

<b>Cabinet</b>  27 <sup>th</sup> October 2021	 <b>TOWER HAMLETS</b>
<b>Report of:</b> Ann Sutcliffe, Corporate Director Place	<b>Classification:</b> [Unrestricted]
<b>Progress of the Homelessness Transformation Programme</b>	

<b>Lead Member</b>	<b>Councillor Danny Hassell, Cabinet Member for Housing</b>
<b>Originating Officer(s)</b>	Karen Swift, Divisional Director Housing and Regeneration
<b>Wards affected</b>	All wards
<b>Key Decision?</b>	This report has been reviewed as meeting the Key Decision criteria. (Financial Implications)
<b>Forward Plan Notice Published</b>	29 <sup>th</sup> June 2021
<b>Strategic Plan Priority / Outcome</b>	<b>Priority 2 - A borough that our residents are proud of and love to live in</b>

### Executive Summary

This report updates Cabinet on the progress that has been made to date in the delivery of the council's Homelessness Transformation Programme.

The report also seeks approval from Cabinet for the council's revised Homelessness Accommodation Placement policy which has been updated to reflect the legislation brought into place following the Homelessness Reduction Act (2017).

### Recommendations:

The Cabinet is recommended to:

1. Note the scope and progress made by the Homelessness Transformation Programme to date.
2. Approve the council's revised Homelessness Accommodation Placement policy to take into account the provisions of the Homelessness Reduction Act (2017) and how the council, as a local housing authority, will allocate accommodation in the private rented sector to prevent and relieve homelessness.

## **1 REASONS FOR THE DECISIONS**

- 1.1 The Homelessness Accommodation Placement Policy clearly sets out the council's approach as to how officers will use available housing stock to discharge the council's homelessness responsibilities. The policy will ensure that the council follows current legislation and provides a reference point for housing options staff to make their decisions.

## **2 ALTERNATIVE OPTIONS**

- 2.1 Do nothing - if the council fails to revise its Homelessness Accommodation Placement Policy to guide officers, residents and stakeholders, the council leaves itself open to legal challenge. It could also risk a lack of clarity for officers in applying best practice within their decision making.

## **3 DETAILS OF THE REPORT**

### **Background**

- 3.1 The revision of the Accommodation Placement Policy<sup>1</sup> makes an important contribution to enabling the objectives of the Homeless Transformation Programme.
- 3.2 The Homelessness Transformation Programme continues the improvements which the Housing Options Service initiated with the Customer Access Project from Spring 2020 (further information on the improvements that the Customer Access Project can be found below).
- 3.3 This Transformation Programme is necessary to continue improving customer outcomes, to embrace new ways of working and fundamentally to create efficiencies over the course of the next three financial years (2021-2024). The Council's Medium-Term Financial Strategy includes the need to reduce the Housing Options Service's net expenditure by £2m, largely in relation to the use of temporary accommodation.
- 3.4 There is a widely held expectation among many service users in Tower Hamlets that their homelessness will be resolved through the offer of social housing. This expectation results in the very low take-up of alternative solutions to prevent and relieve homelessness, particularly through the Private Rented Sector (PRS), with applicants preferring an offer of statutory temporary accommodation (TA) as an interim home until an offer is made of a social tenancy.
- 3.5 This results in applicants facing long periods in temporary accommodation which not only fails to provide any form of long-term secure housing but adds

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<sup>1</sup> This document is a revision of the policy formerly entitled '***Policy for determining the suitability of Temporary Accommodation/Private Rent Sector Offers***' which was published in 2015.

to the budgetary pressures arising from the use of temporary accommodation. Other local authorities both in London and elsewhere, have promoted a different service culture to broaden service user expectations and are experiencing greater take-up of PRS with correlated reductions in the use of temporary accommodation. The Transformation Programme intends to reduce the use of temporary accommodation.

- 3.6 The temporary accommodation budgetary pressure is compounded by temporary accommodation rents being set at Housing Benefit Local Housing Allowance (LHA) rates. The Council can only claim back Housing Benefit through the government's subsidy scheme at 90% of the January 2011 LHA rates. For example, where a single homeless adult is placed into 1 bedroom self-contained temporary accommodation, the amount of Housing Benefit subsidy that the council can claim back from the government is limited to the one-bedroom self-contained Local Housing Allowance (LHA) rate as it was in January 2011 for that geographical location. This often means that the amount the council receives back in subsidy is lower than what the council pays out to the homeless applicant in Housing Benefit to cover the rent which is set at the 2019/20 LHA rates. On average, the subsidy loss for temporary accommodation in Tower Hamlets is £58.38 per week for accommodation with studio-4 bedrooms and £120 per week for bed and breakfast accommodation.
- 3.7 The government's Benefit Cap also adds to revenue income loss (there were around 120-140 households in TA subject to the Benefit Cap at a conservative estimate at the start of the pandemic).
- 3.8 Taking the subsidy position into account, the Housing Options service would be overspending by considerably more if the budget was not being topped up by income from rents from buybacks and other ring-fenced intervention-specific homelessness grants from government.
- 3.9 The Council has a legal responsibility under the Homelessness Reduction Act 2017 (HRA) to prevent and relieve homelessness.
- 3.10 The Council under HRA owes households that are within 56 days of losing their home a 'Prevention Duty' (s.195) and owes households that are homeless the 'Relief Duty' (s.189B). Discharging the respective duties obliges the Council to take reasonable steps to either prevent or relieve the household's homelessness. The council works on a range of fronts to prevent and relieve the homelessness of residents. Preventative steps can include mediating with friends and relatives or landlords and tenants to sustain existing accommodation, including money and budgeting advice for those facing eviction due to rent or mortgage arrears, Steps to relieve homelessness can include help with finding an alternative home, such as private rented accommodation, or supported or sheltered housing.
- 3.11 The Council is aware that it is not meeting the public policy outcomes of HRA as well as other LAs. The Council's performance in preventing homelessness since the introduction of the HRA has scope for improvement, when

compared to the London trend as well as the national trend. Prior to the Covid pandemic, the Council's rate of successful homelessness prevention was 44% in 2019/20, which was below the figure for London (51%) and England (58%). (Source: DLUHC). There was comparative under-performance in this period in preventing the homelessness of single parents - 17% in LBTH, as against 30% in London and 29% in England. The Council was also behind in its use of the private rented sector (PRS) to combat homelessness – 41% of successful homelessness prevention in London resulted from providing an alternative home in the PRS and 28% nationally, whilst the council success rate was 17%. (Source: DLUHC)

- 3.12 The onset of the coronavirus pandemic in March 2020 caused a change in the profile of homelessness demand. The government's enactment of a ban on household evictions combined with the 'Stay at Home' Public Health guidance saw a marked decline in family homelessness, with a national reduction of 18.5% in households that were owed a prevention duty in Q3 2020/21, linked to a 50% decrease in threatened homelessness where the cause was service of an eviction notice to end an Assured Shorthold Tenancy. England in this period saw a 14% reduction in homelessness for households with children.
- 3.13 Meanwhile, the number of single people in temporary accommodation rose significantly because of the 'Everyone In' initiative to ensure those rough sleeping and those at risk of rough sleeping were off the streets. In Tower Hamlets, around 260 single adults were given emergency accommodation by Tower Hamlets. As a result of the changing profile of homelessness, temporary accommodation usage by local authorities in England had increased by 8% in Q3 2020/21. The main cohort of applicants entering TA being single person households which increased by 45%, while nationally households in temporary accommodation with children decreased 4.6%.
- 3.14 The national eviction ban ended on 31st May 2021, with a phased return to pre-pandemic eviction notice periods from 1st October 2021. This is likely to result in a significant rise in family homelessness with the ban ending. The Housing Options Service has undertaken preparation for the lifting of the ban on evictions and has devised a range of measures to manage the anticipated surge in demand that this may bring (see Appendix 4).
- 3.15 The Homelessness Transformation programme aims to improve outcomes and reduce the expenditure by instigating earlier 'upstream' intervention work. This would be coupled with greater use of the private rented sector to find alternative homes for single people and families. Upstream prevention will be the primary means of achieving a higher rate of homelessness prevention, which in turn will also reduce the council's use of Temporary Accommodation (TA) and deliver financial savings. Increasing income collection rates and reductions in use of costly TA (when TA is needed) will also reduce expenditure.

## **Objectives of the Homelessness Transformation Programme**

3.16 The objectives of the Homelessness Transformation programme are to:

- Increase 'upstream' early homeless prevention. Upstream prevention includes undertaking mediation with landlords and hosts to help households retain their existing home, minimising disruption to schooling and employment, and enabling households to benefit from ongoing support from local community, personal networks and local service provision. It also reduces the use of costly temporary accommodation.
- Increase the use of the Private Rented Sector (PRS) which is often the most viable option, given the acute shortage of social housing or alternative housing options, to help households whose homelessness isn't prevented to settle into a new home suitable to their needs, and keep to a minimum the upheaval and stress that comes with being homeless and the uncertainty of not having a place to call home.
- Improve timely decision-making and case management to provide clarity and certainty to those who require housing support, achieve better outcomes and minimise unnecessary time spent for applicants in temporary accommodation. At present, there are circa 1000 households in temporary accommodation awaiting a decision.
- Reduce the use of the most expensive TA, and increasing income collection, and the rate of move-on from TA. There are at present circa 1800 households in temporary accommodation to whom the Council owes the 'main homeless' duty. 90% of this cohort, through the use of the Council's powers under homelessness legislation, could potentially have the homelessness duty discharged by the offer of suitable accommodation in the PRS.

3.17 Another contributing factor to high TA numbers is timely decision-making and casework management. Delays in decision-making can result in households remaining in TA longer than is necessary; unmanageable caseload levels can mean important support for households to prevent and relieve homelessness not being provided as well as ensuring compliance with statutory requirements.

3.18 The programme seeks to improve the timeliness of decisions and to facilitate an increase in applicants moving on from TA. This will necessitate that caseworkers make timely decisions on an applicant's homelessness status to ensure that households, where appropriate, can exit TA. There are currently 40% of households in temporary accommodation who have an open case

pending a decision on their homelessness status. The Housing Options service will in this respect, be building on work already being undertaken to clear existing backlogs of homeless cases generally (reduced to 166 cases from 850 at start of 2021).

- 3.19 The programme is also seeking to accelerate the move-on of families or vulnerable adults who are owed the main homelessness duty into either the PRS or social housing, or into supported hostels for vulnerable adults. This cohort represent around 60% of households in TA who are currently owed 'the main housing duty' and therefore no longer need to remain in TA.
- 3.20 It will also focus on increasing options and move-on from TA for benefit capped households, this will be achieved by officers supporting benefit capped households to access employment opportunities. Once over the employment threshold, the benefit cap is no longer applicable and these households will not be reliant on subsidy to top-up their rent. It also supports the council's wider work to support families into employment as a means of tackling poverty and increasing household incomes.
- 3.21 Officers will utilise projects such as Local Space to achieve move-on's from TA by benefit capped households. 100% of properties procured via Local Space are ring-fenced to Housing Options and the rents are set at the January 2020/21 LHA, so on average, £59.84 less per week than the 2021/22 LHA for accommodation with 0-4 bedrooms.
- 3.22 Working with Beam, a specialist employment service for homeless households paid by results, the Programme will aim to get 27 benefit capped households into employment in Year 1.
- 3.23 The programme intends to deliver efficiencies, income, and other measures to make savings by:
  - Reducing the use of the most expensive TA
  - Ending use of the 100 most expensive TA units and then the next 100, etc. Among the most expensive are B&B (£11.6k p.a. per household) and self-contained nightly paid accommodation (SCNP) (£17.7k p.a. per household).
- 3.24 The Transformation programme also intends to maximise income collection and reduce rent arrears. The Temporary Accommodation income collection rate target will be increased annually by 1.5% from 2021/22. The income collection rate at the end of the financial year 2020/21 was 85.57% (75.83% HB/ 9.74% cash receipts – this figure fluctuates week by week). At the present time, the total of rent arrears for households in Temporary Accommodation is £14m (of which £6.5m is current debt with £7.5m owed in former tenant arrears for previous temporary accommodation placements).
- 3.25 The programme will be looking to reduce the Private Leased Accommodation management charge and convert placements in temporary accommodation to

Assured Shorthold tenancies. This will be achieved by entering re-negotiations with accommodation providers for in-borough Private Leased Accommodation to generate a saving with landlords – asking landlords to convert a property from temporary accommodation use to a non-statutory Assured Shorthold Tenancy status. This means that families could remain in properties where they have been placed, reducing further disruption caused by multiple moves.

3.26 To reduce the dilapidation costs which the council incurs through the use of temporary accommodation, officers will be looking to fix item costs and also to make adjustments to the licence agreement so that households that have damaged accommodation can be recharged.

3.27 The Homelessness Transformation Programme will require investment by the council which is necessary for the Service to increase its upstream prevention activities. The investment will increase both staffing capacity and improve and enhance the preventative tools available to officers. Failure to invest will prevent the transformation of the service. Consequently, the council will lose an opportunity to embed a preventative service approach to homelessness which is aligned to the Council’s Homelessness Reduction Act responsibilities and will be unable to realise the savings from the reduction in the council use of temporary accommodation.

3.28 No savings are expected to be achieved in the first year of the programme which will focus on mobilising the programme and implementing processes, systems, and new ways of working. The effects of these changes are expected to generating a saving in the second year (£0.25m) with the bulk of the net savings (£1.75m) being realised in the final year of the programme.

<b>Financial Impact:</b>	Current Budget 2020-21	Savings/Income 2021-22	Savings/Income 2022-23	Savings/Income 2023-24	Total Savings/Income
Budget (£000)	34,537	-	(250)	(1,750)	(2,000)

<b>Staffing Impact (if applicable):</b>	Current 2020-21	FTE Reductions 2021-22	FTE Reductions 2022-23	FTE Reductions 2023-24	Total FTE Reductions
Employees (FTE) or state N/A	N/A	N/A	N/A	N/A	N/A

3.29 The Homelessness Transformation Programme Board has strategic oversight of the programme and is responsible for delivering the aims of the programme and benefits realisation. The Board which meets monthly comprises senior management from Housing Options, Homelessness, Temporary Accommodation and Procurement, and Housing Benefit. The chair is the Council’s Divisional Director of Housing and Regeneration, who is the programme sponsor and senior responsible officer (SRO).

- 3.30 The Corporate Director for Place is regularly briefed on the programme. The Cabinet Member for Housing meets monthly with Board members to review progress.
- 3.31 The Council's Corporate Portfolio Management Office (CPMO) have provided guidance on programme design and initiation and good practice mentoring. The CPMO are also working with the Housing Options Service on wider business improvements, and have project managed the service's improving customer access project since May 2020.
- 3.32 Feedback has been positive from DLUHC officials who had a formal presentation of the programme by officers in April 2021. DLUHC have said, that overall, it is really encouraging to see the plans the borough has made and the commitment to delivering them. The HAST team at DLUHC have agreed to provide ongoing support and challenge during the life of the Programme.

### **Homelessness Transformation – Progress so far, future milestones**

- 3.33 The Homelessness Transformation Programme was launched in April 2021. The first year of the programme is focussed on mobilisation and establishing systems. Key milestones delivered since the launch:
- Invest to Save team recruited or appointments underway
  - Baseline multiple data sets sourced
  - New appointment system introduced to better respond to upstream prevention and homelessness crisis
  - Casework reduction targets set and caseloads reducing
  - Backlog of pre-2020 cases reduced to 270 cases
  - Training strategy for staff outlined
  - New management panels agreed to oversee officer booking requests for TA and TA move-on
  - All TA residents written to regarding intention to expedite move-on, likely to be PRS
  - TA decant in Merton being used to pilot new TA move-on approach
  - IT changes, initial scoping undertaken
- 3.34 Forthcoming milestones for 2021/22:
- Focus on homelessness casework standards and quality outcomes
  - Improve upstream notification from partners and joint-working
  - Implement end of Eviction Ban action plan
  - Take forward staff training programme
  - Increase Capital Letters PRS procurement capacity
  - Commission out of borough PRS resettlement floating support
  - Introduce facility for online viewings of PRS properties
  - Commission short PRS marketing video and pre-tenancy training
  - Customer charter – our PRS offer
  - Explore good practice, e.g. Haringey 'Find Your Own' scheme

- TA control measures and move-on panels commenced
- Service user feedback mechanisms introduced, undertake Mystery Shopping exercise
- IT improvements – take forward short-term changes; specify wider requirements, consider options and investment decisions.
- Business process improvements identified and implemented working with Corporate Business Analyst.

### **The Revised Homelessness Accommodation Placement Policy**

- 3.35 To facilitate the changes which the Homelessness Transformation intends to make, officers have developed a revised Homelessness Accommodation Placement Policy (see Appendix 1). This policy is required by law and has been updated to reflect the Homeless Reduction Act (HRA) 2017 duties which are missing from the existing policy.
- 3.36 To help homeless households to evaluate the pros and cons of often limited options and to promote choice, the revised policy also details a new approach of providing a maximum of 3 offers of private rented sector accommodation. This is more generous than the approach practiced by most councils in London and goes over and above the statutory minimum. Under statutory provision, the council can discharge its HRA duties in a number ways, with a final offer of accommodation being one such way. In some cases, there isn't a requirement in law to make any offer of accommodation. The new policy seeks to be more generous and would go some way to ensuring households are given choice of a new home in the PRS.
- 3.37 Under this revised policy, households worked with upstream, to prevent their homelessness, will receive a maximum of 2 offers of suitable private rented accommodation, and a further 1 offer of suitable private rented accommodation to relieve homelessness should prevention fail. Households already at crisis stage are likely to receive 1 offer, reflecting the urgency of their situation.
- 3.38 Homeless households in temporary accommodation owed the 'main duty' (post-Localism Act) are entitled to 1 suitable PRS offer through the Localism Act PRSO (Private Rented Sector Offer) power. Households will be able to exercise their statutory right to review the suitability offers and duty discharge decisions.
- 3.39 The Council in applying the policy will be bound by homelessness legislation which is stringent on the type of tenancy, property and management standards, and geographical location that local authorities need to consider for an offer to be regarded as 'suitable'. Statutory criteria will be applied to ensure those who may have a need to remain in Tower Hamlets (such as the requirement to receive specialist medical treatment unavailable outside the borough or due to social services safeguarding concerns) are offered PRS accommodation locally.

- 3.40 The new PRS offer policy does not guarantee an offer of private rented sector accommodation will be made. The housing needs of some households may be in short supply in the PRS stock – such as wheelchair adapted housing - and may need to be met through the social housing stock. For those in crisis to whom the council owes no housing duty under homelessness legislation, the statutory Relief Duty time frame - 56 days – may expire without a suitable offer becoming available, though the council may exercise its discretion under the Homelessness Reduction Act to extend the Relief Duty and continue to support the applicant.

In tandem with promoting the PRS as an attractive, realistic option and to support the necessary culture shift, it is also proposed to issue statutory notices to end duties to those deliberately and unreasonably refusing to co-operate with reasonable homelessness prevention measures. Statutory written warnings will be issued to the applicant prior to ending the duty to give the applicant the opportunity to re-engage and co-operate with the reasonable steps. Safeguards will be put in place to ensure the support needs of applicants are considered.

### **Improving Customer Access - the Customer Access Project**

- 3.41 As of March 2020, in response to social distancing and to minimise the risk of spreading infection, Albert Jacob House closed to the public. The council's Housing Options team were provided with phones and laptops to enable them to work from home. During this time officers transitioned to conducting interviews via telephone and used zoom and email as the main means of to contact clients, with limited face-to-face interviewing taking place.
- 3.42 The Housing Options Service has also embarked on a major customer access improvement project. The aims of the Customer Access Project have been:
- to keep the public and staff safe during the period of the corona virus, lessening the volume and regulating the flow of people needing to attend for a face-to-face service, enabling appropriate social distancing in the public area of council buildings.
  - to introduce a planned appointment system for homeless households, engaging with households either virtually on zoom or phone interview, minimising unplanned office presentations. The appointment system began in May 2021. This is more convenient for households, avoiding long and unnecessary queuing. It is a more efficient use of caseworker time, enabling upstream early intervention to take place separately from responding to emergencies, thus increasing time that can be spent to successfully prevent and relieve homelessness and to thus reduce the use of TA.
  - to improve the telephone service with sufficient staff resources, ensuring that they had the right skills set. A new phone system was

developed with an automated voice greeting which directs callers to relevant web content, sending web links free to service users' mobile phones and with text and a sub-menu of press-button options to access different areas within the Housing Options Service. The new phone system began in July 2021 and enables people to obtain assistance over the phone (for Lettings and Homelessness enquiries) and this provision reduces the need for service users to attend the office.

- to improve Housing Options content on the council's website. The project sought to make sure that our content is relevant and easier to find and that service users can navigate between pages to aid self-help. Interactive sections have been introduced on the Council's website which assist in screening demand by directing individuals to web resources where relevant and directing others who are homeless or threatened with homelessness to self-refer and self-book appointments with the service online. Service users will be able to upload documents electronically through an online customer portal. The new online journey will enable people to get the help they need in a timely and appropriate way without needing to come into the office or delaying getting help. The completion of the online customer journey is scheduled for November 2021.
- to make continued provision for those for whom emergency office presentations will continue to be appropriate, such as those fleeing Domestic Abuse. These groups need a safe welcoming environment with appropriate social distancing. In June 2021, the Housing Options service successfully relocated its face to face service to the Town Hall at Mulberry Place.

#### **4. EQUALITIES IMPLICATIONS**

- 4.1 The revised Homelessness Accommodation Placement policy takes into account the provisions of the Homelessness Reduction Act (2017) and how the council, as a local housing authority, will allocate accommodation in the private rented sector to prevent and relieve homelessness. The policy documents the existing approach currently used to determine what will be taken into account when considering whether accommodation is suitable and how households are prioritised for an in-borough placement of temporary accommodation (TA) or the Private Rented Sector (PRS).
- 4.2 Aside from being revised to take into account more recent legislation and caselaw, the revised policy includes an increased number of offers that will be made to applicants and households to prevent or relieve their homelessness which goes above and beyond the statutory minimum under the Homelessness Reduction Act (2017). The new offer will introduce a maximum of three offers of settled accommodation within the Private Rented Sector which is beneficial to all applicants and households irrespective of any

protected characteristics that they identify with. In determining where to place occupants, full case-by- case consideration will be given to the household's housing needs and individual circumstances, including health, welfare, social, and financial situation as well as the costs that the household will incur when determining the type of and suitability of accommodation offered to them.

- 4.3 This policy has been subject to an Equalities Impact screening exercise and it has been concluded that the policy neither disproportionately or adversely impact across any protected groups (see Appendix 3).

## **5. OTHER STATUTORY IMPLICATIONS**

- 5.1 There are no statutory implications identified at this stage. The council's work to date and going forward is commensurate with all its best value, environmental and safeguarding responsibilities.

## **6. COMMENTS OF THE CHIEF FINANCE OFFICER**

- 6.1 This report provides an update on progress made to date on the Homelessness Transformation programme and seeks approval for a policy for allocating accommodation to Homeless people, setting out the proposed new criteria of three private rented sector offers and the procedure for those clients that do not engage or accept this offer.
- 6.2 Although there are no financial implications directly emanating from this report, the transformation programme of which the allocation policy forms a part is an invest to save project that is forecast to deliver revenue savings of £2m over the next three years, £0.25m in 2022/23 and £1.75m in 2023/24. Additional costs incurred in implementing this transformation are being met from the Flexible Homelessness Support Grant reserve. These savings form part of the Medium-Term Financial Strategy.
- 6.3 There is a need for the Homelessness service to reduce its costs. The service is spending in line with budget but is currently supported by £6.5m of grant funding which is not guaranteed in the future and the adverse impact of the Housing Benefit Subsidy loss (currently forecast at £3m after growth was added) being funded from general Covid-19 grant. This will result in a significant overspend in future years when funded from the General Fund unless mitigated through the transformation programme.

## **7. COMMENTS OF LEGAL SERVICES**

- 7.1 This report provides Members with an update on the Homelessness Transformation Programme. There are no immediate legal implications in respect of this update.
- 7.2 The report also seeks approval from Members for the Council's revised Homelessness Accommodation Placement policy which has been updated to reflect changes brought into effect by the Homelessness Reduction Act (2017)

which placed duties on local authorities to prevent and relieve homelessness for applicants. The policy details the way in which the Council will meet its statutory duties to homeless applicants including housing applicants into suitable accommodation in the private rented sector. The policy will assist the Council to comply with its statutory duties under the homelessness legislation.

- 7.3 There is no statutory duty for the Council to consult on the updated policy. Consideration has been given to undertaking a non-statutory consultation, however officers consider this is not necessary as the changes to the policy do not adversely affect any group. The changes to the policy provide a benefit to homeless applicants by increasing the number of private rented sector accommodation offers with the result that homeless applicants move into settled accommodation as soon as possible and spend less time in temporary accommodation. Applicants will retain their right to a statutory review of the suitability of any offer of permanent accommodation in the private rented sector.
- 7.4 When deciding whether or not to proceed with this policy, the Council must have due regard to the need to eliminate unlawful conduct under the Equality Act 2010, the need to advance equality of opportunity and the need to foster good relations between persons who share a protected characteristic and those who don't (the public sector duty). An equality screening exercise has been undertaken in respect of the Homelessness Accommodation Placement Policy which concluded that no group with a protected characteristic will be adversely affected by the policy.

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## **Linked Reports, Appendices and Background Documents**

### **Linked Report**

- None

### **Appendices**

- Appendix 1 – Homelessness Accommodation Placement Policy
- Appendix 2 – Measures for the lifting of the ban on evictions
- Appendix 3 – EIA Checklist

### **Background Documents – Local Authorities (Executive Arrangements)(Access to Information)(England) Regulations 2012**

- None

### **Officer contact details for documents:**

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