

NOTICE OF MEETING

CABINET MEMBER SIGNING

Monday, 4th July, 2016, 9.00 am - Civic Centre, High Road, Wood Green, N22 8LE

Members: Councillor Alan Strickland (Chair)

1. **FILMING AT MEETINGS**

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2. **URGENT BUSINESS**

The Cabinet Member will advise of any items they have decided to take as urgent business.

3. **DRAFT TEMPORARY ACCOMMODATION PLACEMENTS POLICY (PAGES 1 - 44)**

The report will seek the Cabinet Member's approval to consult on the proposed Temporary Accommodation Placements Policy, in order to assess the impact and prepare a final version of the policy, and the Equalities Impact Assessment. Both the Temporary Accommodation Placements Policy and the wider Housing Supply Plan will be reported back to Cabinet for approval.

4. NEW ITEMS OF URGENT BUSINESS

To consider any new Items of Urgent Business admitted under Item 2 above.

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Bernie Ryan
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River Park House, 225 High Road, Wood Green, N22 8HQ

Friday, 24 June 2016

Report for: Lead Member Signing, 4th July 2016

Item number: 3

Title: Draft Temporary Accommodation Placements Policy

Report authorised by: Lyn Garner, Director of Regeneration, Planning and Development

Lead Officers: Mustafa Ibrahim Head of Housing Commissioning, Investment and Sites
Denise Gandy Director of Housing Demand, Homes for Haringey

Ward(s) affected: All

Report for Key/ Non Key Decision: Key Decision

1. DESCRIBE THE ISSUE UNDER CONSIDERATION

- 1.1. The purpose of this report is to set out the draft Temporary Accommodation Placements Policy and introduce the housing supply and demand planning framework that the policy responds to. The supply and use of temporary accommodation is a critical factor in responding to demand, in particular homeless households who approach the council in acute housing need.
- 1.2. The council is preparing a detailed assessment of supply and demand for housing in the borough and the current outlook is summarised in appendix 1. It is clear that in order to deal with the continuing demand for temporary accommodation, property will have to be sourced outside the borough boundary. A Temporary Accommodation Placements Policy is required for this.
- 1.3. This report seeks approval to consult on the proposed Temporary Accommodation Placements Policy, in order to assess the impact and prepare a final version of the policy, and the Equalities Impact Assessment. Both the Temporary Accommodation Placements Policy and the wider Housing Supply Plan will be reported back to Cabinet for approval.

2. CABINET MEMBER INTRODUCTION

- 2.1 We are committed to assisting people who approach the council in crisis in acute housing need. This will often mean providing either short term or more settled temporary accommodation, or both, and this is becoming increasingly difficult to do within Haringey. The supply of private rented accommodation in the borough or nearby is inadequate to meet need and in any case the market is leaving many households behind as rents continue to rise beyond what lower income households, including those affected by the benefits cap, can reasonably afford. In these circumstances more affordable accommodation in other locations has to be considered.

- 2.2 We will always prefer to offer accommodation within Haringey or nearby when it is possible to do so and have steadfastly maintained this position, despite the pressures that have prompted a number of other London authorities to place people outside of their boroughs and in some cases outside of London. We have resisted implementing this, recognising that it may be unwelcome for homeless households who have strong links to Haringey and inappropriate for those who may be vulnerable. Reluctantly, we now have to accept that the pressures have reached a point where we can no longer avoid joining the other councils who have taken this step.
- 2.3 In order to best protect and support vulnerable households, the council wishes to prioritise them for accommodation within the borough. This means that some households that are not prioritised to remain will be offered accommodation outside of Haringey, but this will be a last resort. It is therefore important that when we do have to place households outside of Haringey, we do so consistently, fairly and transparently using criteria designed to safeguard the most vulnerable and those with the highest need to stay within Haringey. It is also important that we provide the necessary support to enable households to relocate as easily as possible in these circumstances.
- 2.4 The draft policy and this report set out the sensitive approach we will take to this. It is right that people affected or potentially affected by this policy have the opportunity to provide feedback on the impact of the policy and in particular the support arrangements that will be necessary to mitigate the impact. I welcome the proposed consultation and will listen carefully to residents' views, and those of all consultees, in order that a final policy can take these account before approval and implementation later this year.

3. RECOMMENDATIONS

It is recommended that the Lead Member:

- 3.1 Notes that the council's Housing Supply Plan is being developed in response to current and forthcoming pressures on affordable housing supply in Haringey, as set out in the report and summarised in appendix 1.
- 3.2 Notes the draft Temporary Accommodation Placements Policy set out in appendix 2 and the draft Equalities Impact Assessment that accompanies it, attached as appendix 3.
- 3.3 Authorises consultation with those residents who may be affected by the draft Temporary Accommodation Placements Policy, and with key stakeholders as set out in the report, in order that the policy and the draft Equalities Impact Assessment can be finalised.
- 3.4 Notes the proposed support package for households placed outside London set out in paragraph 6.17, which may be subject to change as a result of consultation, and that specific budget provision for this may be required.

4. REASONS FOR DECISION

- 4.1 There are currently over 8,000 applicants on the housing register and every year around 500 new statutory homelessness duties are accepted by the council. As housing supply is reducing and becoming more expensive, there is a need to take steps to ensure the council can better respond to those who approach the council as homeless and in acute housing need. There is a particular issue with the supply of homes that can be used as temporary accommodation and changes to the sourcing and allocation of temporary accommodation are required to address this.
- 4.2 Where the council has a prima facie responsibility to households presenting in acute housing need it must source suitable affordable accommodation for that household; increasingly this is becoming more difficult to locate inside and close to the borough boundary. A placement policy is therefore required to be applied in the case of placement into temporary accommodation outside of the borough. A decision is required in order that the council can move to adopt this new Temporary Accommodation Placements Policy.

5. ALTERNATIVE OPTIONS CONSIDERED

- 5.1 All feasible options to improve supply and meet demand have been considered and will be further considered as part of the Housing Supply Plan.
- 5.2 The procurement and allocation of temporary accommodation has become increasingly difficult within the Haringey and London market. Alternative options to meet demand are not available to the council within current budget provisions and the allocation of any additional funding would detrimentally affect the provision of other council services.
- 5.3 The council could choose not to adopt a placement policy for temporary accommodation. However, officers must be able to demonstrate a clear rationale, eligibility criteria for suitable placements and consideration of support packages in order to comply with current case law and be clear and transparent about its placement activity.

6. BACKGROUND INFORMATION

Strategic Context

- 6.1 The supply of affordable housing in Haringey is diminishing as a result of a housing market which has made private renting or home ownership unaffordable for the majority of people in housing need, while new home building is not meeting national or local targets. Meeting the demand for affordable housing, whether for use as permanent homes or temporary accommodation (TA), is an increasingly serious problem for the council.
- 6.2 In particular there is a shortage of suitable homes for use as TA. The increasing difficulties with securing suitable TA within the borough were becoming evident in 2013-14. Although an in principle decision was made some two years ago to source properties outside the borough, implementation was deferred due to concerns about the impact on homeless households and in particular on vulnerable people. Instead more focus was placed on managing demand and preventing homelessness, while at least half of London's borough

councils have already adopted a policy for placing people beyond their boundaries, including outside of London. They include:

- Barking & Dagenham
- Barnet
- Brent
- Bromley
- Camden
- Hammersmith & Fulham
- Harrow
- Hounslow
- Kensington & Chelsea
- Lambeth
- Lewisham
- Merton
- Newham
- Redbridge
- Waltham Forest
- Wandsworth
- Westminster

In addition a further five authorities (Croydon, Ealing, Enfield, Islington and Southwark) are currently preparing policies for adoption.

- 6.3 Measures to manage demand in Haringey have been very successful; homelessness preventions have increased significantly, greater emphasis is being placed on conciliation and crisis intervention and on assisting people into alternative accommodation. Incentives are available to landlords to provide private rented accommodation and a new pathway has been implemented to improve provision of supported housing as an alternative to TA.
- 6.4 Despite this commitment to prevention, early intervention and measures to minimise the need for TA, the number of households in TA has been increasing. Residents to whom the council has a statutory duty to accommodate are having to wait longer to be rehoused while the supply of TA for them is diminishing and becoming more expensive. As well as requiring council subsidy, more expensive private rented accommodation is simply unaffordable and increasingly is not providing a settled and sustainable solution for homeless households.
- 6.5 The situation is being exacerbated by legislative and policy changes affecting housing, planning and welfare benefits. Welfare benefits changes in particular have had an adverse impact for many families and the biggest single reason for homelessness acceptances now is eviction from private rented accommodation. The changes made or planned include the benefit cap, a freeze on Local Housing Allowance (LHA, which determines maximum housing benefit levels), restrictions on LHA rates for under 35s, the introduction of the spare room subsidy ("bedroom tax") and the introduction of Universal Credit, under which housing benefit will be paid to tenants rather than direct to landlords. The cumulative impact of these changes is a reduction of private sector accommodation available for prospective tenants, more evictions from the

private sector and a consequent increase in demand for social housing. This is very serious for those requiring TA, as the council relies on private rented homes for the bulk of its TA supply.

- 6.6 Other provisions in the Housing and Planning Act 2016 will bring pressures to the supply of both new affordable housing, through the new Starter Homes initiative, and existing social rented housing through the introduction of Right to Buy for Housing Association tenants, forced sales of council homes and Pay to Stay. The Pay to Stay provisions may result in tenants exercising their Right to Buy rather than pay higher rents, resulting in a further reduction of council housing stock.
- 6.7 Further changes are expected to the subsidy regime related to the costs of TA, although these details are not yet published and will not come into force until 2017.
- 6.8 In addition, the councils own ambitions for estate renewal (while eventually increasing the overall housing stock in the borough) will in the short term bring some pressures on council housing stock as re-housing requirements are met.
- 6.9 In general, the cumulative impact of these changes, coupled with local housing market conditions, will be to exacerbate the lack of affordable housing in Haringey and impair the ability of the council and its partners to meet the demand for it. In these circumstances the council has little option but to seek to widen the available pool of affordable supply, which means securing affordable accommodation outside the borough.
- 6.10 To inform this, officers are producing an assessment of current and projected housing supply in order to show how demand can be met for permanent and temporary accommodation. This new Housing Supply Plan will cover the full range of supply in the borough, in three broad areas as follows:
- (a) Making the best use of the available social housing stock, council and registered provider (RP), including effective voids control, under-occupation transfers and the take-up of housing association nominations.
 - (b) Increasing the supply of all forms of permanent and/or settled homes for those in need of rehousing, from all sources, including estate renewal/regeneration schemes, council new build, acquisitions, housing association new build/acquisitions, bringing empty homes back into use and initiatives to access the private rented sector.
 - (c) Increasing the supply of homes for use as temporary accommodation, for those awaiting permanent and/or settled homes.

The Supply Plan is one of a number of policies and plans that underpin the Housing Strategy. The TA Placements Policy also forms part of this suite and following consultation will, along with the Supply Plan, be brought to Cabinet for approval later in 2016.

Temporary Accommodation Placements Policy

- 6.11 Haringey has more than 3,000 homeless households currently in TA. After some years of a downward trend on TA numbers, the recent trend has been

upwards. The future projections (summarised in appendix 1) assume that proposed and planned new approaches to TA will be effective in reversing this trend but nevertheless a significant gap between demand and supply remains. In summary there are more people going into TA than are coming out of TA.

- 6.12 Currently first stage TA (i.e. emergency accommodation while a homelessness application is assessed) is predominantly nightly-charged accommodation that has to be spot purchased in response to demand. The placement of these applicants is therefore determined largely by immediate availability. The shortage of second stage accommodation means people are staying in emergency accommodation longer, for significant periods after a homelessness decision has been made. Families in second stage TA (i.e. accepted homeless cases) are waiting longer to be re-housed as the number of permanent homes available to re-let is reducing.
- 6.13 The current approach is to seek to procure accommodation within the borough or close by but we are now in a position where there is insufficient supply and we can only meet our statutory obligation by sourcing suitable TA out of the borough. One of the key tests of suitability is affordability, and affordable rented properties are not available in sufficient numbers within the borough. Inevitably, we will have to increasingly look throughout London and outside of London to source suitable properties that meet the affordability requirement for homeless households.
- 6.14 This position has a serious impact on homeless families. It is apparent that there is a need for the council to change its approach to TA procurement and allocation in order to be in a position to assist residents who approach in acute housing need. In doing so, it is important that we move to a more structured and transparent approach to placing homeless families and determining who should be prioritised for in-borough accommodation and to allocating out-of-borough placements in accordance with robust and transparent criteria. This is what the TA Placements Policy is seeking to do.
- 6.15 The proposed TA Placements Policy is attached (appendix 2). In summary, the policy includes:
- Statutory requirements for both interim (s 188) placements and longer term (s193) placements.
 - The arrangements for temporary accommodation offers and dealing with refusals.
 - Factors to consider in assessing the suitability of accommodation, including size, location, availability of support networks, health factors, proximity to education and employment.
 - Criteria for prioritising placements inside the borough and within neighbouring boroughs.
 - Minimum size criteria for the accommodation offered to different types of household.
 - Criteria for prioritising moves between temporary accommodation.
- 6.16 The criteria for prioritising placements inside the borough and within neighbouring boroughs are particularly significant as households not meeting these criteria could potentially be placed outside London. It is recognised that

such moves may be difficult for homeless families and must be managed very sensitively. Some homeless families will be particularly vulnerable and/or have strong links to Haringey or neighbouring boroughs. The proposed policy takes this into account and specifically, the draft Equalities Impact Assessment (EqIA, attached as appendix 3) assesses the impact of moving households outside London. This is described in section 8 below. The EqIA concludes that a support package for households placed outside London would help mitigate this impact.

6.17 Such a package has been developed and it is envisaged that it will include a range of practical support and assistance, including 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
- Utility connections (i.e. electricity/gas/phone/internet)
- Removals and storage of personal effects
- Obtaining new furniture and white goods
- Financial support to travel back to Haringey to see family and friends
- Identifying links to local support e.g. contact with community, voluntary, faith and other groups

A holistic view will need to be taken to ensure effective resettlement and the range and composition of the final support package and how it is delivered will be a key element of the planned consultation. Resident expectations will need to be carefully managed to ensure that the final package is appropriate, realistic and affordable

6.18 A consultation exercise is planned for those who may be affected by the new policy, including existing TA residents and new applicants. Key stakeholders will be closely involved, both as important consultees and as contributors to the consultation arrangements. This will include the Homelessness Core Group (who are working with the council on developing our homelessness strategy), Shelter and other homelessness/housing advice agencies that have a presence in the borough.

6.19 An eight week consultation is planned. It is important that the communication materials, and the interaction with consultees, are clear and engagement with residents regarding the need for the policy is realistic. A consultation questionnaire and pamphlet/flyer is being produced, setting out a summary of the policy, the criteria for prioritising placements inside/outside Haringey and the proposed mitigation measures, with a link to the full policy on line. This will be available in languages other than English. Consultation documents including an equalities feedback form will be sent to targeted TA residents that may be affected, with a covering letter setting out the reasons for the council's proposal to adopt the policy. In addition, drop in events to consult TA residents face to face will be held and meetings with partner and stakeholder homelessness organisations will be held. Exit interviews are planned with new applicants who

present themselves at Apex House. The consultation documents will also be available in full on the Council's website.

- 6.20 It is envisaged that when adopted the TA Placements Policy will provide a long term framework, however, it will need to be updated periodically. Placements under the final policy will be monitored and reviewed on an annual basis, including equalities monitoring to assess the impact on protected groups, particularly where households have been placed in neighbouring boroughs or outside London. The final policy, together with annual monitoring reports, will be made publicly available and published on the Council's website.
- 6.21 It is recommended that consultation on the TA Placements Policy is approved, to focus on the criteria for prioritising placements inside/outside Haringey and the outline support package set out in the policy. Cabinet should note that the EqIA and the policy itself will be finalised in the light of consultation, along with the arrangements for updating, publishing and monitoring the policy and the necessary budget provision which, at this stage, is envisaged will need to be contained within existing budgets and/or offset by savings in TA costs.

7. CONTRIBUTION TO STRATEGIC OUTCOMES

- 7.1 Priority 5 of the council's Corporate Plan 2015-18 is to:
Create homes and communities where people choose to live and are able to thrive.

The priority sets out objectives in relation to housing supply, improving the quality of housing, homelessness prevention and supporting residents to lead fulfilling lives.

- 7.2 The Council has published a draft Housing Strategy 2015 – 2020 which seeks to deliver the housing objectives in Haringey's Corporate Plan. The draft Housing Strategy has been subject to two phases of public consultation. A revised draft of the Housing Strategy is being prepared for adoption, that will take account of the consultation responses and the emerging changes in national housing policy. The draft Housing Strategy includes four objectives as follows:
- Achieve a step change in the number of new homes built
 - Improve help for those in housing crisis
 - Drive up the quality of housing for all residents
 - Ensure that housing delivers a clear social dividend
- 7.3 The strategy provides a broad strategic direction for housing in the borough, but delivery of its objectives will be achieved through a range of housing policies and delivery plans. The Supply Plan and Temporary Accommodation Placements Policy discussed in this report are two of these sub-strategies/policies and provide the detail to support achievement of the council's strategic outcomes.

8. STATUTORY OFFICERS COMMENTS (CHIEF FINANCE OFFICER (INCLUDING PROCUREMENT), ASSISTANT DIRECTOR OF CORPORATE GOVERNANCE, EQUALITIES)

Chief Finance Officer (including Procurement)

- 8.1 There has been a steady increase in the number of households in temporary accommodation in recent years as follows:-

Year End	Total Households
31 st March 2013	2831
31 st March 2014	2869
31 March 2015	3043
31 st March 2016	3180

During the same period, the availability of the less expensive stock, Private Sector Leasing has reduced, and placements have had to be made into more expensive nightly rated stock. The average cost per unit per week of Nightly rated stock is approximately £306 per week whereas Private Sector Leasing stock £260 per week giving a saving of £46 per week. The movement is as follows:-

Year End	Nightly Rated units	Private Sector Leasing units
31 st March 2013	828	1,290
31 st March 2014	1,028	1,219
31 March 2015	1,336	1,145
31 st March 2016	1,501	1,083

- 8.2 The opportunity to be able to safely place homelessness tenants in units that can be procured outside of the borough may have significant benefits. In terms of the Benefit Cap, even though the cap is set lower for outside of London, market rents tend to be much lower and are less likely to breach the Benefit Cap. This means that the cost that falls on the council is likely to be much lower in terms of rent arrears. The ability to procure outside of the borough and outside London will also increase supply and reduce the ability of private sector suppliers to demand high rents from the council when other councils are competing for the same limited supply.
- 8.5 It should be noted, however, that it cannot be assumed that all procurement of temporary accommodation outside of the borough will be cheaper for the council. The net cost to the council is the difference between what it pays for procurement and what it recovers in rent in terms of housing benefit subsidy. The level of housing benefit subsidy recoverable is determined by the Local Housing Allowance (LHA) for the area in which the accommodation falls. Generally, LHA levels outside of London are lower than those in Haringey and any future procurement activity should consider not just the rent levels payable to suppliers but also rent levels recoverable.
- 8.6 Paragraph 6.17 outlines various support measures that may be available to households placed outside of London. An estimate of the cost of these measures has not yet been presented and it is not clear whether these will be met from existing budgets or will be an additional cost and offset by the savings generated from the out-of-borough placement.

Assistant Director of Corporate Governance

- 8.7 The Assistant Director of Corporate Governance has been consulted in the preparation of this report and comments as follows.
- 8.8 Part VII of the Housing Act 1996 (“the Act”) imposes duties on the Council as a local housing authority to secure suitable temporary accommodation for the homeless while investigations are made into their entitlements and, subsequently if certain conditions are met.
- 8.9 The Homelessness (Suitability of Accommodation) (England) Order 2012 (“the 2012 Order”) and the accompanying Supplementary Guidance issued by the Secretary of State, confirms that the location of the accommodation – including, where the accommodation is out of the borough, its distance from the borough - is relevant to suitability of the accommodation secured. The 2012 Order also identifies a series of other matters related to location to which the authority must have regard in considering suitability of accommodation.
- 8.10 By s206 of the Act the council may discharge its housing functions by securing suitable (temporary) accommodation or securing suitable accommodation from another, and imposing a reasonable charge and by s208 of the Act the Council must, so far as practicable, secure temporary accommodation within its district.
- 8.11 The Supreme Court decision in the case of *Nzolameso v Westminster City Council* (“Nzolameso”) reiterates the need for local authorities to have proper regard to its statutory duties under ss206 and 208 of the Act. It emphasises that where “in-borough” accommodation cannot be secured, a local housing authority must secure accommodation as close to the borough as reasonably practicable (which may include considerations of cost to the authority) and be prepared to explain in any individual case why the specific accommodation that was offered was considered suitable having regard to the statutory duties. To this end the Supreme Court gives guidance to local authorities. It acknowledges that authorities will predict likely demand and recommends that:

“...Ideally, each local authority should have, and keep up to date, a policy for procuring sufficient units of temporary accommodation to meet the anticipated demand during the coming year. That policy should, of course, reflect the authority's statutory obligations under both the 1996 Act and the Children Act 2004...”

and:

“...Secondly, each local authority should have, and keep up to date, a policy for allocating those units to individual homeless households. Where there was an anticipated shortfall of “in borough” units, that policy would explain the factors which would be taken into account in offering households those units, the factors which would be taken into account in offering units close to home, and if there was a shortage of such units, the factors which would make it suitable to accommodate a household further away...”

both policies of course to be democratically approved and publicly available.

- 8.12 The policy at appendix 2 is intended to meet these recommendations and to provide the basis for decision-making as to individual cases.
- 8.13 The Supreme Court in the case of *Moseley v Haringey* has endorsed the following general principles of consultation:
- That consultation must be at a time when proposals are still at a formative stage;
 - That the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
 - That adequate time must be given for consideration and response; and
 - That the product of consultation must be conscientiously taken into account in finalising any statutory proposals.
- 8.14 In short, in order to achieve the necessary degree of fairness, the obligation is to let those who have a potential interest in the subject matter know in clear terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.

Equality

- 8.15 The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:
- Tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
 - advance equality of opportunity between people who share those protected characteristics and people who do not;
 - foster good relations between people who share those characteristics and people who do not.
- 8.16 The report seeks Cabinet approval for resident and stakeholder consultation on the proposed Temporary Accommodation Placements Policy attached as appendix 2 to this report. The policy provides guidance on the type and location of accommodation in which households can be placed, including the circumstances in which priority will be given to households for accommodation in the borough or in neighbouring boroughs. Those placed in temporary accommodation are amongst some of the borough's most vulnerable residents, including those that share the protected characteristics.
- 8.17 The Placements Policy criteria aim to ensure that the most vulnerable groups and those likely to be most disadvantaged by placement outside of London – such as those with care needs or households with exam age children – are given priority for in-borough and neighbouring borough placements. However, households that do not meet these criteria may be placed in temporary accommodation outside London. Some protected groups are therefore likely to

be disproportionately affected by the policy. Because lone female parents form a high proportion of the households living in temporary accommodation, it is likely that there will be a disproportionate impact on this group. The EqIA notes that there would be adverse impacts for these households, including isolation from support networks, separation from cultural and religious facilities and disruption in schooling for non exam age children.

- 8.18 Under the policy, placement outside of London would be a measure of last resort. However, in situations where placement out of London is unavoidable (e.g. due to the limited availability of affordable temporary accommodation) a clear package of support will be agreed to mitigate the impact for these households. Homes for Haringey has been commissioned to develop a package of support options, which may include assistance with the placement of children in local schools, assistance in registering with support agencies and subsidised travel back to the borough for set periods. It is intended to consult on the equalities aspects of the draft policy, including possible mitigation measures and support packages. The outcome of the consultation will inform the final package of support to be developed and the EqIA will be updated to reflect this.

9. USE OF APPENDICES

Appendix 1 – Summary of Supply/Demand Projections 2015/30
Appendix 2 – Draft Temporary Accommodation Placements Policy
Appendix 3 – Draft Equalities Impact Assessment

10. LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

Background papers:

Draft Housing Strategy 2015/20

Placements Scheme approved by Cabinet in October 2014 as revised by Cabinet Member decision in August 2015

Supply and Demand Projections

Demand	2015/16	2016/17	2017/18	2018/19	2019/20	2024/25	2029/30
Housing Register at the end of the year (March)	8,290	8,247	8,235	8,260	8,451	9,422	9,864
Estate Renewal rehousing requirements for the year	57	72	38	32	95	-	-
Total Demand	8,347	8,319	8,273	8,292	8,546	9,422	9,864

This table shows the total demand for permanent housing. This is comprised of households on the Housing Register and those households who are being re-housed as part of an Estate Renewal Scheme.

Supply	2015/16	2016/17	2017/18	2018/19	2019/20	2024/25	2029/30
Re-lets from existing Council and Housing Association stock	489	416	350	315	282	192	173
New Properties from Estate Renewal Schemes, New Build and acquisitions	6	133	200	148	152	125	267
Private Sector	65	200	250	326	316	328	343
Total Supply	560	749	800	789	750	645	783

This table shows the total supply of Permanent Housing. This is comprised of Re-lets from existing Council and Housing Association stock, New properties built on Estate Renewal Sites and smaller schemes, plus Private Sector lettings.

Shortfall	2015/16	2016/17	2017/18	2018/19	2019/20	2024/25	2029/30
Shortfall between demand and supply	7,787	7,570	7,473	7,503	7,796	8,777	9,081

This table shows the shortfall between total demand for and supply of Permanent Housing as set out in the tables above.

Temporary Accommodation Supply	2015/16	2016/17	2017/18	2018/19	2019/20	2024/25	2029/30
Supply of Temporary Accommodation in the borough or in neighbouring boroughs	3,164	2,940	2,674	2,559	2,555	2,744	2,690
Total Supply of Temporary Accommodation which will need to be sought out of London	-	50	176	191	197	206	220

This table shows the Supply of Temporary Accommodation in the borough or in neighbouring boroughs at the end of each year (March), and the supply which will need to be obtained outside London.

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Haringey Council**Draft 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 enquires 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*:**
- 4.3 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.

- 4.4 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.
- 4.5 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.
- 4.6 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.
- 4.7 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.
- 4.8 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.
- 4.9 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.

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

- 4.11 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.
- 4.12 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.
- 4.13 Any other special circumstance will be taken into account (including any particular needs of the children in the household not already identified).
- 4.14 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.

4.15 If placed outside London the council may offer assistance and support for a reasonable period. This will be judged on a case by case basis and may include help to find employment, child care, schools and a GP.

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.

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Equality Impact Assessment

Name of Project	Temporary Accommodation Placements Policy	Cabinet meeting date <i>If applicable</i>	4 th July 2016 Lead Member signing
Service area responsible	Housing Commissioning, Investment & Sites Service		
Name of completing officer	Nick Smith/Denise Gandy	Date EqIA created	21 March 2016
Approved by Director / Assistant Director	Dan Hawthorn	Date of approval	

The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to:

- tackle discrimination and victimisation of persons that share the characteristics protected under S4 of the Act. These include the characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation;
- advance equality of opportunity between people who share those protected characteristics and people who do not;
- foster good relations between people who share those characteristics and people who do not.

Haringey Council also has a '**Specific Duty**' to publish information about people affected by our policies and practices.

All assessments must be published on the Haringey equalities web pages. All Cabinet papers MUST include a link to the web page where this assessment will be published.

This Equality Impact Assessment provides evidence for meeting the Council’s commitment to equality and the responsibilities outlined above, for more information about the Councils commitment to equality; please visit the Council’s website.

Stage 1 – Names of those involved in preparing the EqIA		
1. Project Lead	Nick Smith/ Denise Gandy	5.
2. Equalities / HR	Kathryn Booth	6.
3. Legal Advisor	Robin Levett /Michelle Williams	7.
4. Trade unions		8.

Stage 2 - Description of proposal including the relevance of the proposal to the general equality duties and protected groups.

Members are being asked to approve the Temporary Accommodation Placements Policy and arrangements for annual monitoring of placements.

This report relates to the Council’s approach to meeting the housing needs of households in temporary accommodation, including those that share the protected characteristics. It is therefore of high relevance to the Council’s Equality Duty.

The Temporary Accommodation Placements Policy provides guidance on the placement of households in temporary accommodation. It highlights the process for decision-making on the type of accommodation and the location of

accommodation to meet interim placements and longer term placements. The policy notes that due to shortage of supply an increasing number of households are likely to be placed outside the borough, on the periphery of London and in some circumstances, further afield.

The policy outlines the circumstances in which priority will be given to households for accommodation in the borough or in neighbouring boroughs. These criteria are as follows:

Priority for in-borough accommodation will be given to:

- 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.
- 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.
- 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.
- 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.
- 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.
- 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.

- Any other special circumstance will also be taken into account (including any particular needs of the children in the household not already identified).

Priority for placements within neighbouring boroughs will be given to:

- 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.
- 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.
- Any other special circumstance will be taken into account.

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.

Stage 3 – Scoping Exercise - Employee data used in this Equality Impact Assessment

Data Source	What does this data include?
Not Applicable	The proposed Temporary Accommodation Placements Policy does not impact on Haringey Council employees (unless residents of the borough and are also homeless or likely to become homeless) and thus included below.

Stage 4 – Scoping Exercise - Service data used in this Equality Impact Assessment

Individuals and Households

An assessment based on households captures only the characteristics of the head of household. As members of the household will have different characteristics, the following analysis has been made on all the individuals living in temporary accommodation rather than the head of the household. This has allowed inclusion of partners and children into the assessment. However, it should be noted that family units have been used for the analysis of family structure in the gender section.

Data used in this Analysis

This Equalities Impact Assessment has used available data to assess individuals who were living in temporary accommodation on 29 February 2016.

Assessment of work status

One priority for placement in neighbouring boroughs is based on the work status of each member within a household, and to assess a household against this criteria, full work status is needed for each working age adult within that household.

From the sources available, full work status data was held on 2,102 households and only partial or no work status on the remaining 1,070 households. The working hours priority could therefore only be completed on 2,102 households. The analysis has thus been applied to the cohort of 6,758 individuals who live within these 2,102 assessable households.

This cohort represents 61.5% of all individuals living in temporary accommodation and has a similar gender, age and ethnicity profile as the whole population of temporary accommodation. These profile comparisons are shown in the following tables.

Gender	All individuals living in temporary accommodation	Individuals within the Cohort
Female	6,280 57.7%	3,953 58.5%
Male	4,611 42.3%	2,805 41.5%
Total	10,891	6,758

Age	All individuals living in temporary accommodation	Individuals within the Cohort
0-16	5,268 48.4%	3,422 50.6%
16-24	1,506 13.8%	790 11.7%
25-34	1,540 14.1%	1,015 15.0%
35-44	1,505 13.8%	954 14.1%
45-54	842 7.7%	464 6.9%
55-64	175 1.6%	84 1.2%
65+	40 0.4%	21 0.3%
Not Known	15 0.1%	8 0.1%

Ethnicity	All individuals living in temporary accommodation	Individuals within the Cohort
Asian	756 6.9%	419 6.2%
Black	3,796 34.9%	2,446 36.2%
Chinese or Other Ethnic Group	1,422 13.1%	871 12.9%
Mixed	396 3.6%	304 4.5%
Not known	1,303 12.0%	708 10.5%
White	3,218 29.5%	2,010 29.7%
Total	10,891	6,758

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Assessment of education status and examinations

To assess if a member of the household is enrolled in GCSE, AS or A level courses and taking exams within the academic year, it has been assumed that all children aged 15 at 1 September 2015 will be taking GCSEs. It is also been assumed that those aged 16 or 17 on 1 September 2015 and recorded as being 'in school' or 'full time education' will be taking GCSEs, AS or A' Levels or their equivalent. Anyone over 18 on 1 September 2015 is taken as an adult and therefore would not meet the priority criteria.

It is accepted that some children taking A 'levels may not be recorded as "in school" and so not included in the assessment, but also that some 17 & 18 years olds recorded as 'in school' or in 'full time education' may have left studies and/or may not be taking exams in the current academic year.

Data Source	What does this data include?
EqIA Profile on Harinet	Age, gender, ethnicity, disability information – for the Council and the Borough
Internal Crystal report: HW0116 Households in Temporary Accommodation	Date of Birth and ethnicity of all individuals in temporary accommodation, including family members. Taken 29 February 2016 Cross referenced with reports HW0137 & TA0181 below

<p>Internal Crystal report: HW0137 Single Vulnerable Adults</p>	<p>Vulnerabilities in Single Households in temporary accommodation, including Pregnancy, Physical & Mental Health, Learning Difficulties, Ex-offenders, Substance Misuse, 16/17 year olds and Leaving care. Cross referenced with reports HW0116 above & HW0137 below.</p>
<p>Internal Crystal report: TA0181 Households in Temporary Accommodation</p>	<p>Nationality, Family Structure & Housing Benefit and Net Rent, of Homeless Households in Temporary Accommodation over the previous 6 months, as of 29 February 2016. Cross referenced with reports HW0116 & HW0137 above.</p>
<p>ONS LC3304EW - Provision of unpaid care by age (Census 2011) <u>ONS LC3304EW</u></p>	<p>Provision of Unpaid Care by age and borough</p>

Stage 5a – Considering the above information, what impact will this proposal have on the following groups in terms of impact on residents and service delivery:

	Positive	Negative	Details	None – why?															
Gender		✓	<p>In comparison to all individuals within the cohort, there is a higher percentage of females who would not meet the priority to remain in the borough or in neighbouring boroughs. These comparisons include all individuals in the cohort including children.</p> <table border="1"> <thead> <tr> <th colspan="3">Individuals in Cohort</th> </tr> <tr> <th>Gender (Individuals)</th> <th>All individuals within the cohort</th> <th>Individuals in cohort with no priority</th> </tr> </thead> <tbody> <tr> <td>Female</td> <td>3,953 58.5%</td> <td>1,490 62.4%</td> </tr> <tr> <td>Male</td> <td>2,805 41.5%</td> <td>898 37.6%</td> </tr> <tr> <td>Total</td> <td>6,758</td> <td>2,388</td> </tr> </tbody> </table>	Individuals in Cohort			Gender (Individuals)	All individuals within the cohort	Individuals in cohort with no priority	Female	3,953 58.5%	1,490 62.4%	Male	2,805 41.5%	898 37.6%	Total	6,758	2,388	
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	Positive	Negative	Details			None – why?
				2.8%	2.2%	
			Lone female with dependant children	1,319 62.7%	636 77.9%	
			Lone male	49 2.3%	15 1.8%	
			Lone male with dependant children	82 3.9%	28 3.4%	
			Other	388 18%	78 10%	
			Total	2,102	816	
			<p>Lone parent families are more likely to have informal support in the local area, and may also find it more difficult to return to the borough for medical, schooling and other reasons due to child care commitments. This may also affect the continuity of schooling for children who are not taking GCSE, A/O or A' Levels.</p>			
Gender Reassignment			<p>Information on gender reassignment is not available in relation to the proportion of households presenting as homeless, accessing temporary accommodation or on the council's housing register. However, the Temporary Accommodation Placements Policy is not anticipated to have a disproportionate impact on this protected group.</p>			✓

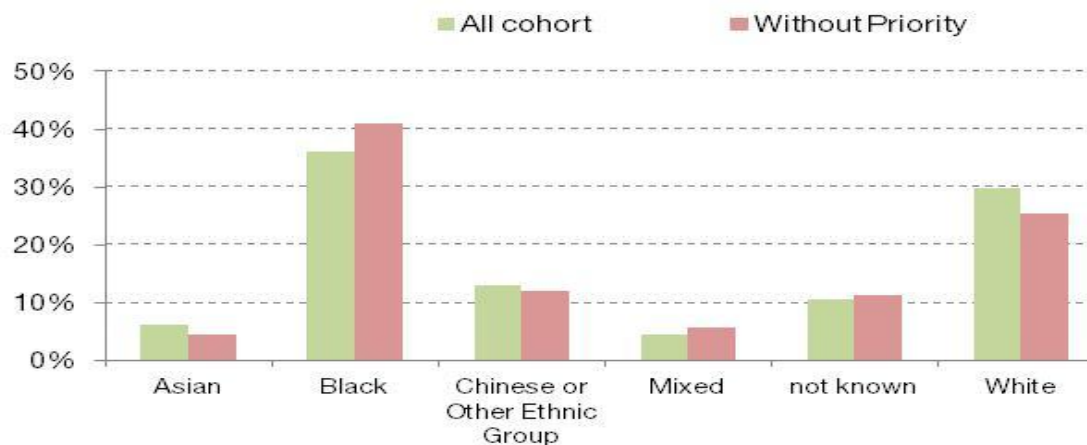
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Age		✓	<p>Children under 16 make up 48.4% of individuals in Temporary Accommodation and 50.6% of those in the cohort. The Placements policy will therefore affect this age group and the percentage of those aged under 16 (55.9%) is significantly higher in those who would not be given priority. There is also a small difference in those individuals aged between 25 to 34 who will not be given priority (15.0%) compared with the cohort (16.7%).</p> <p>This increase is in contrast to the lower percentages of those aged 35-44 and 45-54 who together represent 8.1% of the Sample and 5.2% of those not given priority.</p> <table border="1"> <thead> <tr> <th colspan="3">Individuals in cohort</th> </tr> <tr> <th>Age Groups (individuals)</th> <th>All individuals within the cohort</th> <th>Individuals in cohort with no priority</th> </tr> </thead> <tbody> <tr> <td>0-16</td> <td>3,422 50.6%</td> <td>1,335 55.9%</td> </tr> <tr> <td>16-24</td> <td>790 11.7%</td> <td>228 9.5%</td> </tr> <tr> <td>25-34</td> <td>1,015 15.0%</td> <td>399 16.7%</td> </tr> <tr> <td>35-44</td> <td>954 14.1%</td> <td>298 12.5%</td> </tr> <tr> <td>45-54</td> <td>464 6.9%</td> <td>105 4.4%</td> </tr> </tbody> </table>	Individuals in cohort			Age Groups (individuals)	All individuals within the cohort	Individuals in cohort with no priority	0-16	3,422 50.6%	1,335 55.9%	16-24	790 11.7%	228 9.5%	25-34	1,015 15.0%	399 16.7%	35-44	954 14.1%	298 12.5%	45-54	464 6.9%	105 4.4%	
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			<p>The bar chart shows the percentage of individuals in each age group for two categories: 'All cohort' (green bars) and 'Without Priority' (red bars). The y-axis represents percentages from 0% to 60% in 10% increments. The x-axis lists age groups: 0-16, 16-24, 25-34, 35-44, 45-54, 55-64, and 65+.</p> <table border="1"> <caption>Age Group Data from Chart</caption> <thead> <tr> <th>Age Group</th> <th>All cohort (%)</th> <th>Without Priority (%)</th> </tr> </thead> <tbody> <tr> <td>0-16</td> <td>~50%</td> <td>~55%</td> </tr> <tr> <td>16-24</td> <td>~12%</td> <td>~10%</td> </tr> <tr> <td>25-34</td> <td>~15%</td> <td>~18%</td> </tr> <tr> <td>35-44</td> <td>~14%</td> <td>~13%</td> </tr> <tr> <td>45-54</td> <td>~8%</td> <td>~5%</td> </tr> <tr> <td>55-64</td> <td>~2%</td> <td>~1%</td> </tr> <tr> <td>65+</td> <td>~0%</td> <td>~0%</td> </tr> </tbody> </table>				Age Group	All cohort (%)	Without Priority (%)	0-16	~50%	~55%	16-24	~12%	~10%	25-34	~15%	~18%	35-44	~14%	~13%	45-54	~8%	~5%	55-64	~2%	~1%	65+	~0%	~0%	
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			<p>It is also noted that those aged 45 and 65 typically provide significantly higher levels of unpaid care which has not been taken into account in this assessment due to the limited records available. From the census 2011, 5.0% of households aged 25 to 34 year olds provide unpaid care, compared with 9.8% for those aged 35 to 49.</p>																												

	Positive	Negative	Details	None – why?									
Disability		✓	<p>The Temporary Accommodation Placements Policy is not expected to adversely affect those with severe disabilities as the policy sets out a priority to remain in the borough for those with severe and enduring health conditions and mental health problems where treatment or care outside of borough would be detrimental to their health or wellbeing. Priority is also given to households containing a child with SEN (Special Educational Needs) receiving education or support in Haringey.</p> <p>The policy does allow some disabled people with low level support needs to be moved. However, individual assessments will seek to determine if moves unduly affect each household and to consider any issues raised.</p>	✓									
Race & Ethnicity		✓	<p>For most ethnicities, the proportion of individuals who would not be given priority is broadly similar to the proportion of all individuals within the cohort. However, there is a higher percentage of those with a Black ethnicity who would not be given priority (41.1% compared with 36.2%) and a correspondingly lower percentage of those with a White Ethnicity (25.4% not given priority compared with 29.7% of the cohort). These comparisons include all individuals in the cohort including children.</p> <table border="1"> <thead> <tr> <th colspan="3">Individuals in cohort</th> </tr> <tr> <th>Ethnicity</th> <th>All individuals within the cohort</th> <th>Individuals in cohort with no priority</th> </tr> </thead> <tbody> <tr> <td>Asian</td> <td>419 6.2%</td> <td>105 4.4%</td> </tr> </tbody> </table>	Individuals in cohort			Ethnicity	All individuals within the cohort	Individuals in cohort with no priority	Asian	419 6.2%	105 4.4%	
Individuals in cohort													
Ethnicity	All individuals within the cohort	Individuals in cohort with no priority											
Asian	419 6.2%	105 4.4%											

	Positive	Negative	Details		None - why?
			Black	2,446 36.2%	981 41.1%
			Chinese or Other Ethnic Group	871 12.9%	289 12.1%
			Mixed	304 4.5%	136 5.7%
			not known	708 10.5%	270 11.3%
			White	2,010 29.7%	607 25.4%
			Total	6,758	2,388

Ethnicity



Placement out of London may have an adverse affect on access to cultural facilities and links to established communities.

	Positive	Negative	Details	None – why?									
Sexual Orientation			Information on sexual orientation is not available in relation to the proportion of households in temporary accommodation. However, the Temporary Accommodation Placements Policy is not anticipated to have a disproportionate impact on this protected group.	✓									
Religion or Belief (or No Belief)			Information on religion is not available for those in temporary accommodation and only partially for those on estates. However, it is noted that for those in temporary accommodation who may be moved out of the borough, distance to appropriate religious institutions and should be taken into account when assessing each client.	✓									
Pregnancy & Maternity		✓	<p>The Placements Policy gives priority to those who are on maternity leave and so those on maternity leave will be excluded. It is also noted that on 29 February 2016 there were only 20 pregnant women living in Temporary Accommodation and 18 in the cohort. Of these, 9 pregnant women who would not be given priority for other reasons.</p> <table border="1"> <thead> <tr> <th colspan="3">Individuals in Cohort</th> </tr> <tr> <th>Pregnancy</th> <th>All individuals within the cohort</th> <th>Individuals in cohort with no priority</th> </tr> </thead> <tbody> <tr> <td>Total</td> <td>18</td> <td>9</td> </tr> </tbody> </table> <p>It is noted that new parents are likely to need higher support levels should be taken into account when assessing each client.</p>	Individuals in Cohort			Pregnancy	All individuals within the cohort	Individuals in cohort with no priority	Total	18	9	
Individuals in Cohort													
Pregnancy	All individuals within the cohort	Individuals in cohort with no priority											
Total	18	9											

	Positive	Negative	Details	None – why?
Marriage and Civil Partnership (note this only applies in relation to eliminating unlawful discrimination (limb 1))			There is no information for individuals in temporary accommodation on their marriage/civil partnership status. However, it is noted that single parent households will be affected and may have greater need of local support networks, which should be taken into account when assessing each client.	✓

Stage 5b – For your employees and considering the above information, what impact will this proposal have on the following groups:

Positive and negative impacts identified will need to form part of your action plan.

	Positive	Negative	Details	None – why?
Sex	Not applicable	Not applicable	Not applicable	The proposals will not impact on staff
Gender Reassignment	As above	As above	As above	As above
Age	As above	As above	As above	As above
Disability	As above	As above	As above	As above
Race & Ethnicity	As above	As above	As above	As above
Sexual Orientation	As above	As above	As above	As above
Religion or Belief (or No Belief)	As above	As above	As above	As above
Pregnancy & Maternity	As above	As above	As above	As above
Marriage and Civil Partnership <i>(note this only applies in relation to eliminating unlawful discrimination (limb 1))</i>	As above	As above	As above	As above

Stage 6 - Initial Impact analysis

Actions to mitigate, advance equality or fill gaps in information

The Council will, wherever possible, seek to acquire affordable temporary accommodation within the borough and in neighbouring boroughs. However, where there is insufficient affordable temporary accommodation, placing families in borough may cause them excessive financial hardship. Where sufficient affordable temporary accommodation is not available the Council will have to seek alternative accommodation further afield.

The Placements Policy criteria will ensure that the most vulnerable groups – such as those with care needs - are given priority for in-borough and neighbouring borough placements. However, the EqlA notes that some protected groups may be disproportionately affected by the policy.

Lone female households with dependent children will be particularly affected as they represent 77.9%% of all households who won't meet the priority. This is household breakdown is also reflected in the Age profile with those under 16 representing 55.9% of individuals not being given priority.

TO BE REVIEWED AFTER CONSULTATION

Haringey Council prioritises households according to vulnerability. However, where placements need to be made out of borough, a range of services and options are being developed to support these households.

Haringey Council will be consulting on the Temporary Accommodation Placements Policy, and possible mitigation measures will form a key part of this consultation.

The Consultation

The consultation will run for eight weeks from 13th July and ending on 7th September 2016. A questionnaire and pamphlet/flyer will be sent to all residents who may be affected setting out a summary of the main provisions of the draft policy, with a link to the full policy on line. Exit interviews with new applicants who present themselves at Apex House and Station Road will take place to find out their views on the draft policy

The consultation documents will be available in full on the Council's website and will include an equalities feedback form and a covering letter setting out the reasons for the council's proposal to adopt the policy.

Out of borough placements may have a negative impact for certain protected groups, for example, disruption to schooling for families with dependent children, separation from cultural and religious facilities which may have a larger effect on smaller communities, and loss of local support networks.

In addition, the Council will run drop in events to consult residents of Temporary Accommodation face to face and meetings with partners and homelessness organisations.

Mitigations

Following consultation, Homes for Haringey will be commissioned to develop a package of support. It is envisaged that the package will include a range of practical support and assistance, including help with:

- Help finding employment in new area
- Help finding child care
- Help finding a school for children in the new area
- Help finding a local GP or other medical assistance
- Removals and storage of items
- Reconnections (e.g. electricity /gas / phone / internet)
- Financial support to travel back to Haringey to see family and friends
- Help to arrange getting set up with things like Council Tax, getting set up with local support (formal social work or informal).
- Help finding local community groups / religious groups

The outcomes of an approved Temporary Accommodation Placements Policy will be monitored on an annual basis and will include an assessment of the impact on the protected groups. This

annual appraisal will give particular attention to those households who have been placed in accommodation in neighbouring boroughs and, exceptionally, out of London. The policy and the annual monitoring reports will be publically available.

Stage 7 - Consultation and follow up data from actions set above

Data Source (include link where published)	What does this data include?
Consultation on the Temporary Accommodation Placements Policy will commence on 13 th July and end on 7 th September 2016.	

Stage 8 - Final impact analysis

The EqIA notes that there would be adverse impacts for these households including isolation from support networks and disruption in schooling for children who are not taking GCSE, A/O or A' Level exams. Under the proposed Temporary Accommodation Procurement Policy, placement outside of London would be a measure of last resort. However, in situations where placement out of London is unavoidable due to the limited availability of affordable temporary accommodation and placement in London could cause a family unacceptable financial hardship, a clear package of support will be agreed to mitigate the impact for these households.

The EqIA will be updated annually in line with the equalities monitoring for these policies and as set out above.

Stage 9 - Equality Impact Assessment Review Log

Review approved by Director / Assistant Director

Date of review

Review approved by Director / Assistant Director

Date of review

Stage 10 – Publication

Ensure the completed EqIA is published in accordance with the Council’s policy.