
PPP Private Sector Housing Policy

Committee considering report:	Joint Public Protection Committee
Date of Committee:	28 th September 2020
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1. Purpose of the Report

- 1.1 To provide the Joint Public Protection Committee with an update on the work of PPP within Private Sector Housing and to highlight the high level priorities which we will undertake over the next 2 years.

2. Recommendations

- 2.1 The Committee NOTES the role PPP role in relation to Private Sector Housing.
- 2.2 The Committee APPROVES the direction that PPP are taking in Private Sector Housing
- 2.3 The Committee APPROVES the issue of civil penalties notices as an additional tool to prosecution for relevant offences under the Housing Act 2004
- 2.4 The Committee DELEGATES to the Joint Management Board the development and sign off of an internal appeals process with respect to civil penalty notices.

3. Implications and Impact Assessment

Implication	Commentary
Financial:	<p>In order to ensure that the priorities are met PPP have recently recruited 3 additional officers to carry out housing work (one of these is an internal promotion); they will be starting with PPP within the next 1 - 2 months dependant on length of notice period.</p> <p>Penalties from the issue of Civil Penalty notices will come into PPP. This ensures that those who disregard the law contribute to its enforcement.</p>
Human Resource:	<p>As previously noted 3 officers (1 internal) have been appointed to the private sector housing function as this continues to develop as a priority for the Councils.</p>
Legal:	<p>One of the growth areas in the Policy is in enforcement in areas of non-compliance. This will have an implication on the Case Management Unit of PPP and on the legal teams in the LAs.</p>
Risk Management:	<p>Financial risk is managed elsewhere.</p>

	<p>To date we have recognised that, although we prioritised the work in housing, we did not have the staffing capacity to carry out the work. With the recent recruitment we hope to mitigate this risk. However, we also need to acknowledge that in pursuing these priorities there will be an increase in enforcement action, which will bring its own risks in terms of the staffing level needed both in Housing Officers but also in the Case Management Unit.</p> <p>JMB will be kept informed of any service changes and adjustments and any consequences arising from these will be notified.</p>			
Property:	There are no direct implications arising from these proposals.			
Policy:	The role of the Joint Committee includes consideration of reports relating to service delivery matters. This report addresses that requirement by setting out the approach to service recovery.			
	Positive	Neutral	Negative	Commentary
Equalities Impact:				
A Are there any aspects of the proposed decision, including how it is delivered or accessed, that could impact on inequality?	x			<p>This is not a decision report.</p> <p>The report does however set out the steps taken to protect the vulnerable and address community need.</p>
B Will the proposed decision have an impact upon the lives of people with protected characteristics, including employees and service users?	x			The Private Sector Housing Policy, by its nature, will have a positive effect on the vulnerable groups in society. By PPP targeting non-compliance in this sector we can improve living conditions and lives.
Environmental Impact:		x		
Health Impact:	x			<p>The proposals create no direct health impacts on staff.</p> <p>They do however set out community based health protection measures.</p>

ICT or Digital Services Impact:	x			With the current situation much more emphasis has been put on alternative methods of communication. The use of digital meetings and conferences will assist us in our communication work identified in this policy.
PPP Priorities :	x			The Policy is in line with the priorities of PPP and indeed it sets out the priorities for Private Sector Housing
Data Impact:		✓		None
Consultation and Engagement:	Meetings have been held with the LA Housing Leads for West Berks and Bracknell where we have been exploring joint working; communication has been had with Housing Lead in Wokingham. All 3 LA leads have been sighted on this policy.			

4. Summary

- 4.1 The Policy sets out the context of the PPP role in Private Sector Housing and where this fits with the PPP Vision and priorities.
- 4.2 The Policy gives a summary of the areas of work which PPP will priorities in the coming 2 years; and gives a direction on the approach of compliance is gained through enforcement as we are finding that an approach of communication and informal action is not working in a number of cases.
- 4.3 The Policy gives information on Civil Penalties. These can be used as an alternative to Prosecution. The maximum penalty is £30,000, the amount of penalty is to be determined by the local housing authority in each case. In PPP this will be based on the level of culpability, the level of harm (potential or actual), it will take account of aggravating factors and mitigating factors. The Service is currently considering options for an internal appeals process with respect to Civil Penalty Notices. It is proposed that the process be approved by Joint Management once finalised.
- 4.4 We recognise the important of ensuring that the priority of private sector housing is increased as this affects a large number of residents and businesses across the Boroughs. It is for this reason that we are developing a dedicated team of officers (and a recruitment drive for new officers) and a Lead Principal Officer in Housing; and is why we are ensuring that our Private Sector Housing Policy is updated and presented to JPPC.
- 4.5 In PPP we are committed to working with our partners in LA Housing and to that end we have started a series of liaison meetings which we hope will ensure leads to a more cohesive, efficient and effective housing service.

5. Appendices

- 5.6 Appendix A – PPP Private Sector Housing Policy 2020 - 2022