

Placement Policy: Allocation of Temporary Accommodation, Accommodation to Prevent Homelessness and Discharge of Duty

This Placement Policy accompanies the Homelessness Accommodation Strategy and should not be read or referenced in isolation. It also sits alongside a working protocol relating to households with children who are found to be intentionally homeless or are otherwise not owed a homelessness duty from Camden.

The council currently procures accommodation to meet a range of housing needs:

- Temporary accommodation for households accepted as homeless or those waiting for a homelessness decision.
- Accommodation in the private rented sector to prevent homelessness.
- Accommodation in the private rented sector to discharge the council's duty under the Localism Act 2011.

Allocation of Social Housing Tenancies

The Council's new allocations scheme sets out the priorities for social housing in Camden. Social housing tenancies are not routinely used to house homeless households either temporarily or permanently as the demand for social housing tenancies far outstrips supply in Camden. The new allocation scheme grants priority to families engaging with the Council to prevent their homelessness and awards a further 100 points to households where homelessness has been prevented for a period of six months.

The Floating Support Service works with families in Temporary Accommodation and assisted bidding is offered where appropriate to ensure that all that are eligible are able to access the council's housing allocation scheme.

Priorities for private sector accommodation

When procuring accommodation in the private sector, priority will generally be given to homelessness prevention cases in line with the Council's priorities to work with households to prevent statutory homelessness. The homelessness prevention approach is aimed at reducing the need to place households in temporary accommodation and instead moving them on to settled accommodation to meet their housing need. The approach means that families should spend little or no time in temporary accommodation and will not face repeated moves and the disruptions that that involves. It also minimises the amount of temporary accommodation the council has to provide.

The offer of private rented properties to applicants threatened with homelessness is a voluntary option and where they have refused a maximum of 3 reasonable offers (one offer within Camden borough may be considered sufficient) they will be given the option of making a statutory homeless application, in which case if they do apply and the main duty is accepted they will normally then receive one Private Rented Sector Offer to end the duty.

Where a household applies as homeless (after the council adopted the power held in the Localism Act 2011 to end the main duty with an offer of a suitable private sector tenancy) then the main housing duty, if accepted, will usually be ended with one private rented suitable offer (the "PRSO"). We will generally look to offer PRS supply to prevention cases ahead of discharge cases but a decision will be made on a case by case basis, with the priority being to ensure a successful letting.

All accommodation in the private sector must comply with basic minimum standards:

- Physical standards. Checks will be completed to ensure that electrical and gas equipment is safe and a fire risk assessment will be carried out. Properties will have an Energy Performance Certificate and a valid Gas Safety Certificate. Where feasible, properties will be pre-inspected to ensure they meet minimum standards and are safe
- Good management and the role of the landlord. Landlords will be expected to demonstrate that they are a 'fit and proper landlord' (for example through membership of a landlord accreditation scheme) and provide a written tenancy agreement.

When deciding if a property is suitable for a particular household, the following factors will be taken into consideration.

- Affordability. Where a household is claiming housing benefit, we look for properties that meet a household's bed need that are in areas where the LHA rent is affordable. In the current climate of rising rents, such properties are likely to be out of borough, and increasingly out of London, particularly for larger properties. We will consider a household's income and their ability to meet any shortfall between the housing benefit paid and the rent. In some cases, such as when being housed temporarily, households may be eligible for a discretionary housing payment (DHP). However, DHP will only be considered as a short-term 'stop-gap' and not as a long-term solution for housing affordability. Ensuring that accommodation is affordable is central to the success and sustainability of our strategy.
- Location. Where accommodation is procured outside of Camden, we will consider the distance of the property from Camden and how the location of the property affects family members. This includes, as far as possible, the impact of location on the factors listed below. Where we make placements outside of the borough, we will notify the Local Housing Authority as required by the Housing Act 2008 (part VII section 208).
- Services, amenities and transport. We will consider the proximity and accessibility of the accommodation to local services, amenities and transport.
- Employment. The type and hours of employment will be taken into consideration alongside the cost and ease of any potential commute. The possibility of taking up new employment will also be considered.

- Children. In accordance with section 11 of the Children Act 2004 we will consider the needs of any children in the household and how to safeguard and promote those needs.
- Education. The age and stage of education of children will be taken into account, including any public examinations the children will be taking. The cost (particularly for over 16s where travel costs will be incurred) and ease and distance of any potential commute to existing schools will be considered along with the possibility of relocating to schools closer to the property offered. Support provided to any children with special educational needs will also be taken into consideration. Children of primary school age may need to move to schools closer to their new home.
- Childcare and other caring responsibilities. Existing childcare arrangements are considered as well as any other caring responsibilities, including the nature of the care provided, and the feasibility of maintaining these or making other arrangements.
- Medical and health issues. Any medical or health needs will be taken into account, including any current ongoing treatment and support and the possibility of transferring to new healthcare providers closer to the property. Where a household needs accessible accommodation, this will be taken into account.
- Family and community support. As far as possible, family support and community links will be taken into consideration. Where there is social worker involvement with a family, they will be involved in any discussions about moving the family to alternative accommodation to ensure their needs can be met.
- Families in need Priority for properties in or accessible to Camden will be given to families in need. This is in accordance with Camden's duties under Section 11 of the Children's Act 2004. Equally, for families not owed a housing duty by Camden but with dependent children, the council will ensure that the needs and welfare of children are safeguarded. Families prioritised as 'in need' include:
 - Households where children are at risk or may be significantly disadvantaged, including households giving or receiving care, care leavers, children on the Child Protection Register, children at a significant educational milestone.
 - Households with at least one family member who has a severe disability or significant health condition – for example,
 - a person with severe and enduring mental health problems who is receiving psychiatric treatment and aftercare (provided by local community health services) and has an established support network where a transfer of care would severely impact on their ability to engage with treatment or care plans.

- A person suffering from a life threatening illness or a severe disability receiving regular (at least fortnightly) treatment under the care of a hospital in the borough.
- A person in receipt of a significant care package (provided or sponsored by the Director of Housing and Adult Social Care) which cannot be transferred.
- Households where there is a risk to be managed – for example, those with a history of anti-social behaviour, prolific and persistent offenders, those housed through MAPPA etc.

Households with children known to Family Services and Social Work as Children in Need who accept housing out of borough will be transferred to the appropriate new-borough support service. The new local authority's children service will be notified by Camden and a period of joint working will ensure the needs and welfare of the children are safeguarded.

For most families it is unlikely that accommodation will be in Camden due to limited availability and affordability. Whenever possible, suitable accommodation will be sought in areas easily accessible to Camden.

Bedroom need

The following household members are expected to share a bedroom:

- adult couples
- 2 children aged under 16 of the same sex
- 2 children aged under 10 regardless of sex.

The following household members are entitled to their own room:

- a single adult (aged 16 or over)
- a child that would normally share but shared bedrooms are already taken, for example if the household has 3 children and 2 already share
- children who cannot share because of a disability or medical condition

We will offer couples & lone parents with a single child of less than 3 years at the start of the placement a one bedroom property where the overall size of the accommodation is sufficient for the needs of 1 or 2 adults and one child.

How PRS accommodation will be allocated

When a property is made available, suitable applicants will be identified. Allocating accommodation procured in the private sector is often time-critical as landlords want to minimise lost rents due to void periods and we need to limit the risk of the property being let elsewhere. Due to the short time frames involved in the allocation of private sector properties, potential applicants will be contacted directly by the Council to

arrange a viewing. Where an applicant cannot be contacted another potential applicant will be contacted.

Where accommodation is for a homelessness prevention case, up to three households may be selected to attend a viewing. For discharge of duty cases, one applicant will view the property.

The final decision to accept or reject a household will usually rest with the landlord. If the landlord refuses a nominated household, the offer will be withdrawn and a further offer will be made when a suitable property becomes available.

If an applicant working with the council to prevent their homelessness refuses a maximum of three suitable private sector offers, we will offer to make a statutory homelessness assessment, which could result in a final discharge of duty offer. If an applicant refuses the discharge of duty offer, this can result in the council ending its homelessness duty to that applicant.

When making a discharge of duty offer, a snapshot of approved and available accommodation will be taken from the Housing Needs Group or equivalent database.

Once both the applicant and landlord accept, an assured shorthold tenancy with a minimum fixed term of 12 months will be given.

Prioritising households awaiting a discharge of duty for available PRS properties

The decision about which household to make an offer of private rented accommodation to, as discharge of the S193 homelessness duty, will take into account a range of circumstances, which will depend on the individual circumstances of the applicant, including:

- a. The cost of the existing temporary accommodation to the council
- b. The suitability of the applicant's current temporary accommodation, including affordability.
- c. The likely availability of alternative social housing
- d. Time in Temporary Accommodation (with those who have been in TA longer taking priority)

Priority for housing locally

All properties provided to be used for Private rented sector offers will be zoned as follows:

- Zone A1 – located in the London Borough of Camden
- Zone A2 – located in a nearby borough (e.g. Brent, Barnet, Enfield, Haringey, Hackney, Islington, Newham, Southwark, Westminster, Waltham Forest)

- Zone B – located in another London borough
- Zone C – located near to London (within 50 miles, including the Home Counties)
- Zone D- located beyond zone C

Applicants will be individually assessed prior to any offer to determine the type and location of accommodation that should be offered. The needs of the household will be recorded in full along with any action to mitigate disruption. A snap shot of available properties will be taken from the Housing Needs Database of properties (HNG) or equivalent.

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

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

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

Placement Summary Grid:

Property Zone	Household Description
A1	<ul style="list-style-type: none"> • households with at least one child registered on the Child Protection Register in Camden • households where Camden's Social Services has serious concerns about one or more children and is working intensively with the household • households with one child (or more) who has a Statement of Special Educational Needs, which could not be provided by another LA or where the move would be seriously detrimental to the child's wellbeing. • households with an applicant who has severe and enduring mental health problems who is receiving psychiatric treatment and aftercare provided by local community health services and has an established support network where a

	<p>transfer of care would severely impact on their ability to engage with treatment and care plans</p> <ul style="list-style-type: none"> • households where at least one member is in receipt of a significant care package provided or sponsored by Camden's Social Services which cannot be transferred • Households where there is a risk to be managed such as those with a history of anti-social behaviour, prolific and persistent offenders and those housed through MAPPA and other projects
A 2	<ul style="list-style-type: none"> • households with one child (or more) in secondary school in their final year of Key Stage 4 (generally Year 11) • households where at least one member is suffering from a life threatening illness, or is severely disabled and is receiving regular (at least fortnightly) treatment at a hospital in Camden • Care leavers moving on in accordance with the councils pathway plan • Households where one person (or more) is in permanent and settled employment in or near to Camden and this employment will be lost should the member be unable to commute to their place of work. • Households receiving care, which would be disrupted or cease if the registered care provider is unable to commute to fulfil their caring duties • Households where a member of the household is caring for another person in the borough who falls into one of the following categories and they would be unable to commute to meet their caring duties: <ul style="list-style-type: none"> i. Over 75 years old and living alone, or with no other member of the household under 75 years of age, OR iii. In receipt of the medium or higher rate of the care component or the higher rate of the mobility component of the Disability Living Allowance, Attendance Allowance or War Disablement pension
B	<ul style="list-style-type: none"> • Household with one or more child in secondary school or further education college in Camden or neighbouring borough (other than those in the final year of Key stage 4 - see Group A above). This group will be prioritised for housing within reasonable commuting distance of the school or college. • Households where one person (or more) is in permanent and

	<p>settled employment and this employment will be lost should the member be unable to commute to their place of work. This group will be prioritised for housing within reasonable commuting distance of their workplace.</p> <ul style="list-style-type: none"> Households where one person (or more) is receiving medical treatment that can only be provided by a specific medical facility: this group will be prioritised for housing within reasonable commuting distance to the medical facility
C	<ul style="list-style-type: none"> Households not falling within A and B above where one person (or more) has a need to be within reasonable commuting distance to London
D	<ul style="list-style-type: none"> All other homeless households will be offered private rented sector accommodation wherever the borough is able to procure it

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

It is forecast that placements may be made by in each zone in the following proportions, though this data must be treated with caution as this will depend on the outcome of many factors that will affect supply and demand:

Zone	Placement %
Zone A 1	5
Zone A2	40
Zone B	40
Zone C	10-15
Zone D	0-5

How temporary accommodation is allocated

Based on data since April 2013 we can anticipate needing to place around 70 households into temporary accommodation in 2016/17. We can also anticipate needing to transfer around 130 placed households from one TA placement to another, for reasons such as household composition changes, changing medical needs, risk of violence and so on.

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

Where a Camden hostel is not suitable due to the household size or medical circumstances or a hostel would be suitable but is not available, annexe accommodation will be procured. Once accommodation has been identified, the family will be given an offer letter and a note of their responsibilities whilst living in the temporary accommodation. In placing families in annexe accommodation the Council will take account, as is reasonably practical, of the placement grid (A-D) above in deciding which families to select for accommodation in, or at various distances from, Camden.

If annexe accommodation is found, the applicant will meet the provider at the property and they will be shown the utility meters etc. These properties will be furnished with a cooker, fridge, table and chairs, sofa and beds. For hostel accommodation, the family will be sent to the hostel and where they will complete the necessary paperwork with the Customer Services Officer.

Communication

Households approaching the Council due to homelessness or the threat of homelessness are informed, in writing, of the options available to them. The Council encourages families threatened with homelessness to work with the council to prevent their homelessness in favour of making a statutory homelessness application.

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

Reviews

Applicants placed in temporary accommodation pursuant to the main housing duty have a right of review in relation to suitability under Section 202 of the Act.

Applicants can also request a review within 21 days of receiving their offer of private rented sector accommodation which has been assessed as suitable by the local authority under Housing Act 1996 Part VII. The review will be carried out by an officer who has not been involved in the original decision who is senior in grade to the decision-making officer.

