

Vibrant and Sustainable City Scrutiny Panel

26 April 2018

Report title	Private Sector Housing Update	
Cabinet member with lead responsibility	Councillor Peter Bilson City Assets and Housing	
Wards affected	All	
Accountable director	Kate Martin, Service Director Housing	
Originating service	City Housing	
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Report has been considered by	Place Leadership Team	9 April 2018

Recommendations:

The Scrutiny Board is asked to consider:

1. An update on the Private Sector Housing service including the development of a Private Sector Housing and Health Strategy.
2. The progress made following recommendations made by the Vibrant and Sustainable City Scrutiny Panel on 29 June 2017.

1.0 Purpose

- 1.1 To give an overview of the current function of the Private Sector Housing service and proposals for the development of a strategy which will be in line with local and national priorities.
- 1.2 To update the Scrutiny Panel on progress made following recommendations by the Vibrant and Sustainable City Scrutiny Panel on 29 June 2017.

2.0 Background

- 2.1 Between 2001 and 2011 the population of Wolverhampton rose by 5.5% and continues to grow. In this time the number of private renters nearly doubled from 7,000 to 13,500. The Census of 2011 showed that the Housing market in Wolverhampton was made up of the following statistics:

Owner Occupier	56%
Council Rented	22.3%
Social Landlord	5.7%
Private Rented Sector	13.2%

- 2.2 Within the last 5 years, however, the Private Rented Sector (PRS) has gone through a period of prolific growth. With many existing and new investors choosing Wolverhampton as a place to capitalise in. It is predicted that the extensive growth of the Private Rented Sector (PRS) will lead to it taking over Council and Social housing by 2020.
- 2.3 This rise in the PRS will bring with it great benefits for the economy of Wolverhampton; with better choice and improvement for our customers; however, this growth will also bring with it challenges and opportunities for the more unscrupulous landlords to exploit such growth, by providing poor housing and targeting the most vulnerable people who are limited in the choices they can make.

3.0 Private Sector Housing Service

- 3.1 The size and complexities of the private rented sector in Wolverhampton, has meant that the service provided by the Council has been predominantly reactive in nature. However, with the growth of the market, the increasingly dangerous conditions found by officers in privately rented properties, the increasing vulnerabilities of people residing within the private rented sector of the City, a more proactive, targeted and strategic approach is necessary to target issues head on.
- 3.2 Despite central government empowering local authorities with more tools to penalise the very worst landlords and providing further powers to licence an even bigger portion of houses in multiple occupation within the City, it is imperative that the use of these tools and powers yields the desired outcome of a better and safer market and not merely an additional administrative burden on the service.

3.3 The Homeless Reduction Bill requires local authorities to discharge more of our duties into the private sector; however, without proper intervention, we could be at risk of sending some of our most vulnerable clients into properties owned and managed by some of our most unscrupulous landlords.

4.0 Private Sector Housing and Health Strategy

4.1 It is proposed that a new strategy is developed, tested and implemented over the next 12 months. It is proposed that this will involve the following steps:

4.2 Evaluation of the Existing Service

4.3 A full review will be carried out of the service as it is currently being delivered. This will include an evaluation of the delivery of our statutory functions as well as national, regional and local priorities. This will be broken down into the following principal areas of work:

4.4 Requests for Service

4.5 Private Sector Housing receives approximately 550 requests for service each year. These are from tenants living in private rented properties in need of our assistance, as well as referrals from other agencies such as the Police and Fire Services.

4.6 Until now it was believed that these were the most vulnerable members of the private rented market and the service was targeting our time and resources into this area.

4.7 However, following proactive checks on properties as part of multi agency operations such as with colleagues from the United Kingdom Visa and Immigration; these properties were found to be in poor condition. However due to the vulnerable nature and status of this particular cohort of residents they were unable to complain to our service and draw attention to themselves. These circumstances lend themselves for unscrupulous landlords to exploit such people and keep them in some of the worse conditions, safe in the knowledge that there will be no recourse.

4.8 Another such area of concern is that of the migrant population within the PRS; who again due to language barriers or simply not knowing their rights or where to go to get help can be easily exploited by unscrupulous landlords. This cohort are also at particular risk of issues such as modern-day slavery.

4.9 With regard to the residents who do access our services; the following areas will be reviewed:

- Number of complaints that result in action being taken.
- Complaints that can be dealt with by advice only.
- Inappropriate use of the service, i.e. for personal injury claims, retaliatory complaints or in pursuance of a Council house.
- Number of category 1 hazards remedied by the involvement of the service.
- Level of landlord engagement and sign up to Rent with Confidence.

- Number of legal notices served.
- Number of prosecutions.
- Income generated from fees and fines.
- Annual cost of running the service as it stands.

4.10 Houses in Multiple Occupation (HMO)

- 4.11 The definition of a HMO in the Housing Act 2004 is a house or flat containing 3 or more people forming 2 or more households.
- 4.12 The larger, higher risk HMOs require a mandatory licence to operate.
- 4.13 The definition of a licensable HMO is where there are 5 or more unrelated occupants, in a property comprised of 3 or more storeys with some sharing of amenities (kitchens, bathrooms).
- 4.14 Currently there are 123 licensed HMOs in the City.
- 4.15 HMOs are more at risk of fire than any other dwelling type. Furthermore, overcrowding is also most prevalent in HMOs.
- 4.16 Due to the solitary nature of individual occupancy within a HMO; these properties are further regulated under the Housing Act 2004.
- 4.17 The following areas of review will be carried out:
- To understand what the government set out to achieve by the licensing of HMOs and if we have fulfilled that thus far.
 - If we have improved property conditions, in particular fire precautions in our licensed HMO's.
 - If we have been able to check on the compliance of licence conditions.
 - If any of our requests for service originate from our licensed HMOs.
 - If we are able to ascertain how many landlords have evaded licensing to date.
 - If we have been able to start on any proactive work to find properties of a poor standard or landlords operating in an illegal manner.
 - If we have been targeting the right group i.e., high risk property, high risk occupant, worst landlords.
 - A review will be carried out of how much the licensing regime has cost the Council to date and if we have been able to recover these costs.
 - Information will be gathered on numbers of fires, accidents that resulted in hospital admissions or deaths from our licensed HMOs.
 - Consultation will be carried out public health, fire service, homeless services and other agencies, internal and external to see where partnership working could achieve more.

4.18 Extension to Mandatory HMO Licensing

- 4.19 In December 2017 the government announced an extension to the mandatory licensing scheme of HMOs.
- 4.20 From 1st of October 2018 all HMOs containing 5 or more unrelated people who are sharing amenities, will require a licence. The requirement for 3 or more storeys has been removed.
- 4.21 It is believed that an additional 500 properties will meet this definition.
- 4.22 The following reviews will be undertaken:
- Based on previous compliance history and numbers of landlords known to us through the Rent with Confidence scheme, we will estimate how many we believe will proactively come forward to apply for a licence.
 - Resource requirements will be estimated based on these initial figures.
 - Similar to the initial requirements of mandatory licensing, we will set out how we will ensure property standards and conditions will be improved as part of the new licensing regime.
 - It is anticipated that landlords will change occupancy numbers in order to evade licensing. This factor will be taken into account when determining inspection criteria and courses of action.
 - Cost and recovery of the new licensing regime will be forecasted.
 - We will align our service and advice with planning and article 4 direction, including the setting up of a working group and the formulation of a policy document as requested by members at the last Planning Committee meeting, to ensure we are giving a one Council approach to prospective landlords of HMOs.

4.23 Empty Properties

- 4.24 There is a great emphasis on local authorities working to bring empty properties back into use. Not least due to the shortage of housing but also when left unattended, properties can become a blight on neighbourhoods.
- 4.25 There is an average of around 1,300 properties empty over 6 months at any one time in the City (council tax base return definition). There are a further 350 properties empty over 6 months that are exempt from council tax. These exemptions mainly relate to properties where probate has not been granted or where an owner is in care/ being cared for elsewhere.
- 4.26 The empty property team have a long-standing target of bringing 200 properties back into use following interactions with owners. Interventions range from simple advice and encouragement to enforcement action such as compulsory purchase.
- 4.27 Action taken to reduce empty properties is both reactive (where a property is reported) and proactive (where empty property owners are contacted directly). Around a third of the properties brought back into use are reactive cases with two thirds arising from reactive interventions. The target has been exceeded in the last two years through a

close working relationship with revenues and benefits and the introduction of an incentive for empty property owners to make contact.

4.28 The reasons that properties remain empty for long periods are complex and intelligence gained through increased interaction with owners informs the strategy to minimise the number of long-term empty properties in the City. The following combination of policy, interventions and incentives will minimise long term empty properties:

- The target to bring 200 empty properties back into use each year drives both reactive and proactive efforts and innovations to minimise the number of empty properties in the city.
- Continued work with Revenues and Benefits to ensure that records relating to empty properties are as accurate as possible.
- A premium of 50% council tax is currently applied to properties empty over two years in the City. Discretionary powers will be available from April 2019 to increase the premium to 100%. This option is likely to form part of wider budget consultations in 2018.
- The incentive pilot scheme during 2017/ 2018 financial year has generated an increased level of engagement with empty property owners at a relatively modest cost to the Council. Cabinet have approved the continuation of the pilot in 2018/ 2019.
- Incentives aimed at maximising the use of long term empty properties are currently being considered based on feedback from owners. A scheme aimed at assisting first-time buyers interested in purchasing a long term empty property will be the subject of a further report if considered viable.
- An identified group of owners with empty properties are the elderly who are in hospital or care. An incentive will be devised to help them bring their property back into use, thus helping them with their care costs. This will also be the subject of a further report if considered viable.

4.29 Bringing empty properties back into use attracts New Homes Bonus to the City Council and results in additional council tax revenue. The costs of both reactive and proactive interventions can be offset against both increased income and reduced costs to the public purse by both the council and other public services such as the police and fire service. Having a safe and affordable home is likely to improve the health and wellbeing of the occupants and have wider benefits to the general location.

4.30 Fuel Poverty

4.31 Until recently, the usual definition of fuel poverty was that a household was considered to be in fuel poverty when it needed to spend more than 10% of its income on fuel – or energy as it is often called.

However, in June 2013, the [Department for Energy and Climate Change \(DECC\)](#)* published 'A framework for future action' which set out the Government's intention to adopt a new definition of fuel poverty for England.

This new definition states that a household is said to be in fuel poverty if:

- They have required fuel costs that are above average (the national median level), and

- Were they to spend that amount they would be left with a residual income below the official poverty line.

This also uses a fuel poverty gap - i.e. the difference between a household's 'modelled' (average) bill and what their bill would need to be for them to no longer be fuel poor.

4.32 The key factors that can contribute to fuel poverty are:

- The energy efficiency of the property (and therefore, the energy required to heat and power the home)
- The cost of energy
- Household income

4.33 The number of households experiencing fuel poverty is rising at the moment for several reasons:

- The cost of energy keeps increasing, which means we need to spend more of our income on paying these bills
- Many of us live in draughty homes, from which lots of heat escapes, and rely on heating systems that are old and inefficient. And because we do not have much money to spare, it is difficult to make our homes more energy efficient, which would reduce our bills
- The general cost of living is rising and this is also putting pressure on our finances so we have less money to go around.

4.34 It is believed that one in five households renting from a private landlord are in fuel poverty.

4.35 The figures from the Department for Business, Energy and Industrial Strategy show the West Midlands is the worst affected.

4.36 Private Sector Housing provide affordable warmth grants to vulnerable owner occupiers and have recently received Cabinet approval to extend this to private renters.

4.37 The delivery of these grants has moved to Wolverhampton Homes from October 2017.

4.38 The service ensures that every privately rented property it deals with has an Energy Performance Certificate as required by law.

4.39 From 2016, through the Rent with Confidence scheme, we further incentivise landlords by requiring them to have an EPC rating of E and above in order to become a 5 star landlord.

4.40 In April 2018 it will become a legal requirement, prior to the commencement of all new tenancies in privately rented properties to have an energy performance rating of E and above.

4.41 As part of our ongoing work to reduce fuel poverty within the City; in 2017 the Building Research Establishment (BRE) were commissioned to carry out two studies in

Wolverhampton. One was a stock modelling study, showing numbers of private rented properties and what kinds of hazards they contained by ward. The second report was on health impact assessments of those hazards identified in the stock modelling report.

- 4.42 The Council's Corporate Landlord is procuring a "white label" energy which will provide access to sustainably low energy tariffs for the inhabitants of Wolverhampton. This will assist in the reduction of fuel poverty in the City.
- 4.43 The work done to date will form the basis of the review; including the following:
- Stats from the BRE report show concentrated areas containing excess cold hazards
 - From April 2018 it will be illegal to commence new tenancies where a property has an EPC rating of E and below
 - For us to educate landlords proactively.
 - To proactively find landlords who knowingly rent energy inefficient properties and take action against them.
 - To ensure we promote and provide our affordable warmth grants to the most vulnerable people.
 - To work collaboratively with public health; based on the health impact work around hazards in properties.

4.44 Rent with Confidence (RwC)

4.45 Rent with Confidence is a star rating scheme for privately rented properties, landlords and agents. The star rating system is an uncomplicated way for landlords, agents and tenants to understand the quality of property and management service being provided. It works to educate and incentivise landlords to comply with the law. To date nearly 1700 properties belonging to 700 landlords/agents have registered on the scheme. It is timely to carry out a review of the service:

- To determine if we have improved conditions in those properties.
- If the scheme has been successful in incentivising landlords to join and thus improve their properties.
- To find other incentives for landlords to join the scheme.
- To determine if the scheme been appealing enough to disincentive bad landlords.
- To determine if tenants are using the star ratings to make better choices when looking for potential properties.

4.46 Proactive Priorities

4.47 Once a review of the service as it stands is carried out. A more targeted and proactive approach will be considered. Areas of intervention will be determined using the following key principles:

- Areas with the worst property conditions.
- Properties with the highest concentrations of category 1 hazards.
- Target properties by area, type and/or age.

- To determine where we can make small interventions with a big impact.
- To determine where we can make big interventions with a big sustainable impact.
- Review of selective licensing area/lessons learnt.
- To find properties containing the most expensive/dangerous hazards to the NHS.
- Where we can we make preventative interventions with public health on a spend to save basis to reduce curative cost.

4.48 Homeless Services

4.49 The Private Sector Housing service is working closely with homeless services/housing options to provide landlords and tenants with a holistic housing offer approach dealing with property standards and tenancy issues. The review will include the following:

- Determining the main reasons for the service of a section 21 (notice served by landlord to tenant requiring possession of property) notice.
- Determining who are most at risk of homelessness.
- To determine what proactive work can be done to sustain tenancies.
- Work with homeless services on preventative opposed to spend on fulfilling duty.

4.50 Analysis will be done of areas within the City to see where the worst housing conditions exist and where the most vulnerable clients reside. Data will be analysed from our internal records derived from our requests for service over the past 5 years, the information provided in the reports by the Building Research Establishment on stock modelling and health impact assessments within the PRS of Wolverhampton. A working group within City Housing as well as affiliated departments will be set up to understand what the wider needs of the Council are and how we can build them into our strategy. Peer reviews will be carried out with other local authorities both regionally and nationally to share and understand best practise. Consultation with cabinet members will also be carried out to understand priorities and ensure the work being proposed will be in line with the wider objectives of the Council. Landlord and tenant groups will be asked to comment on their priorities.

4.51 This consultation period is envisaged to take 3 months.

4.52 Following this period and taking into account all knowledge obtained from this consultation period, proposals will be made as to how the service will function. What changes will be proposed and why. This may result in changes of priorities for the service, but our statutory function will always be met.

4.53 The endeavour will be to proactively target the worst areas, housing the most vulnerable clients, in control of the most unscrupulous landlords. With priority being given to HMOs.

5.0 Housing and Health

- 5.1 The new strategic approach will move away from housing working in isolation to health, but more towards the amalgamation of housing and health. It is widely known that one of the key priorities nationally is housing and health.
- 5.2 Poor housing can lead to poor health and exacerbate existing health conditions. A warm, dry and secure home is associated with better health. The Building Research Establishment (BRE) in 2015 suggested that the cost to the NHS of poor housing in England was £2billion per annum (based on first year treatment costs only): an increase from the previous (2010) estimate of £600million. The English Housing Survey has identified a higher prevalence of poor housing in the private rented sector (PRS) compared to other tenures.
- 5.3 Collaborative work with colleagues from Public Health has already begun through our rent with confidence programme. In a spend to save bid, public health are currently working to quantify the cost of a category 1 hazard on the NHS. This has been further compounded by the health impact assessment work done in the BRE report. Jointly funded projects will look to remedy category 1 hazards that cost the NHS the most.
- 5.4 Consultation will be sought in conjunction with the Council's equalities and diversity team to ensure all cohorts of the City are consulted and their priorities are considered within our new strategic approach. This will include attending various groups and forums where private sector residents will be present. Similarly, landlord groups, charitable organisations and other public-sector bodies such as the police and fire service will be consulted.
- 5.5 Following this period of review and consultation a new method of working will be implemented. Teams will change within the service. Broadly being split into three teams of Education and Engagement (Rent with Confidence team), HMOs and licensing team and a specialist enforcement team will be introduced to target the very worst landlords.
- 5.6 In continuance with the excellent work done so far with public health on the rent with confidence project, further landlord engagement will be proactively done.
- 5.7 The aim therefore will be that every inspection or intervention made will result in a holistic approach of improving housing conditions, whilst ensuring tenants are given the right level of care and support within their homes and ensuring longevity of their tenancy. Landlords will be provided with the same level of support to ensure they can run their businesses legally, morally and profitably.

6.0 House of Commons Select Committee Review on Private Sector Housing

- 6.1 A national review of private sector housing commenced in January 2018 by the Housing, Communities and Local Government Select Committee. Some of the main areas of review to date were highlighted as:
- 6.2 New powers given to local authorities such as civil penalties up to £30,000 per offence. The private sector housing service in Wolverhampton has obtained cabinet approval for

the issuing of civil penalties within the revised enforcement policy. Prior to the commencement of issuing of such penalties and due to the high levels of fines involved, work with legal services and the corporate communications team is underway to ensure these powers are used properly and that landlords have been communicated with adequately.

- 6.3 The introduction of banning orders and a national rogue landlord database was also discussed. These tools will be utilised fully under the new strategy to tackle some of our very worst landlords.
- 6.4 The select committee also discussed the extension of the mandatory licensing of houses in multiple occupation. From 1st October 2018 all properties with 5 or more unrelated occupants, who are sharing amenities will require a licence. It is envisaged that this will affect approximately 500 additional properties in Wolverhampton. The strategy will aim to deliver reactive and proactive workplans for how to tackle this regime; including additional resource implications.
- 6.5 It was highlighted that government are not happy that housing benefit and the local housing allowance could perversely be encouraging landlords to subdivide properties. This is something we are aware of in Wolverhampton and are working to tackle this issue with our amenity standards, through which we are able to stipulate minimum room sizes and numbers of facility provisions based on numbers of occupants. This work will be further underpinned with the extension to mandatory licensing as well the article 4 direction requiring planning permission to be sought for the conversion of properties into small HMOs. It is accepted that there will always be landlords operating 'under ground' for which the strategy will scope out proactive measures to target landlords and areas.
- 6.6 Another area of review was the controlling migration funding available to local authorities to help with the impact of migration on the private rented sector. The City of Wolverhampton Council were within the first set of local authorities to bid for and successfully be awarded funding of £400,000. This funding will be used in conjunction with the refugee migrant centre in Wolverhampton, to provide tenancy training and support to people within the private rented sector from migrant communities who are less likely to know of their legal rights and thus at risk of exploitation by unscrupulous landlords.
- 6.7 Another key area of review was that of protection from retaliatory, revenge or illegal evictions. The controlling migration funding identified in 6.6 of this report will also be used for the recruitment of an illegal eviction and harassment officer. They will work across agencies between the refugee migrant centre, rent with confidence and the enforcement team of the private sector housing service, to educate tenants and landlords of what illegal eviction and harassment are, but also to prosecute landlords to operate these practises.

7.0 Vibrant and Sustainable City Scrutiny Panel

- 7.1 A review was carried out by the Vibrant and Sustainable City Scrutiny Panel on 29 June 2017 of the Private Sector Housing Service. Evidence was heard by a number of agencies including local landlords, letting and managing agents and various other charitable organisations who deal with homeless and vulnerable clientele. The Scrutiny Panel asked a series of questions of the attendees as to the current status of the private rented market; their experiences and concerns and how we could improve our services to help and facilitate the positive growth of the sector.
- 7.2 Three recommendations were set by the panel which are detailed below with an update on what actions have been taken based on each recommendation:
- 7.3 **Recommendation 1: (A) the Rent with Confidence Scheme through the introduction of an enhanced rent guarantee scheme, including covering rent in advance, and/or off-setting rent loss as well as training, support and vetting processes for landlords and tenants, to be drawn up in conjunction with the Private Sector Housing Forum referred to in Recommendation (B) below;**
- 7.4 Increased elements to the landlord's incentives were introduced in October 2017 with the introduction of pilot offer of rent in advance and cash deposits.

Deposit	Family Size	Average Case Cost *	Saving
£650	4	£2500	1850
£520	3	£2500	1980
£600	4	£2500	1900
£590	4	£2500	1910
£630	5	£2500	1870
£500	1	£2500	£2000
£500	1	£2500	£2000
£500	1	£2500	£2000
£500	1	£2500	£2000
£500	1	£2500	£2000
£650	3	£2500	£1850
£700	4	£2500	£1800
£550	2	£2500	£1950
Total			£25,110

*figure from crisis cost of homelessness analysis

- 7.5 With each homeless application costing in the region of £2500, savings of over £9500 to the local authority were achieved, via using greater incentives like cash deposits. From 1 December 2017 the rent deposit scheme and budgets are managed by Wolverhampton Homes so any additional incentives can be offered via the new housing options service on a case by case basis.

- 7.6 Recommendation 2: (B) engagement with the sector to include the setting up of a Private Sector Housing Forum, to comprise of councillor representatives, estate agents, landlords, tenants, client side representatives and community/charity groups such as Citizens Advice with the aim of the Forum to improve standards in the private rented housing sector;**
- 7.7 A Private Sector Housing Forum was set up following Scrutiny. To date two well attended and successful events have been held, on the 7th of December 2017 and then the 15th of March 2018; chaired by Councillor Peter Bilson and attended by officers from private sector housing, including rent with confidence officers, benefits and revenues, homeless services and the private sector leasing scheme from Wolverhampton Homes.
- 7.8 A variety of landlords have been in attendance including those already signed up to the rent with confidence scheme, as well as those who are not, with varying portfolios of properties. Some letting agents also attend.
- 7.9 This initiative has proved an excellent way to communicate with landlords. At the last meeting landlords were updated with the new changes in law and consulted about the new private sector housing and health strategy.
- 7.10 Landlords and agents are taking the opportunity to raise their concerns as well as share best practise with officers and each other.
- 7.11 Meetings are held quarterly.
- 7.12 Recommendation 3: (C) publicity of the Rent with Confidence Scheme to include a communications and marketing process and plan that enhances the scheme in a way that covers all parts of the city, to be drawn up in conjunction with the Private Sector Housing Forum referred to in Recommendation (B).**
- 7.13 The rent with confidence team are working with corporate communications to develop a plan and maximise the opportunities that exist from using existing channels and technology.
- 7.14 We have been advised by communications to utilise the 50,000-strong reach of Wolverhampton Today and 14,000-strong reach of @wolvescouncil.
- 7.15 We are working with communications to come up with a content planning schedule to promote the scheme and increase number of landlords who are aware and sign up.
- 7.16 We are working with communications to develop a targeted email approach to keep existing members of the RwC scheme informed and interested using gov delivery email marketing software. This is inexpensive to use, targeted and directly measurable in terms of results. The plan is to provide content monthly on a specially branded RwC template. This also allows use of video and other integrated social media.
- 7.17 We are planning how to target city landlords currently unknown to the service – meeting with corporate communications to identify how to reach, current internal databases, other networks etc.

7.18 A full communication plan is appended to the report.

8.0 Questions for Scrutiny to consider

8.1 How often would the Vibrant and Sustainable City Scrutiny Panel like to be updated on the private sector housing service?

8.2 By what means would the Scrutiny Panel wish to be consulted on the new private sector housing and health strategy?

9.0 Financial implications

9.1 There is an existing budget of £40,000 for the rent bond guarantee scheme which has not been fully spent because the uptake has slowed down. The relaunch of the scheme in collaboration with Rent with Confidence and the Private Sector Housing Forum will provide a better offer from landlords and should ensure more effective use of the budget. If the budget is used to assist more families at risk of Homelessness this can prevent them becoming homeless and prevent the increased costs that will be incurred if they do become homeless.

9.2 There may be a need to increase the budget in the future in line with the increased emphasis on preventing homelessness. This could be funded from existing grant funding for homelessness. [JM/26032018/O]

10.0 Legal implications

10.1 Advice will need to be taken from the legal department as and when new projects are implemented, to make sure of the lawfulness of actions.

10.2 All proposed actions in this report are fully within the law and would make full use of City of Wolverhampton Council powers in this area, also making clear to members of the public that CWC is serious about enforcing against rogue landlords and supporting good quality housing.

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11.0 Equalities implications

11.1 Equalities implications for refugee and migrant communities are explored in sections 4.7 and 4.8 of this report. The proposed consultation will contribute towards a full Equalities Analysis of the Private Sector Housing and Health Strategy.

12.0 Environmental implications

12.1 There are no direct environmental implications as a result of actions being taken following recommendations from the Vibrant and Sustainable City Scrutiny Panel.

13.0 Human resources implications

13.1 There are no human resources implications at this stage.

14.0 Corporate landlord implications

14.1 Corporate landlord will notify the private sector housing service once the procurement process has been undertaken and if a suitable provider has been identified.

15.0 Schedule of background papers

- 15.1 Vibrant and Sustainable City Scrutiny Panel 29 June 2017 agenda and minutes:
<https://wolverhamptonintranet.moderngov.co.uk/ieListDocuments.aspx?CId=507&MId=7311&Ver=4>
- 15.2 Cabinet Meeting 18 October 2017 - Housing Enforcement and Charging Policy:
<https://wolverhamptonintranet.moderngov.co.uk/documents/s55687/Housing%20Enforcement%20and%20Charging%20Policy.pdf>