

Cabinet 10 July 2024	 TOWER HAMLETS
Report of: Julie Lorraine – Corporate Director for Resources	Classification: Unrestricted
Approval of the revised Homelessness Accommodation Placement Policy and the new Homelessness Accommodation Procurement Strategy.	
Approval to commence pilot projects: (1) Cost of living grant scheme and (2) Find your own PRS scheme.	

Lead Member	Councillor Kabir Ahmed, Cabinet Member for Regeneration, Inclusive Development and Housebuilding
Originating Officer(s)	Karen Swift – Director of Housing Abul Kalam – Service Manager, Housing Management & Procurement
Wards affected	All wards
Key Decision?	Yes
Reason for Key Decision	Significant impact on wards
Forward Plan Notice Published	01/02/2024
Exempt information	N/A
Strategic Plan Priority / Outcome	2. Providing homes for the future

Executive Summary

This report recommends the approval of the council’s revised Homelessness Accommodation Placement Policy.

The existing policy, which was effective from October 2021, is no longer fit for purpose given the current increase in homelessness, lack of availability of affordable and suitable accommodation in the borough and recent changes in legislation.

This report also seeks the approval of the Homelessness Accommodation Procurement Strategy, which sits side by side with the Homelessness Accommodation Placement Policy. The strategy clearly sets out the council’s approach as to how officers will procure available housing stock to discharge the council’s statutory

homelessness duties and responsibilities. The strategy will ensure that the council follows current legislation and provides clear guidance for staff to ensure affordability and suitability of accommodation which is procured for this purpose.

This report also seeks the approval of two pilot projects, (1) Cost of Living Grant Scheme and (2) Find Your Own PRS Accommodation Grant scheme, both of which will be integral to the council's ability to prevent and relieve homelessness and reduce numbers in temporary accommodation, particularly bed & breakfast and commercial hotels.

In addition, this report seeks approval from the Mayor and Cabinet to delegate authority to officers to administer and issue grants to residents under the Cost of Living and Find Your Own PRS Accommodation Grant schemes and to further, delegate authority to the Director of Housing to extend the pilots or make them permanent prevention initiatives, subject to available finances and in consultation with the Mayor and Lead member.

Recommendations:

The Mayor in Cabinet is recommended to:

1. Approve the council's revised Homelessness Accommodation Placement Policy (Appendix A) and new Homelessness Accommodation Procurement Strategy (Appendix B).
2. Delegate authority to the Corporate Director of Housing and Regeneration should any further amendments be required because of new legislation or case law in consultation with the Mayor and Lead Member.
3. Approve the two pilot schemes, (1) Cost of Living Grant Scheme and (2) Find Your Own PRS Accommodation Scheme, and to register both on the council's grants register.
4. Delegate authority to officers to administer and issue grants to residents under the Cost of Living and Find Your Own PRS Accommodation Grant schemes.
5. Delegate authority to the Director of Housing to extend the pilots or make them permanent prevention initiatives, subject to available finances and in consultation with the Mayor and Lead member.

1 REASONS FOR THE DECISIONS

- 1.1 The council has a statutory homeless duty.
- 1.2 Failure to revise the Homelessness Accommodation Placement policy leaves the council open to legal challenge and judicial review. The availability of suitable accommodation for those requiring temporary accommodation is becoming increasingly challenging. By remaining unable to procure suitable temporary accommodation across a wider geographical area, the council remains reliant on the use of expensive bed and breakfast and commercial hotels in the borough and surrounding areas. This is detrimental to the health and well-being of residents and costly to the council.
- 1.3 Bed and breakfast accommodation and commercial hotels present

significantly higher costs to the council which currently average at £982.10 per week. Suitable and more affordable accommodation can be found outside of the current parameters set out in the current policy. The current policy has rigid fixed travel time of up to 90 minutes away from the borough.

- 1.4 Revising the policy in light of legislative and case law establishes a transparency and openness of the council's approach in how accommodation for homeless households is allocated, including but not limited to, why some residents are placed in the borough, while others are not.
- 1.5 The Homelessness Accommodation Procurement Strategy sets out the council's approach as to how accommodation will be procured to discharge the council's statutory homelessness duties and responsibilities. It will ensure that the council follows current legislation and provides a reference point for staff to make their decisions.
- 1.6 The two new proposed pilot grant programmes - the Cost of Living Grant and the Find your Own Private Rented Accommodation scheme are incentives to encourage host households to allow family members to remain and for those being evicted from private rented a grant to find alternative private rented accommodation.
- 1.7 The cost of living grant should cover the majority of the costs for the main householders of keeping non-dependant household members in the family home.

2 ALTERNATIVE OPTIONS

- 2.1 Failing to amend the Homelessness Accommodation Policy places continued and significant pressure on the council to find suitable temporary accommodation.
- 2.2 By not amending the policy and continuing to procure expensive Temporary Accommodation due to the continuation of a rigid fixed travel time from Tower Hamlets, there will remain a significant housing benefit subsidy loss as the council is only able to secure 90% of rent in temporary accommodation at 2011 LHA levels. This leaves a significant shortfall in the money secured to cover cost of the accommodation.
- 2.3 Landlords in London are now opting for guaranteed rents, so properties will continue to be procured at high rates if the council continues to focus on just procuring accommodation both temporary and in the private rented sector in the borough and greater London alone.
- 2.4 Failure to approve the Homelessness Accommodation Procurement Strategy would mean that clear direction to officers in the procurement of suitable and affordable accommodation would remain a challenge and at times undeliverable.

- 2.5 Not approving the 'Find Your Own' Scheme or the Cost of Living Grant for residents who are homeless or at risk of homelessness will mean that those residents who would be empowered and able to source their own accommodation or families helped with expenses to host a family member would be reliant on the council homeless services for finding them somewhere to live.

3 DETAILS OF THE REPORT

- 3.1 The council has a statutory duty to provide temporary accommodation as emergency housing for homeless households where a homelessness duty may be owed.
- 3.2 Temporary accommodation takes two forms – In the first instance, it is emergency accommodation (called stage 1), for use during the relief stage of homelessness and while a household's homeless application is being assessed.
- 3.3 The second type of temporary accommodation is longer-term, (stage 2). This accommodation is for households where the council has accepted a housing duty to them and is provided until suitable longer term accommodation is available.
- 3.4 Stage 1 accommodation is generally 'nightly booked' as it is only intended to be for short periods of time and is more expensive than longer term Stage 2 accommodation.
- 3.5 The council has arrangements with local landlords for accommodation and uses its own stock and obtains accommodation from partner registered providers (housing associations) to provide Stage 2 accommodation. In addition to these leased forms of accommodation, the council makes Private rented sector offers ("PRSOs") to homeless households where it has accepted a housing duty to them of private rented accommodation on the basis of a fixed term Assured Shorthold Tenancy. The council makes these offers to provide people with sustainable, affordable, and more settled accommodation as an alternative to a long wait in temporary accommodation for social housing.
- 3.6 Rising rates of homelessness not only in the borough but across London post pandemic and resulting from the national cost of living crisis has seen a soaring demand for both temporary and private rented sector accommodation within the borough.
- 3.7 At the same time, the supply of in-borough accommodation has also become unaffordable for low-income households. Keeping homeless households in temporary or private rented sector accommodation in the borough requires significant financial support from the council.

- 3.8 Given the financial constraints that the council finds itself operating in over the last few years, it is not financially sustainable to place all homeless households within the borough. The council will therefore be allocating temporary accommodation in line with its new Homelessness Accommodation Placement Policy. This means that the council may look beyond its own borough and the Greater London area to meet its legal duty to secure suitable accommodation, in order to procure suitable and affordable homes.
- 3.9 If the council was to find itself in the position where a steady supply of affordable temporary accommodation becomes available due to significant government investment, changes to welfare benefits and Local Housing Allowance, then a review of the policy will be undertaken.

Homelessness Accommodation Policy

- 3.10 The revised Homelessness Accommodation Placement Policy clearly sets out the council's approach to using available housing stock to discharge the council's statutory homelessness duties and responsibilities.
- 3.11 The policy will ensure that officers follow current legislation and provides a reference point for staff to make their decisions. The revised policy replaces the existing policy and will be applied to both new and existing clients from the date of implementation.
- 3.12 The material change in the new policy against the existing policy is the removal of the 90 minutes travel time back to the borough from where the placement is made, whether temporary accommodation or private rented sector accommodation.
- 3.13 There are 2880 households in temporary accommodation who are placed in the borough, outside of the borough and outside of London.
- 3.14 With regard to private rented accommodation for discharge of duty, prior to 2022 there was a steady supply of in-borough private rented accommodation available, but this has significantly reduced. The council has increasingly been using out of borough provision and this is set to continue.

New private rented lets	In-borough	Outside of Borough
2020/21	175	271
2021/22	194	306
2022/23	53	225
2023/24	31	211

- 3.15 Being able to procure outside of Greater London, for the purposes of temporary and private rented sector accommodation, will make the accommodation affordable for the resident and the council.
- 3.16 Under the Homelessness Code of Guidance, families should be in bed and

breakfast or hotel accommodation for up to a maximum of 6 weeks. This is significantly hard to achieve given availability of accommodation in the placement areas that the current policy focuses on.

- 3.17 The significant change in the current policy and the proposed new Placement Policy is the removal of the 90 minutes journey time back to the borough from where a placement has been made.
- 3.18 The council will now use 'zones' when procuring and allocating temporary and private rented sector accommodation.
- 3.19 The zones have been set out below. Including these zones will enable the council to have a robust and clear policy and procedure on how properties are allocated. This policy will also serve to reduce the number of judicial reviews brought against the council when being challenged on suitability. Having zones, will give the council greater control on allocating accommodation, while being able to audit placements made for transparency. Areas in zone C are subject to change considering supply in a specific area or county.
- Zone A – located in the borough of Tower Hamlets
 - Zone B – located in Greater London
 - Zone C – located outside Zones A and B but in the neighbouring counties and districts of Essex, Hertfordshire, Kent, Surrey, Berkshire, and Buckinghamshire
 - Zone D – located outside of Zones A, B and C
- 3.20 The policy has significant safeguards in relation to priority for in borough placements, these are set out in paragraphs 3.1 – 3.5.

4 Homelessness Accommodation Procurement Strategy

- 4.1 Officers endeavour to procure good quality accommodation however, the council recognises that more could be done to ensure that the accommodation remains of good quality during the residents' occupation. Some landlords have recognised the high demand for accommodation by local authorities and have allowed the quality of accommodation to drop. This includes their responsiveness to repairs that need to be carried out to ensure that accommodation supplied is in a good state of repair, including free from mould and damp.
- 4.2 To prevent deterioration of accommodation the council will review the current Temporary Accommodation lease agreements between the council and its accommodation suppliers, to ensure greater emphasis is placed on the landlord's responsibility to get repairs done, with a mechanism in place for the council to carry out repairs when the landlord does not. The landlord will then be recharged for any repairs directly from the monthly payment the council makes to the landlord.
- 4.3 The new strategy sets out that where a new supplier of Temporary Accommodation has been procured, a minimum of 3-5 of the supplier's properties will be inspected to ensure that the properties meet the council's property standards. When a household is moved into the temporary property, the allocated Housing Officer will conduct a settling in visit within 4 weeks of the

placement being made, to ensure that the household has settled into the accommodation and the area.

- 4.4 Two further visits will be made each year to ensure that the household is managing in the property and to ensure that any repairs are carried out where required. This will also assist the council in ensuring that households are using the temporary accommodation as their main and principal home and to prevent subletting and/or fraud.
- 4.5 When procuring settled accommodation in the private sector, all properties will be inspected and/or an online virtual inspection will be conducted to ensure that the property is suitable and meets our needs and to satisfy Article 3 of the Homelessness Suitability of Accommodation (England) order 2012. Other relevant legislation, including but not limited to, the Housing Health & Rating System and the Homes (Fitness for Human Habitation) Act 2018 (HFHHA) will also be considered.
- 4.6 Where a license is required to let a property, the council will ensure that all due diligence has taken place, including but not limited to, assurance that the appropriate licenses are in place and that checks are undertaken with the local authority where the property is located.
- 4.7 When procuring accommodation in areas where the council is likely to make regular placements because there is a sufficient supply of suitable and affordable accommodation, the following checks, assessments, and information will be made, this list is not exhaustive, and this is set out clearly in the Homelessness Accommodation Placement Policy from paragraph 3.1-3.7 and 6.1-6.7.
 - Providing information about local services, amenities, and facilities
 - How to register for a GP
 - How to apply for a school placement
 - Has good transport links back to the borough.
- 4.8 The strategy sets out the end to end processes for officers when they are procuring accommodation for homelessness households, including how to assist with ensuring that a household settles into a new area, where applicable, and that they are able to access the local amenities.
- 4.9 To further support households to move into accommodation outside of the borough, the council can provide assistance with removals and transport and assisting with providing white goods and furnishings, where required.

5 **Cost of Living Grant scheme (CoLG)**

- 5.1 The cost of living crisis has seen increases in the cost of essential basic living - food, energy, clothing, and fuel.
- 5.2 Friends and family evictions are the biggest cause of homelessness in the borough, a pattern repeated across London and England generally. Failure to

stem this reason for homelessness is consequently a major contributor to rising numbers of households being accommodated by the council in temporary accommodation.

- 5.3 The council is limited in what it can do to prevent homelessness where residents are asked to leave because friends and family are no longer able to or willing to accommodate them, as those being asked to leave have limited accommodation rights under the law. The main prevention solution is mediation with the householder for the residents to remain in the property, which is generally dependent on persuasion and appealing to the householder's goodwill.
- 5.4 In 2023/24, the government introduced cost of living payments to help low-income households partly or in full receipt of tax credits and welfare benefits of circa £300 per quarter. Additionally, councils are making payments using the Household Support fund from the Department of Work and Pensions. In Tower Hamlets, this fund is used to make grants to residents through the Resident Support Scheme which can help with short-term living costs like credit, food and gas/electric pre-payment meters and can also help in some circumstances with white goods and furniture.
- 5.5 Householders however who provide accommodation for friends or relatives do not receive financial help associated with having long-term guests. The current cost of living payments are not specifically focussed on financial support for hosting a family member(s) in a householder's home for long periods of time.
- 5.6 These expenses can include replacing beds and mattresses or convertible sofas or other forms of bedding through day to day use, replacing kitchen appliances or bathroom and toilet fixtures or living room furniture, or carpeting or redecoration due to extra wear and tear. There are also additional energy costs for heating, hot water, and electricity to charge devices or lighting in rooms; paying for space saving storage solutions; low cost respite holidays either for the guest boarders or the householder as respite from either party. Financial assistance to meet these costs at a time when household budgets are already overstretched could help to sustain hosting arrangements.
- 5.7 The new cost of living payment will be offered to householders who have evicted family members or guests on the premise that the family member or guest can return to the property and will remain in occupation either in the medium-term or the short-term while sourcing a viable medium to long term accommodation option.
- 5.8 The payments will be made for up to 12 months subject to the host continuing the arrangement from one quarter to the next. The amounts will vary in accordance with the bedroom need of the family member/guest who has been asked to leave.
- 5.9 The project will initially run as a pilot for 6 months pending review.

6 Find your own PRS scheme (FYO)

- 6.1 'Find Your Own' (FYO) PRS Accommodation Grant intends to incentivise homeless households to self-source PRS accommodation. FYO's have been long-established in a number of London boroughs such as Haringey and Barnet and have been found to work.
- 6.2 The "Find Your Own" PRS Accommodation Grant is only available to homeless households who find their own PRS accommodation where they have been already placed in Temporary Accommodation by the council or where the council owes a duty under homelessness legislation to provide the household with Temporary Accommodation (s.188, Housing Act 1996). These are households with a priority need for accommodation under homelessness law who are owed either a Prevention, Relief or Main Housing Duty.
- 6.3 The purpose and use of the Tower Hamlets FYO PRS Accommodation Grant is intended to assist eligible residents in meeting the costs associated with moving and resettling into a new PRS home, for example:
- to buy new furniture
 - pay for removal costs.
 - buy new school uniforms if the move means children need to change schools.
 - to help clear any previous debts that could hinder a move, such as outstanding arrears, to ensure keeping up with rent in the new home is not impacted.
 - engage in social / sporting activities in the new location.
 - other costs which would enable the resident to move in promptly and / or result successful tenancy sustainment.
- 6.4 Grant levels will vary based on the size of the property sourced, with larger grants reflecting the higher costs associated with securing and moving into larger-sized accommodation. The Grant recognises the market difficulties confronted by households trying to source affordable family-sized accommodation of which there is a severe shortage.
- 6.5 The use and payment of the Grant will be considered and managed in line with Tower Hamlets Adult Safeguarding procedures to ensure minimal risk of harm or exploitation to vulnerable individuals and families. Any concerns raised or noted regarding a particular individual or family will be considered on a specific case-by-case basis.

7 EQUALITIES IMPLICATIONS

- 7.1 An Equality Impact Assessment has been conducted to support the revisions to the Homelessness Accommodation Placement Policy and the new Homelessness Accommodation Procurement Strategy. While officers have had due regard to the council's Equality Duty in the development of the and strategy, the council has a range of other responsibilities including a duty to set a balanced budget.

- 7.2 The council is required to consider the value for money implications of its decisions and to secure best value in the provision of all its services. It is important that resources are allocated in accordance with priorities and that best value is achieved. The continued use of expensive temporary accommodation, the pro-longed use of nightly or bed and breakfast or commercial hotel accommodation in the borough is not sustainable on the public purse or to the benefit of residents who are placed in this accommodation due to a lack of affordable private rented sector accommodation in the borough.
- 7.3 It is evident that any risk of a disproportionately negative impact existing to one or more of the groups of people who share a protected characteristic under the Equality Act 2010 will be removed or reduced by implementing the actions detailed within the Impact analysis and by officers conducting of the suitability of accommodation test for all placements.
- 7.4 The necessary checks will be made to ensure that where placements are made outside of the borough and outside of greater London, the Housing Options Service will ensure that there are established communities whereby a diverse community can be catered for.
- 7.5 In assessing the suitability of an offer of accommodation, each case will need to be assessed on its own merits, considering both the nature of the property and the community that surrounds the property, to ensure that residents are not isolated in their new communities.
- 7.6 Where local accommodation is not possible, we will ensure that similar services are available to the resident in a new location and that support with the transition is available. Regular checks will also be made to ensure that there are adequate school placements, GPs available and any other support services required.
- 7.7 An Equality Impact Assessment has been completed to review and establish if there are any negative or disproportionate impacts on any of the protected characteristics that residents may identify with.
- 7.8 Householders currently providing accommodation for friends or relatives do not receive financial help associated with having long-term guests. There is currently no cost of living support available to residents hosting a family in their home for long periods of time. Financial assistance to meet these costs at a time when household budgets are already overstretched could help to sustain hosting arrangements and prevent and reduce the incidence of family and friends no longer willing or able to allow a homeless applicant or household to remain in the property.
- 7.9 The Find Your Own PRS Accommodation Grant Scheme will empower residents to take ownership and control over their housing options with more flexibility and choice in terms of location and type of property they source in the PRS. Those residents who receive a "Find Your Own" Grant payment should see that the payment help to reduce any financial barriers which prevented a resident from securing and settling into a new PRS tenancy. This in turn should

minimise the risk of the tenancy breaking down. The Grant supports long-term tenancy sustainment and fundamentally aims to reduce the risk of repeat homelessness which is costly to the council and disruptive to the resident and their household which will ultimately benefit all residents.

- 7.10 The use and payment of both grants will be considered and managed in line with Tower Hamlets Adult Safeguarding procedures to ensure minimal risk of harm or exploitation to vulnerable individuals and families. Any concerns raised or noted regarding a particular individual or family will be considered on a specific case-by-case basis.

8 OTHER STATUTORY IMPLICATIONS

- 8.1 This section of the report is used to highlight further specific statutory implications that are either not covered in the main body of the report or are required to be highlighted to ensure decision makers give them proper consideration. Examples of other implications may be:
- Best Value Implications,
 - Consultations,
 - Environmental (including air quality),
 - Risk Management,
 - Crime Reduction,
 - Safeguarding.
 - Data Protection / Privacy Impact Assessment.
- 8.2 The legislation and caselaw relevant to accommodation provision to which the new policy has regard to:
- Housing Act (1996) Part 7
 - Homelessness Reduction Act (2017).
 - Homelessness Code of Guidance for local authorities, particularly 'Chapter 17: Suitability of Accommodation'.
 - The Homelessness (Suitability of Accommodation) (England) Order (2012).
 - The Equality Act 2010
 - Localism Act 2011
 - Children Act 2004
 - Domestic Abuse Act 2021
 - Homelessness (Suitability of Accommodation) Order 2012
 - Relevant case law relating to affordability of accommodation in relation to suitability– notably, but not exclusively, the judgement of the Supreme Court in the case of *Samuels v Birmingham City Council* (2019).
 - Travel to school for children of compulsory age 'Department for Education Statutory Guidance for Local Authorities'
 - Tenant and Landlord Act 1985
 - Homes (Fitness for Human Habitation) Act 2018
 - Housing Health & Safety Rating System (HHSRS)

Other statutory implications

- Best Value Implications
- Safeguarding
- Healthy Child Programme

9 COMMENTS OF THE CHIEF FINANCE OFFICER

- 9.1 This report is seeking approval of the Council's revised Homelessness Accommodation Placement Policy. On top of this, the report also seeks approval for two pilot schemes, cost of living grant scheme and find your own PRS Accommodation scheme. The revised policy is aimed at reducing the cost of providing temporary accommodation and the pilot schemes at preventing homelessness occurring.
- 9.2 The Council has a statutory duty to provide suitable accommodation where an assessment results in a duty being owed. Demand for homelessness continues to increase, putting budgets under significant pressure and in 2023/24 is projecting to outturn with an adverse variance of £6.6m. The current homelessness accommodation placement policy restricts the locations within which clients can be accommodated. A lack of accommodation in borough and the Greater London area is resulting in significant numbers of placements in unsuitable bed and breakfast accommodation and commercial hotels at very high cost to the Council, with these placements lasting for significantly longer periods.
- 9.3 Where temporary accommodation clients are eligible for housing benefits, the Council will claim back rents that it has paid out from Central Government as part of the housing benefit subsidy system. Rents in borough are all significantly above Local Housing Allowance (LHA) rates and are paid in full. The Housing Benefit subsidy system caps the amounts that the Council can claim back to cover these rental payments at 90% 2011 LHA rates, resulting in the Council making a subsidy loss on each payment. In 2023/24, rental payments totalled £41.9m and the subsidy claimed back was only £29.2m, a subsidy loss of £12.7m (against a £7m budget).
- 9.4 Placing temporary accommodation clients further from Borough will reduce the rents to levels closer to or at LHA levels, reducing the Housing Benefit Subsidy loss. The table below is an illustrative example, comparing the weekly housing benefit subsidy loss of housing in borough with Southend and Luton.

	1 Bed (£)	2 Bed (£)	3 Bed (£)
Tower Hamlets	295.49	365.92	441.86
HB subsidy	216.00	270.00	315.00
HB subsidy loss	-79.49	-95.92	-126.86

Southend	138.08	182.96	230.14
HB subsidy	103.84	135	170.38
HB subsidy loss	-34.24	-47.96	-59.76

Luton	143.84	178.36	224.38
HB subsidy	103.84	124.61	150.38
HB subsidy loss	-40.00	-53.75	-74.00

- 9.5 Since the cost of living crisis, the Council has experienced a significant increase in the number of people presenting as homeless following friends and family evictions. Increasing food and energy costs have made it increasingly difficult to continue hosting friends and family members. In 2023/24, the government introduced cost of living payments to help low-income households partly or in full receipt of tax credits and welfare benefits of circa £300 per quarter. Householders however who provide accommodation for friends or relatives are not eligible for this funding. As a result, it is proposed to pilot grant payments for up to 12 months where hosts have recently evicted friends and family members, the aim being to allow them to continue accommodating friends and family members.
- 9.6 The grant payments will be assessed on a case by case basis and last up to 12 months. The level of payment will be based on bedroom need. The scheme should result in cost savings for the Council, with the grant payments preventing homelessness and the need for the Council to place the evicted person in expensive nightly booked accommodation. The level of saving is difficult to assess as it is dependent on the number of grants made and the size of the grants.
- 9.7 Find Your Own PRS Accommodation Grant intends to incentivise homeless households to self-source PRS accommodation. The grant is only available to homeless households who find their own PRS accommodation where they have been already placed in Temporary Accommodation by the council or where the council owes a duty under homelessness legislation. The grant is intended to assist eligible residents in meeting the costs associated with moving and resettling into a new PRS home.
- 9.8 Grant awards will again vary, depending on the size of the property being procured. This scheme will again result in cost savings for the Council, with the grant allowing the Council to discharge its homelessness duty. The level of cost saving will be dependent on the number of grants given and the size of the grants.
- 9.9 The grant schemes will be funded from the existing budget in the expectation that they will be self-funded by reduced homeless costs and potentially produce an overall saving

10 COMMENTS OF LEGAL SERVICES

- 10.1 The Housing Act 1996 provides the statutory background to the Council's duties with respect to preventing homelessness and providing assistance to people threatened with or actually homeless. The Homelessness Act 2002 amended the primary legislation to ensure a more strategic approach to preventing and

tackling homelessness by requiring housing authorities to formulate and publish a homelessness strategy.

10.2 This report sets out the challenges that the Council is currently facing with the provision of temporary accommodation and the revised Homelessness Accommodation Placement Policy sets out the council's approach to using available housing stock to discharge the council's statutory homelessness duties and responsibilities. The policy has been formulated taking into account legal advice on the potential challenges to the policy that the Council may face with a view to ensuring the policy limits the risk to the Council of successful challenges against decisions made using the guidelines set out in the policy. The revised policy will apply to both new and existing clients from the date of implementation.

10.3 The Homelessness Accommodation Procurement Strategy sets out the further steps that the Council will take to ensure that the accommodation offered to homeless applicants is fit for purpose and allows the Council to take a greater role in ensuring that they meet their statutory obligations and provide good quality accommodation. The grants scheme detailed in this report will support the Council's homelessness strategy.

Linked Reports, Appendices and Background Documents

Linked Report

- None

Appendices

- Homelessness Accommodation Placement Policy
- Homelessness Accommodation Procurement Strategy
- Equality Impact Assessment for the revised Homelessness Accommodation Placement Policy and the new Homelessness Accommodation Procurement Strategy
- Equality Impact Assessment Checklist for piloting 1) the Cost of Living Grant Scheme and 2) the find your own PRS Scheme Accommodation Scheme

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

- NONE

Officer contact details for documents:

Abul Kalam - Service Manager, Housing Management & Procurement