

PRIVATE SECTOR RENEWAL POLICY

Update April 2018



For further information contact the Environmental Health and Licensing Service, Town Hall, Watford, Hertfordshire, WD17 3EX
Telephone **01923 278503** or email envhealth@watford.gov.uk

watford.gov.uk



[watfordcouncil](https://www.watfordcouncil.gov.uk)



WATFORD
BOROUGH
COUNCIL

Contents

1.0	Executive Summary.....	1
Background to the Update of the Private Sector Housing Renewal Policy		
1.1	Background to the Update of the Private Sector Housing Renewal Policy.....	4
1.2	Key Housing Strategy Policy Areas and Influences to the Housing Agenda.....	6
1.2.1	Private rented sector.....	6
1.2.2	Central Government policy on addressing health inequalities.....	6
1.2.3	Regional strategy on addressing health inequality - Joint Strategic Needs Assessment (JSNA) and Joint Health and Wellbeing Strategies.....	7
1.2.4	Energy Act 2011.....	9
1.2.5	Empty homes.....	9
1.2.6	Housing Act 2004.....	9
1.2.7	The Housing and Planning Act 2016.....	10
1.2.8	The Smoke and Carbon Monoxide Alarm (England) Regulations 2015.....	10
1.2.9	The Welfare Reform and Work Act 2016 and the Welfare Reform Act 2012.....	11
1.2.10	Localism Act 2011.....	11
1.2.11	Energy Efficiency - The Energy Company Obligation (ECO).....	12
1.2.12	The Home Energy Conservation Act (HECA).....	12
1.2.13	Fuel Poverty Strategy.....	13
Building Research Establishment Modelling		
2.0	BRE Modelling.....	15
Consultation		
3.0	Consultation Analysis.....	17
3.1	Survey with Watford residents.....	17
3.2	The Internal Survey (Council staff).....	18
Structure, Aim, Framework and Principles of the policy		
4.0	Structure of the policy.....	21
5.0	Policy Aim.....	21
6.0	Policy Framework.....	21
6.1	The Councils Vision.....	21
7.0	Policy Principles and Priorities.....	22
7.1	Principles.....	22
7.2	Priorities.....	24
8.0	Discussion and Reasons for Choosing These Priorities & Principles.....	25
Policy Delivery		
9.0	Targeting resources to achieve policy priorities.....	32
10.0	Tools to achieve the Policy.....	33
10.1	Promoting and Enabling.....	33
10.2	Direct Assistance Offered Through the Policy.....	35
10.2.1	Discretionary Assistance.....	35
10.2.2	Safer Homes Grant (SHG).....	37

10.2.3	Safer Homes loan (SHL).....	38
10.2.4	Project Loan or Grant (PL or PG).....	39
10.3	Trusted Advice	42
10.4	Mandatory Assistance.....	42
10.4.1	Disabled Facilities Grants (DFG's – Mandatory Direct Financial Assistance).....	42
10.4.2.1	Rented Properties (private and social).....	43
11.0	Fees and Charges	44
12.0	Eligibility and Conditions for Assistance.....	44
12.1	Applications for Assistance in Exceptional Circumstances.....	44
Service Standards		
13.0	Service Standards.....	45
14.0	Complaints and Appeals.....	45
14.1	Complaints	45
14.2	Appeals.....	46
15.0	Review of this policy	47
Appendices		
	APPENDIX A - CONDITIONS FOR ALL FINANCIAL ASSISTANCE	48
	APPENDIX B - CONDITIONS FOR SAFER HOMES GRANT (SHG).....	53
	APPENDIX C - SAFER HOMES LOAN (SHL)	55
	APPENDIX D - PROJECT LOAN/GRANT.....	58
	APPENDIX E - DISPOSAL	59
	APPENDIX F - DEFINITION OF VULNERABLE.....	61
	APPENDIX G - CONSULTATION (summary).....	55

1.0 Executive Summary

This policy is an update to the Watford Borough Council's Private Sector Renewal Policy which was last updated in 2006. The 2006 surveys principles and approach were informed by the 2004 stock condition survey information. This current update uses the very detailed 2017 Stock Modelling and a Health Impact Assessment (HIA) carried out for the council by the Building Research Establishment (BRE). The stock modelling makes use of the vast amount of data about homes in the borough now accessible and more widely available and gives the council a much clearer picture of the condition of the housing stock in Watford.

Headline modelling shows that Watford has 39,157 dwellings. Of these 56% are owner occupied, 28% private rented and 16% are social rented. Over the last 10 years there has been significant growth in Watford's population and dwelling numbers, as well as the proportion of homes within the rented sector. The rented sector has a higher proportion of fuel poverty and lower income households than owner occupied dwellings. In addition the private rented sector dwellings have an increased element of disrepair. These issues are further exasperated within the Houses in Multiple Occupation (HMO's), which represent 4% of the housing stock in Watford.

There is now evidence which shows the strong link between poor housing and poor physical and mental health. The government's white paper "[Choosing Health](#)" states that the key to success in health inequalities will be effective local partnerships led by councils and the NHS working to a common purpose. Housing is a key determinant of health, and poor housing conditions continue to cause preventable deaths and contribute to health inequalities. In Watford (and nationally) 'Falls' and 'Excess cold' are by far the most common housing related defects in the home that affect health.

The aim of this policy is to improve and maintain private sector housing standards in Watford, to promote health, wellbeing and sustainability in which available resources are targeted at those most in need.

The basis for all assistance is to remove or reduce housing related defects that are detrimental to an occupant's health, in terms of physical and mental wellbeing.

This policy supports the Councils vision in the Corporate Plan and contributes to its priorities, namely, its number one priority to manage the borough's housing needs as well as providing for its vulnerable and disadvantaged communities. It also contributes to the priority of championing smart growth and economic prosperity by helping homes to become more energy efficient with cheaper bills. This policy forms part of the council's Housing Strategy 2015-2020.

With limited resources the policy seeks to provided added value and greater impact by making use of external and other sources of funding in conjunction with exploiting the opportunities to work with our partners. The council already has an excellent track record in this area such as using Energy Company Obligation funding and government grants and initiatives to improve housing conditions in Watford. Current financial

assistance is limited in its reach and ability to help large numbers of residents. To broaden the number of people it can help, the policy will use a pro-active project based approach for some of the financial assistance. . The council now has more information available on housing conditions in the borough and can specifically target projects based on housing characteristics and household need. Alongside this project based approach, other individual grants and loans will be targeted at our most vulnerable residents with applications for assistance via a referral from a housing or health based professional.

As well as making substantial savings to the NHS and to society, this policy has the potential to improve economic prosperity and also reduce the demands for services provided by the council.

Background to the Update of the Private Sector Housing Renewal Policy

1.1 Background to the Update of the Private Sector Housing Renewal Policy

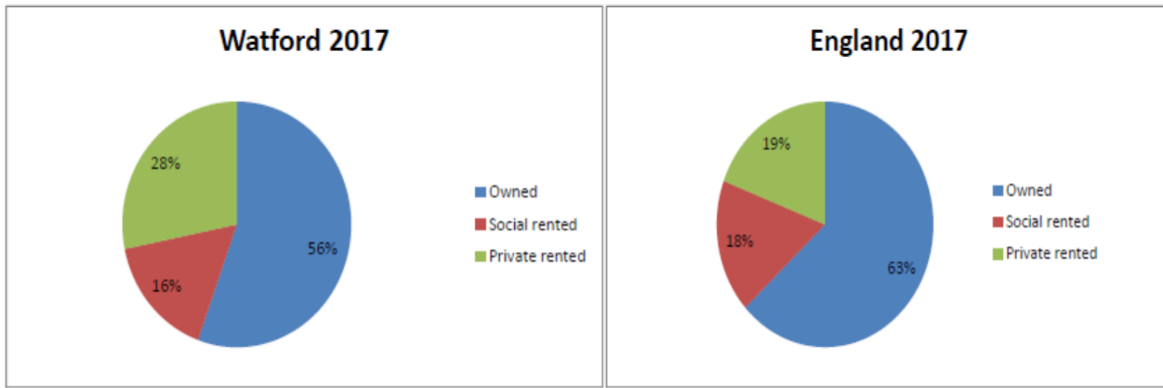
Watford Borough Council's first Private Sector Housing Renewal Policy (PSHRP) was written, following the Regulatory Reform (Housing Assistance, England and Wales) Order 2002, was adopted in April 2003. A revision followed in 2006. It was developed using mainly information from a Private Sector House Condition Survey, last carried out in 2004.

Under the [Housing Act 2004](#) Local Authorities are required to understand the condition of their housing stock and to develop strategies/approaches to address issues of concern. The Act states that: *"A Local Authority (LA) must keep the housing conditions in their area under review with a view to identifying any action that may need to be taken by them"*.

Since 2006 there is now significantly more data available, both freely and for purchase on aspects of housing in local authority (LA) areas. The council also keeps its own records on housing conditions in the borough and has incorporated it into its Geographical Information System (GIS) mapping. Making use of this wealth of data, the BRE has developed an alternative to the traditional House Condition Survey, known as the Housing Stock Modelling Service. This modelling adds to our own information and is used in conjunction with a number of recognised high quality national surveys and data sources, including the English House Condition Survey. Data is then extrapolated down to the local area level by establishing relationships between the national survey data and local area data such as the census and credit rating data. The BRE report provides statistical information about housing conditions and the occupants of those houses which can then be used to inform local housing strategies, policies and programmes. Further information on the survey is referenced in 1.3 and throughout this policy.

The council also commissioned BRE to produce a Health Impact Assessment (HIA). The HIA report highlights the potential impact of intervention measures, shows the likely savings in terms of health costs and provides a cost benefit analysis of interventions over a 10 year period. The HIA will be a useful tool in evaluating outcomes of activities under the Health and Social Care Act 2012 including the impact of Health & Wellbeing Boards' activities.

The BRE 2017 stock model identified a number of housing statistics which have been referenced throughout this document. Headline modelling shows that Watford has 39,157 dwellings. Of these 56% are owner occupied, 28% private rented and 16% are social rented. There has been a large increase in the number of dwellings over the last 10 years (a 10% increase compared to Hertfordshire and England averages at 6%). The greatest change in dwelling tenure is in the private rented sector. Compared to the region and England averages Watford's private rented sector is more in keeping with a London based authority, which relates to the position of the town as a commuting borough and is reflected in the high costs of housing in Watford.



Increases to Watford's population have also been ahead of national and regional averages. In the same 10 year period 2007 to 2017 there has been a 14% increase to 96,800 people, compared to 8% growth for the east of England and a 7% increase for Great Britain.

The population increases in Watford are being supported in part by significant large scale housing developments that are in the process of being built. Some of these include:

- 1) The proposed housing developed by Hart Homes - a joint venture partnership between the council and Watford Community Housing Trust. This scheme received planning for 36 residential apartments and 40 dwellings for temporary accommodation (built on the land off Tolpits Lane in Watford). The apartments include a mixture of one- and two-bedroom homes, the majority of which will be available for affordable rent.
- 2) 408 Homes and a retirement village are planned at the first development for the Riverwell site (part of the Watford Health Campus site).
- 3) Watford Junction and Clarendon Road schemes have proposals and pre planning applications for flats and a high rise development (The building will be 23 stories, providing 154 new homes).
- 4) A proposal for nearly 500 homes in Ascot Road (including a tower block).

Some of the developments are also complemented by policies such as the Build to Rent and the New Homes Bonus are aimed at increasing the supply of properties. As the private rented sector is already growing in Watford it is reasonable to assume that many of the new properties being built will be rented to private tenants. This is likely to increase the demand for services placed upon the Council in this area.

1.2 Key Housing Strategy Policy Areas and Influences to the Housing Agenda

1.2.1 Private rented sector

There has been significant growth in the private rented sector in Watford in recent years, from 9% of the total stock in 2001 to 21% in 2011. The sector now stands at 28% in 2017. National statistics data estimates England’s average to have had a 19% growth.

The BRE data shows us that in Watford the private rented sector is broadly the same as the owner occupied sector in terms of the proportion of properties containing category 1 hazards (15% against 16%). However there are more noticeable differences between the private rented and owner occupied sectors on disrepair, proportions of low income households and those in fuel poverty. The private rented sector performs less favorably in all these areas compared to the owner occupiers. This is shown in the table below:

	Private Sector Stock in Watford			
	Owner Occupied		Private Rented	
	No	%	No	%
No of dwellings	21,747	-	11,040	-
Disrepair	592	3%	527	5%
Fuel Poverty (Low income, high cost)	1,058	5%	1,151	10%
Low income households	1,633	8%	1,490	13%

Another area often associated with low income and fuel poor households are Houses in Multiple Occupation (HMOs). Watford has an estimated 1,600 HMOs. This number is above the national average but not unexpected for the area as it is influenced by high housing demand and housing costs associated with London and the south.

In Watford the proportions of households on low income and who are in fuel poverty within the stock as a whole are between 3% and 4%. Within the HMOs the proportions of households in these categories is significantly higher at 14% and 15%.

1.2.2 Central Government policy on addressing health inequalities

The government's white paper "[Choosing Health](#)" states that the key to success in health inequalities will be effective local partnerships led by local government and the NHS working to a common purpose. Housing is a key determinant of health, and poor housing conditions continue to cause preventable deaths and contribute to health inequalities. This is set out in the report '[The health impacts of poor private sector housing, LACORS, 2010](#)'.

It has been recognised by central government that to fully address the health needs of the population, services need to become more integrated and there needs to be better communication between different providers. Housing is a key aspect of this.

The report, [Integrated Care: Our Shared Commitment, Department of Health, 2013](#), states that "Many people with mental and physical disabilities, complex needs, long-term conditions and terminal illness also need to access different health care, social care,

housing and other services, such as education, and often simultaneously".

It is therefore essential that departments providing or regulating housing work with other council departments and health organisations to provide services that are integrated and take full account of the needs of the individual.

The Public Health Outcomes Framework, "[Healthy lives, healthy people: Improving outcomes and supporting transparency](#)", sets out desired outcomes for public health and how they will be measured. Local authorities must have regard to these documents in the exercise of their public health functions.

Many of the measurements have links to housing, some of the more relevant being:

- Falls and injuries in over 65's
- Fuel poverty
- Excess winter deaths

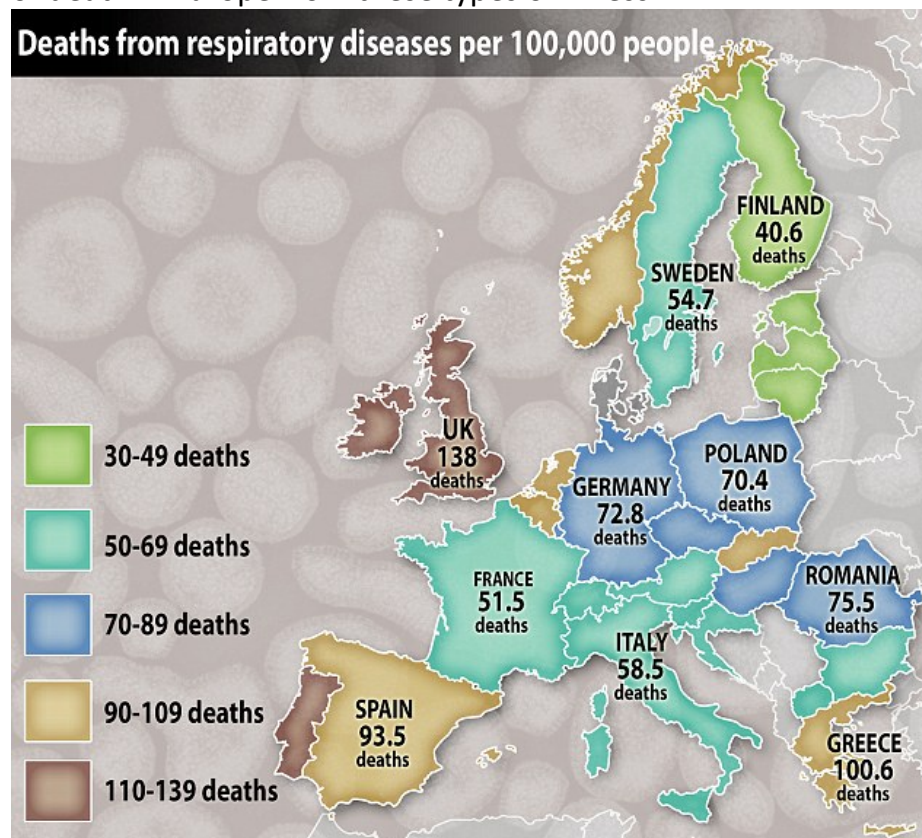
1.2.3 Regional strategy on addressing health inequality - Joint Strategic Needs Assessment (JSNA) and Joint Health and Wellbeing Strategies

Hertfordshire County Council's JSNA and Joint Health and Wellbeing Strategy require local Health and Wellbeing boards to analyse the health needs of their local populations and decide how to make best use of collective resources to achieve the priorities that are formed from these. (See the Department of Health document [Joint Strategic Needs Assessment and joint health and wellbeing strategies explained - Commissioning for populations](#)).

Hertfordshire's current [JNSA](#) profiles that are most relevant to Housing are:

- a) [Housing Quality & Health](#) which outlines the evidence of poor housing and its association with poor physical and mental health. In Watford around 14% (5,640) of properties have a category 1 hazard and 1,215 properties have an incidence of disrepair (both comparing similarly to the national average).
- b) [Environmental Health](#) Practitioners (EHPs). Environmental Health practitioners and Environmental Health Officers (EHOs) operate at a district level and are the only health practitioners in local government who view health holistically, focusing on maintaining health rather than curing illness. Their professional strength lies in the ability to make essential links between environmental stressors and ill health prevention. Their role includes the enforcement of housing standards and therefore they have a key part to play in maintaining and improving quality of life and contributing to a range of health outcomes. Poor quality housing can have significant negative effects on many health problems including respiratory illness, hypothermia, heart attacks and strokes. These negative effects have more significance for older vulnerable people, for example, conditions such as arthritis can be exacerbated by cold and damp conditions which in turn increase the risk of falls. Associated stress and anxiety caused by substandard housing can also increase the risk of mental health conditions. Cold or overcrowded

conditions can have negative effects on children’s educational development and achievement which presents a risk for their long-term opportunities of sustained employment. [The cold weather plan for England](#) underlines the link between poor housing standards and health by noting that “Cold temperatures predominantly affect older age groups, children and those with chronic illnesses ... it is thought that about 40% of cold-related mortality is due to cardiovascular disease and 33% to respiratory disease”¹ Data shows that compared with the rest of Europe, the UK has high rates of excess winter deaths and associated disease exacerbated by the cold. The map below compares deaths from respiratory diseases across Europe. The UK has the highest rates of death in Europe from these types of illness.



From an [article](#) depicting how the UK compares to Europe – Deaths from respiratory diseases

- c) [Respiratory Diseases](#) JSNA Needs Assessment in Hertfordshire states these are very common and a major cause of disability and premature mortality. It is the third leading cause of death in England after circulatory disease and cancer. It is also one of the principal reasons for emergency admission to hospital and as a result, it accounts for a substantial proportion of NHS expenditure.

¹ Public Health England/NHS England, 2017, “The Cold Weather Plan for England: Protecting health and reducing harm from cold weather”, Pg 15

1.2.4 Energy Act 2011

The [Energy Act 2011](#) required that from 2016 reasonable requests by tenants for energy efficiency improvements will not be able to be refused. Furthermore from 2018 it will be unlawful for landlords to rent out properties that do not reach a minimum standard of energy efficiency (Energy Performance Certificate (EPC) rating of an F or a G). In Watford approximately 11,000 (28%) of dwellings are private rented, including 1,600 HMOs. Of these there are an estimated 618 private rented properties having an F/G rating.

1.2.5 Empty homes

The council provides The Ministry of Housing, Communities and Local Government (MHCLG - formerly the Department for Communities and Local Government) annual [data on empty homes](#) within the borough, using information from the council tax database.

The latest information submitted as at 3/10/2017 showed 611 homes classed as empty in the borough of which 48 had been vacant for more than 2 years. The figure for all empty homes represent a low vacancy rate of 1.6% whilst homes vacant for more than 2 years make up only 0.1% of all homes in the borough. The low vacancy rate is due to high housing demand in Watford. The council will regularly monitor homes that are empty for more than two years. It will also undertake research to better understand the reasons why these homes remain empty for long periods as well as determine interventions that may be relevant to bring them back into use. The council will continue to deal with empty homes on an individual basis where they are having a negative impact on the neighbourhood.

1.2.6 Housing Act 2004

[The Housing Act](#) sets out the standards and the regulatory role of local authorities to enforce housing standards. Local authority Environmental Health teams carry out the function of ensuring housing standards are met. Under this policy Watford Borough Council's Environmental Health service will seek to work with landlords and wherever possible adopt an informal approach to encouraging compliance with legislation and ensuring their properties meet the required standards. Where this informal approach fails or there is serious threat to health and safety or imminent risk of harm, then appropriate enforcement action will be sought to achieve compliance in line with Environmental Health and Licensing Compliance Policy.

The Housing Act 2004 also covers HMOs. From April 2006 a new set of definitions for HMOs in England were introduced. The definition is complex and the bullet points below, which are adapted from web pages provided by [the National HMO Network](#), provide a summary:

- An entire house or flat which is let to 3 or more tenants who form 2 or more households and who share a kitchen, bathroom or toilet
- A house which has been converted entirely into bed sits or other non-self-contained accommodation and which is let to 3 or more tenants who form two or more households and who share kitchen, bathroom or toilet facilities

- A converted house which contains one or more flats which are not wholly self-contained (i.e. the flat does not contain within it a kitchen, bathroom and toilet) and which is occupied by 3 or more tenants who form two or more households
- A building which is converted entirely into self-contained flats if the conversion did not meet the standards of the 1991 Building Regulations and more than one-third of the flats are let on short-term tenancies

The Government proposes to extend mandatory licensing to cover all relevant HMOs regardless of the number of storeys ([DCLG Government response document](#)). The requirement for the HMO to be occupied by five or more persons in two or more households will remain.

There are an estimated 1,606 HMOs in Watford, of which approximately 120 come under the mandatory licensing scheme using the current definition. Using the proposed new mandatory licensing scheme definition, a further 133 would be required to be licensed making a total of 253 mandatory license HMOs.

1.2.7 The Housing and Planning Act 2016

In terms of tackling housing standards and management in the private rented sector, the [Housing and Planning Act 2016](#) includes a package of measures to help tackle rogue landlords in the private rented sector. This includes:

- Allowing local authorities to apply for a banning order to prevent a particular landlord/letting agent from continuing to operate where they have committed certain housing offences
- Creating a national database of rogue landlords/letting agents, which will be maintained by local authorities
- Allowing tenants or local authorities to apply for a Rent Repayment Order where a landlord has committed certain offences (for example continuing to operate while subject to a banning order or ignoring an improvement notice). If successful, the tenant (or the authority if the tenant was receiving universal credit) may be repaid up to a maximum of 12 months' rent (now enacted)
- Introducing a new regime giving local authorities an alternative to prosecution for offences committed under the Housing Act 2004, including all HMO offences. Effectively local authorities will have a choice whether to prosecute or impose a civil penalty, with a maximum fine of £30,000. The local authority can also retain the money recovered, which is not currently the case with fines imposed in the magistrates' court. The council has developed separate guidelines to this policy to determine the appropriate level of penalties to impose and when these are appropriate to use as opposed to prosecution (now enacted).

1.2.8 The Smoke and Carbon Monoxide Alarm (England) Regulations 2015

Private rented landlords to have at least one smoke alarm installed on every storey of their properties and a carbon monoxide alarm in any room containing a solid fuel burning

appliance (e.g. a coal fire or a wood burning stove). After that, the landlord must make sure the alarms are in working order at the start of each new tenancy. The requirements are enforced by local authorities who can impose a fine of up to £5,000 where a landlord fails to comply with a remedial notice.

1.2.9 The Welfare Reform and Work Act 2016 and the Welfare Reform Act 2012

[The Welfare Reform and Work Act 2016](#) gained royal assent in March 2016 and had the following key provisions:

- Overall reduction in benefits - a four year freeze on a number of social security benefits.
- Benefit cap reduction - the total amount of benefit which a family on out of work benefits can be entitled to in a year will not exceed £20,000 for couples and lone parents, and £13,400 for single claimants, except in Greater London where the cap is set at £23,000 and £15,410 respectively
- Local Housing Allowance rent cap - this is the locally agreed maximum benefit threshold for a dwelling or household type within a defined geographical area. Therefore, if rises in rent outstrip growth in income, renters may find it increasingly difficult to pay
- A 1% reduction in social rents per year for 4 years to reduce the housing benefit bill

The reduction in benefits may cause hardship for vulnerable households containing young children particularly those living in poor quality private rented homes.

The [Welfare Reform Act 2012](#) (which is in parts amended by the 2016 Act discussed above) impacts on the work of Environmental Health services; in particular the provisions relating to the under occupation of social housing, and the benefit cap. Whilst these provisions will mainly affect tenants in the social rented sector it will undoubtedly have an impact on households in the private rented sector. Those presenting in housing need to a local housing authority like Watford, are increasingly finding themselves offered private rented homes as a settled housing option because of the lack of supply of reasonably affordable housing association homes. Private rented homes offer less security, and in Watford are usually less affordable for persons on low incomes.

1.2.10 Localism Act 2011

The [Localism Act](#) allows social housing providers to offer fixed term for new tenancies, rather than secure lifetime, tenancies. As with the Welfare Reform Act, this has a greater direct impact on the social rented sector, however there is some concern this may lead to greater turnover of tenancies, meaning that some traditional social tenants may find themselves in the private rented sector and potentially become the concern of environmental health services.

Both of these policy changes above may increase the number of vulnerable persons in

private sector properties. If this occurs any properties in this sector in poor condition are likely to have a far greater negative impact on the health of those occupiers.

1.2.11 Energy Efficiency - The Energy Company Obligation (ECO)

[The Energy Company Obligation \(ECO\)](#) is a government energy efficiency scheme to help reduce carbon emissions and tackle fuel poverty. The scheme began in 2013 and over time it has been amended, with the latest changes applied on 1st April 2017. The latest version of the scheme is a transition (ECO2t) before the longer term scheme is developed. The future ECO scheme is planned to run from 2018-2022.

Currently under ECO the larger energy suppliers have set targets to meet two distinct obligations;

1. Carbon Emissions Reduction Obligation (CERO); where obligated suppliers must promote 'primary measures', including roof and wall insulation and connections to district heating systems. Some CERO must also be delivered in rural areas.
2. Home Heating Cost Reduction Obligation (HHCRO); where obligated suppliers must promote measures which improve the ability of low income and vulnerable households to heat their homes. This includes actions that result in heating savings, such as the replacement or repair of a boiler.

Watford has made substantial use of ECO over the years, as well as previous Government energy schemes, subsidies and grants. The previous 5 years has seen nearly £5 million of capital investment taking place in the Watford, with around 1,470 homes benefiting with energy renovations. This has led to residents having warmer homes and cheaper bills. ECO2t gives LA's an opportunity to determine how 10% of the HHCRO funding is spent by publishing a statement of intent (SOI). Watford has been working with Hertfordshire County Council and the 9 other Local Authorities in Herts to have a standard SOI across the region. At the time of this policy energy measures to dwellings, in part using this SOI, are being delivered through the [Herts Warmer Homes](#) project.

1.2.12 The Home Energy Conservation Act (HECA)

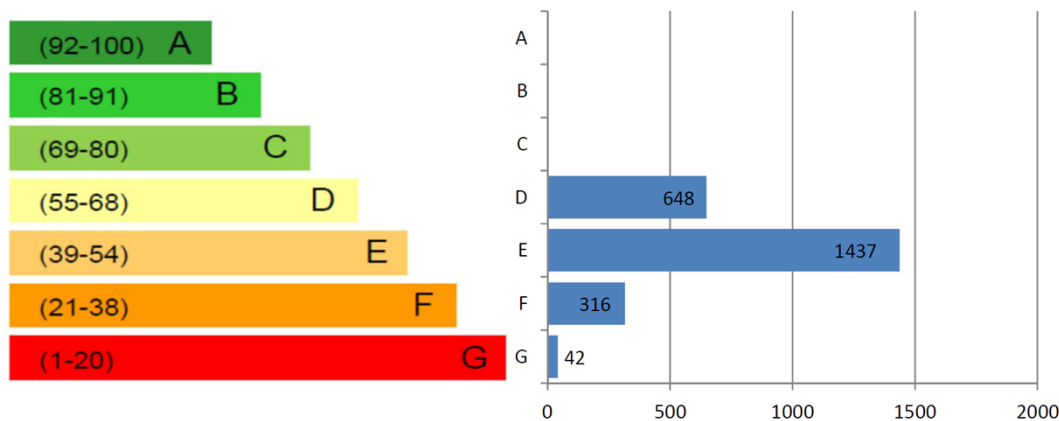
[The Home Energy Conservation Act](#) was updated in 2017. The Act specifically concerns domestic energy efficiency and states 'Local authorities are uniquely placed to assess the needs of their areas and local residents and to act as catalysts for change. The Act recognises 'local authorities' ability to use their position to improve the energy efficiency of all residential accommodation (such as owner-occupied, privately rented and social housing) in their areas.' The Act requires local authorities to report on what is being done to improve energy efficiency in all residential accommodation in their area and to report to the Secretary of State every 2 years on progress in implementing the measures. [Watford's latest report was in 2017](#). Watford has stated that it will continue to access ECO and grant funding opportunities and make use of the benefits of partnership working.

1.2.13 Fuel Poverty Strategy

The Government's fuel poverty strategy, [Cutting the cost of keeping warm](#) is underpinned by the target set out in the [Fuel Poverty \(England\) Regulations 2014](#).

The target is for as many fuel poor homes as reasonably practicable to be upgraded to achieve an energy efficiency standard of band C by 2030, with mid-term targets of band E by 2020 and to band D by 2025.

The graph below shows the number of Watford's households living in properties of an EPC rating of D or below suffering from fuel poverty². Totalling 2,433 households this is equivalent to 6.2% of all homes in Watford.



Typically a fuel poor household's income is around half (about £10,000) to that of an average non fuel poor household (after tax and housing costs). In addition a fuel poor household typically pays 20% more for their annual energy needs (a total of around £1,500 annually) due to living in poorly insulated households.

Statistical analysis also shows that of the fuel poor households around 45% are families with children, 25% are single adults, 21% are couples, with other household compositions making up the remaining 9%.

² The fuel poverty definition used here is low income, high cost with statistics taken from the BRE stock model

Building Research Establishment Modelling

2.0 BRE Modelling

Integrated Dwelling Level Housing Stock Modelling and Quantitative Health Impact Assessment (by the Building research Establishment BRE)

A survey of the housing stock was completed in August 2017 and its findings influence this policy. The BRE have modelled Watford’s housing by using the councils own data, national census information, lodged EPCs, Ordinance Survey, Mosaic (with electoral role information) as well as English House condition survey data. This data is modelled into software to provide the expected attributes of individual properties within Watford. In addition a report detailing the costs and influences the stock condition has in relation to assessing health impact has been completed.

The results of the key indicators are as follows;

Indicator		Private sector stock				Social stock	
		Owner occupied		Private rented			
		No.	%	No.	%	No.	%
No. of dwellings		21,747	-	11,040	-	6,370	-
HHSRS category 1 hazards	All hazards	3,306	15%	1,749	16%	484	8%
	Excess cold	423	2%	337	3%	64	1%
	Fall hazards	2,588	12%	1,267	11%	271	4%
Disrepair		592	3%	527	5%	96	2%
Fuel poverty (10%)		1,535	7%	937	8%	326	5%
Fuel poverty (Low Income High Costs)		1,058	5%	1,151	10%	270	4%
Low income households		1,633	8%	1,490	13%	3,826	60%

The results show a breakdown of hazards (category 1 hazards - that are defined under the [Health and Hazard Safety rating System](#)) as likely to be a serious and immediate risk to a person's health and safety. Consistent with the national picture, the most common hazards are excess cold and that of falls (with over 60% of fall hazards expecting to occur on stairs, 25% on the level with the remainder expected to occur for falls between levels).

The Health & Safety Executive HSE predicted from 2011 figures that 15% of all UK homes have a category 1 hazard. Notably around 1/3 of these hazards occur in households where the occupants are aged 55 or more.

Consultation

3.0 Consultation Analysis

Two surveys were undertaken using e-mail distribution and advertising on the council's web and intranet sites, which led to receiving a total of 177 respondents. An Internal survey of staff returned 26, with a public resident surveys returning 151. The survey gathered data on the existing financial assistance offered as well as seeking views on new assistance determined under this policy. In addition to the wider consultation various officers within different council departments have helped inform this policy.

Further summaries of the questions and results can be found in Appendix G, with a summary below.

3.1 Survey with Watford residents

The survey with Watford residents was conducted in the month of October 2017. The survey contained 25 closed and open questions. Some 151 responses were received. The majority of respondents at 74%, were homeowners. Just 11 respondents had previously used a form of council housing assistance (2 of which were disabled facilities grants, 2 had general advice with a further 7 having used 'Other Council schemes'. Of these other schemes 5 were from an insulation scheme).

Of those that responded to the survey the majority came from the age banding of between 45 and 54. There were few respondents below the age of 34, probably in part due to low ownership rates in this age group. Retired households feature in 40% of the respondents (with just under 30% having a person working in the household).

The responses produced a mixed opinion on how easy the process was for applying for financial assistance and how well the assistance met the expectations. Due to overall small numbers of grant users we cannot determine which assistance was rated well. However it is known that Disabled Facilities Grants (DFGs) can be complex and involve other organisations such as Hertfordshire County Council Adult Care and Children's Services. From a resident point of view this complexity can lead to difficulties, especially for more vulnerable groups. In the past the DFGs have been supported by assistance from an in-house home improvement agency and external surveyors due to these complexities.

84 responses were received when asking about the most pressing housing related concerns for residents. Nearly 30% of these were about getting repairs done or managing the cost of those repairs. However, the vulnerability of respondents was not known. Another 14% found trusted builders an issue, where they had concerns about finding trusted trade persons. Other concerns raised included rent or the cost of housing at 14%. Completing small jobs (perhaps a handyperson service would cover) was at 12% of concerns (with a garden service a further 2%). Parking issues (lack of) was also featured quite strongly at 12%. Energy efficiency (or the cost of heating) was around 9% of respondents concern. Over development of the borough and housing needs followed at 7%.

Having trusted builders, trusted advice and general advice was a theme from most residents who responded when asked 'how could we resolve your housing issues?' There

are already vast amounts of resource with information and advice on where to get repairs or building works done published by various organisations as well as trusted builder web sites. The Council also offers housing defect related advice. Too much choice, though, can be overwhelming for people. Fifty percent of respondents thought the council should continue to offer advice and assistance on housing repair.

When asked what services residents would like to see 'Housing needs' featured strongly (including cost of rents, housing availability and getting on the housing ladder). Again trusted traders also featured.

A number of responses were around the lack of parking as well as regulation to landlords (tenanted properties).

Nearly 90% of respondents thought that the Council should continue with energy efficiency measures to vulnerable homes (just under 4% saying no and nearly 7% undecided).

With regards to what residents thought the council should prioritise or continue to do there were the following notable points; Over 50% supported the council in doing more work around regulation of landlords to improve standards in rented accommodation. Fire safety was of concern (with a possibility that this was influenced by the Grenfell Tower disaster and the dominance this has featured in the media around the time of the survey). Currently Herts Fire and Rescue are conducting free home assessments throughout the borough under the [Safe and Well scheme](#). Other notable concerns were around electrical safety and around 50% supported work around excess cold (and having working heating and hot water).

In the health related questions we asked if people's day-to-day activities were limited because of a health problem or a disability (which has lasted, or is expected to last, at least 12 months). In response around a quarter of respondents said 'yes'. This percentage was similar for those who had a fall in their home. This is important to note as falls constitutes many of the hazards found in a property. Of those who fell 88% had fallen more than once in the last two years.

3.2 The Internal Survey (Council staff)

Of the limited responses there were not many who had used the financial assistance offered by the Council for their clients (residents). Of those that had experience they were mostly in relation to the handyman service.

As well as general disrepair the most common housing defects that officers came across were 'cold, heating and the cost to heat; damp and mould and overcrowding'.

Overgrown gardens at 46% and the external appearance of the property at 38% as well as fire safety at 53% also strongly featured in responses.

Further regulation of landlords was a popular theme for the internal survey, with no desire to offer financial incentives. However, incentives such as a 'star rating' for landlords and

their properties based on their compliance with legal requirements and the standard of their property were also suggested.

Comments on helping to create and offer affordable housing and good quality rental properties also featured.

The current financial assistance is limited in its reach and in its ability to help large numbers of residents. This policy therefore looks to broaden the number of people it helps by using a project based approach. We already know from the current grant assistance and our previous project work that the projects reach many more residents than the direct financial enquires lead to. The assistance we offer to the ad hoc enquires will be very focused on those most vulnerable and be through a professional referral led approach.

Structure, Aim, Framework and Principles of the policy

4.0 Structure of the policy

The Policy is set out to:

- Provide an overall aim
- Provide a framework of principles within which the private sector renewal work will operate
- Identify policy priorities that need to be addressed in Watford
- Identify tools and partnerships that will be used to address these priorities within the principles framework in order to meet the overall aim
- Specify policy objectives and budget allocation with agreed specific, measurable, realistic and focused policies

5.0 Policy Aim

To improve and maintain housing standards to support an accessible private sector housing stock in an environment which promotes health, wellbeing and sustainability, which is targeted to those most in need.

Improvement of housing standards and support may include (but not be limited to) the following headings:

- Removal of category 1 hazards as identified under the [Health & Hazard Safety Rating System](#) to create safer homes and safer housing environments.
- Enabling and encouraging access to home interventions (social prescribing and the linking and referring to voluntary and charitable services).
- Improving to achieve affordable and warm homes (safe, warm housing)
- Improving suitability and accessibility (including regular repairs, adaptations and support to handyperson services)
- Housing Support (enabling people to continue to live independently in their home).

6.0 Policy Framework

The policy takes into account the Council's vision within the current [corporate plan to 2016-2020](#), national government strategies and legislation as well as influences around local housing factors and conditions. Local conditions have recently been ascertained from the BRE stock model exercise completed in 2017, combined with nationally available statistics and information available through our own corporate information.

6.1 The Councils Vision

The vision reflects the current challenges and opportunities facing the Council as an organisation and the town as a place to live, work, visit and study. The Council seeks to champion our town so that it is a place where all communities thrive and prosper, benefiting from strong economic growth and good quality local services and facilities. In delivering the vision the council aims to be both BOLD: working as a team to make things happen; and PROGRESSIVE: Being ambitious, innovative and welcoming.

Supporting this vision, the Council has 5 priority areas of work.

1. Identify ways to manage the borough's housing needs
2. Champion smart growth and economic prosperity
3. Provide for the boroughs vulnerable and disadvantaged communities
4. Deliver a digital Watford to empower the community
5. Secure the councils financial future

This renewal policy update forms part of the [Watford Housing Strategy 2015-2020](#): "Improving the condition and management of housing; Priority 1: To revise the Private Sector Renewal Policy (which includes grant and loan assistance) to make homes decent and adapt them for disabled access."

7.0 Policy Principles and Priorities

7.1 Principles

- **Responsibility:**
The owner is responsible for repair and maintenance and needs to make provision for this. This policy will aim to enable residents to improve their housing through enabling, facilitation and encouragement.
- **Prevention:**
The Council will provide advice, information and facilitation to sustain the housing stock and help owners' prioritize their investment in repairs and improvement. Pro-active work will be used to meet this principle.
- **Targeting:**
By targeting to those clients, areas, properties, sectors and themes most in need the policy works to make use of more effective re-sourcing. Pro-active work will be used to concentrate on particular needs and opportunities (for example where external funding is available or a health priority has been identified).
The policy will be delivered by:
 - A Project Based Approach – to make use of scale of economies and best use of resources. Projects also encourage and lend themselves to additionality achieved through external funding.
 - Working with individuals most in need due to their vulnerabilities. This is to provide a very specific targeted approach through professional referrals and be tailored to individual needs. This is a move away from a reactive service based on set criteria.
- **Partnership:**
The Council will continue to work with partners; to develop and make use of partnership working to optimize resource and bring added value to projects. Partners may be internal departments within the council or external partners (such as Watford Community Housing Trust or Public Health as

examples).

- **Fairness, transparency, consistency and accessibility:**
Council policy and action will aim to be fair, transparent, consistent and accessible.
- **Linkage with strategic aims and objectives:**
Private Sector Housing renewal work aims to reflect national, regional and local priorities and policies; including those detailed within this policy.
- **Wider community benefit:**
The work undertaken aims to impact on the wider community where possible, having a broader impact. Examples maybe where aesthetic housing improvements help to improve wellbeing or where energy efficiency measures reduce fuel bills; helping to increase resident prosperity and reduce poverty.
- **Choice:**
The Council aims to provide choices and create incentives for private sector owners, landlords and occupiers to encourage responsibility and self-empowerment.
- **Prudent use of Council resources (including the recycling of money, cost recovery and income generation for services):**
 - Encouraging homeowners to use own resources first.
 - Provide targeted loans to release equity where vulnerable households are in poor and unhealthy homes.
 - Grant aid will be targeted at vulnerable and low income groups and/or those identified within project areas or criteria.
 - Recycling assistance through charges on property (or works in default where enforcement is used).
 - Charging for enforcement action where the legislation allows.
 - Charging fees to help keep discretionary services within this policy sustainable
 - Covering the cost of HMO licensing through ensuring that the fees charged are at a cost recovery level.
 - Development of assisted housing application policy and resource (for example charging fees for aiding an HMO license application).

7.2 Policy Priorities

- In summary the priorities and reasons for these being chosen are as follows:

Priority	Reason
<p>1. Improve the health and wellbeing of the borough’s residents through housing improvement; with a focus on those most in need (vulnerable households)</p>	<ul style="list-style-type: none"> • Links between housing quality and health • Health and Wellbeing Boards establishment and priorities • Stock modelling shows that 21% of the private sector stock is deemed to be occupied by a low income household (representing 3,123 households; comparing with an additional 3,826 households in the social sector). Distribution is borough wide but pockets of concentration are apparent throughout different areas of the borough • Supporting the principles within the Councils’ vision and priorities
<p>2. Improve the Energy Efficiency of the Borough’s housing</p>	<ul style="list-style-type: none"> • Government targets exist with supported financial support (such as ECO) which provides additional external investment in the borough – therefore proving good added value for any resource allocated • After the combined falls hazards, excess cold by far has the ability to save the NHS and Society the most. (Within Watford mitigating excess cold cases would provide combined savings of £2,403,613 (comparing to the next highest hazard mitigation of crowding & space at £529,448). Improving Energy Efficiency will reduce this hazard. • Over 2,200 private sector households are deemed to be in fuel poverty in the borough and energy efficiency measures alleviate this. • This work area lends well to partner working as it has an established prior track record of government supported projects, contractors and managing agents combined with the available subsidies mentioned above. • Home Energy Conservation Act 1995 requires local authorities to reduce energy consumption within its boundaries • 66% of Watford’s private sector properties have an Energy Performance Certificate Rating (EPC) of D or below (on the scale of A to G where A is the best). • England has one of the highest excess winter death rates in Northern Europe with EWD contributing to 1 in 20 of all deaths per year.

Priority	Reason
3. Enforcement of housing standards in the Rented Sector	<ul style="list-style-type: none"> • Large increase in the private rented sector rapidly growing over the last 15 years in Watford • Rented sector accounts for 44% of the housing stock • Higher proportions of vulnerable residents in the rented sector (In Watford low income households live in 60% of the social stock, 13% of the private rented and 8% of the owner occupied homes). • Create and maintain a level playing field in this sector. • Ensure tenants are safe and protected and live in
4. Provision of Disabled Facilities Grants (and a supported service to deliver them)	<ul style="list-style-type: none"> • Mandatory requirement to consider DFG applications • National and Regional focus on improving home facilities for disabled people and to reduce the length of time they wait for these adaptations • Links with supporting people agenda • To prevent falls and ensure that residents are able to live safely and independently in their own homes.

8.0 Discussion and Reasons for Choosing These Priorities & Principles

In 2004 Watford comprised of an estimated 39,157 (an increase of 10,000 dwellings since the last policy was written back in 2004). This policy therefore has an influence on a very large section of Watford Borough's residents and visitors.

Setting the principles and priorities has needed to incorporate a wide remit of factors. The policy has been aligned with the Councils' own policies and priorities as well as influences by legislation and the information obtained by our recent stock model and health impact assessment surveys.

The influential legislation in determining the contents of this policy are:

- New legislation around Energy Efficiency and the influences to wellbeing it has through: The Home Energy Conservation Act (updated in 2017), Fuel poverty targets (Cutting the cost of keeping warm 2015), changes to the Energy Company Obligation (ECO 2t from April 2017).
- In conjunction with the large increase in the rented sector in Watford, the national legislation affecting this sector: The Housing Act 2014 and Housing and Planning Act 2016, The Localism Act 2011, The Welfare Reform and Work Act 2016, The Housing and Planning Act 2016.
- Health influences; the detrimental effects to health poor housing leads to as well as cost implications to society and the NHS – demonstrated by Watford's recent Health Impact Assessment.

- **Evidence including the stock model survey**

With the move to digitalization and the increase in available data the Council has been able to compile comprehensive data and modelling around the condition of its housing stock. This has provided the council with an accurate picture of house conditions as well as social and economic factors (such as crime and health statistics and demographic trends), pulled together from a number of sources. A summary of this information is available from the Environmental Health Service upon request.

- **Consultation**

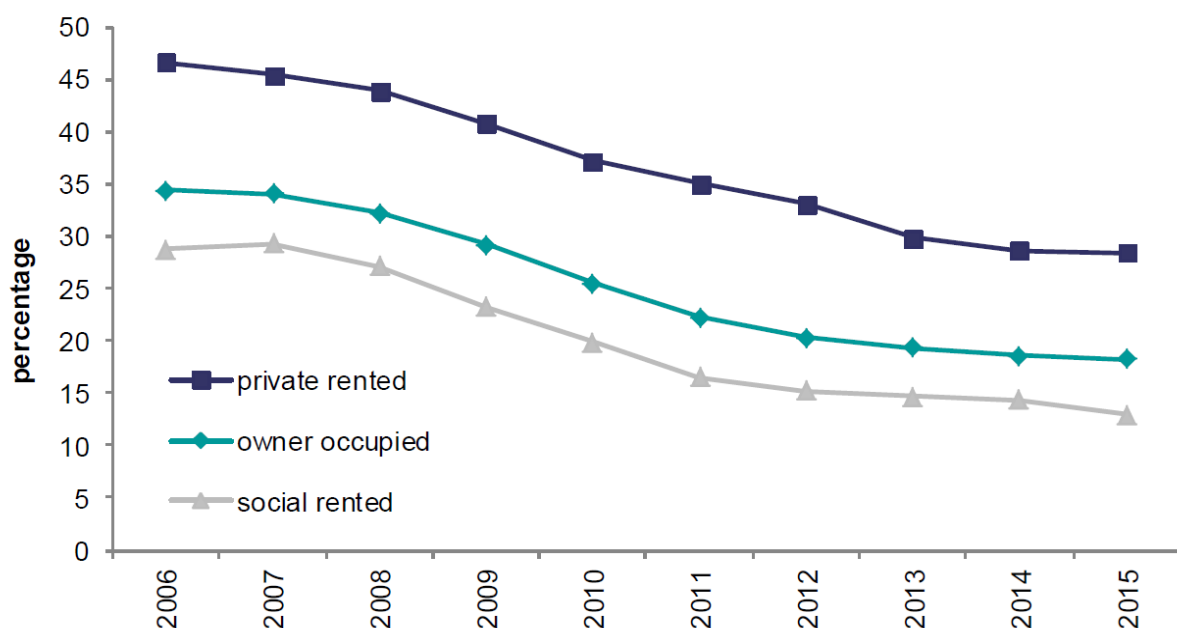
The consultation exercise has helped inform the policy update having consulted a wide range of Watford’s residents as well as internal officers, staff, decision makers and Councilors.

- **Strategic context**

The Regulatory Reform Order (RRO) on Housing Renewal which came into force on 18 July 2002 and gave Local Authorities a general power to introduce policies for assisting individuals with renewals, repairs and adaptations in their homes through grants or loans. As such the first Council policy was adopted in 2003.

The RRO provided detailed advice on how a private sector housing renewal policy should be developed as an integral part of the authority’s overall housing strategy. The Government expects Private Housing Renewal policies to link with national, regional and local strategies including the Councils priorities. The following are the main strategic priorities that have influenced policy development.

At the time, as part of the 2002 Spending Review, the Public Service Agreement 7 (PSA) target to make all homes in the social sector decent by 2010 was extended to include private sector homes. The old policy was therefore influenced by this target. However significant progress continues to be made towards this Decent Homes target, as depicted by the chart below.



Non Decent Homes by Tenure in England (2006-2015) from [English Housing Survey](#)

The Decent Homes Standard has four elements. For a property to be decent it should have no category 1 Housing, Health and Safety Rating System (HHSRS) hazards, be in a reasonable state of repair, have reasonably modern facilities and have a reasonable degree of thermal comfort.

This policy moves away from focusing on the decent homes standard for a number of reasons. From the previous graph it can be seen that nationally there is a decline in the numbers of non-decent properties. In Watford the disrepair statistics gathered from our stock model show 3% of Watford's housing stock (1,215 properties) were found to be in disrepair (with the definition used for disrepair aligned with the definition used in the Decent Homes Standard). The English Average is at 5%. By combining data with private sector housing and low income households this reduces to just 184 properties. Often the disrepair element of the decent homes standard can be mitigated by removing one of the HHSRS hazards.

Therefore the policy is more focused on vulnerable residents and elements of the housing that relate to health and those that have the biggest impact. These are addressed through HHSRS. This is to ensure the resources are more focused into delivering benefits that offer best value for money. As the previous example notes; there is a strong evidence base that shows the most significant HHSRS issues relate to cold homes and falls. After the combined fall hazards, action to mitigate excess cold has by far the most ability to save NHS resources make the largest contribution to savings to society.

National priorities

Nationally the private rented sector is an important and growing part of the housing market, with 3.8 million households in England. The quality of privately rented housing has improved rapidly over the past decade. In relation to this agenda the government conducted a [Review of Property Conditions in the Private Rented Sector](#) and in February 2014 the Government published the results of a consultation exercise in reviewing conditions. The report acknowledges that, while most landlords are reputable and provide decent and well maintained homes, a small proportion of landlords neglect their properties and do not provide a good service to their tenants. These landlords, together with lettings agents who provide a poor quality service, should be the focus of policy action. Proposals included:-

- Making tenants aware of their rights through a Tenants' Charter
- Providing and publicising information on local authority websites.
- Imposing a statutory duty on local authorities to investigate and deal with housing complaints, and not closing the case when the tenant leaves the property; the case will remain open until the property is fixed generally. This could assist in reducing retaliatory evictions as there is no benefit to the landlord in evicting the tenants.
- Information sharing between local authorities on so-called "rouge landlords."
- Providing tenants with a holistic approach to handle issues including financial advice, housing advice, mediation with landlords and referrals to other agencies.

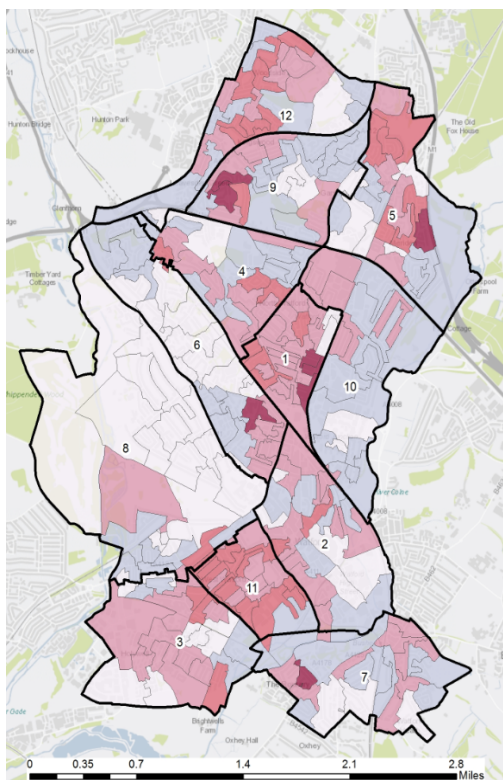
Local priorities

This document is a policy update as set out in the [Watford Borough Councils Housing Strategy 2015-2020](#) (under improving the condition and management of housing) - one of the strategy priorities is to revise the Private Sector Renewal Policy.

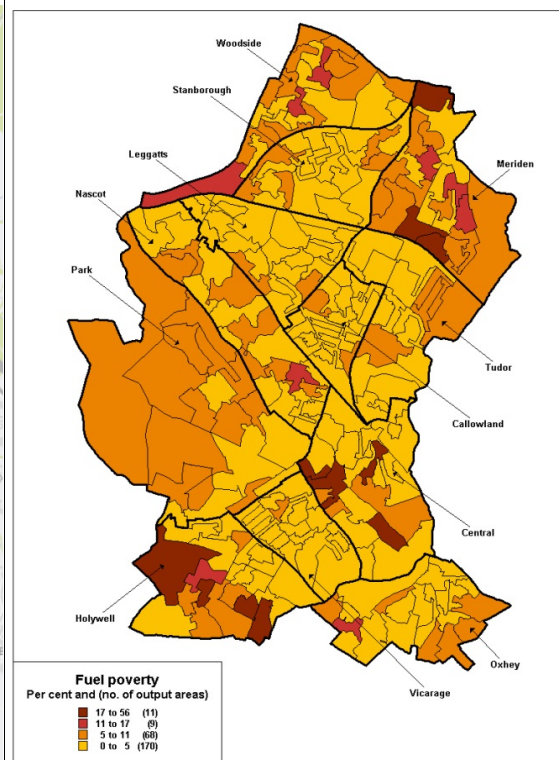
The vision of the strategy states that it aims to improve the well-being of local people by making Watford a better place to live, with sustainable and healthy homes, and a balanced, vibrant community.

As previously stated there has been a significant increase in the private rented sector in Watford. The Council recognizes that this is an important sector as part of the housing supply within the borough. Watford is a busy vibrant town with good links to London and the Home Counties. Therefore it is an important commuter town and hub within the region. The private rented sector is helping to support housing demand within the borough. In support of a well-managed private rented sector the council wishes to promote good standards and regulation.

The BRE Stock Model 2017 has helped inform and influence this policy. Since the last stock condition survey in 2009 Watford's housing conditions have become less polarized in that patterns of housing condition indicators have become more spread across the Borough. More accurate representation of data has also influenced these patterns. As an example the maps below plot concentrations of fuel poverty from the 2017 survey and the 2009 survey.



2017 – Fuel Poverty (LIHC)

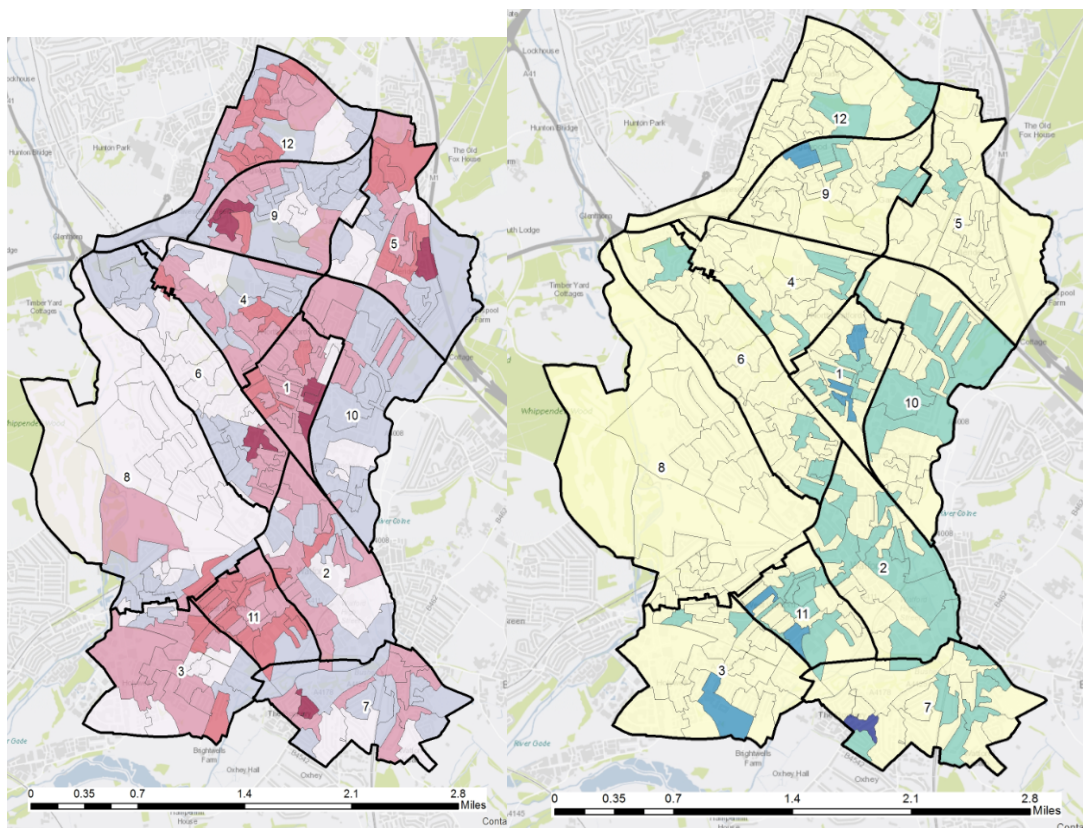


2009 – Fuel Poverty (10% rule³)

³ Where a household that needs to spend more than 10% of its income on fuel to heat to an adequate standard

As well as generalised information showing concentrations of housing related conditions the new stock model has the ability to model each household individually. Therefore this policy moves away from targeting specific wards but instead makes the assistance available borough wide and project dependent. The Council now has more information and ability to specifically target projects based on housing characteristics and need, relevant to each target audience of any project.

This example is further demonstrated by comparing two maps from the 2017 survey; the first map shows concentrations of fuel poverty in the Borough whilst the second map shows a combination of properties with excess cold and low income households. This ability to combine data sets to provide more detailed information enables better focusing and targeting of available resources for housing improvement in the borough. As a result, the policy therefore moves away from Ward prioritisation but instead can be targeted more specifically towards the chosen need(s).



A further example is demonstrated by the next map extract which shows concentrations of the governments new licensing for HMOs. The ward boundary line between 11 (Vicarage) and 2 (Central) lies on Cassio Road. It can be seen that the shaded areas depicting the concentrations can be different depending on which side of the road properties fall as well as areas of indicated concentrations crossing ward boundaries. This gives us more detailed knowledge of chosen target data as opposed to generalizing properties into ward areas.



Generalisation of wards by averages is inaccurate for targeting purposes as the data we now have is at household level (such as the different concentrations depicted by the dark colours in Vicarge that cross ward boundaries). Ward averages would in some instances water down concentrations of need.

Previous surveys have often used housing ages and averages to determine housing conditions. The BRE Stock Condition data we now have means we are better able to accurately assess local housing conditions. Distributions of detrimental housing conditions have also had more rapid influences over recent years. In the past the age of a property was often linked to housing conditions; with averages showing that older properties are in worse repair than newer ones. However this is not always the case and other factors can make it a more complex issue. Greater generalisation and even distribution of the housing indicators across the borough are attributable to some of the following factors; Watford being a commuter town, whereby a high income city worker can be living next to a vulnerable older person, but both be living in a similar age property in differing states of repair. This is also influenced by the high house prices in Watford, meaning high income earners buying in traditionally poorer areas of the borough in poorer condition housing against a backdrop of long term homeowners having built significant amounts of property equity far greater than earnings potential has risen. The rapid change of tenure to more rented properties is serving a housing need matching this affordability. The concentrations of this demand are highly focused on town center (and train commuter routes). The rented sector is now providing accommodation for low paid key workers as well as young and well educated city dwellers.

Policy Delivery

9.0 Targeting resources to achieve policy priorities

It would be unrealistic to tackle all of the housing issues in Watford. From the BRE data the cost to remove all of 6,670 main HHSRS hazards in Watford's private sector stock assessed at £11,646,674. However, the costs to society and to the NHS⁴ of not mitigating these hazards is assessed at £11,233,427 annually (£9,998,917 plus £1,234,510 respectively). This shows that removing hazards has positive financial effects in the relatively near term, with pay back periods approaching just 1 year.

With limited resources for delivery it is more effective to concentrate on those hazards that have the potential to make the biggest savings. In addition this policy has a particular focus on vulnerable groups which aligns with one of the council 5 corporate priorities which is to provide for the borough's vulnerable and disadvantaged communities).

The definition and focus of vulnerable for the purposes of this policy will be the [affordable warmth group](#) from the energy company obligation. In addition the council includes those in receipt of [Housing Benefit](#) and benefitting from the [Watford Borough Council Tax Reduction scheme](#) in the definition of vulnerable. This is because these groups are more susceptible to health impacts associated with poorer housing conditions and have less ability to rectify these defects, due to lack of income. As part of this consideration the two most common housing related defects are falls and excess cold which both relate to some of the vulnerable groups within the affordable warmth criteria – which is also affected by income. (However, it should be noted that the borough only has a small number of residents that would qualify under this criteria, as they would need to live in the private rented sector).

It is proposed that the definition of vulnerability set out above will stay aligned with any changes to the criteria for the Affordable Warmth group, Housing Benefit and Watford's Council Tax Reduction Scheme definition, subject to those changes still delivering the principles and aims of this policy. Where any changes to definition of vulnerable made by government or by the council are deemed minor, the policy would be changed via delegated authority. If there is a fundamental change in the definition of vulnerability, then formal consultation will be undertaken.

In addition to offering assistance the council will seek to:

- Encourage homeowners and landlords to maintain and invest in their own property, thus protecting their asset (and its value) in the longer term.
- Target and recycle limited public funds at the most vulnerable households living in the worst housing conditions by providing a framework of support based on enforcement and interest free loans.

⁴ As well as the estimated savings to the NHS (health care costs), savings to society includes increased spending on benefits, loss of future earnings and demands on other services. It is also estimated that 105 [Quality Adjusted Life Years](#) (QALYs) could be saved if all serious housing hazards were mitigated.

- Utilise partnership working to lever in further funds for improvement works to increase project capabilities and improve service delivery. For example ECO monies , health monies and/or other grant funding.
- Continue to collect and use evidence, data and intelligence about the borough to target funding and enforcement, including information to inform the equalities agenda and the equalities impact assessment for this policy.
- Addressing small works at an early stage to prevent deterioration of properties in the future and to improve home safety and health.
- Proactively approaching priority households to publicise the service and inviting applications for assistance and to assess the need for enforcement. For example the [Street Improvement Project](#).

Proactively approaching priority households to assess the need for enforcement. For example by doing pro-active work in areas with high numbers of poor quality rented accommodation.

- Proactively targeting properties, areas and owners where accommodation presents the highest risk to health and safety of occupants and the most negative impact on local communities. For example area or ward action, rented properties, HMOs, etc.
- Focus resources on tackling issues of corporate importance and move to a targeted approach based on annual plans contained within the Environmental Health & Licensing Service Plan and Housing Service policies.
- Although some place must be given to a reactive service, we aim for 70% of resources to be allocated as a result of proactive prioritisation, planned visits and programs.

10.0 Tools to achieve the Policy

The tools that will be used fall into 4 categories:

- Promoting and Enabling
- Direct Assistance
- Disabled Facilities Grants (mandatory direct financial assistance)
- Enforcement

10.1 Promoting and Enabling

Work in this category includes, but is not limited to:

- Provision of advice and assistance in the form of web based information, leaflets and verbal advice to all Watford residents and property owners. Where appropriate the provision of written advice to vulnerable households and working with landlords to achieve compliance with standards in rental properties. The assistance offered will be appropriate for the circumstances of the individual concerned and the property condition and includes advice on:

- property repair
- Property maintenance
- Property condition
- How to get work carried out successfully to your home
- how to prioritise repairs
- any available discounts and schemes they may benefit from
- How to choose a builder such as [Which trusted traders](#) (currently supporting through the Hertfordshire County Council schemes)
- small building works
- Compliance with legislation

The council will also assist by making referrals to other agencies and schemes that may be able to assist or that the person may be eligible for.

- Provision of ‘care and repair’ type services for identified vulnerable households, who because of their age or infirmities are not able to manage the process of completing works to their property. The current intention is that this will be provided through the [Hertfordshire Home Improvement Agency](#) as well as the ability in some cases to include the cost of an external support service within any financial assistance award.
- Support and promotion of energy efficiency and renewable energy technology schemes and developments at a local and regional level that support the aim and priorities of this policy (for example the [Herts Warmer Homes scheme](#)).
- Facilitation of referrals to any supported and approved handyman schemes (for the completion of minor jobs that effect vulnerable peoples’ safety and use of their home), such as [AgeUK Dacorum Handyman Service](#). This work stream is to be developed in the future to allow for potential assisted handyman provision. This may include limited funding to be provided to individuals; to be developed through a Project Grant.
- Other work that may support the delivery of the policy and its tools including obtaining reports, valuations and specialist advice as necessary for progressing cases.
- Possible funding to other projects and forming partnerships to achieve the policies’ aim and priorities.
- Self-certification scheme(s) for landlords.
- Training courses for landlords.
- Landlord’s forum, newsletters and focus groups.
- Joint working with organisations such as Herts Young Homeless Group, New Hope and Social Services to make sure that vulnerable people are placed in safe accommodation.

A person may (amongst other routes) access the assistance and services in this category offered by:

- Contacting Environmental Health direct (or via the Customer Services Centre).
- By being referred to the service by another agency or internal service area.
- Be brought to the attention of Environmental Health as the result of a complaint
- By proactive contact by Environmental Health.

10.2 Direct Assistance Offered Through the Policy

10.2.1 Discretionary Assistance

The basis for all of the discretionary assistance is to remove or reduce housing related defects that are detrimental to an occupant’s health, both in terms of their physical and mental wellbeing.

This can include housing related defects as indicated and assessed under the [Health & Hazard Safety Rating System](#) (HHSRS) produced by Department for Communities and Local Government (DCLG).

The table below summarises the direct discretionary assistance offered through the policy, with all assistance available to the private sector.

Assistance	Qualification	Finance Offer	For
Safer Homes Grant	<ul style="list-style-type: none"> Referral by a health or housing professional (not open to general resident applications) Be eligible to qualify under the governments vulnerable definition as indicated by the affordable warmth group with the addition of Housing Benefit and Watford’s Council tax reduction OR in exceptional circumstances for consideration of the grants panel and whereby a loan is not appropriate (and the applicant is deemed as vulnerable or susceptible to a health condition and there is a housing related defect that that could lead to a class 1 or 2 harm outcome due to age or infirmity as defined under HHSRS guidance 	Up to £1,000 Grant	<ul style="list-style-type: none"> Removal of HHSRS Hazards Prevention of Category 1 HHSRS Hazards Work that leads to the enabling of HHSRS hazard mitigation Housing defect rectification that alleviates an individual’s state of physical, mental and social well-being As an incentive tool to encourage take up of other assistance such as a Safer Homes Loan or to engage vulnerable residents to work with other external agencies and services
Safer Homes Loan	<ul style="list-style-type: none"> Referral by a health or housing professional (not 	Up to £10,000	<ul style="list-style-type: none"> Removal of HHSRS Hazards Prevention of Category 1

	<p>open to general open applications)</p> <ul style="list-style-type: none"> • Be part of the governments vulnerable definition as indicated by the affordable warmth group with the addition of Housing Benefit and Watford's Council tax reduction 	loan	<p>HHSRS hazards</p> <ul style="list-style-type: none"> • Work that leads to the enabling of HHSRS hazard mitigation • Housing defect rectification that alleviates an individual's state of physical, mental and social well-being
Project Loan or grant	<p>Determined by the scope of the project; (prior set and published) limited to housing related defects or improvements and include the following:</p> <ul style="list-style-type: none"> • Geographically set dependent upon the project target outcomes • Have consideration to and have set criteria around an appropriate level of the applicant or tenants income • Be match funded supplementary to other sources of funding • Only be available within the private housing sector 	Up to £5,000 Loan or grant	<ul style="list-style-type: none"> • To top up or provide supplementary funding where other sources of funding have been used first • To enable property improvements where the housing condition is detrimental to the occupants health and wellbeing
Trusted Advice	All Residents	Advice	<p>Help with trusted builder schemes and housing advice / support with applications. General advice on building works</p>

10.2.2 Safer Homes Grant (SHG)

This is a grant that enables removal or prevention of category 1 hazards as depicted and rated under the [Health & Hazard Safety Rating System](#) (HHSRS) as well as easing and preventing other hazards within a home that affect the persons wellbeing (both physically and mentally) caused by a defective housing condition. A category 2 hazard maybe considered to be included where this is likely to result in a category 1 hazard within 5 years if it were not addressed.

As well as those under HHSRS an example of a health related hazard that is detrimental to a person's mental wellbeing could be hoarding; leading to potential issues of unhygienic conditions (hoarding making cleaning very difficult), as well as encouraging rodent or insect infestations, increasing the likelihood of trips and falls, be a fire risk and potentially blocking exits. In assessing hoarding it is proposed to use the Hertfordshire Hoarding Protocol (currently about to be finalised). The grant maybe used to address Level 2 hoarding issues as detailed in the protocol but only where there is a risk to children or adults at risk of abuse or neglect. The grant may also be used to address any level 3 hoarding (in both cases where the applicant meets the other grant criteria).

As well as alleviation of a hazard this grant is also given to prevent future hazards occurring. For example works maybe included to secure the basic fabric of the property from the entry of wind or rain; where if left a future HHSRS hazard may occur. An example would be a leaking roof which if left unattended would lead to a category 1 hazard for damp and mould growth.

A SHG may be used as an incentive tool to encourage other assistance such as a Safer Homes Loan or to engage vulnerable residents to work with other external agencies and services on the principle that the work is to remove or reduce housing related defects that are detrimental to an occupant's health, both in terms of their physical and mental wellbeing.

The grant limit is up to £1,000. It is only accessed through a professional referral such as a social worker, health worker, occupational therapist, county or local authority officer (or those employed on their behalf. The referral should:

- Justify the need
- Set out the client's vulnerability
- Demonstrate a clear link between a housing defect and the occupants' health and wellbeing
- And/or demonstrate that the grant will contribute to future works or enable other funding to be leveraged to solve a resident's housing related issue affecting their health

The SHG is an entry level assistance grant aimed at quick resolutions or to prime/instigate other forms of funding, assistance and aid. An example could be where an emergency boiler repair takes place before more extensive works in the form of a Safer Homes Loan (SHL).

In terms of qualification the owner (or private rented tenant with repairing responsibilities) must be in receipt of (or be eligible to receive) a qualifying benefit at the time of full application from the governments [Affordable Warmth Group](#), or be in receipt of Housing Benefit or be in receipt of Watford Council Tax Reduction. The assistance is not open to other applicants such as those in the social rented sector.

In exceptional circumstances (for consideration of the grants panel – see 12.1) and whereby a loan is not appropriate (and the applicant is deemed as vulnerable or susceptible to a health condition and have a housing related defect that that could lead to a class 1 or 2 harm outcome due to age or infirmity as defined under HHSRS guidance) a Safer Homes Grant maybe considered.

The SHG should not be used where works are expected to take place under a Safer Homes Loan; where there is not a need for emergency works due to an immediate risk of a class 1 or 2 health outcome (from the HHSRS guidance from the 4 classes of harm).

Examples (but not limited to) of a SHG are indicated below:

- Repair of steps and handrails to remove the risk of falls.
- Part clearance of a hoarded property to remove fire and fall hazards and alleviate mental health distress or to allow other works to take place.
- A report to assess an HHSRS hazard such as a structural report to assess structural collapse.
- Garden clearance to enable access for subsequent HHSRS remedial works or for the purposes of improvement of a person’s mental and social well-being or as part of the hoarding protocol as before described.
- Top up funding to supplement a boiler replacement/installation (removing a category 1 hazard).
- A repair to a heating system (thereby removing a Cat 1 hazard).

Full conditions are set out in appendix A and B which include a qualifying checklist for this form of assistance.

10.2.3 Safer Homes loan (SHL)

The SHL is for the same works as the Safer Homes Grant but comes in the form of a loan. It is for qualifying works up to the value of £10,000 which is placed as an interest free charge on the property, in the form of a local land charge, until the property changes hands or is sold.

The SHL is only open to private sector homeowners and tenants with repairing responsibilities who are in receipt of Housing Benefit, Watford’s Council tax reduction or are part of the government’s vulnerable definition as indicated by the [affordable warmth group](#).

Applications must be made by a referral by a health or housing professional, The principle of fee charging also applies to this loan – see fees and charges in section 11.0.

An application for a SHL will not normally be considered if any type of financial assistance was granted under the previous 2006 Private Sector Housing Renewal Policy (with the exception of DFGs or handyperson) within the last 7 years, except in extenuating circumstances.

Where there are extenuating circumstances and not all the works necessary can be done under a single application then additional applications can be made. Examples where additional SHL applications may be needed include where it is due to a person's age or infirmity or because of other practical reasons agreed by the Council. Additional applications may be made up to a maximum of £10,000 over a 5 year period if eligibility criteria are still met. After the maximum is met, the owner or any other occupant of the dwelling may not re-apply for a SHL (or SHG) assistance for 7 years unless there is a change of ownership.

Applicants who do not qualify for these forms of assistance will still receive advice.

For full details of eligibility criteria and conditions see Appendix A and D which include a qualifying checklist for this form of assistance.

10.2.4 Project Loan or Grant (PL or PG)

All loans and grants will seek to improve housing conditions or improvements in housing related works that lead to a health improvement for the occupant. The principle of the loan or grant is to provide gap funding whereby the value offered does not exceed the capital expenditure of other supplementary funding (such as other grant funding or resident contributions). The loan or grant is subject to the availability of discretionary monies from the council and also health services or other government related schemes such as ECO funds which provide match funding.

The loan or grant will have set criteria dependent on the project it is linked to. Specific details of each available project loan or grant will be published online (and will be available in print on request). The projects will follow considerations made through the Project template (check list) in appendix D

Criteria will be set and approved by the Head of Environmental Health & Licensing in consultation with the Portfolio Holder and be aligned with the council's current corporate objectives and priorities.

Projects should encourage recycling of funds: a loan is preferred over a grant unless it is considered this would be too detrimental to the project, anticipated uptake would be adversely affected or of too small value to be a loan.

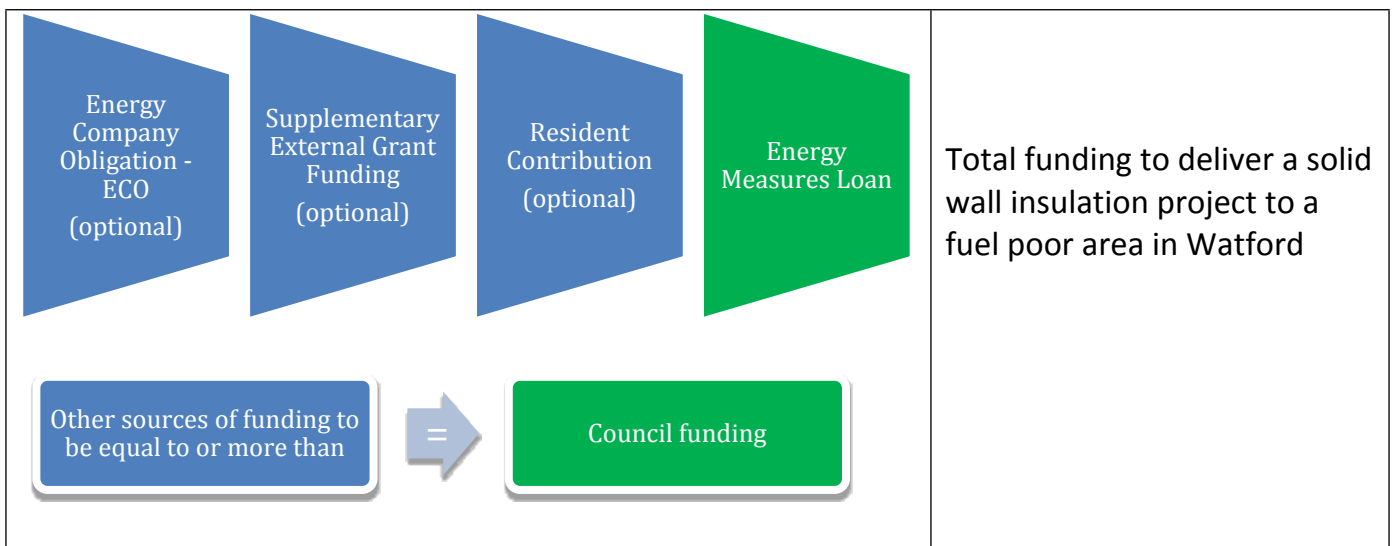
Any loan is added as a local land charge to a property and is interest free.

A SHL or SHG MAY also be subject to some of the following additional criteria, which are set by the terms of each project:

- Be means tested or available for 'able to pay' residents
- Made available for energy efficient measures and technologies such as insulation, heating appliances or renewable technologies.
- Have set geographical areas defined by a project.
- Be subject to completion of supplementary works – for example loft insulation may be required in conjunction with a loan for solid wall insulation.
- Be available for the private sector (owner occupiers, private rented tenant or private rented sector landlords as the project dictates).
- Not to be used when alternative financial grants or assistance outside of the organisation is practically viable and readily available.
- Provide match funded to ECO, grant and resident funding to enable high cost energy efficiency improvements such as external wall insulation.
- Targeted project to encourage improvements to the housing quality of private rented sector properties.

Below are three examples of Project Loans/Grants:-

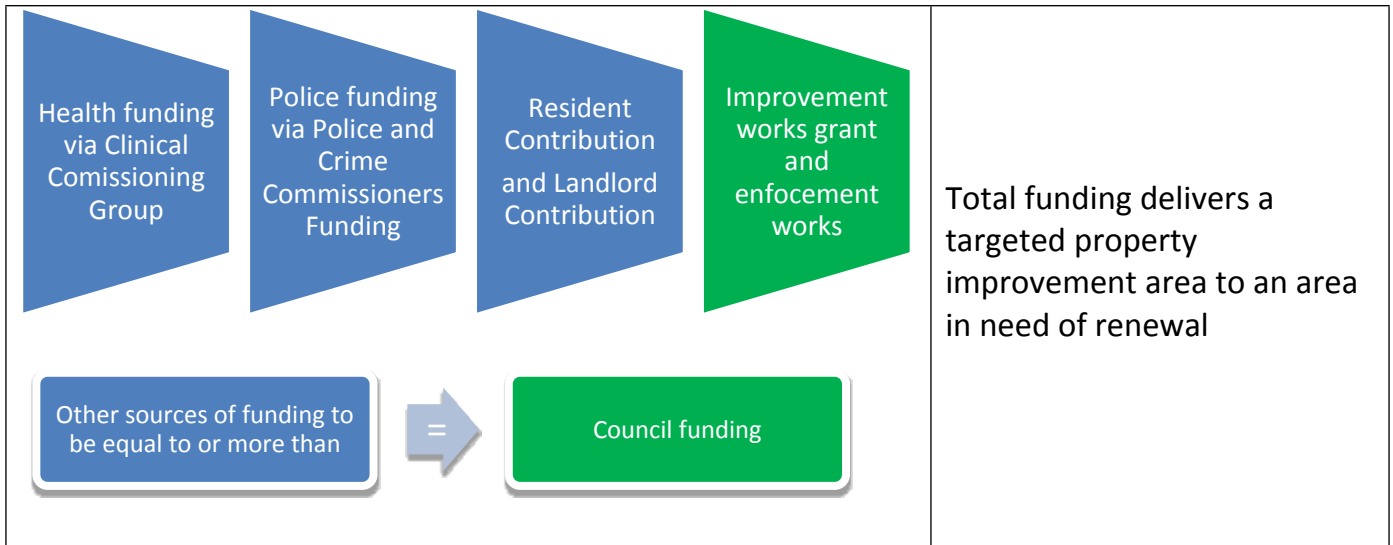
- a) An Energy Measures Project Loan** set up to support an energy scheme that the Council is going to participate in. The loan is designed to support shortfalls in other supporting funding and should always be used once all other available funding has been applied.



b) A Street Improvement Project Grant

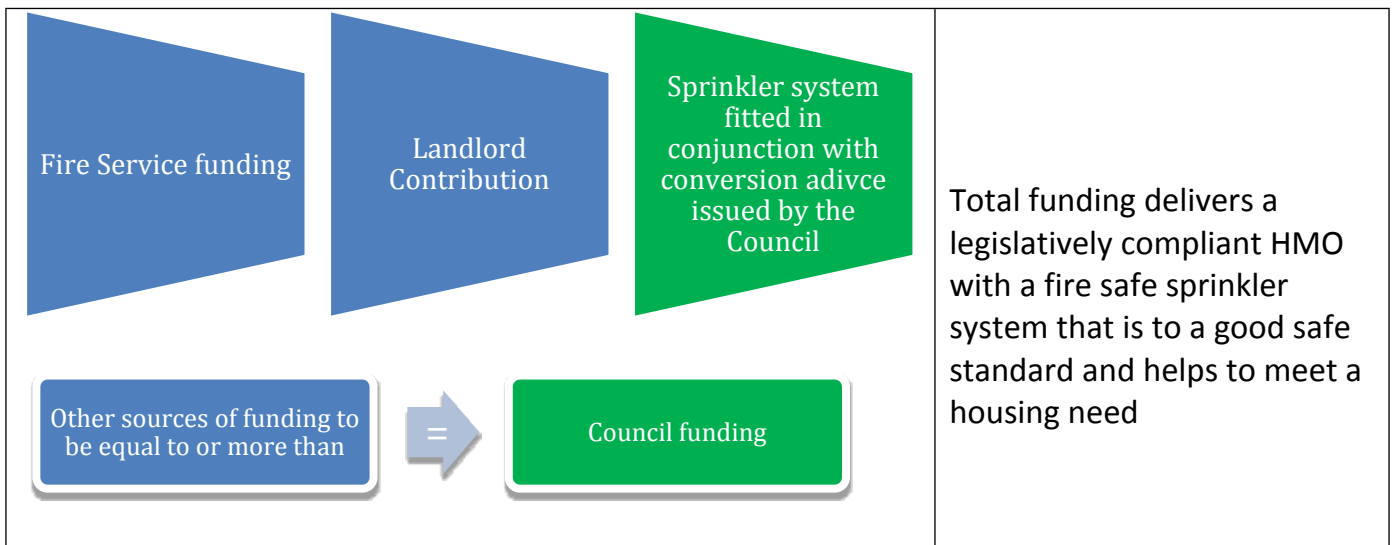
A grant given to homeowners and landlords to improve the external condition of housing in a defined project area; with the aim of improving all aspects of the home and the wellbeing of residents. The project seed funding and resource encourages external partner funding. The project work is carried out in conjunction with owners to complete necessary regulatory requirements without the need for enforcement where appropriate due to encouragement and participation. The

project improves the housing standard and reduces the probability of a detrimental health outcome to residents.



c) A House in Multiple Occupation Improvement Project (sprinkler systems)

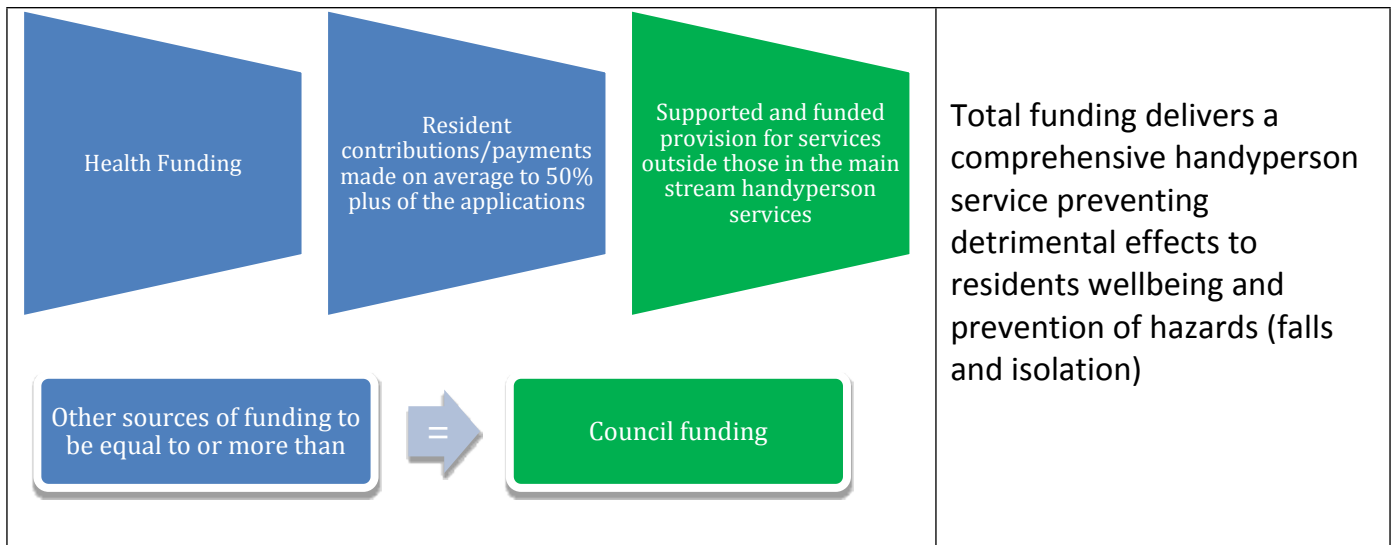
An incentive project to encourage sprinkler systems to be fitted to HMOs as there is a greater risk of fatality in the event of a fire. The project improves the housing standard, reduces the probability of a detrimental health outcome and helps to address the housing demand.



d) Development of a supported handyperson service

The principles of this specific service are further described under the promotion and enabling section – see 10.1. A small grant supported handyperson service to cover work deemed appropriate to vulnerable individual's houses; to facilitate other works to take place or remove HHSRS hazards. In the first instance referrals are made to other agencies under this grant policy. Residents are asked for contributions/full payment towards this service. Where works are outside of the skill set and remit of the external agency, but are still required and meet the policy principles then in house funded referrals may take place. For instance, fitting of a

telecoms point so that another agency can fit a lifeline (in this case match funding in value is achieved through the client contribution and payment for the lifeline).



10.3 Trusted Advice

From the current proposals the trusted advice comes in the form of referral to web based information such as [Which trusted traders](#) (currently supported through Hertfordshire County Council Trading Standard schemes) and support via the [Hertfordshire Home Improvement Agency \(HIA\)](#). (The newly set up HIA will aim to develop schemes that use trusted builders).

10.4 Mandatory Assistance

10.4.1 Disabled Facilities Grants (DFG's – Mandatory Direct Financial Assistance)

[Disabled Facilities Grants](#) (DFGs) enable adaptations to be made someone's home so that they can continue living independently. Examples of works undertaken with DFGs include:

- Widening doors
- Installing ramps
- Improving access to rooms and facilities – e.g. installing stair lifts
- Providing access to the garden
- Providing a downstairs bathroom or wet room
- Providing a heating system suitable for an applicant's needs
- Adapting heating or lighting controls to make them easier for applicants to use

The grants are available nationally with criteria set outside of this policy. They are subject to conditions and eligibility (which includes a test of resources, except in case where eligible works are for a child or young person under the age of 19 where no means test is required).

On 7 November 2016 Watford Borough Council's Cabinet agreed to transfer its DFG service to the Housing Improvement (HIA) Service for Hertfordshire. The reason for transferring DFG work to the countywide HIA service was firstly, that costs, error and inconsistency in dealing with DFG applications across the county would be reduced and secondly, that communication about DFGs and allied services could be improved so that applicants could access them more easily. The key deliverables of the shared Home Improvement Service are set out below:

- Ensure that all individuals in Hertfordshire who need housing adaptations to support independent living will have access to an appropriate service that is timely, accessible, equitable and fit for purpose to address rising demographic pressures.
- Deliver a fully standardised service, enhancing operational efficiency, customer satisfaction and improving value for money.
- Implement robust monitoring arrangements against key performance indicators.
- Improve service resilience through joined up working, adopting a common methodology and service standards, sharing staff knowledge, skills and expertise.
- Open up future opportunities to expand into private sector adaptations and align to wider Clinical Commissioning Group activity in order to maximize income generation, efficiency and value and impact of the DFG element of the Better Care Fund.

Further information about applying for DFGs can be obtained from the [HIA](#) website or by calling them on 01438 843467 or 01438 843948.

10.4 Enforcement

10.4.1 Owner Occupiers

Where the owner has not taken action to remedy a category 1 hazard (or made use of any assistance offered) enforcement will be considered. This policy is aimed at ensuring that occupiers are not left in conditions that unacceptably affect their health and safety and to also protect the housing stock and Watford's living environment. Any enforcement would be taken in line with the current [Compliance Policy](#). Enforcement will also be considered where other approaches have failed, for example, where an adjoining property causes a housing-related nuisance or annoyance.

Use of legislation such as issuing Community Protection Notices under the [Anti-Social Behavior, Crime and Policing Act 2014](#) will also be considered.

10.4.2 Rented Properties (private and social)

As set out in section 1, various legislation provides powers for Environmental Health to enforcing housing standards in rented properties owned by private landlords as well as housing associations.

11.0 Fees and Charges

The principle within this policy is to charge cost recovery fees on Safer Homes and Project Loans where appropriate.

Grants are considered too small in nature and unreasonable for vulnerable clients to have the additional burden to fund. The Safer Homes Loan or Project Loan would incorporate fees which are added to the cost of the loan and to the charge put on the property. The fee is repayable in the same terms as the loan itself and remains interest free.

Details of the fees are set out in the fees and charges summary available on request.

12.0 Eligibility and Conditions for Assistance

The applicant must meet the Council's detailed eligibility conditions for the type of assistance they are requesting (detailed in the relevant appendices) unless there are exceptional circumstances.

12.1 Applications for Assistance in Exceptional Circumstances

Exceptional circumstances relating to eligibility and conditions not covered by any of the other provisions in this policy will be considered through the Policy Panel to whom the applicant will need to submit in writing a justification for exceptional treatment. This panel consists of the Head of Environmental Health & Licensing (or the Head of Community and Environmental Services in their absence) and one of the Environmental Health Managers.

Examples of a situation where the Policy Panel may consider cases include:

- In certain circumstances an applicant may not have applied to receive all of the benefits they are entitled to. Where an applicant would qualify to receive a benefit that would mean they would be considered under the terms of the normal policy then they may be considered under the exceptional circumstances policy.
- People with Special needs or for reasons of mental or social impairment; some owners neglect both themselves and their properties.
- Assistance to move to more suitable or supported accommodation may be appropriate instead of the offer of a loan to complete works to a property; where the cost of the work would be more than the cost of the expenses to move (such as solicitors fees, etc...) and where the new property or accommodation is free from hazards or defects.

- An application for assistance where the individual fails to meet the eligibility criteria but there are valid reasons why assistance should be considered. For example, there may be circumstances where an individual returns for assistance before the 5 year exclusion has elapsed because of valid reasons individual to that person.
- Where there is a risk of a class 1 or 2 health outcome (see [HHSRS guidance](#)) danger to an occupant, where the occupant is deemed physically vulnerable but may not meet the income qualification criteria. In this instance assistance will seek to mitigate the class 1 or 2 health outcome and seek to recover costs through a charge on the property.
- In specific circumstances where the occupant is deemed physically vulnerable but may not meet the income qualification criteria and where works may enable or unlock other funding; such as a property clearance to enable a DFG application to take place. In this instance assistance will seek to recover costs through a charge on the property.

Service Standards

13.0 Service Standards

The following Service standards aims apply to the provision of services under this strategy:

- [Current Customer standards](#)
- Once a **complete application** for financial assistance has been received (all paperwork, forms and evidence) the application will be determined within 6 months. This is subject to discretionary funding being available. (Please note that The Home Improvement Agency has its own standards)
- 90% customer satisfaction rating for the service.

14.0 Complaints and Appeals

14.1 Complaints

Complaints are where a service user is dissatisfied. For example they may feel they have been treated unfairly or disrespectfully, the council has not done something in this policy we should have done or delivered a poor service or failed to meet agreed timescales.

Where a service user is dissatisfied with the service that they have received and they have been unable to resolve the issue or are unsatisfied with the officers response, the following Council's Complaints Procedure should be followed:

1st Stage

To put their complaint in writing, by telephone, by email or via the Customer Service Centre. A written response will be provided within 10 working days. If further time is needed then the Council will advise the service user that they are not able to respond within these timescales or if they need to handle the complaint differently.

2nd Stage

If the service user is not satisfied with the response they receive at stage 1 then, within 15 working days of receiving that response, they can ask for their complaint to be escalated to the 2nd stage. A manager, usually from Environmental Health & Licensing will investigate and provide a written response will be provided within 10 working days. The service user can ask to have a meeting. If this happens then the service user will then receive a response within five working days from the date of the meeting.

3rd Stage

If the service user is still not happy with the way the Council has handled their complaint and they have already gone through both steps of the complaints procedure then they have exhausted the Council's complaint procedure and can

then contact the [Local Government Ombudsman](#)

The Local Government Ombudsman

Po Box 4771

Coventry

CV4 0EH

Tel : 0300 061 0614

<http://www.lgo.org.uk/>

14.2 Appeals

Appeals are:

- The complaint process above has been followed
- where a service user does not believe that the formal action that the Council has decided to take is correct (e.g. the service of an enforcement notice) or
- a service user does not believe that the correct decision has been made in relation to their application for assistance

14.2.1 Appeals against the service or contents of a formal notice are to be via the statutory appeals process associated with that notice.

14.2.2 The following mechanism is provided for appeals relating to decisions that have been made in relation to service users' application for assistance.

1st Stage

Inform the Head of Environmental Services of the reason why the service user believes an incorrect decision has been made. This can be done in writing, by telephone, by email or via the Customer Service Centre. The Head of Service will pass the appeal to the Manager responsible for implementing this policy to investigate. A written response will usually be provided within one month subject to the appellant providing any necessary information when requested. Timescales may increase where further information, referrals etc. are required.

2nd Stage

If the outcome is not satisfactory the appeal can be heard by the Policy Panel, consisting of the Head of Environmental Services and two other Environmental Services Managers (or their equivalent from another service) not associated with the case.

The policy panel will consider appeals only where they meet one or more of the grounds for appeal as follows:

- The decision contradicted the Council's stated policy
- There is evidence of a relevant change in circumstances

- There is new relevant factual information
- The decision contradicted the principles laid down for requests for financial assistance outside the policy

3rd Stage

The individual should take independent advice on the options available to them.

15.0 Review of this policy

This policy will be reviewed when there are legislative changes or changes in council strategy or policy, that impact on its contents. It will also be reviewed if evidence that changes are needed come to light. Minor changes during the lifetime of the policy may be made in consultation with the Portfolio Holder and the Head of Environmental Services. Major changes to this policy will need consultation.

Appendices

APPENDIX A - CONDITIONS FOR ALL FINANCIAL ASSISTANCE

- All applicants must be aged 18 or over on the date of application
- The property must be in the Watford Borough Council area
- The Council will not accept applications from:-
 - Other local authorities
 - Any property owned by Watford Borough Council
 - Housing Action Trusts
 - Housing Trusts
 - Health Authorities
 - NHS Trusts
 - Police Authorities
 - Housing Associations/Registered Providers
 - (the only exception being DFGs; or for Projects loans where the specific conditions allow for them to receive the grant).
- All properties must be at least 10 years of age
 - with the exception of DFGs
 - where there are extenuating circumstances
- Applications will not be considered if works have already commenced or been completed (prior to an application being submitted and formerly approved)
 - unless the works have commenced in order to comply with a notice or HMO license document in circumstances where this is relevant to the assistance provided.
 - The terms set out in a Project Loan override this principle
- All applicants will be required to fill in the Council's application form and provide all supporting documentation. They must state the nature of the works that they wish to be undertaken and provide at least two competitive estimates from independent contractors that realistically reflect the cost of the works (unless expressly told by the officer that two quotes are not required). Where relevant, a party submitting estimates must be members of appropriate professional bodies e.g. GasSafe, NICEIC etc. In some circumstances, one estimate may be accepted if officers are satisfied that the estimate is reasonable for the work required. Applicants must also provide details of any preliminary or ancillary costs e.g. architects' or surveyors' fees.

The Council will recalculate approved financial assistance award if the actual cost of the work is lower or higher than the original approved award – for example where pre agreed changes to the award take place due to unforeseen works or any reassessment of the original work.

All applicants must either:

- own the property or
- be a tenant* responsible for carrying out the work and have the owner's written consent for the work to be done and provide evidence of this in either case.

- For certain Project Loans in special circumstances be a tenant without responsibilities, in which case the landlord would be required to apply on the tenants behalf.

*For the purposes of the above 'tenant' includes :

- A secure tenant or statutory tenant
- A protected occupier under the rent (Agriculture) Act 1976 or a person in occupation under an assured agriculture occupancy within the meaning of Part I of the Housing Act 1998 and
- An employee (whether full time or part time) who occupies the dwelling or flat concerned for the better performance of their duties

But does not include a tenant of

- Other local authorities
- Any property owned by Watford Borough council
- Housing Action Trusts
- Housing Trusts
- Health Authorities
- NHS Trusts
- Police Authorities
- Housing Associations/Registered Providers
- (the only exception being DFGs; or for Projects loans where the specific conditions allow for them to receive the grant).

- Applications will not normally be considered if the Council has given financial assistance for the same property during the previous five years, unless the individual assistance conditions say otherwise. In some cases secondary assistance will be considered where the new assistance is for something different and the works were unforeseen at the time of the primary assistance was given (with the exception of project loans).
- Where the income or benefits of members of the household other than the applicant are to be taken into consideration same sex partners as defined in the Civil Partnership Act 2004 will be assessed in the same way as partners of opposite sex.
- For five years after the assisted works have been completed the property must be occupied as the only or main residence of the applicant or a member of his family. Failing this the Council will require repayment of the assistance.

- The Council will also require repayment of the amount of grant/loan paid including all installments and final payments if the property is “disposed of” either during completion of the works (i.e. before the certified date) or within 7 years of the completion of the works. Appendix E explains the meaning of “disposal”.
- The Council will also require repayment of the amount of grant/loan paid including all installments if the applicant fails to allow the works to be completed without a valid reason.
- The Council will also require repayment (full or proportionate) if the works for which the grant/loan was awarded are the subject of an insurance or legal claim which the applicant successfully recovers (fully or partly).
- The Council will not entertain an application for elements of work that are subject to insurance or legal claims until the claim is determined except in exceptional circumstances.
- The amount of assistance provided as a loan will be registered by the Council as a local land charge on the property for 7 years. The cost of this will be included in the Assistance amount and costs determined. Applicants need to sign their consent to the charge being placed.
- The Council will not consider applications if the applicant does not provide all the evidence reasonably requested by the Council.
- Applications will not normally be considered if the client or another member of the household who has previously received a grant/loan for the property has failed to service or maintain equipment, systems, services and building elements as previously recommended by any council specification. The exceptions are:-
 - DFGs
 - Extenuating circumstances
- All applicants will be required to complete the work within 12 months from the date that their application is approved.
- Any grant/loan may be paid by installment, with at least 10% being retained until the Council is satisfied that the works have been completed to their satisfaction. Any installments will be made payable directly to the contractor employed to undertake the work, who will have to be the named contractor on the grant/loan approval, unless the Council agrees in writing for a different contractor to be employed (this written permission must be obtained before they commence the works). The exception to this is in the case of Project loans where grants may be paid directly to landlords, home owners or other agents according to the specifics of the scheme.

- No payment will be made without a valid invoice or receipt of payment.
- The Council will require the grant/loan to be repaid if the applicant ceases to be eligible for it before the works have been completed.
- If the applicant has supplied the Council with false, inaccurate or incomplete information in order to obtain the grant/loan, or if works have been started before it has been approved repayment will be required.
- In calculating time periods dates will be taken from the date that the works are deemed to be completed by the officer.
- No assistance is available for second homes or holiday homes.
- If the work for which financial assistance is approved is not completed then any interim payments that have been made will be reclaimed from the client.
- Where the cost of the work exceeds the maximum or a contribution is required the Council must be satisfied before approving the financial assistance that the applicant can raise the rest of the funds to do the necessary work and that any applicant contribution is made prior to any council funded contribution.
- The ownership, maintenance and running costs of improvements become the sole responsibility of the applicant upon completion (in the case of DFGs a maintenance agreement may be paid for by Watford Borough Council for some pieces of equipment and the client is to contact the person providing the agreement for further assistance)
- Works are to be completed in accordance with the standard specifications as produced by the Council.
- The Council will require repayment of the loan/grant if there is any breach of Development Control or Building Regulations requirements in relation to the assisted works.

House Boats and Mobile Homes

The above provisions apply to house boats* and mobile homes** subject to the following:

- Any person lawfully in occupation of the house boat or mobile home shall be treated as a person with an owner's interest in or a tenant of a dwelling
- The Council will only accept applications for assistance from house boats and mobile homes where the residence requirement is met.

- The residence requirement in the case of a house boat is that the Council are satisfied that :
 - The applicant has occupied the boat as their only or main residence for a period of at least three years immediately preceding the date of application;
 - The boat has for that period had its only or main mooring in the same locality on an inland waterway within the boundary of Watford Borough Council; and
 - The applicant has a right to moor their boat there.

- The residence requirement in the case of a mobile home is that Watford Borough Council are satisfied that :
 - The applicant has occupied the mobile home as their only or main residence for a period of at least three years immediately preceding the date of application;
 - The mobile home has for that period been on land forming part of the same protected site within the meaning of the Mobile Homes Act 1983; and
 - The applicant occupied it under an agreement to which that act applies or under a gratuitous agreement.

*‘House boat’ means a boat or similar structure designed or adapted for use as a place or permanent habitation which is a dwelling for the purposes of Part I of the Local Government Finance Act 1992 (Council tax)

**‘Mobile home’ means a caravan within the meaning of Part I of the Caravan Sites and Control of Development Act 1960 (disregarding amendment made by section 13(2) of the Caravan Sites Act 1968) which is a dwelling for the purposes of Part I of the Local Government Finance Act 1992

APPENDIX B - CONDITIONS FOR SAFER HOMES GRANT (SHG)

In addition to the conditions that apply to all financial assistance (see Appendix A) the following applies to SHG's:

- The applicant must occupy the property and have occupied it as their only or main residence for the 3 years immediately preceding the date of application.
- To be eligible to receive this financial assistance the applicant's household must meet the Government's definition of vulnerable through the '[Affordable Warmth Group](#)' or be in receipt of Housing Benefit or Watford Borough Council Tax Reduction. The Council will follow any changes to this Government definition and to changes to their own set benefit criteria. The current definition is found in appendix F.
- An application for SHG will not normally be considered if any type of financial assistance (with the exception of DFGs and Project Loans) has been given in the previous 7 years except in extenuating circumstances (e.g. to enable early discharge from hospital) or where the works are part of an additional application
- Where there are extenuating circumstances and not all the works necessary can be done under a single application then additional applications can be made (for example a person's age, or infirmity, or because of practical reasons agreed by the Council.) Successive applications for this assistance may be made up to the maximum SHG limit of £1,000 over a 5 year period if eligibility criteria are still met. In calculating time periods dates will be taken from the date that the works are deemed to be completed by the Council officer. After that the owner or any other occupant of the dwelling may not re-apply for SHG for 7 years. The total cost of all the necessary works will be determined before any assistance is given.
- The financial assistance covers 100% of the necessary works up to a maximum of £1,000 and is given in the form of a grant awarded to the applicant* on completion. *Payments are made directly to the approved contractor nominated at the award of the grant on behalf of the applicant on satisfactory completion of the works.
- Where there are unforeseen works these will be included within a grant up to a maximum of a 100% increase (i.e. a total grant of up to £2,000) and be subject to pre-approval by the council before the works commence
- In order to receive the SHG the applicant must carry out all the work on the schedule that accompanies the approval. If they do not agree to the work being completed the grant will not be approved (unless there are extenuating circumstances for example ill health)
- The works that are classed as "eligible works" for SHG are :

- | |
|--|
| <ul style="list-style-type: none">• Removal of HHSRS Hazards• Prevention of Cat 1 HHSRS Hazards |
|--|

- Work that leads to the enabling of HHSRS hazard mitigation
- Housing defect rectification that alleviates an individual's state of physical, mental and social well-being as determined within the remit of this policy by the council
- As an incentive tool to encourage other assistance such as a Safer Homes Loan or to engage vulnerable residents to work with other external agencies and services

- Works will be given in the order of priority that alleviates the worst conditions that are the most detrimental to health, unless there are extenuating circumstances when the order of priority may be changed by the Council Officer. Where not all the works can be done within the grant limit then the lowest priority will be omitted from the approval works schedule.
- The works for which SHG is approved will be in the priority shown in the schedule that accompanies the approval. If additional unforeseen works arise then these will be prioritised along with all the other works. This may result in some works being pushed down the priority scale and if the cost of the works is greater than the grant limit then the lowest priority works may not be covered at all.
- Where a grant for up to £1,000 is approved if unforeseen works are required then they will be given as part of the grant up to a total cost for the works of £2,000. If additional works take the cost over £2,000 then the grant will be converted to a loan.

Safer Homes Grant checklist

Safer Homes Grant - Checklist	
a) Referral by a health or housing professional	✓
who	
b) Qualifying benefit*	✓
which benefit	
c) Or would be entitled to receive	✓
which benefit	Notes: why they have not applied or in the process of...
d) Owner or private rented tenant with repairing responsibilities	✓
e) >10 year old property	✓
f) Applicant has had no previous discretionary assistance within 7 years*	✓
g) Occupied for previous 3 years	✓
h) Approved works no more than £1,000 limit	✓
i) *Or in exceptional circumstances via Grant Panel; where there is a risk to a class 1 or 2 health outcome to a resident deemed vulnerable	✓
brief description of risk and vulnerability	
j) Meets the conditions as set out in the relevant grant appendices	✓

APPENDIX C - SAFER HOMES LOAN (SHL)

In addition to the conditions that apply to all financial assistance (see Appendix A) the following applies to SHL's:

- The applicant must occupy the property and have occupied it as their only or main residence for the 3 years immediately preceding the date of application.
- To be eligible to receive this financial assistance the applicant's household must meet the Government's definition of vulnerable through the '[Affordable Warmth Group](#)' or be in receipt of Housing Benefit or Watford Borough Council Tax Reduction. The Council will follow any changes to this Government definition and to changes to their own set benefit criteria. The current definition is found in appendix F.
- An application for SHL will not normally be considered if any type of financial assistance (with the exception of DFGs) has been given in the previous 7 years except in extenuating circumstances (e.g. to enable early discharge from hospital) or where the works are part of an additional application (see point below)
- The financial assistance covers 100% of the necessary works up to a maximum of £10,000 and is given in the form of a loan awarded to the applicant* on completion.

*Payments are made directly to the approved contractor nominated at the award of the grant on behalf of the applicant on satisfactory completion of the works.

- Where there are unforeseen works these will be included within a loan up to a maximum of a £2,000 increase (i.e. a total grant of up to £12,000) and be subject to preapproval by the council before the works commence
- In order to receive the SHL the applicant must carry out all the work on the schedule that accompanies the approval. If they do not agree to the work being completed the loan will not be approved (unless there are extenuating circumstances for example ill health)
- Where there are extenuating circumstances and not all the works necessary can be done under a single application then additional applications can be made (for example a person's age, or infirmity, or because of practical reasons agreed by the Council.) Successive applications for this assistance may be made up to the maximum SHL limit of £10,000 over a 5 year period if eligibility criteria are still met. In calculating time periods dates will be taken from the date that the works are deemed to be completed by the Officer. After that the owner or any other occupant of the dwelling may not re-apply for SHL for 7 years. The total cost of all the necessary works will be determined before any assistance is given.

- The works that are classed as “eligible works” for SHL are :

- Removal of HHSRS Hazards
- Prevention of Cat 1 HHSRS Hazards
- Work that leads to the enabling of HHSRS hazard mitigation
- Housing defect rectification that alleviates an individual’s state of physical, mental and social well-being as determined within the remit of this policy by the council

- Works will be given in the order of priority that alleviates the worst conditions that are the most detrimental to health, unless there are extenuating circumstances when the order of priority may be changed by the Officer. Where not all the works can be done within the grant limit then the lowest priority will be omitted from the approval works schedule.
- The works for which SHL is approved will be in the priority shown in the schedule that accompanies the approval. If additional unforeseen works arise then these will be prioritised along with all the other works. This may result in some works being pushed down the priority scale and if the cost of the works is greater than the grant limit then the lowest priority works may not be covered at all.
- The loan is interest-free indefinitely. It would be repayable only when the applicant disposes of the property. (Disposal is defined in Appendix E). Requests to defer repayment because of hardship/extenuating circumstances will be considered by the policy panel, which has the discretion to write off debts when there is no reasonable prospect of repayment.
- The applicant would be free to repay this loan fully or partly at any time without penalty.
- All reasonable fees associated with this loan are included in the loan, unless that would exceed the maximum loan: in which case the Council will bear any excess. Fees charges are detailed in our fee charging policy available on request.

Loans for House Boats and Mobile Homes

Definitions here are as before described under Safer Homes Grant

Safer Homes Loan checklist

Safer Homes Loan - Checklist	
a) Referral by a health or housing professional	✓
who	
b) Qualifying benefit*	✓
which benefit	
c) Or would be entitled to receive	✓
which benefit	Notes: why they have not applied or in the process of...
d) Owner or private rented tenant with repairing responsibilities	✓
e) >10 year old property	✓
f) Applicant has had no previous discretionary assistance within 7 years*	✓
g) Occupied for previous 3 years	✓
h) Approved works no more than £10,000 limit	✓
i) *Or in exceptional circumstances via Grant Panel; where there is a risk to a class 1 or 2 health outcome to a resident deemed vulnerable	✓
brief description of risk and vulnerability	
j) Meets the conditions as set out in the relevant grant appendices	

APPENDIX D - PROJECT LOAN/GRANT

- All loans and grants will seek to improve housing condition or improvements in housing related works that lead to a health improvement for the occupant.
- The loan or grant will have set criteria dependent on the project it is linked to. Specific details of each available project loan or grant will be published online (and are available in print on request). The projects will follow considerations made through the Project template (check list)
- Criteria will be set and approved by the Head of Environmental Health & Licensing in consultation with the Portfolio Holder and be aligned with the current Councils corporate objectives and priorities.
- A fee is charged for cost recovery and added to the cost of the loan or grant if appropriate in accordance with our fee charging policy. The loan or grant limit of a maximum of £5,000 excludes the cost of any fee.

Project Loan/Grant - Checklist	
a) Improves the condition of the home(s)	
how	
b) Has a positive effect on the health of the occupant(s) through improvement of the housing condition	✓
how	
c) The loan or grant is at least match funded; where the amount offered does not exceed the capital expenditure of other supplementary funding (such as other grant funding or resident contributions)	✓
Loan/grant limit (no more than £5,000)	Other funding details
d) Preference is for this project assistance to be given as a loan	✓
If it is to be a grant, explain why: n/a (for a loan) or give reason for grant	
e) Geographic area of the project	
Define the project area (i.e. whole Watford borough)	
f) The loan is available for Owner Occupiers	✓
or private rented tenants with repairing responsibilities	
or to a private rented sector landlords (assistance is not available to any other landlords or organisations)	
g) Approved by portfolio holder and head of environmental health	✓
h) Meets conditions set out in the relevant grant appendices	✓
i) Other loan criteria details as defined by the project brief	✓
j) Other loan criteria details as defined by the project brief	✓
k) Other loan criteria details as defined by the project brief.....	✓

APPENDIX E - DISPOSAL

Definition of disposal

- (1) A disposal (whether of the whole or part of the dwelling) is a relevant disposal for the purposes of the provisions of this policy relating to grant or loan conditions if it is –
- (a) a conveyance of the freehold or an assignment of the lease, or
 - (b) the grant of a lease (other than a mortgage term) for a term of more than 21 years otherwise than at a rack rent.
- (2) For the purposes of subsection (1) (b) it shall be assumed –
- (a) that any option to renew or extend a lease or sub-lease, whether or not forming part of a series of options, is exercised, and
 - (b) that any option to terminate a lease or sub-lease is not exercised.
- (3) The grant of an option enabling a person to call for a relevant disposal shall be treated as such a disposal made to him.

Exempt disposals

- (1) A disposal is an exempt disposal for the purposes of the provisions of this policy relating to grant or loan conditions if it is a disposal of the whole or part of the premises to which the application relates of any of the following descriptions-
- (a) a conveyance of the freehold or an assignment of the lease where the person, or each of the persons, to whom it is made a qualifying person (as defined in subsection (2));
 - (b) a vesting in a person taking under a will or on an intestacy (this exemption applies only to grants, not to loans);
 - (c) a disposal in pursuance of any such order as is mentioned in subsection (3);
 - (d) a compulsory disposal (see subsection(4));
 - (e) a disposal of property consisting of land included in the dwelling by virtue of section 184 of the Housing Act 1985 (land let with or used for the purposes of dwelling-house);
 - (f) a disposal under which the interest of a person entitled to assistance by way of repurchase under Part XVI of that Act (assistance for owners of defective housing) is acquired in accordance with Schedule 20 to that Act;
 - (g) a disposal by way of enfranchisement or lease extension under Part I of the Leasehold Reform Act 1967;
 - (h) a disposal in pursuance of an obligation arising under Chapter I or II of Part I of the Leasehold Reform, Housing and Urban Development Act 1993;

- (i) a disposal on the exercise of a right of first refusal under Part I of the Landlord and Tenant Act 1987 or in accordance with an acquisition order under Part III of that Act;
- (j) a disposal on the exercise of –
 - (i) the right to buy under Part V of the Housing Act 1985, or
 - (ii) the right conferred by section 16 of the Housing Act 1996 (right of tenant of registered social landlord to acquire dwelling);
 - (iii) a conveyance of the freehold or an assignment of the lease where -
 - (iv) the person making the disposal is aged at least 70,
 - (v) the disposal is to provide an annuity income, and
 - (vi) the person concerned is entitled to continue to occupy the premises as his only or main residence.

(2) A person is a qualifying person for the purposes of subsection (1)(a) if –

- (a) in the case of an individual, he is –
 - (i) the person, or one of the persons, by whom the disposal is made;
 - (ii) the spouse, or former spouse, of that person or one of those persons; or
 - (iii) a member of the family of that person or one of those persons; or
- (b) in the case of a company, it is an associated company of the company by whom the disposal is made.

Section 416 of the Income and Corporation Taxes Act 1988 (meaning of associated company) applies in determining whether a company is an associated company of another for the purposes of paragraph (b).

(3) The orders referred to in subsection (1)(c) are orders under –

- (a) section 24 or 24A of the Matrimonial Causes Act 1973 (property adjustment orders or orders for the sale of property in connection with matrimonial proceedings);
- (b) section 2 of the Inheritance (Provision for Family and Dependents) Act 1975 (orders as to financial provision to be made from estate);
- (c) section 17 of the Matrimonial and Family Proceedings Act 1984 (property adjustment orders or orders for the sale of property after overseas divorce, etc.); or
- (d) paragraph 1 of Schedule 1 to the Children Act 1989 (orders for financial relief against parents).

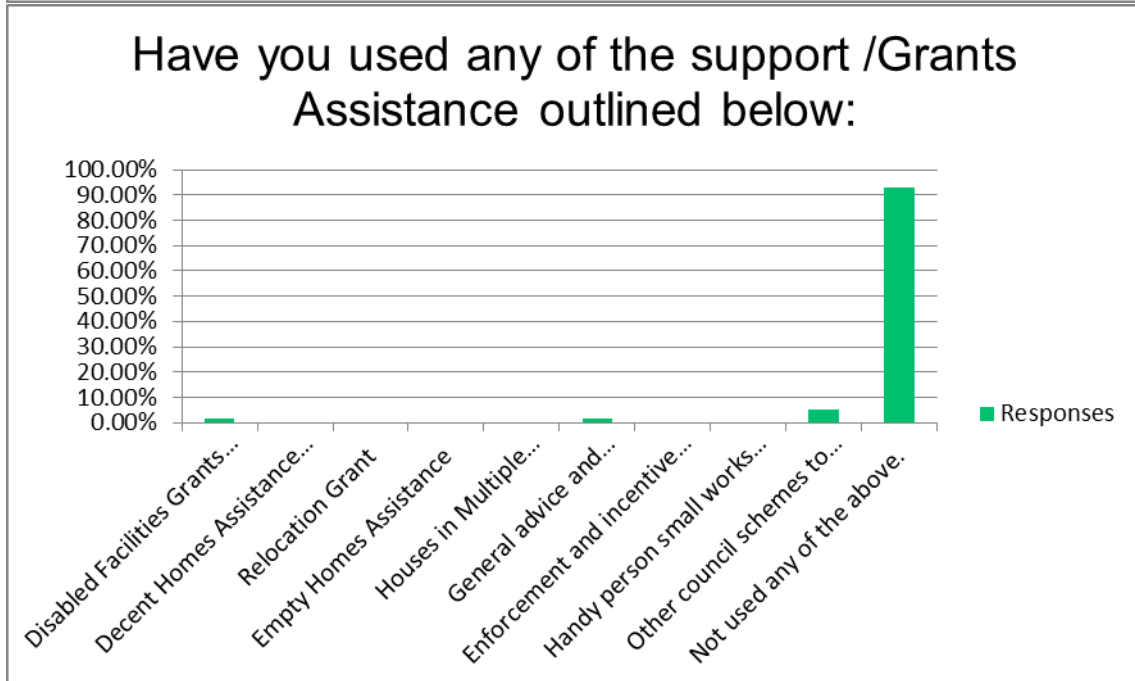
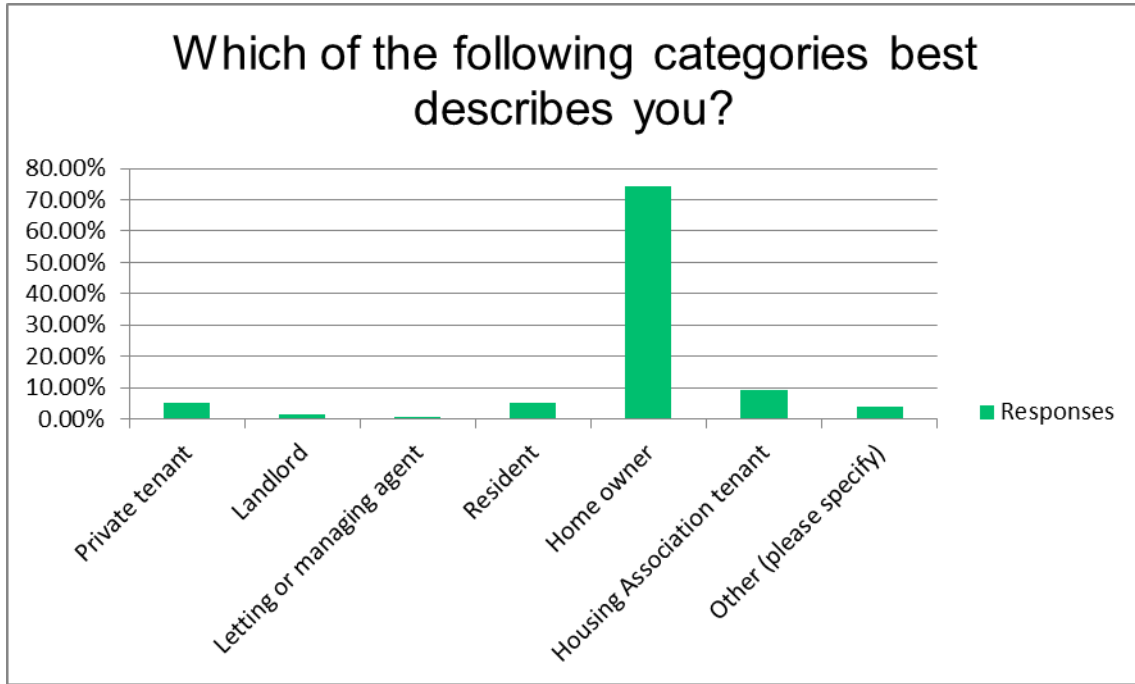
(4) For the purposes of subsection (1)(d) a compulsory disposal is a disposal of property which is acquired compulsorily, or is acquired by a person who has made or would have made, or for whom another person has made or would have made, a compulsory purchase order authorising its compulsory purchase for the purposes for which it is acquired.

APPENDIX F - DEFINITION OF VULNERABLE

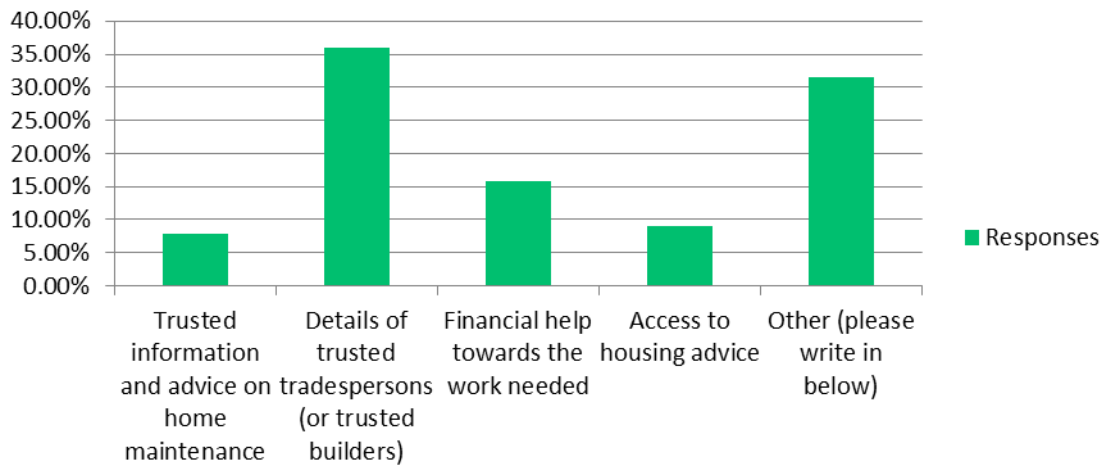
- It is proposed that this policy will stay aligned with any changes to the Affordable Warmth group, Housing Benefit and Watford's Council Tax Reduction Scheme definition, subject to these changes still delivering the principles and aims of this policy.
- Following any changes to these groups made by government or by the Council is deemed a minor change and would be subject to delegated authority under this policy; unless the changes make for a fundamental change in position.
- The table below summarises the definition

April 2017					
Housing benefit					
OR					
Watford Council Tax Reduction					
OR					
Income-related Employment and Support Allowance					
Income-based Jobseeker's Allowance					
Income Support					
Pension Guarantee Credit					
OR					
Tax Credits; On the condition that the household's relevant income does not exceed the amount set below:					
Type of claim	Number of children or qualifying young persons for whom the claimant is responsible				
	0	1	2	3	4 or more
Single claim	£13,200	£17,400	£21,600	£25,800	£30,000
Joint claim	£19,800	£24,000	£28,200	£32,400	£36,600
OR					
Universal Credit; On the condition that the household's relevant income does not exceed the amount set out below:					
Type of claim	Number of children or qualifying young persons for whom the claimant is responsible				
	0	1	2	3	4 or more
Single claim	£1,100	£1,450	£1,800	£2,150	£2,500
Joint claimant	£1,650	£2,000	£2,350	£2,700	£3,050

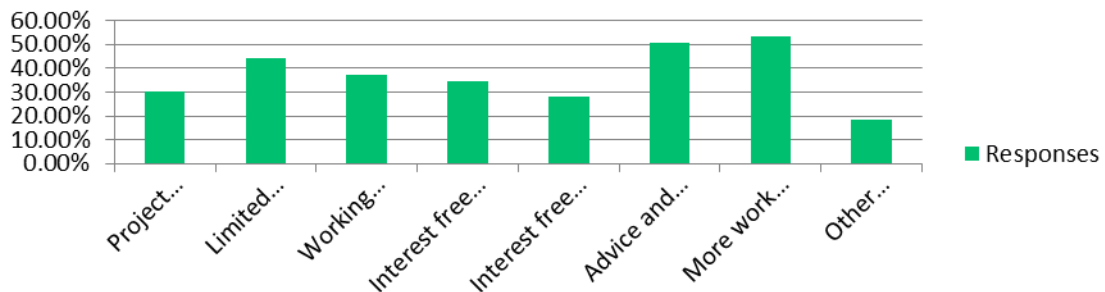
APPENDIX G - PUBLIC CONSULTATION (summary)



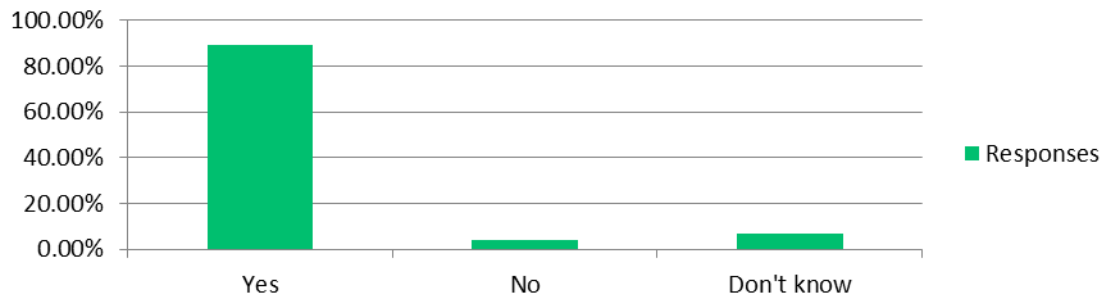
Thinking about your most difficult / pressing housing issues, what would help you resolve these?



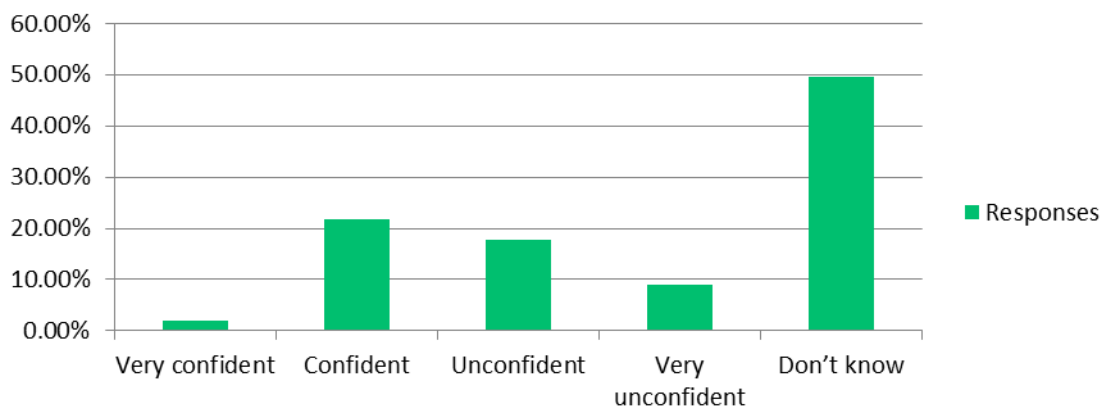
Considering financial pressures, but also taking into account the council's role within the town and its commitment to its more vulnerable residents, what do you think the council should continue to offer in terms of housing assistance? (tick all...)



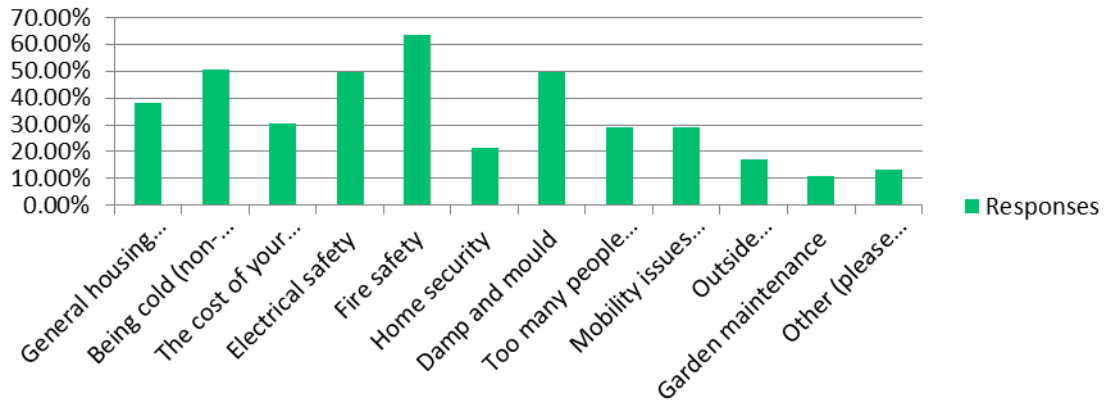
Do you think the council should continue to improve energy efficiency and reduce carbon emissions to homes in Watford which helps to address fuel poverty (where people are unable to afford to adequately heat their home)?



How confident are you that the council's current policies deal with the poor housing conditions that affect the most vulnerable households?



What housing related issues are most important to you that you think the council should prioritise?(tick all that apply up to a maximum of 5 choices)



References

[Choosing Health](#)
[Housing Act 2004](#)
[Housing white paper](#)
[Laying the Foundations: A Housing Strategy for England](#)
[Choosing Health](#)
[The health impacts of poor private sector housing, LACORS, 2010](#)
[Integrated Care: Our Shared Commitment, Department of Health, 2013](#)
[Healthy lives, healthy people: Improving outcomes and supporting transparency](#)
[Joint Strategic Needs Assessment and joint health and wellbeing strategies explained](#)
[Housing Quality & Health](#)
[Environmental Health](#)
[The cold weather plan for England](#)
[Respiratory Disease](#)
[information for Watford collected by DCLG](#)
[The Housing Act](#)
[the National HMO Network](#)
[DCLG Government response document](#)
[Watford's current Local Plan](#)
[The Welfare Reform and Work Act 2016](#)
[Welfare Reform Act 2012](#)
[Localism Act](#)
[The Energy Company Obligation \(ECO\)](#)
[Herts Warmer Homes](#)
[Watford's HECA report 2017](#)
[Cutting the cost of keeping warm](#)
[Fuel Poverty \(England\) Regulations 2014](#)
[Health and Hazard Safety rating System](#)
[Safe and Well scheme](#)
[Health & Hazard Safety Rating System](#)
[Corporate plan to 2016-2020](#)
[Watford Housing Strategy 2015-2020](#)
[Home Energy Conservation Act 1995](#)
[English Housing Survey](#)
[Review of Property Conditions in the Private Rented Sector](#)
[Watford Borough Councils Housing Strategy 2015-2020](#)
[Quality Adjusted Life Years](#)
[affordable warmth group](#)
[Housing Benefit](#)
[Watford Borough Council Tax Reduction scheme](#)
[Street Improvement Project](#)
[Which trusted traders](#)
[Hertfordshire Home Improvement Agency](#)
[Herts Warmer Homes scheme](#)
[AgeUK Dacorum Handyperson Service](#)
[Health & Hazard Safety Rating System](#)

[affordable warmth group](#)
[affordable warmth group](#)
[Health & Hazard Safety Rating System](#)
[Affordable Warmth Group](#)
[affordable warmth group](#)
[Which trusted traders](#)
[Hertfordshire Home Improvement Agency](#)
[Disabled Facilities Grants](#)
[Compliance Policy](#)
[Anti-Social Behavior, Crime and Policing Act 2014](#)
[data on empty properties](#)
[Local Government Ombudsman](#)
<http://www.lgo.org.uk/>
[Current Customer standards](#)
[Housing Strategy](#)
[Affordable Warmth Group](#)
[Affordable Warmth Group](#)

For further information contact the Environmental Health and Licensing Service,
Town Hall, Watford, Herts, WD17 3EX. Telephone 01923 278503.
e-mail: envhealth@watford.gov.uk