
Subject:	HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2025-2030
Meeting and Date:	Cabinet – 2 December 2024
Report of:	Rachel Collins, Head of Housing
Portfolio Holder:	Councillor Pamela Brivio, Portfolio Holder for Housing, Skills and Education
Decision Type:	Key Decision
Classification:	Unrestricted

Purpose of the report: To provide detail in relation to the Homelessness and Rough Sleeping Strategy 2025-2030 (“the Strategy”) and seek Cabinet approval for the Strategy to be adopted.

- Recommendation:**
1. Cabinet approves and adopts the proposed Strategy.
 2. Cabinet delegates authority to the Strategic Director (Finance and Housing), in consultation with the Portfolio Holder for Housing, Skills and Education, to make minor amendments to the Strategy as required.
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1. Summary

- 1.1 There is a nationwide increase in homelessness and the cost of homelessness to local authorities. Dover District Council (“the Council”) is affected by this but is not an outlier. Since 2019/20 the Council has assessed 3,478 households of which 79% were owed a duty, and on average there are around 177 households in temporary accommodation (TA) per financial quarter. Between 2019/20 and 2023/24 the Council spent almost £8 million (gross total) on TA, which equates to around £1.6 million per year (gross total).
- 1.2 Under Sections 1 to 3 of the Homelessness Act 2002 all local authorities are required to produce a Homelessness Strategy every five years. From 2018, the Government included responsibility for Council’s to consider rough sleeping as part of the overall strategic objectives.
- 1.3 The existing Council Strategy covered the period between 2020-2024. The new Strategy will replace this and operate over the next 5 years, between 2025-2030. A copy of the Strategy is attached to this report as Appendix 1 and a summarised version as Appendix 2.

2. The Strategy

- 2.1 The Council’s renewed Strategy has been developed in accordance with the requirements set out in the Homelessness Act 2002 and the Homelessness Code of Guidance for Local Authorities. This includes:
 - (a) Conducting a review of homelessness and rough sleeping in the district.
 - (b) Consulting with public authorities and statutory and non-statutory services on the objectives, aims and direction of the Strategy.
- 2.2 The focus of the Strategy centres around five strategic priorities that the Council with support from partner organisations, will work towards achieving over the next five-year

period. The strategic priorities align with the Council's duties and obligations as set out in homelessness legislation, as well as the priorities within the Council's Corporate Plan 2023-2027. The strategic priorities are:

- (a) Early intervention and prevention
 - (b) Improve advice, information and options
 - (c) Increase available affordable housing and reduce our reliance on private sector temporary accommodation
 - (d) Use available resources more effectively
 - (e) Reduce and work towards ending rough sleeping
- 2.3 Whilst homelessness accommodation might either be 'temporary accommodation' (utilised whilst making enquiries and up to the point of a decision) or 'interim accommodation' (accommodating people and families from the time the statutory duty is accepted), the Strategy refers to 'temporary accommodation' covering either of these accommodation types.
- 2.4 The Strategy includes an action plan that sets out what actions should be taken to meet the aims of each strategic priority.
- 2.5 The following teams have been involved or consulted with during the development of the Strategy:
- (a) Housing Options
 - (b) Legal
 - (c) Corporate Services (Equality)
 - (d) Accountancy

Homelessness and Rough Sleeping Review

- 2.6 A review of homelessness and rough sleeping in the district was conducted over a 5-year period between 2019/20 – 2023/24. Several resources were used to complete the review. These included:
- (a) MHCLG – Live tables on Homelessness
 - (b) MHCLG – Rough sleeping annual snapshot tables
 - (c) The Office of National Statistics
 - (d) The Housing Waiting List (Huume)
- 2.7 The Review is attached as Appendix 3 of this report, however in summary the Review has shown that over the 5-year period:
- (a) The total cost of homelessness continued to increase on average by 26% each year, and in 2023/24 the cost had doubled since 2019/20.
 - (b) In 2023/24 the Council spent almost £2.5 million (gross cost) on TA, almost double the amount spent in 2019/20.
 - (c) The Council has assessed 3,478 households of which 79% were owed support by the Council, either to prevent them becoming homeless or to provide relief from homelessness.
 - (d) Based on quarterly returns, on average 177 households were living in temporary accommodation per quarter. 53% of this average (94) were households with dependent children. To date, there are in the region of 300 households living in TA in the district.

- (e) The number of individuals sleeping rough in the district on any given night has fluctuated but has reduced significantly from 20 in 2018 to 5 in 2021. However, the figure has increased; in 2023 it was estimated that there were 9 rough sleepers in the district.
- 2.8 The review has been used to inform the focus of the Strategy's priorities between 2025-2030. A full copy of the review will be made available on the Council's website. Paper copies will also be kept for inspection purposes, and for residents where this is requested.

Consultation

- 2.9 Statutory and non-statutory organisations were invited to attend Focus Group sessions in April 2024 to discuss the current and future impacts to homelessness and rough sleeping in the district, and to feedback / comment on the proposed strategic priorities.
- 2.10 A wider consultation was carried out on a draft version of the Strategy over a 5-week period between August-September 2024, involving in-person meetings with agencies and service users. An email was sent to local authorities, public authorities, statutory and non-statutory services operating in the district inviting them to complete a survey and provide feedback on draft strategy documents.
- 2.11 The Dover District Tenants Consultative Group (DDTCG) were also consulted on the summary of the Strategy on 1 October 2024. The feedback on the strategic priorities of the strategy was positively received by the Group.
- 2.12 Feedback and comments throughout each consultative stage have been incorporated as part of the review and development of the draft Strategy.

3. Monitoring and Implementation

- 3.1 The Strategic Housing team and the Housing Options team will regularly monitor the progress of the Strategy's action plan, and factor this into the Councils performance monitoring processes.
- 3.2 The monitoring of rough sleeping in the district is overseen by the Rough Sleepers Case Review meetings which comprises of Council Officers, public authorities and other statutory and non-statutory organisations. However, information regarding rough sleeping will also be factored into the Councils performance monitoring.
- 3.3 The Strategy and Action Plan if approved, would be effective from 1 January 2025, and for the-monitoring of the Strategy to commence from this date.
- 3.4 A copy of the Strategy and Action Plan will be made available on the Council website. Paper copies will also be available for inspection, and for residents where these are requested.

4. Equality Impact Assessment

- 4.1 In accordance with the Council's Public Sector Equality Duty (PSED) (Section 149 of the Equality Act 2010), an Equality Impact Assessment (EIA) has been completed for the Strategy (Appendix 4). The overarching aim of the Strategy is to have a positive impact to individuals and households who are homeless or at risk of being homeless, however, in conducting the assessment some potential negative impacts have been identified. Mitigative actions have been identified for these impacts.

5. Identification of Options

- 5.1 Option A: Cabinet agrees to the recommendations of this report.
- 5.2 Option B: Cabinet does not agree to the recommendations of this report.

6. Evaluation of Options

6.1 Option A is the preferred option for the following reasons:

- (a) The Council will be complying with the legislation relevant to the prevention and relief of homelessness. Therefore, adoption of the Strategy will allow the Council to fulfil its statutory duties.
- (b) The Council will have a renewed and updated Strategy that better reflects the current environment and the resources available to prevent and relieve homelessness and rough sleeping in the district.
- (c) A full consultation exercise has been undertaken and the feedback from this taken into account when finalising the final draft of the Strategy.

6.2 Option B is not the preferred option since it would be counterproductive to the points raised in 5.1 and would result in the Council being non-compliant with legislation and regulations.

7. Resource Implications

Legal Implications

7.1 The primary homelessness legislation, Part 7 of the Housing Act 1996 ('the Act'), as amended, provides statutory under-pinning for action to prevent homelessness and provide assistance to people threatened with or who are actually homeless:

- (a) Under section 179(1) of the Act, authorities must provide information and advice on: a. preventing homelessness; b. securing accommodation when homeless; c. the rights of people who are homeless or threatened with homelessness, and the duties of the authority; d. any help that is available from the authority or anyone else for people in the authority's district who are homeless or may become homeless (whether or not they are threatened with homelessness); and, e. how to access that help.
- (b) Under section 188(1) of the Act housing authorities are to secure that accommodation is available for an applicant (and their household) if they have reason to believe that the applicant may be homeless; eligible for assistance; and, have a priority need.
- (c) Under section 193 of the Act if homelessness is not successfully prevented or relieved, a housing authority will owe the main housing duty to applicants who are eligible, have a priority need for accommodation and are not homeless intentionally. Under the main housing duty, housing authorities must ensure that suitable accommodation is available for the applicant and their household until the duty is brought to an end.
- (d) Under section 195 where applicants are threatened with homelessness and eligible for assistance, housing authorities must take reasonable steps to help prevent their homelessness.

7.2 There are a number of supplementary provisions when discharging its housing duties under Part 7, such as:

- (a) When a housing authority makes inquiries to determine whether an applicant is eligible for assistance and owed a duty under Part 7, it may also make inquiries under section 184(2) of the Act to establish an applicant's local connection.
 - (b) The Council must secure suitable accommodation (section 210 of the Act).
 - (c) So far as reasonably practicable, secure that accommodation is available for the applicant's occupation in their its own district (section 208(1) of the Act).
- 7.3 Housing authorities should be mindful of duties under the Care Act 2014 including those relating to assessment and adult safeguarding; and the use of Care Act powers to meet urgent care and support needs where an assessment has not been completed.
- 7.4 The Domestic Abuse Act 2021 amends Part 7 of the Housing Act 1996 to strengthen the support available to victims of domestic abuse. The Act extends priority need to all eligible victims of domestic abuse who are homeless as a result of being a victim of domestic abuse.
- 7.5 The Council is also under a general duty, pursuant to Section 11 of the Children Act 2005 to have regard to the need to safeguard and promote the welfare of children within the district. In developing or modifying a homelessness strategy the Council must have regard to:
 - (a) Its current allocation policy under Section 166A of the Housing Act 1996
 - (b) Its current tenancy strategy under Section 150 of the Localism Act 2011
- 7.6 The Council is required to take its homelessness and rough sleeping strategy into account in the exercise of its functions.
- 7.7 The Council is required to keep its homelessness and rough sleeping strategy under review. Where the Strategy is amended, the Council must consult with stakeholders on the changes.
- 7.8 The Council must take account of the provisions of the Human Rights Act 1998 and not act in a way which is incompatible with a Convention right and must also have regards to the Equality Act 2010, in particular, Section 149 (Public Sector Equality Duty).
- 7.9 The Renters' Rights Bill (formerly referred to as the Renters' Reform Bill) proposes to make changes to legislation that will likely have an impact on homelessness, including the abolishment of Section 21 'no fault' evictions, abolishment of fixed term assured tenancies and assured shorthold tenancies, and changes to and the introduction of, new grounds for eviction. Once the Bill becomes an Act it will require the Strategy to be reviewed and where appropriate amended.

Operational Implications

- 7.10 There are no operational or staff implications as a direct result of the Strategy's implementation. All tasks highlighted in the Strategy are either are or will be completed within existing operations, and through collaborative efforts with other local authorities, public authorities, and statutory and non-statutory organisations.

Financial Implications

- 7.11 The Strategy does not propose any new or additional actions that would impact on existing budgets for homelessness and rough sleeping. The Strategy and Action Plan will be delivered within existing capacity within the General Fund and through the Homelessness Prevention Grant (HPG). From 2023/24 – 2024/25 the Council has been allocated a total of £1,018,615.00 funding, however the Government is yet to confirm future HPG funding allocations.
- 7.12 There are several financial impacts faced by the Council with regards to homelessness in general:
- (a) The cost of homelessness has increased significantly since 2017/18 with the introduction of the new prevention and relief duties within the Homelessness Reduction Act 2017 and a reliance on TA due to a lack of available housing. This continues to rise each year.
 - (b) Annual Discretionary Housing Payments (DHP) funding for England and Wales was fixed at £100 million per year from 2022/23 until the end of 2024/25. This level of funding is lower than in the years from 2013/14 to 2021/22, with the Government at the time citing 'broader economic pressures' when announcing the freeze at reduced 2022/23 levels. Therefore, this funding source is not something that the Council can solely rely on and will need to be used strategically.
 - (c) The temporary accommodation subsidy system is outdated and unfair. Currently, the LHA covers 90% of rent costs, based on 2011 levels for people in receipt of benefits who are living in TA.
 - (d) Private rents in the district have increased around 7% annually 2020 and continue to grow, while LHA rates have seen limited to negligible growth since 2013 and only recently relinked to the 30th percentile level in April 2024.
 - (e) Considering the current financial situation, the Government's decisions on fiscal rules and potential restricted spending may impact on the availability and/or scope of funds.

8. Climate Change and Environmental Implications

- 8.1 No implications or impacts have been identified in the preparation of this report, or as a result of the implementation of the Strategy, to climate change or the environment.

9. Corporate Implications

- 9.1 Comment from the Director of Finance (link to the MTFP): 'Accountancy have been consulted in the writing of this report and have no further comment to add (AC)'
- 9.2 Comment from the Solicitor to the Council: The Principal Lawyer – Litigation & Regulatory has been consulted during the preparation of this report and has no further comments to make.
- 9.3 Comment from the Equalities Officer: 'As noted in paragraph 4.1 the adoption of this Strategy will potentially have a negative impact upon several protected characteristic groups. Proposals to mitigate these impacts are detailed in the Equality Impact Assessment. The Equality Officer has been consulted during the development of this report and has no further comments to make, other than to remind Members that in

discharging their responsibilities they are required to comply with the public sector equality duty as set out in section 149 of the Equality Act 2010.'

10. Appendices

Appendix 1 – Homelessness and Rough Sleeping Strategy 2025-2030

Appendix 2 - Summary of Homelessness and Rough Sleeping Strategy 2025-2030

Appendix 3 – Homelessness and Rough Sleeping Review 2024

Appendix 4 – Equality Impact Assessment

11. Background Papers

DDC Homelessness and Rough Sleeping Strategy 2020-2024

Homelessness Act 2002

Homelessness Code of Guidance for Local Authorities

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