

# Community Wellbeing and Housing Committee



28 November 2024

<b>Title</b>	Placement Policy for Emergency Accommodation
<b>Purpose of the report</b>	To make a decision
<b>Report Author</b>	Steph Green, Assistant Strategic Housing Lead
<b>Ward(s) Affected</b>	All Wards
<b>Exempt</b>	No
<b>Exemption Reason</b>	Not Applicable
<b>Corporate Priority</b>	Addressing Housing Need
<b>Recommendations</b>	<b>Committee is asked to:</b> Approve the placement policy for emergency accommodation.
<b>Reason for Recommendation</b>	It would be good practice to have a policy that shows clear guidance on how homeless households are prioritised for emergency accommodation in-borough as opposed to out of the borough.

## 1. Summary of the report

What is the situation	Why we want to do something
<ul style="list-style-type: none"> <li>A local authority must provide interim (emergency) accommodation while it makes inquiries into a homeless application if it has reason to believe that the applicant is homeless, eligible for assistance and in priority need.</li> <li>Demand is often high resulting in some households being placed out of the borough.</li> </ul>	<ul style="list-style-type: none"> <li>It would be best practice to clearly outline how the Council prioritises homeless households when placing them into emergency accommodation.</li> <li>When demand is high and supply is limited, a policy will provide guidance on who will be prioritised for offers of local interim accommodation.</li> </ul>
This is what we want to do about it	These are the next steps
<ul style="list-style-type: none"> <li>Implement a policy specifically outlining how priority is given.</li> </ul>	<ul style="list-style-type: none"> <li>Approve the policy provided in Appendix A.</li> </ul>

1.1 This report seeks to implement a policy that outlines how the Council prioritises homeless applicants when making emergency accommodation placements.

## 2. Key issues

- 2.1 Following a staff training session where a case study was shared, it was decided that it would be good practice to have a policy that shows clear guidance on how homeless households are prioritised for emergency accommodation in-borough as opposed to out of the borough.
- 2.2 In brief, the proposed policy covers how emergency accommodation offers will be made and how refusals will be handled. It considers suitability of emergency accommodation and outlines factors that will be assessed, including location, property size, property condition, available facilities, affordability, health, education and employment.
- 2.3 For information, as at the 5<sup>th</sup> August 2024, there were a total of 203 households in emergency or temporary accommodation. Details of how many were placed in-borough as opposed to out of the borough is as follows:

### Households with children under 18:

Local Authority	Spelthorne	Hillingdon*	Hounslow	Runnymede	Total
<b>Nightly Paid</b>	<b>73</b>	<b>14</b>	<b>6</b>	<b>2</b>	<b>95</b>
Longford	0	14	0	0	14
Radford Gate	32	0	0	0	32
Private Provider	41	0	6	2	49
<b>Temporary Accommodation</b>	<b>62</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>62</b>
A2Dominion	31	-	-	-	31
Harper House	18	-	-	-	18
Knowle Green Estates	14	-	-	-	14
<b>Total</b>	<b>136</b>	<b>14</b>	<b>6</b>	<b>2</b>	<b>158</b>

### Households without children under 18:

Local Authority	Spelthorne	Hillingdon*	Hounslow	Ealing	Total
<b>Nightly Paid</b>	<b>32</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>38</b>
Longford	0	1	0	0	1
Private Provider	32	3	1	1	37
<b>Temporary Accommodation</b>	<b>8</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>8</b>
A2Dominion	6	-	-	-	6
Harper House	1	-	-	-	1
Knowle Green Estates	0	-	-	-	0
<b>Total</b>	<b>39</b>	<b>4</b>	<b>1</b>	<b>1</b>	<b>45</b>

Local Authority:	Spelthorne	Out of Borough	Total
<b>Grand Total:</b>	<b>175</b>	<b>28</b>	<b>203</b>

\*Note that we have leased 16 houses in Longford, Hillingdon until August 2025.

### **3. Options analysis and proposal**

#### Option 1 – Approve the Placement Policy for emergency accommodation (recommended)

3.1 The draft Policy offers clear guidance to Officers when identifying suitable emergency accommodation for homeless households. In times of high demand and low supply, it provides a prioritisation criterion to enable vulnerable residents to remain within or as close to the borough as possible. This is essential when the Council is seeing increased demand for housing advice and an increase in homeless applications with subsequent need for emergency accommodation. Whilst much of the guidance is already in operation by Officers, official approval of this policy from the Committee will make it more robust and be of good practice to have formalised.

#### Option 2 – Do not approve the proposed Policy

3.2 If the draft Policy is not approved, housing legislation still requires the Council to ensure the suitability of interim accommodation provided. This includes considering the applicant's needs and location. For example, families with dependent children or a pregnant woman within the household should only be placed within shared accommodation for a maximum of 6 weeks where no alternative accommodation is available. Without formal approval, the Council could be at risk of being challenged when making placement decisions as Officers will not have an official policy to refer to.

#### Option 3 – Approve the Placement Policy with amendments made by the Committee

3.3 If the Committee broadly agrees with the Policy proposed but wishes to make some additional suggested amendments, option 3 could be considered. However, the existing version collated is recommended by Officers.

### **4. Financial management comments**

4.1 Emergency accommodation is a costly expense to the Council and is in high demand. Having a policy in place which outlines the priority of how placements will be made will enable the Council to retain some units when needed. Some units may be kept available for particularly vulnerable residents that may otherwise be costly to place further afield if there was nothing suitable available locally. For example, where an applicant has medical needs and may require ground floor self-contained accommodation with adaptations or where a family with dependent children requires self-contained accommodation that does not have shared facilities.

### **5. Risk management comments**

5.1 If Option 2 is chosen by Committee, there is a risk that if the Council were to be challenged by a Court on an emergency accommodation placement decision, the Council will not have a policy to refer to. This risk would be somewhat mitigated by the relevant legislation that has to be considered when making a placement. However, approval of option 1 would be a

preferred outcome to ensure that the Council has a more robust process in place that guides consistent decision making.

**6. Procurement comments**

6.1 Not applicable.

**7. Legal comments**

7.1 No comments received.

**8. Other considerations**

8.1 This policy will be reviewed every 5 years and monitored by Strategic Housing Group. Strategic Housing Group is made up of senior Officers from several departments as well as the Deputy Chief Executives and the Chair and Vice Chair of the Community Wellbeing and Housing Committee.

**9. Equality and Diversity**

9.1 A full equality and diversity impact assessment has been undertaken and provided in Appendix B.

**10. Sustainability/Climate Change Implications**

10.1 None identified.

**11. Timetable for implementation**

11.1 Following a Strategic Housing Group meeting in August 2024, it was agreed with the Chair and Vice Chair of the Committee for Officers to use the policy as guidance with immediate effect. This was to prevent any delay until the policy could be formerly considered by the Committee.

**12. Contact**

12.1 [HousingStrategy@spelthorne.gov.uk](mailto:HousingStrategy@spelthorne.gov.uk)

**Background papers:**

[Equality and Diversity Impact Assessment.pdf](#)

**Appendices:**

Appendix A: Placement Policy – Emergency Accommodation