

CABINET

**CLLR KEITH DIBBLE
HOUSING, PLANNING & PROPERTY
PORTFOLIO HOLDER**

20TH OCTOBER 2026

REPORT NO. PG2617

KEY DECISION: YES

TEMPORARY ACCOMMODATION PLACEMENT POLICY

SUMMARY AND RECOMMENDATIONS:

This report seeks Cabinet approval to adopt the Rushmoor Borough Council Temporary Accommodation Placement Policy (the Policy) for statutory homeless households. The Policy sets out how the Council will secure, allocate, manage and review temporary accommodation for applicants owed homelessness accommodation duties, ensuring decisions are lawful, fair, transparent and based on assessed need.

Cabinet is recommended to: Approve the Policy; delegate authority to the Chief Operating Officer, in consultation with the Portfolio Holder, to make minor operational amendments required to keep the Policy up to date; and note that the Policy will be reviewed at annually or sooner where required by legislative, statutory guidance, case law or service delivery changes.

1. INTRODUCTION

1.1. The purpose of this report is to seek approval for the Council's Temporary Accommodation Placement Policy for statutory homeless households.

1.1. The Policy provides a clear framework for officers, applicants and Members on how temporary accommodation will be used, how suitability will be assessed and reviewed, and how households will be supported to move on to settled accommodation.

2. BACKGROUND

2.1. The Council has statutory duties under Part 7 of the Housing Act 1996, as amended by the Homelessness Reduction Act 2017, to assist eligible applicants who are homeless or threatened with homelessness and, in specific circumstances, to secure suitable accommodation. Demand for temporary accommodation continues to place pressure on local authorities nationally, with limited availability of suitable accommodation and increasing complexity in household need.

- 2.2. The Policy supports the Council's housing and homelessness responsibilities by promoting lawful decision making, consistent practice, safeguarding of vulnerable residents, effective use of accommodation and public funds, and improved move-on outcomes for households in temporary accommodation.
- 2.3. The Policy also supports the Council's wider strategic objectives by helping to prevent and relieve homelessness, safeguard vulnerable residents, manage demand for temporary accommodation, support financial sustainability and provide a stronger basis for consistent and transparent decision making.
- 2.4. Authority for Cabinet to approve the Policy is set out in section 3.5. of the Council's Scheme of Delegation, Matters reserved to the Cabinet, point 5: Approval of cooperate strategies, policies and organisations programmes (and updates) prepared within the overall budget and policy framework agreed by the Council.

3. DETAILS OF THE PROPOSAL

General

- 3.1. Cabinet is asked to approve the Policy. The Policy will apply to temporary accommodation provided or secured by the Council for households to whom the Council owes, or may owe, homelessness accommodation duties, including interim accommodation, accommodation during relief enquiries, accommodation pending review or appeal where discretion is exercised, and accommodation provided while the main housing duty is owed.
- 3.2. The Policy reflects the Council's legal framework, including the Housing Act 1996, Homelessness Act 2002, Homelessness Reduction Act 2017, Homelessness Code of Guidance for Local Authorities 2018, Equality Act 2010, Children Acts 1989 and 2004, Care Act 2014, Human Rights Act 1998, Data Protection Act 2018 and UK GDPR. It confirms that accommodation secured under homelessness powers and duties must be suitable for the applicant and all household members who normally live with them or might reasonably be expected to live with them.
- 3.3. The Policy affects the whole borough and all statutory homeless households requiring temporary accommodation. It establishes how the Council will assess suitability, prioritise placements and transfers where demand exceeds supply, manage out-of-area placements, minimise use of bed and breakfast accommodation, set expectations around charges and household responsibilities, and keep placements under review.
- 3.4. Implementation will include officer guidance, clear case recording expectations, decision-making templates where appropriate, staff briefings and management oversight. This will help ensure that suitability assessments, placement decisions, transfer requests and reviews are evidenced consistently and in line with the Policy.

- 3.5. Performance will be monitored through indicators including the number of households in temporary accommodation, length of stay, use of bed and breakfast accommodation, number and duration of family or pregnant applicant placements in bed and breakfast accommodation, out-of-area placements, transfer requests, suitability reviews, complaints, rent arrears, move-on outcomes and equality impacts where data is available.

Available Options

- 3.6. Option 1: Approve the Policy. This will provide an agreed and transparent framework for decision making, strengthen governance and support consistency in service delivery.
- 3.7. Option 2: Do not approve the Policy. Not recommended because the Council would not have an agreed policy framework for how temporary accommodation is used, prioritised and reviewed. This increases the risk of poorer outcomes for households, inconsistency in decision making and greater likelihood of challenge.

Consultation

- 3.8. The draft Policy has been prepared by the Housing Service. It has been reviewed by the Council's Legal and Financial services. The Policy has also been screened for an Equalities Impact Assessment (required and attached at Appendix 2) and a Climate Change Impact Assessment (Appendix 3).

Members of the Strategic Housing Local Plan and Housing Oversight Groups have been consulted and reviewed the draft documentation.

4. IMPLICATIONS

Risks

- 4.1. Key risks include insufficient suitable temporary accommodation supply, increased use of nightly-paid or bed and breakfast accommodation, difficulty securing accommodation within the borough, legal challenge where suitability assessments are not adequately evidenced, safeguarding risks for vulnerable households, equality impacts and budget pressures. These risks will be mitigated through clear policy requirements, robust case recording, management oversight, ongoing review of suitability, monitoring of key performance information and continued focus on move-on into settled accommodation.

Legal Implications

- 4.2. Whilst there is no statutory duty to adopt the Policy, the Supreme Court in *Nzolameso v City of Westminster* [2015] UKSC 22 highlighted the importance of local authorities having a publicly available policy setting out how temporary accommodation is procured and allocated.

- 4.3. The Policy is intended to support compliance with the Council's statutory housing duties under Part 7 of the Housing Act 1996 and reflects guidance from Homelessness Code of Guidance for Local Authorities 2018. It ensures that the Council continues to meet its statutory duties to provide suitable accommodation, particularly for vulnerable individuals and supports safeguarding by promoting appropriate placements for those at-risk.
- 4.4. Failure to adopt or follow the Policy may result in complaints, reputational damage, and increased officer time spent managing reviews and appeals. It may also lead to investigations by the Local Government and Social Care Ombudsman and increase the risk of legal challenge, including Judicial Review. Consistent application of the Policy is therefore essential to minimise legal, financial, and reputational risk.

Commentary by Oksana Haraieva 02/10/2026

Financial Implications

- 4.5. Approval of the Policy does not in itself create any additional budget requirement or financial commitment. However, temporary accommodation remains a significant area of demand-led expenditure and financial risk for the Council. The Policy establishes a framework intended to support consistent and lawful placement decisions, appropriate use of available accommodation, minimisation of higher-cost emergency provision where suitable alternatives are available, effective recovery of accommodation charges and timely move-on into settled housing. The financial performance of the temporary accommodation service will continue to be monitored through existing budget management and performance monitoring arrangements.

Commentary by Peter Vickers S151 21/09/2026

Resource Implications

- 4.6. Implementation will be managed within the Housing Service. The Policy will support officers by providing a clear framework for assessing suitability, prioritising placements, recording decisions and monitoring use of temporary accommodation.

Equalities Impact Implications

- 4.7. The Policy includes specific provisions on equality and accessibility and requires decision makers to consider the needs of applicants and household members with protected characteristics. This includes disability, pregnancy and maternity, age, race, religion or belief, sex, sexual orientation and gender reassignment, as well as associated accommodation, communication and support needs. An Equality Impact Assessment has been completed and is attached as Appendix 2.

Climate Change Impact Assessment

- 4.8. The Policy has been taken through council's Climate Change Impact Assessment (CCIA) screening process (Appendix 3). A full Impact Assessment is not required as there are no direct climate implications arising from approval of the Policy. However, where accommodation options are available, the Council will consider location, accessibility to services, transport links and the need to avoid unnecessary travel as part of the wider suitability assessment. Any future procurement or commissioning of temporary accommodation should have regard to the Council's climate commitments and relevant property standards.

Other

- 4.9. No additional property, IT, crime and disorder or corporate resource implications have been identified at this stage. Any operational impacts arising from implementation will be managed through existing service planning arrangements.

5. CONCLUSIONS

- 5.1 Approval of the Policy will provide a clear and consistent basis for securing, allocating, managing and reviewing temporary accommodation for statutory homeless households.
- 5.2 The Policy will support lawful and transparent decision making, strengthen safeguarding and equality considerations, improve monitoring of temporary accommodation use and help the Council manage demand and financial pressures.
- 5.3 For these reasons, Cabinet is recommended to approve the Policy and authorise its implementation, subject to final legal, financial, equality and governance checks.

LIST OF APPENDICES:

- Appendix 1: Temporary Accommodation Placement Policy for Statutory Homeless Households
- Appendix 2: Equality Impact Assessment screening document
- Appendix 3: Climate Change Assessment screening document

BACKGROUND DOCUMENTS:

- Housing Act 1996, Part 7
- Homelessness Act 2002
- Homelessness Reduction Act 2017
- Homelessness Code of Guidance for Local Authorities 2018
- Domestic Abuse Act 2021
- Equality Act 2010
- Children Act 1989
- Children Act 2024
- Care Act 2014

- Human Rights Act 1998
- Data Protection Act 2018 and UK GDPR 2018

CONTACT DETAILS:

Report Authors Zoe Paine Strategic Housing Manager & Suzannah Hellicar, Service Manager Housing

Heads of Service Tim Mills Executive Head of Property and Growth, David Philips Executive Head of Operations

**Rushmoor Borough Council
Temporary Accommodation Placement Policy**

October 2026

Executive Summary

This policy explains how Rushmoor Borough Council provides temporary accommodation to people who are homeless or at risk of homelessness. It sets out:

- The legal duties the Council must follow
- The types of temporary accommodation available
- How placements are decided
- How suitability, affordability and accessibility are assessed.

The Council aims to provide safe, appropriate temporary housing while managing limited resources fairly.

This policy guides officers, partners, and stakeholders involved in making temporary accommodation assessments and providing housing services and provides information to Rushmoor residents who need to live in temporary accommodation.

The policy will be reviewed annually to ensure it remains compliant and effective.

1. Introduction

This policy explains how Rushmoor Borough Council ('the Council') assists people who need temporary accommodation while homelessness assessments are carried out or while they wait for an offer of settled accommodation.

There are times when people face emergencies that leave them without a home. In these situations, the council may have a legal duty to provide temporary accommodation to help them regain stability.

1.1 The Council's Statutory Duty

The Council must provide temporary accommodation in certain circumstances, as set out in the Housing Act 1996 and the Homelessness Code of Guidance for Local Authorities 2018.

1.2. Demand and supply of temporary accommodation

Demand for temporary accommodation is high, and the Council has a limited amount of its own temporary accommodation stock. Temporary accommodation must therefore be allocated fairly and proportionately. This policy explains how decisions are made to ensure the placements are suitable and equitable.

1.2 The role of elected members

The policy has been approved by the Council's Cabinet with delegated authority given to the Executive Director of Operational Services to agree general updates. The Council's Housing Oversight Group provides member oversight to the implementation of the policy. Ward councillors may become involved in individual cases.

1.3 The role of council officers

Housing Options officers assess individual circumstances and cases and make decisions in line with this policy. When doing so officers are acting on behalf of 'the Council'.

2. Legal Framework

2.1. The Council must comply with a range of legislation and guidance when making decisions about temporary accommodation, including:

- Sections 188, 193, 206, 208 and 210 of the Housing Act 1996
- The Homelessness Act 2002
- The Homelessness Code of Guidance for Local Authorities 2018
- The Homelessness (Suitability of Accommodation) (England) Order 2003
- The Homelessness (Suitability of Accommodation) (England) Order 2012

- The Homelessness Reduction Act 2017
- The Equality Act 2010
- The Localism Act 2011
- The Domestic Abuse Act 2021
- Section 17 of the Children's Act 1989
- Section 11 of the Children's Act 2004
- Relevant case law

2.2. Section 188 of the Housing Act 1996, Interim duty

The Council must provide temporary accommodation if it has reason to believe an applicant may be homeless, eligible and in priority need. This duty continues until a final decision is made.

2.3. Section 193 of the Housing Act 1996, Main housing duty

If the Council decides an applicant is homeless, eligible, in priority need and not intentionally homeless, and homelessness has not been prevented or relieved, it must secure suitable accommodation until the duty ends.

2.4. Section 206 of the Housing Act 1996, Suitability

Any accommodation provided under section 188 or 193, whether temporary or otherwise, must be suitable.

2.5. Chapter 17 of the Homelessness Code of Guidance

This sets out the factors local authorities should consider when deciding whether accommodation is suitable. These factors include the physical condition and standards of the accommodation, its size, affordability, location, facilities, and the individual needs and circumstances of the household.

2.6. Section 208 of the Housing Act 1996, Location

Requires that accommodation should be within Rushmoor where it is reasonably practicable. When accommodation is provided out of the area, the Council should notify the receiving local authority in whose area the accommodation is situated.

2.7. The Homelessness (Suitability of Accommodation) (England) Order 2012

Requires that when deciding suitability, the Council must consider:

- The distance of the accommodation from Rushmoor;
- The level of any disruption to work, caring responsibilities or education;

- Access to medical facilities and support
- Access to local services and transport

2.8. The Homelessness (Suitability of Accommodation) (England) Order 2003

Requires that households with children or pregnant women should only be housed in 'bed and breakfast' accommodation where no other accommodation is available, and for no longer than 6 weeks.

2.9. Section 11 of the Children's Act 2004

Requires that the Council must safeguard and promote the welfare of children.

2.10. The Equality Act 2010

Requires the Council to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

3. Offers of Temporary Accommodation

3.1. Interim duty-based offer

Where the interim duty applies and the applicant has nowhere suitable to stay, the Council will offer temporary accommodation while enquiries continue.

3.1.1 Suitability will be assessed using the factors set out in section 5 of this policy.

3.1.2. If the applicant refuses the offer of temporary accommodation they will be asked to give their reasons. The Council will consider the reasons given. If the Council determines that the accommodation is unsuitable, the offer will be withdrawn and a further offer will be made.

3.1.3. If the Council reviews the applicants' reasons for refusal but considers the accommodation suitable and the applicant still refuses, the interim duty ends.

3.1.4. There is no statutory right to review the suitability of interim accommodation provided under the interim duty. However, the Council will consider any concerns raised.

3.2. Main duty-based offer

Where the main housing duty applies and the applicant has no suitable accommodation, the Council will offer temporary accommodation until a settled home is provided or the duty ends.

3.2.1. Suitability will be assessed using the factors set out in section 5 of this policy.

3.2.2. If the applicant refuses the offer of temporary accommodation, they will be asked to give their reasons. The Council will consider the reasons given. If the Council determines that the accommodation is unsuitable, the offer will be withdrawn and a further offer will be made.

3.2.3. If the Council reviews the applicants' reasons for refusal but considers the accommodation suitable and the applicant still refuses, the offer will be withdrawn and 'the main homelessness duty' will end.

3.2.4. Applicants have a statutory right to review suitability under the main duty.

3.3. Accommodation provider expectations

Applicants placed into temporary accommodation must sign an agreement with their accommodation provider setting out expectations of living in temporary accommodation.

3.4. Agreement breach

If an applicant is asked to leave due to breaching the terms of the agreement the Council may treat this as refusing accommodation. The Council will consider the nature of the breach, warnings given and the applicant's personal circumstances. The consequences for refusing temporary accommodation are set out in Sections 3.1 and 3.2 of this policy.

3.5. Move to alternative temporary accommodation

Applicants may be asked to move to alternative temporary accommodation for several reasons, for example, to provide the most appropriate accommodation, or because an external provider has brought the provision to an end. Such requests will be treated as an offer of temporary accommodation as set out in Sections 3.1, 3.2 and 5 of this policy.

4. Types of Accommodation

The Council uses a mix of accommodation types, some owned or managed directly and others provided by external partners. These include self-contained which can include privately owned leased accommodation, accommodation with shared facilities such as bed and breakfast accommodation and Hostel accommodation which can be either self-contained or with shared facilities.

4.1. Self-contained accommodation

4.1.1 Leased accommodation means privately owned separate and self-contained premises (flats, maisonettes and houses) which the Council has leased for the purpose of providing temporary accommodation.

4.1.2 Leased accommodation is provided unfurnished but some discretionary help is available for households who are unable to source their own furniture and/or white goods, subject to an assessment of need.

4.1.3. Leased accommodation is only usually provided for those in longer-term temporary accommodation in performance of the 'main housing duty'.

4.2 Accommodation with shared facilities such as 'Bed & Breakfast' and hotels

4.2.1. 'Bed and breakfast' accommodation means accommodation (whether breakfast is included or not) which is not separate and self-contained premises, and where one or more of the following amenities is shared by more than one household: a toilet, personal washing facilities, cooking facilities. This can take the form of a hotel or traditional 'bed and breakfast' setting and is usually not owned or managed by the Council.

4.2.2. Bed and breakfast accommodation can be provided to households in performance of either of the interim or main duties.

4.2.3. Bed and breakfast accommodation can offer residents limited space, privacy, and amenities such as cooking and laundry facilities. The Council aims to avoid the use of such accommodation where possible.

4.2.4 Bed and breakfast accommodation may be considered suitable if emergency accommodation is needed at very short notice or if there is simply no better alternative available.

4.2.5 Bed and breakfast accommodation should only be provided to households containing children or pregnant women as a very last resort. Where this is the case, the Council will move households into more suitable accommodation within six weeks.

4.3. Hostel accommodation

4.3.1. Hostel accommodation means accommodation which may or may not be self-contained. Self-contained accommodation may also include aspects of shared facilities, such as a laundry.

4.3.2. Hostel accommodation can be provided to households in performance of either the interim or main duties.

4.4. Costs

Applicants must pay a weekly charge for the use and occupation of the premises. Those on a low income may claim Housing Benefit to help pay all or some of the charge.

4.5 Security of Tenure

Temporary accommodation offers limited security of tenure. Depending on the accommodation offered, applicants will have either a licence to occupy or a non-secure tenancy and do not have rights such as right to buy or right to exchange.

5. Suitability of temporary accommodation

The Council aims to avoid out of the area placements and bed and breakfast placements for families wherever reasonably practicable. There will be occasions where it is not reasonably practicable and such placements are necessary. The factors below should be considered when decisions are made.

5.1 Assessments

Assessment of the suitability of temporary accommodation are made based on the individual circumstances relating to any given applicant and their household. The Council's officers are experienced and have been trained in the legislation and assessment criteria, decision making is supported and recorded using a check list and casework notes. Assessments consider the applicability and significance of any of the below factors, as well as the competing demands for accommodation and the availability of accommodation at that time. The assessment takes account of all the relevant factors and circumstances together for each case.

5.1.1 Overcrowding

The size and the number of bedrooms is considered. Due to high demand and a shortage of available accommodation households may be placed in smaller accommodation than would be suitable long-term.

5.1.2 Affordability

Any temporary accommodation provided should be affordable for the applicant. Affordability is determined by the Council, in consultation with the applicant.

5.1.3 Location

Wherever reasonably practicable, temporary accommodation will be provided in Rushmoor. It is recognised that the location of accommodation is of particular importance in cases of domestic abuse or when personal safety is at risk for other reasons. Accommodation provided out of the area will be as close to Rushmoor as can be found.

5.1.4 Disruption to employment

Account will be taken of any disruption to employment that would be caused by the location of the temporary accommodation.

5.1.5 Safeguarding children and minimising disruption to education

Account will be taken of the following:

- The need to promote the welfare of and safeguard children. This includes consideration of the physical, mental and emotional wellbeing of children being placed in temporary accommodation.
- Disruption to education that would be caused by the location of the temporary accommodation, which includes but is not limited to the impact that might be felt around exam times. Any temporary accommodation provided out of the area in performance of the 'main housing duty' is likely to be for a very limited time until accommodation is found in Rushmoor. It would not usually be necessary, for example, for children to have to move school.
- Disruption to caring responsibilities that would be caused by the location of the temporary accommodation.
- The proximity and accessibility of any accommodation to medical facilities essential for wellbeing, and to transport, amenities and local services.

5.1.6. Health and support needs

Account will be taken of the following:

- Any health needs of the applicant or a member of their household should be considered when considering the suitability of any temporary accommodation. Any likely impact of the accommodation on those health needs would be relevant factors.
- Any support needs identified as part of the housing assessment would also be relevant considerations, including what the impact would be of any existing support being removed.

- Any information provided from health professionals, social care departments and other agencies will be considered.
- Provisions made for pets in the Renter's Rights Act for settled accommodation do not apply to temporary or emergency accommodation. This is because the accommodation is usually occupied on either a licence or non-secure tenancy. The Council's disability, health and support needs assessment include the need for an assistance animal. Generally, pets are only permitted in temporary accommodation when the accommodation provider allows it, where it is practical and reasonable in relation to the type of accommodation, health and safety considerations, and the needs of other residents. If a pet cannot be accommodated the Council will consider this as part of the overall suitability assessment however, this will not prevent an offer being made if the accommodation is suitable in all other respects.
- The proximity of existing family and community support networks and services, recognising their role for vulnerable households and individuals.

5.1.7. Expected length of occupation

The length of time any temporary accommodation is likely to be occupied is a relevant consideration. Accommodation that might not be considered reasonable to occupy indefinitely or for several years, may well be considered suitable for a number of days or weeks.

5.1.8. The Availability of suitable temporary accommodation

Because there is a limited supply of Temporary Accommodation account will be taken of the following:

- Housing conditions in Rushmoor and the surrounding area;
- The availability of suitable temporary accommodation locally;
- The resources available to the Council;
- Any general or acute difficulties in sourcing suitable accommodation locally;
- Competition and demand for temporary accommodation including the needs of other households requiring accommodation and the severity of those needs.

5.2 The Public Sector Equality Duty

The Council will consider whether the applicant has any protected characteristics under the Equality Act 2010, how significant they are, and how they might affect the suitability of any temporary accommodation being offered.

5.3 Any other special reasons

Consideration will be given to any other special circumstances that apply to any given applicant or their household.

6. Challenges to the suitability of temporary accommodation

6.1. Initial offer reservations

The Council aims to offer suitable accommodation the first time it makes an offer. If applicants have any concerns about the suitability of accommodation they should speak with the officer managing their homelessness application in the first instance.

6.2. Review – interim duty

There is no statutory right to review the suitability of accommodation provided under the interim duty. If an applicant refuses a suitable offer of such accommodation, they may not be owed any further accommodation duty.

6.3. Review – main duty

The suitability of accommodation provided in performance of the main housing duty is subject to a statutory right to review. Applicants owed such a duty are advised in writing of this right and how to exercise it. If an applicant refuses a suitable offer of such accommodation, they may not be owed any further accommodation duty under this section.

6.4. Review- of the policy and monitoring

The implementation of this policy is monitored by the Council's Housing Oversight Group.

6.5 Complaints

Customers can make a formal complaint about the service they receive from the Council at any time by using the Council's formal complaints process.

Equality Impact Assessment: Screening Tool

The **Equality Impact Assessment (EIA) Screening Tool** should be completed for any new proposal. It helps staff check if their proposal will positively, neutrally, or negatively affect residents, staff, or service users. If the impact is positive or neutral, a full EIA isn't needed.

A **full EIA** is required if the screening shows a negative impact on specific groups. We also advise that a full EIA should be completed when a [key decision](#) is being made. Key decisions are executive actions likely to:

- Significantly affect Council tax, budget balances, or contingencies.
- Have a major impact on communities across two or more Borough wards.
- Expenditure or savings over £100,000 qualify as significant, with a £250,000 threshold for property transactions.

Furthermore, for staff, we generally consider the impact on more than 25 people as significant, which would require a full EIA. If you're unsure, you can seek guidance from the Policy Team.

Name of Project	Temporary Accommodation Placement Policy
Reference number (if applicable)	
Service Area	Housing
Date screening completed	25/8/26
Screening author name	Zoe Paine
Policy Team sign off	Louise Ansell
Authorising Director/Head of Service name	David Philips

1. Please provide a summary of the proposal

This policy sets out how Rushmoor Borough Council will secure, allocate, manage and review temporary accommodation for applicants owed homelessness accommodation duties.

It is intended to ensure that accommodation is used lawfully, fairly, transparently and effectively, while recognising the limited availability of suitable accommodation and Rushmoor Borough Council's duty to safeguard vulnerable residents.

Whilst it doesn't deliver defined savings, the policy will support the council to deliver temporary accommodation in the most cost-effective way and minimise the use of expensive B&B accommodation.

Vulnerable households experiencing housing crisis are involved, including households with children.

The policy aims to:

- Meet statutory homelessness duties.
- Ensure temporary accommodation is suitable, safe and proportionate to household need.
- Prioritise placements fairly where demand exceeds supply.
- Minimise the use of bed and breakfast accommodation, particularly for households with children and pregnant applicants.
- Support households to move into settled accommodation as quickly as possible.
- Ensure equality considerations are actively considered when accommodation decisions are made.

The policy sets out that; decision makers must be able to demonstrate that equality considerations have been actively considered before a placement decision is made or reviewed.

Case records should show the relevant protected characteristics or vulnerabilities identified, the accommodation needs arising from them, any disadvantages that may arise from the proposed placement, any reasonable adjustments considered or made, and the reasons for the final decision.

This duty does not require Rushmoor Borough Council to achieve a particular outcome in every case, but it does require conscientious consideration of equality impacts at the time decisions are made. Some applicants may need to be treated more favourably than others to remove or minimise disadvantage linked to disability or another protected characteristic. Officers are trained in housing and equalities legislation, and decision making is supported by use of a tool kit.

2. Who will the proposal impact? Delete as appropriate.

Group of people	Impacted?
Residents	☒ Yes/ ☐ No
Businesses	☐ Yes/ ☒ No
Visitors to Rushmoor	☐ Yes/ ☒ No
Voluntary or community groups	☐ Yes/ ☒ No
Council staff	☒ Yes/ ☐ No
Trade unions	☐ Yes/ ☒ No
Other public sector Organisations	☒ Yes/ ☐ No
Others	Please specify:

3. What impact will this change have on staff? Please complete where relevant.

Housing staff will have a clear published policy to support decision making in respect of placing households into temporary accommodation. There are no implications for staffing structures or working methods.

4. What consultation or engagement will you be leading (with residents, staff, or other stakeholders) as part of this project?

Consultation will be via RBC councillors and staff. Members of the Housing Oversight Group, the Portfolio Holder and staff team as well as key partners delivering temporary accommodation in the borough will review the draft policy before it is taken to Cabinet.

5. What impact will this change have on people with protected characteristics and/or from disadvantaged groups?

Direct and indirect impacts

When completing this table, please consider both **direct and indirect impacts**, see helpful

Direct discrimination occurs when someone is treated less favourably than another person because of a **protected characteristic**. This includes:

- **Actual possession** of a protected characteristic.
- **Perceived possession** of a protected characteristic (discrimination by perception).
- **Association** with someone who has a protected characteristic (discrimination by association).

A valid comparison must show that someone without the protected characteristic would have been treated better in similar circumstances. It can still be direct discrimination even if the person treating you unfairly shares the same characteristic.

Note: Age discrimination may be lawful if it can be objectively justified. For other protected characteristics, direct discrimination is unlawful regardless of intent or justification.

Indirect discrimination happens when a **policy, rule, or practice** applies to everyone but puts people with a protected characteristic at a **particular disadvantage**. It occurs when:

- A policy is applied equally to all.
- It disadvantages a group sharing a protected characteristic.
- You are personally disadvantaged by it.
- The organisation cannot justify the policy as a proportionate means of achieving a legitimate aim.

If the policy can be objectively justified, it is not considered indirect discrimination.

For example: Closing public toilets may be an example of indirect discrimination, as it affects everyone but disproportionately disadvantages women, due to toilet frequency, alternative options and safety/hygiene factors.

Likely impact

For the groups identified earlier, tick the likely impact (both direct and indirect) on people with protected characteristics (e.g., age, disability, race, etc.):

- **Neutral:** No impact.
- **Positive:** Benefits people with protected characteristics.
- **Negative:** Harms people with protected characteristics.
- **Not Sure:** It's unclear how this affects people with protected characteristics, or more information is needed.

Rate the negative impact as **low**, **medium**, or **high**. Also, consider whether the proposal may be seen as controversial or negative by some groups. See the guidance for help.

Protected Characteristic – Age
(for example, young people under 25, older people over 65)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Staff will consider impacts on children's welfare including safeguarding risks in shared B&B, adequate space for play/school work, proximity to education, impact of instability with frequent moves. Older adults will be monitored for mobility issues, access to health care, isolation. Younger adults: vulnerability to exploitation, MH needs, stability for their education or work.

Protected characteristic - Disability

(include people with physical disabilities, people with learning disabilities, blind and partially sighted people, Deaf or hard of hearing people, neurodiverse people. This also includes carers.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Staff will consider impacts on disabled residents' welfare giving due regard to disability and medical need.

Protected characteristic - Gender reassignment and identity

(Include people who identify across the trans* umbrella, not only those who have undergone gender reassignment surgery. This is inclusive of girls and or/women, men and/or boys, non-binary and genderfluid people and people who are transitioning) *Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Staff will need to take into consideration the need for privacy in any shared accommodation and the potential for heightened risk of discrimination towards this group..

Protected characteristics - Marriage and Civil Partnership

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	No specific impacts have been identified.

Protected characteristics - Pregnancy and Maternity

(Include people who are pregnant in or returning to the workplace after pregnancy.
Could also include working parents.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Suitability of accommodation checks will take into account the needs of pregnant women and ensure facilities are appropriate and safe for young children

Protected characteristics - Race or ethnicity

(include on the basis of colour, nationality, citizenship, ethnic or national origins)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Language barriers will be addressed with appropriate interpretation service and support workers where appropriate. Cultural needs will be met as far as is practically possible with the limited housing stock available for placements.

Protected characteristics - Religion or belief

(include no faith)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Religion and belief will be respected. In borough community based accommodation located is near to a range of places of worship.

Protected characteristics - Sex

(Under the Equality Act 2010 and following the 2025 Supreme Court ruling on 15 April 2025, a person's legal sex is defined as their biological sex as recorded at birth. Trans individuals are still protected from discrimination under the characteristic of gender reassignment.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Women and girls safety is considered based on the suitability of accommodation, this is particularly important for those fleeing domestic violence. Other gender based vulnerabilities are considered

Protected characteristics - Sexual Orientation

(Include people from across the LGBTQ+ umbrella, for example, people who identify as lesbian, gay, bisexual, pansexual or asexual.)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Consideration will be given to the potential impact of placements in shared accommodation where LGBTQ people may face discrimination.

Protected characteristics - Other

(e.g. people on low incomes, people living in poverty, looked after children, people with care experience, people who are homeless, people with mental health problems, people who are prison leavers, people affected by menopause, people affected by menstruation and/or period poverty)

Positive impact	Neutral impact	Negative impact	Not Sure	Description of the impact (if applicable) <i>Consider both direct and indirect impacts when completing this table</i>
☒	☐	Choose an item.	☐	Support and signposting is available to help people with benefit claims to maximise income and other specific support needs.

Screening Decision	Outcome
Neutral or Positive – no full EIA needed*.	☒ Yes/ ☒ No
Negative – Low Impact – full EIA at the service director's discretion*.	☐ Yes/ ☐ No
Negative – Medium or High Impact – must complete a full EIA.	☐ Yes/ ☐ No
Is a full EIA required? Service decision:	☐ Yes/ ☐ No
Is a full EIA required? [Policy Team] sign off recommendation:	☐ Yes/ ☐ No
Flag for DPIA (will include engagement that collects personal data). [Policy Team]:	☐ Yes/ ☐ No
Flag for ethics (high risk / will involve engagement with vulnerable residents):	☐ Yes/ ☐ No

CCIA – Screening Tool

The Climate Change Impact Assessment (CCIA) Screening Tool should be undertaken for any new proposal. It helps staff to understand if there could or will be any positive or negative impacts relating to climate change within their proposal, whilst ensuring a full assessment isn't required for no/low-impact proposals. A full CCIA is required if the screening tool shows there to be a positive or negative impact on either the Council's Operational Carbon Footprint and/or within one of the seven categories.

Project Summary

Name of Project:	Temporary Accommodation Placement Policy
Brief Summary of Project:	The policy sets out how Rushmoor Borough Council will secure, allocate, manage and review temporary accommodation for applicants owed homelessness accommodation duties. It is intended to ensure that accommodation is used lawfully, fairly, transparently and effectively, while recognising the limited availability of suitable accommodation and Rushmoor Borough Council's duty to safeguard vulnerable residents.
Date Completed:	18-08-2026
Completed by:	Zoe Paine
Service:	Housing

How to use the Screening Tool

For each question, select Yes, No, or Unsure (select one option per row):

- Select Yes where the proposal is likely to have a meaningful positive or negative climate change impact, including any change to emissions, resource use, climate resilience or environmental outcomes. Select Yes only where the impact is likely to be more than negligible i.e. it:
 - Will or could affect more than a small activity
 - OR
 - Lasts beyond the short-term and has an ongoing or long-term effects
 - OR
 - Results in a meaningful increase or decrease
- Select No where there is no expected impact that you are aware of or the impacts are minor or negligible.
- Select Unsure where further information is needed.

1. Will the proposal have an impact on the Council's Operational Carbon Footprint?

Will the project involve any activity that could have an impact on the reported operational emissions by Rushmoor Borough Council? This would be a reduction or increase on any of the categories below:

Scope		Yes	No	Unsure
Scope 1 Emissions	Natural gas usage (e.g. heating Council-owned buildings)		x	
	Council's fleet (vehicle mileage or fuel)		x	
Scope 2 Emissions	Purchased electricity usage		x	
Scope 3 Emissions	Staff business travel (personal vehicle use for business purposes, rail / public transport)		x	
	Water usage (e.g. within Council buildings)		x	
	Waste volumes (including refuse collections)		x	
	Contractor vehicle mileage		x	

2. Will the proposal have an impact on any of the following areas?

If unsure then refer to the considerations document for more potential impacts within this category to assess if the project or proposal would have an impact in this area.

Category		Yes	No	Unsure
Energy	Will this project increase or decrease energy use?		x	
	Will this involve building heating, lighting or site/service wide equipment changes?		x	
Transport	Will this change travel patterns for staff, contractors, residents or visitors?		x	
	Will this involve vehicles, including the Council's fleet, contractors' vehicles, site visits or deliveries?		x	
Natural Environment & Biodiversity	Could this affect green spaces, trees, habitats or biodiversity?		x	
	Does this involve land use, landscaping or outdoor works?		x	
Water	Will this change water use or water efficiency?		x	
	Will this improve or reduce water quality?		x	
Waste & Materials	Will this project increase or decrease waste?		x	
	Will this involve procuring products or materials?		x	
Social Value & Climate Justice	Could this improve outcomes, put increased pressure on, or otherwise affect vulnerable residents to the impacts of climate change?		x	
	Does the proposal have social value initiatives related to climate change or the natural environment, including education, or green skills & jobs?		x	
Adaptation	Could climate change affect this project, e.g. extreme weather: flooding, heat or drought,		x	

	or service disruption? Climate change could increase demand for temporary accommodation, for example if properties were uninhabitable due to fire or flood			
	Does the project increase or reduce resilience to climate risks? Possibly in relation to above		x	
Other	Are there any other positive or negative impacts that may arise from this project, e.g. emissions offsetting?		x	