

Oldham Council Temporary Accommodation Strategy

2021-24

1.0 Introduction

- 1.1 In accordance with the Housing Act 1996, Oldham Council has a legal duty to offer interim accommodation to certain households seeking housing assistance. The introduction of the Homelessness Reduction Act (HRA) 2017 which amended the Housing Act 1996, placed additional duties on Local Authorities (LA) to provide housing assistance and intervention at an earlier stage, including the offer of interim accommodation (also known as temporary accommodation)
- 1.2 Amongst a raft of other measures, the HRA which came into force in April 2018 introduced the Prevention and Relief Duties. The Prevention Duty applies to households that are threatened with homelessness within 56 days. Under the Prevention Duty, the Authority are obligated to take reasonable steps to prevent a household from becoming homeless, this may involve, negotiating for the household to remain in their existing accommodation or sourcing alternative accommodation for them.
- 1.3 Unlike the Prevention Duty, the Relief Duty is awarded when a household that is assessed under housing legislation as vulnerable becomes homeless. It is at that point that a LA is obligated to provide temporary accommodation.
- 1.4 In order to meet any interim accommodation duties owed to a homeless applicant, the Council would provide temporary accommodation via one of the following options:
 - Emergency Bed & Breakfast (B&B) Placement
 - Nightly paid annexes and self-contained dwellings
 - Dispersed Council managed accommodation
 - Refuge Accommodation
- 1.5 In addition to providing TA to eligible households owed the Relief Duty, Oldham Council must meet strict suitability standards in accordance with the

Homelessness (Suitability of Accommodation) (England) Order 2012 and the Homelessness Code of Guidance.

- 1.6 Besides the suitability criterion, the Council must also consider factors that influence the provision of temporary accommodation, not least the cost to Oldham Council of providing temporary accommodation that is not in a B&B setting.
- 1.7 The key priority for this document is to enable Oldham Council to continue meeting its statutory obligation to provide TA, but to ensure this is done in a cost-effective and sustainable manner.
- 1.8 The Council has a series of planned activities dedicated to maximising existing resources in the borough such as, working closely with partners namely, Registered Social Landlords and Private Landlords and continuing to offer bespoke housing related support to each household to ensure their housing needs are met during and beyond their TA placement. Ultimately, this approach will contribute to better tenancy sustainment and subsequently reduce repeat homelessness.

2.0 Local Context

2.1 Oldham's Challenges

- 2.3 Oldham is one of ten boroughs located in Greater Manchester that forms part of the devolved Greater Manchester Combined Authority (GMCA). Since the introduction of the HRA, Oldham has seen a gradual increase in homelessness presentation which has subsequently resulted in an increase of admittances into TA, the highest percentage increase in GMCA during that period.

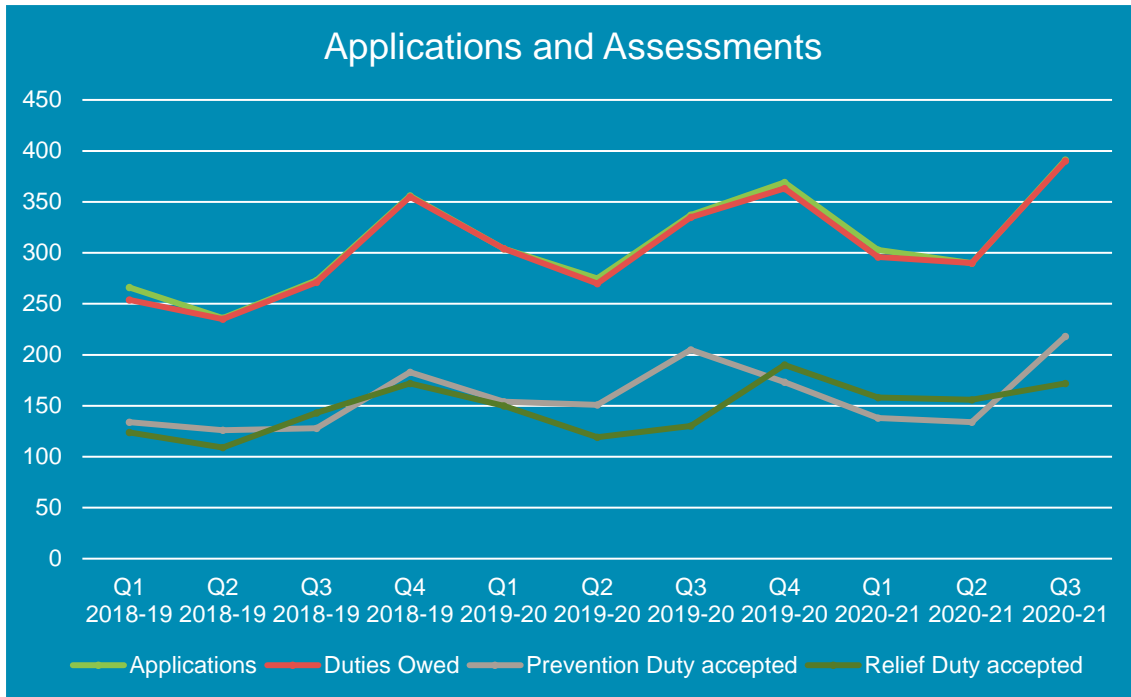


Fig 1

2.4 The chart shown in Fig 1 clearly outlines the challenges caused by the rise in homelessness in Oldham. Unsurprisingly this trend is mirrored nationally, and this document sets out how the Council plans to sustainably address the growing demand for TA.

2.5 Between 2019-20 and 2020-21 the number of households placed in temporary accommodation increased by 11%. The impact of the COVID-19 pandemic undoubtedly contributed to this increase, to what extent, is still unclear.

2.6 Homelessness and TA admittance were already trending upwards following the introduction of the HRA. The COVID-19 pandemic together with accompanying Central Government directive only compounded pressure on the Council to provide interim accommodation to a growing number of homeless households.

2.7 Number of Households in Temporary Accommodation

2.8 The impact of the HRA has been significant in respect to temporary accommodation admittance and since the Councils' statutory Housing Advice came back in-house, Oldham has seen a gradual and consistent increase in the number of households in TA.

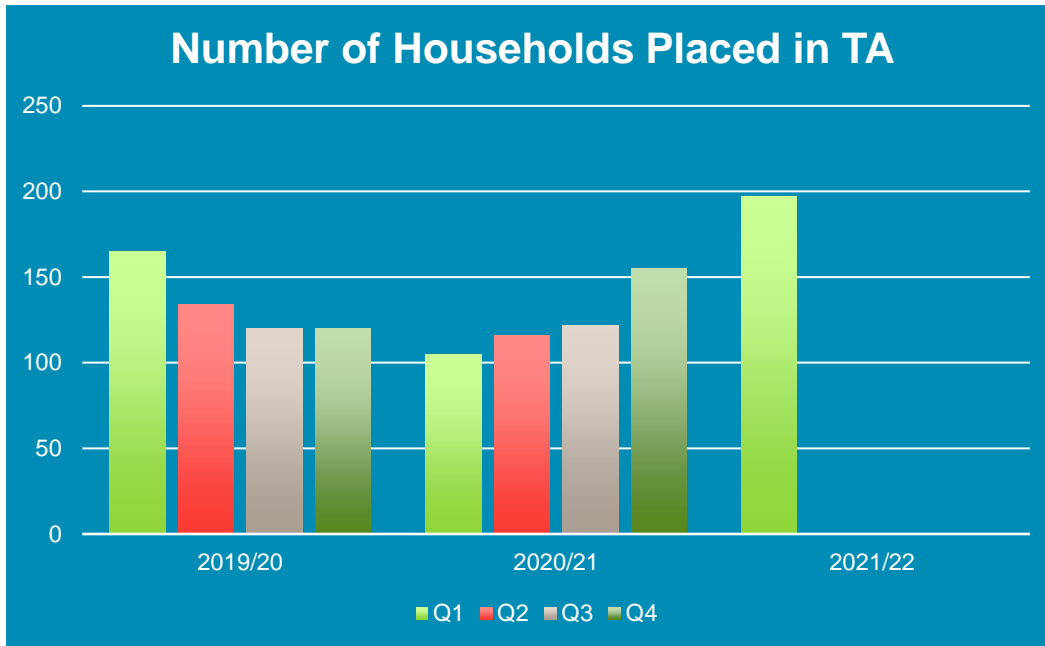


Fig 2

2.9 Based on the current trend illustrated in Fig 2 it's difficult to predict when this figure will plateau, so the priority of this strategy is to ensure that the Council is equipped to effectively meet the growing demand, through development of a robust and sustainable TA portfolio and procurement approach.

2.10 Domestic Abuse Act 2021

2.11 The introduction of the Domestic Abuse Act 2021 brings forth significant changes and placed additional duties on the LA not least, the requirement to award the priority need criterion to any domestic abuse (DA) victim and to proceed to offer safe accommodation. A thorough and extensive definition has been provided together with supplementary guidance notes and factsheets. However, the Act discourages the use of B&B accommodation for DA victims even on an emergency basis. Given the high demand for TA and limited supply of suitable and affordable self-contained options, the Council must work collaboratively to ensure it doesn't fall short of its statutory functions.

2.12 Private Rented Sector Evictions

2.13 The impact of the COVID-19 pandemic had a lasting influence on how homeless services are delivered and how LAs applied the legislation. Most notably, the announcement of 'Everyone In' directive saw Central Government calling for Authorities to accommodate anybody found to be rough sleeping or at risk of rough sleeping. The pandemic also put a halt on Bailiff Evictions which resulted in a 60% reduction on homeless presentations from the private rented sector (PRS).

- 2.14 It is anticipated that homelessness presentations from the PRS will revert to pre-pandemic levels as the courts work through the backlog of cases. Though figures are still unclear, it's anticipated that significant homeless presentations from the PRS are expected through this financial year.
- 2.15 Notwithstanding forthcoming challenges, the Temporary Accommodation Strategy will support the Homelessness Prevention and Reduction Strategy to ensure Oldham is well positioned to deal with the fallout from the pandemic and the route to recovery.

3.0 Where Homelessness Households are Placed

3.1 Temporary Accommodation Variety

- 3.2 The current blend of TA in Oldham is varied and flexible, allowing the Council to spread the risk across several provisions.

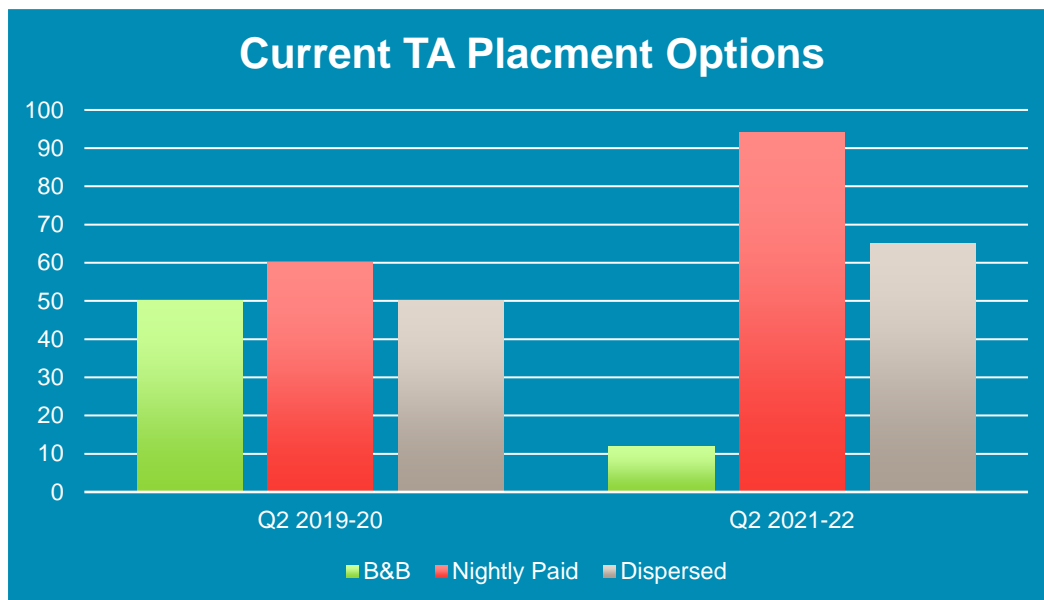


Fig 3

- 3.3 On-going efforts to reduce the number of households accommodated in B&B have resulted in a significant a reduction of B&B placements. As a result of making a substantial shift away from B&B placement, the risk of non-compliant B&B has subsequently reduced. Local Authorities that accommodate family households in B&B longer than six weeks face special measures from Ministry of Housing, Communities and Local Government (MHCLG) – Oldham Council recorded zero non-compliant cases in 2020/21.

4.0 Strategic Objectives for Oldham's Temporary Accommodation

4.1 Key Priorities

- 4.2 A key priority of this strategy is overseeing a gradual and organic transition from nightly paid to more cost-effective methods of delivering TA, representing a planned step-down approach.
- 4.3 The table in Fig 3 illustrates the gradual move away from B&B over the previous two years. Consequently, the shift from high B&B usage was driven by the Council bringing online additional nightly paid units that are considerably cheaper than B&B, but crucially, allows the Council to meet its statutory requirements. Not least, ensuring family households were not placed in B&B for longer than 6 weeks as legislated in The Homelessness (Suitability of Accommodation) (England) Order 2003 due to the long-term impact on the family's health and wellbeing, especially the children.
- 4.4 Successful delivery of the strategy would enable the Council to make a significant improvement to the lives of Oldham residents, by providing better housing and support to improve people's lives– a key priority that was highlighted in the Council's Housing Strategy 2019.

5.0 Temporary Accommodation Delivery Methods

5.1 Sustainable Option

A range of delivery methods have been identified as part of gap and benchmark analysis. All the options outlined below support the development of a cost-effective and sustainable portfolio.

5.2 Leased/Council Managed Provision

- 5.3 During the lifespan of this strategy the Council intends to bring online more lease accommodation that the Council will manage. The properties will be in dispersed locations across the borough to cater to the growing demand boroughwide. Leased provision has proven to be suitable for homeless households, cost-effective for the Authority and more sustainable overall.
- 5.4 Housing Benefit (HB) subsidy claims from Government is also a notable justification for why additional lease provision is desirable. Compared to nightly paid accommodation, leased provision is an estimated 54% cheaper than nightly paid due to the funding gap between payments made to the provider and subsidy claims (income) from Central Government.

5.5 How will we Grow the Leased Portfolio

- 5.6 We understand the PRS plays a significant role in driving up housing supply across all tenures, including TA. Currently, 32% of the Council's dispersed leases are from private landlords, the other 68% are from social landlords.
- 5.7 As a co-operative borough Oldham is committed to collaboration and co-delivery. We continue to apply this ethos in our approach by growing our portfolio through public and private sector partnerships. We will seek more opportunities to work with Registered Social Landlords (RSL) and private rented sector (PRS) landlords to increase the supply of good quality single and family accommodation for TA use
- 5.8 In delivering this Strategy we'll undertake further market research to identify a range of lease options, such as income-strip lease arrangement, known to rapidly boost housing supply from the private sector. We'll commit to exploring available options on the market to understand if/how they can support the Council's TA growth.
- 5.9 Specified Exempt Accommodation – Temporary Accommodation with Support
- 5.10 Temporary Accommodation with support, otherwise known as 'Supported Accommodation' or 'Specified Exempt Accommodation' is an option Oldham has been exploring for several months. Supported Accommodation is defined as accommodation that is provided by a non-profit organisation for vulnerable individuals, where normal HB rules do not apply.
- 5.11 The majority of Single people who enter TA suffer from either, or a combination of, physical and mental health illness. In most cases their identified need or dependency means they will require additional support to sustain in TA and when they subsequently move on to live independently.
- 5.12 As shown in Fig 4 the type of support needs tenants require whilst in TA is varied hence, it is critical for the Council to ensure its TA delivery model meets the needs and requirements of the most vulnerable households.

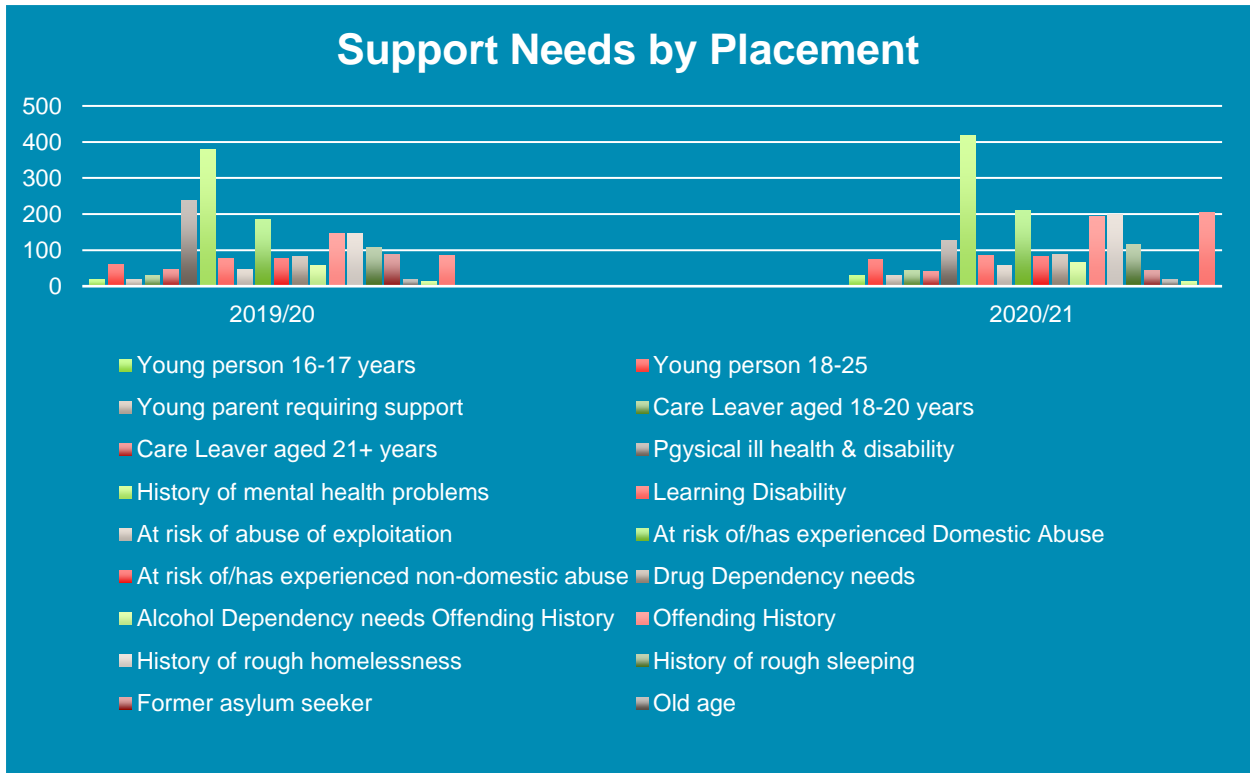


Fig 4

- 5.13 To ensure that we are catering to the needs of our most vulnerable residents, work is underway to bring forward a TA with support model. This type of provision comes with enhanced housing related support and is a step up from general TA in terms of the level of support on offer to individuals. Crucially, this option is considerably more cost-effective, sustainable and suitable than nightly paid provision and hotel/B&B. Consequently, it also forms an intricate part of the overall aims and objectives of the Strategy.
- 5.14 The Authority plans to undertake a procurement exercise to identify reputable partners to collaborate with, to incorporate this delivery model into its portfolio in pursuit of long-term sustainable delivery.
- 5.15 Council Owned Provision
- 5.16 In line with the step-down approach for TA this option is viewed as the final step in strategically growing the Council’s TA portfolio. The Council owned delivery represents the ambitious approach of this strategy. The aim of the TA Strategy is to build the foundations to support a diverse, cost-effective and sustainable TA portfolio which benefits from lessons learned and strives for creativity and innovation.
- 5.17 We will collaborate with colleagues to identify strategic Council assets suitable for TA. In addition, we will work with Homes England and MHCLG to secure external grant funding to make projects and schemes more viable and deliverable.

5.18 Utilisation of existing Council owned assets that can be repurposed or reclassified to deliver TA is widely regarded as one of the best methods of delivery due to a myriad of benefits such as:

- Revenue from HB subsidy/rent
- Regeneration of obsolete assets
- Meeting Statutory obligation

5.19 Housing Strategy will prioritise this approach by working cooperatively with internal colleagues to redevelop existing sites for TA use.

5.20 Move-On Focus

5.21 The Authority is obligated to support individuals in TA with relevant actions that will contribute to resolving their homelessness problem. As detailed in the above graphic, the Authority's TA provides shelter for a number of extremely vulnerable households. The support they receive from the Council is paramount to their health, safety and wellbeing. It's vitally important that every effort is made to build upon this support offer to ensure the chance of repeat homelessness is significantly reduced.

5.22 We will work co-operatively with internal and external partners to increase capacity and dedicated resources to support vulnerable individuals that enter TA. The objective is to ensure the relevant level of housing related support is provided to individuals that cannot sustain without it.

6.0 Service Delivery

6.1 Operational Priorities

6.2 There are several aspects to delivering efficient TA that the Council will commit to developing during the lifetime of this strategy to ensure continued improvement to service delivery

6.3 Procurement of a Provider Framework

6.4 Housing Strategy will undertake a procurement exercise to create a framework of TA providers which the Council would be able to call-off. The framework would grant the Council much needed flexibility to mobilise its strategic objectives for TA, including housing management, competitive pricing, and the ability to develop and build upon existing relationships with local providers.

6.5 Service Charge Policy

- 6.6 As well as fulfilling the Council's statutory obligation to accommodate homeless households on an interim basis, additional steps are taken to support clients during their time in TA by imparting basic housing and tenancy management skills to prepare households for independent living.
- 6.7 It is in the Council's interest to equip homeless households with the requisite skills to manage their own tenancies including, paying bills, budgeting and managing basic housing affairs. It's for this reason that we will commit to extensively rolling out our service charge pilots across the majority of our TA provision. The details of Oldham Council's service charging pilot can be found in the Service Charge Policy.

7.0 The Oldham Plan

7.1 Corporate Priorities

- 7.2 The TA Strategy underpins the Council's co-operative ethos and overarching three-pronged model, dedicated to improving lives and services in Oldham in partnership with key stakeholders.

Inclusive Economy	<ul style="list-style-type: none"> • Commitment to delivering high standards of TA • Create local opportunities by working with local partners and providers • Continue to identify and secure external funding to help deliver on the strategic priorities • Greater utilisation of Get Oldham Working to reduce the likelihood of repeat homelessness • Taking advantage of a procured TA framework of providers
Co-operative Service	<ul style="list-style-type: none"> • Continue to work with key partners and stakeholders to ensure we support our most vulnerable residents • Continue promoting the Housing and Health agenda by working with organisations who are committed to improving the lives of vulnerable homeless residents in Oldham • Work with reputable providers in delivering TA dwellings and safeguarding vulnerable individuals • Prioritise early intervention in all cases, working cooperatively for benefit of households experiencing homelessness
Thriving Communities	<ul style="list-style-type: none"> • Prioritise successful move on-on and sustainment from TA by drawing up effective move-on plans for homeless households. With a focusing on capturing and resolving issues that cause homelessness and hinder sustainment • Undertake regular survey and feedback to gauge customer satisfaction • Promote empowerment and resilience that would enable residents to take greater control of their circumstances • Promote ownership and accountability

Fig 5

7.3 While homelessness is high in specific areas of the borough, we know that homelessness is a broader issue that affects individuals from all backgrounds. It is important for Oldham's residents to receive and experience the benefits of an Inclusive Economy, Co-operative Services, and Thriving Communities irrespective of their situation, especially at their time of need.

7.4 The proposed delivery models are closely connected to the Council's specific corporate goals identified in the Oldham Plan themes detailed in Fig 5. The TA Strategy will work in-sync with the Council's corporate and strategic objectives which aim to make a positive difference to the lives of Oldham residents:

- Improved health and wellbeing – through better support in TA, residents can gain the skills to sustain and live a healthier lifestyle. A tailored, person centered support model would help reduce repeat

homelessness, promote healthier lifestyle that could lead positive outcomes for Oldham's residents and services

- Better quality temporary accommodation – the proposed delivery models rely on maximising the use of the private sector; ensuring the standard of TA brought online supports the Council's strategic aims of improving housing conditions in the private sector. Ultimately, this will deliver long lasting benefits to all residents, whether they are experiencing homelessness or not
- Opportunities to deliver additional services – relieving pressure on the TA budget would provide greater flexibility for the Council to fund additional services that, could benefit residents in other ways, for example, fund the development of a tenancy training programme within TA.