

# **Homelessness Reduction Act 2017 & Future of the Developmental Pilot**

Report of the Housing and Environmental Health Portfolio Holder

## **Recommended:**

- 1. That Cabinet note Homelessness Reduction Act 2017 (HRA) compliance has been achieved and that initial evaluation of operations under the new statutory framework has been completed.**
- 2. That Cabinet note the 12-month developmental pilot approved by Cabinet in March 2018 has been implemented and embedded, demonstrating significant successes at a time of increasing demand.**
- 3. That Cabinet note experimental KPI targets will be amended for 2019/20 to reflect operational baseline experience during 2018/19.**
- 4. That Cabinet approves the Council's draft Rough Sleeping Action Plan contained at Annex 1.**
- 5. That the recommended Option 2 be approved.**
- 6. That any items shown in Annex 2 to the report, which are unspent by 31 March 2020, be approved for carry forward into the 2020/21 revenue budget.**

## **SUMMARY:**

- The Council has been operating in lawful compliance with the Homelessness Reduction Act 2017 since its commencement in April 2018.
- Compliance with the Act has been subject to an internal audit review, which confirmed in January 2019 that the Council's Housing Service is operating in compliance with the new homelessness duties.
- Prior to the new Act becoming enforceable in law, Cabinet approved a developmental pilot (in March 2018). Since April 2018, the new ways of working incorporated in the pilot approach have been embedded.
- The pilot has been subject to evaluation. The evaluation demonstrated a range of successes attributable to new ways of working, and that effective use has been made of the additional investment approved by Cabinet in March 2018. The results of this evaluation were shared with OSCOM in January 2019.

- In light of increased demand in the local area, including from single homeless people, the Housing Service has produced an initial “Rough Sleeping Action Plan”. This action plan is included at Annex 1 to this report, and sets out a specific framework of activities that will be delivered to support a proactive response to rough sleeping in the borough. It is anticipated that this initial action plan will represent an interim position, feeding into a future Preventing Homelessness & Rough Sleeping Strategy for Test Valley from 2020.
- The Ministry for Housing, Communities and Local Government (MHCLG) provides funding to support the Council to meet its homelessness duties. This report sets out how ring fenced funding could continue to be targeted, to support the Council to respond proactively to identifiable pressures while minimising homelessness and rough sleeping.
- The report recommends the Council continues to invest in new ways of working. The measures implemented as part of the pilot have proved to be effective and transformational, and have contributed to the Council’s ability to deliver HRA compliant services whilst managing demand and preventing and relieving homelessness.

## **1 Introduction**

- 1.1 On 14 March 2018, Cabinet approved a new Preventing Homelessness Strategy Action Plan along with an associated 12-month ‘developmental pilot’ in Housing Services.
- 1.2 These considerations were timed to coincide with implementation of the Homelessness Reduction Act 2017. The majority of provisions in this new Act came into force in April 2018, with the new “Duty to Refer” provision (affecting specified public bodies) coming into force later in the year, on 1 October 2018.
- 1.3 Since April the Housing Service has transformed the way it works with people to prevent and tackle homelessness, and as part of this process, has embedded the developmental approach into day to day operations.
- 1.4 An audit and an evaluation have demonstrated lawful compliance with the new statutory framework and a range of successes. Both these reviews evidence the effectiveness of new ways of working.
- 1.5 To build on this transformation, and having due regard to the government’s Rough Sleeping Strategy, the Housing Service has produced a draft Rough Sleeping Action Plan (Annex 1). This acknowledges increases in single homelessness locally and seeks to further enhance the local response to homelessness, building on the work of the pilot.
- 1.6 Government funding to support our work to prevent and tackle homelessness includes funding to help the Council to meet identifiable “new burdens”.

- 1.7 This report sets out options for the future delivery of the Housing Service. This includes proposing that the Council continues to invest in the pilot ways of working, albeit acknowledging that the developmental aspects of transition have now taken place.

## **2 Operational Context**

- 2.1 Since April 2018, the number of households presenting as homeless or threatened with homelessness has increased by approximately 17% compared with the same time last year. The number of people presenting at the front desk with *any* housing related problems (including those relating to the Housing Register and Hampshire Home Choice) at Beech Hurst and the Romsey FMC, demonstrates a 44% increase overall compared with the number of approaches we experienced in the preceding 8 months before the introduction of the Homelessness Reduction Act.
- 2.2 The new demands notably include an increase in the number of single people presenting for assistance who have highly complex needs, including addiction and mental health related challenges.
- 2.3 In November 2018, the Council reported its official rough sleeper estimate to the MHCLG. 9 individuals were identified to be sleeping rough. This represented a significant increase on the 2017 estimate when a total of 2 rough sleepers were reported. This increase occurred despite the Council seeking to support anyone with emergency accommodation, regardless of priority need, where they may otherwise sleep rough.
- 2.4 The level of “new” demand has impacted on delivery; however, a new operating model has been embedded successfully. It is likely that without the new approach and increased investment in the service, the Council may have seen an even bigger increase in rough sleeping locally and also, potential increases in statutory homelessness and temporary accommodation.
- 2.5 The Council committed £41,250 from ring-fenced government Flexible Homelessness Support Grant Funding in 2017/18 to bolster the housing team staffing complement by 2 FTEs, and a further £59,860 in 2018/19. This additional resource has been invaluable to facilitate meeting all relevant obligations under the new Act, which significantly increased the administrative burden on the Council.

## **3 Operational Compliance with the HRA 2017**

- 3.1 To date, and despite a significant increase in the number of ‘challengeable’ decisions that now exist in the new statutory framework, no legal challenges have been received from customers or their advocates. We have not received any formal requests to review our homelessness decision-making under section 202 of the Housing Act 1996 (as amended) since the HRA2017 came into effect, and we have received very few complaints from customers.
- 3.2 The service is geared towards preventing and relieving homelessness, delivering sustainable solutions for people, reducing repeat homeless presentations, reducing statutory homelessness acceptances, temporary accommodation and bed and breakfast use, and tackling rough sleeping.

3.3 In addition to operating in compliance with the new statutory framework, we have also delivered asset-based (or strengths-based) assessments for our customers and actively worked to engage our stakeholders to build on this approach. This includes actively encouraging the wider system to contribute to new ways of working and to develop a shared sense of responsibility for tackling homelessness.

#### **4 Baseline Delivery Methods included in the Pilot:**

4.1 Underpinning the pilot, a set of baseline delivery methods have been used to support the Council to develop its approach to preventing and tackling homelessness and ensure compliance with the new Act.

4.2 These baseline initiatives should be considered integral aspects within each of the options set out later in the report. The baseline delivery methods include:

- i. Using data and local intelligence to profile local cohorts most likely to become homeless.
- ii. Developing a new model of service delivery based on the principles of 'engagement' and 'support'.
- iii. Moving towards an "asset based" approach to helping people, focusing on customer aspirations, capabilities, interests and strengths, and seeking to influence them accordingly.
- iv. Providing all customers with "personalised housing plans".
- v. Meeting emerging training needs of key front line staff and managers.
- vi. Engaging and influencing the wider system of public services to play a more active role in identifying and supporting people at risk of homelessness.
- vii. Adopting a "universal" service that aims to help as many people as possible, in the interests of preventing rough sleeping.
- viii. Introducing change interventions that go beyond housing, with support from partners.
- ix. Developing appropriate systems and data sets to measure and evaluate success, including future key performance indicator target setting based on learning throughout the process. 2019/20 targets will be set using the operational experience of 2018/19 and using national data to 'sense check' them.
- x. Developing place based solutions, engaging participants from a diverse range of sectors in collaborative working.
- xi. Engaging service users and stakeholders.

#### **5 Additional Investment**

5.1 Alongside the baseline delivery methods above, Cabinet approved additional investment of £57K in March 2018.

5.2 This investment involved targeting ring-fenced government funding for homelessness to support the service in the following ways:

- £9K to support developing the ICT system to ensure case and statistical recording supported legal compliance. This £9K represented a one off grant from MHCLG for this purpose.

- £15K to support a Flexible Homelessness Prevention Fund to enable officers to target payments to prevent homelessness.
- £13K to support a Multi-Agency Task & Targeting (MATT) Fund to be used flexibly at the Housing Manager's discretion, on an "invest to save" basis, to complement approaches that exist in the Supporting Families Programme and to encourage referrals from other agencies in the interests of preventing homelessness.
- £5K to support a Single Homelessness Fund to support the Housing Service to meet the Council's commitment to making offers of emergency accommodation to local people who would otherwise sleep rough.

5.3 Additionally, Cabinet approved the use of £15K from the Council's "Special Projects Reserve" to support the following:

- £10K to support a Prototyping Fund that would develop new initiatives in partnership to prevent and relieve homelessness.
- £5K to meet a range of emerging training needs arising from the new legislation and to support the transition to new ways of working.

## **6 Impact of the Homelessness Reduction Act & Developmental Pilot**

6.1 Homelessness data sets collected pre and post HRA are not the same. However, if we consider homelessness prevention and statutory homelessness activities in the round, the following conclusions are reasonable despite the differences between the 2 legal frameworks:

- The administrative burden on staff has increased significantly, including both the requirements of the new Act and the level of increasing demands on the front line of the service.
- The number of households presenting as homeless or threatened with homelessness has increased by approximately 17% since April 2018.
- Targeted prevention activity has resulted in 180 households being secured accommodation or enabled to remain in their current accommodation, who would otherwise have been homeless.
- Targeted homelessness relief activities resulted in 86 households securing alternative accommodation who were homeless.
- Statutory homelessness acceptances (those owed the main housing duty) have decreased by 88%.
- Numbers in temporary accommodation have reduced by 33% since April 2018.
- 50 households have been placed into B&B this year, compared with 31 in 2017/18.
- The Council's official 2018 autumn rough sleeping estimate increased to 9 from the 2 reported in the 2017 estimate.

6.2 At the start of the financial year 2018/19 experimental KPIs and associated targets were set without baseline data to inform them. This was because the statutory framework from April 2018 was entirely new.

6.3 These targets will be adjusted for 2019/20, to take account of operational experience.

6.4 Whilst not all targets were achieved, in some instances the Council hugely outperformed what was thought to be possible. The table below sets out current performance against experimental KPIs, and indicates likely new targets for the coming financial year 2019/20.

KPI	2018/19 Performance to Date	National Data	2019/20 Targets
<b>85% of customers receive asset-based assessments</b>	78%	N/A	80%
<b>80% of all cases triggering the "prevention" duty are resolved at that stage</b>	64%	64%*	65%
<b>80% of all cases triggering the "relief" duty are resolved at that stage</b>	89%	57%**	90%
<b>20% reduction in numbers of statutory homeless "main duty" acceptances</b>	88% reduction	50%***	20% (see 6.5 below)
<b>10% reduction in the number of households in temporary accommodation (provided under a duty)</b>	33% reduction	+5% increase****	10% (see 6.5 below)
<b>50% reduction in levels of rough sleeping (2 identified Nov 2017)</b>	9 identified Nov 2018 estimate.	2% reduction nationally*****	<2 people estimated to be rough sleeping autumn 2019

\*National data on households whose prevention duty ended between 3<sup>rd</sup> April and 30<sup>th</sup> June 2018 who had secured their existing or alternative accommodation for at least 6 months

\*\*National data on households whose relief duty ended between 3<sup>rd</sup> April and 30<sup>th</sup> June 2018 who had secured accommodation for at least 6 months

\*\*\*National statistical comparison between April to June 2018 and January to March 2018

\*\*\*\*National statistical comparison between 30<sup>th</sup> June 2017 and 30<sup>th</sup> June 2018

\*\*\*\*\*National statistical comparison between official rough sleeping counts and estimates in autumn 2017 and those reported in autumn 2018

6.5 The Council has achieved positive outcomes with prevention and relief activities, including a huge impact on the number of households who are now being owed the main housing duty, and on the number of households in temporary accommodation under a duty. In the context of an 88% reduction in main duty statutory homelessness acceptances, and a 33% reduction in the number of households residing in temporary accommodation; this level of reduction will not be sustainable moving forward in either context. At this stage, future KPI targets for these indicators next year will remain under review but it may be sensible to maintain them at the present level. This is while we continue to understand trend data and the realistic potential for continued impacts in those areas.

6.6 Based on indicative comparisons included in the table above, Test Valley has matched the national performance in the context of resolving cases under the prevention duty, but significantly exceeded national performance in terms of resolving people's situations who were actually homeless at the point of presentation. Similarly, the Council outperformed in the areas of reducing main duty acceptances, and reducing the number of households residing in temporary accommodation.

- 6.7 Despite resolving a high proportion of relief duty cases (in 89% of cases where people were actually homeless at the point they presented to the Council for help), we have reported a significant increase in rough sleeping. This may seem counter intuitive without the earlier context that overall service demand has increased, including a significant cohort of vulnerable single people facing homelessness.
- 6.8 In this context, Annex 1 has been developed to set out an initial action plan to inform the Council's approach to tackling rough sleeping in the borough. This has been developed to reflect the proactive multi-agency approach that has been adopted locally during 2018 and to set out actions that will support the Council to build on this in the coming year.
- 6.9 At the time of writing, the Housing Service is aware of 4 people sleeping rough in Test Valley. This significant reduction from the autumn estimate of 9, has been achieved as a direct result of the Council's commitment to maintaining low levels of street homelessness whilst exploring how it can effectively end rough sleeping in the borough by developing no first night out approaches.

## **7 Funding**

- 7.1 Of the £57K Cabinet agreed to invest in new initiatives in March 2018, £41,000 has been spent as at 1 February 2019. We anticipate all allocated funding will be spent in 2018/19. Spend to date has included:
- a) Enabling 7 households in financial difficulties with their rent and who would otherwise have been homeless, to remain in their current accommodation.
  - b) Assisting 12 households through the Single Homelessness Fund with emergency bed and breakfast accommodation.
  - c) Enabling new projects that have worked with a total 36 households at risk of homelessness, helping them to access and sustain accommodation and support services, plus assisting an additional 10 single men to undertake pre-tenancy training.
  - d) All housing options staff have participated in an ongoing suite of training to upskill them to deliver the HRA and innovative new ways of working.
  - e) The Multi-Agency Task and Targeting fund has supported 5 households thereby preventing them becoming homeless.
- 7.2 We can demonstrate from these aspects of the pilot that 70 households had been directly supported by the additional investment between April 2018 and February 2019. Whilst many more households have benefited from the investment indirectly as part of the pilot itself, these 70 households were supported at an average cost of £585 each. This is considerably lower than the costs associated with 70 households experiencing homelessness.
- 7.3 Some elements of the pilot funding have been oversubscribed and delivered a range of tangible outcomes that have contributed to the overall positive performance, while others have been less well utilised. Moving forward, and as set out in the options appraisal below, it is recommended that the investment is continued, giving flexibility so that the Housing Service is empowered to proactively target the use of the funding between priority areas.

## 8 Funding and Investment:

- 8.1 The Council has received two 'ring fenced' funding streams from MHCLG to assist with homelessness.

### a) New Burdens Funding

This funding has been provided by government in recognition of increased administrative burdens associated with implementing the Homelessness Reduction Act. The funding is time limited (3 years) and has been used to fund the homelessness developmental pilot in 2018/19.

	2017/18	2018/19	2019/20
<b>New Burdens Funding</b>	£33,000	£30,400	£32,000

### b) Flexible Homelessness Support Grant (FHSG)

The Council has received 3 years FHSG determination up to and including financial year 2019/20. Indications from MHCLG are that this funding will continue, and continue to be ring fenced, yet we have no *certainty* after 2019/20 at the time of writing. As referenced earlier in this report, the FHSG currently funds two Housing Options Officers to assist with new duties under the Homelessness Reduction Act.

	2017/18	2018/19	2019/20
FHSG	£ 168,124	£194,446	£201,000
Funding of Two Housing Options Officer	£41,250*	£59,860	£61,700
Top up for HRA pilot			£17,600
<b>Uncommitted Budget</b>	<b>126,874</b>	<b>£134,586</b>	<b>£121,700</b>

*\*Appointed August 2017 and pro rata for 8 months of 2017/18*

- 8.2 The recommendations of this report fit within the envelope of the existing service budget and that of the ring fenced central government funding for homelessness, including New Burdens and Flexible Homelessness Support Grant.
- 8.3 To deliver the service at the current capacity and maintain performance, an ongoing call must be made on the Flexible Homelessness Support Grant.
- 8.4 The future use of the Flexible Homelessness Support Grant is also relevant to the future of social inclusion services in Test Valley, in light of the County Council's T19 review and its associated decision to reduce investment in this area. This will be reported separately along with its implications for the Borough Council.

## 9 Corporate Objectives & Priorities

- 9.1 Preventing and tackling homelessness is a priority for Test Valley Borough Council.



- 9.2 The Council is committed to putting residents' needs and their experience at the forefront of its thinking, and across a range of priority areas, building on principles such as meeting basic need to include employment, homes, and a supportive community. The Corporate Plan priorities of Live, Work, Enjoy and Contribute embody these aims with an increasing emphasis on investing in Test Valley to ensure it is a great place to live.
- 9.3 The emerging priorities for the Council, as part of the development of a new Corporate Plan, continue to emphasise the importance of supporting vulnerable people and helping people to secure settled homes. This has been borne out through resident consultation and is likely to remain one of a core set of priorities for the Council when looking to the future.
- 9.4 The recent transformation in Test Valley's approach to preventing and relieving homelessness, dovetails with these ambitions.
- 9.5 Homelessness Reduction Act compliance has been a key action in the Corporate Action Plan alongside adopting a new operating model. The recommendations in this report seek to complement this and set out future plans in this wider strategic context.
- 9.6 Feeding into the Council's corporate aims, the Preventing Homelessness Strategy sets out a delivery plan to support the Council to build on its successes and meet new challenges. This report includes an interim Rough Sleeping Action Plan which will be delivered alongside and with regard to the Preventing Homelessness Strategy.
- 9.7 Housing and homelessness remain at the top of the national policy agenda, with a new national Rough Sleeping Strategy published in August 2018 and an ongoing emphasis on the importance of preventing homelessness and the role of local authorities in leading their communities to effectively deal with homelessness pressures.

## **10 Consultations/Communications**

- 10.1 Operational staff have been engaged in the developmental pilot and consulted about potential implications of the recommendations contained within this report.
- 10.2 Throughout the course of the developmental pilot, key elected members have been consulted and involved in steering the direction of travel.
- 10.3 Senior managers, including Heads of Service across the Council, have been consulted.
- 10.4 In addition, a number of key stakeholders have been consulted and involved in the development of the Council's approach to tackling homelessness and rough sleeping.
- 10.5 An initial Service User Focus Group has been undertaken which was supportive of the new ways of working delivered through the pilot and further service user engagement is planned.

10.6 The Council will be undertaking a review of homelessness during 2019 and hence consultation and stakeholder engagement will continue throughout the year.

## **11 Options Appraisal**

11.1 The developmental pilot has been transformational, yet we are on a journey. The transformation must continue if we are to effect lasting change in the wider system and maximise our potential to prevent and relieve homelessness effectively.

11.2 In this context there are 2 options that have been identified for consideration. Please note both options should be considered to be inclusive of the baseline elements outlined earlier in section 4 of this report:

### **Option 1: To maintain the baseline service delivery, but cease funding the pilot.**

11.3 In light of the increase in demand for Housing Services, this option is not realistic. The Housing Service would be unable to fund 2 FTE posts in the service that support our front line work, and we would no longer be able to fund the initiatives that have been discussed in the body of this report.

11.4 It is likely the Council would be unable to meet statutory requirements contained in the Homelessness Reduction Act, and the loss of resources may result in increased levels of homelessness, bed and breakfast and temporary accommodation use, and rough sleeping.

11.5 The majority of funding to support the pilot was taken from ring-fenced central government funding. This funding cannot be redirected to other areas of activity or to support any specific pressures to the General Fund. The pilot has represented a relatively negligible (£15k) pressure on the Special Projects Reserve, but the outcomes that have been achieved from this funding have been highly positive, directly contributing to our demand management whilst preventing homelessness and rough sleeping. It should be noted that Option 2 below, no longer seeks a contribution from the Special Projects Reserve and is contained within the New Burdens funding and Flexible Homelessness Support Grant funding.

### **Option 2: Continue to fund the pilot approach, making it 'business as usual'**

11.6 Option 2 would see the continuation of funding for 2 x FTE Housing Options Officers from the Flexible Homelessness Support Grant (£61,700) to meet high demand and the new legislative burden. The following will be funded from New Burdens Funding and a top up from Flexible Homelessness Support Grant.

- £18K for a flexible Homelessness Prevention Fund
- £5K for a Multi-Agency Task & Targeting Fund
- £5K for a Single Homelessness Fund
- £17.5K for Prototyping Fund
- £2.5K to meet identified training needs

- 11.7 The funding presently identified in the list of bullet points above represents a £9K reduction in the total funding level approved by Cabinet in March 2018. We will continue to monitor spend and seek to make best use of the Council's investment during 2019/20.
- 11.8 Option 2 would facilitate ongoing legal compliance and demand management, whilst representing a local investment in system change targeted at developing the self reliance of individuals and families presenting to the Council for assistance.
- 11.9 Whilst this option has been expressed as a straightforward continuation of the same approach taken in March 2018, Cabinet is being asked to consider making minor adjustments to the scope of specified pools of funding.
- 11.10 To provide for flexibility and agility in the use of the funding, the future recommendation associated with Option 2 is for the Housing Service to exercise discretion in targeting the funding between the named budgets in 11.6 above, depending on emerging pressures, take up, and demand, to ensure best use is being made of this important resource. The indicative, anticipated, spending profile as outlined in the bullet points in paragraph 11.6 may be subject to change during the year dependent on emerging demands but kept within the overall level of funding proposed.
- 11.11 In addition to the funding recommendations set out in Option 2, a draft Rough Sleeping Action Plan has been included at Annex 1. This action plan will support Test Valley to respond to the needs of single people experiencing homelessness, and has been drafted in the interests of preventing and relieving rough sleeping. It is requested that Cabinet consider this action plan with a view to approving it as a working interim document for the Housing Service moving forward, pending a new Preventing Homelessness & Rough Strategy from 2020 onwards.
- 11.12 Option 2 is recommended to Cabinet. It will facilitate the developmental approaches becoming 'business as usual' and the ongoing transformation journey in the context of our work with customers and with the wider system. The budget has been identified within the envelope of ring-fenced homelessness funding from government, and the Rough Sleeping Action Plan associated with Option 2 has been designed to focus our work so that we maximise the potential to prevent rough sleeping, and to reduce the likelihood that anyone will spend an extended period sleeping rough in the area, should they find themselves on the street.

## **12 Risk Management**

- 12.1 A risk assessment has been completed in accordance with the Council's risk management process and has identified significant (Red or Amber) risks as detailed in the risk assessment. The required actions proposed to reduce these risks will incur additional control costs/insurance as outlined in the Resource Implications section of this report.

- 12.2 This report, and the associated recommendations, has been produced in the interests of minimising the risks associated with non-compliance with the Homelessness Reduction Act, and in the interests of investing in a model that will be subject to monitoring and evaluation. This will further contribute to reducing identifiable risks.

### **13 Resource Implications**

- 13.1 The Council has been awarded two additional streams of funding by the MHCLG. New Burdens Funding and Flexible Homelessness Support Grant (FHSG). Both are ring fenced for homelessness prevention.
- 13.2 The New Burdens Funding is to assist local authorities in meeting the administrative burdens of the Homelessness Reduction Act 2017. Allocations are 2017/18 (£33k), 2018/19 (£30k) and 2019/20 (£32k). This funding is time limited and will cease in 2019/20.
- 13.3 The grant allocation for the Flexible Homelessness Support Grant is an initial three year period, 2017/18 (£168k), 2018/19 (£194k) and 2019/20 (£201k). Indications from MHCLG are that this funding will continue, and continue to be ring fenced, yet we have no *certainty* after 2019/20 at the time of writing.
- 13.4 The Council has already committed £59,860 in this financial year and £61,700 (2019/20) funding from Flexible Homelessness Support Grant to fund 2 FTE Housing Options Officers until April 2020. This will support the Council to meet all the relevant obligations under the Homelessness Reduction Act.
- 13.5 The Flexible Homelessness Support Grant has a residual £134,586 in this year's allocation and £121,700 in 2019/20. The FHSG should be considered in the context of the Hampshire County Council ('T19') Social Inclusion Review, which will be subject to a further report to Cabinet in April 2019.
- 13.6 The proposals in Option 2 will be funded through the New Burdens Funding, and a top-up from the Flexible Homelessness Support Grant of £17,600 in 2019/20. The funding (and implications stemming from recommendations in this report) has been included in Annex 2.
- 13.7 The options included in this report, have been set out with due regard to forthcoming changes to social inclusion services in Test Valley. These changes, and recommendations regarding the Council's response, will be reported separately. It is anticipated a report will be brought to Cabinet in April.

### **14 Legal Implications**

- 14.1 The Council has statutory duties to assist those who are homeless or threatened with homelessness and must comply with the Homelessness Reduction Act 2017. The recommended option will support legal compliance.

### **15 Equality Issues**

- 15.1 An Equalities Impact Assessment (EQIA) has been completed with regard to the recommendations of this report and issues arising.

- 15.2 The Council radically changed its working practices in 2018 to meet legal obligations and to go beyond what is required of us in law in the interests of preventing and relieving homelessness. This included providing services to a wider group of customers, whilst focusing on those at highest risk.
- 15.3 Given the rural nature of Test Valley this presents additional challenges and the EQIA has identified a potential for discrimination or adverse impact around social inclusion. The new innovative and inclusive model has demonstrated that through new ways of working, all opportunities to promote equality are being taken. The recommendations contained in this report do not create any new equalities concerns above and beyond those identified in March 2018.

## 16 Other Issues

- 16.1 The Council will continue to seek to work in partnership with the wider network of public services to develop a shared sense of responsibility for homelessness.
- 16.2 All wards and communities are affected by the recommendations.

## 17 Conclusion and reasons for recommendation

- 17.1 The legal framework radically changed in April 2018 and the Council has been proactively administering a range of new duties to help and support people who may be homeless or face homelessness.
- 17.2 At the same time, the Council's Housing Service has experienced significantly increasing demand for advice and assistance, including from people who are owed duties under the new statutory framework.
- 17.3 The recommendations within this report are intended to facilitate ongoing legal compliance and improved service delivery, through the adoption of a costed approach to investment using ring fenced government grants, and through the endorsement of a more explicit strategic approach to preventing and tackling rough sleeping in the local area.

<u>Background Papers (Local Government Act 1972 Section 100D)</u>			
None			
<u>Confidentiality</u>			
It is considered that this report does not contain exempt information within the meaning of Schedule 12A of the Local Government Act 1972, as amended, and can be made public.			
No of Annexes:	2	File Ref:	N/A
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Report to:	Cabinet	Date:	13 March 2019