

NOTICE OF MEETING

CABINET MEMBER SIGNING

Thursday, 9th May, 2024, 11.30 am - George Meehan House, 294 High Road, N22 8JZ (watch the live meeting [here](#))

Councillors: Councillor Sarah Williams

1. FILMING AT MEETINGS

Please note that this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. Members of the public participating in the meeting (e.g. making depositions, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the meeting room and using the public seating area, you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual or may lead to the breach of a legal obligation by the Council.

2. APOLOGIES FOR ABSENCE

To receive any apologies for absence.

3. DECLARATIONS OF INTEREST

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

- (i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and
- (ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a

pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

4. DEPUTATIONS / PETITIONS / QUESTIONS

To consider any requests received in accordance with Part 4, Section B, paragraph 29 of the Council's constitution.

5. OMBUDSMAN DECISION (PAGES 1 - 28)

6. CONTINUED USE OF HOTEL ACCOMMODATION TO MEET HOMELESSNESS NEED (PAGES 29 - 52)

7. EXCLUSION OF THE PRESS AND PUBLIC

Item 7 and 8 were likely to be subject to a motion to exclude the press and public from the meeting as they contained exempt information as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

8. EXEMPT - CONTINUED USE OF HOTEL ACCOMMODATION TO MEET HOMELESSNESS NEED (PAGES 53 - 56)

Nazyer Choudhury, Principal Committee Co-Ordinator
Tel – 020 8489 2919
Fax – 020 8881 5218
Email: felicity.foley@haringey.gov.uk

Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Tuesday, 30 April 2024

Report for: Cabinet Member Signing

Item number: 5

Title: Ombudsman decision

Report authorised by: Beverley Tarka

Lead Officer: Denise Gandy

Ward(s) affected: All

**Report for Key/
Non-Key Decision:** Non-Key

1 Introduction.

- 1.1 This report updates the Cabinet Member for Housing Services, Private Renters and Planning on a recent Local Government and Social Care Ombudsman decision and the outcome of a review into how the Council takes account of its Equality Act 2010 duties when considering the suitability of temporary accommodation for homeless families.
- 1.2 The report also recommends steps which can be taken to ensure Equality Act duties are properly considered in future.

2 Cabinet Member Introduction.

- 2.1 This Ombudsman case further highlights the challenges faced by Haringey and other boroughs in response to the homelessness crisis in London. As a borough, we are working hard to mitigate these impacts - but more fundamental change is needed. Despite being one of the best performing councils for homelessness prevention, the Council continues to experience a high level of homelessness demand. We are seeing an increase in demand in three main areas: evictions from the private rented sector, approaches from refugee households and approaches from people fleeing domestic abuse. Furthermore, the number of landlords quitting London's temporary accommodation sector has risen by 140%, making hotel accommodation the only remaining option.
- 2.2 The reduction in availability of affordable private sector lets has affected the ability to move families who are facing homelessness to alternative settled accommodation rather than into temporary accommodation. Boroughs are attempting to find accommodation in a market that is broken and can no longer meet the housing needs of those who need accommodation most.

3 Recommendations.

It is recommended that the Cabinet Member

3.1 Notes: -

- (a) the Ombudsman's decision letter (appendix A)
- (b) the summary of the current TA Placement Policy and its EQIA (paras 6.5 - 6.9)
- (c) the review of how the policy was used in practice (paras 6.10-6.19).

3.2 Approves the amendment of the Temporary Accommodation Placement Policy to include the Priority for Accommodation Type as set out in Appendix C.

4 Reasons for decision.

- 4.1 The current Temporary Accommodation Placement Policy does not include guidance on the use of hotels and bed and breakfasts.
- 4.2 Although the Council has a requirement to follow the Homelessness Code of Guidance and the Homelessness (Suitability of Accommodation) (England) Order 2003, adding the proposed additional text to the TA Placement Policy as recommended at 3.2 will confirm the Council's commitment to keeping to this Guidance.

5 Alternative options considered.

The Council could continue with its current practice/policy.

- 5.1 This option was rejected as this does not reassure the public that the Council is committed to the application of the Homelessness Code of Guidance and the Suitability of Accommodation Order

6 Background information.

The Ombudsman Decision

- 6.1 The Ombudsman's investigation was of a complaint from Mr B who had been placed in a series of bed and breakfasts.
- 6.2 The specifics of the complaint were that:
- The Council did not support Mr B appropriately when he was being evicted from Temporary Accommodation (TA) provided by the Council which had been ended as the owner wanted to sell their property.
 - Between April 2023 and August 2023 Mr B's family were placed in unsuitable hotel accommodation with no cooking facilities and that the family had to move between different hotels frequently.
 - The limited room, lack of cooking facilities and need to move frequently caused significant instability to the family causing the children to miss school and led to distress to the family, particularly to Mr B's disabled children.

6.3 The Ombudsman found that:

- Mr B's family were placed in B&B accommodation for 18 weeks between early April and early August 2023 and that the use of B&B accommodation for the family represents a service failure by the Council.
- Mr B's family includes two Autistic children and the unsuitability of this type of accommodation and the instability caused by the need to move regularly between different locations is likely to have placed them at a particular disadvantage.
- Though the Council faced difficulties in finding new temporary accommodation in the area, the Council did not indicate that it had considered how this disadvantage could be mitigated.
- The Council's Temporary Accommodation Placement Policy states that some priority will be given for in-borough accommodation where an applicant's children have special educational needs and attend a school in the borough.
- The Council did not provide evidence that any additional priority was afforded to the family for in-borough accommodation despite one of the children's Education, Health and Care (EHC) Plan naming a school in the borough.

6.4 The Ombudsman decision was that the Council did not have sufficient regard to its duty under the Equality Act to prevent indirect discrimination to two of Mr B's children. This was found to be fault.

6.5 Changes in the private sector market has resulted in fewer properties available which can be used to house homeless families, and the use of hotel accommodation as a last resort. Albeit under challenging circumstances, we accept that we did not discharge our duties in relation to the Equalities Act and have apologised for this.

The Temporary Accommodation Placement Policy

6.6 The current Temporary Accommodation Placement Policy was approved by Cabinet on 18 October 2016.

6.7 During the Policy's development, an Equalities Impact Assessment was prepared which undertook assessments of how the new policy might affect each individual household in temporary accommodation. The policy was also designed to ensure that priority for in-borough accommodation was given to exceptional cases.

6.8 The main aim of the policy was to set down priorities for in-borough

accommodation and accommodation in neighbouring boroughs.

- 6.9 The full policy is presented at Appendix B but a summary of the priorities for in-borough accommodation includes where a member of the household had one of the following (and where there was a specialist service or support which cannot be easily transferred)
- a severe and enduring health condition
 - a significant package and range of health care options
 - a severe and enduring mental health problem
 - a child registered on the Child Protection Register
 - a child with special educational needs
 - someone providing long term and significant care and support.
- 6.10 The policy also gives priority for any other special circumstance that would be taken into account including any particular needs of the children in the household not already identified.
- 6.11 The combination of these criteria would, if the Council had had alternative accommodation available to allocate, have meant the complainant would have been placed in-borough.
- 6.12 However, the main part of the complaint is around the changing location and placement in bed and breakfast accommodation. While the current policy (if applied as written) would partly address the changing location issue by giving them priority to at least remain in-borough, the policy does not set out the type of temporary accommodation a household might be placed in.
- 6.13 At that time the Council rarely placed people in Bed and Breakfast accommodation except in rare emergency placements and the suitability of different types of accommodation was set out in the 2018 Homelessness Code of Guidance and other legislation/guidance which the Council was legally required to use.
- 6.14 However, with a reduction in the supply of self-contained accommodation, longer term placements into Bed and Breakfasts have become common place across London. To avoid any doubt, it is therefore recommended that this guidance is added to the current TA Placement Policy and a commitment confirming that the Council will follow this when deciding on the use of Bed and Breakfast accommodation. This includes an update to the Guidance on 28th February 2024, which make it explicit that temporary accommodation should not be considered suitable for a family with children under 2 if there is not enough space for a cot. It also states that housing authorities should support families to secure a cot where needed. These changes are set out in Appendix C.

Review of Equality Act considerations

- 6.15 The Council has recognised for a long time that the use of hotel accommodation to meet its statutory duties is something that needed

addressing as a priority. The impact on the households placed, including those with protected characteristics such as disability in this case, is significant and the position presents significant financial and reputational risks to the Council.

- 6.16 The Council is therefore, committed to moving away from a reliance on hotels as soon as possible and the plans to do this are contained in the Council's B&B Elimination Plan.
- 6.17 Mr B explained that his Autistic children struggled with the need to move regularly. Mr B and his family were placed in Travelodge hotels in Brent Cross, Cricklewood, Hackney and Manor House between 6 April to 28 June 2023, at which point they were transferred into Cranbrook Hotel, which was one of the block-booked hotels procured by the Council.
- 6.18 In recent months, the Council has been developing a Hotelier Framework to allow the Council to transition away from the use of high-cost commercial hotels and towards a block-booked approach with suppliers who specialise in the provision of hotels to meet homelessness need. For example, these hotels may have cooking facilities, additional security and cleaning that are unavailable in other hotels.
- 6.19 A benefit of moving away from the Commercial hotel approach is that families can have more stability by avoiding the need to relocate to different hotels across London. This approach involves reserving blocked booked rooms in hotels that are as close to the borough as possible, at a fixed rate that has been agreed upon for the duration of the term.
- 6.20 This also helps to reduce costs and competition from other councils. It is important to note that all of the rooms are exclusively reserved for Haringey residents and cannot be used by other Councils.

7 Carbon and Climate Change

- 7.1 Not applicable.

8 Statutory Officers comments

Finance

- 8.1 Finance notes the content and recommendations of this report, and the implications of the use of B&B accommodation as temporary accommodation. There are plans to minimise the use of this type of accommodation. Finance will continue to work with the housing demand service to assess the impact of this and the proposed changes on the relevant budgets.

Strategic Procurement

- 8.2 Strategic Procurement notes the content and recommendation of the report, and that no procurement decision is required by the report recommendation in section 3.

Assistant Director of Legal & Governance

- 8.3 The Assistant Director of Legal and Governance has been consulted in the drafting of this report.
- 8.4 The Council is required to give public notice by advertisements in newspapers stating that copies of the Ombudsman's report will be available to inspect by the public at the Council's offices for a period of three weeks (s.30 Local Government Act 1974).
- 8.5 Where a report such as this is made by the Ombudsman, it must be laid before the authority (s.31 Local Government Act 1974). In cases such as this where the Council is operating executive arrangements, "the authority" means the executive, i.e. Cabinet (s.25(4ZA) Local Government Act 1974).
- 8.6 The monitoring officer is obliged to consult with the head of paid service and chief finance officer, and prepare a report to Cabinet. This report must be sent to each member of the authority and Cabinet must meet within 21 days thereafter. Implementation of the proposal or decision must be suspended until after the report has been considered by Cabinet (s.5A Local Government and Housing Act 1989).
- 8.7 Where Cabinet considers an Ombudsman's report and it is considered that a payment should be made or other benefit given to a person who has suffered injustice, such expenditure may be incurred as appears appropriate (s.31(3) Local Government Act 1974).
- 8.8 The Ombudsman must be informed of the action taken by the Council and any action it is proposed to take within 3 months of the date on which the Council received the report, or such longer period as may be agreed by the Ombudsman in writing (s.31(2) Local Government Act 1974).
- 8.9 If the Ombudsman does not receive notification of such action or is not satisfied with it, he will make a further report explaining this and making recommendations. He can also require the Council to make a public statement in any two editions of a newspaper circulating the area within a fortnight (s.31(2A) and (2D) Local Government Act 1974).
- 8.10 An Ombudsman's report should not normally name or identify any person (s.30 Local Government Act 1974). Therefore, the complainant is referred to as "Mr B" and officers have not been identified.
- 8.11 Other legal implications are set out in the body of the report.
- 8.12 There is no legal reason why the Cabinet Member should not adopt the recommendations in this report.

Equality

- 8.13 The council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
 - Advance equality of opportunity between people who share protected characteristics and people who do not
 - Foster good relations between people who share those characteristics and people who do not
- 8.14 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 8.15 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.
- 8.16 This report covers an Ombudsman decision regarding a complaint from a Haringey council tenant living in temporary accommodation. The Local Government and Social Care Ombudsman found that the Council did not provide appropriate alternative accommodation or support for Mr B and his family, which includes two Autistic children, when they were evicted from temporary accommodation.
- 8.17 Between April 2023 and August 2023 Mr B's family, which includes two autistic children were placed in unsuitable hotel accommodation with no cooking facilities and that the family had to move between different hotels frequently. In doing this the Ombudsman has found that Haringey Council did not have sufficient regard to its duty under the Equality Act to prevent indirect discrimination to Y and Z. Where the Council should have considered the disproportionate impact so many moves would have on the two children with autism.
- 8.18 As set out in 6.14, the Council recognises that the use of hotel accommodation to meet its statutory duties is something that needs to be addressed as a priority and that it negatively impacts on households particularly those with protected characteristics.

- 8.19 The Council has introduced two mitigations as part of a broader response to these challenges, which aim to address the negative implications of this decision.
- 8.20 Firstly, the Council's B&B Elimination Plan outlines a series of steps to move away from a reliance on the use of hotels. Secondly, a new Hotelier Framework will allow the Council to transition away from the use of high-cost commercial hotels and towards a block-booked approach with suppliers who specialise in the provision of hotels to meet homelessness need.
- 8.21 Finally, recommendation D "The amendment of the Temporary Accommodation Placement Policy to include the Priority for Accommodation Type as set out in Appendix C" should help make it clearer when it is appropriate to use B&B accommodation and help to prevent these circumstances from repeating.
- 8.22 The above plans and changes should have a positive impact on the Council's ability to meet its duty under the Equality Act 2010 with regards to temporary accommodation placements.

9 Use of Appendices

Appendix A – The Ombudsman's final decision

Appendix B - The Temporary Accommodation Placement Policy

Appendix C - Additional Text to be added to the TA Placement Policy

10 Background papers

- B&B Elimination Plan
http://minutes.harinet.haringey.gov.uk/documents/s142041/Checklist%20for%20Ending%20BB%206wks%20Sept%202023_.pdf
- 3 April 2018 Homelessness Code of Guidance Section 17*
<https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities/chapter-17-suitability-of-accommodation>

** This is an external link. Haringey Council is not responsible for the contents or reliability of linked web sites and does not necessarily endorse any views expressed within them. Listing should not be taken as endorsement of any kind. It is your responsibility to check the terms and conditions of any other web sites you may visit. Haringey Council cannot guarantee that these links will work all of the time and has no control over the availability of the linked pages.'*

2 January 2024

Complaint reference:
23 004 816

Complaint against:
London Borough of Haringey

The Ombudsman's final decision

Summary: Mr B complained the Council did not properly support his family and his Autistic children when they were evicted. He also complained they were placed in bed and breakfast accommodation and they had to move between hotels frequently. We found there was fault by the Council and the provision of bed and breakfast accommodation for his family represented service failure. We recommend an apology, a payment and a review of the Council's processes regarding temporary accommodation provision.

The complaint

1. Mr B complains the Council did not support him appropriately when he was being evicted from Temporary Accommodation (TA) provided by the Council.
2. He complains that between April 2023 and August 2023 his family were placed in unsuitable hotel accommodation with no cooking facilities. The family had to move between different hotels frequently.
3. Mr B told us that he has three children, two of which are Autistic and non-verbal. The limited room, lack of cooking facilities and need to move frequently caused significant instability to the family, caused his children to miss school and led to distress to his family, particularly to his disabled children.

The Ombudsman's role and powers

4. We investigate complaints of injustice caused by 'maladministration' and 'service failure'. I have used the word fault to refer to these. Service failure can happen when an organisation fails to provide a service as it should have done because of circumstances outside its control. We do not need to show any blame, intent, flawed policy or process, or bad faith by an organisation to say service failure (fault) has occurred. (Local Government Act 1974, sections 26(1), as amended)
5. If we are satisfied with an organisation's actions or proposed actions, we can complete our investigation and issue a decision statement. (Local Government Act 1974, section 30(1B) and 34H(i), as amended)
6. The Equality Act 2010 provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. It offers protection, in employment, education, the provision of goods and services, housing, transport and the carrying out of public functions.

7. The Equality Act makes it unlawful for organisations carrying out public functions to discriminate on any of the nine protected characteristics listed in the Equality Act 2010. They must also have regard to the general duties aimed at eliminating discrimination under the Public Sector Equality Duty.
8. Discrimination may be direct or indirect. Direct discrimination may occur when a person is treated less favourably because of a protected characteristic. Indirect discrimination may occur when an organisation applies an apparently neutral provision, criterion or practice which puts persons sharing a protected characteristic at a particular disadvantage.
9. The '[protected characteristics](#)' referred to in the Act are:
 - a) age,
 - b) disability,
 - c) gender reassignment,
 - d) marriage and civil partnership,
 - e) pregnancy and maternity,
 - f) race,
 - g) religion or belief,
 - h) sex, and
 - i) sexual orientation.

How I considered this complaint

10. I spoke to Mr B and considered the information he provided. I asked the Council for information and I considered its response to the complaint.
11. Mr B and the Council had an opportunity to comment on my draft decision. I considered any comments received before making a final decision.

What I found

Legislation and Policy

The main housing duty

12. If a council is satisfied an applicant is homeless, eligible for assistance, and has a priority need a council has a duty to ensure accommodation is available for their occupation.

Housing Act and Homelessness Code of Guidance

13. The law says councils must ensure all accommodation provided to homeless applicants is suitable for the needs of the applicant and members of their household. This duty applies to interim accommodation and accommodation provided under the main housing duty. (Housing Act 1996, section 206 and Homelessness Code of Guidance 17.2)
14. Bed and breakfast (B&B) accommodation can only be used for households which include a pregnant woman or dependent children when no other accommodation is available and then for no more than six weeks. B&B is accommodation which is not self-contained, not owned by the council or a registered provider of social housing and where the toilet, washing, or cooking facilities are shared with other

households. (Homelessness (Suitability of Accommodation) (England) Order 2003 and from 3 April 2018 Homelessness Code of Guidance paragraph 17.32)

The Council's Temporary Accommodation (TA) Policy

15. The policy notes the Council's legal obligations for providing suitable Temporary Accommodation (TA) and the factors it should take into account when deciding if accommodation is suitable.
16. Amongst other things the Council's policy states it would not accept a child's attendance at a specific school in its borough to be grounds for an applicant to refuse an offer of TA. However, it states some priority would be given to finding accommodation within the borough for pupils who have special educational needs or those close to taking examinations.
17. The policy also lists a criteria for prioritising moves between TA placements. The highest priority for a move will be afforded where an applicant's existing TA is in serious disrepair which poses threat to life. The next highest priority is given to a need to move because of an evidenced, critical medical need. Third in the priority list is families that have been placed in non-council shared accommodation for at least 5 weeks. (This is to avoid penalties for families sharing facilities beyond 6 weeks).

Purpose of this decision statement

18. The purpose of this decision statement is to explain our decision on the complaint. It will set out some of the key events that occurred in order to do so. However, it is not intended to be a comprehensive chronology of everything that has happened.

Background

19. Mr B presented as homeless to Haringey Council (The Council) some time before the events of this complaint. The Council placed Mr B, his wife and three children in Temporary Accommodation in a neighbouring borough, Enfield, in 2016. The TA they occupied was a two-bedroom flat in a converted house.
20. Mr B's oldest son (X) was in Year 7 during the events of the complaint. Mr B's youngest son is Autistic and non-verbal. I have referred to him as Y in this statement. Y has an Education, Health and Care (EHC) Plan. Y's EHC plan as at 2022 named a school in the borough of Haringey. Mr B's daughter (Z) is also Autistic and non-verbal.

Mr B's complaint

21. We have considered the events of Mr B's complaint from the start of 2022.
22. In early 2022 Mr B told the Council that the landlord of his TA flat was planning to evict his family. Mr B says the landlord suggested there were rent arrears. However, this was not the case as he had paid his rent to the Council.
23. The Council told us there was no indication that the landlord considered there were rent arrears, but it was aware in March 2022 that the landlord wanted to regain possession of the TA flat in order to sell the property.
24. In June 2022 the Council contacted Mr B and carried out a re-housing assessment. This noted that one of Mr B's sons was Autistic and had an EHC Plan which named a school in the borough of Haringey.
25. The Council told us a rehousing officer met Mr B and kept in contact with him but the relevant team did not provide a wraparound general housing support service.

26. On 22 November 2022 the Council received a Court Order granting possession of the property to the Landlord of Mr B's TA. It required Mr B and his family to leave the property on or by 15 December 2022.
27. On 16 January 2023 the Courts granted Mr B's Landlord an Eviction Order. It stated Mr B and his family would be evicted on 6 April 2023. There is evidence that on 3 April, shortly before the eviction date, a re-housing officer sent the Eviction Notice to the team responsible for temporary accommodation. It stated Mr B had been told to expect alternative accommodation or a hotel booking. The officer asked the team to bear in mind that Mr B had a child with special education needs. The officer told the team the address of the school Y attended within the borough.
28. Mr B and his family were placed in a hotel outside the borough. In the four months between 6 April 2023 and 28 June 2023, Mr B and his family were placed in 5 different branches of the same hotel chain. They moved between these different hotels 7 times during this period. On average, they moved to a new location every two weeks.
29. Between the end of June and early August, the Council moved Mr B's family to a different hotel which the Council had block booked and contracted to provide TA. Although this remained B&B accommodation, this meant the family were able to remain there, without further moves. The hotels the Council placed Mr B and his family in spanned four different London boroughs.
30. In May 2023 the Council had identified private sector accommodation that would be available for Mr B's family to move into once void works were done. (Void works are repairs and other work needed before a property is ready for occupation). Unfortunately, the void works took longer than expected.
31. Mr B and his family were able to move into suitable private sector accommodation on 9 August 2023. This ended the Council's homelessness duty.

The impact of B&B Accommodation

32. The regular moves between different hotels in different London boroughs meant different journey times and complexities for X to try to maintain his school attendance. The journey to school, via public transport, was around 1 hour 30 mins, on average, from the various hotels the family were placed in. Mr B stated he tried the journey with X, but X has travel sickness so the journey was not possible. As a result, X missed school while the family were in hotel accommodation.
33. Mr B told us that the hotels did not have cooking facilities which made it difficult to provide the family with home cooked food. As a result, the children ate a poor diet, became distressed and lost weight.
34. Mr B explained that his Autistic children struggled with the need to move regularly as well as the changes to their diet. This upset them and led to meltdowns. Prior to living in hotels, his two autistic children could not share a room because Y could not tolerate Z's behaviour. Because they had very limited space the proximity of the children caused particular distress to Y. It was upsetting for Mr B, his wife and his eldest son to deal with the distress caused to Y and Z. Mr B said this was explained to the Council and he provided letters from his GP about the impact, but the family remained in hotel accommodation.

What the Council told us

35. The Council told us that it was aware of Mr B's family's circumstances and needs, but it was unable to secure accommodation that was any more suitable. It stated,

if the Council was in a position to provide accommodation that was better suited, it would have done so.

36. A report to the Council's Cabinet in October 2023 stated there was a homelessness crisis in London, which the Council was working hard to mitigate. It noted that for the first time in a decade, the Council had to resort to using hotel accommodation as TA for households facing homelessness. As at September 2023, the Council had 103 households placed in hotels. It recognised the need to address this as a priority. The report explained there had been an increase in demand and a severe downturn in the supply of accommodation it could use as TA. The report included a detailed B&B elimination plan setting out wide ranging actions to address the issue.

Our Findings

Use of B&B Accommodation

37. The Council was unable to find Mr B's family alternative TA when the landlord of their TA flat sought to take back possession of it. This was because it had no available TA due to a significant shortage of available accommodation. For the same reasons, when Mr B's family were evicted, they were placed in B&B accommodation.
38. The Homelessness Code of Guidance states that, wherever possible, the use of B&B accommodation should be avoided for all homeless applicants. It states that living in B&B accommodation can be particularly detrimental to the health and development of children. The Homelessness (Suitability of Accommodation) (England) Order 2003 specifies that B&B accommodation is not suitable for families to occupy. It should only be used for families as a last resort and then, only for a maximum of six weeks.
39. Mr B's family were placed in B&B accommodation for 18 weeks between early April and early August 2023. The use of B&B accommodation for the family represents service failure by the Council.
40. I note that the Council has identified the issue and it is taking positive steps to end the reliance it currently has on B&B accommodation via an action plan.

Equality Act Considerations

41. The Homelessness Code of Guidance makes it clear that B&B accommodation is unsuitable for families in general. Mr B's family includes two Autistic children. The Council told us, despite being aware that Y and Z were Autistic, it was not in a position to provide other accommodation. I note the difficulties the Council has with the housing market in its area. However, because of Y and Z's Autism, the unsuitability of this type of accommodation and the instability caused by the need to move regularly between different locations, is likely to have placed them at a particular disadvantage. The Council did not indicate that it considered how this disadvantage could be mitigated. For example, by planning accommodation to ensure no, or less frequent moves for the family, or by taking additional steps to source hotel or other TA accommodation within its borough for the family which would better enable Y to attend the school named in his EHC plan.
42. The Council's policy for providing temporary accommodation states that some priority will be given to providing accommodation within the borough where an applicant's children have special educational needs and attend a school in the borough. Y's EHC plan named a school in the borough, but there is no evidence that any additional priority was afforded to the family to be accommodated in the borough.

43. Based on the information the Council provided, we found it did not have sufficient regard to its duty under the Equality Act to prevent indirect discrimination to Y and Z. This was fault.

Agreed action

44. Within four weeks of my final decision:
45. The Council should provide a written apology to Mr B and his family for the length of time they spent in unsuitable B&B accommodation and for the impact this had on the family. The apology should adhere to our guidance on making effective apologies. This can be found on our website, within our Guidance on Remedy [here](#).
46. To recognise the difficulties that the stay in B&B accommodation caused for the family, the Council should pay Mr B £3600.
47. To recognise the distress caused to the family, the Council should make a payment of £1000.
48. Within six weeks of my final decision:
49. The Council should review how it takes account of its Equality Act duties when considering the suitability of temporary accommodation for homeless families. It should present a report to the Council's Cabinet to show what has been considered as part of this review and what steps will be taken to ensure Equality Act duties are properly considered when making decisions about temporary accommodation in future.
50. The Council should provide us with evidence it has complied with the above actions.

Final decision

51. There was fault and service failure by the Council. I have completed my investigation on the basis the Council has agreed to our recommendations to remedy the complaint.

Investigator's decision on behalf of the Ombudsman

Appendix B



Temporary Accommodation Placements Policy

Approved by Cabinet on 18th October 2016

Temporary Accommodation Placements Policy

Contents

1. Introduction	2
2. Temporary Accommodation Offers and Refusals	3
3. Suitability of accommodation – factors to consider	4
4. Criteria for prioritising placements inside/outside the Borough	6
5. Minimum Size Criteria	8
6. Criteria for prioritising moves between temporary accommodation	9

Temporary Accommodation Placements Policy

1 Introduction

- 1.1 This document sets out our approach to the placement of households in temporary accommodation, both in and out of the borough, on the periphery of London and when required further afield. It covers both *interim* placements made under Section 188 Housing Act 1996 (“HA96”), while homelessness enquiries are undertaken, and longer-term temporary accommodation placements for households accepted as homeless under Section 193 HA96.
- 1.2 The Policy takes into account the statutory requirements on local authorities in respect of the suitability of accommodation, including the Suitability of Accommodation Orders, the Homelessness Code of Guidance 2006, and Supplementary Guidance issued in 2012. It has also been formulated having regard to the need to safeguard and promote the welfare of children, as required by section 11 of the Children Act 2004.
- 1.3 As per section 208 of the Housing Act 1996, and paragraph 16.7 of the Homelessness Code of Guidance, so far as reasonably practicable, the council seeks to accommodate homeless households in Haringey and always considers the suitability of the accommodation, taking into account the circumstances of the individual household. However, due to an acute shortage of affordable housing locally and rising rental costs, an increasing number of households are likely to be placed out of the borough as it will not be reasonably practicable to provide accommodation within Haringey.
- 1.4 When determining whether it is reasonably practicable to secure accommodation in Haringey, as opposed to simply what is reasonable, the cost of the accommodation is a relevant and proper consideration given the intensive pressures on housing stock in Haringey and a high demand for a range of suitable accommodation with a limited budget.
- 1.5 The Local Housing Allowance (LHA) is used to work out how much Housing Benefit a tenant will receive to pay their rent. LHA rates depend on who lives in the household, and the area they are making their claim in. These areas are called Broad Rental Market Areas (BRMA).
- 1.6 Haringey Council is divided into two Broad Rental Market Areas which are used to calculate LHA rates in Haringey. Inner North London BRMA and Outer North London BRMA.
- 1.7 Due to the lack of supply of affordable, suitable temporary accommodation across London, it may be necessary to procure some units outside London. Where possible, these units will be in the periphery of London, for example in Essex and Hertfordshire. However, at times of high demand and limited supply, it may be necessary to secure units further away from London. Such units will only be procured when all other reasonable options have been exhausted. Prior

to placing a household into such accommodation, an assessment will be undertaken to determine that the placement is affordable in cases where travel to employment is a factor.

- 1.8 This Policy details how applicants will be prioritised for temporary accommodation in Haringey, and out of the borough.

2 Temporary Accommodation Offers and Refusals

- 2.1 Homeless applicants who are housed under the council's interim duty to accommodate pursuant to Section 188 HA96 may initially be placed into accommodation with shared facilities. Where this is non-council owned accommodation, families will be moved to alternative accommodation within 6 weeks to comply with the legislation on B&B use. There is no restriction on the length of time a household can spend in council owned accommodation with shared facilities. It is also possible that families will be moved to nightly paid self-contained accommodation. This accommodation is increasingly likely to be out of the borough. If the council decides it has a duty to house the household, they may be moved to longer-term accommodation such as council owned hostel, Housing Association leased or other leased accommodation as soon as a suitable property becomes available.
- 2.2 Where the council decides that applicants housed under Section 188 HA96 are not owed the main homelessness duty, they will be asked to leave following reasonable notice, after being notified of the decision. The reasonable notice period would generally be 7-14 days for single applicants and 28 days for families (having regard to the need to safeguard and promote the welfare of any children in the family). The cessation of temporary accommodation will always be notified to Social Services in cases where there are dependent children.
- 2.3 Applicants will be given one offer of suitable interim or longer term temporary accommodation and they will be asked to accept it straight away. There is no obligation upon the council to enable applicants to view the accommodation prior to acceptance. In making the offer, the household's individual circumstances will be considered, taking into account the factors set out in section 3 of this Policy and the council's criteria on out of borough placements (section 4).
- 2.4 If an applicant refuses an offer, they will be asked to provide their reasons for refusal and to sign a pro-forma confirming that they understand the consequences of the refusal. Failure to agree to sign the refusal pro-forma will be noted. This applies to new applicants to whom the council has an interim duty to accommodate under Section 188 HA96, as well as those being transferred to alternative temporary accommodation. The council will consider the reasons given and undertake further enquires as necessary. If the council accepts the reasons for refusal as valid, the offer will be withdrawn and a further offer will be made.

- 2.5 Where applicants refuse suitable emergency accommodation (which may include out of borough placements) and the council does not accept their reasons for refusal, and considers that the offer is suitable, applicants will not be offered further accommodation and will be required to make their own arrangements. There is no right of internal review against the suitability of accommodation offered to applicants under Section 188 HA96 (although applicants can apply for judicial review through the courts). For applicants where the council has accepted a rehousing duty under Section 193 HA96, (s193 duty) there is a right to request an internal review of the suitability decision, pursuant to Section 202 HA96.
- 2.6 In cases where the applicant still refuses a suitable offer of accommodation, the homelessness duty will be discharged. If the applicant is resident in emergency accommodation, they will usually be asked to vacate the property and advised that no further assistance will be provided. If they are already in longer-term temporary accommodation not managed by the council, the relevant housing provider should be advised that the duty has been discharged so that they can start possession action.
- 2.7 Where applicants, towards whom the council has accepted a s193 duty, refuse a suitable offer and submit a review request, they will only continue to be accommodated during the review period in exceptional circumstances. Each case will be considered on an individual basis, taking into account the overall merits of the review request, any new information or evidence that may affect the original decision, and the personal circumstances of the applicant and the potential impact of the loss of accommodation.

3 Suitability of accommodation – factors to consider

- 3.1 In offering temporary accommodation, the council will consider the suitability of the offer, taking into account the following factors:
- 3.2 **Location** – if suitable, affordable accommodation is available in its area, applicants will be housed in Haringey, allowing them to maintain any established links with services and social/support networks. However, when there is a lack of suitable accommodation or there are higher priority households needing accommodation in the borough, out of borough placements will be used to meet the council's housing duty (see section 4 on priority for local accommodation below). If no suitable accommodation is available in the borough, attempts will be made to source accommodation within other parts of London. If this is not available, the provision of accommodation on the periphery of London or further afield may have to be considered.
- 3.3 **Size condition and facilities** – accommodation must provide adequate space and room standards for the household and be fit to inhabit. Households in temporary accommodation will often be placed into units with 1 bedroom less than they would be entitled to on a permanent basis, with the expectation that the living room provides dual purpose as a living and sleeping area. In deciding

on the fitness of the property, consideration should be given to the length of time needed to complete any necessary repairs and whether it is reasonable to complete these while the property is occupied. The quality of the decoration/furniture, the layout/type of accommodation, provision of parking and lack of access to a garden are extremely unlikely to be acceptable reasons for a refusal.

- 3.4 **Health factors** – the council will consider health factors, such as an ability to get up the stairs, care and support provided by other statutory agencies or the need to access any specialist medical services that are only available in Haringey. If the applicant or a member of the resident household is citing medical grounds that were not identified during the initial assessment, the applicant will be asked to submit medical information within 24 hours. The key test in determining the impact of medical issues is whether the condition itself makes the housing offered unsuitable. Problems such as depression, asthma, diabetes or back pain would not normally make a property unsuitable, as the problems would persist in any sort of accommodation.
- 3.5 **Education** - attendance at local schools will not be considered a reason to refuse accommodation, though some priority will be given to special educational needs and students who are close to taking public examinations in determining priority for placements in the borough (see Section 4).
- 3.6 **Employment** –the council will consider the need of applicants, who are in paid employment, to reach their normal workplace from the accommodation that is secured. This will include having a regard to both travelling time and the costs associated with this travel (see Section 4).
- 3.7 **Proximity to schools and Services** - The council will consider the proximity to schools, public transport, primary care services, and local services in the area in which the accommodation is located
- 3.8 **The need to safeguard and promote the welfare of any children in the household** – Insofar as not already identified, the council will seek to identify any particular needs of the children in the household. It will have regard to the need to safeguard and promote their welfare in making decisions on whether the offer is suitable (although it has to be borne in mind that almost all families seeking temporary accommodation are families with children).
- 3.9 **Any special circumstance** - The council will consider any other reasons put forward by the applicant and come to an overall view about whether the offer is suitable.

4 Criteria for prioritising placements inside/outside the Borough

4.1 As a number of applicants will be housed out of the borough, it will increasingly be necessary to make decisions about the suitability of out of borough placements for individual households and balance these against the type and location of temporary accommodation that can be offered. In many cases housing out of the borough will be more sustainable for the household in the long-term, with lower rents allowing them to better meet their subsistence and household costs and avoid rent arrears.

4.2 Priority for accommodation in the borough will be given to*:

- (a) Members of an applicant's household with a severe and enduring health condition requiring intensive and specialist medical treatment where a move from Haringey would disrupt that treatment and continuity of care.
- (b) Members of an applicant's household who are in receipt of a significant package and range of health care options that cannot be easily transferred.
- (c) Members of an applicant's household with a severe and enduring mental health problem who are receiving psychiatric treatment and aftercare provided by community mental health services and have an established support network where a transfer of care would severely impact on their well being.
- (d) Households with children registered on the Child Protection Register in Haringey who are linked into local services and where it is confirmed that a transfer to another area would adversely impact on their welfare.
- (e) Households containing a child with special educational needs who is receiving education or educational support in Haringey, where change would be detrimental to their well-being.
- (f) An applicant or a member of their household who have a longstanding arrangement to provide care and support to another family member in Haringey who is not part of the resident household and would be likely to require statutory health and social support if the care ceased.
- (g) An applicant or a member of their household who have a formal arrangement to receive housing related or other support, including addiction help or recovery, and where a move from Haringey would disrupt that support.
- (h) Any other special circumstance will also be taken into account (including any particular needs of the children in the household not already identified).

**Whilst priority will be given for these placements, this is dependent on such accommodation being available.*

4.3 Priority for placements within neighbouring boroughs will be given to:

- (a) Applicants who have as part of their household, a child or children who are enrolled in GCSE, AS or A level courses or post 16 vocational qualifications (for example, BTEC) in Haringey, with exams to be taken within the academic year. Wherever practicable we will seek to place such households within 60 minutes' travelling distance of their school or college.
- (b) Wherever practicable, an applicant or a member of their household who works for more than 16 hours per week will not be placed more than one hour travelling distance by public transport, from their place of employment. Consideration will also be given to the affordability of the travel arrangements needed to reach the place of employment. This will include women who are on maternity leave from employment.
- (c) An applicant or a member of their household who is in higher or adult education, vocational or professional training, a recognised apprenticeship, self-employed with a business predominantly in Haringey, have a confirmed start date to commence employment in Haringey or are enrolled in a Haringey work readiness programme.
- (d) Any other special circumstance will be taken into account (including any particular needs of the children in the household not already identified).

4.4 Applicants who meet none of the above criteria are likely to be offered properties outside of Haringey and the neighbouring boroughs, in other parts of London or outside London.

4.5 If placed outside London the council may offer assistance and support for a reasonable period, on a case by case basis. Support may include help with:

- Finding employment
- Identifying and arranging schools
- Child care
- Health e.g. signing up with a local GP
- Council links e.g. Council Tax, electoral register
- Welfare benefits
- Utility connections (i.e. electricity/gas/phone/internet)
- Removals and assistance with identifying appropriate storage
- Identifying links to local support e.g. contact with community, voluntary, faith and other groups
- Financial assistance with immediate resettlement costs

The package will be kept under review and amended as required to ensure the provision of appropriate support.

5 Minimum Size Criteria

- 5.1 Accommodation must provide adequate space and room standards for the household and be fit to inhabit. Households in temporary accommodation will often be placed into units with 1 bedroom less than they would be entitled to on a permanent basis, with the expectation that the living room provides dual purpose as a living and sleeping area. The following minimum size criteria will apply:
- 5.2 Studio accommodation:
- Single applicants
 - Couples
 - Lone parents with a child under the age of 12 months.
- 5.3 One bedroom accommodation:
- Lone parents or couples with 1 child over the age of 1 year (no upper age limit)
 - Lone parents or couples with 2 children of the same sex (no upper age limit)
 - Lone parents or couples with 2 children of opposite sexes where both children are under the age of 10 years.
- 5.4 Two bedroom accommodation:
- Lone parents or couples with 2 children of opposite sexes where one is over the age of 10 years.
- 5.5 Three bedroom accommodation:
- Lone parents or couples with between 3 and 6 children.
- 5.6 Four bedroom accommodation:
- Lone parents or couples with more than 6 children.

6 Criteria for prioritising moves between temporary accommodation

6.1 Transfers between TA will be prioritised in the following order:

1. Transfer from TA found to be in serious disrepair that poses threat to life
2. Transfer from TA because of evidenced critical medical need e.g. TA accessed by stairs and tenant unable to negotiate
3. Transfer from non-council shared accommodation for families who have been in occupation for at least 5 weeks (to avoid penalties of sharing accommodation beyond 6 weeks)
4. Transfer from TA found to be unsuitable following a review.
5. Transfer from PSLs at least 5 months beyond lease expiry date
6. Transfer because of evidenced serious medical need
7. Transfer from TA found to be in serious disrepair that cannot be rectified while the tenant is in situ
8. Transfer from expensive TA to cheaper units
9. Transfer for overcrowding/under occupation.

Appendix C

Text to be added to the Temporary Accommodation Placement Policy

7 Priority for types of temporary accommodation

Placement in Hotels and Bed & Breakfast will only be made where there is no alternative supply. Where Hotels or Bed & Breakfast are the only option, the decision on which households are placed there will be governed by the Homelessness Code of Guidance and the Homelessness (Suitability of Accommodation) (England) Order 2003 (see Appendix A).

Temporary accommodation should not be considered suitable for a family with children under 2 if there is not enough space for a cot. Further, Haringey will support families to secure a cot where needed (see Appendix B 17.13).

Appendix A

Homelessness (Suitability of Accommodation) (England) Order 2003

Bed and breakfast accommodation

17.31 Bed and breakfast (B&B) accommodation caters for very short-term stays only and affords residents only limited privacy, and may lack or require sharing of important amenities, such as cooking and laundry facilities. Wherever possible, housing authorities should avoid using B&B accommodation as accommodation for homeless applicants, unless, in the very limited circumstances where it is likely to be the case, it is the most appropriate option for the applicant.

17.32 Living in B&B accommodation can be particularly detrimental to the health and development of children. Under section 210(2), the Secretary of State has made the [Homelessness \(Suitability of Accommodation\) \(England\) Order 2003](#) ('the 2003 Order'). The 2003 Order specifies that B&B accommodation is not to be regarded as suitable for applicants with family commitments provided with accommodation under Part 7.

17.33 Housing authorities should, therefore, use B&B accommodation to discharge a duty to secure accommodation for applicants with family commitments only as a last resort and then only for a maximum of 6 weeks. Applicants with family commitments means an applicant:

- (a) who is pregnant;

- (b) with whom a pregnant woman resides or might reasonably be expected to reside; or,
- (c) with whom dependent children reside or might reasonably be expected to reside.

17.34 For the purpose of the 2003 Order (as amended by the [Homelessness \(Suitability of Accommodation\) \(Amendment\) \(England\) Order 2023](#) (the 2023 Order), B&B accommodation means accommodation (whether or not breakfast is included):

- (a) which is not separate and self-contained premises; and,
- (b) in which cooking facilities are not provided, or any of the following amenities is shared by more than one household:
 - (i) a toilet;
 - (ii) personal washing facilities; or,
 - (iii) cooking facilities.

17.35 B&B accommodation does not include accommodation which is owned or managed by a housing authority, a private registered provider or a voluntary organisation as defined in [section 180\(3\) of the 1996 Act](#), or accommodation that is provided in a private home, such as lodging or as part of a sponsorship arrangement.

17.36 The 2003 Order provides that if no alternative accommodation is available for the applicant the housing authority may accommodate the family in B&B for a period, or periods, not exceeding 6 weeks in result of a single homelessness application. Where B&B accommodation is secured for an applicant with family commitments, the Secretary of State considers that the authority should notify the applicant of the effect of the 2003 Order, and, in particular, that the authority will be unable to continue to secure B&B accommodation for such applicants any longer than 6 weeks, after which the authority must secure alternative, suitable accommodation.

17.37 The [Homelessness \(Suitability of Accommodation\) \(Amendment\) \(England\) Order 2022](#) (the 2022 Order), as amended by the 2023 Order, modifies the 2003 Order to remove the 6 week limitation on placements in B&B between 1 June 2022 and 1 June 2024, where there is no accommodation other than B&B available, and where the applicant:

- (a) make an application to a local housing authority for assistance under Part 7 of the Housing Act 1996 on or after 1 June 2022;
- (b) make that application within 2 years beginning with the date on which they arrive in the United Kingdom;
- (c) are eligible for assistance under Part 7 of the Housing Act 1996; and

(d) did not have a right to occupy accommodation in the United Kingdom for an uninterrupted period of 6 months or more in the 3 years prior to the date on which they arrived in the United Kingdom.

- 17.38** When determining whether accommodation other than B&B accommodation is available for use, housing authorities will need to take into account, among other things, the cost to the authority of securing the accommodation, the affordability of the accommodation for the applicant and the location of the accommodation. A housing authority is under no obligation to include in its considerations accommodation which is to be allocated in accordance with its allocation scheme, published under [section 167 of the 1996 Act](#).
- 17.39** If there is a significant change in an applicant's circumstances that would bring the applicant within the scope of the 2003 Order, the 6 week period should start from the date the authority was informed of the change of circumstances not the date the applicant was originally placed in B&B accommodation.
- 17.40** If the conditions for referring a case are met and another housing authority accepts responsibility for an applicant under [section 200\(4\)](#), any time spent in B&B accommodation before this acceptance should be disregarded in calculating the 6 week period.
- 17.41** B&B accommodation is not suitable for 16 and 17 year old applicants even on an emergency basis.
- 17.42** The Secretary of State considers that the limited circumstances in which B&B accommodation may provide suitable accommodation could include those where:
- (a) emergency accommodation is required at very short notice (for example to discharge an interim duty to accommodate); or,
 - (b) there is simply no better alternative accommodation available and the use of B&B accommodation is necessary as a last resort.
- 17.43** The Secretary of State considers that where housing authorities are unable to avoid using B&B accommodation to accommodate applicants, they should ensure that such accommodation is of a good standard and is used for the shortest period possible.

Appendix B

[Homelessness code of guidance for local authorities](#) issued on 28th February 2024

Cots in temporary accommodation

17.12 Accommodation will not be suitable for a household with children under the age of 2 if there is not adequate space for a cot for each child aged under 2.

17.13 Where households with babies and young children under 2 do not have access to a cot when placed in temporary accommodation, housing authorities should consider what support is available for the provision of a cot. This may involve housing authorities assisting the household to access a cot through local authority or external schemes where needed, especially in emergency situations where a household might be homeless as a result of domestic abuse.

Report for: **Cabinet Member for Housing, Private Sector and Planning**

Title: Continued use of hotel accommodation to meet homelessness need

Report authorised by: **Beverley Tarka, Director of Adults, Health and Communities**

Lead Officer: **Linmora Blair, Head of Temporary Accommodation**

Ward(s) affected: **All**

Report for Key/
Non-Key Decision: **Key decision**

1.0 Describe the issue under consideration.

- 1.1 On 17 October 2023, the Council approved an additional £2 million funding from the Homelessness Prevention Grant to cover increased budget pressures resulting from the need to use hotels to provide accommodation due to the shortage of alternative accommodation.
- 1.2 Due to the ongoing shortage of alternative accommodation, Housing Demand Services has been forced to extend the use of hotels beyond the originally anticipated period of 31 December 2023.
- 1.3 As a result, there has been an additional overspend of £1.6 million on the Housing Demand Budget, with £1,009,515 specifically attributed to hotel costs incurred between January 2024 and March 2024.
- 1.4 The Housing Demand MTFS growth of £2.9 million in 24/25 assumes no continued use of hotels (bed and breakfast). However, the lack of alternative supply continues to be a challenge and so we have entered the new financial year with households still living in hotels. We forecast that this will result in a need to extend the use of hotel cost of £1,511,990 for the period April 2024 to July 2024.
- 1.5 The Housing Demand and Strategic Procurement teams are working together to create a hotelier framework. Initially, it was projected to be completed by March 31, 2024. However, due to resource constraints, the expected completion date is now July 2024.

2.0 Recommendations

Cabinet Member for Housing, Private Sector and Planning is asked to:

- 2.1 Note the continued pressures and reliance on the use of hotel accommodation to meet our statutory homelessness responsibilities, including the block-booked arrangements that the Council have entered into.
- 2.2 Note the additional overspend of £1.6m in the 2023/24 Housing Demand budget and the continued risk to the 2024/25 budget position.
- 2.3 Correct the error within the previous Cabinet report dated October 2023 as set out in the exempt part of this report where the incorrect value was attached to the hotels.
- 2.4 Agree the extension of the current contracts to include additional spend given the continued use of hotels and the delay in the delivery of the Hotel framework, as detailed in the exempt report.
- 2.5 Note that the delay in the procurement of the Hotel Framework and the revised delivery date.

3.0 Reasons for decisions

- 3.1 To correct the error within the previous Cabinet report dated October 2023 where the incorrect value was attached to the hotels and to approve the contract extensions to ensure compliance with regulations.
- 3.2 It is a legal requirement to provide interim accommodation to households who approach us for homelessness assistance if the Council have reason to believe they are homeless, eligible for assistance and in priority need, and to provide temporary accommodation to households once the Council have accepted a housing duty.
- 3.3 The continued shortage of supply has meant that the Council is unable to source enough self-contained accommodation and has thus needed to continue using hotels to meet its statutory duties.

4.0 Alternative options considered.

- 4.1 The option of doing nothing is not feasible as it is unlawful to leave families who are owed a duty without accommodation.
- 4.2 A series of mitigating actions are planned to reduce the use of hotel accommodation throughout the year but at this stage the Council have a continued need to use hotel accommodation to meet our statutory responsibilities.

5.0 Background Information

Statutory Duties

- 5.1 The Council has a statutory duty to provide interim accommodation to households where the Council has reason to believe they are homeless, eligible for assistance, and in priority need while the Council seeks to relieve their

homelessness and complete our investigations. If the Council accepts that it owes a household a main housing duty, the Council has a duty to provide suitable temporary accommodation until the households receives an offer of social housing or a suitable tenancy in the private rented sector.

- 5.2 Haringey uses a range of types of accommodation to meet these responsibilities, including use of our own hostel stock, general needs council homes on regeneration schemes and elsewhere and properties leased or licensed from private property owners. However, an increasingly challenging market has meant that the Council is unable to secure access to enough longer-term temporary accommodation, and for the first time for over a decade Haringey is using hotel accommodation.

Previous Report of 17 October 2023

- 5.3 The 17 October 2023 decision authorised the use of the additional £2 million from the Homelessness Prevention Grant to cover the increased budget pressures resulting from hotel use and supply pressures.

- 5.4 The decision also approved:

- the establishment of a Hotelier Framework with delegated authority given to the Head of Procurement to appoint hoteliers onto the framework;
- Delegated authority to the Director of Adults, Health and Communities (following consultation with the Lead Member for Housing Services, Private Renters and Planning), to award block contracts for hotel accommodation commissioned from the Hotelier Framework valued from £500,000 up to a maximum of £2 million.

Continued Supply and Demand Pressures

- 5.5 Although Haringey continues to deliver top quartile performance on homelessness prevention, the Council is seeing an increase in demand in three main areas – evictions from the private rented sector, approaches from refugee households, and approaches from people fleeing domestic abuse.
- 5.6 There has also been a London-wide reduction in the availability of both affordable private sector lets and properties available for use as temporary accommodation as owners look to exit the sector or are able to get higher rents from private tenants.
- 5.7 The Council recognises that the use of hotel accommodation to meet our statutory duties has a significant impact on the households placed there and presents significant financial and reputational risks to the Council. The Council has therefore developed a B&B Elimination Plan (appendix 1) to move away from a reliance on hotels as soon as possible.
- 5.8 As set out in the previous report, as of 25 September 2023, there were 103 households living in hotels, The number of families living in hotels has increased to 119 at the end of March. The average stay in B&B has reduced to 12 weeks compared to 16 weeks in November 2023.

5.9 The situation has meant that the Council has needed to enter into arrangements with hotels to meet this pressure and this report seeks to highlight the additional spend incurred in order to meet our statutory requirements and to provide information on the arrangements the Council have entered into.

Budgetary pressures

5.10 The unprecedented increase in hotel usage was not accounted for in the 2023/24 budget.

5.11 In the previous report, the Council projected a spend of £2.7m with an income generation of £0.7m creating a net pressure of £1.979m.

5.12 As of January 2024, the forecast spend has risen to £4.5m with an income generation of £0.9m, leaving a net budgetary pressure of £3.5m.

5.13 The revised forecast has thus left a gap of £1.6m more than the previous forecast.

B&B Elimination Plan

5.14 The B&B Elimination Plan contains a range of actions against the following set of headings:

- Prevention of Temporary Accommodation need against main causes of Family Homelessness
- Reducing/End family B&B initial placements. Managing move on from Emergency placements.
- Increasing supply of suitable accommodation

5.15 Since the report of 17 October 2023, the B&B Elimination Plan has succeeded in moving families out of hotels and has stabilised our position and reducing the length of stay in the accommodation despite continued demands.

5.16 However, it also faces continued challenges as the number of voids has under-delivered and the number of new build homes have been delayed. The Appendix 1 illustrates an update on the B&B Elimination Plan.

5.17 The table below shows the number of household accumulative moves out of B&B between November 2023 and April 2024

	15-Nov	19-Dec	24-Jan	12-Feb	02-Apr
Housed	48	57	61	71	81
Moved	63	88	100	115	136
DOD	21	27	26	29	32
Other	13	14	15	20	22
	145	186	202	235	271

6.0 Contribution to the Corporate Delivery Plan 2022-2024 High level Strategic outcomes

Homes for the future

- There will be a decrease in the number of families who need to live in temporary accommodation.
- Further development of supply options to support the avoidance of temporary accommodation where possible but ensuring the quality of TA supply when needed.
- There will be a co-ordinated and compassionate response single adults who are facing homelessness.
- There will be a decrease in rough sleeping in the borough.
- We will ensure that our council housing is allocated fairly to those in housing need and that the Council make best use of our stock.

7.0 Carbon and Climate Change

Not applicable

8.0 Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities

Finance

- 8.1 Finance notes the content of this report. The additional overspend is a variation from the quarter 3 position and will be reported in the year end provisional outturn.
- 8.2 The additional overspend will increase the overall budget gap and the need for further savings.
- 8.3 Further finance comment is contained in the exempt report.

Strategic Procurement

- 8.4 Strategic Procurement has been consulting with colleagues in housing demand to establish a Hotelier Framework to provide a compliant and flexible process for commissioning hotel rooms in accordance with the Public Contract Regulations.

The establishment of a Hotelier Framework is in progress with a planned go live of July 2024.

- 8.5 CSO 16.02 permits the Leader to delegate decisions whether urgent or not to the Cabinet Member having the relevant portfolio responsibility.
- 8.6 Additional Procurement comments are contained in the exempt part of this report.

Legal

- 8.7 The Assistant Director of Legal and Governance (Monitoring Officer) has been consulted in the drafting of this report and comments as follows.

- 8.8 By s188(1) of the Housing Act 1996 the Council has a statutory duty to secure accommodation for those persons who approach the Council and whom the Council has reason to believe may be eligible, homeless and in priority need and whom it is not satisfied are intentionally homeless, pending a decision on those matters.
- 8.9 By s192(3) of the same Act the Council has a statutory duty to secure accommodation for those whom it has found to be eligible, homeless (not intentionally) and in priority need.
- 8.10 The Homelessness (Suitability of Accommodation) (England) Order 2003 restricts the use of hotel accommodation, particularly for those with family commitments, to use as a last resort and for limited periods. The Code of Guidance advises that “the Secretary of State considers that where housing authorities are unable to avoid using B&B accommodation to accommodate applicants, they should ensure that such accommodation is of a good standard and is used for the shortest period possible.”
- 8.11 The Council has a general power of competence under Section 1(1) of the Localism Act 2011 to do anything that individuals may do, provided it is not prohibited by legislation. The Council may exercise the general power of competence for its own purpose, for a commercial purpose and/or for the benefit of others. Further, the Council has power under S.111 Local Government Act 1972 to do anything which is calculated to facilitate, or is conducive or incidental to, the discharge of any of its functions. The recommendations within this report are in accordance with these powers.
- 8.12 The suggested procurement of a framework agreement for using hotel accommodation for provision of temporary accommodation does not constitute leasing of properties and therefore falls within the scope of the Public Contracts Regulations 2015 (PCR 2015). The procurement constitutes a public services contract for the purposes of the PCR 2015 and as the estimated value exceeds the financial threshold for these services, the procurement must be run in accordance with the rules stipulated under the PCR. Reg 33 provides that the establishment of a Framework Agreement is a compliant method of procurement under the PCR 2015. Further, the suggested procurement is in line with CSO 7 which allows for the use of a Framework Agreement as a procurement process. The Council must ensure best value is achieved through the suggested procurement.
- 8.13 The Cabinet Member with the relevant portfolio has power to approve the recommendations under CSO 16.01 which provides that in-between meetings of the Cabinet the Leader may take any such decision or may allocate to the Cabinet Member with the relevant portfolio.
- 8.14 There are no legal reasons why the Cabinet Member with the relevant portfolio should not approve the recommendations in this report.

Equality

- 8.15 The council has a Public Sector Equality Duty (PSED) under the Equality Act (2010) to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act.
- Advance equality of opportunity between people who share protected characteristics and people who do not.
- Foster good relations between people who share those characteristics and people who do not. The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty. Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

8.16 The report in question is regarding the council's provision of temporary accommodation, namely the use of hotels, the financial risk to the council as a recently awarded homeless prevention grant is nearly used up and the B&B elimination plan, which contains a range of actions aimed at reducing and then eliminating our use of hotel accommodation by the end of the year.

8.17 Data held by the council suggests that women, young people, BAME people, those who identify as LGBTQ+, disabled individuals and those from a low socioeconomic background are known to be particularly vulnerable to homelessness. As such, any action to ensure a good supply and improve the quality of temporary accommodations should positively impact those who share these protected characteristics. In the same vein, any outcomes that limit the supply of temporary accommodation would have a negative impact on those who share these protected characteristics.

9.0 Use of Appendices

9.1 B&B Elimination Plan update

10.0 Background Papers

10.1 None

This page is intentionally left blank

ACTION PLAN FOR ENDING USE OF B&B				
No.	TASKS	BY WHO	BY WHEN	UPDATE
1	Implementation of Plan			
1.1	Ensure Corporate and operational commitment to cease using B&B for families by Thursday 4th January 2024.	All	Immediate	
1.2	Use this template as a self-assessment approach to identify any additional actions. Actions to be added to existing Supply Plan.	SMT	30/06/23	Completed
1.3	Housing Needs Officers continue to have targets for prevention and relief that contribute to the overall Corporate Delivery Plan – reported on monthly to Performance Clinic.	BF	ongoing	
1.4	Paper to Housing and Placemaking Board – first is an analysis of the issues leading to our current position and the second will report the outcome of a self-assessment against the DLUHC checklist and resulting actions.	DG	25/5/23 and 14/09/23	Completed
1.5	Paper to Corporate Leadership team.	DG	29/6/23	Completed
1.6	Discussion at Housing Sub Group of the HSAB and HSCP.	DG	21/6/23	Completed

1.7	Briefing of new Lead Member in June and on-going conversation.	DG	15/06/23	Initial briefing completed
1.8	Cabinet Strategy discussion on the position and areas for policy consideration.	DG	TBC	
1.9	Consider other ways to disseminate messages corporately – Leadership Forum, presentation during budget fortnight.	DG	Leadership session by end of 2023	Budget Fortnight session completed. August 23.
1.10	Staff events to discuss the current situation and identify actions.	DG	20/6/23 and 29/6/23	Completed
1.11	Expand the Housing Related Support led Introduction to Homelessness Briefings, to include input from teams across Housing Demand.	MW/BF/LR	From Sept 2023	Completed
1.12	Set additional targets that are outcomes focused - based on where people will be going from B&B. For example, % of placement in pathway for single people, % of placement in the PRS, % in alternative TA (PSL/NPA) % of placement OPS, Reports through monthly Performance Clinic.	CA	From Sept 2023	Completed
1.13	Continue to update Yammer and keep staff informed and engaged in this: simple visual on progress – position on a weekly basis split by families and singles. <ul style="list-style-type: none"> ○ Include a good news story on a weekly basis of number of families moved and location moved to etc. ○ Share service briefing 	SMT	Early Sept 23	Ongoing

1.14	Develop a Risk Log – impact of B&B use on stakeholder services, service and Council – risks and mitigations (increased litigation, cost), ombudsman – headlines on risks goes to managers who can share with staff. Lesson learned/operational group.	CA	15/09/23	completed
1.15	Set up Multi-agency Homelessness Reduction Board with initial emphasis on B&B Elimination.	DG/HA	1st meeting by end of Oct 2023	1st meeting taking place on 30th November

2	Prevention of TA Need Against Main Causes of Family Homelessness			
2.1	We will continue with co-location of Housing Needs staff to ensure early identification of homelessness. Most recent published DLUHC data indicates we are performing well in terms of early intervention as majority of cases picked up at prevention stage.	BF	On-going	
2.2	Private Rented Engagement Team (PRET) to continue to review previous AST placements to identify opportunities to intervene if there are arrears and to renew tenancies.	BF	ongoing	
2.3	Review of Tenancy sustainment approach when we consider the structure needed to deliver ASTs following our exit from Capital Letters.	DG/BF/LB	Sept. 2023	New structure to be in place early 2024
2.4	Housing Needs Officers aware that home visits will now be required in majority of cases to try to mediate/negotiate in person. Obstacles to undertaking home visits reduced, e.g. all HNOs issued with tape measures.	BF	ongoing	

2.5	Home visit pro-forma to be developed for use by Housing Needs to ensure consistency and quality.	BF	30/06/23	Completed
2.6	Budget for Prevention Fund for 2023/24 in place and in use.	BF	ongoing	
2.7	Review the measure used to define whether Prevention Fund payment is VFM as this was largely based on a figure of £4500 being used and this is based on cost of NPA – costs of B&B are significantly higher and we may want this reflected in our decision making on use of Prevention Fund. Increase Homelessness Prevention fund from HPG to reflect this.	DG/BF	15/7/23 30/8/23	Completed - Housing Needs Team have scope to present cases to HNM where a larger payment is required.
2.8	Hearthstone to continue to identify alternatives to TA for victim/survivors of DA, working with HRS to install Sanctuary Rooms/ attending MARAC to offer advice on alternatives such as management transfers etc.	FB	Ongoing	We continue to look at options for tenancy sustainment for families- i.e. looking at emergency lock changes and access to civil remedy to prevent clients from displacement. Working with partners at MARAC to advise on the current situation and asking for support to refuge where possible.
2.9	Hearthstone to work with VAWG partners to advise and explore alternative legal remedies- I.e., occupation orders etc.	FB	Ongoing	Now co-locating with wood Green CSU (police) to look at case by case and bail

				conditions and serving DVPN's on perps to allow V/S's to remain in the home as opposed to being the ones displaced.
2.10	Introduction of floating support worker to support victim/survivors who move to safe accommodation or have Sanctuary measures installed. Allocate a budget for personalised support.	FB	June 2023	Completed
2.11	For transport funding to be provided to DA cases accessing refuge space outside of London for same day travel where available and possible in order to avoid vulnerable families being placed in B&B.	FB	From June 2023	Completed
2.12	Upstream Prevention: <ul style="list-style-type: none"> ○ Use of Policy in practice dashboard to identify opportunities for early intervention. ○ Use information to inform/commission new area of activity. ○ hospital discharge funding ended – negotiate on potential extension through BCF. 	BF BF/DG MW	On-going 30/9/23 15/7/23	Hospital discharge post funding secured for 12 months

3	Reduce/End Family B&B Initial placements
----------	---

3.1	<p>Ensure all B&B cases have ownership and move-on plan. Weekly B&B elimination meetings commencing 7th June to go through individual B&B cases to ensure move-on is progressing. Attendance from AO, Needs, Rehousing, Pathway, Lettings (SH and GN), Supply Team, Voids and Heads of Service.</p> <p>○ TOR needed</p>	LR/LB/BF/CA	From 7 June 2023	Implemented
		LR/LB/BD/CA	End of August	Completed
3.2	Continue with current EA approval process as this robustness provides assurance that EA is the last option; all placements to be approved by two Housing Needs Team Managers.	BF	Ongoing	
3.3	Where B&B is the placement option additional sign off needed by HoS for Rehousing and Lettings, HoS for Supply and Contracts or AD.	LB/LR	Ongoing	
3.4	Daily monitoring of the B&B elimination spreadsheet: identifying status of case and move on options for move on meeting - B&B Daily report (TA0207) implemented with day count from placement in B&B and family type.	SMT & managers	Ongoing	
3.5	Ensure that any available PRS properties are used to prioritise moves for households in B&B or to those where placement into B&B is imminent. Prioritisation Implemented from May 2023.	BF/LR/LB	From May 2023	Implemented

3.6	Reduce number of Prohibition Notices from HIT – arrange to do more works in default funded by Prevention Fund and arrange for Charges to be put on property.	LS /BF	30/09/23	We are continuing to explore whether this is practicable and a response we can deliver.
-----	--	--------	----------	---

4	Manage Move-On From Emergency Placements			
4.1	Decision taken to leave Capital Letters and undertake AST sourcing inhouse. Staff returned and we have an interim structure in place. New AST incentive promotional offer to be reviewed after 3 months.	DG/BF/LB	Review Sept 2023	Completed Incentives reviewed and agreed facility to increase base offer on a case-by-case basis
4.2	Trial rent top-ups to market levels in exceptional cases (e.g. SEND) where there are risks of additional costs for the authority in addition to the B&B costs.	BF/LB	From July 2023	ongoing
4.3	Review structure for delivery of ASTs and tenancy sustainment, given market pressures.	DG/LB/BF	From Sept. 2023	Pending – will be part of wider structure review
4.4	Use IBAA data to compare and breaches and continue to be part of the sub-regional and London wide discussions.	DG/LB	Ongoing	Ongoing
4.5	Increased IBAA rates in April 2023 and held one to one negotiation with provider to try and avoid the loss of existing stock and explore any new opportunities.	LB	From April 2023	Ongoing

4.6	Engage with RP's (in liaison with Housing Strategy Team) on opportunities for them to support us with our homelessness challenges e.g. review of Nominations agreement, how they manage evictions and need to move with their own tenants, sale/lease, interim use while they decide what to do, or noms to perm.	HA/LH/DG	From August 2023	Ongoing – To Date have met with 11 Registered providers
4.7	Pursue any acquisition opportunities resulting from these conversations. Participation in L&Q led discussions with G15 on opportunities for joint working. Offer of assistance to support the work.	RE/DG RE/DG	From Sept. 2023 1 st meeting – 15/8/23	Discussions are ongoing
4.8	All available TA properties are matched to households in B&B and also short stay hostels; thus reducing reliance on hotels and creating vacancies for new placements. To further use properties to prevent hotel placements for accepted homeless households, facing eviction from their TA due to landlords requiring their properties back.	LR	Ongoing	Ongoing - All alternative TA is explored with priority given to families in B&B.
4.9	TA properties are matched early and offers are made when a property is available to occupy with immediate offer letters sent. An additional Temporary Accommodation Placement Officer will be engaged to support the team (expected August)	LR	Ongoing	Ongoing – out to advert and hope to have additional staff in post by February 24

4.10	<p>Deliver improvements in the end-to-end voids process to ensure that households are moved on to settled accommodation at the earliest possible time.</p> <ul style="list-style-type: none"> ○ Deliver improvements on repairs to voids in line with Housing Transformation Plan. ○ Provision of accurate SFAD and RFL dates ○ Timely advertising or matching ○ New Viewings Officers will improve the process of letting permanent homes. ○ Sign up arrangements reviewed and changes embedded. 	<p>CB/JR</p> <p>CB LR LR</p> <p>NP</p>	<p>On-going</p> <p>On-going</p> <p>30/6/23</p> <p>Sept 23</p>	<p></p> <p>Ongoing</p> <p>Complete</p> <p>Complete</p>
4.11	Weekly void meetings across all services designed to accelerate void turnaround times across all forms of void properties; general needs, sheltered housing, private sector leased properties and hostels.	CB/LR	Ongoing	Weekly Void meetings take place with a second meeting of departmental leads to monitor progress.
4.12	Clearance of backlog of HCBS voids. Approach agreed at PHB.	RE	Feb 2024	Appointment of contractor completed. Estimated works completion Feb 2024
4.13	Explore options for bring High Road West voids back into use to ease immediate pressures and minimise the impact of the closure of Whitehall Lodge in Jan 2024 and HRW decants.	CB/JR	TBC	

4.14	Annual Lettings Plan commitments. To be published in Sept, this will outline the pressures of TA and hotel placements and commit the Authority to maintaining lets to homeless households, using own stock as TA and ensuring that vulnerable, single people avoid TA through quotas for care leavers, people with complex needs, people with Learning Disabilities and Housing First allocations.	LR	30/9/23	To be completed
4.15	Allocations Policy review.	RE/DG	Ongoing	Will present a draft Allocations Policy to Cabinet in the first half of 2024
4.16	Increase use of one bedroom Council properties as temporary accommodation and prioritising moves from hotels and short stay hostels. Set clear targets and monitor delivery.	LR	Ongoing	This is ongoing – targets set and monitored via Supply Plan Group
4.17	Agree use of some larger in borough Council properties as TA for families who need to stay locally due to family needs.	DG/LR	15/7/23	Completed
4.18	Rehousing assessments and personalised housing plans carried out within one month of cases being accepted; bringing this forward for customers in hotels.	LR	Ongoing	Targets set as described and highlighted in regular supervision.

5	Increase Supply of Suitable Accommodation			
5.1	Ensure that the Council is making best use of its regulatory powers such as Empty Dwelling Management Orders/ Compulsory Purchase Orders.	LS/DG	30/9/23	The private sector housing team continue to investigate privately owned long-term empty homes and will take action via our enforcement route in line

				with the Council's empty homes policy. In November 2022, four properties were put to Cabinet for the recommendation to use CPO to bring those properties back into use. These were approved by Cabinet and as a result three out of the four properties are now being renovated in order to be occupied or sold. A further set of properties likely to be put to Cabinet in 2024 following owners non-compliance with the empty homes enforcement procedures
--	--	--	--	--

5.2	<p>Work with emergency accommodation providers to ensure that there is a robust documented process in place to retain as many NPAs as possible due when households move and cancellations are made. ○</p> <p>Supply team to be advised when EA is ending to ensure conversation with owner to retain.</p>	LB/LR	<p>31/08/23</p> <p>From 03/07/23</p>	ongoing
-----	---	-------	--	---------

				Autumn 2024 following a competitive Tender for the modular fabrication and groundworks.
5.5	Review option to extend Russell Road hostel to maximise occupancy and meet the needs of families.	SW/DG	TBC	Business case drafted. Meeting arranged to look at possible options.
5.6	Consider options for delivering other opportunities identified in the hostel review.	RE/SW	31/10/23	ongoing
5.7	Produce a clear estimate of future need by TA types and property sizes to inform a procurement/purchase programme. Model differing supply scenarios and maximising the most cost effective. Identify business analyst resource to support this work.	LB/HA/SL DG	End Of Oct 2023 1/10/23	See below Analyst identified – Scoping completed and project completion target April 24.
5.8	Use needs analysis to work with colleagues and stakeholders to look for vacant or owned by the council buildings that could be temporarily used for short- or medium-term temporary housing. For example, Hornsey Townhall, Hale Road, Caretaker houses, S106 N22.	LB/DG/SL/ CT	On-going but firm up options with analysis	
5.9	Continue to negotiate on existing LBH leases at expiry or when void, or as new acquisition and transfer to Homes for Haringey leases.	LB	Ongoing	

5.10	Develop a clear lease offer, including repairs and management, and promote to landlords and agents – leading to an increase in the number of leases.	LB	By 30/9/23	Looking at bulk lease arrangements in order to form a package to landlords offering this approach.
5.11	Review of ‘peppercorn’ lease arrangements to identify any that should/could be brought to an end/repurposed.	SF	Ongoing	
5.12	Undertake a full programme of visits to all units of temporary accommodation.	LB	Ongoing	Officers in Place
5.13	Undertake risk assessed checks in our social housing stock to identify sub-letting etc (estimate of 1% minimum)	JR	TBC	
5.14	Bid to LAHF 2 (2 units of Afghan refugee move on accommodation and 18 units of TA) Deliver the agreed units.	RE RE	5/7/23 By March 2024	MoU signed on 11/8/23 30 units of accommodation to be delivered
5.15	Deliver the new homes programme - 3,000 new social rent homes	RE	Delivery over 3 years of the programme	Monitoring through New Homes Board.
5.16	Explore whether any of the hostels have any office/storage/communal space that could be repurposed with the addition of rented shower pods to be used as additional capacity.	LB	15/09/23	Project to be completed by year end

6.	Increase Supply of Suitable Accommodation for Single Adults			
----	--	--	--	--

<ul style="list-style-type: none"> Continue to identify and bid for funding to increase provision of supported housing (RSAP, SHAP, RSI, targeted additional RSI funding). Conduct a review of singles entering B&B and identify of any gaps in provision – improvement in performance for void utilisation including any barriers at Osborne Grove (directly delivered assessment service). Conduct a review of the current Pathway provision and process. Consider opportunities to reduce the assessment criteria for entry into pathway. Conduct a review of move on – where are the majority of people identified for move on going/waiting for within pathway services and Osborne Grove Consideration/identification of funding to recommission or directly deliver a Hale Road model for emergency 24-hour placements. (Survey was due in May to confirm refurb costs and inform decisions but the houses are squatted). Confirm hospital discharge continuation funding and discuss the on-going use of Stokely Court units as hospital discharge accommodation. Consider extension of use of Stokely Court or alternative sheltered provision to meet immediate needs of homeless older people who are waiting for an allocation of sheltered housing. Consider options for delivery of safe accommodation for single or pregnant women who are homeless due to domestic abuse. 	MW/TD	Sept 23	Complete – SHAP and additional PHB successful
	MW/TD	Oct 23	Complete
	MW/TD	By Sept 23	Ongoing – unlikely to offer any material outcome prior to plan target date.
	MW/TD	Aug 23	Complete
	DG/MW	TBC	In progress – no budget currently identified for delivery of a service due to savings ask across the Council.
	DG/MW/NP/HT	31/7/23	Complete
	DG/MW/NP/HT	31/7/23	Complete

		DG/MW/FB	31/8/23	No funding available to deliver on this objective currently. Will keep liaising with the GLA on possible funding streams.
--	--	----------	---------	---

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

Document is exempt

This page is intentionally left blank