



Richmond Housing and Homelessness Strategy

Appendices

2021 – 2026

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Appendix 1. Temporary Accommodation Procurement and Placement Guidelines

Richmond Upon Thames Council

Temporary Accommodation Procurement & Allocation – Policy guidelines 2018

Statutory References	Housing Act 1996 Part VII (as amended) – generally and s208(1) specifically Children Act 2014 – generally and S11(2) specifically
Statutory guidance and regulations considered	Homelessness Code of Guidance for local authorities, issued by the Secretary of State under s182 (1) in 2006, generally and paragraphs 16.7 and 17.41 specifically. The Homelessness (Suitability of Accommodation (England) Order 2012 (SI 2012/2601) generally and article 2 specifically. ww Supplementary Guidance on the homelessness changes in the Localism Act 2011 and on the Homelessness (Suitability of Accommodation (England) Order 2012 generally and paragraphs 48 and 49 specifically.
Scope	These guidelines are applicable to both the provision of temporary accommodation which does not bring the s193(2) duty to an end and to Private Rented Sector Offers made to bring that duty to an end. With effect from the 3rd of April 2018, they also apply to accommodation offered present to either the prevention or relief activities/duties incorporated in Part VII by the Homelessness Reduction Act 2017.
Contextual information	These policy guidelines are recommended and adopted in response to the judgement of the Supreme Court in the case of (TN) Nzolameso v Westminster City Council (2nd April 2015). That judgement recommended that each local authority has policies in place and approved by elected members of the Council detailing: a) how the council will secure sufficient units of temporary accommodation to meet anticipated demand for the coming year reflecting its' obligations under both the 1996 Housing Act and the Children Act 2004 and b) How the Council will allocate such units of temporary accommodation as are available to individual homeless households, to which reference can be made when deciding and explaining who will or will not be allocated accommodation in and out of district. The Council's Housing and Homelessness Strategy for the period 2018-2023 was approved by the Council's Cabinet on the 15th March 2018 including these guidelines that report, which is essential reading to understand the full context in which they operate. The summary below sets out in broad terms the local housing and homelessness context.

The Housing and Homelessness position in the borough as at the 31st January 2018.

The Borough, in common with the majority of London boroughs, is facing significant demand for statutory homelessness services which are expected to expand, once the Homelessness Reduction Act changes take effect.

As at 31/1/18, the Council was providing temporary accommodation for 275 households (all household sizes); the use of temporary accommodation has remained relatively stable over the period of the previous strategy 2013-2018. However, during that period, the use of such accommodation by the London Boroughs collectively has increased significantly and this has made the market place for good quality accommodation much more competitive.

Within that London wide increase, homelessness from the private rented sector has risen sharply to be largest single cause of homelessness.

The borough is affected by the national cap on local housing allowance (LHA) levels (set at a maximum of £400 PW regardless of property size) and has significant numbers of households affected by the cap on total welfare benefits (currently set at £500 PW regardless of household size).

Rents levels within the Private Rented Sector have risen significantly over recent years, as have property prices in the borough.

At the 31/1/18, 78 per cent of all temporary accommodation used at the close of the year was located within the Borough, with a further 17 per cent located in the neighbouring borough of Hounslow. 4 per cent was elsewhere in London and 1 per cent accommodated outside of London.

The majority of out of borough placements comprises self-contained, nightly paid annex type accommodation, of which there is a very limited supply within the Borough, occupied on a spot purchased basis often at short notice.

Out of the 275 placements made at the end of January 2018, only three households were placed into Bed and breakfast accommodation whereas the other 272 were spread across other types of temporary accommodation, which, by a large majority, provide self-contained accommodation.

Most households placed into temporary accommodation are reliant, in part or in whole, on housing benefit/local housing allowance to meet their accommodation changes/rent.

During the first 10 months of 2017/18, 256 households were placed into temporary accommodation for the first time; an average of 25 households per month. The pattern of placements is not predictable or smooth and monthly totals ranged from 42 (in December 2017) to 15 (in June 2017).

In the same period, some 168 households were accepted, after assessment, for the main s193(2) duty.

The Council forecasts that its' use of temporary accommodation during 2018/19 will decrease by net 66 placements, as the Homelessness Reduction Act changes are made successful.

Arrangements for procuring temporary accommodation.

The Council has various supply streams providing temporary accommodation.

These include working with known accommodation providers/letting agents for bed and breakfast (not self-contained), bed and breakfast annex (self-contained), other nightly paid self-contained properties and include working with individual landlords for individual properties, secured on longer terms leases (3-10 years), and managed by the Council's in-house team or secured as a Private Rented Sector Offer.

Further the Council has a standing stock of hostels, within the Council's freehold ownership and managed by the in-house team. However, these largely cater for smaller households needing 2 bed rehousing.

The Council does not have any 'sole' provider arrangements with third party accommodation providers, most of who work with and across multiple Councils/Council areas. The marketplace is often characterised as a sellers, rather than a buyers, market.

Affordability Considerations

Both secondary regulations, statutory guidance and relevant case-law make clear that affordability is a key component of the suitability of accommodation and that unaffordable accommodation may not be regarded as suitable. For the purposes of these guidelines 45% of total income has been used as the maximum amount that should be spent on housing costs including rent.

For non-working households not exempted from the total welfare benefit cap the applicable maximum amounts paid by the DWP are as follows:

For Greater London, the cap is:

- £442.31 per week (£23,000 a year) for a couple, whether children live in the household or not
- £442.31 per week (£23,000 a year) for a single parent with children
- £296.35 per week (£15,410 a year) for single childless people, or with children living elsewhere

Applying 45% to those amounts the relevant notional maximum rent affordable to those subject to the cap are as follows:

Couple = £200 per week (rounded up)

Single parent with children = £200 per week (rounded up)

Single childless person = £134 per week (rounded up)

The availability of properties within and outside the borough

Where the Council is making placements under homelessness provisions i.e. under the interim duty, and especially where there has been little or no notice of homelessness arising e.g. in scenarios of domestic or other violence/harassment, accommodation choices can often be limited, and sometimes as low as one property only.

For emergency type placements, there are no bed and breakfast establishments within the borough that works within the homeless persons market. As such, through necessity, many such emergency placements will be to accommodation outside the borough, often in adjacent boroughs but regularly to areas further afield within and outside of London.

On the 13th February 2018, the following research was undertaken using the 'Rightmove' website to indicate the number of self-contained properties then made available for rent. That website was used on the advice of the Council's Valuation Service.

The distances involved and noted in the tables below reflect the 'distance from' filter used within that website.

The reference point was 'Richmond BR station' (which is approximately the 'middle' of the borough).

£800 pcm was used to limit the search parameters to equate to £200 per week for couples with and without children or single parents with children and £600 for single people without children

The filter limiting 'distance from' only covers the London Borough of Richmond when the '1 mile' filter is used.

All greater distances capture properties in and outside of the borough.

Results for couples/single parents with children (£800 pcm)

Distance from	Studio/ 1bed	2bed	3bed	4 bed	5 bed
0 mile	1	0	0	0	0
1mile	3 *	0	0	0	0
3 miles	13	0	0	0	0
5 miles	53	0	1	0	0
10 miles	190	2*	1*	0	0
15 miles	372	2*	20*	0	0
20 miles	512	2*	20*	0	0
30 miles	915	53 (Reading) (Gravesend) (Luton)	20*	0	0
40 miles	1217	145	2 flats only (Chatham) (Luton)	5*	0

Includes 2 flat shares or flat share only

Results for single people without children (£600pcm) = studios/1 bed only.

Distance from	Studio/1bed	2bed	3bed	4 bed	5 bed
0 mile	0				
1mile	1*				
3 miles	2*				
5 miles	13				
10 miles	26				
15 miles	58				
20 miles	72				
30 miles	125 (Sidcup) (Harlow) (Luton)				
40 miles	177				

Includes 2 flat shares or flat share only

Conclusions:

From the information contained in the tables above, it is obvious that, aside from social rented properties, the availability of properties of the size needed by families with children at a rent linked to both the Total Welfare Benefit Cap and/or average wages/salary on the market within the Borough is extremely limited or non-existent.

Further, it must be remembered that, just because a property is notionally available, it does not follow that the landlord would be willing to consider taking a family from the Council; it is well known that many landlords take a business decision not to let to 'homeless' families or to families otherwise reliant on housing benefit/local housing allowance.

Based on her experience, the opinion of the Council's Accommodation Procurement Manager is that no more than a quarter to a third of private landlords would be willing to consider letting to a household referred by the Council, whether the tenancy is to be managed directly through the landlord or through an agent or by the Council directly under the Private Sector Leasing scheme.

As such, it is clear that it will very often not be reasonably practicable to secure accommodation, sourced through private landlords/agents for households, within the borough.

Rather it will often be necessary, because of the realities of the housing market, to source accommodation considerable distances away from the borough necessitating rearranging of schools for children and of other arrangements e.g. health related services and treatment.

The Guidelines On The Allocation Of Temporary Accommodation

Explanatory notes:

These guidelines should be followed by staff when allocating/booking temporary accommodation for the placement of homeless households. They distinguish between priorities amongst descriptions of household circumstances to guide officers in deciding when to allocate temporary accommodation in borough, outside but close to the borough, further away from the borough but in London and outside of London if necessary.

These guidelines should not be followed blindly.

The golden rules are that, if accommodation in the borough is available, and if there is no known higher priority case for it, then the household being considered at the time should always be allocated that accommodation. If accommodation within the borough is not available, then accommodation should be allocated as close to the Borough as is available.

These guidelines should also be applied with reference to the individual circumstances of the household needing placement and the characteristics of the property or properties available for allocation to them.

Officers should use common sense when making allocations and not necessarily stick blindly to the following guidelines e.g. allocating a property just outside the borough where the household have good reason to prefer to be located in a part of the borough close to the (relevant) borough boundary, then out of borough accommodation may be a better allocation than in borough accommodation further away.

For example, if the household is from the Mortlake part of the council's district and have young children in schools in that area, an allocation of accommodation in the Wandsworth part of SW15 may be more preferable than in borough accommodation allocated in the Whitton area.

Bed and Breakfast and other emergency access accommodation	Where bed and breakfast or other non self-contained accommodation is all that is available officers should allocate in borough accommodation in all cases where such is available. Where in borough accommodation is not available officers should look to place as close to the borough as possible although these guidelines recognise that, for such emergency accommodation, choices are often extremely limited and entirely dependant on what is available on any given day or indeed any given hour of the day.
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Self-Contained Temporary Accommodation

Self-contained accommodation located within Richmond	<p>Priority will be given for:</p> <ul style="list-style-type: none"> • Families with children in education in the borough where those children are too young or otherwise unable to commute to school and back again unaccompanied. • Families with children in special educational learning in Richmond in the borough unless there are good reasons to place outside of the borough. • Families with a household member attending very regular outpatient or inpatient hospital treatment e.g. on a weekly or a fortnightly basis. • Families with children coming up to major nationally assessed examinations in particular GCSEs. • Families receiving very regular care from relatives/friends in the borough or providing very regular care to relatives/friends in the borough
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Self-contained accommodation located in boroughs adjacent to Richmond or otherwise in the SW London sub region	<p>Priority will be given for:</p> <ul style="list-style-type: none"> • Families with children presenting a mix between those able to commute to and from school accompanied and unaccompanied. • Families with regular attendance at hospitals located in the borough for outpatient treatment at a frequency of at least monthly. • Families with employment in the borough at irregular hours which makes travelling to and from the workplace by public transport very difficult.
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Self contained accommodation located elsewhere in London	<p>Priority will be given to:</p> <ul style="list-style-type: none"> • Families with children of an age able to commute to and from school unaccompanied. • Families with regular attendance at hospitals located in the borough for outpatient treatment at a frequency of greater than monthly. • Workless households.
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Self-contained accommodation out of London	<p>Priority will be given to:</p> <ul style="list-style-type: none"> • Families subject to the total welfare benefit cap where closer accommodation is not available.
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Approved on:	15th March 2018
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Effective from:	16th March 2018
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Review Date:	March 2022.
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Appendix 2. Strategy for Housing for Older People Evidence Base and Context

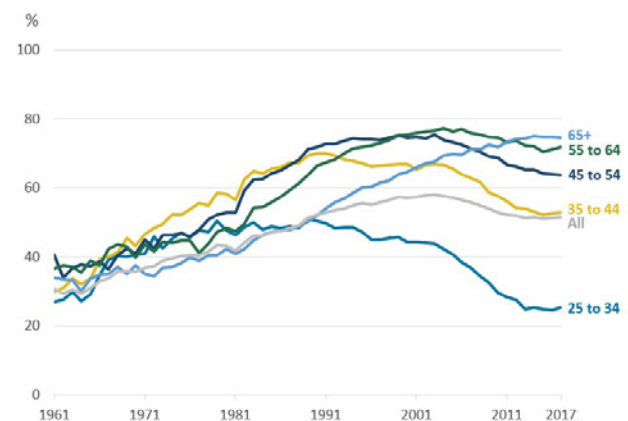
The UK population is ageing. In 2016, there were 11.8 million UK residents aged 65 years and over, representing 18% of the total population; 25 years before, there were 9.1 million, accounting for 15.8% of the population. It is projected that by 2066 there will be a further 8.6 million UK residents aged 65 years and over, taking the total number in this group to 20.4 million and making up 26% of the total population. The fastest increase will be seen in people aged 85 and over; in 2016 this age group made up 2% of the UK population, by 2066 it is expected that they will account for 7%.¹

Although the older population is not equally spread across the UK, with older people making up higher proportions of the populations of rural and coastal areas than urban areas, an impact will nevertheless be seen locally. Compared with London, LBRuT has fewer people aged 49 and under and a higher proportion of older people with data indicating that this trend is continuing; the 2011 Census found a 49% increase in people aged 60 – 64 compared to the 2001 Census. In LBRuT, those aged 65 and over accounted for 15% of the Borough’s population in 2016 and it is anticipated that this will rise to 21% by 2039. The 85+ age group is expected to increase by 14% by 2025 but then rapidly by 77% by 2035².

Older People and the Housing Market

Over three-quarters of households where the household reference person is aged 65 years and over are owner-occupiers, with the vast majority owning outright. While the percentage of these households has increased since 2008, the average age of first-time buyers has increased and home ownership rates have decreased among all generations below the age of 65 years, most sharply for those aged 25 to 34 and 35 to 44 years.

Figure 1: Families (singles or couples) owning their own home, by age group, 1961 to 2017, UK



Source: Housing data, Resolution Foundation (resolutionfoundation.org)

Households headed by someone aged 25 to 34 years are now more likely to be renting privately than buying with a mortgage. The decline in home ownership and increase in private renting among those aged under 65 suggests that in the future increasing numbers of retirees could still be paying off a mortgage or be renting.

The most recent Census found that 76% of older people in LBRuT own their own home, while 16% rent from a PRP and 7% either rent privately or live rent free. Older people are more likely to own their own home compared to the Borough average (69%) or to rent from a PRP compared to the Borough average (13%). Older people are much less likely to reside in the private rented sector compared to the Borough average (23%) although this still constitutes 1,238 older person households.

1 <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/ageing/articles/livinglongerhowourpopulationischangingandwhyitmatters/2018-08-13>

2 Subnational population projections for England: 2016-based; ONS, May 2018

National and Local Policy Context

The Care Act 2014 places a duty on local authorities to promote wellbeing and places an emphasis on the suitability of accommodation in doing so. Stable and secure housing can keep people healthy, allow swift return from hospital, enable rapid recovery from ill-health and encourage independent living. The Act also highlights the importance of collaborative working with partners and places duties on local authorities to carry out their care and support services with the aim of seeking out and joining-up services provided by the NHS with other related services including housing to promote a whole-systems approach to wellbeing. It calls for a shared vision and a culture of cooperation and coordination.

Health and Social Care Working Together: the national aspiration is for there to be a single effective delivery system for health and social care, which provides seamless support to vulnerable and unwell people and is person centred, complementary, avoids duplication, promotes self-care and preventative support and facilitates targeted intervention where it is needed most.

The **Better Care Fund (BCF)** is a key vehicle for delivering the integration of health and social care. It requires Clinical Commissioning Groups (CCGs) and local authorities in every area to pool budgets and to agree an integrated spending plan for how they will use their funding allocation. The process builds on Richmond's well-established joint working between health and social care and forms part of multiple initiatives working towards integration and transformation. The LBRuT BCF plan has been developed jointly between the council and CCG and aligns with the aims of the [South West London Sustainability Transformation Partnership](#) to strengthen established integrated commissioning programmes which are designed to prevent emergency admissions to hospitals and help reduce Delayed Transfers of Care from hospitals.

London Borough of Richmond upon Thames's [Market Position Statement 2018](#) sets out the adult social care and support market in the Borough, outlining demand and supply information and the Council's commissioning intentions. The Council is committed to stimulating an active, responsive and quality supply of services to meet the needs of adults with social care needs, offering service users real choice and control about how they are supported to meet their needs, and the expectation is that providers will offer flexible, responsive and innovative services. It sets out the strategic objectives of adults' social care commissioning as being: self-help, prevention and early intervention; enabling personalised support; integration and partnership working; capacity, diversity and sustainability; and quality and value for money.

The Council's Adult Social Services Department has five key priorities which are intrinsically linked with the way the Department works and delivering the key strategic objective of 'delivering the best for residents': promoting independence, health and wellbeing; enabling people to have choice and control and culturally responsive services; integrating services with partners delivers better outcomes for residents; proportionate and adaptable processes and interventions; and using local networks and community assets to build resilience.

Appendix 3. Equality Impact and Needs Analysis

Directorate	Housing and Regeneration
Service Area	Housing and Homelessness Strategy
Service/policy/function being assessed	Housing and Homelessness Strategy 2021 - 2026
Which borough (s) does the service/policy apply to	Richmond
Staff involved	Laura Hood/Keith Burnett /Martina Kane / Clare O'Connor
Date approved by Directorate Equality Group (if applicable)	
Date approved by Policy and Review Manager All EINAs must be signed off by the Policy and Review Manager	29.01.2020
Date submitted to Directors' Board	

Summary

Please summarise the key findings of the EINA.

Positive:

- The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, addressing housing market pressure and homelessness, ensuring good quality homes and supporting their needs.
- It is positive that there is not an issue with pregnant women or households containing dependent children being in B&B for longer than six weeks. This shows that temporary accommodation is appropriate for these households.
- According to the Census, 48% of residents in the Borough were married where 77.4% were homeowners, with or without a mortgage. Married people are more likely to be in a stable housing tenure.
- Lone female parents with dependent children made up 56% of accepted homeless cases. The measures in strategy will ensure that more homeless households are housed appropriately and there will be a greater emphasis on prevention.
- Additional resources will be secured to fulfil the new homelessness duties.
- To support victims of domestic violence, which disproportionately affects females, the Council will

continue to commission Refuge to operate two refuges in the borough. Additionally, SPEAR and Refuge will work jointly to provide a specialist refuge for rough sleeping women with complex needs. The Department is currently in the process of seeking Domestic Abuse Housing Alliance (DAHA) accreditation which recognises best practice in dealing with domestic abuse. DAHA's mission is to improve the housing sector's response to domestic abuse through the adoption of an established set of standards. Nationally there is a shortage of refuges for people fleeing domestic abuse and the upcoming Domestic Abuse Needs Assessment undertaken by Community Safety will include reviewing local refuge provision to understand whether need is currently met locally and to support any future funding bids in this area.

- A higher proportion of those with a long-term health problem or disability are homeowners than other groups, however a higher proportion also live in socially rented accommodation which could be due to difficulties accessing alternative forms of housing, such as the private rented sector. The strategy sets out the plan to deliver a programme of home adaptations to people with disabilities so that they can remain living independently.
- Homeless acceptances with a mental health issue as the main priority need reason, reduced by 67% between 2012/13 and 2016/17, from 39 to 11. However, priority need because of vulnerability due to mental ill health was the second most common category in 2019/20,

accounting for 21% of accepted cases. The Strategy sets out support for the further development of the mental health and learning disability accommodation pathway to ensure that suitable housing and support is available to meet people's needs. This includes supporting people to access the right accommodation at the right time to help them manage their mental health through the joint (Richmond and Wandsworth) Accommodation and Projects Team and by securing additional accommodation in the Borough for people with mental ill health. The Strategy also commits to the Council reviewing the mental health and hospital discharge protocols and ensure that effective joint working arrangements are in place.

- The 25-44 age group are overrepresented in homelessness acceptances in Richmond compared with the borough demographic. The strategy clearly sets out measures to tackle homelessness and continue to utilise the powers contained in the Homelessness Reduction Act to maximum effect. This includes: securing additional resources, working with partners to improve prevention, provide alternative housing solutions and to provide suitable accommodation for rough sleepers.
- Younger people are also less likely to be owner occupiers and more likely to rent privately. Therefore, they may find it harder to access homeownership and be at more risk of homelessness. The Council will maximise its resources and make best use of assets to deliver more affordable homes for residents on a range of incomes, including social rented, intermediate and other sub-market rent. The Strategy sets out approaches including the Development Delivery Agreement with Richmond Housing Partnership (RHP) which aims to deliver 180 affordable homes over the next five years.
- There were 175 new rough sleepers verified during 2019/20, an increase from 121 in 2018/19. Levels of rough sleeping both nationally and within London have increased significantly in recent years and the Strategy sets out the Council's commitments to continuing to provide a comprehensive rough sleeping service. The Strategy now includes a separate Rough Sleeping Strategy setting out how the Council will tackle rough sleeping through prevention, intervention and relief.
- The Temporary Accommodation Procurement and Allocation Guidelines 2018 has been included to ensure that procurement of temporary accommodation attempts to obtain accommodation in the Borough, or as close as possible to it. If accommodation within the Borough is

not available, then accommodation should be allocated in the neighbouring borough, where possible. Where demand outstrips supply, priority for accommodation in the borough will take into account households' individual circumstances. For example, families with children in education in the Borough where those children are too young or otherwise unable to commute to school and back again unaccompanied, or families with a household member attending very regular outpatient or inpatient hospital treatment. Priority for accommodation in a neighbouring borough will take into account families with children presenting a mix between those able to commute to and from school accompanied and unaccompanied or families with regular attendance at hospitals located in the borough for outpatient treatment at a frequency of at least monthly.

Negative:

- Data on sexual orientation is not reported in Government homelessness returns but it is collected by LBRuT. Of the cases between 2010/11 and 2015/16 where the lead applicant disclosed their sexual orientation, 94% of cases were listed as heterosexual, 3% as "other", 1% as bisexual and 2% as gay or lesbian. These figures were broadly in line with national statistics, such as the Integrated Household Survey which found that in 2014 93% of the British population identified as heterosexual, 1% as gay or lesbian, 1% as bisexual and 0.3% as "other"³. However, the question is not mandatory and applicants often do not complete the section. Measures will be implemented to ensure questions on housing and homelessness applications to the Council will be mandatory.
- Information in relation to the protected characteristics of religion and belief and gender identity is requested through the current online form. However, it is not mandatory; therefore, it is not robust enough to assess the impact of the Housing and Homelessness Strategy on these protected characteristics. Equality monitoring questions will be included in the new online application forms for homelessness and housing which will be mandatory (albeit they will include a 'prefer not to disclose' option).

3 ONS (2015) Sexual Identity by Region, UK. Available from: <http://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/referencetable04sexualidentitybyregionuk>

1. Background

Briefly describe the service/policy or function:

The Housing and Homelessness Strategy sets out the Council's priorities over a five year period. It focuses on four key themes which are:

- Addressing housing market pressures, preventing homelessness and increasing housing options: Homeless Strategy Objectives 2021 - 2026;
- Delivering affordable homes; new supply and redevelopment of existing social housing stock
- Ensuring good quality homes; providing choice, standards and quality for renters; and
- Support the needs of residents, working with care and support services to provide quality housing options.

**Theme One:
Addressing Housing
Market Pressure
and Homelessness:
Homelessness Strategy
2021-2026****Homelessness Prevention****Objectives:**

- Continue to successfully implement the Homelessness Reduction Act 2017 (HRA) developing a 'whole borough partnership' approach to make the aims of the Act a success locally.
- Significantly increase homeless prevention interventions and meet target reductions in use of temporary accommodation
- Provide alternative housing options and opportunities including in the private rented sector where homelessness cannot be prevented
- To establish improved links with landlords in the private rented sector with the aim of working together to prevent homelessness and increase housing options.

**Providing Appropriate
Accommodation****Objectives**

- Provide enhanced housing solutions for homeless households and those at risk of homelessness.
- Minimise the Council's use of temporary accommodation, reduce expenditure in this area and reinvesting in preventative services.
 - To provide suitable accommodation that meets the needs of the households and vulnerable groups, including rough sleepers.

**Supporting Vulnerable Groups,
including Rough Sleepers****Objectives:**

- Ensure vulnerable groups have access to support to maintain their tenancy through the Council's Resettlement Service
- Keep under review protocols relating to youth homelessness, monitoring these to ensure that they enable all statutory responsibilities to be met and appropriate accommodation and support is provided

Rough Sleeping Strategy

- Achieve a sustained reduction in the levels of rough sleeping
 - Work with voluntary and statutory partners to assist rough sleepers off the streets and into settled accommodation
 - Ensure the complex needs of rough sleepers are met through personalised support
-

**Theme Two:
Delivering Affordable
Homes; new supply and
redevelopment of existing
social housing stock**

Objectives:

- To work in partnership with PRPs, private developers and the GLA to support the development of new affordable homes
- Deliver a range of affordable homes that meet the needs of local residents and workers
- Maximise and make best use of financial assets and resources, both Council and PRPs, to deliver more affordable housing
- Through the Council's housing and planning policies seek to support PRP development to deliver 100% affordable housing schemes

**Theme Three:
Ensuring Good Quality
Homes – Providing Choice,
Standards and Quality for
Renters**

Objectives:

- To improve conditions in the private rented sector
- Continue to prioritise fire safety
- To secure the efficient use of existing social housing stock
- Ensure the Housing needs of Gypsy & Travellers continue to be assessed and met through well-managed licenced sites
- To improve housing management standards for residents in PRP accommodation through the work of the Tenants' Champion.

**Theme Four:
Supporting the needs
of residents**

Objectives:

- Ensure residents affected by welfare reform have access to appropriate support
 - Reduce fuel poverty for low income and vulnerable households
 - Ensure that appropriate housing and support is available to enable older people and people with disabilities to maintain their independence.
 - Support opportunities which will improve the housing offer for older people which meets evidenced need, including tenure and level of support
 - Support the development of housing and an accommodation pathway that meets the needs of people with learning disabilities and mental ill health
 - Ensure that children and care leavers have access to appropriate support and housing that meets their needs
 - Achieve DAHA accreditation
 - To ensure the Council and partner PRPs play an active role in promoting the safeguarding of children and adults from harm
-

2. Analysis of need and impact

Please note: much of the analysed data is from 2016/17 whereas the summary above uses more recent data. As per the advice of the Policy and Reviews Manager, the 2018 EINA has been updated only in places where material changes arising from the Strategy have had an impact.

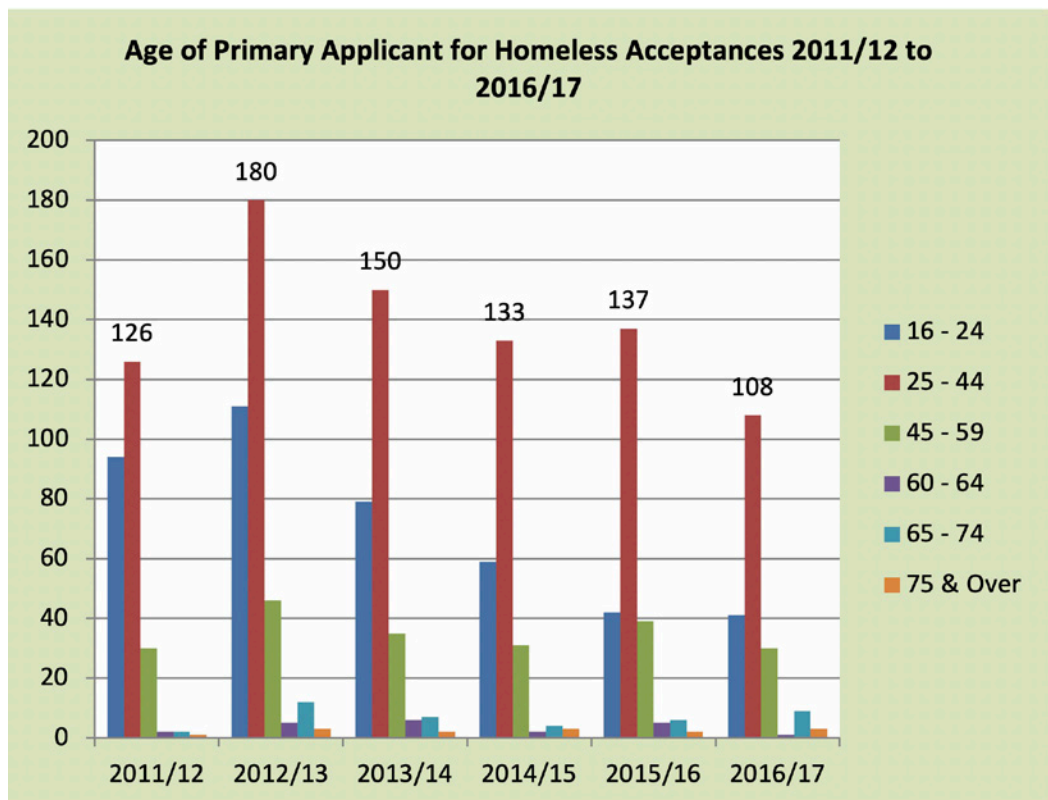
Protected group Findings

Age

Census 2011:

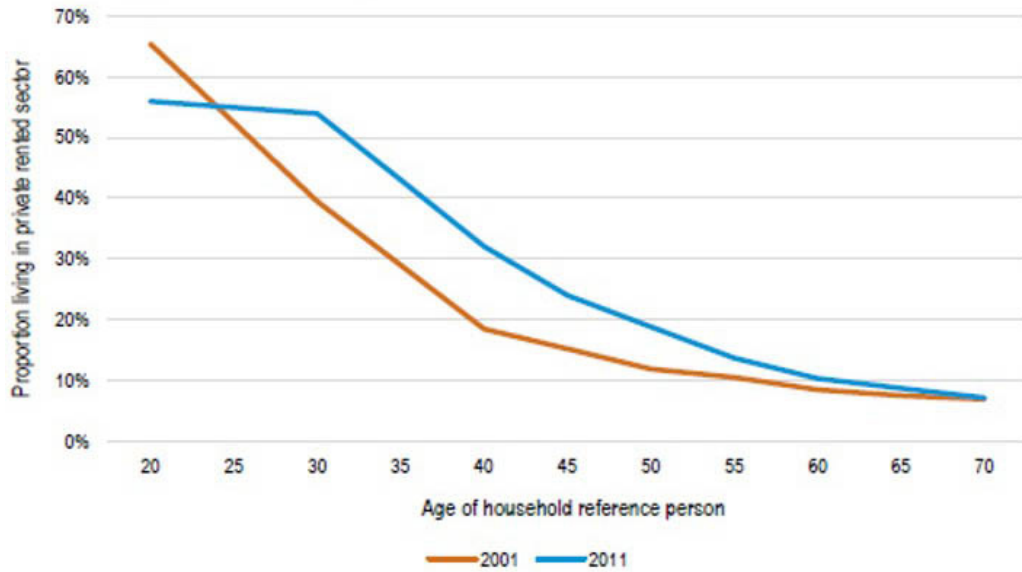
Age	Percent
0-20	24%
21-30	12%
31-40	18%
41-50	16%
51-60	11%
61+	17%

P1E Homelessness Returns:



In 2015/16, there were 108 homelessness acceptances from the 25-44 age group, accounting for 56% of those accepted as homeless which is higher than the borough demographic. The 16-24 age group, accounted for 21% of acceptances, followed by 16% in the 45-59 age group. The number and proportion of accepted cases aged 16-24 has fallen year-on-year since 2012/13.

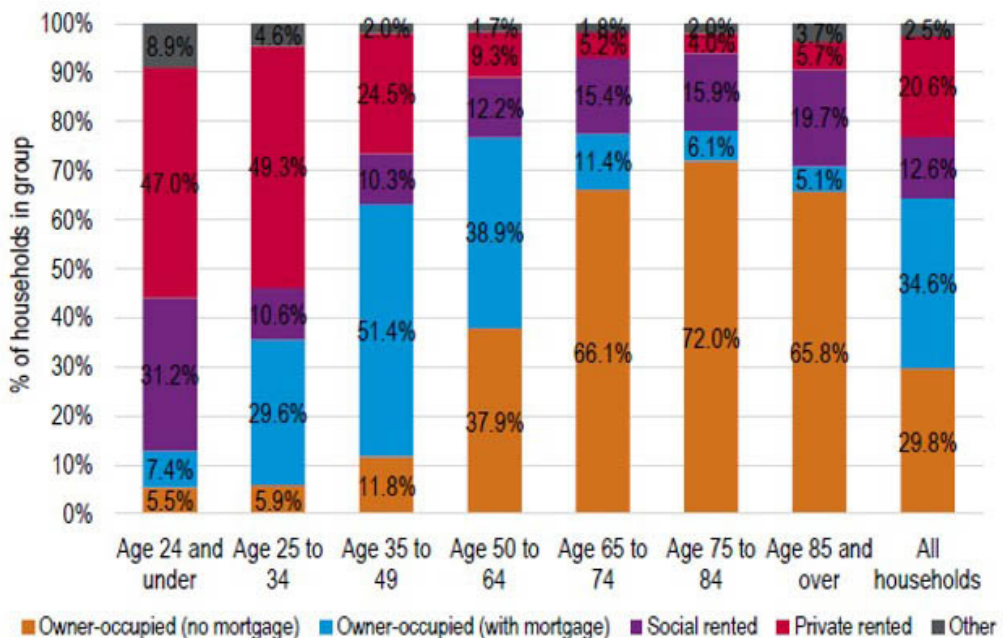
**Strategic
Housing Market
Assessment
(SHMA):**



Source: Census (2001 (Table S013) and 2011 (DC4201EW))

Younger people are less likely than older residents to be owner occupiers and are more likely to live in the private rented sector or with family or friends. This, in turn, means that they are at higher risk of homelessness as the top three reasons for homelessness in 2015/16 were the ending of an AST tenancy (private sector), parents no longer willing to accommodate and other friends or relatives no longer willing to accommodate. Additionally, people are renting in the private rented sector for longer and into older age.

**SHMA: Housing
tenure by age
range Census
2011**



Age of Rough Sleepers 2016/17

Age	Richmond upon Thames 2016/17	Outer London Average 2016/17
18-25	12%	9%
26-35	24%	25%
36-45	24%	30%
46-55	31%	25%
55+	9%	12%

Table 8, Source: CHAIN data. Rounded up or down to nearest %

The highest proportion of rough sleepers in 2016/17 were aged 46-55 age, at 31%. This is higher than the outer London average and is followed by those aged 36-45 and 26-35, each accounted for 24% of rough sleepers. Additionally, 9% of rough sleepers were aged over 55.

Disability

Census 2011

People Permanently Sick or Disabled (2011)

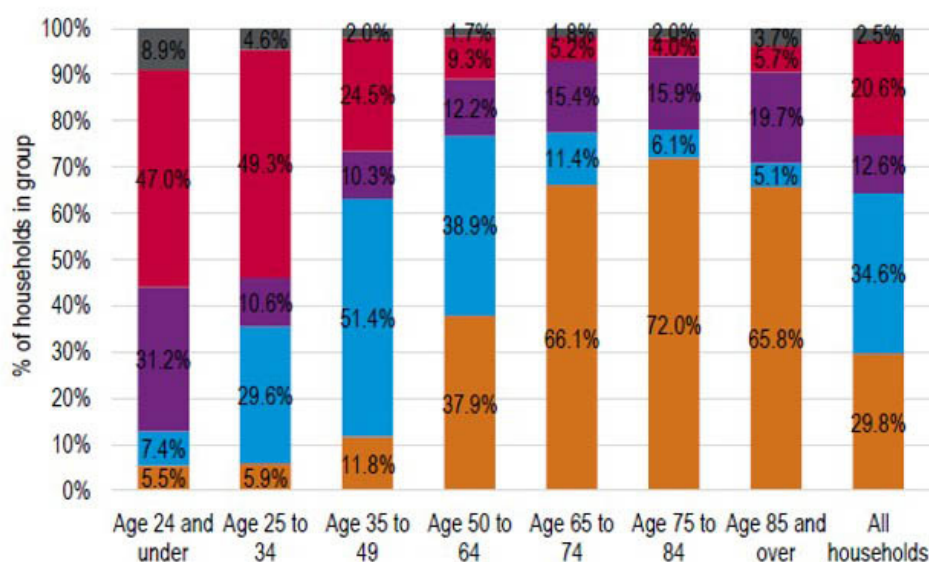
People Permanently Sick or Disabled (% of all aged 16-74 (2011))

2,802

2.03%

The 2011 Census also identified that 11.5% of the population of the Borough indicated that they had a long-term health problem or disability that affected their day-to-day life.

SHMA: People with a Long-term Health Problem or Disability (LTHPD)



People with LTHPD are significantly more likely to be an owner occupier without a mortgage or live in social housing than be an owner-occupier with a mortgage. This could be due to an older home owning demographic in Richmond whom are more likely to have long-term health problems. The higher proportion of social renters with LTHPD could be due to difficulties accessing alternative forms of affordable or accessible housing tenure.

P1E Homelessness Returns:

There were 33 accepted homeless cases in 2015/16 found to be in priority need due to having a physical disability or mental health issue. They account for 17% of homeless acceptances for the year. Of these 11 were due to mental illness or disability and 22 for physical disabilities.

Homeless acceptances with a mental health issue as the main priority need reason, reduced by 67% between 2012/13 and 2016/17, from 39 to 11. However, priority need because of vulnerability due to mental ill health was the second most common category in 2018/19, accounting for 33 cases (31% of accepted cases). Estimates of those with mental health issues within the Borough⁴ indicate that the proportion of accepted homeless households with mental health issues stated as priority need, was higher than the estimated 20% of the population in the borough with a mental health issue.

Gender (sex)

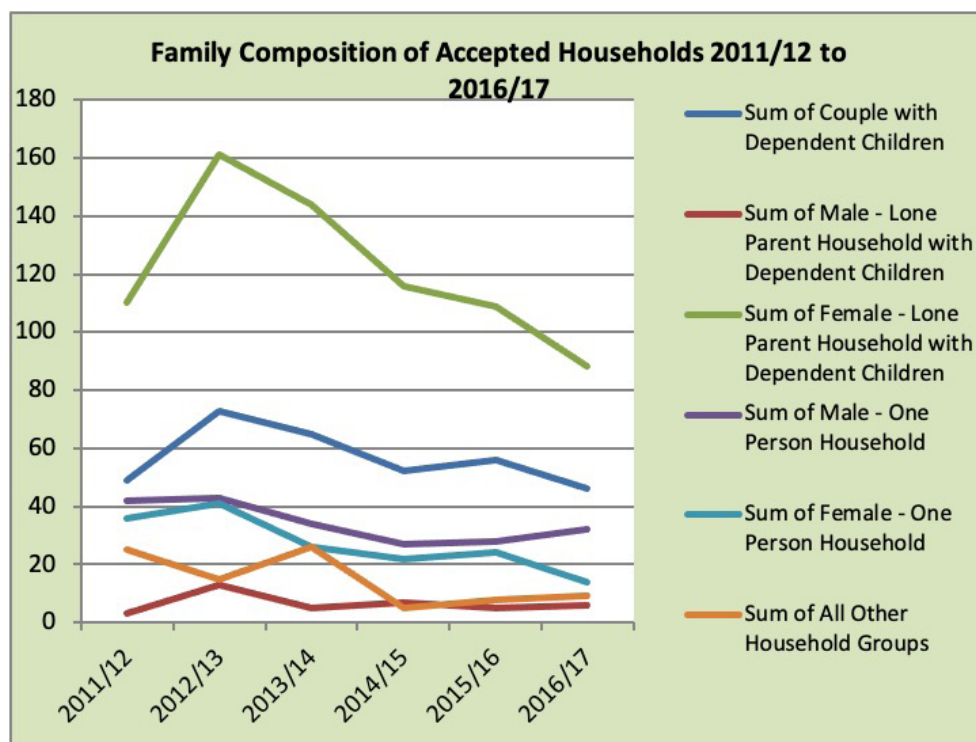
Census 2011

Male	Female
49% (91,149)	51% (95,849)

Single parent households

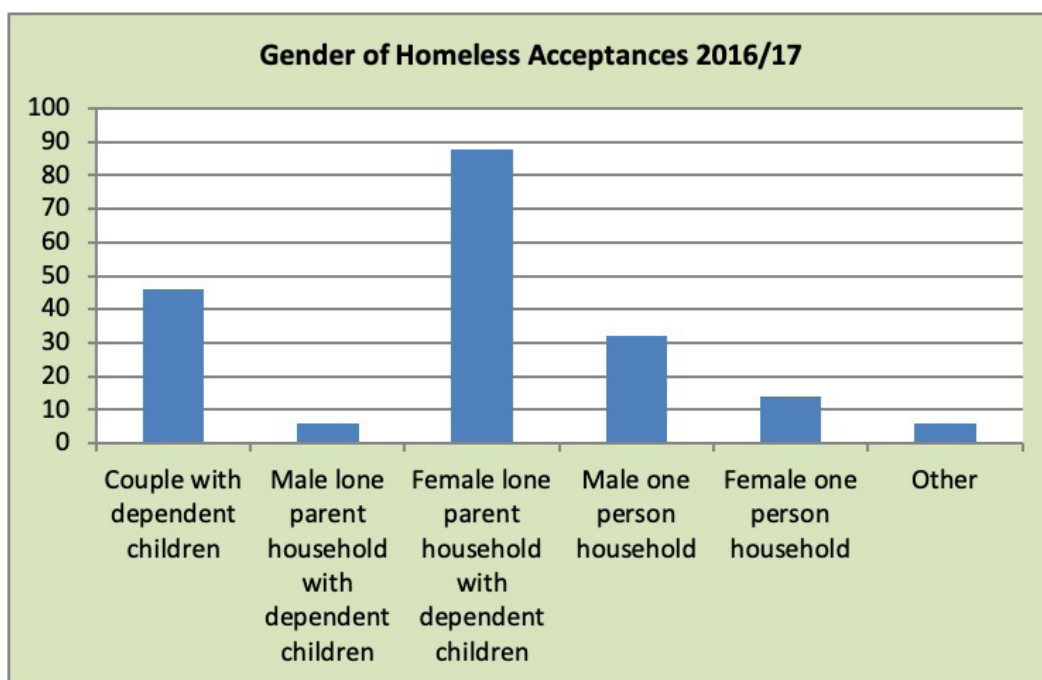
Lone Parent Households 2011 Census		
Single Parent H/Hold Male	365	0.46%
Single Parent H/Hold Female	3,503	4.40%
Total Richmond Households	79,800	100%

P1E Homelessness Returns:



When comparing the household composition of accepted households, Richmond is similar to the London as a whole. For example, in London in Q4 2016/17, lone female parents with dependant children made up 51% of accepted homeless cases compared to 56% in Richmond. Similarly, couples with children make up the second largest group in both Richmond and in Greater London.

⁴ <http://www.datarich.info/resource/view?resourceId=331> Estimated 20,000 residents (2010)



Among homeless households demand for two bedroom accommodation is highest, with 60% of accepted homeless applicants registered on the housing queues as at October 2017 awaiting this size of accommodation. This should be borne in mind when considering how to maintain access to the Private Rented Sector and to make best use of social stock in the Borough, for example through facilitating moves which free-up this size of accommodation. However, Richmond historically has a higher proportion of bedsit and one bedroom Registered Provider stock, meaning that the delivery of larger family sized accommodation also remains an important balancing priority. Additionally, 28% of homeless applicants require three or more bedroom homes.

Data from the P1E returns shows that women were more likely than men to be accepted as statutorily homeless. 46% of homeless acceptances in 2016/17 were from households classified as female lone parents with dependent children whilst 7% were from female one person households. In comparison, only 3% of homeless acceptances were from male lone parents with dependent children and 17% from male one person households. These findings represent a common trend where lone female parents become the primary carers for dependent children after relationship breakdowns.

Domestic Violence

Homeless acceptances from those whose primary reason for homelessness is violent relationship breakdown involving a partner range from 8% in 2010/11 rising to 12% of acceptances in 2012/13 before declining to 7% of acceptances in 2015/16. This equated to 12 acceptances in 2010/11 rising to 42 in 2012/13 and 16 in 2015/16. It is well documented that those using homelessness services due to violent relationship breakdown are predominantly female which is disproportionate to the borough profile.

Gender Identity

Joint Strategic Needs Assessment 2014

The number of people presenting to health services and Gender Identity Clinics for gender dysphoria is growing rapidly – an estimated 15-20% increase per annum. This is thought to be due to a number of factors including increased public awareness and knowledge, NHS provision of services, legislative changes, mutual support within the growing Transgender community and more respectful press coverage. Using the 2009 Gender Identity Research and Education Society (GIRES) incidence estimate and predicted growth, incidences in 2013 of presenting would be roughly 6 per 100,000 aged 15 and over per year.

Assuming uniform distribution of individuals geographically, there may be between 16 and 39 people with gender dysphoria in Richmond Borough, and the potential for 12 presentations for treatment in 2013 in those over 15 years old.

There is little information on gender reassignment amongst those using homelessness services in Richmond.

The previous review identified that collecting information on transgender residents using homelessness services was an issue and the facility is available for the collection of this data. However, the information collected is not statistically significant as a large proportion of applicants did not answer this question. A new online form is currently in its testing stages and, once live, this data will be collected and reported on.

Marriage and civil partnership

Census 2011

Marriage and Civil Partnerships in Richmond upon Thames	
Status	Percentage of Population
Single	37%
Married	48%
Divorced	8%
Separated	2%
Widowed	5%

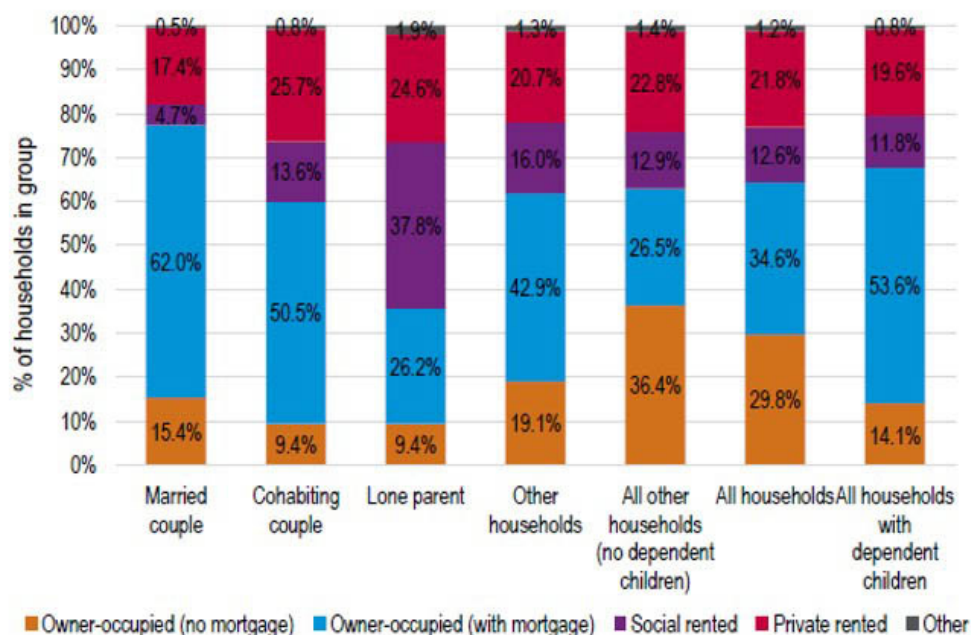
In addition to the information above, 665 residents (0.44% of those eligible) responded as being in a registered same sex civil partnership.

P1E Homelessness Returns:

The 2011 Census provides the number and percentage of residents who are married or in a Civil Partnership. According to this data, 48% of residents were married in Richmond.

24% of accepted homeless households in 2015/16 were a couple with dependent children which is lower than the borough profile. Therefore, it is likely that the percentage of married and civil partnership homeless households is also lower than the borough profile as the majority of homeless acceptances are single parents with dependent children or vulnerable single person households.

Figure 60: Tenure of households with dependent children – Richmond-upon-Thames



Source: 2011 Census

In Richmond, married couples are most likely to be an owner occupier with and without a mortgage at 77.4% which is a higher proportion than the demographic of the borough. They are also less likely to live in socially rented accommodation out of all of the groups. Conversely, lone parents are less likely to own property and are most likely to live in social housing.

Pregnancy and maternity

P1E Statistics

Priority Need Category	London %	SLP+LBW %	LBRuT %
Household includes, a pregnant woman and there are no other dependent children	6%	5%	10%

ONS birth summary statistics

In 2012, there were 2,916 live births to women living in Richmond. The live birth rate was 72 per 1,000 women aged 15-44 years in the borough which is predicted to remain fairly stable over the next ten years.

P1E Homelessness Returns:

10% (23) of acceptances in 2015/16 were found to be in priority need as the household included a pregnant woman where there were no other dependent children in the household. This is higher than 6% in London and 5% for the South London Partnership plus Wandsworth boroughs.

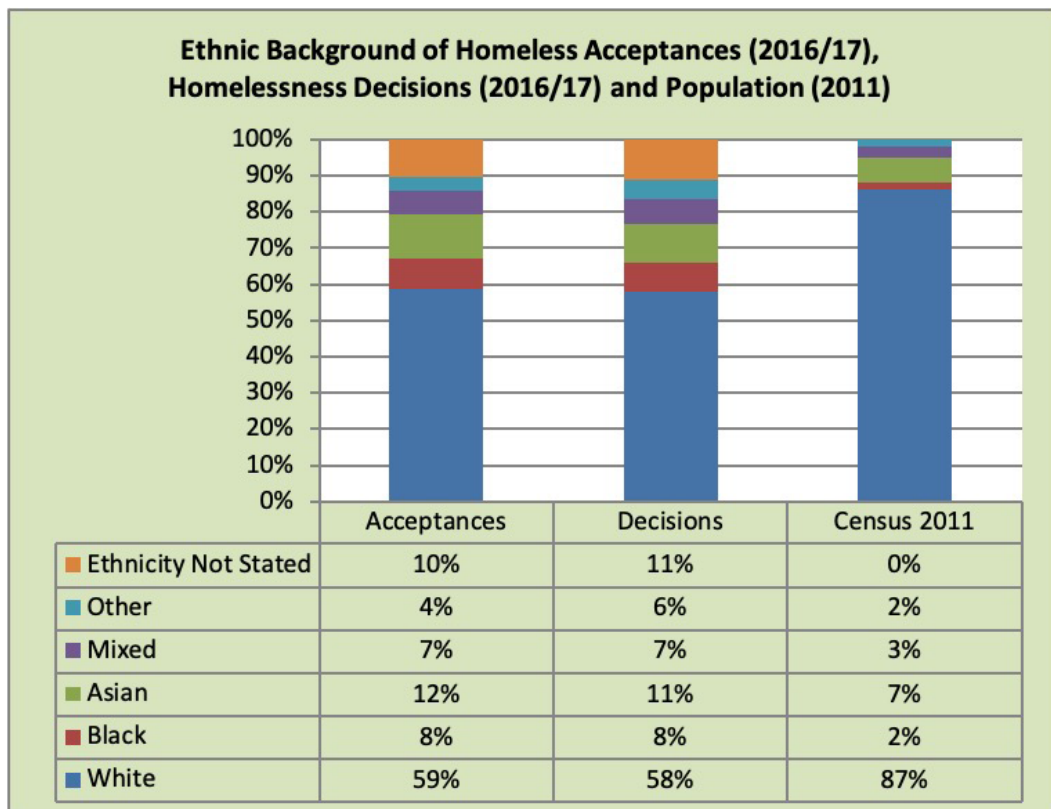
Race/ethnicity

Census 2011

	Richmond upon Thames	England	London
White	86%	86%	60%
Black	2%	3%	13%
Asian	7%	8%	18%
Mixed	4%	2%	5%
Other	2%	1%	3%

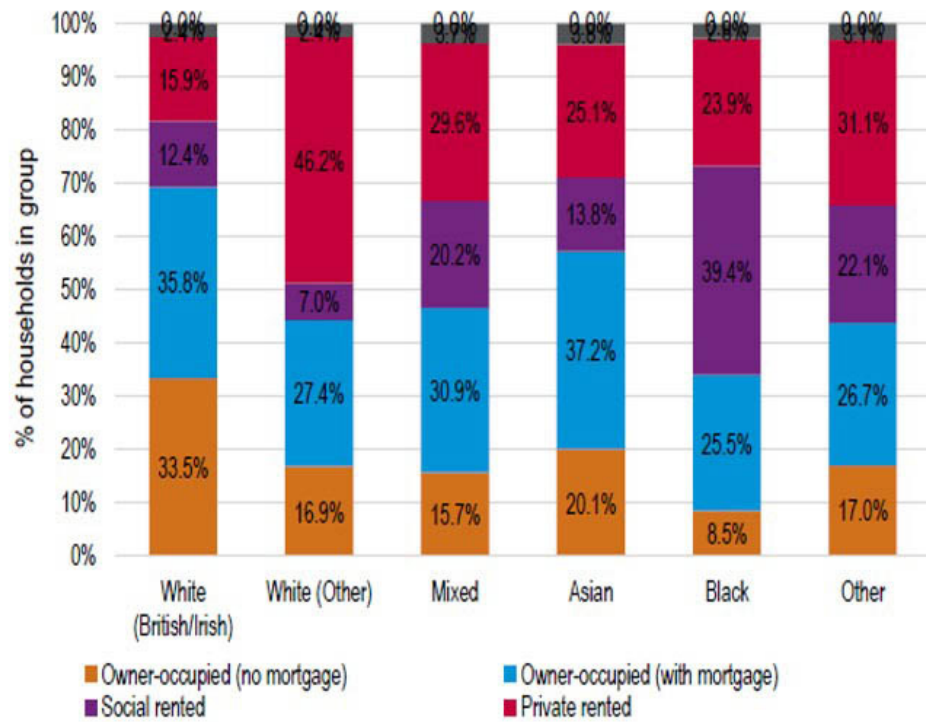
Census 2011:

Source, P1E Returns 2015/16 and Census 2011



Households from a BME background were overrepresented in the cases accepted as homeless in LBRuT with 31% of homelessness acceptances being from individuals with a BME background in 2016/17. This is also the case across London where, in 2016/17, on average 60% of all homeless acceptances were from applicants identifying as from a BME background. Black households in particular were significantly overrepresented; 2011 Census data shows that 2% of the Borough's population identifies as Black compared to 8% of homelessness decisions and 8% of acceptances made in 2016/17.

Figure 58: Tenure by ethnic group – Richmond-upon-Thames



A higher proportion of those in the white British ethnic group are owner occupiers and are least likely to live in social housing. Those in the white other group rent privately than other ethnic groups. BAME groups are more likely than other ethnic groups to live in socially rented accommodation.

BAME households are also less likely to be owner occupiers and therefore more likely to be privately renting or living with friends or family.

There is a lot of research already available as to why BAME residents are over-represented in homelessness acceptances. The main issues are socio-economic such as housing affordability, larger families combined with lower homeownership levels in the borough and living in the private rented sector placing BAME families at more risk of homelessness. Research that explore these issues in more depth can be found in the [Strategic Housing Market Assessment 2016](#) (section 10) which informed the Local Plan review which includes level of new build affordable housing and the Homelessness Review which identifies homelessness issues.

Religion and belief, including non belief

Census 2011

Religion/Belief	%
Christian	55%
Buddhist	1%
Hindu	2%
Jewish	1%
Muslim	3%
Sikh	1%
Other Religion	0%
No Religion	28%
No Religion Stated	8%

LBRuT requests information on religion and belief when service users apply for housing or use homelessness services. However, the question is not mandatory and is not reliable to measure the impact of the Strategy. A new homeless application online form is currently in its testing stages and, once live, this data will be collected and reported on.

Sexual orientation

The 2011 census did not have a specific question regarding sexual orientation. Data on sexual orientation is not reported in the P1E Returns but is collected by Richmond. Of the cases between 2010/11 and 2015/16 where the lead applicant disclosed their sexual orientation, 94% of cases were listed as heterosexual, 3% as “other”, 1% as bisexual and 2% as gay or lesbian. These figures were broadly in line with national statistics, such as the Integrated Household Survey which found that in 2014 93% of the British population identified as heterosexual, 1% as gay or lesbian, 1% as bisexual and 0.3% as “other”⁵.

The data on homelessness cases in the Borough is not comprehensive. LBRuT request information on sexual orientation. However, for 69% of homelessness decisions between 2010/11 and 2015/16, sexual orientation was not recorded as the question is optional and was not completed by the user. There have been so few cases recorded, it is difficult to identify trends in the homelessness cases where a decision has been made. A new online homeless application form is currently in its testing stages and, once live, this data will be collected and reported on.

National research indicates that younger LGBT people were at greater risk of homelessness whilst living in the family home as a result of their sexuality. This is because research suggests that individuals ‘coming out’ to family members can cause tension in the family and some evidence suggests this leads to this group being overrepresented amongst homelessness cases⁶.

In November 2017, the LGBT Forum raised the issue of young LGBT+ people being unable to access social housing as they are highly mobile within London and would struggle to meet the local connections criteria. The Strategy does not impact on housing allocation policy however this may link to homeless amongst the younger LGBT+ community.

5 ONS (2015) Sexual Identity by Region, UK. Available from: <http://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/referencetable04sexualidentitybyregionuk>

6 NIESR (2016) Inequality among lesbian, gay bisexual and transgender groups in the UK: a review of evidence. Available from: http://www.niesr.ac.uk/sites/default/files/publications/160719_REPORT_LGBT_evidence_review_NIESR_FINALPDF.pdf

Data gaps.

Data gap(s)	How will this be addressed?
There are data gaps for the following protected characteristics: sexual orientation, gender reassignment and religion and belief.	The information on these protected characteristics is currently requested by LBRuT in relation to housing and homelessness applications. However, they are optional and service users often do not provide the information and as such at present it is not collated and reported on. A new online homelessness application form is currently being tested; this will include questions on these protected characteristics as mandatory (albeit with a 'prefer not to disclose' option) and once this is live this data will be collated and reported on as part of the Council's H-CLIC data return. .

3.Impact

Positive	Negative
Protected group : Age	
The 25-44 age group are overrepresented in homelessness acceptances in Richmond compared with the borough demographic. The strategy clearly sets out measures to tackle homelessness and continue to embed the Homelessness Reduction Act to maximum effect. This includes: securing additional resources, working with partners to improve prevention, provide alternative housing solutions and to provide suitable accommodation for rough sleepers. Positively, during the first full year of the Act the Council was successful in preventing homelessness for 155 households (across a range of ages etc) and the Strategy sets out how it will build on this new focus on preventative early intervention going forward.	
Younger people are also less likely to be owner occupiers and are more likely to rent privately. Therefore, they may find it harder to access homeownership and be at more risk of homelessness. The Council will maximise its resources and make best use of assets to deliver more affordable homes for residents on a range of incomes, including social rented, intermediate and other sub-market rent. The Strategy sets out approaches including the Development Delivery Agreement with Richmond Housing Partnership (RHP) which aims to deliver 180 affordable homes over the next five years.	

Positive**Negative**

Rough sleepers in Richmond in 2016/17 aged 46-55 were in a higher proportion than the Outer London average. The Council will maintain and, where possible, enhance a well developed rough sleeper service. The Strategy sets out the Council's commitments to continuing to provide a comprehensive rough sleeping service. The Strategy now includes a separate Rough Sleeping Strategy setting out how the Council will tackle rough sleeping through prevention, intervention and relief.

The strategy sets out a range of measures which will help residents in all age groups. It aims to deliver affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of vulnerable residents. The Tenancy Policy 2019 directs Private Registered Providers to offer tenancies of at least ten years, to ensure that the Borough's social tenants have a reasonable degree of security. In addition, the Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually.

This includes an improved housing offer for older people, including those with care and support needs. Compared with London, LBRuT has fewer people aged 49 and under and a higher proportion of older people with data indicating that this trend is continuing; the 2011 Census found a 49% increase in people aged 60 – 64 compared to the 2001 Census. In LBRuT, those aged 65 and over accounted for 15% of the Borough's population in 2016 and it is anticipated that this will rise to 21% by 2039. The 85+ age group is expected to increase by 14% by 2025 but then rapidly by 77% by 2035⁷. The Strategy outlines the Council's approach to meeting the housing needs of older people, emphasising that development should be based on evidenced needs in order to ensure that there is appropriate provision of different supported housing products of different tenures to best meet the needs of the Borough's older population. The Strategy also includes the commitment to exploring the possibility of working with local Almshouse charities to increase the provision of housing for older people.

The Temporary Accommodation Procurement and Allocation guidelines 2018 takes into account the needs of young children in school or those taking nationally assessed examinations in particular GCSEs, who may need to stay in or close to the borough in order to cause the least disruption, when allocated temporary accommodation.

7 Subnational population projections for England: 2016-based; ONS, May 2018

Positive

Negative

The [Local Plan](#) sets out how the key issues facing the Borough will be delivered including around affordable housing. The Housing and Homelessness Strategy sets out in Themes one, two and four how it plans to address these issues.

- Theme One: Addressing housing market pressures, preventing homelessness and increasing housing options: Homelessness Strategy Objectives 2021– 2026
- Theme Two: Delivering affordable homes; new supply and redevelopment of existing social housing stock
- Theme Four: Supporting the needs of residents, working with care and support services to provide quality housing options

Protected group: Disability

A higher proportion of those with a LTHPD are homeowners than other groups. However, a higher proportion also live in socially rented accommodation which could be due to difficulties accessing alternative forms of housing or accessible homes, such as the private rented sector. The strategy sets out the plan to deliver a programme of home adaptations to people with disabilities so that they can remain living independently. It also sets out its support of the development and implementation of mental health and learning disability accommodation pathways.

Homeless acceptances with a mental health issue as the main priority need reason, reduced by 67% between 2012/13 and 2016/17, from 39 to 11. However, priority need because of vulnerability due to mental ill health was the second most common category in 2018/19, accounting for 33 cases (31% of accepted cases). Estimates of those with mental health issues within the Borough⁸ indicate that the proportion of accepted homeless households with mental health issues stated as priority need, was higher than the estimated 20% of the population in the borough with a mental health issue.

The Strategy sets out support for the further development of the mental health and learning disability accommodation pathway to ensure that suitable housing and support is available to meet people's needs. This includes supporting people to access the right accommodation at the right time to help them manage their mental health through the joint (Richmond and Wandsworth) Accommodation and Projects Team and by securing additional accommodation in the Borough for people with mental ill health. The Strategy also commits to the Council reviewing the mental health and hospital discharge protocols and ensure that effective joint working arrangements are in place.

8 <http://www.datarich.info/resource/view?resourceId=331> Estimated 20,000 residents (2010)

Positive**Negative**

The strategy sets out a range of measures to deliver affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of vulnerable residents. This includes an improved housing offer for disabled people through increased housing provision and, to establish the Joint Control Room across Richmond and Wandsworth, providing the 24-hour Careline service.

The Temporary Accommodation Procurement and Allocation guidelines 2018, takes into consideration those who receive regular inpatient or outpatient hospital appointments or receive regular care and need to stay in or as close to the borough as possible, when allocating temporary accommodation. Theme Four sets out the Councils plan for delivering a programme of home adaptations to people with disabilities so that they can live independently. Disabled Facilities Grants (DFG) can also be used to help with relocation provided that it is reasonable and practicable.

Protected group: Gender (sex)

Lone female parents with dependent children made up 56% of accepted homeless cases. The measures in the Strategy will ensure that more homeless households are housed and there will be a greater emphasis on prevention.

To support victims of domestic violence, which disproportionately affects females, the Council will continue to commission Refuge to operate two refuges in the borough. Additionally, SPEAR and Refuge will work jointly to provide a specialist refuge for rough sleeping women with complex needs for whom traditional refuge accommodation would not be suitable. The Department is currently in the process of seeking Domestic Abuse Housing Alliance (DAHA) accreditation which recognises best practice in dealing with domestic abuse. DAHA's mission is to improve the housing sector's response to domestic abuse through the adoption of an established set of standards. Nationally there is a shortage of refuges for people fleeing domestic abuse and the upcoming Domestic Abuse Needs Assessment undertaken by Community Safety will include reviewing local refuge provision to understand whether need is currently met locally and to support any future funding bids in this area.

Positive**Negative**

The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of vulnerable residents. . The Tenancy Policy 2019 directs Private Registered Providers to offer tenancies of at least ten years, to ensure that the Borough’s social tenants have a reasonable degree of security. In addition, the Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually.

Protected group: Gender Identity

The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of the borough’s residents. The Tenancy Policy 2019 directs Private Registered Providers to offer tenancies of at least ten years, to ensure that the Borough’s social tenants have a reasonable degree of security. In addition, the Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually.

Information is limited on the transgender population in the borough in relation to housing and homelessness. The Council will improve its collection of data to ensure that better information is collected in the future, so that accurate equalities information is held to identify the impact on gender identity. The new online homelessness application form will include questions on protected characteristics which will need to be completed (although there will be a ‘do not wish to disclose’ option) and, once this is live later in the year, this data will be collected and reported on as standard.

Protected group: Marriage and civil partnership

According to the Census 2011, 48% of residents in the Borough were married where 77.4% were homeowners, with or without a mortgage. This shows that married people are more likely to be in a stable housing tenure.

The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the need of the borough’s residents. The Tenancy Policy 2019 directs Private Registered Providers to offer tenancies of at least ten years, to ensure that the Borough’s social tenants have a reasonable degree of security. In addition, the Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually.

In 2015/16, 24% of accepted homeless households were a couple with dependent children. Therefore, it is likely that the percentage of married and civil partnerships approaching as homeless is also lower than the borough profile.

Positive**Negative****Protected group: Pregnancy and maternity**

10% of homelessness acceptances in 2015/16 were found to be in priority need as the household included a pregnant woman and there were no other dependent children in the household. The increased emphasis on prevention in the Homelessness Reduction Act and other measures will help to meet the need of pregnant women.

There is not an issue in Richmond with pregnant women or households containing dependent children being in B&B for longer than six weeks. This shows that temporary accommodation is appropriate for these households.

The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the needs of vulnerable people.

The Tenancy Policy 2019 directs Private Registered Providers to offer tenancies of at least ten years, to ensure that the Borough's social tenants have a reasonable degree of security. In addition, the Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually.

Protected group: Race/ethnicity

Households from a BAME background were overrepresented in accepted homeless cases at 31%, despite only representing 15% of the borough population, according to the 2011 Census. In addition, BAME households are also less likely to be owner occupiers and are more likely to be privately renting or living with friends or family. This could be due to difficulties accessing affordable housing and places them at increased risk of homelessness due to tenure security.

Black ethnic group households were significantly overrepresented in the proportion of acceptances. 2% of the Borough's residents identify themselves as black but formed 8% of acceptances in 2015/16.

The percentage of households accepted as homeless in 2015/16 that identify as Asian, were slightly overrepresented at 10% compared with the borough profile of 7%. Nearly two-thirds (63%) of Asian households for which there were homelessness decisions were aged 25-44 and 24% were aged 45-59.

Positive**Negative**

The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the needs of vulnerable people. The Tenancy Policy 2019 directs Private Registered Providers to offer tenancies of at least ten years, to ensure that the Borough's social tenants have a reasonable degree of security. In addition, the Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually. These measures will have a positive impact on those in the BAME ethnic groups.

Protected group: Religion and belief, including non belief

The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the needs of vulnerable people. . The Tenancy Policy 2019 directs Private Registered Providers to offer tenancies of at least ten years, to ensure that the Borough's social tenants have a reasonable degree of security. In addition, the Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually. The measures will have a positive impact for people of any religion and belief.

Information is limited on religion and belief in relation to housing and homelessness. The Council will improve the collection of data to ensure that better information is collected to accurate the impact on those with this protected characteristic. A new online form is currently in its testing stages and, once live, this data will be collected and reported on.

Protected group: Religion and belief, including non belief: Sexual orientation

National research indicates that younger LGBT people were at greater risk of homelessness whilst living in the family home as a result of their sexuality. The Strategy sets out how LBRuT will provide increased support to prevent and relieve homelessness which will help younger LGBT+ people.

The strategy sets out a range of measures which will improve the housing offer to residents by delivering additional affordable housing, increase new supply and redevelopment of social housing. It also seeks to address housing market pressures and homelessness, ensure good quality homes, provide housing options and support the needs of vulnerable people. The Tenancy Policy 2019 directs Private Registered Providers to offer tenancies of at least ten years, to ensure that the Borough's social tenants have a reasonable degree of security. In addition, the Council expects PRPs to ensure that affordable housing rents in LBRuT are set with regard to the London Affordable Rent levels approved by the Greater London Authority (GLA) annually. The measures will have a positive impact for people of any sexual orientation.

Information is limited on sexual orientation in relation to housing and homelessness. The Council will improve the collection of data to ensure that better information is collected to accurate the impact on those with this protected characteristic. A new online form is currently in its testing stages and, once live, this data will be collected and reported on.

4. Actions

Action	Lead Officer	Deadline
Ensure that information on protected characteristics is collected for homelessness applications when the new online form comes into effect.	Laura Hood	June 2020

5. Consultation. (optional section– as appropriate)

Where a significant change is proposed to a service or where a new policy/service/service specification is being developed it is best practice to consult on the draft findings of an ENIA in order to identify if any impact or need has been missed.

Appendix 4. Policy Statement regarding HMO Enforcement in the Private Rented Sector February 2021

1. Introduction

- 1.1 Nearly a quarter (circa 17,440) of households responding to the 2011 census, within the London Borough of Richmond upon Thames, stated they rent their homes from a private landlord. Of these rented properties, a mixture of different tenure can be observed from single occupancy through to HMOs.
- 1.2 HMOs can either be:
 - a. A 'standard' HMO; whereby three or more people (comprising more than 1 household) are occupying a property and sharing bathroom, toilet or kitchen facilities; or
 - b. Where a property is occupied by five or more tenants (comprising more than 1 household) who are sharing facilities, it is deemed a 'large' HMO and requires a licence from the Council.
- 1.3 Within either definition, HMOs represent a key element of tenure mix within the housing market for a multitude of tenants within varying demographics. For some, such as single tenants under 35 years of age and in receipt of housing benefit; a room within a shared property remains their sole entitlement within the terms of their benefit claim.
- 1.4 All HMOs are required to meet mandatory standards for safety, repair and maintenance of gas, electrics, water and other structural elements of the building. These aspects form a central part of a detailed inspection by a qualified Environmental Health Officer (EHO) from the Regulatory Services Partnership (RSP) in respect of the health and safety of the property.
- 1.5 Local authorities may also attach discretionary conditions as they see fit in the case of licensed HMOs; such as the need to control or prohibit parts within the house for the purposes of addressing antisocial behaviour or safety. This does not extend to beyond the boundaries of the property.
- 1.6 Typically where problematic properties are encountered, associated with antisocial behaviour (i.e.: linked to an HMO), the best recourse is for a multiagency approach to be adopted in partnership with the landlord in question. This would involve a variety of stakeholders such as the police, fire, environmental health, social services, commercial partners or interested parties in the property; to establish best practice and set out the manner in which the property should be managed.
- 1.7 All HMO licences are for a duration of five years and are issued (or revoked) under delegated authority by the Council's private sector housing team. The licensee is subject to meeting the fit & proper person test and ensuring elements such as room size and occupancy standards are adhered to. A fee covers the costs incurred for the application process and the elements involved with the issuing of the licence.
- 1.8 There are mandatory conditions imposed by all local authorities in relation to any given HMO licence; requiring the property to be kept to an acceptable standard and setting out the documentation to be provided in relation to the elements described above.

2. Overcrowding

- 2.1 All HMO's have minimum room sizes that must be adhered to and this will take into consideration the following:
 - a. The presence of cooking facilities (including the storage and preparation of food) within both bedrooms and in separate rooms
 - b. How many people a bedroom can accommodate
 - c. The presence of a separate living room within the property that the occupants can use
 - d. The number of kitchens and bathrooms in the property in relation to the number of occupants.
- 2.2 Using an example of a licensed HMO, a mandatory (statutory) minimum bedroom size of 6.51m² for a

single adult and 10.22m² for two occupants is required. In the event where, upon inspection, officers discover bedrooms that fall beneath such requirements, additional conditions are applied to the licence to prohibit occupancy.

- 2.3 Whilst the Council acknowledges the legal mandatory standards that apply to HMOs, it recognises that for many occupants (such as those working and living from home), aspects such as minimum room sizes do not form an 'ideal standard'. The Council would urge landlords to review the council's local amenity guidance for HMOs (available on the Council's webpages) as good practice for this type of accommodation.
- 2.4 A particular concern for enforcement officers is the discovery of sub-let properties; whereby properties owners have leased their property to a head tenant (willingly or otherwise), who is then subletting to other tenants occupying the property. This can lead to overcrowding and other safety concerns if not managed responsibly.
- 2.5 A sub-let property can be so legally, so long as the head tenant acts as the responsible entity for the other tenants in the property; overseeing their tenancy agreement and manages the property and applies for any HMO licence if required. The owner of the property would need to give their permission for the property to be used in this manner and is still required to undertake periodic checks to ensure that the head tenant is renting the property out in line with the conditions of their tenancy.
- 2.6 A serious problem can arise whereby sublets have occurred without the knowledge of the property owner, potentially giving rise to properties that do not meet the required safety standards or licensing requirements. Where this is discovered by Council officers, financial penalties may be applied to both head tenant and owner.

3. Fit & Proper Persons

- 3.1 The Housing Act 2004 states that the Council must be satisfied that the proposed licence holder is a fit and proper person, such that the following elements are declared:
 - a. Any unspent or underlying spent convictions for offences;
 - b. Any unlawful discrimination;
 - c. Any contravention of any provision of the law

- d. relating to housing or of landlord and tenant law
- d. In addition, the Council may also take into account whether any person associated or formerly associated with the proposed licence holder or manager, has done any of the things mentioned above if it considers those matters to be relevant.

- 3.2 Any applicant who does not declare unspent convictions will be committing an offence and liable to a fine of up to £5,000. A licence could also be denied or revoked in such cases, with the Council likely to pursue such an offence as they arise, subject to legal review.

4. Planning & External Stakeholders

- 4.1 Where an HMO licence application is made for a large HMO, the building falls into a separate 'sui-generis' use class and as such EHOs will notify the planning department of this change, so that a decision can be made on the appropriate planning permissions required. Typically, only when an existing property has been converted to a large HMO (as per a separate planning definition; more than six tenants), will planning permission be required.
- 4.2 It is important to note that planning and HMO licensing approvals operate within their own legal sphere (albeit often in parallel with one another); with one application not predicated a decision on the other. In the eventuality whereby planning permission is refused on application, steps will be taken to ensure the variation of the licence.

5. Regulation & Enforcement

- 5.1 The Council typically receives relatively low complaints from tenants or third parties with regard to its HMO stock, when compared to the total tenure mix (as below); with the majority of HMOs inspected by officers in Richmond constituting well managed and maintained properties:

Licensed HMOs	2%
Non HMOs	68%
Standard HMOs	21%
Empty Properties	7%
Other/Misc.	2%

5.2 The above figures reflect comparatively low volumes of complaint (and subsequent enforcement) related to licensed HMOs. It can be argued that this may be due to the increased scrutiny the process affords the Council, in addition to greater opportunities for dialogue with landlords. The above factors also serve as mechanism for tenant assurance in the property being rented.

5.3 The Council will continue to respond to both existing and emerging legislation. These include:

5.3.1 Housing Act 2004; applicable to both HMOs and other tenure types – places a duty on the Council to inspect properties to identify Category 1 and 2 hazards (e.g. damp and mould, fire, falls between levels etc.) and to take mandatory or discretionary action in relation to them. It also covers mandatory licensing of HMOs, including the ability to impose licence conditions and powers of enforcement for breaches of such conditions, as well as licensable HMOs which are being operated without a licence.

5.3.2 Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020; applicable to both HMOs and other tenure types - requiring landlords to have electrical installations in their properties inspected and tested by an appropriate person at least every 5 years. The regulations came into force on 1 June 2020 and applied to new tenancies from 1 July 2020 and subsequently all existing tenancies from 1 April 2021; with Council officers able to issue fines up to £30,000 applicable for breaches of the requirements set out.

5.3.3 The Energy Efficiency (Private Rented Property) (England and Wales) Regulations 2015; applicable to both HMOs and other tenure types – requires certain rental properties to have an EPC rating of E or above and allows the Council to impose penalties on landlords whose properties do not comply with the Regulations.

5.3.4 The Management of Houses in Multiple Occupation (England) Regulations 2006; applicable to all HMOs whether licensable or not (excluding section 257 HMOs) – impose duties on HMO managers and HMO occupiers in relation to the property condition and management.

5.4 Any penalties issued by Council officers with regard to failures to meet the required standards, coupled with general closer scrutiny of the licensed HMO sector can be said to be a significant deterrent for landlords considering operating an HMO without a licence or not meeting the standards required of a large HMO.

5.5 The Council will continue to act upon complaints from a multitude of sources; including current tenants, previous tenants, or third-party sources (such as neighbours, family & friends); all within an evidence based approach and taking robust action where required. Where action is not within the Council's gift, officers are committed to supporting residents and advising on alternative methods of recourse, including liaising with other parties such as Citizens Advice or Police, where required.

6. Tenant Support

6.1 The Homes (Fitness for Human Habitation) Act 2018 enabled and strengthened tenants' ability to take their landlords to court whereby certain repairs or safety issues had not been addressed (and apply compensation where appropriate). Council officers are committed to assisting tenants through this process, often supporting such claims with the findings of a formal inspection.

6.2 Details of the mechanisms of further support are detailed on the Council's web pages ([Homes Fitness for Habitation - London Borough of Richmond upon Thames](#))

