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Housing, Communities and Local Government Committee

Protecting rough sleepers and renters: Interim Report

First Report of Session 2019–21

Report, together with formal minutes relating to the report

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Housing, Communities and Local Government Committee

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Summary

Rough sleepers are some of the most vulnerable people in our society. Prolonged rough sleeping causes significant impacts on mental and physical wellbeing, as well as increasing a person's chances of being a victim of crime and violence. The streets are dangerous at the best of times, and we are far from those.

Renters are much more likely to suffer from the immediate economic impact of the coronavirus crisis, compared to homeowners. Less than half of rents are being collected on time. Around 1.7 million of 11 million private renters might be unemployed by the end of July.

This report sets out how these vulnerable groups can be protected against the impact of coronavirus. The Government must take the following six measures to protect rough sleepers and renters:

• Use this crisis to end rough sleeping in England once and for all.

The Government's taskforce must take advantage of this golden opportunity to ensure every single person taken from the streets does not return to rough sleeping. The Government must estimate the cost of a housing-led solution with appropriate wraparound support, likely to be at least £100m a year, and provide this as a dedicated funding stream to councils.

• We appeal on humanitarian grounds for the Government to improve its support to councils for people with no recourse to public funds during this crisis, or hundreds will return to the streets with potentially disastrous consequences.

We recommend that the Government should guarantee it will compensate councils for provision offered to rough sleepers with no recourse to public funds as a result of the current crisis. The Government needs to urgently publish guidance on councils' use of discretion in these circumstances and clarify what people can or cannot claim when they have no recourse to public funds.

• The Government must ensure that rough sleepers do not end up back on the streets due to a lack of suitable housing.

The Government needs to act to boost the immediate availability of appropriate supported housing, by providing targeted grant funding for councils and housing associations to acquire properties, using the National Clearing House Scheme from 2008 as a starting point. We also ask the Government to remove restrictions on Right to Buy receipts to provide councils with more flexibility.

 Unless the Government amends existing housing legislation, its plans to introduce a pre-action protocol to the private rented sector will be toothless and will fail to prevent a cliff edge of evictions once the moratorium on possession cases ends. Legislating to protect tenants from the minority of landlords lacking compassion does not invalidate the premise that most landlords behave in good faith; it protects those at the sharp edge of the crisis from facing homelessness. We recommend the Government amends the 1985 Housing Act to allow judges to use discretion under section 21 and mandatory ground 8 of section 8 where a tenant is in rent arrears due to the coronavirus crisis. The Government should introduce a short Bill as soon as possible, such as we have proposed in the Appendix.

• The Government must accelerate its plans to introduce the Renters' Reform Bill to Parliament and abolish 'no fault evictions' under section 21 of the Housing Act 1988 within the next 12 months.

The insecurity of tenants has been put into sharp relief by the coronavirus crisis, so it is important that the Government moves the Renters' Reform Bill up its legislative agenda.

• The Government must ensure that the Local Housing Allowance (LHA) rate is set at a level that reflects real market rents and ensures those in need are able to afford properties in their areas. We call on the Government to guarantee that the LHA rate will be maintained at the 30th percentile long-term. We also ask the Government to conduct work on what the impact on renters and the wider rental market would be of raising LHA rates further.

If it is the Government's intention to ensure tenants can pay rents by subsidising their income through the benefit system, it must be aware if shortfalls exist and take further action.

• The recommendations we make in this report require urgent consideration and action. We therefore ask the Government to respond to our recommendations by 12 June, rather than the usual two months.

By the usual time for a response—in July—the chance to implement our recommendations will have been lost.

1 Introduction

- 1. Rough sleepers are some of the most vulnerable people in our society. Prolonged rough sleeping causes significant impacts on mental and physical wellbeing, as well as increasing a person's chances of being a victim of crime and making them 17 times more likely to be a victim of violence, according to research by Crisis.¹ Women are especially vulnerable, as one in four are sexually assaulted while rough sleeping.² A recent study found that homeless people housed in London's hostels are 25 times more likely to die from coronavirus³ than the general adult population.⁴ This is against a backdrop of increased homelessness deaths: the Office for National Statistics found that 2018 saw the biggest annual increase of deaths, and that estimated deaths in England and Wales had increased by 51% between 2013 and 2018.⁵ The streets are dangerous at the best of times, and we are far from the.
- 2. For those fortunate enough to be in accommodation, housing is often their largest expenditure. The evidence so far suggests that, as a group, renters are much more likely to suffer from the immediate economic impact of the coronavirus crisis, compared to homeowners. On average, renters spend more than homeowners on housing;⁶ have less savings,⁷ are more likely to work in sectors directly affected by social distancing, are less likely to be able to work with schools closed, and are less likely to be able to work from home.⁸ The House of Commons Library estimates that around 43% of social renters and 37% of private renters are in relative poverty after housing costs.⁹ A plethora of studies have shown renters are struggling. Citizens Advice estimated that around 2.6 million private renters at the beginning of April had already missed a rent payment or expect to do so.¹⁰ Shelter predicted that 1.7 million renters may be unemployed by the end of July.¹¹ Figures on rent collection from April found that only 44% of residential rent was collected on time, whereas in 2019 the average was 79%.¹²
- 3. We set out to explore how these vulnerable groups could be protected against the impact of coronavirus. On 17 April, we launched our inquiry, asking for written evidence on how effective Government support had been so far and what problems still remained.¹³ We received over 300 responses despite setting a small submission window of only 2 weeks, including surveys from 38 Degrees and Generation Rent of 5,520 and 1,560 renters respectively.¹⁴ On Monday 11 May, we held a virtual evidence session with two panels: the
- 1 Crisis, It's No Life At All, 2016
- 2 Crisis, It's No Life At All, 2016
- 3 The official term for the disease is COVID-19. Coronavirus is a term which applies to a specific group of viruses. However, it has become common to refer to the current diseases as coronavirus, and we use this common approach through our report.
- 4 From the initial results of a survey, as reported in <u>Fears of catastrophic coronavirus outbreak among homeless</u> in hostels', The Observer, 19 April 2020
- 5 ONS, Deaths of homeless people in England and Wales: 2018, 1 October 2019
- 6 Resolution Foundation, Inequality Street: Housing and the 2019 general election, November 2019, p8
- 7 Office for National Statistics, UK private rented sector: 2018, 18 January 2019
- 8 Resolution Foundation, Housing Outlook Q2 2020, 9 April 2020, Figure 1
- 9 House of Commons Library, Poverty in the UK: statistics, SN7096, 29 April 2020
- 10 Citizens Advice (IOC170)
- 11 Shelter (IOC234)
- 12 Generation Rent (IOC242)
- Housing, Communities and Local Government Committee, Impact of Covid-19 (Coronavirus) on homelessness and the private rented sector inquiry launched, 17 April 2020
- Housing, Communities and Local Government Committee, Impact of Covid-19 (Coronavirus) on homelessness and the private rented sector: written evidence, 14 May 2020

first with Jon Sparkes, Chief Executive of Crisis, and Jamie Carswell, Director of Housing and Safer Communities at the Royal Borough of Greenwich, representing London Councils; and the second with the Minister for Rough Sleeping and Housing, Luke Hall MP, along with John Hall, Director of Homelessness at the Ministry for Housing, Communities and Local Government. We believe the session revealed concerns that require immediate action by Government.

- 4. Many of the submissions we received were from individuals in precarious circumstances. We thank them for coming forward. Their stories helped us understand how the coronavirus is affecting people's lives across the country.
- 5. This interim report sets out what we believe the Government must do as soon as possible to protect rough sleepers and renters. These recommendations are set out in Chapters 2 and 3. In Chapter 4 we indicate what problems still need to be solved, even if the Government takes the action we advise, including on rent arrears and social housing. We do not devalue the importance of these issues, but believe our recommendations provide breathing room to implement longer-term solutions. We will return to them over the coming weeks and months.

2 Protecting rough sleepers

Funding an exit plan

6. Working with local authorities, charities, and national hotel chains, the Government ensured around 90% of identified rough sleepers were removed from the streets and received offers of temporary accommodation.¹⁵ This was supported by a £3.2m fund to reimburse local authorities for emergency accommodation and support for rough sleepers.¹⁶ This action undoubtedly saved lives and has been celebrated across the sector. It showed that with co-ordinated action, a shared will, and funding, rough sleepers can be taken off the streets and given a chance to turn their lives around. Jon Sparkes, Chief Executive of Crisis, the homelessness charity, was effusive in his praise for what had been achieved:

I have to say that the efforts of the Department, local authorities and charities throughout the country have been nothing short of phenomenal. The fact that 5,500, or possibly even 6,000, people who are most exposed to the virus, because of underlying health conditions, inability to access sanitation facilities and inability to self-isolate—it has been an amazing and unprecedented effort. To have that many people now safely in self-contained accommodation, so quickly, has been quite remarkable.¹⁷

7. Despite this positive move, there is not yet an exit plan from what is a temporary measure. On 2 May, the Government appointed Dame Louise Casey to lead a Rough Sleeping Taskforce, whose "key overriding goal" will be "to ensure that as few people as possible return to the streets". ¹⁸ Hotels may begin reopening in early July, according to the Government's COVID-19 recovery strategy. ¹⁹ St Mungo's, the homelessness charity, told us the importance of taking further action:

The efforts that we are seeing now represent a unique opportunity to bring us much closer to ending rough sleeping once and for all. Many of the people who are now being supported in hotels had been living on the streets for months or years.

It would be a tragedy if this opportunity was squandered.²⁰

St. Mungo's concluded that Government action could ensure "everyone gets the housing and support they need to rebuild their lives away from the streets for good", and called on the Government to commit to preventing anyone accommodated as part of the emergency response returning to the streets by urgently providing the additional funding local authorities need.²¹

Ministry of Housing, Communities and Local Government, Correspondence: Dame Louise Casey writes to Local Authority homelessness managers and rough sleeping co-ordinators, 23 April 2020

Ministry of Housing, Communities and Local Government, Press release: £3.2 million emergency support for rough sleepers during coronavirus outbreak, 17 March 2020

¹⁷ Q1

¹⁸ Q3

¹⁹ Cabinet Office, Our plan to rebuild: The UK Government's COVID-19 recovery strategy, 12 May 2020, para 4.3

²⁰ St. Mungo's (IOC258), paras 56-57

²¹ St. Mungo's (IOC258), paras 61-62

Box 1: Greater Manchester Combined Authority leaked report, 14 May

On 14 May, the Manchester Evening News published an article claiming that the Government would stop funding the accommodation of rough sleepers and withdrawing its guidance to local authorities, based on an internal report by the Greater Manchester combined authority.²² In a blog post, MHCLG said the article was wrong and the Government was not reneging on its commitments.²³ In a letter for the Secretary of State, Andy Burnham, the Mayor of Greater Manchester, said that Manchester councils were concerned the level of funding was insufficient to meet costs, calling for significant funding and a change in policy.²⁴ Our recommendation below calls for a further dedicated funding stream for the next step beyond the 'Everyone In' initiative.

- 8. We do not find the Government's goal ambitious enough. It would be extraordinary, if, after taking this courageous action, the Government does not do everything in its power to ensure every single person taken from the streets does not return to rough sleeping. Both the Secretary of State and the Minister for Rough Sleeping emphasised how complex and difficult the next stage would be, with the Secretary of State stating that the Government would "try and move as many people as possible into [the right kind] of accommodation. Notwithstanding the difficulty of the challenge, the Taskforce will likely fall short without the same backing of political will, co-ordination, and funding. Now is the occasion and opportunity to make a difference and begin to fulfil the promise to end rough sleeping. Based on work conducted by Crisis, we estimate it may cost around £100m a year initially to fund a housing-led solution with appropriate wrap-around support for this rough sleeping cohort; as a comparison, MHCLG spent £100m on its Rough Sleeping Strategy in summer 2018, which achieved a 2% reduction in rough sleeping. This money would go much further.
- 9. This is a golden opportunity to end rough sleeping in England once and for all. The Government's taskforce must estimate the cost of a housing-led solution with appropriate wrap-around support, using the expertise of charitable organisations and local councils. We received evidence that this is likely to be £100 million a year at a minimum. The Government must provide this as a dedicated funding stream to councils to ensure these people are accommodated safely and securely. As part of this, the Government should publish the results of the Housing First pilots and accelerate delivery of Housing First across the country, to help increase the availability of wraparound support services alongside good-quality accommodation.

No recourse to public funds

10. Individuals suffering from homelessness who have no recourse to public funds (NRPF)—which means they may be prevented from claiming welfare benefits, homelessness assistance, housing allocation and access to emergency accommodation—continue to be at risk during the coronavirus crisis. These are individuals who are subject to immigration

^{22 &}quot;The numbers of the streets are going to rocket': Homeless people put up in hotels amid pandemic to be kicked out as government quietly scraps scheme', Manchester Evening News, 14 May 2020

²³ MHCLG in the Media, Response to Manchester Evening News story on support for rough sleepers, 15 May 2020

²⁴ Correspondence from Andy Burnham, Mayor of Greater Manchester, to Rt Hon. Robert Jenrick MP, Secretary of State for Housing, Communities and Local Government, 15 May 2020

²⁵ Q37; Oral evidence taken on 4 May 2020, HC (2019–21) 302, Q110

²⁶ Q9

²⁷ Ministry of Housing, Communities and Local Government (IOC308)

control, either because their leave to enter or remain in the UK is conditional, or they do not have leave to enter or remain. The Government waived any normal legal barriers to ensure rough sleepers could be temporarily housed by local authorities and charities, but has otherwise kept a firm line that no recourse to public funds will continue. Crisis has previously summarised the issues faced by migrant homeless people:

The difficulties migrant homeless people face, as well as homelessness itself, mostly centre upon the numerous ways statutory services are restricted or denied to them.²⁸

- 11. Jamie Carswell, Director of Housing and Safer Communities for the Royal Borough of Greenwich, representing London Councils, estimated that 900 of the 3,600 rough sleepers accommodated in London had no recourse to public funds. When asked about the prospect of move-on accommodation for these 900, Mr Carswell said:
 - [...] it is quite low in the current circumstances. As we move further from a public health emergency, there is still a lack of clarity in the system on what is legal for local authorities to do. Even if it is legal, it means financial pressure at a time of extreme financial stress to local authorities. Just to pick up the strain of that in the system would feel very unrealistic.²⁹

We challenged the Minister on what would happen to those in the rough sleeping cohort who had no recourse to public funds. He told us that "the basic legal position is not going to change" and decisions should be made at a local level, "working within the law". The Secretary of State said that "local councils do have a degree of discretion", which they often use during cold weather in winter, and appeared to indicate councils would not receive additional funding if they chose to help these people.³⁰

- 12. While the legal position might be clear and unlikely to change, councils need clarity on how and when they can support these people. The Local Government Association summarised the problem:
 - [...] vital work is made difficult by the NRPF conditions as councils must respond within the parameters of the law and avoid use of prohibited public funds. Support from local welfare funds is also legally unavailable to people with NRPF. Government guidance on public funds or information has not been updated to set out what government assistance schemes can or cannot be accessed by a person with no recourse to public funds, leading to a variance in provision [...] There has been limited and conflicting information available to councils on whether the £3.2 million emergency fund to support rough sleeping can be used to support people with NRPF. It is also unclear to what extent the Government's Covid-19 emergency funding will adequately meet additional costs.³¹

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Crisis, Everybody In: How to end homelessness in Great Britain,, 11 June 2018, Chapter 12

²⁹ Q5

³⁰ Oral evidence taken on 4 May 2020, HC (2019–21) 302, Qq112, 113

³¹ Local Government Association (IOC165), paras 3.6.2-3.6.4

The LGA estimated that in 2018–19, before the crisis, unfunded NRPF provision cost 59 councils £47.5m a year, and recommended that if the Government was not minded to relax NRPF conditions, it must provide accessible and clear guidance and adequate funding for councils to support people with no recourse to public funds.

13. We appeal on humanitarian grounds for the Government to improve its support to councils for people with no recourse to public funds during this crisis, or hundreds will return to the streets with potentially disastrous consequences. We recommend that the Government should guarantee it will compensate councils for provision offered to rough sleepers with no recourse to public funds as a result of the current crisis. While the Government believes the legal position is clear, local authorities do not. In addition, we ask the Government to urgently publish guidance on councils' use of discretion in these circumstances and clarify what people can or cannot claim when they have no recourse to public funds.

Increasing housing availability in the short-term

14. Even before the coronavirus crisis, demand for housing for the homeless outstripped supply. The most recent MHCLG statistics reveal that 87,000 homeless families were living in temporary accommodation prior to the coronavirus crisis, ³² and the Children's Commissioner for England estimated that around 90,000 further families were considered to be 'hidden homeless' as they were sofa-surfing between family and friends. ³³ As Jamie Carswell, representing London Councils, told us, "there is no secret supply of additional council housing or social rented housing". ³⁴ The lack of social housing is a long-term problem for this country and there is no conceivable way of producing enough in a short time. ³⁵ But there are short-term alternatives.

15. In July 2008, in response to the global financial crisis and its impact on the housing market, the then Department for Communities and Local Government set up a National Clearing House to enable house builders with proposals to sell their unsold stock for affordable housing.³⁶ The scheme was funded by grant funding from the existing Affordable Housing Programme at the time. Our predecessor Committee reported that "developers and lenders welcomed the initiative", and recommended that it should be extended to include homes not sold on the open market for a period of a year or more.³⁷ On 6 May, the latest Purchasing Managers Index—which shows economic trends in the manufacturing and service sectors—found that construction activity suffered its sharpest ever decline in activity since records began, beyond the previous record low in February 2009 following the global financial crash.³⁸ Though we note the Government's actions on restarting house building, including allowing extended working hours on construction sites, the future of the economy and the housing market remain uncertain.

Ministry of Housing, Communities and Local Government, Statutory homelessness live tables, Table TA1 - Number of Households in temporary accommodation at the end of quarter, Q3 2019

³³ Children's Commissioner for England (IOC270)

³⁴ Q14

³⁵ See Chapter 4 for more information on our inquiry into the long-term delivery of social and affordable housing and our next steps.

³⁶ Communities and Local Government Committee, <u>Housing and the Credit Crunch</u>, 3rd Report of Session 2008–09, paras 38–41

³⁷ Ibid, para 39

^{38 , &#}x27;Construction activity crashes to record low', Construction News, 6 May 2020

- 16. We believe a similar scheme could work in these circumstances. Councils and housing associations could focus on acquisitions of existing properties, or properties close to completion, using grant funding from Government and Right to Buy receipts. At the moment, councils are limited in their use of Right to Buy receipts. In written evidence submitted to our inquiry into the long-term delivery of social and affordable housing, councils and organisations reported that restrictions around the use of Right to Buy receipts were a major constraint on delivery. Local authorities are unable to combine receipts with other forms of public subsidy (such as grant) and can only use receipts to fund 30% of a replacement home (whether through acquisition or new build), with the remaining 70% requiring additional funding. Furthermore, the Local Government Association told us that councils had raised concerns about the requirement to return Right to Buy receipts to the Treasury if unspent in three years, given that many development sites closed during the crisis. The Government consulted on changes to Right to Buy receipts in 2018 but has never published its response.
- 17. The Government must ensure that rough sleepers do not end up back on the streets due to a lack of suitable housing. We recommend the Government act to boost the immediate availability of appropriate supported housing, by providing targeted grant funding for councils and housing associations to acquire properties. The Department should work with the Local Government Association and the National Housing Federation and others on the design of this scheme, including how to target it at both existing properties and those close to completion which may no longer be in demand, using the National Clearing House Scheme from 2008 as a starting point. We also ask the Government to remove restrictions on Right to Buy receipts, so councils can use different pots of funding together and use 100% of sales to fund these acquisitions, as well as extending the deadline for their use from three years to five years.

³⁹ See, for example: London Borough of Hackney (SAH073), Royal Borough of Greenwich (SAH071), Cambridge City Council (SAH066), London Borough of Camden (SAH063), Campaign for the Protection of Rural England (SAH036)

⁴⁰ Local Government Association (IOC165), para 2.9

3 Protecting renters

18. On 18 March, the Secretary of State announced that tenants across both the private and social rented sectors would not face eviction during the crisis. ⁴¹ The Coronavirus Act 2020 amended the notice period for landlords seeking possession from two months to three months, ⁴² and the courts issued Practice Direction 51Z which suspended all ongoing and any new housing possession claims for 90 days until 25 June, subject to review and extension. ⁴³ The Government has committed to explore the potential of expanding the pre-action protocol (PAP), used in claims by social landlords, to the private rented sector. ⁴⁴ The Government also raised the Local Housing Allowance rate to the 30th percentile. ⁴⁵ On a broader front, renters may benefit from the range of other coronavirus measures introduced by Government, including the Coronavirus Job Retention Scheme.

Legislating to prevent evictions

19. The measures are welcome, but as many submissions pointed out to us, the Government has not prevented tenants being evicted. From 25 June—or later if extended—there will be a cliff-edge when eviction proceedings can begin again. Shelter told us:

The current temporary suspension of evictions in the county court is the only significant protection for England's 11 million private renters, the majority of whom are still at a perpetual risk of being evicted for no reason whatsoever, under Section 21 of the Housing Act 1988.⁴⁶

As soon as courts begin processing possession claims once more, tenants can be evicted under section 21 of the Housing Act 1988, which requires no specific reason for possession, and under mandatory ground 8 of section 8 of the 1988 Act, because in these cases possession is mandatory as long as the correct procedure has been followed.⁴⁷ Jamie Carswell of London Councils warned of councils facing a "tsunami":

My colleagues, particularly in London, are filled with dread at the thought of facing a cliff edge when the evictions extension expires under the current emergency legislation. If we are not to face a tsunami of those who are served with a section 21 and then end up presenting themselves to their local authority in late June or early July, we need a way of removing that cliff edge and a series of measures to create a far more sustainable degree of security in the private rented sector.⁴⁸

20. In response to this danger, the Government has proposed extending the pre-action protocol, currently applied to social landlords seeking possession, to the private rented sector. The Secretary of State told us this would put "a duty on the landlord to work in

⁴¹ Ministry of Housing, Communities and Local Government, Press release: Complete ban on evictions and additional protection for renters, 18 March 2020

⁴² Coronavirus Act 2020, s81 & Schedule 29

⁴³ Courts and Tribunal Judiciary, 117th Practice Direction Update to the Civil Procedure Rules - Coronavirus Pandemic related, 27 March 2020

⁴⁴ Ministry of Housing, Communities and Local Government, Press release: Complete ban on evictions and additional protection for renters, 18 March 2020

⁴⁵ The Social Security (Coronavirus) (Further Measures) Regulations 2020

⁴⁶ Shelter (IOC234)

⁴⁷ Housing Act 1988

⁴⁸ Q12

good faith with their tenant", and that pre-action protocols would need to be complied with before rent arrears-based possession proceedings could commence.⁴⁹ The Minister of Rough Sleeping and Housing told us the Department was "still in the scoping phase of trying understand [what is] deliverable that will be effective and do everything possible to encourage that early conversation between the landlord and the tenant", adding later that the Government wanted to work within the existing framework of legislation, and noted that "non-compliance still results in a party being penalised".⁵⁰ Although the Minister is correct that breach of a PAP may be taken into account when a judge makes a decision about who pays legal costs—potentially meaning the landlord could be deprived or some or all of their costs—the tenant would nonetheless be evicted, as a court must give possession if the requirements of mandatory ground 8 or section 21 have been satisfied.

21. We received evidence which argued the pre-action protocol would not be sufficient to prevent evictions under section 21 or for a ground 8 rent arrears claim. Giles Peaker, a housing solicitor, told us in those circumstances that "failure to comply with a PAP simply cannot prevent a possession order being made, or indeed result in a delay to a possession order being made to any significant degree".⁵¹ In a similar vein, Citizens Advice told us:

In theory, Courts should take into account whether this protocol has been followed when considering what orders to make in social housing. However, this only applies to discretionary grounds in practice. Private landlords rarely use only discretionary grounds—they may use either ground 8, section 8 of the Housing Act 1988 (a mandatory ground), or section 21, or both. ⁵²

- 22. We are wary of the Government reliance on conversations between landlords and tenants which have little legal force. Housing security for renters should not rest with individuals. The Government is already aware that tenants require greater security in the rental sector: it said as much in the Queen's Speech background briefing notes on the planned Renters' Reform Bill.⁵³ Legislating to protect tenants from the minority of landlords lacking compassion does not invalidate the premise that most landlords behave in good faith; it protects those at the sharp edge of the crisis from facing homelessness.
- 23. At the moment, judges cannot exercise any such discretion for section 21 applications or mandatory ground 8 section 8 applications, as discussed. We append to this report an example Bill which would achieve the desired result. The Government should use this as a starting point for a short, focused Bill, and introduce it before Parliament as soon as possible to ensure it receives Royal Assent in advance of the 25 June.⁵⁴ The Government will need to ensure it extends the same protection to the social rented sector, which would require similar amendments to rent arrears grounds under the Housing Act 1985.⁵⁵
- 24. Unless the Government amends existing housing legislation, its plans to introduce a pre-action protocol to the private rented sector will be toothless and will fail to prevent a cliff edge of evictions once the moratorium on possession cases ends. We recommend the Government bring forward legislation to amend the 1985 and 1988 Housing Acts to

⁴⁹ Oral evidence taken on 4 May 2020, HC (2019–21) 302, Q103

⁵⁰ Q22

⁵¹ Giles Peaker (IOC310)

⁵² Citizens Advice (IOC170)

^{53 10} Downing Street, The Queen's Speech 2019: background briefing notes, p46

⁵⁴ If the Government extends Practice Direction 51Z, it would have more time, although the summer recess may shorten opportunities.

⁵⁵ Giles Peaker (IOC310)

allow judges to use discretion where a tenant is in rent arrears due to the coronavirus crisis for the next 12 months at a minimum. Discretion could include consideration of whether a pre-action protocol has been complied with. These amendments should be delivered through a short Bill—such as we have proposed—which must be introduced to Parliament as soon as possible.

Abolishing section 21

- 25. The Government already intends to abolish the use of 'no fault evictions' by removing section 21 of the Housing Act 1988 through the proposed Renters' Reform Bill.⁵⁶ John Hall, Director of Homelessness at MHCLG, told us that the Department was "committed to bringing forward the Renters' Reform Bill as soon as we can", but wanted to make sure "when we do the legislative change, it is the right one".⁵⁷
- 26. The abolition of section 21 was a common theme in the written evidence we received. The Chartered Institute for Housing called for the Government to tackle the insecure nature of private rented sector tenure by abolishing section 21 evictions "as the starting point for long-term reform" of the private rented sector.⁵⁸ Shelter, the housing charity, said the Government has already accepted that "the relationship between landlord and tenant must be rebalanced" and it was essential that the Government followed through on its promise to improve security for private renters by scrapping section 21 evictions.⁵⁹
- 27. As long as section 21 remains on the statute book, it will remain an option for landlords. The insecurity of tenants has been put into sharp relief by the coronavirus crisis, so it is important the Government moves the Renters' Reform Bill up its legislative agenda. By amending the Housing Act 1988 to allow judges to use discretion for coronavirus-related rent arrears for 12 months, the Government creates breathing space to develop a Bill which has the support of both tenants and landlords. It is important that the Bill also delivers longer assured shorthold tenancies. We would welcome an early opportunity to consider the contents of such a Bill.
- 28. The Government must accelerate its plans to introduce the Renters' Reform Bill to Parliament and abolish 'no fault evictions' under section 21 of the Housing Act 1988 within the next 12 months. By amending the Act to allow judges to exercise discretion, the Government will have time to deliver a Bill which provides greater security for tenants.

Local Housing Allowance

29. The Local Housing Allowance (LHA) rate determines the maximum financial support renters can claim in the private rented sector. In response to the crisis, the Government readjusted the LHA rate to the 30th percentile of local market rents from April for universal credit and housing benefit claimants, reversing the freeze on the benefit introduced in 2016.⁶⁰ MHCLG estimated this was an additional £1bn of financial support and would

^{56 10} Downing Street, The Queen's Speech 2019: background briefing notes, p46

⁵⁷ Q31

⁵⁸ Chartered Institute of Housing (IOC160)

⁵⁹ Shelter (IOC234)

The Social Security (Coronavirus) (Further Measures) Regulations 2020

benefit over 1m households, with claimants on average receiving £600 more a year.⁶¹ Jon Sparkes of Crisis said that "the local housing allowance [increase] overnight has made a difference, even under the most testing of circumstances".⁶²

- 30. The rise in the LHA rate was warmly welcomed in our written evidence, although several organisations called for the Government to go further. The National Residential Landlords Association, who represent around 80,000 private landlords, said many tenants were still concerned they will be unable to pay their rent despite the benefit safety net, and called for the LHA rate to be raised further to the 50th percentile. Generation Rent made the same recommendation, as well as calling for the household benefit cap to be lifted, citing Shelter research that found tenants in London may face shortfalls of over £1000 due to the cap. When we put this to the Minister, he rejected raising it to the 50th percentile, noting that if tenants still have a gap between rent and the LHA, the Government has increased the hardship fund and special housing payments. We note that many of the announcements by Government on the LHA rate do not include analysis of how many people have benefited from the change, and what gaps might still remain for renters. If it is the Government's intention to ensure tenants can pay rents by subsidising their income through the benefit system, it must be aware if shortfalls exist and take further action.
- 31. The Government must ensure that the Local Housing Allowance (LHA) rate is set at a level that reflects real market rents and ensures those in need are able to afford properties in their areas. We call on the Government to guarantee that the LHA rate will be maintained at the 30th percentile long-term. We also ask the Government to conduct work on what the impact on renters and the wider rental market would be of raising LHA rates further.

⁶¹ Ministry of Housing, Communities and Local Government (IOC308)

⁶² Q1⁻

⁶³ National Residential Landlords Association (IOC127)

⁶⁴ Generation Rent (IOC242)

⁶⁵ Q28

4 Beyond the crisis

32. The recommendations we made in Chapters 2 and 3 require immediate action from the Government. Rough sleepers will be housed in secure accommodation and renters will not be evicted due to rent arrears caused by the crisis. The next step is for the Government to determine a policy solution for what to do with the rent arrears, which will continue to exist and build up even if tenants are protected from eviction.

Rent arrears

- 33. Our evidence suggested a wide range of policy solutions. One suggestion which has gained publicity in recent times is that rent arrears could be cancelled for all renters. We note there may be a number of barriers to such an approach. For social landlords, cancelling arrears would undermine the Housing Revenue Accounts of local authorities, which could cause repairs and new builds to stop. Housing associations also make business decisions predicated on rental income, and would face similar difficulties. For the private rented sector, the Government would almost certainly face a legal challenge based on the right to property under Protocol No. 1, Article 1 of the European Convention of Human Rights. The other more practical point is that the current structure of the private rented sector—whether or not one believes reform is necessary—means a majority of landlords own just one property, and would struggle to deal without rental income over a significant period of time. The contract of the private rented sector of time.
- 34. Nevertheless, it is important for the Government to consider other approaches, including the potential for long-term no-interest loans to cover rent arrears, as is the case in Spain.⁶⁸ We will continue our inquiry and take evidence on policy options for rent arrears over the coming weeks, recognising the potential for substantial rent arrears to build up, which could be significant in relation to the period of tenancy outstanding.

Social housing

35. In our inquiry into the long-term delivery of social and affordable housing, we have heard that the demand for social housing is high, with an estimated 90,000 social rented homes needed every year for the next ten years.⁶⁹ Last year, just 6,287 social rented homes were built in England.⁷⁰ We put this to the Minister, asking whether it was time for the Government to invest in an ambitious programme for social housebuilding. The Minister said in response:

The Government's record since 2010, delivering 464,000 affordable homes in a range of tenures, is a positive one [...] We are completely committed to the delivery of our flagship affordable homes programme.⁷¹

36. The use of affordable housing by the Minister in this context relates to Annex 2 of the National Planning Policy Framework, which defines affordable housing as any housing

- 66 Council of Europe, European Convention on Human Rights, Protocol No. 1, Article 1
- 67 Kath Scanlon and Christine Whitehead, The profile of UK private landlords, December 2016
- 68 Citizens Advice Bureau Spain, Coronavirus conditions of rent micro-loans, 1 May 2020
- 69 For example, see: National Housing Federation (SAH047), Crisis (SAH023)
- 70 Ministry of Housing, Communities and Local Government, <u>Table 1000: additional affordable homes provided by</u> type of scheme, England, last updated 3 December 2019
- 71 Q57

for sale or rent, for those whose needs are not met by the market.⁷² It includes other affordable route to home ownership, including shared ownership. We are not convinced the housing need, which identified the need for 90,000 social rented homes every year, would be satiated by low cost home ownership. The need for social housing, already high, is only likely to increase even more as the economic impact of coronavirus becomes clear. We will finish our inquiry into the long-term delivery of social and affordable housing in the coming weeks, and publish a report with our recommendations before the summer recess.

Conclusion

37. The recommendations we make in this report require urgent consideration and action. We therefore ask the Government to respond to our recommendations by 12 June, rather than the usual two months. We will return to these crucial issues in the coming weeks and months.

Conclusions and recommendations

Protecting rough sleepers

- 1. This is a golden opportunity to end rough sleeping in England once and for all. The Government's taskforce must estimate the cost of a housing-led solution with appropriate wrap-around support, using the expertise of charitable organisations and local councils. We received evidence that this is likely to be £100 million a year at a minimum. The Government must provide this as a dedicated funding stream to councils to ensure these people are accommodated safely and securely. As part of this, the Government should publish the results of the Housing First pilots and accelerate delivery of Housing First across the country, to help increase the availability of wraparound support services alongside good-quality accommodation. (Paragraph 9)
- 2. We appeal on humanitarian grounds for the Government to improve its support to councils for people with no recourse to public funds during this crisis, or hundreds will return to the streets with potentially disastrous consequences. We recommend that the Government should guarantee it will compensate councils for provision offered to rough sleepers with no recourse to public funds as a result of the current crisis. While the Government believes the legal position is clear, local authorities do not. In addition, we ask the Government to urgently publish guidance on councils' use of discretion in these circumstances and clarify what people can or cannot claim when they have no recourse to public funds. (Paragraph 13)
- 3. The Government must ensure that rough sleepers do not end up back on the streets due to a lack of suitable housing. We recommend the Government act to boost the immediate availability of appropriate supported housing, by providing targeted grant funding for councils and housing associations to acquire properties. The Department should work with the Local Government Association and the National Housing Federation and others on the design of this scheme, including how to target it at both existing properties and those close to completion which may no longer be in demand, using the National Clearing House Scheme from 2008 as a starting point. We also ask the Government to remove restrictions on Right to Buy receipts, so councils can use different pots of funding together and use 100% of sales to fund these acquisitions, as well as extending the deadline for their use from three years to five years. (Paragraph 17)

Protecting renters

4. Unless the Government amends existing housing legislation, its plans to introduce a pre-action protocol to the private rented sector will be toothless and will fail to prevent a cliff edge of evictions once the moratorium on possession cases ends. We recommend the Government bring forward legislation to amend the 1985 and 1988 Housing Acts to allow judges to use discretion where a tenant is in rent arrears due to the coronavirus crisis for the next 12 months at a minimum. Discretion could include consideration of whether a pre-action protocol has been complied with. These amendments should be delivered through a short Bill—such as we have proposed—which must be introduced to Parliament as soon as possible. (Paragraph 24)

- 5. The Government must accelerate its plans to introduce the Renters' Reform Bill to Parliament and abolish 'no fault evictions' under section 21 of the Housing Act 1988 within the next 12 months. By amending the Act to allow judges to exercise discretion, the Government will have time to deliver a Bill which provides greater security for tenants. (Paragraph 28)
- 6. The Government must ensure that the Local Housing Allowance (LHA) rate is set at a level that reflects real market rents and ensures those in need are able to afford properties in their areas. We call on the Government to guarantee that the LHA rate will be maintained at the 30th percentile long-term. We also ask the Government to conduct work on what the impact on renters and the wider rental market would be of raising LHA rates further. (Paragraph 31)

Conclusion

7. The recommendations we make in this report require urgent consideration and action. We therefore ask the Government to respond to our recommendations by 12 June, rather than the usual two months. We will return to these crucial issues in the coming weeks and months. (Paragraph 37)

Annex: Draft Coronavirus (Protection of **Assured Tenants) Bill**

Draft Coronavirus (Protection of Assured Tenants) Bill

CONTENTS

- Application
- Higher rent arrears: court discretion Expiry or termination of assured shorthold tenancies: court discretion
- Meaning of coronavirus and associated expressions
- Extent, commencement, expiry and short title

1 Application

- (1) Sections 2 and 3 (which extend the cases in which courts have a discretion when considering making orders for possession) apply at a hearing, in the relevant period, of proceedings for possession of a dwelling-house in England.
- (2) In this Act –

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"the relevant period" means the period –

- (a) beginning with the day after the day on which this Act is passed, and
- (b) ending with 31 December 2020; and
- "the 1988 Act" means the Housing Act 1988 (c. 50).

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2 Higher rent arrears: court discretion

- (1) The 1988 Act is to have effect as if
 - (a) Ground 8 in Part 1 of Schedule 2 appeared instead in Part 2 of that Schedule, and
 - (b) in section 8(5) for ", 7B or 8" there were substituted "or 7B".

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- (2) Subsection (3) applies if the court is considering under section 7(4) of the 1988 Act whether it is reasonable to make an order for possession on Ground 8 in Schedule 2 of the 1988 Act.
- (3) The court must consider, in particular, the extent to which the rent arrears are a result of coronavirus.

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- (4) In subsection (3), rent arrears includes any part of the rent arrears.
- (5) This section does not affect the validity of any notice under section 8 of the 1988 Act.

3 Expiry or termination of assured shorthold tenancies: court discretion

(1) The 1988 Act is to have effect as if –

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- (a) in subsections (1) and (4) of section 21
 - (i) for the word "shall" there were substituted "may";
 - (ii) after paragraph (a), in both subsections, the word "and" were omitted;
 - (iii) after paragraph (b), in both subsections, there were inserted "; and

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- (c) that it is reasonable to make an order for possession."; and
- (b) section 9(6)(b) were omitted.
- (2) Subsection (3) applies if the court is considering under section 21(1) or (4) of the 1988 Act whether it is reasonable to make an order for possession.

_		Drujt Coronworns (Frotection of Fissurea Tenuncis) But	
	(3)	The court must consider, in particular —	
		(a) the extent to which the landlord or, in the case of joint landlords, any of them is seeking possession because (wholly or partly) of rent arrears, and	
		(b) the extent to which any rent arrears are a result of coronavirus.	5
	(4)	In subsection (3)(b), rent arrears includes any part of any rent arrears.	
4		Meaning of coronavirus and associated expressions	
	(1)	For the purposes of this Act, arrears are a result of coronavirus — (a) if the effects of coronavirus caused or contributed, directly or indirectly, to the existence, including continued existence, of those arrears, and	10
		(b) whether or not the tenant is or has been infected with coronavirus.	
	(2)	In this Act, "coronavirus" has the meaning given in section 1 of the Coronavirus Act 2020 (c. 7).	
5		Extent, commencement, expiry and short title	15
	(1)	This Act extends to England and Wales.	
	(2)	This Act comes into force on the day on which it is passed.	
	(3)	This Act expires at the end of 31 December 2020.	
	(4)	This Act may be cited as the Coronavirus (Protection of Assured Tenants) Act 2020.	20

Explanatory Notes

Overview of the draft clauses

- 1) The draft clauses would allow the courts to choose whether to order private tenants to give up possession of their homes in two situations where normally such orders are mandatory. Those situations are:
 - high rent arrears (usually 8 weeks or 2 months' rent)
 - the end of an assured shorthold tenancy.

Territorial application of the draft clauses in the UK

2) The draft clauses would *extend* to England and Wales, which is a single legal jurisdiction. But housing is a matter within the legislative competence of the National Assembly for Wales, and the clauses would therefore *apply* only in relation to tenancies in England.

Commentary on the draft clauses

- 3) The draft clauses relate to assured tenancies only. These are tenancies under the Housing Act 1988. The court would have a new discretion when considering ordering possession under:
 - Section 8 of the 1988 Act on the basis of Ground 8 in Schedule 2
 - Section 21 of the 1988 Act
- 4) All (relevant) possession proceedings are currently stayed until late June 2020. The draft clauses would change the powers of the courts temporarily, once they start hearing possession proceedings again. The new powers would apply at hearings which take place between their enactment and the end of 2020. This is a temporary change. The legislation *could* (though the draft does not) include power for the Government to extend this period.

Clause 1: Application

5) This draft clause would ensure that the new powers apply at any court hearing in period between enactment of the clauses and the end of 2020. It introduces the main clauses (2 and 3) and defines what is meant by the 1988 Act.

Clause 2: Higher rent arrears: court discretion

6) This draft clause would require the court to read the 1988 Act as if Ground 8 were in Part 2 of Schedule 2 rather than Part 1. Under section 7 of the 1988 Act, if a ground appears in Part 1, the court must make an order for possession (except in very limited circumstances). If a ground appears in Part 2, the court has a discretion to order possession, if it considers it reasonable to do so.

- 7) The draft clause would require a court, when deciding whether it is reasonable to order possession, to give particular thought to the extent to which the arrears (or any part of them) were caused (or contributed to) by the coronavirus.
- 8) Reading the 1988 Act as if Ground 8 were in Part 2 of Schedule 2 would also mean that the court would have the extended discretion (set out in section 9) to adjourn proceedings, or to suspend or postpone possession, on condition the tenant pays towards the rent and arrears (unless this would be unreasonable or cause exceptional hardship).
- 9) The clause would allow a court to dispense with the need for a notice where it is just and equitable and ground 8 is relied on. The court has this power for most other grounds but not for high rent arrears. However, if possession is no longer mandatory, allowing the court to grant possession in the absence of a notice (but only where this is fair) strikes an appropriate balance.
- 10) The draft clause ensures that nothing it contains affects the validity of a notice. This ensures that a notice is not invalid because, for example, it refers to Ground 8 as a mandatory ground for possession (as does the currently prescribed form). It may be that the Government would prescribe new forms.

Clause 3: Expiry or termination of assured shorthold tenancies: court discretion

- 11) This draft clause would deal with situations where a landlord seeks possession because of the expiry or termination by notice of an assured shorthold tenancy. Normally, the courts must grant possession if a landlord has served the right notice (often known as a "section 21 notice") at the right time. The draft clause would operate by instead giving the court a discretion to order possession if satisfied that this would be reasonable.
- 12) The draft clause would also give the courts the extended discretion in section 9 (to adjourn proceedings or suspend or postpone possession) in these cases.
- 13) As with clause 2, this clause would require a court, when deciding whether it is reasonable to order possession, to give particular thought to the extent to which any arrears (or any part of them) were caused (or contributed to) by the coronavirus. But it would also require the courts to consider whether the landlord was motivated to seek possession because of rent arrears.

Clause 4: Meaning of coronavirus and associated expressions

- 14) This draft clause defines what is meant by coronavirus (using an existing statutory definition) and explains that rent arrears should be considered to have arisen because of coronavirus:
 - regardless of whether a tenant has had the virus
 - where the arrears have built up or not been reduced because of the virus
 - whether the virus was the only cause or just one factor
 - whether the virus directly or indirectly (perhaps, for example, because of legislative measures to control the spread of the virus) caused the arrears

Clause 5: Extent, commencement, expiry and short title

15) The draft clauses would extend to England and Wales. This is the legal "jurisdiction" (or body of laws) which the changes to the law would form part of. The changes would only have any practical effect in England. They would come into force when enacted and would expire at the end of 2020, after which at any hearing of possession proceedings the court would apply the law as it stands at the moment.

Formal minutes

Wednesday 20 May 2020

Members present:

Mr Clive Betts, in the Chair

Bob Blackman Paul Holmes

Ian Byrne Rachel Hopkins

Brendan Clarke-Smith Abena Oppong-Asare

Ben Everitt Mary Robinson

Draft Report (Protecting rough sleepers and renters: Interim Report) proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 37 read and agreed to.

Summary agreed to.

Annex agreed to.

Resolved, That the Report be the First Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[Adjourned until Friday 5 June at 10.00am.

Witnesses

The following witnesses gave evidence. Transcripts can be viewed on the inquiry publications page of the Committee's website.

Monday 11 May 2020

Jon Sparkes, Chief Executive, Crisis; Jamie Carswell, Co-Chair, London Housing
Directors' Network, London Councils

Q1–17

John Hall, Director of Homelessness, Ministry of Housing, Communities and Local
Government; Luke Hall MP, Parliamentary Under Secretary of State (Minister
for Rough Sleeping and Housing), Ministry of Housing, Communities and Local
Government

Q18–65

Written evidence

The following written evidence was received and can be viewed on the inquiry publications page of the Committee's website.

- 1 38 Degrees (IOC0307)
- 2 ARLA Propertymark (IOC0275)
- 3 Ackland (IOC0161)
- 4 Adkins (IOC0037)
- 5 Alabare Christian Care & Support (IOC0202)
- 6 All Nottinghamshire local authorities (IOC0233)
- 7 All Souls Church (IOC0150)
- 8 Angel (IOC0038)
- 9 Anonymous (IOC0102)
- 10 Anonymous (IOC0097)
- 11 Anonymous (IOC0101)
- 12 Anonymous (IOC0046)
- 13 Anonymous (IOC0014)
- 14 Anonymous (IOC0015)
- 15 Antebi (IOC0263)
- 16 Arch, Miss Thea (IOC0073)
- 17 Association of Community Organisations for Reform Now (ACORN UK) (IOC0142)
- 18 Asylum Matters (IOC0304)
- 19 Atherton, Mr. Paul (IOC0252)
- 20 Atkins, Matt (IOC0255)
- 21 Baines (IOC0031)
- 22 Barden, Ms Vanessa (IOC0036)
- 23 Barker, Dr Stephanie (IOC0273)
- 24 Basildon Borough Council (IOC0239)
- 25 Bath & North East Somerset Council (IOC0231)
- 26 Beasley, Mr Liam (IOC0175)
- 27 Blumsohn, Dr Aubrey (IOC0280)
- 28 Boocock, Ms Demaine (IOC0129)
- 29 Breward (IOC0057)
- 30 Brighton & Hove City Council (IOC0241)
- 31 British Property Federation (BPF) (IOC0235)
- 32 Buckler (IOC0034)
- 33 Butler, Mr Josh (IOC0051)
- 34 Cardiff and Vale University Health Board (IOC0251)
- 35 Central Bedfordshire Council (IOC0278)

- 36 Centre for Homelessness Impact (IOC0223)
- 37 Centrepoint (IOC0058)
- 38 Changing Lives (IOC0197)
- 39 The Chartered Institute of Housing (IOC0160)
- 40 Citizens Advice (IOC0170)
- 41 City Of Bradford Metropolitan District Council (IOC0099)
- 42 Clenaghan, Mr Calum (IOC0077)
- 43 Clerke (IOC0094)
- 44 Coombs-Berry (IOC0089)
- 45 Cornwall Council (IOC0215)
- 46 Cornwall Residential Landlords Association (IOC0105)
- 47 Cosgrove, Ms Kathy (IOC0111)
- 48 Coventry Citizens Advice (IOC0133)
- 49 Coventry City Council (IOC0218)
- 50 Coventry Frontline Network (IOC0217)
- 51 Crampton Smith, Mr Mark (IOC0004)
- 52 Crisis (IOC0187)
- 53 Croydon, Mr Charles (IOC0116)
- 54 Cullerne Bown, Flora (IOC0148)
- 55 Cullum (IOC0061)
- 56 Deakin (IOC0118)
- 57 Devon County Council (IOC0173)
- 58 District Councils' Network (IOC0248)
- 59 Dogs Trust (IOC0179)
- 60 Drappier, Mr Boris (IOC0006)
- 61 Dunnett (IOC0156)
- 62 Eagleton, Mr Oliver (IOC0093)
- 63 East London Housing Partnership (IOC0306)
- 64 Essex, Mr. Rob (IOC0090)
- 65 Ethical Lettings (IOC0174)
- 66 Expert Link (IOC0184)
- 67 Faculty for Homeless and Inclusion Health (IOC0122)
- 68 Fair Housing Futures (IOC0224)
- 69 Fitzpatrick (IOC0052)
- 70 Fitzpatrick, Mr Oscar (IOC0048)
- 71 Forey (IOC0264)
- 72 Fraser, Ms E (IOC0069)
- 73 Friend, Mr Callum (IOC0078)

- 74 Fulfilling Lives South East (IOC0271)
- 75 Fuller (IOC0229)
- 76 Garden Court Chambers Housing Team (IOC0221)
- 77 Generation Rent (IOC0242)
- 78 Goodlord (IOC0211)
- 79 Graham (IOC0096)
- 80 Greater Manchester Combined Authority (IOC0283)
- 81 Greater Manchester Homelessness Action Network (IOC0143)
- 82 Griffiths (IOC0113)
- 83 Groundswell (IOC0300)
- 84 HFIS PLC t/a Hamilton Fraser (IOC0203)
- 85 Hackney Community Law Centre (IOC0209)
- 86 Halpin, Mr Kieran (IOC0098)
- 87 Hammersmith and Fulham Law Centre (IOC0298)
- 88 Hanson (IOC0166)
- 89 Haringey Migrant Support Centre (IOC0220)
- 90 Harrison, Mr Mark (IOC0250)
- 91 Harrow Council (IOC0301)
- 92 Hawes, Mr Nick (IOC0259)
- 93 Hayward, Mr Simon (IOC0152)
- 94 Henson, Mx Felix (IOC0075)
- 95 Higgs, Mr Don (IOC0012)
- 96 Hindosh, Mr Saad (IOC0281)
- 97 Hinson, Mr Tim (IOC0083)
- 98 Homeless Link (IOC0286)
- 99 Homes for Cathy (IOC0236)
- 100 Housing Law Practitioners Association (IOC0212)
- 101 Howarth (IOC0107)
- 102 Hughes, Miss Nancy (IOC0131)
- 103 Hughes-Evans (IOC0181)
- 104 Hunt, Mr Ed (IOC0249)
- 105 Hunters Group Plc (IOC0017)
- 106 Hunters Property Group Harrogate and Wetherby (IOC0021)
- 107 Jenkins, Mr (IOC0144)
- 108 Johnson, Mr Jake (IOC0059)
- 109 Joint Council for the Welfare of Immigrants (IOC0302)
- 110 Jones, Mr Thomas (IOC0124)
- 111 Just for Kids Law (IOC0207)

- 112 Justlife Foundation (IOC0238)
- 113 Kent Housing Group (IOC0230)
- 114 Kettlety, Ms Carys (IOC0044)
- 115 Key, Mr Daniel (IOC0028)
- 116 Khan, Mr T (IOC0265)
- 117 Kidd (IOC0042)
- 118 Kindersley, Dr Nicki (IOC0104)
- 119 Kingston Council (IOC0285)
- 120 Kirk, Mr Ken (IOC0026)
- 121 Kon (IOC0178)
- 122 Kutas, Mr David (IOC0272)
- 123 LENWELL PROPERTY SERVICES (IOC0204)
- 124 Labour Homelessness Campaign (IOC0260)
- 125 Lang, Mrs Sophie (IOC0295)
- 126 Large Agent Representation Group (IOC0159)
- 127 Lasenby, Mrs Sarah (IOC0115)
- 128 The Law Society of England and Wales (IOC0277)
- 129 Lear, Mr Ben (IOC0141)
- 130 Lester, Mr David (IOC0008)
- 131 Lewis, Mr P. (IOC0019)
- 132 Liverpool City Council, Knowsley Metropolitan Borough Council (MBC), Sefton MBC, Wirral MBC, St Helens MBC, and Halton MBC (IOC0196)
- 133 Liverpool Guild of Students (IOC0128)
- 134 Living Rent (IOC0140)
- 135 Llamau (IOC0158)
- 136 Local Government Association (IOC0165)
- 137 Lockwood (IOC0208)
- 138 Lodger Landlords Association (IOC0256)
- 139 London Borough of Barking & Dagenham (IOC0297)
- 140 London Borough of Camden (IOC0287)
- 141 London Borough of Enfield (IOC0194)
- 142 London Borough of Hackney (IOC0198)
- 143 London Borough of Hillingdon (IOC0180)
- 144 London Borough of Newham (IOC0246)
- 145 London Borough of Redbridge (IOC0253)
- 146 London Borough of Sutton (IOC0227)
- 147 London Borough of Tower Hamlets (IOC0245)
- 148 London Councils (IOC0171)

- 149 London Renters Union (IOC0153)
- 150 LSE London (IOC0313)
- 151 MCCarthy, Laura (IOC0001)
- 152 MEDACT (IOC0254)
- 153 MacTaggart, Ms L (IOC0055)
- 154 Macgregor-Fairlie, Mr Michael (IOC0022)
- 155 Magee (IOC0020)
- 156 Maguire, Dr Nick (IOC0273)
- 157 Making Every Adult Matter (IOC0291)
- 158 Matas (IOC0056)
- 159 Matuleviciute, Ms Guste (IOC0041)
- 160 Matusavage (IOC0060)
- 161 McCourt (IOC0039)
- 162 McDonnell, Miss Sabrina (IOC0074)
- 163 McKee, Dr Kim (IOC0123)
- 164 Mcgearty (IOC0149)
- 165 Metcalf, Mr Jack, Joseph (IOC0138)
- 166 Mid Sussex District Council (IOC0119)
- 167 Migrants Rights Network, and Just Fair (IOC0183)
- 168 Miller, Miss Kathy (IOC0005)
- 169 Mind (IOC0114)
- 170 Ministry of Housing, Communities and Local Government (IOC0308)
- 171 Mohammed, Mr Shabaaz (IOC0112)
- 172 Moore (IOC0049)
- 173 Munro, Dr Nell (IOC0226)
- 174 Museum of Homelessness, Streets Kitchen, The Outside Project, and The Magpie Project (IOC0145)
- 175 Musgrove, Ms Ellen (IOC0087)
- 176 NACCOM the No Accommodation Network (IOC0222)
- 177 NACRO (IOC0299)
- 178 NRPF Network, Islington Council (IOC0214)
- 179 National Housing Federation (IOC0137)
- 180 National Residential Landlords Association (IOC0127)
- 181 National Union of Students (IOC0106)
- 182 Nationwide Building Society (IOC0292)
- 183 The Nationwide Foundation (IOC0164)
- 184 Nesbitt (IOC0125)
- 185 New Economics Foundation (IOC0237)

- 186 New Hope (IOC0086)
- 187 New Horizon Youth Centre (IOC0305)
- 188 Noble, Mr David (IOC0010)
- 189 Nolan, Professor Aoife (IOC0226)
- 190 North London Housing Partnership, and Association of Housing Advice Services (IOC0176)
- 191 Northern Housing Consortium (IOC0201)
- 192 Nwogbo, Mr Johnbosco (IOC0053)
- 193 O'Donoghue, Select Committee Evidence on Homelessness and the Private Rented Sector Lauren (IOC0130)
- 194 Oakes-Monger (IOC0084)
- 195 Office of the Children's Commissioner for England (IOC0270)
- 196 Oxford City Council (IOC0279)
- 197 P.A.T.H. (Plymouth Access To Housing) Ltd (IOC0082)
- 198 Peaker (IOC0310)
- 199 Pettefar, Mr James (IOC0065)
- 200 Phizacklea-Cullen, Mr Jordan (IOC0095)
- 201 Phoenix Futures (IOC0192)
- 202 PlaceShapers (IOC0182)
- 203 Plymouth Alliance for Complex Needs, and Plymouth City Council (IOC0219)
- 204 Porchlight (IOC0177)
- 205 Possession Friend (IOC0146)
- 206 Private Rented Sector Professionals (IOC0240)
- 207 Procter and Co Limited (IOC0018)
- 208 Project 17 (IOC0135)
- Public Interest Law Centre (PILC), and Housing Action Southwark and Lambeth (HASL) (IOC0274)
- 210 R-Rouse, Rev (IOC0076)
- 211 Rapley, Mr Edward (IOC0027)
- 212 Rebecca (IOC0266)
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