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Meeting	CABINET
Time/Day/Date	5.00 pm on Tuesday, 12 December 2023
Location	Abbey Room, Stenson House, London Road, Coalville, LE67 3FN
Officer to contact	Democratic Services (01530 454512)

AGENDA

Item	Pages
1. APOLOGIES FOR ABSENCE	
2. DECLARATION OF INTERESTS	
Under the Code of Conduct members are reminded that in declaring interests you should make clear the nature of that interest and whether it is a disclosable pecuniary interest, registerable interest or other interest.	
3. PUBLIC QUESTION AND ANSWER SESSION	
4. MINUTES	
To confirm the minutes of the meeting held on 21 November 2023	3 - 4
5. REVIEW OF HOUSING ALLOCATIONS POLICY	
The report of the Strategic Director of Communities Presented by the Housing and Property Portfolio Holder	5 - 58
6. HOMELESSNESS STRATEGY	
The report of the Strategic Director of Communities Presented by the Housing and Property Portfolio Holder	59 - 90
7. NWLDC CORPORATE SPONSORSHIP AND ADVERTISING POLICY	
The report of the Strategic Director of Place Presented by the Business and Regeneration Portfolio Holder	91 - 114

Circulation:

Councillor R Blunt (Chair)
Councillor M B Wyatt (Deputy Chair)
Councillor T Gillard
Councillor K Merrie MBE
Councillor N J Rushton
Councillor A C Saffell
Councillor A C Woodman

MINUTES of a meeting of the CABINET held in the Abbey Room, Stenson House, London Road, Coalville, LE67 3FN on TUESDAY, 21 NOVEMBER 2023

Present: Councillor R Blunt (Chair)

Councillors M B Wyatt, T Gillard, K Merrie MBE, N J Rushton, A C Saffell and A C Woodman

In Attendance: Councillors P Lees

Officers: Mrs A Thomas, Mr J Arnold, Mrs A Crouch and Mrs R Wallace

48. APOLOGIES FOR ABSENCE

There were no apologies received.

49. DECLARATION OF INTERESTS

There were no interests declared.

50. PUBLIC QUESTION AND ANSWER SESSION

There were no questions received.

51. MINUTES

The minutes of the meeting held on 24 October 2023 were considered.

It was moved by Councillor T Gillard, seconded by Councillor K Merrie and

RESOLVED THAT:

The minutes of the meeting on 24 October 2023 be approved as an accurate record of proceedings.

52. 2023/24 QUARTER 2 GENERAL FUND AND HOUSING REVENUE ACCOUNT (HRA) FINANCE UPDATE

The Corporate Portfolio Holder presented the report.

It was moved by Councillor N Rushton, seconded by Councillor A Woodman and

RESOLVED THAT:

- 1) The virements as detailed in Appendix 1(b) be approved.
- 2) The supplementary estimates detailed in Appendix 2 (b) which are below £100k and are externally funded be noted.
- 3) The supplementary estimates detailed in Appendix 2(b) which are above £100k and are externally funded be approved.
- 4) All supplementary estimates detailed in Appendix 2(b) which required Council funding be approved.
- 5) The Strategic Director of Resources be delegated to approve supplementary estimates below £10,000 requiring Council funding.
- 6) The revised 2023/24 General Fund Capital Programme Budget detailed in Appendix 3 be noted.
- 7) The revised 2023/24 Housing Revenue Account (HRA) Capital Programme Budget detailed in Appendix 4 be noted.

Reason for decisions: To request approval for the virements and supplementary estimates that are dedicated to Cabinet.

53. MINUTES OF THE COALVILLE SPECIAL EXPENSES WORKING PARTY

The Business and Regeneration Portfolio Holder presented the report.

A Member welcomed the Portfolio Holder's support for Coalville in Bloom and emphasised the value of the event to the town.

It was moved by Councillor T Gillard, seconded by Councillor M Wyatt and

RESOLVED THAT:

- 1) The minutes of the Coalville Special Expenses Working Party at Appendix 1 be noted.
- 2) The recommendations made by the Working Party at its meeting on 10 October 2023 be approved.

Reason for Decision: So that the decisions of the Coalville Special Expenses Working Party can be considered.

54. EXCLUSION OF THE PRESS AND PUBLIC

It was moved by Councillor R Blunt, seconded by Councillor T Gillard, and

RESOLVED THAT:

In pursuance of Section 100A(4) of the Local Government Act 1972, the press and public be excluded from the remainder of the meeting on the grounds that the business to be transacted involves the likely disclosure of exempt information as defined in Paragraph 3 of Part 1 of Schedule 12A to the Act and that the public interest in maintaining this exemption outweighs the public interest in disclosing the information.

Reason for decision: To enable the consideration of exempt information.

55. ENFORCEMENT AGENCY SERVICES

The Corporate Portfolio Holder presented the report.

It was moved by Councillor N Rushton, seconded by Councillor R Blunt and

RESOLVED THAT:

The recommendations within the report be approved.

Reason for Decision: The value of the contract is £1.7million and therefore approval to award is required from Cabinet in accordance with the Council's Contract Procedure Rules. This is a Concession Contract.

The meeting commenced at 5.00 pm

The Chairman closed the meeting at 5.05 pm

NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

CABINET – TUESDAY, 12 DECEMBER 2023



Title of Report	REVIEW OF HOUSING ALLOCATIONS POLICY	
Presented by	Councillor Andrew Woodman Housing, Property and Customer Services Portfolio Holder PH Briefed <input type="checkbox"/> Yes	
Background Papers	Review of Housing Allocations Policy Community Scrutiny Report 28th September 2023 Review of Housing Policies Cabinet Report 6th February 2018	Public Report: Yes Key Decision: Yes
Financial Implications	There are no direct financial implications arising from the review of the policy. Signed off by the Section 151 Officer: Yes	
Legal Implications	The Council's legal team have reviewed the report and the policy. Signed off by the Monitoring Officer: Yes	
Staffing and Corporate Implications	There are no staffing or corporate implications. Signed off by the Head of Paid Service: Yes	
Purpose of Report	To seek Cabinet agreement to amendments to the Council's Housing Allocations and Lettings Policy	
Reason for Decision	To agree amendments to the Council's Housing Allocations Policy.	
Recommendations	THAT CABINET 1. APPROVES THE REVISED HOUSING ALLOCATIONS AND LETTINGS POLICY 2. DELEGATES AUTHORITY TO THE HEAD OF HOUSING IN CONSULTATION WITH THE PORTFOLIO HOLDER TO MAKE MINOR CHANGES TO THE POLICY AS REQUIRED TO ADDRESS CHANGES IN NATIONAL POLICY AND DEMAND.	

1.0 BACKGROUND

- 1.1 All local housing authorities are required to set up and maintain an allocations scheme under Part 6 of the Housing Act 1996.
- 1.2 The Council fulfils this requirement through the Housing Allocations and Lettings Policy. The Policy sets out amongst other things who is allowed to join the housing register as well as the relative priority, applicants will receive for housing and how allocations will be made.
- 1.3 The Policy applies to lettings made to Council Housing as well as Registered Provider properties over which the Council has nomination rights.
- 1.4 Currently there are around 900 households on the housing register and around 350 homes let each year.

2.0 CONSULTATION

- 2.1 The revised Policy has been developed in consultation with a range of key partners and stakeholders. Consultation and engagement has included:
 - An online public survey promoted to current and recent service users of the housing choices service
 - A presentation to the Tenants and Leaseholders Consultation Forum
 - A member workshop held on 29 August 2023
 - A workshop with allocations staff of partner registered providers held on 4 September 2023.
- 2.2 Feedback across all of these activities has fed into the revised Policy.
- 2.3 The Policy was considered by Community Scrutiny Group on 28 September 2023. The minutes of that meeting are attached as an appendix to this report. Community Scrutiny Group requested an opportunity to review the impacts of the changes to the policy six months after implementation.
- 2.4 Following on from Community Scrutiny, the draft policy was shared with key stakeholders for comment. It was not necessary to make any changes to the draft considered by Community Scrutiny as a result of comments received as they were all supportive of the proposed Policy rather than suggestions for changes.

3.0 KEY CHANGES FROM THE EXISTING POLICY

- 3.1 The revised policy is broadly similar to the existing Policy. The most significant change that impacts on the banding of applications is in relation to how it is proposed homeless households are treated who will be afforded a higher priority at an earlier stage in their homelessness application. It is expected this will reduce the number of homeless households needing to access emergency accommodation and increase the number of cases where homelessness is prevented (see section 7.26 onwards.) This change supports the emerging priorities of the updated homelessness strategy. The Policy also introduces a formal procedure for making direct matches to certain homeless households who do not secure alternative accommodation through the bidding process. This approach reflects current advice from the Department for

Levelling Up, Housing and Communities (DLUHC) advisors and supports the Policy objective of reducing the number of households in temporary accommodation.

- 3.2 The revised Policy also renames the housing needs bands replacing priority and high with critical and urgent. These better reflect the importance of resolving a housing situation in as short a period of time as possible and so reinforces the expectation that applicants in these bands bid on all properties suitable for them.
- 3.3 Qualification for the register has also been reviewed and this has led to updated income and savings thresholds and extended the qualifying period for a local connection as a result of residence in the district from six months to twelve. This reflects the feedback from the consultation and aligns the Council more closely with near neighbours. Income levels have reduced for single people and couples and increased slightly for families. The savings threshold for all groups has reduced.

4.0 IMPLEMENTATION AND POST IMPLEMENTATION REVIEW

- 4.1 The Council is currently implementing a new ICT system to manage the housing register and the letting of affordable rented homes. Changes to the Policy will be implemented as part of the changeover to the new system in Spring 2024.
- 4.2 As identified above, a review of the changes will be carried out around six months after the new Policy takes effect to understand the implications of the changes. If necessary a further revised policy would be brought back to Cabinet at that time for further consideration. The Housing Strategy Team will then continue to monitor the effectiveness of the policy together with changes to demand for accommodation alongside legislative changes and national policy to identify when further revisions are necessary.

Policies and other considerations, as appropriate	
Council Priorities:	<ul style="list-style-type: none"> - Communities & Housing - A Well Run Council
Policy Considerations:	None.
Safeguarding:	The Policy does not directly impact on safeguarding but does allow for preference to be given to those who need to move for safeguarding reasons.
Equalities/Diversity:	An Equality Impact Assessment has been undertaken and no adverse impacts on protected groups have been identified.
Customer Impact:	This Policy has a direct impact on service users as it identifies how social housing will be allocated in the district. It has been framed to ensure those in greatest need are best placed to access social housing.
Economic and Social Impact:	The Policy is framed to assist people who need to move for economic reasons. Local connection considers those who work in the district.
Environment, Climate Change and Zero Carbon:	None directly although the Policy can be used to transfer existing social tenants to allow upgrade work to take place more cost effectively on their current home.

<p>Consultation/Community/Tenant Engagement:</p>	<p>The revised Policy has been developed in consultation with a range of key partners and stakeholders. Consultation and engagement has included</p> <ul style="list-style-type: none"> • An online public survey promoted to current and recent service users of the housing choices service • A presentation to the Tenants and Leasholders Consultation Forum • A member workshop • A workshop with allocations staff of partner registered providers <p>Following on from Community Scrutiny the policy was shared with key stakeholders for comment.</p>
<p>Risks:</p>	<p>No risks identified.</p>
<p>Officer Contact</p>	<p>David Scruton Housing Strategy and Systems Team Manager David.scruton@nwleicestershire.gov.uk</p>



NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

ALLOCATIONS AND LETTINGS

POLICY

December 2023

North West Leicestershire District Council
PO Box 11051
Coalville
LE67 0FW
Tel: 01530 454545

NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

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Introduction

There is a limited supply of affordable housing in North West Leicestershire and an increasing number of people seeking social housing.

North West Leicestershire District Council aims to allocate the available housing fairly and objectively following the approach described in this Allocation Policy.

The Allocation Policy works within the legal and regulatory framework governing the allocation of social housing. This scheme also takes into account local need and demand as well as local housing conditions.

North West Leicestershire operates a Choice Based Lettings Scheme. This allows applicants to have as much choice as possible in relation to the options they have to meet their housing needs. The Choice Based Lettings approach aims to provide home seekers with information about lettings so they are able to make informed and realistic choices when seeking housing. There are some circumstances where we may have to limit choice to meet our statutory obligations, for example in the case of some homeless households. In these cases, the home seeker will, wherever possible, have first been given an opportunity to resolve their situation through their own housing choices.

North West Leicestershire District Council has in place agreements with private registered providers of social housing in the District which allows a wider range of social housing to be made available via the Council's Choice Based Lettings Scheme.

The Allocations and Lettings Policy ensures that those home seekers who are in urgent housing need are given reasonable preference within the Choice Based Lettings scheme.

This Allocation Scheme is subject to periodic review to ensure that the allocation of properties continues to be fair and objective whilst meeting local need and statutory obligations.

Objectives of North West Leicestershire's Choice Based Lettings scheme

- To meet the legal requirements for the allocation of affordable housing
- To ensure appropriate levels of priority are afforded to home seekers.
- To ensure priority status on the scheme for home seekers with an urgent housing need
- To offer as much choice to home seekers as is reasonably possible.
- To let properties in a fair and transparent way
- To support and assist vulnerable home seekers so that they are able to actively participate in North West Leicestershire's Choice Based Lettings scheme.
- To provide feedback to home seekers about homes let through North West Leicestershire's Choice Based Lettings scheme.
- To encourage and support sustainable communities and social inclusion.

- To ensure home seekers are treated fairly, individually and in accordance with the commitment to Equality and Diversity.
- To make best use of affordable housing, to meet the needs of the local community.
- To ensure that properties are let as quickly as possible.

Legislative Context

This Allocation Scheme is governed by the following legislation and guidance, subject to the issue of any further guidance by the Secretary of State:

- Housing Act 1996 (as amended)
- Housing Act 2004, s223 Allocation of housing accommodation by local authorities
- Localism Act 2011 (Parts 6 and 7)
- The Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006
- The Allocation of Housing and Homelessness (Eligibility) (England) (Amendment) Regulations 2012
- Homelessness Code of Guidance for Councils (July 2006)
- Draft Homelessness Code of Guidance for Local Authorities (October 2017)
- The Homelessness (Suitability of Accommodation) (England) Order 2012
- Allocation of accommodation: guidance for local housing authorities in England, 2012
- The Allocation of Housing (Qualification Criteria for Armed Forces Personnel) (England) Regulations 2012
- The Housing Act 1996 (Additional Preference for Armed Forces) (England) Regulations 2012
- Allocation of accommodation: guidance for local housing authorities in England (Oct 2013)
- The Homelessness Reduction Act 2017

Reasonable Preference

- Under section 166A of the Housing Act 1996 the Council is required to give reasonable preference to the following categories of person:
- Homeless people as defined by Part VII of the 1996 Housing Act, including people who are intentionally homeless and those who are not in priority need.
- People who are owed a duty under section 190(2), 193(2) or 195(2) of the 1996 Act (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any housing authority under s192(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 grounds relating to disability.
- People who need to move to a particular locality in the housing authority area, where failure to meet that need would cause hardship (to themselves or others).

Additional Preference

Under Section 166A (3) of the Housing Act 1996, the Council can give additional preference to applicants that fall within the reasonable preference categories and have urgent housing needs. This means the Council can decide which applicants within a particular category should be given the greatest priority for housing, and which groups should be prioritised over others.

Additionally, the Council must give additional preference for members of the Armed and Reserve Forces who fall into a reasonable reference category and have urgent housing needs. The preference rule applied can be found in section 7.43.

Urgent housing needs are considered to include: those who need to move urgently because of a life threatening illness or sudden disability; families in severe overcrowding which poses a serious health hazard; those who are homeless and require urgent re-housing as a result of violence or threats of violence, including intimidated witnesses, and those escaping serious anti-social behaviour or domestic violence.

Equal Opportunities

North West Leicestershire's Choice Based Lettings scheme promotes equal opportunities in the services it provides. Our aim is to implement and maintain services which ensure that no potential, or current home seeker is treated less favourably on the grounds of gender, marital status, race, nationality, ethnic or national origin, colour, disability, age or sexual orientation nor is disadvantaged by the application of a rule, condition, or requirement, which has a discriminatory effect which cannot be justified by law.

Help and assistance is available to ensure that all households are able to access North West Leicestershire's Choice Based Lettings scheme. Information can be translated or made available in large print, or other formats. North West Leicestershire's Choice Based Lettings scheme seeks to ensure that it is accessible to all home seekers by ensuring that individuals who may have difficulty in participating in the scheme receive the help and assistance they require. The Housing Choices Team will assist those who do not have a family member, friend, or advocate who can do this on their behalf.

North West Leicestershire's Choice Based Lettings scheme operates in accordance with the Council's Equality and Diversity Policy.

Data Protection

Home seekers have the right to information on all decisions made about the facts of their application. Applicants have the right to see the information held about them, and receive a copy of information held on computer, or on paper file. This is a "subject access request" for which the Council charges a reasonable administration fee.

Information held by North West Leicestershire's Housing Advice Team about home seekers will only be used in connection with their application for housing. Information

will be held and used in accordance with the Data Protection Act 2018 and any subsequent legislation. In normal circumstances, this information is only to be disclosed to partner Registered Providers or other landlords who may be able to offer accommodation. This means that the information and the fact that a home seeker has applied for housing, will not normally be passed onto any third parties without the home seeker's prior consent, or in exceptional circumstances where disclosure without consent is warranted. These circumstances are defined below:

- Where there are over-riding legal, social, or public interest considerations, e.g. there is a risk of serious harm to the person themselves or others if the information is not disclosed.
- Where information is required by the police as part of a criminal investigation.
- Where information is required by an authority for the assessment or collection of any tax or duty of a similar nature
- Where, because the Council is under a duty to protect the public funds it handles, it may need to use the information provided by home seekers, to prevent and detect fraud. (The information may also be shared for the same purposes with other organisations that handle public funds).
- The information may also be used for statistical purposes, which means we may pass anonymised information, in confidence, to the relevant government department.

There may be circumstances that require a third party to be contacted for information in order to verify the circumstances of an applicant for registration or banding purposes. Home Seekers will be asked for permission for this contact to be made however they should be aware that not granting permission may mean the Council is unable to complete assessment of their housing application. In these circumstances the relevant third party will by default be aware that a housing application has been submitted.

1. The Housing Register

- 1.1 North West Leicestershire District Council maintains a register of home seekers who wish to be accommodated by the Council and/or Registered Providers operating in the North West Leicestershire District. This register is not "open," and this policy sets out the criteria for admission onto the register as well as how priority will be granted between applicants.
- 1.2 Properties that become available to let will normally only be allocated to home seekers on the housing register.

Joining the housing register

- 1.3 Subject to the eligibility and qualification rules set in Section 2, any person over the age of 16 can apply to join the housing register. There are special provisions for 16 and 17 year olds which are detailed in Section 3 of this policy.
- 1.4 Every home seeker must complete an on-line registration form. The information given on the form must be correct. North West Leicestershire District Council

reserve the right to disqualify any home seeker from joining the register, withdraw any offer of a tenancy or assist the landlord to recover possession of an existing tenancy if they have knowingly given false information.

- 1.5 Home seekers must provide proof to support their application; for example, they will be asked to provide proof of identity, income, benefits, access rights to children and levels of capital. The application form will clearly set out what proofs are required.
- 1.6 North West Leicestershire's Housing Choices Team will make any other enquiries as they deem necessary in order to assess the application. This may involve contacting previous landlords, health or medical advisors, police, or other relevant agencies.
- 1.7 Home seekers must provide a mailing address to which correspondence can be sent. The address can be the home seeker's home address or an alternative such as that of a family member or friend.

Applicants Responsibilities

1.8 Supplying Information

- Applicants are responsible for giving full and accurate details on all forms and correspondence and in all other communications about their application for housing.
- Applicants must inform the Council of any change in circumstances straight away, especially those which may affect their needs for re-housing.
- Applicants should reply to any correspondence/requests from the Council or Registered Provider which needs a reply, within the specified timescales.
- Applicants who are made an offer should let the Council or Registered Provider know their decision about whether to accept it within the timescale specified.
- If information is not supplied, the Council or Registered Provider may cancel an application, defer it until the information is provided, or withdraw an offer of housing.

1.9 Deliberately Worsening Circumstances

Home seekers have a responsibility not to deliberately worsen their circumstances in order to progress to a higher band by an action or inaction. They have the responsibility to make best use of the accommodation they have available to them and will be assessed as if this is the case.

- 1.10 Home seekers should not deliberately deprive themselves of capital or assets in order to gain access to the housing register. This will be treated as a deliberate worsening of circumstances.
- 1.11 Should the home seeker be found to have deliberately worsened their circumstances then they will be placed in the low band for a period of 12 months as per the criteria set out in section 7.23.

Review of the housing register

- 1.12 North West Leicestershire District Council will aim to undertake a 12-month rolling review of the housing register. Home seekers will be contacted and asked to confirm whether they wish to remain on the register and whether their circumstances have changed.
- 1.13 Home seekers who do not respond to the review as requested will have their application cancelled. Under normal circumstances an application can be reinstated if the applicant makes contact within three months of the cancellation date.
- 1.14 The decision to reinstate an application more than three months after it is cancelled will be at the Council's discretion. Where an application is not reinstated the applicant may submit a fresh application and this will generate a new application date.

2. Eligibility and qualification

- 2.1 In considering housing register applications, North West Leicestershire District Council will assess:
- Eligibility - whether a home seeker is eligible for an allocation of accommodation because they meet national, legal eligibility criteria, and
 - Qualification – whether a home seeker meets the local criteria for accessing social housing, as described in this policy in sections 2.4 -2.14
- 2.2 Only applicants who are eligible for housing and who qualify for an allocation of housing will be included on the Council's housing register and considered for offers of accommodation. Applicants who are not eligible or do not qualify for housing will not be included on the housing register.
- 2.3 If an applicant has already been included on the housing register and is found to no longer be eligible for housing, or to no longer qualify for housing, they will be removed from the housing register and notified. Home seekers will have the opportunity to use the review procedure if they feel this decision is incorrect (see section 4).

Eligibility

- 2.4 Eligibility will be assessed in accordance with the regulations. Namely, whether a home seeker is eligible to join the housing register or, may not be allocated accommodation under Part 6 of the Housing Act 1996 S.160ZA because they are persons from abroad who are subject to immigration control or they are a person from abroad, who although not subject to immigration control, are to be treated as ineligible for an allocation of accommodation. Reference will be made to the regulations setting out which classes of persons from abroad are eligible

or ineligible for an allocation of accommodation which are currently contained in the Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006 (SI2006 No. 1294) and amendment regulations in respect of regulations 4 and 6. However if these regulations are subsequently superseded this policy will by default apply those currently in force.

- 2.5 North West Leicestershire District Council reserves the right to seek independent advice and assistance to resolve the issue of eligibility.

Qualification

- 2.6 The following circumstances will exclude an applicant from the housing register.

- 2.7 **Home seekers with no local connection to North West Leicestershire as set out in section 18**– other than in exceptional circumstances, home seekers from outside the district who have no local connection to the district, will not qualify for social housing. The Council may from time to time allow access to the housing register to applicants without a local connection on the basis that they are only entitled to receive offers on hard to let properties. This is entirely at the Council's discretion.

- 2.8 **Home seekers with the financial means to meet their own housing need** – these home seekers will not qualify for social housing unless they can demonstrate that they have a need for specialist supported, sheltered or extra care housing which they cannot purchase or rent on the open market, or, where the home seeker has a need for wheelchair adapted or other specialist accommodation and they do not have the financial means available (through savings, grants or Equity Loan) to adapt their existing property or the property is not suitable for adaptation and they do not have sufficient resources to secure alternative accommodation that meets their needs (in these circumstances the applicant will usually be restricted to bidding on properties that meet these identified needs).

Exemptions may be applied where the home seeker only wishes to be considered for hard to let properties.

The tests applied to assess financial means can be found in Appendix Two. These will be reviewed annually and amendments if required applied on the 1 January each year

- 2.9 Being a Home Owner is not a barrier to joining the housing register, however, any offers of accommodation made to a homeowner would be subject to the applicant demonstrating that the property is affordable and that they would satisfy the requirement of occupying the home they were allocated as their main/principal home.

- 2.10 **Home seekers who lack the capacity to enter into and sustain a tenancy agreement** – home seekers will not qualify for social housing if it is considered

that they lack the mental capacity to enter into a tenancy agreement and the obligations and conditions attached to that tenancy. Before making a decision on capacity the Council will seek representations from professional and other appropriate agencies. Where a home seeker is considered not to have the capacity to hold a tenancy, the Council will work with the appropriate agencies to identify alternative approaches to securing accommodation.

- 2.11 Home seekers considered to be guilty of unacceptable behaviour serious enough to make them unsuitable as a tenant** - Home seekers will not qualify for social housing if they are considered to be unsuitable to be a tenant. This must be evidenced and proportionate and take account of the seriousness of the behaviour, the length of time since occurrence, the situation of the home seeker at the time of the event(s) and what steps have been taken to prevent future incidents. Where a home seeker has been found to be intentionally homeless and they are the perpetrator of unacceptable behaviour they will not be eligible to join the housing register.

The following are examples but not an exhaustive list of reasons as to why a home seeker would not qualify for social housing, either at the point of application or at any time during their time on the housing register.

- a) Behaviour that would give grounds for mandatory possession. For example anti-social behaviour such as causing nuisance and annoyance to neighbours
- b) Behaviour of the home seeker or a member of the home seeker's household which would entitle the landlord to gain an outright possession order
- c) Owing a housing related debt greater than £500 to a Council, registered provider or private landlord and there is no evidence of willingness to reduce/repay the debt. Housing debts could include rent arrears, court costs, temporary accommodation charges, sundry debts such as clearance, damage, council tax or repayment of rent deposit (this is not an exhaustive list).
 - i. A willingness to pay will usually be considered as regular payments made over a 12-week period to reduce the debt as part of an agreement with the organisation the debt is owed to. Except in exceptional circumstances all agreed payments over this time period should be made without fail. To remain on the register the home seeker will be expected to maintain these payments until the debt is clear.
 - ii. In cases of overriding housing need home seekers may be accepted on to the housing register but placed in low band until such time as they are able to demonstrate willingness to pay.

In some circumstances where repayment could lead to further financial hardship a repayment period may be waived. Each case will be considered on its merits and the Council may take into account what other measures a homeseeker is taking to address their financial situation.

- d) Committing certain criminal offences in or near the home and posing a threat to neighbours, the community, staff from the Council, the Council's contractors or Registered Provider or their contractors
- e) Having been convicted of violence towards a partner or members of the family
- f) Obtaining a tenancy by deception, for example giving false information.

2.12 When making this decision North West Leicestershire District Council will consider:-

- a) *What action a landlord would have taken against the perpetrator of the unacceptable behaviour.*

The behaviour must be serious enough that a Landlord would have been entitled to an outright possession order under schedule 2 of the Housing Act 1985 or Schedule 2 of the Housing Act 1988. As an example, cases relating to noise problems, domestic violence, racial harassment, intimidation and drug dealing would probably lead to a possession order. (This is not an exhaustive list)

- b) *Whether the behaviour is serious enough to make the home seeker unsuitable as a tenant.*

As an example, accrual of rent arrears that have resulted from factors outside of the home seeker's control, e.g. delays in housing benefit payments or liability for a partner's debts may not be serious enough to make the home seeker unsuitable as a tenant.

- c) *When the unacceptable behaviour took place.*

Consideration will be given to the length of time that has elapsed, whether there has been any change in circumstances and behaviour, and whether there are any mitigating circumstances to consider. Evidence of the home seeker working with agencies to mitigate the likelihood of the behaviour occurring in the future will be taken into consideration.

2.13 All three elements of 2.12 above shall be taken into consideration. When making this decision the Council will consider whether the decision is reasonable taking into account all relevant factors impacting on the home seeker and their household.

2.14 If a home seeker has previously been disqualified for social housing because of unacceptable behaviour but now considers that their circumstances have changed sufficiently they should complete a new housing application. The home seeker will need to demonstrate that their circumstances have changed sufficiently that the above no longer applies, for example, that there has been a sufficient lapse of time since the previous application was submitted and there is evidence of sustained behavioural change.

- 2.15 The decision to exclude anyone from the register on the basis that they do not qualify for social housing rests with the Housing choices Team Leader , and home seekers will be informed in writing of the reason why their application has been rejected. They will have the opportunity to appeal against this decision if they feel it is incorrect (see Section 4).
- 2.16 Home seekers who reapply within a year of securing new social housing- Home seekers will not normally be allowed onto the housing register if they are an introductory or starter tenant within the first year of a social tenancy unless this has been agreed when granting the tenancy or where there has been a significant change in circumstances that was not foreseeable at the time the tenancy was granted.
- 2.17 Where an applicant has demonstrated behaviours that make them unsuitable to be a tenant but would qualify for specialist accommodation or accommodation with specialist support an applicant may be accepted onto the register subject to restrictions as to the accommodation they can be offered. In such circumstances an applicant will be subject to limitations on their availability to bid through choice based lettings and limited to nominations/allocations through alternative arrangements. The applicant will be clearly informed of this at the time of their acceptance onto the register.
- 2.18 All cases will be considered on their merits.

3. Home Seekers under the age of 18

- 3.1 Home seekers must be aged 16 years or over to apply to join the housing register but those home seekers under the age of 18 may be subject to locally agreed protocols which will determine the type of property and support services required for them to be considered for accommodation.
- 3.2 Home seekers aged 16 and 17 looking for social housing in North West Leicestershire must provide details of a guarantor and/or a person to hold the tenancy in trust to be allowed onto and remain on the register. The guarantor/trustee must be a responsible person such as a parent or other close family member, or a representative from a support agency, such as Social Services.
- 3.3 Subject to 3.4 home seekers aged 16 and 17 will be assessed in the same way as all other home seekers joining the housing register.
- 3.4 When an application is received from a homeless home seeker aged 16 or 17, North West Leicestershire District Council will in the first instance, seek to establish if accommodation should be provided under Section 20 of the Children Act 1989 and will request that Children and Young People's Services undertake a "child in need" assessment. If it is established that the child is not a "child in need" and other suitable accommodation cannot be secured through the Council's Homelessness Duties, the application will be assessed in the same way as all other home seekers joining the housing register
- 3.5 When an application is received from a lone parent under the age of 18, North West Leicestershire District Council will seek to carry out a joint assessment of needs and support with Social Services. The assessment will only be undertaken after the home seeker has given their consent.
- 3.6 Although under 18s are allowed on the housing register it is at each landlord's discretion if, and under which circumstances, they will rehouse home seekers under 18.
- 3.7 Six months before a young person's 18th birthday the Council will consider an application for accommodation from someone without a guarantor/trustee as per 3.2 but they may be overlooked for accommodation until their 18th birthday. All other qualification criteria will still apply.

4. Right to Review

- 4.1 Section 166A(9) of the 1996 Act includes a requirement for an allocation scheme to give home seekers a right to review a decision on qualification in s.160AZ(9), and to be informed of the decision on the review and the grounds for it. This is in addition to the existing right to review a decision on eligibility.
- 4.2 By virtue of s.160ZA (9) and (10) the Council must notify a home seeker in writing of any decision that he or she:
- is ineligible for an allocation of accommodation under s.160ZA (2) or (4), or
 - is not a qualifying person under s.160ZA (7)
- 4.3 The notification will give clear grounds for the decision based on the relevant facts of the case. Section 160ZA(10) provides that, where a notification is not received by the home seeker, it can be treated as having been given to him or her, if it is made available at the Council's office for a reasonable period.
- 4.4 If the Council considers that a home seeker may have difficulty in understanding the implications of a decision on ineligibility or disqualification, the Housing Choices Team will arrange for the information to be explained verbally in addition to providing a written notice.
- 4.5 Home seekers also have the right, on request, to be informed of any decision about the facts of their case which has been, or is likely to be, taken into account in considering whether to make an allocation to them (s.166A(9)(b)).
- 4.6 If a home seeker is successfully matched for a property but is refused the offer of accommodation by the Council or one of the Registered Provider partners, they should ask for a review of the decision. The Council and each partner Registered Provider operate their own appeals process. A member of the North West Leicestershire Housing Choices Team will be able to provide the home seeker with a copy of the relevant review procedure.
- 4.7 Under s.166A(9)(c) home seekers have the right to request a review of any of the decisions mentioned in paragraphs 4.2, 4.5 and 4.6 above and to be informed of the decision of the review and the grounds for it. Home seekers wanting to exercise a right to review, or someone appointed by them to act on their behalf, should submit a request, preferably in writing within 21 days of the original decision letter to:

Housing Choices Team Leader
North West Leicestershire District Council
PO Box 11051
Coalville
LE67 0FW

Requests should indicate the reasons why a request for a review is being submitted and any points that the authority is requested to take into account, and the details of any representative they have appointed. Where a home seeker is unable to provide a written submission, verbal representations will also be accepted.

- 4.8 The officer considering the review will not have been involved in the original decision. The review will take account of the allocation scheme, the relevant legislation and guidance, any information provided by the home seeker or his/her representative and any other relevant circumstances.

Reviews will be completed within 15 working days of the application being received.

- 4.9 If the home seeker is not satisfied with the outcome of the review they can ask for their case to be considered by a more senior officer. A request for a second tier review should be made within 15 working days of the date on the review decision letter.

- 4.10 Any reviewing officer will not have been involved previously in the case and will normally carry out the further review within 40 working days of the request. A written notification of the decision, including grounds for the decision, will be sent to the home seeker.

- 4.11 If the home seeker is not satisfied with the outcome of the second tier review, he/she may challenge the decision in the High Court on a point of law. The home seeker has three months from the date of the decision letter to apply.

- 4.12 All correspondence will be sent to the mailing or email address on the home seeker's application as per their correspondence preference.

5. Home Seekers with Mobility Needs

- 5.1 If a home seeker indicates on their registration form that they have a mobility need, then they will be asked to complete a set of questions to determine the, the type of property that would be suitable and any adaptation that would be required to the property.
- 5.2 The mobility needs assessment will be used to assess what the home seekers housing needs are and what property types they will have access to and preference for. Where necessary professional help will be sought in order to accurately assess how the individual's mobility issue affects their housing need.
- 5.3 North West Leicestershire District Council will advertise vacancies as they become available. This includes those properties that are suitable for the needs of home seekers with mobility problems, or those that have been specially adapted in some way. North West Leicestershire District Council will include information on the level of adaptations and/or accessibility features within the property advertisement.
- 5.4 Properties that are suitable for home seekers with mobility problems will be clearly advertised with details of any adaptations or special facilities to allow home seekers to bid for properties that will meet their needs.
- 5.5 The Council will aim to make best use of the available housing by matching property characteristics to a household's needs and circumstances.

Where preference is to given to home seekers with a mobility need such as in the case of level access properties then this will be clearly stated on the advert.

Where a property is particularly suitable to meet a specific mobility need or could be easily adapted to do so, the decision may be taken to allocate the property through a management allocation (according to the process described in section 11). Home seekers will be selected on the basis of their mobility needs assessment. Management allocations will be restricted to situations where a home seeker has very specific needs which are unlikely to be met through the choice based system.

- 5.6 Where a home seeker is unsure as to whether a property would meet their housing need or whether it might be suitable for adaptations they should contact the landlord of the property to inform their decision to bid before the bidding cycle ends.

6. Household Eligibility

- 6.1 Individual landlords have some discretion to set their own eligibility criteria. These will be set out clearly within the advert. By logging in to the Choice Based Lettings system applicants will see the current adverts they are eligible for. If a home seeker thinks that they are unable to bid for properties they believe they should be eligible for, they should contact the Housing Choice Team within the relevant bidding cycle. Where an applicant is bidding for a property that would result in under occupying in terms of benefit regulations they may be overlooked on affordability criteria.

Household Definitions - Guidance

- 6.2 A household is the group of people that would normally be expected to live together. It will often comprise people with caring responsibilities such as a parent, or someone with parental responsibility and children or adults who have demonstrated a long-term commitment to living together whether as a couple or other family unit. The purpose of the allocations policy is to house households into suitable accommodation that meets their needs. Moving another person into an existing home will not automatically make them a household member and in some circumstances to address housing need they may be expected to apply for accommodation in their own right. Equally, where an applicant expresses a wish to be rehoused with someone they are not currently residing with they will be expected to demonstrate the nature of their long term commitment to living together.
- 6.3 Where a parent has overnight access to their children, an additional bedroom need may be awarded to allow the children to sleep over. Households falling into this category must provide evidence that they have access to the children and provide at least 2 nights of secondary care on a regular basis.

The following conditions apply:

- a. This will normally entitle a household to a single additional bedroom regardless of the number of children to whom the home seeker has access.
- b. A household will not normally be afforded a priority for being a bedroom short except where the current accommodation is a bedsit/studio.
- c. For the purposes of this section a child is considered to be any young person under the age of 18.
- d. An additional bedroom will only be allowed for a household which would be overcrowded when additional children are staying following the rules on bedroom requirements set out in Section 6.14 and 6.15. Those that could be accommodated within the existing household will not generate an entitlement to an additional bedroom.

- e. In cases of a shared residency agreement including a joint residence order, the Council reserves the right to determine a primary carer for housing purposes. Only the primary carer would be entitled to the full bedroom eligibility for the household. When making this decision the Council will follow the same decision process as that used for determining the main responsibility for benefits purposes.
 - f. Single person households or couples with access to children cannot normally be considered for properties larger than a two-bedroom property irrespective of the number of children they have access to.
 - g. Individual landlords are able to apply their own policies with regard to the size or type of properties that will be available to home seekers awarded an additional bedroom need due to overnight access. The relevant eligibility criteria will be listed on the property advert.
- 6.4 Accommodation designated for older home seekers will be advertised with a minimum age criteria dependent upon the landlord's policy, and properties will be advertised accordingly, indicating any additional services that are available (if any). Where joint home seekers are bidding for this type of property, only one home seeker normally needs to meet the minimum age criteria stated on the advert.
- 6.5 A single parent household is entitled to the same size accommodation as a two-parent household with the same number of children.
- 6.6 A child must spend a minimum of four nights per week with the home seeker in order for them to be classed a permanent resident. Exceptions will be considered, for example in circumstances where the child resides away from the home seeker on a temporary basis but their permanent home is with the home seeker.
- 6.7 A home seeker may add a joint applicant to their housing application. Checks will be made to ensure that joint home seekers added are eligible to join and become a tenant. The home seeker's application will be re-assessed based on the combined circumstances of all household members and they will be notified of any changes, for example a change in their housing need band.
- 6.8 A home seeker may add additional household members to their application. Checks will be made to verify their identity, circumstances and confirm their housing history. Where an adult is added to an application the Council will carry out checks to confirm that there are no impacts on qualification.
- 6.9 A joint home seeker may wish to be removed from the existing application and apply separately in their own name. In such circumstances, the home seeker's new application will be backdated to the date they joined the original joint application.

- 6.10 In exceptional circumstances home seekers may be allowed to bid on properties they would not normally be eligible for. In making this decision North West Leicestershire's Choice Based Lettings scheme will consider the needs of each household and the needs of each landlord to make best use of their housing stock.

Supported, Sheltered Housing and Extra Care

- 6.11 Home seekers will need to satisfy the advertised age rules for the scheme and/or be assessed as having a support need that can be met within supported or sheltered housing.
- 6.12 Home seekers with assessed support needs will be eligible to bid for properties where support is provided or in some cases in general needs accommodation where alternative support arrangements can be put in place. Where a home seeker has bid for supported accommodation, it is expected that they will engage with this support to ensure they are able to maintain their tenancy. Home seekers who are allowed onto the housing register because of a need for sheltered or supported housing who would otherwise not be eligible for the register will only be allowed to bid for suitable supported accommodation. The offer of supported accommodation may be subject to a Social Care Assessment.
- 6.13 In applying this policy it is recognised that there will be circumstances where a household's accommodation needs and support needs will need to be met separately. The priority of this policy is to meet a home seeker's accommodation needs. The Housing Choices Team will, where appropriate, work with relevant agencies to help a home seeker meet their support needs.

Defining Bedroom Requirements

- 6.14 The Council's policy on bedroom need is based on the Housing Benefit rules on bedroom eligibility. This is to ensure that issues of affordability are avoided.

The following rules are used to determine the minimum size of accommodation needed by a household:-

A separate bedroom is normally needed for each of the following:

- Every adult couple or single parent
 - Any other person aged 16 years or over
 - Any two children aged under 16 years of the same sex
 - Any two children aged under 10 years regardless of sex
 - Any other child
- 6.15 Normally to be included in the household a person needs to be living with you all the time. If someone is away from home, they still count as living with you if:
- they intend to return to live with you
 - you haven't sublet their room

- if they are in the UK, they are not likely to be away for more than 13 weeks
- if they are outside the UK, they are not likely to be away for more than four weeks

If they're away for up to a year, they can still count as living with you if they both:

- intend to come home
- are in hospital, or away studying or training are an adult child who is serving away from home in the Armed Forces.

Medical need for an extra bedroom

6.16 A additional bedroom may be awarded in the following circumstances:

A member of the household has a disability or medical reason that means they are unable to share a bedroom. Behavioral issues can be included as long as they can be evidenced.

A home seeker has a non-resident carer (or group of carers) providing regular overnight care to themselves or a disabled household member.

When considering whether an extra bedroom is needed the Council will take into consideration:

- Whether the household receives or would be likely to receive an additional bedroom entitlement for housing costs purposes as part of a benefit claim
- Proof of need and receipt of overnight care
- Any assessment made by a medical or care professional that supports the fact the person cannot share a bedroom.

6.17 In assessing any bedroom shortage in a household's existing accommodation, the best fit according to these rules will be taken, even if that is different to the pattern of occupation of the existing accommodation.

6.18 Rooms that would normally be expected to be used as a bedroom but are in use for other purposes will also be included in the calculation. An exception will be where a home seeker does not have sole occupancy of the property and does not have control over the use ,of the rooms.

6.19 Home seekers awarded preference based on having a bedroom shortage or surplus may be restricted from bidding for a property of the same bedroom size as currently occupied. Where a household in these circumstances wishes to bid for a property of the same size they will have their banding amended as though they were adequately housed.

- 6.20 Large families (i.e. those with five or more children) may be given additional priority over smaller households for larger properties such as those with four or more bedrooms.
- 6.21 Foster carers are entitled to an additional bedroom as long as they have fostered a child or become an approved carer in the last 12 months. Prospective foster carers will be considered, on evidence that Children's Services will approve the home seeker as a foster carer subject to availability of suitable size accommodation.
- 6.22 For the purposes of defining bedroom requirements, an unborn child will count as a child from within 6 months of the expected date of delivery. This will be calculated by taking the estimated due date provided by the health service rolled back by 6 calendar months. Home seekers are required to provide proof of birth within 6 months to retain their bedroom entitlement. Landlords retain the right to withdraw an offer should the property be unaffordable to the home seeker at the time of letting.
- 6.23 The same approach as detailed in section 6.22 above will be taken 6 months before each household member's birthday with regard to calculating bedroom eligibility.
- 6.24 A bedsit/studio flat will be deemed as having one bedroom suitable for single occupancy for eligibility and overcrowding purposes and so a single person living in a bedsit with no other issues will be placed in the low or potential band whereas a couple in the same circumstances will be deemed one bedroom short.

7. Assessing Housing Need

- 7.1 Whilst offering choice, North West Leicestershire's Choice Based Lettings scheme must take into consideration the housing needs of each home seeker and their household to allow those home seekers in greatest need to be given greatest preference.
- 7.2 We will consider and assess the housing needs of each household. All home seekers who are eligible to join the housing register will be allocated one of five housing need bands by the Housing Choices Team, determined in accordance with their verified housing need. The five bands are as follows
- Critical Housing Need (highest)
 - Urgent Housing Need
 - Medium Housing Need
 - Low Housing Need
 - Potential Housing Need (lowest)
- 7.3 Home seekers must notify North West Leicestershire District Council immediately of any change in their housing circumstances. The Council may need to undertake further enquiries before reassessing the application. A home

seeker's application may move from one housing need band to another following the reassessment.

- 7.4 If a home seeker feels that their application has been assessed incorrectly, they have a right to request a review of the decision (see section 4).
- 7.5 Home seekers will normally be placed in the highest housing need category they qualify for except in the case of Home seekers who fall into the categories outlined in 9.7 or who have been allowed onto the register without a local connection under 9.6. Home seekers to whom the Council has accepted a duty under the homelessness legislation will be dealt with as set out in section 7.26. This approach compliments the band categories as set out below.

Band 1 – Critical Housing Need

- 7.6 Home seekers who have been assessed as having an emergency need to move (see 9.27 onwards) will be placed in the critical housing need band. Home seekers can remain in the critical housing need band for a period of up to 8 weeks. If no suitable properties have become available during the 8 week period, or the home seeker has not been successful in their search for accommodation their application will be reviewed. In exceptional circumstances home seekers may be granted an extension, the length of which will be determined by the Housing Choices Team Leader.
- 7.7 Home seekers in the critical housing need band retain the right to bid for properties of their choice. However, if they fail to use all of their opportunities to bid in any cycle within the critical period the Housing Choices Team reserves the right to place bids for the home seeker on suitable properties that meet their housing need. The time by which the Home Seeker is expected to have used their bids will be agreed in advance with the Home Seeker. Home seekers will be expected to place bids on all suitable properties and consider all offers of suitable accommodation. Failure to bid for suitable properties or refusal of an offer of suitable accommodation may result in the priority not being renewed at the end of the eight-week period. Furthermore, at the end of the eight-week period they may be considered to have deliberately worsened their own circumstances and placed in a lower band.
- 7.8 Critical need to move will be recognised in the case of:-**
- a) **Emergency Welfare need** – circumstances could include (this is not an exhaustive list)
- Home seekers who are subject to severe harassment, threats of violence or actual violence, or threats of physical, emotional, or sexual abuse.

- Home seekers living in a property where the conditions are classed as unsafe or risk of imminent harm that cannot be remedied within a reasonable time (not resulting from damage caused by the home seeker).
 - Home seekers living in a property that is statutorily overcrowded
 - Young people leaving Care. The home seeker will have been through their housing options with the Council and all other options will have been exhausted.
- b) **Emergency Medical need** – circumstances could include a home seeker with a progressive or chronic medical condition combined with other difficulties such as the need for adapted accommodation or the inability to be discharged from hospital to their current accommodation.
- c) **Complex Housing Needs-** Would include a number of high need factors which taken together create an urgent need to move. This could be, for example, a combination of severe physical and learning disabilities combined with stress caused by harassment.
- d) **Management need** – circumstances could include (this is not an exhaustive list)
- Tenants needing an emergency transfer because their current property is in need of urgent repair (includes demolition)
 - Those succeeding to a tenancy that is not suitable to their needs and who have lived in the property for at least the last 12 months.
 - Home seekers who have no right in law to remain in their current Council or Registered Provider accommodation, i.e. they have no right of succession but the home seeker has lived in the property for at least the last 12 months.
 - Tenants occupying a wheelchair adapted property they no longer need which is required for another home seeker.
 - Other urgent need to move.
- e) **Displaced agricultural workers** - who qualify for assistance under the Rent (Ag) Act 1976

Band 2 – Urgent Housing Need

7.9 **Two or more needs from the following Medium housing need band sections** - A home seeker will be assessed as Urgent need if the home

seeker has been assessed as having two or more needs from the following sections of the Medium housing need band AND these needs do not have the same underlying cause, for example where damp could be considered poor housing conditions but also is likely to lead to medical issues. No more than **one** factor to be taken from **each** of the following sections:

- Poor housing conditions
- Medical need to move
- Welfare need to move
- Overcrowded Housing

Please note that insecure accommodation is not included in the list above.

- 7.10 **Home seekers where there is overcrowding by two or more bedrooms short of the assessed need** - (the home seeker would not normally be considered eligible to bid for the same size property as currently occupied unless their banding is altered to reflect that fact).
- 7.11 **A home seeker who is living in supported accommodation and the Council has a move on agreement with the housing provider** and their key worker and the Council has agreed that independent accommodation would now be appropriate. The Council may require the key worker to provide a “ready to move assessment,” to support their recommendation.
- 7.12 **A home seeker who is living in Residential Care type accommodation where their current needs no longer require such accommodation** and all necessary agencies are in agreement that independent accommodation could be suitable with necessary support **and** such support will be available.
- 7.13 **Social Tenants within the Local Authority area who are under-occupying a home which is in high demand from other home seekers and/or where there is assistance available from a local Tenants’ Incentive Scheme** - (the home seeker would not be considered eligible to bid for the same size property as currently occupied).
- 7.14 **Home seekers who require adaptations that cannot be economically and/or technically achieved in their existing accommodation.** Home seekers who require adaptations beyond level access accommodation where this cannot be economically and/or technically achieved in their existing accommodation, or that fall outside of the policy of their landlord and/or the DFG criteria, will be placed in the Urgent Band. In some circumstances such home seekers will be identified for a direct match to accommodation which is adapted or particularly suitable for the appropriate adaptations.
- 7.15 Home seekers in the Urgent housing need band can remain in this band for up to 26 weeks. If no suitable properties become available during the period, or the home seeker has not been successful in their search for accommodation, their application will be reviewed. In exceptional circumstances, home seekers

can be granted an extension up to a further 16 weeks to remain in the Urgent band. The Housing Choices Team Leader will determine the length of any extension, taking into account a range of factors such as the previous availability of suitable properties and the home seeker's bidding history.

- 7.16 Home seekers in the Urgent housing need band retain the right to respond to properties of their choice. Home seekers will be expected to consider all suitable properties. Failure to bid for suitable properties or refusal of an offer of suitable accommodation will be taken into account if the application is reviewed at the end of the six-month period. If suitable accommodation had been available within this period, the applicant may be considered as having deliberately worsened their own circumstances and placed in low band.
- 7.17 Any applicant that does not have their band extended will be provided with an explanation of why the decision has been made including which properties they would have been expected to bid for. They will be able to request a review of the decision by writing to the Housing Choices Team Leader.

Home seekers who have been given preference due to need for a different sized property may be restricted to bid on properties that meet their needs. Preference will not be applied to home seekers who bid on properties of the same size.

Band 3 – Medium Housing Need

- 7.18 **Poor housing conditions** – home seekers living in unsanitary, or unsatisfactory housing conditions. This could include:
- a) **Housing that is not in a reasonable state of repair** - Housing failing on this point will be those where **one or more key building components** are old, in a poor condition and in need of major repair or replacement. This means external walls, roof, external windows/doors, chimneys, central heating boilers, gas fires, storage heaters, plumbing and electrics. Where there is evidence that disrepair is a result of tenant damage, additional preference will not be awarded. When making this assessment consideration will be given to individual circumstances, such as whether the damage was caused by an ex-partner or other former family member.
 - b) **Housing that does not have reasonably modern facilities and services**
-
Dwellings failing on this point are those that lack **three** or more of the following:
 - a reasonably modern kitchen
 - a kitchen with adequate space and layout

- a reasonably modern bathroom
 - an appropriately located bathroom and WC
 - adequate noise insulation (where external noise/neighbourhood noise is a problem)
 - adequate size and layout of common areas for blocks of flats
- c) **Housing that does not provide a reasonable degree of warmth** - Housing that does not have a heating system or other means of heating the property or the heating system at the property does not work or is in poor condition will fail this point.
- d) **Other poor housing conditions** - In exceptional circumstances, other poor housing conditions will be considered where there is evidence that the housing conditions are having a detrimental effect upon the welfare or health of the household, an example could be mould and damp within the property.

[These criteria will be assessed in partnership with Environmental Health services. Where a home is found lacking in relation to these standards, the Environmental Health Officer will consider using the powers available to ensure that the property owner is made to meet acceptable standards. Where it is expected that the disrepair can be remedied in a reasonable time period priority may not be given unless there are unnecessary delays].

7.19 Medical need to move – home seekers with a medical, disability or mobility problem. This could include:

- Verified high medical need where the home seeker's condition is currently, directly affected by their accommodation and a move to alternative accommodation (which they are assessed as eligible to bid for) would resolve or ease their medical condition. Medical need to move is unlikely to be granted where the current property is deemed suitable for the home seekers medical needs.
- Level access accommodation is required and there is no prospect of adaptations to the home seeker's current property being made within 12 months. Suitable proof will be required i.e. confirmation from a local Occupational Therapist or landlord. The home seeker may be referred to local agencies for assistance with adaptations. The need for more complex adaptations may result in an award of Urgent Banding

7.20 Welfare need to move – this could include:

- a) Home seekers suffering from harassment or neighbour nuisance such as verbal abuse or damage to the property. The problems will have been reported to the landlord and/or the Police for action but despite co-operation and support from all parties a satisfactory conclusion not found. The

harassment is not at a level whereby the home seeker has an emergency need to move.

- b) Home seekers with a need to be near relatives to give or receive assessed care/support. This would only apply where NOT moving would cause physical, financial, or emotional hardship to either party.
- c) Home seekers with an evidenced need to move closer to specialist educational or similar organisation, agency, or institution. This would only apply where NOT moving would cause physical, financial, or emotional hardship to either party.
- d) Home seekers who need to move to access work. They will either have found permanent employment within the District and need to move closer to work to prevent financial hardship or they are unable to take up an offer of work because the workplace is not accessible from their current home. An assessment will be undertaken; this may involve contacting the home seeker's employer or other agencies such as Job Centre staff.
- e) Home seekers who are having difficulty in meeting their housing costs due to financial hardship caused by reasons outside of their control. This could include:
 - Inability to meet housing costs in the private sector due to restrictions in LHA rates where the home is a suitable size
 - Being ineligible for housing benefits due to age
- f) Home seekers who are required to share facilities with people who are not part of their household. This will only apply to households with dependent children or where the home seeker or a member of their household is considered vulnerable for another reason.

Home seekers who have been given preference because they have been assessed as meeting the criteria in categories 9.20 (b), (c) or (d) above, may be restricted to bidding for homes advertised in the areas they have demonstrated a need to move to].

Home seekers who have been given preference under 9.20 (e) will still be required to demonstrate that any accommodation offered is affordable.

7.21 Overcrowded housing - This means a household that is one bedroom short of the assessed need for that household.

Home seekers who have been given preference due to need for a different sized property may be restricted to bid on properties that meet their needs. Preference will not be applied to home seekers who bid on properties of the same size.

7.22 Insecure accommodation – this would include:

- a) Home seekers who currently rent accommodation privately on an assured shorthold tenancy or a tied tenancy and have been served with a valid notice to leave.
- b) Home seekers accommodated as a licensee/lodger; or
- c) Home seekers living with family, relatives or friends
- d) Social tenants who have a fixed term tenancy and have been served notice that this will not be renewed, providing they still qualify for the housing register.

Band 4 - Low Housing Need

7.23 Applications will be accepted onto the housing register and considered in low housing need if:

- The home seeker has been guilty of behaviour within the last 12 months that affects their suitability to be a tenant. The behaviour is not serious enough that enforcement action would normally have been taken and does not warrant exclusion from the housing register on the basis that they do not qualify for social housing. This relates to not only the home seeker, but also other members of their household. The home seeker will usually remain in the Low Band for at least 12 months. If there is a relevant change in the household's circumstances during the 12-month period the home seeker may contact the Housing Choices Team to request that their priority is re-assessed. Otherwise, the home seeker will remain in Low Band for twelve months following which the home seeker will be able to request a reassessment of their housing need band.
- The Home seeker would otherwise be excluded from the housing register as a result of suitability to be a tenant but have been accepted onto the housing register due to an overriding housing need.
- Home seekers who have deliberately worsened their circumstances to gain an unfair advantage over other home seekers on the housing register may be placed in the Low housing need band for a period of 12 months. This will normally include households who have been found to be intentionally homeless. The application will then be reassessed. If there is a relevant change in the household's circumstances during the 12-month period the home seeker may contact the Housing Choices Team to request that their banding is re-assessed. Home seekers may be considered to have deliberately worsened their circumstances if they have

been placed in higher bands but not taken the opportunity to bid for more suitable properties during the fixed period awarded.

- The home seeker is a social tenant who accepted a property knowing that it did not fully meet their needs and whose circumstances have not changed significantly.

7.24 Private Rented Sector Tenants who are adequately housed, who are not subject to a notice and do not have a welfare, medical or other additional need for alternative housing.

Band 5 - Potential Housing Need

7.25 Applications will be accepted but normally given no preference if:

- The applicant is in private rented accommodation and has full security of tenure at least comparable to a full assured or secure tenancy and no welfare or medical need to move.
- The home seeker is a social tenant whose current accommodation is the correct size for them (as defined in section 6.14) and who does not have a welfare, medical or other exceptional need to move.
- The home seeker is seeking to access affordable home ownership schemes only.
- The home seeker has been allowed onto the housing register as they may be suitable for older persons or hard to let accommodation but otherwise would not meet the qualifying criteria. This includes homeowners who have an existing property that is available, suitable and affordable or they can meet their needs within the market
- The home seeker is not considered suitable for general needs accommodation but may be suitable for specialist accommodation subject to an allocation. (an applicant's ability to bid through Choice Based Lettings may be restricted whilst placed in this band).

Homeless Households

7.26 The following section applies to homeless households where the Council has accepted a duty under the homelessness legislation.

7.27 A homeless household will still need to meet the qualification criteria for the housing register.

7.28 Where the Council has accepted a homeless duty and has decided or has reason to believe the home seeker is in priority need and unintentionally

homeless and therefore would be owed a main homeless duty the home seeker will be placed in Band 1 – Critical Housing Need for a period of up to 56 days.

- 7.29 If a decision is made during the relief duty that the main homeless duty will not be owed then the application will be reviewed and placed in the appropriate band according to the criteria below.
- 7.30 Upon reaching 56 days in Band 1 – Critical Housing Need, the application will be reviewed. If it is felt on review that the home seeker has:
- (a) not bid on all properties that are suitable during this period, or
 - (b) has not made sufficient endeavours to secure an offer of accommodation
- Then the application will be moved into Band 2- Urgent Housing
- 7.31 The home seeker will continue in Band 2 – Urgent Housing until such time as:
- (a) They accept an offer of accommodation
 - (b) The prevention duty is ended and no relief duty is owed
 - (b) The relief duty is ended
 - (c) 56 days have passed
- 7.32 If a home seeker is found to be owed a main homeless duty then the application will be moved to Band 3 – Medium need and a direct qualifying homelessness offer will be made.
- 7.33 Where the Council has accepted a homeless duty but the home seeker does not qualify for Band 1 – Critical Housing need as per section 7.29 will be placed in Band 2 – Urgent Housing Need for up to 56 days (subject to not falling under the criteria in section 7.35 below).
- 7.34 The home seeker will continue in Band 2 – Urgent Housing until such time as:
- (a) They accept an offer of accommodation
 - (b) The prevention duty is ended and no relief duty is owed
 - (b) The relief duty is ended
 - (c) 56 days have passed
- 7.35 Upon reaching 56 days in Band 2 – Urgent Housing Need the application will be reviewed. If it is felt on review that the home seeker has:
- (a) not bid on all properties that are suitable during this period, or
 - (b) has not made sufficient endeavours to secure an offer of accommodation
- Then the application will be moved into Band 3- Medium Housing Need
- 7.36 If a home seeker reaches the end of the relief duty and no main homeless duty is owed then their application will be placed in Band 3 – Medium Housing Need (subject to not falling under the criteria in 7.37 below).
- 7.37 A homeless home seeker will still be placed in the low band where their behaviour including in relation to their bidding activity, meets the necessary criteria

Moving between housing need bands

- 7.38 A home seeker's housing need band will change if their level of need changes (see 9.4).
- 7.39 When a home seeker moves up to a higher housing need band their effective date will change to the date they moved in to the higher band.
- 7.40 Home seekers who move to a lower housing need band will retain their current effective date **or** the date they were previously in that housing need band.
- 7.41 Where it is determined on review that the home seeker should have been placed in a higher housing need band, they will retain their existing effective date rather than be awarded the higher priority from the review decision date. Where a review introduced new information not available to the original assessor, the reviewing officer will make a judgement as to the appropriate effective date.
- 7.42 Where a home seeker has been placed in the low band due to deliberately worsening their own circumstances this will normally be reviewed after a period of 12 months, however if there has been a significant change of circumstances then this review may take place earlier.

Additional Preference for Armed Forces and former service personnel

- 7.43 The following groups will be awarded additional preference within their allocated banding by receiving an additional 3 months waiting time to their band start date.
- those serving in the regular forces and suffering from a serious injury, illness or disability which is attributable (wholly or partly) to the person's service,
 - those who formerly served in the regular forces,
 - those who have recently ceased, or will cease to be entitled, to reside in accommodation provided by the Ministry of Defence following the death of that person's spouse or civil partner who has served in the regular forces and whose death was attributable (wholly or partly) to that service,
 - those serving, or who have served in the reserve forces and are suffering from a serious injury, illness or disability which is attributable (wholly or partly) to their service.

8. Advertising Properties

- 8.1 The Council will advertise between 90-100% of all empty Council properties through North West Leicestershire's Choice Based Lettings scheme and through the operation of an agreed Service Level Agreement, will encourage partner landlords to advertise the same percentage of their empty homes. The advert will contain basic information about the property and the eligibility criteria that home seekers must meet.
- 8.2 Property adverts may be restricted to receiving bids from or giving preference to certain types of home seeker, for instance, where a local lettings policy has been agreed, or the homes advertised form part of a new development that is subject to letting criteria set out in a section 106 agreement. For example, property adverts may be restricted to home seekers by:
- Support needs (i.e. Sheltered, Extra Care and Supported)
 - Banding
 - Home Seeker Age
 - Mobility
 - Household type and size
 - Local Connection
 - Economic Status
- 8.3 (this list is not exhaustive and policies will be adapted to meet the circumstances of the estate/development)
- 8.4 Partner landlords may introduce their own additional criteria for properties. Where this is the case these will be clearly shown on the advert.
- 8.5 Home seekers will be able to view the weekly property adverts online will be able to request support from the Housing Choices Team in order to review and bid on properties.
- 8.6 The property listings **may** include details of other affordable housing options in the District. This may include private rented properties, low cost home ownership and Homebuy options.

9 Local Lettings Policies

- 9.1 From time to time the Council or its partners may introduce a local lettings policy for a specific area or development in order to address local issues or ensure a balanced community. For example a local lettings plan may have regard to the following considerations:
- Providing a mix of household sizes and types in order to provide community stability
 - Reducing the likelihood of anti-social-behaviour in areas that have existing high levels of anti-social behaviour.
 - Strong local demand

- The protection of vulnerable communities
- 9.2 Local Lettings Policies should have consideration for the objectives within the introduction to the Allocations and Lettings Policy and the guidelines set out in Appendix One. They should:
- Be developed with a clear objective in mind
 - Cover the smallest geography required to meet the objective.
 - Be time limited or subject to review.
- 9.3 Where a local lettings policy applies this will be clearly marked on the advert and a copy of the policy or link to the policy will be made available on the Choice Based Lettings website. As far as possible the shortlisting criteria will reflect the conditions of the local lettings policy allowing a home seeker to make informed choices.
- 9.4 For some specialist schemes the local lettings policy may allow for allocations/nominations outside of the Choice Based Lettings scheme. This will be clearly marked within the Local Lettings Policy.

10. Bidding for Vacant Properties

- 10.1 Home seekers are responsible for bidding for properties that are advertised. Bidding **does not** involve pledging any money, it is simply the term used for expressing an interest in a property. If a home seeker is unable to search and bid for properties they will be assisted by a member of the North West Leicestershire Housing Choices team (see 10.5).
- 10.2 Home seekers are responsible for ensuring that they place bids in response to property adverts before the stated closing date. Requests for bids to be made after the closing date **will not** be considered.
- 10.3 Home seekers can currently place up to 2 bids per advertising cycle. Home seekers can cancel bids and place them on other advertised properties at any time during the bidding period. Home seekers will be informed of their position in the short-list at the time of bidding. If a property that a homeseeker has placed a bid on is withdrawn the applicant will be notified as soon as possible and they will have the chance to place the cancelled bid on an alternative property subject to eligibility.
- 10.4 Whilst home seekers are not normally penalised if they fail to respond to properties advertised, home seekers in Critical and Urgent housing bands will be expected to consider **all** suitable properties.
- 10.5 North West Leicestershire District Council retains the right to discharge the authority's statutory main homeless duty by making one suitable offer of accommodation to the homeless home seeker as described in sections 7.27 to 7.35.
- 10.6 North West Leicestershire District Council reserves the right to change the frequency of advertisements, for example due to the Christmas holiday period.
- 10.7 Once an applicant has provisionally accepted an offer of accommodation their application will be suspended and they will not be able to bid on further properties as they are advertised. Once a provisional offer of accommodation has been accepted applicants will normally be overlooked for other properties they have already bid on, however if a landlord becomes aware that the expected availability of the property will be significantly delayed landlords should try to contact the applicant to ask if they would like to continue to bid.
- 10.8 In the case of homeless households any proposals to amend offers due to property availability will be discussed with the Case Officer who may then discuss the implications of not agreeing to an earlier property with the applicant
- 10.9 The Council may make a direct offer or place bids on behalf of homeless households where this could prevent or relieve homelessness or meet the Council's main homeless duty to secure accommodation. In this situation the Council will still have regard to the accepted criteria on suitability of

accommodation. Where the Housing Choices Team intends to make a bid on behalf of a homeless household reasonable attempts will be made to inform the home seeker in advance. Wherever possible the home seeker will be given the opportunity to bid for properties themselves, however an inability to contact the home seeker will not restrict the ability of the Housing Choices Team to place bids on their behalf. The home seeker will not be able to withdraw any bids made on their behalf.

11. Direct offers and Management Allocations

- 11.1 North West Leicestershire Choice Based Lettings scheme aims to give all home seekers choice in where they live. In exceptional circumstances, it may not be possible to offer the home seeker choice and a direct offer of accommodation, or a Management Allocation, may have to be made.
- 11.2 A Direct Match or Management Allocation may be made in one of the following circumstances (this list is not exhaustive)
- When a Council tenant or tenant of a Registered Provider partner needs to be decanted from their property because it requires major refurbishment or repair or is identified for demolition
 - Where a property has been compulsorily purchased and there is a legal requirement to offer the household a specific property
 - Where the home seeker could pose a risk to individuals or other members of the community
 - Where the Council or Registered Provider partner has decided that this is the best use of stock.
 - Where a home seeker has particular accommodation needs such as mobility requirements that are not likely to be met through the Choice Based Lettings process
 - Where a homeless household is occupying a property as temporary accommodation that would be suitable to meet their long term accommodation needs
 - Where a homeless household is owed the full housing duty
- 11.3 Properties to be allocated on a Management Allocation basis will not be advertised through the scheme but information on management allocations will be available to home seekers on the housing register via the Choice Based Lettings website.

12. Difficult to let Properties

- 12.1 The term 'difficult to let' usually refers to properties that have been advertised twice but have not attracted any eligible bids.
- 12.2 If a particular property type has a history of falling within the difficult to let definition, the Council or Registered Provider may alter the eligibility criteria on the next advert to encourage home seekers of a different age or household type to bid. The Council will work with all social housing providers to identify and encourage home seekers who would meet the revised criteria to bid. Alternative advertising methods may then be considered and a management allocation made to someone who expresses an interest in and is eligible for the property.
- 12.3 If the property still remains vacant, then following consultation, consideration should be given to other changes in the eligibility criteria and incentives to attract prospective tenants.

13. Short Listing Criteria

- 13.1 For all properties advertised, unless they are advertised on a "best fit basis" home seekers who have placed bids and meet the criteria for that property will be short listed in the following order:

- i) By housing need band (Critical to Potential)
- ii) By effective date (=date of registration or more recent date of change of priority)

If two or more home seekers from the same housing need band respond to a property advert, the home seeker who has been in the housing need band for the longest period will be matched first. If both joined the housing need band on the same date the home seeker who has been on the housing register the longest will be matched first.

- 13.2 In the event of two home seekers with the same registration date applying for the same property, North West Leicestershire housing allocations staff will make a decision between both cases taking into consideration the housing circumstances of each case.
- 13.3 This will generally mean home seekers who receive no preference (potential housing need band) are less likely to receive an offer of accommodation.
- 13.4 Non standard properties, including those that are suitable for those with mobility needs including wheelchair users may be advertised on a 'best fit' basis and preference given to home seekers who have been identified as requiring accessible accommodation. Home seekers will be selected based on the level of adaptation they require and the suitability, if available, of accommodation to meet their needs. These properties may be exempt from the short listing process outlined in 15.1. In some circumstances these properties will be directly matched to an applicant.

13.5 Shortlisting will be carried out in accordance with the policies and criteria of the Council's Housing Management Team or the relevant Registered Provider a copy of which will be available on the Choice Based Lettings Website or by request to the relevant organisation.

13.6 Where there is a shortage of accessible properties, and a failure to adapt a property would lead to unreasonable delays in housing for a disabled person then North West Leicestershire Housing staff will take steps to identify properties which are suitable to be adapted, and consider a management allocation.

14. Offering a property

14.1 The short listing results for each property will be sent to or accessed directly by the relevant social landlord. They will be responsible for contacting home seekers who have matched for the property and for allocating the property in accordance with their individual Allocations Policy. The Council and participating Registered Providers will work from the short list results provided by North West Leicestershire Housing Choices scheme.

14.2 Home seekers who are contacted regarding a property may be asked to provide proof to confirm the circumstances detailed on their North West Leicestershire Choice Based Lettings housing application form are correct.

14.3 Home seekers who owe a housing related debt to the Council or a Registered Provider will be advised that any offer of accommodation is subject to the remainder of the debt being paid in full. Home seekers may be asked to provide evidence to prove the debt has been paid.

In exceptional circumstances the requirement to repay the debt in full may be deferred. Circumstances where this discretion may be applied include where:

- A move to alternative accommodation is necessary to avoid significant/exceptional financial hardship
- The home seekers housing circumstances are such that not offering alternative accommodation would result in an excessive burden to either the home seeker or other household members.

This will be at the discretion of the relevant Landlord.

14.4 If the home seeker is unable to provide proof of their circumstances or if their circumstances have changed to an extent that they are no longer eligible for the property or their banding no longer reflects their circumstances then an offer of a tenancy will not be made.

NB. In instances where the home seeker who has matched first for a property is not offered the property, the prospective landlord is required to provide a valid reason for not offering the property and this information should be available to the home seeker either through the choice based lettings website or on request.

The home seeker will have a right to review against the decision (see Section 4).

- 14.5 If the home seeker is able to provide the housing provider with the proof requested then the home seeker should be offered the tenancy of the property.
- 14.6 Where a home seeker is being considered for a property that is deemed larger than their needs for benefits purposes the home seeker may be asked to demonstrate how they will make up the shortfall. If a home seeker cannot provide sufficient assurances that a property will be affordable then an offer will not be made. It is not expected that Discretionary Housing Payments will be considered a suitable justification that a property is affordable. If a home seeker is successful in these circumstances and is rehoused into the property they will not normally be allowed to register for a move in the future based on affordability unless they can demonstrate a change of circumstances.
- 14.7 The housing provider will complete the tenancy agreement with the home seeker. This agreement is the formal contract between the landlord and home seeker, and sets out the details of the property, rental charged, the full names, and the start date of the tenancy.
- 14.8 Landlords will attempt to make contact with the Home Seeker through all means available however if a home seeker is not contactable or does not respond to messages within 48 hours then they may be overlooked for an offer of accommodation. Home Seekers are responsible for updating their contact details to assist with this process. Home Seekers should be given sufficient time to consider an offer of a tenancy. The home seeker will normally have up to 24 hours following a viewing to make a decision.
- 14.9 Home seekers who are identified as vulnerable maybe given longer to consider the offer of a tenancy. Examples of this will include home seekers who are currently in hospital or in some form of temporary accommodation, such as a hostel or refuge or shortly due for release from prison. A decision will be made by the individual landlord according to the circumstances of the home seeker.
- 14.10 Home seekers will not normally be penalised if they refuse the offer of a tenancy but home seekers who refuse, or fail to respond to three suitable offers of accommodation or fail to attend three arranged viewings will have their application suspended for up to six months. They will then be asked to attend an interview with a member of North West Leicestershire's Housing Choices Team. The interview will be used to discuss their housing needs and to offer advice about the type of properties available. Home seekers will be ineligible to make further bids until they have attended the interview.
- 14.11 Home seekers in the Critical need housing need band may jeopardise their status if they refuse a reasonable offer of a tenancy and their critical need status may not be renewed at the end of the initial 8 week period. In the case of "homeless" home seekers in critical or urgent housing need the refusal of an offer of accommodation may result in the Council ending its homeless duty. Homeless Home have a right of review of a decision of suitability of

accommodation through the legislation where a refusal may result in the Council discharging its duty. This will be set out in a formal offer the home seeker will have received.

- 14.12 Home seekers who are owed Prevention or Relief duties under the Homelessness Reduction Act may find those duties coming to an end if they refuse a reasonable offer of accommodation.
- 14.13 The Council and Registered Provider partners to the scheme reserve the right to withdraw any offer of accommodation. Offers will only be withdrawn when there is just cause. The Council or Registered Provider will explain why the offer has been withdrawn. The home seeker will have a right to review against the decision (see Section 4). Reasons to withdraw an offer can include circumstances where the home seekers existing property is in a poor state of repair due to their own actions or failure to rectify or report issues.

15. Joint tenants

- 15.1 Home seekers seeking a joint tenancy should have a joint North West Leicestershire Choice Based Lettings scheme application.
- 15.2 The partner landlords within North West Leicestershire Choice Based Lettings scheme encourage joint tenancies.
- 15.3 If one home seeker of a household is unable to join the register (because they are ineligible or non-qualifying), then a joint tenancy cannot be granted.
- 15.4 The partner landlords will consider offering a joint tenancy to household members who have long term commitments to the home, for example, when adults share accommodation as partners (including same sex partners), friends, or unpaid live-in carers.
- 15.5 When a joint tenant serves notice to quit, the partner landlords can, at their discretion, grant the remaining joint tenant a tenancy in their sole name. In exercising their discretion, the landlords will consider whether this is making best use of their stock. The former tenant may join the housing register as a new home seeker.
- 15.6 Where a household member is already a social housing tenant it is presumed that they will be a joint applicant.

16. Feedback information

- 16.1 North West Leicestershire Choice Based Lettings scheme seeks to provide every home seeker with feedback information on previous allocations. This helps home seekers to make informed choices when bidding for future properties based on past trends.

- 16.2 Information on previous allocations through the scheme and an individual home seekers bidding history will be available to view via the Choice Based Lettings website.
- 16.3 The feedback information will include details of the number of home seekers who placed bids for the property and the date of registration and banding of the successful home seeker.
- 16.4 Home seekers will also be able to see their position on the short list by using the website. Although the Council will seek to make the queue position as accurate as possible, there may be circumstances where queue positions will not fully reflect the actual shortlist. Wherever possible this will be highlighted in the advert.
- 16.5 North West Leicestershire Housing Choices Team will provide advice to all home seekers to help inform their bidding choices. The Housing Choices Team will seek to contact home seekers who have not bid for a property in the Critical, Urgent and Medium Need bands before their band or annual review date to ensure they understand how the scheme works and discuss their housing needs.

17. Agricultural workers and the Rent (Agriculture) Act 1976

- 17.1 Under the Rent (Agriculture) Act 1976 North West Leicestershire Choice Based Lettings scheme has a duty towards agricultural workers who are required to leave their tied accommodation.
- 17.2 When considering an application from a displaced agricultural worker North West Leicestershire Housing Choices Team will need to be satisfied that :-
- The property from which the worker is displaced is needed to accommodate another agricultural worker.
 - the farmer cannot provide suitable alternative accommodation for the displaced worker
 - To re-house the vacating worker would be in the interests of efficient agriculture.

All 3 conditions need to be satisfied.

- 17.3 If North West Leicestershire Housing Choices Team is satisfied that the case is substantiated the home seeker's application will be placed in the Critical housing need band
- 17.4 If the case has not been substantiated then North West Leicestershire Housing Choices Team will assess the application based on the home seekers other housing circumstances.

18. Definition of Local Connection

- 18.1 Home Seekers will normally only be accepted onto the housing register where they can demonstrate one or more connections to the District as defined below. Property adverts will identify any further local connection criteria that must also be met such as to a village or parish.
- 18.2 A local connection is established by a home seeker demonstrating one or more of the following:
- (a) They have normally resided in settled accommodation in the District for at least twelve months at the time of application
 - (b) they have lived in the District for three out of the last five years
 - (c) they, or a member of their household is employed on a permanent basis or a temporary contract running for a minimum of twelve months, within the District (confirmation will be required from the employer)
 - (d) They have parents (including Guardians), brothers, sisters, or adult children who have been living within the District for at least 5 years with whom they have an ongoing close relationship. The applicant will need to provide evidence to support this connection. Step equivalents will be allowed.
 - (e) They have children under 18 years of age for whom they are not the primary carer but where there are formal access arrangements in place and living closer to the child(ren) would be in the child(ren)'s best interest. The applicant will need to provide evidence to support this connection.
- 18.3 The following groups of people are exempt from the rules on local (District) connection, people with:
- (a) No local connection but are owed a relief duty under the homelessness legislation and the Council is not intending to make a local connection referral to another Local Authority.
 - (b) Armed Forces and former service personnel where the application is made within five years of discharge.
 - (c) Bereaved spouse/civil partners of members of the Armed Forces leaving services accommodation following the death of their spouse partner; or
 - (d) Serving or former members of the Reserve Forces suffering from a serious injury, medical condition or disability sustained (wholly or partly) as a result of their service
 - (e) divorced or separated spouses or civil partners of Service personnel who need to move out of accommodation provided by the Ministry of Defence where a move into the district enables them re-engage with family and support networks.
 - (f) Care Leavers who were accommodated by Leicestershire County Council where LCC owes them duties as a former relevant child regardless of the locality in which they were placed will be deemed to have a local connection to NWLDC. This local connection category will apply until the care leaver's 21st birthday or they are pursuing a course of education set out in their pathway plan, until that course of education is finished.
- 18.4 The following is not accepted as evidence of a local connection:
- Time spent in any prison or secure unit in the district

- Time spent in hospital in the district
 - Time spent in any institution such as a refuge or rehabilitation centre in the district
 - Time spent in any other accommodation that is not at the choice of the Home Seekers
- 18.5 Other special circumstances may exist, and all applications will be considered on their individual circumstances.
- 18.6 Where a home seeker has left the District to access specialist short-term accommodation they will normally be considered as maintaining a connection to the District. Where a home seeker has accessed specialist accommodation within the District they will normally be considered as having maintained their connection in their originating authority.
- 18.7 Settled accommodation is usually meant to mean accommodation where the home seeker has a security of tenure or residence in the medium to long term such as through a tenancy agreement or licence or through a connection to the person(s) providing the accommodation and their intentions when providing the accommodation, such as in the case of those living in a family home.
- 18.8 A connection made through employment in the District is dependent on the employment requiring the home seeker to spend time regularly at a place or places of work within the District.
- 18.7 **Town, Village or Parish Connection** - For some housing schemes there are planning restrictions requiring that vacancies should go in the first instance to people who have a connection with the town, village or parish. The detail of the planning restrictions may vary from District to District and local lettings policies may apply.
- 18.8 The factors used to determine a village or town connection **in North West Leicestershire** will normally be as follows, where the main home seeker or joint home seeker can answer 'yes' to any one of the following:-
- I have lived in the village for the last 12 months
 - I work permanently in the village (at least 15 hours a week)
 - I was born in the village or previously lived in the village for three years or more
 - I have close relatives who have lived in the village for at least three years (close relatives are defined as parents, children, siblings, grandparents, or grandchildren). Step equivalents will be allowed.
 - I need to move to the Parish to be close to a relative or other person in order to provide or receive significant amounts of care and support.

Home seekers should refer to the criteria set out in the property advert.

19. Complaints Procedure

19.1 Requests for service and the reporting of issues should first be made to the Housing Choices Team using the contact details provided.

19.2 In cases where you believe we have not taken the appropriate action or done something wrong then a formal complaint can be made using the Council's complaints procedure.

19.3 Information about the Council's complaints procedure and complaints policy can be found on the Council's website:

https://www.nwleics.gov.uk/complaints_comments_and_compliments

or by calling the customer services team on 01530 454545.

Appendix One: Eligibility for properties

Each landlord participating in the choice based lettings scheme may set their own eligibility criteria for individual properties taking account of a range of factors including:

- supply and demand of different property types and locations.
- Practical factors relating to the design and build of specific units
- Wider neighbourhood considerations
- Other facilities and services associated with the property

However, the broad principles the council will expect to be adhered to include:

- To ensure best use of stock in normal circumstances the Council would not expect an allocation that left a household under-occupying by more than one bedroom
- Furthermore, the Council would not expect an allocation to lead to a household being overcrowded except in the case of particularly large households for whom there is not sufficient large accommodation within the district or in other exceptional circumstances where a household has very specific needs for which there is not adequate sized accommodation.
- Bungalows and other level access accommodation would normally to be made available to and preference given to people with a mobility need or older people regardless of other support needs unless they form part of specialist provision such as a grouped sheltered scheme.
- Properties that are designed for people with support needs may be advertised specifically to people who have a requirement for support.
- Properties may be advertised with age criteria where there are management grounds to do so.

When using fixed term tenancies North West Leicestershire District Council expects partner landlords to have adopted a clear published tenancy policy. This policy should have regard to the North West Leicestershire Tenancy Strategy 2012.

Appendix Two - Affordability Calculations

A household exceeding either the income or the equity/savings thresholds in the following table will be considered as having the means to meet their own housing needs within the private sector¹. This figure will be reviewed annually.

Home seekers over the age of 60 who are applying only for sheltered or specialist supported accommodation are exempt from the affordability limits.

Household Type ²	Gross Income	Savings and equity
Single	£37,000	£20,000
Couple	£40,000	£20,000
Family with children	£58,000	£30,000

Equity and savings can include but are not limited to: shares; bonds; commercial property; residential property; property abroad and money apportioned through the proceeds of a divorce settlement, inheritance or any form of cash windfall.

The calculation of affordability will take into account:

- The availability of any equity
- Whether the home seeker would be eligible for a mortgage
- The supply and affordability of accommodation suitable for the home seekers specific needs on the private market for either sale or rent (for example where the home seeker requires specially adapted accommodation or supported housing)
- Whether adaptation of the existing property is a viable option
- The capital gained from the sale of any property within the last 5 years and how this was disposed of
- We will disregard any lump sum received by a member of the armed forces as compensation for an injury or disability sustained on active service for the benefit of the calculation.

These criteria may be reviewed should application of the policy be seen to be unfairly disadvantaging a home seeker or their household where other factors indicate that they will be unable to meet their needs in the private sector. This will be considered on a case by case basis.

¹ Assessment of income and equity levels is based on housing market and affordability data from Hometrack Housing Intelligence (August 2023).

² The household definitions within section 6 will apply

Contact Details

For more information contact the Housing Choices Team at North West Leicestershire District Council

Visit us at our customer centre on Belvoir Road in Coalville (opposite Insomnia Coffee). Please note that application specific enquiries and support require an appointment.

Write to us at:

Housing Choices
North West Leicestershire District Council
PO Box 11051
Coalville
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17. REVIEW OF HOUSING ALLOCATIONS POLICY TO ACCEPT ANY PROPOSED CHANGES TO THE HOUSING ALLOCATIONS POLICY AS A RESULT OF A REVIEW AND CONSULTATION

The Housing Strategy and Systems Team Manager presented the report.

In response to a question about the rate of people migrating to the area seeking housing, the Housing Strategy and Systems Team Manager advised Members on the qualifying categories which include residence, length thereof, and employment in the district.

A Member noted concerns constituents had with the choice based letting system. The Housing Strategy and Systems Team Manager advised that the authority could not take new applications for a period due to software change and the new system had also seen some teething problems; but an improvement could now be seen.

In response to the Chair's concern that some people may be unable to register online, the Housing Strategy and Systems Team Manager advised that in this case officers were able to help, but it was a question of balancing needs and officers time. Where appropriate people were encouraged to help themselves so officers could spend more time processing cases.

The Chair asked if local charities and partners could help and the Housing Strategy and Systems Team Manager advised that yes, people are directed to them.

The Chair asked when a good time for a review of this would be. The Housing Strategy and Systems Team Manager suggested at least six months of letting data was realistically needed to track any changes and suggested a return to the Community Scrutiny Committee in a year.

The Portfolio Holder noted that this is a tricky issue as demand was high and the situation was complex. He hoped the policy produced was felt to be fair and equitable and he thanked Members for their contributions to that process.

The Chair thanked Members for their comments which would be presented to Cabinet when they considered the report on 12 December.

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NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

CABINET – TUESDAY, 12 DECEMBER 2023



Title of Report	HOMELESSNESS STRATEGY	
Presented by	Andrew Woodman Housing, Property and Customer Services Portfolio Holder PH Briefed <input type="checkbox"/> Yes	
Background Papers	<u>Homelessness Strategy Community Scrutiny Report 28th September 2023</u> <u>Homelessness Prevention and Rough Sleeping Strategy Cabinet Report 5th March 2019</u>	Public Report: Yes Key Decision: Yes
Financial Implications	There are no financial implications arising directly from the approval of the Strategy. However, the impact of the Strategy will need to be considered as part of developing and approving the Budget and Medium Term Financial Plan as homelessness is a pressure within the local government sector.	
	Signed off by the Section 151 Officer: Yes	
Legal Implications	No direct legal implications arising from this report.	
	Signed off by the Monitoring Officer: Yes.	
Staffing and Corporate Implications	There are no direct staffing or corporate implications.	
	Signed off by the Head of Paid Service: Yes	
Purpose of Report	To allow Cabinet to consider the new five-year Homelessness Strategy.	
Reason for Decision	To ensure that the Council has an up to date homelessness strategy in keeping with legislative requirements.	
Recommendations	THAT CABINET APPROVE THE HOMELESSNESS STRATEGY 2024 - 2029	

1.0 BACKGROUND

1.1 Under the Homelessness Act 2002, all housing authorities must have in place a homelessness strategy based on a review of all forms of homelessness in their district. The strategy must be renewed at least every five years.

1.2 The strategy must set out the authority's plans for the prevention of homelessness and for securing that sufficient accommodation and support are or will be available for people who become homeless or who are at risk of becoming so.

1.3 The Council's last Homelessness Strategy was approved by Cabinet on 5 March 2019. As the end of the strategy's lifespan approaches, this new draft strategy sets out the Council's priorities for the next five years.

2.0 CONSULTATION

2.1 The draft Strategy has been developed in consultation with a range of key partners and stakeholders. Consultation and engagement has included:

- A shared partner engagement day alongside Melton Borough Council and Oadby and Wigston Borough Council
- An online public survey promoted to current and recent service users of the housing choices service
- A presentation to the Tenants and Leaseholders Consultation Forum
- Engagement with the local homelessness prevention forum
- A Member workshop.

2.2 Feedback across all these activities has fed into the draft Strategy and emerging actions.

2.3 Following on from consideration by Scrutiny Committee on 28 September 2023 the draft Strategy was shared with key stakeholders for comment. No further changes were required.

3 OVERVIEW OF THE STRATEGY

3.1 The Strategy reviews performance over the last five years and then identifies a set of priorities and potential actions to address those priorities.

3.2 Section 179 of the Housing Act 1996 sets out an obligation on the local housing authority to provide advice around homelessness to people in the district. Section 179(2) sets out particular groups the service must be designed to meet the needs of. These are:

- a) people released from prison or youth detention accommodation;
- b) care leavers;
- c) former members of the regular armed forces;
- d) victims of domestic abuse;
- e) people leaving hospital; and
- f) people suffering from a mental illness or impairment.

3.3 The Strategy is structured so as to have particular regard to the needs of these groups.

3.4 The Homelessness Code of Guidance for Local Authorities sets out that "in districts where there is evidence that people are sleeping rough, the homelessness strategy should include objectives to work toward eliminating rough sleeping." The Strategy also, therefore, considers the needs of rough sleepers in the District.

3.5 Finally, taking on board feedback from service users, the Strategy places a focus on the customer experience.

3.6 The Strategy identifies five priorities and sets out how the Council intends to address these, namely:

- Reduce demand for homelessness services through proactive support;
- Increase the number of positive outcomes for homeless households;
- Reduce demand and increase the quality of emergency accommodation;
- Better meet the needs of people with complex needs; and
- Eliminate rough sleeping where possible.

4.0 SCRUTINY

4.1 The draft Strategy was considered by Community Scrutiny on 28 September 2023. The minutes are attached as an appendix to this report.

4.2 Scrutiny sought clarification on a number of areas of the report and the section on “meeting the needs of particular groups,” was revised as a result with additional information added to make the comparative level of demand from the prescribed groups clearer.

5.0 IMPLEMENTATION

5.1 Once the Strategy is approved, an annual delivery plan will be developed to address the priorities agreed through the Strategy.

5.2 Oversight of the delivery plan will be through the Council’s multi-agency preventing homelessness forum.

5.3 Key performance information in relation to homelessness will also form part of the housing strategy and systems team plan.

Policies and other considerations, as appropriate	
Council Priorities:	- Communities & Housing - A Well Run Council
Policy Considerations:	Non.
Safeguarding:	There are no direct safeguarding considerations, however, the policy has particular regard to support for people subject to domestic abuse.
Equalities/Diversity:	An Equalities Impact Assessment has been undertaken and no adverse impacts on protected groups have been identified
Customer Impact:	The Strategy identifies the Council priorities for addressing homelessness. These will have a direct customer impact. The Strategy endeavours to have a positive impact on some of the most vulnerable customers we support.
Economic and Social Impact:	None Directly.
Environment, Climate Change and Zero Carbon:	None directly.

<p>Consultation/Community/Tenant Engagement:</p>	<p>The draft Strategy has been developed in consultation with a range of key partners and stakeholders. Consultation and engagement has included:</p> <ul style="list-style-type: none"> • A shared partner engagement day alongside Melton Borough Council and Oadby and Wigston Borough Council • An online public survey promoted to current and recent service users of the housing choices service • A presentation to the Tenants and Leaseholders Consultation Forum • Engagement with the local homelessness prevention forum • A Member workshop. <p>The draft Strategy was shared with key partners for comment.</p>
<p>Risks:</p>	<p>There is a risk of challenge from the Department for Levelling Up Homes and Communities if we do not have a Homelessness Strategy approved within the last five years.</p>
<p>Officer Contact</p>	<p>David Scruton Housing Strategy and Systems Team Manager david.scruton@nwleicestershire.gov.uk</p>

Homelessness Strategy 2024 – 2029

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Introduction

About this strategy

Not having a home or living somewhere that is unsafe or unsuitable can have a devastating effect on individuals and families. We want to ensure that we are taking the right approach to preventing homelessness and rough sleeping and supporting those who become homeless.

Our Homeless and Rough Sleeping Strategy sets the direction and priorities we will follow for the next five years in order to address homelessness in North West Leicestershire.

The strategy sets out our plans for the prevention of homelessness and for securing appropriate accommodation and support for those who are homeless or at risk of becoming so.

In order to inform and develop this strategy we have carried out a review of our homeless data from the last five years alongside a series of consultation points with customers, stakeholders and key partners. This has allowed us to understand the challenges and gaps within existing homeless services and identify the opportunities that we want to develop over the next five years.

We are lucky to have already developed strong partnerships locally with many homeless services and joint pathways are now being delivered at a County or sub-regional level. We have also maintained our own distinct voice in our locality through a regular homelessness forum for the area and this has allowed us to develop strong working relationships with a range of partners, organisations, and individuals.

Since our last homeless strategy we have increased the affordable housing available to those in need, secured funding for new services and repurposed vacant Council housing into use as emergency accommodation.

But despite the success and progress we have made over the last few years there remains further work to do. Homelessness is not unique to North West Leicestershire and the challenges we face in tackling the underlying issues as well as the effects is significant. This strategy aims to build on the strong foundations we have developed with an ambitious and comprehensive approach to tackling homelessness in North West Leicestershire.

The homeless picture

Much has changed since the last homelessness strategy was developed in 2018.

The Coronavirus created a number of challenges for homelessness services but also created opportunities. The need to redesign services to be delivered remotely has

allowed us to widen opportunities for people to access our services but at the same time other changes have reduced flexibilities in service provision, especially in accommodation settings.

The need to make accommodation covid safe led to changes that mean that some of the short-term emergency accommodation options our providers had in place to respond to surges in demand or extreme weather events, such as shared spaces or through sit up night provision, are no longer available.

Ongoing economic challenges have meant that some services have reduced, are at risk or are under increased pressure. We have had to be proactive with our own resources to fill these gaps. We have sought to work together wherever possible with our neighbouring authorities to maximise opportunities for bringing in funding and creating efficiencies. We have been successful in putting in place a Countywide Rough Sleeper Initiative (RSI) lead by ourselves on behalf of the seven district councils and Rutland which has both improved the range of services and support available to rough sleepers but also allowed us to better understand the true level of need in the district. This is one of a number multi-agency and sub-regional initiatives now in place covering areas such as prison release, hospital discharge and leaving care.

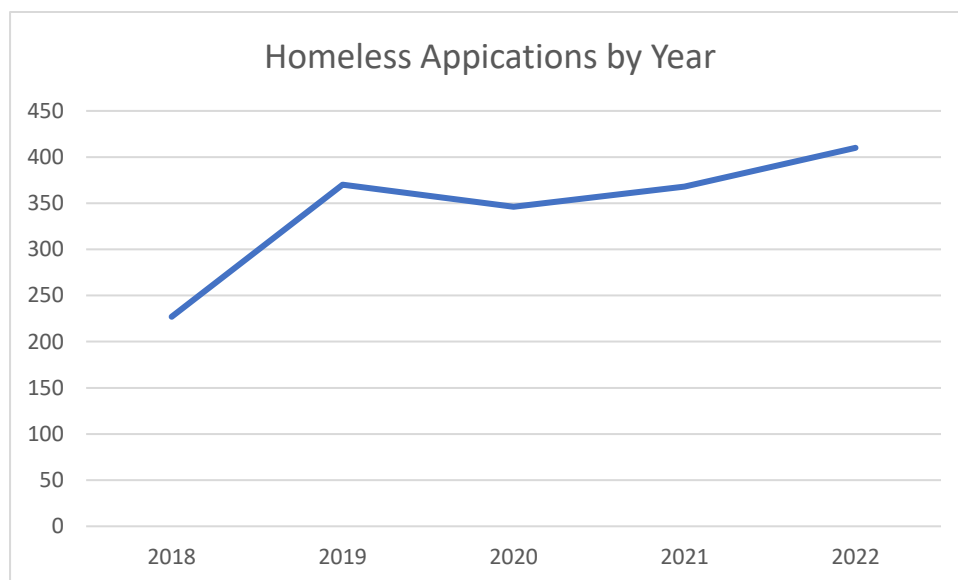
There have been other external factors too which have impacted on demand and have lead to us review our model of support. The most notable is probably the impact of the troubles in Ukraine and the introduction of the Homes for Ukraine scheme whereby members of our community opened their homes to those fleeing the war.

Over the lifetime of the last strategy we saw an increase in demand for our homeless services whilst at the same time a reduction in available accommodation options. Over the lifetime of this strategy we need to work smarter to address these challenges.

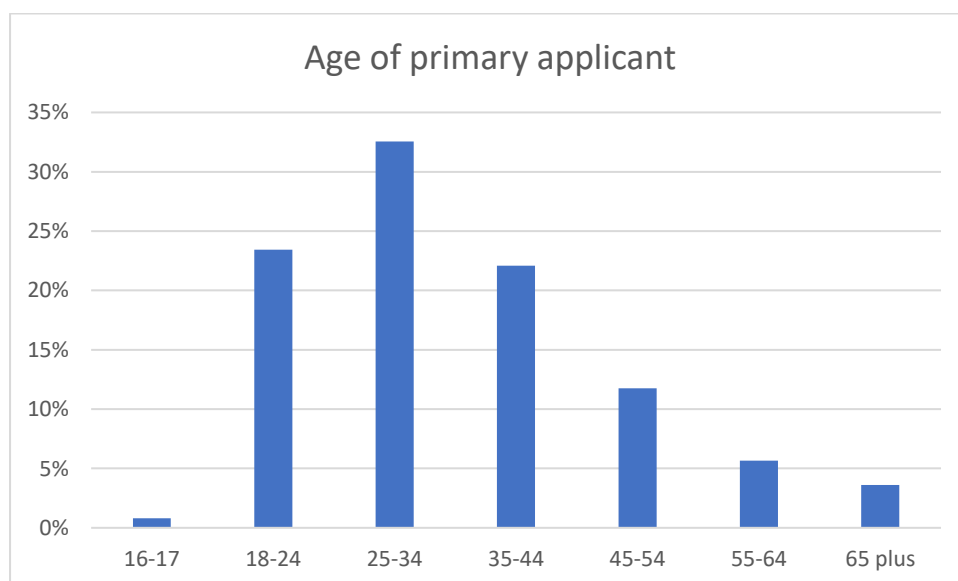
Key Challenges

Increasing Demand

The graph below shows the number of approaches for help received by the Council's Housing Choices Team that were assessed under the Homeless Reduction Act over the last five years.



As can be seen there has been a significant increase in homelessness cases over the period. The biggest jump was between 2018 and 2019 and this may in part be explained by the fact that this was the period where staff and indeed customers were adjusting to the new requirements of the Homelessness Reduction Act but the trend has continued overall since then albeit at a slower place.



The majority of people approaching us for assistance are between the ages of 25 and 34 with 51% identifying as Male. This has been largely consistent over the last five years.

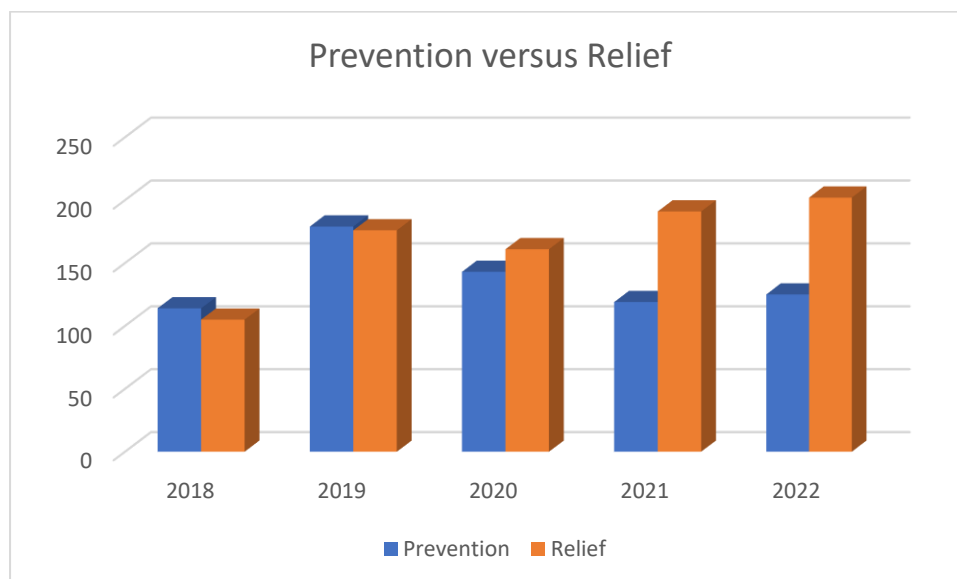
Of the households who are dealt with at the prevention stage 45% contain dependent children. At relief stage this drops to 20%. The split between singles/couples approaching for support and families has remained at a similar level throughout the last five years.

Early Intervention

The chart below shows the split between households approaching at a point where they are still in accommodation (prevention cases) and those who are already homeless (relief cases).

Where households do require assistance this is most effective when it can be provided before someone becomes homeless (so at the prevention case stage).

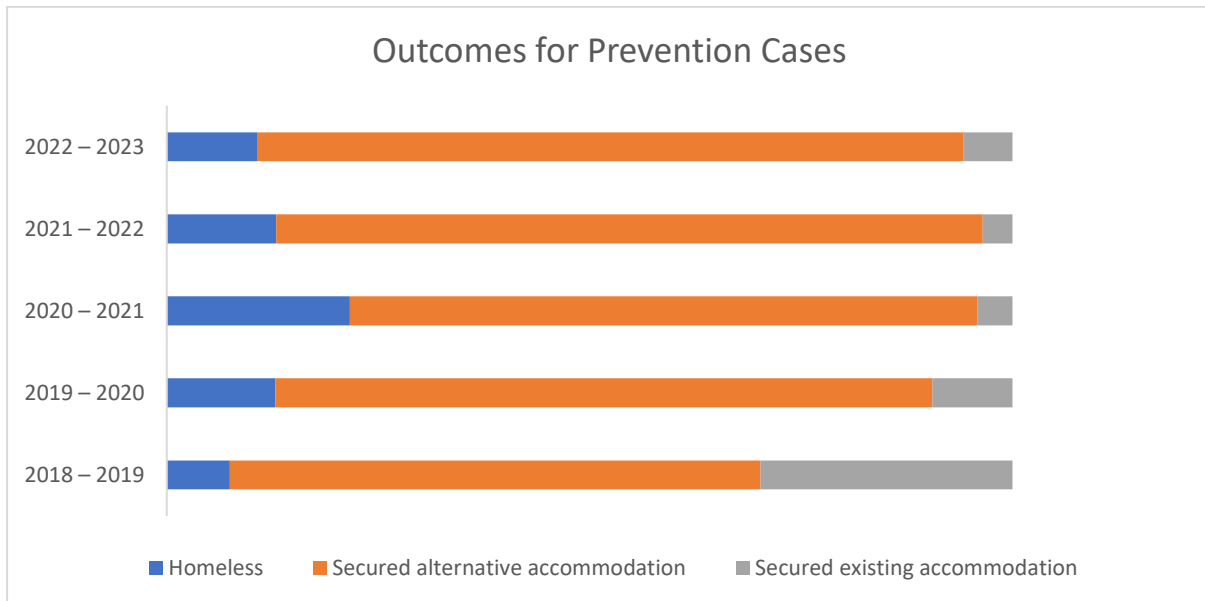
In 2018 and 2019 prevention cases were outnumbering relief cases however in 2020 this situation reversed and the gap between the two has been increased.



During the prevention stage a positive outcome can be as a result of providing assistance so that someone can remain in their existing accommodation or providing support to access a new home through a planned move. Only around 9% of prevention cases are closed because the household's existing accommodation was secured for at least another six months with the number of prevention cases that move through into relief (when homeless cannot be prevented) averaging around 11%.

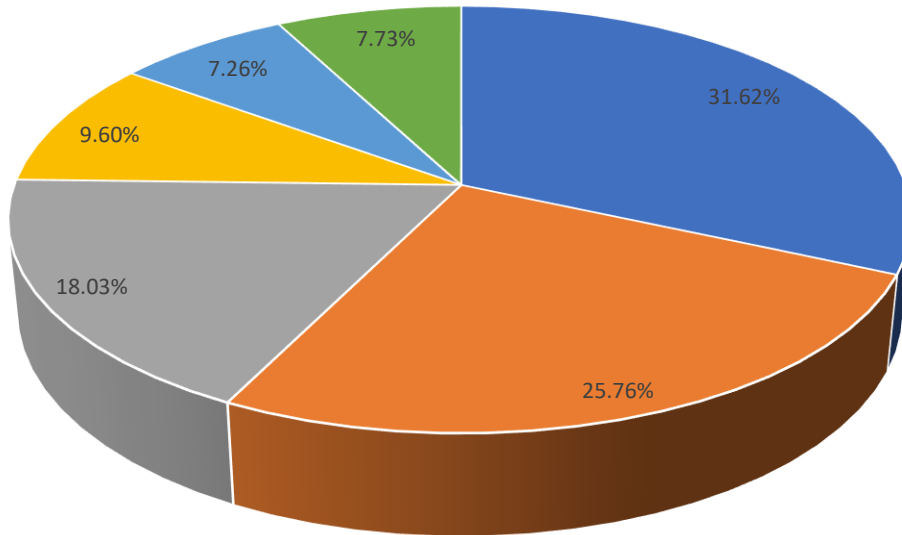
The graph below illustrates the change in outcomes for those approaching us as threatened with homeless over the last five years. It should be noted though that the profile of cases falling into this category will have fluctuated during the period as a

result of government interventions during the Covid pandemic such as the moratorium on evictions.



The chart below illustrates the outcomes for those who secure alternative accommodation at the prevention stage. As can be seen well over half move into social housing through the council or a registered provider.

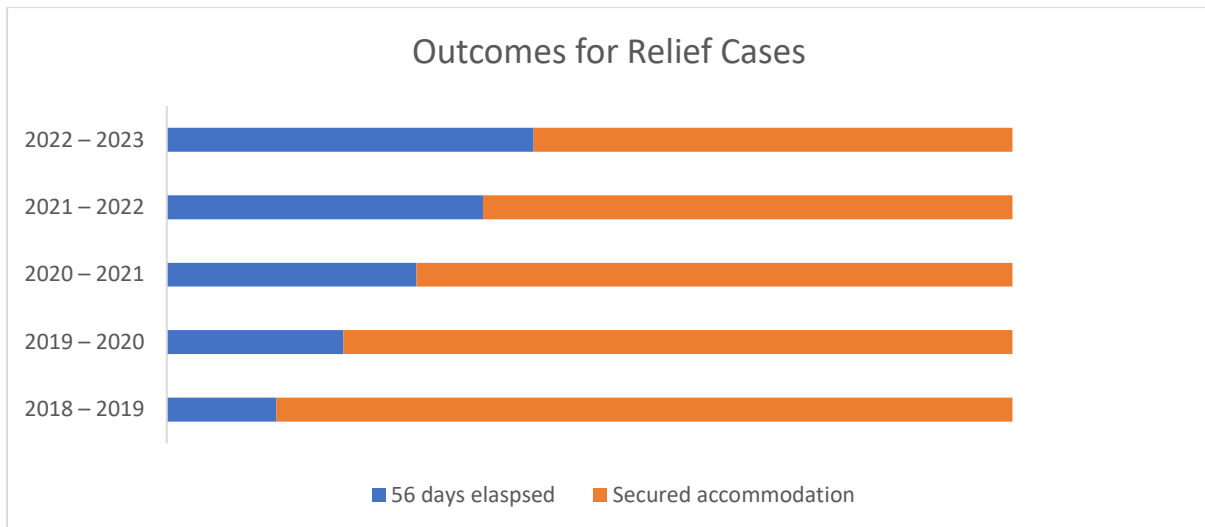
Prevention Outcomes (alternative accommodation)



- Council tenancy
- Registered Provider tenancy
- Private rented sector: self-contained
- Staying with family
- Social rented supported housing or hostel
- other

If we are to minimise the impact of homelessness on our customers and make best use of our resources it is critical that we maximise the number of households we support at prevention stage and maximise the number of positive outcomes for all of our customers.

Not only have we seen an increase in the proportion of cases being assisted at relief stage as can be seen from the graph below there has been a steady increase in those not securing alternative accommodation within the 56 day relief period.



Whilst those households to whom we owe a full homeless duty will continue to receive support once the relief stage has ended at the very least this reduction in positive outcomes will lead to extended stays in temporary accommodation and for those to whom we don't owe a full duty the likelihood of a prolonged period of homelessness.

Through engagement with partners during the development of this strategy we have identified a number of areas to explore in terms of additional prevention options.

These include improving access to appropriate advice, ensuring support is available when needed and upskilling customers to maintain accommodation more effectively.

Additionally the opportunities afforded to households through access to social housing has been decreasing particularly to those with lower levels of housing need. In 2016 almost 75% of lettings were to applicants in the lower bands and this had reduced to around 30% by summer 2023. This means the chances of assisting people with planned moves before they reach serious housing difficulty has greatly reduced. As access to social housing constricts we will need to identify alternative options to support people to maintain their existing accommodation or move to more appropriate homes.

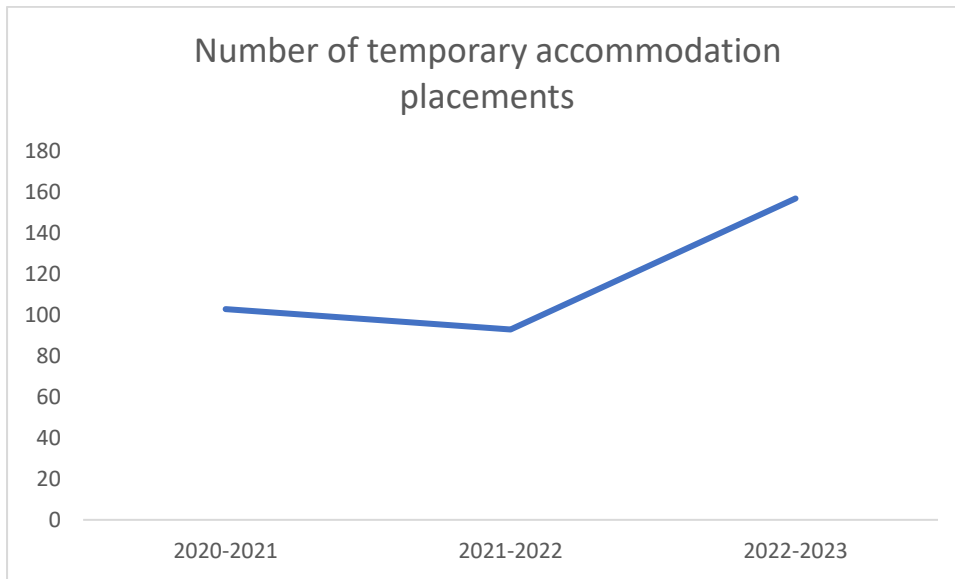
Temporary Accommodation

Temporary accommodation is provided to households who are homeless and in priority need. This will be all families with children or where a household member is pregnant but for single people they will need to have been assessed as vulnerable.

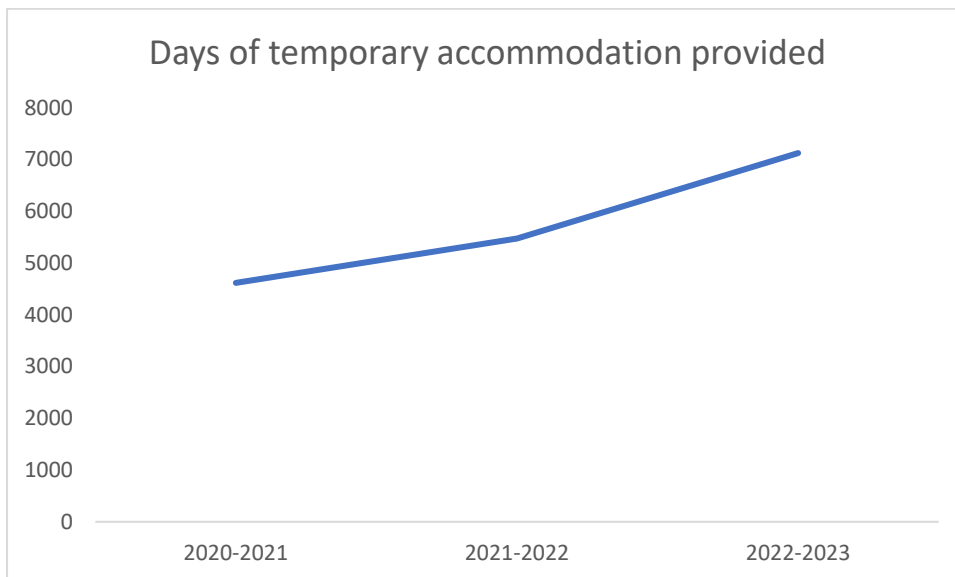
Over the last five years we have seen a significant increase in the demand for temporary accommodation.

Focussing on the last three years where our data is more detailed the number of people requiring (and entitled to) temporary accommodation has increased from around 100 each year to over 150 (as illustrated in the graph below.) As the Government's "everybody in" initiative whereby local authorities were encouraged to accommodate those individuals to whom they did not owe a duty was in place in the

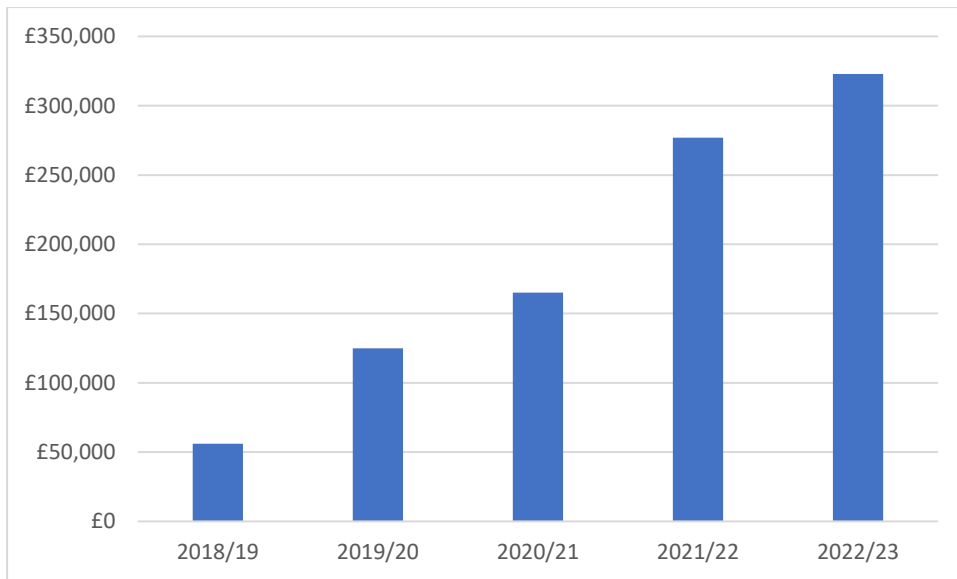
early part of 2020 the increase in demand over the last three years would inevitable have been even starker was this not the case.



The graph below illustrates the number of days of accommodation provided and this shows that even though the number of placements dropped in 2021/22 the number of nights of accommodation provided still increased.



As a result expenditure on temporary accommodation has also increased.



Of 413 households placed in temporary accommodation since April 2020 almost 84% were in temporary accommodation for less than 3 months. Another 13% were accommodated between three and six months. Only 15 individuals were accommodated for over six months but whilst our long term placements are fortunately low these cases will be some of the most challenging in terms of suitable long term options.

Around 85% of cases accommodated were single people and childless couples with families with children or expectant mothers making up just 15%

The average length of stay for those with children or who were pregnant was 43 days slightly lower than the 50 days for those without although the longest stay of any family was 221 days as opposed to 404 for a single person suggesting that more challenging cases are often single person households.

89 of the singles/couples or 26% were accommodated for 7 days or less for families this was just below 20%. This demonstrates that any temporary accommodation model developed needs to be responsive to a significant throughput of short stay placements as well as a number of longer term stays.

Whilst reducing temporary accommodation is a key target so too is increasing the quality of Temporary Accommodation when we do need to use it.

If we can improve positive outcomes for people at the prevention stage this will have the direct impact of reducing demand for emergency accommodation as well as delivering better outcomes and reducing uncertainty and disruption to people.

If we are able to increase the range of alternative housing options for all, this will benefit those in emergency accommodation and reduce the length of time households are required to stay in such provision.

The district has seen a significant increase in demand for temporary accommodation. Whilst a key objective is to reduce the overall use of emergency accommodation there will always be a need for some people to access such provision.

Bed and Breakfast is both poor quality in terms of outcomes but also in terms of value for money. Therefore we will continue to work on alternative provision that is improves outcomes for customers by redirecting current expenditure.

We also need to review our approach to charging for emergency accommodation to ensure we are fair and consistent.

Role of the Private Rented Sector

The Private Rented Sector (PRS) Is both a cause of homelessness but also an effective housing option for many customers.

Whilst reforms to the sector, such as the Rent Reform Bill are intended to improve security for private tenants this coupled with other external factors such as interest rate rises do appear to be having an impact on the sector and leading to some movement in the market with smaller landlords in particular looking to withdraw.

PRS accommodation currently makes up a much lower percentage of accommodation outcomes than social housing for our homeless households however it remains an important option particularly for certain households who are unable to access social housing or who have needs that cannot easily be met through the available social housing stock.

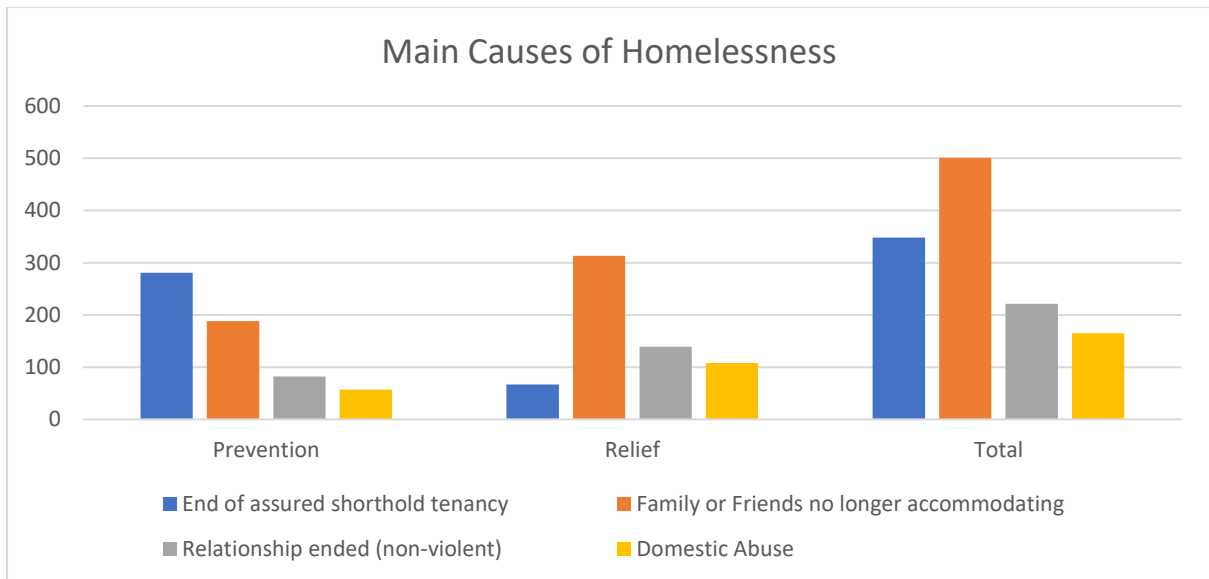
To ensure the PRS works effectively it is important that both tenants and landlords understand their rights and responsibilities and are able to access the support they need.

We, therefore need to review our offer of support to existing and potential PRS tenants as well as review our engagement with private landlords in the district to work more effectively with them as well as to try and improve the quality of the PRS and customer confidence.

Key causes of homelessness

The chart below shows the main causes of homelessness in the District. The top four causes of homelessness are the same at both the prevention and relief stage albeit coming out in a different order with notices from private accommodation being the biggest single cause at the prevention stage whilst family and friends asking people to leave is the bigger cause at the relief stage.

Although for homeless monitoring purposes family and friends no longer able to accommodate, are grouped separately, we have chosen to view these as one group as they cover a wide range of similar scenarios.



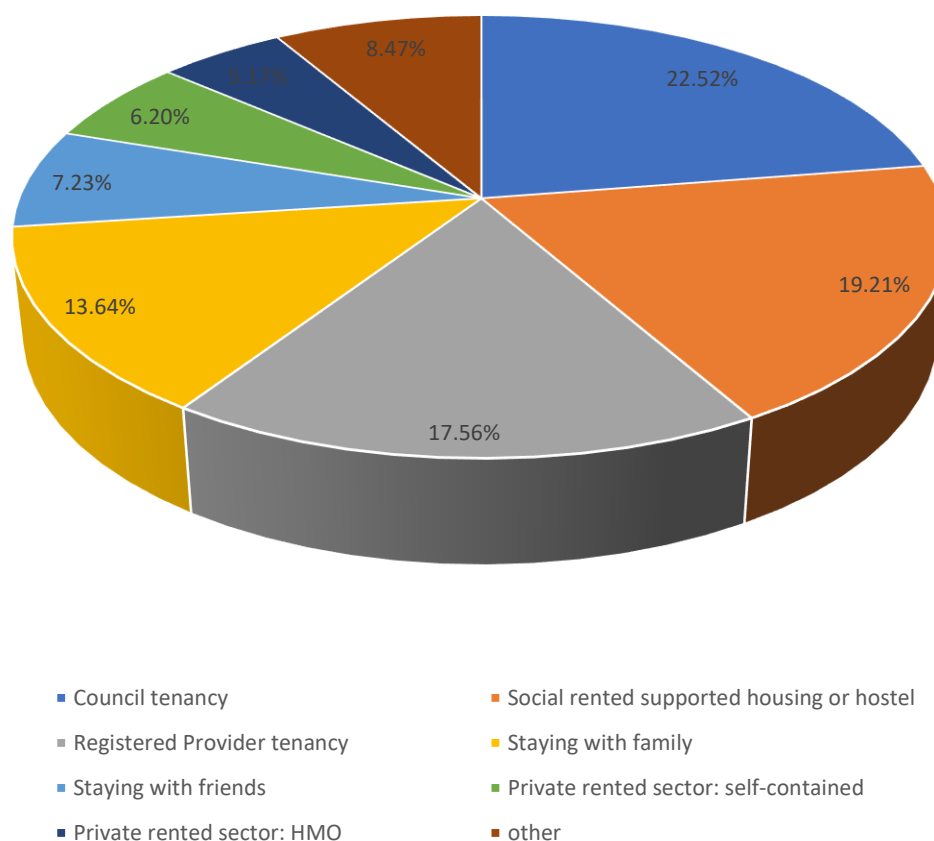
When grouped together, family and friends no longer able to accommodate accounts for 30% of cases overall and the single greatest cause in total.

In most of these scenarios interventions need to focus on facilitating planned moves and managing short term friction rather than sustaining arrangements on a longer term basis.

Accommodation Options

When we look at the accommodation outcomes for people who have become homeless we can see the importance of supported accommodation. Almost a fifth of homeless households move into supported accommodation (usually shorter term accommodation.)

Relief Outcomes (alternative accommodation)



This is likely to be in part because those who find themselves homeless are more likely to have support needs but also because such schemes often prioritise their vacancies based on need so those already homeless will tend to be better placed on waiting lists.

If we want to continue to provide positive outcomes for homeless households we will need to ensure that we have a good supply of supported housing which is able to meet people's needs as well as more flexible options for support. Equally important though is the need to ensure such schemes have effective move on pathways to generate sufficient vacancies. Developing options to support households in general needs accommodation as they transition into independence and at times of crisis is therefore key both to support move on from supported accommodation as well as to assist those for whom supported placements are not available or appropriate.

Improving access to services

As part of the development of this strategy we have asked customers about their experience of the service they received.

Whilst it is reassuring that the majority of customers who have received assistance felt the experience was positive there are key themes that came out of the consultation that we can address to improve the customer experience.

Customers felt that they are approaching the local authority for assistance at the earliest possible opportunity although as can be seen from our data we are seeing an increasing proportion of approaches after people have become homeless.

Customers also reported that they were not sure how to seek assistance and the vast majority approached the local authority in the first instance despite a range of partners in the district who provide advice and support.

Once receiving assistance they felt they would benefit from having more timely information about their case and what was happening.

This insight will help inform future service development.

Meeting the Needs of Particular Groups

Section 179 of the Housing Act 1996 set out an obligation on the local housing authority to provide advice around homelessness to people in the district

Section 179(2) sets out particular groups the service must be designed to meet the needs of

- a. people released from prison or youth detention accommodation;
- b. care leavers;
- c. former members of the regular armed forces;
- d. victims of domestic abuse;
- e. people leaving hospital;
- f. people suffering from a mental illness or impairment;

furthermore we should consider any other group identified as being particularly at risk of homelessness in the district.

The table below provides indicative figures for the number of customers who fall into each of the categories below by year together with the total number of homeless cases each year for context. The categories are not exclusive and one applicant may fall into more than one category.

Year	2018 – 2019	2019 – 2020	2020 – 2021	2021 – 2022	2022 – 2023	Total
Domestic Abuse	34	33	48	66	47	230
Mental Health	31	51	56	91	59	288
Leaving hospital	0	1	0	3	0	4
Armed Forces	2	1	3	3	1	10
Care Leavers	1	5	1	5	4	16
Prison Leavers	7	9	11	15	15	57
Total Homeless Applications	337	358	335	405	397	1845

When developing this homeless strategy we have specifically looked at each key group to determine what the demand is and what existing service provision looks like. Our consultation work has then identified any gaps in provision and opportunities to improve support which we have then sought to include as potential actions under our identified priorities.

People Released from prison or youth detention accommodation

Available Evidence

Around 5.5% of homeless cases are identified as having a support need as a result of their offending history however this contrasts with less than 1% that are identified as being homeless as a result of leaving custody. This could suggest that the impact of offending goes far beyond the initial homelessness that occurs for some on release from prison.

The majority of referrals that are received through the duty to refer, a statutory requirement for certain agencies to refer homeless households to the local authority are for those within the criminal justice system with an average of seven referrals a year.

What we are currently doing

North West Leicestershire District Council takes a sub-regional approach to those released from prison and youth detention being a signatory to a protocol shared with the City Council, the other Leicestershire districts and Rutland.

The protocol is currently being reviewed and one of the emerging issues is the fact that because of the structure of the criminal justice system prisoners may be released from a number of prisons and courts across the region.

We have, therefore, begun work to try and develop more regional approaches to managing ex-offenders.

What we need to do

Two areas identified within the consultation that partners felt were key to this group were ensuring appropriate accommodation was available recognising that those with an offending history often face additional barriers to accommodating both emergency and long term accommodation with specific offences, such as arson making it particularly difficult to access emergency accommodation.

It was also identified that ensuring that prisoners can access the right advice and services in a timely manner whilst still within prison was key to positive outcomes.

Care Leavers

Available Evidence

Only 1% of applications are identified as having support needs as having been in care (within the age group 18-20) and a smaller proportion again as older care leavers.

Leicestershire County Council is subject to the duty to refer in terms of children leaving their care. On average we received two referrals a year.

Because we take a proactive approach to supporting care leavers access accommodation before their care placement ends we are able to keep the number of homeless cases low.

What we are currently doing

The Leicestershire Districts work closely with the County Council leaving care team to ensure positive pathways for young people leaving care in the County.

As well as reviewing and updating a county wide leaving care protocol we are also working on a number of new accommodation options to better meet need and enable a more appropriate set of transition options.

What we need to do

Whilst wherever possible we work jointly to ensure young people transition into settled accommodation in a controlled way there are occasions where this does not

happen. Also a number of people leaving care will not settle effectively in their accommodation and require further assistance after moving into independence. Anecdotally people who have been in the care system are particularly prone to repeat instances of homelessness within a relatively short period of time.

One particular challenge which we have seen is an appropriate offer of support for those within the care system who form relationships with much provision geared up for single people only.

The consultation identified the need for appropriate move on accommodation for young people when they are leaving care but also the need to ensure staff are appropriately trained to understand the needs of care leavers. We also need to ensure that support can meet the range of needs that care leavers present with.

Former members of the regular armed forces

Available Evidence

North West Leicestershire does not have any MoD estate within the district however we do have a strong tradition of support veterans who approach us for support.

On average though only two cases a year have been identified where an applicant has support needs as a result of having been in the armed forces and the numbers presenting as homeless as a result of leaving the forces are even lower.

What we are currently doing

The Council has signed up to the armed forces covenant. We have also framed our allocations policy to offer additional preference to former members of the armed forces

What we need to do

The support available to veterans and agencies working in the district has changed in recent years and we need to ensure all frontline staff are aware of the current offer. We will, therefore, begin an engagement exercise with relevant stakeholders to ensure that former members of the armed forces are assisted to access all the support that is available.

Victims of domestic abuse

Available Evidence

Around 8.5% of homelessness applicants have an identified support need as a result of domestic abuse. This is slightly lower than the 10% of cases where domestic abuse is the cause of homelessness.

What we are currently doing

We have identified the advantages of taking a pro-active multi-agency approach to supporting victims of domestic abuse.

As a result we have funded a domestic abuse link worker to work within the housing choices team for a number of years.

Recent changes to legislation in particular the Domestic Abuse Act 2021 have widened the responsibilities toward victims of domestic abuse. It is a particular challenge then to ensure we are working effectively with other statutory partners as

well as the voluntary sector to ensure that our response is suitable, sustainable and sensitive.

Work is underway to develop a multi-agency pathway for victims of domestic abuse to ensure a clear and consistent offer to those seeking support. Because a number of key partners work across the Leicester, Leicestershire and Rutland (LLR) area and because on occasions those fleeing domestic abuse will want to move away from their existing localities for safety reasons this work is being carried out at a sub-regional level. A scoping workshop with all key agencies is already scheduled.

What we need to do

Consultation identified the need to increase the availability of dispersed accommodation for people fleeing domestic abuse. The County Council is currently in the process of commissioning additional accommodation services and we will work with them to support the delivery of these units.

People leaving hospital

Available Evidence

Whilst the majority of people leaving hospital will have safe and secure accommodation to return to a small number will have lost accommodation as a result of their medical situation or no longer have a home to return to suitable to their needs.

A lack of suitable accommodation to discharge into to continue recovery is a significant drain on health resources and so effective joint working is key to making the best use of scarce resources across the public sector.

That said over the last five years only four cases have been recorded as homeless as a result of leaving hospital.

At the same time around 9% of homeless applications are identified as having a support need as a result of physical health (alongside over 15% as a result of mental health issues.) Whilst there is no reason to assume these are approaching us from a hospital setting it may suggest that we need to review our data to ensure we are capturing peoples circumstances correctly particularly in this area.

What we are currently doing

We are part of a sub-regional partnership with our local authority peers and the local NHS services to provide pro-active support to patients who face barriers to discharge from hospital.

The service provides both practical support to allow those with accommodation to return home as well as assistance with accessing alternative housing options where this is not an option.

What we need to do

Consultation has identified the advantages that having appropriate step down accommodation for people leaving hospital would make. It also identified the importance of having appropriately trained staff within housing teams.

People suffering from a mental illness or impairment

Available Evidence

Approximately 15.5% of applicants are identified as having support needs in relation to their mental health

Anecdotally this group is the one that have the greatest difficulty securing, and maintaining appropriate accommodation whether that be emergency placements, short term supported accommodation or longer term housing options.

They are also disproportionately represented within the rough sleeping community a group that are the most excluded from many services.

What we are currently doing

We have been working hard to integrate services to those struggling with their mental health into the wider homelessness offer. Work has been ongoing for a number of years to develop a specialist service for the homeless with mental health issues and we continue to support and advocate on behalf of our colleagues in health to move this work forward. We have also submitted and supported funding bids for more resources in this area.

What we need to do

The overwhelming feedback from consultation was the need for more specialist accommodation for this client group. This mirrors the conclusion of other work within the County.

Other Groups

The Act encourages us to consider whether there are other groups within the locality who would benefit from a focussed homelessness response. Whilst there have been no other specific groups identified as part of this strategy development we have identified that groups with multiple needs find it particularly difficult to secure appropriate services to meet their complex needs.

Supporting those with complex needs

As part of the homeless assessment, officers have to identify both the accommodation needs of the household but also any support needs.

Whilst around half of households to whom we owe a homeless duty have at least one identified support need around 3.5% of applicants have three or more. Whilst these figures are low overall such cases often require a disproportionate amount of resource to secure positive outcomes and are most likely to become repeat cases after being unable to maintain housing independently.

The Rough Sleeping Initiative has introduced the concept of the Target Priority Group. This involves an assessment to identify those individuals at particular risk of rough sleeping and with additional needs. We are then encouraged to monitor the housing situation of these clients and identify when they are at risk of further homelessness.

We hope to replicate this approach to those without a history of rough sleeping to identify cases where additional resource or a different approach will be required.

The Council has also been part of a pilot programme with health and colleagues in adult social care to develop a complex needs accommodation board where individuals with complex needs whose accommodation needs are not being effectively met can be escalated to a panel of senior staff to unblock barriers and seek creative solutions. We will continue to support this programme and use the learning to improve services more widely.

As a result of the particular challenges those with multiple needs face we have included a priority in this strategy to better meet the needs of this group.

Rough Sleepers

The Homelessness Code of Guidance sets out that “in districts where there is evidence that people are sleeping rough, the homelessness strategy should include objectives to work toward eliminating rough sleeping.”

We are fortunate that in North West Leicestershire reports of rough sleeping are relatively low. The table below shows the number of reports and number or uniquely identified cases over the last two years. (Reports will often include people who are not actually sleeping rough and multiple reports of a single individual may be received.)

	2021/22			2022/23				2023/23
	Quarter Two	Quarter Three	Quarter Four	Quarter One	Quarter Two	Quarter Three	Quarter Four	Quarter One
Reports	3	9	7	8	16	8	12	16
identified	0	4	1	3	6	0	2	8

As part of the rough sleeping initiative funding we are required to develop an annual ending rough sleeping plan through co-production with our rough sleeping advisor and we will continue to do this however there are a number of key actions that interrelate with the wider objective of this strategy.

We have adopted a definition of ending rough sleeping in keeping with the Department for Levelling Up, Housing and Communities (DLUHC) publication “Ending Rough Sleeping For Good.” Our end goal is for rough sleeping to be prevented wherever possible but when it does occur, it must be rare, brief and non-recurring. Achieving this is the final priority of this strategy.

Our Priorities and Actions

This strategy sets out five priority areas that will drive the Council's work over the next five years and allow us to deliver our vision for preventing homelessness and rough sleeping

We cannot deliver this work alone and we will, therefore, work closely with the community and partner organisations to ensure these commitments are delivered..

Priority One: reduce demand for homelessness services through proactive support

WHY? We are seeing more people approaching us for help at the point that they are homeless and in urgent need of housing. We are also finding more people, particularly younger people, returning into homeless services after finding it difficult to maintain a home. We need to focus on prevention and support to reach people at a stage where we can enable a planned move into the best possible home to meet their needs. By the end of this Strategy Period, we are seeking to:

- Work collaboratively with key partners to improve advice and support
- Develop a communications programme to promote the housing choices service and other support available to residents
- Review case work processes to ensure customers are provided regular and appropriate updates
- Develop a training programme for housing choices staff which includes trauma informed approaches
- Carry out a mapping exercise of available support and services to former members of the armed forces within NWL

Priority Two: increase the number of positive outcomes for homeless households

WHY? We are seeing too many households that are unable to resolve their housing situation before becoming homeless and too many cases where households lose contact with services. We need to have the tools available to resolve homelessness rapidly and effectively and the processes in place to monitor and support people during a time of insecurity.

By the end of this strategy period we are seeking to:

- Explore opportunities to introduce mediation services for those asked to leave by family/friends
- Review private rented sector support offer for tenants
- Re-establish landlord engagement projects to promote joint working and take up of local accreditation scheme(s)
- Explore options for step down/move on accommodation for care leavers, those released from hospital, ex-offenders
- Identify opportunities for network of safe disbursed accommodation for those at risk of domestic abuse
- Identify a nominated Single Point Of Contact (SPOC) within the housing department to work with key referral partners
- Explore a regional approach to prison release protocols and pre-release assessments

- Develop multi-agency sub-regional approach to domestic abuse
- Identify pathways into appropriate support for veterans in relation to issues such as PTSD.

Priority Three: reduce demand and improve the quality of emergency accommodation

WHY? Staying in temporary accommodation is stressful and takes people away from employment, schools and support networks at an already difficult time. The cost of providing temporary accommodation is increasing and takes valuable funding away from the delivery of other homeless services. We need to ensure that when we provide emergency accommodation it is for as short a time as possible and provides a stable and supportive base that allows people to move forward with their lives.

By the end of this strategy period we are seeking to:

- Undertake a modelling exercise identify our emergency accommodation needs
- Develop alternative provision to bed and breakfast accommodation
- Evaluate and re-commission the floating support service for those in emergency accommodation
- Introduce a charging policy for emergency accommodation

Priority Four: better meeting the needs of people with complex needs

WHY? Households with complex needs face some of the greatest challenges and resolving their housing often requires a sharing understanding and collaborative approach across several agencies. These households are also those most likely to return into homeless services due to difficulties in sustaining accommodation. We need to develop a more innovative approach to resolving homelessness for these households that will improve outcomes and free up resources.

By the end of this strategy period we are seeking to:

- Work with Leicestershire County Council to help roll out a homeless mental health service in the District
- Develop more specialist accommodation for people with mental health issues
- Agree a definition of “complex” cases and ensuring cases and individuals are identified and outcomes monitored.
- Develop a multi-agency approach to housing complex cases where housing options are limited due to support needs or past behaviour

Priority Five: End Rough Sleeping

WHY? No one should have to suffer living a life deprived of shelter, warmth and basic necessities. Although rough sleeping numbers in the District are low the impact on the individuals is high. Tackling rough sleeping requires a dedicated and thoughtful response in order to engage and support people with often complex reasons for ending up sleeping rough.

By the end of this strategy period, we are seeking to:

- Explore opportunities for closer working between City and County
- Increase off the street accommodation options for rough sleepers
- Promote the streetlink service so that the public are able to effectively report potential rough sleepers

How we will Measure Success

Our strategy covers a period of five years. It is hard to fully predict the changes that will occur over this time period so we will need to be flexible in our approach to the delivery of the Strategy and be able to adapt and change depending on the circumstances. We will continue to be open to new opportunities wherever they help us to meet the priorities of the Strategy which we believe provide the correct long-term direction for tackling homelessness.

Partnership working is key and the sub-regional homelessness delivery group as well as our local Homeless Prevention Partnership (HPP) will be key to ensuring the right agencies are involved in moving services forward.

To make sure that the delivery of our strategy is monitored and scrutinised, and that work is progressing as it should a regular update will be provided to the HPP alongside an update on the key homeless data to demonstrate the impact of our activity. The Strategy actions will also be reviewed annually to ensure they are still relevant and appropriate with input from the HPP.

16. HOMELESSNESS STRATEGY TO APPROVE THE COUNCIL'S NEW FIVE YEAR HOMELESSNESS STRATEGY

The Housing Strategy and Systems Team Manager presented the report.

In response to a question about plans to bring in a charging policy for emergency accommodation, the Housing Strategy and Systems Team Manager advised that the policy was focused on recouping some costs towards bed and breakfast housing schemes, whilst remaining fair and equitable.

In response to a question about the data for the last 12 months, the Housing Strategy and Systems Team Manager advised that commentary and indicative data can be found in each relevant category. Mental Health issues were the largest single category.

A Member asked if the drop between 2019 and 2021 could be explained by Covid and national Government policy. The Housing Strategy and Systems Team Manager advised that this was the case, particularly the moratorium on evictions. The five year time span for data was hoped to somewhat negate the effect of such anomalies on the usefulness of the data. The Chair asked how much the organisation would save on temporary accommodation if we moved away from using bed and breakfast schemes.

The Housing Strategy and Systems Team Manager advised that government policy was designed to make bed and breakfast schemes for homeless people financially punitive for Local Authorities so to discourage their usage. In most models the organisation would have to pay for some support which could not be recouped. He proceeded to detail some of the issues with bed and breakfast schemes.

The Chair then asked if this was part of a wider strategy and the Housing Strategy and Systems Team Manager advised that yes, the organisation was trying to be more proactive, though accepting some people would always require emergency help.

The Portfolio Holder commended the workshop which had been organised. He added that five year trends were undesirable though national factors had to be considered.

It was moved by Councillor T Eynon, seconded by Councillor S Lambeth and

RESOLVED THAT:

The report be noted and the focus on improving the quality of and reducing the need for temporary accommodation be welcomed.

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NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

CABINET – TUESDAY, 12 DECEMBER 2023



Title of Report	NWLDC CORPORATE SPONSORSHIP AND ADVERTISING POLICY	
Presented by	Councillor Tony Gillard Business and Regeneration Portfolio Holder PH Briefed: Yes	
Background Papers	Corporate Scrutiny Committee, 23 November 2023.	Public Report: Yes
		Key Decision: Yes
Financial Implications	There are no cost implications of implementing the Policy. Finance will be consulted on advertisement and sponsorship arrangements.	
	The advertising or sponsorship should make a net positive contribution to the finances of the Council. Business cases will be undertaken to assess the value of advertising and sponsorship opportunities Signed off by the Section 151 Officer: Yes	
Legal Implications	Legal Services have provided advice on the draft policy.	
	Signed off by the Monitoring Officer: Yes	
Staffing and Corporate Implications	Set out in report.	
	Signed off by the Head of Paid Service: Yes	
Purpose of Report	This report sets out the proposed Advertising and Sponsorship Policy and provides the feedback from the Corporate Scrutiny.	
Reason for Decision	To adopt the new Advertising and Sponsorship policy.	
Recommendations	THAT CABINET: <ol style="list-style-type: none"> 1. REVIEWS THE PROPOSED ADVERTISING AND SPONSORSHIP POLICY, INCLUDING FEEDBACK FROM CORPORATE SCRUTINY COMMITTEE. 2. APPROVES THE ADOPTION OF THE ADVERTISING AND SPONSORSHIP POLICY. 	

1.0 Background

- 1.1 A new corporate Advertising and Sponsorship Policy has been developed to establish a protocol for managing commercial advertising and sponsorship.
- 1.2 The purpose of introducing the Policy is to establish guidance that will enable all departments of the Council to take a consistent and corporate approach when:
- Considering opportunities for sponsorship of Council properties, events, services and other activities.
 - The placement of advertising in or upon Council property, events or activities.

2.0 Context

- 2.1 To ensure that sponsorship and associated commercial advertising activities entered in to by the Council are undertaken consistently and in line with the agreed processes and procedures, a draft Advertising and Sponsorship Policy has been developed.
- 2.2 The draft Advertising and Sponsorship Policy is attached in Appendix A.
- 2.3 The Policy is intended to:
- Provide a clear definition of 'Advertising'
 - Provide a clear definition of 'Sponsorship'.
 - Establish principles for seeking and accepting advertising and sponsorship of Council property and activities.
 - Establish protocols to support the process for decision making and the award of advertising and sponsorship.
 - Identify examples of acceptable advertising or sponsorship.
 - Identify examples of unacceptable advertising or sponsorship.
 - Outline the use of Council branding through advertising and sponsorship.
- 2.4 This draft Policy has been prepared based on initial work completed by the Council's Communications team in consultation with Legal Services, Economic Regeneration, Environmental Protection and Leisure Services. In doing so, good practice from similar policies adopted by other local authorities has been followed.

3.0 Corporate Scrutiny Committee

- 3.1 This Policy was presented to Corporate Scrutiny Committee on 23 November 2023.
- 3.2 Corporate Scrutiny Committee's recommendation to Cabinet is to defer the adoption of the Policy. Scrutiny Committee's recommendation is based on a series of points summarised below from 3.5 to 3.10.
- 3.3 The full minutes of the Corporate Scrutiny Committee, include the observations and are attached at Appendix B.
- 3.4 Corporate Scrutiny Committee feedback, along with an officer response to the feedback is set out below.

- 3.5 Committee feedback: (a) An improved layout and presentation of the proposed policy and (b) That the proposed Policy should include more definitive language, replacing the word 'should'.

Officer Response to (a) and (b): Officers are content with the structure of the proposed Policy. However, some of the language within the Policy has been rewritten to reflect the views of Committee to be more definitive. This is shown in red throughout the policy.

- 3.6 Committee feedback: (c) The Policy should be supplemented with a full breakdown of the realistic costs in officer time to administer the proposed policy and (d) That the policy should be supplemented with a forecast of income generation resulting from the proposed Policy.

Officer response to (c) and (d): It is not possible to forecast the level of income generation resulting from the proposed Policy as this will depend on the different opportunities that may arise during any given year. Guided by the proposed Policy, each service area will be responsible for securing their own advertising and sponsorship arrangements and the staffing capacity will be factored into the decision making to pursue sponsorship. On a case-by-case basis, each advertising and sponsorship opportunity will be subject to a business case assessment commensurate to the opportunity. The levels of benefits generated will be relative to the type of sponsorship or advertising being sought. The proposed policy is written to ensure any advertising or sponsorship arrangement will make a net positive contribution to the finances of the Council.

- 3.7 Committee feedback: (e) That the policy should be supplemented with a breakdown of how and where any resulting income generated through the Policy will be reinvested.

Officer response to (e): Officers propose that the Policy should not be overly prescriptive as to how income generated should be spent, instead individual service areas will prepare a business case for the advertising and sponsorship opportunity that will consider cost recovery and identify the best use of any additional income generated to support and enhance service delivery.

- 3.8 Committee feedback: (f) Concerns were raised over the reputational risk of the Council in collaborating with sponsors and (g) Concerns were raised over the limitations of restrictions over which organisations are permitted to enter advertising and sponsorship arrangements with the Council.

Officer response to (f) and (g): Chapter 5 of the proposed Policy sets out the parameters for which the Council will and will not enter into advertising and sponsorship arrangements. One of the consequences of having a corporate policy is to provide a framework to guide decision making and to mitigate the risks the Committee has identified. Chapter 11 of the proposed Policy sets out the process regular reviews of advertising and sponsorship arrangements and permits the Council to refuse or terminate arrangements.

- 3.9 Committee feedback: (h) The proposed policy should be expanded to also consider the Council's own advertising and sponsorship arrangements.

Officer response to (h): This was considered as part of the drafting of the Policy and was excluded intentionally. Should a policy be required for the Council's appetite for

sponsoring or advertising other activity, this could be prepared separately with a full consideration of subsidy control implications.

3.10 In addition, prior to the meeting, the Chair of Corporate Scrutiny Committee provided a four-page list of notes and suggestions for the proposed policy. These notes were not shared with Committee nor discussed with the Committee but have been given consideration by officers including in particular the points below:

- Considerations around consistency, compliance, reputational protection, value for money.
- Observations on permitted and non-permitted advertisement and sponsorship and the grounds for the Council's right to refuse advertising or sponsorship.

4.0 Resource Implications

4.1 The draft Policy proposes that all advertisement and sponsorship arrangements will be required to be prepared in the form of a written agreement (A template of the written agreement is presented in appendix 3) which will require approval by the relevant Head of Service, following consultation with legal and finance teams. This is detailed further in the draft Policy.

4.2 In addition, the use of Council branding and the Council logo must be considered in conjunction with the Council's Communications team.

4.3 Once approved, the Advertising and Sponsors Policy will be reviewed within the first 12 months to gauge how the Policy is implemented in practice. The review will be undertaken by the Economic Regeneration Service.

4.4 Liaising with the Council services areas who utilise the Policy, the Economic Regeneration Service will then review the policy every three years.

Policies and other considerations, as appropriate	
Council Priorities:	- Planning and regeneration - Clean, green and Zero Carbon - Communities and Housing - A well-run council
Policy Considerations:	No policy considerations.
Safeguarding:	No safeguarding considerations.
Equalities/Diversity:	No equalities/diversity considerations.
Customer Impact:	The Policy will provide a mechanism for generating funds to support the delivery of Council programmes that support our customers.
Economic and Social Impact:	The Policy will create opportunities for business and community groups to raise their profile through advertising and sponsorship.
Environment, Climate Change and Zero Carbon:	The Policy identifies industry categories that are not acceptable for entering into an advertising or

	sponsorship agreements. This includes industries directly involved in fossil fuel extraction (in recognition of the Council's Zero Carbon Action Plan)
Consultation/Community/Tenant Engagement:	This Policy has been shaped through consultation with NLWDC Corporate Leadership Team.
Risks:	The proposed Advertising and Sponsors Policy will be reviewed within the first year to gauge how the Policy is implemented in practice. The Policy will then be subject to review every three years.
Officer Contact	Barrie Walford Economic Development Manager barrie.walford@nwleicestershire.gov.uk

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North West Leicestershire District Council Advertising and Sponsorship Policy 2023

1.0 Introduction

Whenever something takes place with a significant public audience it creates an opportunity for organisations who may wish to use that opportunity to raise awareness of their brand, service, products, values or opinions.

Public bodies such as councils should recognise that they naturally attract significant public audience to much of their activity and potentially are seen as a significant “opportunity” by organisations seeking to raise their own profile. These organisations may look for both simple means to exploit the council’s profile (advertising) or a slightly more sophisticated approach in the form of alignment by sponsorship.

The benefit to the Council of operating an advertising and sponsorship policy is that it can provide additional resource with which to support the delivery of services.

This policy document has been designed to support North West Leicestershire District Council (the Council) to take a consistent and corporate approach to securing advertising and sponsorship of council activities.

The policy can be used both reactively (where the Council is approached by a third party wanting to advertise with or sponsor council activity), or proactively (where a service wishes to increase its budget to deliver an activity by selling advertising or sponsorship opportunities).

The opportunity of advertising or sponsorship, both reactive or proactive, will be listed on the council’s website and be accessible to potential advertisers and sponsors.

This policy sets out the Council’s definition of advertising and sponsorship and the terms upon which advertising and sponsorship may be sought and accepted by the council.

2.0 Purpose

This Policy aims to:

- Maximise the opportunities to attract commercial sponsorship and advertising for appropriate council events, campaigns, or initiatives.
- Identify the types of sponsorship, advertising and support that are appropriate for council activities.
- Make sure that a consistent and professional approach is adopted to the development of advertising and sponsorship agreements.
- Make sure that the council’s reputation is adequately protected and not brought into disrepute.
- To provide fair opportunity to all potential sponsors without bias or favouritism.
- Ensure accountability and transparency of decision making.

3.0 Definition of ‘Advertising’

‘Advertising’ – is a contract between parties promoting a product (or service) to potential and current customers. Advertising is typically displayed on signs, brochures, websites, direct mailings, social media, or email messages etc.

The Council abides by national guidance published by the **Advertising Standards Agency (ASA)** – the UK’s independent regulator of advertising across all online and offline media.

The central principle of all advertising is that it should be legal, decent, honest, and truthful.

The Council abides by the **Town and Country Planning Act 1990**. The Control of Advertisement Regulations provides the rules on displaying advertising. The Council has a duty to ensure that advertising complies with this legislation.

4.0 Definition of ‘Sponsorship’

‘Sponsorship’ - is a contract between parties in which one party contributes to all or part of the delivery of a project or activity, usually in exchange for commercial benefit.

This could include financial contributions or value in kind.

Sponsorship is a significant business activity and companies seek sponsorship opportunities for a variety of legitimate business reasons including:

- to raise the company’s image and public profile
- to improve public/community relations and instil goodwill
- to show creativity and public spirit
- to generate public exposure and media coverage
- to differentiate the company from its competitors
- to increase profits/market share.

Sponsorship is not a way for any company or organisation to be viewed favourably by the Council in any other business arrangements they might be a party to.

5.0 General Principles.

North West Leicestershire District Council will welcome all opportunities to work with individuals, companies or organisations who wish to sponsor council activities where such arrangements support the council’s [core values](#).

Examples of ‘acceptable’ advertising or sponsorship

The Council can recognise advertisers and sponsors in several ways. The extent of such recognition **shall** be commensurate with the level and nature of the advertising and/or sponsorship provided. The Council shall retain full discretion as to the recognition attributed to the advertiser or sponsor.

Advertising and sponsorship recognition **shall** be tasteful and must not create situations of potential embarrassment or criticism of the Council. Such forms of recognition can include, but are not limited to:

- a) appropriate signage;

- b) media release acknowledging the role and contribution of the sponsor, invitations to selected council functions, which may include hospitality, preferential seating, presentation of an award etc.
- c) inclusion of sponsor's name and logo on council publications and other external publications;
- d) naming rights for an event, building etc. for the term of the sponsorship;
- e) an award or trophy struck in the sponsor's name and publicly presented;
- f) merchandising of goods at selected points of sale;
- g) displays in council buildings/facilities
- h) an opportunity for the sponsor's name and/or logo to be promoted through appropriate general advertising by the council;
- i) print advertising campaign to acknowledge major sponsors.

Examples of 'unacceptable' advertising or sponsorship

The Council will not enter into an advertising or sponsorship agreement if, in the opinion of the Council, the agreement:

- may be perceived as potentially influencing the council, it's officers or members in carrying out their functions.
- **Is in advocacy, or opposition to, any political party.**
- aligns the Council with any organisation or individual which conflicts with its values and priorities.

The industry categories that are not acceptable for entering into an advertising or sponsorship agreement can include, but are not limited to:

- Tobacco/cigarettes/vaping
- Alcohol
- Gambling (excluding lotteries supporting local good causes)
- Adult-oriented products/services
- Armaments
- Petrochemical Industry
- Payday Loans

Furthermore, the Council will not enter into sponsorship or advertising agreements with:

- Parties who do not comply with this advertising and sponsorship policy or the [Advertising Standards Authority code of practice](#).
- Parties in dispute with the Council or where there is pending/active legal action.
- Parties who are in contract negotiation with the Council where, in the opinion of the council, this may be viewed as an endorsement of said contract.
- Parties with a political purpose, including pressure groups or where the purpose of the advertising or sponsorship is to further a political purpose, view, or ideology.
- Parties involved in racial or sexual prejudice or discrimination on the basis of any protected characteristic.

- Parties through which, in the council's opinion, their operations are involved in any illegal or immoral activities.
- Any party where an agreement will damage the reputation of the council.

The above lists are not exhaustive, and the Council retains the absolute right to decline advertising or sponsorship opportunities (including through third party suppliers) from any organisation or individual which the Council in its sole and absolute discretion considers inappropriate.

Mandatory Requirements

All advertisements and sponsorships arrangements placed by third parties at council events or on council property, **will be in the form of the written agreement** annexed to this policy which is compliant with the principles and procedures outlined in this policy.

Consideration given to the establishment of sponsorship agreements shall have regard to the following principles:

- The type or form of advertising or sponsorship is consistent with the key aims or values of the council.
- There **shall** be no conflict between the vision and key aims of the Council and those of the advertiser or sponsor.
- The advertising or sponsorship is not perceived to influence or hinder how the Council operates.
- It does not impose or imply conditions that would limit or appear to limit the council's ability to carry out its functions fully or impartially.
- It does not compromise the reputation, constitution, and credibility of the council.
- It is not viewed as product endorsement.
- The advertising or sponsorship **shall** make a net positive contribution to the finances of the council.
- Where the potential sponsor or advertiser has other links to the Council there must be no conflict of interest.

The Council is not able to offer advertising or sponsorship opportunities to individuals or organisations who are:

- The subject of a current planning application to the council,
- The subject of any form of enforcement action by the council,
- Subject to regulation or inspection by the council, or
- Where there is an identifiable conflict of interest.

6.0 Seeking Advertising or Sponsorship

Opportunities for advertising or sponsorship may come from Officers, Members, or the potential advertiser / sponsor.

Before any advertising or sponsorship is sought the relevant Head of Service must consider whether advertising / sponsorship is appropriate in the situation and whether the “Mandatory Requirements” as set out in this document can be met.

Advertising or sponsorship **will** be sought by placing details of the Council activity that may be suitable for sponsorship or as an advertising opportunity on the council’s website. Details provided **shall** include:

- A description of the event or opportunity
- When the opportunity will begin
- The potential audience
- How long the opportunity might last.
- Officer contact details
- Whether or not the opportunity is exclusive to just one organisation

All potential advertisers and sponsors must be referred to this policy for guidance.

7.0 Considering Requests to Advertise or Sponsor

All advertising or sponsorship proposals received must be reported to the relevant Head of Service.

Where more than one request to advertise or sponsor a specific council activity is received, consideration **shall** be given as to whether multiple advertisers / sponsors are appropriate or whether the opportunity needs to be exclusive. If the opportunity is considered exclusive, then the Head of Service will need to select one advertising / sponsorship offer and reject the others. Notes **shall** be kept detailing how the decision was made.

All parties **will** be contacted and advised of the outcome.

8.0 Awarding Advertising or Sponsorship

Where more than one organisation responds to or proposes an advertising or sponsorship opportunity, the Head of Service shall consider the following when making a decision:

- Sponsorship value (monetary or value in kind)
- Relevance of each organisation
- Location

9.0 Advertising and Sponsorship Agreements

All advertisement and sponsorship arrangements will not be deemed agreed until in the form of a written agreement that has been approved by the relevant Head of Service.

Advertising and sponsorship agreements will be referred to Legal and Financial Services for review prior to signing.

The agreement shall take the form of the template annexed to this Policy. The Agreement shall be in line with this policy and have regard to public accountability and transparency, including clear statements of:

- Parties - The agreement must be clear as to the parties involved including full contact details and a named point of contact.
- Details - The details, terms and value of the advertisement or sponsorship must be clearly set out.
- Advertiser/sponsor's obligations - The requirements/expectations of the advertiser/sponsor.
- The council's obligations - The requirements/expectations of the team, department or service area seeking sponsorship.
- Outcomes - The agreement **will** set out the objectives and benefits to be achieved.
- Length of advertising / sponsorship agreement - The duration of the advertisement / sponsorship agreement needs to be agreed between all parties.
- Declaration – Potential advertisers and sponsors are required to declare in advance if they have any personal interests, involvement, or potential conflict of interest with any council officers or elected members.
- Assessment of risk - Each advertising or sponsorship proposal will be subject to a risk assessment.

10.0 Working with Council Branding

The Council will make every effort to ensure that organisations engaging in advertising or sponsorship with the Council and its activities are provided with recognition and promote their brand or identity, subject to the following principles:

- The use of branding and logos of any sponsoring company must not interfere with the council's Corporate Identity Policy or Brand Guidelines.
- The size and positioning of sponsors' logos on any promotional material, goods or signage must be considered in conjunction with the council's Communications team.
- In the case of sponsorship, the Council will have the rights of approval on all appropriate sponsorship related activity, such as:
 - Use of the Council Intellectual Property (trademark and logos), which includes council owned venues, events, programmes etc.
 - Publicity and promotion of the sponsorship in sponsor's own advertising, media, and marketing materials, including in digital and social media.
 - Appropriate sponsor events at council-owned venues
 - All sponsorship activity and activation programmes will be agreed between the sponsor and council prior to implementation.

11.0 Monitoring and Review

It is possible during the agreement that circumstances and the values of one or more of the parties may change, meaning that the relationship is no longer appropriate. To accommodate

such circumstances the Council will regularly monitor and review its advertising and sponsorship arrangements.

Annually each advertising and sponsorship agreement will be reviewed to check for the possibility of a conflict of interest and may be refused or terminated in any case where during the life of the sponsorship the sponsor:

- a) Has a current development application, licensing application or planning matter before the council, or the Council is aware of the possibility of an application or matter coming before the Council in the near future;
- b) is, or is likely to be, subject to regulation, inspection or enforcement action by the Council which may impose or imply conditions; and where the sponsorship may limit the council's ability to carry out its functions fully and impartially.

The Council will keep a register of all advertising and sponsorship agreements. The register will be a publicly accessible document.

12.0 Disclaimer

Acceptance of advertising or sponsorship does not imply endorsement of products and services by North West Leicestershire District Council.

The Council reserves the right to withdraw advertising or sponsorship with no guarantee of refund at any time to meet the demands of unexpected circumstances.

This includes:

- Force majeure (i.e. major environmental events)
- Periods of heightened sensitivity and/or developments following the installation of advertising (i.e. an external event deemed previously acceptable advertising in bad taste).

Advertisers and sponsors would be informed of such circumstances at the earliest available opportunity.

13.0 Review

This policy document will be reviewed every three years.

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DATED

20[]

(1) NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

AND

(2) [SPONSOR NAME]

SPONSORSHIP AGREEMENT

(1) SPONSORED PARTY DETAILS	
Name:	NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL
Address:	Whitwick Business Centre, Stenson Road, Coalville LE67 4JP
[Sponsored Party's Representative:]	Name: [NAME] Title: [TITLE] Email: [EMAIL] Telephone: [NUMBER] Postal Address: [POSTAL ADDRESS]
(2) SPONSOR DETAILS	
Name:	[SPONSOR'S NAME]
Address:	[ADDRESS]
Company Number:	[COMPANY NUMBER]
[Sponsor's Representative:]	Name: [NAME] Title: [TITLE] Email: [EMAIL] Telephone: [NUMBER] Postal Address: [POSTAL ADDRESS]
SCHEDULES INCLUDED IN THIS AGREEMENT	
Schedule 1	Terms and Conditions of Sponsorship Agreement
Schedule 2	Risk Assessment

This agreement is entered into on the date set out above and is made up of this Agreement and the Schedules stated above.

Signed for and on behalf of **North West Leicestershire District Council**

Name and position:

[insert name]

[insert job title]

Signature:

.....

We accept the terms set out in this Agreement including Schedules stated above.

Signed for and on behalf of **[insert name of Supplier]**

Name and position:

[insert name]

[insert job title]

Signature:

.....

Schedule 1

TERMS AND CONDITIONS OF SPONSORSHIP AGREEMENT

1. INTERPRETATION:

“Funds”	means the designated purpose for which the Sponsorship Value will be utilised by the Sponsored Party.
“Party”	means the Sponsor or the Sponsored Party (as appropriate) and “Parties” shall mean both of them.
“Risk Assessment”	means the evaluation of potential risks associated with this sponsorship, including the identification and mitigation of such risks.
“Sponsorship Agreement” or “Agreement”	means the contract between (i) the Sponsor and (ii) the Sponsored Party constituted by the Sponsored Party’s countersignature of the Agreement and includes the Agreement and Schedules.
“Sponsorship Value”	means the value of the financial support provided by the Sponsor to the Sponsored Party, specifically [£xxx (x hundred pounds and x pence)].

1.2 In these terms and conditions, unless the context otherwise requires:

- 1.2.1 references to numbered clauses are references to the relevant clause in these terms and conditions;
- 1.2.2 any obligation on any Party not to do or omit to do anything shall include an obligation not to allow that thing to be done or omitted to be done;
- 1.2.3 the headings to the clauses of these terms and conditions are for information only and do not affect the interpretation of the Agreement;
- 1.2.4 the word ‘including’ shall be understood as meaning ‘including without limitation’.

2. DEFINITION OF SPONSORSHIP

2.1 Sponsorship’ is a contract between parties in which one party contributes to all or part of the delivery of a project or activity, usually in exchange for commercial benefit. This could include financial contributions or value in kind.

2.2 This Sponsorship Agreement is not a way for the Sponsor to be viewed favourably by the Sponsored Party in any other business arrangements they might be a party to.

3. TERM AND DETAILS OF THE SPONSORSHIP:

3.1 This Sponsorship Agreement shall commence on the [add date] and terminate [X] months thereafter.

3.2 The Sponsor agrees to provide sponsorship to the Sponsored Party in relation to [INSERT NATURE OF SPONSORSHIP]. The specific sponsorship details are as follows:

3.2.1 Location: [Location – if applicable]

3.2.2 Description: [Description]

3.2.3 Purpose: [INSERT DETAILS]

3.3 The Sponsor agrees to pay the Sponsorship Value, in accordance with clause 1 to the Sponsored Party for the sponsored [INSERT]. The Sponsored Party agrees that the Funds received under this Agreement will be used in accordance with clause 5.

4. SPONSORSHIP REQUIREMENTS AND EXPECTATIONS:

4.1 The Sponsor agrees to:

4.1.1 Provide the Sponsorship Value as agreed in clause 1 to the Sponsored Party.

4.1.2 [Include any additional obligations or expectations of the Sponsor]

5. SPONSORED PARTY'S OBLIGATIONS:

5.1 The Sponsored Party agrees to:

[Insert / remove provisions below as relevant]

5.1.1 Use the Sponsorship Value paid in accordance with this agreement for [INSERT].

5.1.2 [At the sole determination of the Sponsored Party, provide recognition to the Sponsor's support by placing a prominent sign or plaque acknowledging the sponsorship, and attributing the Sponsor's name.]

5.1.3 [At the discretion of the Sponsored Party, acknowledge the sponsorship by inserting a place on the Council's website at <https://www.nwleics.gov.uk/> attributing the Sponsor's name.]

5.1.4 [At the discretion of the Sponsored Party, provide the Sponsor with periodic updates on the use and status of the sponsorship.]

5.1.5 [Include any additional obligations or expectations of the Sponsored Party]

6. PAYMENT OF SPONSORSHIP VALUE

The Sponsor accepts the risks and obligations as set out in this agreement and as such, shall not be entitled to any refund of the Sponsorship Value once this agreement takes effect. Once paid, the Sponsorship Value shall be non-refundable.

7. OBJECTIVES AND BENEFITS:

7.1. Objectives: The Objectives of this sponsorship agreement are to [INSERT].

7.2. Benefits: The Parties recognise that this sponsorship will benefit the community by [INSERT].

8. DURATION:

This Agreement shall be effective as of the Start Date written above and shall remain in effect for a period of [12 months] unless otherwise terminated or extended by mutual agreement of the Parties.

9. DECLARATION OF CONFLICTS OF INTEREST:

9.1 Both Parties acknowledge that by entering into this Agreement, there should be no conflict between the key aims and core values of the Council and those of the Sponsor.

9.2 The Sponsor agrees to this agreement being reviewed by the Council annually to check for the possibility of a conflict of interest.

9.3 By signing this agreement, the Sponsor hereby declares that it does not have any personal interests, involvement, or conflicts of interest with the Council, its Officers or Elected Members that may compromise the impartiality and integrity of this sponsorship.

9.4 If any potential or actual conflicts of interest arise during the term of this Agreement, the Sponsor shall promptly disclose them in writing to the Sponsored Party setting out the details of such conflict. The Sponsored Party shall then have sole discretion to determine as to whether the Agreement shall continue.

9.5 The Sponsored Party shall have full discretion to refuse or terminate this Sponsorship Agreement where, during the term of this Agreement, the Sponsor:

9.5.1 Has a current development application, licensing application or planning matter before the Sponsored Party, or the Sponsored Party is aware of the possibility of an application or matter coming before it in the near future;

9.5.2 Is, or is likely to be, subject to regulation, inspection or enforcement action by the Sponsored Party which may impose or imply conditions; and where the Sponsorship Agreement may limit the Sponsored Party's ability to carry out its functions fully and impartially.

9.5.3 Is in dispute with the Sponsored Party or where there is pending or active legal action.

9.5.4 Is in contract negotiation with the Sponsored Party where this Agreement may be viewed as endorsement of such contract.

10. RISK ASSESSMENT:

10.1 The Parties acknowledge the importance of conducting a Risk Assessment related to this sponsorship. The Risk Assessment as set out in Schedule 2 will be completed by both Parties within [Specify Timeframe] from the effective date of this Agreement.

10.2 The purpose of the risk assessment is to identify, evaluate, and mitigate any potential risks that are associated or may arise within the context of this Agreement.

11. TERMINATION

11.1 Either Party may terminate this Agreement in whole at any time by notice in writing to the other party to take effect on any date falling at least working days later than the date of service of the relevant notice.

11.2 The Sponsor may at any time by notice in writing to the Sponsored Party request that any sponsorship recognition attributed to the Sponsor may be removed and/or taken down.

11.3 The Sponsored Party may terminate this Agreement in accordance with clause 9.5.

12. FORCE MAJEUR

Neither Party shall have any liability under or be deemed to be in breach of the Agreement for any delays or failures in performance of the Agreement which result from circumstances beyond the reasonable control of the Party affected. Each Party shall promptly notify the other Party in writing when such circumstances cause a delay or failure in performance and when they cease to do so. If such circumstances continue for a continuous period of more than two months, either Party may terminate the Agreement by written notice to the other Party.

13. DISCLAIMER:

13.1 Acceptance of this sponsorship does not imply endorsement of products and services by Sponsored Party.

13.2 The Sponsored Party reserves the right to withdraw this sponsorship with no guarantee of refund at any time to meet the demands of unexpected circumstances. This includes, but is not limited to:

13.2.1 Force majeure, as explained at clause 12.

13.2.2 Periods of heightened sensitivity and/or developments following the recognition of the sponsorship.

14. MONITORING AND REVIEW:

Parties acknowledge that it is possible during the currency of this Agreement that circumstances and the values of one or more of the Parties may change, meaning that the relationship is no longer appropriate. To accommodate such circumstances the Sponsored Party will regularly monitor and review this arrangement.

15. GOVERNING LAW:

The validity, construction and performance of the Agreement, and all contractual and non-contractual matters arising out of it, shall be governed by English law and shall be subject to the exclusive jurisdiction of the English courts to which the Parties submit.

16. ENTIRE AGREEMENT:

This Agreement constitutes the entire understanding between the Parties, supersedes all prior or contemporaneous agreements or understandings, and may only be amended in writing and signed by both Parties.

Schedule 2
Risk Assessment

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