

BROMSGROVE
DISTRICT COUNCIL

DRAFT TENANCY
STRATEGY
2012-2014

1. Introduction

- 1.1 The Localism Act places a duty on the Local Authority to prepare and publish a Tenancy Strategy by 15th January 2013. This Strategy has been developed for Bromsgrove District in its strategic role by working in close consultation with Registered Providers.
- 1.2 The Localism Act 2011 introduces a number of housing reforms including the ability for local authorities to grant fixed term tenancies, greater flexibility in the allocation of social housing and changes to legislation relating to homelessness.
- 1.3 The Localism Act (clause 126) will include new powers relating to allocations and flexible tenancies; it requires local authorities to produce a Tenancy Strategy that sits alongside the Housing Strategy, Homelessness Strategy and Allocations Policy.
- 1.4 Building on our strong and established working relationships within the District, this document has been developed collaboratively between the Council and registered providers and other key stakeholders.

2. Background Policy

2.1 The Government's key housing policy goal is to ensure that everyone has the opportunity of living in a decent home, which they can afford, in a community where they want to live. To achieve this, the Government is seeking to:

- Achieve a wide choice of high quality homes both affordable and market housing, to address the requirements of the community,
- Widen opportunities for home ownership and ensure high quality housing for those who cannot afford market housing, in particular those who are vulnerable or in need,
- Improve affordability across the housing market, including by increasing the supply of housing and;
- Create sustainable, inclusive, mixed communities in all areas, both urban and rural.

2.2 Definitions of Affordable Housing

National Planning Policy (June 2011) defines and includes 3 types of affordable housing:

- a) Social housing up until the introduction of affordable rents was the main model provided by Registered Providers (RP's) and refers to housing that is subject to strict rent controls, which are around 50% of the market rents.

- b) The new affordable rents which allow up to a maximum of 80% of market rent.
- c) Intermediate housing, which includes shared ownership.

It also states that affordable housing should:

- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices.
- Include provision for the home to remain at an affordable price for future eligible households or, if these restrictions are lifted, for the subsidy to be re-cycled for alternative affordable housing provision.

2.3 Delivery of New Homes

Alongside the requirements of the Localism Act the Homes and Communities Agency (HCA) is agreeing programmes for the delivery of new affordable housing from 2011 through to 2015 with Registered Providers and local authorities.

The level of subsidy provided by the HCA for new affordable homes has significantly reduced and the ability for RP's to deliver new homes with the reduced levels of grant has to be made up in the following ways.

- All new homes built with HCA subsidy are expected to be offered at affordable rents; up to 80% of the market rent.
- In addition RP's are offering to increase rents to Affordable Rent on a percentage of relet properties.
- They have also been encouraged to take a more pro-active approach to managing their stock, including the disposal of stock where this will bring funds to invest in new homes.

3. Aims and Scope of the Strategy

3.1 The aims and objectives of the Strategy are:

- To ensure that affordable housing meets local housing need
- To provide guidance and direction to RP partners in the development of their tenancy policies
- To provide a framework for up to date knowledge of the housing market in Bromsgrove that can then be used to inform policy and practice.
- To indicate to tenants and prospective tenants what they can expect from their tenancy.

The Strategy will provide guidance to RP's in the following areas:

- The kind of tenancies that they grant.
- The circumstances in which different tenancies should be granted.
- The length of fixed term tenancies.
- The criteria to consider when reviewing tenancies at the end of the fixed term.
- How disposals of stock should be managed.
- How Bromsgrove District Council will give consideration to new government guidance in relation to allocation of social housing.

The Tenancy Strategy relates to lettings to all social and affordable rented properties to include adapted and sheltered housing. It does not cover lettings to hostels, temporary accommodation or supported housing.

- 3.2 Although local authorities are not required to include an assessment of affordability in their Tenancy Strategy, Bromsgrove District Council recognises the importance of ensuring that affordable housing continues to be available and accessible to those who need it most and must therefore remain affordable, as defined locally.
- 3.3 The Strategy makes reference to the new power to discharge homelessness through the Private Rented Sector. The Council's Homelessness Policy sets out how the Council intends to maximise the use of the Private Rented sector in order to tackle homelessness.
- 3.4 This Strategy has been developed as a result of consultation with a range of partners and stakeholders, including RPs, Social Care, local councillors and voluntary and community organisations.

4. Bromsgrove District in Context



Bromsgrove District

- 4.4 Bromsgrove District is situated in North Worcestershire and covers approximately 21,700 hectares. Although located only 22km (14 miles) from the centre of Birmingham, the District is predominately rural with approximately 91% of the land designated as Green Belt.
- 4.5 The area is well served by motorways and benefits from train and bus connections into Birmingham City Centre and the wider region. The housing market is heavily influenced by Birmingham, with high inward migration from the conurbation.
- 4.6 The main centre of population in Bromsgrove District is Bromsgrove Town and other centres being Wythall, Hagley, Rubery, Alvechurch, Barnt Green and Catshill and a series of smaller rural villages spread throughout the District.

4.7 The Bromsgrove Vision

The vision of the Housing Strategy is

“The right home, at the right time, in the right place”

This means that we want every household in Bromsgrove to be able to access housing that suits their needs and circumstances when they need it. It is implicit in the vision that we want all housing to reach an appropriate standard, currently the Decent Homes Standard, and that the right home means one that is affordable to the household's budget. However, we do not mean that changing household circumstances should always result in the need to move home. Our vision embraces a much wider approach which always involves a housing options assessment to ensure household needs are met.

How our Housing Strategy Goals Link to Tenancy Strategy Issues & Outcomes

	Housing Strategy Goals	Key Strategic Issues
1	Better use of existing homes	Offering tenancies that meet the households needs but can be reviewed to ensure that best use of stock is achieved. Allocations Policy and Local Lettings Plans support move on opportunities. Fixed term tenancies can help achieve turnover in adapted properties where the adaptation is no longer required.
2	Deliver new housing	Support the development of new homes through affordable rents. Ensure that social rented accommodation is prioritised in new developments not subsidised by HCA.
3	Improve the condition of existing homes	Work with private landlords to achieve suitability standards to enable more housing pathways into the private rented sector.
4	Providing housing related support	Good housing options advice. Link the review of tenancies with support and tenancy sustainment, or pathways into alternative accommodation prioritising homelessness prevention. Make best use of new build opportunities by targeting specific groups ie; older people, lifetime homes, supported housing Monitor access to housing and tenancies by these groups – and

		monitor potential discrimination
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Housing is important to everybody and is essential to achieving a good quality of life. This may mean something different to each of us and may vary throughout our lives but generally involves a safe, secure and affordable home with the right support. It is true that many people are able to solve their own housing issues without help and support from councils and other agencies, but the Housing Strategy is about providing the right type of housing and support to those who need assistance.

5. Principles for Registered Providers on Tenancy Policy

- 5.1 This section will set out the principles that Bromsgrove District Council expects RPs to have regard to when developing their own tenancy policies.

Tenancy Types

Background Information

- 5.2 The Localism Act enables RPs to let properties to new tenants using fixed term tenancies rather than lifetime assured tenancies. Fixed term tenancies should usually be offered for a minimum of 5 years, unless there is a very exceptional reason to reduce the term to 2 years.
- 5.3 Fixed term tenancies can be offered at either social or affordable rent.
- 5.4 RPs are not obliged to offer fixed term tenancies. Lifetime tenancies can continue to be offered.
- 5.5 At the end of the fixed term, the RP will have the option to review the tenant's circumstances and the conduct of the tenancy and can either terminate or extend the tenancy. RPs are required to develop and publish a Tenancy Policy and the criteria to be taken into account when deciding whether to provide a fixed term tenancy or not and whether to extend or terminate a fixed term tenancy should be clearly set out in this policy.
- 5.6 Where an RP chooses to terminate a fixed term tenancy at the end of the period, the RP must give notice of their decision 6 months before the end of the tenancy and must also ensure that the tenant is provided with advice and assistance in finding suitable alternative accommodation to ensure that they do not become homeless.
- 5.7 Existing allocation and nomination arrangements will continue, with properties offered on fixed term tenancies being advertised and let through existing schemes, e.g. choice based lettings schemes.
- 5.8 RPs will continue to be able to offer introductory tenancies.
- 5.9 Existing tenants will retain their security of tenure whether they remain in their current home or transfer to another social rent property. However, their security of tenure may change if they move to a property which the RP has chosen to let at affordable rent levels.

Bromsgrove District Principles

- 5.10 The local authority welcomes the introduction of fixed term tenancies as a means of ensuring that best possible use is made of the limited social housing stock in the District. However, it is essential that the use of fixed term tenancies should not undermine the sustainability of communities and neighbourhoods and care must therefore be taken in determining in what circumstances such tenancies will be offered and what review criteria will be applied at the end of the tenancy.
- 5.11 The Council considers that, where flexible tenures are to be used, they should be generally offered for a minimum of five years in order to provide stability and security and only in exceptional circumstances offered for the minimum 2 year period. An example of this would be where a homeless household eligible for the full re-housing duty is expecting significant equity due to the sale of their property where the release of this equity would enable them to secure a property on the open market or become eligible for a low cost housing product.
- 5.12 It is also expected that unless there has been a significant change in circumstances following a review, the tenancy will be renewed for a further period. RP's should ensure that they clearly publish the criteria and conditions they intend to apply to the allocation and review of fixed term tenancies and that this information should be provided to tenants prior to their tenancy commencement. RPs should also make clear whether they intend to terminate fixed term tenancies if any or all of the specified conditions are met and in what circumstances they will renew a tenancy even though some or all of the conditions are met.

Overcrowding and Under-occupation

- 5.13 Bromsgrove District Council expects landlords to take positive action to facilitate a move to more suitable accommodation where tenants' circumstances change and their current home is too large or indeed where the accommodation is too small.
- 5.14 The proposed housing benefit restrictions on bedroom size being applied from April 2013 for working age households will add further pressure to ensure that properties are not under occupied. Those who are underoccupying their social housing will be placed into a reasonable preference banding on Home Choice Plus if they make an application to transfer to a smaller property.
- 5.15 The Home Choice Plus Allocations Policy also awards reasonable preference to families who are overcrowded.

Properties with Adaptations

- 5.16 It is important that properties with adaptations are used appropriately due to the limited resources available to meet a growing need for adapted properties. Bromsgrove District has a significant number of older residents and this figure is projected to increase. It is therefore important to ensure that if the circumstances or needs of a tenant with an adapted property change, meaning that they no longer require a property with an adaptation then the tenant will be moved to a more suitable property. The adapted property should then be allocated to someone requiring such an adaptation.

- 5.17 The Home Choice Plus Allocation Policy gives reasonable preference to households occupying an adapted property and wishing to move to a more suitable property.
- 5.18 Bromsgrove District Council expects RPs to consider the following factors in determining the criteria to be used for allocating and reviewing fixed term tenancies:
- Due to the shortage of social housing in the District, the Council supports the use of fixed term tenancies for properties with two or more bedrooms in order to ensure that this scarce resource can be used most effectively.
 - In order to ensure the best possible use of stock, the Council supports the use of fixed term tenancies for properties with specialist adaptations.
 - The Council considers that all fixed term tenancies should be renewed unless the household's circumstances have changed to such an extent that the property is no longer suitable for their needs, or they are able to meet their needs through market tenure housing. Examples of this include:
 - The household income or savings exceeds the thresholds specified by the Home Choice Plus allocations policy. This currently stands at income of over £60,000 per annum and/or savings/assets/equity exceeding £50,000 (unless their needs can only be met through housing that is not available as a market tenure)
 - The household is under-occupying their property, particularly in the case of family housing.
 - There have been repeated serious breaches of the tenancy conditions set out at the commencement of the tenancy, and appropriate support has been offered to the tenant to address these breaches, but there has been a consistent failure on the part of the tenant to do so. In the case of rent arrears, the RP should take into account where arrears have accrued as a result of welfare reform. In these circumstances, the Council expects an RP to be flexible in its approach and to assist tenants to find more affordable accommodation within its own stock.
 - Where a tenancy is not renewed at the end of a fixed term, the RP should ensure that adequate and appropriate advice and assistance is provided to the tenant to enable them to secure alternative accommodation. This may include assisting them to move within the RP's own stock (either rented or shared ownership) or moving into a market tenure. The tenant should be given a notice period of at least 6 months and the RP should also notify the Council's Housing Options Team of any intended tenancy terminations that may lead to homelessness as soon as notice is given.

- The Council expects that very few, if any, homeless approaches should be generated by an RP terminating a fixed term tenancy, as appropriate advice should have been provided to the tenant. Where a former tenant does approach the Council for homeless assistance, the RP should assist the Council with its enquiries where requested.
- In most cases (unless the property conditions would make it unsuitable), the Council expects that RPs should allow the tenant to remain in their property at the end of a tenancy for a maximum of six months or until a suitable alternative has been found, whichever is the earlier.
- RPs should ensure that tenants are provided with clear and adequate information about the reasons why their tenancy has been terminated, and clear guidance should be provided on the way in which they can request a review of any decision to seek possession.
- Where a household is found to be significantly over-crowded at the time of a fixed term tenancy review and the household does not meet any of the other criteria for tenancy termination, the Council expects that the RP should assist the household to find suitable alternative accommodation within its own stock.

Affordable Rent

Background Information

- 5.19 The new tenure of affordable rent was introduced in 2010 following the Comprehensive Spending Review and enables RPs who have entered into a contract with the Homes and Communities Agency to charge rents of up to 80% of market rent levels on all new build properties funded through the 2011-15 HCA programme. These RPs may also convert a proportion of their existing properties to affordable rent.
- 5.20 RPs not in receipt of HCA development funding must continue to let properties at social rent levels. RPs in receipt of funding will also be able to continue charging social rent on existing properties if they choose to.
- 5.21 Existing tenants remaining in the same home will not be affected by this change. However, they may be affected if they transfer to a new home.
- 5.22 Properties at affordable rent levels will continue to be eligible for Housing Benefit rather than Local Housing Allowance.
- 5.23 Existing allocation and nomination arrangements will continue, with properties offered at affordable rent being advertised and let through existing schemes, e.g. choice based lettings schemes.

Bromsgrove Principles

- 5.24 The Bromsgrove Council expects RPs to take into consideration the affordability calculations included in the Worcestershire Strategic Housing Market Assessment and the specific demographics of its operating area in determining the rent levels to set and the proportion of its existing stock that it will convert to affordable rent. RPs should also take into account the availability of affordable and market accommodation in specific areas and the need to ensure sustainable communities in determining rent levels – e.g. some rural areas may have very limited affordable housing stock and introducing affordable rent in these areas may make the stock unaffordable to the majority of local people.
- 5.25 It is recognised that affordable rent will meet the needs of some of those in housing need in the District. However, it is more likely that this product will assist the wider housing waiting list as opposed to those in significant need, who are likely to have fewer resources available to them. This is because although households in properties charged at affordable rent levels will be eligible for housing benefit, those households on a low income and not in receipt of housing benefit may struggle to afford these rent levels. The Government is keen that benefit dependence and worklessness levels should be reduced and it is therefore also vital that rent levels should not act as a barrier or disincentive to entering employment. In addition, when the Benefit Cap of £26,000 is introduced in April 2013, households may struggle to afford the affordable rent levels; in Bromsgrove, this is particularly true of larger family sized accommodation (3 and 4+ bedroom properties).
- 5.26 Although Bromsgrove Council must consider the whole housing market and ensure the needs of all households are provided for, the conversion of social rent properties to affordable rent which are then let to households not in significant need will not serve to reduce the affordable housing requirement for the Council, in fact it will increase it.
- 5.27 The Council therefore expects RPs to carefully consider the affordability of its stock for local people when determining which properties should be converted to affordable rent and, as a minimum, expects that RPs should not convert existing 4+ bedroom properties to affordable rent.
- 5.28 The Council expects that RPs should publish its criteria for determining which of its existing stock it intends to let at affordable rent levels and should also publish the valuation information it uses to determine the affordable rent level.
- 5.29 The Council expects that in all cases the affordable rent level should be lower than the local housing allowance level for the District.
- 5.30 The Council expects that RPs will provide its tenants who are likely to be affected by changes to welfare benefits with appropriate advice regarding how it will impact them and how they can address any resulting affordability issues.
- 5.31 The Council expects that all affordable rent properties should be advertised through the Home Choice Plus choice based lettings scheme and that the rent level should be clearly indicated on the advert. The RP should also ensure at the allocation stage that the

tenant understands the difference in the rent level prior to them making a decision regarding whether to accept the property.

Section 106 developments

- 5.32 Due to the large differential between social and affordable rent in the District, the Council considers that there is still a significant requirement for the delivery of new build properties at social rent. The Council will therefore continue to seek social rented housing on sites where affordable housing is secured through a Section 106 agreement.
- 5.33 The Council also expects that all properties subject to existing Section 106 agreements should continue to be offered at social rent levels and not be converted to affordable rent. The Council will monitor allocations of properties subject to a Section 106 agreement to ensure that they are offered at the correct rent levels.

Mobility in Social Housing

Background Information

- 5.34 The Localism Act promotes mobility in social housing. All RPs are obliged to participate in a mutual exchange scheme to allow tenants to move more easily.

Bromsgrove Principles

- 5.35 Bromsgrove District Council recognises the need for tenants to be able to move to be closer to work or family support and supports the Government's efforts to facilitate easier movement within the sector.
- 5.36 Applicants are able to apply to Home Choice Plus from anywhere within the United Kingdom. However, in order to ensure that Home Choice Plus meets the needs of the local community, reduced priority will be given to those applicants without a Local Connection to Bromsgrove District.
- 5.37 Local connection will be assessed having regard to the definition of local connection contained in Section 199 Housing Act 1996.
- 5.38 The following factors as set out in s199 Housing Act 1996 will be taken into consideration in determining whether or not an applicant has a local connection with Bromsgrove District. An application is awarded a local connection if an applicant or a member of their household included in their application:
- has lived in Bromsgrove District by choice for a certain time (usually for six months out of the last 12 months or for three years out of the last five years);
 - has close family living in Bromsgrove District, who have been permanently resident for at least the previous five years;

- has permanent employment in Bromsgrove District
 - has special circumstances that give rise to a local connection
- 5.39 In determining permanent employment the policy gives consideration to the Local Government Association guidelines which state that this is employment other than that of a casual nature.
- 5.40 For the purposes of determining Local Connection, living in Bromsgrove District will not include the following:
- Occupation of a mobile home, caravan or motor caravan where it is not their only or principal home
 - Occupation of a holiday letting (which includes a permanent building, hotel or bed and breakfast accommodation) for the purposes of a holiday.
 - Resident of a HMP, Bail Hostel or other such accommodation.
 - In-Patient of Hospitals/specialist centres
- 5.41 The Council expects that all RPs operating in the District should participate in a national mutual exchange scheme to enable tenants to move more easily, e.g. Homeswapper In order to encourage and facilitate mobility. The Council also expects that existing social tenants should be allowed to retain their security when they move to a new property.
- 5.42 The Council expects that RPs should publish a mutual exchange policy, setting out any conditions it may apply to tenants who wish to exchange.
- 5.43 The Council expects RPs to offer flexibility in allowing exchanges and to clearly explain how tenants' exchange rights will be affected by different tenancy types, including fixed term and introductory tenancies. The Council also expects RPs to offer flexibility to tenants who need to move because they are under-occupying their current home and have faced a reduction in Housing Benefit as a result. This may mean relaxing conditions around the ability to exchange with rent arrears, if this will resolve the household's affordability issues and prevent further arrears from accruing.

Disposal of Stock

Bromsgrove District Principles

- 5.44 Bromsgrove Council does not wish to see the disposal of housing stock. However, it is recognised that in certain circumstances this may be justifiable providing it allows for future investment within the District in providing more appropriate housing. Agreement will have to be gained from the Council for any disposal of stock in accordance with legislative requirements and stock transfer agreements. This would include any payment in respect of the disposals claw back agreement.
- 5.45 The Council expects that RPs should have a disposal strategy which clearly sets out their approach to the disposal of stock and how this benefits the organisation and the local authority area(s) in which it operates. The Council also expects that all disposal decisions should

be taken at RP Board level. If RPs wish to dispose of stock within Bromsgrove District, the Council will require them to provide the following information to the Strategic Housing Manager with any request for support for disposal:

- Address of property
- Type and size of property
- Whether the property is currently tenanted and if so, how the current tenant will be assisted to find suitable alternative accommodation
- The projected income from the disposal
- How and where this income will be used

Local Lettings Plans

Bromsgrove District Principles

- 5.46 Local Lettings Plans are currently used in order to facilitate community sustainability and good housing management. Local Lettings Plans may be used by RPs in some areas to set out how and why particular properties will be let at affordable rent levels or offered on a fixed term basis.
- 5.47 Local Lettings Plans should always be developed in partnership with the Council.
- 5.48 All local lettings plans should be need based and have clear and robust evidence to support this need. The plan should clearly set out what the RP is aiming to achieve in applying restrictions on allocations and how these restrictions will assist to meet these objectives. The plan should also have a set review date, at which time, the RP should assess whether the objectives have been achieved and whether the plan should be extended or amended.
- 5.49 All local lettings plans should be published by the RP and should also be agreed by the Council before use. The Council will publish all local lettings plans on the Home Choice Plus website and any advert which restricts allocations based on a local lettings plans should clearly reference the title of the plan in order that customers are able to make informed choices about their bidding.

6. Social Housing Allocations

- 6.1 Bromsgrove District Council operates a choice based lettings (CBL) scheme to determine how priority should be awarded in the allocation of social housing in partnership with five other local authorities. The sub-regional CBL scheme is called Home Choice Plus.
- 6.2 The Localism Act 2011 offers local authorities greater freedom in framing their allocations policies which:
- Allows them to restrict access to waiting lists

- Make it easier for existing social tenants to move to more suitable accommodation
- Allows local authorities to set local qualification categories subject to the overall scheme meeting the needs of those in reasonable preference. Positive qualification criteria might be applied to economically active households and those who contribute to their communities.
- Ensuring that former Service men and women who have urgent housing needs are given 'additional preference' (i.e. high priority) for social housing

6.3 The Government's statutory guidance was published on the 29th June 2012 and a further review of the allocations policy will be undertaken to consider this guidance and what additional changes might be made.

7. Use of Private Rented Sector Tenancies

7.1 Local Authorities will be able to discharge their duty to homeless households with an offer of suitable accommodation in the private rented sector provided the tenancy is for a minimum of one year and is suitable for the household. The Government is developing new guidance on assessing suitability to accompany this new power.

Bromsgrove Principles

7.2 The private rented sector in the District is complex and differs in availability and affordability between different areas. Market research undertaken as part of the Worcestershire SHMA 2012 highlighted a trend of a lettings market restricted by the lack of available property due to both the withdrawal of the buy to let investor from the market and the growing trend for people to remain within their rental property for increasing amounts of time.

7.3 This market research further identified the following district specific trends in Bromsgrove:

- the lettings market remains buoyant with 3 bedroom houses with gardens being in particular demand. Flats are less popular and there is a high turnover rate associated with this property type. There is high demand throughout Bromsgrove and areas close to transport hubs are always popular.

7.4 The Council funds the Step Up and MyPlace private rental sector (PRS) access schemes to facilitate households to enter this tenure and reduce the demand on social housing. There are also various schemes offered by partner and voluntary agencies across Worcestershire, providing PRS access services to specific client groups such as single homeless people and ex-offenders. The Council is working on how more properties could be made available in the Private Rented Sector and how this sector could be better utilised to offer a suitable alternative tenure for those households who would traditionally have

entered social housing. The use of the private rented sector will, however, be determined by the local market.

- 7.5 Bromsgrove District Council regulates the licensing of 3 storey Houses in Multiple Occupation and licenses are granted to properties achieving the required standards.
- 7.5 The current rent bond scheme operated by the Council is prioritised to assist customers who are at risk or threatened with homelessness regardless of their priority need. However, in consideration of the Homelessness provisions within the Localism Act 2011 the Council has developed a Homelessness policy which sets out how the private sector might be utilised in Bromsgrove to provide accommodation that is suitable and appropriate to meet the needs of homeless households and discharge the homeless duty.
- 7.6 Any use of the private rented sector in this way will always involve a rigorous assessment of the suitability of this option, including an assessment of affordability, and the Council will only exercise this power where it considers that the private rented sector represents an appropriate solution to a household's housing need. Any decision to discharge duty in this way will be subject to the usual homeless appeal process. The use of this power will be closely monitored to ensure that private rented sector tenancies can be sustained over a medium to long term and do not result in repeat homelessness.
- 7.7 All properties let through the Council's private rented sector access schemes must be in good repair, warm, secure and free from health and safety hazards. The rent charged should also be at or below local housing allowance levels for the District. Where rent charged exceeds local housing allowance, the Council's agent must be satisfied that the property is affordable for the tenant and that any top up is reasonable.

8. Governance

- 8.1 The Tenancy Strategy and principles will be reviewed annually by the Homelessness Strategy Steering Group to ensure that it remains consistent with the allocations policy and relevant strategies.
- 8.2 The individual RP's are responsible for their individual tenancy policies which will be published to provide transparency, enabling local communities to understand clearly how social landlords are responding to local needs and priorities.

9. Legislation

- 9.1 In addition to the Localism Act 2011, Bromsgrove District Council expects Registered Providers to have regard to the Welfare Reform Act 2012, the Equalities Act 2010, Human Rights Act 1998, Articles 6 & 8 of the European Convention on Human Rights and any other relevant legislation in framing their tenancy policies.

10. Consultation

- 10.1 This draft strategy will be subject to a consultation period running from 2nd August 2012 until 14th September 2012. Relevant partners, stakeholders and housing applicants will be included in this consultation process and their feedback will be used to develop the final strategy.