

# Customer Access Review – Full Assessment

<b>Assessment details</b>	
<b>Assessment area</b>	Temporary Accommodation Strategy
<b>Date of assessment</b>	28 April 2022
<b>Directorate and Service</b>	Housing and Public Protection, Housing Services
<b>Manager</b>	Housing Solutions & Private Sector Manager
<b>Officer conducting assessment</b>	Senior Housing Policy & Performance Officer
<b>Step 1: Scoping the assessment</b>	
<b>1. What are the aims and objectives of the activity or proposal?</b>	<p>The aim of the draft Temporary Accommodation Strategy is to set out the Council’s approach to procuring temporary accommodation now and in the future for homeless households, including the potential demand, the challenges in procuring accommodation, and how existing options and schemes could be maximised to ensure that the service and provision of accommodation is future proofed.</p> <p>The Strategy will be delivered by three strategic objectives:</p> <ol style="list-style-type: none"> <li>1. Temporary accommodation is procured at a fair price; costs are driven down whilst value for money is achieved</li> <li>2. The provision of temporary accommodation is sufficient to manage demand and to meet homelessness duties</li> <li>3. Temporary accommodation is suitable, compliant with health and safety specifications and in a decent condition</li> </ol>
<b>2. Who will be affected by the activity or proposal?</b>	The draft Temporary Accommodation Strategy affects homeless households and private sector landlords who procure their properties for temporary accommodation.
<b>3. How does the activity or proposal contribute to: a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?</b>	<ol style="list-style-type: none"> <li>a) The draft Temporary Accommodation Strategy relates to the Corporate Plan performance indicator HPI 16 - Number of homeless applicants placed in Temporary Accommodation</li> <li>b) The draft Strategy contributes to the Corporate Plan Housing strategic aim to ‘facilitate quality, choice and diversity in the housing market, assist in meeting housing need in Dartford and deliver high quality services to service users’.</li> </ol>
<b>4. Which aspects of the activity or proposal are dictated by legislation/regulation and</b>	There are various section of the Housing Act 1996 (as amended) and the Homelessness Reduction Act 2017 to secure temporary accommodation for homeless households in certain circumstances:

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Step 1: Scoping the assessment	
<p><b>where do we have discretion in how they are delivered?</b></p>	<ul style="list-style-type: none"> <li>• S.188 – the duty to provide temporary accommodation to anyone the Council has reason to believe may be homeless and may be in priority need</li> <li>• S.190 – in the event of an adverse decision, the Council has a duty to provide temporary accommodation for a reasonable period of time in order to give clients the opportunity to make their own arrangements</li> <li>• S.193 – following acceptance of the main housing duty, the Council is required to continue to provide temporary accommodation until suitable, alternative accommodation can be found</li> </ul> <p>In addition to households applying to the Council for accommodation under homelessness legislation, other households can require temporary accommodation. This includes people who are rough sleeping, people who require emergency accommodation due to risk of fire or flood etc., and Council tenants who are being decanted due to major repairs or remodelling works to their homes.</p> <p>Shorter-term accommodation is nightly paid accommodation during the relief stage of homelessness and whilst a household’s homelessness application is being assessed. This could be self-contained or shared accommodation. The Council does not place homeless households into shared accommodation unless it is absolutely necessary.</p> <p>Longer-term accommodation is for households where the Council has accepted an ongoing accommodation duty. This accommodation is provided under a license until a suitable offer to discharge that duty can be made through the household securing accommodation either in social housing stock or the private rented sector. The accommodation is provided through the Council’s Dartford Private Leasing Scheme under leasing arrangements with local landlords.</p> <p>Accommodation must always be ‘suitable’ and there are particular matters the Council must have regard to when determining suitability, including space and arrangement, location, property condition, and social considerations relating to the applicant and their household.</p> <p>The Homelessness (Suitability of Accommodation) (England) Order 2003 and how B&amp;B accommodation is not considered suitable for families with children and households that include a pregnant woman, except where there is no other accommodation available, and then only for a maximum of 6 weeks.</p>

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Step 2: Information collection		
<p><b>5. What do you know about the groups of people who will be affected?</b> (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)</p>	<p>As a snap shot from the most recent quarterly return to Government on the Dartford Borough homelessness statistics, the following demographic information is known about homeless applicants (Source: Statutory homelessness: Detailed local-authority level tables, Department for Levelling Up, Housing &amp; Communities)</p>	
<p><b>Age of main applicant assessed as owed a prevention or relief duty (Jul - Sep 21)</b></p>		
16-17		2%
18-24		18%
25-34		38%
35-44		18%
45-54		10%
55-64		10%
65-74		3%
75+		2%
<p>Totals may not equal the sum of components because of rounding</p>		
<p><b>Ethnicity of main applicants assessed as owed a prevention or relief duty (Jul - Sep 21)</b></p>		
White		69%
Black / African / Caribbean / Black British		22%
Asian / Asian British		6%
Mixed / Multiple ethnic groups		1%
Other ethnic group		0%
Not known		3%
<p>Totals may not equal the sum of components because of rounding</p>		
<p><b>No. of households owed a homelessness duty by sexual identification of lead applicant (Jul - Sep 21)</b></p>		
Heterosexual / Straight		115
Homosexual / Gay/Lesbian)		1
Other		1
Prefer not to say		3
Not known		0

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Step 2: Information collection																													
	<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th colspan="3" style="text-align: left;">No. of households in temporary accommodation by household composition (Sep 21)</th> </tr> </thead> <tbody> <tr> <td style="width: 70%;">Couple with dependent children</td> <td style="width: 20%;"></td> <td style="width: 10%; text-align: right;">16%</td> </tr> <tr> <td>Male single parent with dependent children</td> <td></td> <td style="text-align: right;">3%</td> </tr> <tr> <td>Female single parent with dependent children</td> <td></td> <td style="text-align: right;">36%</td> </tr> <tr> <td>Other / gender not known single parent with dependent children</td> <td></td> <td style="text-align: right;">0%</td> </tr> <tr> <td>Male single adult</td> <td></td> <td style="text-align: right;">21%</td> </tr> <tr> <td>Female single adult</td> <td></td> <td style="text-align: right;">15%</td> </tr> <tr> <td>Other / gender not known single adult</td> <td></td> <td style="text-align: right;">0%</td> </tr> <tr> <td>All other household types</td> <td></td> <td style="text-align: right;">9%</td> </tr> </tbody> </table>		No. of households in temporary accommodation by household composition (Sep 21)			Couple with dependent children		16%	Male single parent with dependent children		3%	Female single parent with dependent children		36%	Other / gender not known single parent with dependent children		0%	Male single adult		21%	Female single adult		15%	Other / gender not known single adult		0%	All other household types		9%
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<p><b>6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings</b></p>	<p>See question 7 for details of future engagement work planned to be carried out with service users.</p>																												
<p><b>7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?</b></p>	<p>Understanding the ‘lived experiences’ that homeless households themselves have when accessing temporary accommodation will assist in measuring the impact of their experience and identify any gaps or areas of improvement within the services provided. <b>Action: Include an action in the Temporary Accommodation Strategy to develop mechanisms to collect service user feedback.</b></p> <p><b>Action: Undertake external consultation on the draft Temporary Accommodation Strategy with partners, including temporary accommodation providers, Porchlight, Dartford Winter Shelter and other stakeholders.</b></p>																												

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## Step 3: Assessing the equality impact

8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty:

- a) tackling unlawful discrimination
- b) promoting equality of opportunity
- c) promoting good relations

NOTES:

- The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration
- For existing activities, consider how they are working in practice for each relevant protected group
- For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group
- If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9
- If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9

## Step 3: Assessing the equality impact

PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	<p><b>Shared accommodation rate</b>                      Over half (58%) of households assessed as owed a prevention or relief duty (Jul - Sep 21) are aged under 35. Of those who are single with no children living in private rented accommodation, under Local Housing Allowance (LHA) rules, they are normally assumed to be living in shared accommodation. This means the maximum amount of rent that can be used in the Housing Benefit or Universal Credit calculation is based on the cost of renting a room in a shared house or flat in their area, even if they live in a self-contained property. This can result in the LHA not covering the rent in full which means the accommodation options for single people under the age of 35 are more limited than other age groups. Although there are some exceptions</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>where a higher LHA rate can be provided. To help mitigate the impact of the shortfall, the Council's Revenues &amp; Benefits Service offer Discretionary Housing Payment (DHP) provision, which is financial support to help with a shortfall in rent or housing costs. Households will be signposted to DHP support where appropriate.</p> <p><b>Out of borough placements</b> The Council is increasingly placing homeless households into temporary accommodation outside of the borough due to shortages in the provision of accommodation in-borough. Just over half (55%) of households in temporary accommodation are families with children (as at Jul - Sep 21). If families with children have to be accommodated outside the borough, they could be potentially negatively impacted e.g. need to change schools, which can be disruptive particularly if they are at key exam stages.</p> <p>Although the proportion of older people assessed as owed a prevention or relief duty is much lower than other age groups (5% of people aged 65+ as at Jul – Sep 21), older people may potentially be negatively impacted by out of borough placements, particularly if they have long established links to the local area and also as they are more likely to receive care and support packages which would need to be transferred. Also they may be more likely to</p>			

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>receive informal support, possibly from family members, which might be harder to sustain at a distance.</p> <p>To mitigate this impact, the Temporary Accommodation Strategy contains a strategic objective to ensure that the provision of accommodation is sufficient to manage demand and to meet homelessness duties. This includes developing initiatives to procure more Dartford Private Leasing Scheme properties to assist in meeting demand and reducing the need to place households into temporary accommodation outside of the borough.</p> <p>Where it is unavoidable to place a household into temporary accommodation outside of the borough, the Housing Solutions &amp; Private Sector Team will engage the household with local support agencies. Some temporary accommodation providers will conduct welfare checks, complete signposting to local foodbanks, job centre etc. The team also engages with local schools relating to children’s schooling and can send supporting letters to request home learning.</p>			
<b>Disability</b>	<p><b>Accessible temporary accommodation</b> Accommodation must be suitable for people with disabilities. The Council has ensured that one unit of emergency temporary accommodation is suitable for a person with a physical disability. If there is a need for further accessible properties,</p>		<input type="checkbox"/>	<input type="checkbox"/>

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	<p>there is access to booking accessible hotel rooms as an interim solution. The service will work with the Allocations Team to move applicants on from temporary accommodation quickly.</p> <p><b>Provision of support for households with complex needs</b> The service has a list of providers who provide support within accommodation e.g. for people with complex needs, including mental health. Internal guidance has been produced on the type of support each provider can offer (e.g. food parcels, GP registration support etc.) to assist in ensuring suitable placements are made appropriate to the type of support offered.</p> <p><b>Translation and alternative format service</b> In accordance with the Council's Equality &amp; Diversity Document Framework, information about homelessness and temporary accommodation services can be provided in alternative formats, including: Braille, audio tape and large print versions of documents. British Sign Language interpreting services can be provided upon request. Calls can also be received via Relay UK.</p>			
<b>Sex</b>	The highest proportion of household types in temporary accommodation were female single parents (36%) followed by male single adults (21%) (Jul – Sep 21). The Temporary		<input checked="" type="checkbox"/>	<input type="checkbox"/>



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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	Accommodation Strategy contains a strategic objective to ensure that the provision of accommodation is sufficient to manage demand and to meet homelessness duties. This includes developing initiatives to procure more Dartford Private Leasing Scheme properties to assist in meeting demand.			
<b>Gender reassignment</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Race</b>	<b>Translation and alternative format service</b> In accordance with the Council's Equality & Diversity Document Framework, information about homelessness and temporary accommodation services can be provided in alternative formats, including: documents translated into other languages. Telephone and face-to-face language interpreting can be provided upon request.		<input type="checkbox"/>	<input type="checkbox"/>
<b>Religion/Belief</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Sexual Orientation</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>
<b>Pregnancy/Maternity</b>	Access to sufficient temporary accommodation should ensure that the Council does not need to temporarily house pregnant women in B&B accommodation.		<input type="checkbox"/>	<input type="checkbox"/>
<b>Marriage and Civil Partnership*</b>			<input checked="" type="checkbox"/>	<input type="checkbox"/>

\* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

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Step 3: Assessing the equality impact	
9. If 'no impact' or 'unknown' was selected, please explain	There are no known circumstances where the Temporary Accommodation Strategy will have a disproportionate impact on protected characteristics where 'no impact' was selected. The aim of the Temporary Accommodation Strategy is to increase the supply and quality of temporary accommodation and all groups have equality of opportunity to access this.
10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	The Council works with private sector landlords and letting agents to secure temporary accommodation for homeless households. There are no known circumstances where these joint working relationships will have a disproportionate impact on equality.
11. Any other comments	None

## Step 4: Action plan

12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address:

- a) any gaps in information and consultation
- b) how any negative impacts on equality will be mitigated or eradicated

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views of service users on their experiences of temporary accommodation	Include an action in the Temporary Accommodation Strategy to develop mechanisms to collect service user feedback	Feedback will inform any improvements and/or changes to temporary accommodation services	April 2022	Through internal review	Housing Solutions & Private Sector Manager / Senior Housing Solutions Officer
Views of key stakeholder partners on the draft Temporary Accommodation Strategy	Invite views on the draft Temporary Accommodation Strategy from key partner stakeholder organisations and	Feedback will, at a formative stage, inform any further changes that may be required to the draft Temporary	May/June 2022	Details of the consultation will be included in the Cabinet report	Housing Solutions & Private Sector Manager / Senior Housing Solutions Officer

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Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
	temporary accommodation providers	Accommodation Strategy in advance of seeking approval for the Strategy			

**b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?**

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
None					

### Step 5: Decision making and future monitoring

<b>13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?</b>	Director of Housing and Public Protection
<b>14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report</b>	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<b>15. How will you continue to monitor the activity or proposal on protected characteristic groups?</b>	Quarterly statistics on homelessness, including the use of temporary accommodation, are submitted to Government.  The development of service user feedback mechanisms (as outlined as an action) will assist in monitoring the impact of the use of temporary accommodation on homeless households.
<b>16. When will you review this Customer Access Review?</b>	New assessments will be undertaken every two years in conjunction with the review of the Temporary Accommodation Strategy, or sooner, in the event of major legislative or operational changes.

### Step 6: Final steps

<b>17. Once this Customer Access Review has been approved, send this assessment to the Policy &amp; Projects Officer</b>
<b>18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded</b>

Reviewed by Legal Services: 12 May 2022

Reviewed by Director of Housing & Public Protection: 26 May 2022