



Housing Management and Almshouses Sub (Community and Children's Services) Committee

Date: THURSDAY, 25 SEPTEMBER 2014
Time: 11.30 am
Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL

Members: Virginia Rounding (Chairman)
Revd Dr Martin Dudley (Deputy Chairman)
Deputy Billy Dove
Alderman David Graves
Deputy the Revd Stephen Haines
Ann Holmes
Deputy Henry Jones
Gareth Moore
Dhruv Patel
Adam Richardson
Elizabeth Rogula

Enquiries: Philippa Sewell
tel. no.: 020 7332 1426
philippa.sewell@cityoflondon.gov.uk

Lunch will be served in the Guildhall Club at the rising of the Sub Committee

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Reports

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To approve the public minutes and non-public summary of the meeting on 10 July 2014.

For Decision
(Pages 1 - 4)
4. **SMOKEFREE CHILDREN'S PLAYGROUNDS**
Joint report of the Director of Community and Children's Services and the Director of Open Spaces.

For Information
(Pages 5 - 16)
5. **ANTI-SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014**
Report of the Remembrancer.

For Information
(Pages 17 - 20)
6. **SOCIAL HOUSING TENANCY FRAUD, ANTI-FRAUD & PROSECUTION POLICY**
Report of the Chamberlain.

For Information
(Pages 21 - 32)
7. **HOUSING & HEALTH - A REPORT ON HEALTH-RELATED ACTIVITIES AND PLANS IN THE CITY'S SOCIAL HOUSING ESTATES**
Report of the Director of Community and Children's Services.

For Information
(Pages 33 - 40)
8. **REDUCTION IN EXTERNAL FUNDING TO ALMSHOUSES RESIDENTS**
Report of the Director of Community and Children's Services.

For Decision
(Pages 41 - 44)
9. **CITY OF LONDON ALMSHOUSES UPDATE**
Report of the Director of Community and Children's Services.

For Decision
(Pages 45 - 48)
10. **REVIEW OF HOUSING SERVICE'S COMPLAINTS POLICY**
Report of the Director of Community and Children's Services.

For Decision

11. **SHELTERED HOUSING REVIEW**
Report of the Director of Community and Children's Services.
For Decision
(Pages 71 - 90)
12. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
13. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
14. **EXCLUSION OF THE PUBLIC**
MOTION - That under Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Paragraph 3 of Part I of Schedule 12A of the Local Government Ac.

Part 2 - Non-Public Reports

15. **NON-PUBLIC MINUTES**
To approve the non-public minutes of the meeting held on 10 July 2014.
For Decision
(Pages 91 - 92)
16. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
17. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

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HOUSING MANAGEMENT AND ALMSHOUSES SUB (COMMUNITY AND CHILDREN'S SERVICES) COMMITTEE
Thursday, 10 July 2014

Minutes of the meeting of the Housing Management and Almshouses Sub (Community and Children's Services) Committee held at Committee Rooms, West Wing, Guildhall on Thursday, 10 July 2014 at 1.45 pm

Present

Members:

Virginia Rounding (Chairman)
Revd Dr Martin Dudley (Deputy Chairman)
Deputy Billy Dove
Deputy the Revd Stephen Haines
Ann Holmes
Gareth Moore
Dhruv Patel
Elizabeth Rogula

Officers:

Eddie Stevens	-	Community & Children's Services
Jacque Campbell	-	Community & Children's Services
Karen Tarbox	-	Community & Children's Services
Simon Cribbens	-	Community & Children's Services
Amy Carter	-	Community & Children's Services
Mark Jarvis	-	Chamberlain's Department
Philippa Sewell	-	Town Clerk's Department

1. **APOLOGIES**

Apologies were received from Alderman David Graves and Deputy Henry Jones.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

Mr Gareth Moore declared an interest in housing matters as a tenant of Golden Lane Estate.

3. **MINUTES**

RESOLVED – That the public minutes and non-public summary of the meeting held on 22 May 2014 be approved as a correct record, subject to the correction of two formatting errors.

Matters Arising

Emergency Access to Tower Blocks

Officers reported that discussions were ongoing and the report was deferred until the Sub Committee's meeting in September 2014.

Christmas Hampers

Officers reported that giving vouchers rather than goods might affect the benefit status of Almshouses residents but, at the request of the Sub Committee, officers undertook to investigate further.

Health and Wellbeing Events

Members noted that the report regarding Health and Wellbeing events on Estates would be presented at the Sub Committee meeting in September.

Draft Asset Management Strategy

Officers reported that this was now able to be discussed in Public session. Members were advised that public consultation would begin next week.

4. HRA - OUTTURN 2013/14

Members received a joint report of the Chamberlain and the Director of Community and Children's Services which compared the outturn for the Housing Revenue Account (HRA) in 2013/14 with the final agreed budget for the year. Officers reported that the total net transfer to reserves for the year was £0.910m, against the final agreed budget of £0.541m. This represented a reduced requirement of £0.369m due to a better performance on rent collection than had been expected. Members noted a £0.183m reduction in the requirement from the Major Repairs Reserve, which was largely due to the re-phasing of capital projects.

In response to a Member's question concerning the benefits changes, officers advised that, in addition to those put into collection, extra resources had been put into services regarding debt prevention and money management. Members queried the overspend on heating, and officers responded this was due to increasing in energy costs, which were anticipated to outstrip rent in the next five years. Members were advised that this was one of the aspects covered in the Asset Management Strategy.

RESOLVED – That the report be noted.

5. RESIDENT COMMUNICATIONS & ENGAGEMENT REVIEW & DRAFT STRATEGY

Members received a report and a presentation of the Director of Community and Children's Services which outlined the review of Resident Communications & Engagement and the changes implemented as a result, and a draft Resident Communications & Engagement Strategy.

Members discussed the Strategy and the attendance of Members at tenants' meetings, noting that Ward and Allocated Members were welcome, provided the meetings remained solely for discussion of landlord issues with tenants and leaseholders. In response to a Member's question regarding the safeguards for community grants, officers advised that proof of spending was required. Any individual or group could apply, and notice would be given in estate newsletters when a grant was approved. In response to a Member's query, officers reported that, in addition to the Housing User Board (HUB), Estate Facebook pages were being set up with the aim to be as inclusive as possible.

RESOLVED – That:

- (a) The draft Resident Communications and Engagement Strategy be agreed in principle;
- (b) A detailed list of findings and actions from the review and links to the Estate Facebook pages be circulated electronically to Members; and
- (c) The report be noted.

6. HORACE JONES HOUSE - LOCAL LETTINGS POLICY

Members received a report of the Director of Community and Children's Services seeking approval for a Local Lettings Policy for the allocation of homes at Horace Jones House. Members queried the request for Delegated Authority and were advised it was in case of minor changes occurring outside of the meeting schedule.

RESOLVED – That:

- (a) The Local Lettings Policy of Horace Jones House be approved; and
- (b) Authority to approve minor changes that may be required be delegated to the Director of Community and Children's Services in consultation with Chairman.

7. GATEWAY 3/4 OPTIONS APPRAISAL - DOOR ENTRY SYSTEMS AT THE GOLDEN LANE (PARTIAL), HOLLOWAY AND YORK WAY ESTATES

RESOLVED – That Option 1, proceeding to procurement and Gateway 5 with refurbishment of the existing door entry systems with like-for-like functionality (therefore, audio-visual functionality at Golden Lane Estate and audio functionality at Holloway and York Way Estates) and a budget of £472,015.10 be recommended for approval by Projects Sub Committee.

8. DECENT HOMES WORKS TO PROPERTIES PREVIOUSLY OMITTED FROM PROGRAMMES - GATEWAY 3/4 OPTIONS APPRAISAL

RESOLVED – That Option 2, proceeding to Gateway 5 completing works as required throughout the 3 financial years and a budget of £500,000 from the Housing Revenue Account (HRA) be recommended for approval by Projects Sub Committee.

9. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

There were no questions.

10. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

The following items of business were raised:

Bernard Morgan House

The Policy Development Manager for Housing and Social Care reported that Police officers in Bernard Morgan House had been given notice to leave, and officers were now meeting with the City of London Police to understand the details and whether the Corporation had a duty to house or advise them. In response to Members' questions, it was noted that Bernard Morgan House was not used for Social Housing, and that it was being sold off as part of the Police Accommodation Review.

Resident Celebration Day and Almshouses Christmas Hamper visit

The Chairman reminded Members that the Resident Celebration Day was scheduled for 18th October 2014, and the Christmas Hamper visit to the Almshouses was scheduled for the morning of 10th December.

Vote of Thanks

The Housing Management and Almshouses Sub Committee formally recorded their thanks and appreciation to the Housing and Technical Services Director for his exemplary service to the Corporation's Housing Policy, and wished him well for the future. The Director responded, thanking Members for their treatment and praising the quality, leadership and passion of Housing officers.

11. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Local Government Act.

Item	Paragraph
12-13	3
14-15	-

12. **NON-PUBLIC MINUTES**

RESOLVED – That the non-public minutes of the meeting held on 22 May 2014 be approved as a correct record.

13. **HOLLOWAY ESTATE REWIRING OR LANDLORDS; AND TENANTS SERVICES - GATEWAY 3/4 OPTIONS APPRAISAL**

The Sub Committee received a report of the Director of Community and Children's Services.

14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

There were no non-public questions.

15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREE SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There was no other business.

The meeting ended at 2.32 pm

Chairman

Contact Officer: Philippa Sewell
tel. no.: 020 7332 1426
philippa.sewell@cityoflondon.gov.uk

Agenda Item 4

Committee(s):	Date(s):
Health and Wellbeing Board	- For information 30 May 2014
Open Spaces City Gardens Committee	- For decision 2 June 2014 For information
Community and Children's Services Committee	- 13 June 2014 For decision
Housing Sub Committee	- For information 25 September 2014
Subject: Smokefree Children's Playgrounds	Public
Report of: Director of Community and Children's Services/Director of Open Spaces	For Information
Summary	
<p>This report presents the proposal of implementing voluntary no smoking codes within children's playgrounds, for a trial period of six months, in four identified areas in the City:</p> <ul style="list-style-type: none">○ Middlesex Street estate○ Tower Hill Gardens○ Portsoken Street○ West Smithfield Rotunda Garden <p>The key aim of smokefree children's playgrounds is to deter children and young people from smoking. The objectives include to:</p> <ul style="list-style-type: none">○ Reduce child exposure to smoking and help to decrease the number of young people starting to smoke○ Decrease cigarette litter such as cigarette ends, empty packets and wrappers to playgrounds more pleasant and to protect wildlife.○ Reduce the risk of children putting toxic cigarettes ends into their mouths <p>A consultation exercise has been carried out with the public and Friends of City Gardens, which evidenced support for this initiative.</p>	
Recommendation(s)	
Members are asked to:	
<ul style="list-style-type: none">● Agree the smokefree children's playgrounds' proposal in principle● Agree the four playgrounds where the proposal should be implemented for a trial period.	

Main Report

Background

1. The Healthy Lives, Healthy People: A Tobacco Control Plan for England, published in 2011 described what the Government would do to reduce tobacco use over the next five years.¹ In the plan, support is given to local communities and organisations who want to go further than the requirements of smokefree laws in creating environments free from second hand smoke, for example, in children's playgrounds, outdoor parts of shopping centres and venues associated with sports and leisure activities.
2. An increasing number of Councils in the UK are creating smokefree playgrounds. The usual mechanism is by using voluntary codes; although some Councils are considering whether seeking local regulatory powers would be practicable.
3. The benefits of stopping smoking in playgrounds have been identified as follows²:
 - To support the denormalisation of smoking
 - To reduce the risk of exposure to second hand smoke
 - To reduce smoking-related litter and the threat of cigarette ends, which are non-biodegradable and toxic to children, wildlife and the environment
 - To reduce fire risk
 - To offer the potential for increased use of parks and recreation areas
4. Children become aware of cigarettes at an early age. Three out of four children are aware of cigarettes before they reach the age of five, irrespective of whether or not their parents' smoke. However, if young people see smoking as a normal part of everyday life, they are more likely to become smokers themselves.³
5. Denormalisation of smoking is a phrase used in tobacco control to refer to the breaking down of community acceptance and tolerance for smoking.⁴ Children, it is argued, are greatly influenced by their sense of what is normal and attractive, which is in turn influenced by the imagery and social meaning attached to different behaviours portrayed in media and youth culture.⁴
6. Measures which discourage the use of tobacco in premises covered by smokefree legislation and prevent smoking activity in outdoor settings, such as play areas, by means of codes or norms also have a denormalising affect by reducing the exposure that children have to smoking.

¹ HM Government (2011) The Healthy Lives, Healthy People: A Tobacco Control Plan for England.

² UK Healthy Cities Network (2012) The case for smokefree children's play areas. Available at: www.healthycities.org.uk/uploads/files/network_briefing_smokefree_childrens_play_areas_v2.pdf

³ Office for National Statistics (1997), Teenage smoking attitudes in 1996.

⁴ Hastings G and Angus K (2008), Forever cool: the influence of smoking imagery on young people. Available at: www.management.stir.ac.uk/about-us/?a=19777

Current Position

7. The City Tobacco Control Alliance meets quarterly and is responsible for overseeing a range of work streams delivering the Corporation's tobacco control priorities.
8. There are different work streams of the Alliance, two of which are to denormalise smoking and to prevent young people from starting to smoke.
9. Currently all playgrounds in the City permit smoking as they are not included within the national smokefree legislation.
10. The Alliance has identified four possible playgrounds where a voluntary code could be implemented. These playgrounds are located in:
 - a. Middlesex Street Estate
 - b. Tower Hill Gardens
 - c. Portsoken Street
 - d. West Smithfield Rotunda Garden
11. The public, residents of Middlesex Street Estate and Friends of City Gardens have been consulted on the proposals, full details in Appendix 1 and 2.
12. Implementation and communication of the proposal was discussed with the Area Manager of Middlesex Street Estate. A briefing note was posted to all residents of Middlesex Street estate detailing the proposal and asking for comments. Details were also posted on their Facebook page. No feedback has been received.
13. The Friends of City Gardens are in general favour of the proposal, however they do have some concerns; enforcement, appropriate signage and removal of litter bins. They also suggest that gardens heavily used by City workers or visitors would be better placed to implement this proposal.
14. The City Gardens Support Services Officers assisted completion of questionnaires to users in the three identified gardens. 27 questionnaires were completed. The majority of respondents are in favour of voluntary smokefree children's playgrounds, but did note issues with enforcement.
15. 89% of respondents stated it is very important/moderately important for the City of London Corporation to prevent children being exposed to second hand smoke.
16. 85% of respondents strongly agreed/agreed on a voluntary code of not smoking within the children's playgrounds. 55% strongly agreed/agreed on a voluntary code of not smoking within the entire garden.
17. 74% of respondents strongly agreed/agreed that appropriate signage would strengthen the message.
18. Half of respondents believe a voluntary code of not smoking will reduce levels of smoking in the area, however, 37% believe it will be difficult to enforce.

Proposals

19. It is proposed that smokefree playgrounds will be implemented for a trial period of 6 months and evaluated to inform future delivery.
20. It is proposed that implementation of the smokefree playgrounds will involve:
 - a. Initial observation of smokers in the identified areas to determine a baseline for evaluation.
 - b. Development of public information resources and appropriate signage. See Appendix 3 for examples of signage.
 - c. Provision of smokefree training for gardeners and housing officers to enable them to respond to questions from the public and to signpost them to local Stop Smoking Services.
 - d. A launch of smokefree playgrounds by preparing press releases.
21. The effectiveness of the initiative is proposed to be measured by an initial observation of smokers in the identified areas before the launch of the project. This observation will be repeated after the trial period and compared.
22. The Public Health Team will work in partnership with the Area Manager for Middlesex Street Estate to ensure the initiative is communicated to all residents. Letters will be sent to all residents, as well as posters displayed in communal areas. Training of the housing officers will ensure that they are equipped to answer residents' questions.
23. This initiative will not be policed by Corporation officers. We expect it to be self policing, supported by the appropriate signage. Work elsewhere has demonstrated that smokefree outdoor areas are self-regulatory and signage acts as a simple yet powerful deterrent.

Implications

24. Financial costs related to designing and printing the signage is estimated to total approximately £500. This funding will be allocated from the Public Health budget, managed by Community and Children's Services.

Conclusion

26. Smokefree children's playgrounds are becoming increasingly common in the UK and have strong public support. The evidence from the local consultation mirrors this support. However, enforcement is deemed as an issue.
27. Smokefree children's playgrounds are an important component of tobacco control policy in helping to reduce the health and economic burden of smoking in our communities.
28. The Board are asked to agree the proposal of smokefree playgrounds, and agree which playgrounds should be identified.

Appendices

- Appendix 1 – Comments from Friends of City Gardens
- Appendix 2 – Results from public consultation
- Appendix 3 – Example of signage

Gillian Robinson

Tobacco Control Programme Manager
City and Hackney Public Health Service

T: 020 8356 2727

E: gillian.robinson@hackney.gov.uk

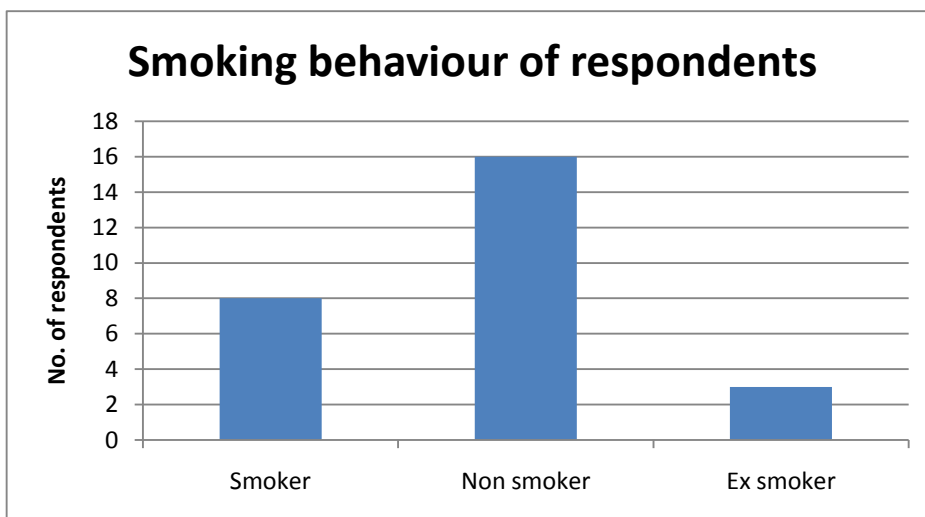
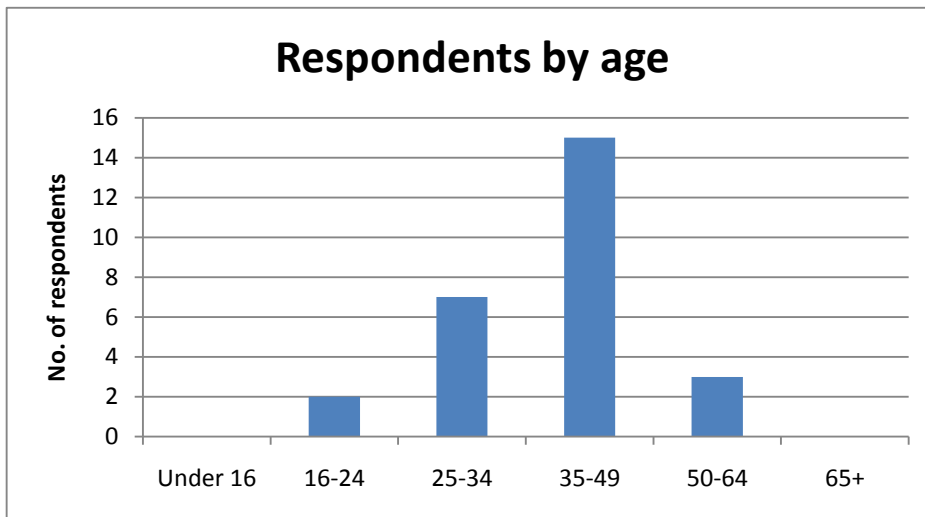
Appendix 1

Feedback from the Friends of City Gardens

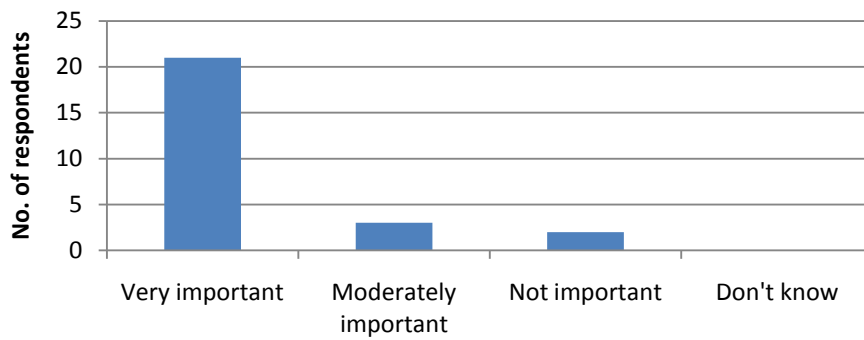
1. The three gardens selected for the trial are in socially deprived areas (Portsoken, Smithfield (close to hospital and used by rough sleepers) and Tower Hill gardens and although all 3 had children's play areas it was felt the trial would be more meaningful if it included gardens heavily used by City workers or visitors - such as Cleary or St Paul's.
2. Although banning smoking in gardens and in particular those with children's' play areas might be desirable enforcing it would be impossible.
3. More positive steps to stop smoking were generally felt to be more effective than a ban. Perhaps engagement with smokers in these gardens as part of the consultation and providing positive encouragement to stop would be more effective.
4. Using signs such as **thank you for not smoking in the children's play area** might be more effective - such as those in Fortune Park.
5. We would be concerned that if smoking was banned that smoking litter bins would be removed which would be likely to create a litter problem as people would still smoke and throw their butts on the ground and in flower beds where they are difficult to remove.
6. We would also be concerned that Smoking Ban signage could be intrusive and spoil the relaxed atmosphere of the gardens.

Appendix 2

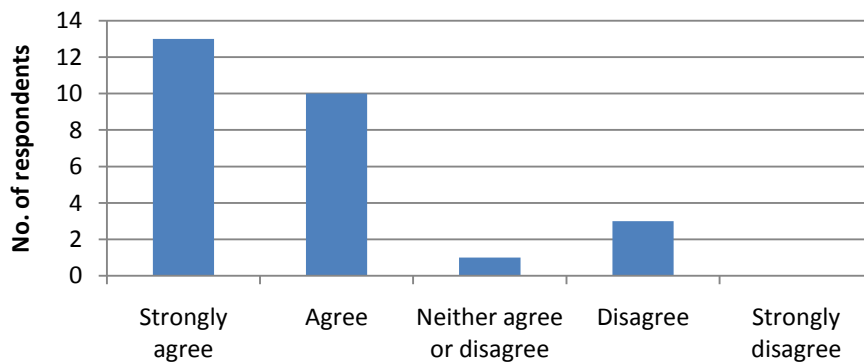
Results from public consultation



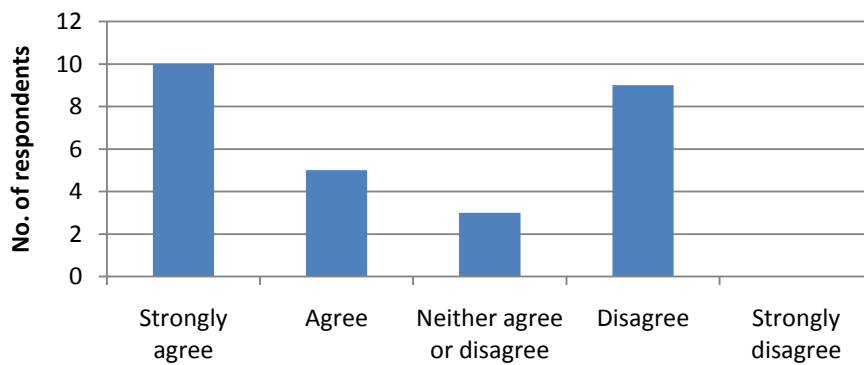
Attitudes to protecting children from secondhand smoke

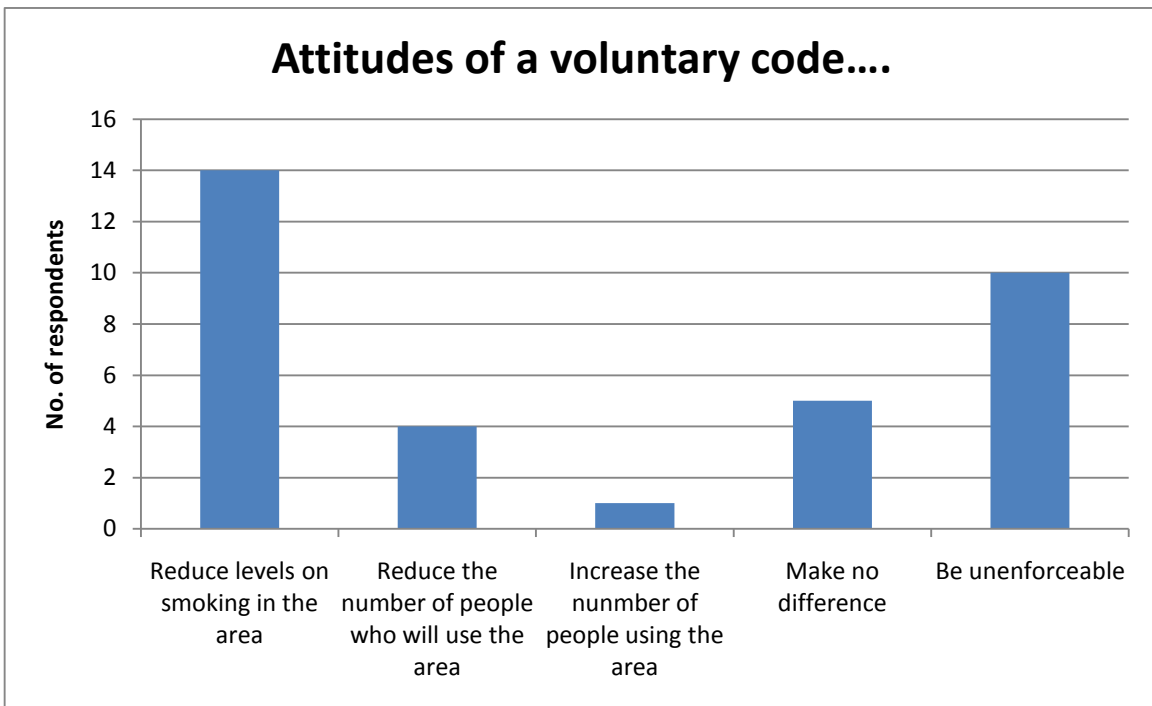
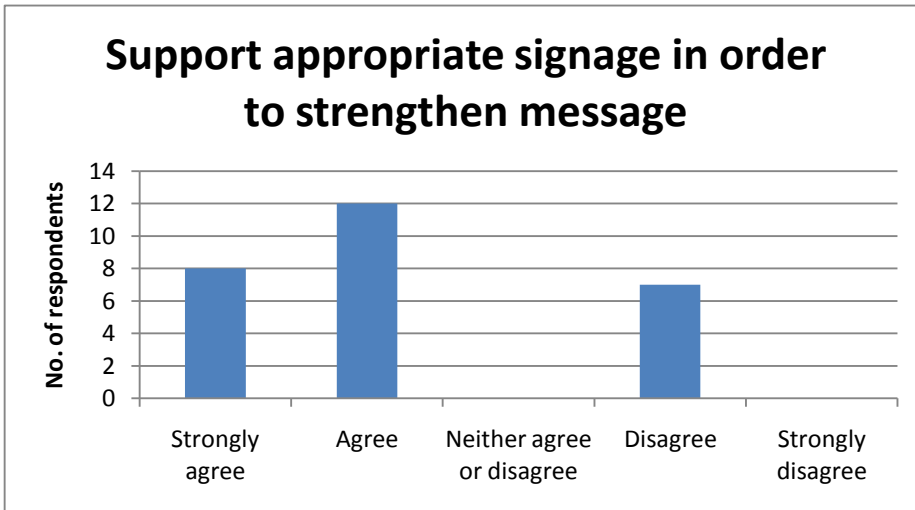


Support a voluntary code of not smoking within the immediate playground area



Support a voluntary code of not smoking within the entire park





What is your view on the CoLC creating smokefree outdoor spaces where children (under 18) are present?

- Good idea
- Good idea
- Good idea
- Good idea
- Good idea as long as there are places where people can smoke
- Agree, where there is a heavy presence of children
- Yes, good idea
- Has a duty to provide spaces that children are not subject to smoke
- There should be smokefree spaces
- Playgrounds - yes
- This park should be a no go area for smokers
- Are you addressing the core issue - air pollution

Agree but should also have places for smokers
A good thing depending upon size of space and no. of people presently smoking there
Important for children to be in a smokefree area
Support scheme
A very good project
Very sensible, a good idea. The less children are exposed to smoking and observing those smoking the better
Agree. I wouldn't smoke next to people who are eating or children.
Not supportive
Of course, good idea

Other potential smokefree areas suggested

Smoking should be banned in all outdoor parks/gardens
Building entrances
Rule should be introduced on a site by site basis
Parks only
Don't like smoking outside stations
Focus on areas where children are present
All public parks
Outside tube stations

Comments

Good idea, but right location? Bigger issue - air quality
Lots of restrictions on smokers already. Fence off play area?
How many children really use the space ratio to smoker and other users?
Smoking banned so much that it is difficult to say where it is a problem. Doorway smoking is unpleasant
Smoking ban doesn't work outside Smithfield Market
Smoking in gardens is ok if they are courteous and not sit close to others when smoking
What would stressy bankers do?
Depends on location. Usage can vary - nursery across the road use the site
Second-hand smoke has less impact in outdoor areas
No children use the park. Enough limitations on smokers already
If it's voluntary, people may not comply
A brilliant idea
Should be compulsory
What is the proposal for e-smoking? There is no secondary smoke, should it be treated differently? No, in my opinion but there is no public statement on this.

Appendix 3

Examples of signage



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Committee:	Date:
Housing Management and Almshouses Sub Committee	25 September 2014
Subject: Anti-social Behaviour, Crime and Policing Act 2014	Public
Report of: Remembrancer	For Information
<p><u>Summary</u></p> <p>This Report informs the Committee of provisions in the Anti-social Behaviour, Crime and Policing Act 2014 which affect local authority housing. The main change is the introduction of new grounds for possession in relation to secure tenancies. An absolute ground for possession will arise if the tenant or another person in the property is convicted of a serious criminal offence or is the subject of other findings relating to anti-social behaviour, where there is a sufficient connection with the premises. A discretionary ground for possession will arise where the tenant or another person in the property has caused nuisance or annoyance to the landlord, or has been convicted of involvement in a riot. Other measures introduced by the Act, such as the new Anti-social Behaviour Injunction, Community Protection Notice and Closure Order, are also of potential relevance in the context of housing.</p> <p>Recommendation:</p> <p>The Committee is invited to receive this Report.</p>	

Report

Introduction

1. The Anti-social Behaviour, Crime and Policing Act 2014 reforms the powers available to local authorities, the police and other bodies to tackle anti-social behaviour. The principal features of the legislation have been reported as indicated in the background papers noted below. This Report informs the Committee of the changes which affect local authority housing in particular. The relevant provisions will come into effect this autumn.

New grounds for possession

2. The Act strengthens the ability of local authority landlords to recover possession of dwellings from tenants who have been involved in crime or anti-social behaviour. It does so through the introduction of three new grounds for possession, one of which is 'absolute' (which means that the court must grant possession if the ground is satisfied) and two of which are 'discretionary' (which

means that the court will only grant possession if it thinks it reasonable to do so in the circumstances).

3. The absolute ground relates to convictions for serious criminal offences and other findings of anti-social behaviour. It arises if any of the following conditions is met:
 - (i) The tenant, or a person residing in or visiting the premises, has been convicted of a serious criminal offence which was committed in the locality of the premises, or against a resident of the locality, or against the tenant's landlord or the landlord's employee in relation to housing management functions. A number of offences are defined as "serious" for this purpose, including most violent and sexual offences, robbery, burglary, possession of weapons, drug-dealing, and driving offences resulting in injury to others.
 - (ii) The tenant, or a person residing or visiting in the premises, has been found by a court to have breached an Anti-social Behaviour Injunction (one of the measures introduced by the Act), where the breach was committed in the locality of the premises or where the Injunction was intended to protect residents of the locality or the tenant's landlord.
 - (iii) The tenant, or a person residing or visiting in the premises, has been convicted of breaching a Criminal Behaviour Order (one of the measures introduced by the Act), where the breach was committed in the locality of the premises or where the Order was intended to protect residents of the locality or the tenant's landlord.
 - (iv) A Closure Order (described more fully below) has been made in respect of the premises and has prohibited access to the premises for more than 48 hours.
 - (v) The tenant, or a person residing in or visiting the premises, has been convicted of breaching an abatement notice or an abatement order under the Environmental Protection Act 1990, in respect of a statutory nuisance in the form of noise emitted from the premises.
4. In order to rely on the absolute ground, the landlord must serve notice on the tenant no more than twelve months after the relevant conviction or court finding (or, in the case of a Closure Order, three months after the Order is made). The tenant will have the right to require the landlord to review its decision to seek possession, in accordance with a procedure to be laid down by the Secretary of State. The absolute ground is subject to any defence under the Human Rights Act, which may enable a tenant to argue that it would be disproportionate for the court to grant possession.
5. The first of the new discretionary grounds arises where the tenant, or a person residing in or visiting the premises, is guilty of conduct causing or likely to cause

nuisance or annoyance to the landlord or anyone employed in connection with the landlord's housing management functions. The conduct must be related to or otherwise affect those functions.

6. The second of the new discretionary grounds arises where the tenant, or an adult residing in the premises, is convicted of an indictable offence which took place during and at the scene of a riot anywhere in the United Kingdom.

Other measures

7. The new Anti-social Behaviour Injunction (which is intended as the principal replacement for the abolished 'ASBOs') will incorporate the main elements of the existing injunction of that name available to local authority and social landlords on application to the county court. A lower threshold for what counts as anti-social behaviour is retained in the context of housing (conduct causing "nuisance or annoyance" as opposed to the usual "harassment, alarm or distress").
8. The new Injunction will be more flexible than the current version, in that it may include any prohibition or requirement intended to prevent a person from engaging in anti-social behaviour, rather than simply prohibiting such behaviour outright. For instance, an individual may be required to attend substance-abuse classes or mediation sessions with neighbours. The Injunction may be used to exclude a person from his or her home, but only where there is a threat of violence or a significant risk of harm to others. The Common Council will be able to make use of the Injunction in relation to its housing inside and outside the City.
9. Other measures of potential relevance to social housing include Community Protection Notices and Closure Orders. Both will be available to the Common Council and City Police in the same way as to other local authorities and police forces.
10. Community Protection Notices will enable local authorities (within their areas) and police forces to tackle any conduct having a persistent detrimental effect on the quality of life in the locality, through a notice imposing reasonable prohibitions or requirements. For this purpose tenants (whether in social housing or privately let dwellings) will be held responsible for any conduct occurring in their homes, unless they cannot reasonably be expected to control it. Breach of a Community Protection Notice will be a criminal offence punishable with a fine or by a fixed penalty notice.
11. Closure Orders will enable local authorities and police forces, on application to the magistrates' court, to restrict or prevent access to premises (including social housing) associated with nuisance or disorder for a period of up to six months. The restriction of access could potentially include those who live in the premises.

Consultation

12. The Director of Children's and Community Services has been consulted in the preparation of this Report.

Recommendation

13. The Committee is invited to receive this Report.

Background papers:

Reports of the Remembrancer on the Anti-social Behaviour, Crime and Policing Bill:

- Police Committee, 5th July 2013;
- Policy and Resources Committee, 25th July 2013.

Contact:

Sam Cook,
Pupil Barrister (Parliamentary Affairs),
020 7332 3045,
sam.cook@cityoflondon.gov.uk.

Committee(s):	Date(s):
Audit and Risk Management Committee Housing Management & Almshouses Sub Committee	9 September 2014 25 September 2014
Subject: Social Housing Tenancy Fraud Anti-Fraud & Prosecution Policy. Delegated Authority to Authorise Proceedings	Public
Report of: Chamberlain	For Information

Summary

The City of London owns and manages in excess of 1900 social housing properties across the City of London and in six London Boroughs. City of London social housing is highly sought after and desirable to fraudsters, who can make substantial profits from unlawful sub-letting, owing to its quality and location.

The investigation of social housing tenancy fraud is undertaken by Internal Audit. In the past three reporting years 20 properties have been recovered as a direct result of investigations undertaken by this team.

No specific delegation to Officers currently exists to authorise prosecution proceedings where social housing fraud has been identified. The Comptroller & City Solicitor has a blanket delegation to issue proceedings that are in the interests of the City of London Corporation, which has been exercised in recent cases. The Chamberlain's Business Support Director and the Head of Audit & Risk Management hold a delegated authority to authorise criminal proceedings in housing benefit fraud matters, it is proposed that these same officers are given delegated authority to authorise criminal proceedings where social housing tenancy fraud is identified.

A Social Housing Tenancy Anti-Fraud & Prosecution Policy has been developed, setting out our response to tackling social housing fraud, and the actions that may be taken where social housing tenancy fraud is identified.

This Policy and proposed delegation is being presented to the following Committees for information:

1. Audit & Risk Management Committee
2. Housing Management & Almshouses Sub Committee

The Policy and proposed delegation will be presented to the Community & Children's Services Committee for decision on 10th October 2014.

Recommendations

Members are asked to:

Support and recommend for decision to the Community and Children's Services Committee the Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy and the proposed delegation to officers to authorise criminal proceedings where social housing tenancy fraud is identified.

Main Report

Background

1. The City of London Corporation owns and manages in excess of 1900 social housing properties across the City of London and in six London Boroughs - Hackney, Islington, Southwark, Tower Hamlets, Lewisham and Lambeth. Social housing is provided to eligible persons in need that could otherwise have difficulty in affording private rents or home purchase. Social housing rents in London are substantially lower than those charged for similar properties in the private sector.
2. Social Housing provided by the City of London Corporation is highly sought after, owing to the location and quality of the housing provided; this makes the City's social housing desirable to fraudsters, who can make substantial profits from sub-letting.
3. Social housing fraud investigations relate to offences including illegal sub-letting, dishonest applications for social housing, failure to use as sole or principle residence, and right to buy discount fraud.
4. In October 2013, the Prevention of Social Housing Fraud Act came in to force; this Act criminalised unlawful sub-letting, and gave additional powers to Local Authority Investigators to gather evidence from financial institutions to investigate social housing tenancy fraud, likewise it introduced unlawful profit orders, meaning tenants that sub-let their properties can be ordered to pay any profits they make to the local authority.
5. The City of London Corporation is committed to taking robust action against those that seek to abuse the social housing it provides.

Current Position

6. The investigation of social housing tenancy fraud is undertaken by the Anti-fraud & Investigation team, part of the Chamberlain's Internal Audit section. This team have been successful in identifying and returning possession of social housing that has either been obtained by deception, or illegally sub-let. The following table details the number of social housing tenancy fraud investigations undertaken over the past three reporting years.

	April 2011 to March 2012	April 2012 to March 2013	April 2013 to March 2014
No. of referrals received in year	21	20	38
No. of properties recovered in year	4	6	10
Value*	£72,000	£108,000	£180,000
*Value based on Audit Commission estimates of £18,000 per sub-let property			

7. The City of London Corporation secured its first social housing tenancy fraud, criminal prosecution at the Old Bailey in April 2014, resulting in a former City

of London social housing tenant being sentenced to two years imprisonment for dishonestly obtaining a social housing property using counterfeit Portuguese passports.

8. The Comptroller & City Solicitor will take appropriate civil and criminal action in social housing fraud cases, as appropriate and in line with the evidential test and the public interest test.
9. There is currently no specific delegation to Officers to authorise prosecution proceedings where social housing fraud has been identified. The Comptroller & City Solicitor has a blanket delegation to issue proceedings that are in the interests of the City of London Corporation, this has been the process used to proceed with criminal action in recent cases. Likewise, there is no specific social housing tenancy fraud prosecution Policy.
10. The City of London Corporation will utilise appropriate legislation including the Fraud Act 2006, and the Protection of Social Housing Fraud Act 2013, to prosecute, and pursue the criminal gains made by those tenants that seek to benefit from illegally sub-letting the social housing awarded to them by the City of London Corporation.

Proposal

11. The Head of Audit & Risk Management and the Business Support Director currently have delegated authority to authorise criminal proceedings in housing benefit fraud investigations; it is proposed that both postholders are also given delegated authority to authorise criminal proceedings in social housing fraud investigations.
12. The proposed delegation brings the decision making for criminal action in social housing tenancy fraud investigations, in line with criminal action in housing benefit fraud investigations. This proposal is supported by the Housing Service Director.
13. In order to support our robust approach to tackling social housing tenancy fraud, a Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy has been developed. The key objectives of this Policy are to:
 - i. Underpin the City's zero-tolerance approach to housing fraud, seeking possession orders, prosecution and restitutionary payment (unlawful profit orders, under the provisions of Prevention of Social Housing Fraud Act 2013) in all appropriate cases;
 - ii. Proactively prevent fraudulent activity;
 - iii. Raise awareness amongst staff and the public about tenancy fraud and what that means;
 - iv. Encourage staff, residents and members of the public to report suspected cases of tenancy fraud to the City of London Corporation;
 - v. To deal efficiently and effectively with reports and allegations of social housing tenancy fraud; and
 - vi. Work in partnership with Registered Providers (Housing Associations) to share information, data and resources, where appropriate

14. This Policy has been reviewed by the Business Support Director and the Comptroller & City Solicitor, and reflects the current legislative powers available for dealing with social housing tenancy fraud.

Conclusions

15. The proposed Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy sets-out and strengthens the City’s response to tackling social housing tenancy fraud across its housing estates.
16. It is essential that the City of London has the ability to take criminal prosecution action where social housing tenancy fraud has been identified; the proposed delegation of powers brings the authorisation process for social housing tenancy fraud in-line with an existing delegation for housing benefit fraud offences.

Appendices

Appendix 1: Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy

Contact:

Chris Keesing

Chris.keesing@cityoflondon.gov.uk

020 7332 1278



City of London Corporation

Social Housing Tenancy Fraud – Anti-Fraud & Prosecution Policy

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1. Introduction

1.1 This policy outlines the City of London Corporation's approach to dealing with social housing tenancy fraud.

2. Background

2.1 The City of London Corporation owns and manages in excess of 1900 social housing properties across the City of London and in six other London Boroughs - Hackney, Islington, Southwark, Tower Hamlets, Lambeth and Lewisham. Social housing is provided to eligible persons, in need that could otherwise have difficulty in affording private rents or home purchase. Social housing rents charged by the City of London Corporation are substantially lower than those charged for similar properties in the private sector.

2.2 Since April 2013, those applying for Social Housing with The City of London Corporation require a one year connection in terms of residency or employment (minimum 16 hours per week) in The City of London, to be eligible. Prior to this there was no residency or employment criteria to be eligible to apply for Social Housing with the City of London Corporation, but those who applied without such a connection to The City of London, would be awarded a lower housing priority as part of the choice based lettings process operated by the City of London Corporation.

2.3 Social Housing provided by The City of London Corporation is highly sought after, owing to the location and quality of the housing provided; this makes the City's social housing desirable to fraudsters, who can make substantial profits from sub-letting.

2.4 The National Fraud Authority, Annual Fraud Indicator (June 2013) estimates that the cost of social housing tenancy fraud to Local Authorities across the UK amounts to £845m annually, with at least 5% of social housing properties in major City's either obtained fraudulently or subject to illegal sub-letting.

2.5 In October 2013, the Prevention of Social Housing Fraud Act came in to force; this Act criminalised unlawful sub-letting, and gave additional powers to Local Authorities to investigate social housing tenancy fraud. The City of London Corporation is committed to taking robust action against those that seek to abuse the social housing it provides.

3. Policy Aims & Objectives

3.1 The City of London Corporation is committed to tackling social housing fraud across its housing estates. The City of London Corporation will tackle unlawful subletting and tenancy misuse promptly and effectively, to ensure its housing stock is used by those with legitimate housing need.

3.2 The key objectives of the tenancy fraud policy are to;

- i. Underpin the City's zero-tolerance approach to housing fraud, seeking possession orders, prosecution and restitutionary payment (unlawful profit orders, under the provisions of Prevention of Social Housing Fraud Act 2013) in all appropriate cases;
- ii. Proactively prevent fraudulent activity;



- iii. Raise awareness amongst staff and the public about tenancy fraud and what that means;
- iv. Encourage staff, residents and members of the public to report suspected cases of tenancy fraud to the City of London Corporation;
- v. To deal efficiently and effectively with reports and allegations of social housing tenancy fraud; and
- vi. Work in partnership with Registered Providers (Housing Associations) to share information, data and resources, where appropriate

4. What is tenancy fraud?

4.1 Tenancy fraud or misuse can present itself in various forms and can occur at any stage during the course of a tenancy.

4.2 The following list is not exhaustive, but does include the main types of tenancy misuse:

- i. Illegal sub-letting of the whole property, whether for financial gain or otherwise;
- ii. Obtaining social housing by deception, by providing false or misleading information;
- iii. Making a fraudulent application for social housing, by providing false or misleading information;
- iv. Fraudulent Right to Buy (RTB) applications;
- v. Fraudulent succession of tenancy;
- vi. Unlawful assignment of a social housing tenancy to another; and
- vii. Key selling – where the tenant leaves the property and passes on the keys in return for a one off lump sum payment or favour.

4.3 In many instances unlawful subletting generates lucrative profits for individuals or organised groups. It is therefore essential that the City of London Corporation can demonstrate that those occupying its housing are those who have properly demonstrated their need for such accommodation.

Please note – tenancy misuse does not refer to cases where tenant(s) have taken in a lodger or sublet part of their property with the City Corporation's prior written consent.

5. Impact of tenancy fraud

5.1 Failure to tackle social housing tenancy fraud has a number of effects on the City Corporation, its tenants, and its residents. These are;

- i. that the City's housing stock is not put to best use;
- ii. increased waiting times for prospective tenants and existing tenants wishing to move;
- iii. an increased risk of disrepair and damage to the property due to a reluctance to report repairs or accept improvements, and from modifications to make the property more suitable to sub-let;
- iv. increased risk of criminal damage or anti-social behaviour;
- v. added difficulties gaining access to carry out maintenance repairs or gas servicing;
- vi. the unlawful sub-tenant(s) who may not be aware of their status can be vulnerable to being charged increased rents and deposits and are at risk of unlawful evictions and homelessness;
- vii. impact on resources due to the costs of investigation and court proceedings; and
- viii. risk to the City's reputation from failure to tackle social housing tenancy fraud.



6. What is the City of London Corporation doing to combat tenancy fraud?

6.1 The City of London Corporation undertakes a range of measures to combat tenancy fraud. These are listed below:

Awareness – the City of London Corporation highlights the consequences of tenancy fraud and the methods with which it can be reported via its website and tenant engagement, such as estates newsletters and Your Homes magazine.

When making an application – Prior to a potential tenant being accepted onto the City's waiting list identity, address and financial checks will be carried out to verify the information provided by the applicant(s) is correct.

Prior to the offer of a tenancy – Before a tenancy is allocated, the City carries out a series of identification and verification checks to ensure that the prospective tenant and their family household/circumstances are what they say they are. Proof of essential data is required, such as birth certificates, passports, immigration papers or driving licences. The City reserves the right to verify these documents with external organisations.

At the start of the tenancy - The City endeavours at all times to ensure the right people are allocated suitable housing that meets their housing need. Housing Allocations staff are aware of the potential for social housing tenancy fraud and the importance of the robust application process for preventing tenancies being obtained by deception.

Tenancy inspection visits – A programme of tenancy inspection visits, will see all tenants visited on a periodic basis; such visits are designed to capture data required on household members for wider purposes (such as overcrowding), to ascertain whether any repairs or maintenance is required, and to identify possible sub-letting.

Responding to reports – The City of London Corporation takes all reports of alleged tenancy fraud seriously and will undertake appropriate investigation activity in order to establish the facts.

Publicity campaign - The City of London Corporation will undertake periodic publicity campaigns to raise awareness with residents and the public that they are able to report suspected cases of tenancy fraud (anonymously if they wish). Where appropriate, and as a result of a successful investigation, the City will issue press releases in individual cases where publicity is deemed to be within the public interest.

Court action – Where there is deemed to be sufficient evidence of social housing tenancy fraud, the City of London Corporation will pursue cases through the Civil and/or Criminal Courts as appropriate. The check-list at **Appendix A** to this Policy will be utilised to assist in the decision to instigate criminal proceedings. Civil proceedings will be instigated on instruction from the Director of Housing or his representative.

National Fraud Initiative (NFI) – the City of London Corporation participates fully in the Audit Commission's NFI and submits data bi-annually to be matched against private and other public sector bodies to highlight instances where data provided by one party matches that held by another, indicating possible cases of social housing tenancy fraud.



Pro-active Fraud Drives – The City of London Corporation undertakes pro-active fraud drives in partnership with public and private sector organisations, in order to identify social housing tenancy fraud.

Registered Social Landlord liaison – where appropriate, the City of London Corporation works with Registered Social Landlords to jointly tackle tenancy fraud and share information.

Staff involvement in fraud – the City of London Corporation takes a zero-tolerance approach to employees found to have been involved in social housing tenancy fraud. The City of London Corporation will deal with such matters in-line with its Corporate Anti-fraud and Corruption Strategy.

Reporting a Concern – the City of London Corporation actively encourages people to report social housing tenancy fraud, and maintains a dedicated fraud hotline – 020 7332 3663, and email address – raiseyourconcern@cityoflondon.gov.uk to enable people to effectively raise their concerns.

7. Legislation & Legal Proceedings

7.1 The Comptroller & City Solicitors Department is responsible for identifying and recommending the most suitable legislation under which to instigate proceedings. The following legislation will be considered in cases of Social Housing Tenancy Fraud:

- a. Fraud Act 2006
- b. Prevention of Social Housing Fraud Act 2013
- c. Housing Act 1985
- d. Housing Act 1988
- e. Theft Act 1968
- f. Proceeds of Crime Act 2002

7.2 The decision on whether to instigate prosecution proceedings will be taken by an Officer of the City of London Corporation, with an appropriate delegation of powers; this includes the Head of Audit & Risk Management and the Business Support Director.

8. What factors will the City of London Corporation consider when deciding whether or not to institute criminal proceedings?

8.1 The City of London Corporation will normally consider instituting criminal proceedings where there is sufficient evidence to prove that there has been a social housing tenancy fraud.

8.2 Each case will be reviewed and considered for criminal proceedings on its own merits.

8.3 When considering whether a case is suitable for criminal proceedings the City of London Corporation will take into account the following:

- i. The seriousness of the offence(s) committed;
- ii. The duration of the fraud;
- iii. The number of false statements;
- iv. Whether counterfeit documents were produced/furnished;
- v. Whether the tenant has a beneficial interest in any other property;
- vi. Whether the fraud was premeditated;



- vii. The level of deception;
- viii. The tenants financial circumstances;
- ix. The tenants housing need;
- x. The criminal benefit (how much money has been made from the fraud);
- xi. Whether any similar offences have been committed in the past;
- xii. The outcome from any interview under caution;
- xiii. Any civil proceedings taken against the tenant to recover the tenancy, and the nature of such proceedings; and
- xiv. Whether criminal proceedings are in the public interest.

8.4 The City of London Corporation will likewise take into account matters which may mitigate the seriousness of the offence(s) committed.

8.5 Any decision as to whether or not to prosecute will also take into account the Code of Conduct for Crown Prosecutors as well as the policy matters set out above.

9. Governance

9.1 The Audit & Risk Management Committee review the City's activities for tackling and investigating all types of fraud, including social housing fraud, this Committee receives quarterly Anti-fraud & Investigation up-date reports detailing the City's work in this area.

10. Review

10.1 This Policy will be reviewed by 31st March 2016, or sooner should there be any significant changes to legislation or Policy.

Version No.	Date	Comment	Author
1	27/03/2014	1 st Draft Complete	Chris Keesing
1.1	01/04/2014	Updated following HARM review -minor changes	Chris Keesing
1.2	03/04/2014	Updated following C&CS review – minor amendments	Chris Keesing
1.3	08/04/2014	Updated following review by Business Support Director	Chris Keesing



11. Appendix A – Criminal Prosecution Checklist

	Yes	No
Is there evidence to support housing tenancy fraud?		
Does the evidence available support criminal action?		
Has civil action been instigated to recover the tenancy?		
Has the tenant voluntarily returned possession of the property to the City of London Corporation?		
Has the tenant voluntarily offered or agreed to return possession of the property to the City of London Corporation?		
Has the tenant been dishonest in his/ her dealings with the City of London Corporation?		
Have false statements been made on the housing application form, housing census form, tenancy inspection form, or any other documents provided in support of a tenants housing application or the maintenance of their tenancy?		
Have multiple false statements been made?		
Have fraudulent or counterfeit documents been provided in support of an application for social housing or during the course of a tenancy with the City of London Corporation?		
Has a false statement(s) made by the tenant applicant given him/ her a pecuniary advantage for social housing with the City of London Corporation over others?		
Have breaches of the City of London's Housing Allocation Policy been considered as part of this case?		
Has the tenant/ applicant got recourse to public funds?		
Has a PACE compliant Interview Under Caution been undertaken?		
Was the suspect represented legally?		
Has the tenant admitted dishonesty at Interview Under Caution?		
Has the tenant admitted any offence or breach of their tenancy conditions?		
Is the suspect aware of the consequences of providing false information?		
Is prosecution action consistent with action taken in other similar cases?		
Was the tenant suffering any form of oppression, victimisation or abuse that led him or her to make a false statement?		
Has the tenant made a profit from unlawful sub-letting?		
Do we have evidence of any profit made from unlawful sub-letting?		
Will we be seeking an unlawful profit order?		
Is criminal prosecution action in the public interest?		
Has the evidence been exhibited and produced fully and correctly by the case investigator?		
Have disclosure schedules been produced and checked?		
Has a case summary been produced?		
Has the case been reviewed by the Senior Investigator – is their consideration and recommendation noted?		
Have any other offences been identified as part of this investigation, such as Housing Benefit or Council Tax Reduction fraud?		

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Committee:	Date:
Housing Management & Almshouses Sub Committee	25 September 2014
Subject: Housing & Health – a report on health-related activities and plans in the City’s social housing estates	Public
Report of: Director of Community & Children’s Services	For Information
Summary	
<p>This report gives Members an overview of how good quality and well run social housing can impact upon health outcomes for local communities. It goes on to highlight some examples of how our housing estates and staff are supporting the health and wellbeing of city tenants. It then identifies potential projects and opportunities to further develop this area of work.</p> <p>The report highlights the key impact that housing, neighbourhoods and socio-economic inequalities in housing estates have on health and wellbeing.</p> <p>The report also draws attention to the economic cost arising from poor housing and health.</p> <p>The report informs Members of some of the initiatives currently being developed in the City’s housing estates from developing green spaces to promoting community initiatives to build community resilience and capacity.</p> <p>The City’s new Housing Strategy also provides an important opportunity to further develop longer term strategic priorities.</p> <p>Recommendation(s)</p> <p>Members are asked to:</p> <ul style="list-style-type: none"> • Note the report. • Endorse existing work being undertaken in the city’s estates and future opportunities. 	

Main Report

Background – The case for health and housing

1. The links between tackling the national housing crisis and the nation’s health are growing. A safe, settled home is the cornerstone on which individuals and families build a better quality of life, access the services they need and gain greater independence.
2. Poor housing multiplies inequalities, disproportionately affects vulnerable people, older people living isolated lives, the young, those without a support network and adults with disabilities.
3. The National Housing Federation has highlighted that poor housing conditions increase the risk of poor health by up to 25% during childhood and early adulthood.

4. Structural defects (poor lighting, lack of handrails) increase the risk of accidents. 45% of accidents occur in the home and accidents are in the top ten causes of death for all ages. The majority of injuries to people over the age 75 years occur at home.
5. Furthermore, there is also an evidenced case for the economic impact arising from poor housing and health. The Building Research Establishment (BRE), for instance, calculated that poor housing cost the NHS at least £600m per year in England, with the total cost to society estimated to be greater than £1.5 billion. The annual cost from falls due to structural defects in those aged 60+ is £1 billion with the average cost of a hip fracture estimated at £30,000. This is five times the average cost of a housing adaptation and 100 times the cost of fitting hand and grab rail to prevent falls¹.
6. The impact of health and housing is of particular relevance for the City. The City's housing strategy, for example, has outlined key challenges impacting on the health and wellbeing of City tenants. These include for example, overcrowding, health inequalities in specific wards, demographic changes and meeting the challenges of an ageing population.

The health and housing connection – the evidence base

7. This section highlights the key factors that impact on good health and wellbeing through poor housing, the neighbourhood and socio economic inequalities in housing estates^{2, 3}. In many cases, these factors do not exist in isolation and thus exacerbate their impact:
8. *Poor quality construction, internal environments and design:*
Poor quality construction, internal environments and design increase the risk of damp, mould and cold, these factors are found to contribute to poor health.
9. Cold housing is thought to be the main reason for up to 40,000 additional (excess winter) deaths reported each year between December and March. Damp and cold homes are linked to increased risk of cardio – vascular, respiratory and rheumatoid diseases. Excess winter deaths become significant for those in the 45+ age group, with a marked increase in risk for those aged over 85 years. Very young children, disabled people who spend longer in their home are disproportionately affected.
10. Poor energy efficiency in existing homes and rapidly rising fuel costs make it unaffordable for low income households to adequately heat their homes. Even after significant improvements to the energy performance of the UK'S housing stock, there were 4.5m households in the UK in fuel poverty in 2011. Being unable to afford to keep a warm home, particularly a home that is difficult to heat is a key factor impacting on the health of older people and workless households.
11. Structural defects increase the risk of an accident (poor lighting, or lack of stair handrails) 45% of accidents occur in the home and accidents are in the top 10 causes of death for all ages. The majority of injuries to people aged 75 or over occur at home. Unintentional injury is a leading cause of death among children and young people aged 1-14 years, with one million visits to accident and emergency by children every year arising from injuries in the home.

¹ The Real Cost of Poor Housing, Davidson M, Royes M, Nicole S, Ormandy D, Ambrose P (2010)

² Marmot, Review of Health inequalities in England (2010)

³ World Health Organisation, David Omandy (2011)

12. *Poor access to open spaces and the public realm:*
The social and physical characteristics of a neighbourhood also impact on health. Research has found for example, that those who live in environments with high levels of green space are more likely to be physically active and less likely to be overweight or obese.
13. *The neighbourhood and community safety:*
Feelings of insecurity when out in the neighbourhood and concerns for the safety of the home can help generate stress and depression. Anti-social behaviour such as noise nuisance exacerbates this and can compound mental health issues.
14. *Socio economic inequalities and poor health*
Inequalities in income underpin inequalities in health and those on low incomes are also more likely to live in poor quality housing. Research has shown that the lower a person's socio-economic position, the higher their risk of ill health. There are significant socio economic inequalities in the incidence of diseases such as head and neck, lung and stomach cancers. In terms of socio economic groups, obesity is highest among those in routine and manual occupations. The burden of poor mental health is also not distributed equally, the patient mix in London's health services include much higher numbers from deprived communities. Financial pressures can greatly add to stress and anxiety.
15. *Health, social care and housing:*
Housing with care and support plays a critical role in promoting health and social care, enabling people to remain independent and able to access services from their own homes as well as speeding recovery and improving health more broadly. Preventative services such as housing related support services reduce the need for more care intensive interventions, easing the pressure on local budgets. Timely adaptations to properties are vital in getting people home from hospital quickly, prevent readmissions and facilitate the delivery of peoples care in their own homes.
16. *Community assets - social capital, resilience, social connectedness and good health:*
Health and wellbeing is strongly influenced by community and individual assets (social relationships, resilience, social support and networks, opportunities for voluntary work, life-long learning). There is growing evidence that people with stronger social networks are healthier and happier. Research has also shown that traditional risk based and targeted programmes (smoking cessation, health eating encouraging physical activity) are not enough to bring about health and wellbeing in a community. They do not give sufficient recognition to the fact that individuals, families and neighbourhoods are a potential health resource and not just consumers of health services.
17. Housing and health have a crucial role to play in releasing community capacity and strengthening local networks.

Health and the City's social housing estates

18. *The City context*
The type and clustered nature of the City's housing is unusual. The majority of dwellings (95%) are flats. Most housing is high-density and situated mainly on the City fringe. Social housing in the City, including housing association homes, is concentrated in the estates in Golden Lane, Middlesex Street and Mansell Street.
19. Around 19% of households live in social rented housing and 42% of homes are owner-occupied. The City's overall social rented stock totals 1,924. Unusually for a local authority most of the City's own social rented stock is located outside its boundaries:

467 dwellings are located in the Square Mile; the remaining 1,457 are located in estates in six other London boroughs.

Health and housing - The key challenges in the City

20. Overcrowding

Overcrowding is a challenge for us. Around 1 in 3 of all households in the City lives in accommodation lacking one or more rooms. In terms of demand for social housing, 326 of the households (218 applicants and 108 existing tenants) on our housing register are overcrowded. Although many of these currently live outside the City, all will have a connection or need for social housing within the City or neighbouring areas.

21. Children living in overcrowded homes are up to 10 times more likely to contract meningitis and three times more likely to have respiratory problems. Over a lifetime, overcrowded homes have been linked with slow growth in children which correlates with an increased risk of heart disease as an adult.

22. Health inequalities

Around 1 in 8 households have a disability or suffer long-term health problems. This is less than in London or elsewhere nationally but there are variations in health between neighbourhoods. Poor health is more prevalent in the Portsoken and Golden Lane areas where ill-health and disability affects around 20% of households. Many of these have a physical disability, are frail elderly or suffer with mental health problems and are most likely to require specialist forms of housing, adaptations or support services to help them to remain living independently in their home.

23. A significant number of residents in the Portsoken ward are in receipt of benefits or have low incomes. Pensioner poverty and child poverty in the ward are among the highest in the City. For some of these households fuel poverty may present a growing problem.

24. Stock condition

The construction of many of our homes make them prone to condensation problems. Ageing, single glazed windows and poor insulation mean that some residents struggle to keep their homes adequately heated. The Asset Management Strategy sets out a five-year programme to tackle these issues but at present they are having a negative impact on the lives of some residents.

25. Meeting the demands of an ageing population

The numbers of older people in the City are small but rising and projected to accelerate rapidly. Incidences of age-related health problems such as reduced mobility and dementia and the need for additional support and care are likely to increase.

Examples of good practice in the City's estates

26. Quality, including construction, internal environments and design quality:

Following investment over past decade, nearly all our homes have now been brought up to a basic standard and many have been fully modernised. The Asset Management Strategy sets out the next phase of investment and improvements to homes over the next five years.

Improvements already implemented on some estates include, a replacement windows programme, installing efficient boilers, insulation of homes, renewing door entry systems.

27. *Health, social care and housing*
Our Tenancy Sustainment Team provides support for 35-40 vulnerable residents to enable them to live independently. This includes working closely with Children's Services to prepare care-leavers to take up and then maintain a tenancy.
28. We run three sheltered housing schemes and the City of London & Gresham Almshouses, all of which have dedicated staff to support older residents. The Sheltered Housing Review has identified how we need to change our provision for older people in the future and it, together with the Housing Strategy (2014 – 2019) places greater emphasis on supporting people to live independently in the community and providing the services to enable them to do so.
29. *Socio economic inequalities and poor health*
The City is developing an area-based, multi-agency approach to address these issues and coordinate services and target resources where they are most needed. This is being piloted in the Portsoken ward, where the development of a Library & Community Centre as part of the Middlesex Street Estate has brought the work of Housing and other departments and agencies closer together. Housing officers have become more closely involved with health and social care partners, local communities and other agencies to deliver real improvements in the way services are delivered at a local level.
30. We have undertaken a major programme of work to help residents on low incomes as part of our response to the government's welfare benefit reform programme. Staff have been trained in debt counselling and money-management so that households can be proactively supported to manage their finances, claim any benefits due to them and stay debt free. We have worked closely with the national Illegal Moneylending Team to combat potential issues relating to 'loan sharks' and the negative impact they can have on residents.
31. *The neighbourhood, open spaces and public realm, adequate spaces for living and playing in and around the home, including the importance of gardens or common public spaces*
We are fortunate in having green space, gardens and play areas on most of our estates and these have always provided opportunities for residents to be outside and for children to play. We have worked with residents on several of our estates to enhance their communal space and use it for recreation and leisure. Examples have included creating communal gardens and refurbishing play areas.
32. The fact that we have local staff based on each estate allows us to maintain the external and communal areas to a high level. Graffiti, fly-tipping and littering are rare and are swiftly dealt with when they occur. The locally based staffing also allows us to address anti-social behaviour speedily. We work closely with the local police on each of our estates and they consistently report that not only are crime rates on our estates exceedingly low, but that they are extremely safe places to live.
33. *Healthy lifestyles*
We have also worked closely with residents to encourage healthier lifestyles. Some estates now have communal allotments, where residents can be active and grow vegetables and fruit. We have also worked with different agencies to encourage smoking cessation and greater physical activity, encouraging residents to use stairs rather than taking lifts
34. *Community assets - social capital, resilience, social connectedness and good health*
We have run a number of community development projects and now have a Community Development Officer who works with staff and residents to develop projects designed to

build connectedness, community participation and a sense of community within estates. We also encourage mutual support and volunteering through initiatives like our Good Neighbour Scheme. The 'Remembering Yesterday, Celebrating Today' project is a four-year programme of work which draws all this together.

35. We are lucky to have community halls and rooms on most of our estates and staff work with residents to run social events making the most of these.
36. *The role of the City Estate / Housing Manager*
Our Estate Managers, Sheltered Scheme Managers and their teams play a particularly important and valued role in the early identification and prevention of tenant health and other issues. Through routine contact with tenants, sheltered scheme managers in particular, have for example supported elderly tenants to access support during a health crisis and provided an important source of social contact for isolated tenants. Our staff offer a familiar, trusted presence who know their residents well and can spot problems and get support as early as possible.

Opportunities to further promote good health and wellbeing in the City's housing estates

37. Officers have identified a range of opportunities for the City to further promote good health and wellbeing in its estates. The lists below, though not exhaustive, indicate initiatives which could be implemented in the short term and those longer term opportunities that could be developed over a longer term:

Opportunities in the short term:

- Establish smoke free areas on all estates for play, leisure and recreation
- Where possible, introduce 'green gym' equipment on estates
- Increase estate based initiatives to promote social integration and combat loneliness
- Explore more opportunities for volunteering and informal community education programmes, particularly for the elderly
- Encourage and promote access to programmes and lifelong learning
- Keep people at home, for example through falls prevention, nutrition advice and using community resources to prevent isolation.
- Provide evidence based preventative services such as information and advice or services aimed at minimising disability or dependency.

Longer term strategic priorities:

- Review recent developments in assistive technology such as telecare, passive monitoring etc. and explore what could be introduced in homes of older people to support them.
- Develop a data sharing agreement and process across housing and adult social care to target and support high risk individuals (lone elderly tenants);
- Develop clear and simple pathways for older people to access other public services, voluntary support or life long learning, with training for staff on what is available and how to access it;
- Develop a joint action plan with public health and adult social care to encourage and promote healthy lifestyles for residents;
- Build into the Housing development programme a requirement to provide 'lifetime homes' as part of any new affordable housing;
- Ensure that front-line staff are trained in basic health promotion skills such as the 'making every contact count' programmes run by many local health partnerships;

- Establish a grant programme to support community-led health projects such as communal gardens, green gyms, safe play areas, exercise classes and healthy cookery programmes;
- Introduce health roadshows on estates, promoting cholesterol testing, smoking cessation, physical activity etc.;
- Expand the Tenancy Sustainment Team to work with the Adult Care Service and other agencies to widen the range of housing support offered to residents.

Consultation

38. The Public Health Team have worked with Housing on the development of this report.

Jacquie Campbell

Head of Housing Management

T: 020 7332 3785

E: Jacquie.campbell@cityoflondon.gov.uk

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Committee:	Date:
Housing Management & Almshouses Sub Committee	25 Sept 2014
Subject:	Public
Reduction in external funding to Almshouses residents	
Report of:	For Decision
Director of Community & Children's Services	
Summary	
<p>This report sets out an issue which has arisen at the City of London Almshouses following a change in the way that the London Borough of Lambeth provides support to vulnerable residents. The result of this change has been a reduction in grant funding to residents at the Almshouses.</p> <p>City of London staff have worked very closely with colleagues from Lambeth to mitigate the impact of this change on individual residents and, for the most part, we have been able to ensure that the shortfall has, in the majority of cases, been covered by Housing Benefit.</p> <p>However, a small number of residents ineligible for benefits but on a low income are affected. The report sets out the situation for Members to consider and suggests some options if they wish to provide some short-term financial support.</p>	
Recommendation(s)	
<p>Members are asked to:</p> <ul style="list-style-type: none"> • Agree a discretionary payment to the five residents affected by the financial changes for a period of 3 years, as set out in paragraph 9; • Ask the Director to carry out a review of the eligibility criteria for the Almshouses and report back to the Housing Management & Almshouses Sub-Committee in November 2014. 	

Main Report

Background

1. In April 2014, the London Borough of Lambeth introduced changes to the way in which they provide support to vulnerable people. This was subsequent to the removal of the ring-fence on Supporting People funding, which had led to a need for savings.
2. Prior to this, Lambeth paid a Supporting People grant to the providers of sheltered accommodation within the borough, to cover the cost of support for vulnerable residents. The City of London Almshouses Trust (COLAT) received a

grant for its residents and this was used to pay for a range of services which would, otherwise, have been charged directly to tenants.

3. Under the new arrangement, Lambeth support vulnerable people in the borough through a team of peripatetic workers. To pay for this, they have withdrawn the grant payments to sheltered housing providers. This impact of this for us is that COLAT residents are now liable for the portion of their service charge previously covered by the grant.

Current position

4. Colleagues in Lambeth gave City managers early notice of the changes and we have worked closely with them for some months to mitigate the impact on our residents.
5. We have been able to attribute the increased service costs to charges covered by Housing Benefit. As most of our residents are claiming full Housing Benefit, this means that there has been no financial impact on them.
6. We do, however, have a small number of residents who are employed and are not claiming benefits. We refer to these residents as 'self-funders'. There are five self-funders, all on low incomes, but ineligible for benefits. These five residents are now facing the need to find an additional £16.54 per week to cover the shortfall in their service charges.
7. Whilst not a large sum, this is a significant amount for a low earning person to find, and is causing the affected individuals to be facing considerable financial hardship. Therefore, given the charitable nature of the COLAT, officers felt it was important to bring this to the attention of Members and seek guidance on whether they wish to offer some support.

Options for consideration

8. Members could decide that the increased service charges are the responsibility of the individual residents and that they cannot offer support.
9. The second option would be to offer a subsidy to cover the shortfall on the charges to the five residents. This could be on a time-limited and reducing basis. A typical arrangement for a discretionary payment might be to provide a reducing amount over a three year period. If the full shortfall were to be provided in the first year, and the amount reduced by 20% in each of the two subsequent years, the cost to the COLAT would be as follows:

Year	Total cost to COLAT (£)
1	4300.40
2	3440.32
3	2752.26
Total cost of subsidy over 3 years	10492.98

This is the option recommended by officers as it supports residents, but reduces the liability for the COLAT.

10. Members may, however, wish to consider a third option - for COLAT to fund the shortfall in full for a three year period. This would incur a total cost of £12,901.20.
11. Either of the second two options would be likely to support the five residents to a point where they retire from employment and can then claim benefits to cover the shortfall. If any were still in hardship at that time, officers would reapply to Members for further support.
12. Should any of the five residents have a change in their circumstances within the three year period that would entitle them to claim Housing Benefit, the discretionary payment would cease. This would reduce the total cost of the subsidy.
13. The subsidy would only be applicable to those five existing residents and would not be offered to any new tenants. It is the view of Housing officers and the Chamberlain's department that a review of eligibility criteria for the Almshouses would be in order to ensure that changes of this nature can be taken into account in future. Officers propose to carry out a review and report back to Members in February 2015 with some recommendations.

Recommendations

14. Members are asked to
 - Agree a discretionary payment to the five residents affected by the financial changes for a period of 3 years, as set out in paragraph 10;
 - Ask the Director to carry out a review of the eligibility criteria for the Almshouses and report back to the Housing Management & Almshouses Sub-Committee in November 2014.

Consultation

15. The Chamberlain has been involved in the development of this report and has confirmed that the additional costs can be covered from existing budgets.

Jacquie Campbell
Head of Housing Management

T: 020 7332 3785

E: Jacquie.campbell@cityoflondon.gov.uk

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Committee:	Date:
Housing Management & Almshouses Sub Committee	25 September 2014
Subject: City of London Almshouses Update	Public
Report of: Director of Community & Children's Services	For Decision
Summary	
<p>This report gives Members an information update on the City of London Almshouses, in Lambeth. Some of the information in the report also relates to the eight Gresham Almshouses on the estate.</p> <p>Members of the Sub-Committee have asked officers to investigate alternative options for the traditional giving of Christmas hampers to residents. Options are set out in paragraph 3, below.</p> <p>Recommendation</p> <p>Members are asked to:</p> <ul style="list-style-type: none"> • Note the report. • Decide on their preferred option for Christmas hampers (paragraph 3) and instruct officers to proceed accordingly. 	

Main Report

Background

1. In February 2013 the City of London Almshouses Trustees Committee was merged with the Housing Management Sub-Committee to form the Housing Management & Almshouses Sub-Committee. This report is presented to alternate meetings of the Sub-Committee. It updates Members on operational matters relating to the Almshouses and their residents, and highlights any issues of concern, particularly where funding is required for which is not included in the current year's budget.

Social events

2. Residents enjoyed a coach trip to Margate on 19 June. The weather was good and a relaxing seaside visit was enjoyed by all who attended.

Christmas hampers

3. At the request of the Trustees after the last meeting, officers have been investigating different options for the provision of hampers this year. Officers have investigated three choices for Trustees to consider as detailed below:

A) Continue with the traditional hampers purchased via a specialist hamper supplier. This cost is approximately £2250 for 50 hampers, (including the Gresham residents) although we are able to negotiate a reduction in cost with the hamper company if we order this month.

B) Purchase gift vouchers to the value of £40 each, at a cost of £2000. There is a disadvantage to this option; residents who are still in employment or have private pension income will have to declare the gift as taxable income, which means for them the value of the gift will be less than those residents who do not pay income tax. Officers also have a concern that residents who have problems with alcohol abuse will use the voucher to buy alcohol. Christmas can be one of the most difficult times of the year for people with abuse issues and a voucher may enable them to purchase more alcohol, possibly to their detriment.

C) Officers could compile a list of goods, and ask the residents to choose the contents of their "personal hamper". Officers would then order what each resident requested via a supermarket, internet shopping site. This would allow residents to use the gift to purchase the special treats they enjoy over the festive season. Alcohol would not be on the list.

Garden work

4. The only small area of Japanese knotweed appears to be responding to treatment and the garden remains clear.
5. The increased gardener's hours have shown an improvement in the regular maintenance of the lawns and rose beds on which the residents have commented favourably.

Community Facility & Office

6. The work to create a new hall and office commenced on 11 August. In order to maintain the support structure of the building, when internal walls were removed extra support beams have been installed. The residents living directly above the hall vacated their homes whilst the work was underway for health and safety reasons. One resident had a holiday booked, whilst the other was moved to an empty property on the estate temporarily. The office will be the last area in the development to be complete; in the meantime Matron is working from her home at East Lodge. It is anticipated the hall and office will be complete by the end of October. Officers are planning a celebratory opening event in November which Trustees will be invited to attend.

Essential works to Rogers properties

7. Following our previous update regarding the damp and water ingress issues at the 'Rogers Cottages', the pilot work on one property, went well. The resident enjoyed a short stay away from her home for a two week period while the work

was undertaken. This allowed the builders to remedy the problems, fully investigate any underlying issues and calculate the duration of work for the remaining properties.

8. The pilot property indicated the work would take two weeks per dwelling during which residents have to vacate their homes for safety reasons. Officers considered the difficulty presented for some residents in leaving their homes. Thus, when flat 25 became unexpectedly vacant, officers decided not to offer this property to the next person on the waiting list but to utilise it as a temporary home for the Rogers' residents during their home repairs. The cost of providing external, temporary, suitable accommodation for the duration of the repair in each property was approximately £1200 for 2 weeks, so utilising a vacant property on the estate has greatly reduced the cost of providing alternative accommodation. Flat 25 has been furnished to provide a comfortable alternative home for the duration of the remedial work.
9. Officers have arranged the same support to residents as the 'pilot' cottage regarding storage of their belongings. These have been professionally packed and kept in secure storage for the duration of the work. The company also return the items exactly as they were placed prior to the work and residents have been very pleased with this level of support. To recognise the disruption to their home, residents have been offered an ex gratia payment of £250.

Road repairs and lighting

10. Officers previously reported deterioration in the roadway on the estate, as well as a proposal to improve the lighting for residents' safety and security at the same time as repairs could be effected. Due to the remedial work at the Rogers Cottages and the communal hall project, the survey has not yet been undertaken, however it will be commissioned shortly and officers will present the findings when the report is available.

Networking Group

11. The Sheltered Housing Manager, Jacqueline Whitmore, has been invited to join the East London Almshouses Group; the next meeting is in October 2014. This is a quarterly meeting of Almshouse managers where topics of interest to Almshouse providers and good practices are shared. Other attendees include representatives of City Livery Companies who provide Almshouse accommodation and other benevolent associations. Jacqueline will provide an update on the activities of the Group for the next Committee meeting.

Vacancies and application

12. There is currently one vacant property which is in use for the Rogers' residents while the remedial work is underway. This will be offered to the next person on the waiting list as soon as the remedial work is finished. There is one vacant Gresham property which will be offered to any Almshouse resident who has expressed an interest in moving to the Gresham bungalows. Remedial and

repair work is underway in this property prior to offer to a new resident. Officers have noted an increase in new enquiries with regard to availability of properties at the Almshouses due to rising rents in the private sector. There are currently four approved applicants on the waiting list.

Jacque Campbell
Head of Housing Management

T: 020 7332 3785

E: Jacque.campbell@cityoflondon.gov.uk

Committee:	Date:
Housing Management & Almshouses Sub Committee	25 September 2014
Subject:	Public
Review of Housing Service's Complaints Policy	
Report of:	For Decision
Director of Community & Children's Services	

Summary

This report introduces a complaints policy which, whilst fitting within the corporate policy, is specific to the Housing Service.

The development of the policy, which is attached as Appendix 1, has been prompted by changes to the national system for dealing with housing complaints. Whilst the Local Government Ombudsman (LGO) deals with most complaints about local authority services, those relating to housing services are now largely referred to the Housing Ombudsman (HO), which previously covered only housing associations.

The need for a specific policy and procedure which gives a details and specific path for residents of our housing estates to make complaints was also identified in the recent Resident Communications & Engagement Review.

A detailed procedure for Housing staff and a leaflet for residents have also been produced. The procedure is attached as Appendix 2 and a draft of the leaflet will be provided to Members at the meeting.

If approved in principle by Members, the draft policy and procedure will be taken to the new Housing User Board, a resident consultation panel, for their feedback. If any major changes are suggested as a result of the consultation, amended versions will be brought back to a future meeting.

Recommendation(s)

Members are asked to:

- Note the report;
- Agree, in principle, the draft Complaints Policy & Procedure which form Appendix 1 & 2 to the report.

Main Report

Background

1. The recent review of Resident Communications and Engagement highlighted a need to review and update our Complaints Policy. In addition, recent changes to

the Housing Service management structure required a review of how complaints are processed and escalated internally.

2. In a wider context, since April 2013 the Housing Ombudsman (HO) has dealt with all complaints about social housing. Tenants of local housing authorities and Arms Length Management Organisations previously had the right to refer complaints about housing to the Local Government Ombudsman (LGO).
3. The HO continues to investigate complaints against housing associations and in addition, investigates complaints about a local authority's landlord function. This means that complaints about a local authority's relationship as landlord to its tenants or leaseholders are now considered by the **HO** rather than the LGO.

Key elements of the proposed policy

4. The policy sets out a four stage approach, reflecting the corporate policy. These comprise an informal stage, where local staff try to resolve the complaint; Stage 1, where the complaint is investigated by the relevant Area Housing Manager; Stage 2, where the complaint is referred to the Assistant Director; and Stage 3, where the complaint is reviewed by the Town Clerk.
5. A clear distinction is made between 'service requests' (such as requests to deal with neighbour nuisance or a report of a maintenance problem) and actual 'complaints', which are an expression of dissatisfaction with the way in which a service has been provided or an issue dealt with.
6. Limits have been placed on the amount of time which can lapse between an event and the complaint being made. A complaint must now be made within six months of the incident prompting it. This has been introduced on the advice of the Housing Ombudsman to prevent complaints being made so long after an event that an investigation is difficult. Similarly, if a resident wishes to escalate a complaint to the next stage, they must do so within 30 days of receiving a response.
7. The policy makes reference to the existing departmental Vexatious Complaints Policy and sets out a procedure for invoking this which involves the Director.
8. Increased information will be provided to Members in future regarding housing complaints and a confidential briefing will be provided to the Chairman and Deputy Chairman .

Complaints Procedure & Leaflet

9. It is important that our intention and commitments regarding complaints are open and transparent, and that residents have access to these so that they understand the channels open to them. To this end we have created a Complaints Procedure to complement the updated Policy. This is attached as Appendix 2. We have also created a short information leaflet for residents explaining the updated process for making a complaint. A draft copy of this will be made available to members at the meeting.
10. If Members agree the draft documents in principle, we will apply them immediately, but will publish them as a draft and seek feedback from residents

via the Housing User Board (HUB). The final version will be brought back to the Housing Management & Almshouses Sub-Committee for signing off once feedback has been considered and incorporated.

11. The Policy will be made available on the City's website and in all estate offices. The leaflet explaining how to make a complaint will also be published online and included in all new tenancy welcome packs.

Next steps

12. Work with the HUB to incorporate residents' feedback on the draft Complaints Policy and Procedure.
13. Publish and distribute the new leaflet for residents
14. Review the policy and accompanying documents annually.

Consultation

15. The Housing User Board (HUB) will be officially launched at Resident Celebration Day on 18 October 2014. This group comprises residents from across our estates who have indicated they would like to be involved in consultation activities. The first task assigned to the HUB will be to provide comments and feedback on the proposed Complaints Policy and Procedure. Minor amendments will be incorporated where appropriate but any major changes will be brought back to this Sub-Committee for decision.
16. The Town Clerk, Comptroller and Chamberlain have been consulted in the development of this report, policy and procedure.

Appendices

- Appendix 1 Draft Housing Service Complaints Policy
- Appendix 2 Draft Housing Service Complaints Procedure

Jacquie Campbell

Assistant Director Housing & Neighbourhoods

T: 020 7332 3785

E: Jacquie.campbell@cityoflondon.gov.uk

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Department of Community and Children's Services

Housing Service Complaints Policy

Issue Number	003
Date	August 2014
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Author	Jacquie Campbell

Document Control Sheet

Revisions

Version	Page/Paragraph Number	Description of Change	Date Approved

DRAFT

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Introduction

The City of London Housing Service aims to provide a high quality response and consistent service. We recognise, however, that there will be occasions when residents are not satisfied with the actions we have taken. This policy sets out the principles of our approach to complaints. A detailed procedure accompanies this policy (Appendix 2), clearly setting out the steps to be followed at each stage in the complaints process, and explaining who is responsible at each step. We have also created a leaflet for residents explaining the process (Appendix 3).

Policy aims

The City of London Housing Service aims to:

- make it easy for our customers to make a complaint by whatever means they choose;
- address service requests and enquiries speedily and at a local level so that complaints about our service are minimal;
- deal with complaints quickly, efficiently and with courtesy;
- follow a simple procedure so that the complainant knows what is happening at all times;
- give a clear response within set time limits explaining the action we will take and why;
- treat complaints as feedback that will help us to continuously improve our services.

Legislative and policy framework

There is no legislative basis on which a complaints policy must be based. This policy fits within the City of London's Corporate Complaints Policy and takes into account guidance from the Housing Ombudsman and the Local Government Ombudsman, as well as regulatory standards.

Definition of a complaint

A complaint is an expression of dissatisfaction, however made, about the standard of service given or the action or lack of action taken by the City's staff in responding to a customer request or enquiry. Examples of a complaint can include where the complainant believes the Housing Service have:

- failed to do something that should have been done;
- failed to meet service standards
- treated a customer rudely or unfairly

A request for a service, information or an explanation will not be treated as a

complaint; staff should be given the opportunity to respond to the request or enquiry and to follow required procedures, taking the action they consider appropriate. If the customer is dissatisfied with the response or action taken, then we would consider this expression of dissatisfaction to be a complaint, and this policy would apply.

Data Protection and Confidentiality

The City of London is aware of its obligations under the Data Protection Act 1988 and will handle any information received in accordance with the rules and regulations set out within this act.

As far as possible, all complaints will be treated in confidence. The name of the person complaining will not be divulged more than is absolutely necessary and will not be given to a third party without the agreement of the complainant. However, people making complaints must appreciate that if their complaint involves another person, it cannot be investigated without speaking to that person, and it may not be possible to conceal the identity of the complainant.

No member of staff will investigate a complaint that relates to them.

Equal opportunities

The City of London operates an Equality & Diversity policy and this applies to all aspects of its services. When dealing with complaints, no complainant, or their representative, will be treated less favourably on the grounds of age, race, nationality, ethnic origin, religious belief, disability, gender, sexual orientation or personal belief.

This policy and all related information can be made available in different formats and languages on request.

Who can use the complaints policy?

This policy is primarily for the use of tenants and leaseholders of the City of London and freeholders who receive services from the Housing Service. It can also be used by people authorised to act on behalf our tenants, leaseholders or freeholders (e.g. relatives, solicitors, advice agencies, councillors) or by people affected by the City of London Housing Service (e.g. residents of neighbouring estates).

The policy also covers people applying for services delivered by the City of London Housing Service, such as people making a homelessness or housing application.

What can they complain about?

They can complain about any aspect of the service delivered by the City of London Housing Service. Complaints are most likely to be about:

- Service or accommodation provided by the City;
- Way in which the service is delivered;
- Attitude or approach of staff.

What is not covered by this policy?

As detailed above, this policy does not cover service requests or enquiries. It does not apply to complaints about other residents or neighbour disputes, which are dealt with under our Anti-social Behaviour policy. However, if the complaint is about the way a neighbour issue or dispute has been handled, then it would be appropriate to use the Complaints policy.

We will not normally deal with anonymous complaints, other than in a very general way, given the difficulty of carrying out a full investigation. We will, however, keep such complaints on file as they could provide early warnings of a service delivery failure.

This policy covers service requests and enquiries from leaseholders and freeholders on City of London estates, but does not cover service charge disputes as these are dealt with under a separate process, ultimately ending in a Leasehold Valuation Tribunal.

If the complaint is about the content of a policy rather than how it has been carried out, then this will not be dealt with under the Complaints policy. For example, if someone has had a housing application refused because they do not meet the criteria set out in the Allocations Policy, they cannot use this Complaints policy but must use any appeals process open to them. Similarly, this policy cannot be used to appeal against Benefits decisions, but can be used for a complaint about the way in which Benefits staff have treated an individual or an application.

We do not accept complaints where the customer has started legal proceedings or has previously taken the matter to court or tribunal, nor will we investigate any issue that has already been addressed through the Housing Service's complaints procedure.

We encourage comments and feedback on policies via consultation processes and will take comments received into account when policies are reviewed.

Timescales

We aim to acknowledge all complaints within two working days and to send a full written response within 10 working days. If an investigation requires longer than this we will contact the complainant and give a date by which they can expect a full response.

At each stage of the formal process, complaints must be received within 30 calendar days of the response being sent to the complainant. This is so that investigations can be carried out swiftly and we are not investigating events which happened some time previously.

We will only investigate complaints which are made within 6 months of the event which caused the complaint.

Helping people to complain

A leaflet explaining the Complaints policy and procedure is available on the City of London website, from all Estate Offices, Sheltered Schemes and the Barbican Estate Office. This information is also included in all Tenant Information Packs.

Where requested and appropriate, staff will assist the complainant to define, quantify and submit their complaint. The complaint stages are sequential and complaints must be dealt with fully under each stage before the complaint can progress to the next stage.

Southwark Mediation Centre provides an independent complaints resolution service to residents of City of London homes. At any stage in the process, the complainant can request help from this service. We may also refer complainants to the service if we think that the involvement of a third party may help to resolve the complaint more effectively. The involvement of Southwark Mediation Centre will effectively pause the complaints process at any stage so that resolution can be sought, but if this is not successful, the complaint can resume from whatever stage it had previously reached.

Complaint stages

Informal stage

Customers have every right to make a formal complaint if they wish to do so. However, it is often quicker and easier if the issue can be resolved informally and directly with the day-to-day operational staff. We ask customers to speak initially, by phone or in person, to local operations staff and to ask for the Estate Manager, Sheltered Housing Manager or appropriate Team Manager.

Staff will make every effort to resolve the issue directly, contacting colleagues if this is appropriate. If it is not possible for the Estate Manager, Sheltered Housing Manager or Team Manager to resolve the issue to the satisfaction of the customer, they will give details of how to make a formal complaint.

If the complainant wishes to make a formal complaint verbally, the staff will record the complaint, the solution being sought by the complainant, and the action taken to date. This will be signed by the complainant and submitted on their behalf.

If the complaint relates directly to an Estate Manager, then it should be directed to the Area Housing Manager in the first instance. If the complainant is dissatisfied with the response from the Area Housing Manager, the complaint will skip stage 1 and go straight to stage 2.

Formal Stage 1 (Senior Manager)

This stage formalises the complaint and is dealt with by the senior manager responsible for the provision of the appropriate services. For most complaints, this will be the Area Housing Manager. Alternatively, it may be the Property Services Manager for repairs complaints, the Revenues Manager for complaints related to rents and other charges, or the Allocations Manager for complaints regarding the Allocations Team.

A formal complaint must be made within six months of the event being complained about.

The complaint will be acknowledged within two working days. The responsible manager will carry out an investigation. This may involve an initial meeting with all relevant staff and managers to review the complaint, gather information and see if anything can be done to resolve the complaint at this stage. The investigation will also involve interviewing staff (and examining paperwork) and may also involve a meeting or discussion with the complainant. A full written response to the complaint will usually be sent within 10 working days. If an investigation requires longer than this we will contact the complainant and give a date by which they can expect a full response. This response will advise of the outcome of the investigation, any actions to be taken as a result, and the action to be taken by the complainant if they remain dissatisfied.

If the issue relates directly to an Area Housing Manager, then it should be taken straight to the Assistant Director, Housing & Neighbourhoods (AD, H&N).

Formal Stage 2 (Assistant Director)

Stage 2 complaints should be addressed to the Assistant Director, Housing & Neighbourhoods (AD, H&N). The AD, H&N will either investigate the

complaint or pass it to the Assistant Director, Barbican & Property Services for investigation if this is more appropriate.

The complaint will be acknowledged within two working days. The appropriate AD will investigate, review actions taken and propose a solution if this is possible. A full response will be sent from the AD within 10 working days of the receipt of the Stage 2 complaint. If the investigation requires longer than this we will contact the complainant and give a date by which they can expect a full response. This response will advise of the AD view, any actions to be taken as a result, and the action to be taken by the complainant if they wish to proceed to Stage 3.

Formal Stage 3 (Town Clerk's Department)

Stage 3 complaints should be addressed to the Town Clerk. An officer from the Town Clerk's department will be allocated to carry out a review of the actions taken by Housing managers and staff to address the complaint at all stages. A response will be sent on behalf of the Town Clerk within 10 working days of the receipt of the Stage 3 complaint. This response will advise of the view taken by the Town Clerk's department and any actions to be taken as a result. It will inform the complainant that the City's internal processes are now at an end and will advise on how they can contact an external body or individual to find out about other action they can take.

The Town Clerk's department will not consider a complaint unless it has already been through Formal Stages 1 and 2. If a complainant contacts the Town Clerk at an earlier stage, they will simply be referred to the Housing Service so that the proper process can be used.

External bodies

Until April 2013, all local authority complaints, including those relating to housing services, were referred to the Local Government Ombudsman. However, the Localism Act changed this and complaints about services provided by housing landlords, whether private, housing association or local authority, are dealt with by the Housing Ombudsman. Complaints about other issues, such as Allocations and Housing Advice, are still handled by the Local Government Ombudsman. The following table summarises which types of queries should go to which Ombudsman, although it is worth noting that both Ombudsmen admit that not all areas are clear cut and some clarification would be helpful.

Housing Ombudsman	Local Government Ombudsman
Leasehold services	Right to buy and other sales
Transfers outside Housing Act 1996 Part 6	Housing Allocations under Housing Act 1996 Part 6
Rents and service charges	Homelessness
Occupancy rights	General housing advice
Repairs and improvements	Anti-social behaviour

Tenant behaviour	Planning and building control
Cleaning and grounds maintenance	

Each Ombudsman has a different process for receiving complaints and different ways of dealing with them. The Local Government Ombudsman can require a council to publish and consider the report of an investigation, but has no powers to require any other action or impose compensation.

The Housing Ombudsman does not require reports to be published, but can require action or compensation. The Housing Ombudsman process incorporates an additional step whereby the complaint can be taken to a 'designated person' to attempt a resolution before involving the ombudsman. This designated person may be a local authority councillor representing the ward in which the complainant lives or the local Member of Parliament. The designated person is not obliged to take on the complaint but may do so if they wish. We provide guidance to City of London Members in residential wards on the role of a designated person.

The Stage 3 response will refer the complainant to the website and phone number of the appropriate Ombudsman so that they can get relevant advice about how to proceed with their complaint and whether approaching a designated person may be appropriate.

Unacceptable behaviour

Occasionally complainants behave in a way which is unreasonable. This may include:

- making numerous complaints about minor matters or matters which staff cannot address and which are taking up an unreasonable amount of staff time;
- contacting different officers to complain about the same issue;
- being abusive or offensive to staff.
- making unfounded or unsupported allegations about staff which may be malicious in nature.

This behaviour can be identified at any stage of the complaints process, including the informal stage, and will be dealt with in the same way.

The Department of Community & Children's Services has a Vexatious Complaints Policy (Appendix 1) which we will invoke in such circumstances. Before invoking the Vexatious Complaints Policy we will call a case conference, involving relevant local managers, the Assistant Director, Housing & Neighbourhoods (or representative), the Departmental Complaints Officer and a representative from the Town Clerk's Dept. If it is agreed that the Vexatious Complaints Policy should be invoked, the complainant will be advised in writing that we will no longer correspond directly with that person, except in an emergency. They will still be able to report repairs in the normal

way and can communicate with us if necessary through an independent third party such as a mediator or advice agency. This is very much a last resort and happens very rarely.

Performance monitoring

The Community & Children's Services Committee receives quarterly performance reports which include the number and type of complaints received and response times.

The Projects & Improvements Manager within the Housing & Neighbourhoods Team is responsible for monitoring complaints internally to ensure deadlines are met and that managers make use of the feedback the complaints provide. The number of formal complaints at each stage will be presented to Members of the Housing Management & Almshouses Sub-Committee as part of the six-monthly Housing Update. A short, confidential briefing summarising any complaints that reach stage 3 will be presented to the Chairman and Deputy Chairman of the Housing Management & Almshouses Sub-Committee as they arise. The Chairman and Deputy Chairman, and the appropriate Allocated Member(s) will also receive a short confidential report on any occasion when the Vexatious Complaints Policy has been invoked.

Complaints are reviewed when developing annual Estate Plans and Service Plans and service improvements made to reflect findings.

The Housing Projects & Improvements Officer will administer the complaints log to record all complaints, response times and outcomes.

Links to other policies

This policy fits within the City of London's Corporate Complaints Policy. It links to other Housing Service policies and procedures including:

- Allocations Policy
- Anti-social Behaviour Policy
- Customer Services Policy
- Resident Involvement Plan
- Tenancy Agreement & Handbook

Further Information

For further advice or information please contact the Projects & Improvements Manager, Kate Bowen, on Tel: 020 7332 1653 or email katherine.bowen@cityoflondon.gov.uk.

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Housing Services Complaints Procedure

Housing Services follows the City of London's corporate complaints procedure for all our complaints. This chart shows each stage to be followed and the individuals responsible for these stages in Housing Services.

EM - Estate Manager

AD H&N - Assistant Director Housing & Neighbourhoods

AHM - Area Housing Manager

PIM - Projects & Improvements Manager

In the majority of cases, complaint responses will be co-ordinated by Housing Management staff. However, there may be some complaints which are solely related to other aspects of service, such as Property Services or Benefits. In these cases, the appropriate managers would be substituted for the EM and AHM and the AD Barbican & Property would take the place of the AD Housing & Neighbourhoods.

STAGE	THE ISSUE	WHO DEALS WITH IT AND HOW?	TIME SCALE
Informal stage (May be made in person, by phone or in writing through email, Facebook or letter)	Resident has a problem which they wish to be resolved.	<p>Local estate staff do everything they can to resolve the issue, within the parameters of our policies and resources. EM must have seen and/or spoken to the resident to try and address the problem before it is taken further. If the complaint is made in a public arena such as Facebook, the estate staff should contact the complainant and ensure that further dialogue takes place which is not publicly accessible.</p> <p>A 'Resident Issues' record should be opened and all actions taken in connection with the issue recorded with dates and times of all contacts, names of staff involved etc. This record should be placed on the house file for the tenant and also kept electronically.</p> <p>Full details of all contact with the resident should also be logged on Orchard throughout the issue.</p> <p>If the issue cannot be resolved to the satisfaction of the resident, the EM should provide a copy of the Complaints leaflet and contact details of the AHM. Resident should be informed that formal complaints must be made within six</p>	1 week

		<p>months of the issue occurring.</p> <p>If the issue relates directly to an Estate Manager, then it should be directed to the AHM in the first instance. If the complainant is dissatisfied with the response from the AHM, the complaint will skip stage 1 and go straight to stage 2.</p>	
<p>Stage 1</p> <p>(in person or by phone but usually in writing)</p>	<p>Resident dissatisfied with the action taken by estate staff.</p>	<p>A formal complaint must be made within six months of the event which is the subject of the complaint.</p> <p>AHM acknowledges complaint within two working days. AHM sends copy of complaint to housing.complaints@cityoflondon.gov.uk and includes details of response deadlines so the PIM can monitor the complaint and add it to the Housing Complaints Log.</p> <p>AHM may convene a meeting of all staff involved in the matter. At this meeting the case is discussed and possible ways of resolving the complaint considered. This should include the use of Southwark Mediation Centre to provide an independent perspective and approach to resolving the complaint.</p> <p>The AHM then completes the investigation, examining correspondence and other paperwork, and does everything possible to resolve the issue – meeting or speaking to the resident and responding in writing to ensure there is a record of the response.</p> <p>In the written response, the AHM should cover:</p> <ul style="list-style-type: none"> - What the investigation has involved; - What the AHM has found; - What resolution is proposed and by when; - That if the resident is dissatisfied with how their complaint has been handled and wish to move to Stage 2, they should write to the AD H&N within 30 days, stating their desired outcome to resolve their complaint. <p>AHM sends copy of the full response to housing.complaints@cityoflondon.gov.uk</p>	<p>10 days* from receipt of complaint</p>

		<p>so the PIM can update the Housing Complaints Log.</p> <p>AHM to record details of all actions and contacts on the 'Resident Issues' record and on Orchard. A copy of the complaint and the response should be placed in the house file.</p> <p><i>If the complaint relates directly to an Area Housing Manager, then it should be taken straight to the Assistant Director, Housing & Neighbourhoods (AD H&N).</i></p>	
<p>Stage 2 (written)</p>	<p>Complaint not resolved and resident dissatisfied with the way in which it has been handled.</p>	<p>AD H&N receives complaint and forwards to housing.complaints@cityoflondon.gov.uk so progress can be monitored.</p> <p>AD H&N investigates complaint - through discussions with staff, examination of correspondence and documentation. If complaint relates to property issues, it is passed to the AD Barbican & Property Services to investigate. A response letter is then written to the complainant and copied to housing.compalints@cityoflondon.gov.uk.</p> <p>The letter will state that if the resident remains dissatisfied with how the complaint has been handled, they should write to the Town Clerk within 30 days and state the resolution they seek.</p> <p>PIM updates Housing Complaints Log with outcome of complaint.</p> <p>AD H&N will record details of all actions and contacts on the 'Resident Issues' record and on Orchard. A copy of the Stage 2 complaint and the response should be placed in the house file.</p>	<p>10 days* from receipt of Stage 2 complaint</p>
<p>Stage 3 (written)</p>	<p>Complaint not resolved & resident dissatisfied with how it has been handled at Stage 2.</p>	<p>Town Clerk's department receives the letter and nominates a Chief Officer to investigate.</p> <p>Nominated Chief Officer to email housing.complaints@cityoflondon.gov.uk so it can be logged locally and progress can be monitored.</p>	<p>15 days* from receipt of Stage 3 complaint</p>

		<p>Investigation is carried out in liaison with the Stage 1 and Stage 2 investigators. TC representative reaches a judgement and communicates this to the AD H&N. Any suggestions for resolving the complaint are discussed.</p> <p>A letter is sent from the Stage 3 investigator, communicating the findings. The letter closes by saying that our process is now at an end and that if the resident remains dissatisfied, they should contact the Housing Ombudsman for advice on what they can do next.</p> <p>TC representative sends copy of the full response to housing.complaints@cityoflondon.gov.uk so the PIM can update the Housing Complaints Log.</p> <p>The PIM will produce a short, confidential briefing summarising any stage 3 complaints. This will be presented to the Chairman and Deputy Chairman of the Housing Management & Almshouses Sub-Committee as the complaints arise.</p>	
<p>Using Southwark Mediation Centre (SMC)</p>	<p>In any case where it is felt that the services of professional mediators may be useful to resolve a complaints.</p>	<p>Any possible mediation use should first be discussed with the AHM. The complainant should be contacted and asked for permission to have their details referred to an independent complaints resolution service. If they agree, a referral form should be completed and SMC contacted.</p> <p>If mediation is to take place, the AHM should email housing.complaints@cityoflondon.gov.uk so the Complaints Log can be updated.</p> <p>During mediation, the complaints process is paused, to allow every opportunity for the issue to be addressed. The complaints process can be reactivated at any time if, for example, mediation breaks down.</p> <p>The PIM will meet with SMC every six months to discuss how the process is working and to ensure both parties remain satisfied with the arrangements in place.</p>	

<p>Vexatious Complaints</p>	<p>In any case where it is felt that the complainant is demonstrating unreasonable behaviour which meets the criteria of the DCCS Vexatious Complainants Policy</p>	<p>The situation should be brought to the attention of the AHM, who will discuss the case with the AD H&N, providing evidence of why the complainant's behaviour is felt to be unreasonable.</p> <p>If the AD H&N agrees, a meeting will be convened, involving the AD, the appropriate AHM and EM, the Departmental Complaints Officer and the PIM. A representative from the Town Clerk's Dept may also be invited.</p> <p>The case will be discussed at the meeting. A recommendation will then be made to the Director of Community & Children's Services to invoke the Vexatious Complaints policy. If so, appropriate sanctions will be agreed.</p> <p>The AD H&N will write to the complainant, informing them of this decision, the sanctions and any timescales. A copy of this letter will be placed on the complainants file and sent to both the Departmental Complaints Officer and the Town Clerk's Dept.</p> <p>A briefing will also be sent to the Chairman and Deputy Chairman of the Housing Management & Almshouses Sub-Committee, and the appropriate Allocated Member(s).</p>	
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* Unless a longer investigation is required, whereupon the Manager should write to the complainant to inform them of the revised response target.

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Committee:	Date:
Housing Management and Almshouses Sub Committee	25 September 2014
Subject:	Public
Sheltered Housing Review	
Report of:	For Decision
Director of Community and Children's Services	

Summary

This report sets out the findings of the sheltered housing review together with key options and recommendations for further action.

The purpose of the review was to look at the City's existing social housing provision for older people and to consider what changes might be needed to reflect national policy and the changing needs and aspirations of people regarding accommodation for their later years.

The findings have been clear and unsurprising. The majority of people today do not view traditional sheltered housing as an appealing prospect, and most people wish to stay in their existing homes as long as possible. Changes in health and social care policy promote this path, and new technology offers increasingly sophisticated ways of providing support.

The City's existing sheltered housing schemes all need significant investment to improve and update them. However, this will not be enough to bring all of them up to a level where they offer appropriate and attractive accommodation which will attract new residents and encourage older people to move in order to free up larger homes for families.

The review and this report sets out a number of proposals for the City to address these issues and improve its housing offer for older people. Broadly, these are:

- a new focus on the building of 'lifetime' homes as part of our development programme;
- a move to include housing suitable for older people on all our estates where possible, so that people can stay in their own communities when they need to move, rather than uprooting to where there is a sheltered scheme;
- changes in how we deliver housing support and ensure that older people are not socially isolated.

It is important to note that, because of the vulnerability of many of the people involved, these changes cannot be made quickly, but will require careful and sensitive planning and implementation, with appropriate timescales.

This report represents the end of Phase 1 of the Sheltered Housing Review. The next phase will be to carry out detailed options appraisals for each of our existing schemes and to identify opportunities for building lifetime homes on our estates.

Recommendations

Members are asked to consider the review and report and to:

- Recommend to the Community & Children's Services Committee that future strategy should be to provide lifetime homes, suitable for older people, on every estate as far as possible;
- Authorise officers to commission detailed options appraisals for each of the City's existing sheltered housing schemes which take into account the need to fund the development of lifetime homes;
- Request that a paper identifying opportunities for building lifetime homes on existing estates be brought to this Sub-Committee early in 2015.

Main Report

Background

1. The sheltered housing review was initiated following a report on supported living undertaken as part of the development of the City's Health and Wellbeing Commissioning Strategy. The report, approved by the Community and Children's Committee in December 2012, recommended a review of existing sheltered housing provision to assess potential for delivering improved support for older people more widely in the community.

Current Position

2. The review began in May 2013 and was conducted alongside the development of the Housing Strategy 2014-2019. Phase 1 of the review, covering research, information gathering and is now complete. This report summarises the purpose and key findings of the review together with proposals for further action. A full copy of the review is attached as Appendix 1.

Purpose and method of the review

3. The objectives of the review were to:
 - assess the quality of the City's existing sheltered housing provision, levels of demand and need;
 - identify issues and areas for improvement;
 - to develop proposals for change to modernise the sheltered housing service, position it more clearly within a balanced range of housing provision for older people, and deliver more effective and efficient support services.
4. During the review officers and members visited an extra-care housing scheme and visits were undertaken by other major housing providers to make independent assessments of City sheltered schemes. Extensive consultation with the City's sheltered housing residents and other older City residents was carried out. Officers have also undertaken research into current policy and

practice in the delivery of care and housing-related support. This has been taken into account in drafting proposals.

5. The work of the review has been overseen by a project board which included elected members.

Key points and findings of the review

6. These are summarised below. More detail on the following findings can be found in the review which is attached at Appendix 1.
 - Rising numbers of older people are likely to increase pressure on services. However, the assessment of future needs is complex; changes in aspirations, the delivery of care, and the availability of suitable alternative housing for older people are likely to lead to less demand for traditional sheltered housing.
 - Policy and technology are challenging traditional models of sheltered service provision and delivery such as the City's. Nationally, there is an oversupply of sheltered accommodation. Some authorities are re-modelling provision to provide housing-related support in more flexible ways to target resources more tightly, and across different tenures.
 - The supply of specialist housing for older people within the City and on the City's housing estates in neighbouring boroughs consists of traditional sheltered accommodation. Six schemes provide 235 units, 219 of which are social rented. There is no private retirement or extra-care provision in the City.
 - Four of the schemes are managed by the City's Housing Service. These are all located in neighbouring boroughs. Two housing associations, the Guinness Trust and Hanover, provide sheltered housing within the City to which we have some nomination rights. However, these are reducing as Iveagh Court, run by the Guinness Trust, is no longer providing sheltered accommodation.
 - Demand for sheltered housing is generally low and some schemes are difficult to let. Because of this, age limits have been lowered, and the schemes are increasingly being used to meet general housing need. This causes tension between younger residents and those who are older and have greater support needs.
 - Nationally, sheltered housing is becoming less attractive to its original market of fit and active older people. In the City, perceptions of sheltered accommodation amongst non-residents are poor and very few younger people regard it as a positive choice for their future needs.
 - Most people want to remain living in their existing homes for as long as possible, especially in the City. High levels of owner-occupation, satisfaction with their existing neighbourhood and the lack of suitable alternatives in the local market may be contributing to this, although residents also appear disinterested in private retirement housing provision.

- The requirement for extra-care housing in the City is very limited. This form of provision is unlikely to be an efficient or sustainable option for the City.
- All of the City's schemes are more than forty years old and will require significant investment and improvement in the near future to update them, meet quality and regulatory standards and match the current aspirations and requirements of older people. Even with this, they may still fail to attract tenants in the future.
- Some schemes have proved difficult to let. Two schemes, Harman Close and Mais House, suffer most from outdated space standards, kitchens and bathrooms and will require refurbishment or remodelling order to make them fit for purpose in the future. Mais House is the most problematic, suffering in addition from poor layout, an over-supply of bedsitter accommodation, poor location and low demand.

Implications of findings

7. If the City retains its sheltered housing, then planned investment and improvement will be required over the medium term to bring stock up to current quality and regulatory standards. However, refurbishment alone is unlikely to address the issues faced, or to make the traditional sheltered housing model attractive to older people in the future. The City will need to consider a different model of provision if we wish to properly meet future need in a way which reflects national policy and meets the needs and aspirations of future residents.
8. A better model for the future is the provision of 'lifetime' homes within existing and any new estates. These homes would have a high level of accessibility and be designed so that any adaptations to meet the needs of disabled people could be done quickly, easily and at a low cost. The homes would be available to general needs tenants, but priority would be given to older residents.
9. Provision of lifetime homes within estates would mean that older people would have an option to move into more suitable accommodation within their existing community, thus keeping them close to friends and neighbours and within a familiar environment – particularly important for people in the early stages of dementia.
10. This approach would require a different model of support to be provided. Rather than static 'warden' posts within sheltered schemes, floating support would be used as needed. Community facilities on our estates could be upgraded to provide appropriate places for older people to meet and enjoy activities organised by support staff – thus combatting social isolation.
11. To achieve this would require opportunities to be identified as part of the City's housing development programme. These will then need to be incorporated into the Asset Management Strategy.
12. The City would also need to consider the future of the existing sheltered schemes. Isleden House and the City of London & Gresham Almshouses are likely to remain popular choices as they provide opportunities to live

independently in a property with its own front door, but in an estate which provides additional support. These schemes, then, would benefit from improvements to make them more accessible.

13. However, Mais House and Harman Close are very outdated schemes with small flats (mostly bedsits) sited along corridors. When they were first built, meals were provided in a communal setting, and so the kitchens are extremely small and do not provide adequate facilities for people to cater for themselves. Mais House is a particular concern as, not only is it the most outdated of our schemes, but it is located at the top of a steep hill, without access to local shops and amenities, which is entirely unsuitable for older people.
14. An initial assessment has been made of Mais House with input from a specialist provider of housing for older people. As part of Phase 2 of the review, it is recommended that a detailed options appraisal of both Mais House and Harman Close is commissioned to identify whether these should be refurbished or remodelled and retained as schemes, or whether it would be better, over time, to decommission them and reprovide accommodation in a different form.

Recommendations

15. Members are asked to consider the review and report and to:
 - recommend to the Community & Children's Services Committee that future strategy should be to provide lifetime homes, suitable for older people, on every estate as far as possible;
 - authorise officers to commission detailed options appraisals for each of the City's existing sheltered housing schemes which take into account the need to fund the development of lifetime homes;
 - request that a paper identifying opportunities for building lifetime homes on existing estates be brought to this Sub-Committee early in 2015.

Corporate & Strategic Implications

16. The proposals fit with corporate priorities to provide modern efficient and high quality services for residents with a view to delivering sustainable outcomes.
17. The proposals fit with the City's housing strategy priorities to support older people, review how best use sheltered housing, the benefits of new technology and floating support.

Implications

18. The cost of the options appraisals will be in the region of £15k which can be found from local risk budgets.
19. There are no financial or legal implications at this time. These will be evaluated and included in the costed and detail options appraisals to be undertaken in the next stage of the review.

Consultation

There has been extensive consultation with City residents and residents of the City's sheltered schemes as part of this review.

Appendices

- Appendix 1 – Sheltered Housing Review

Background Papers:

- Supported Living Review – Community and Children's Services Committee 12 December 2012

Paul Jackson

Service Review Consultant

T: 0207 332 1574

E: paul.jackson@cityoflondon.gov

City of London Corporation – Sheltered
Housing Review 2014

Department of Community and Children's Services

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Introduction

1. This report sets out the context and key findings of the Department of Community and Children's Services sheltered housing review.
2. The review was initiated following a report into supported living undertaken to help implement the City's Health and Wellbeing Commissioning Strategy. It was approved in December 2012. That report included a recommendation to:

'review existing sheltered housing provision and assess potential for delivering improved support for older people more widely in the community'.

Aim and method of the review

3. The objectives of the review were to assess the range and quality of the City's existing sheltered housing provision, current and likely future demand and need, and to identify gaps in provision and opportunities for improvements. The review has taken into account the changing housing needs and aspirations of older people, current policy and developing practice in the delivery of social care and housing-related support. The aim of the review is to develop options for change that position the sheltered housing service more clearly within a balanced range of housing provision for older people and integrate it more effectively with adult care and support services;
4. There are six sheltered housing schemes available to City residents. Four – Isleden House, Harman Close, Mais House and City Almshouses - are owned or managed by the City. Two – Tudor Rose Court and Iveagh Court - are owned by housing associations and grant nomination rights to the City. Whilst all six schemes have been included the assessment of overall City supply only the four City managed schemes will be taken into account for the purpose of recommendations and options appraisal.
5. In addition to gathering quantitative information the review has undertaken a literature review, qualitative research, site visits to an extra-care scheme, and extensive consultation with the City's sheltered housing residents and other older City residents. Site visits were undertaken by two other major providers of housing for older people to obtain independent assessments of our sheltered schemes and ensure a balanced perspective on issues and likely future requirements for change. One of these included a detailed assessment of Mais House, our largest sheltered scheme in Sydenham Hill, Lewisham, which is a primary focus for the review. The review has been carried out internally, with support from independent external advisors as necessary, and overseen by a Project Board comprised of City elected Members and DCCS Housing Service senior managers
6. Options for appraisal for approval by Members may include service improvement, changes to service delivery models, disposal and investment and development opportunities presented by the City's asset management strategy and affordable housing development programme. An action plan will be drafted to implement agreed proposals once approved.

Summary of key finding and issues

7. The key findings of the review are summarised below. More detail can be found in the subsequent sections.
 - 7.1. Rising numbers of older people are likely to increase pressure on service but the assessment of future needs is complex; changes in people's aspirations, delivery of care and the choice of suitable alternative provision in the market will all shape the future requirement for sheltered housing.
 - 7.2. Policy and technology are challenging traditional models of sheltered service provision and delivery such as the City's. Some authorities are re-modelling provision to provide more extra-care or mobile warden services to target resources more tightly or across different tenures.
 - 7.3. The current supply of alternative specialist housing for older people in the City consists of sheltered accommodation. The majority of schemes (4 out of 6) and all three City-owned schemes, are on out-of-City estates in neighbouring boroughs; sheltered housing within the City is provided through two housing association-owned schemes to which the City has nomination rights. There is no private retirement or extra-care provision in the City.
 - 7.4. Demand for sheltered accommodation is soft and increasingly being used to meet general needs demand; sheltered housing is less attractive to its original market of fit and active older people; perceptions of sheltered accommodation amongst non-residents are poor.
 - 7.5. Most people want to remain living in their existing homes for as long as possible, especially in the City. High levels of owner-occupation, satisfaction with their existing neighbourhood and the lack of suitable alternatives may be contributing to this, although residents appear disinterested in private retirement housing provision.
 - 7.6. The requirement for extra-care provision in the City is likely to remain low and not an efficient or sustainable option for the City.
 - 7.7. All of the City's schemes require investment to meet current standards. Two schemes – Harman Close and Mais House - are the least popular and require significant investment to refurbish or remodel them in order to make them fit for purpose on the future. Mais House is particularly problematic suffering from a poor location and very low demand.

Context of the review

8. A number of factors are driving change in the way our local housing, health and care services work together to deliver services for older people. Together with issues related to the City's sheltered housing stock condition, these have shaped the focus of the review and will be taken into account in deciding on options for change going forward.

Condition of City sheltered stock

9. All City of London sheltered housing stock was built more than forty years ago and is now visibly ageing. Most of the stock does not meet current standards and will require investment, remodelling or re-provision if it is to meet new and developing design standards for older people's accommodation such as that set out in the HAPPI¹ report, take opportunities for better care and support provided by advances in technology, and meet the aspirations of older people.

Demographic change

10. Demographic change is driving the way we plan fund and deliver health, care and housing provision. The number of people in the UK population is forecast to increase steadily over the next three decades. By 2050, there will be 19 million people over 65, and 8 million over 85, with a significant proportion living alone. Average life expectancy now is 82.6 for women and 78.7 for men, and rising: one in three children born in 2013 will live to be over 100.
11. Life expectancy in the City is the highest in England. But greater numbers of older people living longer may not be matched by healthy life expectancy: at 65 men have a 47 per cent chance of remaining disability free, compared to 42 per cent for women. And living longer significantly increases the risk of dementia; the proportion of people with dementia doubles for every five year age group. As a result, there is likely to be growing pressure on public services, particularly social care and health services, from older people.

Legislative and policy change

12. At a national level the government is shaping the legislative framework to integrate the delivery of health, care and housing policy outcomes and shifting funding towards housing and community-based interventions to support those agendas. Health and Wellbeing Boards are being encouraged to ensure adequate housing representation in the planning and commissioning for the wellbeing of residents. The Care Act 2014 explicitly mentions the suitability of accommodation in shaping wellbeing assessments and sets out duties to co-operate, and has indicated the significance of housing to the preventative agenda in health provision through the inclusion of disabled facilities grant in the Better Care fund.
13. Changes in policy emphasising prevention, choice and person-centred services are driving changes in the funding and delivery of care services and the patterns of provision in care and housing-related support. Policy in care for the elderly is increasingly focused on giving clients control of their own budgets to buy the care

¹ The high-profile **Housing our Ageing Population: Panel for Innovation (HAPPI)** was established in June 2009 to examine what is needed to ensure new build specialised housing meets the needs and aspirations of the older people of the future? <http://www.homesandcommunities.co.uk/ourwork/happi>

they need and maintaining people in their own home for as long as possible. This policy shift, away from residential care and high-cost interventions towards prevention and community-based services (such as extra-care housing for the elderly), is creating change in the way care and accommodation is provided.

Changing patterns of provision

14. Historic models of providing care and accommodation are being reviewed by many local authorities and housing providers. The accommodation-based model of community care in which people move along a continuum of accommodation provision as their need for care increases is being challenged. Many local authorities, driven by reduced funding settlements and the desire to 'de-institutionalise' care provision, have shifted away from residential care in favour of extra-care schemes where residents have their own tenancies and care is purchased and provided on site on a 24/7 basis. In this model the concept of the sheltered scheme warden or manager as 'good neighbour' has evolved into that of professional partner in the allocation, assessment and care delivery system.
15. The 'balanced community' model of sheltered housing in which fit and active residents support frailer ones is being challenged by some authorities, on the grounds of efficiency and use of public funds, and by residents – especially younger and more active ones many of whom do not wish to adopt the role of 'reluctant carer' for neighbours. Newer models of service delivery have sought to combine technology and staff resources in a more flexible or peripatetic way delivering targeted support in the community as and where needed.

Technological innovation

16. Traditional systems rely on community alarm systems that allow residents to summon help in an emergency and improve safety through smoke detectors and automatic door closers. Newer systems that detect risk in the environment (flooding or gas escape from taps left on, excess heat) and in personal circumstances (inactivity and movement detectors, fall sensors, exiting the dwelling) allow these basic functions to be integrated and extended through the use of touchscreen tablets and social media platforms which enable enhanced contact with the outside world, family, care and support.
17. These innovations do not only improve independence and choice for residents and reduce social isolation, anxiety and risks; they also provide opportunities to coordinate and reshape service delivery, reduce costs and make better use of resources, for example by reducing the need for frequent personal calls on residents by wardens or enabling preventive maintenance.

The City's affordable housing development programme

18. The City's housing strategy takes account of the impact of a growing older population in its priorities and commitments. The City's affordable housing development programme and five year asset management strategy provide both the opportunity and the funding to address the housing needs of the elderly in the City and its estates in other boroughs. Improvements to existing stock and the provision of new housing to lifetime standards will create more choice for older people through by enabling them remain in their existing homes for longer or to downsize releasing much-needed larger properties for families.

The spectrum of housing for older people

19. Sheltered housing sits within a wide range of specialist housing for older people for which definitions or descriptions can be complex. Sheltered housing is often called retirement housing (or villages) when provided for market rent or sale in the private sector. Some general definitions are set out below. All housing provision for older people in the City and on the city's estates in neighbouring boroughs is sheltered accommodation. The City does not own or manage any extra-care provision. There are no private retirement villages or care homes in the City. Current policy is focused on reducing the use of care homes where possible, principally through provision of extra-care schemes.

Designated housing for older people

20. This is housing, usually a group of flats, allocated only to older people. It may have specific design features or be in a quiet location. Support is not provided.

Sheltered housing

21. Sheltered housing provides conditions for independent living including the support of a warden and a 24-hour alarm system for emergencies. Schemes are generally groups of self-contained flats or bungalows. Some are all under one roof (hotel-style); others may be groups of bungalows or flats. Most have with communal facilities such as a lounge, laundry and gardens. Scheme managers or wardens provide limited support, such as daily checks on residents, and community activities but not care. Resident wardens are no longer the norm in sheltered housing schemes. Most schemes will have an on-site warden during the day five days per week or a peripatetic (mobile) warden service.

Extra care

22. Extra care housing provides for independent living in schemes comprised of self-contained homes with design features, support services and provision of on-site care. It is sometimes known as assisted living, very sheltered, close care or continuing care.

Retirement communities

23. Retirement communities (or villages) are large scale purpose built developments. They usually provide upmarket accommodation for sale or rent with a wide range of facilities available on site including gyms, cafes, shops and facilities for the provision of care.

Care homes

24. A care home is a residential setting where a number of older people live with and have access to on-site care services. All care homes provide personal care but some also provide nursing care. Residents do not generally have a tenancy of an individual dwelling and usually live in single rooms with access to shared communal facilities.

Housing requirements of older people – aspirations, needs and demand

25. Demographic forecasts suggest large increases in the older population in the City. The overall population is projected to increase by 40% between 2011 and 2026, from 7,400 to 10,370; the increase in the numbers of over 65s is greater at 60%: from 1,140 to 1,840. The number of these people living alone is likely to be disproportionately high in the City – average household size in the city of London is 1.64, the smallest of all English local authorities.²
26. However, other factors such as changing preferences and aspirations, the availability and provision of care, and the market will also shape the likely future requirement for specialist or sheltered housing. Age is not necessarily a firm indicator of the need for specialist or sheltered housing or care; the need and demand for different accommodation and support can be difficult to predict because people may only consider the need for change at a time of crisis. And demand for certain types of accommodation is partly supply-led: need for age-specific accommodation is relative and depends on the choice and attractiveness of other options and services in the market.

Aspirations of older people

27. Nationally, only 5% of older people live in specialist housing. Around 90% live in mainstream housing and research suggests the vast majority want to stay living in their current home for as long as possible. In many instances this would require only small levels of assistive input, including for example the use of assistive technology. This evidence suggests a strong preference for independence and control; it may also reflect the current lack of affordable alternatives in the market or increasing high levels of owner-occupation amongst older people. In any event this trend supports current policy direction in social care and is supported by consultation we have undertaken with our own residents. This is detailed below.

City sheltered residents

28. Many existing sheltered residents are generally happy with their accommodation. In consultation they cited safety, security, support, affordability and companionship as the main benefits. For many, the presence of a scheme manager is the key to ensuring this. However, motivation for the move to sheltered was conditional and varied with tenure.
29. Some, principally those who were already City tenants, suggested that they may have remained where they were living previously if their accommodation had been more suitable in terms of its size and accessibility - for example, smaller and with a lift or on the ground floor. Previous tenants of private rented accommodation highlighted security of tenure, affordability and a better standard of accommodation as key factors. These features are not specific to sheltered accommodation and could in most cases be provided through unsupported general needs provision. Others had moved because their families wanted them to be closer to support or because they did not want to burden their families. For these residents the support on offer was an important consideration.

² This data applies to the City population only. Similar data for the population of City housing elsewhere in London is not available

30. Many sheltered residents were critical of the space and storage standards of their accommodation. This is a common criticism of many sheltered schemes. Particular examples of these deficits in City sheltered schemes are detailed in the next section.

Other City residents

31. City residents not living in sheltered accommodation had less positive perceptions of it (including retirement communities or villages) and the lifestyle it offers. Many cited a number of negative factors leading them to want to remain living where they were. These included loss of independence, fear of institutionalisation, not wanting to be in a community of older people, or the size and standard of accommodation as issues.³ For this group the key requirements in terms of housing needs as they grow older were less related to specialised age-specific accommodation or issues of personal support and companionship, and more focused on provision and services which would enable them to stay where they were: aids and adaptations, good mobility accessibility and handyperson services.
32. Companionship appeared to be less of an issue for this group although some Barbican residents suggested social isolation was an issue. There was some awareness of the potential of telecare to enable independent living and to help combat social isolation, especially for those living alone. This should be promoted.
33. Positive factors underpinning the desire to stay in their current accommodation included proximity to transport, services, cultural facilities and familiarity with the neighbourhood. This group of residents live predominantly in Golden Lane Estate and the Barbican. Many of those consulted expressed the intention never to leave, having actively chosen to move and live there for these reasons.
34. Sheltered housing has become less attractive to its original market of fit and active older people. Whilst the population of 65-79 older people is projected grow, many of them will be in that fit and active target group. In addition, in the City most of that growth will be in the Barbican and Golden Lane areas. Levels of owner-occupation amongst the 65-79 population is likely to be high. When older people move they tend to choose the same tenure they are currently living in. In view of these factors demand from this group for social rented sheltered housing is likely to be low.
35. These positive and negative factors will need to be taken into account in any additional provision or re-provision the City makes for older people if the City is to succeed in increasing choice for older people and encouraging downsizing and greater mobility in the local market as part of its overall housing strategy.

Resident profile, demand and support need

36. The profile of residents in the City's sheltered housing schemes shows a balanced client group. Demand for sheltered housing and the need for care and support in most schemes is relatively low.

³ Research also suggests that fear of change, the upheaval of moving and, for owner occupiers, asset retention, are key considerations.

37. Around 28% of residents are aged 80 or more; around 70% are aged between 60 and 80. This reflects patterns nationally although the numbers of residents under 60 (2%) is below average and has not followed increases in the national trend. Whilst the numbers of the population aged between 60 and 80 in the City are projected to grow more rapidly, the numbers of very old people ie 80+ are projected to grow only slowly (by 8% to 2020).
38. Current levels of demand for sheltered housing are steady but soft. Sheltered schemes have in the past experienced difficulty in letting empty dwellings in some of the less popular schemes. As at August 2014 all schemes are full and there are 96 people on the waiting list for sheltered accommodation. However many people refuse offers when they arise which suggests their application is a form of 'future proofing', an insurance policy for those hoping not to have to move.
39. Demand varies between schemes. There is a clear preference and high demand for 'own front-door' bungalow-type dwellings on schemes most near to the City such as those at Isleden House and City Almshouses. There is also a clear preference for one bedroom accommodation - at present more than 30% of those on the waiting list have expressed a single preference for the City Almshouses. These design features seem likely to be as much a factor in their popularity as the fact that they provide support. Demand for the most distant scheme at Mais House is very low.
40. Care and support needs at most sheltered schemes are relatively low. Overall, only 9% of residents have high support needs and more than 50% have no or low support needs. Around 10% of residents are in receipt of care, lower than national average estimates.
41. The refusal rate and low numbers of people requiring high support suggests sheltered housing is increasingly being used as general needs accommodation to meet the lack of suitable alternatives for those who might wish to move but do not need support. This picture reflects national trends in sheltered housing, especially in ageing stock. Some providers are actively questioning the efficiency of the traditional model of accommodation-based support and are remodelling outdated sheltered schemes into extra-care models of provision to help reduce reliance on costly residential care. However it is unlikely that this model of provision would be efficient or sustainable for the City.
42. The numbers of very elderly City residents is low and projected to increase only gradually. Numbers being placed into residential care are very small (3-4 per year) and are decreasing. Capacity in the City to spot-commission this provision is adequate. Increasing numbers are being enabled to remain living independently through the provision of care directly into the home and the use of personal budgets. This trend and the use of personal budgets are causing some extra-care providers to review the viability of providing large extra-care schemes with the provision of on-site 24/7 care. It should also be noted that the City has a purely landlord function in regard to its sheltered housing schemes, all of which are outside the City. The relatively low number of residents who are in receipt of care are thus funded and provided for by the host boroughs.
43. There is potential however, with advances in assistive technology and in conjunction with decisions about the level and nature of the City's future provision of housing for older people, to review the way housing-related support is provided, for example through a more peripatetic or mobile form of provision.

Sheltered housing supply – profile and stock condition

44. The total supply of sheltered housing across all sectors comprises six schemes providing 235 units of accommodation. Of these 219 are social rented; the remainder are owner-occupied. This represents around 11% of all City social rented stock.
45. Most of the social rented sheltered provision is out of the City. Four of the schemes, providing 191 units are managed by the City and located in neighbouring boroughs. Three of these (Harman Close, Isleden House and Mais House) are owned by the City. Two of the schemes are owned by housing associations (Hanover and Guinness Trust). These provide 28 units of accommodation through nomination rights granted to the City and are located in the City. The Iveagh Court scheme owned by Guinness Trust and providing nine units of accommodation is being decommissioned. The vacancy rate across City sheltered housing is currently around 20 a year.
46. All six schemes have community alarm systems and alarm monitoring services supported by an emergency call-out service at night if needed. All have staff on-site during the day across the working week.
47. More details on the size, location and provision at these six schemes is provided at Appendix A.

Condition and quality of provision

48. Most of the City-managed schemes provide a wide range of communal facilities. All four sheltered schemes have a garden. The three schemes owned by the City (Isleden House, Harman Close and Mais House) also provide communal lounges, laundries and kitchen areas.
49. All of the City's sheltered stock is now more than forty years old and outdated. There has been some investment and improvement over the years but none of the schemes meets current design and space standards. There are only two wheelchair accessible units and an over-provision of bed-sitter accommodation within the stock (58% of all dwellings) which is generally of a poor size, poorly configured for walking aids and unpopular with residents for whom privacy, space for guests to sleep and additional storage space are prime considerations.
50. Demand for City Almshouses and Isleden House is much higher than Harman Close and Mais House. These two latter schemes are a priority for re-investment or remodelling. The key features and issues with these schemes are summarised briefly in the following sections.

City Almshouses and Isleden House

51. There are few pressing problems with either of these schemes. The schemes are relatively near to the City and both offer bungalow-style 'own front door' dwellings, all at ground floor level. These are considered to offer more privacy and independence and are highly popular with their residents. Space standards at both schemes are superior to schemes at Harman Close and Mais House. All dwellings at the City Almshouses provide one bedroom accommodation. Two in

three dwellings at Isleden are bedsitters but these are designed to allow easy screening and partitioning which increases privacy.

52. Dwellings at both schemes are on the ground floor and open directly onto a garden for the exclusive use of residents. Dwellings at Isleden have an additional small balcony style garden area. Isleden House has a communal lounge and a laundry. Construction of a new community facilities at the Almshouses are planned for November 2014.
53. Isleden House benefits from being part of a general needs estate in which the 'move down' from the general needs provision units to the sheltered scheme was envisaged as part of the original design. This limits the upheaval and dislocation associated with more distant relocation and provides potential for continued support and inter-generational activity within the community.
54. High demand for these schemes means that they are not a priority for investment but the City should develop an investment plan for Isleden House to ensure it complies with current design and accessibility standards.

Harman Close and Mais house

55. These schemes are more distant from City, although Harman Close benefits from being located on a general needs estate and is close to transport links and local services and amenities. In contrast Mais House is located on a hill and is relatively distant from services and amenities –shopping facilities are more than a mile away and reliance on public transport is necessary to access them.
56. Both schemes are 'hotel-style' schemes. This style is popular with some residents but can create an institutionalised feel with long narrow internal corridors. The shared circulation spaces and layouts no longer meet current design standards. Long narrow circulation areas and the need for residents to ensure main doors are closed when exiting and entering can make this style of scheme unsuitable for residents with dementia, mental health or substance abuse problems.
57. A large majority of the dwellings at both Harman House and Mais House are bedsitters. Kitchens and bathrooms in both schemes are small, poorly laid out and no longer meet current standards.
58. A more detailed assessment of Mais House indicated kitchens and bathrooms to be original installations, lacking modern features such as grip rails and easy storage; bathrooms do not provide level-access or walk-in bathing facilities. Windows have not been replaced and are now energy inefficient. A number of systems and installations such as the warden call, communal lighting and boiler systems are inefficient by current standards or are reaching the end of their useful life and will require replacement in the near future. External areas at Mais suffer from changes in level across the site.

Appendix A

Scheme Name & Location	Managed by	Number of Units				No. units CoL lets	Design	Floor (inc. Grd)	Lift	Door entry	Communal areas & parking	Wheelchair accessible	Community Alarm
Mais House Lewisham	City of London	49	11*	1	61	61	Hotel style	4	Y	Y	Garden Lounge x3 Kitchen Laundry Parking	Common Areas 1 unit	Y
Harman Close Southwark	City of London	39	8	0	47	47	Hotel style	3	Y	Y	Garden Lounge x2 Laundry	Common areas	Y
Isleden House Islington	City of London	22	10	1	33	33	Single dwelling	Grd floor	n/a	n/a	Garden Lounge Laundry	Common Areas 1 unit	Y
City of London Almshouses Lambeth	City of London	0	50	0	50	50	Single dwelling	Grd floor	n/a	n/a	Garden Communal hall from Nov 2014	Communal hall 0 units	Y
Tudor Rose Ct City of London	Hanover HA	0	31	4	35	19	Hotel style	6	Y	n/a	Garden Lounge Kitchen Laundry	Common Areas 19 units	Y
Iveagh Court City of London	Guinness Trust	0	9		9	9	Single dwelling deck access		N			0	Y
Totals					235	219							

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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