

REPORT TO:	CABINET 26 July 2021
SUBJECT:	Private Sector Housing Assistance Policy 2021
LEAD OFFICER:	Alison Knight – Interim Executive Director of Housing Yvonne Murray – Director of Housing Assessments and Solutions
CABINET MEMBER:	Councillor Patricia Hay- Justice Cabinet Member for Homes
WARDS:	ALL

COUNCIL PRIORITIES

[Council's priorities](#)

- We will live within our means, balance the books and provide value for money for our residents.
- We will focus on tackling ingrained inequality and poverty in the borough. We will follow the evidence to tackle the underlying causes of inequality and hardship, like structural racism, environmental injustice and economic injustice.
- We will focus on providing the best quality core service we can afford. First and foremost, providing social care services that keep our most vulnerable residents safe and healthy. And to keep our streets clean and safe. To ensure we get full benefit from every pound we spend, other services in these areas will only be provided where they can be shown to have a direct benefit in keeping people safe and reducing demand.

Summary of Report

The Housing Assistance Policy 2021 sets out how the Council will provide assistance to homeowners and private tenants to enable them to keep their homes in good repair and free of hazards, and enable them to live as independently as possible.

The Policy also sets out the assistance available to disabled people to help them adapt, improve or repair their homes. Poor quality housing has an impact on the health of the occupants and on the quality of life in an area.

Improving the condition of private sector properties contributes to the regeneration of the borough and towards the target for increasing the number of decent homes occupied by vulnerable households in the private sector.

Raising standards in these properties contributes to safer, stronger and more sustainable communities, improving health and wellbeing and improving the environment, and by allowing people to remain living in their own homes reduces the financial pressure on the council by reducing costs of long term care.

Reduces the cost of temporary accommodation if their home is not habitable, due to disabilities, as a Council has duty under the Housing Act.

FINANCIAL IMPACT

A total of £2.9 million budget is included within the 2021/22 (provisional) Housing Investment Programme for expenditure on the housing renewal programme. This is comprised of £2. million of Disabled Facilities Grant and £0.5m Empty Homes Grant.

The DFG grant for 21/22 has been confirmed, after the budget was originally set, as £2.99m – an increase of £0.59m on the original budget. Additionally, the limit on secured homeowner loans is to be set at a limit based on the prior year repayment income received, for 2021/22 this will be £0.23m. The Housing Assistance Policy amendments reflect the need to keep expenditure within this budget.

FORWARD PLAN KEY DECISION REFERENCE NO.: 1821CAB

The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

Cabinet is recommended to:

- 1.1 Approve the Private Sector Housing Assistance Policy 2021 (“the Policy”), Appendix A to this report.
- 1.2 Delegate authority to the Executive Director of Housing to make minor amendments to the Policy including in relation to typographical errors or updating post holders titles as necessary.
- 1.3 Note that in respect of the 6 month Pilot Scheme detailed at paragraph 3.4 of the report and Section 10 of Appendix A, the outcome of the Pilot will be reported back to Cabinet to determine whether or not it is appropriate for the Pilot scheme to be incorporated into the Private Sector Assistance Policy beyond that 6 month time frame.

2. EXECUTIVE SUMMARY

- 2.1 The Regulatory Reform (Housing Assistance) (England and Wales) Order 2002 (“The Order”) permits the Council to provide assistance in relation to housing in certain circumstances and subject to certain requirements but before the Council may do so, it is required to have adopted and to publish a Policy detailing how this assistance will be provided and the conditions which attach to that assistance. Historically the Council have called this the Housing Renewal Policy. The first Policy was agreed by Cabinet on 7 April 2003 and set out the assistance that the Council would give for housing renewal. It was agreed that the Policy should be subject to regular review. The Policy was last reviewed in 2013 (Minute A115/13) and amendments to cover empty properties were made in 2014

2.2 Croydon Private Sector Housing Assistance Policy 2021.

Croydon has had a housing assistance policy for many years detailing the types of assistance available. The previous policy, approved in 2014, has been

reviewed and the new draft policy sets out how Croydon proposes to use the various powers available, including the provision of financial assistance in the future.

Poor quality housing can have an impact on the health of the occupants and on the quality of life in an area. Though agreeing with the Government's view that it is primarily the responsibility of homeowners to maintain their own properties, the Council is committed to improving housing quality across all tenures.

It is accepted that some homeowners, particularly the elderly and the most vulnerable, do not have the necessary resources to keep their homes in good repair or to provide adaptations to assist with daily living. The provision of assistance by the Council benefits the health of the residents, protects and maintains the property and allows the residents to remain living independently.

The Order repealed much of the historic legislation governing the provision of renewal grants to homeowners and replaced it with a wide-ranging power to provide assistance for housing renewal in the private sector.

3. DETAIL

- 3.1 The Order provides the Council with wide ranging powers to assist private homeowners. The previous revision of the policy on housing assistance included a number of key changes to the types of assistance the Council would offer private homeowners.
- 3.2 The Current economic climate and financial restrictions in regard to budget have been taken into account when reviewing the policy. The Disabled Facilities Grant and Discretionary Disabled Facilities Grant are funded by a capital grant provided by the Government for the provision of adaptations in private sector housing. It should be noted that this funding can only be used for the purpose of DFG's. The budget has seen growth in the award to Croydon in the last 5 years from £1.2 million in to £2.9 million in 21/22.

Proposed changes and background reasons for change

- 3.3 The changes proposed below and detailed in the draft policy at Appendix A are based on evidence of local need, the need to maximise spend against Croydon's increased Disabled Facilities Grant budget and also on increases in building and other costs, especially in London, since the previous policy was approved in 2014.

The background to the need for continuing to provide assistance in the private sector as well as the Council's key priorities and an evidence base of local need are set out in section 1-4 of the draft policy.

It is recommended that the Council continue to provide:

- Mandatory Disabled Facilities Grants (Mandatory DFG)
- Home Investment Loans
- Home Repair Loans

- Croydon Energy Loans
- Empty Property Loans

3.4 Proposed changes to current policy, all of which will benefit residents of Croydon:

- Offer a new **Discretionary Disabled Facilities Grant' (DDFG)**. The proposals for this new funding are detailed in section 9 of Appendix A. This is intended to assist those residents with disabilities who may fall outside the current mandatory grant criteria or where the cost of the needed adaptation exceeds the mandatory maximum level of £30,000. For example the cost of multiple adaptations in a single home is not possible to fund within the mandatory grant limit and as such many much needed adaptations do not proceed for financial reasons.

All DFG applicants are means tested (except in the case of Children). As a result of this means test, if they are deemed to have a contribution towards the grant, but are unable to afford to fund this contribution we are proposing to include reasonable DFG client contributions under a DDFG –as a lifetime charge to be repaid. This is subject to consideration by and recommendations of the Private Sector Adaptations Panel (“the Panel”), The Panel are responsible for reporting in to and making recommendations for consideration by the Executive Director of Housing who makes the final decision. It is recommended that the Council create this discretionary DFG as part of the Policy to enable more people who are ‘cash poor and property rich’ to proceed with their adaptation and thereby support the Council’s objectives, including the priorities detailed earlier in the report.

- It is recommended that, as a 6 month Pilot scheme, the Council offer a new **‘Simple Adaptations Grant’** of up to £5000 that would not carry a means test or 10 year repayment condition (as is the case with the current mandatory DFG). This would be for single adaptations such as a ramp or stair lift or hoists specifically where that is the only adaptation recommended by the Occupational Therapist.
Although the majority of clients are ‘passported’ through the government’s mandatory means test on relevant benefits, it is thought that such a grant could help to provide simpler, single adaptations, where they are the only adaptation required, more quickly.

This is a recommendation suggested by the Ministry of Housing Communities and Local Government (“MHCLG”) to enable low level adaptations to be fast tracked, and would benefit people who are in need of a simple adaptation in order to be discharged home from hospital or residential care. After the 6 month period we will review and present the outcomes to Cabinet with a further recommendation as to whether or not this pilot is incorporated into the policy on a permanent basis. These proposals are detailed in section 10 of Appendix A.

- To increase the maximum amount of re-location funding from £7k to £10K allowed under Mandatory DFG to reflect the increased costs of moving house – to enable a greater uptake of this assistance and enable residents to move to a more suitable home that meets their disability needs or that can be adapted to

better suit them where their current home cannot. (Ref Private Sector Housing Assistance Policy section 8.31 Appendix A)

- The council currently gives £25k per unit to bring empty properties back into use **Empty Homes Grant** (Ref Private Sector Housing Assistance Policy section no. 13.0) on condition that the council is given nomination rights to the property, for 5 years, to use for badly needed temporary accommodation. As an extra incentive for Landlords we would like to add an additional financial assistance of £5000 where landlords agree to make the property accessible (wet rooms etc). The rationale behind this is that there is an acute shortage of adapted Temporary Accommodation (“TA”) properties. It is proposed that the council will retain nomination rights for 5 years to all adapted and non-adapted units.
- To increase the maximum amount for **Home Investment Loan** (Ref Private Sector Housing Assistance Policy section no.7.0) from £20,000 to £30,000 to reflect the increase in both material and building costs, particularly in London, since the previous policy was approved. This will enable us to give more assistance in renovating and repairing the homes of the most vulnerable residents, where appropriate. It allows us to focus on providing the best quality core services, we can afford that keep our most vulnerable residents safe and healthy in their own homes but also reducing high costs of residential care to the council, or expensive TA costs in some instances.

As an example of potential savings Repayable Loan v Residential Care. A repayable loan of up to £30k to upgrade electrical wiring, renew roof, renew windows, damp proofing work, would make the house safe and habitable for an older person to remain living independently. The annual cost of residential care to the council would be approximately £35- 40K per annum. Therefore ‘invest to save’ would enable the council to avoid residential care costs and recover the investment, once the property is sold or transferred. (Ref Private Sector Housing Assistance Policy section no 7.13)

- To increase the means test allowance to savings levels for couples to £20k and individual to £15k. (Ref Private Sector Housing Assistance Policy section no 7.11)
- Some clients are unable to afford their means tested contribution, to their Home Investment Loan, therefore it is proposed that the Council include their contribution as a lifetime charge to be repaid on sale or transfer of the property. An example would be for essential work i.e. provision of safe electrical installation, roof repairs, and damp work. This is subject to consideration by and decision of the Private Sector Adaptations Panel, they are responsible for reporting in to and making recommendations for consideration by the Director of Housing Assessments & Solutions.
- Allow previous Loan applicants to access a further loan up to the new maximum of £30k for new and unrelated work. (Ref Private Sector Housing Assistance Policy section no 6.11)
- **Home Repair Loan** – increase savings level to £6k. (Ref Private Sector Housing Assistance Policy section no 11.2)

- Increase the Home Repair Loan limit from £3k to £4k (Ref Private Sector Housing Assistance Policy section no 11.4)
Include annual service costs of equipment once out of warranty, i.e. stair lifts, hoists etc
- Removal of assistance to tenants or landlords to apply for **energy loans**, as this is felt to be the responsibility of the landlord under the terms of their tenancy agreement.
Private and Housing Association Tenants are still eligible to apply for Disabled Facilities Grants with the Landlords, or Housing Associations' permission.

4. CONSULTATION

4.1 Consultation on the new policy has taken place as follows:

CASSUP Disability forum meeting
Services Users- officers have discussed the proposed changes directly with existing and new applicants and have received positive feedback.
With key staff in Adults Social Care, Community Occupational Therapy Services.
With the Children's Occupational Therapy Service.

5 PRE-DECISION SCRUTINY

5.1 There was no pre-decision scrutiny of the proposals within this report.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

6.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2021/22 £'000	2022/23 £'000	2024/25 £'000	2025/26 £'000
Revenue Budget available				
Expenditure				
Income				
Effect of decision from report				
Expenditure				
Income				
Remaining budget	_____	_____	_____	_____
Capital Budget available				
Expenditure	3,490	3,500		

Loan funding	230	230		
Effect of decision from report				
Expenditure	3,720	3,730		
Remaining budget	<u>0</u>	<u>0</u>	<u> </u>	<u> </u>

6.2 The effect of the decision

6.2.1 The proposed programme for 2021/22 is £3.2709 million including £0.59m from recently confirmed additional DFG grant. This plan consists of £2.99 million to be paid out in disabled facilities grants (from MHCLG) and £072 million for Private Sector Renewal loans/grants including Empty Property Loans, all funded by borrowing or by recovered grants/loans (i.e. reimbursements from private sector individuals due to early sales of their properties)

6.2.2 The following chart is a breakdown of spend over the last 3 years. The proposed changes to the policy are to enable more people to remain living independently in their own homes. It is estimated that by implementing these changes will result in the Council having to spend less money on providing care packages or expensive long term residential care.

6.2.3 For example a repayable loan of up to £30k to upgrade electrical wiring, renew roof, windows, damp proofing work, or £30k to provide a disabled adaptation for a level access shower, ramp, stair lift, hoist etc. can be compared to the cost of residential care to the council of £30-£40k per annum.

6.2.4 Therefore by ‘invest to save’, would enable the council to avoid expensive residential care costs, and recover the investment and recycle the money once the property is sold or transferred.

Breakdown of spend across programme 2018-19 to 2021-22 (forecast)

	2018/2019	2019/2020	2020/2021	2021/2022 (Forecast)
DISABLED FACILITIES GRANT				
Total spend	£1,881,487.22	£1,981,941.15	£2,037,921.20	£2,400,000.00
Grants completed	131	142	159	165
Average cost of completed assistance	£11,669.19	£13,106.06	£11,373.12	£12,000
Grant monies recovered/repaid	£64,509.97	£71,325.01	£108,857.12	N/A
HOME INVESTMENT LOANS				
Total spend	£338,605.50	£336,599.78	£230,295.54	N/A
Loans completed	25	24	25	N/A
Average cost of completed assistance	£13,251.56	£10,577.00	£13,502.67	N/A
Loan monies recovered/repaid	£70,518.25	£218,377.63	£178,683.04	N/A
HOME REPAIR LOANS				
Total spend	£9,335.29	£7,381.50	£3,447.12	N/A
Loans completed	3	3	2	N/A
Average cost of completed assistance	£1,913.61	£2,259.38	£2,047.56	N/A
Loan monies recovered/repaid	£6,836.02	£1,614.96	£2,156.08	N/A
CROYDON ENERGY LOANS				
Total spend	£85,215.94	£44,482.24	£26,997.10	N/A
Loans completed	17	13	8	N/A
Average cost of completed assistance	£3,062.17	£3,525.64	£3,760.14	N/A
Loan monies recovered/repaid	£14,004.00	£15,572.20	£8,737.80	N/A
EMPTY PROPERTY LOANS				
Total spend	£20,000.00	£30,000.00	£110,000.00	N/A
Loans completed	0	0	0	N/A
Average cost of completed assistance	0	0	0	N/A
Loan monies recovered/repaid	£0.00	£0.00	£40,095.84	N/A
EMPTY PROPERTY GRANT				
Total spend	£311,833.34	£535,000.00	£200,000.00	£500,000.00
Grants completed	18	26	5	20
Average cost of completed assistance	£24,643.33	£25,000.00	£25,000.00	£25,000.00
Grant monies recovered/repaid	N/A	N/A	N/A	N/A

6.2.5 The report and the revised Private Rented Sector Housing Assistance Policy detail nine mechanisms of support with objectives including: keeping residents

in their own homes (and out of residential care); increasing the supply of temporary accommodation available to LBC; alleviate risks to the health and safety of Croydon owner-occupiers and reduce fuel poverty amongst owner-occupiers in the borough.

6.2.6 The schemes are managed within the Housing Renewal team in the Housing Assessment and Solutions directorate.

6.2.7 The team and service is funded as follows:

Staff funding (revenue budget)

	£'000
Housing Renewal Team staffing cost	621
Private contractor fees	221
DFG recharge	-228
Administration fee income	-246
Recharges to other services	-358
Housing Renewal Team funding	-832
Net cost of service	10

6.2.8 Fees are recovered for the purposes detailed in the policy document, generally as **17%** of the project costs and are used to offset staffing costs.

DFG

6.2.9 The limit on administration of the Disabled Facilities Grant has historically been around capacity to assess and approve applications for amendments to properties. Part of the grant is used for staff costs within the guidelines for the use of the grant to ensure that lack of staffing does not limit the number of interventions that can be progressed. Additionally, where repayments of the grant are received these amounts are not ringfenced back to the DFG allocation but are recognised as income back to the general fund. The introduction of a new Discretionary Disabled Facilities Grant and a Simple Adaptations Grant and the adjustment of the limits on expenditure should enable increased use of the grant in order to alleviate pressure on budgets elsewhere in the organisation.

Home Improvement Loans, Home Repair Loans and Energy Loans

6.2.10 These loans are offered as interest free long term loans on a long term basis, secured by a charge on the altered property. The type of support offered by these loans evolved from the offer of grants for similar purposes and due to the mechanism of recovery via the legal charge there is limited risk of losses over the long-term. No interest is charged largely because the value in keeping residents out of costly supported accommodation outweighs the amount of interest that would be recovered, particularly at interest rates seen over the past 10 years.

6.2.11 The cohort eligible for these grants would likely be heavily deterred by an interest charge in any format and could therefore reduce take-up to the point of

nullifying the scheme. Any interest charge on a secured long-term loan would need to be at a variable rate linked to Bank of England base rates and with consideration to the rate at which Croydon are borrowing to fund the loans. Additional administration work would be required to issue annual or other periodic statements to borrowers detailing the outstanding loan amount.

Empty Property Loans

6.2.12 These loans are issued for 2 years at the Bank of England base rate + 1% as the targeted cohort are landlords seeking to bring empty properties back into use and will be financially benefitting from the completion of works

Special Projects Loan

6.2.13 These loans are tailored to each situation under consideration. It is recommended that interest charges are considered in assessing the project and are charged unless there are offsetting benefits to issuing the loan, such as securing nomination rights over the property or properties being renovated.

6.3 Risks

Funding for housing renewal will have to compete with all the other demands on the Council's capital programme, but by investing in maintaining properties enables our residents in the private sector to remain living independently, and therefore negates the high cost of residential care, Temporary Accommodation and the pressure on Social Care budgets.

There will still be a specific capital grant for disabled facilities grants. Example: If the resident cannot afford to adapt their property to meet the needs of the person with disabilities, their only solution may mean turning to the council for assistance with long term residential care, or Temporary Accommodation.

6.4 Options

The programme funds a range of different grants to tackle disrepairs, improve energy efficiency and deliver adaptations in the private sector. The council has sought to maximize resources in this area through a range of funding in specific capital grant. The option of charging interest on more of the loans has been considered but is not favoured as take up of the loans would likely drop substantially.

6.5 Future savings/efficiencies

The programme has the overall aim of avoiding costs for Adult Social Care services and Homelessness services by keeping residents within their own homes.

Recycling the loan fund and registering a charge with HM Land Registry will ensure that whenever a property is sold or disposed of, the money will be returned to the central pot. It can then be recycled to secure improvements/repairs in further properties.

All Home investment loans and grants have conditions attached. If there is a breach of these conditions, such as the sale of the property, within the stated period the monies can be reclaimed. All completed loans and grants are closely monitored through local land charges and land registry and the recovery of the

home improvement loan or grant is rigorously pursued. Approximately £0.3 million is currently recovered and recycled annually back into the programme.

Approved by: Sarah Attwood Interim Head of Finance for Housing

7. LEGAL CONSIDERATIONS

- 7.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that Regulatory Reform (Housing Assistance) (England and Wales) Order 2002/1860 (“The Order”) provides authority to local housing authorities to provide assistance, for the purpose of improving living conditions in their area, to any person for the purpose of enabling that person
- (a) to acquire living accommodation (whether within or outside their area);
 - (b) to adapt or improve living accommodation (whether by alteration, conversion or enlargement, by the installation of any thing or injection of any substance, or otherwise);
 - (c) to repair living accommodation;
 - (d) to demolish buildings comprising or including living accommodation;
 - (e) where buildings comprising or including living accommodation have been demolished, to construct buildings that comprise or include replacement living accommodation.
- 7.2 The power conferred in paragraph 7.1(a) above may be exercised to assist a person to acquire living accommodation only where the authority—
- (a) have acquired or propose to acquire (whether compulsorily or otherwise) his existing living accommodation; or
 - (b) are satisfied that the acquisition of other living accommodation would provide for that person a benefit similar to that which would be provided by the carrying out of work of any description in relation to his existing living accommodation.
- 7.3 The Assistance may be provided in any form and may be unconditional or subject to conditions, including conditions as to the repayment of the assistance or of its value (in whole or in part), or the making of a contribution towards the assisted work; but before imposing any such condition, or taking steps to enforce it, a local housing authority shall have regard to the ability of the person concerned to make that repayment or contribution.
- 7.4 Before a local housing authority provide assistance to any person, they shall—
- (a) give to that person a statement in writing of the conditions (if any) to which the assistance is to be subject; and
 - (b) satisfy themselves that that person has received appropriate advice or information about the extent and nature of any obligation (whether financial or otherwise) to which he will become subject in consequence of the provision of assistance.
- 7.5 A local housing authority may take any form of security in respect of the whole or part of any assistance. Where any such security is taken in the form of a charge on any property, the local housing authority may at any time reduce the priority of the charge or secure its removal.

- 7.6 A local housing authority may not exercise the above referenced powers in any case unless—
- (a) they have adopted a policy for the provision of assistance under that article;
 - (b) they have given public notice of the adoption of the policy;
 - (c) they have secured that—
 - (i) a document in which the policy is set out in full is available for inspection, free of charge, at their principal office at all reasonable times; and
 - (ii) copies of a document containing a summary of the policy may be obtained by post (on payment, where a reasonable charge is made, of the amount of the charge); and
 - (d) the power is exercised in that case in accordance with that policy.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

8. HUMAN RESOURCES IMPACT

- 8.1 There are no impacts to staffing levels, restructuring/regrading, recruitment, employee relations, the Council's personnel policies or other human resources matter.

Approved by: Sue Moorman, Director of Human Resources

9. EQUALITIES IMPACT

- 9.1 In April 2011 the Equality Act (2010) introduced the public sector duty which extends the protected characteristics covered by the public sector equality duty to include age, sexual orientation, pregnancy and maternity and religion or belief.
- 9.2 See attached EIA appendix B.

Approved by: Yvonne Okiyo, Equalities Manager

10. ENVIRONMENTAL IMPACT

- 10.1 Use of natural resources (e.g. durability of products and materials, products made with recycled materials to offset raw material use, use of sustainable timber etc.) Wherever possible contractors carry out grant/loan works will be encouraged to use materials from sustainable resources and to reuse and recycle building materials.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 Section 17 of the Crime and Disorder Act 1998 says that without prejudice to any other obligation imposed on it, it shall be the duty of the Council to exercise its various functions with due regard to the likely effect of the exercise of those

functions, and the need to do all that it reasonably can to prevent crime and disorder in its area.

- 11.2 By Section 6 of the same Act the Council and its partners are required to formulate and implement a strategy for the reduction of crime and disorder in the area.
- 11.3 Therefore there are two duties. The first is to formulate and implement a crime reduction strategy. This is about crime which already exists. The second is crime and disorder prevention. Every function shall be exercised to prevent crime and disorder.
- 11.4 **Empty Homes Grant** are available to bring empty properties back into use. The provision of home investment loans helps to bring run down homes back to standard. These measures help to improve the general appearance of an area and to deter criminal activity.
- 11.5 **The Staying Put Garden** scheme provides a gardening service for older and disabled people. Tidy gardens help to reduce the likelihood of these homes being targeted by bogus callers or burglars.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 That committee notes and agrees to approve the proposed changes to the current Private Sector Housing Assistance Policy 2021.

13. OPTIONS CONSIDERED AND REJECTED

- 13.1 Croydon has had a Housing Assistance Policy for many years detailing the types of assistance available. The previous policy, approved in 2014, has been reviewed and the new draft policy sets out how Croydon proposes to use the various powers available, including the provision of financial assistance in the future.
- 13.2 The Policy ensures that a range of options are provided to Croydon's residents to access assistance to repair, improve and adapt their properties to enable them to live safely and independently in their own homes.

14. DATA PROTECTION IMPLICATIONS

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

No DPIA required

Approved by: Yvonne Murray, Director of Housing Assessment & Solutions

CONTACT OFFICER:

Lesley Roman, Staying Put Operations
Manager, 07935 517043.

APPENDICES TO THIS REPORT

Appendix A: Croydon Private Sector Housing Assistance Policy 2021

Appendix B: Equalities Impact Assessment

BACKGROUND PAPERS:

None