

Report for: Cabinet 6 March 2018

Title: Homelessness Strategy

Report authorised by: Helen Fisher, Interim Strategic Director of Regeneration, Planning and Development

Lead Officer: Alan Benson - Head of Housing Strategy & Commissioning

Ward(s) affected: All

Report for Key/Non Key Decision: Key

1. Describe the issue under consideration

- 1.1 The Council adopted a new Housing Strategy in November 2016, with a strategic objective to “Improve support and help to prevent homelessness”. This set out a broad approach to homelessness, focusing on advice and prevention, alongside a new approach to temporary accommodation and the allocation of affordable housing.
- 1.2 The Council is required to carry out a homelessness review and publish a Homelessness Strategy at least every five years. Haringey’s last Homelessness Strategy was published in 2012.
- 1.3 Following joint work with the Homelessness Forum, the Council developed and consulted on a draft Homelessness Strategy between 14 November 2016 and 19 January 2017. However, a decision was taken to pause the formal adoption of the draft Homelessness Strategy, pending clarity around the implications of the Homelessness Reduction Bill (which received Royal Assent in April 2017) and levels of funding to be made available when the Temporary Accommodation Management Fee was replaced with the Flexible Homelessness Support Grant, again in April 2017.
- 1.4 This report sets out the new Homelessness Strategy which has been developed following that consultation and subsequent further work with the Homelessness Forum. This new strategy sits alongside a new Rough Sleeping Strategy.

2. Cabinet Member Introduction

- 2.1 Homelessness is a blight on communities and individuals, with significant human and financial costs. It is a problem that affects Haringey particularly severely; with the second highest level of homelessness in the country and growing numbers of rough sleepers. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.
- 2.2 Our vision is that Haringey is a place where we all work together to prevent and resolve homelessness and rough sleeping. Our objectives are:
- to reduce the financial and human costs of homelessness - through intervening earlier to prevent homelessness, increasing the supply of accommodation available and meeting the needs of those already in Temporary Accommodation, and
 - to deliver an ongoing reduction in rough sleeping and address the multiple harms it brings to individuals and communities - through rapid intervention to offer a route off the street for all, improving health, wellbeing and resilience and tackling street activity associated with rough sleeping.
- 2.3 The draft Homelessness Strategy presented here has been developed collaboratively with partners across the borough including statutory service providers, voluntary and community organisations, and people using our services. Officers will continue working closely with these groups and individuals as we develop our strategic delivery plan.
- 2.4 The Homelessness Strategy sets out our broad strategic vision, objectives and the overarching principles that inform our approach to addressing homelessness in Haringey, as well as summarising the harms and costs to people and communities caused by homelessness and rough sleeping. Our commitment to preventing homelessness at an earlier stage applies equally to single vulnerable people who may be at risk of rough sleeping as it does to families. However, in recognition of growing numbers of rough sleepers in Haringey, and the particular harms to people and communities that sleeping on our streets causes, we have developed a standalone Rough Sleeping Strategy to accompany the Homelessness Strategy. In that strategy, we identify an additional three priorities that we think are essential to effectively address rough sleeping in the borough.

3. Recommendations

It is recommended that Cabinet:

- 3.1 Notes the Equalities Impact Assessment at Appendix 2
- 3.2 Approves the draft Homelessness Strategy set out in Appendix 1, and, in particular, the priorities of the strategy which are as follows:
 - (a) Intervening earlier to prevent homelessness (as set out in section 7.1)
 - (b) Increasing the supply of accommodation available (as set out in section 7.2)
 - (c) Meeting the needs of those already in temporary accommodation (as set out in section 7.3)

4. Reasons for decision

- 4.1 Homelessness in Haringey remains a persistent challenge, with the second highest level of homelessness in the country. A radically different approach that drives whole systems change is necessary. Haringey needs a new culture for dealing with homelessness; rooted in honesty about what is and is not possible and based on finding solutions and offering support.
- 4.2 The shared strategic vision and priorities set out in the Homelessness Strategy will guide our homelessness prevention and relief activities with partners and our communities over the coming years. This strategy is necessary to ensure our approach is appropriate, co-ordinated and that we are held to account on delivery.
- 4.3 The recommendation in 3.1 is to ensure the Council has met its duties under the Equality Act 2010.
- 4.4 The recommendation in 3.2 is to ensure that the Council meets its statutory duty to carry out a homelessness review and publish a Homelessness Strategy. The Council published its last Homelessness Strategy in 2012.

Alternative options considered

- 4.5 Not to produce a Homelessness Strategy. The Council would be failing in its statutory obligations if it failed to produce an up to date Homelessness Strategy. The lack of a strategy would also render the council less effective in setting out its strategic approach to tackling homelessness and would make partnership working more difficult without a clear agreed direction.
- 4.6 Alternative priorities within the Homelessness Strategy were considered and discounted:
 - A 'Gatekeeping' approach to homelessness. By making it harder for people to get help from the council, numbers in temporary accommodation could be minimised. This option was discounted as it does not reflect the new statutory framework of the Homelessness Reduction Act and the wider focus on prevention set out in the Council's Corporate Plan.
 - A focus on moving significantly more households out of London. Whilst this option may need to be reviewed in future, it is currently not deemed to

be in the interests of the council to pursue housing solutions that force families to move far away from their social and community networks

- Less focus on the ‘personal’ factors that contribute to homelessness. Our approach could have simply sought ‘housing’ solutions to homelessness without also addressing the underlying root causes such as poverty, unemployment and poor health and wellbeing. This option was discounted; the housing options people access have to be sustainable for them and for this they need to be resilient and independent.
- Less reliance on the Private Rented Sector as a source of homes. The council simply does not have access to enough social rented accommodation for all those threatened with homelessness.

5. Background information

Strategic context

5.1 *Local Strategic context*

This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the Corporate Plan notes, “We will provide realistic and achievable options for people to find housing or alternative housing.” Further details of the local strategic context are set out in section 7 and in the strategy.

New legislation and responsibilities

- 5.2 Since the previous Homelessness Strategy, there have been a number of important pieces of legislation, including the Localism Act 2012, the Housing and Planning Act 2016 and recently the Homelessness Reduction Act 2017, which will come into force in April 2018. These are all reflected in the strategy as appropriate.

Reduction in the incomes of households vulnerable to homelessness

- 5.3 There have also been significant changes to the ability of households to sustain private sector tenancies. This is partly because of new legislation, such as the Welfare Reform and Work Act 2016, which caps the maximum income households on benefit can receive. The Overall Benefit Cap limits maximum benefits that a London family can receive to £23,000 per year, for couples and families with children, and £15,410 for single people without children, with the benefit removed from the housing element. This has resulted in an average reduction of £14.16 a week in the incomes of Haringey’s low-income working-age households.
- 5.4 At the same time private sector rents in Haringey have continued to rise faster than incomes, while the government has frozen increases in Local Housing Allowance (LHA) rates for 4 years from April 2016 meaning fewer properties are available within these rates.

Supply and demand for housing

- 5.5 Haringey continues to experience a high level of demand for help with housing. As at 1st November 2017, 3,049 Haringey households were living in council-provided temporary accommodation. A recent report by Shelter ranks Haringey as second only to Newham in having the highest rates of recorded homelessness in the country, with one in every 29 people in the borough either sleeping rough or living in temporary accommodation provided by the council.
- 5.6 In 2016/17, 967 households asked the council for help because they were threatened with homelessness. In 435 cases, the council was able to help them avoid becoming homeless. Homeless acceptances in Haringey have decreased from a peak of 762 in 2013/14 to 686 in 2016/17, in contrast to the London picture of increasing acceptances over this period. Numbers in temporary accommodation have now started to reduce, largely due to success in preventing and relieving homelessness, with 3,049 households in TA on 1st November 2017. Loss of a private rented sector tenancy remains the most common reason for homelessness, alongside friends and family asking the person to leave.
- 5.7 Haringey's annual supply of new and relet social rented accommodation has reduced by 50% since 2011, so the Council cannot hope to meet the housing needs of those presenting as homeless through the allocation of social housing alone. Estate regeneration offers opportunities for new affordable homes to be built in Haringey; however, the benefits of these projects in terms of new affordable supply may not be seen for several years. The social rented sector accounts for just under 30% of properties in the borough with the remainder in the private rented sector. A radical new approach that drives systems change is needed to reduce the multiple harms that homelessness causes.

Funding context

Flexible Homelessness Support Grant

- 5.8 Temporary accommodation costs for homelessness households have previously been met by central government through the Temporary Accommodation Management Fee (TAMF) paid through the Housing Benefit system. The overheated rental market in the capital led to this being increasingly topped up by boroughs' General Funds, reducing the ability of councils to fund other services. In Haringey, we currently spend c£7m of our General Fund on Temporary Accommodation.
- 5.9 Our ability to meet these targets depends on our ability to:
- achieve ongoing reductions in the number of households entering Temporary Accommodation by preventing homelessness
 - reduce the length of time people stay in Temporary Accommodation by moving them on to alternative housing options more quickly – i.e. by increasing the supply of affordable private rented sector accommodation and empowering people to take these options up successfully
 - reducing the overall cost of Temporary Accommodation by, for example, obtaining better deals with landlords or purchasing open market stock

5.10 In April 2017, the Temporary Accommodation Management Fee (TAMF) was replaced by the Flexible Homelessness Support Grant (FHSG). The grant offsets the loss in Housing Benefit subsidy, with the remainder ring-fenced for 'work to prevent or deal with homelessness'. The new grant is intended to empower councils with the freedom to support the full range of homelessness services, based on what can be demonstrated to be effective locally. FHSG represents the primary source of additional revenue funding for the delivery of our Homelessness Strategy.

5.11 Haringey has received its FHSG allocations for 2017/18 and 2018/19, with further announcements on 2019/20 expected in spring 2018. Officers anticipate the amount available in 2019/20 will be significantly reduced and are currently working to a projected allocation of £1.6m.

5.12 This funding is ring-fenced for homelessness work, in as much the Ministerial Statement to both houses made by the Minister for Local Government on 15th March 2017 on announcing the funding identified that that *"In order to manage the transition to a new funding regime carefully, we are ring-fencing the grant for two years to ensure it is spent on homelessness services"* DCLG's covering email to the Haringey of 16th March 2017, accompanying the grant notification included the requirement that: *"The grant is ring-fenced for an initial period of two years and during that time may be used only to prevent or deal with homelessness"*

5.13 The Housing Benefit offset for 2017/18 that must be paid for from the FHSG is projected to be £2.9m. In addition £800,000 of the 2017/18 funding will be used to offset the General Fund overspend on temporary accommodation. Future funding allocations are likely to be closely linked to Council's proven ability to spend these resources effectively to prevent homelessness at scale.

Other funding available

5.14 Haringey has been allocated £1,235,883 'New Burdens funding', spread over the three years 2017/18 to 2019/20, in order to meet the requirements of the new Homelessness Reduction Act.

5.15 Using its General Fund, Haringey already commissions a range of services offering both accommodation and community-based support to vulnerable people. These services aim to prevent homelessness and promote independence, enabling people to remain in the community rather than be forced into more expensive institutional settings such as residential care or hospital. Over the three years 2017/18 to 2019/20 this amounts to £11,776,387.

5.16 In addition, in 2017, DCLG awarded Haringey £397,875 over 3 years to deliver a range of new services to address the growing levels of rough sleeping seen in the borough.

Consultation and strategy development

- 5.17 Following the publication of the Housing Strategy, the council consulted on a new Homelessness Strategy as part of its wider consultation on policies to meet housing need – alongside the Allocations Policy, the Tenancy Strategy and intermediate housing. This consultation took place over 9 weeks between 14 November 2016 – 19 January 2017 and received 328 responses.
- 5.18 Over 11,000 council tenants, temporary accommodation residents, sheltered accommodation residents and households on the housing register were emailed and invited to take part in the consultation. There were a series of public drop in events, held throughout the borough during November and December 2016, where information was provided to residents on the policy proposals and assistance given in completing the questionnaire. A total of 135 residents attended the four public drop-in events.
- 5.19 The consultation was advertised through both Haringey Council and Homes for Haringey websites, the Bridge Renewal Trusts Community Impact Bulletin. Paper copies of the consultation booklet were available at Station Road, Marcus Garvey and Wood Green customer service centres where customer services officers were asked to inform tenants about the consultation. In addition, all Homes for Haringey resident groups in the Borough were contacted.
- 5.20 The results of the consultation are outlined below. As the consultation was one which consulted on four key housing policies, only the questions related to the Homelessness Strategy have been included below. The table below outlines the results. A total of 328 residents responded to the consultation.

Question	Agree	Disagree
Question 2a: Do you think that the extent and cause of homelessness in the borough have been correctly assessed in the plan?	57%	43%
Question 4a: Do you think the plan has accurately assessed the impact of homelessness demand, for example, the amount of temporary accommodation required and the support homeless households need in moving on to a settled home?	58%	42%
Question 5a: Do you think the plan correctly analyses rough sleeping in the borough and included actions which will reduce it?	64%	37%
Question 6a: Does the plan include the right priorities?	66%	34%
Question 7a: Does the plan include the right actions to deliver out priorities?	71%	29%

- 5.21 There was support for the priorities and actions in the Draft Homelessness Strategy as well as the Council's assessment of housing supply and demand and its analysis of rough sleeping in the borough. Most respondents took the opportunity to comment on their personal circumstances but recurring themes included the need for the council or its partners to build more genuinely affordable housing and for some sort of rent control to be introduced in the private rented sector, to reduce or stop rents from increasing.

- 5.22 A presentation on the findings of this consultation was made to the Overview and Scrutiny Committee on 9th February 2017 and the accompanying report is attached at Appendix 3.
- 5.23 The consultation was also presented and promoted to partners at a series of forums. In particular, the Council worked in partnership with the Homelessness Forum and Core Group to develop the strategies, including setting out the strategic vision, overarching principles, and priorities. The Forum included workshops on the strategy before, during and after the formal consultation period from 14 November 2016 to 29 January 2017.
- 5.24 Following the public consultation, a decision was taken to pause development of the Homelessness Strategy pending more detail on the Homelessness Reduction Act becoming available. The Homelessness Reduction Act received Royal Assent in April 2017 and a revised draft Homelessness Code of Guidance was published in October 2017. The strategy has been refined and updated to reflect the implications of the Act and the new guidance, and other key changes since the draft was initially published, such as the new Supported Housing funding regime. During this time, the Council has undertaken further consultation events with key stakeholders from across the partnership and with people using homelessness services.
- 5.25 The Homelessness Forum was strongly of the view that the Council should produce a separate Rough Sleeping Strategy, to address this growing issue with specific challenges for the borough. The Forum also encouraged the Council to prioritise exploring hidden homelessness, in light of this too becoming an increasing problem that needs to be addressed. The draft strategy was also revised, in line with consultation responses, to ensure language used was more accessible to all stakeholders. Alongside this, the Council has committed to improving the information and training on housing needs and homelessness for providers and staff to ensure they have the knowledge and skills to support residents more effectively.

Main themes of the strategy

- 5.26 The Homelessness Strategy sets out four ways in which the Council intends to change the way it works to enable it to deliver its objectives on homelessness. It then goes on to then identify three key priorities for delivery.

How we will change what we do:

- 5.27 **Providing strategic leadership and building collaborative partnerships:** The council cannot deliver the outcomes needed on its own. Its role is to act as a platform, building capacity, sharing information and providing direction, enabling all the players to come together to deliver change. This will require us to build trust and transparency and deliver consistent messages across the partnership.
- 5.28 **Making prevention everyone's responsibility:** The best way to tackle homelessness is to prevent it from happening in the first place. All members of our partnership, including homeless people themselves, have a role to play and responsibilities in this. We must find new ways to integrate our homelessness

prevention work with other services who also meet people in housing need, enabling us to intervene earlier and more effectively.

- 5.29 **Commissioning more effectively to better meet local need:** We will use modern strategic commissioning practices to better understand local need, effectively manage resources and plan and deliver services. These practices will deliver improved value for money, a renewed focus on outcomes, quality and customer satisfaction and better integration with the local partnership.
- 5.30 **Delivering in and with our community:** Our approach to addressing homelessness recognises the strengths and assets that individuals and communities already have within them. Our offer of help will build on these strengths, empowering individuals and communities to build their resilience and self-sufficiency so they are less dependent on services in the future.

Homelessness Strategy priorities

- 5.31 **Priority 1. Intervening earlier to prevent homelessness:** The Homelessness Strategy makes a commitment to identify the specific triggers, risk factors and causes of homelessness across the life course and, building on that, to develop a range of interventions specifically targeted at addressing these. These interventions will take place at a universal, targeted and crisis prevention level and will be available to the general population, specific individuals in housing need and within the local community partnership.
- 5.32 **Priority 2. Increasing the supply of accommodation available:** Our approach to increasing the supply of homes will include: maximising the supply of social rented units available, securing more affordable tenancies in the private rented sector and increasing the length of tenure and quality of these homes. We will also review and modernise our supported housing provision in line with the Supported Housing Review.
- 5.33 **Priority 3. Meeting the needs of those already in Temporary Accommodation:** The Homelessness Strategy makes a commitment to develop a range of housing options tailored to the individual needs, aspirations and capabilities of the c3000 households currently living in temporary accommodation. Alongside this it commits to building our understanding of what households in Temporary Accommodation want and need by undertaking research and developing better data on outcomes; focus on improving the health, resilience and wellbeing of people in Temporary Accommodation and ensuring that we work with everyone in Temporary Accommodation to develop a personalised, realistic 'move on plan'.

6. Contribution to strategic outcomes

- 6.1 This initiative supports the objectives of Priority 5 in the Corporate Plan – Creating homes where people choose to live and are able to thrive. In particular, the Corporate Plan notes, *“We will provide realistic and achievable options for people to find housing or alternative housing.”*
- 6.2 The Corporate Plan Priority 5 includes the objective to “Prevent homelessness and support residents to live fulfilling lives” and aims to assess success in this objective by measuring both the number of households where homelessness has been prevented and also the number of households who have been helped into settled homes, whether in the social rent or private rented sector. The Homelessness Delivery Plan aims to drive this objective forward and improve performance in this area.
- 6.3 As set out in the report, this policy supports the delivery of Objective 2 of Haringey’s Housing Strategy 2017-2022 Objective 2 – Improve support and help to prevent homelessness:
- Provide timely and effective housing advice to help those in crisis or threatened with crisis to sustain their existing accommodation if at all possible. This will be at the first point of contact with the council and its partners but increasingly we want to intervene before an approach is made, where risk of homelessness can be identified.
 - Act at all times to prevent homelessness but where current accommodation cannot be sustained, to provide advice on realistic options and assistance to secure suitable affordable accommodation.
 - Provide suitable and affordable emergency or temporary accommodation when necessary, in accordance with fair and transparent criteria, while overall reducing the number of households in temporary accommodation and the cost of it to the local taxpayer.
 - Allocate council tenancies and intermediate tenures in accordance with fair and transparent criteria, both at the commencement and when reviewing the expiry of a fixed term council tenancy

7. Statutory Officers comments

Finance comments

- 7.1 The proposed strategy would give the Council a clear direction in tackling homelessness in the borough. Failure to respond to the homelessness crisis could result in continuing pressures on Temporary Accommodation budget.
- 7.2 The pressures faced in relation to increasing homelessness and temporary accommodation have been widely reported. These pressures, together with savings anticipated from measures being implemented, have been included in the Medium Term Financial Plan.
- 7.3 Any financial implications arising from the Homelessness Reduction Act will be reported to Members alongside the established budget monitoring and performance monitoring reports.

- 7.4 The actions and activities set out in the detailed strategy and framework will be funded from existing budgets and Flexible Homelessness Support Grant (FHSG).
- 7.5 There has been one-off funding agreed from FHSG in 2017/18 to support work on prevention as identified in the strategy and action plan. Where appropriate, and reducing spending pressures, other investment supporting the strategy may be funded on an “Invest To Save” basis”. Financial implications will be developed alongside such proposals.

Procurement comments

- 7.6 Strategic Procurement notes the contents of this report and the associated strategy documents. Strategic Procurement will provide the required support to assist the council in the delivery of this strategy; however, it should be noted the commissioning of temporary accommodation is an activity that is undertaken by Homes for Haringey, with Strategic Procurement providing limited support in developing this category.

Legal comments

- 7.7 The Assistant Director for Corporate Governance has been consulted in the preparation of this report and comments as follows. Legal Implications are otherwise set out in the body of this report. He sees no legal reason why the Recommendations should not be followed.
- 7.8 By s1 Homelessness Act 2002 the Council was required to carry out a homelessness review for its district and formulate a Homelessness Strategy informed by that review by 31 July 2003. It must keep that strategy under review, and publish a new strategy at intervals of no more than 5 years thereafter. Haringey’s last new Homelessness Strategy was published in 2012.
- 7.9 The homelessness review forming the evidence base for the draft new strategy is set out in Section 4 of the strategy.
- 7.10 The Homelessness Strategy is by s3(1), “a strategy formulated by a local housing authority for:
- (a) preventing homelessness in their district;
 - (b) securing that sufficient accommodation is and will be available for people in their district who are or may become homeless;
 - (c) securing the satisfactory provision of support for people in their district
 - (i) who are or may become homeless; or
 - (ii) who have been homeless and need support to prevent them becoming homeless again.
- 7.11 The Council is required (also by s1) to take its Homelessness Strategy into account in the exercise of its functions.
- 7.12 In formulating its Homelessness Strategy, the Council (s3 (7A)) must have regard to its current Allocation Scheme, Tenancy Strategy and the current London Housing Strategy. Relevant provisions of each are set out in the body of the strategy.

- 7.13 By s3(8), “Before adopting or modifying a homelessness strategy the authority shall consult such public or local authorities, voluntary organisations or other persons as they consider appropriate.”
- 7.14 The Council has a practice of consulting service users and providers, housing staff and other stakeholders, as well as more general public consultation to capture ideas, views and feedback. Those groups have a legitimate expectation of consultation.
- 7.15 These consultations were carried out as set out in the body of the report.
- 7.16 The Homelessness Reduction Act 2017 (“the new Act”) imposes upon local housing authorities new “assessment” “prevention” and “relief” duties to those whom the authority is satisfied are eligible and either homeless or threatened with homelessness within 56 days. These duties require authorities to:
- provide personalised written housing assessments including agreed plans setting out the steps that the authority considers it and the applicant should reasonably take to secure accommodation for the applicant (“assessment”)
 - take reasonable steps to help an applicant threatened with homelessness to secure that their accommodation does not cease to be available (“prevention”)
 - take reasonable steps to secure that suitable accommodation becomes available (for at least 6 months) to a homeless applicant (“relief”)
- 7.17 These new duties apply to all those homeless or threatened with homelessness, irrespective of whether they have a priority need; and apply in addition to the existing duties to those who are in priority need.
- 7.18 The new Act also places a duty upon specified public authorities (to be specified by statutory instrument, but expected to include a range including the armed forces, hospitals, prisons and other institutions) to refer those whom they believe may be homeless or threatened with homelessness, and who agree to be referred, to the local housing authority of the applicant’s choice. The draft Code of Guidance issued by the MHCLG recommends that local housing authorities set up procedures to deal with these referrals, including establishing protocols with likely local referrers.

Equality comments

- 7.19 The council has a public sector equality duty under the Equality Act (2010) to have due regard to; tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation); advance equality of opportunity between people who share those protected characteristics and people who do not; and foster good relations between people who share those characteristics and people who do not.
- 7.20 The potential impact of the new strategy has been assessed during and after consultation. The Homelessness Strategy identifies particular groups at risk of homelessness, including those with protected characteristics. The Equality Impact Assessment (EqIA) sets out how the Homelessness Strategy address the needs of these groups. The EqIA is attached as Appendix 1.

8. Use of Appendices

Appendix 1 Proposed new Homelessness Strategy

Appendix 2 Equalities Impact Assessment

9. Local Government (Access to Information) Act 1985

Background papers:

Corporate Plan 2015-2018

http://www.haringey.gov.uk/sites/haringeygovuk/files/corporate_plan_2015-18.pdf

Housing Strategy 2017-2022

http://www.haringey.gov.uk/sites/haringeygovuk/files/housing_strategy_2017-2022.pdf

Homelessness Strategy 2012-14

http://www.haringey.gov.uk/sites/haringeygovuk/files/homelessness_strategy_2012-14.pdf

Overview and Scrutiny Panel report February 2017 *“Consultation on Four Policies to Meet Housing Need”*

<http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CIId=128&MIId=8066&Ver=4>