

Cabinet 11 February 2014

Policy to Discharge Homelessness Duties through the Private Rented Sector (Feb14/19)

1. Summary and reasons for recommendation

1.1 The Localism Act 2011 gave Local Authorities the power to discharge their duty to secure accommodation for homeless applicants by way of arrangements with the Private Rented Sector, without the agreement of the applicant and providing it is a 'suitable' offer. Currently the Council is restricted to discharging its duties in to Social Housing. The ability to discharge in to the Private Rented Sector will:

- (a) give the Council more options to house Homeless Households;
- (b) reduce pressure on Social Housing; and
- (c) reduce pressure on Temporary Accommodation.

The policy sets out how St Edmundsbury Borough Council will apply the legislation.

2. Recommendation

2.1 It is **RECOMMENDED** that subject to the approval of full Council, the Policy to Discharge Homelessness Duties through the Private Rented Sector, as contained in Appendix 1 to Report E273, be adopted.

Contact details

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3. Corporate priorities

- 3.1 Corporate Priority 1: 'Working together for strong, healthy and diverse communities' – this Policy is an innovative way to help find people homes and will encourage best use of homes within the Borough.

4. Key issues

- 4.1 This policy, attached as Appendix 1 to the report, will apply to all applicants where, after 1 April 2014 St Edmundsbury Borough Council (SEBC) accepts a homelessness duty irrespective of whether the applicant has been placed into temporary accommodation, is likely to be placed into temporary accommodation or is able to secure their own temporary accommodation.
- 4.2 Applicants who previously occupied a social rented tenancy and have been accepted as homeless following an application due to fleeing violence; threats of violence; or domestic abuse, will not normally be considered for a Private Rented Sector Offer, unless there is an overriding benefit to the applicant. This is to ensure that those households are not negatively impacted upon in respect of security of tenure for having to escape violence or abuse.
- 4.3 An applicant who is currently under offer, or who has an offer pending from a Registered Provider will not be considered.
- 4.4 SEBC recognises that the number of private rented sector properties within the West Suffolk area that are available for the Council to discharge their homelessness duty is unlikely to be sufficient to meet the demand from all eligible applications. Therefore, the decision to offer Private Rented Sector accommodation will be made if a suitable property is available.
- 4.5 An offer of accommodation will be affordable for the household and will be within the Local Housing Allowance Limits.
- 4.6 When considering making an offer of discharge into the private rented sector the Council will first ascertain that the property is suitable and then that it is suitable for the proposed tenant. The assessment of suitability, including an inspection of the property, will be carried out before a formal offer is made to the applicant.
- 4.7 The Policy will be communicated to homeless households at the point they make an application for assistance with accommodation. It is not necessary to communicate this policy widely to those generally seeking assistance for housing as the number of households who will be considered for housing under this policy is small - expected to be no more than 30 per year.

5. Other options considered

- 5.1 Not to introduce such a policy. However, without such a policy the Council would be unable to house homeless households in the Private Rented Sector. The lack of such a policy would limit the Council's ability to reduce pressure on demand for social housing and demand for Temporary Accommodation.

6. Community impact

6.1 Crime and disorder impact *(including Section 17 of the Crime and Disorder Act 1998)*

6.1.1 The Policy will give the Council scope to access accommodation for homeless households away from areas where they may be at risk.

6.2 Diversity and equality impact *(including the findings of the Equality Impact Assessment)*

6.2.1 The Equality Impact Assessment, attached as Appendix 2, suggests the Policy would have little impact on the equality target groups. It has been recognised that for rare cases of homeless applicants with restricted mobility discharging into a privately rented property would not be feasible and an offer of long term secure accommodation through the Housing Register would be a far more suitable means of discharging homeless duty.

6.3 Sustainability impact *(including completing a Sustainability Impact Assessment)*

6.3.1 Not applicable.

6.4 Other impact *(any other impacts affecting this report)*

6.4.1 Not applicable.

7. Consultation *(what consultation has been undertaken, and what were the outcomes?)*

7.1 Other Cambridge Sub-Regional and Suffolk District/Borough Housing Options Teams have all been consulted. All have either recently introduced such a policy or are looking to do so shortly. A protocol between authorities is to be developed to ensure that placements of homeless households out of their originating authority area are appropriate and do not have an undue adverse affect on services in the receiving authority area.

7.2 The West Suffolk Lettings Partnership is to consult with landlords at their next Landlords Forum in March 2014.

8. Financial and resource implications *(including asset management implications)*

8.1 The rent level will be affordable to the applicant. To ensure this, placements will not be made if the rent is higher than the maximum amount of housing benefit the applicant could receive, should they be completely dependant on benefits. This will make such tenancies sustainable in the longer term for homeless households and prevent them becoming homeless again through rent arrears in the future.

8.2 The Policy will assist the Council in reducing Bed and Breakfast expenditure as the Council's Homelessness Duty can be discharged in some cases before the need for temporary accommodation arises.

8.3 The Council will act as Rent Deposit Guarantor for the majority of placements. Where the tenant leaves the property and has defaulted on rent payments or has damaged the property the Council will be liable to reimburse the landlord

an amount up to the agreed Rent Deposit. Historically approximately 6% of Council Rent Deposit Guarantees default per annum. Across West Suffolk, based on an anticipated 30 placements per annum, we would expect between two and three claims to be made against the West Suffolk Lettings Partnership at a cost to the each individual Council, St Edmundsbury and Forest Heath of less than £2,000. This amount has been budgeted for and is approximately the cost of assessing and accommodating in temporary accommodation one homeless household.

9. Risk/opportunity assessment *(potential hazards or opportunities affecting corporate, service or project objectives)*

Risk area	Inherent level of risk (before controls)	Controls	Residual risk (after controls)
Sourcing sufficient properties	Medium	Priority area for the West Suffolk Lettings Partnership	Low
Financial exposure from failed tenancy claims	Medium	Monitoring of claim levels. Regular review of exposure.	Low

10. Legal and policy implications

10.1 Provision to implement such a policy was included in the Localism Act 2011.

11. Wards affected

11.1 All

12. Background papers

12.1 None

13. Documents attached

13.1 Appendix 1: Operational Policy Document – Policy to Discharge Homelessness Duties through the Private Rented Sector.

Appendix 2: Equality Impact Assessment

Housing Service Policy Document



Policy to Discharge Homelessness Duties through the Private Rented Sector

Head of Housing	Simon Phelan
Housing Business and Partnerships Manager – Policy Author	Julia Vernon
Housing Options Manager – Policy Reviewer	Tony Hobby
Implementation Date	1st April 2014
Review date	1st October 2014

1. Introduction

1.1 The Localism Act 2011 gives Local Authorities the power to discharge their duty to secure accommodation for homeless applicants by way of arrangements with the Private Rented Sector (known as “PRS”).

1.2 The introduction of this power ends the provisions to make available a “qualifying offer” of private sector accommodation which required the agreement of the applicant. Local authorities can discharge their homeless duty through an offer of a PRS tenancy, without the agreement of the applicant, providing it is a “suitable” offer.

1.3 Taking into account the prevailing housing demand and supply pressures in its area, this policy sets out how Forest Heath District Council and St Edmundsbury Borough Council (hereafter referred to as “the Council”) will apply the legislation in respect of discharging its homelessness duty into the private rented sector, so to make best use of available housing stock.

2. Legal Framework

Under S.193(2) Housing Act 1996, where the Council is satisfied that an applicant is homeless and owed a duty they must ‘secure’ suitable accommodation and ensure it is available for occupation by the applicant. The duty to secure accommodation ceases when events set out in section 193 of the Housing Act 1996 (as amended) ‘Duty to persons with priority need who are not homeless intentionally’ are achieved. Where it is not possible to immediately cease the duty by providing an offer of Social Rented Housing (A

part VI offer) the Council can provide other accommodation, which is temporary, until the duty ceases.

2.1 Section 148 Localism Act 2011, amended Section 193 Housing Act 1996 to include the offer of private sector accommodation as an option which would bring the duty to secure accommodation to an end. The duty will cease irrespective of whether the applicant accepts or refuses the offer, provided they have been informed in writing of:

2.1.1 the possible consequence of refusal or acceptance of the offer,

2.1.2 that the applicant has the right to request a review of the suitability of the accommodation, and

2.1.3 the effect of a further application to a local housing authority within two years of acceptance of the offer.

3. Applying the Policy

3.1 This policy will apply to all applicants where, after 1st April 2014, Forest Heath District Council or St Edmundsbury Borough Council accept a homelessness duty irrespective of whether the applicant has been placed into temporary accommodation, is likely to be placed into temporary accommodation or is able to secure their own temporary accommodation.

3.2 Applicants who previously occupied a social rented tenancy and have been accepted as homeless following an application due to fleeing violence; threats of violence; or domestic abuse, will not normally be considered for a Private Rented Sector Offer, unless there is an overriding benefit to the applicant. This is to ensure that those households are not negatively impacted upon in respect of security of tenure for having to escape violence or abuse.

3.3 An Applicant who is currently under offer, or who has an offer pending from a Registered Provider will not be considered.

3.4 Forest Heath District Council and St Edmundsbury Borough Council recognise that the number of private rented sector properties within the West Suffolk area that are available for the Council to discharge their homelessness duty is unlikely to be sufficient to meet the demand from all eligible applications. Therefore the decision to offer Private Rented Sector accommodation will be made if a suitable property is available.

3.5 An offer of accommodation will be affordable for the household and will be within the Local Housing Allowance Limits.

4. Suitability of Accommodation

4.1 The suitability of accommodation will be considered in two parts:

- 4.1.1 The structure and management of the property, which covers the physical condition, safety aspects and how the landlord or agent manages properties and their suitability to do so.
- 4.1.2 Suitability of the property for the tenant, which takes into consideration the individual needs of that applicant and their household, considering such factors as location, affordability and accessibility.
- 4.2 When considering making an offer of discharge into the private rented sector the Council will first ascertain that the property is suitable and then that it is suitable for the proposed tenant. The assessment of suitability will be carried out before a formal offer is made to the applicant.

4.2.1 The Structure and Management of the Property

In order to consider a property suitable to discharge its duty, the Council will require that:

- The tenancy is an Assured Shorthold Tenancy, for a period of at least 12 months.
- The property is in a reasonable physical condition
- All portable appliances provided by the Landlord, within the property, have been Portable Appliance Tested (PAT) within the last 12 months.
- There is a valid gas safety certificate in place and any items that have been failed have been suitably isolated and their in-operation will not create hazards within the property, such as risk of extreme cold or lack of suitable cooking facilities.
- Where appropriate, carbon monoxide protection has been provided.
- All adequate fire safety precautions have been taken, including mains wired fire alarms, fire protection measures where required, and compliance with fire regulations in respect of all furniture and furnishings.
- An Energy Performance Certificate (EPC) is provided.
- The landlord or agent has provided a statement confirming that they have the right to market the property for rental and that there is no restrictive covenant or other supervening legality preventing the letting of the property.
- The landlord or agent is a fit and proper person. The Council will work to the assumption that the landlord is a fit and

proper person, unless there is reason to believe that the landlord or agent has committed offences of:-

- Fraud
 - Other dishonesty
 - Violence
 - Unlawful possession and or supply of illegal or controlled drugs
 - Offences under the Sexual Offences Act 2003
 - Unlawful discrimination
 - Illegal Eviction or Harassment
-
- Where the property would fall under mandatory or additional HMO licensing, the landlord has licensed the premises.
 - The landlord or agent must not have hindered the principles of housing law, such as failing to maintain tenancies such that Public Health and Housing have been required to take enforcement action.
 - The Assured Shorthold Tenancy Agreement is a standard agreement and does not contain unfair or unreasonable terms. A copy of the tenancy agreement will be required before the tenant signs the agreement.
 - The landlord agrees to accept local housing allowance for the tenancy, irrespective of whether the tenant will be claiming Local Housing Allowance or not. This is to ensure that the property would be affordable over the duration of the tenancy should the tenant experience a change in circumstances.
 - The landlord lodges any deposit paid by the tenant into a tenancy deposit protection scheme unless the landlord uses the Councils Deposit Scheme.

4.2.2 The Applicant

The Council will carefully consider all accepted homeless applicants who qualify for consideration for Private Rented Sector Discharge. The applicant's circumstances will be considered against available properties to ensure that best use is made of suitable properties. Where a property is suitable for more than one applicant the Council will identify the applicant whose need is best met by the property in terms of;

- The location of the property in proximity to the applicant's employment. Consideration will be given to the work patterns of the applicant, the financial impact of accessing the place of employment from the property and the availability of public transport if employment requires working unsociable hours.

- Care received or provided by the applicant over and above immediate family support. Consideration will be given as to the level and frequency of care received or provided and the impact of using public transport to receive or give care.
- Educational establishments attended by the applicant and their household. In general it is deemed to be reasonable to expect a household member to change school or educational establishment. Consideration will be given to the viability of maintaining the existing educational establishment and travelling from the property. It is recognised that it may not always be appropriate to require household members in receipt of education to change educational establishments. In these circumstances careful consideration will be given to where the student is at key points in their education such as the final year before exams or where a Child has a statement which requires special educational needs to be met.
- Specialist medical treatment being received by the applicant or a member of their household. Consideration will be given to the proximity to the property of any medical facility attended on a regular basis for treatment, where treatment cannot be provided either in their home or closer to the property together with any additional costs which may be incurred through relocation further away from the treatment facility.
- Support and the well being of the household. Consideration will be given to any support received by the household which is not formalised support but which has a significant impact on the household's well being.
- Access to local services required by the household. Consideration will be given to any increased in travel arrangements or costs through relocation to the offered property.
- Size of property. The property must be suitable for the size of the household and will be assessed under the Local Housing Allowance size criteria to ensure that there is no unreasonable shortfall in rent due to under-occupation.
- The requirement for aids and adaptations to assist the applicant or a member of their household who may be disabled or have mobility issues. Consideration will be given to the feasibility of adapting the property. Where the applicant or member of their household does not presently require adaptations but there is a likelihood that they may do so in the next 12 months then the potential need for adaptation will be considered.

4.3 In the interests of creating sustainable communities and where the Council are satisfied that, in respect of an applicant, there are overriding management reasons which will not serve the interests of the applicant or the community, the Council will not exercise its power to make available to an applicant a private rented sector offer.

5. Offer Hierarchy

5.1 In some cases the Council may determine that a suitable property best meets the needs of more than one applicant, in such circumstances the accommodation currently occupied will determine which applicant is prioritised for a private rented sector offer. Accommodation currently occupied is ranked as below, where 1 is the highest priority.



1. In Bed and Breakfast
2. Own arrangements which could be staying with friends which is not permanent or other unsettled accommodation
3. In temporary accommodation where the Council has placed the applicant
4. In all other forms of temporary accommodation, eg: Refuges, Hostels.

6. Offers, Acceptances, Refusals and Reviews of Suitability

6.1 The availability of any private rented sector offer will be notified to the applicant by the Council in writing. The notification will clearly state the address, size, type and rent of the property. The applicant will be notified of the likely consequences of refusing the property and their right to request a review of the suitability of the accommodation.

6.2 Prior to notifying an applicant of the availability of any private rented sector offer the Council will complete an assessment of the suitability of the property with the applicant. An arrangement to offer the accommodation to the applicant will proceed provided the Council is satisfied that the offer is suitable for the needs of the applicant and their household.

6.3 Where the applicant refuses the private rented sector offer and there has been no change of circumstances since the assessment of suitability was completed with the applicant, the Council will cease its duty to the applicant under s.193 Housing Act 1996.

6.4 Any request for a review of suitability must be made in writing to the Housing Options Team within 14 days of the date of the notice.

7. Re-Application Following Loss of Accommodation

7.1 Under section 195A Housing Act 1996, should the applicant approach the Council as homeless within a period of two years following

acceptance of the private rented sector offer under s.193(7AA) Housing Act 1996, irrespective as to whether the approach is from the offer property or elsewhere, the Council will:

- Treat the applicant as being homeless from the date of expiry of the notice. The landlord therefore will not be required to apply to court to regain possession. The Council will confirm the validity of the notice.
- Not reinvestigate the priority need of the household as the priority need of the applicant will be retained from the date of the acceptance of a duty under 193 (2) irrespective of any change in circumstances or household composition that may affect this.
- Satisfy itself that the Applicant is eligible for assistance and did not become homeless intentionally from their last settled accommodation.

7.2 Where the applicant applies under this section and the Council accept a re-application duty, then the applicant shall be further reconsidered under this, or any successor policy, for discharge into the private rented sector.

Appendix A – Arrangements for Offer Letter

Please ask for:

Direct line:

E-mail:

Fax no:

Your ref:

Our ref:

Date: *Date*

Dear *Applicant Name*

Address of property

S193 (7AA) Housing Act 1996 – Notification of Offer of Private Rented Sector Accommodation

I am pleased to advise you that the West Suffolk Lettings Partnership delivered in partnership with Forest Heath District Council and St Edmundsbury Borough Council has made arrangements with a Private Sector Landlord to offer you the tenancy of the above property.

This offer is made because *Forest Heath District Council/St Edmundsbury Borough Council* has accepted a duty under Part 7 of the Housing Act 1996 (as amended) to secure accommodation for you. This offer discharges the Council's duty which means that we no longer have responsibility for finding you alternative accommodation.

The tenancy is offered with a fixed term of 12 months. The rent you will be charged is *£weekly rent* per week (*£monthly rent* per month). The private sector landlord is *Landlords Name*.

The Council is required to make only one offer of suitable accommodation. We are satisfied that this property is suitable based on an assessment of your housing needs and so this is a final offer which meets the requirements under S193 (7AA) Housing Act 1996.

The Council's assessment of the suitability of this property takes into account the circumstances and needs of you and your household as well as certain matters relating to the condition of the property. A copy of our checklist of suitability is attached for your information.

By accepting this offer, the Council's duty under S.193(2) Housing Act 1996 will be met. Should you re-apply for accommodation or for assistance in obtaining accommodation within two years (beginning with the date on which you accept this offer) our duty to provide you with accommodation will apply again. In such a case the Council must be satisfied that you are eligible for assistance, homeless or threatened with homelessness (and be satisfied that you have not become homeless intentionally).

This offer means that the Council will have met its requirement to secure accommodation for you. If you refuse this offer we will not

make any further offers of accommodation and you have to vacate any temporary accommodation provided.

You have a right to request a review of the suitability of the accommodation offered. Your request must be made within 21 days of the date of this letter and must state clearly the reasons why this property is not suitable. You could accept this property and still seek a review. If the review is successful, a further offer of private sector accommodation will be made. Please address your review to Housing Options Manager, Housing Service, West Suffolk House, Western Way, Bury St Edmunds, Suffolk IP33 3YU.

To arrange a viewing and sign up of this tenancy please call [\[redacted\]](#). If we do not hear from you within 2 working days of the date of this letter a member of the Housing Team will contact you to make the arrangements to start the tenancy. If we have no contact with you within 5 days of the date of this letter, we will consider that you have refused the offer, which will discharge any duty to provide you with accommodation.

Yours sincerely

Homelessness Officer

Appendix B - Accommodation Suitability Check**Accommodation Suitability Check**

(The Homelessness (Suitability of Accommodation) (England) Order 2012)

Address of property being offered			
Applicants name			
Landlords name		Rent	£ PW
			£ PCM
Matters taken into account in determining accommodation is suitable			
Affordability			
Affordable based on the households current income and any housing benefit entitlement			
Location			
Distance from St Edmundsbury / Forest Heath if outside the district			
Employment			
Caring responsibilities			
Education			
Medical facilities			
Support & well-being			
Local services			
Amenities			
Transport			
Health & Safety			
Reasonable physical condition			
Portable Appliance Testing			
Fire safety (including any furnishings)			
Carbon Monoxide Detector			
Energy Performance Certificate			
Gas Safety Certificate			
Fit & Proper Landlord			
There is no reason to believe the landlord has committed any of the following offences;			
<ul style="list-style-type: none"> ➤ Fraud ➤ Other dishonesty ➤ Violence ➤ Illegal drugs ➤ Offences listed in sexual offences act 			
There is no reason to believe the landlord has;			
<ul style="list-style-type: none"> ➤ Practiced unlawful discrimination ➤ Contravened law relating to housing ➤ Acted otherwise than in accordance with any applicable code of practice in relation to management of houses in multiple occupation 			
Houses in Multiple Occupation (HMO) Licensing (where applicable)			
Appropriately licensed			
Tenancy Agreement is;			
for no less than 12 months			
an adequate written agreement			

Equality Impact Assessment Form

Name of strategy, project or policy to be assessed		Is the strategy/project/policy:	
Policy to Discharge Homelessness Duties through the Private Rented Sector		New X	Existing
Lead officer completing assessment	Job title	Date of assessment	
Tony Hobby	Housing Options Manager	23 rd January 2014	

1. What is the main purpose of the strategy/project/policy?

This new policy has been triggered by the Localism Act 2011. The aim of the policy is to allow the Housing Options Team to discharge it's homeless duty into the private rented sector by securing a suitable and affordable property under an assured shorthold tenancy for a minimum of 12 months.

2. List the main activities of the project/policy (for strategies list the main policy areas):

The Housing Options Team, through the West Suffolk Lettings Partnership will liaise with landlords and letting agents with regard to availability of properties and to discuss the length of tenancy required to meet the policy guidelines, the willingness to accept housing benefit and to discuss the safeguarding procedures put in place to secure and maintain the property. The property's suitability will be checked with reference to The Homelessness (suitability of accommodation) (England) order 2012).

Once a suitable landlord and property has been sourced, the 12 month tenancy will be offered to the most suitable applicant using the policy's Offer Hierarchy procedure

3. Who are the main stakeholders?

Households who the Council have accepted a duty to accommodate under Housing Act 1996 Part VII – Homelessness.

4. What outcomes are wanted from this strategy/project/policy?

This will provide an alternative to the housing register, allowing applicants outside of the homelessness duty to have a greater chance of being offered social housing due to the reduction of Statutorily Homeless in band A.

Using the private sector will also reduce the number of applicants in temporary accommodation and reduce the period of time applicants are waiting for suitable offers of accommodation.

5. Are there any concerns that the strategy/project/policy could have a differential impact in terms of equality?

Use the table below to indicate:

(a) Where you think that the strategy/project/ policy could have a negative impact on any of the equality target groups i.e. it could disadvantage them

(b) Where you think that the strategy/project/ policy could have a positive impact on any of the groups or contribute to promoting equality, equal opportunities or improving relations within equality target groups.

Please provide an explanation as to why you think there is a positive/negative or no impact.

		Positive impact – it could benefit	Negative impact – it could disadvantage	No impact	Explanation
Gender	Women			X	
	Men			X	
	Transgender			X	
Race (census categories)	White – British			X	
	White – Irish			X	
	White – other background			X	
	Mixed – White and Black Caribbean			X	
	Mixed – White and Black African			X	
	Mixed – White and Asian			X	
	Any other mixed background			X	
	Asian/Asian-British - Indian			X	
	Asian/Asian-British - Pakistani			X	
	Asian/Asian-British – any other Asian background			X	
	Black/Black British – Caribbean			X	
	Black/Black British – African			X	
	Black/Black British – any other Black background			X	
	Chinese			X	
	Gypsies/Travellers			X	
	Any other group (write in)			X	

		Positive impact – it could benefit	Negative impact – it could disadvantage	No impact	Explanation
Disability	Physical		x		A potential negative aspect to the policy is that for applicants that require adaptations and aids within the property to help with mobility, finding a property may prove difficult considering the length of tenancy offered, the financial implications of adaptations to the landlord and whether or not the landlord would allow modifications to the property. Social housing would be preferential in these circumstances.
	Sensory			X	
	Learning			X	
	Mental health issues			X	
Sexual Orientation	Lesbian, gay and bisexual			x	
Age	Older people (60 +)			X	
	Younger people (17-25), and children (0-16)			X	
Belief or Religion	Faith groups			X	
Language	English not first language			X	
Social inclusion	Low income			X	
	Rural isolation			X	

		Positive impact – it could benefit	Negative impact – it could disadvantage	No impact	Explanation
Equal opportunities and /or improved relations				x	

Notes:

Faith groups cover a wide range of groupings, the most common of which are Muslims, Buddhists, Jews, Christians, Sikhs, and Hindus. Consider faith categories individually and collectively when considering positive and negative impacts.

The categories used in the Race section are those used in the 2001 census. Consideration should be given to the needs of specific communities within the broad categories, for example, Bangladeshi people, Polish and Portuguese that do not appear as separate categories in the census.

6. Are key elements of people’s lives affected by this strategy/project/policy for example finance, accommodation, welfare?

Housing

7. Could the strategy/policy/project discriminate against any group(s) either directly or indirectly? If yes, please state how.

No. This Policy recognises that if applied to those households with Physical Disabilities they could be disadvantaged. The Policy would not be applied in such cases.

(see guidance note for definition of discrimination).

8 a) If there are any negative impacts, how could you minimise or remove any negative impact?

N/A

8 b) How could you improve the strategy, project or policy's positive impact?

N/A

9. If there is no evidence that the strategy, policy or project promotes equality, equal opportunities or improved relations – how could it be adapted so that it does?

N/A

10. What consultation has been carried out on the strategy/policy/project? Please include details of any equality monitoring carried out.

None

11. Do you have data available which monitors the impact of the policy on minority groups? If not, please explain how you intend to continue monitoring the impact of this strategy, policy or project

Details of applicants ethnicity, sex, sexual orientation, disabilities, religious beliefs are all recorded on the Councils Housing Register and Homelessness databases.

The ethnicity, sex, sexual orientation, disabilities, religious beliefs of homeless households broadly reflects that of the general population in the area.

12. Has this EqIA been consulted on? Who with? What feedback was received?

Internal: n/a
External: n/a

13. Next steps: Based on your assessment, what changes, if any do you need to make? Tick one of the following and provide an explanation of why this is the action you are taking.

Action*	Tick ✓ relevant	Explanation of action
No major change		
Adjust the policy		
Continue the policy	X	The Policy is robust with no major potential for discrimination.

Stop and remove the policy		
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14. Summary of findings

Please write a short summary of your findings including any recommendations for change or further actions. This summary could be included in any reports to committee. See other completed EqIAs for examples (available on the intranet).

This policy is an additional means by which to discharge homeless duty and will not override the Housing Register (Home-Link). For rare cases of homeless applicants with restricted mobility discharging into a privately rented property would not be feasible and an offer of long term secure accommodation through the housing register would be a far more cost effective and a more suitable means of discharging homeless duty.

Please sign and date this form, keep one copy and send one copy to the relevant Corporate Director and one to the Strategy and Performance Unit.

Name:Signed:

Date:

If you have identified any negative impact which is possibly discriminatory and not intended and / or of high impact, you must amend your policy/strategy and/or contact the Policy Unit to discuss remedial action