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Publications —— Spring 2017

Housing Litigation Update

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Foreword

Welcome to the spring 2017 edition of Housing Litigation update.

We begin by looking at anti-social behaviour, and in particular, the Government's review of guidance for social landlord practitioners tasked with tackling it.

Focus then moves to the private rented sector, with an interesting look at the potential for landlords or letting agents being subject to discrimination claims for refusing to accept applications from people in receipt of benefits.

Next, we look at a case dealing with sentencing (in particular, suspended sentences) for contempt of court for breach of Injunction.

The cyclical issue of the validity of Notices follows, with a look at a case involving the termination of an introductory tenancy, and whether information contained within another document, but which was served with the Notice, functioned together in order to comply with the Notice requirements.

Our next two articles consider decisions from the Court of Appeal on two quite discrete areas of law. Firstly, what is 'reasonable notice' in the context of excluded licences. Secondly, the recoverability via a service charge of costs of improvements. In both cases the Court of Appeal provides some helpful guidance that practitioners in these areas should familiarise themselves with.

We then focus on the perennial issue of occupation as only or principal home (or not, as the case may be). Whilst this decision reiterates that each case will be taken on its own facts, it is also a useful reminder that evidence must be gathered that deals with the tenant's intentionality.

We round off this edition with a look at a case involving the Public Sector Equality Duty in the context of suitability of accommodation offered to applicants under homelessness legislation.

We hope that you find this edition of interest and value. We always welcome any feedback and suggestions for future articles so please feel free to email us at hlu@trowers.com with any comments.

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Government review of ASB guidance – Crystal ball gazing for social landlords

On 22 February 2017, the Aster Group (Aster) came under the spotlight during a debate in the House of Commons, where it was heavily criticised for having failed to take action to tackle one of its households allegedly responsible for anti-social behaviour (ASB) targeted at a neighbouring private owner occupier. By reference to Hansard, it is clear Aster was made a scapegoat for the apparent 'failings' of social landlords to deal with a minority of anti-social tenants. Further, the MP that tabled the debate, Simon Hoare, argued social landlords should owe a duty of care towards victims, where the ASB was caused by their tenants – even going so far as to suggest social landlords should be required to financially compensate victims.

Whilst the specifics of the case were not provided, it was reported Aster was unable to take enforcement action (presumably in the form of a civil injunction) to address the ASB in question because the complainant had not been willing to give evidence in support of such action. In response to this, Andrew Percy (the clearly well informed) junior minister at DCLG rightly confirmed that hearsay or professional evidence could have been used by Aster in order to progress court proceedings against the problem household.

In response to the concerns raised during the debate, Andrew Percy gave recognition to the frustrations of victims of ASB, and of how slow and complex the process of eviction can be. In addition to demonstrating a good understanding of some of the tools available for tackling ASB, he gave assurances the Government is currently reviewing the statutory guidance to frontline professionals on the use of the powers for tackling ASB and that it was likely refreshed guidance, also addressing some of the issues raised in the Aster debate, would be published by spring 2017.

So, what might the Government look to change as part of this review?

It is unlikely the review will propose the introduction of any new tools for tackling ASB, or, given that such problem households are a minority, to implement a wholescale reduction in the security of tenure for social housing tenants so that social landlords could always recover possession using the mandatory route. The latter would be punishing the majority of well-behaved tenants for the actions of a few. It is however more likely the review will look at ways to speed up the process for recovering possession, and to expand on the guidance for taking action where complainants are unable or unwilling (for fear of reprisals or repercussions) to give named evidence.

In respect of speeding up the process for recovering possession, it is difficult to see how this could be achieved given that there is already in place a range of mandatory possession options designed to (where appropriate) expedite the process. Often the delays are caused not by social landlords failing to act in a timely manner, but by a number of other factors beyond a social landlord's control, such as over stretched county court diaries and staff, the reduction of Legal Aid advisers in certain areas and broader funding cuts, increased mental capacity issues with defendants, disclosure requests being delayed or declined (often by the police), the civil procedure possession process requiring certain steps or timescales to be provided, or in fact the need for the process to properly balance the rights of a tenant to defend the allegations against them.

Given the significant implications for social landlords, and the body of sound and logical case law on the point, it is also unlikely the

Government will look to directly impose a broader duty of care on social landlords for the actions of their tenants, as has been called for by Simon Hoare. It is however more likely the review will look at ways of encouraging greater use of the Community Trigger, by increasing publicity of this under-used tool; and also perhaps at ways of increasing its efficacy by fine tuning this measure to include social housing providers in the list of relevant bodies involved in a case review (rather than them only participating if co-opted), and introducing mechanisms for compelling agencies to take action. It is unclear what form such mechanisms may take, however it would not be inconceivable to see the ability for other agencies (or even possibly victims) to take enforcement action to put a stop to the ASB and nuisance, and to then be able to recover the costs of such action from the social landlord in question.

In undertaking this review the Government should not overlook the fact that the vast majority of social landlords do an extremely good job in tackling complex ASB with ever dwindling resources, and by working closely with other agencies. Any changes that are introduced should be designed to enable social landlords to do the good work that they do more easily, rather than punishing them for the limitations of the processes they are required to follow.

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How long before the private rented sector faces a discrimination claim?

A large percentage of tenants in the social housing sector are in receipt of housing related benefits to assist them with the payment of their rent. However, in the private rented sector, the percentage of such tenants is lower as many private landlords and letting agents openly advertise they do not accept claimants who are in receipt of housing related benefits.

Thankfully, long gone are the days when it was all too common to see signs in the windows of landlords and letting agents saying "no blacks, no Irish, no dogs". Although, increasingly, private landlords and letting agents advertise that they do not accept benefit claimants, pets or children.

With the demand for social housing substantially outweighing supply, many people have little alternative but to seek accommodation in the private rented sector. Often such people are working but are "just about managing" and receive some form of housing related benefit which contributes towards the payment of their rent. However, is it fair that they, along with those who use housing related benefits to pay the whole of their rent, should be prevented from accessing accommodation of their choosing? All too often as a result of this stance taken by private landlords and letting agents these individuals are restricted in the type of accommodation they have access to and as such it is unlikely to be too long before this type of refusal is challenged through the courts.

In the face of such challenge, private landlords are likely to argue they are not discriminating against any proportion of society as:

1. they are free to let their properties to whomever they like; and

2. the terms of their buy-to-let mortgage may prevent them from granting tenancies to claimants of housing related benefits. Presumably this is because lenders are concerned there is an increased risk of borrowers defaulting on their mortgages due to the way in which housing related benefits are paid (i.e. in arrears in respect of housing benefit or the risk of recipients of Universal Credit not passing the housing element of their benefit on to their landlords).

In the House of Commons briefing paper dated 1 November 2016 entitled "Can private landlords refuse to let to housing benefit claimants?" this very issue is considered in detail.

The refusal of private landlords to let their properties to housing benefit claimants does not amount to direct discrimination as income status is not a protected characteristic under the Equality Act 2010. However, there is an argument that such refusal may amount to 'indirect discrimination' due to a high proportion of housing benefit claimants being female and/or from an ethnic minority group. Indirect discrimination takes place where a policy, which itself may not be discriminatory, has the potential to impact disproportionately on people who are protected under the Equality Act 2010. However, it should be noted that indirect discrimination may be lawful if it can be reasonably justified.

For landlords, such justification may be easier to argue where their mortgage provider has specified they cannot let a property subject to a mortgage to housing benefit claimants. However, such an argument will clearly be much more difficult for a landlord with a property which is free of a mortgage. Further consideration should be given to what justification arguments may be open to letting agents.

Of course not all private landlords refuse to let to claimants who are in receipt of housing related benefits however, is it fair that the proportion of properties such claimants have to choose from is reduced or not in an area they would like to live as a result?

If a tenant were to win such a challenge in the courts it is likely to act as yet another deterrent, on top of the increasing amounts of regulation and financial penalties, faced by private landlords thinking of entering or remaining in the private rented sector.

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Contempt of court and sentencing

In the case of *Jerome Christie v Birmingham City Council – 14 December 2016* Birmingham City Council commenced injunction proceedings against 18 individuals, one of whom was Jerome Christie (Christie) under Section 34 of the Policing and Crime Act 2009, to prevent gang related violence. It was alleged that Christie was a member of one of two street gangs carrying out armed feuds with each other on the streets of Birmingham. A trial was scheduled for January 2017.

On 15 February 2016 a Circuit Judge granted Birmingham City Council 18 interim injunctions. The terms of Christie's Injunction prevented him, until further order, from possessing drugs, from associating with certain people and from entering certain areas of Birmingham. A trial was scheduled for January 2017.

On 26 February 2016 Christie was arrested and brought before a Circuit Judge for breach of the interim injunction after he was seen driving in the exclusion zone and being found in possession of cannabis. Christie denied being in the prohibited area and the proceedings were adjourned until 22 March 2016. Christie was remanded on bail in the meantime.

On 17 March 2016 Christie was arrested again for a further breach of the interim injunction having once more entered the exclusion zone. The hearing was adjourned so that both breaches could be dealt with on 22 March 2016.

On 22 March 2016 Christie admitted the first breach but denied the second. His Honour Judge McKenna heard oral evidence from Christie and a Police Officer who gave evidence to the effect that she had seen Christie in a stationary car within the exclusion zone. The Judge therefore found the second breach proved and Christie was sentenced to 28 days imprisonment for the first breach and 56 days for the second breach, with both sentences to run concurrently. The sentence was however suspended until "the expiry of the current injunction or any further order" and was not to be enforced if during that time Christie complied with the Injunction.

Christie appealed to the Court of Appeal arguing that:

- The committal order had been made unlawfully because by virtue of Section 14(1) Contempt of Court Act 1981 it was wrong for His Honour Judge McKenna to suspend the term of imprisonment until the expiry of the injunction or any further order and that any suspension must be for no longer than two years, or if that were wrong, a fixed period of time. That section essentially states that where a court has the power to commit a person to prison for contempt of court then the term shall not exceed two years in the case of committal "by a superior Court", or one month in the case of committal by "an inferior Court."

- There had been insufficient evidence to find that he had been in the exclusion zone because the vehicle he was allegedly driving had tinted windows and the Police Officer could therefore have been mistaken.

- The sentence was excessive and disproportionate having regard to the facts of the case.

Christie's appeal was subsequently dismissed and the Court of Appeal held that:

- Christie had confused the provision where a period of imprisonment could not exceed two years rather than the period of a suspension. The period of

the suspension was not limited to two years. Section 14(1) of the 1981 Act referred to the period of time for which the committal could be ordered and did not apply to the period for which it could be suspended. Furthermore, the Court had the power to suspend a committal order for an indefinite period (although in most circumstances it may not be appropriate to do so following the decision in *Griffin v Griffin* [2000] 2 FLR44, CA.)

- His Honour Judge McKenna had been entitled to find the Police Officer's evidence persuasive. In addition there was other compelling evidence that Christie's friend had owned the car, Christie could not say where he had been on the day in question, the car had previously been parked outside Christie's property and the car keys were found in Christie's home.

- Finally, in determining the period of imprisonment His Honour Judge McKenna had a duty to protect the public and a total of 56 days imprisonment for repeated breach of the injunction was not excessive.

The Court of Appeal agreed that where a committal order is suspended for breach of an interim injunction that it must be made explicit when that suspension will come to an end. In this case the Court of Appeal found that since Christie would know when the injunction had come to an end this was sufficient clarity for him.

This case confirms that robust committal orders will not be overturned by the Court of Appeal.

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Validity of notice served on introductory tenant

In *Mayor and Burgess of the London Borough of Islington v Raymond Dyer* [2017] EWCA Civ 15, Mr Dyer appealed against a possession order made in relation to his introductory tenancy.

The purpose of introductory tenancies is to provide a trial period during which the landlord may terminate a tenancy without having to establish the grounds for possession which would be required were the tenancy is a secure tenancy. This is particularly key for local authority landlords where there may be a background of historic anti-social behaviour. Normally the trial period is for one year but this can be extended by a further six months in accordance with s125 and s125A of the Housing Act 1996 (the Act).

Notwithstanding that the statutory grounds for possession do not need to be satisfied, the tenant is afforded an element of protection by virtue of s128 of the Act, which deals with the notice requirements.

In this case, Mr Dyer was served with notice on 18 November 2013, giving 23 December 2013 as the date after which proceedings would begin. In accordance with s129 of the Act Mr Dyer requested a review of the decision to serve the notice but he failed to attend the review meeting. The meeting continued on the basis of the documentation alone. The local authority confirmed its earlier decision and possession proceedings were issued on 1 February 2014.

Mr Dyer appealed against the validity of the notice on the basis that the notice did not contain the required statement informing him of his right to obtain advice from the Citizens' Advice Bureau (or similar). An information leaflet containing such information had however been served with the notice.

As there was no prescribed form for a s128 notice, the starting point for the court was whether the document that was served could be reasonably described as a notice in compliance with s128.

The District Judge rejected Mr Dyer's argument and made an order for possession. Mr Dyer was given permission to appeal the decision as was the local authority because the circumstances and issues raised had a wider application.

The Court of Appeal accepted that the two documents, namely the notice and the information leaflet, although technically separate, functioned together and could therefore be treated as one for the purpose of satisfying the requirements ofs128. The information leaflet was treated as part of the notice in this instance because the reasonable recipient would have understood that they were intended to be read together.

The case highlights that local authorities must be able to prove that they have complied with the mandatory requirements of s128 of the Act.

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Reasonable notice and excluded licences

In the recent case of *Thomas Gibson v Ian Douglas and Another* [2016] EWCA Civ 1266, the Court of Appeal considered whether the Appellant, Mr Gibson, had a right to claim damages against Ian Douglas, and his mother Mrs Douglas, in respect of a claim for unlawful eviction. However, the observations on the question of what termination notice period an excluded licensee is entitled to are of more interest.

Insofar as the decision in the case is concerned, it is sufficient to say that the appeal by Mr Gibson failed.

However, the Court of Appeal then went on to make some helpful observations in respect of notice requirements for licences excluded from protection under the Protection from Eviction Act 1977:

"Leaving on one side the question of whether notice, written or oral, is required to terminate a licence … it is clear law that, where the relevant period has not been specified by the licence itself, a licensee is entitled, following revocation of the licence, to whatever in all the circumstances is a reasonable time to remove himself and his possessions: see Minister of Health v Bellotti [1944] KB 928… [It] is impossible to define the principle with any greater precision and undesirable that we attempt to do so."

The Court of Appeal confirmed it was clear law that an excluded licensee is usually entitled to reasonable notice before being compelled to leave a property. In the absence of contractually specified periods, there was a spectrum of notice periods which could apply depending on the nature of the licence, and that these ranged from minutes where, for example an unwanted visitor presents himself at the front door, to years where, for example, a licensee has occupied premises for 10 years.

In the case before the court, where the licensee had occupied the premises for about five years, the court doubted the period could be measured in minutes, hours or days but thought weeks rather than months or years would be more appropriate.

This case provides interesting observations on the approach to take when deciding what a "reasonable" notice period could be for an excluded licensee. It also serves as a reminder that a notice period should be specified where possible in order to give certainty and to hopefully avoid litigation on that point.

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Service charges reasonably incurred?

In the *London Borough of Hounslow v Waaler* [2017] EWCA Civ 45 the court considered how they assess whether costs have been 'reasonably incurred' when determining the amount of service charge which is payable pursuant to s19 (1) (a) of the Landlord and Tenant Act 1985 (the Act).

The case comes after the local authority appealed against an Upper Tribunal decision that the replacement of windows and cladding did not give rise to a recoverable service charge.

The issue in this case was whether the costs of the works were 'reasonably incurred' and whether the Upper Tribunal had applied different tests in assessing the reasonableness of the costs of repairs as against improvements.

The tenant was a long lessee and was obliged to pay a service charge covering the costs of repairing the property. Under the terms of the lease, the tenant was also obliged to pay a proportion of any improvements made.

A notice of intention was served by the local authority, which itemised the replacement of a flat roof with a pitched roof and the replacement of wooden framed windows with their metal counterparts. The works also required further external cladding and asbestos removal works.

The Upper Tribunal determined that the roof gave rise to a recoverable service charge but the window and cladding works did not, concluding that these works amounted to improvements.

The appeal was dismissed and it was found that the Upper Tribunal had made no error in law. In line with the Court of Appeal's reasoning, we suggest that there are three factors which landlords should consider:

1. The extent of the interests of the lessees: – this is easily determined by virtue of the remaining unexpired terms of the leases;

2. The views of the tenants: – although a landlord is not bound by any views, more weight should be placed upon such views when considering whether to carry out discretionary works;

3. The financial impact of any works: – this appears to be a common sense approach in that lessees of an affluent block are more likely to be able to meet a larger bill than others may be.

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Occupation of property as only or principal home

On 15 March 2017 the Court of Appeal handed down judgment in the case of *Evelyn Dove (1) Elaine Dove (2) v The London Borough of Havering.* This was an appeal by the tenants against their eviction by the local authority.

The local authority had been suspicious for some time that the tenants who were sisters were not occupying their property as their only or principal home. An initial investigation in 2003 was inconclusive but a second investigation in 2010 found that no one was living at the tenanted property.

The local authority therefore withdrew housing benefit and served a Notice to Quit. The sisters unsuccessfully appealed to the First-tier Tribunal (Social Entitlement Chamber) (FTT) against the withdrawal of their benefit. In the course of the Tribunal proceedings, reference was made to the fact that both sisters were in long term intimate relationships of 30 and 20 years respectively, with men who lived in other areas of London, spending four to five nights with their partners. The Tribunal therefore concluded that the sisters' flat was not in use as a home but rather as a storage facility, also taking note of the fact that the consumption of utilities was very low.

The local authority applied for possession of the property and was successful. The sisters appealed this decision arguing that the Judge had been wrong to essentially be bound by the decision made in the FTT and also failed to consider the intention of either sister as regards the flat.

The Court of Appeal rejected the sisters' argument and found that the Judge had considered all of the evidence and had made his own findings of fact. The Court also considered it critically important that what the sisters had argued before the Judge was not that there had been a change of circumstances since the decision of the FTT had been made, but that the decision made had been wrong. Furthermore, neither of the sisters had suggested they had an intention to change their settled patterns of life in the foreseeable future.

The question of whether a property was a person's principal home could not be decided by a simple "day count" and the Judge had correctly looked at all of the evidence, including the evidence adduced before the FTT. The Judge was therefore entitled to conclude that neither sister was occupying the flat as their principal home when the notice to quit was served and took effect.

Registered providers should take heart from this decision and feel confident that if they have robust evidence they can put before the court, that Judges will make the right decision. However, it should be remembered that the evidence in this case was very strong and that in cases where it is alleged that tenants do not occupy a property as their only or principal home (and do not have an intention to return), the courts will look at all of the evidence put before them, including the evidence of absent tenants and what their intentions are.

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Homelessness: equality duty and suitability

The case *Hackney LBC v Haque* [2017] EWCA Civ 4 concerns the public sector equality duty in the context of suitability and provides guidance on the approach required of local authorities.

Mr Haque was acknowledged to be disabled within Section 6 of the Equality Act 2010 on account of his chronic neck and back pain and depression. He was accepted as homeless by the London Borough of Hackney and offered one room in a hostel in discharge of the local authority's duty under Section 193(2) of the Housing Act 1996. However Mr Haque claimed that the accommodation was unsuitable because of its size and rule prohibiting visitors which he argued exacerbated his physical and mental health conditions. On review the local authority upheld its decision that the offered accommodation was suitable.

In the County Court HHJ Luba QC quashed the decision of the local authority on the basis that it did not comply with the equality duty, holding that (in almost all circumstances) a local authority must spell out in express terms its reasoning under the Equality Act when upholding a decision as to suitability and in this case the reviewer had failed to address what was required.

However the Court of Appeal has allowed an appeal by the London Borough of Hackney, holding that a decision letter relating to suitability must evidence the following to be compliant with the public sector equality duty (para. 43 of the judgement): (1) a recognition of disability within the meaning of Section 6 of the Equality Act 2010 (2) a focus on the specific aspects of the impairments to the extent relevant to the suitability of the accommodation (3) a focus on the consequences of such impairments in terms of the disadvantages in using the accommodation and by comparison with persons without such impairments (4) a focus on the particular needs in relation to accommodation arising from those impairments by comparison with the needs of persons without such impairments, and the extent to which the proposed accommodation met those needs (5) a recognition that the particular needs arising from the impairments might require that applicant to be treated more favourably in terms of the provision of accommodation than others not suffering from disability or other protected characteristic (6) a review of the suitability of the accommodation which paid regard to those matters.

In cases such as this one where the subject matter of the review and the public sector equality duty are so related, a thorough suitability review meeting the above will comply with the public sector equality duty even if the decision is worded without express reference to the language of the Equality Act 2010. London Borough of Hackney's review decision fell within this category and as such the Court of Appeal considered that HHJ Luba QC was wrong to quash the review decision and the local authority's appeal was accordingly allowed. The duty required the reviewer to 'apply sharp focus upon the particular aspects of Mr Haque's disabilities and to ask himself with rigour, and with an open mind, whether the particular disadvantages and needs arising from them were such that Room 315 was suitable as his accommodation' (para. 44).

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