

Property and Housing Services
**Temporary Accommodation
Placement Policy (2025)**

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1. Introduction

1.1 Purpose of this Policy

The purpose of this policy is to set out Havering Council's ('the Council') approach to responding to homelessness in the borough in relation to the placement (i.e. the allocation) of temporary accommodation ("TA").

It covers both interim emergency placements (under Section 188 of the Housing Act 1996), and longer-term placements/settled private rented sector accommodation (under Section 193 of the Housing Act 1996).

1.2 Aim of this policy

The aim of this policy is to ensure that all placements are made into suitable accommodation, thereby meeting the Council's statutory duty to people who are homeless or are at risk of homelessness.

In line with Section.208 of the Housing Act 1996, insofar as reasonably practicable, the Council will discharge its housing duties by securing accommodation available for occupation within the borough of Havering.

Due to the limited availability of affordable accommodation and increasing demand, it is no longer reasonably practicable to provide accommodation within the borough to all homeless households. Therefore, the Council intends to increase supply of accommodation by procuring properties wherever available both within and out of borough.

Our primary aim is to:

- Provide clear information on how decisions about placements are made
- Make best use of the Council's available accommodation resources
- Review the households housing need throughout their TA placements
- Comply with the Homelessness Code of Guidance 2006, Homelessness (Suitability of Accommodation) Order 2012 and case laws including *Nzolameso v City of Westminster* 2015.

1.3 Scope of this policy

The scope of this policy extends to all Housing staff and all households in statutory need of emergency and temporary accommodation.

The Council has a separate allocation policy (Housing Allocation policy) which deals with accommodation provided under Part 6 of the Housing Act 1996 and applies to people seeking permanent Council accommodation.

2. Background

The rising demand for temporary accommodation and homelessness is rooted in the wider, national housing problem.

Population growth; lack of affordable housing options; cost of living crisis and low turnover in the social rented sector has made demand for social housing particularly acute in London boroughs.

The demand for temporary and settled accommodation arises not only from new homeless applications and statutory homeless cases, but also from existing TA tenants with an urgent need to transfer into alternative temporary accommodation that is suitable for their household needs.

Examples include people needing to transfer because of threat to life; domestic violence; critical safeguarding issues; health or medical needs due to the unsuitability of accommodation; under-occupation, overcrowding, or when the Private Sector Landlord (PSL) ends the lease agreement by requesting the property is handed back.

In addition, the Council works with Social Care to assist in meeting their care duties by arranging accommodation for some client groups, including families and leaving care.

The Council also supports the refugee crisis where vulnerable people who, through for no fault of their own, are forced to flee their country to find safety and stability.

3. Current supply of Temporary Accommodation in Havering

3.1 Housing options

The Council provide a short-term, interim accommodation solution until a suitable longer-term solution is found.

The Council employs a range of housing options to help fulfil its housing duty to accommodate eligible applicants. These take the form of:

- **Hotel accommodation**
To relieve immediate homeless for both single people and families. Placement could be inside or outside of the borough, depending on availability. Outreach support is also provided.
- **Nightly Let accommodation**
Self-contained, furnished (to varying degrees) accommodation with cooking and washing facilities, both inside and outside of the borough. Outreach support is also provided.

- **Hostel accommodation**
For homeless family applicants, a self-contained room with sleeping, cooking and bathroom. Laundry rooms and staff available on site for support.
- **Complex Needs accommodation**
Accommodation for homeless, single applicants with complex needs that require on-site intensive support.
- **Private-Sector Leased (PSL) accommodation**
Accommodation that the Council leases for use by homeless households, managed and supported by a dedicated team of Council officers. These properties can be located both within and outside the borough.
- **Short-life accommodation**
Council-owned properties that are currently available whilst awaiting redevelopment/demolition. Managed and supported by a dedicated team of Council officers, these properties are usually form part of a wider, regeneration scheme).
- **Emergency room sheltered accommodation**
A form of sheltered housing for people aged 55+ who are normally able to live quite independently, but who now may require extra support such as the installation of an emergency alarm system, or the presence of a premises warden. On-site support is provided.

In direct response to the current housing crisis, the Council is now using hotel establishments and nightly-charged accommodation to fulfil its statutory duty in providing temporary accommodation.

In emergency homeless circumstances, it is likely that the applicant will initially be provided with a hotel or nightly let accommodation. Placement will be sought, if possible, inside the borough. But due to lack of availability, it will very likely be outside of the borough.

3.2 Temporary Accommodation supply

The table below shows the current temporary accommodation supply:

Accommodation Type (as at August 2024)	Supply
Complex Needs Supported Housing (for single homeless only)	58
Hostel	128
PSL	450
Of which are outside the borough	49
Short Life	333
Current use of Hotel	63
Current use of Nightly Lets	162

4. Accommodation location

There are three location types used for temporary accommodation and private sector renting placements:

Location 1 – Within the London Borough of Havering

Households that have a need to remain, or be placed, within Havering.

Possible reasons for the provision of in-borough accommodation include medical circumstances; support from professional agencies; school and the safety of the household. The degree of ability to travel into the borough from outside will also be taken into consideration.

Location 2 - Out of borough

All London Boroughs

Essex and further South East Region including but not limited to: Thurrock, Southend, Rochford, Basildon, Wickford

Whenever possible, the placement will be made at a location within a reasonable commuting distance of the school, college, workplace or medical support. This location will also take into consideration length of time of placement - 6 months or beyond.

Location 3 – Any Other Location

Other out of borough locations with no local connection to Havering, but where it is safe, affordable, supports settled accommodation and is able to re-locate to without serious detriment of harm to the household.

Location is not a guarantee of placement within the relevant area and is subject to suitable accommodation being available.

Each placement application will be taken into carefully considered, together with any required supporting information, such as the homeless assessment; personal housing plans; housing needs assessment and support plans, and from any voluntary or professional agency involved with supporting the household.

It is important that all required information is provided and kept updated to enable the Council to provide accommodation that is suitable.

Households will be required to provide documentary evidence that demonstrate their needs. The Council's Medical Adviser may also need to assess the applicants' circumstances, where appropriate.

4.1 Criteria of Location

Table1 sets out in further detail reasons for each location:

Table 1

Accommodation Location	Consideration of Placement
Location 1 – London Borough of Havering	<ul style="list-style-type: none"> • Households where children have a Special Educational Needs or an Education, Health and Care Plan (EHCP), and is receiving education or educational support in Havering where it is demonstrated that a placement elsewhere would be seriously detrimental to their wellbeing. • Households have a severe health condition or disability (including a severe mental health condition) that is long-term and requires intensive and specialised medical treatment/ aftercare that is either only available in Havering or where a transfer of care would create serious risk to their safety or the sustainability of the treatment or care plan. • Households receiving support through a commissioned care package by health or social care in Havering and where a transfer of care would create serious risk to their safety or the sustainability of the care. • Household that is leaving care or placed under the Council's care (Housing and Children's protocol) • It is affordable for household • Households that have children studying and taking exams, year groups 11-13
Location 2 – Out of borough, Essex, London and (South East) region	<ul style="list-style-type: none"> • Where the applicant or household requires to remain out of the borough to keep them safe from harm, this could be temporarily or permanently. • Household has the means to travel to their place of work, college or school • The accommodation is affordable • The placement is reasonably perceived longer than 6 months • Households support can be transferred without serve detrimental to the individual • Household access to services, amenities and place of worship is reasonable distance to travel
Location 3 – Any other location	<ul style="list-style-type: none"> • Whereby there is no local connection to Havering • Households successful securing assured shorthold tenancies through schemes such as Find Your Own or HomeFinder • Households that express preference to relocate beyond Havering • Households that are in longer term settled accommodation provided by the Council

5. Suitability of Temporary Accommodation

This policy sets out the key tests that will be used to ensure that the Council makes suitable placements into accommodation by ensuring that:

- the property meets the standards sets out the [Suitability Regulations](#)
- the circumstances of the applicant have been considered in terms of the location of the property, and
- the applicant is able to afford to live in the property, taking into account their income once they have paid the rent. Accommodation may be located outside of the borough if this is more affordable.

These tests will apply to all placements of interim, longer term temporary or settled temporary accommodation. Dedicated Council officers will complete an assessment of all household members to inform placement decisions.

In consideration from the applicant's Personalised Housing Plan (PHP), which will be completed as part of the homeless application, placement into suitable accommodation will be provided to relieve the immediate homelessness. The accommodation may be of the type that the applicant wishes, however it will be safe and secure until longer-term accommodation becomes available.

A Housing Needs assessment will be completed to continually review the household's needs and suitability of the current accommodation being occupied. This will also inform officers of the Move-on plan and provision of accommodation throughout the temporary accommodation journey.

5.1 - Out-of-Borough Placements

Individual circumstances that may affect the move to an out-of-borough placement will always be carefully considered before reaching a decision about the location of the TA. The decision will be made in line with the judgement made by the Supreme Court; *Nzolameso V Westminster City Council* 2015, which makes clear that local authorities are required to secure accommodation within their own district "so far as reasonably practicable."

So far as reasonably practicable the Council shall secure that accommodation is available for the occupation of the applicant in their district (Homelessness (Suitability of Accommodation) (England) Order 2012 s208(1).

The Order also requires the authority, when determining suitability, to take into account distance from the authority's borough; disruption to employment; caring responsibilities and education; proximity of medical facilities, and other support & local services.

The Council is not required to keep under constant review placements in hope that closer accommodation with "turn up": *Alibkhiat v Brent LBC* (2018).

When an applicant is placed out-of-borough in longer-term temporary accommodation, the host borough will be notified in line with the duties under Section 208 of the Housing Act 1996.

Where reasonably practical, potential placements outside the borough, involving vulnerable adults or children with care and support needs, will be preceded by a multi-agency planning discussion or meeting to determine future support needs. The Council will arrange a move subject to availability of suitable accommodation.

5.2 - Accommodation suitability and room/space standard

In deciding whether the TA is 'suitable', local authorities are required to take into account the provisions in:

- [Suitability of Accommodation Order 2012](#)
- [Homelessness Code of Guidance 2018](#)

The Council is committed to ensuring that TA allocated to the eligible applicant, and anyone who might reasonably be expected to reside with them, is suitable for occupation. That is to say that the TA offered is:

- Suitable accommodation for households with particular medical and/or physical needs. Physical access to and around the home, space, bathroom and kitchen facilities, and modifications to assist people with sensory loss as well as mobility needs are all factors which might need to be taken into account.
- Account will be taken of any social considerations relating to the applicant and their household that might affect the suitability of accommodation, including any risk of violence, racial or other harassment in a particular locality.

Accommodation that is suitable for a short period may not necessarily be suitable for a longer period.

If the main duty is accepted, the Council may provide alternative accommodation such as PSL, short life or supported living.

The Council has an obligation to keep the suitability of accommodation under review for applicants where the duty is ongoing. To respond to any relevant change in circumstances, which may affect suitability until the accommodation duty is brought to an end.

The Council will be alert to circumstances in which the suitability of accommodation will require more regular review because the applicant's needs are likely to frequently change; for example, for applicants who are terminally ill and in need of palliative care.

TA placement will be considered suitable if it meets the above conditions.

The Council is committed to ensuring the most effective use of its limited social housing stock by making sure those properties are not being under-occupied. Consequently, the size of property offered to the applicant will be dependent on the size of the household.

A lounge is considered an additional 'sleeping area', as it is not always possible to provide a separate living room.

Whilst the Council carries out their assessment of the applicant's duty, as aforementioned in section 3.1 (above), the interim placement in this current housing climate will likely to be a hotel and placement outside of the borough.

Special consideration will be given in circumstances where extra storage for specialist medical equipment is required, or for when separate sleeping arrangements for other members of the applicant's household for medical reasons are required.

5.3 - Pets

The Council recognises that our homeless applicants may need to keep pets whilst being housed in accommodation under the Homelessness statute. Where possible we will endeavour to accommodate a household pet where it is suitable and the accommodation type permits pets. Most hotels, nightly charged accommodation and hostels do not permit pets.

Under current homelessness legislation, pets are not considered to be part of the household. If there are no properties available where a pet is allowed to reside in, then the pet will not be taken into consideration when making a suitable placement of temporary accommodation. By way of explanation the Homelessness Code of Guidance states:

"Housing authorities will need to be sensitive to importance of pets to some applicant, particularly elderly people, rough sleepers who may rely on pets for companionship. Although it will not always be possible to make provisions for pets, the secretary of state recommends that housing authorities give careful consideration to this aspect when making provision for applicants who wish to retain their pet"

If the homeless applicant is unable to re-home their pet/s with family or friends and the Council provided emergency accommodation that do not permit pets, local charities can be accessed at the cost of the applicant.

- [The Freedom Project](#) – run by Dogs Trust in many parts of England and Scotland
- [Paws Protect](#) – run by Cats Protection in London and the South East

The Council is not obliged to pay accommodation costs for pets.

The Council will take into account guide dogs and whereby a dog is an assistance dog that has supporting evidence from medical professionals that the applicant is in need medically not to be separated from their pet.

When placed in long-term temporary accommodation, the household will enter into a tenancy agreement which will specify the terms and conditions in relation to pets.

5.4 - Protection of Property

The Council has a duty to protect belongings in some circumstances if they have reason to believe that an applicant's property (or that of a member of their household):

- is in danger of loss or damage because the applicant is unable to protect it, and
- no other suitable arrangements have been made

The local authority has a duty to protect a person's property if they owe them:

- prevention or relief duties
- interim accommodation duty
- main housing duty
- duty to intentionally homeless applicants in priority need
- duty to applicants whose case is considered for referral or referred

The Housing Act 1996, Section 212, is updated with all changes known to be in force on or before 01 October 2023. This means if the applicant is unable to find alternative arrangements to store their personal belongings, the Council will assist. Only in exceptional circumstances will the Council pay the cost of storage, pending a full financial review.

Personal property comprises essential items such as beds, furniture, white goods that belonged to the applicant before homelessness and can furnish their temporary accommodation when allocated. It does not include commercial/business goods.

If storage is necessary, the Council will not pay for more expensive accessible storage and unreasonable larger than required units. The Council will use a reputable company to store belongings that are insurance-protected.

6. Temporary Accommodation Placements

The applicant's journey begins with the use of hotel or nightly lets to provide emergency temporary accommodation to households that present as homeless.

The applicant will receive communication from the Homeless Placement and Move-On Officers, and is expected to:

- sign a licence agreement
- claim housing benefit
- keep to hotel rules
- occupy the accommodation
- check out and leave on time
- If duty has been discharge you must leave the accommodation giving vacant possession

Only people on the homeless application will be permitted to occupy room.

At peak times such as school holidays, local hotels may become unavailable and the

applicant will likely to be placed in a hotel outside of the borough. The Council will consider the applicant's household's needs from their PHP.

Nightly lets and blocked booked hotels do not require re-booking; household occupation will remain effective until alternative accommodation becomes available.

Officers will continue to monitor availability of accommodation to move applicants out of hotels and nightly lets and into longer-term TA as soon as possible.

6.1 - Move-On Placements

All placements will be processed in date order from the initial emergency placement, with due consideration to;

- the size of household
- the medical needs in relation to the applicant's housing needs
- the suitability of available accommodation
- the location needs of the applicant

The move-on plan from hotels and nightly lets to longer-term accommodation is likely to take some time, and the applicant should join the housing register (i.e. the housing waiting list) if eligible to apply and seek to find your own private rented accommodation.

6.2 - Hostel Temporary Accommodation

Our hostel accommodation is mainly shared facilities.

Unlike hotels, they have access to cooking facilities and laundry rooms. Officers are on-site between 9am and 5pm, Mondays to Fridays to provide support. An on-site security service is in place outside these times.

The applicant will be expected to:

- Sign a licence agreement
- Claim housing benefit
- Pay rent/service charges
- Occupy the accommodation
- Respect staff and other residents
- Respect and obey hostel rules
- Join the housing register if eligible
- Get prepared for moving into unfurnished accommodation

6.3 - Longer-Term Temporary Accommodation (PSL/Shortlife)

Placement into longer-term TA is provided from the placement and move-on list which is made up from all types of households in TA.

This could be through the customer's TA journey; internal moves (whereby accommodation is no longer suitable and the household needs alternative housing) or the PSL accommodation is being handed back to the owner.

Officers will consider the length of time in emergency accommodation, Personal Housing Plan (PHP), households housing needs, household's composition and match applicant to available accommodation soon to be ready for letting.

Applicants must:

View the accommodation provided when asked	Failure to do so will result in the accommodation being offered to another
Pay any outstanding arrears owed to the Council	Failure to do so will delay your move-on
Prepare for the move	When in emergency TA begin to save to move and furnish your home
Handback your key on time when leaving	If this is not done the locks will be changed and any belongings left in the room or property removed
Move into your new placement	Failure to do so will result in the Council discharging the homeless duty

7. Consequence of refusing a Placement

Applicants are encouraged to take up occupation of the placement provided by the Council or they may be at risk having their housing duty discharged.

Section 202 of the Housing Act (1996) gives the applicant the right to request a suitability review and subsequent appeal of the accommodation provided under the main housing duty. Requests must be made in writing, letter or email within 21 days of the offer being made.

In order for the Council's main housing duty to continue, the applicant must accept the accommodation and seek a suitability review.

The applicant has the right to request a review if refusing a placement offered by the Council. Whilst the request for a review is being considered, unless the applicant can demonstrate that in moving the household would be placed in immediate risk of harm, the household will request interim accommodation until the decision is reached by the Appeals and Review Officer.

The Council is not under any obligation to provide alternative accommodation whilst it reviews a decision; unless there are extenuating circumstances, or if it believes that a mistake was made on their part when the original placement was made.

The Council must provide its decision within 56 days of receiving the request.

If the review concludes that the accommodation provided is suitable, alternative accommodation will not be sourced and offered. The applicant will be notified of the outcome in writing ensuring factors, such as affordability, proximity to services, and household needs, considered in the review decision are clearly outlined, such as.

For all types of TA provision, the applicant will receive a discharge of housing duty letter. This means that the hotel room or nightly-charged accommodation will not be re-booked and the household must leave.

If the applicant is occupying a hostel room, they will receive both the review and discharge letters and then arrangements for a lock change will be sought by the hostel team and the household must leave.

Should the accommodation provided is long-term TA, an application to the County Court will be sought for vacant possession of the property and eviction.

8. Staff Training

Recognising that well-trained staff are key to the successful delivery of this policy, it will be covered in inductions for new officers and “refreshers” will be mandatory for current staff.

Unconscious bias training will also be made available to ensure that the important intersections with other inequalities and disproportionalities are well understood by officers.

9. Equal Opportunities statement

9.1 - The Public Sector Equality Duty (PSED)

The Public Sector Equality Duty (PSED) under section 149 of the Equality Act 2010 requires the Council, when exercising its functions, to have ‘due regard’ to:

- i) The need to eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- ii) The need to advance equality of opportunity between persons who share protected characteristics and those who do not, and
- iii) Foster good relations between those who have protected characteristics and those who do not.

Note: ‘Protected characteristics’ are age, sex, race, disability, sexual orientation, marriage and civil partnerships, religion or belief, pregnancy and maternity and gender reassignment.

The Council is committed to all of the above in the provision, procurement and commissioning of its services, and the employment of its workforce. In addition, the Council is also committed to improving the quality of life and wellbeing for all Havering residents in respect of socio-economics and health determinants.

9.2 - EqHIA

An EqHIA (Equality and Health Impact Assessment) has been carried out and accompanies this policy. The Council seeks to ensure equality, inclusion, and dignity for all in all situations. The Council will seek to ensure that this policy is, at all times, implemented in a manner that is fair to all sections of the local community.

9.3 - Translation and Interpretation services

All applicants for housing or re-housing will be invited to indicate if they wish to make use of the Council's translation and interpretation services, or if they require additional services to enable them to access and understand the policy to ensure that they are not disadvantaged in any way.

They also will be invited to provide details of ethnic origin, sexuality, disability and other equalities information. Provision of this information is not obligatory or a requirement for acceptance of an application.

However, such information will help monitor the number and types of protected characteristics requiring hostel support, and will help ensure that service improvement evolves in line with any changing local needs.

Equalities records will be kept and monitored to ensure hostel accommodations are offered and allocated fairly. This policy will be regularly reviewed ensure it is not operated in any way that could discriminate or disadvantage against any particular group of people. All information provided will be kept confidential and treated with respect at all times.

10. Data Protection statement

Havering Council takes personal privacy matters very seriously and will never share the individual's personal data without their prior knowledge, unless required to do so by law.

For full details about how the Council protects personal data, please visit [Havering Council Data Protection policy](#).

11. Dissemination and communications of this policy

Property and Housing Services will consult with all affected stakeholders, directly or indirectly, to ensure this policy fulfils its purpose to be clear and transparent.

This policy will be made available internally and externally in hard copy and electronic versions, as well as various formats – such as easy read, multi-lingual, braille and audio - upon request.

12. Implementation of this policy

This policy will take effect from August 2025.

Responsibility for the successful implementation of this policy will be with Havering Council's Assistant Director of Housing Demand.

13. Monitoring and review of this policy

In the interests of continuous improvement, this policy will be reviewed every three years to ensure it remains relevant, up-to-date and fit-for-purpose for the Council and the residents of Havering.

We will carry out regular quality checks on cases managed by our staff.

14. Delegated authority to make minor changes to this policy

The Assistant Director of Housing Demand, in consultation with the Director of Property and Housing, will be able to approve minor amendments; i.e. amendments that do not significantly change this policy or associated procedures.