cost to the Council where a lease has to be taken on at the market rent will be £49 a week or an additional £2,548 per year</p> <p>Issue 3: The increasing risk of higher costs through reduced income due to higher void levels due to higher rates of turnover post HRA legislative framework. Voids are increasing in the PSL stock. Example: average of 10 weeks voids per property x 40 properties 10 x £124 x 52 = £64,000 per year Total estimated cost per PSL unit £5780 per year rising to £6780 for year of hand back to the landlord</p>
<p>Private sector leased LA or RP</p>	<p>For</p> <ul style="list-style-type: none"> ➤ Good quality self contained homes ➤ Certainty of length of use under lease 	<p>Against</p> <p>Net cost to the Council of leasing will be higher than many other forms of TA under the post April 2017 TA subsidy rules (albeit the subsidy for the £60 management a week has been paid through the Council's FHSG grant but this funding is likely to have been used elsewhere on homelessness?) Hand back, repairs, bad debt rent arrears and loss of rent through increased void levels result in significant additional costs</p>

		<p><i>Fewer households will require longer term TA with a risk that properties remain void for longer periods with no rental income</i></p> <p><i>For households in PSL owed a 'Main homeless Duty' a court order is required to evict meaning cases can be left in TA for up to 6 months whilst possession action is progressed</i></p>
Local Authority owned properties accounted for in the general fund	Both Broadland and South Norfolk Councils own General Fund TA	<p>100% subsidy can be recovered on HB payable. These properties should be able to be administered at nil net cost to the Councils. Rents can be set to recover the full costs including an amount built into the rent for management and voids and are not restricted by the DWP 'Non HRA rent rebate subsidy system'.</p> <p>A service charge can be levied on top of the rent charged. Eligible service charges for HB can be recovered through HB and 'non eligible' for HB service charges can be charged to the occupant</p>
	<i>For</i> <i>Nil cost temporary accommodation</i>	<i>Against</i> <i>May require capital funding to purchase units</i>

<p>Alternative TA Procurement Cost analysis and pros and cons</p> <p>1) Procure a Hostel (General Fund)</p> <p><i>For and Against points to be considered for the TA Strategy</i></p>	<p>100% of the rent and eligible service charge charged will be eligible for full subsidy with no subsidy limit applied regardless of the family being accommodated in one room</p> <p>Once UC comes in LHA rate will be set by the size of the family occupying the accommodation and not the household size, which will ensure that the Council will continue to be able to recover all of its costs.</p> <p>For</p> <p><i>Maximum flexibility to use accommodation unit or more than one unit as required.</i></p> <p><i>Fast placement and fast 'turnover' and 'turnaround' TA</i></p> <p><i>Very suitable TA for the Homelessness Reduction Act legal framework where short term accommodation is needed whilst 6 months accommodation to end the new prevention or relief duties is sourced</i></p> <p><i>As a hostel no court order is needed to remove the occupant regardless of whether or what homelessness duty is owed.</i></p>	<p>No net loss to the Council as long as all costs are accounted for in the budget used to set the weekly rent and service charge to be levied to the occupant</p> <p>Against</p> <p><i>There are no financial disadvantages of using a Council owned Hostel</i></p> <p><i>Shared facilities for cooking in any non self contained TA provides more limited facilities for occupants</i></p>
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<p>Alternative TA Procurement 2) Registered Provider (Housing Association) own mainstream Housing Stock</p>	<p>For</p> <p><i>Potentially all costs are covered so no net cost to the Council</i></p> <p><i>No restriction on the type of mainstream accommodation that could be used so lower demand older person ex sheltered blocks could be used</i></p> <p><i>The rent plus a service charge can be levied to cover additional management costs</i></p> <p><i>Provides good quality self contained accommodation</i></p> <p><i>Can be used for TA in the long term or short term and supply turned off and on according to demand</i></p> <p><i>No additional cost to the Councils or RP unless the RP charges the Councils for the service or any additional costs but even if this is the case the net cost is likely to be low</i></p>	<p>Against</p> <p><i>It removes some units that otherwise could be used for mainstream social housing</i></p>
<p>Alternative to TA 3) Direct let with a Private Sector Landlord</p>	<p>For</p> <p><i>This would not be TA but an alternative to TA</i></p> <p><i>Would be able to discharge duty therefore reducing need for TA</i></p> <p><i>No lease arrangement so no management, repair, rent collection or hand back costs</i></p> <p><i>The only cost would be the cost of the financial incentive to persuade the landlord to let at LHA rate or close to LHA rate</i></p>	<p>Against</p> <p><i>No negative impacts</i></p>

APPENDIX 5: BUSINESS SYSTEMS REQUIREMENTS

Scope of requirement	
<p>Broadland and South Norfolk District Councils, operating within a joint operating model are seeking to develop and implement innovative new temporary accommodation and allocations pathways, that will enable customers to best address their housing needs, whilst implementing a sustainable operating model that optimises the allocation of assets and resources.</p> <p>To underpin these strategic aims, an integrated business system is required that will fully support interactive digital customer access and self-service, seamless process delivery with a high degree of automation, oversight and compliance, and partnership working:</p> <ul style="list-style-type: none"> • Customer access portal • Housing options management functionality • Temporary accommodation management functionality • Allocations and lettings management functionality • Management oversight, compliance, business and statutory reporting • Accommodation solution partner access portal 	
Key objectives	
Customer focused	<p>Provide a digital marketplace for accommodation solutions that enable customers to take ownership of resolving their housing needs, to be achieved through:</p> <ul style="list-style-type: none"> • The early identification of people facing homelessness and its prevention • An interactive customer portal that draws together advice and guidance, accommodation options and funding solutions into one place • Self-service applications and management with assistance for those who need support • Personalised high-quality advice and guidance on available housing options within the public and private sectors • Sign-posting and routing to employment, health and other support services • Delivering a consistent level of service and a high quality customer experience
Business focused	<p>Develop a joint, compliant, sustainable operating model for meeting housing needs across the Councils, that adds most value for the resources available, to be achieved through:</p>

	<ul style="list-style-type: none"> • A new flexible allocations policy, that best matches accommodation with priority needs and circumstances • Rationalising the temporary accommodation portfolio to deliver best value and best meet needs • Reducing demand through the provision of high quality advice and guidance on-line, on-boarding and self-service, and reducing failure demand through • Significantly reducing the level of staff intervention in straightforward processes • Productivity gains through process automation and the elimination of paperwork
Partnership working	<p>Offer a digital hub through which partners are able to dovetail processes and services:</p> <ul style="list-style-type: none"> • Provide digital support of the Duty to Refer requirement by partner agencies • Enable accommodation and manage the lettings and pre-tenancy process in a seamless way • Enable digital referral and commissioning of support services from external agencies • Track move-on and permanent accommodations outcomes with providers • Ability to support potential future service alignment with other Local Authorities within Norfolk
Housing Options	
Customer access	Portal with self-service password management, providing the customer with a real-time case status, timeline of current actions, their Personalised Housing Plan, supporting records and communications
S213 Referral	Portal access and digital forms (statutory, non-statutory and self-referral) to support partner agencies to meet s213b Duty to Refer requirements
Onboarding	<p>Easily maintained content (including embedded video) will provide the customer with an <i>onboarding</i> style experience which supports a personalised journey through the housing options process, tailored to the need and circumstance information provided:</p> <ul style="list-style-type: none"> • What is my priority?

	<ul style="list-style-type: none"> • What are <i>my</i> specific options? • How do I apply and what do I have to provide? • What is the timeline? • Am I entitled to supporting funds? • What happens next?
On-line assessment and triage	<p>An intuitive digital questionnaire will enable the customer to describe their needs and circumstances, upload supporting evidence and proofs, and where routed by the process, complete a more detailed medical questionnaire</p> <p>Dependent on the whether the customer reaches the <i>risk of homeless</i> threshold, they will be either routed to a personalised set of advice outcomes and referral options will be provided, otherwise a detail assessment appointment will be triggered</p>
Detailed assessment by officer	<p>Complaint, rules-based workflow will guide the officer through the assessment and ensure they consistently apply statutory requirements correctly to each customer, based upon:</p> <ul style="list-style-type: none"> • Circumstances • Accommodation • Needs • Support <p>A Personalised Housing Plan will be automatically created to capture the outcomes of the assessment, agreed actions for the customer, the service and any support service provider, becoming a real-time, jointly-managed case file and enduring history.</p>
Challenge of decisions	<p>Provide a clear audit trail of actions and decisions made to demonstrate fairness and application of policy, in response to challenges of decisions, appeals, Freedom of Information and Subject Access Requests</p>
Third party support services	<p>Enable housing related support service providers to access assigned support tasks through a portal, to report progress and completion of tasks and outcomes</p>
Temporary Accommodation	
TA portfolio management	<p>Maintain a portfolio of temporary accommodation and property data:</p> <ul style="list-style-type: none"> • Ownership, contracts and letting arrangements • Asset details, compliance certification

	<ul style="list-style-type: none"> • Size, inventory and letting suitability • Local amenities and facilities • Placement history <p>Support ongoing portfolio review to ensure sustainable investment decisions are made based on operating cost, charge and utilisation data</p>
TA rent accounting and arrears management	<p>Provide comprehensive rent account management functionality:</p> <ul style="list-style-type: none"> • Reflect payments made through HB, UC or directly by customers • Make rent statements available to customers • Automated suggested actions list production, escalation processes, standard letter and Notice production
Housing Register	
Allocations policy	<p>Manage the Register in accordance with the allocations policy, with the flexibility to meet local needs:</p> <ul style="list-style-type: none"> • Flexible banding and pointing • Local connection • Hard to let properties
Customer Access	<p>Portal (as per housing options) with self-service password management, providing the customer with a real-time application status, timeline of current actions, their application and supporting records, communications and contacts</p>
Change of circumstance	<p>Enable customers to manage their application and reflect change of circumstances such as household composition or needs</p>
Application processing	<p>Support automated banding and points award to create prioritised lists</p>
Challenge of decisions	<p>Provide a clear audit trail of actions and decisions made to demonstrate fairness and application of policy, in response to challenges of decisions, appeals, Freedom of Information and Subject Access Requests</p>
Renewal	<p>Trigger a periodic review process (annual), with an automated communication inviting customers to renew their application and to schedule follow-up actions for officer attention</p>
Allocations and Lettings	

Accommodation marketplace	Provide a highly automated and integrated solution that can facilitate the marketing of tenure-neutral accommodation by partner landlords, providing a high-quality customer experience, that empowers applicants, ensures the best match with the accommodation offer and reduces the rate of refusal
Approach to lettings	Support multiple letting processes and scenarios: <ul style="list-style-type: none"> • Choice Based Lettings • Nominations and direct lets • Temporary accommodation • Management transfers • Supported housing • Private sector letting
Partner integration	Portal access to accommodation providers for the marketing of properties, a seamless lettings process and feedback on the establishment of the tenancy
CBL	Support a high quality digital lettings process that effectively markets each property to reduce refusals and void loss: <ul style="list-style-type: none"> • Property characteristics (360 video) • Scheduled works and a realistic move-in data • Local facilities and amenities • Key tenancy terms and conditions Track and manage the process in accordance with the allocations policy – bids per cycle, non-bids, refusals etc.
Shortlisting	Automated production, provision and maintenance of shortlists
Proxy-bidding	Support proxy bidding to assist vulnerable customers
Pre-tenancy checks	Support providers in undertaking pre-tenancy checks and ensuring tenancies are not set-up to fail
Outcomes tracking	Report on accommodation letting, move-on, commissioning and support provision outcomes
Cross-cutting requirements	
Customer relationship management	Integrated customer relationship management system that provides a holistic view of the customer: <ul style="list-style-type: none"> • Fully digital customer record and supporting documentation • Customer Journal of activities and contacts

	<ul style="list-style-type: none"> • Customer communications preferences • Customer needs and vulnerability flags
Communications management	<p>Manage communications with customers across multiple channels:</p> <ul style="list-style-type: none"> • Generate standard communications • Generate bulk communications (emails, SMS, letters) • Generate customer satisfaction surveys
Workflow and case Management	<p>Business configurable workflow and case management that optimises and automates business processes wherever possible:</p> <ul style="list-style-type: none"> • Applications processing • Decision making and appeals
Management oversight	<p>Customisable dashboard that enables real-time oversight of:</p> <ul style="list-style-type: none"> • Case and task status tracking • Decision reviews and audit • Resource and workload allocation • Key performance indicators
Business reporting	<p>Customisable reports and data exports that allow the tracking of:</p> <ul style="list-style-type: none"> • Service access and referral demand • Caseload performance management • Outcomes and value-add • Customer experience and contentment • Partner performance
Statutory reporting	Automated provision of H-CLIC reporting
Non-functional requirements	
Solution provision	Solution to be provided on a Software as a Service (SaaS) basis
Access	Fully browser-based, mobile responsive and available to staff and delivery partners from anywhere, and WC3A (WCAG 2.1) compliant
Hosting	Secure cloud hosting options (G-Cloud) with demonstrably high levels of availability and resilience

Licensing	licensing model flex to reflect business needs, help realise efficiency savings and support any future cross-Authority partnerships
Delivery and operating charges	Transparent pricing structures for software and implementation services, annual maintenance fees, periodic upgrades, support and consultancy services
Support	Help Desk facility available during office hours with access to appropriate levels of specialist expertise
Compliance	The solution must be capable of underpinning GDS and GDPR compliance
Integration	Standardised API integrations available for core business applications supporting benefits management and finance
Data conversion	Templated approach for loading data from legacy applications

APPENDIX 6: GLOSSARY OF TERMS

There are a number of abbreviations used in this report. These are:

HRA – Homelessness Reduction Act 2017

MHCLG – Ministry for Housing, Communities and Local Government

DWP – Department for Work and Pensions

FHSG – Flexible Homelessness Support Grant

PSL – Private Sector Leasing

PRS – Private Rented Sector

UC – Universal Credit

HCLIC – The Government's MHCLGs homelessness statistical reporting system There is a need to develop an innovative accommodation pathway that not only meets the combined council's TA statutory needs but also delivers substantially more accommodation options.

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**South Norfolk Council
Allocations Scheme**

With effect from ***[insert final Council date]***

Document Control		
Document reference	<i>[Insert Corporate Reference Number]</i>	
Document title	South Norfolk Council Allocations Scheme	
Document status	Draft 2 [28 July 2020] – Major Change	
Document approval route	Internal Management	27 July 2020
	Major changes only beyond this point	
	CMLT	29 September 2020
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Effective from (Date)	<i>[Approval Date – (later one)] or [Next Review Date]</i>	
Policy Author	Campbell Tickell Ltd	
Policy Owner	Housing and Wellbeing Senior Manager	
Consultation: internal	Housing and Wellbeing Service People and Communities Directorate	
Consultation: external	Key Stakeholders <ul style="list-style-type: none"> • Members • Partner Landlords • Partner Agencies • Housing Register Applicants 	
Equalities and Communities Impact Assessment (EqCIAs)	Date completed	In progress
	Partial/ Full EqCIAs	In progress
Data Protection Impact Assessment (DPIA)	Date completed	Recommended - see client brief
	DPIA	
Review	Date due	Annual while you transform
	Reason	
	Review Date due	
	Reason	

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1.1 The Allocation Scheme

South Norfolk Council operates a Housing Register known as the Allocations Scheme.

This document outlines how affordable housing, which is a limited resource in both districts, is allocated to those who need it. South Norfolk Council does not have properties of its own. We work in close partnership with a number of social housing landlords who we refer to as our partner landlords. The partner landlords own and manage properties in both districts. South Norfolk Council will be seeking to formally review its partnership arrangements. It is anticipated that a Common Housing Register approach will be considered the way forward in order to embrace the Allocations Pathway Model. **See Part 2**

We work with:

- Broadland Housing Group
- Clarion Housing Group
- Cotman Housing Association with Places for People
- Flagship Housing Group
- Hastoe Housing Association
- Havebury Housing Partnership
- Metropolitan Housing Trust
- Orbit Housing Association
- Orwell Housing Association
- Saffron Housing Trust (South Norfolk Council's Stock Transfer partner)
- Sage Housing
- Sanctuary Housing
- Victory Housing

We also work with a range of supported and specialist housing providers:

- House of Genesis
- Benjamin Foundation
- Emmaus
- Homegroup
- Solo Housing
- YMCA
- Leeway
- Evolve East Anglia
- St Martins Housing
- Stonham

1.2 The Legal Framework

The Allocation Scheme is a requirement of Part 6 of the Housing Act 1996. Applicants are able to apply for housing and all applications will be fully assessed. The Allocations Scheme has been framed in accordance with the Greater Norwich Homelessness Strategy and the South Norfolk and Broadland Rough Sleeping Statement and the Council's Housing and Tenancy Strategies. It has also been styled in accordance with the LGA funded work to develop an Accommodation Pathway Model with Broadland District Council **see 2.2**. In developing the Scheme; the Council has followed and fully considered the following housing legislation, regulations, and statutory guidance:

- The Housing Act 1996, Part 6 as amended by Localism Act 2011 (England)

- The Housing Act 1996, Part 7 as amended by the Homelessness Reduction Act 2017
- Allocation of Accommodation: Guidance for Local housing Authorities in England (2012, DCLG) “the Code”
- Providing social housing for local people: Statutory guidance on social housing allocations for local authorities in England (DCLG, December 2013) “Supplementary Code”
- Allocation of Housing (Procedure) Regulations 1997, SI 1997/483
- Allocation of Housing (England) Regulations 2002, SI 2002/3264
- Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294 and all subsequent amendments
- Allocation of Housing (Qualification Criteria for Armed Forces) (England) Regulations 2012, SI 2012/1869
- Housing Act 1996 (Additional Preference for Armed Forces) (England) Regulations 2012, SI 2012/2989
- The Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015
- ‘The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) (EU Exit) Regulations 2019 (SI 2019/861)’
- Equality Act 2010.
- Data Protection Act 2018 and contained within the General Data Protection Regulation 2018 (GDPR).
- Care Act 2014
- Human Rights Act 1998

1.3 Right to Move

In accordance with the Right to Move statutory guidance on housing allocations for local housing authorities in England (Department for Communities and Local Government, March 2015) the Scheme sets a limit of no more than 2% of lettings per annum will be allocated to social housing tenants from outside of Broadland who need to move for employment purposes.

1.4 Allocation of a Tenancy

The allocation of housing by a housing authority is defined in s.159 of the 1996 Housing Act as:

- a) Selecting a person to be a secure or introductory tenant of housing accommodation held by them (i.e. by that housing authority)
- b) Nominating a person to be a secure or introductory tenant of housing accommodation held by another person (i.e. another housing authority)
- c) Nominating a person to be an assured tenant of housing accommodation held by a Private Registered Provider (Housing Association)

Lettings outside of the Allocation Schemes are those essentially where the allocation is for a tenant by their own partner landlord. These are summarised in **Appendix 1: Lettings outside of the Allocation Scheme.**

1.5 Data Protection

South Norfolk Council will ensure personal information of all applicants (new, existing and deleted) is:

- Stored lawfully
- Processed in a fair and transparent manner
- Collected for specific, explicit and legitimate for the purpose

- The data will be kept up to date and not held only until it is no longer required.
- Shared only with other organisations for legitimate processing, the prevention of fraud or with the person's explicit consent.

An applicant's permission to share their personal information is a qualification condition of being accepted onto the housing register. The Council has a Privacy Notice which can be located at: [URL to be supplied](#)

1.6 Equalities, Access and Monitoring

South Norfolk Council is committed to ensuring that the Scheme is non-discriminatory and that all applicants are able to access the service, especially taking account of any vulnerability or other specific needs, and also the needs of different groups protected by the Equality Act 2010; the Human Rights Act 1998; and for Children, Section 11 of the Children Act. To identify the needs of our applicants the application contains specific questions relating to vulnerability, ethnic origin, sexual orientation, disability and other relevant criteria. The information obtained will be used to monitor the impact of the policy on minority and specific needs groups and to evidence the need for amendments, as may be required.

Under the Equality Act 2010 and in particular section 149 of the Public Sector Equality Duty, Councils are required to give due regard to eliminate discrimination, advance equality of opportunity and foster good relations between those who share a protected characteristic and those who do not, when exercising a public function such as their legal Housing Allocation Policy. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The new policy has been subject to a full, detailed Equalities and Communities Impact Assessment (EqCIA) before it has been adopted. The impact will continue to be monitored throughout the administration of the Scheme. Should evidence of discrimination occur; it will trigger a "Change to the Allocation Scheme".

1.7 Force Majeure

The Council will not be liable for any delay in performing its obligations under this policy if the delay is caused by a Force Majeure (chance occurrence or unavoidable accident for example), provided that reasonable action and notification to customers is taken by the Council. More fully, this means, circumstances beyond reasonable control of that party, including without limitation, strikes, lock outs, acts of God, the act or omission of any governmental or other competent authority, war or national emergency.

1.8 Changes to the Allocations Scheme

The Council reserves the right to expand, change or alter any element of the scheme, as and when required, to meet changes in housing need, capacity, resources and legislation. The routes to enable the amendments would depend on whether the change is major or minor. The EqCIA will define whether the changes and their impact constitute a major or minor change.

Major	Minor
I. Internal management	Internal management only

- II. Stakeholders including partner landlords and members
- III. Corporate Management Leadership Team (CMTL)
- IV. Legal Check
- V. BDC Wellbeing Panel
- VI. Overview and Scrutiny
- VII. BDC Cabinet
- VIII. BDC Council

The Council will ensure the changed scheme is then made available to the public through its website at [URL to be supplied](#)

1.9 Statement on Choice

This Allocations Scheme is fully committed to enabling customers to play an active role in choosing where, and in what property type and tenure they live, while continuing to house those people in the greatest housing need and complying with all relevant legislation. However, to minimise the risk of further incidents of anti-social behaviour an applicant may be restricted in their choice of area.

It is important to realise that the demand for accommodation is higher in some areas than others. In making a decision about the choices available, applicants need to consider their housing need priority against the availability of properties in any given area.

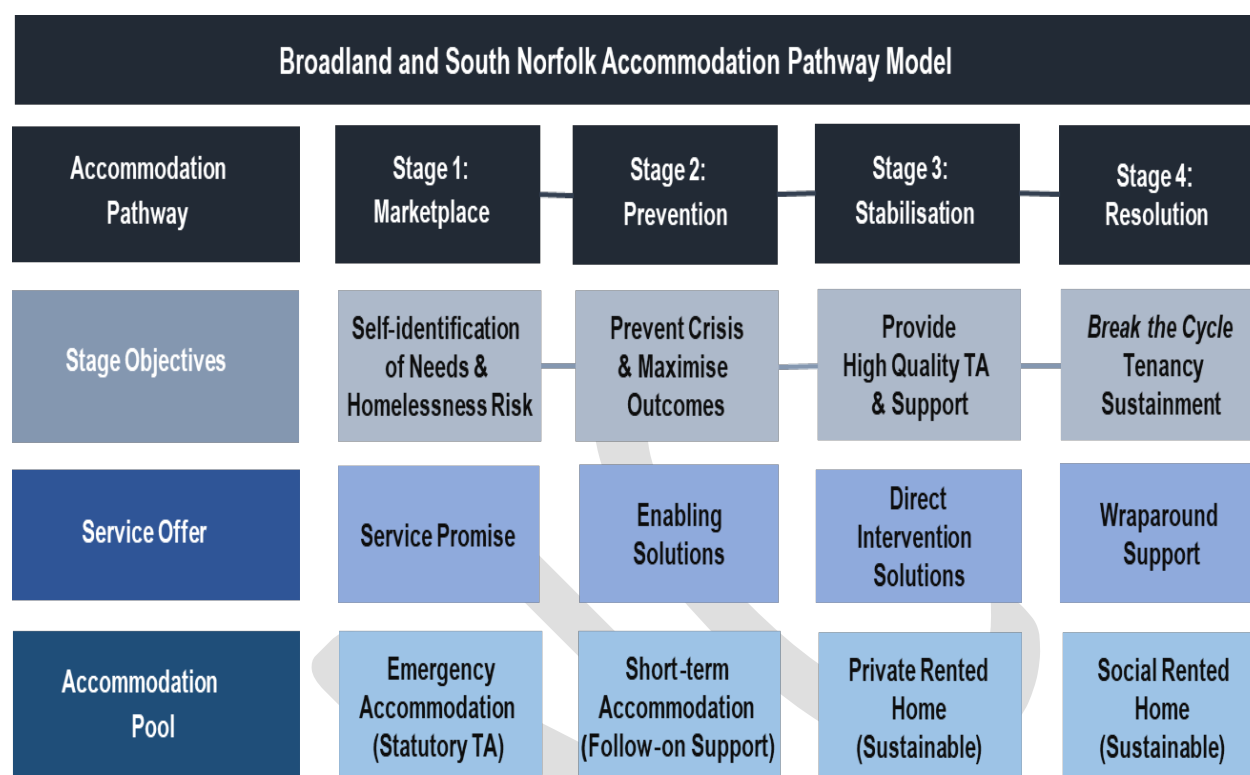
In order to meet our statutory duties, an applicant in the emergency band may be made a direct let of suitable accommodation anywhere within the district.

2.1 Aims of the Allocation Scheme

In order to deliver this Allocations Scheme, South Norfolk Council aims to:

- To reduce the use of temporary accommodation for homeless applicants and to assist with prevention by making customers aware of their potential housing choices and the alternative options available to them e.g. private sector, low cost home ownership.
- To increase the availability of move-on accommodation to prevent 'blockages' in supported housing schemes. Careful consideration will be given to cases referred by other authorities to ensure they fall in line with the intentions under the Right to Move legislation. Also, that it takes into account households who have been placed in Broadland in short term housing projects, but where the longer-term responsibility lies with the referring authority.
- To ensure a lettings service that embraces equality and diversity by being open and fully accessible to all individuals and to provide support to customers where needed.
- To improve the means by which local people in the region gain access to social rented housing by providing a modern and easy to understand allocation system which allows choice and is fair, transparent and accountable.
- To encourage residents to access employment and to recognise residents who make a contribution to a local community.
- To make the best use of the housing stock within the scheme.
- To increase opportunities for tenant mobility between the region and other areas of the country. In accordance with the Right to Move statutory guidance on housing allocations for local housing authorities in England (issued by the Department for Communities and Local Government, March 2015) the Scheme sets a limit of no more than 2% of lettings will be allocated to social housing tenants from outside of Broadland who need to move for employment purposes.
- To attract new customers from the existing housing register to areas of low demand and reduce void times on 'hard to let' properties
- To meet the legal obligations of the Council by giving appropriate priority to customers who fall within the Housing Act "reasonable preference" categories.
- To contribute to the creation of balanced and sustainable communities; ensuring local need is given sufficient weighting.

2.2 Accommodation Pathway Model



The model relies on investment of resources at the front end of our service by looking at how we work with households when they first approach the Council.

Marketplace

This would involve:

- A self-service portal for exploring options available to the household
- Providing it is relatively inexpensive once it is set up on our website as it enables individuals to solve their own need by exploring the support available to them.
- Where necessary, direct intervention will be undertaken to prevent homelessness
- The market place will give each household a bespoke Accommodation Options Plan
- Assistance will be available who find the website difficult to use.

Prevention

This would involve:

- Help to high risk households to avoid a point of crisis
- Prevention-based case work
- Support to enable people to remain in their home where this is feasible
- Investment of resources to prepare people to take control of their Accommodation Options Plan and ultimately the solutions necessary to prevent the homelessness risk reoccurring
- Target services to homeless families.

Stabilisation

This would provide:

- Sustainable discharge of Statutory Duties
- Excellent quality Temporary Accommodation that meets needs
- Directive casework to help find a longer-term home
- Wraparound support for those who need more than just a roof

Resolution

Undertaken by:

- Resolving homelessness for all applicants
- Exploring social and private sector options
- Building resilience and tenancy management skills
- Coordinating partnership support to break the cycle of homelessness, eviction and short-term solutions

2.3 Enabling the Model

The model relies on key components being in place to work.

Enabling the Accommodation Pathway Model			
Best in Class TA Solutions	Best in Class Housing Solutions	Best in Class Partnership Solutions	Best in Class Performance Framework
Right provision in the right place at the right price	Fair and efficient allocations and sustained tenancies	Strategic, holistic, delivering value- add outcomes	Compliance, performance, sustainable outcomes. See Table 3
Predictive Model to predict demand	Allocations Policy which is common to all partners and is flexible and fair	Landlord and Council risk sharing to jointly sustain tenancies	
Procurement Strategy based on sustainable costs	Supply and Demand modelling	Jointly commissioned support services	
Focused, performance driven service	Structured Customer Journey. See <i>Table 1</i>	Unlock PRS supply through a Social Lettings Agency	
Performance framework which optimises demand and throughput	Partnership Agreements. See <i>Table 2</i>	Identification and management of accommodation solutions	

Table 1

Structured Customer Journey			
Marketplace Advice & Guidance	Application & Assessment	Waiting list Management	Allocation Offer
TA ,Social, Private, Specialist, Low-cost Home Ownership	On-line Assessment & Triage	Self-managed Application	Nominations
Self-service Advice & Guidance	Personalised Applications	Change of Circumstance	Choice-based Lettings
Self-referral Pathway	Validation & Verification Framework	Automated Notifications and Reminders	Sensitive Lets
Assisted Choice	Support Services Referral	Scheduled Reviews	Targeted Advertising

Table 2

Formalised Partnership Arrangements			
Waiting list Management	Allocation Offer	Lettings	Sustainment
Waiting List Protocol	Allocations Protocol	Resulting Offer	New Tenancy Management
Joint Management	Application Verification	Resulting Application	Joint Solution Provision
List Management	System Delegated Authority	Multiple & Assisted Viewings	Tenancy Sustainment
Data Sharing Protocol	Bypass Verification	Hard to Lets	Migration Review

Table 3

Housing Service Performance Framework					
Compliance	Council Statutory Reporting	Landlord Statutory Reporting	Policy Application	Process & Evidence Audit	Policy Application
Service Performance	Service Access	Housing Register Management	TA Management	Allocations & Lettings Management	Partnership Management
Sustainable Outcomes	Customer Outcomes	Business Outcomes	Partnership Outcomes	TA Supply & Demand Modelling	Housing Supply & Demand Modelling

3.1 Eligibility

The South Norfolk Council Housing Register is a list of applicants who qualify for inclusion on the list. It will include homeless applicants owed a duty, applicants with a priority need owed a duty and existing social housing tenants residing in the region and seeking a transfer.

3.1.1 Special arrangements for 16 – 18- year old

- Anyone over the age of 16 is eligible to join the Housing Register if their current address is their only home, or sole residence, and they are not already registered through someone else's housing application.
- Applicants under 18 cannot legally hold a tenancy. If they are under the jurisdiction of social services and owed a duty under the Children Act, social services will act as a guarantor for those within 6 months of their 18th birthday under an existing protocol. This is subject to their ability to live independently and manage their tenancy. Social services will need to provide a support package to prevent the risk of losing the tenancy. The tenancy will be held in trust until they reach 18.
- Those not owed a duty under the Children Act, may still be granted a tenancy provided they can provide a suitable person to act as a guarantor such as a parent, legal guardian or relative. They will accept responsibility for the tenancy whilst the tenancy is held in trust until the applicant reaches 18.

3.1.2 Persons from Abroad

Some persons from abroad may not be eligible to join the housing register. These include:

- Under sections 160ZA (1), (2) and (4) of the Housing Act 1996 Broadland cannot allocate a tenancy, or nominate a person for housing, if they are a person who is ineligible for an allocation of housing accommodation by virtue of being a person subject to immigration control or a person from abroad who is prescribed as ineligible.
- Do not live habitually in the Common Travel Area (UK, Channel Islands, the Isle of Man or the Republic of Ireland);
- Do not have the right to live in the UK;
- Other categories of people who the Government may in the future, decide are not eligible for housing assistance.

The relevant regulations that apply to eligibility are:

- ❖ Regulations 3 and 4 Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006, SI 2006/1294
- ❖ All subsequent amendments including 'The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) (EU Exit) Regulations 2019 (SI 2019/861)

The rules are complicated and anyone who is impacted or believes they may be impacted can approach the Council for advice or seek independent legal advice.

The rules will change from 2021 due to the UK's exit from the EU and new regulations regarding eligibility for housing based on the EU settlement scheme. This policy will be amended to take into account any new rules.

3.2 Qualification Rules

Section 160ZA (7)) allows South Norfolk Council to define who will be regarded as qualifying and non-qualifying persons. Applicants, who are eligible for an allocation, must meet one or more of the following qualification rules in order to join the Housing Register:

- a) Have a recognised housing need (please refer to 4.4.11 Housing Priority Band)
- b) Have a Broadland local connection through one or more of the following:
 - Have lived in Broadland for 6 of the previous 12 months
 - Have lived in Broadland for 3 of the previous 10 years
 - Have a current contract of permanent employment where the job requires residency in Broadland
 - Have a family member (parent, adult child or adult sibling) who lives in and has lived in Broadland for a continuous period of at least five years.
 - Have an existing social tenancy and been in employment or training in Broadland for a minimum of six months and there is a reasonable expectation that the employment or training will continue for a further 12 months.
 - If they are residing in a supported housing project and approaching the Councils via a Move On arrangement, they will have to have resided at the project at least 6 months before submitting an application. If the specialist provider has a move on arrangement with the Council this will provide the local connection.
- c) Be homeless or threatened with homelessness (within 12 weeks and who are assessed as probably having a priority need) when the local connection criteria as laid down in the homelessness code of guidance would apply
- d) Be owed a Relief duty under the Homelessness Reduction Act, when the local connection criteria as laid down in the homelessness code of guidance would apply.
- e) Have been 'placed' or relocated outside the district due to illness, military service or other exceptional circumstances such as violence and lived in Broadland for at least 6 months prior to the placement.
- f) A young homeless care leaver under 25 years who has been looked after by Norfolk County Council for at least 2 years, including some time before they turned 16, under section 22A of the Children Act 1989.

- g) A care leaver age under 25 years, placed in accommodation in Broadland by another authority for at least 2 years, including some time before they turned 16, under section 22A of the Children Act 1989.
 - h) Are living in accommodation-based support services outside the district to which they were referred by or with the agreement of the Council and they lived in Broadland for 6 months immediately prior to the placement.
 - i) Be a current or former member of the British Armed Forces, having left service within the preceding 5 years, as defined by s.374 of the Armed Forces Act 2006.
 - j) Be a civil ex-partner of armed forces personnel and required to vacate a Ministry of Defence property.
- The spouse or civil partner of a deceased member of the regular forces where their death was attributable to that service
 - Current or former members of the reserve forces who suffer from a serious injury, illness or disability which is attributable to that service.
 - Victims of domestic abuse who are residing in a refuge or other safe temporary accommodation in Broadland as they have fled abuse from another area.
 - Applicants who have a connection to Broadland as a result of other special circumstances as set out in S199 of the Housing Act 1996 to be determined based on the individual facts of the case and in reference to statutory guidance on allocation schemes and homelessness.

Evidence of a connection to Broadland may be required to be provided. Where a connection to Broadland is through work (and in relation to the exemption for applicants through the Right to Move) employment must be physically located in the boroughs, not be short term or marginal or ancillary to work in another area or voluntary. Evidence of current employment or the offer of employment will be required.

Applicants who are disqualified as they meet one of the disqualification criteria can re-apply when their circumstances change so they would qualify.

- k) Be a gypsy (as defined in the Caravan Sites Act 1968) who has habitually resorted to the Broadland area.

All applications accepted onto the Housing Register will be subject to a review. **See Part 6**

3.3 The Armed Forces Covenant



South Norfolk Council is a signatory of the Norfolk Armed Forces Covenant. It is a voluntary statement of mutual support between a civilian community and the local armed forces community.

South Norfolk Council has created a Covenant Pledge to demonstrate its support, as an employer of choice, to the armed forces community. We believe that those who serve in the Armed Forces, whether Regular or Reserve, those who have served in the past, and their families, should face no disadvantage compared to other citizens in the provision of public and commercial services. Special consideration is appropriate in some cases, especially for those who have given most such as the injured and the bereaved.

In undertaking this covenant, we:

- ❖ Disregarding injury and disability payments; whether these are periodic or a lump sum
- ❖ Overlooking lack of connection for current and former members instead, we allow up to 5 years for divorced and separated spouses.
- ❖ All applications qualify from current or former members (having left service within the preceding 5 years, as defined by s.374 of the Armed Forces Act 2006)
- ❖ If they are divorced, separated or a civil partner of service personnel required and are required to move out of Ministry of Defence accommodation, they will qualify
- ❖ If they have to move from an unsuitable property as a result of injuries sustained while in the Armed Forces, they will be awarded the highest priority band.
- ❖ If they have a Housing Need Priority and they meet the local connection qualification they will also be placed in the highest priority band.

3.4 Non-Qualification Rules

An applicant will not qualify for an allocation where:

- a) They have been housed by a scheme landlord, through a partner landlord within the preceding year, unless there has been a change in circumstances resulting in a priority need.
- b) They have been housed through the Council's Rent Advance & Deposit Scheme within the preceding year, unless there has been a change in circumstances resulting in a priority need.
- c) They are under 18 and do not have a guarantor and cannot show they will be supported in a tenancy where the Council assesses that support is needed to sustain a tenancy.
- d) They, or a member of their household, have been evicted from a tenancy and has neither had a settled period of a minimum of six months nor met the criteria for reassessment, since the eviction.

- e) They, or a member of their household, have been evicted from a property for mortgage arrears and has neither had a settled period of a minimum of six months nor met the criteria for reassessment, since the eviction.
- f) They, or a member of their household, is/was responsible for paying rent and they have rent arrears and/or court costs greater than 16 weeks rent, if the rent is charged weekly or greater than 4 months if the rent is charged monthly **and** they have not met the criteria for reassessment. This will apply equally whether they pay the rent in full, are on partial housing benefit and they pay the shortfall or are in receipt of full housing benefit where the arrears are solely the responsibility of the tenant. In respect of housing benefit an exception may be made if they have provided the information required and the claim is being reassessed.
- g) They have made a fraudulent claim for housing and/or housing benefit or provided false information.
- h) They, or a member of their household, has caused damage to a property and been charged for damages and/or recharges and/or court costs of over £1000.
- i) They, or a member of their household, has been evicted for anti-social behaviour or unacceptable behaviour and there has been no demonstrable evidence of behaviour change in settled accommodation.
- j) They, or a member of their household, own a residential property and have the financial means to find their own housing solution. Exceptions may be made where there is demonstrable hardship and the applicants would qualify for sheltered accommodation or housing with care. An exception may also be made if a court order is in place rendering their property is not suitable for habitual residence.
- k) Failure to bid. Exceptions may be made around s106 properties or properties which are hard to let and the applicants can demonstrate they can afford the unit.
- l) Applicants who are considered to have sufficient financial resources to secure accommodation within the private sector
 - a. 'Sufficient financial resources' includes any assets or investments even if they are not immediately available to the applicant, such as any residential or non-residential property that they own, or part own anywhere in the UK or abroad.
 - Any lump sum received by a member of the armed forces as compensation for an injury or disability on active service will be disregarded.
 - They will not be awarded a priority housing need.
 - They will be advised on low cost home ownership schemes, such as rent to buy, shared ownership/equity, discounted market sale and starter homes, sheltered accommodation and housing with care, or lower demand properties.

3.5 Exceptional or Mitigating Circumstances

Each application will be assessed individually. Exceptional and/or mitigating circumstances will be considered and the council will be able to exercise its discretion. If it can be shown that they now qualify they will be placed in a suitable band. However, if there is still concern in relation to their behaviour or ability to pay the rent, their application may be suspended or made inactive for bidding until a suitable pattern of behaviour has been demonstrated over a period of 6 months or more. The factors will be assessed against the Accommodation Pathway Model. **See Part 2**

The following are factors to be taken into account in determining non-qualification or reduction of preference and subsequent management of their application to either suspend or prevent from bidding.

- Physical disability
- Mental illness and/or severe depression
- Physical illness or frailty
- Special educational needs
- Learning disabilities
- Financial resources or substantial debt problems
- Low income/benefit recipient
- Support or floating support needs
- Rooflessness/homelessness
- Inability to find alternative accommodation
- Size of family (including young children)
- Known forms of violence have occurred including domestic abuse and neighbour disputes.

This list is not exhaustive and could apply to an applicant or a member of the household. Depending on the number of factors present, the severity and their relevance to the overall situation, the effect could be a non-qualification or reduction of preference or it could lead to a non-qualification being changed to a reduction of preference. Non-qualification means the applicants cannot join the housing register. Reduction of preference means the applicant can join the register but their ability to bid may be restricted or their application suspended for an agreed period of time and subject to a set of conditions.

3.6 Reassessment of applications who have not qualified

Applicant who have failed to qualify will need to provide the evidence if their circumstances have changed to initiate a reassessment. If the reassessment is successful and they now qualify, they will be treated as reduced preference and either suspended or made inactive for bidding for an agreed period of time.

The table below summarises the causes and evidence required to mitigate it.

Cause	Evidence
They are in arrears of rent in advance and deposit loan or other debt owed to the Council.	Repayment plan in place and adhered to for a minimum of six months or the debt has been cleared by regular payments whichever is sooner
Eviction from a tenancy for rent arrears	Minimum six month settled accommodation with up to date rent

Cause	Evidence
	account. Repayment plan in place and adhered to for a minimum of six months
Eviction from a property for mortgage arrears	Minimum six month settled accommodation with up to date rent account. Repayment plan in place and adhered to for a minimum of six months
Responsible for paying rent and they have rent arrears and/or court costs greater than 16 weeks rent, or if the rent is charged weekly or greater than 4 months if the rent is charged monthly. This will apply equally whether they pay the rent in full, are on partial housing benefit and they pay the shortfall or are in receipt of full housing benefit where the arrears are solely the responsibility of the tenant.	Up to date rent account (where relevant) and repayment plan in place and adhered to for a minimum of six months or the debt has been cleared by regular payments, whichever is sooner. Confirmation of information provided for a housing benefit claim to be assessed.
Damage to a property and been charged for damages and/or recharges and/or court costs of over £1000.	Repayment plan in place and adhered to for a minimum of six months or the debt has been cleared by regular payments whichever is sooner
Eviction from a tenancy for anti-social behaviour	Minimum six month settled accommodation with no complaints relating to behaviour.

3.7 Safe Surrender Agreements

Where a tenancy is failing but has not yet met the threshold for non-qualification and resulting reduced preference, a Safe Surrender Agreement may be considered which enables the surrender of the tenancy before the situation escalates to a crisis and/or eviction. It should be agreed before the tenancy is surrendered.

The agreement is between Landlord, Tenant and relevant Council

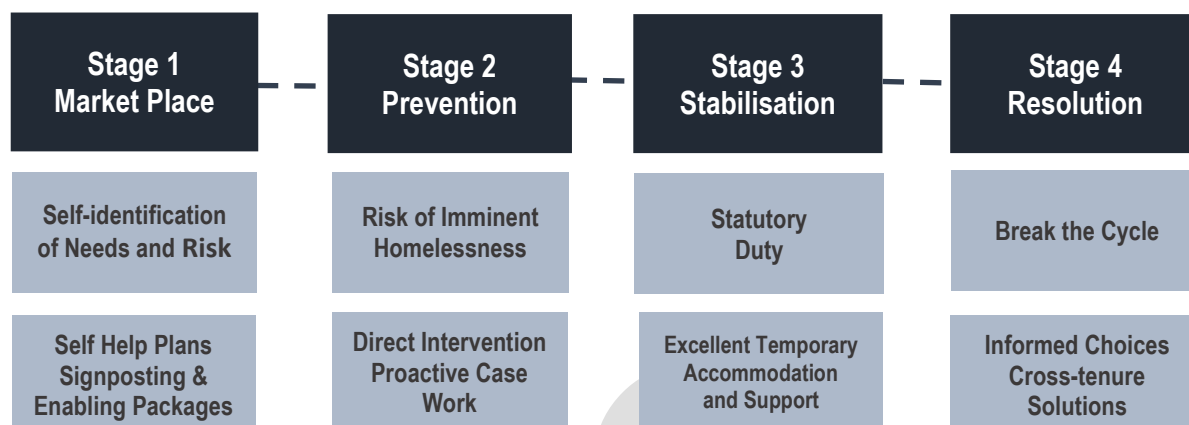
If the agreed the conditions are:

- The tenant will give usual 28-day notice.
- The partner landlord may agree a shorter notice period at their discretion.
- The tenant must be unable to manage the tenancy due to illness and/or other support needs which cannot be met at that time.
- Where the property is in danger of deterioration but substantial deterioration (under £500) has not yet occurred and does not occur before vacant possession is given.
- The tenant is struggling to pay the rent, but the rent account is not yet more than 8 weeks in arrears (net) and does not become so before vacant possession is given.

- f) The tenant is in breach of other terms of the tenancy, but this has not yet reached the level where a reduction of preference would usually be applied and does not become so before vacant possession is given.
- g) Applications submitted under a Safe Surrender Agreement, will not have reduced preference applied provided no further issues become known subsequent to the agreement.
- h) Their priority will be assessed according to current need and circumstances. If a subsequent homelessness application is made, the existence of a safe surrender agreement will allow the Councils to take this into account when making their decision.

The Safe Surrender Agreement is considered both a prevention and stabilisation under the Accommodation Pathway Model. **See Part 2.** It shows the tenant is being responsible and taking the necessary action and has taken the time to negotiate safeguards. This reconciles with the promotion of tenancy sustainment. **See 5.5**

Allocation Pathway Model



The model relies on an allocation plan for anyone who approaches the Council. This might be designed online the applicant self-supporting or with assistance from a third party or a Council Officer. Where they identify arrears or ASB or homelessness, prevention measures will be explored and then a period of stabilisation introduced. If social housing is a realistic option, they will submit an application and the Allocation Scheme is initiated.

Stabilisation will address reduced preference and non-qualification in that the application may be submitted under the reassessment process outlined in part 3 and a reduced preference awarded which either means their application will be suspended during the period of stabilisation or they will be LIVE but prevented from bidding.

4.1 The Application Process

The Key Stages



Submission: The application to join the housing register or rent a pitch.

Verification: Confirming and investigating the evidence needed to assess the application

Assessment: Assessing eligibility, qualification, non – qualification, reduced preference, priority need

Notification: Formal notification of the outcome of the assessment of the application

4.2 Submission



The application to join the housing register is online via the market place which is located by following the link. **URL to be supplied**

The application can be submitted by one of the following:

- a) When you enter the market place website by clicking the link to the housing register, it will ask you for your name, date of birth and national insurance number and if we already hold an application for you it will advise you on what to do next. If not, it will take you to the electronic online form. You will be offered assistance via a web chat facility if you need it.
- b) Or an application may be submitted as part of your advice session which you will be offered if your navigation through the market place provides you with this option.
- c) Alternatively, if a prevention interview is needed, the application may be submitted here.
- d) If you are being referred by one of the agencies we work with, they will navigate the market place with you and as part of this they may assist you to submit an application if this is deemed one of your options.

Wherever you enter the allocations scheme system, you will be given a unique identification number. This is not an application (housing register) number which is only issued once we have assessed your application. The identification number will enable you to use the market place as an account. You will be asked to create this account when you log on for the first time. The account will hold a user name and password and these should be held by you to access the account. When an application form is submitted, we will match your identification number to the application. This prevents duplications.

The Allocations Scheme is supported by our Housing and Benefits Service. They are responsible for:

- Providing the advice via a web chat or in person
- Assisting you in navigation of the market place.
- Conducting prevention interviews.
- Agreeing stabilisation plans
- Processing the intended housing solutions including applications to join the housing register.

Once you have submitted your application and based on the sections of the form you have completed, the system will:

1. Acknowledge your submission with a date and time email.
2. Provide you with a statement of how your application will be processed.
3. Indicate the time needed to process your application.
4. Provide you with a list of evidence we need in order to verify your application. We usually need originals to be seen in one of our offices. You will be advised where to take the evidence.
5. Provide you with the average waiting times for the types of accommodation in the areas you have chosen.

4.2.1 Applicants without a fixed address.

Applicants with no fixed address can request for correspondence about their application to be sent to the care of another address. If no other address is available, the Housing and Benefits Service will hold the correspondence and take reasonable steps to contact the applicant to inform them that correspondence needs to be sent to them and to agree a way of sharing the correspondence.

4.2.2 Joint Applicants

Joint applications will be accepted and will be treated as one application. The housing need of the full household will be considered in assessing housing need. Joint tenancies are normally granted where applicants have a long-term commitment e.g. married and unmarried couples, civil partners but this decision is down to the individual partner landlord who will decide whether to allow a joint tenancy in accordance with their own rules.

Carers cannot be a joint applicant unless they are already a member of the permanent household and are providing a carer role in addition to their prior and existing relationship with the applicant.

4.3 Verification



Verification requires the production of information to support the priority needs of the applicant or a member of their household and an investigation into its authenticity. Information will be required as follows:

- a) At the point of submission in order to make the initial assessment.
- b) At the point of a review to affirm the assessment.
- c) At the point of a change of circumstances to make a reassessment.
- d) At the point of offer of accommodation if either the last review was over 12 months or confirmation of new circumstances comes to light.

It is South Norfolk Council's responsibility to ensure an application is verified before an allocation is made. It is the applicant's responsibility to provide the information required by the date indicated and to cooperate fully with the investigation.

Where proof cannot be supplied; the reasons will be determined, and a decision must be made by a senior officer on whether the application can be processed.

4.3.1 Proof Required

For every person on the application we must normally see at least two of the following forms of proof of identity - one of which must be a photo ID, and proof of where they currently live and previously lived:

- full birth certificate
- medical card
- marriage certificate
- driving licence
- national insurance card
- Passport.

In order to assess whether the qualification rules are met and to undertake the assessment the applicant will also be asked to provide independent documentary proof of the following:

- relationship to and between all those named on the application
- immigration status
- the property you currently live in – where, the occupation status and how long
- previous property details and reasons for moving
- if you have a local connection with the Local Authority area
- salary levels, proof of income e.g. pay slips, P60
- formal evidence proving separation and relationship breakdown
- main bank account into which benefits, or salary is paid
- details of savings held including stocks and shares
- title deeds of any properties owned and/or mortgage details
- school letters
- utility bills
- proof of benefits including proof of receipt of child benefits
- residence order
- other relevant court orders
- evidence of medical conditions and how it is impacted by your housing
- evidence of mobility or physical disability and how it is impacted by your housing
- MATB1 as evidence of a pregnancy
- Notice to Quit where notice has been served
- evidence to support welfare or social reasons for moving
- evidence of unspent criminal convictions (a Disclosure and Barring Service (DBS) or police check may be subsequently).

This list is not exhaustive, and alternatives may be requested. In the case of mobility or physical disability, the Councils will use Occupational Therapists to make an assessment where required.

4.3.2 Household Splits

Where children live with one person, but another person has access where they stay with them some of the time, and in the absence of a Residence Order from the courts, a combination of this evidence must be provided which determines the length of time spent with the main carer. i.e. their habitual residence. Children cannot usually appear on more than one application.

4.3.3 False information

The application form states that under the Housing Act 1996 and Homelessness Act 2002, it is a criminal offence for anyone to knowingly give false information or to withhold relevant information if reasonably required to give it, on any matter regarding the allocation of housing. In addition, applicants will be advised that should an applicant be successful in obtaining a tenancy from one of the partner landlords by knowingly or recklessly making a false statement then the landlord would seek possession of the property and may result in prosecution leading to a fine and/or imprisonment.

4.4 Assessment



4.4.1 Assessment of housing need

All applicants who are eligible and qualify to join the Housing Register will be assessed for housing need. The law requires that reasonable preference for an allocation must be made in the following cases:

- a) People who are homeless within the meaning of Part 7 of the Housing Act 1996 as amended by the Homelessness Reduction Act. **See 4.4.2**
- b) People who are owed a duty by a housing authority under relevant housing and homelessness legislation.
- c) People occupying unsanitary (unhealthy) or overcrowded housing or otherwise living in unsatisfactory housing conditions.
- d) People who need to move on medical or welfare grounds, including grounds relating to a disability.
- e) People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or others).
- f) South Norfolk Council prioritises local housing for local people and will give additional preference to local connection specifically in relation to:
 - Properties built under a s106 agreement
 - Local lettings plans
 - Rural lettings schemes
- g) Additional preference is given under the Armed Forces Covenant. **See Part 3.**
- h) Additional preference may be given to certain groups of people in order to meet local and priority need.

Applicants are placed in the South Norfolk banded priority award suitable for their circumstances.

4.4.2 Homeless Assessment

Applicants presenting as homeless within the meaning of Part 7 of the Housing Act 1996 as amended by the Homelessness Reduction Act will be subject to a homeless assessment to assess the following:

- a) Whether homeless prevention measures can keep the applicant in their home.
- b) Whether the applicant is going to become homeless in the next 12 weeks.

- c) Whether the applicant is already homeless and is owed a relief duty.
- d) Whether the applicant is intentionally homeless and thereby is owed a reduced preference.
- e) Whether a Safe Surrender Agreement prior to tenancy surrender prevented imminent homelessness.

South Norfolk Council will use a toolkit to undertake the homeless assessment. They will then be placed in the relevant priority band. We use a toolkit to assess and interview homeless cases. If they are assessed as being owed a relief duty, we use a Temporary Accommodation Operational Manual to process the application further,

See associated document: Homeless (Part 7) Case Assessment and Interview Toolkit

See associated document: Temporary Accommodation Operation Manual

4.4.3 Temporary Suspension of Bidding

Applicant who have failed to qualify and are subsequently reassessed so that they now qualify will be treated as reduced preference. If you have reduced preference it means that you will be awarded the correct priority band for your circumstances, but your allocation will be held for the agreed period of time to enable stabilisation. This allows the applicant to demonstrate their ability to meet tenancy conditions in the future.

This will be achieved by:

Inactive to Bid: The application is made inactive. There is a period of stabilisation which allows the applicant to improve their tenancy management skills and increase the probability of tenancy sustainment.

We do not operate a reduced preference band, as this still allows a reduced preference applicant to receive an offer of accommodation. If they have failed to address the behaviour that led to their reduced preference award, they are a high risk of tenancy failure and this is not in keeping with the Accommodation Pathway Model.

Likewise, we do not allow them to bid and then bypass them for selection. This is not in keeping with a fair and transparent policy.

4.4.4 Transfer assessments

Social tenant applications (transfers) with a local connection will be accepted and assessed in accordance the following being met:

- a) Eligibility
- b) Qualification
- c) Housing need

South Norfolk Council transferred their stock to a partner landlords operational in the area under a stock transfer agreement which preserves the rights of tenants to transfer using the Housing Register. This has been further expanded to allow all partner landlord tenants with a local connection to utilise the Housing Register to effect transfers.

4.4.5 Child of Tenant

This is a scheme which rehouses adult children within a household with the aim of alleviating overcrowding while allowing the family as a whole to remain in their community.

Specific Criteria:

- ❖ It would apply where the main household has already got an overcrowded priority.
- ❖ 18 years olds+ could potentially be given their own allocation subject to an application being submitted to be considered as a single person.
- ❖ The application of the 18 year-old+ would reflect the overcrowding priority award of the main household.
- ❖ It is subject to the agreement of the 18-year-old+ and parent/guardian.
- ❖ It must alleviate the overcrowding by at least one bedroom.
- ❖ The main household and child's application would be linked so that when the child is allocated, the main application is flagged for review. If overcrowding is the only priority and this has been fully alleviated, then the main application will be treated as rehoused and the application closed.
- ❖ If the main household has another priority need besides the overcrowding it will be reassessed as a change of circumstance.
- ❖ The 18-year-old+ must be deemed as ready to move and able to afford the property and sustain their tenancy.

4.4.6 Priority on Health Grounds

Priority on health or disability grounds will only be awarded after an assessment if someone in the household has a severe long-term limiting illness, or a permanent and substantial disability AND their health or quality of life is severely affected by the home they live in.

A priority medical award is not given on the basis of the medical condition or disability alone but upon the effect the housing circumstances are having on a long term and serious medical condition or disability. We will also consider if where you live now can be reasonably adapted to meet your needs. It may also be that there are combinations of serious health or disability concerns that mean that the health or quality of life of a household is being severely affected.

The Housing and Benefits Service will undertake the assessments and may ask qualified health advisers for advice and/or recommendations in relation to the condition and the impact their housing is having on that condition or that of the household. Occupational Therapists are usually used to assess housing requirements for mobility and physical disability cases. Any evidence you supply will be considered fully and further evidence may be requested.

Other recommendations that can be made on health grounds such as:

- a) The type of property that is most suitable and essential on health grounds. This can include access, space, location, or access to a garden.
- b) When a property with one of these features is advertised, preference for it may be given to applicants where a recommendation by health advisors has been accepted.
- c) Use of a garden for safe supervised outdoor play area by a child under 18 in your household with one of the following:
 - a permanent and substantial physical disability
 - severe long-term limiting illness
 - the severest forms of learning disabilities

- the severest forms of behaviour problems.
- d) Use of a garden for an adult in the following circumstances:
 - if they have a cognitive impairment that means they do not sense danger
 - at risk of wandering and so need constant supervision
- e) A garden may be recommended if:
 - if they have a severe, permanent and substantial disability or severe long-term limiting illness
 - limiting illness and caring for children is causing concern such that their continued residence is at risk
 - stress of caring for them is exacerbating the health problems
 - they have a sensory impairment and/or a guide dog and they live alone or only with others with disabilities.
- f) Extra space may be recommended if:
 - you, or someone in your household, has either a permanent and substantial disability, or a severe long term limiting illness, or the severest form of learning disabilities or behaviour problems and it is unreasonable for you to share a bedroom as it would seriously affect the sleep of those you would normally share with, to the severe detriment of their or your health
 - you are having health treatment at home that needs large machinery or a stock of health supplies to be stored e.g. you are having renal dialysis at home
 - you need a full-time Carer to provide support night and day
 - you have a permanent and substantial disability or long-term limiting illness or severe learning disability and need additional space for specialist equipment
 - you have a severe long-term limiting illness and sharing a bedroom will exacerbate your health problems e.g. you have an immune deficiency.
- g) Ground floor or category A or B wheelchair accessible on health/ disability grounds
- h) An additional recommendation that can be made is that an applicant must have ground floor on health or disability grounds or must have a ground floor property that is wheelchair accessible category A or B. This may be recommended if you have a permanent and substantial disability or severe long- term limiting illness that means that your mobility or exercise tolerance is so severely restricted you cannot safely manage any stairs.

4.4.7 Care Leavers

Young people in local authority care will work with the Council to navigate the Accommodation Pathway Model. They will enter the Market Place with the assistance of social services to set up an accommodation plan. All the tenancy preparation and support measures they required to sustain a tenancy will be explored together with the possible housing solutions. Once they are stable and ready to move their application will be activated. This will be no sooner than 6 months before they reach 18 years old. This will be done jointly with the Housing and Benefits Service and social services. It is usual for applicants coming through this route to be vulnerable and therefore it is especially important to get the assessment right. For their eligibility and qualification. **See Part 3**

4.4.8 Move On

Applicants in supported housing with a specialist provider will work with the Council to navigate the Accommodation Pathway Model. They will enter the Market Place with the assistance of their specialist provider to set up an accommodation plan. All the tenancy preparation and support measures they required to sustain a tenancy will be explored together with the possible housing solutions. Once they are stable and ready to move their application will be activated. This will be done jointly with the Housing and Benefits Service and the specialist provider. It is usual for applicants coming through this route to be vulnerable and therefore it is especially important to get the assessment right. For their eligibility and qualification. **See Part 3**

4.4.9 Elected Members or Employees and Close Relatives

Elected Members:	The application will be assessed by a relevant manager of the Council. The award of priority (housing need band) must be authorised by the Council's Chief Executive Officer.
Current or Former Employees:	The application will be assessed by a relevant manager of the Council. The award of priority (housing need band) must be authorised by the Council's Director with the responsibility for Housing.

4.4.10 Pitches for Gypsies and Travellers

Applications for these pitches are through the same route as applicants for Housing Register. A landlord reference is required. If it is their first pitch application and they have no reference, they will need to provide a guarantor, usually an existing pitch holder with a good record. They are assessed and awarded a priority need band. There may be an additional assessment of any site-specific factors. The assessments will be in accordance with Gypsy and Traveller Site Management Good Practice Guide (Published by Communities and Local Government July 2009) and will include consideration of the balance and mix in the community, therefore prioritising the long-term cohesion of the site.

Specific Considerations:

- a) Extra support with the process is offered to applicants where it is needed.
- b) The pitches are not advertised on the website and these are covered as direct lets. **See Part 5**
- c) A degree of limited discretion in allocating pitches is required and should not be automatically bound to the household with the highest priority. The Councils will have the discretion to offer pitches other than the one applied for to prevent the household residing on an unauthorised encampment.
- d) Sites are often occupied by extended family groups and this can help to ensure good community relations on the site. In some exceptional circumstances the Councils may, in consultation with the site manager, want to take account of factors which a pitch allocation may have in adversely affecting the suitability of the site as a social unit.
- e) If as a result of an assessment of their application, the landlord has good reason to be concerned about the risk of conflict with existing residents, they should take up this issue with the applicant, and carry out a risk assessment. Refusal to allocate a pitch must be based on the merits of the application, without undue influence from those already on a site.

- f) The landlord will confirm the landlord reference with the applicant.
- g) The landlord reserves the right to withdraw any offer which may have been granted on the basis of incorrect information.

4.4.11 Housing Priority Bands

Each application will be assessed to determine the level of housing need of the household and placed into one of four bands:

Band	Priority Need
Band 1 Urgent	People with an urgent medical need inc. hospital discharge
	People with an urgent need for an adapted property
	If your home has been destroyed by a disaster
	Homeless and fleeing/threat of violence (with or without local connection)
	s193 Duty and in TA/s189 Relief Duty
	Witness Protection
Band 2	Threatened with Homelessness (next 12 weeks)
	High Medical Need
	High Welfare
	Current tenant in an adapted property they no longer need
	Current tenant willing to take a smaller property
	Disrepair/Unsafe Home/lacking essential amenities
	Overcrowded by 2 or more bedrooms (affordability test)
	Someone needing an adapted property
Band 3	Care Leavers
	Threatened with Homelessness (next 12 weeks)(no priority need)
	Medium Medical Need
	Medium Welfare Need
	Lack of Amenities
	Overcrowded by 1 or more bedrooms
	Tenant under-occupying by 1 or more bedroom (affordability test)
	Move On
	Have a need to move to the Broadland area where failure to meet that need would cause hardship to themselves or others.
Band 4	Intentionally Homeless

Band	Priority Need
	s193 Duty (not ready to move)
	TA (assessment in progress)
	Meet eligibility/qualification
	No Housing Priority Need

Band Considerations:

Cumulative Need:

We do not operate a banded system with cumulative need. If you have more than one priority need (reasonable preference allocation). We will use your highest priority to place you in the correct band.

Time Waited:

You will be placed in the priority band in effective band date order. Those who waited the longest will be the highest in the list. **See 4.4.12** to see how we determine your effective band date.

Suspension of Bidding:

We do not operate a lower band for reduced preference. Instead we manage this within the administration of the housing register and bidding process. In this way we promote good tenant behaviour and sustainable tenancies. **See 4.4.3**

Adequately Housed:

You will be in band 4. If you are adequately housed. You will still get the benefit of any S.106 PROPERTIES, AND ANY TRANSFERS THAT BECOME AVAILABLE.

4.4.12 Determination of Effective Band Date

In order to determine your effective band date, and provided there is no delay in providing the information required within the time stipulated, we use the following:

- ❖ Your first assessment, we will use the date you submitted your application
- ❖ If you have a change of circumstances and your priority need changes and you go up a band, we will use the date your new priority was awarded.
- ❖ If you have a change of circumstances and your priority need changes and you go down a band, we will use the same effective band date you had in your original band.
- ❖ An assessment and award of priority cannot take place without the supporting evidence. If you fail to provide this at the point of submission or the date you advised us of the change of circumstances, we will use the assessment date as the effective band date.
- ❖ If you are statutory homeless, the effective band date will be the date we accepted a statutory duty under the homeless legislation.
- ❖ In the unlikely event more than one applicant bids for the same property and they have the same effective band date, we will consider the type of priority awarded and the urgency of the priority to determine who will be allocated the property.

4.4.13 Household Type and Property Size Allowed

The legislation states in order to allocate a property we must ensure all of the following:

- The size of the property must be suitable for the household need
- Landlords must make best use of their stock
- The property must be affordable for the applicant it is allocated to
- It should be possible for the applicant to sustain their tenancy if the property is allocated
- The household's circumstances must be fully considered
- The property is allocated in accordance with the South Norfolk Council Allocations Scheme.

The table below shows how we allocate property size. For further clarification and definition of the room and space standards. **See Appendix 2: Allocation by Bedsize**

Household Type	Property Size	Conditions
Single Person	Any 1 bed property or 2 bed above ground Floor	2 beds will only be allocated where a property is deemed hard to let. It is allocated subject to affordability and sustainability.
Couple	Any 1 bed property or 2 bed above ground Floor	2 beds will only be allocated where a property is deemed hard to let. It is allocated subject to affordability and sustainability.
Carer	A bedroom will be allocated if the carer needs to reside in the property and is not already part of the permanent household	Subject to an agreed medical need for a Carer. Evidence of Housing Benefit and/or Disability Living Allowance will need to be at enhanced levels. Young carers treated as if they are 16+
Medical	A bedroom will be allocated if recommended as part of the medical need	Subject to an agreed medical need where the extra room may be needed to accommodate large equipment or there are serious mobility issues.
Child Residency	A bedroom will be allocated for a child resides as part of the household 4 nights per week or more and we have evidence they are part of the applicants household	Subject to evidence such as Child Benefit and/or Custody Order. We will not allow the same children on more than one application.
Unborn Child	Provision will be made for an unborn child provided we have evidence	Subject to evidence of a MATB1 issued by NHS confirming the pregnancy. The unborn child will be treated as same sex. The overcrowding priority will not be awarded until the child is born and a birth certificate has been provided. The applicant will be able to bid without the

		overcrowding award. The date of birth will be used to determine the effective band date.
16+	Own Bedroom	The child is deemed in need of their own personal space.
Sex Separation	Children of the opposite sex will only be allocated their own bedroom when they are 10 years or older	This reflects the current benefits position.
Students	Living away from home will not be treated as part of the main household	Where a household normally includes a family member who currently lives away from home studying at college or university that family member may be considered part of the household for the duration of the initial course. This will usually be up to 3 years. Evidence of the end date of the course must be provided and a reassessment will be made following the end of the course. Post graduate study may not be covered by the above criteria. This ties in with Housing Benefit.
Under Occupation	Allow under occupation by 1 bedroom	This will only apply where a property is deemed hard to let and subject to affordability and sustainability.
Ground Floor	Ground floor units will be prioritised for medical need where possible but ultimately, we will make best use of stock.	We will advertise clearly to show how we allocate ground floor properties. We will seek to be fair to applicants and partner landlords. Some partner landlords may restrict upper floors when a household has children for safety reasons, and this will show in the advert.
Adapted	Adapted units will be prioritised for medical need applicants who require the specific adaptations in the property.	OT assessments will be used to assess the requirements of the household.

4.5 Notification



Once an application has been assessed the applicant will be notified in writing of the following:

- ❖ The band in which they have been assessed
- ❖ The size and type of property they qualify for

- ❖ How to access the Scheme Guide in order to bid for properties
- ❖ Their Housing Register number
- ❖ Their bidding reference number
- ❖ Their right of review of their band and property size/type eligibility
- ❖ Qualification under reduced preference where relevant, the conditions imposed and the reassessment process.

4.6 Cancellation of Applications

Applications will be cancelled for one or more of the following reasons:

- a) The applicant requests cancellation
- b) The applicant's circumstances change, and they are no longer eligible or no longer qualify
- c) The applicant has not responded to a review of their application within the 28 days requested.
- d) The applicant is found to have made a false or deliberately misleading statement, or to have withheld information in connection with their application.
- e) The applicant has not placed a bid for 12 months
- f) The applicant has not responded to contact from the Council within the 28 days requested.
- g) The applicant has failed to provide the evidence required to assess their application.
- h) If cancelled, the applicant will need to review and update their accommodation option plan. A review via the market place will take place to enable this.

4.7 Change in circumstances

A change in circumstances must be notified to the Council immediately together with any supporting evidence. Failure to do this could result in an applicant not being considered for a property. This is because priority is based on the applicant's current situation. A change in circumstances will mean that an application has to be reassessed.

4.8 Deliberate or worsening circumstances

Where there is evidence that an applicant has knowingly and deliberately made their housing situation worse in order to gain a higher priority on the register, the assessment of their priority need will be based on the circumstances before their situation changed through their actions to deliberately worsen their circumstances.

Some of the examples are listed below:

- Applicants who have allowed family members or others to move into their property, who previously had suitable accommodation or the financial means to secure their own accommodation, and this has resulted in the property being overcrowded.
- Applicants who have moved from previously suitable or more suitable accommodation which it was reasonable for them to continue to occupy, into a less suitable property.
- Homeowners who have transferred their property to another family member within the last 5 years from the date they make their application to the Register.
- Applicants who have given up affordable and suitable private rented accommodation which they are able to maintain, to move in with other relatives or friends, creating a situation of overcrowding and/or sharing of bathroom/kitchen and/or a split household.

- Requesting or colluding with a landlord or family member to issue them with a Notice to Quit.



5.1 The Allocations Process

The Key Stages



Property Identification: Notification by the agent or partner landlord of a property that is available to let

Expression of Interest: The applicant either bidding or agreeing to view a direct offer

Letting: Offer, viewing, resulting the offer and lettings types

Tenancy Sustainment: Sign up and continued supervision of new tenancies with support

5.1.1 Blended Allocations

The South Norfolk Council Allocations Scheme combines allocations by direct lets and choice-based lettings as a blended system. The majority of properties are advertised through the choice-based lettings system. Applicants have their own accounts and access the system via online. They are able to bid for a property. The list of bidders are shortlisted and the highest priority applicants is usually put through to the partner landlord who owns the property.

However, there are times when the properties are not advertised, instead they are matched direct to an applicant and the applicant is nominated to the partner landlord who owns the property. These are called direct lets and they are used to manage the most urgent or specialised cases.

Matching and Shortlisting will prioritise active cases. Where this is exhausted the inactive list will be used and selection is subject to:

- Satisfactory progress during a stabilisation period
- Tenancy failure is low risk
- Agreement by the partner landlord.

5.1.2 Predicting Properties

The Council will use information provided by the Allocations Scheme to predict the number, type and location of properties due for letting. This is undertaken on a strategic and operational level in order to meet the needs of the applicants the Scheme is designed to house.

Annual Lettings Plan:

Each year an annual lettings plan will be produced based on consultation with the Housing Enablement Team who are responsible for overseeing all the properties being built in the area. They will have expected handover

Supply and Demand Modelling:

dates which will be affirmed by the partner landlord who is building the properties. Based on averages in previous years it is also possible to predict how many properties already in management with the partner landlords will be expected to become empty (void). The plan is usually broken down into quarters and by partner landlord and then further as new build and relets. It should also be possible to assess whether they are specialist units such as Housing with Care, sheltered, adapted, or general use (general needs). Partner landlords will make properties available under agreement. In order to plan longer term, a supply and demand model is used to determine the types, size, numbers and locations where properties need to be developed. This is known as the supply. The demand is the number of applicants on the housing register and the type, size and location of the properties they need. The Housing and Benefits service will work with the Housing Enablement Team and the partner landlords to undertake this exercise. Ideally the model should aim to predict 3-5 years and longer if possible. The predictions are used by the housing developers to undertake scheme appraisals in the required areas.

5.2 Property Identification



When a partner landlord has a property that is available to let, they notify the Councils. South Norfolk Council will monitor the number of properties they receive from each partner landlord and then determine whether they need to match it to an urgent applicant as a direct let or advertise it as a choice based letting. Each month end and quarter end, the totals will be reconciled against the predicted properties in the annual lettings plan and against the targets set for direct lets and choice-based lettings. There may be other targets which will also need to be factored into the allocation.

Therefore, the allocation of a property takes place on two levels:

- a) At letting type
- b) At applicant level

5.2.1 Direct Lets

South Norfolk Council will make a direct let in the following situations:

- a) Where a property is needed urgently to deal with an emergency or to provide temporary accommodation for a homeless family.

- b) Where an allocation is required to ensure protection of the public, for example, following a decision made by a Multi-Agency Public Protection Panel meeting or to fulfil agreements made with offender management services, or where a customer has been referred as part of the witness protection scheme. These are usually referred to as sensitive lets. **See 5.2.8**
- c) Where a customer's home is being repaired and they need to be moved from the property on a temporary or permanent basis.
- d) Where the applicant has enjoyed an established occupancy of the property, has a reasonable expectation of a property of that type and would be a suitable tenant (e.g. former tenants of the property, non-secure or introductory tenants or carers or family members with no succession rights). A tenancy reference will be obtained to verify the decision.
- e) Homeless and in TA under s189B(2) relief duty or main duty – use of TA
- f) Urgent rehousing requirement: property, health, personal safety, discharge of homelessness duty the allocations needs to be undertaken quickly.
- g) Duty to house under s39 land compensation act 1973.
- h) Failure to bid.
- i) The applicant has exceeded the number of offers they are allowed, and their refusal has been deemed unreasonable.
- j) Adapted units.
- k) Vulnerable applicants where they would find bidding problematic.
- l) Pitches for Gypsies and Travellers.

If a direct let is needed for other reasons it requires the approval of the Allocation Scheme Panel will make the decision. **See Appendix 3: Terms of Reference for the Allocation Scheme Panel.**

5.2.2 Choice Based Lettings

The main method of allocation is via choice-based lettings and the majority of properties are advertised in order for applicants to be able to choose. There will be specific restrictions:

- Applicants can only bid for the property type and size they are allowed. **See 4.4.14**
- 80% of the properties advertised will be open for bidding by all applicants.
- 20% of the properties advertised will be targeted for social landlord tenant transfers only. **This will need to be reviewed if a CHR is introduced.**
- Targeted adverts for adapted units, those restricted under a local letting plan, rural letting scheme or s106 agreement.
- Applicants will be limited to 3 offers.
- Ensuring a balance between homeless applicants and other priority need with local demand in Band 1.

5.2.3 Advertising the Property

Properties identified for choice-based lettings are advertised online on the Allocation Scheme System for a period of 7 days from Wednesday to Tuesday. This is called an advert cycle. The 7th day is the closing date.

Alternative housing options such as private rented, shared ownership properties and other solutions do not have an advert cycle. They remain on the website at all times.

5.2.4 Rent Regimes

This should be clear in the advert and/or offer letter where it is a direct let. There may be 3 types:

Social Rented: Properties built before the affordable rent programme; the rent is calculated as a formula rent under the rent standard. Tenure types will be Starter and Assured tenancies.

Affordable Rented: Properties built under the affordable rent programme; the rent can be up to 80% of the local market rent value. Tenure types will be Starter and Affordable Assured with some of them being fixed term tenancies of between 3 and 5 years. This is determined by the partner landlord's tenancy policy.

Fair Rented: These are generally for tenancies issued prior to 1989 or stock transfer properties. They only apply to social landlord transfers currently on a secure or preserved secure tenancy. The rent is registered every 2 years with the Rent Officer Service. Tenants on secure tenancies may not be able to transfer their tenancy to an Affordable Rented property unless the advert specifically states you can. If you bid for it and accept it, you will be expected to surrender your secure tenancy and sign up on an affordable assured tenancy. This will be discussed with you at the time and you may wish to seek independent advice.

5.2.5 Property Descriptions

The advert or direct offer letter should contain a clear description of the property.

- a) Photographs
- b) Type (house, flat)
- c) Tenure (social rented, private rented, shared ownership)
- d) Number and max occupancy of bedrooms
- e) Location
- f) Level of accessibility for those with mobility issues/wheelchair users
- g) Services provided (sheltered housing scheme manager, caretaker)
- h) Heating type
- i) Age restrictions
- j) Whether pets are allowed
- k) Availability of outside space (garden etc.) and parking
- l) Rent and service charges (split weekly/monthly) and rent regime. **See 5.2.4**
- m) Special information (location of bus routes/ other amenities)
- n) Property size category (known as the PPGC code)
- o) Targeted advert for transfers only or if a local letting provision only
- p) Permission to under occupy.

5.2.6 Local Letting Provision

Sometimes local lettings agreements are agreed with South Norfolk Council either for a new development or existing properties. The table below outlines the types of local letting provision operating within this Allocations Scheme. These are monitored annually and measured for their impact on the main Allocations Scheme.

Local Letting Provision	Description
Local Letting Policies	<p>Local Lettings Policies Section 167(2E) of the 1996 Housing Act enables housing authorities to allocate particular accommodation to people of a particular description, whether or not they fall within the reasonable preference categories.</p> <p>Criteria in addition to the Allocation Scheme is considered when an allocation is made to a particular estate or community. They are used to achieve a wide variety of housing management and other housing policy objectives, and are usually developed where there is a wish to alter the balance of the community or ensure a balanced community at the stage where a new development is let.</p> <p>The partner landlord will gain approval from their own Board and the Allocations Scheme Panel. The planning department of the Councils will also be involved where the policy is being applied to a new development.</p> <p>The reason for its proposed introduction must be set out as follows:</p> <ul style="list-style-type: none"> ▪ the particular issue that is affecting the community that requires the Local Lettings Policy ▪ the area it would cover including the number and types of properties ▪ how long the policy will be in place ▪ what they hope to achieve by its introduction ▪ what the policy contains ▪ the impact on the main Allocations Scheme
Rural Lettings Schemes	<p>In areas which are officially defined as either villages or rural parish the rural lettings scheme may apply. The allocation will be made to the applicant with the highest priority, where there is equal priority, the allocation will be given to the applicant that demonstrates the greatest connection to the community which is assessed by:</p> <ul style="list-style-type: none"> ▪ how long the applicant has resided in the community ▪ how long the applicant has been employment in the community ▪ how long the applicant has been involved in voluntary work within the community
Section 106 Agreements	<p>Section 106 Agreement Letting Scheme Properties developed on sites that incorporate a Section 1064 agreement determining the allocation of housing on that site will be let in accordance with the terms of the agreement. Such agreements</p>

	<p>have been developed to ensure that secure mechanisms are in place to restrict the occupancy of the dwelling both on first occupation and in perpetuity to those who have a local community need for an affordable dwelling.</p> <p>The partner landlord will gain approval from their own Board, the Councils planning department and the Allocation Scheme Panel.</p>
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5.2.7 Hard to Lets

Some properties are harder to let because they are less attractive to applicants who will either refuse them or fail to bid for them. This could be a number of reasons including, location, floor level, age, condition. South Norfolk Council will consult with the landlord and if it is deemed hard to let, then it may be made available to a wider pool of people on the Housing Register. This would include households that can afford to under occupy by one bedroom. If after 2 advert cycles this is still not let, it will be offered to Broadland District Council. If the property is still not let, it may be offered to another Local Authority with permission from the partner landlord. South Norfolk Council must ensure that it has been let to eligible applicants in priority need.

5.2.8 Sensitive Lets

Sensitive lets are rare and likely to be due to two main reasons:

1. Where we have to be careful with the applicant or a member of their household due a traumatic incident. We need to consider the location of the property or even the type of the property to ensure that the accommodation would not expose them to undue stress. In these cases, we will undertake a sensitive let as a direct offer.
2. Where the partner landlord informs us that a property has a management history which requires the careful selection of the next tenant to ensure harmony in the area where it is located. In these cases, we may have a targeted advert for transfers only as a choice-based letting or we will make a direct offer.

In both cases the priority order and time waited will be preserved. We will however be using additional selection criteria to manage the letting sensitively. Both types of cases must be presented to Allocations Scheme Panel for approval. If it is the applicant and their identity must be protected then, only the case specifics will be heard by the Panel.

5.2.9 Housing with Support or Extra Care

Some accommodation is designed specifically for older people or people who need a specific type of care or support. There is a charge in addition to the rent. The older people schemes are designed for those with a minimum age of 55 or 60. They may also have extra care provision. If the property is advertised as choice-based letting, the advert will be clear who can apply. Some schemes are not advertised and are subject to a direct let.

In exceptional circumstances, younger people may be considered for older people schemes, if they require support, and other types of accommodation are not suitable. This would be achieved through a direct let.

In both instances, the partner landlord will undertake a need and risk assessment of the applicant to ensure they meet the eligibility for the scheme.

5.3 Expressions of Interest



5.3.1 Bidding for Properties

Once an applicant has been assessed and provided there are no restrictions such as a reduced preference or they are not ready to move, they will be made active to bid and issued a choice based lettings scheme guide to help them use the system. This enables them to apply for an advertised property which meets the size and type they are permitted. They can bid for up to two properties a week, but they must do so before the closing date to be considered. The expression of interest is by bidding.

Bidding can be undertaken by:

- Phone
- Text
- Website

5.3.2 Assisted Bidding and Auto Bidding

Where someone is vulnerable or unable to bid for themselves and has no one to do it for them, we will allow you to register for assisted bidding. You provide us with your choices, and we do it for you. They placed using a function we call auto bidding. If you wish to change your choices, you need to contact us. We may need to reassess your application if your new choices do not match with your current priority need. The auto bids are like advance expressions of interest. You will need to be sure of choices so that the auto bidding system can bid for the type of home you are willing to accept.

5.3.3 Grouped Bids

In certain circumstances, properties that are advertised may be grouped into one single advertisement. This will include advertisements for new build properties and those properties made available following regeneration schemes, where properties will be grouped by property type and size. Schemes under 5 units will not be subjected to grouped bids. Where there are grouped advertisements, applicants who place one bid will be considered for all properties within the group.

5.3.4 Retrospective Bids

A retrospective bid request is a bid placed once the bidding cycle is closed. It is usually a request from an applicant, or their authorised representative, to include a new bid or withdraw an existing bid and replace it with another. It will only be considered if there was period during the bidding cycle where the bidding facility was unavailable for 30 minutes or more and the Housing and Benefits Service can confirm this. The Council places alerts on the system when the system is down and

invites retrospective bids where necessary. If allowed, a retrospective bid can only be placed by the Council no later the close of business on the day after the closing date. By placing such a bid, the applicant is not guaranteed an offer. The applicant will need to contact the service by phone or come in person. The Council will alert the partner landlord who owns the property, the shortlist will be suspended whilst this bid is processed and then the shortlist will be run again.

5.3.5 Shortlisting

When a closing date is reached for a choice based letting, the applicants who bid for the property will be shortlisted within 3 working days.

The shortlist will use the following parameters to prioritise:

- South Norfolk Council local connection **See 3.2**
- Local letting provision **See 5.2.6**
- Targeted advert criteria **See 5.2.5**
- Reduced preference applicants who are inactive to bid should not appear on the list. **See 4.4.3**
- Bedsize and property type allowed **See 4.4.14**
- Adapted unit.

The successful applicant will be verified if they are to be selected for the property and it has not been done within the last month or the applicant shows an outstanding issue. The property must be deemed suitable to the needs of the applicant and there must be agreement by the partner landlord.

If an applicant has to be bypassed because there are circumstances which mean they do not suit the property or cannot be selected, a bypass reason must be put in the system. This is mandatory and ensures the decisions are fair and transparent. This will be preserved on the applicants offer history.

Typical bypass reasons are:

- Bid was placed before a change of circumstance was requested
- Failed tenancy reference – arrears
- Failed tenancy reference – ASB
- Failed tenancy reference – other
- Unable to afford
- Matching incorrect – review application
- Unable to contact using 2 different methods and making 3 attempts

If a shortlist is exhausted and it is not possible to select an applicant, the list may be run again to check there are no further applicants who have been missed.

Where it has not been possible to select an applicant, a matching exercise will be undertaken on applicants who are inactive to bid. If one of them matches, their stabilisation will be reviewed, and risk assessed. If the Council feels they could now sustain their tenancy and the partner landlord agrees; then they will be selected for a direct offer subject to conditions around tenancy sustainment.

5.3.6 Direct Offer

Where a property or an applicant has been identified for a direct offer **See 5.2.1** a matching exercise will be undertaken to ensure the property is suitable for the

applicant. It uses similar criteria to the shortlisting process undertaken for choice-based lettings. Officers will undertake the matching exercise in the Housing Register.

Once matched a list is generated. Bypass reasons are mandatory on a match list in the same way as they are for a shortlist. The successful applicant will be discussed with the partner landlord and following their agreement, an offer will be made. The expression of interest is by the applicant responding favourably to the offer.

5.4 Letting



5.4.1 Offer of Accommodation

All applicants selected for a property will receive a formal offer letter which serves two purposes:

- preserves the offer history whether they accept or refuse the property
- meets legal compliance

South Norfolk Council will:

Formally notify the applicant they have been selected for a property either by shortlisting as a choice based letting or matching as a direct let. This will usually be accompanied with direct contact by email or phone. It should not completely replace it.

Partner Landlord will:

Formally offer the applicant the property; even if this has to be done retrospectively because of the quick turnaround of voids.

All formal contact around selection and offer is subject to the following:

- a) Applicants will usually be contacted within 3 working days of the closing date.
- b) It is the applicant's responsibility to keep the Council of current contact details.
- c) Applicants have up to two working days to respond.
- d) If they fail to contact or to express an interest if they do, the Council will go to the next applicant on the shortlist.
- e) Partner landlords will have their lettings procedures which will usually include an affordability check, a suitability assessment and a needs and risk assessment if they are providing specialist housing. Pitches for gypsies and travellers may be subject to further assessments. **See 4.4.11**
- f) The landlord has the final decision on whether they will accept the applicant for the property, however they are required to contact the Council before rejecting them to see if there are more measures that can be put in place to make the offer more suitable.

- g) Selection and an offer may be withdrawn if it is found that the information supplied by the applicant was either false or incorrect or they have had a change in circumstances.
- h) All offers are subject to viewing.
- i) Once the formal offer is made the status of the applicant on the Housing Register will show as 'Under Offer'.

5.4.2 Limited Offers

South Norfolk Council has a limited offer policy:

- homeless single offer; penalty discharge of duty and no reapplication unless circumstances change
- management transfers unlimited; no penalty required
- all other 3 offers only; penalty suspension for 6 months which could have the added requirement of a reapplication and new application date. This drops them down the time waited queue.
- An offer is deemed to be reasonable if matches area, bedroom allocation, floor level, property type for household, criteria for medical award, takes into account young children, and is an average standard or repair or more. Where an offer is agreed as not reasonable it will be withdrawn and will not count as one of the limited offers.

5.4.3 Viewings

There is no obligation on the applicant to take a property unseen. The partner landlord will contact the applicant to arrange a viewing. They will send an Officer to attend the viewing with the applicant. Following the viewing the applicant will be expected to either accept or refuse the property. If they refuse, they will be referred back to the Council and another applicant known as a nomination will be requested. If the partner landlord pulled the shortlist themselves, they will go to the next suitable applicant on the shortlist and repeat the offer process until the property is accepted. If it proves hard to let. **See 5.2.7**

There are three types of viewing:

Single Viewing:

One applicant views the property at any one time. This will be used primarily for sensitive lets.

Multiple Viewing:

More than one applicant will view at the same time. All the applicants will be verified. Only the top applicant if offered formally. The remainder are given viewing letters only. If the top one refuses, the next one is formally offered etc. Any who failed to get a formal offer will be withdrawn. There are no penalties for having it withdrawn in this situation.

Accompanied Viewing:

This may be single or multiple. The applicant is accompanied by either an advocate, a Support Worker, a Homeless Officer or an Occupational Therapist. It is usually offered where the applicant is likely to need extra assistance

around the viewing in respect of vulnerability, mobility need, and navigation around their rights under the homeless duty.

5.4.4 Resulting the Offer

Recording the outcome of the viewing/offer is called resulting the offer. It is mandatory in order to preserve the offer history and property history. It also serves to allow management of the Councils and partner landlord partnership arrangement.

The partner landlord will obtain a formal record of the outcome. The table below outlines each type of result and the ensuing action.

Outcome	Action Required	Applicant Status
Withdrawn - multiple viewing	<ul style="list-style-type: none"> No penalty Automatic system function 	<ul style="list-style-type: none"> Offer history preserved
Withdrawn - other	<ul style="list-style-type: none"> Partner landlord refuses applicant Councils withdraw Housing register review initiated. See 6.3.1 	<ul style="list-style-type: none"> Offer history preserved Housing Register review with review period May require an investigation. Under review and inactive to bid allow a review and/or investigation to take place

Accepted	<ul style="list-style-type: none"> ▪ Acceptance recorded ▪ Provisional tenancy start dated recorded ▪ Monitored for sign up 	<ul style="list-style-type: none"> ▪ Offer history preserved ▪ Status changes to accepted ▪ Inactive to bid
Refused – homeless	<ul style="list-style-type: none"> ▪ Refusal recorded ▪ Limited Offer maintenance See 5.4.2 ▪ Statutory review initiated See 6.3.2 	<ul style="list-style-type: none"> ▪ Offer history preserved ▪ Statutory review with a review period ▪ Under statutory review and inactive to bid ▪ The review will pick up changes in circumstances and penalties as a result of a single offer.
Refused – other	<ul style="list-style-type: none"> ▪ Refusal recorded ▪ Limited Offer maintenance See 5.4.2 ▪ Exceed limited offer penalty evoked ▪ Change of circumstances. 	<ul style="list-style-type: none"> ▪ Offer history preserved ▪ Change of circumstance prompts a Housing Register review with review period ▪ Number of offers remaining ▪ Penalty action if limited offers exceeded

5.4.5 Publicising Lettings

Our performance around lettings is publicised:

- **Annually;**
 - **Quarterly;**
 - **Weekly;**
- will show:

on the property page of the choice-based lettings system we

- ❖ Areas where properties were let
- ❖ Number of bids each property had
- ❖ Band and effective band date of the successful applicant came from for each property
- ❖ No personal information will be disclosed

5.5 Tenancy Sustainment



Our Accommodation Pathway Model ensures that anyone who approaches us for housing, or a housing related matter will be sent through the key stages of:

- Marketplace
- Prevention
- Stabilisation
- Resolution

The Allocations Scheme is designed to sort our longer-term solutions for people, and this means making it possible for them to stay in the home of their choice and one that meets their need. We therefore ensure that at each of the key stages of the model we will do everything practically possible to promote tenancy sustainment.

The table below describes the tenancy sustainment measures that are/could be adopted in order to achieve tenancy sustainment.

Marketplace	<ul style="list-style-type: none">▪ Accommodation Option Plan is designed for the household▪ Affordability and household size will be considered▪ Specific health needs will be considered▪ Age will be considered▪ Support and care needs will be considered▪ Previous tenant history will be considered▪ Professional reports will be considered
Prevention	<ul style="list-style-type: none">▪ Each case presenting in high priority need will be assessed to see if there is prevention solution with the provider of their existing home▪ Support and care assessment will be undertaken to see if more or different is needed▪ Living skills will be promoted to allow tenancy management learning▪ Families will be prioritised alongside single people if they are reaching crisis point▪ Referring agents will be required to undertake a hands-on approach▪ Safe Surrender Agreements put in place before a failing tenancy is surrendered. See 3.6

Stabilisation	<ul style="list-style-type: none"> ▪ Discharge of duty will only take place if the applicant is completely unwilling to engage in the previous key stages of the model ▪ All temporary solutions will be quantified and qualified in order to set a tenancy sustainment standard and promote learning ▪ People who are not ready to live independently will undertake a period of stabilisation to see if this will remedy the situation. They will not be able to bid for social housing during this time. ▪ Support and skills will be introduced to promote learning and redressing of any negative tenancy behaviour ▪ Reduced preference cases will be subject to a mandatory period of stabilisation to ensure they address the behaviour which resulted in the assignment of preference assignment. They will be unable to bid for social housing and may not qualify for other housing options either as private landlords will have similar requirements to partner landlords. ▪ The existence of a Safe Surrender Agreements prior to tenancy failure, shows the applicant is prepared to take responsibility and negotiate stability prior to surrendering the tenancy. It allows the Councils to assess their application with this in mind and will likely allow them to qualify without the need of reduced preference. This in turn enables the current priority need, to be addressed much earlier and factored into the Accommodations Options Plan. See 3.6
Resolution	<ul style="list-style-type: none"> ▪ All types of housing solutions will be considered with recourse to tenancy sustainment implications ▪ Partner landlord and other housing providers within the partnership will be required to work with the Council to provide a hand holding period for applicants who have support and care identified and require longer to settle in. During this time, their application will remain open but suspended subject to a satisfactory assessment with input from the applicant themselves and any agencies involved. If the assessment is successful and they are managing their tenancy effectively, their application will be closed retrospectively. The tenancy start date will be used as the closure date to ensure performance is not penalised. ▪ Applicants being referred to the rent deposit schemes, and other such private housing options may experience a longer period of stabilisation as private landlords are less likely to be partners. ▪ The partner landlords usually have a tenancy support or sustainment service which will support the new tenancy and this should be flagged as a requirement for all applicants who have undergone a mandatory stabilisation period and for those who are already identified with support and care provision. ▪ The Council and the partner landlords will have the final decision in whether to accept a level of risk in relation to tenancy sustainment with an applicant. ▪ The Council and the partner landlords will seek to provide a guarantee where practically possible with applicants which meet the threshold of high risk.

5.6 Decisions

The administration of the Allocations Scheme requires South Norfolk Council to make key decisions in relation to an application to join the Housing Register.

- a) The decision that confirms or denies your eligibility to join. **See Part 3**
- b) The decision that confirms or denies your qualification. **See Part 4**
- c) The decision that awards your priority housing need. **See Part 4**
- d) The decision to reassess your application as reduced preference. **See Part 3**
- e) The decision to reassess your priority housing need following a change of circumstance. **See Part 4**
- f) The decision to cancel your application. **See Part 4**
- g) The decision to deny your review. **See Part 6**
- h) The decision that deems your refusal of a property as unreasonable. **See part 5**
- i) The decisions to refuse a duty under the homeless legislation. **See Part 4**

If you disagree with a decision in relation to your application, you have the right to request a review. In order to ensure you are heard by the correct officer, it is important to understand the following:

- ❖ If you provide evidence that you did not provide for your assessment. **This is a change in circumstance. See 4.7**
- ❖ If you think we failed to follow our policy or stated process, or you simply feel we could have handled your application better. **This is a complaint. See 6.2**
- ❖ If you disagree with a homeless decision under Part 7 of the legislation. **This is a statutory right of review.**
- ❖ If you disagree with your priority award under Part 6 of the legislation. **This is a statutory right of review.**
- ❖ If you have completed a period of stabilisation on reduced preference. **This is a housing register review.**
- ❖ If you take legal action and the judge agrees with you and directs the Councils accordingly. **This is a judicial review**
- ❖ If you are unsatisfied with the outcome of your right of review. **You may appeal.**

5.7 Complaints

If an applicant is dissatisfied with any aspect of the management of their application, other than where a review can be made, they should follow the Council's published complaints procedure, available on the Council's website at **URL to be supplied** or on request.

If a complainant is not satisfied with the action the Council takes, they can send a written complaint to the Local Government Ombudsman who can be contacted at:

Local Government Ombudsman
PO Box 4771
Coventry CV4 0EH
Tel: 0300 061 0614
Website: www.lgo.org.uk

If an applicant wishes to make a complaint against a partner landlord, they should contact:

Housing Ombudsman Service
Exchange Tower
Harbour Exchange Square
London
Tel: 0300 111 3000
E mail: info@housing-ombudsman.org.uk

5.8 Reviews

There are several types of reviews:

Housing Register Review	This review is initiated by the Council in order to maintain applications on the housing register.
Statutory Right of Review	This is the right of review requested by the applicants because of a decision made in relation to their application.
Judicial Review	This a review undertaken by the Courts because something has come to light in a case where legal action has been taken.

5.8.1 Housing Register Review

South Norfolk Council undertakes the current Housing Register reviews:

- Band 1 Reviews:** These applications will be reviewed every 4 weeks. This ties in with homeless prevention and relief duties. These are critical cases and should not retain the highest level of priority indefinitely as factors in relation their circumstances usually change rapidly.
- All other bands:** These applications will be reviewed every 12 months. Good practice dictates these are undertaken annually in order to maintain the accuracy of the Housing Register.
- Spontaneous Reviews:** These arise from time to time as a result of being alerted either by an allocation or because we have been contacted by another agency in relation to the application.
- Reassessment Reviews:** Applicants on reduced preference who have completed a period of stabilisation in relation to their behaviour will have a review when it ends in order to assess their ability to sustain a tenancy. If they have failed, they may no longer qualify. If they succeed, they will qualify, and action will be taken to allow them to bid in the awarded band.

In order to undertake Housing Register reviews, we will:

- a) Set the correct review period on their initial assessment and all subsequent reassessments.
- b) Our Allocations Scheme will flag the application on its review date.
- c) This will be assigned to an Officer to review.
- d) They will write to the applicant or contact them by their preferred method to confirm if their circumstances remain the same.
- e) The applicant has 21 days to respond.
- f) If they fail to respond their application is cancelled.
- g) If they confirm the circumstances remain the same, the correct review period is reset.
- h) If their circumstances have changed, they will be asked to provide the evidence and their application is reassessed as a change in circumstances. Their new review period is set following the reassessment.
- i) With reassessment reviews for reduced preference applicants, a tenant reference will be obtained from their current landlord in relation to their behaviour during their stabilisation period. References from other agencies may also be obtained if the reason for their reduced preference is not tenancy related. If the reference is favourable, they will be made active to bid and this will be confirmed in writing. If they have failed their reduced preference will be removed and they will no longer qualify to be on the Housing Register and their application will be cancelled.

5.8.2 Statutory Right of Review

If you are not satisfied with a decision you may request a statutory right of review which would cover:

- The information we used to make the decision
- Whether the information was fully considered
- The reason for the decision
- The decision itself.

The following steps should take place for a Statutory Right of Review:

- a) The applicant or their representative should make the request within 21 days of the decision preferably in writing. The request should state why they disagree with the decision and if necessary, provide the necessary information they felt should have been considered.
- b) The request will be logged and acknowledged. It will state how long the review will take. The reviews will be carried out within 28 days of the request being received. If more time is required, an extension will be requested with the applicant.
- c) The review will be assigned to a senior Officer who did not make the original decision.
- d) If the information was not previously provided for the original decision, the review will be closed, and the applicant will be advised in writing that this now being treated as a change in circumstances.
- e) If the senior Officer feels that the applicant is correct or partially correct the outcome will be to uphold the review and the application will be reassessed.
- f) If the senior Officer feels the original decision is correct, they will deny the review and the original decision stands.
- g) The review outcomes will be recorded.
- h) The applicant will be advised in writing within 14 days of the decision.
- i) If the review needs more time, the applicant will be advised in writing that an extension is required.

- j) If the applicant is still not satisfied, they may appeal the decision. **See 6.4**

5.8.3 Judicial Review

Where an individual or organisation feels the Council's Allocations Scheme is unfairly prejudicial or their case has been dealt with a prejudicial manner, they may wish to take legal action. They should seek independent advice before doing so.

The case will be heard in Court before a judge. Both sides will appoint counsel. If the judge decides the case against the Council to be partly or fully substantiated, the Council will be formally advised of the verdict and will need to respond through their counsel. The result may be an alteration to the Allocations Scheme and/or a reassessment of the applicant's case. These are termed judicial reviews.

5.9 Appeals

If you are not satisfied with the outcome of the statutory right of review, you may request an appeal. Appeals are heard by the Allocations Scheme Panel. Both sides get the chance to represent their point of view before the panel. The terms of reference for the Allocations Scheme Panel are detailed in **Appendix 3**

The following steps should take place for an Appeal:

- a) The applicant or their representative should make the request within 14 days of the review decision preferably in writing. The request should state why they disagree with the decision and if necessary, provide the necessary information they felt should have been considered. They should indicate whether they want an oral hearing i.e. appear before the Panel or have it heard by written submission.
- b) The request will be logged and acknowledged.
- c) The appeal will be assigned to a senior Officer who did not make any of the original decisions. Their role is to collate the papers and service the Panel.
- d) If the information was not previously provided for the original decision, the appeal will be closed, and the applicant will be advised in writing that this now being treated as a change in circumstances.
- e) The Officer will convene the Panel within 14 days of receiving the request. In exceptional situations a longer period may be agreed.
- f) Only 3 representatives of the Allocation Scheme Panel are needed to hear an appeal.
- g) The Panel will meet. In attendance will be the senior Officer. If an oral hearing was requested the applicant or their representative and a Council Officer from the Housing and Benefits Service will also attend.
- h) The Panel may feel that the applicant is correct or partially correct the outcome will be to uphold the appeal and the application will be reassessed.
- i) The Panel may feel that the original decision is correct they will deny the appeal and the original decision stands.
- j) The appeal outcomes will be recorded.
- k) The applicant will be advised in writing within 14 days of the Panel decision.
- l) If the applicant is still not satisfied, they may contact the ombudsman. **See 6.2.** Alternatively, they may seek independent advice.

Appendix 1: Lettings outside of the Allocation Scheme

Lettings where an allocation takes place which a tenancy or licence is created that are outside of the South Norfolk Council Allocations Scheme include:

- a) **Introductory or probationary tenancies:** Where an introductory/probationary tenancy becomes a secure or assured tenancy
- b) **Family Intervention Tenancies:** Introduced by the Housing and Regeneration Act 2008, Family Intervention Tenancies are a form of residential tenancy without security of tenure. They may be offered by either a local housing authority or a registered provider to anyone who is a tenant of a secure (or assured) tenancy subject to a possession order on the grounds of anti-social Behaviour or domestic abuse or anyone who (if they had a secure or assured tenancy) could have had such a possession order made against them.
- c) **Succession:** Under S89 of the Housing Act 1985 (secure tenancies), under S133 (2) of the Housing Act 1996 (introductory tenancies) or under S90 of the Housing Act 1985 (fixed term tenancies).
- d) **Non-Secure tenancies or temporary accommodation:** Any accommodation that is provided to meet an interim duty under Part VII of the Housing Act 1996.
- e) **Temporary decants:** Secure or Introductory tenants of a local authority or assured or assured shorthold tenants of Registered Providers who need to be moved temporarily whilst major work is carried out on their home.
- f) **Demoted tenancies:** Following a successful application for a demotion order under sections 14 and 15 of the Anti-Social Behaviour Act 2003.
- g) **Mutual exchanges:** Between existing tenants under S92 of the Housing Act 1985 or under S158 of the Localism Act 2011.
- h) **Assignment:** To a person who would be qualified to succeed the tenant under S92 of the Housing Act 1985 (secure tenancies) or S134 Housing Act 1996 (introductory tenancies).
- i) **Conversion of an introductory tenancy:** to a secure tenancy under S125 Housing Act 1996).
- j) **Transfers of secure or introductory tenancies by a court order:** Made under certain provisions contained within matrimonial, family, children, and partnership legislation.
- k) **Land Compensation Act:** Allocation to a person entitled to rehousing under section 39 of the Land Compensation Act 1973.
- l) **Re - Purchased Homes:** Allocation to a person whose home is repurchased under sections 554 or 555 of the Housing Act 1985 (defective dwellings).
- m) **Transfers:** Within the same partner landlord (registered provider) stock, where the unit has not been made available to the Councils under current partner arrangements.

Appendix 2: Allocation by Bedsize

A bedroom is defined under the legislation and regulation as:



The Room Standard: The room standard is contravened when the number of persons sleeping in a dwelling and the number of rooms available as sleeping accommodation is such that two persons of opposite sexes who are not living together as partners must sleep in the same room. Children under the age of ten excluded from this definition. A room is available as sleeping accommodation if it is of a type normally used in the locality either as a bedroom or as a living room.

The Space Standard: The space standard is contravened when the number of persons sleeping in a dwelling is in excess of the permitted number, having regard to the number and floor area of the rooms of the dwelling available as sleeping accommodation. A child under the age of 1 year and a child aged 1 year or over but under ten shall be reckoned as one-half of a unit. A room is available as sleeping accommodation if it is of a type normally used in the locality either as a living room or as a bedroom.






















No account shall be taken for the purposes of either standard of a room having a floor area of less than 50 square feet.

Floor Area of Room (square feet)	Number of Persons
110 or more	2
90 or more but less than 110	1.5
70 or more but less than 90	1
50 or more but less than 70	0.5

This table below provides guidance on the size of home that different types of household can bid for on the South Norfolk Council Choice Based Lettings website. Further information may be provided by the partner landlord on the website when a property is advertised. Use the key below to explain the symbols.

Key	
	Number of bedrooms allowed for this household type
	Number of bedrooms allowed for this household type, subject to the ages and sex of the children: <ul style="list-style-type: none">Two children under the age of 10 are usually expected to share a bedroomTwo children of the same sex are usually expected to share a bedroom until they are 16Once a child is 16 a separate bedroom is allowed
D	The Council will award the extra bedroom as a discretionary allowance, but it is subject to affordability and the ability to sustain their tenancy even if they are on benefits and subject to the bedroom tax.

*	Some partner landlords may only allow households with children to bid on houses
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Household	Bedsit	1 bed	2 bed	3 bed	4 bed	5+bed
Single person			D	D		
2 Adults – Couple (inc.: same sex couples)			D	D		
2 Adults			 *	D		
1 Adult plus 1 Child				D		
1 Adult plus 2 Children						
1 Adult plus 3 Children						
1 Adult plus 4 or more Children						
Couple plus 1 Child				D		
Couple plus 2 Children						
Couple plus 3 Children						
Couple plus 4 or more Children						

Note: Households with access to children who do not live with them as part of the permanent household will only be able to bid for the property size they have been allocated as part of their priority award. **See 4.3.2 and 4.4.14**

Appendix 3: Terms of Reference: Allocations Scheme Panel

The role of the Allocations Scheme Panel is to:

- Approve a direct let for an applicant does not meet the criteria list in 5.2.1
- Approve a sensitive let requested by the Council in relation to an application or a partner landlord in relation to a property. Simple cases will be heard by 3 panel members via an online platform and the decision ratified at the next full panel meeting. Complex cases or cases where the decision will have a negative impact on the household will be heard by the full panel.
- Consider and approval Local Lettings Policies partner landlords may wish to introduce.
- Hear appeals where an applicant has exercised their right to a review, remains dissatisfied with the outcome and wishes to take it further.

The panel members are:

Housing and Benefits Managers (joint administrator responsibility)

Senior Officer, Saffron Housing Trust

Senior Officer, Clarion (Circle Wherry) Housing

Senior Officer, Cotman Housing Association

Senior Officer, Orbit Housing Association

Senior Officer, Flagship Housing Group

Senior Officer, Broadland Housing Association

A Panel is quorate with 3 or more members

A chair will be elected for appeal panels.

The Panel will process requests and appeals by ensuring the following:

- a) A member may present a request from their own organisation, but they must excuse themselves from the decision as a clear conflict of interest.
- b) A member can be part of the panel to hear an appeal if they were involved in the original decision.
- c) Requests and appeals must be submitted to South Norfolk Council by email, however requests can also be made in writing or by telephone where appropriate.
email address to be supplied
- d) Submissions must be in the format of the proforma which can be download from the website. Housing Solutions Officers will support applicants to submit a proforma by the most appropriate means. **URL to be supplied**
- e) Panel members should have the papers for a request or appeal at least 5 working days prior to the meeting.
- f) The Panel must give due consideration and fair treatment in relation to:
 - The decision to have their appeal heard orally or by written submission
 - The appellant to be accompanied by one person to advocate on their behalf
 - Time for all parties to have sight of the papers in relation to a request or appeal
 - Necessary time for an investigation where necessary
 - Request for adjournments from the applicant if it is deemed reasonable
- g) Business discussed by the panel is confidential to panel members only. Named parties may request a copy of the decision. These will only be released at the discretion of the panel and with personal data other than the named parties redacted or removed.
- h) Approval requires a majority vote and the meeting to be quorate.
- i) The chair will be responsible for conveying the decision of a panel.
- j) The Panel decision is final.

THE VISION FOR A BEST IN CLASS HOUSING OFFER AND DRAFT ALLOCATIONS POLICY

Addendum to the vision for a best in class housing offer and draft allocation policy – following questions at informal briefings by Councillors it felt useful to provide a more detailed briefing to better inform the considerations of the committee

1 Background

- 1.1 Currently the system used by South Norfolk Council is Arbitas. This system has been in place for nine years in its current form. It has received during that time no significant upgrades beyond those required to allow for change in legislation. The current version of the system is 7.1 and the current market offer is 10. Whether or not a new policy is implemented, an upgrade of the system is required to allow continuous improvement of the service. To allow the development of a best in class housing model as described, investment in the system is a necessary requirement.
- 1.2 Significant market testing has been undertaken to allow officers to understand the best quality and produce of product available for the council to meet its intended operating model.
- 1.3 Work is already underway to upgrade the housing system. Costs are outlined below and show that implementation will yield a saving over a four-year period of time against current costs. Capital costs are allocated against existing capital project budgets for 20/21. It is likely capital costs can be absorbed into this budget, but councillors should note that spend but will place an additional budget pressure.

2. COSTS AND GOVERNANCE

- 2.1 The overall cost for the IT system to replace both South Norfolk and Broadland Council current systems is as follows
- 2.2 The initial cost will be £86,769 which will come out of capital expenditure. This works out as the following (55/45% split):

1.1.1 South Norfolk Council	£47,722
1.1.2 Broadland District Council	£39,046
- 2.3 This will be unbudgeted spend this financial year, members are asked to endorse this expense to enable longer term savings.
- 2.4 The annual support maintenance of the system will be £17,353. This works out as the following (55/45% split):

2.4.1 South Norfolk Council	£9,543
2.4.2 Broadland District Council	£7,808

Savings

- 2.5 By procuring a joint system between the two Councils to enable a best in class offer, we will be able to maximise the benefit of two Councils, one team. The table below compares the cost of the existing system compared to proposed system and the savings this will bring.

- 2.6 The purchase of the new system not only provides the support to the best in class approach but will also yield a saving over four years.

	Proposed system		Current system		Savings 4-year difference
	Cost	Rolling total	Current budgeted yearly costs	Rolling total	
Year 0	47,722	47,722	0	0	
Year 1	9,764	57,487	22,500	22,500	
Year 2	9,764	67,251	22,500	45,000	
Year 3	9,764	77,015	22,500	67,500	
Year 4	9,764	86,780	22,500	90,000	3,219

3. Conclusion

To note the costs and work as part of the main report to establish fit for purpose systems to enable a best in class housing model and new allocations policy.



Equalities and Communities Impact Assessment

Name of Officer/s completing assessment: Victoria Parsons

Date of Assessment 20th October 2020

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

Broadland District Council Allocations Scheme South Norfolk Council Allocations Scheme

The Allocations Schemes were developed jointly by Broadland and South Norfolk Councils as part of the Best in Class Housing Offer. Two Allocations Scheme documents have been created to facilitate individual Council branding however, the content of the schemes are the same. With this in mind and in recognition that the schemes will be administered by a single Officer team, a joint EqCIA has been prepared.

The Allocations Scheme aims to:

- Improve the means by which local people gain access to social rented housing through a system that allows choice and is fair, transparent and accountable.
- Ensures the lettings service embraces equality and diversity by being open and fully accessible to all individuals and to provide support to customers where needed
- Meets the legal obligation of the council in respect of giving appropriate priority to customers with a 'reasonable preference' category
- Makes the best use of housing stock, including areas of low demand and 'hard to let' properties.
- Assists customers with understanding their housing options
- Increases opportunities for tenant mobility
- Formalises partner working arrangements

We also acknowledge that COVID-19 has exacerbated and widened inequalities, particularly amongst:

- People with a Black, Asian or Minority Ethnicity
- People living in poverty, on low incomes or just finishing their education
- People working in industries particularly affected by COVID-19, for example, leisure, retail and hospitality.
- Those in unaffordable, insecure or unsuitable housing,
- People experiencing Domestic Abuse
- People experiencing social exclusion and isolation
- Those with health conditions including mental health

The Allocations Scheme was created both before and during the outbreak of COVID-19 and is designed to be a timely response to the ongoing impacts that will be felt in relation to the allocation of social housing. It was co-produced by the housing offer project officer team, consultants Campbell Tickell and a joint member working group. In addition, the scheme has been checked for legal compliance by NPLaw.

A public and stakeholder consultation is taking place 9th-23rd October with respondents specifically asked to feedback on any potential equalities implications. Responses will be incorporated into this EqCIA following completion of the consultation process.

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	✓		

4. 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

The scheme sets out the process by which available social housing is allocated to households on the housing list and for Broadland and South Norfolk Council's a Hybrid system has been proposed. For the majority of applicants this would provide the opportunity to have choice in bidding for available properties through an online system. This system provides transparency and expectation management in that applicants will see what properties are available, in what location and what they are likely to be successful in bidding for.

For those who need additional support, for example, those with a learning disability, health condition including mental health or are vulnerable, assisted bidding can be implemented. In addition, for specific properties Direct Lets will be available in certain circumstances, summarised as applying where:

- There is an urgent rehousing requirement
- Where there has been failure to bid or a number of refusals
- Where the applicant is vulnerable
- For some adapted units.

In addition, where there is a delivery completion of more than five houses on a particular development, a nominations process will take place. Applicants will place a bid on the development and the council will shortlist based on applicants circumstances within the banding criteria (including s106 requirements) and allocate the most suitable properties to each successful individual to make sure those in most need gain access.

In order to increase accessibility and to create a flexible service, the councils will be seeking to implement a wider online offer for the service. However, we also appreciate that an online option may not be appropriate for some, for example, for those with complex cases, those who are unable to use the internet without support and those who are unable to access the internet. To this end, current options for contact, such as phone, letter and face to face (dependant on COVID-19 circumstances) will continue to give a wide range of choices.

The Councils are not proposing to operate a reduced preference band, instead opting to operate a suspension of bidding arrangement. Applicants on a reduced preference band could still be re-housed and this can reduce the incentive to seek support or resolve the behaviours, such as rent arrears or ASB that led to the reduced preference banding. With a suspension of bidding arrangement, applicants would be awarded banding based on their needs but they would be suspended from bidding on any properties until a suitable period of stabilisation has been completed. This could include seeking support for anti-social behaviour or reducing rent arrears. Applicants will be able to work with the Councils Housing & Benefits Advisors, link into organisations within the Help Hubs and wider organisations.

In this way good tenant behaviour is promoted and there is increased likelihood of future sustainable tenancies.

Young and single people, single adult headed households, those on low incomes and those with mental health and complex needs may be impacted by this policy. However, in mitigation the aim is to directly seek to resolve issues which could lead to a future failure of tenancy and re-presentation to the Council. All suspension of bidding cases will be assessed carefully on their circumstances, to ensure that we are not compounding inequality or increasing risk and/or vulnerability for applicants. As with all of the proposals contained within the scheme, regular monitoring and review will need to be undertaken to ensure the process is effective and does not result in a wholly negative impact.

The following provides details of some of the believed impacts in relation to the protected characteristics

Age

It is expected that the scheme will have positive impacts in the following areas.

Young people

Young carers will be treated as a 16+ child and allowed a separate bedroom allocation. This is in recognition of the caring duties they perform in addition to other responsibilities they may have and the benefit of have a safe, relaxing space for these young carers to use.

The councils will accept applications to the list by those who are aged 16-18. However, those under 18 cannot legally hold a tenancy. Where the councils are approached by a 16-18 year old, the Joint Protocol to address the needs of homeless young people in Norfolk will be applied and a joint assessment will be undertaken to identify the best support for that young person, including reunification with family, the application of any duties under the Children Act, accommodation with Children's Services acting as a guarantor, or identification of an alternative guarantor.

Child of tenant arrangements is proposed within the allocations scheme as means with which to rehouse adult children within a household. Specific criteria applies, however this would seek to alleviate overcrowding and allowing the adult child of the household to seek independence and move away from the family home while allowing the family as a whole to remain in their community.

As covered by current legislation, care leavers aged under 21 years are afforded a local connection where they have been looked after by Norfolk County Council for at least 2 years, including some time before they turned 16 or they have been placed in accommodation in Broadland or South Norfolk by another authority for at least 2 years, including some time before they turned 16. However the Councils have taken the decision to extend this local connection to those aged under 25 years old. This brings the offer into line with the statutory duty for Children's Services to offer Personal Advisor support for all care leavers up to the age of 25. In addition, the councils will work with the young person and Children's Services to set up an accommodation plan and to prepare for a tenancy.

In terms of bedroom allocations, the councils are proposing a policy of a separate bedroom for children of the household aged 16+, with children of the opposite sex allocated their own bedroom when they are 10 years or older. This is in line with current calculations for Housing Benefit and Universal Credit in respect of the spare room subsidy and ensures that we do not place applicants in a property that could be unaffordable.

Older people:

The proposed banding criteria gives a Band 2 priority for those who are current tenants seeking to move to a smaller property. This is more likely to impact on older people who may wish to downsize and would allow them to move a property that may be better placed to meet their needs and allows a family home to become available.

Disability

Although the provision of supply is out the scope of the Allocations Scheme, we are highly conscious that access to an accessible property is needed to support applicants with a disability or health condition. Within the Allocations Scheme the Councils will give priority based not only on an assessment of the disability or health condition but also by how the health or quality of life is affected by the applicant's home. From this, the Councils can also make a recommendation that the household has a requirement for a specific property, for example, ground floor, wheelchair accessible, garden space or adapted.

Additionally, we need to ensure that where existing social housing properties that have adaptations become void that they are managed so the adaptations don't have to be removed. This is not a good use of housing stock to meet the needs of applicants on the housing list, nor is it a good use of the council's Disabled Facilities Grant (DFG) funding which may have been used to install the adaptations.

As mentioned above, working with the Landlord to facilitate a direct let through matching an adapted property to an applicant will ensure better use of stock and an appropriate and long-term housing solution for the applicant.

To facilitate further the councils are including within the priority banding a Band 2 allocation for those seeking to move from an adapted property that is no longer needed. Again this ensures that an adapted property becomes available sooner.

As per the bedroom provision for young carers detailed above, where there is an agreed medical need for a Carer and they are not already a permanent part of the household, provision for a bedroom can be given, in addition, where there is a need to accommodate large equipment or where there are serious mobility an additional room can be allocated.

With these measures it is aimed the Allocations Scheme will have a positive impact on applicants with a disability.

Race

The Allocations Scheme aims to have a positive impact for all applicants and we acknowledge that those from Black, Asian and Minority Ethnic (BAME) groups may be disproportionately affected by some aspects of homelessness, for example:

- Black people are disproportionately affected by homelessness with 1 in 23 black households becoming homeless or threatened with homelessness, versus 1 in 83 households from all other ethnicities combined.
- 24% of people making homeless applications to local councils are from BAME groups, even though they make up just over a tenth (11%) of all households in England.¹

Due to issues with the Broadland IT system we are unable to extract data relating to ethnicity of applicants for the housing list. With a new system coming into place in April 2021, recording will be improved and can provide a comparator with South Norfolk data. The Councils can use this data to ensure that services are accessible. It should also be noted that provision of this information is voluntary for all applicants and so may lead to some areas of under reporting.

1

https://england.shelter.org.uk/media/press_releases/articles/black_people_are_more_than_three_times_as_likely_to_experience_homelessness

We can, however provide data around ethnicity of applicants seeking assistance under a prevention or relief duty through the Homelessness Reduction Act (HRA) to give an overview. Data for 2019/20 suggests that of those approaching Broadland, 6.9% of applicants were from a Black, Asian, Mixed or Other Ethnicity². Taking Census 2011 data, the overall Broadland population of those with the same ethnicities was 2.3%. Although not at the same numbers as the England average above, it does indicate that there is a slightly higher representation from those of a Black, Asian or Minority Ethnicity who are homeless or at risk of homelessness.

In comparison, in South Norfolk, just 1.6% of HRA approaches were from a Black, Asian, Mixed or Other Ethnicity compared to an overall population percentage of 2.4%. However, only 88.1% of approaches were from white applicants as opposed to 97.6% of the overall South Norfolk population. For 10.2% of applicants, their ethnicity is not known, perhaps indicating under reporting.

The differences in the data highlight the importance of the standardisation of the information supplied to the councils, this will enable the councils to carefully monitor the housing list and ensure that the policies and processes contained within the scheme does not have a negative impact.

The council also extends support to those of a Gypsy and Traveller background , firstly through the provision of a local connection for those who are Gypsy's,(as defined in the Caravan Sites Act 1968) who have habitually resorted to the area and wish to seek permanent 'bricks and mortar' housing.

Relevant to South Norfolk Council is the management of applications for pitches managed by a Registered Provider. The process detailed in the Allocations Scheme provides a consistent application procedure, and because available pitches will be allocated through a direct let process enables an assessment of priority need in addition to an additional assessment of any site-specific factors which will include consideration of the balance and mix in the community, therefore prioritising the long-term cohesion of the site.

Sex

The Councils acknowledge that some genders will be more represented in specific household categories approaching the housing service. For example, Domestic Abuse disproportionately affects women and children. National statistics state 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 Abuse Bill currently in progress through Parliament has been amended to recognise children as victims of DA in their own right.

Approximately 4.2% of men in comparison with 7.9% of women suffered domestic abuse in 2018 (ONS). As part of the Council's priority banding system, those who are homeless and fleeing violence or the threat of violence, including Domestic Abuse will be awarded the highest priority band on the Housing List – Band 1, to enable the applicant and their household to access safe housing. In addition, Domestic Abuse is one of the four priorities contained within the Greater Norwich Homelessness Strategy 2020-2025 with a focus to seek housing options to suit the varied needs of victims. This could include the provision of sanctuary schemes to prevent loss of current home. The Councils will also make use of direct and sensitive lets, where appropriate to ensure safety.

The Councils have extended Housing List qualification criteria to include where they are divorced, separated or a civil partner of service personnel and are required to move out of Ministry of Defence accommodation. This is in addition to former members of the armed forces and bereaved or widowed spouses. While this will mainly positively impact heterosexual women as they represent the greater proportion of spouses and civil partners in terms of Armed Forces personnel, it would not in consequence negatively impact males or those who identify as LGBTQ+.

Sexual Orientation and Gender Reassignment

² HCLIC Data 2019/20 <https://www.gov.uk/government/statistics/statutory-homelessness-in-england-financial-year-2019-20>

The Allocations Scheme contains no specific policies or procedures that relate to Sexual Orientation and Gender Reassignment, however, as with other protected characteristics, those who identify as LGBTQ+ may be more likely to be over represented in certain areas, for example, research from Stonewall (2018) suggests that 11% of the LGBT+ 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%.

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.

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

Health and Mental Health

This EqCIA details above how the Allocations Scheme can have a positive impact on those with a disability or health condition. In terms of mental health, the Councils acknowledge that worry over the loss of a home can exacerbate mental health, while mental health conditions can increase the risk of homelessness.

Policies and processes within the Allocations Scheme that aim to have a positive impact on MH include:

- Safe Surrender process, where an existing social housing tenancy is failing, the agreement enables the surrender of the tenancy before the situation escalates to a crisis and/or eviction. Safe Surrender agreements will be taken into account when assessing subsequent housing applications.
- Assisted bidding and Direct Lets for applicants who need additional support bidding or because their circumstances mean that a direct let to a specific property may provide the best option.

Place inc. Rurality

Measures contained within the Allocations Scheme seek to support safe, coherent communities. These include:

- Properties being available for applicants across both districts, subject to the property not being allocated to an applicant on the list for the 'home district' of the property. This ensures that no property is left empty and they retain their use as a home, reducing the prospect of ASB and providing an element of mobility amongst residents of South Norfolk and Broadland.
- S106 properties enabling local residents to access affordable housing in their area
- The suspension of bidding process where ASB has been an issue
- The provision of sensitive lets where a property has a management history which requires the careful selection of the next tenant to ensure harmony in the area where it is located.

Low Income and Poverty

Affordability of housing can be one of the main reasons applicants approach for housing advice and access to the housing list. This is more likely to affect, in particular, single income households, for example, young and single people and single headed households. To provide some illustration, of those who approached the Councils as homeless or threatened with homelessness under the HRA in 2019/2020 just under 50% of those were aged under 34. Single males comprised an average of 39% of approaches, 20% were single females. From the perspective of single adult headed households, just under 3% were headed by a male

and 23% headed by a female. Nationally ONS statistics state that 86% of single parent households are headed by women, however the number of male headed families has increased by 22% overall.³

Furthermore, private rental prices average at £404 pm in Norwich (Broadland and South Norfolk figures not available) for a room in a shared property and an average of £785 in Broadland for a three bedroom property (ONS, 2020)⁴. Applying the salary principle of 30x monthly rent used by letting agents to determine affordability this requires an annual salary £12,409 and £23,550. For those eligible for assistance with housing costs, a welcome rise in Local Housing Allowance (LHA) rates was introduced in April 2020⁵, 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 £76 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.

Although the statistics above don't take into account all reasons for households applying to the housing list, such as medical need, overcrowding etc. it does indicate that affordability can be a determining factor in approaching the housing list. This is going to be particularly pertinent as the economic impacts of COVID-19 continue to become apparent.

For young and single people, based on an assessment of their circumstances and needs, an application to the housing list may not be the most suitable housing solution. However, the Accommodation Pathway model, within which the Allocations Scheme sits seeks to provide a one-stop housing advice platform on a wider basis than that of social housing. This could include measures to prevent housing crisis, remaining in the family home, debt and welfare advice and support into the private rental sector, including rent and deposit schemes.

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?**

The detail contained within questions 4-6 above provide examples of characteristics, including protected characteristics of those who may be more likely to approach the councils, either in, or to prevent housing crisis or who are experiencing a change in circumstances, and which could be resolved through an application to the housing list.

It also gives detail of the measures contained within the Allocations Scheme which are designed to have a positive impact for people for will identify as having one or more of those characteristics, including where the Councils seek to reduce the barriers for approach for housing advice. The Allocations Scheme will need to be carefully monitored and reviewed to ensure that the predicted impacts remain positive or neutral in particular with regard to,

- The suspension of bidding process
- The re-assessment of non-qualified applicants
- Continued impacts of COVID-19
- Impacts from Britain's exit from the EU, especially in relation to eligibility criteria for people from abroad

³

<https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/families/bulletins/familiesandhouseholds/2019>

⁴

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/privaterentalmarketsummarystatisticsinengland/april2019tomarch2020>

⁵ <https://lha-direct.voa.gov.uk/>

Signed by evaluator: Victoria Parsons

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)

Housing Standards Enforcement Policy

Report Author(s): Leigh Booth
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Hub
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Portfolio: Cllr Yvonne Bendle, Better Lives

Ward(s) Affected: All

Purpose of the Report:

This report recommends the adoption of the Council's new Housing Standards Enforcement Policy.

Recommendations:

That Cabinet

1. Consider and approve the Council's new Housing Standards Enforcement Policy.
2. Approve alternative action in respect of the proposed new Housing Standards Enforcement Policy.

1 SUMMARY

- 1.1 This report provides context to the creation of the new Housing Standards Enforcement Policy.

2 BACKGROUND

- 2.1 In common with all Local Housing Authorities, the Council has a statutory role in ensuring the quality and suitability of homes in its area and address Hazards in people's homes. To do this, the Housing Standards Team works closely with home owners, housing associations and private sector landlords to ensure that properties within their ownership meet the required standard.
- 2.2 A multitude of legislative tools are available to assess properties and address Hazards and Risks. The Housing Act 2004 is the primary Act detailing 29 specific Hazards that may be assessed. The Act details procedures and duties for local authorities to address defects identified in people's homes. In addition various regulations have been introduced to amend the Act and provide bespoke procedures, for example specific Smoke Alarm Regulations.
- 2.3 The Housing Standards Enforcement Policy is a legislative reference document for officers in the Housing Standards Team. The Policy details what action can be taken and what legislative and regulatory basis there is for that action. It is an essential tool in ensuring that the Council remains legally compliant in its enforcement activity.
- 2.4 The current Housing Standards Enforcement Policy is out of date and needs to be updated to ensure the Council remains compliant with the latest housing enforcement legislation and regulations.
- 2.5 The appended policy has been written to meet the requirements of the Legislative and Regulatory Reform Act 2006 and the Regulators Code, which came into statutory effect on 6 April 2014. The Council has a duty to follow the principles of good regulation specified in the Act and to have regard to the Code when setting policies or principles that determine how we carry out our regulatory activities.
- 2.6 The focus of this report and the proposed new Housing Standards Enforcement Policy is in relation to the statutory and therefore non-discretionary powers that the Council has under a wide range of housing related legislation. Use of discretionary housing enforcement powers, including those relating to empty homes will be the subject of a separate report to Cabinet later in the year.

3 CURRENT POSITION

- 3.1 The Council's existing policy statement is in need of updating in order to reflect newly enacted regulations in relation to Electrical Safety Standards in the private rented sector.
- 3.2 In addition it has been agreed that a Banning Order Policy, that is solely applicable to Housing Standards related matters should be adopted. Therefore the opportunity has been taken to develop a Council Banning Order Policy, which has

been appended to the attached Housing Standards Enforcement Policy. The Banning Order Policy has been developed in accordance with the current MHCLG Guidance.

4 PROPOSED ACTION

- 4.1 In order to provide the Housing Standards Team with a legally compliant and legislatively up to date Enforcement Policy, it is proposed that the appended policy be agreed and adopted. The new policy, when agreed, will take immediate effect and will be published on the Council website.

5 OTHER OPTIONS

- 5.1 It is feasible that the Council could continue with the current Housing Standards Enforcement Policy, however such an approach would undermine the Council's ability to take effective enforcement action in respect of sub-standard housing in the district.

6 RISKS

- 6.1 **Resource Implications:** There are no new resource implications arising from this report.

- 6.2 **Legal Implications:** There are no direct legal implications arising from this report.

- 6.3 **Equality Implications:** There are no direct equality issues arising from this report and it has not been necessary to prepare an Equalities and Communities Impact Assessment.

The Housing Standards Enforcement Policy articulates the importance of ensuring that housing standards are adhered to in order to improve the quality of life of those living in sub-standard homes.

- 6.4 **Environmental Impact:** One of the primary roles of the Housing Standards Enforcement Policy is to address any adverse environmental impacts that might arise from poor housing conditions.

- 6.5 **Crime and Disorder:** The Housing Standards Enforcement Policy provides a clear statement of action that can be taken by the Council, should there be a breach of the relevant housing legislation. This will on occasion lead to enforcement action that will address illegal activity.

- 6.6 **Risks:** Not adopting an up to date Housing Standards Enforcement Policy could have both legal and reputational risks for the Council.

7 CONCLUSION

- 7.1 The current Housing Standards Enforcement Policy requires updating to reflect new legislation and practice, and in order to adhere to central government guidance.

8 RECOMMENDATIONS

- 8.1 That Cabinet
1. Consider and approve the Council's new Housing Standards Enforcement Policy.
 2. Approve alternative action in respect of the proposed new Housing Standards Enforcement Policy.

Background Papers

Improving the private rented sector – A Guide for Councils, MHCLG July 2020

Banning Order Offences under the Housing and Planning Act 2016, Guidance for Local Housing Authorities MHCLG April 2018

South Norfolk Council

Housing Standards Enforcement Policy

**Adopted: November 2020
Review Date: November 2022**

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SECTION 1. INTRODUCTION

1.1 General Principles

Enforcement action will be based upon an assessment of risk to residents' health and safety, public health and/or the environment.

All enforcement action will be based upon an objective assessment following consideration of all the facts of the matter, and will not be based on anecdotal evidence, hearsay or other subjective assessment.

It will not be normal practice for formal enforcement action to be used as a punitive measure for minor technical contravention.

All enforcement action shall have regard to relevant legislation, codes of practice and guidance periodically issued by the Government, the Chartered Institution of Environmental Health, Local Government Regulation and other relevant bodies. This also includes the Human Rights Act 1998 and the test of proportionality. Regard will also be had for departmental procedures and work instructions.

All authorised officers, when making enforcement decisions will abide by the requirements of the Housing Standards Enforcement Policy. Any departure from this policy must be exceptional, be capable of justification and be fully considered by the Assistant Director, Individuals and Families before the decision is taken, unless there would be a significant risk to public health and/or safety by delaying the decision.

SECTION 2. TYPES OF ACTION

2.1 Informal Action

2.1.1 Informal action to secure compliance with legislation includes:

- Offering verbal advice
- Verbal requests for action
- Informal written advice (visit reports and letters)

2.1.2 The circumstances where it is appropriate to use informal action are:

- Where the act or omission is trivial or not of a serious enough nature to warrant formal action.
- As an initial notification to the alleged offender of a minor problem.
- Where from the individual/organisations/businesses past history it can be reasonably expected that informal action will achieve compliance.

- Where confidence in the individual/businesses management is high.
- Where the consequences of non-compliance will not pose a significant risk to residents' health and safety or the environment.

2.1.3 There may be circumstances when some of the above are not met. However it may be more effective than a formal approach e.g. this may apply to charitable or voluntary organisations. If an authorised enforcement officer considers this is appropriate, they will discuss the matter with their line manager to ratify their action. For non-hazardous and minor contraventions, a revisit may be an inappropriate use of resources.

All enforcement documentation issued or sent, will:

- Contain all the information necessary to understand what needs to be done, why, when and by whom.
- Clearly distinguish between legal requirements and best practice advice or recommendations.
- Indicate the legislation that applies.

An authorised enforcement officer will at all times, even if only giving verbal advice, differentiate between legal requirements and matters which are recommended as good practice.

2.2 Formal Action

2.2.1 Relevant Legislation

Formal action to secure compliance with legislation may include:

- Improvement Notice (Housing Act 2004)
- Suspended Improvement Notice (Housing Act 2004)
- Prohibition Order (Housing Act 2004)
- Suspended Prohibition Order (Housing Act 2004)
- Hazard Awareness Notice (Housing Act 2004)
- Emergency Remedial Action (Housing Act 2004)
- Emergency Prohibition Notice (Housing Act 2004)
- Empty Dwelling Management Order (Housing Act 2004)
- Compulsory Purchase Order (Housing Act 2004 and/or Town & Country Planning Act 1990)
- Demolition Order (Housing Act 1985)

- Ruinous and dilapidated buildings and neglected sites Notice (Building Act 1984)
- Protection of Buildings Notice (Local Government (Miscellaneous Provisions) Act 1982)
- Drainage Notice (Building Act 1984/Public Health Act 1961)
- House in Multiple Occupation (HMO) Mandatory Licence (Housing Act 2004)
- The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018
- The Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018
- Caravan Sites Licence (Caravan Sites and Control of Development Act 1960)
- Direction Order (Criminal Justice & Public Order Act 1994)
- Civil Fine Procedures - The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc.) (England) Order 2014; The Smoke and Carbon Monoxide Regulations (2015); The Housing Act 2004 as amended by The Housing and Planning Act 2016; Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 Notices
- Works in Default
- Prosecution (summary or indictment)
- Rent Repayment Orders
- Banning Orders

2.2.2 Appropriate Circumstances

The circumstances where it is appropriate to use formal action include:

- There are significant contraventions of legislation.
- There is a lack of confidence in the individual/business to respond to an informal approach.
- There is a history of non-compliance with informal action.
- The consequence of non-compliance could be potentially serious to residents and/or public health.
- There is a requirement to issue a notice to protect the resident from any retaliatory conviction.

- Although prosecution is intended, immediate or swift action is necessarily required to remedy a serious threat to public health.

2.2.3 Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020

This recently enacted legislation enables a range of Notices to be used. The relevant Notices are:

- Remedial Notice (Regulation 4 (1))
- Remedial Action Notice (Regulation 6 (2))
- Urgent Remedial Action Notice (Regulation 10 (3))

The Council may consider it necessary to deal with non-compliance with the processes, (as detailed in the above regulations), using summary proceedings in a Magistrates Court or via the Civil Fine procedure as detailed in Appendix A.

2.2.4 Improvement (IN), Prohibition (PN), Emergency Prohibition (EPN) and Hazard Awareness Notices (HAN) (including Suspended, Improvement and Prohibition Notices)

The circumstances where authorised officers will consider the service of Improvement, Prohibition and Hazard Awareness notices under the Housing Act 2004 includes one or more of the following:

- An assessment of a property under the Housing Health and Safety Rating System (HHSRS) reveals the presence of one or more Category 1 Hazards, (hazards rated A, B or C). The Council has a duty to take action.
- An assessment of a property under the HHSRS reveals the presence of one or more Category 2 Hazards, (hazards rated D, E, F, G, H, I or J). The Council has a discretionary power to take action.
- There is little confidence in the individual/business resolving the matter through an informal approach.
- The service of a notice is the only realistic option to secure compliance.
- There is a history of non-compliance with informal action.
- Standards are generally poor with little management awareness of statutory requirements.
- There is a realistic chance of securing conviction for non-compliance
- The consequences of non-compliance could be a risk to

residents' health and safety.

- Previous action has failed to resolve the issue in question.

In general, improvement and prohibition notices will not be used for minor technical contraventions but will be used where there is a risk to resident's health and safety. Hazard awareness notices may be used where the risks are either minor or where it is deemed impracticable for works to reduce or eliminate more serious risks.

Authorised enforcement officers will only serve an improvement notice where they are satisfied that service of a notice is the most appropriate course of action and will discuss the content of the notice with a colleague, usually their line manager, **before** service takes place.

Notices will only be issued and signed by those officers authorised to do so. Authorised enforcement officers will only consider service of an improvement notice in respect of one or more HHSRS Category 2 Hazards where the following applies.

HHSRS Band D Hazard

There will be a general presumption that where one or more Band D hazards exist, officers will consider action under the Housing Act 2004. Where the hazards identified relate to "Damp and Mould" and "Fire", action will be determined as if the assessment for a "vulnerable occupant" is the "actual occupant". Where "Excess Cold" is identified as a Band D hazard, insulation works to the property will be considered a priority when enforcement action is taken.

Multiple HHSRS Hazards Bands D – I

Where a number of hazards at Band D or below appear, when aggregated together, to create a more serious situation, or where the property appears to be in an un-maintained and/or dilapidated condition, the Housing Standards Senior Manager or the Assistant Director, Individuals and Families may authorise action under the Housing Act 2004.

Officers will discuss the content of the notice with a colleague, usually their line manager, **before** service takes place.

Authorised enforcement officers will place realistic time limits on improvement and prohibition notices which, where possible, will be agreed with the recipient as being attainable. Wherever possible, the authorised officer should also discuss the contents of the notice with the recipient and will consider any alternatives that may be put forward by the recipient at that time.

Generally, in cases where there has been a failure to comply with an improvement or prohibition notice, the Council will consider summary proceedings or a Civil Fine Procedure and works in default where they are also required.

2.2.5 Emergency Remedial Action

The circumstances where authorised officers will consider the undertaking of emergency remedial action includes one or more of the following:

- An assessment of a property under the HHSRS reveals the presence of one or more Category 1 Hazard, (hazards rated A, B or C). The Council has a duty to take action.
- The hazard(s) involve an imminent risk of serious harm to the health or safety of any of the occupants in those or any other residential premises.
- There is little confidence in the individual/business resolving the matter through an informal approach.
- Taking emergency remedial action is the only realistic option to remove the imminent risk.
- There is a history of non-compliance with informal action.
- Standards are generally poor with little management awareness of statutory requirements.
- The consequences of in-action could be a risk of serious harm to residents' health and safety.
- Previous action has failed to resolve the issue in question.

Emergency remedial action will not be used for minor technical contraventions but will be used where there is an imminent risk of serious harm to residents' safety. Emergency remedial action will only be approved by those officers authorised to do so.

Authorised enforcement officers will only approve emergency remedial action where they are satisfied that such action is the most appropriate course of action. They will discuss the details of the case, the required works and content of the notice with their line manager, **before** the action takes place.

Wherever possible, the authorised officer should also discuss the matter with the property owner(s) and will consider any alternatives that may be put forward by the recipient at that time.

Emergency remedial action will be followed in the statutory time (7 days), by a Housing Act 2004 Section 41 Emergency Remedial Action Notice.

2.2.6 Empty Dwelling Management Order (EDMO) and Compulsory Purchase Order (CPO)

Actions in relation to empty homes will be carried out in accordance with the current approved Council policy.

The circumstances where authorised officers may consider the initiation of an EDMO or CPO includes the following:

- These Orders will only be considered in respect of long term empty property where all other actions have failed to result in the dwelling coming back into use within a reasonable timeframe.
- Additionally a CPO may be considered without previous engagement, where a suitable long term empty property is brought to the Councils attention in an area of housing need, and where the owner has made it clear they have no intention to have the property occupied, and has no good reason for that intention.
- A CPO will not be initiated without prior authorisation from the Assistant Director, Individuals and Families in consultation with the relevant Portfolio Holder.
- The owner(s) have been fully appraised of their statutory compensation rights.

Only enforcement officers authorised to issue EDMOs shall do so and they must follow and have due regard to the statutory guidance under the Housing Act 2004 and relevant case history decisions from the Residential Property Tribunal.

2.2.7 Demolition Order

The serving of a Demolition Order may be considered appropriate to deal with a property (normally a detached property) where a full socio-economic assessment indicates that there is no other reasonably acceptable alternative.

The Council will not serve a Demolition Order unless satisfied the following conditions are fulfilled:

- There must be sufficient evidence to instigate prosecution proceedings.
- There must be adequate arrangements in place to ensure that the Demolition Order does not result in homelessness of any occupants.
- The owner(s) have been fully appraised of their statutory compensation rights.

2.2.8 Ruinous and Dilapidated Buildings and Neglected Sites Notice, (Building Act 1984),

Protection of Buildings (Local Government Miscellaneous Provisions Act 1982),

Drainage Notice (Building Act 1984 and Public Health Act 1961).

These notices will be considered in the following circumstances:

- An assessment of the property indicates defects likely to lead to risks to public health or safety.
- There is little confidence in the individual/business resolving the matter through an informal approach.
- The service of a notice is the only realistic option to secure compliance.
- There is a history of non-compliance with informal action.
- Standards are generally poor with little management awareness of statutory requirements.
- There is a realistic chance of securing a conviction for non-compliance.
- The consequences of non-compliance could be a risk to residents' health and safety.
- Previous action has failed to resolve the issue in question.

2.2.9 Houses in Multiple Occupancy (HMO) and Holiday Caravan Sites Licences.

These licences will be issued on application by a relevant fit and proper person and payment of the appropriate fee.

Conditions will be attached to Holiday Caravan Site Licences in accordance with statutory guidance and Model Standards where applicable. Conditions for relevant HMO's that require a licence, will include statutory conditions and additional conditions based on, but not exclusive to, the Councils adopted 'Landlord's guide to amenities and facilities for licensed HMO's'.

A person commits an offence for breaches of Licence conditions of Holiday Caravan Sites. Section 72 of the Housing Act 2004 details offences relating to the HMO licensing procedure. Such offences will be dealt with according to the general policy on Prosecutions and Civil Penalties (See Appendix 1).

2.2.10 Residential Caravan Sites Licences (Breach of conditions)

The circumstances where authorised officers will consider the service of a Compliance Notice under the Caravan Control of Development Act 1960 includes one or more of the following:

- There is little confidence in the individual/business resolving the matter through an informal approach.
- The service of a notice is the only realistic option to secure compliance.
- There is a history of non-compliance with informal action.

- Standards are generally poor with little management awareness of statutory requirements.
- There is a realistic chance of securing a conviction for non-compliance.
- The consequences of non-compliance could be a risk to residents' health and safety.
- Previous action has failed to resolve the issue in question.

2.2.11 Direction Order

Service of a Direction Order is only relevant to unauthorised encampments, and will only be considered after a meeting under the auspices of the Norfolk Protocol for the Consideration of Unauthorised Encampments has been convened.

A protocol meeting will consider all aspects of the encampment including the health, safety, welfare, human rights etc. of the campers, balancing the human rights of the campers, with those of any affected nearby settled residents. The campers will be invited to send a representative to the Protocol meeting.

In cases of urgency, a Direction Order may be considered without prior reference to a Protocol meeting but in these cases the matter must be discussed with the Assistant Director, Individuals and Families and their agreement obtained. Where practicable the County Traveller Liaison Officer will be notified of such urgent action.

2.2.12 Works in default

The Council will consider it appropriate to instigate works in default where one or more of the following criteria are met:

- The relevant person has failed to comply with a statutory notice requiring the execution of works.
- It is considered unlikely that the relevant person has any intention to carry out the required works.
- It is considered that the relevant person does not have the capability or capacity to organise and execute the required works.
- One or more of the property's occupants are considered to be vulnerable.
- Where the relevant person demonstrates a flagrant disregard for the health and safety of his tenants, and/or a flagrant disregard for the requirements of the legislation, consideration will be given, where statute empowers, to undertake works in default

and a simultaneous prosecution.

2.2.13 Simple Caution

The issuing of a caution may be considered appropriate under the following circumstances:

- To deal quickly and simply with less serious incidents.
- To divert the accused from an unnecessary appearance in the criminal courts on matters that can be more quickly and equally efficiently dealt with by way of a simple caution.
- To reduce the chance of a repeated offence.

The Council will not issue a caution unless the following conditions are fulfilled:

- There must be sufficient evidence to instigate prosecution proceedings.
- The offender must admit the offence.
- The offender must show remorse and have undertaken to prevent recurrence of the offence.
- The offender must accept the caution once they have understood its importance and significance and have given a written consent to being cautioned.
- Commencing a prosecution proceeding is not in the public interest, taking into account the public interest principles described in The Code of Practice for Crown Prosecutors.

If a person declines the offer of a caution, prosecution proceedings will normally be the next course of action. In some circumstances, the Council may consider a written warning will suffice instead of a caution, e.g. in the case of an offence which is minor in nature.

2.2.14 Prosecution

The Council will consider it appropriate to instigate prosecution proceedings where one or more of the following criteria are met:

- There is general disregard for the law, particularly where the economic advantages of breaking the law and/or the loss/adverse impact or potential loss/adverse impact on others resulting from the offence are substantial.
- There appears to have been a disregard for residents' health and safety.
- There is a history of non-compliance with the law, an approved Code of Practice or the relevant guidance, and the person in charge and/or company is not intending to rectify or deal with this non-compliance.

- The person in charge and/or company is not capable of dealing adequately with the issues and is not prepared to pay for professional advice, or take on board recommendations.
- As a result of a legal contravention, there has been a serious incident or case of ill health.
- The offence involves failure to comply with a notice.

When considering whether to prosecute for a breach of legislation following an incident, the seriousness of the contravention not the severity of the incident, is the prime issue for consideration. The extent of personal or company responsibility for the incident is also relevant.

Due regard must also be taken of guidance contained in The Code of Practice for Crown Prosecutors issued by the Crown Prosecution Service and relevant statutory codes of practice and the test of proportionality under the Human Rights Act. Factors to be considered may include:

- The seriousness of the alleged offence.
- The risk of harm to public health.
- Identifiable victims.
- Failure to comply with a statutory notice served for a breach of legislation.
- Disregard of public health for financial reward.
- The previous history of the party concerned.
- Offences following a history of similar offences.
- Failure to respond positively to past warnings.
- The likelihood of the alleged offender(s) being able to establish a due diligence defence.
- The ability of any important witness to give evidence and their willingness to co-operate.
- The willingness of the alleged offender to prevent recurrence of the alleged offence.
- The probable public benefit of a prosecution and the importance of the case e.g. whether it might establish a legal precedent.
- The more serious the offence, the less likelihood that the public interest will allow anything other than a prosecution.
- Whether other action, such as issuing a simple caution in accordance with current government guidance.
- Any explanation offered by the alleged offender, (person or company representative).

Once a decision to instigate prosecution proceedings has been taken, the matter should be referred, without undue delay, to the Council's legal advisors.

2.2.15 Fine Procedures

The Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc.) (England) Order 2014

Where the Council is satisfied on the balance of probabilities that a person has failed to comply with the requirement to belong to a Redress Scheme the Council may, by notice, require the person to pay the authority a penalty of £5,000.

The Council will initiate a fine procedure detailed in the Order where satisfied that a person has failed the requirement without any warning procedure.

The Smoke and Carbon Monoxide Regulations (2015)

Where the Council is made aware that a rental property does not have a Smoke Alarm fitted on every floor and a Carbon Monoxide Alarm fitted to any habited room which contains a solid fuel burning combustion appliance, or that such an alarm was not appropriately checked at the start of a tenancy, the Council will consider issuing a penalty notice.

The level of fine imposed will be determined by procedures detailed in the Councils "Statement of Principles" which can be found on the Council website.

Financial Penalties as an Alternative to Prosecution

The Housing and Planning Act 2016 amends the Housing Act 2004 by introducing a new Section 249A, to enable local housing authorities to impose a financial penalty up to £30,000 as an alternative to prosecution for the following offences under the Housing Act 2004:

- Failure to comply with an Improvement Notice (section 30).
- Offences in relation to licensing of Houses in Multiple Occupation (Section 72).
- Offences in relation to licensing of houses under Part 3 of the Act (Section 95).
- Offences of contravention of an overcrowding notice (Section 139).
- Failure to comply with management regulations in respect of Houses in Multiple Occupation (Section 234).
- Breach of a Banning Order (Section 21 of the Housing and Planning Act 2016).

The criminal burden of proof, i.e. beyond all reasonable doubt will be satisfied before a Civil Penalty is issued as an alternative to prosecution. The Council

will satisfy itself that a realistic prospect of conviction will be achieved prior to the introduction of this Civil Penalty.

The Council will assess whether there is sufficient reliable evidence to prosecute with regard to The Code of Practice for Crown Prosecutors. The Council will consider any potential defences available and in certain circumstances may decide to conduct an interview under caution in accordance with PACE codes of practice to assist in determining whether the issue of a Civil Penalty is appropriate or not.

The decision to impose fixed penalty notices under the Housing Act 2004 as amended, is delegated to the Assistant Director, Individuals and Families. Determination of appropriate penalty levels will follow the procedure as approved by the Council.

2.2.16 Rent Repayment Orders

Under Section 40(2) The Housing and Planning Act 2016 a Rent Repayment Order (RRO) requires the landlord, under a tenancy of housing in England, to repay an amount of rent paid by a tenant, or a local housing authority, an amount in respect of a relevant award of Universal Credit paid (to any person) in respect of rent under the tenancy.

RROs have now been expanded to cover the following Housing Act 2004 offences:

- Section 30(1) failure to comply with an improvement notice.
- Section 32(1) failure to comply with a prohibition order etc.
- Section 72(1) control or management of an unlicensed HMO.
- Section 95(1) control or management of an unlicensed house.

And

- Section 21 of the Housing and Planning Act 2016 for breach of a Banning Order.

If the Council becomes aware that a person has been convicted of such an offence, the Assistant Director Individuals and Families will consider the commencement of proceedings at the First Tier Tribunal for a RRO. This will however only apply in cases where the Council has paid rent, in the form of Universal Credit/Housing Benefit on behalf of the tenant.

2.2.17 Banning Orders

The Housing and Planning Act 2016 makes provision for the imposition of banning orders. The Housing and Planning Act 2016 (Banning Order Offences) Regulations 2017 details Banning Order offences. Among other relevant offences detailed in the regulations, Housing Act 2004 offences for which a banning order may be used include:

- Section 30(1) failure to comply with an improvement notice

- Section 32(1) failure to comply with a prohibition order etc
- Section 72(1) control or management of an unlicensed HMO
- Section 95(1) control or management of an unlicensed house
- Section 139(7) Contravention of an overcrowding notice
- Section 234(3) Failure to comply with management regulations in respect of Houses in Multiple Occupation
- Section 238(1) False or misleading information

The Assistant Director, Individuals and Families will consider application to the First-tier Tribunal for a banning order against a person who has been convicted of a banning order offence.

A copy of the Councils Banning Order Policy is attached at Appendix 3.

Appendix 1 Civil Penalty Decision Process

This Civil Penalty Decision Process encompasses procedures for the Housing and Planning Act 2016 and the Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020.

Where the Local Housing Authority considers that a Housing Act offence has been committed it must decide whether to prosecute or to issue a civil penalty as an alternative to prosecution.

The following factors, whilst not exhaustive, are examples of where it would be appropriate to consider for prosecution:-

- The seriousness of the offence, for example breach of a Prohibition Order would be an offence only suitable for prosecution.
- The antecedents of an individual, for example a landlord indicates that he / she has been prosecuted for Housing Act / similar offences.

The following factors, whilst not exhaustive, are examples of where it would be appropriate to consider the issuing of a Civil Penalty:-

- No evidence of previous non-compliance with appropriate legislation
- No previous convictions recorded
- Not in the public interest to prosecute
- Offence was committed as a result of a genuine mistake or misunderstanding (these factors must be balanced against the seriousness of the offence)
- Prosecution is likely to have a serious adverse effect upon an individual's eg a landlord physical or mental health, always bearing in mind the seriousness of the offence.

Determining the level of Civil Penalty

In order to ensure that the civil penalty is set at an appropriate level the following factors will be considered

- The seriousness of the offence, determined by harm caused and culpability of the offender
- The history of compliance of the offender
- The punishment of the offender for the offence
- The deterrent from repeating the offence
- The deterrent from others committing similar offences
- Removing any financial benefit obtained from committing the offence

Harm

In determining the level of harm the Local Housing Authority will have regard to

- The individual i.e. physical injury, damage to health, psychological distress
- To the community i.e. economic loss, harm to public health
- Other types of harm i.e. public concern/feeling over the impact of poor housing condition on the local neighbourhood

The nature of the harm will depend on the personal characteristics and circumstances of the victim e.g. tenant. Where no actual harm has resulted from the offence the Local Housing Authority will consider the relative danger that persons have been exposed to as a result of the offenders conduct, the likelihood of harm occurring and the gravity of harm that could have resulted

Factors that indicate a higher degree of harm include:

- Multiple victims
- Especially serious or psychological effect on the victim
- Victim is particularly vulnerable

Examples of Harm Categories that will be considered

High	Housing defect giving rise to the offence poses a serious and substantial risk of harm to the occupants and/or visitors for example danger of electrocution, carbon monoxide poisoning or serious fire safety risk
Medium	Housing defect giving rise to the offence poses a serious risk of harm to the occupants and/or visitors for example falls between levels, excess cold, asbestos exposure
Low	Housing defect giving rise to the offence poses a risk of harm to the occupants and/or visitors for example localised damp and mould, entry by intruders

Culpability

In determining culpability the Local Housing Authority will have regard to 4 levels of culpability.

Where the offender:

- Has the **intention** to cause harm, the highest culpability where an offence is planned
- Is **reckless** as to whether harm is caused i.e. the offender appreciates at least some harm would be caused but proceeds giving no thought to the consequences even though the extent of the risk would be obvious to most people
- Has **knowledge** of the specific risks entailed by his actions even though he does not intend to cause the harm that results
- Is guilty of negligence

Examples of Culpability that may be considered

Very High (Deliberate Act)	Intentional breach by landlord or property agent or flagrant disregard for the law i.e. failure to comply with a correctly served improvement notice
High (Reckless Act)	Actual foresight of, or wilful blindness to risk of offending but risks nevertheless taken by the landlord or property agent for example failure to comply with HMO Management regulations
Medium (Negligent Act)	Failure of the landlord or property agent to take reasonable care to put in place and enforce proper

	systems for avoiding commission of the offence for example; part compliance with a schedule of works but failure to fully complete all schedule items within notice timescale
Low (Low or no culpability)	Offence committed with little or no fault on the part of the landlord or property agent for example obstruction by tenant to allow contractor access, damage caused by tenants

Determining the Civil Penalty Amount

In assessing the seriousness there is a need to consider both culpability and harm. The table below sets out the interrelation between harm and culpability as a determinant of the Civil Penalty banding.

Harm	Culpability			
	Very high	High	Medium	Low
High	Band 5	Band 4	Band 3	Band 2
Medium	Band 3	Band 3	Band 2	Band 1
Low	Band 1	Band 1	Band 1	Band 1

Banding Levels

Band 1	£0 - £999
Band 2	£1000–£4999
Band 3	£5000–£9999
Band 4	£10,000–£19999
Band 5	£20000–£30000

The starting point in each band will be the midpoint i.e. for Band 3 the mid-point will be £7,500

- Band 1 relates to offences where there is a low risk of harm. Financial penalties at this level are designed to encourage compliance with lower level requirements for example failing to maintain yards and gardens or failure to display an information notice in a house in multiple occupation. They will also act as an initial deterrent where management standards are beginning to slip to prevent more significant contraventions.
- Bands 2 and 3 relate to more serious problems however a lower level of harm or culpability will reduce the need for higher fine levels.
- Band 4 and 5 fines relate to where there is a higher risk of harm and greater culpability. These offences carry significantly higher financial penalties.

Aggravating/Mitigating Factors

The penalty may be increased or decreased from the centre starting point within the band to the maximum or minimum level in the band. Issues affecting this decision are detailed in the table below

Issues relating to Aggravating/Mitigating Factors

Full co-operation following identification of offence	Reduce from starting
Minimal further input required by the council to achieve compliance	No adjustment

Significant involvement by the council required to achieve compliance	Increment increase
A significant lack of co-operation and/or obstruction leading to significant further enforcement activity (e.g. works in default)	Further incremental increase

Ability to Pay

1. Statutory guidance states that local housing authorities should use their existing powers to, as far as reasonably possible, make an assessment of a landlord's assets and any income (not just rental income) they receive when determining an appropriate penalty.
2. The existing powers available to the council include:
 - Section 235 Housing Act 2004 (power to require documents to be produced)
 - Housing benefit and council tax information (permitted by Section 237 of the Housing Act 2004)
 - Service of a requisition for information under section 16 of the Local Government (miscellaneous provisions) Act 1976 (power to obtain particulars of persons interested in land)
3. An offender will be assumed to be able to pay a penalty up to the maximum amount unless they can demonstrate otherwise. When a person receives a notice of intent to impose a financial penalty they have the right to make written representations about the proposal. We will specifically ask for those representations to include any evidence of the person's inability to pay the stated penalty.
4. If no representation is received then the starting assumption will be that the person is able to pay. This assumption will be tested against information held by the council such as council tax and housing benefit records, or publically available information such as company records or land registry entries.
5. Evidence put forward in a representation will be assessed for accuracy against council-held and public information.
6. Where appropriate, further information may be required through service of notice using the powers listed above.
7. Any evidence about ability to pay will be considered before a final decision is made about the level of the penalty.

Representations and Appeals

8. A person who receives a notice of the council's intention to impose a financial penalty may make written representations to the council. These should be

addressed to the Housing Standards Team or emailed to
psh.housing@broadland.gov.uk

9. Written representations will be considered by the Housing Standards Senior Manager.
10. A person who receives a final notice requiring a penalty to be paid may appeal to the First-tier Tribunal against
 - 10.1. The decision to impose the penalty, or
 - 10.2. The amount of the penalty
11. Details about how to make an appeal will be included with any final notice.

Recovery

12. A penalty must be paid within 28 days beginning with the day after that on which the notice was given
13. Where a penalty is not paid within 28 days, the councils will seek to recover it through a county court order.

Appendix 2 Government Penalty Process

Matrix for civil penalties

- This matrix has been developed to help local authorities use their powers under the Housing and Planning Act 2016 to impose a civil penalty as an alternative to prosecution for certain housing offences;
- This matrix is not binding and local authorities may choose to take a different approach
- In this matrix the following banding has been applied:

Band 1	£0 - £4,999	ASP £2,500
Band 2	£5,000 - £9,999	ASP £7,500
Band 3	£10,000 - £14,999	ASP £12,500
Band 4	£15,000 - £19,999	ASP £17,500
Band 5	£20,000 - £24,999	ASP £22,500
Band 6	£25,000 - £30,000	ASP £27,500

(ASP = Assumed Starting Point)

Level of Culpability	Assessment
Low	
Medium	
High	
Level of Harm (potential or actual)	
Low	
Medium	
High	
Culpability and Harm (combined)	
Civil Penalty Band 1	Amount
Aggravating factors 2	Revised penalty
Mitigating factors 3	Revised penalty
Income/asset check 4	Revised penalty
Final assessment	Final amount

1

Low culpability/high harm = Band 4	Medium culpability/high harm = Band 5	High culpability/high harm = Band 6
Low culpability/medium harm = Band 3	Medium culpability/medium harm = Band 4	High culpability/medium harm = Band 5
Low culpability/low harm = Band 1	Medium culpability/low harm = Band 2	High culpability/low harm = Band 3

1 Penalty to be increased by £1k for each aggravating factor up to a maximum of £5k

2 Penalty to be decreased by 31k for each mitigating factor up to a maximum of £5k

3 Offender assumed able to pay a penalty up to a maximum unless they can demonstrate otherwise.

Appendix 3 Banning Order Policy

Purpose

The purpose of this policy is to set out how Broadland and South Norfolk Councils will:

- decide when to apply for a Banning Order, and
- how we will determine the length of time we will request the ban apply for

This policy applies only to Housing Standards offences and is designed to ensure transparency, consistency and fairness in how and when banning order are sought and accords with the published MHCLG guidance.

Legislation

The Housing and Planning Act 2016 enables the Councils to pay for the FTT to impose a banning order on an individual following conviction for a banning order offence.

Considerable Offences

The offences for which a banning order may be applied for are listed in the statutory regulations issued in 2017 and apply to convictions for these offences issued either on or after 6 April 2018.

Spent convictions cannot be considered and if an absolute or conditional discharge for a relevant housing offence has been given, then that offence cannot be regarded as a considerable banning order offence.

Principles of Banning Orders

The MHCLG guidance sets out an expectation that banning orders should be aimed at the most serious offenders.

Length of Banning Order

It is not possible for the Councils to determine the length of a banning order, however we will make a recommendation to the FTT with accompanying reasons. A banning order is for a minimum of a 12 month period but there is no statutory maximum limit.

Determining When to Apply for a Banning Order

The Councils will consider applying for a banning order for the most serious and pernicious offenders. In doing so, the following factors will be considered:

- The seriousness of the offence
- Any previous convictions or listing on the National Rogue Landlord Database
- The harm caused to the tenant by the offence
- Whether the recommended punishment is proportionate to the offence
- Will it provide sufficient deterrent and prevent repeat offending
- Will it deter others from committing similar offences

Where it is deemed appropriate and proportionate to do so, the Councils will make full use of the powers to apply for banning orders.

The decision whether to pursue a banning order will be made on a case by case basis and will be based on legal advice. The decision will be made by either the Housing Standards Senior Manager or the Assistant Director Individuals and Families following a recommendation made to them by the case officer.

Procedure for Applying for a Banning Order

The procedure for applying for a banning order is set out in Section 15 of the Housing and Planning Act 2016 and can be summarised as:

- The Councils are required to issue a 'notice of intent' to the individual within 6 months of them being convicted of the relevant offence
- The person the notice relates to will have 28 days in which to make written representation to the Councils. The representation may be via any written format.
- Following the 28 day period, having given due consideration to any representation received, should the Councils still propose to pursue a banning order an application will then be made to the FTT

Requests for Information

Section 19 of the Housing and Planning Act gives provision to the Local Authority to be able to require that a landlord provide information for the purpose of enabling the Councils to decide whether to apply for a banning order. This can include requiring the landlord to provide details on ALL properties they own.

In relation to requests for further information made by the Councils under this section:

- It is an offence to ignore or fail to provide the information requested, unless the landlord can provide reasonable excuse
- It is an offence to provide false or misleading information
- Failure to provide information or providing false or misleading information is punishable on summary conviction to a fine.

Consequences of a Banning Order

Where a banning order is made, the individual will be determined not to be a 'fit and proper' to hold a license under Part 2 or 3 of the Housing Act 2004 and any licences in force under those parts will be revoked.

Where a banning order is made, the individual prohibited from:

- Letting housing in England
- Engaging in letting agency work within England
- Engaging in property management within England; or
- Doing two or more of those things (to ensure that any order is effective and to prohibit engagement in other related activities)

It is a criminal offence to breach a banning order and is punishable on summary conviction to imprisonment, a fine, or both.

Entry on the Rogue Landlord Database

Where a successful banning has been made, the Councils must make an entry on the National Rogue Landlord Database. The entry is maintained for the period of the banning order.

Publicity Following a Banning Order

Where a successful banning order is made, the Councils will consider whether to publish the details including the name of the individual who has been banned. The Councils may take legal advice prior to publication and will be cognisant of the relevant Ministry of Justice guidance as to whether to publish sentencing outcomes. Information on banned landlords will be made available to tenants on written request.

Public Space Protection Order - Dog fouling

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Portfolio: Clean and Safe Environment

Ward(s) Affected: All Wards

Purpose of the Report:

This report seeks Cabinet recommendations to Council for the making of a new dog fouling and dog restrictions PSPO under the Anti-social Behaviour, Crime & Policing Act 2014. This follows the expiry of the existing PSPO and proposes a new PSPO on a like-for-like basis and subject to an increase in the level of fixed penalty charge imposed for non-compliance.

Recommendations:

1. That Cabinet considers the outcome of the consultation and, if satisfied the need exists, recommends to Council that it makes a Public Space Protection Order to require people in control of dogs to clean up after them if they foul in a public open space and restrict dogs from enclosed children's play areas.
2. That Cabinet recommends to Council that it sets the Fixed Penalty charge for breaching the Public Space Protection Order to £100 (reduced to £80 if paid within 14 calendar days from issue of the Fixed Penalty Notice).

1 SUMMARY

- 1.1 The South Norfolk Council Public Space Protection Order (PSPO) No.1 expired on 17 October 2020. The PSPO is the mechanism by which the Council can incentivise people to clean up after their dogs if they have fouled in a public place or have allowed their dogs to enter an enclosed play area without reasonable excuse, and can enforce non-compliance.
- 1.2 The report seeks Cabinet recommendations for Council approval to make a new PSPO to apply to the whole South Norfolk Council administrative area under the Anti-social Behaviour, Crime & Policing Act 2014, requiring persons in control of dogs to clear up after them if they foul in a public place and to exclude dogs from enclosed children's play areas.

2 BACKGROUND

- 2.1 A PSPO is the principal measure available to Councils to combat dog fouling offending by irresponsible dog owners. These are made routinely by Councils across the country.
- 2.2 The previous PSPO was made in 2017 applying to the whole administrative area of South Norfolk and;
 - a) Required a person in control of a dog to clean up after it when it fouls in a public place; and
 - b) Excluded dogs from enclosed children's play areas (i.e. those enclosed by a fence) in South Norfolk that are open to the air.
- 2.3 The Order made exemptions for people who needed Assistant Dogs
- 2.4 There was provision in the legislation for the previous PSPO to have been extended for up to three years, an option that was discussed with our legal team who eventually advised that a new Order be made.
- 2.5 Before making a PSPO the Council must formally consult with the local police and local communities.

3 CURRENT POSITION/FINDINGS

- 3.1 Dog mess is arguably the most unacceptable and offensive type of litter on our streets and open places. Our research tells us that dog fouling remains an issue the public are concerned about.
- 3.2 Dog fouling is not only deeply unpleasant, it is dangerous. Whilst rare, contact with dog excrement can cause toxocariasis – an infection that can lead to dizziness, nausea, asthma and even blindness or seizures.

- 3.3 While most dog owners are caring, responsible individuals, there are still some people who do not clean up after their pets.

4 PROPOSED ACTION

- 4.1 When making an Order, a PSPO can run for a period of up to 3 years; it is proposed that the PSPO, if made, will be aligned with the Broadland Council PSPO that is due for renewal on the 28th February 2022. At that point both PSPO's will be reconsidered with a view to either extending them for a further period of 3 years or revoking them (as permitted under the Anti-social Behaviour, Crime & Policing Act 2014) if they are deemed unnecessary.
- 4.2 The purpose of synchronising the renewal dates for both Council areas will enable a shared process when the PSPO's are next due for consideration, making a saving in officer time, administration costs involved in the process and support effective enforcement.
- 4.3 It is also proposed to increase the Fixed Penalty Notice from £80 to £100 (the maximum allowed under the legislation) which will bring in line that imposed by other Norfolk Councils. The penalty would be reduced to £80 if paid within 10 days. A reduced charge for early payment helps to maximise compliance with fixed penalty notices and minimises needs for more costly follow-up action if they are unpaid.

5 OTHER OPTIONS

- 5.1 To not have a PSPO would leave the Council with limited sanctions to take against irresponsible dog owners. This option is not advisable as cleanliness of the open spaces of South Norfolk is highly desirable. People who do not clean up after their dogs shift the burden to South Norfolk residents.

6 ISSUES AND RISKS

- 6.1 **Resource Implications** – noting the recommended increase in fixed penalty charge for offending, otherwise no new resources implications have been identified. Signage is already in place and monitoring/enforcement is business as usual for the Community Protection Team.
- 6.2 **Legal Implications** – The legislation establishes a particular process for adoption of a PSPO. The PSPO as proposed is a readily administered legal sanction available to local authorities to tackle irresponsible dog owners and the enforcement process is straightforward.
- 6.3 **Equality Implications** – exemptions have been applied to make allowance for people reliant on assistant dogs.
- 6.4 **Environmental Impact** – the proposal will encourage dog owners keep our open spaces clean and increase compliance, having a positive impact on local environmental quality for our communities.

- 6.5 **Crime and Disorder** – the proposal will encourage responsible dog owners by providing an easily administered enforcement sanction against irresponsible dog owners.
- 6.6 **Risks** – PSPOs are made under the Anti-social Behaviour, Crime & Policing Act 2014 and are sometimes portrayed in some quarters as being draconian, however dog fouling is an area where there is near universal agreement that public spaces and children’s play areas should be kept clear of dog fouling.

7 CONCLUSION

- 7.1 Making and adopting the PSPO as proposed acts as a deterrent to irresponsible dog owners and demonstrates to our residents that the Council will put in place measures to protect their health and South Norfolk’s open spaces.

8 RECOMMENDATIONS

- 8.1 That Council considers the outcome of the consultation and, if satisfied the need exists, recommends to full Council that it makes a Public Space Protection Order to require people in control of dogs to clean up after them if they foul in a public open space and restrict dogs from enclosed children play areas.
- 8.2 That Cabinet recommends to Council that it sets the Fixed Penalty charge for breaching the Public Space Protection Order to £100 (reduced to £80 if paid within 14 calendar days from issue of the Fixed Penalty Notice).

Background Papers

None

Appendices

Appendix One – Proposed Public Space Protection Order No. 2

South Norfolk District Council 2020

The Anti-Social Behaviour, Crime and Policing Act 2014

Fouling of Land by Dogs

The District of South Norfolk Public Spaces Protection Order No. 2

1. South Norfolk District Council (“the Council”) hereby makes the following Order:

- a. This Order is made by the Council in exercise of its powers under Section 59 and Chapter 2 of Part 4 of the Anti-Social Behaviour, Crime and Policing Act 2014 (“the Act”) and this Order may be cited at the South Norfolk District Council Public Space Protection Order No. 2.
- b. The Council is satisfied that:
 - i. Activities carried on within the restricted area as defined in Article 2 below, being the fouling of land by dogs and/or the presence of dogs in enclosed play areas have had or are likely to have a detrimental effect on the quality of life of those in the area: and
 - ii. that such activities may be of a persistent or continuing nature and the restrictions imposed by this notice are justified.

2. The Restricted Areas

- a. This Order relates to all land within the administrative area of the Council, shown in red on the plan in Schedule 1 of this Order, (“the Restricted Area”). This Order relates to all public/private land open to the air to which the public have access with or without payment including but not limited to all public highways (to include verges, footways and footpaths), all public parks, pleasure grounds, sports grounds, playing fields and play areas.

3. Requirements and prohibitions

- a. Fouling – failure to remove dog faeces

If a dog defecates at any time on land within the restricted area the person who is in control of the dog at that time shall remove the dog’s faeces from the land forthwith. This restriction is subject to the exemptions as stated in Article 4.

- b. Exclusion – Dog Ban

A person in charge of a dog shall not at any time take the dog into, or permit the dog to enter or remain within, any enclosed play area within the restricted area. This restriction is subject to the exemptions as stated in Article 4.

4. Exemptions

- a. The restrictions and prohibitions defined in Article 3 of this Order shall not apply to a person who is:
 - i. registered as a blind person in a register compiled under Section 29 of the National Assistance Act 1948; or
 - ii. is deaf, in respect of a dog trained for death people and upon which he or she relies for assistance; or
 - iii. has a disability that affects their mobility, manual dexterity, physical coordination or ability to lift, carry or otherwise move everyday objects, in respect of a dog trained by a registered charity and upon which they rely for assistance.

5. For the purposes of this Order

- a. A person who habitually has a dog in their possession shall be considered in charge of the dog at any time unless at that time another person is in charge of the dog.
- b. Placing dog faeces in a suitable waste disposal receptacle shall be considered sufficient removal to satisfy the requirement of Article 3.
- c. The Council does not consider being unaware of dog defecation (whether by reason of not being in the vicinity or otherwise), or not having a device for or other suitable means of removing the faeces as an acceptable reason for failing to remove the faeces as require by Article 3.

6. Offences

- a. Under section 67 of the Act, it is an offence for a person, without reasonable excuse, to do anything that the person is prohibited from doing by a public space protection order or to fail to comply with a requirement to which the person is subject under a public space protection order.
- b. A person failing to comply with a requirement or prohibition set out in Articles 3(a) or 3(b) of this Order shall be guilty of an offence unless he or she has reasonable excuse for failing to do so.

- c. A person guilty of an offence is liable on summary conviction to a fine not exceeding Level 3 on the standard scale.
- d. Pursuant to section 68 of the Act, a Constable or authorised person of the Council, may issue a fixed penalty notice to anyone he or she has reason to believe has committed the offences specified above. This gives the person to whom it is issued the opportunity of discharging any liability to conviction for the offence by payment of a fixed penalty to the Council.
- e. The level of the fixed penalty shall be £100 save that if the fixed penalty is paid within 10 days following the date of the notice the amount payable is reduced to £80.
- f. A person who pays the fixed penalty within the period of 14 days following the date of the notice may not be convicted of the offence in respect of which the fixed penalty notice was issued.

7. Commencement and duration of the Order

- a. This Order comes into force on XXXXXXXX and shall remain in force until the 28th February 2022 unless extended under section 60 of the Act.

8. Right to Appeal

- a. Any interested person wishing to challenge the validity of this Order must do so within 6 weeks beginning with the date on which this Order is made or, if applicable, varied.
- b. An application under Section 66 of the Anti-Social Behaviour, Crime and Policing Act 2014 is to the High Court.
- c. An interested person means an individual who lives in the restricted area or who regularly works in or visits that area

Dated

The Common Seal of South Norfolk District Council

Was hereunto affixed in the presence of

Deputy Monitoring Officer

Officer of the Relevant Service

DRAFT

Planning Enforcement Plan and Strategy

Report Author(s): Stuart Pontin
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Portfolio: Stronger Economy

Ward(s) Affected: All

Purpose of the Report:

To outline the background to the review of the Planning Enforcement Service for South Norfolk Council to provide a high quality and customer focussed service and to establish an Enforcement Plan which sets out details of the service for Members and customers

Recommendations:

1. To agree the use of the Enforcement Plan at Appendix 1 for the Planning Enforcement Service at South Norfolk Council.
2. To agree the use of the Enforcement Strategy at Appendix 2 for the Planning Enforcement Service at South Norfolk Council.

1 SUMMARY

- 1.1 Following an internal review of the Planning Enforcement Service offered by South Norfolk Council, it is proposed to update the Enforcement Policy used by SNC to form an Enforcement Plan to be used in order to provide a high quality, customer focused service. In conjunction with this it is also proposed to publish an "Enforcement Strategy" to support the Enforcement Plan which provides more information about the enforcement service for customers.

2 BACKGROUND

- 2.1 An Audit review was undertaken in early 2020 which identified a number of actions be taken to improve the completeness of enforcement records including

correspondence to developers including timescales to address breach, together with an audit trail to provide an overview of the case including key dates such as dates of complaint received, dates of correspondence and site visits. In conjunction with this it was recommended to instigate the implementation of electronic files for the entire enforcement process, including filing of documents to the Document Management System. The audit also highlighted the need to review and update the Planning Enforcement Policy.

- 2.2 The Development Plan also identifies the need to scope a review of the enforcement plan to be undertaken in Quarter 1. This review has been undertaken during July 2020 and has considered the Audit recommendations.
- 2.3 South Norfolk Council has a Corporate Compliance and Enforcement Policy 2015, with an appendix which specifically relates to Development Management.
- 2.4 The National Planning Policy Framework (NPPF) (March 2012) issued by the Department for Communities and Local Government sets out that : ‘Effective enforcement is important as a means of maintaining public confidence in the planning system’. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. Local planning authorities should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so’.
- 2.5 At present, South Norfolk Council does not have an “Enforcement Plan” and as part of the enforcement review it is proposed to develop a Planning Enforcement Plan which updates the current policy to be used to provide a high quality, customer focused service. South Norfolk Council has a Corporate Compliance and Enforcement Policy which will be reviewed and updated at a later date, and the Planning Enforcement Plan appended to this report will form part of any review of the Corporate Policy.

3 CURRENT POSITION/FINDINGS

- 3.1 The Enforcement Policy currently seek as far as possible to achieve positive compliance with the law and to respond proportionately, taking account of the circumstances of the case, to provide a customer focussed service and work holistically with other service areas.
- 3.2 The South Norfolk service currently updates customers at key stages during the investigation and liaises with Members where it is proposed to take no further action. Quarterly reports are presented to the Development Management Committee relating to compliance where formal action has been taken. The monitoring of condition compliance is focused on major developments with a reactive service to smaller developments.

4 PROPOSED ACTION

- 4.1 It is proposed to retain the key elements of the existing Enforcement Policy and to enhance these by confirming the Council's priorities and service standards that the customer can expect in terms of the types of complaints that will be investigated and to define a timeline for the key actions, together with updates on how matters are progressing and to identify the next steps. These are set out in the Enforcement Plan and expanded on in the Enforcement Strategy, which will also form the basis of information available online for customers.
- 4.2 It is also proposed that a proactive approach is taken towards the monitoring of the commencement of developments which have planning permission.
- 4.3 To ensure that Members have an over view of current cases it is also proposed that a monthly report is provided to all members which highlights the key stages which have been undertaken. It is also suggested that these could be provided to Parish Council for their information. In association with the provision of this information, it is proposed that training is provided to ensure that this information is used appropriately.

5 OTHER OPTIONS

- 5.1 To continue to operate the current Enforcement Policy.

6 ISSUES AND RISKS

- 6.1 This is an update to the existing enforcement policy and does not raise any additional risks. Without an up to date enforcement plan our course of action in relation to enforcement cases could be challenged.

6.2 Resource Implications

- 6.3 Recommendations from the Audit report, together with remote working during Covid have highlighted the need to work more electronically and for files to be available electronically. To facilitate this, a Sparks project has been identified to include an additional category in the Idox Document Management System (DMS).
- 6.4 As part of the review it is recommended that a proactive approach is taken towards the monitoring of the commencement of developments which have planning permission to ensure compliance with associated conditions. This monitoring can be linked with existing commencement monitoring which is undertaken in connection with Building Control, Community Infrastructure Levy, Section 106 legal agreements and Planning Policy, together with other teams in the Council (ie Council tax).
- 6.5 **Legal Implications** – This is an update to the existing enforcement policy and does not raise any additional legal implications. We will take specific legal advice in relation to individual cases as appropriate.

- 6.6 **Equality Implications** – Where formal enforcement action is proposed in relation to specific cases an appropriate assessment will be undertaken at that time.
- 6.7 **Environmental Impact** – The proposals will have a positive environmental impact by ensuring that development does not have an adverse impact.
- 6.8 **Crime and Disorder** – The proposals will work in a positive way to ensure compliance with appropriate legislation.
- 6.9 **Risks** – No.

7 CONCLUSION

- 7.1 The review of the Planning Enforcement service has highlighted a number of enhancements to the current service. The proposed Enforcement Plan will develop the existing Enforcement Policy to provide a high quality, customer focused service and will be supplemented by the Enforcement Strategy.

8 RECOMMENDATIONS

1. To agree the use of the Enforcement Plan at Appendix 1 for the Planning Enforcement Service at South Norfolk Council.
2. To agree the use of the Enforcement Strategy at Appendix 2 for the Planning Enforcement Service at South Norfolk Council.

Background Papers

South Norfolk Council – Compliance and Enforcement Policy

Planning enforcement plan

The purpose of this plan

This plan sets out how the authority will respond to suspected breaches of planning and related controls in its area; how it will monitor the implementation of permissions; investigate alleged cases of unauthorised development and take action where it is appropriate to do so.

The Council is firmly committed to the effective enforcement of planning control. It views the harmful effects of any breach of planning control very seriously and has a compliance team based within the Planning Service area.

Introduction

The Town & Country Planning Act provides Local Authorities with the legislative background to exercise control over unauthorised development and non-compliance with any condition or limitation attached to a planning permission. Controls relating to advertisements, listed buildings, trees and conservation areas are found in separate legislation.

This document sets out the Council's plan for planning enforcement and the approach the Council will take in investigating and remedying breaches of planning control.

The National Planning Policy Framework (NPPF) states "*The purpose of planning is to help achieve sustainable development*". Enforcement is an integral part of the planning system and "*is important as a means of maintaining public confidence in the planning system*" (para. 207 of the NPPF).

There is a duty on planning authorities to investigate alleged breaches of planning controls and resolve issues effectively in accordance with the Development Plan, any Supplementary Planning Guidance and the National Planning Policy Framework (NPPF). However, any subsequent enforcement action is discretionary.

What is planning enforcement?

The overall objective of the planning enforcement function is to maintain the integrity of the planning system.

The main functions of planning enforcement are:-

- To maintain public confidence in the planning system:

The integrity of the Council's development management function depends on the Council's readiness to take enforcement action when it is considered expedient to do so. Parliament has given this Council the primary

responsibility for taking whatever enforcement action is necessary within the area for which it is Local Planning Authority.

Notwithstanding the above point it should be noted that the Broads Authority is the Local Planning Authority for enforcement matters within its area. The enforcement of matters relating to waste management and mineral workings is the responsibility of Norfolk County Council.

- To investigate alleged cases of unauthorised development both reactively and proactively:

The Planning enforcement team has both a proactive as well as a reactive role in monitoring the progress of development on sites and ensuring compliance with planning conditions. The team also responds to third party complaints and allegations about possible breaches of planning control.

- To act proportionately

Ensuring any enforcement action is commensurate with the breach of planning control to which it relates. Enforcement action will not normally be taken to remedy trivial or technical breaches of control which are considered to cause no harm to amenity or the public interest.

- To take action where it is appropriate to do so

Although nothing in this plan should be taken as condoning a wilful breach of planning law, the Council's enforcement powers are discretionary and will only be exercised when it is considered expedient to do so.

The following principles underpin the functioning of the service:

An emphasis on customer focus

- Allegations of suspected breaches of planning control can be reported to the Compliance team in person, by telephone, by email, by letter or via the Council's website.
- All complaints will be acknowledged within 3 working days and the complainant given the name of the officer assigned to investigate the particular case
- The identity of persons reporting suspected breaches of planning control will be treated as confidential. However, where the success of an appeal or prosecution is dependent on evidence being provided by the person who reported the breach, the Council will discuss with the individual concerned whether they are willing to relinquish their confidentiality and provide the required evidence before proceeding with formal enforcement action or a prosecution.
- Parish and Town Councils and Ward members will be provided with an update on a monthly basis as to the progress made on all the complaints received and planning permissions monitored within their respective areas.

- Updates will be given to a complainant at key stages and of the outcome of an enforcement investigation when the matter reaches a conclusion.

Effective decision making

- Upon receipt of a complaint an assessment will be made as to whether a breach of planning control exists. This may involve carrying out a site visit.
- We will prioritise:
 - Unauthorised development which is causing or threatening significant harm to public health and safety.
 - Cases where there is ongoing or immediate threat of irreversible harm to amenity or the environment.
 - Harm to areas protected by statutory designations such as Sites of Special Scientific Interest (SSIs), Conservation Areas Archaeological sites.
 - Harm to listed buildings and their setting.
 - Harm to trees and hedges, especially where protected by Tree Preservation Orders (TPO's) or Regulations.
 - Unauthorised development likely to harm protected species or habitats.
 - Monitoring of major developments.
- The Council's enforcement powers are discretionary and will only be exercised when it is considered expedient to do so.
- The majority of decisions as to whether and how to proceed with an enforcement investigation are vested in the Officers with only a very few cases being reported to members for consideration and for a course of action to be agreed.
- Development Plan policies, appeal decisions, case law, individual site circumstances and the level of harm likely to be caused will all be taken into account in respect of an individual case in order to ensure consistency in decision making.

Flexibility in applying procedures

- In most instances an attempt to persuade an owner or occupier of a site to voluntarily remedy the harmful effects of unauthorised development will be made. We will aim for this to be undertaken within 6 weeks of the initial site visit
- Lengthy negotiations however will not be allowed to hamper or delay whatever formal enforcement action may be required to make the development acceptable on planning grounds, or to compel it to stop
- In seeking to remedy a breach by negotiation regard is had to the statutory time limits beyond which the Council would be precluded from taking enforcement action together with relevant planning policies and other material considerations

- Each case is progressed as far as possible with the information available at that time
- Where a retrospective planning application is refused relating to an existing breach of the planning regulations the associated planning decision notice will be accompanied by an enforcement notice setting out what needs to be done to remedy the breach of planning control

Applying the most appropriate measures

- The council has a range of enforcement measures available and will have regard to which power (or mix of powers) is best suited to dealing with any particular breach of control to achieve a satisfactory, lasting and cost-effective remedy. This may result in some instances in letting the legislative powers of colleagues from other departments or even other agencies taking precedence to resolve issues which cross departmental boundaries.
- Wherever possible and appropriate the Council will seek to remedy breaches of planning control through negotiation and mediation.

Proactive enforcement

- The Compliance team proactively monitors planning conditions imposed on planning and other permissions both at the time of commencement of development and where appropriate at subsequent development stages
- The Compliance team, in conjunction with colleagues in other departments, will explore avenues of collaborative working which could include the issuing of fixed penalty notices to secure the remedying of breaches of planning and other related offences which cause harm to the public realm.
- The Compliance team will, when called upon to do so, provide advice to prospective and newly established businesses to ensure that they will not fall foul of planning and related legislation.

Planning Enforcement Strategy

This Enforcement Strategy supports the Enforcement Plan and explains the planning enforcement function. It will clarify the various breaches of planning control and criminal offences that planning enforcement can address and detail the powers given to the Council and how and when these powers may be employed.

The strategy gives clear guidance on what we can do and how complaints are prioritized. It explains how complaints can be made, and sets out what can reasonably be expected from the Council once a complaint has been made.

The document has been prepared in accordance with the advice contained in the National Planning Policy Framework (NPPF) (March 2012) issued by the Department for Communities and Local Government which states: 'Effective enforcement is important as a means of maintaining public confidence in the planning system'. Enforcement action is discretionary, and local planning authorities should act proportionately in responding to suspected breaches of planning control. Local planning authorities should consider publishing a local enforcement plan to manage enforcement proactively, in a way that is appropriate to their area. This should set out how they will monitor the implementation of planning permissions, investigate alleged cases of unauthorised development and take action where it is appropriate to do so'.

What will we investigate...?

A breach of planning control is defined in the Town and Country Planning Act 1990 as "the carrying out of the development without the required planning permission, or failing to comply with any condition or limitation subject to which planning permission has been granted". Whether something requires planning permission is not straightforward and while there are some fairly obvious breaches, such as building a new house without planning permission, many others are more difficult to define or less well known.

For example:

- Building work, engineering operations and material changes of use that are carried out without first obtaining planning permission;
- Development that has planning permission but is not carried out in accordance with the approved plans;
- Failure to comply with conditions or the terms of a legal agreement attached to a permission or consent;
- The unauthorised demolition of a building within a conservation area without planning permission;
- Works carried out to a listed building (both internal as well as external), which affect its historic character or setting, without listed building consent being granted;
- The unauthorised felling or carrying out of works to a tree which is protected by a Tree Preservation Order (TPO) or which is within a Conservation Area (CA);
- Unauthorised Advertisements;
- Failure to properly maintain land so that it detrimentally affects the amenity of the area;

- Failure to comply with the requirements of enforcement notices, breach of conditions notices and stop notices.

It should be noted that a breach of planning control becomes immune from enforcement action if no formal action has been taken within the time limits set out in the Town and Country Planning Act 1990 (as amended).

Essentially these time limits are: Four years from the substantial completion of a building or other operational development and for the change of use of any building to a dwelling house; and ten years for a continued use of land or breach of planning condition

Similarly, planning enforcement action can only be pursued where works have taken place without the benefit of, or are inconsistent with, planning permission. Therefore, domestic extensions, regardless of their impact on neighbours, are immune from planning enforcement action if they fall within permitted development rights; and those commenced with permission and built as approved also are beyond further control, even though a neighbour, perhaps new to the area, was not consulted.

In addition to investigating complaints which we receive relating to breaches of planning control, we will also undertake proactive investigations to ensure that development is built in accordance with its planning approval and associated conditional requirements.

Whilst it is not possible to check all developments, the combination of responsive and a proactive approach should raise awareness of the need for compliance, so maintaining a culture of compliance. This is likely to involve working more closely with other Council departments to ensure a co-ordinated and targeted approach which has the maximum impact.

What will we not investigate...?

What is not a breach of planning control?

Many issues that arise the council cannot get involved in as they are issues that are between two private parties, as those are considered to be civil matters. Other matters may be covered by other legislation but are not issues that the council as Local Planning Authority can get involved with. Some of these are:

- Internal works to a non-listed building;
- Matters controlled by other legislation such as Building Regulations / public nuisance / Highways / or the Environment Agency;
- Competition from another business;
- On street parking of commercial vehicles in residential areas;
- Obstruction of a highway or public right of way (the Police or Highways Authority may be able to get involved);
- Parking a caravan within the residential boundary of a property provided that its use is ancillary to the dwelling;
- Clearing land of undergrowth, bushes and trees (provided they are not subject to Tree Preservation Order, within a Conservation Area or owned by the council);
- Operating a business from home where the residential use remains the primary use;
- Boundary disputes – disputes about ownership are a private matter and cannot be controlled under planning legislation;

- Deeds and covenants which are a private matter between the signatories to the documents;
- Loss of value to a neighbouring property;
- Insertion of windows in dwellings – once a building has been occupied windows can normally be inserted into existing walls provided that there is not a planning condition to prevent the insertion of additional windows;
- Where development is 'permitted development' under the Town and Country Planning (General Permitted Development)(England) Order 2015.

How will the matter be investigated..?

Allegations about suspected breaches of planning control will be investigated thoroughly and accurately in accordance with the principles of Good Enforcement set out within the Local Government Concordat, and the principles contained within the Regulators Code.

The five principles of good regulation are:

- Transparency
- Accountability and Openness
- Proportionality
- Consistency
- Targeted (at cases where action is needed)

The integrity of the process depends on the Council's readiness to take proportionate enforcement action when it is required to do so. Parliament has given local planning authorities the primary responsibility for taking whatever enforcement action is necessary within their area and the council will exercise its planning enforcement powers rigorously when it is considered expedient to do so. This means that any action taken must be in the wider public interest and the action must be proportionate to the level of the breach. We will consider this by thorough assessment of the relevant facts in each case. Our consideration will be no different to those when considering the merits of an application for planning permission before the development started. For instance, if a development would have received planning permission, it will not be enforced against simply because it was carried out before planning permission was granted. Formal enforcement powers will not be used against trivial or technical breaches of planning control which cause no harm. The Council will always seek to 'remedy' a breach before considering formal action, often breaches can be resolved through negotiation, for example by working with the developer to alter a building so that it no longer requires consent, or by the submission of a retrospective application to seek consent.

When would formal action be considered?

- Where the breach presents significant harm to amenity, or the existing use of the land and buildings merits protection in the public interest.
- Where attempts to negotiate regularisation of the breach have failed, and the harmful effects of the development require enforcement action to make the development acceptable.
- Where planning permission for the development has been refused and the development is not acceptable in terms of planning policies or other material considerations.

Where formal planning enforcement action is taken, we will take steps to publicise this to act as a deterrent to other offenders.

The council has delegated authority to its officers to exercise the legislative powers available to it for breaches of planning control, the tools available are :

- **Planning Contravention Notice** – this requires persons to provide information in respect of the development and/or activities taking place on the land. These notices are often served as a first step to gain information from the person carrying out the development and/or activity before determining whether other notices should be served.
- **Enforcement Notice** – this is the principal tool to remedy a breach of planning control. It will specify what the alleged breach is, the steps that must be taken to remedy it, and a time period in which to carry out those steps.
- **Listed Building Enforcement Notice**- This is the equivalent Notice available under the listed building legislation
- **Breach of Condition Notice** – this is used to require full or part compliance with the conditions on the grant of a planning permission.
- **Stop Notice/Temporary Stop Notice** –these Notices requires activities to stop immediately on the land and are most commonly used to deal with breaches of planning control that are seriously affecting the amenity of nearby residents or to prevent serious or irreversible harm to the environment.
- **Untidy Land (s.215) Notice** – where the condition of buildings or land causes serious harm to the visual amenity of an area, the Council can serve a Notice on the owner and occupier, under Section 215 of the Town and Country Planning Act 1990, to remedy the condition of the land and buildings.
- **Court Injunction** – Although they are rarely used, legal powers are available for the council to apply to the High Court or the County Court for an injunction to stop an actual or alleged breach of planning control.
- **Prosecution** – the council can pursue prosecution proceedings against any person who carries out unauthorised works to trees that are protected by a Tree Preservation Order or are within a Conservation Area, unauthorised works to Listed Buildings, and certain unauthorised works of demolition works within Conservation Areas. Additionally, offenders may be prosecuted for non-compliance with a temporary stop notice, stop notice, enforcement notice and breach of condition notice.
- **Direct Action (with costs recovery)** – failure to comply with the requirements of a Notice may result in the council using powers available to it to enter land and carry out such works that are required by an Enforcement Notice. All costs incurred in carrying out such works can be recovered from the landowner. Where costs are not recovered, they can be registered as a charge on the land.
- **Advertisements** – the legislation (Town and Country Planning (Control of Advertisements) Regulations 2007) which deals with advertisements is separate from that dealing with general planning matters. The display of an advertisement without formal consent is an offence, and the council does have the power to prosecute the person displaying it, if it considered that it harms the amenity of the area or public safety. There is no need for an enforcement notice, or similar, to be served. If a person is found guilty of an offence, he or she could be liable to a fine.

Priorities

It is usually necessary to give priority to those issues where the greatest harm is being caused, as it would be inappropriate to investigate and pursue all allegations with equal priority and intensity. Therefore each case is prioritised according to the seriousness of the alleged breach. This priority is decided by officers, and subsequently reviewed after an initial site visit.

We will prioritise:

- Unauthorised development which is causing or threatening significant harm to public health and safety.
- Cases where there is ongoing or immediate threat of irreversible harm to amenity or the environment.
- Harm to areas protected by statutory designations such as Sites of Special Scientific Interest (SSIs), Conservation Areas Archaeological sites.
- Harm to listed buildings and their setting.
- Harm to trees and hedges, especially where protected by Tree Preservation Orders (TPO's) or Regulations.
- Unauthorised development likely to harm protected species or habitats.
- Monitoring of major developments.

What level of service can a complainant expect..?

We will promptly register every case and acknowledge receipt either by letter or by email within three working days. You will be given the name of the Compliance Officer dealing with your complaint so you know who to contact, together with a reference number.

We will then carry out some initial checks (usually including a site visit) in accordance with the priority given to the case, but in any event within ten working days.

Complainants will be updated by telephone, email, or by letter on completion of the site visit and/or initial assessment investigations as to whether -

- No breach was identified
- That there is a need for further investigations
- That a breach of planning control has occurred

Where there is an identified breach of planning control the following assessment will be made –

- What is the planning harm – how serious is it ?
- Would it be likely to be granted planning permission (with or without conditions)?
- Is it a minor breach (technical) or more serious?
- Can we resolve it simply by negotiation or modification?
- Is action needed quickly because the development or activity is harmful and not acceptable?

The decided actions will need to be proportional to the breach and balanced with the available resources. Dealing with enforcement cases can be a lengthy and complex process. The different types of enforcement cases vary considerably in complexity as does the time taken for their resolution. Where cases take a long time to resolve we will ensure complainants are updated at each significant stage of the process. For instance, complainants will be advised if a retrospective planning application is submitted and will be notified if an enforcement notice is issued and the relevant dates for compliance.

If the investigations indicate that a breach of control has occurred that justifies enforcement action an Enforcement Notice will be served. The Notice takes a minimum period of 1 month to come into effect during which time the person(s) served with the notice can appeal against it to the Secretary of State for Housing, Communities & Local Government via the Planning Inspectorate. An Enforcement Notice may be quashed or revised by the Planning Inspector appointed by the Secretary of State.

Where an appeal is lodged the Council can take no further action until the appeal has been decided. It is not unusual for the appeal process to take several months. If a person decides to appeal against an enforcement notice; this will add to the time taken to resolve the case. In consequence it is not possible to give a standard time for dealing with enforcement cases.

Where a Breach of Planning control causes serious harm the Council can seek immediate remedial action. This action may involve the serving of a Stop Notice when an Enforcement Notice has already been issued. Temporary Stop Notices may be served when an immediate cessation of the harmful activity is required, usually before an enforcement notice comes into effect. They can only last a maximum of 28 days and may only be served once. These should only be served to prohibit what is essential to safeguard amenity of public safety in the neighbourhood; or to prevent serious or irreversible harm to the environment in the surrounding area.

Notwithstanding the above we will regularly review all our cases to ensure the most effective action plan is in place to secure a satisfactory outcome as quickly as possible. Complainants will be advised when cases are closed, and the reason. We will endeavour to resolve enquiries within six months of their receipt. However should further action be required, such as the issue of Enforcement Notices, clearly this timescale will not be possible.

What happens when someone complains about you ?

If you are contacted about an alleged breach of planning control, you are entitled to know what the allegation is (but not who made it) and to have the opportunity to explain your side of the case. We are aware that sometimes people make complaints due to neighbour disputes, as such we will always seek to work with you to understand the true facts of the case.

Initially a council officer will visit the site. This is usually without any prior warning to the owner or any tenants / employees at the site. Officers are authorised to visit a site to investigate and will show identification when they arrive.

Council officers also have powers to obtain a warrant of entry where access is refused or refusal is anticipated. Wilful obstruction of a person exercising a right of entry is an offence so you should always seek to work with the council officer. However, we are required to give

24 hours notice to insist on entry to a residential house but if you are happy to allow us access then we will usually take up that offer.

In the event of a breach being established, your co-operation will be sought to correct the breach either by removing or modifying the unauthorised development or by ceasing the unauthorised use or activity prohibited by a planning condition. A reasonable period of time, which will depend on the nature of the breach, will be allowed for you to do this.

In some circumstances you may be invited to submit a retrospective planning application or other appropriate application if it is considered that consent may be granted, or an application for a Certificate of Lawfulness of Use or Development may be invited in the event that you can show that the breach is immune from enforcement action and therefore lawful. You may be served with a Planning Contravention Notice which requires information concerning the development carried out. This Notice is used to establish the facts of what has occurred so that we can determine whether a breach of control has occurred and whether formal action is appropriate. The implications of not completing and returning the Notice will be explained to you, and the officer dealing with the case will be available to answer any questions you have on the matter.

If you are running a business which is threatened by enforcement action, you will be directed to our Economic Development section to see whether alternative premises can be found to minimise the possible impact on the business, this does not mean that the enforcement action will be delayed or stopped.

If you are issued with an Enforcement Notice you will be given the precise details of the breach, the reasons for the action, the steps required to overcome the problem and the time period for compliance. You will also be advised of your right to appeal any notice issued.

The Compliance officers aim is to resolve breaches of planning control and they will work with you to achieve this in a positive and pragmatic way. Most breaches are resolved through negotiation and discussion, and we encourage you to cooperate positively. It is in the interests of all parties if an identified breach can be addressed and then resolved at an early stage.

What to do if you are unhappy with our service

The council aims to provide an efficient and effective service for everyone it deals with and to maintain good relations with those who use our services. Planning enforcement is a complicated area of law and care must be taken to arrive at a correct and appropriate course of action related to alleged breaches of planning control. If you are aggrieved with the service offered to you, there is a complaints procedure, where complaints can be investigated. Details of this procedure are available on the council's website. If you remain dissatisfied, the matter can be investigated by the Local Government Ombudsman. They will make an independent investigation of whether maladministration has occurred by the district council and if it has, recommend what remedy ought to take place. The Ombudsman will not normally deal with a complaint unless it has first been through the Council's own complaint procedures and deals only with aspects concerning the conduct of the investigation.

We always welcome constructive feedback and any ideas on how we can improve our services. Please contact us if you can suggest ways of improving the service.

Links

https://www.planningportal.co.uk/info/200125/do_you_need_permission

https://www.planningportal.co.uk/info/200130/common_projects/9/change_of_use

<https://www.gov.uk/government/publications/regulators-code>

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt?
Council Meeting 21 September 2020					
2 Nov	N	Housing Standards Enforcement Procedure	Leigh Booth	Yvonne Bendle	N
	N	Municipal Bonds Agency	Debbie Lorimer	Josh Worley	N
	N	Best in Class Housing Offer	Mike Pursehouse Richard Dunsire Victoria Parsons	Yvonne Bendle	N
	N	Council Tax Support Scheme	Richard Dunsire	Yvonne Bendle	N
	N	Public Space Protection Order (PSPO) Dog Fouling	Tony Cooke/ Teri Munro	Yvonne Bendle	N
	N	Review of Reserves for SNC and BDC	Rodney Fincham/ Madeleine Bussens	Josh Worley	N
	N	Budget Update Report	Rodney Fincham	Josh Worley	N
	N	Q2 Strategic Performance, Finance and Risks	Melanie Wiles/ Sinead Carey	Josh Worley	N
	N	Planning Enforcement Review	Helen Mellors	Lisa Neal	N
7 Dec	N	Procurement Options	Rodney Fincham	Alison Thomas	N
	N	Housing Standards Empty Homes Policy and other Discretionary Enforcement Options	Kevin Philcox	Yvonne Bendle	N
	K	Zone 4 Building Lease	Spencer Burrell/ Tig Armstrong	Lisa Neal	E
	N	Consultation followed by adoption of CAA and Boundary Amendments for Burston, Forngett, Gissing, Thorpe Abbots, Winfarthing and Wramplingham Conservation Areas	Chris Bennett	Lisa Neal	N
	N	South Norfolk Local Development Scheme	Paul Harris	John Fuller	N
	N	Empty Homes Policy and other Discretionary Enforcement Options	Kevin Wilcox	Yvonne Bendle	N
	Y	Poringland Neighbourhood Plan	Richard Squires	Lisa Neal	N
Council Meeting 14 December 2020					
11 Jan	N	Future Community Help Hub Approach	Kerrie Gallagher	Yvonne Bendle	N
	N	Recycling Facility	Simon Phelan	Michael Edney	N

Date	Key	Title of Report	Responsible Officer	Portfolio Holder	Exempt?
	N	ASB and Crime	Mike Pursehouse	Michael Edney	N
	Y	Greater Norwich 5-Year Investment Programme	Phil Courtier	John Fuller	N
	Y	Review of Bawburgh Temporary Stopping Place for Gypsies and Travellers	Kevin Philcox/ Leigh Booth	Yvonne Bendle	N
	N	Eligibility for Affordable Home Ownership	Keith Mitchell/ K Oglieve-Chan	Yvonne Bendle	N
	N	Leisure – Transformation	Simon Phelan	Alison Thomas	N
8 Feb	N	Q3 Strategic Performance/Finance and Risks	Mel Wiles/ Sinead Carey	Josh Worley	
	N	Revenue Budget 21/22, Capital Budget 21/22, Treasury Management Strategy 21/22	Rodney Fincham	Josh Worley	N
	N	Community Transport	Kerrie Gallagher	Yvonne Bendle	N
15 Mar	N	Community Wellbeing Offer	Dan Goodwin/ Simon Phelan	Yvonne Bendle	N

Key decisions are those which result in income, expenditure or savings with a gross full year effect of £100,000 or 10% of the Council's net portfolio budget whichever is the greater which has not been included in the relevant portfolio budget, or are significant (e.g. in environmental, physical, social or economic) in terms of its effect on the communities living or working in an area comprising two or more electoral divisions in the area of the local authority.