



HILLINGDON  
LONDON



# Residents' Services Select Committee

## Councillors on the Committee

Councillor Wayne Bridges (Chair)  
Councillor Peter Smallwood (Vice-Chair)  
Councillor Darran Davies  
Councillor Ekta Gohil  
Councillor Scott Farley (Opposition Lead)  
Councillor Janet Gardner  
Councillor Kamal Preet Kaur

**Date:** TUESDAY, 24 SEPTEMBER  
2024

**Time:** 7.00 PM

**Venue:** COMMITTEE ROOM 5 -  
CIVIC CENTRE

**Meeting  
Details:** The public and press are welcome  
to attend and observe the meeting.

For safety and accessibility, security measures will be conducted, including searches of individuals and their belongings. Attendees must also provide satisfactory proof of identity upon arrival. Refusal to comply with these requirements will result in non-admittance.

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## Terms of Reference

### Residents' Services Select Committee

To undertake the overview and scrutiny role in relation to the following Cabinet Member portfolio(s) and service areas:

Cabinet Member Portfolio	Cabinet Member for Residents' Services (Cllr Eddie Lavery)
Relevant service areas	<ol style="list-style-type: none"><li>1) Community Safety, Licensing, Standards and Enforcement</li><li>2) Planning &amp; Regeneration</li><li>3) Housing policy, homelessness &amp; tenancy management</li><li>4) Green Spaces, Sport &amp; Culture</li><li>5) Waste Services</li></ol>

#### Statutory Crime and Disorder Scrutiny

This Committee will act as a Crime and Disorder Committee as defined in the Crime and Disorder (Overview and Scrutiny) Regulations 2009 and carry out the bi-annual scrutiny of decisions made, or other action taken, in connection with the discharge by the responsible authorities of their crime and disorder functions. In practice, this is undertaken currently by a bi-annual review of the Safer Hillingdon Partnership, which includes senior officers from the Metropolitan Police, London Fire Brigade and Probation Service attending to answer questions from Councillors. More guidance on this important aspect of external scrutiny will be provided to the Committee.

#### Cross-cutting topics

This Committee will also act as lead select committee on the monitoring and review of the following cross-cutting topics:

- Climate Change
- Local impacts of Heathrow expansion
- Local impacts of High Speed 2
- Community Cohesion

# Agenda

- 1 Apologies for Absence
- 2 Declarations of interest in matters coming before this meeting
- 3 To receive the minutes of the previous meeting 1 - 12
- 4 To confirm that the items of business marked as Part I will be considered in public and those marked Part II will be considered in private

## **Part I - Members, Public and Press**

- 5 Review of Homelessness and the Customer Journey: Witness Session 5 13 - 22
- 6 Safer Hillingdon Partnership Report 23 - 36
- 7 Statement of Gambling Policy Consultation 37 - 120
- 8 Housing Allocation Policy Consultation Draft 121 - 198
- 9 Forward Plan 199 - 210
- 10 Work Programme 211 - 214

## Minutes

### RESIDENTS' SERVICES SELECT COMMITTEE

18 July 2024



HILLINGDON  
LONDON

Meeting held at Committee Room 5 - Civic Centre

	<p><b>Committee Members Present:</b> Councillors Wayne Bridges (Chair), Darran Davies, Ekta Gohil, Scott Farley (Opposition Lead), Janet Gardner, Kamal Preet Kaur and Richard Lewis</p> <p><b>Witnesses Present:</b> Sultana Ahmed – Independent Domestic Violence Adviser Sonia Stewart – Independent Domestic Violence Manager Rachel Bulley – NHS Social Prescribing Link Worker, Colne Union PCN</p> <p><b>Officers Present:</b> Melissa Blower - Housing Improvement Programme Manager Dan Kennedy - Corporate Director of Central Services Nicky McDermott - Sports Contract Manager Liz Penny - Democratic Services Officer Priscilla Simpson – Sport and Physical Activity Team Manager</p>
12.	<p><b>APOLOGIES FOR ABSENCE</b> (<i>Agenda Item 1</i>)</p> <p>Apologies for absence were received from Councillor Peter Smallwood with Councillor Richard Lewis substituting.</p>
13.	<p><b>DECLARATIONS OF INTEREST IN MATTERS COMING BEFORE THIS MEETING</b> (<i>Agenda Item 2</i>)</p> <p>There were no declarations of interest.</p>
14.	<p><b>TO RECEIVE THE MINUTES OF THE PREVIOUS MEETING DATED 13 JUNE 2024</b> (<i>Agenda Item 3</i>)</p> <p><b>RESOLVED:</b> That the minutes of the meeting dated 13 June 2024 be agreed as an accurate record.</p>
15.	<p><b>TO CONFIRM THAT THE ITEMS OF BUSINESS MARKED AS PART I WILL BE CONSIDERED IN PUBLIC AND THOSE MARKED PART II WILL BE CONSIDERED IN PRIVATE</b> (<i>Agenda Item 4</i>)</p> <p>It was confirmed that all items of business were marked as Part I and would be considered in public.</p>
16.	<p><b>REVIEW OF HOMELESSNESS AND THE CUSTOMER JOURNEY: WITNESS SESSION 4</b> (<i>Agenda Item 5</i>)</p> <p>Dan Kennedy, Corporate Director of Central Services, introduced the item. The Select Committee heard from Sonia Stewart, Independent Domestic Violence Manager, and from Sultana Ahmed, Independent Domestic Violence Adviser (IDVA).</p>

Sonia Stewart and Sultana Ahmed addressed the Select Committee providing an overview of the Hillingdon domestic advocacy service and highlighting its evolution over the past two years from focusing solely on high-risk victims of domestic abuse to now supporting victims across all levels of risk.

Members heard that the service now included a floating support side, catering to low and medium-risk victims, in addition to the high-risk interventions provided by the Independent Domestic Violence Advocates (IDVAs). The team comprised 5 IDVAs and 3 floating support workers, offering both short-term crisis intervention and long-term support.

Officers raised concerns regarding the approach to housing for victims of domestic abuse. It was noted that victims presenting to housing were often asked about police involvement (which formed part of the enquiries the Council made when a victim approached the Council for assistance), which could influence the support they received. This was concerning as not all victims may involve the police for various reasons, including threats from the perpetrator.

The Committee heard that the requirement for documentation when seeking housing support posed a significant challenge for victims fleeing emergency situations. It was recognised that in such circumstances, victims may not have the ability to gather necessary identification documents, which were crucial for accessing housing support.

The challenges faced by victims of domestic abuse when seeking housing support were highlighted. Concerns were raised about the need to ask about police involvement, which may not always be present despite the occurrence of domestic abuse.

It was highlighted that victims fleeing domestic abuse were often offered accommodation far from their support systems, which could exacerbate their vulnerability. The Committee recognised the significant impact of relocating victims away from their jobs, families, communities, and children's schools, especially when they or their children had additional complex needs.

Members were informed that inconsistencies were reported by clients when approaching housing services for assistance, particularly concerning the advice given about the possibility of remaining within the Borough. The lack of clarity in policy or criteria used to determine why some victims stayed in Borough while others were relocated outside the Borough was highlighted as a matter needing further enquiry.

It was noted that while advising clients, there was a need to manage their expectations regarding potential housing outcomes. However, the inconsistency in the application of housing policies had led to confusion and the need for correct and effective guidance. With regard to the Sanctuary Scheme, officers noted that the scheme assessed properties to implement additional security measures for victims of domestic abuse who wished to remain in their homes. There was a lack of clarity around time frames for referrals and responses. Automated messages to confirm receipt of referrals and inform clients of expected contact times would be welcomed.

In terms of staff turnover, the Committee was advised that there was a high turnover of staff within the housing team. Clients and advocates were not always informed about staff changes. The importance of consistent communication and updates for clients

was highlighted. It was noted that some housing officers left their jobs without informing clients, leading to missed communications and unresolved issues.

In respect of appointments and Housing Reception, officers raised concerns about victims being turned away if they arrived without an appointment. There was a need for clear guidance on what reception staff should advise clients. Members heard that victims arriving at housing reception without an appointment were signposted to main reception where security could provide immediate assistance and an appointment made

Officers commented that it was vital to use professional interpreters for clients who did not speak English rather than relying on family members or children.

In respect of the Housing Reception environment, it was noted that this was not a welcoming place. Victims were at times obliged to spend the whole day there but there were no amenities for them and their children such as water, toys, and magazines to meet clients' needs. Clients were scared to leave for fear of missing their chance to speak to someone.

Members were informed that the working relationship with housing officers had improved since HDAAS had relocated to the Civic Centre. Officers worked proactively with housing colleagues and were able to communicate directly with housing officers to address concerns and discuss risks. However, the importance of consistent communication with housing officers, especially during staff changes was reiterated. Timely updates on case allocations were essential. At times, officers and clients received bounced back emails and notifications about staff changes when chasing up cases which was unhelpful.

With regards to Domestic Abuse training, Members heard that training had been offered to various departments within the Council but there had been a lack of response from housing managers. The importance of understanding victims' perceptions of risk and being supportive and believing their disclosures was highlighted - victims may be discouraged from seeking help if they felt disbelieved or unsupported.

Rachel Bulley, Social Prescribing Link Worker representing Colne Union PCN, NHS, addressed the Committee. Rachel began by explaining the concept of PCNs (Primary Care Networks), which were collections of GP surgeries that worked together within a network. Colne Union PCN represented the areas of West Drayton and Uxbridge. There were many social prescribers across the Borough of Hillingdon, each associated with different PCNs. The organisation they worked for was called Confederation Hillingdon, a CIC (Community Interest Company) based around healthcare.

Social prescribing was a relatively new role within the NHS, focusing on the social elements of a person's well-being. The NHS had traditionally focused on healthcare, but now there was a comprehensive approach to consider patients' social, practical, and well-being needs. Social prescribers received referrals from GPs, reception staff, and even residents themselves. They assisted with a wide range of issues, including social isolation, housing problems, debt, finance issues, bereavement, and cancer care.

Rachel emphasised the importance of social prescribers understanding and being aware of local support and community services within Hillingdon. Integrated care was crucial, as gaps in services could lead to patients falling through the cracks and

returning to primary care. Preventative support in primary care was essential to avoid escalation to secondary care. Social prescribers worked with local authorities, medical abuse charities, and other organisations to ensure residents were aware of and could access the services they needed.

Rachel expressed her support for the points raised by Sonia and Sultana regarding domestic abuse. Although social prescribers did not necessarily deal with domestic abuse directly, many of the issues raised were relevant to their work.

Members expressed concerns about the experience of victims of domestic abuse noting that some victims did not feel believed when they presented themselves to the housing department, which could lead them to return to their perpetrators. Councillors emphasised the importance of understanding the strength it took for a victim to disclose their situation and the negative impact of dismissive attitudes from housing staff. The ongoing effects of domestic abuse, including post-traumatic stress were highlighted; it was vital that support should not end once a victim left their home.

Officers echoed Members' concerns. The lack of empathy and understanding experienced by some patients in dire situations was noted. Examples of negative feedback included unsupportive questions about overcrowding.. It was explained that social prescribers often found themselves stuck between patients and housing officers who did not connect with the humanistic side of patients. However, Rachel also mentioned that her organisation had been working with the transformation team in the housing department to bridge the gap between primary care and the local Housing Authority. Initiatives included Brightside Workshops for primary care staff, the potential creation of a new role within housing to act as a link between patients and housing, and the development of Q&A leaflets to address common patient questions. Training for housing staff to improve their understanding and handling of domestic abuse cases was of paramount importance.

Questions were invited from Members. One Councillor highlighted a concerning issue that had come to light during their visit to the housing reception / contact centre. They noted that the housing reception felt like a custody suite and questioned the process of directing individuals to the security desk. The Councillor expressed concern about the treatment of domestic abuse victims who presented at the housing reception without an appointment, questioning whether they were turned away or advised to go to the main reception to speak to security. They emphasised the need for clarity on this process and the training provided to security personnel, noting that interactions with security could be triggering for some victims.

Another Councillor enquired about integrated care within housing, particularly concerning homelessness caused by drug and alcohol abuse. They asked about the availability of detox facilities and mental health care services. Officers responded, explaining that social prescribing in Hillingdon involved referring patients to ARCH, the main service for addiction support. They acknowledged capacity issues within ARCH and highlighted the role of mental health practitioners in triaging patients and providing support in primary or secondary care. They also mentioned ongoing neighbourhood projects addressing anxiety and depression.

The Committee thanked the officers for their presentation and acknowledged the concerns raised about communication and inconsistency of approach. They enquired about staff turnover and resource availability, asking how the Council could better support the officers' work. Officers explained that their service had grown stronger with



additional staff and floating support workers. They shared statistics on high-risk referrals and emphasised the need for accessible counselling services for domestic abuse victims. They noted the challenges in finding counselling services due to long waiting lists.

The discussion continued with a focus on improving communication and coordination. Officers stressed the importance of having a single point of contact within the domestic abuse team to streamline communication and reduce the need for constant chasing. They highlighted the need for clear processes and better understanding of available schemes, such as the rent deposit scheme and local housing living allowance. Officers described the difficulties faced by patients in accessing these schemes and the vicious cycle of requirements and delays.

Councillors sought further clarity regarding the impact of housing issues on residents' mental health. Officers explained that housing crises significantly affected patients' mental health, often leading to resistance in accessing mental health services. They noted the gap between primary and secondary mental health services and the challenges in supporting patients with situational mental health issues. Officers emphasised the need for better communication and understanding of processes to support residents effectively.

Councillors and officers agreed on the importance of clear communication, accessible support services, and streamlined processes to better serve residents and address the challenges faced by those experiencing homelessness and related issues.

Councillors sought recommendations from officers regarding improvements to the service and emphasised the importance of understanding how the service could be improved.

Officers provided an update on the current progress. They mentioned that, slowly but surely, improvements were being made, particularly through collaboration with the transformation team and housing departments. Officers highlighted the involvement of key individuals, such as Fola and Reginald, in integrating services. They discussed the potential benefits of having a single point of contact to provide patient support and information. Officers emphasised the importance of a two-way relationship between housing officers and their team, where both parties supported each other. They also mentioned ongoing roadshows aimed at educating residents about housing expectations and processes. Officers stressed the need for clear communication and support for residents, avoiding confusing jargon.

Members thanked the officers for their hard work and acknowledged the importance of scrutinising the service's effectiveness. They sought further clarification regarding the experiences of counterparts in other boroughs and whether there were any best practices that could be adopted.

In response to Members' questions, it was confirmed that housing departments across different boroughs faced similar issues, particularly in supporting domestic abuse victims with empathy and without unnecessary scrutiny. They shared examples of gatekeeping and the challenges faced by victims in accessing support. Officers mentioned that colleagues from other boroughs, such as Hounslow, experienced similar issues. They highlighted the difficulties in signposting clients to other boroughs for emergency accommodation and the lack of communication and consistency in support. The Committee was advised of the challenges in accessing refuge spaces for

victims and the need for better coordination.

A representative from the public health team offered to provide data on homelessness profiles against comparator sites via other boroughs. They mentioned that the Office for Health Improvement and Disparities (OHID) held relevant data and could assist the Committee in understanding the broader context.

Councillors expressed interest in having sight of said data and emphasised the importance of understanding the current standing to effectively improve the service. They also enquired about support from other bodies, such as the Greater London Authority (GLA), and whether additional support had been requested. Officers acknowledged that they had not asked for additional support from other bodies but indicated that it might be beneficial.

The Committee enquired about the process of relocating clients out of the Borough and whether they remained with the service or were transferred to the local authority in the new area. It was confirmed that clients relocated out of the Borough were referred to the domestic abuse service in the new area. If children were involved, a transfer to the new area's children social care team would be arranged. Members heard that some clients returned to their original area due to familiarity and support networks.

Members raised concerns about the lack of communication when high-risk cases moved back to the Borough and the potential gaps in support. They also highlighted the need for an in-house counselling service for both victims and staff, given the emotional toll of their work.

In response to this, officers agreed with the need for clinical supervision and support for team members who regularly dealt with harrowing accounts of violence. They emphasised the importance of having someone independent to offload to and discuss their experiences.

Dan Kennedy, the Corporate Director of Central Services thanked the Chair and everyone for their contributions. He provided context on the current tough environment, noting that the number of housing needs approaches had increased by about 28% since 2019, with 120 to 140 approaches every week. He highlighted the compounded challenges due to rising mortgage interest rates, increasing rents, and landlords exiting the market. Mr Kennedy emphasised the support from the Cabinet, which had invested in acquiring 300 extra properties and working with housing associations to increase housing supply by an additional 300 properties this year compared to last year, rising to 500 homes over the next three years.

The Corporate Director of Central Services also mentioned that the changes made over the last year had reduced the number of placements into temporary accommodation by 10% compared to the previous year. He stressed the importance of preventing homelessness to provide stable and secure housing for families, which lead to better outcomes for children. He noted a 7% drop in the number of households living in the highest cost temporary accommodation since mid-April, with no families in commercial hotels and no families with children living in shared accommodation for more than six weeks.

Mr Kennedy acknowledged the need for consistency and mentioned efforts to strengthen staff training. He discussed the challenges of handling referrals from other boroughs and the importance of asking the right questions with empathy. He expressed

the intention to reinstate a model with dedicated officers for domestic abuse cases to build expertise and empathy. The importance of having champions for other services, such as hospital discharge, and the need for a triage function to handle cases effectively was highlighted.

The Committee was appraised of the importance of relationships with private landlords and the need to increase the supply of private rented sector accommodation. The Corporate Director recognised the pressure on staff and mentioned efforts to strengthen welfare arrangements and supervision policies. He discussed the need to improve communication with residents, including making letters more understandable and providing clear explanations from housing officers. Moreover, he addressed the appointment process for housing needs reception, noting the importance of safety for staff and the need to improve the system to provide a better customer experience. He mentioned ongoing work with the corporate management team to make further improvements.

Officers expressed concern about the low number of domestic abuse referrals from housing. They questioned whether housing officers were referring victims to domestic abuse services and children's social care in the new boroughs when victims moved out of the Borough. The need for better coordination and communication to ensure that victims received the necessary support was highlighted.

Officers and witnesses were thanked for their attendance and for their invaluable testimony which would assist in formulating recommendations for the review.

**RESOLVED: That the Residents' Services Select Committee noted the evidence heard at the witness session and sought clarification as necessary in the context of its review of Homelessness and the Customer Journey in Hillingdon**

17. **REVIEW OF HOMELESSNESS AND THE CUSTOMER JOURNEY: UPDATE FROM COUNCIL OFFICERS ON IMPROVEMENT ACTIVITY** (*Agenda Item 6*)

Dan Kennedy, Corporate Director of Central Services, provided an update on the Housing Improvement Activity Plan to date. He emphasised that the plan addressed a wide range of issues related to homelessness and the customer journey. The plan included strategies and policies, workforce planning, and the importance of having more entry-level roles to build a permanent workforce. The challenges of recruiting and retaining staff in this area and the need for a ladder of career progression within local government were highlighted. He also mentioned the importance of customer care and management supervision and providing support to staff dealing with traumatic casework.

Members were informed about the housing commissioning plan, which aimed to increase the number of properties and make the best use of existing housing stock. This included encouraging under-occupiers, both council tenants and housing association tenants, to downsize, acquiring more properties, and utilising the private rented sector. The plan set challenging but achievable targets to meet these goals.

The Select Committee heard that understanding the local housing market and its pressures was another key area of focus. It was believed that by understanding the market, the Council could predict and manage it more effectively. This included knowing which private sector landlords were evicting tenants and why and building relationships with them to prevent evictions. The importance of understanding the cost

of temporary accommodation and prioritising the commissioning of new properties to help people move on or prevent homelessness were also emphasised.

The Corporate Director stressed the need for a proactive approach, building a plan and investment strategy to create a positive pipeline of housing supply. He also highlighted the value of strong working relationships within the Council and with other services, such as Children's Services and Adult Social Care. Good working relationships could help prevent homelessness and encourage families to accept accommodation offers.

Councillors were advised that the biggest challenge was responding to emergency accommodation needs, which often required finding immediate solutions. Preventing or avoiding on-the-day presentations was critical.

Councillors noted that since the review had started, every witness session had highlighted that some staff within the housing department lacked empathy. They enquired if any action was being taken to identify and address these staff members' communication issues. Members emphasised the importance of how questions were asked and sought clarity on the plan to address this issue.

In response to this, officers acknowledged the concern, agreeing that even one or two staff members lacking empathy could impact the level of customer care. They mentioned that communications with staff about expectations had been strengthened. Managers were shadowing staff during conversations with residents, and the officers themselves were listening to calls and attending contact centre calls regularly. The need for empathy and clarity in communication, even when solutions were not readily available was highlighted. Members heard that individuals who were less helpful had been identified and the concerns addressed. Training and conversations had been conducted.

Councillors commented that it would be beneficial for the Committee to hear about tangible changes over the next few months. They suggested adding a Key Performance Indicator (KPI) to track improvements in staff empathy and communication.

Members enquired as to the percentage of properties expected to be lost due to the right to buy scheme. It was confirmed that approximately 50 properties were lost each year through right to buy, and this number fluctuated with market conditions. Members heard that the programme aimed to outpace this loss by targeting family-sized properties and properties suitable for downsizers.

Councillors raised a case where a resident had to present themselves to the Civic Centre due to the out-of-hours team lacking correct homeless prevention training. They enquired about the training being offered to the out-of-hours team. In response to this, it was confirmed that the out-of-hours officers were very experienced officers, but the particular issue raised was acknowledged. Officers mentioned that they were reviewing the out-of-hours service ensure a resilient team was in place and ensure that staff were well-trained and knowledgeable about referral processes and thresholds.

The Select Committee sought further clarification as to whether the efforts being taken to reduce the number of homeless families in high-cost temporary accommodation included asylum seekers who had become homeless after being evicted from hotels. It was confirmed that Hillingdon had a high number of asylum seekers placed by the Home Office in the Borough and that officers were lobbying for more time to find

solutions for those leaving hotels. Members were informed that single adults placed by the Home Office did not attract priority need unless they were vulnerable, but they were offered advice and support to secure their own accommodation. Officers emphasised the need for more funding to provide support for asylum seekers and mentioned that they were being proactive in managing expectations and finding solutions.

Councillors enquired whether the duration of temporary accommodation would decrease as more houses were bought. The Corporate Director acknowledged the challenge but stated that increasing the supply of private rented sector accommodation, social rented affordable housing, and stronger prevention and mediation efforts would help reduce the number of households in temporary accommodation. He emphasised the mission to reduce homelessness and move families out of temporary accommodation as quickly as possible.

In response to questions about outbound functions in workforce planning, it was explained that outbound functions involved training staff to undertake visits and engage with residents empathetically. Officers also highlighted the importance of supporting staff at all stages, providing strong supervision, and ensuring manageable caseloads to retain staff.

Members sought further clarification regarding the alleged lack of empathy among some staff members. They acknowledged that asking difficult questions was a challenging job and that some people may be more or less offended by these questions. They also noted that the process could be dehumanizing, given the repetitive exposure to terrible situations. However, Members emphasised the need for evidence-based retraining and enquired if all conversations were recorded so that managers could review them.

In response to this it was confirmed that not all conversations were recorded. Nevertheless, managers often supported staff by attending and coaching them before challenging conversations with residents. The Corporate Director mentioned that experienced housing officers were paired with less experienced ones to discuss scenarios and questions that might arise. Staff who needed extra help, due to complaints or concerns, were supported through training, conversations, and shadowing if necessary.

Members expressed agreement on the importance of seeing tangible results and noted that, while the plan contained many good elements, it was unclear what was already in place and what was planned. They mentioned that the language used in the plan was somewhat management-oriented and difficult to understand. Councillors sought clarity on how the plan was translating into tangible outcomes, given that similar themes were still being reported by witnesses. They also highlighted the importance of staff support, referencing witness testimony about the need for staff to have breaks from hearing harrowing stories. Councillors requested more specific details about staff welfare support in the plan, emphasising the need to encourage staff to remain with the Council and continue their valuable work.

**RESOLVED: That the Select Committee reviewed and noted the ongoing improvement works and the improvement this would have on the resident experience when approaching for housing advice and support.**

18. **COMPLAINTS TO THE HOUSING OMBUDSMAN SERVICE BY THE COUNCIL'S 'LANDLORD SERVICE' FOR 2023/2024** (*Agenda Item 7*)

Members raised no concerns or queries in relation to the report on the complaints to the Housing Ombudsman Service by the Council's 'Landlord Service' for 2024/2025.

**RESOLVED: That the Select Committee:**

- 1. Noted the 2023/24 submission to the Housing Ombudsman Service by the Council's 'Landlord Service' as part of meeting new Regulatory requirements; and**
- 2. Noted the recommendation to report to the Residents' Services Select Committee as part of the governance process on future annual submissions to the Housing Ombudsman Service, effective from 2024/25.**

19. **SPORTS FACILITIES, ENGAGEMENT AND INCLUSIVITY** (*Agenda Item 8*)

Priscilla Simpson, Sport and Physical Activity Team Manager, and Nicola McDermott, Sports Contract Manager were in attendance to answer clarification questions from Members in relation to the report set out in the agenda pack.

Members raised a question about the funding received for park tennis and why residents were still being charged £5 to use the tennis courts. The Officers explained that the funding was a grant issued by the LTA in 2019 to refurbish the courts, which had not been attended to for 10 to 15 years. The LTA recommended a charge for pay and play to ensure upkeep and maintenance. It was confirmed that the income generated from the charges was used to address anti-social behaviour and maintain the courts. Officers also highlighted the introduction of a cloud-operated booking system and the provision of a tennis programme including Tennis for Free and Free Parks Tennis through a tennis coaching company.

Members enquired why free tennis was not being offered in areas with anti-social behaviour, such as Rosedale and Harmondsworth. In response to this, officers responded that different initiatives were in place, including Free Parks Tennis coaching at Rosedale and plans to extend it to other areas. They emphasised the importance of building local community involvement through volunteer park tennis activators and linking in with schools and community groups.

Councillors sought further clarification regarding the usage of sports facilities and changes in demographics. Officers confirmed that they collected data using a tennis tracker on facility usage and demographics, and they aimed to engage and include various communities. They mentioned that most activities, apart from the £5 tennis, were offered for free and promoted through schools, local communities, social media, and Hillingdon People. Efforts to connect with different community groups and GP practices to promote healthier lifestyles were highlighted.

The Select Committee expressed interest in seeing the data on facility usage and engagement, noting that some events did not seem very inclusive. It was agreed that the data would be shared and it was confirmed that officers were committed to reaching hard-to-reach communities and integrating the programme into new developments.

Members requested further information about the 22 graded walks available in the Borough. It was confirmed that the information was available on the Council website and that officers had in the past distributed leaflets in GP practices and libraries. It was

acknowledged that stopping some of the production of paper forms might have led to some people not being aware of the programmes. Officers agreed to provide the requested information.

The Select Committee Davis raised concerns about the introduction of fees for using tennis courts and the lack of data on court usage before and after the fee was implemented. Resistance to the fee in areas like Rosedale was noted and free access in such areas was suggested to address the issue. Officers explained that the fee was introduced to cover maintenance costs and that they were working with a tennis coaching company to provide some free tennis opportunities in areas near the tennis courts.

Councillors discussed the promotion of sports activities, noting that physical leaflets were no longer being used and enquired about the use of display boards in town centres. The challenge of promoting activities was noted and officers emphasised the importance of using social media and other digital platforms to reach the community. They highlighted the difficulty of engaging certain demographics, such as the working population, teenage girls, and the older generation, and stressed the need for creative solutions to encourage participation.

Councillors raised questions about outdoor fitness programmes and the use of outdoor gyms in various parks. It was clarified that the outdoor gym facilities were managed by a team and that they were focusing on the most popular locations. Members also raised the issue of space constraints for seated exercise classes and the possibility of using facilities at Botwell Leisure Centre. Officers explained that they were working closely with the commissioned instructors of seated exercises and noted that there were some sessions that were less well attended and some that had increased attendance and that they were monitoring attendance and adjusting programmes as needed. Officers explained they were working closely with the Hillingdon Hospital and physiotherapy services to provide strength and balance classes in the community for residents.

In response to queries about the status of family fishing days, which had previously been managed by the Green Spaces team, it was confirmed that the Public Health team had not been historically involved in this activity.

Councillors offered their support in promoting activities within their wards, suggesting the use of social media and community spaces to raise awareness. Officers welcomed the offer and highlighted the importance of visibility and community engagement. They mentioned the success of the Parkrun initiative in Hayes and the Couch to 5K programme, which aimed to encourage more families, particularly black and minority ethnic groups, to participate in running and walking activities.

**RESOLVED: That the Residents' Services Select Committee noted the content of the report and asked any clarification questions as necessary.**

20. **FORWARD PLAN** (*Agenda Item 9*)

**RESOLVED: That the Forward Plan be noted.**

21. **WORK PROGRAMME** (*Agenda Item 10*)

Democratic Services informed Members that a site visit had been arranged for Select

	<p>Committee Members to visit the recycling facility in Edmonton on Wednesday 4 September 2024 from 09:45 – 10:45. Councillors were requested to confirm their attendance at their earliest convenience to enable safety boots to be sourced in preparation for the visit.</p> <p><b>RESOLVED: That the Work Programme be noted.</b></p>
	<p>The meeting, which commenced at 7.00 pm, closed at 9.08 pm.</p>

These are the minutes of the above meeting. For more information on any of the resolutions please contact Liz Penny, Democratic Services Officer on [epenny@hillington.gov.uk](mailto:epenny@hillington.gov.uk). Circulation of these minutes is to Councillors, officers, the press and members of the public.



## Review of Homelessness and the Customer Journey: Witness Session 5

<b>Committee name</b>	Residents' Services Select Committee
<b>Officer reporting</b>	Melissa Blower, Housing Project Manager
<b>Papers with report</b>	Scoping Report

### HEADLINES

This item relating to the Committee's major review is the fifth witness session and Members will hear from representatives of the Citizen's Advice Bureau.

### RECOMMENDATION:

**That the Residents' Services Select Committee notes the evidence heard at the witness session and seeks clarification as necessary in the context of its review of Homelessness and the Customer Journey in Hillingdon.**

### SUPPORTING INFORMATION

At its meeting on 16 January 2024, the Residents' Services Select Committee agreed to undertake a major review of the Council's Housing Advice and Homelessness Service, with a particular focus on the residents' journey through the system and customer service. The scoping report for the review was subsequently approved at the Select Committee meeting on 13 February 2024.

At this fifth witness session, a representative of the Citizen's Advice Bureau (Jas Nagra – Citizen's Advice Service Manager) will be in attendance to outline their role and answer any questions that may arise.

### Citizen's Advice Bureau

For 85 years, the Citizen's Advice Bureau (CAB) has been helping people by giving them the knowledge and the confidence they need to find a way forward. Their network of independent charities offers confidential advice online, over the phone, and in person, for free. The service is independent and totally impartial. People across the country can seek advice on a wide variety of matters including those relating to family, work, debt, immigration, health and housing.

CAB help millions of people every year. In 2022-23, this included:

- 42.7 million visits to their website
- 457,000 people helped face to face (more than double the previous year)
- 1.8 million people using their phone service
- 895,000 helped by email or webchat
- 79,000 witnesses supported through the Witness Service

Citizen's Advice provide support in approximately 1,600 locations across England and Wales with 14,000 volunteers and 8,843 staff. By helping people with the underlying cause of their problems and making sure they don't get worse, they save the Government and public services hundreds of millions of pounds every year.

## **Site Visits**

As part of the review, on Wednesday 22 May 2024, four Members of the Select Committee visited B&Bs in the Borough accompanied by the Counter Fraud Team. On Friday 24 / 31 May 2024 some Members also visited the customer contact centre and the Housing Reception at the Civic Centre to listen to calls and observe proceedings.

## **Terms of Reference**

The following Terms of Reference were noted for this review, subject to any changes agreed by the Committee:

1. To gain a thorough understanding of the Council's Homeless Prevention Service and the resident's journey through this process.
2. To scrutinise the service delivery and review its effectiveness.
3. To review service users' feedback to explore the challenges faced by residents accessing the service.
4. To look at other local authorities that may have different models of service delivery for best practice, including research and findings from charities, housing bodies, regional bodies and organisations, e.g. GLA.
5. Subject to the Committee's findings, to make any conclusions, propose practical and deliverable actions, service and policy recommendations to the decision-making Cabinet.

## **How this report benefits Hillingdon residents**

Select Committees directly engage residents in shaping policy and recommendations from the Committees are presented to Cabinet to consider, and ultimately seek to improve the way the Council provides services to residents.

## **Financial Implications**

None at this stage.

## **Legal Implications**

None at this stage.

## **BACKGROUND PAPERS**

NIL.



# **Residents' Services Select Committee Review Scoping Report - 2023/2024**

## **A Review of Homeless Prevention & the Customer Journey**

### **1. OBJECTIVES**

#### **Aim of the review**

At its meeting on 16 January 2024, the Residents' Services Select Committee agreed to undertake a major review of the Council's Housing Advice and Homelessness Service, with a particular focus on the residents' journey through the system and customer service.

This review aims to consider ways in which the customer journey could potentially be improved to better support residents during this process and improve residents' satisfaction with the way in which they access advice and support, to prevent homelessness. It is advised that the scope of any Select Committee's review is limited to the customer journey and how residents access the services and how advice is given as the homelessness process is set out in legislation. This will ensure any review can remain focussed.

#### **Terms of Reference**

The following Terms of Reference are suggested for the review, subject to any changes agreed by the Committee:

1. To gain a thorough understanding of the Council's Homeless Prevention Service and the resident's journey through this process.
2. To scrutinise the service delivery and review its effectiveness.

3. To review service users' feedback to explore the challenges faced by residents accessing the service.
4. To look at other local authorities that may have different models of service delivery for best practice, including research and findings from charities, housing bodies, regional bodies and organisations, e.g. GLA.
5. Subject to the Committee's findings, to make any conclusions, propose practical and deliverable actions, service and policy recommendations to the decision-making Cabinet.

## **2. BACKGROUND**

### **National Context**

The quarterly data published by the Department for Levelling Up, Homes and Communities (DLUHC) shows that nationally demand for affordable housing has risen sharply, with homelessness presentations to local authorities a particular pressure. At the end of June 2023, nearly 139,000 families with children were living in temporary accommodation – 7,430 more than at the end of March. 68,070 families with children were living in temporary accommodation (TA) at the end of June, 7,510 in B&Bs; a 93% increase over one year.

Nationally, there were circa 21,000 homeless acceptances in the second quarter of the year, an increase of 19% on a year ago.

There has been an 18% increase in the number of households who were homeless and helped by councils as a result of no-fault evictions.

London Councils has urged the Government to end the freeze on Local Housing Allowance (LHA) to prevent almost 60,000 Londoners in the private rented sector from becoming homeless over the next six years.

Research, which was commissioned by a cross-party group and carried out by Alma Economics, has estimated that an additional 16,500 to 22,000 London households will become homeless by 2030 unless the LHA is raised. London Councils stated that 22,000 households equate to 58,740 individuals, including 28,000 children. One in seven private renters in London are reliant on LHA to meet their housing costs.

The research suggested that restoring LHA to cover at least 30 per cent of local market rents would save the public finances in London more than £100m each year. The majority of these savings would come from reduced pressure on London boroughs' homelessness services, but also from lower costs to other parts of the public sector such as the NHS and social care. London accounts for more than half (57 per cent) of England's total number of homeless households in temporary accommodation.

In August, London Councils found that almost 170,000 Londoners were homeless and living in temporary accommodation arranged by their local authority. This is equivalent to around one in 50 Londoners overall and one in 23 children in the capital.

Turbulence in the capital's private rented sector is a "critical factor" behind the growing numbers of homeless Londoners. Research from the group and partners, published in July 2023, revealed a 41 per cent drop in private rental listings in the capital since 2020, while listed rental prices rose by 20 per cent.

The Autumn statement 2023 has announced that LHA is to be restored to 30% percentile local market rents for 2024/25 and then held at that level in cash terms.

## Local Context

In Hillingdon we have seen a 27% increase in Homeless Presentations since the same period last year. We are receiving on average 100 new approaches each week for housing advice and support. The main reason for homelessness remains the ending of private rented tenancies with 27% of approaches being for this reason.

Households leaving friends or family accommodation represent 24% of all approaches and those requiring a move due to domestic abuse is just under 8%. The Council has also seen a considerable increase this year in households leaving asylum accommodation following receipt of their status and this represents 10% of all approaches.

The increase in presentations coupled with the lack of affordable private rented accommodation has placed considerable pressure on the service with the use of temporary accommodation now at 1,126 which is an increase of 492 since 2022/23.

## Legislative Context

Any homeless decisions must be made in line with the Homeless Reduction Act 2017 and the Housing Act 1996 Part VII amended in 2002.

Anyone who is eligible can access advice on how they are able to resolve their situation or where to look for alternative accommodation but to be entitled to a full homeless duty, residents must meet the below five criteria.

- **Homeless or threatened with homelessness** - within 56 days. This can be due to notice being served or because the property is unsafe for the person to continue to reside within.
- **Eligible** – this relates to a person's immigration status, persons without recourse to public funds or those that are not considered habitually resident are not eligible.
- **Priority need** – this can be granted due to a number of reasons; for example, the person may have dependent children, be at risk of domestic abuse or be vulnerable as a result of a health condition or disability.
- **Not be intentionally homeless** – this is when a person has deliberately done something to cause them to lose their home for example caused anti-social behaviour or did not pay the rent when they could afford to do so.

- **Have a Local Connection** – the person has resided within the area or have close family living within the area for a prescribed period of time.

## **Continuous Service Improvement**

The Council has a homeless service improvement programme (Project Neptune) in place that is implementing change and improvement across twelve workstreams. These are:

1. Strategy
2. Leadership
3. Performance
4. People
5. Systems
6. Resources
7. Entice (web & messaging)
8. Engage (accessing the service)
9. Experience (case management)
10. Exit (access to accommodation)
11. Embed (develop learning from the latest trends or demands)
12. Broader Issues

Since the project began in July 2023 there have been several changes delivered within the service and work remains ongoing to make the relevant service improvements.

One of the ways in which the Council has improved the customer journey is through the reinstatement of the triage function. This means that following submission of an application for housing advice and assistance, residents receive contact within 48 hours from an officer who can advise them on the supporting information they need for their application. This not only means that the Council remains in close contact with the resident but also ensures their case is allocated to a caseworker as soon as possible. Upon the case being allocated the resident is then sent an update on who their caseworker is, along with their caseworker's direct contact details and a link to be able to book an appointment with their caseworker at a mutually agreeable time.

Work is currently ongoing to review the website and the information available to residents to ensure that the Council's website offers support to those looking for advice, whilst also ensuring that the Council is setting expectations from the first point of contact about the type of support on offer.

Work also continues to review our ICT systems to reduce the administrative burden on staff to create further capacity for officers to support residents with their housing situations.

We have also developed a fresh training offer for staff new into the service and have been delivering a programme of development for our existing staff to ensure officers

have the relevant skills and knowledge to support our residents in need of housing advice.

### **Connected work**

The internal audit progress review report dated 31 January 2024 indicates that limited assurance was given on homeless housing applications and states that:

“To avoid duplicating the wider housing transformation project this review focused on the operational management of homeless housing applications.

Testing identified weaknesses with the completion of documentation, including insufficient evidence of any segregation of duties with regards to approving decisions. We found no evidence to suggest the applications tested were not eligible for the support they received, however the gaps in the controls may have allowed other fraudulent applications.

Demand pressures and ongoing changes within the service also contributed to our findings in relation to the wider governance arrangements within the Service. However, these are being addressed as part of the wider housing transformation project.

Internal Audit was also able to see evidence of proactive preventative action being taken to reduce demand on the service. Key performance indicators in relation to these preventative measures are in place to help ensure appropriate action is taken.”

### **Executive Responsibilities**

The portfolio Cabinet Member responsible is Councillor Eddie Lavery.

## **3. EVIDENCE & ENQUIRY**

### **Potential witnesses (including service users)**

- Dan Kennedy – Corporate Director of Central Services
- Maggie Nelson – Head of Housing Needs
- Debby Weller – Head of Strategy & Policy
- Melissa Blower – Housing Project Manager
- Representatives from other local authorities / housing organisations / charities, e.g. Citizens Advice Bureau, P3, Trinity, Thames Reach and Bell Farm Christian Centre
- service users (local residents who have required housing assistance)
- social prescribers

### **Lines of Enquiry**

Lines of enquiry can be expanded as the review progresses or included in relevant witness session reports. However, lines of enquiry may include:

- establishing how effectively the housing advice service is being delivered.
- focus on the end user and how they have found the service in practice.
- exploring what support functions are in place and whether these can be improved.
- experiences from other local authorities and housing related organisations

### **Potential Witnesses**

Witnesses will be identified by the Committee in consultation with relevant officers.

### **Surveys, site-visits or other fact-finding events**

Such opportunities will be identified as the review progresses and could include a site visit to Housing Services Reception or a particular advice surgery.

### **Performance data and future information that may be required**

To undertake this review the following data sources could be examined and provided:

- Anonymous summary details of Members’ Enquiries, Service Requests and Customer complaints or suggestions received relating to residents' housing experiences.
- Satisfaction surveys or other feedback methods of eliciting customer feedback on their journey and experience e.g. mystery shopping.
- Case studies.
- Ombudsman decisions.
- Further information may also be identified as the review progresses.

## **4. REVIEW PLANNING & TIMETABLE**

Proposed timeframe & milestones for the review:

<b>Meeting Date</b>	<b>Action</b>	<b>Purpose / theme</b>	<b>Witnesses / officers attending</b>
16 January 2024	Agree Review Topic	Information and analysis	Dan Kennedy Melissa Blower Debby Weller Maggie Nelson
13 February 2024	Agree Scoping Report	Information and analysis	Melissa Blower
13 March 2024	Witness Session 1	Information and analysis	Dan Kennedy Melissa Blower



			Maggie Nelson
16 April 2024	Witness Session 2	Information and analysis	Dan Kennedy Trinity
13 June 2024	Witness Session 3	Information and analysis	Dan Kennedy  Thames Reach P3
18 July 2024	Witness Session 4	Information and analysis	Melissa Blower Dan Kennedy  IDVAs Social Prescribers
24 September 2024	Witness Session 5	Information and analysis	Citizen's Advice Bureau  Written Submissions
Outside the Committee – Survey, networking session, consultation, informal meeting with users, site visit, mystery shopper etc...			
27 November 2024	De-brief and emerging findings	To discuss key findings and identify potential recommendations	
19 February 2025	Approval of draft final report	Proposals – agree recommendations and final draft report to Cabinet	

### Resource requirements

None.

### Equalities impact

The 2010 Equality Act outlines the provisions of the Public Sector Equalities Duty which requires Public Bodies to have due regard to the need to:

- eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010.
- advance equality of opportunity between people from different groups.

- foster good relations between people from different groups.

The broad purpose of this duty is to integrate considerations of equality into day-to-day business and keep them under review in decision making, the design of policies and the delivery of services. There are no equality impact issues relating to the matters set out in this report.

### **Background Papers / further reading**

[Housing advice - Hillingdon Council](#)

## RESIDENTS’ SERVICES SELECT COMMITTEE - SAFER HILLINGDON PARTNERSHIP REPORT

<b>Committee name</b>	Residents’ Services Select Committee
<b>Officer reporting</b>	Richard Webb, Director of Community Safety and Enforcement
<b>Papers with report</b>	Appendix 1 – Safer Hillingdon Partnership development plan Appendix 2 – MPS Report
<b>Ward</b>	All

### HEADLINES

As part of its statutory responsibility to undertake crime and disorder scrutiny, this report provides the Residents’ Services Select Committee with a report from the Metropolitan Police Service and an update on the work of the Safer Hillingdon Partnership, as the statutory community safety partnership for the Borough.

### RECOMMENDATION:

**That the Residents’ Services Select Committee notes the contents of the reports and asks questions in order to clarify matters of concern or interest in the Borough.**

### SUPPORTING INFORMATION

The Residents’ Services Select Committee acts as a Crime and Disorder Committee as defined in the Crime and Disorder (Overview and Scrutiny) Regulations 2009 and carries out the bi-annual scrutiny of decisions made, or other action taken, in connection with the discharge by the responsible authorities of their crime and disorder functions.

### Witnesses

Chief Inspector Ben Wright, MPS, will be attending the meeting to answer questions relating to crime in the Borough and the Policing response to that crime.

Richard Webb, Director of Community Safety and Enforcement for Hillingdon Council will attend the meeting to answer questions relating to the Safer Hillingdon Partnership and the work of the Council to prevent and reduce crime.

### Supporting information

In December 2023 the Safer Hillingdon Partnership agreed new priorities for 2024. Those priorities are-

- 1) Violence Against Women and Girls (VAWG) and domestic abuse.
- 2) Combatting drugs (from a community safety perspective).
- 3) Anti-Social Behaviour.
- 4) Other violent crime including meeting the serious violence duty and knife crime.

In March 2023, the Safer Hillingdon Partnership agreed a development plan to support it to meet its statutory responsibilities and address these priorities. The main focus of the partnership since that time has been to develop a new strategic community safety assessment for Hillingdon to provide the basis for a new Partnership strategy (the last strategy covered the period up to March 2023). The development plan is included in Appendix 1 of this paper.

The Partnership has established a new Serious Violence Sub-Group to coordinate the development of a plan to reduce serious violence in the Borough. The operational focus of this group has been on establishing a programme of activity to reduce serious violence in Hayes. The Violence Reduction Unit has allocated £280k funding over 2 years for violence reduction programmes in Hayes. This funding will be used to support violence prevention projects including increased sporting opportunities and schools based educational programmes. The programme was informed by a school survey of young people to identify areas of concern and opportunities for development. A Coordinator is being appointed to lead this work and bring together relevant locally based organisations to maximise the impact of the funding.

A partnership 'Cuckooing' protocol has also been developed and agreed by the Safeguarding Board to improve the response to criminal exploitation of vulnerable people in the Borough and as part of its work under the partnership's ASB priority. Training is being developed for October on identifying cuckooing and on applying the protocol to protect vulnerable people and reduce the impact of cuckooing on local communities.

The Safer Hillingdon Partnership oversees three further sub-groups. The Council's response to domestic abuse in the Borough is led by the Domestic Abuse Steering Executive and the partnership delivery of the Prevent duties is led by the Prevent Partnership. The Prevent Partnership recently completed the annual assurance assessment against the Home Office Prevent benchmarks and achieved a good level of assurance that the benchmarks are being met. The Hillingdon Combatting Drugs and Alcohol Partnership also reports to the Safer Hillingdon Partnership to provide oversight of the delivery of the national Harm to Hope, Drug and Alcohol Strategy at a local level. The Board reports to the Safer Hillingdon Partnership to ensure there is oversight of the work of the Board and the use of funding allocated to support the delivery of the strategy.

In February 2024 a new joint Police and Council community safety problem solving approach commenced for the Borough. This approach involves a monthly meeting of key senior officers from the Police and Council during which information on new or emerging community safety risks is shared and decisions made on how we collectively respond to those risks. This meeting is intended to ensure there is a shared understanding of the community safety related threat, risk and harm in Hillingdon and to enhance our collaborative response to the community safety issues most likely to impact on Hillingdon residents and communities. By reviewing new issues monthly, the forum supports the longer-term planning approach reflected in the Safer Hillingdon Partnership Plans through providing a mechanism to ensure we respond promptly to new and emerging risks.

### **Financial Implications**

None at this stage.

### **Legal Implications**

None at this stage.

## Appendix 1 – Safer Hillingdon Partnership Development Plan

Milestone	Activity
February 2024	Commence work on Strategic & Domestic Abuse Needs Assessment
March 2024	SHP agree to: - Formation of Serious Violence Delivery Group, - To receive quarterly updates on local priorities, SHP benchmarking assessment and a quarterly risk register
April 2024	Draft Crime and Disorder Survey prepared
May 2024	Crime & Disorder Survey finalised and goes live ( <i>after Mayoral election</i> )
June/July 2024	SHP receives quarterly update reports on priorities/statutory responsibilities and proposals for new outcomes monitoring dashboard
June/July 2024	Introduce SHP benchmarking tool and risk register as standing agenda items
June/July 2024	Refreshed Information Sharing Protocol signed off
July 2024	Crime and Disorder survey closes
August 2024	Draft "strategic needs assessment" (including enhanced serious violence needs assessment) and bespoke "Needs assessment for domestic abuse" available
August 2024	Draft SHP Strategy and Plan shared
Sept 2024	Crime and Disorder survey results report
Sept 2024	SNA completed and ready for next SHP
Sept 2024	3 Year SHP Strategy and Plan presented for initial comment by SHP
Oct/Nov 2024	SHP receives quarterly update reports on priorities/statutory responsibilities and new outcomes monitoring dashboard
Oct/Nov 2024	SHP benchmarking tool and risk register as standing agenda item
Oct/Nov 2024	SHP Terms of Reference annual review
Nov 2024	SHP Public Meeting ( <i>General election dependant</i> )
Dec. 2024	3 Year SHP Strategy and Plan finalised and ready for publication Refreshed Serious Violence Strategy finalised.
<b>Jan. 2025</b>	<b>3 Year SHP Strategy and Plan published</b> <b>Updated Serious Violence Strategy published</b>

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## Metropolitan Police Service (MPS)

### **Overarching Introduction and Performance**

The Metropolitan Police Service's West Area Basic Command Unit (BCU) incorporates the London Boroughs of Ealing, Hillingdon and Hounslow. As with all of London's 12 BCUs, West Area (WA) is segmented into five business areas: Response Teams, Neighbourhoods, Local Investigations (CID), Public Protection and HQ.

### **Response Teams**

Response Teams lead the immediate response to incidents across the Hillingdon area. Response also have an investigative capacity which aims to ensure investigations are taken over from the emergency response officers to keep as many officers out on the streets as possible and they also have responsibility for the initial risk assessments and investigations relating to persons reported missing.

### **Neighbourhoods**

The Neighbourhoods business area incorporates the local police (safer neighbourhoods) teams, including Dedicated Ward Officers (DWOs) for every ward. Unless there is a critical operational demand, DWO's are ring-fenced from abstraction into other duties (for example, covering Response shifts or aid in other parts of the capital). Neighbourhoods also incorporates: Safer School Officers, Youth Engagement and Diversions Teams, Faith Engagement Officers, Licensing and ASB Teams.

### **Local Investigations**

The Local Investigations strand oversees the more serious and complex crime types. It also has responsibility for delivering the BCU's work on offender management and how gang issues are addressed. This business area includes teams which deal reactively to crimes, as well as an important proactive unit; this strand also own and manage the BCU's approach to investigating and reducing violent crime across Hillingdon and Youth Offending Teams.

### **Public Protection**

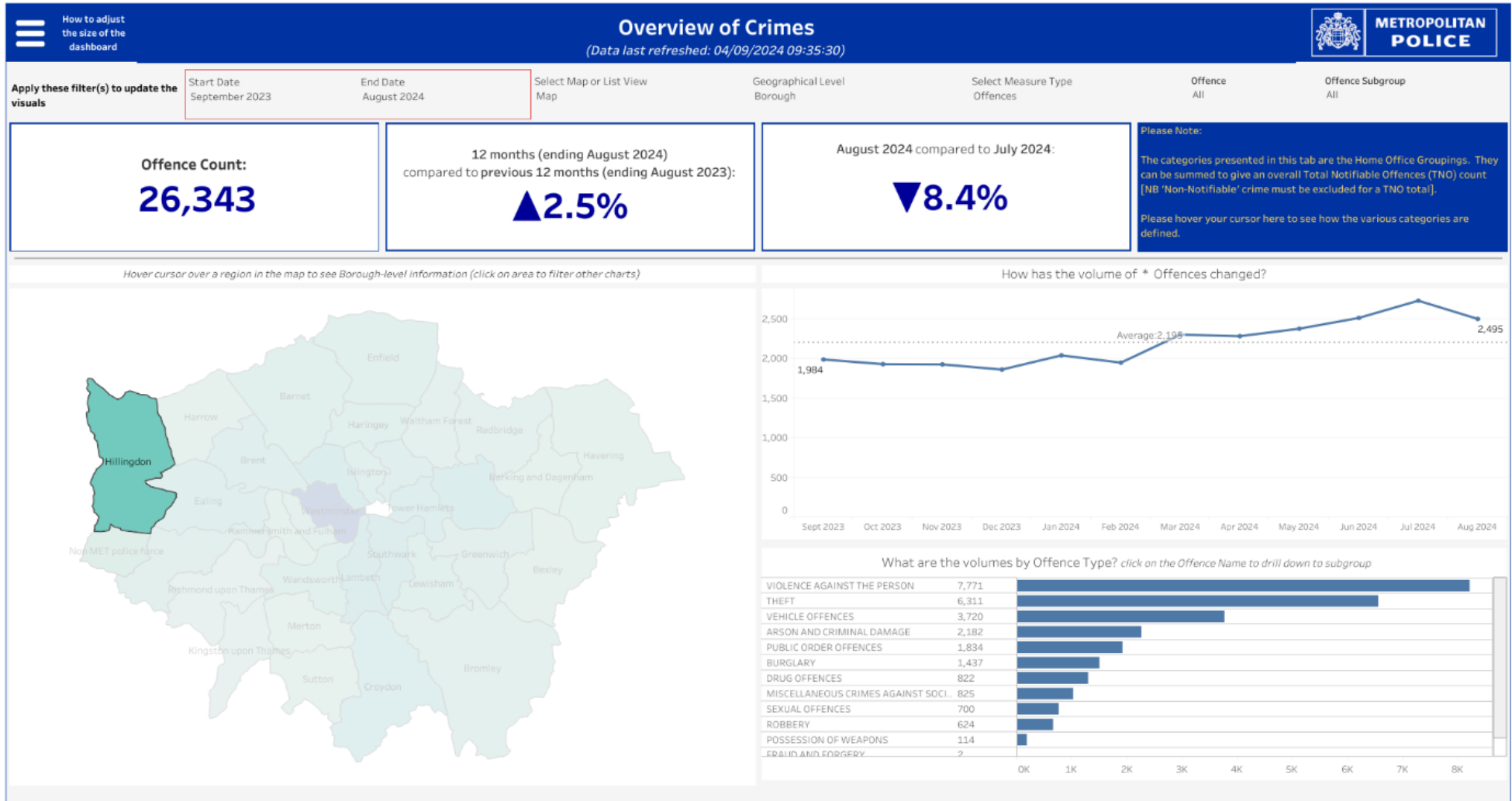
Public Protection have the responsibility for investigating child abuse, rape and domestic abuse offences. It also takes the lead on high risk missing person investigations and hate crime. Key to Public Protection's work is ensuring a more joined up and victim-focused service and officers are expected to work closely with the council and other partners to achieve this.

### **HQ**

The HQ business area has responsibility for the Basic command Unit (BCU) Ops Room, which is the local MPS control hub. This is responsible for joined up command and control 24 hours a day BCU wide. Other areas of HQ responsibility include: resourcing, professional standards, training fleet management, business continuity, Criminal Justice, finance and estates.

**Performance:**

Hillingdon is amongst the 10 safest boroughs in London. The overall crime rate in 2023 was 91 crimes per 1000. This compares favourably to London's overall crime rate, coming in 13% lower than the London rate of 105 per 1000 daytime population.





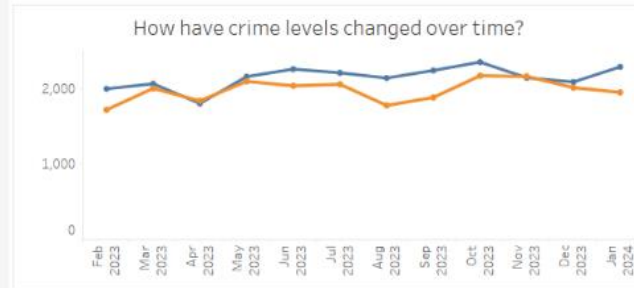
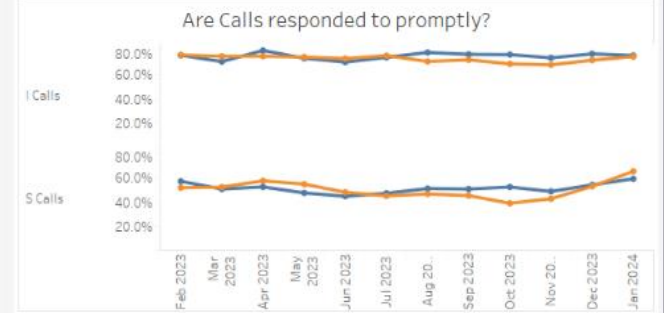
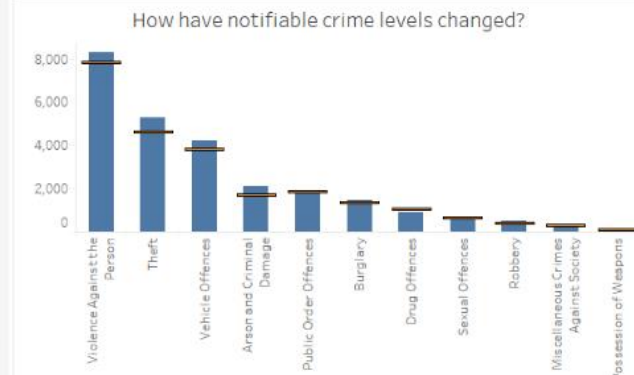
### Summary of Crimes in Hillingdon This Year

<p><b>Offences h</b></p> <p><b>25,739</b></p> <p>offences recorded +1,580 (+6.5%) MORE than previous period</p>	<p><b>PO Rate i</b></p> <p><b>7.0%</b></p> <p>Positive Outcome Rate A DECREASE of -2.4% ppt</p>	<p><b>'I Calls' Calls in Target h</b></p> <p><b>75.4%</b></p> <p>in target AN INCREASE of +2.2% ppt</p>	<p><b>'S Calls' Calls in Target h</b></p> <p><b>51.4%</b></p> <p>in target AN INCREASE of +0.9% ppt</p>	<p><b>ASB Calls h</b></p> <p><b>6,502</b></p> <p>ASB calls received +63 (+1.0%) MORE</p>	<p><b>Stop &amp; Search i</b></p> <p><b>2,764</b></p> <p>Stop &amp; Search -1,362 (-33.0%) FEWER</p> <p><a href="#">Click here to go to the Stops dashboard</a></p>	<p>Named Suspects: <b>11,502</b></p> <p>Wanted Offenders: ...</p> <p>(last updated 08 May 2022)</p> <p><a href="#">Click here to go to the OMR</a></p>
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Click on a region in the map to filter charts and tables by region, and to see ward-level information



Offences are counted by 'owning' BICU/Borough: Some may be associated with a crime in ward outside of their borders. NB Only wards that have a count in the time period selected will appear.



#### What is driving ASB?

Category	ASB Calls	% of ASB Calls
Rowdy Or Inconsiderate Behaviour	3,425	52.7%
Rowdy _ Nuisance Neighbours	997	15.3%
Null	578	8.9%
Veh Nuisance _ Inappropriate Use	567	8.7%
Noise	285	4.4%
Trespass	164	2.5%

(12 months ending August 2024 compared to previous 12 months ending August 2023)

Robbery increased by 35% and Theft Offences by 17%. This was higher than London wide increases for these crime types which were at 11% and 15% respectively. This rise is accounted to new home office counting rules, whereby Violent shoplifting offences are falling into this category. Additionally the introduction of Connect to record crimes has paired Heathrow Airport figures into the Borough figures. We are in the process of amending this with our data office to remove Heathrow Airport crimes from our stats.

Tackling violent crime and a focus on addressing Male Violence Against Women and Girls were priorities of West Area BCU across 2023 and into 2024, which helped the Borough to experience a decrease in violence against the person crime of 2.5% and a 6% increase in sexual offences. The focus on tackling violent crime in Hillingdon has seen some notable achievements, including a 6% reduction in knife crime with injury, a 23% decrease in possession of weapons offences and within the age group of 1-24 years the number of knife crime injury victims reduced by 24%.

Sanction detection rate indicates the rate of offences that resolve with a formal sanction to the offender. This does not necessarily mean a *conviction*; it may include a range of other sanctions including:

- The suspect being charged or summonsed
- The suspect being cautioned, reprimanded or given a final warning
- The suspect receiving a Penalty Notice for Disorder (PND) or other Fixed Penalty Notice (FPN)
- System was put in place to correctly record them as PNDs for the relevant offence

As with the Metropolitan Police Service area as a whole, Hillingdon's sanction detection rate had been in steady decline over a number of years. This sharp decline has been driven by a number of factors, most notably:

- The overall reduction in police numbers and resourcing per head of population
- Changes in recording process and the steady uplift in overall crime figures
- Changes in detection targets and actions taken by certain forces to meet these
- The increasing reliance on Police to 'fill the gap' for other services, such as in responding to clients in mental health crisis

### **Trust and Confidence:**

West Area Police recognise the scale of public concern following a number of cases involving MPS Officers which have involved behaviours which have truly been shocking and totally unacceptable to the Metropolitan Police Service and the public they serve. The scale of the challenge faced by the MPS is evidenced in the report of Baroness Casey. Significant reforms are already occurring, which will impact across London and locally in Hillingdon to ensure police improve trust with local communities and address the need to identify those officers who are unfit to be in the MPS.

The New Met for London Plan is directly aimed at improving public trust and confidence in London policing and will see additional investment into Neighbourhood Policing including uplifts in Sergeant and PCSO numbers

### **Emergency Response Policing Teams 2024:**

ERPTs respond to emergency calls and deal with ongoing incidents. They also undertake scheduled visits to members of the public reporting crime. ERPT provide a deterrent in response to crime trends by patrolling identified crime 'hot spots' and are a Met-wide flexible resource to respond to central Public Order Aid and force mobilisation. ERPT also investigate higher volume, non-complex crimes, offering immediate victim / Police contact to improve victim care and provide clear ownership of investigations.

The West Area Basic Command Unit (BCU) response teams are located in three patrol bases, one in each borough, with the Hillingdon Patrol Base situated in Uxbridge. Due to a number of significant central policing events over 2024 (volume of protests and sporting events), resourcing has been a challenge.

### **Neighbourhoods and Partnership:**

Neighbourhoods is at the heart of the mission to deliver less crime, more trust and high standards. We need to reconnect with local people, truly listen to their crime and ASB concerns, and take effective action. Community crime fighting plans will be pivotal in achieving this and is a key strategy priority.

The plans are fundamentally shaped by our principles. They will help ensure we are putting communities first – the process of building the plans from ward priorities will mean they are genuinely co-produced. By listening to our communities, particularly those whom we might have failed to engage effectively in the past, the plans will be inclusive, and will help give our officers and staff clear direction.

Our community safety partners will be key stakeholders but so will other parts of the Met who might not necessary have worked in communities before. Collaboration will be vital, as will the use of data and insight to ensure we use our time and resources effectively.

Our approach to community crime fighting are determined by a number of key commitments outlined in a New Met for London, including having at least 2 DWOs and 1 PCSO in every ward, maintaining a bespoke set of crime priorities for each ward, and that we will do more to support neighbourhoods blighted by crime – Clear Hold Build.

The manner in which we deliver our Community Crime Fighting plans is as important as the tactics we employ. For instance, ensuring our ward priorities consider the widest range of local perspectives will be key to showing that we respect and care for all our communities. We recognise that at times we might have to either refer complaints to other more suitable agencies or have to prioritise more pressing issues. However, by caring for our communities, listening and taking the time to explain decisions, and doing the right thing we will bring people with us.

Fundamentally, our teams, led by their Neighbourhood Superintendent, will be accountable for reducing crime (via the borough objectives) and therefore increasing confidence in the MPS.

### **Stop and Search:**

West Area police recognise the importance of working hard to address any disproportionality issues regarding stop and search on Hillingdon Borough and provide assurances that they have proper review mechanisms in place to ensure this policing power is used appropriately. To this end a number of work streams have been progressed and developed in including:

### **Youth Scrutiny Panels (YSPs):**

This platform is used to raise awareness amongst young people of their rights when stopped by police and the mandatory information (GO WISELY) that the officer will provide before the search is conducted. This platform also assists officers in understanding the lived experiences faced by young persons in Hillingdon through poor use of stop and search powers.

### **Community Monitoring Groups (CMGs):**

We share information with our CMGs for each borough and there are 24 meetings planned every year. CMGs view the data of stop and search and how many were conducted within the last 3 month period, positive outcomes and most used section by officers. CMGs also attend police stations to view Body Worn Video (BWV) footage together with police. This is to ensure our powers and force used is reasonable and justified. Any concerns in relation to a stop and search encounter is reviewed and officers are spoken to.

### **Section 60s:**

West Area has introduced post S60 briefing which includes the local CMG and Hillingdon Local Authority partners attending a 30 minute post S60 debrief session. During this, the group monitor the duration, geographical area and whether a Superintendent was informed of this or not. If the duration or area covered by the S60 is beyond what the intelligence/information would suggest is proportionate then the authorising officer is spoken to and asked for an explanation and any learning disseminated accordingly.

### **Police Officer Training:**

Young Persons now attend training sessions for New West Area police officers with social workers to observe stop and search training by West Areas Learning and Development team. This takes place every 5 weeks subject to availability of social workers and young persons. These sessions have also benefited new officers as they had input from young persons on previous stop and search which impacted the trust and confidence of the community. New officers learn directly from the input given by young persons.

### **Disproportionality / Quality Assurance:**

To ensure West Area police on Hillingdon are not misusing this power, police supervisors dip sample around 100 stop and search encounters every month. This is ongoing and any concerns are addressed with officers/supervisors. As with every BCU, Hillingdon's stop and search data is updated and published regularly, making it available to all. As with previous years, most of the stops in Hillingdon during 2024 were conducted on males (over 90%). 14% of those stopped were under 18 years old.

In 2024, regarding stops by ethnic appearance, more white people were stopped in Hillingdon than any other ethnic group classed by ethnic appearance with this group accounting for 39% of stops. 27% were of black individuals and 26% of Asian appearance. In terms of

proportionality, stops by ethnic appearance by 1,000 of the population broke down as: 0.34 for persons defined as white, 0.88 for persons defined as black and 0.59 for persons classed as Asian.

Conversely, there was under-representation in the stops on people in other ethnic groupings. While the proportion of stops of Asian individuals was broadly in line with Borough demographics, white people were stopped only 0.73 times than would have been proportionate based on the Borough's population, and those in 'other' ethnic categories were stopped only 0.56 times than the proportionate level. There was a lower positive outcome rate for stops of Black and Asian people.

Looking at outcomes, 64% of stops led to no further action with 17% leading to arrest.

### **Neighbourhood Team Activity Highlights:**

**Op Nightingale:** This operation is focused in Uxbridge and was initiated in 2022 but will continue through 2024, with Hayes Town now also being included. Op Nightingale essentially aims to increase uniform policing presence in key demand locations whilst also enacting longer-term problem solving. As part of this, the BCU obtained over £100,000 for initiatives.

**Ask for Angela:** An ongoing operation providing education to local town centres / night time economy. Teaching the local community and businesses how a VAWG victim can ask for help "by asking for Angela". Teams are continuing to attend local pubs and clubs (in plain cloths) completing test visits "asking for Angela". This information is then recorded as a pass or fail by the venue and education again provided to the businesses.

**Neighbourhood Policing Week of Action:** This week of action took place across Hillingdon which aimed to highlight the work undertaken by neighbourhood policing, to drive crime down, engage with the local communities and bring offenders to justice. This saw activity including:

- Walk and Talk initiatives
- Licencing Visits to Pubs, Off licences and any problematic premises
- Visiting rough sleepers / homeless persons.
- Weapon sweeps with members of the public in open space areas

Targeting our outstanding and wanted offenders.

### **Op Retail:**

Most prolific retail theft offenders and venues identified. Local officers have built relationships with the venues, identifying the most prolific offenders, target hardening and working together to reduce offending.

Over the last 12 months the MPS has a positive outcome rate of 6% for business crime, which is trending down during the period. Hillingdon has a positive outcome rate of over 7%, showing a steady increase since Op retail started at the beginning of 2024 from 40 positive outcomes per month to 166 in August 24.

For offenders, one CBO has been issued at court, four are going through the court process, and three more are ready to be issued.

### **Local Investigations (LI)**

West Area Local Investigations (LI) strands throughout the MPS hold responsibility for the investigation of serious and complex crime, utilising proactive and reactive asset to explore disruption, enforcement, engagement, diversion and rehabilitation opportunities. In accordance with Met Direction and MOPAC, performance is focussed towards MPS operational priorities:

#### **1. Focus on what matters to Londoners**

Violent crime tops public concerns and includes, terrorism, knife and gun crime, sexual offending, domestic abuse and safeguarding vulnerable people from predatory behaviour.

#### **2. Work more closely with partners and the public**

Safety requires action and intervention beyond the police service and revolves around developing key relationships with partners and communities, to keep communities safe and prevent crime from taking place.

#### **3. Achieve the best outcomes in the pursuit of justice and in the support of victims**

Ensure victims receive the best possible outcome by proactively managing offenders and delivering justice and support to victims.

#### **Weekly Violence Meeting**

This Pan-BCU meeting takes place every Thursday and includes representation from all policing strands and from Ealing, Hillingdon and Hounslow local authorities. Hillingdon are represented by senior management from safer communities, as well as the Violence Reduction Coordinator and CCTV manager. The forum is primarily focussed on reviewing and addressing serious violence, violence against women and girls, burglary and robbery, with the flexibility to amend agenda according to operational need. Analytical products provide an overview of the previous seven days and examine common themes, trends and hotspots, allowing forward facing strategic planning and effective multi-agency risk management.

#### **Detective Growth and Experience:**

As an organisation, the MPS continues to experience challenges in terms of the level of Detective experience within its Criminal Investigation Departments (both within the LI and PP strands). The MPS has introduced a number of schemes to increase the growth numbers of Detectives within the organisation such as the direct entry detective scheme. However, the levels of experience in the detective constable rank still possess a challenge for LI.

#### **Public Protection:**

Public Protection covers a range of serious and complex crimes that often affect the most vulnerable in a community. Within WA BCU, Public Protection encompasses multiple strands, including child abuse; domestic abuse, stalking and harassment; exploitation (CSE and CCE), harmful practices, hate crime, mental health, missing people, online child sex abuse and exploitation, rape and serious sexual offences and abuse and neglect of vulnerable adults. It also incorporates our child abuse referrals team and our MASH desks. Supporting our

investigation teams is our Predatory Offender Unit. WA Public Protection teams cover three London Boroughs; Ealing, Hillingdon and Hounslow.

### **Domestic Abuse:**

Hillingdon, like many other London boroughs, has seen increases in recorded domestic abuse crime in recent years – a crime we know disproportionately affects women. WA has continued to see the highest volume of both domestic abuse incidents and domestic abuse offences across the Met.

Despite recent yearly increases, Hillingdon Borough recorded 3,577 domestic abuse offences in the 2023/2024 year, which was a reduction of 11% on the previous year.

### **Child Exploitation Team:**

Throughout 2024, we have continued to work closely with partners to ensure child exploitation (both sexual and criminal exploitation) is identified and investigated, and that those children and young people who are affected by predatory behaviour are supported and kept safe. Our Child Exploitation Team work alongside other policing teams, including WA's Gangs Unit and Missing Persons, and engage with partners at the Multi-Agency Vulnerability and Exploitation (MAVES), including Children's Social Care, Health, Education, Youth Offending Services and Safer Communities as well as third sector partners.

### **Online Child Sexual Abuse and Exploitation team (OCSAE):**

The demands placed on the investigation team are significant, both in terms of volume and the impact such crime types can have on their own welfare. The team have achieved some excellent results, executing warrants and securing charges against individuals who are accused of possession and often distributing hundreds of indecent images of children, of the most serious category.

### **Criminal Justice**

The Criminal Justice Unit are responsible for ensuring that Case Files are completed by Officers and that these files are of a sufficient standard.

One of the main challenges for the Criminal Justice locally and across the MPS is the introduction of Connect, which is a new system for the preparation of Case Papers. This is one of the biggest IT uplifts undertaken by the MPS and as expected implementation has been challenging but will deliver longer-term benefits in relation to workflow efficiency and intelligence collation.

The aim over the next 12 months for the Criminal Justice department will be to build on the opportunities presented by Connect to improve the standard of case files to ensure the right court outcomes.

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## STATEMENT OF GAMBLING POLICY CONSULTATION

<b>Committee name</b>	Residents' Services Select Committee
<b>Officer reporting</b>	Daniel Ferrer, Licensing Manager
<b>Papers with report</b>	Overview of proposed policy changes - Appendix A Draft Statement of Gambling Policy - Appendix B Equality Impact Assessment - Appendix C
<b>Ward</b>	All

### HEADLINES

This report is to consult with and invite comments from the Committee on the updated draft Statement of Gambling Policy.

This Policy is deemed as 'Policy Framework' under the Council's constitution and so requires full approval by full Council.

### RECOMMENDATION:

**That the Residents' Services Select Committee considers the revisions to the Statement of Gambling Policy and offers comments to be considered by Cabinet at the end of the consultation period.**

### SUPPORTING INFORMATION

The Council is required to review its Statement of Gambling Policy at regular intervals to ensure it is carrying out licensing functions in accordance with current legislation. During this review, consideration has been given to how changes might improve the way in which services are being delivered, to make them more efficient and customer friendly.

A draft Policy has been produced which now needs to be consulted upon, prior to final consideration by Cabinet or adoption by full Council.

The Gambling Act 2005 sets out how gambling in Great Britain is regulated. It came fully into force in September 2007, and covers arcades, betting shops, bingo premises, casinos, gaming machines, society lotteries, and remote gambling (including online gambling). It also created and set the functions and objectives of the Gambling Commission as the principal regulator. The Council is required to review the Statement of Gambling Policy every three years. The current policy was last formally reviewed in 2022 and therefore requires updating and adopting.

In the intervening time there have been only minor changes to legislation and guidance and as such there are very few changes proposed to this policy. This has been incorporated into the revised policy.

**The proposed timetable for policy implementation is set out below:**

12 <sup>th</sup> September 2024	Draft Policy to Cabinet.
13 <sup>th</sup> September 2024	Consultation period starts
24 <sup>th</sup> September 2024	Residents' Services Select Committee
9 <sup>th</sup> October 2024	Licensing Committee
25 <sup>th</sup> October 2024	Consultation period ends
12 <sup>th</sup> December 2024	Final policy to Cabinet post-consultation
16 <sup>th</sup> January 2025	Statement of Gambling Policy considered and adopted at Full Council, subject to Cabinet recommendation

**Implications on related Council policies**

A role of the Committee is to make recommendations on service changes and improvements to the Cabinet who are responsible for the Council's policy and direction.

The proposed Statement of Gambling Policy is a policy framework document under the Council's Constitution. As such, Cabinet is required to approve them in draft form with a timetable to include a period of formal consultation (minimum 6 weeks), to include the Licensing Committee and the Residents' Services Select Committee. Cabinet will then consider the responses of the consultation before deciding whether or not to recommend them to full Council for adoption.

**RESIDENT BENEFIT**

The regular review and adoption of the Statement of Gambling Policy ensures that the licensing framework are up to date and effective in ensuring a safe and regulated environment for users of licensed premises. It will also ensure that there are methods for robust enforcement and review of problem licensed premises.

**FINANCIAL IMPLICATIONS**

It is important that the Committee considers cost effective proposals that benefit resident taxpayers in relation to this review, which would ultimately be determined by Cabinet as part of the Council's broader budget planning process.

Corporate Finance has reviewed the report and confirms that there are no financial implications associated with the recommendations in this report.

## LEGAL IMPLICATIONS

Legal Services confirm that there are no specific legal implications arising at the current time. Further, more detailed legal advice will be given as necessary once the outcome of the consultation is known.

## BACKGROUND PAPERS

Current Statement of Gambling Policy

<https://www.hillingdon.gov.uk/gambling>

Gambling Commission - Guidance to Licensing Authorities last updated May 2021

<https://www.gamblingcommission.gov.uk/guidance/guidance-to-licensing-authorities>

Gambling Commission – Licence Conditions & Codes of Practice last updated Oct 2020

<https://www.gamblingcommission.gov.uk/licensees-and-businesses/lccp>

Summer 2023 Consultation – proposed changes to LCCP and RTS:

<https://www.gamblingcommission.gov.uk/consultation-response/summer-2023-consultation-proposed-changes-to-lccp-and-rts-consultation>

High Stakes: Gambling Reform for the Digital Age, April 2023

<https://www.gov.uk/government/publications/high-stakes-gambling-reform-for-the-digital-age>

## APPENDICES

- An overview document detailing the proposed changes is attached at **Appendix A**.
- The draft Statement of Gambling Policy attached at **Appendix B**
- Equality Impact Assessment at **Appendix C**

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## Appendix A - Overview of proposed policy changes

### Draft Statement of Gambling Policy

The Council is required by the Gambling Act 2005 to review the Statement of Gambling Policy every three years. The current policy was last formally reviewed in 2022 and therefore requires updating and adopting in 2025.

In the intervening time there have been only minor changes to legislation and as such there are very few changes proposed to this policy.

The current policy works well and acts as a valuable framework for ensuring the principles of the legislation are upheld.

Policy amendments are shown at Appendix B (the draft revised policy) underlined, in bold and strikethrough text.

- Front page – Effective dates amended.
- Para 1.1, Line 4 – amended to improve sentence structure.
- Para 1.1, Line 7 – “empowered” replaced by “authorised”.
- Para 1.1, Line 9 – New sentence after “committed” and “or” replaced with “This includes...”
- Para 1.1, Line 10 – “not complied with” replaced with “breached”.
- Para 1.1, Line 11 – “and the promotion of the Licensing Objectives under the Act” added.
- Para 1.2 – “we” replaced by “the Licensing Authority”.
- Para 1.3 – “We are” replaced with “the Licensing Authority is”.
- Para 1.5 – “us” replaced with “the Licensing Authority”.
- Para 1.6 – “application or” formatted correctly
- Para 1.8 – “decision making” corrected to “decision-making”
- Para 1.9, Line 2 – “Authority” added after “Licensing” and at line 3 “three year” amended to “three-year”
- Para 1.12 – Relevant consultation dates added.
- Para 1.17 – “Council” replaced by “Licensing Authority”.
- Para 1.37 – new section regarding Representations and details what is a ‘relevant’ representation.
- Para 1.39 – “the” added before “Licensing Authority”.
- Para 1.50 – “The Licensing Authority” added.
- Para 1.53 – “Licensing Authority” added.
- Para 1.66 – New “Direct Marketing” section added
- Paras 1.68 & 1.69 – New section to consider Duty to Protect/Martyn’s Law which is due to come into force.
- Para 2.11 – Line 1, “Race Tracks” amended to “racetracks”. Line 8, “off course” amended to “off-course”. Para 2.12 – “Apart” to correct “part”.
- Para 2.23 – Line 4, “under age” amended to “underage”.
- Para 5.2 – “people” amended to “persons including companies”.
- Para 5.3 – New para referring to where fees can be viewed
- Para 5.6 – “Hillingdon Council” replaced by “Licensing Authority”.
- Para 5.8 – “s” added to recommends and paragraph amended to improve sentence structure

- Para 5.9 – “s” added to “premises” and capitals used for “Licensing Authority”
- Para 5.12 – “Council” replaced by “Licensing Authority”.
- Para 5.17 – “Council” replaced by “Licensing Authority”.
- Para 5.42 - New para added to include ‘Think 25’ guidance
- Para 5.45 – “is suspicious” amended to “has concerns”.
- Para 5.49 – New para added to include ‘Think 25’ guidance.
- Para 5.52 - “Council” replaced by “Licensing Authority”.
- Para 5.53 - “Council” replaced by “Licensing Authority” and “the” added before “licensing objectives”.
- Para 5.62 & 5.63 - Capital “L” and capital “A” to amend “licensing authority”.
- Para 5.65 – “18-year olds” added and “Adult Gaming Centre” added to correct.
- Para 5.66– New para added to include ‘Think 25’ guidance
- Para 5.72 - New para added to include ‘Think 25’ guidance
- Paras 5.84 to 5.88, new ‘Appeals’ section added.
- Para 7.1 – “as regards” amended to “regarding”.
- Para 7.6 – “email” amended to “E-mail”.
- Para 9.4 – “the Equality Act 2010 and the Public Sector Equality Duty” added.
- Annex B – updated contacted details for the Responsible Authorities

Page, paragraph numbers and formatting will be updated on the final policy document.



# HILLINGDON

LONDON

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Statement of Gambling Policy  
The Gambling Act 2005

Effective ~~2023-25~~ 2025-2028

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**PART 1  
THE GAMBLING ACT 2005**

**INTRODUCTION**

1.1 The London Borough of Hillingdon Council is the Licensing Authority under the Gambling Act 2005. This means that the Council is responsible for granting Premises Licences in respect of betting premises, bingo premises, casino premises, adult gaming centres and family entertainment centres. The Licensing Authority also as well as issuing a range of gaming permits and other authorisations for gambling within the Borough. As a Licensing Authority, we are also authorised ~~empowered~~ under the Act to impose conditions and review licences, as well as take enforcement action when an offence under the Act has been committed, ~~or~~ This includes when premises or activities are unlicensed, or licence conditions are breached ~~not complied with~~. This is coupled with powers of entry and inspection to ensure compliance and the promotion of the Licensing Objectives under the Act.

**The Licensing Framework**

1.2 In exercising most of our decision-making functions ~~we~~ the Licensing Authority must have regard to the three Licensing Objectives set out in Section 1 of the Gambling Act, namely:

- Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime
- Ensuring that gambling is conducted in a fair and open way
- Protecting children and other vulnerable persons from being harmed or exploited by gambling

1.3 ~~We are~~ The Licensing Authority is also bound by section 153 of the Act, which requires us, in making decisions concerning Premises Licences and Temporary Use Notices, to aim to permit the use of premises for gambling insofar as we think fit, subject to such decisions being:

- In accordance with any relevant code of practice under Section 24 of the Act, the Licence Conditions and Codes of Practice (LCCP)
- In accordance with any relevant guidance issued by the Gambling Commission
- Reasonably consistent with the licensing objectives; and
- In accordance with this Statement of Licensing Principles

1.4 The effect of this duty is that the Licensing Authority must approach our functions in a way that seeks to regulate gambling by using our powers to moderate its impact on the licensing objectives rather than initially starting out to preventing it all together.

## The Policy

- 1.5 Section 349 of the Act requires us the Licensing Authority to publish a *Statement of Principles* (or policy) that we will apply when exercising our various functions under the Act. This Statement of Principles fulfils that statutory requirement and details throughout the document the Council's general approach to the making of licensing decisions.

- 1.6 Nothing in this policy will override the right of any person to make an application under the Act and have that application considered on its individual merits. Equally, nothing in this policy will undermine the right of any person to make representations on an ~~application, or~~ application or seek a review of a licence where there is a legal power to do so.
- 1.7 This document should be read in conjunction with the Act, Regulations made under the Act and Guidance issued by the Gambling Commission. Our Statement of Principles is designed to be a strategic (Gambling) Licensing Policy, not an operational guide to the Gambling Act or a guide to the application process.
- 1.8 This policy is supplemented by guidance documents for residents and the trade on the application and licensing process. These documents will assist applicants and objectors in understanding their rights and responsibilities under the Act in respect of:
- Applying for licenses and other gambling permissions.
  - Making representations.
  - Complaints about a premises licensed under the Act and review rights.
  - Committee hearings and the ~~decision-making~~ decision-making process.
  - The information is available on the Council's website or on request by contacting the Licensing Authority.
- 1.9 The licensing authority's policy will have effect for a maximum of three years and must be reviewed thereafter, but the Licensing Authority may review and alter the Policy at any time during the ~~three year~~ three-year period. Where the Policy is reviewed and changes proposed the licensing authority must consult on any revision.

## CONSULTATION

- 1.10 The Council has, in accordance with the section 349(3) of the Gambling Act, consulted with:
- a. London Borough of Hillingdon Council Licensing Authority
  - b. The Gambling Commission
  - c. The Chief Officer of Police for the London Borough of Hillingdon
  - d. London Fire & Emergency Planning Authority, Hillingdon Fire Station
  - e. London Borough of Hillingdon Council Planning Authority
  - f. Hillingdon Local Safeguarding Board
  - g. HM Revenue and Customs
  - h. Authority for Vulnerable Adults
  - i. A Licensing Authority in whose area the premises are situated (*i.e. the Council itself and also any adjoining Council where premises straddle the boundaries between the two*).
  - j. Persons who appear to this authority to represent the interests of persons carrying on gambling businesses in the borough of Hillingdon and

- neighbouring boroughs
- k. Persons who appear to us to represent the interests of persons who are likely to be affected by the exercise of this authority's functions under the Gambling Act 2005.

1.11 A comprehensive list of the persons and/or bodies we have consulted is attached at Annex A. —A summary of the consultation responses can be found on the Council's website. The full list of comments made and consideration given to those responses is available on request by contacting the Authority's Licensing Service.

1.12 Our consultation took place between 13<sup>2</sup><sup>th</sup> September 2024<sup>3</sup> and 25<sup>4</sup><sup>th</sup> October 2024<sup>2</sup>

## DECLARATION

1.13 In producing the final Statement of Principles, this Licensing Authority declares that it has had regard to the Licensing Objectives, the Gambling Act 2005, the Guidance issued by the Gambling Commission and responses from those consulted on the policy statement.

## AUTHORISED ACTIVITIES

1.14 Gambling' is defined in the Act as either gaming, betting or taking part in a lottery:

- Gaming means playing a game of chance for a prize

- 

- Betting means making or accepting a bet on the outcome of a race, competition, or any other event; the likelihood of anything occurring or not occurring; or whether anything is true or not true

- 

- A Lottery is where persons are required to pay in order to take part in an arrangement, during the course of which one or more prizes are allocated by a process that relies wholly on chance.

1.15 Private gaming in private dwellings and on domestic occasions is exempt from licensing or registration providing that no charge is made for participating; only equal chance gaming takes place; and it does not occur in a place to which the public have access. Domestic betting between inhabitants of the same premises or between employees of the same employer is also exempt.

1.16 Non-commercial gaming and betting (where no parts of the proceeds are for private gain) may be subject to certain exemptions. Further advice should be sought from the Council's Licensing Team where appropriate.

## LICENSING AUTHORITY FUNCTIONS

1.17 Under the Act, the ~~Council~~ Licensing Authority will be responsible for:  
4.17

- Licensing of premises where gambling activities are to take place by issuing premises licences.
- Issuing Provisional Statements.
- Regulating Members' Clubs and Miners' Welfare Institutes who wish to undertake certain gaming activities via issuing club gaming permits and/or club machine permits.
- Issuing Club Machine Permits to commercial clubs.
- Granting permits for the use of certain lower stake gaming machines at unlicensed Family Entertainment Centres.
- Receiving Notifications from Alcohol Licensed premises (under the Licensing Act 2003) of the use of two or less gaming machines.
- Granting licensed premises gaming machine permits for premises licensed to sell/supply alcohol for consumption on the licensed premises, under the Licensing Act 2003, where more than two machines are required.
- Registering Small Society Lotteries below prescribed thresholds.
- Issuing Prize Gaming Permits.
- Receiving and endorsing Temporary Use Notices.
- Receiving Occasional Use Notices.
- Providing information to Gambling Commission regarding details of Licenses issued (see section on Information Exchange).
- Maintaining Register of Licenses and Permits issued under these functions.
- Exercising its powers of enforcement under the Act in partnership with the Gambling Commission and other relevant responsible Authorities.

1.18 It should be noted that licensing authorities are not involved in licensing remote gambling at all, which is regulated by the Gambling Commission via operating licenses.

#### **RESPONSIBLE AUTHORITIES**

1.19 These are generally public bodies that must be notified of all applications and who are entitled to make representations to the Council if they are relevant to the licensing objectives.

1.20 Within the meaning of Section 157 of the Act, those authorities are:

- a) London Borough of Hillingdon Council Licensing Authority.
- b) The Gambling Commission.
- c) The Chief Officer of Police for the London Borough of Hillingdon (where relevant, Chief Officer of Police for Heathrow).
- d) London Fire & Emergency Planning Authority, Hillingdon Fire Station.
- e) London Borough of Hillingdon Council Planning Authority.
- f) London Borough of Hillingdon Council Environmental Protection Unit (*i.e. authority responsible for pollution and harm to human health*).
- g) Hillingdon Local Safeguarding Board.
- h) HM Revenue and Customs.
- i) Authority for Vulnerable Adults.

- j) A Licensing Authority in whose area the premises are situated (*i.e. the Council itself and also any adjoining Council where premises straddle the boundaries between the two*).

For Vessels only:

Section 211(4) of the Act provides that the following are Responsible Authorities in addition to the authorities listed under section 157 of the Act:

- A. The Navigation Authority (*whose statutory functions are in relation to waters where the vessel is usually moored or berthed*)
- B. The Environment Agency,
- C. British Waterways and
- D. The Secretary of State for Digital, Culture, Media and Sport (DDCMS).

- 1.21 Subject to any other person being prescribed in Regulations by the Secretary of State. The contact addresses for these authorities are illustrated at Annex B, or available via the Council's website.

#### **DESIGNATED BODY PROTECTING CHILDREN FROM HARM**

- 1.22 The Council is required by regulations to state the principles it will apply in exercising its powers under Section 157(h) of the Act to designate, in writing, a body which is competent to advise the Licensing Authority about the protection of children from harm.
- 1.23 The principles are that:
- The designated body must be responsible for an area covering the whole of the Licensing Authority's area.
  - The designated body must be answerable to democratically elected persons, rather than any particular vested interest group etc.
- 1.24 In accordance with the Gambling Commission's Guidance for local authorities this authority designates the Local Safeguarding Children Board for this purpose.
- 1.25 The remit of the Board is to co-ordinate and scrutinise arrangements for safeguarding and promoting the welfare of Hillingdon's children. It operates throughout the Borough, is responsible for the area covered by the Licensing Authority and this Policy; and has specialist knowledge and experience in the protection of children to fulfil this role.



## INTERESTED PARTIES

- 1.26 Interested parties can make representations about licence applications, or apply for a review of an existing licence. (see annex A with regard to Councillors making representations). For the purposes of the Gambling Act 2005 interested parties will include persons who:
- Live sufficiently close to premises carrying out gambling activities.
  - Have business interests that might be affected; and
  - Represent persons listed above.
- 1.27 We are required by regulations to state the principles we will apply in exercising our powers under the Gambling Act 2005 to determine whether a person is an interested party. This Licensing Authority's principles are set out in the following paragraphs:
- 1.28 Each case will be decided upon its merits. We will not apply a rigid rule to our decision-making. In the case of doubt, the benefit will be given to the party making the representation until the contrary can be shown.
- 1.29 Interested parties can include trade associations and unions; and residents' or tenants' associations, providing that they can show they represent someone who would be classed as an interested party in their own right. Within the meaning of the Act, interested parties can also be persons who are democratically elected such as Councillors and MPs.
- 1.30 Generally, the principles we will apply when deciding whether or not a person is an interested party will include looking at the size of the premises where larger premises may be considered to affect people over a broader geographical area compared to smaller premises offering similar facilities and the nature of the activities being conducted on the premises. As to the different elements of the definition of "Interested Party", the Licensing Authority will take into account the following specific matters of principle:
- 1.31 **Persons living "Sufficiently Close"**
- The Licensing Authority recognises "sufficiently close to be likely to be affected" could have a different meaning for, for instance, a private resident, a residential school for children with problems and a residential hostel for vulnerable adults and will therefore deal with each representation on its individual merits.
- 1.32 In determining whether someone lives sufficiently close to a particular premises as to likely to be affected by the authorised activities the Council may take account of the:

- Size of the premises.

- Nature of the premises.
- Nature of the authorised activities being proposed.
- Distance of the premises from the person making the representation.
- Characteristics of the complainant.
- Potential impact of the premises.

### 1.33 Persons with business interests likely to be affected

With regard to those persons with business interests that could be affected, the Licensing Authority will (in addition to the factors set out in paragraph 1.38 above) need to be satisfied that the relevant business is indeed likely to be affected and the following factors will therefore be taken into account:

- The 'catchment' area of the premises (i.e. how far people travel to visit);
- Whether the person making the representation has business interests in that catchment area that might be affected.
- Whether or not the representation is purely based on 'competition' as the Licensing Authority does not consider this to be a relevant representation.

### 1.34 Persons/bodies representing persons named above

With regard to persons representing persons living sufficiently close and persons having business interests that may be affected, the Licensing Authority will include trade associations and unions.

1.35 Where a Councillor represents an interested party, in order to avoid conflict of interest, the Councillor cannot be part of the Licensing Committee dealing with the licence application. When in doubt, Councillors are asked to contact the Council's Legal Services to gain further advice.

1.36 Other than Councillors and MPs, this authority will require written evidence that a person represents someone who either lives sufficiently close to the premises to be likely to be affected by the authorised activities and/or business interests that might be likewise affected. A letter from one of these persons confirming their wish to be represented will be sufficient.

### Representations

**1.37 'Interested Parties' and 'Responsible Authorities' may make comments to an application in the form of a Representation. Representations must be 'relevant' and should therefore include one or more of the following:**

- relate to the licensing objectives
- relate to this gambling policy
- relate to Gambling Commission's Guidance
- relate to the Gambling Commission's Codes of Practice
- relate to the premises concerning that application
- are not frivolous nor vexatious

## Exchange of Information

4.371.38 Under the Gambling Act, we will have a key role in providing information to the Gambling Commission to assist it in carrying out its functions. This Licensing Authority recognises the need to work closely with the Gambling Commission in exchanging information as and when required.

4.381.39 As ~~the~~ Licensing Authority we are required to include in our policy statement the principles we intend to apply in exercising the functions under sections 29 and 30 of the Act with respect to the exchange of information between us and the Gambling Commission, and the functions under section 350 of the Act with

respect to the exchange of information between us and the other persons listed in Schedule 6 to the Act.

### **Statement of Principles**

4.391.40 This Licensing Authority will act in accordance with the provisions of the Gambling Act 2005 in its exchange of information which includes the provision that the General Data Protection Regulations 2018 will not be contravened. The Licensing Authority will also have regard to any Guidance issued by the Gambling Commission to Local Authorities on this matter, as well as any relevant regulations issued by the Secretary of State under the powers provided in the Gambling Act 2005.

4.401.41 Details of applications and representations which are referred to a Licensing Sub-Committee for determination will be published in reports that are made publicly available in accordance with the Local Government Act 1972 and the Freedom of Information Act 2000. Personal details of people making representations will be disclosed to applicants and only be withheld from publication on the grounds of personal safety where the Licensing Authority is asked to do so.

4.441.42 The Licensing Authority will normally share the information it holds about licensed premises with the Gambling Commission, Local Police Enforcement in Hillingdon; and with other Responsible Authorities where there is a need for exchange of information on specific premises.

4.421.43 We are aware that the Gambling Commission recommends in its Guidance to Local Authorities that a Protocol for the sharing of such information should be established between, us, the Licensing Authority, the Gambling Commission itself and relevant Responsible Authorities in order to target agreed problem and high risk premises that require greater attention while providing a lighter touch in respect of well-run, low risk premises.

### **Partnership Working**

4.431.44 The local authority shall work in partnership with the Gambling Commission to regulate gambling. In doing so the Commission will tend to focus on operators and issues of national or regional significance whilst the Licensing Authority will take the lead on regulating gambling locally.

4.441.45 The Commission and licensing authorities may work directly together on particular issues. By working in collaboration jointly we are able to prevent such risks growing into a more widespread problem and to ensure that both the Commission and Licensing Authority resources are used efficiently.

4.451.46 Licensing authorities should aim to work with local businesses to reduce the risk to the licensing objectives to acceptable levels. The Act does not envisage regulation by either the Commission or licensing authorities being aimed at preventing legitimate gambling.

### Enforcement

4.461.47 Licensing authorities are required by regulation under the Gambling Act 2005 to state the principles to be applied by the authority in exercising the functions under Part 15 of the Act with respect to the inspection of premises; and the powers under section 346 of the Act to institute criminal proceedings in respect of the offences specified.

4.471.48 This Licensing Authority's principles are that:

- It will be guided by the Gambling Commission's Guidance for local authorities and it will endeavour to be:
  - **Proportionate**: we will only intervene when necessary, remedies will be appropriate to the risk posed, and costs identified and minimised.
  - **Accountable**, with decisions being justifiable, and be subject to public scrutiny.
  - **Consistent**: rules and standards will be joined up and implemented fairly.
  - **Transparent and Open**: Licence conditions will be kept simple and user friendly.
  - **Targeted**: Regulation will be focused on the problem, and minimise side effects.
- The Council will avoid duplication with other regulatory regimes so far as possible.
- This licensing authority will also keep itself informed of developments as regards the work of the Better Regulation Executive in its consideration of the regulatory functions of local authorities. Furthermore, the licensing authority will take into account any guidance issued by the Better Regulation Executive.
- We note the Gambling Commission's guidance that: in order to ensure compliance with the law, this Licensing Authority must prepare a Risk-based Inspection Programme and that we carry out regular 'routine'

day time programmed inspections, based on risk assessment in the categories High, Medium and Low; and that we also carry out 'non routine' evening programmed inspections. Where one-off events are taking place under a Temporary Use Notice or Occasional Use Notice, the Licensing Authority may also carry out inspections to ensure the Licensing Objectives are being promoted.



- High-risk premises are those premises that require greater attention with low-risk premises needing only a lighter touch so that resources are effectively concentrated on problem premises.

4.481.49 Enforcement may include test purchasing activities to measure compliance of licensed operators with aspects of the Gambling Act. When undertaking test purchase activities, this licensing authority will undertake to liaise with the Gambling Commission and the operator to determine what other, if any, test purchasing schemes may already be in place. Irrespective of the actions of an operator on their overall estate, test purchasing may be deemed an appropriate course of action.

4.491.50 **The Licensing Authority** -should consult with operators in the first instance where they have concerns about the underage access and age verification policies or whose -they plan to test purchase. This will enable the Licensing Authority to identify what programmes are in place to manage the business risk and take these into account in planning a test purchase exercise.

4.501.51 The Licensing Authority should consult with the Gambling Commission before undertaking any test purchasing operations. This is to ensure that there is no conflict between any ongoing investigation or enforcement activity related to either the premises or the operator. Furthermore, the Licensing Authority shall share any test purchasing results with the Gambling Commission.

4.541.52 The main enforcement and compliance role for this licensing authority in terms of the Gambling Act 2005 will be to ensure compliance with the Premises Licences and other permissions which is authorises.

4.521.53 Authorised persons of the licensing authority exercise their inspection powers in accordance with the Act, the guidance and the principles set out in the **L**icensing **A**uthority's policy.

4.531.54 Any -enforcement action taken in relation to the duties of this Licensing Authority under the Gambling Act 2005 will comply with the London Borough of Hillingdon Council's current 'Prosecutions and Sanctions Policy'

4.541.55 Enforcement Officers will also comply with 'The Code for Crown Prosecutors

published by the Crown Prosecution Service which can be accessed at:

~~4.55~~ <https://www.cps.gov.uk/publication/code-crown-prosecutors>

~~4.56~~

~~4.57~~~~1.56~~ The Gambling Commission will be the enforcement body for the Operator and Personal Licences. Concerns about manufacture, supply or repair of gaming machines will not be dealt with by the licensing authority but will be notified to the Gambling Commission. This authority also understands that the Gambling Commission will be responsible for compliance as regards unlicensed premises.

~~4.58~~~~1.57~~ In considering enforcement action, the Licensing Authority will bear in mind the Human Rights Act 1998, in particular:

- i) Article 1 of the First Protocol: that every person is entitled to the peaceful enjoyment of his or her possessions, including for example the possession of a licence.
- ii) Article 6: that in the determination of civil rights and obligations everyone is entitled to a fair hearing within a reasonable time by an independent and impartial tribunal established by law.
- iii) Article 8: that everyone has the right to respect for his or her home and private family life.
- iv) Article 10: that everyone has the right to freedom of expression within the law.

#### ↵ **Equality Duty**

~~4.59~~

~~4.60~~~~1.58~~ The Licensing Authority have a public sector equality duty to the following protected characteristics:

- Age
- Disability
- Sex, gender reassignment, sexual orientation
- Pregnancy and maternity
- Race, religion or belief
- Marriage and civil partnership

~~4.61~~

~~4.62~~~~1.59~~ Under s.149 of the Equality Act 2010 a Public Authority must in the exercise of its function have due regard to the need to:-

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the 2010 Act
- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it

~~4.63~~~~1.60~~ The Licensing Authority has considered the Equality and Diversity issues that may arise from the Policy. The Licensing Authority considers that this policy does not raise any concerns with regard to equality and diversity



## Modern Day Slavery

~~4.64~~

1.61 The Licensing Authority acknowledges the implementation of the Modern Day Slavery Act 2015 and will therefore fully take on their responsibilities and statutory duties under the Act.

1.62 This Licensing Authority recognises the role it can play in proactively preventing modern slavery, which includes consideration of:-

- Identification and referral of victims during inspections and visits
- Reporting and referring for investigation via the National Crime Agency's national referral mechanism any of its licence holders or managers of premises as a cause for concern
- Assisting partners with Community safety services and disruption activities.

### • Primary Authority

1.65—The Primary Authority (PA) scheme, administered by the Office for Product Safety and Standards provides for a statutory partnership to be formed between a business and a single authority. That single authority, the PA, can provide a national inspection strategy within which other local regulators can operate (Primary Authority statutory guidance), to improve the effectiveness of visits by local regulators and enable better sharing of information between them. The PA scheme therefore aims to ensure that local regulation is consistent at the national level.

1.63

1.66—Since October 2013, the PA scheme has been extended to include age-restricted sales of gambling in England and Wales. It does not apply to any other aspect of the Act. This means that the Licensing Authority must follow any age restricted sales of gambling national inspection plans and strategies that are published on the PA register when considering proactive age restricted sales (gambling) activity including testing.

1.64

## Advertising

~~4.67~~1.65 The Act permits the advertising of gambling in all forms, provided that it is legal and there are adequate protections in place to prevent such advertisements undermining the licensing objectives. The Advertising Standards Authority (ASA) is the UK's independent regulator of advertising. It enforces the UK Advertising Codes (the Codes), written by the Committees of Advertising Practice. The Codes cover the content and placement of advertising and are designed to ensure that advertisements for gambling products are socially responsible, with particular regard to the need to protect children, young persons under 18 and other vulnerable persons from being harmed or exploited. The Codes also require that advertisements for gambling products or services do not mislead. Any complaint about the content and placement of advertising or marketing communications

should be sent directly to the ASA.

#### 4.68 Direct Marketing

4.69

4.70 1.66 Gambling premises are required to provide customers with options to opt-in to direct marketing based on the product types (for example betting, bingo and casino) they are interested in and the channels (for example email, SMS) through which they wish to receive marketing.

#### **Human Rights**

4.71

4.72 1.67 When considering applications and taking enforcement action, the Licensing Authority will be subject of the Human Rights Act 1998 and should bear in mind

- Article 1 – peaceful enjoyment of possessions.
- Article 6 – right to a fair hearing
- Article 8 – respect for private and family life
- Article 10 – right to freedom of expression

#### Counter- Terrorism

1.68 Applicants for gambling premises are encouraged to consider:

- Undertaking a terrorism threat risk assessment to ensure that any security related concerns are identified and, appropriate reasonable and proportionate steps are taken to reduce any risks from a terrorist attack, and
- Undertaking an ACT security plan, including completion of a preparedness plan, information sharing and training.

1.69 More relevant information and advice regarding counter terrorism measures can be found on the Protect UK Website:

[www.protectuk.police.uk](http://www.protectuk.police.uk)

**PART 2  
PROMOTING THE LICENSING OBJECTIVES**

- 2.1 In exercising its functions under the Gambling Act 2005, London Borough of Hillingdon Council will have regard to the three statutory licensing objectives, which are:
- (i) Preventing gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime.
  - (ii) Ensuring that gambling is conducted in a fair and open way.
  - (iii) Protecting children and other vulnerable persons from being harmed or exploited by gambling.
- 2.2 In promoting these objectives, the Council has considered the Gambling Commission's Guidance to Local Authorities and makes the following observations as to the principles it intends to apply when considering the three objectives:

**PREVENTING GAMBLING FROM BEING A SOURCE OF CRIME OR DISORDER, BEING ASSOCIATED WITH CRIME OR DISORDER OR BEING USED TO SUPPORT CRIME.**

- 2.3 The Gambling Commission will play a leading role in preventing gambling from being a source of crime and will maintain rigorous licensing procedures that aim to prevent criminals from providing facilities for gambling.
- 2.4 Anyone applying to the Council for a Premises Licence will have to hold an Operating Licence from the Gambling Commission before a licence can be issued. Therefore, the Council will not generally be concerned with the suitability of an applicant. However, if during the course of considering a Premises Licence application or at any other time, the Licensing Authority receives such information that causes it to question the suitability of the applicant; those concerns will be brought to the immediate attention of the Gambling Commission.
- 2.5 If an application for a licence or permit is received in relation to premises which are in an area noted for particular problems with organised crime or crime directly associated with gambling premises, the Council will, in consultation with the Police and other relevant Responsible Authorities, consider whether specific controls need to be applied to prevent those premises from being a source of crime. In appropriate circumstances, the Licensing Authority may consider appropriate conditions to be attached to the Licence, such as Door Supervisors.
- 2.6 Issues of disorder should only be dealt with under the Act if the disorder amounts to a form of activity, which is more serious and disruptive than mere nuisance and it can be shown that gambling is the source of that disorder. A disturbance

might be serious enough to constitute disorder if police or ambulance assistance was required to deal with it. Another factor which could be taken into account is how threatening the behaviour was to those who could see or hear it, and whether those people live sufficiently close to be affected or have business interests that might be affected.

- 2.7 The Licensing Authority recognises that disorder may be focused on premises and therefore recommends an applicant takes such controls as necessary to prevent such disorder and nuisance. Examples may include thought given to the way that gambling is conducted on the premises, sighting of large payout machines, levels of noise from public address systems that should ideally be sited at the back of the premises away from residential areas.
- 2.8 Where there are persistent levels of disorder, the Licensing Authority will liaise closely with the Gambling Commission to consider the suitability of the applicant as an operator. In addition, the Licensing Authority will strive to have a good working relationship with the Police in accordance with any protocol that is currently in place.

#### **ENSURING THAT GAMBLING IS CONDUCTED IN A FAIR AND OPEN WAY**

- 2.9 All gambling should be fair in the way it is played with transparent rules such that players know what to expect. Examples may include easily understandable information being made available on the rules and probability of winning/losing, ensuring the rules are fair and that advertising is not misleading. Further recommendations would be to ensure that the results of competitions/events are made public; and that machines, equipment and software meet the required standards set by the Gambling Commission.
- 2.10 Generally, it is for the Gambling Commission to ensure this Licensing Objective is complied with through the Operating and Personal Licence regime covering the management of a gambling business and the suitability and actions of an individual.
- 2.11 However, with regard to [Race Tracks](#)~~racetracks~~, where Betting Track Operators do not need an Operator's Licence from the Gambling Commission, the role of the Licensing Authority is more significant. The Licensing Authority, in certain circumstances, may seek to impose conditions to ensure that the environment in which betting takes place is suitable. The Licensing Authority may wish to know the nature of the venue, have sight of a plan of the track which would include access to the tent where gambling is to take place, where the operators will conduct on course betting and whether or not there are any ~~off-course~~[off-course](#) betting operators.

## **PROTECTING CHILDREN AND OTHER VULNERABLE PERSONS FROM BEING HARMED OR EXPLOITED BY GAMBLING**

- 2.12 Apart from one or two limited exceptions, the intention of the Act is that children and young persons should not be allowed to gamble and should therefore be prevented from entering gambling premises which are 'adult-only' environments.
- 2.13 This Authority notes and endorses the Gambling Commission statement that: "The requirement in relation to children is explicitly to protect them from being harmed or exploited by gambling".
- 2.14 In practice, steps will generally be taken to prevent children from taking part in, or being in close proximity to, gambling, where they are not legally permitted to do so, especially with regard to premises situated in areas where there may be a high rate of reported truancy. There may also be restrictions on advertising so that gambling products are not aimed at children or advertised in such a way that makes them particularly attractive to children. The advertising of Gambling services is regulated by the Gambling Commission under the Gambling (Licensing and Advertising) Act 2014. In relation to casinos only, the Gambling Commission will be issuing a code of practice about access to casino premises for children and young persons.
- 2.15 When considering whether to grant a premises licence or permit the Council will consider whether any measures are necessary to protect children or vulnerable young persons from being harmed or exploited by gambling, such as the supervision of entrances, the segregation of gambling from areas frequented by children and the supervision of gaming machines in non-adult gambling specific premises, such as pubs, clubs, betting tracks etc. These measures will be particularly relevant on mixed use premises, tracks where children have freedom of movement in betting areas on race days and in particular to the non-gambling areas of casinos. Other such measures may include appropriate signage, location of machines and numbers of staff on duty.
- 2.16 Whilst the Gambling Act does not prohibit vulnerable groups in the same manner as children and young persons, with regard to vulnerable people, the Licensing Authority will consider whether or not any measures have been taken to protect such a group. Any such considerations will be balanced against the Licensing Authority's aim to permit the use of premises for gambling; each application will be treated on its own merit. The term "vulnerable persons" has not been defined under the Act, but in seeking to protect vulnerable people the Council will consider that "vulnerable persons" include (but not limited to):
- (i) People who gamble more than they want to.
  - (ii) People who gamble beyond their means, and
  - (iii) People who may not be able to make informed or balanced decisions about gambling, perhaps due to a mental impairment, alcohol or drugs.

2.17 Gambling operators will be expected to demonstrate that they have adequate training and staffing procedures in place to ensure that vulnerable persons are

protected from gambling related harm. Staff working at gambling premises will also need to be aware of challenges present in the local area and vicinity of the licensed premises which may impact on the protection of children and vulnerable persons.

- 2.18 Children (defined in the Act as under 16s) and young persons (16-17s) may take part in private and non-commercial betting and gaming but the Act contains a number of restrictions on the circumstances in which they may participate in gambling or be on premises where gambling is taking place. An adult is defined as 18 and over. In summary:
- i) Betting Shops cannot admit anyone under the age of 18.
  - ii) Bingo Clubs may admit those under the age of 18 but must have policies to ensure they do not gamble, except on category D machines.
  - iii) Adult Entertainment Centres cannot admit those under the age of 18.
  - iv) Family Entertainment Centres and premises with an alcohol premises licence such as pubs) can admit under-18s, but they may not play category C machines which are restricted to those over the age of 18.
  - v) Clubs with a Club Premises Certificate can admit under-18s, but they must have policies to ensure those under the age of 18 do not play machines other than category D machines.
  - vi) Tracks will be required to have policies to ensure that under 18s do not participate in gambling other than on category D machines.
- 2.19 With this Licensing Objective in mind, the Licensing Authority will take particular care when considering applications for more than one licence for a building and those relating to a discrete part of a building used for other non-gambling purposes, such as shopping malls or airport terminals. Where relevant, applicants will be expected to take measures to ensure young persons, and children are not in close proximity to gambling. Such measures could include sighting machines at the back of a premises so as to ensure young children do not have sight of such machines, not advertising gambling so as to encourage children and ensuring there is no accidental access to observe or enter premises used for gambling.
- 2.20 The Licensing Authority recommends that measures are taken to ensure entrances and exits from parts of a building covered by one or more licences are separate and identifiable so that people do not drift into a gambling area in error. Such measures could include appropriate signage, physically separating Family Entertainment Centres and Adult Gaming Centres, and supervision of entrances.
- 2.21 The Licensing Authority will pay particular attention to applications where access to the licensed premises is through another premises and will consider whether or not children can gain access; the compatibility of the two establishments and its ability to comply with the requirements of the Gambling Act. The Licensing Authority will also consider whether the co-location of the licensed premises with

other facilities will create an arrangement that is likely to be prohibited under the Act.

- 2.22 The Licensing Authority will consider multiple licences carefully and applicants are recommended to configure these buildings carefully if they seek to develop multipurpose developments and in particular consider how they will protect children from being harmed by gambling as well as preventing children from being in close proximity to gambling. Applicants are also requested to consider entrances and exits from parts of the building covered by one or more licences. These exits and entrances should be separate and identifiable to ensure children do not 'drift' into a gambling area.
- 2.23 The Licensing Authority recommends that all staff are suitably trained and aware of the Gambling laws, social responsibility and statutory requirements related to age restrictions on gaming machines. Appropriate measures should be taken to prevent ~~under-age~~underage use of such machines, including clear and appropriate signage, an approved Proof of Age scheme, a requirement for staff to be vigilant and aware at all times and ensuring the Adult Gaming area is not visible from the street.
- 2.24 The Council will always treat each case on its own individual merits and when considering whether specific measures are required to protect children and other vulnerable people it will balance its considerations against the overall principle of aiming to permit the use of premises for gambling.
- 2.25 When determining the location of proposed gambling facilities, this Licensing Authority in appropriate circumstances, will have regard to any Local Risk Assessment detailed in this policy and will consider very carefully the following factors when considering applications for Premises Licences, permits and other permissions:
- i) Proximity of premises to local schools.
  - ii) Proximity of premises to centres that pose a high risk to vulnerable and young persons.
  - iii) Proximity of premises to residential areas where there is a high concentration of children and young people.



**PART 3**  
**INTEGRATING STRATEGIES AND OTHER REGULATORY REGIMES**

**INTEGRATING STRATEGIES**

- 3.1 The Council considers that the Licensing Statement of Principles should provide clear indications of how we, as Licensing Authority, will secure the proper integration of this policy with local crime prevention, planning, transport, tourism, equalities and diversity schemes together with other Council plans introduced for the management of town centres and the night-time leisure economy. Many of these strategies are not directly related to the promotion of the three licensing objectives, but indirectly impact upon them. Coordination and integration of such policies, strategies and initiatives, so far as is possible and consistent with the licensing objectives, is therefore important to us. We will liaise with the relevant authorities or its directorates with regard to this and in doing so adopt a multi-disciplinary approach to ensure proper integration of local and national strategies to promote the licensing objectives, including making arrangements for the Council's Licensing Committee to receive reports from time to time on the:
- i) Needs of the local tourist economy;
  - ii) Cultural strategy for the area;
  - iii) Employment situation in the area and the need for new investment and employment where appropriate;
  - iv) Local Crime Prevention Strategies;
  - v) Race Equality Schemes;
  - vi) Enforcement Policy.
- 3.2 Reports to the Licensing Committee from other relevant departments should enable the various agencies or departments with their own strategies, aims and objectives to keep the Licensing Committee aware of the wider picture in pursuance of the licensing objectives. It is our intention that we will, through the Council's Licensing Committee, monitor how the matters above set out impact on the licensing of gambling activities and facilities and other functions in order to achieve seamless integration of our licensing function with other relevant strategies and initiatives.
- 3.3 In order to avoid duplication with other statutory regimes, the Licensing Authority will not attach conditions to a licence unless they are considered necessary for the promotion of the licensing objectives. Conditions will generally be considered unnecessary if they are already adequately covered by other legislation.
- 3.4 Similarly, where other legislation confers powers on inspection and enforcement agencies in relation to separate activities and concerns relating to licensed premises, this policy does not affect the continued use of such powers by the relevant agency.

- 3.5 This authority will seek to avoid any duplication with other statutory or regulatory systems where possible, including the statutory planning regime.
- 3.6 We emphasise that under section 210 of the Act this Licensing Authority is not entitled to have regard to whether or not a proposal by the applicant is likely to be permitted in accordance with the law relating to planning or building control.
- 3.7 The Planning Department are a Responsible Authority under this Act and have the opportunity to make representations should they desire so to do. The Licensing Authority will therefore consider relevant representations from the local planning authority about the effect of the grant of a premises licence on an extant planning permission where this relates to the licensing objectives, a Commission code of practice, or this Statement of Policy. This authority will also listen to, and consider carefully, any concerns about conditions that cannot be met by licensees due to planning restrictions, should such a situation arise. Otherwise, the two regimes will be treated as completely separate.

## PART 4

### LOCAL RISK ASSESSMENTS AND LOCAL AREA PROFILE

#### Local Risk Assessments

- 4.1 The Gambling Commission's Licence Conditions and Code of Practice (LCCP) which were revised and published in October 2020 formalised the need for operators to consider local risks.
- 4.2 Social Responsibility (SR) code 10.1.1 requires licensees to assess the local risks to the licensing objectives posed by the provision of gambling facilities at each of their premises, and to have policies, procedures and control measures to mitigate the risks. In undertaking the risk assessments, they must take into account the relevant matters identified in this policy statement.
- 4.3 Licensees are required to undertake a local risk assessment when applying for a new premises licence. Their risk assessment must also be updated:
- 4.3
- When applying for the variation of a premises licence.
  - To take account of significant changes in local circumstances, including those identified in this policy statement.
  - Where there are significant changes licensee's premises that may affect their mitigation of local risks.
- 4.4 The SR provision is supplemented by an ordinary code provision that requires licensees to share their risk assessment with the licensing authority when applying for a premises licence or applying for a variation to existing licensed premises, or otherwise at the request of the licensing authority.
- 4.5 Where concerns do exist, perhaps prompted by new or existing risks, the licensing authority will request that the licensee share a copy of its own risk assessment which will set out the measures the licensee has in place to address specific concerns. This practice should reduce occasions on which a premises review and the imposition of licence conditions are required.
- 4.6 Where this policy statement sets out its approach to regulation with clear reference to local risks, the licensing authority will facilitate operators being able to better understand the local environment and therefore proactively mitigate risks to the licensing objectives. In some circumstances, it might be appropriate to offer the licensee the opportunity to volunteer specific conditions that could be attached to the premises licence.

## **Local Area Profile**

- 4.7 The licensing authority can complete their own assessment of the local environment as a means of '-mapping out' local areas of concern, which will be reviewed and updated to reflect changes to the local landscape. Such an assessment is known as the local area profile. There is no statutory duty on the licensing authority to complete a local area profile; however benefits for both the licensing authority and operators would be in having a better awareness of the local area and risks. Importantly, risk in this context includes potential and actual risk, thereby taking into account possible future emerging risks, rather than reflecting current risks only.
- 4.8 There is no mandatory requirement to have a local area profile and the licensing authority will, where appropriate, engage with responsible authorities ensure any new or variation application assessed taking the local area profile and any risks into account.

## PART 5 PREMISES LICENCES

### GENERAL PRINCIPLES

5.1 Premises Licences authorise the provision of gambling facilities on the following:

- i) Casino Premises.
- ii) Bingo Premises.
- iii) Betting Premises, including race tracks used by betting intermediaries
- iv) Adult Gaming Centres.
- v) Family Entertainment Centres.

5.2 Except in the case of Tracks (where the occupier may not be the person offering gambling), Premises Licences will only be issued to ~~people~~ **persons, including limited companies** with the relevant Operating Licences.

5.3 **The Gambling premises fees are set out in The Gambling (Premises Licence Fees) (England and Wales) Regulations 2007 and can be viewed at:**

**[www.hillingdon.gov.uk/gambling](http://www.hillingdon.gov.uk/gambling)**.

~~5.25.4~~ Premises Licences will be subject to the permissions/restrictions set out in the Gambling Act 2005 and regulations, as well as specific mandatory and default conditions which will be detailed in Regulations issues by the Secretary of state.

~~5.3~~

~~5.45.5~~ We as the Licensing Authority will be able to exclude default conditions and also attach other conditions, where we believe it to be appropriate.

~~5.55.6~~ Under the Act, ~~the Licensing Authority Hillingdon Council~~ has no discretion to grant Premises Licences in circumstances where that would mean departing from the Gambling Commission Guidance and Codes of Practice and this Licensing Authority's own Statement of Licensing Principles. Therefore, our primary focus shall be to aim to permit the use of premises for gambling in so far as we think it is:

- i) In accordance with the 'Licence Conditions and Codes of Practice', issued by the Gambling Commission.
- ii) In accordance with the 'Guidnce to Licensing Authorities', ~~with the 'Guidance to Licensing Authorities'~~, issued by the Gambling Commission.
- iii) Consistent with the Licensing Objectives.
- iv) In accordance with this Statement of Licensing Principles.

~~5.65.7~~ The Council appreciates that gambling can be an emotive subject but acknowledges and endorses the Gambling Commission Guidance that "moral objections to gambling are not a valid reason to reject applications for premises

licences “(except as regards any “no casino resolution”) and also that unmet demand is not a criterion for a Licensing Authority.

~~5.75.8~~ We recognise that the responsibility for an individual's gambling is his or her own and that the responsibility to exercise a duty of care lies with the site operator. However, the Licensing Authority recommends applicants for Adult Gaming and Family Entertainment Centres consider adopting relevant guidance published by the British Amusement Catering Trade Association (BACTA)

### Definition of Premises

~~5.85.9~~ The Council will act in accordance with the gambling commission guidance on ensuring the primary activity of the licensed premises. Gaming machines may be available in licensed betting premises only at times when there are also sufficient facilities or betting operators. They will also need to demonstrate that betting will continue to be the primary activity of a premises when seeking variations to licences.

In making this determination, the Licensing Authority will have regard to the six indicators on betting as a primary gambling activity:

- The offer of established core product (including live events pictures and its range).
- The provision of information on products and events.
- The promotion of gambling opportunities and products.
- The actual use made of inspecting facilities.
- The size of premises.
- The delivery of betting facilities.

~~5.95.10~~ Premises are defined in the Act as “any place”. Different premises licences cannot apply in respect of a single premise at different times. It is however possible for a single building to be subject to more than one premises licence, providing that each licence is for a different part of the building and such different parts can reasonably be regarded as different premises.

~~5.11~~ The Council Licensing Authority will judge each case on its individual merits to decide as a matter of fact, whether different parts of a building can be properly regarded as being separate premises.

~~5.10~~—[In addition to](#)

5.12 ~~In addition to~~ other relevant factors, the Licensing Authority Council will have regard to the Gambling Commission guidance which lists the following factors which may be taken into account:

- Do the premises have a separate registration for business rates?
- Is the premises' neighbouring premises owned by the same person or someone else?
- Can each of the premises be accessed from the street or public passageway?
- Can the premises only be accessed from another gambling premises?

~~5.14~~5.13 We note that the Gambling Commission, in their guidance, do not consider that areas of a building that are artificially or temporarily separate can be properly regarded as different premises. We support this view.

~~5.15~~5.14 This licensing authority takes particular note of the Gambling Commission's Guidance for Local Authorities, which states that:

- i) Licensing Authorities should take particular care in considering applications for multiple licences for a building and those relating to a discrete part of a building used for other (non-gambling) purposes. In particular, they should be aware that entrances and exits from parts of a building covered by one or more licences should be separate and identifiable so that the separation of different premises is not compromised and that people do not 'drift' into a gambling area.
- ii) Licensing authorities should pay particular attention to applications where access to the licensed premises is through other premises (which themselves may be licensed or unlicensed). Clearly there will be specific issues that authorities should consider before granting such applications, for example, whether children can gain access; compatibility of the two establishments; and the ability to comply with the requirements of the Act. But in ~~addition~~addition, an overriding consideration should be whether, taken as a whole, the co-location of the licensed premises with other facilities has the effect of creating an arrangement that otherwise would, or should, be prohibited under the Act.

### Provisional Statement

5.15 Under the Act an applicant may apply for a Provisional Statement where a premises is under construction. The Gambling Commission has advised that reference to the term, "the premises" are to the premises in which gambling may now take place. Therefore, a licence to use premises for gambling will only be issued in relation to premises that are ready to be used for gambling **or are intended to be used for gambling.**

5.135.16 It is a question of fact and degree whether premises are finished to a degree that they can be considered for a premises licence. The Gambling Commission emphasises that requiring the building to be complete ensures that the Licensing Authority can, if necessary, inspect it fully, as can other responsible authorities, with inspection rights under the Act.

5.145.17 In deciding whether a premises licence can be granted where there are construction works, at existing premises, the Licensing Authority Council will determine applications on their merits, applying a two-stage consideration process:

- First, whether the premises ought to be permitted to be used for gambling.
- Second, whether appropriate conditions can be put in place to cater for that situation.

5.155.18 Applicants should note that the Council is entitled to decide that it is appropriate to grant a licence subject to conditions, but it is not obliged to grant such a licence.

#### **Location**

5.165.19 The Gambling Commission Guidance stipulates that demand issues cannot be considered in relation to the location of premises but that considerations made in terms of the licensing objectives can.

5.175.20 In accordance with the Gambling Commission's Guidance for Local Authorities, this Licensing Authority will pay particular attention to the protection of children and vulnerable persons from being harmed or exploited by gambling, as well as issues of crime and disorder.

5.185.21 This authority has not adopted any specific policy in relation to areas where gambling premises should not be located. Should any such policy be decided upon, this policy statement will be updated accordingly. It should be noted that any such future policy will not preclude any application being made with the onus upon the applicant showing how any potential concerns can be overcome.

5.195.22 Each case will be decided on its merits and will depend, to a large extent, on the type of gambling that it is proposed will be offered on the premises.

5.205.23 If an applicant can demonstrate appropriate measures to overcome concerns, that will be taken into account by the Council.



## Conditions

~~5.24~~5.24 Any conditions attached to licences will be proportionate and will be:

- i) Relevant to the need to make the proposed building suitable as a gambling facility.
- ii) Directly related to the premises and the type of licence applied for;
- iii) Fairly and reasonably related to the scale and type of premises: and
- iv) Reasonable in all other respects.

5.28 Decisions upon individual conditions will be made on a case-by-case basis, although there will be a number of control measures this licensing authority will consider utilising should there be a perceived need, such as the use of door supervisors, supervision of adult gaming machines, appropriate signage for adult-only areas etc. There are specific comments made in this regard under each of the licence types below.

5.29 This policy acknowledges that there are conditions that the licensing authority cannot attach to premises licences:

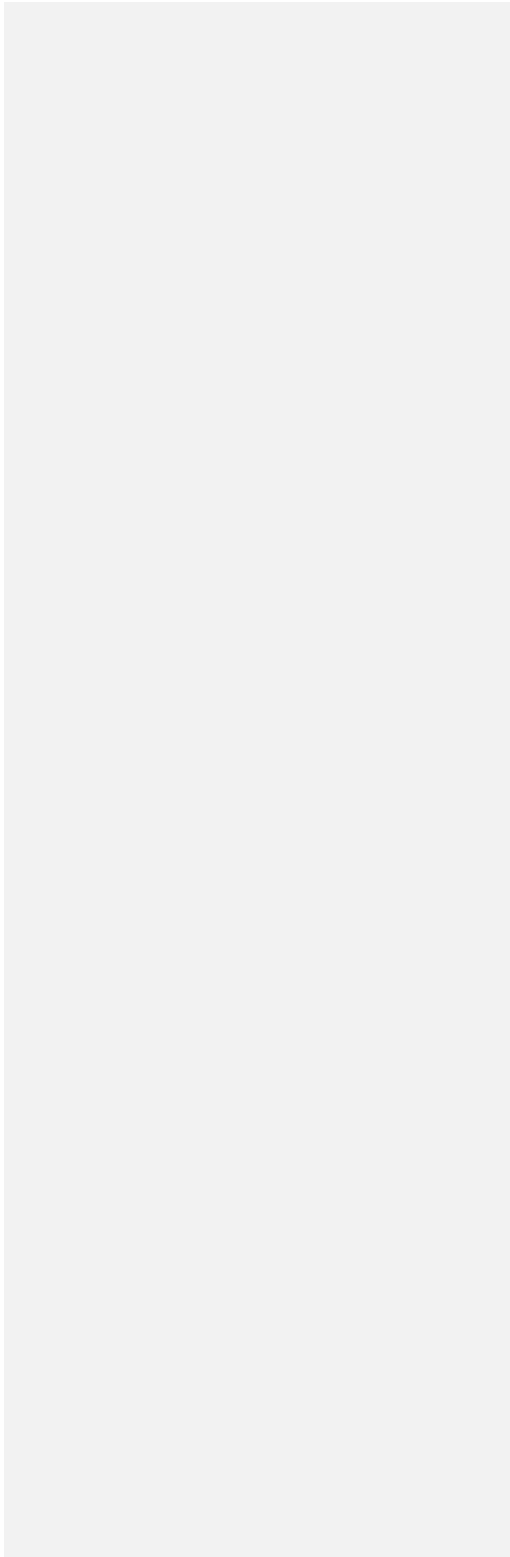
- i) Any condition on the premises licence which makes it impossible to comply with an operating licence condition.
- ii) Conditions relating to gaming machine categories, numbers, or method of operation.
- iii) Conditions which provide that membership of a club or body be required (the Gambling Act 2005 specifically removes the membership requirement for casino and bingo clubs and this provision prevents it being reinstated).
- iv) Conditions in relation to stakes, fees, winning or prizes.

## Door Supervisors

5.30 The Gambling Commission advises in its Guidance for local authorities that Licensing Authorities may consider whether there is a need for door supervisors in terms of the licensing objectives of protection of children and vulnerable persons from being harmed or exploited by gambling, and also in terms of preventing premises becoming a source of crime.

5.31 This policy recognises that door supervisors at bingo or casino premises cannot be licensed by the Security Industry Authority (SIA). This Licensing Authority does not have specific requirements for door supervisors working at bingo or casino premises. Each case will be determined on its individual merits.

5.32 It is noted that for premises other than casinos and bingo premises, operators and licensing authorities may decide that supervision of entrances or machines is appropriate for particular cases but it will need to be decided whether these need to be SIA licensed or not. It will not be automatically assumed that they need to be.



## CASINO PREMISES

- 5.33 To date, the Licensing Authority has chosen not to pass a resolution under section 166 (5) of the Gambling Act to prohibit casinos in the Borough.
- 5.34 Should the Council choose to make such a resolution, this will be a resolution of full Council following considered debate and the reasons for making the resolution will be given.

## BINGO PREMISES

- 5.35 Bingo is a class of equal chance gaming and is permitted in alcohol licensed premises and in clubs provided it remains below a certain threshold, otherwise it will be subject to a bingo operating licence which will have to be obtained from the Gambling Commission.
- 5.36 The holder of a Bingo Operating Licence will be able to provide any type of bingo game including cash and prize bingo. Where bingo is permitted in alcohol licensed and non-gambling premises, this must not become a predominant commercial activity; otherwise a bingo operating licence will be required.
- 5.37 Commercial bingo halls will require a bingo premises licence from the Council. Amusement arcades providing prize bingo will require a prize gaming permit from the Council.
- 5.38 In each of the above cases it is important that where children are allowed to enter premises licensed for bingo, in whatever form, they are not allowed to participate in any bingo game, other than on category D machines. When considering applications of this type the Council will therefore take into account, among other things, the location of the games or machines, access to those areas, general supervision of the premises and the display of appropriate notices.
- 5.39 The Licensing Authority recognises that there is no ban on children or young people having access to Bingo premises, that it is illegal for Under 18s to play or use Category B and C machines and that they cannot be employed in providing facilities for gambling or bingo premises. In any event, children under 16 cannot be employed in any capacity at a time when facilities for playing bingo are being offered. 16 and 17 year olds may be employed while bingo is taking place provided the activities on which they are employed are not connected with the gaming or gaming machines. Where children aged 16 and 17 are employed in bingo premises, the Licensing Authority would expect to see sufficient controls restricting access to Category B and C machines.

~~5.40~~ A limited number of gaming machines may also be made available at Bingo licensed premises. A list of categories of gaming machines is on page ~~43~~ 57

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5.40 category C or above machines are available in premises to which children are admitted, the licensing authority will seek to ensure that:

- i) All such machines are located in an area of the premises separated from the remainder of the premises by a physical barrier which is effective to prevent access other than through a designated entrance.
- ii) Only adults are admitted to the area where these machines are located.
- iii) Access to the area where the machines are located is supervised.
- iv) The area where the machines are located is arranged so that it can be observed by staff of the operator or the licence holder and
- v) At the entrance to, and inside any such area there are prominently displayed notices indicating that access to the area is prohibited to persons under the age of 18.

5.41 The Council will expect applicants to offer their own measures to meet licensing objectives however appropriate measures / licensing conditions may cover issues such as:

- Proof of age schemes.
- CCTV – this should be of sufficient quality that it will use evidence.
- the provision of entrances/machine areas
- physical separation areas
- location of entry
- notices/signage
- specific opening hours
- self-exclusion schemes - these are schemes whereby individuals who acknowledge they have a gambling problem ask to be barred from certain premises
- provision of information leaflets/helpline numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures that the Council can consider implementing.

5.42 Licensees should have procedures that require their staff to check the age of any customer who appears to be under 25.

5.425.43 With regard to segregation of Category B and C machines from Category D machines, there is a requirement that there must be clear segregation between these types of machine so that children do not have access to Category B or C machines and the Licensing Authority will take into account any guidance issued by the Gambling Commission in the light of any regulations made by the Secretary of State.

**Members' Clubs and Commercial Clubs**

5.435.44 Bingo may be provided at clubs and institutes either in accordance with a permit or providing that the limits in section 275 of the Act are complied with. These

restrictions limit the aggregate stake or prizes within any seven days to £2000, and require the Commission to be notified as soon as is reasonably practicable if that limit is breached. Stakes or prizes above that limit will require a Bingo Operators Licence and the corresponding Personal and Premises licences.

~~5.44~~5.45 With regard to turnover, where the Licensing Authority has concerns ~~is suspicious has concerns~~ that a licensee or club exceeds the turnover in the required 7-day period, the Licensing Authority will inform the Gambling Commission accordingly.

~~5.45~~5.46 The Licensing Authority will take into account any additional guidance issued by the Gambling Commission in relation to the suitability and layout of bingo premises.

### **BETTING PREMISES**

~~5.46~~5.47 The Licensing Authority is responsible for issuing and monitoring Premises Licences for all betting premises. Anyone wishing to operate a betting office will require a Betting Premises Licence from the Council.

5.48 Children and young people will not be able to enter premises with a betting premises licence.

~~5.47~~ Licencees should have procedures that require their staff to check the age of any customer who appears to be under 25.

~~6.45~~5.49

~~6.44~~5.50

~~6.42~~5.51 5.48 Betting premises will be able to provide a limited number of gaming machines and some betting machines. A table showing the number and category of gaming machines permitted in betting premises is on page 44

~~6.43~~ In premises licensed for alcohol consumption, the Licensing Authority Council has the power to restrict the number of gaming machines, their nature and the circumstances in which they are made available. It will not generally exercise this power though unless there are good reasons to do so taking into account, among other things: the size of the premises, the level of management, supervision and ability of staff to monitor the use of machines especially where children and young or vulnerable people are concerned; and the number of counter positions available for person-to-person transactions.

5.52

~~6.44~~5.53 The Licensing Authority Council will expect applicants to offer their own measures to meet the licensing objectives however appropriate measures / licensing conditions may cover issues such as:

- Proof of age schemes.
- CCTV – this should be of sufficient quality that it will use evidence.
- the provision of entrances/machine areas
- physical separation areas
- location of entry
- notices/signage
- specific opening hours
- self-exclusion schemes - these are schemes whereby individuals who acknowledge they have a gambling problem ask to be barred from certain premises

- provision of information leaflets/helpline numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures that the Council can consider implementing.

## TRACKS

- 5.53 Only one Premises Licence can be issued for any particular premises at any time unless the premises is a 'track'. A track is a site where races or other sporting events take place.
- 5.54 Track operators are not required to hold an 'Operators Licence' granted by the Gambling Commission. Therefore, premises licences for tracks, issued by the Council are likely to contain requirements for premises licence holders about their responsibilities in relation to the proper conduct of betting. Track operators will have an important role to play, for example in ensuring that betting areas are properly administered and supervised.
- 5.55 Although there will primarily be a betting premises licence for the track, there may be a number of subsidiary licences authorising other gambling activities to take place. Unlike betting offices, a betting premises licence in respect of a track does not give an automatic entitlement to use gaming machines.
- 5.56 Licensing authorities have a power under the Gambling Act 2005 to restrict the number of betting machines, their nature and the circumstances in which they are made available, by attaching a licence condition to a betting premises licence. When considering whether to exercise its power to restrict the number of betting machines at a track the Council will consider the circumstances of each individual application and, among other things will consider the potential space for the number of machines requested, the ability of track staff to supervise the machines, especially if they are scattered around the site, and the ability of the track operator to prevent children and young persons and vulnerable people betting on the machines.
- 5.57 This Licensing Authority is aware that the Gambling Commission may provide further specific guidance as regards tracks. We have taken note of the Guidance from the Gambling Commission which highlights that tracks are different from other premises in that there may be more than one premises licence in effect and that the track operator may not be required to hold an operator licence as there may be several premises licence holders at the track which will need to hold their own operator licences.
- 5.58 There may be some specific considerations with regard to the protection of children

and vulnerable persons from being harmed or exploited by gambling and this authority would expect the premises licence applicants to demonstrate suitable measures to ensure that children do not have access to adult only gaming facilities. It is noted that children and young person's will be permitted to enter track areas where facilities for betting are provided on days when dog- racing and/or horse racing takes place, although they are still prevented from entering areas where gaming machines (other than category D machines) are provided.

5.59 Measures such as the use of self-barring schemes, provision of information leaflets and helpline numbers for organisations such as GamCare will be considered suitable in relation to the protection of children and vulnerable people.

5.60 Where appropriate, in order for the Licensing Authority to gain a proper understanding of what it is being asked to licence, applicants will be asked to:

- i) Provide a detailed plan of the grounds indicating where the betting is to take place and the location of the race track;
- ii) In the case of dog tracks and horse racecourses, indicate the location of any fixed and mobile pool betting facilities operated by the Tote or track operator as well as any other proposed gambling facilities;
- iii) Evidence measures taken to ensure the third Licensing Objective will be complied with;
- iv) Indicate what arrangements are being proposed for the administration of the betting; the Gambling Commission and Licensing Authority recommend that betting takes place in areas reserved for, and identified as being for that purpose.
- v) Define the areas of the track that will be used by on course operators visiting the track on race days.
- vi) Define any temporary structures erected on the track for providing facilities for betting.
- vii) Define the location of any gaming machines (if any).

5.61 Plans should make clear what is being sought for authorisation under the track betting premises licence and what, if any, other areas are to be subject to a separate application for a different type of premises licence.

### **Betting Machines at Tracks**

[5.62](#) In addition to the comments above at betting machines in betting premises, similar considerations apply in relation to tracks, where the potential space for such machines may be considerable, bringing with it significant problems in relation to the proliferation of such machines, the ability of track staff to supervise them if they are scattered around the track and the ability of the track operator to comply with the law and prevent children betting on the machine. The Licensing Authority may consider restricting the number and location of betting machines, in the light of the circumstances of each



application for a track betting premises licence.

5.62

5.63 This Licensing Authority notes the Commission's view, that it would be preferable for all self-contained premises operated by off-course betting operators on tracks to be the subject of separate premises licences. This would ensure that there was clarity between the respective responsibilities of the track operator and the off-course betting operator running a self-contained unit on the premises.

#### **Condition on rules being displayed**

5.64 In line with guidance from the Gambling Commission the Council will attach a condition to track premises licences requiring the track operator to ensure that the rules are prominently displayed in or near the betting areas, or that other measures are taken to ensure that they are made available to the public. For example, the rules could be printed in the race-card or made available in leaflet form from the track office.

#### **ADULT GAMING CENTRES**

5.65 As no one under the age of 18 is permitted to enter an Adult Gaming Centre, this Licensing Authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the Licensing Authority that there will be sufficient measures to ensure that under ~~18-year-olds~~**18-year-olds** do not have access to the premises. Applicants are recommended to consider this Licensing Objective very carefully when applying for an **Adult Gaming Centre**.

~~5.65~~ Licensees should have procedures that require their staff to check the age of any customer who appears to be under 25. **Adult Gaming Centre.**

5.66

~~5.66~~**5.67** The Council will expect applicants to offer their own measures to meet licensing objectives however appropriate measures / licensing conditions may cover issues such as:

- Proof of age schemes.
- CCTV – this should be of sufficient quality that it will use evidence.
- the provision of entrances/machine areas
- physical separation areas
- location of entry

- notices/signage
- specific opening hours
- self-exclusion schemes - these are schemes whereby individuals who acknowledge they have a gambling problem ask to be barred from certain premises
- provision of information leaflets/helpline numbers for organisations such as GamCare

This list is not mandatory, nor exhaustive, and is merely indicative of example measures that the Council can consider implementing.

~~5.67~~5.68 Where the Adult Gaming Centre is situated in a complex such as an airport, shopping area or motorway service station, the Licensing Authority will pay particular attention to the location of entry so as to minimise opportunities for children gaining access.

~~5.68~~5.69 A table showing the number and category of gaming machines permitted in adult gaming centres is on page 44

### **FAMILY ENTERTAINMENT CENTRES (FECs)**

~~5.69~~5.70 There are two classes of family entertainment Centres. Licensed FECs provide Category C and D machines and require a Premises Licence. Unlicensed FECs provide Category D machines only and are regulated through FEC Gaming Machine Permits.

#### **(Licensed) Family Entertainment Centres**

5.71 Children and young persons may enter FECs but are not permitted to play Category C machines. This licensing authority will specifically have regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to ensure that there will be sufficient measures to prevent under 18 year olds having access to the adult only gaming machine areas.

~~5.70~~ [Licensees should have procedures that require their staff to check the age of any customer who appears to be under 25.](#)

5.72

~~5.74~~5.73 With regard to vulnerable persons, the Licensing Authority will consider measures such as the use of self-barring schemes, provision of information leaflets/help line numbers for organizations such as GamCare as appropriate measures.

~~5.72~~5.74 With regard to segregation of Category C machines in licensed FECs, there is a requirement that there must be clear segregation between the two types of machine so that children do not have access to Category C machines and the Licensing Authority will take into account any guidance issued by the Gambling Commission in the light of any regulations made by the Secretary of State.

~~5.73~~5.75 Applicants are recommended to visit the Gambling Commission's website in order to familiarise themselves with the conditions applicable to these premises.

### Statement of Principles

5.745.76 As these premises are open to children and young persons, the Licensing Authority will wish to see additional information, such as:

- i) A plan of the premises showing clear segregation of Category C and D machines.
- ii) Clear Notices excluding under ~~18-year-olds~~18-year-olds from the designated areas where Category C machines are located;
- iii) Age Restriction Policy;

- iv) Evidence of ongoing staff training in administering all aspects of age restriction policy;
- v) Solid physical barriers separating adult gaming area from the main floor, i.e. the barriers to be a min. of 1 metre in height from the floor;
- vi) Completion of a training programme in social awareness in respect of gambling
- vii) Evidence of compliance with BACTA's Code of Practice

### **TRAVELLING FAIRS**

5.755.77 Travelling fairs do not require any permit to provide gaming machines but must comply with the legal requirements on the way the machine operates. They may provide an unlimited number of Category D gaming machines and it will fall to the licensing authority to decide whether, where category D machines and/or equal chance prize gaming without a permit is to be made available for use at travelling fairs, the statutory requirement that the facilities for gambling amount to no more than an ancillary amusement at the fair is met.

5.765.78 The Licensing Authority will consider whether or not a travelling fair falls within the statutory definition of a travelling fair and recognises that the 27 day statutory maximum for the land being used as a fair, is per calendar year, and that it applies to the piece of land on which the fairs are held, regardless of whether it is the same or different travelling fairs occupying the land. The Licensing Authority will work with neighbouring authorities to ensure that land that crosses joint boundaries is monitored so that the statutory limits are not exceeded.

### **REVIEW OF PREMISES LICENCES**

5.775.79 A premises licence may be reviewed by the Licensing Authority of its own volition or following receipt of an application for a review, which is essentially a request by a third party to the Licensing Authority to review a particular licence.

5.785.80 However, it is for the Licensing Authority to decide whether or not the review is to be carried out. This will be on the basis of whether the request for the review is relevant to the matters listed below as well as consideration as to whether the request is

frivolous, vexatious, will certainly not cause the Authority to wish to alter/revoke/suspend the licence or whether it is substantially the same as previous requests for review.

5-795.81 The review will be:

- i) In accordance with any relevant Code of Practice issued by the Gambling Commission.
- ii) In accordance with any relevant Guidance issued by the Gambling Commission.

- iii) Reasonably consistent with the Licensing Objectives and
- iv) In accordance with the Licensing Policy Statement.

~~5.80~~5.82 Licensing Authority officers may be involved in the initial investigations of complaints leading to a review, or may try informal mediation or dispute resolution before a full review is conducted. An application for review must be granted, unless it decides to reject the application in accordance with the act.

5.83 The Licensing Authority can also initiate a review of a licence on the basis of any reason that it thinks is appropriate with regard to the licensing objectives. This can extend to a review of a class of licences where it considers particular issues have arisen.

## APPEALS

5.84 Appeals against decisions by a licensing authority are set out in s.206-209 of the Act and relate to decisions made under Part 8 of the Act. These include:

- Applications for a premises licence
- Applications to vary or transfer a premises licence
- Applications for provisional statements
- Reviews of premises licences

5.85 An appeal against a decision of the Licensing Authority has to be made to the Magistrates' Court.

5.84—The appellant must give notice of their appeal within 21 days of their having received notice of the relevant decision. During that period, and until any appeal that has been brought has been finally determined, a determination or other action by the licensing authority will not have effect unless the licensing authority so directs.

5.86

5.87 The Magistrates' may decide to:

- Dismiss the appeal
- Substitute the decision with any other decision that could have been made by the Licensing Authority
- Remit the case back to the licensing authority to deal with the appeal in accordance with the direction of the Court.

5.88 Once the appeal decision has been notified to all parties, the Licensing Authority shall not delay its implementation. Therefore, necessary action should be taken immediate on receipt of the decision.

## **PART 6 GAMING PERMITS**

### **INTRODUCTION TO PERMITS**

- 6.1 Permits are required when premises provide a gambling facility but either the stakes and prizes are very low or gambling is not the main function of the premises. The permits regulate gambling and the use of gaming machines in a specific premises.
- 6.2 The Licensing Authority is responsible for issuing the following permits:
- Family Entertainment Centre (FEC) Gaming Permits
  - Club Gaming Permits and Club Machine Permits
  - Alcohol –licensed Premises Gaming Machine Permits
  - Prize Gaming permits
- 6.3 The Licensing Authority may only grant or reject an application for a permit and cannot impose or attach any conditions.
- 6.4 There are different considerations to be taken into account when considering the different types of permit applications. Please refer to the relevant parts of this below.

### **GAMING MACHINES**

- 6.5 A gaming machine can cover all types of gambling activity, which can take place on a machine, including betting on virtual events. A machine is not a gaming machine if the winning of a prize is determined purely by the player's skill. However, any element of chance imparted by the action of the machine would cause it to be a gaming machine.
- 6.6 Where the Licensing Authority is uncertain of whether or not a machine is a gaming machine as defined under the Act, it will seek the advice of the Gambling Commission.
- 6.7 There are four classes of gaming machines: Categories A, B, C and D, with category B further divided into sub-categories B1, B2, B3, B3A and B4. The table below sets out the current maximum stakes and prizes that apply to each category:



### CATEGORIES OF GAMING MACHINES

CATEGORY	MAXIMUM STAKE	MAXIMUM PRIZE
<b>A</b>	Unlimited	Unlimited
<b>B1</b>	£5	£10,000*
<b>B2</b>	£100 (in multiples of £10) £2 effective April 2019	£500
<b>B3</b>	£2	£500
<b>B3A</b>	£2	£500
<b>B4</b>	£2	£400
<b>C</b>	£1	£100
<b>D**</b>	-	-
<b>D</b> non-money prize (other than crane grab machine)	30p	£8
<b>D</b> non-money prize (crane grab machine)	£1	£50
<b>D</b> money prize (other than a coin pusher or penny falls machine)	10p	£5
<b>D</b> combined money and non-money prize (other than coin pusher or penny falls machines)	10p	£8 (of which no more than £5 may be a money prize)
<b>D</b> combined money and non-money prize (coin pusher or penny falls machine)	20p	£20 (of which no more than £10 may be a money prize)

\* Category B1 where the prize value available through its use is wholly or partly determined by reference to use made of one or more other subcategory B1 machines, no more than £20,000

\*\* Category D machines with a 10p stake are entitled to offer prizes of up to £5 in cash, or up to £5 in cash and £3 in non-monetary prizes. Category D machines with a 30p stake can offer £8 in non-monetary prizes only.

- 6.8 The Gambling Act also prescribes the maximum number and category of gaming machines that are permitted in each type of gambling premises. This includes premises with permit entitlements, as well as licensed premises (see table on page 35):

### NUMBER OF GAMING MACHINES BY PREMISES TYPE

TYPE	GAMING MACHINES
BINGO PREMISES	<p>MAXIMUM OF 20% OF THE TOTAL NUMBER OF GAMING MACHINES WHICH ARE AVAILABLE FOR USE ON THE PREMISES FOR CATEGORIES B3 AND B4.</p> <p>NO LIMIT ON CATEGORY C AND CATEGORY D MACHINES</p>
BETTING PREMISES	<p>MAXIMUM OF 4 GAMING MACHINES CATEGORIES B2 TO D (EXCEPT B3A MACHINES)</p>
TRACK BETTING PREMISES WHERE POOL BETTING LICENCE HELD	<p>MAXIMUM OF 4 GAMING MACHINES CATEGORIES B2 TO D (EXCEPT B3A MACHINES)</p>
ADULT GAMING CENTRE	<p>MAXIMUM OF 20% OF THE TOTAL NUMBER OF GAMING MACHINES WHICH ARE AVAILABLE FOR USE ON THE PREMISES FOR CATEGORIES B3 AND B4.</p> <p>NO LIMIT ON CATEGORY C AND CATEGORY D MACHINES</p>
FAMILY ENTERTAINMENT CENTRE WITH PREMISES LICENCE	<p>NO LIMIT ON CATEGORY C AND CATEGORY D MACHINES</p>
FAMILY ENTERTAINMENT CENTRE WITH GAMING PERMIT	<p>NO LIMIT ON CATEGORY D MACHINES</p>
MEMBERS CLUB PREMISES	<p>MAXIMUM OF 3 GAMING MACHINES IN CATEGORIES B3A OR B4 TO D (ONLY ONE B3A MACHINE CAN BE SITED AS PART OF THIS ENTITLEMENT)</p>
COMMERCIAL CLUBS	<p>MAXIMUM OF THREE GAMING MACHINES IN CATEGORIES B4 TO D</p>
ON SALES ALCOHOL LICENSED PREMISES	<p>MAXIMUM OF 2 GAMING MACHINES IN CATEGORIES C TO D BY NOTIFICATION NUMBER OF</p>
ON SALES ALCOHOL LICENSED PREMISES WITH GAMING MACHINE PERMIT	<p>CATEGORY C TO D MACHINES AS SPECIFIED ON PERMIT</p>

### **(UNLICENSED) FEC GAMING MACHINE PERMITS**

6.9—Where Premises do not hold a Premises Licence but wishes to provide gaming machines, it may apply to the licensing authority for this permit. It should be [noted that under](#)

6.9 ~~noted that under~~ section 238 the applicant must show that the premises will be wholly or mainly used for making gaming machines available for use.

6.10 The Act states that a licensing authority may prepare a statement of principles that they propose to consider in determining the suitability of an applicant for a permit. In preparing that statement, and/or considering applications, it need not (but may) have regard to the licensing objectives and shall have regard to any relevant guidance issued by the Commission under section 25.

6.11 A FEC gaming machine permit may be granted only satisfied that the premises will be used as an unlicensed FEC, and if the Chief Officer of Police has been consulted on the application. The Licensing Authority may grant or refuse a permit but cannot impose conditions upon the grant of a permit. Therefore the licensing authority will wish to be satisfied as to the applicant's suitability before granting a permit. Unlicensed FECs, by definition, will not be subject to scrutiny by the Gambling Commission as no operating (or other) licences will be applied for and issued.

#### **Statement of Principles**

6.12 Applicants will be expected to show that there are policies and procedures in place to protect children from harm. Harm in this context is not limited to harm from gambling but includes wider child protection considerations. The efficiency of such policies and procedures will each be considered on their merits. However, they may include background checks on staff, training for staff in dealing with unsupervised very young children being on the premises, or children causing perceived problems on or around the premises.

6.13 Applicants will be expected to demonstrate:

- i) A full understanding of the maximum stakes and prizes of the gambling that is permissible in unlicensed FECs.
- ii) That the applicant has no relevant convictions (those that are set out in Schedule 7 of the Act).
- iii) That staff are trained to have a full understanding of the maximum stakes and prizes; and
- ~~iv)~~ iv) An awareness of local school holiday times and how to identify the local education office should truants be identified.

6.14 Compliance with the Code of Practice in relation to FECs, issued by BACTA, will be taken by the Licensing Authority as evidence that (apart from the criteria relating to criminal convictions) the applicant has met the above.

6.15 As these premises are open to children and young persons, the Licensing Authority will require additional information when an applicant applies for this Permit, as follows:

- (i) A plan of the premises to a scale of 1:100. If a 1:100 scaled plan cannot be submitted the plans must be clear and legible in all material respects. All plans must show the exits/entrances to the premises, location of gaming machines, and the location of safety equipment such as fire extinguishers and indicating the location of appropriate clear and prominent notices and barriers, such Notices to state:
  - (a) That no unaccompanied child will be permitted to remain on the premises if that person is required by law to attend school;
  - (b) Highlighting the need to play responsibly;
  - (c) The number and location of Category D machines;
- (ii) Evidence of staff training by way of a Premises Log Book, covering how staff would deal with unsupervised very young children being on the premises, or children causing perceived problems on/around the premises;
- (iii) The amount of space around gaming machines to prevent jostling of players or intimidation;
- (iv) Location and supervision of Automated Teller Machines;
- (v) Proof of Age scheme;
- (vi) Evidence that the applicant has complied with Health and Safety and Fire Safety legislation;
- (vii) Details of opening hours;
- (viii) Details of external appearance of premises;
- (ix) Numbers of staff employed;
- (x) Insurance documents and any other such information the Licensing Authority will from time to time require;
- (xi) Any other policies or procedures in place to protect children from harm.

6.16 The above statement of principles will apply in relation to initial applications only and not renewals.

6.17 With regard to renewals, the Licensing Authority may refuse an application for renewal of a permit only on the grounds that an authorised local authority officer has been refused access to the premises without reasonable excuse, or that renewal would not be reasonably consistent with pursuit of the licensing objectives.

6.18 Where an applicant fails to comply with the above requirements, the Licensing Authority may refuse the application. Where there is such a refusal, the Licensing Authority will notify the applicant of its intention to refuse and the reasons for the refusal. The applicant will then have an opportunity to make representations orally, in writing or both and will have a right of appeal against any decision made.

- 6.19 Where the Permit has been granted the Licensing Authority will issue the permit as soon as is reasonably practicable and in any event in line with the Regulations issued by the Secretary of State. The permit will then remain in effect for 10 years unless surrendered or lapsed.
- 6.20 As these premises particularly appeal to children and young persons, the Licensing Authority will give weight to child protection issues and will also consider an applicant's suitability for FEC permits and factors taken into account will include the Applicant's criminal record and previous history and experience of running similar premises, if any.

#### **CLUB GAMING AND CLUB MACHINES PERMITS**

- 6.21 Members Clubs and Miners' Welfare Institutes (not Commercial Clubs) may apply for a Club Gaming Permit or Club Gaming Machine Permit.
- 6.22 **Club Gaming Permit**  
Club gaming permits allow the premises to provide:
- i) Up to three machines of categories B, C or D.
  - ii) Equal chance gaming; and
  - iii) Games of chance as set out in regulations.
- 6.23 **Club Gaming Machine Permit**  
A club gaming machine permit will enable the premises to provide up to three machines of categories B, C or D.
- 6.24 Before granting a permit, the Licensing Authority will wish to be satisfied that applicants for these permits meet the statutory criteria for members' clubs contained in sections 266 and 267 of the Gambling Act and may grant the permit provided the majority of members are over 18 years of age.
- 6.25 The Licensing Authority recognises that there is a 'fast track' procedure for premises holding a Club Premises Certificate under the Licensing Act 2003 and that there is no opportunity for objections to be made by the Commission or the Police and the grounds upon which the Licensing Authority can refuse a permit are reduced.

#### **ALCOHOL LICENSED PREMISES GAMING MACHINE PERMITS**

- 6.26 There is provision in the Act for premises licensed to sell alcohol for consumption on the premises, to automatically have two gaming machines, of categories C and/or D. The premises licence holders merely need to notify the Licensing Authority that they intend to exercise their automatic entitlement to gaming machines in their premises.

- 6.27 Under section 284 the Licensing Authority can remove the automatic authorisation in respect of any particular premises if:
- i) Provision of the machines is not reasonably consistent with the pursuit of the licensing objectives.
  - ii) Gaming has taken place on the premises that breaches a condition of section 282 of the Gambling Act (i.e. that written notice has been provided to the Licensing Authority, that a fee has been provided and that any relevant code of practice issued by the Gambling Commission about the location and operation of the machine has been complied with).
  - iii) The premises are mainly used for gaming; or
  - iv) An offence under the Gambling Act has been committed on the premises.
- 6.28 Should it necessary to issue section 284 order, the licence-holder will be given at least twenty-one days' notice of the intention to make the order, and consider any representations which might be made. The authority will hold a hearing if the licensee requests it.
- 6.29 If a premises wishes to have more than 2 machines, then it needs to apply for a permit and the licensing authority must consider that application based upon the licensing objectives, any guidance issued by the Gambling Commission issued under Section 25 of the Gambling Act 2005, and "such matters as they think relevant."

#### **Statement of Principles**

- 6.30 This Licensing Authority considers that such matters will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under-18 year olds do not have access to the adult-only gaming machines.
- 6.31 Measures which will satisfy the authority that there will be no access may include the adult machines being in sight of the bar, or in the sight of staff that will monitor that the machines are not being used by those under 18. Notices and signage may also be helpful. As regards the protection of vulnerable persons applicants may wish to consider the provision of information leaflets/helpline numbers for organisations such as GamCare.
- 6.32 The Licensing Authority will usually expect holders of gaming machine permits to ensure that the gaming machines are sited in accordance with any relevant code of practice issued by the Gambling Commission and to ensure that they can be adequately supervised whilst in use.

- 6.33 It is recognised that some alcohol-licensed premises may apply for a premises licence for their non-alcohol licensed areas. Any such application would need to be applied for, and dealt with as an adult entertainment centre premises licence.
- 6.34 It should be noted that the Licensing Authority is empowered to grant the application with a smaller number of machines and/or a different category of machines than that applied for. Conditions (other than those restricting the number or category of machines) cannot be attached.
- 6.35 It should also be noted that the holder of a permit must comply with any Code of Practice issued by the Gambling Commission about the location and operation of the machine.

#### **PRIZE GAMING PERMITS**

- 6.37 The licensing authority may prepare a statement of principles which they propose to apply in exercising their functions which may, in particular, specify matters that the licensing authority proposes to consider in determining the suitability of the applicant for a permit.
- 6.38 Prize gaming may be provided in bingo premises as a consequence of their bingo operating licence. Any type of prize gaming may be provided in adult gaming centres and licensed family entertainment centres. Unlicensed family entertainment centres may offer equal chance prize gaming under a gaming machine permit. Prize gaming without a permit may be provided by travelling fairs providing none of the gambling facilities at the fair amount to more than an ancillary amusement. Children and young people may participate in equal chance gaming only.
- 6.39 In making its decision on an application for this permit the Licensing Authority does not need to have regard to the licensing objectives but must have regard to any Gambling Commission guidance.
- 6.40 Applicant should set out the types of gaming they are intending to offer and should be able to demonstrate:
- i) That they understand the limits to stakes and prizes that are set out in Regulations; and
  - ii) That the gaming offered is within the law.
- 6.41 It should be noted that there are conditions in the Gambling Act 2005 by which the permit holder must comply, but that the Licensing authority cannot attach conditions. The conditions in the Act are:
- i) The limits on participation fees, as set out in regulations, must be complied with.



- ii) All chances to participate in the gaming must be allocated on the premises on which the gaming is taking place and on one day; the game must be played and completed on the day the chances are allocated; and the result of the game must be made public in the premises on the day that it is played.
- iii) The prize for which the game is played must not exceed the amount set out in regulations (if a money prize), or the prescribed value (if non-monetary prize); and
- iv) Participation in the gaming must not entitle the player to take part in any other gambling.

6.42 Applications may only be made by people who occupy or plan to occupy the premises, are aged 18 or over (if an individual), and no premises licence or club gaming permit under the Gambling Act 2005 may be in force.

#### **Statement of Principles**

- 6.43 This licensing authority considers that such matters will be decided on a case by case basis but generally there will be regard to the need to protect children and vulnerable persons from harm or being exploited by gambling and will expect the applicant to satisfy the authority that there will be sufficient measures to ensure that under-18 year olds do not have access to unequal chances prize gaming.
- 6.44 A plan must accompany applications indicating where, and what type, of prize gaming is to be provided.
- 6.45 The grounds for decision making as regards renewals are the same as for initial applications.
- 6.46 Where the Licensing Authority intends to refuse the application for a permit, it will notify the applicant of its intention to refuse it stating the reasons and offering the applicant an opportunity to make representations orally or in writing or both.

**PART 7**  
**TEMPORARY AND OCCASIONAL USE NOTICES**

**TEMPORARY USE NOTICES (TUN)**

- 7.1 A Temporary Use Notice (“TUN”) is a notice which authorises a person or an organisation to conduct gaming activities for a temporary period of time, at a particular premises. However, a TUN may only be granted if the premises user is already in possession of a relevant Operating Licence. The London Borough of Hillingdon is bound by a number of statutory limits ~~regarding as regards~~ TUNs. Section 218 of the Act refers to a ‘set of premises’ and provides that a set of premises is the subject of a temporary use notice if ‘any part’ of the premises is the subject of a TUN.
- 7.2 The reference to a ‘set of premises’ prevents one large premise from having a temporary use notice in effect for more than 21 days in a year by giving notification in relation to different parts of the premises and re-setting the clock.
- 7.3 The Licensing Authority will decide what constitutes a ‘set of premises’ where Temporary Use Notices are received relating to the same building/site.
- 7.4 In considering whether a place falls within the definition of a ‘set of premises’ the Licensing Authority will look at the ownership/occupation and control of the premises and the Licensing Authority will consider whether different units are in fact different ‘sets of premises’. An example would be a large exhibition centre with different exhibition halls. This would be considered properly as one premise and would not be granted a temporary use notice for each of its exhibition halls.
- 7.5 A TUN must be lodged with the Licensing Authority not less than three (3) months and one (1) day before the day on which the gambling event will begin. The person who is giving the TUN must ensure that the notice and copies are with the Licensing Authority and named responsible authorities within seven (7) days of the date of the notice.
- 7.6 On receipt of a TUN the Licensing Authority will send a written acknowledgement as soon as is reasonably practicable and this may be by way of ~~eE~~-mail.
- 7.7 If no objections are made within 14 days of the date of the temporary use notice, the Licensing Authority will grant and return the notice with an endorsement of validity.
- 7.8 If objections are received within 14 days of the date of notice, a hearing will be held to consider the issue of a TUN. Those who raise objections may offer modifications to the notice that will resolve their objections. If all participants to a hearing agree that a hearing is unnecessary, the hearing may be dispensed with.

- 7.9 The Licensing Authority may object to notices where it appears that their effect would be to permit regular gambling in a place that could be described as one set of premises. The Licensing Authority and other bodies to which the notice is copied may give notice of objection but they must have regard to the Licensing Objectives and where there are such objections, they must give a notice of objection to the person who gave the TUN, such notice will be copied to the Licensing Authority.

#### **OCCASIONAL USE NOTICES (OUN)**

- 7.10 An Occasional Use Notice may be used where there is betting on a track on 8 days or less in a calendar year. The OUN dispenses with the need for a Betting Premises Licence for a track and the Licensing Authority will maintain a register of all applications.
- 7.11 The licensing authority has very little discretion as regards these notices aside from ensuring that the statutory limit of 8 days in a calendar year is not exceeded. The licensing authority will need to consider the definition of a 'track' and whether the applicant is permitted to avail him/herself of the notice.
- 7.12 Tracks are normally thought of as permanent race courses, but the meaning of track not only covers horse racecourses or dog tracks, but also any other premises on any part of which a race or other sporting event takes place or is intended to take place. Although the track need not be a permanent fixture, land used temporarily as a track providing races or sporting events may qualify.

**PART 8  
REGISTRATION OF SMALL SOCIETY LOTTERIES**

**DEFINITION OF SMALL SOCIETY LOTTERY**

- 8.1 The Gambling Act repeals the Lotteries and Amusements Act 1976. The Licensing Authority will register and administer smaller non-commercial lotteries. Promoting or facilitating a lottery will fall within 2 categories:
- i) Licensed Lotteries (requiring an Operating Licence from the Gambling Commission); and
  - ii) Exempt Lotteries (registered by the Licensing Authority).
- 8.2 Exempt Lotteries are lotteries permitted to run without a licence from the Gambling Commission and these are:
- i) Small Society Lotteries;
  - ii) Incidental Non-Commercial Lotteries;
  - iii) Private Lotteries;
  - iv) Private Society Lottery;
  - v) Work Lottery;
  - vi) Residents' Lottery;
  - vii) Customer Lotteries.
- 8.3 Societies may organise lotteries if they are licensed by the Gambling Commission or fall within the exempt category, and therefore registered by the Licensing Authority, because their proceeds are below specified levels. The Licensing Authority recommends those seeking to run lotteries take their own legal advice on which type of lottery category they fall within. However, guidance notes with regard to all lotteries, limits placed on small society lotteries and information setting out financial limits will be made available on the Council's website or by contacting the Licensing Authority.

**THE LICENSING AND REGISTRATION SCHEME**

- 8.4 Applicants for lottery licences must apply to the Licensing Authority in the area where their principal office is located. Where the Licensing Authority believes that the Society's principal office is situated in another area it will inform the Society as soon as possible and where possible, will inform the other Licensing Authority.
- 8.5 Lotteries will be regulated through a licensing and registration scheme, conditions imposed on licences by the Gambling Commission, Codes of Practice and any Guidance issued by the Gambling Commission. In exercising its functions with regard to small society and exempt lotteries, the Licensing Authority will have due regard to the Gambling Commission's Guidance.

- 8.6 The Licensing Authority will keep a Public Register of all applications and will provide information to the Gambling Commission on all lotteries registered by the Licensing Authority. As soon as the entry on the Register is completed, the Licensing Authority will notify the applicant of his registration. In addition, the Licensing Authority will make available for inspection by the public; the financial statements/returns submitted by societies in the preceding 18 months and will monitor the cumulative totals for each society to ensure the annual monetary limit is not breached. If there is any doubt, the Licensing Authority will notify the Gambling Commission in writing, copying this to the Society concerned.
- 8.7 The Licensing Authority will refuse applications for registration if in the previous five years, either an Operating Licence held by the applicant for registration has been revoked, or an application for an Operating Licence made by the applicant for registration has been refused. Where the Licensing Authority is uncertain as to whether or not an application has been refused, it will contact the Gambling Commission to seek advice.
- 8.8 The Licensing Authority may refuse an application for registration if in their opinion:
- i) The applicant is not a non-commercial society;
  - ii) A person who will or may be connected with the promotion of the lottery has been convicted of a relevant offence; or
  - iii) Information provided in or with the application for registration is false or misleading.
- 8.9 The Licensing Authority will ask applicants to set out the purposes for which the Society is established and will ask the Society to declare that they represent a bona fide non-commercial society and have no relevant convictions. The Licensing Authority may, however, seek further information from the Society.
- 8.10 Where the Licensing Authority intends to refuse registration of a Society, it will give the Society an opportunity to make representations and will inform the Society of the reasons why it is minded to refuse registration and supply evidence on which it has reached that preliminary conclusion. In any event, the Licensing Authority will make available on its website its procedures on how it handles representations.
- 8.11 The Licensing Authority may revoke the registered status of a society if it thinks that they would have had to, or would be entitled to; refuse an application for registration if it were being made at that time. However, no revocations will take place unless the Society has been given the opportunity to make representations. The Licensing Authority will inform the society of the reasons why it is minded to revoke the registration and will provide an outline of the evidence on which it has reached that preliminary conclusion.

- 8.12 Where a Society employs an external lottery manager, they will need to satisfy themselves that they hold an Operator's Licence issued by the Gambling Commission and the Licensing Authority will expect this to be verified by the Society.
- 8.13 The Licensing Authority will expect registered small society lottery societies to renew their registrations each year. It is not the responsibility of the Licensing Authority to issue reminders to small society lottery societies to advice of renewals. Registrations will expire if they are not renewed in a timely way. Cancellation of a small society lottery will be confirmed in writing by the Licensing Authority.

## **PART 9 DECISION MAKING**

### **THE LICENSING COMMITTEE**

- 9.1 The Licensing Committee will consist of at least 10 Members. Licensing Sub-committees consisting of 3 Committee Members will hear any relevant representations from Responsible Authorities and interested parties. Any of these individuals or groups may specifically request a representative to make representations on the applicant's behalf. This could be a legal representative, a friend, an MP or a Ward Councillor.
- 9.2 Where a Councillor who is a member of the Licensing Sub-Committee is making or has made representations regarding a licence on behalf of an interested party, in the interests of good governance they will disqualify themselves from any involvement in the decision-making process affecting the licence in question.
- 9.3 Licensing Authorities must have regard to the licensing objectives when exercising their functions in relation to premises licences, temporary use notices and some permits.
- 9.4 The decision determined by the Sub-Committee will be accompanied with clear, cogent reasons for that decision, having had due regard to being reasonably consistent with the Licensing Objectives; the Human Rights Act 1998; [the Equality Act 2010](#), [the Public Sector Equality Duty](#); any relevant code of practice under Section 24 of the Gambling Act 2005; any relevant guidance issued by the Commission under Section 25 of the Gambling Act 2005; and this Statement of Policy. The decision and the reasons for that decision will be sent to the Applicant and those who have made relevant representations as soon as practicable.

### **DELEGATION OF DECISION MAKING RESPONSIBILITIES**

- 9.5 The Council will be involved in a wide range of licensing decisions and functions and has established a Licensing Committee to administer them.
- 9.6 Appreciating the need to provide a speedy, efficient and cost-effective service to all parties involved in the licensing process, decisions on all licensing matters will be taken in accordance with an approved scheme of delegation, as attached at Annex C.
- 9.7 Many of the decisions and functions will be purely administrative in nature and the grant of non-contentious applications, including for example, those licences and permits where no representations have been made, will be delegated to Council Officers.

## PART 10

### ANNEX A

#### SCHEDULE OF CONSULTEES TO DRAFT POLICY

##### PERSONS OR BODIES REPRESENTING THE INTERESTS OF THOSE CARRYING ON GAMBLING BUSINESSES IN THE BOROUGH

Association of British Bookmakers  
Association of Licensed Multiple  
Retailers  
British Amusement Catering  
Association  
British Beer and Pub Association  
National Casino Industry Forum  
British Holiday & Home Parks  
Association  
Greyhound Board of Great Britain  
British Institute of Inn keeping  
Business in Sport and Leisure Ltd  
Casino Operators Association, UK  
Community Trade Union  
Federation of Licensed Victuallers  
Gamcare  
AGE UK  
Hillingdon Chamber of Commerce  
Remote Gambling Association  
Responsibility in Gambling Trust  
Rugby Football Union  
The Bingo Association  
The Football Association  
The Lotteries Council  
The Working Men's Club & Institute  
Union

##### PERSONS OR BODIES REPRESENTING THE INTERESTS OF THOSE WHO ARE LIKELY TO BE AFFECTED BY THE EXERCISE

##### OF THE AUTHORITY'S FUNCTIONS

All Elected (Ward) Councillors,  
London Borough of Hillingdon  
Council  
All "Responsible Authorities" as  
defined under the Gambling Act (see  
*Appendix C for list and contact  
details*)  
Alcoholics Anonymous (AA)  
Gamblers Anonymous  
Government Organisations: (LGA,  
ODPM, LACORS)  
Hillingdon Action Group for Addiction  
Management (HAGAM)  
Hillingdon Association of Voluntary  
Services  
Hillingdon's Children and Young  
People's Partnership Board  
(CYPSPB)  
Hillingdon Community and Police  
Consultative Group  
Hillingdon Drug and Alcohol Services  
Hillingdon Law Centre  
Hillingdon Mind  
Hillingdon NHS  
Hillingdon Salvation Army  
Hillingdon Samaritans  
Hillingdon Youth Offending Service  
Hillingdon Tenants and Residents  
Associations  
Hillingdon Federation of Community  
Associations & similar bodies  
Local Licensing Solicitors in  
Hillingdon  
Local Strategic Partnership Uxbridge  
Initiative  
Uxbridge Magistrates Court



NEIGHBOURING LONDON,  
COUNTY AND DISTRICT  
COUNCIL'S

London Boroughs of: Brent, Ealing,  
Hammersmith & Fulham, Harrow  
and Hounslow  
(*West London Alliance Members*)

And:  
Slough Borough Council  
Spelthorne Borough Council  
Hertfordshire County Council  
South Bucks District Council  
Three Rivers District Council

Note: This list was not intended to be exhaustive. Comments and observations were welcomed from anyone affected by this policy.

## ANNEX B

### SCHEDULE OF RESPONSIBLE AUTHORITIES

*For the purposes of the Act, Responsible Authorities are public bodies that must be notified of all applications and who are entitled to make representation in relation to Premise*

Hillingdon Licensing Authority  
The Licensing Service  
London Borough of Hillingdon Civic Centre,  
Uxbridge  
UB8 1UW  
[licensing@hillingdon.gov.uk](mailto:licensing@hillingdon.gov.uk)

The Gambling Commission  
4<sup>th</sup> Floor  
Victoria Square House  
Birmingham  
B2 4BP  
[info@gamblingcommission.gov.uk](mailto:info@gamblingcommission.gov.uk)

Police Licensing Uxbridge Police Station 1  
Warwick Place  
Uxbridge  
UB8 1PG  
[Licensing-xh@met.pnn.police.uk](mailto:Licensing-xh@met.pnn.police.uk)

London Fire Brigade  
169 Union Street London  
SE1 0LL  
Attn: North West Area Team  
[FSR-AdminSupport@london-fire.gov.uk](mailto:FSR-AdminSupport@london-fire.gov.uk)

**Head of Development Planning**  
London Borough Of Hillingdon  
Civic Centre  
Uxbridge  
UB8 1UW  
[Planning@hillingdon.gov.uk](mailto:Planning@hillingdon.gov.uk)

Authority for Pollution & Harm to  
Human Health  
c/o Antisocial Behaviour &  
Environment Team  
London Borough of Hillingdon Civic  
Centre, Uxbridge  
UB8 1UW  
[sset@hillingdon.gov.uk](mailto:sset@hillingdon.gov.uk)  
[asbinvestigations@hillingdon.gov.uk](mailto:asbinvestigations@hillingdon.gov.uk)

Local Safeguarding Children Board  
c/o Director of Childrens Services  
London Borough of Hillingdon Civic  
Centre, Uxbridge  
UB8 1UW  
[safeguardingchildrenadmin@hillingdon.gov.uk](mailto:safeguardingchildrenadmin@hillingdon.gov.uk)

HM Revenue & Customs  
Betting and Gambling Department Portcullis  
House  
21 India Street Glasgow  
G2 4PZ  
[nru.betting&gaming@hmrc.gsi.gov.uk](mailto:nru.betting&gaming@hmrc.gsi.gov.uk)

[Food, Health & Safety](#)  
[London Borough of Hillingdon Civic Centre,](#)  
[Uxbridge](#)  
[UB8 1UW](#)  
[foodhealthandsafety@hillingdon.gov.uk](mailto:foodhealthandsafety@hillingdon.gov.uk)

ANNEX C

SUMMARY OF DELEGATION OF POWERS AS ALSO SET OUT IN THE COUNCIL'S  
CONSTITUTION

<b>FUNCTION</b>	<b>COUNCIL / CABINET</b>	<b>SUB- COMMITTEE</b>	<b>OFFICER</b>
Approval of the three year Statement of Gambling Policy	Cabinet and Full Council		
Policy not to permit casinos	Full Council		
Fee Setting - when appropriate	Cabinet		
Application for premises licences		If representation made	If no representation made
Application for a variation to a licence		If representation made	If no representation made
Application for a transfer of a licence		Where representations have been received from the Commission	Where no representations received from the Commission
Application for a provisional statement		If representation made	If no representation made
Review of a premises licence		X	
Application for club gaming /club machine permits		If representation made	If no representation made
Cancellation of club gaming/ club machine permits		X	
Applications for other permits			X
Cancellation of licensed premises gaming machine permits			X

Consideration of temporary use notice			X
Notifications and applications for two or three gaming machines			X
	<b>COUNCIL / CABINET</b>	<b>SUB-COMMITTEE</b>	<b>OFFICER</b>
Applications for four to five gaming machines			Officers in consultation with the Chairman of the Licensing Sub-Committee
Applications for more than five gaming machines		By way of a report	
Decision to give a counter notice to a temporary use notice		X	
Section 284 Order to revoke the automatic entitlement for 2 gaming machine notifications		X	

## **ANNEX D**

### **Ward Councillor Call-in**

Where a Ward Councillor makes representations upon an application within their ward, in writing, to the relevant Head of Service for Licensing, within the appropriate statutory period of consultation for the application, and this representation has been forwarded to the Licensing Authority, ~~that~~ Authority, that application shall be scheduled to be heard by the Licensing Sub-Committee for determination. The Ward Councillor must include in their representations the reasons why they wish the application to be determined by the Sub- Committee and how the application adversely affects the licensing objectives.

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## Equality Impact Assessment

### STEP A) Description of what is to be assessed and its relevance to equality

What is being assessed? Please tick

Review of a service  Staff restructure  Decommissioning a service

Changing a policy  Tendering for a new service  A strategy or plan

**The review of the Council's Statement of Gambling Policy which takes place every 3 years and must be in place by January 2025.**

Who is accountable? E.g. Head of Service or Corporate Director

London Borough of Hillingdon – 'The Licensing Authority'

Date assessment completed and approved by accountable person

25<sup>th</sup> July 2024

Names and job titles of people carrying out the assessment

Daniel Ferrer, Licensing Team Manager

A.1) What are the main aims and intended benefits of what you are assessing?

Comprehensive review and consultation to implement the Council's new Statement of Gambling Policy. As a result, it is intended that this assessment will support effective and efficient delivery of licensing functions and the Council's objectives and allow for stakeholders views to be taken into account.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

The main users of the service that will be affected will be the actual applicants. Looking at previous applications and licences granted for premises licence holders, it is clear that they are mainly limited companies such as William Hill, Ladbrokes and Jennings. Therefore, we do not foresee any issues as their relevant applications and documentation will be dealt with by agents or their solicitors.

However, service users who may be affected are potentially customers using certain licenced premises and their services. For example, there are a number of betting shops in the south parts of the Borough such as Hayes. From inspections and general patrols around these premises, some of the equality profile of customers come from a Black, Asian, Minority and Ethnic Background.

Furthermore, another relevant key service user will be residents. Again, residents who are generally based geographically in the south may be affected. They maybe potentially made from a Black, Asian, Minority and Ethnic background and have always played an important role when submitting representations/objections and therefore providing a voice for the local community.

A.3) Who are the stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Applicants and licence holders	Ensure that they are supported by the Authority in making their applications and kept fully informed of the process and the implications of the reviewed Statement of Gambling Policy.
Residents and Businesses	Ensuring that specific requirements have been met by the applicant/licence holder and they are able to submit their objection/representation if it is valid under the legislation.
Licensing Committee, Cabinet & Council	Ensuring processes are followed in accordance with licensing legislation and that all information is presented to them in full so appropriate, reasonable and proportionate decisions can be made.
Chief Executive, Corporate Directors & Staff	Ensuring processes are followed in accordance with licensing legislation and that all information is presented to them in full so appropriate, reasonable and proportionate decisions can be made.



A.4) Which protected characteristics or community issues are relevant to the assessment? ✓ in the box.

**Only tick the boxes which relate to the data you have in A2.**

Age	✓	Religion or belief	✓
Disability	✓	Sex	✓
Gender reassignment	✓	Sexual Orientation	✓
Marriage or civil partnership	✓	Community Cohesion	✓
Pregnancy or maternity	✓	Community Safety	✓
Race/Ethnicity	✓	Other – please state	

**STEP B) Consideration of information; data, research, consultation, engagement**

B.1) Consideration of information and data - what have you got and what is it telling you?

The main source of data and information are the current records kept by the Licensing Authority such as applications for premises licences and gambling permits. In addition, there is the information and feedback received from officers who engage with applicants on the phone or with Management and staff face to face during site visits. It is noted that some customers at licenced gambling premises in the geographical south of the borough are from a Black, Asian, Minority and Ethnic Background. This is particularly the case with premises in areas such as Hayes. This is evident when inspections have been carried out to premises such as betting shops and pubs where gaming machines are present.

## Consultation

B.2) Did you carry out any consultation or engagement as part of this assessment?

Please tick ✓      NO ✓      YES

**If no, explain why:**

It was not felt necessary to complete consultation as part of this assessment however, in the implementation of the policy, there will be ongoing engagement with relevant parties during formal consultation.

B.3) Provide any other information to consider as part of the assessment

The new Statement of Gambling Policy is not anticipated to have a significant impact as there is a strong degree of consistency between the old and new document, it is merely reflecting minor updates to legislation and guidance.

On the whole, the amendments proposed have been drafted to clarify, formalise and, in some cases, simplify the processes in relation to applications under the Gambling Act 2005. The principles governing the Statement of Gambling Policy and the statutory fees remain consistent with the previous policy statement and recognise the wider community impacts that the Licensing Authority, residents, business community and other stakeholders must be aware of when participating in the licensing process. The new Statement of Gambling Policy recognises the need for a balance between the rights of businesses and the community.

The Licensing Authority have a public sector equality duty to the following protected characteristics:

- Age
- Disability
- Sex, gender reassignment, sexual orientation
- Pregnancy and maternity
- Race, religion or belief
- Marriage and Civil Partnership

Under the Equality Act 2010 (S.149) a public authority must, in the exercise of its functions, have due regard to the need to:-

- (a) Eliminate discrimination, harassment, victimisation and any other conduct that is prohibited under the 2010 Act
- (b) Advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it
- (c) Foster good relations between persons who share a relevant protected characteristic and persons who do not share it

**C) Assessment**

What did you find in B1? Who is affected? Is there, or likely to be, an impact on certain groups?

C.1) Describe any **NEGATIVE** impacts (actual or potential):

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>Applications from a Black, Asian, Minority and Ethnic background</b>	There may be customers and residents who have potential difficulties with submitting representations. The Licensing Team will offer advice on the telephone and will accommodate appointments during office hours. In addition, consideration will be given to officers carrying out site visits to meet potential objectors so they are able to gain a better understanding of any proposed applications and an effective way of submitting representations.

C.2) Describe any **POSITIVE** impacts

<b>Equality Group</b>	<b>Impact on this group and actions you need to take</b>
<b>Applications from a Black, Asian, Minority and Ethnic background</b>	Better quality of representations being submitted and as a result residents, responsible authorities and members of the Licensing Committee being well informed to make decisions when considering applications. Residents will feel valued and felt heard when they will be able to communicate their views on behalf of their community. Furthermore, better relationships will be formed between Council Officers, members of the public and businesses.

**D) Conclusions**

The Licensing Team has identified that there will be a number of gambling premises whose customers are from a Black, Asian, Minority and Ethnic background. This will be particularly the case where premises are located in the south of the Borough. In addition, residents in this geographical area will be of a similar background.

Literacy issues may be an issue within these communities and will therefore need to be considered. Local residents may require some assistance with applications, supporting documentation and explanation of Government guidance and the Council's Statement of Gambling Policy.

Licensing Officers will take appropriate steps to educate customers of these licensed premises and members of the public when it comes to Gambling queries and relevant applications. The Licensing Team will offer telephone advice to residents and customers and consideration will be given to meeting residents and customers at Council Offices to assist them in clarifying relevant application forms.



**Signed and dated: 25.07.24**

**Name and position: Daniel Ferrer, Licensing Team Manager**

## HOUSING ALLOCATION POLICY CONSULTATION DRAFT

<b>Committee name</b>	Residents' Services Select Committee
<b>Officer reporting</b>	Debby Weller - Head of Housing Strategy and Policy
<b>Papers with report</b>	Appendix A: Consultation Plan Appendix B: Draft Social Housing Allocation Policy
<b>Ward</b>	All

### HEADLINES

This report provides detail of the current consultation for a revised social housing allocation policy, and information regarding the consultation process.

### RECOMMENDATION:

**That the Residents' Services Select Committee reviews and comments on the draft policy and consultation process**

### SUPPORTING INFORMATION

1. On 25 July 2024 Cabinet agreed an updated Social Housing Allocation Policy for consultation. The Council is required to have a housing allocation scheme in place to assess housing need, advertise available social housing and allocate properties to households in need.
2. The proposed changes to the policy aim to make it more transparent for the Council and residents. The revised policy will make changes to the way in which applications for social housing are assessed and prioritised to determine the priority banding of each application. The changes will ensure greater transparency around those that are a priority for rehousing and seek greater priority for residents with a long-term attachment to the Borough. Social Housing is a scarce resource, that is in short supply. Through these changes we seek to make the best use of the stock available to us through prioritisation of those giving up larger properties or those needing to decant from their homes, and through allowing households that are severely overcrowded to move into homes that relieve some of the pressure, reduce waiting times and allow families to make decisions on what best meets their needs.
3. The consultation runs from 5 August 2024 through to 13 October 2024 and includes:
  - Use of the Council's website, social media channels
  - A survey will be made available for respondents to provide feedback on the draft policy
  - Individual and group events will be held to gather feedback from key stakeholders

See Appendix A for full consultation plan.

4. A further report detailing the outcome of the consultation, an equalities impact assessment, final policy and timeline for implementation will be presented to Cabinet in November 2024.
5. The Hillingdon Social Housing Allocation Policy is used by Hillingdon Council and its partner housing associations to allocate social housing using Locata Choice Based Lettings. The Housing Register currently has four main bands A, B, C, D. Within band A, prioritised ahead of other applicants, are: A1 (Permanent Decants), A2 (Under occupiers) and A3 (Management Transfers).
6. A comprehensive review has not been undertaken since 2013 and some elements of the policy require updating. A commitment to do this was included in the Hillingdon Council Housing Strategy 2021/22 to 2025/26. One of the main purposes of this review is to reduce the congestion in Bands A and B to allow for more effective prioritisation. For the same purpose, greater clarity is sought for the prioritisation of key groups i.e. the more vulnerable care experienced young people moving on from social care; vulnerable single people moving on from homeless supported accommodation recommended for social housing by the Single Homeless Move On Panel; and people moving on from other types of social care supported housing accommodation including for mental health and learning disabilities. In addition, there are some minor amendments needed to stay up to date with legislation and ensure coherence with other Hillingdon strategy documents.

### Headline Housing Register and Social Housing Lettings Summary Data

7. At the end of March 2024 there were 3896 households on the housing register. Two thirds of those registered were in bands A and B.

<b>Housing Register by Band at March 2024</b>						
<b>Beds</b>	<b>All</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>
Band A1 (Permanent decant)	7	3	1	2	1	0
Band A2 (Under occupier)	217	120	77	16	3	1
Band A3 (Management transfer)	46	25	4	9	8	0
<b>Band A</b>	<b>485</b>	<b>93</b>	<b>104</b>	<b>166</b>	<b>121</b>	<b>1</b>
<b>Band B</b>	<b>1791</b>	<b>313</b>	<b>551</b>	<b>743</b>	<b>183</b>	<b>1</b>
<b>Band C</b>	<b>893</b>	<b>498</b>	<b>250</b>	<b>126</b>	<b>19</b>	<b>0</b>
<b>Band D</b>	<b>457</b>	<b>175</b>	<b>162</b>	<b>89</b>	<b>31</b>	<b>0</b>
<b>Total</b>	<b>3896</b>	<b>1227</b>	<b>1149</b>	<b>1151</b>	<b>366</b>	<b>3</b>
<i>Total in Bands A or B</i>	<i>2546 (66%)</i>	<i>554 (45%)</i>	<i>737 (64%)</i>	<i>936 (81%)</i>	<i>316 (86%)</i>	<i>3 (100%)</i>

8. There is a fairly even spread of those needing one, two or three bed homes ranging from 1149 to 1151 and there are 366 requiring four bedrooms or more. The proportion of households registered in the higher bands A and B increases with bedsize need.
9. By far the most common reason for being on the housing register is overcrowding. This accounts for 1857 or 48% of those registered. The percentage is higher for larger families with overcrowding accounting for 64% of registrations for those who need 3-bedroom properties and 63% of those needing 4 or more bedrooms.
10. Between April 2023 and March 2024 there were 401 social housing lettings and a further 165 lettings that were used as shortlife temporary accommodation, giving a total 566. This compares to 636 in 2022/23.
11. The following table provides a breakdown of the social housing lettings from April 2023 to March 2024.

<b>Beds</b>	<b>All</b>	<b>1</b>	<b>2</b>	<b>4</b>	<b>4</b>
Homeless	148	61	47	29	11
Transfers	86	51	14	13	8
General Housing Register	107	82	17	7	1
Extra Care	60	60	0	0	0
<b>All Social Housing Lettings</b>	<b>401</b>	<b>254</b>	<b>78</b>	<b>49</b>	<b>20</b>
Shortlife Temporary Accommodation	165	58	58	35	14
<b>Total Lets</b>	<b>566</b>	<b>312</b>	<b>136</b>	<b>84</b>	<b>34</b>

12. A more comprehensive analysis of lettings will be provided with the final report in November and will inform an equality impact assessment.

## **Proposed changes**

### Method of Awarding Additional Priority

13. A key reason for reviewing the policy is that the priority bands have become congested, with the majority of applicants being in the higher priority groups of Bands A and B. This is not allowing for sufficient differentiation between applicants to allow for effective prioritisation.

14. The current policy awards additional priority to:

- Couples aged over 21 without children
- 10 years' continuous residency

- Working households
- Members of the British Armed Forces who have continuously resided in the borough for 10 years prior to signing up for the service and have not been dishonourably discharged.

15. For those qualifying for additional priority under the last bullet point a Band A is awarded and there are no proposals to alter this. The other 3 additional priorities are currently all awarded by moving one Band up i.e. Band D becomes C, Band C becomes B, and Band B becomes A. This has resulted in high numbers of applicants in Bands A and B.

16. Of the 3896 on the housing register, 40% have a banding enhancement due to additional priority.

<b>Band</b>	<b>Total</b>	<b>With Additional Priority</b>	<b>Without Additional Priority</b>
A1 (Decant)	7	0	7
A2 (Under-Occupation)	217	89	128
A3 (Management Transfer)	46	0	46
A	485	260	225
B	1791	1195	596
C	893	0	893
D	457	0	457
<b>Total</b>	<b>3896</b>	<b>1544</b>	<b>2352</b>

17. It is proposed that additional bands are created on the housing register so that each existing priority level is two tiered with additional priority being awarded the higher of two band levels.

18. The revised bands would be numbered 1 – 14 with each priority banding reason being two tiered to give enhanced priority to those who meet the additional priority criteria. This will enable a balanced approach in rewarding long-term residency while assisting in meeting the most pressing needs of residents and provide greater visibility of priorities.

19. It is also proposed that we reduce the additional priority categories to those below:

- 10 years' continuous residency
- Member of the British Armed Forces who have continuously resided in the borough for 10 years prior to signing up for the service and have not been dishonourably discharged.

20. The estimated impact on the housing register of making the changes is shown in the table below:



<b>Revised Bands</b>	<b>Total</b>	<b>Previously</b>
1	0	A1 (Decant) with additional priority
2	7	A1 (Decant) without additional priority
3	90	A2 (Under-Occupation) with additional priority
4	127	A2 (Under-Occupation) without additional priority
5	2	A3 (Management Transfer) with additional priority
6	44	A3 (Management Transfer) without additional priority
7	155	A with additional priority
8	70	A without
9	260	B with additional priority
10	596	B without
11	1195	C with additional priority
12	893	C without
13	0	D with additional priority
14	457	D without
<b>Total</b>	<b>3896</b>	

### Priority Groups

21. To make sure that particular priority need groups recognised by the Council are successful in achieving lettings the Band awarded has been increased from B to band 7 (Band A equivalent) for those with additional priority and band 8 (Band A equivalent) for those without. This banding will apply for vulnerable care experienced young people and for people moving on from social care supported accommodation including for mental health and learning difficulties. Band 7 & Band 8 will also be awarded for vulnerable single people moving on from homeless supported accommodation based on recommendation of a social letting from the Single Homeless Move On Panel.

### Overcrowding

22. The current social housing allocations policy allows households with a four-bedroom assessed need to be able to bid for three-bedroom properties so long as this does not result in statutory overcrowding.

23. It is proposed that we extend that further to other bed size need groups so long as it results in an improved situation for the family and does not result in statutory or severe overcrowding. This would mean that a family in a one-bedroom property that required a three-bedroom property would be able to bid and move into a two-bedroom property to relieve some of the overcrowding within the home.

Housing Register at end March 2024: Bedsize Need	Total	Main reason Overcrowding
1 bed	1227	219
2 bed	1149	665
3 bed	1151	742
4+ bed	369	231
<b>Total</b>	<b>3896</b>	<b>1857*</b>

### Other amendments

24. Other proposed amendments to the Social Housing Allocation Policy are minor and are referenced in the table below.

Section	Change
Various	The Council altered to Hillingdon Council throughout
Summary	A summary section has been included at the start of the policy to aid clarity
1.1	List of relevant legislation updated
1.2	Reference to fixed term tenancies removed as only needs to say in accordance with the Tenancy Strategy
2.1	Bullet points relating to eligibility rules updated
2.2.3	Qualifying criteria related to hardship has been more clearly worded. A previous exclusion relating to people over 60 living outside Hillingdon has been removed so that the qualification relates only in instances where there is a legal obligation. It is also clarified that an employment offer means full time employment
2.2.4	It has been clarified that for continuous residence, periods away for study that will be disregarded are for a period of 3 years rather than 3 times. Care leavers now referred to as care experienced young people throughout. Care experienced young people will be regarded as having a local connection if they live in or outside the borough as required by statutory homelessness guidance. Additional exceptions to the local connection criteria have been included for social tenants who (i) need to move to take up a job or live closer to work as required by the Right to Move regulations or (ii) have move away while being held on remand.
4.1	The list of Locata partners has been removed as it is not necessary to keep this information up to date in the Social Housing Allocation Policy.
5.1	Although those with savings of £30,000 or more are excluded under qualifying criteria, this cannot be applied where the applicant falls within a reasonable preference category. In this instance, those who have savings over £30,000 will be placed in Band 13 or 14.

5.2	Stipulates that the separation of Bands between those with or without an additional priority categorisation will apply before date order. Error corrected on example 3 regarding band date.
5.4	Information regarding help with bidding has been brought up to date with current practice and bidding cycles.
5.11	Section on Local lettings policies updated to provide greater discretion on when they may be used and provide improved readability.
6.	Reference to Lettings Plan updated in line with Section 9
9	The policy has been amended to enable the Council to produce a Lettings Plan as and when required rather than annually.
10.2, 10.3 & 10.4	Information regarding who can and who should not be included on the social housing application has been updated. This is to ensure consistency with the Tenancy Policy and Tenancy Strategy and is in line with legal advice.
11.2	Further clarity has been provided in the table of examples given relating to family composition and the number of bedrooms for which they will be considered. This follows a recommendation given during a recent Housing Ombudsman case in which the Council was successful. A paragraph has been included regarding the importance of notifying the Council of any changes.
12.1	Additional text has been included to make reference to the awarding of Band 7 via the Single Homeless Move On Panel to meet the needs of those who are particularly vulnerable. Definition of Bed & Breakfast as nightly paid accommodation added.
14	Text regarding Additional Priority has been amended to reflect the proposal for Bands to be two tiered to differentiate between those with or without additional priority as set out above under 'Method for Awarding Additional Priority'
15.1	Table showing waiting times removed and sentence added confirming that this will be published annually on the council's website.
Social Housing Allocation Summary Table	Section added to summarise Additional Priority Main table amended in line with proposals

## RESIDENT BENEFIT

By reviewing the Social Housing Allocation Policy the Council has given renewed consideration to the prioritisation of social housing allocations and provided increased clarity for residents. A comprehensive equality impact assessment and inclusive consultation process will follow.

## **BACKGROUND PAPERS**

[Consultation Draft Social Housing Allocation Policy](#)

# Appendix A

## Draft Social Housing Allocation Policy Consultation

### 1. Introduction

This paper sets out the plan for organising and undertaking the consultation process for the Social Housing Allocation Policy – July 2024.

### 2. Purpose / Objectives of the consultation

To complete a consultation process for the draft Social Housing Allocation Policy (July 2024) that will meaningfully inform the final version of the policy to be presented to Cabinet / Council.

The consultation process should:

- Be legally compliant (minimum 6-week consultation).
- Promote and raise understanding of the policy to residents, partners and other stakeholders.
- Gather valuable insight in a range of ways from a representative cross-section of residents, partners and other stakeholder to inform the final version of the policy.

### 3. Design Principles

The following principles have been used to design the consultation approach:

- To be proportionate to requirements.
- Provide 'self-serve' digital feedback options to participate in the consultation, for the convenience of residents and partners.
- Provide for easy read and inclusive consultation approaches, where required.
- Using existing networks of groups and partnerships.
- Enable opportunities for providing structured views and responses to open dialogue, where required.

### 4. Timeline

- 25<sup>th</sup> July 2024 - Cabinet approval to consult
- 5<sup>th</sup> August 2024 – Consultation commences
- 24<sup>th</sup> September 2024 – Residents' Service Select Committee (report deadline 12<sup>th</sup> September)
- 13<sup>th</sup> October 2024 – Consultation concludes
- 18<sup>th</sup> October 2024 – Analysis of consultation results
- 21<sup>st</sup> October 2024 – Draft Cabinet report circulated – with consultation findings and updated policy
- 7<sup>th</sup> November 2024 – Consultation responses and final policy presented to Cabinet.

## 5.Methodology

### Structured electronic survey questionnaire (Appendix 1)

A copy of the draft policy published on the Hillingdon Council website, with a link to an electronic survey form and an offer to provide the survey in different formats and translations, on request. See appendix 1 for a copy of the questions.

Promotion of the survey via various channels, including Hillingdon People magazine, e-newsletters, local media and the council's social media channels with a link to the survey form. Posters with a QR code link to the survey will also be placed across council buildings, libraries and housing estates.

### Partners (see appendix 2)

Writing directly to a range of partner organisations inviting their comments on the draft policy.

This will include:

- All schools, colleges, universities
- Business partners via existing networks
- Existing community groups, faith groups
- Voluntary sector networks
- Housing and support providers

### Residents

Writing directly to residents who have expressed an interest in participating in council-run surveys. Writing to all residents' associations to invite participation.

An offer to attend association meetings (or several meetings inviting representatives), if required.

### Select Committees

Attendance at Residents' Services Select Committee

## 6.Roles and Responsibilities

Ref	Name	Role	Responsibilities
1	David Harris	Web & Digital Team	Create web-page.
2	Callum Devine	Communications	To lead on the PR, social media promotion and monitor any comments via social media.
3	Marion Finney	Engagement with residents and tenants' associations	To support the design of the questionnaire, the creation of the survey tool and the analysis of results.

4	Fiona Gibbs	Engagement with faith / community groups	To use existing networks to engage with groups to promote the policy and encourage feedback.
5	Marion Finney	Engagement with residents and tenants' associations	To use existing networks to engage with groups to promote the policy and encourage feedback.
6	Nigel Cramb	Promotion to business partners	Using existing contact details, promote the policy and encourage feedback.
7	Rani Dady	Promotion to all schools and HEs and universities	To circulate the survey link to all head teachers, governors and senior leaders
8.	Debby Weller & Sachin Patel	Consult with council staff and housing associations and homelessness pathway partners	Discuss allocation policy changes in existing meeting structures and arrange specific consultation sessions

## 7. Monitoring & Tracking

Communication Method	No. of posts/emails/posters	No. of Responses
Social media posts (all channels)	2 posts on all except nextdoor which was 1 post.	By w.e 23/8/24 – 2,988 clicks on Facebook; 1,497 reach on Instagram; 49 clicks on Twitter/X; 2,204 impressions Nextdoor.
Staff emails	<ul style="list-style-type: none"> <li>14/08/24 – Tenancy Management, Housing Options, Fiona Gibbs, Rani Dady, Nigel Cramb</li> <li>19/0824 – All staff email</li> </ul>	
Resident emails	<ul style="list-style-type: none"> <li>TBC</li> </ul>	
Posters	<ul style="list-style-type: none"> <li>Libraries boroughwide</li> <li>Middx Pharmacy Group - to display across the borough.</li> <li>Sheltered Housing and</li> </ul>	

	<p>Extra Care.</p> <ul style="list-style-type: none"> <li>• Our tower block estates.</li> <li>• 55/57 noticeboards across the borough.</li> </ul>	
Online Survey		w.c 09/09/24 – 224 responses





HILLINGDON  
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**London Borough of Hillingdon**

**Social Housing Allocation Policy**

July 2024

Consultation Draft

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**SUMMARY OF HILLINGDON’S SOCIAL HOUSING ALLOCATION POLICY (NEW SECTION)**

1. This policy document sets out how we make decisions about the allocation of council homes for rent in Hillingdon and the allocation of housing association homes where the council has nomination rights. This summary section is intended to provide a reasonably short and accessible explanation of the policy including the priorities for allocations. The full policy text is set out after the summary and should be referred to in order to fully understand how the policy operates.
2. Social housing is a limited resource, so it is important that we have an open, fair and transparent scheme setting out how we allocate social housing and the procedures to be followed. This is a legal requirement for the council.
3. There are, in the region of 18,000 council or housing association homes for rent in Hillingdon, making up about 16% of housing in the borough. There are roughly 400 to 450 social housing properties available to let each year in what we refer to as general needs homes and in sheltered and extra care housing. At the end of March 2024 there were 3,896 households on the Housing Register in Hillingdon. The housing register is split into different bands depending on the level of priority awarded under the policy. Shown below is the average and the longest amount of time that those in the highest bands on the housing register currently wait before an allocation is made. As this is based only on those that secure an offer, many other households wait considerably longer in lower bands and may never secure an offer of even a viewing.

4.

	Average Wait	Longest Wait
Sheltered accommodation	19 months	3 years
Studio	33 months	33 months
1 bedroom	10 months	27 months
2 bedroom flat or maisonette	16 months	4 years
2 bedroom house	18 months	32 months
3 bedroom flat or maisonette	19 months	19 months
3 bedroom house	4 years	6 years
4 bedroom house	4 years	6 years

5. The objectives of our Social Housing Allocation Policy are to:
  - Provide a fair and transparent system by which people are prioritised for social housing
  - Help those most in housing need
  - Reward residents with a long attachment to the borough
  - Make best use of Hillingdon’s social housing stock
  - Promote the development of sustainable mixed communities

**Eligibility and qualification to join the housing register**

6. To be considered for an allocation of social housing you must be eligible for and

qualify for an allocation. Eligibility is about where you usually live and your immigration status. The rules for this are set by the national government and are the same for all local authorities in England. Further details are provided in section 2.

7. Local authorities can largely set their own rules for who qualifies for social housing, but there are some groups of people that must be included. Housing legislation requires every local authority allocation scheme in England to ensure 'reasonable preference' for social housing allocations is given to certain categories of applicants. This means that they must be given a reasonable level of priority, and it covers the following groups:
  - Those who are homeless or owed certain homelessness duties
  - Insanitary or overcrowded housing or unsatisfactory housing conditions
  - A need to move on medical or welfare grounds
  - People who need to move to a particular locality to avoid hardship to themselves or others
8. Local authorities must also give 'additional preference' to applications from certain serving and ex-members of the armed forces (and reserve forces) who fall within the reasonable preference categories.
9. Guidance that the council is legally obliged to take notice of, also encourages reasonable preference to be given to people who are homeless and require urgent rehousing as a result of domestic abuse and to give reasonable preference to foster carers.
10. Hillingdon Council's own qualification rules restrict which households can join the housing register. Including restrictions helps to ensure that the council's priorities for social housing allocations are clear and that other households are not given false hope of a council home. The following types of households do not qualify to join the housing register:
  - Those that do not have a clearly demonstrated housing need.
  - Those that have sufficient financial resources.
  - Households that do not currently live in the borough
  - Households who have not been continuously living in the borough for at least 10 years
11. There are some exceptions where households in these circumstances can still qualify, including if they fall within the reasonable preference groups. In certain very specific instances, the requirement for 10 years residency could be reduced to 5 years. See section 2.2.5

### **Making an application**

12. Hillingdon residents over the age of 18 can apply to join the housing register. Applicants need to register via Locata Housing Services who operate a Choice Based Lettings Scheme for Hillingdon Council and various other social housing providers. Applicants are allocated a priority band and within each band, priority is determined in date order. Vacant council and housing association homes are

advertised on the [West London Locata website](#) and applicants are entitled to bid for up to 3 properties in each week . Some properties will have restrictions limiting them to certain types of households. The council can provide help with bidding for people who are not able to do this online. Hillingdon residents are entitled to bid for properties advertised in the “Hillingdon” section of Locata and the “cross borough” section as well as properties advertised by several housing associations that operate in Hillingdon.

13. Once bidding has closed a shortlist is created for each property and will place residents in a band and then priority date order for all suitable bids. Those at the top of the list are contacted to view the property. If they accept the property they are invited to sign the tenancy. If the property is not accepted it is offered to the next household on the shortlist going down the list until it is accepted.
14. The length of time you have to wait is affected by the choices you make on your housing application. Those prepared to consider a broad range of areas and property types are likely to wait for less time. Details of properties allocated are available at [www.Locata.org](http://www.Locata.org) including the priority band and registration date of the successful bidder.
15. On some occasions a property may be sensitively allocated in the interest of nearby tenants and residents that have experienced harassment, noise nuisance or un-tenant like behaviour over an excessive period. These properties will be clearly marked on the advert and additional verification checks into any potential incoming tenant will be completed.
16. On new developments or acquisitions, the Council may agree a local lettings policy for council homes or those owned by another social housing provider. This can help ensure balanced sustainable communities, mitigate management problems and address specific council aims for the development.

### Priority Banding

17. Hillingdon Council has previously operated a scheme with just four bands A to D and with some priorities set out within Band A. At the beginning of April 2024, there were 755 households in Band A. We are increasing the number of Bands to 14 so that there is a greater spread of the Bands across the register and greater clarity regarding priorities for rehousing. Within each band a priority date order will continue to apply.

Band 1	This is the highest priority band and is only awarded to households who are being decanted from their existing home and qualify for additional priority due to having 10 years' residence in Hillingdon
Band 2	As Band 1 but without 10 years' residence
Band 3	This band is for under occupying social tenants moving to a property with fewer bedrooms and that qualify for additional priority due to 10 years' residence
Band 4	As Band 3 but without 10 years' residence
Band 5	This band is for households for which a management transfer has been agreed due to exceptional circumstances and that qualify for additional priority due to 10 years' residence

Band 6	As Band 5 but without 10 years' residence
Band 7	This band is for households with an emergency and very severe housing need other than the needs covered by Bands 1 to 6 and that qualify for additional priority due to 10 years' residence. For full detail see table at Appendix 1
Band 8	As Band 7 but without 10 years' residence
Band 9	This band is for household with an urgent need to move and that qualify for additional priority due to 10 years' residence. For full detail see table at Appendix 1
Band 10	As Band 9 but without 10 years' residence
Band 11	This band is for households with an identified need to move and that qualify for additional priority due to 10 years' residence
Band 12	As Band 11 but without 10 years' residence
Band 13	Homeless applicants without 10 years' residence who do not own a property or have savings over £30,000
Band 14	Applicants within a Reasonable Preference category who own a property or have savings over £30,000

### Offers of Accommodation

18. In certain circumstances a direct allocation may be made outside of the choice based lettings scheme. A list of these circumstances is included at section 6.
19. If there is a clear reason why the specific property would not be an appropriate match for the specific applicant, the offer will be withdrawn, and the right of the applicant will not be affected. If, however, a reasonable offer is refused, this may have important consequences including discharge of a council duty, eviction proceedings and loss of priority banding. Further detail is shown in section 7.3.
20. Joining the housing register does not guarantee an offer of accommodation. Many more people are on the register than we will be able to offer accommodation. We will also carry out checks before an offer is made to make sure that the circumstances of your household are as you have been assessed and that you have not behaved in a way that would make you unsuitable as a tenant. These include checking against eligibility and qualifying criteria; rent and council tax arrears and serious anti-social behaviour. A full list of verification checks is included at section 8.
21. To achieve the right balance of allocations to different groups and to manage the cost of homelessness the Council may set out requirements in a Lettings Plan. To achieve allocation targets the Council reserves the right to enhance access by advertising or directly allocating some properties to specific groups.
22. In cases where specific action has been taken to release homes, the resulting vacancies will be allocated to particular groups. For instance, homes recovered as a result of fraud activity may be allocated to homeless households and homes released by under occupiers allocated to overcrowded households.
23. Enquiries about applications may be made at any time to guard against misrepresentation and fraud. Checks may involve cross referencing information provided by applicants with other data that the Council holds.



## **The applicants' household and number of bedrooms**

24. The appropriate size of accommodation to offer will depend on the composition of the household. Because someone is living with you currently and is a member of your family, it does not mean that the Council will treat them as a member of your household for the purpose of this Allocation Policy. The applicants' household includes partners, children under 18, children over 18 studying for their first degree (or similar), dependent relatives and live-in carers (please refer to section 11.2 for full details).
25. The Council must be notified in writing of any change in circumstances that will or might affect your priority for housing such as changes in the household members or moves to alternative properties. Every applicant will be asked to renew their application annually. This will include a request to provide any information on changes in circumstances. If not renewed within 28 days the application may be cancelled without further notice.
26. Applicants can ask for a review of any decision made under the terms of this policy. Requests must be made in writing within 21 days of a decision.
27. The size of accommodation for which applicants will be considered is based on the 'bedroom standard' as used by the English Housing Survey to produce estimates of overcrowding. The Secretary of State takes the view that the bedroom standard is an appropriate measure of overcrowding for allocation purposes and recommends that all housing authorities adopt this as a minimum. A separate bedroom is allocated to
- each married or cohabiting couple,
  - any other person aged 21 or over,
  - each pair of adolescents aged 10-20 of the same sex,
  - and each pair of children under 10.
  - Any unpaired person aged 10-20 is paired, if possible, with a child under 10 of the same sex, or, if that is not possible, he or she is given a separate bedroom, as is any unpaired child under 10.
  - This standard is then compared with the actual number of bedrooms available for the sole use of the household. Examples of this in practice are provided in section 11.2.
28. In calculating the number of bedrooms available in a property the Council will treat every habitable room as a bedroom except kitchens, bathrooms and one room for use as a living room.
29. A management transfer due to extreme circumstance will only be to the same size accommodation regardless of a housing need for a larger home.
30. Where there is a shared residency arrangement, children are only considered to need one home of adequate size.

## **Reasonable Preference Groups, Local Priorities and Additional Priorities**

31. The table provides more detail regarding the Band which applies in different circumstances. The full banding breakdown can be found in a summary table at end of the policy.

<b><u>Reasonable Preference Groups</u></b>	Band with 10 years' residency	Band without 10 years' residency
The council will maintain the protection provided by the statutory reasonable preference criteria in order to ensure that priority for social housing goes to those in the greatest need.		
<b>Homeless households</b>		
In temporary accommodation and landlord wants property back and the Council cannot find alternative temporary accommodation	7	13
Placed in nightly paid temporary accommodation	9	13
In other forms of temporary accommodation or has no accommodation	11	13
Move on to social housing approved by Homeless Move on Panel	7	7
Households living in insanitary and unsatisfactory conditions		
Closing Order issued, i.e. property is unfit for human habitation and there is no alternative measure to render the property fit as advised by Environmental Health Officer	7	8
Where emergency re-housing is essential, for example, compulsory purchase order (CPO) is issued	7	8
Household with dependent children living in unsanitary or unsatisfactory housing that cannot be addressed by Environmental Health action.	9	10
<b>Overcrowded households</b>		
Statutorily overcrowded as defined in Part X of Housing Act 1985	9	10
Severely overcrowded – where a household is lacking 2 or more bedrooms	9	10
Other overcrowded households lacking 1 bedroom.	11	12
<b>Medical grounds</b>		
Emergency Medical: the applicant or a member of the applicant's household has a life threatening condition that is seriously affected by their housing.	7	8
Medical Hardship: the applicant's current housing conditions are having a major adverse effect on the medical condition of the applicant or a member of the applicant's household	9	10
Medical Need: the applicant's current housing conditions are having a moderate or variable adverse effect on the medical condition of the applicant or a member of the applicant's household	11	12
<b>Welfare grounds</b>		
Homeless persons fleeing domestic abuse with an	9	10

urgent need for rehousing		
Care experienced young people approved by the care experienced transition panel	7	8
Fostering and adoption	7	8
<b>Local Priorities</b>		
In addition to statutory reasonable preference groups, the council will provide housing assistance to certain groups who meet local needs and priorities		
Members of the British Armed Forces discharged within the last 5 years	7	8
Specific schemes that Hillingdon Council participates in such as the national witness mobility scheme and schemes concerned with gang violence and with domestic abuse	7	7
Under-occupation	3	4
Regeneration/essential/urgent decant	1	2
Other decant	9	10
Management Transfer	5	6
Reciprocal requests where there is an imminent personal risk	7	7
Ex-tenant discharged from an institution	9	10
Relinquishing more than one property	9	10
Service tenants where there is a contractual obligation	7	8
<b>Additional Priority</b>		
Additional priority is awarded in order to determine priorities between people in the reasonable and local preference groups.		
10 years' residency	1 3	2 4
Banding enhancement varies depending on other household circumstances	5 7 9	6 8 10
<b>Sheltered Housing</b>		
Must meet age criteria and bid for sheltered housing	11	12

### Encouraging personal responsibility

32. Homeless households that have been living in temporary accommodation longer than other households with the same bedsize need and priority banding level, will be made one direct offer of accommodation. If unreasonably refused the council will discharge its homelessness duty and withdraw any temporary accommodation. Average waiting times will be published annually on the council's website.

33. Refusal of more than 3 reasonable offers will result in 6 months suspension from bidding.

### Specialist accommodation

34. Disabled adapted properties will be advertised and allocated to a person assessed

as needing that particular type of accommodation ahead of other applicants in a higher band or with an earlier priority date. In exceptional circumstances a suitable property may be directly allocated.

35. Hillingdon Council has a number of properties restricted for those aged over 55 or over 60. Applicants can bid for these properties in the normal way if the main applicant meets the age criteria. Partners under 55 or 60 are permitted to live at the property but cannot be a joint tenant until they reach the minimum age for the accommodation.
36. If a couple apply for sheltered housing, both must generally be over 60 although some housing associations will accept applicants aged 55. They can only bid for sheltered housing unless they have other identified needs.
37. Extra care housing is allocated outside of the Locata choice based lettings scheme by a panel of representatives from Housing, Health and Social Services.
38. Traveller pitches are allocated in the same way as general needs properties.

#### **Mobility within and across the Council's Boundary**

39. There are schemes that enable lettings in other local authority areas, including by mutual exchange. These operate outside of this allocation policy. Details are included in section 17.2.

## 1. INTRODUCTION (ORIGINAL POLICY START)

The Housing Allocation Scheme describes how Hillingdon Council assesses applications for housing, prioritises each application and decides which applicant will be offered (allocated) Council and Housing Association housing.

The Housing Allocation Scheme covers housing in Hillingdon owned by Hillingdon Council or by Housing Associations that have entered into a nominations agreement with Hillingdon Council. This is called *social housing*.

Hillingdon Council receives many enquiries every year from people looking to rent a home in the borough. Because Hillingdon only has a limited amount of social housing available to rent, the main purpose of this scheme is to explain who will be allocated housing and why.

### 1.1 Legal Context

The Housing Allocation Scheme sits within a legal framework which is summarised below.

The Housing Act 1996 (as amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017) requires local authorities to make all allocations and nominations in accordance with an Allocation Scheme. A summary of the Allocation Scheme must be published and made available free of charge to any person who asks for a copy.

This document is available on Hillingdon Council's website [www.hillingdon.gov.uk](http://www.hillingdon.gov.uk) and paper copies will be provided on request.

The Housing Act 1996 (as amended) requires local authorities to give reasonable preference in their allocations policies to people with high levels of assessed housing need. The main groups are:

- People who are homeless as defined by the Housing Act 1996, Part 7
- People who the council has a legal duty to provide housing to (under section 190(2), 193(2) or 195(2) (or under section 65(2) or 68(2) of the Housing Act 1985) or who are occupying accommodation secured by any such authority under section 192(3))
- People occupying insanitary or overcrowded housing, or who are otherwise living in unsatisfactory conditions,
- People who need to move on medical or welfare grounds (including any grounds relevant to a disability); and
- People who will suffer hardship to themselves or to others if they are unable to move to a particular locality or district.

The Act also requires local authorities to state within the policy what its position is on offering applicants a choice of housing accommodation or offering them the opportunity to express preference about the housing accommodation to be allocated to them. Our policy on choice is described below in Section 4.

This Housing Allocation Scheme has been formulated with regard to the law and regulatory requirements, including:

- Housing Act 1985
- Housing Act 1996
- Homelessness Act 2002
- Homelessness Reduction Act 2017
- Housing and Regeneration Act 2008
- Localism Act 2011
- Armed Forces Act 2006
- Asylum and Immigration Act 1996
- Immigration and Asylum Act 1999
- Children Act 2004
- Equality Act 2010
- Data Protection Act 2018
- European Union (Withdrawal Agreement) Act 2020
- Homelessness Code of Guidance for Local Authorities 2018
- Statutory Guidance
- The London Housing Strategy
- Tenancy Strategy
- Housing Strategy
- Allocation of Housing and Homelessness (Eligibility) (England) Regulations 2006
- Allocation of Accommodation: Code of Guidance for Housing Authorities June 2012, last updated October 2023
- Providing social housing for local people, December 2013
- Right to Move and social housing allocations, March 2015
- Improving access to social housing for victims of domestic abuse, November 2018
- Improving access to social housing for members of the Armed Forces, June 2020
- The regulatory standards for registered providers of social housing in England:

## 1.2 Aims of the Allocation Policy

The Allocation Scheme is designed to meet all legal requirements and to support and contribute towards Hillingdon Council's wider objective of putting residents first. Hillingdon Council is also committed to preventing homelessness and the Allocation Scheme focuses on supporting residents to actively pursue suitable alternatives to avoid becoming homeless.

The key objectives of this Allocation Scheme are to:

- Provide a fair and transparent system by which people are prioritised for social housing.
- Help those most in housing need.
- Reward residents with a long attachment to the borough
- ~~Encourage residents to access employment and training~~
- Make best use of Hillingdon's social housing stock.

- Promote the development of sustainable mixed communities.

This policy has considered:

- Hillingdon Council's statutory obligation to provide Reasonable Preference to certain categories of applicants set down by law
- The general and specific statutory discretions Hillingdon Council can exercise when allocating housing in support of its Council Strategy.
- Hillingdon Council's statutory discretion to grant 'additional preference' and/or to determine priority between applicants with Reasonable Preference

The social housing allocation system will be supported by a housing options approach giving applicants realistic advice and promoting other housing options.

Hillingdon Council will register eligible applicants who qualify for the reasonable preference criteria and certain groups who meet local priority. In addition, Hillingdon Council will ensure that greater priority through 'additional preference' is given to applicants who have a long attachment to the borough, and members of the British Armed Forces.

In addition, Hillingdon Council will continue to use the private rented sector both within the borough and outside it to meet its statutory housing obligations. It will use the private rented sector, as far as possible, to discharge its homelessness duty.

Where Hillingdon Council believes that potential applicants are able to access market housing, that is, private rented or low cost or market home ownership, Hillingdon Council will provide advice as necessary.

Hillingdon Council will take into account the impact of welfare policy which places a ceiling on the amount of cash benefits a household will be able to receive. In order to allocate a home, a household's current and future ability to meet the rent and associated costs of running a home will be taken into account.

Tenancies for Hillingdon Council homes are allocated according to Hillingdon Councils Tenancy strategy. Other Registered Providers have to take account of the Councils Tenancy Strategy when setting their own policies.

### **1.3 What is not included in the allocation policy**

The following are not allocations under this scheme:

- Succeeding to a tenancy under S89 Housing Act 1985
- A mutual exchange with another tenant
- Assigning a tenancy
- Transferring a tenancy in accordance with a court order under Family Law provisions or under the Civil Partnership Act 2004
- An introductory tenant becoming a secure tenant
- Provision of temporary accommodation in discharge of any homelessness duty or power

## **2. ELIGIBILITY AND QUALIFICATION FOR HOUSING**

### **2.1 Eligibility Rules**

The first assessment Hillingdon Council makes when an application is received is whether the applicant is eligible for social housing. This depends on where the applicant normally lives (“habitual residence”) and their “immigration status”.

Eligibility for social housing is assessed when an applicant first applies and it is looked at again when they are being verified for an offer of accommodation.

A person is not eligible if they are:

- subject to immigration control (with limited exceptions)
- classed as an ineligible person from abroad
- A person not habitually resident in the United Kingdom or required to leave the UK by the Secretary of State.

Detailed information on eligibility for housing is set out in Annex 1.

### **2.2 Qualification Rules**

The second assessment the council makes is whether an applicant qualifies to go on the housing register. The Localism Act 2011 has given new freedoms for local authorities to determine who can join the housing register. The Council has a number of qualification rules in addition to the provision on eligibility in respect of persons from abroad set out in 2.1.

This is because the council:

- Wants to make sure a more focused housing register is operated which better reflects local circumstances and can be understood more readily by local people
- Believes that social housing should be available to people that cannot afford to buy or rent a home privately.
- Wants to make sure housing policies benefit people that live in Hillingdon.

The following sections explain the qualification rules:

#### **2.2.1 Households with no demonstrable housing need will not qualify to join the housing register.**

The Council will not maintain a housing register for those households that it is unable to help access a council or housing association home. This means applicants who are considered not to have a housing need will not qualify to join the housing register.

It will help in managing unrealistic expectations by excluding people with little or no prospect of being allocated accommodation. They will be signposted and given



relevant information and advice, including through the targeted housing options website at [www.locata.org.uk/hillingdon](http://www.locata.org.uk/hillingdon).

### Exception

People aged over 60 who would benefit from sheltered housing. However, they will be made an offer of sheltered accommodation after other households meeting the housing need criteria.

### **2.2.2 Household with sufficient financial resources will not qualify to join the housing register.**

People with sufficient combined household income, savings and assets will not qualify to join the housing register:

- Any household who owns or has an interest in a property.
- Any household with a gross income at or above the level required for low cost home ownership. The current income level (as at June 2024) is £90,000.00. This income will be reviewed on an annual basis and adjusted to reflect the size of the household and market conditions.
- Any household with savings/assets of more than £30,000 as they will be deemed to have enough financial resources to rent in the private sector. Deliberate disposal of assets in order to become eligible for an allocation will not be tolerated.

All applicants and prospective new tenants will be required to supply evidence of their financial income and resources. Where applicants are not able to show current entitlement to income support, housing benefit, council tax benefit (and universal credit), verification of income and savings will be required, at the point of being offered accommodation and may be requested upon joining the housing register.

Where applicants have resources considered sufficient to access low cost home ownership within the thresholds set above, they will normally be offered advice or assistance as they are considered to have the income to meet their own housing requirements. Advice on home ownership and private sector renting options will be offered including the opportunities to join the Council's low cost home ownership register.

### Exceptions

- Members of the British Armed Forces who receive lump sum payments as compensation for an injury or disability sustained on active service.
- Members of the British Armed Forces or their former partners who remain in residence following the expiry of a notice to vacate Service Families Accommodation may be charged mesne profits for trespass and accordingly accrue a mesne profit debt. In taking into account rent arrears or a housing debt in determining whether to allow qualification to join the housing register, the Council may treat the accrual of a mesne profit debt by a Member of the British Armed Forces or their former partner sympathetically.
- Persons who fall within the reasonable preference groups.
- Any household to be placed in extra care housing will not be subject to the savings/assets cap of £30,000.

Households who do not currently live in the borough and fall within the reasonable preference groups may qualify to join the housing register under hardship grounds. Hardship grounds include:

- The need to move to take up a confirmed offer of full time employment
- To give or receive care or support from/to a resident in the borough (see section 12.5.4)

#### **2.2.4 Households who have not been continuously living in the borough for at least 10 years will not qualify to join the housing register.**

Applicants will need to demonstrate a local connection with Hillingdon. Local connection within the terms of this scheme will normally mean that an applicant has lived in Hillingdon, through their own choice, for a minimum of 10 years up to and including the date of their application, or the date on which a decision is made on their application whichever is later.

For purposes of continuous residence, children spending time away from home for education due to periods of study such as at university, and people who have moved away for up to 3 times-years due to the requirements of their job will be disregarded. Secure, introductory or flexible tenants of Hillingdon Council and care experienced young people housed in or outside the borough will be considered as having a local connection with Hillingdon.

People will also be considered as having a local connection with Hillingdon when they are placed in the borough of Hillingdon in temporary accommodation in accordance with sections 190(2), 193(2), 195(2) or who are occupying accommodation secured by any local authority under section 192(3).

Exception:

- People who have served in HM Forces in the last 5 years
- People who are aged over 60 and currently live in the borough, but have done so for less than ten years. This exception applies for lettings in sheltered housing only and as a lower priority than other households who meet the 10 year residency criteria.
- People who are under-occupying their current social housing and are currently resident in the borough.
- Emergency cases where homes are damaged by fire, flood or other disaster if it is not possible to repair the existing home, or if any work to repair is to take such a long period of time that there will be serious disruption to family life.
- Cases nominated under the Police Witness Protection Scheme or other similar schemes that the Council has agreed to be part of.
- Statutorily homeless persons and other persons who fall within the statutory reasonable preference groups (see paragraph 12 below).
- Households who need to move to the Borough to avoid hardship. Hardship grounds

include:

- The need to move to take up a confirmed offer of permanent employment
  - The need to move to specialist facilities where they receive care but live outside the Borough
  - The need to move to receive or give care/support (meaning higher care costs or even the use of residential care for those who cannot move)
- People who are living in a refuge or other form of safe temporary accommodation in the borough having escaped domestic abuse in another local authority area.
  - Children spending time away from home due to periods of study such as at university.
  - People who have moved away for up to 3 years due to the requirements of their job.
  - People to whom paragraph 2.2.5 applies.
  - Social tenants who need to move to take up a job or live closer to work (Right to Move Regulations).
  - People who have moved away while being held on remand.

### **2.2.5 Exception for certain Irish Traveller, Romany Gypsy or non-UK national households**

Compliant with the judgment of the Court of Appeal in R(Ward & Ors) v LB Hillingdon, Equality and Human Rights Commission intervening [2019] EWCA Civ 692, this paragraph applies to an applicant whose household is either Irish Traveller / Romany Gypsy or non-UK national with refugee status in the UK and who would qualify under this section for inclusion on the housing register, or once included be entitled under section 14.3 to additional preference, but for their inability to demonstrate at least 10 years' residence in Hillingdon. If, in the opinion of the Council, such inability is the result of their racial origin or related circumstances or lifestyle, the residence requirement will in the case of each provision be reduced from 10 years to 5 years provided the applicant can demonstrate to the Council's reasonable satisfaction that they have for the whole or substantial part of that period made a community contribution such as helping borough residents, undertaking paid, unpaid or voluntary work in the borough or being a recognised carer for an elderly or disabled adult or child, or other special reason to be decided on a case by case basis by the Council.

### **3. WHO CAN MAKE AN APPLICATION**

Hillingdon residents who are over 18 years old can apply to join the housing register through the Locata website at [www.locata.org.uk](http://www.locata.org.uk).

The council intends to ensure that all successful applicants have reasonable preference. In addition, the council has used its statutory discretion to determine groups of households who will be eligible for housing allocation.

The council will also give 'additional preference' to applicants who have a local connection (long attachment to the borough), .

The Council will not normally grant a tenancy to anyone under the age of 18 years unless another adult is prepared to act as their guarantor and agrees to cover the rent or any arrears. In exceptional circumstances<sup>5</sup>, the council can grant permission to occupy a property to an applicant under-18 years by way of something known as an equitable agreement.

Capacity – For an applicant to become a tenant of the Council and enter into a tenancy agreement, they must have the mental capacity to understand the contract. If an applicant does not have the capacity to understand the contract, an application should be made to the Court of Protection for the tenancy agreement to be signed on their behalf.

#### **4. STATEMENT ON CHOICE**

The council operates a Choice Based Lettings Scheme through a central lettings agency known as 'Locata'. Council, Housing Association properties and travellers' site pitches in Hillingdon available at social and affordable rent are let through the scheme.

Households who are eligible to join the housing register are required to use the choice based lettings scheme (Locata) to obtain a new home. People who apply for housing through the council are divided into two main groups:

- **Homeseekers** are households who are not currently social housing tenants but have applied for social housing. Households living in temporary accommodation are included in this group.
- **Transfers** are existing Council and Housing Association tenants who want to move to another social housing property.

##### **4.1 Locata Housing Services - the central lettings agency**

Locata Housing Services (LHS) Ltd is a central lettings agency set up by West London local authorities and housing associations including Hillingdon Council to provide the computer program to manage the letting of available vacancies.

## 5. HOW THE CHOICE BASED LETTINGS SCHEME WORKS

### 5.1 Priority Banding

Housing need is determined by assessing the current housing circumstances of applicants. A priority 'band' is then allocated according to the urgency of the housing need. There are fourteen priority bands as follows:

Band 1	This is the highest priority band and is only awarded to households who are being decanted from their existing home and qualify for additional priority due to having 10 years' residence in Hillingdon
Band 2	As Band 1 but without 10 years' residence
Band 3	This band is for under occupying social tenants moving to a property with fewer bedrooms and that qualify for additional priority due to 10 years' residence
Band 4	As Band 3 but without 10 years' residence
Band 5	This band is for households for which a management transfer has been agreed due to exceptional circumstances and that qualify for additional priority due to 10 years' residence
Band 6	As Band 5 but without 10 years' residence
Band 7	This band is for households with an emergency and very severe housing need other than the needs covered by Bands 1 to 6 and that qualify for additional priority due to 10 years' residence
Band 8	As Band 7 but without 10 years' residence
Band 9	This band is for households with an urgent need to move and that qualify for additional priority due to 10 years' residence
Band 10	As Band 9 but without 10 years' residence
Band 11	This band is for households with an identified need to move and that qualify for additional priority due to 10 years' residence
Band 12	As Band 11 but without 10 years' residence
Band 13	Homeless applicants without 10 years' residence who do not own a property or have savings over £30,000
Band 14	Applicants within a Reasonable Preference category who own or have an interest in a property or have savings over £30,000

~~Band A - This is the highest priority band and is only awarded to households with an emergency and very severe housing need.~~

~~Band B - This is the second highest band and is awarded to households with an urgent need to move.~~

~~Band C - This is the third highest band and is awarded to households with an identified need to move.~~

~~Band D – Homelessness applicants who do not satisfy the 10 year continuous Residence Rule.~~

If following an assessment, it is determined that an applicant has no housing need, they cannot join the housing register, they will be given advice and assistance on other housing options, for example, renting from a private landlord or applying to an intermediate rent or low cost home ownership scheme which will be available on the 'Targeted housing option' website at [www.locata.org.uk/hillingdon](http://www.locata.org.uk/hillingdon).

## **5.2 Priority Dates**

As the level of need within each 'band' is broadly similar, it is fairest to make an offer of social housing to the applicant that has been waiting the longest in that 'band'. This is known as a priority date order. The priority date is awarded either on the date of the original application or on the date the council is notified of a change in circumstances.

### Moving up a 'Band'

The priority date is the date the higher priority is awarded.

### Moving Down a 'Band'

New priority date reverts to the date that applied when the applicant was previously in that 'band' OR any earlier date when they were in a higher band. The principle is that when moving down, their priority date should be the earliest date that they were in the new lower band, or in a higher band.

If the applicant has been suitably housed for any of the time, the new band date cannot be any earlier than the date they were subsequently assessed as a priority band..

### Examples of priority date system:

<b>Example 1</b>	<b>Priority Date</b>
Household applies to register in January and is adequately housed.	None
In February household is awarded band 9	February
In March household is awarded band 7	March
In April household is downgraded to band 11	February

<b>Example 2</b>	<b>Priority Date</b>
Household applies to register in January and is awarded band 11	January
In February household is awarded band 7	February
In April household is downgraded to band 9	February

<b>Example 3</b>	<b>Priority</b>
In April household is awarded medical priority band 11	April
In May household is awarded urgent medical priority band 9	May
In June medical priority reduced again – band 11	April
In June household is awarded emergency medical priority – band 7	June
In August new medical assessment – band 9	May

### 5.3 Property Advertising

Vacant council and housing association properties are advertised on the West London Locata website ([www.locata.org.uk](http://www.locata.org.uk)) to people assessed as having housing need. The majority of council and housing association rented homes to which the council has nomination rights are advertised and let through this scheme. Available properties are advertised as they become ready for letting.

In choosing which property to bid for, an applicant should look at the details as some properties advertised may have restrictions such as:

- Properties subject to a sensitive let (See section 5.9)
- Properties subject to a local lettings plan (see section 5.10)
- Properties adapted for disabled applicants (See section 16.1)
- Properties designated for people over a certain age e.g. older people accommodation or sheltered housing (See sections 16.2, 16.3 & 16.4).
- Properties designated to a particular group of households, for

example, homeseekers (H) or transfers (T) only.

Where restrictions are applied, details will be given on the advert.

Circumstances in which direct offers may be made by by-passing the Locata process are set out in section 6.

#### **5.4 Bidding for a property (expressing an interest)**

Hillingdon residents are entitled to bid for properties advertised in the “Hillingdon” section of Locata and the “cross borough” section. In addition, Hillingdon residents can bid for properties advertised by several housing associations that have social rented accommodation in the borough. The housing associations always give priority to applicants who are registered with them directly, so it is advantageous for Hillingdon applicants who are interested in housing association properties to register directly with each provider as well.

Each household may bid for up to 3 properties in each week.

- If a property is designated for a specific type of household, only those who match the household type will be eligible to bid for that property
- Any bids must be placed before the deadline closes
- The applicant’s household must match the advert specification, for example, the household must not have more or less household members than the number specified on the property label
- The applicant must satisfy the age requirement on the property label where applicable
- The applicant must satisfy the mobility level specified on the property label.

#### **Help with bidding:**

A detailed guide of how to bid for properties is sent out to all new applicants when their application to join the register is approved.

The Council can help vulnerable applicants, who have no support mechanisms **to bid via automatic bidding**. For example, older, people with a sensory disability and people with no or low literacy or English comprehension. Such applicants can self refer or referrals can be made on their behalf by GPs, an MP, and Councillor etc.

If households are not engaging in the process or are considered to be unreasonably refusing properties or not attending viewings, this service can be withdrawn.

Other support agencies or social workers can also bid on behalf of an applicant that they are supporting. Training can be provided to such agencies if required.

There are two types of service available:

- Automatic Bidding - The applicant specifies the area and type of property they are interested in and staff can automatically place bids on up to 3 properties matching their description every week.
- Assisted Bidding - The applicant can contact our customer contact centre each week when properties are advertised and get help with making a choice



- on the property they are interested in and/or talk through the process with them by supporting them to place their bids.

## **5.5 Short-listing**

Once bidding has closed, all households that placed a bid and are eligible for that property are placed into priority band and date order. This is called the shortlist.

If a property has been advertised with preference for a specific group of applicants, bids from these households will be prioritised above all other bands. Bids placed from households within the specific priority group will still be short listed according to their band and priority date as above. Applicants will not be short listed or offered a property if they already have a live offer on another property.

The Council will only let properties in high risk buildings to applicants who can demonstrate that they are able to self-evacuate from the building, unaided and within a reasonable time frame, on being ordered to do so by the fire and rescue services.

## **5.6 Offers of accommodation:**

The applicants at the top of the shortlist for a property are contacted by the housing provider and offered an appointment to view the property. At the viewing the applicants have a chance to look around the property and ask any questions of the landlord.

If the household offered the property accepts it, they are formally invited to sign for the tenancy. If the household offered the property refuses the property, it is offered to the next household until such time as the property is accepted. If no one on the shortlist within the priority bands accepts the property, the property is either re-advertised or directly allocated to another household.

If there are more than one successful bidders for a property, the offer is made to the applicant with the longest waiting time (known as priority date).

## **5.7 The effect of choices on waiting times:**

The length of time you have to wait before you get an offer is affected by the choices you make on your housing application. If you choose an area or a type and size of property that rarely becomes available to offer, you will face a much longer wait than an applicant who is prepared to consider a broad range of areas and types of property.

We will assist you in making an informed choice by providing information on property availability and average waiting times. This information is published on the council's website.

## **5.8 Feedback on let properties**

Details of every property let in Hillingdon are available at [www.locata.org](http://www.locata.org). The

website shows the number of households that bid for each property, as well as the priority band and registration date of the successful bidder.

There is also feedback on all properties let through Locata in the Freesheet archive of the Locata Home website. The feedback enables applicants to gauge the scarcity and popularity of different areas and property types, to be able to judge how long they might have to wait to be re-housed, and therefore exercise informed choice.

## 5.9 Ringfenced lettings

In cases where specific action has been taken to release homes, the resulting vacancies will be made available to particular client groups. For example:

- Homes recovered due to fraud activity, will be offered to accepted homeless households in temporary accommodation.
- Homes released by under-occupying households will be offered to overcrowded households in a chain of lettings.

## 5.10 Sensitive lettings

On occasions it is in the interest of residents and tenants that an individual property is let sensitively in light of the experience of neighboring tenants. Where a request for a sensitive let is sought, this will be considered.

Sensitive lets will only be agreed where it can be demonstrated that:

- The neighbouring tenants have experienced either harassment, noise nuisance or un-tenant like behavior over a period of time or of an excessive nature and
- Incidents have been recorded and
- Action has been taken by the landlord or
- There is a public protection issue that must be managed.

## 5.11 Local lettings policies

On new developments or acquisitions, the Council ~~usually may~~ agrees a local lettings policy for the new or newly acquired council homes or with the another Provider (mainly Registered Providers) that is building or acquiring the ~~new~~ social housing. ~~The A~~ local lettings policy can ensures that there is a balanced sd mix of social tenants and help to mitigates any potential management problems and achieve specific council aims for the development...at a later date. To ensure the balance is achieved, the Council may bypass applicants who have placed bids for the property. A number of factors may be considered including:

~~A number of factors are considered which includes:~~

- ~~The M~~ mix of working and non-working households
- Child density
- Age range of the prospective tenants
- Ethnicity and community cohesion
- Vulnerability and support services
- Community facilities provided.

- Perpetration of anti-social behaviour
- Supporting and promoting neighbourliness and existing community relationships

~~In order to ensure the balance is achieved, the Council may bypass applicants who have placed bids for the property.~~

The Council will also have local lettings policies in place in respect of the regeneration of Avondale Estate and Hayes Town Centre Estate which will for the avoidance of doubt extend to the rehousing of residents affected by regeneration to properties outside of the areas being regenerated. Potential future regeneration schemes would also likely have local lettings arrangements.

~~The following factors which the Council will consider in addition to those set out in paragraphs 5.11.1 and 5.11.5 above are:~~

- ~~5.11.1 — Perpetration of anti-social behaviour~~
- ~~5.11.2 — Supporting and promoting neighbourliness and existing community relationships~~

## 6. ALLOCATION OUTSIDE CHOICE BASED LETTINGS

In certain specified cases, an allocation may be made outside of the choice based lettings scheme. These are:

- Extra care housing.
- Where a household urgently requires an adapted property.
- Where vulnerable applicants are unable to participate effectively in the bidding system, or where they have specific accommodation needs.
- Where there is a recommendation from police, social services or other professional agencies for a type of accommodation to meet an individual need.
- Where no successful bids are received for an advertised property.
- Where an applicant has been unfairly bypassed for a property.
- Where a household have succeeded to a tenancy but are under-occupying or do not need adaptations or specialised accommodation.
- Where homeless households have failed to bid successfully for available properties and the lease on their temporary accommodation has ended, they will be made one direct offer of suitable accommodation.
- Where homeless households have been in temporary accommodation for longer than the average period, they will be made one direct offer of suitable accommodation.
- Where service tenants entitled to re-housing have not bid successfully for a suitable home by the time they are required to leave their accommodation, they will be made one direct offer of suitable accommodation.
- Where a management transfer has been agreed, the tenant will be made one direct offer of suitable accommodation. The size of the accommodation will be the same as their previous tenancy, or a size that meets their needs under the terms of this policy, whichever is smaller.
- Where a reciprocal arrangement has been agreed, the incoming household will be made one direct offer of suitable accommodation.
- Where an applicant needs to move immediately, for example, tenants being decanted to enable a major repair to the property to be carried out or tenants being decanted where their area is being regenerated by the Council. One direct offer of suitable accommodation may be made
- Ex-tenant discharge from an institution. One direct offer of suitable accommodation will be made. The size of the accommodation will be the same as their previous tenancy
- Where lettings to certain groups is required in order to achieve a balance of lettings. Periodically this may be set out in a lettings plan.
- Where special allocation arrangements through local lettings plans on new developments are in place in order to achieve a balanced community.

## **7. REFUSALS FOLLOWING DIRECT OFFERS**

### **7.1 Recording the refusal**

The applicant must give their reasons for refusal in writing or sign a written statement of their reasons. The property will not usually be held vacant while the reasons for the refusal are considered – it will normally be offered and let to another applicant unless the offer is to a homeless household. In such cases, the offer may be held for a short period (usually no longer than 48 hours) while the reason for the refusal is considered. The applicant will be advised of the possible consequences and given a chance to reconsider their decision to refuse.

### **7.2 Unsuitable offers**

If there is a clear mismatch of the applicant and property details, the offer will be withdrawn and the rights of the applicant will not be affected.

### **7.3 Consequences for refusing reasonable offer**

#### **(a) Homeless household**

If the offer is considered to be suitable, the applicant will be informed of the council's intention to discharge its homelessness duty and if they are occupying temporary accommodation provided by the council, to commence eviction proceedings. They will be advised of their right to seek a review of this decision and, if still not satisfied to pursue their disagreements through the courts.

#### **(b) Service tenants**

Following refusal of a reasonable offer, ex-service tenants will be advised that their priority for re-housing has been withdrawn and that the council considers it has fulfilled its contractual obligation to offer suitable re-housing. The applicant will be advised to make their own housing arrangements and eviction proceedings from the tied accommodation will be started.

#### **(c) Management transfer**

Following refusal of a reasonable offer, tenants will be advised that their high priority has been removed. Their housing need will be reviewed and if assistance is still required, they will be placed in the appropriate priority 'band' on the waiting list, for example, as a homeless applicant. The relevant housing manager will be informed.

#### **(d) Reciprocal arrangements**

Following refusal of a reasonable offer, applicants will be advised that their priority for re-housing has been withdrawn and that the council considers it has fulfilled its reciprocal agreement to offer suitable re-housing. The applicant will be advised to seek help from their own provider/landlord.

#### **(e) Temporary/permanent decant**

Following refusal of a reasonable offer, the relevant housing manager will be advised so that they can commence possession proceedings.

(f) **Ex-tenant discharge from an institution**

Following refusal of a reasonable offer, tenants will be advised that their priority has been removed. If they require assistance, they will be advised to reapply and their housing need will be assessed and if deemed to be in housing need, they will be placed in the appropriate priority 'band' on the waiting list for example, as a homeless applicant. The relevant housing manager will be informed.

g) **Other circumstances**

Following refusal of a reasonable offer, applicants will be advised that no further direct offers will be made and they can continue to access housing by bidding through choice based lettings.

## 8. PRE-OFFER VERIFICATION CHECKS

Qualifying or being eligible to join the housing register does not guarantee an offer of accommodation. Verification checks will be carried out prior to an applicant receiving an offer of accommodation. Households will not be verified if they are found to fall within one of the criteria set out below. This means that they will not be made an offer of accommodation even if their bid for a property has been successful.

The circumstances are:

- a) Any applicant who is no longer eligible or qualifies for housing.
- b) Council tenants who have a current application to buy their dwelling or for a home purchase grant such as Homebuy.
- c) Any applicant who owes more than 4 weeks rent or other housing debts including temporary accommodation arrears, former tenant arrears, and council tax arrears. They will not be verified unless they have an agreement to reduce the arrears in place and have been making regular payments to reduce the outstanding amount for a minimum of six months at the time of offer.
- d) Any applicant or member of their household who has perpetrated serious anti-social behaviour where either a possession order is being sought or has been obtained, or where the antisocial behaviour is of a level which would warrant eviction. They will not be verified unless they demonstrate a change for a minimum of 12 months at the time of offer.
- e) Any applicant or member of their household who has given false or misleading information on their housing application or has withheld information that has been reasonably requested.
- f) Any applicant or tenant who has not maintained their property in accordance with the terms of their tenancy will be required to make good any damage.
- g) Any applicant or member of their household who has been convicted of housing or welfare benefits related fraud where that conviction is unspent under the Rehabilitation Offenders Act 1974. They will not be verified unless this conviction is spent.
- h) Any applicant or member of their household who has assaulted a member of staff and an injunction is being sought or has been obtained.

Information from the following sources will be checked, but are not limited

to:

- Information held by the Council e.g. housing benefit, electoral roll, council tax records.
- Information held by the Council's community safety team for any un-tenant like behaviour.
- Information held by other local authorities, landlords or registered providers.
- Land registry and credit reference checks.
- Information from neighbours, employers, Social Services and other agencies.

The council will also carry out unannounced visits to check the details provided about all household members and occupation of their current accommodation. Where necessary, the household will be asked to provide evidence to support their application. If the applicant is not available, a card requesting the applicant to make contact with the council within 24 hours will be left so that the visit can be rearranged. If the applicant fails to respond and a follow up visit is not carried out within 48 hours, the applicant will not be verified for the property they have successfully bid for and they will be removed from the shortlist for that property.

## 9. LETTINGS PLAN

In order to strike the right balance of allocations to the different groups and manage the cost of homelessness, the Council, may set out requirements in a an annual lettings plan will be in place. It will be published every year, and Where this is the case, lettings made will be monitored against this. All lettings made under this scheme are counted for the purposes of the lettings plan. If monitoring shows that the allocation target set out in the plan is not being achieved, the council reserves the right \_\_\_\_\_ to enhance access by advertising or directly allocating some properties to specific groups.

~~The plan will contain an estimate of the supply of homes which will be available for letting each year including new homes due to be completed and existing homes to be re-let. It will also set out the proportion of the available lettings that will go to each of the groups identified to have housing need.~~

It will be ensured that a reasonable proportion of allocations are provided to the people with high level of assessed housing need, for example those who meet reasonable preference criteria. It and it will be ensured that one group does not dominate the scheme.

In cases where specific action has been taken to release homes, the resulting vacancies will only be ring-fenced to particular groups. For example, homes recovered as a result of fraud activity may be allocated to homeless households; homes released by under occupiers allocated to overcrowded households in a chain of lettings.

## 10. APPLYING FOR HOUSING

### 10.1 Tackling Fraud:

The Council recognises its duty to protect the public resources it administers. Detailed enquiries about applications will therefore be made in order to guard against misrepresentation and fraud. Such enquiries will be made in all cases where applicants appear to have sufficient priority for an offer of accommodation, and in other cases as resources allow. The enquiries will be made at any time and it can be at the time of application or subsequently, including after any grant of tenancy. Applications will be suspended if there is evidence of misrepresentation or fraud until enquiries are completed. These checks may involve cross referencing information provided by applicants when they apply to the housing register with other data the Council holds, including information on housing and council tax benefit and the electoral roll.

### 10.2 Who can be included on the application?

Pursuant to this Allocation Policy the Council determines the priority between applicants for the offer of tenancies of social housing from within the Council's own housing stock and of those premises owned by Housing Associations in respect of which the Council has the right to nominate tenants.

The Council must offer appropriately sized accommodation to applicants and their households. The size of accommodation that is offered to applicants depending on the composition of their eligible household is set out in Section 11 below.

This paragraph sets out who the Council will take in-to account in determining the size of any applicant's household. There are two basic criteria which the Council has regard to in determining whether or not someone is to be counted as a member of your household:

- (1) First to be a member of your household a person must be a member of your family (although the definition of family is a loose one); and
- (2) Second, there must be a relationship of dependency between you and the person; this could mean that you are dependant on that person, or that they are dependant on you, or that they are dependant on another eligible member of your household. For this purpose, dependency includes legal, financial and physical dependency.

For the avoidance of any doubt, just because someone is living with you currently and is a member of your family, that does not mean that the Council will treat them as a member of your household for the purposes of this Allocation Policy.

People in the following categories will be regarded by the Council as part of an applicant's household:

- An applicant's spouse or civil partner or someone with whom the applicant lives as if they are a spouse or civil partner;
- An applicant's children (or the children of another eligible member of the



applicant's household) aged less than 18 where the applicant (or the eligible member of the applicant's household who is the child's parent) is the sole legal guardian and there is no other available legal guardian who could reasonably accommodate the children.

- An applicant's children who are over 18 but are in tertiary education doing their first degree (or similar) – but not any subsequent courses and who either live with the applicant all year because the education institution they are at is local or return to live with the applicant during holidays;
- Dependent relatives of the applicant who are unable to live independently and there are no other suitable options available to accommodate them.
- Live-in carers where an applicant is confirmed to have an essential need for live-in care, for example where they need overnight support (if a live-in carer is not your relative the Council will require evidence that they have been a carer for at least 2 months).

### **10.3 Who should not be included on the application?**

The Council will not include in your household for the purposes of determining the size of accommodation that you should be offered account anyone in any of the following categories even if they are currently living with you:

- Children aged 18 or over (unless they come within one of the categories of dependent adult identified in paragraph 10.2 above; i.e., a student or a carer or cared for adult)
- Other adult relatives
- Friends or visitors
- Lodgers
- Sub-tenants
- Anyone else sharing your current accommodation
- Anyone who falls within legislation prohibiting them from having recourse to public funds.

### **10.4 Change of circumstances:**

The size of accommodation that you can bid for on through Locata is determined by the size of your household. It is possible that the size of your household might change before you make a successful bid for accommodation on the Locata website. For example, you may have another child, in which case your household size will increase, or a child who is under 18 at the time of your application may have their 18th birthday, in which case (unless that child is within one of categories of dependant adult) your household will decrease. These are not the only circumstances in which your household size can change but are examples of circumstances in which your household size will change.

Each time you log on to Locata to place a bid you will be asked whether anything about your application has changed and to update your contact details. It is important that the Council and other housing providers have the most up to date information.

Once placed in a priority band, you must notify the Council in writing of any change in your circumstances that will or might affect your priority for housing, for example:

- A change of address for themselves or any other person on the application.
- Any additions to the household for the purposes of the application.
- Any member of the family or any other person on the application who is no longer a member of the applicant's household.
- Any change in income or savings
- Applicants may be temporarily suspended from bidding while the council assesses the information provided by the applicant and completes further enquiries that may be necessary.

If you make a bid on the Locata website and are shortlisted for a property, the housing provider will check that your household size is appropriate for the premises; the appropriate size of accommodation for different sized households is set out in Section 11 below.

If you are offered and accept a tenancy of any premises through the Locata website and it is subsequently discovered that you made any misrepresentation about the size of your household, that may give rise to a Ground for Possession. This is the case whether you are granted a Council Tenancy or a Housing Association Tenancy.

#### **~~10.2 Who can be included on the application?~~**

~~You can include any household member who is part of and living in the household. Includes:~~

- ~~Partners, spouses or civil partners of the main applicant.~~
- ~~Children aged less than 18 where the main applicant is the sole legal guardian and there is no other available legal guardian who could reasonably accommodate the children.~~
- ~~Dependent relatives who are unable to live independently and there are no other suitable options available to accommodate them.~~
- ~~Live-in carers where an applicant is confirmed to have an essential need for a carer, for example overnight support.~~

#### **~~10.3 Who should not be included on the application?~~**

~~You should not include any of the following people currently living with you on your application:~~

- ~~Non-dependent adult children~~
- ~~Other adult relatives~~
- ~~Friends or visitors~~
- ~~Lodgers~~
- ~~Sub-tenants~~
- ~~Anyone else sharing your current accommodation~~
- ~~Anyone who falls within legislation prohibiting them from having recourse to public funds.~~

#### **~~10.4 Change of circumstances:~~**

Each time an applicant logs on to Locata to place a bid they are asked whether anything about their application has changed and to update their contact details. It is important that the Council and other housing providers have the most up to date information.

~~Once placed in a priority band, applicants should notify the Council in writing of any material change in their circumstances that will affect their priority for housing, for example:~~

- ~~➤ A change of address for themselves or any other person on the application.~~
- ~~➤ Any additions to the family or any other person joining the application.~~
- ~~➤ Any member of the family or any other person on the application who has left the accommodation.~~
- ~~➤ Any change in income or savings~~
- ~~➤ Applicants may be temporarily suspended from bidding while the council assesses the information provided by the applicant and completes further enquiries that may be necessary.~~

### **10.5 What happens if I do not notify you of a change?**

If the Council find your circumstances have changed as a result of the annual review of your application, or as part of the pre-offer verification checks and you have not notified the change, your application will be suspended from bidding while we investigate how the changes affect your eligibility and housing priority.

### **10.6 Annual Review:**

In order to maintain the housing register as accurately as possible, every applicant will be sent a notification to renew their application annually on the anniversary of their registration. Included in this will be a request to provide information on any changes in circumstances.

After a renewal request has been issued, no reminders will be sent. If an application is not renewed within 28 days of the issue of the renewal letter, the application may be cancelled without further notice.

### **10.7 Cancelling an application**

We will cancel your housing applications for the following reasons:

- If you ask us to cancel the application.
- If your circumstances change and you are no longer eligible under the scheme.
- If your circumstances change and you no longer qualify under the scheme.
- If you fail to respond to an application review within the specified time limit.
- If you have refused the offers of social housing you are entitled to under this scheme. These are set out in section 7 above.
- If you have accepted an offer of social housing under this scheme.
- If you have been found to have made a false statement on your housing application.

You will be notified in writing if the council intends to remove you from the

Housing Register and give reasons for the removal.

### **10.8 Reinstating a cancelled application:**

Sometimes applications are cancelled where the household has a valid reason for not providing the information the Council has asked for or not responding to a request. In cases where a household's application has been cancelled, as long as the applicant makes contact within 28 days from the date of the cancellation, their application will be reinstated to the housing register. Supporting evidence will be required.

If an application is cancelled but the household does not make contact within 28 days from the date of cancellation, the application will not be reinstated. If the household still wants to apply for social rented housing they will have to make a new application which will be assessed based on the criteria in the scheme and a new banding and priority date will be given.

### **10.9 Appealing against a decision**

Applicants have the right to ask for a review of any decision made under the terms of this policy with which they do not agree.

Requests for a review must normally be made:

- In writing (-a request over the phone or made verbally will need to be confirmed in writing)
- Within 21 days of the date of the decision being appealed.

## **11. ASSESSMENT OF HOUSING NEED AND DETERMINING PRIORITY**

### **11.1 Initial assessment**

The Council will make an assessment based on the information provided in the application or received in connection with the application. You will be notified in writing about the outcome of the assessment which will include the priority band awarded and the date.

Your application will remain in this band until it is verified at the time of offer of accommodation. It is therefore in your interest to ensure that you provide the council with accurate and up to date information so that an offer of accommodation is not withdrawn at a later stage (offer stage).

### **11.2 Bedroom standard - size of accommodation**

The size of accommodation for which each applicant will be considered will depend on the composition of the applicant's household. The requirements for each size of household are set out below:

SIZE OF FAMILY	SIZE OF PROPERTY
Single person including single pregnant person	Bedsit/1 bedroom
A couple without children, including if pregnant_	1 bedroom
Two adults of the same sex and generation, for example flat sharers or two brothers	2 bedrooms
A couple and an adult son or daughter under 20 and another child of the same sex_	2 bedrooms
A couple with two children of the same sex	2 bedrooms
Two adults of opposite sex who do not live as a couple, for example brother and sister	2 bedrooms
A couple with two children of opposite sex and both under ten years old	2 bedrooms
A couple with two children of opposite sex, one of whom is over ten years old	3 bedrooms
A couple with three children	3 bedrooms
A couple with four children (all of the same sex or two of each sex)	3 bedrooms
A couple with two children of the opposite sex under 10 years and one dependent relative (for example, widowed mother	3 bedrooms
A couple with four children (three of one sex and one of the opposite sex, where the child of the opposite sex is over ten)	4 bedrooms
A couple with four children (three of one sex and one of the opposite sex, where the child of the opposite sex and one of the other children are under ten)	3 bedrooms
A couple with more than four children	4 bedrooms
A couple with three children and one dependent relative	4 bedrooms
Foster children over three years of age will be entitled to a separate bedroom in line with the fostering service national minimum standards	Any

Larger accommodation than specified above may be considered in exceptional circumstances on the recommendation of a specialist advisor, for example the Council's Medical Adviser or Occupational Therapy Service.

Overcrowded households ~~with a four bedroom need~~ can bid for and be let a property with one bedroom fewer than their assessed need~~three bedroom property~~, so long as this does not result in them being statutorily overcrowded. Any household taking advantage of this option is able to reapply for a transfer to a property with the correct number of ~~four~~ bedrooms for their assessed need.~~home~~. This would be treated as a new application in terms of both banding priority and priority date.

In calculating the number of bedrooms available within properties, the Council will treat every habitable room as a bedroom except kitchens, bathrooms and one room for use as a living room. The Council will normally consider additional downstairs

rooms in houses for use as bedroom in accordance with Housing Benefit Regulations.

In the case of existing secure council tenants agreed for a management transfer due to extreme circumstances such as violent assault, harassment etc, who are able to move to alternative accommodation as the only viable resolution to their current difficulties, for fairness to other applicants on the housing register, these moves will only be to the same size of accommodation as they currently occupy regardless of their housing need at that time.

It is important that you notify the Council of any changes in the size or make-up of your household because the size and make-up of your household determines the size of the premises that you are entitled to bid for on the Locata website. If you fail to update the details and are offered a tenancy of premises that are not appropriate for the size and make-up of your household the Council may withdraw the offer of the tenancy if your failure is discovered before you have signed the tenancy and if the offer is withdrawn you may be suspended from the Locata website for a period of time. If you fail to update the details and are offered a tenancy of premises that are not appropriate for the size and make-up of your household and you take up the offer of the tenancy the Council or if the landlord is a housing association that Housing Association may rely on that failure as a ground for possession of the premises.

### **Shared residency of children**

Where children are subject to a shared residency arrangement, the children are only considered to need one home of adequate size.

### **Split families**

Where the family unit is not currently residing together, the assessment will be based on the part of the household that occupies accommodation that provides them with the most suitable housing providing there is a reasonable expectation that they should reside together.

Additional priority based on residency criteria will be based on that part of the household with the longest residency in the borough.

## **12. REASONABLE PREFERENCE GROUPS**

The council will maintain the protection provided by the statutory reasonable preference criteria in order to ensure that priority for social housing goes to those in the greatest need. The majority of applicants are placed on the housing register due to having a reasonable preference for housing.

### **12.1 Homeless households**

This section applies to people who are homeless within the meaning of Part 7 of the Housing Act 1996 (amended by the Homelessness Act 2002, the Localism Act 2011 and the Homelessness Reduction Act 2017) or, in certain circumstances, are threatened with homelessness or otherwise owed a relevant Part 7 duty.

A person is threatened with homelessness for these purposes if they have applied for Part 7 assistance and are likely to become homeless within 56 days or, if occupying accommodation under an assured shorthold tenancy, have been served with a valid notice under section 21 of the Housing Act 1988 expiring within 56 days.

A relevant Part 7 duty means for these purposes an accommodation duty owed to a Part 7 applicant who is eligible for assistance and either (i.) has a priority need and has become homeless intentionally, (ii.) has a priority need and has not become homeless intentionally, or (iii.) does not have a priority need, has not become homeless intentionally and Hillingdon Council has elected to secure that accommodation becomes available for their occupation.

Hillingdon Council's first priority, pursuant to its duties and powers under the Homelessness Reduction Act 2017, is to prevent people from becoming homeless by helping them to remain in their current accommodation or facilitate a move to alternative private rented accommodation. Where Hillingdon Council believes that potential applicants are able to access market housing i.e. private rented or low cost home ownership, the Council will provide advice and assistance as necessary.

The Localism Act 2011 has given local authorities the power to discharge duty to homeless households into the private sector and outside of local boundaries where it is not reasonably practicable to accommodate them within the borough. Therefore the council will use suitable and affordable private rented sector accommodation to discharge its homelessness duty where it considers this to be appropriate. This will apply to homeless applicants who applied after 9 November 2012.

Where Hillingdon Council has been unable to prevent homelessness, applicants who satisfy the 10 year Qualification Rule in paragraph 2.2.4 of the Policy secured by Hillingdon Council under Part 7 of the Housing Act 1996 will be placed in one of the following bands:-

- ❖ ~~Band A7~~ – In temporary accommodation secured by ~~the Hillingdon~~ Council but the landlord wants the property back **AND** the council cannot find alternative suitable temporary accommodation. Where an applicant fails to successfully bid within 6 months, a direct offer of suitable accommodation will be made. If the property is refused the council will discharge its duty under Part 7 of the Housing Act and withdraw any temporary accommodation provided.
- ❖ Band ~~B9~~ – In Bed & Breakfast (for the purpose of this policy Bed & Breakfast means nightly paid accommodation), council hostel accommodation or women's refuge.
- ❖ Band ~~C11~~ – In other forms of temporary accommodation or has no accommodation.

Where, in relation to persons to whom this section applies, Hillingdon Council has been unable to prevent homelessness, applicants who do not satisfy the 10 year Qualification Rule in paragraph 2.2.4 of this Policy will be placed in Band ~~D13~~. However, a Single Homeless Move on Panel may award applicants in supported accommodation provided for single homeless people a Band 7 to facilitate move-on through the homelessness pathway and ensure that the needs of those who are particularly vulnerable are met. The panel will consider each referral individually to



determine whether to award priority for social housing.

Applicants threatened with homelessness for the purposes of this section, whether or not they satisfy the 10 year Qualification Rule in paragraph 2.2.4 of this Policy, will also be placed in Band D7.

## **12.2 Households living in insanitary and unsatisfactory housing conditions**

A household is living in insanitary housing if their current accommodation does not have:

- A bathroom or a kitchen.
- An inside toilet.
- Hot or cold running water.

A household is living in unsatisfactory housing if their current accommodation:

- Does not have electricity or gas.
- Does not have adequate heating.
- Is in disrepair.
- Is unfit for human habitation.
- Has a category 1 hazard under the Housing Health and Safety Rating system that is an immediate threat to health and cannot be rectified within six months – this will be verified by a Private Sector Housing Environmental Health Officer.

There are some properties in Hillingdon with repair problems or are in need of improvement and modernisation. The council will not be able to offer alternative accommodation to everyone in this situation as most landlords have a duty to carry out repairs to their tenants' homes. Sometimes tenants are worried that asking for work to be done will make the relationship with their landlord difficult and that they may be asked to leave. The council will give advice about this and can offer help in working with the landlord.

The Council's aim is to ensure that repairs are carried out and that residents can remain in their property. Wherever possible, any repairs problems identified in applications will be dealt with by working with the person with the responsibility to make sure that repairs are carried out. In limited circumstances, a household may be re-housed due to disrepair problems.

The condition of the current accommodation will be checked by a member of the Private Sector Housing Environmental Health team and must have at least one category 1 hazard that cannot be resolved by the landlord within 6 months. Examples of where this would apply include where the current accommodation:

- Has severe damp
- Has a major structural defect including subsidence, flooding, collapsed roof
- Has been issued with a notice of statutory nuisance by an Environmental Health Officer

Has been declared unfit for human habitation and is due to be demolished under the Housing Act 2004.

Based on the circumstances, applicants will be placed in one of the following bands:-

- Band A-7 with 10 years' residency or 8 without – Closing Order issued, i.e. property is unfit for human habitation and there is no alternative measure to render the property fit as advised by Environmental Health Officer **OR**
- Where emergency re-housing is essential, for example, compulsory purchase order (CPO) is issued.
- Band B9 with 10 years' residency or 10 without– Household with dependent children living in unsanitary or unsatisfactory housing that cannot be addressed by Environmental Health action.
- Band C-11 with 10 years' residency or 12 without – Other unsanitary or unsatisfactory housing conditions that cannot be addressed by Private Sector Housing Environmental Health action.

### 12.3 Overcrowded households

A household is living in overcrowded housing if their current accommodation is too small for the size of their family.

The number of bedrooms a household needs will be based on the bedroom standard outlined in section 11.2.

The priority awarded to a household will depend on each household's circumstances and the level of overcrowding they are experiencing.

- ❖ Band B9 with 10 years' residency or 10 without – Statutorily overcrowded as defined in Part X of Housing Act 1985 **OR** Severe overcrowding – where a household is lacking 2 or more bedrooms.
- ❖ Band C11 with 10 years' residency or 12 without - Other overcrowded households lacking 1 bedroom.

### 12.4 Medical grounds

If you apply for housing because your current accommodation affects a medical condition or disability, your application will be referred to the council's medical adviser or occupational therapy team depending on what you have put in your application for assessment. A medical condition or disability includes, for the avoidance of doubt, a mental ill health condition.

Medical assessment does not examine how severe an applicant's medical condition or disability is. It looks at how your current accommodation affects the health or disability of a household member. The assessment is based on whether your health or a member of your household's health would improve by moving to alternative accommodation.

Therefore, medical priority is awarded according to the extent to which the health or

welfare of one or more members of the applicant's household is affected by their current housing conditions and the expected benefits of providing suitable alternative settled housing.

Applicants will complete a Medical Assessment Form to provide details of the medical condition and other supporting information. If additional information is required before a decision can be made, this will be obtained at ~~the a~~ cost to the council.

Based on the Medical Adviser's recommendations, applicants will be placed in one of the following bands:-

- ❖ Band 7A with 10 years' residency or 8 without – Emergency Medical: the applicant or a member of the applicant's household has a life threatening condition that is seriously affected by their housing.
- ❖ Band 9B with 10 years' residency or 10 without – Medical Hardship: the applicant's current housing conditions are having a major adverse effect on the medical condition of the applicant or a member of the applicant's household.
- ❖ Band C11 with 10 years' residency or 12 without – Medical Need: the applicant's current housing conditions are having a moderate or variable adverse effect on the medical condition of the applicant or a member of the applicant's household.

## 12.5 Welfare grounds

### 12.5.1 Persons fleeing domestic abuse

The Council recognises the particular need for support and assistance for those escaping from domestic abuse required in order that they can re-build their lives away from abuse and harm. Priority will therefore be given to those who are homeless within the meaning of Part 7 of the Housing Act 1996 (as amended) and require urgent housing as a result of domestic abuse.

Band B` 9 with 10 years' residency or 10 without

### 12.5.2 Care Experienced Young People

If a young person who has been looked after by Hillingdon council is ready to move into their own accommodation, they may be considered for housing on welfare grounds. This includes those placed out of the borough. To qualify, the young person must have been a relevant child under the Children Leaving Care Act 2000, which means they would have been looked after by the council for a certain period of time and have had a pathway plan drawn up.

In most cases young people leaving care will be ready to move into independent living with the support of Hillingdon's Social Care service. If the young person is ready to move- on and has developed the required life skills, such as managing a budget, cooking and cleaning, the council will support them to find suitable private rented accommodation.

For some young people whose support needs are high and accommodation in the private rented sector would have a detrimental effect on their transition to independent living, their housing application will be considered by a Panel (Care Experienced Young People's Panel) who will determine whether to award priority for social housing.

The Panel consists of senior officers from Housing and Social Care Services. The panel assesses each referral individually to ensure the needs of any particularly vulnerable or at-risk young person is addressed.

To be considered for social housing, the care experienced young person must meet one or more of the following criteria:

- Young people subject to Care Orders under section S31 of the Children Act 1989 where the council has parental responsibility (Looked after children).
- Young people with moderate learning difficulties or disability or those who are subject to a statement of educational needs or a psychological assessment.
- Young people with significant mental health issues – who have had involvement with CAMHS or CMHT for a period of three months or longer and are continuing to receive treatment.
- Young people with complex needs placed in high cost placements where they no longer require that degree of support and whose application has been approved by the 'Access to Resources Panel' or the 'Asylum High Cost Placement Panel'.
- Young people with significant offending behaviour, which limits access to other types of suitable accommodation.
- Care experienced young people who are also parents and also meet one other criteria listed (e.g. they or their baby are especially vulnerable).
- Those with other mitigating circumstances.

- ❖ Band B-7 with 10 years' residency or 8 without
- ❖ - Care-leaver experienced young person approved by Panel

### 12.5.3 Fostering and adoption

The council recognises the contribution that foster carers and adopting parents make towards ensuring that children in Hillingdon are cared for. Priority will be given to those applicants approved or being assessed for approval to adopt or foster and where recommendation is made by Social Services to provide accommodation because the current accommodation is not large enough or would cause overcrowding.

Tenancies offered will be in accordance with the tenure terms set out in the council's tenancy policy.

- ❖ Band A7 with 10 years' residency or 8 without – Enabling fostering and adoption

Foster children over three years of age will be entitled to a separate bedroom in line with the fostering service national minimum standards. This is done to prevent the potential for bullying or abusive behaviours from or to other children. This also allows for some stability, privacy and space for the fostered child.

#### 12.5.4 Move-on from Supported housing

In collaboration with Social Services and other agencies, clients placed in supported housing who are ready for independent living will be considered for move-on accommodation. This includes people in institutional care, for example, group homes and other forms of supported housing to help them achieve independence.

Applicants referred for move-on to independent accommodation will be considered for the full range of provision available, including private sector accommodation to meet their housing need. Only cases with a demonstrable need for long term settled accommodation will be prioritised for social housing. The referral will explain the current living arrangements and the impact they are having on the individual's transition to independence.

- ❖ Band B-7 with 10 years' residency or 8 without – Ready for independent living (after a minimum of 6 months)

#### 12.6 Hardship grounds

There are a number of households applying to the housing register who experience serious hardship because of a combination of different factors which make the need for re-housing more urgent than when considered separately.

The decision as to the appropriate priority 'band' will depend on both the combination and degree of the various factors with a view to ensuring that the greatest priority is given to those in the greatest need.

In circumstances where this applies, a panel of officers (Hardship Panel) will undertake a review of the case to determine whether priority for re-housing is necessary.

The following priority banding will be considered

- ❖ Band B8 with 10 years' residency or 9 without – The applicant or a member of their household has multiple needs or has an urgent need to move. Examples include:
  - To give or receive care or support from/to a resident in the borough, avoiding use of residential care. It is constant care to/from a close relative as evidenced by a professional's report and supported by the Council's Medical Adviser;
  - Child protection reasons;
  - The need to move to take up a confirmed offer of permanent employment;
  - Other urgent welfare reasons.
  
- ❖ Band €10 with 10 years' residency or 11 without – Out of borough applicants with a need to move to Hillingdon for medical or support reasons.

Priority will not be given to those who need to move to a particular locality within the borough if [the](#) transport network is considered to be good.

## 13 LOCAL PRIORITIES

In addition to statutory reasonable preference groups, the council will provide housing assistance to certain groups who meet local needs and priorities.

### 13.1 Members of the British Armed Forces

This policy applies to people who have served in the Royal Navy, Royal Air Force and British Army and have not been dishonorably discharge.

- Members of the Armed Forces and former service personnel where the application for housing is made within 5 years of discharge.
- Serving or former members of the Reserve Forces who need to move because of serious injury, medical conditions or disability which is wholly or partially attributable to their service.
- Bereaved spouses or civil partners of members of the Armed Forces leaving Services Family Accommodation following the death of their service spouse or partner and the death was wholly or partially attributable to their service.

❖ Band B-8 – Members of the British Armed Forces.

Members of the British Armed forces who have continuously resided in the borough for 10 years prior to signing up for the service and have not been dishonorably discharged.  
Band 7 A.

### 13.2 Specific schemes

Hillingdon participates in various schemes that assist welfare agencies and others where there is imminent personal risk to the applicant or their family if they remain in the property or area.

The schemes include:

- National Witness mobility scheme (to enable those testifying in major criminal trials to be in a safe area).
- Pan-London Safe and Secure scheme (to tackle gang violence).
- West London Domestic Violence protocol (enables victims of violence to move to a safe area).

Applicants from outside the borough will be accepted under these schemes on the understanding that Hillingdon residents in similar circumstances will be eligible to benefit from the schemes.

❖ Band A-7 – Schemes set out above or similar as agreed by the Council.

### 13.3 Under-occupation

A household is considered as under-occupying when the accommodation has more rooms available than the household needs.

❖ Band A3 with 10 years' residency or 4 without – Giving up 1 or more bedrooms.

~~Under-occupying tenants will be given a higher priority than other Band A applicants in terms of their rehousing other than those affected by regeneration proposals.~~

### 13.4 Releasing adapted property

The council has a small number of properties that are specifically adapted for disabled or older people. These properties are in short supply, therefore council and Housing Association tenants, who currently live in adapted accommodation but no longer need it, are given priority to move to suitable non-adapted accommodation.

- ❖ Band A-7 with 10 years' residency or 8 without – release adapted property.

### 13.5 Decants

#### a) Permanent Regeneration/essential/urgent -decant

Council tenants who urgently need to move because their home is ~~imminently~~ required to be demolished or for essential works to be undertaken within 3 months, ~~and the tenant will not be returning, for example, to enable development of the site.~~ In these circumstances, they will be prioritised for a move to a suitable alternative home.

Council or Registered Social Landlord tenants who need to move because their home has become temporarily uninhabitable, for example, because of a fire, flood or other factors should approach their own landlord if they require temporary accommodation while repairs are carried out to their home.

#### b) Temporary Other decant

~~Council or Registered Social Landlord tenants who need to move because their home has become temporarily uninhabitable, for example, because of a fire, flood or the factors should approach their own landlord if they require temporary accommodation while repairs are carried out to their home.~~

If major works of a less urgent nature are to be carried out, council tenants may be offered alternative accommodation and will have the option of returning to their original home once the works have been completed.

- ❖ Band A 1 with 10 years' residency or 2 without – ~~Permanent D~~decant required to progress regeneration or essential/urgent works.
- ❖ Band B-9 with 10 years' residency or 10 without – ~~Temporary Other~~ decant.

~~Tenants permanently decanted as a result of a Council regeneration programme will be given a higher priority than other Band A applicants in terms of their rehousing.~~

### 13.6 Management transfer

A management transfer will be considered for an existing social tenant where there is demonstrable evidence to support imminent personal risk to the tenant or their family as a result of violence or harassment if they remain in the property. They will be made one suitable direct offer of accommodation. The size of the accommodation will be the same as their previous tenancy, ~~or a size that meets their needs under the terms of this policy, whichever is smaller.~~

- ❖ Band A5 with 10 years' residency or 6 without – Management transfer emergency such as domestic violence or harassment.

~~Tenants eligible for a management transfer will be given a higher priority than other Band A applicants in terms of their rehousing other than downsizing under occupiers those affected by regeneration proposals.~~

### **13.7 Reciprocal request**

The council will only agree to reciprocal requests from other authorities and Registered Providers where they can demonstrate that there is an imminent personal risk to the tenant or their family and accommodation is required in Hillingdon. And that the reciprocal property being offered will be beneficial to Hillingdon residents with high priority to move.

Reciprocal requests will not be accepted from West London Locata partners who can use the cross partner bidding arrangements.

Where a reciprocal arrangement has been agreed, the incoming household will be made one direct offer of accommodation.

- ❖ Band ~~A~~ 7 with 10 years' residency or 8 without – Reciprocal agreement for emergency such as domestic violence or harassment.

### **13.8 Ex-tenant discharged from an institution**

Where a council tenant enters an institution such as hospital or is imprisoned or is in a rehabilitation establishment for a period of more than 6 months and would therefore either accumulate rent arrears or possibly lose their tenancy, they can voluntarily give up their tenancy.

Alternative accommodation can be offered upon release in order to make the best use of the council's housing stock by offering the accommodation to someone in need instead of keeping the accommodation empty for lengthy periods.

Upon release they would be made a direct allocation of a property that meets their needs. The size of the accommodation will be the same as their previous tenancy, or a size that meets their needs under the terms of this policy, whichever is smaller.

This will not apply to tenants who have been imprisoned in relation to a crime that would enable the council to seek repossession of their accommodation or where possession action has already commenced.

- ❖ Band ~~B9~~ with 10 years' residency or 10 without – By agreement to relinquish council tenancy on entering an institution.

### **13.9 Relinquishing more than one property**

Applications for transfer may be made jointly by separate tenants who wish to apply for housing together, on the condition that both tenancies will be relinquished if the council makes an acceptable offer of a transfer to a third property.

- ❖ Band ~~B~~ 9 with 10 years' residency or 10 without – By agreement to relinquish two separate social properties in return for one property



### 13.10 Service tenants where there is a contractual obligation

Employees of the Council who have a service tenancy associated with their employment may be re-housed in certain circumstances where the council has a contractual obligation to re-house, for example on retirement, redundancy or redeployment.

Where service tenants entitled to re-housing have not bid successfully for a suitable home by the time they are required to leave their accommodation, they will be made one suitable direct offer of accommodation.

- ❖ Band A7 with 10 years' residency or 8 without – Ex-service tenant.

## 14 ADDITIONAL PRIORITY

Additional priority is awarded in order to determine priorities between people in the reasonable and local preference groups. ~~It~~ Priority is awarded in the following circumstances:

~~14.1 Members of the British Armed forces who have continuously resided in the borough for 10 years prior to signing up for the service and have not been dishonorably discharged.~~

~~Band A.~~

~~14.2 Couples aged over 21 without children.~~

~~Additional priority is awarded to couples aged 21+ without children. This will improve access to available lettings to those households without children who would otherwise be in 'Band C'.~~

~~This policy applies to all couples including same sex partnerships where:~~

- ~~• They are aged 21 – 55.~~
- ~~• They have not had children.~~
- ~~• If co-habiting, they should have been doing so continuously for 12 months at the time of application. This will be verified through the electoral roll or council tax records.~~

~~Eligible couples will be required to sign a joint tenancy.~~

~~If the couple do have a child after making the application, the additional priority will be revoked and the housing need only 'priority band' will be reinstated.~~

- ~~❖ Band B – Couples aged 21+ without children.~~

### ~~14.3~~ 14.1 **10 years' continuous residency**

Additional priority is awarded to those who have a local connection by living in the borough continuously for a minimum period of ten years. This will support stable communities and reward households who have a long term attachment to the borough.

Local connection will normally mean that an applicant has lived in Hillingdon, through their own choice, for a minimum of 10 years up to and including the date of their application, or the date on which a decision is made on their application whichever is later.

For purposes of continuous residence, children spending time away from home for education due to periods of study such as at university and people who have moved away up to 3 ~~times~~years due to the requirements of their job will be disregarded.

People will also be considered as having a local connection with Hillingdon when they are placed in the borough of Hillingdon in temporary accommodation in accordance with sections 190(2), 193(2), 195(2) or who are occupying accommodation secured by any local authority under section 192(3).

Band 1 where would otherwise be Band 2  
Band 3 where would otherwise be Band 4  
Band 5 where would otherwise be Band 6  
Band 7 where would otherwise be Band 8  
Band 9 where would otherwise be Band 10  
Band 11 where would otherwise be Band 12

- ~~❖ Band A — where the household's housing need is 'Band B' + 10-year residence.~~
- ~~❖ Band B — where the household's housing need is 'Band C' + 10-year residence.~~

#### **~~14.4 Working households~~**

~~Additional priority will be given to households who are in housing need and are working but are on a low income which makes it difficult to access low cost or outright home ownership. This will encourage people who can, to work and raise levels of aspiration and ambition.~~

~~This policy applies to households where:~~

- ~~• At least one adult household member is in employment.~~
- ~~• The employment should be a permanent contract, self-employment or part-time for a minimum of 24 hours per week.~~
- ~~• The worker should have been in employment for 9 out of the last 12 months. Verification will be sought at the point of application and at the point of offer. Applicants must provide payslips, P60, bank statements or a verifying letter on headed paper in order to qualify.~~

- ~~❖ Band A — where the household's housing need is 'Band B' + working.~~
- ~~• Band B — where the household's housing need is 'Band C' + working.~~  
~~Members of the British Armed forces who have continuously resided in the borough for 10 years prior to signing up for the service and have not been dishonorably discharged.~~  
~~Band A.~~

## **15. ENCOURAGING PERSONAL RESPONSIBILITY**

Some applicants do not actively participate by bidding for available properties or continuously refuse properties that they have successfully placed bids on. The following will encourage personal responsibility from the applicants when exercising

their right to choose properties through the Choice Based Lettings scheme.

### **15.1 Homeless households living in temporary accommodation**

Homeless households take longer to be housed than other households in similar priority bands. In order to ensure that they actively participate in choice based lettings, one direct offer of suitable accommodation will be made to those households who have been living in temporary accommodation longer than other households with the same bedsize need. If the offer is unreasonably refused, the council will discharge its duty under Part 7 of the Homelessness Act and withdraw any temporary accommodation provided. The average waiting time by bedsize will be published annually on the Hillingdon Council website.

### **15.2 All applicants - unreasonable refusal of offers**

All applicants who successfully bid for properties but refuse more than 3 reasonable offers within a 6 month period will be suspended from bidding for a period of 6 months.

## **16. SPECIALIST ACCOMMODATION**

### **16.1 Disabled Adapted Properties**

Housing which has been designed or adapted for use by tenants with a disability will be allocated to a person who has been assessed as needing that particular type of accommodation even if there are other applicants (without a disability) in higher bands or with an earlier priority date.

Each application will be awarded a mobility category and properties will be advertised as suitable for applicants from those categories:

**DSL 1:** Applicants who are full-time wheelchair users (indoors and outdoors).

**DSL 2:** Applicants who need a property which is wheelchair accessible but who may not use a wheelchair indoors (cannot manage steps/stairs and may use a wheelchair some of the time).

**DSL3:** Applicants who have some mobility needs e.g. can only manage one or two steps/stairs.

Applicants are restricted to bid for properties that match their assessment need. In exceptional circumstances where an adapted property is urgently required, a suitable property may be directly allocated outside of the Choice Based Lettings system.

### **16.2 Older Person Dwellings**

Hillingdon has a number of properties that are designated for people aged over 55 years who can live independently. These units are advertised through the Choice Based Lettings system (Locata). Applicants can bid for these properties in the normal way as long as they meet the age criteria specified in the advert.

Older Person Dwellings are restricted either for people aged over 55 (these are usually flats) or in a few cases for people aged over 60 (these are usually bungalows).

If a couple would like to be considered for the property, the main applicant must meet the age criteria specified. Partners aged under 55 years are permitted to live at the

schemes but will not be permitted to be a joint tenant until they reach the minimum age for the accommodation.

### **16.3 Sheltered Housing**

Due to the specific nature of sheltered housing, additional criteria will apply. The criteria for allocating sheltered housing will be based on the following:

- The applicant is over 60.
- Has a recommendation for sheltered housing from a social or health care agency or has requested sheltered housing.
- Sheltered housing could assist the applicant in maintaining independent living and
- The lifestyle would be compatible with general use of the scheme.

If a couple applies to a scheme, both household members must meet the age criteria. Some Registered Providers accept applications for their sheltered schemes from those aged 55 years.

Applicants suitable for sheltered housing are placed in priority 'band €11 with 10 years' residency or 12 without' unless they qualify for a higher band for other reasons. The 'band €11 or 12' will only apply to bids on sheltered properties. They can only bid on any general needs or older person's property, if they have other identified housing needs.

If the applicant's care and support needs are considered too high for sheltered accommodation, the case will be referred for consideration for Extra Care Accommodation.

### **16.4 Extra Care**

Extra care housing aims to provide a home for life for older people by providing appropriate housing, care and support and makes the best use of available resources. A tenant may move into a scheme with low support needs but can access further care as and when the need arises as they get older instead of residential care.

Extra care housing is allocated outside of the Locata choice based lettings scheme by a panel of representatives from Housing, Health and Social Services. All referrals to the panel must have a community care assessment which identifies any care and/or housing related support needs. Occupancy and allocation of new units is based on the level of need of existing tenants and potential tenants in order to maintain a balanced mix of support needs.

### **16.5 Allocation of traveller pitches**

Traveller pitches are allocated in the same way as general needs properties. Households applying for pitches must complete a housing register application form and provide the required evidence of identify. Where there are medical grounds for re- housing, medical evidence must be provided for assessment.

The pitches are advertised on Locata and are allocated in accordance with this scheme.

## **17. MOBILITY WITHIN AND ACROSS THE COUNCIL'S BOUNDARY**

### **17.1 West London Cross Borough Moves**

A small percentage of vacancies are made available to applicants living in any of the Locata partner local authority areas.

### **17.2 Pan-London Mobility (Housing Moves)**

Hillingdon Council participates in pan-London Mobility (PLM) arrangements and contributes a small percentage of the properties that become available to be let through the scheme. The scheme facilitates moves by council and housing association tenants to other parts of London.

Homes under this scheme are allocated according to the PLM allocations scheme rules and not the rules outlined in this scheme. Full details of the PLM scheme can be found at [www.london.gov.uk](http://www.london.gov.uk).

Existing tenants of Hillingdon Council can make transfer applications through PLM to be considered for vacancies in other London local authorities.

### **17.3 Seaside and Country Scheme**

Hillingdon Council participates in the Seaside & Country scheme operated by the Greater London Authority (GLA) which enables social tenants in London to move out to desirable seaside and countryside towns.

### **17.4 Mutual Exchanges**

Allocations under this scheme are not included in this policy. However, the scheme offers an option for existing tenants to exchange with other social housing tenants and obtain alternative accommodation suitable for their needs.

Social housing tenants can also register on Homeswapper to find details of other households who they may be able to swap homes with:

<http://www.homeswapper.co.uk/>

### **17.5 Tenancy successions and assignments**

This is not included in this policy. For details, refer to the Council's Tenancy Policy.

## **18. SCHEME IMPLEMENTATION ARRANGEMENTS**

The scheme applies with immediate effect

## **19. CHANGES TO THE SCHEME**

The council reserves the right to expand, change or alter any element of the scheme, as and when required, to meet changes in housing need, capacity, resources and legislation.

A review of the policy will be carried out periodically.

## **20. MEMBERS OF THE COUNCIL, STAFF MEMBERS AND THEIR RELATIONS**

In order to ensure that the council treats all applicants fairly, any applications for housing or re-housing from Members of the council, employees of the council, any members of their family or household, and any other associated persons must be disclosed. These applications are assessed in the normal way but prior to any offers of accommodation being made, the case will be reviewed and approved by the senior designated officer.

Applications where no disclosure is made will be referred to the council's Fraud Investigations Team for investigations and where appropriate, legal action will be taken.

**Appendix 1: SUMMARY TABLE OF PRIORITY BAND AND DATE**

<b>Band 1 with 10 years' residence in Hillingdon and Band 2 without 10 years' residence in Hillingdon</b>				
<b>Case Type</b>		<b>Defining features of applicant or circumstances in which the band applies.</b>	<b>band</b>	<b>Priority Date</b>
<b>Tenants</b>	<b>Home Seekers</b>			
Regeneration / essential / urgent decant		Council tenants who need to move because their home is required to be demolished or for essential works to be undertaken within 3 months.	1 or 2	Date approved.

<b>Band 3 with 10 years' residence in Hillingdon and Band 4 without 10 years' residence in Hillingdon</b>				
<b>Case Type</b>		<b>Defining features of applicant or circumstances in which the band applies.</b>	<b>band</b>	<b>Priority Date</b>
<b>Tenants</b>	<b>Home Seekers</b>			
Under occupation		Applicant is willing to move to smaller property by giving up 1 or more bedrooms.	3 or 4	Date approved.

<b>Band 5 with 10 years' residence in Hillingdon and Band 6 without 10 years' residence in Hillingdon</b>				
<b>Case Type</b>		<b>Defining features of applicant or circumstances in which the band applies.</b>	<b>band</b>	<b>Priority Date</b>
<b>Tenants</b>	<b>Home Seekers</b>			

Management Transfer e.g. emergency harassment, domestic violence	Reciprocal agreement for tenants of housing associations or other local	Agreed in exceptional circumstances due to significant problems associated with the tenant's occupation of a dwelling and there is imminent personal risk to the tenant or their family if they remain in the dwelling.	5 or 6	Date approved.
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**- Band 7 with 10 years' residence in Hillingdon and Band 8 without 10 years' residence in Hillingdon**

Case Type		Defining features of applicant or circumstances in which the band applies.	band	Priority Date
Tenants	Home Seekers			
	Homeless households owed a relevant part 7 duty by Hillingdon	In temporary accommodation secured by Hillingdon Council under Part 7 of the Housing Act 1996 but the Landlord wants the temporary accommodation property back <b>AND</b> the council cannot find alternative suitable temporary accommodation	7 or 8	Date approved.
Insanitary or unsatisfactory housing	Insanitary or unsatisfactory housing	1. Closing Order issued (i.e. Properties unfit for human habitation where there is no alternative measure to render the property fit) as advised by Environmental Health.	7 or 8	Date of Closing Order or equivalent
		2. Where emergency re-housing is essential e.g. Compulsory Purchase Order issued to enable site clearance for a road-widening scheme.		
Emergency medical	Emergency medical	1. Granted in exceptional circumstances, where the applicant or a member of the applicant's household has a life-threatening condition, which is seriously affected by their current housing.	7 or 8	Date approved
		2. Granted to hospital bed-blockers i.e. applicant occupying hospital bed because they cannot return to their previous accommodation as it is unsuitable for medical reasons.		



Enable fostering/ adoption	Enable fostering/ adoption	Where agreement has been reached to provide accommodation on recommendation of Social Services and the current accommodation is not suitable or would cause overcrowding.	7 or 8	Date adoption or fostering is approved
Release adapted property in order to make best use of adapted stock.		Adapted properties are in short supply. Where it is no longer required, priority is given for the tenant to move to suitable non-adapted accommodation.	7 or 8	Date approved
	Specific schemes agreed by the	Where there is imminent personal risk to the applicant or their family if they remain in the property or area:	7 or 8	Date approved
	British Armed Forces	Members of the British Armed Forces and have not been dishonourably discharged (Royal Navy, Royal Air Force and British Army)	7 or 8	Date approved
	Young People leaving care.	Agreed at Care Experienced Young People's panel that applicant needs social housing to meet their ongoing support needs.	7 or 8	Date approved by Panel.

	Move-on from single homeless supported housing	Agreed at Single Homeless move-on panel that applicant needs social housing	7 or 8	Date approved
	Move-on from other supported housing	Ready and approved for independent living (after a minimum of 6 months). Includes institutional care, supported housing or hostels and group homes	7 or 8	Date approved
	Ex-service tenants	Ex-service tenants e.g. caretakers or sheltered wardens who have to leave their home on retirement, redundancy or redeployment, where the council has a contractual obligation to rehouse.	7 or 8	Date informed of retirement, redundancy or redeployment by personnel

**Band 9 with 10 years' residence in Hillingdon and Band 10 without 10 years' residence in Hillingdon**

<b>Case Type</b>		<b>Defining features of applicant or circumstances in which the band applies.</b>	<b>Band</b>	<b>Priority Date</b>
<b>Tenants</b>	<b>Home Seekers</b>			
	Homeless households owed a relevant Part 7 duty by Hillingdon Council as defined at	Homeless households accommodated in Bed & Breakfast, council hostel accommodation or women's refuge.	9 or 13	Date of homelessness acceptance.

	Those who are homeless within the meaning of Part 7 of the Housing Act 1996 (as amended).	Require urgent rehousing as a result of domestic abuse.	9 or 13	Date approved
Insanitary or unsatisfactory housing for dependent children.	Insanitary or unsatisfactory housing for dependent children.	1. Households with dependent children living in unsanitary or unsatisfactory housing that cannot be addressed by Environmental Health action.	9 or 10	Date approved
		2. People with children who are living in Colley House which was purpose-built for single people		
Statutory or severe overcrowding	Statutory or severe overcrowding	1. Statutory overcrowding as defined in Part X of Housing Act 1986	9 or 10	Date approved
		2. Where a household is lacking two or more bedrooms	9 or 10	Date approved
Medical (including mental health) hardship	Medical (including mental health) hardship	Where an applicant's or a member of the household's current housing conditions are having a major adverse effect on their medical condition. It will not apply where the effect of housing conditions on health is comparatively moderate, slight or variable.	9 or 10	Date approved

Hardship grounds	Hardship grounds	Urgent need to move agreed by Hardship Panel in liaison with other welfare agencies:	9 or 10	Date approved by Panel.
		To give or receive care or support, for example: Where rehousing of a relative or friend will directly lead to the discharge of a resident from care.		
		For child protection reasons, for example: Where the household includes a child or young person for whom the council has a duty under the Children Act 1989 and rehousing is an essential element in fulfilling that duty.		
		Need to move to take up a confirmed offer of permanent employment		
		Where a household has more than one serious need and when combined, it has a major adverse effect on their current housing condition		
Other decants		If major works of a less urgent nature are to be carried out, council tenants may be offered alternative accommodation and will have the option of returning to their original home once the works have been completed.	9 or 10	Date approved
	Ex-tenant discharged from institution	Where a commitment has previously been made in order that such tenants relinquish their council tenancy on entering the institution	9 or 10	Date new housing application approved

Relinquishing more than one property		Where an agreement has been reached for two tenants to relinquish their separate tenancies in return for one property	9 or 10	Date approved
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Band 11 with 10 years' residence in Hillingdon and Band 12 without 10 years' residence in Hillingdon				
Case Type		Defining features of applicant or circumstances in which the band applies.	Band	Priority Date
Tenants	Home Seekers			
	Homeless Households owed a relevant Part 7 duty by Hillingdon Council as defined at section 12.1 not included in A or B, or other homeless households or those threatened with homelessness and owed a duty under section 195(2) Housing Act	Accepted homeless who are in other forms of temporary accommodation or has no accommodation.	11 or 13	Date of homelessness acceptance or date approved.
Unsanitary or unsatisfactory housing conditions.	Unsanitary or unsatisfactory housing conditions.	Unsanitary or unsatisfactory housing conditions that cannot be addressed by Environmental Health action.	11 or 12	Date approved

Overcrowding	Overcrowding	Overcrowded households lacking one bedroom.	11 or 12	Date approved
Medical (incl. Mental health) hardship	Medical (incl. Mental health) hardship	Where an applicant or member of the household's current housing conditions are having a moderate effect on their medical condition.	11 or 12	Date approved
Hardship grounds	Hardship grounds	Out of borough applicants with a need to move to Hillingdon for medical or support reasons.	11 or 12	Date approved by Panel.
Older residents approved for Sheltered housing	Older residents approved for Sheltered housing	Applicants over 60 years old that have applied only for sheltered accommodation and have no other reason warranting a higher band.	11 or 12	Date approved

<b>Band13 without 10 years' residence in Hillingdon</b>				
<b>Case Type</b>		<b>Defining features of applicant or circumstances in which the band applies.</b>	<b>Band</b>	<b>Priority Date</b>
<b>Tenants</b>	<b>Home Seekers</b>			
	Homeless households owed a relevant Part 7 duty as defined in section 12.1	<b>In temporary accommodation secured by the Council under Part 7 of the Housing Act 1996 but the</b> Landlord wants the temporary accommodation property back and the Council cannot find alternative suitable temporary accommodation	13	Date approved

	Homeless households owed a relevant Part 7 duty as defined in section 12.1 by Hillingdon *	Homeless households accommodated in Bed & Breakfast Council hostel accommodation or woman's refuge	13	Date of homelessness acceptance
	Homeless not included in either of the above categories	Accepted homeless who are in other forms of temporary accommodation, or has no accommodation, including those owed a prevention or relief duty.	13	Date of application

**Band14 without 10 years' residence in Hillingdon**

<b>Case Type</b>	<b>Defining features of applicant or circumstances in which the band applies.</b>	<b>Band</b>	<b>Priority Date</b>
Homeseeker	Within a reasonable preference group and own or have an interest in a property and have savings over £30,000	14	Date of application



## ANNEX 1

### **People ineligible for an allocation of accommodation by the Council**

The Allocation of Housing and Homelessness (Eligibility) England Regulations 2006 set out the eligibility criteria for allocation of housing accommodation.

#### ***Persons from abroad***

*A person may not be allocated accommodation under Part 6 if he or she is a person from abroad who is ineligible for an allocation under s.160ZA of the 1996 Act. There are two categories for the purposes of s.160ZA:*

- (i) a person subject to immigration control - such a person is not eligible for an allocation of accommodation unless he or she comes within a class prescribed in regulations made by the Secretary of State (s.160ZA(2)), and*
- (ii) a person from abroad other than a person subject to immigration control - regulations may provide for other descriptions of persons from abroad who, although not subject to immigration control, are to be treated as ineligible for an allocation of accommodation (s.160ZA(4)).*

#### ***Persons subject to immigration control***

*The term 'person subject to immigration control' is defined in s.13(2) of the Asylum and Immigration Act 1996 as a person who under the Immigration Act 1971 requires leave to enter or remain in the United Kingdom (whether or not such leave has been given).*

*The provisions of section 7(1) of the Immigration Act 1988 and the Asylum and Immigration Act 1996 have been saved for the purpose of housing legislation to protect the rights of EEA citizens, and their family members, who have citizens' rights pursuant to the Withdrawal Agreement.*

*This will ensure that EEA citizens, and their family members, who*

- 1) have acquired limited leave to enter and remain in the UK (also known as pre-settled status) by virtue of Appendix EU of the Immigration Rules ("the EU Settlement Scheme"); or*
- 2) were frontier working in the UK prior to 31 December 2020.*

*will continue to be treated as 'persons not subject to immigration control' in the instances where they would previously have been, so that their eligibility for the allocation of social housing can be judged on the basis of Regulation 4 of the Eligibility Regulations as was the case prior to 31 December 2020.*

(Allocation of accommodation: guidance for local housing authorities in England, June 2012 last updated October 2023)



## RESIDENTS' SERVICES SELECT COMMITTEE - CABINET FORWARD PLAN

<b>Committee name</b>	Residents' Services Select Committee
<b>Officer reporting</b>	Liz Penny, Democratic Services Officer
<b>Papers with report</b>	Appendix A – Latest Forward Plan
<b>Ward</b>	As shown on the Forward Plan

### HEADLINES

To monitor the Cabinet's latest Forward Plan which sets out key decisions and other decisions to be taken by the Cabinet collectively and Cabinet Members individually over the coming year. The report sets out the actions available to the Committee.

### RECOMMENDATION

**That the Residents' Services Select Committee notes the Cabinet Forward Plan.**

### SUPPORTING INFORMATION

The Cabinet Forward Plan is published monthly, usually around the first or second week of each month. It is a rolling document giving the required public notice of future key decisions to be taken. Should a later edition of the Forward Plan be published after this agenda has been circulated, Democratic Services will update the Committee on any new items or changes at the meeting.

As part of its Terms of Reference, each Select Committee should consider the Forward Plan and, if it deems necessary, comment as appropriate to the decision-maker on the items listed which relate to services within its remit. For reference, the Forward Plan helpfully details which Select Committee's remit covers the relevant future decision item listed.

The Select Committee's monitoring role of the Forward Plan can be undertaken in a variety of ways, including both pre-decision and post-decision scrutiny of the items listed. The provision of advance information on future items listed (potentially also draft reports) to the Committee in advance will often depend upon a variety of factors including timing or feasibility, and ultimately any such request would rest with the relevant Cabinet Member to decide. However, the 2019 Protocol on Overview & Scrutiny and Cabinet Relations (part of the Hillingdon Constitution) does provide guidance to Cabinet Members to:

- Actively support the provision of relevant Council information and other requests from the Committee as part of their work programme;
- Where feasible, provide opportunities for committees to provide their input on forthcoming executive reports as set out in the Forward Plan to enable wider pre-decision scrutiny (in addition to those statutorily required to come before committees, *i.e. policy framework documents – see para. below*).

As mentioned above, there is both a constitutional and statutory requirement for Select Committees to provide comments on the Cabinet's draft budget and policy framework proposals after publication. These are automatically scheduled in advance to multi-year work programmes.

Therefore, in general, the Committee may consider the following actions on specific items listed on the Forward Plan:

	<b>Committee action</b>	<b>When</b>	<b>How</b>
1	<b>To provide specific comments to be included in a future Cabinet or Cabinet Member report on matters within its remit.</b>	<p>As part of its pre-decision scrutiny role, this would be where the Committee wishes to provide its influence and views on a particular matter within the formal report to the Cabinet or Cabinet Member before the decision is made.</p> <p>This would usually be where the Committee has previously considered a draft report or the topic in detail, or where it considers it has sufficient information already to provide relevant comments to the decision-maker.</p>	<p>These would go within the standard section in every Cabinet or Cabinet Member report called "Select Committee comments".</p> <p>The Cabinet or Cabinet Member would then consider these as part of any decision they make.</p>
2	<b>To request further information on future reports listed under its remit.</b>	<p>As part of its pre-decision scrutiny role, this would be where the Committee wishes to discover more about a matter within its remit that is listed on the Forward Plan.</p> <p>Whilst such advance information can be requested from officers, the Committee should note that information may or may not be available in advance due to various factors, including timescales or the status of the drafting of the report itself and the formulation of final recommendation(s). Ultimately, the provision of any information in advance would be a matter for the Cabinet Member to decide.</p>	<p>This would be considered at a subsequent Select Committee meeting. Alternatively, information could be circulated outside the meeting if reporting timescales require this.</p> <p>Upon the provision of any information, the Select Committee may then decide to provide specific comments (as per 1 above).</p>
3	<b>To request the Cabinet Member considers providing a draft of the report, if feasible, for the Select Committee to consider prior to it being considered formally for decision.</b>	<p>As part of its pre-decision scrutiny role, this would be where the Committee wishes to provide an early steer or help shape a future report to Cabinet, e.g., on a policy matter.</p> <p>Whilst not the default position, Select Committees do occasionally receive draft versions of Cabinet reports prior to their formal consideration. The provision of such draft reports in advance may depend upon different factors, e.g., the timings required for that decision. Ultimately any request to see a draft report early would need the approval of the relevant Cabinet Member.</p>	<p>Democratic Services would contact the relevant Cabinet Member and Officer upon any such request.</p> <p>If agreed, the draft report would be considered at a subsequent Select Committee meeting to provide views and feedback to officers before they finalise it for the Cabinet or Cabinet Member. An opportunity to provide specific comments (as per 1 above) is also possible.</p>
4	<b>To identify a forthcoming report that may merit a post-decision review at a later Select Committee meeting</b>	<p>As part of its post-decision scrutiny and broader reviewing role, this would be where the Select Committee may wish to monitor the implementation of a certain Cabinet or Cabinet Member decision listed/taken at a later stage, i.e., to review its effectiveness after a period of 6 months.</p> <p>The Committee should note that this is different to the use of the post-decision scrutiny 'call-in' power which seeks to ask the Cabinet or Cabinet Member to formally re-consider a decision up to 5 working days after the decision notice has been issued. This is undertaken via the new Scrutiny Call-in App members of the relevant Select Committee.</p>	<p>The Committee would add the matter to its multi-year work programme after a suitable time has elapsed upon the decision expected to be made by the Cabinet or Cabinet Member.</p> <p>Relevant service areas may be best to advise on the most appropriate time to review the matter once the decision is made.</p>

## BACKGROUND PAPERS

- [Protocol on Overview & Scrutiny and Cabinet relations adopted by Council 12 September 2019](#)
- [Scrutiny Call-in App](#)

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# Scheduled Upcoming Decisions

Ref

Further details

Ward(s)

Final decision by Full Council	Cabinet Member(s) Responsible	Relevant Select Committee	Directorate / Report Author	Consultation related to the decision	NEW ITEM	Public or Private (with reason)
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SI = Standard Item each month/regularly Council Directorate/Service Areas: AS = Adult Services & Health P = Place C = Central Services R = Resources CS= Children's Services D = Digital & Intelligence

## Cabinet meeting - Thursday 10 October 2024 (report deadline 23 September)

186	<b>Draft Uxbridge Town Centre Vision</b>	As part of reviewing the Local Plan, the Council has been looking at the future challenges and opportunities that face Uxbridge, the Borough's largest and only metropolitan town centre. Cabinet will consider commencing full public and stakeholder engagement on a proposed draft new masterplan / vision for Uxbridge, which be the basis for a consensus on the future redevelopment and prosperity of the town.	Uxbridge / all wards		Cllr Eddie Lavery - Residents' Services	Residents' Services	C - Julia Johnson	Public engagement and also select committee		Public
234	<b>REFERRAL FROM FULL COUNCIL: Extending licensing obligations to 3 bedroom HMO properties</b>	On 11 July 2024, the Full Council passed the following motion and will receive a report on the matter: <i>"That this Council recognises the problems caused by unlicensed HMOs in the borough, from anti-social behaviour to poor housing conditions. This Council is committed to ensuring good quality housing in the borough and resolves that a report be sent to Cabinet considering the sufficiency of evidence required under Part 2 Housing Act 2004 to extend licensing obligations to all properties with 3 bedrooms housing multiple unrelated occupants and to commence consultation on the implementation of this additional licensing obligation where it is justified."</i>	All		Cllr Eddie Lavery - Residents' Services	Residents' Services	D - Richard Webb / Stephanie Waterford	Consultation, if required		Public
SI	<b>Strategic Climate Action Plan</b>	Hillingdon Council passed a Climate Change Declaration at its full Council meeting on 16 January 2020 which set out the ambition to become carbon neutral across the Council's services by 2030. The review of the Strategy will provide an update on progress and refine the actions necessary to deliver the carbon neutral target alongside wider climate change aspirations.	All		Cllr Eddie Lavery - Residents' Services	Residents' Services	C - Ian Thynne	Public Consultation / Residents' Services Select Committee		Public
189	<b>Cowley House, Uxbridge</b>	Following consultation with residents, Cabinet will consider the decant and disposal of Cowley House, 181 Cowley High Road Uxbridge UB8 2AJ. Cowley House is a small general needs housing block and a listed building. Cabinet will be advised that it is not viable to bring the property up to the new Landlord Compliance standards, hence the recommendation to dispose of the property.	Uxbridge		Cllr Jonathan Bianco - Property, Highways & Transport / Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Julie Markwell			Private (3)
SI	<b>Public Preview of matters to be considered in private</b>	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		All Cabinet Members	All	C - Democratic Services			Public

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# Scheduled Upcoming Decisions

Further details

Ref

Ward(s)

Final decision by Full Council	Cabinet Member(s) Responsible	Relevant Select Committee	Directorate / Report Author	Consultation related to the decision	NEW ITEM	Public or Private (with reason)
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SI = Standard Item each month/regularly Council Directorate/Service Areas: AS = Adult Services & Health P = Place C = Central Services R = Resources CS= Children's Services D = Digital & Intelligence

## Cabinet Member Decisions expected - October 2024

205	<b>Support services contracts for the Single Homelessness Accommodation Programme</b>	Cabinet Members will consider the award of support services contracts for the Single Homelessness Accommodation Programme (SHAP). SHAP is a £200 million nationwide fund to deliver up to 2400 homes and support services for people sleeping rough or at risk of sleeping rough. The Council is in receipt of external funding for SHAP and an aspect of this programme will be the procurement of services within this, to support this endeavour.	N/A		Cllr Ian Edwards - Leader / Eddie Lavery - Residents' Services	Residents' Services	R - Sally Offin			Private (3)
194	<b>Tenancy Strategy and Policy</b>	Following consultation, the Cabinet Member will consider the Council's Tenancy Strategy and Policy which provides guidance to registered social housing providers and sets out the approach to allocating and managing social housing tenancies, respectively.	All		Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Debbie Weller			Public
193	<b>Private Sector Placement Policy</b>	The Cabinet Member will consider approving an updated policy on placing tenants in temporary accommodation and private rented accommodation.	All		Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Debbie Weller			Public
SI 204	<b>Standard Items taken each month by the Cabinet Member</b>	Cabinet Members make a number of non-key decisions each month on standard items - details of these are listed at the end of the Forward Plan.	Various		All	TBC	C - Democratic Services	Various		Public

## Cabinet meeting - Thursday 7 November 2024 (report deadline 21 October)

240	<b>Contract for the supply and delivery of refuse and recycling bags</b>	This report seeks Cabinet approval of the recommendation to award the contract for supply and delivery of refuse and recycling bags for a period of three years with the option to extend for a further two years (total five years) following a tendering exercise.	All		Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Anna Humphries		NEW ITEM	Private (3)
139b	<b>Housing Allocation Policy</b>	Following public consultation, Cabinet will consider approval of the Housing Allocation Policy, which sets out the Council's policy on how social housing is allocated to those on the housing register.	All		Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Debbie Weller	Public consultation		Public
SI	<b>Public Preview of matters to be considered in private</b>	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		All Cabinet Members	All	C - Democratic Services			Public
SI	<b>Reports from Select Committees</b>	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	All		All	TBC	C - Democratic Services	TBC		Public



Ref	Scheduled Upcoming Decisions	Further details	Ward(s)	Final decision by Full Council	Cabinet Member(s) Responsible	Relevant Select Committee	Directorate / Report Author	Consultation related to the decision	NEW ITEM	Public or Private (with reason)
SI = Standard Item each month/regularly Council Directorate/Service Areas: AS = Adult Services & Health P = Place C = Central Services R = Resources CS= Children's Services D = Digital & Intelligence										
<b>Cabinet Member Decisions expected - November 2024</b>										
SI	<b>Standard Items taken each month by the Cabinet Member</b>	Cabinet Members make a number of non-key decisions each month on standard items - details of these are listed at the end of the Forward Plan.	Various		All	TBC	C - Democratic Services	Various		Public
<b>Cabinet meeting - Thursday 12 Decemer 2024 (report deadline 25 November)</b>										
223b	<b>Taxi control measures around Heathrow Airport</b>	Cabinet will consider the outcome of the consultation, agreed by Cabinet in September, on proposals to control private hire vehicles (taxis) in residential streets around Heathrow Airport and then consider the necessary decisions required.	Heathrow Villages		Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Richard Webb / Stephanie Waterford	Statutory consultation	NEW ITEM	Public
224b	<b>Statement of Gambling Policy (POLICY FRAMEWORK)</b>	Subject to Cabinet's consideration of this in September, and following consultation, Cabinet will consider recommending a reviewed Statement of Gambling Policy to full Council for adoption.	N/A	<b>Proposed Full Council adoption - 16 January 2025</b>	Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Daniel Ferrer / Stephanie Waterford	Licensing Committee & Select Committee along with statutory consultation		Public
SI	<b>Infrastructure Funding Statement</b>	Cabinet will receive an annual report setting out the Council's Infrastructure Funding Statement, a document it is required to publish which also monitors spending on section 106 (developer contribution) monies along with the Community Infrastructure levy over the past year.	All		Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Andrew Tebbutt	Residents' Services Select Committee		Public
SI	<b>The Council's Budget - Medium Term Financial Forecast 2025/26 - 2029/30 (BUDGET FRAMEWORK)</b>	This report will set out the Medium Term Financial Forecast (MTFF), which includes the draft General Fund reserve budget and capital programme for 2025/26 for consultation, along with indicative projections for the following four years. This will also include the HRA rents for consideration and Council Tax Reduction Scheme proposals following consultation.	All	<b>Proposed Full Council adoption - 20 February 2025</b>	Cllr Martin Goddard - Finance	All	R - Richard Ennis	Public consultation through the Select Committee process and statutory consultation with businesses & ratepayers		Public
SI	<b>Public Preview of matters to be considered in private</b>	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		All Cabinet Members	All	C - Democratic Services			Public
SI	<b>Reports from Select Committees</b>	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	All		All	TBC	C - Democratic Services	TBC		Public
<b>Cabinet Member Decisions expected - December 2024</b>										

Ref	Scheduled Upcoming Decisions	Further details	Ward(s)	Final decision by Full Council	Cabinet Member(s) Responsible	Relevant Select Committee	Directorate / Report Author	Consultation related to the decision	NEW ITEM	Public or Private (with reason)
<p style="text-align: center; font-size: small;">SI = Standard Item each month/regularly Council Directorate/Service Areas: AS = Adult Services &amp; Health P = Place C = Central Services R = Resources CS= Children's Services D = Digital &amp; Intelligence</p>										
SI	<b>Standard Items taken each month by the Cabinet Member</b>	Cabinet Members make a number of non-key decisions each month on standard items - details of these are listed at the end of the Forward Plan.	Various		All	TBC	C - Democratic Services	Various		Public
<b>Cabinet meeting - Thursday 9 January 2025 (report deadline 9 December 2024)</b>										
238	<b>The provision of a specialist grounds maintenance, horticultural and landscaping contract</b>	Cabinet will be asked to consider the award of a grounds maintenance, horticultural and landscaping contract for a period of three years with optional extension of a further two years. This contract will support works required by the Green Spaces Team in its parks, gardens and open public spaces and can also be utilised by other Council departments.	All		Cllr Eddie Lavery - Residents' Services	Residents' Services	R - Allison Mayo		NEW ITEM	Private (3)
SI	<b>Public Preview of matters to be considered in private</b>	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		All Cabinet Members	All	C - Democratic Services			Public
SI	<b>Reports from Select Committees</b>	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	All		All	TBC	C - Democratic Services	TBC		Public
<b>Cabinet Member Decisions expected - January 2025</b>										
SI	<b>Standard Items taken each month by the Cabinet Member</b>	Cabinet Members make a number of non-key decisions each month on standard items - details of these are listed at the end of the Forward Plan.	Various		All	TBC	C - Democratic Services	Various		Public
<b>Cabinet meeting - Thursday 13 February 2025 (report deadline 27 January 2025)</b>										
SI	<b>The Council's Budget - Medium Term Financial Forecast 2025/26 - 2029/30 (BUDGET FRAMEWORK)</b>	Following consultation, this report will set out the Medium Term Financial Forecast (MTFF), which includes the draft General Fund reserve budget and capital programme for 2025/26 for consultation, along with indicative projections for the following four years. This will also include the HRA rents for consideration.	All	Proposed Full Council adoption - 20 February 2025	Cllr Ian Edwards - Leader of the Council / Cllr Martin Goddard - Finance	All	R - Richard Ennis	Public consultation through the Select Committee process and statutory consultation with businesses & ratepayers		Public
SI	<b>Public Preview of matters to be considered in private</b>	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		All Cabinet Members	All	CS - Democratic Services			Public
SI	<b>Reports from Select Committees</b>	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	All		All	TBC	CS - Democratic Services	TBC		Public

Ref	Scheduled Upcoming Decisions	Further details	Ward(s)	Final decision by Full Council	Cabinet Member(s) Responsible	Relevant Select Committee	Directorate / Report Author	Consultation related to the decision	NEW ITEM	Public or Private (with reason)
SI = Standard Item each month/regularly Council Directorate/Service Areas: AS = Adult Services & Health P = Place C = Central Services R = Resources CS= Children's Services D = Digital & Intelligence										
<b>Cabinet Member Decisions expected - February 2025</b>										
SI	Standard Items taken each month by the Cabinet Member	Cabinet Members make a number of non-key decisions each month on standard items - details of these are listed at the end of the Forward Plan.	Various		All	TBC	CS - Democratic Services	Various		Public
<b>Cabinet meeting - Thursday 13 March 2025 (report deadline 24 February)</b>										
SI	Public Preview of matters to be considered in private	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		All Cabinet Members	All	CS - Democratic Services			Public
SI	Reports from Select Committees	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	All		All	TBC	CS - Democratic Services	TBC		Public
<b>Cabinet Member Decisions expected - March 2025</b>										
SI	Standard Items taken each month by the Cabinet Member	Cabinet Members make a number of non-key decisions each month on standard items - details of these are listed at the end of the Forward Plan.	Various		All	TBC	CS - Democratic Services	Various		Public
<b>Cabinet meeting - Thursday 10 April 2025 (report deadline 24 March)</b>										
SI	Public Preview of matters to be considered in private	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		All Cabinet Members	All	C - Democratic Services			Public
SI	Reports from Select Committees	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	Various		All	TBC	C - Democratic Services	Various		Public
<b>Cabinet Member Decisions expected - April 2025</b>										
SI	Standard Items taken each month by the Cabinet Member	Cabinet Members make a number of decisions each month on standard items - details of these standard items are listed at the end of the Forward Plan.	Various		All	TBC	C - Democratic Services	Various		Public
<b>Cabinet meeting - Thursday 22 May 2025 (report deadline 2 May)</b>										
SI	Reports from Select Committees	Reports, findings and recommendations for consideration by the Cabinet, when referred from the appropriate Committee.	Various		All	TBC	C - Democratic Services	Various		Public
SI	Public Preview of matters to be considered in private	A report to Cabinet to provide maximum transparency to residents on the private and confidential matters to be considered later in Part 2 of the Cabinet meeting and agenda.	TBC		All Cabinet Members	All	C - Democratic Services			Public

**Scheduled  
Upcoming  
Decisions**

**Further details**

Ref

Ward(s)

Final decision by Full Council	Cabinet Member(s) Responsible	Relevant Select Committee	Directorate / Report Author	Consultation related to the decision	NEW ITEM	Public or Private (with reason)
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SI = Standard Item each month/regularly Council Directorate/Service Areas: AS = Adult Services & Health P = Place C = Central Services R = Resources CS= Children's Services D = Digital & Intelligence

**Cabinet Member Decisions expected - May 2025**

SI	<b>Standard Items taken each month by the Cabinet Member</b>	Cabinet Members make a number of decisions each month on standard items - details of these standard items are listed at the end of the Forward Plan.	Various		All	TBC	C - Democratic Services	Various		Public
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**CABINET MEMBER DECISIONS: Standard Items (SI) that may be considered each month**

SI	<b>Urgent Cabinet-level decisions &amp; interim decision-making (including emergency decisions)</b>	The Leader of the Council has the necessary authority to make decisions that would otherwise be reserved to the Cabinet, in the absence of a Cabinet meeting or in urgent circumstances. Any such decisions will be published in the usual way and reported to a subsequent Cabinet meeting for ratification. The Leader may also take emergency decisions without notice, in particular in relation to the COVID-19 pandemic, which will be ratified at a later Cabinet meeting.	Various		Cllr Ian Edwards - Leader of the Council	TBC	C - Democratic Services	TBC		Public / Private
SI	<b>Release of Capital Funds</b>	The release of all capital monies requires formal Member approval, unless otherwise determined either by the Cabinet or the Leader. Batches of monthly reports (as well as occasional individual reports) to determine the release of capital for any schemes already agreed in the capital budget and previously approved by Cabinet or Cabinet Members	TBC		Cllr Martin Goddard - Finance (in conjunction with relevant Cabinet Member)	All - TBC by decision made	various	Corporate Finance		Public but some Private (1,2,3)
SI	<b>Petitions about matters under the control of the Cabinet</b>	Cabinet Members will consider a number of petitions received by local residents and organisations and decide on future action. These will be arranged as Petition Hearings.	TBC		All	TBC	C - Democratic Services			Public
SI	<b>To approve compensation payments</b>	To approve compensation payments in relation to any complaint to the Council in excess of £1000.	n/a		All	TBC	R - Richard Ennis			Private (1,2,3)
SI	<b>Acceptance of Tenders</b>	To accept quotations, tenders, contract extensions and contract variations valued between £50k and £500k in their Portfolio Area where funding is previously included in Council budgets.	n/a		Cllr Ian Edwards - Leader of the Council OR Cllr Martin Goddard - Finance / in conjunction with relevant Cabinet Member	TBC	various			Private (3)

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## Scheduled Upcoming Decisions

Ref

Further details

Ward(s)

				Final decision by Full Council	Cabinet Member(s) Responsible	Relevant Select Committee	Directorate / Report Author	Consultation related to the decision	NEW ITEM	Public or Private (with reason)
SI = Standard Item each month/regularly Council Directorate/Service Areas: AS = Adult Services & Health P = Place C = Central Services R = Resources CS= Children's Services D = Digital & Intelligence										
SI	<b>All Delegated Decisions by Cabinet to Cabinet Members, including tender and property decisions</b>	Where previously delegated by Cabinet, to make any necessary decisions, accept tenders, bids and authorise property decisions / transactions in accordance with the Procurement and Contract Standing Orders.	TBC		All	TBC	various			Public / Private (1,2,3)
SI	<b>Chrysalis Programme of Environmental Improvements</b>	The Cabinet Member will be asked to consider the approval of projects.	Various		Cllr Eddie Lavery - Residents' Services	Residents' Services	P - Neil O'Connor			Public
SI	<b>External funding bids</b>	To authorise the making of bids for external funding where there is no requirement for a financial commitment from the Council.	n/a		All	TBC	various			Public
SI	<b>Response to key consultations that may impact upon the Borough</b>	A standard item to capture any emerging consultations from Government, the GLA or other public bodies and institutions that will impact upon the Borough. Where the deadline to respond cannot be met by the date of the Cabinet meeting, the Constitution allows the Cabinet Member to sign-off the response.	TBC		All	TBC	various			Public

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## RESIDENTS' SERVICES SELECT COMMITTEE - WORK PROGRAMME

<b>Committee name</b>	Residents' Services Select Committee
<b>Officer reporting</b>	Liz Penny, Democratic Services Officer
<b>Papers with report</b>	Appendix A – Work Programme
<b>Ward</b>	All

### HEADLINES

To enable the Committee to note future meeting dates and to forward plan its work for the current municipal year.

### RECOMMENDATION:

**That the Residents' Services Select Committee considers the Work Programme report and agrees any amendments.**

### SUPPORTING INFORMATION

- The Committee's meetings will start at 7pm and the witnesses attending each of the meetings may include representatives from external organisations, some of whom travel from outside of the Borough. Forthcoming meeting dates are as follows:

Meeting Date	Room
<del>13 June 2024</del>	CR5
<del>18 July 2024</del>	CR6
24 September 2024	CR6
27 November 2024	CR5
14 January 2025	CR5
19 February 2025	CR5
13 March 2025	CR5
22 April 2025	CR5

### Site Visits

Members of the Residents' Services Select Committee have undertaken a number of site visits in recent months to include the CCTV room in the Civic Centre, Harlington Road Depot, Heathrow Imported Food Office, Hillingdon Fire Station, Botwell Leisure Centre, Breakspear Crematorium and the Recycling Centre at Edmonton.

### Implications on related Council policies

The role of the Select Committees is to make recommendations on service changes and improvements to the Cabinet, who are responsible for the Council's policy and direction.

### How this report benefits Hillingdon residents

Select Committees directly engage residents in shaping policy and recommendations and the Committees seek to improve the way the Council provides services to residents.

**Financial Implications**

None at this stage.

**Legal Implications**

None at this stage.

**BACKGROUND PAPERS**

Nil.



# MULTI-YEAR WORK PROGRAMME 2022 - 2026

	2024/25										2025/26	
	May No meeting	June 13	July 18	September 24	November 27	January 14	February 19	March 13	April 22	May No meeting	June TBC	July TBC
<b>Residents' Services Select Committee</b>												
<b>Review: Homeless Prevention and the Customer Journey</b>												
Topic selection / scoping stage												
Witness / evidence / consultation stage												
Findings, conclusions and recommendations												
Final review report agreement												
Target Cabinet reporting												
<b>Regular service &amp; performance monitoring</b>												
Infrastructure Funding Statement Update (previously CIL Expenditure Monitoring - Annual Report & S106) each November												
Mid-year budget / budget planning report												
Strategic Climate Action Plan: Annual Update (to move to November annually to align with Cabinet reporting in October)												
Cabinet's Budget Proposals For Next Financial Year												
Cabinet Forward Plan Monthly Monitoring												
Review of Parking Annual Report												
Annual Complaints Submission to the Housing Ombudsman Service (Rod Smith/Debbie W)												
<b>One-off information items</b>												
ASB Service Update (with updated FPN figures)												
Graffiti Removal												
Sports - facilities, engagement & inclusivity												
Animal Welfare												
Consultation on Uxbridge Master Plan												
Housing Allocation Policy Consultation Draft												
Heathrow Expansion & Local Community Update												
Abandoned Vehicles												
<b>Regeneration of Town Centres (Chambers of Commerce, Hayes T Partnership, Uxb BID)</b>												
Success of Chrysalis Project												
Traffic Standards - Tackling Underage Drinking / Vaping												
Licensing of Fun Fairs and enforcement measures available for flyposting												
Community Payback Scheme - structure of the Scheme												
Noise Team Structure and success of enforcement measures												
Review of Statement of Gambling Policy - policy framework consultation												
Sport for Young People - how the Council encourages participation in deprived areas												
<b>Crime &amp; Disorder - Statutory Scrutiny (themed)</b>												
Safer Hillingdon Partnership Development												
Safer Hillingdon Partnership Performance												
<b>Past review delivery</b>												
Review of Alley Gating												
<b>Internal use only</b>												
Date deadline confirmed to report authors												
Report deadline												
Agenda publication date												

Committee Site Visits (dates tbc)
CCTV Control Room - Civic Centre (25 July 2022)
Botwell Leisure Centre (27 February 2024)
Harlington Road Depot (28 September 2022)
Weed Killing Contractor (6 June 2023)
Heathrow Airport (Imported Food Office) (4 October 2022)
Noise Team
Hillingdon Fire Station (7 December 2022)
Graffiti Removal
Breakspear Crematorium (25 January 2023)
Harefield and Yiewsley Civic Amenity Sites
Traffic wardens / Abandoned Vehicles *
Canal Visit - 1 November 2023
The Battle of Britain Bunker (26 July 2023 at 6pm)
Building Control
Planning Enforcement
HS2 Site Visit
Dogs Trust
Edmonton Recycling Centre (Tuesday 4 September 2024 - 09:45 - 10:45)
Custody Suite - Polar Park, Heathrow
Uxbridge / Ruislip Lido

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