
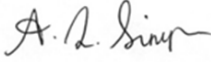


**OFFICER DELEGATION SCHEME
RECORD OF OPERATIONAL DECISION**



TO BE UPLOADED TO THE INTERNET BY DEMOCRATIC SERVICES

Date: 9 November 2021	Ref No: 2083	
Type of Operational Decision:		
Executive Decision <input checked="" type="checkbox"/>	Council Decision <input type="checkbox"/>	
Status: Public		
Title/Subject matter: Voids Management Policy 2021- approval for adoption for all specialised housing managed or commissioned by the OCO.		
Budget/Strategy/Policy/Compliance – Is the decision:		
(i) within an Approved Budget	Yes	
(ii) in accordance with Council Policy	Yes	
Equality Impact Assessment [Does this decision change policy, procedure or working practice or negatively impact on a group of people? If yes – complete EIA and summarise issues identified and recommendations – forward EIA to Corporate HR]	No	
Details of Operational Decision Taken:		
<ul style="list-style-type: none"> • To approve the adoption of the Voids Management Policy for all specialised housing managed or commissioned by the OCO. • To approve the circulation of the document to existing providers and Registered Housing Providers. • Delegate authority to the Strategic Lead, Integrated Commissioning, Carers, Physical Disability and Prevention to make any amendments to the Voids Management Policy required in the future reflecting any changes to housing legislation or OCO requirements. 		
Decision taken by:	Signature:	Date:
Executive Director of Strategic Commissioning		10 December 2021
Members Consulted [see note 1 below]		

Cabinet Member/Chair		10 December 2021
Lead Member		
Opposition Spokesperson		
<p>Notes</p> <p>1. It is not generally a requirement to consult with any Members on Operational Decisions but where a Chief Officer considers it necessary to consult with the appropriate Cabinet Member and/or Lead Member, they must sign the form so as to confirm that they have been consulted and that they agree with the proposed action. The signature of the Opposition Spokesperson should be obtained to confirm that he/she has been consulted.</p> <p>2. This form must not be used for urgent decisions.</p>		

1. Introduction

- 1.1 The creation of a Void Management Policy is essential to help address the operational and financial loss to the One Commissioning Organisation. Voids are properties which are currently empty because a tenancy has ended, and where a new tenancy has not yet started. Voids may arise due to formal termination of a tenancy, abandonment of a tenancy, the tenant transferring to another tenancy, eviction of the tenant or the tenant's death. See appendix 1 for the voids management policy.
- 1.2 As rent is not due on a void, this can represent a significant financial loss. The policy aims to keep loss to a minimum, whilst ensuring a property is let to the right applicant as quickly as possible, following the appropriate allocations policy.
- 1.3 The department aims to let every property to a tenant which is the best match for that property. However, on occasions, the council may hold an adapted property empty, until it is allocated to an applicant best matched.
- 1.4 The policy sets out an approach when dealing with void properties to ensure an efficient and customer focused service which:
- complies with regulatory and legislative requirements.
 - ensures value for money in repairing void properties and achieving re-let standard.
 - balances the need to minimise rent loss whilst letting empty properties to the right applicant and ensuring best use of the property.
 - maximises customer satisfaction in relation to the standard of their new home
 - is consistent with the demand across the One Commissioning Organisation (OCO) of Bury Council.
 - repurposes void properties to meet current demand and increase viability of letting a property.
 - Stand down void properties that neither meet the priority needs of residents nor meet the 'Checklist of accommodation standards and tenancy-related housing services in supported housing' policy. (See appendix 2)

2. Principles

2.1 The Policy will apply to all properties where there is a joint or part responsibility between Bury Council and Registered Providers.

2.2 It is underpinned by the following principles:

- Enabling inclusion in communities and decision making.
- Equality of housing choice.
- Enabling independent living in communities of choice for all Adult Social Care customers.
- Openness and transparency in decision making.
- Supporting priority needs of those people with adult social care needs.
- Ensuring high standards and good quality accommodation.
- Enables 'own front door' accommodation where possible.

3. Links to strategic direction

3.1 The policy is designed to meet the following strategic objectives to:

- Continue to improve the quality and accessibility of our services, meeting people's needs at different stages of their lives.
- Target investment effectively to maintain attractive, well-designed homes and places where people want to live.
- Extend housing and tenure choice for all people who require specialised housing in Adult Social Care setting.
- Demonstrate value for money and social impact.
- Minimise the loss of rental income as a result of properties being empty
- Ensure that housing providers make the most effective use of their housing stock to let to the best matched applicant(s).
- Ensure that properties are brought up to a consistent and acceptable standard when let.

4. Commissioning/ Procurement Implications

4.1 The policy will be the reference point for all future contractual and lease arrangements for future specialised housing developments commissioned and developed by the department. There should also be a review of historical arrangements with Registered Providers to ensure alignment with the new position outlined in the voids management policy.

4.2 All invoices for voids will be sent to the allocated Contracts Officer or Integrated Commissioning Support Officer at the Council to review and process, all new and existing Service Level Agreements (SLAs) will be reviewed to reflect this.

- All SLAs will be reviewed annually to ensure all regulations are abided to and reflect the principles of the Local Authority.
- On any new development (dependent on size and number of unit's) adequate time should be given to enable the safe and proactive staggered moving in of new tenants. This should be a minimum of 3 months and should be agreed between the Council, Registered Care Provider and the Housing Provider.

5. Financial Implications

5.1 Even though best efforts will be undertaken to avoid void costs this may still occur. Bury Councils position is:

- The Housing Provider should offer a 6 to 12- week void waiver in any 12 months of the calendar year per unit/ bedroom. Therefore, void costs would only begin after the 6-week period. This is to enable suitable arrangements to be undertaken to identify appropriate tenants for the scheme.
- The Registered Provider will work closely with the Council to allocate within a 6-week period. This is to allow time for Social Workers and the provider to

discuss care plans and packages and identify appropriate tenants and applicants for schemes.

- After a 6-week period, the Council will cover up to 50% of the rental loss due to voids with the Registered Provider.
- The Housing Provider will send an invoice for the void liability to the Registered Care Provider. The Registered Care Provider will then send an invoice for the Council's proportion to the Council.

6. Legal Implications

6.1 Bury Council's legal team will be informed of the change to policy so future arrangements reflect the policy. There will also be advice sought to negotiate alternative arrangements with current providers so there is fairness and equity in the manner which voids are managed for all parties on a one-by-one basis.

7. Associated Risks

7.1 There is a risk that the 6-week waiver for voids may not be ideal for Registered Providers, as this means cost implications to them. However, this can be mitigated by the ongoing development and efficiency of the Living Options Group (LOG) to ensure that potential tenants can be matched with properties quickly. Also, the Integrated Commissioning team will be developing an allocation policy specifically for specialised housing which will inform officers of process and timescales when actions need to be completed by.

8. Recommendation's

- Approve the adoption of the Voids Management Policy for all specialised housing managed or commissioned by the OCO.
- Approve the circulation of the document to existing providers and Registered Housing Providers.
- Delegate authority to the Strategic Lead, Integrated Commissioning, Carers, Physical Disability and Prevention to make any amendments to the Voids Management Policy required in the future reflecting any changes to housing legislation or OCO requirements.

9. Equality Analysis

9.1 There is not a disproportionate impact on the protected characteristics. The introduction of a voids policy would encourage the reduction of voids in the system and the quicker more efficient matching of people to available properties thus providing a positive impact/outcome on individuals.

10. Appendices

Appendix 1 – Voids Management Policy

Appendix 2 – Checklist of accommodation standards and tenancy-related housing services in supported housing

Ahmed Ajmi

Title: Integrated Commissioning Officer

Email address: A.Ajmi@bury.gov.uk

Date: 5 November 2021



Void Management Policy

One Commissioning Organisation (OCO)

September 2021

1. INTRODUCTION

Voids are properties which are currently empty because a tenancy has ended and a new tenancy has not yet started. Voids may arise due to formal termination of a tenancy, abandonment of a tenancy, the tenant transferring to another tenancy, eviction of the tenant or the tenant's death.

As rent is not due on a void, this can represent a significant financial loss. This policy aims to keep loss to a minimum, whilst ensuring that a property is let to the right applicant as quickly as possible, following the appropriate allocations policy.

Bury Council aims to let every property to a tenant which is the best match for that property. However, on occasions, the council may hold a highly adapted property empty, until it is allocated to an applicant best matched.

This policy sets out an approach when dealing with void properties to ensure that Bury Council provides an efficient and customer focused service which:

- complies with regulatory and legislative requirements
- ensures value for money in repairing void properties and achieving re-let standard
- balances the need to minimise rent loss whilst letting empty properties to the right applicant and ensuring best use of the property
- maximises customer satisfaction in relation to the standard of their new home
- is consistent with the demand across the One Commissioning Organisation (OCO) of Bury Council.
- repurposes void properties to meet current demand and increase viability of letting a property.
- Stand down void properties that neither meet the priority needs of residents nor meet the 'Checklist of accommodation standards and tenancy-related housing services in supported housing' policy.

2. PRINCIPLES

This Policy will apply to all properties where there is a joint or part responsibility between Bury Council and Registered Providers.

It is underpinned by the following principles:

- Enabling inclusion in communities and decision making
- Equality of housing choice
- Enabling independent living in communities of choice for all Adult Social Care customers
- Openness and transparency in decision making
- Supporting priority needs of those people with adult social care needs
- Ensuring high standards and good quality accommodation
- Enables 'own front door' accommodation where possible

3. OBJECTIVES

This policy is designed to meet the following strategic objectives to:

- Continue to improve the quality and accessibility of our services, meeting people's needs at different stages of their lives
- Target investment effectively to maintain attractive, well-designed homes and places where people want to live
- Extend housing and tenure choice for all people who require specialised housing in Adult Social Care setting
- Demonstrate value for money and social impact
- Minimise the loss of rental income as a result of properties being empty
- Ensure that housing providers make the most effective use of their housing stock to let to the best matched applicant(s)
- Ensure that properties are brought up to a consistent and acceptable standard when let.

4. Letting a Void Property

The expectation is to ensure void properties/bedroom are allocated with complete consideration of customer needs, the property and the local area.

When a property becomes a void, the Provider must:

- Inform the Registered Provider and the Council immediately.
- Obtain final meter readings for all utilities (gas, electricity and water) and notify the relevant suppliers of them.

5. Selection of New Tenant(s)

To ensure that void rent loss is kept to a minimum, the process of selecting a new tenant for a property should begin as soon as possible after notice is received from the outgoing tenant or the Council is made aware that the property will be available for re-letting.

Prospective tenants will be selected in accordance with the processes of the Living Options Group (LOG).

If possible, a viewing for a prospective tenant should be undertaken prior to the outgoing tenant leaving the property, in order to minimise any delay in allocating the property.

If unfortunately, a void occurs due to the death of a tenant, then the Council must be informed so arrangements can be made sensitively.

6. Low Demand Properties

Some housing stock is more difficult to let due to low levels of demand for the property type or area. A property will be considered to be low demand if there are no suitable applicants for 3 months within the void period.

If after a period of 3 months, the property or bedroom is not re-let, the Council will consider standing down arrangements with Registered Providers for a particular property/bedroom. This is to avoid further costs and also encourage alternative provision to be sourced which is better quality and location.

There may be occasions where a bedroom is void but is not fit for purpose for the particular customer group who are living in the property. In such circumstances, the Council will liaise with the appropriate Housing Benefit departments to consider alternative arrangements to cover rental loss.

7. Void cost recovery

Even though best efforts will be undertaken to avoid void costs this may still occur. Bury Councils position is:

- The Housing Provider should offer a 6 to 12-week void waiver in any 12 months of the calendar year per unit/ bedroom. Therefore, void costs would only begin after the agreed period. This is to enable suitable arrangements to be undertaken to identify appropriate tenants for the scheme.
- The Registered Provider will work closely with the Council to allocate within a 6 to 12 week period. This is to allow time for Social Workers and the provider to discuss care plans and packages and identify appropriate tenants and applicants for schemes.
- After a 6 to 12 week period, the Council will cover up to 50% of the rental loss due to voids with the Registered Provider.
- The Housing Provider will send an invoice for the void liability to the Registered Care Provider. The Registered Care Provider will then send an invoice for the Council's proportion to the Council.

All invoices for voids will be sent to the allocated Contracts Officer at the Council to review new and existing Service Level Agreements (SLA) will be reviewed to reflect this.

- All SLAs will be reviewed annually to ensure all regulations are abided to and reflect the principles of the Local Authority.
- On any new development (dependent on size and number of unit's) adequate time should be given to enable the safe and proactive staggered moving in of new tenants. This should be a minimum of 3 months and should be agreed between the Council, Registered Care Provider and the Housing Provider.

8. Quality and Performance

Monitoring and measuring performance levels of all voids across the housing stock will be monitored on a regular basis.

The Council will measure and evaluate performance against a range of appropriate and relevant performance indicators and will benchmark itself against other social housing providers and local authorities.

Appendix 2 – Checklist of accommodation standards and tenancy-related housing services in supported housing



Checklist of accommodation standards and tenancy-related housing services in supported housing

One Commissioning Organisation (OCO)

May 2021

Introduction

This checklist sets out standards for accommodation-related housing services that should be applied in all One Commissioned Organisation (OCO) supported housing. It covers legal requirements, minimum standards and what constitutes best practice.

While the intended audience is primarily supported housing landlords and managing agents, we believe all organisations involved in supported housing delivery will find the list beneficial and a useful reference point, and would encourage:

- It should inform OCO Commissioners, Provider Relationship officers and referral agencies of standards when placing or referring individuals into supported housing accommodation.
- It should inform housing enforcement strategies and approaches.
- It should be recognised that the supported housing sector in Bury is diverse and serves a wide range of customer groups with a variety of needs and requirements.

This checklist should be considered with this in mind, discretion and sound practical judgement should be exercised where a guideline does not apply to a certain group, situation or type of supported housing scheme.

Supported accommodation – general expectations and suitability

Minimum legal requirements

- Accommodation is safe and well maintained ([Sections 9A – 11 Landlord and Tenant Act 1985](#)).
- Landlords must ensure that their property, including any common parts of the building, is fit for human habitation at the beginning of the tenancy and throughout.
- Landlords must ensure their property is free of hazards by which is meant any defect which poses a risk of harm to the health or safety of the occupiers.
- Landlords must keep the structure and exterior of the property in repair and must keep the installations which provide water, gas, electricity, sanitation, heating and hot water, in proper working order.
- For supported housing with commissioned support, the accommodation will need to comply with the accommodation standards set out by commissioners. This may be higher than the minimum statutory standards in some cases.

Minimum standards

- Housing is accessible, suitably located, appropriate and suitable to meet the needs of residents, including health, care and support needs.
- Procedures and measures are in place to minimise risk and provide the best possible support to people in supported living settings in the context of the COVID-19 pandemic and or any other future pandemic.
- Accommodation is assessed by OCO commissioners, referring bodies, and by providers and their partners (e.g. providers of support services), for its suitability in meeting the needs of the specific vulnerable residents being accommodated. The individual's views and aspirations are sought and considered in the assessment.
- Accommodation needs are relevant to assessment and outcomes aspired, in line with the personalisation agenda.
- Housing staff demonstrate an understanding of supported housing services and should be provided with comprehensive training, with regular refreshers on key issues, and appropriate learning and development opportunities for their role. They develop competencies relating to safeguarding, equalities and building safety. Staff are supported to acquire appropriate qualifications, where relevant.
- All staff are suitably qualified or trained appropriately for the role they are in and encouraged to acquire appropriate and relevant qualifications by housing providers.
- Staff are supplied with the appropriate PPE and training in COVID-19 measures and follow the Public Health England [guidance on PPE in residential care/support settings](#).
- Staff and residents are considerate of neighbours, therefore external areas are kept clean and safe, and measures are in place to prevent and manage any anti-social behaviour.

Going further –best practice

- Accommodation is located near to amenities and transport, supporting social inclusion.
- There are efforts to engage the local community, for example over the standards of housing and housing services, or by allowing access to any facilities such as gyms, as appropriate.
- Residents are empowered and supported to engage with neighbours and the local community if they choose to.
- There are efforts to engage the local community voluntary and faith sector to offer a range of support and social connections, residents are empowered and supported to understand and take up this offer if they chose to.

Accommodation regulations and standards

Minimum legal requirements

The buildings comply with council standards or other statutory building and fire safety regulations and any other relevant wider applicable housing legislation.

The landlord must:

- Check and maintain gas safety (Gas Safety (Installation and Use) Regulations 1998)
- Ensure that furniture and furnishings comply with the regulations and are fire safe (Furniture and Furnishings (Fire) (Safety) Regulations 1988)
- Fit smoke and carbon monoxide alarms (The Smoke and Carbon Monoxide Alarm (England) Regulations 2015)
- Provide an Energy Performance Certificate (Energy Performance of Buildings (England and Wales) Regulations 2012)
- Provide a copy of the [How to rent: the checklist for renting in England guide](#)
- Buildings comply with relevant accessibility regulations, including on accessible and adaptable dwellings (Access to and use of buildings: Approved Document M, vol. 1 and 2).
- Accommodation is free from serious hazards, as assessed by the Housing Health and Safety Rating System.
- Landlord complies with House in Multiple Occupation management duties and licences property if necessary.
- Meet the standards set out in the 'Decent Homes Standard' if registered with the Regulator for Social Housing (or work closely with the Regulator to do so within an agreed timeframe if non-compliant).
- Oblige the Bury 2030 vision and Bury Housing Strategy (<https://www.bury.gov.uk/index.aspx?articleid=15839> and <https://www.bury.gov.uk/index.aspx?articleid=15729>)

Minimum standards

- Meet the standards set out in the 'Decent Homes Standard', even if not registered with the Regulator of Social Housing. If accommodation does not meet the standard, we would encourage the provider to instigate a plan to achieve compliance over a reasonable specified timeframe and to monitor, assess and report regularly against progress.
- Buildings are energy efficient – we recommend providers work towards a minimum target of Band C of the Energy Performance Certificate.
- Landlord provides an Electrical Installation Condition Report (EICR), ensuring remedial works or further investigative works are carried out to remedy any 'C1', 'C2' or 'F' classifications.

Going further –best practice

- Comply with House in Multiple Occupation management duties and licensing standards even where the property is formally exempt from licensing on the basis of being owned or managed by a housing association or other provider registered with the Regulator for Social Housing.
- Comply with the Code for Sustainable Homes, a single national standard for the design and construction of sustainable new homes.
- Comply with Secured by Design, a police initiative that improves the security of buildings and their immediate surroundings.
- For older people's housing, schemes comply with the Housing our Ageing Population Panel for Innovation (HAPPI) design principles.
- Where appropriate for the client group, the scheme is designed and developed in line with Psychologically Informed Environment principles.

Housing facilities

Minimum legal requirements

- Properties are appropriate size for the number of occupiers ([Housing Act 1985, Part X](#); [Housing Act 2004, Part 1 and 2](#)).
- Staff make reasonable adjustments to accommodation to meet residents' needs, for example if a resident is disabled (Equality Act 2010).

Minimum standards

- There are an adequate number of bedrooms. Except in emergency or short-term accommodation, unrelated adults are not expected to share bedrooms.
- Living space for daily activities is appropriate for the size of the household. There is common space such as community rooms.
- Accommodation provides residents with privacy and dignity, including private (as appropriate) space for dressing, showers, toileting, and accessible space for disabled users.
- Storage is provided to keep residents' personal belongings safe.

Going further –best practice

- Accommodation is welcoming and is designed to feel like a home, rather than an institution. Residents are consulted on changes to their spaces such as redecoration or use of communal areas.
- Residents are able to add to or change décor (within reason) to make their home feel more personal to them.
- Care is taken to consider additional facilities or spaces which can improve outcomes (e.g. communal areas or private spaces for meetings with support workers).
- Clear signage where needed, such as to communal areas (e.g. gym).

Housing safety and building condition

Minimum legal requirements

- Buildings are fit for human habitation ([Homes \(Fitness for Human Habitation\) Act 2018](#)) with no hazards.
- Buildings comply with relevant legislation on building maintenance and condition.
- There are policies and procedures in place for risks related to fire, asbestos and Legionella (where appropriate).

Minimum standards

Buildings are well maintained, with all amenities in good working order. This includes:

- lifts
 - appliances
 - windows
 - doors and locks
 - lighting
- Room temperatures are adjustable with appropriate heating/cooling systems. Residents can control heating within their homes.
 - There are clear procedures for residents to report issues.
 - Maintenance problems are addressed and fixed in a timely and responsive manner.
 - All repairs are followed up in a timely manner relevant to the type of repair required.
 - There are clear procedures and processes to address non-routine or emergency repairs.
 - Grounds are maintained in all seasons, with timely removal of ice and snow.
 - There are policies and procedures in place for risks including electrical safety and emergency planning.
 - Housing providers follow the Public Health England guidance for supported living settings.
 - Accommodation is built to high accessibility standards so appropriate additional adaptations are easy and affordable to install. This can include, as needed, functioning alarm points, e.g. call bells, which are tested and maintained regularly; grab rails in bathrooms, showers and toilets and anti-scalding controls, for example in accommodation for older people or people with learning difficulties
 - There are closed containers for disposal of sharp objects.
 - Trip hazards are managed - all stairways and halls are lit adequately, with handrails and non-slip rugs where needed.
 - Windows are fitted with plastic or safety glass (even where not required by building codes).

Going further –best practice

- A planned programme is in place to minimise preventable deterioration of the buildings, accommodation, grounds, equipment and furnishings, and that all such are well maintained and in good working order. This includes a preventative maintenance and repair programme and schedule with regular inspections to check building and equipment conditions and to ensure repairs and servicing takes place.
- Timescales for non-emergency repairs may be agreed with residents to create a more resident-focused approach.
- Housing and property managers examine the physical buildings on a regular basis to identify problems areas in safety and security.
- Housing staff inspect property units whenever a new resident moves in, and at least annually.

- Each property has a safety plan, with a clear reporting line for responding to building emergencies. Residents are engaged on issues related to safety through existing or dedicated committees including residents, housing and support staff.

Tenancy and licence agreements

Minimum legal requirements

- All housing-related fees are listed, including tenancy fees, deposits, management fees and service charges ([Landlord and Tenant Act 1985](#)).
- Tenants are not evicted without proper procedure or legal proceedings.
- Residents are never to be charged for normal wear and tear. Residents may be charged where the tenant has caused extensive damage to a unit.
- Costs for rent and eligible services charges are transparent and reasonable

Minimum standards

- Residents in supported housing have the most secure form of tenancy compatible with the purpose of the housing and the client's needs and circumstances. The tenancy agreement or license is provided quickly.
- The terms of tenancies and licences are fair and transparent and take into account the housing needs and aspirations of residents. (Based on assessment).
- Residents' rights, choices and control over their homes are respected, while taking into account the needs of other residents and any access rights which may be required.
- Records are kept for each resident, relating to housing fees, their deposit, rent arrears, any accommodation issues, and notes on any proposed eviction or transfer.
- There are clear procedures which set out the circumstances when the person can be moved on, e.g. if their care needs change
- There are clear procedures for eviction, with a focus on working with the individual to avoid or prevent eviction where possible. Providers work to find solutions to sustain accommodation.

Going further –best practice

- All residents are helped by housing staff to understand their rights and responsibilities under the tenancy.
- Housing staff assist residents with managing rental payments and rent arrears where needed.
- There are procedures in place to prevent the need for eviction ever arising, where possible.

Resident communication and engagement

Minimum legal requirements

- In HMOs, name and contact details of the landlord must be made available to residents and clearly displayed ([The Management of Houses in Multiple Occupation \(England\) Regulations 2006](#)).

Minimum standards

- Communication and information are clear, easy to follow and appropriate to the needs of residents.
- Name and contact details of the landlord are made available to residents and clearly displayed.
- Clear information is provided to residents on how their rent and service charges are set.
- House rules, which respect residents' rights and independence, are in place and clearly displayed. The rules are developed with input from residents where possible.
- Protections are in place to protect residents from anti-social behaviour from other residents, as well as from abuse by staff or visitors.
- Clear, simple and accessible complaints and redress procedures are in place.

Going further –best practice

- Staff actively seek resident feedback on the housing and housing services, ideally through a range of methods such as informal chats, meetings, surveys and suggestion boxes.
- Resident feedback is used to make relevant or required changes/ developments to housing and or schemes.
- Prospective residents are provided with an information pack including information on all rents and service charges, including notice periods for increases, and procedures for complaints and redress and dispute resolution. The pack could also list all routines and house rules.
- All written material for residents is in plain English and staff are able to help explain if needed.
- All written material and signage are available in easy read, for support with this the provider, Bury People First can assist.
- There is assistance for residents whose first language is not English, who are non-verbal or who have limited understanding.
- Prospective and new residents are shown around and orientated on first arrival, including providing details of the move-in conditions and emergency exits.
- A nominated person (e.g. family member) is able to be appointed to assist with all accommodation issues.