

Cabinet

22 September 2026

Temporary Accommodation Placement and Suitability Policy

Portfolio Holder: Councillor Louwella Prenter, Portfolio Holder for Housing and Homelessness

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Summary

The report requests that the Cabinet adopts the Temporary Accommodation Placement and Suitability Policy. The policy itself will provide transparency and structure to the way that the Council provides temporary accommodation with a view to ensuring compliance and minimising legal challenge.

1. Recommendation

- 1.1. The Cabinet is asked to agree to adopt the Temporary Accommodation Placement and Suitability Policy, as attached at Appendix 1 to the report.

2. Suggested reasons for decision

- 2.1. The policy provides clarity and transparency in the way that the Council provides temporary accommodation.
- 2.2. Having and following a transparent policy will mitigate the risk of legal challenge.

3. Budget and policy framework

- 3.1. The policy sits as part of the Council's obligations to provide homelessness services that primarily arise through the Housing Act 1996, Part 7 as amended.
- 3.2. There are no direct implications for the budget. Indirectly the policy relates to the provision for temporary accommodation a general fund service that has a significant budget to meet the duties of the legislation.

4. Background

- 4.1. The Council has a legal duty to provide accommodation to certain groups. A temporary accommodation duty is often triggered if someone is homeless, eligible (they are eligible for public funds) and the *may* have a priority need (Families with dependent children, people fleeing domestic abuse, people that are homeless due to a fire, flood or other emergency, some care experience young people etc).
- 4.2. The policy has been developed against a backdrop of increasing homelessness pressures, shortages of affordable housing, and growing demand for temporary accommodation. It reflects the expectations set out within Andy Burnham's National Plan to End Homelessness, the cross-government strategy for England that seeks to make homelessness rare, brief and non-recurring through a stronger focus on prevention, improved temporary accommodation standards, partnership working and greater local accountability. The policy aims to balance the Council's legal duties to homeless households with the operational realities of limited accommodation supply and rising costs.
- 4.3. The policy aims to:
 - Prevent and relieve homelessness wherever possible.
 - Reduce reliance on emergency accommodation such as hotels and B&Bs.
 - Secure suitable accommodation as close to Medway as reasonably practicable.
 - Minimise the time households spend in temporary accommodation.
 - Ensure placement decisions are fair, transparent and evidence-based.
 - Protect vulnerable adults, children and households with safeguarding needs.

5. Options

- 5.1. There are three options available to the Cabinet.
- 5.2. Option 1: Adopt the policy set out in the report (Recommended).
- 5.3. Option 2: Propose amendments to the policy.
- 5.4. Option 3: Do not adopt the policy.

6. Advice and analysis

- 6.1. Option 1: Policies of this nature are good practice and strongly recommended. Whilst there is legislation and caselaw that frames how temporary accommodation provision is provided, a single policy provides a comprehensive single point of reference.
- 6.2. Andy Burnham's National Plan to End Homelessness also calls for similar action.

- 6.3. The Temporary Accommodation Needs Assessment and Delivery plan that is required to inform the development of the policy is attached at Appendix 2. This document compliments the policy by providing a detailed assessment of current and projected demand for TA across Medway. The assessment identifies key demand drivers, forecasts future accommodation pressures, and sets out a delivery plan to increase the supply of council-controlled accommodation, reduce reliance on costly nightly-paid provision, strengthen supported housing pathways and improve move-on outcomes.
- 6.4. A diversity impact assessment is attached at Appendix 3. The assessment sets out that the policy would advance equality in all cases. The assessment considers individual circumstances and how, both in the short or long term, adaptation and further support may be needed for periods of time to reduce any potential inequality caused by availability.
- 6.5. Option 2: The Cabinet could choose to make changes to the proposed policy. Any changes should be assessed by officers once changes have been proposed.
- 6.6. Option 3: The Cabinet could refuse to adopt the policy. The implications would mean that the Council was not compliant with the national plan. The Council could rely on existing legislation and caselaw, however this would be less robust than option one.

7. Risk management

Risk	Description	Action to avoid or mitigate risk	Risk rating
Temporary accommodation provision	Provision of accommodation reduces, causing the Council to be non-compliant with its own policy.	Regular monitoring and stress testing of provision. Consideration of additional capital programs or commissioning arrangement if needed.	B3
Policy adoption	The policy is not adopted by the Cabinet or is not implemented by officers.	Report, DIA and officer advice in place to support recommendation. Officers to monitor operational progress.	D3

For risk rating, please refer to the following table:

Likelihood	Impact:
A Very likely B Likely C Unlikely D Rare	1 Critical 2 Major 3 Moderate 4 Minor

8. Consultation

8.1. No formal consultation is required. Internal consultation has been undertaken.

9. Climate change implications

9.1. There are no direct implications that arise due to this report or the associated policy. However, homes are significant carbon emitters as such there is a link to temporary accommodation and the need to ensure that any accommodation used contributes to the Council's Climate Change action plan.

10. Local Government Reorganisation (LGR) implications

10.1. Following the announcement of the pause on the 7 September 2026 officers will monitor the on-going situation and will consider any relevant impacts as they arise.

11. Financial implications

11.1. There are no new costs expected from adopting this policy. Temporary accommodation budgets are under significant pressure as a result of rising need and costs, the aims of this policy support the work to reduce the pressure.

12. Legal implications

12.1. The provision of temporary accommodation is a statutory requirement arising out of the Council's homelessness duties and particularly from the Housing Act 2004. Whilst there isn't a statutory requirement to have a policy as identified it is good practice and complies with the national plan. .

Lead officer contact

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Appendices

Appendix 1 – Temporary Accommodation Placement and Suitability Policy

Appendix 2 - Temporary Accommodation Needs Assessment

Appendix 3 – Diversity Impact Assessment

Background Papers

None