
Briefing Report

Overview Select Committee

Private Rented Sector Housing – Corporate Offer

Corporate Priorities for a holistic, balanced approach to issues arising from within the Private Rented Sector

Overview Select Committee: 10th November 2021

Lead Assistant Mayor: Cllr Elly Cutkelvin (Housing & Education)

Lead Strategic Director: Richard Sword

Lead Directors: Chris Burgin & John Leach

Useful information

■ Ward(s) affected: All

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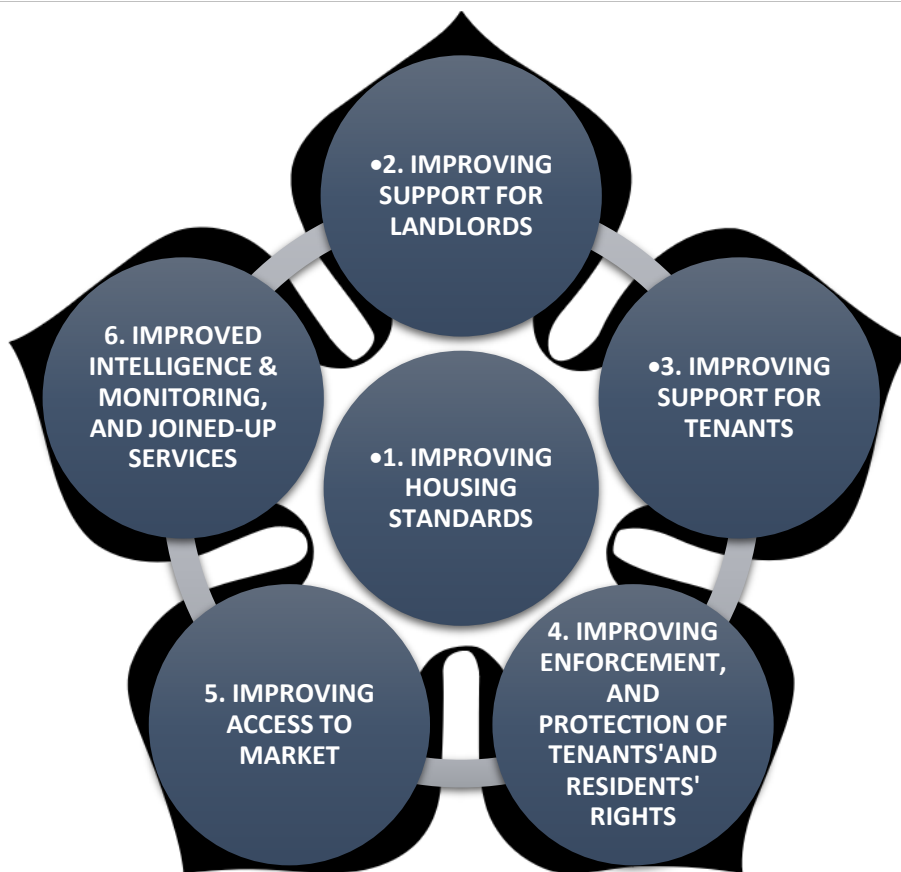
1. PURPOSE

1.1. The purpose of this report is to:

- Brief Members of the Overview Select Committee on strategic plans for undertaking work within Leicester city's private rented sector.

2. EXECUTIVE SUMMARY

- 2.1. The City Council have an ambition to ensure the private rented sector in Leicester is fit for purpose and to address where this is not the case by raising housing standards.
- 2.2. The overall objective of the strategy is to have a holistic approach that ensures tenants and landlords are appropriately supported, as well as retaining and improving our ability to protect tenants' safety and rights, and tackle rogue/poor landlords. Maximising this, whilst maintaining a balanced, fair, and proportionate approach, will ultimately lead to the raising of housing standards within the sector.
- 2.3. It is also a key objective to be able to access the sector in greater numbers in order to find good quality housing solutions for those in need, resulting from pressures on homelessness services and on the Housing Register that cannot be met with social housing alone.
- 2.4. The City Council also have duties to assist tenants with matters related to breach of rights, safety within the home, and threats of homelessness.
- 2.5. This briefing sets out several new areas of work, alongside existing and revised objectives, focusing on six high-level priorities, with one central principle objective at the core – improving housing standards in Leicester's private rented housing sector:



- 2.6. One major tool available to local authorities to improve housing standards is the use of licensing, but must be used proportionately, and cautiously.
- 2.7. Each objective within the strategy is supported by identified workstreams. The majority of workstreams can be accommodated with no additional pressure on LCC budgets, either being funded via grants, or absorbed via repurposing of existing resources within respective service areas. This is covered in more detail at Section 5, and then in full detail within Appendix 1.
- 2.8. Appendix 2 shows an indicative timeline for the strategy objectives, covering a period from 2020/2021 to 2024/2025. Work in some areas is already underway.

3. RECOMENDATIONS

- 3.1. Members of the Overview Select Committee are recommended to;
 - 1. Note the content of this report and provide any comment/feedback.

4. BACKGROUND

Housing Standards & Compliance

- 4.1. The City Council’s ambition to ensure the Private Rented Sector in Leicester is fit for purpose (and within that standards are improved in those areas where there are concerns) is clearly set out as a Priority in the City Mayor’s manifesto. Metrics on work undertaken can be found at Appendix 1.

- 4.2. A housing stock condition report for the City has been produced by the BRE which identified there are 142,379 dwellings in Leicester, 43% are owner occupied, 35% private rented and 22% social rented. The report is helpful in terms of informing an intelligence led approach to stock improvement in the private rented sector. This work is considered alongside current service information and of course it is important to recognise that the approach of engaging, explaining and encouraging compliance is deployed in order to only use enforcement when that is necessary. Compliance is the overall objective leading to improved standards.
- 4.3. Housing is responsible for 33% of carbon emissions in Leicester and in line with the council's Climate Emergency Response this strategy will help tackle poor energy efficiency within the private rented sector.
- 4.4. The adoption of a Licensing Scheme has been considered in-line with the Council's Manifesto commitment. Its purpose is to enable the Council to impose additional licensing conditions and implement an intervention programme that targets existing or emerging problems associated with concentrations of privately rented accommodation.

Impact on Communities

- 4.5 In areas where there is a predominance of private rented sector housing that is being poorly managed by certain landlords, a number of community concerns can emerge that lead to the decline or feeling of decline within an area. Such decline can be seen physically and reflected in the movement of people into and out of an area, that does not encourage a sense of well being and belonging within communities.
- 4.6 The types of issues that impact on communities from poorly managed private rented stock include fly tipping, issues regarding bins being left on streets, anti-social behaviour, noise nuisance, unkept and filthy gardens leading to potential vermin infestations etc. Not only do these matters relate to environmental health concerns they also have an interplay with how people view and feel about the area they live in. Such environments may show a high churn in tenancies and therefore provide a reduced chance for a sense community that builds community cohesion amongst its residents.
- 4.7 Conversely well managed private rented sector properties can provide an attractive residence that adds value to areas and encourages behaviours that sustain peoples interest and desire to stay, invest and raise their families within.
- 4.8 Actions to improve the standard of private rented sector housing within an area, as set out in this strategy, encourage sustainable communities to thrive for the betterment of the overall locality and its surrounding environs.

Planning Alignment

- 4.9 Planning policies relating to housing development and standards is being reviewed as part of the new Local Plan. This will include a number of improved policy controls related to housing provision, condition and delivery which will impact upon the private rented sector and should assist delivery of and complement the PRS strategy objectives. Of particular note are the following policy areas:
 - Arrangements to meet housing need targets including negotiation with adjacent districts, Registered Providers, Homes England and MHCLG
 - Policies to secure appropriate housing design

- Policies to secure appropriate housing mix including affordable housing development (s.106) including accessibility and adaptability standards subject to viability.
- Policies to meet the housing needs of different communities identified in the NPPF and findings in the Local Housing Need Assessment
- Delivery of housing site allocations
- Adoption of the Nationally Described Space Standards
- Policies to protect amenity of occupiers and adjacent residents
- Policies to deal with Houses in Multiple Occupation and the associated impacts

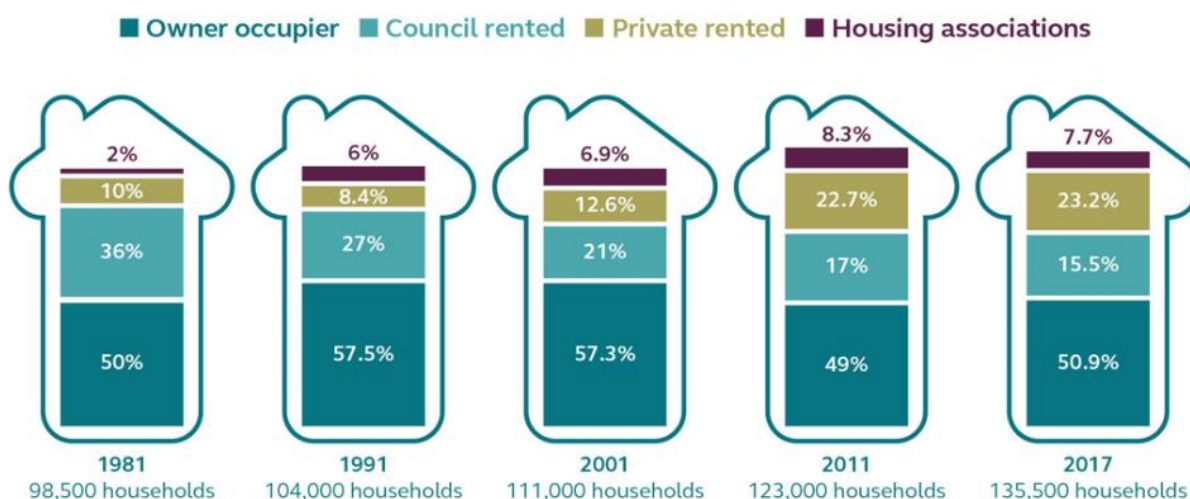
4.10 The Private Rented Sector will continue to be engaged through consultation on the planning policy development process.

Homelessness and Housing Need

4.11 The Council's Homelessness & Rough Sleeping Strategy¹, referenced in the City Mayor's objectives, is clear that preventing people from losing their homes is a top priority.

4.12 Over the past 10 years we have seen a gradual increase in approaches from households within the private rented sector, with the exception of 18/19 to 19/20 which saw a small reduction.

4.13. This is likely due to the changing nature of housing within the city, and nationwide. The graphic overleaf shows the changing make-up of the city, and the growth of the private rented sector, filling the gap left behind by diminishing council stock.



4.14. At point 3.2 it was stated that the 2020 figure now puts private rented accommodation even higher, at 35%.

4.15. In 2019/2020 there were 740 homeless applications arising from approaches by private rented sector tenants. This accounts for around a quarter of all threats of homelessness.

¹ <https://www.leicester.gov.uk/media/88282/homelessness-strategy-2018-2023.pdf>

- 4.16. Around 95% of these households presented as a result of receiving a notice to quit from the landlord.
- 4.17. There are a number of reasons why landlords seek to take back possession of the property, for example tenant-landlord disputes over disrepair, affordability issues, rent arrears. In many cases these matters are not as a result of fault by the tenant, and can often be resolved if addressed early. If left late, however, resolutions can be difficult to reach and/or landlord-tenant relations may have broken down to an irreconcilable state.
- 4.18. In 2019/2020, 80% of the households referenced above were provided with housing solutions. Around half of these solutions were as a result of sustaining current accommodation². The remaining solutions were as a result of providing a new accommodation solution. Further breakdown of metrics can be found at Appendix 2.
- 4.19. The Housing Register is overwhelmed by demand, and cannot act as a solution in many cases where time is of the essence. Sustainment of suitable accommodation is key to reducing the demand on the housing register to ensure that supply of social housing reaches those who need it most. In turn, timely notification from landlords/tenants, and timely action is key to successful sustainment.

Right to quiet enjoyment

- 4.20. In some instances, landlords' actions can breach the tenants' rights under the Protection from Eviction Act 1977. The council have seen a rise in private sector tenant complaints about illegal eviction and landlord harassment, with this type of presentation more than doubling since 2016/2017.

PRS as a housing solution

- 4.21. Further to reducing demand through sustainment, it is essential that the private sector is utilised fully to provide a supply of housing solutions.
- 4.22. In 2019/2020, 201 tenancies were created through the council's landlord incentives and leasing schemes. This was an increase from approximately 170 tenancies in 2018/2019. This was achieved through piloting improvements to incentives, and working more flexibly to the needs and wishes of local landlords.
- 4.23. It will be essential to continue to build on this success as social housing within the city continues to diminish, primarily as a result of Right to Buy.

5. ACHIEVING PRIORITIES – CONTRIBUTORY WORKSTREAMS

- 5.1. Delivery of each priority is supported by a package of workstreams.
- 5.2. In addition to the following workstreams the strategy as a whole will require programme management to coordinate workstream leads and Board priorities and outcomes. This will be absorbed within the Housing Transformation Team, although funding for a Business Change Manager for a period of 3 months would be required to complete initial set-up, and to produce a public-facing strategy document from this report. This will create a one-off cost of £15,000 (including on-costs) which will be covered from reserves.

² It should be noted here that LCC compare favourably on 'sustainment' when benchmarked against national figures, with 57% of homelessness preventions (all types of presentation) being achieved through sustainment compared to 37% as the national average.

5.3. With regard to the workstreams, a significant number will be achieved without any additional financial pressure on the local authority, achieved instead by absorption into, or re-organisation of, existing structures, or by Grant funding received by the local authority. These include:

5.4. **Priority: Improving housing standards across the sector by:**

O.1.1	Introducing better ways of reporting issues, for example the new online form to 'Report Unlicensed HMOs' which allows members of the public or tenants to report an un-licensed HMO, which can then be inspected <i>See Appendix 1 - O.1.1, for detail.</i>	To be undertaken within existing / repurposed resources.
O.1.2	Making better use of Landlord Accreditation Schemes, to improve the condition and management of the private rented sector in Leicester. <i>See Appendix 1 - O.1.2, for detail.</i>	To be undertaken within existing / repurposed resources.
O.1.3	Continuing work to bring empty homes back into use and occupation <i>See Appendix 1 - O.1.3, for detail.</i>	To be undertaken within existing / repurposed resources.
O.1.4	Increase the take-up of Disabled Facilities Grants (DFGs) within the sector <i>See Appendix 1 - O.1.4, for detail.</i>	To be undertaken within existing / repurposed resources.
O.1.5	Consider the viability and benefits of extending Repayable Home Repair Loan into the private rented sector <i>See Appendix 1 - O.1.5, for detail.</i>	To be undertaken within existing / repurposed resources.
O.1.6	Carry out a range of planning-based initiatives to improve housing design, distribution and delivery and manage impacts of concentration of HMOs and other housing typologies <i>See Appendix 1 - O.1.6, for detail.</i>	To be undertaken within existing / repurposed resources.
O.1.7	Senior Environmental Health Officer (SEHO) to co-ordinate Operations such as Operation EPC, Operation Mandarin, and the Compliant Landlord Taskforce. <i>See Appendix 1 - O.1.7, for detail.</i>	This represents a cost of £53k per annum, which can be absorbed within existing staffing budgets.
O.1.8	Establishing a programme of works around pro-actively ensuring that properties are meeting energy efficiency standards – Operation EPC <i>See Appendix 1 - O.1.8, for detail.</i>	To be undertaken within existing / repurposed resources. See 5.11 in the event of mainstreaming, as resource requirement would arise.

5.5. **Priority: Improving support available for private sector landlords by:**

O.2.1	Introducing a centralised bank of information on grants and incentives for landlords, to enable a range of improvements e.g. Green Homes Grant. <i>See Appendix 1 - O.2.1, for detail.</i>	To be undertaken within existing / repurposed resources.
O.2.2	Introducing a dedicated section on leicester.gov.uk that provides a range of resources for landlords e.g. information about legal obligations & eviction processes <i>See Appendix 1 - O.2.2, for detail.</i>	To be undertaken within existing / repurposed resources.
O.2.3	Re-launching the Leicester Landlord Forum with improvements to ensure it is meeting the needs of local landlords <i>See Appendix 1 - O.2.3, for detail.</i>	To be undertaken within existing / repurposed resources.
O.2.4	Introducing a 'Call Before You Serve' model to allow for timely and pro-active sustainment of tenancies and prevention of eviction <i>See Appendix 1 - O.2.4, for detail.</i>	To be undertaken using the Homelessness Prevention Grant – funding identified within 22/23 grant (O.2.4, O.3.2, O.4.2, combined – identified £175,000). Breakdown can be seen at <i>Appendix 1 - O.2.4.</i>

5.6. Priority: Improving support available for private sector tenants by:

O.3.1	Introducing a dedicated section on leicester.gov.uk to provide a range resources and information for tenants e.g. advice about property condition, tenants' rights and eviction/homelessness, template letters for them to report concerns to landlords <i>See Appendix 1 - O.3.1, for detail.</i>	To be undertaken within existing / repurposed resources.
O.3.2	Creating a specialist PRS Housing Advice / Homelessness Prevention Team <i>See Appendix 1 - O.3.2, for detail.</i>	To be undertaken using the Homelessness Prevention Grant – funding identified within 22/23 grant (O.2.4, O.3.2, O.4.2, combined – identified £175,000). Breakdown can be seen at <i>Appendix 1 - O.2.4.</i>
O.3.3	Extending the existing Floating Support Provision to provide wider cover and greater support for Tenants within the private rented sector <i>See Appendix 1 - O.3.3, for detail.</i>	To be undertaken using the Homelessness Prevention Grant – funding identified within 22/23 grant (£20,000).

5.7. Priority: Improving sector enforcement, and protection of tenants' / residents' rights by:

O.4.1	Continuing to establish the new "Corporate Landlord Taskforce" – a partnership / multi-agency approach to dealing with rogue landlords	To be undertaken within existing / repurposed resources.
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O.4.2	<p>See Appendix 1 - O.4.1, for detail.</p> <p>Improving the Council's level of involvement in enforcement of rights within Protection from Eviction 1977 – Unlawful Eviction, Landlord Harassment, Breach of Quiet Enjoyment</p> <p>See Appendix 1 - O.4.2, for detail.</p>	<p>To be undertaken using the Homelessness Prevention Grant – funding identified within 22/23 grant (O.2.4, O.3.2, O.4.2, combined – identified £175,000). Breakdown can be seen at Appendix 1 - O.2.4.</p>
<p>5.8. Priority: Improving access to market in order to resolve housing need by:</p>		
O.5.1	<p>Launching recent improvements to LCC's PRS Incentive Schemes</p> <p>See Appendix 1 - O.5.1, for detail.</p>	<p>To be undertaken within existing / repurposed resources.</p>
<p>5.9. Priority: Improving 'joined-up' services around enforcement and support, joint intelligence & joint monitoring by:</p>		
O.6.1	<p>Establishing co-location of appropriate cross-Divisional teams as part of COVID-19 recovery plans, in order to reap organic benefits from proximity and development of relationships</p> <p>See Appendix 1 - O.6.1, for detail.</p>	<p>To be undertaken within existing / repurposed resources.</p>
O.6.2	<p>Establishing a method of cross-Divisional intelligence collection (inc. potentially establishing regular and in-depth sector analysis) & sharing</p> <p>See Appendix 1 - O.6.2, for detail.</p>	<p>To be undertaken within existing / repurposed resources.</p>
<p>5.10. Taking this further will require implementing new initiatives at cost. These include:</p>		
O.5.2	<p>Potential implementation of leasing scheme for 1-bed & shared accommodation.</p> <p>See Appendix 1 - O.5.2, for detail.</p>	<p>- Potential to cover this pressure from homelessness-related Grant Funding from Ministry of Housing. This is currently being explored with a potential bid. Failing this, we will review available options before seeking a decision on next steps.</p> <p>(See Appendix 1 - O.5.2, for detail on estimated costs.)</p>
O.6.2	<p>Improved sector intelligence.</p> <p>See Appendix 1 - O.6.2, for detail.</p>	<p>- Work is underway to identify the most appropriate route for undertaking this work, and whether capacity exists within current teams</p>

O.1.9	Dependent on a review of key evidence; establishment of a licensing scheme, bolstered by additional enforcement measures, for key parts of Leicester City. <i>See Appendix 1 - O.1.9, for detail.</i>	- Any scheme would rely on income generation in order to balance out costs and become self-sustainable. A business case would be created for review ahead of any decision being sought, and would follow the governance flow detailed in Appendix 3, starting with review by the Board.
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5.11. We are working to investigate alternative sources of funding and opportunities to work with partners to deliver the objectives listed in 5.11 with minimal impact and pressure on the General Fund. Where this is not possible and a pressure would arise on the general fund if taken forward, each initiative will be appraised for cost/benefit in separate reports before a decision is sought via the governance system detailed at Appendix 3, beginning with challenge from the Board.

6. BENEFITS – TO LANDLORDS, TO TENANTS / PROSPECTIVE TENANTS, & TO THE COMMUNITY

6.1. The objectives sought in this strategic approach will have numerous benefits, as outlined below:

To landlords

- 6.2. Landlords without membership to associations, and without other means, often have to self-educate and independently keep up to date with what can be complex and fast-paced changed. Landlord will benefit from the improved educational materials made available, empowering them to be the best possible landlords and provide excellent services to tenants - as we know this desire is by far the norm amongst private sector landlords.
- 6.3. Improved and more frequent Forums and Liaison Meetings will improve the council's engagement with the landlord community. This will ensure that the 'voice' of the Landlord & Managing Agent (along with the local communities they often represent) is heard, and remains a strong central consideration as the strategy is implemented, and as future initiatives are developed.
- 6.4. Offering landlords a 'port of call' for failing tenancies, with financial and other assistance to relieve issues, will not only lead to better prevention of homelessness, but will ensure that matters are able to be raised and solved much earlier, so that landlords do not suffer from income loss, and have support, when needed, to tackle difficult tenant-relationships.

To tenants and prospective tenants

- 6.5. Increased enforcement where poor and non-compliant landlord behaviours arise within the sector will ensure that tenants benefit from improved housing standards, safer homes, and better quality of life including;
- 'Quiet enjoyment' of property as a result of improved enforcement of the Protection from Eviction Act 1977
 - Improved family life, health and wellbeing, & educational attainment standards as a result of better housing conditions.

- Reduced poverty as a result of improved housing conditions and improved energy efficiency, resulting in lowered costs of living related to housing utilities.
- 6.6. Tenant will also benefit from the improved educational materials made available to landlords and tenants as better educated landlords will result in fewer risks and issues within the sector, along with tenants themselves being empowered with information on their rights and how to enforce them.
- 6.7. Improved homelessness services for tenants being evicted from within the private rented sector will give tenants the best possible chance to avoid homelessness and ideally sustain their current accommodation. This means;
- Increased rates of tenancy sustainment and prevention of homelessness within the private rented sector via support and assistance delivered by an expert team
 - Consequently, a reduction in homelessness originating within the sector, and a lowering in the use of temporary accommodation, and related cost, leading to further improvement across family life, educational standards and attainment, health and wellbeing, poverty reduction
 - Robust advocacy for persons within the private sector whose rights are being infringed by poor or rogue landlord behaviour – increased enforcement of protection from eviction rights, and right to quit enjoyment free from landlord harassment
 - Future-proofed homelessness prevention services, ready for complex sector changes, for example, potential rescindment³ of Section 21⁴ and other potential reforms to the sector.
- 6.8 In relation to landlord licensing;-
- Good tenants will be more inclined to want to live in the selective licensed or additional licensed areas as they will know that properties are well managed.
 - Improved ability to identify and tackle poor landlords and managing agents; which will benefit tenants.
 - There will be increased confidence of tenants to report issues as licensing can help reduce the fear of eviction/bad management practice.

To the wider community

- 6.9. Increased licensing, introduction of accreditation, along with specialist oversight on enforcement / compliance operations, will lead to improved housing conditions, and better access to good accommodation.
- 6.10. Increased access to the private rented sector as a solution to housing need will lead to better housing outcomes, reductions in the need to use temporary accommodation, and will relieve some pressure from the housing register (consequently slowing the increase in waiting times).

³ [The end of 'no fault' section 21 evictions - House of Commons Library \(parliament.uk\)](https://www.parliament.uk/library/research-briefings/2018/06/2018-06-13-the-end-of-no-fault-section-21-evictions)

⁴ Section 21 (no defence) Notice to Quit - Housing Act 1988, section 21(1) and (4) as amended by section 194 and paragraph 103 of Schedule 11 to the Local Government and Housing Act 1989 and section 98(2) and (3) of the Housing Act 1996

- 6.11. Bringing empty homes back into use and removing eyesores from the cityscape. Consequently, encouraging economic investment in the city.
- 6.12. The introduction of easier and better methods of reporting issues to LCC will empower local communities, as well as having sight of educational materials related to what can and should be reported.

7. MONITORING

- 7.1. Each workstream will have associated performance measures, and will be monitored by divisional directors. The strategy as a whole will have a set of key performance indicators to allow for high-level monitoring by the Lead Members and relevant scrutiny commissions:

	Baseline	Target direction
Compliance and Standards		
Number of mandatory licensed HMOs	930	Increase
Compliance rate – number & % of PRS with Cat 1 (HHSRS) Hazards	8571 (17%)*	Decrease
Number of repeat complaints re landlords across the council	tbc	Decrease
Accredited HMOs	tbc	Increase
Homelessness & Housing Need		
Tenancies created via Incentive Schemes	200	Increase
PRS Tenancy sustainment	45%	Increase
Prevention interventions resulting in homelessness	15%	Decrease
Reduction in temporary accomm use	tbc	Decrease
Reduction in non-budgeted temporary accomm cost	tbc	Decrease

*Source: BRE Report

- 7.2. It should be noted that the next steps would involve establishing specific targets in addition to target direction, in order to better measure progress against KPIs.
- 7.3. Work will also be undertaken to benchmark with other comparable local authorities where possible (dependency on limited public data).
- 7.4. In addition to these performance indicators, we will also be able to infer progress and need for further / additional action by monitoring key contextual data. All of the data below can be produced on a Ward-Level to enable focussed monitoring, where required.

Monitoring		
No	Indicator	Deliverable
Please note that any of the below Indicators can be over laid with other data sets as required		
1.	Numbers of available dwellings within the city	<ul style="list-style-type: none"> Monitoring increase/speed of increase of housing stock within the City
2.	Types of available dwelling within the city	<ul style="list-style-type: none"> Monitor the changing/developing housing market within Leicester City Allow identification of HMO properties and location concentrations Overlay this data with external data sets to link issues to property type
3.	Ward share/spread of dwelling types	<ul style="list-style-type: none"> Monitoring increase rise/fall and ward location of types of housing in locations

4.	Number of category 1 hazards within the private rented sector properties and their type and concentrations	<ul style="list-style-type: none"> ○ Monitor effectiveness of education and targeted enforcement programmes on housing condition ○ Monitor hot spot locations ○ Monitor housing types linked to hazards ○ Overlay this data with Landlord information to assess patterns
	Number of dwellings (by type) who have an EPC at E or lower	<ul style="list-style-type: none"> ○ Independent monitoring of energy performance of City dwellings generally and by type ○ Share this information to ensure rented homes reach the required legal standard
	Average Simple SAP rating by location and property type	<ul style="list-style-type: none"> ○ Monitor SimpleSAP increase/decrease and linkages to fuel poverty and energy efficiency ○ Monitor SimpleSAP increase/decrease in HMO properties ○ Target resources/share information with key areas for holistic/corporate approach to less energy efficient homes
	Fuel poverty locations within the City	<ul style="list-style-type: none"> ○ Monitor locations of fuel poverty and improvements/changes ○ Target resources/share information with key areas for holistic/corporate approach to fuel poverty in households
	Low income household locations and property types	<ul style="list-style-type: none"> ○ Monitor concentrations/changes and property type linked to low income households ○ Target resources/share information with key areas for holistic/corporate approach to local income households

8. FINANCIAL, LEGAL, EQUALITIES, CLIMATE EMERGENCY AND OTHER IMPLICATIONS

8.1. Financial implications

As detailed in the report, most of the work associated with the Private Rented Sector offer will be absorbed within existing budgets. £195k of funding from the Homelessness Prevention Grant has been earmarked for the creation of a PRS Team, implementing a 'Call Before you Serve' model, and extending the existing Floating Support Provision.

Further work will be required to establish the costs and potential funding for an extended leasing scheme with HomeCome for 1-bed properties. Any additional/selective licensing scheme would need to be self-financing, and this will be the subject of future reports to the Executive.

Stuart McAvoy – Principal Accountant

8.2. Legal implications

There are no specific legal implications arising as a direct result of this report.

Jeremy Rainbow – Principal Lawyer (Litigation) - Ext. 371435

8.3. **Equalities implications**

Under the Equality Act 2010, public authorities have a Public Sector Equality Duty (PSED) which means that, in carrying out their functions, they have a statutory duty to pay due regard to the need to eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act, to advance equality of opportunity between people who share a protected characteristic and those who don't and to foster good relations between people who share a protected characteristic and those who don't.

Protected Characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

This report gives an overview on strategic plans for undertaking work within Leicester city's private rented sector, it focusses on six high-level priorities with the aim of improving housing standards with each being supported by identified workstreams. The work carried out under these priorities should lead to positive outcomes for people from across a range of protected characteristics.

Whilst the strategy is a strategic overarching document, the six high-level priorities and associated workstreams need to ensure equality considerations are embedded throughout them and it is recommended that Equality Impact Assessments (EIAs) are carried out as appropriate on identified areas within the workstreams, such as changes to policies/services/organisational change, to ensure any impacts are identified and addressed, and mitigating actions put in place.

The equality impact assessment is an iterative process that should be revisited throughout the decision-making process and updated to reflect any feedback/changes due to consultation/engagement as appropriate.

Further advice and guidance can be sought from the Corporate Equalities Team.

Sukhi Biring, Equalities Officer, 454 4175

8.4. **Climate Emergency implications**

Housing is responsible for 33% of carbon emissions in Leicester, with PRS housing often the worst performing tenure in terms of emissions. Following the city council's declaration of a Climate Emergency in 2019, and it's aim to achieve carbon neutrality, addressing housing-related emissions is therefore a vital part of the council's work, and this is noted as an objective within the strategy. A number of the existing and proposed pieces of work outlined in this report will assist in this goal.

Wherever possible other projects should also look from their earliest stages for further opportunities to reduce emissions and enable analysis of the their carbon impacts. This includes opportunities to provide support and advice to both tenants and landlords on measures such as improved insulation, efficient appliances and lighting, low carbon heating and renewable energy technologies. Additionally, many of the opportunities to reduce carbon emissions may also provide further co-benefits in terms of reduced fuel poverty and costs and improved health and wellbeing.

Aidan Davis, Sustainability Officer, Ext 37 2284

9. Is this a private report (If so, please indicate the reasons and state why it is not in the public interest to be dealt with publicly)?

No

10. Is this a “key decision”? If so, why?

Yes.

Significant in terms of its effects on communities living or working in two or more wards in the City.

11. Appendices

- Appendix 1 – Strategy Content - detail
- Appendix 2 – High Level Sequence
- Appendix 3 – High Level Governance Structure Chart
- Appendix 4 – Community Safety Service Information
- Appendix 4a – Key Findings and Monitorable Elements from BRE Report
- Appendix 5 – Homeless Services Information

APPENDIX 1 – EXPANDED DETAIL ON STRATEGY CONTENT

Important note: Costings outlined in this section are indicative.

Ref	Item	Benefits & Measures	Addition resource requirement & Indicative timeline
OBJECTIVE 1: Improving housing standards across the sector			
Could be accommodated within existing resources:			
O1.1	<p>Improved mechanisms for members of the public to report identified PRS matters <i>Lead Area: Community Safety & Protection</i></p> <p>Related to O2.1, O2.2, and O3.1 (Landlord and Tenant webpages), work will be undertaken to create better ways of reporting issues via online forms from PCs or from mobile phones.</p> <p>An example of where this work has already proven successful is the un-licensed HMO reporting tool. A FirmStep on-line form was developed to allow members of the public or tenants to report an un-licensed HMO with a view to alert LCC so an inspection can take place by an environmental health officer.</p> <p>This resource should be positioned adjacent to educational material on the website developed as part of O2.1, O2.2, and O3.1 such that members of the public can better understand matters that should be reported, and how they identify them.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> Increased reporting leading to; <ul style="list-style-type: none"> better housing standards safer homes increased mandatory HMO licensing <p>Measures:</p> <ul style="list-style-type: none"> Increased service requests (<i>source: Analysis of service data</i>) Increased enforcement actions taken (<i>source: Analysis of service data</i>) Increased numbers of licensed HMOs (<i>source: Analysis of service data</i>) 	<p>Indicative costs: None.</p> <p>Indicative timeline: Q3/4 2021/2022</p> <p>Next Step: Specification of forms.</p>
O1.2	<p>Landlord Accreditation Scheme, to improve the condition and management of the private rented sector in Leicester. <i>Lead Area: Community Safety & Protection</i></p> <p>A scheme will encourage, acknowledge and actively promote good standards of privately rented accommodation with the aim of assisting Landlords, Letting Agents and tenants to undertake their respective responsibilities.</p> <p>The least resource intensive route would be for the scheme to be delivered/offered by a third party such as EMPO or DASH. The Council is a member of DASH who offer an accreditation process as part of our membership contribution. As such, it would be prudent to consider DASH as a strong option. Process would be to council to signpost potential landlords who want to operate in Leicester to the partnered accreditation scheme. Prior to awarding an HMO license to a landlord, the council could stipulate that an accreditation (e.g. DASH, EMPO) must be attained.</p> <p>An in-house scheme would be very resource intensive and unnecessary given the above.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> Establishment of an acceptable baseline for housing conditions. Improved housing conditions throughout the city (better and safer homes) <p>Measures:</p> <ul style="list-style-type: none"> Increase in the number of accredited HMO <p>Reduction in repeat complaints regarding rogue landlords across the Council</p>	<p>Indicative costs: If we were to use DASH, there would be no additional cost as included in services already procured.</p> <p>Indicative timeline: Q2 2021/2022</p>

O1.3	<p>Bringing Empty Homes back into use <i>Lead Area: Housing Development</i></p> <p>A continued drive to ensure empty homes are brought back into use and occupation. This will provide much needed residential accommodation, and helps to replenish the housing stock.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> removes 'eyesores' within the city and makes Leicester a more pleasant place to live and work prevents further deterioration of properties currently in reasonable/good condition improves the local economy and environment reduces resident and Member complaints <p>Measures:</p> <ul style="list-style-type: none"> Target performance measures met (<i>source: Analysis of service data</i>) 	<p>Indicative costs: None.</p> <p>Indicative timeline: N/A – Ongoing</p>
O1.4	<p>Increase the take-up of Disabled Facilities Grants (DFGs) within the sector <i>Lead Area: Home Improvement Team</i></p> <p>Often tenants in private rented accommodation are unaware that they can apply for a DFG to provide adaptations to their current home.</p> <p>We need to:</p> <ul style="list-style-type: none"> Make landlords aware that DFG funding is tenure blind and that their tenants can apply for a DFG and the implications this has for them as the property owner. Make tenants in private rented accommodation that have a need for a DFG and are trying to secure alternative accommodation that they should consider applying in their current home. 	<p>Benefits:</p> <ul style="list-style-type: none"> Safer homes Improvements to meeting health needs, and better quality of life Relieves pressure from the housing register. <p>Measures:</p> <ul style="list-style-type: none"> Number of DFGs undertaken for private rented sector homes. (<i>source: Analysis of service data</i>) 	<p>Indicative costs: None.</p> <p>Indicative timeline: Comms at Q1/2 2021/2022</p>
O1.5	<p>Consider the viability and benefits of extending Repayable Home Repair Loan into the private rented sector <i>Lead Area: Home Improvement Team</i></p> <p>Considerations:</p> <ul style="list-style-type: none"> Potential need a review of eligibility Promotion of the scheme through agreed routes. 	<p>Benefits:</p> <ul style="list-style-type: none"> Safer homes and improved standards of living <p>Measures:</p> <p>TBC</p>	<p>Indicative costs: None.</p> <p>Indicative timeline: Q1/2 2021/2022</p>
O1.6	<p>Range of Planning-related Activities <i>Lead Area: Planning</i></p> <p>Concentrations of HMOs can lead to local issues of amenity and community impact. Small (3-6 persons) HMOs do not require planning permission unless located in areas subject to Article 4 Directions. Current Article 4 Direction were adopted in 2014.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> Managed spread of HMOs in areas of concentration Improved amenity conditions in A4D areas <p>Measures:</p>	<p>Indicative costs: None.</p> <p>Indicative timeline: Publish A4D summer 2021 Confirm summer 2022</p>

	<p>In order to address this, a review of existing and the potential introduction of new Article 4 Directions to control concentrations of HMOs has been commenced, which will follow the steps below:</p> <ul style="list-style-type: none"> • Consultation with Members, • Publication and Consultation on Draft Non-Immediate Direction, • Subsequent confirmation upon expiry of 12-month notification period <p>The Review will use the BRE modelled data as well as existing datasets.</p> <hr/> <p>In addition to the above, the City's new Local Plan will review and update a wide range of policies affecting residential development including the private rented sector. The following policy areas are relevant:</p> <ul style="list-style-type: none"> • Adopt new planning Policy to manage concentration of HMOs better through a more dispersed pattern of distribution. • Space standards - Adopt Policy to require NDSS • Strengthen Local Plan Housing policy to improve conditions and reduce impacts within PRS • Adopt new housing mix policies, affordable housing policies including new s106 Policies, spatial strategy policy – • Ongoing pursuit of unauthorised developments and breaches of planning control to safeguard residential amenity and improve quality of stock • Ongoing application of development management policies to improve design and quality of development where we have planning control 	<ul style="list-style-type: none"> • Numbers of planning applications for conversion to HMOs received in A4D areas • % of appeals dismissed in A4D areas <p>Benefits:</p> <ul style="list-style-type: none"> • Housing delivery • Increased council tax and New Homes Bonus • Improved affordability • Improved design and amenity conditions <p>Measures:</p> <ul style="list-style-type: none"> • Ongoing reporting of delivery to CLG • Annual Housing Delivery test outcome • Affordable Housing S106 delivery 	<hr/> <p>Indicative timeline: Publish consultation material - winter 2021, Confirm- summer 2022, Plan adoption - 2022/23.</p>
Would require additional resource:			
O1.7 & O1.8	<p>Operations Mandarin & EPC <i>Lead Area: Community Safety & Protection</i></p> <p><i>Operation Mandarin</i></p> <p>Operation Mandarin is initially a task and finish exercise which has the aim of identifying unlicensed HMOs and then, by working with landlords, ensuring that licenses are explored and taken up. That said there will also be an on-going commitment to continue to analyse data and respond to intelligence about unlicensed HMOs after the operation is complete.</p> <p>This is currently resourced using existing resources within Community Safety establishment (EH Support Officer).</p> <p><u>Stage 1:</u> Project development using the BRE Conditions Report October-November 2020. Please note an Enforcement Officer was planned and recruited (is in post) to deliver this work and is funded by the mandatory licensing scheme.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Dedicated officer will allow focus on operations. • Better internal and external links are established and maintained. • Ensure that cross-service issues are identified and dealt with via partnership input. • better housing standards • safer homes • increased mandatory HMO licensing • improved energy efficiency • contribution to the council's Climate Emergency Response <p>Measures:</p> <ul style="list-style-type: none"> • Increased numbers of licensed HMOs (<i>source: Analysis of service data</i>) 	<p>Indicative costs: Costs relating to this initiative will involve the recruitment of a Senior Environmental Health Officer (SEHO), whose role will be to co-ordinate Operations such as Operation EPC, Operation Mandarin, and the Compliant Landlord Taskforce.</p> <p>Operation Mandarin is currently underway but the SEHO would be required in order ensure meaningful continuation rather than task and finish. The role will also then allow for undertaking Operation EPC, identifying and operating new operations, as well as supporting various elements of the Team Manager's work.</p>

	<p><u>Stage 2:</u> In December 2020 printed postcards were sent to the occupiers of the identified properties and letters sent addressed to the 'legal owners' of those properties.</p> <p><u>(Current) Stage 3:</u> Based on responses received to the postcards and letters more targeted action is being undertaken in streets where there are already licensed properties (indicating the size and layout of property, allows for 5+ tenants) and local intelligence indicates the likelihood of licensable HMOs.</p> <p><u>Stage 4:</u> Enforcement Action: - If properties are found to be unlicensed, despite landlords/ owners being advised of licensing requirements, enforcement action can be taken. The enforcement options available are prosecution or issuing a Civil Penalty.</p> <p><i>Operation EPC - pro-actively ensure that properties are meeting the energy efficiency standards</i></p> <p>An Energy Performance Certificate (EPC) is issued when a property has been inspected and assessed for energy efficiency. Properties are given a rating from A (the most efficient) to G (the most inefficient). Current changes in legislation now requires that all new tenancies require an EPC of E or better from July 2020 and all tenancies from April 2021. It is our intension to rollout Operation EPC which will target the lowest rated (F and G) properties. Landlords will be required to make necessary energy efficiency improvements (or obtain an exemption). Where landlords fail to make the required changes, enforcement action will be taken.</p> <p>Data provided by BRE suggests there are approximately 1200 properties with an EPC of G and F in the Private Rented Sector. Enforcement of legislation that requires landlords to provide tenants with an EPC for the property is usually done by Trading Standards as it falls under their consumer protection function.</p> <p>A property in the PRS with an EPC of F or G is almost certainly going to score highly for Excess Cold in an HHSRS assessment and PSH would therefore take action with the landlord to reduce the hazard. As a matter of course, officers check the EPC register when dealing with a property brought to our attention, so some will be picked up as part of our routine work.</p>	<ul style="list-style-type: none"> Reduction in repeat complaints regarding rogue landlords across the Council (source: Analysis of service data) 	<p>The annual cost of £53k can be absorbed within existing staffing budgets.</p> <p>Indicative timeline: Mandarin – Ongoing, EPC - Ongoing</p>
O1.9	<p>Implementation of a Licensing Scheme <i>Lead Area: Community Safety & Protection</i></p> <p>There should be a substantial programme of Landlord engagement in considering this option generally, but also to avoid reduced engagement from the sector. At this time Landlords within the Private rented sector are particularly feeling fiscal pressure as an impact of COVID-19 which has prevented many tenants from meeting rent payments the Closure of the Courts preventing Landlords from taking timely action to remedy this.</p> <p>The adoption of a Licensing Scheme has been considered in-line with the Council's Manifesto commitment. Its purpose is to enable the Council to impose alternative licensing conditions and implement an intervention programme that targets existing or emerging problems associated with concentrations of privately rented accommodation.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> Improving housing standards across the sector Improving support available for private sector landlords Improving support available for private sector tenants Improving protection of tenants' and residents' rights Ensuring that cross-service issues are identified and dealt with via partnership input. 	<p>Indicative costs: Costs relating to this initiative will be highly dependent on options identified and agreed in relation to an additional and/ or selective licensing scheme for the city. As such a detailed report with costing will be produced as part of the scoping and option identification stage.</p> <p>Indicative timeline: Intended go-live, November 2022</p>

	<p>Licensing forms an important strand of the work planned, and in conjunction with a number of building blocks that are being put in place, can make a real difference to improving standards within the private rented sector.</p>	<ul style="list-style-type: none"> • health, safety and welfare of the community are protected • landlords maintain their property and correct any deficiencies that may exist • reduce anti-social behaviour • prevent neighbourhood blight and conditions that can result from lack of care • ensure that minimum housing standards are met • educate landlords and tenants of acceptable private rented standards <p>Measures:</p> <p>TBC</p>	<p>Next Step: Public consultation on the different licensing options.</p>
<p>OBJECTIVE 2: Improving support available for private sector landlords</p>			
<p>Could be accommodated within existing resources:</p>			
<p>O2.1 & O2.2</p>	<p>Centralised online guide to grants / incentives for landlords & other online resources <i>Lead Area: Joint (Community Safety & Protection / Homelessness Prevention & Support)</i></p> <p>Development work is taking place to offer tenants and landlords enhanced web-based information. Landlord information will cover a number of aspects such as:</p> <ul style="list-style-type: none"> • Useful tools (e.g. link to on-line licence application form, grant information) • Reference and/or educational information about legal obligations (e.g. EPC, Right to Rent, deposit schemes, fire safety, legal eviction process) • Key messages that LCC want the local community to be aware of (e.g. landlord accreditation, licensing). <p>There are a number of funding opportunities including information on energy efficiency grants, available to landlords to make improvement to their properties. These need to be shared and 'advertised' to landlords either through known links such as the Leicester Landlord Forum and included on the City Council website</p> <p>This project requires to be completed as part of the development 'private rented sector' web pages with the input of staff with expertise in this area.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Better educated landlords, armed and able to deliver better, safer service • Improved housing standards • Improved energy efficiency • Contribution to the Council's Climate Emergency Response • Safer homes <p>Measures:</p> <ul style="list-style-type: none"> • Website "hits" and other analytics • Reduction in repeat complaints regarding rogue landlords across the Council • TBC 	<p>Indicative costs: None.</p> <p>Indicative timeline: Q2/3 2021/2022</p> <p>Next step: Content draft.</p>
<p>O2.3</p>	<p>Leicester Landlord Forum <i>Lead Area: Homelessness Prevention & Support</i></p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Landlord engagement • Access to honest feedback • Access to sector leaders to networking and education 	<p>Indicative costs: No additional direct cost. Senior EH Officer would be used to support Community Safety contribution.</p>

	<p>Leicester's private landlord forum gives landlords the opportunity to meet, learn more about legislative changes, and better engage with LCC. It also allows LCC and key partners (e.g. DWP, Police) to convey key messages and maintain a link with local landlords for informal and formal consultation purposes. Historically forums have had low uptake, and varying feedback.</p> <p>The next forum will be badged as a 'relaunch' with the following key differences, based on feedback received previously:</p> <ul style="list-style-type: none"> • Landlords will be consulted on the agenda and items of very low interest will be removed • Dedicated time will be included on the agenda after each item to allow generous time for questions and answers. • A dedicated agenda item will be added for LCC to field landlord-submitted questions 		<p>Indicative timeline: Q1/2 2021/2022</p> <p>Next step: Set date and complete comms for submission of questions and feedback on proposed agenda.</p>
O2.4	<p>Call Before You Serve</p> <p><i>Lead Area: Homelessness Prevention & Support</i></p> <p>'Call Before You Serve' encourages landlords, who are experiencing issues with their tenancies / tenants to contact services as early as possible, before they serve the legal notice to end the tenancy. The officer then investigates what measures can be introduced to re-stabilize that tenancy and prevent the notice from being served or in some cases to rescind the notice.</p> <p>Homelessness Prevention & Support already do significant homelessness prevention work, but the key differences with a 'Call Before You Serve' model are:</p> <ol style="list-style-type: none"> 1. Shifting from a total reliance on tenants alerting us to threats of homelessness, some of whom present to the service extremely late when problems have become unnecessarily large, and are more difficult/costly to resolve. In section 3 it was stated how important timely notification is to the action we can take to prevent homelessness. Landlords are more likely to seek timely assistance if they know it is available, due to a desire to minimise lost income. 2. Sustained marketing and comms to ensure point 1 is maximised. <p>As such, 'Call Before You Serve' models can provide more-upstream intervention by resolving problems between tenant and landlord without needing to end the tenancy thus increasing prevention of homelessness and further avoiding the costs associated with case management and temporary accommodation. In addition to this, a tenancy saved is one less to procure moving forward, meaning that the limited housing solutions available to homelessness services can be re-directed to others in need.</p> <p>'Call Before You Serve' models have a proven track record in areas such as Derbyshire, where it is operated by DASH under the banner 'Call B4 You Serve' or CB4YS. The service provides local housing authorities with the opportunity of preventing homelessness in advance of the statutory 56-day 'prevention-duty' time period.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Improved homelessness prevention rates <ul style="list-style-type: none"> ○ Cost avoidance on interim accommodation and bed & breakfast. ○ Avoid the social, economic and health impacts of losing your home or becoming homeless. ○ Improved positive outcomes on H-CLIC Statutory return, and the reputational benefits of that • Increased networking among landlords with property portfolios ready made to work with tenants on housing benefit, therefore increasing PRS supply • Strengthening the PRS offer in relation to positive tenancy sustainment outcomes will help to relieve the pressures on the Housing Register. <p>Measures:</p> <ul style="list-style-type: none"> • Rates of successful prevention of homelessness for cases originating within the private sector (increase) (source: Analysis of HCLIC case-level data). • Rates of homelessness for cases originating within the private sector (decrease) 	<p>Indicative costs: Costs covered by re-purposing of the Homelessness Prevention Grant</p> <p>Indicative timeline: Q1 2022/2023</p> <p>Next step: Organisational changes to repurpose resources, including recruitment to additional posts.</p>

<p>There would be two ways for LCC to introduce this model:</p> <ol style="list-style-type: none"> 1. Link into the DASH scheme 2. Design and implement our own scheme <p>Cost estimates are based on the first option.</p>	<p>(source: Analysis of HCLIC case-level data).</p> <ul style="list-style-type: none"> • Rates of temporary accommodation usage for cases originating within the private sector (decrease) (source: Analysis of HCLIC case-level data). 	
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OBJECTIVE 3: Improving support available for private sector tenants

Could be accommodated within existing resources:

<p>O3.1</p>	<p>Online tenant resources <i>Lead Area: Joint (Community Safety & Protection / Homelessness Prevention & Support)</i></p> <p>Development work is taking place to offer tenants and landlords enhanced web-based information. Tenant information will cover a number of aspects such as:</p> <ul style="list-style-type: none"> • Useful tools (e.g. template letters for reporting disrepair) • Signposting/routing into key services (e.g. link to MyHOME for housing advice / homelessness assistance) • Educational material (e.g. preventing damp and mould, advice on vermin, preventing infestation) • Key messages that LCC want the local renting community to be aware of. 	<p>Benefits:</p> <ul style="list-style-type: none"> • Empowered tenants leading to; <ul style="list-style-type: none"> ○ better housing standards ○ safer homes <p>Measures:</p> <ul style="list-style-type: none"> • Website “hits” and other analytics • Reduction in repeat complaints regarding rogue landlords across the Council <p>TBC</p>	<p>Indicative costs: None</p> <p>Indicative timeline: Q2/3 2021/2022</p> <p>Next step: Content draft.</p>																		
<p>O3.2</p>	<p>Specialist Housing Advice and Homelessness Support team <i>Lead Area: Homelessness Prevention & Support</i></p> <p>This proposal recommends a re-structure of the current ‘Housing Options’ team within the homelessness, prevention & support service in order to create a specialised private rented sector housing advice & homelessness prevention team. This would be achieved by both the realignment of existing resources from the generic homelessness prevention team, and a growth bid in order to deliver new objectives and achieve meaningful output.</p> <p>This team would also be responsible for the casework element of O2.4 (Call Before You Serve) and would be the team responsible for the additional legal support and advocacy described within O4.2.</p> <p>Why is this needed?</p> <ul style="list-style-type: none"> • To respond to demand - Private rented evictions constituted 24% of all threats of homelessness in Leicester in 2019/2020 and along with family exclusions is a chief driver of homelessness within the city. • To do more – both in quantity, and in offering improved service. 	<p>Benefits:</p> <ul style="list-style-type: none"> • Improved homelessness prevention rates <ul style="list-style-type: none"> ○ Cost avoidance on interim accommodation and bed & breakfast. ○ Avoid the social, economic and health impacts of losing your home or becoming homeless. ○ Improved positive outcomes on H-CLIC Statutory return, and the reputational benefits of that • Increased networking among landlords with property portfolios ready made to work with tenants on housing benefit, therefore increasing PRS supply • Better landlord compliance with regard to the Protection from Eviction Act 1977, resulting in more quiet enjoyment of property and lowered unlawful eviction rates. 	<p>Indicative costs: Costs covered by re-purposing of the Homelessness Prevention Grant</p> <table border="1" data-bbox="1713 925 2188 1173"> <thead> <tr> <th>Set-up</th> <th>One-off</th> </tr> </thead> <tbody> <tr> <td>CBYS Toolkit</td> <td>£2,500</td> </tr> <tr> <td>CBYS DASH consultancy</td> <td>£2,000</td> </tr> <tr> <td>CBYS DASH implementation support (for the rec. 6 months)</td> <td>£10,000</td> </tr> <tr> <td>Total</td> <td>£14,500</td> </tr> </tbody> </table> <table border="1" data-bbox="1713 1197 2188 1449"> <thead> <tr> <th>Staffing</th> <th>Annual</th> </tr> </thead> <tbody> <tr> <td>Private Sector Coordinator / Team Leader</td> <td>£53,000</td> </tr> <tr> <td>Service re-alignment – 5x Hless Prevention Officers</td> <td>£0</td> </tr> <tr> <td>Additional officer to manage uplifted contact</td> <td>£47,500</td> </tr> </tbody> </table>	Set-up	One-off	CBYS Toolkit	£2,500	CBYS DASH consultancy	£2,000	CBYS DASH implementation support (for the rec. 6 months)	£10,000	Total	£14,500	Staffing	Annual	Private Sector Coordinator / Team Leader	£53,000	Service re-alignment – 5x Hless Prevention Officers	£0	Additional officer to manage uplifted contact	£47,500
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<p>A specialist team model can support a more standardised and efficient approach, holding a greater caseload of similar matters.</p> <p>Once the specialist team is created, a short programme of refresher training and process reviews will be undertaken with an understanding that the team will 'step-up' it's work with regard to;</p> <ul style="list-style-type: none"> ▪ Creative prevention of homelessness within the sector, aided by the introduction of 'Call Before You Serve', and a package of financial and non-financial tools ▪ Stronger interventions in cases of breaches of the right to quiet enjoyment of the dwelling, and/or landlord harassment / illegal eviction⁵, including assistance with defence forms, and representation in Court. <i>Note: This proposal would also include a recommendation for interviews under caution to be conducted by the specialist team, as opposed to remaining with the Corporate Fraud team.</i> <ul style="list-style-type: none"> • To do it better – specialism is not always better than generalism within teams, but in this case a specialist team would have a number of advantages due to the complex nature of the legal mechanisms, and the need to carefully coordinate tools available to ensure best use of financial assistance, for example. • To prepare for the future - Potential changes are planned to legislation in order to repeal section 21⁶ and remove the right of landlords to seek possession of Assured Shorthold Tenancies via 'no fault evictions'. These changes are widely considered to be likely to be adopted, and if so, will change the sector significantly, and change the way local authorities have to work to prevent homelessness. <p>As it stands, we are aware that many landlords will serve section 21 notices for ease, even where fault exists. This means that repealing of section 21 is likely to lead to a large rise in landlords using section 8⁷ to evict tenants. This, in turn, will enable a defence to be presented – something that local authority housing teams can assist with if enabled.</p> <p>Having a specialist team will ensure that LCC has the infrastructure, resources, and skills required to be more effective in navigating the Court system.</p>	<ul style="list-style-type: none"> • Strengthening the PRS offer in relation to positive tenancy sustainment outcomes will help to relieve the pressures on the Housing Register. • Prepares the service with an expert staff-base for future legal developments in the sector (which are likely to involve a move to move Section 8 notice - more complex evictions with proven grounds, and court process). <p>Measures:</p> <ul style="list-style-type: none"> • Rates of successful prevention of homelessness for cases originating within the private sector (increase) (source: Analysis of HCLIC case-level data). • Rates of homelessness for cases originating within the private sector (decrease) (source: Analysis of HCLIC case-level data). • Rates of temporary accommodation usage for cases originating within the private sector (decrease) (source: Analysis of HCLIC case-level data). 	<table border="1"> <tr> <td>resulting from CBYS and additional casework hours resulting from enhanced casework</td> <td></td> </tr> <tr> <td>2 additional support officers (Band 4) to manage uplifted contact resulting from CBYS</td> <td>£59,500</td> </tr> <tr> <td>Interventions</td> <td>Against DHP Fund</td> </tr> <tr> <td>Total</td> <td>£160,000</td> </tr> </table> <p>Indicative timeline: Q1 2022/2023</p> <p>Next step: Organisational changes to repurpose resources, including recruitment to additional posts.</p>	resulting from CBYS and additional casework hours resulting from enhanced casework		2 additional support officers (Band 4) to manage uplifted contact resulting from CBYS	£59,500	Interventions	Against DHP Fund	Total	£160,000
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⁵ Protection from Eviction Act 1977

⁶ Housing Act 1988, section 21(1) and (4) as amended by section 194 and paragraph 103 of Schedule 11 to the Local Government and Housing Act 1989 and section 98(2) and (3) of the Housing Act 1996

⁷ Housing Act 1988 section 8 as amended by section 151 of the Housing Act 1996, section 97 of the Anti-social Behaviour, Crime and Policing Act 2014, and section 41 of the Immigration Act 2016 and modified by section 81 of, and paragraph 6 of Schedule 29 to, the Coronavirus Act 2020.

O3.3	<p>Extension of commissioned floating support for PRS tenants <i>Lead Area: Homelessness Prevention & Support</i></p> <p>The Housing Division commissions a 3rd sector organisation to provide floating support to those who meet the referral criteria and are not living in a social tenancy.</p> <p>Increasing the level of provision, and tethering this uplifted support to the specialist team described at O3.2 could provide significant benefits, using the hours for specific targeted intervention rather than generalised support, and would be a cost effective way to replace the need to create a Tenancy Relations Support Officer role within Housing Options.</p> <p>This initiative could be done in isolation, and see benefits, but it is understood that benefits will be greater if implemented along-side, and appended to, the specialist team referenced at O3.2.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Having ring-fenced capacity for referrals from the specialist team would further enhance work undertaken in this area in a very cost-effective way. • Better tenancy sustainment rates <p>Measures:</p> <p>See O3.2.</p>	<p>Indicative costs: A contract variation to extend the support offered by 10% capacity. Costs covered by re-purposing of the Homelessness Prevention Grant</p> <table border="1" data-bbox="1720 292 2170 432"> <thead> <tr> <th></th> <th>Annual</th> </tr> </thead> <tbody> <tr> <td>Extend existing support by 10% capacity</td> <td>£20,000</td> </tr> <tr> <td>Total</td> <td>£20,000</td> </tr> </tbody> </table> <p>Indicative timeline: Q2 2022/2023</p> <p>Next Step: Contract variation and supplier planning.</p>		Annual	Extend existing support by 10% capacity	£20,000	Total	£20,000
	Annual								
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Total	£20,000								

OBJECTIVE 4: Improving protection of tenants' rights

Could be accommodated within existing resources:

O4.1	<p>Compliance Landlord Taskforce <i>Lead Area: Community Safety & Protection</i></p> <p>In response to increasing concerns about landlords with significant property portfolios letting poor quality housing, a Compliance Landlord Taskforce has been established. This work is based on the approach currently undertaken in relation to St Clements Court where all aspects in relation to the property(ies) will be considered e.g. adherences to Private Sector Housing standards, planning, fly tipping, Anti-Social Behaviour, criminality etc.</p> <p>The Taskforce, which is due to meet every 8 weeks, beginning Mid-February 2021 will draw officers from across the local authority (Building Control, Planning, Council Tax, Housing Options, Private Sector Housing) and from outside agencies such as Leicestershire Fire and Rescue, Police. Furthermore, on a need's basis, officers from organisations such as GLAA, Home Office/Border Control, HMRC, Modern Day Slavery will be invited to the meetings. The meetings will be a forum for the above agencies to meet and discuss and contribute to a joined-up intelligence-based approach to target particular landlords/ agencies. This multi-agency/corporate approach has been found to be effective previously for example as indicated with reference to St Clements Court but also in tackling abandoned buildings such as the former International Hotel and people with street lifestyles.</p> <p>This work is conducted as business as usual and will not require additional resources.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Contributes to a joined-up intelligence-based approach to target particular landlords/ agencies • More enforcement leading to; <ul style="list-style-type: none"> ○ better housing standards ○ safer homes ○ increased mandatory HMO licensing • Proven effectiveness <p>Measures:</p> <ul style="list-style-type: none"> • Reduction in repeat complaints regarding specific rogue landlords in the city. • Increase in enforcement action against specific known landlords 	<p>Indicative costs: None.</p> <p>Indicative timeline: N/A - Ongoing</p>
O4.2	<p>Improved legal support and advocacy (for tenant's rights, protection from eviction, landlord harassment, and breach of quiet enjoyment)</p>	<p>See O3.2.</p>	<p>See O3.2.</p>

	<p>Lead Area: <i>Homelessness Prevention & Support</i></p> <p>Objective delivered as part of O3.2.</p>		
OBJECTIVE 5: Improving access to market in order to resolve housing need			
Can be accommodated within existing resources:			
O5.1	<p>Improved Schemes, inc. HomeCome Lead Area: <i>Homelessness Prevention & Support</i></p> <p>Over the past 2 years a number of approaches have been piloted and tested, resulting in a recent piece of work to bring the best parts together and formalise them into a new coherent Landlord Incentive Scheme offer.</p> <p>The new offer consists of a single umbrella scheme, with Platinum, Gold, Silver, and Bronze options, aimed to suite the varying needs and wishes of landlords. The schemes are attractive and highly flexible.</p> <p>A final draft of scheme content, and a comms / marketing plan, was presented to Lead Member on 1st March 2021.</p> <p>Future Step: Following evaluation of the successes of the new improved incentive scheme, there will be a longer-term objective to explore stepping up the scheme model into something closer to a social lettings agency (SLA). SLAs are not-for-profit lettings agents that support low-income or vulnerable tenants in the private rented sector (PRS). The key features of an SLA are that typically it does not itself own the properties it lets, it works with low-income or vulnerable people and it provides those people with more support than might otherwise be available to them commercially. In addition, an SLA should be largely financially self-sufficient without dependence on ongoing grant funding.</p> <p>In many ways, the way Housing Options operates its landlord incentive schemes could be considered a proto-SLA, but there are a number of ways that this could be formalised and enhanced.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Increase access to the private sector for housing solutions, leading to: <ul style="list-style-type: none"> ○ cost avoidance on interim accommodation and bed & breakfast. ○ Reduced pressure on the housing register <p>Measures:</p> <ul style="list-style-type: none"> • Number of tenancies created through leasing or incentive schemes (increase) <i>(source: Analysis of service data)</i> • Rates of temporary accommodation usage for cases originating within the private sector (decrease) <i>(source: Analysis of HCLIC case-level data).</i> 	<p>Indicative costs: None.</p> <p>Indicative timeline: Q2 2021/2022</p> <p>Next Step: Continued marketing following the successful launch Event which took place on July 2nd 2021.</p>
Would require additional resource:			
O5.2	<p>Explore the viability and potential benefits of extending the Leasing Schemes to include 1-bedroom accommodation Lead Area: <i>Housing Transformation</i></p> <p>LCC's part-owned partner-company HomeCome Ltd. offer a leasing solution within the private sector landlords, and are used in tandem with the other scheme-levels dependent on the landlord's requirements.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Pathway fluidity, quicker move-on times • Better rate of vacancies as a result of above • Lowered rate of nightly accommodation use as a result of above • Cost avoidance on TA, esp. non-budgeted as a result of above 	<p>Indicative costs: Costs are highly dependent on whether an agreement with HomeCome is struck or whether we undertake this in-house, and if an agreement is struck it is dependent on inclusion of the 27% uplift in contributions to LCC in order to net off costs.</p> <p>Work is underway to determine the above, and a separate report will be</p>

<p>HomeCome do not currently take on leases for 1-bedroom, or shared accommodation. This leaves a gap. We are often approached by landlords who are keen to explore this, but often results in generalised signposting to the voluntary sector.</p> <p>Moving forward, in light of the demand on temporary accommodation and the single homeless move-on pathway, it will be important for us to increase the supply of the low-cost PRS alternative. Such an approach would give much needed fluidity to the single homeless pathway, and allow for better use of commissioned stock, and reduction in the use of expensive bed & breakfast or other nightly-paid accommodation.</p> <p><u>Note:</u> This scheme would be a highly complex consideration, with several risks and dependencies. Lessons should be collated from the LeicesterLease project to factor into any decisions made. If taken forward, such a scheme would need a housing-division-wide commitment as there are dependencies and impacts on a number of areas such as Housing Management, STAR, Repairs and Maintenance, Property Lettings, and Voids. A detailed piece of work would be required to determine viability and cost-benefit. Some risks could be mitigated by persuading HomeCome to extend their scope, rather than having a second scheme running in tandem.</p> <p><u>Assumptions made in order to arrive at indicative costings:</u></p> <ul style="list-style-type: none"> • Cost based a stock of 250 properties, based on an assumption that we would build toward this at a rate of 50 properties per year, over 5 years. • Cost would begin to level out at the 5-year mark due to lease-length and turnover. • 27% uplift in maintenance costs compared to family model to account for cohort (primarily singles with low to medium support need but complex housing backgrounds). • Potential poor property condition at the start of the lease agreement with non-standard fixtures and fittings needing replacement/repair during the period of the lease. • Further 3% uplift due to private rented sector responsibility to carry out an Electrical Installation Condition Report (EICR) every 5 years • 50% uplift in management costs compared to family model to account for additional support required by cohort. 	<ul style="list-style-type: none"> • Reduced pressure on Housing Register <p>Measures:</p> <ul style="list-style-type: none"> • Rates of temporary accommodation usage (source: Analysis of HCLIC case-level data) • Cost of temporary accommodation usage falling outside of budgeted lines (source: Analysis of financial data) • Average time accommodated within commissioned accommodation (source: Analysis of 'bed board' data) 	<p>submitted to provide a full cost-benefit analysis before a decision is sought on taking forward this workstream.</p> <p>Indicative timeline: TBC</p> <p>Next Step: Divisional cost-benefit analysis to inform a recommendation for decision report, and exploration into whether Next Steps Accommodation Programme grant funding could be used to cover the cost.</p>
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OBJECTIVE 6: Joined-up services, intelligence & monitoring

Could be accommodated within existing resources:

<p>O6.1</p>	<p>Co-location of private sector teams <i>Lead Area: Joint (Community Safety & Protection / Homelessness Prevention & Support)</i></p> <p>Co-location of teams with different responsibilities, but overlapping objectives. A good example of this is Private Rented Sector Officers (Housing) and Environmental Health Officers where although the roles are very different, referral processes are in place, and similar work is undertaken in some instances (i.e. HHSRS).</p> <p>Dependency on corporate policy on office-working (New Ways of Working) post-COVID-19.</p>	<p>Benefits:</p> <ul style="list-style-type: none"> • Improved working relationships • Better understanding • Improved processes 	<p>Indicative costs: None.</p> <p>Indicative timeline: Q1 2022/2023</p> <p>Next Step: Build co-location into COVID-19 recovery plans such that co-location is an active consideration if and when teams return to office-based environments.</p>
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Would require additional resource:

O6.2

Improvements around intelligence collection, sharing

Lead Area: Housing Systems Development / Application Support (IT) / Planning (GIS)

Work is currently underway to scope out different elements of this workstream particularly in terms of what is needed by each business area, the information held, and how that information is held (which is key in whether it can be identified and drawn out easily by automated reporting mechanisms).

Housing Systems Development are currently leading this work, with the objective of presenting a series of options for consideration (e.g. joint commissioning of IT, a CDI 'golden record, UPRN Gazetteer Record, SharePoint documents).

The purposes are two-fold, in order to assist with evidence-based decisions on strategic and planning objectives, and in order to assist with operational (day-to-day, case-by-case) functioning of services. Data therefore will pertain to property and people.

The Council's GIS and Open Data web sites including data sets such as the Local Land and Property Gazetteer and Council/Business rates will provide vehicles reference, and share relevant data and information relating to many of the strands of this Strategy. Of particular importance will be the ability to map and align different data sets to improve evidence-based decision making and improve efficiency of intelligence management.

One key element of this may be obtaining a regular housing stock condition / sector intel report. A housing stock condition report for the City has been produced by the BRE which identified there are 142,379 dwellings in Leicester, 43% are owner occupied, 35% private rented and 22% social rented. The report is very helpful in terms of informing an intelligence led approach to stock improvement in the private rented sector and is being utilised to inform programmes of work such as the compliance landlord taskforce described at O4.1. Compliance is the overall objective leading to improved standards.

There is no urgent need to commission new data as the current report is active. As such, before this work was undertaken, consideration around the following points would be good use of time:

- Full appraisal of data received to inform cost-benefit analysis;
- Ability to produce similar data in-house;
- How we think the data can be further used within the authority to improve cost-benefit profile;
- Future needs, and frequency.

Benefits:

- Improved processes
- Joined up intelligence on tenants and landlords, to flag risks or patterns between services rather than holding information in silo
- Better, more pro-active decisions
- Improvements to evidenced based decision making

Indicative costs: Work is underway to identify the most appropriate route for undertaking this work, and whether capacity exists within current teams

Indicative timeline: TBC

Next Step: Housing Systems Development to complete business analysis and options appraisal.

In addition to the above, which is focussed on what businesses hold on a persons or property level, a piece of work should also be undertaken to determine what high-level intelligence each business area collects and how this could be supplemented.

APPENDIX 2 - HIGH LEVEL SEQUENCE BASED ON RECOMMENDED OPTION

The sequence shown below has dependencies, but outlines the ambition.

Workstream	2021/22				2022/23				2023/24				2024/25			
	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Compliance Landlord Taskforce																
Bringing Empty Homes back into use																
Operation Mandarin																
Planning to meet Housing need through the Local Plan process																
Operation EPC - energy efficiency standards																
Landlord Accreditation Scheme																
Increase the take-up of Disabled Facilities Grants (DFGs)		Comms														
Improved Schemes, inc. HomeCome		Launch														
Leicester Landlord Forum																
Centralised online guide to grants and incentives for landlords		Publish														
Online landlord resources		Publish														
Online tenant resources		Publish														
Extend leasing scheme to include 1-bed accommodation		Scoping		Report		Dependent										
Improved mechanisms for public to report matters			Publish													
Co-location of private sector teams					Implement											
Call Before You Serve					Prep & Implmnt	Continue										
Specialist Housing Advice and Homelessness Support team					Prep & Implmnt	Continue										
Improved legal support and advocacy					Prep & Implmnt	Continue										
Extension of commissioned floating support for PRS tenants						Implement	Deliver									
Range of Planning-related Activities		Consultation			Conf	Adopt										
Regular in-depth sector analysis									Refresh							
Implementation of a Licensing Scheme					Consult and implement - see below	Go live										

Range of Planning-related Activities – Further Detail

The timeline for the Article 4 Areas review is as follows:

- NPT/PDCC/Scrutiny – August 2021
- Exec decision sign-off and publication – September 2021
- Consultation – Sept-October 2021
- End of Notice period – Sept 2022

The timeline for the Local Plan is as follows:

- Revision of draft LP following Reg 18 public consultation – Jul-Sept 2021
- CM sign-off – Nov 2021
- Scrutiny of submission plan – Jan 2022
- Public consultation on submission plan – Feb-April 2022
- Submission to Gov – Nov 2022
- Examination by Planning Inspector – March 2023
- Local Plan Adopted – Sept 2023

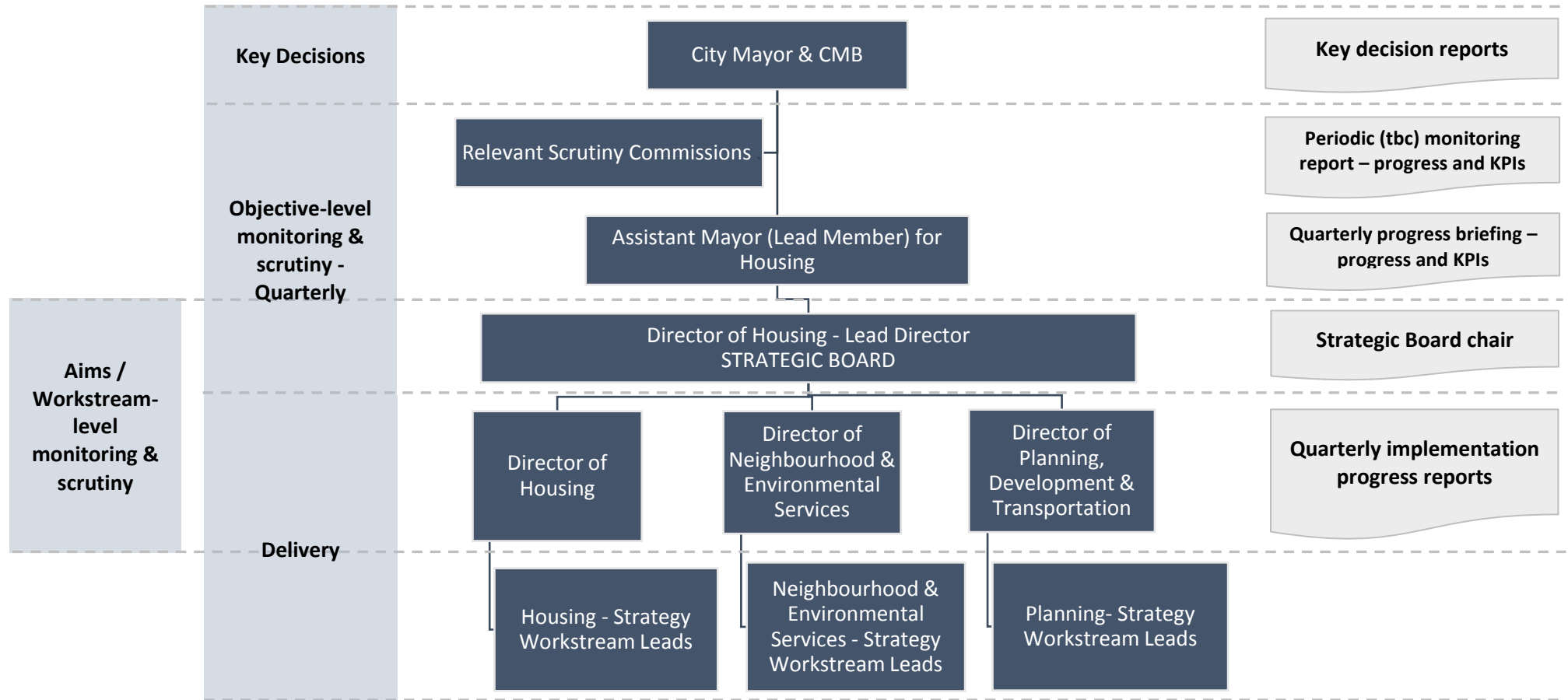
Implementation of a Licensing Scheme – Further Detail

The indicative timeline is as follows:

- City Mayor Briefing – October 2021
- Agreement of consultation questions with lead member – by November 2021
- Agreement of approaches to consultation via communications plan with lead member by November 2021.
- Overview & Scrutiny Commission – 10th November 2021
- Launch of consultation (with press/ media coverage) – November 2021
- Attendance at key meetings and forums – between November 2021 and 9th January 2022.
- Establishment of focus groups – by 30th November 2021.
- Production of an interim report with key findings – by 13th March 2022
- Production of final report – by 17th April 2022, Brief lead member – 24th April 2022
- Presentation of full findings to City Mayor and the Executive - May 2022
- Scrutiny – June 2022, CMB – June 2022, Full-council – June 2022
- Decision Notice – June 2022, Standstill – June – August 2022
- Final CM Report – August 2022
- Recruitment of Team – August 2022
- Go-live – September/ October 2022

APPENDIX 3 - HIGH-LEVEL GOVERNANCE STRUCTURE CHART

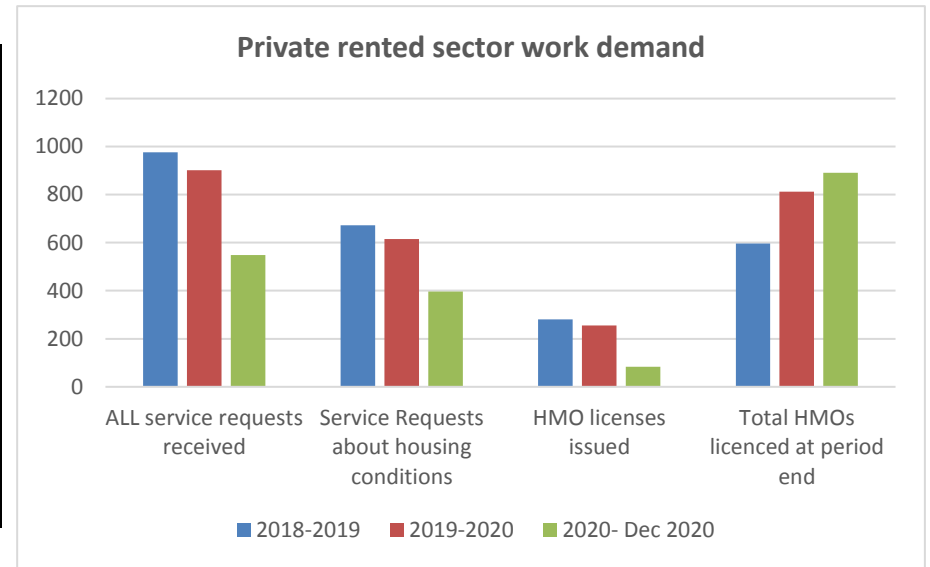
The chart below sets out the proposed governance structure.



APPENDIX 4 – Community Safety Service Information

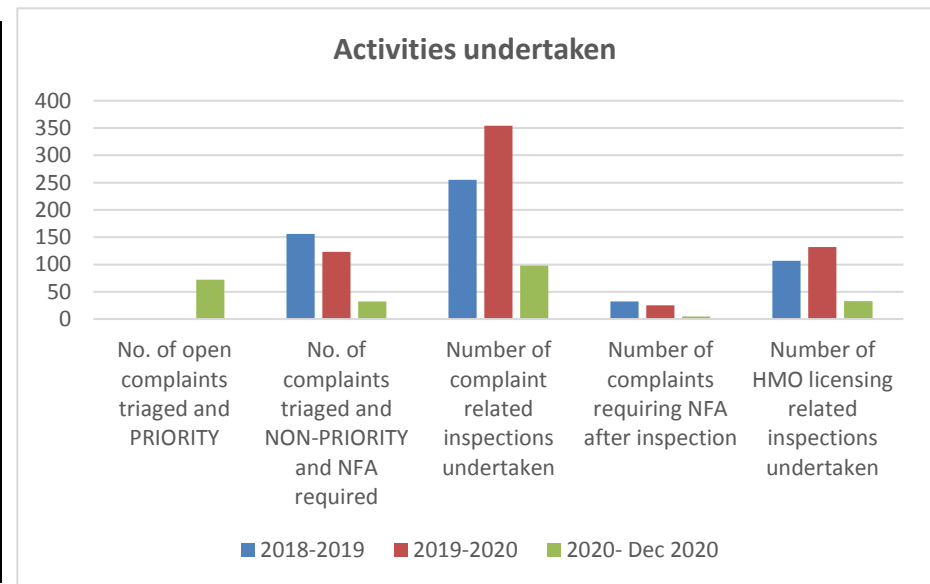
Private Rented Sector Work Demand

Financial Year	ALL service requests received	Service Requests about housing conditions	HMO licenses issued	Total HMOs licenced at period end
2018-2019	977	673	281	597
2019-2020	902	615	255	813
20/21 up to Dec2020	549	397	83	891



Activities Undertaken

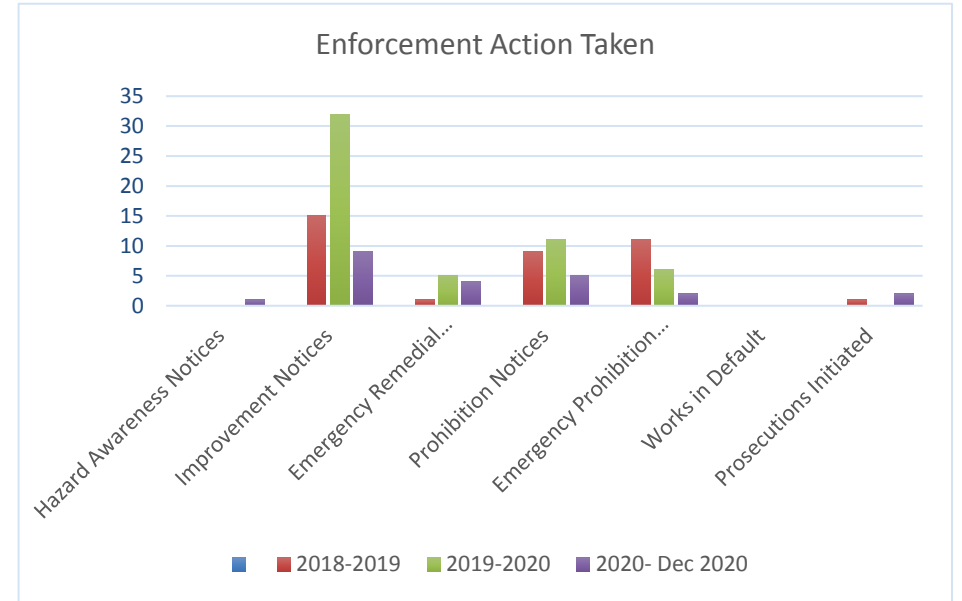
Financial Year	No. of open complaints triaged and PRIORITY	No. of complaints triaged and NON-PRIORITY and NFA required	Number of complaint related inspections undertaken	Number of complaints requiring NFA after inspection	Number of HMO licensing related inspections undertaken
2018-2019	Previous years cases c/f	156	255	32	107
2019-2020	Previous years cases c/f	123	354	25	132
20/21 up to Dec2020	72	32	98	5	33



Enforcement Actions Taken

Financial Year	Hazard Awareness Notices	Improvement Notices	Emergency Remedial Action	Prohibition Notices	Emergency Prohibition Order	Works in Default	Prosecutions Initiated
2018-2019	0	15	1	9	11	*	1
2019-2020	0	32	5	11	6	*	0
2020- Dec 2020	1	9	4	5	2	0	2

*not previously recorded on Uniform.



APPENDIX 4a – Key Findings and Monitorable Elements from BRE Report

5.1 Key findings

5.2 Number and type of dwelling within the city:

- There are 142,261 dwellings in Leicester of which 42% are owner occupied, 35% privately rented and 22% social rented.
- All Wards within Leicester have private rented housing stock in excess of the national average of 19%.
- There are an estimated 9,649 Houses in Multiple Occupation in Leicester.

5.3 Category 1 Hazards (HHSRS):

- 17% of privately rented properties (8,541 properties) have a category 1 hazard (s) (the Housing Health and Safety Rating System defines a category 1 hazard as an immediate risk to some ones health and safety and was introduced in Housing Act 2004 and applies to residential properties in England and Wales).
- HMOs have more fall hazards than other types of property

5.4 Energy efficient homes:

- 4.8% (2,378 properties) of Leicester's private rented dwellings are estimated to have an Energy Performance Certificate (EPC) rating below band E.
- The average SimpleSAP rating (energy performance) of private rented stock is a score of 60 (out of 100 and this is the same as both England and the East Midlands)
- HMOs in Leicester have lower energy ratings compared to non-HMOs (average SimpleSAP score of 58 compared to 61)

5.5 Fuel Poverty (low income high costs definition):

- The highest concentrations of fuel poverty were found in Eyres Monsell, Braunstone Park & Rowley Fields and Saffron.

5.6 Low Income Households:

- 100% of private rented dwellings in Eyres Monsell are located in the 20% most deprived Lower Super Output Areas (LSOA) in England

APPENDIX 5 – Homelessness Service Information

Private rented sector housing assistance

Demand for statutory housing assistance from tenants within the private rented sector

2018/2019

Homeless Applications from households within the PRS 759

2019/2020

Homeless Applications from households within the PRS 740

Outcomes for those presenting with a threat of homelessness

2018/2019

Prevention - sustainment	44%
Prevention - new accommodation solution	26%
Other	13%
Became homeless	18%
Total	100%

2019/2020

Prevention - sustainment	47%
Prevention - new accommodation solution	29%
Other	13%
Became homeless	11%
Total	100%

Outcomes for those presenting already homeless, or subsequent homelessness as a result of failed prevention

2018/2019

Accommodation solution from Relief Duty	50%
Accommodation solution from Main Duty	20%
Other	30%
Total	100%

2019/2020

Accommodation solution from Relief Duty	54%
Accommodation solution from Main Duty	11%
Other	35%
Total	100%

Overall Outcomes for those presenting for statutory housing assistance

2018/2019

Prevention - sustainment	35%
Prevention - new accommodation solution	21%
Accommodation solution from Relief or Main	24%
Other	20%
Total	100%

2019/2020

Prevention - sustainment	38%
Prevention - new accommodation solution	24%
Accommodation solution from Relief or Main	17%
Other	20%
Total	100%

Accommodation solutions via leasing and/or incentive schemes

Financial Year	Q1	Q2	Q3	Q4	Total
2018-2019	n/a	n/a	n/a	n/a	170
2019-2020	35	52	53	61	201
2020-2021	23*	66	49	n/a	Forecasted 200

**Performance impacted by 1st pandemic lockdown*