

# Consultation Report – Temporary Accommodation Charging Policy

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## 1) Executive Summary

The Temporary Accommodation Charging Policy Consulted upon would introduce charging for households who are in temporary accommodation. Coventry City Council use a range of temporary accommodation solutions which has led to an inconsistent approach to utilities payments. Some people living in temporary accommodation already pay for the utilities they use whilst many don't.

The Temporary Accommodation Charging Policy is made up of the following constituent elements:

1. **Utilities charges and Council Tax:** Making households in Temporary Accommodation responsible for the utilities (electricity, gas and water) they use and for paying their Council Tax.
2. **Storage:** Households in temporary accommodation will pay to store their belongings.
3. **Contributions to rent through a licence fee:** Households who are not entitled to full housing benefit because they work and/or have 'excess income' will be asked to make an affordable contribution towards the rent, through a licence fee.

The draft Temporary Accommodation Charging Policy was published for consultation on Friday 13<sup>th</sup> December 2019 and it ran until Friday 7<sup>th</sup> February 2020.

This document provides a summary of the consultation responses received and how they have affected the review of the draft Temporary Accommodation Charging Policy. The analysis is broken down by general public feedback and feedback received from people living in Temporary Accommodation, and or those who may soon enter temporary accommodation, and therefore will be directly impacted by the introduction of a charging policy.

## 2) Consultation Approach

The development of a draft Temporary Accommodation Charging Policy began in the Autumn of 2019. Engagement sessions with third sector organisations took place during this time to help the Council understand the advantages and disadvantages of developing, and implementing, a Temporary Accommodation Charging Policy, what elements the policy could include and how best to reach those who would be most impacted by the policy, if permission to consult was granted.

Existing forums, such as the Homelessness Forum and Frontline Network were asked to input their feedback as the consultation progressed – their feedback was submitted via the online Let's Talk Platform.

### Activities to raise awareness of the consultation survey

**Coventry City Council Website** – Information about the consultation survey and proposed key changes was available on the front page of the Council website.

#### Specific Communication to people living in Temporary Accommodation:

1. Households in temporary accommodation were informed of the consultation, in writing on the 13th December 2019 in which they were given the option to have their say via an online survey through the 'Let's Talk' website. They were also given the option to attend a focus group to discuss the proposed policy and its implications. Three of the people captured in the survey chose to attend a focus group and one person met an officer in person to complete the survey face-to-face, due to communication barriers.
2. Direct emails were also sent to all people living in Temporary Accommodation that the Council held email addresses for (over 400)
3. Translated material was sent to one person living in Temporary Accommodation at their request.
4. Visiting Officers handed out 60 flyers and one survey to people living in Temporary Accommodation.

**Social Media:** via the Council's govdelivery Coventry City Council consultation list, which has 4000 people signed up, Let's Talk Council Facebook and Twitter accounts. Over 23,000 people saw the Facebook posts and 450,000 people saw content through Twitter.

<b>Facebook</b>	
<b>Reach</b> The number of people that have seen the content within a certain period	23,665
<b>Impressions</b> The number of times a post from the page is displayed	23,882
<b>Shares</b> When a piece of content is shared with a Facebook user's friends	7
<b>Likes</b> When a user shows their support for the content	9
<b>Comments</b> When a user submits a comment on a piece of content	13
<b>Clicks</b> When a link has been clicked by a user	140

<b>Twitter</b>	
<b>Reach</b> The number of people that have seen the content within a certain period	454,699
<b>Impressions</b> The number of times the content is displayed	10,092
<b>Retweets</b> When a user re-posts a Tweet	0
<b>Likes</b> When a user shows their appreciation for a Tweet	0
<b>Clicks</b> When a user clicks on hashtag(s) in a Tweet	27

**Internal Council Communications** – The Council also publicised the consultation via the Council intranet, email ‘intranet roundup’, ‘Yammer’ and weekly news bulletin. Information was also circulated to specific employee networks.

**Targeted face to face briefings and/or email circulation** – The Council has also used existing forums or networks to raise awareness of the consultation. Face to face briefings have been held with:

- Disability Equality Action Partnership (DEAP)
- Coventry Homelessness Forum
- Front line network (network of frontline staff working in the housing and homelessness Sector)
- Specific Staff within the Council have been briefed
- Housing and Homelessness Service and staff from Family Hubs
- Email circulation to Homelessness Forum and Third Sector Organisations when consultation survey published.

### 3) Consultation Responses

For ease of reference, consultation responses from (a) the online platform, (b) face-to-face engagement and (c) Direct invitations to respond are separate out below:

#### a) Let’s Talk Coventry online engagement platform

Let’s Talk Coventry is Coventry City Council’s new online engagement platform. The platform allows members of the public to become knowledgeable about proposed changes, as well as to respond to consultations. The engagement platform contained a public survey as well as a Q+A forum for the public to ask questions about the strategy. The Q+A forum also allowed officers to respond to members of the public in a way which would clarify the scope and proposals in the consultation. There were 554 visits to the site and 180 responses/comments, as well as 2 questions.

After the consultation concluded, Council analysts identified key themes within the responses. This was accomplished through reading through all of the responses, and then categorising them. Sometimes, consultation responses touched on a number of themes.

## Online Questions

The table below shows the **questions** received from Let's Talk engagement platform, and officer comments made in response. Each of the questions has been classified into one of the above themes.

Question	Officer response and proposed change (if relevant)
Can you give me an example of why a Family is placed into TA ? out of the 413 Families is there a common reason why they are in TA?	Thank you for your question. There are many reasons why families are placed into temporary accommodation but the most common are: Family or Friends no longer willing or able to accommodate (22%), End of private rented tenancy – assured shorthold tenancy (20%) and domestic abuse (15%).
Have the Council put systems in place to help those individuals that are depress and stress using these temporary accommodation not developing any mental health by the said policy?	If someone living in temporary accommodation does disclose that they experiencing difficulties with their mental health there is an expectation that the officer will discuss the support options available. Options available will be dependent on the individual's circumstances - it may be through a self-referral to the NHS Improving Access to Psychological Therapies (IAPT) service, the person's GP or third sector organisation.
How will a household of four individuals be evaluate if only one or two are employed?	An application for housing benefits will be submitted for every adult, or couple, living in temporary accommodation. If the household is entitled to full housing benefit then the household will not be required to make a payments towards the licence fee. If the household have an excess income the Council will calculate the amount the household will have to pay. The maximum amount the households will have to pay will be the lower of 65% of the households excess income or one of the two options that are being consulted upon (the local housing allowance rate or the median rent rate).
Will this temporary policy not be another projects that will delay individuals for moving forward?	No. The policy is independent of the processes involved in allocating permanent accommodation.
Individuals consider to be earning excess incomes, what is the time frame they will spend in these temporary	The time spent living in temporary accommodation is dependent upon a number of factors, such as the household's specific needs including the size of the property they require. There is both a local and national shortage of

accommodation before be allocated a property?

larger family homes (of 3 bedrooms or more) therefore larger families have to wait longer for suitable properties to become available than smaller households.

## Online Consultation Survey Responses:

The survey on the Let's Talk Coventry platform posed 5 multiple-choice questions to gauge the strength of public opinion in relation to each policy element. There were also free-text responses to allow respondents to gather in-depth information about respondents' underlying reasoning and motivations with regards to each policy element, and the policy as a whole.

A copy of the paper survey can be found in Appendix 1.

Owing to the lengthy and sensitive nature of free-text responses, full and unabridged responses will be provided to decision makers with the cabinet report.

The survey also contained an additional 12 equalities questions.

### Respondent Demographics

Questions 1 to 5 were designed to establish respondent demographics in order to gauge the strength of feelings, opinions and emerging themes of each group. There were 180 responses broken down into the following demographics:

#### Question 1: "Which one of these categories best describes you?"

Demographic	% of Respondents
Coventry Resident	43.9%
Coventry City Council Employee	23.3%
Coventry Resident Currently living in Temporary Accommodation	15.0%
Other	5.6%
Voluntary or Community Sector Organisation	5.0%
Member of the Public – not a Coventry Resident	2.8%
Private Landlord	1.7%
Local Housing Association – Registered Provider	1.7%
Coventry City Council Elected Member	1.1%

#### Question 2: "If you are responding as a Local Housing Association please state the name of your organisation"

There were three responses from housing associations: one from Embrace Property Ltd and two from Citizen.

#### Question 3: "If you have chosen 'other' please state how you are responding"

There were 11 responses to this question which included attendees from two focus group sessions.

Two responses were from a focus group session which took place at the Coventry Haven. Four responses were from asylum seekers at a focus group session with Coventry Refugee and Migrant Centre. One response was from the homeless

charity Crisis. The remaining four responses identified themselves as TA provider, Embrace Property Lettings and Investments, Victim and homeowner.

Question 4: “If you are responding as a voluntary or community sector organisation please state the name of your organisation”

There were seven responses to this question. These are listed as Coventry Cyrenians, Coventry Jesus Centre, St Basils, Change Grow Live (CGL), St Laurence’s Church, Coventry Citizens Advice and Coventry Frontline Network.

Question 5: “If you are responding as a Private Landlord please state the name of your business”

There were two responses to this question: one from Stamp Accommodation Services and one from Embrace Property Ltd.

### Element 1 – Utilities and Council Tax

Questions 6 – 8 of the survey were designed to establish respondent’s strength of feeling towards the utilities and council tax element of the policy. The final free-flow question (8) provides more detailed insight into the reasons behind these strengths of feeling.

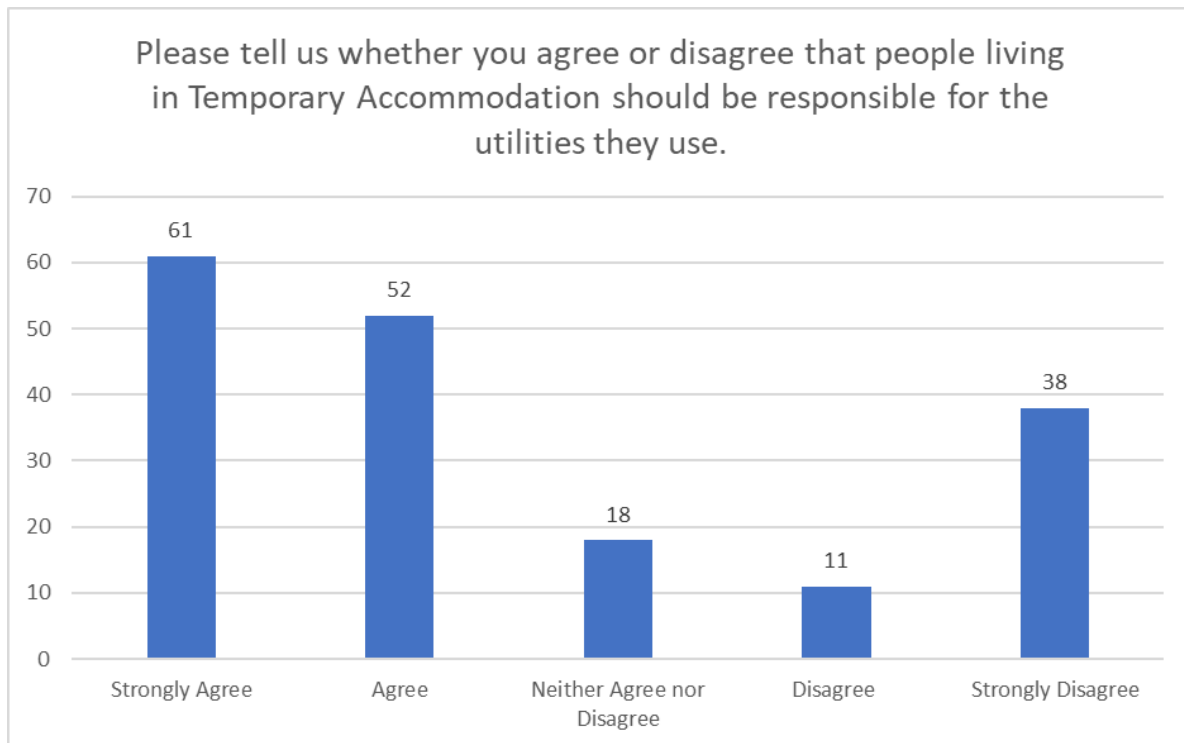
Question 6: “Please tell us whether you agree or disagree that people living in Temporary Accommodation should be responsible for the utilities they use.”

This was a multiple response question, where respondents could choose Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree, Don’t Know. In total, 180 people responded to this question, of whom:

- 62.8% indicated Agree or Strongly Agree with people in TA paying utilities (33.3% of people in Temporary Accommodation)
- 27.2% indicated Disagree or Strongly Disagree (51.8% of people in Temporary Accommodation)

The graph below shows the full count of responses in each category:

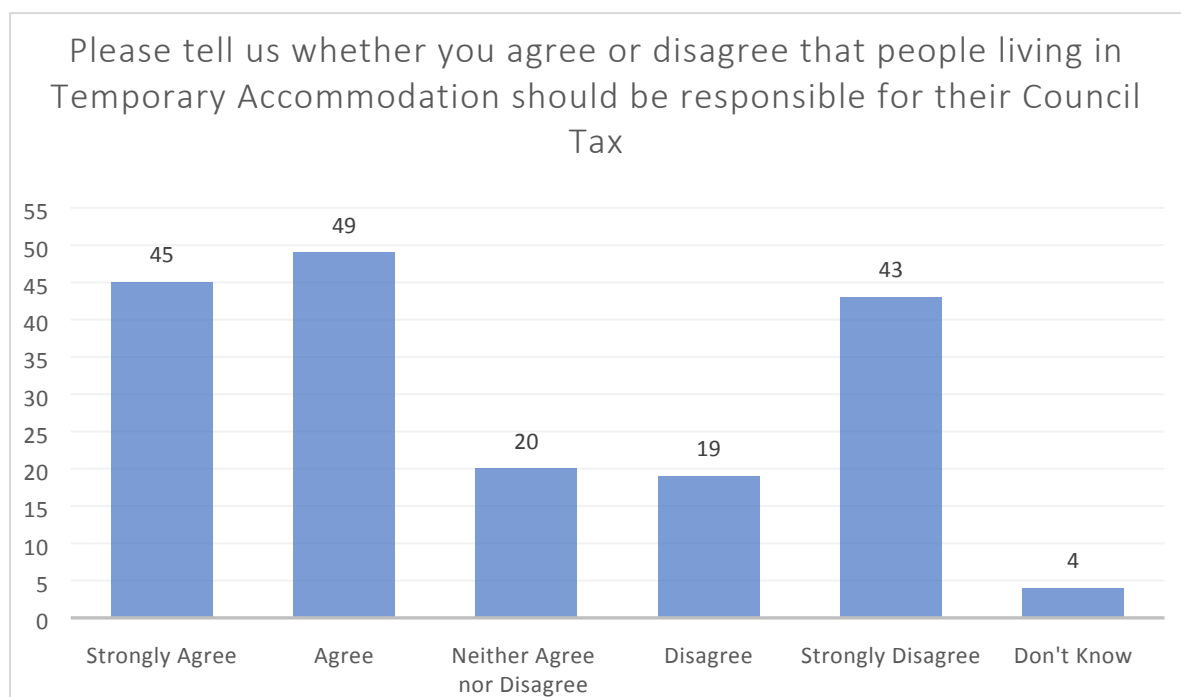




Question 7: “Please tell us whether you agree or disagree that people living in Temporary Accommodation should be responsible for their **Council Tax?**”

This was a multiple response question, where respondents could choose Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree, Don't Know. In total, 180 people responded to this question, of whom:

- 52.2% Strongly Agree or Agree (25.9% of people living in temporary accommodation)
- 34.5% Strongly disagree or disagree (22.2% of people living in temporary accommodation)



**Question 8: “If you have any comments about **utilities and council tax** please state below.”**

Question 8 was a free-text question. In total, 95 people left a comment. About as many people were generally supportive of the proposals as were concerned that the changes would cause hardship. There was a strong concern to do with ensuring that the charges were affordable, but many felt that paying a contribution could help encourage budgeting skills. The responses to this question aligned with one or more of the below themes:

**Affordability:** A number of people were concerned about whether the additional charges will be affordable.

*‘Not affordable for all households. Especially those on universal credit that are under 25 years of age.’*

**Encourages Budgeting/ Responsibility:** Some respondents were in favour of the proposals because they felt charges would help people with skills that are needed outside of temporary accommodation.

*‘Paying for the real costs of living helps people learn to budget, avoid debt and properly manage their finances. It is less of a shock when moving into permanent accommodation if people understand the real cost of living a maintaining a property’*

**Will cause further hardship:** Some respondents were concerned that the changes would cause further hardship to a group who are already badly-off and vulnerable. Many were particularly concerned about the impact upon debt.

*‘To charge for Utilities and Council Tax to these individuals would further penalise those in greatest need.’*

**Supportive of Charging:** Responses in this theme were those which were supportive of some form of charging, whether that was for Council Tax or utilities. This category was further subdivided into:

**Those Who can Afford Should Pay:** These responses were focussed around a moral principle that those who can afford to pay charges ought to make an affordable contribution.

*'Only if they are able to pay should they be charged.'*

**Some Costs Should be Payable:** There were some responses where respondents felt that only particular charges ought to be payable by those in TA. In particular, some felt that they ought to pay utilities, but not Council Tax.

*'If they are only there for a short time why should they be made to pay council tax. By all means charge them for the utilities they use'*

In addition to these two, there were also some who were fully supportive of the proposals without any alterations.

**Harder to Move on from TA:** Some respondents felt that charging those in TA would mean they would find it more difficult to move on to permanent housing, such as a private rent.

*'The Council will need to provide less to them in the long run if they are able to find accomodation sooner, in the private sector. This will take longer if they are not able to save for a deposit.'*

**Increase Social Housing:** Responses in this theme attributed the need for TA as being due to a lack of social housing.

*'This is only necessary because the council doesnt have enough housing to rent out as council accomodation'*

**Mental Health:** These responses focussed on how the changes would cause living in TA to be a more stressful experience, which might harm those with Mental Health needs.

*'I strongly object to yet more stress being piled onto poor, vulnerable & disadvantaged low income individuals and families.'*

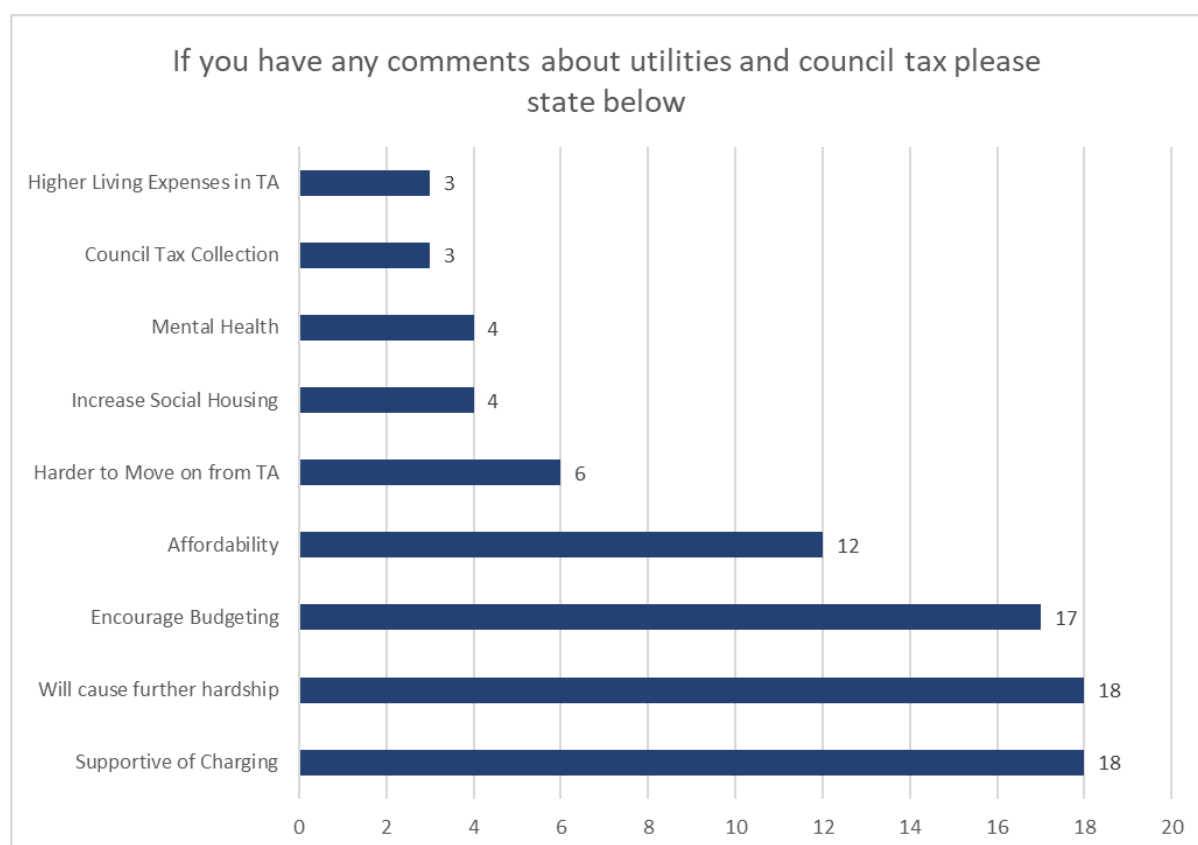
**Council Tax Collection:** Some respondents were concerned that collecting Council Tax from those whose income is variable and who often remain in TA for a short time would be difficult, and that the revenue acquired by Local Authority might be offset by increased staff time and struggles with collection.

*'Unless the council has powerful, reliable evidence from the authorities, which currently make these charges, that they cover their costs (ie staff time, collection expenses etc), I strongly object'*

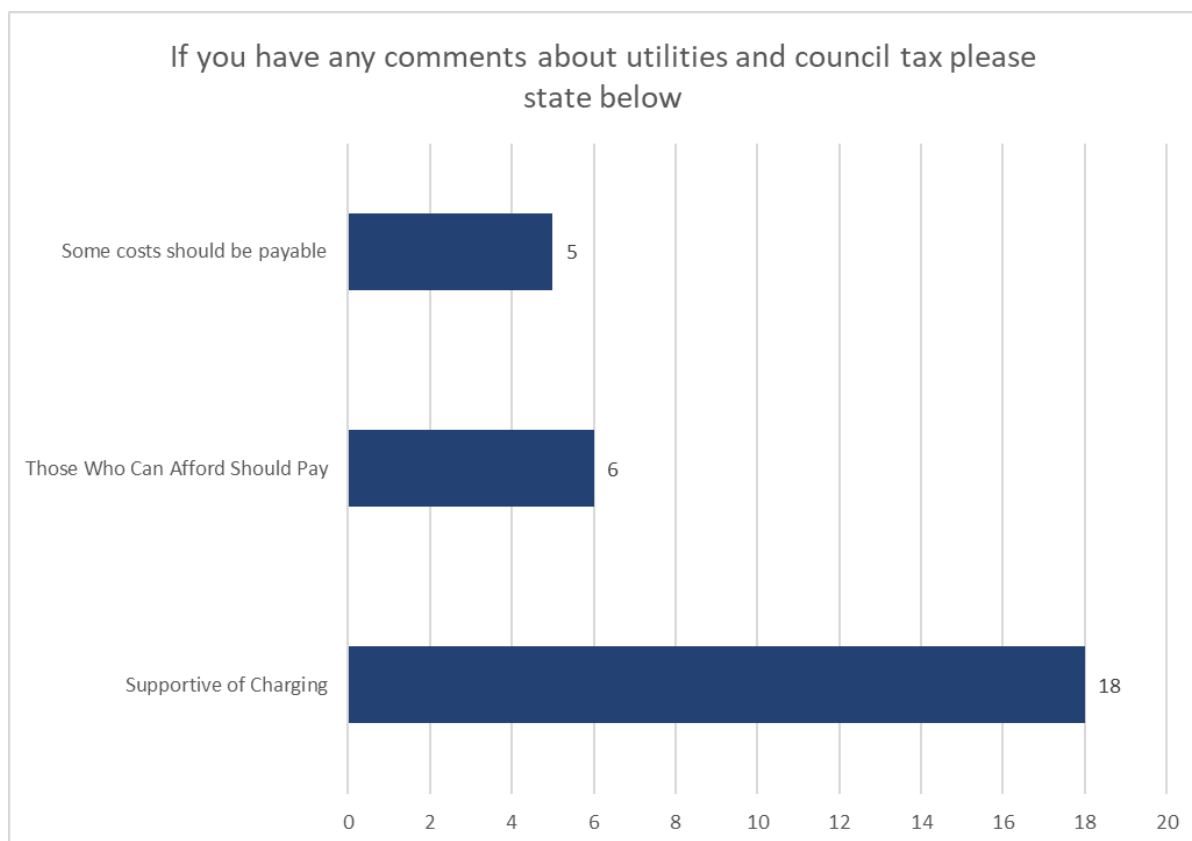
**Higher Living Expenses in TA:** A number of respondents were concerned that people in temporary accommodation have little choice over the energy provider they use, as well as sometimes having difficulty accessing kitchen facilities. These can all lead to a higher cost of living for those in TA. There were also concerns regarding the sorts of energy meter and issues with disconnection. Responses mention that young children, families, and those with chronic health conditions could be especially affected by this.

*‘Tenants will have little choice in their energy supplier, especially if in HMOs, and little choice over the use of a pre-payment meter.’*

The following graph shows the relative prevalence of these themes:



The below graph shows the breakdown of those who are supportive of charging:



### Frontline Responses:

Frontline workers from the energy sector submitted information about certain requirements and restrictions, some of which include:

#### High Costs and Energy Efficiency

We are concerned that households in TA could face higher than average costs as they have little choice about what accommodation they are placed in.

They will face higher costs if the property does not have good energy efficiency.

- Poor energy efficiency will cause a more significant problem during the winter months.
- We believe some social landlords use a set energy provider, who may not always be the cheapest. This may need further mitigation.

#### High Costs and Lack of Choice

Coventry's Frontline Network, alongside other respondents, have raised concerns that households in Temporary Accommodation may end up paying above average utility costs through no fault of their own if:

- Inefficient heating methods are used (e.g. storage heaters).
- They are placed on a high Tariff (e.g. Economy 7)

- The household cannot choose their supplier(s) or payment methods (pre-payment vs credit).

There may also be particular restrictions on switching supplier and the use of prepayment meters in Houses of Multiple Occupancy (HMOs).

Concerns have been raised around “any drive to force tenants to use prepayment meters (PPMs)”. Whilst the Frontline Networks acknowledged PPM uses for managing consumption and budgeting they raised the concerns that customers can be cut off if not kept in credit (self-disconnection) that standing charges still apply if no energy is used, and PPM costs are higher per unit than other options.

### **High Costs and Inequality**

Actual energy usage and costs will depend on the household make-up: health issues, children in the family, whether residents are working or at home in the day.

There is therefore the risk that some people will be disproportionately impacted by this element of the policy. Especially if their income does not reflect their needs (e.g. they are awaiting a decision on a Personal Independent Payment)

The Energy UK PPM Principles for prepayment meters highlights, in their vulnerability checklist, people who would be classed as at serious risk to health from self-disconnection, including people with health conditions, such as COPD, and young children.

Whilst not their preferred solution, Coventry’s Frontline Network suggested that if PPMs were used, they would support the adherence to the Energy UK PPM Principles for prepayment meters, providing extra support for vulnerable consumers.

### **Suggested Policy Changes**

Respondents to the survey have suggested the following policy changes:

- Households in Temporary Accommodation should have choice over their energy supplier and payment method if being asked to pay for their usage. Switching suppliers and payment methods can save users a lot of money and help them control their usage.
- Residents to be referred to energy advice. This could also identify whether the household is eligible for other support such as the Priority Services Register.
- Collective switching might lower bills for multiple properties used for Temporary Accommodation.
- If PPMs are used adherence to the Energy UK PPM Principles for prepayment meters, providing extra support for vulnerable consumers. This includes restrictions on the installation of PPMs such as:
  - A customer must be able to understand and operate the PPM and visit top-up points to add more credit and must not live ‘quite a distance’ from a top-up point
  - must not require a continuous supply for medical/health reasons such as medical equipment.
  - PPMs must be accessible so users can operate the meter. It must be situated inside and in a room to which they have continuous access.
  - Physical or mental disabilities may make PPMs unsuitable.

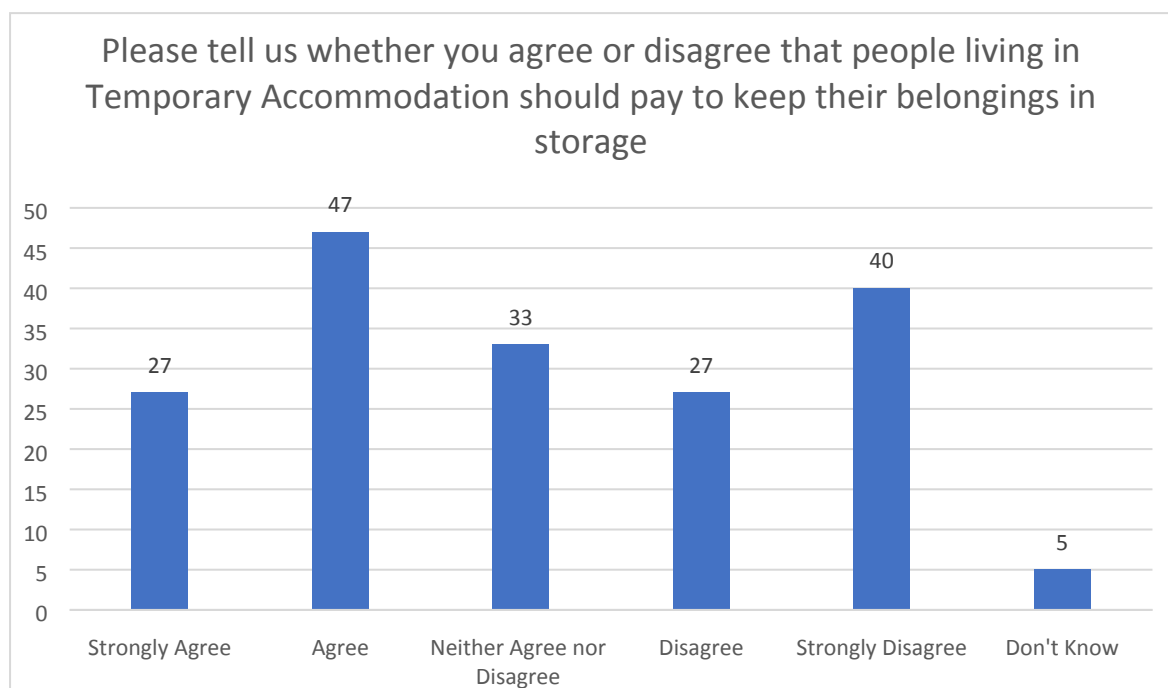
## Element 2 – Storage

Questions 9-10 of the survey were designed to establish respondent’s strength of feeling towards the storage element of the policy. The final free-flow question (10) provides more detailed insight into the reasons behind these strengths of feeling.

**Question 9** “Please tell us whether you agree or disagree that people living in Temporary Accommodation should pay to keep their belongings in storage.”

This was a multiple response question, where respondents could choose Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree, Don’t Know. In total, 180 people responded to this question, of whom:

- 41.4% Strongly Agree or Agree (14.8% of people living in temporary accommodation)
- 37.4% Strongly Disagree or Disagree (40.7% of people living in temporary accommodation)



**Question 10:** “If you have any comments about storage costs and charging please state below”

Question 10 was a free-text question. In total, 83 people left a comment to this question and there were eight specific comments about whether the council should charge for storage and/or removals when responding to other survey questions.

About as many people were generally supportive of the proposals as were concerned that the changes would cause hardship. There was a strong concern to do with ensuring that the charges were affordable, but many felt that paying a contribution could help encourage responsibility to declutter household items.

Of those against applying a charge, a proportion of respondents felt that it was unreasonable to charge because it was not a household's fault that they had found themselves in temporary accommodation.

Of those in favour of charging, several respondents stated that there should be a capped contribution – either by allowing a period of time before charging or by charging a 'reasonable' or 'nominal' amount. Some of the responses in favour of a cap on storage costs were because it was acknowledged that people could be in temporary accommodation for a long time.

A number of responses felt that the cost of storage should be shared between the resident and the council.

The responses to this question aligned with one or more of the below themes:

**Affordability:** A number of people were concerned about whether the additional charges will be affordable.

*'I think it depends on the circumstances. But people in temporary accommodation provided by the council probably won't have the means to pay for storage'*

**Encourages Responsibility:** Some respondents were in favour of the proposals because they felt charges would incentivise people to de-clutter and reduce the amount of items they take into TA.

*'A charge may deter people from taking advantage of a very expensive service they don't need'*

*'There also needs to be a way of discouraging occupants from bringing all their possessions into TA properties. Sometimes this introduces fire risk, makes for a poor living environment and makes it difficult for people to move quickly when they are vacating the property'*

*'Normally if you are homeless, surely your priority would be to sell the furniture etc to get some money to pay for the essentials in life (roof over your head / food) not get the council to pay for storage of these items'*

**Will cause further hardship:** Several respondents were concerned that the changes would cause further hardship to a group who are already badly-off and vulnerable. Some were particularly concerned about increased debt and the likely emotional impact.

*'This will trap families into a cycle of unbreakable debt that will cause future homelessness'*

*'For someone that has to leave their home is a stressful time as it is. Especially if they have been evicted. So by charging them full price on removal and storage will add to this stress and trauma'*



**Supportive of Charging:** Responses in this theme were those which were supportive of some form of charging for storage and some were focussed around a moral principle that those who can afford to pay charges ought to make an affordable contribution.

*'Some costs should be payable this should not be free'*

*'I think people should pay towards the storage of their belongings if they can afford it'*

**Harder to Move on from TA:** Some respondents felt that charging those in TA would mean they would find it more difficult to move on to permanent housing, such as a private rent.

*'Again, this will make the amount of time families are not self sufficient longer, as they will not be able to save for a deposit for a home'*

**Not the Household's Fault:** Some respondents felt that it was unfair to charge when some people had ended up in TA through no fault of their own.

*'Many of those made homeless have not asked to be made homeless and are already struggling. Losing their possessions if they are unable to afford the storage fees will just add insult to injury'*

**Shared Responsibility for Storage:** Responses in this theme suggested the both TA households and the council had responsibilities to alleviate the issue of storage.

*'I believe both sides should brunt the payment in regards to storage'*

*'I would like to see the council possibly helping to move furniture and such to a friend's house or anywhere the person in temporary accommodation might also have available'*

**Capped Contribution:** Several respondents thought that there should be a grace period before applying a charge, while others suggested a reasonable or nominal amount.

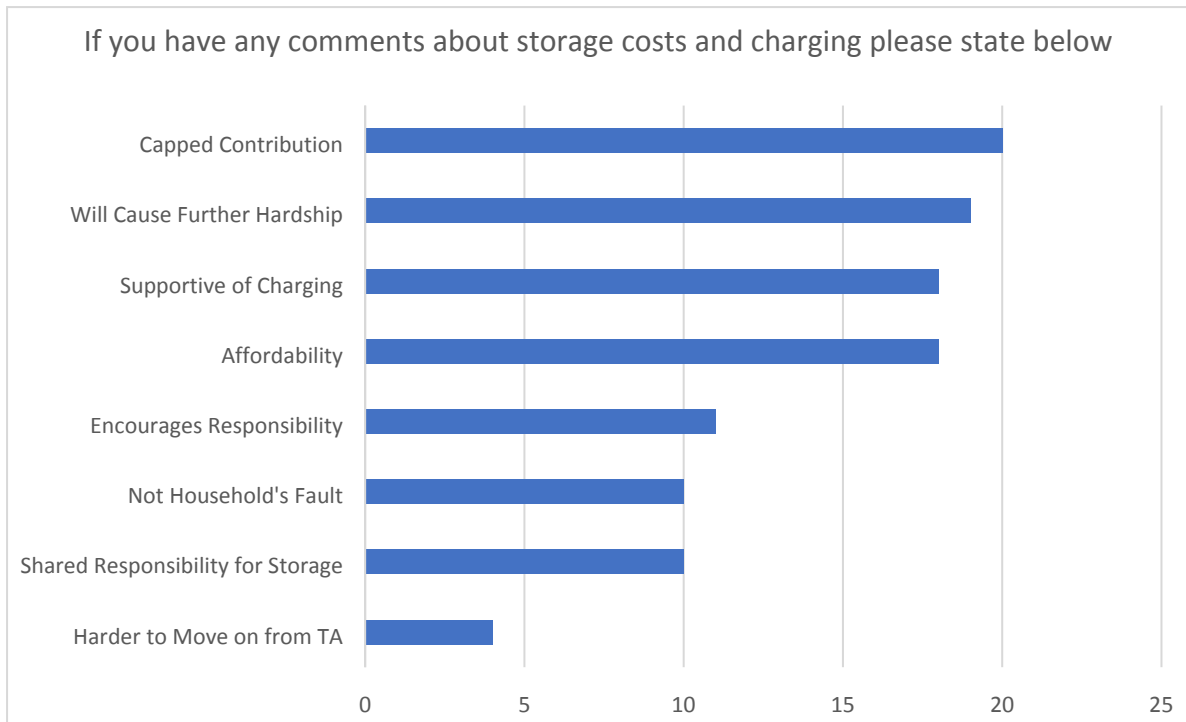
*'I think a contribution should be made but it should be capped to reduce debts increasing whilst people are in an already stressful situation'*

*'Maybe a reasonable contribution would be a better solution than the whole cost'*

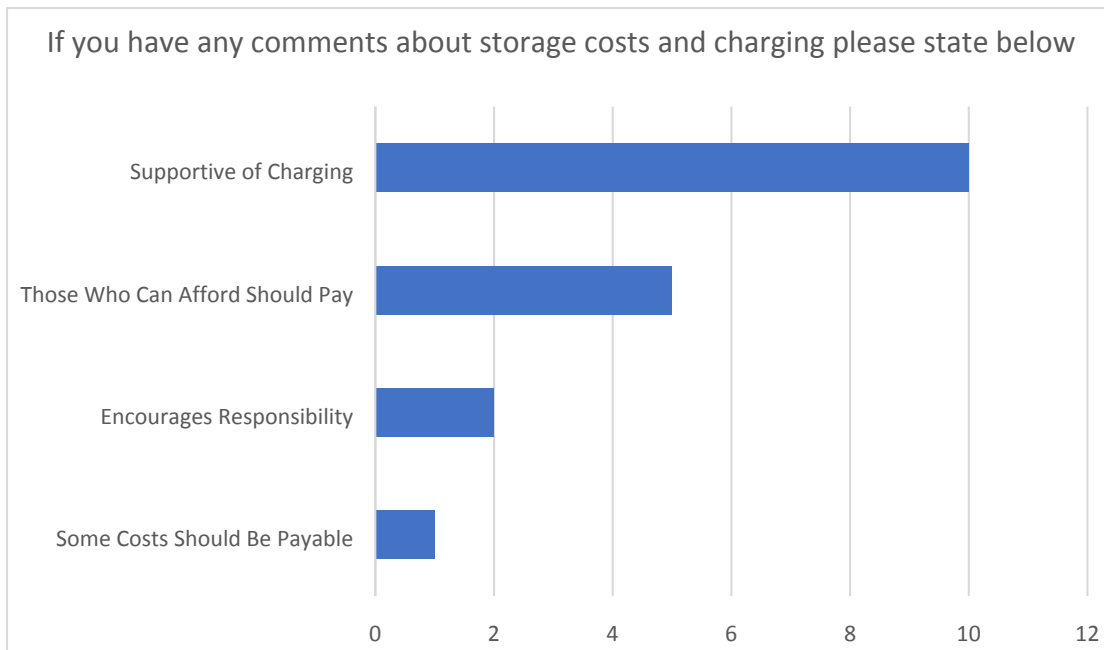
*'Allow 1 month free for people to sort out their own storage, then charge'*

*'To have a limited time what is free to store first 30 days free after must pay if not sell it and use this money as distribution to the costs'*

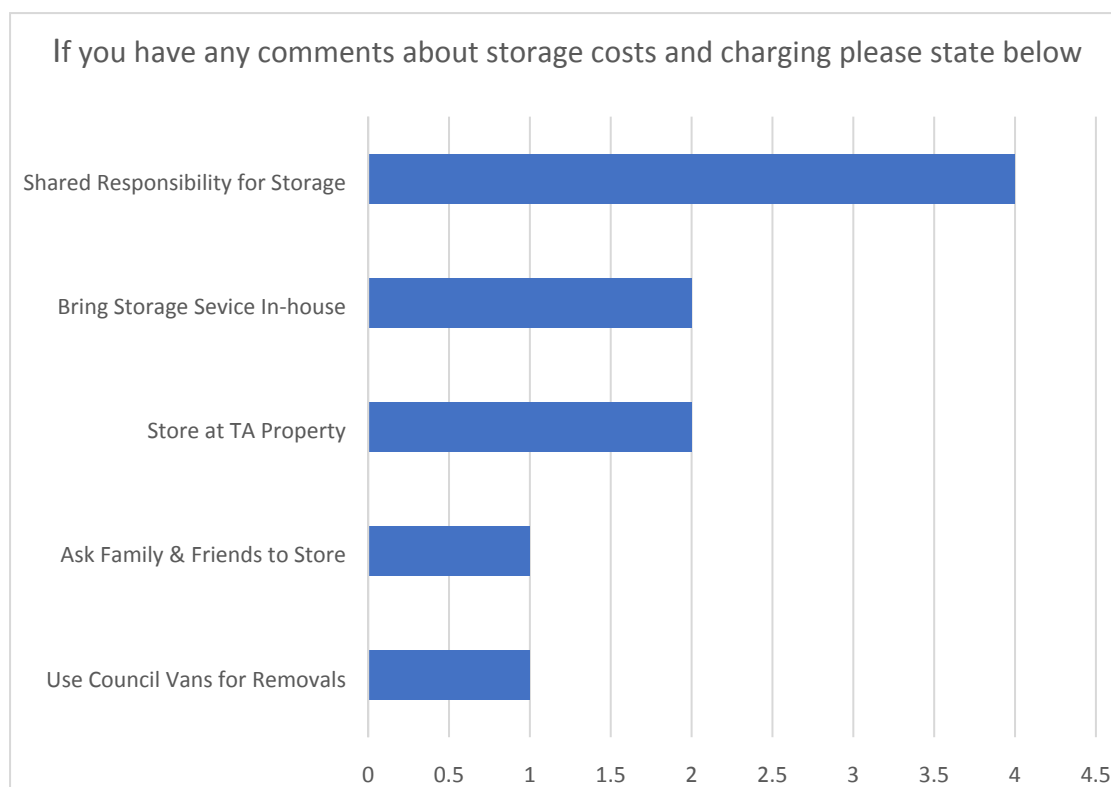
The following graph shows the relative prevalence of these themes:



The below graph shows the breakdown of those who are supportive of charging:



The below graph shows the breakdown of those who feel that the responsibility for storage should be shared:



## Suggested Policy Changes

1. Some of the respondents suggested a change to the proposed policy, with regards to the storage element. The most popular suggestion was that of a capped contribution. Solutions included:
  - a. First month or first 30 days free to allow people time to organise their belongings (four people suggested a time limit)
  - b. A set amount of items could be stored for free and a charge incurred for any extra items
  - c. A charge should be made for non-essential items only
  - d. A reduced rate for people on certain benefits such as PIP and Pension Credit
2. Coventry's Frontline Network pointed out that the draft policy does not make it clear whether people who are not in receipt of housing benefit can make a claim towards storage costs under Direct Housing Payments. Direct Housing Payments can only be made to people in receipt of housing benefit. The policy will be changed to reflect this.
3. Coventry's Frontline Network raised concerns that high costs for storage could lead to households failing to store their belongings and getting rid of them instead, or falling behind on storage payments, leading to their belongings being disposed of. They stated that at a later date, this could lead to yet further pressure on DHP or the Community Support Grant, as households struggle to furnish any new tenancy (likely to be unfurnished) and access these funds to help. This could delay them moving on from Temporary Accommodation to stable tenancies. Discussions with internal Council departments has revealed that people in temporary accommodation can apply to the Community Support Grant for essential items however if it is deemed

that people disposed of items when they could afford storage costs then it is possible a community support grant will not be awarded.

### Element 3 – Licence Fee

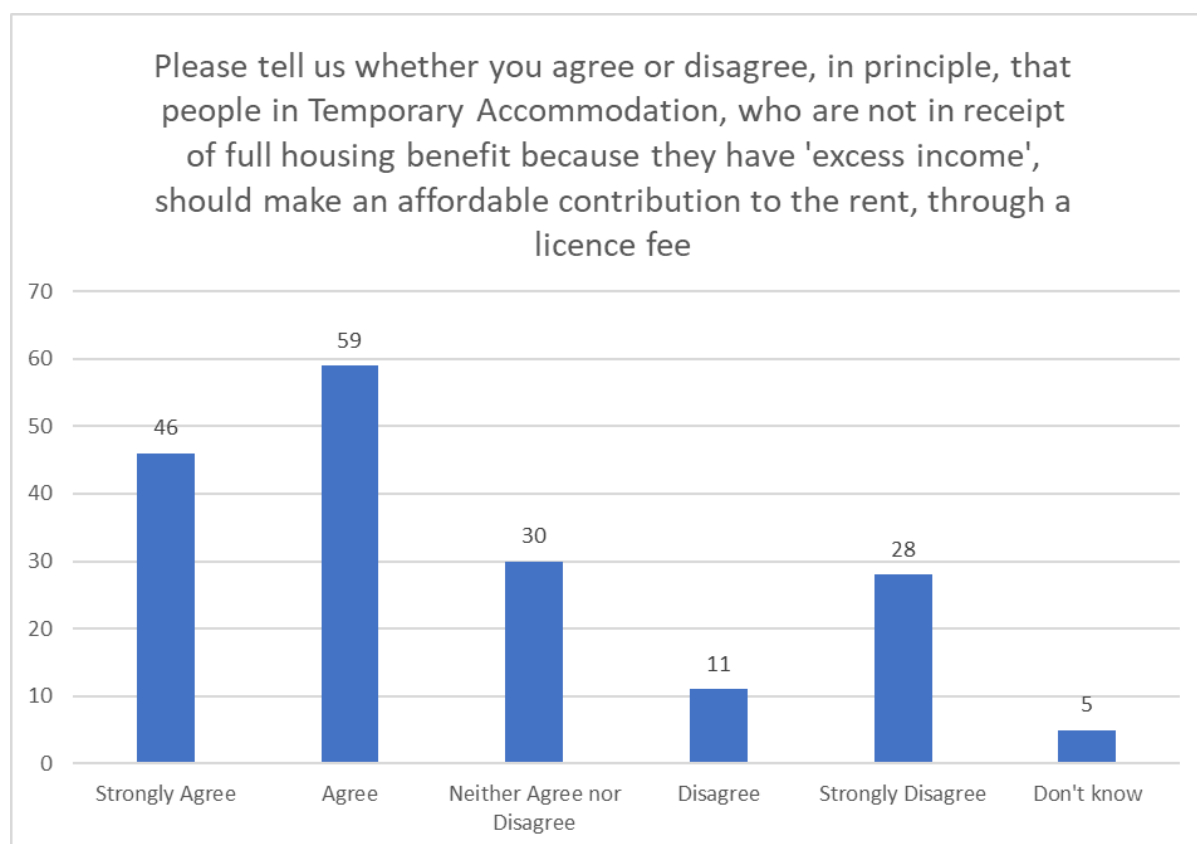
Question 11 of the survey was designed to establish respondent’s strength of feeling towards the Licence fee element of the policy, whilst Question 12 asked the respondents to choose their preferred. The final free-flow question (12) provides more detailed insight into the reasons behind these strengths of feeling.

**Question 11: “Please tell us whether you agree or disagree, in principle, that people in Temporary Accommodation, who are not in receipt of full housing benefit because they have 'excess income', should make an affordable contribution to the rent, through a licence fee?”**

This was a multiple response question, where respondents could choose Strongly Agree, Agree, Neither Agree nor Disagree, Disagree, Strongly Disagree, Don’t Know. In total, 179 people responded to this question, of whom:

- 58.7% Agree or Strongly Agree with people paying a rent contribution through a licence fee (22.2% of people in Temporary Accommodation)
- 21.7% disagree or strongly disagree (40.7% of people in Temporary Accommodation)

The following graph shows the count of responses for each option:



Question 12: “If you have any comments about the Council's proposal for households not entitled to full housing benefit because they work and/or have ‘excess income’ to make an affordable contribution towards the rent, please state below.”

Question 12 was a free-text question. In total, 75 people left a comment. A common thread linking many comments was that they wished the system to be sensitive to the needs of individuals. In particular, many respondents wished for affordability to be fairly assessed on a case-by-case basis. Public responses tended to align with one or more of the below themes:

**Affordability:** A number of people were concerned that this will greatly impact on those of low income, and make it unaffordable for them, leading to people out of work and into full housing benefit.

*“Residents who work may get excess income but they also have more to pay for out of their own pocket. When someone receives full housing benefit, any money they receive from the council (Universal Credit) they can keep and use towards other bills, yet people who work are expected to pay for their full or partial rent and bills on top leaving them with less money than people who don't work, claim UC and have full housing benefit.”*

**Supportive of charging:** A number of people agree that those in TA ought to contribute towards their rent, on the assurance that they can afford the cost. Respondents felt that affordability checks should be made first, and families assessed on a case by case basis.

*“Agreed if a fair method of means testing is used to determine amounts a household can afford, taking into accounts all current debt commitments.”*

**Will cause further hardship:** Some respondents were concerned that introducing rent contributions could cause further hardship to a group who are already badly-off and vulnerable. Many were particularly concerned about the impact upon debt.

*“People in temporary accommodation are the most vulnerable in the city and often at the most chaotic time of their lives. To pass on the responsibility for these costs to this cohort of people is reckless and risks making their situation even worse. Many of those housed temporarily do not have the skills to ensure these costs are met, yet there is no mention of what support here would be to budget and ensure these costs are met.”*

**Disincentive to Work:** Some respondents felt that seeking rent contribution from those who work would discourage employment and into full housing benefits, as they are being given a financial penalty for being employed.

*“This is a further disincentive for people to be in paid employment because their “excess income” as it now attracts a further penalty in the form of a “licence fee”.*

*“You are simply looking for more creative ways to take money off the poorest sector of society. You may be saving the Council money here by doing this*

*but you will push up the cost of other services and possibly crime too, by inflicting such hardship. I am very concerned by the sharp increase in the use of Food banks in Coventry in the last year alone.”*

**Encourages Budgeting and Responsibility:** Some respondents feel that introducing a rent contribution will be a positive way of encouraging people to responsibility of their everyday needs and budget their finances accordingly. But others felt that those housed temporarily do not have the skills to ensure costs are met and would require support and guidance first to help manage their finances effectively.

*“If they were in their own housing they would have to pay so why not in temporary? I have seen first-hand how the homeless spend their money at the shop by mine, alcohol, cigarettes and scratchcards (£50 in one go) If they had to take responsibility for some of their needs I hope they would not be wasting it on such luxuries.”*

*“People in temporary accommodation are the most vulnerable in the city and often at the most chaotic time of their lives. To pass on the responsibility for these costs to this cohort of people is reckless and risks making their situation even worse. Many of those housed temporarily do not have the skills to ensure these costs are met, yet there is no mention of what support here would be to budget and ensure these costs are met.”*

**Higher Living Expenses in TA:** Some respondents felt that the cost of living in TA can be higher due to a lack of choice. Respondents were keen that any contributions were small and bases on a fair case-by-case assessment.

*“If the charge is affordable then there is no issue as they would need to contribute to rent when move on to permanent accommodation. Sometimes the cost of TA can be excessive e.g. If in a hotel so a contribution based o. Income is not unreasonable”*

**Children Affected:** Some were concerned that this would impact on those with children and that the council should evaluate each application separately to ensure that this ‘excess income’ wasn’t needed towards dependants.

*“I agree about the contribution ut need consider the situation of each individual, for example they may be earning enough but as an example a single mum with a child should be taken in account transportation costs out of school childcare costs to be able to work,etc.”*

**Domestic Violence:** Some feel that this change could impact those fleeing from Domestic Violence.

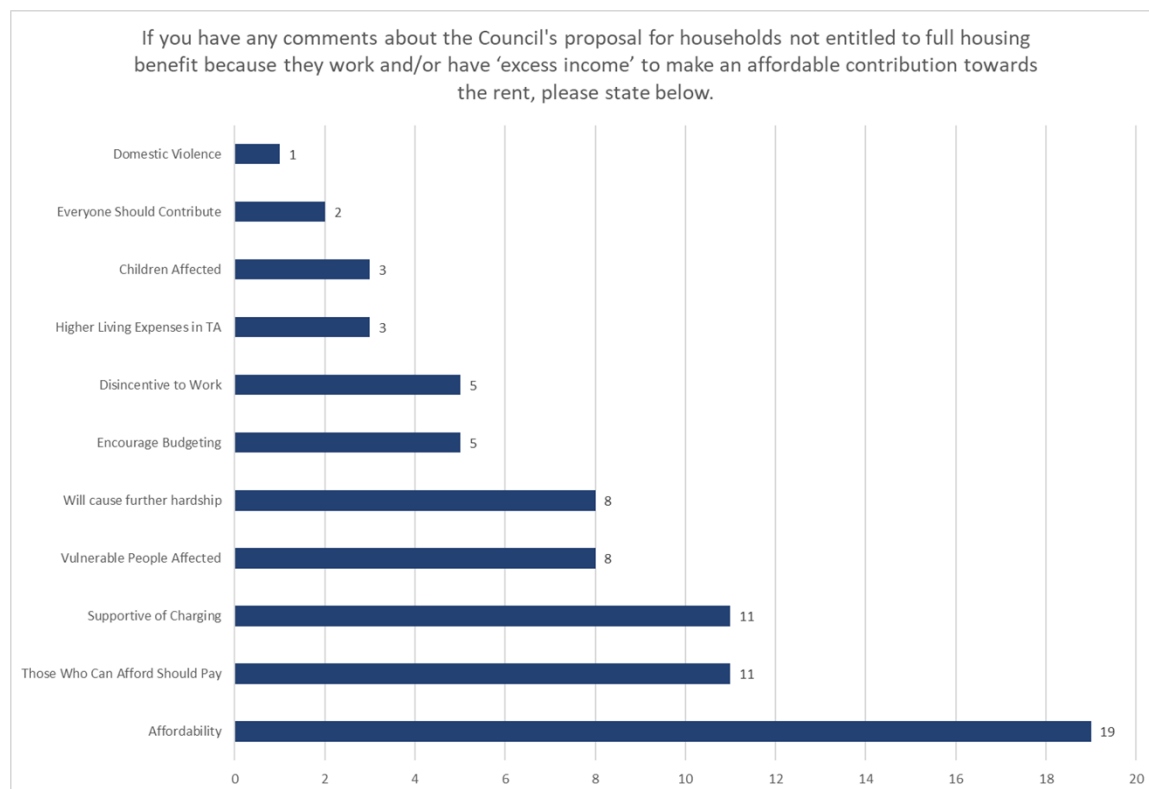
*“Additionally the Council need to remember those seeking temporary acc are vulnerable, usually escaping DV or financial crises' putting a cost on aid is a dangerous move for the Council as a whole.”*

**Everyone Should Contribute:** Some felt that everyone should have to contribute towards their own living costs.

*“I have to pay a mortgage and live next door to temporary accommodation/housing association.*

*they get their house at a massive reduced rate whilst I have to pay the full amount. plus my tax contributes to their allowance etc. if you live in a house you should pay towards it”*

The following graph displays the relative prevalence of these themes:

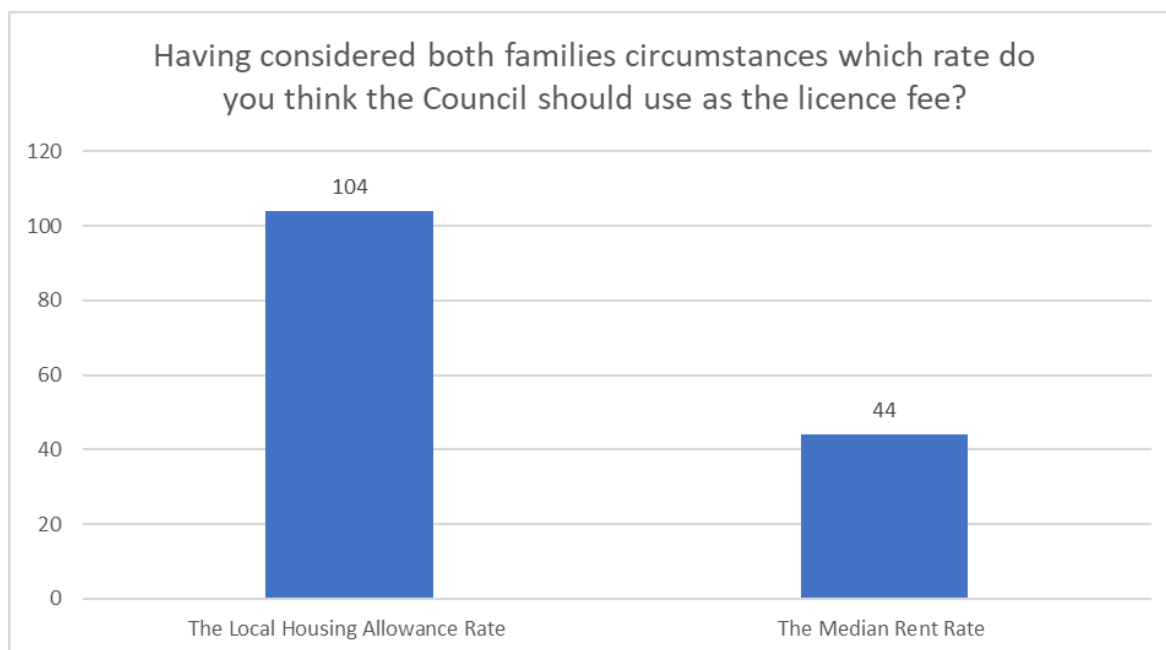


**Question 13: Having considered both families circumstances which rate do you think the Council should use as the licence fee?**

This was a multiple response question, where respondents could choose either the Local Housing Allowance (LHA) or Median Rent rate as their preferred option. In total, 148 people responded to this question, of whom:

- 70.3% favoured the LHA rate (72.7% of people in Temporary Accommodation)
- 29.7% favoured the Median Rent rate (27.3% of people in Temporary Accommodation)

The following graph displays the total count of responses:



#### Question 14: Please explain your answer...

Question 14 was a free-text question. In total, 100 people left a comment. There was broad support for the LHA rate since many felt that it was more affordable. Affordability and fairness were the primary concerns of respondents. As in other questions, respondents were keen that calculations of affordability were sensitive to the real lives of people. Public responses tended to align with one or more of the below themes:

**LHA rate is more affordable:** A large number of respondents felt that the LHA rate was the most affordable and that it would have a reduced impact on households relative to the Median Rent option.

*“The temporary accommodation is unlikely to be ‘ideal’, so not necessarily housing that the family would have chosen in different/better circumstances. I therefore believe that families should contribute, but the LHA seems a more reasonable compromise.”*

**LHA rate appropriate as used for HB:** A number of respondents felt that the the LHA rate was more appropriate and the fairest option since it is used as a basis for Housing Benefit calculations.

*‘As the LHA rate is used to assess those claiming Housing Benefit, I do not see why a different rate should be used for those who do not qualify for that benefit.’*

**Licence fee:** Some respondents were concerned about both of the options and think that introducing this fee will push families into further financial struggle and potentially out of employment.



*“Neither. Why isn't there a drop down option for neither? this is clearly biased. You are asking which is the least worst option, without the option to record those like myself who do not think it is ethical to reduce someones income by 25%. or more like 33% if you take into account additional charges such as storage. You are pushing these people further into poverty and removing any incentive to work. Certainly as a mother myself, I would rather stay at home and look after them if i was Emma (above) than pay these additional fees.”*

**Supportive of charging:** Responses in this theme were generally supportive of the charges, with many feeling that it was reasonable or fair. However, respondents were keen that the charges were sensitive to individual cases.

*“This is fair for the people in temporary accommodation and fair for all who have to pay their council tax”*

*“When it comes to talking money - it's difficult as each case is unique. People should be charged something as it will encourage them to find alternative solutions asap. When they pay nothing what incentive is this to help themselves. Factors about why they are in this situation should also be taken into account as things are not always this Black & White”*

**Affordability:** A number of respondents were concerned about the affordability of charges. Some were concerned that many already struggle and that both of the scenarios did not take into account all of the factors which could affect the affordability of charges for families.

*“Emma has 3 children, all older. Meaning she would have to pay Childcare, including higher rate on school holidays. She will have to pay uniform, school meals, travel and other school expense for EACH child. This is dis-including her own travel costs and lunches at work. Same with Michael and Sarah, looking at income as a basic rate as well as minimal on expenses (and child expenses are not optional, you have to pay for travel, you have to feed them) whilst having a baby is an option this should not be limited due to their local Council looking to save money.*

*Personally I think the figures are unrealistic and incorrect, even down to the benefits they receive - who can work full time and still get over £1000 benefits? no one... and if anyone is getting that much money a month, accommodation wouldn't be an issue, you'd just go private, you'd have the bond/depo.”*

**Those who can afford should pay:** Responses in this theme felt that those who are on higher incomes ought to contribute. Some respondents, however, were concerned that charges could be set at too high a level and that there ought to be an amount of money left over after charging which families can use for emergencies as well incentivising employment.

*“I do think all households should contribute towards these costs and a licence fee, however, I do think it more fair for there to be an allowance for families*

*that do work harder/earn more to not have to pay more than others do... i worry a little this may demotivate them to keep working/earning more”*

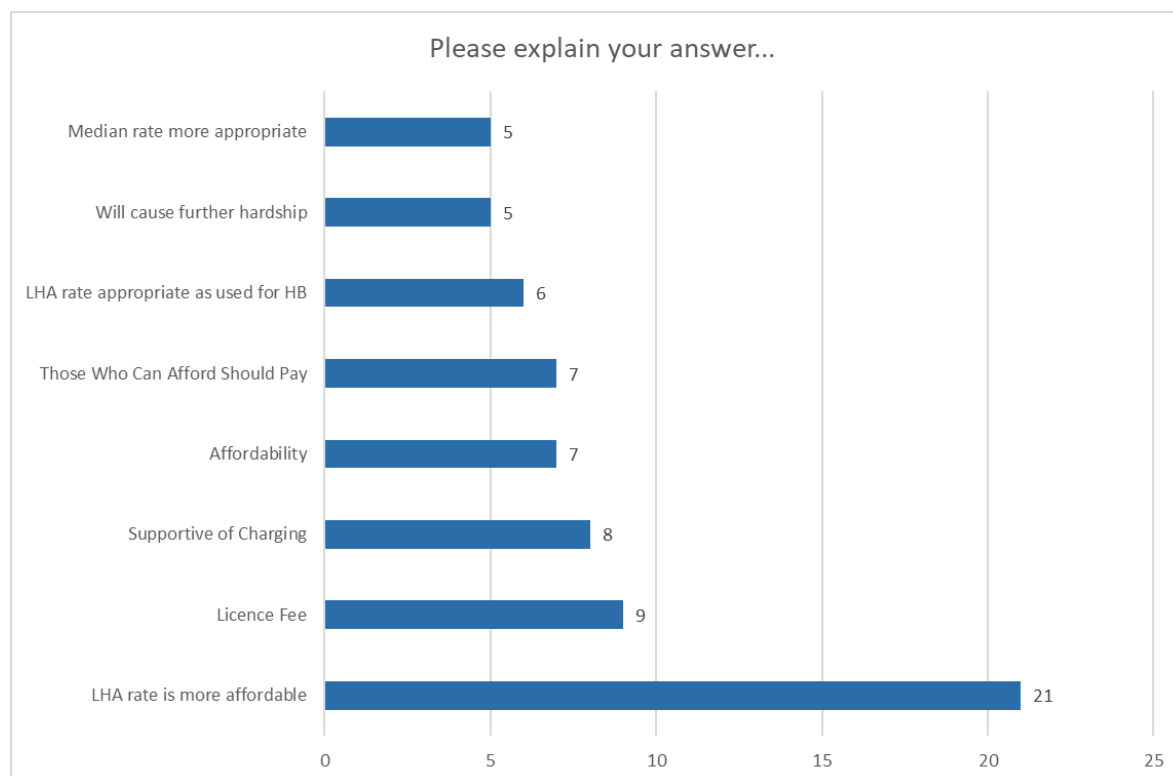
**Will cause further hardship:** Responses in this them were concerned that these charges would further disadvantage people who are experiencing hardship.

*“I do not agree with any of the costs until you are put in a house that is your permanent house. The charges are excessive and how anybody expects a family to have the amount shown above free each week is beyond me. Putting calculations on paper is nothing like the reality of life. On paper I may be seen to have 200 a week extra income but the reality is i live week to week. I work hard for my income so I can provide for my family I was made homeless through no fault of my own. I don't see or understand why I should be made to go into debt or be broke and struggling because of the charges of the rental prices. Vacant properties is not our issues. It is an understanding surely that properties are not always filled and the owners of the properties should not be allowed to have the tenants suffer when they know what they are doing when offering the property as temporary. The word temporary is self explanatory.”*

**Median rate more appropriate:** Some respondents feel that the Median rate is more appropriate, as it more greatly reflected private sector rent levels and therefore would create a realistic expectation.

*“If people are to be encouraged to rent within the private sector from homelessness, then the charges need to reflect actual rents. This was there is no real/huge financial advantage to 'waiting for a council house”*

The following graph shows the relative prevalence of these themes:



### Suggested Policy Changes

Respondents to this question, for the most part did not suggest any particular policy changes outside of the comments already mentioned. The one concrete suggestion was for a grace period before charges applied:

*'With vulnerable tenants being asked to bear the risk of not being able to make designated payments, in the form of potential eviction, we have a concern that means assessment - a difficult task at the best of times - is likely to exacerbate the pre-existing lack of financial resilience among tenants; especially where tenants' circumstances are subject to regular change... other than abandoning this proposal, there are no easy solutions to this issue either. As a result we would, again, recommend a grace period be considered for these tenants (those on low incomes/in receipt of/entitled to local housing allowance payments).'*

**Question 15: If there is anything else you would like to tell us regarding the proposed Temporary Accommodation Charging Policy please state below.**

This was a free-text response question which encouraged respondents to mention anything else to do with the policy which they had not yet mentioned. The majority of the responses went over themes which have already been explored in other questions. However, a number of responses mentioned some alternative suggestions for the policy.

**Alternate Ways to Save Money:** Some respondents suggested other ways that Local Authority could save money.

One respondent suggested that Local Authority ought to invest less in redeveloping the city centre:

*'I think there is areas the Council could look at in savings instead of emergency housing... All the money we have put into student accommodation, city developments that are pointless (such as those GIANT cement balls in town and relocating escalators for an open environment) due to the city of culture'*

One respondent was perhaps suggesting rent controls:

*'Easy solution*

*Reduce hotel rates down to maximum average 65 to 50-45*

*Shared accommodation to 35-40*

*And you will make much more money without anything*

*Average person need to reduced 4 £ a day*

*These can be optaiond simply reducing rent paid out or taken out from benefits.*

*Absolutely can be made more than 1 million £ savings this way.'*

Another respondent suggested that increasing speed at which Homefinder works might reduce costs for TA:

*'Yes of course one of the solutions example one of my friends , Homefinder was offer him a house is been 5 weeks since the offer but still he is waiting without any good reason. If the the Homefinder give the house for them even the one months rent I'll be save which £2300 a month.'*

**Alternative Suggestions for Implementation:** A number of responses focussed on different ways of carrying out the policy.

One respondent suggested that instead of charging for utilities from different suppliers, the Council could impose a service charge contribution:

*'I do not think charging for utilities, at different tariffs and from different suppliers is fair to customers. I think a service charge would be a better and fairer way to charge people.'*

Another respondent noted that charges could come as a shock to those entering TA and that there ought to be a breathing space before they kick in:

*'We have recommended, across the board, the consideration of a grace period to both give tenants a breathing space to organise their affairs and an*

*incentive to resolve their homelessness problems before fees and liabilities kick in. Here, we would like to add for consideration the option of a 'breathing space' - in effect, a suspension of payments - after payments have commenced to reflect particular tenant hardship (whether accumulated or issue driven).'*

Another respondent suggested that charges could be combined and paid before benefits payments arrive:

*'if you really were concerned about tenancy ready issues, any individual that may struggle could have their utilities/combined by yourself and automated to leave tax etc their DWP benefits and contributions before received by that person'*

## **b) Face-to-Face Consultations**

Consultation feedback was also received through the use of the focus groups which were set up in partnership with third sector organisations whom deliver services to, or advocate on behalf of, people who will, or may be, directly impacted directly by the implementation of the Temporary Accommodation Policy.

- i. A Focus Group with survivors of domestic abuse – during the initial Equalities and Consultation Analysis women, and women fleeing doestic abuse in particular, were identified as potentially being disproportionately impacted by the policy.
- ii. A Focus Group with people currently living in Temporary Accommodation
- iii. Two Focus Groups with service users of Coventry Refugee and Migrant Centre

### **i. Focus Group with Women who have experienced Domestic Abuse**

A focus group, facilitated by Coventry Haven Women's Aid, was attended by two women who have experienced domestic violence and/or abuse on Thursday 23rd January 2020.

Coventry Haven, a fully accredited member of Women's Aid, provide temporary fully supported refuge accommodation to women and their children who have experienced domestic violence and/or abuse. Refuge accommodation provided by the Haven is not included in the Council's Temporary Accommodation case load, and therefore statistics.

Historically, women and children temporarily accommodated by the Haven often moved onto permanent accommodation, bid for through Coventry Homefinder. It is now however becoming increasingly common for women and children to enter Temporary Accommodation provided by Coventry City Council as they come to the end of their support plan because of the shortage of social housing in the City.

The women who took part in the focus group may therefore soon enter into temporary accommodation provided by the City and will therefore be directly impacted by the proposed policy, if it is implemented.

### **Utilities and Council Tax**

Women who live in Haven accommodation pay a £13.00 service charge per week – it is presumed this includes a contribution towards utility costs and Council Tax. In light of the contribution they make both women stated that they ‘strongly agree’ or ‘agree’ with the proposal to charge people living in Temporary Accommodation for the utilities they use. When asked about charges for Council Tax, one strongly agreed with the proposal to charge for Council Tax whilst the other stated that she ‘agreed’.

### **Belongings in Storage**

Opinions on the charging were divided with one attendee ‘strongly agreeing’ with the proposal to charge for storage and the other stating that she ‘neither agreed nor disagreed’. The latter expressed the view that the decision to charge for storage and removals should be made on a case by case basis. If, for example, the household has to leave the property in an emergency (e.g. through domestic violence) and they cannot make their own arrangements for their belongings then a charge should not apply. However, if the household is made homeless through their own actions (e.g. through non-payment of rent) then they should be made to pay.

### **Licence Fee**

The room was equally divided over licence fee charges with one person stating that a licence fee should not have to be paid if the household is homeless through no fault of their own. Both attendees stated that the LHA rate is their preferred licence fee rate because it is the lower of the two.

## **ii. Focus Group with people living in Temporary Accommodation**

A letter informing people living in temporary accommodation of the consultation and how they can have their say was sent out on 12<sup>th</sup> December 2019. The letter included the offer of attending a focus group however no interest was expressed. A reminder email was then sent after Christmas which resulted in 6 people asking to attend a focus group. The focus group was held on Wednesday 29<sup>th</sup> January 2020 with 3 people who live in temporary accommodation being in attendance.

The session began with an introduction to the proposed policy and each element before questions were answered. The session then moved on to include a discussion around each element individually to understand participants thoughts, feelings and ideas.

### **Utilities and Council Tax**

Respondents stated that ‘paying for utilities is normal’ and that ‘they want to pay as they have responsibilities’. They therefore agreed in principle with people living in Temporary Accommodation paying for their utilities and Council Tax but only as long as the bills are affordable. All attendees stated that the quality of the temporary

accommodation they were being provided did not provide the Council with Value for Money.

One person accommodated at Caradoc Hall who is already paying for their own utilities stated that the property, with storage heaters, is expensive to heat – costing over £400 per month. They expressed concern for families who do not work that are placed into cold properties.

### **Storage**

Two of the attendees currently have belongings in storage. They were undecided on the storage element of the policy. Similar to the utilities charges, they want to live up to their responsibilities but they feel the charges are unaffordable. They also raised the following concerns:

- There was a lack of information at the point of being allocated temporary accommodation. They did not know at the time how long it would take to be housed. They have been waiting over a year for an offer of accommodation, paying storage for this length of time.
- They are not allowed to enter the storage facilities to retrieve items which not only makes reducing the amount they have in storage difficult it also means they cannot access important documents, such as birth certificates.
- If they had known at the point of being offered temporary accommodation how long it would take, and the likely cost, they would have sold some of their furniture.

They did suggest the Council use alternative forms of storage, such as garages, but it was explained that the Council do not own any empty garages and that they would not provide the level of security required to keep their items safe.

### **Licence Fee**

Attendees again agreed in principle with the proposal to charge a licence fee but so long as it is affordable. The following concerns were raised:

- One attendee raised a concern that the introduction of the licence fee and council tax charges will disincentivise working.
- The cumulative impact of paying utilities (on a property with a low EPC rating), council tax, storage charges and licence fee could result in financial hardship and them being forced to choose which payments they could make.
- People will be placed into a difficult predicament as they will not be able to save money to pay for carpets and furniture that they will need once they are offered permanent accommodation.

### **Other comments**

The households wanted to raise issues around the quality of temporary accommodation provided. In addition to the issues around energy efficiency of properties, one person stated that they had been struggling with repairs not being completed by their private landlord. The toilet in the property has been leaking for some time and they were struggling to resolve a mice infestation. They wanted to



raise the matter because they feel “*The Council is being robbed*” especially in light of the high rents charged by private landlords for temporary accommodation.

One attendee also asked if we could consider combining all charges to make it easier to pay.

### **iii. Focus Group with people who are, or have been, refugees or asylum seekers**

Two focus groups, facilitated by Coventry Refugee and Migrant Centre, were attended by eight people who are, or have been, refugees or asylum seekers on Monday 3<sup>rd</sup> February 2020.

The first session was conducted with four attendees, all of which were Arabic speakers. The online survey questions were read out to the attendees in Arabic using the in-built translation software.

The second session was conducted with four attendees whose native language was Tigrinya. This language was not available on the translation software, so a translator was used.

The sessions began with an introduction to the proposed policy and each element before questions were answered. The session then moved on to include a discussion around each element individually to understand participants thoughts, feelings and ideas.

#### **Utilities and Council Tax**

The respondents stated that they felt that if you had a home you should expect to pay bills. They added, however, that they would not be able to afford to pay bills. One reason given was that, as they were asylum seekers, they received an income which was less than standard benefits. Another comment was that they could afford to pay bills if they were working but unable to afford it if they were not.

#### **Storage**

Overall, the attendees disagreed with the proposal to charge for storage. No specific reasons were given other than they wouldn't be able to afford a charge as they were on low incomes.

#### **Licence Fee**

There was an overall agreement from the attendees that they would be able to pay a licence fee if they were working, but unable to pay if they were not in work.

#### **Other Comments**

One attendee commented on an additional expense incurred by them due to living in temporary accommodation:

*“School is far away and bus pass is expensive and sometimes I cannot afford it”*



This comment suggests that the person concerned has, on occasions, not been able to send their child(ren) to school due to distance from where they live.

### c) Direct invitations to Respond

A meeting with DEAP (Disability Equality Action Partnership) took place on 6th February. The Disability Equality Action Partnership (DEAP) is chaired by Councillor Thomas and meets three times a year. The partnership is attended by persons with disability within a diverse cross section of Coventry residents, charities/voluntary organisations and service users.

The meeting involved the Head of Housing, Jim Crawshaw, explaining the reasons the Council are considering a Temporary Accommodation Charging Policy and the elements that we are consulting upon. Rather than run through each element separately the meeting involved a more general discussion around the policy proposals as a whole and the experiences of people with disabilities.

The partnership fed back that they feel the current situation does not teach people to manage their finances and debts and they could not understand why we are not already charging for rent, utilities, council tax and storage. They stated that the money that has been spent so far could have been spent on other areas such as adult's social care. One attendee also expressed the view that it does not provide people in temporary accommodation with an incentive to improve their situation, they said; *"It's the same as the rich getting richer and poor getting poorer"*, which pointed towards a positive equalities impact with regards to fostering good relations between persons who share a relevant protected characteristic and persons who do not share it, given people with protected characteristics are often over-represented within Temporary Accommodation.

The discussion moved onto utilities – one attendee with a disability stated that they prefer pre-payment meters as they don't want to run up a debt. However, it was acknowledged that some people with disabilities (such as COPD) have higher energy usage and this form of payment may not be suitable for them.

One attendee requested someone with a disability help with assessing finances in order to help decide what is fair and also to advocate for service users. A utilities working group was discussed and it was suggested that someone with lived experience of disability is involved in the working group and looking at utility payment solutions. They also suggested we connect with 'Hope into Action' around homelessness in general.

## Key suggestions from consultation on the Policy

### **Element 1 – Utilities and Council Tax**

Key suggestions for change	Council Response
Households in Temporary Accommodation should have choice over their energy supplier and payment method if being asked to pay for their usage. Switching suppliers and payment methods can save users a lot of money and help them control their usage.	A working group has been set up to establish the best way of paying for utilities and to develop guidelines for staff and households in temporary accommodation.
Residents to be referred to energy advice. This could also identify whether the household is eligible for other support such as the Priority Services Register.	A working group has been set up to establish the best way of paying for utilities and to develop guidelines for staff and households in temporary accommodation.
Collective switching might lower bills for multiple properties used for Temporary Accommodation.	A working group has been set up to establish the best way of paying for utilities and to develop guidelines for staff and households in temporary accommodation.
<p>If PPMs are used adherence to the Energy UK PPM Principles for prepayment meters, providing extra support for vulnerable consumers. This includes restrictions on the installation of PPMs such as:</p> <ul style="list-style-type: none"> <li>• A customer must be able to understand and operate the PPM and visit top-up points to add more credit and must not live 'quite a distance' from a top-up point</li> <li>• must not require a continuous supply for medical/health reasons such as medical equipment.</li> <li>• PPMs must be accessible so users can operate the meter. It must be situated inside and in a room to which they have continuous access.</li> <li>• Physical or mental disabilities may make PPMs unsuitable.</li> </ul>	A working group has been set up to establish the best way of paying for utilities and to develop guidelines for staff and households in temporary accommodation.
Instead of charging for utilities from different suppliers, the Council could impose a service charge contribution.	A working group has been set up to establish the best way of paying for utilities and to develop guidelines for staff and households in temporary accommodation.

Charges could be combined and paid before benefits payments are given to people in TA.	Benefits are issued by the Department for Works and Pensions and not the Council therefore it is not possible to implement this suggestion.
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### **Element 2 - Storage.**

<b>Key suggestions for change</b>	<b>Council Response</b>
Discretionary Housing Payments can only be made to people in receipt of housing benefit – not those who are working and not in receipt of housing benefit.	The policy was changed to reflect this. Changes can be found in paragraph 10.7 of the Temporary Accommodation Charging Policy.
Discussions with internal Council departments has revealed that people in temporary accommodation can apply to the Community Support Grant for essential items however if it is deemed that people disposed of items when they could afford storage costs then it is possible a community support grant will not be awarded.	The policy has been changed to reflect this feedback. Changes can be found in paragraph 10.9 of the Temporary Accommodation Charging Policy.
Some of the respondents suggested a change to the proposed policy, with regards to the storage element. The most popular suggestion was that of a capped contribution and seven respondents suggested a time limit before charging. Solutions included: <ul style="list-style-type: none"> <li>a. First month or first 30 days free to allow people time to organise their belongings</li> <li>b. Three months grace period before charging</li> <li>c. 56 days grace period (based on period of relief duty) before charging</li> <li>d. A set amount of items could be stored for free and a charge incurred for any extra items</li> <li>e. A charge should be made for non-essential items only</li> <li>f. A reduced rate for people on certain benefits such as PIP and Pension Credit</li> </ul>	The policy has been changed, (with additions to paragraph 10.4 and 10.5) to include a grace period of one month before a charge for storage will apply.

**Element 3 – Licence Fee**

<b>Key suggestions for change</b>	<b>Council Response</b>
Respondents to the consultation chose the LHA rate as the preferred licence fee rate.	Paragraphs 6.2 – 6.4 and the abbreviations/jargon section of the Temporary Accommodation Charging Policy have been changed accordingly.
A grace period prior to the application of charges to those in TA to minimise hardship.	All households currently living in TA will receive 28 days' notice regarding charging. All new households entering TA will be required to meet the cost from day one as they would if they moved into any other form of rented accommodation
Increasing the speed that Homefinder works could reduce the costs of TA.	There is a shortage of social housing both locally and nationally. The service will be working to utilise the private rented sector to assist in meeting homeless duties and moving households out of TA.
The cost of hotel rates and shared accommodation could be reduced.	The Service is working hard to reduce the costs of temporary accommodation and has reduced costs by over £1million p.a. during 2019/20

**Other Suggestions:**

<b>Key suggestions for change</b>	<b>Council Response</b>
Money could be saved elsewhere instead of charging for TA by reducing expenditure on city centre redevelopment projects.	All of the city centre redevelopment projects are largely funded from capital and ring-fenced grant funding. Therefore, we could not use this resource to fund temporary accommodation expenditure.
More social housing could be built.	The Council is working with housing associations in the city to increase the amount of social housing being developed.