

Meeting Executive
Portfolio Area Housing and Housing Development
Date 18 January 2023



TEMPORARY ACCOMMODATION PROCUREMENT AND PLACEMENT POLICY

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1 PURPOSE

- 1.1 The purpose of this report is to highlight the proposed changes to the Temporary Accommodation Procurement and Placement Policy, pursuant to the Council's statutory Housing obligations. The policy has been updated to reflect changes in homelessness legislation and case law. The revised policy is set out in Appendix A to the report.
- 1.2 The report highlights the changing social and financial landscape and the likely demands this will place on the need for temporary accommodation.
- 1.3 Executive's commitment to meet the growing demand for homelessness provision is set out in the report. It highlights the unchanged approach to predominantly using council owned housing stock to provide temporary accommodation and to only use hotels or nightly let provision where necessary.
- 1.4 The policy approach centres on providing suitable interim accommodation to those for whom the Council owes a homeless relief duty and subsequent temporary accommodation to those who the Council accepts a main housing duty

to. Accommodation is provided for the duration of time taken to conduct and conclude homelessness investigations and determine and discharge any subsequent housing duty.

2 RECOMMENDATIONS

- 2.1 That the revised Temporary Accommodation Procurement and Placement Policy, as attached at Appendix A to the report, that has been updated to reflect legislative changes and case law, be approved.
- 2.2 That a review of service charges be undertaken to maximise income recovery and reduce operational burden.

3 BACKGROUND

- 3.1 Accommodation for homeless residents has been a continued pressure point for Council resources since 2018 (when the Homeless Reduction Act in 2017 came into effect). These pressures were exacerbated by the Covid-19 pandemic and the subsequent 'Everyone In' directive, issued to meet homeless accommodation requirements, during that time.
- 3.2 The situation in Stevenage mirrors the wider national picture regarding homelessness and temporary accommodation, with the number of households in temporary accommodation rising by 49% nationally between 2015 and 2022.
- 3.3 In 2019, the Executive approved the Council's Homelessness & Rough Sleeper Strategy 2019-24. The strategy outlined four key priorities in order to meet the growing demand for homelessness provision and to ensure that which is provided, is suitable and has adequate support in place to prevent repeat homelessness. The strategy further set out the need to increase the volume of accommodation available; both for the homeless client group and for general needs accommodation, in order to provide settled housing for homeless duties to be discharged into.
- 3.4 To achieve the priorities set out in the Homelessness and Rough Sleeper Strategy, the Temporary Accommodation Service continues to work with Investment and Housing Development. Since April 2020, they have collaboratively sourced 40 additional properties; increasing our operational unit supply by 75 (of which 27 are currently used as Housing First).
- 3.5 In July 2022, Executive's approved the Housing First Business Plan which outlined the approach for rough sleepers until the end of 2023/24, when the current fixed-term funding streams ended. Since April 2020, 134 individuals have been accommodated in total and been provided with some level of support based on need and 57 individuals have successfully moved on to permanent accommodation or further supported accommodation. These were all clients who were rough sleeping or at risk of rough sleeping in Stevenage. As a positive consequence, there had been a notable reduction in rough sleeping across the town. The official rough sleeper count for Stevenage was 14 in 2021 and 8 in 2022. The development of the Housing First service demonstrates the council's commitment to supporting people who we do not have a homelessness duty to accommodate.

- 3.6 The Council's continued collaborative work with both Herts County Council and accommodation providing partners at a strategic and operational level, further contributes towards the aspirations of the Homelessness and Rough Sleeper Strategy 2019-2024 to eradicate rough sleeping within Stevenage on a long-term basis. The council will continue to support initiatives such as the provision of 3 additional crash pad places for young people, jointly funded by Herts County Council and all Hertfordshire districts and borough authorities.
- 3.7 The above work has supported a significant reduction in Bed and Breakfast placements in Quarter 3 of 2022/23 and work is currently underway at two further sites, Archways House and Dunn Close, which will deliver units as follows:

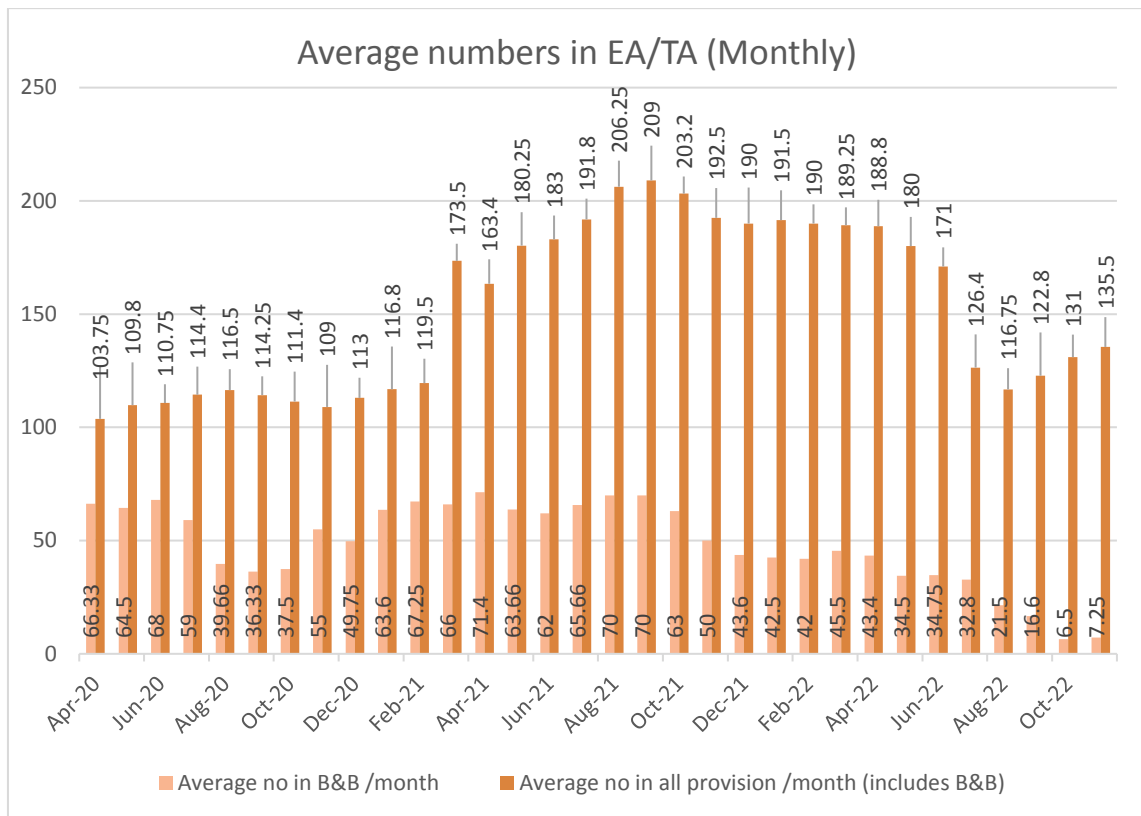
Location	Type	Units	Operational by
Archways House	Shared	23	before Q4 end 2022/23
	Self-Contained	0	
Dunn Close	Shared	21	Before Q4 end 2023/24
	Self-Contained	6	Before Q4 end 2023/24
Total Units Expected 2023/24		50	<i>Both sites will have on site office for staff</i>

- 3.8 Bed and Breakfast provision is diminishing; both locally and nationally, as the Home Office take up exclusive use for Asylum Seeker placements. As such, if the Council fails to source enough suitable in-house provision to meet the needs of its applicants, at the rate at which demand increases over the coming year and beyond, the Council will face costly alternatives and a likely increase in out of borough placements.
- 3.9 Owing to the current economic pressures and the high probability of the UK entering a lengthy recession, during which homelessness through repossession is likely to rise considerably, further significant increases are being predicted for 2023/24. There will also be additional pressure on the Council to source accommodation for Ukrainian refugees if Hertfordshire County Council (HCC) are unable to rematch families with new hosts.
- 3.10 At present, Stevenage Borough Council has 186 operational units of interim/ temporary accommodation across the town (including 27 Housing First) consisting of a small number of specially adapted units and modular units, and a large number of shared and self-contained units that were formerly general needs properties.

Location	Type	units
Bedwell Crescent	Shared	3
Brent Court	Shared	3
Brick Kiln Road	Shared	8
Julians Road	Shared	8

Location	Type	units
Oaks Cross*	Shared	5
Oaks Cross (Modular/Pod)*	Self-Contained	11
Shephall View	Shared	7
The Muntings	Shared	5
Trumper Road	Shared	3
Valley Way	Shared	5
Walden End	Shared	2
Wellfield Court	Self-Contained	32
Wellfield House	Shared	6
York Road*	Shared	6
Dispersed houses/flats	Self-contained	82
<i>SUB TOTAL</i>		186
<i>Less 27 Housing First Units (*)</i>		159
Sub Total Shared Interim/Temp Accommodation Units		45
Sub Total Self-Contained Interim/Temp Accommodation Units		114
TOTAL INTERIM/TEMPORARY ACCOMMODATION UNITS		159

- 3.11 The ongoing housing and cost of living crisis in the UK means that there is a shortage of affordable homes and rising prices, putting additional pressures on public services. An outline of the Council's homelessness duties and legislation is contained in the Legal Implications section 5.2 of this report.
- 3.12 The graph below shows the impact the pandemic had on SBC bed and breakfast usage and, although the 'everyone in' directive ceased in May 2021, the Council took the stance to increase Housing First provision and avoid sending people back to rough sleeping; this approach saw some remaining in bed and breakfast accommodation whilst further provision was sourced to relieve this new-found demand. The graph reflects reduction in usage for the periods where restrictions were eased and again at times where new stock was introduced (as referenced in paragraph 3.4). The Temporary Accommodation Team have successfully managed the introduction of new homelessness accommodation provision and in turn reduced bed and breakfast usage significantly. A small demand for bed and breakfast usage remains in cases where needs cannot be met in the Council's own provision, however the introduction of Archways House should mitigate the need for any future block bookings post January 2023.



3.13 The Council is having to be proactive in sourcing appropriate homelessness accommodation. This challenge becomes greater as demand increases over winter months and emergency local hotel provision is diminished due to block bookings of hotel bed spaces, in the Borough, made by the Home Office this winter.

3.14 Officers are working closely with neighbouring districts, other housing providers and housing support providers such as One YMCA, who now manage the Haven, to look at future solutions.

4 REASONS FOR RECOMMENDED COURSE OF ACTION AND OTHER OPTIONS

4.1 The Temporary Accommodation Procurement and Placement Policy was last reviewed in March 2016; since then, there have been significant changes to legislation, namely the introduction of the Homeless Reduction Act 2017 (HRA17), along with changes to terminology and frameworks, requiring some minor amendments to reflect these changes.

4.2 The HRA17 introduced a 56-day relief duty period in which local authorities cannot conclude that an applicant is intentionally homeless. It further increased the number of stages at which a review can be requested and added a significant administrative burden; all of which has increased the time applicants

spend in interim accommodation, requiring local authorities to procure more provision to continue to meet demand of new applicants.

- 4.3 The previous policy referenced MHCLG guidance which has subsequently been replaced with guidance from DLUHC; the new policy reflects the updates.
- 4.4 Previously provision was separated into emergency and temporary housing with emergency being first stage and temporary being second stage (post acceptance of a homeless duty). Legislation now references interim accommodation to meet relief duty and temporary accommodation post main duty acceptance until the main duty is discharged.
- 4.5 The continued use of owned stock to support the delivery of the Council's statutory homeless function where possible, reduces the financial implications and further mitigates the risk of legal challenge.
- 4.6 The Council's responsibilities for homelessness accommodation present a cost to the Council's General Fund. Efforts have been undertaken to ensure an approach to charging and recharging costs is streamlined and consistent. There is further work to do on utility recharges given the different types of homelessness accommodation used. It is recommended that, given the increase in utility costs over the coming period, modelling is progressed in line with other housing provision. This is further explored under the financial implications.
- 4.7 The policy approach to predominantly using council owned housing stock to provide temporary accommodation and to only use hotels or nightly let provision where necessary is unchanged. The intentions of the policy and operational delivery remain the same; the report is coming before the Executive to approve the minor amendments.
- 4.8 Should the over-provision of Temporary Accommodation arise as a result of overestimated demand, self-contained units can be returned to General Needs accommodation.

5.1 FINANCIAL IMPLICATIONS

- 5.1.1 The homelessness functions undertaken by the Council are defined as General Fund services. However, in order to maintain a flexible response to housing need, all dwelling properties are managed and maintained within the Council's Housing Revenue Account. This allows the Council to reassign properties between licenses and tenancies and has helped reduce reliance on bed and breakfast accommodation. The HRA only has the expenditure and income from the running costs, rent and service charges related to the property. It does not incur any of the wider costs of the homelessness service such as the additional support services for this client group or equipping of the accommodation; further it does not contain the cost of bed and breakfast accommodation.
- 5.1.2 The Council has been unable to claim back £255K (to 1 December 2022) of housing benefit granted to those in of Bed and Breakfast accommodation because those rents are higher than allowed under legislation which doesn't apply to the council's own stock. The Council has also increased the 2022/23

budget for homelessness by a further £350K to meet the increased homeless need being experienced at the beginning of the year.

- 5.1.3 The Temporary Accommodation Team are working with the Hertfordshire Growth Board, using the Predictive Temporary Accommodation Model they have developed, to achieve accurate projections for temporary accommodation use over for the next financial year. The model has been designed for authorities in Hertfordshire to take a consistent approach when forecasting demand for 2023/24 allowing for percentage increases in homeless approach reasons
- 5.1.4 As part of the annual budgeting process the homeless accommodation charges have been reviewed and streamlined to support consistency across all homelessness provision; providing better alignment between actual costs, recovery and spend type. Appropriate weight has been given to ensure that the charges are realistic yet fair, with key focus on reducing the gap between spend and recovery and making operational management more efficient.
- 5.1.5 There is an element that the tenant must pay personally that is not covered by housing benefit. This mainly relates to utility costs and these are expected to increase substantially during the year. A further review of the utility charge modelling is recommended to maximise income recovery.
- 5.1.6 The Herts County Council contract of £83,442 to support adults with complex needs in temporary accommodation will be extended for a further 12 months from 1 April 2023. An additional £25K will also be allocated by Herts County Council to meet the demand and unmet support needs of households in homeless temporary accommodation managed by Stevenage Borough Council. This arrangement is in place whilst the County and Borough councils work collaboratively on developing a prospectus which will inform future commissioning plans for 2024/25.
- 5.1.7 The Department for Levelling Up Housing and Communities has allocated Stevenage Borough Council the Homeless Prevention Grant as follows:
- 2022/23 £512,409
 - 2023/24 £518,126
 - 2024/25 £525,891
- 5.1.8 This grant has and will continue to be used to fund adequate staffing to support homeless prevention work and to further fund homeless prevention support options for example, clearing arrears to prevent homelessness/sustain tenure, exploration of an effective triage service and earlier intervention work to prevent families going into Temporary Accommodation.

5.2 LEGAL IMPLICATIONS

- 5.2.1 Where the Council has reason to believe that an applicant may be homeless, or threatened with homelessness, it has a duty to make such inquiries as are necessary in order to satisfy itself:

- whether the applicant is eligible for assistance (this will depend on their immigration status); and
- if so, whether the Council owes any duty (and if so, what duty) to the applicant under the Housing Act 1996 (“HA 1996”)

5.2.2 Under Section 189A of the HA 1996 where the Council is satisfied that an applicant is both homeless (or threatened with homelessness) and eligible for assistance, it has a duty to carry out an assessment of their circumstances and then try to agree with them what steps they need to take to ensure they have and can retain suitable accommodation and what steps the Council needs to take under the HA 1996.

5.2.3 If an applicant is deemed to be homeless, eligible and in priority need then an “interim duty” is owed to accommodate the applicant under s188 HA 1996.

5.2.4 Further the Council owes the “full housing duty” under S193 HA 1996 to applicants who are in priority need and not intentionally homeless.

5.3 RISK IMPLICATIONS

5.3.1 Failure to source sufficient suitable in-house accommodation would result in significant cost implications from using hotel accommodation and an increased likelihood of this being out of area with additional transportation costs.

5.4 POLICY IMPLICATIONS

5.4.1 The Temporary Accommodation Procurement and Placement Policy responds to the Council’s Homelessness and Rough Sleeping Strategy 2019-24.

5.5 CLIMATE CHANGE IMPLICATIONS

5.5.1 As part of the Council’s commitment to tackling climate change new housing provision is considered with regards to the environmental impact of that development. Schemes such as the Dunn Close Hostel include air source heat pumps and enhanced insulation to reduce the running cost for the scheme, therefore having a positive impact both in terms of cost, but also in terms of energy efficiency. This will be an ongoing consideration as new sites are acquired and developed.

5.6 STAFFING AND ACCOMMODATION IMPLICATIONS

5.6.1 The staffing resource for Temporary Accommodation is currently funded from several funding streams:

Post	Funding stream	Funding ends
1 Temporary Accommodation Manager	Establishment	N/A

1 Senior Temporary Accommodation Officer	Establishment	N/A
6 Temporary Accommodation Officers	3 Establishment 3 linked to Homeless Prevention Grant	N/A Financial Year 2022/23, although should be secured through HPG confirmed for 2023/24
3 Temporary Accommodation Support Officers	1 Establishment 2 HCC Housing Related Support Funding	N/A Financial Year 2023/24
2 Temporary Accommodation Assistants	Establishment	N/A

5.6.2 A review of resources and the viable provision will need to be reviewed as funding streams end and other applications for funding are made.

5.7 EQUALITY AND DIVERSITY IMPLICATIONS

- 5.7.1 Rigorous consideration will ensure that proper appreciation of any potential impact of that decision on the Council's statutory obligations under the Public Sector Equality Duty. As a minimum this requires decision makers to read and carefully consider the content of any Equalities Impact Assessment (EqIA) produced by officers.
- 5.7.2 The Equality Act 2010 requires the Council when exercising its functions to have due regard to the need to (a) eliminate discrimination, harassment, victimisation and other conduct prohibited under the Act; (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it and (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it. The protected characteristics under the Equality Act 2010 are age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief, sex and sexual orientation.
- 5.7.3 Officers consider that, given the specific needs of those who are, or are at risk of, street homelessness, the Temporary Accommodation Procurement and Placement Policy is likely to have a positive impact on protected characteristics including gender, disability (including mental health), sexual orientation, and race. It also recognises the positive impact on socio-economic inequalities.
- 5.7.4 A full equality impact assessment has been completed and is available as a Background Document. The assessment shows that the policy has an overall positive impact as the scheme increases the ability for people with limited housing options in Stevenage to live independently in high quality and safe accommodation. This enhances their opportunities in society and helps to enable them to live comfortably without fear of abuse or discrimination.

5.8 SERVICE DELIVERY IMPLICATIONS

- 5.8.1 This policy supports the Temporary Accommodation Service to deliver the Council's statutory homelessness function.

6 BACKGROUND DOCUMENTS

All documents that have been used in compiling this report, that may be available to the public, they do not contain exempt information, should be listed here:

[Homelessness & Rough Sleepers Strategy 2019-2024](#)

7 APPENDICES

Appendix A – Temporary Accommodation Procurement and Placement Policy – January 2023