

AGENDA FOR

CABINET

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To: All Members of Cabinet

Councillors : M C Connolly (Leader and Cabinet Member for Business Engagement and Regeneration) (Chair), R Shori (Deputy Leader and Cabinet Member for Finance and Housing), P Heneghan (Cabinet Member for Children, Families and Culture), T Isherwood (Cabinet Member for Environment), J Lewis (Cabinet Member for Communities), A Simpson (Cabinet Member for Health and Wellbeing) and S Walmsley (Cabinet Member for Resource and Regulation)

Dear Member

Cabinet

You are invited to attend a meeting of the Cabinet which will be held as follows:-

Date:	Wednesday, 4 November 2015
Place:	Meeting Rooms A & B - Town Hall
Time:	6.00 pm
Briefing Facilities:	If Opposition Members and Co-opted Members require briefing on any particular item on the Agenda, the appropriate Director/Senior Officer originating the related report should be contacted.
Notes:	

AGENDA

1 APOLOGIES FOR ABSENCE

2 DECLARATIONS OF INTEREST

Members of Cabinet are asked to consider whether they have an interest in any of the matters of the Agenda, and if so, to formally declare that interest.

3 PUBLIC QUESTION TIME

Questions are invited from members of the public present at the meeting about the work of the Council and the Council's services.

Approximately 30 minutes will be set aside for Public Question Time, if required.

4 MINUTES (*Pages 1 - 6*)

To approve as a correct record the minutes of the meeting held on 14 October 2015.

5 ADOLESCENT SUPPORT UNIT (*Pages 7 - 40*)

6 ALLOCATIONS POLICY - UPDATE (*Pages 41 - 86*)

7 HOMELESSNESS STRATEGY 2015-2018 (*Pages 87 - 106*)

8 URGENT BUSINESS

Any other business which by reason of special circumstances the Chair agrees may be considered as a matter of urgency.

Minutes of:	THE CABINET
Date of Meeting:	14 October 2015
Present:	Councillor M Connolly (in the Chair) Councillors P Heneghan, J Lewis, R Shori, and S Walmsley
Also Present:	Councillor T Tariq (Deputy Cabinet Member for Health and Wellbeing) in the absence of Councillor Simpson
Apologies:	Councillors A Simpson and A Isherwood
Public attendance:	no members of the public were in attendance.

CA.01 DECLARATIONS OF INTEREST

Councillor Connolly declared a personal interest in any matters relating to the fact that his partner is employed by Persona Care and Support Ltd (Local Authority Trading Company providing a range of adult social care services).

CA.02 PUBLIC QUESTION TIME

A period of thirty minutes was allocated for any members of the public present at the meeting to ask questions about the work or performance of the Council or Council services.

No questions were asked.

CA.03 MINUTES

Delegated decision:

That the minutes of the meeting held on 2 September 2015 be approved and signed by the Chair as a correct record.

CA.04 DIRECTOR OF PUBLIC HEALTH ANNUAL REPORT

The Cabinet Member for Health and Wellbeing submitted a report presenting the Director of Public Health Annual Report. The Director of Public Health is required to produce and publish an independent annual report that will focus on a different theme each year. The theme for the 2013/14 was the role of the Council in improving health.

The Council's Senior Leadership Team (SLT) has also recommended the adoption of the recommendations in the report (this is subject to the slight caveat to recommendation 2 within the Active and Safe Travel chapter – Whilst agreeing that 'Walking and cycling considerations should be embedded and prioritised within transport and land-use decision making', the SLT felt that it would be difficult to commit to 'rejecting proposals whose impact on walking and cycling will not be positive'). The SLT have identified leads within the Council responsible for implementing the recommendations and have requested the Director of Public Health to report quarterly on progress

Cabinet 14 October 2015

towards implementation. The progress made on the recommendations will be included in the 2014/2015 report.

Delegated decisions:

1. That the Director of Public Health Annual Report be noted.
2. That the recommendations contained within the Director of Public Health Annual Report be accepted (subject to the slight caveat to recommendation 2 within the Active and Safe Travel chapter of the report submitted, as detailed above).
3. That the Senior Leadership Team be tasked with embedding actions to address the recommendations within Council strategies and plans and oversee and support their implementation.

Reasons for the decisions:

The production of a Public Health Annual Report is a statutory duty. The Council fully recognises the importance of the work to improve the health and wellbeing of the Borough's residents.

Other options considered and rejected:

To reject/amend the recommendations.

CA.05 CULTURAL ECONOMY STRATEGY 2015-2018 AND ACTION PLAN

The Cabinet Member for Children Families and Culture submitted a report presenting a Strategy for a Cultural Economy that will help Bury to build on its existing assets, promoting a stronger cultural economy in the future. A thriving Cultural Economy can provide significant financial and employment benefits, together with intangible benefits resulting from civic pride, community cohesion and better health and wellbeing of the population.

The Strategy will seek to maximise benefits to the Borough, by encouraging greater partnership working with all involved in this sector.

Delegated decision:

That approval be given to the Cultural Economy Strategy and associated Action Plan as detailed in the report submitted.

Reason for the decision:

This decision gives a clear focus and direction to the cultural economy sector in the Borough for the next three years. Bury has an established reputation as a cultural and visitor destination that should be maintained and developed for future growth.

Other option considered and rejected:

To reject the recommended Strategy and Action Plan. This would leave the Council without a strategy to increase the benefits to the Borough associated with having a strong cultural economy.

CA.06 ADOPTION OF REVISED STATEMENT OF COMMUNITY INVOLVEMENT

The Cabinet Member for Resources and Regulation submitted a report setting out a revised version of the existing Statement of Community Involvement (SCI), which will set out how the Council will involve the community in preparing and revising all local planning documents, and in making decisions on planning applications. The document has been through a 4 week consultation process where 10 representations were received resulting in minor amendments being in order to produce the revised SCI.

Delegated decision:

That approval be given to adopt the revised Statement of Community Involvement as detailed in the report submitted.

Reasons for the decision:

The revised SCI will take account of circumstances, including how consultation and community involvement will take place in respect of the Greater Manchester Spatial Framework (GMSF), which is to be prepared by each of the Greater Manchester authorities.

Other options considered and rejected:

1. To amend the SCI before adoption. Members are requested to specify the nature of any revisions to be sought.
2. To reject the recommendation and not adopt the SCI.

CA.07 HEALTH AND WELLBEING BOARD ANNUAL REPORT AND REFRESHED HEALTH AND WELLBEING STRATEGY

The Cabinet Member for Health and Wellbeing submitted a report presenting an annual report for the Health and Wellbeing Board for 2014/15 and a refreshed Health and Wellbeing Strategy. The refreshed strategy has five overarching priorities and is now a condensed version of the original strategy and is presented as a 'Plan on a page' with Team Bury Branding. A copy of the 'plan on a page' was circulated at the meeting for information.

The Cabinet was also requested to support a recommendation to Council to amend the membership of the Health and Wellbeing Board with the inclusion of a Greater Manchester Fire and Rescue Service representative.

Delegated decisions:

1. That approval be given to the vision and direction of the refreshed Health and Wellbeing Strategy.
2. That approval be given to support the following priorities:
 - Priority 1 – Starting Well
 - Priority 2 – Living Well
 - Priority 3 – Living Well with a long term condition or as a carer
 - Priority 4 – Ageing well
 - Priority 5 – Healthy Places
3. That the Bury Health and Wellbeing Strategy Governance Structure be noted.

Cabinet 14 October 2015

4. That progress be reviewed in the 2015/16 Annual Report.
5. That support be given to amend the membership of the Health and Wellbeing Board to include a representative of the Greater Manchester Fire and Rescue Service.

Recommendations to Council:

1. That the Health and Wellbeing Annual Report and Refreshed Health and Wellbeing Strategy be approved.
2. That the membership of the Health and Wellbeing Board be amended to include of a representative of the Greater Manchester Fire and Rescue Service.

Reason for the decisions:

The Health and Wellbeing Boards has a statutory duty to produce a Joint Health and Wellbeing Strategy.

Other option considered and rejected:

To reject the recommendations.

CA.08 MINUTES OF THE ASSOCIATION OF GREATER MANCHESTER AUTHORITIES / GREATER MANCHESTER COMBINED AUTHORITY

The minutes of the meetings of the Association of Greater Manchester Combined Authority and the Joint AGMA Executive Board and the Greater Manchester Combined Authority held on 25 September 2015 were submitted.

Delegated decision:

That the minutes of the meeting of the Association of Greater Manchester Combined Authority and the meeting of the Joint AGMA Executive Board and the Greater Manchester Combined Authority held on 25 September 2015 be noted.

CA.09 EXCLUSION OF PRESS AND PUBLIC

Delegated decision:

That in accordance with Section 100(A)(4) of the Local Government Act 1972, the press and public be excluded from the meeting during consideration of the following items of business as it involves the likely disclosure of exempt information as detailed in the condition of category 9.

CA.10 RADCLIFFE GROWTH AND INVESTMENT LEISURE, CIVICS AND HOUSING

The Deputy Leader and Cabinet Member for Finance and Housing submitted a report providing members with information in connection with a successful bid to the Homes and Communities Association (HCA), supported by the Council. The bid is in connection with a proposal to develop a 40 unit high quality affordable housing scheme on the site of the existing Radcliffe Civic Hall and adjacent Council owned recreation land.

The report also provided an update regarding ongoing work to demolish the existing Radcliffe Pool and Fitness Centre following its closure in June 2015.

Delegated decisions:

1. That approval be given to the sale of Council owned land, namely the site of the existing Radcliffe Civic Hall and adjacent recreation land, to Great Places Housing Association, to enable them to develop a 40 unit affordable housing scheme; subject to satisfactory agreement of the land value to be paid to the Council by Great Places Housing Association.
2. That authority be delegated to the Interim Executive Director of Resources and Regulation and the Executive Director of Communities and Wellbeing, in consultation with the Leader of the Council and Deputy Leader & Cabinet Member for Finance and Housing, to approve the independently determined land value, and the commercial terms between the Council and Great Places Housing Association.
3. That, subject to satisfaction of decisions 1 and 2 (above), approval be given to the closure of the existing Radcliffe Civic Hall with effect from 17 April 2016, together with the release of surplus Council owned recreation land adjacent to the Civic Hall.
4. That, subject to satisfaction of decisions 1 and 2 (above), approval be given to advertise the disposal of public open space and that delegated authority be given to the Leader of the Council and Deputy Leader and Cabinet Member for Finance and Housing to:
 - Determine any objections received from the advertisement; and
 - To make a final decision as to whether or not to approve of the disposal of the public space in the light of any objections.
5. That approval be given to further investigation into the development of a combined leisure centre and civic venue on the site of the former Radcliffe Pool and Fitness Centre on Green Street Radcliffe. This will include the development of a business case for capital expenditure and associated sustainable running costs for a new venture
6. That the ongoing work to demolish the existing Radcliffe Pool and Fitness centre, that closed to the public in June 2015, be noted.

Reasons for the decisions:

The decision provides Radcliffe with much needed affordable housing and enables further investigation into the development of a business case for a possible new combined leisure centre and civic venue.

Other options considered and rejected:

1. To reject the recommendations and do nothing. Radcliffe would miss out on an opportunity to deliver much needed affordable housing and an associated approved grant from the HCA to assist scheme delivery. It could also slow down the momentum in regenerating new facilities for the town centre as part of the wider Radcliffe regeneration.

Cabinet 14 October 2015

2. Delay closure – Delaying closure of the Civic Hall would result in losing the grant funding. There would also be a reputational issue with the HCA and Great Places given that the Council has a successful track record of delivering grant funded projects.

CA.11 CHAMBERHALL – DEVELOPMENT AGREEMENT E

The Leader of the Council and Cabinet Member for Regeneration submitted a report regarding potential development of the Chamberhall Business Park.

Delegated decisions:

1. That it be noted that the Council is currently advertising the development opportunity at Chamberhall in the European Journal.
2. That the Chief Executive and the Executive Director of Resources and Regulation be given delegated authority, in consultation with the Leader of the Council, to consider all of the bids received and to approve the agreement of the terms for, and the granting of a Development Agreement to, the developer providing the most advantageous bid, in accordance with the award criteria.

Reason for the decisions:

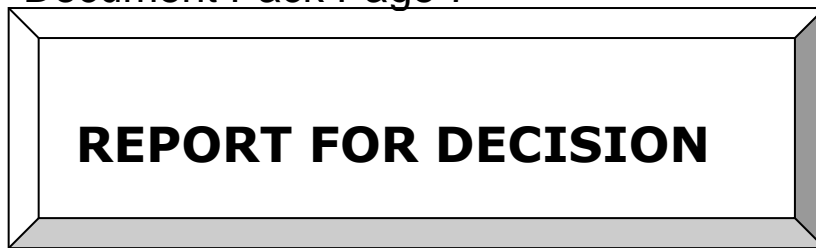
The decision will allow the market to be tested with a view to securing a developer to further develop the Chamberhall Business Park.

Other options considered and rejected:

To reject the recommendations.

COUNCILLOR M Connolly
Chair

(Note: The meeting started at 6.00 pm and ended at 6.15pm.)



DECISION OF:	CABINET
DATE:	4 NOVEMBER 2015
SUBJECT:	ADOLESCENT SUPPORT UNIT
REPORT FROM:	CABINET MEMBER FOR CHILDREN, FAMILIES AND CULTURE
CONTACT OFFICER:	JACKIE GOWER ASSISTANT DIRECTOR (SOCIAL CARE AND SAFEGUARDING)
TYPE OF DECISION:	CABINET - KEY DECISION
FREEDOM OF INFORMATION/STATUS:	This paper is within the public domain
SUMMARY:	<p>This report proposes that Bury Council invest in an Adolescent Support Unit (ASU). By preventing children and young people from entering care, as well as supporting foster placement stability, the unit will work immediately to reduce the upward pressure on the children's social care budget, while improving outcomes for some of Bury's most vulnerable young people and their families. Over the longer term, the ASU may deliver an actual reduction in expenditure on looked after children.</p> <p>An exercise to model the financial benefits of investment indicates a benefit cost ratio of around 2:1. Over and above the benefits modelled, it is expected that preventing children entering care will reduce demands on social workers, improve educational attainment and performance and reduce the number of young people entering the Criminal Justice system.</p> <p>The cost to the Council of the unit is £375,000 to establish the ASU in the latter part of 2015/16 and contribute to its running costs in 2016/17. The requested breakdown in funding is £75,000 in 2015/16 and £300,000 in 2016/17.</p>

OPTIONS & RECOMMENDED OPTION	That the Cabinet approve the proposal of establishing an Adolescent Support Unit and funding.
IMPLICATIONS:	
Corporate Aims/Policy Framework:	<p>Do the proposals accord with the Policy Framework? Yes, the proposals accord with the following Corporate Priorities as set out in the Council's Vision, Purpose and Values 4.I - Reduce the demand for high end targeted and specialist services to keep children and young people safe from harm through prevention and early help. 4.J - Improve outcomes for vulnerable children, young people and families by effective multi-agency working and integrated service delivery.</p>
Statement by the S151 Officer: Financial Implications and Risk Considerations:	<p>This proposal requires initial funding of £375,000 over 2015/16 and 2016/17.</p> <p>Thereafter the proposal delivers annual savings rising to £405,000 in 2019/20.</p> <p>Project risks are outlined in section 4 of the report.</p>
Health and Safety Implications	The Adolescent Support Unit will be registered with Ofsted as a children's home and will therefore meet all the relevant regulated standards for Health and Safety.
Statement by Executive Director of Resources (including Health and Safety Implications)	<p>This proposal will mitigate the need for expensive external care packages and improve outcomes for vulnerable young people.</p> <p>Health and safety implications are addressed in section 4 of the report.</p>
Equality/Diversity implications:	Yes (see paragraph below)
Considered by Monitoring Officer:	Yes There are no legal implications at this stage
Wards Affected:	Depends on location – this to be determined
Scrutiny Interest:	

TRACKING/PROCESS

DIRECTOR: Mark Carriline – Executive Director for Children, Families and Culture

Chief Executive/ Strategic Leadership Team	Cabinet Member/Chair	Ward Members	Partners
√			

Scrutiny Committee	Cabinet/Committee	Council	
	4 November 2015		

1.0 BACKGROUND

- 1.1 This report proposes investment in an Adolescent Support Unit (ASU) in Bury. By preventing children and young people from entering care, as well as supporting foster placement stability, the unit will contribute to improving the life chances of some of Bury's most vulnerable young people and to reducing the upward pressure on the children's social care budget. This is line with Bury Council's corporate priorities, specifically to reduce demand for high end targeted and specialist services through prevention and early help.
- 1.2 Adolescent Support Units (ASUs) are being developed by a growing number of authorities in the North West and nationally and have been endorsed by the Department of Education. They combine a short term respite service with family outreach to provide young people and their families with a service committed to maintaining and rebuilding family and parenting relationships where these are under severe pressure. By operating from a friendly 'home' base, staffed by a dedicated team of experienced family support workers, the unit is able to provide a flexible offer to families in crisis which addresses both the need for family members to have 'time out', and for intensive family therapy, either on site, or at the family home. While staying on site, the unit provides young people with a structured range of recreational and educational activities that help rebuild self-esteem and encourage team working and peer support.
- 1.3 There is increasing evidence that ASUs are delivering positive outcomes for young people, preventing family breakdowns and young people entering care. Blackburn and Darwen, which established its ASU in late 2006, now has the lowest proportion of 11 to 16 year olds in residential care in the country. The number of teenagers entering care of any type (including foster and residential care) has declined from 47 in 2008/09 to 11 in 2014/15. This compares very favourably to national trends.

2.0 THE PROPOSED ADOLESCENT SUPPORT UNIT IN BURY

- 2.1 It is proposed to establish a four bed unit in Bury with a staffing establishment of nine. The unit will be required to register with Ofsted as a children's home although overnight stays will be for respite only. The size and staffing levels proposed reflect expected demand and comply with regulated standards. They draw on Blackburn's experience, where the actual level of demand for the unit is similar to that anticipated in Bury. CYPC is currently working with Corporate Property Services to identify a suitable property.
- 2.2 The unit will provide social care professionals with a service to which to refer children and young people who may be on the edge of care, or at risk of placement breakdown with foster carers. The unit will assess referrals and accept them on the basis of a clear support plan that sets out how the combined offer of short term respite and family outreach will address the needs of the young person and their family in preventing relationship breakdown and an escalation of need.
- 2.3 The unit will be open 24/7 on Fridays, Saturdays, Sundays and Mondays and open on the other days between 07:00 and 22:00, though not normally during

school hours. Respite stays for up to four children will be available on the days of 24 hour opening. These stays will be booked in advance, as set out in individual care plans. While receiving the service, children and young people will remain under the care of their social work professional.

- 2.4 The respite service and outreach service will be available to 11 to 16 year olds. Younger children (from eight to 10) and their families will be supported through the outreach service.
- 2.5 Assuming the proposal is approved, it is expected that the outreach team will become operational in June 2016 and the respite unit will open in December 2016. The longer lead time to open the unit is determined by the Ofsted registration process.

3.0 BUSINESS RATIONALE – BENEFITS

- 3.1 The ASU will deliver benefits through improved outcomes for young people and their families, leading to reduced expenditure on children’s social care. Specifically the service will deliver:
 - Reduced admissions into local authority care under Section 20 (admission with parental consent).
 - An acceleration in the safe discharge of children and young people from placements at home.
 - A reduction in the rate of breakdown in foster placements.
 - Reduced expenditure on bespoke packages of care delivered at home.
- 3.2 An exercise to model these impacts indicates that within three years of becoming fully operational, the unit will ultimately deliver gross annual benefits of over £800,000. With costs at approximately £400,000, the benefit cost ratio is equivalent to 2:1. The Business Case provides the detail behind these calculations. Table 1 projects net annual benefits to 2019/20.

Table 1 ASU – Net benefits (financial benefits less annual expenditure)

	2015/16	2016/17	2017/18	2018/19	2019/20
	£000's	£000's	£000's	£000's	£000's
Set-up Costs					
Project Manager	25	25			
Refurbishment	50				
Expenditure					
Staffing		325	330	335	340
Running Costs & Fees		60	60	60	60
Rent		20	20	20	20
Annual Expenditure	75	430	410	415	420
Financial Benefits		<i>(3 mths)</i>	<i>Full Year</i>	<i>Full Year</i>	<i>Full Year</i>
S20 admissions - 25% reduction		(65)	(275)	(275)	(275)
One less residential placement each year		(15)	(150)	(250)	(350)
'bespoke' care packages		(50)	(200)	(200)	(200)
Annual Benefit	0	(130)	(625)	(725)	(825)
Benefit less expenditure	75	300	(215)	(310)	(405)

- 3.3 The immediate effect of the ASU will be to reduce the upward pressure on the social care budget. Over a number of years, if the flow of children into care reduces relative to the flow out of care (as children already in the care system reached 18), then a *reduction* in the total spend on looked after children will be possible. This has been Blackburn’s experience, evidenced by the figures on the number of looked after children. Between 2006/07 and 2014/15 the number of 11 to 16 year olds coming into care fell from 47 to 11.
- 3.4 Over and above the benefits modelled, it is expected that preventing children entering care will reduce demands on social workers, improve educational attainment and performance and reduce the number of young people entering the Criminal Justice system. The benefits modelled in the business case are therefore likely to be a conservative estimate of the total attributable to the proposed investment.

4.0 RISK MANAGEMENT (INCLUDING HEALTH AND SAFETY)

4.1 Table 3 presents risks and corresponding mitigation measures.

Table 3 - Risks and mitigation measures

Risk category	Specific risk	Outcome	Mitigation strategy
Internal management	Failure to comply fully with Ofsted regulations, including location assessment (new in April 2015)	Registration delayed	Experience of registering a residential facility with Ofsted to be an essential criterion for recruitment of Project Manager.
	Delay in recruiting unit manager/staff team	Service delivery delayed	Appoint suitable Project Manager ASAP.
			Experience of working within Children's Social Care within an outreach or residential service to be an essential criterion for recruitment of Project Manager.
Insufficient referrals	Service not financially viable (costs outweigh benefits)	Referral pathways and service protocols developed during project implementation stage to ensure that role and contribution of service is fully understood by all stakeholders in advance of service going live.	
Environmental	Delay in locating a suitable building in a suitable location within Bury	Project delayed	Look at all options straight away including purchase of a suitable property.
	Refurbishment costs higher than anticipated	Increased project cost	CYPC to make adequate contingency to offset this risk.
Political	Local councillor objects to location of unit in their ward	Project delayed	Ask Blackburn councillor with lead for Children and Young People to invite a small cross party group of councillors to visit the ASU in Blackburn

	Local residents object to location of unit in their locality	Vociferous public/press/social media campaign seeking to prevent establishment of unit leads to delay	PM to work with Comms team to develop a media/comms strategy well in advance of any public announcement.
			Choice of location to anticipate reasonable community 'nuisance' issues including staff/visitor parking.
			Rename unit - 'adolescent' may have negative connotations.

4.2 The Adolescent Support Unit will be registered with Ofsted as a children’s home and will therefore meet all the relevant regulated standards for Health and Safety.

5.0 EQUALITY AND DIVERSITY

5.1 The ASU will advance the interests of some of the borough’s most vulnerable young people, including those with disabilities, teenage girls who are pregnant and young carers. Service design and development will be culturally sensitive to ensure that it is accessible to all of Bury’s diverse communities. By supporting young people at a time of acute crisis where there is a risk of family breakdown, the unit will contribute to improvements in the lives of a range of groups with characteristics which are protected under equality legislation.

6.0 CONCLUSION

6.1 This report recommends that Cabinet invests £375,000 in an Adolescent Support Unit to meet the needs of some of Bury’s most vulnerable children and young people. By providing a combined offer of short term respite and family outreach the service will prevent family breakdown and rebuild family and parenting relationships where these are under severe pressure. This will reduce admissions of children and young people into local authority care and support foster placement stability, reducing the upward pressure on the children’s social care budget, while improving outcomes for vulnerable young people and their families. Preventing children from coming into care will also reduce demands on social workers, and may have a positive impact on educational attainment and performance as well as reducing the number of young people entering the Criminal Justice system.

List of Background Papers:-

ASU Business Case
Equality Analysis

Contact Details:-

Jackie Gower
Assistant Director
(Social Care and Safeguarding)
Tel: 0161 253 5715



Adolescent Support Unit for Bury
Project Documentation: Business Case

Release: Draft V2

Date: 20/10/2015

Author: Rachel Stringfellow

Owner: Jackie Gower

Document Number: 1

Revision History

Date of this revision:

Revision date	Previous revision date	Summary of Changes	Changes marked

Approvals

This document requires the following approvals:

Name	Signature	Title	Date of Issue	Version

Distribution

This document has been distributed to:

Name	Title	Date of Issue	Version

Contents

1. Summary.....2

2. Project background.....3

3. Project Objectives and Costs.....4

4. Scope.....7

5. Assumptions.....7

6. Business case and benefits.....8

7. Views of staff working within Children’s care.....13

8. The Do Nothing Scenario.....15

9. Timeline.....16

BUSINESS CASE

1. Summary

This document sets out the business case for an 'invest to save' project to establish an Adolescent Support Unit (ASU) in Bury. By preventing children and young people from entering care, as well as supporting foster placement stability, the unit will work immediately to reduce the upward pressure on the children's social care budget, while improving outcomes for some of Bury's most vulnerable young people and their families. Over the longer term, it is expected that the ASU will contribute to an actual reduction in the amount spent on looked after children as the rate of children coming into care falls below that of those leaving care.

The expected flow of financial benefits delivered by the ASU has been modelled using a range of data.¹ The modelling indicates that financial benefits would gradually rise from around £525,000 in the first full year of operation, to £825,000 in the fourth year (see Table 3).

Over and above the benefits modelled, it is expected that preventing children entering care will reduce demands on social workers, improve educational attainment and performance and reduce the number of young people entering the Criminal Justice system. The benefits modelled are therefore likely to be a conservative estimate of the total attributable to the proposed investment.

The estimated annual running cost of the unit is £405,000 in 2016/17. Project set up costs are £100,000 (£75,000 in 2015/16 and £25,000 in 2016/17). Table 1 brings expenditure and benefits together to indicate the return on investment to 2019/20. As the unit will go live during the latter part of 2016/17, benefits in that year are modelled at 25% of the full year amount.

CYPC is seeking overall funding of £375,000 from the Council to establish the ASU in the latter part of 2015/16 and contribute to its running costs in 2016/17. The requested breakdown in funding is £75,000 in 2015/16 and £300,000 in 2016/17.

¹ This includes the profile of children in Bury who became looked after in the 12 months to June 2015, the rate of breakdown of foster care placements, and the profile of bespoke packages of care commissioned to support children to stay at home during 2014/15 (see Table 2).

Table 1 Expenditure and benefits, 2015/16 to 2019/20

	2015/16	2016/17	2017/18	2018/19	2019/20
	£000's	£000's	£000's	£000's	£000's
Set-up Costs					
Project Manager	25	25			
Refurbishment	50				
Expenditure					
Staffing*		325	330	335	340
Running Costs & Fees		60	60	60	60
Rent		20	20	20	20
Annual Expenditure	75	430	410	415	420
Financial Benefits		<i>(3 mths)</i>	<i>Full Year</i>	<i>Full Year</i>	<i>Full Year</i>
S20 admissions - 25% reduction		(65)	(275)	(275)	(275)
One less residential placement each year		(15)	(150)	(250)	(350)
'bespoke' care packages		(50)	(200)	(200)	(200)
Annual Benefit	0	(130)	(625)	(725)	(825)
Benefit less expenditure	75	300	(215)	(310)	(405)

* An annual uplift of around 5% is included for staffing costs.

2. Project Background

A key priority for Bury's Placement Strategy 2014 to 2016 is to reduce the need for children and young people to enter the care system by supporting families to stay together where it is safe and in the child's best interest to do so. One way to achieve this is through the development of services to support the parenting of older children and teenagers through difficult periods in their lives. An Adolescent Support Unit is such a service.

Adolescent Support Units (ASUs) are being developed by a growing number of authorities in the North West and nationally and have been endorsed by the Department of Education. They combine a short term respite service with family outreach to provide young people and their families with a service committed to maintaining and rebuilding family and parenting relationships where these are under severe pressure. By operating from a friendly 'home' base, staffed by a dedicated team of experienced family support workers, the unit is able to provide a flexible offer to families in crisis which addresses both the need for family members to have 'time out', and for intensive family therapy, either on site, or at the family home. While staying on site, the unit provides young people with a structured range of recreational and

educational activities that help rebuild self-esteem and encourage team working and peer support.

There is increasing evidence that ASUs are delivering positive outcomes for young people, preventing family breakdowns and young people entering care. Blackburn and Darwen, which established its ASU in late 2006, now has the lowest proportion of 11 to 16 year olds in residential care in the country. The number of teenagers entering care of any type (including foster and residential care) has declined from 47 in 2008/09 to 11 in 2014/15. As a proportion of all children and young people entering care, this has fallen from 41% to 14%.²

The significance of Blackburn and Darwen's achievement, in which the ASU has played a critical part, is threefold. First, for the improved outcomes in the lives of the young people and families themselves. Second, for its success in delivering a service where those children – the 5s and under - who have the best chance of successfully creating new family relationships are proportionately much the largest group entering care, rather than older children and teenagers who struggle to settle away from their birth families. Finally – and critically in the current financial context – for the impact on social care expenditure. Children's Services in Blackburn and Darwen estimate that they would have been spending £1,248,000 more on social care in 2013/14 in the absence of the ASU. At an annual cost of £400,000, the unit delivered a net saving of £848,000.

3. Project Objectives and Costs

It is proposed that Bury draws on the successful experience of Blackburn and Darwen, and of its neighbours in Bolton, Rochdale and Oldham, which now all have ASUs, to develop a unit which can provide the same offer of short term respite and family outreach to young people and families in crisis in the borough.

The objectives of the project will be:

1. To locate and refurbish suitable premises to establish a four bed unit.
2. To recruit a staffing team of nine, including a manager, deputy and seven support workers.
3. To prepare all the protocols, policies and procedures required for applying to Ofsted to open a respite facility.
4. To deliver an outreach service to adolescents from June 2016.
5. To deliver a respite service from December 2016.

² **Alternatives to Care, Adolescent Support Unit and Beyond**, presentation by Karen Barrick, Head of Permanence at Blackburn and Darwen to the National Children and Adult Services Conference, October 2014

The decision to establish a four bed unit was informed by the similarity between actual demand for the unit reported in Blackburn and estimates of demand in Bury undertaken for this Business Case. The Blackburn unit can support around 50 cases – in Bury it was estimated that there would be between 40 and 50 suitable referrals to the unit each year (see Section 6.).³

Estimated costs to deliver these objectives are described below.

Premises – CYPC is currently working with Corporate Property Services to investigate availability of a suitable property in Bury within the public estate (Council, Six Town Housing and other statutory partners, including Health). An initial review of the Council's immediate estate did identify a number of properties but these did not meet the criteria in full – though the property may have been suitable, the location was not, and a suitable location (proximity to public transport links, recreational space, as well as the need to avoid any 'hot spots', for example, areas where there are issues around CSE) is critical to successful Ofsted registration.

To deliver the service outlined above requires a property with six bedrooms (four for children/young people and two for staff) as well as living and office space.

Assuming a suitable property is identified within the public estate, site costs will be refurbishment costs in the first year, and rent and annual running costs. Refurbishment costs are estimated at £50,000 at this stage, though this is subject to change once a suitable property is identified.

Rent will also depend on the premises available, with the possibility that if a site is identified within CYPC's estate, rent might be waived. The working assumption however is that rent will be charged, and a figure of £20,000 is used.

A more robust estimate can be provided for running costs, including regular refurbishment and renewals: within CYPC's existing estate, a property closely matching the specifications required for an ASU has annual running costs of £40,000. A further £20,000 is added to cover food and other incidental costs, including Ofsted registration (£3,000). No costs are added for food preparation as this would be undertaken by the staff and services users themselves, replicating the arrangements that would operate in a 'home' setting.

³ It is worth noting that any number less than four beds would only have a marginal impact on costs as staff account for 80% of total costs as the staffing establishment would not reduce with less than four beds because of regulated staffing ratios.

No allowance is made for business rates as an exemption can be provided at the discretion of the Council’s Director of Finance.

Staffing – A staffing establishment of nine is proposed. This is in line with Blackburn’s experience and practice and allows for the unit’s extended opening hours and compliance with regulated staffing ratios.

The unit would be run by a manager, supported by a deputy and seven support workers. All staff would be priority car users and would use their vehicles to transport children and young people to and from the unit, and out on any trips or activities.

The estimated annual cost of the staffing establishment (including unsocial hours payments, sleep-ins and car and mileage allowances and on costs at 27%) would be £325,000 in 2016/17 (allowance is made for an annual uplift of around 1% in subsequent years).

A one year fixed term post for a project manager to deliver the project would be required from October 2015. The cost would be £50,000.

Table 2 provides a summary of the on-going revenue costs of staffing and running expenses, as well as ‘one off’ project set up costs.

Table 2 Financial cost summary 2015/16 to 2017/18

	2015/16	2016/17	2017/18	2018/19	2019/20
ITEM	£000's	£000's	£000's	£000's	£000's
Revenue costs					
Staffing, including allowances		325	330	335	340
Running costs and fees		60	60	60	60
Rent		20	20	20	20
Project set up costs					
Project manager	25	25			
Refurbishment of site	50				
TOTAL	75	430	410	415	420

Ofsted – The ASUs operating in Blackburn, Bolton, Oldham and Rochdale were all developed from established children’s homes. This obviated the need to first locate suitable premises, recruit staff and then apply for registration with Ofsted, a process which is currently taking around six months from application.

Unlike its neighbours, Bury has no residential children’s homes so the option to convert an existing facility is not available. Staff must also be recruited before an application can be made to Ofsted. This extends the timeline from project inception to the opening of the Unit (see

Section 9.). However once the team is in place, and has received initial training, it can begin to provide an outreach service, pending Ofsted approval of the service's physical base and respite facility. It is anticipated that this will be in June 2016.

4. Scope

The project is to establish an ASU in Bury which will provide social care professionals with a service to which to refer children and young people who may be on the edge of care, or at risk of placement breakdown with foster carers. The unit will assess referrals and accept them on the basis of a clear support plan that sets out how the combined offer of short term respite and family outreach will address the needs of the young person and their family in preventing relationship breakdown and an escalation of need.

The unit will be open 24/7 on Fridays, Saturdays, Sundays and Mondays and open on the other days between 07:00 and 22:00. Respite stays for up to four children will be available on the days of 24 hour opening. These stays will be booked in advance, as set out in individual care plans. While receiving the service, children and young people will remain under the care of their social work professional.

The respite service and outreach service will be available to 11 to 16 year olds. Younger children (from eight to 10) and their families will be supported through the outreach service only.

5. Assumptions

- Suitable premises for the unit can be identified within the borough's public estate.
- Rent will be charged at £20,000 p.a. and initial refurbishment costs will be £50,000.
- A project manager will be recruited in the autumn of 2015 to implement the project.
- An experienced unit manager will be recruited early in 2016.
- A committed, experienced and stable team will be recruited to run the unit by May 2016.
- Ofsted registration will take six months from application.
- For an application to be made to Ofsted, the staffing team, and all policies, procedures, and protocols, must first be in place.
- The outreach team will become operational in June 2016 and the unit itself will open in December 2016.
- There will be a sufficient number of suitable referrals for the unit to be cost effective.

6. Overview of the Business Case and Benefits

It is expected that an ASU will deliver benefits through improved outcomes for young people and their families, leading to reduced expenditure on children's social care.

Modelling has attempted to quantify the number of children and young people who would benefit from referral to the unit, as well as the value of the financial saving delivered. It has focussed specifically on:

- reduced admissions into local authority care under Section 20
- accelerating the safe discharge of children and young people from placements at home
- and reduced rates of breakdown in foster placements.

Further savings will come from the referral of some cases to the ASU where Children's services is currently commissioning bespoke packages of care at home to prevent these children and young people from coming into care.

Further detail on the numbers of children and young people who might benefit from referral to an ASU, and the associated reduction in expenditure, is provided below.

Reduced admissions under Section 20

By providing a combined offer of short term respite and family outreach, the service will work to stabilise and rebuild family relationships. Family crisis, dysfunction or neglect, or socially unacceptable behaviour can lead to a child or young person entering care where social work professionals believe the family can no longer cope. Admission in these circumstances is under Section 20 of the Children's Act and is undertaken with parental consent.

In the year to 15 June 2015, 40 children and young people between the ages of 8 and 16 came into, or were already in, the care of the local authority under Section 20. This excludes children with disabilities and unaccompanied asylum seekers.

Had an ASU been available to support these children and young people and their families when they were in crisis, it is likely that a proportion of the subsequent admissions would have been prevented. Even in cases where a decision was subsequently made to take a child or young person into care, the ASU's experience of working with them would have supported effective care planning, increasing the chance of placement stability and improved outcomes.

Potential savings were estimated with reference to the cost of care currently provided and the average length of time in care. This indicates that the average cost per admission was £27,315⁴.

If it is assumed that 20 of the 40 young people identified had been referred to the unit, and half (10) had been prevented from entering care, the saving would have been equivalent to £273,000.⁵

Safe discharge from placements at home

Bury has a relatively high number of children placed at home on Care Orders with a view to discharge of the orders. Discharge is often difficult to achieve as the courts want to see robust support plans for the young people and families concerned. An ASU could make an important contribution to such plans by providing support through planned respite and family outreach.

Data indicates that in the year to mid June 2015, 22 children and young people between the ages of eight and 16 were placed on full care orders at home. None of the cases had a recorded disability. A proportion of these children would have benefited from referral to an ASU.

Rather than delivering a direct saving in social care expenditure, accelerating discharge of these children from Care Orders would free up valuable social work time. The ongoing support provided to young people and their families themselves might also prevent future crises and the risk of children entering care at a later date.

Reduced rates of breakdown in foster placements

Placement instability is an important issue for the fostering service in Bury. Generally it is bad for a young person to have two or more changes of placement in a year. An ASU would support foster carers to avoid placement breakdown and escalation of care needs from a foster placement to residential provision.

Analysis of data covering the year to mid June 2015 indicates that seven children and young people in foster care between the ages of eight and 16 had two or more placement changes in the previous 12 months.

The breakdown of foster placements has a high financial as well as human cost. For a child or young person who is already vulnerable and

⁴ During the 12 months to 15 June 2015, the 40 children and young people on a Section 20 who might have been considered for a referral to an ASU were in care for an average of 32 weeks. A third of these children were placed with in-house foster carers, a third with independent foster agencies and a third in private residential settings. By applying the average weekly cost of care in these three different settings (the average weekly cost of in-house foster care is currently £476, an IFA is £750 and a residential placement is £2,500), it is possible to derive an average weighted weekly cost of care. This is £1,242.

⁵ Rounded to nearest £1,000.

separated from their birth families it can be very traumatic, leading to escalating care needs and a move into residential care.

As the cost of a residential placement is on average around five times that of an in-house foster placement, preventing just one foster care breakdown, could deliver an annual saving of over £100,000. As a young person in a residential home is likely to remain there until they are at least 16, preventing foster care breakdown for a 12 year old could deliver a substantial stream of benefits over four years or more. The net present value of this saving would be £366,000.⁶

Reduce commissioning of bespoke packages of care

Further savings will come from the referral of some cases to the ASU where Children's services is currently providing bespoke packages of care at home to children and young people who might otherwise be admitted to care.

In 2014/15 it is estimated that the net saving delivered through such packages was £532,834. Of the 30 individuals (or sibling groups) in receipt of such packages, 12 may have been appropriate for referral to an ASU. Had such a service been available, then the saving in commissioning costs would have been £81,319 (i.e. the cost of the 12 home packages of support).

It was estimated that these 12 packages delivered a saving of £118,220. Assuming the same outcomes were achieved through the ASU, the combined saving would have been equal to £200,000.⁷

Summary of benefits

In the year to mid June 2015, it is estimated that the number of children and young people considered for referral to an ASU would have been as follows:

- 40 who were in, or came into, care under Section 20
- 22 on full care orders at home
- Seven in foster care who had had two or more placements in the previous 12 months.

Professional experience suggests that as many as half of all cases would not have been approved (for a variety of risk factors). So a reasonable assumption is that around 34 would have been successfully referred to the unit. If to this number are added the 12 cases who could have been referred to the unit as an alternative to receiving a bespoke package of care, then between 40 and 50 children and young

⁶ Discount rate applied at 3% to £100,000 over five years (£50,000 saving modelled in Years 1 and 5, £100,000 in Years 2 to 4). This gives NPV of £366,000, rounded to nearest £1,000.

⁷ £81,319 + £118,220 - rounding to nearest £1,000.

people might have been supported by the ASU in the year to June 2015.

The associated estimated annual saving in social care expenditure is summarised as follows:

- Reduced admissions under Section 20 - £273,000
- Reduced breakdown in foster placements - £366,000 (NPV)
- Reduced commissioning of bespoke packages of care - £200,000
- TOTAL - £839,000

This figure can be compared with an estimated expenditure of £430,000 in Year 1, indicating a Benefit Cost Ratio of around 2:1

Table 3 projects benefits over a four year period (full years). The savings realised through the prevention of one foster care breakdown are modelled over a four year period, beginning midyear in Year 1. As we do not know where this saving will fall in year, the midpoint is used.

Table 3 Benefits delivered by the ASU

	Year 1	Year 2	Year 3	Year 4
	£000's	£000's	£000's	£000's
25% reduction of admissions under Section 20*	275	275	275	275
Prevention of one foster placement to residential care each year				
Year 1	50	100	100	100
Year 2		50	100	100
Year 3			50	100
Year 4				50
Reduced commissioning of 'bespoke' care packages	200	200	200	200
Total	525	625	725	825

* Rounded to nearest £5,000

The figures indicate how the ASU will reduce the upward pressure on the social care budget. It is important to emphasise that at least in the short to medium term the ASU will not deliver a cashable saving. Its impact will be to reduce the rate of increased spend on children's social care.

Over a number of years, if the flow of children into care reduces relative to the flow out of care (as children already in the care system reach 18), then a *reduction* in spend on looked after children is

possible.⁸ This is the claim made for Blackburn's ASU which is evidenced by the figures on looked after children. Between 2006/07 and 2014/15 the number of 11 to 16 year olds coming into care fell from 47 to 11. Blackburn now has the smallest proportion of looked after children in residential placements in the country and the proportion of teenagers in care relative to all children in care in the borough has been declining steadily to around 17% in the last two years. This compares to the national picture of 29% for teenagers.

In order to provide effective monitoring and evidence of impact, a robust monitoring and evaluation framework will be developed from project inception. This will capture evidence of both activity and outcomes and will support an evaluation of the effectiveness of the ASU in reducing the pressure on social care expenditure.

Other benefits from investment in an ASU

The consideration of benefits so far has focussed exclusively on savings in expenditure on looked after children. This is the necessary focus of an invest to save proposal at this time. However an ASU is expected to deliver other benefits to the Council, and more broadly across the public sector.

A reduction in the demand on social workers as less children enter care and more are discharged in a timely fashion from care orders has the potential to reduce case loads.

The experience of CYPC's educational psychologists suggest that an ASU would contribute positively to educational attainment and performance. Many of the pupils at the Pupil Referral Unit (PRU) in Bury are known to social care, with difficulties at home feeding into difficulties at school and vice versa. Input from the ASU may result in the young person being better placed to interact positively with others at school, allowing them to return to mainstream schooling, which in itself would have a big impact on a young person's life chances. It would also reduce demand for the PRU.

Looking beyond social care and education, the benefits of an ASU are likely to extend to the Criminal Justice system. The Laming Review, announced this summer, highlighted the relationship between a child becoming looked after and entering prison. Looked after children are five times more likely to be convicted, or subject to a final warning or reprimand, than other children.⁹ As well as the cost in human terms,

⁸ The ASU will not be the only factor influencing the rate of entry into care. The new service will only be appropriate for children on the edge of care who can safely continue living with their families, not where children are at risk and need to come into care. If the number of such children rises faster than the rate of preventions delivered by the ASU, then overall expenditure on looked after children will continue to rise.

this comes at a high financial cost to society - the average annual fiscal cost of detaining someone in prison was £34,480 in 2014/15.¹⁰ Whilst the reasons for the relationship between becoming looked after and higher rates of detention in prison are the subject of Lord Laming's review, it seems reasonable to assume that by preventing young people entering care, the ASU will also reduce the number entering the Criminal Justice system.

7. Views of staff working within Children's Social Care

Social workers and family support workers

As part of the research undertaken for this Business Case, two sessions were held with a group of social workers and family support workers within CYPC. The purpose was to discuss best practice in supporting children and young people on the edge of care and the contribution that social care professionals felt that an ASU could make to improving outcomes.

The description of the Blackburn ASU provided by those who had visited in May 2015 matched many of the key themes of effective working identified by the group. These included having a positive attitude with young people and carers; support remaining in place for as long as needed (not just through crisis); working with the family as a whole; being family and needs led; being available; having time to form relationships and commitment from, and challenge to, other agencies.

Social Care Commissioning team The team attends a weekly Placements Forum with senior social work managers. At a meeting in July, the following case was discussed:

"J, who has special educational needs is likely to be rehabilitated home in the next few weeks to his mother. He has had a full care order since August 2014 and since then has been in two foster placements; both of which have broken down as a result of challenging behaviour and absconding.

The plan, after an assessment of mother, is to move this YP home. There are concerns about his mother's parenting capabilities and we will be putting in support from an external agency to enable this rehabilitation home to be successful. J currently attends a special education provision in Manchester which is not meeting his needs so he will be moving his school placement to an education residential placement in Wigan. The advantage of this is that if his mother cannot manage to care for J fully, we can move J into a 38 week residential

⁹ <http://www.prisonreformtrust.org.uk/ProjectsResearch/CareReview>

¹⁰ http://neweconomymanchester.com/stories/832-unit_cost_database

placement at this school which allows J to come home at weekends and holidays. The cost to the department would be £77,410 (38 weeks).

It was mentioned that had an ASU been available, we would have had the option to provide outreach support to mother and J and also respite care to enable this rehabilitation home to progress in a timely and measured way. As it is, although we will save on the cost of the fostering placement, we will be paying for agency outreach support and potentially a 38 week education / residential placement. From a stability, reassurance and confidence perspective for both mother and her son, being able to keep J at home with planned support could facilitate and develop a more positive relationship between the two of them."

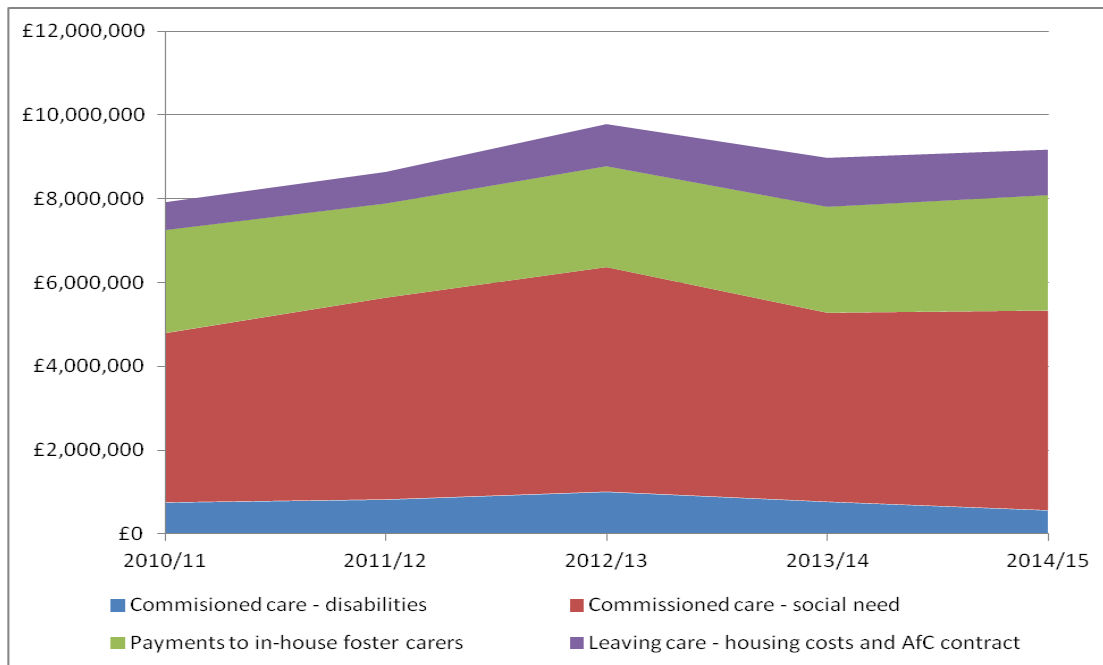
Though there is no certainty that an ASU would have been able to meet the needs of the young person in this case, in the view of the professionals attending the Forum, it would have provided a better chance of an improved outcome for J and his mother, reducing the likelihood of J entering much more expensive - and distant - residential care.

8. The Do Nothing Scenario

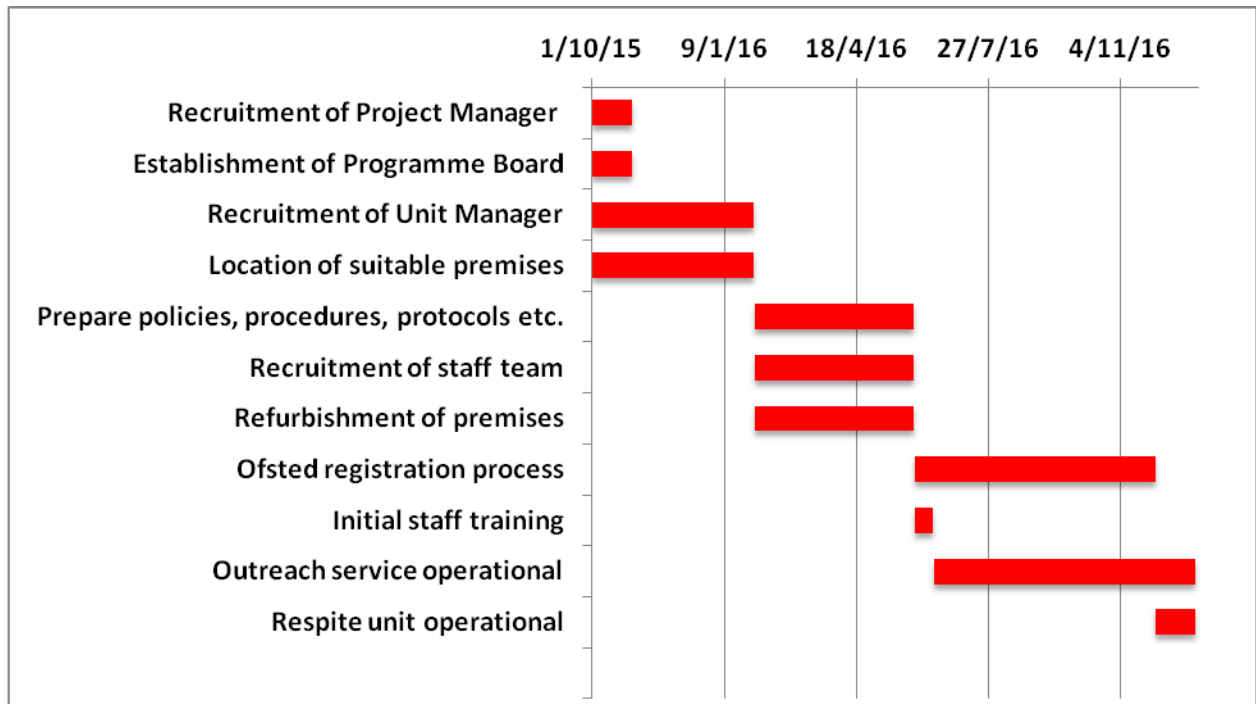
In its Spending Review on 25 November the Government will set out plans to deliver a further £20 billion of savings to 2019/20. It is widely expected that local authorities will be required to reduce expenditure over the next four years at a rate similar to that which has been required over the previous four. In the face of this, Bury Council and CYPC need to take action to reduce future expenditure on children and young people in care by investing in preventative services like the ASU.

Expenditure on looked after children already represents a very substantial part of CYPC expenditure. Figure 1 presents the total cost of providing in-house foster placements and commissioned care for Bury's looked after children from 2010/11 to 2014/15. Investment in an ASU should contribute to moderating the pressure on existing budgets and, over time, may lead to a reduction in expenditure as the inflow of children and young people into care reduces.

Figure 1 Total cost of placements for Bury's looked after children and young people, 2010/11 to 2014/15



9. Timeline for Establishing an Adolescent Support Unit



Key milestones:

1. Appointment of Project Manager
2. Appointment of Unit Manager
3. Premises identified
4. Staff team appointed
5. Application submitted to Ofsted
6. Outreach Service begins operation
7. Ofsted approval
8. Unit opens

The early appointment of a Project Manager will ensure that a governance structure for the project is established quickly, and work on both locating suitable premises and recruiting a unit manager can begin without delay.

Once in post, the Unit Manager, supported by the Project Manager, will:

- Develop all the policies, protocols, procedures and staff training plans required before submitting an application to Ofsted to register the new Unit.

- Develop referral pathways with other services, as well as protocols for working with other partners, including NHS partners and schools (PRU and mainstream).
- Recruit the staff team
- Manage the refurbishment of the premises.

The application to Ofsted cannot be submitted until these workstreams are more or less complete. Currently the time between application and approval is running at six months. Based on this, and assuming the application is approved, the Unit would open in December 2016.

Although the Unit cannot open until Ofsted approval is received, the staff team can begin to provide outreach once the team is in place and has completed initial training. This is expected to be by mid June 2016. Further training would take place over the following months to ensure that when the unit opened, all training requirements had been met.

Recommended High level project management arrangements

Position	Name	Title
Project Sponsor	Mark Carriline	Executive Director, CYPC
Senior User	Jackie Gower	AD, Social Care, CYPC
Senior Supplier (may not be known at this stage)		
Project Manager		

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Equality Analysis Form

The following questions will document the effect of your service or proposed policy, procedure, working practice, strategy or decision (hereafter referred to as 'policy') on equality, and demonstrate that you have paid due regard to the Public Sector Equality Duty.

1. RESPONSIBILITY

Department	Children, Young People and Culture	
Service	Children's Services	
Proposed policy	Establishment of an Adolescent Support Unit in Bury	
Date	5 th October 2015	
Officer responsible for the 'policy' and for completing the equality analysis	Name	Jackie Gower
	Post Title	Assistant Director, Children's Social Care Division
	Contact Number	X5715
	Signature	
	Date	
Equality officer consulted	Name	Liz Trayford
	Post Title	Planning and Research Officer
	Contact Number	X5658
	Signature	
	Date	

2. AIMS

What is the purpose of the policy/service and what is it intended to achieve?	The proposed Adolescent Support Unit (ASU) will combine a short term respite service with family outreach to provide young people and their families with a service committed to maintaining and rebuilding family and parenting relationships where these are under severe pressure. By operating from a friendly 'home' base, staffed by a dedicated team of experienced family support workers, the unit will provide a flexible offer to families in crisis which addresses both the need for family members to have 'time out', and for intensive family therapy, either on site, or at the family home. While staying on site, the unit will provide young people with a structured range of recreational and educational activities that help rebuild self-esteem and encourage team working and peer support.
Who are the main stakeholders?	Children and young people and their families Bury Council's Children's Social Care Division, including social workers and specialist teams (e.g. CSE, Children with Disabilities, Fostering and Adoption). Bury's schools, including the Pupil Referral Units Greater Manchester Police NHS services in Bury including the Child and Adolescent Mental Health Service.

3. ESTABLISHING RELEVANCE TO EQUALITY

3a. Using the drop down lists below, please advise whether the policy/service has either a positive or negative effect on any groups of people with protected equality characteristics. If you answer yes to any question, please also explain why and how that group of people will be affected.

Protected equality characteristic	Positive effect (Yes/No)	Negative effect (Yes/No)	Explanation
Race	Yes	No	The project will ensure that the ASU provides a culturally sensitive service to meet the needs of young people and their families from across the Bury community.
Disability	Yes	No	The outreach service will be available to children and young people with disabilities and their families. An overnight respite service for children with physical disabilities is already available through Home to Home carers, a service run by Bury's Fostering team. Children and young people with other forms of disability will be able to access the respite service of the ASU.
Gender	No	No	No impact - the service will be available to children and young people between the ages of 8 and 17 who meet the referral criteria and are approved by the service manager.
Gender reassignment	No	No	No impact - the service will be available to children and young people between the ages of 8 and 17 who meet the referral criteria and are approved by the service manager.
Age	Yes	No	The ASU will provide a new service to older children and young people which will have a significant positive impact on those referred. The resolution of crises and conflict will also indirectly benefit other young people including siblings, as well as other members of a child or young person's community, including friends and classmates.
Sexual orientation	No	No	No impact - the service will be available to children and young people between the ages of 8 and 17 who meet the referral criteria and are approved by the service manager.

Religion or belief	Yes	No	The project will ensure that the ASU provides a culturally sensitive service to meet the needs of young people and their families from across the Bury community.
Caring responsibilities	Yes	No	By seeking to resolve crises within families, the ASU will impact positively on the lives of parents and carers, including foster carers. Young carers may also benefit from the service.
Pregnancy or maternity	Yes	No	The ASU will be an additional resource available to support pregnant teenage girls with either respite care and/or outreach where family relationships are under pressure. For girls who are already mothers and who are struggling to remain at home, support is already available via specialist foster carers or from mother and baby units.
Marriage or civil partnership	No	No	No impact - the service will be available to children and young people between the ages of 8 and 17 who meet the referral criteria and are approved by the service manager.

3b. Using the drop down lists below, please advise whether or not our policy/service has relevance to the Public Sector Equality Duty. If you answer yes to any question, please explain why.

General Public Sector Equality Duties	Relevance (Yes/No)	Reason for the relevance
Need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	No	
Need to advance equality of opportunity between people who share a protected characteristic and those who do not (eg. by removing or minimising disadvantages or meeting needs)	Yes	Children and young people by virtue of their age are a protected group. Ensuring that they are provided with services that can meet all their needs as they develop towards adulthood is critical to their future and success as adults. The ASU will provide some of the borough's most troubled adolescents with support to address and resolve emotional and behavioural issues, thus improving their chances of developing into happier and fulfilled adults. Among these children and young people will be some with disabilities and the service will provide a new source of support for teenage girls who are pregnant and who are struggling to remain with their families. It may also provide respite and support for young carers.
Need to foster good relations between people who share a protected characteristic and those who do not (eg. by tackling prejudice or promoting understanding)	No	

If you answered 'YES' to any of the questions in 3a and 3b

Go straight to Question 4

If you answered 'NO' to all of the questions in 3a and 3b

Go to Question 3c and do not answer questions 4-6

3c. If you have answered 'No' to all the questions in 3a and 3b please explain why you feel that your policy/service has no relevance to equality.

4. EQUALITY INFORMATION AND ENGAGEMENT

4a. For a service plan, please list what equality information you currently have available, **OR** for a new/changed policy or practice please list what equality information you considered and engagement you have carried out in relation to it.

Please provide a link if the information is published on the web and advise when it was last updated?

(NB. Equality information can be both qualitative and quantitative. It includes knowledge of service users, satisfaction rates, compliments and complaints, the results of surveys or other engagement activities and should be broken down by equality characteristics where relevant.)

Details of the equality information or engagement	Internet link if published	Date last updated
<p>Gender and ethnic origin data on looked after children (LAC) coming into care in Bury, or currently in care, under Section 20 of the Children’s Act (i.e. with parental consent) is taken from Ofsted Annex A.</p> <p>In the six months to 5th October 2015 LAC under Section 20 were:</p> <p>50:50 male and female</p> <p>84% white; 11% Asian; 4% mixed background 1% unknown</p> <p>14% had a disability</p>	<p>This data is not published but is available to officers who undertake quality assurance and reporting within Children’s Social Care.</p>	<p>5th October 2015</p>

4b. Are there any information gaps, and if so how do you plan to tackle them?

Annex A does not include fields for gender reassignment, sexual orientation, religion, or marital status.

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5. CONCLUSIONS OF THE EQUALITY ANALYSIS

<p>What will the likely overall effect of your policy/service plan be on equality?</p>	<p>The ASU will advance the interests of young people, including those with disabilities, teenage girls who are pregnant and young carers. By supporting young people at a time of acute crisis where there is a risk of family breakdown, the unit will contribute to improvements in the lives of a range of groups with protected characteristics.</p>
<p>If you identified any negative effects (see questions 3a) or discrimination what measures have you put in place to remove or mitigate them?</p>	
<p>Have you identified any further ways that you can advance equality of opportunity and/or foster good relations? If so, please give details.</p>	
<p>What steps do you intend to take now in respect of the implementation of your policy/service plan?</p>	<p>A Project Manager will be appointed as soon as possible to progress the project to establish the ASU.</p>

6. MONITORING AND REVIEW

If you intend to proceed with your policy/service plan, please detail what monitoring arrangements (if appropriate) you will put in place to monitor the ongoing effects. Please also state when the policy/service plan will be reviewed.

A monitoring and evaluation framework for the ASU will be developed at the project implementation stage so that once the service goes live, systems are in place to record its activity and outcomes. The monitoring data will be used regularly by service managers to inform and improve their practice and by service commissioners to ensure that the service delivers the impact intended.

COPIES OF THIS EQUALITY ANALYSIS FORM SHOULD BE ATTACHED TO ANY REPORTS/SERVICE PLANS AND ALSO SENT TO THE EQUALITY INBOX (equality@bury.gov.uk) FOR PUBLICATION.

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REPORT FOR DECISION



DECISION OF:	CABINET
DATE:	4 NOVEMBER 2015
SUBJECT:	ALLOCATIONS POLICY – UPDATE
REPORT FROM:	COUNCILLOR RISHI SHORI DEPUTY LEADER AND CABINET MEMBER FOR FINANCE AND HOUSING
CONTACT OFFICER:	Harry Downie, Assistant Director
TYPE OF DECISION:	CABINET (KEY DECISION)
FREEDOM OF INFORMATION/STATUS:	This paper is within the public domain.
SUMMARY:	<p>The Council is required, under Section 167 of the Housing Act 1996, to have an Allocations Policy for determining the priorities and procedure to be followed in allocating its housing accommodation. The attached document satisfies that duty.</p> <p>The policy was last approved by Cabinet in March 2013 but since then there have been changes in legislation, case law and operational practice which require the policy to be updated.</p> <p>The 2015 version of the policy incorporates those changes and clarifies the Council's position regarding:</p> <ul style="list-style-type: none"> • The right to move for work legislation; • Procurement of properties for homeless households; • Applications for retirement living from existing tenants; • Bidding processes including removing the limits on the number of bids eligible and qualifying persons can make each week; • Suspension and removal from the housing register; • Occupation of adapted properties; • Bedroom occupancy and the impact of other welfare reforms
OPTIONS & RECOMMENDED OPTION	<ol style="list-style-type: none"> 1. To approve the policy. This is the recommended option. It updates the Council's allocation policy to reflect current law and clarifies procedural matters in a number of areas to assist operational decision making. 2. To not approve the policy.

IMPLICATIONS:		
Corporate Aims/Policy Framework:	Do the proposals accord with the Policy Framework? Yes	
Statement by the S151 Officer: Financial Implications and Risk Considerations:	Whilst there are no direct financial implications arising from this report, an effective allocations policy will ensure best use of the Council's housing stock, and minimise the extent of void properties.	SK
Health and Safety	There are no health and safety issues arising directly from this policy change. Service delivery and operational decision making are subject to risk assessments which are implemented in line with existing policy.	
Statement by Executive Director of Resources:	An effective allocations policy will help the Council to effectively deliver the objectives of its Housing Strategy.	SK
Equality/Diversity implications:	The Equality Analysis indicates that the proposals are positive particularly for younger single people, disabled applicants and families (with caring responsibilities). The use of dispersed properties and sensitive lettings is also seen to support community cohesion although the extent to which these can be delivered will be influenced by legislation, case law and the availability of resources.	
Considered by Monitoring Officer:	Yes The draft policy has been updated and amended to take into account legal changes and requirements.	JH
Wards Affected:	All	
Scrutiny Interest:	Overview and Scrutiny	

TRACKING/PROCESS

DIRECTOR: Executive Director of Communities and Well Being

Chief Executive/ Strategic Leadership Team	Cabinet Member/Chair	Ward Members	Partners
Scrutiny Committee	Committee	Council	
	4 November 2015		

1. INTRODUCTION

- 1.1 The Council is required, under Section 167 of the Housing Act 1996, to have an Allocations Policy for determining the priorities and procedure to be followed in allocating its housing accommodation.
- 1.2 The policy was last approved by Cabinet in March 2013 to reflect the requirements of the Localism Act but since then there have been further changes in legislation, case law and operational practice which require the policy to be updated.

2. PROPOSALS

- 2.1 The major changes to the policy are in relation to:
 - **The right to move.** This brings the policy in line with legislation requiring Councils to give preference to households moving to the area for particular types of jobs. Historical data suggests that this will not have a significant impact on application numbers and therefore any demand will be met through natural turnover of properties.
 - **Procurement of properties for homeless households.** A recent Supreme Court judgement highlighted the importance of having a clear procurement policy to support decisions on the allocation of properties to homeless people. For this reason, paragraphs 1.8 – 1.10 (page 4) have been added.
 - **Applications for retirement living from existing tenants.** With the growth in older person's accommodation and extra care schemes, the policy and banding structure has been clarified around qualifying needs. This includes giving the Head of Inclusion powers to determine transfer applications based on changes in need. This is intended to stop instances of tenants hopping from scheme to scheme.
 - **Bidding process.** The current policy limits the number of bids that an eligible and qualifying applicant can make each week. Whilst designed to reduce the amount of suitable offers declined by applicants, it has also had the unintended consequence of reducing demand for some properties, lengthening the time these homes are empty and creating increased rent loss. The new policy removes this limit. It also gives the Council powers to bid on properties on behalf of homeless residents in temporary accommodation who are unable (or unwilling) to bid for properties in their own right.
 - **Suspension and removal from the housing register (waiting list).** There has been a perception for some time that insufficient action is taken against people whose behaviour is unacceptable and that this works against the best interests of other tenants. In listening to these concerns, the new policy clarifies the circumstances under which an applicant can be suspended from the register and strengthens the sanctions that can be used where behaviour falls below acceptable levels. This change is being accompanied by changes in operational practice to identify and resolve potential issues much sooner thereby minimising the risk of escalation and more costly interventions. The type of sanction applied will therefore be dependent on the facts of each case and the willingness of tenants to positively engage with services.
 - **Occupation of adapted properties.** In line with the Strategic Tenancy Policy, these changes:
 - Reaffirm the principle of allocating adapted properties to people with assessed medical needs;
 - Authorise the matching of applicants with specific needs to properties that have already been adapted for that purpose;

- Reserve the right to relocate households from adapted properties when the intended recipient no longer requires the adaptation or no longer lives at that address.
 - **Bedroom occupancy.** The Council will continue to work with tenants affected by welfare reform to find suitable affordable accommodation that meet their housing needs. However to facilitate this work, minor amendments have been made to the bedroom standard contained in the Allocations Policy to bring it in line with the benefit rules.
- 2.2 Minor amendments have also been made to the process outlined in the Policy to reflect the move to self service and the removal of paper applications. Whilst this 'digital by default' approach has worked successfully for a couple of years, and applicants are now used to this method, the Council will continue to help individuals who need support to use the technology.

3. FINANCIAL IMPLICATIONS

- 3.1 The policy has no direct financial implications but will make better use of existing resources particularly in respect of the changes to the bidding process, utilisation of adapted properties and welfare reform.
- 3.2 It is known that Government funding will reduce in the coming years. Improving the efficiency of the process will help to contain costs, manage demand and achieve better value from existing assets.
- 3.3 Although the allocation of council housing is a statutory function, efforts will also be made to minimise the cost of administration. Legislation specifically prescribes elements of the work but the proposed changes to policy supports a shift in emphasis from simply maintaining a housing waiting list to actively working with households to access (or retain) accommodation. Prevention and early intervention will reduce duplication, minimise problems escalating and speed up decision making whilst still paying due regard to people's needs and aspirations.

4. RISKS

- 4.1 As with any change there is a risk of resistance from households that would be adversely affected. However the policy remains focused on housing need, strikes a balance between the interests of the individual with the wider community and endeavours to make better use of resources in these times of financial restraint. The provisions will be kept under review and the impact of the policy monitored to ensure that changes work as intended.
- 4.2 Not implementing the policy carries greater risks:
- The policy will not be in line with current legal requirements or benefit rules, making the policy open to challenge;
 - The current bidding arrangements are resulting in some properties taking longer to let than is necessary;
 - The strengthening of sanctions against tenants with unacceptable behaviour will not be implemented;
 - It would be more difficult to stop non-disabled tenants occupying adapted properties.

5. EQUALITY AND DIVERSITY ISSUES

- 5.1 The Equality Analysis indicates that the policy remains positive for those households with protected characteristics and by strengthening the sanctions against tenants

exhibiting unacceptable behaviour, the changes are aimed at improving cohesion within the community.

- 5.2 To accompany the policy, changes in operating practice will drive a more proactive approach to housing need. This includes a focus on preventing homelessness, early intervention with problematic households to resolve issues (not just move them around the system) and actively working with waiting list applicants to get them into accommodation.

6. CONCLUSIONS AND RECOMMENDATIONS

- 6.1 The Allocation Policy needs to be amended to reflect current legal requirements and improve process efficiency.
- 6.2 The proposed changes address these issues. They support the development of a modern, proactive approach by clearly setting out the criteria and expectations for the allocation and retention of a council house tenancy.
- 6.3 It is recommended that:
- (a) The policy is approved;
 - (b) The policy comes into effect for both current and future applicants from 1 November 2015.
-

List of Background Papers:-

Allocation Policy
Equality Analysis

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HOUSING ALLOCATION POLICY

OCTOBER 2015

CONTENTS

Section	Heading	Page
1	Introduction	3
2	Application of the Allocation Policy	4
3	Housing Register	5
4	Applying to join the Housing Register	8
5	Assessment of priorities and need	12
6	The Letting process	18
7	Direct lets	21
8	Other provisions	25
	Appendix 1 – Application Process	26
	Appendix 2 – Medical and welfare grounds for reasonable preference	27
	Appendix 3 – Priority Banding	28
	Appendix 4 – Appeals, reviews and complaints	33

1. INTRODUCTION

- 1.1 The Council is required under Section 167 of the Housing Act 1996 to have an allocation policy for determining the priorities and procedure to be followed in allocating housing accommodation. It is also good practice to publish details of the process, eligibility criteria and the key factors that will be considered when determining applications. Transparency in the process is important, so that everybody is aware of what to expect. A simple flow chart to help explain the process is attached at Appendix 1.
- 1.2 An allocation is when a housing authority allocates accommodation by:
- selecting a person to be a secure or introductory tenant of accommodation held by that authority;
 - nominating a person to be a secure or introductory tenant of accommodation held by another housing authority;
 - nominating a person to be an assured tenant of accommodation held by a Private Registered Provider (or Registered Social Landlord in Wales) (s.159(2)).
- 1.3 This document meets those requirements and sets out the Allocation Policy of Bury Council. It aims to provide a consistent approach to dealing with the housing needs and aspirations of the local population. However, the Council also understands that a small number of people have complex needs. Accordingly, the policy allows some management discretion to achieve positive outcomes for those individuals, who do not easily fit within the mainstream.
- 1.4 In preparing the Housing Allocation Policy the Council has had regard to its current Homelessness Strategy and Strategic Tenancy Policy in accordance with s 166A (12) of the Housing Act 1996 as amended by s 147 of the Localism Act 2011.
- 1.5 The general aim of this policy is to assist as many people as possible into settled accommodation, by offering applicants real choice of quality housing, whilst continuing to give reasonable preference to those in the most urgent housing need. In keeping with this aim, the policy's key objectives are to:
- Meet housing need and support the most vulnerable;
 - Create sustainable communities;
 - Balance housing needs as far as possible with customer aspirations;
 - Make best use of the Council's social housing stock;
 - Make best use of the Council's nominations rights to housing association/private registered provider properties;
 - Ensure a quality lettings service that embraces equality and diversity.
- 1.6 All housing applications must be made in accordance with the procedural requirements of the Allocations Policy. In considering applications, the Council must establish:
- If the applicant is eligible for accommodation (see Section 3.3); and
 - If the applicant qualifies for accommodation (see Section 3.4).

Eligibility and qualification will be assessed at the time of the initial application

and rechecked as and when consideration is given to allocating a property to the applicant(s).

- 1.7 Demand for social housing continues to outstrip the number of properties available and it is up to the Council to ensure that there remains fair and equitable access to what has become a scarce resource. The law requires the Council to give 'reasonable preference' to certain groups of people and this is reflected in this policy. Unfortunately, because social rented housing is in limited supply, some individuals with limited or no housing need may face a long wait. In recognition of this, the Council actively encourages alternative housing options which are both affordable and offer local people the widest choice of quality housing.
- 1.8 The Council will allocate a proportion of its stock to address the needs of individuals assessed as homeless and requiring temporary accommodation. The Council also reserves the right to discharge its duties by procuring properties and/or obtaining letting rights from other public and private sector landlords. Properties secured in this way will be of the required standard, meet the needs of the household and be affordable. Every effort will be made to locate the household within the locality to minimise disruption unless there are valid and specific reasons why the household should be housed elsewhere. The volume of units will be dependent on the level of presenting needs.
- 1.9 All accommodation will be offered in accordance with the provisions of the Housing Act and Homeless Act legislation.
- 1.10 There is presumption in this policy that all applicants (general needs, homeless and housing with support) will be offered self contained accommodation wherever possible. Bed and breakfast accommodation will not be commissioned and hostels will only be used where they form part of a wider package of support and no alternative form of accommodation is available.
- 1.11 The Council is committed to ensuring openness and fairness in its procedure for allocating housing accommodation. This policy contains a right for applicants who are dissatisfied to request an internal review of decisions that go against them. Such reviews give an opportunity for applicants to challenge the Council if they can show that the initial decision was wrong or that the policy was misapplied.

2. APPLICATION OF THE ALLOCATIONS POLICY

- 2.1 The policy applies to all vacancies in the Borough currently managed by Six Town Housing – the Council's Arms Length Management Organisation (ALMO) and any nomination by the Council to a secure, introductory or assured tenancy held by a housing association, or another person. The allocation of housing will be in accordance with the provisions of this policy. These provisions apply to all applicants on the Housing Register at the time this policy is approved, as well as to all new applications.
- 2.2 Most properties will be allocated in accordance with the Choice Based Lettings Scheme (Section 6). However the Council recognises that there maybe some exceptional situations not suitable for Choice Based Lettings. In such instances the Council's Head of Inclusion is authorised to let a property directly based on the merits of the case (see Section 7 – Direct Lettings).

- 2.3 The Allocation Policy will not apply to tenants covered by Section 160 of the Housing Act 1996. The most common circumstances are:
- (a) Where a tenant succeeds a secure tenancy on the death of a tenant;
 - (b) Where a tenancy is assigned to a person who would qualify to succeed a secure tenant;
 - (c) Where a tenancy is assigned by mutual exchange to an existing secure tenant;
 - (d) Where an introductory tenant becomes a secure tenant.
- 2.4 In addition, the policy will not apply where a priority transfer is required urgently due to a change in tenant circumstances (such as sudden medical reasons, hardship due to welfare benefit changes, etc). In these cases, the Council reserves the right to support the household through the direct let procedure (Section 7).

3. HOUSING REGISTER

3.1 Introduction

The Council is not legally required to maintain a Housing Register, but has chosen to do so to assist in assessing housing need in the Borough. This contains details of all applicants for social housing and is often known as the 'housing waiting list'. It is a single reference point for both new customers who need social housing and those who are existing tenants seeking to transfer.

Responsibility for maintaining and updating the Register lies with the Housing Assessment service.

The full register is not open to the public due to data protection. Applicants can however check their own details, to ensure the accuracy of information held.

3.2 Who can register?

- Anyone aged 16 or over except those described as 'ineligible' in Section 3.3 below or who do not meet the qualifying criteria in Section 3.4.

The Law of Property Act, 1925 prevents people under 18 from being legal tenants in their own right. It will therefore be a requirement for a third party (which maybe the local authority, a voluntary organisation or an individual over 18) to be a trustee of the tenancy until the young person attains majority. As regards payment for the rent, unless the young person can satisfy the Council, for example by proof of earnings, that she or he can pay it, an adult guarantor will be required. The guarantee covers rent and any other expenses for which a tenant would be responsible. It must be in writing, and must be in place until the young person reaches the age of 18.

Where a young person is deemed to be vulnerable and is in need of support to sustain their tenancy, a written support agreement must be in place until the young person reaches the age of 18. This will include a commitment on the part of an identified supporting agency to make regular visits and also detail how they will provide support to the young person to sustain their tenancy and develop independent living skills.

- The Council will accept joint applications – although tenancies will only be granted to persons who are eligible and qualify for social housing. Co-habiting couples will be treated in the same way as married applicants and civil partnerships; except that evidence of an abiding relationship will be required before a joint tenancy is awarded.
- British Forces Posted Overseas (these will be treated as if resident in the UK)

3.3 Ineligible applicants

Under Housing Law, the Council cannot allocate housing to anyone (or jointly with someone) that is not eligible to join the Housing Register. Those ineligible are outlined in Section 160ZA of the Housing Act 1996 as:

- Persons who are subject to immigration control, or who do not satisfy resident requirements as detailed in the Code of Guidance on allocations;
- Persons prescribed by the Secretary of State as being ineligible.

Where two or more people apply and one of them is eligible, the Council may grant a tenancy to the person that is eligible providing the qualification criteria is met (paragraph 3.4). In addition, while ineligible family members cannot be granted a tenancy, they may be taken into account when determining the size of property, for which they can bid (see Section 5.5)

3.4 Qualification

The Council may only allocate accommodation (Section 3.8, Allocation of Accommodation Guidance 2012 as amended by the Allocation of Housing (Qualification Criteria for Right to Move) (England) Regulations 2015) to people who have been defined as 'qualifying persons'. For the purposes of this policy, a 'qualifying person' shall be a person to whom the Council would give reasonable preference to, because of their housing need, under s.166A(3) of the Housing Act 1996. These are:

- People who are homeless (within the meaning of Part 7);
- People who are owed a duty by any local housing authority under Section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3);
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;
- People who need to move on medical or welfare grounds (including any grounds relating to disability);
- People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or others); and
- People who satisfy the criteria to move for work as set out in the 2015 Regulations.

Members of the Armed Forces will be assessed in accordance with any special provisions that are applied to this category of applicant by legislation.

Whilst applicants may satisfy the reasonable preference criteria, the Council will

disqualify individuals that do not meet certain conditions expected of tenants. Each case will be assessed on its merits, but in drafting those categories, the Council's main aims are:

- To ensure that bad behaviour is not rewarded, by the allocation of a valuable and scarce resource;
- To prevent those who have a prior history of not properly maintaining a tenancy from accessing social housing;
- To ensure that no-one is set up to fail. Anyone who needs support to manage a tenancy must have that in place before they are granted a tenancy;
- Not to penalize those who have a good previous track record as a tenant.

With those principles in mind, the following persons are likely to be deemed unsuitable for registration on the housing waiting list:

- Those with a history of rent arrears (with the Council or any other landlord) of, or exceeding, two calendar months;
- Those with a history of unacceptable behaviour, i.e. conduct by the applicant or a member of the household which would, if the applicant were a secure tenant of the Council, entitle the Council to an order for possession. In particular, those who have been evicted from previous accommodation because of their behaviour, or that of members of their household or who have had any form of injunction relating to anti-social behaviour imposed on them;
- People who have previously failed to maintain accommodation offered to them, or who have caused deliberate damage to any such property;
- Persons incapable of managing a tenancy. This may include:
 - Children aged below 16;
 - Applicants aged between 16 and 18 who are considered vulnerable, unless they are engaging in a suitable care and support package;
 - People who require extensive social or medical care/package in order to manage a tenancy, unless a suitable care and support package is in place;
- House owners – unless they can demonstrate health or support needs that would be best met by social housing through, for example, retirement living or extra care.

Where an existing tenant loses their tenancy due to arrears, anti-social behaviour or a failure to maintain their property – and cannot be disqualified because the homeless duty applies, the Council reserves the right to place the tenant on licence in another property or apply conditions as part of a Family Intervention Tenancy until such time as the homeless duty is discharged or the tenant finds alternative suitable accommodation. During this period, the tenant will be disqualified from joining the housing register (or be suspended if they are already an applicant) until such time as the debt is cleared or they can demonstrate that their behaviour has improved. This action does not stop the tenant receiving housing advice or support to find alternative accommodation.

In deciding whether an applicant with extensive social or medical/care needs can manage a tenancy, the Housing Assessment service will be advised by medical professionals and other relevant agencies as appropriate. Where such applicants need support to sustain their tenancy and/or live independently, the Housing Assessment service must be assured that a suitable care package is in place before the applicant can be considered for registration on the housing

waiting list.

Where an older applicant applies for retirement living options, there will be a presumption against accepting applications from individuals already living in a sheltered housing scheme or property designated for older people unless it can be shown that the existing accommodation is no longer suitable for their needs. It will be at the discretion of the Head of Inclusion as to whether to accept such applications.

Entitlement to join the Housing Register will be assessed at the date of application and at any subsequent periodic review of an application, or at the time of any offer. An applicant may become ineligible or cease to be a qualifying person if any of the criteria for disqualification comes to apply to them while they are on the register.

Where an applicant is, or becomes ineligible, or deemed not to be a qualifying person, they will be notified in writing of the decision, the grounds for it and their right to a review. All decisions will be subject to the provisions outlined in Appendix 4 – Appeals, Reviews and Complaints.

If a person is found to be ineligible to join the Register, they may make a new application if and when the grounds for ineligibility no longer apply.

Individuals who do not qualify for social housing can still be offered advice by the Housing Assessment service to access an alternative housing solution. This could include private rented accommodation, supported housing, low cost home ownership, or help to remain in their current home.

4. APPLYING TO JOIN THE HOUSING REGISTER

4.1 The Application process

All applications will be internet based using the online application form provided by the Council. The applicant will need to provide clear answers to questions raised by the Council, to enable a proper assessment of their circumstances.

It is recognised that certain applicants will have difficulties using the 'digital by default' option. Applicants and potential applicants that cannot use technology will be offered support, appropriate to their needs to avoid exclusion. Free and confidential advice on applying for housing will remain available on request from the Housing Assessment service.

Applications should contain details of all members of the household to be re-housed. A household is defined as any person who normally lives with the applicant(s) or might reasonably be expected to reside with them. Such cases may include children who are being fostered or live-in carers.

Two forms of documentary evidence will also be required from the applicant (or all named individuals in the case of joint applications) to confirm:

- (a) Their identity.
- (b) Their current residence. **All applicants must provide a current correspondence address at the time of application. In the case of individuals who have no fixed abode, they must be prepared to**

visit Housing Connect and Direct (CAD) Reception each week to collect any correspondence. Failure to attend on two consecutive weeks, without prior notice will result in removal from the Register

Acceptable evidence for (a) and (b) above includes passports (or a driving licence with photograph), birth certificates, a current tenancy agreement, utility bills, or official correspondence (Council tax bill, proof of welfare benefits, etc), which is dated within the last 3 months and states the applicant's name.

Where an applicant is unable to submit proof of identity or residence electronically, they will be required to attend in person, or post in the required documents to the Housing Assessment service before their application is processed.

In exceptional cases, if the readily acceptable documentary evidence cannot be produced, a manager within the Housing Assessment service may authorise acceptance of other documentation.

In order to establish the accuracy of an application, further documentary evidence may be required to verify claims.

Applications not properly completed, made by ineligible individuals, or not supported by the necessary documentary proof of identification and residence, will not be processed.

The Council undertakes a review process every six months to ensure that all of the information provided is up to date. Eligibility to be registered for housing and the priority afforded under this scheme are kept under constant review. It is up to the applicant to notify the Council of any change in circumstances, such as someone joining or leaving the household, change of address, the purchase or acquisition of a property, or a change in the health or welfare of the applicant and/or a member of their household.

Making a false statement on an application form will result in the application being cancelled and any offers made withdrawn. If an applicant secures a tenancy as a result of false information, the Council will be entitled to seek possession of the property. Failure to disclose a material change in circumstances could result in an application being suspended or cancelled.

Failure to bid on properties during any six month period may also result in the applicant being removed from the register.

4.2 Access to information

Registration will be based on the information supplied by the applicant on-line. Upon registration, the applicant will receive an acknowledgement together with:

- Information about their position on the Housing Register (banding) and how that was calculated.
- Whether preferred accommodation is likely to be available and an indicative waiting time based on the average for that band over the past year.

General information such as banding criteria, changes in legislation/guidance, etc will be made available through a number of sources, e.g. the Bury Council

website, newsletters and other publications.

Applicants can however request in writing from the Housing Assessment service, access to more specific information held in connection with their application including:

- Their details on the Housing Register;
- The documentation provided by them;
- Any other information held about them on file;
- Decisions made on the facts of their case. This does not affect their right to appeal, or request a review.

The Council's Allocation Policy, Strategic Tenancy Policy and Homelessness Strategy are also available to applicants on the Council's website.

4.3 Cancellation of housing applications

Except in exceptional circumstances, a housing application will be removed from the Housing Register if:

- The applicant requests it;
- The applicant becomes ineligible for housing or ceases to be a qualifying person;
- The applicant is housed through the Allocation Policy;
- A tenant of any social housing completes a mutual exchange;
- An applicant wilfully submits false information regarding their eligibility, or household circumstances to gain advantage;
- An applicant fails to maintain their housing application (through the renewal process), or they move home and fail to provide the Council with a contact address;
- An applicant fails to respond to a request for further information, within a reasonable time. **The local authority has defined an appropriate time as 2 weeks, after which time a cancellation letter will be sent to the applicant.**

Any decision that an application has been cancelled will be notified in writing and the applicant will be told the grounds for it and their right to a review. All decisions will be subject to the provisions outlined in Appendix 4 – Appeals, Reviews and Complaints.

4.4 Suspension from the Housing Register

The Council reserves the right to suspend an applicant from the Housing Register where their actions fall below that expected of a tenant. Suspension from the Housing Register does not mean that the applicant has been removed from the Register, but that the applicant cannot 'bid' for properties under this scheme, nor be eligible for a direct let.

An applicant may be suspended from the register if:

- The applicant, or a member of the household, has engaged in anti-social behaviour that would not be sufficiently serious to entitle the Council to seek

possession of their home if the applicant was a tenant of the Council, but which has nonetheless caused other people a nuisance or annoyance.

- The applicant has housing related debts which do not demonstrate a persistent failure to pay rent but raise concerns over their commitment to keep a clear account. Examples of these types of debt include:
 - Outstanding arrears from a current or previous tenancy in the public or private sector;
 - Arrears of rent, service charges and/or other recharges accruing from current or previous stays in temporary accommodation;
 - Outstanding arrears on repayments due following previous interventions by Housing Assessment (e.g. rent in advance, deposit loans, etc);
- Applicants who deliberately act in a way, (or conversely fail to do something) that results in a worsening of their personal or housing circumstances.

In the case of suspension for arrears the Council will take into account any delays in regular payments of Housing Benefit that has resulted in arrears. Each case will be assessed on its merits but as a general rule, an applicant will need to be in arrears of at least two calendar month's payments before the application will be suspended.

An applicant who is suspended from the Housing Register because of a housing related debt will be suspended until the debt is cleared or there has been a sustained effort to pay off the debt, through agreed payments for at least six months. Written proof of regular payments must be provided to the Housing Assessment service, before a suspension can be lifted from the Housing Register.

An applicant who is suspended because of their behaviour or that of a member of their household will remain suspended, until such time as they can demonstrate that their behaviour has improved.

Suspension from the Register is not intended to be permanent, but there is no time limit. Reinstatement will be sooner, if the applicant takes personal responsibility and addresses the reasons for suspension. The period of suspension will not count towards the applicant's length of time on the waiting list.

Suspension from the Housing Register will be overruled when:

- There is an urgent need to move because of a critical medical or welfare need, including emergencies and situations where there are serious safeguarding implications
- An emergency transfer has been approved because of harassment, domestic violence or hate crime. Under these circumstances any application will be dealt with under the Direct Let provision (see Section 7.)
- The applicant needs to move out of their home (temporarily or permanently) in order to allow repairs, or redevelopment to take place
- An applicant affected by welfare reform is under-occupying a family home that has three or more bedrooms and they are willing to transfer to a home with fewer bedrooms

- The applicant is occupying an adapted home and is required to transfer to a home that is more appropriate to their needs.

Such cases will be assessed on their merits to avoid inconsistency with the wider aims of the Allocation Policy.

As an alternative to suspension, the Council may place the applicant in Band 5 for twelve months, after which period the applicant may request to have their application reassessed under this policy. This approach is more likely to be applied to individuals who deliberately act in a way (or conversely fail to do something) that results in a worsening of their housing circumstances.

Any decision to suspend a person from the Housing Register will be notified in writing and the applicant will be told the grounds for it and their right to a review. All decisions will be subject to the provisions, outlined in Appendix 4 – Appeals, Reviews and Complaints.

5. ASSESSMENT OF PRIORITIES AND NEED

5.1 Applying priority and need

Once an applicant has been deemed to be eligible and a 'qualifying person', the Council will determine the applicant's need and priority. This involves a number of stages:

- (i) **Assessment of need.** The Council will decide what, if any, further information or follow up action is required to determine the priority of individual cases. This may include seeking further advice from medical or other professional agencies (Section 5.2).
- (ii) **Ascertaining local connection.** The Council will consider whether the applicant has a local connection with Bury (Section 5.3)
- (iii) **Banding.** Persons accepted onto the Housing Register will be allocated a band according to the information provided (Section 5.4). The banding system is detailed in Appendix 2.
- (iv) **Property size.** The Council will determine, based on the household composition, the size of property for which the applicant is entitled to bid (Section 5.5).

Following those assessments, an applicant will be registered, notified of their priority and of the property size they have been assessed as requiring. An applicant is then entitled to bid for suitable properties that become available (Section 6).

5.2 Assessment of needs

5.2.1 Assessment of medical needs

Assessment of medical needs will only be considered for applicants, or a member(s) of their household, where current housing arrangements adversely impact on health, the ability to access basic amenities, or if the applicant is homeless and requires a particular type of housing due to their medical need. In these cases, evidence from a relevant health professional must be provided to substantiate this. Categories of people to whom this may apply are illustrated in Appendix 2.

The Council will assess priority initially on the declaration made as part of the application and completed medical self assessment submitted by the applicant.

If the self assessment shows a high (or overwhelming) medical need for re-housing, the applicant will be required to provide corroborating evidence from a medical professional (Occupational Therapy, Psychiatric reports, Specialist or Hospital Consultant letters/reports). It is not necessary to obtain a letter from a GP.

In some cases, the Council may seek further information from the applicant's GP or other health professionals. The Council may also conduct a home visit, to assess housing conditions and verify statements made in the application before awarding a banding for the Housing Register.

If an applicant or a member of their household has a substantial or permanent physical disability, which place them in Category 1, 2 or 3 as listed below, the Housing Assessment Team will seek advice from an Occupational Therapist as regards to specific housing needs:

Category 1 – Applicants who require wheelchair accessible property (i.e. a property that is already adapted for a wheelchair or is suitable for adaptation to the level required)

Facilities will include:

- Ramped or level access in and out of the property.
- Adequate wheelchair circulation space in hallways and main rooms occupied by wheelchair user.
- Widened doorways
- Level wheelchair access to all basic amenities or access via wheelchair lift
- Accessible kitchen
- Adequate circulation space for wheelchair in bathroom.

Category 2 – Applicants who require accessible property (i.e. a property which is already adapted to mobility standards, or is suitable for adaptation to the level required)

Facilities will include:

- Ramped or level access in and out of the property.
- Adequate circulation space for mobility aids in hallways and main rooms occupied by applicant.
- Level access to all basic amenities or access via stair-lift/through floor lift
- Adequate circulation space in bathroom for mobility aids or for assistance from carer if needed.

Category 3 – Applicants who have low level mobility needs (i.e. they require a general let property where potential for further adaptations is restricted)

Facilities will include:

- Level access or shallow steps.
- Bathroom may have been adapted with level access shower or shower over the bath which is not accessible for a wheelchair user or applicant with significant mobility problems.
- Doorways may not be suitable for widening and circulation space in hallways is restricted.

To make best use of resources, the Council will, in the first instance, seek to match applicants with specific needs to properties that have already been adapted for that purpose.

Tenancies will be granted for as long as the applicant (or the member of the household for whom the adaptation is intended) continues to live at that property. The Council reserves the right to work towards relocating households from adapted properties when the intended recipient no longer requires the adaptation or no longer lives at that address.

Applications from people with mental health needs will be referred to a multi-disciplinary panel for assessment. This panel will include a Mental Health professional and other housing support agencies in the borough as appropriate.

5.2.2 Assessment of welfare/social needs

If the applicant or someone in their household has to move home because of multiple welfare or social needs, which are not covered by the banding categories, the Council's Head of Inclusion has discretion to award a higher banding priority for that application. The applicant must however be able to demonstrate the presence of multiple needs. Examples may include:

- A family member with multiple welfare or care needs e.g. an individual with disabilities suffering harassment in their current location;
- Living with a long term medical condition in an overcrowded property that has damp problems;
- Single frail, elderly person with mobility problems facing eviction;
- More than one family member with welfare or care needs.

Where an applicant's needs are assessed, the results will be notified in writing, together with the grounds for the decision and notification of the right to a review. All decisions will be subject to the provisions outlined in Appendix 4 – Appeals, Reviews and Complaints.

5.3 Local connection

The Council aims to give local people priority for homes. Those who meet the local connection criteria will be placed in Bands 1 – 4 according to their level of housing need. If the applicant does not have a local connection, their application will be placed in Band 5. To have a local connection, the applicant or a member of their household must demonstrate one or more of the following:

- Have been living in Bury (through choice) for the previous 24 months or at least 3 out of the last 5 years;
- Currently have permanent employment within the Borough;
- Have close family living in the Borough for the last 5 years (for example parents or children);
- Have special reason for needing to live in the Borough (for example to care for a relative or receive care from their family).

In exceptional circumstances, an applicant who does not currently reside in Bury may be placed in Bands 1-4 according to the level of housing need

provided one or more of the four conditions listed above also apply.

The local connection criteria will not apply to persons for whom the Council has a legal duty to re-house.

The local connection criteria will not apply to members of the Armed Forces, who are serving away and wish to re-establish their link with Bury.

5.4 Banding

In line with the qualification criteria (Section 3.4), the banding has been designed to give reasonable preference to those with housing needs as outlined by S.166A (3) of the Housing Act 1996:

- People who are homeless (within the meaning of Part 7);
- People who are owed a duty by any local housing authority under Section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3);
- People occupying insanitary or overcrowded housing or otherwise living in unsatisfactory housing conditions;
- People who need to move on medical or welfare grounds (including any grounds relating to disability); or
- People who need to move to a particular locality in the district of the authority, where failure to meet that need would cause hardship (to themselves or others).

Persons accepted onto the Housing Register will be allocated a band according to the information provided and this may change over time in line with changing circumstances. The Council will also seek to recognise multiple needs. Applicants who match three or more factors in any one band (except for Band 5) will be automatically moved to the next band up to reflect cumulative housing need.

Where a household could arguably be placed in different bands, the higher of the two bands will apply.

The Council may move to Band 5 any applicant (or household member) who behaves in a way that would affect their suitability as a tenant. This is likely to be applied where applicants act in a way (or conversely fail to do something) that results in a worsening of their personal or housing circumstances but may also be applied as a sanction in relation to:

- Housing related debt (rent arrears, current or former arrears of service charges/recharge payments, etc.) owed to the Council or other landlord);
- Applicants under a possession order or subject to sanctions under anti social behaviour legislation;
- Vandalism, deliberate damage or neglect of property and neighbourhood amenities;
- Breaches of tenancy or licence conditions.

An applicant will be notified in writing of the band in which the application is

placed, together with the grounds for the decision and notification of the right to a review. All decisions will be subject to the provisions outlined in Appendix 4 – Appeals, Reviews and Complaints.

Details of the banding structure are attached at Appendix 3.

5.5 Assessment of property size

The following table sets out the size of property that a person on the Housing Register is entitled to bid for. Generally two children of the same gender will be expected to share a bedroom.

Household size	Property size
Single person	Bedsit / 1 bed
Single person with staying access to child/ children	1 or 2 bed
Single person over 60	Bedsit / 1 bed / bungalow / ground floor flat / retirement living / extra care housing
Couple no children	1 bed
Couple with at least one partner over 60	1 bed / bungalow / ground floor flat / retirement living / extra care
2 person household with special needs (includes single person with resident carer)	2 bed / bungalow / ground floor flat / retirement living / extra care
Couple or single parent with 1 child	2 bed
Couple or single parent with 2 children	2 or 3 bed (depending on age and sex of children)
Couple or single parent with 3 children	3 bed or more (depending on age and sex of children)
Couple or single parent with 4 or more children	3 or more (depending on age and sex of children)

Note 1: Bungalows will be allocated to applicants who are either aged 60 or over, or who have a proven medical need for ground floor accommodation. Bungalows adapted to meet the needs of wheelchair users or severe mobility problems will be offered to those who have been assessed as needing that type of property.

Note 2: Retirement living units will only be allocated to applicants aged 60 or over

Note 3: There are very few homes with 4 beds or more and these are only available in certain parts of the Borough. Larger families can bid for anything above 3 beds but are advised to work with the Council to explore all their housing options

Note 4: Where a child has 2 principal homes due to joint custody arrangements, the Council may allow the applicant on receipt of written evidence to this effect to bid for homes with one more bed than they would otherwise be eligible for

Note 5: Where official joint custody has not been decided, but an applicant has requested an extra bedroom, a decision will be based on which parent receives Child Benefit. If that parent is not the applicant then a bedroom for that child will not be awarded. Proof of who received the Child Benefit will be required to facilitate this.

Note 6: Separate space for a resident carer will only be considered where there is clear evidence that the care is not provided by a member of the household (or someone who would otherwise live with the applicant)

Note 7: Separate space for potential foster children will be considered from applicants who have been approved as foster parents by the Council

An applicant will be notified in writing of the property size for which they have been assessed as eligible, together with the grounds for the decision and notification of the right to a review. All decisions will be subject to the provisions outlined in Appendix 4 – Appeals, Reviews and Complaints.

5.6 Under Occupancy

The Council has a limited supply of family sized accommodation and adapted properties. In order to free up these properties to meet expressed demand, this policy allows for the Head of Inclusion to identify under occupied properties and agree, in consultation with the housing provider and tenant, a property exchange. This is subject to the under occupying household vacating the property when an allocation has been made to them. The Council will provide options to encourage residents to downsize, but will not force them to move if they do not wish to.

These provisions will apply to secure tenants who:

- Occupy a general needs family property with two or more bedrooms;
- Occupy a property that has been adapted for disabled access (Category 1 or 2);
- Agree to transfer to smaller accommodation (or a non-adapted property) in line with their needs and provide vacant possession of their present home.

Discretion will be applied to allow downsizing to smaller properties, but with flexibility to allow down-sizers to obtain properties, technically larger than their needs. For example, a single tenant living alone in a four bedroom house may be unwilling to downsize to the one bedroom property which they would ordinarily qualify for under the assessment of property size (see Section 5.5 above). In such cases, it will be at the discretion of the Head of Inclusion to allow an additional bedroom to be awarded, particularly where the tenant has the need to accommodate dependent children or live-in carers. However, the tenant must appreciate the implications on their welfare benefit and any change must be accompanied by a test of affordability.

Tenants affected by the changes of the Welfare Reform Act 2012, will be given priority to downsize their accommodation.

6. THE LETTING PROCESS

6.1 Bury Choice Base Lettings

In accordance with Section 167(1A), the majority of properties will be made available through a system of Choice Based Lettings (CBL) offering people on the Housing Register:

- A choice of housing accommodation;
- The opportunity to express preferences about the housing accommodation to be allocated to them, which are appropriate to their housing need as set out in the assessment of property size.

Under CBL, applicants express an interest or 'bid' for properties that they are interested in.

6.2 Process for property allocation

1. The Housing Assessment service will be advised by Six Town Housing of all empty properties available for letting.
1. Each property will be advertised weekly on the Bury Council Housing website and other media throughout the borough.
2. Applicants express an interest on advertised properties on-line (or through a key/support worker where appropriate). There is no restriction on the number of bids that an applicant can make.
3. Where a person or household has been accepted as homeless and is resident in temporary accommodation but fails to bid on suitable properties that become available, the Council reserves the right to bid on their behalf;
4. The expression of interest is registered by the Council.
5. At the close of each weekly cycle, successful bidders will be determined in accordance with priority (see Section 5.1). Where there is more than one successful bidder for the same property based on priority need, the Council will take into consideration the following factors to identify the preferred bidder:
 - Length of time on the waiting list.
 - Medical conditions.
6. The housing provider will contact the successful bidder
7. References are taken and the applicant's information updated.

6.3 Suitable offer

A successful bid made through the CBL system will be counted as one suitable offer. "Suitable", for the purposes of this policy, means:

- Fit and available to live in;
- Suitable in relation to affordability;
- Suitable for any specific needs relating to medical conditions or disability;
- Of adequate size without causing statutory overcrowding.

Where a bid has been successful and the applicant declines a suitable offer of accommodation their application will be reassessed. This may result in removal from the Housing Register.

Homeless applicants have a statutory right to request a review of the suitability of accommodation offered to them, regardless as to whether they accept the offer or not although any such review is outside of the review procedures under this policy. Pending a review of the decision their application will be placed in Band 5.

6.4 Withdrawing an offer of accommodation

Any offer of accommodation may be withdrawn where:

- The applicant has made a false declaration, or failed to provide the Council with up-to-date information on their circumstances; a false declaration will also result in their application being cancelled.
- The property details at the time that the written offer was made were incorrect and it was subsequently discovered that the size and type of the property is not, in fact, suitable to the applicant's needs; this will not affect the applicant's right to bid on future properties
- The applicant's circumstances change between the offer and the signing of the tenancy agreement (resulting for example in a significant reduction or increase in the level of need, or that the applicant has ceased to be eligible or a qualifying person).
- If the references taken at the time of the offer demonstrate that the applicant has ceased to be a qualifying person or has housing related debt, the Council may withdraw the offer and revise the applicant's priority.
- The property is no-longer appropriate for that person.
- The property is required in an emergency to meet the Council's civil contingency responsibilities.

6.5 Restrictions on bidding for properties

Bids for properties will not be accepted from individuals who:

- Have not been accepted onto the Housing Register;
- Have been removed from the Housing Register;
- Are not capable of independent living or sustaining a tenancy;
- Can only sustain a tenancy if they are provided with support, and support is not currently being provided;
- Are still being assessed. Bids can only be accepted, once eligibility and priority banding has been determined/reviewed;
- Have had their right to bid suspended by the Council. Circumstances where this may apply includes:
 - a) Failure to provide relevant information in their application or subsequent information has come to light that the applicant may no longer be a 'qualifying person' or their housing circumstances have changed.
 - b) Repeated failure to attend viewings of properties for which they have bid and been shortlisted. 'Repeated failure' in this instance is defined as not attending viewings, without good reason, on three consecutive occasions;

- c) Refusal without good reason, of a formal written offer of property for which the applicant or their representative has made a successful bid.

If the grounds for failing to view properties or refusing an offer are not considered by the Council to be justified, any bids will be rejected and the applicant placed in Band 5 for 12 months, after which period the applicant may request a reassessment of their application under this policy. Where relevant information is missing or has been withheld, suspension from bidding will last until the application is updated and/or reviewed by the Housing Assessment service. If the applicant is found to have deliberately misled the Council for personal gain, the applicant will be removed from the Housing Register.

Where the applicant is restricted from bidding, they will be notified in writing together with the grounds for the decision, any conditions that will need to be met before the restriction is lifted, the date when the suspension expires (if appropriate) and notification of the right to a review. All decisions will be subject to the provisions outlined in Appendix 4 – Appeals, Reviews and Complaints.

A restriction on bidding is not the same as suspension from the Housing Register. Applicants restricted from bidding can still count this period as time on the waiting list; persons suspended from the Housing Register cannot.

6.6 Local Lettings Policies

Local letting policies are there to respond to specific local issues. These may include particular housing concerns on estates or other social issues in the community. Only a small proportion of the housing stock will be affected by these policies.

Government and good practice guidance encourages Councils to aim for the following in developing local letting policies:

- Protecting balanced and mixed communities;
- Reducing property void rates and tenancy turnovers;
- Improving community stability and cohesion;
- Tackling low demand areas and difficult to let estates;
- Reducing anti-social behaviour;
- Preventing future problems occurring on new estates or recently modernised properties.

Where a local area or estate would significantly benefit from a local lettings policy, the Council will work with the housing provider to develop a clear rationale for its introduction, outline the objectives to be met (together with appropriate measures of success) and ensure that reasonable preference is given to people in priority need. All policies will also be accompanied by an Equality Analysis, to minimise the risk of direct or indirect discrimination against individuals or groups.

A multi agency panel, comprising of all the different partners in Bury will support the development of the local lettings policies.

Each local letting policy will include:

- The scope of the policy such as geographical coverage, housing stock profile turnover rates of tenancies, property void levels, tenant profiles, etc;
- The expected review/expiry date of the policy;
- A clear rationale for the policy including evidence of the problems/issues that the policy is seeking to resolve;
- The methods that will be used to address the problems/issues;
- An assessment of any possible negative impacts of the policy;
- How the policy links to Bury Council's strategic objectives;
- Full details of consultations which have taken place in developing the policy;
- How the policy will be monitored;
- Proposals for reporting and reviewing policies.

When a property affected by a local lettings policy is advertised, the details will clearly state the criteria or conditions that apply. Applicants must fulfil these requirements for their bid to be successful.

7. DIRECT LETS

7.1 Circumstances appropriate to direct lets

There are times when the Choice Based Letting System is unsuitable to meet the needs of certain applicants. To address this situation, the Council reserves the right of direct letting. Circumstances where direct lets could apply include:

- The safeguarding or protection of applicants and existing tenants for reason of domestic violence, harassment or hate crime or where the Multi Agency Public Protection Arrangements (MAPPA) or National Witness Mobility scheme has recommended that an applicant should not bid for fear of being identified;
- The accommodation of applicants who present with complex needs;
- Households recommended for, or subject to, a Family Intervention Tenancy (FIT);
- Applicants that have been under-occupying and require re-housing to a smaller property due to hardship or affordability issues;
- Allocating homeless households to temporary accommodation through the Community Resettlement Service;
- Applicants requiring specially adapted properties;
- Re-housing tenants who are vacating a specially adapted property or large family home in favour of an applicant on the Housing Register to whom the property is more suited;
- Retirement living accommodation, extra care units or properties designated for elderly applicants;
- Civil contingency emergencies, meeting the Council's obligations (such as refugee crises) and the allocation of properties that fail to attract bids.

The Council reserves the power to make as many direct let offers as it thinks fit to meet the needs outlined above. The Council will, however, ensure that the

number of offers under direct lets remains a small fraction of total lettings. The majority of properties will continue to be let through Choice Based Lettings.

When direct letting properties, the Council will make one suitable offer which as far as possible matches the size and type of property to the needs of the applicant and is not in an area known to be unsafe for the household. If the applicant decides to refuse the offer, they must give their reasons for refusal in writing.

If the grounds for refusal are not considered by the Council to be reasonable, the offer will be withdrawn and the applicant placed in Band 5 for 12 months, after which period the applicant may request their application to be reassessed under this policy. For the avoidance of doubt, this is not an automatic suspension from the Housing Register. Applications will remain registered provided the applicant continues to meet the eligibility and qualification criteria; the onus however will shift onto the applicant to bid for properties.

An applicant will be notified in writing of any reduction in banding together with the grounds for the decision and notification of the right to a review. All decisions will be subject to the provisions outlined in Appendix 4 – Appeals, Reviews and Complaints.

Where applicants are not satisfied with the offer, rather than refuse and have their housing need priority removed, they may accept the offer subject to review. Further information about reviews is set out in Appendix 4.

The Allocation Policy aims to ensure that properties are let within a reasonable period of time. However, where substantial adaptations are necessary, properties may have to remain empty for longer than would be desired. Every effort will be made to keep delays to a minimum whilst ensuring the necessary works are carried out to meet the applicant's needs.

There is no fixed number of properties set aside for direct lets, temporary accommodation or other purposes; the level will be based on need and reviewed annually.

7.2 Sensitive Lets

The Council recognises that some groups can have greater difficulty integrating into communities. In the interests of community cohesion, the Council will exercise extra sensitivity where applicants have complex or special needs and may directly let properties in these cases; particularly if anti social behaviour could result. Such decisions will be made on a case by case basis and approved by the Head of Inclusion.

7.3 Older applicants

The council has traditionally made a small number of direct offers to applicants aged 60 and over who, because of their personal circumstances, or other special reason, should in the Council's view receive such an offer. The Council reserves the power to continue to make such offers to extra care and retirement living options where it considers it appropriate to do so.

7.4 Succession and discretionary offers

Statutory Succession

When a tenant dies, it may be possible for someone living with them to take over the tenancy. This is known as succession and the person who takes on the tenancy is called a 'successor'.

To qualify to be a 'successor' the applicant has to meet certain conditions:

- They must live in the property as their only or main home at the time of the tenants death;
- They are the tenant's spouse or civil partner;
- They are another member of the tenant's family and have been living with the tenant for at least 12 months prior to the tenant's death.

If the property does not meet, or exceeds, the housing needs of the person taking over the tenancy, the Council has the right to offer them another suitable property.

A tenancy can only be succeeded to once.

Applications to take over a tenancy must be made in writing within one month of the tenant's death. If no application is received within the timescale, the tenancy will be ended. If more than one person qualifies to take over the tenancy, the housing provider will determine the most suitable person.

If the tenancy is of an introductory or demoted nature, the successor will also become an introductory or demoted tenant with the same conditions.

Succession will not be allowed when:

- The deceased tenant had previously succeeded to the tenancy (including a person who was joint tenant and later became a sole tenant after the other joint tenant died);
- The deceased tenant had been living alone;
- The deceased tenant had left the property and was not using it as their only home;
- The deceased tenant relinquished the property due to being admitted to hospital or a residential home for long-term care or treatment;
- There had previously been an assignment of the tenancy or property adjustment order under the Family Law Act;
- The person asking for succession is unable to prove their relationship to the deceased tenant, or their period of residence at the address;
- The tenancy has been brought to an end by the Court granting the Council a possession order.

If the tenancy is succeeded by the husband, wife or civil partner of the deceased tenant, they will be allowed to stay in the property on a permanent basis subject to the terms and conditions of the tenancy.

Non-statutory succession

If an occupant has no legal right to succeed to a Council tenancy when the tenant dies, they may still be granted a tenancy by the Council (as a non-statutory succession). This will only be authorised in exceptional circumstances. To qualify for a non-statutory succession, the applicant must:

- (i) have lived with the former tenant at the time of her/his death;
- (ii) have occupied the property as her/his only or principal home for a substantial continuous period prior to the former tenant's death; and
- (iii) be a family member of the former tenant, as defined above.

The Council considers it unlikely that anyone will be entitled to a non-statutory succession unless they have lived in the property as their own or principal home for a continuous period of five years prior to the former tenant's death.

Where, however, the applicant for a non-statutory succession gave up their own accommodation and moved into the property in order to provide care for the former tenant, the Council may accept a shorter period of occupancy. Each case will be considered on its merits, but as a guideline a minimum period of twelve months would be expected.

Succession in relation to specially adapted properties, sheltered housing and under occupation

Due to the shortage of specially adapted accommodation, members of the deceased tenant's household (including partners and those applying for a non-statutory succession) will not be allowed to stay in the property if it has been specially adapted and the successor(s) do not require those adaptations.

In the case of sheltered housing or other properties designated for older people, whilst the husband wife or civil partner will be entitled to succeed, this right will not apply to other potential successors if they are under the age of 60.

If any succession has the effect of creating under occupation, the successor(s) will be encouraged to relocate to a property that meets the bedroom standard (Section 5.5)

Where these circumstances apply, the successor(s) will be required to join the Housing Register to enable the Council to assess their needs, apply an appropriate banding and identify alternative accommodation that is more suited to their requirements. If the applicant does not secure a property within six months, the Council will review their situation and bidding history and may decide to make a 'direct let' to another property. If a suitable offer is made and refused, the Council may decide to withdraw its offer and commence possession proceedings.

8. OTHER PROVISIONS

8.1 Equal Opportunities

The Council is committed to equality of opportunity to promote diversity and combat discrimination on the basis of race, gender, age, religion/belief, disability, sexual orientation or caring responsibilities. The Allocations Policy strives to ensure that each application is treated on its merits and reasonable preference is given to applications according to housing need.

The Allocation Policy (and any subsequent local lettings policies) will be subject to an Equality Analysis.

The Council will monitor the impact of this policy by measuring:

- Applications made to join the Housing Register;
- Lettings made through the Housing Register;
- Length of time on the Housing Register;
- Number of current residents downsizing;
- Number of bids made;
- Refusal decisions;
- Review requests.

The equality characteristics of each element will be recorded and analysed to minimise the risk of discrimination against any group.

8.2 Information about the Allocation Policy

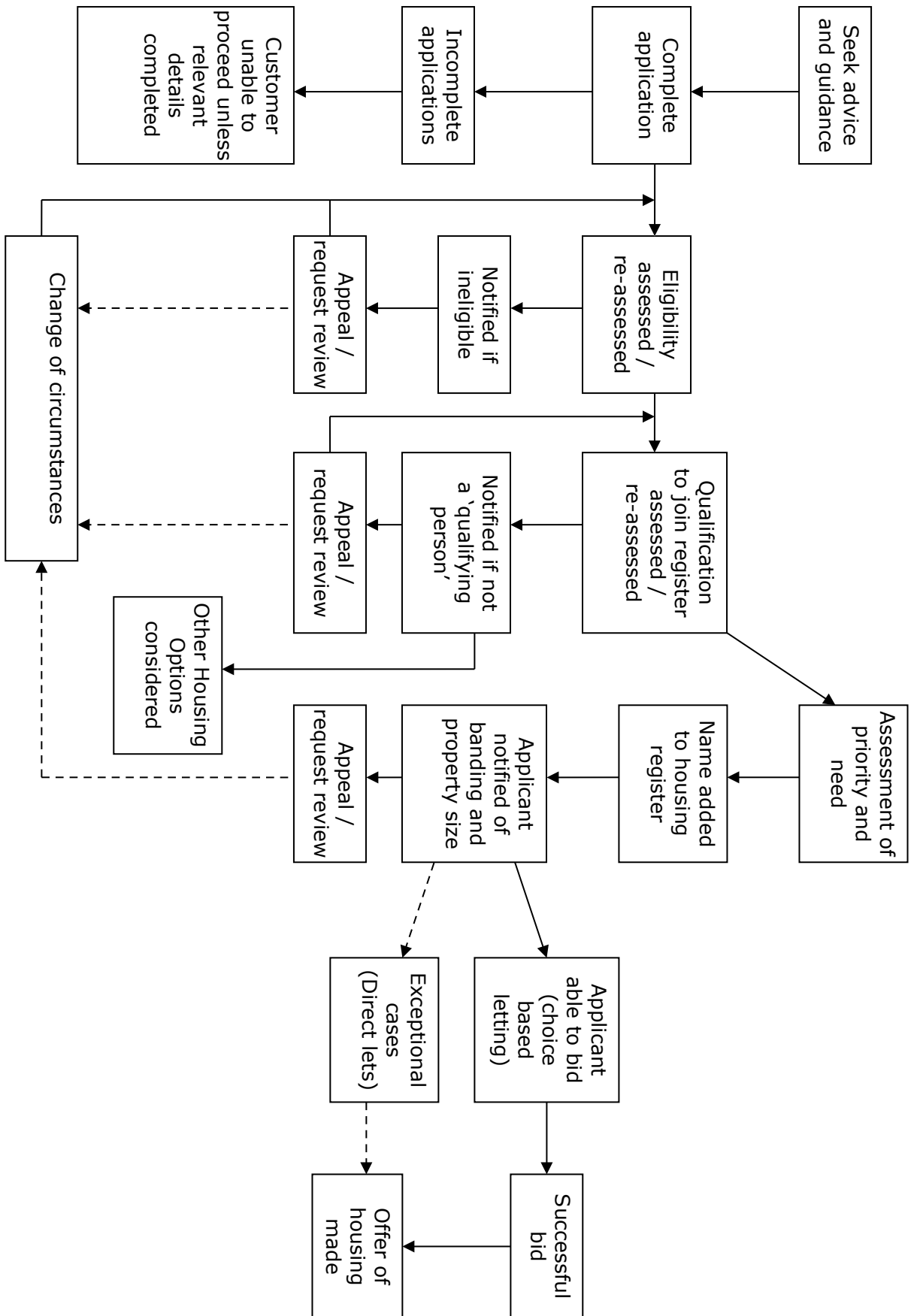
The Council will publish the Allocations Policy and this can be downloaded free of charge from the Council's website.

8.3 Review of Policy

The Allocations Policy will be reviewed annually or earlier if new legislation requires major amendments to be made.

APPLICATION PROCESS

APPENDIX 1



APPENDIX 2**MEDICAL AND WELFARE GROUNDS FOR REASONABLE PREFERENCE**

A mental illness or disorder
A physical or learning disability
Chronic or progressive medical conditions (e.g. MS, HIV/AIDS)
Infirmity due to old age
The need to give or receive care
The need to recover from the effects of violence or threats of violence, or physical, emotional or sexual abuse
Ability to fend for self restricted for other reasons
Young people at risk
People with behavioural difficulties
Need for adapted housing and/or extra facilities, bedroom or bathroom
Need for improved heating (on medical grounds)
Need for sheltered housing (on medical grounds)
Need for ground floor accommodation (on medical grounds)
Need to be near friends/relatives or medical facility on medical grounds
Need to move following hospitalisation or long term care

PRIORITY BANDING

Demand for housing in Bury is high. In order to provide a fair system for allocating social rented properties, the Council prioritises applicants on the Housing Register according to housing needs which is reflected in the banding structure. Within each band all other relevant factors being equal, allocations are made in date order, priority being given to the applicant with the earlier or earliest preference date. To help applicants determine where they may feature in this system, the main factors that apply are set out below for illustration purposes:

Band 1–Urgent Housing Need

Homeless and in priority need
Urgent medical or welfare need
Life threatening circumstances
The Council has accepted a responsibility to re-house
Members of the Armed and Reserve Forces
Exceptional cases

2. Homeless and in priority need – the Council will assess whether an applicant is homeless and in priority need under the homelessness provisions in Part 7 of the Housing Act 1996. Where an applicant is homeless and in priority need, the duty the Council owe her/him depends on whether the individual became homeless intentionally (i.e. deliberately caused their homelessness).
3. If the applicant is unintentionally homeless and in priority need, the Council are under a duty to secure that accommodation becomes available for occupation (s.193(2), 1996 Act); the applicant will remain in Band 1 until permanent accommodation has been found.
4. Urgent medical or welfare need – the applicant (or member of the household) has been assessed, and accepted, as having a critical need to move on medical or welfare grounds. Examples may include instances where hospital discharge is being delayed, chronic progressive medical conditions, families with children being forced to live apart, children in care being prevented from rejoining their family because of inappropriate housing
5. Life threatening circumstances are where there is serious risk of harm from remaining in the present accommodation. This includes but is not limited to:
 - Victims of domestic violence
 - Serious racial harassment
 - Homophobic attacks
 - Victims of crime

In these circumstances, properties will be subject to a direct let, for the safety and sustainability of an applicant's tenancy in the future (see Section 7.1)

6. The Council has accepted a responsibility to re-house – specifically where the Council has been instrumental in requiring residents to move (redevelopment projects, Compulsory Purchase Orders, Closing Orders, etc)

7. Additional preference will be given to the following categories of Armed Forces, in line with statutory guidance, who fall within one or more of the reasonable preference categories and have housing needs:
 - Former members of the Armed Forces
 - Serving members of the Armed Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service
 - Bereaved spouses and civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their spouse or partner
 - Serving or former members of the Reserve Forces who need to move because of a serious injury, medical condition or disability sustained as a result of their service
8. Exceptional cases – the Head of Inclusion may exercise this power, where a household has an exceptional housing need which is not adequately addressed by the Allocations Policy

Band 2 – High Housing Need

Statutory overcrowding
Category 1 hazard under the Housing, Health and Safety Rating System
Leaving supported accommodation
Right to move
High medical or welfare need to move

1. Statutory overcrowding – where current accommodation does not meet current living space or bedroom standards. This will include cases where families with dependent children are non-householders living with family or friends providing the family knows the householder before they moved into the property and are not paying rent
2. Category 1 hazard under the Housing, Health and Safety Rating System – applies where the Council’s Urban Renewal Team (or other Environmental Health Officer) has identified that a household or vulnerable member of that household is at risk from a Category 1 hazard. Examples may include an older person living in a property with inadequate heating, families with young children living with severe dampness, etc
3. Leaving supported accommodation – where the applicant lives in supported accommodation and has been assessed by their Key Worker as ready to move on to independent living. Banding will be backdated to the time the applicant moved into supported accommodation. This banding will be applicable where:
 - The supported housing provider is approved by Supporting People in Bury or the Head of Inclusion.
 - The applicant has a local connection to Bury
 - A Ready to Move (RTM) form has been received from a supported housing provider, to detail how the applicant has developed the necessary independent living skills and is ready to live in their own tenancy.
4. Right to move – applies to applicants who have to relocate to take up employment in the Borough. In these cases, applicants will be required to provide evidence that their claim satisfies the criteria set out in the regulations.

5. High medical or welfare need – medical conditions where evidence has been provided by a qualified professional that a move to more suitable accommodation will improve a **critical** health condition **substantially** to the benefit of the applicant or a member of their household. This will generally relate to people with life limiting conditions, or severe impairments. Where age is also a factor, people over the age of 60 years can apply to be considered for sheltered or extra care housing

Band 3 – Medium Housing Need

Unintentionally homeless but not in priority need
Insecure tenants served with a Notice of Seeking Possession
Households living apart
Medium medical and/or welfare need
Under occupancy
Bedroom Standard overcrowding – 2 bed short

1. Unintentionally homeless but not in priority need – where the Council is satisfied that the applicant is unintentionally homeless but does not have a priority need. This is likely to apply mainly to single people/couples without children and could include people who are confirmed as being rough sleepers who are street living.
2. Insecure tenants of a property in the Borough who are served with a Notice of Seeking Possession through no fault of their own or where possession proceedings are being sought against the landlord
3. Households living apart – this will be awarded if the household is living at separate addresses. A household in this context means people:
 - Who would normally live, or would reasonably be expected to live together
 - Who have not chosen to live apart
 - Who have no rights to occupy any other home
 - Who do not have any other housing needs

This factor does not apply to families with children (see Band 1) who would be treated as having complex needs.

4. Medium medical and/or welfare needs – medical conditions where there is evidence that moving to alternative accommodation will improve a **significant** health and/or welfare condition **substantially** (including mobility or mental health issues) to the benefit of the applicant or a member of their household. This would also apply to older people with some care needs that request sheltered housing
5. Under occupancy – where tenants want to move to a smaller, less costly property. This includes households needing to move because of welfare reform and a requirement to vacate adapted property. Applications may be dealt with through direct lets depending on the urgency and the merits of each case.
6. Bedroom Standard – where the size of the household indicates that two additional bedrooms are required based on the standard allocation of a separate bedroom to each:
 - married or cohabiting couple
 - adult aged 21 years or more

- pair of dependants aged 0-20 years of the same sex
- pair of dependants aged under 10 years regardless of sex. Where the dependants are of the opposite sex they will be assessed as requiring an additional bedroom when the eldest reaches the age of 10
- larger families with 3 or more dependants will be assessed in accordance with the age and sex of the dependants
- The Head of Inclusion may apply discretion in exceptional circumstances

Band 4 – Low Housing Need

Low medical and/or welfare need
Older person living above ground floor level with no lift access
Bedroom Standard overcrowding
Intentionally homeless with a priority need

1. Low medical and/or welfare need – the applicant has a **moderate** need to move to alternative accommodation as determined by the Council’s medical/welfare assessment process.
2. Older person living above ground floor level – applies where one of the household is over 60 year of age) and currently lives in a property above ground floor level which is only accessible by climbing one or more flights of stairs.
3. Bedroom Standard – where the size of the household indicates that an additional bedroom is required based on the standard allocation of a separate bedroom to each:
 - married or cohabiting couple
 - adult aged 21 years or more
 - pair of dependants aged 0-20 years of the same sex
 - pair of dependants aged under 10 years regardless of sex. Where the dependants are of the opposite sex they will be assessed as requiring an additional bedroom when the eldest reaches the age of 10
 - larger families with 3 or more dependants will be assessed in accordance with the age and sex of the dependants
 - The Head of Inclusion may apply discretion in exceptional circumstances
4. Intentionally homeless in priority need – where an applicant has been assessed as being in priority need under the provisions of Part 7 of the Housing Act 1996 but has made themselves intentionally homeless

Band 5 – Assessment of Need

Awaiting a decision on a homelessness application
No local connection
Unreasonable refusal of a suitable offer
Not ready to move on from supported accommodation
Applications for retirement living or extra care
Sanction for inappropriate behaviour
Non priority intentional homeless

1. No local connection – the applicant may have some or low housing needs but does not satisfy the local connection criteria (Section 5.3)

2. Unreasonable refusal – where suitable offers have been made but is turned down by the applicant and the offer has been withdrawn (Section 6.3, Section 7.1)
3. Not ready to move on from supported accommodation – an applicant who is living in supported accommodation but is not ready to move into their own tenancy, will be placed in this band until it has been ascertained if the applicant has developed the necessary independent living skills.
4. Retirement living – refers to property specifically designed to assist older people with mobility or other support needs. The acceptance of transfer applications from tenants already in a property designated for retirement living will be at the discretion of the Head of Inclusion based on the merits of each case
5. Non-priority intentional homeless – this banding recognises that the applicant is homeless but is not in priority need for housing

APPEALS, REVIEWS AND COMPLAINTS

Appeals / Review process

Anybody can apply to go on the Council's Housing Register but not everybody is eligible and those that are will be given priority according to assessed need and the rules of the Allocations Policy.

When decisions are made about your application, we will notify you of the outcome and explain the reasons why. If you feel the policy has not been applied correctly or relevant information has been missed, you may request a formal review.

When can I request a review?

You, or an advocate acting on your behalf with your express permission, may request a review if the Council:

- Refuses your application to join the Housing Register or considers you not to be a "qualifying person" (Section 3.3).
- Cancels your housing application and removes you from the Housing Register (Section 4.3).
- Suspends you from the Housing Register or reduces your banding (Section 4.4).
- Disagrees with your assessment of medical need (Section 5.2)
- Allocates a banding that is inappropriate to your level of need (Section 5.4).
- Offers you a property that you consider to be unacceptable (Sections 5.5. 7.1).
- Restricts you from bidding for properties (Section 6.5).
- Reduces your banding following refusal of an offer (Section 7.1).

How do I request a review?

You must do this within 21 days of the Council informing you of its decision.

All appeals must be in writing to:

**Head of Inclusion
Bury Council
Town Hall
Knowsley Street
Bury
BL9 0SW**

It is important that you tell us:

- (a) Why the Council should review its original decision
- (b) What outcome you want from the review
- (c) Any new information you want us to consider

Offences related to information given or withheld by applicants

It is an offence for anyone, in connection with the exercise by a housing authority of its functions to:

- Knowingly or recklessly give false information
- Knowingly withhold information which the housing authority has reasonably required the applicant to give in connection with the exercise of those functions

The circumstances in which an offence is committed could include providing false information:

- On an application form for social housing
- In response to a request for further information in support of the application
- During review proceedings

What happens next?

A manager who was not involved in the original decision will carry out a formal review. They will look again at the information supplied and discuss the issues with the person who made the original decision to understand why that conclusion had been reached.

The person conducting the review may also want to talk to you directly to verify statements or seek additional information. Your cooperation would be appreciated to ensure a speedy resolution of the review.


We will inform of the outcome within 8 weeks of you requesting the review. We will also tell you the reason(s) for that decision.

If you are unhappy about the way the review was handled, this will be handled through the Council's formal complaints process. Details on how to do this are available on the website or from Council offices.

Equality Analysis Form

The following questions will document the effect of your service or proposed policy, procedure, working practice, strategy or decision (hereafter referred to as 'policy') on equality, and demonstrate that you have paid due regard to the Public Sector Equality Duty.

1. RESPONSIBILITY

Department	Communities and Wellbeing	
Service	Inclusion	
Proposed policy	Allocations Policy	
Date	14.08.2015	
Officer responsible for the 'policy' and for completing the equality analysis	Name	Harry Downie
	Post Title	Assistant Director
	Contact Number	0161 253 7570
	Signature	
	Date	14.08.2015
Equality officer consulted	Name	Helen Smith
	Post Title	Public Health and Social Care Intelligence Manager
	Contact Number	0161 253 6338
	Signature	 73/2015
	Date	14.08.2015

2. AIMS

What is the purpose of the policy/service and what is it intended to achieve?	<p>The Council is required, under Section 167 of the Housing Act 1996, to have an Allocations Policy for determining the priorities and procedure to be followed in allocating its housing accommodation.</p> <p>The policy was last updated and approved by Cabinet in March 2013 but since then there have been changes in legislation, case law and operational matters which require the policy to be updated.</p> <p>The 2015 version of the policy incorporates those changes and clarifies the Council's position regarding:</p> <ul style="list-style-type: none"> • Right to move for work; • Procurement of properties for homeless households; • Applications for retirement living from existing tenants; • Bidding processes including removing the limits to the
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	<p>number of bids eligible and qualifying persons can make each week;</p> <ul style="list-style-type: none"> • Suspension and removal from the housing register; • Occupation of adapted properties; • Bedroom occupancy and the impact of other welfare reforms
Who are the main stakeholders?	<p>Present and future households applicants for Council housing Potentially any member of the public Housing Assessment Service Other Council departments Six Town Housing and registered housing providers Government departments Courts Community and Voluntary Organisations</p>

3. ESTABLISHING RELEVANCE TO EQUALITY

3a. Using the drop down lists below, please advise whether the policy/service has either a positive or negative effect on any groups of people with protected equality characteristics. If you answer yes to any question, please also explain why and how that group of people will be affected.

Protected equality characteristic	Positive effect (Yes/No)	Negative effect (Yes/No)	Explanation
Race	No	No	The policy applies existing legislative bans on persons who are subject to immigration controls (or who do not satisfy resident requirements) but does not extend beyond this. The policy may indirectly benefit some ethnic groups with larger families by addressing under occupancy of larger family houses.
Disability	Yes	No	The Allocations Policy has a positive impact on disability: <ul style="list-style-type: none"> • Allowing for the direct letting of adapted properties to make best use of this scarce resource and speed up the allocation process. • Authorising the rehousing of tenants of adapted properties who are no longer in need - to free up that house for a disabled applicant. • Giving the highest banding where the relocation of people is required to safeguard an individual or protect somebody who has been subject to harassment or a hate

			crime.
Gender	Yes	No	The policy is largely gender neutral but does allow for the direct letting of property to protect individuals. This includes domestic violence and abuse where over 80% of victims are women.
Gender reassignment	No	No	Neutral Impact.
Age	Yes	No	The policy make special provision for the allocation of retirement living schemes, extra care and properties built specifically for older people.
Sexual orientation	No	No	Neutral Impact
Religion or belief	No	No	Neutral Impact
Caring responsibilities	Yes	No	This policy will have a positive impact as the assessment of property size and banding criteria recognises the needs of dependants and live in carers.
Pregnancy or maternity	Yes	No	This policy will have a positive impact as the assessment of property size and banding criteria will take into account family commitments and/or proof of pregnancy.
Marriage or civil partnership	No	No	Neutral Impact

3b. Using the drop down lists below, please advise whether or not our policy/service has relevance to the Public Sector Equality Duty. If you answer yes to any question, please explain why.

General Public Sector Equality Duties	Relevance (Yes/No)	Reason for the relevance
Need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Yes	The policy is based on giving reasonable preference to people in housing needs and this is reflected in the banding structure. It addresses incidents of discrimination - in allowing properties to be directly let to people who are subjected to harassment, violence or hate crime and specifies sanctions against tenants or applicants who engage in unacceptable or anti-social behaviour.
Need to advance equality of opportunity between people who share a	Yes	The policy recognises the needs of disabled, homeless and vulnerable people (such as victims of domestic

protected characteristic and those who do not (eg. by removing or minimising disadvantages or meeting needs)		violence). These needs are assessed through operational practice which, coupled with reasonable adjustments such as direct letting to disabled applicants, are in place to minimise disadvantage and increase life chances.
Need to foster good relations between people who share a protected characteristic and those who do not (eg. by tackling prejudice or promoting understanding)	Yes	The criteria for determining who qualified for a Council house was well received when introduced in 2013 and this approach is set to continue. By focusing on housing need, and recognising the specific requirements of older and disabled applicants within that framework, the policy is building a consensus around letting priorities based on a better understanding of how the system works.

If you answered 'YES' to any of the questions in 3a and 3b

Go straight to Question 4

If you answered 'NO' to all of the questions in 3a and 3b

Go to Question 3c and do not answer questions 4-6

3c. If you have answered 'No' to all the questions in 3a and 3b please explain why you feel that your policy/service has no relevance to equality.

4. EQUALITY INFORMATION AND ENGAGEMENT

4a. For a service plan, please list what equality information you currently have available, **OR** for a new/changed policy or practice please list what equality information you considered and engagement you have carried out in relation to it.

Please provide a link if the information is published on the web and advise when it was last updated?

(NB. Equality information can be both qualitative and quantitative. It includes knowledge of service users, satisfaction rates, compliments and complaints, the results of surveys or other engagement activities and should be broken down by equality characteristics where relevant.)

Details of the equality information or engagement	Internet link if published	Date last updated
Government legislation and guidance		
Supreme Court judgements		
Housing waiting list data		
Service monitoring data		

4b. Are there any information gaps, and if so how do you plan to tackle them?

[The Service intends to consult with the community and other providers to seek their views on the policy changes.](#)

5. CONCLUSIONS OF THE EQUALITY ANALYSIS

What will the likely overall effect of your policy/service plan be on equality?	The policy will have a positive impact in maintaining a consistent and transparent approach to letting Council housing. In particular it updates policy on allocating adapted properties, tackling unacceptable behaviour and retirement living. The wider role of housing in meeting basic needs, minimising disadvantage and tackling discrimination is understood
If you identified any negative effects (see questions 3a) or discrimination what measures have you put in place to remove or mitigate them?	<p>The policy introduces stronger sanctions against tenants or applicants that engage in unacceptable or anti social behaviour. Whilst having a negative impact on those individuals, this approach is a positive step for victims and the community at large.</p> <p>The policy also has to apply nationally prescribed eligibility criteria and determine who will qualify for housing. As a result, certain groups will not be able to join the housing register.</p>
Have you identified any further ways that you can advance equality of opportunity and/or foster good relations? If so, please give details.	Information from the housing waiting list will provide registered housing providers and builders intelligence on housing need in the Borough. The Council will promote this data to influence the type and size of properties that are commissioned under the Affordable Homes Programme.

What steps do you intend to take now in respect of the implementation of your policy/service plan?	The policy will be subject to consultation with the community, providers and other interested parties prior to submission to the Cabinet for approval.
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6. MONITORING AND REVIEW

If you intend to proceed with your policy/service plan, please detail what monitoring arrangements (if appropriate) you will put in place to monitor the ongoing effects. Please also state when the policy/service plan will be reviewed.

The policy will be measured through its impact on the housing waiting list, the lettings process and customer feedback.

The policy will be kept under regular review to facilitate the smooth running of the allocations process, respond to any changes in legislation, case law or operational practice and address any other concerns that may be identified by customers or housing providers.

COPIES OF THIS EQUALITY ANALYSIS FORM SHOULD BE ATTACHED TO ANY REPORTS/SERVICE PLANS AND ALSO SENT TO THE EQUALITY INBOX (equality@bury.gov.uk) FOR PUBLICATION.

REPORT FOR DECISION



DECISION OF:	CABINET
DATE:	4 NOVEMBER 2015
SUBJECT:	HOMELESSNESS STRATEGY 2015-18
REPORT FROM:	COUNCILLOR RISHI SHORI DEPUTY LEADER AND CABINET MEMBER FOR FINANCE AND HOUSING
CONTACT OFFICER:	Harry Downie, Assistant Director
TYPE OF DECISION:	CABINET (KEY DECISION)
FREEDOM OF INFORMATION/STATUS:	This paper is within the public domain.
SUMMARY:	<p>The Council has a statutory duty to produce a homeless strategy. The attached draft replaces the existing strategy and sets out a direction of travel for the next 3 years.</p> <p>Whilst pressures in the system are expected to persist due to the housing market situation, welfare reform and relationship breakdowns, the strategy seeks to manage these uncertainties and provide hope to people who find themselves without accommodation.</p> <p>Building on a better appreciation of people's needs and a focus on prevention, the desired outcome is to help as many people as possible to remain independent and avoid having to go down the homeless route. As well as being better for their well being, it will also allow available resources to be dedicated to delivering a quality service to those families and individuals that do require additional support to help them move on.</p>
OPTIONS & RECOMMENDED OPTION	<ol style="list-style-type: none"> 1. To approve the strategy. This is the recommended option. It provides a clear direction of travel and sets priorities for the service going forward that are consistent with the Council's wider ambitions. 2. To not approve the strategy.
IMPLICATIONS:	
Corporate Aims/Policy Framework:	Do the proposals accord with the Policy Framework? Yes
Statement by the S151 Officer: Financial Implications and Risk Considerations:	The strategy has no direct financial implications on the service but provides guidance to managers and commissioners in

SK

	<p>respect of prioritising the use of resources.</p> <p>The Strategy helps to mitigate the risk (and cost) of having to provide temporary accommodation for homeless people.</p>	
Health and Safety	There are no health and safety issues arising directly from this strategy. Service delivery and operational decision making are subject to risk assessments which are implemented in line with existing policy.	
Statement by Executive Director of Resources:	This is a key strategy for the Council, supporting the delivery of the overall Housing Strategy	SK
Equality/Diversity implications:	The Equality Analysis indicates that the proposals are positive particularly for younger single people, disabled applicants and families (with caring responsibilities). The use of dispersed properties and sensitive lettings is also seen to support community cohesion although the extent to which these can be delivered will be influenced by legislation, case law and the availability of resources.	
Considered by Monitoring Officer:	<p>Yes</p> <p>In preparing this strategy the Council has, in accordance with s 7(A) of the Homelessness Act 2002, had regard to its current Housing Allocations Scheme under s 166A of the Housing Act 1996 and its Strategic Tenancy Policy under s 150 of the Localism Act 2011.</p> <p>This strategy will be kept under review to ensure it is up to date with key changes in legislation, government guidance, corporate priorities and local and national trends and issues.</p>	JH
Wards Affected:	All	
Scrutiny Interest:	Overview and Scrutiny	

TRACKING/PROCESS

DIRECTOR: Executive Director of Communities and Well Being

Chief Executive/ Strategic Leadership Team	Cabinet Member/Chair	Ward Members	Partners
28.9.15			
Scrutiny Committee	Committee	Council	
	4 November 2015		

1. INTRODUCTION

- 1.1 The Homelessness Act 2002 requires all local authorities to produce strategies, keep homelessness (and the factors that influence homelessness) under review and take appropriate action. With the previous strategy having come to an end, the time is now right to review progress and set a clear direction of travel for the coming years.
- 1.2 With housing market conditions remaining difficult, further public service funding cuts on the way and welfare reform changes continuing, pressures in the system are expected to persist. This new Strategy will help maintain the focus on homelessness and ensure available resources are targeted to best effect within the legislative and national policy framework.
- 1.3 Our aspiration remains to end homelessness. Whilst many may see as unattainable, it is the level of ambition required to tackle the underlying causes of homelessness, increase preventative action and drive quality services.

2. WHERE ARE WE NOW?

- 2.1 Each year, hundreds of households present themselves to the Council as homeless. The circumstances behind every case are unique although most instances can still be grouped under one of three main causes:
 - Arrangements with family or friends coming to an end
 - Relationship breakdowns (the majority of which involve violence)
 - Financial problems (generally resulting in arrears, eviction, etc)
- 2.2 Although homelessness only affects 1% of the local population each year, the impact on those individuals can be devastating – and costly to society. The previous strategy improved Bury’s response. It prompted a greater emphasis on prevention, eliminated the use of bed and breakfast accommodation and replaced South View hostel with a portfolio of self contained properties which enable people to maintain their independence and achieve a ‘normalised’ state of living at a time of great uncertainty.
- 2.3 However continued innovation is essential to keep ahead of demand. Traditional causes of homelessness have not gone away and the current state of the housing market, welfare reform changes and changes in case law which relaxed the eligibility criteria are adding to the pressure in the system. Younger single people who find their benefits capped together with people with disabilities are particularly affected by these changes.
- 2.4 There is also work to be done in other areas. Rough sleeping (particularly those ‘sofa surfers’ and other people who are not living on the streets) remains a largely unknown quantity. Support to complex individuals needs to be reviewed to ensure that access to information and support is effective and commissioning practice rationalised to deliver better value for money. In short, earlier interventions using approaches that meet individual need are required to offer quicker, more convenient housing options.

3. PROPOSALS

- 3.1 To address the factors influencing the future, the strategy is based on five priorities:
 - **Understanding needs.** Listening to individual experiences to improve services and develop new ways of working. Whilst formal assessments have their place, we need to have more of a conversation with individuals to understand what is happening in their lives, change behaviours and break the cycle of homelessness which is costly to statutory agencies.

- **Focus on prevention.** Avoiding more people having to go down the statutory homelessness route by seeking to increase the supply of affordable housing (in the public and private sector) as well as developing innovative solutions to meet specific needs.
- **Good quality.** Giving a quality experience from first point of contact until people leave the service and regain their independence.
- **Strong leadership and management.** There are challenges ahead which will require the balancing of quality, cost and diversity in order to maintain provision which is valued and fully utilised by local people.
- **Sustainable communities.** Supporting the development of stronger, safer communities by encouraging homeless households and vulnerable people (such as rough sleepers) to engage and integrate with local communities. This priority is also about keeping homeless people within their local areas where possible to maintain family networks, avoid disruption to schooling, minimise isolation, etc.

4. FINANCIAL IMPLICATIONS

- 4.1 The strategy has no direct financial implications on the service but provides guidance to managers and commissioners in respect of prioritising the use of resources.
- 4.2 It is known that Government funding will fall in the coming years. Options for dealing with this scenario are being evaluated to ensure that resources are being targeted to greatest effect. This includes identifying external funding opportunities, improved cross-agency working and maximising the collection of income (rent, service charges, etc) payable by households.
- 4.3 Although homelessness is a statutory function with many prescribed steps, efforts will be made to cut the cost of administration. Legislation specifically prohibits the Council from shifting the burden of information gathering onto homeless applicants but this does not stop the Council from keeping processes and procedures under review to increase efficiency, reduce duplication and speed up decision making whilst managing risks and safeguarding vulnerable people.

5. RISKS

- 5.1 The primary risk to the service relates to funding – and the cost of temporary accommodation for a growing number of applicants. This risk is mitigated by increasing the number of households prevented from becoming homeless. The strategy has focused on these components to reduce the impact of demand on statutory services and keep costs under control.
- 5.2 Breaking the cycle of homelessness requires better engagement with applicants – to understand their specific circumstances and provide support that will help them to live independently. Building on schemes that link the offer of property to tenant commitments to look for work, develop skills, etc, have been shown to increase the resilience of individuals and reduce the risk of repeat homelessness. Better tracking of households will provide further reassurance on the quality and value of this provision.
- 5.3 Not implementing the strategy also carries major risks. It is a statutory requirement and the lack of a strategy could lead to the Council being challenged. Perhaps more importantly, without a focus, the functions risks being driven by funding decisions rather than policy – an approach that will lead to lower quality and service decline at a time when it needs to be identifying ways to improve the resilience and life

chances of individuals as a means of reducing inequalities and tackling a serious social issue.

6. EQUALITY AND DIVERSITY ISSUES

- 6.1 The Equality Analysis indicates that the overall effect of the strategy will be positive.
- 6.2 By using evidence to address the factors which cause homelessness, the strategy will improve services to younger single homeless, strengthen responses to victims of domestic violence (who are mainly female) and people with disabilities who present as homeless.
- 6.3 From a community cohesion perspective, utilising mainstream properties (rather than placement in hostels or bed and breakfast accommodation) enables homeless households to remain their locality close to family, friends and amenities. It also allows people a 'normalised' way of living which is beneficial when the time comes to move on.

7. CONCLUSIONS AND RECOMMENDATIONS

- 7.1 Homelessness provision in Bury has taken significant steps forward in recent years. By focusing on needs, improving the range and quality of provision and streamlining processes to drive efficiency, the service is making a difference to people's lives.
- 7.2 Responsibility for reducing disadvantage is well understood. This has shifted the emphasis from simply meeting statutory requirements to building the resilience of individuals and preparing them for independent living. Encouraging households to take ownership of their situation and accountability for the outcome is central to this approach.
- 7.3 The future strategy builds on this by reinforcing areas of strength, using evidence to highlight areas for improvement and clarifying the future direction of travel. This is expressed through five key priorities:
 - Understanding needs
 - Focusing on prevention
 - Good quality
 - Strong leadership and management
 - Building an effective and sustainable approach to provision
- 7.4 Accordingly it is recommended that the strategy is approved.

List of Background Papers:-

Homelessness Strategy 2015-18
Equality Analysis

Contact Details:-

Harry Downie, Assistant Director

Tel: 0161 253 7570

Email: h.downie@bury.gov.uk

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BURY HOMELESSNESS STRATEGY
2015-18

Opening Doors, Building Lives

Foreword

Housing is a basic need. Having your own place provides security, a sense of belonging and access to services, employment and other amenities. However, too many of our residents find it hard to obtain and then keep a property. Statistically the numbers are low. Only 1% of the local population is affected each year but this says nothing about the devastating effect that losing a home has on families, the economy and the public purse.

And the situation is deteriorating. A lack of affordable housing, financial worries and relationship breakdowns are creating gaps in society and some individuals risk being left behind. It is against this background that we look to this Strategy to provide some hope. We cannot change the economy or solve the housing crisis but we can support individuals to be more resilient to the changes happening around them. With this in mind, our five key priorities are:

1. Understanding needs
2. Focusing on prevention
3. Good quality
4. Strong leadership and management
5. Building an effective and sustainable approach to provision

Delivering improvement is a challenge at a time of shrinking resources. But we start from a strong base. Bury does not use bed and breakfast accommodation, we prevent two cases of homelessness for every one we take on and strong partnerships have supported thousands of people into accommodation over the years. These successes are not an excuse for complacency. We need to explore what more we can do to stop people going through the tragedy that is homelessness – and minimise the impact on those that do.



Cllr Rishi Shori
Bury Council, Cabinet
Member for Housing
and Finance

Basing our priorities on evidence, self assessment and the views of customers enables us to target activity for maximum return. However, not everything is quantifiable. It is difficult to put a price on the increased confidence, reassurance and sense of well being that our support brings to people suffering homelessness through no fault of their own. The fact that Bury not only delivers its statutory duties but actively works to prevent homelessness despite the severity of budget cuts makes me proud.

Maintaining this approach will take us in the right direction, make best use of resources and promote the dignity of families and individuals who are going through a tough time. Helping residents to build, or regain, an ordinary life is one of the things we need to continue doing. Bury is a great place to live and I want to keep it that way.

I believe this Strategy supports that level of ambition. It sets out clearly where we want to be and provides an excellent guide to how we get there.

Introduction and context

Homelessness is a national issue that affects hundreds of households in Bury each year. The Council has a statutory duty to identify people who are homeless, investigate their claims and provide services to people in housing need. We do this through:

- Face to face conversations with people presenting as homeless
- Formal assessments conducted in line with legislative, statutory guidance and case law requirements
- Information, support and advice on housing options
- Providing temporary accommodation in emergencies (and helping those households to find permanent homes)
- Monitoring homelessness using demographic trends, rough sleeper/street needs audits, etc to predict demand and manage risks
- Commissioning new projects and services to meet changing needs

46% of homeless cases are due to arrangements with family or friends coming to an end. Relationship breakdowns account for a further 21% of cases (two thirds of these involving violence) with financial problems at the centre of the problem in 13% of cases. The level of disruption this causes cannot be underestimated. Apart from affecting people's confidence and often their health, homelessness damages the economy. Homeless people have less income and often make extra demands on public services.

The statistics however challenge several common preconceptions of homelessness. Although 40% of decisions relate to people under 30 (some of whom have been caught by changes in welfare reform), over half of homeless cases fall into the 30-49 age range; the gender split is broadly even; and only 45% of homeless households have one or more children. Although national policy and legislation favours families and vulnerable adults, it is clear that anyone can become a victim of homelessness. Given this position, it is difficult to adopt a 'one size fits all' approach. People's needs are different. This is reflected in the legislation and statutory guidance where, despite the highly prescribed nature of the process, room for discretion still exists. Achieving the right balance between consistency of practice, meeting individual needs and recognising the interests of the wider community will be fundamental to improving outcomes for local people.

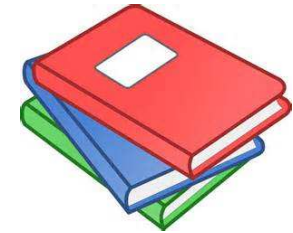
The legislation also recognises the need to look beyond the statutory process. Emphasis is placed on prevention – tackling housing issues at a early stage to divert more people away from high cost, statutory interventions. Understanding the issues, offering advice and information and finding solutions to help people gain or retain settled accommodation will enable homeless people with lower level needs to be supported before they become priority cases.

Understanding needs

Acquiring a better appreciation of the issues to improve services to homeless people.

Following the story

Statistics only tell you so much. Listening to individuals' experiences of homelessness says a lot more about the process and what matters to people. Based on feedback, we have changed services. For example, a former hostel has been replaced by community based properties that help people feel part of the community; a project for single homeless is now successfully providing training and support to help people into work; and the 'front door' to the service has been redesigned to make it easier to access information and advice. We need to continue listening and developing services in response to needs – rather than just seeing homelessness as a process to follow.



Breaking cycles of homelessness

Around 3% of cases come back through the system within two years. Accordingly, whilst the vast majority of households are successful in moving on, it is clear that in a small number of cases the original efforts to resolve the situation didn't work. Further research is required to determine why this is happening. Evidence from rough sleepers shows that some of the most entrenched homeless persons have been able to sustain settled accommodation so there maybe other factors influencing repeat cases that services should be taking into account.

Making every contact count

Homelessness seldom comes alone. Many homeless households also struggle with unemployment, debt and poor health putting additional strains on relationships and day to day living. Tackling this level of complexity is beyond individual agencies. We must work together if we are to make a real difference to people's lives.

Communication



We will:

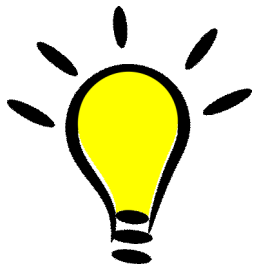
- Expand provision and opportunities for younger people and the single homeless.
- Rigorously assess performance and measure the impact of interventions to inform future service design.
- Reduce the number of repeat homeless cases.
- Work with partners to address the underlying causes of homelessness and identify those households at risk.

Focus on prevention

Getting in early to minimise problems and reduce demand on services.

Matching supply and demand

There is a fundamental issue of housing supply – the Borough has too few houses at prices most people can afford. Despite our success in bringing empty properties back into use and attracting investment to support our Affordable Housing Programme, more work is needed if we are to extend housing options to local people. Rising costs mean more younger (and elderly) relatives are having to live with their families which can lead to increased tensions.

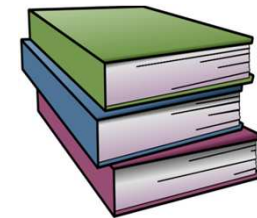


Knowing what works

Homelessness is costly. Apart from creating personal tragedies, independent research suggests that each case costs local authorities over £9,000 to process. Prevention therefore makes sense. We are heading in the right direction as over 900 cases were prevented in 2014/15. Maintaining this level of activity and developing viable alternatives to homelessness will be critical to success in terms of sustaining families and reducing demand on services.

Making proper enquiries

Decision making has improved significantly in recent years as information gathering and assessment has become more systematic and comprehensive. Although case law allows room for discretion and interpretation, only 2% of decisions are overturned on appeal. Our next step is to track the impact of our decisions on individual life chances and use this intelligence to raise standards, improve outcomes and target resources to maximum effect.



We will:

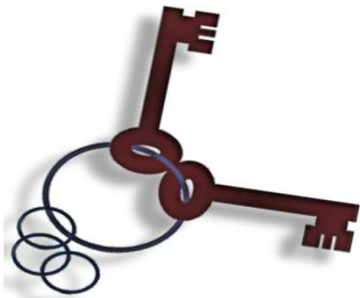
- Work to grow the housing market and increase housing opportunities for local people.
- Utilise 'Preventing Homelessness' funding from Government to develop innovative projects that avoid people becoming homeless – and get them back on track quickly when they do.
- Support corporate activity on welfare reform so that benefit changes do not become a source of homelessness.
- Provide information and advice to individuals and families which enable them to take ownership of their situation and manage expectations around housing options.

Good quality

Services are accessible, valued and efficient in improving outcomes for homeless people.

High standards

Reported outcomes, feedback and self assessment indicate that the service is good and meeting its objectives. Building on a track record of self awareness, the service has a culture of continuous improvement and this approach will continue as we look for more effective and efficient ways to implement our statutory duties. Maintaining standards however takes sustained effort; the service must respond to the needs of individuals, Government guidance and current thinking as outlined in case law. To achieve this we will continue to benchmark performance, develop the workforce and implement innovative projects to meet the needs of homeless people.



Quality of services

Homelessness is all about people. Everybody is entitled to be treated with dignity and respect. This means not using bed and breakfast accommodation; ensuring all homeless people (especially rough sleepers) have access to health screening and medical facilities; and agreeing any support packages with the individuals concerned based around individual/family outcomes. The private and voluntary sector have a key role to play in developing products that meet the needs of homeless people and we will work with all providers to ensure that these are suitable, of sufficient standard and are geared to helping homeless people move on with their lives.

We will:

- Deliver our statutory duties.
- Continue to work with partners to monitor and refresh procedures to ensure people are safeguarded.
- Not place any homeless person in bed and breakfast accommodation.
- Keep all provision under review to ensure that it is meeting needs and making a real difference to people's lives.
- Support households to attain an ordinary life again, reducing the time spent in temporary accommodation.
- Work with landlords to get more properties meeting quality thresholds, at a rent that most people can afford.
- Invest in training to ensure the necessary skills and standards are evident and applied in all aspects of the service.

Strong leadership and management

Achieving outcomes in line with the Council's policy objectives – at reduced cost.

Making Bury a great place to live, work, study, and visit

It has always been a feature of Inclusion Services that national guidance and local ambitions are embedded into service priorities. This is still the case. Homelessness is frequently linked to other household circumstances and by addressing housing needs, the pathway to employment, training and personal development becomes easier.

This strategy therefore includes actions that not only improves the way we handle presenting needs but also looks to wider economic and social well being issues. We will encourage people to take ownership of their situation and where necessary work with them to change behaviours to avoid homelessness in the future.



Resources

With Council resources reducing during the period of this strategy, we will seek to cut costs and attract new income to fund services. Whilst valuing the Council contribution, diversifying income sources is necessary to protect services, fund innovation and change behaviours. Simple things such as households paying for accommodation reduces Council expenditure and also gets people used to budgeting as they prepare to regain their independence.

We will:

- Actively contribute to national and local priorities.
- View homelessness in the context of the household's wider economic and social well being.
- Strengthen and diversify provision to develop a strong independence culture in the Borough.
- Maximise the resources available to improve outcomes for local people.
- Recover accommodation costs from individuals at a level that reflects the cost of provision without being an undue deterrent or creating financial hardship.

Sustainable communities

Creating an environment where people are well informed, empowered and confident in their own abilities.

Bringing people along

Confidence is an issue for many homeless people – some of whom have had difficult experiences in the past. We will make it as easy as possible for individuals to understand the housing options open to them, access the information, advice and guidance relevant to their situation and offer further support where needed to help them achieve ordinary lives. Aspirations are important. The function is all about moving people on so that they reach their potential, live independently and integrate well within the community.



Reducing inequalities

Whilst proud of what the Borough has achieved, we are aware of geographical differences and other inequalities that exist. More effort is required to resolve these issues and minimise the risk of some people being left behind. In particular we need to divert households away from chaotic lifestyles, increase housing options for all and work with partners to improve our offer to those furthest away from the housing market.

House prices, living patterns and other factors such as technological developments are changing traditional ways of living. Our services need to adapt to this environment and ensure that issues such as welfare reform, access to quality housing and social isolation do not add to the pressures of modern living.


We will:

- Identify and develop community assets and local networks to support individuals in their time of need.
- Tailor support to the needs of vulnerable groups (rough sleepers, younger people, domestic violence victims).
- Make provision for rough sleepers during cold weather
- Promote the integration of homeless people into society by discouraging arrangements which label or stigmatise individuals and damage community cohesion.
- Help harder to engage groups (rough sleepers, refugees, care leavers) into housing and employment.

Equality Analysis Form

The following questions will document the effect of your service or proposed policy, procedure, working practice, strategy or decision (hereafter referred to as 'policy') on equality, and demonstrate that you have paid due regard to the Public Sector Equality Duty.

1. RESPONSIBILITY

Department	Communities and Wellbeing	
Service	Inclusion	
Proposed policy	Homelessness Strategy	
Date	13.08.2015	
Officer responsible for the 'policy' and for completing the equality analysis	Name	Harry Downie
	Post Title	Assistant Director
	Contact Number	0161 253 7570
	Signature	
	Date	13.08.2015
Equality officer consulted	Name	Helen Smith
	Post Title	Public Health and Social Care Intelligence Manager
	Contact Number	0161 253 6338
	Signature	 72/2015
	Date	14.08.2015

2. AIMS

What is the purpose of the policy/service and what is it intended to achieve?	<p>The strategy is a statutory requirement that provides a clear focus for in-house services, develops a direction of travel towards our ambitions and helps to influence commissioning behaviour.</p> <p>There is a strong focus on prevention – actions that will increase our understanding of homelessness and develop housing options. The need to avoid sub-standard or inadequate accommodation such as bed and breakfast is recognised as a positive means of helping people to move on as quickly as possible. This is built into the strategies 5 key priorities :</p> <ul style="list-style-type: none"> - Understanding needs - Focusing on prevention - Good quality - Strong leadership and management
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	- Building an effective and sustainable approach to provision
Who are the main stakeholders?	Present and future households presenting as homeless Potentially any member of the public Housing Assessment Service Other Council departments Public and statutory agencies Government departments Community and Voluntary Organisations Funding bodies

3. ESTABLISHING RELEVANCE TO EQUALITY

3a. Using the drop down lists below, please advise whether the policy/service has either a positive or negative effect on any groups of people with protected equality characteristics. If you answer yes to any question, please also explain why and how that group of people will be affected.

Protected equality characteristic	Positive effect (Yes/No)	Negative effect (Yes/No)	Explanation
Race	No	No	The strategy focuses on need rather than protected characteristics.
Disability	Yes	No	Coupled with the Allocations Policy, the strategy has a positive impact on disability as there is provision for disabled people to be matched to adapted properties. This makes best use of a scarce resource and speeds up the allocation process. Changes in case law which have reduced the threshold will also be reflected in operational practice.
Gender	Yes	No	Statistics show that the gender split on homelessness is broadly even but we also know that relationship breakdown (often including violence) is a major cause of homeless presentations, with women being disproportionately represented. This strategy will work in tandem with the Domestic Violence and Abuse Strategy to protect victims - whether they choose to move or stay put.
Gender reassignment	No	No	Neutral Impact.
Age	Yes	No	The strategy will have a positive affect on younger, single homeless. 40% of

			decisions relate to people under 30 - which includes care leavers and those individuals hit by changes in benefit rules. With legislation favouring families with children, projects such as HEN, other schemes funded by SP grants and promoting suitable private sector properties provide accommodation and opportunities to meet the needs of this cohort that would not otherwise be available.
Sexual orientation	No	No	Neutral Impact
Religion or belief	No	No	Neutral Impact
Caring responsibilities	Yes	No	This strategy is positive for families as its actions are aimed at avoiding the use of bed and breakfast and hostel living (which can uncrease feelings of vulnerability).
Pregnancy or maternity	Yes	No	This strategy is positive for families as its actions are aimed at avoiding the use of bed and breakfast and hostel living (which can uncrease feelings of vulnerability).
Marriage or civil partnership	No	No	Neutral Impact

3b. Using the drop down lists below, please advise whether or not our policy/service has relevance to the Public Sector Equality Duty. If you answer yes to any question, please explain why.

General Public Sector Equality Duties	Relevance (Yes/No)	Reason for the relevance
Need to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010	Yes	By seeking to integrate homeless households sensitively within neighbourhoods, the strategy aims to minimise the segregation and labelling of individuals or the creation of ghettos that foster discrimination and victimisation. <input type="checkbox"/>
Need to advance equality of opportunity between people who share a protected characteristic and those who do not (eg. by removing or minimising disadvantages or meeting needs)	Yes	The strategy recognises the different needs of homeless households and coupled with operational practice, reasonable adjustments (such as direct letting to disabled applicants) are put in place to minimise disadvantage and increase life chances.

<p>Need to foster good relations between people who share a protected characteristic and those who do not (eg. by tackling prejudice or promoting understanding)</p>	<p>No</p>	<p>The emphasis on community resettlement and supporting homeless individuals to move on is central to the strategy aims. The need for cohesion and reducing inequalities is also recognised within the strategy with 'sustainable communities' identified as a priority.</p>
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If you answered 'YES' to any of the questions in 3a and 3b

Go straight to Question 4

If you answered 'NO' to all of the questions in 3a and 3b

Go to Question 3c and do not answer questions 4-6

3c. If you have answered 'No' to all the questions in 3a and 3b please explain why you feel that your policy/service has no relevance to equality.

4. EQUALITY INFORMATION AND ENGAGEMENT

4a. For a service plan, please list what equality information you currently have available, **OR** for a new/changed policy or practice please list what equality information you considered and engagement you have carried out in relation to it.

Please provide a link if the information is published on the web and advise when it was last updated?

(NB. Equality information can be both qualitative and quantitative. It includes knowledge of service users, satisfaction rates, compliments and complaints, the results of surveys or other engagement activities and should be broken down by equality characteristics where relevant.)

Details of the equality information or engagement	Internet link if published	Date last updated
Quality monitoring undertaken and reported to Government (P1E)		
Customer surveys		
Housing waiting list data		
Service monitoring data		

4b. Are there any information gaps, and if so how do you plan to tackle them?

[The Service intends to consult with the community and other providers to seek their views on the Strategy.](#)

5. CONCLUSIONS OF THE EQUALITY ANALYSIS

What will the likely overall effect of your policy/service plan be on equality?	The strategy will have a positive impact on homeless households, particularly for younger people (access to housing), disabled people (direct lets) and families (no B&B/hostel living). The wider role of housing in meeting basic needs, minimising disadvantage and enabling households to regain their independence is understood
If you identified any negative effects (see questions 3a) or discrimination what measures have you put in place to remove or mitigate them?	The influx of large numbers of homeless households in a small area can destabilise communities. We will continue to use dispersed accommodation (Community Resettlement) and sensitive lettings to minimise the impact.
Have you identified any further ways that you can advance equality of opportunity and/or foster good relations? If so, please give details.	
What steps do you intend to take now in respect of the implementation of your policy/service plan?	The strategy will be subject to consultation with the community, providers and other interested parties prior to the Strategy being submitted to Cabinet for approval.

6. MONITORING AND REVIEW

If you intend to proceed with your policy/service plan, please detail what monitoring arrangements (if appropriate) you will put in place to monitor the ongoing effects. Please also state when the policy/service plan will be reviewed.

An action plan to accompany the Strategy will be drawn up and monitored on a quarterly basis by management. Progress against the strategy and action plan will be reported to senior management and elected members.

COPIES OF THIS EQUALITY ANALYSIS FORM SHOULD BE ATTACHED TO ANY REPORTS/SERVICE PLANS AND ALSO SENT TO THE EQUALITY INBOX (equality@bury.gov.uk) FOR PUBLICATION.