

BIRMINGHAM CITY COUNCIL

PUBLIC

Report to: **CABINET**

Report of: **Corporate Director Place**

Date of Decision: **6 March 2018**

SUBJECT: **HOMELESSNESS REDUCTION ACT 2017
IMPLEMENTATION PLAN**

Key Decision: **Yes** **Relevant Forward Plan Ref: 004656/2018**

If not in the Forward Plan: **Chief Executive approved** ☐
(please "X" box) **O&S Chair approved** ☐

Relevant Cabinet Member(s) **Cllr Peter Griffiths – Cabinet Member Housing and
Homes**

Relevant O&S Chair: **Cllr Victoria Quinn – Housing and Homes**

Wards affected: **All**

1. Purpose of report:

- 1.1 To provide an overview of the Homelessness Reduction Act
- 1.2 To provide a summary of the key changes needed within the Housing Options Service to comply with the Act from 3 April 2018.
- 1.3 To provide a brief summary of the key work streams within the programme plan

2. Decision(s) recommended:

That Cabinet:

- 2.1. Notes the key requirements of the Homelessness Reduction Act and the key changes needed within the service to enable the Housing Options Service to deliver an effective and legally compliant from 3 April 2018.

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3. Consultation:

The Homelessness Reduction Act is legislative in nature and as such the City Council cannot amend or influence the Act. Feedback to MHCLG was provided on the published Draft Code of Guidance on 5 December 2017 and publication of the final guidance is awaited. The City Council has consulted extensively with key stakeholders on the current programme/ delivery plans and a robust plan is in place to ensure the City Council meets the requirements by 3 April 2018.

3.1 Internal

The current Homelessness Reduction Act programme plan has been developed alongside key internal stakeholders. The current iteration of the implementation plan for Homelessness Reduction Act was developed by a cross-Directorate project board including representatives from Housing, Neighbourhood Advice, Communications, IT Press Office and others. The project implementation plan has been co-developed with input from service representatives. Due to interdependencies, the programme plan has now been merged with the key activities in the Trailblazer Project Plan and the Move On and Temporary Accommodation Plan. The refreshed single programme plan was shared with internal representatives at the Housing Options Transformation Board on Friday 26 January 2018.

The programme plan contains key actions and activity between January and March 2018 focussed on increasing awareness and communicating the requirements of the Act and resultant service changes.

3.2 External

There is a range of external partnership boards that have fed into and receive progress updates on the Homelessness Reduction Act programme. A specific stakeholder group was established to consider the requirements of the Act, its impact upon stakeholders and how they can support the implementation. In addition the Homelessness Reduction Act and its implementation is a standing item on the Homelessness Partnership Board. As the plan is delivered, there are various work streams that involve consulting and working with external providers and stakeholders to support the implementation of the act. Engagement will be an ongoing process as we continue to develop relationships and commissioned provision. This has been factored into the Training and Awareness and Communications work streams within the programme plan.

4. Compliance Issues:

4.1 Are the recommended decisions consistent with the Council's policies, plans and Strategies?

The Homelessness Reduction Act 2017 implementation and delivery model supports the priority themes, as agreed by Cabinet on May 16th 2017 across all four priority areas:

Children – The negative implications of Homelessness upon child health, disruption to their education and development is recognised. The purpose of the Homelessness Reduction Act and its implementation drives the need for ensuring children and families

have sustainable, affordable and suitable homes. The new Homelessness Reduction Act focusses intervention and prevention on vulnerable groups within the community.

Housing – The plan recognises the importance of sustainable, suitable and affordable housing solutions as part of preventing Homelessness and supporting the recovery of people that are Homeless. The plan is focussed on preventing Homelessness and increasing the capacity within the private rented sector.

Jobs and Skills – The plan recognises the clear link between affordability and housing and people's employment aspirations and their housing choices and how this avoids people presenting as Homeless or incidents of repeat Homelessness. The prevention element of the act is heavily focussed on ensuring that we support citizens in a more holistic manner to ensure that both current issues are addressed and any future risk of repeat issues are minimised. A degree of the work we are currently doing around building the new way of working is focussed on supporting people with maximising their income and ensuring they can effectively budget and their homes are affordable.

Health – The plan recognises the health implications of Homelessness during a person's lifetime and also considers the need for housing advice and support tailored to vulnerable groups such as adults with disabilities and people with mobility issues.

4.2 Financial Implications

(How will decisions be carried out within existing finances and Resources?)

The City Council has been awarded £1.76m funding from the New Burdens Fund over three years, together with a small one-off allocation of £9,000 for additional IT provision. Whilst detailed additional costs will become clearer once formal guidance is published, a number of additional costs have been identified as follows:

- Additional resources to implement and operationalise the new requirements (including temporary additional staffing) - £1.2m
- New IT provision - £0.009m
- Training and Communication - £0.007m
- Additional Commissioning - £0.550m

The new burdens funding is not an ongoing resource and as such it will be necessary to ensure that deliver sustainable solutions are developed that can be delivered and maintained within overall approved Housing Options Service budgets in future years.

Additional Funding:	Allocation 2017/18	Allocation 2018/19	Allocation 2019/20	Allocation 2020/21	Total allocation
New Burdens:	£548,633	£502,547	£714,987	£-	£1,766,167
IT provision	£9,000	£-	£-	£-	£9,000
Total	£557,633	£502,547	£714,987	£-	£1,775,167

	Spend 2017/18	Spend 2018/19	Spend 2019/20	Spend 2020/21	Total Spend
Planned Expenditure	£138,510	£1,054,946	£166,338	£16,440	£1,376,234

It should be noted that it is likely that additional implementation costs will be identified once formal guidance is issued, and that these additional costs, together with any differences in phasing between the New Burdens Funding and planned expenditure will be managed as a part of the overall approved Housing Options Service Budgets for 2018/19 and future years.

4.3 Legal Implications

4.3.1 This report sets out the new duties and requirements of the Homelessness Reduction Act 2017 and the City Council's plans to enact these duties. The details are set out in section 3 of the report.

4.3.2 The Homelessness Reduction Act is the largest change in the statutory approach to Homelessness since the 1977 Housing Act, and will commence in April 2018. There are numerous additional duties placed upon Local Authorities under the Act with an increased focus on identifying those at risk of Homelessness as early as possible and maximising the opportunities for preventing their Homelessness. It is intended that these new duties to prevent Homelessness will result in savings for Local Authorities in the longer term and reduce the levels of Homelessness across the country.

4.3.3 The key requirements of the Act include:

- **s.179 amends the existing duty to provide advisory services** - Acting as an advisory service, the LA must:
 - Provide or secure the provision of advisory services, free of charge.
 - Information and advice on preventing Homelessness, securing accommodation, rights and duties under Part 7 Housing Act 1996.
 - What help is available and how to access it.

"Early application for Homelessness assistance maximise the time and opportunities available to prevent Homelessness. Information provided through websites and other channels should therefore a) help enable people to take action themselves where possible and b) actively encourage them to seek assistance from the authority in good time if they need it" as per Draft Code of Guidance para 3.3.

This duty may be contracted out, funded or provided in partnership with other organisations under s179 (3) and Draft Code of Guidance para 3.7.

- **S.189A introduces a duty to assess every eligible applicant and agree a plan.** The assessment duty means that all customers who are Homelessness or threatened with Homelessness and are eligible for assistance then the authority must assess the housing needs and consider what support it can provide to ensure that the applicant has or retains suitable accommodation regardless of priority need status and be notified of the assessment in writing. As part of this assessment, a Personal Housing Plan (PHP)) should be prepared with the customer, which has to be reviewed and kept up-to-date. Applicants can submit reviews/ appeals around their PHPs.

- **S.175 extends the definition of “threatened with Homelessness”.**
If it is likely that they will become Homelessness within 56 days or if a valid Section 21 Notice has been given in respect of the only accommodation the person has and the notice will expire in 56 days. In theory at least, provide the LHA with more time to prevent actual Homelessness from occurring.
- **S.195 amends existing duty in case of threatened with Homelessness and sets out the prevention and relief duty.**
- Duty is to take reasonable steps to help the applicant to secure that accommodation does not cease to be available.
- Duty applies if the LHA is satisfied that the applicant is threatened with Homelessness and eligible for assistance.
- LHA must have regard to section 189A assessment when deciding what steps to take.

This is not a duty to provide accommodation but help the applicant to help themselves. This is what both the LHA and the applicant can do to keep the accommodation they are currently in.

The Act extends the prevention duty to 56 days, which places a duty on the LA to carry out more prevention work. The Relief duty (Homelessness application) arises where the LA is satisfied that the applicant is Homelessness and eligible, and the LA should take reasonable steps to help the applicant secure accommodation with a ‘reasonable prospect’ of lasting for at least 6 months. The new Act contains significant provisions around non-cooperation of the PHP and refusal of offers of accommodation which enable the local authority to give warnings and service notices to applicants ending their duty to assist; however they still have a right to request a review of this decision.

- **s193 (2 part b) Extends the final offer to end Homelessness to include a 6 month assured shorthold tenancy.** Where an applicant is unintentionally Homelessness, eligible for assistance and has a priority need for accommodation, the Council has a duty under section 193(2) to secure that accommodation is available for their occupation. This is commonly known as ‘the main housing duty. The main duty can be ended with a ‘Final Offer’ and the Final Offer will include either an offer of Council Accommodation or an offer of a 6 month Assured shorthold tenancy. This tenancy may be in the Private Rented Sector. Advice from the Ministry of Housing Communities and Local Government provides a legal duty for this approach:
 - In 2011, Government changed the law so that councils can house families in decent and affordable private rented homes. This means Homelessness households should not have to wait as long for settled accommodation, spending less time in temporary accommodation
 - The Homelessness Reduction Act puts prevention and relief of Homelessness through an offer of suitable private rented accommodation onto a statutory footing. Either duty can be brought to an end through an offer of suitable PRS accommodation let on an assured shorthold tenancy of at least 6 months duration.

- The Homelessness (Suitability of Accommodation) (England) Order 2012 sets out the requirements on suitability of privately rented accommodation offered to Homelessness households. The Homelessness Reduction Act extended the scope of these regulations to cover properties offered to applicants who have priority need to prevent or relieve their Homelessness.
- Applicants have the right to request a review on the suitability of an offer of accommodation made to prevent or relieve Homelessness, or to bring to an end the main Homelessness duty.
- Legislation and the Code of Guidance provide safeguards to ensure suitable properties are offered, and that applicants needs and circumstances are taking into account

4.4 Public Sector Equality Duty

An Equality analysis has been completed. See appendix 1 .There is no significant detrimental impact on any characteristics or groups.

5 Relevant background/chronology of key events:

- 5.1 The Homelessness Reduction Bill received Royal Assent on 27 April 2017. It will come into force on 3 April 2018 and will place new legal duties on English councils so that everyone who is Homelessness or at risk of Homelessness will have access to meaningful help, irrespective of their priority need status, as long as they are eligible for assistance. This has broadened the citizen groups who are owed a duty and also introduced a legal duty to provide advice and carry out prevention work to support citizens to remain in their current homes.
- 5.2 Part VII of the Housing Act 1996, as amended by the Homelessness Act 2002, set out the duties owed by English local housing authorities (LAs) to someone who is Homelessness or threatened with Homelessness and defined that a person is threatened with Homelessness if it is likely that they will become Homelessness within 28 days. The new Act extends the number of days from 28 to 56 to provide more time to carry out prevention and relief work. In addition, people who have received a valid notice under section 21 of the Housing Act 1988 and the expiry date is within 56 days, will be treated as being threatened with Homelessness
- 5.3 The key requirements of the Act include:
 - Acting as an advisory service, the local authority must provide information and advice to a range of people with varying levels of need, on preventing Homelessness and/or securing accommodation, making a Homelessness application and how to access available help. This will require changes to our current customer contact centre and a review of information held in offices and on the city councils website. This can be contracted out to other agencies on behalf of the Council.
 - A new referral duty means that public authorities may make a referral to the local authority where they consider a person to be Homelessness or threatened with Homelessness. This referral should be incorporated into local authority Homelessness

strategies and referral procedures should be set up with local agencies. This duty comes into effect from October 2018 and our plans need to ensure that the consultation and engagement work is carried out with partners in sufficient time for its launch.

- The assessment duty means that all customers who are Homelessness or threatened with Homelessness and are eligible for assistance, will be offered an assessment of their housing circumstances, regardless of priority need status, and be notified of the assessment in writing. This initial assessment should be face-to-face where possible and will be focussed on understanding the underlying or real issues that have created the housing/ Homelessness need. By understanding the real issues to solve, we will be better able to design personalised solutions to their problem that are both effective and sustainable. Through identifying the common issues that exist, we will be able to design services that will mean we can start to support people much earlier in the process and in turn prevent them from needing housing or Homelessness help in the first place.
- As part of the housing needs assessment, a Personal Housing Plan will be prepared with the customer which is bespoke and personalised to the customer's individual circumstances and addressing the real issues to solve. The plan will set out steps that both the customer and the officer will take to retain or secure suitable accommodation and should be written and given to the applicant. This plan will be drawn up with the customer and actions and solutions will be suggested by them. This is a significant change from the current approach which prioritises the Homelessness duty and is very transactional in nature and led by the officers. Previously, the prevention opportunities available to us were limited and most solutions suggested to the customer were fixed and inflexible. As we switch to the new model, solutions will be developed by the customer and will need to be much more flexible and responsive to their needs.
- The Personal Housing Plans should be reviewed and kept up-to-date, and applicants can submit reviews/ appeals around their Personal Housing Plans.
- The remit of 'threatened Homelessness' has expanded under the Act, whereby a person is now threatened with Homelessness if it is likely that they will become Homelessness within 56 days. The local authority then has a duty to take reasonable steps to prevent the Homelessness by helping the applicant to remain in their accommodation or secure alternative accommodation. The LHA doesn't have a duty to provide accommodation but to assist the applicant to help themselves. Written notice must be given if the local authority is satisfied that the prevention duty has ended i.e. because they have secured accommodation.
- The Relief duty (Homelessness application) arises where the local authority is satisfied that the applicant is Homelessness and eligible, and the local authority should take reasonable steps to help the applicant secure accommodation with a 'reasonable prospect' of lasting for at least 6 months. The new act legislates that the city council can discharge their relief duty by securing a 6 month assured short hold tenancy within the Private Rented Sector. Whilst we will be able to discharge our duty to the private rented sector in this way, we will need to ensure that this is not just a short term solution and that there is a plan for this tenancy to be sustained beyond 6 months or that we continue to work with the customer to secure a more permanent solution. If this is not done, there will be repeat presentations every 6 months.
- The Relief duty can be ended due to 'deliberate and unreasonable refusal to cooperate' by the applicant. The Act contains significant provisions around non-cooperation and refusal of offers of accommodation which enable the local authority to give warnings and service notices to applicants ending their duty to assist.

- Failure to co-operate by an applicant for assistance – This provision will place a requirement on all applicants to cooperate with local authorities' attempts to comply with their prevention and/or relief duties. If a local authority considers that an applicant has 'deliberately and unreasonably refused' to cooperate or take any of the steps set out in the personalised plan, they can serve a notice on the applicant to notify them of their decision as long as the notice explains, what the consequences of the decision are and that they have a right to request a review of the decision.
- Final Accommodation Offer – One of the prescribed conditions is the ending of the duty if a final accommodation offer or final part 6 offer is accepted or refused.
 - A final accommodation offer is of an assured short hold tenancy of at least 6 months term made by a private landlord.
 - A final Part 6 offer is an offer of accommodation under Part 6 (Allocation of Housing).

5.4 Implications identified around Homelessness Reduction Act:

- 5.4.1 The key requirements of the Act listed above will have direct implications for the Housing Options Centre and the way that it currently operates/ deals with customers. The assessment duty and Personal Housing Plans in particular are central to the new Homelessness Reduction Act functions, and will require a significant shift, both practically and culturally, for staff in Housing Options.
- 5.4.2 The work in Housing Options has identified a number of challenges, issues and changes that are needed to ensure the service is fit for purpose both currently and from April 2018 when the Homelessness Reduction Act comes into effect:
1. The day to day work and operations in Housing Options has to change from a transactional service, to case management and coordination of support. This will require a change to the job descriptions and person specifications for the team
 2. Demand within Housing Options is likely to increase as the timescales for support and the cohort who can approach is expanded under the Act, although at this stage it is not possible to identify whether this will be an ongoing increase or merely a temporary impact
 3. There are additional data and IT burdens for the service as the requirement for more personalised advice and interventions is introduced
 4. Good quality and effective support will be needed to support the Personal Housing Plan delivery and to carry out effective prevention work
 5. Improve the customer journey
- 5.4.3 Finally, the current processes and in turn IT systems will not allow for full delivery against the new Homelessness Reduction Act requirements from April 2018, and whilst some work on this is currently underway it is likely that some aspects of service delivery will be reliant on short term interim solutions.
- 5.4.4 Demand for the service over the last two years has been analysed to provide a basis for future profiling.

5.4.5 The Housing Options Centre had some high level data that also allowed us to estimate what current unmet need may look like when applied under the new Act requirements. These numbers were then uplifted by a further 50% to allow for higher than expected demand increases, consisting of the 30% national estimate and the unmet need identified during the review of the Housing Options Centre. This will provide more capacity for the period of transition, training, development and embedding the act as new ways of working are implemented.

- The current demand for pre-booked appointments and the unmet need (measured from emails) is on average 200 cases per week. As above, a 50% uplift is assumed, to allow for around 300 new housing options cases per week.
- The service on average takes between 90 and 110 Homelessness applications per week and it is unclear how this will be affected by the legislation. During early implementation the numbers are likely to increase slightly due to increased awareness of the housing options service but within the medium term the successful prevention work should start to reduce this demand. Current projections are based on the figure remaining at the higher end of the range.

5.5 Risks and Issues identified around Homelessness Reduction Act

5.5.1 The key requirements of the Act listed above will have direct implications for the Housing Options Service and the wider City Council and the way that it currently operates/ deals with customers. The assessment duty and Personal Housing Plans in particular are central to the new Homelessness Reduction Act functions, and will require a significant shift, both practically and culturally, for staff and customers.

5.5.2 The preparation work for the Act has identified a number of specific challenges, issues and changes that are needed to ensure the service is fit for purpose both currently and from April 2018 when the Homelessness Reduction Act comes into effect:

1. Demand is likely to increase as the timescales for support and the cohort who can approach is expanded under the Act. We analysed the number of cases in the service and estimated up to a 50% increase to allow for higher than expected increases. This consists of the 30% national estimate and the unmet need identified during the review of the current service. This provides more capacity for the period of transition, training, development and embedding the act/ new ways of working.
2. We currently encourage customers to consider and seek alternative accommodation within the private rented sector due to council stock not meeting demand. If we do not discharge any of our duties within the private rented sector, there will be a significant increase in all temporary accommodation use but in particular in the use of B&B and out of city placements. Southwark who piloted the new Act from 2016 saw an increase of 15% in their temporary accommodation use. This was alongside them discharging their duties to the private rented sector. These estimates would see us increase our current volumes of TA from c2100 to 2450. We are exploring various incentives with private landlords to ensure we attract long term, affordable decent homes, for example through awarding contracts for the leasing of homes from private sector landlords.

3. To meet the expected increase in demand there will need to be an increase in staffing within Housing Options. Recruitment is due to start in February but it is likely that the 20 additional FTE posts will not be filled by 3 April 2018. Furthermore, the current training and development plan is challenging and the new intake of staff will need to take part in this process.
4. The new burdens funding is time limited and as such has to be used to deliver sustainable solutions that can be delivered through mainstream funding in future years. The key risk is that the desired outcomes of the act do not deliver effective prevention and reductions in future years demand. It is not known yet whether the needs of service (as a result of the act) will exceed the additional funding available.
5. There are additional data and IT burdens for the service. Current IT solutions are not fit for purpose and the service requires a new case management system to support the switch to the new way of working. We are currently working with Capita-ICTDS to procure and implement a new module to support the work but this is unlikely to be live and ready for 3 April. An interim solution will be needed and is being developed.
6. Good quality and timely support from other services and providers will be needed to help people deliver against the actions in their Personal Housing Plan. Some of the current provision will need to be changed and new services may need to be sought. We are currently collecting data and information from our pilot work at the Housing Options Centre to identify what this needs to be.
7. The Allocations Policy will need reviewing in line with the Homelessness Reduction Act and is likely to involve consultation on the changes. It is not yet known what level of changes will be required and whether there will be additional operational costs.
8. There is a corporate review underway into all Advice Services across the city council. This will have an impact/ influence on the Advice Duty but the findings of the review will not be ready by the time the Act is launched. To mitigate this risk we have a work stream focused on identifying the short and medium term strategy.
9. There is a need for additional housing capacity to cope with current demand and the anticipated increase through the Homelessness Reduction Act. We need to continue to develop the private rented sector market and to develop a robust social letting agency(s). We are looking at a range of incentives to encourage the PRS sector to provide houses to the housing options service.

5.6 The Housing Options Programme Plan

- 5.6.1 To ensure legal compliance by 3 April 2018 and address the issues and risks identified above there is a comprehensive programme plan in place and being delivered. This plan consists of seven key projects which are summarised below: See appendix 2

5.6.2 Housing Options Interim Design – Pilot

This project is focussed on ensuring that we meet the minimum legal requirements from 3 April 2018. It is focussed on ensuring the processes, procedures and practices at the Housing Options Centre are fit for purpose and support the customer in meeting their needs. This work has designed the personal housing plan, ensured the customer deals with a single worker and is starting to help us understand what support we need from other services and providers to deliver solutions for customers.

5.6.3 Housing Options whole system redesign – post April 2018

This stream is focussed on learning from and extending the current pilot to consider how the wider housing options division (housing applications, allocations, reviews and Temporary Accommodation) needs to change to deliver effective services to the customer and meet the Act requirements in full. This phase is focussed on starting to develop and commission new service provision and to ensure all internal support services (including benefits, Neighbourhood Advice, adult social care etc.) work effectively with us to deliver outcomes. In addition, this work stream involves actions to develop the private rented sector market and embed the Private Rented Sector discharge duty that is introduced with the new Act. Our current city council and Registered Social Landlord stock is not sufficient to meet demand and we need to source and develop more accommodation options. The current advice provision is being reviewed to ensure it meets the needs of the Act and our customers.

5.6.4 Awareness and Training

The plan sets out the awareness and training needs and content for a range of different groups from in depth training for Housing Options staff to an introduction of the act and its impact to customers. This will also include briefing and training sessions for Members. The plan includes intensive in the work training for the staff at the Housing Options Centre and will be delivered by the staff on the pilot who have been designing the new way of working and have been delivering the new service. The Service has already completed around 50 new cases in line with the new legislation as a pilot and the experience of these staff will be used to ensure all officers are ready by 3 April.

5.6.5 IT

The IT programme is focussed on ensuring that we have the right equipment and software in place to support the new way of working. It is focussed on ensuring we have a flexible and responsive workforce that has the tools and solutions it needs to meet the new government data requirements and ensures that the officers can spend the maximum amount of time supporting the customers and not administering an IT system or paperwork. This work stream requires the support of the city councils IT provider.

5.6.6 Accommodation

To ensure we have the right space and environment to support the expected increase in presentations and the associated staffing increases, we will be looking to remodel accommodation to better meet the future needs of the Service. This part of the programme is looking at the options available to us and how we mobilise these by 3 April. Sections of this project plan look at both the short term quick fixes and the longer term plan.

5.6.7 Communication

The communication plan sets out how we are going to communicate the new act and its requirements with a range of different audiences including customers, internal staff, members, partners and agencies. The plan sets out how we are going to design the

communications, the content and delivery mechanisms. These plans will be designed with support from the intended audiences and will need the help and guidance of the city councils communications team.

5.6.8 Temporary Accommodation

This project plan is focussed on developing our current provision of and approach to use of Temporary Accommodation. The activity looks to increase our own provision of Temporary Accommodation and to minimise the use of Bed and Breakfast, particularly for families. One of the first key actions will be to carry out an in depth and comprehensive review of the Temporary Accommodation service to inform future development plans.

6. Evaluation of alternative option(s):

- 6.1 The Homelessness Reduction Act is new legislation so we have no alternative option but implement the requirements of the Act and comply with the formal Guidance (when issued), including the relief duty to discharge in the private renter sector. The programme plan and new service design covered in the report has been developed through redesigning the current service through a team of housing officers who work with the customers every day. The pilot has been operating for around 4 weeks and based upon this learning and from early adopters of the legislation, Southwark Council and discussions with specialist advisors, partners and the Ministry of Housing Communities and Local Government we have developed the robust programme plan. Much of the activity in the plan looks at a range of options including communications, training, IT, accommodation and Temporary Accommodation options.

7. Reasons for Decision(s):

- 7.1 This report is a summary of the new requirements under the Homelessness Reduction Act, our response and key risks and issues. This report recommends that Cabinet support the implementation of the new requirements under the Act

Signatures

Date

Cllr Peter Griffiths
Cabinet Member for Housing
and Homes

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Jacqui Kennedy
Corporate Director for Place

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List of Background Documents used to compile this Report:

1.

List of Appendices accompanying this Report (if any)

1. Equality analysis
2. Summary of project plan