

Thurrock Council

Community Equality Impact Assessment

Service area and lead officer

Name of service	Housing Solutions
Lead officer name	Chris Wade
Lead officer job title	Head of Housing Solutions
Lead officer email address	christopher.wade@thurrock.gov.uk

Subject of this assessment

What specific policy, strategy, function or service is the subject of this assessment?
Proposal to increase levels of Thurrock council-owned temporary accommodation
Borough-wide or location-specific?
<input checked="" type="checkbox"/> Borough-wide <input type="checkbox"/> Location-specific – please state locations below.
Click or tap here to enter text.
Why is this policy, strategy, function or service development or review needed?
<p>The Council has a duty to provide emergency interim or temporary accommodation to various homeless households in line with duties set out in the Housing Act 1996(as amended). This includes interim housing under the s188 duty for any person or households which “may fall within a priority need category in line with the Act” pending enquiries into what other duties may be owed and whilst the Council undertakes to assist them in relieving their homelessness, with longer term temporary accommodation under the “main” re-housing duty in s193 of the Act, and also some shorter term accommodation provision under s190.</p> <p>At present, Thurrock uses a mixture of council-owned properties, nightly let units, and bed and breakfast style accommodation in order to exercise these functions. Non-council units come at significantly greater cost and greater legal risk, especially when referring to bed and breakfast housing, than stock owned and managed by the Authority itself. As such, the Housing service is seeking to expand its property assets in this area so as to provide higher quality and lower cost temporary housing to those to whom we owe a duty to provide it.</p> <p>Such provision also permits us to provide more of our temporary accommodation in-borough rather than out, lessening the community and individual impact of homelessness by reducing isolation from informal and formal support for the households involved and their resident families.</p>

1. Consultation and supporting information

- 1.1. What steps you have taken, or do you plan to take, to consult or engage the whole community or specific groups affected by this development or review? **This is a vital step.**

Steps you have taken, or plan to take, to consult or engage

In terms of impact on external stakeholders, the provision of more temporary accommodation within the borough offers the opportunity for better outcomes and experiences for homeless households. By remaining in Thurrock, households remain closer to support networks, their places of education and work, and other locations which are significant in their lives.

In terms on impact on internal stakeholders, additional resource would be required from both HR and Finance in the form of recruitment support and financial expertise. Additional resource would also be required from the Housing Technical Services Team, the Voids Team and the councils Repairs and Maintenance Contractors to fulfil requirements for property inspections, void management, and void works.

- 1.2. What data or intelligence sources have you used to inform your assessment of the impact?
How have these helped you understand who will be affected by the development or review?

Sources of data or intelligence, and how they have been used

Option	Pros	Cons	Reason why option has been chosen or rejected
<p>1. Increase the HRA stock using RTB receipts and HRA borrowing</p>	<p>Allow the reclassification of existing stock as a furnished let, reducing reliance on expensive private temporary accommodation.</p> <p>Will enable the council to maximise its RTB receipts.</p> <p>Will enable the council to avoid interest penalties.</p> <p>Council owns the properties outright</p>	<p>Dependant on suitable properties becoming available on the housing market.</p> <p>Additional staff required to manage the additional properties.</p> <p>Requires borrowing and therefore requires permission to borrow from DLUHC and HM Treasury</p> <p>Concerns raised by opposition and independent politicians in the past. Local media enquiries.</p>	

<p>2. Increase furnished let stock using properties acquired through Phi leasing scheme</p>	<p>Allow the reclassification of existing stock as a furnished let, reducing reliance on expensive private temporary accommodation.</p> <p>Will enable the council to maximise its RTB receipts.</p> <p>Will enable the council to avoid interest penalties.</p> <p>Does not require borrowing from the PWLB, however, the finance lease will appear on Council's balance sheet as liability.</p> <p>Depending on the lease terms, Council might own the properties at the end of the lease term.</p>	<p>On-going costs in the form of a lease cost back to the third party</p> <p>Additional staff required to manage the additional properties.</p> <p>Market yields have increased cost of capital in last 18 months.</p> <p>Thurrock covenant could be a challenge for investors and could lead to higher risk premium applied to yield requirements.</p> <p>Concerns raised by opposition and independent politicians in the past. Local media enquiries.</p>		
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<p>3. Increase furnished let stock from current HRA properties</p>	<p>Increases furnished let stock reducing reliance on expensive private temporary accommodation.</p> <p>Will enable to council to utilise existing stock</p>	<p>Does not utilise all options available to the council to increase its furnished let housing stock.</p> <p>Short to medium term option, not long term</p> <p>Additional staff required to manage the additional properties</p>	<p>This option has been rejected as it does not utilise all options available to the council to increase its furnished let housing stock</p>
<p>4. Do nothing</p>	<p>Maintains the current approach with no further units being purchase</p>	<p>No opportunity for cost savings</p> <p>Competition from other LAs and scarcity of affordable housing supply drive up the cost-of-service delivery.</p> <p>Repayment of unspent RTB receipts with interest penalties</p>	<p>This option has been rejected as it offers no opportunity for cost savings</p>

2. Community and workforce impact

2.1. What impacts will this development or review have on communities, workforce and the health and wellbeing of local residents?

Communities and groups	Positive	Neutral	Negative	Summary of positive and negative impacts	How will positives be maximised, and negatives minimised or eliminated?
Local communities in general	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	By increasing stock, we will be better able to keep more of our most vulnerable residents and families, who would otherwise be homeless or moved to another area, in-borough, thereby keeping their ties to the community, and informal and formal support therein.	Ensuring stock is targeted to those with greater vulnerabilities and stronger local bonds, but also implementing tenancy and locality support to tie them into community groups and offers of assistance.
Age	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This provision is for cohorts across the protected characteristics, and it must be suitable, safe, and affordable for those people placed within it. This takes into account those characteristics and ties into locally based assistance based on need.	Suitability assessments include demographic and equalities data (where the applicant has agreed to provide this) as standard, and this is used to inform placements and support plans, with work alongside Children's and Adults.
Disability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above	
Gender reassignment	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above	Click or tap here to enter text.
Marriage and civil partnership	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above	Click or tap here to enter text.
Pregnancy and maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above	Click or tap here to enter text.
Race	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above	Click or tap here to enter text.
Religion or belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above	Click or tap here to enter text.
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above	Click or tap here to enter text.
Sexual orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As above	Click or tap here to enter text.

Communities and groups	Positive	Neutral	Negative	Summary of positive and negative impacts	How will positives be maximised, and negatives minimised or eliminated?
Location-specific impact, if any	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Although initial placements can be problematic, given the sometimes chaotic nature of the residents supported with this type of accommodation, with the support of localities and other networks, this is minimised in the medium to longer term and new or strengthened links into the local community are likely to reduce locality based ASB and other issues.	Tenancy management and other support to monitor and ensure engagement and compliance.
Health and wellbeing of residents	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	By maintaining their local links, residents will be better able to continue to engage with health and wellbeing in the area, with better outcomes than if they were to be moved elsewhere.	Suitability assessments to ensure placement in areas where their support is available and best contactable.
Socio-economic outcomes	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Cheaper rental for residents in our TA than other providers, and employment/training based support in place will produce better outcomes in this regard.	Suitability assessments and ongoing monitoring of engagement.
Veterans and serving members of the armed forces	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	This cohort is included in the priority need categories likely to be accessing this provision	As above

3. Monitoring and review

- 3.1. How will you review community and equality impact once the policy, strategy, function or service has been implemented? These actions should be developed using the information gathered in sections 1 and 2 and included in your service area's business plans.

Action	By when	By who
Continue engagement as part of the annual review process to ensure the community and equality impact can be reviewed and considered before any changes are made in the review	On an annual basis	Housing Solutions Team
Review any additional feedback from engagement and update this CEIA accordingly	January 2024	Chris Wade

4. Next steps

- 4.1. The information gathered must be used to inform reports presented to Cabinet or overview and scrutiny committees. This will give members a necessary understanding of the impact their decisions will have on different groups and the whole community.

Summarise the implications and customer impact below. This summary should be added to the committee reports template in the Diversity and Equality Implications section for review and sign-off at the consultation stage of the report preparation cycle.

Summary of implications and customer impact

Legal

Provision of our own managed and maintained stock of temporary accommodation permits the Council to ensure that this type of accommodation is suitable, affordable, and meets all legal health and safety requirements without relying on the bona fides and certification of external and more costly private providers. This reduces the risk of disrepair and other legal claims.

Further, as it is our stock and we are best able to assess its suitability and affordability for clients, it is less likely to be challenged through suitability review and/or court action under the relevant Act, incurring less costs and legal implications in this regard.

In addition, expanding provision of and use of our own stock mitigates against the unlawful use of bed and breakfast accommodation (contrary to the Code of Guidance) for families with children for longer than 6 weeks, which, if breached incurs not only legal implications and the potential for costly judicial review, but also unlimited fines from the Local Government Ombudsman.

Community:

By providing in-borough, higher quality temporary accommodation which is affordable and suitable for our residents in both the shorter and longer terms, we can maintain the links of homeless households with their communities, protect their links with their families and support networks, and engage them in employment and other schemes to improve their lives and their community as a

whole. We are better able to ensure that such provision meets the needs of the individuals who approach us for assistance than we could if relying solely on the private sector, and as such, we would be better placed to provide specifically for those with diverse needs, such as individuals or families who may identify with any of the relevant protected characteristics.

5. Sign off

5.1. This Community Equality Impact Assessment must be authorised by the relevant project sponsor, strategic lead, or assistant director. Officers authorising this assessment are responsible for:

- the accuracy of the information
- making sure actions are undertaken

Name	Role	Date
Jayne Middleton-Albooye	Interim Head of Legal services	3 rd November 2023
Chris Wade	Head of Housing Solutions	18/10/23
Ewelina Sorbjan	Assistant Director - Housing	18/10/23