

# Cabinet

Date: **26 September 2024**

Time: **2.00pm**

Venue: **Council Chamber, Hove Town Hall**

Members: **Councillors:** Sankey (Chair), Taylor (Deputy Chair), Alexander, Burden, Daniel, Muten, Pumm, Robins, Rowkins and Williams

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Chief Executive  
Hove Town Hall  
Norton Road  
Hove BN3 3BQ

Date of Publication - Wednesday, 18 September 2024

# AGENDA

## Part One

## Page

### 55 PROCEDURAL BUSINESS

- (a) **Declarations of Interest:** Statements by all Members present of any personal interests in matters on the agenda, outlining the nature of any interest and whether the Members regard the interest as prejudicial under the terms of the Code of Conduct.
- (b) **Exclusion of Press and Public:** To consider whether, in view of the nature of the business to be transacted or the nature of the proceedings, the press and public should be excluded from the meeting when any of the following items are under consideration.

*Note: Any item appearing in Part Two of the agenda states in its heading the category under which the information disclosed in the report is exempt from disclosure and therefore not available to the press and public.*

*A list and description of the exempt categories is available for public inspection at Brighton and Hove Town Halls and online in the Constitution at Part 3E*

### 56 MINUTES

**To Follow**

To consider the minutes of the meetings held on 18 July and 12 August 2024

### 57 CHAIR'S COMMUNICATIONS

### 58 PUBLIC INVOLVEMENT

To consider the following matters raised by members of the public:

- (a) **Petitions:**  
To receive any petitions presented by members of the public.
- (b) **Written Questions:**  
To receive any questions submitted by the due date of 12 noon on the 20 September 2024
- (c) **Deputations:**  
To receive any deputations submitted by the due date of 12 noon on the 16 September 2024

## **59 ISSUES RAISED BY MEMBERS**

To consider the following matters raised by Members:

### **(a) Written Questions:**

To consider any written questions

## **60 MATTERS REFERRED TO THE EXECUTIVE**

## **61 REPRESENTATIONS FROM OPPOSITION MEMBERS**

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| <b>62</b> | <b>HOUSING STRATEGY 2024-2029</b>   | <b>7 - 106</b>           |
|           | <i>Contact Officer:</i> Steve Morton  |                          |
|           | <i>Ward Affected:</i> All Wards   |                          |
| <b>63</b> | <b>IMPROVING HOUSING SERVICES: RESPONSE TO THE REGULATOR OF SOCIAL HOUSING RULING</b> | <b>107 - 122</b>         |
|           | <i>Contact Officer:</i> Martin Reid   | <i>Tel:</i> 01273 293321 |
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| <b>64</b> | <b>GENERAL FUND BUDGET PLANNING AND RESOURCE UPDATE 2025-26</b>                       | <b>123 - 166</b>         |
|           | <i>Contact Officer:</i> Nigel Manvell   | <i>Tel:</i> 01273 293104 |
|           | <i>Ward Affected:</i> All Wards   |                          |
| <b>65</b> | <b>PARKING REVIEW UPDATE</b>  | <b>167 - 180</b>         |
|           | <i>Contact Officer:</i> Charles Field   | <i>Tel:</i> 01273 293329 |
|           | <i>Ward Affected:</i> All Wards   |                          |
| <b>66</b> | <b>SUPPORTED ACCOMMODATION FOR YOUNG PEOPLE PLACEMENTS</b>                            | <b>181 - 188</b>         |
|           | <i>Contact Officer:</i> Steve Dillow  | <i>Tel:</i> 01273 291019 |
| <b>67</b> | <b>MENTAL HEALTH SUPPORT SERVICES FOR ADULTS</b>                                      | <b>189 - 204</b>         |
|           | <i>Contact Officer:</i> Bernadette Alves  |                          |
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| <b>68</b> | <b>PUBLIC HEALTH COMMUNITY NURSING SERVICES</b>                                       | <b>205 - 218</b>         |
|           | <i>Contact Officer:</i> Sarah Colombo   | <i>Tel:</i> 01273 294218 |
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|           | <i>Contact Officer:</i> Andy Witham   | <i>Tel:</i> 01273 291498 |
|           | <i>Ward Affected:</i> All Wards   |                          |

## **PART TWO**

### **70 PART TWO MINUTES OF THE PREVIOUS MEETING**

**To Follow**

To consider the Part Two minutes of the previous meeting

### **71 PART TWO PROCEEDINGS**

To consider whether the items listed in Part Two of the agenda and decisions thereon should remain exempt from disclosure to the press and public.



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### **Further information**

For further details and general enquiries about this meeting contact John Peel, (01273 291058, email [john.peel@brighton-hove.gov.uk](mailto:john.peel@brighton-hove.gov.uk)) or email [democratic.services@brighton-hove.gov.uk](mailto:democratic.services@brighton-hove.gov.uk)

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# Brighton & Hove City Council

## Agenda Item 62

### Cabinet

**Subject:** Housing Strategy 2024-2029

**Date of meeting:** 26 September 2024

**Report of:** Cabinet Member for Housing & New Homes

**Contact Officer:** Interim Corporate Director for Housing, Care and Wellbeing – Housing Lead

**Tel:** 01273 293321

**Email:** martin.reid@brighton-hove.gov.uk

**Ward(s) affected:** All wards

**Key Decision:** Yes

**Reason(s) Key:** Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

**For general release**

#### **1. Purpose of the report and policy context**

- 1.1 The last housing strategy for Brighton & Hove was agreed in 2015 and expired in 2020. This report seeks the endorsement of the Cabinet for a new Housing Strategy 2024 to 2029 prior to its adoption by Full Council on 24 October 2024. An earlier draft strategy was considered by the Housing & New Homes Committee on 13 March 2024 prior to public consultation.
- 1.2 The draft Housing Strategy 2024 to 2029 sets out how we plan to improve housing outcomes against five priorities:
  - i. Improve housing quality, safety and sustainability
  - ii. Deliver the homes our city needs
  - iii. Prevent homelessness and meet housing need
  - iv. Promote improved health and wellbeing for all
  - v. Provide resident focused housing services
- 1.3 The draft housing strategy contributes to the delivery of all four strategic outcomes in the Council Plan 2023 to 2027. It contains actions that will help us create a city to be proud of, a fair and inclusive city, and a healthy city where people thrive. It also contributes to our goal of being a responsive council with well-run services.

## **2. Recommendations**

- 2.1 That Cabinet recommends the draft Housing Strategy 2024 to 2029 set out at Appendix 1 to go to Full Council for approval.
- 2.2 That Cabinet agrees the Year 1 Action Plan set out at Appendix 2.
- 2.3 That Cabinet receives a report on the delivery of the Housing Strategy 2024 to 2029 on an annual basis.

## **3. Context and background information**

- 3.1 Over the last decade Brighton & Hove has been significantly impacted by the national housing crisis. There is a shortage of homes which meet the needs of our residents and rents and house prices are increasing faster than incomes. Although we experience many of the same housing problems as elsewhere, there are additional pressures because of the city's unique character and history.
- 3.2 We know that we need to make the most of the housing that we already have. Around eighty per cent of the homes that will exist in 2050 have already been built. Many properties, across all types of tenure, need work to ensure that they are suitable, safe and sustainable, both now and in the future. There have also been major legislative and regulatory changes impacting social housing landlords following the Grenfell Tower tragedy. This means that the council must invest in improving the quality of its homes and estates and to prioritise building and fire safety improvements.
- 3.3 The private rented sector provides accommodation for a third of the city's households. We will continue to work with landlords to improve standards in the private rented sector, using our powers to enforce essential work where necessary.
- 3.4 Improved energy efficiency plays a major role in reducing the city's carbon footprint. It also reduces costs for households, helping tackle the cost-of-living crisis. We will invest in improving the energy efficiency of council homes and, where possible, support other residential property owners to make improvements.
- 3.5 Achieving the right mix of market and affordable housing types is a significant challenge for the city. Pressure on land for development is high and many potential sites are hard to develop. We want to increase the supply of high-quality homes that meet the needs of our communities. We will work to increase the number of affordable homes, in particular additional council homes, using the full range of levers at our disposal. We also want to create places where people are proud to live. As part of our programme to provide new homes we will incorporate the physical and social infrastructure for people to thrive. This includes working with our partners to achieve safe, healthy and inclusive neighbourhoods.
- 3.6 The Homelessness Reduction Act (2017) changed our legal duties towards households facing homelessness. We must increase our effectiveness in preventing homelessness and reduce the number of households in temporary and emergency accommodation. This is not only unsuitable for

many, but also places significant pressures on the council's budget. We have a duty to focus our assistance on people in urgent housing need, including those fleeing domestic abuse and people sleeping rough.

- 3.7 The city has seen an increase in people with more complex support needs, including the need for various forms of supported housing. This includes the growing number of older people, people with physical or learning disabilities, people with autism and people with mental health and substance misuse needs. Housing, adults and children's services and the NHS need to work better together to support people to be more resilient and as independent as possible. Through promoting healthy housing for our residents, the strategy contributes to the Council Plan priority of better health and wellbeing for all and reducing health inequalities.
- 3.8 The Council Plan commits us to becoming a responsive council with well-run services. The Social Housing (Regulation) Act (2023) regulates the activities of social housing providers including the council and sets standards for their conduct and performance. It aims to give tenants a real voice and requires landlords to be more transparent about their performance. This means we need to get better at listening to and engaging with our residents. We have work to do to ensure that our housing services are accessible, fair and inclusive. We are also clear that to deliver improved services and better housing outcomes we must collaborate with our local and regional partners.
- 3.9 The strategy and accompanying action plan outline the council's contribution to improving housing outcomes in the city, but it acknowledges that we cannot achieve this on our own. The strategy is also a call to action. We urge our partners, residents and communities to work with us to deliver our ambitious long-term vision of homes for everyone in Brighton & Hove.
- 3.10 The draft Housing Strategy 2024 to 2029 is at Appendix 1. It is accompanied by an action plan for the current financial year (Appendix 2). The action plan will be updated annually with the development of the action plan for 2025/26 scheduled to begin in the autumn. A progress report for 2024/25 will accompany the refreshed action plan for 2025/26. Key areas of progress to date on the Year 1 Action Plan are outlined below:

**Improve housing quality, safety and sustainability**

- £13.9 million allocated to health & safety improvements.
- Additional HMO licensing implemented July 2024.
- Selective licensing implemented in September 2024.
- 300 solar panels installed on council homes.

**Deliver the homes the city needs**

- Construction to begin on 294 new affordable homes to rent and 137 new homes in design phase.
- 20 long term empty homes back into use, on track to exceed target of 35.
- 54 homes being bought back into council ownership and 21 homes at St Aubyns approved.

**Prevent homelessness and meet housing need**

- New housing allocations policy to be approved.
- 55 vulnerable tenants helped to sustain their tenancy.
- New Supported Accommodation through Single Homelessness Pathway commissioned.
- 16/17 year-old and Care Leavers' Housing Protocols to be approved.

**Support improved health and wellbeing for all**

- Work started on 28 supported homes for people with acquired brain injury and/or physical disabilities.
- £3.97 million allocated for housing adaptations.

**Provide resident focused housing services**

- STAR survey of tenants & residents.
- Roll out of trauma informed practice training.
- 18 Local Authority Housing Fund units already secured, a bid for a further 25 units agreed.

3.11 The proposed priorities and areas for improvement in the draft strategy have been developed through cross-directorate engagement within the council and were tested earlier in the year with members of the Housing & New Homes Committee and policy committee chairs. We have also engaged with strategic partners, including registered social housing providers and local NHS trusts. Further engagement took place during eleven weeks of public consultation. A report on the main themes arising from the consultation and the council's initial response is at Appendix 3.

3.12 Sources of evidence used to produce the housing strategy include data from the Census, the Joint Strategic Needs Assessment, the Strategic Housing Market Assessment 2023, the STAR survey of council tenants, and a range of housing service and performance data. We have also drawn on evidence from relevant needs assessments and other plans and strategies. Consideration of the equality impacts of the proposed priorities and areas for focused action can be found in Appendix 4.

3.13 A report to the Housing & New Committee 13 March 2024, prior to public consultation, can be found on the council website [here](#).

**4. Analysis and consideration of alternative options**

4.1 The Deregulation Act (2015) repealed the Secretary of State's power to require local housing authorities in England to produce a housing strategy. The option of not producing a housing strategy was tested with members of the Housing & New Homes Committee and policy committee chairs. Members agreed to proceed with production of the strategy. The vision of the housing strategy is 'Homes for everyone'. An updated housing strategy and action plan is key to delivery of this Council Plan priority.

## **5. Community engagement and consultation**

- 5.1 Findings from council and partner consultation and engagement exercises were used to inform the development of an initial draft housing strategy. This included consultation and engagement on the Adult Learning Disability Strategy (2019), care needs assessment for adults under 70 (2019), older people's housing (2019), Homelessness & Rough Sleeping Strategy (2020), review of Area Panels (2022), the Autism Strategy (2023), Additional and Selective Licensing (2023), Community Safety Strategy (2023), the STAR survey of council tenants (2023), Antisocial Behaviour Strategy (in development), Violence Against Women and Girls Strategy (in development).
- 5.2 Formal consultation on the draft housing strategy ran for 11 weeks from 18 March to 2 June 2024. When the consultation closed, we had received 347 responses. Of these, 294 were from members of the public, including 265 from residents of the city. 53 responses were submitted on behalf of groups, networks and organisations. Most were received through Your Voice, the council's online consultation platform. A small number of responses were sent by email or post. For comparison purposes, 208 responses were received over a two-stage formal consultation on the Housing Strategy 2015 to 2020. Most of these were from professionals and organisations.
- 5.3 The consultation report at Appendix 3 summarises key themes and issues arising from the consultation. The consultation report also sets out the council's response to the feedback. There was strong support for the proposed priorities and areas for focused action. There was also detailed feedback on the content of the strategy. Action arising from this feedback has led to one or more of the following: feedback to consultees on work already underway; amendments to the draft strategy; inclusion of actions in the accompanying action plan; and identification of issues where the council may wish to lobby central government for additional powers or resources.

## **6. Financial implications**

- 6.1 Implementation of the Year 1 Action Plan for 2024/25 will need to be managed from the resources available during this financial year. The financial implications arising from the implementation of this strategy from 2025/26 onwards will need to form part of the budget setting processes and be managed within budget constraints. In addition, the strategy may have budgetary impact on other service areas across the council which will need to be quantified as the strategy is implemented. Significant elements of the strategy rely on financial and other resources from partners to ensure successful delivery, including but not limited to Homes England, MHCLG and the NHS.

- 6.2 The gross budgets for 20204/25 for both Housing General Fund services and Housing Revenue Account (HRA) are shown below:

<b>Housing General Fund Services</b>	<b>24/25 Gross Budget</b>
<b>Expenditure</b>	<b>£'000</b>
Adaptations	0.783
Homemove	0.130
Housing Options	3.113
Private Sector Housing	0.950
Rough Sleepers and Supported Housing	6.971
Strategy & Supply	0.241
Temporary Accommodation	26.527
Travellers	0.495
<b>Grand Total</b>	<b>39.211</b>

<b>Housing Revenue Account</b>	<b>2024/25 Gross Budget</b>
<b>Expenditure</b>	<b>£'000</b>
Housing Investment & Asset Management	5,664
Housing Management & Support	7,192
Housing Strategy & Supply	1,495
Repairs & Maintenance	18,648
Tenancy Services	14,864
Major repairs Reserve	16,516
Capital Financing Costs	8,825
Contribution to / (from) reserves	3,266
<b>Total Expenditure</b>	<b>76,470</b>

- 6.3 The 2024/25 HRA capital programme reflects the required investment in Health & Safety, Building Safety and Fire Safety compliance alongside the planned maintenance, improvement programmes, major capital projects to council housing as well as new supply projects, linking investment plans to the Housing Strategy. Implications arising from the strategy for 2024/25 will need to be managed within the resources approved for 2024/25. Capital budgets are reported to Cabinet as part of the council's Targeted Budget Management (TBM) process with variations reported and approved as part of the main TBM report. The budget setting cycle for 2025/26 will further reflect the required investment based on latest information provided through surveys and due diligence work being undertaken, the implications from the Housing Strategy will be included within the 2025/26 proposals.



- 6.4 New projects, in particular New Supply projects are bought to cabinet on a case-by-case basis when approved these are added to the HRA capital programme in year.
- 6.5 The total opening capital programme budget for 2024/25 is £89.735m, the breakdown of which is outlined in the table below.

Housing Revenue Account Capital Programme		Opening Budget £'000
Health & Safety		13,914
Major Works		19,495
Planned Works		8,463
Sustainability		9,275
Other		3,157
New Supply		35,431
Grand Total		<b>89,735</b>

Name of finance officer consulted: Monica Brooks      Date consulted 5 September 2024

## 7. Legal implications

- 7.1 Under Part 2A of the Council's constitution, adoption of the Housing Strategy is reserved to Full Council as part of the Policy Framework.

Name of lawyer consulted: Simon Court      Date consulted 20 August 2024

## 8. Equalities implications

- 8.1 The vision of the housing strategy is 'Homes for everyone'. This is derived directly from the Council Plan 2023 to 2027 and forms part of the council's vision for a 'Better Brighton & Hove for all'. It is anticipated that the housing strategy will lead to improved outcomes relating to the condition and supply of housing across the city as well as promoting resilience and improved health and wellbeing. The strategy also outlines the council's commitment to work with communities and a wide range of partners. Such partnership working is particularly important as the council only owns a small proportion of the city's housing stock.
- 8.2 The anticipated benefits are expected to particularly affect those who are currently not suitably housed. This includes many of those covered under protected characteristics as defined by the Equality Act (2010). It will also impact those with intersecting characteristics and people with care experience which the council has determined should be treated as a protected characteristic.

- 8.3 Consideration of the equality impacts of the proposed priorities and areas for focused action in the housing strategy is at Appendix 4. The Equality Impact Assessment contains 10 recommendations with associated actions cross referenced to the Action Plan.

## **9. Sustainability implications**

- 9.1 Housing is one of the largest contributors to the city's CO2 emissions. Reducing the energy used to build, heat and operate homes is key to achieving our Net Zero ambitions. The draft Housing Strategy includes measures to improve the energy performance of council homes, support property owners to improve their properties and to enforce energy performance standards in line with legislation. It also seeks to ensure that the delivery of new homes is resource efficient and has minimal impact on the natural environment and identify opportunities to enhance the environment.
- 9.2 Helping residents to live in well-insulated, efficiently heated, healthy council homes addressing fuel poverty issues remains a key long-term objective, which is supported through the HRA capital programme. The five-year programme sets out resources of £30.800m; an average investment of £6.160m per annum. This includes investment in making improvements to communal and domestic heating systems as well as identifying opportunities to install energy efficient & low carbon heating systems. The council's solar PV programme is also being taken forward.

## **10. Health and wellbeing implications**

- 10.1 Poor quality, unaffordable, inappropriate or lack of housing directly impacts people's ability to maintain their health, well-being and independence. Measures to improve housing quality, tackle health and safety hazards, improve the environment and increase community cohesion will have a positive impact on health and contribute to tackling health inequalities.

## **Other Implications**

## **11. Procurement implications**

- 11.1 The Best Value Duty requires the council to seek continuous improvement in the way it exercises its functions, considering a combination of economy, efficiency, and effectiveness. The draft strategy aims to maximise overall value, including social value through our procurement and other activities. We encourage the use of local suppliers and contractors as well as identifying other opportunities to add value, for example, our in-house repairs and maintenance service provides opportunities for work experience and apprenticeships to local people.

## **12. Crime & disorder implications:**

- 12.1 The strategy reinforces the continued need for services to support rough sleepers and those experiencing domestic abuse, and, on improving joint working with the police and other partners to ensure issues of harassment and hate crime are tackled effectively. It also identifies the need to create safe homes and neighbourhoods and to tackle crime and antisocial behaviour on our estates.

### **13. Conclusion**

- 13.1 The draft housing strategy has been amended following public consultation. An action plan for the current business year sets out more detailed measures to improve housing outcomes in the city. This report seeks support from the cabinet for the strategy, including aspects which require cross-directorate collaboration or work with external partners.

### **Supporting Documentation**

None

### **Appendices**

1. Housing Strategy 2024 to 2029
2. Action plan 2024/25
3. Consultation report
4. Equalities impact assessment



# Homes for everyone

Housing strategy 2024 to 2029

Brighton & Hove City Council

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# Foreword

Brighton & Hove is a city of huge ambition, fabulous diversity and significant opportunity. We want a city we can all be proud of, a city that is fair and inclusive and a healthy place where people can thrive. Homes for everyone is central to the council's vision for a better Brighton & Hove for all. It is also a call to action.

This housing strategy sets out our goal to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove. However, we recognise that we can't achieve this on our own. We have increasing demand for our services and a number of legal duties, but we also have shrinking resources. What we can do is provide leadership, build partnerships and encourage creative, bold and innovative solutions to the housing crisis.

Housing supply and affordability is a significant issue for the city, with many people unable to afford a mortgage or pay their rent. Some are forced to live in overcrowded or unsuitable conditions. Others must look outside the city to find homes that meet their needs.

We have a strong track record of delivering new homes that are genuinely affordable and built to high environmental standards. We also have an ongoing programme to improve our existing council homes and to ensure that all homes in the city are fit for purpose and sustainable.

Preventing and alleviating homelessness is a key statutory duty for the council. We will continue to do everything we can to make sure that people are treated fairly and with respect, whatever their housing situation. The most vulnerable deserve our support and we will always prioritise their needs. This includes support to access appropriate housing and to maintain independence and dignity.

We are committed to putting people at the heart of housing in the city. We want to work with our tenants and leaseholders to improve our housing services. We know that we don't always get things right, but we are determined to do our very best.

We are resolute in our ambition to achieve a better Brighton & Hove for all. The challenges ahead are significant, yet we are confident that the priorities set out in this strategy will help us deliver improved housing outcomes for the city.

The input of the city's residents and our partners has helped us shape this strategy. I am deeply grateful to those who have provided us with constructive feedback on earlier drafts. I look forward to working with you to deliver our ambitious plans.

Councillor Gill Williams

Cabinet Member for Housing and New Homes, Brighton & Hove City Council

# Introduction

The council plan 2023 to 2027 sets out a vision for a better Brighton & Hove for all. It outlines our missions to make the city fairer and more inclusive, a safer and healthier place to live, and deliver better services by putting residents at the heart of all we do.

This housing strategy outlines our housing priorities for the next 5 years and describes the steps we will take to deliver them. The strategy will guide our actions as a council and demonstrate to residents and our partners that we are serious about tackling the housing crisis in the city.

The housing strategy supports the delivery of the council plan. It also provides a framework for more detailed plans, including the Homelessness and Rough Sleeping Strategy, the Housing Allocations Policy, new housing supply and our housing asset management strategy. It connects to other major strategies and plans including the City Plan, Economic Strategy, the Joint Health and Wellbeing Strategy, Local Transport Plan and more.

The housing strategy is about more than council housing services. We want to shape and deliver a shared long-term agenda with our partners in the city and beyond and critically, with our residents and the wider community.

This is a high-level document that sets out the council's vision for housing in the city. The 5 priorities we have identified will help us focus our efforts to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove. As well as a Year 1 Action Plan to accompany the strategy, more detail on delivery will be set out in our operational plans. The scale and nature of future housing development will be set out in the forthcoming City Plan Part 1.

## Our strategic priorities

1. Improve housing quality, safety and sustainability
2. Deliver the homes our city needs
3. Prevent homelessness and meet housing need
4. Promote improved health and wellbeing for all
5. Provide resident focused housing services

In delivering our strategy we will strive to incorporate the following principles in everything we do.

## Principles

- Collaborate and innovate
- Invest in our existing homes
- Listen to our residents and treat people with respect
- Address diverse needs and provide fair access to services
- Take into account the climate and biodiversity crises
- Manage our budgets effectively and make best use of our resources

# The policy context

The council has a wide range of housing duties and responsibilities. These include allocating social housing, providing housing advice and information, preventing homelessness, and developing new housing to address local needs.

Since our last housing strategy was agreed in 2015, major changes in national housing policy have been introduced. The Homelessness Reduction Act (2017) significantly changed our legal duties towards households facing homelessness, with a greater emphasis on preventing homelessness. We responded, reviewing our homelessness and rough sleeping services and setting out plans for further change in a new Homelessness and Rough Sleeping Strategy 2020 to 2025. The Armed Forces Act (2021) placed a legal duty on local authorities to give priority for social housing to serving members of the armed forces, former service personnel and their family members.

The Grenfell tragedy in 2017 raised fundamental questions about fire and building safety. For landlords, developers and property owners, including local authorities, the Fire Safety Act (2021), Fire Safety (England) Regulations 2022 and Building Safety Act (2022) have introduced significant new regulations and new safety requirements, particularly in relation to high-rise residential property.

The Social Housing (Regulation) Act (2023) strengthens regulation of the activities of social housing providers and sets higher standards for the health & safety of homes as well as the conduct and performance of landlords. It aims to give tenants a real voice and requires landlords to be more transparent about their performance. In addition, we anticipate that, if enacted, the Renters' Rights Bill will extend protection for private rented sector tenants.

Delivering new, high-quality and affordable homes is a key priority for the council. It is also a national priority, with new and stretching development targets from central government. The council has a strong track record of delivering additional council homes and of successfully unlocking funding through the Homes England Affordable Homes Programme to help deliver our new build plans. We will actively seek other funding opportunities to purchase additional and build new homes for our city.

New housing duties have also been introduced to protect the most vulnerable. The Domestic Abuse Act (2021) requires local housing authorities to provide support and safe accommodation for victims of domestic abuse. The Supported Housing (Regulatory Oversight) Act 2023 aims to improve the quality of housing designed for vulnerable adults who need some level of support to live independently.

# What the data tells us

This is a snapshot of population and housing data at the time the strategy was agreed. More detailed information can be found in our [Joint Strategic Needs Assessment](#) and the [Strategic Housing Market Needs Assessment](#). Data from both have been used to inform the development of our strategic priorities.

In 2021, Brighton & Hove's population was 278,000

- 17% under the age of 16 compared with 21% in England
- 9% aged 19 to 22 compared with 5% in England
- 19% are 60+ compared with 25% in England

In 2021, there were 130,840 homes in the city

One in 3 households have at least one disabled member

7 neighbourhoods in the city are in the 1% most densely populated areas in England

37,000 students attend the city's 2 universities

There are more than 4,200 Houses in Multiple Occupation in the city

18.7% of residents aged 60+ living in income deprivation (England 14.2%)

One in 4 children living in poverty in Brighton & Hove (one in 3 in England)

33% of homes are rented privately (20% in England)

Brighton & Hove has around 11,900 council-rented homes

Over 7,500 households on the housing register in August 2024

More than 1,800 households in temporary and emergency accommodation in August 2024

£23.2 million cost of temporary and emergency accommodation in 2023/24

661 additional council homes 2015 to 2023

1,470 additional affordable homes 2015 to 2023

£421,950 average house price (August 2023)

Average house prices are 12.3 times average earnings in the city

Average private rent £1,300 per month in Brighton & Hove (September 2023 - £850 England, £1,050 South East)

[Table] Average rents - Room £607, Studio £814, 1 bed £1,025, 2 bed £1,375, 3 bed £1,790, 4 bed £2,500

58% of Brighton & Hove's housing was built before 1940

18% of private rented homes likely to have at least 1 serious hazard

472 households prevented from becoming homeless in 2023

52 people sleeping rough on official count night in November 2023

Brighton & Hove has 2,696 homes with support and 826 homes with care

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# **Priority 1: Improve housing quality, safety and sustainability**

## **Why this is important**

We need to make the most of the housing that we already have. Around 80% of the homes that will exist in 2050 have already been built. Many of these properties, across all types of tenure, need work to ensure that they are suitable, safe and sustainable, now and in the future. Some properties, however, have reached the end of their life and need to be renewed.

The council manages approximately 12,000 rented and 2,700 leasehold properties and we need to invest more, particularly in improving health and safety. We will prioritise investment in our buildings and in fire prevention, gas and electrical safety, asbestos, legionella and other health and safety risks such as damp and mould, to ensure safe, good quality council homes. Registered providers of social housing are subject to the same regulatory framework as the council and will be reviewing their investment priorities to meet the required standards.

The growth in the private rented sector in Brighton & Hove means that nearly one in 3 households in the city are renting privately. While most landlords operate responsibly, there are concerns that some do not. We will work with landlords to improve the management, standards and quality of homes in this key housing sector. Where appropriate, we will use our powers to enforce standards in the private sector.

Improved energy efficiency plays a major role in reducing the city's carbon footprint. It also reduces costs for households and helps tackle the continuing cost of living crisis. We will invest in improving the energy efficiency of council homes and, where possible, support other residential property owners to make improvements.

## **What we will do**

### **1.1 Improve the quality of council homes and estates**

- Provide an effective, efficient and timely repairs, maintenance and planned improvements service for our homes including moving toward a more planned, preventative model for maintaining and upgrading council homes.
- Carry out a programme of planned work to ensure that council homes are upgraded to agreed timescales.
- Continue to reduce the backlog of routine housing repairs.
- Develop and implement a new Housing Asset Management strategy to ensure we understand the condition of our homes and inform the delivery of our planned and major works programmes.
- Ensure that all council-owned homes meet the national Decent Homes Standard.

## **1.2 Prioritise building and fire safety improvements**

- Invest in building and fire safety to meet our new duties under the Building Safety Act 2022 and Fire Safety (England) Regulations 2022.
- Ensure that the council complies with health and safety requirements in all our homes.
- Ensure the council complies with the Social Housing (Regulation) Act 2023 and meets the Regulator of Social Housing consumer standard, including on safety and quality.

## **1.3 Improve standards in the private rented sector**

- Improve the condition of Houses in Multiple Occupation through the existing mandatory licensing of larger properties and introduce an additional licensing scheme for smaller properties.
- Introduce selective licensing schemes in areas of the city where the evidence supports it.
- Enforce minimum energy performance standards in the private rented sector in line with legislation.
- Work with landlords to identify and make improvements to their properties and, where appropriate, use our powers to enforce essential work.
- Prepare for expected changes in legislation to protect private sector tenants.

## **1.4 Improve sustainability and energy efficiency**

- Improve the energy performance of council homes through investment, including improvements to roofing, windows, doors, building fabric, heating and hot water systems and solar panels.
- Support private landlords and owner occupiers to improve the energy performance of their properties by promoting access to grant funding and signposting to home energy efficiency advice and support.
- Improve the sustainability of our housing by reducing our carbon footprint, minimising waste, adapting to climate change and enhancing biodiversity.

### **How we will measure progress**

Each year we will update on the following indicators

- % of routine council housing repairs completed on time
- % of council homes that meet the government's Decent Homes Standard
- Energy efficiency rating of council-owned homes
- Number of fully licenced properties within mandatory, additional and selective licensing schemes
- Number of fines issued for private rented homes that do not meet required EPC ratings

## Priority 2: Deliver the homes our city needs

### Why this is important

Good quality housing and infrastructure has a key role to play in improving quality of life, boosting the economy and making the city a place where people are proud to live.

Brighton & Hove is an expensive place to live and even some affordable homes are beyond the reach of many. We know that there is a shortage of housing suitable for families in the city. We are not helped by limited availability of land, competition for other land uses and the need to ensure we support facilities such as schools, health services, open space and transport infrastructure. High land values and the viability of development sites continue to present barriers to accelerated development. The planned refresh of the City Plan Part 1 gives us the opportunity to address these issues and set new goals for housing development.

The city has two universities with 37,000 students. The growth in purpose-built student accommodation has encouraged a better balance of student housing and we will continue to support the development of safe, high quality and affordable student housing.

We can't overcome the mismatch between supply and demand, but we can focus on providing more council and other affordable housing either through our own new build programmes, partnership initiatives, developer contributions or registered providers. To truly make a difference, we know we need more affordable housing options, from council homes on social rent to home ownership. We also need a range of options for our diverse population, including homes which can be adapted to changing needs, temporary and supported accommodation and suitable provision for marginalised groups and households with higher levels of need. Using the council's own assets and resources and prioritising brown field sites to bring forward new homes is key to successful delivery.

We need to continue with our successful work to convert private housing into council housing through buy back and other acquisition programmes. As part of our ambitious plans to provide new homes, we will incorporate the physical, social and green infrastructure needed for communities to thrive. Our developments will be sustainable, keeping costs down and reducing impact on the environment.

### What we will do

#### 2.1 Increase the supply of high-quality homes that meet the needs of our communities

- Work with partners to ensure there are new homes that meet the needs of residents.
- Review our housing development targets through the refresh of the City Plan.
- Seek a balanced mix of property sizes and tenures appropriate for the future needs of the city, including family housing and homes that can be adapted to changing requirements.
- Identify opportunities to develop new sites, including opportunities for developing and regenerating council-owned land and assets.



- We will be innovative, including using modern methods of construction and building partnerships to design creative solutions.
- Design new homes that are easy to maintain and manage and meet the highest environmental and sustainability standards.
- Build a range of adaptable and specialist homes to meet people's changing needs throughout their lives.
- Work with the city's further and higher education sector to assess future demand and potential locations for new student accommodation.
- Encourage sustainable and flexible design of student accommodation to enable it to be repurposed for other uses if appropriate.

## **2.2 Increase the supply of affordable homes**

- Increase the number of new affordable homes delivered by the council and other providers of affordable housing, with at least 2,000 affordable homes delivered during the lifetime of this strategy Buy back council homes lost through the right to buy and consider the acquisition of other homes where economically viable.
- Deliver lower cost and council homes through our partnership 'Homes for Brighton & Hove'.
- Develop a protocol setting out how the council will work with developers to maximise the provision of affordable housing.
- Increase options for low cost, affordable ownership through First Homes and other shared ownership schemes as a route to affordable housing for essential workers.
- Use local criteria for access to affordable housing provided through Build to Rent schemes to ensure prioritisation of local people on lower incomes, essential worker roles that are hard to recruit or retain and disabled people.
- Review the Transfer Incentive Scheme to address under-occupation and ensure that people are in homes that meet their needs.

## **2.3 Create places where people are proud to live**

- Through the City Plan, our planning service will make sure that new homes for everyone are well designed, good quality and sustainable.
- We will work with residents to make sure that spaces and places are designed to support and strengthen all our different communities.
- Ensure our housing estates are clean and well maintained.
- Explore options to reduce short-term lets.
- Apply a Council Tax premium on second and long-term empty homes to encourage owners to bring them back into use.
- Work with property owners to bring long-term empty housing back into use.

### **How we will measure progress**

Each year we will update on the following indicators

- Number of additional council homes delivered (new build, acquisitions and conversions)
- Number of additional affordable homes delivered by Registered Providers
- % of affordable homes achieved in new housing developments

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## **Priority 3: Prevent homelessness and meet housing need**

### **Why this is important**

More of our residents are facing severe and challenging housing needs. The increasing costs of housing, ending of tenancies, changes in national policy and a shortage of genuinely affordable housing have led to an increase in the number of households at risk of homelessness.

Our approach is to prevent homelessness before people become homeless. We recognise that tackling and preventing homelessness requires a holistic approach that goes beyond council housing services. We will work with individuals, families, landlords, other council services, public sector bodies and the Third Sector to prevent and alleviate homelessness. Our Homelessness and Rough Sleeping Strategy outlines our approach in more detail.

The number of households living in temporary and emergency accommodation has risen to unprecedented levels. Temporary and emergency accommodation is expensive. It is also insecure and may feel unsuitable for many placed there. We know that the experience of living in temporary or emergency accommodation has a negative impact on children and vulnerable adults.

There is a high demand for housing from people in urgent housing need, including those fleeing domestic violence, vulnerable families, refugees and asylum seekers, and people with complex needs. We will ensure that in responding to urgent need we will tailor our response to ensure fair access to support and services. We will work with our partners to review and improve our support for rough sleepers in response to increasing complexity of need.

### **What we will do**

#### **3.1 Increase our effectiveness in preventing homelessness**

- Deliver an improved homelessness service through the homelessness transformation programme to focus on the needs of clients.
- Work with partners to educate and increase awareness of homelessness prevention and housing options.
- Encourage people to access our support services early to help prevent them becoming homeless.
- Support people to maintain their tenancies and offer advice and assistance to prevent them becoming homeless.
- Use our allocations policy to support the prevention or relief of homelessness.

#### **3.2 Reduce the number of households in temporary accommodation**

- Review the housing allocations policy to ensure that allocations are fair and give all communities reasonable access to our housing.

- Reduce our overall use of temporary and emergency accommodation.
- Use the Private Rented Sector Offer Policy where suitable and appropriate.
- Convert temporary accommodation to assured shorthold tenancies where suitable and appropriate.
- Improve the temporary and emergency accommodation offer in the city.

### **3.3 Focus our assistance on people who need most help**

- Support rough sleepers to access services and accommodation.
- Work with our partners to improve the join up between the council's homelessness services and homeless healthcare services
- Commission supported and accessible accommodation to meet the needs of vulnerable households.
- Work with our social care and health colleagues to address the housing and support needs of those in urgent housing need.
- Develop joined up approaches for those most at risk of harm or where there is greater impact if they become homeless.

#### **How we will measure progress**

Each year we will update on the following indicators

- % of homelessness cases presenting during the prevention duty stage
- % of homeless prevention cases closed with a successful prevention outcome
- Total number of households in temporary accommodation
- Number of verified rough sleepers
- % of people feeling safe after leaving refuge
- Take up of housing options

# **Priority 4: Promote improved health and wellbeing for all**

## **Why this is important**

The quality, location and cost of our homes play a role in our overall wellbeing, underpinning our health, relationships, security, and the environment around us. Ensuring people have appropriate, good quality housing can increase their resilience, help them retain their independence, and promote their health and wellbeing for longer. It can help delay or reduce their need for social care and health services in the future.

The place we call home extends beyond the walls of our house or flat. Safe, healthy and inclusive neighbourhoods are critical for wellbeing. Safe neighbourhoods allow residents to live free from fear and anxiety. Healthy neighbourhoods provide easy access to green spaces, healthy food options and opportunities for physical activity. Inclusive neighbourhoods embrace diversity and foster a sense of belonging and connection.

The council is corporate parent to around 360 children and young people. Like any parent, we have a role to play in supporting them secure appropriate accommodation and become independent as they move into adulthood.

Disability and physical health needs can restrict the ability to live independently without support. Our disabled facilities grant scheme helps people remain in their home for longer and has a significant impact on wellbeing and quality of life. We also plan to make better use of assistive technology to support residents to live at home.

There is a wide range of supported and specialist accommodation in the city, but we need to ensure we are providing the right accommodation and support to people with specific or complex needs. This includes, but is not limited to, care leavers, recent prison leavers, vulnerable parents and children, people with a learning disability, people with autism and those with substance dependence or mental health issues. Our seniors housing accommodation offer must also develop to fit the changing needs of our ageing population.

## **What we will do**

### **4.1 Work with residents and our partners to develop safe, healthy and inclusive estates and neighbourhoods**

- Involve residents and community organisations in the design and oversight of safe housing and estates.
- Use our estate investment and development budgets to invest in environmental and communal area improvements on our estates, based on resident priorities.
- Work with residents and our partners to deter and tackle anti-social behaviour, domestic abuse and hate crime on our estates and council homes.

- Increase our support to more vulnerable clients and communities in our council homes.
- Move to more proactive tenancy and estates management including tenancy visits and estate inspections.

## **4.2 Support people to live independently**

- Support people to live independently through investment in adaptations to existing homes.
- Review our approach to understanding and responding to older people's housing needs, including seniors and retirement housing.
- Review the provision of exempt supported accommodation in the city and develop a Supported Housing Strategy to ensure we meet the needs of vulnerable households who need our services.
- Commission supported housing which addresses the needs of people with complex needs.
- Deliver new supported housing for people with physical disabilities.
- Prioritise support for the most vulnerable households to help them manage their tenancy, prevent debt and remain in their homes.
- Continue to improve our work across housing, adults' and children's services to design and commission services jointly.
- Take forward jointly agreed actions in our learning disability, autism and mental health housing action plans.
- Provide accessible information and advice to people who want to find accommodation which is best suited to their needs.

## **4.3 Promote healthy housing for our residents**

- Prioritise dealing with damp and mould and other health hazards in our council homes and the temporary accommodation we use.
- Promote opportunities for improving energy efficiency so that people's homes are adequately heated and properly ventilated.
- Take action to reduce overcrowding and ensure privacy.
- Ensure sufficient amenity space is delivered on new housing developments.

### **How we will measure progress**

Each year we will update on the following indicators

- Planned moves from supported accommodation
- Unplanned moves and evictions from supported accommodation
- Private sector housing – average weeks taken to approve Disabled Facilities Grant applications
- Council housing – average weeks taken to approve applications for major adaptations
- Number of tenants supported through our tenancy sustainment service

# Priority 5: Provide resident focused housing services

## Why this is important

We are determined to ensure that residents in our homes are safe, are listened to, live in good quality housing and have access to redress when things go wrong. Following the 2017 Grenfell Tower fire, new legislation affecting all social landlords has established a Regulator of Social Housing. The Social Housing (Regulation) Act 2023 requires the council and other social landlords to fully meet and ensure compliance with the new regulatory framework.

We are committed to achieving equitable outcomes for residents by providing fair access to services and meeting the diverse needs of our communities. This means listening to people and acting on what they tell us. It also means treating people fairly and with respect. Our Engagement Framework, Accessible City Strategy and Anti-Racism Strategy guide our approach.

To turn our aspirations into reality we know that we must innovate, as well as draw on evidence of what works from elsewhere. We must make the most of our own and external sources of funding and work collaboratively with our partners on joint priorities, sharing information about our assets and investment plans to ensure alignment with the needs of the city.

## What we will do

### 5.1 Listen to and engage with our residents

- Broaden and strengthen engagement with council tenants and leaseholders by providing a range of opportunities to engage more diverse voices.
- Implement the council's Engagement Framework and provide fair and accessible opportunities for people to influence decisions on issues which affect them.
- Improve our processes and systems for handling resident complaints to ensure they are addressed fairly, effectively and promptly.
- Work with people with lived experience to design improved housing pathways and services.
- Capture learning from complaints to identify issues and help us improve our performance and people's experience of using our services.
- Communicate clearly and provide information so that people understand what they can expect from us.
- Collect and share information about our performance

### 5.2 Ensure our housing services are accessible, fair and inclusive

- Take action to deliver equitable outcomes and fair access to our services.

- Collect and use information and data to help us better understand and respond to the diverse needs of our residents, including those arising from protected characteristics, language barriers and additional support needs.
- Optimise the local benefits and social value of our inhouse repairs and maintenance service.
- Support social value and community wealth building through our contracts and the procurement of major works.
- Recruit and retain staff from all the city's communities to ensure a fair and inclusive workplace and ensure our workforce reflects the community we serve.

### **5.3 Deliver effective, high quality housing services**

- Continue to improve resident focused local housing management services in line with local priorities.
- Increase our use of data and technology to manage council properties more effectively and improve our services to residents.
- Ensure that our housing workforce has the relevant skills and competencies to deliver an effective service to residents, including training in anti-discriminatory and trauma informed practice for frontline staff.

### **5.4 Work with our partners to agree and deliver shared priorities**

- Cooperate with our partners to promote social, environmental and economic wellbeing in our estates and neighbourhoods.
- Develop and deliver integrated services at a neighbourhood level.
- Design services to address the needs of our most vulnerable residents, including people with multiple and compound needs.
- Learn from others and share good practice by engaging with regional and national networks of housing authorities and providers of social housing.
- Proactively engage with regulatory bodies.

### **How we will measure progress**

Each year we will update on the following indicators

- Complaint responses within 10 working days
- Calls answered by Housing Customer Services
- Surveyed tenants satisfied with repairs (standard of work)
- Surveyed tenants satisfied with repairs (customer service)
- % of rent collected from current tenants of council homes



## Delivering the strategy

The housing strategy and its priorities are complemented by linked and supporting strategies and plans which set out in more detail what we will deliver. These include the City Plan, the Economic Strategy, the Homelessness and Rough Sleeping Strategy and the Joint Health and Wellbeing Strategy.

Plans to improve the council's effectiveness and to modernise our ways of working, are set out in our Customer Experience Strategy, Business Framework, Our People Strategy, the ICT and Digital Strategy, and corporate modernisation programmes. Our Anti-Racism Strategy and Accessible City Strategy aim to create cultural change and lead to more equitable ways of working and delivering our services.

Directorate and service plans provide details of the key actions, projects, timeframes, and measures that support the delivery of the housing strategy. These are updated annually.

The Housing Revenue Account contains the income and expenditure relating to the council's social landlord duties. It is a ring-fenced budget that covers the management and maintenance of council-owned housing stock. It includes substantial investment in building, health and fire safety compliance and in anticipation of the strengthened role of Regulator of Social Housing, ensuring adherence to their consumer standards. The budget also continues to support investment in new housing supply and sustainable homes as well as in the work of our housing services. Housing services are also funded by the General Fund and through grants from external funding bodies.



ID	Strategic Action	Deliverables / Milestones	Housing strategy focus area	Council plan priority	Lead Officer(s)
<b>Priority 1. Improve housing quality, safety and sustainability</b>					
HS01	Ensure the council complies with Social Housing Regulation Act 2023 and meets the four consumer standards that underpin the legislation.	Continue engagement with regulator in relation to compliance against the consumer standards and support further action if required - collate evidence to demonstrate compliance - improvement plans are delivered on schedule for each of the four consumer standards	1.1 Improve the quality of council homes and estates	Improve housing quality, safety and sustainability	Head of Tenancy Services
HS02	Provide a repairs and maintenance service for council owned housing	- Reduce / end backlog of routine repairs - Remodel the existing contractor framework by August 2024. - Deliver action plans aligned to key priority actions in the Housing Health & Safety Action Plan 2024/2025 for electrics by March 2025. - Deliver planned works for cold water service replacement ongoing (5 year plan) - Undertake more planned maintenance/rolling upgrade of stock including completing conditions survey of cold water main and electrical main service in high rise buildings and begin at least one other project	1.1 Improve the quality of council homes and estates	Improve housing quality, safety and sustainability	Head of Housing Repairs & Maintenance
HS03	Invest in building and fire safety to meet new duties under the Building Safety Act and new Fire Safety (England) Regulations and ensure we are compliant with Health & Safety.	- Deliver action plans aligned to key priority actions in the Housing Health & Safety Action Plan 2024/25 for gas, electric, water, asbestos, lifts, and fire risk by March 2025 - All major refurbishment works to comply with Fire Safety and Building Safety Registration national requirements and to be registered with the Building Safety Regulator as part of the project - Review capacity requirements and procurement options by August 2024	1.2 Prioritise building and fire safety improvements	Improve housing quality, safety and sustainability	Head of Housing Investment & Asset Management
HS04	Deliver planned and major works capital programmes	Implement the five-year programme for planned and major works Updated Asset Management Strategy to be agreed by March 2025	1.2 Prioritise building and fire safety improvements	Improve housing quality, safety and sustainability	Head of Housing Investment & Asset Management
HS05	Improve the condition of private rented sector accommodation	Additional Licensing Scheme (citywide) introduced 1 July 2024 Selective Licensing Scheme (4 wards) introduced 2 September 2024 Application to Secretary of State for 13 ward Selective Licensing Scheme March 2025 Take enforcement action where appropriate	1.3 Improve standards in the private rented sector	Improve housing quality, safety and sustainability	Head of Housing Strategy & Supply
HS06	Work with partners to provide advice and support to residents on home energy efficiency.	Work with Energyworks and the Local Energy Advice Partnership to provide energy advice, home energy checks, money advice and fuel vouchers for vulnerable residents in urgent need Deliver Warm, Safe Homes Grant programme for home owners and private sector tenants on low incomes who are struggling to keep their homes warm.	1.3 Improve standards in the private rented sector	Improve housing quality, safety and sustainability	Head of Housing Investment & Asset Management Head of Housing Strategy & Supply

HS07	Improve the energy performance of council homes	<ul style="list-style-type: none"> <li>- Solar PV – 220 – 450 installs in 2024-25 dependent on budget approval</li> <li>- Decarbonise heating hot water – technical surveys with outline options appraisals carried out on all communal heating and hot water systems in 2024, leading to a decarbonise programme being in place from 2025 onwards</li> <li>- Planned programmes (doors, windows, roofing, external decorations including insulation) – delivery of planned programmes, enhance the external decs. Programme to include cavity wall surveys on all jobs to identify opportunities to install replace failed CWI, explore external funding opportunities for these works</li> <li>- Delivery of project FLASH in partnership with EDF – funded by DESNZ to install and trial 25 domestic batteries alongside solar PV systems</li> <li>- Explore opportunity to bid for Social Housing Decarbonisation Fund to fund measures in hard to treat, low EPC rated homes</li> <li>- Delivery of a revised HRA Energy Strategy aligned to a revised Asset Management Strategy to set out opportunities and outline action plan aligned to the city wide Zero Carbon targets</li> </ul>	1.4 Improve sustainability and energy efficiency	Improve housing quality, safety and sustainability	Head of Housing Investment & Asset Management
<b>Priority 2. Deliver the homes our city needs</b>					
HS08	Set new housing development targets through the City Plan, shape development and design of land use and the city's built environment, including delivery of infrastructure to meet the city's needs.	<p>Key Issues Consultation Autumn 2024 - early engagement on key housing issues the plan needs to address</p> <ul style="list-style-type: none"> <li>- identifying the housing target set for the city under the draft National Planning Policy Framework and options for accommodating additional housing development in the city</li> <li>- identify future need for affordable homes.</li> </ul>	2.1 Increase the supply of high-quality homes that meet the needs of our communities	Increase housing supply	Head of Planning
HS09	Reduce the number of private sector long-term empty homes in the city	<p>Establish strategic partnership to strengthen collaborative working</p> <p>Review and make use of all powers available for BHCC to bring Empty Homes back into use</p> <p>Bring 35 long term empty homes (2 years plus) back into use by March 25</p> <p>Minimum 5% reduction in long term empty homes measured via New Homes Bonus calculation in Oct 24</p> <p>Empty Property Working Group to develop new protocols by March 25</p>	2.1 Increase the supply of high-quality homes that meet the needs of our communities	Increase housing supply	Head of Housing Strategy & Supply

HS10	Increase supply of affordable homes - rented and low cost ownership	<ul style="list-style-type: none"> <li>- 78 additional council homes delivered by the council (new build, acquisitions &amp; conversions) by March 2025</li> <li>- Deliver Year 1 of the Local Authority Housing Fund (phase 3) programme</li> <li>- 357 affordable homes due to be delivered in 2024/5 by Registered Providers and Build to Rent developers</li> <li>- Support planning policy to enable the provision of non-council affordable housing supply in the city</li> <li>- Review existing council assets to establish the best opportunities for developing more affordable homes</li> <li>- Moulsecoomb Hub contractor appointed by October 2024</li> <li>- Cabinet agreement on next site for Homes for Brighton &amp; Hove</li> <li>- Future sites secured through Homes for Brighton &amp; Hove to achieve 1,000 new homes over the lifetime of the project</li> <li>- New Homes for Neighbourhoods programme in 24/25 - on site at Hollingbury Library site (9 homes) and procured contractors for the following projects - Windlesham House (15 homes), Portslade Village Centre (28 homes), Rotherfield Crescent (3 homes) and Eastergate Road (30 homes)</li> <li>- maximise use of 'meanwhile' sites for modular and other innovative forms of housing whilst awaiting longer term development</li> </ul>	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Housing Strategy & Supply / Head of Regeneration
HS11	Create new social housing lets by reducing under occupancy	<ul style="list-style-type: none"> <li>- Develop an under-occupancy process for council housing by March 2025</li> <li>- Work with Registered Providers to develop a wider under occupancy approach</li> </ul>	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Tenancy Services
HS13	Reduce the number of short-term lets and second homes in the city.	<ul style="list-style-type: none"> <li>- Prepare for potential changes in legislation in relation to short term lets</li> <li>- assess other options available to tackle short term lets where appropriate</li> <li>- prepare to introduce a 100% Council Tax premium on second homes with effect from 5 April 2025</li> </ul>	2.2 Increase the supply of affordable homes	Increase housing supply	Head of Housing Strategy & Supply Head of Planning
<b>Priority 3. Prevent homelessness and meet housing need</b>					
HS14	Implement the Homelessness Transformation Strategy - improving the customer journey for people facing homelessness and maximising opportunities to prevent homelessness	- Align service with the aims of the city's Multiple Compound Needs programme	3.1 Increase our effectiveness in preventing homelessness	Improve housing support for residents	Head of Homelessness & Housing Options
HS15	Reduce the number of households in temporary accommodation	<ul style="list-style-type: none"> <li>- Deliver actions identified in the Temporary Accommodation Reduction action plan</li> <li>- develop further proposals as part of the refresh of the homelessness &amp; rough sleeping strategy by March 2025</li> </ul>	3.2 Reduce the number of households in temporary accommodation	Improve housing support for residents	Head of Temporary & Supported Accommodation
HS16	Implement a new Housing Allocations Policy.	<ul style="list-style-type: none"> <li>- Final proposal for Allocations Policy completed by August 2024</li> <li>- New Allocations Policy agreed by cabinet by September 2024</li> <li>- New Allocations Policy adopted by November 2024</li> <li>- New Allocations Policy implemented including all systems change by March 2025</li> </ul>	3.2 Reduce the number of households in temporary accommodation	Improve housing support for residents	Head of Homelessness & Housing Options

HS17	Review and update the Homelessness and Rough Sleeping Strategy	<ul style="list-style-type: none"> <li>- Refresh Homelessness and Rough Sleeping partnership arrangements by Sep 2024</li> <li>- Revise existing action plan by Dec 2024</li> <li>- Develop &amp; agree new strategy by March 2025</li> <li>- Through the strategy refresh align with the aims of the city's Multiple Compound Needs programme</li> </ul>	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Homelessness & Housing Options
HS18	Commission single homelessness and rough sleeper supported accommodation.	<ul style="list-style-type: none"> <li>- Monitor new contract to ensure delivery</li> <li>- Review performance and address any issues</li> </ul>	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Temporary & Supported Accommodation
HS19	Develop joined up approaches for those most at risk of harm or where there is greater impact if they become homeless	<ul style="list-style-type: none"> <li>- Agree the 16 to 17 Joint Protocol for homeless young people</li> <li>- Review our provision for pregnant single women</li> <li>- Provide support and safe accommodation for survivors of domestic abuse</li> <li>- develop Pan Sussex reciprocal arrangements for survivors of domestic abuse</li> <li>- develop a VAWG resource toolkit for frontline staff</li> </ul>	3.3 Focus our assistance on people who need most help	Improve housing support for residents	Head of Homelessness & Housing Options Head of Temporary & Supported Accommodation Regulatory Services & Safer Communities Manager AD Children's Safeguarding
HS20	Support and resettle refugees	<ul style="list-style-type: none"> <li>- deliver our commitments as a City of Sanctuary</li> <li>- Support the Refugee Resettlement Programmes including identifying suitable properties in the private rented sector</li> <li>- other properties to be acquired through the Local Authority Housing Fund in 2024/25</li> <li>- meet our goal of resettling at least 40 households (184 individuals) over the the duration of the Afghan programmes (2021 to 2025) by the end of March 2025</li> </ul>	5.2 Ensure our housing services are accessible, fair and inclusive	Work to reduce inequality	Head of Housing Strategy & Supply Head of Communities, Equalities & Third Sector
<b>Priority 4. Support improved health and wellbeing for all</b>					
HS21	Ensure that people can live in safe and well-maintained neighbourhoods and feel safe in their homes	<ul style="list-style-type: none"> <li>- work to align neighbourhood housing teams and health and social care integrated community teams</li> <li>- consult on new Hate Incidents Policy for council tenants and leaseholders Autumn 2024</li> <li>- identify and target geographical ASB hot spots</li> </ul>	4.1 Work with partners to develop safe, healthy and inclusive estates and neighbourhoods	Create safe public spaces that are accessible for all	Head of Tenancy Services Regulatory Services & Safer Communities Manager
HS22	Support older people to be independent and resilient	<ul style="list-style-type: none"> <li>- Increase referrals to preventative health and wellbeing services.</li> <li>- Increase use of assessment tools to support older people to live independently such as the falls prevention toolkit.</li> <li>- Increase the number of people applying for and being supported into sheltered housing and extra care.</li> </ul>	4.2 Support people to live independently	A healthy city where people thrive.	Head of Tenancy Services Head of Commissioning
HS23	Support people with additional support needs to be independent and resilient.	<ul style="list-style-type: none"> <li>- Deliver Move On Project action plan for 2024/25</li> <li>- Deliver the elements of the learning disability strategy housing action plan, autism action plan and mental health action plan where resources have been committed by partners and seek further resources where these are not available.</li> <li>- Undertake construction of Brickfields, Hove. To be completed March 2026</li> <li>- Develop and agree joint Housing Protocol for Care Leavers ensuring this is aligned with Best Practice Guidance by October 24</li> </ul>	4.2 Support people to live independently	Improve housing support for residents	AD Commissioning & Partnerships Head of Regeneration Head of Disability Services AD Children's Safeguarding

HS24	Develop a Supported Housing Strategy to ensure we meet the needs of vulnerable households who need support.	-Review provision of exempt supported housing - Identify resources to develop & agree strategy - Support registered charities to claim Housing Benefit subsidy for exempt accommodation	4.2 Support people to live independently	Improve housing support for residents	Head of Housing Strategy & Supply AD Commissioning & Partnerships
HS25	Enable people to live independently in their homes by providing housing adaptations	Provide and deliver adaptations for those in need - £3.97m of investment in 2024/25 (£1.6m for council owned homes and £2.37m for privately owned homes	4.2 Support people to live independently	Improve housing support for residents	Head of Housing Strategy & Supply
HS26	Tackle damp and mould	- implement new damp & mould protocol - raise tenants awareness of damp & mould and the support available - tackle damp & mould in council owned properties - advise private sector landlords of their current responsibilities & take enforcement action where necessary - prepare for the anticipated extension of Awaab's Law to the private rented sector	4.3 Promote healthy housing for our residents	Improve housing quality, safety and sustainability Enable people to live healthy, happy and fulfilling lives	Head of Housing Repairs & Maintenance Head of Housing Strategy & Supply
HS27	Work to ensure that people's homes are adequately heated and properly ventilated	Deliver the Warmth for Wellbeing public health programme, providing money advice, small grants and home energy visits Review and update the Fuel Poverty & Affordable Warmth (FPAW) Plan	4.3 Promote healthy housing for our residents	Improve housing quality, safety and sustainability Enable people to live healthy, happy and fulfilling lives"	Consultant in Public Health
<b>5. Provide resident focused housing services</b>					
HS28	Ensure that tenants' views are at the heart of decision-making about the delivery of our landlord services.	- take a resident centred approach to developing future options for the regeneration of LPS blocks - Consultation and implementation of Building Safety Regulator High Risk Blocks Resident Engagement Strategy - complete review of existing community engagement framework - Quarterly Area Panel meetings - strengthen use of non-traditional engagement methods (e.g. surveys, focus groups & social media) to improve engagement, inclusion and accessibility - engage and consult residents on policy and proposals; reviews for example, hate incidents policy, laundry review; budget priorities <del>- repeat annual STAR survey to assess tenant</del>	5.1 Listen to and engage with our residents	Meet the needs of our residents and other customers	Head of Tenancy Services
HS29	Optimise the local benefits and social value of our inhouse repairs and maintenance service.	- Mobilise the new materials supplier to replace existing arrangements to deliver benefits in the following key areas: availability, logistics, best value, sustainability, and social value - Maintain our apprentice promise to engage 20 apprentices at any one time. - Provide a local schools offer for work experience and longer placements to enhance employment skills and opportunities. - Continue to incorporate recruitment practices identified in the directorates Fair and Inclusive Action Plan to ensure that the workforce reflects the city's diverse communities	5.2 Ensure our housing services are accessible, fair and inclusive	Work to reduce inequality	Head of Housing Repairs & Maintenance
HS30	Provide housing information and advice appropriate to the needs of our diverse communities	- include information on access to housing on the Easy Read Hub - review the customer journey and information on housing services webpages	5.2 Ensure our housing services are accessible, fair and inclusive	Meet the needs of our residents and other customers	Assistant Director Housing Needs & Supply Assistant Director Housing Management

HS31	Ensure that our housing workforce has the relevant skills and competencies to deliver an effective service to all residents.	<ul style="list-style-type: none"> <li>- Continue to roll out training and support to develop trauma informed practice in our front line staff</li> <li>- Increase frontline staff understanding of supporting people with learning disabilities and people with autism in mainstream housing and support services through training</li> </ul>	5.3 Deliver effective, high quality housing services	Improve housing support for residents Our ways of working	Assistant Director Housing Needs & Supply Assistant Director Housing Management
HS32	Work with other social landlords to share intelligence, pool resources and work on shared priorities.	<ul style="list-style-type: none"> <li>- Establish Brighton Hove Social Landlord Network</li> <li>- Organise Housing Summit for October 2024 and agree shared priorities</li> <li>- Agree and implement a Preferred Developer Partners Charter</li> </ul>	5.4 Work with our partners to agree and deliver shared priorities	Improve housing quality, safety and sustainability Increase housing supply Improve housing support for residents	Head of Tenancy Services
HS33	Work with NHS and other partners to improve services and support for people with multiple, compound needs	<ul style="list-style-type: none"> <li>- Develop &amp; agree business case</li> <li>- Implement integrated community teams model by November 2024</li> <li>- begin consultation on proposals for integrated multiple compound needs service by March 2025</li> <li>- continue to develop proposals for a homeless health hub</li> </ul>	5.4 Work with our partners to agree and deliver shared priorities	Improve housing support for residents	Programme Director - Integrated Service Transformation
HS34	Work with our partners in the Third Sector, other public sector bodies, people with lived experience and the wider community to address homelessness and rough sleeping in the city.	<ul style="list-style-type: none"> <li>- Review &amp; refresh existing partnership arrangements</li> <li>- Develop and agree joint priorities through the development of a new homelessness &amp; rough sleeping strategy</li> </ul>	5.4 Work with our partners to agree and deliver shared priorities	Improve housing support for residents	Head of Homelessness & Housing Options



# Draft housing strategy 2024 to 2029

## Consultation report



## 1. Introduction

This report summarises findings from the public consultation on *Homes for everyone – draft housing strategy for consultation*. The consultation focused on the five proposed priorities and areas for action in the draft strategy.

The proposed priorities are as follows:

1. improve housing quality, safety and sustainability
2. deliver the homes our city needs
3. prevent homelessness and meet housing need
4. support independence and improved health and wellbeing for all
5. provide resident focused housing services

The consultation ran for 11 weeks from 18 March to 2 June 2024.<sup>1</sup> When the consultation closed, we had received 347 responses. Of these, 294 were from individuals, including 265 from residents of the city. 53 responses were received on behalf of groups, networks and organisations. Most were submitted online through Your Voice, the council's consultation platform. A small number of responses were sent by email or post.

We received many detailed responses and have therefore grouped feedback into themes. Section 2 summarises key themes and issues arising from the consultation.<sup>2</sup> These reflect the views and opinions of those who responded to the consultation and do not represent the position or policies of the council. Whilst there was broad support for the proposed priorities and areas for action, there were different, sometimes conflicting, views on how the council should take them forward. Respondents also highlighted gaps and areas where they thought the strategy could be improved. We are not able to respond here to every point made, but we will share the detailed feedback with relevant council officers and use this information to inform our action and service planning.

Section 2 also sets out the council's response to the feedback themes and identifies how we plan to take forward key issues. Action arising from feedback is likely to include one or more of the following: amendments to the strategy itself; inclusion of more detail on deliverables and targets in an accompanying action plan; feedback on work already underway; and discussion with elected members of the council on issues where the council does not have the power or the resources to act, but where it may wish to lobby central government for those powers or resources to be granted.

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<sup>1</sup> At the request of members of the Learning Disability Partnership, the original closing date of 19 May was extended to give more time to consult with people with a learning disability.

<sup>2</sup> Thematic analysis was undertaken with the support of the Your Voice artificial intelligence (AI) feature. The AI analysis was moderated by two members of the housing strategy project group, with the themes reviewed and discussed by the full project group.

Section 3 outlines the consultation process.

## 2. Key themes in the consultation

### Priority 1 Improve quality, safety and sustainability

*1.1 Improve the quality of council homes and estates*

*1.2 Prioritise building and fire safety improvements*

*1.3 Improve standards in the private rented sector*

*1.4 Improve sustainability and energy efficiency*

#### Support for proposed priority

Amongst those who responded to this question (319/347) there were high levels of support for the proposed priority (82.1% agree or strongly agree; 4.3% disagree or strongly disagree). There were similar levels of support for the four proposed areas for focused action.

#### Theme: Quality and standards in council housing

Several respondents expressed concern about the poor quality of all types of rented housing particularly in relation to damp, mould and sound insulation. There were calls for more stringent standards and enforcement of those standards across both social and private rented housing. Concerns about the safety of council homes were raised, with suggestions for improvements including better maintenance. The council was encouraged to go beyond the regulatory requirements.

#### Initial response

The council takes its responsibilities as a landlord seriously. We will prioritise work to improve the quality of our own housing stock, with a focus on building and fire safety improvements to ensure that we meet legal and regulatory requirements. Where resources permit, we will seek to go beyond these requirements.

The draft strategy acknowledges historic underinvestment in our properties. Some of our homes need refurbishment, others may need renewal in the longer term. The draft strategy commits us to a housing asset management programme which will ensure we better understand the condition of our homes and inform investment in planned and major works. We aim to shift from a reactive to proactive approach to repair, maintenance and renewal.

From 1 April 2024, all social landlords, including the council, are subject to a new and challenging regulatory regime with an expectation of full compliance with the outcomes and expectations set out in the Regulator of Social Housing's Consumer Standards. This new regulatory regime is intended to hold social landlords to account and ensure that all socially rented homes are decent, safe and well-maintained and that tenants receive quality landlord services and are treated with fairness and respect. The draft strategy sets out at a high level, how we will meet and maintain these standards. Detailed plans for each of the consumer standards sit

behind the priorities as outlined in the strategy. We will work with other social landlords to share information and best practice and to drive-up standards across the social rented sector in the city.

Our approach to standards in the private rented sector is set out in the next section.

### **Theme: Standards in the private rented sector**

How the council supports improvement in the private rented sector was a key issue for many respondents. Suggestions include introducing more HMO licenses and better regulation of landlords, including calls to challenge discrimination by private landlords against people on benefits and groups such as single parents, people with learning disabilities and people from Black and racially minoritised groups. There are calls for the council to do more to support private sector renters. Others want the council to be tougher on rogue landlords. Some respondents suggested the council should work proactively with landlords and landlord network organisations to improve standards. Some expressed concern about the impact of greater regulation on the private rented sector, including landlords selling up or raising rents to cover their extra costs.

### **Initial response**

The draft strategy sets out our approach to improving standards. We believe that this balances the need to protect tenants with the need to ensure that responsible landlords can continue to operate in the city. Within the legislative framework available to us, we will set local standards and enforce legal requirements. We have set a clear pathway for licensing in the city with the introduction of a new Additional Licensing Scheme for smaller HMO's and a Selective Licensing Scheme in 4 wards in the city. The council's intention is to apply to the Secretary of State for a wider selective licensing scheme in 2025.

With over a third of our residents renting privately we recognise the key role of private sector landlords in providing an important source of accommodation. We will work with landlords and their networks to ensure that they understand their responsibilities, are able to share and access good practice guidance and are kept up to date with relevant changes in national legislation and local requirements. In addition, where grant funding is available, we will ensure this information is shared with renters and landlords to help improve conditions in their homes.

We remain committed to identifying and tackling rogue landlords using all the powers at our disposal. Following the announcement of a Renters' Rights Bill in the King's Speech we prepare for the anticipated changes in legislation.

### **Theme: Energy efficiency and sustainability**

Improving insulation and energy efficiency in older housing stock was a recurring theme amongst responses. Some suggested tax breaks or grants for energy efficiency measures and the integration of renewable energy sources in new developments and refurbishment programmes. Some respondents suggest that the strategy should have a greater focus on sustainable development and environmental standards.

## **Initial response**

The council must work within the scope of its powers and resources and the nature of the housing stock that we have in the city, for example, its age and quality. Whilst we support measures to improve energy efficiency through the tax system, this change would need to be implemented at a national level. In some areas, we must balance competing priorities, for example, fire safety and sustainability. In these instances, we will prioritise our statutory duties.

The age of our own housing stock means that improving the energy performance of council homes is a priority for us. We have an ongoing programme to install solar PV panels, decarbonise communal heating systems, insulate and replace doors, windows and roofing to improve energy efficiency. This will reduce costs for our tenants and contribute to meeting net zero targets. As set out in the draft strategy, we are working to support owners of private property to access grants to improve the energy efficiency of their properties. In the coming year we will update our plan to tackle fuel poverty and increase access to affordable warmth.

The council is committed to the delivery of the Future Homes Standard to make new homes more energy efficient and low carbon by 2025. The refresh of the City Plan Part 1 beginning later this year, gives us the opportunity to review whether we should seek to go further than the national standard.

## **Priority 2 Deliver the homes our city needs**

***2.1 Increase the supply of high-quality homes that meet the needs of our communities***

***2.2 Increase the supply of affordable homes***

***2.3 Create places where people are proud to live***

## **Support for proposed priority**

Amongst those who responded to this question (307/347) there were high levels of support for the proposed priority (78.4% agree or strongly agree; 3.4% disagree or strongly disagree). There were similar levels of support for the three proposed areas for focused action.

## **Theme: Need for a range of housing options**

Several respondents wanted more specific housing types to be available in the city, including single-person accommodation, family homes, and specialist housing. There were also calls for more social rented homes and downsizer housing. Several respondents acknowledged how challenging delivering more housing at pace is for a city with high land prices and limited sites for large scale development. Suggestions to address this include building medium to high-density housing, building on the urban fringe, greater use of brownfield sites, self-build, modular and 'flatpack' housing. Others suggested repurposing existing buildings, including empty properties and office spaces to alleviate housing shortages rather than focusing on new construction. Some called for better use of council owned land and assets for

development. Several respondents stressed the importance of good quality design, including calls for a design code to set expected standards.

### **Initial response**

We recognise that the draft housing strategy did not clarify the distinct roles of a housing strategy and the City Plan. The housing strategy focuses on housing needs and solutions. It addresses major challenges like the quality and safety of our housing stock, affordability across tenures, homelessness, and the delivery of housing services. The City Plan has a broader scope and includes strategic policies to address priorities for the development and use of land in the city. It encompasses the entire city's development, including the development of housing (including affordable housing), transportation, infrastructure, economic opportunities, and environmental concerns. The housing strategy informs the City Plan and aims to ensure that housing priorities and needs are integrated into the city's overall development strategy.

Many of the issues raised in relation to Priority 2 are more appropriately addressed through the City Plan. The council has begun the process of reviewing the City Plan Part 1 which will set out the strategic planning framework for the city to 2041. This gives the council the opportunity to set a revised housing delivery target and address the mix of housing that the city needs going forward. It will be shaped by the Strategic Housing Market Assessment 2023, the Housing Strategy 2024 to 2029 and consultation with residents and other stakeholders on proposals brought forward by the council.

The City Plan Part 2 was agreed in 2022 and supports the delivery of several of the solutions to the city's diverse housing needs suggested by respondents. It encourages the provision of a wide range of housing delivery formats including community led housing, self and custom build and modular build. It also sets out the council's expectations for high quality design, making effective use of brownfield sites and includes policies requiring adaptable and accessible homes, space requirements, energy efficiency and access to outdoor amenity spaces. The citywide urban design framework Supplementary Planning Document (SPD) sets out citywide design guidance that must be considered in the determination of planning applications for new residential development. Design codes were introduced by Levelling-up and Regeneration Act 2023. Although we are awaiting secondary legislation / regulations, we are piloting this approach in the city centre and will roll out across the city in due course.

The council makes active use of its own land and building resources to support the delivery of affordable housing - whether that is regularly reviewing assets and landholdings to support a pipeline of sites or to repurpose a building such as at

Palace Place. We will continue to look for opportunities to make the best use of our Housing Revenue Account<sup>3</sup> assets.

### **Theme: Housing suitable for specific groups**

Some respondents highlighted the need for housing that meets the needs of specific groups such as LGBTQ+ people, disabled people, those with learning disabilities and autism and ex-service personnel. Some draw attention to changing needs linked to the aging population. The need for homes to be adaptable and accessible for people with disabilities was highlighted by several respondents. There were also calls for affordable housing suitable for key and essential workers. Supply of safe, good quality, affordable student housing was mentioned by several respondents.

### **Initial response**

The City Plan supports the provision of a range of housing options for older and disabled people and those with specialist needs. As referred to above, all new residential development must meet accessible and adaptable building control standards and at least 10% of affordable housing are required to be fully accessible for wheelchair users. Council services collaborate to develop housing suitable for people with disabilities including adapted housing suitable for disabled adults, children and young people. There are also policies in place to support the provision of high-quality purpose-built student accommodation which favour the more affordable cluster type development. The City Plan requires student housing developments to provide an appropriate security presence, space for living and studying and appropriate amounts of communal space.

### **Theme: Planning and development**

Some respondents suggest that local communities should have more say in the planning of development and that specific groups should be consulted on their housing needs. There is support for Community Land Trusts and third-sector non-profits as alternatives to the private sector in the provision of housing. Some responses indicate a desire to protect green spaces and avoid overdevelopment. Respondents proposed more car-free developments as well as arguing that current development practices favour market rate housing over affordable options.

### **Initial response**

Public consultation will be undertaken at each stage of the process in bringing forward the review of the City Plan. The first stage is to gather views from residents and all stakeholders on what are the key issues for the plan to address and housing provision is clearly one of the most important issues. Adopted planning policies already support and encourage a wide range of housing delivery options. Residents may also comment on any planning application for development that is made by registering their comments of the council planning portal. The council consults widely during the design stage of our own development projects, often using Planning for

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<sup>3</sup> The Housing Revenue Account (HRA) is intended to record expenditure and income on running a council's own housing stock and closely related services or facilities, which are provided primarily for the benefit of the council's own tenants.



Real to ensure that the views of the community inform the design. This goes beyond the requirements of the planning process.

### **Theme: Affordability**

Many respondents express concerns about the high cost of private renting and home ownership in the city. Some criticised the lack of a clear strategy on how the council will tackle affordability in the private rented sector. Some also suggested rent caps to address the gap between social and private rents. Several respondents called for 'truly affordable' housing that aligns with local incomes. The need to house key and essential workers was a concern for some respondents. The impact of buy to let, second homes, short-term lets and under occupation on housing availability and affordability were also raised.

### **Initial response**

Delivering affordable homes is one of our greatest challenges as evidenced by the large number of responses relating to this issue. While we have a requirement for the provision of affordable homes on new developments, we will also look at all other options for creating affordable homes to meet the needs of local people. As part of the review of the City Plan Part 1, the council will commission an affordable housing viability study which will help inform setting affordable housing requirements for new development.

We have several programmes and projects underway. These include New Homes for Neighbourhoods, an estate regeneration programme for building medium to large developments of council homes on council-owned land. We are also working to maximise social value from projects within the programme during the construction phase. Hidden Homes is a programme of smaller scale development which provides new council homes by converting empty or 'hidden' spaces in council properties and building on small pockets of land. Homes for Brighton and Hove is a joint venture between Brighton & Hove City Council and the Hyde Group. We have combined resources to provide 1,000 new affordable homes for local people.

We continue to buy back former council homes sold under the Right to Buy, to let to people in housing need. To date the 'buy back' programme has brought over 350 homes. We also have looked at opportunities to buy properties off plan with Kubic Apartments providing 38 homes and the purchase of 21 homes at the former St Aubyns School, Rottingdean.

Short term lets have the same use class as other housing and we are unable to treat them differently under current planning rules. We do have a policy in City Plan Part 2 that allows us to consider whether a loss has occurred through a change of use where evidence points to this. The previous government consulted on introducing a new use class and we are awaiting clarification of this government's intentions. This could allow us to look at short term lets differently.

We are actively working to reduce the number of private sector long-term empty homes in the city and bring these properties back into use. Our Empty Property

Working Group are developing a collaborative and strategic partnership to ensure we utilise all the powers at our disposal to tackle this issue. The council agreed to impose the premium rate of council tax for homes that have been empty for over a year in April 2024 with this also applying to second homes from the start of the 2025-26 financial year. The City Plan Review will explore this matter further with a view to introducing a principal residence policy such that new housing developed in the city should be marketed to local people only.

### **Theme: Community and physical infrastructure**

Some respondents called for greater consideration of the impact of development on existing services such as healthcare and education. They stress the need for services like doctors and dentists alongside new housing developments as well as community facilities, green spaces, roads, and transport connections. The need for development that fosters community spirit and provides local amenities is mentioned.

### **Initial response**

The council needs to balance the need for additional housing with the need to stimulate the local economy, protect and enhance the city's heritage and cultural offer and access to open spaces. These are all issues that will need to be addressed in the forthcoming review of the City Plan Part 1. The plan review will also need to look at the need for additional infrastructure to accommodate demand generated by new development. An infrastructure delivery plan will accompany the draft plan.

## **Priority 3 Prevent homelessness and meet housing need**

### ***3.1 Increase our effectiveness in preventing homelessness***

### ***3.2 Reduce the number of households in temporary accommodation***

### ***3.3 Focus our assistance on people who need most help***

### **Support for proposed priority**

Amongst those who responded to this question (311/347) there were high levels of support for the proposed priority (81.3% agree or strongly agree; 5.2% disagree or strongly disagree). There were similar levels of support for the three proposed areas for focused action.

### **Theme: Targeted prevention**

Some respondents emphasised the need for targeted support to prevent homelessness in vulnerable populations, including LGBTQ+, refugees and asylum seekers, care leavers, ex-service personnel, people with autism, and those with multiple compound needs.<sup>4</sup> There were calls for better support for single mothers, people living in vans, and other vulnerable groups who may not have adequate housing or access to support. A holistic approach to preventing homelessness is

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<sup>4</sup> Multiple compound needs refers to the needs of people who experience a number of needs, for example, drug and alcohol problems, mental health problems, disability or long-term health conditions.

advocated by some, addressing interconnected issues such as employment, health, social networks, and living standards

### **Initial response**

We recognise that people from some groups or those with protected characteristics are at higher risk of homelessness than others. Some respondents pointed out that the intersection of different characteristics can heighten risk. We are keen to work with members of the groups identified, their advocates and community organisations to further develop a targeted approach to homelessness prevention. We believe that the best way to do this is to ensure that we deliver a homelessness prevention service that is accessible, inclusive and equitable for all. We will use data and evidence from our services and our partners to identify those who are at greatest risk of becoming homeless or who are more vulnerable when they are homeless to target our services and our support. We will also work with our partners in the Multiple Compound Need programme to better integrate our service response.

### **Theme: The role of the Third Sector**

The importance of working collaboratively with local services, charities, and organisations was stressed by some to better support those at risk of homelessness or who are homeless. The importance of funding and resources for community organizations and charities was highlighted, with concerns about recent funding cuts affecting homelessness prevention and support in the Third Sector

### **Initial response**

The Third Sector deliver important and valued services to people at risk of homelessness as well as those who have become homeless. We want to reiterate our commitment to work in partnership with the sector. We currently commission a range of services from Third Sector organisations. In the context of diminishing resources and increasing need, we must sometimes take difficult decisions about the services we commission. In doing this, we will always seek to achieve the best possible outcomes for people in housing need within the resources we have available.

### **Theme: Support for people who are homeless**

Some respondents advocated for a Housing First approach as a tool to address homelessness. Respondents suggest that more preventative measures are needed to address the root causes of homelessness, including early intervention, support services, and tackling issues like addiction. Some respondents pointed out that the integration of support services such as healthcare, mental health services, and social care is crucial to addressing homelessness comprehensively.

### **Initial response**

Brighton & Hove's Housing First service is one of the largest programmes of its kind in the country. It offers wraparound support for people with a range of complex needs and a history of rough sleeping. It provides the security of a home first before exploring additional support tailored to individual needs. This might involve help to deal with substance abuse, support to get treatment for mental or physical health issues, or assistance with accessing training or employment. The service is funded by a central government grant, commissioned by the council and run by St Mungo's.

In advance of the public consultation, the council received detailed proposals for the development of a homeless health hub. We support the principle of greater integration and are working towards this in several service areas. Working with our partners, we will explore how we best integrate health, housing and other services to improve outcomes for people who are homeless through the Multiple Compound Needs programme.

### **Theme: Emergency and temporary accommodation**

Concerns were raised by some about the quality and safety of emergency and temporary accommodation, with suggestions for improvement, such as bringing provision in house, and greater accountability for external providers. The high local cost of housing and the challenges faced by those in low paid employment or on benefits are noted, with calls for more affordable housing options to ensure that people can move on from temporary and emergency accommodation.

### **Initial response**

We recognise that the draft strategy does not place enough emphasis on improving the quality of existing emergency and temporary accommodation. While we will continue to focus on reducing the numbers of people placed in emergency and temporary accommodation, we will also be clear that improving the quality of accommodation is also important. We do not believe that bringing the management of emergency and temporary accommodation in house is the best option. We think that the level of specialism needed is best met by an external provider. We are bringing forward proposals to reprocure our services in this area and will seek a partnership with a provider to deliver better value and flexibility as well as improved outcomes for clients.

### **Theme: Allocation of social housing**

There were calls for more transparency around the allocation of social housing and the bidding system. Some respondents suggested prioritising local people, others called for priority to be given to those in high need, including people fleeing domestic abuse or modern slavery, refugees and asylum seekers, people leaving care, people with multiple, complex needs.

### **Initial response**

We have developed detailed proposals for a new housing allocation policy. The consultation on these proposals ended on 8 June 2024 and a new policy will be brought forward for approval by the council's Cabinet in the autumn. Proposals included removing the queuing system and a revision of the criteria for prioritisation. The local residency criteria will be refreshed enabling people with a long-term connection to the city to continue to qualify for the housing register if they must move away for a period, for example, for life events such as caring for family members outside the city. The new policy will also ensure that we meet our legal duties in the allocation of social housing.

## **Priority 4 Support independence and improved health and wellbeing for all**

*4.1 Work with partners to develop safe, healthy and inclusive estates and neighbourhoods*

*4.2 Support people to live independently*

*4.3 Promote healthy housing for our residents*

### **Support for proposed priority**

Amongst those who responded to this question (313/347) there were high levels of support for the proposed priority (82.7% agree or strongly agree; 2.3% disagree or strongly disagree). There were similar levels of support for the three proposed areas for focused action.

### **Theme: Community spaces and safety**

Some respondents suggested focusing on creating safer streets, improving community spaces and giving more attention to the impact of crime and anti-social behaviour on neighbourhoods and residents. The importance of educating residents about their responsibilities and empowering communities through local decision-making was also emphasised by some.

### **Initial response**

Supporting communities to develop networks with friends and neighbours creates more community activities, reduces social isolation, improves wellbeing, and promotes resilience and independence. The council has previously worked with communities in East Brighton, Hangleton & Knoll and Moulsecoomb & Bevendean to produce Neighbourhood Action Plans. We are currently reviewing our approach to neighbourhoods and will bring forward proposals for empowering communities to shape local decisions in due course.

We take crime and anti-social behaviour seriously and have a legal duty to take crime and disorder into consideration in everything we do. We will continue to work with residents and our partners to tackle crime and anti-social behaviour in neighbourhoods and on our estates. We are keen to support the creation of Neighbourhood Watch Groups, Residents Associations, and Local Action Teams. Residents have several channels for reporting crime and anti-social behaviour. We will continue to publicise these and seek to strengthen our response where possible. Educating new council tenants on their rights and responsibilities is part of our initial engagement during their introductory tenancy.

### **Theme: Inclusivity and specific needs**

A significant number of respondents emphasised the need for housing that is inclusive and caters to the specific needs of different groups, including people with disabilities, refugees and migrants and those with mental health issues. There were calls for a range of housing options to cater to diverse needs, including shared community spaces to encourage social mixing as well as support for people with complex needs. Some respondents drew our attention to the difficulties experienced

by individuals and their neighbours when people with challenging or complex needs are housed within a mixed community.

### **Initial response**

We acknowledge that the draft strategy does not refer explicitly to the needs of some groups. There are existing plans and strategies relating to housing needs already in place for people with learning disabilities, people with autism and people with mental health issues. We recognise that we also need to revisit our approach to the provision of housing for older people. We will reflect these priorities more clearly in the final strategy and reflect actions from existing plans within our housing strategy action plan. It is our expectation that, just as the housing strategy is derived from the council plan, any subsequent council plans with a housing element, should align to the priorities in the final housing strategy. Where these plans are agreed in partnership with other organisations, we would expect that these also consider the priorities set out in the housing strategy.

### **Theme: Supported housing and independent living**

There were calls for support mechanisms for those who may not be able to live independently due to high-level support needs, as well as for young people with autism or learning disabilities. The need for provision for those requiring lifelong care was mentioned, highlighting the importance of thinking about care and support as well as independent living housing solutions. The shortage of social care staff and the need for better-resourced services were highlighted as critical issues that need addressing.

### **Initial response**

The Supported Housing Act (2023) requires the council to review certain types of supported accommodation and develop plans for supported housing going forward.<sup>5</sup> This is set out in the draft housing strategy. Respondents are correct about the challenges involved in delivering services to those who need support to live independently or who need long term care. We also acknowledge that the strategy does not adequately address the needs of those who are unable to live independently or whose housing and support needs we are not currently able to meet in the city. We recognise that we also need to review our approach to sheltered and retirement housing and will make this explicit in the strategy. We will work with social care colleagues, specialist housing providers and through our existing partnerships to develop and bring forward more detailed plans.

### **Theme: Healthy housing**

Damp and mould were recurring issues raised by respondents. Others flagged overcrowding, access to green spaces and active transport options. The impact of noise on people's mental health and wellbeing was also raised by some.

### **Initial response**

We are developing detailed plans for tackling damp and mould in our own properties and we will work with landlords to address this in their properties. We anticipate that

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<sup>5</sup> Some supported accommodation is known as 'exempt' because it is exempt from the usual caps on housing benefit levels, meaning residents can receive a higher amount of housing benefit than usual. This additional housing benefit usually assists with the costs of providing care and support.



Ahwaab's Law, which currently only applies to social landlords, will be extended to private sector rented properties. Where we have the powers we will enforce compliance with the requirement for landlords to investigate and address damp and mould in their properties.

While healthy housing, apart from damp and mould, was not a major concern for many of those who responded to the consultation, we believe that good housing is the cornerstone of good health and wellbeing. We also recognise the wide-ranging impacts that cold homes can have on health and wellbeing. We will provide further detail on how we will continue supporting residents with fuel poverty and affordable warmth later in the year. We have a wide range of services and initiatives in place or planned to promote health and wellbeing, including mental health support, physical activity, food growing and more.

There are planning notes supporting food growing and our physical activity strategy supports an active city including active environments. We also incorporate a range of additional healthy and inclusive design standards for council led schemes.<sup>6</sup> Housing is key to delivery of an active city as is easy access to other facilities and opportunities, including green spaces, sports and leisure facilities as well as facilitating active travel.

## **Priority 5 Provide resident focused housing services**

### ***5.1 Listen to and engage with our residents***

### ***5.2 Ensure our housing services are accessible, fair and inclusive***

### ***5.3 Deliver effective, high quality housing services***

### ***5.4 Work with our partners to agree and deliver shared priorities***

#### **Support for proposed priority**

Amongst those who responded to this question (311/347) there were high levels of support for the proposed priority (79.2% agree or strongly agree; 2.6% disagree or strongly disagree). There were similar levels of support for the four proposed areas for focused action.

#### **Theme: Community engagement and consultation**

Some respondents called for ongoing, meaningful consultation with communities, including diverse voices and proactive engagement and criticised more traditional approaches to consultation and engagement often used by the council.

#### **Initial response**

Thank you to respondents who reached out to say they would like to be remain part of the conversation on housing in the city. We acknowledge the need to take a considered and nuanced approach to engagement, using a variety of methods, recognising that one-size does not fit all. To engage as many diverse people as possible we need to use different types of engagement. The council has recently

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<sup>6</sup> Our Employer's Requirements and Design Guide for our own schemes incorporate the following standards: Building for a Healthy Life Design Code ; National Design Guide; Secured by Design; HAPPI; RIBA Challenge Targets ; Habinteg Wheelchair Housing Design Guide; Commission for Architecture and the Built Environment's Principles of Inclusive Design 2006.

developed a new community engagement framework setting out standards and principles for engagement and a toolkit for our staff. We will be working to ensure that this informs our practice across the council. We have also reviewed how we engage with our tenants and leaseholders and will implement recommendations in the coming months.

### **Theme: Fairness and equity**

Several responses highlighted the need for fair and equitable services, with some expressing scepticism about the fairness of the current housing system.

#### **Initial response**

We are faced with significant challenges in terms of lack of supply and increasing demand. The council will always prioritise meeting its legal and regulatory duties. We recognise however that, especially for the most vulnerable, our standard operating model does not necessarily result in the best outcomes. We will seek to learn from best practice elsewhere, as well as from our 'outstanding' rated children's services, including introducing a relational model for working with our most vulnerable clients. We will provide more assistance to help people move from larger social housing properties, for instance when children leave home. Through planned changes to our housing allocation policy, we will provide more opportunities for households to utilise other types of housing while remaining on the housing register.

### **Theme: Inclusivity and tackling discrimination**

The need for inclusivity in services and addressing discrimination, particularly against LGBTQ+ individuals, disabled people, single mothers, people on benefits, migrants and refugees and those from other diverse backgrounds, was stressed by some. The need for culturally sensitive services and proper training for staff was also mentioned. There was also some scepticism about how serious the council and its partners are in dealing with issues such as racially motivated harassment and anti-social behaviour.

#### **Initial response**

The council takes crime and anti-social behaviour, including hate crime, seriously. We will work with our partners and the relevant authorities to identify perpetrators and, where appropriate, take measures to prosecute them. We also acknowledge that some groups have difficulty accessing our services or are over- or under-represented in aspects of service provision, for example, in emergency and temporary accommodation. We are keen to work with people with lived experience and to use our service data and intelligence from our partners to identify who is using our services, make those services more inclusive and address inequity and discrimination. To help us do this we have agreed a council wide Anti-Racism Strategy and an Accessible City Strategy with detailed action plans, including for housing services. This includes staff training and recruitment and retention policies to ensure that our workforce better reflects the people that we serve. This autumn we will be consulting on a new Hate Incidents Policy for council tenants and leaseholders.

Although not an issue raised during the formal consultation, feedback received after the consultation had closed drew our attention to the omission of the specific needs of gypsies and travellers in the draft strategy. We will address this in the final draft.



**Theme: Accountability and transparency**

Many respondents asked for more accountability and transparency in the council's actions and approach, with a focus on practical solutions. Some suggest that a cultural shift within the council is necessary for the strategy to be successful.

**Initial response**

From 1 April 2024, the Regulator of Social Housing holds the council and other social landlords to account against four customer standards. These include a neighbourhood and community standard requiring social landlords to engage with partners so that tenants can live in safe-well maintained neighbourhoods; a standard about ensuring the safety and quality tenants' homes; a tenancy standard to ensure the fair allocation and letting of homes and how tenancies are managed and ended by social landlords; and, a transparency, influence and accountability standard including prescribed measures of tenant satisfaction. The council will be required to collect and publish information on its performance against a core set of measures. The Regulator will hold us to account for our performance.

**Theme: Access to services and quality**

Some respondents asked for physical offices and improved telephone services to assist those who struggle with online or have difficulty using technology. Some describe council processes as complicated and hard to navigate, especially for those who have difficulty communicating, for example, if English not a first language. There is a perceived lack of support to address access issues, for example with interpreting services. Several respondents called for improvements in the delivery of council repair services, including faster response times, improved contractor behaviour, and overall service quality.

**Initial response**

There are several ways that people can access our services. Where appropriate, for example, in paying rent, we provide online, self-service options so that our customers can make their transactions easily and conveniently. We also seek to make information about our services and other sources of support available online. However, we accept that this is not appropriate for everyone. Our telephone helpdesk handles a significant volume of calls (71,000 last year). We recognise that we also need to improve our call handling. Part of the solution will be to improve our online offer, so that people can find the information they need or make a transaction themselves. This means that we can focus on the issues that require a person-to-person service. Again, this will not be appropriate or accessible for everyone. While we acknowledge that some people prefer face-to-face interaction, our diminishing resources mean that we are only able to offer this on a limited basis. We will always seek to target support to where we have a duty to provide this and where there is greatest need.

**Theme: Communication and customer service:** Improving communication and customer service was highlighted by some as critical for the delivery of effective housing services. Training in trauma informed approaches for frontline staff was recommended by some respondents. Some observed that it is unclear what standard of service people can expect from the council and how they can complain if this standard is not met.

### **Initial response**

Based on this feedback we accept that we need to make improvements to improve people's experience of using our services. Our Customer Promise sets out the standards and principles of how we deliver services to our customers and provides a framework to monitor and measure our performance. We will also work to help people understand how our policies and processes operate, including improving the accessibility of the information we provide.

To help us develop an improved operating model we have begun to roll out a programme of trauma informed practice. Training and support have initially been offered to staff working with the most vulnerable clients but will be rolled out to other frontline staff as resources permit.

We publish information about how to complain and regularly publish performance information and how we are doing against our targets. We recognise that we need to improve the reach of this information and let people know what are doing to deliver better housing services. The Regulator of Social Housing now holds the council to account for its performance against a set of Consumer Standards and we are obliged to publish its findings and set out how we plan to improve.

### **Theme: Partnerships and collaboration**

The importance of working with a range of partners, including private developers, private and social landlords, anchor institutions such as the universities, NHS trusts etc, was stressed by some respondents. The council was challenged to be clearer about its priorities for partnership and partnership working. The potential role for people with lived experience and community organisations as partners was also highlighted.

### **Initial response**

We know that we will not be able to deliver the strategy without a range of partnership arrangements in place. These include partnership with our contractors and providers, joint working with other council and public services, a clearer understanding with the Third Sector, collaboration with other social landlords and closer relationships with the city's businesses and anchor institutions. We are currently reviewing our partnership arrangements for tackling homelessness and rough sleeping. We will identify how we best involve people with lived experience in this work, including at a strategic level.

We also recognise that Brighton & Hove is part of a broader region, and some partnerships cover a larger geography. Our relationship with neighbouring local authorities, housing associations and NHS organisations are examples of these. Some partnerships are in place already, others need to be built. We will revise this section of the strategy to be clearer about what we want to achieve through partnership working.

## *Other issues raised*

### **Theme: Implementation and follow-through**

Some respondents were sceptical about the implementation of the strategy and called for the inclusion of more specific actions and deliverables in the document. A few respondents were also sceptical about the potential for real change or improvement, suggesting that past initiatives have not led to tangible impact from their perspective. Some asked for more clarity about how the strategy will be implemented and how progress will be tracked. The importance of using data to understand residents' needs and inform the delivery of the strategy was also mentioned.

### **Initial response**

As set out at the beginning of the draft housing strategy, this is intended to be a short, high-level document setting out our priorities and where we will focus our activities over the next 5 years. Based on feedback from earlier engagement and feedback from the consultation, we will publish a more detailed action plan for Year 1 of the strategy (2024/25). This will include deliverables, key performance indicators and targets. This first year will reflect activity that is already resourced and where funding is in place. However, we will use the strategy to guide action and financial planning for subsequent years. We will publish information about our progress and refresh the action plan on an annual basis.

### **Theme: Financial considerations**

There were some concerns expressed by respondents about the financial impact of proposals on businesses and households and questioned the deliverability of the strategy given pressure on council budgets.

### **Initial response**

Where we bring forward specific proposals, for example, extension of licensing schemes or plans for housing development, we will seek to consult with those impacted and use those findings to inform our decisions. The actions we deliver will be shaped by the strategy but will need to be delivered in the context of our statutory duties and our financial and other resources. We will also seek to collaborate with other organisations to make the most of our resources to deliver improved outcomes for the city.

### 3. The consultation process

#### **Developing the draft strategy for consultation**

The vision of 'Homes for everyone' and the core priorities for the strategy are taken from the Council Plan 2023 to 2027. Following early engagement with the council's executive leadership team, directorate management teams, and relevant heads of service, five proposed priorities and areas for focused action for each, were developed and tested with members of the Housing & New Homes Committee and policy committee chairs. All councillors were invited to take part in a workshop to discuss these proposals. The Housing & New Homes Committee reviewed the draft strategy and agreed the consultation plan at its meeting on 13 March 2024.

The work to develop the draft strategy was overseen by a small officer project group initially led by the Executive Director for Housing, Neighbourhoods & Communities and from 18 March by the Interim Corporate Director Housing, Care & Wellbeing – Housing Lead. The project group was supported by a group advising on public consultation.

#### **Formal consultation**

The consultation on the draft strategy was launched on Your Voice, the council's consultation platform, on 18 March 2024. The project group reviewed progress fortnightly and considered potential changes to the consultation approach. This included reviewing responses received across the city's demographics and housing tenure types. Based on these reviews the project group adjusted the consultation plan and included targeted promotion and in person consultation events. It also extended the consultation period to allow more time for consultation with people with learning disabilities at the request of members of the Learning Disability Partnership.

#### **Promoting the consultation**

Allowing for duplication between the different mailing lists, over 500 groups and organisations were invited to take part in the consultation. In addition, they were asked to promote the consultation to their members, service users, staff and volunteers. All were sent a reminder at the beginning of May from the lead member for Housing & New Homes. Councillors were also asked to promote the consultation through their networks.

An invitation to take part was sent to:

- 120 individuals and organisations on a core stakeholder list
- 429 individuals, groups and organisations on mailing lists held by the council's Community, Equality and Third Sector teams

- 552 Third Sector groups and organisations on the Community Works mailing list
- 25 organisations in the Homelessness & Rough Sleepers Network

As the consultation progressed, invitations were also sent at the request of colleagues to:

- 69 organisations and individuals who took part in a local conference on housing for people with learning disabilities
- 61 groups and organisations in the Suicide Prevention Partnership
- 61 groups and organisations in the Dementia Action Alliance

### **Other publicity**

The council website included a news story on 18 March to promote the launch of the consultation and a further item on 29 April.

The Wave (council staff intranet)

Social media

Homing In magazine for council tenants and leaseholders

A range of e-newsletters produced by council services and our partners

200 posters were distributed for display in public buildings, including in housing offices and on residents' noticeboards.

Plasma screens in council buildings including libraries and family hubs

### **Face to face engagement**

Members of the project team attended meetings and events to promote the consultation and seek views from

Area Housing Panels

City Management Board

NHS Sussex Integrated Care System Executive Group

Just Life - Housing & Homelessness Focus Day

The council's Policy Network

The project team also organised an online consultation event attended by representatives from 36 groups and organisations on 8 May 2024 and a public event at Hove Town Hall attended by 16 individuals on 11 May 2024.

### **Accessibility**

The online survey was hosted on Your Voice, the council's consultation platform.

The platform is compatible with international accessibility standards for web content.<sup>7</sup>

It also has the option for people to complete a survey in any of the 10 most spoken languages in Brighton & Hove.

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<sup>7</sup> [WCAG 2.1 AA](#)

Large print, hard copy surveys were available on request by email or phone. An offer to provide the survey in other formats was made on the portal. As a result, an Easy Read guide and survey was requested during the consultation. This was produced for us by Speak Out, a local organisation with expertise in Easy Read. The guide was made available as hard copy and for download on Your Voice.

## Groups and organisations who submitted a consultation response

- ACORN Brighton
- Bristol Estate Leaseholders & Tenants Association
- Bridging Change
- Brighton Students Union
- Brighton & Hove City Council – Health, Care & Wellbeing, Commissioning & Partnerships
- Brighton & Hove Community Land Trust / Who Owns Brighton
- Brighton & Hove Energy Services Co-op
- Brighton & Hove LGBT Switchboard
- Clarion Housing Association
- Clock Tower Sanctuary
- Common Projects Limited
- Community Voices Group
- Grace Eyre Foundation
- Guinness Partnership
- Hyde Group
- iHowz
- Impact Initiatives
- Institute for Contemporary Theatre
- Justlife
- Making It Out
- Moda Living
- MySafeHome Limited
- NHS Sussex
- NHS Sussex Brighton & Hove Mental Health Accommodation Group
- Older People's Council
- RISE
- Rocket Artists CIC
- Safe Haven Sussex
- Single Parent Information Network
- SJOG Hospitaller Services - Support for victims of Modern Day Slavery & Trafficking under the NRM Scheme of UK Government
- Speak Out
- Speak Out East Drop In
- Speak Out Link Group
- Sussex Beacon

- Sussex Nightstop
- Turning Point
- University of Sussex
- Urban View
- Voices in Exile
- Zetetic Housing



## General Equality Impact Assessment (EIA) Form

### Support:

An [EIA toolkit](#), [workshop content](#), and guidance for completing an [Equality Impact Assessment \(EIA\) form](#) are available on the [EIA page](#) of the [EDI Internal Hub](#). Please read these before completing this form.

For enquiries and further support if the toolkit and guidance do not answer your questions, contact your Equality, Diversity, and Inclusion (EDI) Business Partner as follows:

- Economy, Environment and Culture (EEC) – [Chris Brown](#),
- Families, Children, and Learning (FCL) – [Jamarl Billy](#),
- Governance, People, and Resources (GPR) – [Eric Page](#).
- Health and Adult Social Care (HASC) – [Zofia Danin](#),
- Housing, Neighbourhoods, and Communities (HNC) – [Jamarl Billy](#)

### Processing Time:

- EIAs can take up to 10 business days to approve after a completed EIA of a good standard is submitted to the EDI Business Partner. This is not considering unknown and unplanned impacts of capacity, resource constraints, and work pressures on the EDI team at the time your EIA is submitted.
- If your request is urgent, we can explore support exceptionally on request.
- We encourage improved planning and thinking around EIAs to avoid urgent turnarounds as these make EIAs riskier, limiting, and blind spots may remain unaddressed for the 'activity' you are assessing.

### Process:

- Once fully completed, submit your EIA to your EDI Business Partner, copying in your Head of Service, Business Improvement Manager (if one exists in your directorate), Equalities inbox, and any other relevant service colleagues to enable EIA communication, tracking and saving.
- When your EIA is reviewed, discussed, and then approved, the EDI Business Partner will assign a reference to it and send the approved EIA form back to you with the EDI Manager or Head of Communities, Equality, and Third Sector (CETS) Service's approval as appropriate.
- Only approved EIAs are to be attached to Committee reports. Unapproved EIAs are invalid.

### 1. Assessment details

Throughout this form, 'activity' is used to refer to many different types of proposals being assessed.

Read the [EIA toolkit](#) for more information.

<b>Name of activity or proposal being assessed:</b>	<b>Housing Strategy 2024 to 2029</b>
<b>Directorate:</b>	Housing, Care & Wellbeing
<b>Service:</b>	Housing Needs and Supply
<b>Team:</b>	Strategy and Supply
<b>Is this a new or existing activity?</b>	New
<b>Are there related EIAs that could help inform this EIA? Yes or No (If</b>	Yes – see EIA archive <a href="#">Housing, Neighbourhoods &amp; Communities EIAs</a>

Yes, please use this to inform this assessment)	EIA Housing Strategy 2015 on council website <a href="#">here</a>
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## 2. Contributors to the assessment (Name and Job title)

<b>Responsible Lead Officer:</b>	Martin Reid, Interim Corporate Director, Housing, Care & Wellbeing, Housing lead
<b>Accountable Manager:</b>	Diane Hughes, Head of Strategy & Supply in Housing Needs & Supply
<b>Additional stakeholders collaborating or contributing to this assessment:</b>	Steve Morton, Policy Partnership & Scrutiny Officer Reena Johl, Policy Partnership & Scrutiny Officer Tom Matthews, Housing Performance Analyst David Golding, Public Health Data Specialist Jamarl Billy, Equality, Diversity, and Inclusion (EDI) Officer Sabah Holmes, Equality, Diversity, and Inclusion (EDI) Manager

## 3. About the activity

Briefly describe the purpose of the activity being assessed:

Although no longer a statutory requirement, the housing strategy is identified in the council's Constitution as part of the council Policy Framework. The strategy identifies the council's strategic priorities for improving housing outcomes in Brighton & Hove between 2024 and 2029.

What are the desired outcomes of the activity?

To deliver the council's vision of a better Brighton and Hove for all, including accessible, affordable, and high-quality homes for all residents. The 3 housing outcomes set out in the [Brighton & Hove City Council plan 2024 to 2027](#) are:

- Improved housing quality
- Increased housing supply
- Improved housing support

Following engagement and public consultation, the final version of the strategy identifies a further two outcomes. The five priority outcomes in Homes for everyone: Housing strategy 2024 to 2029 are as follows:

1. Improve housing quality, safety and sustainability
2. Deliver the homes our city needs
3. Prevent homelessness and meet housing need
4. Support independence and improved health and wellbeing for all
5. Provide resident focused housing services

Which key groups of people do you think are likely to be affected by the activity?

Everyone living in Brighton & Hove and people who would like to live in the city, across all protected characteristics and intersecting groups as set out in the council's [Equality Impact Assessment \(EIA\) Toolkit 2023](#). Specific disproportionate and intersectional impacts to be considered across all protected characteristics and vulnerable groups.

#### 4. Consultation and engagement

What consultations or engagement activities have already happened that you can use to inform this assessment?

- For example, relevant stakeholders, groups, people from within the council and externally consulted and engaged on this assessment. **If no consultation** has been done or it is not enough or in process – state this and describe your plans to address any gaps.

The council consults its tenants and leaseholders through regular engagement activities and surveys e.g. the [STAR survey](#). Their feedback is also collected through complaints and compliments data.

We have a statutory duty to consult tenants and leaseholders on changes that affect them and to take into account the results of those consultations. We have 4 Area Housing Panels which function as formal reference groups for the council's housing services. Their role and other forms of engagement is captured in the [Tenant and Leaseholder Engagement Strategy](#) which highlights the need for different engagement approaches to reach more diverse and a greater number of tenants and leaseholders.

The council also engages and consults on housing and related policy matters, for example,

- proposals for two private sector licensing schemes for the city
- a review of our housing allocations policy
- the City Plan Parts 1 and 2
- specific developments for example, proposals for the development of 77 new council homes as part of the New Homes for Neighbourhoods programme

The development of proposals in the draft housing strategy was informed by other consultation and engagement exercises that considered housing and related issues. This included work to inform:

- Adult Learning Disability Strategy
- Autism Strategy
- Health & Social Care Commissioning Strategy
- Mental Health Housing Action Plan
- Violence Against Women and Girls Strategy (in development)
- Tackling Anti-social Behaviour (in development)
- Community Safety Strategy
- Homelessness & Rough Sleeping Strategy
- Older People's Housing Needs Assessment
- Trans Needs Assessment

A formal consultation of 11 weeks took place from 18 March to 2 June 2024. The consultation was extended by two weeks at the request of members of the Learning Disability Partnership to give them more time to consult their membership and service users. Consultees were encouraged to use the council's online consultation portal but hard copy and Easy Read versions of the survey were also made available.

Consultation responses were reviewed fortnightly by the senior officer group overseeing the development of the strategy. This included actions to reach groups where the response rate was lower than expected, for example, older people. Two in person consultation events were held towards the end of the consultation period to accommodate those who had requested face to face engagement. Some Third Sector organisations organised consultation events for their service users.

A detailed consultation report is available on the council's consultation portal Your Voice. This sets out key themes in consultation feedback and the council's initial response. It also forms an appendix to the report to Cabinet 26 September 2024.



## 5. Current data and impact monitoring

Do you currently collect and analyse the following data to enable monitoring of the impact of this activity?  
Consider all possible intersections.

(Delete and indicate as applicable from the options Yes, No, Not Applicable)

<b>Age</b>	YES
<b>Disability and inclusive adjustments, coverage under equality act and not</b>	YES
<b>Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers)</b>	YES
<b>Religion, Belief, Spirituality, Faith, or Atheism</b>	YES
<b>Gender Identity and Sex (including non-binary and Intersex people)</b>	YES
<b>Gender Reassignment</b>	YES
<b>Sexual Orientation</b>	YES
<b>Marriage and Civil Partnership</b>	YES
<b>Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)</b>	NO
<b>Armed Forces Personnel, their families, and Veterans</b>	YES
<b>Expatriates, Migrants, Asylum Seekers, and Refugees</b>	YES
<b>Carers</b>	NO
<b>Looked after children, Care Leavers, Care and fostering experienced people</b>	YES
<b>Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)</b>	YES
<b>Socio-economic Disadvantage</b>	YES
<b>Homelessness and associated risk and vulnerability</b>	YES
<b>Human Rights</b>	NO
<b>Ex-offenders</b>	YES
<b>Lone Parents</b>	YES

**Additional relevant groups that may be widely disadvantaged and have intersecting experiences that create exclusion and systemic barriers may include:**

- Ex-offenders and people with unrelated convictions
- Lone parents
- People experiencing homelessness
- People facing literacy and numeracy barriers
- People on a low income and people living in the most deprived areas
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery

- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers

If you answered “NO” to any of the above, how will you gather this data to enable improved monitoring of impact for this activity? What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

The final strategy will be accompanied by an annual action plan. Specific projects and programmes will be assessed and monitored for their equality impacts.

While equalities data is collected, this is often incomplete or partial. It is also not done consistently or across all services. There are also gaps in data highlighted above. Much of our equality data collection is partial and our systems and processes do not facilitate the collection and analysis of data for all groups with protected characteristics. For example, data is held on temporary accommodation clients on both NEC Housing and Home Connections systems, information such as someone’s ethnic group may be on one system but not the other. There may also be practical reasons why data is not available or is not reliable. For example, data is not collected on pregnancy, maternity or paternity for housing register applications. It would be difficult to keep track of this data over time as most applicants remain on the register for several years.

**See Recommendation 1**

## 6. Impacts

### Advisory Note:

- **Impact:**
  - Assessing disproportionate impact means understanding potential negative impact (that may cause direct or indirect discrimination), and then assessing the relevance (that is: the potential effect of your activity on people with protected characteristics) and proportionality (that is: how strong the effect is).
  - These impacts should be identified in the EIA and then re-visited regularly as you review the EIA every 12 to 18 months as applicable to the duration of your activity.
- **SMART Actions mean:** Actions that are (SMART = Specific, Measurable, Achievable, Realistic, T = Time-bound)
- **Cumulative Assessment:** If there is impact on all groups equally, complete **only** the cumulative assessment section.
- **Data analysis and Insights:**
  - In each protected characteristic or group, in answer to the question 'If "YES", what are the positive and negative disproportionate impacts?', describe what you have learnt from your data analysis about disproportionate impacts, stating relevant insights and data sources.
  - Find and use contextual and wide ranges of data analysis (including community feedback) to describe what the disproportionate positive and negative impacts are on different, and intersecting populations impacted by your activity, especially considering for [Health inequalities](#), review guidance and inter-related impacts, and the impact of various identities.
  - For example: If you are doing road works or closures in a particular street or ward – look at a variety of data and do so from various protected characteristic lenses. Understand and analyse what that means for your project and its impact on different types of people, residents, family types and so on. State your understanding of impact in both effect of impact and strength of that effect on those impacted.
- **Data Sources:**
  - **Consider a wide range (including but not limited to):**
    - [Census](#) and [local intelligence data](#)
    - Service specific data
    - Community consultations
    - Insights from customer feedback including complaints and survey results
    - Lived experiences and qualitative data
    - [Joint Strategic Needs Assessment \(JSNA\) data](#)
    - [Health Inequalities data](#)
    - Good practice research
    - National data and reports relevant to the service
    - Workforce, leaver, and recruitment data, surveys, insights
    - Feedback from internal 'staff as residents' consultations
    - Insights, gaps, and data analyses on intersectionality, accessibility, sustainability requirements, and impacts.
    - Insights, gaps, and data analyses on 'who' the most intersectionally marginalised and excluded under-represented people and communities are in the context of this EIA.
- Learn more about the [Equality Act 2010](#) and about our [Public Sector Equality Duty](#).

## 5.1 Age

Does your analysis indicate a disproportionate impact relating to any particular Age group? For example: those under 16, young adults, with other intersections.	YES
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### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references

Data from the 2021 Census shows that compared to neighbouring areas, Brighton & Hove has a higher percentage of residents of working age but fewer people of school age and younger and those aged 55+. Census data also shows that the number of children and households with children has been falling. In 2021 there were 28,700 households with dependent children (23.7% of households) this compares to 29,800 on 2011 (24.6%). There are also wider issues with fertility rates falling. ONS data shows that across England and Wales the number of children per woman in 2012 was around 1.95 and fell to 1.6 in 2020 meaning that it will be almost inevitable that the number of school age children will also fall. Although national fertility rates have shown a recent increase to 1.7 children per woman in 2021. In Brighton and Hove the number of children per woman has always been notably lower than the national average. The city's fertility rate has fallen from 1.52 in 2008 to 1.07 in 2020.

The SHMA 2023 points out that the proportion of households with dependent children in Brighton & Hove is low with around 24% of all households containing dependent children in 2021 (compared with around 29% regionally and nationally). There are differences between different types of households with married couples with dependent children seeing a high level of owner-occupation, whereas as lone parents are more likely to live in social or private rented accommodation.

The SHMA 2023 points out that GP registrations point to an expected 26% fall in the number of school aged children between 2013 and 2026. This could in part be due to a lack of family housing and/or general affordability issues pricing families out of the city. Giving priority to the delivery of affordable housing as set out in the strategy could mitigate this to some extent. although market pressures are strongly driving the trend alongside the factors identified in the paragraph above.

Brighton & Hove's population profile based on Census data shows a significantly larger proportion of 18 to 24-year-olds compared to the regional and national averages. This may partly reflect large student numbers in the city. At the 2021 Census, there were around 33,600 people over the age of 16 that were students. Housing needs for dedicated term-term accommodation arise principally from full-time students (with those studying part time typically also living and working locally already or living with parents). The SHMA 2023 indicates that student numbers have been falling at the city's two universities since 2018/19. The SHMA projects some short-term growth in student numbers before falling again post 2031. The report also highlights issues with the cost of some Purpose-Built Student Accommodation and a reduction in the supply of private rented student accommodation in shared housing. This is also likely to impact costs of accommodation. The SHMA endorses the council's policy position to encourage the development of affordable purpose build student accommodation. This is reflected in the draft Housing Strategy 2024 to 2029.

The population of older people in the city is increasing, and the SHMA 2023 concludes that this could drive a need for more housing which can meet the needs of this age group. There is a clear link between age and disability and this intersection of characteristics means that this assessment should be read in conjunction with the section below on disability.

Census 2021 data Brighton & Hove has a younger age structure compared to the regional and national average with 14% of the population being aged 65 and over, compared with 19% regionally and 18% nationally. Brighton & Hove is projected to see a significant increase in the 65+ population, with a projected increase of around 46% between 2022 and 2041. The population under 65 is projected to



decrease by 2.5% during this period. In terms of numbers, the projections show an increase in the population aged 65+ of 18,400 people.

The 2021 Census also shows that most 65+ households are owner occupiers (72.3%) with 67% having no mortgage and who may therefore have significant equity. Some 18% of older persons households live in the social rented sector with the proportion living in the private rented sector relatively low at about 10%. Census also data shows that some 16% of individuals in the city have a long-term health problem or disability, with the proportion increasing to 53.7% in the 65+ population. Projections in the SHMA 2023 indicate that there will be large increases in the number of older people with dementia (increasing by 47% from 2022 to 2041 and mobility problems (up 46% over the same period).

The SHMA 2023 concludes that, given the ageing population and higher levels of disability and health problems amongst older people, there is likely to be an increased requirement for specialist housing options in the future. Recommendations for the type and quantity of specialist older people's housing is set out in the SHMA 2023.

The Older People Housing Needs Assessment 2019 commissioned by the council conducted focus groups and a survey of older people (55+) as part of broader research and analysis of housing needs in this group. They identified the following perspectives amongst those taking part:

- Older people are a diverse cohort with different views and aspirations about housing and support services they may need in later life
- There is interest in a mix of housing types to widen choice; this needs to be attractive and affordable for more older people.
- Some older people are interested in and willing to right size/downsize provided that an alternative home meets their needs and requirements, for example, it is located in a town centre, close to amenities, provides a safe and secure environment. (58.25% of respondents to the survey were planning to move at some point in the future. 38.4% were planning to move within the next 5 years and this increases to 56.6% within the next 10 years.
- This cohort are seeking opportunities to move to both specialist housing designated for older people and mainstream housing that is better designed to meet the needs of an ageing population.
- There is also evidence that other older people would like to be supported to remain living independently in their current homes by adapting their current home to make it more accessible and by improving connections to the local community.
- A variety of tenure options needs to be provided to reflect the different financial circumstances of older people seeking alternative housing.

The consultation on the draft Housing Strategy 2024 to 2029 included no responses from children (0-15) or adults 75+. Most responses were from young people and adults of working age (16-64). 13 responses were received from adults aged 65-74. A response was also received from the Older People's Council.

Issues raised in relation to age included:

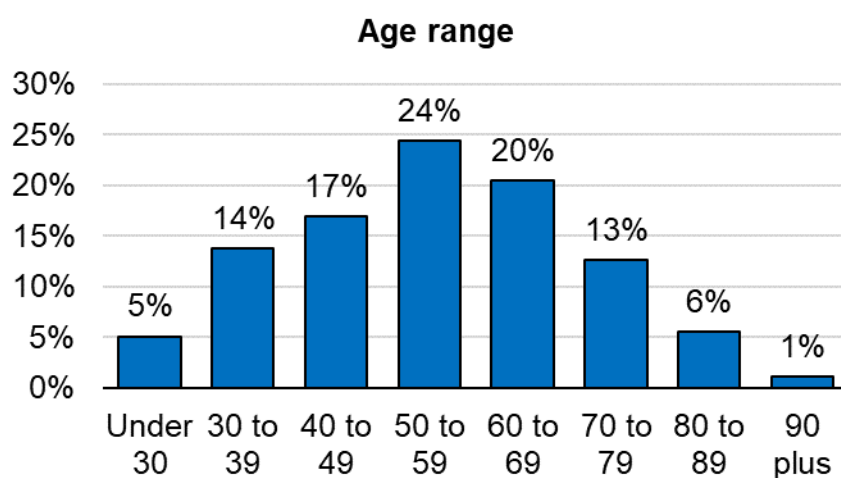
- Affordability and suitability of housing for young people
- Concern about the impact of damp and mould and air pollution on children and young people
- The need for housing suitable for young people with various disabilities and the need for independent living options
- Student housing, including the need for affordable, decent quality accommodation
- Community tensions in areas with a high proportion of young adults, especially living in HMOs
- Need for early prevention and outreach for young homeless and expand focus on temporary accommodation to include young people in transitional housing settings
- Emergency accommodation suitable for young people
- Information and advice that is appropriate for young people

- The need for mixed communities with options for older people to downsize in their local area and to reduce social isolation
- Housing that is suitable and affordable for older people with good quality 'built in' design and community facilities that are easily accessible.
- Impact on cost-of-living crisis and intersection between age and socio-economic disadvantage especially for young people and older adults.

The SHMA 2023 considers the intersections between age, sexual orientation, gender identity and gender reassignment in relation to the city's housing needs. This analysis should therefore be read in conjunction with sections 5.5, 5.6 and 5.7 below. The 2021 Census shows that, compared to the England average of 2.6%, Brighton and Hove have a much higher proportion of the population 65+ identifying as LGBT+ (5.9%). The city also has a higher proportion of trans people (1%) compared to the rest of England (0.5%). The SHMA cites national research which observes that older LGBT+ people are sceptical that those providing housing, care and support will be inclusive of them and that they will be treated with dignity and respect.

The age profile of council tenants in December 2023 is set out in the charts below:

Age range	No. of tenants	% of tenants
Under 30	670	5.1%
30 to 39	1,813	13.8%
40 to 49	2,223	16.9%
50 to 59	3,210	24.4%
60 to 69	2,698	20.5%
70 to 79	1,663	12.6%
80 to 89	732	5.6%
90 plus	145	1.1%
No data	10	0.1%
<b>Total</b>	<b>13,164</b>	<b>100%</b>



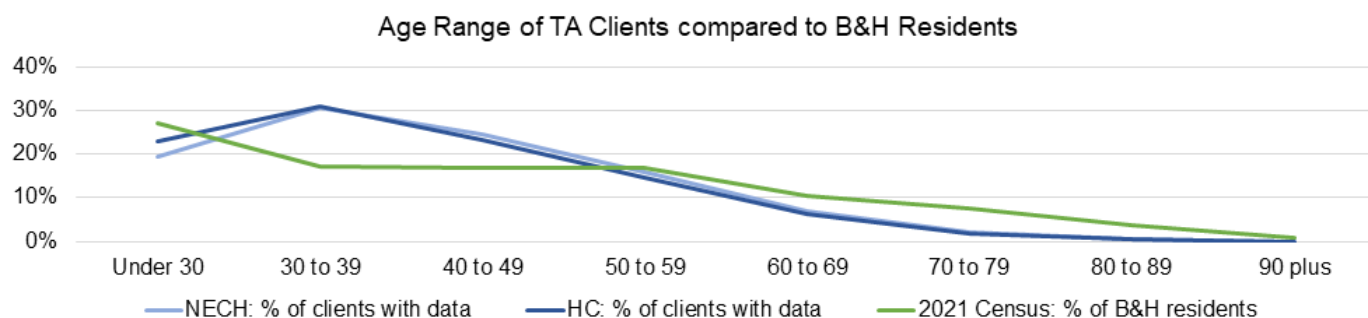
The age breakdown of those who made homeless applications to the council and were assessed during the 2022/23 financial year as either threatened with homelessness and owed a prevention duty (712) or already homeless and owed a relief duty (1,040) is set out in the table below. The majority were of working age, with 93.26% (1,634 of 1,752) under the age of 65 years. The median age was 40 years.

Age group of clients	No. of clients	% of clients
17-19	19	1.08%
20-24	150	8.56%
25-29	201	11.47%
30-34	267	15.24%
35-39	202	11.53%
40-44	245	13.98%
45-49	209	11.93%
50-54	151	8.62%
55-59	109	6.22%
60-64	81	4.62%
65-69	53	3.03%
70-74	33	1.88%
75+	32	1.83%
<b>Total</b>	<b>1,752</b>	<b>100.00%</b>

C, they are more likely to be in their 30s and 40s, about as likely to be in their 50s, and less likely to under 30 or 60 and over. Some possible factors behind this are higher rates of home ownership and lower rates of private renting with increased age, shorter life expectancy of homeless people, the increasing likelihood with length of stay (and therefore age) that clients in temporary accommodation will eventually move into social housing. The age breakdown and comparative data is shown below.

Age range	NECH: No. of clients	NECH: % of clients	HC: No. of clients	HC: % of clients	2021 Census: No. of B&H residents	2021 Census: % of B&H residents
Under 30	347	19.37%	422	22.77%	63,888	27.1%
30 to 39	548	30.60%	574	30.98%	39,966	17.0%
40 to 49	440	24.57%	430	23.21%	39,633	16.8%
50 to 59	285	15.91%	271	14.62%	39,276	16.7%
60 to 69	124	6.92%	114	6.15%	24,547	10.4%
70 to 79	36	2.01%	32	1.73%	17,385	7.4%
80 to 89	10	0.56%	10	0.54%	8,499	3.6%
90 plus	0	0.00%	0	0.00%	2,178	0.9%
No data	1	0.06%	0	0.00%	-	-
<b>Total</b>	<b>1,791</b>	<b>100.00 %</b>	<b>1,853</b>	<b>100.00 %</b>	<b>235,372</b>	<b>100.0%</b>

Please note all data in this table is available by single year of age, so can be presented in pretty much any different grouping. Also, the 2021 Census data (green headed columns) is for usual residents aged 16 and over.



Local and national data shows that people of working age are disproportionately in housing need. Children are most likely to be part of households where the adult(s) are aged 20–49. Plans to improve homelessness prevention and support for those who are homeless are therefore likely to have a positive impact on both these age groups.

**See recommendation 2**

## 5.2 Disability:

Does your analysis indicate a disproportionate impact relating to <a href="#">Disability</a> , considering our <a href="#">anticipatory duty</a> ?	YES
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### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The 2021 census indicates that 29% of households in the city have a member with a long-term health problem or disability. The council commissioned Strategic Housing Market Assessment (SHMA) 2023 indicates that the number of residents with disabilities is likely to increase substantially between 2022 and 2041 due to a forecast 46% increase in the population aged 65+ (whereas under 65s will remain static or decrease). There are also projected increases in the number of people with dementia and mobility issues which are likely to be concentrated in older age groups. The SHMA also indicates a future increase in demand for housing suitable for people with autism.

Demographic projections in the SHMA show:

- Significant increases in all areas of need and increasing complexity of need in the younger disabled adult population.
- People aged 18-64 predicted to have impaired mobility is estimated to increase by 9% from 2019 – 2030 in Brighton & Hove. This is significantly higher than the average in other areas where it is estimated to increase by 2%.
- It is predicted that there will be 11% more people between 18 and 64 with a moderate disability and a 15% increase in people with a serious disability by 2030. This equates to 580 more people out of a total of 1,047 more people with moderate to serious disabilities with personal care needs.
- 22% of adults in Brighton & Hove have two or more long term health conditions and this is expected to grow by 20% or 10,500 more people by 2030.
- There are more people aged 18 to 64 in residential and nursing care in comparison with most other local authorities, with around half of these placed out of area.

Analysis of housing service in December 2023 indicated that 6,411 or 48.7% of council tenants have a long-term health problem or disability. A more detailed breakdown is below:

Specific long term health problem or disability	No. of tenants	% of tenants
Other Health	3,660	27.8%
Mental Health	3,208	24.4%
Mobility	2,199	16.7%
Literacy	692	5.3%
Hearing	604	4.6%
Learning	493	3.8%
Sight	339	2.6%
Speech	142	1.1%
At least one of the above	6,411	48.7%
None of the above	6,753	51.3%
Total council tenants	13,164	100%

Additional vulnerabilities	No. of tenants	% of tenants
Alcohol	282	2.1%
Substance	238	1.8%
Gambling	17	0.1%

Detailed information on mobility	No. of tenants	% of tenants
Mobility 1 – Full-time wheelchair user	95	0.7%
Mobility 2 – Part-time wheelchair user	169	1.3%
Mobility 3 – Can only manage 1-3 steps	694	5.3%
Mobility issues other than the above	1,241	9.4%
Total mobility	2,199	16.7%

Disabled households are more likely to be in housing need than non-disabled households. For example, the 2021 Census showed that 44.1% of people identified as homeless were disabled. A breakdown of those who made homelessness applications to the council in 2022/23 indicated the following additional support needs:

- Physical ill health and disability: 24.94% (437 of 1,752)
- History of mental health problems: 35.33% (619 of 1,752)
- Learning disability: 4.62% (81 of 1,752)

Please note these are overlapping categories, so the percentages cannot be added together. However, 541 clients are recorded as having no support needs, so 69.12% (1,211 of 1,752) have at least one support need, so are potentially vulnerable in some way.

Analysis of people in temporary accommodation suggests that there is significant under-recording of disability on NEC Housing when compared to the Home Connection system, given that 8% are recorded as having a long-term health problem on NEC Housing and 28% are recorded as such on Home Connection. The profile of people placed into temporary accommodation as presented at the weekly EA/TA Reduction meetings also points to this under-recording. Nonetheless, the data from Home Connection still indicates that people in temporary accommodation, when compared to all residents of Brighton & Hove, are more likely to have a long-term health problem or disability (28% compared to 19%).

Long term health problem or disability	NECH: No. of clients	NECH: % of clients	HC: No. of clients	HC: % of clients	2021 Census: No. of B&H residents	2021 Census: % of B&H residents
Yes	143	7.98%	528	28.49%	51,797	18.7%
No or unknown	1,648	92.02%	1,325	71.51%	225,306	81.3%
Total	1,791	100.00%	1,853	100.00%	277,103	100.0%

Please note the 2021 Census data (green headed columns) is for usual residents of all ages. Also, the data from NECH and HC is only 'Yes' where the TA client had a disability recorded on either system, so the absence of this is not necessarily confirmation of no disabilities, hence the 'unknown' part of the wording here (by contrast, the Census question did have an option which would indicate someone does not have a disability).

53 people who responded to the 2024 housing strategy consultation indicated that they had a long-term health problem or disability. Of these 27 had a mental health condition, 23 had a physical disability, 13 were autistic, 10 had a sensory impairment and 9 had a learning disability. Issues raised included the need for supported housing, accessible housing, lack of suitable placements in the city, hate crime, accessible design, support to live at home, affordability, improved standards across tenures, independent living (including move on for young people from family to independent or supported housing), vulnerability and risk of exploitation.

An Equalities Impact Assessment and Needs Assessment carried out by the council's Health and Social Care Commissioning Team shows that there is a particular need for housing and support for:

- Young people aged 18-25 leaving the family home, residential colleges or other care settings with conditions such as Cerebral Palsy, other disabilities or brain injuries.
- People with brain Injuries that have some behavioural / complex needs which could put themselves or others at risk.
- People with conditions such as Multiple Sclerosis, Motor Neurone Disease, Huntington's, who have experienced a stroke, a spinal injury or have an Acquired Brain Injury (ABI) who continue to live at home and need a suitable property

Engagement with people with physical disabilities and their carers as part of the development of the Health and Social Care Commissioning Strategy in 2020 identified that people would like to be able to stay in their own home with adaptations if necessary for as long as possible and in some cases to the end of their lives

The SHMA 2023 found that whilst there are some socially rented wheelchair accessible flats across the city, most do not have support available on site or are clustered together geographically to enable support to be shared. There are also other needs, for example, there is a need for bariatric accommodation that can house and support people who weigh up to 55 stone. Council commissioners have identified a need for people with complex needs resulting from substance misuse, for example those with an acquired brain injury due to alcohol use.

Feedback from disabled people included in the 2015 housing strategy EIA included: lack of suitable housing supply (particularly family housing). Isolation on urban fringe for those reliant on public transport. Properties that are new built and considered as accessible often need radical adaptations including removing the adaptations put in prior to the client being identified. Social housing offers sometimes must be declined as the properties are either unsuitable due to access issues or location. Flats can be an issue when lifts break down.

The Brighton & Hove Learning Disability Strategy estimates that 5,031 adults in the city have a learning disability, of whom 1,259 have a moderate or severe learning disability. The strategy projects a total of 6,414 adults with a learning disability by 2035, most of whom (5,254) will be of working age.

Engagement conducted as part of the strategy development highlighted the need for a growth in all services. Attendees highlighted the increasing need for more individualised accommodation to address compatibility issues and those with challenging behaviours. There is also limited accommodation to meet the needs of those with physical needs alongside their learning disability. Due to the lack of vacancies in the city, some individuals are placed out of area away from family and friends.

The SHMA 2023 projects an increase of 2.9% in people 18-64 with autistic spectrum disorders (from 1,429 individuals in 2022 to 1,470 in 2041). Council data shows a rise in the demand for supported accommodation for autistic people.

Consultation with autistic adults to inform the Autism Strategy 2024 identified the following areas of need:

- appropriate and accessible information about housing options and housing support
- inclusive adjustments to enable autistic people to access housing support

- the provision of safe, stable and accessible housing that meets sensory needs across all types of tenure
- if homeless, that support is offered by staff that understand the needs of autistic people
- Emergency and temporary accommodation is not suitable for many autistic people
- Autistic people are at greater risk of conflict with neighbours

The Autism Strategy identifies a significant need for supported living accommodation for autistic people, many of whom also have access needs, a need for accommodation that takes account of sensory needs and physical health conditions. It also identifies a need for suitable provision for autistic adults with significant mental health conditions.

National Housing Benefit policy is based on adults under 35 sharing with others, and this is often not accessible for autistic people who need their own space. There is also a lack of appropriate supported living options for young autistic adults to develop their independence. These factors mean that autistic people are likely to remain living with their family or guardians for longer. Relationships can often break down and the autistic person can need to move out of the local area and away from their support networks or become homeless.

The housing strategy consultation in 2024 received 13 responses from individuals who identified as autistic. Issues raised included:

- Ensuring reasonable adjustments are made for autistic people
- Design standards to ensure suitability of housing for autistic people
- Targeted homelessness prevention and housing support for autistic people
- Training about autism for staff and contractors

The SHMA 2023 gives figures for adults with mental health issues in the city in 2022. This includes people with common mental health disorders (36,613), borderline personality disorder (4,648), antisocial personality disorder (6,428), and psychotic disorder (1,352). 13,913 adults have more than one psychiatric disorder. All these figures are projected to increase by 2041, with the largest projected increase (2.1%) in people with antisocial personality disorder.

The Sussex Partnership Foundation Trust Mental Health Discharge Improvement Plan for Sussex identified that between February and July 2021 there were 20 patients whose discharge was delayed. The main reasons for the delayed transfer of care in Brighton & Hove was a lack of available space in a residential home (5 persons) or supported accommodation (5 Persons).

The majority of those waiting for supported accommodation are homeless, i.e. the accommodation is not being provided in place of less suitable existing accommodation but to meet both support and housing need. The Government's information service on homelessness (H-CLIC) suggests that around 15% of all homelessness presentations to Brighton and Hove City Council had a support need due to a history of mental health problems.

In March 2022 the embedded Homeless Prevention Officer had a case load of 20 in-patients, all of whom were suitable for supported or general needs accommodation, and all of whom were homeless. Adult Social Care data shows that as of October 2021 there were 175 people placed in Mental Health Care homes by the council. 54% were placed out of area. For most (70%) this was due to a lack of appropriate placement rather than through choice.

Council data also shows that 16 people (9%) of those placed in Residential Care Homes would have been better placed in a supported living service if a service had been available. It also shows that around 17% of individuals placed in Mental Health residential care homes required nursing care, many of whom had needs around alcohol or substance misuse. On average people wait 3 months for a placement but this can be longer for people with specific needs such as substance misuse and mental health. Waiting lists for supported accommodation for those with mental health needs are very long and show that the current capacity is not sufficient to meet demand, especially for self-contained accommodation.



In October 2021 there were 15 people waiting for supported accommodation with 11 of those waiting for self-contained accommodation. The SHMA 2023 concludes that there is a lack of provision of supported living and residential care accommodation. Feedback from professionals as part of the engagement for the Brighton & Hove Mental Health & Housing Plan May 2022 found that 70% of respondents believed their clients would not be able to access accommodation suitable for their mental health needs.

Collection of data on disability within housing services is not consistent and there is evidence of under-reporting. This requires improvement. **See recommendations 1. and 2**

What [inclusive adjustments](#) are you making for diverse disabled people impacted? For example: D/deaf, deafened, hard of hearing, blind, neurodivergent people, those with non-visible disabilities, and with access requirements that may not identify as disabled or meet the legal definition of disability, and have various intersections (Black and disabled, LGBTQIA+ and disabled).

It is anticipated that measures set out in the Housing Strategy 2024 to 2029 are likely to have a positive impact on disabled people.

Early engagement identified a need for a strategic priority which explicitly addressed the role of housing in promoting resilience, independence and improved health and wellbeing for all, including people with disabilities. This was included as priority 4 in the draft housing strategy for consultation. This priority was supported by 82.7% of those who responded to this question (313/347). There were similar levels of support for the proposed areas for focused action

Relevant actions identified in the Housing Strategy 2024 to 2029 include:

- Tackling hate crime, including crime against people with disabilities
- Increasing support to vulnerable clients
- Support people to live independently through investment in adaptations to existing homes.
- Review the provision of exempt supported accommodation in the city and develop a Supported Housing Strategy to ensure we meet the needs of vulnerable households who need our services.
- Commission supported housing which addresses the needs of people with complex needs.
- Deliver new supported housing for people with physical disabilities.
- Prioritise support for the most vulnerable households to help them manage their tenancy, prevent debt and remain in their homes.
- Continue to improve our work across housing, adults' and children's services to design and commission services jointly.
- Take forward jointly agreed actions in our learning disability, autism and mental health housing action plans.
- Provide accessible information and advice to people who want to find accommodation which is best suited to their needs.

Furthermore, the accompanying Year 1 action plan includes actions in (2024/25) to:

- Support people with additional support needs to be independent and resilient (HS22) with specific deliverables relating to people with physical disabilities, people with learning disabilities, people with autism and people with mental health needs.
- Develop a Supported Housing Strategy to ensure we meet the needs of vulnerable households who need support (HS23)
- Enable people to live independently in their homes by providing housing adaptations (HS25)

- Provide housing information and advice appropriate to the needs of our diverse communities (HS31)
- Ensure that our housing workforce has the relevant skills and competencies to deliver an effective service to all residents (HS32). This action has specific deliverables around understanding the support needs of people with learning disabilities and people with autism.

Other actions that are likely to have a positive impact are:

- Align the commissioning of housing, children's, social care and health services to improve outcomes for residents (HS24) to address issues such as the transition between children's and adults' services
- Work with NHS and other partners to improve services and support for people with multiple, compound needs (HS34)

### 5.3 Ethnicity, 'Race', ethnic heritage (including Gypsy, Roma, Travellers):

<b>Does your analysis indicate a disproportionate impact relating to ethnicity?</b>	<b>YES</b>
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#### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the Census 2021 indicates that 4.8% of the population of the city identify as Asian or Asian British, 2% as Black or Black British, 4.8% as Mixed ethnic group and 3.1% as Other ethnic group. 85.4% of the population identify as White. This is higher than the national average of 81% White.

The table below breaks down data from the 2021 Census of household reference persons (the person who completed the form) by their ethnic group and housing tenure. Black and racially minoritised residents across the city were significantly more likely to be in the 'Private rented or lives rent free' category (51.3%) when compared with total citywide residents of all ethnic groups (32.9%).

2021 Census: Tenure by ethnic group - Household Reference Persons	Owned: Owns outright	Owned: Owns with a mortgage or loan or shared ownership	Private rented or lives rent free	Rented: Social rented	Total
Asian, Asian British or Asian Welsh	17.1% 827	25.1% 1,211	44.9% 2,166	12.9% 623	100% 4,827
Black, Black British, Black Welsh, Caribbean or African	7.1% 155	14.5% 319	48.2% 1,058	30.2% 662	100% 2,194
Mixed or Multiple ethnic groups	12.5% 460	24.6% 907	47.7% 1,762	15.2% 563	100% 3,692
Other ethnic group	11.8% 402	19.5% 666	48.6% 1,661	20.1% 687	100% 3,416
White: English, Welsh, Scottish, Northern Irish or British	28.5% 26,466	28.7% 26,599	27.2% 25,272	15.6% 14,456	100% 92,793
	12.9%	20.9%	59.6%	6.6%	100%

White: Gypsy or Irish Traveller, Roma or Other White	1,594	2,578	7,340	811	12,323
White: Irish	25.0% 539	32.0% 689	31.5% 679	11.5% 249	100% 2,156
Total	25.1% 30,443	27.2% 32,969	32.9% 39,938	14.9% 18,051	100% 121,401
Black and Racially Minoritised	13.9% 3,977	22.3% 6,370	51.3% 14,666	12.6% 3,595	100% 28,608

We have not been able to identify any local assessment of housing needs in relation to ethnicity, 'race' or ethnic heritage.

Housing service data from December 2023 indicates that council tenants were 81.4% White, 3.5% Black or Black British 3.2% Asian or Asian British, 1.8% Mixed and 2.1% another ethnic group, 8% prefer not to say / no data.

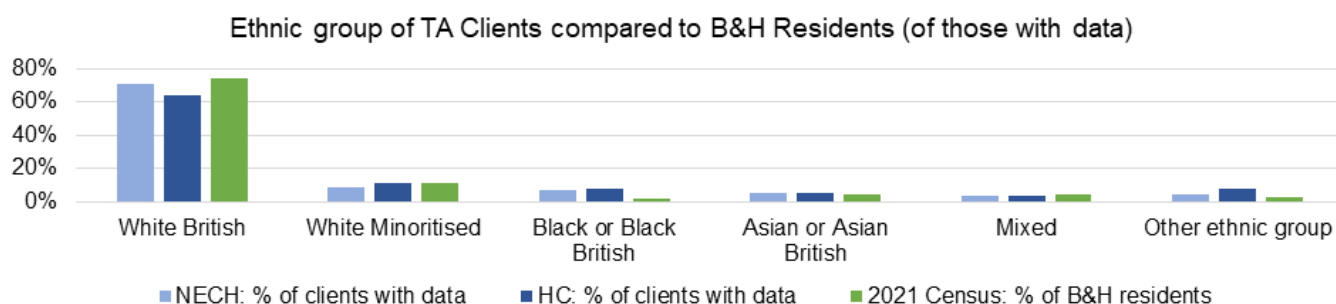
1,752 people made homeless applications and were assessed during the 2022/23 financial year. Of these, 27.79% (487 of 1,752) were Black and Racially Minoritised (non-White UK/British), 48.69% (853 of 1,752) were White UK/British and 23.52% (412 of 1752) do not have their ethnic group recorded. Of just those with their ethnic group recorded, 36.34% (487 of 1,340) are Black and Racially Minoritised and 63.66% (853 of 1,340) are White UK/British. This indicates that people who are Black and Racially Minoritised are more likely to become homeless than those who are White UK/British.

The table and chart below indicate that people in temporary accommodation, when compared to all residents of Brighton & Hove, are more likely to be Black or Black British or categorised as part of another ethnic group.

Ethnic group	NECH: No. of clients	NECH: % of clients	NECH: % of clients with data	HC: No. of clients	HC: % of clients	HC: % of clients with data	2021 Census: No. of B&H residents	2021 Census: % of B&H residents
White British	827	46.18%	70.93%	899	48.52%	64.17%	204,831	73.9%
White Minoritised	104	5.81%	8.92%	153	8.26%	10.92%	31,740	11.5%
Black or Black British	82	4.58%	7.03%	109	5.88%	7.78%	5,458	2.0%
Asian or Asian British	62	3.46%	5.32%	78	4.21%	5.57%	13,217	4.8%
Mixed	41	2.29%	3.52%	47	2.54%	3.35%	13,228	4.8%
Other ethnic group	50	2.79%	4.29%	115	6.21%	8.21%	8,629	3.1%
Prefer not to say	281	15.69%	-	368	19.86%	-	-	-
No data	344	19.21%		84	4.53%	-		
Total	1,791	100.00%	100.00%	1,853	100.00%	100.00%	277,103	100.0%
... of which Black and	339	18.93%	29.08%	502	27.10%	35.83%	72,272	26.20%

Racially Minoritised (BRM)								
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Please note the data in the table above is available for more specific ethnic groups, broadly in line with the categories used for the 2021 Census. Also, the 2021 Census data (green headed columns) is for usual residents of all ages.



Analysis of council data for people in temporary accommodation conducted in December 2023 looked at the reasons why people had become homeless. The analysis indicated that Black and racially minoritised (BRM) clients were more likely than non-BRM to be 'Domestic Abuse – Victim' (10.6% compared to 7.5%). They were more likely (11.8% compared to 7.3%) to be 'Friends no longer willing or able to accommodate'. More likely (6.6% compared to 0.1%) to be 'Required to leave accommodation provided by Home Office as asylum support'. They were slightly more likely (16.9% compared to 14.4%) to be 'End of private rented tenancy – assured shorthold tenancy'. Much less likely (9.4% compared to 19.5%) to be 'Family no longer willing or able to accommodate'.

The consultation on the draft Housing Strategy 2024 to 2029 received no responses from people who identify as Black or Black British, 3 responses were received from people who were Asian or Asian British and 5 responses from people reporting Mixed ethnicity. Responses were received on behalf of Brighton & Hove Community Voices and Bridging Change, groups working to challenge systemic barriers to Black, Asian and minoritised ethnic groups. Voices in Exile representing refugees and asylum seekers and SJOH Hospital Services who work with victims of trafficking and modern-day slavery also responded. Issues identified by respondents included:

- Being placed in accommodation in an area hostile to Black and racialised minorities
- Communication issues when English is not first language
- Perceived lack of support from the council and other statutory services when dealing with racism and other forms of hate crime
- Perceived discrimination by private sector landlords
- The needs of van and caravan dwellers

Following close of the public consultation on the draft housing strategy, a representation was received to consider the housing needs of gypsies, Roma and travellers with attention drawn to the 2022 briefing produced by Friends, Families & Travellers, *Accommodation issues facing Gypsies and Travellers in England*. This highlights a national problem with many local authorities failing to meet the needs of this group. The briefing recommends that local (and national) government should switch from an enforcement approach to encampments to an approach of provision, including permanent and transit sites and the promotion and adoption of negotiated stopping agreements. It also calls for the Government to reintroduce pitch targets and a statutory duty onto local authorities to meet the assessed need for Gypsy and Traveller sites, adopt a definition of a Traveller in planning terms that incorporates all Gypsies and Travellers who need a pitch to live on, and introduce a rolling programme of ring-fenced funding for local authorities to build Gypsy and Traveller sites.

Ethnicity, 'race' and ethnic heritage as a protected characteristic has many possible intersections including but not limited to religion, expatriates, migrants, asylum seekers, and refugees. This section should therefore be read in conjunction with sections 5.4 and 5.11 with other intersections also considered.

**See recommendations 2, 3, 4 and 5**

#### 5.4 Religion, Belief, Spirituality, Faith, or Atheism:

<b>Does your analysis indicate a disproportionate impact relating to Religion, Belief, Spirituality, Faith, or Atheism?</b>	YES
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#### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the 2021 Census. The figure in brackets is the England average.

No religion 55.2% (36.7%), Christian 30.9% (46.3%), Muslim 3.1% (6.7%), Buddhist 0.9% (0.5%), Jewish 0.9% (0.5%), Hindu 0.8% (1.8%), Sikh 0.1% (0.9%), Other religion 1.0% (0.6%), Not answered 7.1% (6.0%)

Some religious practices may require specific housing arrangements, such as communal living or adherence to specific architectural styles. Different cultural traditions within faith groups may also have certain housing preferences or needs. The age, family size, and socioeconomic status of members within a faith group can influence their housing requirements. Faith-based organisations make a significant contribution to addressing housing need, providing practical, spiritual and moral support to those in need.

Profiling of council tenants by faith conducted in December 2023 is as follows:

Religion or belief	No. of tenants	% of tenants	% of tenants with data
Christian	3,514	26.7%	45.8%
No religion	3,087	23.5%	40.3%
Muslim	493	3.8%	6.4%
Buddhist	75	0.6%	1.0%
Jewish	33	0.3%	0.4%
Hindu	22	0.2%	0.3%
Sikh	6	0.05%	0.1%
Another religion or belief	439	3.3%	5.7%
Prefer not to say	1,226	9.3%	-
No data	4,269	32.4%	-
Total	13,164	100%	100.00%

Information about faith is not recorded on homelessness applications, nor is it available for people living in temporary accommodation.

There are many intersections between faith and other protected characteristics, including but not limited to, ethnicity, 'race' and ethnic heritage and human rights. This section should therefore be read in conjunction with others.

## 5.5 Gender Identity and Sex:

<b>Does your analysis indicate a disproportionate impact relating to <a href="#">Gender Identity</a> and <a href="#">Sex</a> (including non-binary and intersex people)?</b>	YES
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### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The profile of Brighton & Hove mirrors that of England for Sex in the 2021 Census. The figure in brackets is for England. Female 51.1% (51.0%) Male 48.9% (49.0%)

Gender identity refers to a person's sense of their own gender, whether male, female or another category such as non-binary. This may or may not be the same as their sex registered at birth. The question on gender identity was new for Census 2021. The question was voluntary and was only asked of people aged 16 years and over. People were asked "Is the gender you identify with the same as your sex registered at birth?", and they had the option of selecting either "Yes", or selecting "No" and writing in their gender identity.

In Brighton & Hove 92.79% of those asked this question answered that their gender identity was the same as their sex registered at birth. The England average was 93.47%. In Brighton & Hove, 0.2% of those asked this question said that their gender identity was different from that registered at birth. Of these 476 gave no specific identity, 329 gave trans woman, 362 gave trans man, 835 gave non-binary, 339 gave another gender identity.

Equalities profiling of council tenants in 2023 gave the following breakdown:

Gender	No. of tenants	% of tenants
Female	7,925	60.2%
Male	5,230	39.7%
Non-Binary	2	0.02%
Other	4	0.03%
None	3	0.02%
Total	13,164	100%

Figures include 41 transgender tenants (of whom 22 female, 18 male and 1 other for gender).

The table below breaks down the sex (the term used in the data analysis) of council homelessness applicants of 1,752 clients in 2022/23.

Sex of clients	No. of clients	% of clients
Female	810	46.23%
Male	806	46.00%
Other	9	0.51%
Prefer not to say	117	6.68%
Unknown	10	0.57%
<b>Total</b>	<b>1,752</b>	<b>100.00%</b>



The table below shows that 1.43% (25 of 1,752) council homelessness applicants said their gender identity is not the same as their sex registered at birth.

Gender identity of clients ('Is your gender the same as the sex you were registered at birth?')	No. of clients	% of clients
No	25	1.43%
Prefer not to say	295	16.84%
Yes	1,411	80.54%
Unknown	21	1.20%
<b>Total</b>	<b>1,752</b>	<b>100.00%</b>

Analysis of people living in temporary accommodation undertaken in December 2023 shows that the proportion of female clients in temporary accommodation (59% using NECH data and 61% using HC data) is higher than for adult residents of Brighton & Hove as a whole (51%). A factor which is apparent here is the likely presence of children in a household, which gives a household priority need under the main housing duty. Data from Home Connections indicates that 921 (50%) were in households with children. Of the main applicants in households with children:

- 71% were female (651 of 921) compared to 52% of all clients (961 of 1,853)
- 17% were male (114 of 921) compared to 33% of all clients (607 of 1,853)
- 12% did not have their gender recorded or preferred not to say (114 of 921) compared to 13% of all clients (281 of 921).

Gender and Sex	NECH: No. of clients	NECH: % of clients	HC: No. of clients	HC: % of clients	HC: % of clients with data	2021 Census: no. of B&H residents	2021 Census: % of B&H residents
Female	1,058	59.07%	961	51.86%	61.13%	121,095	51.4%
Male	726	40.54%	607	32.76%	38.61%	114,280	48.6%
Non-Binary	4	0.22%	0	0.00%	0.00%	-	-
Other	3	0.17%	4	0.22%	0.25%	-	-
None or prefer not to say	0	0.00%	281	15.16%	-	-	-
<b>Total</b>	<b>1,791</b>	<b>100.00 %</b>	<b>1,853</b>	<b>100.00 %</b>	<b>100.00 %</b>	<b>235,375</b>	<b>100.0%</b>
Please note the 2021 Census data (green headed columns) is for usual residents aged 16 and over and was taken from the dataset for sex registered at birth.							

Of those who responded to this question (137/347) in the consultation on the draft Housing Strategy 2024 to 2029, 77 said they were Female, 43 Male, 4 Non-binary and 3 preferring to self-describe. Issues raised in relation to this protected characteristic included:

- There may be a conflict of rights in relation to inclusion and different protected characteristics. Need for balance and proportionality and use of exceptions in relation to the Equality Act.
- Women are disproportionately impacted by homelessness and there is a need to fund services supporting women at risk of becoming homeless and homeless women.
- Need to address specific needs of homeless and insecurely housed women who are experiencing, at risk of or traumatised by abuse, trafficking, being prostituted etc.
- Urgent need for a single sex and specialist women's refuge.

This protected characteristic has several intersections including, but not limited to, gender reassignment, sexual orientation, marriage and civil partnership, pregnancy and domestic and/or sexual abuse. This section should be read in conjunction with these other sections.

**See recommendation 2.**

## 5.6 Gender Reassignment:

<b>Does your analysis indicate a disproportionate impact relating to <a href="#">Gender Reassignment</a>?</b>	YES
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### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

To undergo gender reassignment usually means to undergo some sort of medical intervention, but it can also mean changing names, pronouns, dressing differently and living in their self-identified gender.

Gender reassignment is a characteristic that is protected by the Equality Act 2010, and it is further interpreted in the Equality Act 2010 approved code of practice. It is a term of much contention and is one that Stonewall's Trans Advisory Group feels should be reviewed.

The data from the Census 2021 and service data in section 5.5 above give some indication of the numbers of people in the city and those using housing services who have this protected characteristic.

The Trans Needs Assessment undertaken by the council in 2015 identified the following issues in relation to housing:

- Trans people have a high risk of homelessness
- There are significant gaps in knowledge amongst trans people and support organisations around their rights and eligibility for housing services
- Some trans people report poor experience of some homeless services, including safety concerns
- Training needs are indicated for housing staff
- A high proportion of trans people live in the private rented sector and many report poor experiences with letting agents
- Need to improve data collection in relation to gender reassignment and gender identity

Consultation on the housing strategy identified the following issues:

- Hate crime against trans people and the need for a zero -tolerance policy in social housing
- Safety issues in emergency and temporary accommodation
- Fear of discrimination when approaching services for support
- A clearer pathway for trans survivors of domestic abuse and sexual violence
- Needs of older trans people in residential and care settings
- The need for trans friendly housing in the city

This protected characteristic has several intersections including, but not limited to, gender reassignment, sexual orientation, marriage and civil partnership, pregnancy and domestic and/or sexual abuse. This section should be read in conjunction with these.

**See recommendation 2**



## 5.7 Sexual Orientation:

Does your analysis indicate a disproportionate impact relating to <a href="#">Sexual Orientation</a> ?	YES / NO
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### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

2021 Census data shows that more than one in ten residents aged 16 or over (10.6%, 25,375 people) identify with an LGB+ sexual orientation.

Profiling of council housing tenants in December 2023 is shown in the table below:

Sexual orientation	No. of tenants	% of tenants	% of tenants with data
Heterosexual/'Straight'	6,598	50.1%	90.4%
Gay	312	2.4%	4.3%
Bisexual	193	1.5%	2.6%
Lesbian	97	0.7%	1.3%
Another sexual orientation	100	0.8%	1.4%
Prefer not to say	1,438	10.9%	-
No data	4,426	33.6%	-
Total	13,164	100.00%	100.00%

The table below examines council data held on homelessness applications and assessments in 2022/23. Of these, 7.13% (125 of 1,752) had a sexual orientation other than Heterosexual / Straight.

Sexual orientation of client	No. of clients	% of clients
Applicant Prefers not to say	531	30.31%
Bisexual	11	0.63%
Gay / Lesbian	71	4.05%
Heterosexual / Straight	1,096	62.56%
Other sexual orientation	43	2.45%
<b>Grand Total</b>	<b>1,752</b>	<b>100.00%</b>

The table below looks at the sexual orientation of people in temporary accommodation. The analysis indicates that there are significant data gaps in reporting of sexual orientation on NEC Housing (72% have no data) and while the data is more comprehensive on Home Connection (5% have no data) the proportion who preferred not to say (37%) was much higher for clients recorded on HC when compared to all residents of Brighton & Hove.

Sexual orientation	NECH : No. of clients	NECH : % of clients	NECH : % of clients with data	HC: No. of clients	HC: % of clients	HC: % of clients with data	2021 Census: No. of B&H residents	2021 Census: % of B&H residents

Straight or Heterosexual	396	22.11 %	79.04 %	986	53.21 %	55.93 %	189,745	80.60%
Gay or Lesbian	18	1.01%	3.59%	46	2.48%	2.61%	13,726	5.83%
Bisexual	17	0.95%	3.39%	4	0.22%	0.23%	8,916	3.80%
Another sexual orientation	5	0.28%	1.00%	43	2.32%	2.44%	2,608	1.10%
Prefer not to say	65	3.63%	12.97 %	684	36.91 %	38.80 %	20,375	8.70%
No data	1,290	72.03 %	-	90	4.86%	-	-	-
Total	1,791	100.0 0%	100.0 0%	1,853	100.0 0%	100.0 0%	235,370	100.0%
Please note the 2021 Census data (green headed columns) is for usual residents aged 16 and over.								

**There is a need to improve data collection and analysis by housing services in relation to sexual orientation as set out in Recommendation 1.**

Of those who responded to the housing strategy consultation 122 people described their sexual orientation as Heterosexual/straight, 22 as Gay, 24 as Bisexual, 2 as Lesbian, 6 preferred to use another terms. A response was also received from Brighton & Hove LGBT Switchboard. Issues raised in relation to sexual orientation included:

- Low priority given to LGBTQ+ housing needs, safety and health/wellbeing
- Impact of hate crime and the need for a zero-tolerance approach
- LGBTQ+ training for housing services staff
- Better engagement and consultation with LGBTQ+ communities
- Safety in emergency and temporary accommodation
- Specialist housing support and clearer pathways for LGBTQ+ people
- Understanding and consideration of impact of intersectionalities with other protected characteristics e.g Age, Disability or Ethnicity

Attention was drawn to the 2009-14 LGBT Housing Strategy and the 2023 LGBT Housing Manifesto, with a call for the priorities to be reflected in the new housing strategy. The LGBT Housing Manifesto calls for

- LGBT specific housing for all life stages
- LGBT specific housing information and support
- Awareness training for commissioners and a quality standard for inclusive providers
- Embedding intersectional needs in future planning
- High quality data monitoring around sexual orientation and trans status

This protected characteristic has many intersections including. This section should therefore be read in conjunction with other parts of this EIA.

**See recommendation 2.**

## 5.8 Marriage and Civil Partnership:

Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?	NO
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If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the Census 2021 indicates that when the census was taken, 115,815 adults in the city had never married or entered a civil partnership, 76,927 were married, 4699 were separated but still legally married or in a civil partnership, 20,382 had divorced or civil partnership dissolved, and 9,352 were widowed or a surviving civil partner.

Housing service data was not available for this protected characteristic.

The council's equality monitoring does not require collection of data in relation to this protected characteristic.

### 5.9 Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum):

<b>Does your analysis indicate a disproportionate impact relating to Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)?</b>	YES
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#### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Census does not collect data on this protected characteristic nor is data routinely collected by council housing services. Analysis of case notes for homelessness applications and assessments during 2022/23, indicate that 1.94% of applicants have references to pregnancy associated with their application. The council's equality monitoring does not require collection of data in relation to this protected characteristic.

During informal engagement during the development of the housing strategy 2024 to 2029 our attention was drawn to the lack of local temporary accommodation for young pregnant women. This results in placements out of area with loss of family and other support networks.

**See recommendation 2**

### 5.10 Armed Forces Personnel, their families, and Veterans:

<b>Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?</b>	YES
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#### If "YES", what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The 2021 Census estimates that there are 5,618 people in Brighton and Hove who have previously served in the armed forces. This is around 2.4% of the population.

Analysis of data on homelessness applicants in 2022/23 indicates that 0.17% of applicants were recorded as having served in the armed forces.

There are no military establishments in the Brighton and Hove and only around 10 MOD employees stationed in the city. The SHMA 2023 includes anecdotal evidence that the city attracts a number of

LGBTQ+ service leavers. It argues that the most acute and pressing housing issue is likely to be finding accommodation for those transitioning out of the forces.

A review of the literature on homelessness amongst veterans conducted by the Royal British Legion indicates falling numbers of former service personnel in the homeless population, however the percentage of homeless veterans is still higher than for the general population. Homeless veterans have been found on average to be older, be sleeping rough and have slept rough for longer, be less likely to use drugs and more likely to have alcohol-related problems. Post Traumatic Stress Disorder (PTSD) has been found among a small number of homeless veterans although other non-military related mental health problems were more common.

Of those responding to the housing strategy consultation 1 respondent indicated they had served in the armed forces. Issues raised relating to this protected characteristic included:

- Need for dedicated transitional and permanent supportive housing for veterans
- Increased priority on council housing waiting lists for former service members
- Housing assistance and homelessness prevention services specifically for veterans
- Coordinated support between veteran service organizations, NHS services, and housing providers
- Community integration programs to prevent isolation and enable independent living

**See recommendation 2.**

#### 5.11 Expatriates, Migrants, Asylum Seekers, and Refugees:

**Does your analysis indicate a disproportionate impact relating to Expatriates, Migrants, Asylum seekers, Refugees, those New to the UK, and UK visa or assigned legal status? (Especially considering for age, ethnicity, language, and various intersections)**

YES

#### **If “YES”, what are the positive and negative disproportionate impacts?**

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The Census 2021 indicates that 54,342 residents of Brighton & Hove were born outside the United Kingdom. This is 19.6% of the usual resident population of the city. Of these, most (28,524) had lived in the UK for 10 years or more. 7,926 had lived in the UK for less than 2 years.

Analysis of homelessness applicants from 2022/23 examines the nationality of the 1,752 clients. Of these, 18.37% (322 of 1,752) were nationals of a country other than the UK. In addition, the data held on support needs identifies 1.08% (19 of 1,752) clients as former asylum seekers.

Housing for asylum seekers is the responsibility of the Home Office. Once granted leave to remain, refugees are expected to find their own accommodation within 28 days. As a rule, refugees fall into a class of persons subject to immigration control who are eligible for housing assistance. Individuals leaving Home Office accommodation may not have sufficient funds to secure private rented housing without additional help. Because asylum seekers are not permitted to work, saving for a deposit may act as a barrier. Processing benefit applications can take longer than 28 days. Furthermore, it can take time to receive a National Insurance number and this can delay entry to the workforce. These factors mean that refugees can be at increased risk of homelessness.

Under the Children Act 1989, local authorities are responsible for asylum applicants below the age of 18 who arrive in the UK unaccompanied and do not have adult close family members already in the UK whom they could join. Support may involve the provision of food, accommodation, foster carers, leisure, language assistance and trauma counselling.

The consultation on the draft housing strategy identified specific vulnerabilities in this group including the risk of trafficking and modern-day slavery.

As well as the intersections identified in the header of this section, consideration should also be given to homelessness, domestic and/or sexual abuse and violence survivors, people in vulnerable situations and human rights and this section should be read in conjunction with these.

The needs of Expatriates, Migrants, Asylum Seekers, and Refugees should be explicitly considered in the implementation of the strategy with a particular emphasis on the needs of refugees and asylum-seeking children in relation to Priority 3 Prevent homelessness and meet housing need.

**See recommendation 2.**

### 5.12 [Carers](#):

**Does your analysis indicate a disproportionate impact relating to [Carers](#) (Especially considering for age, ethnicity, language, and various intersections).**

YES

#### **If “YES”, what are the positive and negative disproportionate impacts?**

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Data from the Census 2021 indicates that 20,804 people in the city provide unpaid care for someone who has long-term physical or mental ill-health conditions, illness or problems related to old age. Carers can include people who have care needs themselves or be young carers looking after a parent or other family member.

Data on this protected characteristic is not recorded in the data held on homelessness applications and assessments in a structured way that can readily be analysed. However, 1.43% of clients (25 of 1,752) appear to have references to carers in the notes associated with their application. Other services do not hold relevant data.

20 people who responded to the housing strategy consultation said that they were a carer. One respondent pointed out that without unpaid carers, many people with support needs would not manage to live independently with the limited offer available from statutory services.

This protected characteristic has intersections with those identified in the header as well as others. Many unpaid carers face financial hardship and socio-economic disadvantage as caring may limit their ability to fully take part in the labour market.

### 5.13 Looked after children, Care Leavers, Care and fostering experienced people:

**Does your analysis indicate a disproportionate impact relating to Looked after children, Care Leavers, Care and fostering experienced children and adults (Especially considering for age, ethnicity, language, and various intersections).**

YES

**Also consider our [Corporate Parenting Responsibility](#) in connection to your activity.**

### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Some 360 children and young people are looked after by the council. There are many others in the city who are care and fostering-experienced. Analysis of housing register data for the SHMA 2023 indicated that some 72 households (1.6%) on the housing register were care leavers.

Analysis of homelessness applicants support needs (at the time of their assessment in 2022/23) includes two categories identifying care leavers (the latter is no longer be in use).

- Care leaver aged 18-20 years: 1.14% (20 of 1,752)
- Care leaver aged 21+ years: 1.48% (26 of 1,752)

Research undertaken by Centrepoin in 2017 indicates that care leavers experience additional challenges on leaving care including:

- Difficulty managing money
- They are unable to afford to rent
- They may have to move to an unfamiliar area
- They have to get used to less support
- Higher risk of losing their tenancy and becoming homeless

8 people who responded to the housing strategy consultation indicated that they had been looked after by a local authority. Issues raised in relation to care experience included:

- Importance of the council’s corporate parenting role
- Risk of care leavers being deemed intentionally homeless when their behaviours and trauma impact relationships and management of tenancies.
- Calls for care leavers to maintain their priority until they are 25

**See recommendation 2**

### 5.14 Homelessness:

**Does your analysis indicate a disproportionate impact relating to people experiencing homelessness, and associated risk and vulnerability? (Especially considering for age, veteran, ethnicity, language, and various intersections)**

YES

### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

In February 2024 more than 1,700 households were living in temporary and emergency accommodation in the city. 472 households were prevented from becoming homeless in 2023. 52 people were sleeping rough on official count night in November 2023

Intersections between homelessness and protected characteristics are identified in other sections of this equality impact assessment. Two categories of risk in relation to protected characteristics and their intersections need to be highlighted here: the risk of becoming homeless and increased risk when homeless. Other factors, not related to characteristics protected under the Equality Act 2010, are also likely to compound risk, for example, substance misuse, educational achievement, and personal circumstances. A **data led approach** to risk profiling and service development means that measures to



improve and use equalities and other data as set out **Recommendation 1** will be key to successful delivery.

14 people who responded to the housing strategy consultation identified themselves as living in temporary or emergency accommodation, staying with friends and other forms of short term or insecure housing. Responses were also received from a number of organisations who provide support to people who are homeless or at risk of becoming homeless. Issues raised in the consultation included:

- Need for financial and benefits advice to help prevent financial difficulties resulting in homelessness
- Identification of risk of homelessness plus early intervention / prevention
- Need for trauma/psychologically informed practice and training for staff
- Funding for organisations working with homeless people being reduced
- Support for innovative approaches to housing homeless people
- Systems and processes e.g. bidding for housing are complex and hard to understand for many people
- Intersection of homelessness with protected characteristics e.g. LGBTQ+
- Importance of partnership working to tackle increasing homelessness

Measures set out in the Housing Strategy 2024 to 2029 are likely to positively impact this group. Work to strengthen and improve homelessness services and the development of a new homelessness and rough sleeping strategy offer further opportunities for improvement.

**See recommendations 6 and 7**

#### 5.15 Domestic and/or Sexual Abuse and Violence Survivors, people in vulnerable situations:

<b>Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?</b>	YES
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#### If “YES”, what are the positive and negative disproportionate impacts?

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Analysis conducted in December 2023 on people living in temporary accommodation in the city indicated that 8.3% of all clients stated that the main reason for loss of settled accommodation was being the victim of domestic abuse. This percentage was higher (10.6%) amongst Black or racially minoritised clients.

The consultation on the draft housing strategy 2024 to 2029

- Lack of provision for survivors and people fleeing domestic abuse locally.

Consultees also pointed out that the draft strategy failed to refer to the Domestic Abuse Act (2021), which requires local housing authorities to provide support and safe accommodation for victims of domestic abuse. The strategy has been amended to reflect this statutory duty.

**See recommendations 2 and 9**

#### 5.16 Socio-economic Disadvantage:

<b>Does your analysis indicate a disproportionate impact relating to Socio-economic Disadvantage? (Especially considering for</b>	YES
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age, disability, D/deaf/ blind, ethnicity, expatriate background, and various intersections)

**If “YES”, what are the positive and negative disproportionate impacts?**

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

Lack of affordable housing in the city negatively impacts people at socio-economic disadvantage. Poor housing conditions also impact the health and wellbeing of low-income households. Inadequate insulation contributes to higher energy bills. This is likely to intersect with other characteristics (e.g. older people, young people, people from racially minoritised groups and people with disabilities amongst others are more likely to have lower household income). Proposals in the strategy are likely to have positive impacts, for example, measures to increase the energy efficiency of properties are likely to reduce or mitigate energy bills.

**5.17 Human Rights:**

Will your activity have a disproportionate impact relating to Human Rights?

YES

**If “YES”, what are the positive and negative disproportionate impacts?**

Please share relevant insights from data and engagement to show how conclusions about impact have been shaped. Include relevant data sources or references.

The right to adequate housing is a human right recognized in international human rights law. Without a right to housing, many other basic rights are compromised, including the right to family life and privacy, the right to freedom of movement, the right to assembly and association, the right to health, and the right to development. Adequate housing is essential for human survival with dignity. The right to adequate housing is defined by the United Nations as the right to live somewhere in security, peace, and dignity.

The vision of ‘Homes for everyone’ and the council’s goal to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove are set out in the Council Plan 2023 to 2027 and the Housing Strategy 2024 to 2029. These articulate the council’s commitment to housing as a human right. Specific measures in the strategy to improve the quality of housing, to prevent homelessness and to support those in housing need are therefore likely to have a positive impact on human rights.

**5.17 Cumulative, multiple [intersectional](#), and complex impacts (including on additional relevant groups):**

**What cumulative or complex impacts might the activity have on people who are members of multiple Minoritised groups?**

- For example: people belonging to the Gypsy, Roma, and/or Traveller community who are also disabled, LGBTQIA+, older disabled trans and non-binary people, older Black and Racially Minoritised disabled people of faith, young autistic people.
- Also consider wider disadvantaged and intersecting experiences that create exclusion and systemic barriers:
  - People experiencing homelessness
  - People on a low income and people living in the most deprived areas
  - People facing literacy and numeracy barriers



- Lone parents
- People with experience of or living with addiction and/ or a substance use disorder (SUD)
- Sex workers
- Ex-offenders and people with unrelated convictions
- People who have experienced female genital mutilation (FGM)
- People who have experienced human trafficking or modern slavery

Intersections and complex impacts are considered in the sections above. Given the nature of such a wide-ranging strategy, it has not been possible to identify and consider all such intersections. A number of key issues not considered above include:

**Compound multiple needs** – An assessment carried out as part of the Joint Strategic Needs Assessment programme in 2020 identifies that around 90% of this population are homeless, with most having a significant history of rough sleeping. The SHMA 2023 identifies a gap in accommodation for people with multiple complex/compound needs, noting that this is an extremely challenging cohort to house. The strategy and Y1 action plan commit the council to work with partners to improve services and support for people with multiple, compound needs (HS34)

People with some protected characteristics and intersections are at higher risk of exploitation and harm, for example, cuckooing or modern slavery. This includes, but is not limited to, care leavers, people with learning disabilities, or people with mental health issues. The increased complexity and level of need of those placed in social housing or living in the private rented sector is noted in the SHMA 2023 and was also raised by respondents to the housing strategy consultation.

**See recommendations 8 and 9**

## 7. Action planning

**Which action plans have the actions identified in the previous section been transferred to?**

- For example: FIAP (Fair and Inclusive Action Plan) – mandatory noting of the EIA on the Directorate EIA Tracker to enable monitoring of all equalities related actions identified in this EIA. This is done as part of FIAP performance reporting and auditing. Speak to your Directorate's Business Improvement Manager (if one exists for your Directorate) or to the Head of Service/ lead who enters actions and performance updates on FIAP and seek support from your Directorate's EDI Business Partner.

Actions to address the recommendations of this equality impact assessment have been included in the action plan for the housing strategy 2024 to 2029. They are identified in this EIA using their ID number in the action plan.

See also recommendation 10: to ensure that the recommendations of this EIA are reflected in the action plan to deliver the Social Housing Regulator's Transparency, Influence and Accountability Consumer Standard.

**What SMART actions will be taken to address the disproportionate and cumulative impacts you have identified?**

- Summarise relevant SMART actions from your data insights and disproportionate impacts below for this assessment, listing appropriate activities per action as bullets. (This will help your Business Manager or Fair and Inclusive Action Plan (FIAP) Service representative to add these to the Directorate FIAP, discuss success measures and timelines with you, and monitor this EIA's progress as part of quarterly and regular internal and external auditing and monitoring)

**Recommendation 1:** The collection and analysis of equality data by housing services should be reviewed and, where required, improved. This included reviewing the systems used to collect and analyse equalities data. The Year 2 (2025/26) action plan for the strategy should contain an explicit action to ensure that this is addressed.

**Recommendation 2:** In implementing the strategy, and in planning and delivering housing and support services, particular consideration should be given to impacts on:

older adults

children, young people and their families

disabled people with additional focus on disabled children and young adults and disabled people 65+ (Y1 action plan actions are identified in the relevant section)

people from Black and racially minoritised groups including gypsies, Roma and travellers

Gender Identity and Sex

Gender Reassignment

LGBT+ people

Pregnant people

Current and former armed forces personnel

Refugees and asylum-seeking children

Domestic and/or Sexual Abuse and Violence Survivors and people in vulnerable situations

Specific issues, considerations and key intersections are identified in the relevant sections

**Recommendation 3:** that the housing needs of the city's Black and racially minoritised groups (including Gypsy, Roma and Travellers) are assessed in year 2 of the strategy action plan and plans put in place to address any negative disproportionate impacts identified.

**Recommendation 4:** When future housing needs assessments are commissioned, consideration of ethnicity, 'Race', ethnic heritage and its intersections should be included in the specification.

**Recommendation 5:** that Black and racially minoritised groups are explicitly considered in the development of the new homelessness and rough sleeping strategy identified as action HS17 in the Year 1 action plan for the housing strategy.

**Recommendation 6:** that the findings of this equality impact assessment and the data and needs assessments that have informed it are incorporated into the needs assessment for the new homelessness and rough sleeping strategy (HS17 in Y1 action plan).

**Recommendation 7:** use the development of a new homelessness and rough sleeping strategy to review and strengthen partnership arrangements for tackling homelessness in the city (HS17 and HS35 in the Y1 action plan).

**Recommendation 8: that the needs of people with multiple, compound needs are explicitly considered in the implementation of the strategy with a particular emphasis on Priority 3 Prevent homelessness and meet housing need. This is identified as action HS34 in the Y1 action plan.**

**Recommendation 9: that risk of exploitation and harm is explicitly considered in the implementation of the strategy and in the development of services for people at higher risk due to specific or intersecting characteristics.**

**Recommendation 10: ensure that the recommendations in this EIA are reflected in the action plan to deliver the Social Housing Regulator's Transparency, Influence and Accountability Consumer Standard.**

## 8. Outcome of your assessment

What decision have you reached upon completing this Equality Impact Assessment? (Mark 'X' for any ONE option below)

<b>Stop or pause</b> the activity due to unmitigable disproportionate impacts because the evidence shows bias towards one or more groups.	
<b>Adapt or change</b> the activity to eliminate or mitigate disproportionate impacts and/or bias.	
<b>Proceed</b> with the activity as currently planned – no disproportionate impacts have been identified, or impacts will be mitigated by specified SMART actions.	<b>X</b>
<b>Proceed with caution</b> – disproportionate impacts have been identified but having considered all available options there are no other or proportionate ways to achieve the aim of the activity (for example, in extreme cases or where positive action is taken). Therefore, you are going to proceed with caution with this policy or practice knowing that it may favour some people less than others, providing justification for this decision.	

If your decision is to "Proceed with caution", please provide a reasoning for this:

**Summarise your overall equality impact assessment recommendations to include in any committee papers to help guide and support councillor decision-making:**

This equality impact assessment considers the implications of proposals set out in the draft housing strategy 2024 to 2029. The strategy is intended to be a high-level document, setting out the principles and priorities to achieve the council's ambitious goal to deliver accessible, affordable and high-quality homes for everyone in Brighton & Hove. If that goal is achieved, then the strategy will have a positive impact on people with the protected and other characteristics considered in this EIA.

The EIA identifies several factors relating to protected characteristics and their intersections which impact housing need. The council can directly influence those factors relating to its statutory duties and its other services. There are other factors where it needs to work in partnership to deliver improved outcomes. Given the breadth and nature of the strategy, it has not been possible to identify the equality impact of specific proposals therefore separate equality impact assessments will need to be undertaken in line with

council policy on all service development and change proposals undertaken as part of the implementation of the strategy.

## 9. Publication

All Equality Impact Assessments will be published. If you are recommending, and choosing not to publish your EIA, please provide a reason:

## 10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Martin Reid, Interim Corporate Director, Housing, Care & Wellbeing, Housing lead	12-Sep-24
Accountable Manager:	Diane Hughes, Head of Strategy & Supply	12-Sep-24

Notes, relevant information, and requests (if any) from Responsible Lead Officer and Accountable Manager submitting this assessment:

## EDI Review, Actions, and Approval:

### Equality Impact Assessment checklist and sign-off

**EIA Reference number assigned:** HCW107-12-Sep-2024-Housing-Strategy-24-29

EDI Business Partner to cross-check against aims of the equality duty, public sector duty and our civic responsibilities the activity considers and refer to relevant internal checklists and guidance prior to recommending sign-off.

Once the EDI Business Partner has considered the equalities impact to provide first level approval for by those submitting the EIA, they will get the EIA signed off and sent to the requester copying the Head of Service, Business Improvement Manager, [Equalities inbox](#), any other service colleagues as appropriate to enable EIA tracking, accountability, and saving for publishing.

Signatory:	Name:	Date: DD-MMM-YY
EDI Business Partner:	Jamarl Billy	Reviewed prior to leaving the organisation
EDI Manager:	Sabah Holmes	12-Sep-24
Head of Communities, Equality, and Third Sector (CETS) Service: (For Budget EIAs/ in absence of EDI Manager/ as final approver)	N/A	

**Notes and recommendations from EDI Business Partner reviewing this assessment:**

**Notes and recommendations (if any) from EDI Manager reviewing this assessment:**

**Notes and recommendations (if any) from Head of CETS Service reviewing this assessment:**



# Brighton & Hove City Council

## Cabinet

## Agenda Item 63

**Subject:** Improving Housing Services: Responding to the Regulator for Social Housing's Judgement

**Date of meeting:** 26 September 2024

**Report of:** Cabinet Member for Housing and New Homes

**Contact Officer:** Justine Harris, Interim Assistant Director Housing Management

**Email:** justine.harris@brighton-hove.gov.uk

**Ward(s) affected:** All Wards

**Key Decision:** Yes

**Reason(s) Key:** It is significant in terms of its effect on communities living or working in an area comprising of two or more wards.

### 1. Purpose of the report and policy context

- 1.1 This report responds to the recent Regulatory Judgement by the Regulator of Social Housing (RSH). This judgement follows a period of engagement during which the Council shared information on our backlog of routine repairs and our Housing, Health & Safety Compliance Review. RSH considered the information in line with their new enhanced consumer regulation process (effective from 1st April 2024) and identified serious failings in the Safety and Quality compliance category in the areas of health & safety and the routine repairs backlog. These are significant challenges that we are addressing with urgency. This report outlines our progress and the work that remains to meet regulatory requirements.
- 1.2 We recognise the seriousness of the situation. Progress has been made, and a strategy is in place to address these challenges. Updates are provided in this report on areas of concern raised by RSH, including: electrical safety; provision of smoke detection; water safety; fire safety remediation actions and the backlog in routine repairs. We have also provided information on other areas of Safety and Quality (gas & fuel, asbestos, lifts and lifting equipment) and other areas of compliance.
- 1.3 These actions will ensure full compliance with building safety and quality standards under the Building Safety Act and Social Housing (Regulation) Act 2023. We are committed to meeting these regulatory requirements, emphasising our priority of ensuring the health & safety of our residents and those who visit and work on our homes.

- 1.4 This report follows previous Housing, Health & Safety Update reports considered by the Housing and New Homes Committee in June 2023, September 2023, January 2024 and March 2024 and by Cabinet in June 2024.
- 1.5 Improving the quality of our homes and ensuring that the Council complies with new social housing regulations is a key action toward delivery of the Homes for everyone Council Plan priority.

## **2. Recommendations**

That Cabinet:

- 2.1 Note the Regulator of Social Housing Regulatory Judgement, following responsive engagement with the Council, that there are serious failings in how the Council is delivering on the standard of Safety and Quality, and that significant improvement is needed.
- 2.2 Note the update on progress on actions being undertaken toward Safety & Quality compliance to address the Regulator's concerns, meet our statutory and regulatory obligations, and improve housing services for our residents.
- 2.3 Agrees Overview & Scrutiny oversight arrangements as set out in section 6 of this report.

## **3. Context and background information**

### **The Regulator of Social Housing Regulatory Judgement**

- 3.1 Following the Grenfell Tower tragedy there have been significant legislative and regulatory changes impacting social landlords. In anticipation of these changes, the Housing service undertook a Housing Health & Safety Compliance Review of our approach to health & safety compliance and assurance for council homes. The Housing & New Homes Committee considered reports on the outcomes, action plan, resourcing and progress arising from this Review in June and September 2023 with further reports considered at Committee meetings in January and March 2024. Cabinet considered a Housing, Health & Safety Update report in June 2024. These reports included reference to and updates on engagement with the RSH.
- 3.2 On 9 August 2024 the RSH issued a judgement for Brighton & Hove City Council to confirm a consumer grading of C3. The judgement identifies serious failings in the Council's performance against the Safety and Quality Standard.
- 3.3 Responsive engagement began with the Regulator in October 2023 following a Housing & New Homes Committee report concerning plans to address the backlog of routine repairs to council homes. The Council provided the Regulator with additional information highlighting concerns regarding health and safety compliance arising from our Housing, Health & Safety Review as



reported to Housing & New Homes Committee. The judgement is based on a review of documents, data, and these discussions.

- 3.4 The RSH has identified that Council has failed to meet health and safety regulatory requirements in the following areas: electrical safety; provision of smoke detection; water safety; and fire safety actions. Additionally, there is a significant backlog in routine repairs. These failings necessitate substantial improvement.
- 3.5 The Council is in ongoing intensive engagement with the Regulator to monitor progress in addressing these issues. Although enforcement powers are not currently being used, the situation will remain under review to ensure tenant safety and compliance with standards.
- 3.6 The published Regulator's report is linked in Appendix A.

### **Addressing these challenges**

- 3.7 We have established a comprehensive cross directorate Corporate Housing Building Safety Programme, including reporting into Corporate Leadership Team. Detailed tracking of all compliance actions allows us to manage risks effectively and demonstrate progress across five key workstreams: Fire Safety, Water Safety, Gas & Fuel, Electrical Safety, Lifts and Lifting and Asbestos. In addition, we are also tracking compliance with provision of smoke and carbon monoxide detection as well as progress with addressing the backlog of routine repairs.
- 3.8 We have adopted a risk-based approach to inspections and following remedial actions, prioritising properties based on the severity of identified risks. This strategy ensures that high-risk issues are addressed first, while also providing a clear timeline for completing lower-risk actions. This approach is designed to give confidence that we are managing our compliance obligations in a structured and effective manner.
- 3.9 Our monitoring framework includes regular updates to the RSH. With regard to compliance with the wider building safety and fire safety requirements we are also engaging with other regulatory bodies we are accountable to, including East Sussex Fire and Rescue Authority and the Health and Safety Executive/ Building Safety Regulator.
- 3.10 Within the Council, officers are monitoring and supporting progress through the Housing Compliance Board and the Corporate Modernisation Board. Regular reporting to the Corporate Strategic Risk SR 32 ensures that progress is monitored at the highest level, with risks and challenges escalated as necessary. The Housing Building Safety Project remains a critical component of our Corporate Strategy, reflecting the importance of these initiatives to the entire organisation.
- 3.11 In order to ensure Executive oversight, additional arrangements are being put in place via regular reports to Leadership and lead Cabinet member.

## Update on progress on areas of non-compliance identified by RSH.

- 3.12 **Fire Safety Compliance:** Fire safety remains a top priority. We have achieved 100% compliance in Fire Risk Assessments (FRAs) for all 68 high-risk buildings, these are assessed annually. The Council has also completed fire risk assessments for 569 non-high-risk buildings. For our 46 high-rise residential blocks, we have implemented detailed block-by-block action plans, provided the East Sussex Fire & Rescue Service (ESFRS) with essential building information, and ensured that wayfinding signage, premises information boxes and other compliance measures are in place.
- 3.13 In order to ensure ongoing compliance and that we have a full set of up to date risk assessments for all our properties, we have commissioned a contractor to undertake a full new set of FRAs on both our high risk and lower risk buildings. These 2nd phase FRAs are those completed under new Tersus contract, with the same buildings covered by the existing FRAs. There is still work to do on completion of these 2<sup>nd</sup> phase FRAs for non-high-risk buildings, with 57% of FRAs complete by July 2024. However, we are on track to have completed 2<sup>nd</sup> phase FRAs for all buildings by the end of December 2024.
- 3.14 We have advised the RSH that we will follow up on the FRA remediation actions once we have completed review and reconciliation of the new FRAs and actions arising. The figures outlined below show the new remediation actions arising from the 2024 FRAs and while these are outstanding a portion of them will not be overdue. We are currently categorising and analysing these remediation actions, so we are clear on timelines they have to be completed within and preparing a dashboard to enable tracking of completed actions. Additional contractor capacity is being deployed to work alongside Council teams to undertake these remediation actions.

*\*Figures highlighted in italics show those previously shared with the regulator*

Compliance Indicator	Feb 24	April 24	June 24	July 24
FRAs in high risk buildings (% of buildings)	<b>100%*</b>	<b>100%</b>	100%	100%
FRAs in non-high risk buildings: 1st phase (% of buildings)	<b>99.8%</b>	<b>100%</b>	100%	100%
FRAs in non-high risk buildings: 2nd phase (% of buildings)	-	-	20.9%	57.0%
FRA remediation actions (snapshot number of live actions)	<b>1,748</b>		4,253	6,472

- 3.15 **Electrical Safety:** The Council has made significant investments in setting up a dedicated Electrical Testing & Compliance Team, with a goal of retesting all domestic and communal properties within three years (by December 2026) and then permanently maintain a 5-year testing cycle. As of our latest update,

55.8% of domestic properties have a valid Electrical Installation Condition Report (EICR) within the last 5 years and 73.7% within the last 10 years.

- 3.16 By way of risk mitigation, the priorities for the domestic electrical testing programme are: Priority 1 - properties with an unsatisfactory certificate; Priority 2 - properties with no certification; Priority 3 - all properties based on age of certification, starting with the oldest first. In undertaking our electrical testing programme, we ensure that all risk actions are remediated and resolved before issuing an electrical safety certificate. All Category 1 (C1) hazards are immediately repaired or isolated, ensuring no immediate danger remains. In addition to the figures provided on our progress with our current electrical testing programme our records show 87% (10,493 of 12,013) dwellings have satisfactory certification issued since our records began in 2007.
- 3.17 To establish and ensure full compliance, the Electrical Testing & Compliance Team is re-testing all communal areas on a risk-based priority by Dec 2026. By way of risk mitigation, the priorities of the communal electrical testing programme are: Priority 1 - Communal supplies in high rise blocks (target date for completion December 2024); Priority 2 – Communal supplies in blocks that are conversions for residential use (target date for completion- December 2024). In the addition to the figures provided we have advised RSH that we hold electrical certification for 551 (71%) of 775 communal areas identified as of 25th April 2024.

<b>Compliance Indicator</b>	<b>Feb-24</b>	<b>Apr-24</b>	<b>June-24</b>	<b>Jul-24</b>
5 Year EICR domestic testing (% of homes)	<b>42.9%</b>	<b>49.1%</b>	53.0%	55.8%
10 Year EICR domestic testing (% of homes)	<b>66.6%</b>	<b>70.1%</b>	72.0%	73.7%
Communal EICRs (% of communal areas)	<b>5.3%</b>	<b>14.0%</b>	20.8%	22.0%

- 3.18 **Water Safety:** In April 2024 we advised RSH that given the issues in the performance of our water safety contract, we cannot rely on the figures previously provided. We advised that we had asked another contractor Ridge to review and validate these figures to assure the Council of their accuracy before presenting them to the RSH as our final position. We continue to validate figures. Our current contractor has been instructed to focus on reviews and remedial actions in high-risk blocks. Additional contractor capacity is currently being procured to provide new water risk assessments. Three contractors have been approached with a view to mobilise in September / October 2024 via a procurement waiver. Re-tendering the water safety contract, separating risk assessment from completion of remediation actions, is being taken forward as a priority. For July 2024 we can report the following with regard to water risk assessments:

- Water risk assessments (% of water systems covered) - 79.0%.
- Water risk assessments (% of dwellings covered) – 35.1%.

- 3.19 **Smoke Detection:** In addition to battery powered smoke detection, we have a programme to install hard wired smoke detection in all homes by Dec 2026. We have written to all residents living in homes that according to our records do not have hard wired smoke detection requesting them to contact us to arrange an appt to install detection.

Compliance Indicator	Feb 24	April 24	June 24	July 24
Smoke alarms/detectors (% of homes)	<b>50.8%</b>	<b>77.0%</b>	81.5%	83.6%

- 3.20 **Routine Repairs:** Current jobs with our two contractors procured to reduce the backlog of routine repairs have reduced from 6,476 in June 2024 to 5,309. Our draft Q1 performance report for 2024/25 on routine repairs indicates that of the 2,829 newer jobs issued on or after 1st April 2024, 77.0% (2,330 of 3,025) were completed within 28 days, which is above the 70% target.

Compliance Indicator	Feb 24	April 24	June 24	July 24
Routine repairs jobs open for more than 28 days			9,653	7,250

**Other health & safety measures – not subject to the regulatory judgement.**

- 3.21 **Gas Safety:**

Compliance Indicator	Feb-24	Apr-24	June-24	Jul-24
Communal Boilers	<b>100%</b>	<b>100%</b>	100%	100%
Domestic Dwellings	<b>99.99%</b>	<b>99.99%</b>	99.97%	100%

- 3.22 **Carbon Monoxide Detection/Alarms:** 223 properties require a carbon monoxide (CO) alarm (non-compliant). Of these, 119 have an installation appointment already in place, and in 104 properties access has not yet been gained. These are to undergo a gas safety inspection over the next 3 months. All new build properties with gas appliances will have a CO detector installed and any buy back or other purchased properties will have a detector installed as part of the empty home inspection.

Compliance Indicator	Feb-24	Apr-24	June-24	Jul-24
Domestic Dwellings	<b>71.7%</b>	<b>98%</b>	97.79%	99.32%

- 3.23 **Asbestos Safety:** Management surveys have been undertaken within 616 blocks that had required an asbestos survey: 71 blocks have no asbestos items identified, which leaves a re-inspection programme of 545 properties. These are re-inspections of the condition of any asbestos containing material within the non-domestic areas.

Compliance Indicator	Feb-24	Apr-24	June-24	Jul-24
Common way surveys completed	<b>85%</b>	<b>98.9%</b>	99.4%	99.8%

- 3.24 **Lifts and Lifting equipment:**

Compliance Indicator	Feb-24	Apr-24	June-24	Jul-24
Communal (Passenger) lifts servicing	<b>100%</b>	<b>100%</b>	100%	100%
Domestic lift and stair lift, equipment servicing	<b>100%</b>	<b>100%</b>	100%	100%

## 4. Other Consumer Standards

- 4.1 As well as Safety and Quality (within the Home Standard), there are three further Consumer Standards landlords must deliver against in order to be compliant. The Council has not yet been assessed by the RSH on these standards. They are: Tenant Involvement and Empowerment, Tenancy Standard and the Neighbourhood and Community Standard. More information is provided in our report on Tenant Involvement later in section 7 of this report.
- 4.2 Some expectations are evidenced by data, and others require evidence such as meetings and decisions; policies and procedures; and explanatory narrative. A gap analysis of all specific expectations against the Consumer Standards and the accompanying Code of Practice has been carried out within Housing.
- 4.3 A programme of work is underway to address gaps in delivery or evidence. Areas for improvement are:
- Engagement: create more meaningful opportunities for a diverse range of tenants to scrutinise and influence services.

- Complaints and tenant insights: improving performance and a unified response, analysis and better use of feedback to improve.
- Equity: deeper understanding of our tenants and their needs and ensuring this is reflected in the services provided.
- Data: quality assurance and using data to more proactively to inform service provision.

## **5. Analysis and consideration of alternative options**

- 5.1 The chosen approach — accelerating compliance actions through targeted resource allocation and enhanced internal oversight – is identified as the most effective way to reach compliance. This strategy ensures rapid progress while maintaining the Council’s accountability and direct management of safety and compliance initiatives.

## **6. Overview and Scrutiny Committee involvement & oversight**

- 6.1 Following the Regulatory Judgement, we wish to engage with Overview & Scrutiny in order to provide oversight of planning and progress toward regulatory compliance.
- 6.2 There are elements contained in this report which relate to the Housing remits of both Place and People Overview & Scrutiny Committees. However, most of the actions that the Council will take in response to the Regulator’s judgement will be focused on issues of maintenance and repair, which sit within the Terms of Reference for Place Overview & Scrutiny Committee.
- 6.3 We propose to include this work as a regular item on the agenda for the Place Overview & Scrutiny Committee to ensure cross party scrutiny of the Council’s actions in response to the Regulator’s findings. We propose to invite People Overview & Scrutiny members to attend for this item, as there are important areas of work which sit within the remit of People Overview & Scrutiny Committee, particularly around tenant engagement. This will ensure transparent and focused overview and scrutiny of the Council’s response to the Judgement.

## **7. Community Engagement and Consultation**

- 7.1 We are committed to and understand the importance of involving residents in our compliance efforts. Regular updates are being provided through Housing Area Panels, the Council Tenant Annual Conference, and the quarterly tenant publication *Homing In*. Our focus is on ensuring that residents are informed of both our progress and any ongoing issues that may affect them. We continue to engage residents proactively ensuring they are aware of safety measures and know how to report concerns. This approach is key to rebuilding trust and demonstrating our commitment to tenant safety. Appendix B: Proposed Letter to Tenants.

- 7.2 We are adopting a test-and-learn approach to our resident engagement efforts. This method allows us to pilot new engagement strategies on a smaller scale, evaluate their effectiveness, and refine them based on resident feedback before broader implementation. By experimenting with different formats, communication channels, and outreach techniques, we aim to identify the most effective ways to involve and empower residents. This iterative process not only helps us to continuously improve our engagement efforts but also ensures that we are responsive to the diverse needs and preferences of our community. Through this approach, we can adapt quickly to what works best, ensuring that our initiatives are both impactful and inclusive.
- 7.3 We have already started this work focusing on residents in Large Panel System (LPS) blocks. Actions taken to date include regular newsletters, tenancy visits, and drop-in sessions to keep residents informed and involved, as well as safety enhancements. Our plans include developing resident safety champions, expanding digital communication channels, and offering comprehensive engagement opportunities, such as focus groups and open days. Learning from our LPS block work will inform future ways of working with tenants.
- 7.4 Elected members, including ward councillors, will play a crucial role by actively participating in these engagement activities, ensuring residents' concerns are addressed at all levels of decision-making and supporting a strong, collective resident voice. The goal is to foster a collaborative environment where residents feel heard and supported, ensuring both building safety and positive long-term outcomes.
- 7.5 Alongside this, we are developing plans to reach a more diverse tenant population in order that our engagement better reflects the communities we serve, such as, young people, minority communities and marginalised groups. This includes digital surveys, neighbourhood-level outreach, project-based initiatives and tenant skill development. These changes are designed to foster greater tenant involvement in improving housing services.

## **8. Financial Implications**

- 8.1 The 2024/25 HRA budget includes a revenue budget of £2.689m and capital budget of £14.714m specifically relating to the Health & Safety works. Performance against those budget provisions continues to be monitored, it is forecast that there will be an overspend against them currently. The HRA has to remain in balance and as such mitigations are being drawn up to bring budgets back into balance by the end of the financial year. The councils Targeted Budget Monitoring report for month 5 will include the details of the latest HRA's financial position.
- 8.2 The changing nature of compliance in respect of the Building Safety Act, Fire Safety Regulations and Social Housing Regulation Act means as such that there are continually areas of investment that are being identified and need to be addressed. As additional resources are identified a Value for Money assessment will be undertaken as far as ensuring that all avenues to manage

the increase in resources within the current budget envelope are explored before final approval.

- 8.3 The response to the RSH findings will require resourcing across the medium term as well as the immediate response this financial year. The 2024/25 HRA budget paper prudently included c.£50m investment provision across capital and revenue relating specifically to the Health & Safety compliance response. This will be kept under review to ensure its reasonableness, with the 2025/26 budget paper providing an update accordingly based on engagement with the Housing service.

Officer consulted: Craig Garoghan Principal Accountant      Date: 30/08/2024

## **9. Legal Implications:**

- 9.1 The Social Housing Regulation Act, came into effect from 1 April 2024 and requires social landlords to comply with the standards set by the Regulator of Social Housing (RSH).
- 9.2 Pursuant to new enhanced powers and a more interventionist regulatory regime which came into force in April 2024, on 9 August 2024 the Regulator of Social Housing issued a regulatory judgment that there are serious failings in the Council as landlord delivering the outcomes of the consumer standards and significant improvement is needed specifically in relation to outcomes for the national Safety and Quality Standard. The full regulatory judgment provides the scope of the Regulator's findings and is referred to in the report.
- 9.3 Under the Safety and Quality Standards set by the Regulator it is a requirement that the Council has an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenant. Landlords are required by the Regulator to identify and meet all legal requirements that relate to the health and safety of tenants in their homes and communal areas, and to ensure that all required actions arising from legally required health and safety assessments are carried out within appropriate timescales.
- 9.4 Based on their assessment the Regulator has issued a C3 grade for Brighton and Hove CC. Under published guidance a C3 grade means that "there are serious failings in the landlord delivering the outcomes of the consumer standards, which the landlord's current arrangements are not strong enough to put right." In some instances, such as fire safety there is an interface with other regulatory bodies with potential enforcement powers being East Sussex Fire and Rescue Service, the Building Safety Regulator and the Health and Safety Executive.
- 9.5 In relation to failings to conduct routine repairs on appropriate timescales this also brings a risk of litigation by way of housing disrepair claims against the Council. Where there are issues which relate to damp and mould the Council should also be mindful that it is anticipated that the new government will bring



into force Awaab's law within the next year, which will require landlords to comply with new requirements to be set out in regulations, with the potential risk of complaints to the Housing Ombudsman Service which will have strengthened powers, and/or litigation in which courts have powers to order repairs and compensation if the issue cannot be resolved on sufficient timescales.

- 9.6 It is therefore essential on multiple regulatory fronts for the Council to fulfil its commitment as a corporate priority to meet all requirements and standards relating to the provision of housing. This includes the ongoing commitment of legal services at a senior level to provide detailed advice and oversight in the corporate programmes and boards driving currently improvements.
- 9.7 The Regulator expects the Council as landlord to develop a plan that will drive significant change and to share that with tenants. The Regulator's engagement with the landlord will be intensive and require evidence that sufficient change and improvement is being made. The Regulator has very substantial powers of enforcement available but is not proposing to use enforcement powers at this stage, provided Brighton and Hove CC continues to seek to resolve these issues. The report recommends further oversight of planning and progress towards achieving compliance.

Natasha Watson

Date: 5.9.24

## **10. Equality Implications**

- 10.1 We are focused on understanding and meeting the needs of vulnerable and marginalised groups, such as older adults, people with disabilities, and minority communities. The Council will continue to apply an equity-focused approach to all housing compliance and safety initiatives, ensuring that no group is disproportionately affected by past shortcomings or future actions.

## **11. Sustainability Implications**

- 11.1 Enhancing safety and compliance measures presents an opportunity to incorporate sustainable practices, such as improved insulation and energy-efficient heating systems. These initiatives will not only improve the safety and comfort of residents but also advance the Council's commitment to reducing carbon emissions and promoting environmental responsibility within the community.

## **12. Health and Wellbeing Implications**

- 12.1 The quality and safety of housing is closely tied to the health and wellbeing of our residents. By focusing on areas such as fire safety, electrical compliance, the Council aims to create safer, healthier living environments. These efforts will also help reduce health inequalities, especially for those dealing with issues like fuel poverty or chronic health conditions.

## **13. Procurement Implications**

- 13.1 Recent and planned procurement activities, including contracts for fire safety, building repairs, damp and condensation works, and lift maintenance, are key to the swift and effective implementation of the Building Safety Recovery Programme. All procurement will be carried out with consideration for sustainability, social value, and the long-term needs of residents.

## **14. Crime & Disorder Implications**

- 14.1 Well-maintained and secure housing plays a vital role in reducing crime and disorder. By addressing the safety and compliance issues highlighted in this report, the Council will enhance the living environment for all residents.
- 14.2 Additionally, the Council will continue to work closely with local police, community safety teams, and other partners to meet the broader Consumer Standards, particularly in relation to anti-social behaviour (ASB) and domestic violence (DV). By integrating these priorities into our housing services, the Council aims to foster safer, more supportive communities where all residents feel secure and protected.

## **15. Conclusion**

- 15.1 This report underscores the seriousness of the Regulator's judgement and our commitment to addressing the issues raised. While significant progress has been made, particularly in fire safety, smoke detection and electrical testing, we acknowledge that more work remains. We are taking decisive actions to ensure full compliance.

## **16. Appendices**

- **Appendix A:** The Regulator of Social Housing's Judgement on Brighton & Hove City Council [Brighton and Hove City Council \(00ML\) Regulatory Judgement: 9 August 2024 - GOV.UK \(www.gov.uk\)](#)
- **Appendix B:** Proposed Letter to tenants

### **Background documents**

- **Cabinet, 27 June 2024.** Agenda item 15. Housing, Health & Safety Update & Procurement Report: [Health Safety Update and Housing Revenue Account Repairs and Maintenance Procurement.pdf \(brighton-hove.gov.uk\)](#)
- **Housing & New Homes Committee, 13 March 2024.** Agenda item 65. Housing, Health & Safety Update Report: [Housing Health Safety Update Report.pdf \(brighton-hove.gov.uk\)](#)
- **Housing & New Homes Committee, 24 January 2024.** Agenda Item 51. Housing, Health & Safety Update Report: [Housing Health Safety Update.pdf \(brighton-hove.gov.uk\)](#)

- **Housing & New Homes Committee, 15 November 2023.** Agenda item 40. Building and Fire Safety Act Compliance, Procurement of Contractors: [Building and Fire Safety Act Compliance Procurement of Contractors.pdf \(brighton-hove.gov.uk\)](#)
- **Housing & New Homes Committee, 20 September 2023.** Agenda Item 24 – Housing, Health & Safety Update, Report and Action Plan.  
  
[Housing Health Safety Update Report and Action Plan.pdf \(brighton-hove.gov.uk\)](#)  
  
[Housing Health Safety Update Report and Action Plan. APX. n 1.pdf \(brighton-hove.gov.uk\)](#)  
  
[PowerPoint Presentation \(brighton-hove.gov.uk\)](#)  
  
[Consumer Standards \(brighton-hove.gov.uk\)](#)
- **Housing & New Homes Committee, 21 June 2023.** Agenda Item 10 – Housing, Health & Safety Update: [Housing Health Safety Update.pdf \(brighton-hove.gov.uk\)](#)



Date:

Phone:

Email:

## **Our commitment to improving safety standards in your home**

Dear resident,

The Regulator of Social Housing (RSH) oversees the social housing sector to ensure landlords deliver quality homes and services for current and future tenants. From 1 April 2024, the regulator began carrying out regulatory inspections of social landlords.

The regulator has carried out the first review of our performance and has judged that we are not currently meeting the levels of quality and safety expected and need to do more to improve how we look after council-owned homes. This rating is also known as 'C3'.

We have been working with the regulator and accept the findings of the review. We aim to deliver a high standard of housing and are very sorry that we have fallen below the expected standards.

We are working hard to put things right quickly and improve our arrangements for the maintenance of council-owned homes.

We are committed to being open and transparent with you about what has gone wrong, how we're putting it right and the progress we are making.

Our focus is on the key issues of concern raised in the review – electrical safety, smoke detection, water risk assessments and fire safety remedial actions, plus providing an effective, efficient and timely repairs service.

We will continue to work with East Sussex Fire & Rescue Service, the Building Safety Regulator and the Health & Safety Executive to ensure everything possible is being done to keep you and your families safe.

We are making improvements to the way we deliver the housing service, which include:

- Speeding up the electrical testing programme in your homes to ensure all wiring and installations are safe.
- Completing a programme of work to ensure that all homes have working smoke detectors.
- Planning a programme of water assessments and remedial actions in homes which have been identified as being at risk.
- Completing outstanding fire safety actions in properties with communal areas.

- Clearing the backlog of routine repair work and reducing response times for new routine repair requests. This includes the appointment of 2 new contractors to speed up the work on outstanding repairs.

Alongside, we will provide you with more opportunities to talk to us about your housing and the information contained in this letter.

This year's **Council Annual Tenant Conference is taking place on 23 October at Whitehawk Community Hub in Whitehawk Road, Brighton BN2 5DG**. We will include an update about all the work taking place.

The conference is organised by council tenants, leaseholders and housing staff and is open to anyone that lives in a council home.

It is a chance for housing staff to understand your experiences, for you to talk about your home, our services, and your priorities.

If you'd like to see a copy of the full RSH report or find out more, please visit our dedicated webpage at [www.brighton-hove.gov.uk/RSHreport](http://www.brighton-hove.gov.uk/RSHreport).

We can also send paper copies of the report. If you'd like a paper copy, please request one by calling our Housing Customer Service Team on 01273 293030.

You may also notice an increase in visits from our officers and contractors for inspections and repairs in relation to our work to put things right.

Please remember to always check for official identification before allowing entry. If you're in any way unsure, do contact us to verify their identity.

If you wish to raise a safety concern, have questions or there is anything else we can help with, please contact the Housing Customer Service Team on 01273 293030.

Yours sincerely,

Councillor Gill Williams,  
Cabinet Member for Housing & New Homes

Martin Reid,  
Interim Corporate Director, Housing

# Brighton & Hove City Council

## Cabinet

## Agenda Item 64

**Subject:** General Fund Budget Planning & Resources Update  
2025/26 to 2028/29

**Date of meeting:** 26 September 2024

**Report of:** Cabinet Member for Finance & Regeneration

**Contact Officers:** Name: Nigel Manvell, CFO  
Haley Woollard, Deputy CFO

Email: [Nigel.Manvell@brighton-hove.gov.uk](mailto:Nigel.Manvell@brighton-hove.gov.uk)  
[Haley.Woollard@brighton-hove.gov.uk](mailto:Haley.Woollard@brighton-hove.gov.uk)

**Ward(s) affected:** (All Wards)

**Key Decision:** No

### FOR GENERAL RELEASE

#### 1 PURPOSE OF REPORT AND POLICY CONTEXT:

- 1.1 This report provides a budget planning and resource update as a key part of the preparation for the 2025/26 annual budget and Council Tax setting process together with Medium Term Financial Plan projections over the next 4-year period.
- 1.2 The council's budget includes areas where funding is 'ring-fenced' and must be spent according to relevant government grant funding conditions and/or other statutory regulations. These include the funding of schools and special educational needs services through the Dedicated Schools Grant (DSG), Housing Benefits, Public Health services, and council housing (Housing Revenue Account) funded primarily by tenants' rents. All other unringfenced funding is used to provide the majority of council services for the city and is provided for in the 'General Fund' Revenue Budget.
- 1.3 However, the council aims to align all spending, ringfenced and unringfenced, to support the achievement of Council Plan outcomes and priorities. The General Fund budget in particular is an expression of the Council Plan in financial terms and aims to ensure that revenue and capital budgets and investment plans are aligned to achieving the outcomes of the Council Plan for a 'better Brighton and Hove for all', the four main pillars of which are to achieve:

**A city to be proud of**

**A fair and inclusive city**

**A healthy city where people thrive**

**A responsive council with well-run services**

- 1.4 This is not without its financial challenges and the report indicates that, at this stage, there is an estimated budget shortfall of over £36 million to be addressed in 2025/26 and over £105 million over the 4-year Medium Term Financial Plan period. In particular, addressing cost of living pressures is currently placing additional demands on council services and welfare support resources and therefore the government's announcement of the extension of the Household Support Fund is a welcome step to help manage demands.
- 1.5 The budget setting process will therefore be focused on the twin objectives of addressing budget shortfalls while aiming to prudently invest in sustainable change and transformation for the future. This process has started with a far-reaching Organisational Redesign aimed at not only streamlining senior management but realigning the organisation to ensure that all areas of the council can work together to achieve the Council Plan outcomes for the city.
- 1.6 The budget setting process is made up of four primary components as follows:
  - **The Medium Term Financial Plan (MTFP)** – this provides high-level spending and funding estimates and proposals over a 4-year planning period at a strategic or programme level;
  - **The Annual Budget and Council Tax** – it is a legal requirement to set a balanced budget and Council Tax each year, funded by taxation, government grants, retained business rates and fees, charges and commercial rents;
  - **The Capital Investment Programme** – this is a rolling 5-year investment programme for the construction, acquisition or improvement of capital assets in support of Council Plan priorities, primarily funded by capital grants, capital receipts, or borrowing;
  - **The Transformation Fund** – a fund that utilises capital receipts from the disposal of capital assets to fund *one-off* revenue costs to support change and transformation. Using capital receipt proceeds to fund revenue costs (e.g. staffing) is not normally allowable but the government have provided 'capital receipt flexibilities' until 2030 provided the use of any capital receipts underpins efficiencies and future revenue savings.

Each of these components is addressed in the report.

## 2 RECOMMENDATIONS:

The Cabinet is recommended to:

- 2.1 Note the planning assumption of a Council Tax increase of 2.99% over the 4-year Medium-Term Financial Plan period and an Adult Social Care Precept of 2.00% or the equivalent in grant funding in 2025/26.
- 2.2 Note the funding assumptions and net expenditure projections for 2025/26 including a projected budget shortfall of £36.730 million.
- 2.3 Note the Medium Term financial projections for 2025/26 to 2028/29 and the predicted budget gaps totalling over £105 million over the period.
- 2.4 Note the proposed budget development approach and that members will use this to develop 4-year medium-term service and financial plans and proposals for Budget Council consideration, including detailed budget proposals to set a legally balanced budget in 2025/26 and enable the Council Tax for the year to be set.
- 2.5 Note the planning assumption of recurrently funding transformation enabling resources of at least £1 million, as set out in paragraphs 7.5 to 7.6, from the



revenue budget rather than the previous practice of utilising capital receipts since 2016/17.

- 2.6 Note that projections for next year and the Medium Term Financial Plan (MTFP) will be updated following government funding announcements expected in Autumn 2024 and Spring 2025.

### **3 BUDGET SETTING AND MEDIUM TERM FINANCIAL PLANNING**

#### **Local Financial Planning Context**

- 3.1 As legally required, the budget setting process will include the development of proposals to achieve a balanced budget in 2025/26 and will set out high-level plans to achieve financial sustainability over the 4-year Medium Term Financial Plan period. This will be important for a number of reasons including:
- Addressing the External Auditor's concerns, having assessed the council's financial sustainability as a 'significant weakness', by demonstrating that the council is setting its annual budget and Council Tax in the context of understanding its longer term financial sustainability;
  - Demonstrating that any use of reserves or balances in the short-term to support the budget is financially sustainable (i.e. repayable) in the medium term;
  - Ensuring that the delivery of Council Plan priorities and associated service planning is aligned with and reflected in medium-term financial planning, and;
  - Ensuring that any budget shortfalls (gaps) in future years are identified early to enable longer term programmes of change and transformation to be instigated as soon as possible to generate the necessary savings, efficiencies or income.
- 3.2 The budget setting process will clearly need to track emerging policy decisions and announcements from the newly elected government, particularly where these could have financial implications for local government. The government has announced that it will be moving toward multi-year settlements, which is long overdue and will greatly assist development of a more robust Medium Term Financial Planning process. However, initially, a further one-year announcement is expected as part of the Autumn Statement expected to be provided on 30 October 2024 with the government is aiming to provide multi-year information by Spring 2025.
- 3.3 A number of key announcements have already been made including the decision not to implement the current version of social care funding reforms, which had been a major concern for local government. While not resolving social care funding it does remove what was expected to be a substantial additional unfunded financial pressure on local authorities in future years. A fundamental reform of Council Tax has been discounted by the new government, but details of council tax flexibilities and any allowable increases are not expected to be announced until the Autumn Statement.
- 3.4 In almost any scenario, local government will continue to face very significant financial challenges and will need to look to support from central government in the form of additional funding and/or additional financial flexibilities, particularly in respect of local taxation. The Local Government Association's (LGA) White Paper reported a projected national funding gap of £2.3bn in 2025/26, growing to £3.9bn in 2026/27 for the sector.

- 3.5 As before, developing estimates and budget proposals in an uncertain funding environment presents its own challenges and whilst preparing for a worst case scenario would go beyond prudence, the council must be cautious in its optimism and work within reasonable scenarios. For 2025/26 the working assumption at present is for a 5% Council Tax increase (including a 2% Adult Social Care precept or equivalent grant funding) subject to full Council approval. Assumptions around pay and prices are linked primarily to Office of Budget Regulation (OBR) inflation forecasts but local market factors are also taken into account, particularly for procured social care and temporary accommodation provision.
- 3.6 It is necessary to make these assumptions now to determine any potential financial shortfall next year and beyond as budget proposals and savings plans can take a significant amount of time and effort to develop, test and implement. The work on these needs to start now in order to have plans ready to consult and implement in time for next financial year and over the 4-year medium-term financial period.
- 3.7 The report therefore also includes an indicative assessment of the financial pressures facing priority services in terms of increases in costs and demographic growth in demands, particularly in relation to 'demand-led' services for vulnerable adults, families and children such as social care and homelessness support. When combined with the previous government's grant reductions and restrictions on the allowable level of council tax increases, these demand-led cost pressures have been the main driver of the substantial 'budget gaps' that the council has been experiencing for over a decade. In summary, the system of local government finance has failed to keep up with growing demands and costs.
- 3.8 The council's budget setting and medium term financial planning process will explore all options for addressing these pressures and the associated budget shortfalls as set out in the report.

### **Financial Resilience**

- 3.9 In their annual reviews, external auditors are increasingly concerned with local authorities' arrangements for securing value for money which includes demonstrating financial resilience and sustainability and providing evidence of effective medium term planning. The external auditor's Annual Reports since 2021-22 have identified financial sustainability as a 'significant weakness' for this authority and they have made Key Recommendations to the council to take steps to improve its position, in particular, to develop medium term financial plans to address sustainability. The impact of very high inflation over the past two years together with one-year Local Government Financial Settlements (for the past 6 years) has made this very difficult to put in place effectively.
- 3.10 A key indicator of financial resilience is the level of available reserves and balances held by an authority to manage unexpected financial impacts. This excludes balances held by the Housing Revenue Account and Schools which are not available to the General Fund. It also excludes capital reserves which cannot normally be used for revenue purposes. Levels are currently as follows:
- **Working Balance £6.7m** – this is a permanent risk reserve held to manage financial shocks and therefore any use must be accompanied by a plan for replenishment. Approximately £3.3m was drawn down to manage the 2022/23 outturn overspend which will be repaid at a rate of £1.125m for 3 years, starting in 2024/25, to restore the Working Balance to the recommended level of £9.0m, which represents approximately 4% of the net General Fund budget.

Holding working balances of between 4% and 5% is considered to be standard practice for local authorities.

- **Earmarked Reserves £31m** – earmarked reserves are held in lieu of an approved scheme or expense, or an identified liability, and will usually span more than one financial year. Many are held against contractual commitments (e.g. PFI contracts) while others are held for regeneration projects. Some longer-term earmarked reserves can be ‘internally borrowed’ from provided they are replenished in time for when they are required to meet their intended purpose.

- 3.11 Using the Working Balance or Earmarked Reserves to defer decisions or to balance the revenue budget is not sustainable and therefore should be an exceptional practice only, particularly as reserves are generally reducing year-on-year and the authority has not been in a position to improve its overall reserve position for many years. A full list of the council’s reserves and balances as at 31 March 2024 is provided at Appendix 9 of the Targeted Budget Management (TBM) Provisional Outturn report to the 27 June meeting of the Cabinet.
- 3.12 Financial resilience is also concerned with the sensitivity of assumptions and estimates. Previous budget rounds have looked at worst, midpoint and best case estimates for both cost increases (inflation), demographic changes (demand) and funding (government grant and taxation). However, this is a highly theoretical approach and a better approach is to identify the potential range of sensitivities for key areas of the budget. For example, what would be the impact of a Local Government pay award that is 1% higher than assumed in the estimates and what could the council do to mitigate such a risk. These sensitivities are set out in Appendix 3 which considers various potential risks inherent in the budget and how these would normally need to be treated or mitigated.

#### **4-Year Medium Term Financial Planning**

- 3.13 The difference between the estimated cost of services, net of any fees, charges and commercial rents, and the estimated resources available from taxation and government grant funding determines whether or not there will be a predicted budget shortfall/gap each year. In common with many councils, this council has experienced more significant annual budget gaps since 2010/11 as the demand for services has substantially increased while government grant funding was substantially reduced under the previous government’s ‘deficit reduction’ policies. While there has been limited redress in the last few years in terms of increased social care funding or allowable Adult Social Care Council Tax precepts, the resulting loss of funding is approximately £109 million in real terms from 2010/11 to 2024/25.

#### ***Addressing Projected Budget Shortfalls***

- 3.14 There are a number of ways that budget shortfalls can be addressed of which some are within the authority’s control but many are not. In particular, it will be important to understand the new government’s approach to Council Tax increases and discounts and whether or not restrictions on the level of increases will continue to apply. The council’s budget process will explore all options to address budget shortfalls which, together with funding announcements, include the following:
- Working now to mitigate cost and demand pressures in-year, particularly across demand-led areas such as social care, to bring down the forecast *trend* and reduce the projected budget shortfall next year and beyond;

- Similarly, consulting on and implementing savings in the current financial year, where these are supported by members, to provide more headroom and reduce the budget shortfall next year;
  - An Autumn Statement that signals an improved local government finance settlement (i.e. increased grant funding) and/or the option to increase local taxation (beyond the 5% assumed) or alter discounts, provided these are supported by full Council;
  - Working with key partners such as the NHS to jointly address funding and demand challenges;
  - Reviewing the Capital Programme to reduce associated revenue commitments (capital financing repayments);
  - Reviewing taxbases (Council Tax and Business Rates) to ensure expected taxbase growth is properly accounted for;
  - Reduction, cessation or closure of non-priority services;
  - Developing savings proposals including cost/demand reduction measures, efficiency and productivity savings, digital and technological efficiencies, commissioning and procurement savings, delivery model (insourcing or outsourcing) savings, and income generation.
- 3.15 The latter will be key to addressing budget shortfalls next year and over the medium term financial plan period. Cabinet Members will work with officers to develop proposals over the Autumn in the lead up to consideration of the full budget package in February 2025. Proposals should be multi-year to enable the council to 'financially smooth' out budget gaps over the 4-year medium term period if necessary and many will require up-front investment (invest-to-save) in order to achieve the necessary transformation and savings.
- 3.16 However, a number of pressures are continuing to increase rapidly, following years of growth, and are a key driver of the severe financial challenges facing the council. This includes Adult Social Care where continued year-on-year growth in cost and demand on the current trajectory is unsustainable and will need significant intervention and demand management to ensure costs do not financially destabilise the authority.
- 3.17 The graphic below summaries the elements that need to be considered to provide an effective budget planning approach. A key aspect of the approach is to improve the alignment of capital, revenue and transformation funding and financing to ensure that these support both financial sustainability and Council Plan priorities as far as possible. Each of the elements is described in more detail in Appendix 2.

## Components of the Medium Term Financial Planning Process



- 3.18 These processes are in addition to the basic requirement for all services, Directorate Management Teams (DMTs) and the Corporate Leadership Team (CLT) to explore all potential options for generating savings and efficiencies within their directorates, including on a cross-cutting, council-wide basis.

## 4 RESOURCES UPDATES AND ASSUMPTIONS

### Local Government Financial Settlement (LGFS)

- 4.1 The government will publish an Autumn Statement on 30 October 2024. In addition, the Office for Budget Responsibility (OBR) will release their latest outlook for the economy and public finances which should provide some high-level indication of overall funding across government departments for the remainder of 2024/25 and for 2025/26 and beyond. The government has committed to a multi-year Spending review to conclude in Spring 2025 covering the next 3 years although it is unknown whether this will translate to 3-year settlements for local authorities. The government has also committed to spending reviews every 2 years that provide a minimum 3-year horizon.
- 4.2 The provisional LGFS for 2025/26 would normally be expected in December, including confirmation of the any restrictions on council tax increases, including increases above which a local referendum may be required.

### Government Grants and Precepts

#### Revenue Support Grant (RSG)

- 4.3 For 2025/26 RSG is assumed to increase by September 2024 CPI. The Office for Budget Responsibility (OBR) is currently (Mar 2024) projecting 1.64% by the end of quarter 3, 2024 and therefore the assumed RSG will be £8.592m, an increase of £0.139m. For 2024/25, the increase in RSG was funded by reducing the

Services Grant and this is assumed to continue in 2025/26 and therefore there is no net increase in resources.

### **Services Grant**

- 4.4 Services Grant is an unringfenced grant provided by government. The Council received £0.376m in 2024/25 (down from £2.392m in 2023/24) and it is forecast to receive £0.160m for 2025/26.

### **Adult Social Care precepts and Better Care Funding (BCF)**

- 4.5 In recent years the government has provided additional resources to support Adult Social Care (ASC) through a combination of increased grant and ASC precepts. The government has stated it will not be implementing the charging reforms set out by the previous government that had been deferred to October 2025. No other announcements have been made for future years. The planning assumption is that the government will recognise the continuing pressure on the cost of these services by providing the equivalent of 2% ASC precept, either through a precept or through additional grant. This equates to £3.756m.
- 4.6 The table below summarises the overall funding assumption:

<b>Social Care Resources</b>	<b>2022/23</b>	<b>2023/24</b>	<b>2024/25</b>	<b>2025/26</b>
ASC Precept	1%	2%	2%	0%*
Improved BCF	£9.459m	£9.459m	£9.459m	£9.459m
Social Care Grant	£10.815m	£17.856m	£23.535m	£23.535m
ASC Discharge Grant		£1.326m	£2.210m	£2.210m
ASC Market Sustainability and Improvement Fund and Workforce Fund		£4.746m	£5.375m	£5.375m
Assumed additional funding				£3.756m*

\* Funding assumed to be either grant or Precept (equivalent to 2%)

### **New Homes Bonus (NHB)**

- 4.7 The government further extended the NHB scheme for 2024/25 for the 5<sup>th</sup> year without reform and the council received a one-off allocation of £2.627m based on the net increase in new properties in the city between October 2022 and October 2023 which was used to support the 2024/25 budget. No announcements have been made about the future of this grant and therefore no assumptions have been made on any additional one-off funding.

### **Business Rates**

- 4.8 For 2025/26 the projections are based on 0.25% growth compared to 2024/25. This reflects the completion of a number of business space developments across the city net of further anticipated impacts on the retail sector.
- 4.9 Business rates normally increase by September CPI which is forecast by OBR to be 1.64%. In recent years the government has made various policy changes to provide support for business ranging from small business rate relief extensions to Retail, hospitality and Leisure relief schemes. The financial impact of these policy changes have been fully funded by government through Section 31

Compensation grants and this is assumed to continue. Business Rate increases for later years are based on OBR forecasts.

- 4.10 Business rates were revalued with a new 2023 rating list in place from April 2023 and the government committed to a 3-year cycle of revaluations for the future. Revaluation can cause fluctuations in the level of resources retained by the council.
- 4.11 Business Rates forecasts continue to be an area of financial risk which is heightened by the unknown impacts of global financial events and the impact of current economic conditions on businesses and therefore these estimates could change significantly.

## **Council Tax**

### ***Council Tax Reduction Scheme***

- 4.12 The current Council Tax Reduction Scheme (CTR) was approved by full Council in February 2022. No changes have been made to the scheme, but the Council has approved the uplifting of earnings band thresholds in line with the changes to the National Living Wage announced by government.
- 4.13 The number of working age claimants has been risen by 4% since February 2024 however the average award has reduced, partially offsetting the overall increase in awards. The assumption in the projections is that the number of claimants and average awards will remain constant throughout 2024/25 and 2025/26 at the current overall levels. This assumption will be closely monitored throughout the year and will be updated with any changes to the scheme agreed by Council.

### ***Council Tax Estimate 2025/26***

- 4.14 The council tax increase for 2025/26 and later years of the MTFP is currently assumed at 2.99% for planning purposes. The impact of the current financial climate on council tax income remains difficult to predict but new housing developments have been assumed for 2025/26 alongside the introduction of the second homes premium resulting in a significant net increase of the tax base of 1.46%. The collection rate is assumed to remain at the 2024/25 level of 98.75% rather than reverting to the pre-pandemic level of 99%.

## **Corporate Inflation Provisions & Assumptions**

### ***Pay***

- 4.15 At present there is no agreed pay offer for 2024/25 or 2025/26 for the majority of staff. The employers' offer for 2024/25 for all NJC salaries is a £1,290 flat rate increase or 2.5%, whichever is greater, alongside the agreed pay award of 2.50% for JNC Chief Officers. This equates to a 3.8% increase overall however the 2024/25 budget included 3.0% and, if this offer is agreed, therefore creates a pressure of £1.300m when rolled forward into 2025/26.
- 4.16 The current pay award assumption for 2025/26 is 2.75% on the basis that inflation has significantly reduced during 2024/25 as predicted by the OBR and is expected to remain lower during 2025/26. Pay has been a significant financial risk over the past 3 years during a period of very high inflation. The pay award assumption is higher than predicted CPI and therefore could mitigate this risk. Each 1% increase equates to £1.600m for the General Fund budget. This is also a significant risk area for the separate Schools and Housing Revenue Account budgets.

### ***Pensions***

- 4.17 The recent triennial review of the East Sussex Pension Scheme covered the period 2023/24 to 2025/26 and confirmed the employer contribution rate of 19.80% across the 3 years. The East Sussex Pension Fund, in common with many funds across the country, is currently performing very well in terms of investment performance. If this is sustained, this should be reflected in employer contribution rates in the next triennial review, subject to other factors such as pay awards.

### ***Prices***

- 4.18 The provision for general price inflation ranges between 1.00% and 3.00% as a base position depending on the type of expenditure. The largest type of expenditure is Third Party Payments which covers the majority of non-staffing expenditure within adults and children's social care which has an assumed base position increase of 3.00%. The impact of inflation above these assumed base rates is separately identified as a 'Service Pressure' rather than applying generic increases to all service areas.

### ***Fees and Charges***

- 4.19 Fees and charges budgets for 2025/26 are assumed to increase by a standard inflation rate of 3.00%. Penalty Charge Notices (parking fines) are excluded from this increase as the levels of fines are set by government and cannot be changed independently. Temporary accommodation income is assumed to increase by 2.00% but this will ultimately be determined by government changes to the Local Housing Allowance rates.

### ***Commitments***

- 4.20 The budget projections for 2025/26 include some significant commitments including over £4.200m relating to the costs of previously approved capital investments funded by borrowing. During 2023/24 a review and rationalisation of the capital programme was undertaken to ensure approved projects are deliverable and affordable and this process will continue to inform the MTFP. The financing costs budget is net of investment income from cashflow surpluses which can fluctuate significantly through changes to the Bank of England base rate. The results of the capital programme review and revised investment income projections will be reflected in an updated financing costs budget for 2025/26.
- 4.21 Other substantial commitments include £1.000m recurrent IT&D resources to support the digital infrastructure and a further £1.000m to provide for transformation enabling resources (see later). The pay award for 2024/25 is estimated to be £1.300m above the allowance in the budget and therefore this becomes a commitment in 2025/26.
- 4.22 There is no recurrent funding for risk provisions included within the financial projections. For planning purposes, any risk provision would need to be managed by redirecting reserves in the short term.

## **5 ANNUAL BUDGET AND MEDIUM TERM FINANCIAL PLAN ESTIMATES**

- 5.1 The table below sets out the projected inflationary cost increases, demographic (demand) pressures and commitments for 2025/26. Information for 2025/26 must necessarily be more detailed as the council is required to set a legally balanced budget and set the Council Tax level for the following financial year.



**Table: Projected Budget Position 2025/26**

<b>Projected Cost and Demographic Pressures:</b>	<b>Estimate</b>
	£m
General Inflation assumptions including 2025/26 Pay Award	9.810
Budget Commitments (mainly capital financing)	5.348
Mainstream Digital and Transformation Enabling Functions	2.000
Grant reductions (New Homes Bonus/Services Grant)	2.760
Change in contribution to reserves	0.320
2024/25 pay award offer above 3.00% budget provision	1.300
Schools PFI contract commitments	0.180
Children's Social Care – provider and other cost increases	1.072
Looked after children and Care Leavers – demographic pressures	2.660
Adult Social Care – provider and other cost increases	8.176
Adult Social Care – demographic pressures	1.017
High Needs Block (SEN/SEMH) Cost and Funding Pressure	3.044
Temporary Accommodation/Rough Sleeping – cost and demand pressures	2.340
Home to School Transport – cost and demand pressures	0.513
Increased cost of public realm maintenance & cleaning	2.000
Concessionary Bus Fares - change in funding calculation	1.000
Housing Benefit Subsidy shortfall	0.300
Income pressures (due to falling demands)	3.026
All other pressures across council services	6.605
<b>Total Projected Cost and Demographic Pressures</b>	<b>53.471</b>
<b>Projected Funding and Taxation Resources:</b>	
Remove one-off Collection Fund deficits	-2.990
Additional government funding (assumption of 2.00% ASC Precept)	-3.756
Business rates growth and appeals change (+0.25%)	-0.161
Business rates change (+1.60% based on projected OBR Sept CPI)	-1.366
Revenue Support Grant increase (+1.60% based on OBR Sept CPI)	-0.139
Council Tax estimated tax base growth (+1.50%)	-2.711
Council Tax increase (2.99% assumed)	-5.618
<b>Total Assumed/Projected Increase in Funding</b>	<b>-16.741</b>
<b>Projected Budget Gap (Savings Requirement) 2025/26</b>	<b>36.730</b>

- 5.2 The estimates and assumptions above, based on the best information available, indicate that a substantial budget gap of £36.730m would need to be addressed in order to balance the budget. However, it must be remembered that all estimates at this stage of the process are subject to change and will be reviewed and updated throughout the budget process.
- 5.3 For planning purposes, and recognising that it will take some months to develop robust saving and transformation proposals having undertaken all of the processes outlined in paragraph 3.16 above, CLT and DMTs will work on the basis of addressing the £36.730m shortfall identified above. This will also include focusing on managing costs and demands in the current year which can

contribute to improving trends together with working up savings, cost reduction and demand management proposals for next year and the following 3 years.

- 5.4 Excluding capital financing commitments the budget gap almost exactly correlates to cost and demand pressures from services (£31.933m). Therefore, finding ways to manage or mitigate these pressures is key to resolving the council's budget challenges next year and over the medium term.

#### **Medium Term Financial Projections 2025/26 to 2028/29**

- 5.5 The table below summarises the medium term estimates and predicted budget gaps for the next 4 years based on the following key assumptions:

- Demographic pressures are based on current trends for 2025/26 and then moderated estimates for 2026/27 onward;
- 2.99% Council Tax increases over the 4-year period;
- 2.00% Adult Social Care precept for 2025/26, reverting to 0% thereafter;
- (Average) Pay award of 2.75% in 2025/26 and then 2.5% thereafter;
- 3% annual income target/generation uplifts over the period (except 2.5% in 2028/29);
- Average 3.0% social care third party provider payment increases for 2025/26 reducing to 2.5% thereafter;
- Variable 1.00% to 3.00% cash limits on non-pay budgets over the 4-year period;
- Business Rate uplifts to follow OBR September CPI inflation forecasts;
- Council Tax taxbase growth of 1.50% (including Second Homes premium) in 2025/26, 0.75% in 2026/27 and 2027/28, and 0.50% in 2028/29.

**Table: Indicative Medium Term Financial Projections**

<b>Summary Projections and Budget Gaps</b>	<b>2025/26</b>	<b>2026/27</b>	<b>2027/28</b>	<b>2028/29</b>
	£m	£m	£m	£m
Commitments (incl. previous decisions)	7.972	2.053	(0.970)	1.195
Net Inflation (on Pay, Prices, Income, Pensions)	9.810	8.548	8.732	9.551
<b>Subtotal</b>	<b>17.782</b>	<b>10.601</b>	<b>7.762</b>	<b>10.746</b>
Net Investment in priority/demand-led services	31.933	22.577	23.356	22.205
Projected Net Tax Base changes	(12.985)	(9.250)	(9.575)	(9.704)
<b>Predicted Budget Gaps</b>	<b>36.730</b>	<b>23.928</b>	<b>21.543</b>	<b>23.247</b>

- 5.6 The medium term projections could be affected by a wide range of factors as follows:

- Higher or lower demands and cost pressures than projected;
- Higher or lower tax base movements;
- Further movements in locally or nationally negotiated pay;
- Higher or lower inflation than assumed;
- More or less favourable government grant settlements;

- Potential changes to the 'excessive council tax' capping rules and/or precepting or other more fundamental changes to local government funding;
- Changes in interest rates (impacting on capital financing budgets); and
- Actuarial changes to employers' LG pension scheme contributions.

Many of these can have significant impacts on medium term projections in either direction. However, it is important to attempt to estimate future costs and resources as this gives early indications of potential future financial challenges and can inform decision-making now, particularly with regard to setting in train longer term transformation programmes to address financial sustainability.

- 5.7 Based on the analysis above, options to address budget gaps totalling £105.448m over the medium term period 2025/26 to 2028/29 will need to be developed.

#### **One-off Resource Requirements 2025/26**

- 5.8 One-off resources may be needed in 2025/26 for a wide range of reasons which could present additional financial challenges as these would require identification of resources to meet any commitments. One-off resources may be required to cover the following:

- Any Collection Fund deficits (TBM Month 4 monitoring indicates a £3.139m net deficit) \*;
- Any General Fund outturn overspend (i.e. TBM overspend) \*;
- Any increase to provisions or reserves required \*;
- Any unavoidable/unexpected one-off expenditure or commitments;
- Any one-off allocations for priorities (subject to availability of resources).

\* *The reverse is also true whereby surpluses or underspends could increase the availability of one-off resources or, at least, reduce the call on one-off resources.*

## **6 CAPITAL STRATEGY AND CAPITAL INVESTMENT PROGRAMME**

### **5 Year Capital Investment Programme**

- 6.1 The current Capital Strategy was approved by Budget Council in February 2024 along with scheme-by-scheme capital programme estimates that were incorporated into the council's Budget Book. The aim of the Capital Strategy is to ensure that all members can understand and determine the overall long-term policy objectives for the use and deployment of capital resources including borrowing. The capital expenditure estimates incorporate planned rolling investment programmes alongside major infrastructure, housing and sustainability schemes.
- 6.2 The majority of the council's capital investment is within longer-term programmes that support Council Plan priorities alongside significant capital projects. The key programmes and projects, aligned to priorities, are as follows:

#### **Homes for Everyone:**

- New Homes for Neighbourhoods and Home Purchase Scheme;
- Investment in new build housing through the Housing Revenue Account and Housing Joint Venture (with Hyde Housing);

- Investment in maintaining and improving the Council Housing Stock and building safety through the Housing Revenue Account;
- The Strategic Investment Fund (SIF) to provide project support for major regeneration programmes that draw in substantial private sector investment.

#### **A Healthy City where People Thrive:**

- Investment in a new leisure centre at the King Alfred site;
- Investment in the Hove Beach Park supported by Levelling-Up funding;
- The Education Capital programme, which provides investment from central government including New Pupil Places, Education Capital Maintenance and Devolved Formula Capital for schools;
- Disabled Facilities Grant funded adaptations to support independence at home.

#### **A City to be Proud of:**

- Renovation and restoration of the Madeira Terraces;
- Development of the Black Rock site and Valley Gardens Phase III;
- Investment in the Royal Pavilion Estate supported by the Heritage Lottery;
- The Local Transport Plan (LTP) covering a wide range of transport-related schemes;
- Significant investment in coast protection programmes;
- The Carbon Neutral investment programme.

#### **A Responsive Council with Well-run Services:**

- The Information Technology & Digital Investment Fund to maintain and upgrade the council's infrastructure and IT architecture;
- The Asset Management Fund (AMF) to maintain operational buildings, improve sustainability and reduce long term maintenance costs;
- Corporate Planned Maintenance (PMB) to undertake planned building works and upgrades;
- Vehicle and plant annual replacement programmes.

#### **Capital Receipts**

- 6.3 Capital receipts from the sale of surplus land and buildings support the capital programme and invest-to-save transformation programmes. The projections are regularly reviewed having considered the social value implications of any decision to dispose first. The council's former strategy was to re-balance the property portfolio by disposing of low or non-performing commercial properties and reinvesting in more viable property investments. However, this is now considerably more challenging as borrowing from the Public Works Loan Board is now prohibited for commercial property investment and so the current focus is on investment in existing assets through the Commercial Asset Investment Fund (CAIF) supported by capital receipts.
- 6.4 Capital receipts are under severe pressure due to competing demands for the resources and the certainty and speed with which capital receipts can be realised. This puts in jeopardy the council's ability to support the following objectives:
- Funding of annual investment funds such as the Strategic Investment Fund (SIF) and Asset Management Fund (AMF) referred to above;

- Investment to maintain the commercial property portfolio (CAIF);
- Support for accelerating housing supply schemes; and
- Funding of a Transformation Fund to support implementation of invest-to-save efficiency programmes, including digital and AI investment, over the Medium Term Financial Plan period (see below).

6.5 A recent exercise to compare projected demands on capital receipts together with known or planned disposals has been undertaken, indicating a significant shortfall of circa £17 million that will require significant further disposals to be identified as follows:

<b>Capital Strategy &amp; Capital Receipts</b>	<b>Year 1</b>	<b>Year 2</b>	<b>Year 3</b>	<b>Year 4</b>	<b>Year 5</b>
	<b>2024/25 £'000</b>	<b>2025/26 £'000</b>	<b>2026/27 £'000</b>	<b>2027/28 £'000</b>	<b>2028/29 £'000</b>
Brought forward balance	77	(3,983)	(511)	(4,389)	(10,884)
<b>Expected Capital Receipts</b>	<b>15,277</b>	<b>11,639</b>	<b>2,844</b>	<b>30</b>	<b>20</b>
Capital Receipt commitments	(19,337)	(8,167)	(6,722)	(6,525)	(6,500)
<b>Carry forward balance (deficit)</b>	<b>(3,983)</b>	<b>(511)</b>	<b>(4,389)</b>	<b>(10,884)</b>	<b>(17,364)</b>

6.6 Capital Receipt commitments include existing and approved capital schemes together with an assumed minimum investment in the Transformation Fund of £16 million (see below).

### **Review of the Existing Capital Programme and Future Requirements**

- 6.7 The Capital programme, agreed at Budget Council in February 2024 included £211.470m investment plans for 2024/25. This included a large number of schemes reprofiled from 2023/24 and in some cases previous years. Further slippage and reprofiling is expected throughout 2024/25.
- 6.8 As noted in paragraph 3.16 above, a key part of the budget process and in-year budget management will be a review of the capital programme and its affordability and deliverability. This should include further recommendations for rationalising and prioritising schemes, including de-commitment, to ensure approved projects are deliverable and affordable and to continue to strengthen alignment of capital investment to Council Plan priorities. The review will be performed alongside identifying and developing any new investment proposals to support Council Plan priorities or contribute to the council's medium and longer-term financial sustainability.

## **7 TRANSFORMATION FUND (INVEST-TO-SAVE)**

- 7.1 Previous governments have recognised that in order to make significant changes to services to improve value for money, customer service, efficiency and productivity, councils would need the flexibility to use receipts from the disposal of capital assets to make viable invest-to-save decisions. This is because achieving transformation and change often involves significant one-off costs that cannot be afforded from revenue and cannot normally be funded by capital receipts or borrowing, for example, redundancy costs or project and programme management staffing. The government's 'capital receipt flexibilities', now extended to 2030, allow the use of capital receipts for such purposes enabling the council to build up a Transformation Fund subject to the availability of capital receipts.

- 7.2 The Transformation Fund will be kept under review as budget plans develop and spend-to-save opportunities and investment requirements emerge in more detail over the planning period. At this stage, the indicative requirement for the Transformation Fund for 2025/26 to 2028/29 is shown in the table below. However, this is considered to be a minimum investment level based on the experience of previous 4-year invest-to-save programmes.

4-Year Indicative Transformation Fund	
Category of Investment	2025/26 to 2028/29
	£m
Invest-to-Save business cases for transformation	8.000
Digital and AI Development Resources and Skills Development	4.000
Managing Staffing Changes (exit packages)	3.850
Resources to generate Capital Receipts	0.150
<b>Total</b>	<b>16.000</b>

- 7.3 The investments are described in outline below:

- **Invest-to-Save Business Cases:** The 2025/26 and subsequent budget processes will encourage innovation and invest-to-save business cases aimed at supporting the achievement of Council Plan priorities and, importantly, contributing to the future financial sustainability of the council. Business cases will need to demonstrate a return on investment within a reasonable time period (max 5 years) but ideally within the 4-year medium term financial plan period. A minimum investment of £8 million is anticipated but the profile of this over the 4-year period is likely to be uneven and is most likely to need to be front-loaded.
- **Digital and AI Development & Skills:** Digital and AI is a specific form of invest-to-save. The council has already invested heavily in staff, systems and technologies to provide improved digital and on-line services. However, this process does not stop and as technologies, including AI and robotics, improve and develop, the council will need to move with the technology and ensure appropriate skills are developed to make the most of any investment.
- **Managing Staffing Changes:** Transformation and change inevitably results in significant changes to services which will entail changes to the mix or level of staffing in services. This can lead to potential redundancies which the council attempts to manage through holding vacancies or redeployment as far as possible, but otherwise through voluntary severance where this meets the council's business case criteria. This can involve significant redundancy and/or pension strain costs. At least £1 million per year is expected to be required over the 4-year period supporting severance of around 25 to 30 staff each year. Alongside vacancy management and redeployment this could enable reductions of up to 100 full time equivalent posts each year.
- **Resources to generate Capital Receipts:** Generating sufficient capital receipts in good time to support both the Transformation Fund and Capital Investment Programme will require additional conveyancing and surveyor resources. Disposals are often complex and time-consuming, involving many parties, tenancies or other complications such as lease re-gearing or land and property transfer negotiations. Without additional resources, disposals will not succeed at pace and are unlikely to provide the necessary financial

resources. An estimated investment of £0.150 million for the first two years is included above.

### **Transformation Enabling Resources**

- 7.4 Ensuring that transformation and change can be delivered requires resources that can be flexibly deployed across different programmes or to ongoing long-term change programmes. Experience has shown that the need for these resources is permanent and has required funding since at least 2016/17 to deliver major changes programmes including substantial reduction of the council's Administrative Buildings through various phases of the Workstyles programme. These resources should therefore ideally be permanently funded by the General Fund revenue budget, particularly given the greater difficulty and complexity in generating future capital receipts.
- 7.5 As a working assumption, the revenue budget therefore includes recurrent funding for Transformation Enabling resources of at least £1 million p.a. based on current resourcing, but this will need to be reviewed as the budget is developed and the scale of support for change proposals is fully understood. The costs are broadly expected to cover the following:

<b>Transformation Enabling – Recurrent Annual Costs</b>	
<b>Category of Investment</b>	<b>Annual Cost</b>
	£m
Project & Programme Management Resources	0.640
Workstyles Resources (to rationalise operational buildings)	0.180
HR Management of Change Support	0.128
Leadership Development	0.052
<b>Total</b>	<b>1.000</b>

- 7.6 By assuming permanent funding, this increases the projected budget gap for 2025/26 by £1 million and therefore increases the savings requirement to balance the budget. Although challenging, this is a recommended approach rather than funding these ongoing resources from scarce capital receipts.

## **8 HOUSING REVENUE ACCOUNT (HRA) BUDGET & CAPITAL PROGRAMME**

- 8.1 This report is primarily concerned with the development of the General Fund revenue and capital budget. However, there are links to the Housing Revenue Account (Council Housing) revenue budget and capital programme which follow a separate budget setting process. Summary information is provided below.
- 8.2 The Housing Revenue Account (HRA) is a ring-fenced account which covers the management and maintenance of council owned housing stock. This must be in balance, meaning that the authority must show in its financial planning that HRA income meets expenditure and that the HRA is consequently viable.
- 8.3 The current economic and operating environment continues impact on the resources available to the HRA during 2024/25. This includes the rising cost of services and investment needs arising in relation to compliance with the Building Safety Act, Fire Safety Regulations and Social Housing Regulation Bill as well as the impact of inflation on services.

- 8.4 An emerging issue for the council is investment requirement in 8 Large Panel System (LPS) blocks across the city. Whilst investment was anticipated over a longer period of time for these blocks, there is a need to ensure the blocks remain safe in the short term with measures being introduced which require a significant revenue investment for the HRA over the short term. Longer term plans are under consideration for these blocks with required capital investment forming part of future budget papers where reasonable estimates can be made.
- 8.5 Recent Housing press has indicated that Central Government are due to announce a long-term rent policy whereby social rented landlords will be able to increase by CPI+1% for the next ten years. The 2024/25 Medium Term Financial Strategy assumed an increase of CPI only, therefore the move to a CPI+1% model will have a positive impact on HRA finances. However, at the time of drafting the MTFs for 2024/25, inflation was anticipated to be at a higher level in September 2024 than it was currently forecast to be, therefore there may be a neutral impact in the short term.
- 8.6 The capital plan for the HRA is split into two main areas in investment, this being improving the quality, safety, and energy efficiency of council homes and in new housing supply. Investment in existing stock is funded from direct revenue funding from tenants' rents (including associated rent rebates) and HRA borrowing that is supported by tenants' rents over a longer period. Whilst investment in new supply is mainly funded from retained capital receipts (including Right to Buy sales and commuted sums), grant funding and HRA borrowing.
- 8.7 The HRA capital investment programme for 2024/25 to 2028/29 is informed by the most recent stock condition review and survey as well as the existing and emerging priorities of the HRA Asset Management Strategy. Key considerations include improving the safety and quality of homes and ensuring regulatory compliance is met. This includes working in consultation with external bodies such as the Regulator of Social Housing and East Sussex Fire and Rescue Authority, as well as tenants and leaseholders to inform the planned and major works strategy. Investment also continues in carbon reduction initiatives to support the city's commitment of becoming carbon neutral by 2030.
- 8.8 The HRA continues to look at the range of initiatives it has to deliver additional housing and meet the commitment to deliver new affordable council homes. These initiatives include the New Homes for Neighbourhoods Programme, Home Purchase Scheme, Converting Spaces programmes and the Homes for the City of Brighton & Hove Joint Venture.
- 8.9 Work will continue through 2024/25 to deliver housing supply pipeline schemes. The Home Purchase Scheme will continue to explore opportunities to buy back ex-right-to-buy properties, whilst the extended Home Purchase Scheme will look at off the shelf purchase opportunities to increase the supply of affordable housing within the HRA.

## **9 SCHOOLS BUDGETS AND FUNDING**

- 9.1 The Dedicated Schools Grant (DSG) is a ring-fenced grant that provides funding for Schools, Academies, Early Years, Special Educational Needs and a small number of allowable Central items. The DSG is allocated to schools and academies on the basis of a National Funding Formula (NFF) primarily driven by pupil numbers.



- 9.2 Similarly to the HRA, the development and setting of schools' budgets follows a separate process involving statutory consultation and oversight of the Schools Forum. However, there are links with the General Fund budget setting process as General Fund budget proposals and savings can potentially impact schools and vice versa.
- 9.3 Announcements regarding the 2025/26 Dedicated School Grant (DSG) allocation would normally have taken place in July. However, this has been delayed due to the General Election and there has been no further update from the Government as to when the 2025/26 settlement will be published. Therefore, an overview of the 2024/25 allocation is provided below.
- 9.4 The Dedicated Schools Grant (DSG) is divided into four blocks – the Schools Block, the High Needs Block (HNB), the Central School Services Block (which allocates funding to local authorities for their ongoing responsibilities towards both maintained schools and academies), and the Early Years Block. Each of the four blocks of the DSG are determined by separate national funding formulae (NFF).
- 9.5 In July 2024, the Department for Education (DfE) announced the updated DSG funding settlement for the 2024/25 financial year. This is set out in the table below, together with a comparison to 2023/24.

<b>Financial Year</b>	<b>Schools Block £'000</b>	<b>Central School Services Block £'000</b>	<b>High Needs Block £'000</b>	<b>Early Years Block £'000</b>	<b>Total DSG £'000</b>
2024/25	165,039	2,074	38,849	26,434	232,396
2023/24	159,378	2,136	37,364	15,433	214,311
<b>Increase</b>	<b>5,661</b>	<b>(62)</b>	<b>1,485</b>	<b>11,001</b>	<b>18,085</b>

#### ***Schools Block – Base 2024/25 Allocations***

- 9.6 In 2023/24, schools received a separate mainstream additional grant outside of the main DSG. This equated to £5.364m. For 2024/25, this funding has been rolled into the Schools Block of the DSG meaning the total Schools Block funding is virtually unchanged between the two financial years. In overall terms, after other adjustments are considered, the total funding available to mainstream schools through core formula budget allocations between 2023/24 and 2024/25 will increase by c. £0.500m. This equates to a percentage increase in cash terms of just 0.3%, and an increase in per pupil funding of 2.0%. For presentational purposes the Schools Block figures above are inclusive of funding for non-domestic business rates and are prior to recoupment for academies funding.
- 9.7 It should be noted that the Schools Block pupil numbers have decreased from 29,451 in October 2022 to 28,972 in October 2023. This is a reduction of 479 pupils and equates to an overall loss of DSG Schools Block funding to the local authority of c. £2.45m. This presents a very challenging financial backdrop for schools.

### ***Updated School Balances Position***

- 9.8 School carry forwards at the end of 2023/24 are £0.281m, a reduction of £4.259m from the £4.540m balance at the end of 2022/23. This is a key indicator of the financial challenges being experienced across all phases.

<b>Schools Balances</b>	<b>Nursery £'000</b>	<b>Primary £'000</b>	<b>Secondary £'000</b>	<b>Special £'000</b>	<b>Total £'000</b>
Final 2022/23 balances	-81	1,185	3,573	-137	4,540
Final 2023/24 balances	24	-1,143	2,048	-648	281
<b>Movement</b>	<b>105</b>	<b>-2,328</b>	<b>-1,525</b>	<b>-511</b>	<b>-4,259</b>

### ***Final School Budget Plans and Licensed Deficits 2024/25***

- 9.9 Schools submitted their budget plans for 2024/25 during summer term 2024. The latest position shows that 34 schools require licensed deficits totalling £7.1m. This is significantly in excess of the net school surplus balances of £0.281m at the end of 2023/24 and the Chief Finance Officer has advised that a reserve will need to be identified against which this deficit can be internally borrowed.
- 9.10 In July 2024 the government announced an additional Core School Budget Grant for schools. This is in acknowledgement of the additional cost pressures facing schools in 2024/25 because of higher than anticipated pay awards. It is estimated this will provide another £3.2m of funding to maintained schools in the city whereas additional costs over and above those allowed for in budget plans are estimated at £2.8m, meaning there may be a slight improvement in the overall school budget position in 2024/25 compared to the position set out in final school budget plans.

### ***High Needs Block***

- 9.11 The headline allocation of High Needs Block funding is shown in the table above. The government increase in funding of c. £1.5m (4%) is significantly below the demand and cost pressures the council is experiencing and forecasts show a potential deficit in the 2024/25 high needs block of approximately £0.8m.
- 9.12 The council continues to seek to provide additional local specialist provision linked to the SEN Sufficiency Strategy, however, costs associated with the establishment of this are high.
- 9.13 Under current national legislation a statutory override mechanism is place which allows local authorities to keep DSG deficits separate from the General Fund budget, however this statutory override arrangement is due to expire in March 2026. The latest published data shows that approximately 100 out of 150 local authorities are operating with deficits against the high needs block of their DSG allocations.

### ***Early Years Block***

- 9.14 There are significant extensions to free entitlement in 2024/25 resulting in a large increase to Early Years Block funding. For 2024/25 the main early years entitlements are:
- the 15 hours entitlement for eligible working parents of children from nine months to two years old (new entitlement from 1 September 2024);

- the 15 hours entitlement for eligible working parents of two-year-old children (new entitlement from 1 April 2024);
- the 15 hours entitlement for disadvantaged two-year-olds;
- the universal 15 hours entitlement for all three and four-year-olds;
- the additional 15 hours entitlement for eligible working parents of three and four-year-olds.

9.15 Government funding rates are increasing for 2024/25 and there is a requirement for the local authority to pass on a minimum of 95% Early Years Block funding to providers. It is anticipated that the Early Years Block will be in breakeven position in the 2024/25 financial year.

## 10 BUDGET DEVELOPMENT TIMETABLE

10.1 The indicative timetable for developing and approving the 2025/26 budget and MTFP is given below. The timetable is in outline only and does not include all aspects of member involvement or wider consultation that will normally need to be undertaken with staff, unions, partners, service users and residents.

Table: Outline General Fund Budget Planning Timetable

Date	Who	What
Aug – Nov	CLT	Develops Medium Term service and financial plans including the workstreams set out in this report (para 3.16) and budget proposals to address budget gaps for 2025/26 to 2028/29
26 Sept 2024	Cabinet	General Fund Budget Planning & Resources Update 2025/26 to 2028/29
17 Oct 2024	Cabinet	TBM month 5 (August)
30 Oct 2024	Government	Autumn Statement announcement expected (1 year only)
Dec to Mar	CLT	The majority of consultation processes start in December and continue through to conclusion, usually no later than March. However, consultation can start earlier if appropriate/necessary.
12 Dec 2024	Cabinet	TBM month 7 (October) Council Tax Reduction Scheme Review 2025/26
December	Government	Provisional Local Government Finance Settlement 2025/26
23 Jan 2025	Cabinet	Council Tax and Business Rates Tax Base report [Legal requirement]
February 2025	Government	Final Local Government Financial Settlement 2025/26
13 Feb 2025	Cabinet	2025/26 General Fund and HRA Revenue & Capital Budget reports including the Capital and Treasury Management strategies. TBM month 9 (December).
27 Feb 2025	Budget Council	Approval of the 2025/26 General Fund and HRA Revenue & Capital Budget including the Capital and Treasury Management strategies.

## **11 ANALYSIS & CONSIDERATION OF ANY ALTERNATIVE OPTIONS**

- 11.1 The setting of the General Fund budget in February allows all parties to engage in the examination of budget proposals and put forward viable alternative budget and council tax proposals, including amendments, to Budget Council on 22 February 2025. Budget Council has the opportunity to debate the proposals put forward by the Cabinet at the same time as any viable alternative proposals.

## **12 COMMUNITY ENGAGEMENT AND CONSULTATION**

- 12.1 This report will be shared widely with key stakeholders and partners as it signals to all parties the anticipated financial challenge facing the council for next year and beyond, notwithstanding the imperfect funding information available at this stage.
- 12.2 Whilst no specific consultation has been undertaken in relation to this report, the development of the council's budget and future plans is a major undertaking and proposals can affect a wide range of services and therefore have impacts on residents, businesses, visitors and staff. Appropriate and necessary statutory consultation and engagement will need to be undertaken with residents, service users, staff, unions, partners, business representatives and the community and voluntary sector.
- 12.3 Detailed consultation and engagement plans will be put in place over coming weeks and months, well in advance of proposals coming forward in February 2025 for full Council approval. However, consultation and engagement is expected to include the following:

### **General Information**

- 12.4 General information and advice about the council's budget will continue to be provided through the council's web site which provides information and infographics on how money is spent on services, where the money comes from, the council's capital and transformation investment plans, and a summary of the financial challenges ahead. These materials will continue to be promoted through various media and communications throughout the budget setting period. Frequently asked questions and common themes have previously emerged through the development of the annual budget and have been responded to in our 'Behind the Budget' web page: [Behind the budget \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/behind-the-budget).

### **Community and Resident Engagement**

- 12.5 It is also planned to undertake a resident survey to understand residents' priorities for spending the council's budget within the challenging resource limitations experienced by local government for many years. The council is hoping to use its 'Your Voice' on-line engagement platform and a budget simulator to capture valuable information to inform members' decision-making.
- 12.6 Similarly, subject to funding and venue availability, it is hoped to provide an open access event for residents to come and hear about the budget and the challenges and restrictions facing the council in determining how the budget is spent. The event will discuss the little understood but key difference between capital expenditure and funding compared to revenue expenditure and funding which supports day-to-day services. This can help to explain how it is that with the latter being under very severe pressure, the council is still able to undertake significant and important capital investments such as replacing the King Alfred

Leisure Complex or renovating Madeira Terraces. This event will also seek to capture feedback and views from a cross-section of our city.

- 12.7 Consultation with Community & Voluntary Sector groups and representatives is also planned and appropriate meetings and venues will be provided included a facilitated event at Jubilee Library.

### **City Partners**

- 12.8 Information will also be shared with City Partners through the City Management Board and other channels. In particular, the council continues to engage fully with the NHS Sussex Integrated Care System to ensure that the budget processes of the two organisations are aligned and communicated as far as practicably possible although this presents challenges as NHS funding announcements are normally announced much later than Local Government, often close to or even after the start of the next financial year.

### **Business Engagement**

- 12.9 There is ongoing liaison and discussion with the Economic Partnership that covers potential funding sources and bids, city regeneration, economic growth, employment and apprenticeship strategies. Officers of the council and members of the Administration meet periodically with representatives of the Chamber of Commerce and B&H Economic Partnership to discuss the council's high-level plans and over-arching budget situation.

### **Schools Community**

- 12.10 The Schools Forum, a consultative body attended by representatives of all school phases, will primarily focus on the allocation of the ring-fenced Dedicated Schools Grant (DSG) funding across the relevant budget 'blocks' but will also be periodically informed about the General Fund budget position and proposed changes to council services where these may have implications for schools.

### **Third Sector Engagement**

- 12.11 A key stakeholder is the Community & Voluntary Sector, and communications and meetings with representatives of the sector will therefore be planned to provide them with an opportunity to feedback their views to the council and members as budget proposals develop.

### **Staff and Union Engagement**

- 12.12 Consultation and engagement with staff and unions is also very important. The scale of financial challenge indicates further significant impacts on the configuration and/or provision of services which will inevitably entail staffing changes. Meetings with the council's recognised unions, including appropriate officers and members of the Administration, will be scheduled regularly to keep unions abreast of developing proposals and to ensure they have sight of where support to their memberships may be required. The council's Joint Staff Consultation Forum will continue to provide a formal setting for sharing and raising matters relating to the overall budget process and development.
- 12.13 Later in the process, detailed proposals will be shared with affected staff ahead of formal publication of budget proposals through Departmental Consultative Groups (DCGs) and through line management. Formal consultation and engagement with directly affected staff will be undertaken as normal, including relevant union representation, under the council's Organisation Change Management Framework.

- 12.14 Wider staff engagement will be provided through 'In conversation' sessions with the Chief Executive and through directorate consultation and engagement event. Further updates and communications for staff will be provided via the council's intranet, corporate email broadcasts and the Chief Executive's communications.

### **Specific Consultation**

- 12.15 A number of potential services changes or delivery model changes have been identified for exploration as part of the budget process. These may have long lead-in times and therefore, if ultimately supported, consultation and engagement would need to start well in advance of next financial year. Potential areas for exploration include:
- Potential development of in-house residential provision for children with complex disabilities to explore best value for money delivery options;
  - Exploring in-sourcing of the highest cost Home-to-School Transport routes (minibuses) to provide better value for money;
  - Exploring AI technologies, including predictive analytics, to focus the right support at the right time for Children & Families and reduce administrative support costs;
  - Potential use of technology-enabled care across Adult Social Care to maintain independence;
  - Managing Adult Social Care demands at the Front Door with improved information and self-assessment options;
  - Exploring alternative delivery models for in-house Adult Social Care provision to ensure best value for money;
  - Use of tools which support Adult Social Care brokerage for achieving best market value;
  - Creation of a wholly-owned Housing Company to acquire housing and attract higher rates of welfare benefit (Local Housing Allowance);
  - Further review of the delivery model for the Schools IT&D traded service;
  - Business Support and Admin functional alignment review.

## **13 Financial Implications:**

- 13.1 These are contained in the body and appendices of the report.

Finance Officer Consulted: Haley Woollard      Date: 28/08/24

## **14 Legal Implications:**

- 14.1 The process of formulating a plan or strategy for the council's revenue and capital budgets falls within the Allocation of Responsibilities for Functions for the Cabinet under Part 2E of the constitution.
- 14.2 This report complies with the Council's process for developing the budget framework, in accordance with the Council's Budget and Policy Framework Procedure Rules as set out in Part 3D of the Constitution.

Lawyer consulted: Elizabeth Culbert      Date: 28/08/24

## **15 Equalities Implications:**

- 15.1 For any significant budget changes proposed in 2025/26, it is proposed to use the council's well-established screening process to develop Equality Impact Assessments (EIAs). Key stakeholders and groups will be engaged in developing

EIAs but it will also be important to consider how members, partners, staff and unions can be kept informed of EIA development and the screening process. In addition, where possible and proportionate to the decision being taken, there may be a need to assess the cumulative impact of the council's decision-making on individuals and groups affected in the light of funding pressures across the public and/or third sectors. The process will ensure that consideration is given to the economic impact of proposals.

## **16 Sustainability Implications**

- 16.1 The council's revenue and capital budgets will be developed with sustainability as an important consideration to ensure that, wherever possible, proposals can contribute to reducing environmental impacts and support progress toward a carbon-neutral city.

## **17 Health and Well-being Implications**

- 17.1 The council's budget includes very substantial provision for expenditure on Adult and Children's Social Care, Public Health, Housing and Homelessness, Welfare Assistance (for example the Council Tax Reduction Scheme), Education and Skills, and many other essential services that support vulnerable people and children, and households on low incomes or experiencing homelessness. These services contribute significantly to the health and well-being of thousands of residents and the wider population, upholding the council's priority to support 'A healthy city where people thrive' and engender 'A fair and inclusive city'.

## **18 Other Implications**

### **Risk and Opportunity Management Implications:**

- 18.1 There are a range of risks relating to the council's short and medium term budget strategy including the ongoing economic impact of the higher inflationary environment, the impact of the cost of living crisis, further potential reductions in grant funding, the impact of legislative changes, and/or other changes in demands. The budget process will normally include recognition of these risks and identify potential options for their mitigation. In the current financial climate, the level of risk that the council may be prepared to carry is likely to be higher than in normal circumstances. An indication of potential risks and sensitivities is given in Appendix 3 of the report.

## **19 CONCLUSION**

- 19.1 The council is under a statutory duty to set its budget and council tax before 11 March each year. This report sets out information on projected costs, investments and resources for 2025/26 to 2028/29. It also provides an outline timetable for considering options to develop the 2025/26 annual budget and address future budget shortfalls identified in the current MTFP.

## **SUPPORTING DOCUMENTATION**

### **Appendices:**

1. Updated Medium Term Financial Assumptions and Projections
2. Components of the Medium Term Financial Planning Process
3. MTFS Risks and Sensitivities





## MEDIUM TERM FINANCIAL STRATEGY TABLES

## Core Planning Assumptions

The table below sets out the core planning assumptions included in the MTFS projections:

	2024/25	2025/26	2026/27	2027/28	2028/29
<b>Pay inflation and pay related matters:</b>					
- Provision for pay award	3.00%	2.75%	2.50%	2.50%	2.50%
- Employers pension contribution rate change	0.00%	0.00%	0.00%	0.00%	0.00%
<b>General inflation:</b>					
- Inflation on social care third party payments	3.50%	3.00%	2.50%	2.50%	2.50%
- Inflation on non-pay expenditure	1.00% - 3.00%	1.00% - 3.00%	1.00% - 3.00%	1.00% - 3.00%	1.00% - 3.00%
- Inflation on waste PFI	3.50%	3.50%	3.50%	3.50%	3.50%
- Inflation on income	3.50%	3.00%	3.00%	3.00%	2.50%
- Inflation on parking income	3.50%	3.00%	3.00%	3.00%	2.50%
- Inflation on penalty charge notices	0.00%	0.00%	0.00%	0.00%	0.00%
<b>Resources:</b>					
Change to Revenue Support Grant (RSG)	6.70%	1.64%	1.63%	1.64%	2.00%
Business rates poundage inflation uplift	6.70%	1.64%	1.63%	1.64%	2.00%
Assumed council tax threshold increase	2.99%	2.99%	2.99%	2.99%	2.99%
Adult Social Care Precept	2.00%	0.00%*	0.00%	0.00%	0.00%
Council Tax Base	0.90%	1.50%**	0.75%	0.75%	0.50%

\*The assumption for additional funding for Adult social Care is the equivalent to a 2% precept in 2025/26, currently assumed to be in the form of additional grant.

\*\*Includes the introduction of Second Homes Premium which is equivalent to a 0.9% increase in the tax base

## Summary of MTFS projections

The table below sets out the savings /budget gap, taking into account the anticipated expenditure over the MTFS period and the funding resources available:

Medium Term Financial Strategy 2025 to 2029	2025/26	2026/27	2027/28	2028/29
	£m	£m	£m	£m
<b>Net Budget Requirement B/Fwd</b>	<b>246.355</b>	<b>269.489</b>	<b>278.339</b>	<b>287.503</b>
Remove net one off short term funding and expenditure	0.000	0.000	0.000	0.000
<b>Net Budget Requirement B/Fwd</b>	<b>246.355</b>	<b>269.489</b>	<b>278.339</b>	<b>287.503</b>
Standard Pay and Inflation – Expenditure	13.093	12.161	12.450	12.811
Standard Inflation - Income	(3.283)	(3.613)	(3.718)	(3.260)
Demographic and inflationary pressures in Adult Social Care including Adult Learning Disabilities	9.193	13.863	14.666	15.019
Demographic and inflationary pressures for Children’s disability, Children in Care, and Care Leavers	3.732	3.444	3.337	3.249
Temporary Accommodation and Rough Sleepers - cost and demand pressures	2.340	0.193	0.198	0.204
Home to School Transport - cost and demand pressures	0.513	0.133	0.138	0.143
Schools PFI contract commitments	0.180	0.561	0.596	0.000
Dedicated Schools Grant (DSG) - High Needs Block - review of usage	3.044	0.000	0.000	0.000
Income Pressures – falling demand	3.026	0.000	0.000	0.000
Increased cost of public realm maintenance and food waste pilot	2.000	0.000	0.000	0.000
Concessionary Bus Fares - increased burden due to change in calculation	1.000	0.000	0.000	0.000
All other pressures across council services	6.905	4.383	4.385	3.590
Mainstream Digital and Transformation Support Functions	2.000	0.000	0.000	0.000
Commitment - Reduction/loss of Services Grant/New Homes Bonus	0.133	0.160	0.000	0.000
Commitment - Change in S31 Grants	10.149	(0.400)	(0.411)	(0.486)
Commitment - Change in contributions to/from reserves	0.320	0.000	(1.125)	0.000
Commitment - Change in financing Costs	4.223	1.033	(0.195)	0.953
Commitment - Pay award 2024/25 above 3% inflation assumption	1.300	0.000	0.000	0.000
Commitment - impact of previous decisions, grant changes and assumptions	(0.004)	0.860	0.350	0.242
Budget Gap (Savings Requirement)	(36.730)	(23.982)	(21.543)	(23.247)
<b>Budget Requirement C/Fwd</b>	<b>269.489</b>	<b>278.339</b>	<b>287.503</b>	<b>296.721</b>

<b>Funded by:</b>				
Revenue Support Grant	8.592	8.732	8.875	9.051
Locally retained Business Rates	67.477	68.911	70.382	72.126
Collection Fund position	0.000	0.000	0.000	0.000
Council Tax including Adult Social Care Precept	193.420	200.696	208.246	215.544
<b>Total Funding</b>	<b>269.489</b>	<b>278.339</b>	<b>287.503</b>	<b>296.721</b>



## Components of the Medium Term Financial Planning Process



The components are described below:

### Review of Capital Programme Alignment & Affordability

- 1.1 The council's capital programme was reviewed last year to improve alignment with Council Plan priorities. A number of schemes were decommitted, resulting in reduced capital financing costs. This process needs to continue to further improve alignment, continue to assess affordability, and consider opportunities to invest in new schemes that will support the Council Plan.

### Capital Financing Review

- 1.2 Linked to the Capital Programme review above, the associated Capital Financing budget will also be reviewed. The current capital investment plans will see very substantial capital financing costs start to flow from 2025/26, in the form of Minimum Revenue Provision charges for schemes supported by borrowing. Where schemes do not support Council Plan priorities they should therefore be decommitted or reduced as far as practicable to reduce pressure on the revenue budget.

### **Development of Invest-to-Save Transformation Programmes**

- 1.3 There are many potential options that can be explored to improve longer term financial sustainability. Everything from investing in prevention to reduce longer term social care costs, to developing new income sources, to redesigning care pathways, or insourcing or outsourcing services. However, these can take significant capacity and investment to bring to fruition and therefore need to be properly assessed and evaluated before embarking on a whole host of initiatives with questionable returns on investment. They are also likely to need one-off investment through a Transformation Fund (see later).

### **Income Generation and Commercialisation Strategy**

- 1.4 Many fees & charges are regulated and in general fees & charges are set to recover costs and overheads of the service provided. However, in some areas the council has more discretion. There are still many areas where the council does not charge but could legally do so. A key concern with fees & charges is the equality impact and impacts on those with low incomes. This can be managed by designing the fee or charge to accommodate such impacts, for example, introducing means tests. Many councils have become increasingly reliant on fees & charges to protect service provision due to the limitations on Council Tax increases and reduced government grant funding. Approximately one third of the council's General Fund council services are now funded by fees & charges. Further opportunities will continue to be explored.

### **Apply Productivity or Efficiency Targets**

- 1.5 Continually improving efficiency is good business practice for any organisation. This can be achieved through continually reviewing and improving processes (i.e. service redesign), using IT, digital and AI technologies to automate workflows and on-line services, and effective procurement, contract management and commissioning strategies to utilise the council's purchasing power to shape local provision or secure more competitive terms. To recognise this, some expenditure categories, e.g. supplies and services, can be cash limited (i.e. provided with a lower or no inflationary budget uplift or even reduced) or services can be targeted with generic efficiency targets (e.g. 1% or 2% cost reduction targets) to ensure that all areas of the council strive for improved value for money. These opportunities will be a key area to explore in the forthcoming budget process.

### **Explore Fundraising Opportunities**

- 1.6 The council has been successful over many years in bidding for additional revenue and capital funding including Heritage Lottery funds, Arts Council Funds, Homelessness and Rough Sleeping (RSI) funding, Levelling Up funding, Family Hub funding, Department for Transport funding (e.g. the substantial Bus Partnership bid), Shared Prosperity Funding and so on. However, there may be other opportunities available to the council to attract funding or even to explore changing the funder of some services.
- 1.7 A key area to watch is the Household Support Fund (£2.280m for BHCC) which is due to expire on 30 September 2024 and which has provided limited but important local welfare assistance for low income households. All parties, including the LGA, are currently lobbying for its extension to avoid potentially serious impacts on council services including increased homelessness.

### **VFM Reviews**

- 1.8 The council has a Best Value duty under the LG Act 1999 requiring it to 'make arrangements to secure continuous improvement in the way in which its functions are

exercised, having regard to a combination of economy, efficiency and effectiveness.’ This is generally referred to as improving Value for Money (VFM). There are many ways to test and assure the value for money of services provided by the council including:

- Comparing the cost and quality of services with similar authorities or service providers;
- Comparing the cost of services per capita of the relevant population groups or service groups e.g. cost of Children’s Services per 1,000 children and young people aged 0 to 24 in the local authority area;
- Using external, independent peer challenge to help identify improvements e.g. LGA peer reviews;
- Utilising best practice research or commissioning new research to improve services provided by the authority;
- Engaging expert consultancy to help identify and design specific services or interventions to help improve VFM;
- Comparing the cost and quality of in-house provision versus contracted or outsourced provision (so-called ‘make or buy’ reviews).

### **Transformation Fund**

- 1.9 Transformation funding is discussed in the main report but is now becoming problematic. Funding has been supported by the government’s ‘capital receipt flexibilities’ enabling capital receipts to be used to fund revenue expenditure provided such expenditure supported improved value for money and future revenue savings. These flexibilities have been extended to March 2030, however, the demand on capital receipts across a range of objectives is such that they may not provide sufficient resources. Future invest-to-save transformation activities may therefore need to consider using a range of funding options including:

- Using capital receipt flexibilities subject to availability of capital receipts and any change to the use or extent of flexibilities introduced by the new government;
- Where a clear return on investment can be demonstrated over a reasonable time period (max 5 years), this could potentially be supported by internally borrowing from reserves with subsequent repayment (subject to availability of reserves);
- Alternatively, investment requirements can be netted off against savings proposals, meaning that the saving in the first year or more is reduced but then increases to its full extent in later years once the initial investment is repaid, or;
- If any element of the invest-to-save/transformation proposal is of a capital nature, borrowing could be considered, provided that a return on investment can be evidenced in the business case.

### **Star Chamber Review of Proposals**

- 1.10 Star Chambers are common practice across business and local authorities and are effectively a form of internal peer review. They can involve both officers and members as desired. The intention is to utilise a Star Chamber process later in the budget process when proposals are reaching a more developed state to fully test delivery risks, review the capacity required to achieve change, understand cumulative impacts on equalities and consider any cross-cutting impacts on other council services.

- 1.11 The above processes are in addition to the basic requirement for all services, Directorate Management Teams (DMTs) and the Corporate Leadership Team (CLT) to explore all potential options for generating savings and efficiencies within their directorates, including on a cross-cutting, council-wide basis.



## ASSESSMENT OF BUDGET SENSITIVITIES AND MEDIUM TERM RISKS

The Medium Term Financial Plan (MTFP) of a large public sector organisation with many demand-led services and complex, uncertain funding streams will always contain significant and varying degrees of risk. The cost of living crisis, higher inflation and higher interest rates have significantly impacted the council's expenditure and income throughout 2023/24 and continues into 2024/25. This includes higher than anticipated pay awards, higher costs of social care, impacts on fees & charges due to economic conditions, continued high levels of Council Tax Reduction claimants (i.e. taxation losses), and continued high levels of support for homelessness.

These pressures have resulted in current forecast overspends in-year requiring ongoing recruitment and spending controls to help mitigate the financial position alongside other financial recovery measures. This highlights the need to recognise the financial risks of unexpected events and the impact this has on the resilience of the authority.

The pressures experienced in recent years may continue well into the medium term given the growth in Education, Health & Care Plans (EHCPs), growing Learning Disability demands, a national obesity crisis, and subject to national and local success in tackling housing demand. The corollary is that current predictions indicate that the council will need to make substantial savings in 2025/26 and over the MTFP period.

For businesses within the city the government has provided ongoing Business Rates reliefs to help the sector, whilst for individuals, the government is providing additional funding through the Household Support Fund.

The previous government again announced a one-year settlement for 2024/25 on 18 December 2023 with no information for 2025/26 onwards. An Autumn Statement is expected on 30 October from the new government which is also expected to cover one-year only but with an indication that a multi-year Comprehensive Spending Review will follow in the Spring.

In general, other factors that can have a material effect on the medium term financial position of an authority include:

- The lack of certainty in future resource levels;
- Changes in function and/or funding;
- Changes in the economy including the impact on business rates income and/or Council Tax Reduction claimant numbers or collection rates;
- Similarly, impacts on the levels of house building which affects both Council Tax and New Homes Bonus or a successor mechanism;
- The level of future successful appeals against the business rating list;
- Changes in employer costs e.g. pension or national insurance changes;
- Achievement of performance targets for performance related grant or partnership funding;
- Delivery and achievement of savings and transformation programmes;
- Ability to manage identified demand-led service pressures;
- Decisions on council tax increases and the council tax reduction scheme;
- Democratic support for change including partnership working, integration or devolution.

Risks to the MTFP arise from both external and internal factors. External risks include, for example, government policy decisions that can have positive or negative impacts on costs

or national or local economic conditions that can affect income sources up or down. External risks are generally the most difficult to manage or plan for.

Internal risks can also arise for a number of reasons, such as cost overruns, underachievement of savings plans, changing priorities or ineffective systems of demand management. They may also be influenced by external factors. It is vital to have adequate mechanisms to manage internal risks if financial stability is to be achieved. There are a number of ways in which the effects of risks can be managed and these are set out in the following risk table. Furthermore, the council's MTFP, by taking a longer term planning approach, aims to minimise the impact of some of the major financial risks and the impact on investment in support of the council's priorities.

The forecasts within the MTFP are based on prudential assumptions that reflect the most likely position based on current knowledge and data. There are therefore risks of over or under stating expenditure or income estimates which are considered below.

The identified risks are scored for Likelihood (L) and Impact (I). The scores are multiplied to give a resulting risk score. The key to the scores is given below:

Key:

<b>Likelihood (L)</b> (of occurrence):	1 – Almost impossible 2 – Unlikely 3 – Possible 4 – Likely 5 – Almost certain
<b>Impact (I):</b>	1 – Insignificant 2 – Minor 3 – Moderate 4 – Major 5 – Catastrophic or fantastic
<b>Risk Score (L) x (I):</b> (Overall rating)	1 to 3 Low 4 to 7 Moderate 8 to 14 Significant 15 to 25 High

Risk Scores above at the midpoint of the range or higher (12 or higher) are highlighted (shaded) in the table below.

Risk	Likelihood (L)	Impact / Sensitivity (I)	Risk = (L) x (I)	Possible Impact on Financial Strategy	Mitigation / Management
<b>Potential Risks affecting 2025/26</b>					
Council Tax base is lower than anticipated e.g. higher caseload for CTRS (Council Tax Reduction Scheme) discounts /lower number of new properties / more student exempt properties / more SMI exemptions / more discounts awarded /, resulting in a deficit on the collection fund	3	3 0.1% reduction in council tax base = £0.193m	9	Would require reductions in budgets (increased savings) for the following year	Close monitoring of the collection fund and checking validity of exemptions and discounts particularly new property developments, student numbers, CTRS discounts and empty property discounts. Through major projects, working with further education establishments to encourage development of more dedicated student accommodation.
Collection of council tax, including CTRS claimants, falls due to its impact on household budgets alongside other Welfare Reform impacts, resulting in a deficit on the collection fund	3	3 0.1% reduction in council tax collection = £0.193m	9	Would require reductions in the budget (increased savings) for the following year	Close monitoring of the collection fund, including claimants under the CTRS. Appropriate communications, advice (linked to Welfare Reform advice services) and collection strategies have been agreed to minimise impact.
Services fail to operate within set budgets due to increased service demands or weak systems of demand management	3	4 1% gross expenditure on demand led budgets = £3.1m	12	Excess service pressures would have to be met through additional resources, such as reserves, or through unplanned savings having to be made elsewhere. Possible need for emergency spending and/or recruitment restrictions with	Close monitoring and analysis of demand-led budgets and overall budget through budget monitoring (TBM). Identify action plans to mitigate cost pressures. Health & Social Care system management activity prioritised through integrated

Risk	Likelihood (L)	Impact / Sensitivity (I)	Risk = (L) x (I)	Possible Impact on Financial Strategy	Mitigation / Management
				potential impacts on service delivery and quality. Reduction in reserves / working balance. Value for Money qualification of accounts through not securing economy, efficiency and effectiveness in the use of resources.	commissioning and working towards an Integrated Care System. Strategic Corporate Plan investments provided for ASC, Children's Social Care and Homelessness demand-led pressure areas.
Services fail to operate within set budgets due to unachievable income or poor collection performance	3	3 1% of fees and charges income = £1.2m	9	Income pressures that can only be met through additional resources, such as using reserves, or savings being made elsewhere in the budget. Possible need for emergency spending and/or recruitment restrictions with potential impacts on service delivery and quality. Reduction in reserves / working balance. Value for money qualification of accounts by not securing economy, efficiency and effectiveness in the use of resources.	Monitoring of income budgets and collection performance (rates) through TBM reporting. Identify action plans to mitigate unachievable income, price variations and exceptional legal costs. In-year review of charging policy and revised charges approved if absolutely necessary. Internal Audit review of services where performance issues or financial concerns are identified.
Services fail to operate within set budgets due to increased labour or supply chain costs,	4	4 1% gross expenditure = £5.2m	16	Excess costs would have to be met through additional resources, such as reserves, or through unplanned	Close monitoring of budgets and overall spend through budget monitoring (TBM).

<b>Risk</b>	<b>Likelihood (L)</b>	<b>Impact / Sensitivity (I)</b>	<b>Risk = (L) x (I)</b>	<b>Possible Impact on Financial Strategy</b>	<b>Mitigation / Management</b>
contract price variations or other inflationary impacts				savings having to be made elsewhere. Possible need for emergency spending and/or recruitment restrictions with potential impacts on service delivery and quality. Reduction in reserves / working balance. Value for Money qualification of accounts through not securing economy, efficiency and effectiveness in the use of resources.	Identify Financial Recovery action plans to mitigate specific areas experiencing cost pressures. Focus contract management resources to areas of concern. Consider financial management controls such as vacancy management and additional spending controls.
<p>Services fail to operate within set budgets due to unachievable savings arising from:</p> <ul style="list-style-type: none"> <li>- Over-estimate of the savings potential;</li> <li>- Industrial relations issues;</li> <li>- Withdrawal of political support;</li> <li>- Higher than estimated costs to implement the savings opportunity.</li> </ul>	3	3 5% of GF savings = £1.2m	9	Overspending that can only be met from additional resources such as reserves or savings being made elsewhere in the budget. Possible need for emergency spending and/or recruitment restrictions with potential impacts on service delivery and quality. Reduction in reserves / working balance.	Monitor savings through TBM and identify action plans and/or alternative measures to mitigate the unachievable savings. Potentially refer back to members for decisions on alternative savings proposals where these are significant or cannot be mitigated elsewhere.
Pay assumptions are lower than finally agreed pay awards and other pay related costs.	3	3 0.5% change in pay award	9	Pay award pressures can only be met through additional resources, such as reserves, or savings being made elsewhere in the	Monitor progress on pay award negotiations and wider national settlements. Lobby government for more funding if nationally negotiated

Risk	Likelihood (L)	Impact / Sensitivity (I)	Risk = (L) x (I)	Possible Impact on Financial Strategy	Mitigation / Management
Note: pay award assumptions generally follow government inflation predictions.		= £0.8m for the General Fund		budget. Possible need for emergency spending and/or recruitment restrictions with potential impacts on service delivery and quality. Reduction in reserves / working balance.	pay awards are significantly higher than local or national assumptions (e.g. assumed within the Chancellor's Spending Review and inflation assumptions). As with 2023/24, higher pay awards need to be addressed in-year through financial management controls and then built into budget planning (MTFS) for future years.
PFI Waste tonnages higher than projected resulting in additional disposal costs	2	3 1% increase in tonnage per annum = £0.2m p.a. over life of PFI contract	6	Would increase the waste disposal budget and compensating savings would need to be identified elsewhere in the budget.	Provision (contingency) for higher tonnages made in the assessment of the waste PFI reserve for future years. Monitor and identify specific areas of growth and undertake waste minimisation and further recycling measures. Trends are monitored and reflected in the MTFS for future years.
Inflation continues to impact on contracted social care provider costs	4	4 1% increase in contract prices = £1.8m	16	Excess costs would have to be met through additional resources, such as reserves, or through unplanned savings having to be made elsewhere. Possible need for emergency spending and/or recruitment restrictions with	Identify Financial Recovery action plans to mitigate specific areas experiencing cost pressures. Focus contract management resources to areas of concern. Consider financial management controls such as vacancy

Risk	Likelihood (L)	Impact / Sensitivity (I)	Risk = (L) x (I)	Possible Impact on Financial Strategy	Mitigation / Management
				potential impacts on service delivery and quality. Reduction in reserves / working balance. Value for Money qualification of accounts through not securing economy, efficiency and effectiveness in the use of resources.	management and additional spending controls.
The uncertainties within the housing market, changes in housing benefit and welfare reform, or ongoing impacts of the cost of living crisis create spending pressures within the budget e.g. homelessness	4	3 10% increase in net temporary accommodation and rough sleeping budget = £1.3m	12	Would create additional pressures in the Housing Strategy and potentially other related budgets which would need to find compensating savings.	Continue to assess and monitor the potential impact of changes to the welfare benefit system and plan and respond to government consultations accordingly. Lobby Government for additional funding.
Increased property related insurance premiums as a result of national or international storm damage claims over the longer term	3	2 10% further increase = £0.3m	6	Would require compensating savings to be identified in 2025/26 and future years.	Insurance premiums have been retendered and are reviewed annually. Budget has planned increase in 2025/26 as price increases expected Continued emphasis on risk management to help prevent future claims.
Major civil incident occurs e.g. storm, flooding, riot	2	3 Estimated "Bellwin" threshold = £0.5m	6	Budget overspend / reduction in reserves / working balance. Pressures on other budgets. The council would have to meet the costs of uninsured	Ensure adequate levels of useable reserves and working balance to cover threshold expenditure. Ensure appropriate insurance cover is in place and that the

Risk	Likelihood (L)	Impact / Sensitivity (I)	Risk = (L) x (I)	Possible Impact on Financial Strategy	Mitigation / Management
				risks in addition to the “Bellwin” threshold.	Insurance Fund is sufficient to cover uninsured risks.
Severe winter weather places additional spending pressures on winter maintenance and other budgets across the council	2	3 Depends on severity of weather event	6	Need to use Working Balance and/or reserves.	Advance planning to minimise possible disruption. A plan to replenish the Working Balance in future years would be required.
Cost overruns occur on schemes in the agreed capital programme	3	2 1% cost overrun on total 2024/25 programme = £2.1m	6	Reserves or other capital resources redirected to fund overspend. Unable to meet capital investment needs. Increased borrowing requirement.	Effective cost control and expenditure monitoring. In the first instance, use flexibility within or across programmes to re-profile expenditure if necessary. Flexing Capital Financing Strategy or HRA self-financing strategy as appropriate.
Capital receipts lower than anticipated	3	3 10% reduction in planned 2024/25 receipts = £1.6m	9	Fewer resources available for regeneration programmes, Transformation Fund and corporate Capital Funds	Flexible capital programme that allows plans to be reduced or re-profiled. Alternative site disposal plans are capable of being accelerated if necessary. Borrowing is an option for invest-to-save schemes.
Income from business rates is lower than expected due to successful rating appeals / higher levels of relief awarded / redevelopment of existing sites gives temporary reduction / collection performance declines	3	3 1% of forecast retained business rates income = £0.9m	9	Would require an increased budget gap to be addressed in the following financial year.	Make appropriate provisions in resource forecasts. Detailed monitoring of business rates yield and collection to ensure it reflects the latest known position.



Risk	Likelihood (L)	Impact / Sensitivity (I)	Risk = (L) x (I)	Possible Impact on Financial Strategy	Mitigation / Management
					Corporate approach to economic development and city regeneration.



# Brighton & Hove City Council

## Cabinet

## Agenda Item 65

**Subject:** Parking Review update

**Date of meeting:** 26<sup>th</sup> September 2024

**Report of:** Cabinet Member for Transport, Parking and Public Realm

**Contact Officer:** Name: Corporate Director for City Services

Email: [Charles.Field@brighton-hove.gov.uk](mailto:Charles.Field@brighton-hove.gov.uk)

**Ward(s) affected:** (All Wards);

**Key Decision:** Yes

**Reason(s) Key:** Is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

### For General Release

#### 1. Purpose of the report and policy context

- 1.1 The Council is seeking to deliver a new approach in Parking Policy to stabilise in the short term and then re-set the budget situation in the longer term. In November 2023 the Council commissioned external consultants to help review and assess how these changes could be made to secure a more sustainable service and budget model.
- 1.2 The review determines how the City's future Parking Policy is also aligned with the Council Plan. The Parking Review has considered the current baseline data for parking in Brighton & Hove and based on the results of this exercise, has formulated a series of objectives and actions to improve parking in the City for its residents, visitors and local businesses.
- 1.3 This policy shift in the approach to parking is consistent with the direction outlined in the Council Plan 2023 – 2027 in relation to the following:
  - Outcome 1: A city to be proud of.
    4. Make it easier for people to move around the city.
  - Outcome 4: A responsive council with well-run services.
    1. Meeting the needs of our residents and other customers
    3. Good governance and financial resilience

#### 2. Recommendations

- 2.1 Cabinet agrees to taking forward the new Parking Policy aims and objectives as detailed in paragraph 3.9 below and in Appendix 1.
- 2.2 Cabinet agrees to the Parking Services 24/25 Action Plan as summarised in Table 1 to ensure actions are included as part of the Council's Medium Term

Financial Plan. This aims to reduce the current under-achievement of the £45.5m parking income budget this financial year.

- 2.3 Cabinet agrees the medium to long term action plan and financial appraisal to deliver the new Parking Policy contained in Appendix 3.

### **3. Context and background information**

- 3.1 Parking can be a controversial policy area with significant impact on the daily lives of residents, businesses and the 11 million visitors who visit the City each year. Whilst visitor numbers are growing again, parking revenues are not matching this increase.
- 3.2 It is recognised that over the past five years parking tariffs in Brighton & Hove have increased to the extent they have become more of a deterrent than an incentive and prohibitively expensive for some visitors. This has led to fewer cars coming into the City centre to park.
- 3.3 The number and extent of Controlled Parking Zones (CPZs) have also increased over time as greater pressure on neighbouring areas have led to new CPZs being requested by residents. This has led to a knock-on effect where further parking pressures have rippled out from the centre, affecting outlying parts of the City.
- 3.4 Over several decades, at least 200 different tariffs have been established, which include high, medium, and low emission tariffs for resident permits and visitor on-street parking. As a result, there is now a complex array of parking tariffs that are likely deterring visitors and residents alike.
- 3.5 In late June 2023 and in response to further parking fee increases approved in the February 2023 Budget Council, a review of all planned changes to parking fees and charges was announced. Commercial and marketing roles within Parking Services were recently established to strengthen the business approach to achieving financial sustainability.
- 3.6 Following the announcement, in July 2023 the Council sought to procure external consultants to develop an initial review by Autumn 2023. However, due to limited interest from the commercial market the Council undertook an initial review in-house. This set the scene for a larger piece of work to be procured externally and to layout initial findings for the Autumn of 2023. Returns were submitted by two suppliers on 27th October 2023.
- 3.7 Following analysis and scoring of the tenders, the Contract was awarded to Mott MacDonald consultants who provided the most economically advantageous tender submission based on the Project Team, Project Plan Model, and costs.

### **Parking Review Objectives**

- 3.8 In terms of the methodology, an initial series of actions were generated, based on the following:
- Findings from the data baselining analysis.

- Research into parking measures and initiatives introduced in UK, European, and North American cities.
- Best practice examples from other parking studies and strategies undertaken by Mott MacDonald.

3.9 Actions were categorised based on the five main objectives and sub objectives outlined in Appendix 1 as follows:

- **Objective 1: Parking in the City is fair and simplified.** Reviewing the type of permits and payment options available to customers and how they access them.
- **Objective 2: Optimise Parking resources to support making the City a place where people want to live, work and visit.** How parking schemes are operated in terms of their size, type, and duration. This includes reporting capabilities and improvements to enforcement. There would also be a focus on short-term pricing changes and more paid parking to ensure parking meets the needs of the city and optimises usage.
- **Objective 3: Efficiently manage movement on the transport network to promote a safer, healthier, and more accessible City.** How vehicle parking is operated, how to improve usage and how we should strategically price tariffs and rates of off-street car parks. There would also be a focus on the relationship between on and off-street parking to ensure they are closely aligned as well as the use of bays.
- **Objective 4: Use our assets to support an inclusive economy with robust financial management.** Marketing and commercialism, looking at promotion and awareness of our existing assets and raise awareness for new schemes and programmes through communications. This is also focused on monitoring the effectiveness of the current Red Route rollout and other new initiatives.
- **Objective 5: Ensure good governance and well-run services.** Ensuring we make the best use of our on-street and off-street assets in terms of safety, maintenance, and cost effectiveness.

### **Parking Review Actions**

3.10 Ultimately the parking review conducted by the external consultants produced a number of recommended actions to improve parking in the City for residents, visitors and local businesses. Actions were then categorised as being deliverable in the short term (by 2025) or medium term to long term (by or after 2030). Short term actions are identified in Table 1 below and medium to long term actions are included in Appendix 3.

**Table 1 – Short term action plan**

Timeline												
Recommendation	Level of Upfront Investment	Likely Revenue Return	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Jan-25	Feb-25	Mar-25	Apr-25	
Review the Resident Permit options	Low (up to £10k)	Further study										
Review signage to promote PayPoint	Medium (£10k to £100K)	Low										
Trialling reduced fees for underutilised parking	Low (up to £10k)	Medium										
Implement paid parking in underutilised light touch	Low (up to £10k)	Medium										
Consider merging evening and overnight car park rates	Low (up to £10k)	Further study										
Introduce early bird/commuter rates	Low (up to £10k)	Further study										
Offer weekend parking tickets (Friday to Sunday)	Low (up to £10k)	Low										
Ensure City Parks tariffs/restrictions align with nearby parking zones	Low (up to £10k)	Low										
Ongoing review of Contract value for money	Low (up to £10k)	Further study										
Continuing the financial recovery plan for 24/25	Low (up to £10k)	High										

- 3.11 An initial high-level analysis of each action was undertaken, which included potential benefits, drawbacks, risks, timeframe of implementation, level of upfront investment, likely revenue return and feasibility.
- 3.12 Each action contains a high-level audit including a potential timeframe for implementation, level of upfront investment required, likely revenue return, and feasibility. The actions included detailed financial modelling and as part of the high-level audit of all actions, timelines were produced for each action under their respective objective and theme. Actions were then categorised as being deliverable in the short term (by 2025) or medium term to long term (by or after 2030) earlier in the report.

### Scope of the Parking Review

- 3.13 The primary purpose of the parking review was to establish a series of objectives and recommendations to bring about a simpler, more equitable, accessible and an inclusive parking service for the City. The review provides a set of recommendations and anticipated outcomes, timeframes, indicative investment, likely feasibility and, where applicable, financial forecasting. The review supports the efficient and sustainable operation of Brighton & Hove's parking assets.
- 3.14 The study covered 26 CPZs within Brighton & Hove, BHCC operated off-street car parks (barrier and surface car parks), and other paid on-street parking areas that fall outside the 26 parking zones, such as the Seafront.
- 3.15 As an initial stage, an extensive data baselining exercise was undertaken to understand all parking metrics in Brighton & Hove. The review then identified key challenges and opportunities that informed the objectives and recommendations. This is outlined in more detail from paragraph 5.1.
- 3.16 The data baselining exercise was supplemented by a Future Needs Assessment, which considered local policy related to parking and future developments in Brighton & Hove.

- 3.17 The Future Needs Assessment looked at the local planning policy relevant to the Parking Review such as the Brighton & Hove City Plan parts 1 & 2 and the Brighton & Hove Local Transport Plan 4 as well as other relevant Brighton & Hove policies such as the Bus Service Improvement Plan (BSIP), the Local Cycling and Walking Infrastructure Plan (LCWIP), the Public Realm Strategy and the Safer Road Strategy. These policies were all considered alongside the direction of the overarching Council Plan.
- 3.18 The review looked at which future developments would affect transport and parking in the City. Several private and public developments were identified including the rejuvenation of Black Rock development area, Madeira Terrace, King Alfred Centre, the Corn Exchange, and Valley Gardens. Several of the committed developments are council led. Additionally, there are significant private committed developments in Brighton and Hove.
- 3.19 Following the data baselining exercise, policy review and Future Needs Assessment, five main objectives and sub-objectives were developed (see Appendix 1) in conjunction with Councillors and officers in Brighton & Hove Parking Services.

#### **4. Analysis and consideration of alternative options**

- 4.1 The actions within this report are recommended to be taken forward to meet the objectives set out in paragraph 3.9.
- 4.2 During the parking review several different options were considered. Developing or use of an application (app) to identify parking availability across the City is being investigated. Re-introducing pay and display machines is now being taken forward separately as part of a trial.
- 4.3 Improving pedestrian access with signage to outer car parks will need liaison with other council teams separate to the recommendations outlined within this report.
- 4.4 The adoption of a larger parking zone system was considered. This was discounted because it would bring internal commuting and congestion risks through vehicles moving within a single zone. It was considered more effective to review boundaries and merge parking zones rather than changing the zone system entirely.
- 4.5 QR codes were removed from the recommendations due to concerns over the widespread fraudulent use of these nationally.

#### **5. Community engagement and consultation**

- 5.1 The parking review utilised extensive data provided by the BHCC Parking Services team on customer behaviours, combined with desk-based research. This exercise covered the 26 parking zones, parking permit costs and uptake, on-street and off-street parking tariffs, and on-street and off-street parking utilisation. Where applicable, a comparison of permit costs and parking tariffs between Brighton & Hove and seven other comparable

locations was also included. This identified key findings as outlined in Appendix 2.

- 5.2 An overview with the actions to take forward was brought forward as part of a Parking Strategy Review Workshop for discussion with BHCC councillors, senior officers, and the Parking Services Team. The feedback received during this workshop was taken into account when considering the actions to take forward. Where a recommendation generated considerable interest and discussion, further detail was provided.
- 5.3 Many of the actions outlined will require further engagement and consultation with the public to take forward. This could involve initial and detailed consultation and / or a formal consultation through the advertisement of Traffic Regulation Orders. Some actions may be undertaken as trials to review the effectiveness of short-term changes with public feedback used to shape the way forward.

## **6. Financial implications**

- 6.1 Parking services is forecasting a £1.156m under achievement for 2024/25 as at Month 2 due to income demand loss. The parking review has outlined objectives and actions to reflect the Council Plan outcomes, but specifically to address the parking deficits in both the short term and long term.
- 6.2 Table 1 summarises the action plans for the short term with most items relating to increasing demand for Council paid parking through reduced or discounted tariffs of underutilised parking areas, as well as a review of Contracts value for money and identifying new income opportunities, rather than increasing tariffs to meet income targets. The action plan also includes the financial recovery plan for 24/25 which aims to address the deficit by the end of the financial year through various options including reviewing existing resource and expenditure commitments, reviewing the PCN bad debt provision requirements and promoting car parks through BHCC social media channels.
- 6.3 Recommendations within Table 1 that are trialling reduced or discounted tariffs do have a risk because if parking demand does not increase, income may reduce from the lower tariffs introduced. However it is anticipated that these measures would stimulate demand and generate increased paid parking income. The revenue return for the current 2024/25 financial year will have a part-year affect based on when the recommendation is actioned, and after accounting for the additional investment is anticipated to reduce parking deficits. The costs associated with the recommendations of this report including expenditure related with advertising Traffic Regulation Orders (TROs) for changes will be contained within existing Parking Services budgets and/or funded from additional parking income generated through the increased demand.
- 6.4 Appendix 3 summarises the action plans for the medium to long term. Further financial appraisals would be required as highlighted in paragraph 6.3 before any action is implemented.



- 6.5 Use of surplus income from parking charges and penalty charges is governed by section 55 of the Road Traffic Regulation Act 1984. Once the direct costs of traffic management have been met, the use of surpluses is legally ringfenced to the provision of public transport services, highway maintenance, highway improvements, road safety, air quality and environmental improvements.

Name of finance officer consulted: John Lack    Date consulted (22/08/24)

## **7. Legal implications**

- 7.1 The Council has a duty under the Road Traffic Regulation Act 1984 to exercise its powers to secure the safe and convenient movement of traffic and the provision of adequate on and off-street parking facilities. It has powers under this Act to make orders to regulate traffic and designate parking places. Regulations prescribe the procedure for making new orders, including the requirement for the public to be consulted.
- 7.2 The Council must also consider any implications the orders would have for access to premises, local amenity, air quality, public transport provision and any other relevant matters. When undertaking consultation, the Council is under a general duty of fairness and must take into account any human rights implications and equality impacts that may arise as a result of the proposals. Parking and traffic restrictions have the potential to affect the right to respect for family and private life and the right to protection of property. These are qualified rights and may be restricted where this is for a legitimate aim and is necessary and proportionate.
- 7.3 Further appraisal of legal implications will need taken before individual plans or orders are implemented.

Name of lawyer consulted: Katie Kam    Date consulted (28/08/24)

## **8. Equalities implications**

- 8.1 An Equalities Impact Assessment will be taken forward alongside the proposals if they are taken forward. This will be discussed further with the Communities, Equalities and Third Sector team to ensure any equalities impact is fully considered.

## **9. Conclusion**

- 9.1 The recommendations in section 2 of the report if agreed would be taken forward with progress reported to the Cabinet Member for Transport, Parking and Public Realm.
- 9.2 If agreed, the 24/25 action plan would be taken forward as summarised in Table 1 within the report. Some of this has already been proceeding as part of the Parking Services Financial Recovery Plan for 24/25 and will ensure the council takes a pro-active approach to the current budget situation.

- 9.3 The medium term and longer-term actions summarised in Appendix 3 would be taken forward if agreed. Further work will involve scoping out the priorities, consultation and detailed timelines alongside more detailed financial appraisals.

## **Supporting Documentation**

### **Appendices**

1. Appendix 1 – Parking Review Objectives & Sub Objectives
2. Appendix 2 – Key findings
3. Appendix 3 – Medium to long term action plan

## Appendix 1 – Parking Review objectives and sub-objectives

<b>1. Parking in the city is fair and simplified</b>	<b>2. Optimise Parking resources to support making the city a place where people want to live, work and visit.</b>	<b>3. Efficiently manage movement on the transport network to promote a safer, healthier, and more accessible city</b>	<b>4. Use our assets to support an inclusive economy with robust financial management.</b>	<b>5. Ensure good governance and well-run services</b>
1A. Simplified on street and off-street tariff structures.	2A. Issue permits to future car free developments where provision allows.	3A. Review times of restrictions and enforcement to support the nighttime economy.	4A. Rename car parks after close-by attractions to promote visitors.	5A. Lost income due to initiatives is recouped or flagged as a budget pressure.
1B. Align City Parks tariffs with on street.	2B. Review tariff rates for car parks to encourage parking during quiet periods.	3B. Introduce more Red Routes to ensure better enforcement and reduced congestion.	4B. Ensure best use and value is being received from our car park assets.	5B. Virtual permit types and introduce monthly payments.
1C. Adopt one model for parking scheme restriction days and times.	2C. Address under used parking zones to identify new opportunities for parking.	3C. Explore the option of virtual Resident Visitor permits.	4C. Review leased car parks and whether it would be appropriate for those not under a long-term lease to be brought in house.	5C. Protect income through investment in counter fraud team and anti-fraud initiatives.
1D. Simplify permit rules.	2D. Ensure bays in parking zones are fit for purpose and need.	3D. Fair and effective parking enforcement, including sufficient ANPR and CCTV Enforcement hours.	4D. Review car park life care plans and confirm viability.	5D. Review on and off-street permit types to ensure they are fit for purpose.
1E. Review signage promoting PayPoint outlets for visitors	2E. Optimise parking space on street to meet need.	3E. Review enforcement options for virtual permits.	4E. Ensure parking physical assets (signs/road markings) are well managed and maintained.	5E. Maximise contract value and promote partnership working with suppliers.
	2F. Review zone types and zone boundaries.	3F. Push for legislation to support parking initiatives for areas of concern (pavement parking).		



## Appendix 2 - Key Findings

BHCC's Parking Zones encompass 1,057 streets and 46,728 controlled on-street parking bays. 65% are permit holder only spaces while 27% are shared / paid bays

Average on-street parking occupancy is highest in the high demand Parking Zones in the city centre and decreases for Parking Zones further away from the city centre.

Residential parking permit uptake is at 100% in the high demand Parking Zones in the city centre. Some Parking Zones on the periphery of the city centre show permit uptake 80 -90%.

The average residential parking and business permit cost across all of BHCC's Parking Zones for all emissions categories is higher than the majority of cities compared.

The average hourly on-street parking tariff in the central and seafront parking zones in BHCC is higher than the majority of other cities (2 hours or for up to 11 hours)

The average hourly parking tariff of parking in an off-street car park in the centre of BHCC (4 hours and up to 9 hours) is higher than the majority of other cities compared.

Centrally located BHCC car parks have on average higher occupancy than those located away from the city centre. London Road is significantly underutilised.

Since 2021, all BHCC operated off-street car parks have seen a steady decrease in average occupancy levels.



## Appendix 3: Medium/Long Term Action Plan

Recommendation	Level of Upfront Investment	Likely Revenue Return	Timeline		
			2025	2027	2030
Continue trial of virtual parking permits	Medium (£10k to £100K)	Medium			
Offer displacement permits in adjoining zones	Low (up to £10k)	Medium			
Reduce emission categories for all permits to two	Medium (£10k to £100K)	Medium			
Explore options for vehicle size based charges	High (£100k plus)	Further study required			
Explore option of Demand Responsive Parking trial	High (£100k plus)	Further study required			
Create or merge new parking zones	Medium (£10k to £100K)	Low			
Simplify parking scheme restrictions and times	Medium (£10k to £100K)	Further study required			
Additional colour coding for tariffs and schemes	Medium (£10k to £100K)	Further study required			
Increase accessibility of 3rd party reporting for enforcement	Medium (£10k to £100K)	Medium			
Greater enforcement of pavement parking (Gov powers pending)	Medium (£10k to £100K)	Low			
Rename car parks after close by attractions	Low (up to £10k)	Medium			
Treat London Road car park as a commuter car park	Low (up to £10k)	Further study required			
Online 'top up' car parking payment accounts	Medium (£10k to £100K)	Further study required			
Review car park safety/implement improvement measures	High (£100k plus)	Low			
Improve legibility of car park signage	Medium (£10k to £100K)	Medium			
Boost awareness of Park Active car parks	Medium (£10k to £100K)	Medium			
Promote and maintain car park accreditation	Medium (£10k to £100K)	Low			
Review feasibility of altering car park entrances/exits	High (£100k plus)	Medium			
Ensure on street and off street tariffs are closely aligned	Medium (£10k to £100K)	Further study required			
Introduce seasonal parking charges for seafront/car parks	Medium (£10k to £100K)	Further study required			
Reallocation of parking for alternative users or other bay types	Medium (£10k to £100K)	Further study required			
Ensure loading bays are fit for purpose	Medium (£10k to £100K)	Low			
Promote assets, raise awareness for new schemes	Low (up to £10k)	Low			
Review and implement Red Routes roll out	High (£100k plus)	Further study required			
Ensure best use of parking assets	Medium (£10k to £100K)	Further study required			
Ensure car park life cycle plans are developed	Medium (£10k to £100K)	Further study required			
Convert permit spaces to paid when bays are lost from projects	Medium (£10k to £100K)	Further study required			
Provide multiple payment options for permits/virtual permits	Medium (£10k to £100K)	Low			
Ensure Counter fraud policy is updated and taken forward	Low (up to £10k)	Low			





# Brighton & Hove City Council

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## Cabinet

## Agenda Item 66

**Subject:** Supported Accommodation for Young People Placements

**Date of meeting:** 26 September 2024

**Report of:** Cabinet Member for Children, Families, Youth Services  
and for Ending Violence against Women and Girls

**Contact Officer:** Jacqui Parfitt: Head of Families, Children and Learning  
Services Commissioning

**Tel:** 07759 135856

**Email:** [jacqui.parfitt@brighton-hove.gov.uk](mailto:jacqui.parfitt@brighton-hove.gov.uk)

**Ward(s) affected:** All

**Key Decision:** Yes

**Reason Key:** Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

### For general release

#### 1. Purpose of the report and policy context

1.1 This report seeks approval for the procurement of good quality accommodation and support for young people (aged 16-24), to prepare them for independence, via an Accredited Provider List (APL).

1.2 The report supports the Council Plan outcome 3 'A healthy city where people thrive' by providing a better future for children and young people.

#### 2. Recommendations

2.1 Cabinet agrees to the:

(i) procurement of an APL and the award of an Agreement to successful applicants to be admitted onto the Approved Provider List for the provision of supported accommodation for young people placements in the independent sector for an initial term of four (4) years commencing on 1 July 2025 with an option to extend for a period or periods of up to two (2) years; and

(ii) call off contracts and individual placement agreements under the APL Agreement outlined at 2.1(i) above,

for an estimated value of up to £25.36m.

- 2.2 Cabinet agrees to delegate authority to the Corporate Director of Families, Children & Learning to take all necessary steps to procure, award, implement and extend arrangements set out in recommendation 2.1.
- 2.3 Cabinet agrees to delegate authority to the Corporate Director of Families, Children & Learning to integrate the outcomes of the Equalities Impact Assessment into the arrangements set out in recommendation 2.1.

### 3. Context and background information

#### Summary of the current service provision

- 3.1 To develop an Accredited Provider List interested providers respond to a set of questions which will demonstrate their suitability to provide a service to a quality that Council would expect for children and young people. These responses are evaluated internally through a strong criteria in order to generate an accredited provider list which will be the preferred route to placement for our young people.
- 3.2 The Council is under a statutory obligation to secure sufficient accommodation for Children in Care (CiC) and care leavers, that meets their needs and is within the local area wherever this is reasonably practicable. The Council acts as the corporate parent for CiC and has strong controls for safeguarding to manage the welfare of vulnerable children.
- 3.3 Supported accommodation is for young people who are assessed as needing support rather than care and are able to develop their independence skills with the aim of transitioning to full independent living. For young people aged 16 or 17, this is an alternative to receiving care in a foster care or residential child care placement.
- 3.4 The current number of the Council's supported accommodation for young people placements in the independent sector is shown below:

Figures at June 2024:

<b>Independent Sector Placements commissioned by Families, Children &amp; Learning</b>	
Staffed homes for 16-17 year olds	27
Floating support homes for 18-24 year olds	45

<b>Independent Sector Placements commissioned by Housing</b>	
Staffed homes for 16-17 year olds	2
Staffed or Floating support homes for 18-24 year olds	34

Staffed homes are where there is at least one member of staff on site. Floating support homes are unstaffed, however staff will visit for a set number of hours per week to offer support to the young people placed there.

The Council does not currently run any in-house supported accommodation for young people services.

- 3.5 There is a need to make supported accommodation for young people's placements in the independent sector and a compliant means of procuring these services is required.
- 3.6 The Council's budget for 2024-25 for supported accommodation for young people placements totals £4.728m, of which £3.49m is estimated to be the value of services being commissioned under this proposal. The balance of the budget is the cost of services commissioned by the Housing directorate under their homeless prevention duty and other arrangements such as university accommodation.
- 3.7 The estimated value of the APL during its life includes estimated spend by East Sussex County Council of £1m.
- 3.8 The Housing directorate recommissioned their requirement for supported accommodation for young people services in 2023, which is for their homeless prevention duty. These services are for larger accommodation units which can accommodate between 8 and 50 young people in each unit and are for lower levels of need that Families, Children and Learning commissioners require. The Families, Children & Learning commissioners typically place more complex young people requiring higher levels of support in smaller accommodation units as this reduces the risks associated with these placements.

#### Current procurement arrangements

- 3.9 The Council manages an existing APL for supported accommodation for young people placements approval for which was granted by the now decommissioned Housing & New Homes Committee on 16 November 2016. East Sussex County Council is entitled to access and use the existing APL but does not currently do so as they developed their own Approved List in 2023.
- 3.10 The APL re-opened for new applications in 2019, 2020, 2021 and 2023. The APL has been the Council's primary initial source of seeking supported accommodation for young people since 2018. The APL was extended to 30 June 2025 to aid the re-procurement process following the introduction of Ofsted regulation of supported accommodation services to young people aged 16 and 17.
- 3.11 The Council is not a named contracting authority on any other frameworks or Dynamic Purchasing Systems for these services.

#### Tender process for new APL agreement

- 3.12 In order to comply with the Public Contracts Regulations 2015 (PCR) and the Council's internal Contract Standing Orders (CSOs), a formal tendering process must take place to procure the new APL agreements.
- 3.13 On 16<sup>th</sup> September 2024, the Cabinet Office announced that the Procurement Act 2023 will now go-live on 24 February 2025 - a delay of four months from the original date of 28 October 2024, this is to allow time for a new National Procurement Policy Statement (NPPS) to be produced to ensure that public procurement supports delivery of its missions. The NPPS which sets out the Government's strategic policy priorities for public procurement is an essential element of the Procurement Act, and it is crucial that the new regime commences with a statutory NPPS aligned to the new Government's priorities.
- 3.14 Like the existing APL agreement, the new APL agreement will use elements of a framework and elements of a Dynamic Purchasing System ("DPS"). The new APL agreement will however now remain permanently open for new entrants for the duration of their term. The evaluation of applications will be undertaken at least twice per financial year, at the discretion of the Council and more frequently in the first 12 months of the APL being open. It will also now allow direct award and limited competition mini tenders, as well as previously open competition mini tenders. A Mini tender is the process of running a tender with a group of pre-qualified providers.
- 3.15 In order to meet the deadline for contract commencement on the cessation of the existing APL, a procurement timetable has been drawn up and comprehensive service specification is being drafted to accompany the invitation to tender. The service specification will be based on the existing service specification (as updated) and the National Contract specification.
- 3.16 The National Contract specification is a set of standard terms developed by commissioners across the country via a Local Government Association commissioning network and which is used by some local authorities and providers. It is varied according to local need, including using the New Economics Foundation Outcomes Framework ("Outcomes Framework") and adding requirements on sustainability, social value and anti-racist practice.
- 3.17 The Corporate Director of Families, Children & Learning will be asked to extend the APL for the optional period of up to 2 years if the APL continues to meet the needs of the young people being placed in supported accommodation and if it offers value for money.
- 3.18 East Sussex County Council has asked to be able to continue to access and use the new APL. Officers are supportive of this request as it is consistent with our commissioning strategy.

### Risk

- 3.19 Inflation has been high and whilst this has been managed under the existing APL, a new APL is likely to lead to higher pricing. Having maximum pricing, with the ability to determine actual pricing at the Mini Tender stage, and

including value for money in the criteria for Direct Award and Limited Competition helps mitigate some of this risk.

#### **4. Analysis and consideration of alternative options**

##### Consortium Commissioning

- 4.1 An alternative to a local APL would be for the Council to procure these services as part of a larger partnership. Tendering as part of a larger group outside of Sussex would not likely lead to material benefits as the local market for these services is considered to be good, with competition between a number of providers which helps improve quality and value for money.

##### Dynamic Purchasing System

- 4.2 A DPS is an umbrella agreement between a buyer (i.e. the Council) and one or more providers that allows the buyer to purchase services. It is an electronic system that is permanently open for providers to apply to join. A DPS is not favoured for these services as it does not give the same level of control over pricing or use of commissioning and procurement resource in comparison to an APL. The commissioning team also runs the brokerage service which seeks placements for children and young people, and this part of the role takes precedence and therefore impacts on the resource available to evaluate APL tenders if the evaluation dates are fixed.

##### Standard Framework

- 4.3 A standard framework is an umbrella agreement between a buyer (i.e. the Council) and one or more providers that allows the buyer to purchase services. It's fixed for a 4 year period and does not allow for new applications during this period. This is not favoured as a number of providers would be expected to be interested in applying to join the framework during its life. The current APL for these services had 8 providers when it commenced in 2018, and there are now 25 providers in 2024.

##### APL

- 4.4 An APL is considered to give better control of costs by fixing the providers' maximum pricing for the duration of the initial contract term, whilst allowing a degree of flexibility on admitting new suitably qualified providers to the APL.
- 4.5 There is a thriving local market for these services and the Council has generally been able to place young people locally in the City where it wishes to do so and where this is in the best interests of the young person. Naming East Sussex County Council on the APL is not expected to lead to competition for the same places as they will look to primarily place within their geographical boundary.

##### In-house Services

- 4.6 The Council periodically reviews the estimated cost of running supported accommodation for young people's services directly. This process will continue but on each previous occasion the estimated cost of setting up and running these services in-house has been judged to be more expensive than external provision.

#### Value for Money

- 4.7 Managing demand for placements has the greatest impact on value for money but this needs to be managed safely through care planning. Early Help interventions and planned step-down arrangements contribute to these plans by avoiding the need for placements or making placements that are cheaper than alternative services.

### **5. Community engagement and consultation**

- 5.1 West Sussex County Council received project funding from the DfE Innovation Programme in 2015-16. The project, which the Council participated in, included developing a new Outcomes Framework for social care placements.
- 5.2 The Outcomes Framework was developed by the New Economic Foundation and drafted through co-production with local authorities, providers, parent/carer representatives and CiC Council representatives. This Outcomes Framework sets out outcomes for children/young people in care and is now used by a number of local authorities across the country, including the Council. This Outcomes Framework will be used in the new APL.
- 5.3 Consultation has taken place with young people who have experience of using supported accommodation commissioned by the Council, with the Council's children's social work professionals and with providers. Changes to the service specification as a result of the consultation include the following areas: keyword format, keyword support, keyword reports, professionals meetings, room cleaning standards, staff introductions, staff qualifications and service charges.

### **6. Financial implications**

- 6.1 The APL has no financial value in and of itself but enables effective procurement of placements for young people. The estimated value of these placements in 2024/25 is £3.49m, in an overall budget for supported accommodation of £4.728m. With increasing costs of services for young people it is important that there is an efficient and effective procurement process in place to manage costs.

Name of finance officer consulted: David Ellis    Date consulted: 18/6/24

### **7. Legal implications**

- 7.1 The Council has a statutory duty under Section 22G of the Children Act 1989 to ensure there are sufficient placements in the local area to meet the

needs of children and young people in care. The recommendations in this report are in keeping with this power.

- 7.2 The Council is required to comply with the Public Contract Regulations 2015 in relation to the procurement and award of contracts above the relevant financial thresholds for services, supplies and works. A formal tendering process must take place to procure the new APL. The concept of an APL is not included in the PCR but these services are covered by the “light touch regime” and the Council has therefore considerable flexibility as to how it procures these services provided it complies with the principles of transparency and equal treatment. Economic operators will be able to apply to join the APL throughout its term. The Council’s CSOs will also apply.

Name of lawyer consulted: Manjinder Nagra      Date consulted: 14/08/24

## **8. Equalities implications**

- 8.1 A new Equalities Impact Assessment has not yet been undertaken as there has been no change to Council policy or budget, however it will be completed prior to tender. Young people receiving these services have a higher proportion who are male, of black and minority ethnic origin and of Muslim religion than the statistical demographic for the corresponding young people who live in the City or the corresponding total number of young people who are Children in Care or Care Leavers under the Council’s responsibility. The service specification will have specific provision to accommodate these young people’s needs.

## **9. Sustainability implications**

- 9.1 Subject to placement availability, placements for CiC and care leavers will be made as closely as possible to networks of family and friends and the young person’s current college or workplace, where this is safe to do so and in the young person’s best interests.
- 9.2 The service specification will require providers to support environmental sustainability in accordance with the areas recommended by use of the Council’s Sustainable Procurement Tool.

## **10. Health and Wellbeing Implications:**

- 10.1 Improving health and wellbeing are two of the key objectives within the Outcomes Framework.

### **Other Implications**

## **11. Procurement implications**

- 11.1 The proposed procurement approach was presented to the Procurement Lead Member who supported the preferred option detailed in this paper. The proposed reporting requirements for Key Performance Indicators and the draft service specification have been shared with the Procurement Lead Member.

- 11.2 Social Value will form part of the quality evaluation of the tender and score 10% of the total score. Providers will select from a range of Social Value outputs/activities submitting a Social Value Delivery Plan and written method statement, with the quality of the responses being evaluated by the evaluation panel on a scoring range of 0 to 5.

**12. Crime & disorder implications:**

- 12.1 The Outcomes Framework has a number of measures under basic needs (safety and health), functioning (control, relationships and achievement), personal resources (resilience, self-esteem and emotional intelligence) and preparation for adulthood (participation, independence, inclusion and wellbeing) that contribute to the prevention of crime and disorder.

**13. Conclusion**

- 13.1 It is necessary to re-tender these services as the existing APL agreement for supported accommodation for young people placements will expire on 30 June 2025. In order to build in sufficient time to carry out a fair and transparent procurement process, the process must commence as soon as possible.

**Supporting Documentation**

None



# Brighton & Hove City Council

## Cabinet

## Agenda Item 67

**Subject:** Mental Health Support Services for Adults

**Date of meeting:** 26 September 2024

**Report of:** Cabinet Member for Adult Social Care, Public Health and Service Transformation

**Contact Officer:** Name: Steve Hook, Interim Corporate Director (Health & Adult Social Care)  
Bernadette Alves, Consultant in Public Health

**Tel:** 01273 29

**Email:** [Bernadette.Alves@brighton-hove.gov.uk](mailto:Bernadette.Alves@brighton-hove.gov.uk)

**Ward(s) affected:** (All Wards);

**Key Decision:** Yes

**Reason(s) Key:** Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000.

**For general release**

### 1. Purpose of the report and policy context

- 1.1 This report asks for agreement to jointly commission community mental health support (MHS) services for adults with NHS Sussex Integrated Care Board (ICB). The procurement is to be led by the ICB, and the proposed contract is to be for seven years (five years plus optional two-year extension) from October 2025. The current MHS service is called UOK (previously known as Community Roots) and is provided by a network of local voluntary and community sector organisations.
- 1.2 Mental Health has been identified through the city's Health & Care Partnership and the Health & Wellbeing Board as one of our five population health priorities for the city. Mental health need within the city is high and growing.
- 1.3 MHS services can improve mental health outcomes for residents, reduce inequalities. MHS services support the Council's public health duty to improve the health and wellbeing of residents and deliver against city priorities including outcomes in the Council plan as outlined below<sup>1</sup>:

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<sup>1</sup> [The Brighton and Hove City Council Plan 2022 to 2027](#)

1. **A city to be proud of.** Good mental health and wellbeing for those living and working in the city will increase productivity, reduce sickness absence and create an environment where everyone can flourish.
2. **A fair and inclusive city.** The service will aim to ensure equitable access to support and information, particularly for local communities at increased risk of mental ill health.
3. **A city where people can thrive.** MHS Service will enable people to live healthy, happy and fulfilling lives through offering advice, targeted support and working in collaboration with local communities, to promote good mental wellbeing and reduce the risk of suicide
4. **A city of responsive and well-run Council services.** The MHS Service will listen to communities through engagement and collaboration to shape service delivery and to build on their assets.

## 2. Recommendations

- 2.1 Cabinet delegates authority to the Corporate Director of Housing, Care and Wellbeing to participate in a procurement process, conducted by the NHS Sussex ICB for community mental health support services for adults.
- 2.2 Cabinet agrees to the award of a contract via the procurement process set out in 2.1 and delegates authority to the Corporate Director of Housing, Care and Wellbeing to enter into the contract with the successful bidder for the provision of community mental health support services for adults. The length of the contract to be five years from 1 October 2025 with the option to extend by a further two years on the basis of satisfactory performance by the service provider.

## 3. Context and background information

### 3.1 Strategic context

- 3.1.1. The MHS service is universal and preventative and can reduce costs in the future. Prevention is cost-effective and intervention can both prevent mental health problems from arising in the first place, and through early identification and intervention, prevent them from becoming more severe<sup>2</sup>. Taking a preventative approach can reduce the need for more specialist services and support from adult social care. Continued joint investment in community MHS services for adults strengthens the local preventative approach to improving population wellbeing and reducing health inequalities.
- 3.1.2. Mental Health is one of five population health priorities in the Brighton and Hove Shared Delivery Plan<sup>3</sup> and underpins and contributes to several of the other priorities. The city's Shared Delivery Plan is aligned with the five-year Sussex Integrated Care System Strategy *Improving Lives Together*.<sup>4</sup>
- 3.1.3. MHS services contribute towards delivery of key city strategies including [The Brighton & Hove Joint Health and Wellbeing Strategy 2019 – 2030](#)

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<sup>2</sup> [MHF-Investing-in-Prevention-Report-Summary.pdf \(mentalhealth.org.uk\)](#)

<sup>3</sup> [Shared Delivery Plan \(ics.nhs.uk\)](#)

<sup>4</sup> [Our strategy - Sussex Health & Care \(ics.nhs.uk\)](#)

### **3.2. Local Need**

3.2.1. The city has high and growing levels of mental health need and high rates of death by suicide. A recent joint assessment of population need within the city<sup>5</sup> found that:

- A higher proportion of adults in the city experience common mental health conditions such as depression or anxiety (Brighton & Hove 1 in 5, England 1 in 6).
- A higher proportion of adults are on GP registers for severe mental illness such as schizophrenia or bipolar disorder (Brighton and Hove 1.3% of adult patients, England 0.95%).
- A statistically significantly higher suicide rate in the city (Brighton & Hove rate is 1.5 times higher than England).
- Statistically significantly higher rates of hospital admissions for self-harm for 10-24 year olds (Brighton and Hove rate is 1.3 times higher than England).

3.2.2. The needs assessment identified communities at increased risk of experiencing poor mental health including those living in more deprived areas, people who engage in harmful drug or alcohol use and people with multiple compound needs (meaning they have experienced at least two of the following: homelessness, mental ill health, domestic abuse, harmful drug or alcohol use or offending behaviour).

3.2.3. Local insight highlights that wellbeing and mental health is a community priority. Three out of four recent city-wide health forums identified mental health as one of the community's key priorities with a particular focus on children and young people. The fourth forum highlighted social isolation and the impact that has on people's physical and mental health.

### **3.3. Current community mental health support service for adults**

3.3.1. The current MHS service for adults began in October 2019 and was jointly commissioned by Brighton and Hove City Council and Brighton and Hove CCG (Clinical Commissioning Group). In July 2022, the CCG was abolished and its functions assumed by the NHS Sussex ICB (Integrated Care Board). The contract for the current service called UOK ends on 30<sup>th</sup> September 2025.

3.3.2. The UOK service is delivered by a network of local voluntary and community sector organisations, led by a single provider, Southdown (providers are listed in Appendix 1). It provides support for people experiencing mental ill health and their friends, family and carers. The service promotes wellbeing and prevents mental ill health through offering advice, information, education, system coordination, wellbeing hubs and a range of psychosocial services including 1 to 1 and group work.

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<sup>5</sup> [Brighton and Hove all-ages Mental Health and Wellbeing Needs Assessment](#)

### 3.3.3. Elements include:

- A central access point for information, advice and referrals
- Individual and group psychosocial support tailored to communities at increased risk of mental ill health
- Three Wellbeing Hubs providing psychoeducation, a drop in wellbeing centre, support for people with complex emotional needs
- Specialist support for people with severe mental illness including employment support and physical health checks
- An out of hours mental health crisis support service
- Training for professionals that support adults experiencing mental ill health on topics such as mental health awareness, self-harm awareness and suicide prevention

3.3.4. Overall, performance has been good since the contract began in 2019. The service has delivered well on its objectives, received positive feedback from service users, and has been responsive to service user experience feedback. There has been a year on year increase in the number of people accessing the services. Key activity in 2023/24 included:

- Over 20,000 people visited UOK website to access information and advice on local mental health support
- Over 6,000 adults accessed and received psychosocial support
- Over 1,600 hours of 1:1 support sessions provided
- Almost 1000 group sessions provided with over 10,000 attendances
- Over 3,000 adults received peer support
- Over 600 adults supported by out-of-hours mental health crisis support service
- Where patient reported outcomes were collected, 85% of service users reported an improvement in their wellbeing

3.3.5. The original contract value in 2019 was £2.108m per annum, of which the ICB contributed approximately 80% (£1.699m) and Brighton & Hove City Council approximately 20% (£0.409m). The ICB investment has varied over the lifetime of the contract whereas the BHCC contribution has not changed. In 2024/25, the contract value was £2.398m, made of up £0.409m from BHCC, and £1.989m from the ICB.

## 3.4. Reprourement

3.4.1. The intention is to run a competitive tender for the new MHS service with a contract length of five years plus a two-year optional extension. The ICB is conducting the procurement and will manage the procurement and legal process. The new service will start on 1<sup>st</sup> October 2025.

3.4.2. The procurement covers services across both Brighton and Hove and West Sussex. West Sussex have a MHS service, known as Pathfinder, whose contract expires at the same time. The procurement will use a single core service specification however there will be two separate place-based lots which will result in two separate contracts.

- 3.4.3. Leadership for the procurement is provided by a steering group jointly chaired by the NHS Sussex ICB Heads of Mental Health Commissioning in Brighton & Hove and West Sussex, with representation from agencies including NHS Sussex ICB, Brighton & Hove City Council, West Sussex County Council, and Possability People, a voluntary sector organisation who run a mental health Lived Experience Advisory Group in Brighton & Hove and West Sussex and bring a lived experience perspective to the steering group.
- 3.4.4. The annual budget for the new Brighton and Hove MHS service will be £1.837m which represents a reduction in funding of approximately 15%. Both the ICB and the council are reducing their contribution. The annual BHCC contribution will be £0.27m per annum funded from the Public Health ring fenced grant (see Table 1 below). This equates to a BHCC expenditure of £1.89m over the lifetime of the seven-year contract.
- 3.4.5. The budget for this service is reducing against a backdrop of increasing need. Through working in a more integrated way with primary care and secondary mental health services, the service can provide a more targeted and joined up offer with reduced potential duplication. The community engagement and development element will strengthen support to people at lower intensity of need with the intention of reducing need for specialist services, and targeting support more effectively.

<b>Proposed budget</b>	<b>Per year</b>	<b>Over seven years</b>
<b>NHS Sussex ICB</b>	£1,567,316	£10,971,212
<b>BHCC</b>	£270,000	£1,890,000
<b>TOTAL expenditure</b>	£1,837,316	£12,861,212

**Table 1: Proposed annual budget for MHS Service**

- 3.4.5 BHCC and NHS Sussex ICB will both be joint parties to the contract and each will hold contract management responsibilities.

### **3.5. New community mental health support services for adults**

- 3.5.1 The new MHS service has a single aim: to improve the mental health and wellbeing of the adult population. It has a range of principles (Appendix 2) that include a commitment to:
- Address health inequalities through increasing access and improving outcomes for those with protected characteristics and for populations at higher risk of developing mental ill health.
  - Embed co-production into the service model by collaborating with people and communities who use services.
  - Deliver an accessible and person-centred service
  - Ensure the service offer is evidence based, trauma informed, innovative and flexible.
  - Focus on promotion & prevention to promote wellbeing, prevent escalation of distress and intervene early.
- 3.5.2 The new service will have the following characteristics:

- Flexible and dynamic to ensure it responds to the changing environment and changing needs within the communities.
- Outcomes led and with a strong focus on communities of interest including but not limited to: black and racial minority communities, people aged 18 to 25, adults with experience of the care system, neuro-divergent people, LGBTQ+ communities, refugees, asylum seekers and vulnerable migrants, Gypsy, Roma and Traveler communities, carers, people who misuse drugs and alcohol and people who are homeless.
- Voice of the local community and those who use services will be integral to service development and delivery
- More systematic and meaningful collection of data and intelligence including mental health outcomes and service user experience

3.5.3 The MHS service will be delivered through Neighbourhood Mental Health Teams (NMHTs). This model of delivery integrates working between the MHS service, Sussex Partnership NHS Foundation Trust, primary care, social care, and the local community. It also aims to ensure people are linked in with wider community support services where needed for example drug and alcohol treatment services and housing services.

3.5.4 The NMHTs model is a component of the Sussex Integrated Care System's long-term improvement aim to develop Integrated Community Teams across the city.

3.5.5 Key elements of the new MHS service are outlined below. The BHCC funding will be primarily focused on the third strand:

- Advice Information and Guidance: This will act as the central point of information and access to the MHS Service, the NMHTs and wider community support services. It will include opportunities for drop-in and outreach access.
- Getting Support: Will deliver a range of interventions that relieve stress, promote resilience, sustain wellbeing and prevent deterioration in mental health. This will include a wide range of group and 1 to 1 psychosocial support, specialist support for people with severe mental illness including employment support and physical health checks
- Community Development and Engagement, Promotion and Prevention: It will deliver several elements including an asset-based approach to strengthening community voice; increasing influence; and identifying and addressing challenges related to improving mental health and wellbeing and preventing suicide.

#### **4. Analysis and consideration of alternative options**

##### **4.1 Option 1 – invest jointly into MHS Service with NHS Sussex ICB (preferred)**

4.1.1 The joint approach supports the Sussex Integrated Care System strategy and the commitment the Local Authority has made as one of the lead partners to the strategy. The strategy has a strong focus on joined up working across partners to improve services for the local population,

maximise benefits that joint commissioning can bring to improve health & care outcomes, reduce inequalities and improve value for money.

- 4.1.2 The service will help address the high and growing levels of mental health need in the city and supports the delivery of priorities identified by communities through the BHCC led community insight programme.
- 4.1.3 A joint contract with ICB and BHCC as parties with the service provider builds on existing positive partnership working and creates opportunity to maximize outcomes through an integrated approach. This can deliver value for money by avoiding duplication. In addition, the ICB will be taking over the legal and financial responsibility of the new contract, freeing up capacity of BHCC staff. This is the preferred option.

#### **4.2 Option 2 – MHS services are commissioned separately by NHS Sussex ICB and BHCC**

- 4.2.1 This will help address the high and growing levels of mental health need in the city and reduce inequalities but won't have the same reach as a jointly commissioned integrated service.
- 4.2.2 If separate contracts are put in place, there will be duplication of administrative costs and potential duplication of service provision and reporting, increased demand on BHCC staffing capacity and the need for additional liaison between council and NHS Sussex ICB. This may also impact on the funding available for delivery of the service compared to administration of the service.
- 4.2.3 This option entails the same contract expenditure as option 1 but requires additional officer time to administer and brings no additional benefits. It is not recommended.

#### **4.3 Option 3 – do not invest in the service**

- 4.3.1 Not investing in the MHS Service would risk the Council failing its public health duty to improve the health of its local population, as well as Council commitments to improve mental health and wellbeing for residents in Brighton & Hove, as identified through previous community insight work and engagement with local health forums.
- 4.3.2 It would reduce council capacity to meet priorities, recommendations and actions identified in key city and council plans and strategies.
- 4.3.3 Overall, this option would weaken the local preventative approach to improving population wellbeing and reducing health inequalities in the city and would lead to greater demand and greater cost pressure across the system. It is not recommended.

### **5. Community engagement and consultation**

- 5.1 The following engagement and consultation activities have shaped the MHS service proposal:
- 5.2 A thematic review was conducted of over 50 engagement and consultation activities both nationally and locally. This approach was taken based on feedback from the city's mental health Lived Experience Advisory Group, that findings from recent engagements and consultations be used rather than approaching communities with similar consultation questions again.
- 5.3 A pre-market engagement event took place on 6 March 2024 with over 100 attendees from over 50 local organisations across Brighton & Hove and West Sussex.
- 5.4 A Request for Information (RFI) went to the market in July 2024 to gather views about the proposed model. Over 40 responses were received.
- 5.5 BHCC community engagement and insight programme recently ran health forums with communities in the city, with three out of four forums raising mental health as a key issue.
- 5.6 The lead Cabinet Member for Adult Social Care, Public Health and Service Transformation Councillor Burden, the chair of the Health & Wellbeing board Councillor De Oliveira and the mental health policy lead Councillor Czolack were consulted on 23<sup>rd</sup> August 2024.

## **6. Financial implications**

- 6.1 This report indicates that the financial commitment from BHCC for the Community Mental Health Support Services for Adult programme is currently £409k per year. The new proposed budget for the whole programme is reduced, and the amount that BHCC will contribute annually from October 2025 will reduce to £270k for the next 5 years with optional 2 years. The £270k is earmarked to come from the ring-fenced Public Health budget which will not have an impact on the BHCC general fund at this time. However, if public health funding were to cease or reduce in the future within the duration of the contract, then the outstanding contractual obligations link to the programme could then fall on the BHCC general fund. This would result in an unplanned expenditure, which could affect the overall expenditure of BHCC

Name of finance officer consulted: Jamiu Ibraheem      Date consulted (23/08/24):

## **7. Legal implications**

- 7.1 The MHS services outlined in this report include health care services which fall under the scope of The Health Care Services (Provider Selection Regime) Regulations 2023. The services must therefore be procured in accordance with these regulations. The Council's Contract Standing Orders will also apply. As indicated in the report, as the procurement is being led by



NHS Sussex ICB, the procurement documentation will be monitored by Orbis Procurement to ensure compliance with the Contract Standing Orders.

Name of lawyer consulted: Sian Stevens      Date consulted (28/08/24):

## **8. Equalities implications**

- 8.1 The new MHS service aims to improve the mental wellbeing of the adult population and includes engaging with and supporting adults in the city at higher risk of mental ill health and suicide. The specification is underpinned by the national evidence base, and an analysis of data including protected characteristics data. The national and local intelligence identified that many of those who experience higher risk of mental ill health and suicide have protected characteristics and many of the risk factors that are associated with mental ill health and suicidal ideation are more common in those with protected characteristics. The new service commits to providing tailored, targeted support to these groups and will therefore have a positive impact on equalities.
- 8.2 For joint commissioning contracts with NHS Sussex ICB, the NHS Equality and Health Inequalities Impact Assessments online form is completed which assesses impact on protected characteristic groups, social inclusion groups (e.g., carers, homeless people) as well as those living in areas of deprivation or rurality.<sup>6</sup> NHS Sussex ICB incorporated the data and evidence used for the service specification into this assessment, which was reviewed by their Equalities Team and approved by ICB Commissioning Group in November 2023
- 8.3 The findings of the Equality and Health Inequalities Impact Assessment were that the new service would have a positive impact on local communities by enabling more equitable and fair access to MHS services, particularly for adults that belong to one or more protected characteristic groups
- 8.4 The Equalities Impact Assessment will be included within the tender documents, and the provider of the new service will be required to collate Equalities Monitoring for all service provision which will be regularly reviewed at contract review meetings.

## **9. Sustainability implications**

- 9.1 The Brighton & Hove Sustainability Implications checklist identified 3 areas as potential positive impacts of this procurement.
- 9.2 Sustainable transport: MHS Service will be delivered flexibly with both online and in-person services. The provider will be expected to ensure local activities will be accessible by sustainable travel options such as walking, cycling and public transport.

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<sup>6</sup> [Equality and Health Inequality Impact Assessments \(EHIA\)s - Sussex Health & Care \(ics.nhs.uk\)](https://www.ics.nhs.uk/equality-and-health-inequality-impact-assessments-ehias/)

- 9.3 Sustainable procurement: The provider will be expected to put in place environmental sustainability policies and can raise any environmental concerns, feedback or improvement opportunities during performance review meetings.
- 9.4 Health, safety, wellbeing and local communities: The new service will work towards reducing the impact of mental ill health in communities, and therefore promoting a healthy environment to live and work in.
- 9.5 In addition, the provider of the new service will be required to demonstrate how they will reduce emissions and air pollution, commit to circular economy principles and reduce consumption and waste.

## **10. Health and Wellbeing Implications:**

- 10.1 The new service aims to improve the mental health and wellbeing of adults and includes a focus on increasing access for those who are at greater risk of mental ill health and suicide and includes a focus on more disadvantaged communities.
- 10.2 People with mental health problems are often more disadvantaged and have poorer health outcomes. The service, by improving mental health and wellbeing can reduce unfair differences in health. One of the key principles proposed in the new services is addressing inequalities.
- 10.3 No negative health and wellbeing impacts were identified.

## **Other Implications**

## **11. Procurement implications**

- 11.1 NHS Sussex ICB are leading on the procurement. Due to the nature of the services required, the proposed approach is a competitive process under Health Care Services (Provider Selection Regime) Regulations 2023. NHS Sussex ICB completed a Procurement Strategy Document which details the process and was reviewed by the steering group.
- 11.2 Bids will be evaluated against the required Key Criteria of: Quality & Innovation; Value; Integration, collaboration and service sustainability; Improving access, reducing health inequalities, and facilitating choice; Social Value.
- 11.3 When bids are evaluated, Social Value will make up 15% of the evaluation scoring - 10% to be applied to social value and 5% to sustainability. Potential providers will be required to show how they will support social value by supporting staff and volunteers, smaller local voluntary sector providers, and their plans for community organization and engagement.
- 11.4 Since NHS Sussex ICB are leading on the procurement, this matter has not been presented to the Council's Procurement Leads meeting. The procurement documentation will have oversight from Orbis Procurement

(acting on behalf of BHCC) to ensure compliant with Contract Standing Orders.

## **12. Crime & disorder implications:**

- 12.1 There are no crime and disorder implications

## **13. Conclusion**

- 13.1 Preventative MHS services for adults are currently delivered by a network of local voluntary and community sector organisations. They offer a wide range of support options for those with mental health problems and their families and carers.
- 13.2 The city has high and growing mental health need and re-procurement of these preventative services can improve mental health and wellbeing outcomes, reduce demand for more specialist services and reduce inequalities.
- 13.3 The proposed service will support the city's five population health priorities, delivery of outcomes in the Council Plan, and delivery of key strategic documents including the Brighton and Hove Joint Health & Wellbeing Strategy.
- 13.4 A jointly commissioned service builds on existing positive partnership working and creates opportunity to maximize outcomes through an integrated approach.
- 13.5 We are seeking Cabinet delegation to enter into a procurement process, led by the NHS Sussex ICB, to procure MHS services and to enter into the awarded contract for seven years.

## **Supporting Documentation**

### **1. Appendices**

1. Appendix 1 – List of providers in the current service
2. Appendix 2 - Mental health Support Service aims and principles

### **2. Background documents**

1. Sussex Integrated Care System strategy Improving Lives Together [Our strategy - Sussex Health & Care \(ics.nhs.uk\)](https://www.sussexhsc.nhs.uk/our-strategy).



## **Appendix 1: List of providers in the current UOK service**

**The current UOK service is described here: <https://www.uok.org.uk/>**

The providers that deliver the services are shown below. Southdown is the lead provider.

Allsorts Youth Project  
Brighton Women's Centre  
Cruse Bereavement Support  
Fabrica  
Friends, Families and Travellers  
Grassroots Suicide Prevention  
Mind Brighton & Hove  
MindOut  
Money Advice Plus  
Rethink Mental Illness  
Southdown  
Switchboard  
The Clare Project  
The Trust for Developing Communities  
The Hangleton and Knoll Project  
YMCA Downslink Group



## Appendix 1 – Aims and principles of the new Mental Health Support Service

*The MHSS will be expected to work towards delivering the following aim:*

MHSS will improve the mental health and wellbeing of the adult population.

### 4.2 Principles

*The MHSS will be expected to adopt the following principles that describe how the services are delivered. Delivery of the MHSS will be monitored and measured with Key Performance Indicators (KPIs) linked to the overall aim and principles.*

1. **Addressing health inequalities.** MHSS will have an emphasis on increasing access and improving outcomes for, those with protected characteristics ([Protected characteristics | EHRC \(equalityhumanrights.com\)](https://equalityhumanrights.com)) and for populations at higher risk of developing mental ill health.
  - a. MHSS will be based on inclusivity, particularly for people with coexisting needs, learning disabilities and those with the highest levels of complexity and who experience marginalisation.
  - b. MHSS will work within the local health and care systems to address health inequalities and social determinants of mental ill health.
  - c. MHSS will promote population mental health and wellbeing, prevent ill health, and reduce stigma and discrimination towards people experiencing mental ill health.
2. **Co-production.** MHSS will be co-produced in partnership with people who use services and their friends and family carers. They will be co-produced with people who are representative of the communities they serve.
3. **Accessible and person-centred.** MHSS will take account of the whole person recognising their health and social needs and their roles as a parent, carer, worker, student, friend, and family member.
  - a. MHSS will be easily accessible for Individuals, friends, families and carers.
  - b. MHSS will improve the lives of people living with, experiencing and recovering from mental ill health.
4. **Partnership and neighbourhoods.** MHSS will be integrated and joined up with other support services, working as part of the NHMT model and aligned with neighbourhood Integrated Community Teams (ICT).
  - a. MHSS will be seamlessly delivered and maximise continuity of care.
5. **Evidence based.** MHSS interventions will be based on best practice, population need, what works, what is cost effective and what data and people tell us.
6. **Trauma-informed.** MHSS will be delivered in a psychologically and trauma informed way.
7. **Innovation.** MHSS will be delivered flexibly with innovation in service delivery to provide value for money and meet local need.
8. **Promotion & Prevention.** MHSS will prevent escalation of distress, reduce risk of suicide and self-harm with a focus on engaging with and ensuring support for populations that may be at higher risk of harm.





# Brighton & Hove City Council

## Cabinet

## Agenda Item 68

**Subject:** Public Health Community Nursing Services

**Date of meeting:** 26<sup>th</sup> September 2024

**Report of:** Cabinet Member for Adult Social Care, Public Health and Service Transformation

**Contact Officer:** Name: Director Public Health

Tel: 01273 29

Email: [steve.hook@brightonhove.gov.uk](mailto:steve.hook@brightonhove.gov.uk)

[Sarah.Colombo@brighton-hove.gov.uk](mailto:Sarah.Colombo@brighton-hove.gov.uk)

**Wards affected:** All Wards;

**Key Decision:** Yes

**Reasons Key:** Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000 and is significant in terms of its effects on communities living or working in an area comprising two or more electoral divisions (wards).

**For general release**

### **1. Purpose of the report and policy context**

1.1 The report asks for agreement to re-procure the current Public Health Community Nursing (PHCN) contract for up to 5 years (3+2) from April 2025.

1.2 The PHCN contract comprises the city's Health Visiting and School Nursing services. This report details the rationale for decision to award a contract to the current local NHS Trust service provider under the new Provider Selection Regime made under the Health and Care Act 2022.

### **2. Recommendations**

2.1 Cabinet approves the direct award of the PHCN contract to Sussex Community NHS Foundation Trust for a period of up to five years (3+2yrs)

2.2 Cabinet agrees to delegate authority to the Corporate Director of Housing Care & Wellbeing to finalise the terms for the contract and award the contract for PHCN for a term of five years.

### **3. Context and background information**

#### **The Public Health Community Nursing Service**

- 3.1 The service is currently being delivered by Sussex Community NHS Foundation Trust (SCFT). It comprises a Health Visiting Service and a School Nurse service whose combined offer covers ages 0-19 yrs. The services are provided in line with the national [Healthy Child Programme](#) model with universal, targeted and specialist levels provided according to the needs of babies, children and families. Both services support multi-agency safeguarding casework.
- 3.2 Health Visitors are based in the city's Family Hubs and work closely with the wider early help system and with community midwifery to provide integrated support. They deliver [5 nationally mandated reviews](#) to all families with babies before their child reaches 2.5 years old and support with a range of health and wellbeing needs including infant feeding, child development and communication, safe sleeping, parent and child mental health.
- 3.3 The School Nurse team provides a named school nurse for every maintained, academy and free school in the city delivering a range of health and wellbeing support and advice to children and young people, parents and carers. In primary schools the School Nurse team delivers vision and hearing screening and the [National Child Measurement Programme](#)

#### **Provider Selection Regime**

- 3.4 The NHS Provider Selection Regime (PSR) which governs the procurement of healthcare services in England came into force on 1 January 2024, as part of regulations made under the Health and Care Act 2022. The PHCN service falls under the scope of the PSR and therefore must be re-commissioned in accordance with the PSR..
- 3.5 The PSR has a number of different routes to procuring services. Direct Award Process C is an available route which allows for the award of a service with the current service provider. Direct Award Process C can be used where the performance, contract value and service specification meet set requirements. The PHCN contract meets the criteria for the Direct Award Process C route. In April 2024 at the Council's Procurement Leads Meeting Councillors supported the proposal that the procurement should proceed under this route.

### **4. Analysis and consideration of alternative options**

#### **Option 1 Recommended**

- 4.1 Direct award the service with the existing provider, SCFT and the existing annual contract value of £5,359,192
- 4.2 The proposed contract meets the eligibility requirements of Direct

Award Process C in that the existing provider is satisfying the original contract terms and conditions and will satisfy the proposed new contract terms and conditions, and the services are not changing considerably. Performance measured against the nationally benchmarked mandated checks for health visiting shows strong performance and better than regional and national performance.

- 4.3 Brighton & Hove performance against the suite of nationally benchmarked indicators is significantly better than England and the South east.  
The most recent data for 2023/24 shows continued improvement for Brighton & Hove across all 5 indicators.

Indicator	Brighton & Hove 23/24	Brighton & Hove 22-23	England 22-23	South East 22-23
New birth visit within 14 days	92.9%	91.6%	79.9%	82.6%
6-8 week review by 8 weeks	90.1%	89.6%	79.6%	84.2%
12 month review by 12 months	91.2%	88.8%	70.9%	74.6%
2-2.5 yr review	86.8%	81.2%	73.6%	76.3%
Totally or partially breastfed at 6-8 weeks	74.5%	71.3%	49.2%	No data

- 4.4 Both the Health Visiting and School Nursing services scored highly in terms of satisfaction in Public Health patient surveys of each service. See Appendix 2 for survey results
- 4.5 Continuing the service with this local NHS Trust further embeds social value providing quality employment and excellent integration with specialist and community health services and with the Council's Family Hubs programme and children's safeguarding.

## Option 2

- 4.6 Direct Award the service to the existing provider with a reduction in contract value.
- 4.7 Given that a high proportion of the costs are NHS clinical staff salaries any reduction in contract value will be reflected in a reduced service offer.
- 4.8 The Local Authority is required to commission the [5 nationally mandated reviews](#) therefore any reduction in contract value would need to be accounted

for by a commensurate reduction in contract activity above and beyond the mandated reviews. (See paragraph 8.3 for more details of this activity).

- 4.9 These services provide high quality early help and preventative health care to families. This early intervention supports improved outcomes across health, education and wider life chances over the life course which in turn contributes to reductions in the costs of targeted and specialist services. Any reduction in this contract activity is highly likely to impact negatively on children and family health and wellbeing now and in the future.

### **Option 3**

- 4.10 A competitive procurement process under the Provider Selection Regime
- 4.11 The current provider consistently delivers excellent performance; good integration with specialist health and Family Hubs services; is a local provider delivering high quality employment and has Care Quality Commission inspection 'Good.'
- 4.12 There is no significant market for these services as the majority of Healthy Child Programme services nationwide are provided by local NHS Trusts. Locally the West Sussex service is provided by SCFT also and the service is being re-procured under the Provider Selection Regime with the same timetable as the Brighton and Hove Service. In East Sussex the service is provided by East Sussex Healthcare NHS Trust.
- 4.13 The timescales to undertake a competitive tender process will necessitate an extension to the current contract for 6 months from April 2025 and will entail significant additional work for what is likely to be little additional benefit.
- 4.13 A high proportion of the service costs are NHS salaries which means the opportunity to secure greater value for money via a competitive tender is extremely limited as these salaries are negotiated nationally. In addition the service requires appropriately qualified staff in order to deliver safe and effective healthcare.

## **5. Community engagement and consultation**

- 5.1 Engagement has taken place with key stakeholders to inform re-commissioning of the service
- 5.2 Public Health worked with stakeholders and set up a steering group to agree the scope of a needs assessment and to develop and deliver two patient surveys for Health Visiting and School Nursing service users. Both the needs assessment and the surveys will inform the refreshed specification for the service from April 2025.
- 5.3 The stakeholder group included, Amaze, PaCC, Friends Families & Travellers, Brightpip, Mothers Uncovered, Maternity Voices Partnership, Trust for Developing Communities, Impact Initiatives, Health watch along

with council early years and school support services and the Provider service leads. This ensured a range of local voices, including those who may be seldom heard, informed the decision making on what evidence would inform the service specification going forward.

- 5.4 The surveys were delivered via the Health Visiting and School Nursing services and stakeholder groups and by the Maternity Voices Partnership for Brighton and Hove  
Health Visiting Service - 70% of respondents were very or fairly satisfied with the health visiting service (1,064 responses)  
School Nursing - 79% with primary school nurse support and 92% of secondary school nurse support. (47 responses)  
(See Appendix 2 for a more detailed analysis of the survey returns).
- 5.5 The needs assessment captures local, regional and national evidence about what works to deliver high quality accessible 0-19 yrs Healthy Child Programme services. Commissioned research in Sussex to gather the voices of fathers and non-birthing parents form an integral part of the evidence base alongside maternity voices of Gypsy Roma and Traveller parents gathered in Sussex by Friends Families & Travellers.

## **6. Financial implications**

- 6.1 This report indicates the need to re-procure the current Public Health Community Nursing (PHCN) contract which ends on March 25 for another 5 years from April 2025. The current value of the contract is £5,359m, which is been funded by a Public Health grant. By going for option 1, which is the recommended option, the value of the new contract remains the same as the previous contract and with the same provider. There is no financial implication as the contract value has already been budgeted for within the Public Health grant.

Name of finance officer consulted: Jamiu Ibraheem Date consulted (03/09/24)

## **7. Legal implications**

- 7.1 The Council has a duty under section 12 of the Health and Social Care Act 2012 to take such steps as it considers appropriate for improving the health of the people in its area. The re-commissioning of the healthcare services detailed in this report must comply with The Health Care Services (Provider Selection Regime) Regulations 2023 (the "2023 Regulations"). This report recommends award of the contract for the service via Direct Award Process C under regulation 9 of the 2023 Regulations. This process may be used if the existing contract is due to expire, the Council proposes a new contract with the existing provider and is of the view that it is satisfying the existing contract and will likely satisfy the proposed new contract to a sufficient standard. This process gives the Council flexibility to award a contract without competition where there is unlikely to be overall better value in selecting a new provider. The recommendations in this report are in

keeping with the 2023 regulations and the existing provider meets the requirements of Direct Award Process C.

- 7.2 The Council's Contract Standing Orders will also apply.

Name of lawyer consulted: Sian Stevens

Date consulted (03/09/24):

## **8. Equalities implications**

- 8.1 The recommended option in the paper to Cabinet is to sustain the current contract value which means if that is agreed there is no expectation that the service delivery will disproportionately impact on service users with protected characteristics.
- 8.2 If the decision is to re-commission at a contract value below the current annual value there is a risk of disproportionate impact on those with protected characteristics. The Local Authority is mandated to deliver the 5 health visiting reviews and these are delivered within a wider range of support and care with an enhanced offer for those families with additional needs.
- 8.3 Any reductions in service delivery as a result of a lower contract value would likely be required from activity outside the [5 nationally mandated reviews](#). These comprise support for children with special education needs & disabilities and their parents and carers, perinatal mental health support to birthing people and partners, school nurse capacity to support all schools and/or safeguarding work and for both services a potential reduction in face to face appointments

## **9. Sustainability implications**

- 9.1 The current provider Sussex Community NHS Foundation Trust (SCFT) has a Green Plan in place as required under the [Health and Care Act 2022](#) and the requirements laid out in [Greener NHS » Delivering a net zero NHS \(england.nhs.uk\)](#).
- 9.2 The SCFT [Green Plan - Care Without Carbon 2021](#) encompasses all the areas in the Brighton & Hove Sustainability Implications checklist including targets for reducing emissions, active travel, Personal Protective Equipment, procurement, staff wellbeing.

## **10. Health and Wellbeing Implications:**

- 10.1 Public Health Community Nursing provides a key health service to babies, children, young people and families in the city. The Brighton & Hove service follows the [Healthy Child Programme](#) which is a proven model for delivering early help to families that prevents ill health and supports life-long health and wellbeing. The recommended proposal provides for continuity of a well evidenced quality service with excellent performance that meets the needs of families in Brighton and Hove.

## **Other Implications**

### **11. Procurement implications**

- 11.1 The proposed procurement route is compliant with The Health Care Services (Provider Selection Regime) Regulations 2023, which is the legislation that governs the award of contracts for this type of service. The existing provider has passed all of the selection criteria required for the contract and the key criteria for service delivery have been assessed by officers.
- 11.2 Should the recommendations of this report be agreed by Cabinet, a public notice of intention to award will be published and the contract awarded following a mandatory standstill period.
- 11.3 The contract provider is a locally based NHS trust delivering high quality care with qualified practitioners delivered in local communities alongside the Council's Family Hubs programme and in the city's schools and colleges. The Service evidences excellent relationships with partners in the Community & Voluntary Sector, specialist health services and council services working with children young people and families.
- 11.4 As an NHS employer it provides high quality employment and evidences an effective educator programme supporting training into Specialist Community Public Health Nurse roles and progression to more senior specialist roles.
- 11.5 The Trust's Green Plan includes commitments to improve the health and wellbeing of people involved in the Trust's supply chain, improving the wellbeing of staff and a range of targets such as reducing the carbon footprint of staff journeys,

### **12. Crime & disorder implications:**

- 12.1 The Health Visiting and School Nursing teams provide a universal service and are therefore a key service in identifying needs early and timely signposting of families to support. Both services also provide health expertise in safeguarding processes led by the children's social work service.
- 12.2 The School Nursing service in supporting pupil and student wellbeing contributes to more children and young people staying in school and college which is a protective factor in relation to criminal and sexual exploitation of children and young people. This service also works closely with the Drug Alcohol and Sexual Health team within Ru-ok? the Council's Children and Young People's Substance Use and Sexual Health Service, providing joint drop in sessions in secondary schools.

### **13. Conclusion**

- 13.1 Health Visiting and School Nursing are core health services for families

in the city. They are provided by a local NHS Trust with excellent benchmarked performance and strong integration with local services and communities.

- 13.2 Health Visiting and School Nursing provide essential prevention health services that reduce health inequalities and improve health and wellbeing and wider outcomes across the life course; any reduction in the contract value will impact negatively on families who need an enhanced offer.
- 13.3 The service must be re-procured using the Provider Selection Regime and the quality of the existing provider and eligibility make a direct award the best option to ensure continuity and quality of service.
- 13.4 This paper therefore seeks Cabinet approval for the direct award for the PHCN contract for up to 5 years (3 +2yrs) from 2025-2030.

## **Supporting Documentation**

### **Appendices**

- 1. Appendix 1 Outline of the Health Visiting and School Nursing services with performance data
- 2. Appendix 2 Health Visiting and School Nursing patient survey headlines



# Appendix 1

## Public Health Community Nursing Contract Re-procurement

Cabinet September 26th 2024

### 1. Health Visiting and School Nursing

The Public Health Community Nursing (PHCN) contract comprises the delivery of Health Visiting and School Nursing services in the city and is delivered by Sussex Community NHS Foundation Trust (SCFT).

Health Visiting and School Nursing offer four levels of service;

- Community
- Universal provided to all families
- Targeted for those families who require some additional support
- Specialist for those families with complex needs

### 2. Health Visiting

All families receive the [5 reviews](#) recommended by the national [Healthy Child Programme](#) which are mandatory for Local Authorities to commission comprising;

- Antenatal
- New Birth visit
- 6-8 week
- 1 Year Review
- 2 Year Review

The service provides advice and support across a wide range of 0-5 yrs child and parent needs including mental health, infant feeding, weaning, sleep issues and signposting and referral to specialist health services.

In addition the Healthy Futures Team provides enhanced support for parents and families with additional needs such as young parents, refugee and asylum seeker families, parents being supported by children's social work and families from Gypsy Roma and Traveller communities.

The service employs a specialist health visitor lead for maternal and infant mental health and one for infant feeding. It has achieved Stage 2 of the UNICEF [Baby Friendly Standards](#) for breast and infant feeding and is working towards Stage 3 in 2024.

### 3. School Nursing

The School Nurse team provides health and wellbeing support to pupils in school and to parents and carers including advice and support on mental health, sleep, sexual health, routine illnesses and signposting and referral to specialist health services. The team also makes an offer to families which children and young people who are not in

school via the Council's Access to Education team. In primary schools the team provides a combined programme of Vision and Hearing Screening and the [The National Child Measurement Programme - NHS \(www.nhs.uk\)](http://www.nhs.uk) at Reception and Year 6.

The team works closely with education providers, the Council's Personal Social Health Economic Advisory Team for schools, the Drug Alcohol and Sexual Health team within Ru-OK?, the Public Health Schools programme, the Sexual Health and Contraception service and SCFT's Immunisations team which delivers in school immunisations. SCFT commissions the local Community and Voluntary Sector Youth Collective to deliver 1:1 youth work support to young people referred from the School Nurse team.

#### 4. Contract Performance

The provider has consistently met or exceeded national and regional performance against the suite of benchmarked indicators for the Healthy Child Programme throughout the period of the contract. The service has recovered well from the pandemic and rapidly returned to face to face delivery alongside an enhanced digital offer. Parents have greater choice to request a virtual appointment and the service prioritises face to face delivery of reviews with an emphasis on ensuring safeguarding.

#### 5. Key performance figures

Brighton & Hove performance against the suite of nationally benchmarked indicators is significantly better than England and the South east.

The most recent data 2023/24 shows continued improvement for Brighton & Hove across all 5 indicators.

Indicator	Brighton & Hove 23/24	Brighton & Hove 22-23	England 22-23	South East 22-23
New birth visit within 14 days	92.9%	91.6%	79.9%	82.6%
6-8 week review by 8 weeks	90.1%	89.6%	79.6%	84.2%
12 month review by 12 months	91.2%	88.8%	70.9%	74.6%
2-2.5 yr review	86.8%	81.2%	73.6%	76.3%
Totally or partially breastfed at 6-8 weeks	74.5%	71.3%	49.2%	No data

## Appendix 2

Public Health Community Nursing Contract Re-procurement

Cabinet September 26th 2024

### Health Visiting and School Nursing Patient Survey Analysis 2023

The surveys were delivered via the Health Visiting and School Nursing services and stakeholder groups and by the Maternity Voices Partnership for Brighton and Hove.

Respondents: Health Visiting survey 1,064 responses School Nursing survey 47 responses

### Headlines Results

70% of users were satisfied overall with the service. Satisfaction varied with the mode of contact they had, with those who had face to face contact with health visitors having the highest levels of satisfaction (77%), compared with those who had contact by phone or video call (56%).

There is also high levels of satisfaction with how services are delivered, with nearly 4 out of 5 respondents saying they were satisfied. Those who had contact by video call had the lowest levels of satisfaction.

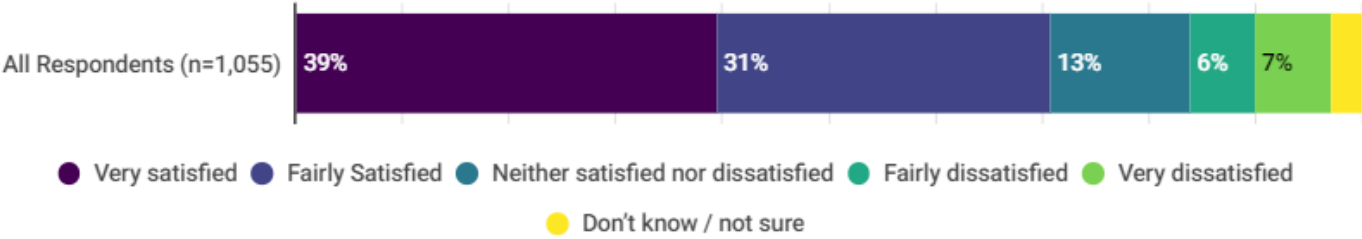
When asked about the reasons for satisfaction or dissatisfaction, the health visitor being kind and supportive was the most common theme identified for those who were satisfied, whilst those who were dissatisfied most often said there was not enough contact.

74% thought the service was helpful at providing information, and 74% also thought the service was helpful at providing reassurance.

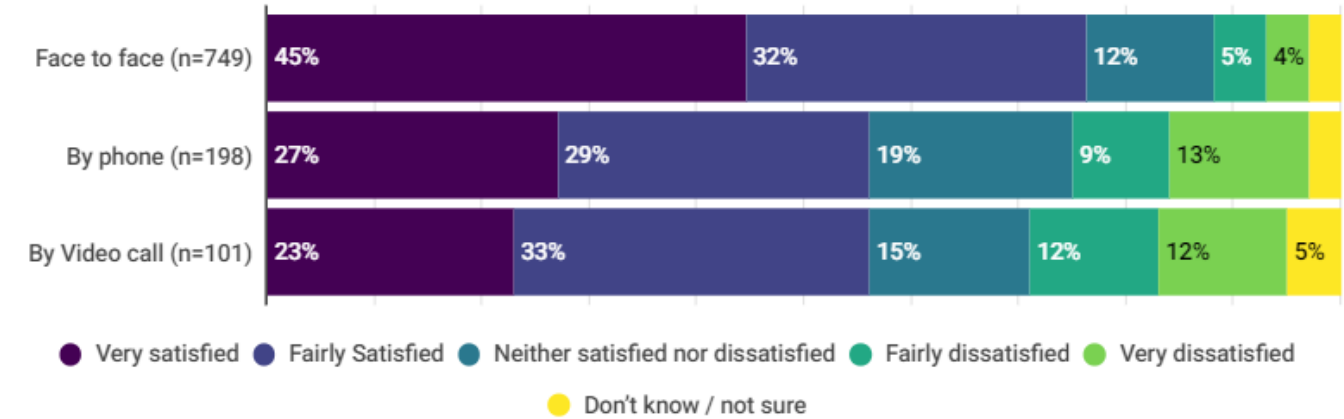
The most helpful support provided was breastfeeding (41%), followed by sleep (22%) and infant feeding (21%).

3 out of 5 respondents said it was fairly or very easy to contact the service. When asked to provide a reason, the top theme identified for those who were satisfied was quick phone calls back. At the same time, the most common theme for those who were dissatisfied was difficulty getting through on the phone and a slow response.

Overall Levels of Satisfaction with how the Health Visiting Service is delivered



Satisfaction by type of contact



There are high levels of overall satisfaction with the health visiting service. More than two thirds of respondents (70%) are very or fairly satisfied with the Health Visiting service. One in eight (13%, 138 people) are fairly or very dissatisfied.

Overall levels of satisfaction with the Health Visiting service varies by the type of contact with the service.

Respondents who had face to face contact were most likely to be satisfied, with nearly four out of five (77%) doing so, including nearly a half (45%) who are very satisfied.

However, satisfaction is lower for contact by phone (56%) and contact by video call (56%).

More than a fifth of respondents who had contact by phone (22%, 43 people) and nearly a quarter who had contact by video call (24%, 24 people) were fairly or very dissatisfied with how the Health Visiting service was delivered.

## Overall Levels of Satisfaction with how the School Nursing Service is delivered

### Headline Results

The majority of respondents felt that the school nursing service is both helpful at providing reassurance and at providing information. This was seen across all education phases.

Parents and carers of primary school aged children felt that the most helpful services provided were support in the context of the child's disability, and help with bedwetting / daytime wetting. At secondary school age, respondents felt support with anxiety, mental health and well being, and support in the context of the child's disability were the most helpful. This was similar for sixth form / college parents and carers, with the addition of referrals to specialist services.

There are high levels of overall satisfaction with the school nursing service at primary school level (79%), secondary school level (92%), and sixth form / colleges (100%).

Most respondents said the service was very or fairly easy to contact at all education phases, with the highest proportion seen in parents and carers of sixth form / college aged children (88%), followed by secondary aged children (85%), and then primary school aged children (72%).

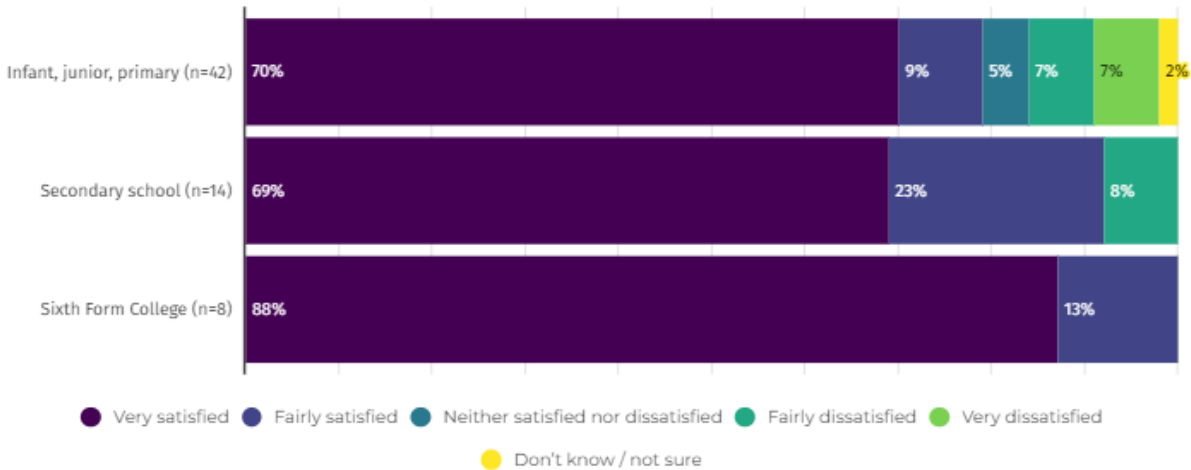
Whether respondents agreed that their child told them when the service was available at school varied depending on the education phase.

When asked how the service could be improved, the most common response said that there was nothing to improve, followed by more availability at school.

The most common themes identified when asked what the service does well was that there was informative advice, the school nurse was helpful, and that they did well at facilitating referrals with other healthcare professionals.

The majority of respondents said they did not access the service during the pandemic, but for those that did, most said that the service continued to be provided at a good standard.

Overall Levels of Satisfaction with how the School Nursing Service is delivered



There are high levels of overall satisfaction with the School Nursing service.

Four out of five respondents or more are very or fairly satisfied with the School Nursing service. Satisfaction is high in all education phases: infant, junior and primary schools (79%, 34 people), secondary schools (92%, 12 people) and sixth forms / colleges (100%, 8 people).

Only 6 respondents (14%) of a child at an infant, junior or primary school and 8% of parents and carers with a child in secondary school are fairly or very dissatisfied with the School Nursing service.

# Brighton & Hove City Council

## Cabinet

## Agenda Item 69

**Subject:** Procurement of Cleaning Services for Adult Social Care & Housing

**Date of meeting:** Thursday 26 September 2024

**Report of:** Cabinet Member for Adult Social Care

**Contact Officer:** Name: Steve Hook, Acting Corporate Director – Housing Care & Wellbeing (Care & Wellbeing Lead)

Name: Anne Richardson-Locke, Head of Commissioning, Housing Care & Wellbeing

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**Ward(s) affected:** All

**Key Decision:** Yes

**Reason(s) Key:** Expenditure which is, or the making of savings which are, significant having regard to the expenditure of the City Council's budget, namely above £1,000,000.

**For general release**

### **1. Purpose of the report and policy context**

- 1.1. The report seeks delegated authority to conduct a procurement exercise and award contract/s for the provision of cleaning services across Housing and Adult Social Care. The Council has a duty to support vulnerable people in the city and by providing de-clutter, deep clean and regular cleaning services people will be supported to maintain a safe and clean environment.
- 1.2. Currently teams across Adult Social Care and Housing regularly spot purchase cleaning services from a number of different organisations. As the need continues to grow, a procurement exercise is now required to ensure the services provide value for money and meet the required standards. This is an opportunity to combine the separate arrangements from two service areas within the newly formed Housing, Care & Wellbeing directorate into a combined contract/s.
- 1.3. This service aligns with all four of the Council Plan outcomes and further detail is set out in 3.3 below.

### **2. Recommendations**

- 2.1. Cabinet agrees to the procurement and award of a contract/s for a period of three years with options to extend for a further two years for the provision of cleaning services for vulnerable residents and grants delegated authority to

the Corporate Director Housing Care & Wellbeing to procure and award the contract/s.

- 2.2. Cabinet grants delegated authority to the Corporate Director Housing Care & Wellbeing to agree the optional extension of the contract/s referred to in 2.1 subject to satisfactory performance.

### 3. Context and background information

- 3.1. Under the Care Act 2014 local authorities have a statutory duty to meet the care and support needs of adults who meet the eligibility criteria under Section 13 of the Care Act. Most people in receipt of Adult Social Care funded services are able to do their own cleaning or receive help from a care or support provider or unpaid carer. In some circumstances, however, a person's property may become neglected due to a period of ill health, either mental or physical, or due to personal reasons such as use of drugs and/or alcohol. The growth of hoarding has increased significantly since the Covid 19 pandemic and properties can become unsafe due to the volumes and nature of the items hoarded.
- 3.2. The Housing Tenancy Sustainment service provide support to highly vulnerable residents living in Council homes. This team work with a range of services to enable residents to live safely in their homes. There has been a significant increase in the number of residents with complex support needs impacting on their ability to manage their home and tenancy. This includes a need for the removal and disposal of items from properties and gardens, including hoarded items, household rubbish, bio-hazardous waste and then for a deep clean of the premises. Similar service needs exist for residents living in Temporary & Supported accommodation.
- 3.3. The proposed services will align with all of the Council Plan outcomes:
  - 3.3.1. **Outcome 1: A city to be proud of.** *Our goal is to deliver an accessible, clean, and sustainable environment that we can all be proud of.* The Service Provider will be required to work in a sustainable way and support some of our most vulnerable residents to maintain a clean and safe environment.
  - 3.3.2. **Outcome 2: A fair and inclusive city.** *Homes for everyone.* The services will contribute to our commitment to provide improved housing support, prevent homelessness by helping people to main their tenancies and is part of our investment in building and fire safety.
  - 3.3.3. **Outcome 3: A healthy city where people thrive:** *Living and ageing well: Enable people to live healthy, happy, and fulfilling lives & Ensure there is safe, effective, sustainable, and high-quality health and care provision in the city.* The services will promote independence and better health and wellbeing and will perform a vital role in monitoring the person using the services and their environment for signs of deterioration in mental or physical health.
  - 3.3.4. **Outcome 4: A responsive council puts the needs of its customers – residents, local businesses and visitors – at the heart of everything it does.** Feedback from users of the current services and people who refer to them indicate that there is a need for greater professionalism,



more sensitivity to the needs of vulnerable people and an ability to manage increasing demand and save money.

- 3.4. The estimated cost of the annual spend for the new contract/s is £0.500m. This is based on last year's spend but assuming some growth in demand that will be managed with a more efficient, value for money service. In 2023/24 Adult Social Care and Housing spent £0.500m on domestic cleaning services (£0.367m ASC, £0.133m Housing). This was a 15% overall increase on the previous year and the average monthly spend for this financial year indicates the spend will be similar.
- 3.5. Last year Adult Social Care purchased regular cleaning services for 61 people and just over 50% of the remaining spend was to supply ad hoc cleans or deep cleans for 91 people. The Housing spend was primarily on declutter and deep cleans (91 jobs), with 77 declutter jobs and 32 deep cleans.
- 3.6. Engagement with the local market is ongoing in terms of capacity and specialisms, and due consideration will be given to creating Lots in order to reduce any barriers to the involvement of small or medium size enterprises (SMEs) in the process. This may result in the awarding of more than one contract and the decision as to how to run the tender will be made at the procurement stage.
- 3.7. The identified benefits for this procurement activity include:
  - 3.7.1. A transparent pricing structure that provides consistency and value for money across the different departments.
  - 3.7.2. A simplified referral process and payment process and the end to individual quotations and multiple invoices.
  - 3.7.3. Robust Key Performance Indicators (KPIs), contract monitoring meetings and spot checks to ensure adherence to the contract.
- 3.8. The new service(s) will comprise of:
  - 3.8.1. **Declutter Service.** This service will be required when a property is deemed as unsafe due to hoarding. The property will be restored to a standard that promotes safety, health and wellbeing, and prevents loss of accommodation and homelessness. This may also include the clearance of outside areas around the property, especially access routes.
  - 3.8.2. **Deep Clean Service.** This service will deep clean a property that has become a risk to the health of the occupier(s). Any unsafe substances will be removed and the property cleaned to a high standard.
  - 3.8.3. **Regular Cleaning.** People referred to the regular cleaning service are likely to be vulnerable clients whose accommodation has previously become neglected. The service will help them to maintain clean, safe, settled accommodation and reduce the risk of homelessness or street-dwelling.
  - 3.8.4. **Ad-Hoc Cleaning** Ad-Hoc Cleaning will provide a high standard of cleaning on a 'one-off' basis as a way of restoring a person's accommodation to a standard that promotes safety, health, and wellbeing. This may be required when assistance is needed to prepare

or bring the premises up to an acceptable standard but after that the person is able to continue maintaining the premises independently, for example after a short period of mental or physical ill health.

- 3.9. People in need of these services are expected predominantly to be resident in Council properties or other social housing, but some people may be living in other tenures including owner occupation.
- 3.10. Families, Children and Learning (FCL) Directorate very occasionally use cleaning services and have also expressed an interest in using the new service(s).
- 3.11. The specification will provide the relevant detail on the client base, service specifics, plus set out clear criteria for social value and sustainability. There will also be expectations in regard to sensitivity of staff when managing hoarded goods and cleaning and disposing of items. Staff will be expected to be respectful, non-judgemental and avoid negative and devaluing language and behaviours.
- 3.12. If authority is granted a tender will be issued in November, with evaluations in January and contract/s awarded in April 2025.

#### **4. Analysis and consideration of alternative options**

- 4.1. The option of continuing with the current arrangement is not recommended. The current spot purchase arrangements do not take maximum advantage of the benefits a competitive tendering exercise would bring including the likely resulting value for money and quality standard outcomes.
- 4.2. Consideration was given to separate contracts for Adult Social Care and Housing but combining them results in larger volumes and will ensure better value for money and economies of scale for the successful organisation/s. It is also a good opportunity to provide joined-up services which are of benefit to the Council, the provider and the people using the services.

#### **5. Community engagement and consultation**

- 5.1. Engagement was carried out with the teams who work with the people who are in receipt of the cleaning services. Key themes of the feedback were that the service will need to:
  - 5.1.1. Proactively work with people to encourage independence whilst being sensitive to their individual circumstances.
  - 5.1.2. Provide a consistent service to people and be persistent with people who may be very hard to reach.
  - 5.1.3. Provide support for the cleaning staff who may witness and work in difficult circumstances.
  - 5.1.4. Work alongside other specialist services such as hoarding, pest control and waste clearance.
  - 5.1.5. Provide feedback to Council Officers where they are unable to reach people to provide the service, if they have any concerns about a person or their family or if they observe a change in physical or mental health.

## **6. Financial implications**

- 6.1. The spend on cleaning, decluttering and removal costs within Housing HRA, Housing General Fund and Adult Social Care services are largely responsive in nature. For example, there may be a case of abandonment from a temporary accommodation property. Budgets for this type of work are not always identified separately and may be part of responsive repairs budgets, removals and storage budgets and other rubbish clearance budgets. The advantages of the new contract/s are outlined in paragraph 3.7 and should enable the service to obtain better value for money than just purchasing on an ad-hoc basis, given the contract will be for the whole of HCW. This could assist the service to reduce costs accordingly. This will be monitored through the monthly Targeted Budget Monitoring (TBM) Process.

Name of finance officer consulted: Monica Brooks

Date consulted: 28/08/24

## **7. Legal implications**

- 7.1 The Council is required to comply the Procurement Act 2023 in relation to the procurement and award of contracts above the relevant financial thresholds for services, supplies and works. The Council's Contract Standing Orders (CSOs) will also apply.

Name of lawyer consulted: Siobhan Fry

Date consulted: 22/08/24

## **8. Equalities implications**

- 8.1. An Equalities Impact Assessment (EIA) is being completed for this commission. There is not enough data collected on people who currently use the services to indicate any disproportionate impact on any protected characteristics or groups. The EIA has, however, identified potential barriers to the service:
- Some people who use the service have limited literacy skills or language barriers.
  - Cultural or religious beliefs may mean that people have specific requirements about how and when cleaning services are provided.
  - The majority of people using the service will have intersecting needs, often with a mental health need in addition to a disability and may have experienced homelessness, domestic violence, are care experienced or living with addiction. There may be a reluctance to or fear of accepting services.
- 8.2. To address these barriers, it is important to gather better equalities data and engage with people who use the service to gather feedback essential to understand and address any negative impacts. Processes and documents need to be accessible and staff must receive equalities training to ensure they are sensitive to a range of different needs and work in a person-centred, and trauma-informed way. These requirements are set out in the service specification and suppliers will be expected to evidence how they will comply in their bids.

## **9. Sustainability implications**

- 9.1. The procurement process will require interested parties to demonstrate how they will support the Council's work to reduce carbon emissions and become a carbon neutral city by 2030. The successful Service Provider/s must embed circular economy principles throughout the service offering and review this on an ongoing basis to improve performance.
- 9.2. Sustainability will form part of the evaluation of tender submissions, and a minimum of 10% of the overall quality score.

## **10. Health and wellbeing implications**

- 10.1. The proposed plan and investment will have a strong alignment with the Council Plan Outcome 3: A healthy city where people thrive. For further detail see 3.3.3 above.

## **11. Procurement implications**

- 11.1. A competitive procurement exercise compliant with the new Procurement Act (2023) (replacing the Public Contract Regulations (2015)) will satisfy the requirements of our Contract Standing Orders and provide an opportunity to bring several services under contract. Market engagement will involve local suppliers, and give due consideration to SMEs. The finalised contract structure will be focused on best meeting the needs of those using the services and will drive value for money, environmental sustainability and Social Value outcomes in line with Council priorities.

Name of Procurement specialist consulted: Andrew Phillips

Date consulted: 19/08/24:

## **12. Social value and community wealth building considerations**

- 12.1. Social value benefits will form part of the evaluation of bids for the contract/s in line with the council's Social Value Framework, providing 10% of the total quality score.
- 12.2. At all stages of the commissioning process Brighton and Hove City Council will work in line with The Social Value Act 2012 and consider the economic, social, and environmental improvements from which the local area can benefit. Providers will need to demonstrate how they will achieve or exceed the requirements specified by Brighton and Hove City Council.
- 12.3. Providers will be asked to provide evidence of how the service will maximise social value and impact on local priorities and meet the following outcomes:
  - 12.3.1. More local people in employment.
  - 12.3.2. Support equality, diversity, and inclusion for all people with protected characteristics.
  - 12.3.3. Enable people to live healthy, happy and fulfilling lives and live independently.

### **13. Crime and disorder implications**

- 13.1. There are no crime and disorder implications.

### **14. Conclusion**

- 14.1. The recommendation to Cabinet is to delegate authority to procure and award a de-clutter, deep clean and ongoing cleaning service/s as detailed in the report.
- 14.2. It is critical for both Adult Social Care and Housing services to be able to work with reliable companies to help deliver essential services to vulnerable residents in the city, with some living in council homes.
- 14.3. This new provision will assist the Council to enable residents to live independently and safely in their homes, whilst enabling us to fulfil our duties under the legislation referenced in the body of the report.

