



**Scrutiny Review: Temporary Accommodation (TA)
Placements Policy and Private Rented Sector (PRS)
Discharge Policy.**

**A Scrutiny Review by the Housing, Planning & Development
Scrutiny Panel
2024/25**

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	Cllr Tammy Hymas
	Cllr Holly Harrison Mullane
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1. Chair's Foreword

All councils in London, and increasingly across the UK, are grappling with a Temporary Accommodation crisis that is devastating lives and contributing to the immense financial pressures faced by local government. We feel this intensely in Haringey, where approximately 2700 people are currently living in Temporary Accommodation and over 14 thousand people are on the housing register waiting for a permanent placement.

We know that due to severe shortages of appropriate, affordable housing options, and the knock-on effects of the wider housing and homelessness crises, some of those currently living in Temporary Accommodation in Haringey are in situations that do not meet their needs in the way we would ideally want. This is despite genuine well-intentioned best efforts of the Housing Service, who are carrying out their important work in extremely difficult circumstances. The number of people owed a statutory housing duty by the council who are on the waiting list for TA far outstrips the number of homes available in the borough. Although we are heavily constrained by national policy issues, who the Council prioritises for the TA we do have locally, who it considers for placements in the private rented sector, which types and where, are impactful decisions in the council's power.

Because the council is currently looking to update its Temporary Accommodation (TA) Placements Policy and Private Rented Sector (PRS) Discharge Policy, this was felt to be an impactful area that the Housing Scrutiny Panel could look at to try and support positive change. Our initial hope was to be able to advise the Cabinet on how best to prioritise different groups for the different types of TA available, and what criteria to use to inform those decisions. However, we received limited evidence on this from external experts, and our focus shifted in response. We heard compelling evidence about affordability challenges, the disproportionate impacts of inappropriate TA on minoritised groups and/or households with additional vulnerabilities, the standard and quality of TA, the additional considerations needed when considering placing a household out of borough, how best to support those placed in TA, and the national policy changes needed to alleviate the financial pressures on councils.

As such, our recommendations focus more on how the council could make improvements to its approach to TA more broadly, and provide more oversight and support, although several of our asks will be in scope of the new updated policies. We do hope that Officers and Cabinet will consider our findings as part of their wider research and engagement around the new policies, and adopt our recommendations.

I'd like to thank all members of the Housing Scrutiny Panel who contributed to the review for their time and engagement, in addition to Cllr Dunstall for his contribution to the review. I'd also like to sincerely thank the council officers, the Cabinet Member for Housing, and the external experts we spoke to, for sharing their thoughts and expertise and contributing massively to our understanding.

Cllr Alexandra Worrell, Chair Housing, Planning and Development

2. Recommendations

Affordability

1. That Cabinet lobby the government to: a) Change the TA subsidy rates and move them up to match the current market prices. The rates are stuck at January 2011 rates and LAs are incurring significant debts because government hasn't uplifted the rates; b) Move the Local Housing Allowance rates up to the 50th percentile (rather than 30%) and ensure they are up-rated annually.
2. That the Council strengthens its representations to the Mayor of London and the government around the need to agree and enforce a framework of pan-London TA rent levels, in order to prevent London boroughs competing with each other and driving up prices.
3. That the Council makes it its policy to challenge housing associations if and when they refuse to place someone on the grounds of affordability.

Equalities monitoring

4. That Cabinet commit to undertake equalities monitoring for households in temporary accommodation. This monitoring should include the ethnicity of households in temporary accommodation, the ethnicity of households who are placed out of borough and the length of time households are in TA. This is a reflection of concerns that there is a national disproportionality around ethnicity and temporary accommodation. The council should consider its monitoring evidence and whether it needs to address unconscious bias in its own decision-making.

Choice

5. That Cabinet explore ways it can try to build in a degree of choice and agency into the process of determining how and where somebody is placed. The Council also needs to provide clear communications to residents about how long they may be in TA, as well as what the possible options are in relation to being placed out of borough. The Panel supports the idea of there being an offer available to families who are happy to be placed out of borough, and that they are supported through the process.

Domestic Abuse

6. That the policy in relation to how DA survivors should be prioritised should be updated in line with latest best practice, including by removing the stipulation in the PRSO policy that police evidence needs to be provided, and by setting out that survivors may be prioritised either for in-borough/local placements OR a placement further away from the perpetrator, depending on the circumstances of the case and the survivor's wishes.

Out of Borough Placements

7. The Panel understands the rationale in seeking to provide more out of borough accommodation, but requests assurances from Cabinet that the Council will still be doing everything it can to secure in-borough accommodation and that discharging people into the PRS out of the local area will be a last resort. The Panel is concerned about the national knock-on effects from London Boroughs placing large numbers of people in places with comparatively cheaper rent costs.
8. The Panel are concerned with the possible impact on community cohesion if London Boroughs start placing large numbers of people into the PRS outside of London. The Council should ensure that a risk assessment is conducted when placing families out of borough, which takes into account possible community tensions and whether they can effectively be mitigated.
9. The Council should model best practice by communicating with the local authority they are placing a household in, if placing out-of-borough, and request that the household is supported to arrange primary school placements, access to GP surgeries and any other local services that may be of use to them. Haringey should also provide this for any households placed in Haringey by other councils.

Supporting those in TA

10. The Cabinet consider setting up a dedicated fund, that people in TA are eligible for, in order to help them meet the additional costs and difficulties caused by being in TA, particularly when placed away from the borough. The financial support should be tiered to the type of accommodation they have been placed in and whether they have access to cooking and laundry facilities, for example. If someone is placed in a different part of the country, they will require support with relocation costs.
11. In addition to a dedicated fund, there should also be a dedicated TA support officer(s) to provide updates on a person's case, ensure that people receive any financial support through the proposed TA support fund, and also to ensure there is dedicated resource available for those applying for TA to contact. It is suggested that there should be an in-person offer available for residents who may be digitally excluded.

Quality and Inspection regime

12. That the Council ensures there is a robust inspection regime to ensure that accommodation is up to standard. If the number of people being placed out of borough is to increase, then the Council will need processes in place for inspecting accommodation that is outside of the local area. It is anticipated that this will require additional staffing resources.

13. The Council should also maintain a register of reputable landlords and managing agents, and their contact details, that we are willing to work with when discharging people into the PRS. This is linked to the inspection regime above.

3. Background to the Review, Terms of Reference & Membership

- 3.1 As part of the work planning process for Overview & Scrutiny in 2024/25 & 2025/26, an online scrutiny survey as well as an in-person Scrutiny Café event were held, in order to engage with the local community and resident groups, and to seek their views about which areas Scrutiny should focus its attention on over a two year period. As part of the feedback relevant to the Housing, Planning and Development Panel, one of the areas of most concern was Temporary Accommodation and a lack of available social housing more generally. A number of the comments received related to the length of time that families had to wait for a housing placement.
- 3.2 At the Housing, Planning & Development Scrutiny Panel meeting on 26th September 2024, the Panel received an update on the upcoming housing strategy and policy programme. During the meeting it was discussed that the Temporary Accommodation (TA) Allocations and Private Rented Sector (PRS) Discharge policies were due to be revised in the near future. The policies had last been updated in 2016 and 2011 respectively. Since 2016 the level of demand and complexity of demand for local housing has changed significantly and a revised policy is needed to determine how different people or groups will be prioritised for Temporary Accommodation. Depending on a specific household's progress through the system, this could be an interim/emergency placement, or a longer term placement made once the main housing duty is accepted. Who the Council prioritises for a longer term placement is an important decision, given the number of people on the waiting list for non-emergency placements far outstrips the number of homes available. In light of this, it was felt that a review on this subject was timely and provided the Panel with an opportunity to influence the revised policies as they were in development, and to contribute to improved outcomes for residents.
- 3.3 The TA allocation or placement policy sets out how the organisation prioritises different types of households for local housing placements (and by extension which groups are not going to be prioritised). A key consideration for a placement policy is who should be prioritised for a limited supply of in-borough housing, and in what circumstances should a household be placed outside of the local area. The PRS discharge policy relates to how the Council prioritises placing someone in an arrangement with a private sector landlord in order to discharge the Council's homelessness duty to that person. The two policies are currently separate but they could be combined into a single policy. The criteria used to prioritise someone for TA are fairly similar to how to prioritise someone for a PRS placement.
- 3.4 There are many issues within the Council's use of TA that are of interest and concern, including how long people spend in TA, the quality of the accommodation, and how best to maximise our supply of the least harmful forms of TA. However, in order to make best use of a time-limited scrutiny review and to try to have a tangible impact, given that the policies are due for renewal, it was agreed to keep this review as focused as possible on the TA Placement policy and PRS Discharge policy. The Council has a limited amount of local housing stock for use as TA and the scrutiny panel believes it is

important that the Council prioritises certain groups who may have additional needs, or else have a good reason for being prioritised, to remain within Haringey. It is also notable that demand for social housing far outstrips supply in Haringey and that the majority of people who apply for it, may never get a permanent placement.

- 3.5 The Overview & Scrutiny Committee agreed the terms of reference for the Scrutiny Review on 6th March 2025. Evidence gathering for the review took place between March and May 2025. Our starting point was to speak to the Housing Service to get a better understanding of the existing policies and which groups were currently prioritised in Haringey. We also spoke to the Cabinet Member for Housing & Planning and a number of external witnesses including; a migrant advocacy group, Shelter, an academic from the Institute for Social Policy, Housing, Equalities Research at Heriot Watt University, and a private housing consultant with links to government.
- 3.6 A full list of all those who provided evidence is attached as Appendix A.
- 3.7 At the beginning of the review we had a number of initial lines of questioning that we wanted to explore. These developed as the review progressed. However, they are instructive in terms of what we set out to ascertain with the review:
- Who should be prioritised for the different types of TA available? (Both in terms of its type e.g. Bed and Breakfast (B&B), nightly paid, and its location e.g. in borough, in London, outside of London?)
 - What criteria should be used to decide where someone falls in the prioritisation?
 - Who will be protected from certain types of accommodation?
 - Who should be prioritised for placements into the PRS? Who is this not appropriate for?
 - How much choice should/can households feasibly have?
 - To what extent should the choices made reflect the financial pressures facing the Council?

Terms of Reference

- 3.8 To review the TA Allocations Policy and the PRS Discharge Policy and make recommendations for how these could be improved. In particular, the Panel want to understand what criteria should be used to decide when someone is given priority and how can the process of allocating someone a placement be made fairer.
- 3.9 The Membership of the Panel was as follows:
2024-2025
Councillors Alexandra Worrell, Dawn Barnes, Isidoros Diakides, Holly Harrison-Mullane, Tammy Hymas, Khaled Moyeed and John Bevan.

Cllr Dunstall was also invited to take part in the review, given his professional experience as CEO of local homelessness charity.

Councillors Adam Small, Dawn Barnes, Isidoros Diakides, Holly Harrison-Mullane, Lestor Buxton, Khaled Moyeed and John Bevan.

4. Background Information on TA Placements on Discharging People into the PRS in order to discharge the Council's homelessness duty towards them.

- 4.1. Section 188 of the Housing Act 1996 (Part VII) requires a local authority to provide emergency accommodation where it has reason to believe that a person is eligible for assistance, homeless and in priority need. This covers an interim placement made by the local authority while homelessness enquiries are undertaken. Priority need is one of the key tests which determines whether a person is entitled to emergency or longer term accommodation. A person is classed as having priority need most commonly if they have children or are pregnant, or if they are otherwise vulnerable (for example old age, having a physical or mental disability or having spent time in care) or they are fleeing domestic abuse. A local authority needs to be satisfied that a person has a priority need in order to determine whether they owe that person a main housing duty.
- 4.2 Emergency accommodation usually needs to be sourced at very short notice and is often nightly paid self-contained accommodation (54% of TA placements in Haringey), a homelessness hotel (which provides kitchen facilities), a commercial hotel or a placement in one of three Council lodges (families only). Commercial hotels are used as a last resort and are seen as the least suitable types of placements as they are usually one room and lack cooking or laundry facilities. In order to comply with the Homelessness (Suitability of Accommodation) Orders of 2003 and 2012, the Council has a six week maximum period for placing a family with children in a setting with shared facilities (e.g. B&Bs). After the six weeks the family should be moved to alternative accommodation that doesn't have shared facilities. Due to the pressures on TA, the Panel were advised that the Council does not always meet this six-week target.
- 4.3 Section 191 of Housing Act 1996 sets out when a homeless person is considered to have become homeless due to something they have done or failed to do. This is known as being 'intentionally homeless'. Often a decision that someone is intentionally homeless arises when they turn down accommodation they have been offered. In Haringey, applicants are usually only given one offer of suitable interim (S.188) or longer term TA. If the applicant refuses an offer they will be asked to provide reasons. If the Council doesn't not accept their reasons for refusal as being valid, and considers the offer is suitable, applicants will not be offered further accommodation and the Council will discharge its homelessness duty on the basis that they are 'intentionally homeless'.
- 4.4 Section 193 of the Housing Act 1996 covers the main housing duty. A local authority owes this when someone is eligible for assistance, homeless, in priority need and not intentionally homeless. A local authority must provide temporary accommodation to someone owed the main housing duty until it can make an offer of longer term accommodation. A decision under Section

193 is effectively a longer term placement into temporary accommodation, following the interim emergency placement, and once a determination has been made that the local authority owes that household a main housing duty. The majority of longer term placements are also nightly paid accommodation, but it also includes properties leased to the Council by private landlords for provision of TA, as well as general needs Council properties that are being used for TA. There are approximately 2700 people in Temporary accommodation in Haringey and around 14.2k people on the housing register for a permanent placement.¹

- 4.5 The main housing duty can only be ended in a number of specified ways as set out in S193. This includes accepting or refusing a 'final offer' of accommodation, typically social housing or private rented accommodation, or refusing an offer of suitable temporary accommodation.
- 4.6 Under Haringey's existing TA Placements Policy, there is no right of internal review against the suitability of accommodation offered to applicants under S.188 (applicants must seek judicial review through the courts). Where the Council has accepted a main housing duty under S.193 there is a right to request an internal review of the suitability of that accommodation. The person would not necessarily be accommodated during the review, a decision would be made, on an exceptional basis, based on the merits of the review request and personal circumstances of the applicant.
- 4.7 Section 199 of the Housing Act 1996 covers when an applicant is considered to have a local connection to a local authority area. The Local Authority Agreement gives guidance that this is when someone has lived in an area for six of the last twelve months or three of the last five years, is employed there, or has close family there. A person might also have a local connection for other reasons. If a person does not have a local connection to the area they have applied to, that local authority can refer them to another local authority where they do have a local connection. The Panel notes that in some cases this can lead applicants to being bounced around from one authority to another.

Existing TA Placements Policy

- 4.8 The current policy effectively groups households into three groups; priority for a placement in borough, priority for a neighbouring borough, no priority for either a placement in Haringey or a neighbouring borough. The policy considers a number of factors for prioritisation: Children with SEND; critical school ages; households with children on the Child Protection Register; severe health where transfer would be disruptive; and care needs where move would result in social care burden. The existing policy sets out that accommodation must provide adequate space and room standards for the household and that it be fit to inhabit. Households in TA are often placed in units with one bedroom less than they would be entitled to on a permanent basis, with the expectation being the living room would double up as a living and sleeping area.
- 4.9 The current policy allows placements to be made to neighbouring boroughs and

¹ Figures accurate as of June 2025

to outside of London in adjoining counties i.e. Hertfordshire and Essex. As of 31 January 2025, 48% of placements were in Haringey, 51% were in London, and 1% were placed out of London. As part of the evidence the Panel received, it was acknowledged that in order to increase the number of available units of TA, it would be necessary in future to increase the numbers of people who were placed outside of Haringey, and outside of London.

Existing PRS Discharge Policy

- 4.10 The current PRS Discharge Policy sets out the order in which households will be prioritised for an offer of housing in the private rented sector, based on three priority bands which are determined by the severity with which they experience factors such as: Medical or welfare needs; SEND; safeguarding concerns; domestic abuse/harassment; acute disrepair; those with children living in shared facility accommodation; or under occupation/occupation of a specially adapted property they do not need. The policy also lists severe overcrowding as a factor (priority band two), as well as those where either the landlord has a possession order, or else the landlord wants the property back (priority band two and three respectively).
- 4.11 The existing PRS policy also sets out the criteria for prioritising placements in the borough and these broadly correspond the criteria used in the TA Placements policy outlined in Paragraph 4.6. In contrast to the TA Placements policy, the existing PRS policy limits PRS placements to Haringey and neighbouring boroughs. Officers from the Housing Service advised the Panel that placing people out of borough may need to be considered when the policy is updated, due to the levels of demand and the limited supply of properties either in Haringey or nearby. The policy also sets out that any property offered has to be affordable, and it clarifies that in reality this means that most cases would have to be within the Local Housing Allowance rate, given that most of the households in TA will be in receipt of Housing Benefit. This limits the availability of suitable properties in the private rented sector, particularly in Haringey and across London, where market rents are well above the LHA rate. The Panel supports the Housing Service in their aim of finding ways to support people to take up a PRSO outside of London in the future, provided that the household wants to move out by choice.

Evidence Gathering

5. Affordability

- 5.1 The Panel received evidence that the need for a property to be affordable is clearly set out in law, and that this applies to both temporary placements and more permanent placements, in order to meet the parameters of what is deemed a suitable offer. A local authority is expected to undertake an assessment of expenditure and income for any given property that may be offered. The Panel received evidence that the latest homelessness code of guidance for local authorities² from government set the bar of what is considered affordable quite low. Evidence received from Professor Fitzpatrick, the Director of Institute for Social Policy, Housing and Equalities Research (I-SPHERE) at Herriot Watt University characterised this position as being as long as you weren't going to be destitute then a property could be considered affordable. The Panel was advised that a more equitable approach would be to base the assessment on what a person's residual income was after housing costs had been factored in. The evidence we received set out that there is a net-cost to the Council from every type of accommodation used for TA, other than Haringey owned stock.
- 5.2 One of the key challenges identified as part of this review is around the nexus between a lack of social housing, rising rent costs (especially in London), and increasing demand on homelessness and temporary accommodation services. The Panel acknowledges the pressures that the Council faces with increased demand, a lack of supply and increased costs. This has a big impact on some of the key themes of this review i.e. in-borough versus out-of-borough placements, affordability, and our ability to offer residents a degree of choice in the process. The discrepancy between Local Housing Allowance rates and average market rents, means that a lot of properties in the private sector are not affordable unless the local authority is willing to subsidise the shortfall. This has a significant impact on the availability of affordable private rented sector housing available to use as TA.
- 5.3 The Panel spoke to the Managing Director of Morland & Co. Housing consultancy who works with the Scottish and Welsh governments, as well as different local authorities, around social housing and homelessness. During the course of this evidence session, the Panel were advised that in a previous role, Mr Morland worked as a special advisor to the previous Labour government on homelessness. The Panel received evidence that, during the time that the last Labour government was in office, levels of TA went from a then record high of 101k in 2004 to a low of 48k in 2011. The Panel were advised that the two key actions that were instrumental in the achieving this reduction, and which could be taken by the current government are: To uplift the current TA subsidy rates which are currently frozen at January 2011 rates – which results in significant debts to local authorities; and to increase LHA rates up to the 50th percentile,

²https://assets.publishing.service.gov.uk/media/67add3246e6c8d18118acd2f/Homelessness_Code_of_Guidance_30_May_2025.pdf

and to ensure that they were uprated annually. At present LHA rates are set at the 30th percentile of local market rates as of April 2024.³ London Councils have undertaken a piece of analysis that shows the gap in temporary accommodation costs and what was received from the government was around £96m in 2022-23, and that the gap for 2024-25 is estimated at £140m, equating to a 45% increase.⁴

- 5.4 The latest government figures available online are for the year to March 2024, these figures show that the number of households in TA was 117k (a 12% increase from the previous year) and that there were over 151k children living in TA. An article in the Guardian in April highlighted the fact that the total cost to local authorities for providing TA was over £2 billion and that local authorities were paying up to 60% above market rates for TA due to the demand.⁵ A June 2025 report from the Shared Health Foundation found that temporary accommodation had contributed to the deaths of at least 74 children in the last five years, of whom 58 were aged under one.⁶ Increasing the subsidy and LHA rates would significantly reduce the debt burden on local authorities from providing TA and also increase the affordability of placements in the PRS.

Recommendation 1

That Cabinet lobby the government to: a) Change the TA subsidy rates and move them up to match current market prices. The rates are stuck at January 2011 rates and LAs are incurring significant debts because government hasn't uplifted the rates; b) Move the Local Housing Allowance rates up to the 50th percentile (rather than 30%) and ensure they are up-rated annually.

Pan-London Framework

- 5.5 The Inter Borough Accommodation Agreement (IBAA) was introduced in 2011 which was set up to prevent boroughs from out-bidding each other when securing temporary accommodation, in order to strengthen their collective position when dealing with temporary accommodation providers. It included a commitment for councils not to outbid each other by paying landlords higher rent than the borough receiving the placement would offer.
- 5.6 The Panel received evidence that in light of increasing pressures on temporary

³ <https://www.gov.uk/government/statistics/local-housing-allowance-indicative-rates-for-2024-to-2025/indicative-local-housing-allowance-rates-for-2024-to-2025>

⁴ <https://www.londoncouncils.gov.uk/news-and-press-releases/2025/ps330m-homelessness-overspend-housing-crisis-threatens-bankrupt-london>

⁵ <https://www.theguardian.com/society/2025/apr/27/homelessness-crisis-councils-england-pay-above-market-rent>

⁶ https://sharedhealthfoundation.org.uk/wp-content/uploads/2025/05/SHF_absolute_scandal_report.pdf

accommodation, a number of boroughs have stopped adhering to the agreed pan-London rates due to the pressure of meeting high demand, and as councils have become increasingly desperate. This problem has also been exacerbated by the Home Office buying up large amounts of longer-term temporary accommodation in recent years to house those seeking asylum, without signing up to the IBAA.

- 5.7 The Panel believes that there needs to be a renewed pan-London agreement across all 32 London Boroughs which sets a series of updated rates that each authority agrees to adhere to when placing residents in temporary accommodation. This will require a certain amount of mediation and political will, both at the national levels and across London. London Councils has drawn up guidance on affordability in the past.

Recommendation 2

That the Council strengthens its representations to the Mayor of London and the government around the need to agree and enforce a framework of pan-London TA rent levels, in order to prevent London boroughs competing with each other and driving up prices.

- 5.8 The Panel heard evidence from I-SPHERE that there were concerns that in some instances affordability checks were being used to exclude people who were on benefits from being placed in PRS accommodation or housing association properties. The Council has nomination rights to place people in a housing association property and consequently should have more influence with them that it does with private landlords. I-SPHERE advised that their evidence showed that 39% of larger housing associations in England were rejecting people based on affordability checks, but that this dropped to 13% for smaller housing associations. The Panel are concerned that some of the larger housing associations were becoming less and less interested in operating within the field of social housing and often sought to exclude those on Universal Credit from being a tenant.
- 5.9 The Panel understands that there are legitimate reasons for a housing association wanting to know whether a tenant is able to afford their rent, and that there may be certain areas where financial viability is more of a concern than others. The Panel were advised by I-SPHERE, that what they were seeing was a distinction by providers about what they did in response to undertaking a financial assessment. Some were making different choices; such as helping with maximizing income, helping people into employment, looking at using Discretionary Housing Payments. Others were using the financial assessment to exclude people. The Panel were advised that councils could challenge a decision by a housing association to refuse to house someone based on affordability. It was also suggested that housing associations were circumspect in advertising that their decisions could be challenged.

- 5.11 Councils have the right to nominate whoever they want to a provider, and housing associations have the right to have their own policies on who they will accept. The Panel were advised that there is case law that supported the fact that the policy set by a housing association cannot be used to systematically undermine the Council's position. Haringey has 55 registered providers that own stock in Haringey. The Panel were advised that technically each one of these should be providing their allocations policy to the Council, but this often doesn't happen. The Council and registered providers have shared obligations around tenancy standards issued by the Regulator of Social Housing and as social landlords, the Panel feels there should be a more collective approach taken across the sector. The Panel were also advised that local authorities needed to do more in relation to improving poor quality, or non-existent, information around the nominations they put forward to providers.
- 5.12 In Haringey, approximately 50% of social housing is council owned, which equates to around 14000 properties. The other 50% is owned by housing associations, of that around 8000 is owned by the largest five providers. The Panel believes that the Council should ensure it has a clear nominations agreement with each of the large providers and that they should be pushed to do more to support residents who may fail affordability checks, such as income maximisation and use of DHPs. The Panel also believes that the Council should be doing more to challenge housing associations when they refuse to place a resident on the ground of affordability.
- 5.13 As part of the process of providing comments on this report prior to its publication, officers from the Housing service have advised that nominations to registered providers, that the Council has an agreement in place with, fell under the Allocations policy, rather than TA Placements or the PRSO Allocations policy.

Recommendation 3

That the Council makes it its policy to challenge housing associations if and when they refuse to place someone on the grounds of affordability

6. Equalities Monitoring

6.1 The Panel received evidence that there was significant national research that showed that people from minoritised communities are more likely to spend longer in TA, are more likely to be moved out of borough, and are less likely to be housed at the end of the statutory homelessness period. In relation to increased likelihood of out of borough placements the Panel heard that social housing allocation systems may unintentionally discriminate against minoritised ethnic communities who understand less about how these systems work and have less knowledge of their housing rights. Consequently, they may be more susceptible to being placed out of borough. We received evidence that Shelter will often advise clients to accept a placement and then seek to challenge it once they have moved in, rather than risk being made intentionally homeless by the local authority.

6.2 One of the research programmes currently being undertaken by I-SPHERE is a statistical examination of Homelessness and Black and Minoritised Ethnic Communities in the UK, with the aim of supporting a step change in knowledge and capacity. They published a statistical report on the state of the nation in November 2022 and the final programme report is currently being drafted. Some of the key findings of the report are summarised below.⁷

- There is overwhelming statistical evidence that people from Black and minoritised ethnic communities, taken as a whole, experience disproportionate levels of homelessness in the UK
- In England, the very highest levels of homelessness risk is experienced by people from Black and Mixed ethnic backgrounds. These groups seem particularly exposed to statutory homelessness. Black people are three and a half times as likely to experience this as White British people. Asian people in England, on the other hand, are at highly disproportionate risk of more hidden aspects of homelessness, such as overcrowding or doubling up with other households.
- The disproportionate risks of experiencing homelessness faced by Black and Mixed Ethnicity households are substantially heightened in London over other parts of the UK.
- Experience of discrimination, harassment or abuse on grounds of race or ethnicity in housing is associated with elevated risks of homelessness. This is particularly true amongst Black people with experience of homelessness, 32% of whom report discrimination from a social or private landlord.
- The heightened risks of homelessness faced by (some) Black and minoritised ethnic communities cannot be fully explained by socio economic, demographic and other factors. Rather, ethnicity-related variables increased the relative risks of homelessness (including ethnic

⁷ [Homelessness Amongst Black and Minoritised Ethnic Communities State of the Nation Report 2.pdf](#)

and racial background, having a migration background, and experience of discrimination).

- 6.3 The research above paints a stark picture that people from minoritised communities are disproportionately affected by homelessness and are less likely to be housed at the end of the statutory homeless period. Many of the reasons for this are structural i.e. homelessness is often not the fault of individuals but instead systems that have enabled homelessness to persist. The report identifies that the drivers of homelessness are wide and varied: They include a lack of affordable homes, poverty, an over reliance on insecure private tenancies as well as temporary accommodation, through to social issues stemming from a lack of timely, equitable support for mental health difficulties, family breakdown and domestic abuse. It is recognised that tackling the structural drivers of homelessness and the disproportionality underpinning it would require huge policy shifts at the national level. Local councils have limited ability to offset the drivers listed above, given the lack of funding available to local government across the sector. However, the Panel believes that the Council should be undertaking equalities monitoring for the people in TA so that it can track these trends and demonstrate an awareness of the disproportionality, and take any necessary action in response. There may be explanatory factors in some cases, such as bigger households or unfamiliarity with the system. Being able to demonstrate that any bias is unintentional, being aware of the factors behind any disproportionality, and acting accordingly, is seen by the Panel as a necessary measure.

Recommendation 4

That Cabinet commit to undertake equalities monitoring for households in temporary accommodation. This monitoring should include the ethnicity of households in temporary accommodation, the ethnicity of households who are placed out of borough and the length of time households are in TA. This is a reflection of concerns that there is a national disproportionality around ethnicity and temporary accommodation. The council should consider its monitoring evidence and whether it needs to address unconscious bias in its own decision-making.

7. Choice

- 7.1 In examining the existing Placements policy and PRS Discharge policy, one thing that stood out to the Panel was the lack of choice or agency that residents have when being placed either in TA or in the private rented sector. There is no right of internal review against the suitability of accommodation offered to applicants for interim placement under Section 188. The number of people applying for this who have the means to pursue a challenge through the courts is presumably quite low. Officers have advised that there is support available through legal aid, however awareness of the availability of legal advice is likely to be a barrier to this, as is the well published delays in the court system from a backlog of cases.
- 7.2 Under both policies the Council will make one offer of a suitable placement and if that is rejected the applicant could be made intentionally homeless. The Panel understands the financial pressures and sheer scale of demand on the Council from temporary accommodation, and housing more generally. Without a step change in policy and a commitment from government to properly fund the building of new social housing at scale, these problems will continue. The Panel acknowledge the Council's key commitment to building 3000+ new homes at social rent, but significant additional resources would be required to build enough homes to house the 14k households on the housing waiting list.
- 7.3 There is a general perception that those that are given an offer of a longer term TA placement are the lucky ones, as there are plenty of other households who may never receive an offer. That being said, the Panel believes that there must be some way to make the process less demeaning. One way to do so would be to look at ways to bring a degree of choice or agency into the process. Evidence received from Prof. Fitzpatrick was that their research showed that nationally, the issue of intentionality and the discharging of the housing duty had almost become weaponised and that often people felt coerced. Evidence received from Shelter supported this.
- 7.4 When the Panel put its assertion about choice to officers, they acknowledged that choice was an important aspect and that it was something that could be built into the policy, however it was commented that this choice would have to be framed in realistic terms. Officers set out that, at present households being offered temporary accommodation and particularly emergency accommodation were likely to have very limited choice as it would often be the case that the Council had only one property available to offer them. It was acknowledged that there was greater scope for choice when moving people into the PRS. Officers also stressed the need for the Council to be able to discharge its homelessness duty following a refusal of suitable accommodation. Officers advised the Panel that if the Council moved towards a position of seeking to provide more out-of-borough accommodation (as part of a wider drive to provide more accommodation in total), then the opportunity for people to exercise some choice and control was in everybody's interest. However, it was also the case that households who were willing and able to move to settled accommodation outside of London were likely to be in a position to exercise the most choice.
- 7.5 Officers suggested that the development of a new policy was an opportunity to

develop an additional option, that sat alongside the policy, which basically offered to provide accommodation to a person in TA that was outside of the local area on voluntary basis. It was suggested that this would afford some opportunity for choice and control over what that offer might look like, in terms of size, location and type of accommodation. There would also be an opportunity to provide a basic offer of support, such as getting in touch with another local authority about school placements. The Panel supports giving people an option to move out of borough on a voluntary basis and acknowledged there may be reasons why someone would be happy to do so, such as more space, family ties to a local area or access to good SEND provision. The Panel is keen that a package of support is developed to assist those who would be willing to move out of the local area in order to ensure that families are able to make this work. Particularly in instances where there may be a language barrier, or the process of registering for local services may be unfamiliar to them.

- 7.6 The Panel also believes that separate to the provision of choice, the Council also needs to be clear with residents about what the process is, the likely outcomes when you have been through the process, and the timescales involved. It is suggested that there needs to be clear communication with residents that just because you are in TA and waiting for a permanent housing settlement, you may not ever actually receive a permanent placement, and if you do it could take years. The Council simply doesn't have the capacity to house everyone that is facing homelessness as well as those that are on its housing waiting list. Anecdotally, Edinburgh City Council recently suspended their allocation of general needs housing entirely, in order to allocate all of its available housing stock to homeless housing, due to the pressures in TA and homelessness targets set by the Scottish Government.⁸

Recommendation 5

That Cabinet explore ways it can try to build in a degree of choice and agency into the process of determining how and where somebody is placed. The Council also needs to provide clear communications to residents about how long they may be in TA, as well as what the possible options are in relation to being placed out of borough. The Panel supports the idea of there being an offer available to families who are happy to be placed out of borough, and that they are supported through the process

⁸ <https://www.scottishhousingnews.com/articles/edinburghs-suspension-of-housing-allocations-a-bold-step-to-tackle-homelessness#:~:text=The%20City%20of%20Edinburgh%20Council,properties%20for%20people%20experiencing%20homelessness>

8. Domestic Abuse

- 8.1 The existing TA Placements policy does not specifically mention domestic abuse (DA) as a relevant factor when considering an offer of temporary accommodation. Safeguarding and the welfare of the children is referred to, along with special circumstances. Similarly, the existing policy makes no mention of prioritising those fleeing DA for either an in-borough or out-of-borough placement. The existing PRSO policy does list those fleeing domestic abuse as a circumstance that would qualify that household as being given Priority Band 1 for an offer in the private rented sector. The policy also stipulates that clear evidence from police or Hearthstone or the Anti-Social Behavior team is required. The Panel believes that this is not in-line with best practice in relation to domestic abuse and that the need to provide evidence could place victims at increased risk. It is recognised that fleeing domestic abuse is a relevant consideration when determining priority need for emergency or longer-term accommodation, under Section 189 of the Housing Act 1996. Therefore, domestic abuse is a factor indirectly, but the Panel believes this should be made explicit in the revised TA Placements policy.
- 8.2 The Panel received evidence from Praxis, a migrant and refugee advocacy advice service. As part of the evidence they provided, Praxis commented that many of the people they worked with could be fleeing domestic abuse, trafficking or modern slavery. Many also had complex needs and a lot had experienced trauma. Praxis highlighted the extreme vulnerability of migrant women and their increased likelihood to be fleeing domestic abuse. The Panel were advised that placing them in accommodation out of London put them at increased risk as it made them even more isolated, and this made it more likely that they would return to the perpetrator. It was suggested that migrants tended to rely heavily on small pockets of community, particularly if they did not have any family here. This made asking them to relocate to a completely different city more challenging and increased the likelihood of them returning to London. Praxis also advised that migrants should be allocated TA rather than a PRSO due to the complexity and unfamiliarity of being placed in private rented sector accommodation. Shelter gave evidence that they were seeing high rates of return to Shelter's advice service and increased levels of families presenting as homeless again, from families placed out of borough in a PRSO, who were not given adequate resettlement support. Shelter echoed the evidence given by Praxis, in that they considered this particularly problematic for those fleeing domestic abuse due to the risk of them returning to the perpetrator.
- 8.3 The Panel believes that the policies should recognise a person fleeing domestic abuse as a category for prioritisation for either a TA placement or a PRSO. The policies should also reflect that the decision as to whether they are placed either in borough or out-of-borough should be determined by that person's individual circumstances, and they should be prioritised for a placement accordingly. In some cases, the person might want to be close to support networks, but in some instances, those support networks might be elsewhere, or else the person might actively want to move away. An individual assessment would need to be taken, based on their situation and the extent to which they are at risk. The Panel also believes that vulnerable residents, including those fleeing domestic abuse, should not be placed in accommodation that is reliant on shared facilities

outside of the accommodation like external laundry facilities.

Recommendation 6

That the policy in relation to how domestic abuse survivors should be prioritised should be updated in line with latest best practice, including by removing the stipulation in the PRSO policy that police evidence needs to be provided, and by setting out that survivors may be prioritised either for in-borough/local placements OR a placement further away from the perpetrator, depending on the circumstances of the case and the survivor's wishes.

9. Out of Borough Placements

- 9.1 The Panel received evidence regarding the 2015 Supreme Court ruling *Nzolameso vs Westminster City Council*, which looked at whether it was lawful for a local housing authority to accommodate a homeless person a long way away from the authority's own area, where that person had been living. As part of its ruling, the Court reasserted that Section 208 of the Housing Act 1996 required Councils to provide accommodation within their own district, so far as was reasonably practicable, when discharging their homelessness duties. In the ruling, Westminster Council were found to have failed to fulfil their obligations, under the Act, in finding accommodation in or near the borough. The decision taken by the local authority to end their main housing duty to the appellant was quashed.⁹
- 9.2 The Panel received evidence from Mr Morland that the ruling effectively stated that the local authority had a duty to provide TA in the borough in which the application was made. If it did not have any TA in that borough, it should look to its immediate neighbouring boroughs and then the next neighbouring boroughs and the next ones, in a ripple out effect. The Panel were advised that the Court was not keen on councils arbitrarily placing people far away from their home borough (with certain exceptions for things like domestic violence). Crucially, Mr Morland stated that the Court was also clear that the law had always been that once a person had been placed out of borough, the local authority should be looking to bring that person back into the borough as soon as possible.
- 9.3 Prof. Fitzpatrick advised the Panel that, in effect, the law operated in splendid isolation from policy and practice. The legislative framework required authorities to provide homes for people in a variety of circumstances and that the authorities should be doing everything possible to place people in or near their home borough. However, the pressures on the housing market meant that local authorities are unable to find homes for people, especially in London and the southeast, and when they did find homes, they were not affordable. In the evidence we received, it was suggested that there was the option of using discretionary housing payments for people who were claiming benefits, in order to support them remaining in London. It was also suggested that there may be discretionary funds available in Adults and Children's to help with specific cases involving particular welfare needs or disabilities. It was also suggested that there was the option of local authorities creating their own support fund for keeping people in the local area, by creating a dedicated budget in the General Fund.
- 9.4 The Panel is cognisant of the financial pressures facing the Council and that Temporary Accommodation is one of the three main demand led drivers of the Council's in-year overspend budget position. The high levels of demand for temporary accommodation contributes directly to the overspend position. The reality of the situation is that the Council simply can't afford to provide homes in the borough for everyone in TA, even if those homes existed in the first place.

⁹ <https://www.supremecourt.uk/cases/uksc-2014-0275>

The creation of a dedicated budget to support people in TA to remain in and around Haringey is not considered to be feasible by the Panel in the current climate. Furthermore, moving funding from somewhere else would simply underfund another service area that is facing its own pressures. Use of discretionary housing payments or discretionary funds in Adults and Children's may be an option in specific cases, but use of it is not felt to be something that could fundamentally alter the overall pressures facing the Council in this area.

- 9.5 In their submission to the Panel Shelter commented that they strongly supported the stipulation that local authorities should be doing everything they could to keep people in borough. We received evidence about the difficulties involved with families having to regularly move around with interim placements and difficulties with people being moved from one local authority to another. It was commented that the number of moves a family went through has a direct impact on the family's physical, emotional and mental wellbeing and also increased the likelihood of records being lost. Shelter advised that they would like to see the number of moves households had to make kept to a minimum, in order to minimise the disruption on that family. One key area of concern was around schools, with parents being unwilling to put their children in schools close by as they didn't know how long they were going to be there. Being placed out of borough and into another part of London impacts travel costs to work and school. Shelter provided an example of a parent having to pay £23 each way on travel costs to school, which resulted in that child regularly missing school.
- 9.6 In the evidence given to the Panel by officers and by the Cabinet Member, it was noted that the administration were looking to acquire more accommodation, through the HCBS, as part of the invest to save 2025/26 budget proposal in Housing Demand. It was stated that this accommodation would not necessarily be in-borough. There was also a recognition that the Council needed to look at what it could do to properly support people as part of a move, both financially but also follow-up sustainment support. Officers advised that the new PRS discharge policy could remove the stipulation about in what circumstances people will be offered an in-borough vs out of borough placement and instead just focus on assessing the suitability of an offer. It was acknowledged by the Housing Service that increasing the number of people placed outside of the local area would have an impact on our inspection regime and that it would require back-office systems to be in place to support it.
- 9.7 When it comes to placing people out of borough, the Panel are concerned generally about it becoming a race to the bottom, and that more and more local authorities will start placing people in places like Middlesbrough and Stoke, where housing costs are significantly cheaper. The Panel notes that when a London local authority discharges its housing duty by placing a household in a town or city far from London, it will be paying that landlord London rates and that has a knock on effect, pushing up rents in that area so that the local authority where the placement is made can no longer afford to place residents within its own local area. The potential for this problem to exacerbate an already strained temporary accommodation system seems self-evident.

- 9.8 The Panel received evidence around the impact on community cohesion from London boroughs moving people into accommodation in towns and cities far from London, where accommodation was much cheaper. Shelter raised concerns about groups being placed into communities that may be hostile to them and where there aren't the jobs, places of worship or school placements available, in that location to support them. An example was provided to the Panel of an East London borough leasing a converted warehouse in Brentwood for 80 households in TA to live in, this was done with very little communication with the local authority in Brentwood. The influx of 80 households in a short space of time, with very little support, had a significant impact on local services. Local authorities have a duty to notify the relevant local housing authority when placing them in another borough. The Panel is concerned that this isn't always happening and the associated impact on communities and local services is only going to increase if more authorities start placing people out of the local area. The Panel would like to see the government do more to ensure better communication between different local housing authorities and the need ensure that the services exist to accommodate them there.

Recommendation 7

The Panel understands the rationale in seeking to provide more out of borough accommodation, but requests assurances from Cabinet that the Council will still be doing everything it can to secure in-borough accommodation and that discharging people into the PRS out of the local area will be a last resort. The Panel is concerned about the national knock-on effects from London Boroughs placing large numbers of people in places with comparatively cheaper rent costs.

Recommendation 8

The Panel are concerned with the possible impact on community cohesion if London Boroughs start placing large numbers of people into the PRS outside of London. The Council should ensure that a risk assessment is conducted when placing families out of borough, which takes into account possible community tensions and whether they can effectively be mitigated.

Recommendation 9

The Council should model best practice by communicating with the local authority they are placing a household in, if placing out-of-borough, and request that the household is supported to arrange primary school placements, access to GP surgeries and any other local services that may be of use to them. Haringey should also provide this for any households placed in Haringey by other councils.

10. Supporting those in TA

- 10.1 The Panel believes that there are additional financial and administrative burdens that arise out of being placed in TA, especially when a household is placed far away from their existing support networks and the children have to travel further to get to school. The Panel would like to see additional support available to those living in TA, in terms of a dedicated pot of money that people can apply to in order to assist with the additional costs incurred, particularly from being placed out of borough. In addition, there also needs to be a dedicated officer resource in place to support people in TA who would be responsible for ensuring people are able to access financial support through the proposed TA support fund, and to be able to provide people with an update on the status of their case. The Panel believes this should be a dedicated resource and should go above the usual support that any household in crisis would receive.
- 10.2 Shelter advised that one of the key areas in which they would like to see improvements was around additional support to people in TA. It was suggested that some boroughs were able to provide access to community kitchens, free laundry provision in different sites across the borough, and food vouchers. Haringey provides food vouchers to people placed in hotel accommodation where there is no cooking facilities. Shelter gave evidence that there was a need for dedicated TA support within the Council, not least to be able to provide updates to families on their application. Shelter stated that one of the main drivers for households contacting Shelter is people who don't know what is happening with their case and so they are unable to make a decision about their future. In relation to placements into interim accommodation, Shelter advised that they were seeing a lot of cases where parents did not know whether to relocate their children to schools close by, as they had no idea how long they were going to be in that accommodation.
- 10.3 Shelter gave evidence that there needed to be more resettlement support for people who were being placed out of borough, or those who were taking up a placement in the private rented sector. The issues around where to place people in TA or PRS were felt to be broadly the same, and the key issue is around support and a household's ability to settle into their new placement. It was suggested that wrap around support was needed, particularly for PRS placements, as people were giving up their right to a secure social housing tenancy. It was also suggested that there was a need for more in-person support for certain cohorts, such as the digitally excluded and those just transitioning from NRPF. Shelter gave evidence that they deliver housing awareness workshops for local authorities, and that the main thing most families wanted was security of tenure and being able to avoid having to move around a lot to different placements, given the disruption this involved. Shelter set out that they would like to see longer term tenancies (up to five years) provided for families discharged into the PRS.
- 10.4 Praxis gave evidence to the Panel that the transition from NRPF to being entitled to mainstream support, including housing, was a difficult transition for many households that they supported. They were often evicted from Home

Office accommodation at short notice and were required to open a bank account, apply for benefits, apply for housing support, usually with very little understanding of how these systems worked in the UK. It was commented that applying for housing support could be one of the more challenging parts as key documents were often not translated, there was a general lack of interpreters and many were not appropriately advised on their rights, which could lead them refusing an offer of accommodation and being made intentionally homeless. As an example of good practice, Praxis cited Wandsworth, who had developed good working links between social services and the housing team, so that people in Section 17 housing (discretionary housing for families with children who have NRPF - provided while the family waits for an immigration appeal decision from the Home Office) had an officer who managed their transition from social services to the housing service, and those in Section 17 accommodation were prioritised for TA by the housing service.

- 10.5 Praxis commented that having a migration and resettlement team was important in order to manage the homelessness journey for refugee and asylum seeking households, as well as the need for good lines of communication between different council teams more generally. The Panel welcomes the evidence it received from the Housing service, that Haringey's resettlement team was very effective. Praxis were supportive of the need for a dedicated support service for those in TA, commenting that regardless of the particular circumstances or vulnerability of a household, they were likely to need a degree of support in navigating their journey through TA. The Panel also received evidence that tenancy support was vital in order to provide households with a route out of TA, and that TA could often result in people becoming trapped in cycle of living in poor quality housing and being stuck on Housing Benefit. The need for tenancy support to be properly resourced was also highlighted, in order to ensure that the support was genuinely available and made an impact. It was suggested that to do this in a meaningful way, it should be done in partnership with charities and other key VCOs in the sector.
- 10.6 As part of the evidence gathering process, officers were broadly sympathetic to the general idea that people moving out of the borough would need some level of follow-up sustainment support in order to make the move work. Officers acknowledged that the Council needed to properly support people and that this was more than just financial support. The Council has an existing team that supports people in TA, but the Panel was advised that those officers could have a caseload of around 300, so there was a limit to the amount of support that could be provided to individual households. The Panel welcomed the evidence it was given that the service was recruiting additional officers whose focus was getting people out of nightly paid accommodation and would also potentially be able to provide some of the wrap around support, like arranging school placements in another borough.
- 10.7 The Panel received evidence that there wasn't a dedicated fund in place to support those in TA, but there was the option of exploring whether Discretionary Housing Payments could be used to support someone to take up a PRS placement. We received evidence that the Council offered incentives to

landlords, based on the bedroom size and based on negotiations between the landlord and the Acquisitions Officer. These are used for prevention scheme properties and would require the tenant receiving a tenancy covering at least 24 months. The Council also has a rent deposit scheme which would usually cover the deposit and first month's rent, this is for PRS placements where the tenant finds their own accommodation. In respect of travel costs, the Cabinet Member acknowledged that there was a difference in travel costs for people in short term placements who are moved out of borough and those with longer term settled placements that they could be living in for years. The Panel believes that the type of financial support available should be tiered to the type of accommodation that a household is placed in and whether, for example, being placed out of borough incurs additional travel costs.

- 10.8 The Panel is cognisant that resettlement support will not be available to every household and that there is a cost implication in providing it. The Panel's view is that being able to support households who are willing to be placed out of the local area is likely to be a cost benefit to the Council, and it also increases the likelihood of that family finding a settled placement and not returning to the local authority in need of further assistance. Being able to place people in settled accommodation is crucial to reducing the pressures on TA and the length of time residents wait for a long-term solution to their housing situation. The Panel is interested to know more about plans to acquire additional properties through the HCBS to alleviate some of the pressures on TA and is supportive of being able to offer households the option of being housed outside of the borough, with a package of support, if that means the organisation is able to increase the number of longer term placements it can make, as well as reducing the number of households on the waiting list. One further issue that the Panel is concerned with is the need for there to be some form of in-person offer to those in TA. Digital exclusion is an issue with increasing salience as more and more activities shift online. It is likely that some of the people in TA will have a range of additional needs and are more likely to require some level of face-to-face support.

Recommendation 10

The Cabinet consider setting up a dedicated fund, that people in TA are eligible for, in order to help them meet the additional costs and difficulties caused by being in TA, particularly when placed away from the borough. The financial support should be tiered to the type of accommodation they have been placed in and whether they have access to cooking and laundry facilities, for example. If someone is placed in a different part of the country, they will require support with relocation costs.

Recommendation 11

In addition to a dedicated fund, there should also be a dedicated TA support officer(s) to provide updates on a person's case, ensure that people receive any financial support through the proposed TA support fund, and also to ensure there is dedicated resource available for those applying for TA to contact. It is suggested that there should be an in-person offer available for residents who may be digitally excluded.

11. Quality and Inspection regime

- 11.1 Shelter's general position on TA is set out in a 2023 report they published called 'Still Living in Limbo' which calls for an end to placing families in TA due to the effects it has on those families, such as overcrowding, poor standard of accommodation and the impact on mothers with young children.¹⁰ As part of the evidence they provided to us, Shelter acknowledged the pressures facing local councils and advocated that in cases where shared facilities were necessary, then it should only be for a maximum of six weeks. It was commented that any shared facilities need to be adequately resourced so the disruption to people's lives was minimised. Shelter advised that they work with a GP practice in Newham. They reported that there has been a noticeable impact on those children's development from a lack of space and lack of cooking facilities
- 11.2 The Panel are concerned about the quality and suitability of some of the accommodation used for TA, particularly in terms of placements in the private rented sector, with anecdotal accounts of a poor standard of quality, disrepair, and a general sense that it is often not fit for purpose. The Panel would like to see a robust quality and inspection regime of all properties that we place households in. It is suggested that the mechanisms that we use to carry out property checks and to ensure suitability should form part of the revised PRS Discharge policy. With the likely expansion of TA placements and placements made into the PRS being done out of borough, the Council will need to have a robust assessment process in place to inspect these properties, given the additional reputational risks to the Council from placing more people out of borough. Officers advised that there would be a need for physical inspections to take place as well as improvements to back-office systems.
- 11.3 Praxis gave evidence to the Panel that they were part of a better TA initiative campaign which promotes that TA should be of a good standard and should ensure five basic amenities; cooking facilities, WIFI, laundry, storage and information. The Panel also received evidence around the Setting the Standards Initiative, which is a Pan-London initiative, that undertakes inspections of B&Bs and nightly paid accommodation against legal compliance standards. The organisation is led by the West London Commissioning Alliance and most London boroughs, including Haringey, are part of it. It was suggested to the Panel that having a centralised approach was beneficial as it promoted consistency across London. There were some concerns raised that local authorities did not always have sufficient regard to the advice of the Setting the Standards team around not using particular housing units. B&Bs and Nightly paid accommodation are the most expensive type of TA on the market and it is estimated that the cost is twice what the local authority receives in income from the placement.
- 11.4 The Panel received evidence that inspections were pivotal to ensuring

¹⁰https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/still_living_in_limbo

suitability and that accommodation was not dangerous. Another concern was around the need to inspect repairs work carried out in order to ensure that repairs were being carried out properly, it was suggested that this was particularly relevant when contractors were used rather than in-house staff. The Panel also received evidence about the problems in the sector with poor quality landlords as well as dishonest management agents, who failed to pass on repair issues and complaints. Shelter commented that landlords were often held to account but bad management agents were not. The Panel would like to see a property register held by the Council that was kept up to date with the details of landlords and management agents (where applicable) that the Council was happy to work with when discharging people from TA into the private rented sector. The Council already maintains records of inspections in the PRS for general housing, as well as information submitted to the Council through the mandatory, selective, and additional licensing schemes that are in place in the borough.

- 11.5 The Panel received evidence that the Council undertook inspections and that providers who managed accommodation like B&Bs would carry out their own inspections. The Council in most cases would inspect prior to acquiring the property and the frequency of inspection visits would be determined by the type of accommodation and whether there were any complaints around disrepair or other issues of concern, such as safeguarding. The Panel were advised that the Council does not log details of the management agent at present, but both would be treated the same way in terms of maintaining the obligations under the terms of the agreement the Council had with them.
- 11.6 The Panel acknowledges that there is an existing inspection regime, some of which is carried out by the Council and some is carried out through Setting the Standards. However, it is also understood that there are cost pressures facing local government and the extent to which inspections are always carried out, done in person, and the extent to which inspections are prioritised based on risk factors, is queried by the Panel. The availability of trained Housing Health and Safety Rating System qualified assessors will be a major factor in the number of inspection visits it is physically possible to carry out in any period of time. With a possible expansion of out of borough accommodation, the demands placed on individual assessors is likely to increase. In addition to B&B and nightly paid accommodation being inspected on a pan-London basis, the Panel would like to see a strong inspection regime for all TA, but particularly those in the private rented sector, due to concerns about the standards and level of disrepair, with that type of accommodation. The Panel is also supportive of the key provisions for TA set out in the Better TA initiative of providing cooking facilities, WIFI, laundry, storage and information. It is believed that the Council should be looking to emulate this as basic standard in TA, where the type of accommodation allows.

Recommendation 12

That the Council ensures there is a robust inspection regime to ensure that accommodation is up to standard. If the number of people being placed out of borough is to increase, then the Council will need processes in place for inspecting accommodation that is outside of the local area. It is anticipated that this will require additional staffing resources.

Recommendation 13

The Council should also maintain a register of reputable landlords and managing agents, and their contact details, that we are willing to work with when discharging people into the PRS. This is linked to the inspection regime above.

Appendix 1

A list of contributors who gave evidence to the Scrutiny Review

Contributor	Organisation	Date
Darren Fairclough	Head of Lettings & Rehousing, Haringey Council	18 th March 2025 & 8 th May 2025
Hannah Adler	Head of Temporary Accommodation, Haringey Council (previously the Head of Housing Policy & Strategy).	18 th March 2025
Simone Strachan	Strategic Lead for Shelter London	2 nd April 2025
Teya Cooper	Support Coordinator, Praxis	3 rd April 2025
Professor Suzanne Fitzpatrick,	Director of the Institute for Social Policy, Housing, Equalities Research at Heriot Watt University.	28 April 2025
Neil Morland	Managing Director, Morland & Co. Housing Consultancy.	28 th April 2025
Jacob Meyer	Reviews Manager, Haringey Council	8 th May 2025
Cllr Sarah Williams	Cabinet Member for Housing & Planning (Deputy Leader), Haringey Council.	8 th May 2025
Pree Edwards	Interim Head of Temporary Accommodation, Haringey Council	N/A