

HOMELESSNESS AND ROUGH SLEEPING STRATEGY

Cabinet Member & Portfolio	Cllr Steve Tuckwell, Cabinet Member for Planning, Housing and Growth
Responsible Officer	Dan Kennedy, Corporate Director, Residents Services
Report Author & Directorate	Debby Weller, Residents Services
Papers with report	Appendix 1 – Hillingdon Homelessness and Rough Sleeping Strategy 2026 to 2030 Appendix 2 – Homelessness and Rough Sleeping Review Appendix 3 – Consultation Report Appendix 4 – Equality Impact Assessment

HEADLINES

Summary	Following the conclusion of a six-week consultation, this report presents the results of the consultation, the Homelessness Review, Equality Impact Assessment and the revised Homelessness and Rough Sleeping Strategy for formal adoption.
Putting our Residents First Delivering on the Council Strategy 2022-2026	This report supports our ambition for residents / the Council of: Live in good quality, affordable homes in connected communities This report supports our commitments to residents of: Thriving, Healthy Households The Homelessness and Rough Sleeping Strategy will complement the wider Housing Strategy and the Health and Wellbeing Strategy and will contribute to the delivery of the Council’s Medium Term Financial Strategy.
Financial Cost	There are no direct financial costs in the updating and revision of the Homelessness and Rough Sleeping Strategy
Select Committee	Residents’ Services Select Committee
Ward(s)	N/A

RECOMMENDATIONS

That the Cabinet:

- 1) **Duly note the outcome of the Homelessness Strategy consultation and the Equality Impact Assessment;**
- 2) **Approve the Homelessness and Rough Sleeping Review and Homelessness and Rough Sleeping Strategy as appended to this report;**
- 3) **Agree that a progress update will be provided to Cabinet on an annual basis.**

Reasons for recommendation(s)

The Council has a statutory duty to produce and publish a strategy to tackle and prevent homelessness based on a review of all forms of homelessness in the borough.

A six-week consultation was undertaken in relation to the draft strategy and the outcome of that consultation along with an equalities impact assessment is presented to Cabinet for consideration. Based on this and other information set out in this report, it is recommended that the Strategy be approved.

Alternative options considered / risk management

No alternative option has been considered. The Homelessness Act 2002 places a statutory obligation on Hillingdon Council to produce a strategy to address homelessness at least once every five years.

Select Committee comments

The Select Committee have previously undertaken a major review into Homeless Prevention and the Customer Journey which was approved by [Cabinet on 26 June 2025](#).

Additionally, on 18 February 2026, the Select Committee considered the Homelessness Review and the draft Homelessness and Rough Sleeping Strategy. Members sought reassurance around demand modelling for asylum seekers, new arrivals and Chagossian households, noting continued service pressures. Councillors welcomed the use of trend data but highlighted the volatility of demand and the need for resilient financial planning. Members also requested clearer transparency where cost pressures were included in the published budget but not broken down by cohort.

Councillors queried the use and impact of Discretionary Housing Payments, welcoming confirmation that the full budget is spent annually, while noting this may indicate unmet need. Members also highlighted the scale of temporary accommodation pressures, with forecast gross expenditure of around £35 million and net costs of £19.5 million, emphasising prevention as critical to long-term cost control.

Councillors raised concerns about potential changes to London-wide temporary accommodation

data sharing, stressing the importance of benchmarking performance across boroughs. Members also welcomed the development of the new homelessness dashboard aligned to national targets and Medium Term Financial Strategy priorities but emphasised that appropriate access for scrutiny would be essential.

Members requested stronger outcome data on repeat rough sleeping and welcomed sustained placements for entrenched cases, while noting growing complexity, particularly around mental health and dual diagnosis. Councillors encouraged clearer evidence-based wording in the Strategy where supporting data exists.

Councillors welcomed the near-exclusive use of self-contained temporary accommodation and strengthened partnership working with Heathrow Airport. Members also welcomed reassurance that the Council works closely with charities and voluntary organisations, particularly those supporting veterans, and liaises with relevant third parties to ensure coordinated support in complex cases.

Members recommended that the Strategy include more detail on the impact of rough sleeping and homelessness near residential dwellings, particularly where this can contribute to antisocial behaviour or wider community concerns. Councillors stressed the importance of clearer communication with residents, setting out how they can raise concerns, how they can feed into local solutions, and what enforcement powers the Council can and cannot use. Members also requested further clarity on delivery against the commitment to 500 homes within the Strategy.

Members recommended the addition of the word 'empathy' to the list of values adopted by Hillingdon Council as set out in the draft Strategy.

SUPPORTING INFORMATION

Background

1. The Homelessness Act 2002 requires that housing authorities publish a Homelessness Strategy based on a review of homelessness in their district every five years or more frequently if circumstances in the area change.
2. During 2025, a wide range of internal and external partners were engaged and an extensive range of data was collated to inform the review. This also took on board findings from the Residents' Services Select Committee Review relating to Homelessness Prevention and the Customer Journey the recommendations from which were accepted by Cabinet in June 2025.
3. A draft strategy has been developed based on the findings of the homelessness review and has been the subject to a formal consultation process initially from 5 January 2026 to 15 February 2026 and extended to allow for an additional workshop with Adult Social Care and Public Health colleagues on 17 February 2026. The draft documents were also presented to Residents' Services Select Committee on 18 February 2026.
4. There have been considerable changes affecting homelessness since our last Homelessness Strategy was published. The Covid 19 pandemic changed the landscape quite radically. Prior to this, there had been for some time 100 to 150 people at Heathrow Airport. They were all

relocated to hotels under the 'Everyone In' initiative. Since this time, arrangements have continued between security at the airport and outreach services to ensure that rough sleeping at the airport remains at a much lower level. The last formal rough sleeper count in November 2025 recorded 13 rough sleepers at the airport. The period during and following the pandemic also saw considerable development of the rough sleeper pathway in Hillingdon, including use of Olympic House, 33 bed first stage accommodation, and enhanced outreach services, additional floating support and drug and alcohol services. Much of this has been supported by grant funding which is now being brought together in the overall Homelessness Prevention and Rough Sleeping Grant.

5. Key themes highlighted in the homelessness review include:

- Prioritising prevention.
- Integrating employment support with housing services.
- Needs of specific groups, including those aged under 35, benefit capped households.
- Asylum seeker pressures.
- Improved partnering, including with landlords.
- Providing realistic information on housing options.
- Learning from complaints and instituting a structured approach to gathering feedback.
- Promoting staff wellbeing and preventing burnout.
- Increasing accommodation options and addressing concerns regarding accommodation quality and anti-social behaviour.

Current context

6. During 2024/25, there were 7,306 approaches to the Council regarding homelessness. The top three reasons were: private rented sector (PRS) evictions (1,720), family or friend evictions (1,699) and domestic abuse (434). The approaches were a 47% increase on the previous year. Approach numbers this year are forecast to be similar to 2024/25.
7. At the end of January 2026, there were 1,631 households in temporary accommodation, of which 864 were nightly paid bookings. The number, cost and quality of temporary accommodation bookings is a considerable cause for concern and a risk for the Council. A separate Temporary Accommodation (TA) Strategy was approved by Cabinet in February 2025 and quarterly monitoring reports are in place. The priorities in the TA Strategy are being taken forward via components in the Medium Term Financial Strategy and are reflected in the new Homelessness Strategy. It is proposed that further monitoring of the TA Strategy be included as part of the overall monitoring arrangements for the Homelessness Strategy.
8. Current challenges for the Homelessness Strategy include:
- Sharp increases in rough sleeping, especially in-borough as opposed to the airport.
 - Growing numbers of rough sleepers with complex needs.
 - Escalating TA costs and financial pressures.
 - Increased rental costs and growing gap between rent and Local Housing Allowance impacting affordability.
 - Realignment of PRS housing with many small landlords exiting the market.
 - Use of hotels for asylum seekers and home office reducing backlog transferring responsibility to the Council. 7 to 28 day notice periods are insufficient.

- Realistic housing options include PRS out of borough, but reluctance and misunderstanding around relocation.
 - Increase in refugee linked rough sleeping.
 - Delivery challenges for new supply linked to cost inflation, regulatory requirement and competing priorities.
9. The **National Plan to End Homeless** was published by MHCLG on 11 December 2025. The Plan has the following five key themes:
- Immediate action to end use of B&Bs for families and improve temporary accommodation.
 - Medium-term change to support councils and publish services from crisis to prevention.
 - Long-term sustainable change to address the root causes of homelessness.
 - Halving the number of people experiencing long-term rough sleeping
 - Underpinned by transformed accountability
10. Increased accountability includes a requirement that local housing authorities publish annual action plans to support the delivery of homelessness strategies. They are a condition of grant funding and the first action plan must be in place by Autumn 2026.
11. The plan will need to include targets against each of the metrics in the Outcomes Framework, and a description of how, working with partners, those targets will be achieved. The relevant metrics are:
- Households with children in temporary accommodation (Rate per 1,000 households)
 - Families in non-self-contained B&B over 6 weeks (Number of households)
 - Success at prevention or relief (Percentage of all duties owed)
 - Success at prevention or relief for those with three or more support needs (Percentage of all duties owed)
 - People sleeping rough on a single night (Number of people)
 - People sleeping rough over the month who are long-term (Number of people)
12. The plan must also set out governance structures that will hold the authority and partners accountable; it must include a plan for ensuring suitability of temporary accommodation and a long-term rough sleeping partnership plan will be required.
13. The **Renters' Rights Act** received Royal Assent on 27 October 2025 and brings major reforms to the private rented sector. Enhanced enforcement powers have been in place since December 2025 and the new tenancy regime for the PRS will be in force from May 2026. This will include:
- Abolishing section 21 'no-fault' evictions.
 - Introducing Assured Periodic Tenancies.
 - Reform of possession grounds.
 - Limiting rent increases to once a year.
 - Banning rental bidding and rent in advance.
 - Making it illegal to discriminate against renters who have children or receive benefits.
 - Requiring landlords in the PRS to consider tenant requests to rent with a pet.
 - Strengthening local council enforcement and rent repayment orders.

14. The second phase, the rollout of the landlords database and the introduction of the ombudsman will begin late 2026. A third phase to implement Awaab’s Law in the PRS and Implement the Decent Homes Standard has a longer time frame well into the 2030s.
15. Implementation of the **Supported Housing (Regulatory Oversight) Act** will begin with a comprehensive needs assessment and development of a Supported Housing Strategy, to be in place by the end of March 2027. The Act has been brought in to tackle rogue providers and establish a regulatory baseline and expectations for the sector. The strategies require collaboration with partners to understand the local landscape of supported housing, including supply, unmet need and future demand, and to develop a strategy which set out the direction of travel to meet identified needs. This will include supported housing for homelessness and related issues requiring support as well as a wide range of other types of supported housing. First annual management reporting will also be required Spring 2027. A licensing regime and national supported housing compliance standards are expected to go live Spring/Summer 2027.
16. The new **Social and Affordable Homes Programme (SAHP) 2026-2036** includes up to £11.7bn in London for projects on site by March 2036. Bidding opens from 24 February 2026. At least 60% of homes under the programme are expected to be social rent.

Hillingdon Homelessness and Rough Sleeping Strategy 2026 to 2030

17. The Strategy sets out a vision for Homelessness and Rough Sleeping:

“Putting residents first: a compassionate, preventative and empowering approach to tackling homelessness and rough sleeping, with access to appropriate accommodation and support.”

18. The Strategic Priorities, goals and key actions are summarised below:

Strategic Priority 1: Resident Focused Homelessness Services		
Goal 1: Residents are Clear about their Rights and Responsibilities and are Respected, Understood and Supported	Goal 2: Staff are Equipped to Provide Excellent Services	Goal 3: Strengthening Partnerships
<ul style="list-style-type: none"> Residents’ Charter to explain homelessness support and set expectations Providing a welcoming environment Efficient appointment systems Quality assurance controls 	<ul style="list-style-type: none"> Training and development Supervision and Wellbeing - staff supervision and tools and policies to support mental health Learning culture, share good practice and 	<ul style="list-style-type: none"> Recognise and value contributions Shared protocols and integrated systems Referrals across departments Engage actively with partners Coordinate activities Forward planning work with partners



<ul style="list-style-type: none"> • Feedback mechanisms to inform service improvements and promote co-production • Strengthening complaints process and learning to improve services • Update communication materials to ensure clarity and understanding 	<p>promote continuous improvement</p> <ul style="list-style-type: none"> • Professionalism and consistency – clear service standards and protocols • Effective case management with named case workers and active communication • Staff voice – involved in service design 	<ul style="list-style-type: none"> • Longer-term commissioning • Shared learning and development
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Strategic Priority 2: Early and Sustained Prevention of Homelessness		
Goal 1: Improve Access to Early and Sustained Prevention of Homelessness	Goal 2: Strengthen Financial and Multi-Agency Support to Prevent Homelessness	Goal 3: Support Tenancy sustainment and Long-Term Housing Stability
<ul style="list-style-type: none"> • Universal advice • Targeted advice to be expanded for high-risk groups • Tailored response to high volume presentations • Readiness for Renters Rights legislation • Digital tools for self-assessment and tailored advice • Joint working with Children’s Services to improve pathways for care experienced young people 	<ul style="list-style-type: none"> • Homelessness Prevention Fund • Coordinate wraparound support through range of homelessness partners • Hospital discharge protocol • Prison and probation services strengthened protocol 	<ul style="list-style-type: none"> • Floating support and tenancy management through partners and inhouse services • Employment and financial advice to support long-term stability • Discretionary Housing Payments kept under review to support households at risk • Preparation for Independent Living

Strategic Priority 3: Support Access to Safe, Suitable, Sustainable Accommodation		
Goal 1; Increase Access to Safe, Suitable and Sustainable Accommodation	Reduce Reliance on Emergency Housing	Improve Pathways to Settled Housing
<ul style="list-style-type: none"> • Develop homelessness accommodation pipeline • Maximise use of Council owned assets 	<ul style="list-style-type: none"> • Increase supply of temporary and supported housing 	<ul style="list-style-type: none"> • Secure move-on options through collaboration with providers

<ul style="list-style-type: none"> • Address Homes in Multiple Occupation quality and regulation through licensing and inspections • Maximise use of existing Council homes 	<ul style="list-style-type: none"> • Continue to develop relationships with private landlords • Strengthen partnerships with housing associations and larger private sector providers 	<ul style="list-style-type: none"> • Promote tenancy sustainment and support services • Monitor and evaluate transition outcomes to inform future planning
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Strategic Priority 4: Targeted Housing Pathways for Single Homeless, Rough Sleepers and Other Groups		
Goal 1: Build Clear and Sustainable Housing Pathways	Goal 2: Strengthen Partnership and Outreach to Address Complex Needs	Goal 3: Promote Recovery, Independence and Long-Term stability
<ul style="list-style-type: none"> • Robust Pathways to effectively support movement to sustainable accommodation • Pathways for recent arrivals • Increase availability of shared accommodation for under 35s • Targeted supported housing for young people • Safe Temporary Accommodation for survivors of Domestic Abuse • Combined housing and employment advice for those who are benefit capped • Dedicated officer working with hospital discharge teams 	<ul style="list-style-type: none"> • Partnership working with other London Boroughs to address rough sleeping • Collaboration with commissioned and non-commissioned services to help transition away from the streets • Outreach services to be reviewed to ensure remain responsive to evolving needs 	<ul style="list-style-type: none"> • Focus on health and wellbeing and on access to meaningful opportunities in education, training and employment • Tailored support to transition to independent living • Housing first initiatives to provide a solid foundation to address deep rooted challenges

Strategic Priority 5: Modern data led cost effective services	
Goal 1: Use Data to Drive Prevention and Early Intervention	Goal 2: Embed Performance, Workforce and Service Quality Monitoring
<ul style="list-style-type: none"> • Centralised Homelessness Dashboard – provide real-time visibility of key metrics to support operational oversight, strategic planning and performance management 	<ul style="list-style-type: none"> • Benchmarking against other London boroughs and national indicators (outcomes framework) • Monitoring of staff caseloads and wellbeing indicators

<ul style="list-style-type: none"> • Predictive analytics to identify households at risk of homelessness earlier • Data modelling to support resource allocation, forecast demand and inform commissioning decisions 	<ul style="list-style-type: none"> • Key metrics to include re-approach rates, resolution times and resident satisfaction
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Consultation

19. The draft strategy has undergone a 6-week consultation process involving a wide range of staff, partner organisations and Hillingdon residents, including some with lived experience of homelessness and rough sleeping. The survey methodology included an online survey, use of social media to promote the survey, workshops with staff and partners and a homelessness forum. Full details of the consultation are included in Appendix 3 and a short summary is provided below.

20. A total of 52 survey responses were received alongside extensive qualitative feedback from staff partners and residents. Overall, residents showed majority support for all five strategic priorities, with particularly strong endorsement for:

- Priority 3 – Access to safe, suitable and sustainable accommodation: 75% agreed or strongly agreed, making it the most supported priority.
- Priority 2 – Resident focused homelessness service (now reordered as priority 1 in the revised draft): 71% agreed or strongly agreed.
- Priority 1 – Prevention (now reordered as priority 2 in the revised draft): 62% agreed or strongly agreed.

21. Support was slightly lower for:

- Priority 4 – Targeted pathways for single homeless and rough sleepers: Agreement and disagreement were more balanced, reflecting mixed views.
- Priority 5 – Modern, data-led and cost-effective services: 58% felt the priority aligned with their expectations

22. Overall, the consultation shows:

- Broad support for the direction of the strategy.
- Strongly articulated concerns about temporary accommodation pressures, system coordination, fairness and communication.
- A clear need for enhanced multi-agency working, data-led improvement, and more proactive, preventative pathways.
- Community and partner anxiety about national policy pressures – particularly migration and private rented sector instability – and their impact on local services.

Amendments following consultation

23. The findings of the consultation have been fully considered and appropriate changes have been incorporated. A revised strategy is attached at Appendix 1 with alterations from the consultation draft adopted in the final version. These include:

- Additional information has been included in the 'Context' chapter regarding the National Plan to End homelessness including relevant local metrics that will be required for the Outcomes Framework.
- Specific Key Performance Targets have been added for each of the five priorities.
- The order of priorities 1 and 2 have been reversed. 'Resident focussed homelessness services' is now Priority 1. Although all priorities carry equal weight, this is more in keeping with the Council's overall vision of 'Putting Residents First'.
- Adopting an empathetic approach has been added to Priority 1: Resident focused homelessness Services and the following additional actions have been included:
 - Communications: We will review how we communicate with our residents to provide increased clarity in how homelessness services are delivered.
 - Compassionate Response: All staff engaging with homeless or potentially homeless households will receive training in trauma-informed and empathetic communication, enabling them to recognise vulnerability, reduce stigma, and provide a respectful, person-centred service at every point of contact.
 - Triage: Strengthen triage and follow up processes to minimise repeat presentations and prevent premature case closure.
 - Duty to Refer: Use the process to maintain engagement with referral agencies for longer periods of time.
- The following additional actions have been included under Priority 3: Support Access to Safe, Suitable, Sustainable Accommodation:
 - Develop an assurance framework for safety compliance and standards of housing provided across housing tenures and including temporary housing.
 - Review and update the existing policy for temporary accommodation and private rented sector offers.
 - Engage with landlords to share understanding regarding responsibilities under Renters' Rights Act and opportunities that this may bring for greater partnering.
- The following additional actions have been included under Priority 4: Targeted housing pathways for single homeless, rough sleepers and other groups
 - Public health related housing need: Consider provision to meet the particular needs of some individuals where shared accommodation may not be appropriate e.g., those under treatment for tuberculosis or where there are specific high-risk needs making shared schemes untenable.
 - Community Impact: Provide clear information to residents on how to report concerns, engage in local solutions, and understand the Council's enforcement powers in areas affected by rough sleeping or antisocial behaviour.
- A reference has been made to over-representation of people from the LGBTQ+ community and those who are neuro-divergent amongst rough sleepers. The following additional action has been included under Priority 5: Modern data led cost effective services.
 - Data Collection Analysis: A comprehensive review of data sources and collection methods, including from partner organisations, will be undertaken. This will incorporate equalities data.

Equality Impact Assessment

24. An Equality Impact Assessment has been completed and is attached at Appendix 4. This concludes that the strategy will have positive impacts for all groups of households. The

consultation results show differences in the extent to which respondents agree with the priorities in the strategy; but overall, the strategy is strongly supported by most respondents. This is particularly so for older adults, women, and global majority ethnic groups. The impact of the strategy on those with protected characteristics will be monitored annually.

Financial Implications

The General Fund budget for the Homelessness Prevention & Lettings service meets the costs of the Council's statutory duties in this area, and has a budgeted gross cost of £19,206k in 2025/26. A £6,854k temporary accommodation (TA) pressure was reported against client groups included in the MTFs TA model (General Needs, Rough Sleepers and other cohorts) in M9- 2025-26. The risk of further overspend in 2025/26 against homelessness costs remains high given the rising levels of homeless presentations and the challenges in securing suitable alternative accommodation to prevent homelessness, particularly in the private rented sector.

Budget Proposals for 2026/27 recognised the exceptionally challenging environment in which the budget has been prepared. Members highlighted the significant financial pressures arising from national asylum and resettlement responsibilities, including costs associated with asylum presentations and the Chagos Islander settlement, for which the Council is not fully or sustainably reimbursed. These externally driven pressures continue to place a disproportionate burden on Residents' Services, particularly housing and temporary accommodation.

It is noted that a proposed net increase of approximately £15.8m within Residents' Services is driven largely by unavoidable demand pressures, particularly homelessness. The scale of the challenge due to continued focus on controlling temporary accommodation costs, securing private rented sector supply and increasing the provision of social rented homes has been taken into consideration in setting the 2026/27 budget. The emphasis on prevention, move-on pathways and partnership working has been welcomed, while recognising that many drivers of demand remain outside the Council's control.

The Government announced the draft Local Government finance settlement figures on 17 December 2025, the data from which was built into the Council's consultation budget issued to the December Cabinet and published on 23 December 2025. On 9 February 2026, the Government released the final Local Government settlement.

In the final settlement, the additional funding to the Council came through as an increase to the Homelessness and Rough Sleeping grants and the total for those two grants amounted to £18.4m over a period of three years from 2026/27 to 2028/29.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities

The Homelessness and Rough Sleeping Strategy has a direct bearing on the Council's vision of 'Putting Our Residents First'. It sets out plans for the prevention of homelessness and rough sleeping, and for securing accommodation and support for those who are homeless or at risk of homelessness.

An Equalities Impact Assessment (see Appendix 4) has been completed and concludes that the strategy will have a positive impact for all groups of households through actions to prevent homelessness and increase accommodation supply.

Consultation & Engagement carried out

The strategy has been subject to a wide-ranging consultation process with staff, partner organisations and residents. This is summarised in the body of this report and fully detailed in a consultation report at Appendix 3.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concur with the Financial Implications set out above, noting the recommendations to approve the adoption of the Homelessness and Rough Sleeping Strategy 2026-2030, alongside the associated Homelessness and Rough Sleeping Review.

Furthermore, it is noted there is no direct financial impact in relation to the recommendations contained within the report, however, the Strategy is intended to support the mitigation of future cost pressures on temporary accommodation where demand remains volatile due to external factors. As at Month 9 the Temporary Accommodation service were reporting an adverse variance of £6,854k, with this being a national pressure, but with Hillingdon particularly impacted by having Heathrow within its boundaries having a material impact on supply and demand.

The consultation reaffirmed the significant operational and financial pressures arising from sustained temporary accommodation demand and the importance of strengthened prevention, improved triage and clearer performance management to support more effective control of demand. The Strategy has therefore been updated to reflect this feedback, including strengthened resident-focused practice, enhanced communication processes and improved actions around accommodation standards and landlord engagement, which are expected to support longer-term cost mitigation.

The Council's budget strategy approved in February 2026, contains an increase in the budget strategy effectively aiming to fund the additional growth currently in the system along with forecasted demand. The demand, cost and measures contained within this strategy will be monitored through the demand led financial and activity-based model as part of the established Monthly Monitoring Cycle and will inform the wider future MTFS refresh.

Legal

Legal Services confirm that pursuant to sections 1-3 of the Homelessness Act 2002, the Council must also ensure that it publishes a new homelessness strategy every 5 years after a formal review. The Council's previous homelessness strategy covered the period 2019 to 2024, thus a new strategy was due. The review and recommended strategy are included at Appendices 1 and 2 respectively.

The Council has various duties under Part VII of the Housing Act 1996 towards applicants who are homeless or threatened with homelessness. Under the Homeless Reduction Act 2017, the Council is further required to intervene and prevent homelessness. The Council must also have regard to the Ministry of Housing, Communities and Local Government's ['Homelessness code of guidance for local authorities'](#) (last updated 4 December 2025). The recommended strategy addresses how the Council intends to deliver its homelessness functions. The body of this report also addresses recent legislative reforms that address homelessness, such as the Renters' Rights Act and the Supported Housing (Regulatory Oversight) Act, and how these have informed the recommended strategy.

Section 3 of the Homelessness Act 2002 addresses the content of a homelessness strategy and what the Council must have regard to when formulating it. It requires the Council to consult such public or local authorities, voluntary organisations or other persons as they consider appropriate hence the consultation exercise addressed in this report and in further detail in Appendix 3. For a consultation to be lawful, it must fulfil the established public law principles on consultation, namely fairness and adequacy, which are mainly defined by the 4 *Gunning* principles:

- a. Consultations must occur while proposals are still at a formative stage
- b. Sufficient information needs to be supplied to consultees to give the consultation 'intelligent consideration'
- c. There needs to be an adequate time for the consultees to consider the proposal and respond
- d. Conscientious consideration must be given to the consultation responses before decisions are made

In particular, the decision maker, when deciding whether to approve the recommended strategy for adoption, must be satisfied that all consultation responses have been considered. This report addresses how the proposed strategy has been amended following the consultation.

In carrying out its homelessness functions, the Council, pursuant to section 6 of the Human Rights Act 1998, must not act in a way that is contrary to any rights protected by the European Convention of Human Rights. The Council must also ensure it is acting in a manner compliant with the public sector equality duty under section 149 of the Equality Act 2010. To this end, an equality impact assessment has been conducted and is included at Appendix 4. The public sector equality duty is an ongoing duty, so the Council must continuously monitor the position.

BACKGROUND PAPERS

- Report from Resident Services' Select Committee – Homeless Prevention and the Customer Journey, [Cabinet 26 June 2025](#), Agenda item 6
- [Minutes of the Residents' Services Select Committee 18 February 2026](#)
- [Homelessness Act 2002](#)