



Housing Services Cabinet Committee

Members of the **Housing Services Cabinet Committee** of **Gravesham Borough Council** are summoned to attend a meeting to be held at the Council Chamber, Civic Suite on **Thursday, 3 February 2022 at 7.30 pm** when the business specified in the following agenda is proposed to be transacted.

S Walsh
Service Manager (Communities)

Agenda

Part A

Items likely to be considered in Public

1. Apologies
2. Minutes (Pages 3 - 8)
3. Declarations of Interest
4. To consider whether any items in Part A of the Agenda should be considered in private or any items in Part B in public
5. Working safely in Council Housing (Pages 9 - 24)
6. Draft Temporary Accommodation Policy (Pages 25 - 44)
7. Any other business which by reason of special circumstances the Chair is of the opinion should be considered as a matter of urgency.

8. Exclusion

To move, if required, that pursuant to Section 100A (4) of the Local Government Act 1972 that the public be excluded from any items included in Part B of the agenda because it is likely in view of the nature of the business to be transacted that if members of the public are present during those items, there would be disclosure to them of exempt information as defined in Part 1 of Schedule 12A of the Act

Part B

Items likely to be considered in private

None

Members

CLlr Jenny Wallace (Chair)

CLlr Christina Rolles (Vice-Chair)

Councillors: Ejaz Aslam
 Dakota Dibben
 Baljit Hayre
 Leslie Hills
 Leslie Hoskins
 Lyn Milner
 Leslie Pearton
 Peter Scollard

Substitutes: To be notified

Housing Services Cabinet Committee**Monday, 15 November 2021****7.30 pm****Present:**

Cllr Jenny Wallace (Chair)
Cllr Christina Rolles (Vice-Chair)

Councillors: Dakota Dibben
Leslie Hills
Leslie Hoskins
Jordan Meade
Lyn Milner
Leslie Pearton
Peter Scollard
Gurbax Singh

Jody Bulman Service Manager (Housing Landlord Services)
Nicole Arthur Service Manager (Housing Operations)
Victoria May Service Manager (Housing Options)
Julie Francis-Beard Committee Services Officer (minutes)

18. Apologies for Absence

An apology for absence was received from Cllr Ejaz Aslam and Cllr Jordan Meade attended as his substitute. An apology for absence was received from Cllr Baljit Hayre and Cllr Gurbax Singh attended as his substitute.

19. Minutes

The minutes of the meeting of the Committee held on Monday, 6 September 2021 were agreed and signed by the Chair.

20. Declarations of Interest

No declarations of interest were made.

21. Corporate Performance Update: Quarter 2 2021-22

The Service Manager (Housing Landlord Services) presented Members with an update against the Performance Management Framework, as introduced within the council's Corporate Plan, for Quarter Two 2021-22 (July to September 2021) and highlighted the following:-

- The average time to re-let Council housing has increased due to the impact of Brexit and Covid. Due to a national shortage of materials, this has then had a knock on effect on void times. The Council is seeking to overcome this by increasing the number of contractors we work with to enable us to have more access to materials.

- Number of households in temporary accommodation has increased due to the number of incidents of domestic abuse and because landlords are now able to evict tenants again which they had not been previously able to do due to the legislative changes put in place throughout covid.

The Service Manager (Housing Options) and team have been helping with this by placing a greater focus on prevention and intervention.

The Chair thanked the Service Manager (Housing Landlord Services) and the team for their hard work.

Resolved that the Committee noted the report.

22. Climate Change in Housing and Digital Innovation

The Service Manager (Housing Operations) updated the Committee of the action plan in regards to Climate Change in Housing Operations and updated on some digital innovation projects that are being progressed.

The Compliance and Project Manager presented the Committee with the portfolio system at the previous Housing Committee on 6 September, which clearly outlined the significant work and funding which would be required to achieve the net zero target by 2030.

Over the last two months, the Service Manager (Housing Operations) have been developing an action plan for all the services within their area of responsibility to capture a number short, medium and long term measures to assist with improving the energy efficiency of council-owned homes as well as reducing carbon emissions within the Borough.

Staff within the Housing Operations Team have had the opportunity to contribute thoughts and ideas around possible actions as well as research into the current thinking and best practice within the industry. The action plan can be found at appendix 2 and will be a working document that will develop as time goes on, capturing new ways of working.

Some of the actions identified in the short term are already in progress:-

- The Resident Engagement Strategy in relation to energy improvement works had been drafted.
- Applied for Social Housing Decarbonisation Fund Wave 1 and in January 2022 the Council will find out if they have been successful.
- Received funding for LAD 2, Social Housing funding and are working with a consultant to create an asset management strategy consisting of a grading module system.

As part of the action plan, digital innovation projects have been trialled and developed across the service:-

- **Localz** – expansion of current repairs appointment system. In the next few months, tenants will be able to receive live alerts from engineers undertaking jobs, they can track when the engineer is on their way, how far away they are and be able to send messages back to the engineers where there will be two-way communication. This will benefit the locals, it will enhance the customer experience for those that wish to

use the digital platform, it will also help to reduce the no access rate, ensure that customers are in when their appointment is due, reduce wasted appointments and reduced travel time.

- **Door data system** – new fire doors will be installed with a unique door data tag which will feed into a National Fire Door compliance software. The data tag will be scanned each time it is inspected and will automatically update the system. The system will also store components used to anyone doorset making recall for future maintenance quick and efficient and ensure the correct materials are used and sourced for remedial works.
- **EmRed** – trialling two sheltered schemes and two residential blocks, EmRed will be fitted to the emergency lighting. This will mean that the emergency lights can be tested remotely and any results, faults or preventative maintenance will be sent direct to the Council.
- **MultiDOT** – installed into 10 properties. It is a time monitoring system for humidity conditions to determine whether the property is at risk of damp or mould. This will help to inform preventative maintenance and customer education. The MultiDOT will also detect if someone is not using their heating or the heating may not be working which will allow the Council to be proactive by contacting the tenant to identify any issues and will also assist with identifying fuel poverty.
- **Digital Noticeboard** – which we have in a sheltered scheme and in one of the new builds, it makes communicating with tenants faster, easier and more inclusive. It can display important information such as maintenance schedules or repair notices, as well as general announcements. The digital noticeboard is an efficient way to keep tenants informed it reduces site visits, reduces paper notice waste. It also has a unique survey feature which allows for a question to be posed to tenants who can then vote by placing their key fob on to the reader. A video of the digital noticeboard was shown to the Committee.

Following questions and comments from Members, the Service Manager (Housing Operations) explained that:

- Following a question, regarding the costs of becoming carbon zero by 2027/287 were, the Service Manager (Housing Operations) explained that there were no exact costs to date but at the last Committee during a presentation it was discussed that approximately £16m would be required to get the rating the Council required. It would be difficult to forecast as these climate change in housing costs were increasing significantly.
- Regarding fire evacuations, could the digital noticeboard give instructions on how to evacuate the building? The Chair explained that new tenants are given the evacuation procedures and full instructions when they move in and in this particular building, the procedures are located on the back of their front door.
- Using the functionality of the digital noticeboard is an easy way of keeping tenants informed without the officers having to go round to the property. Feedback, and if necessary, officer visits to follow up on the survey responses that the tenants have previously given.
- Number 5 of the Action List (appendix 2) – create a resident engagement strategy in relation to energy improvement works is this going out to consultation and will this reported back to the Committee. The Service Manager (Housing Operations) explained that the Council could engage at an early stage and complete the works tailored to the property.

- An update on the resident engagement strategy specific to energy will come back to this Committee and Members and Officers are encouraged to get involved.

The Chair thanked the Service Manager (Housing Operations) and the team for their hard work that had gone into making this report.

Resolved that the Committee noted the contents of the report and action plan.

23. Landlords Forum

The Service Manager (Housing Options) provided Members with a presentation on the Landlords Forum.

The presentation has been published and can be found on the link below:

<https://democracy.gravesham.gov.uk/documents/b14055/Hsg%20Committee%20presentation%20on%20Landlords%20Monday%2015-Nov-2021%2019.30%20Housing%20Services%20Cabinet%20Committ.pdf?T=9>

In response to Member questions, the Service Manager (Housing Options) explained that:

- The Chair explained that this was the first step towards an overdue activity in making firm contacts with private landlords. This provides the tenants with much needed support and not just financial.
- This is a good way of sorting out rogue landlords as well as those that look after their tenants.
- Following a question from a Member about Member involvement. The Service Manager (Housing Options) explained that Member involvement would be welcomed and to know exactly what Members like to see coming out of future presentations. A briefing note about COMF Funding will be sent out to Members in due course to enable them to understand where the money will be spent and to share the link to others.
- The Chair mentioned that if any Members know of any private landlords that are not engaging in the way the Council would prefer to let the Housing Options Team know. If there are any tenants that require further assistance, to let them know.
- The Service Manager (Housing Options) explained in response to a question about how this scheme will impact or strengthen our tenants and it is felt they are not currently given a strong enough platform. Tenants that need support will work with the other roles within the service such as the Prevention Officers and Homeless Officers and there is a framework the service follows to support customers and make enquiries around their circumstances.
- In response to a question about how many private landlords are supporting this scheme, the Services Manager (Housing Options) explained that the team will have to engage and listen to landlords and where we offer a tenant find service we would have to ensure we tailor the right tenants to each property.
- The option of identifying funding was discussed and creating a new incentive package for landlords which included financial / support could be investigated.
- The Service Manager (Housing Options) will look to investigate the cost of a case at Gravesham Borough Council to evidence the long term savings of homeless prevention and when this is done would be happy to report back to this Committee.

The Chair thanked the Service Manager (Housing Options) for an excellent presentation.

Close of meeting

The meeting ended at 8:20pm

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Classification: Public

Key Decision: No

Gravesham Borough Council

Report to: Housing Committee

Date: 3 February 2022

Reporting officer: Nicole Arthur, Service Delivery Manager (Housing Repairs)

Subject: Working Safely in Council Housing

Purpose and summary of report:

To outline, and to give assurances to Housing Services Cabinet Committee on how DSO Building Management meets compliance with the general requirements of the Health and Safety at Work Act 1974 and the more specific requirements of the Construction (Design & Management) Regulations 2015.

Recommendations:

1. For information only.

1. Introduction

- 1.1 Gravesham Borough Council recognises its duty of care and is committed to creating a safe and healthy environment for all construction and maintenance activities within its housing stock. This will include thorough planning, co-ordination and project management from conception to completion
- 1.2 Gravesham Borough Council has a statutory duty to ensure that works undertaken to its housing stock is performed in a safe manner to prevent damage to property, or injury to any person (resident, employee or visitor) which is subject to the following specific regulations, Approved Codes of Practice and industry guidelines:
 - Health and Safety at Work Act 1974
 - Management of Health and Safety at Work Regulations 1999
 - Construction (Design and Management) Regulations 2015
 - L153 – Managing Health and Safety in Construction
 - The Work at Height (Amendment) Regulations 2007
 - Control of Asbestos Regulations 2012
 - Electricity at Work Regulations 1989
 - Provision and Use of Work Equipment Regulations 1998
 - Manual Handling Operations Regulations 1992
 - Personal Protective Equipment at Work Regulations 1992
 - Control of Substances Hazardous to Health Regulations 2002

- Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
- Lifting Operations and Lifting Equipment Regulations 1998
- The Control of Noise at Work Regulations 2005
- The Confined Spaces Regulations 1997
- The Corporate Manslaughter and Corporate Homicide Act 2007
- The Regulatory Reform (Fire Safety) Order 2005- Section 17 (Maintenance)

2. Construction Design and Management Regulations (CDM) 2015

- 2.1 The Construction Design and Management Regulations (CDM) 2015 have been established to improve health and safety across the construction industry and require work to be planned and managed so the risks involved are eliminated or reduced so far as reasonably practicable.
- 2.2 The requirements of CDM apply to all “construction work” as defined within the Regulations. This definition includes a very wide scope of activities. Examples range from minor repairs and maintenance activities to major construction and renovation projects.
- 2.3 In 2016, DSO Building Management recruited a CDM Officer into the Compliancy Team to carry out the functions of the Designer or Principal Designer for DSO Building Management. The CDM Officer will liaise with all duty holders and stakeholders to ensure DSO Building Management construction and maintenance activities fulfil the requirements of the CDM Regulations.
- 2.4 In 2019 Management Team approved the Construction & Maintenance Safety Policy and Management Plan which describes how DSO Building Management effectively manages the requirements of the CDM Regulations to protect the health of our tenants, employees, contractors and members of the public from the potential risks associated with construction and maintenance activities. This document is reviewed and updated on an annual basis.

3. Contractor monitoring

- 3.1 The CDM Officer carries out scheduled and unannounced site inspections on the Council’s contractors and provides comprehensive reports on a monthly basis to the relevant Project Manager and the Principal Contractor. The inspection report focuses on elements of the project that are specific to CDM Regulations, where applicable these include:
 - 3.1.1 Site security, signage, registration and housekeeping
 - 3.1.2 A Construction Phase Health and Safety Plan
 - 3.1.3 The Health and Safety File
 - 3.1.4 Statutory notices including HSE law poster and F10
 - 3.1.5 Emergency arrangements (inc. fire safety plan & first aid provisions)
 - 3.1.6 Record of inductions, inspections, audits, incidents and accidents
 - 3.1.7 Evidence of training and competence
 - 3.1.8 RAMS and permits to work
 - 3.1.9 Hazardous substances including asbestos
 - 3.1.10 Traffic management
 - 3.1.11 Welfare facilities
 - 3.1.12 Maintenance records
 - 3.1.13 Personal Protection Equipment

- 3.1.14 Scaffolding & electrical safety
- 3.1.15 Waste management

3.2 The inspection report will recommend remedial actions, further control measures and deadlines to track progress and will be reviewed at contract meetings. An example of an inspection report can be found in Appendix 2.

4. DSO Building Management in-house workforce

4.1 The voids, responsive repairs and in-house work programmes are also subject to periodic site inspections by the CDM Officer with a subsequent follow up report. Unlike major projects not all of the elements of the CDM Regulations apply, however to ensure best practice, the managers and supervisors within the service adopt a similar approach when establishing safe systems of work.

4.2 In order to comply with the policy and regulations for the operational workforce, the managers and supervisors within DSO Building Management ensure:

4.2.1 The relevant safety information is communicated effectively to all. This is done through a variety of channels such as training, toolbox talks, team meetings and one to ones.

4.2.2 Risk assessments are in place and are an important element when ensuring the health and safety of employees and the public. Risk assessments are reviewed annually or when changes have been made or new hazards arise. Part of the process is to ensure that the workforce is consulted with and engaged in regards to risk and how they will be managed. Staff are also encouraged to report any accidents or incidents to enable changes in work practices or amendments to risk assessments. An example Risk Assessment can be found in Appendix 3.

4.2.3 Work is planned sensibly for each day so that risks involved are managed from concept to completion.

4.2.4 A skills matrix is carried out with all staff yearly to ensure the right people are used for the right task at the right time. Skill sets are embedded within the Oneserve system which ensures that only the relevant skillset and qualification is used.

4.2.5 The right information is available for the workforce to ensure risks can be managed effectively, such as access to an up-to-date asbestos report.

4.2.6 Health and safety issues are on the agenda of all routine management meetings and one to ones.

4.2.7 An on-the-job risk assessment and relevant safety information is embedded within each individual appointment on Oneserve for the employee to complete and is monitored via the office.

4.3 Over the last three years, five accidents/ injuries have occurred amongst the operational workforce which have involved small injuries such as bruising as banging of hands which is low for this sector and also taking into account that over 65,000 repair jobs were undertaken during this period as well as refurbishment on 813 empty properties.

5. Conclusion

- 5.1 As outlined within the report, there are sufficient health and safety arrangements in place across DSO Building Management that will continually be reviewed and improved upon and this should give Housing Committee confidence in the working practices and processes of the service.

6. Background papers

- 6.1 None

IMPLICATIONS	APPENDIX 1
Legal	As a landlord, Gravesham Borough Council (GBC) has a legal responsibility to ensure the health and safety of their employees, contractors, tenants and others, by keeping the property safe and free from health hazards
Finance and Value for Money	Not having sufficient health and safety measures in place and safe systems of work has the potential to be extremely costly for the Council in regards to Public Liability and Employee Liability Claims.
Risk Assessment	Any breach of health and safety regulations is a criminal offence and as such, any company or individual manager found to be in breach of these health and safety regulations could face prosecution by the Health and Safety Executive (HSE).
Data Protection Impact Assessment	<i>A data protection impact assessment (DPIA) should be carried out at the start of any major project involving the use of personal data or if you are making a significant change to an existing process.</i>
	<p>a. Does the project/change being recommended through this paper involve the processing of personal data or special category data or criminal offence data? A definition of each type of data can be found on the Information Commissioner's Office website via the above links.</p>
	<p>b. If yes to question a, have you completed and attached a DPIA including Data Protection Officer advice? N/A</p>
	<p>c. If no to question b, please seek advice from your nominated DPIA assessor or the Information Governance Team at gdpr@medway.gov.uk. N/A</p>
Equality Impact Assessment	<p>a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer. No.</p>
	<p>b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer. No.</p>
	<i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i>
Corporate Plan	<p># 1 People Provide a Proactive, Supportive & Financially Efficient Housing Service: high quality tenant management experienced through a service making full use of its assets. Put Our Customers First: Implement a suite of quality and effective front line service</p>
Climate Change	N/A
Crime and Disorder	N/A

Digital and website implications	N/A
Safeguarding children and vulnerable adults	N/A

Construction Design and Management

Inspection Report

Project		Inspection Ref:	
Principal Contractor		Date of inspection	

This CDM inspection is designed to review the Principal Contractor's Management of Health and Safety on the above site, through their Construction Phase Health and Safety Plan, and that they are discharging their duties in accordance with CDM Regulations 2015 – Regulations 12, 13, 14, Part 4 (Regulations 16-35) and Schedule 2 (Welfare facilities).

Item	Issues for consideration	CDM Requirements	Comments
1	Site security, signage, public safety.	<p>The principal contractor must ensure reasonable steps are taken to prevent unauthorised access onto the construction site. They should liaise with the contractors on site to physically define the site boundaries by using suitable barriers which take account of the nature of the site and its surrounding environment. The principal contractor should also take steps to ensure that only those authorised to access the site do so.</p> <p><i>CDM Regulation 13</i></p>	
2	Is there an established Construction Phase Health and Safety Plan on site that is being developed to reflect current construction work activities?	<p>During the pre-construction phase, and before setting up a construction site, the principal contractor must draw up a construction phase plan or make arrangements for a construction phase plan to be drawn up.</p> <p>The construction phase plan must set out the health and safety arrangements and site rules taking account, where necessary, of the industrial activities taken place on the construction site and, where applicable, must include specific measures concerning work set out in Schedule 3 of the CDM regulations.</p> <p><i>CDM Regulations 12</i></p>	
3	Statutory notices F10, HSE law poster, insurance, site rules, no smoking are being displayed.	<p>Where a project is notifiable, the client must give notice in writing to the Executive as soon as is practicable before the construction phase begins.</p>	

		<p>The notice must:</p> <p>a) contain the particulars specified in Schedule 1.</p> <p>b) be clearly displayed in the construction site office in a comprehensible form where it can be read by any worker engaged in the construction work</p> <p>c) if necessary, be periodically updated.</p> <p><i>CDM Regulation 6</i></p>	
4	<p>Fire safety plan, signage, alarms, fire points and wardens.</p> <p>Emergency services listed and displayed.</p> <p>Evacuation procedures in place with clearly defined emergency routes.</p>	<p>Where necessary in the interests of the health and safety of a person on a construction site, a sufficient number of suitable emergency routes and exits must be provided to enable any person to reach a place of safety quickly in the event of danger and emergency routes or exits must be indicated by suitable signs.</p> <p><i>CDM Regulations 30</i></p>	
5	<p>First aid provisions on site, first aider (appointed person) displayed.</p>	<p>The Principal Contractor must ensure that sufficient First Aid is provided that is commensurate to the possible risks that could arise during the work process.</p>	
6	<p>Accidents, incidents, near-miss reporting, records.</p>	<p>Contractors should provide their employees and workers under their control with the information and instructions they need to carry out their work without risk to health and safety. This must take into account the relevant accident and incident reporting arrangements.</p>	
7	<p>Is a site register maintained on site</p>	<p>The Principal Contractor must ensure reasonable steps are taken to prevent unauthorised access onto the construction site. They should liaise with the contractors on site to physically define the site boundaries by using suitable barriers which take account of the nature of the site and its surrounding environment.</p>	
8	<p>Are site safety inductions given to all contractors and recorded.</p>	<p>The Principal Contractor must ensure every site worker is given a suitable site induction. The induction should be site specific and highlight any particular risks (including those listed in Schedule 3) and control measures that those working on the project need to know about. Particular attention must be given to any works carried out at height i.e in a tower block</p>	
9	<p>Evidence of training for</p>	<p>A contractor must not employ or</p>	

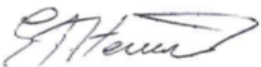
	operatives such as – CSCS, CPCS, CISRS, IPAF etc.	<p>appoint a person to work on a construction site unless that person has, or is in the process of obtaining, the necessary skills, knowledge, training and experience to carry out the task allocated to that person in a manner that secures the health and safety of any person working on the construction site.</p> <p><i>Regulation 15:7</i></p>	
10	Have RAMS supplied by the contractor been reviewed by the Principal Contractor and retained on site.	<p>Designers and contractors must be able to demonstrate they have the health and safety knowledge, skills and experience to carry out the work for which they are seeking appointment.</p> <p><i>Regulation 8</i></p>	
11	Are site audits, inspections and monitoring completed.	<p>Standards should be checked regularly given the rapidly changing nature of the construction site.</p> <p>Effective monitoring involves: using a mix of performance measures – both active and reactive in nature.</p> <p>i) routine checks of site access and work areas and plant and equipment, or health risk management to prevent harm.</p> <p>ii) investigating near-miss incidents and injuries as well as monitoring cases of ill health.</p> <p><i>“Guidance on monitoring”</i></p>	
12	Permit To Work systems in place, registers, certificates.	<p>A Permit to Work system is a formally documented safe system of work designed to prevent accidental injury to operators and damage to plant, premises and product where work with a foreseeably high level of risk is to be undertaken. Such a system is operated, for instance, where people may be entering confined spaces, using highly flammable substances or working on electrical systems.</p>	
13	Temporary works, falsework, design, inspection.	<p>Designers should liaise with any other designers, including the principal designer, so that work can be coordinated to establish how different aspects of designs interact and influence health and safety. This includes temporary and permanent works designers.</p> <p><i>“Cooperating with duty holders”.</i></p>	
14	Hazardous substances,	Where necessary in the interests of	

	COSHH assessments & data sheets, chemical storage, controls evident.	the health or safety of a person on a construction site, suitable and sufficient arrangements for dealing with any foreseeable emergency must be made and, where necessary, implemented, and those arrangements must include procedures for controlling the physical and chemical properties of any substances or materials hazardous to health.	
15	Asbestos, registers, surveys, management, controls, licenced removal, disposal and operative training	All hazardous waste is to be recorded and Waste Transfer Notes recorded.	
16	Is the Traffic Management Plan in place and regularly reviewed / updated, to reflect evolving site works and construction.	The CDM regulations require that traffic routes need to be designed so that pedestrians or vehicles may use it without causing danger to the health or safety of persons near it. <i>Regulation 27</i>	
17	Personal safety awareness, attitude.	The principal contractor is required to liaise with those involved to establish a common understanding of the health and safety standards expected and to gain their cooperation in meeting these standards. <i>Guidance 13</i>	
18	Plant, tools, records, training, inspection, maintenance.	To manage the construction phase, principal contractors must ensure that: ➤ The right plant, equipment and tools are provided to carry out the work involved. <i>Schedule 11</i>	
19	Welfare facilities adequate (HSE. Sheet No: 18)	The Principal Contractor has a duty to ensure that workers are provided with suitable welfare facilities for the duration of the construction work. <i>Schedule 11</i>	
20	Safe access and egress to all work areas.	There must, so far as is reasonably practicable, be suitable and sufficient safe access and egress from every area of the construction site to every other place provided for the use of any person whilst at work. <i>Regulation 17</i>	
21	Site housekeeping, possible slips and trips. Storage of materials.	Each part of the construction site must, so far as is reasonably practicable, be kept in good order and those parts in which construction work is being carried out must be	

		kept in a reasonable state of cleanliness. <i>Regulation 18</i>	
22	PPE – Hi-visibility coat/waistcoat, hard hat, safety footwear, for all operatives. Additional protection (i.e. ear protection) as required.	To manage the construction phase, principal contractors must ensure that: ➤ Effective, preventative and protective measures are put in place to control the risks. <i>Guidance 13</i>	
23	Scaffolding work – good access/ egress, ladders in good order, edge protection, nets, fall-arrest.	The underlying principle of the Work at Height Regulations is that working at height should be avoided wherever possible. If working at height cannot be avoided, prevention is better than mitigating the consequences of a fall. The Work at Height Regulations set out the measures that should be taken to prevent falls when working at height is unavoidable, together, these form the Hierarchy of Control Measures.	
24	Electrical safety – supply, cables and distribution.	Temporary electrical installations are required to be inspected every 6 months.	
25	Excavations, permits, shoring, inspections carried out/recorded, edge protection in place.	All practicable steps must be taken to ensure that no excavation or part of an excavation collapses; no material forming the walls or roof of, or adjacent to, any excavation is dislodged or falls; and that no person is buried or trapped in an excavation by material which is dislodged or falls. <i>Regulation 22</i>	
26	Waste Management, stored correctly, registered with L.A. (if required) hazardous materials labelled.	Construction and demolition waste (CDW) is one of the heaviest and most voluminous waste streams generated.	
27	Design matters	Where the range and nature of risks involved in the work warrants it, the management arrangements should include: “An expectation from the design team in terms of the steps that should be taken within reason to ensure their designs help manage foreseeable risks during the construction phase and when maintaining and using the building once it is built.”	

		<i>Guidance – “ Making suitable arrangements for managing a project.”</i>	
28	Compilation of Information for Health & Safety File	A client must ensure that the principal designer prepares a health and safety file for the project.	

Recommendations

Principal Designer			
Name:	G. T. Hewitt		
Signed:		Date:	

Gravesham Borough Council**Risk Assessment Form**

Group/Unit: DSO Building Management			
Address/Location: Housing Services			
Assessor: Jeff Roberts	Position: Corporate Health and Safety Advisor		
Date: Reviewed 31.03.2021 Nicole Arthur Service Delivery Manager (Housing Repairs)			
Work Activity/Task: Clearing blocked sinks and basins.			
Assessment reference number : O/S 182	Comments : Additional COSHH assessment has been produced for hazardous substances used.		
Risk Calculation: V L = Very low L = Low M = Medium H = High			
<u>Risk Rating</u>	<u>Classification</u>	<u>Action</u>	<u>Priority Code</u>
VL	Very Low	None	Highly unlikely to happen
L	Low	Not Urgent	Unlikely to happen
M	Medium	When possible	Could happen
H	High	Stop	Will happen.
Hazards:	Risks:	Risk Rating:	
1. Disconnecting / re-connecting pipe work.	Personal physical injury. Manual handling injury through poor posture.	M	
2. Working in occupied premises.	Injury to occupants of premises. Customer complaints. Damage to existing health conditions.	M	
3. Failure to use correct personal protective equipment.	Cuts and abrasions to hands. Acid burns and blisters to exposed skin. Exposure to blood borne viruses. Inhalation of harmful gases. Impact injury to feet. Eye damage from contact with chemicals.	H	
4. Using hazardous substance.	Acid burns and blisters. Possible asphyxia from inhalation. Severe eye damage. Harmful if ingested.	M	

Persons at Risk: DSO Building Management staff.

Control Measures:

Existing:

1. Only trained and experienced staff are permitted to undertake these tasks.
Some staff have received manual handling training.
2. Staff are encouraged to assess the affect their activities will have to the safety and health of the occupants of the premises.
3. Operatives are issued with appropriate personal protective equipment to undertake this task.
This includes overalls, safety footwear, gloves (gauntlets), face mask and goggles.
4. Where necessary a drain cleaning substance will be introduced.
All substances are stored within the depot and only released on request.
All substances issued are logged in the operations office.
Only trained, experienced staff are permitted to use hazardous substances.
A safe system of work is in place for the use of chemical sink and basin clearance.

Proposed:

Refresher training manual handling awareness.

Issue safe system of work to all relevant staff.

Maintain a product data file that can be accessed by all operatives.

Develop and deliver training programme for the safe use of chemicals.

Signed:

Date: 31.03.21

Review Date: 31.03.22

Action Plan: No

Safe System of Work

Group/Unit: DSO Building Management

Work Activity/Task: Unblocking sinks and basins using chemicals.

Persons at Risk: DSO Building Management staff and occupants.

Chemicals should only be used for unblocking sinks and basins when all other methods have not been successful.

- Check manufacturer's instructions (COSHH) clearly before using chemicals.
- Advise any occupants of the potential dangers of the chemicals, consider any complication to existing medical conditions.
- Ensure occupants are happy for you to continue process.
- Restrict access to the area, clearly stating intended duration of process.
- Select the appropriate personal protective equipment for the task:
 - a. Protective Clothing
 - b. Gloves (gauntlets)
 - c. Safety footwear
 - d. Goggles
- Apply chemicals to the blocked sink or basin.
- Allow sufficient / recommended time for chemicals to activate.
- Stay away from the immediate area during this time.
- Never leave the treated area unattended.
- When process is complete flush away and test outlet.
- If successful, thoroughly clean equipment and surrounding area before leaving.
- Return all unused chemicals to secure storage point.
- Carefully and safely dispose of empty container.

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Classification: Public

Key Decision: No

Gravesham Borough Council

Report to: Housing Services Cabinet Committee

Date: 03 February 2022

Reporting officer: Victoria May, Service Manager (Housing Options)

Subject: Temporary Accommodation Policy

Purpose and summary of report:

To outline to the Committee a draft policy that details the councils approach to placements into temporary accommodation, including consideration of the statutory requirements on Councils and introducing charging under s206(2) Housing Act 1996 to charge homeless people for temporary accommodation. Members are requested to provide feedback on the policy prior to being ratified by the Chair of Housing Services Cabinet Committee as Cabinet Member for Housing.

Recommendations:

1. For Members to discuss and provide feedback on the draft Temporary Accommodation Policy prior to being ratified by the Cabinet Member for Housing Services.

1. Background

- 1.1 The Homelessness Code of Guidance for Local Authorities, published by MHCLG states (at paras 17.48 -17.62) that housing authorities are advised to develop policies for the procurement and allocation of accommodation which will help ensure that suitability requirements, including the location of the accommodation, are met.
- 1.2 The draft Temporary Accommodation Policy as shown in Appendix 2 has taken the statutory guidance into account when making decisions about out-of-borough temporary accommodation placements.
- 1.3 The Council has a duty under the Homelessness Reduction Act 2018 to prevent and relieve homelessness. Where homelessness cannot be prevented and cases move to relief duty, temporary accommodation (TA) may be needed until alternative settled accommodation is secured or the relief duty ends.
- 1.4 Whilst the majority of TA placements are currently offered within the borough of Gravesham, increasing demand coupled with the decreasing supply of suitable accommodation locally inevitably means that the service is reliant on nightly-paid options both in and outside the Gravesham borough.
- 1.5 The Council aimed to use its own housing stock however as homeless approaches increase, over time this has had to be supplemented with nightly paid

units managed by private sector housing providers both within and outside the borough. It is important that the council is satisfied that accommodation offered to households is suitable and reasonable to occupy. In addition, with the TA budget overspent it is important to obtain reasonable contributions towards the temporary accommodation costs, which are impacting the general fund.

2. Current Position

- 2.1 There are currently 161 households in temporary accommodation of which 76 are GBC accommodation and 85 are in nightly-paid accommodation. 112 households have been accepted as homeless under the Housing Act 1996 (amended 2202) and therefore there is a duty to find a housing pathway so that the Council can discharge their legal duty to them.
- 2.2 This policy sets out ten key headings and details the Councils approach to the placements of households into temporary accommodation, both in and out of the borough. It covers interim placements made under Section 188 & Section 202 of the Housing Act 1996, whilst investigations are conducted as well as when households are accepted as homeless under Section 193.
- 2.3 The policy takes into account the statutory requirements on local authorities in respect of the suitability of accommodation, including the suitability of Accommodation orders, the Homelessness code of guidance, and any supplementary guidance. It has been formulated having regard to the need to safeguard and promote the welfare of children, as required by section 11 of the Children Act 2004.
- 2.4 The Housing Act 1996 places a statutory duty on local authorities to provide interim accommodation under Section 188 of the act. It also gives the Council the right to make a reasonable charge for the accommodation provided. It is reasonable for the council to raise a charge equivalent to the relevant Local Housing Allowance rate on forms of temporary accommodation.
- 2.5 The Service Manager has shared the draft policy with the Director of Housing, the Housing Options Service and the Cabinet Member for Housing Services to obtain comments and feedback which have been concluded in the draft attached.

3. Working Practice

- 3.1 The Service requires this framework to safeguard their decision-making and to ensure all facts have been taken into consideration. This also provides a transparent way of dealing with customers and removes 'opinion' to ensure consistent 'policy'.
- 3.2 The Temporary Accommodation Officer will monitor charging and arrears and to assist with this piece of work a bolt-on to Locata has been purchased which enables an efficient workflow on temporary accommodation. It will capture tasks such as anti-social behaviour, inspections, arrears and will produce a dashboard which will enable the service to better understand the demands of this role and workflow.

4. Summary

- 4.1 The Service Manager is seeking views on the policy prior to it being ratified by Cabinet Member for Housing Services and implemented by officers.

IMPLICATIONS	APPENDIX 1
Legal	The Council has a statutory duty to provide temporary accommodation. The procedure attached to this paper will help ensure that the Council's duties to provide suitable temporary accommodation for homeless households are met.
Finance and Value for Money	The policy is intended to set out the Council's approach to charging customers for temporary accommodation. The Council's overall objective is to minimise the additional financial and other burdens placed on homeless households that require TA by the effective management of the limited number of suitable TA units within the borough and ensuring we maximise income.
Risk Assessment	Failure to provide good quality emergency temporary accommodation could leave the council exposed to legal challenge through judicial review.
Data Protection Impact Assessment	<p><i>A data protection impact assessment (DPIA) should be carried out at the start of any major project involving the use of personal data or if you are making a significant change to an existing process.</i></p> <p>a. Does the project/change being recommended through this paper involve the processing of personal data or special category data or criminal offence data? A definition of each type of data can be found on the Information Commissioner's Office website via the above links.</p> <p>b. If yes to question a, have you completed and attached a DPIA including Data Protection Officer advice?</p> <p>c. If no to question b, please seek advice from your nominated DPIA assessor or the Information Governance Team at gdpr@medway.gov.uk.</p>
Equality Impact Assessment	<p>a. Does the decision being made or recommended through this paper have potential to cause adverse impact or discriminate against different groups in the community? If yes, please explain answer. No</p> <p>b. Does the decision being made or recommended through this paper make a positive contribution to promoting equality? If yes, please explain answer. Yes. it ensures that all homeless households requiring TA are dealt with in a consistent manner.</p> <p><i>In submitting this report, the Chief Officer doing so is confirming that they have given due regard to the equality impacts of the decision being considered, as noted in the table above</i></p>
Corporate Plan	In line with the objectives of the Corporate Plan 2019-23 strategic objective #1, People, the Temporary Accommodation Placement Procedure will help the council to meet the housing needs of all residents including vulnerable people. It will also compliment #2 - Stronger Gravesham and #4 - Sound and self-sufficient council
Climate Change	N/A
Crime and Disorder	The provision of suitable TA enhances the Council's ability to meet the needs of homeless households and helps prevent them being victims of crime or becoming involved in criminal activities

Digital and website implications	N/A
Safeguarding children and vulnerable adults	Safeguarding children and vulnerable adults The provision of suitable TA will contribute towards meeting the needs of / safeguard children and vulnerable adults.

Gravesham Borough Council – Temporary accommodation Policy Final

Document Control

Responsible Department	Housing
Author	Victoria May, Service Manager (Housing Options)

Revision History

Date	Previous Version	Description of Revision
	N/A	N/A

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1. Introduction

In line with the Corporate Plan 2019-2023, Gravesham Borough Council strives to make the best use of its stock and we want to provide households with a good quality temporary accommodation.

This document sets out the council's approach to the placements of households into temporary accommodation, both in and out of the borough. It covers interim placements made under Section 188 & Section 202 of the Housing Act 1996, whilst investigations are conducted as well as when households are accepted as homeless under Section 193.

The policy takes into account the statutory requirements on local authorities in respect of the suitability of accommodation, including the suitability of Accommodation orders, the Homelessness code of guidance, and any supplementary guidance. It has been formulated having regard to the need to safeguard and promote the welfare of children, as required by section 11 of the Children Act 2004.

As per section 208 of the Housing Act 1996, and chapters 16 and 17 of the Homelessness Code of Guidance, so far as reasonably practical, the Council seeks to accommodate homeless families within its Borough and always consider the suitability of the accommodation, taking into account the circumstances of the individual household. However, due to an acute shortage of affordable housing, and temporary accommodation locally, consideration needs to be given to accommodation outside of the Borough to ensure homeless households can be suitably housed.

When determining whether it is reasonably practical to secure temporary accommodation within Gravesham, as opposed to simply what is reasonable, the cost of the accommodation is a relevant and proper consideration given the intensive pressures on housing stock in Gravesham and high demand for a range of accommodation with a limited budget.

The Local Housing Allowance (LHA) is used to work out how much Housing Benefit a tenant will receive to pay their rent. LHA rates depend on who lives in the household, and the area they are making their claim. Applicants will be expected to ensure any top of the rent is paid. Applicants in receipt of universal credit will be expected to notify the Department for Work and Pensions (DWP) that they are in temporary accommodation so that Housing Benefit can be paid to the local authority to cover the charge.

This policy details how applicants will be prioritised for temporary accommodation in and outside the Borough.

Reference in this policy to 'The Council' means Gravesham Borough Council.

2. Approach to meeting demand for temporary accommodation

Gravesham Borough Council has limited resources; however, the council aims to ensure a supply of good-quality temporary accommodation. This includes:

- The use of private providers to supply nightly paid properties.
- Use of existing and future council and housing association stock.
- Exploring options for working with letting agencies to increase the number of properties available to homeless households.
- Working with supported housing providers to increase provision and enable access.

- Seeking to increase the number of private sector landlords willing to let directly to homeless households through the council's Landlord Liaison Team.

The approach taken is adopted by the council's aim to prevent homelessness as detailed within the Homelessness and Rough Sleeping Prevention Strategy 2019-2024.

3. Suitability of accommodation

This policy takes into account the statutory requirements on local authorities in respect of the suitability of accommodation, including the Suitability of Accommodation Order 2012 and has regard to the need to safeguard and promote the welfare of children as required by section 11 of the Children Act 2004.

When deciding if a temporary accommodation placement is suitable, consideration will be given to Chapter 17 of the Homelessness Code of Guidance for Local Authorities, which states that the following factors need to be taken into account:

- Location – if suitable, affordable accommodation is available in the area, applicants will be housed in Gravesham, allowing them to maintain any established links with services and social/support networks. However, when there is a lack of suitable accommodation within the borough, we will look to our neighboring local authorities first before considering the rest of Kent to meet the council's statutory housing duty.
- Size, condition and facilities – accommodation must provide adequate space and room standards for the household and be fit to inhabit. Households in temporary accommodation may be placed into units with one bedroom less than they would be entitled to on a permanent basis, with the expectation, the living rooms provide dual purpose as a living and sleeping area. The style of the decoration/furniture, the layout/type of accommodation, provision of parking and lack of access to a garden are extremely unlikely to be acceptable reasons for a refusal.
- Health Factors – the Council will consider health factors such as an ability to manage stairs, the care and support provided by other statutory agencies or the need to access any specialist medical services that are only available in Gravesham. If the applicant or a member of the resident household is citing medical grounds that were not identified during the initial assessment, the applicant will be asked to submit medical information within a reasonable period. The key test in determining the impact of medical issues is whether the condition itself makes the housing offered unsuitable. Problems such as depression, asthma, diabetes or back pain would not normally make a property unsuitable, as the problems would persist in any type of accommodation. Where it is practical to do so, prior to being placed in temporary accommodation, homeless households will be asked to complete a vulnerability and suitability assessment form. This form will allow officers to assess suitability of any accommodation provided.
- Education – attendance at local schools will be considered however will not ordinarily be considered a reason to refuse accommodation. Priority will be given to special educational needs and students who are close to taking public examinations in determining priority for placements in the borough. Gravesham Borough Council will seek to ensure all placements are within 45 minutes travelling distance each way of any primary schools attended. For secondary school children the length of journey should be no more than 75 minutes each way. This is in line with Kent County Council's guidance as to what is considered reasonable for a child to travel to school. The Council should also make reasonable efforts to ensure arrangements are put in place to minimise the disruptions to the education of

children and young people, particularly (but not solely) at critical points such as leading up to taking GCSE or equivalent examinations.

- Employment – the Council will consider the need of applicants, who are in paid employment, to reach their normal workplace from the accommodation that is secured. The Council should also make reasonable efforts to ensure any disruption to caring responsibilities that may be impacted by any disruption to employment is kept to a minimum
- Proximity to services – the Council will consider the proximity to public transport, primary care services and local services in the area in which the accommodation is located.
- The need to safeguard and promote the welfare of any children in the household – if not already identified the council will seek to identify any particular needs of the children in the household. It will have regard to the need to safeguard and promote the welfare in making decisions on whether the offer is suitable, although it has to be remembered that almost all families seeking temporary accommodation are families with children.
- Any special circumstances – the Council will consider any other reasons put forward by the applicant and come to an overall view whether the offer is suitable.

Assessments with regard to suitability of a temporary accommodation placement will be completed on a case-by-case basis to ensure any temporary accommodation offered is considered reasonable and suitable for the household involved. These assessments are made within the context of the accommodation and resources that are available to the Council.

The individual needs and requirements of a household will be assessed by a Homeless Officer to confirm whether an allocation would be suitable. Consideration is given to any potential risks an applicant may pose to existing residents or members of the public.

4. Hotel placements

Circumstances may arise which require short notice placements of households into emergency temporary accommodation. At this time, options available can be very limited. In these cases, the use of hotel accommodation may be the only option available to fulfil the council's temporary accommodation duty however this is a last resort. In addition, if an applicant contacts the Council outside of office hours and requires emergency accommodation, hotel accommodation is often the primary option.

Consideration is given to the Homelessness Code of Guidance chapter 22, which states that hotel accommodation is not to be regarded as suitable for care leavers under the age of 25 or applicants with dependent children. Therefore, hotel placements for households of this type are only to be used if no other accommodation is available. The council aims for all hotel placements to be as short as possible. However, there may be exceptions to this if no other suitable accommodation options can be identified within the six-week period. Whenever an applicant is accommodated in hotel accommodation, attempts will be made to identify alternative temporary accommodation as soon as possible.

5.0 Out-of-borough placements

Access to nightly paid temporary accommodation in the borough is limited. In addition, neighbouring authorities have similar supply issues. Wherever possible, the Council will seek to provide temporary accommodation locally within the borough. However, where this is not possible the Council will provide accommodation outside of the borough.

In some circumstances, it may be more appropriate for a placement outside of the area to be arranged. For example where an applicant may be at risk of violence within the borough. We will take into account any advice provided by specialist services to ensure risks are managed and we secure the most appropriate placement for the household.

6.0 Temporary accommodation offers and refusals

The Council seeks to place all applicants in self-contained accommodation where possible. However, due to the significant demand and shortage of accommodation, households placed under the council's duty to accommodate (pursuant to Section 188 of the Housing Act 1996), may initially be placed in accommodation that has shared facilities. When accessing accommodation through the out-of-hours service or in the event of a major emergencies accommodation households could be offered nightly paid hotel/bed and breakfast.

Gravesham will consider the households circumstances before an offer of accommodation as set out in the Code of Guidance chapter 17 (Suitability of accommodation). Whilst there is no obligation to allow applicants to view accommodation prior to acceptance, the Council will make efforts to provide notice of a move so that households can view the area offered.

For applicants placed outside the borough, if they have no benefits in payment or any other financial means to travel to the arranged emergency placement then in exceptional circumstances the Council can arrange a single one off travel warrant. A financial assessment will be conducted and this would need to be approved by a Team manager.

The Temporary Accommodation Officer will make an introductory telephone call when the customer is in the temporary accommodation and will reiterate the importance of housing benefit, charging of accommodation, applying on the housing register and ensuring the quality of accommodation is satisfactory.

If a household is offered alternative temporary accommodation (e.g. currently placed out of the borough and have been offered a GBC vacancy) there will be minimal notice provided, as the Council is unable to hold a vacant temporary accommodation unit. The Council will try to offer 24 hours' notice to move however, this may not always be possible.

If an applicant refuses an offer, they will be asked to provide their reasons for doing so in writing and the consequences of refusal will be clearly explained. This will apply to new applicants being placed under section 188 of the Housing Act 1996, as well as those being transferred to alternative interim or temporary accommodation. Consideration will be given to reasons for refusal. If it is then accepted, the

accommodation is unsuitable, the offer will be withdrawn and another suitable offer made.

Where applicants refuse suitable temporary accommodation and the council considers their reasons for refusal to be unacceptable there will be no further offers of accommodation made and applicant will be required to make their own arrangements. A referral to social services can be made if the homeless household includes anyone who is vulnerable, pregnant or has a dependent child.

Where the council has decided applicants placed under its interim duty to accommodate pursuant to Section 188 of the Housing Act 1996 are not owed a further accommodation duty, they will be asked to leave. The Council will provide a reasonable period of notice after being notified of the decision to enable alternative accommodation to be sought. The length of time given will depend upon the circumstances of the household and will be at the discretion of the case officer. In all cases, where there are dependent children or vulnerable adults, social services will be notified that the council's duty to provide accommodation will be brought to an end.

7.0 Costs incurred by temporary accommodation

The cost of providing temporary accommodation has increased significantly over the last few years. This is due to a number of factors including, but not limited, to:

- applicants having to stay in temporary accommodation for longer periods of time due to a declining supply of social housing lets
- a reduction in the supply of private rented housing being available at an affordable rent level.
- Changes in legislation and new priorities for Gravesham

The Housing Act 1996 places a statutory duty on local authorities to provide interim accommodation under Section 188 of the act. It also gives the council the right to make a reasonable charge for the accommodation provided.

It is reasonable for the council to raise a charge equivalent to the relevant local housing allowance rate on all temporary accommodation. It is considered a charge levied at this rate is reasonable. In addition for households who are temporarily placed within our own stock, it is necessary to add a homeless service charge that covers management of these units.

Homeless households are able to seek help from Housing Benefit towards the cost of their accommodation. Claims for help with temporary accommodation costs are exempt at present from Universal Credit. Homeless households will be supported to complete a Housing Benefit form and submit this to the relevant section. It is the responsibility of the household to ensure they supply the Housing Benefit team with any supporting evidence required to complete their claim. In circumstances where an applicant is awarded full Housing Benefit, no further contribution will be required.

Where an applicant is not eligible to receive any help from Housing Benefit they will be expected to pay a reasonable charge for the accommodation provided. This charge will be at a level equivalent to the relevant Local Housing Allowance.

In the event a charge is due and not received from the applicant, the council will send an arrears letter. If no attempt has been made to resolve the arrears then a second arrears letter will be sent followed by a final notice of eviction. This will detail their last night in accommodation due to failing to maintain their charge. The council has the right to end the accommodation and discharge the relevant duties.

Where an applicant is placed in self-contained accommodation, they will be responsible for meeting the costs of their utilities and Council Tax. Applicants are able to apply for Council Tax relief. However, they will need to speak with the Council Tax team in the area in which they are placed.

Where there is an opportunity for 'move on', customers' temporary accommodation account charge should be up to date and not have an outstanding balance. Where there are monies owed, the customer will be provided the opportunity to clear this or the offer may be withdrawn.

8.0 Appeals relating to temporary accommodation

There is no legal right of review against the suitability of accommodation offered to applicants under section 188 of Housing Act 1996 although applicants can apply for judicial review through the courts. Applicants can request for a reconsideration of the suitability of their temporary accommodation at any time.

Where the Council has accepted a full housing duty under section 193 of the Housing Act 1996, there is a right to request a review of the suitability decision pursuant to section 202 of that act. Applicants can request a review of the suitability of their temporary accommodation at any time either verbally or in writing. This will be an impartial review carried out by the Housing Options Manager. If an internal review concludes the accommodation is suitable and the applicant is dissatisfied with this response, they have a further right of appeal to the County Court on a point of law.

9.0 Equality and diversity

This Policy works in conjunction with the Council's Equality Policy. Gravesham Borough Council is committed to treating people with dignity and respect. This applies to colleagues, customers and members, all of whom undertake not to discriminate directly or indirectly or victimise because of race, colour, ethnic or national origin, nationality, citizenship, sex, sexual orientation, marital status, disability, age, religion or political persuasion. All information/ literature will be made available in other formats, or translated upon request.

The Council is committed to addressing issues of financial inclusiveness by referencing its Vulnerability Policies. Front line staff will signpost customers to external advice agencies providing additional help and support with regard to equalities, ensuring full use of available resources.

10. Review

The policy will be monitored and reviewed within two years or more frequently as changes in legislation, including benefits entitlement, may dictate. The Director of Housing can make amendments as and when required in consultation with the Cabinet Member for Housing Services.

DRAFT

The Temporary Accommodation Policy details the Councils approach to placements into temporary accommodation, including consideration of the statutory requirements on Councils and introducing charging under s206(2) Housing Act 1996 to charge homeless people for temporary accommodation.

1 Identify the aims of the policy/service/function and how it is implemented.			
	Key questions	Answers / Notes	Actions required
1.1	Is this an existing or a new policy / function?	New policy	
1.2	Who defines or defined the policy/function?	The policy takes into account the statutory requirements on local authorities in respect of the suitability of accommodation, including the suitability of Accommodation orders, the Homelessness code of guidance, and any supplementary guidance. It has been formulated having regard to the need to safeguard and promote the welfare of children, as required by section 11 of the Children Act 2004.	
1.3	Who is the policy/function being aimed at?	All households that are placed into accommodation made under Section 188 & Section 202 of the Housing Act 1996, whilst investigations are conducted as well as when households are accepted as homeless under Section 193.	Raise awareness of the policy within the service to officer level.
1.4	Who implements the policy/function?	Central Govt provide guidance Lead Officer – V May Key Officers – Operational responsibility Housing Options Service Doing the work – Homeless Officers / Temporary Accommodation Officers	Regular review of case law round temporary accommodation and/change of Local Housing Allowance rates
1.5	What is the objective or purpose of the policy/service/function?	The Homelessness Code of Guidance for Local Authorities, published by MHCLG states (at paras 17.48 -17.62) that housing authorities are advised to develop policies for the procurement and allocation of accommodation which will help ensure that suitability requirements, including the location of the accommodation, are met. This policy has taken the statutory guidance into account when making decisions about out of borough temporary accommodation placements.	Review meetings / level of communication between officer to ensure better working.
1.6	What outcomes do you want to achieve with this policy / function and for whom?	Achieving well-balanced fair decisions to customers in crisis who have to go into temporary accommodation. Corporately ensure officers are protected and have a framework when	

1 Identify the aims of the policy/service/function and how it is implemented.			
	Key questions	Answers / Notes	Actions required
		<p>decisions making.</p> <p>To guide officers in the process – ensure consistency of approach.</p>	
1.7	Do these outcomes complement or hinder other policies, values or objectives of the organisation?	<p>Complement</p> <ul style="list-style-type: none"> • Perception among customers of fairness of the allocation of temporary accommodation • Audit to ensure the service can demonstrate a consistent approach with temporary accommodation placements • Enables us to sustain customers in accommodation by closely managing this area <p>Hinder</p> <ul style="list-style-type: none"> • As numbers rise there is more pressure to move households out of temporary accommodation. 	
1.8	What factors or forces are at play that could contribute or detract from the outcomes identified earlier?	<p>Contribute</p> <ul style="list-style-type: none"> • Remove the pressure from homeless officers when making decisions as this provides a consistent approach • Provides applicants with an understanding on the considerations taken when an offer of accommodation has been made. • Failure to provide good quality emergency temporary accommodation could leave the council exposed to legal challenge through judicial review <p>Detract</p> <ul style="list-style-type: none"> • Supply of local temporary accommodation • Supply of adapted temporary accommodation • The cost of temporary accommodation to the council. 	

1 Identify the aims of the policy/service/function and how it is implemented.			
	Key questions	Answers / Notes	Actions required
1.9	How does the organisation interface with other bodies in relation to the implementation of this policy / function?	The Council has a statutory duty to provide temporary accommodation. The policy is to help ensure that the Council's duties to provide suitable temporary accommodation for homeless households are met. This practice can be shared with other bodies to raise awareness of Graveshams policy.	
1.10	Taking the nine protected characteristics is there anything in the policy or how the service is delivered that could discriminate or disadvantage any of these groups?	<p>Age This policy doesn't address any difference that may be encountered in relation to people from different age brackets.</p> <p>Marriage and Civil Partnership This policy doesn't address any difference that may be encountered in relation to people who are married or in a civil partnership.</p> <p>Race This policy doesn't address any difference that may be encountered in relation to people from different backgrounds.</p> <p>Pregnancy and maternity This policy does set out consideration for households that have health factors and that have care and support provided by other statutory agencies or the need to access any specialist medical services that are only available in Gravesham.</p> <p>Religion and belief This policy doesn't address any difference that may be encountered in relation to people from different backgrounds.</p>	

1 Identify the aims of the policy/service/function and how it is implemented.			
	Key questions	Answers / Notes	Actions required
		<p>Sexual Orientation This policy doesn't address any difference that may be encountered in relation to people from different backgrounds.</p> <p>Gender This policy doesn't address any difference that may be encountered in relation to people from different backgrounds.</p> <p>Gender Reassignment This policy does set out consideration for households that have health factors and that have care and support provided by other statutory agencies or the need to access any specialist medical services that are only available in Gravesham.</p> <p>Disability This policy does set out consideration for households that have health factors and that have care and support provided by other statutory agencies or the need to access any specialist medical services that are only available in Gravesham.</p>	
1.11	From your perspective, how is the policy actually working in practice for each equalities group?	N/a at this stage as it is a new policy.	

2 Consideration of available data, research and information			
	Key questions	Answers / Notes	Actions required
2.1	What do you already know about who uses and delivers	There are currently 161 households in temporary accommodation of which 76 are GBC accommodation and 85 are in nightly-paid accommodation. 112	All staff to be made familiar with the new

	<p>this service?</p>	<p>households have been accepted as homeless under the Housing Act 1996 (amended 2202) and therefore there is a duty to find a housing pathway so that the Council can discharge their legal duty to them.</p> <p>Officers are already using Locata to log data and a new spreadsheet has been devised by the Temporary Accommodation Officer to monitor these households more carefully.</p> <p>A new bolt-on to the Housings Locata system has been purchased and the software has been built. This will enable all TA management related subjects to sit here and enables a workflow on a dashboard.</p>	<p>Locata TA system.</p> <p>In depth training with the TA officer.</p>
<p>2.2</p>	<p>What additional information is needed to ensure that all equality groups' needs are taken into account?</p>	<p>Introductory letter needs to be sent to all households in temporary accommodation</p> <p>All cases need to be checked that they have a completed suitability questionnaire.</p> <p>All nightly paid accommodation needs to be inspected under Health and Safety Rating System (HHSRS) to ensure accommodation is suitable.</p>	<p>Drafted letter needs approval and letters to be sent.</p> <p>Providers need to be contacted to inform them of the councils intentions</p> <p>Cases need to be referred to PSH</p> <p>PSH need to manage this area of work and also fall back on qualified Landlord Liaison Officers to assist in inspection</p> <p>All cases need to be written up and imported onto the new Locata TA management system</p> <p>All cases to be verified to ensure there is a suitability questionnaire on file. If not, Homeless Officers will need to complete one.</p>

2.3	How are you going to go about getting the extra information that is required?	To be considered.	
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3			
Formal consultation			
	Key questions	Answers / Notes	Actions required
3.1	Who do we need to consult with?	No formal consultation is required. However, consultation has already taken place with The Housing Options Team, Director of Housing and Cabinet Member for Housing Services.	

4			
Assessment of impact			
	Key questions	Answers / Notes	Actions required
4.1	Have you identified any differential impact and does this adversely affect any equalities groups?	No discrimination / differential impact identified. Most of the actions are service improvements for all users.	
4.2	If there is an adverse impact can it be avoided, can we make changes, can we lessen it etc?	N/a	
4.3	If there is nothing you can do, can the reasons be fairly justified?	N/a	

5			
Assessment of impact			
	Key questions	Answers / Notes	Actions required

5.1	Do any of the changes in relation to the adverse impact have a further adverse affect on any other group?	N/a	
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