* Oo	North Northamptonshire
	Council

Item no:

EXECUTIVE 16th December 2021

Report Title	Euro Hotel: Temporary Accommodation Proposal
Report Author	David Watts, Executive Director, Adults, Communities and Wellbeing
Executive Member	Councillor Andy Mercer, Executive Member for Housing and Communities

Key Decision	⊠ Yes	□ No
Is the decision eligible for call-in by Scrutiny?	□ Yes	⊠ No
Are there public sector equality duty implications?	☐ Yes	⊠ No
Does the report contain confidential or exempt information (whether in appendices or not)?	☐ Yes	⊠ No
Applicable section number for exemption from publication under Schedule 12A Local Government Act 1974	Not applicable	

List of Appendices

None

1. Purpose of Report

1.1. To report an Executive decision that was made under the urgent measures process as permitted under the Council's Executive Procedure Rule 17. The decision taken by the Chief Executive approved the Council working with the Housing Network to bring the empty Euro Hotel in Wellingborough back into use to provide temporary accommodation for single homeless households.

2. Summary of Report

2.1 There is a demand for temporary accommodation from single homeless households in North Northamptonshire that exceeds current supply. This includes a requirement for emergency accommodation provision for those experiencing rough sleeping as well as those individuals to whom the Council owes a statutory temporary accommodation duty.

2.2 The result of this is twofold:

- A cohort of single homeless people is placed in unsuitable temporary accommodation outside of the North Northamptonshire boundary away from their support networks and in some cases, in breach of the Council's Temporary Accommodation Policy and potentially sstatutory requirements related to the suitability of accommodation.
- The Council's ability to reduce rough sleeping and bring rough sleepers off the streets quickly and adhere to the 'Everyone In' commitment is compromised.
- 2.3 The proposal to bring the Euro Hotel back into use to provide 17 rooms of emergency accommodation will significantly improve the Council's ability to address the current risks and challenges outlined in section 2.2.
- 2.4 The Council will follow a compliant procurement process to enable a block booking arrangement with the property owners, The Housing Network, for the entire facility until the end of March 2022. After this time, an alternative funding stream, namely the Rough Sleeper Initiative (RSI) Funding (Round 5) for 2022 2025, will be explored to try to secure the longer-term financial feasibility of the scheme which it is hoped can continue to operate as a supported housing facility for single homeless households into 2022 to 2023 and beyond.
- 2.5 The challenges of successfully operating a 17-bed homeless facility which would accommodate 17 vulnerable homeless individuals with a mix of complex support needs is recognised. There is a requirement for sufficient staffing and security measures to ensure that such a project is robustly managed to minimise the impact on service users, the local community and the Council's reputation, particularly having regard to the history of the building detailed in section 4.2.
- 2.6 Assuming the facility opens on 20th December and operates under this proposed arrangement for 15 weeks, the additional revenue budget required for the period is £28,785. A business case to seek access to COMF (Covid Outbreak Management Fund) for the security costs is being drafted. Should a request for COMF funding be unsuccessful, funding of £28,785 will be met via the Council's Homelessness Revenue budget although Department for Levelling Up, Housing and Communities will also be approached to enquire as to whether additional projected RSI (Round 4) underspend can be redirected to the scheme. Even if this is approved it will only cover around half of the budget required.
- 2.7 An urgent decision was required in order to enable the Housing Network to commence the refurbishment of the building so that the emergency accommodation will be available to support single homeless individuals from 20th December 2021 and throughout the remainder of the winter.

3. Recommendations

3.1 To note the decision taken on behalf of the Executive, made under special urgency powers, to:

- (a) Approve the proposal to work with The Housing Network to bring the former Euro Hotel back into use as emergency accommodation.
- (b) Delegate authority to the Executive Member for Housing and Communities, in liaison with the Executive Director for Adults, Communities and Wellbeing, to procure, negotiate, award and enter into a contract with the property owners to block book rooms to provide Temporary Accommodation to the Council for Rough Sleepers and those at risk of homelessness

3.2 Reason for Recommendations:

The use of urgency powers was necessary in order to enable The Housing Network to refurbish the property to make it available as emergency accommodation for single homeless households by 20th December in order for the Council to discharge the requirement to provide emergency accommodation provision for those experiencing rough sleeping as well as those individuals to whom the Council owes a statutory temporary accommodation duty

4. Report Background

The Euro Hotel

- 4.1 The Euro Hotel, located at 90-92 Midland Road, Wellingborough, is a four-storey property owned by The Housing Network who are a third-party provider of nightly-charged temporary accommodation. Adjacent to the property are residential / commercial units comprising of flats, houses and a mid-size warehouse which is part of an Auctioneers business. The hotel was previously used as temporary bed and breakfast accommodation by the sovereign councils of North Northamptonshire for many years prior to The Housing Network's ownership.
- 4.2 The property has been vacant and boarded up for almost two years after closing towards the end of 2019 following various complaints pertaining to the antisocial behaviour of the residents. Jonathan, a rough sleeper from North Northamptonshire, tragically passed away in the property and the Safeguarding Adults Review (SAR) that followed, SAR019, attracted media attention. The recommendations and learning from the SAR are still being implemented to date. Since being out of use, the property has been broken into on a number of occasions, items have been stolen from the property, there has been significant damage and unauthorised persons found within the property.
- 4.3 The hotel currently comprises 19 bedrooms of which six are en-suite, in addition to 4 bathrooms, 1 toilet, 2 kitchens and a dining room, laundry area and reception area. It is proposed that the property be brought back into use following refurbishment and remodelling to provide 17 rooms (of which six are en-suite) of temporary accommodation for single homeless households. The remodelling and reduction in the number of bedrooms would allow for adequate communal bathroom and kitchen facilities in addition to space to conduct support assessments with the residents. The Housing Network would be responsible for all the capital costs associated with the refurbishment, remodelling and building compliance.

4.4 Subject to a compliant procurement procedure, it is proposed that the Council procure the rooms within the building in their entirety from The Housing Network who would retain the repair, maintenance, and management responsibility for the building.

Demand for Temporary Accommodation

- 4.5 There is a significant demand for temporary accommodation for single homeless households in North Northamptonshire both those vulnerable individuals to whom the Council owes a statutory interim accommodation duty, and rough sleepers who require emergency accommodation through the exercising of discretionary accommodation powers. This need is particularly acute in the Wellingborough locality and particularly acute for single person households who made up 72% of all new homeless approaches to the Council during October 2021 (230 individuals). Proposed occupants of the facility would be a mix of rough sleepers placed using discretionary powers, and other vulnerable single people to whom the Council owes statutory temporary accommodation duties.
- 4.6 After a spike in rough sleeping during August and September, reduced through focused work from the Council's Rough Sleeping team, figure 1 shows that there were 10 individuals sleeping rough on a single night at the end of October. There were 26 individuals who were known to have slept rough during that month. The annual rough sleeper estimate took place across North Northamptonshire on the evening of 10th November 2021 and an independently verified snapshot of 12 rough sleepers was reported to the Department for Levelling Up Housing and Communities (DLUHC), the official statistical return for North Northamptonshire as the number of individuals evidenced to be bedded down on that evening. The Council, through a Rough Sleeping Reduction Action Plan required by DLUHC, has committed to a snapshot target of nine rough sleepers by the end of March 2022.
- 4.7 With winter fast approaching, there is a pressing need to bring more rough sleepers off the streets to protect their health and wellbeing. The single biggest barrier to reducing rough sleeping at present is the lack of immediate-access emergency accommodation options within North Northamptonshire. Whilst the Rough Sleeper Accommodation Programme (RSAP) proposal will go some way to increasing provision in the medium term if that bid is successful, an additional and more immediate response is required to increase the supply of single person temporary accommodation in the short-term in order that our Rough Sleeping teams are able to bring more people off the streets

Figure 1: Number of individuals rough sleeping in North Northamptonshire, April-October 2021

Month, 2021	Snapshot rough sleeping single night figure	Of which: new to rough sleeping that month	Monthly figure: no. people slept rough over the course of the month	Of which: new to rough sleeping that month
April	12	2	28	11
May	15	5	27	5
June	18	8	28	10
July	15	6	30	16
August	28	16	38	25
September	25	15	42	25
October	10	3	26	7

Source: data provided to DLUHC as part of Rough Sleeping Initiative (RSI) monitoring arrangements

- 4.8 In addition to the demand for immediate access accommodation from the Council's rough sleeping cohort, there is also an increased demand for temporary accommodation from single person households with vulnerabilities to whom the Council owes a statutory interim accommodation duty. Based on temporary accommodation snapshot data for those owed statutory interim accommodation duties, in the week commencing 18th October 2021, there were 49 households placed in bed and breakfast/hotel accommodation by the Council of which 38 households had been placed by the Wellingborough locality team. The majority of these bed and breakfast/hotel placements (46 in number) are single person households.
- 4.9 There is also a need for the Council to reduce the number of 'out of area' temporary accommodation placements, that is those households who are temporarily accommodated outside of North Northamptonshire. Accommodating homeless households outside of North Northamptonshire brings risks related to the statutory requirement to ensure that interim accommodation placements are suitable for homeless households (sections S206(1) and 210 of the Housing Act 1996, and the Homelessness (Suitability of Accommodation) Order 2012 (S.I (Statutory Instrument). 2012/2601) apply). Section 9.4 of the Council's Temporary Accommodation Policy (provided as a background paper to this report) applies.
- 4.10 Across all types of temporary accommodation, in the week commencing 18th October, there were 40 out of area placements of which 14 were single person households. Of these out of area placements, 26 households (9 single person households) relate to the Wellingborough locality demonstrating a particular need to increase temporary accommodation supply in that area in order that

- homeless households can be accommodated and supported in more suitable temporary accommodation in their 'home area'.
- 4.11 More detailed financial analysis undertaken on 18 November 2021 showed that 10 single person / childless couple households were temporarily accommodated outside of North Northamptonshire in nightly paid temporary accommodation at an average gross cost per night of £38.80 per night, or a total cost of £388 per night / £2716 per week. Households were accommodated in Northampton, Peterborough and Bedford. The income recouped from these placements (allowing for a 10% rent arrears loss) equates to £99.83 per night, or £699 per week resulting in a net cost to the council, from the General Fund homelessness revenue budget of £2017 per week or £201.70 per week per person for these out of area placements alone.

Proposal

- 4.12 The preferred option is to repurpose the building as a temporary single homeless facility which would enable the Council to further reduce rough sleeping and reduce the risk of legal challenge / reputational damage from out of area temporary accommodation placements.
- 4.13 Having regard to the history pertaining to the Euro Hotel, the need for a robustly managed service that is suitable for the vulnerable residents and local community is recognised. The following conditions have been outlined to The Housing Network by the Council's housing officers as essential service requirements:
 - Facility manager during office hours (Monday-Friday 9am-5.30pm)
 - Building security restricted access arrangements and CCTV
 - Daily cleaning and maintenance of communal areas
- 4.14 It is recommended that a security officer is also present on site 24/7. This significantly increases the revenue budget required to mobilise the scheme and operate until the end March 2022 but is regarded as an essential feature to ensure that the facility operates safely and successfully in the initial months. Longer term assurance around the facility's future from April 2022, which it is hoped can be secured via RSI Funding Round 5 for the period April 2022 March 2025, will enable security costs to be reduced through the provider owner recruiting an in-house team. This longer-term assurance would also enable the Council to renegotiate nightly charges and agree a more competitive rate.
- 4.15 The following additional actions are proposed to further mitigate the risks of antisocial behaviour and negative impact on neighbours / the local community:
 - Liaison with Northamptonshire Police to ensure that routine patrols include the address
 - Regular inclusion of the address in rough sleeper street outreach sessions (including out of office hours) undertaken by Council employed Rough Sleeper Workers
 - Close liaison with The Housing Network in producing certain policies, procedures and occupation agreements to include, for example, a loitering policy.

- An identified single point of contact with the Council's Housing Options team to maintain oversight of current occupants and consider the suitability of new placements
- Rebranding it is proposed that the facility would not be called the Euro Hotel but would be renamed as a 'place' or 'project'.
- 4.16 It is proposed that the Council's team of Rough Sleeper Workers would work intensively to provide housing related support to all rough sleepers placed in the facility. It is envisaged that they would conduct support sessions and have a regular presence on site.
- 4.17 Colleagues in the Council's Environmental Health / Private Sector Housing team have visited the vacant building and provided feedback which will help to inform the schedule of works that The Housing Network will need to undertake to ensure the facility meets relevant health and safety regulations. Colleagues are also of the view that the building may also require a House in Multiple Occupation (HMO) license.
- 4.18 The Council's Planning department has also been consulted and has advised that the property might require a change of use application if it is to operate as an HMO. Conversations between colleagues in Housing, Environmental Health / Private Sector Housing and Planning continue in this regard and The Housing Network are being kept informed of developments, (The Housing Network have already committed to making any such applications in this regard). Despite the need to resolve these ongoing conversations, so as not to delay the reopening of the hotel for the purpose of safeguarding vulnerable adults this winter, colleagues agreed that on the basis the hotel would operate in exactly the same way with and without the appropriate permissions, and risk is negligible in this regard, we should proceed with reopening and continue to address licensing and planning permission (if required) concurrently.
- 4.19 The Housing Network have estimated that it will take them three to four weeks to repair and remodel the building.
- 4.20 Finally, by approving the recommendations and securing a 'block booking' until end March 2022 via a compliant procurement process, temporary accommodation at the single homeless facility can be secured in the most efficient and timely manner, providing better value for money to the Council. It will also ensure that vulnerable residents benefit from a dedicated facility for the duration of their homelessness instead of multiple placements and or being placed out of area based on availability of other nightly paid temporary accommodation. As Housing Network are already an established provider of nightly-charged temporary accommodation to the Council, this work will feed into the wider procurement project relating to the Council's overall use and cost of nightly paid temporary accommodation and regularising this through a Dynamic Purchasing System (DPS) as set out in section 5.4.
- 4.21 The alternative option is to continue, in the short term, to secure nightly paid temporary accommodation on an ad hoc, spot purchased basis elsewhere to meet the demand from single homeless households.

- 5.1 The preferred option of working with The Housing Network to operate a single homeless facility has several positive impacts.
- 5.2 Whilst the proposed scheme, at least until March 2022, is more expensive than existing temporary accommodation solutions for this cohort, it represents a significantly safer and more suitable supported housing scheme which has the potential to provide a much-needed resource in future years. It will also reduce the risk of legal challenge, reputational damage, and will safeguard vulnerable homeless individuals.
- 5.3 As discussed in section 4.14, the demand for this proposed single homeless facility will exist in the longer term and the Council will shortly commence a coproduction process with Department for Levelling Up, Housing and Communities in respect of a bid for 3-year RSI Funding (Round 5) from 2022-2025. It is proposed that the ongoing costs of operating this facility will be sought from the RSI Funding (Round 5) opportunity to ensure no additional pressure exists on the Council's Homelessness Revenue budgets for 2022-23.
- In relation to procurement, currently nightly paid temporary accommodation (bed and breakfast/hotels and self-contained) is spot purchased from third party providers including The Housing Network. Meetings with the Council's procurement team are underway to explore whether there is a more suitable way of procuring temporary accommodation that enables the Housing Options Team to fulfil statutory interim accommodation duties whilst also satisfying the Council's procurement regulations. One option in the early stages of being explored is a Dynamic Purchasing System (DPS). Due to the time critical need for this type of accommodation within North Northamptonshire, and the fact that this proposal simply seeks to replace spot-purchased nightly paid temporary accommodation already being utilised elsewhere within and outside of North Northamptonshire, it is proposed that discussions with Procurement colleagues run concurrently to the progression of this opportunity.
- 5.5 The proposal also represents an opportunity for wider savings across Adult Social Care and Health as the crisis presentations associated with this cohort of individuals experiencing Multiple Exclusion Homelessness (MEH) are disproportionately resource intensive.
- 5.6 As a provider of nightly paid temporary accommodation, The Housing Network work in partnership with many councils regionally and nationally including Coventry City Council, Leicester City Council and London Borough Council's including Southwark, Harrow and Barnet. As owners of the Euro Hotel, there is a risk that The Housing Network offer the proposal to another Local Authority who are experiencing temporary accommodation pressures which would mean an additional 17 single homeless people, at least temporarily, accommodated within the Wellingborough area.
- 5.7 The Housing Network have planning permission to convert the hotel into 9 x 2-bedroom self-contained units. The Housing Network have advised Council officers that, should the Council not wish to utilise the building as a single homeless facility, the conversion to 9 units will not take place for a further 18-24

- months. The building will remain vacant during this period and would be likely to continue to attract antisocial behaviour as detailed in section 4.2.
- 5.8 A decision to not progress with the proposal, will lead to significant winter pressures in relation to rough sleeping and compromise the council's ability to prevent harm to individuals on the streets. Whilst a Severe Weather Emergency Protocol is in place to ensure that offers of emergency accommodation are made to all rough sleepers during severe weather, the offer of an unsupported out of area placement is less likely to be accepted and/or sustained. The risks associated with out of area placements has already been set out.
- 5.9 A decision not to progress with the proposal will also mean that the Council will lose £30,100 of repurposed RSI Funding (Round 4) for 2021 2022 which is earmarked for the scheme.

6 Next Steps

6.1 It is proposed that the Council will assemble a project team of officers from the Housing, Communities, Planning, Environmental Health and Benefits teams to oversee the mobilisation phase and monitor the ongoing delivery of the project and its outcomes.

7 Implications (including financial implications)

7.1 Resources and Financial

- 7.1.1 The Housing Network propose to provide the facility to the Council on a nightly rate per room. They require a 'block booking' commitment for a period of time to make the proposal financially viable and are aware that the Council can currently only consider a commitment until the end March 2022.
- 7.1.2 The proposal is for the Council to block book the 17 rooms until the end of the financial year and there is certainly a sufficient demand to guarantee full occupancy for this period. Assuming, based on a 3-4 week refurbishment programme, that the facility can be occupied from 20th December, the block booking commitment equates to 15 weeks until the end March 2022.
- 7.1.3 Inclusive of one full time staff member working office hours, CCTV and daily communal cleaning detailed in section 4.12, The Housing Network will charge £35 per room per night. There will be 17 rooms available equating to a gross cost of £4,165 per week.
- 7.1.4 The Council can recoup £12.19 per room per night via Housing Benefit (based on 100% of the January 2011 Local Housing Allowance rate). A small number of guests (estimated to be 1 at any one time) may have no recourse to public funds (NRPF) which means the Council is unable to recoup this income. Income from Housing Benefit is therefore calculated (based on 16 rooms, allowing a 10% income loss due to rent arrears and voids) at £1,229 per week.

- 7.1.5 The cost of a 24/7 security officer will be additional and during the initial period until March 2022, The Housing Network will source and manage this at a rate of £15.50 per hour which equates to a cost of £2,604 per week.
- 7.1.6 Approval has been obtained from Department for Levelling Up, Housing and Communities to repurpose RSI Funding (Round 4) underspend to the value of £30,100 towards the cost of accommodating rough sleepers in this facility, assumed to occupy 9 of the 17 rooms. Based on 9 rough sleepers occupying the facility for 15 weeks, this equates to a contribution of £2,007 per week.
- 7.1.7 If 9 rooms are modelled to be occupied by rough sleepers, the remaining 8 rooms would be occupied by statutory homeless individuals the cost of which is met by the General Fund Homelessness Revenue budget. Section 4.11 of this report shows that the current net cost to the Council of accommodating one person in temporary accommodation out of area is £201.70 per week. This equates to £1,614 per week for 8 individuals who could be moved 'in area' to occupy the remaining 8 rooms in this facility.

Figure 2: Weekly cost of block booking the Euro Hotel (costs apply to initial period until March 2022)

Income / expenditure item	Weekly cost for entire facility
Nightly room charge (inclusive of 1 full	£4,165
time staff member, communal	
cleaning, and CCTV / secure access	
arrangements	
Security officer 24/7 (via a contractor	£2,604
on an hourly rate)	
Projected income from Housing	-£1,229
Benefit	
RSI (Round 4) repurposed	-£2,007
underspend contribution	
Current net cost of accommodating 8	-£1,614
statutory homeless individuals who	
would be moved to this facility	
Shortfall / additional revenue funds	£1,919 (or £112.88 per room per
required per week	week)

- 7.1.8 Assuming the facility opens on 20th December and operates under this proposed arrangement for 15 weeks, the additional revenue budget required for the period is £28,785.
- 7.1.9 A business case to seek access to COMF (Covid Outbreak Management Fund) for the security costs is being drafted on the basis that this would secure the financial viability of the project this winter and therefore enable the Council to continue to bring in rough sleepers thus reducing the risk to this community from Covid-19, in line with the Government's encouragement for Local Authorities to continue the 'Everyone In' campaign operated during the pandemic.
- 7.1.10 Should a request for COMF funding be unsuccessful, funding of £28,785 will need to be met via the Council's Homelessness Revenue budget although Department for Levelling Up, Housing and Communities will also be approached

to enquire as to whether additional projected RSI (Round 4) underspend can be redirected to the scheme. Even if this is approved it will only cover around half of the budget required.

7.1.11 North Northamptonshire Council has been awarded a Winter Uplift Homelessness Prevention Grant payment of £208,586 in addition to the Homelessness Prevention Grant for 2021-2022 of £994,797. Whilst the cost of temporary accommodation falls outside the scope of these grants, the uplift payment does reduce some pressure on the General Fund homelessness revenue budget.

7.2 Legal and Governance

- 7.2.1 The Council's Executive Procedure Rule 17 provides that, where any matter is urgent and cannot wait until the next meeting of the Executive, the Head of Paid Service (i.e. the Chief Executive) may take the necessary action, provided that he first consults the Leader and reports the decision to the next public meeting of the Executive.
- 7.2.2. The Leader was consulted on 2nd December 2021 and indicated that he did not object to the Chief Executive making the decision in accordance with the urgency provisions to ensure that the Council did not miss out on opportunity to secure additional emergency accommodation for single homeless households for this winter.
- 7.2.3. The proposal will aid the Council to meeting its statutory duties to prevent and relieve homelessness as set out in Part 7 Housing Act 1996, as amended.

7.3 Relevant Policies and Plans

- 7.3.1 The proposal meets the priorities of the Council's draft Corporate Plan relating to active, fulfilled lives and thriving places. Reducing rough sleeping contributes to the Council's vision by ensuring that North Northamptonshire is a safe and attractive area with a thriving economy. Rough sleeping, whilst fundamentally and most visibly a housing issue, is also closely interlinked with begging and street drinking, as well as other antisocial behaviour and crime which impacts on local businesses and the local economy.
- 7.3.2 The proposal will enable the Council's greater adherence to the adopted Temporary Accommodation Policy provided as a background paper to this report.

7.4 Risk

7.4.1 A comprehensive rough sleeping pathway with an adequate supply of suitable accommodation solutions is imperative in reducing the risk of rough sleepers experiencing deteriorating health and death on the streets.

7.4.2 The risks of not taking action to swiftly increase the supply of temporary accommodation for single homeless people have been examined in sections 2.2, 4.9, 4.12 and 5.2.

7.5 Consultation

- 7.5.1 The Leader was consulted and supportive of the recommended decision.
- 7.5.2 The Chairs of Scrutiny were consulted due to the matter being a Key Decision and did not objected to the decision proposed to be taken by the Chief Executive under urgency powers.
- 7.5.3 The Department for Levelling Up, Housing and Communities specialist Rough Sleeping and Homelessness Advisors have provided their support to this proposal highlighting the requirement in North Northamptonshire for more emergency 'off the street' accommodation options prior to the onset of winter and noting the need as critical. A request to repurpose projected RSI Funding (Round 4) underspend was therefore approved and needs to be spent by end March 2022.

7.6 Consideration by Executive Advisory Panel

7.6.1 None

7.7 Consideration by Scrutiny

7.7.1 The Chairs of Scrutiny were consulted due to the matter being a Key Decision and did not object to the decision proposed to be taken by the Chief Executive under urgency powers.

7.8 Equality Implications

7.8.1 None identified

7.9 Climate Impact

7.9.1 The placement of single homeless households within the North Northamptonshire area will have a positive impact on carbon reduction due to more local journeys for needing to be undertaken.

7.10 Community Impact

7.10.1 As well as providing suitable accommodation to safeguard vulnerable rough sleepers the proposal will have wider positive community impacts linked with a likely reduction in crime as explained in section 7.11.1.

7.11 Crime and Disorder Impact

7.11.1 Rough sleeping, whilst fundamentally and most visibly a housing issue, is also closely interlinked with begging and street drinking, as well as other antisocial behaviour and crime which impacts on local businesses and the local economy. The proposal will have a positive impact on reducing this activity on the streets, enabling rough sleepers to be accommodated securely in a robustly managed scheme. The proposal also brings an empty building back into use thus reducing the risk of crime and antisocial behaviour associated with this.

8 Background Papers

8.1 The Council's Temporary Accommodation Policy