



# **Homelessness & Rough Sleeping Strategy 2022-2027**

**Consultation draft**

## Homelessness & Rough Sleeping Strategy 2022-2027 – Consultation draft

### Contents

1. Introduction
2. Vision and Summary of the Key Objective over the next 5 years
3. Legal background and the purpose of the review and strategy
4. Defining homelessness
5. Cost of homelessness
6. National & Local Context
7. Strategic fit
8. The Homelessness Review
9. The Key Objectives
10. Consultation
11. Resourcing the Strategy
12. Monitoring and Review
13. The Action Plan
14. Equality Impact Assessment
15. Publication
16. Appendices

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## Homelessness & Rough Sleeping Strategy 2022-2027

### 1. Forward & Introduction

### 2. Vision & Summary of the Key Objectives over the next 5 years

This Homelessness and Rough Sleeping Strategy sets out how Epsom & Ewell Borough Council intends to meet the needs of our residents who are homeless or at risk of homelessness, including rough sleeping and single people over the next 5 years.

The strategy outlines our strategic vision and the key objectives we aim to achieve when addressing homelessness within the borough. It sets out our commitment to preventing homelessness at an earlier stage and how we will work with our partners across all sectors to develop an integrated approach to tackling homelessness and rough sleeping.

Our strategic vision is to see: ***“The council and its partners working collaboratively to prevent homelessness, to proactively reduce and end rough sleeping, assist homeless households to find affordable housing solutions and ensure the right support is available to promote recovery and improve health and wellbeing.”***

The Homelessness and Rough Sleeping Strategy is informed by a detailed review of all forms of homelessness within the borough. The priorities identified in the strategy are based on the findings in the review.

In this strategy we have identified six key objectives for the next 5 years and these emphasise the importance of early intervention and prevention as promoted in the Homelessness Reduction Act 2017. Each objective is supported by a number of actions to enable the priorities to be achieved.

These six key objectives are:-

1. The early identification, intervention & prevention of homelessness
2. Reduce Rough Sleeping
3. Increase accommodation options
  - Social Rented Housing
  - Private Rented Accommodation
  - Supported and move-on Accommodation
  - In-borough Temporary Accommodation
4. Improve the Health & Wellbeing of homeless people
5. Ensuring sufficient support is available for homeless people
6. Partnership working

Delivery of the strategy will be supported by an Action Plan, which sets out the individual actions and activities to be undertaken and details how the Council will achieve the aims and objectives of the strategy. The strategy and Action Plan will be monitored and reviewed on an annual basis through a multi-agency Homelessness Forum.

### 3. Legal background and the purpose of the review and strategy

The Homelessness Act 2002 places a duty on every local authority to develop and publish a Homelessness Strategy, setting out how the local authority intends to tackle and prevent homelessness in their area.

The strategy must be based on a review of all forms of homelessness within that local authority's area and should be reviewed at least every five years. The purpose of the Homelessness Review is to establish the extent of homelessness in the area, identify future trends and any gaps in the service currently being provided.

The review should assess the:

- Levels and likely future levels of homelessness in the borough
- Activities that are carried out which prevent homelessness, secure accommodation for homeless people and provide support to people who are or may become homeless

- Resources available to carry out these activities.

In addition, the Homelessness Code of Guidance for local authorities sets out some requirements for a Homelessness Strategy. It should:

- Link to the wider contributory factors of homelessness, such as health, wellbeing, employment and economic factors.
- Be consistent with other corporate strategies and objectives.
- Involve partners in implementing the strategic homelessness objectives.
- Have an Action Plan to show how the strategic objectives will be achieved.
- Be monitored and reviewed during the life of the Strategy.

In 2018 the Ministry of Housing Communities and Local Government (MHCLG) also published its “Rough Sleeping Strategy” which set out the government’s vision “to support every person who sleeps rough off the streets and into a home”; to halve rough sleeping by 2022 and ending it by 2027. It focuses on three key themes: Prevention; Intervention; and Recovery. In 2021 this was further enhanced to include Systems Support to embed change and monitor progress.

#### **4. Defining homelessness**

Crisis defines Homelessness as follows: -

“Homelessness is about more than rooflessness. A home is not just a physical space, it also has a legal and social dimension. A home provides roots, identity, a sense of belonging and a place of emotional wellbeing. Homelessness is about the loss of all these. It is an isolating and destructive experience and homeless people are some of the most vulnerable and socially excluded in our society.”

Homelessness includes:

##### **Statutory Homelessness:**

The Housing Act 1996 defines homelessness as “A household is legally homeless if, either, they do not have accommodation that they are entitled to occupy, which is accessible and physically available to them, or they have accommodation but it is not reasonable for them to continue to occupy this accommodation”

The Homelessness Reduction Act 2017 came into force on 3 April 2018. It has made significant changes to Part 7 of the 1996 Act. Its main effect is to place increased duties on local authorities to assess an applicant’s needs and to prevent and relieve homelessness.

A person is threatened with homelessness if it is likely that they will become homeless within 56 days. Where a person is threatened with homelessness, the Council will owe that person a prevention duty and must take reasonable steps to prevent them from becoming homeless either by helping to avoid the loss of their existing accommodation or by trying to help them find new accommodation before they become homeless.

When a person is already homeless or becomes homeless after the prevention stage, the Council will owe that person a relief duty for up to 56 days and must take or continue to take reasonable steps to relieve them from being homeless by trying to help them find new accommodation.

Under both the prevention and relief stage the Council will have a duty to carry out an assessment with the person to look into the circumstances that caused them to become homeless or threatened with homelessness and to establish their housing and support needs. A Personalised Housing Plan will then be agreed which will set out the actions (or ‘reasonable steps’) to be taken by the Council and the person to help them remain in their current accommodation or to find alternative accommodation.

If the person is homeless or threatened with homelessness the Council will have some form of duty towards them. This ranges from advice and assistance, or providing interim or temporary accommodation, to a main housing duty of securing accommodation for a continuing period.

The extent of the duty will depend on whether or not they are eligible for assistance, in priority need, intentionally homeless, or have a local connection. The Council will also be required to carry out enquiries and assess what duty, if any, may be owed to the person under the homelessness legislation.

It is important to note that there is only a duty to secure interim accommodation for those who are eligible for assistance and have a priority need.

The priority need categories are set out in Part 7 of the Housing Act 1996 and these are:

- Pregnant women
- Households with dependent children
- 16 and 17 year olds
- Care leavers aged 18,19 or 20
- People made homeless by an emergency
- People vulnerable as a result of old age, mental illness or physical disability, having been in care, having served in the armed forces, having been in custody, having to leave accommodation because of violence or abuse or vulnerable for some other special reason.

**Hidden/Concealed homelessness:** These are individuals or households who do not have access to suitable housing, but who may be staying with friends or family on a very short-term basis or who need to move because they are living in insecure or overcrowded circumstances. They are sometimes referred to as “sofa surfers” and are often not known to services. This can also include those who have no recourse to public funds.

**Rough Sleeping:** Rough sleepers are those who sleep or live on the streets and this is the most visible form of homelessness. Many of those sleeping rough or with a history of rough sleeping have multiple and complex needs with the predominant factors being poor mental health and substance misuse. Other characteristics are offending, low self-esteem, unemployment, chaotic behaviour, and some are difficult to engage.

## 5. Cost of homelessness

### Human Cost

The impact of homelessness on people is huge, particularly children born into homelessness. Research shows that homeless infants experience a significant decline in general development function between 4 and 40 months. Evidence also shows that being homeless or in temporary accommodation during pregnancy are associated with an increased risk of preterm birth, low birth weight, poor mental health in infants and children and developmental delay. All of these factors are, in turn, associated with the risk of poor outcomes in later life. As a result of a preoccupation with addressing their unstable and unsafe living conditions, a person’s capacity to effectively parent can be significantly impaired.

For a lot of people who face homelessness, this is not the only issue. Homelessness is closely linked with multiple and complex needs such as mental health problems, drugs and alcohol dependencies, experience of prison or care systems. A traumatic childhood is often part of a homeless person’s life history. There is significant evidence that links homelessness with the impact on a person’s health and wellbeing. Homeless households often experience health inequalities, poorer health and wellbeing as well as a lower life expectancy than the general population.

### Financial Cost

The financial cost of dealing with homelessness is high, with the National Audit Office estimating that the cost of homelessness in all its forms to be in excess of £1 billion per year. For Epsom and Ewell Borough Council the current anticipated spend on homelessness for 2021/22 is expected to be £1.997 million. This comprises of staffing, costs associated with homelessness prevention measures such as the Rent Depot Scheme, Sanctuary Scheme and the provision of temporary and nightly paid accommodation.

The associated costs of homelessness do not only fall on a local housing authority. Homeless people typically require additional support from other public services such as police, hospitals, GPs etc. Evidence shows that people who experience homelessness for three months or longer cost on average £4,298 per person to the NHS service, £2,099 per person for mental health services and £11,991 per person in contact with the criminal justice system. The impact of homelessness is significant on the person, the community and on public services.

## 6. Context of Homelessness

### 6.1 National Context

The Government's White Paper on housing, 'Fixing our broken housing market', in March 2018 acknowledged the scale of the problem in providing a range of housing that meets a cross-section of need. Without a cure to the imbalance in the market, the result has been a national increase in all forms of housing need, exhibiting itself in the most acute forms of housing need – homelessness and rough sleeping.

Figures released by the then Ministry for Housing, Communities and Local Government (now DLUHC) show there were 96,060 households in temporary accommodation at the end of September 2021. This was a 1.5% increase on the number a year previously and is part of a long-term increase.

Affordability and the issue of households on low incomes being able to resolve their housing need is particularly challenging in London and the South East.

The Local Housing Allowance (LHA) has not kept pace with the market resulting in an increasingly unaffordable private rented market for households on low incomes who are dependent either wholly or in part for assistance with their housing costs. A direct correlation can be made between the increasing disparity between the LHA and the increase in the number of homelessness applications resulting from a loss of accommodation within that sector.

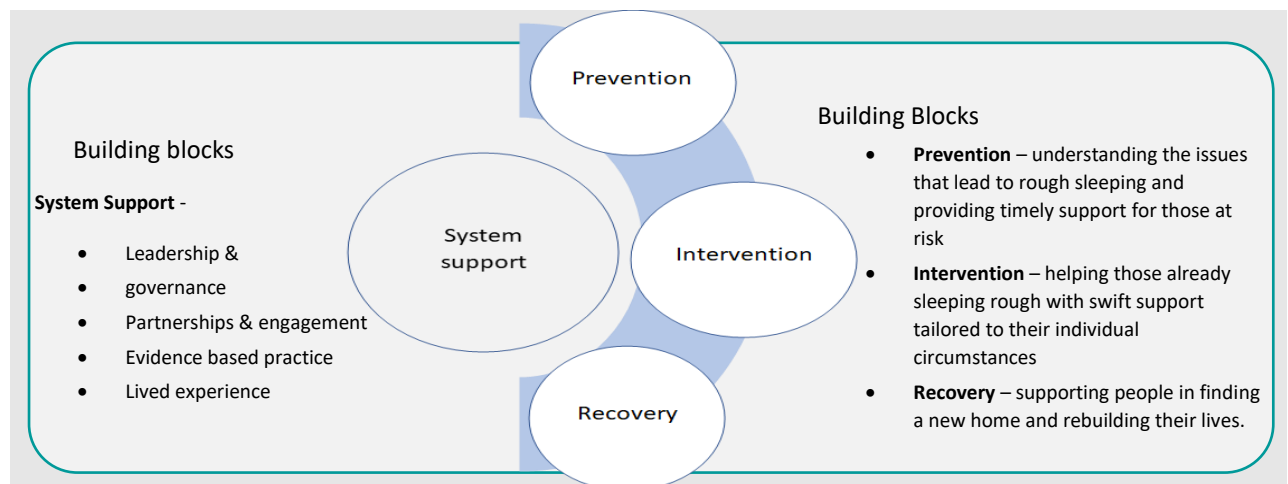
### Homelessness Reduction Act 2017

Homeless households are provided with assistance under Part VII of the Housing Act 1996, as amended by the Homelessness Act 2002 and the Homelessness Reduction Act 2017 ('the HRA'), which came into force on 3rd April 2018. The HRA renewed the focus on preventing and relieving homelessness, placing duties on local authorities to intervene at earlier stages, and to provide homelessness services to all those affected, not just those in priority need.

On 1st October 2018 the 'duty to refer' process came into force, giving certain public bodies a legal duty to refer households who are homeless or threatened with homelessness to a local authority for advice and assistance. Whilst registered providers do not have a duty to refer, a number have signed up to the 'Commitment to Refer', which is a voluntary commitment to make referrals. The Council encourages registered providers with housing stock in the borough to adopt such practices as it provides earlier opportunities to intervene and potentially prevent homelessness.

### Rough Sleeping Strategy

The Government published a Rough Sleeping Strategy in August 2018 that lays out their commitment to halve rough sleeping by 2022 and end it by 2027. Work to deliver these aims is built around three core pillars: Prevention (understanding the issues that lead to rough sleeping and providing timely support for those at risk), Intervention (helping those already sleeping rough with swift support tailored to their individual circumstances) and Recovery (supporting people in finding a new home and rebuilding their lives). In 2021 this was further enhanced to include Systems Support to embed change and monitor progress.



The strategy acknowledges that ending rough sleeping will require central and local government, as well as business, communities, faith and voluntary groups and the general public to work together to tackle the problem.

## **Welfare Reform**

Welfare reforms presents ongoing challenges to households in receipt of benefits and to the organisations and individuals that house and support them.

Most notably local authorities and social housing providers have reported its impact on claimants' ability to meet their household costs and there has been a reported increase in rent arrears and issues of affordability across all sectors.

- **Benefit Cap** – Benefits have been capped to limit the amount households can receive unless they are working for the required hours: Outside Greater London this is £384.62 per week (£1,666.67 per month or £20,000 per year) for couples and lone parents and £257.69 per week (£1,116.67 per month or £13,400 per year) for single adults.
- **Single Room Rate** – Single people under the age of 35 are only able to claim the single room Local Housing Allowance Rate – this is the rate of a room in a shared house. This makes it very difficult for those under 35 to secure a home in the private rented sector that they can afford.
- **Spare Room Subsidy** – Children of different sexes are expected to share a bedroom until aged 10 and of the same sex until aged 16. Housing benefit/Universal Credit is calculated on this basis and where families are 'under-occupying', tenants are required to meet any shortfall in rent.
- **Local Housing Allowance** – In 2016 Local Housing Allowance (LHA) rates were frozen for four years until 2020.
- **Personal Independence Payment** – Personal Independence Payment (PIP) has replaced Disability Living Allowance (DLA) for people aged 16 to 64 making new claims. This is based on how a person's condition affects them, not the condition they have.
- **Universal Credit** – Universal Credit (UC) sees all working age benefits (excluding Personal Independence Payment and Carer's Allowance) rolled into one single monthly payment. This payment includes the housing element and is paid direct to the tenant.

In 2018 Crisis report **Preventing Homelessness its everybody's business**, focussed on actions for 5 government departments, with key recommendations:

- The Department for Work and Pensions should establish a network of housing and homelessness specialists in Jobcentres to ensure that once people are rehoused they are also supported to move into employment.
- The Ministry of Justice should include successfully meeting the long-term accommodation needs of people leaving prison as a measure of success in the new probation contracts. They should also ensure that evidence-based housing-led solutions that have proved effective at preventing homelessness for prison leavers, such as Critical Time Interventions, are implemented consistently across the country.
- The Department of Health and Social Care should require every hospital that sees more than 200 homeless patients each year to have a full Pathway team, including a GP, nursing staff, care navigators and a dedicated housing worker. The Home Office should extend the 28 day move on period for newly recognised refugees to at least 56 days to ensure that local authorities have sufficient time to work with a household to prevent them from becoming homeless.
- The Home Office should require the police to ask every victim of domestic abuse whether they need help and support with housing. If the person consents, then the police should make a referral to the local housing authority.
- The Department for Education should ensure that evidence-based housing-led solutions, such as Critical Time Interventions, are part of the housing and support options available for young people leaving care.

## **Domestic Abuse Act 2021**

A new Domestic Abuse Act came into force in 2021 which places new duties on local authorities. The measures in the Act include:

- A statutory definition of domestic abuse, emphasising that domestic abuse is not just physical violence, but can also be emotional, coercive or controlling, and economic abuse. As part of this definition, children will be explicitly recognised as victims if they see, hear or otherwise experience the effects of abuse.
- Extending the controlling or coercive behaviour offence to cover post-separation abuse.
- A duty on local authorities in England to provide support to victims of domestic abuse and their children in refuges and other safe accommodation.
- All eligible homeless victims of domestic abuse automatically have 'priority need' for homelessness assistance.
- When local authorities rehouse victims of domestic abuse, they do not lose a secure lifetime or assured tenancy.
- A new Domestic Abuse Protection Notice and Domestic Abuse Protection Order, which will prevent perpetrators from contacting their victims, as well as force them to take positive steps to change their behaviour.

## **Leaving the European Union**

The United Kingdom left the European Union on 31 December 2020. The ramifications for housing-related areas (such as the housing market, the labour market, forecasted and actual population growth, the economy, financing programmes and procurement rules) are as yet unknown.

## **Covid-19 Pandemic and the impact on Housing Services**

The impact of the Pandemic has been far reaching for both the service and our users. The Pandemic led to rapid changes to the way the Housing Services was delivered. Prior to the Pandemic all our clients were seen face to face, with a Housing Option interview. From March 2020 the Housing Services staff had to move to telephone-based interview and communication, with the electronic upload of documentation through the Homechoice website. This has worked well, with many households preferring the convenience of a telephone appointment. A hybrid arrangement is likely to operate in the future, with the opportunity for everyone to have face to face interviews.

Following the UK Covid-19 Lockdown in March 2020, the then Ministry for Housing, Communities & Local Government wrote to all local authorities in England requesting that they all should provide emergency accommodation to protect rough sleepers and those at risk of rough sleeping during the Covid-19 pandemic. This was referred to as "Everyone-In".

This coincided with the closure of most hotels and guest houses across the UK, and the Council had to enter into complex negotiations with providers to procure self-contained accommodation for single homeless people as well as for people and families who were COVID-19 positive.

Under Everyone-In Epsom & Ewell Borough Council accommodated over 60 single people who were either rough sleeping or at risk of rough sleeping and this has led to a rapid increase in the numbers of single people accommodated in emergency accommodation. Many of those accommodated had multiple and complex needs, requiring higher levels of support and management.

The Council staff also undertook weekly welfare calls for the duration of all Lockdowns and were instrumental in helping roll out the vaccine programme to homeless households.

In September 2020, the Council successfully bid for £157, 000 funding under the Next Steps Accommodation Programme (NSAP) to support our work to find housing solutions for those assisted off the street during the Pandemic. This funding meant that we were able to employ a Single Person Homeless Support officer on a 12-month fixed term contract to support and assist those accommodated under Everyone-In to find either supported or private rented accommodation and financially help them with rent in advance and deposits. The funding also contributed to the costs of providing emergency accommodation during the pandemic.



Whilst the numbers of single people being accommodated significantly increased, the numbers of families approaching the Council declined. This was mainly due to the Emergency Covid-19 legislation temporary ban on most forms of evictions. These restrictions were removed in October 2021 and cases are now starting to progress their way through the County Court system. It is anticipated that in 2022/23 a significantly higher number of people will approach the Council as homeless/threatened with homelessness from the private rented sector, many of whom would not have previously needed to use the service before.

The Pandemic has also seen improved collaborative partnership working with Surrey County Council Public Health and several health initiatives have been developed for homeless households.

## **6.2 Local Context**

Epsom and Ewell is a small borough in Surrey, home to approximately 80,000 people. Situated on Surrey's northern border, its nearest neighbours are the London Boroughs of Kingston and Sutton, and the two Surrey districts of Mole Valley and Reigate & Banstead. The borough is extremely well connected, due, in part, to its prime location. It has excellent road and rail links. The M25 and A3 trunk roads are easily accessible, plus central London is less than 30 minutes by train. Both London Heathrow and Gatwick airports are located close by.

Epsom and Ewell is an affluent area where people benefit from an excellent quality of life. Residents enjoy good health, long life expectancy, first class education, and positive levels of employment.

However, this picture does mask pockets of deprivation across the borough, for example, Court Ward is the 4th most deprived ward in Surrey. The borough experiences other challenges as well. The borough is the most densely populated in Surrey. Just over 1,200 children are living in poverty. Despite housing expansion, housing pressures remain due to high prices and low affordability. Rates of homelessness are an on-going concern.

**Population & Household Composition:** The latest population estimate (mid-2017) for the borough is 79,451 (51% female; 49% male).

Epsom and Ewell is the most densely populated borough in Surrey. Comprising an area just over 3,400 hectares (the smallest in Surrey) it has 23.32 persons per hectare. In comparison, Mole Valley, the least densely populated borough, comprises just 3.37 persons per hectare.

The percentage breakdown across three broad age groups closely reflects the county's position: 20.4% are children aged 0-15 years (Surrey 19.6%); 61.4% are aged 16-64 years (Surrey 61.6%); and 18.2% are older people aged 65+ years (Surrey 18.7%). 25.5% of Epsom and Ewell households comprise people aged 65+ only. This is slightly higher than the Surrey average of 24.4% and higher than the national average of 23.7%.

The percentage of people from an ethnic minority group is approximately 14%. Epsom and Ewell ethnic breakdown shows that the two largest ethnic groups are White (86%) and Asian/Asian British (8.6%). Other representation includes 1.5% Black/African/ Caribbean/Black British.

The borough's population is projected to grow by 16.2%. This is the second biggest percentage increase in Surrey, being closely behind Reigate and Banstead at 16.3%. Surrey's population is projected to grow by 10.9%. In line with the national picture, the borough's population is predicted to age. Whereas the number of under 50s will increase by 4.8%, the number of over 50s will increase by 34.2%. Notable changes include a 76.2% increase in the number of people aged 85+ years. The number of under 10s will increase by 3.9%, but will decrease across Surrey as a whole by 3.8%.

**Social Mobility & Deprivation:** Epsom and Ewell is ranked 18th out of 324 local authorities on the Social Mobility Index, the highest of all the Surrey districts.

Epsom and Ewell is one of the 10% least deprived areas in England. Out of 326 areas in the UK, Epsom and Ewell is ranked 310, where 1 is the most deprived. The three most deprived wards in Epsom and Ewell are Court, Ruxley and Town. Out of 193 wards in Surrey, Court is ranked 4th, Ruxley 22nd and Town 52nd.

Between 2014 and 2016 life expectancy at birth for men was 81.6 years and 85.3 years for women. This is slightly higher than the figures for Surrey of 81.4 years and 84.6 years respectively.

The inequalities gap in life expectancy between the most and least deprived is 7 years for men and 2.9 years for women. In Surrey the difference is 5.7 years and 4.4 years respectively. The national inequality range is 9.3 years for men and 7.3 years for women.

There are 1,280 children living in poverty in Epsom and Ewell. Some areas of Court and Ruxley wards have the highest number of children in out-of-work families benefiting from tax credits or child benefits. 7.5% (2,336) of households are estimated to experience fuel poverty. This is less than the Surrey and national averages of 9.7% and 11% respectively.

For Citizens' Advice Epsom and Ewell, the four biggest areas of work in 2017/18 comprised welfare benefits; money advice and debt; housing; and employment.

**Employment:** 83.2% of the borough's population aged 16 - 64 years were economically active between July 2017 and June 2018. This is slightly higher than the equivalent percentage for Surrey at 80.4% and the South East at 81.1%. 86.1% and 80.4% of all males and females respectively aged 16 to 64 years were economically active. Between July 2017 and June 2018, 80.0% of the population aged 16 - 64 years were in employment. This is higher than the equivalent for Surrey at 78.3%. • 3% of the population aged 16 to 64 years were unemployed.

**Out of Work Benefits:** In October 2018 the percentage of claimants aged 16+ was 0.8%. The equivalent for Surrey was 0.7% and 1.4% for the South East.

**Housing:** There are approximately 32,240 dwellings in Epsom and Ewell. 91.9% are private sector owned, 8.1% private registered provided (2600) and 0.1% are local authority owned (includes those owned by other local authorities).

The percentage of private sector properties owned in the borough is higher than the equivalent average for Surrey (88.4%) and nationally (82.6%). The percentage of social housing (or private registered provider) at 8.07%, which is significantly lower than other areas in Surrey, such as Guildford which is 14.1%.

For the year ending December 2017, the median property price for a home in Epsom and Ewell was £470,000. This is £15,000 more than the previous year and £40,000 higher than the median property price in Surrey. Epsom and Ewell ranks the third most expensive borough in Surrey, with median house prices in Elmbridge being the highest at £570,000, and then Mole Valley at £500,000.

For those who work in Epsom and Ewell it is the least affordable place in Surrey to afford property. In 2017 local people could expect to pay 17.8 times their annual workplace-based earnings on purchasing a home. Those who work out of borough but live in Epsom and Ewell could expect to pay 13.07 times their annual salary to afford property. This affordability ratio is higher than the Surrey average of 11.86 and significantly higher when compared to the English (National) average 7.91.

Further information on the Borough Profile can be found - <https://democracy.epsom-ewell.gov.uk/documents/s13315/Future40%20Annex%201.pdf>

## **7. Strategic fit**

Within the Council there are a number of policies and strategies that link with the Homelessness & Rough Sleeping Strategy and it is important that this strategy feeds into the Council's overarching Four Year Plan.

- Four Year Plan
- Local plan & Strategic Housing Market Assessment
- Health & Wellbeing Strategy
- Service Delivery plans
- Housing Allocation Policy

## **8. The Homelessness Review - Understanding homelessness in Epsom & Ewell**

In developing this strategy a detailed review of homelessness in Epsom & Ewell has been undertaken. The purpose of the Homelessness Review is to establish the extent of homelessness in the area, identify future

trends and any gaps in the service currently being provided. The review has considered a range of information including:

- Number of homeless approaches
- Reasons for homelessness
- Homeless Prevention and Relief cases and outcomes
- Support needs of homeless households
- The type of individuals and households becoming homeless
- Households in nightly paid accommodation & in-borough temporary accommodation
- Supply and Demand of Affordable housing - Housing Needs Register and social housing lettings
- Private rented housing & the Rent Deposit Scheme
- Rough Sleeping & Single Homelessness
- The current Housing Options Service & existing homelessness prevention measures

The data within the Homelessness Review will be updated, evaluated and monitored on a regular basis so we are able to predict future trends of homelessness, identify households at risk of homelessness and inform new service improvements.

The Homelessness Review provides comprehensive information to develop the Council's Homelessness and Rough Sleeping Strategy 2022 to 2027. The key findings of the review are presented in the summary below and influence the direction of the Strategy. Full details of the review are provided within the main Homelessness Review document which should be read in conjunction with this strategy.

### **What the Homelessness Review is telling us - Key findings, local trends, and challenges**

#### **Key Findings**

- Homeless approaches to the Housing Options Service have significantly increased since the implementation of the Homelessness Reduction Act and forecasting predictions show that this increase is likely to continue. Between April 2018 and December 2021 the Housing Option Service dealt with 1385 approaches for advice and assistance regarding homelessness.
- Despite the rising demand, the Housing Options Team continues to successfully prevent and relieve homelessness, with a total 1089 cases since 2018.
- The majority of people who approach the Housing Options Service for assistance do so either before they are threatened with homelessness (at the triage stage) or within 56 days before becoming homeless (the prevention stage). However, this is not the case for single people who are more likely to approach the Council when they are actually homeless (at the relief stage).
- The 3 main causes of homelessness are:
  - Asked to leave by family and friends
  - Termination of Assured Shorthold tenancies
  - Domestic Abuse
- 75% of homeless applicants said they had additional support needs. The most prevailing support need for all clients was with their mental health. Amongst the single homeless population the most prevailing support needs were; mental health; a history of rough sleeping; physical ill health/disability; offending; and drug & alcohol dependency. For the other households, including those with children, this was debt/budgeting; physical ill health/disability; and domestic abuse.
- The ethnic origin of homeless households appears to largely reflect the demography of the borough.
- In December 2021 there were a total of 235 homeless households accommodated by the Council in either in-borough temporary accommodation (155) or nightly paid accommodation (80). Of these, 161 households had dependent children, with a total of 302 children.

- The average time a homeless household with children spends in temporary accommodation is 225 weeks or 4.3 years before being offered permanent/settled social housing. This is increasing.
- There are approximately 2600 social housing properties in Epsom and Ewell. The percentage of social housing is at 8.07% and this is significantly lower than other areas in Surrey, such as Guildford which is 14.1%.
- In February 2022 there were 1159 housing applicants on the Council's Housing Needs Register.
- 51% of all applicants on the Housing Needs register have been assessed as having an Urgent or High housing need.
- The 2019 Strategic Housing Market Assessment (SHMA) estimated that the overall net annual need for affordable housing is 349 units per annum.
- Less than 90 Housing Association social rented properties become available a year. Over 50 % of these vacancies are 1-bedroom and sheltered properties.
- Since 2018, 145 homeless prevention tenancies have been set up via Rent Deposit Scheme.
- Private rented sector landlords and letting agencies remain reluctant to let to households in receipt of benefits. The median market rent for a 2-bedroom property was £1350 pcm, 20 per cent higher than the Local Housing Allowance rate of £1100 (equating to a shortfall of over £2,880 per year). However, the average rent for a 2-bedroom property is actually £2069 pcm. This leaves the sector largely inaccessible to households on low incomes or in receipt of benefits.
- Consistently over the last 4 years single homeless people have accounted for over 50% of the Council's homeless approaches.
- In 2020/21 of the 316 homeless approaches 176 were single people, of which 31 were identified as having a history of rough sleeping as a support need.
- Under Everyone-In Epsom & Ewell Borough Council accommodated over 60 single people who were either rough sleeping or at risk of rough sleeping.
- A history of rough sleeping was the 2nd most identified support need for single homeless people. Many of those sleeping rough or with a history of rough sleeping have multiple and complex needs with the predominant factors being poor mental health and substance misuse. Other characteristics are offending, low self-esteem, unemployment, chaotic behaviour, and some are difficult to engage.
- Within the borough there is a limited supply of low-level supported accommodation and there is a significant lack of medium-high level supported accommodation for rough sleepers/single homeless people with multiple and complex needs.

## 9. The Key Objectives for the next five years

In this strategy we have identified six key objectives to meet the needs of our residents who are homeless or at risk of homelessness over the next 5 years. These are outlined in detail below:

These six key objectives are: -

1. The early identification, intervention & prevention of homelessness
2. Reduce Rough Sleeping
3. Increase accommodation options
  - Social Rented Housing
  - Private Rented Accommodation
  - Supported and move-on Accommodation
  - In-borough Temporary Accommodation
4. Improve the Health & Wellbeing of homeless people

5. Ensuring sufficient support is available for homeless people
6. Partnership working

### **Key Objective 1 - The early identification, intervention & prevention of homelessness**

The Homelessness Reduction Act 2017 has put a legal duty on councils to offer more support to a wider range of people who are homeless or threatened with homelessness and to intervene earlier to prevent and relieve homelessness.

Successfully preventing and relieving homelessness has always been and remains the main aim and focus of the Council's Housing Options Service.

Prevention actions include any activities aimed at preventing a household threatened with homelessness from becoming homeless. This would involve activities to enable an applicant to remain in their current home or find alternative accommodation to prevent them from becoming homeless. Relief duties are owed to households who become homeless or are already homeless and require help to secure alternative accommodation.

The Homelessness Reduction Act provides opportunities to build on our preventative and relief work with partner organisations and to identify those at risk of homelessness at a much earlier stage, which will enable us to intervene earlier to prevent homelessness.

#### **Early identification**

Key to the success of this preventative focus is early identification of homelessness. By identifying the specific triggers, risk factors and causes of homelessness at different points in people's lives we will be able to develop a range of interventions specifically targeted at addressing these.

This approach recognises the wider impact of homelessness, particularly in relation to health and wellbeing and will empower individuals and build resilience.

The Council will work with core partners to understand and address the root causes of homelessness within the borough and encourage these organisations to actively seek to identify people at risk of homelessness and to refer people for help at an early stage when support could prevent homelessness.

#### **Early intervention & Prevention**

Preventing homelessness in the first place is a crucial element of this strategy and the Council recognises the importance of early intervention. It is widely accepted that models of homeless service delivery that prioritise prevention are most cost effective and can help more people avoid homelessness in the first place. Early intervention means recognising people at risk of homelessness and taking steps to prevent a setback turning into homelessness.

Early intervention can take the form of advice and information, mediation services; proactive interventions, such as negotiating with landlords to enable people to retain their tenancies; assistance with debt; and targeted services at known risk points, such as those leaving care, hospital, prison or the armed forces.

We want to proactively make residents, communities and organisations aware of the help and support available, rather than just waiting for people to approach us. Increase partnership working and making "Homelessness Everybody's Business", raise awareness of the impact homelessness can have on households and ensure that all agencies know how to appropriately refer households into the Housing Options Service. At the same time it is essential that we look at ways to reduce barriers for people seeking to engage so that it becomes as easy as possible for them to receive the support.

Addressing homelessness from the private rented sector is also critical and we will work with private sector landlords and lettings agents to understand how best to engage with them and to build an early alert system so they contact us if their tenants are at risk of homelessness.

We also want to manage our residents' expectations so that they understand when they approach our services that we are not able to offer many people a social home but can offer a wide range of other services to help

them into a stable home. We also want to communicate the message that addressing homelessness requires the person or household affected and the Council to work together to find a solution.

In addition to providing high-quality advice and assistance we will ensure that there is a wide range of prevention measures, initiatives, and interventions available to tackle homelessness.

Early identification of problems, early targeted interventions and the provision of high-quality advice and assistance will ensure people have the best chance of staying in their home or obtaining alternative accommodation.

#### **What we will do:**

- Review, evaluate and monitor data to predict future trends of Homelessness, identify households at risk of homelessness and to inform new service improvements.
- We will identify the specific triggers, risk factors and causes of homelessness at different points in people's lives. Building on that, we will develop a range of interventions specifically targeted at addressing these.
- Research customer journeys into homelessness to identify early opportunities to prevent their homelessness and any barriers to doing so.
- Housing Services will deliver briefings to colleagues, professionals and elected members to provide up to date information about housing and homelessness to ensure that correct information is disseminated to residents.
- Further develop partnership working with the DWP and local Job Centre plus to strengthen referrals and manage the impact of universal credit
- Encourage early identification and interventions from public sector partners, community and voluntary sector organisations who are able to effectively inform those at risk of homelessness to seek advice from EEBC.
- Review and update housing options information & pathway plans ensuring the customer has access to accurate, useful and comprehensive information about housing options.
- Review & simplify the tasks for PHP's and accompanying advice literature.
- Publicise and promote the Council's prevention services more effectively in an accessible format, and encourage residents to contact us early and before a crisis, ensuring customers know how and where to approach and what to expect from the service.
- Review use of social media and how we communicate our services to the wider general public for example Facebook, twitter, chat pages.
- Devise an early identification & intervention protocol with all Registered Providers to address factors such as arrears, anti-social behaviour and tenancy sustainment.
- Work with Private Sector Landlords and Lettings Agents to develop early signposting protocols for tenants with arrears or other tenancy concerns, to the Housing Options Service, to prevent homelessness.
- Explore a motivational interviewing and resilience approach to the delivery of homelessness services.
- Review the referrals received through Duty to Refer to establish where further work needs to be completed in terms of links and training.
- Identify training needs and delivery training to meet any skill gaps and updates on new legislation and case law.
- Ensure the flexible use of the Council's homelessness prevention fund.

#### **Key Objective 2 - Reduce Rough Sleeping**

The Council's vision to end rough sleeping in the borough adopts the four core principles of the Governments Rough Sleeping Strategy; Prevention (understanding the issues that lead to rough sleeping and providing timely support for those at risk), Intervention (helping those already sleeping rough with swift support tailored to their individual circumstances), Recovery (supporting people in finding a new home and rebuilding their lives) and Systems Support to embed change and monitor progress. Ending rough sleeping means preventing it wherever possible and, where it cannot be prevented, making it a rare, brief, and non-recurrent experience.

Our approach includes identifying people earlier and intervening quickly to offer everyone a route off the streets. Improving the support we offer and enhancing the existing eSOS outreach support for new and

entrenched rough sleepers. We will work with partners to further develop and increase the range of short and long term supported housing solutions available for rough sleepers, including exploring the Housing First model. The Housing First model is about providing a stable home for a rough sleeper and from this point, any other support needs they might have – such as alcohol and drug dependency, physical and/or mental health problems are addressed through coordinated and intensive support.

We will adopt a more flexible approach to working with rough sleepers and will explore the full range of appropriate options. We will continue to work closely with DLUH expert advisers to gain insight into models of good practice and to secure available government funding.

There is a clear link between homelessness and health and wellbeing. The national strategy highlights the importance of the role of health services in tackling rough sleeping because of the high proportion of rough sleepers who suffer from mental ill-health, physical ill-health, addiction issues and the challenges rough sleepers face in accessing mainstream health services. We will also plan to promote the importance of health interventions in tackling rough sleeping and helping a person's recovery.

#### **What we will do:**

- Further develop the Ending Rough Sleeping Delivery plan
- Continue to work with eSOS partners to maintain the provision of effective Outreach Services.
- Deliver SWEP provision annually to prevent rough sleeping during severe weather.
- Provide eSOS assessment beds
- Explore a 'Housing First' model for the most vulnerable homeless applicants.
- Conduct a promotional campaign to the residents of the borough to provide information and awareness on rough sleeping and promote good practice amongst the general public to prevent people becoming entrenched into street life.
- Review accommodation and health support needs of single people with complex needs or challenging behaviours who experience recurring homelessness.
- Develop a No Second Night Out approach to prevent all rough sleeping
- Apply for Rough Sleeper Initiative (RSI) funding to create a new post of Single Person Homeless Support Officer to work solely with Rough Sleepers and single homeless people at risk of rough sleeping
- With our East Surrey Partners apply for Rough Sleeper Initiative (RSI) funding to enhance the ESOS Outreach Service
- Look to implement corporate "sponsorship" of up to 5 people with more complex and longer-term patterns of rough sleeping at requested by DLUHC.

#### **Key Objective 3 - Increase accommodation options**

The inability of households to access affordable housing is recognised in this strategy as one of the main causal factors for homelessness in the borough. The Homelessness Reduction Act alone cannot succeed in tackling homelessness when the underlying causes are mostly concerned with limited supply and affordability. The limited supply of both affordable housing and supported accommodation has not only significantly increased the number of households living in temporary accommodation but also the length of time they spend there before a settled housing solution can be found.

The biggest increase in demand for temporary accommodation is from single adults, often with multiple and complex needs. The majority of single adult households are placed in nightly paid accommodation outside of the borough. This demonstrates a need for the Council to secure more supported and move-on accommodation provision.

Consequently, increasing the range and availability of affordable accommodation options across all sectors is a key priority for the strategy.

The aim is to increase the availability of suitable and affordable housing in both the social rented and the private rented sector and to develop supported and move-on accommodation options for those with multiple and complex needs.

Alongside this we need to ensure the provision of good quality temporary accommodation within the borough so that households are able to maintain their support and social networks and reduce any disruption with getting to their place of employment and their children to school.

### **What we will do:**

#### **Social Rented Housing**

- Address the housing needs of the borough, including affordable housing needs, through the development of our Local Plan
- Review of planning policies to be addressed through Local Plan to deliver more social/affordable, supported and temporary accommodation
- Work with Homes England to identify opportunities for the use of the Affordable Homes Programme 2021 to 2026 to fund Council developments of new affordable housing
- Identify opportunities for the development of social/affordable, supported and temporary accommodation on Council owned sites. List of sites being prepared.
- Purchase residential street properties to provide social/affordable, supported and temporary accommodation
- Explore opportunities for joint working with housing providers to create additional social/affordable, supported and temporary accommodation
- Develop a programme for the dispersal of s106 affordable housing funding to provide additional, social/affordable, supported and temporary accommodation
- Review nomination agreements
- Investigate ways to assist and/or incentivise social housing tenants under occupying larger family homes to downsize

#### **Private Rented Accommodation**

- Review and update Rent Deposit Scheme policy, procedures and scheme documents.
- Introduce rent in advance as a loan
- Set up e-learning pre-tenancy training and life skills to those threatened with homelessness or in temporary accommodation
- Review the current private rented sector (PRS) offer and explore/trial landlord incentives with a view to increasing local PRS opportunities.
- Provide enhanced information and support to customers on how to search for PRS properties to enable them to undertake future searches independently.
- Arrange and co-ordinate an annual Private Sector Landlords forum
- Work across the housing market to maximise opportunities to increase the range of accommodation options for those who are homeless or threatened with homelessness.
- Support and advise private sector landlords to understand the implications of Universal Credit and develop appropriate strategies to encourage PRS landlords to accept customers in receipt of welfare benefits
- Encourage landlords to increase the length of tenancies to provide stability and security to tenants.
- Encourage landlords to offer more affordable rents - closer to LHA rates.
- Facilitate the use of empty properties
- Investigate the feasibility of rent guarantee/ insurance schemes for tenants and landlords

#### **Supported and move-on Accommodation**

- We will review our current provision of supported accommodation and explore the need for specialist supported accommodation for clients that have multiple and complex needs
- Look to increase supported accommodation in partnership with other boroughs/districts, public bodies and Housing Associations.
- Work with local social landlords to investigate developing a trial of a Housing First style approach
- Work with Transform Housing & Support to deliver 4 units of supported move- on accommodation for Rough Sleepers, funded through Rough Sleeper Accommodation Program (RSAP) and the Homes England Move-On Fund.



### **In-borough Temporary Accommodation**

- Review the supply of temporary accommodation and identify future local temporary accommodation needs and how these can be best met.
- Review and update the temporary accommodation procurement plan
- Review and update the temporary accommodation placement policy.
- Increase the number of private sector leasing scheme properties
- Work with Sanctuary Housing to develop up to 14 units of in-borough temporary accommodation at Defoe Court.

### **Key Objective 4 - Improve the Health & Wellbeing of homeless people**

In 2019, the Council agreed the Borough's Health & Wellbeing strategy. The strategy identified 5 key priorities for the borough, with a focus on the health and wellbeing inequalities experienced by those residents who are more vulnerable due to their life circumstance. The strategy highlighted that poor health and wellbeing outcomes can be the direct result of the wider determinants of health (such as social and economic status or living environment). An individual who is homeless is significantly more likely to experience poor physical and mental health, as a direct result of having in-secure housing, or no address. This is both situational in respect of not being able to register at the necessary health services, and circumstantial in respect of a significant shift in prioritisation; trying to secure the finances to survive, as opposed to being able to engage in behaviours that help them thrive.

It is widely understood that those experiencing homelessness are also 80% more likely to have mental health problems, and that this is may be further compounded by other factors such substance misuse, poverty/debt, domestic abuse, learning difficulties, employment prospects, and poor physical health. In recognition that these factors persist upon the prevention or resolution of homelessness, the Council will seek to work with statutory and voluntary services to ensure that the opportunities afforded to those at risk of homelessness are met. In the absence of such, determinants such as poverty/debt will continue to adversely impact on an individual's ability to engage in positive health behaviours. Supporting our homeless population remains a key priority for the Council and we will promote the importance of health interventions in helping a homeless person's recovery.

#### **What we will do:**

- Develop a make every contact matter ethos across the service and with partners.
- Work with applicants to build on their own skills and strengths to develop their resilience and self-sufficiency.
- Work closely with the SCC Public Health and Health Services to improve the health and wellbeing of vulnerable homeless people, especially those with multiple & complex needs through the work of the Surrey Homeless Multi-Agency Group (MAG).
- Work in partnership with Surrey Adults Matter (SAM) to focus on delivering better coordinated services to improve the lives of adults facing Severe Multiple Disadvantage
- Work closely with SCC Public Health/SAM to pilot the "Bridge the Gap" trauma informed Outreach Support Service.

### **Key Objective 5 - Ensuring sufficient support is available for homeless people**

Epsom & Ewell recognises that for some households homelessness cannot be tackled, or prevented, solely through the provision of accommodation. Some households will require a range of support services to help them sustain their accommodation as well as personal support relating to factors such as relationship breakdown, domestic abuse, mental health problems, drug and alcohol addiction, offending, poverty, debt and unemployment.

One of the key areas of focus in the Homelessness Reduction Act 2017 is that the support needs of applicants are assessed and personalised housing plans are made to meet any support needs identified. The Act also

requires that the housing advice given is tailored to the needs of specific vulnerable groups. Groups specifically mentioned are: those leaving prison or youth detention; care leavers; former members of the armed forces; people leaving hospital; people experiencing domestic abuse; and those suffering from mental illness.

The Council wants to work with our partners to improve the support available to households who are homeless or could be at risk of becoming homeless in the future. Providing the right support is important in helping homeless households recover from the effects of homelessness and will help build resilience.

#### **What we will do:**

- Ensure there is a clear documented housing pathway for groups who need specialist support, including each of the specified groups.
- Review the internal and external support services provided and explore opportunities to provide a more targeted and efficient service, particularly to those with complex needs to intervene early to prevent recurring homelessness.
- Continue to fund and work with our East Surrey partners and Thames Reach to provide a specialist outreach support services for rough sleepers.
- Continue to support those households to access employment, education and training through continuing to fund ETHOS and through working with the Employment Hub.
- Ensure that homeless households have the skills required to maintain a tenancy.
- Continue to work with tenancy sustainment and floating support services to ensure that those households placed in temporary accommodation are receiving appropriate support and assistance.
- Review our current provision of supported accommodation and explore the need for specialist supported accommodation for clients that have multiple and complex needs.
- Proactively work with households in temporary accommodation to identify and secure suitable alternative accommodation and ensure that each household has a move on plan.
- For some homeless households there are issues that prevent move on from temporary accommodation. There are a variety of reasons for this which include; the benefit cap, history of rent arrears, anti-social behaviour, offending, complex health issues and other risk issues that make both social and private landlords reluctant to accept them as tenants. We will identify these issues and put in place measures to try to address them.
- Continue to support homeless household to find and secure private rented accommodation through the Council's Rent Deposit Scheme.
- Offer tenancy support and sustainment to households who are assisted to access private rented accommodation via the Council's Rent Deposit Scheme.
- Continue to support individuals and families that experience domestic abuse.
- Continue to fund the Sanctuary Scheme to help victims of domestic abuse to safely remain in their homes.
- Identify support needs at an early stage and refer to appropriate services (drug/alcohol, mental health, young persons, domestic abuse, ex-offenders, money advice, employment support, floating support, foodbank, CAB).
- Promote resilience and support to those who are or used to be homeless, to improve their resilience and reduce the risk of them from becoming homeless again.
- Work with Children's Services and the Family Support team to identify families who need some additional help beyond accommodation needs and ensure arrangements are in place to refer households with children to Early Help/Family Support as early as possible
- Work with partners to identify tenants at risk of "cuckooing" and ensure rapid interventions are in place to support them.
- Work with partners to support Surrey Adult Matter (MEAM) and the "Bridge the Gap" trauma informed Outreach Support Service for homeless people
- Make referrals to furniture projects to ensure that homeless households have a furniture offer when moving into new accommodation.

#### **Key Objective 6 - Partnership working - Preventing homelessness is everybody's business**

It is widely recognised that no single organisation can prevent or relieve homelessness. All partners have a role to play in preventing homelessness and addressing the underlying issues that are the root causes of

homelessness such as poverty, unemployment, poor physical and mental health, and family breakdown. "Preventing homelessness is everybody's business".

Addressing the underlying causes of homelessness and working closely with relevant partners is pivotal to the success of this strategy. The Housing Options Service has well established partner relationships with core agencies within the borough however it is a priority for this strategy that these relationships continue to develop and strengthen in order to ensure the borough is best equipped to deal with the changing pressures of homelessness.

Our Homelessness and Rough Sleeping Strategy sets out how we will work with our partners across all sectors to develop an integrated approach to tackling homelessness and rough sleeping. This will include both statutory and non-statutory stakeholders and include the private sector and those with lived experience of homelessness.

Only by working together can we effectively tackle homelessness and rough sleeping. By working together, we can improve services and interventions that support people when they are most in need and deliver better outcomes for them.

#### **What we will do:**

- Increase partnership working and make "homelessness everybody's business", raise awareness of the impact homelessness can have on households and ensure that all agencies know how to appropriately refer households into the Housing Options Service.
- Host an annual Homelessness forum with partner agencies.
- Host an annual Registered Provider Forum with a focus upon support for tenants at risk of homelessness.
- Host an annual Private Landlord's Forum to increase the availability of private rented accommodation in the borough and to encourage good practice. We will address the gap between Local Housing Allowance (LHA) and private sector rents by building relationships with landlords to increase the supply of affordable rented accommodation in the borough
- Work in partnership to ensure appropriate multi-agency joint working and referral arrangements are in place for Housing Options Service and to explore how preventative services can be developed and improved.
- Promote more joined up working with, health, prison and probation services to prevent homelessness on discharge or release from an institution.
- Work closely with SCC Public Health and the Health Service to improve the health and wellbeing of vulnerable homeless people, especially those with multiple & complex needs through the work of the Surrey Homeless Multi-Agency Group (MAG).
- Further develop partnership working with the DWP and local Jobcentre plus to ensure the Housing Options Service has access to information and receive regular updates, including training on UC and other benefits.
- Maximise funding opportunities through partnership working to identify and bid for new initiatives, building upon recent successes (e.g. MEAM, Housing First, RSI, Next Steps and RSAP).
- Work with partners to identify how those with lived experience of homelessness can be included in the design and delivery of services.
- Campaign and raise awareness of issues of homelessness that are linked to affordability and to LHA rates and the Benefit Cap.
- Work with our Surrey partners in implementing the Domestic Abuse Act
- Work with our Surrey partners and Children Services in reviewing and implementing the Joint Housing Protocol for 16 & 17 year olds & the Care Leavers Protocol
- Work closely with our Surrey partners and Health Services to review and implement the Mental Health Protocol and the Hospital Discharge Protocol.

#### **10. Consultation**

In drafting the Homelessness and Rough Sleeping Strategy we will undertake consultation with our staff and residents; service users; local support services; the voluntary sector and housing providers. The consultation will be in the form of focus groups and on-line questionnaires.

## **11. Resourcing the Strategy**

Many of the actions within the Action plan are administrative and procedural and will involve officer time. These will be prioritised and spread over the 5-year life span of the strategy.

Currently the Council receives Department of Levelling Up, Housing and Communities (DLUHC) (formally MHCLG)) annual Homelessness Prevention Grant. This grant has been confirmed for 2022/23. This grant is used to pay for the temporary accommodation management fee with our RSL temporary accommodations providers, some staffing costs and some homeless prevention measures such as the Rent Deposit Scheme.

We will develop a programme for the dispersal of s106 affordable housing funding to provide additional social/affordable, supported and temporary accommodation.

We will ensure that we apply for any further funding bids the Government launch that are appropriate to meeting the needs of our borough. We will also explore other funding streams with partners where appropriate.

## **12. Monitoring and Review**

The multi-agency Homelessness Forum will meet annually to review the Action Plan, monitor progress towards meeting the aims of the new strategy and to develop ideas for future action.

Responsibility for driving through this strategy and ensuring that it delivers key objectives lies with the Council's Strategic Housing Manager.

## **13. The Action Plan**

Delivery of the Strategy will be supported by an action plan, which sets out the individual actions and activities to be undertaken and details how the Council will achieve the aims and objectives of the strategy. This Action Plan is set out in appendix 2.

## **14. Equality Impact Assessment**

*(To be completed following consultation)*

## **15. Publication**

A copy of this Strategy is available on the Council's website and is available on request at the Council's offices. A paper copy can also be provided upon request.

A copy can be made available in a different language, large print and braille on request.

## **16. Appendices**

Appendix 2 - Homelessness & Rough Sleeping Strategy Action Plan – Consultation Draft

Appendix 3 - Homelessness Review 2022– Consultation Draft