	<p align="center"><b>Community and Wellbeing Scrutiny Committee</b> 20 November 2024</p>
	<p align="center"><b>Report from the Corporate Director of Partnerships, Housing and Residents Services</b></p>
	<p align="center"><b>Cabinet Member for Housing</b></p>
<p><b>Temporary Accommodation</b></p>	

<b>Wards Affected:</b>	ALL
<b>Key or Non-Key Decision:</b>	Non-Key
<b>Open or Part/Fully Exempt:</b> <small>(If exempt, please highlight relevant paragraph of Part 1, Schedule 12A of 1972 Local Government Act)</small>	Open
<b>List of Appendices:</b>	None
<b>Background Papers:</b>	None
<b>Contact Officer(s):</b> <small>(Name, Title, Contact Details)</small>	Laurence Coaker Director of Housing Needs and Support <a href="mailto:Laurence.coaker@brent.gov.uk">Laurence.coaker@brent.gov.uk</a>

## 1.0 Executive Summary

- 1.1. To inform members of the Community and Wellbeing Scrutiny committee on the provision and management of Brent Council's Temporary Accommodation and Homeless Prevention Service since the last report to the committee in November 2023. The report provides an update on the support for families in the borough who are homeless, or at risk of becoming homeless, including the performance of services, demand for services delivery of support and improved outcomes for service users.

## 2.0 Recommendation(s)

- 2.1 That the committee note the content of the report.

## 3.0 Detail

### Contribution to Borough Plan Priorities & Strategic Context

- 3.1 The Borough Plan includes the following strategic priorities specific to Housing Needs

- Strategic Priority – Thriving Communities
- Strategic Priority – The Best Start in Life
- Strategic Priority – A Healthier Brent

3.2 These priorities re-affirm the Council's ambition to reduce the impact to health for homeless people. As well as increased access to employment opportunities for homeless households, achieve better outcomes for homeless households.

3.3 The report provides information on the relocation of the Families Homelessness Service to the New Millennium Centre, which will be host to a wider Community Wellbeing Programme of support. The proposed relocation aligns with the Council's commitment to create long lasting positive change to local areas, for the benefit of local communities and aligns with the Borough Plan 2023 - 2027 priorities of 'Thriving Communities', 'A Healthier Brent' and 'Prosperity and Stability in Brent'. Proposals are also in line with Brent's Homelessness and Rough Sleeping Strategy 2020-2025.

3.4 The proposals closely align with Brent's new Strategic Change Programme, including enabling outcome-focused approaches that support residents through a model of preventative and integrated Brent Council, VCS and partner services that respond to local need.

#### **4 Background**

4.1 The Housing Needs Service has seen a 33% increase in demand from homelessness households from 2021/22 to 2023/24, when 7,300 applications were received (average of 140 applications per week). The demand in the first two quarters of 2024/25 was 3,378 applications, which if remains the same would result in a total of 6,756 applications for the year, (average of 130 applications per week), a 7% reduction on the previous year. The reduction has been in approaches from single people, rather than families, which are forecast to increase by 3%.

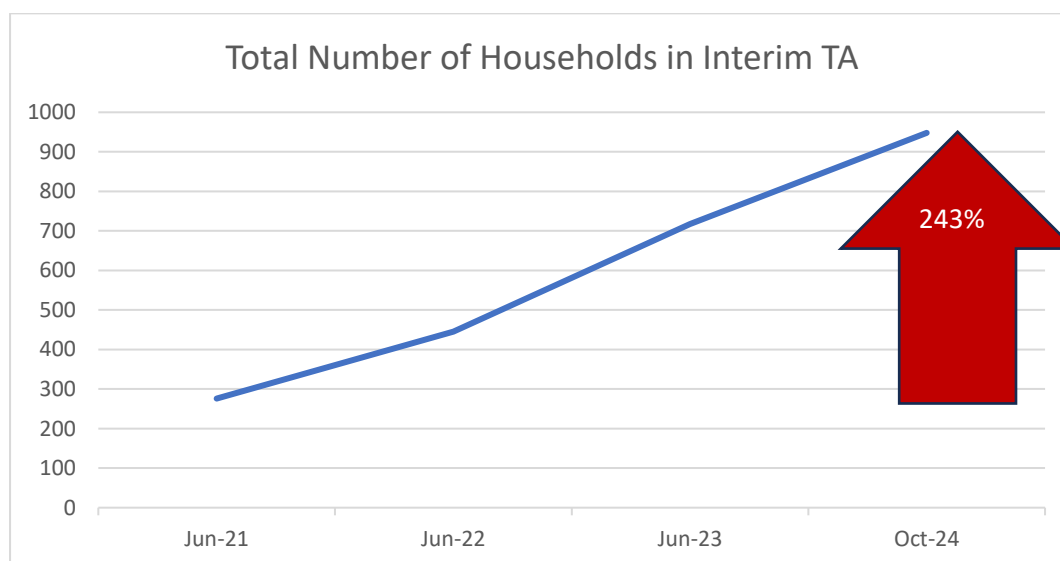
4.2 This high demand is being driven by affordability issues, rising rents and the contraction of accommodation available in the Private Rented Sector (PRS), as owners of PRS accommodation are evicting their tenants and exiting the market. Figures released by the Office for National Statistics (ONS) for the period to June 2024 show that since June 2023 there has been a 33.9% increase in the cost of private rents in Brent.

4.3 The use of PRS properties is essential to help meet demand from homeless households, as there is an insufficient supply of social housing. The contraction of supply has resulted in the service not being able to secure a sufficient supply of affordable PRS accommodation at the Local Housing Allowance (LHA) rate to meet demand.

4.4 When a household approaches the Council as either homeless or threatened with homelessness, the Housing Options Team (for families) or the Single Homelessness Team (for single households or couples without children)

conducts a formal assessment against a number of criteria as prescribed in the Housing Act 1996 Part 7 and the Homelessness Reduction Act 2017.

- 4.5 If a household is eligible, homeless and meets the priority need threshold under homelessness legislation, the Council has a statutory duty to secure interim accommodation during the relief duty/assessment stage of their application. The household will remain in this interim accommodation while the officers work to relieve their homelessness and continue to assess their homeless application.
- 4.6 Whilst the Housing Needs service has access to some Council owned accommodation to use during this relief/assessment stage of the application, namely Knowles House and Anansi House, in Harlesden, this supply is insufficient to meet the demand, and so the Council is forced to use privately owned, nightly paid interim accommodation, often referred to as bed and breakfast accommodation, to meet statutory duties.
- 4.7 Due to the lack of supply of affordable PRS accommodation to move homeless households on to, the B&B accommodation has become silted up with 948 homeless households (including single homeless people) being accommodated in interim B&B accommodation, as of 28 October. This is a 243% increase on the number of households in B&B in June 2021, when there were 276 households in B&B.



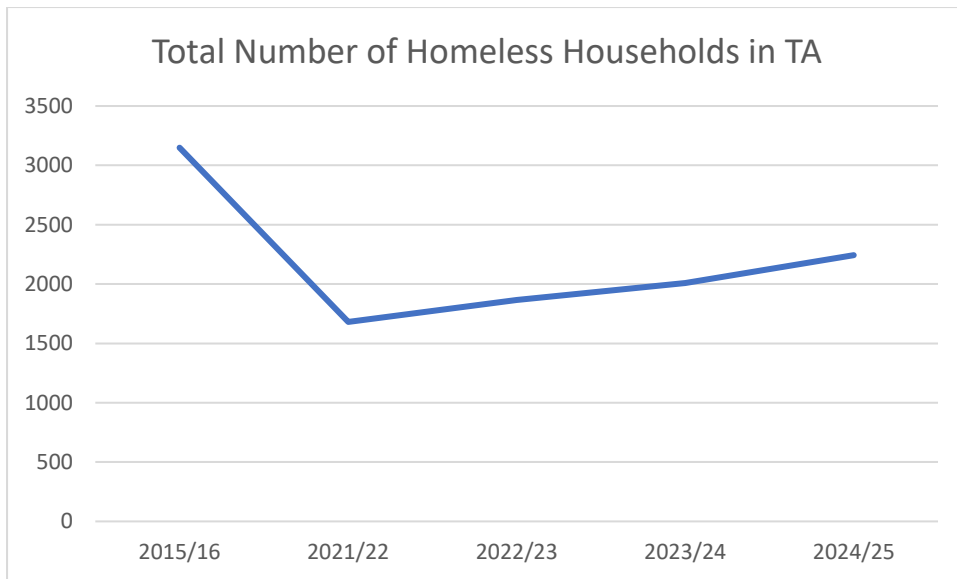
- 4.8 As these issues are affecting all London Boroughs, the competition for these privately owned B&B's is high, resulting in B&B across London also becoming silted up. The Council has therefore had to secure alternative interim accommodation at inflated rates, as well as accommodation outside of Brent, to meet statutory duties to accommodate homeless households. This out of borough accommodation is predominately in other London boroughs and in High Wycombe and Wendover in Buckinghamshire.

- 4.9 If it is not possible to relieve homelessness, and the household has met the legislative criteria, the main housing duty to secure suitable accommodation for the household is triggered. The Council will always try and secure suitable accommodation in the PRS to end the main duty. However, as there is a lack of affordable accommodation available in the PRS a family may be placed in settled leased Temporary Accommodation (TA) which does not end the main homelessness duty. Table 1 below sets out the different TA schemes used to accommodate homeless households.

*Table 1 Temporary Accommodation Schemes*

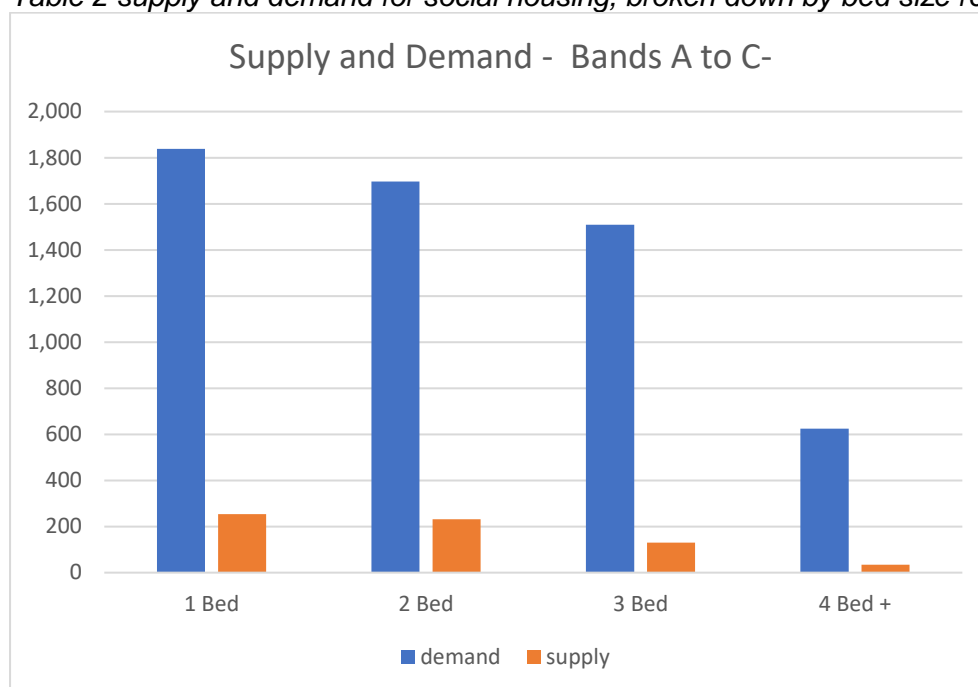
<b>Scheme Name</b>	<b>Interim TA</b>
B&B	Nightly paid non –self-contained accommodation (sharing a kitchen, bathroom or toilet)
Annexe	Nightly paid self-contained accommodation (exclusive use of a kitchen, bathroom and toilet)
Knowles House and Anansi House	Council owned self-contained accommodation
<b>Scheme Name</b>	<b>Settled Temporary Accommodation</b>
Housing Association and other Leasing Schemes	Private owned self-contained accommodation leased to Housing Association or management agents and offered to the Council
Brent Direct Leasing (BDL)	Private owned self-contained accommodation leased directly to the Council
Brent Direct Leasing South Kilburn (BDLSK)	Council owned self-contained accommodation used as TA pending redevelopment

- 4.10 Prior to the pandemic and the shift in the PRS market set out above, the Council was making good progress in reducing the use of TA for homeless households and achieved a 47% reduction from 2015/16 when there were 3149 households in TA to 1,681 households in 2021/22. This was the 2<sup>nd</sup> highest reduction achieved across London. However there has since been a 33% increase in the use of TA to the current total of 2242.



- 4.11 Although there are fewer households in TA now compared to 2015/16, the financial burden is far greater because 42% of the current TA is interim (nightly paid B&B) accommodation, as opposed to leased settled TA.
- 4.12 The overall cost of providing TA is the difference between the costs to the council of procuring the TA and the income received from housing benefit subsidy less any rent collected from tenants earned income (if they are working)
- 4.13 For B&B accommodation, the maximum weekly income is capped at 90% of the one bedroom LHA rate for January 2011 for the broad rental market area (BRMA) in which the B&B is situated. Brent has three BRMA's, but the average income received per night is £32. The average cost per night of B&B placements is set out below
- o 1 Bed = £50
  - o 2 Bed = £60
  - o 3 Bed = £100
  - o 4 Bed = £136
  - o 5 Bed = £150
- 4.14 On average, only 650 social housing (both Council and Housing Association) properties become available to let each year, 40% of which are one bed or studio properties. There are currently 34,000 households on the Housing Register (waiting list) in priority bands A to D. Due to the lack of supply of social housing that is available in Brent, only households in priority bands A to C(-) are eligible to bid. This is because properties are allocated in band and then date order. So, households in band D have no realistic prospect of securing social housing, as there will always be a household in a higher band. Table 2 below gives a breakdown of supply and demand for social housing, broken down by bed size required.

Table 2 supply and demand for social housing, broken down by bed size required



4.15 Due to this gulf between the supply and demand of social housing, homeless households must wait for many years in TA before an offer of housing is available. The average waiting time to secure social housing depends on the household’s priority band and the size of accommodation required. Table 3 below illustrates the average waiting time for households in TA, who are in priority band C, which is the band that most of the main duty accepted homeless households are in

Table 3, average waiting time for social housing for households in priority band C

Bed Size	Average Waiting Time - Band C
1 Bed	2 Years
2 Bed	9 Years
3 Bed	16 Years
4 Bed	24 Years

**Performance**

4.16 The Homelessness Reduction Act 2017 introduced two new statutory duties for households who are eligible and threatened with homelessness or homeless. Councils must take reasonable steps to prevent homelessness for any eligible household who is at risk of homelessness within 56 days, regardless of whether they meet the priority need threshold (the prevention duty). This can involve assisting them to stay in their current accommodation or helping them to find a new place to live. If the household is already homeless, the authority has a duty to help them secure accommodation for at least six months (the relief duty).

- 4.17 The main housing duty is owed if a household remains homeless after the relief duty comes to an end, are in priority need, and have not intentionally homeless. If a household is owed the main housing duty, the Council have a duty to secure suitable alternative accommodation, which can be in the PRS to end the duty.
- 4.18 The Housing Needs target is to prevent or relieve 50% of all homelessness applications received and accept the main homelessness duty for 25% of applications. The remaining 25% are expected not to meet the statutory threshold to trigger the prevention or relief duties.
- 4.19 The year to date performance on prevention or relief of homeless cases is set out in table 4 below.

*Table 4 Year to date performance of the homelessness service*

	<b>Apr-24</b>	<b>May-24</b>	<b>Jun-24</b>	<b>Jul-24</b>	<b>Aug-24</b>	<b>Sep-24</b>	<b>Year to date</b>
<b>Total number of homeless approaches</b>	564	567	468	513	564	702	<b>3,378</b>
<b>Percentage of homelessness prevented and relieved successfully</b>	57%	54%	50%	52%	52%	53%	<b>53%</b>
<b>Percentage to whom the main duty accepted</b>	33%	40%	29%	37%	41%	28%	<b>35%</b>

### **Support**

- 4.20 The Single Homeless Service relocated to the Turning Point at The Design Works, Park Parade, Harlesden, NW10 4HT in August 2023. The primary reason for this relocation was to move to a face-to-face drop-in service, which is easily accessible, and avoid people having to apply via the online appointment system.
- 4.21 The online appointment system was not able to cope with the volume of demand, leading to a backlog of appointments and delays in assessing applications. Since moving to the Turning Point the backlog of appointments have been cleared and average caseloads for officers reduced. Applicants receive an initial triage interview on the same day they approach, which determines what their housing issues are, identify any support needs, and are referred to the appropriate housing and support pathway to meet their needs.
- 4.22 Following the success of the relocation of the Single Homeless Service, the Families Homelessness Service will also be relocating from the Civic Centre, Wembley to the New Horizons Centre (formally known as the New Millennium Centre), 1 Robson Avenue, NW10 3SG, Roundwood. The site is located in the south of the borough, where the majority of homelessness demand comes

from, and is walking distance from the Single Homeless Service at the Turning Point, (10 minutes). It is also conveniently located a walking distance to the Crisis Skylight building (15 minutes) and Job Centre Plus Harlesden (15 minutes), both key partners in tackling the homelessness emergency

- 4.23 Locating the Family Homeless Service at New Horizons will benefit from co-location with other services designed to support vulnerable adults and families. This includes the expanded Community Wellbeing Service, which is targeted at families and provides wraparound and food support on a membership basis, with an expected evening free Community Kitchen meal service available to all (including non-members). Brent Hubs provision will also be available on site. The Brent Hubs already work directly with and alongside volunteer and charity organisations, such as Citizens Advice, Age UK, Brent Mind, and many others, enabling much clearer referral pathways and knowledge sharing.
- 4.24 The primary goal is to empower residents to become more independent, yet during times of unprecedented crisis support will be available to help with immediate responses to risk of homelessness. Co-location with wider services including Brent Hubs, debt and food support is expected help vulnerable families with wider challenges they may be facing.

#### **Find a place you can afford**

- 4.25 Homeless households are being supported to secure their own property in the PRS to end their homelessness. A communication strategy has been launched (see the links in section 11 below) to promote the *find a place you can afford scheme*. The scheme empowers households to find their own accommodation in the PRS, which the Council will help them to secure by paying a financial incentive to the landlord.
- 4.26 Given the scarcity of affordable PRS accommodation available in Brent and London generally, households are being encouraged to be as flexible as possible about the location of accommodation.
- 4.27 The scheme is also being promoted at workshops for homeless families who have recently approached the council for support. These workshops commenced in October and the feedback has been positive, with a number of families who have taken up the advice and secured their own accommodation with the assistance of the council.

### **5.0 Stakeholder and ward member consultation and engagement**

- 5.1 The Lead Member for Housing, Homelessness, and Renters' Security has fortnightly briefing meetings on the homelessness and TA challenges the Council is facing and has endorsed the *Find a place you can afford* communications campaign to raise awareness.

### **6.0 Financial Considerations**



- 6.1 The 2024/25 Housing Needs budget estimates a £15.2m budgetary pressure for the year. This is made up of a £10.4m forecasted subsidy loss, with the remaining £4.8m relating to an increase in provider costs. The £15.2m forecast excludes any increases required to the provision set aside recognising a risk of non-collection of rental income. A 5% worsening in the collection rate costs approximately £0.9m.
- 6.2 The type of accommodation provided as TA has a bearing on entitlement to housing benefit subsidy for the payments made. Where a family occupies more than one room in a hotel and those rooms are not connected only one room will be eligible for subsidy. Depending on whether the accommodation is self-contained (exclusive use of a kitchen, bathroom and toilet) or non-self-contained (one or more facilities is shared), there is a cap on the subsidy entitlement based on the applicable Local Housing Allowance (LHA). Payments above the 90% 2011 LHA cap are ineligible for HB subsidy.
- 6.3 The Housing Needs service has a net budget of £2.2m, which comprises of a £28.3m expenditure budget and a £30.6m income budget. The main Homelessness Prevention grant increased by just 4% from 2023/24.
- 6.4 The Housing Needs budget includes an internal Single Homelessness Team, with a current expenditure budget of £2m. This team deals with all single homeless people who have higher vulnerabilities and support needs. A contract has also been let under the Council's contract terms and conditions for a four year period (1 November 2023 to 31 October 2027) to the existing provider (Pan London Single Homelessness Prevention Service Limited) to deliver the Single Homeless Prevention Service (SHPS) in Brent, to single homeless people with low vulnerabilities and support needs.
- 6.5 There are several mitigations in place or due to be commenced to increase in supply of Temporary Accommodation, although the overarching budgetary pressure from homelessness may not be significantly alleviated by these potential savings, as they are not immediately cashable against the backdrop of ongoing overspend and there is ongoing demand for the service

## **7.0 Legal Considerations**

- 7.1 The Homelessness Reduction Act 2017 (HRA 2017) places a duty on Local Authorities to intervene at an early stage to help prevent homelessness and take reasonable steps to relieve homelessness for all eligible applicants, not just those in priority need.
- 7.2 When a homelessness application is taken under the relief duty, under s.189B of the Housing Act 1996, as amended (the 1996 Act), introduced by HRA 2017, if a local authority have reason to believe that an applicant may be homeless, eligible for assistance and have a priority need, pursuant to s.188 of the 1996 Act, they have a mandatory duty to secure that accommodation is available for the applicant's occupation, irrespective of intentional homelessness. The Council do this through the provision of emergency temporary accommodation. After 56 days, upon the completion of the local authority enquiries, if it is

established that the applicant is homeless, in priority need and not homeless intentionally, the local authority has an immediate and non-delegable duty to secure that applicant and their household suitable accommodation: s193(2). The Council can fulfil this duty on an interim basis through the continued provision of temporary accommodation pending a final offer of private rented sector accommodation or social housing. The suitability of accommodation is governed by s.210 of the 1996 Act, the Homelessness (Suitability of Accommodation) Order 1996 (SI 1996/3204) and by the Homelessness Code of Guidance for Local Authorities.

- 7.3 When discharging their housing duties under Part VII, an authority must, so far as reasonably practicable, secure that accommodation, be it temporary or permanent, is available for the applicant's occupation in their own district: s208(1) of the 1996 Act. If the Council is unable to comply with its mandatory accommodation duties either through the provision or suitability of such accommodation, then it is significant risk of successful judicial review challenges which are likely to have significant cost consequences to the Council.
- 7.4 The Supreme Court in *Nzolameso v Westminster City Council* 2015 addressed accommodation procurement and placements strategy. It sets out a range of issues that councils need to consider when allocating temporary accommodation to homeless households and makes certain requirements of the councils. These include:
- A requirement that local authorities need to explain their decisions as to the location of the properties offered.
  - Each local authority should have, and keep up to date, a policy for allocating temporary accommodation to homeless households.
  - The policy should reflect the authority's statutory obligations under both the Housing Act 1996 (as amended) and the Children's Act 2004.
  - Where there is an anticipated shortfall of accommodation in the borough, the policy should explain the factors to be considered when making decisions on where a household is placed.
  - The Supreme Court also proposed that each local authority should have a policy for procuring sufficient units of temporary accommodation to meet anticipated demand for the coming year.

## **8.0 Equity, Diversity & Inclusion (EDI) Considerations**

- 8.1 The public sector equality duty, as set out in section 149 of the Equality Act 2010, requires the Council, when exercising its functions, to have "due regard" to the need to eliminate discrimination, harassment and victimisation and other conduct prohibited under the Act, to advance equality of opportunity and foster good relations between those who have a "protected characteristic" and those who do not share that protected characteristic. The protected characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

8.2 Having due regard involves the need to enquire into whether and how a proposed decision disproportionately affects people with a protected characteristic and the need to consider taking steps to meet the needs of persons who share a protected characteristic that are different from the needs of persons who do not share it. This includes removing or minimising disadvantages suffered by persons who share a protected characteristic that are connected to that characteristic.

8.3 There are no obvious negative EDI considerations emerging from this report. The report highlights the current challenges around increases in service demand related to the cost of living crisis and contraction of properties available in the PRS. The Council have plans in place to mitigate the implications as far as possible and these plans are focused around supporting vulnerable and marginalised groups. The Council's commitment to supporting these groups and avoiding challenges around integration, cohesion and homelessness demonstrates our commitment to help these groups.

## **9.0 Climate Change and Environmental Considerations**

9.1 There are no immediate climate or environmental considerations arising from this report.

## **10.0 Human Resources/Property Considerations (if appropriate)**

10.1 There are no relevant considerations arising from this report.

## **11.0 Communication Considerations**

11.1 Brent launched its *Find a place you can afford* campaign with a video (see link to webpage), [booklet](#) and [webpage](#) with more housing advice.

**Report sign off:**

***Peter Gadsdon***  
***Corporate Director, Partnerships, Housing***  
***and Resident Services***