

# People Overview & Scrutiny

Date: **8 October 2025**

Time: **4.00pm**

Venue **Hove Town Hall Council Chamber**

Members: **Councillors:** O'Quinn (Chair), Gauge (Deputy Chair), Cattell, Lyons, Mackey, McLeay, Parrott, Shanks, Sheard and Winder

## **Co-optees**

Lesley Hurst (Church of England diocesan representative), Maria Cowler (Catholic Church diocesan representative), Sara Fulford (Older People's Council), Joanna Martindale (Community Works Rep), Adam Muirhead (Community Works Rep), Becky Robinson (PaCC), Dr Anusree Biswas Sasidharan (Community Works), and Cassie Hoffman-Kazlauskas (Parent Governor Rep)

Contact: **Luke Proudfoot**  
Overview & Scrutiny Officer  
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# AGENDA

## PART ONE

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### 17 PROCEDURAL BUSINESS

(a) **Declaration of Substitutes:** Where Councillors are unable to attend a meeting, a substitute Member from the same Political Group may attend, speak and vote in their place for that meeting.

(b) **Declarations of Interest:**

(a) Disclosable pecuniary interests;

(b) Any other interests required to be registered under the local code;

(c) Any other general interest as a result of which a decision on the matter might reasonably be regarded as affecting you or a partner more than a majority of other people or businesses in the ward/s affected by the decision.

In each case, you need to declare:

(i) the item on the agenda the interest relates to;

(ii) the nature of the interest; and

(iii) whether it is a disclosable pecuniary interest or some other interest.

### 18 MINUTES

7 - 10

18.1 To agree the draft minutes of the 15 September 2025 People Overview & Scrutiny Committee meeting.

### 19 PUBLIC INVOLVEMENT

19.1 To consider the following items raised by members of the public: (a) Petitions: To receive any petitions presented by members of the public to the full Council or to the meeting itself; (b) Written Questions: To receive any questions submitted by the due date of 10am on the 29 September 2025; (c) Deputations: To receive any deputations submitted by the due date of 10am on the 29 September 2025.

### 20 MEMBER INVOLVEMENT

20.1 To consider the following matters raised by Members: (a) Petitions: To receive any petitions submitted to the full Council or to the meeting itself. (b) Written Questions: To receive any written questions from members. (c) Letters: To consider any letters submitted by Members. (d) Notices of Motion: To consider any Notices of Motion.

### 21 CHAIR'S COMMUNICATION

### 22 HOMELESSNESS AND ROUGH SLEEPING STRATEGY 2025 TO 2030

11 - 148

Contact Officer: Steve Morton

Ward Affected: All Wards

## **23 HOUSING HATE INCIDENT POLICY**

**149 - 232**

*Contact Officer: Justine Harris*  
*Ward Affected: All Wards*

*Tel: 01273 293772*

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For further details and general enquiries about this meeting contact Luke Proudfoot, (email [Luke.Proudfoot@brighton-hove.gov.uk](mailto:Luke.Proudfoot@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**

## **PEOPLE OVERVIEW & SCRUTINY**

**4.00pm 15 SEPTEMBER 2025**

**COUNCIL CHAMBER, HOVE TOWN HALL, NORTON ROAD, HOVE, BN3 3BQ - HTH/CC**

### **MINUTES**

**Present:** Councillor O'Quinn (Chair) Gauge (Deputy Chair), Cattell, McLeay, Parrott, Shanks, Winder, Guilmant and Meadows

**Other Members present:** Lesley Hurst (Church of England diocesan representative), Sara Fulford (Older People's Council), Adam Muirhead (Community Works Rep), Dr Anusree Biswas Sasidharan (Community Works Rep), Jasmine (Youth Council Rep), Jessica Sumner (Community Works Rep)

### **PART ONE**

#### **10 PROCEDURAL BUSINESS**

10 (A) Cllr Meadows substituting for Cllr Lyons. Cllr Guilmant for Cllr Sheard. Apologies from Joanna Martindale.

#### **11 MINUTES**

11.1 RESOLVED The draft minutes of the 8<sup>th</sup> July 2025 People Overview & Scrutiny Committee were approved.

#### **12 PUBLIC INVOLVEMENT**

12.1 Tenancy Policy – Lee Catt

Why is there not a vulnerability policy and/or strategy and a reasonable adjustment policy being used in line with the Spotlight report on attitude, respect, rights, and the vulnerability within social housing. If there is one, where is it, when was it published, why is it not easy to access, and why is it not being used in all cases?

Cllr O'Quinn gave the following answer: Thank you for your question. Having engaged with officers from housing I have received the following response:

We recognise the importance of ensuring that our housing services are inclusive, respectful, and responsive to the needs of residents, particularly those who are vulnerable. While there is currently no standalone Vulnerability Policy or Reasonable Adjustment Policy in place, I can confirm that work is actively underway to address this, as part of a wider programme of policy

development, which has so far included a new Anti-Social Behaviour Policy and Hate Incident Policy.

The Vulnerability Policy will set out our approach to adapting service provision to meet the individual needs of residents. It will be informed by equalities data and lived experience, and will reflect our commitment to:

- Recognising the unique experiences of each individual, and tailoring support accordingly.
- Collaborating across departments and with external agencies, including social services, health, education, and the voluntary sector.
- Using evidence-based approaches to guide decisions and interventions.

We are aiming to begin consultation with council tenants, leaseholders, residents in temporary accommodation and those accessing our Homelessness and Housing Options service early in the new year, to ensure the policy is co-produced and reflects the voices of those it is designed to support.

Mr Catt asked the following supplementary question: Will this include staff members of Brighton & Hove City Council who will also be approached and trained in respect of ASB victims? Because a lot of the policies are effective but it's the officers and individuals that are not upholding the policies and correct procedures.

Cllr O'Quinn responded that she would provide him with a written answer.

## **13 MEMBER INVOLVEMENT**

13.1 There was none.

## **14 CHAIR'S COMMUNICATION**

14.1 The Chair gave the following communication: Today we are beginning the process of scrutinising the council's budget, with an update from Cllr Jacob Taylor and officers on the council's financial situation. As set out in the report, it would be helpful if members could limit questions to remain within the remit of this committee. A similar report is going to the Place Overview & Scrutiny Committee where issues within their remit will be covered.

We will then be looking at the renewal of the Section 75 Agreement on mental health services between the council and Sussex Partnership NHS Foundation Trust.

Before we begin, I want to make members of the committee aware that the council is still in the pre-election period ahead of the Queen's Park Ward by-election on 18th September. Therefore, I would urge members of the committee and cabinet members presenting to us to refrain from making any comments which could be seen to encourage or discourage support for any party or candidate standing in the election.

## **15 GENERAL FUND BUDGET PLANNING & RESOURCE UPDATE - 2026-27 TO 2029-30**

15.1 Cllr Jacob Taylor gave a broad overview of the council's financial position. He said that the general fund was forecast to increase by £16m but that the levels of pressure faced by the council was also set to increase providing a budget gap. Cllr Taylor said that the pressures were mainly coming from service areas covered by the People committee and made clear that this increased pressure was not the fault of the service users. He talked on recent TBM reports, the fairer funding review and the possibility of thinking outside of the box on temporary accommodation with ideas such as bringing more in house. John Hooton, Interim Director for Property & Finance, spoke on working with other local authorities on children's places, investing in IT and digital to save money, and saving money on property.

15.2 Following the presentation Cllrs asked questions on the following issues: levels of reserves, school transport, temporary accommodation, SEND, fairer funding, business rates, work with the voluntary sector, use of s106 money, student landlords, instances of overpaying for social care, wider social care costs, LGR, 2<sup>nd</sup> home premium rates, EIAs, the need to consult with the voluntary sector early in the budget process.

15.3 Proposed Cllr Shanks seconded Cllr O'Quinn. **RESOLVED:**

People Overview & Scrutiny Committee recommend that the Cabinet Member for Finance & City Regeneration begin earlier discussion with the voluntary sector on budget recommendations, ideally by December.

15.4 **RESOLVED:**

People Overview & Scrutiny Committee agreed to note the report.

## **16 MENTAL HEALTH SERVICES S75 AGREEMENT**

16.1 Cllr Jacob Allen, Steve Hook (Director of Adult Social Care), Richard D'Souza (General Manager), and John Child (Chief Operating Officer at Sussex Partnership NHS Foundation Trust) presented to the committee. The main points were an explanation of what s75 agreements are, the agreement between Brighton & Hove City Council & Sussex Partnership NHS Foundation Trust, the aims & objectives, the challenges & benefits of such agreements, and the proposal to renew the current agreement for a further three years.

16.2 Following the presentation Cllrs asked question on the following issues: Dementia beds in the city, why the item was coming to scrutiny now, if the number of staff was assessed as well as demand, lessons learnt on the current agreement, the proportion of people captured by equalities data (specifically race), if there was a children's services version of s75, the need for a proactive service, alternative options to a s75 agreement, move to neighbourhood mental health teams, how different strategies in the two organisations (such as VAWG strategy) feeds into s75 agreement, the idea of such an agreement for CAMHS, if drug addiction was an increasing issue.

16.3 **RESOLVED:**

People Overview & Scrutiny Committee agree to note the contents of the report including the recommendation to renew the s75 agreement for a further three years.

The meeting concluded at 18:53

Signed

Chair

Dated this

day of

# Brighton & Hove City Council

## Overview & Scrutiny

## Agenda Item

**Subject:** Homelessness and rough sleeping strategy 2025 to 2030

**Date of meeting:** 8 October 2025

**Report of:** Cabinet Member for Housing

**Contact Officer:** Name: Director of Housing People Services

Email: [harry.williams@brighton-hove.gov.uk](mailto:harry.williams@brighton-hove.gov.uk)

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

**Key Decision:** No

**For general release**

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

- 1.1 Under the Homelessness Act (2002) all housing authorities must have a homelessness strategy based on a review of all forms of homelessness in their district. The strategy must be renewed every 5 years. The council is currently consulting on a draft homelessness and rough sleeping strategy 2025 to 2030. This sets out proposals for preventing and reducing homelessness and for ensuring that sufficient accommodation and support are available for people who are at risk or those who become homeless. The draft strategy can be found at Appendix 1.
- 1.2 The strategy contributes to the delivery of Outcome 2 in the council plan: A fair and inclusive city. It is identified as an action in both the council plan and the housing strategy.

### 2. Recommendations

- 2.1 Overview & Scrutiny notes the findings of the review of homelessness 2025.
- 2.2 Overview & Scrutiny comments on proposed priorities and commitments set out in the draft homelessness and rough sleeping strategy 2025 to 2030.

### 3. Context and background information

- 3.1 There are an increasing number of people experiencing homelessness in Brighton & Hove. Analysis by Shelter in 2024 indicated that homelessness affects around 1 in 77 people in the city (3,580 people or 1.3% of the city's population). They estimated that at the end of June 2024 there were 3,528 people experiencing homelessness and living in temporary accommodation.

Trends in homelessness are set out in more detail in the review of homelessness 2025 at Appendix 2.

- 3.2 Shelter estimated that there were 1,411 homeless children in the city in June 2024: almost 40% of the total homeless population. This is confirmed by council data. Most of these children are living in temporary accommodation. At the end of 2024, 47% of households living in temporary accommodation contained children.
- 3.3 Rough sleeping is also rising in the city, reflecting national and regional trends. The rate of rough sleeping in Brighton & Hove was 30 per 100,000 population in March 2025, up from 20 per 100,000 in October 2020. Brighton & Hove has the joint 19th highest rate of rough sleeping in England.
- 3.4 More people are approaching our services with significant and often complex needs. Data from a recent audit of people with Multiple Compound Needs indicates that there were 704 people in contact with services who were experiencing homelessness with 2 or more other compounding needs (mental health, substance misuse, domestic violence, history of offending).
- 3.5 There are specific legal duties that the council, as the local housing authority, must comply with. This includes providing information and advice and preventing or relieving homelessness. If homelessness cannot be prevented the council may have a duty to help applicants find a settled home if they are eligible, have a priority need and other tests are met. There are other duties relating to homelessness, including the Duty to Refer, and responsibilities under the Children Act 1989, that also apply to the council's partners. There will also be some duties owed by adult social care in limited circumstances,
- 3.6 While people's homeless applications are being processed or while they are waiting to be rehoused, they may be placed in temporary accommodation. After falling between 2020 and 2022, the use of temporary accommodation by the council has again risen, with 1,928 households living in temporary accommodation at the end of 2024. We know from national evidence and local data, that living in temporary accommodation has adverse effects on people's health and wellbeing, employment, education and training, and other outcomes.
- 3.7 The cost of temporary accommodation is not sustainable with both rising prices and increasing demand. We anticipate a significant reduction in grant funding over the life of the strategy. To deliver the strategy with its planned shift to prevention, it must be financially sustainable in the short and medium term to deliver the desired long term benefits.
- 3.8 The draft strategy puts strong emphasis on partnership working with partners in the public, voluntary, community and social enterprise sectors involved in providing data and shaping the development of the strategy. Partnership with people with lived experience has also been a key element of strategy development and is embedded within the commitments which will underpin delivery.



- 3.9 The number of people who are homeless with high level or complex needs is increasing. This has informed the third priority area in the strategy 'Provide joined-up support with our partners to people who most need help'.
- 3.10 Due to the large number of children and young people affected by homelessness we have included a dedicated chapter addressing the impact of homelessness on children, families and young people. We have sought support from Public Health for an in-depth assessment to better understand the support needs of children, families and young people living in temporary accommodation.
- 3.11 Homelessness is rooted in structural inequalities and system wide challenges. Unemployment, disability, physical ill health, mental health needs, substance use, domestic abuse, and family breakdown create pathways into homelessness for many. The current cost of living crisis has intensified these pressures, while a chronic shortage of genuinely affordable housing means that even those in work can struggle.
- 3.12 The broader determinants of homelessness require comprehensive, coordinated responses that span multiple partners and levels intervention. The draft homelessness and rough sleeping strategy focuses on prevention and early intervention, temporary accommodation, and support for those in greatest need. Sustainable progress, however, depends on addressing the underlying causes of homelessness through a broader strategic lens. This includes actions set out in the housing strategy, the city plan, economic development strategy, the health and wellbeing strategy and more.
- 3.13 The proposed priorities for the homelessness and rough sleeping strategy 2025 to 2030 are to:
1. Increase our effectiveness in preventing homelessness and rough sleeping
    - 1.1 Early identification of risk and early intervention
    - 1.2 Support people to stay in their homes or to find a new home
    - 1.3 Deliver targeted prevention for people at risk of rough sleeping
  2. Improve temporary accommodation pathways and experiences
    - 2.1 Improve move on from temporary accommodation into settled housing
    - 2.2 Support people living in temporary accommodation
    - 2.3 Improve the supply and quality of temporary accommodation
  3. Provide joined-up support with our partners to people who most need help
    - 3.1 Target support for people who are most vulnerable
    - 3.2 Create integrated services for people with Multiple Compound Needs
    - 3.3 Support people experiencing rough sleeping to access services and accommodation

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

- 4.1 The development of a homelessness and rough sleeping strategy at least every 5 years is a legal responsibility for the council as the local housing authority. The Homelessness Code of Guidance for Local Authorities

indicates that housing authorities may collaborate to produce a joint housing strategy across a sub-regional area. This option was considered but not taken forward. However, the draft strategy does contain a commitment to work with national, regional and local partners to tackle the root causes of homelessness.

- 4.2 A new national homelessness strategy was announced by the incoming government in 2024, with an anticipated publication date to coincide with the 2025 Spending Review. In consultation with the Ministry for Housing Communities and Local Government we agreed to defer the city's homelessness and rough sleeping strategy with a view to incorporating new national priorities. At the point of writing this report, the national strategy has not been published and there is no indication when this will take place. If the national strategy is published in time, then consideration will be given to this in the final Brighton & Hove strategy.

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

- 5.1 Both the review of homelessness and the draft strategy have been developed with extensive engagement from statutory and voluntary, community and social enterprise partners. They have also been shaped by input from people with lived experience of homelessness.

- 5.1 Public consultation on the draft strategy runs from 8 September to 26 October 2025 with more information about how people can respond on the council's consultation website at [yourvoice.brighton-hove.gov.uk](https://yourvoice.brighton-hove.gov.uk). Findings will inform the final strategy with a consultation report published alongside it.

- 5.2 The consultation and communication plan is at Appendix 3

## **6. Financial implications**

- 6.1 The Homelessness and Rough Sleeping Strategy 2025 to 2030 indicates a robust and well-structured plan aimed at addressing the critical issue of homelessness.

- 6.2 The financial appraisal of the strategy reveals significant and increasing risks associated with shrinking budgets and diminishing resources. The strategy prioritises prevention and early intervention, as these represent the most cost-effective approaches. However, persistent pressures on temporary accommodation, including rising unit costs, limited supply, and extended stays, continue to drive up expenditure and put a strain on the Council's finances.

- 6.3 The overall funding environment is contracting. The Council's core budget remains static, while external grants from the Ministry of Housing, Communities and Local Government (MHCLG), namely the Homelessness Prevention Grant (HPG) and Rough Sleeping Prevention and Recovery Grant (RSPARG) are under threat. Notably, following a formal consultation on the HPG funding formula for 2026/27, Brighton & Hove City Council faces a potential reduction of approximately 45%, falling from £10.9 million in 2025/26 to around £6 million in

2026/27. Although transitional arrangements may partially cushion the impact, the reduction in grant income will still be considerable.

6.4 RSPARG allocations for 2025/26 are currently stable, but there is no confirmed funding for 2026/27. There is a real risk that RSPARG could be absorbed into HPG and subject to substantial cuts. New initiatives, such as a 'No First Night Out' model, would require decommissioning existing services or reallocating funds, as no new grant funding is expected. This poses a major financial risk.

6.5 Charitable and NHS contributions are also under financial pressure, which may further limit support and compound strain on Council services.

6.6 Short-term cost pressures impede progress towards prevention strategies, and reliance on expensive spot purchasing for temporary accommodation increases costs. Difficulties in moving individuals out of temporary accommodation result in further financial burdens. Proposals to reduce the use of costly placements, including relocating people outside the area, present practical and political challenges.

6.7 In summary, the financial context for the Homelessness and Rough Sleeping Strategy 2025–2030 is increasingly constrained, with declining funds and mounting risks. The combined effect of static Council budgets threatened external grants, and wider pressures on partners and charities is likely to result in significant negative financial implications for homelessness and rough sleeping services.

Name of finance officer consulted: Ferrise Hall      Date consulted:(04/09/2025):

## **7.      Legal implications**

7.1 Under the Homelessness Act (2002) all housing authorities must have a homelessness strategy based on a review of all forms of homelessness in their district. The strategy must be renewed every 5 years. The current strategy expires this year. Consultation is an essential part of any review.

Name of lawyer consulted: Simon Court      Date consulted (11 September 2025)

## **8.      Equalities implications**

8.1 An initial equality impact assessment has informed the review of homelessness 2025. Key issues are identified in the review in the sections 'Who experiences homelessness?' and 'Support needs of people experiencing homelessness'. The assessment has also informed the consultation and communication plan. A full equalities impact assessment will accompany the final strategy to council cabinet following consultation. The consultation findings will also be taken into account.

## **9.      Sustainability implications**

9.1 There are no immediate sustainability implications arising from this report.

## **10. Health and Wellbeing Implications:**

10.1 Poor health and disability can be a cause and consequence of homelessness. Data and evidence on health and homelessness in the city is included in the review of homelessness at Appendix 2 alongside summary information on healthcare services for people experiencing homelessness in the city. There is evidence from local Health Counts data and national research that living in temporary accommodation has a negative impact on both physical and mental health. People with multiple compound needs have significant health and care needs.

## **Other Implications**

### **11. Procurement implications**

11.1 There are no immediate procurement implications arising from this report.

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

12.1 The review of homelessness and draft strategy identify domestic abuse as a key cause of homelessness. Under the Domestic Abuse Act 2021 the council is required to set out its plans for accommodation for survivors of domestic abuse. It last did this in the Pan-Sussex Strategy for Domestic Abuse Accommodation and Support 2021-2024. The strategy was developed in partnership with the Sussex Police and Crime Commissioner, West Sussex County Council, East Sussex County Council. Work is currently underway to refresh the strategy.

12.2 Homelessness and rough sleeping are sometimes associated with begging and other forms of anti-social behaviour. While the strategy does not explicitly address these issues (being more appropriately matters for the Community Safety and Community Safety Strategy), it does make a commitment to challenge stigma, build trust and promote community integration and social connections. This is likely to have a positive impact on crime, disorder and community cohesion.

## **13. Conclusion**

13.1 Comments and feedback from members of the committee will inform the final strategy due for consideration by council Cabinet on 11 December 2025.

## **Supporting Documentation**

### **1. Appendices**

1. Draft homelessness and rough sleeping strategy 2025 to 2030
2. Review of homelessness and rough sleeping 2025

### 3. Consultation and communication plan





# Homelessness and rough sleeping strategy 2025 to 2030 Draft for consultation





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# Foreword

Brighton & Hove is an amazing city – vibrant, creative and inclusive. Our vision is for a better Brighton & Hove for all - a city we can all be proud of, somewhere that is fair and inclusive and a healthy place where people can thrive.

Last year we outlined our plans to deliver accessible, affordable and high-quality homes in Homes for Everyone, our housing strategy for 2024 to 2029. Sadly, not everyone in the city enjoys the benefits of a stable, safe and suitable home. We want to change that. Housing is a fundamental human right and homes for everyone is central to achieving our vision. This draft homelessness and rough sleeping strategy sets out our proposed priorities to tackle homelessness and rough sleeping over the next 5 years.

Homelessness can happen to anyone, but it disproportionately affects people who are already vulnerable: those who can't afford to pay the rent, people fleeing violence and abuse, and those evicted by their landlord or asked to leave by family or friends. The consequences can be devastating.

Our overarching priority is to stop people becoming homeless in the first place. The council and a whole range of other organisations can provide information, advice and support to help people stay put or find alternative accommodation.

If people do become homeless, the council can help them find a settled home, and in some cases offer temporary accommodation. However, too many people are spending too long in temporary accommodation, often in homes of a poorer quality. This is unacceptable and unsustainable. Our second priority, therefore, is to ensure that there is sufficient good quality temporary accommodation available; to support people while they are there; and to help them move on as quickly as possible.

Some people are more vulnerable when they become homeless or more likely to sleep rough. This includes children and young people, those fleeing domestic abuse, people with mental health needs, substance use issues, or a history of offending. Our third priority is to work with our partners to provide joined-up support for people who most need our help, with a long-term goal of ending rough sleeping in the city.

The input of people with lived experience of homelessness and our partners has helped shape this draft strategy. We have developed our proposed priorities and commitments together. We are deeply grateful to those who have contributed and look forward to your feedback in our public consultation.

## Introduction

Under the Homelessness Act (2002) all housing authorities must have a homelessness strategy based on a review of all forms of homelessness in their district. The strategy must be renewed every 5 years. This draft strategy for consultation sets out the council's plans for preventing and reducing homelessness and for ensuring that sufficient accommodation and support are available for people who are at risk or those who become homeless.

There is increasing demand for our services and there are specific legal duties that the council, as the local housing authority, must comply with. Currently we are spending too much on temporary accommodation and our resources are shrinking. We anticipate a significant reduction in funding over the life of the strategy. To deliver the strategy it must be financially sustainable.

Preventing and alleviating homelessness is a legal duty for the council. We will do everything we can to make sure that people are treated fairly and with respect when they approach us for help, whatever their housing situation. Everyone deserves our support, but we will prioritise those with greatest need and the most vulnerable. This includes support to access appropriate housing and to maintain independence and dignity.

Homelessness is rooted in structural inequalities and system wide challenges. Unemployment, disability, ill health, mental health needs, substance use, domestic abuse, and family breakdown create pathways into homelessness for many. The current cost of living crisis has intensified these pressures, while a chronic shortage of genuinely affordable housing means that

even those in work can struggle.

The structural determinants of homelessness require comprehensive, coordinated responses that span multiple policy areas and levels of government. This draft strategy focuses on prevention and early intervention, temporary accommodation, and support for those in greatest need. We recognise that sustainable progress depends on addressing the underlying causes of homelessness through a broader strategic lens. This includes the council plan, the housing strategy, the city plan, economic development strategy, health and wellbeing strategy and more.

While many determinants of homelessness lie beyond our direct control, we will use our voice to advocate for policy change at regional and national levels. This includes pressing for increased investment in social housing, reforms to the welfare system, improved discharge planning from institutions, and better funding for mental health and substance use services. We will work with the new Mayor for Sussex and Brighton, neighbouring local authorities, the Local Government Association, and other networks to amplify the case for addressing the root causes of homelessness.

## What our review of homelessness in the city tells us

Almost  
**3,600**  
people in  
Brighton & Hove  
experiencing  
homelessness  
June 2024



Around  
**1,400**  
children (0-17)  
experiencing  
homelessness  
June 2024



**76** people  
sleeping rough  
November 2024



**2,624**  
household  
approached council  
for homelessness  
advice and support  
in 2024



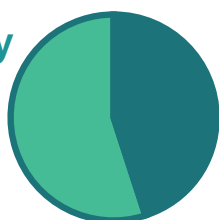
**2,366**  
homelessness  
applications  
in 2024



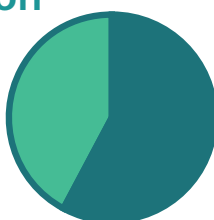
**31%**  
of homes in the  
city are privately  
rented  
(South East 17%;  
England 18%)



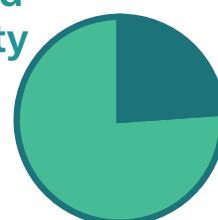
A private renter on  
an average income in  
Brighton & Hove can  
expect to spend  
**45%** of their  
household income on  
rent. The  
'affordability  
threshold'  
is 30%.



End of private  
rented tenancy  
reason for  
homelessness for  
**58%** of  
those owed  
a prevention  
duty



Family or friends  
no longer willing  
to accommodate  
reason for  
homelessness for  
**24%** of  
those owed  
a relief duty



**616**  
main housing  
duty acceptances  
in 2024



**7,500**  
households on  
waiting list for  
social housing



**3.3** years  
- average wait  
for socially  
rented home



**6.2** years  
– average wait  
for 3-bedroom  
socially rented  
home



**68%** of  
main applicants  
owed a relief  
duty have 1+  
support needs



**1,928** households in temporary  
accommodation

**22%** of  
households  
in temporary  
accommodation  
single male  
no children



**47%**  
of households  
in temporary  
accommodation have  
children



**21%**  
of households  
in temporary  
accommodation  
single female +  
children

**35%** of main applicants owed a relief duty have a history of mental health needs



**704** people experiencing homelessness with 2+ compounding needs (mental health, substance use, domestic abuse, history of offending)



Council homelessness services **£31.4** million in 2025/26 budget, of which £28 million for temporary accommodation



NHS specialist homeless healthcare services **£3.3** million



**110** voluntary, community and social enterprise organisations offering 204 specialist and support services



**2,220** volunteer hours per week



Voluntary, community and social enterprise sector estimated added value

**£10+** million



## Our vision and priorities

The council's vision is for a better Brighton & Hove for all. We want a city we can all be proud of, somewhere that is fair and inclusive, a safe and healthy place where people can thrive.

Our housing strategy Homes for Everyone, sets out our priorities for housing in the city. These are to improve housing quality, safety and sustainability; to deliver the homes our city needs; to promote improved health and wellbeing for all; to provide resident focused housing services; and to prevent homelessness and meet housing need

Our primary goal is to prevent homelessness. If a family or individual does become homeless, then their experience should be brief, and it should not recur. This draft strategy was developed with our partners and, most importantly, with the input of people with lived experience of homelessness. It draws on evidence from our review of homelessness in the city.

We propose 3 main priorities with 9 areas for focused action and a small number of targeted, strategic actions for each. We will continue to work to meet our legal responsibilities and to deliver and improve existing services. To ensure accountability, we will report on progress using the proposed indicators for each priority.

Our proposed priorities for the homelessness and rough sleeping strategy 2025 to 2030 are to:

### 1. Increase our effectiveness in preventing homelessness and rough sleeping

- 1.1 Early identification of risk and early intervention
- 1.2 Support people to stay in their homes or to find a new home
- 1.3 Deliver targeted prevention for people at risk of rough sleeping

### 2. Improve temporary accommodation pathways and experiences

- 2.1 Improve move on from temporary accommodation into settled housing
- 2.2 Support people living in temporary accommodation
- 2.3 Improve the supply and quality of temporary accommodation

### 3. Provide joined-up support with our partners to people who most need help

- 3.1 Target support for people who are most vulnerable
- 3.2 Create integrated services for people with Multiple Compound Needs
- 3.3 Support people experiencing rough sleeping to access services and accommodation

## Priority 1: Increase our effectiveness in preventing homelessness and rough sleeping

### Why this is important

Prevention is central to our strategy because it offers the best outcomes for individuals while making the most effective use of our resources. Homelessness can create lasting trauma, disrupt employment and education, and damage physical and mental health in ways that become increasingly difficult and expensive to address. By working with our partners, sharing information and using digital technologies we can get better at identifying who might be at risk and offer support before they reach crisis point.

Helping people to stay in their home prevents the trauma and cost of homelessness while preserving social connections and stability. Proactive landlord engagement, financial advice and support, and mediation services are some of the most cost-effective

interventions we can make. For those who need to leave their home, where attempts to stay have been unsuccessful or because it is unsuitable or unsafe, then support to find a new home is usually a better option than temporary accommodation.

Preventing rough sleeping is critical because it carries the greatest risk of harm and typically requires the most intensive and demanding interventions once people reach the streets. People leaving institutions, those with high support needs, and individuals with multiple compound needs are more likely to sleep rough. Targeted early intervention can break this cycle and prevent the deterioration in physical and mental health that makes future housing solutions more difficult to achieve.



## What we will do

### 1.1 Early identification of risk and early intervention

- Develop a homelessness risk model using data from a range of sources to identify and target support to people at greatest risk of becoming homeless before they reach crisis point.
- Work with universal public services such as Integrated Neighbourhood Teams, Family Hubs, schools, and foodbanks to identify and support individuals and families at risk of homelessness as early as possible.

### 1.2 Support people to stay in their homes or to find a new home

- Develop integrated tenancy sustainment services, bringing together housing, employment and skills, and financial inclusion partners to deliver coordinated support packages including income maximisation, debt advice, financial literacy training, and flexible crisis prevention funding.
- Improve access to alternative accommodation in the private and socially rented sectors for those who need to find a new home.
- Work with community, voluntary and faith organisations to develop targeted, culturally appropriate information and advice for people from Black and Racially Minoritised groups, including people seeking asylum and refugees, so they can access the support they need.

### 1.3 Targeted prevention for people at risk of rough sleeping

- Develop a financially sustainable 'no first night out' model to identify and support those who are known to services, including people in temporary or supported accommodation or leaving institutions and care settings, who are at greatest risk of going on to sleep rough.

## How we will measure progress

### We will track our progress using the following indicators:

- Number of Duty to Refer referrals
- % presenting at prevention duty stage
- % of duties owed where homelessness was prevented
- % of households placed in temporary accommodation
- Number of people sleeping rough on a single night

## Priority 2: Improve temporary accommodation pathways and experiences

### Why this is important

The number of households living in temporary and emergency accommodation has risen to unprecedented levels. Temporary accommodation is expensive, with costs rising over time. This impacts our ability to invest more in prevention. More importantly, it is insecure and may be unsuitable for people's specific needs long-term.

Too many people are spending too long in temporary accommodation. Children aged 0-17 make up around 40% of the city's homeless population, with most of them living in households in temporary accommodation. Extended stays in temporary accommodation can have a negative impact on children's educational attainment, social development, and mental health. For adults, the experience can worsen existing vulnerabilities and make it harder to find solutions and routes into settled accommodation. Living in temporary accommodation can disrupt support networks and community connections, especially where people are placed outside the city.

We recognise that while we need to prevent homelessness from occurring, we must also ensure that when people do need temporary accommodation, their experience is as positive as possible and that they move on to settled housing quickly. This requires us to reduce the overall numbers in temporary accommodation through effective prevention and reduce the length of time people spend in temporary accommodation through better pathways to settled housing.

Increasing the supply of good quality temporary accommodation reduces our dependence on more expensive forms of accommodation. Having an adequate supply also means we can better match households to appropriate accommodation types, ensuring people have suitable facilities and space. Finally, having sufficient supply reduces the pressure to place households out of area, helping maintain community connections and support networks.

## What we will do

### 2.1 Improve move on from temporary accommodation into settled housing

- Reduce our overall use of temporary accommodation by working with our supported and social housing partners to develop bespoke pathways into settled housing.
- Develop intensive, personalised move-on support to households in temporary accommodation, including assessment of barriers to move on, practical assistance with housing applications, financial support for deposits and removals, and tenancy sustainment support once in permanent housing.

### 2.2 Support people living in temporary accommodation

- Explore floating support services for people living in temporary accommodation to help them maintain community connections and social support networks and develop the skills and confidence needed for move on.
- Undertake a comprehensive needs assessment to better understand the needs and support requirements of households in temporary accommodation and inform service improvements.

### 2.3 Improve the supply and quality of temporary accommodation

- Put in place a recovery plan to address the short- and medium-term impact of rising temporary accommodation costs, a changing private rented sector market and expected loss of grant funding.
- Develop a comprehensive temporary accommodation acquisitions strategy to increase supply, raise standards and achieve long-term financial sustainability by retendering block booking contracts, introduce dynamic purchasing and reduce the use of spot purchasing.
- Strengthen accommodation supply by developing additional provision in partnership with private and social landlords and the voluntary, community and social enterprise sector.

## How we will measure progress

### We will track our progress using the following indicators:

- Total number of people in temporary accommodation
- Average length of stay in temporary accommodation
- Number of households with children in temporary accommodation
- Families with children in B&B over 6 weeks
- % of temporary accommodation spot purchased
- Successful move-ons per quarter

## Priority 3: Provide joined-up support with our partners to people who most need help

### Why this is important

There is a high demand for support and services from people in urgent housing need, including those fleeing domestic violence, vulnerable families, refugees and asylum seekers, LGBTQ+ youth, people with mental health needs, neurodivergent people and others. These factors often interact to amplify need and vulnerability. Our services are seeing increasing numbers of people with significant, and often complex, needs. In responding to those needs we will tailor our services to ensure fair access to good quality, people centred, and trauma informed support.

People who experience three or more of the following are described as having multiple compound needs: homelessness, mental health needs, substance use, current or past offending and domestic abuse. The term attempts to capture the way these issues combine to impact someone's life. Addressing multiple compound needs is a priority for our Health and Care Partnership. Together, we aim to jointly commission and deliver wraparound services for people with multiple compound needs.

Our ambition is to end rough sleeping in the city. People who sleep rough have often experienced serious, sometimes multiple traumas in their lives. The experience of rough sleeping itself is traumatic. Women and young people are at greater risk of victimisation and physical and sexual violence when sleeping rough. As well as preventing rough sleeping where we can, we will work with our partners to review and improve our accommodation and support offer for rough sleepers. This includes the development of our single homeless supported housing pathway, to better meet the needs of people with high levels of need.

## What we will do

### 3.1 Target support for people who are most vulnerable

- Establish multi-agency protocols for supporting priority groups including care leavers, 16–17-year-olds, pregnant women, families with children, domestic abuse survivors, refugees and asylum seekers, LGBTQ+ people and other vulnerable groups, ensuring coordinated assessment and support pathways.
- Develop a supported housing strategy and prepare for the anticipated changes to supported housing standards.
- Improve housing options and pathways for domestic abuse survivors, recognising their specific safety and support needs.

### 3.2 Create integrated services for people with multiple compound needs

- Improve the join up between the council's homelessness services and homeless healthcare services through a new Homeless and Multiple Compound Needs Partnership.
- Embed co-production approaches by working with people with lived experience to co-create innovative services, policies and practice improvements that reflect their expertise and priorities.
- Agree a care and support protocol for people with co-occurring mental health and substance use issues, which disproportionately affect people experiencing homelessness.
- Collaborate with our NHS and voluntary, community and social enterprise sector partners to take forward our shared ambition for a new integrated homeless healthcare hub.

### 3.3 Support people experiencing rough sleeping access services and accommodation

- Review and recommission our Housing First service to improve outcomes for residents and ensure a better distribution of Housing First tenancies across a range of housing stock.
- Provide enhanced support for those who return to rough sleeping, using data to track flow and target prevention work.
- Review and improve homeless day centre provision in the city to ensure that it meets a broader range of needs and is financially sustainable.
- Develop our housing offer and support services for those experiencing long term rough sleeping.
- Work with our partners to pilot a new multidisciplinary in-reach support approach to inform the development of the wider single homeless supported housing pathway.

## How we will measure progress

### We will track our progress using the following indicators:

- Households with accommodation secured at end of prevention/relief duty for households also experiencing at least two areas of overlapping disadvantage
- Number of households unable to be supported at domestic abuse safe accommodation due to being unable to meet additional needs.
- Percentage of people with multiple compound needs achieving positive outcomes across at least 3 domains (housing, health, criminal justice, substance use) at 12 months
- Number of people sleeping rough over the month who are long term

## Tackling homelessness in children, families and young people

Children (0-17) comprise around 17% of the population of Brighton & Hove but make up almost 40% of the city's homeless population. Most are part of families living in temporary accommodation. Families with children make up 42% of those seeking help from the council because they are at risk of homelessness, 19% of those owed a relief duty and 42% of those owed a main duty. National evidence tells us that outcomes for children living in temporary accommodation are significantly worse than for those in settled accommodation.

Young people aged 18-25 comprise around 14% of the city's population and approximately 20% of the homeless population. National and local data tell us that youth homelessness is increasing. Young people face distinct and often overlooked challenges that put them at greater risk of homelessness - from family breakdown, trauma and care experience, to lower pay, reduced benefit entitlements and limited access to safe housing. They are also more vulnerable if they do become homeless.

In developing this draft strategy, we have listened to feedback from our partners and other stakeholders and have included a dedicated chapter on children, families and young people. We want to ensure that the challenges facing children, families, and young people experiencing homelessness are explicitly addressed. We are seeking views on actions which will transform outcomes for some of the city's most vulnerable children and young people. We have suggested some areas below where we think we could make the most difference.

### **Priority 1: Increase our effectiveness in preventing homelessness and rough sleeping**

- Increase early identification of children, families and young people at risk of homelessness through early help and universal services such as schools and Family Hubs.
- Develop our family intervention and mediation services to prevent homelessness.
- Deliver targeted prevention for young people at risk of rough sleeping.

### **Priority 2: Improve temporary accommodation pathways and experiences**

- Support children, families and young people maintain connections to services and support networks.
- Improve standards for children and families living in temporary accommodation.
- Minimise the use of B&B, other forms of non-self-contained accommodation and out-of-area placements for families with children.
- Develop tailored pathways for vulnerable young people that meet distinct needs and experiences.

### **Priority 3: Provide joined-up support with our partners to people who most need help**

- Ensure that children, families and young people experiencing homelessness receive coordinated protection and support.
- Support care experienced young people and other vulnerable young people to sustain their tenancies.
- Strengthen our support offer for the most vulnerable children and young people.

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

We will track progress using the following measures:

- Number of households with children in temporary accommodation
- Number of families in B&B over 6 weeks
- Percentage of care leavers in suitable accommodation

# Our commitments

Our strategy is an ambitious, 5-year plan and is intended to contribute to delivering our long term vision of a better Brighton & Hove for all and our goal of homes for everyone. We know that we can't deliver it on our own.

Many of the factors that cause homelessness are outside our direct control. To achieve real change, we will need to collaborate with government, with regional and local partners and with people with lived experience of homelessness.

We are doing this in a context where demand for support is increasing and where resources are becoming scarcer. We need to manage our finances effectively and use data and evidence intelligently, targeting our interventions where they will have greatest impact.

We need a compassionate, skilled and knowledgeable workforce to deliver inclusive, person-centred services.

## To deliver our strategy, we commit to:

### 1. Be fair and inclusive

- a. Develop holistic, person-centred and trauma informed services
- b. Champion equality, diversity and inclusion
- c. Challenge stigma, build trust, and promote community integration and social connections

### 2. Work in partnership

- a. With people with lived experience to jointly design services and policy
- b. With government, regional and local partners to tackle the root causes of homelessness
- c. With the voluntary, community and social enterprise sector to bring additional resources and expertise to deliver the aims of the strategy

### 3. Make best use of our resources

- a. Ensure our workforce has the support, knowledge and skills to do their very best
- b. Manage our financial resources and assets to ensure best value and financial sustainability
- c. Use our information to better understand need, deliver evidence-based solutions and drive innovation



## Delivering the strategy

The council is embedding a learning framework to support our journey to become a learning organisation. We will use this framework to underpin the delivery of our strategy.



### Be connected

We are committed to work with our partners, including people with lived experience, to design services and support for people at risk or who are experiencing homelessness. We also recognise that partnership across the broader system will help us tackle the structural determinants of homelessness.

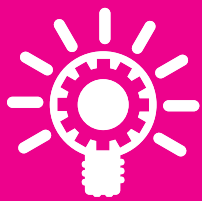
Together with our partners, we will put in place governance arrangements to ensure oversight and delivery of the strategy. As well as an annual action plan to accompany the final strategy, more detail on delivery will be set out in our service and operational plans. We will work with our partners and with people with lived experience to develop these. We will report on progress and update the action plan annually.



### Be confident

We face significant challenges. The cost of meeting our legal duty to provide temporary accommodation continues to rise rapidly. We allocated £28 million to meet the cost of temporary accommodation in 2025/26. It is likely that we will significantly overspend this by the end of the year. Due to a change in the funding formula for the Homelessness Prevention Grant we also expect that over the life of the strategy we will lose grant funding from central government.

All this means that we must do things differently. We know that we need to shift our approach to focus more on prevention and early intervention. Over the long term, we are confident that this will improve outcomes for people and reduce the cost of temporary accommodation to the council. In the short to medium term, however, we need to make some difficult decisions, including how and where we source our temporary accommodation.



### **Be innovative and creative**

Our financial position means that we need to think creatively with our partners about how we pool resources, integrate services and develop innovative solutions. We need to invest in our collective workforce to ensure that they have the skills and knowledge that is needed. We also need to make best use of our buildings and other physical assets across the city and develop a plan to ensure these are used to greatest effect. We will continue to develop our joint commissioning arrangement to ensure integrated, multi-agency, wrap-around support to people experiencing homelessness.



### **Be diverse and inclusive**

In reviewing homelessness and developing our priorities, the unequal impact of homelessness on some groups and individuals is striking. Our attention has been drawn to factors such as age, sex, ethnicity, sexuality, gender identity, disability and more. What is equally striking is that while these factors can help us understand risk, none of them alone can help us predict who is likely to become homeless or the impact of homelessness on their lives.

We need to get better at understanding how these and other characteristics interact in different contexts to develop interventions and services that recognise the diversity of experiences and needs, challenge stigma and promote inclusion. We believe that the best way to do this is by working in partnership with people with lived experience of homelessness.



### **Be healthy and psychologically safe**

The impact of homelessness on health and wellbeing is clear from the evidence we have gathered. Poor health is also a factor that can contribute to someone becoming homeless. Changes in national policy will give us more leverage to tackle poor housing conditions in both the private and social rented sectors. We also plan to work with our providers across sectors to drive up standards in temporary accommodation.

The interaction between homelessness and mental health is one of the most significant issues that we have identified. Many individuals who become homeless have a history of traumatic experiences prior to losing their homes. These can include childhood abuse, neglect, domestic abuse, or significant life crises such as the death of a loved one or financial hardship. The trauma of homelessness compounds these earlier experiences. In delivering this strategy, we have committed to work in ways that are trauma informed and psychologically safe.













# Review of homelessness in Brighton & Hove 2025





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## Introduction

Much has changed since the last homelessness and rough sleeping review for Brighton & Hove was undertaken in 2019, including the Covid-19 pandemic, a rapid rise in the cost-of-living, and a housing crisis that has intensified over time. In 2023 a new city council was elected which put ‘homes for everyone’ at the centre of its vision for a better Brighton & Hove for all.

Analysis by Shelter in 2024 indicated that homelessness affects around 1 in 77 people in Brighton & Hove (3,580 people or 1.3% of the city’s population).<sup>1</sup> They estimated that at the end of June 2024 there were 3,528 people homeless and living in temporary accommodation and a further 52 people sleeping rough. They also estimated that there were 1,411 homeless children in the city at that point: almost 40% of the total homeless population. Most of these children are living in temporary accommodation. At the end of 2024, 47% of households in temporary accommodation contained children.

Homelessness applications have been rising since 2021. In 2024, 2,624 households approached the council for homelessness advice and support either because they were at risk of homelessness or because they were homeless. Of these 2,366 made a homeless application. The number of households approaching the council after they had already become homeless also rose from 993 in 2021 to 1,230 in 2024.

If homelessness cannot be prevented the council may have an on-going duty to help applicants find a settled home if they are eligible, have a priority need and other tests are met. This is called the main housing duty. Those with priority need include pregnant women, families with children, and those who are homeless because of domestic abuse or due to an emergency such as a fire or flood or who are vulnerable in other ways. Households accepted as owed a duty under the main housing duty have more than doubled over the last 5 years with 616 acceptances in 2024 compared to 261 in 2020.

While people’s homeless applications are being processed or while they are waiting to be rehoused, they may be placed in temporary accommodation. After falling between 2020 and 2022, the use of temporary accommodation by the council has again risen, with 1,928 households living in temporary accommodation at the end of 2024.

Rough sleeping is also rising. The rate of rough sleeping in Brighton & Hove was 20 per 100,000 population in October 2020. The rate in March 2025 was 30 per 100,000. Brighton & Hove has the joint 19<sup>th</sup> highest rate of rough sleeping in England.

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<sup>1</sup> Shelter, 2024, At least 354,000 people homeless in England today, [https://england.shelter.org.uk/media/press\\_release/at\\_least\\_354000\\_people\\_homeless\\_in\\_england\\_today](https://england.shelter.org.uk/media/press_release/at_least_354000_people_homeless_in_england_today)

Data from a recent audit of people with Multiple Compound Needs indicates that there were 704 people in contact with services who were experiencing homelessness with 2 or more other compounding needs (mental health, substance misuse, domestic violence, history of offending).

The review of homelessness in Brighton & Hove is part of developing a new homelessness and rough sleeping strategy for the next 5 years. It aims to give a picture of homelessness in the city and identifies some of the issues and challenges the new strategy will need to address.

The review considers:

- the national and local context
- current levels of homelessness in the city and future estimates
- existing activities to prevent homelessness, secure accommodation for those experiencing homelessness and to provide support to households experiencing or at risk of homelessness
- the resources available to the council and other organisations to address homelessness

The review draws on quantitative information on homelessness collected by the council and its partners. Data cited is from the 5 calendar years from 1 January 2020 to 31 December 2024 unless otherwise stated. Figures for 2020, and to some extent 2021, are likely to have been skewed by the impact of the Covid-19 pandemic.

The review also contains qualitative evidence and insights from our partners including people with lived experience of homelessness, frontline workers and service providers across the city. All contributors have offered constructive challenge and feedback and have worked with us to identify the issues the new homelessness and rough sleeping strategy must address.

Our thanks to all of those who have contributed to this review.

## Key findings and recommendations

This section summarises key findings from our review. The recommendations here are intended to be strategic and to inform the development of the new homelessness and rough sleeping strategy. There are other findings in the body of the review that may be relevant for commissioning and service improvement purposes.

### Prevention

National and local evidence demonstrates that prevention works when deployed effectively – in Brighton & Hove 66% of prevention duties ended with positive outcomes in 2024. However, the council is seeing fewer people before they become homeless, with prevention assessments falling from 854 in 2023 to 594 in 2024. People with lived experience reported feeling ‘isolated, unsupported, unsure of where to go’ and said they faced barriers in accessing help before they became homeless.

**Recommendation 1: Over the life of the strategy, work to shift the focus of prevention activity ‘upstream’ to identify individuals and households at risk and offer advice and practical support before they reach crisis point.**

Moving prevention activity 'upstream' requires working with partners across health, social care, criminal justice, education, and voluntary sectors to identify people at risk of homelessness earlier. This should include improved use of data, including predictive analytics, training for frontline workers in universal services to recognize homelessness risk, and clear referral pathways.

**Recommendation 2: Develop frontline partnership working, including through the duty to refer, and strengthen the approach to hidden homelessness.**

While 517 referrals were made through duty to refer between 2020-2024, this represents significant untapped potential. Based on national evidence, women and young people are likely to be under-represented in council data, with many oscillating between different forms of insecure housing and homelessness and some not approaching the council for support. Targeted outreach and engagement approaches, combined with strengthened partnerships with universal and specialist services including employment, education and training, community safety and health and social care services.

**Recommendation 3: Improve accessibility and coordination of advice services and reduce barriers to seeking help**

People with lived experience of homelessness highlighted difficulties accessing support, including problems contacting the council, lack of clear information about processes and rights, and having to repeat their stories multiple times. A coordinated approach with clear access points, improved communication, and ‘no wrong door’

principles would enable earlier intervention and prevent people reaching crisis before accessing help.

**Recommendation 4: Strengthen prevention and early intervention with key at risk groups including, people leaving institutions, care settings, including the asylum system and supported housing, and people fleeing domestic abuse.**

The data shows that some groups are significantly over-represented among those experiencing homelessness. Discharge planning from institutional care, crisis support for those fleeing their homes and targeted early intervention can prevent homelessness and rough sleeping, with specialist protocols in place for at-risk groups.

**Recommendation 5: Implement rapid response systems to prevent entrenched rough sleeping through fast-track access to assessment and accommodation.**

With almost a third of people experiencing rough sleeping being new each month, rapid intervention can prevent entrenchment. This should include assertive outreach, improved assessment processes, rapid access to accommodation, and intensive early support to address the factors that led to rough sleeping. Eviction from temporary and supported accommodation due to unaddressed support needs can lead to cyclical or long-term rough sleeping.

### Temporary accommodation

The number of households in temporary accommodation has risen over the last two years with 1,928 households at the end of 2024. As well as rising demand, there is a limited supply of suitable accommodation and escalating costs. The use of more expensive spot-purchased accommodation has also increased, with numbers rising from 114 to 379 units between 2022 and 2024. Move on from temporary accommodation is also an issue with a lack of suitable properties for private or social rent. Some people with lived experience reported feeling unsupported after move-on and highlighted an issue with a 'revolving door' of repeat homelessness for those whose support needs meant they were unable to sustain tenancies in settled accommodation.

There are also problems ensuring a supply of good quality temporary accommodation that is suitable for people's needs within the city. People with lived experience and frontline support workers described properties that were 'damp and in need of repairs', lacking basic facilities, and feeling unsafe. Others highlighted that placement outside the city meant that their access to services, employment, education, and support networks were disrupted. The Health Counts survey found those in temporary accommodation were more likely to report poor mental health, feeling unsafe, and facing housing quality issues including damp, cold, and mould. These issues appear to relate mainly to interim placements (formerly known as emergency accommodation).

**Recommendation 6: Implement a comprehensive approach to reducing the use of temporary accommodation over the life of the strategy focusing on prevention, the supply of suitable accommodation, and accelerated move-on. This should have short, medium and long-terms goals, with an immediate goal of tackling rising costs to stabilise the system.**

A projected 40% increase in net costs over the next two years demonstrates the unsustainability of current trends. A coordinated strategy should include prevention measures to reduce inflow, increased supply of suitable accommodation to meet both immediate needs and ensure improved quality in the long-term, and systematic approaches to accelerate move-on to settled housing. This requires a whole system approach given the housing supply and affordability challenges. It will also require difficult financial decisions in the short-term to stabilise the system and ensure longer term sustainability.

**Recommendation 7: Improve standards for all temporary accommodation with a focus on interim accommodation.**

The evidence from people with lived experience and health data indicates quality issues in some forms of temporary accommodation that impact health and other outcomes. This includes ensuring accommodation meets the specific needs of different household types. The expected extension of the Decent Homes Standard to private rented sector properties should facilitate this but enforcement may require additional resourcing.

**Recommendation 8: Reduce reliance on spot-purchased accommodation through increased block-booking and direct provision**

The significant increase in higher cost spot-purchased units highlights the financial unsustainability of current approaches. Developing longer-term arrangements with private landlords and increasing council-owned stock would provide better value for money and improved accommodation standards while reducing use of less suitable accommodation types, especially the use of B&B accommodation.

**Recommendation 9: Improve our understanding of the support and service needs of people living in temporary accommodation through a comprehensive needs assessment.**

Local Health Counts data indicate that there are significant health inequalities for those living in temporary accommodation. It does not consider the impact on children nor the impact on other outcomes such as employment, education and training. National evidence indicates that these are significant. Local specialist provision for people living in temporary accommodation is limited with most services focused on single homelessness and rough sleeping.

## Providing support

Most people experiencing homelessness have one or more support needs. The most common needs amongst those owed a relief duty include mental health needs (affecting 35% of those owed a relief duty), physical ill health and disability (22%), and substance use (12% drug, 10% alcohol).

More people are approaching the council with higher levels of need or with more complex needs. People with multiple compound needs are a particularly vulnerable group, with 704 people identified as experiencing homelessness with 2 or more other support needs. People sleeping rough often have the highest level of need, with complex and intensive support intervention needed. The current service landscape includes comprehensive provision but there are challenges with coordination, capacity, and sustainability. This includes existing day centre and supported housing models which should be reviewed.

**Recommendation 10: Work with partners to develop integrated care pathways for people with multiple compound needs, including reviewing Housing First approaches for those with histories of long-term and repeat rough sleeping.**

The independent evaluation of Changing Futures Brighton & Hove provides a clear framework for developing integrated support for the most vulnerable. This should include the planned Multiple Compound Needs Integrated Community Team with trauma-informed approaches. The existing Housing First service accommodates 60 people but could be expanded if financially viable given the evidence of its effectiveness for those with complex needs and histories of rough sleeping.

**Recommendation 11: Strengthen mental health and substance use support with better integration between homelessness, health, and specialist services.**

With mental health problems affecting significant proportions of people experiencing homelessness and substance dependency being a major issue, better integration is needed between housing, health, and specialist services. This should include improved pathways, shared protocols, co-located services where appropriate, and enhanced partnerships with health services to address the healthcare needs of people experiencing homelessness.

**Recommendation 12: Expand trauma-informed approaches across all homelessness services with enhanced peer support and lived experience involvement in service design and improvement.**

The evidence shows high levels of trauma among people experiencing homelessness, including domestic abuse, adverse childhood experiences, and repeated homelessness. All services should adopt trauma-informed approaches, with staff training and service design reflecting understanding of trauma's impact on engagement



and recovery. This should include expanded peer support roles and systematic involvement of people with lived experience in service design and delivery.

**Recommendation 13: Ensure that appropriate pathways and protocols are in place for those more vulnerable if they become homeless.**

This includes care leavers, 16–17-year-olds, pregnant women, families with children, domestic abuse survivors, refugees and asylum seekers, LGBTQ+ people and other groups including people with mental health needs, those experiencing frailty, long term ill health or disability, to ensure coordinated assessment and support pathways.

### Children, families and young people

Children (0-17) are disproportionately overrepresented amongst those experiencing homelessness. There were around 1,400 homeless children in June 2024, representing almost 40% of all homeless people in the city. Children make up about 17% of the city's population. At the end of 2024, 47% of households in temporary accommodation contained children. The number of young people aged 16-24 accepted as owed a main housing duty more than doubled from 52 in 2020 to 116 in 2024.

National evidence shows the significant consequences of homelessness for both children and young people. Survey research by Shelter found that 61% of parents felt temporary accommodation negatively impacted their children's stress or anxiety, while 47% of children had to move schools. The evidence also shows particular vulnerabilities for care leavers and young people with complex needs.

**Recommendation 14: Develop a comprehensive approach to early identification and supporting families at risk of homelessness with early identification systems in schools, health services, and early help and family protection services.**

The high proportion of children experiencing homelessness requires a dedicated focus that works across universal services. This should include training for staff to identify early warning signs, improved referral, integration with children's social care assessment processes, to address underlying issues before homelessness occurs. Preventing homelessness in families protects children from significant trauma and developmental harm. This can impact outcomes over a lifetime and potentially realise long term cost savings to the council and its partners.

**Recommendation 15: Review and improve pathways and support for vulnerable families, children and young people including those fleeing domestic abuse, care leavers, young parents, and those with complex needs.**

People fleeing domestic abuse represent a significant and vulnerable group. The pan-Sussex domestic abuse accommodation strategy is due for renewal. The increase in young people accepted as owed a main housing duty indicates growing levels of

vulnerability. Support service should address the distinct developmental needs of young people, including life skills training, education and employment support, and mental health provision. For care leavers, this should build on existing protocols to ensure transition to independence with adequate housing and support in place. Young parents require additional help combining parenting assistance with their own developmental needs.

**Recommendation 16: Strengthen partnership working between homelessness services and children's services, education, and youth services**

To address the needs of children and young people affected by homelessness requires enhanced partnership working to address both immediate housing needs and longer-term outcomes. This should include joint assessment processes, shared case management for families, and coordinated planning for young people transitioning to independence. Partnerships with education services are particularly important to minimise school disruption and support educational continuity.

**Recommendation 17: Review existing services and develop trauma-informed, age-appropriate provision that address the specific impacts of homelessness on children and young people's development**

National evidence shows significant psychological and developmental impacts of homelessness on children and young people. Services should be designed with understanding of child development and the ways homelessness affects different age groups. Those working with children and families should receive training in trauma-informed approaches and child development.

## **Delivering the strategy**

There are systemic challenges in achieving and sustaining long term change. These include a chronic shortage of affordable housing that meets people's needs, including accessible and family housing. There are broader economic pressures with rising inflation, increases in private sector rents and a Local Housing Allowance that is insufficient to cover housing costs for those on low incomes. Those approaching the council for support have increasing levels and complexity of need. There are also acute financial pressures affecting the council and its partners.

Achieving the desired shift to prevention is particularly challenging in a context where increasing demand and costs are absorbing more resources. Financial resources are also expected to shrink over the life of the strategy. In this unprecedented scenario both evidence-based, and innovative solutions are required. Clear prioritisation and difficult, strategic decisions are needed to address short-, medium- and long-term goals.

**Recommendation 18: Embed homelessness prevention and response within a broader strategic framework addressing issues of housing supply, affordability, and economic growth.**

The homelessness and rough sleeping strategy should be framed within a broader strategic approach that addresses issues of housing supply, affordability and economic growth as set out in the council plan *A better Brighton & Hove for All*, the housing strategy *Homes for Everyone*, the City Plan and the economic plan *Fairer, Greener, More Productive*. Even if progress is made on the drivers of homelessness, significant impact is unlikely to be realised in a 5-year timeframe. The council should therefore continue to work with its partners at local, regional and national levels to achieve the long-term changes required.

**Recommendation 19: Establish clear governance arrangements for strategy delivery and rationalise and strengthen partnership working.**

The current 32 partnership groups potentially create confusion and duplication. A new governance structure should include a strategic steering group with themed delivery groups covering prevention, accommodation, support services, and children and families. This would provide clear accountability and coordination for strategy implementation while ensuring the distinct needs of different groups are addressed.

**Recommendation 20: Develop a short to medium term recovery plan that addresses the impact of rising demand and increasing costs on the homelessness system across the pathway.**

The potential reduction in grant funding and further restrictions on its use create a significant financial challenge. There are also pressures on the council's overall budget position and those of its partners. In the short-term, action is needed to manage demand and bring down cost. In the medium-term there may be opportunities to pool funding and develop innovative models for service provision, including exploring social investment approaches.

**Recommendation 21: Strengthen co-production and lived experience involvement in service design and delivery across all aspects of homelessness services**

Involving people with lived experience can have a significant impact in improving services. This should be embedded systematically across all services, with resources for lived experience involvement, peer support roles, and feedback mechanisms. Approaches should ensure the voices of different groups, including children, young people, and families, are heard and acted upon.

**Recommendation 22: Improve the collection and use of data to enable a clearer picture of demand and need. This includes more 'real-time' data analysis including financial data. Address gaps in our understanding and develop systems to collect**

**and analyse relevant data. This includes assessment of the needs of people living in temporary accommodation, including children and families and young people.**

There are significant gaps in our understanding of the needs of people experiencing homelessness. For example, council data collection systems only capture the support needs of the main homelessness applicant, with the needs of other members of the household not recognised. Some groups, such as young people and women are likely to be underrepresented in our data. Work to better capture and understand their needs would facilitate a data-led approach to the commissioning and provision of services.

# Context

## Definitions

There are different ways to define homelessness. Many people think about rough sleeping when they think about homelessness. Rough sleeping includes people bedding down on the streets or sleeping in unsuitable places such as on public transport, or in disused buildings.

The definition of homelessness used in this review encompasses not only rough sleeping but also people experiencing statutory homelessness and those living in precarious or temporary housing situations. People can be considered homeless even if they have a roof over their head if that accommodation is temporary, unsafe, or they have no legal right to remain there.

Statutory homelessness is a legal definition of homelessness that triggers a local housing authority's duty to provide help. Under UK law, a person is considered homeless if they have no accommodation that they are entitled to occupy, or they have accommodation but cannot reasonably be expected to continue occupying it. This includes situations where they have been evicted or asked to leave; where they cannot afford to pay rent or a mortgage and face eviction or repossession; where the accommodation is overcrowded, in poor condition, or unsuitable; where they face domestic abuse or harassment; or where they have been staying temporarily with friends or family but can no longer do so.

Local housing authorities like Brighton & Hove City Council have specific duties toward those who are statutorily homeless, including conducting assessments and potentially providing temporary or permanent accommodation. However, these duties are subject to eligibility criteria, priority need categories, and requirements around local connection and intentionality.

Hidden homelessness refers to people or households that are generally not captured in official statistics, usually because they have not approached their local housing authority for help or have not met eligibility criteria. It could involve 'sofa-surfing', staying with friends or family, people sleeping in vehicles or people selling sex for accommodation.

Temporary accommodation is a broad term. In this review it refers to interim accommodation secured by the council to meet its duties to homeless households under the 1996 Housing Act. It can include short term accommodation to meet a homeless household's immediate needs. It also includes longer term accommodation provided while a household which has been accepted as owed a main housing duty waits to move into permanent housing. For some households this can lead to years living in settled temporary accommodation with which they are happy. Temporary

accommodation can include private rented housing, council owned properties, hostels and refuges as well as Houses in Multiple Occupation, B&Bs or hotels.

## The legal and policy context

### Key legislation

[Housing Act 1996 \(Part 7\)](#) provides the main legal foundation for preventing homelessness and assisting those threatened with or experiencing homelessness. It was amended by the [Homelessness Act 2002](#), which extended priority need categories to include 16–17-year-olds, care leavers (18-20), and people vulnerable due to time in care, armed forces, prison, or fleeing violence. It required all housing authorities to develop homelessness strategies (renewed every 5 years) and mandated a strategic approach to prevention and accommodation provision

The [Homelessness Reduction Act 2017](#) extended the prevention duty period from 28 to 56 days and required housing authorities to provide support to all affected households, not just those with priority need. It introduced a 56-day support period for those already homeless and required housing authorities to work with applicants to agree personalised housing plans.

The [Domestic Abuse Act 2021](#) extended priority need to all eligible domestic abuse victims and introduced new definition of domestic abuse for housing assessments.

The [Supported Housing \(Regulatory Oversight\) Act 2023](#) brought in enhanced regulation of supported housing through the introduction of national standards and licensing schemes. The regulations and provisions within the Act are expected to be implemented over the next 2 years.

Housing authorities must also consider [Children Act 1989](#) duties, public sector equality requirements, and health and wellbeing responsibilities when addressing homelessness.

An overview of the homelessness legislation is available in the government's [Homelessness code of guidance for local authorities](#).

### Core duties and processes

Housing authorities have a legal **duty to provide advice and information** about homelessness and the prevention of homelessness and the rights of homeless people or those at risk of homelessness, as well as the help that is available and how to access it. This should be designed with certain listed vulnerable groups in mind. These are prison leavers, care leavers, former members of the regular armed forces, victims of domestic abuse, persons leaving hospital, persons suffering from a mental illness or

impairment, as well as any other group that the authority identify as being at particular risk of homelessness. Authorities can provide the advice and information themselves or arrange for other agencies to do it on their behalf.

Housing authorities have a **duty to carry out an assessment** in all cases where an eligible applicant is homeless or threatened with homelessness. This should identify what has caused the homelessness or threat of homelessness, the housing needs of the applicant and any support they need to be able to secure and retain accommodation. Following this assessment, the housing authority must work with the person to develop a **personalised housing plan** which will include actions (or 'reasonable steps') to be taken by the authority and the applicant to try and prevent or relieve homelessness.

### **The prevention duty**

Housing authorities have a duty to take reasonable steps to help prevent any eligible person (regardless of priority need status, intentionality and whether they have a local connection) who is threatened with homelessness from becoming homeless. This means either helping them to stay in their current accommodation or helping them to find a new place to live before they become homeless. The prevention duty continues for 56 days unless it is ended by an event such as accommodation being secured for the person, or by their becoming homeless.

### **The relief duty**

If the applicant is already homeless, or becomes homeless despite activity during the prevention stage, the reasonable steps will be focused on helping the applicant to secure accommodation. This relief duty lasts for 56 days unless ended in another way. If the housing authority has reason to believe a homeless applicant may be eligible for assistance and has a priority need, they must be provided with interim accommodation.

### **The main housing duty**

If homelessness is not successfully prevented or relieved, a housing authority will owe the main housing duty to applicants who are eligible, have a priority need for accommodation and are not homeless intentionally. Certain categories of household have priority need if homeless, including pregnant women, families with children, and those who are homeless because of being a victim of domestic abuse or due to an emergency such as a fire or flood. Other groups may be assessed as having priority need because they are vulnerable because of old age, mental ill health, physical disability, having been in prison or care or because of becoming homeless due to violence.

Under the main housing duty, housing authorities must ensure that suitable accommodation is available for the applicant and their household until the duty is ended, usually through the offer of a settled home. The duty can also be ended for other reasons, such as the applicant turning down a suitable offer of temporary accommodation or because they are no longer eligible for assistance. A suitable offer of a settled home (whether accepted or refused by the applicant) which would bring the main housing duty to an end includes an offer of a suitable secure or introductory tenancy with a local authority, an offer of accommodation through a registered provider (also known as a housing association) or the offer of a suitable tenancy for at least 12 months from a private landlord made by arrangement with the local authority.

Housing authorities have various powers and duties to secure accommodation for homeless applicants, either on a temporary basis, to prevent or relieve homelessness, to meet the main housing duty or as a settled home. Accommodation must always be 'suitable' and there are set standards when private rented accommodation is secured for households which have priority need. Bed and breakfast accommodation is not considered suitable for families with children and households that include a pregnant woman, except where there is no other accommodation available, and then only for a maximum of 6 weeks. It is also deemed unsuitable for 16- and 17-year-olds.

A person would be **intentionally homeless** where homelessness was the consequence of a deliberate action or omission by that person. A deliberate act might be a decision to leave the previous accommodation even though it would have been reasonable for the person (and everyone in the person's household) to continue to live there. A deliberate omission might be non-payment of rent that led to rent arrears and eviction despite the rent being affordable.

Where people have a priority need but are intentionally homeless, the housing authority must provide advice and assistance to help them find accommodation for themselves and secure suitable accommodation for them for a period that will give them a reasonable chance of doing so. If, despite this assistance, homelessness persists, any children in the household could be in need under the Children Act 1989, and the family should be referred (with consent) to the children's social services authority.

In the homelessness legislation, people may have a **local connection** with a district because of residence, employment or family associations in the district, or because of special circumstances. There are exceptions, for example, residence in a district while serving a prison sentence there does not establish a local connection. Where applicants meet the criteria for the relief duty or for the main housing duty, and the authority considers that the applicant does not have a local connection with the district but does have one somewhere else, the housing authority dealing with the application



can ask the housing authority in that other district to take responsibility for the case. However, applicants cannot be referred to another housing authority if they, or any member of their household, would be at risk of domestic abuse or violence (that is not related to domestic abuse) in the district of the other authority.

The definition of a 'local connection' for young people leaving care was amended by the Homelessness Reduction Act 2017 so that a young homeless care leaver has a local connection to the area of the local authority that looked after them. Additional provision is made for care leavers who have been placed in accommodation, under section 22A of the Children Act 1989, in a different district to that of the children's services authority that owes them leaving care duties. If they have lived in the other district for at least 2 years, including some time before they turned 16, they will also have a local connection with that district until they are 21.

### **The duty to refer**

The Homelessness Reduction Act 2017 introduced a duty on certain named public authorities to refer service users who they think may be homeless or threatened with homelessness to a housing authority. The service user must give consent and can choose which authority to be referred to. Local housing authorities are required to incorporate the duty to refer into their homelessness strategy and establish effective partnerships and working arrangements with agencies to facilitate appropriate referrals.

## **National strategic and policy context**

A **national strategy on rough sleeping**, [\*Ending Rough Sleeping for Good\*](#), was published in September 2022 with funding to 2025. It set out a four-pronged approach to rough sleeping of prevention, intervention, recovery and a more transparent and joined-up system.

After the 2024 national election, the new Labour government made a commitment to introduce **a new cross-government homelessness strategy** to address all forms of homelessness, not just rough sleeping. It is expected to have a focus on preventing homelessness. The work to develop the strategy has been led by the Ministry of Housing, Communities and Local Government with a launch now expected in late 2025.

As well as specific legislation and policy to tackle homelessness, homelessness is impacted by policy across a range of other areas.

The **Local Housing Allowance** is set nationally and determines the maximum housing benefit for private renters. It is meant to cover the bottom 30% of rents in a local area. The allowance has been frozen since 2020. This has a significant impact in a city like Brighton & Hove with a large private rented sector and where rents have risen

significantly over the last 5 years. It means that very few properties are available at the Local Housing Allowance rate, making it difficult for people on low incomes to find and afford suitable accommodation in the city.

In addition, the amount local authorities can claim against the cost of placing people in temporary accommodation is pegged at 90% of 2011 private rental levels. As noted above, private sector rents have risen significantly since 2011, so the recoverable amount for the council is now much lower. This is a problem which affects all housing authorities but for Brighton & Hove the funding gap is particularly acute.

The government has also set out plans to provide ‘the biggest increase in social and affordable housebuilding in a generation’. To date, it has announced an additional £500 million of investment in the current **Affordable Homes Programme (AHP)**, bringing total investment in the AHP for 2025/26 to over £5 billion. The government is also aiming to ‘better protect our existing stock’ of social housing by making changes to the Right to Buy policy.

National **health and social care policy** is currently focussed on 3 ‘strategic shifts’, moving care from hospital to community, ‘analogue to digital’ healthcare and, a shift in focus from treatment to prevention. Work is underway across Sussex to mobilise community-based models, including Integrated Community Teams and Mental Health Neighbourhood Teams. The local footprints of the new teams should support integration of health with social care and housing services.

## Local strategic and policy context

Brighton & Hove City Council published a new council plan [A Better Brighton & Hove for All](#) in July 2023. The plan has ‘homes for everyone’ as a core mission with the explicit goal of delivering ‘accessible, affordable, and high-quality homes for all residents of Brighton & Hove’. The plan was refreshed in July 2025, with commitments to improve standards in the private rented sector, deliver at least 2,000 affordable homes, create additional social housing lets, reduce the number of households in temporary accommodation, work with people with lived experience of homelessness to improve homelessness and housing options services, and to improve housing solutions for domestic abuse survivors.

In October 2024, the council agreed [Homes for everyone](#), a new housing strategy for 2024 to 2029. The priorities in the strategy are to improve housing quality, safety and sustainability; to deliver the homes our city needs; to prevent homelessness and meet housing need; to promote improved health and wellbeing for all; and to provide resident focused housing services.

The [City Plan](#) is the strategic planning framework that sets out the long-term spatial vision and development strategy for the city of Brighton & Hove. The current plan was

adopted in 2016. The ongoing review and update of the City Plan Part 1 will take it to 2041. The City Plan is informed by the Strategic Housing Market Assessment commissioned by the council in 2023 which makes recommendations for new housing delivery targets and the mix of housing in the city, including the delivery of affordable and socially rented homes.<sup>2</sup> Plans for economic growth and the labour market are outlined in the city's 3-year [Economic Plan for 2024 to 2027](#).

Other relevant strategies and plans include the [Community Safety and Crime Reduction Strategy 2023 to 2026](#), which amongst other priorities contains plans for tackling domestic abuse and dealing with anti-social behaviour. More detailed plans on tackling domestic abuse are included in the [Preventing and Tackling Violence Against Women and Girls, Domestic Abuse and Sexual Violence Strategy 2025-2028](#).

The council is also required to set out how it will help, support and protect survivors of domestic abuse (and their children) in safe accommodation, in line with duties under the national Domestic Abuse Act 2021. It did this in the [Pan-Sussex Strategy for Domestic Abuse Accommodation and Support 2021-2024](#). The strategy was developed in partnership with the Sussex Police and Crime Commissioner, West Sussex County Council, East Sussex County Council. Work is currently underway to refresh the strategy.

The [Brighton & Hove mental health and housing plan](#) was produced by Sussex Health & Care Partnership. It has 5 strategic priorities which aim to improve outcomes and increase access to support and accommodation for people with mental health needs through better integration of housing, health and care services. Delivery of the action plan is overseen by the multi-agency Mental Health Accommodation Group.

The council sets out who gets priority for social housing in its [Housing Allocations Policy](#). In 2025, the council changed its Housing Allocations Policy with the goal of creating more opportunities to prevent homelessness, reduce reliance on temporary accommodation and provide more options for social housing tenants fleeing domestic abuse. Under the revised policy, if a household likely to be owed the main housing duty secures alternative accommodation while homeless or at risk of homelessness, they can remain on the housing register if they continue to qualify. The council anticipates that this will help reduce the number of households living in temporary accommodation in the city.

The council has recently developed a joint protocol to improve its response to the needs of homeless 16- and 17-year-olds. A care leavers' housing protocol has also been agreed, to ensure that looked after children have a firm offer of accommodation

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<sup>2</sup> Brighton & Hove City Council / Iceni Projects, 2023, *Strategic Housing Market Assessment* <https://www.brighton-hove.gov.uk/planning/planning-policy/strategic-housing-market-assessment-august-2023>

which meets their needs on leaving council care. Support for care leavers, including accommodation support is set out the [Local Offer for Care Leavers](#). An Accredited Provider List to provide supported accommodation for care-experienced young people aged between 16 and 24 is in place. For 16- and 17-year-olds this offers an alternative to foster care or residential childcare placements for young people who find it difficult to thrive in those environments.

The council took part in legal action against the Home Office concerning the treatment of unaccompanied asylum-seeking children, winning a landmark case in the High Court in 2023. The judgment has led to a change in national policy, so that unaccompanied asylum-seeking children can no longer be placed in hotels and B&Bs but must be placed by the National Transfer Scheme into foster placements under the Children Act.

The [Pan Sussex Trauma-Informed Framework](#) was developed by Brighton & Hove and Sussex local authorities, Sussex Health Trusts, the community and voluntary sector and people with lived experience. Its goal is to create lasting, high-quality trauma-informed practice across the region.

## Planned legislation and policy changes

The Renters Rights Bill was introduced to parliament in September 2024. The government promises to transform the experience of private renting, including by ending Section 21 ‘no fault’ evictions. The bill aims to give renters greater security and stability ‘so they can stay in their homes for longer, build lives in their communities, and avoid the risk of homelessness’.<sup>3</sup>

As well as ending Section 21 evictions the bill introduces a range of reforms, including ending the system of assured shorthold tenancies; creating a new register of private rented sector (PRS) landlords and property portal to improve data on the PRS and drive up standards; protecting tenants from above market rent increases, providing stronger protections against backdoor evictions; applying both the Decent Homes Standard and Awaab’s Law to the private rented sector (including temporary accommodation and supported housing); making it illegal for landlords and agents to discriminate against prospective tenants in receipt of benefits or with children; prohibiting landlords from soliciting rental bidding; establishing an Ombudsman to help tenants and landlords to resolve disputes; and enabling better enforcement through expanded use of Rent Repayment Orders.

Private landlords play an important role in housing in the city, with around 1 in 3 homes privately rented. While most private sector landlords provide a good service, the sector currently has some of the least affordable, poorest quality and most insecure housing

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<sup>3</sup> Guide to the Renters Rights Bill, Ministry of Housing, Communities & Local Government, <https://www.gov.uk/government/publications/guide-to-the-renters-rights-bill/guide-to-the-renters-rights-bill>

of all forms of tenure. A well-functioning private rented sector should provide security for both tenants and landlords as well as alleviating homelessness.

The Planning and Infrastructure Bill was introduced to parliament in March 2025. It is central to the government's ambitions to deliver 1.5 million homes and decide 150 nationally significant infrastructure projects before the end of the current parliament.

In June 2025 the government announced that it would repeal the Vagrancy Act 1824 which made rough sleeping a criminal offence. This will be done through a government amendment to the Crime and Policing Bill, with the change coming into effect in 2026. The Bill will also include a new offence of facilitating begging for gain and an offence of trespassing with the intention of committing a crime, both of which were previously part of the 1824 Act.

Alongside East Sussex County Council and West Sussex County Council, Brighton & Hove City Council successfully applied to join the Devolution Priority Programme. A new Mayoral Strategic Authority for Brighton and Sussex will be created with mayoral elections planned for May 2026. At this stage the range of devolved powers for the Mayoral Strategic Authority have not been confirmed. It is likely that powers will be devolved in stages over time. In a parallel process, plans for broader local government reorganisation may result in a shift in the boundaries of the city as a local authority.

A key local ambition is the development of an integrated homeless healthcare hub that brings specialist homeless healthcare services into a central hub, so people who are homeless with Multiple Compound Needs can better access the healthcare they need. Arch Health Community Interest Company have carried out several scoping exercises and have been developing this vision with partners over many years. Work with Common Ambition's lived experience group led to the publication of *Our Big Hub Idea* in 2023.<sup>4</sup> The Big Hub idea highlights the benefits of co-locating a range of welfare and support services alongside key health services. Partners are actively working together through the Multiple Compound Needs programme to realise this ambition.

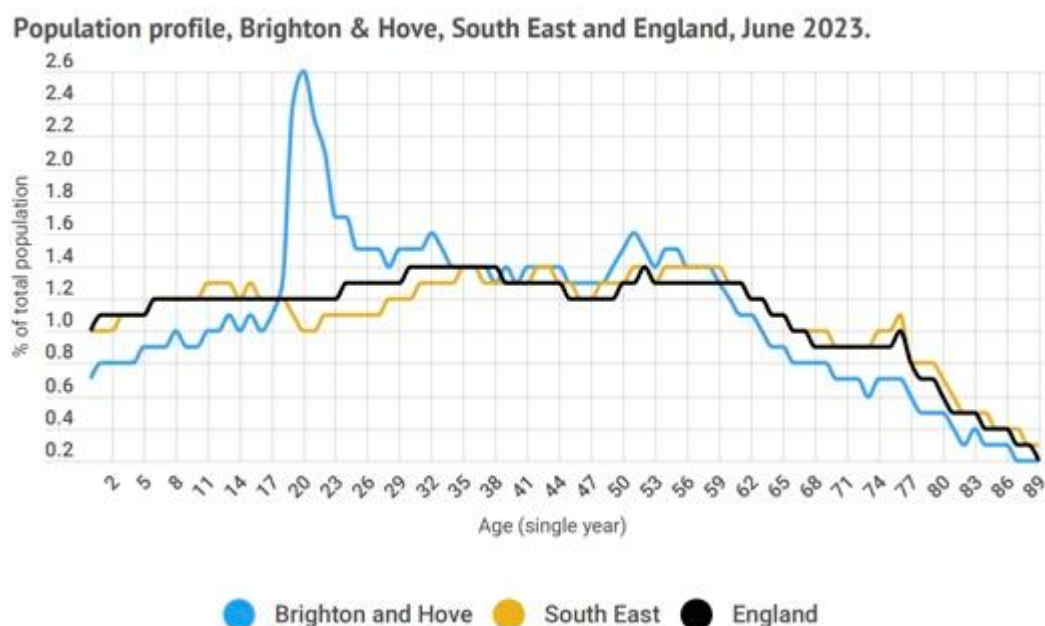
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<sup>4</sup> Common Ambition, 2023, *Our Big Hub Idea*  
<https://www.bhcommonambition.org/resources/#homeless-healthcare-hub>

## City population profile

There were 279,600 residents in the city of Brighton & Hove in 2023 according to the Office of National Statistics (ONS) mid-year population estimates.

In 2023, it is estimated that 40,800 people (15%) were aged 0 to 15 years old, more than two thirds (73%, 203,700 people) were age 16 to 66 years old, one in ten (11%, 29,600 people) were aged 67 to 84 years old and 5,400 people (2%) were aged 85 years or older.



Brighton & Hove has an unusual population profile compared to the South East and England. The city has a much higher proportion of people aged 19–31 years (23%, 64,800 people) compared to only 15% in the South East and 16% in England. The difference is most pronounced between the ages 19 to 22 years old. Nearly one in ten of Brighton & Hove's total population (9%, 26,200 people) is aged 19 to 22 years old compared to only 4% in the South East and 5% in England.

Brighton & Hove has a lower proportion of children aged 0 to 17 years of age. (17%, 46,700 people) compared to 21% in both the South East and England. There are also fewer people across all ages from the age of 60 years old. In Brighton & Hove less than a fifth of the total population (19%, 54,600 people) is aged 60 years old or older compared to 26% in the South East and 25% in England.

Our city consists of different and diverse communities. Black and Minority Ethnic groups and Lesbian, Gay, Bisexual and Trans (LGBT) people are key population groups.

The most up to date data from the 2021 census shows that 72,272 residents (26%) are from a Black or Minority Ethnic group. This is higher than in the South East (21%), and similar to England (27%).

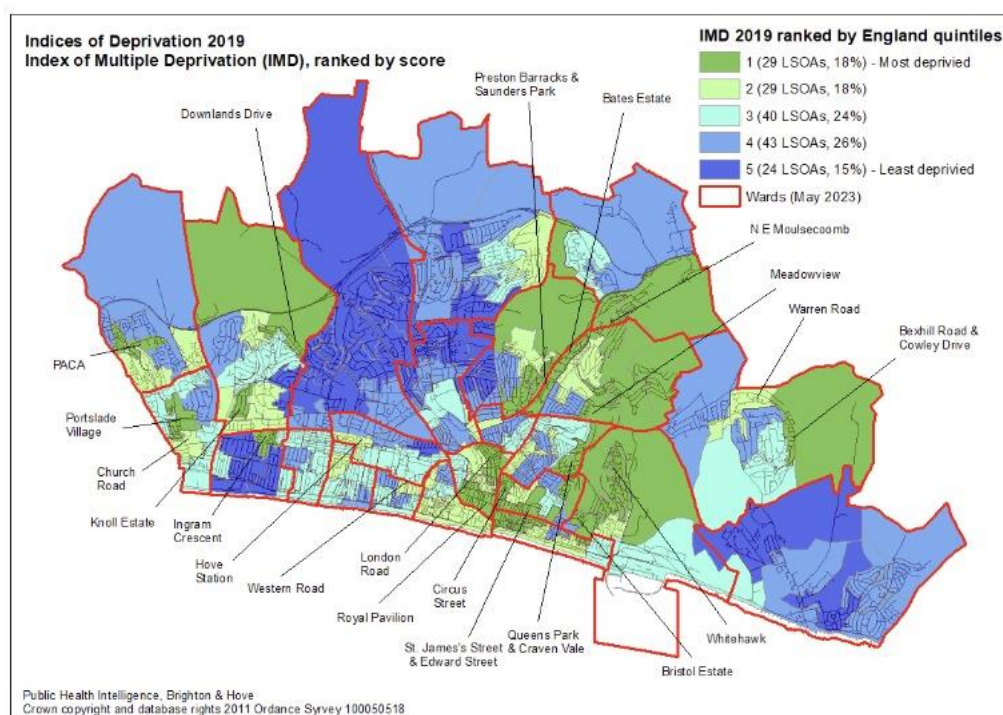


At least 25,247 residents age 16+ (10.6%) identified as Gay or Lesbian, Bisexual or Other sexual orientation. This is three times higher than seen in the South East (3.1%) and England (3.1%) and the highest proportion in any upper tier local authority in England. At least 2,341 residents aged 16+ (1.0%) identify with a gender different from their sex registered at birth. This is double what is found in the South East (0.5%) and England (0.5%).

## The broader determinants of homelessness

### Poverty, deprivation and housing quality

In 2019, 17% of the population of the city lived in one of the 20% most deprived areas in England and 13% lived in one of the 20% least deprived areas in England. Some areas are more affected by deprivation than others. The highest concentration of deprivation is in Whitehawk, Moulsecoomb, and Hollingbury. Along the coast, to the west of the city and in Woodingdean there are also pockets of deprivation. All these areas are in the 20% most deprived areas in England.



In 2023 12.1% of households in the city (15,522 households) were estimated to be in fuel poverty compared to 9.6% in the South East and 13% in England. In 2019 around 15% of children were estimated to live in poverty in the city, compared to 13% in the South East and 17% in England.

17% of occupied homes in Brighton & Hove are estimated to be non-decent under the Decent Homes Standard (20,500 homes). The percentage for England is 15%. In

Brighton & Hove, 20% of private rented homes are non-decent, 14% of social rented homes and 15% of owner-occupied homes.

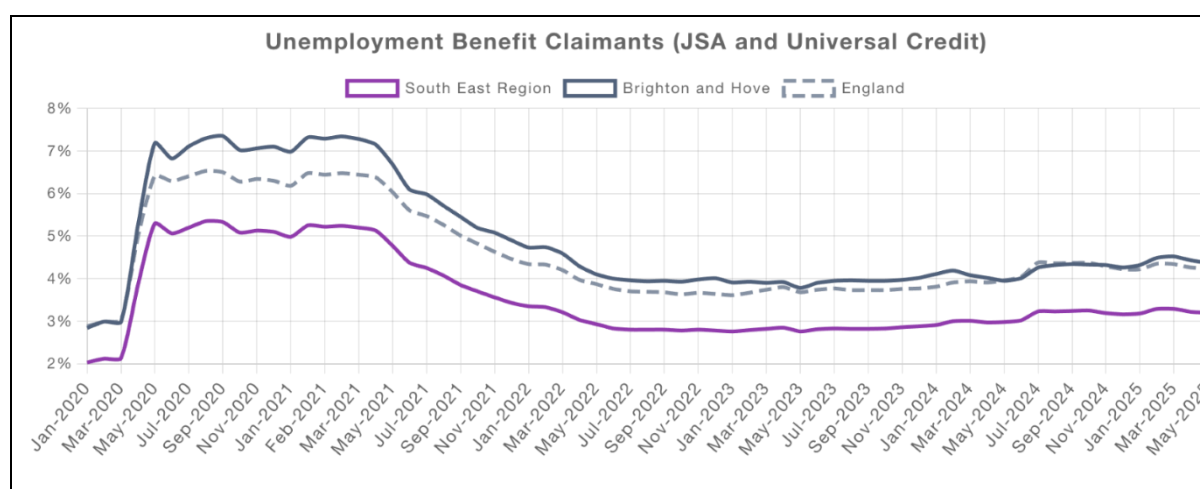
At the 2021 Census 12.53% of households in Brighton & Hove were living in overcrowded homes. This compares with 5.59% in the South East and 6.44% in England.

## Education, employment and income

At the 2021 Census, 44.52% of people in Brighton & Hove (104,790 people) had a Level 4/5 qualification (HNC/HND or equivalent). This is higher than the rates for the South East (35.77%) and England (33.92%). The percentage of people in Brighton & Hove with no 16+ educational qualifications was 12.41% (29,215 people) at the 2021 Census. This compares with 15.38% for the South East and 18.08% for England.

In May 2025, 4.37% of working age people in the city were unemployed (8,630 people). This was higher than both the South East (3.2%) and England (3.8%) averages. At 3.58% (1,360 people), the rate of youth unemployment in Brighton & Hove was lower than the South East (4.39%) and England (5.58%) averages

The chart below shows the total proportion of people receiving unemployment benefits (Job Seekers Allowance or Universal Credit) between January 2020 and May 2025 for the South East, Brighton & Hove and England.



Source: Department for Work and Pensions

At the time of the Census in 2021, 4.42% of working age adults (10,400 people) in the city were economically inactive because of long-term sickness or disability. This is higher than the South East (3.11%) and England (4.07%). In addition, another 3.05% of working age adults (7,176 people) in Brighton & Hove were economically inactive for other reasons. This compares with 2.67% in the South East and 3.14% in England.



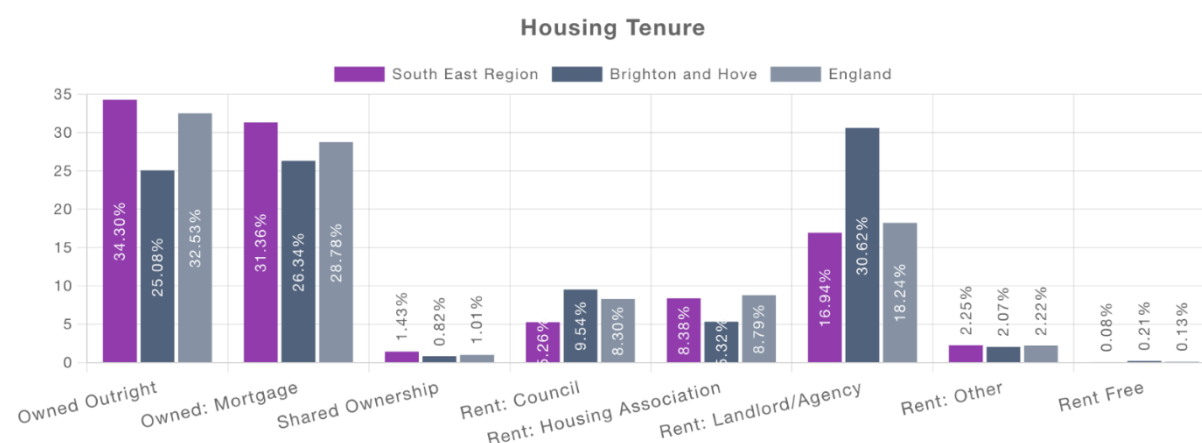
In 2023, some 16% of households had no individuals aged 16 or over in employment (15,000 households). This compares to 11% of households in the South East, and 14% in Great Britain.

The median gross weekly full-time employee earnings in Brighton & Hove in 2024 were £725. This was lower than in the South East (£754) and Great Britain (£730)

## Housing supply and affordability

### Housing tenure

Compared with the South East and England, Brighton & Hove has a lower proportion of owner occupiers and a higher proportion of private renters. The private rented sector accounts for 30.62% of homes in the city (South East 16.94%; England 18.24%). The chart below shows the proportion of housing by tenure type for the South East, Brighton & Hove and England.

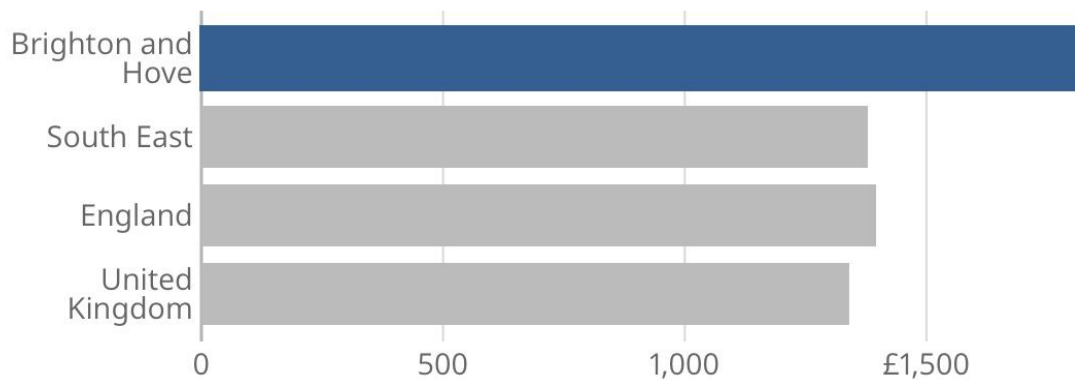


Source: Census 2021

### Private renting

The average monthly private rent in Brighton & Hove was £1,824 in May 2025. This was an increase from £1,732 in May 2024, a 5.3% rise. This is significantly higher than the average across the South East (£1,377), and England (£1,394).

## Average rental price, May 2025

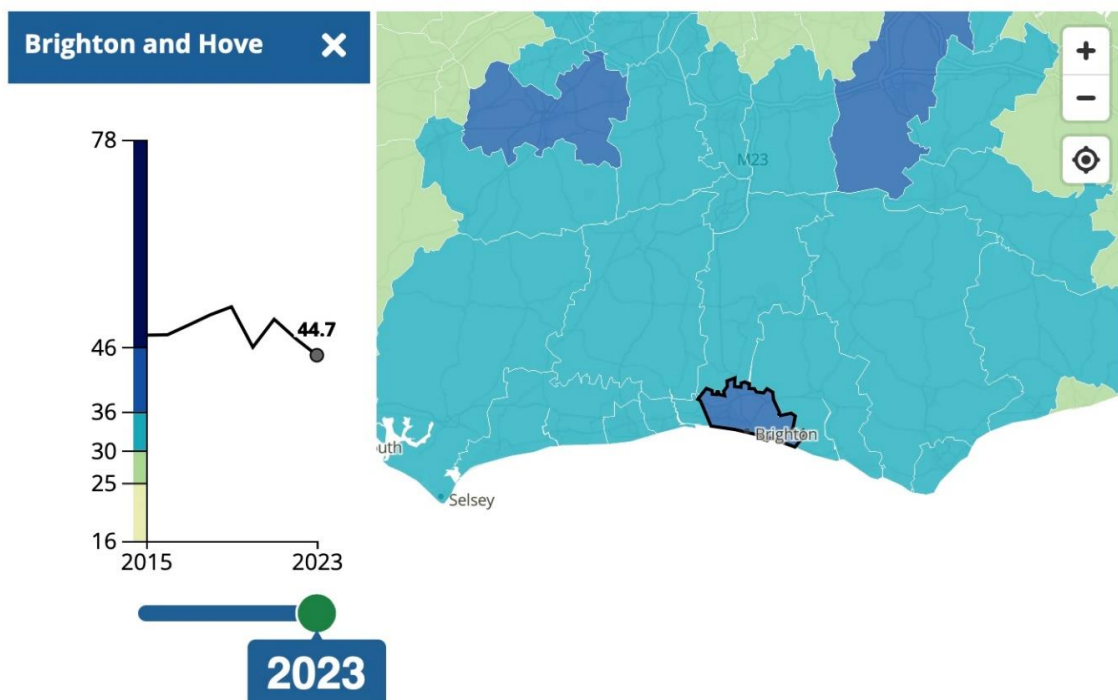


Source: Price Index of Private Rents, Office for National Statistics

The Office for National Statistics (ONS) publishes data on rental affordability. The latest figures are from 2023. The ‘affordability threshold’ is set by the ONS at 30% of a private renting household’s income. A private renter on a median household income in Brighton & Hove could expect to spend 44.7% of their household income on an average-priced rented home. This is significantly higher than the South East (31.9%) and England (34.2%) averages.

The chart below shows private rental affordability over time in Brighton & Hove between 2015 and 2023. The accompanying map shows private rental affordability in Brighton & Hove compared with surrounding local authorities in 2023.

### Private rental affordability ratios, by local authority, England and Wales, 2015 to 2023



Source: Private rental affordability, England and Wales: 2023, Office for National Statistics

Research carried out in 2022 indicates that ‘the rental property market in Brighton & Hove is very buoyant, with landlords demanding increasingly high rents as they seek to pass on the cost of mortgage/interest rate increases to renters. This is being supported by very strong demand and a shortage of rental housing stock in the city. These factors have combined to mean renters are having to bid for properties allowing landlords to secure record rents’.<sup>5</sup>

### Home ownership

According to the Office for National Statistics, the average property price for all dwelling types in Brighton & Hove in April 2025 was £413,676. This was significantly higher than the averages for the South East (£380,428) and for England (£286,327). The table below shows average prices for different types of property for Brighton & Hove, the South East and England & Wales.

### Average House Prices April 2025

	Detached	Semi-det	Terraced	Flat/maais	Average
<b>BRIGHTON &amp; HOVE</b>	£848,405	£540,748	£470,139	£308,290	£413,676
<b>SOUTH EAST</b>	£690,816	£416,441	£317,638	£211,582	£380,428
<b>ENGLAND</b>	£467,414	£282,810	£234,219	£221,608	£286,327

Source: UK House Price Index, Office for National Statistics and HM Land Registry

Housing in Brighton & Hove is less affordable than England and is becoming more expensive at a faster rate. Those on the lowest 25% of earnings in the city need 12 times their earnings to afford the lowest 25% of house prices (2022). This was higher than in the South East (10.4 times), and England (7.3 times). Over the last decade, this has increased by 8.5 times in Brighton & Hove and by 6.6 times for England.

### Future need for housing

A detailed analysis of the housing market in the city can be found in the [Brighton & Hove Strategic Housing Market Assessment](#) (SHMA) 2023. This report informs planning and housing policies in the city, including the ongoing review of the City Plan Part 1. The current City Plan expires in 2030, and the new plan will set out the strategic planning framework for Brighton & Hove until 2041. It will include targets for new housing, development and infrastructure.

The SHMA recommends a housing target of at least 810 new dwellings a year in the city. The SHMA also identifies a substantial need for an additional affordable rented homes in the city. It recommends that, while the link between overall housing need and affordable housing need is complex, the council should aim to maximise the delivery of

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<sup>5</sup> [Brighton & Hove Strategic Housing Market Assessment](#) (2023), Icen Projects Ltd, p. 124.

affordable social rented housing. The Brighton & Hove housing strategy 2024 to 2029 sets a target for delivering at least 2,000 affordable homes over the five years of the strategy.

### Health and disability

In the Census 2021, 7.34% of respondents said that their day-to-day activities were limited a lot by a long-term illness, health problem or disability. This was higher than the rate for the South East (6.26%) and similar to the rate for England (7.33%).

In Brighton & Hove 8.6% of the working age population (17,095 people) are receiving Personal Independence Payments (PIP). This is higher than the South East (7.4%) but lower than England (9.63%). The table below shows a series of indicators related to disability benefits providing the total numbers of claims and proportions within each area that are accessing the support systems available. Brighton & Hove is compared with the South East and England.

### Community connectedness

The Community Needs Index was developed by Oxford Consultants for Social Inclusion to identify areas experiencing poor community and civic infrastructure, relative isolation and low levels of participation in community life. The index was created by combining a series of 28 indicators, conceptualised under three domains: Civic Assets, Connectedness and Active and Engaged Community. A lower rank indicates that an area has relatively higher levels of need. With an overall rank in 2023 of 22,368, Brighton & Hove has lower levels of community needs than the South East (17,783) and England (17,040).

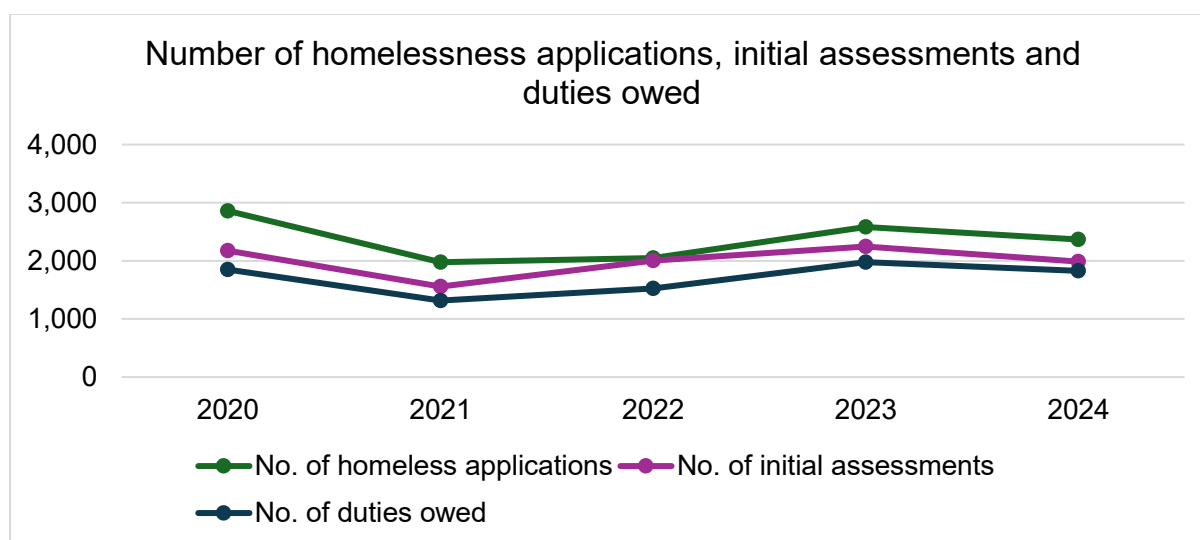
# Data on homelessness and rough sleeping in the city

## Homelessness approaches and applications

2,624 households approached the council for homelessness advice and support in 2024. Some people may approach other organisations for advice and support, but this is not captured in council data. Demand for advice and support from the council has fluctuated, with 3,014 households approaching the council in 2023. In 2022, 2,394 households approached the council.

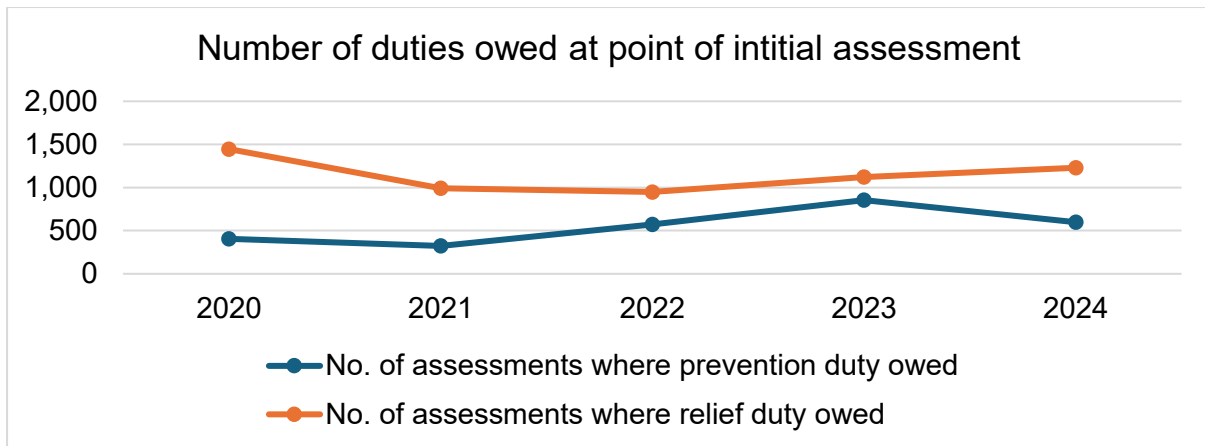
Not all approaches for advice and support result in a homeless application. For example, someone may decide not to apply if their housing situation is resolved with initial advice and support. In 2024 2,366 homelessness applications were made. This figure has risen since 2021 (1,976 applications).

The number of initial assessments has also risen since 2021, with 1,985 assessments in 2024 compared with 1,557 in 2021. Of those households assessed, a prevention or relief duty was owed in most cases, with 1,827 households owed a prevention or relief duty in 2024 compared with 1,316 in 2021.



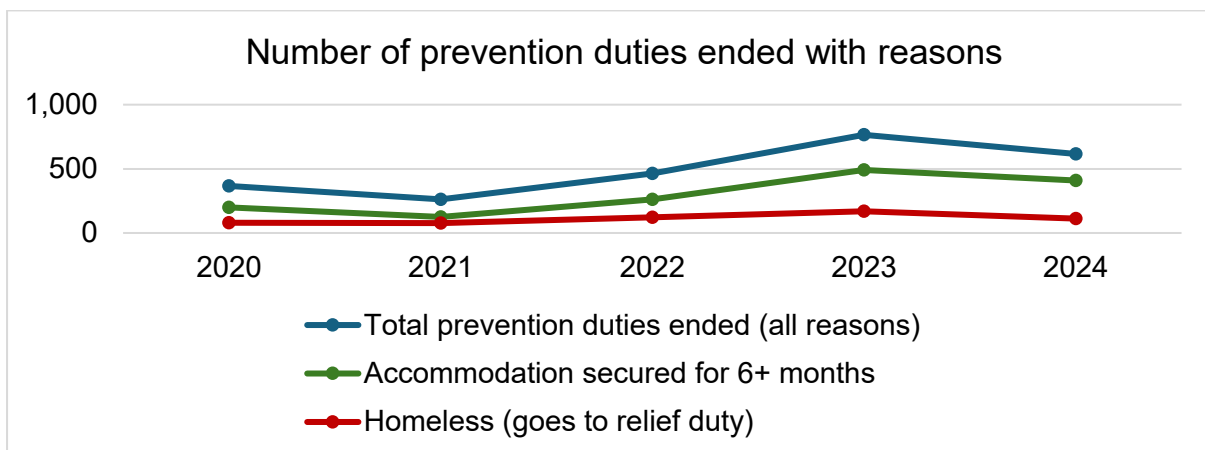
Source: Home Connections (data extracted 13 Jan 2025)

The table below shows the number of duties owed at the point of initial assessment. Between 2020 and 2024, each year more people were assessed by the council at the relief stage (when they were already homeless) than those assessed at the prevention stage (when homelessness could potentially be prevented). While the number of assessments carried out at the prevention stage rose from 406 in 2020 to 854 in 2023, the number fell to 594 in 2024. After a fall in the number of those assessed as owed a relief duty to 949 in 2022, the number rose to 1,230 in 2024.



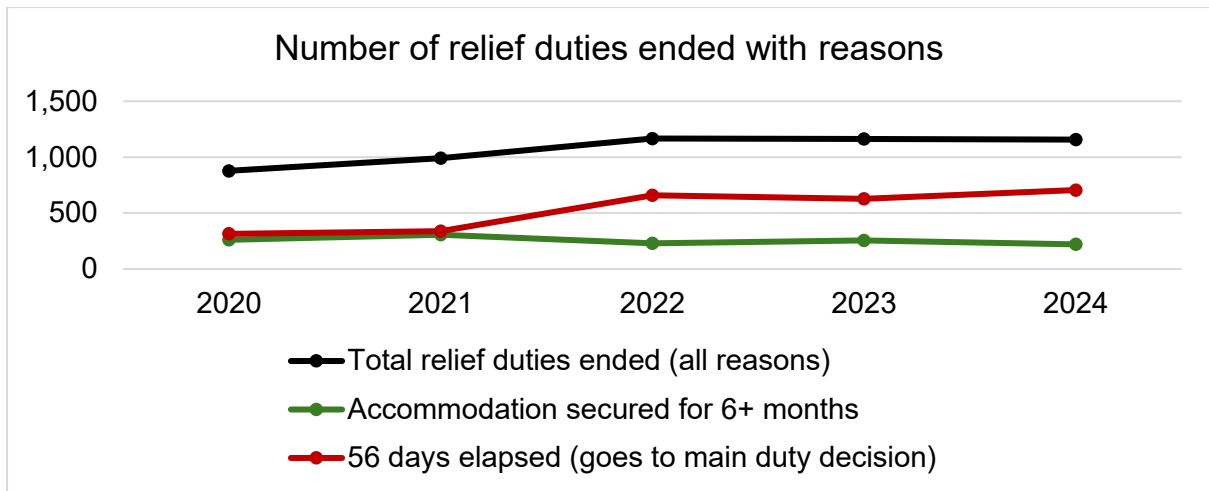
Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the reasons for ending a prevention duty between 2020 and 2024. For prevention duties which ended each year, the total number decreased from 765 in 2023 to 617 in 2024. Although the proportion of prevention duties which ended with a positive outcome (where existing or alternative accommodation was secured for 6 or more months) slightly increased, the number of households whose duty ended with a positive outcome fell, from 491 in 2023 to 410 in 2024.



Source: Home Connections (data extracted 13 Jan 2025)

The table below shows the reasons for ending a relief duty between 2020 and 2024. The total number of relief duties increased over this period from 878 in 2020 to 1,157. The number of relief duties which ended in a positive outcome with accommodation secured for 6 months or more remained relatively stable. However, the number of relief duties which did not achieve a positive outcome and moved to a main duty decision more than doubled from 314 in 2020 to 706 in 2024.



Source: Home Connections (data extracted 13 Jan 2025)

The Homelessness Reduction Act 2017 introduced a duty on certain named public authorities to refer service users (with their consent) who they think may be homeless or threatened with homelessness to a housing authority. The table below shows the number of applicants referred by those organisations. Most organisations making referrals do so at the relief duty stage, that is when their service user is already homeless.

Duty to Refer by duty owed at point of initial assessment and agency type (2020 to 2024 combined)	Where prevention duty owed	Where relief duty owed	Total referrals
Adult Secure Estate (prison)	0	8	8
Adult Social Services	8	23	31
Children's Early Help services / Children's Centres	1	1	2
Children's Social care	9	28	37
Community Based Health Service – physical health and well being	0	2	2
DWP – Jobcentre Plus	2	2	4
GPs	3	1	4
Hospital A&E or in-patient	6	66	72
Local authority landlord	2	1	3
Mental Health Service – Acute in-patient	5	50	55
Mental Health Service – Community based	24	13	37
National Asylum Service accommodation provider	1	2	3
National Probation Service	23	166	189
Other local authority service	0	4	4
Other service provider (not housing specific)	0	11	11
Police	1	20	21
Private Registered Provider (Housing Association)	0	1	1
Refuge provider	0	4	4
School, Youth and Education Services	1	10	11
Street Services for rough sleepers	0	4	4
Streetlink	0	3	3
Supported housing, hub or Housing Related Support Provider	3	6	9
Troubled Families / Families Intervention Programme	0	1	1
Youth Secure Estate	0	1	1
<b>Total</b>	<b>89</b>	<b>428</b>	<b>517</b>

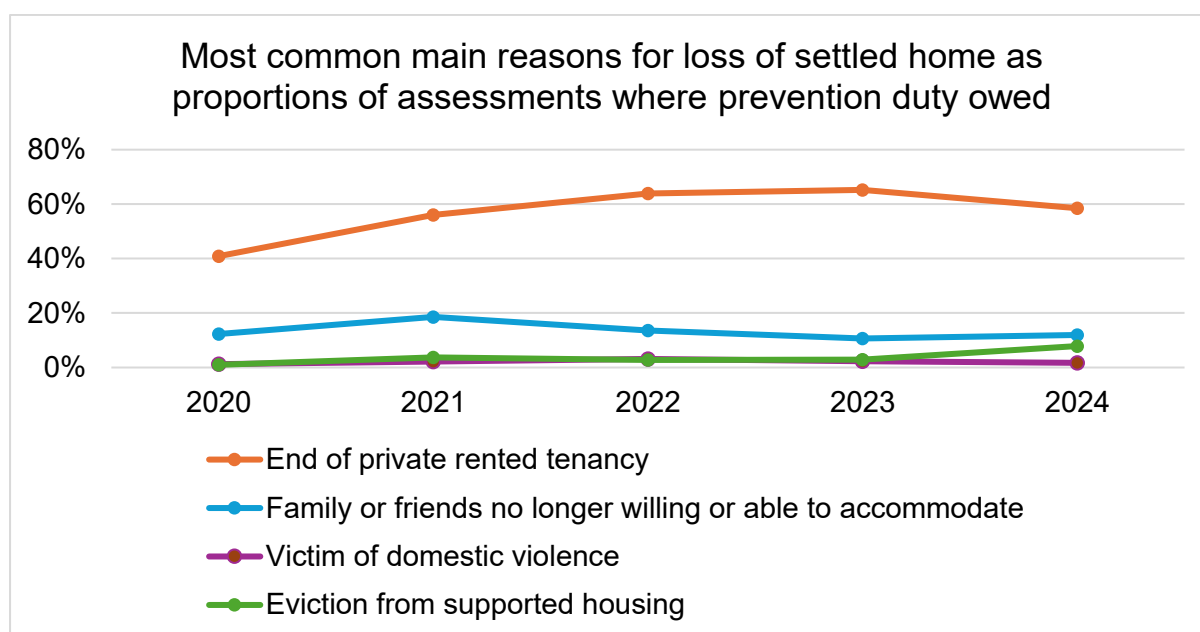
Source: Home Connections (data extracted 13 Jan 2025)



## Reasons for loss of settled home

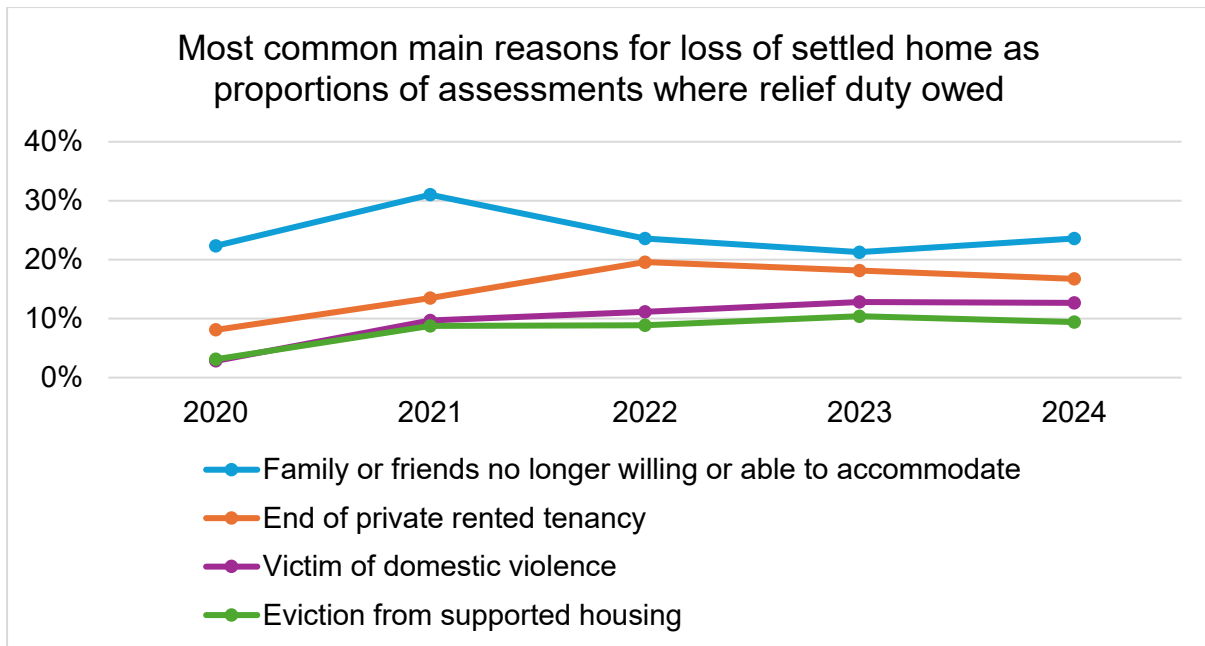
For those households owed a prevention or relief duty, there are four main reasons for loss of a settled home – the end of a private rented tenancy, family or friends no longer willing to accommodate, fleeing domestic violence and eviction from supported housing.

The chart below shows the most common reasons for loss of settled home for those owed a prevention duty by the council. For these households, the most common reason for threatened loss of a settled home was the end of a private rented tenancy. The proportion of cases owed a prevention duty for this reason increased from 41% 2020 to 58% in 2024. Family or friends no longer willing or able to accommodate was the second most common reason.



Source: Home Connections (data extracted 13 Jan 2025)

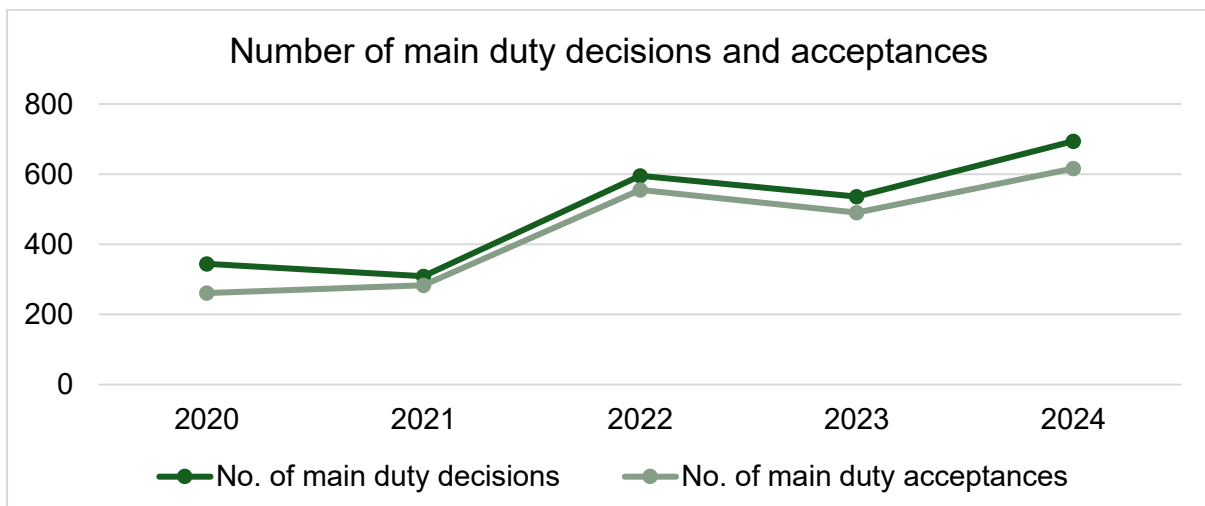
The chart below shows the most common main reasons for loss of settled home for those households owed a relief duty by the council. For households owed a relief duty, the most common reason for loss of a settled home was that family or friends were no longer able to accommodate them. The proportion of cases owed a relief duty for this reason increased slightly from 22% in 2020 to 24% in 2024. End of private rented tenancy was the second most common reason.



Source: Home Connections (data extracted 13 Jan 2025)

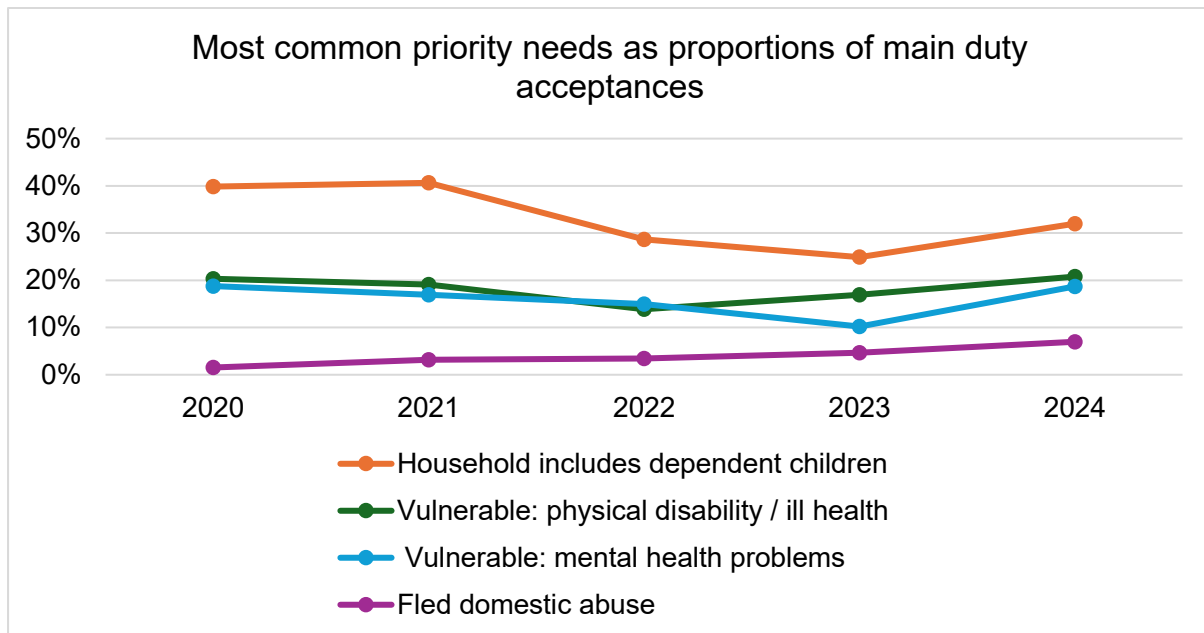
## The main housing duty

If it is not possible to prevent or relieve a household's homelessness, then the council must decide whether the household meets the criteria for the main housing duty. The chart below shows the number of main duty decisions made and acceptances. Most decisions resulted in acceptance. The number of households accepted as being owed a main housing duty has increased since 2020. 261 households were accepted as owed a main duty in 2020. This figure had risen to 616 in 2024, an increase of 136%.



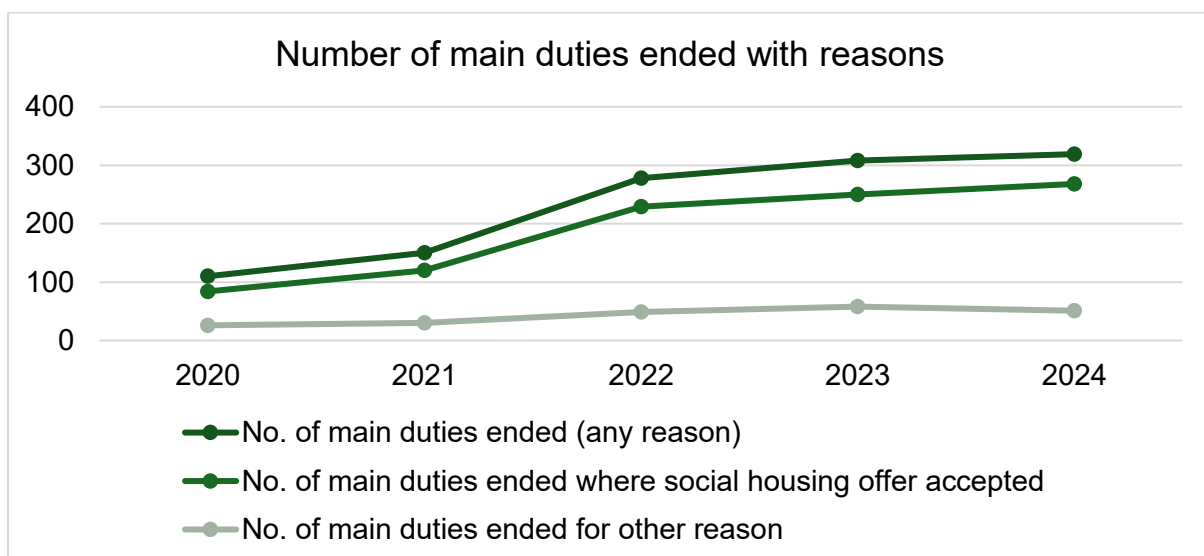
Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the most common priority needs amongst those accepted as owed a main duty. The most common priority housing needs amongst households accepted as owed a main housing duty were because the household included dependent children, physical disability or ill health, mental health problems, domestic abuse. Together these made up 70% of all households accepted as owed a main housing duty in 2024.



Source: Home Connections (data extracted 13 Jan 2025)

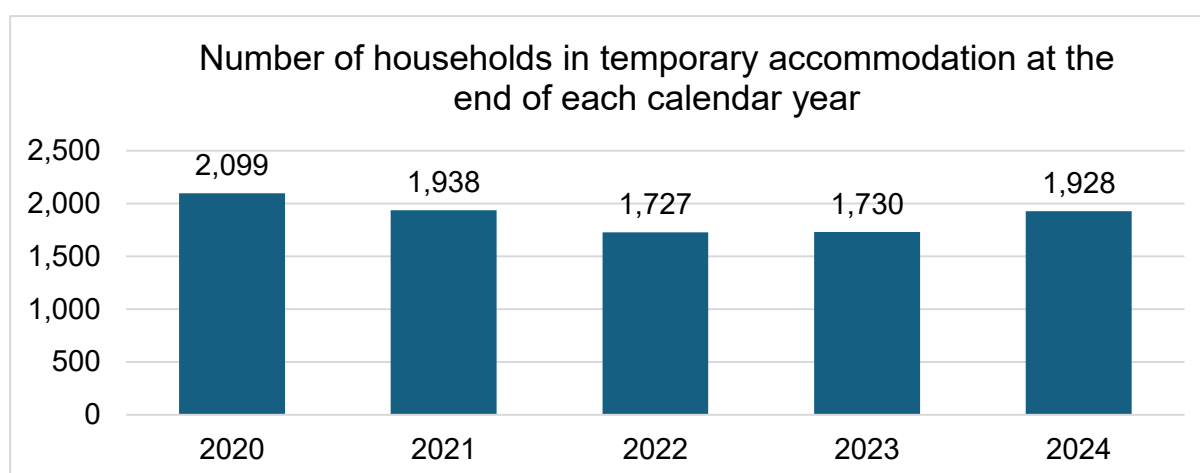
The chart below shows the number of main housing duties ended with reasons. Over the last 5 years around 82% of main duties ended with a social housing offer accepted. This proportion has remained constant even though the number of main duties accepted and ended have increased.



Source: Home Connections (data extracted 13 Jan 2025)

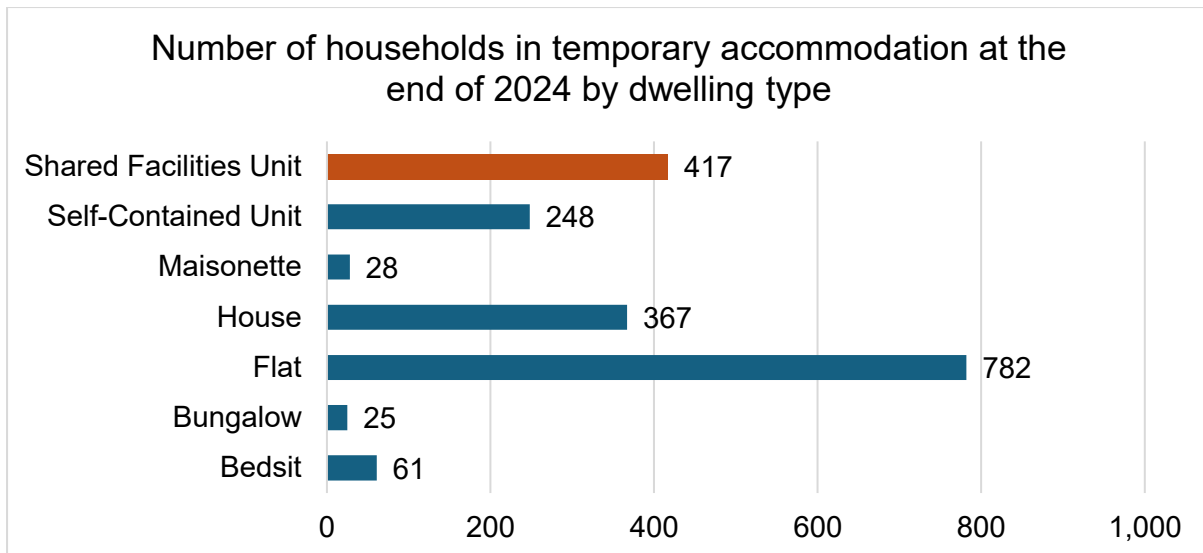
## Households in temporary accommodation

If there is no other accommodation available to a household owed a relief or main housing duty, placement in temporary accommodation by the council is often the only option. Temporary accommodation can include private rented housing, council owned properties, hostels and refuges as well as Houses in Multiple Occupation, B&Bs or hotels. Although there are fluctuations over time, around 1,900 households are living in temporary accommodation at any one time. The chart below shows that after a fall in the number of households living in temporary accommodation between 2020 and 2022, numbers rose in 2023 and 2024.



Source: NEC Housing (data extracted 31 Dec 2024)

The chart below shows the number of households living in temporary accommodation by type of dwelling. All dwelling types have their own washing and cooking facilities apart from those categorised as a 'Shared Facilities Unit'. Most of these are rooms in B&B and hotels. At the end of 2024, 22% of households were in shared facilities accommodation (417 of 1,928) and 78% were in self-contained accommodation (1,511 of 1,928).

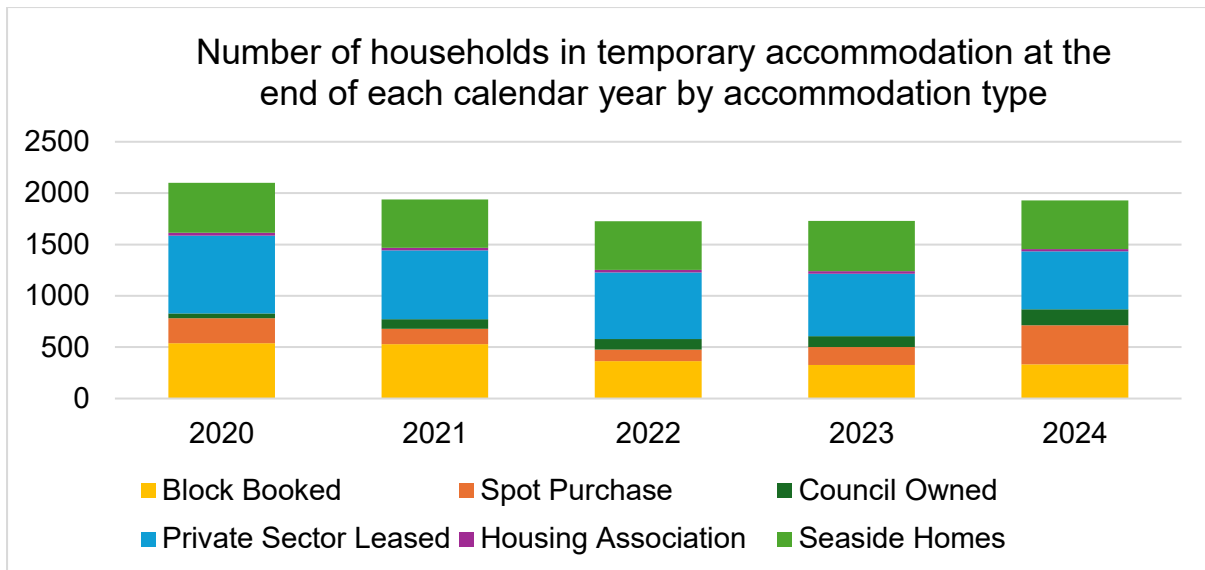


Source: NEC Housing (data extracted 31 Dec 2024)

Broadly speaking, temporary accommodation falls into two categories. The first, historically termed ‘emergency accommodation’, involves interim placement to meet immediate housing needs while a homelessness application is assessed. In the main, these placements are made using two forms of accommodation; block-booked, where units are secured for a fixed period, and spot-purchased, where units are procured in real time on a nightly basis. Spot purchased accommodation is generally the most expensive form of temporary accommodation and often involves placement in hotels, B&Bs or Houses in Multiple Occupation.

Once people are assessed to be owed a housing duty they can be placed in longer term temporary accommodation where they may stay until they secure permanent rehousing. This type of temporary accommodation usually involves use of council owned accommodation or accommodation supplied through longer terms deals with private landlords.

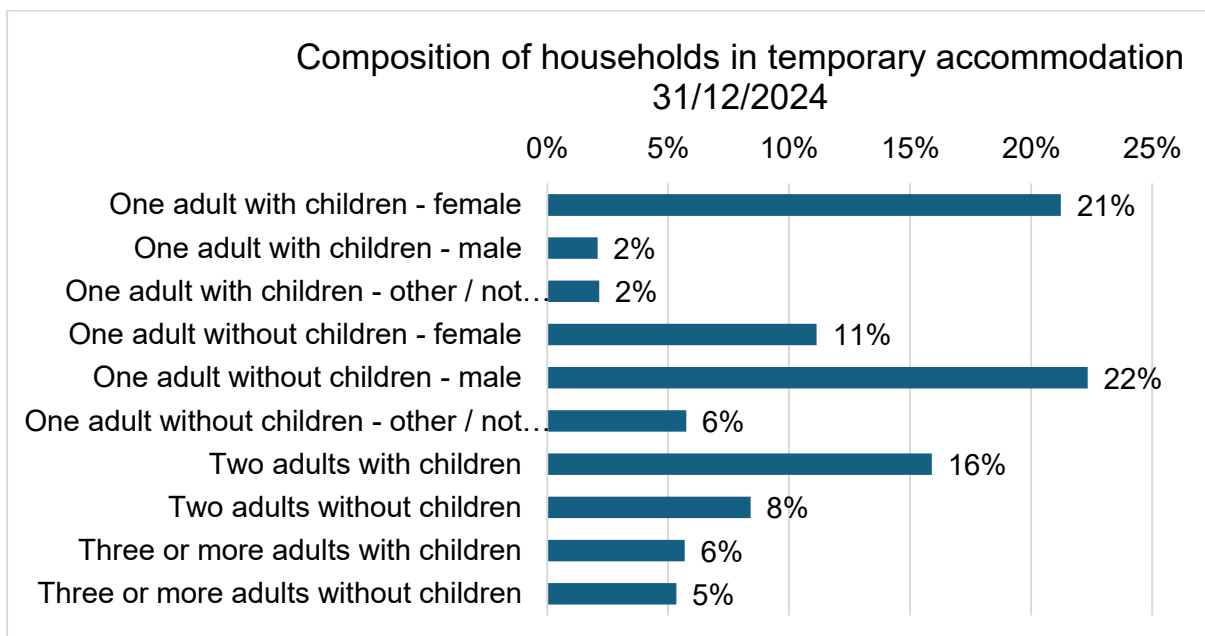
The chart below shows the use of different accommodation types by the council over the last 5 years. After a fall in the number of households placed in ‘spot purchased’ accommodation, the use of spot purchased temporary accommodation rose in 2023 and 2024.



Source: NEC Housing (data extracted 31 Dec 2024)

The cost pressures associated with temporary accommodation are discussed in more detail in the Resources chapter.

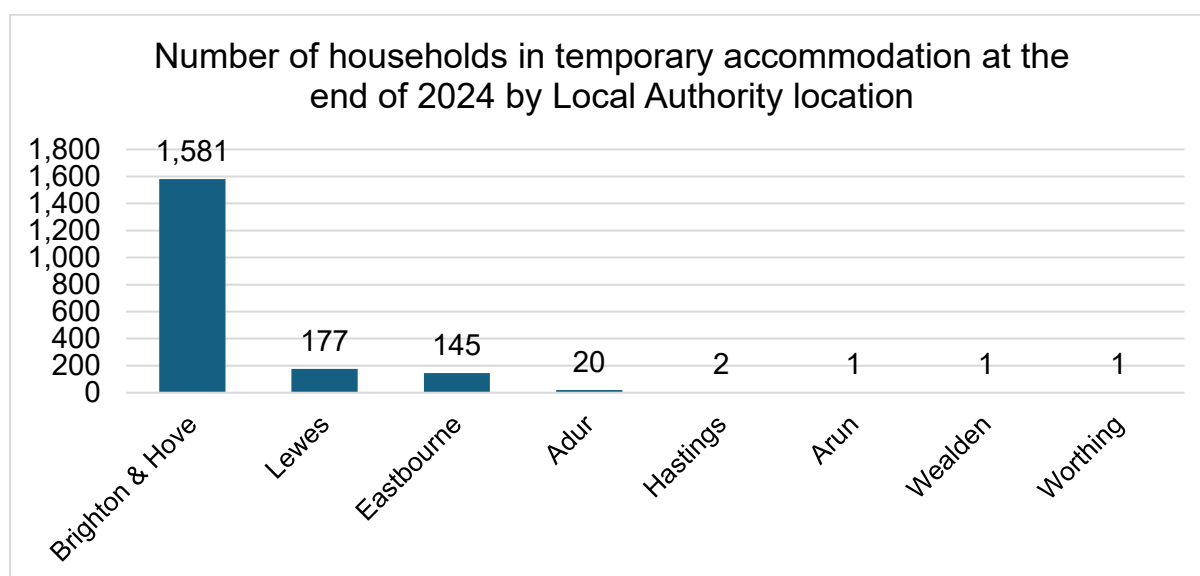
The chart below shows the proportion of households in temporary accommodation by household composition at the end of 2024. At that point 47% of households living in temporary accommodation contained children. Just under half of these consisted of a single female with children. Single male households made up 22% of households in temporary accommodation.



Source: Home Connections (data extracted 10 March 2025)

The chart below shows the location of placements for those living in temporary accommodation sourced by the council. Most households are placed in temporary

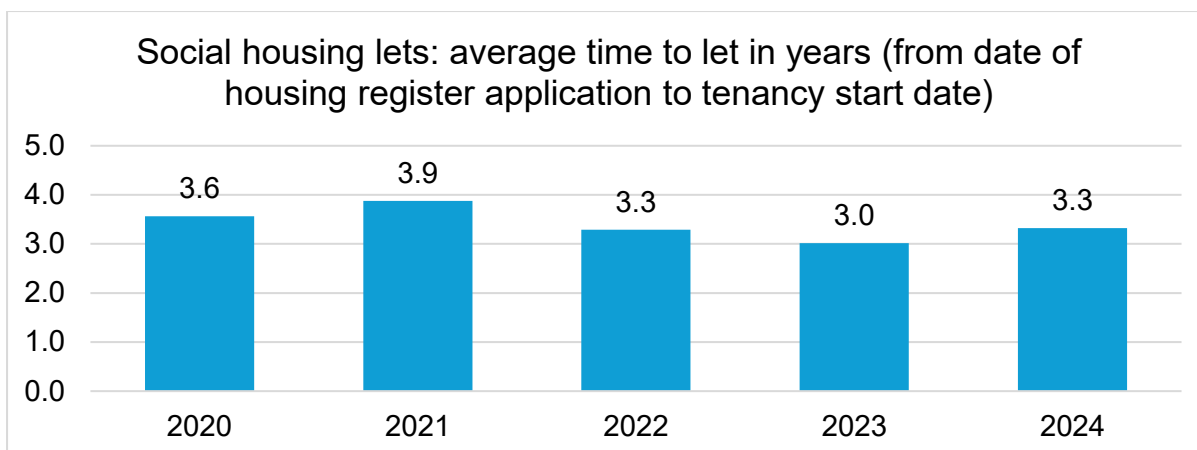
accommodation in the city, but others are placed outside Brighton & Hove. This can be because there was no suitable accommodation available within the city, on grounds of safety or other reasons. Of the 1,928 households living in temporary accommodation at the end of 2024, 1,581 (82%) were placed within the city, with 322 (16.7%) households placed in either Lewes or Eastbourne districts. Smaller numbers were placed elsewhere in East or West Sussex.



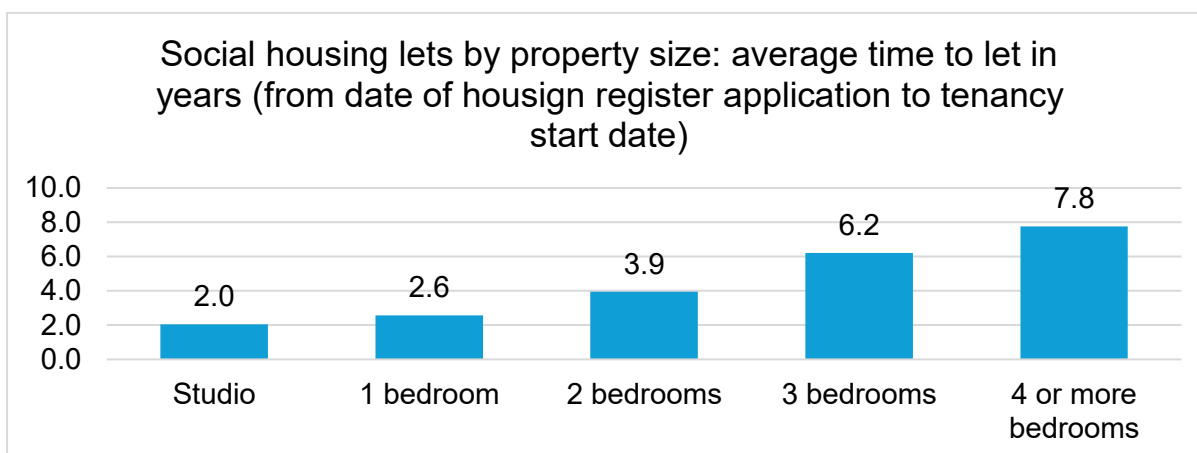
Source: NEC Housing (data extracted 31 Dec 2024)

## Access to settled housing

As noted above, there is an acute shortage of social and private rented sector accommodation in the city. The charts below show the average waits for social housing and the average waits for different type of property. The average waiting time for social housing is around 3.4 years. The wait for a one-bedroom property is 2.6 years. For larger properties, suitable for families with children, the waiting time is much longer. The average wait for a 3-bedroom social rented property is 6.2 years.



Source: Home Connections (data extracted 13 Jan 2025)



Source: Home Connections (data extracted 13 Jan 2025)

## Rough sleeping

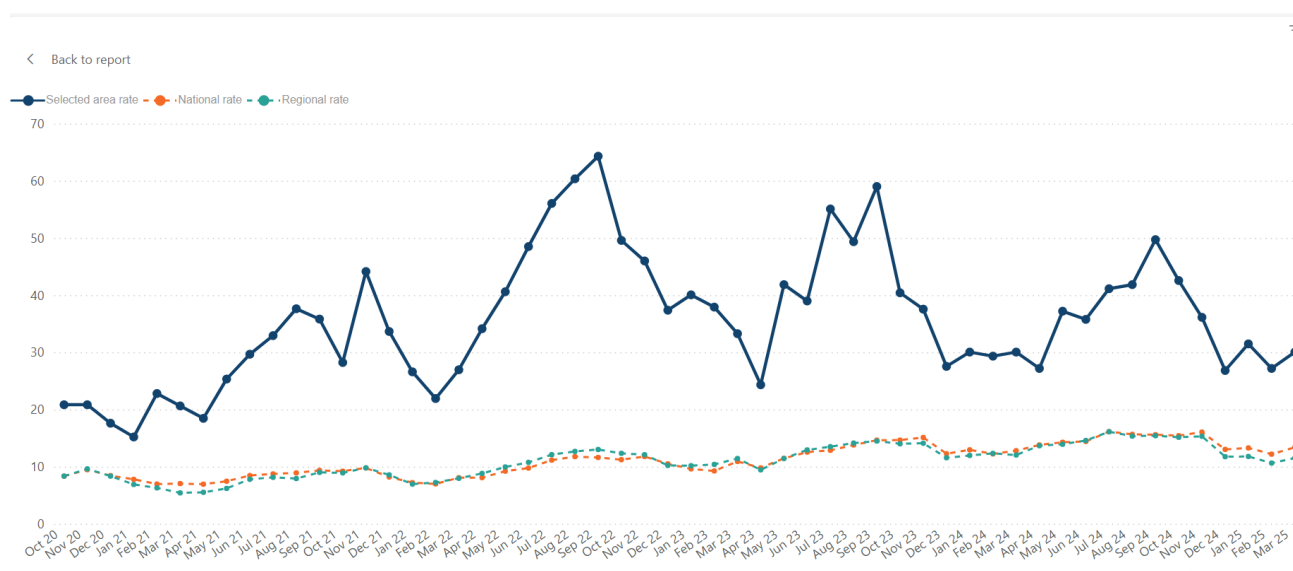
For the purposes of data collection, people sleeping rough are defined as people sleeping, about to bed down or bedded down in the open air (such as on the street, in tents, doorways, parks, bus shelters or encampments). The definition includes people in buildings or other places not designed for habitation (such as stairwells, barns, sheds, car parks, cars, derelict boats, stations or makeshift shelters). The definition of rough sleeping does not include people in hostels or shelters, people in campsites or other sites used for recreational purposes or organised protest, squatters, or travellers.

A snapshot of the number of people sleeping rough on a single night in November is captured as part of a national return each year. The figure for Brighton & Hove for 1 night in November 2024 was 76. The figure each year fluctuates widely with the lowest number recorded in 2010 (n=14) and the highest in 2017 (n=178). Although this figure is widely reported, it is probably not a reliable guide to trends in rough sleeping over time.



More detailed information on rough sleeping is recorded locally and reported as part of the national rough sleeping data framework.<sup>6</sup> This uses more frequent and more detailed information about people sleeping rough to capture the dynamic nature of rough sleeping and better understand the flow of people onto and off the street over the course of a month.

The chart below shows the monthly rates of rough sleeping between October 2020 and March 2025 for Brighton & Hove, the South East and England. An estimated 84 people slept rough in Brighton & Hove during the month of <sup>7</sup> This is a rate of 30.0 per 100,000 people, significantly higher than the average for the South East (11.5) and England (13.38). Alongside Portsmouth, Brighton & Hove had the joint 19<sup>th</sup> highest rough sleeping rate in England. In the South East region, only Eastbourne (30.1), Hastings (45.1) and Reading (46.0) had higher rates. Although the rate of rough sleeping in the city fluctuates, the overall trend is rising in line with national and regional averages, with a rate of 20.0 per 100,000 for Brighton & Hove in October 2020.



Source: [MHCLG: Homelessness statistics](#)

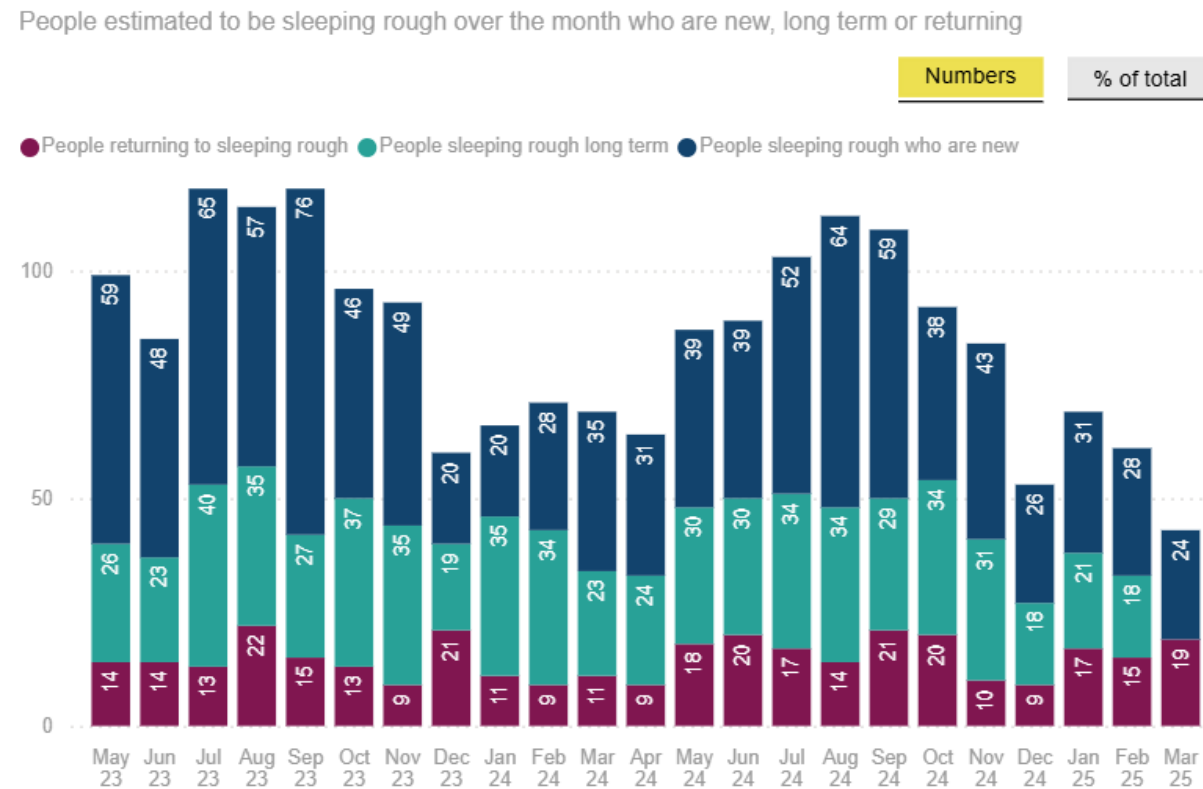
During the month of March 2025, 6 people sleeping rough had left an institution or were care leavers under 25.

Of those sleeping rough in March 2025, 29% were new to rough sleeping (24 of 84). In that month, just under 23% of those sleeping rough were returning to rough sleeping (19 of 84). The chart below shows the number of people sleeping rough who are new, long term or returning to sleeping rough. Although numbers fluctuate, the average number of

<sup>6</sup> Ministry of Housing, Communities and Local Government  
<https://www.gov.uk/government/collections/homelessness-statistics>

<sup>7</sup> Ministry of Housing, Communities and Local Government, *Homelessness statistics*,  
<https://www.gov.uk/government/collections/homelessness-statistics>

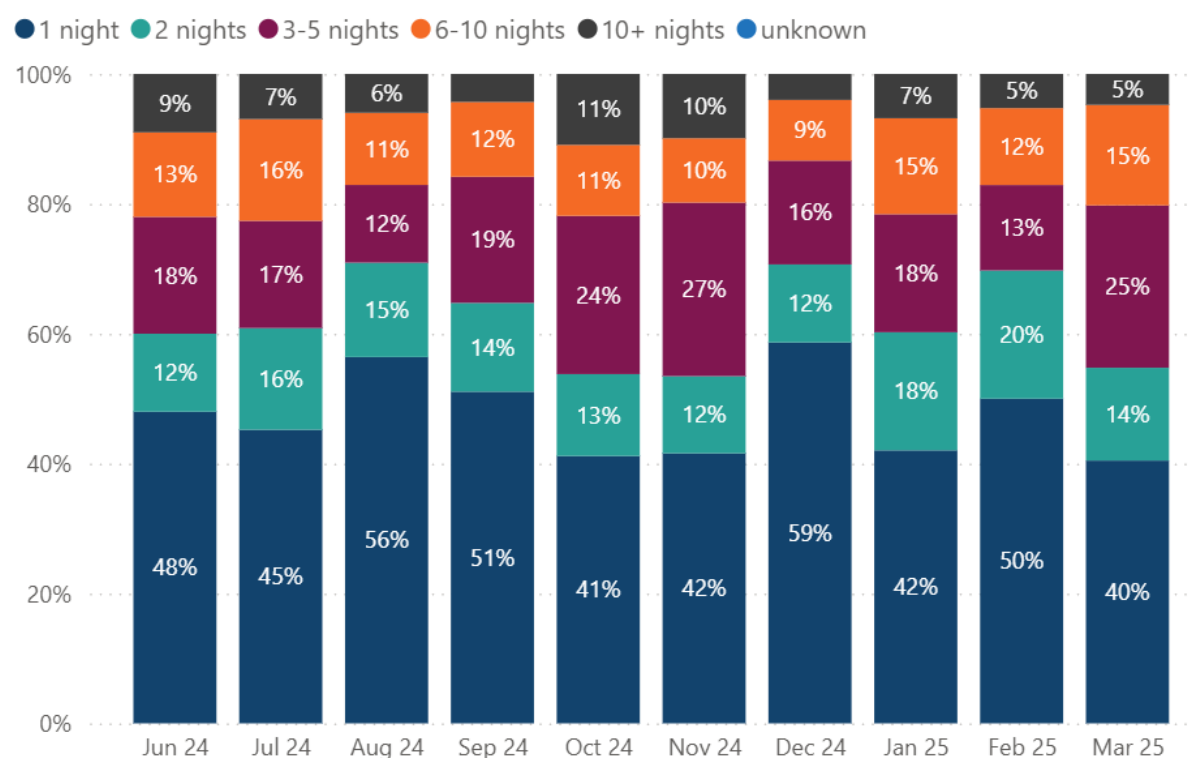
people per month sleeping rough who were sleeping rough long term between May 2023 and March 2025 was 24.



Source: [MHCLG: Homelessness statistics](#)

During the month of March 2025, 40% of people were seen sleeping rough on 1 night, with 5% sleeping rough for more than 10 nights. The chart below shows the proportion of those sleeping rough for 1 night or more in the last 6 months.

Number of nights people seen sleeping rough in the last 6 months



Source: [MHCLG: Homelessness statistics](#)

The annual snapshot captures some data on age, gender and nationality, something not available from the monthly rough sleeping data. Of the 76 people sleeping rough on 1 night in November 2024, 3 (3.9%) were aged 18-25, 70 (92.1%) were 26 and over, (age was not recorded for 3 people). There were no children under 18 years old. Most people sleeping rough were men, with 69 (90.8%) recorded as male and 5 (6.6%) were recorded as female (gender was not captured for 2 people). Nationality was captured for 70 of the 76 people sleeping rough, with 48 (63.1%) recorded as UK nationality, 9 (11.8%) EU nationals, and 13 (17.1%) non-EU nationals.

## Hidden homelessness

The number of households experiencing homelessness is likely to be higher than council and national data shows. Some people do not approach the council for help and there is no consistent or agreed way of capturing the number of those who are experiencing homelessness but who are not recorded in the official figures. The Office

for National Statistics is working to address the challenge of quantifying levels of hidden homelessness.<sup>8</sup> They found that women, young people and people from ethnic minority groups are more likely to be under-represented in official figures.

In 2024, Change Grow Live and Brighton & Hove City Council contributed to the third national women's rough sleeping census.<sup>9</sup> The census looks at women who have 'nowhere safe to stay' rather than just those sleeping rough according to the official definition. The census findings show that women are significantly underrepresented in the official snapshot figures both locally and nationally. The report argues that a lack of visibility means that women are less able to access services and accommodation, and that current policies, strategies and funding models do not recognise or address the true scale and nature of women's rough sleeping.

Findings from the national survey indicated that rough sleeping is rarely a standalone experience for women. Most of them oscillate between rough sleeping and other forms of homelessness, meaning that traditional approaches to addressing rough sleeping and statutory homelessness may be ineffective for women without children in their care.

## Who experiences homelessness?

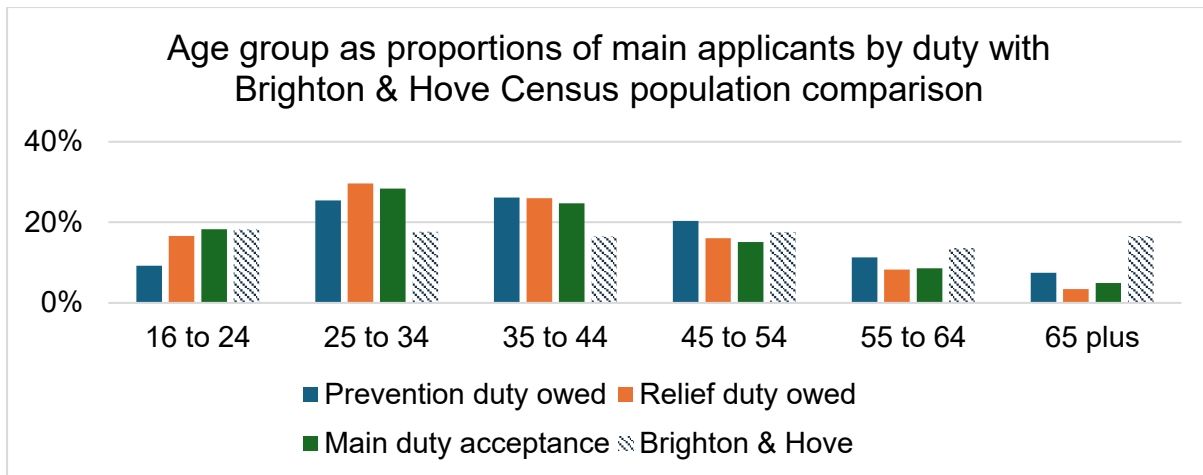
Although homelessness can affect anyone, council data shows that certain groups are more at risk of experiencing homelessness compared with the city's population as a whole. The numbers and proportions given below relate to the period 2020 to 2024.

The chart below shows the age group of main applicants compared with the city population. Between 2020 and 2024, people aged between 25 and 44 were significantly over-represented amongst those owed a prevention, relief or main housing duty compared to the city's population. People over 55 were under-represented.

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<sup>8</sup> Office for National Statistics, 2023, *"Hidden" homelessness in the UK: evidence review*  
<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/articles/hiddenhomelessnessintheuk/evidencereview/2023-03-29>

<sup>9</sup> Solace, 2024, *How do we sleep at night? Women's rough sleeping census 2024*  
<https://www.solacewomensaid.org/womens-rough-sleeping-census/>



Source: Home Connections (data extracted 13 Jan 2025)

Children (aged 0-17) are usually part of households where the main applicant is an adult. This means that they are not captured in the time series data on main applicants (with the exception of 16-17 year olds where they are the main applicant). Data on the numbers of children in temporary accommodation is only available from 31 March 2024, so it is not possible to identify a trend in numbers. From the data we do have, it is clear that children are significantly over-represented amongst those experiencing homelessness in the city. Shelter estimated that there were 1,411 children in Brighton & Hove experiencing homelessness on 30 June 2024. This figure was 39.4% of the 3,580 people they estimated to be experiencing homelessness on that date.<sup>10</sup> At the Census 2021 children made up 17.1% of the city's population.<sup>11</sup>

47% of the households living in temporary accommodation at the end of December 2024 had children. The rate of households with children living in temporary accommodation in Brighton & Hove was 5.73 per 1000 households. This is higher than the national rate of 3.5 per 1000 households.

National evidence indicates that homeless young people may be underrepresented in official statistics.<sup>19</sup> The table below shows the number of main applicants aged 16 to 24 at time of application. While the number assessed as owed a prevention or relief duty have remained broadly stable over the last 5 years, the number accepted as owed a main housing duty has more than doubled.

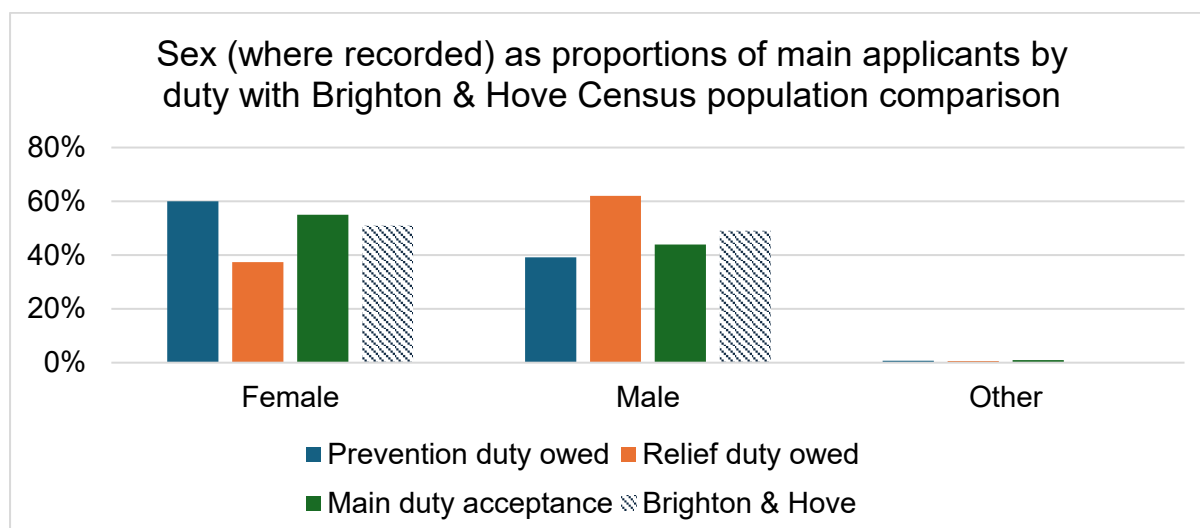
<sup>10</sup> Ministry of Housing, Communities & Local Government, Homelessness statistics, <https://www.gov.uk/government/collections/homelessness-statistics#statutory-homelessness>

<sup>11</sup> Census 2021

Number of main applicants aged 16 to 24 per year	Prevention duty owed	Relief duty owed	Main duty acceptance
2020	50	231	52
2021	27	175	48
2022	41	174	98
2023	58	172	89
2024	79	203	116

Home Connections (data extracted 13 Jan 2025)

The chart below shows recorded sex of main applicants by duty compared with the population of the city. Women comprised 51% of the population at the 2021 Census. Between 2020 and 2024, women made up 60% of those owed a prevention duty, 37% of those owed a relief duty and 55% of those owed the main housing duty. A greater proportion of men (62% compared with 49% of the city's population) were owed a relief duty by the council.<sup>12</sup>



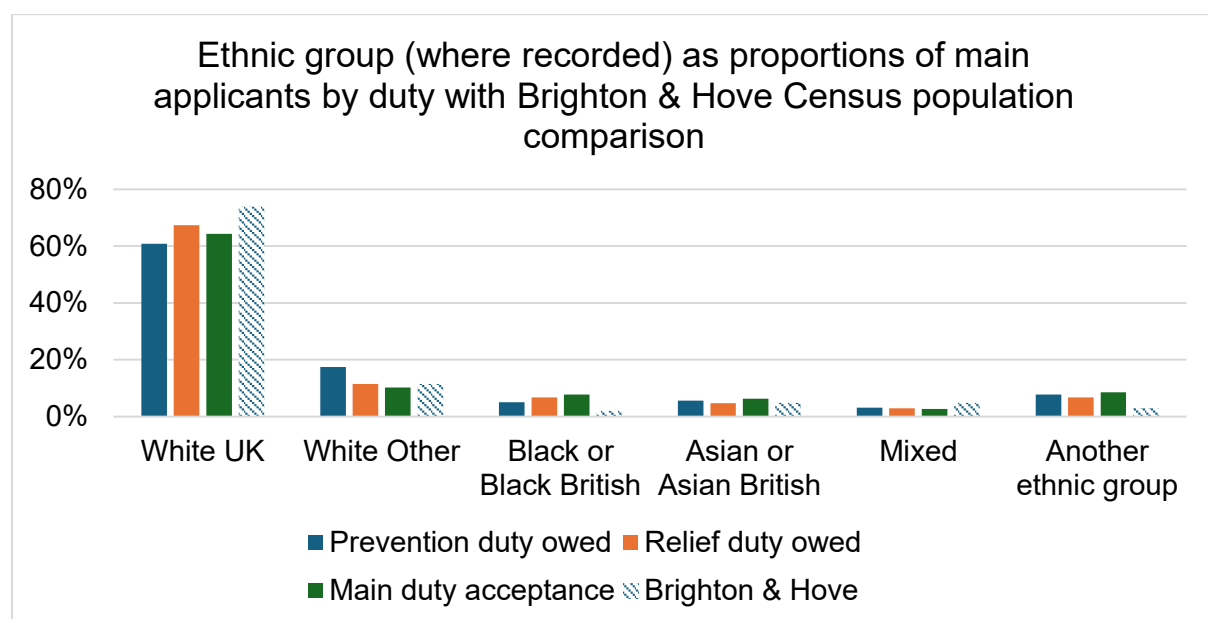
Source: Home Connections (data extracted 13 Jan 2025)

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. Data is collected by the council on gender identity using the question 'Is your gender the same as the sex you were registered at birth?'<sup>13</sup> The number of people who responded to this question is low. Between 2020 and 2024, of those who, 26 were owed a prevention duty, 71 were owed a relief duty, and 35 were owed a main housing duty.

<sup>12</sup> Both the council's data recording system and the Census ask, 'What is your sex?'. The target concept of the question in the Census is sex as recorded on legal/official documents.

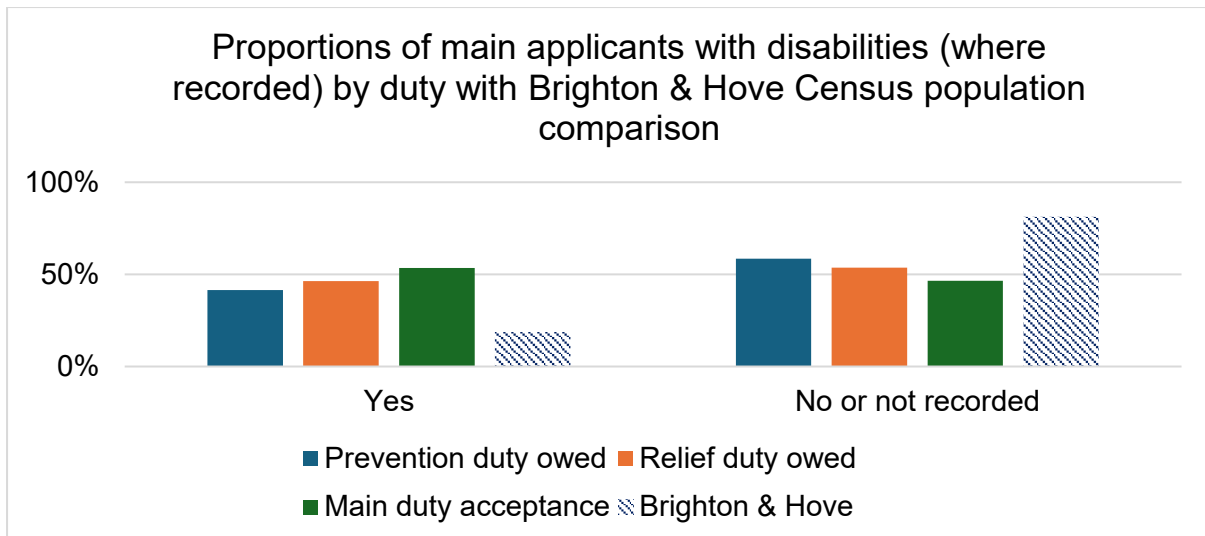
<sup>13</sup> This is similar to the UK Census 2021 question 'Is the gender you identify with the same as your sex registered at birth?'

The chart below shows ethnic group of main applicants as proportions compared with the overall population of Brighton & Hove by duty owed. Between 2020 and 2024, people of White UK ethnic background made up 61% of those owed a prevention duty, 67% of those owed a relief duty, and 64% of those owed the main housing duty. This group comprises 71% of the population of the city at the 2021 Census. People from White Other ethnic groups were over-represented amongst those owed a prevention duty compared to the city's population (17% compared to 12%). People from Black and Black British ethnic backgrounds are overrepresented amongst those owed all three duties by the council. These ethnic groups comprise 2% of the population of the city but 5% of those owed a prevention duty, 7% of those owed a relief duty and 8% of those owed a main housing duty.



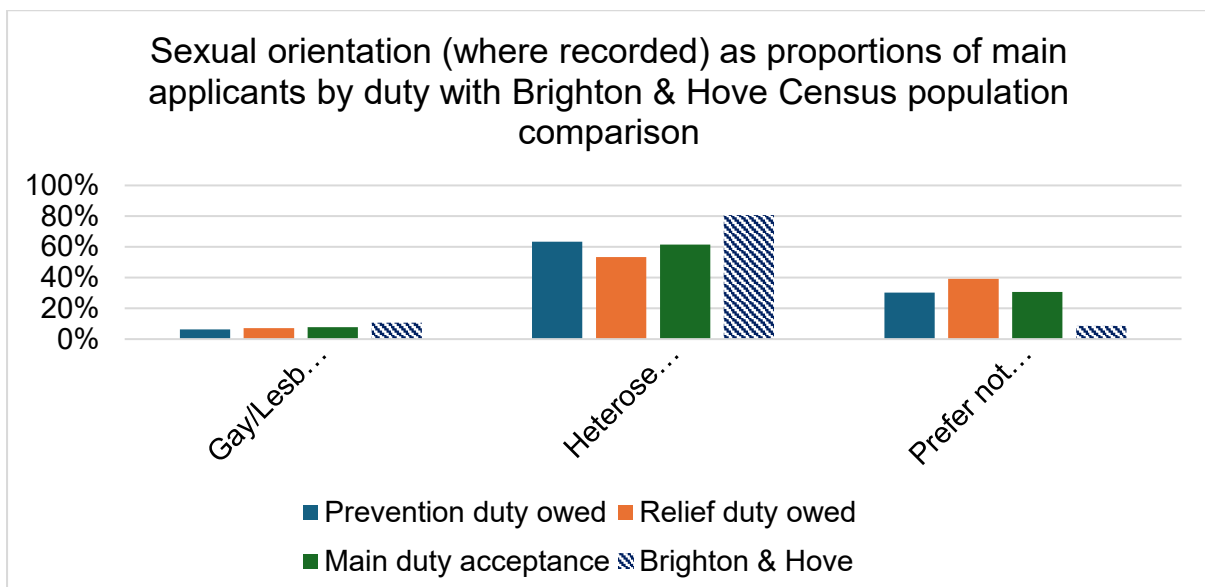
Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the proportions of main applicants recorded as having disability related support needs compared with the overall population of Brighton & Hove by duty owed. This includes people with physical ill health or disability, people with a history of mental health problems and people with learning disabilities. Disabled people comprised 19% of the city's population at the 2021 Census. Disabled people are significantly overrepresented amongst those owed all 3 duties. Between 2020 and 2024, disabled people made up 42% of those owed a prevention duty, 46% of those owed a relief duty, and 54% of those owed a main housing duty.



Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the proportions of recorded sexual orientation of main applicants by housing duty. Between 2020 and 2024, people who identified as Lesbian, Gay, Bisexual or Other sexual orientation assessed as owed a housing duty were underrepresented compared to the population of the city as a whole. They made up of 6% of those owed a prevention duty, 7% of those owed a relief duty, and 8% of those owed a main housing duty. People recorded as Lesbian, Gay, Bisexual or Other sexual orientation comprised 11% of the city's population at the 2021 Census.

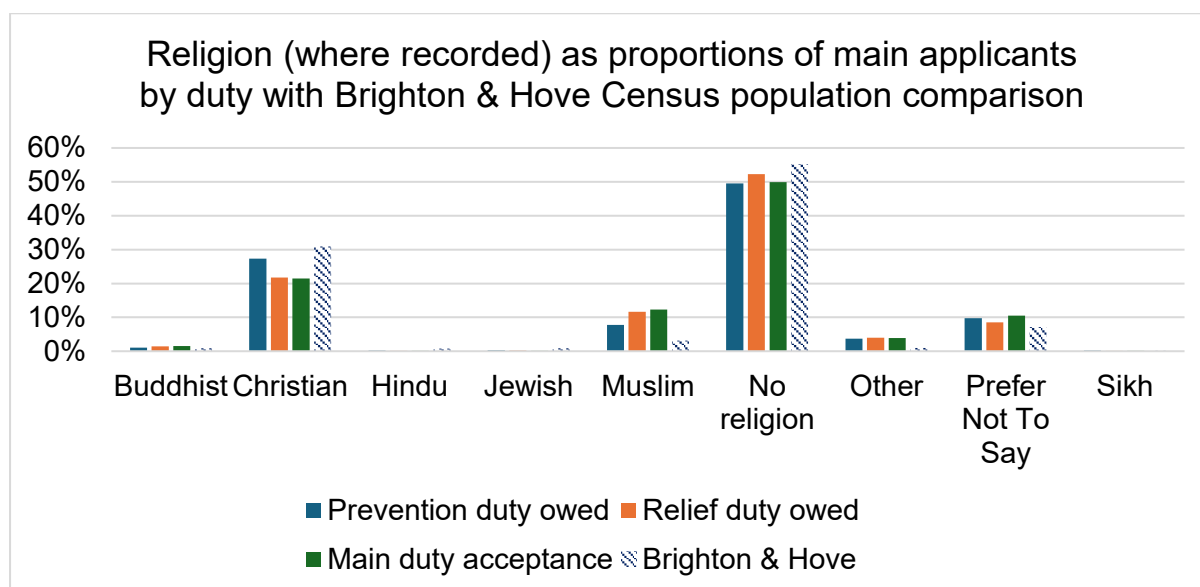


Source: Home Connections (data extracted 13 Jan 2025)

The chart below shows the recorded religion of main applicants by housing duty. People whose religion was recorded as Muslim were significantly overrepresented. They made up 8% of those owed a prevention duty, 12% of those a relief duty and 12% of those



owed a main housing duty. People recorded as Muslim comprised 3% of the population of the city at the 2021 Census.



Source: Home Connections (data extracted 13 Jan 2025)

The numbers and proportions of people owed a duty who are at risk of or who have experienced domestic abuse, sexual abuse or who are victims of modern slavery can be found in the tables on support needs in the next section. In 2024, 6% of those owed a prevention duty, 12% of those owed a relief duty and 16% of those owed a main duty were at risk of or had experience domestic abuse.

The table below shows the employment status of the main applicant over 5 years from 2020 to 2024. For all 3 housing duties a significant proportion of applicants were either registered unemployed or not working because of long term sickness or disability.

Employment status of main applicant	Prevention duty owed	Relief duty owed	Main duty acceptance
At home/not seeking work (including looking after the home or family)	5%	3%	7%
Don't know / Refused	4%	9%	5%
Full-time student	1%	1%	1%
Not registered unemployed but seeking work	2%	3%	2%
Not working because of long term sickness or disability	21%	24%	26%
Other	1%	2%	1%
Registered employed but currently off work due to ill health / disability on reduced or SSP	1%	1%	1%
Registered employed but currently off work on maternity/paternity/adoption leave on reduced or statutory pay	1%	0%	1%
Registered unemployed	25%	39%	31%
Retired (including retired early)	5%	2%	4%
Training Scheme / apprenticeship	0%	0%	0%

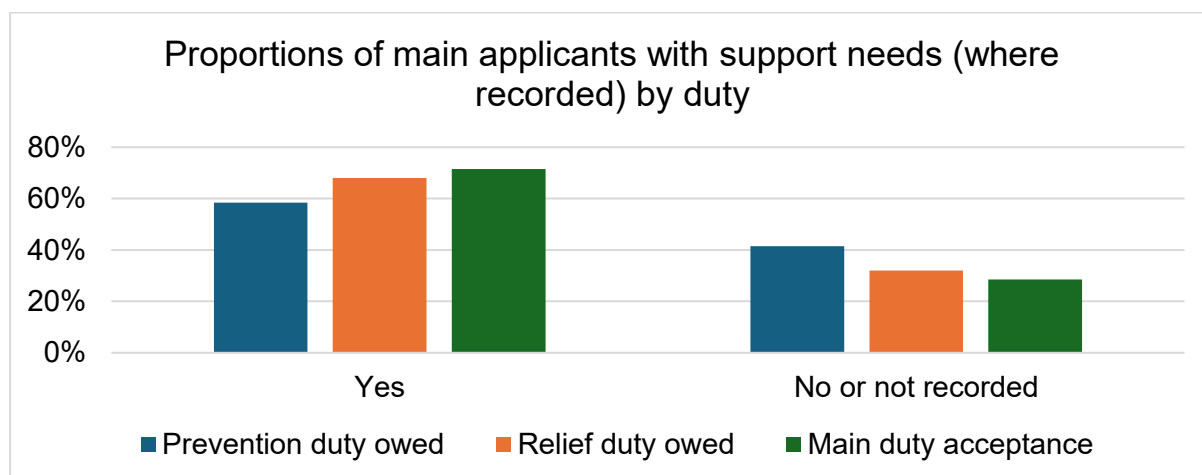
Working: 30 hours a week or more (contracted, regular or guaranteed)	13%	6%	7%
Working: irregular hours with variable or irregular pay	2%	1%	1%
Working: less than 30 hours a week (contracted, regular or guaranteed)	17%	6%	11%
Not recorded	2%	2%	2%

Source: NEC Housing (data extracted 31 Dec 2024)

Data on other characteristics, including protected characteristics, are recorded as support needs in the section below. Whilst some characteristics are in themselves predictive of risk or vulnerability, it is clear that these characteristics intersect with each other and with life events such as loss of employment, relationship breakdown or ill health to heighten risk and vulnerability.

## Support needs of people experiencing homelessness

Of those assessed as owed a housing duty by the council, most had one or more support needs. Support needs were recorded for 58% of those owed a prevention duty, 68% of those owed a relief duty and 71% of those owed a main duty.



Source: Home Connections (data extracted 13 Jan 2025)

The table below shows the recorded support needs of main applicant in households owed a housing duty by the council in 2024. Applicants may have more than one support need, so these categories overlap. For those households owed a relief duty, and therefore likely to be placed in temporary accommodation, the 5 most common support needs were 'history of mental health problems' (35% of those owed a relief duty), 'physical ill health and disability' (22%), 'drug dependency needs' (12%), 'At risk of/has experienced domestic abuse' (12%) and 'Alcohol dependency needs' (10%). The support needs of other members of the household are not recorded.

Support needs (overlapping categories)	Prevention duty owed	Relief duty owed	Main duty accepted
Access to education, employment or training	87	96	30
Alcohol dependency needs	100	574	148
At risk of/has experienced abuse (non-domestic abuse)	53	224	95
At risk of/has experienced domestic abuse	170	707	351
At risk of/has experienced sexual abuse/exploitation	51	199	78
Care leaver aged 18-20 years	8	72	33
Care leaver aged 21+ years (Retired)	8	74	20
Difficulties budgeting	187	133	55
Drug dependency needs	115	717	160
Former asylum seeker	58	163	72
History of mental health problems	737	2,020	816
History of repeat homelessness	81	515	104
History of rough sleeping	46	500	75
Learning disability	109	266	121
Offending history	73	605	118
Old age	95	74	43
Physical ill health and disability	628	1,238	659
Served in HM Forces	3	18	3
Victim of modern slavery	8	21	7
Young parent requiring support to manage independently	20	47	35
Young person aged 16-17 years	8	14	4
Young person aged 18-25 years requiring support to manage independently	74	278	111

Source: Home Connections (data extracted 13 Jan 2025)

## Health and homelessness

Ill health can be both a cause and a consequence of homelessness. We know from national research that people experiencing homelessness have poorer physical and mental health than the general population.<sup>14</sup> Avoidable and unfair differences in health are more likely the longer a person experiences homelessness. Experiencing homelessness also impacts how people access health services. Health inequalities between those experiencing homelessness and the general population are due to a range of systemic, social, practical and administrative barriers.

Homeless Link, in their 2021 national survey of 2,776 people experiencing homelessness, found that:

- 63% had a long-term illness, disability or infirmity

<sup>14</sup> Homeless Link, 2022, *Unhealthy State of Homelessness 2022* <https://homeless.org.uk/knowledge-hub/unhealthy-state-of-homelessness-2022-findings-from-the-homeless-health-needs-audit/>

- 82% had a mental health diagnosis
- 45% reported self-medication with drugs or alcohol to help them cope
- 97% reported registration with a GP or homeless healthcare centre
- 53% were registered with a dentist
- 48% reported use of A&E services in the last year - three times more than the general population
- 38% had been admitted to hospital in the past 12 months
- 37% of hospital admissions related to a physical health condition, and 28% related to a mental health condition, self-harm or attempted suicide
- Of those admitted to hospital nearly a quarter (24%) had been discharged to the streets
- 33% of respondents reported that on average they eat only one meal a day

A review by the Local Government Association reported that a third of those sleeping rough are not registered with a GP and have an Accident and Emergency attendance rate eight times higher than the general population.<sup>15</sup>

National data from the Office for National Statistics indicate that in 2021 there were an estimated 741 deaths of people experiencing homelessness in England and Wales.<sup>16</sup> Most of these deaths occurred in men (87.3%). Almost 2 in 5 deaths (35%) in homeless people were related to drug poisoning. There were an estimated 99 suicide deaths and 71 alcohol-specific deaths, accounting for 13.4% and 9.6% of deaths respectively. The average age of death for men in this cohort was 45 years and 43 years for women. This is compared to 77 years for men and 81 years for women in the general population.

The last comprehensive audit of the health needs of people experiencing homelessness in Brighton & Hove was undertaken in 2014.<sup>17</sup> The sources cited below contain more recent data and evidence.

The [Health Counts 2024](#) survey was conducted by Brighton & Hove City Council and the University of Brighton. Of the 16,729 people who responded, 0.9% (n = 161) reported living in 'temporary or emergency accommodation'. Examples given in the survey of this

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<sup>15</sup> Local Government Association, 2017, *The Impact of Homelessness on Health: A Guide for Local Authorities*

[https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS\\_v08\\_WEB\\_0.PDF](https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF)

<sup>16</sup> Office for National Statistics, Deaths of homeless people in England and Wales: 2021 registrations <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/deathsofhomelesspeopleinenglandandwales/2021registrations>

<sup>17</sup> Brighton & Hove City Council, 2014, *Brighton & Hove Homeless Health Needs Audit* <https://www.brighton-hove.gov.uk/files/sites/bhconnected/files/Brighton%20and%20Hove%20Homeless%20Health%20Needs%20Audit%20FINAL.pdf>

type of accommodation included ‘shelter, sofa surfing, and bed & breakfast accommodation’. Trend data are not available.

Health Counts data show that there are significant health inequalities across a broad range of health and social issues affecting people living in temporary accommodation. The report found that those living in temporary and emergency accommodation were less likely to report being in good health than the population of the city overall. They were more likely to report poor mental health and unhealthy lifestyle behaviours. They were also more likely to report being fairly or very worried about their housing conditions (including damp, cold and leaks) and feeling unsafe or unsupported in their homes and local area when compared with the general population.

The tables below show that those living in temporary or emergency accommodation were more likely to report a range of issues indicating poor health and less likely to report factors that protect health. The % figures are for temporary and emergency accommodation compared with the general population.

<b>Health and disability</b> <ul style="list-style-type: none"> <li>•be a <b>disabled</b> adult (67% vs. 37%)</li> <li>•report <b>anxiety</b> (72% vs. 38%)</li> <li>•have <b>self-harmed</b> in the last 12 months (20% vs. 9%)</li> <li>•have <b>thought of taking their own life</b> in the past 12 months, even though they wouldn't actually do it (48% vs. 25%) or have ever <b>made an attempt to take their own life</b> (24% vs. 12%)</li> <li>•<b>never visit the dentist</b> (29% vs. 10%)</li> </ul>	<b>Lifestyle</b> <ul style="list-style-type: none"> <li>•<b>smoke</b> (47% vs. 17%)</li> <li>•<b>binge drink</b> daily or almost daily (7.3% vs. 2.4%)</li> <li>•to have <b>used drugs</b> that were not prescribed for them and were not available at a chemist/pharmacy in the last year (35% vs. 20%)</li> <li>•experience <b>gambling</b> related harm (62% vs. 19%)</li> <li>•have done <b>less than 30 minutes of sport or fitness activity</b> in the last week which raised their breathing rate (64% vs. 53%)</li> </ul>	<b>Safety and social support</b> <ul style="list-style-type: none"> <li>•feel very or a bit <b>unsafe</b> at night (60% vs. 34%)</li> <li>•feel very or fairly <b>worried about physical violence</b> against themselves (36% vs. 22%)</li> <li>•to be fairly or very <b>worried about housing conditions</b> such as damp, cold and leaks (56% vs. 21%)</li> <li>•to be fairly or very <b>worried about being sexually assaulted/raped</b> (34% vs. 21%)</li> </ul>
<b>Health and disability</b> <ul style="list-style-type: none"> <li>•report being <b>in good or better health</b> (33% vs. 69%)</li> <li>•<b>clean their teeth</b> twice a day (or more) (66% vs. 75%)</li> </ul>	<b>Lifestyle</b> <ul style="list-style-type: none"> <li>•eat five or more portions of <b>fruits or vegetables</b> (37% vs 49%)</li> <li>•spend <b>free time in nature</b> at least monthly (79% vs 89%)</li> </ul>	<b>Safety and social support</b> <ul style="list-style-type: none"> <li>•have a very or fairly strong <b>feeling of belonging</b> to their local area (35% vs. 53%)</li> <li>•<b>if ill in bed and need help, have someone they could ask</b> (51% vs. 70%)</li> <li>•feel very or fairly <b>satisfied with the local area</b> as a place to live (55% vs. 81%)</li> </ul>

The [Brighton & Hove Multiple Complex Needs JSNA 2020](#) reported particularly poor health outcomes in those experiencing homelessness with other compounding needs, particularly mental health needs and substance use issues. Changing Futures Sussex publish a quarterly audit of people with multiple compound needs in contact with

homelessness and housing services in Brighton & Hove.<sup>18</sup> People with multiple compound needs experience some of the poorest health outcomes of any population group. The term multiple compound needs (MCN) is defined by the national Changing Futures programme as three or more of homelessness, substance misuse, mental health issues, domestic abuse, and contact with the criminal justice system.<sup>19</sup>

The Q4 2024/25 audit report provides information about co-occurring needs alongside homelessness including mental and physical health, substance misuse, domestic abuse, history of offending and whether people are accessing support for their needs. 1909 individuals are represented in the audit of data supplied by 27 support providers. 37% clients (n = 704) were experiencing homelessness. Of this group:

- 88% were experiencing mental health needs
- 77% were experiencing substance use issues
- 53% had historic or current involvement in the criminal justice system
- 44% had a physical health need
- 31% were affected by domestic abuse
- 59% were homeless with 2 other needs; 33% were homeless with 3 other needs; and 8% were homeless with 4 other needs
- Most were male (67%), White British and aged between 35-44 years
- 88% were registered with a GP

A 2025 internal audit of deaths in temporary and supported housing conducted by Brighton & Hove City Council found that most deaths were due to overdose, cardiac arrest, suicide and chronic illness, with an average age at death of 48 years.

An audit of drug deaths in the city in 2024 found that many of those who died experienced multiple compound needs as well as unemployment, poor or insecure housing, insecure or unstable income, financial difficulties, or poor family or social support networks.<sup>20</sup> In the 12 months prior to death, 50% had experienced significant changes in their housing situation – including eviction, concerns regarding cuckooing, prison release, moving to and from Brighton & Hove or moving into student accommodation. Twenty percent were homeless (living in supported, emergency or temporary accommodation, sofa surfing or sleeping rough). Over a third (36%) may have met the criteria for a referral to the Changing Futures programme.

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<sup>18</sup> Changing Futures Sussex, *Brighton & Hove Multiple Needs Audit Reports*, <https://www.changingfuturesussex.org/learning>

<sup>19</sup> Ministry of Housing, Communities and Local Government, *Changing Futures: changing systems to support adults experiencing multiple disadvantage*, 2020  
<https://www.gov.uk/government/publications/changing-futures-changing-systems-for-adults-experiencing-multiple-disadvantage>

<sup>20</sup> Brighton & Hove City Council, 2025, *Audit of Drug Deaths 2024*

Data from Arch Healthcare, a GP practice specialising in healthcare for people experiencing homelessness, indicates that of a practice population of around 1,600 patients:

- Most were male (79% male, 21% female)
- The mean age is 41.6 years
- 80.1% are White, 5% Mixed/Multiple ethnic groups, 4.6% Black/ African/ Caribbean/Black British; 2.8% Asian/Asian British; 2.8% Other ethnic group; 4.6% Unknown
- There are around 40 children registered with the practice
- 54% of patients were coded as having depression, 44% anxiety and 12% PTSD
- 20% were coded as having self-harmed (this is reportedly more common and may not always be coded)
- 28% of patients were coded for substance use, 26% alcohol dependence and 74% were smokers
- 8% were coded as having COPD, 2% Coronary Heart Disease, 8% hypertension, 3% Chronic Liver Disease, 4% have Type 2 Diabetes mellitus and 7% are coded as having chronic pain
- 1% of patients have a code for TB, 2% for HIV, 1% Hepatitis C and 1% Hepatitis B
- In 2024/25, there were 16,807 appointments, with 1,603 people seen and an average of 10.5 appointments per patient

Although this data provides insights, it should be interpreted with caution due to several limitations, including potential under-coding, patients in the dataset representing both those experiencing homelessness and those who have been subsequently housed. We were also unable to assess for comorbidity as the data are for individual counts.

Being frail describes when someone loses their inbuilt reserves and therefore becomes vulnerable to serious adverse outcomes from seemingly minor stressors, such as a move to short term residential placement or a trip to the emergency department.<sup>21</sup>

There is a growing understanding that more people are becoming homeless in later life. Those experiencing homelessness, especially those with multiple compound needs or with a history of rough sleeping, can also experience frailty at a younger age.

In Brighton & Hove, work is being undertaken to improve the identification of frailty in people experiencing homelessness. The Homeless Health and Inclusion team use the Edmonton Frail Scale to identify those who are frail. The main components of frailty in this group relate to malnutrition and mobility issues. The team are then able to organise onward support. Support could include outreach, physiotherapy, occupational therapy, hospital admission avoidance and identifying those who may require end of life care. If frailty is not identified and if chronological age and other issues like substance use are

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<sup>21</sup> British Geriatrics Society, 2014, *Introduction to Frailty* <https://www.bgs.org.uk/introduction-to-frailty>



focused upon, individuals are vulnerable to their needs not being adequately met, including being placed in less suitable accommodation. Quantitative data is not yet available from this work.

There is a lack of local data on the impact on homelessness on the health of children and young people. However, there is a growing body of evidence indicating that serious negative impact on health and other outcomes. Evidence submitted to the Housing, Communities and Local Government Committee in 2024-25 identifies the following common issues for children living in temporary accommodation: overcrowding, poor maintenance, lack of adequate facilities (like a kitchen, laundry and personal hygiene facilities, a desk or table for homework) and serious hazards (damp and mould, excessive cold, pests).<sup>22</sup> Witnesses informed the select committee that poor quality accommodation can result in numerous health conditions including respiratory illness, skin problems, gastro-intestinal illness, high rates of accidents, sleep deprivation, depression and anxiety.

Analysis conducted on behalf of the All Party Parliamentary Group on Temporary Accommodation by the Shared Health Foundation estimates that temporary accommodation has contributed to the deaths of at least 74 children in the last 5 years (58 of these were under 1 year old).<sup>23</sup>

Survey research by Shelter found that 61% of parents living in temporary accommodation felt that temporary accommodation had a negative impact on their children's stress or anxiety; 52% reported that their children's depression has worsened; and 28% said their children were finding it hard to make or keep friends due to living in temporary accommodation.<sup>24</sup> Almost half (47%) of children of those surveyed had to move schools. More than half (52%) of parents reported their children had missed days of school. Of these, more than one in three (37%) have missed more than one month. One in four (26%) parents said their children were unable to keep up or have performed poorly because of living in temporary accommodation.

The Local Government Association also identify a wide range of impacts that growing up in temporary accommodation can have on children and young people.<sup>25</sup> These range

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<sup>22</sup> UK Parliament, House of Commons: Housing, Communities and Local Government Committee, 2025, *England's Homeless Children: The crisis in temporary accommodation* <https://publications.parliament.uk/pa/cm5901/cmselect/cmcomloc/338/report.html#heading-0>

<sup>23</sup> All Party Parliamentary Group: Households in Temporary Accommodation, 2025, *Child Mortality in Temporary Accommodation 2025* <https://sharedhealthfoundation.org.uk/publications/child-mortality-in-temporary-accommodation-2025/>

<sup>24</sup> Shelter, 2022, *Still Living in Limbo: Why the use of temporary accommodation must end* [https://england.shelter.org.uk/professional\\_resources/policy\\_and\\_research/policy\\_library/still\\_living\\_in\\_limbo](https://england.shelter.org.uk/professional_resources/policy_and_research/policy_library/still_living_in_limbo)

<sup>25</sup> Local Government Association, 2017, *The Impact of Homelessness on Health: A Guide for Local Authorities*



from disruption of access to universal healthcare like vaccinations; higher rates of infection and accidents; risk of sexually transmitted infections and unwanted pregnancies; higher rates of stress, anxiety, depression and behavioural issues; poorer educational attainment and attendance; bullying and isolation; increased experience of trauma, abuse and other adverse experiences; higher risk of exploitation, trafficking and involvement in gang or criminal activity.

# Activities and services to address homelessness and rough sleeping

## Services provided or commissioned by the council

The council's homelessness services covering homelessness and housing options and temporary and supported accommodation, are part of Housing People Services within the council's Homes & Adult Social Care directorate.

Broadly speaking, the council's homelessness services offer:

- Housing advice and homelessness prevention
- Allocation of social housing
- Temporary accommodation
- Landlord liaison and housing solutions
- Supported housing and rough sleeper services

For the financial year 2025/26, the total budgeted cost of providing these services is £31.4 million, which is allocated as follows:

- £28m on temporary accommodation
- £2.9 million on housing options and homelessness prevention
- £0.5 million on travellers' services

These figures include funds from the council's own resources and income from rents, charges, and government grants, including the Homelessness Prevention Grant and Rough Sleeping Prevention and Recovery Grant.

## Homelessness and Housing Options

### *Housing advice and homelessness prevention*

For households at risk of homelessness in the next 56 days, the council will try to help people remain in their current home. The things the council may do to help stop someone from losing their home include:

- Information about landlords' responsibility for repairs and maintenance.
- Advice and representation if a landlord or lender have applied to a court for an eviction order.
- Information about unlawful eviction and how landlords must follow the correct legal steps.
- Advice for those living in council housing or who want advice on applying for council housing.
- Advice on benefits and money problems
- Advice on Universal Credit help with housing costs for renters.

- Advice on how to apply for a discretionary housing payment (DHP) if universal credit or housing benefit does not cover someone's full rent.
- Advice on debt respite or 'breathing space' to give someone more time to deal with rent arrears.
- Advice for dealing with priority debts.

The initial point of contact for someone approaching the council for housing advice or support is through the Housing Advice and Triage team. As well as providing advice and information to prevent homelessness, the team process initial homelessness applications and refer these to one of three other teams within the service. These are:

- Homelessness Prevention and Relief
- Pathways and Partnerships
- Housing Allocations

The Housing Advice and Triage team deal with around 3,000 requests for housing advice and process around 1,700 homelessness applications a year.

#### *Support and advice to prevent or relieve homelessness*

Most of those who are assessed as being owed a prevention or relief duty by the council will be referred to the Homelessness Prevention and Relief team. For those who are owed a prevention duty by the council the team will focus on preventing homelessness, either by negotiating with landlords, referring applicants for additional support or linking them with properties in the private sector. However, around 70% of those making a homelessness application present at the relief stage, that is, when they are already homeless. The team will work with these applicants to agree steps that both the applicant and the council will take to secure accommodation. For most, this will mean a placement in temporary accommodation while their application is being processed.

#### *Support and advice for people facing barriers to access or with complex or high levels of need.*

The Pathways & Partnerships team carry out homelessness assessments and prevent or relieve homelessness for people facing barriers to access or who have complex or high levels of need. The team work closely with and take referrals from mental health services (Sussex Partnership NHS Foundation Trust), the Royal Sussex County Hospital, the Probation Service, services for people experiencing rough sleeping, supported accommodation services, young people aged 16-17 and care leavers aged 18-21, and people with multiple compound needs and refugees.

#### *Allocation of social housing*

Social housing is allocated by the Housing Allocation team. If someone is assessed as being owed a main housing duty, the team will assess their housing and support needs and assign them to the housing register – the waiting list for social housing. Given the

long waits for social housing, the team will also support the applicant to access housing in the private rented sector as a route out of temporary accommodation.

## Temporary and Supported Accommodation

### *Temporary Accommodation*

If the council cannot prevent a household from becoming homeless, or if the household is already homeless when they first approach to the council, the council will assess whether the household is eligible and has a priority need for accommodation.

Households who are homeless, eligible and have a priority need are offered temporary accommodation if they have no friends or family they can stay with. They must contribute towards the cost of temporary accommodation with income or Housing Benefit.

Nearly all of the council's temporary accommodation is in Brighton & Hove. However, it is not possible to procure enough temporary accommodation in the city for everyone that needs it, so a small proportion of the council's temporary accommodation is outside the city. Temporary accommodation offered by the council comprises accommodation units within council owned stock, the private rented sector, housing associations, B&B and hostels. The council has 100% nomination rights to units managed by Seaside Homes, an independent charity providing affordable social rented housing in the city.

### *Housing solutions*

The council's Private Rented Sector and Leasing team help people avoid homelessness by securing safe, affordable, and sustainable accommodation in the private rented sector. The service currently works with over 230 landlords across the city. The offer includes property assessment and negotiation, ensuring that homes meet safety and energy standards and negotiating fair tenancy terms. Tenancy establishment supports people with viewings, tenancy agreements, and provides financial assistance such as deposits and rent in advance. Post-move support includes helping people register for benefits, council tax, and utilities, and providing essential furnishings.

The Move On service helps residents transition from temporary accommodation or hosting arrangements into settled housing. As well as supporting people to move on from temporary accommodation, the service assists people in hosting arrangements such as Homes for Ukraine, to formalise a tenancy with their host or to move on from their placement. The service provides tenancy support, financial assistance, and coordination with landlords to ensure successful transition into longer term housing. The service aims to deliver around 300 move-ons from temporary accommodation into the private rented sector and social housing per year. This target is part of a broader strategy to reduce numbers in temporary accommodation and the associated cost pressures for the council.

The council has a dedicated Tenancy Support team who work closely with vulnerable households to help stabilise tenancies and provide practical support. This includes ongoing support with budgeting, benefits, and tenancy responsibilities. Early intervention is triggered if issues arise within a tenancy, helping to prevent breakdowns.

The council also delivers several special projects. Homes for Ukraine supports Ukrainian guests through outreach, advice workshops, and tenancy support, enabling them to formalise arrangements or move into independent housing. Refugee resettlement provides financial packages and tenancy support to help refugees secure and sustain housing through the private rented sector access scheme. AFEO (Accommodation for Ex-Offenders) helps ex-offenders secure settled accommodation through tenancy support and landlord incentives.

During the pandemic, the council delivered the Everyone In programme, housing more households in a single year than at any time previously.

## Commissioned services

Rough sleeping and homeless support services commissioned by the council's Homes & Adult Social Care directorate consist of a range of core and grant funded support and accommodation services delivered by voluntary, community and social enterprise organisations (with the exception of the Off Street Offer delivered directly by Brighton & Hove City Council).

Commissioned services fall into two main categories:

- Community support services which include street outreach, advice and floating support services offering support to people in community venues and their own homes.
- Accommodation based services with differing levels of support from high to low support for various client groups including homeless adults, young people, and families.

## Community Support Services

### *Family Mediation*

Family mediation is a core funded service delivered by YMCA DownsLink Group through the Youth Advice Centre. The service aims to prevent homelessness and support young people to rebuild relationships with their families. Until June 2025 the council also worked in partnership to deliver housing advice for young people through the Youth Advice Centre. The core statutory housing advice service is now delivered in full by the Council. The Youth Advice Centre receive funding separately and continue to provide youth support.

### *Rough Sleeper Street Outreach Service*

The Rough Sleeper Street Outreach Service is a core funded service delivered by Change Grow Live. The service is responsible for identifying new rough sleepers and supporting existing ones. They engage with and assess the needs of people living on the streets and help them access accommodation, support, or with relocation when there is a support network or local connection elsewhere. This service offers a fast route away from the streets and to avoid long-term homelessness.

Change Grow Live also deliver the following grant-funded projects: Assessment & Reconnection Workers, Navigators, the Homeless Outreach Assessment Project (known as The Circle) and Surge Accommodation (The Fab).

### *Navigators*

Navigators is a grant funded intensive support service providing tailored support for people with the most entrenched complex needs who have a history of repeat rough sleeping. The team support clients to move off the streets and to maintain accommodation, as well as linking them to support services, including mental health and drug and alcohol support. The service is due to merge with the Changing Futures team during 2025/26 to deliver a more focused multi-disciplinary approach for people who have a history of long-term rough sleeping, multiple compound needs and social exclusion.

### *First Base Day Centre*

First Base is delivered by Brighton Housing Trust and offers a range of services to support people who are sleeping rough or are insecurely housed in the city. These include food, showers, lockers and laundry facilities, case work support, accommodation and relocation services, as well as access to health services and employment and learning support. First Base hosts a range of external organisations and health workers who use it to engage with people sleeping rough. Grant funding from the council funds two full-time equivalent staff members who work to relocate those with no local connection if there is a support network or local connection elsewhere.

### *Homeless Recovery Service*

The Homeless Recovery Service is funded through Brighton & Hove City Council's Public Health Grant and delivered by Change Grow Live. It has around 250 service users. It offers recovery focused drug and alcohol support to people who are homeless in the city.

### *Accommodation based support services for young people*

The council's Homes & Adult Social Care directorate commission a variety of accommodation-based services designed specifically for vulnerable young people aged 16 to 25.

Young people using these services often require support with mental health challenges and complex needs, frequently stemming from rejection and other adverse childhood experiences. These services are expected to be creative and flexible, operating within a framework of personalised, trauma-informed care.

Support is delivered in collaboration with social care services and other specialist agencies working with this age group. A mix of one-to-one and group programmes help young people to develop positive social connections, daily living skills, access to work, learning and leisure activities.

### *Sussex Nightstop*

Sussex Nightstop is a core funded service offering emergency accommodation for young people aged 16-25 who are homeless (including sofa-surfing) or at risk of homelessness in welcoming homes with vetted and trained volunteer hosts. The service also offers support, guidance, and access to other service and information to help young people to return home or secure alternative accommodation.

### *Brighton & Hove Foyer*

Sanctuary Supported Living deliver the core funded Brighton & Hove Foyer. This supported housing scheme offers 50 units of accommodation and support for young people in 2-to-3-bedroom shared flats. The service includes 30 medium-support bedspaces and 20 low-support bedspaces. With staff available 24 hours a day, assistance is individually tailored, preparing residents for independent living.

### *YMCA DownsLink Group*

With core funding from the council, YMCA DownsLink Group provide accommodation-based support across various properties in Brighton & Hove. This includes units with 24-hour support, as well as semi-independent accommodation for those with lower support needs, typically those transitioning from high-support settings.

The projects include Gareth Stacey House (high support), Lansworth House (high and medium support), and Chris Batten House and Blatchington Road (both offering medium to low support).

### *Young Families Support Service*

YMCA DownsLink Group also deliver a core funded supported accommodation for young parents aged 16 to 25 with children up to 5 years old. It adopts a trauma-informed approach and works closely with NHS and social care services.

### *Stopover*

The core funded Stopover project delivered by Impact Initiatives offers tailored support and accommodation for vulnerable young women, including those with complex and high support needs. Stopover's eleven houses and staff team give on-going support throughout the transition from 24-hour support to living independently.

## Accommodation based support services for adults

### Low support accommodation services

Someone with low support needs can recognise their own needs, are fully engaged with the support offered and can seek help when they need it. Many people living in low support housing have stepped down from high or medium supported accommodation, rather than moving directly into a low support service.

Someone living in low support housing will typically have up to 2 hours individual support a week plus access to additional activities within or outside the service. They are not expected to require support from the service outside of normal office hours, being able to access help from universal services if needed.

#### *George Williams Mews*

Brighton YMCA provide 24 units of core funded self-contained accommodation. The support offered is based upon a personalised support plan. People using the service are supported to manage their accommodation in preparation for independent living. This includes claiming housing benefit, paying rent and utilities, and maintaining the condition of the property.

#### *Quays Housing*

Quays Housing provides grant funded, low support accommodation for people aged 18 and over who have been rough sleeping. The service offers 29 beds in self-contained accommodation with low-level on-site support. Residents receive 1 to 2 hours of flexible support a week, with regular contact tailored to their individual needs. They can participate in a variety of activities based on their preferences and aspirations. Support is delivered using a personalised approach within a psychologically informed environment.

#### *St Mungo's*

St Mungo's, in partnership with Clarion Housing Association, deliver a grant funded project for people needing low levels of support. The scheme comprises 23 self-contained flats, including bedsits, one-bedroom flats, and two two-bedroom flats, all let on Assured Shorthold Tenancies. Support from St Mungo's staff is available Monday to Friday from 8am to 6pm, with on-site security outside these hours.

The service takes a psychologically and trauma-informed approach, incorporating strengths-based and recovery-focused practice. Support offered is personalised and client-led, empowering people to work towards long-term independence.

#### *Rapid Rehousing Service*

Southdown deliver the grant funded Rapid Rehousing service provides move-on homes with floating support. Referrals are taken for people with low support needs currently



rough sleeping, those with a history of rough sleeping living in emergency accommodation, or those at risk of rough sleeping. The service comprises 29 private rented sector flats secured under 10-year leases and located across the city. It offers personalised, flexible support, with the goal of enabling tenants to access settled accommodation within two years. The service works closely with the council's temporary accommodation team who allocate the accommodation.

### *Transition and Resettlement Service*

Southdown also deliver a Transition and Resettlement Service, providing floating support to help people move successfully into independent accommodation.

Commissioned with core and grant funding, it provides flexible floating support to people living in independent housing. This service is available to those who have moved directly from rough sleeping, from supported accommodation, including mental health supported accommodation, or from interim accommodation arranged by the council. It also supports people who are having difficulty living independently and sustaining their tenancy. The service works closely with the council's Housing Solutions Team. Eighty percent of referrals come through the rough sleeping and single homeless pathway with the remaining 20 percent via the mental health pathway.

### *Medium support accommodation services*

Someone with medium support needs can engage with services but their level of engagement and motivation to change may be inconsistent and fluctuate. They will generally be able to manage with some support; however, their fluctuating needs could give rise to relapse or disengagement from services. A person with medium support needs may occasionally require access to support from staff overnight or at the weekend.

People with medium support needs will generally receive support from on-site staff or partner agencies for up to 5 hours a week. Support will need to be flexible to respond to an individual's changing support needs and aim to prevent crises or relapse. Additional group work and support to engage with off-site community activities can be part of someone's journey towards independent living.

### *Brighton YMCA*

This core funded service provides 123 units of shared and self-contained medium support accommodation across three sites. Using psychologically informed environment, trauma-informed, and strengths-based approaches, the service tailors support to meet individual needs. It empowers clients to identify their aspirations, overcome barriers to recovery, build resilience, engage with their local community, and maximise their potential for independence. The service also offers peer-led support, in-house counselling, with on-site support for mental health, and substance misuse issues. There are daily activities, support to access work and learning opportunities,

and enhance wellbeing. Personal budgets enable clients to access activities, either on or off site.

### *Seagull Project*

Using a personalised trauma informed model, Safe Haven Sussex deliver the grant funded Seagull Project provides safe and stable supported accommodation for single adults, to enable an ongoing period of stability and step down into lower support whilst long term options are put in place to prevent repeat homelessness. Provision of smaller units of accommodation bridges the gap between current accommodation and independence for individuals requiring medium level of support. The Seagull Project provides 36 units of accommodation in houses across the city.

### *Housing Led Support Service*

This grant funded project accommodates 40 residents with medium-support needs. It is delivered by the same St Mungo's team as the high support Housing First service. Residents are expected to be ready to move to a lower support or independent living setting within a two- to three-year timeframe.

## **High support accommodation services**

Someone is deemed to have high support needs if they have trauma-related support needs such as mental health issues, substance misuse, physical frailty, offending behaviour or combinations of these. Some people using these services may be ambivalent or reluctant to engage with support offered. Residents may require access to support 24 hours a day, have one to one contact time with staff for at least 5 hours a week plus additional group and community activities.

### *Phase One*

Brighton Housing Trust's Phase One is a core funded, 52 bed hostel for single homeless people with complex support needs. The service offers a strength and needs based service, tailored to the individual resident. It offers a psychologically informed and recovery focused approach, and flexibility and personalised support along with a range of life skills, group work, peer support, network building, community involvement and leisure activities all geared to increase engagement, build resilience and support positive change.

### *George Williams Mews*

Brighton YMCA's George William Mews service also provides 25 high support accommodation units across five shared houses, offering support within a psychologically informed environment. Residents receive help to build relationships within the community, engage in health and wellbeing activities, and explore work and learning opportunities. Access to an in-house counselling service is also available.

### *Equinox Care*

Equinox Care's core funded women's high and medium support service offers a specialist women only support and accommodation with a personalised, gender aware and trauma informed model. The service offers 18 (9 high support + 9 medium support) units of accommodation over two sites in Hove.

The high support site has 9 beds with 24/7 staffing. It provides intensive support and accommodation for women with multiple and complex needs and offers a safe environment for stabilisation and assessment. Residents can work to develop a personalised recovery plan and address the issues that led to them becoming homeless.

The medium support site provides step down accommodation for women from the high support service who are ready to live in a lower support environment but still need the help of staff to maintain and continue their recovery. It also offers support and accommodation for women coming into the service with less complex needs.

### *Housing First*

The core and grant funded Housing First service delivered by St Mungo's offers 60 units of high support needs accommodation. People using the service are offered a home in council housing stock with flexible and personalised support provided. The housing offer is unconditional, and support is not dependent on behaviour. Clients are seen at least weekly, often daily, with staff using an assertive support delivery model with creative, tailored approaches. The team has a personalisation fund to enable residents to engage in leisure or learning activities that align with their interests or to help them purchase items for their homes.

### *Off Street Offer*

Off Street Offer is a grant funded accommodation-based rapid assessment and move-on service for men experiencing homelessness, including those with a history of long-term or reoccurring rough sleeping. It is delivered by Brighton & Hove City Council's Homes and Adult Social Care directorate. The service identifies a suitable accommodation option and makes appropriate referrals. It also facilitates reconnection to other local authority areas for those with recourse to public funds but who have no local connection to Brighton & Hove. The male only service has 30 units of accommodation and takes referrals from the Street Outreach Service. The service has no minimum stay but has a target for an average stay of 90 days.

### *Homeless Outreach Assessment Project*

The Homeless Outreach Assessment Project, delivered by Change, Grow Live, is a grant funded 16 bed service. The project takes referrals from the Street Outreach Service. The service has no minimum stay but has a target for an average stay of 90 days. It

prioritises women experiencing rough sleeping and will also work with couples. It also accepts referrals for people with no recourse to public funds.

### *Surge Accommodation*

Change Grow Live also deliver Surge Accommodation, a grant funded 14 bed service that will accept referrals for people with no recourse to public funds. It takes referrals from the Street Outreach Service and has no minimum stay.

### *Severe Weather Emergency Protocol provision*

Change Grow Live deliver severe weather emergency provision in the city. When activated, the Severe Weather Emergency Protocol (SWEP) offers shelter to all rough sleepers in the city. The SWEP is currently activated on the forecast of 'feels like 0 degrees' as predicted on the MET office website, when there is an amber weather warning or at other times when severe weather is predicted. Shelter is provided regardless of an individual's needs or local connection. The council is required to ensure that the shelter venues are in place, are adequately staffed and are managed safely.

## Services provided by the voluntary, community and social enterprise sector

*Working Together*, a 2021 report by Community Works, the Frontline Network, Justlife and YMCA DownsLink Group, mapped services provided by the voluntary, community and social enterprise (VCSE) sector to address homelessness in Brighton & Hove. Based on responses to a survey of 44 VCSE organisations they identified 110 VCSE organisations operating in the city, providing 204 relevant services. These covered accommodation, advice and practical support as well as help to prevent homelessness. The VCSE organisations identified included those specialising in support for people experiencing homelessness and non-homelessness-specific organisations. The information below is derived from the *Working Together* report unless otherwise stated.

The city's VCSE sector offers people experiencing homelessness a wide range of accommodation and other support services, including social connection, food, basic provisions, health and wellbeing support, life skills, training and employment advice.

In 2021, the sector provided 772 units of accommodation, including accommodation commissioned by the council and accommodation funded from other sources, including grants and charitable donations. In the previous year, with the support of VCSE organisations, 426 people achieved a positive move on from their accommodation, with 408 people securing accommodation in the private rental sector.

Of the 44 organisations who responded to the *Working Together* survey, all offered other support apart from accommodation. 41 organisations provided help with basic needs,

with the provision of food as the most common form of support, including foodbanks, food parcels and meals. Other support for basic needs included clothing, bedding, furniture, phones, and hygiene items.

Most of the organisations surveyed for *Working Together* provided help to promote independence, including developing personal resilience, pursuing interests and hobbies, and building critical life skills, such as budgeting, planning and managing conflict.

Twenty-nine organisations provided some form of advice and information, including signposting to other sources of support, 9 gave debt advice and 5 provided legal advice. Other areas of advice and information included welfare benefits and housing advice, including how to access the private rental sector. Several organisations offered advocacy, mediation, casework or key worker support.

Nine organisations offered regular drop-ins, with four providing a day centre service. Street outreach services were delivered by 5 of the organisations surveyed.

Health and wellbeing were identified as significant issues facing people experiencing homelessness. Almost half the organisations surveyed offered services to support health and wellbeing, ranging from mental health support (n=20), substance misuse (n=13), physical health (n=12) and sexual health (n=6). Others provided wellbeing activities, befriending, spiritual support and help with the welfare of people's pets.

Many organisations provided support for specific communities and groups of people including women (n=20), people with long term conditions (n=16), LGBTQI+ people (n=15), current or ex-offenders (n=14), children and young people (n=11), survivors of domestic violence (n=10), refugees (n=9) and others.

The VCSE sector also plays a significant role raising public awareness of the issues surrounding homelessness, fundraising, campaigning for change, and seeking solutions to prevent homelessness. Finally, sector plays a key role in facilitating and contributing to partnership working to address homelessness. This is addressed more fully in the section below on partnerships.

The *Working Together* report estimated that the value of services provided by the VCSE sector in the city was somewhere between £10 million and £20 million. The report points to the ability of the sector to generate additional income to tackle homelessness from grants, charitable donations and other non-statutory sources.

## Homeless healthcare services

People experiencing homelessness use a broad range of healthcare services, including universal services such as primary care, community healthcare and urgent care. Access to healthcare is often disrupted by the experience of homelessness and some

healthcare services are used disproportionately by people experiencing homelessness. These include A&E and some specialist services including mental health and drug and alcohol services.

As well as universal healthcare services, there are specialist services in Brighton & Hove for people experiencing homelessness.

### *Arch Healthcare*

Arch Healthcare offer GP services for people who are rough sleeping, living in temporary accommodation, sofa surfing or who are a traveller. With a list size of around 1,600 patients, the practice offers a full range of general practice healthcare services with GPs, nurses, and paramedics. It includes a hospital in-reach team, an outreach nursing team, and the health engagement team for people living in temporary accommodation based with Justlife. The service is commissioned by NHS Sussex and funded through the Better Care Fund.

### *Sussex Community NHS Foundation Trust – Health Inclusion Team*

The Health Inclusion Team comprises nurses, health care assistants, a nurse prescriber, an occupational therapist, an associate therapist, and a physiotherapist. There is also a dedicated hospital in-reach nurse. With a caseload of around 150 patients, the service focuses on patients with tri-morbidity, meaning those with three or more chronic health conditions. The team works in a trauma-informed way, recognising the impact of past negative experiences on patients' engagement with services. The goal is to help patients manage their health needs and improve their engagement with both primary and secondary healthcare services. The team collaborates with other organizations, including Arch Healthcare, Justlife, and the council's housing and social care services. The service is funded through the block community health contract.

### *Sussex Partnership NHS Foundation Trust – Homeless Support Team*

The Homeless Support team delivers mental healthcare to homeless and insecurely housed people in Brighton & Hove. With a caseload of approximately 125 patients, the service aims to provide high quality, easily accessible and flexible healthcare to people with a mental illness who are rough sleeping, living in temporary accommodation, or sofa surfing. The team does not work with people living in supported accommodation or people at risk of homelessness as these client groups are able to access mainstream or other support services.

## **Services for people with Multiple Compound Needs**

People with Multiple Compound Needs experience 3 or more of the following: homelessness, substance misuse, mental health issues, domestic abuse, contact with the criminal justice system. Brighton & Hove Health and Care Partnership, comprising NHS commissioners and providers, the council, and the voluntary and community

sector, has agreed that Multiple Compound Needs as one of its five population health priorities for the city. The partnership is delivering a Multiple Compound Needs transformation programme to drive greater integration across specialist homeless healthcare, housing and social care services to improve outcomes for people with Multiple Compound Needs.

### *Changing Futures Sussex*

The national Changing Futures programme is a joint initiative by the Ministry of Housing, Communities and Local Government (MHCLG) and The National Lottery Community Fund. The Changing Futures Sussex pilot programme covers East Sussex, West Sussex and Brighton & Hove. Funding was initially allocated until the end of March 2025, but the government has extended Changing Futures funding for a further year.

Changing Futures Sussex operates at individual, service and system levels. Individuals referred into the service receive flexible, trauma informed, person-centred support when they need it, leading to more periods of stability and more opportunities to make positive changes in their lives. The service operates a ‘no wrong door’ approach and coordinates support across services, thereby reducing demand on ‘reactive’ services. At the system level Changing Futures aims to build effective multi-agency partnerships with data sharing agreements and better use of data shaping service commissioning.

Changing Futures Brighton & Hove is a multi-disciplinary team (MDT) based within Brighton & Hove’s City Council’s Homes and Adult Social Care Directorate. The service has 13 full time equivalent staff comprising social workers, housing options staff, peer support workers, domestic violence and drug and alcohol specialists. With a caseload of around 120 service users, it is jointly funded by the Changing Futures Sussex grant, the city council and the NHS Better Care Fund.

The Changing Futures MDT aims to provide a holistic ‘wrap-around’ service for people with Multiple Compound Needs. It also aims to deliver swifter and safer outcomes for women and fewer preventable deaths and Safeguarding Adults Reviews (SARs) relating to women experiencing multiple disadvantage. The pilot service launched in December 2022 and was fully operational by summer 2023.

The Brighton & Hove MDT pilot was recently independently evaluated.<sup>26</sup> Recommendations made by the evaluators are summarised below, with detailed findings in the full report. Some of these relate to the planned creation of a new Multiple

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<sup>26</sup> Imogen Blood Associates, [Independent Evaluation of Changing Futures Multi-Disciplinary Team](#), Brighton & Hove, 2025

Compound Needs Integrated Community Team but others have broader implications for homelessness support and accommodation services.

- Build on the trauma-informed, Team around Me, approach in the planned new Multiple Compound Needs Integrated Community Team.
- The design, delivery and ongoing monitoring and evaluation of the Integrated Community Team should be co-produced with people with lived experience.
- Increase the supply of safe and suitable emergency accommodation for people with Multiple Compound Needs who are particularly vulnerable to abuse and exploitation, including domestic abuse.
- Consider how gender-specific services for women with Multiple Compound Needs in the city might be better integrated and barriers to access reduced.
- Further work is needed to engage criminal justice agencies.
- Need for an integrated response to co-occurring mental health, substance use, and underpinning trauma.
- Build in a flexible personalisation budget for the Integrated Community Team to ensure people's immediate needs are met, for example, for food, drink, bedding, clothing, transport, personal and household items.
- Better join up existing resources, develop clear housing, care and support pathways for people with Multiple Compound Needs and consider how the Housing First offer might be scaled up as part of the next phase of Integrated Community Team development.
- Sustain the wealth of community recovery activities in the city and continue to develop the 'recovery pack' and training offer being developed by the MDT's peer support team.
- Ensure longer-term monitoring of outcomes and patterns of wider service usage across the caseload.



# Resources

## Partnership arrangements

A review of partnership arrangements by the Assistant Director of Housing in early 2024 identified 32 standing partnership groups and forums which were relevant to tackling homelessness and rough sleeping in the city. A mapping exercise by Common Ambition in 2023 (updated February 2024) identified 21 multi-agency meetings, forums and working groups.<sup>27</sup>

Some of these groups relate to a broader geographical area but most are specific to Brighton & Hove. They can be categorised along the following lines:

**Statutory and non-statutory groups, where homelessness is a consideration but not the sole focus of the group.** Examples include the Safeguarding Children Board, Safeguarding Adults Board, Health and Wellbeing Board, Community Safety Partnership, Violence Against Women and Girls Oversight Board, Mental Health Accommodation Group, Sussex Trauma Informed Community of Practice and others.

**Networking and strategic groups where homelessness is the primary focus of the group.** These include the following standing groups:

The Homelessness and Rough Sleeping Network, facilitated by Justlife, comprises leaders from the voluntary, community and social enterprise sector working towards ending and preventing homelessness through collaboration within the sector and with statutory partners and wider stakeholders. The network has around 25 member organisations and meets quarterly, with a chief executive officer and strategic leads group meeting monthly. There are also sub-groups focused on workforce development, and psychological safety.

The Homelessness Operational Forum is a monthly forum for homelessness services across the city to share updates on services, best practice, updates on commissioning. Initially set up by homelessness commissioners at Brighton & Hove City Council, it is currently facilitated and chaired by Justlife.

Brighton & Hove Frontline Network provides a space for Brighton's frontline homelessness workers to connect. The network has a monthly e-newsletter and hosts in-person events where workers can learn, share ideas and discuss relevant topics and issues. Facilitated by Justlife, it is part of a national network organised by St Martin in the Fields.

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<sup>27</sup> Common Ambition, 2024, Multi-Agency Working Update <https://www.bhcommonambition.org/wp-content/uploads/2023/03/Multi-Agency-Working-Update-March23-v1.pdf>

The Brighton & Hove Homelessness Research Forum brings together academic, third sector and community researchers (including peer researchers) from across the city to exchange ideas, develop joint projects and bring about research-led change, improving the lives of people experiencing homelessness.

The Young Homeless Working Group is co-chaired by YMCA Downlink and Brighton & Hove City Council. The group's purpose is to ensure a strategic partnership approach in the planning and delivery of services to young homeless people (including young families), with the aim of preventing and reducing youth homelessness and ensuring that vulnerable groups, including care leavers, and people with protected characteristics under the Equality Act receive services that are sensitive to their needs.

Healthcare providers meet regularly through the Multi-Agency Homeless Health Meeting.

**Multi-agency standing groups performing a specific role or function**, for example, in project or programme governance or in managing resources or decision making. Homelessness may be a consideration or the primary focus of the group. Examples include the Changing Futures Strategic Sponsors Group, the Multiple Compound Needs Transformation Programme Board, the Multi-Agency Homeless Health Meeting, Common Ambition Steering Group, and the Supported Accommodation Panel.

The 2024 partnership group review by the Assistant Director of Housing pointed to a lack of appropriate governance arrangements to coordinate delivery of the 2020 to 2025 homelessness and rough sleeping strategy. It proposed a new structure to deliver the 2025 to 2030 strategy, comprising a Homelessness and Rough Sleeping Strategy Steering Group with 3 to 4 thematic delivery groups focused on homelessness prevention, securing accommodation, rough sleeping, and potentially youth homelessness.

## Involvement and co-production

Brighton & Hove Common Ambition brings together people with lived experience of homelessness, frontline providers and commissioners through co-production within homeless health services. It is a partnership project hosted by Arch and Justlife. Common Ambition groups have co-created system and pathway maps, co-production toolboxes, tangible service improvements and systems change prototypes and a range of other resources to support co-production.

Justlife Peer Researchers is a project funded by The Young Foundation to test the feasibility of peer research in the housing sector. Two peer research groups have focused on two specific questions related to temporary accommodation in Brighton.

Youth Voices feed into the development of The Clock Tower Sanctuary's services as well as considering broader youth homelessness issues. The group bring a range of

personal experiences of intersectionality that impact their experience of homelessness. Youth Voices have contributed to developing thinking on a homeless hub, with a focus on young people.

## Funding

The funding available for expenditure on council funded homelessness services is drawn from a combination of the council's own resources and income from rents, fees and charges and grant funding from central government.

The 2025/2026 budget for Housing People Services (comprising Housing Options & Homelessness, Temporary Accommodation and Travellers Services) was £31.447 million. This includes the £28.026 million cost of providing temporary accommodation.

The total budgeted income for Housing People Services for 2025/26 is £22.627 million, of which income for temporary accommodation is £20.146 million.

Council 2025/26 Revenue Budget										
Service Description	Employee Expenditure £m	Other Expenditure £m	Total Expenditure £m	Income From Fees, Charges & Rents £m	Other Income £m	Government Grants £m	Total Income £m	Total Budget Allocation £m	Capital Charges & Recharges £m	Net Expenditure / (Income) £m
Housing Options & Homelessness	2.812	0.098	2.91	-	-0.001	-2.371	-2.372	0.538	0.327	0.865
Temporary Accommodation	3.064	24.963	28.026	-11.50	-0.102	-8.536	-20.146	7.88	0.865	8.745
Travellers Services	0.198	0.313	0.511	-0.109	-	-	-0.109	0.403	0.153	0.555
<b>Housing People Services Total</b>	<b>6.074</b>	<b>25.374</b>	<b>31.447</b>	<b>-11.617</b>	<b>-0.103</b>	<b>-10.907</b>	<b>-22.627</b>	<b>8.82</b>	<b>1.345</b>	<b>10.165</b>

Source: [Brighton & Hove City Council Budget Book 2025/26 & Medium Term Financial Strategy 2025/26 to 2028/29](#)

Housing People Services have a 2025/26 savings target of £2.5 million.

The council also funds housing support for vulnerable individuals to help them live independently. The allocated Supporting People budget for 2025/26 is £1.012 million. A further £2.255 million is allocated to fund Supported Accommodation.

Other 2025/26 council funding allocated but not included in the figures above includes the provision of accommodation by Asphaleia for Unaccompanied Asylum Seeking Children (Asphaleia), the drug and alcohol recovery service (Change Grow Live) and grant funding for YMCA Downslink Group - Youth Advice Centre, Justlife and Sussex Homeless Support through the Household Support Fund.

## Grant funding

As well as income from rents, fees and charges the council receives grant funding from central government.

The Homelessness Prevention Grant (HPG) is intended to prevent homelessness and households entering temporary accommodation. Brighton & Hove's HPG allocation for 2025/26 was £10,907,372.

The Rough Sleeping Prevention and Recovery Grant (RSPARG) consolidate the main rough sleeping and single homelessness focused grants into a single pot. RSPARG funding was first allocated to local authorities for 2025/26, with Brighton & Hove receiving £2,364,470 to help support people experiencing rough sleeping in the city.

Services provided through RSPARG include off street offer accommodation, reconnections services for those experiencing rough sleeping, long term supported accommodation, support for access to the private rented sector including specialist role working with those leaving prison.

The Rough Sleeping Accommodation Programme is intended to provide ongoing support costs to help rough sleepers into longer-term accommodation alongside specialist staff supporting their mental health and substance abuse problems to pave the way for job opportunities. Brighton & Hove's allocation for 2025/26 was £856,041.

Brighton & Hove is one of 83 areas receiving Rough Sleeping Drug and Alcohol Treatment Grant. This is intended to fund evidence-based drug and alcohol treatment and wrap around support for people sleeping rough or at risk of sleeping rough, including those with co-occurring mental health needs. The allocation for 2025/26 was £741,281. It funds 3 accommodation based supported housing projects including housing led support for people with council tenancies.

In 2024/25 the council also received an additional central government grant of £595,016 to address additional homelessness and rough sleeping pressures during winter 2024/25. This was announced as one off funding and there is no guarantee that a similar amount will be received in 2025/26.

Funding for specialist homeless healthcare services is approximately £3.34 million, with funding from NHS Sussex, the Better Care Fund, the national Changing Futures programme and the Public Health Grant.

## Future cost pressures

### *The rising cost of temporary accommodation*

The use of temporary accommodation brings major financial risks for the council as costs reflect levels of demand, price inflation and supply shortages. All these factors

drive the use of more expensive forms of accommodation to meet the council's legal duties. Over the last 2 years, the rising cost of temporary accommodation has placed significant pressure on the council's overall financial position. The council budgeted for costs of £28 million on temporary accommodation in 2025/26. It is projected that there will be an overspend on this allocation by the end of the financial year.

The scale of the private rented sector market in the city and the council's use of the sector to provide almost 30% of its temporary accommodation mean that the council is particularly exposed to inflationary pressures in the market. The net cost of temporary accommodation to the council is projected to rise by about 40% over the two years 2024/25 and 2025/26.<sup>28</sup>

The rent subsidy for temporary accommodation determines what local authorities are allowed to recover for temporary accommodation for homeless households. This is limited to 90% of 2011 Local Housing Allowance rates. This rent subsidy level is much lower than current market rents and means that the council must subsidise the cost of temporary accommodation with an increasing net cost to the council over time.

Broadly speaking, temporary accommodation falls into two categories: firstly, there is more settled temporary accommodation where people assessed to be owed a housing duty are placed until they secure permanent rehousing. This form of accommodation usually involves placement in council owned accommodation or accommodation supplied through longer term deals with private landlords. The second category (historically termed emergency accommodation) involves interim placements to relieve homelessness while homelessness applications are assessed. In the main, these interim placements are generally made using two forms of accommodation; block-booked, where units are secured for a fixed period, and spot-purchased, where units are procured in real time on a nightly basis. Spot purchased accommodation is generally the most expensive form of temporary accommodation and often involves placement in hotels and B&B.

The private rented sector in the city used to be a source of lower cost block booked accommodation in the past. However, fewer units are now available through the sector, with landlords leaving the market as leases come to an end. Consequently, this form of accommodation has had to be replaced by spot purchasing as the most readily available form of supply to meet immediate needs. Between the end of 2022 and the end of 2024, the number of spot purchased accommodation units increased from 114 to 379. Inflation within the private rented sector overall has meant cost increases for both block-booked and spot-purchased units.

An internal review of temporary accommodation cost pressures in early 2025 concluded that the issue presented a significant corporate risk to the council.

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<sup>28</sup> 2025/26 figure based on projected year end position.

Recommendations for immediate action included better use of financial and activity data to improve both monitoring and forecasting; improved forecasting of supply needs over the next 3 years; better understanding of triggers of homelessness to move prevention activity ‘upstream’; improved move on from higher cost accommodation; various measures to increase supply including better use of council stock, and working with the private and social rental sector to deliver additional units.

### *Anticipated loss of grant funding*

In 2024, the Ministry of Housing, Communities & Local Government (MHCLG) conducted a review of the Homelessness Prevention Grant (HPG) formula to look at different ways to capture and represent homelessness pressures to fairly reflect need in the distribution of funding. MHCLG consulted on proposed changes in early 2025.<sup>29</sup> Proposals included a change to the funding formula, separating the funding into two distinct elements to cover temporary accommodation pressures and prevention and relief pressures, and transitional arrangements to allow local authorities to mitigate the impact of changes in allocations.

The modelled impact of the proposed changes to the formula from 2026-27 onwards, using MHCLG illustrative figures, indicates that Brighton & Hove could see a loss of around 45% of its HPG funding. The grant allocation in 2025-26 under the current formula is just over £10.9 million. This would be reduced to about £6 million using the new formula. The consultation contained proposals for a taper in funding reduction over several years.

MHCLG published the outcome of the consultation and set out next steps on 20 June 2025. As a result of feedback, there has been a further change to the funding formula and an agreement to implement transitional arrangements. A final decision has not been taken on a maximum 45% of grant funding to be used for temporary accommodation and 55% on prevention and relief. MHCLG have indicated that the new allocations, transitional arrangements and funding split will be finalised later in the year.

Under current legislation, local authorities are permitted to spend the Homelessness Prevention Grant to discharge any of their duties under homelessness legislation. At present 78% of the grant is spent on the cost of providing temporary accommodation. In its consultation on changes to the funding formula the government indicated a future expectation that a maximum of 45% of the grant can be spent on temporary accommodation. The expected changes present two challenges for the council. Firstly, the overall reduction of grant funding available, and secondly, how to shift grant funding

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<sup>29</sup> The original consultation documents and the government’s response can be found at <https://www.gov.uk/government/consultations/funding-arrangements-for-the-homelessness-prevention-grant-from-202627-onwards>

away from temporary accommodation towards prevention at a time when temporary accommodation costs are rising rapidly.

## Evidence submitted for the review

### What people with lived experience of homelessness told us

Brighton & Hove Common Ambition aim to improve support systems in Brighton & Hove through co-production and advocating for lived experience voice to be central to service and system change. Evidence from Common Ambition included feedback on the homeless pathway and homelessness services in the city from people with lived experience of homelessness.<sup>30</sup> Challenges identified included:

- Feeling isolated, unsupported, unsure of where to go and your rights  
‘All of your time and energy is put into finding somewhere safe to live, you are jumping from one option to the next. It can be very isolating.’ ‘It can be really hard to know where to turn to for support, it’s hard to know what services exist and which ones will help in which situation.’ - ‘It can be really difficult to know what your rights are and where to go if they aren’t being met.’
- Fear, mistrust, stigma and judgement  
‘The process is all based on doubt not trust. Council staff don’t take what you say at face value, you have to evidence all of your needs and it can be very difficult to do that. It feels like no one believes you or is even listening to you.’  
‘You are often asked to explain your story and situation over and over to different services which can be really hard to keep doing.’
- Lack of communication and consistency  
‘It’s really hard to get in contact with anyone for support, people don’t call you back from the council.’ ‘Often services like the council require you to make phone calls which can be difficult if you don’t have access to a phone, don’t feel comfortable talking on the phone or aren’t in a situation where you can make phone calls.’ ‘There is a lack of communication about what the process is or what the next steps look like.’ ‘It’s hard to know where you are in the process or what the whole process looks like. The whole housing pathway is unclear so it’s hard to know what the next steps are.’ ‘It’s not always clear who your housing officer is or how to contact them.’ ‘No one talks to each other across services so you can be told different things.’
- Inadequate housing options  
‘You can’t really say no even if the housing you are given is out of area or inaccessible due to health care needs. The council might conclude you are intentionally homeless and won’t give you any other accommodation.’ ‘You can be evicted from emergency accommodation very easily. For having pets, for drug use, antisocial behaviour.’ ‘You don’t know how long you might be there. It can

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<sup>30</sup> Common Ambition, 2022, *Brighton & Hove Housing Pathway Map*  
<https://www.bhcommonambition.org/resources/#housing-pathway-map>



be really hard to settle into somewhere as you don't know when you are going to be asked to leave.' 'Sometimes you aren't put in a place that supports your recovery. Sometimes people are placed in wet or dry houses but sometimes this isn't possible and can be very difficult for someone's recovery.' 'Emergency accommodation might not be accessible. Sometimes you might not have been able to prove your accessibility needs yet so the council put you somewhere that isn't accessible to you.' 'Emergency accommodation doesn't always have access to kitchens If you have dietary requirements and don't have access to a kitchen this can be really challenging.' 'Some people don't feel safe in emergency accommodation due to neighbours, location and relationships. Sometimes people leave and then it goes against their record that they have left housing and are therefore intentionally homeless, but they have left as it was negatively impacting their mental health too much to stay.' 'It's not always possible to find accessible council homes as there aren't many of them.'

- Struggle to gather the correct documentation and evidence  
 'Often services like the council require identification documents. Getting ID can be a costly process. Some services also require a fixed address and proof of this. 'The council require evidence of health care needs which can be really hard to get if you don't have a GP (as many GPs won't take on a patient without a fixed address). Also getting a referral and diagnosis to prove your health care needs can take months.' 'It can be difficult to prove a local connection.' 'You have to prove lack of funds to be able to sort out your own accommodation. The council ask you to show your bank statement.'
- Not enough support  
 'Staff don't always have much training or much empathy - there is a lack of support in emergency accommodation.' 'There's a lack of continuity of care and support whilst settling into a home.' 'It's hard to get appointments at GP surgeries and if you don't have a fixed address, they often won't take you on as a patient.' 'It's hard to know what other support you might be able to access. Hard to find out the support available and what criteria you have to meet to get that support.' 'Welfare checks once a month feel more like they are checking you aren't doing anything wrong.' 'Support in temporary accommodation is inadequate. Lack of mental health support in temporary accommodation.' 'Sometimes you are just given the basics - bed, fridge and microwave in temporary accommodation and you don't have money to go and buy a kettle and all the other things you need.' 'It's confusing and unclear who receives the money and when and then how the rent is paid.'
- Other issues identified included the poor condition of some temporary accommodation, digital exclusion and financial difficulties that are compounded by homelessness.

- Getting stuck for long periods of time at points in the pathway  
'There's limited information on council properties. People can't look at the property before they say yes, there is only a small photo on the site, and they can't refuse it unless there are core issues like accessibility.'
- Difficulty moving from place to place  
'If you have stuff to move, it can be hard; taxis don't often want to take you, and they are expensive.' 'You don't get given much notice to move - it's often the same day This makes it really hard to plan for and can be very costly. Often taxi drivers don't want to take you but you have no other options. Sometimes you won't have enough money to move but you have to as otherwise the council will say you have made yourself intentionally homeless as you have not taken their accommodation.' 'There are service charges that Universal Credit doesn't cover.' 'Needing guarantors for private rental.' 'Discrimination against people who are unemployed or who have been unemployed.' 'The quality of housing and maintenance is very low - often places are damp and in need of repairs. Getting things fixed can be really hard and takes ages.' 'Affordability of council home, bills and everything else you need.' 'Lack of community, isolation.'
- Waiting for decisions - 'It can be hard to fill your time with positive things Finding positive ways to fill your days and build positive relationships can be really hard.' 'You can be in emergency accommodation a very long time. 56 days is very rare - to be there just for that period of time.'

#### Suggestions for improvements included

- Awareness raising - 'There needs to be more education around being homeless, often people think it's just rough sleeping when actually it's much wider than that.' 'Explore ways the general public can help more.'
- Prevention - 'More help for people who know they are about to become homeless. It's hard to access support until you are actively in a homeless situation and are a priority need.' 'A&E staff could ask everyone if they have somewhere to go and if they need any housing support This would help to make sure more people could access support.'
- Accessing support - 'Reduce the level of identification needed or enable people to provide one bit of identification and the rest can follow so it's not a barrier to receiving support.' 'Having one place for people to go to access support and find out information.' 'Emergency numbers for the council seem to be deliberately hidden. They need to be easy to find.' 'Council helpline to be more easily accessible and publicised.' 'Have a passport type system where all of your information can be kept in one place that you can share with services when you want or need to so you don't have to keep telling each service provider your story.' Better information and signposting in accommodations to ensure you

know about all of the support services available.’ ‘Recruit and train more staff.’ ‘Financial and physical support to move home.’ ‘Better training for staff to dispel preconceptions and stereotypes.’

- Housing quality and meeting people’s needs  
‘In some areas they have a safe surrender initiative where someone can give up their housing if they feel like they need alternative housing support and it doesn't go against their file as intentionally homeless. Currently what happens in Brighton & Hove is if you leave accommodation they will say you have made yourself intentionally homeless and it will be on your record forever.’ ‘Higher quality temporary accommodation. Often things are in need of repair.’ ‘Minimum quality housing charter.’ ‘Better ways of being able to raise repair issues.’
- Information - ‘Clear information about what the housing pathway looks like, how long it might take and what is involved so people know what the next steps are.’ ‘Translation of key documents and service information into foreign languages.’ ‘Clear explanation of the rules is needed - there are many reasons why you could be evicted from temporary housing.’ ‘Easier access to the housing plan that has been created by the council.’ ‘Standard letter template that tells someone who their main point of contact is and who their housing officer is.’ ‘More information about what addresses you can use if you don’t have a fixed address and need to receive documents like benefit forms.’
- Evidencing need - ‘Template referrals form that GPs have that they can quickly create a referral and pass onto the council so that people’s healthcare needs are evidenced.’
- Move on – ‘Minimum two days notice when asked to move home.’ ‘More help to settle into permanent accommodation. Mental health needs are often still there.’ ‘Clear support and pathway if the housing is not suitable or your needs change.’
- Peer advocacy - ‘Peer advocacy - having someone there to help support you through the process would be really helpful.’
- Feedback and accountability - ‘More transparency from the council about what is happening, gathering more feedback from people and letting them know what improvements they are making.’ ‘Feedback forms for people who have been through the housing pathway.’

Building on their work to map the housing pathway, Common Ambition have identified 6 change spaces where they recommend improvements in the pathway should be focused.<sup>31</sup> These are

- Homelessness prevention

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<sup>31</sup> Common Ambition, 2022, *Housing Pathway Change Spaces* <https://www.bhcommonambition.org/wp-content/uploads/2023/02/Maps-Housing-Pathway-Change-Spaces.pdf>

- Finding support and preventing delays
- Housing needs service experience and improvement
- Living in supported or temporary accommodation
- Moving into and living in a permanent home
- Supporting recovery from the experience of homelessness

In 2023, Justlife secured funding from the Young Foundation for a peer research project. People with lived experience of homelessness identified two issues they wanted to explore. They submitted their findings to inform the review. The research questions were:

- How do we prevent people of different intersectionalities from ending up in temporary accommodation.
- How do conditions in temporary accommodation impact people's mental and physical health?

Several themes were identified by the project:

- Quality, safety and suitability of accommodation – 'Suitability in terms of identity and neurodiversity.' 'Is it suitable anyway, but people who find themselves in this situation. It gives it another level.' Places in dark basement flat. No sound insulation. Wake me up every single morning...Because the autism. They've now brought a drum kit.' 'The place they've put me in isn't suitable. I don't have a safe bedroom. Don't have a bedroom in my life where I can just sleep.'
- Accessibility of council services – 'It was impossible getting through to the council if it was not a local charity that put me in touch with a caseworker, but even then, anything that is not straightforward gets blocked like my application and it ends in dead end.' 'If you have a specific place where you could go and register as homeless, if the organisation is in one place. 1 stop shop. See people I need to see...I'd like that so much better. They'd talk to each other. I'll go talk to them.' 'Here is the phone number, and the phone number isn't manned anywhere.' 'I didn't have a housing officer. Mine was off sick.'
- Having to repeat stories – 'When I have given the info they need, they still don't understand.' 'Always got to talk about the same stuff, it brings you down.'
- Lack of understanding and empathy – 'Why is this on me, A professional is there to help. Why is it on me to beg? All this effort, you're still not listening to me. Training with neurodiversity and trauma. Complete lack of understanding.' 'There is a time when the council expect you to prove things. A friend asked to prove Domestic Abuse. It makes me so mad. What rights do you have to ask to prove abuse?'
- Poor quality temporary accommodation – 'Place where to get washed. You can't.' Safety. Police knocking all times of the night. Difficult for people to go to

work when your are in TA.’ ‘No locks on door.’ ‘People shouldn’t be housed together in poor conditions.’ ‘Sometimes I find it difficult to be with so many different people with different needs and it can be triggering’ ‘Rooms aren’t soundproof.’

- Impact of system – ‘System is traumatic. Navigating system is traumatic. That includes living in TA.’ ‘System is robbing people of meaningful future. If you’ve been homeless for long periods of time. Hard to apply for jobs.’ ‘Trauma, trust issues, identity issues, building healthy relationships, increased isolation, Unemployment, Stress-related health issues, Substance issues.’ ‘Revolving door clients - could go on for 10 to 20 years for some people. Revolving door clients are ruined mentally and physically from going through the system constantly for years.’
- Move on ‘If there was more support when people come out of accommodation, might be able to prevent them re-entering that situation. People are often in and onto. More support at that point, might increase prevention. Can prevent homeless. That model works with health, limit readmissions.’ ‘Could take years to recover from homelessness, it’s a long process and takes years.’

## What those working in the sector told us

### Issues identified in written submissions

As well as evidence submitted by people with lived experience of homelessness, following our initial call for evidence in December 2024, reports and other written evidence were submitted by the following organisations:

- Brighton & Hove City Council Encampments Team
- Changing Futures Sussex
- Clock Tower Sanctuary
- Justlife
- LGBTQ Switchboard
- Oasis Project
- Rise
- Safe Haven Sussex
- Sisters Salon
- Sussex Interpreting Service
- Sussex Nightstop
- University of Sussex Students’ Union
- Voices in Exile
- YMCA Downlink Group

Where this evidence is in the public domain references are provided in Appendix 1.

## Young people

The Clock Tower Sanctuary, Sussex Nightstop and YMCA Downslink Group submitted a recent insight report conducted to better understand how young people seek out information and support, to understand how to improve service provision.<sup>32</sup> They made the following recommendations:

- Recognise young people as a cohort with specific needs within the emerging Brighton & Hove Homelessness and Rough-Sleeping Strategy through a youth-specific homelessness chapter. This could include a cross-themed commissioning group that recognises the economic and social value outcomes of prevention and early intervention within youth homelessness work.
- Design and capacity-build the frontline response to youth homelessness and develop the case for resourcing a coherent and consistent 'front door' support offer with kindness, advocacy and navigation at its heart.
- Design, deliver and consistently invest in a city-wide, young-people-facing communications initiative that puts inclusivity, clarity of service offer and an encouraging and supportive approach at the fore.
- Meet young people where they are through a city-wide educational and learning piece that raises understanding of the issues of youth homelessness across workers and individuals on the frontline and that builds a high-quality, collaborative and trauma-informed youth homelessness practice approach.
- Maximise the engagement of young people in the ongoing co-production of services through joined up and representative youth voice initiatives.
- Work with academics to produce and implement a data strategy for the consistent measuring and therefore improved understanding of youth homelessness.

The Clock Tower Sanctuary submitted a report summarising the impact of their service provision for young people experiencing homelessness in Brighton & Hove. They draw attention to increases in young people experiencing homelessness both nationally and locally. For their service users the cost-of-living crisis is the primary driver of their homelessness, with 65% of clients in unsuitable housing (emergency accommodation, rough sleeping, sofa surfing, etc.) 15% were rough sleeping at end of 2023, with numbers continuing to rise into 2024. Young people using their service had limited access to suitable accommodation despite housing advocacy efforts.

Those using the Clock Tower Sanctuary's services often have high level and complex needs:

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<sup>32</sup> Clock Tower Sanctuary, Sussex Nightstop, YMCA Downslink Group, 2025, *Here For You: Insight Report. How do we ensure that young people experiencing homelessness in our city don't fall through the gaps?* <https://www.thects.org.uk/wp-content/uploads/2024/11/Impact-Report-2024.pdf>

- 80% have mental health conditions
- 30% are neurodivergent
- 20% are refugees/asylum seekers
- High levels of trauma and social isolation

The report highlights the importance of meeting basic needs first - providing showers, food, clean clothes, phones, and transport passes. This foundation enables young people to move beyond "survival mode" and engage with longer-term support.

The keyworker model shows strong outcomes, with 534 conversations supporting 95 young people in 2024. 57% of clients felt more confident managing relationships and housing aspirations. Work with 14 local housing organizations and various health and social care providers demonstrates the need for coordinated wraparound support rather than siloed interventions.

The Tenancy Independent Living Skills (TILS) program addresses a critical gap - practical life skills not taught in schools. Only 7% of their clients accessed this, suggesting potential for expansion. The establishment of a Youth Voice Group represents best practice in co-production, ensuring services are shaped by lived experience.

The University of Sussex Students' Union identified the following issues from their casework.

- International students are disproportionately affected due to guarantor requirements and inadequate pre-arrival information
- International students sometimes struggle to provide 6+ months rent in advance if they lack UK guarantors
- Rent arrears puts students at risk of eviction with no financial means to secure alternative accommodation
- Unexpected campus accommodation costs that students cannot afford
- Severe overcrowding with 3-4 international students sharing single-person Airbnb accommodation
- Students sofa surfing and staying with friends
- There are examples of students fleeing domestic violence situations
- Vulnerable students estranged from family with no support network
- Problems peak at the start of academic year when housing demand is highest
- International recruitment agencies failing to adequately inform students about housing realities in the UK and Brighton & Hove specifically
- Students arriving without secured accommodation arrangements and unprepared for the local housing market requirements
- Students initially approach the University but often don't receive adequate help

- Need for independent Students' Union intervention to advocate with the University
- Inconsistent University response (emergency accommodation provided in some domestic violence cases but not systematically)
- Poor communication from letting agencies about actual housing costs and availability

### *LGBTQ+ people*

Switchboard submitted a report summarising service data relating to 2024. During the year they supported 104 people with concerns relating to homelessness and rough sleeping. Of these, 66 had additional support needs, 18 were trans, non-binary and intersex, 12 were migrants, refugees or asylum seekers. 45% were at risk of rough sleeping and a majority required support relating to suicide prevention. Their recommendations reinforce those in their 2023 LGBTQ+ Housing Manifesto.<sup>33</sup> These are:

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

Switchboard also conducted an audit of the rough sleeping and single homelessness pathway. They made the following recommendations:

- LGBTQ+ inclusion training to be commissioned and provided across the pathways, to service managers. Training was provided at service manager level, intended to be disseminated to respective organisations internally. This took place in early 2024. It is recommended that providers seek training from organisations run by/for LGBTQ+ communities and monitor the effectiveness of the training in improving services accordingly.
- BHCC will aim to build in LGBTQ+ lived experience into future commissioning, considering LGBTQ+ specific services but ensure all services are inclusive.
- BHCC will include the information from the audit to help shape and support the Homeless and Rough Sleeping Strategy.
- BHCC will seek evidence of LGBTQ+-affirmative practices, policies and training in future contract reviews, including feedback from service users where possible

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<sup>33</sup> Switchboard, 2023, *LGBTQ+ Housing Manifesto 2023* <https://www.switchboard.org.uk/wp-content/uploads/2024/05/Housing-Manifesto-for-web.pdf>



- BHCC will maximise any future funding opportunities that may be available to support LGBTQ+ residents, working in partnership wherever possible with LGBTQ+ services
- All services across the pathway are recommended to have a LGBTQ+ champion, and to ensure that bullying, harassment and discrimination procedures include specific reference to LGBTQ+ communities, and take into account intersectionality (ie, people who have more than one protected characteristic).

### *People living in temporary accommodation*

Justlife submitted an evaluation of a health engagement worker for people placed in temporary accommodation outside the city.<sup>34</sup> The evaluation was based on interviews with 8 clients of the service. Key findings were:

- Most clients of the service had significant support needs including managing finances and admin, attending health appointments, accessing necessities like bedding and laundry, mental health support, and social contact.
- Being placed away from home areas created extra support needs and increased the risk of people disengaging from essential services.
- While some benefited from being closer to family or escaping disruptive environments in Brighton, the majority struggled daily with unfamiliar surroundings and lack of established support networks.
- Many clients suffered from PTSD, with some developing serious issues including addiction to crack cocaine as a coping mechanism and suicidal thoughts.
- Distance created barriers to attending health appointments, leading to missed appointments and unmet health needs with potential long-term consequences.
- The distance put additional pressure on personal relationships, with one individual giving up custody of his child due to the physical and financial burden of daily school transport.
- Being separated from friends, family, and familiar communities significantly worsened mental health challenges for most interviewees.
- The support offered by the service provided hope and prevented clients from disengaging with services.

Justlife also submitted evidence from a review of the needs of disabled people living in temporary accommodation.<sup>35</sup> Key findings were:

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<sup>34</sup> Justlife, 2022, *Out of Area Health Engagement Worker Evaluation* <https://www.justlife.org.uk/our-work/research-and-policy/out-of-area-health-engagement-worker-evaluation>

<sup>35</sup> Justlife, 2022, *'I kept falling down the stairs': Disability recommendations for the homelessness sector* <https://www.justlife.org.uk/news/2022/i-kept-falling-down-the-stairs-disability-recommendations-for-the-homelessness-sector>

- Higher prevalence of disability - over 35% of those interviewed had disabilities with much higher autism prevalence.
- Unsuitable accommodation creates additional barriers. Examples included placement on upper floors without lifts, heavy fire doors, inaccessible bathrooms and unopenable windows.
- Environmental stressors in temporary accommodation can worsen existing conditions and trigger relapses
- Physical barriers lead to accidents, falls, and further health deterioration
- Isolation increases when people cannot safely leave their rooms or buildings
- The inability to perform basic daily tasks affects mental health and independence

Recommendations were to:

- Provide disability training for housing officers, support staff, and temporary accommodation providers
- Implement tools like the autism toolkit for homelessness services
- Train staff to identify disabilities and assess individual needs
- Establish basic rights standards ensuring residents can independently enter/exit rooms, bathrooms, and buildings
- Proactively install assistive technology (handrails, door openers) without waiting for requests
- Prioritise essential maintenance, especially lift repairs in multi-story buildings
- Retrofit existing properties with accessibility features
- Increase collaboration between disability support services and housing and homelessness organisations
- Use Temporary Accommodation Advisory Groups (TAAGs) to bridge sector gaps
- Include residents with disabilities in service design and decision-making
- Develop clear communication tools available in multiple formats
- Create culture of open dialogue about accommodation needs
- Ensure people understand their rights and how to exercise them
- Conduct more research on the intersection of disability and homelessness
- Make research findings accessible to frontline services and housing teams
- Integrate disability considerations into housing policies, strategies, and budgets

### *Women experiencing homelessness*

Justlife also submitted an unpublished report from the Women's Emergency Accommodation Action Group, comprising members from Justlife, Rise, Change Grow Live, Brighton Women's Centre, Sussex Pathways, Arch Healthcare CIC and Lawstop. The report makes the case for dedicated women's emergency accommodation provision. Key issues identified include:

- Significant safety and security concerns including harassment, rape, sexual abuse and cuckooing in mixed accommodation.
- Trauma and mental health impacts, especially on women who have experienced domestic abuse
- Systemic failure including lack of staff awareness of trauma informed practice and domestic abuse awareness and insufficient specialist support
- The report includes data on higher levels of physical and sexual violence impacting single homeless women and high levels of support for women only emergency accommodation amongst professionals.

The Oasis Project submitted summary service user information from the sex workers' outreach project. Key findings were that:

- Nearly half of women in contact with the service had engaged in a 'sex for rent' arrangement
- This ranged from live in work in a parlour, use of hotel or AirB&B for sex work and accommodation due to lack of deposit for housing.
- Some women had relied on a "Sugar Daddy" to pay for rent, or to provide a deposit.
- Some women reported remaining in sex work long term in order to pay rent and to prevent homelessness.
- Others reported providing unofficial live in care with elderly or disabled individuals in order to avoid homelessness.

#### *Survivors of domestic abuse*

Rise is an independent charity that helps people affected by domestic abuse, offering practical help ranging from direct advice to refuge accommodation for those whose lives are at risk. In their submission for the review, Rise highlighted the following points:

- Domestic and sexual abuse in family and intimate partner relations are a known to correlate with homelessness
- Woman and children are more likely to become homeless or to be more vulnerable when they are homeless
- Poor management of family and civil courts processes and the need to flee from abuse
- Sex as a protected characteristic intersecting with homelessness is widely ignored.

#### *Single adults*

Safe Haven Sussex submitted summary service user data from 2023 and 2024 with a number of points made.

- In both 2023 and 2024 Brighton & Hove City Council made roughly 30% of all our referrals. The next highest referrer in 2023 was YMCA DLG (Youth Advice Centre). In 2024 the second highest referrer was Change Grow Live Street Outreach Service. The number of organisations referring to our service highlights the importance and the need for the VCSE organisations. It also may indicate that not everyone who is homeless is accessing or receiving help through the local authority.
- In both 2023 and 2024 the largest age group of people referred to our service were under 35s. In 2023, 35% were under 25, 23% between 26 and 35, 58% under 35 in total. In 2024, 29% under 25, 37% were between 26 and 35, so a total of 66% of people referred to our service are under 35, showing this is increasing.
- The majority of all our referrals are male. This is consistent with previous years.
- We have found that year on year the number of referrals of people from other nations has increased. In 2024 only 51% of people referred to our service were British. This trend has meant that our service has had to adapt and make changes to the support we are providing. Such as making visual posters on our noticeboards, getting documents translated, and providing interpreters. Also providing training to staff regarding Immigration, and eVisas. All of which come at a cost.
- Only 54% of people referred to our service in 2024 had English as their first language. Meaning our interpreting and translation costs are increasing significantly.

### *People experiencing rough sleeping*

During the review our attention was drawn to the findings of Galvanise 2019, a report on street homelessness in the city.<sup>36</sup> The report found that:

- Brighton & Hove's rough sleepers are predominantly males from the UK in their late 30s to mid 50s. They most often answered that they are sleeping rough in Brighton & Hove because they were living here when they became homeless, or because they have family or friends here.
- One fifth of the people sleeping rough spoken to during Galvanise had been in local authority care as a child.
- 18% of people cited a relationship breakdown as the reason for becoming homeless the first time. Other common reasons for becoming homeless were traumatic events such as abuse, coming out of prison with nowhere to go, and job loss.
- People want jobs but last time and this time shows that homelessness still happens to people who are working.

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<sup>36</sup> Keas, Miranda, 2019, *Galvanise Brighton & Hove: Findings from Galvanise 2019. Part of Brighton & Hove's Campaign to End Street Homelessness.*

- Many people surveyed experience cycles of going in and out of prison, and experience cycles of being housed and returning to the streets. This suggests a need for more consistent ongoing support and further examination of how to break these cycles.
- 40% of people said they have a serious or chronic health issue and almost a quarter are not registered with a GP
- Whilst some people have chosen to sleep in Brighton & Hove because it feels safe, safety is a real concern for many rough sleepers and 45% have been the victims of violence since becoming homeless
- 61% of people feel they have a mental health issue but only 27% are receiving support or treatment for this. Additionally, a few people expressed having made suicide attempts or having thoughts of suicide, indicating the severity of risk of untreated mental health.
- Day centres and the library are really relied on and valued by rough sleepers
- There is a real demand for more weekend services and many suggestions for additional services that would be useful
- Unsurprisingly, the main things that people want help with are support and housing. However, the availability of housing is a concern for rough sleepers, as is the difficulty in navigating housing systems and finding landlords who will house them
- The desires that people expressed for the future are much the same as many people: wanting somewhere to live, stability, a family, a job.

### *Migrants, refugees and asylum seekers*

Three migrant homelessness case studies were submitted by Voices in Exile. The case studies highlighted a number of issues including:

- Inadequate recognition of vulnerability
- Systemic issues in the assessment process leading to non-priority decisions
- Post-asylum claim homelessness support is lacking
- Compounding impacts on already vulnerable individuals
- The need for specialist legal and medical support for homeless migrants

Sussex Interpreting Service submitted 4 case studies highlighting the following issues:

- Inadequate language support, poor communication and clients unable to understand the process and consequences of key decisions
- Complex housing systems are particularly difficult to navigate without language support.
- Rapid transitions, particularly from asylum seeker accommodation creates additional hardship and compounds vulnerability

- Inadequate assessment of vulnerability, with medical evidence requirements, and mental health needs and complex needs of single people not taken into account.
- Exclusion from the private rental market, precarious housing situations and accumulation of rent arrears and debt
- System inefficiencies with expensive tribunal processes, multi-agency interventions instead of early intervention and repeat referrals and extended support periods
- Mistrust and miscommunication between applicants and housing support officers

## Evidence from engagement activity

We held 2 whole system engagement events as part of the review process, plus a number of follow meetings with those who could not take part. We also organised 2 online workshops for NHS providers and commissioners, a workshop for councillors and attended other forums to gather input.

The following thematic analysis suggests that while Brighton & Hove has significant challenges in addressing homelessness, there are also opportunities for system improvement through better coordination, early intervention, and innovative approaches to both prevention and support.

### 1. Increasing complexity of individual vulnerabilities & needs

- Mental health emerges as a dominant concern
- Multiple, compound needs frequently highlighted
- Substance use and recovery challenges
- Trauma histories and impacts
- Neurodiversity and learning disabilities
- Domestic abuse survivors
- Care leavers
- Impact of adverse childhood experiences
- Complex needs requiring sustained support

### 2. Other emerging trends & concerns

- Concerns about young people's homelessness
- Rising numbers of refugees/asylum seekers
- More women experiencing homelessness
- Impact of cost-of-living crisis
- Changing demographics
- Hidden homelessness
- Brexit impacts

### 3. Systemic & structural issues

- Housing market pressures (high rents, limited supply)

- Benefits system limitations (Local Housing Allowance inadequacy)
- "Rent trap" preventing work and progression
- Impact of austerity on services
- Complex planning restrictions
- Geographical constraints of Brighton in terms of development potential
- Private rental sector barriers (deposits, guarantors, discrimination)
- AirBnB and second homes reducing housing stock
- Limited social housing availability

#### 4. Existing service strengths

- Range of specialized support services
- Strong peer support initiatives
- Multi-disciplinary approaches
- Trauma-informed services
- Various accommodation pathways
- Good third sector provision
- Volunteer engagement
- Specific support for diverse groups

#### 5. Service delivery challenges

- Crisis management vs prevention
- System blockages preventing move-on
- Support discontinuity
- Limited specialized accommodation (women, couples, LGBTQ+, young people)
- Fragmented pathways
- Staff capacity issues
- Out-of-area placement complications
- Data and monitoring gaps
- Coordination challenges between services

#### 6. Prevention & early intervention needs

- Education and life skills gaps
- Limited early warning systems
- Need for better tenancy sustainment support
- Financial literacy support
- Earlier mental health intervention
- Better identification of at-risk individuals
- Prevention duty awareness
- School-based prevention

#### 7. Resourcing & Partnership Issues and Opportunities

- Funding uncertainty
- Opportunities for better business engagement
- Better cross-service coordination
- Partnership working challenges
- Resource optimization opportunities
- Joint commissioning potential

- Better use of existing assets
- Need for sustainable funding models

#### 8. innovation & creative solutions opportunities

- Potential for centralized hub service model
- Better use of peer support
- Digital coordination improvements
- Alternative housing models
- Business community engagement
- Devolution possibilities
- Learning from other cities
- Personalized budget approaches



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## Consultation plan

Name of consultation	Draft homelessness and rough sleeping strategy 2025 to 2030
Why do you need to consult? (Brief Summary)	Under the Housing Act 2002 (as amended by the Homelessness Act 2017) there a statutory requirement for every local housing authority to review homelessness in their area and to develop and publish a homelessness and rough sleeping strategy at least every five years. While there is no legal obligation to consult on the strategy, best practice guidance and the council's engagement framework indicate that we should seek to consult interested parties for a period of six to twelve weeks.
What are the main aims and objectives?	To develop proposed strategic priorities and areas for action with stakeholders and other interested parties.
What do you need to find out? (Essential)	Do residents (including people with lived experience of homelessness), partners and other interested parties support the proposed priorities?
What do you need to find out? (Desirable)	Do stakeholders have suggestions and ideas about how the council and its partners can best collaborate to deliver improved homelessness outcomes for the city?
What do you already know? (from previous consultation, knowledge or experience)	We have used council and partner data to examine trends in homelessness in the city over the last 5 years. We have also undertaken engagement exercises with stakeholders to inform the review of homelessness and the pre-consultation phase of strategy development. This includes in person and online workshops explore trends in homelessness and to map services, activities and resources to address homelessness in the city. We also engaged with existing networks and forums including the Homeless and Rough Sleeping Network, the Youth Homelessness Working Group, the Homeless Operational Forum, the Violence Against Women and Girls Network and others. We have had input from people with lived experience of homeless, supported by Common Ambition and Justlife during the first two phases of the work to develop the strategy. The review of homelessness also examined other relevant consultation exercises, for example, homeless pathway mapping by Common Ambition and service mapping led by Justlife as well as other consultations, e.g work to develop the recent housing strategy and violence against women and girls strategy.
Who will you consult with?	<p>Any interested party will be able to respond during the public consultation phase. This includes residents, community groups, and organisations delivering services in the city. It also includes regional and national bodies who have an interest. Other interested parties (for example, people who currently do not live in the city) will be able to submit a response.</p> <p>The initial equality impact assessment indicates that particular attention should be given to seeking responses from individuals with protected and other characteristics as set out in the council's EIA Toolkit 2023. We will actively seek feedback from people with lived experience of homelessness and from groups who are at higher risk of becoming homelessness or at higher risk when homeless, for</p>

Name of consultation	Draft homelessness and rough sleeping strategy 2025 to 2030
	example, people experiencing mental health issues, disabled people care leavers, people from some Black and racially minoritised groups and others.
When will you consult?	Formal public consultation will run for a period of 7 weeks from 8 September to 26 October 2025.
How will you consult?	<p>We will use a mixed methods approach. We will publish and promote a survey on the council’s consultation platform Your Voice. Printed copies of the survey in Easy Read, large print and the most common community languages will be available for download or on request. The consultation will be promoted by the council’s communication team and through mailing lists of partners and community groups across the city.</p> <p>We will also design a simple set of questions that can be used with individuals and small groups in</p> <p>People with lived experience of homelessness and people from groups with protected and other characteristics will be targeted through focused promotion of the consultation – for example, reaching out to community groups and organisations working with or supporting people with specific characteristics or intersecting characteristics. We will work with Common Ambition, Justlife, the Homelessness &amp; Rough Sleeping Network membership and with a reference group of workers and managers from frontline services to engage people with lived experience of homelessness.</p> <p>We do not have capacity to respond to request for speakers however we will provide downloadable resource materials including an Easy Read guide to the strategy and Easy Read survey for community groups and others who wish to engage their members or service users in making a response.</p>
How will the consultation be communicated/ publicised?	Through the council consultation portal, broadcast and targeted social media, press release, staff networks, promotional material in libraries, family hubs and other public facilities, mailout to strategic partners including the Homeless & Rough Sleeping Network and Community Works, targeted mailouts to lists held by equalities and community engagement teams. We will also promote through word of mouth to reach seldom heard groups.
Who will monitor responses and provide updates on results?	The homelessness and rough sleeping strategy project steering group will review reports on progress with the consultation and assess whether further work is needed to reach groups of stakeholders who are underrepresented in responses.
Who will analyse the results from the consultation?	Project group.

Name of consultation	Draft homelessness and rough sleeping strategy 2025 to 2030
Who will act on the consultation?	The council and its partners in developing a final strategy and in developing an action plan to deliver the strategy.
Who will the results be reported to and when?	Council Cabinet December 2025 The consultation report will be published on the council consultation website and shared with partners.
How will you provide feedback to respondents and when?	With committee report, on council consultation portal and through a written report for sharing with partners.
Who will evaluate how successful the consultation has been and when?	Project group as part of project closure report.

Consultation timetable outline

Action	Dates
Engage DLT, lead member and policy advisor on consultation plan	July
Project group agree final consultation plan, including final consultation questions	July
Begin web design, set up and testing of consultation portal survey	August
Consultation supporting materials finalised	31 August
Consultation launch	8 September
Consultation responses analysed and considered by project group	October/November
Publication of consultation response	December
Final draft strategy to Cabinet	December



# Brighton & Hove City Council

## Overview & Scrutiny

## Agenda Item

**Subject:** Housing Hate Incident Policy

**Date of meeting:** 8 October 2025

**Report of:** Genette Laws, Corporate Director – Homes and Adult Social Care

**Contact Officer:** Harry Williams, Director for Housing People Services  
Justine Harris, Head of Tenancy Services

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

**Key Decision:** Yes

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

- 1.1 The Council's social landlord duties cover 12,145 rented properties and 2,210 leasehold properties (as of January 2025). The Social Housing Regulation Act 2023 (SHRA) placed a duty on social landlords to consult and publish a Hate Incident Policy.
- 1.2 The draft Housing Hate Incident policy supports the Council's compliance with the SHRA and meets the expectations of the Regulator of Social Housing including:
  - The Neighbourhood & Community Standard 2.2.2. This requires social landlords to clearly set out their approach for how they deter, and tackle hate incidents in neighbourhoods where they provide housing.
  - The Tenant Satisfaction Measures, particularly NM01, which tracks anti-social behaviour cases involving hate incidents per 1,000 homes.
- 1.3 The draft Housing Hate Incident policy aligns with the Council's [Anti-Racism Strategy](#), Equality Act 2010 obligations. The policy also aligns with the aims within the [Housing Strategy 2024 – 2029](#) to “work with residents and our partners to develop safe, healthy and inclusive estates and neighbourhoods (4.1)” and outcome 2 of the [Council Plan 2023 – 2027](#), to create a fair and inclusive city.
- 1.4 The draft Housing Hate Incident policy builds on the current service offer under the Housing [Anti-Social behaviour policy](#) with key additions to the following areas: Scope, additional measures to support victims, senior oversight, performance reporting, staff training and awareness.

## **2. Recommendations**

- 2.1 Overview & Scrutiny Committee review and comment on the draft Housing Hate Incident Policy (Appendix 1) ahead of adoption by the Council's Housing service.
- 2.2 Overview & Scrutiny Committee note the consultation report (Appendix 2)

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

- 3.1 The draft policy is a statement of intent concerning how Housing will tackle hate incidents experienced by its residents. It includes definition of hate incidents, how Housing will respond to reports of hate incidents and ensure that victims receive appropriate support. This includes tenants living in Seniors Housing, Seaside Homes and other forms of temporary accommodation in our housing stock.
- 3.2 A hate incident refers to any action that is perceived by the victim, or by any other person, to be motivated by hostility or prejudice based on an individual's perceived personal characteristics. These characteristics include disability, race or ethnic identity, religion or belief, gender or gender identity, and sexual orientation.
- 3.3 Hate behaviour can be directed towards individuals or groups, and may also target people who are associated with others possessing one or more of the listed characteristics.
- 3.2 In line with the Social Housing Regulator's Neighbourhood and Community Standard, the policy outlines a comprehensive approach to preventing and managing hate-related behaviour associated with its housing stock.
- 3.3 This policy extends to victims and witnesses who reside in or visit council-managed properties, as well as those in other tenures who are affected by hate motivated behaviour of residents or visitors in the locality of these homes. Perpetrators are included — whether they live in council housing, visit council properties, or are external individuals whose hate-motivated behaviour impacts the Council's housing management responsibilities.
- 3.4 Data on hate incidents will be monitored and reviewed annually to improve oversight of case handling. We will take into consideration and respond to the impact of external factors, which may place individuals or communities at heightened risk.
- 3.5 Housing are aiming to fully implement the final policy by March 2026.

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

- 4.1 Not applicable as this is a statutory requirement

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

- 5.1 An 11-week formal consultation with residents on the draft policy was carried out. This was done using our online consultation portal 'Your Voice', with option to provide responses via phone.
- 5.2 We reached out to third sector organisations and community groups and promoted the consultation on social media, posters, plasma screens in libraries & Hove Town Hall, included an article in the Council's tenant and leaseholder newsletter, Homing In and by reaching out via texts / emails to tenants.
- 5.3 An Easy Read survey was produced for us by Speak Out. The guide was made available as hard copy and for download on Your Voice. Large print, hard copy surveys were available on request by email or phone.
- 5.4 Two in person consultation sessions were held and completion of the survey was promoted amongst tenant reps at Area Panel and the Annual Tenant Conference. The eight-week consultation was extended for a further three weeks allowing for further communication to increase the response rate and engagement.
- 5.5 57 responses to the main online consultation survey on the draft policy were received and nine responses to a supplementary survey from residents with experience of reporting hate incidents to Housing. 91.2% of responses were from individuals and 8.8% of responses were on behalf of a group or organisation.
- 5.6 Residents were asked for their views on proposals relating to supporting victims, reporting hate incidents to Housing, keeping residents informed and taking appropriate action.
- 5.7 Agreement with each of the proposals by respondents to the consultation ranged from 53.4% to 73.4%. However, just 31.6% of respondents agreed that the council is doing enough to promote awareness of action Housing can take in response to hate incidents and a sizeable minority (21.1%) felt that it wasn't clear on how to report hate incidents.
- 5.8 Residents were asked to make suggestions on how Housing can improve our response to hate incidents. Common themes were communication, staff training, referral to support, accessibility, improving awareness and information, and taking action.
- 5.9 Although a small sample size, feedback from the lived experience survey raised important issues in relation to staff training, communication, and lack of action and indicated that many victims did not feel supported.
- 5.10 A workshop was held with service managers in February 2025 to review and discuss how to implement key consultation feedback in the final policy.
- 5.11 A consultation report has been drafted (Appendix 2). It is proposed that the executive summary, consultation outcome & next steps section will be published on Your Voice (with the option to request the report in full).

## **6. Financial implications**

The cost of the training programme is to be determined but will be met from within existing resources.

Name of finance officer consulted: Mike Bentley  
September 2025

Date consulted 25<sup>th</sup>

## **7. Legal implications**

- 7.1 As stated there is now legal requirement for the Council to have a published policy with regards to anti-social behavior and hate incidents. We already have a published anti-social behaviour policy. The Housing Hate Incident policy fulfills the requirement of the legislation. This is to be differentiated on the general requirements put on the whole authority under the Crime and Disorder Act to have a similar policy in place. There are clearly cross over areas, but there are sufficient areas of difference between the objectives, that is correct to have a separate policy purely for housing. The regulator standards are still developing but this policy in our view meets the standards as currently drawn. In the event that the standards vary significantly then the documents would have to be revisited.

**Name of lawyer consulted** Simon Court    **Date consulted** 23 July 2025

## **8. Equalities implications**

- 8.1 The policy is expected to have a positive impact on all protected groups through the provision of a robust and consistent approach that is victim-centred, considering the needs and vulnerabilities of those experiencing and perpetrating hate Incidents.
- 8.2 To enhance the management of hate incidents within housing services, five strategic activities have been proposed to address potential disproportionate and cumulative impacts identified within the Equality Impact Assessment (Appendix 3):
- 8.3 The first focuses on improving data collection methods to ensure equalities strand information is accurately recorded for at least 75% of people involved in cases. Completion is targeted within one year to ensure demographic data informs future policy decisions.
- 8.4 The second activity introduces a senior oversight role for all hate incident cases, to be implemented within the first three months of policy adoption. This role will ensure each case includes a completed risk assessment, tailored action plan, appropriate referrals, and consideration of enforcement proportionality. Oversight will also involve multi-agency collaboration and annual reviews to uphold a victim-centred approach.
- 8.5 The third activity ensures frontline housing staff receive training on hate incidents within six months of policy launch. Training will cover

proportionality, mental health awareness, and intersectionality. Attendance and feedback will be monitored, and future training needs identified and coordinated by the senior oversight role in collaboration with relevant internal teams.

- 8.6 Activity four involves reviewing the effectiveness of policy implementation after the first year. Key performance indicators include satisfaction levels, complaints, case outcomes, training success, and identified trends. Feedback from agencies such as Victim Support will inform any necessary policy amendments and staff development, ensuring equitable outcomes for all service users.
- 8.7 The fifth activity prioritises improving access to the hate incident reporting service. Adjustments will include enabling reporting by third parties, signposting to advocacy support, and offering alternative formats such as large print, translated documents, and digital communications. A supporting procedure will guide officers in implementing these measures, with oversight ensuring adjustments are recorded in support plans. These changes will be in place within the first three months to ensure inclusivity from the outset.

## **9. Sustainability implications**

- 9.1 N/A

## **10. Health and Wellbeing Implications:**

- 10.1 Having a robust response to hate incidents is essential due to the profound impact hate incidents have not only on the immediate victim but also on communities.

## **Other Implications**

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

- 12.1 Aligns with overall aim of Council's Hate Incident and crimes action plan 2024 - 25 led by Community Safety Team: An increase in reporting and trust and confidence in statutory services, and a reduction in hate incidents and crimes, and the harm caused to individuals and communities (forms part of Anti-Racism Strategy 2023 to 2028)

## **13. Conclusion**

- 13.1 Registered providers of social housing are required to publish a policy on how they work with relevant partners to prevent and tackle anti-social behaviour and hate incidents in areas where they own and manage properties.
- 13.2 Implementing a clear policy ensures consistent procedures for reporting, recording, and responding to hate incidents. It sets out service standards, while also encouraging reporting and improving data collection which will be

used to drive service improvement, helping Housing services to identify patterns and intervene early to prevent escalation.

## **Supporting Documentation**

### **1. Appendices**

Appendix 1 – Final draft of hate incident policy for Housing

Appendix 2 – Consultation report

Appendix 3 – Equality Impact Assessment

# Housing

## Tenancy Management Policy

### Housing Hate Incident Policy

#### 1.0 Introduction

- 1.1 Hate incidents have a significant and often lasting impact on individuals and their communities. When people are targeted because of their disability, ethnicity or race, religion or faith, sexual orientation or transgender identity, the harm goes beyond the immediate incident and has a significant effect on their quality of life, wellbeing and feelings of safety.
- 1.2 We want all tenants and leaseholders to feel safe and supported when reporting hate incidents to us. Brighton & Hove City Council is committed to creating a culture of trust and respect, where individuals feel confident that their concerns will be taken seriously and handled sensitively. We understand that reporting can be difficult, and we aim to make the process as accessible and reassuring as possible, ensuring that victims are listened to and supported, and the behaviours or actions of perpetrators are tackled, and where possible, prevented.
- 1.3 This policy covers how we as a council will deal with hate incidents affecting tenants and leaseholders in housing provided by Brighton & Hove City Council. This includes people who live in our Seaside Homes and Temporary Accommodation homes.
- 1.4 If you require assistance with translation of this policy, large print, easy read, braille, or an audio copy, contact us by phone on 01273 293030 or by email [housing.customerservices@brighton-hove.gov.uk](mailto:housing.customerservices@brighton-hove.gov.uk).

#### 2.0 Scope

- 2.1 Brighton & Hove City Council is committed to preventing, tackling and managing hate incidents (and anti-social behaviour) in accordance with the Housing Regulator's Standard. Under the Neighbourhood and Community Standard, registered providers of social housing are required to publish a policy on how they work with relevant partners to prevent and tackle anti-social behaviour (ASB) & hate incidents in areas where they own and manage properties.
- 2.2 This policy sets out our approach to dealing with hate related behaviour and applies to:

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- Those who are victims and witnesses of hate related behaviour and live in our homes or visit our properties
- Those who are victims and witnesses and are not our tenants but are experiencing hate related behaviour being perpetrated by people who live in our homes or regularly visit our properties
- Those who are the perpetrators of hate related behaviour and live in our homes or visit our properties
- Those who are the perpetrators of hate related behaviour and are not our tenants but are perpetrating conduct motivated by hate and their conduct is having a direct impact on our housing management functions

2.3 This includes people who live in our general needs' accommodation, Seniors schemes, leaseholders, Temporary Accommodation and Seaside Homes as well as people who live in other tenures (where their conduct is having a direct impact on our housing management function).

### **3.0 Strategic Statement**

3.1 To achieve this, we aim to:

- Ensure information on how to report hate incidents is clear to understand and easily available to all tenants.
- We will take active steps to investigate whether any anti-social act or acts of nuisance or annoyance might be motivated by hate.
- We will take a victim centred approach, and an incident will be investigated as a hate incident where the victim perceives it as such.
- We will take steps to prevent hate related behaviour from happening. Where it does, we aim to take swift and effective action to find a resolution.
- Our focus is on reducing the harm caused to the victim and communities. We will signpost victims to access support tailored to their individual needs. We will also focus on providing support where perpetrator has vulnerabilities that cause, or contribute to, the situation.
- We will work in partnership with the police, Community Safety Team, other agencies, and members of the community to address all forms of hate incidents, take action against offenders and protect victims. This will ensure that Brighton & Hove is a safe & secure place to live, work and visit.
- Victims will be provided a point of contact and will be asked how they would like to keep in contact to report further incidents and how often they would like to receive feedback.
- We will use the legal and civil tools and powers available to us to tackle hate incidents.



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- We will monitor and evaluate the effectiveness of our services in addressing hate incidents, reporting our performance and making changes where necessary in relation to best practice and resident feedback.

3.2 This policy compliments our [Anti social behaviour policy](#) and where appropriate should be read in conjunction with it.

### 4.0 Definition

4.1 A **hate incident** is any incident that is perceived by the victim or any other person as being motivated by a hostility or prejudice based on a persons perceived:

- disability
- race or ethnic identity
- religion/belief
- gender or gender identity
- sexual orientation

4.2 Hate behaviour can be displayed against individuals or groups. People can be targeted due to their association with individuals who have the above personal characteristics.

4.3 Hate incidents can take many forms including; verbal abuse or harassment which includes name calling, spitting, physical attacks or violence, damage to property including offensive graffiti, arson (fire), threats and intimidation and offensive literature (such as letters, emails, posters and social media).

4.4 Any criminal offence which is perceived by the victim, or any other person, to be motivated by hostility or prejudice towards a personal characteristic or the perception of the person of having any of these characteristics is a hate crime. Hate crime can take many forms, including but not limited to: physical assault, verbal abuse, incitement to hatred, threats of attack and criminal damage.

4.5 For information about domestic abuse and related issues of gender violence, including forced marriage and sexual violence, please refer to our [website](#).

### 5.0 How to report a hate incident

5.1 Anyone can report a hate incident or hate crime including:

- the victim or any person who has been directly affected
- anybody who witnessed the incident

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- any third party, including family, friends, neighbours, support workers and advocates, community leaders, including religious leaders, Councillors and MPs.

5.2 An incident can be considered a hate incident if either the victim, or any other person perceives it to be motivated by hostility or prejudice against an **identifiable group of people**.

### 5.3 Report to Sussex Police

- If you experience any form of hate incident or crime, reporting your situation can help ensure that the incident does not continue. Reporting may also help prevent these crimes and incidents from happening to someone else. This helps the police to understand the extent of hate crime in your area and better respond to incidents of hate crime.
- If you feel in immediate danger or in an emergency phone 999 and ask for the police.
- If it is not an emergency, you can contact the police by phoning 101.
- You can also report [online](#).

### 5.4 Report to Brighton & Hove City Council Housing

We will investigate all incidents reported to us irrespective of reporter and process information given to us in line with the Data Protection Act 2018 and our [privacy notice](#). It is possible to make an anonymous report using the online reporting form; however, it is likely that we will be very limited in the actions we can take and will not be able to share any updates with the reporter. For more information see **14.0 Data Protection, Confidentiality & Information exchange**.

Council tenants, council leaseholders and tenants of leaseholders should report hate incidents to Housing Customer Services by:

- phone 01273 293030
- email [Housing.CustomerServices@brighton-hove.gov.uk](mailto:Housing.CustomerServices@brighton-hove.gov.uk)
- completing the [online](#) reporting form

Seniors housing tenants may also speak to their scheme manager.

Seaside Homes and Temporary Accommodation tenants should report hate incidents to Temporary Accommodation by:

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- phone 01273 294400 (option 4, option 1)
- email [temporary.accommodation@brighton-hove.gov.uk](mailto:temporary.accommodation@brighton-hove.gov.uk)
- completing the [online](#) reporting form

Housing association tenants should report hate incidents to their housing provider. Brighton & Hove City Council cannot intervene in housing association cases.

### 5.5 Report to a third-party organisation

True Vision is a national online service where you can report hate incidents or crimes that you may have been the victim of, witnessed, or are reporting on behalf of someone else. You can give as much or as little personal details as you choose. You can report anonymously, if you want to.

If you're reporting a crime, the police will create a crime report and investigate.

If you've given your contact details, the police will contact you according to your consent.

If you do not provide personal details, the self-reporting forms will be used to monitor the incidents.

- [True Vision website](#)

If you do not want to report online, you can download and print a reporting form, which are available in easy read and a number of other languages.

- [True Vision Information and reporting packs - True Vision](#)

### 6.0 Reporting a safeguarding concern

- 6.1 If you are concerned about an adult in Brighton and Hove at risk of abuse or neglect you can report a safeguarding concern online at: [Report a safeguarding concern](#) or phone 01273 295555.
- 6.2 If you are worried about a child, you can report a safeguarding concern online at: [Refer a child or family to Front Door for Families](#) or phone 01273 290400.
- 6.3 If you feel that somebody is at immediate risk of harm and it is an emergency, call 999.

### 7.0 Policy

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- 7.1 Wherever possible we will contact the victim within one working day of the report of the incident.
- 7.2 We will aim to include an advocate in meetings as requested by the victim and offer option of keeping a nominated representative, such as next of kin or support worker informed.
- 7.3 The victim's perception of the incident is all-important, and no evidence of the incident will be required during the first contact.
- 7.4 During the first contact, we will carry out an initial assessment taking into consideration the needs of the victim to ensure that any action is victim led. We will advise as necessary if another service needs to take the lead (such as Sussex Police or a Housing Association).
- 7.5 We will let the victim know what action we will be taking and indicate how long we believe this will take.
- 7.6 We will keep victims up to date with our actions and check in on their welfare using their preferred method of contact and agreed frequency of contact. We will do this until the case is closed.
- 7.7 We will ensure victims have access to a copy of the hate incident policy and we will signpost to local support and advice services where appropriate.
- 7.8 If we are concerned about a victim's (or household member's) immediate safety or welfare, we may share information with police or make statutory referrals to social services.
- 7.9 We will make residents aware of the [ASB & hate incident case review](#), formerly known as the Community Trigger.
- 7.10 Whilst we encourage residents to inform the police of any notifiable incidents, we will not make this a condition of providing support or assistance to them.
- 7.11 We will ensure victims are clear on how to report further incidents and provide diary sheets (where appropriate).
- 7.12 Our Complex Case & Temporary Accommodation Managers will be aware of each report of hate crime to ensure responses to incidents can be monitored and followed up at a senior level in Housing Services.

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- 7.13 We will regularly review cases and close them at the appropriate time. We will aim to do this only when the situation is resolved, and no further action is required or because we are unable to find evidence to take further action.
- 7.14 We will aim to offer to meet with the victim before closing the case.
- 7.15 We will use the victim's preferred method of contact to tell them that we intend to close the case and why. Where necessary we will also give them advice on what to do next and either reiterate this in writing or using the victim's preferred method of contact.
- 7.16 We will treat any future report from the victim as a hate incident if the victim reports it as such and depending on the specifics of the situation, we may start a new investigation or escalate the case from the last action.
- 7.17 In some cases, we may decide that a new investigation is not required, for example where the report is of a substantially similar nature to something we have already investigated and concluded that action is not possible. We will explain what we are doing and why to the person making the report.

### **8.0 Prevention & Support**

- 8.1 We recognise that hate-related behaviour and hate crimes have a profoundly devastating impact on victims and witnesses, often greater than the effects of non-hate motivated offences. We understand the harm these acts cause and impact it has on quality of life.
- 8.2 Victims may also experience compounded trauma due to the intersection of multiple marginalized identities, such as race, gender, sexual orientation, disability, or religion. This intersectionality can result in more severe and complex consequences, affecting not only the immediate victims but also their communities. As a result, ripple effects of hate crimes extend beyond the initial incident, significantly diminishing the quality of life for affected individuals and groups.
- 8.3 The volatile nature of today's socio-political landscape, often heightened by the media and global conflicts, has created an environment where certain groups face heightened vulnerability. We will consider and respond to the impact of these external factors on both perceived and actual risks to individuals and communities.
- 8.4 We will therefore provide a service focussing on the victim by assessing the impact with awareness of these factors and tailoring support based on individual needs.



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- 8.5 We will keep in regular contact with victims and witnesses throughout the investigation. We'll ensure they understand what action we are taking and why.
- 8.6 We will give advice, support and guidance throughout our investigation.
- 8.7 Examples of how we may support victims and witnesses based on their individual circumstances include:
- providing a single point of contact, usually a Housing Officer or Scheme Manager
  - agree an action plan following an individual assessment
  - offer of referral or signposting to other organisations for support and advocacy, such as Victim Support
  - visits to court before a hearing
  - application for special measures, which includes options such as giving evidence behind screens or via video link in a different room
  - advice and/or support through any legal hearings
  - provide additional security measures, such as new locks, where appropriate
  - carry out any repairs resulting from a hate incident as a priority, where appropriate
  - removing graffiti from our properties & estates
- 8.8 Where there are multiple cases in a neighbourhood, a lead officer will co-ordinate the response, including referring to the Joint Action Group (JAG), to ensure strong communication with all the victims and witnesses.
- 8.9 We are committed to ensuring that victims can remain in their home whenever possible. However, in exceptional circumstances and when the victim is at risk of serious physical harm and we are unable to resolve the situation in other ways, we may offer emergency accommodation and work with the victim to explore longer-term housing options. In very exceptional cases, this may result in a priority transfer in accordance with the Allocations Policy.
- 8.10 Where possible we want to make sure hate incidents do not happen in the first place. We do this by:
- Encourage reporting by increasing awareness amongst residents of what constitutes a hate-related incident through publicising information and advice.
  - Ensuring new tenants understand their rights and responsibilities and what will happen if they breach their tenancy conditions.

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- Issuing introductory tenancies for an initial one-year period to tenants moving into general needs who have not held a social housing tenancy before.
- Publicising our strong approach to stopping hate behaviour and the cases where we have taken legal action.
- Tailoring support to meet individual needs.
- Working with teams such as the Community Engagement Team and Community Safety Team on community cohesion initiatives.
- Use of sensitive lets where appropriate.
- Frontline teams to be kept up to date on any community tensions in line with data sharing protocols.
- Ensuring tenants, contractors and staff feel comfortable to challenge prejudice and stereotyping.
- Identify and support people who are susceptible to radicalisation, referring to PREVENT for early intervention to reduce the risk and harms of terrorism. For further information, visit [Prevent - preventing terrorism \(brighton-hove.gov.uk\)](https://www.brighton-hove.gov.uk/prevent-preventing-terrorism).

### 9.0 Taking action

- 9.1 Council housing tenants and leaseholders are required to comply with the conditions set out in their tenancy agreement and lease. We will take appropriate action, in line with the relevant policy/procedure, if the conditions are breached.
- 9.2 We will take victims views into consideration when deciding what action to take and be victim centred in our approach.
- 9.3 We will decide on the most appropriate action based on factors such as the:
  - Evidence available
  - Impact on the victim
  - Best way to achieve a lasting solution
- 9.4 Gathering evidence may include witness statements, officer observations, incident diaries, CCTV and working with other agencies, such as Sussex Police.
- 9.5 We will be clear with victims about what can and cannot be achieved and be realistic about possible outcomes.
- 9.6 Where there is evidence of hate behaviour appropriate action will be taken. The action we take will be proportionate to the behaviour exhibited and circumstances of the case, alongside the options available to Housing. The

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full range of civil legal remedies will be considered including the powers established by the Anti-social Behaviour, Crime and Policing Act 2014, which may include injunctions and possession proceedings. We will also use restorative practice where appropriate to reduce harm and change behaviour. For more details, please see the [Anti-social Behaviour policy](#).

9.7 If we establish no evidence of targeted harassment, we will continue to deal with the matter in line with our ASB policy and seek to defuse tensions between the victim and the perpetrator, for example, through mediation.

9.8 We will refer homeowners or those in privately rented accommodation to the Community Safety Team as appropriate, in line with the joint working agreement between our services.

### **10.0 Working with perpetrators**

10.1 Where necessary, we will work with the person responsible for the hate behaviour to identify support needs which may address the underlying causes of their behaviour. This may include reasons such as drug or alcohol addiction, mental health issues or support with parenting.

10.2 We will work with partner agencies in seeking to address and support the underlying issues, which may be the best way to prevent further unacceptable behaviour. Providing support for perpetrators does not prevent us taking enforcement action when it is necessary to do so. It is also important to note that there are rare occasions where someone cannot control their behaviour. In these cases, we will look at other ways of dealing with the situation.

10.3 If someone has been offered support but does not engage and their hate behaviour continues, we will take appropriate action. We will ensure that any action we take is reasonable and proportionate and meets our obligations under the Equality Act 2010 and any other relevant legislation. We will make reasonable adjustments to our policy and procedures where appropriate.

### **11.0 ASB & hate incident case review**

11.1 The ASB & hate incident case review (previously known as the 'Community Trigger') is a process available to people who are harmed by anti-social behaviour and/or hate incidents and feel that the organisations involved are not doing enough to resolve the problem.

11.2 The ASB & hate incident case review can be raised with Brighton & Hove City Council or Sussex Police. Where it meets the criteria, the Housing Team, alongside any other organisations involved in a case, will review the action



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that has been taken and make recommendations if there are additional actions that can be taken.

- 11.3 Further information about ASB case reviews can be found on the [Brighton & Hove City Council](#) or Sussex Police websites or by telephoning Housing Customer Services on (01273) 293030 or emailing [housing.customerservices@brighton-hove.gov.uk](mailto:housing.customerservices@brighton-hove.gov.uk).

### **12.0 Partnership working**

- 12.1 We will work in partnership with other organisations and council teams to prevent and tackle hate behaviour, whilst supporting those involved.
- 12.2 We encourage victims of a potential hate crime to report this to the police and will not report an incident to the police without permission of the victim unless there is a risk of harm or criminal activity.
- 12.3 We work closely with the police to collect evidence, such as CCTV and co-ordinate actions, such as taking tenancy action following a criminal conviction.
- 12.4 We may provide support or make referrals to specialist hate support services who can offer a range of services including safety planning advice, support with attending court, emotional support and counselling.
- 12.5 We work closely with Adult Social Care and Front Door for Families where there are safeguarding concerns and will act in accordance with our safeguarding policy.
- 12.6 The monthly Hate and ASB Risk Assessment Conference (HASBRAC) addresses the harm caused to victims of hate incidents and crimes through supportive interventions and manages the behaviour of priority and repeat perpetrators. Perpetrators are offered appropriate interventions to address their behaviour and enforcement is used when necessary.
- 12.7 We will ensure that offensive graffiti is removed within 24 hours of it being reported.

### **13.0 Supporting staff**

- 13.1 We understand that staff may find investigating hate-related incidents upsetting and stressful. We will ensure that staff are properly supported by their managers and are made aware of how to access free counselling available to employees of Brighton & Hove City Council.

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- 13.2 Wherever possible we provide training and guidance to staff on how to respond to hate incidents, which includes using a trauma informed approach. We also ensure that staff are informed of the local support agencies available for victims of hate incidents.
- 13.3 All staff receive equality and diversity training. We promote a safe and diverse working environment for staff and contractors.
- 13.4 We do not tolerate abusive behaviour towards staff and will take action against residents, where the staff member provides consent.

### **14.0 Data Protection, Confidentiality & Information exchange**

- 14.1 We have a duty to disclose information about, or provided by, a complainant if there are safeguarding issues that could impact on the safety of children or adults at risk or where there may have been a crime committed. We will therefore disclose to safeguard and fulfil any other statutory duty including those duties under the Crime and Disorder 1998 Act and Anti-Social Behaviour, Crime & Policy 2014 Act.
- 14.2 All information shared in respect of victims and perpetrators will adhere to the principles of the UK General Data Protection Regulation (UK GDPR) and Data Protection Act (DPA) 2018, as it relates to information sharing between agencies for the purposes of the reduction of crime and disorder.
- 14.3 All personal or sensitive data will be processed in line with the Data Protection Act 2018 (as amended) and our [Housing Service's privacy notice](#). Further information on the way we process & share information to tackle anti-social behaviour and hate incidents is covered in the [Housing Service privacy notice for sharing information in relation to ASB & hate incidents](#).

### **15.0 Complaints**

- 15.1 We will seek to fully resolve any concerns about our service and ask that residents get in touch with us directly, so that we have the opportunity to put things right. If the concern relates to council housing, Housing Customer Services can be contacted on 01273 203030 or [housing.customerservices@brighton-hove.gov.uk](mailto:housing.customerservices@brighton-hove.gov.uk). If the concerns relates to Temporary Accommodation, the team can be contacted on 01273 294400 or [temporary.accommodation@brighton-hove.gov.uk](mailto:temporary.accommodation@brighton-hove.gov.uk).

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- 15.2 If the concern is not resolved to the resident's satisfaction, a complaint can be made using our [corporate complaints procedure](#).
- 15.3 Residents who are not satisfied following our formal complaints process should contact the Housing Ombudsman. Further details about the advice, mediation and complaint resolution role of the Housing Ombudsman Service is available [online](#), or by phoning 0300 111 3000 or emailing [info@housing-ombudsman.org.uk](mailto:info@housing-ombudsman.org.uk).
- 15.4 More information is available in our [Corporate Complaints Policy and Procedure](#).

### **16.0 Monitoring & measuring performance**

- 16.1 We will monitor and learn from the feedback we receive about how we manage and respond to hate related cases to ensure a high standard of our services, in line with the Tenants Satisfaction Measures Standard introduced by the Regulator for Social Housing.
- 16.2 We will measure our service based on customer satisfaction. We will aim to send a customer survey with the case closure letter for each case. We ask questions such as how satisfied they were with:
- How their case was handled by the Housing Officer
  - The service they received throughout the investigation
  - The outcome of their report
- 16.3 We will ensure our performance results are available to residents on our [website](#).
- 16.4 The number of new hate incident cases, including by type and locality, will be publicised on the website annually and in Homing In.
- 16.5 We will review cases and outcomes on an annual basis.
- 16.6 We will also look at identifying trends in hate crime, where they are occurring around our estates, looking to adapt services to assist with prevention.
- 16.7 Housing has clear written procedures to enable staff to implement this policy. These are regularly reviewed and updated following relevant changes to legislation, regulation or policy.
- 16.8 Staff are trained to recognise hate incidents, how to respond and take action.

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### **17.0 Roles and Responsibilities**

- 17.1 The Director Housing People Services and Director of Homes and Investment have overall responsibility for this policy and for ensuring that its principles are understood. The Head of Tenancy Services and Head of Temporary & Supported Accommodation are responsible for the implementation and review of this policy. This will be achieved through planning and implementing procedures and processes to support the policy.

### **18.0 Consultation**

- 18.1 In developing this policy residents' views and feedback have been considered, including an analysis of formal complaints and a public consultation.
- 18.2 Consultation on this policy has taken place with residents, managers and staff within Housing, Community Safety Team, Legal Services, local third sector organisations and the Sussex Police Hate Crime Lead.

### **19.0 Equalities**

- 19.1 This Policy has been subject to an Equalities Impact Assessment and will be implemented in accordance with our responsibilities and duties under relevant legislation, including the Equalities Act 2010. To request a copy of this assessment, please contact us at [housing.performance@brighton-hove.gov.uk](mailto:housing.performance@brighton-hove.gov.uk).
- 19.2 We will act sensitively towards the diverse needs of individuals and communities, and we will take positive action to reduce discrimination and harassment.
- 19.3 We will provide information in languages other than English.
- 19.4 We will provide information in alternative formats including braille, large print, easy read and audiotape.
- 19.5 Our receptions and interview rooms are fitted with a hearing loop system.
- 19.6 Alternatives to written incident diary sheets, such as the use of voice recording technology will be offered.
- 19.7 We provide support with translation. We do not expect friends or relatives to interpret for victims but will accept translations from them if requested by the

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victim. We won't rely on children who are under 18 to translate or provide reports.

### 20.0 Legislative Framework

- ASB Crime and Policing Act 2014
- Equality Act 2010
- Housing Acts 1985, 1988, 1996 and 2004
- ASB Act 2003
- Care Act 2014
- Crime and Disorder Act 1998
- GDPR 2018
- Data Protection Act 2000
- Protection from Harassment Act 1997
- Racial and Religious Hatred Act 2006
- Policing and Crime Act 2009
- Police Reform and Social Responsibility Act 2011
- Criminal Justice Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- The Human Rights Act 1998
- Domestic Abuse Act 2021
- Public Order Act 1986
- The Care Act 2014
- Counter-Terrorism and Security Act 2015
- And other legislation as appropriate

### 21.0 Associated policies and strategies

- [Accessible City Strategy 2023 to 2028](#)
- [Adult Learning Disability Strategy 2021-26](#)
- [Anti-Racism Strategy 2023 to 2028 \(brighton-hove.gov.uk\)](#)
- [ASB Policy](#)
- [Community Safety & Crime Reduction Strategy 2023-2026](#)
- Council Plan [A city where people feel safe and welcome \(brighton-hove.gov.uk\)](#)
- [Equality and Inclusion Policy Statement and Strategy](#)
- [PREVENT strategy](#)
- [Sussex Police Hate Crime Policy](#)
- [Sussex Safeguarding Adults Policy](#)

### 22.0 Sources of support



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- [A Seat At the Table](#) - is small local group for children of colour or dual heritage and their families who require someone to listen, support, advise and advocate where necessary.
- [Community Security Trust \(CST\)](#) – a charity protecting British Jews from antisemitism and related threats.
- [Crimestoppers](#) – a national charity with a free helpline for reporting crime anonymously.
- [Friends, Families & Travellers](#) - a national charity working on behalf of all Gypsies, Travellers and Roma regardless of ethnicity, culture or background.
- [Galop](#) – a national charity providing advice and support to members of the LGBTQ+ community.
- [LGBTQ+ Switchboard](#) – helpline offering emotional support and advice on reporting hate incidents.
- [Mind Out](#) – a mental health charity providing advice and support to members of the LGBTQ+ community, including advocacy, peer support and counselling.
- [Possability People](#) – a local charity offering free, independent information and support to everyone including disabled people, their carers, families and friends.
- [Saneline](#) – Out of hours mental health helpline offering emotional support and information.
- [SafeSpace website](#) – contains additional information about local support services.
- [Sussex Hate Incident Support Service](#) – a Sussex wide service which can help immediately after an incident or any time after the crime has taken place. They will listen to you in confidence and offer information, practical help and emotional support. You can self refer by calling 0808 1689274. If you need help outside of office hours, you can call the national support line free on 0808 1689111.

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- [Sussex Interpreting Services](#) - helps people with language needs to get full access to publicly funded services in order to improve health, education and quality of life.
- [Racial Harassment Forum](#) - Racial Harassment Forum advocates and supports people affected by racist and faith hate incidents to increase reporting in Brighton & Hove.
- [Speak Out Brighton & Hove](#) – a local charity supporting people with learning disabilities to have a voice, offering advocacy and drop in sessions.
- [Tell MAMA](#) – a national project supporting victims of anti-Muslim hate and monitoring anti-Muslim incidents.
- [The Clare Project](#) - provides a variety of support options for the trans, non-binary, and intersex (TNBI) community in Brighton and across Sussex.
- [True Vision](#) – a scheme owned by the National Police Chiefs' Council providing hate crime advice and online reporting, including advice on [internet hate crime](#).
- [Zolteria](#) – an app which allows anonymous reporting of hate incidents and links to support provided by Galop.

### Version Control

Version	Date	Author	Changes
1.0	16 August 2024	Helen Burrow	<a href="#">Draft policy</a> created for consultation signed off by HLT.
1.1	3 July 2025	Helen Burrow	<a href="#">Final draft policy</a> created to share with HLT with changes made following consultation – listed in <a href="#">separate doc</a> .
1.2	9 July 2025	Helen Burrow	Added “Housing” to policy title.  Para 4.4: replaced “hate” with “hostility or prejudice towards a personal characteristic or the perception of the person of having any of these characteristics” to provide a

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			<p>more detailed description in line with the Home Office definition of hate crime.</p> <p>Para 8.7: Added “removing graffiti from our properties &amp; estates”.</p> <p>Para 12.7: removed “work with Environmental Services to”</p> <p>Para 13.3: “All staff are trained on equality and diversity as part of their induction” changed to “All staff receive equality and diversity training”</p> <p>Paras 15.1 – 15.4: Changed wording from first to passive / third person. Replaced “complaint” with “concern” in paras 15.1-15.2 as recommended by Vic Paling, Customer Experience Lead.</p>
1.3	31 July 2025	Helen Burrow	<p>Added Para 1.1: Opening statement which acknowledges lived experience of those impacted by hate incidents.</p> <p>Para 2.1: Moved “(and anti-social behaviour)” after hate incidents</p>
1.5	05 Aug 2025	Justine Harris	<p>Added Para 1.2: outlining BHCC approach to dealing with reports of hate behaviour and further amendments to wording within Para 1.1.</p> <p>Added domestic abuse link to Para 4.5.</p> <p>Added link to Housing Performance webpage to Para 16.3.</p> <p>Removed domestic abuse policy from Associated policies &amp; strategies (policy to be drafted).</p>



# Housing Hate Incident Policy

## Consultation report

### July 2025

## Executive Summary

- We would like to take this opportunity to thank everyone who shared their feedback and experiences as part of this consultation. Your responses have been so valuable in shaping the final policy and our plans for implementation.
- New Consumer Standards from the Regulator of Social Housing were introduced in 2024. As part of the Neighbourhood and Community Standard, the Council is required to publish a Hate Incident Policy outlining its strategy for preventing and addressing hate incidents impacting tenants and leaseholders in their homes and neighbourhoods. This includes people who live in our Seaside Homes and Temporary accommodation homes.
- We consulted with residents on a draft policy for Housing and this report explains what we did and sets out the results of the consultation.
- An 11 week public consultation on the draft policy ran from 9 September to 2 December 2024 via the council's online engagement platform, *Your Voice*.
- Your Voice meets international accessibility standards and offers surveys in the ten most spoken languages in Brighton & Hove. An Easy Read version of the survey, created by local organisation Speak Out, was available online and in hard copy. Additional accessible formats, including large print and phone-based survey options, were offered. The consultation was promoted through multiple channels and supported by two in-person events in October 2024, enabling meaningful participation across the community.
- We received 57 responses to the main online consultation survey on the draft policy and 9 responses to an additional survey on experience of reporting a hate incident to Housing.
- 91.2% of responses were from individuals and 8.8% of responses were on behalf of a group or organisation.
- Most of the proposals within the draft Housing Hate Incident policy received agreement.

- Agreement with each of the proposals by respondents to the consultation ranged from 53.4% to 73.4%. However, just 31.6% of respondents agreed that the council is doing enough to promote awareness of action Housing can take in response to hate incidents and a sizeable minority (21.1%) felt that it wasn't clear on how to report hate incidents.
- Although a small sample size, 44.4% of respondents to the additional survey on experience of reporting a hate incident, felt they were supported very badly throughout their case, with 66.7% reporting that they weren't helped to access relevant support organisations, such as Victim Support. Respondents also reported issues with communication, staff training and lack of action.
- In response to the consultation feedback, we plan to take forward the following actions:

#### **Improving Victim Support**

- We have increased staffing within the Tenancy Team in 2025.
- Action Plans for all hate incident cases, with a named contact and agreed communication preferences.
- Victims asked directly what outcomes they want.
- Referrals offered (e.g. Victim Support), with clear communication through updated standard letters and staff training.
- New senior oversight role to monitor consistency, review case closure surveys and conduct annual reviews of case outcomes.

#### **System & Staff Development**

- Upgrades to the Housing IT system to support action plans and improved categorisation of hate incident cases, enabling better oversight.
- Refresher training for all customer facing Housing teams.

#### **Awareness & Accessibility**

- Promote via case studies, community groups, posters, and newsletter [Homing In.](#)
- Improve online reporting visibility and LGBTQ+ links.
- Partner with SpeakOut Brighton to ensure accessible content for those with learning disabilities.

#### **Accountability & Enforcement**

- Victims informed of possible Housing actions, including legal routes.
- Enhanced staff training on explaining processes and gathering evidence.

#### **Advocacy & Clear Communication**

- Policy now highlights right to an advocate or representative.
- Templates and documents reviewed for accessibility.

### **Additional Measures**

- Clearer definitions of hate incidents vs. hate crimes.
- Explore providing incident reference numbers.
- Anonymous reporting via online reporting form.
- Updated response time within policy: we will aim to contact victims within one working day, not two.

It is expected that the final policy will be implemented in Winter 2025/6 following sign off.

## **1. Introduction**

[New regulatory standards for social housing](#) were introduced in April 2024, which set out the specific standards that registered providers, including the Council, must meet. Under the [Neighbourhood & Community standard](#), the council is required to publish a Hate Incident Policy clearly setting out our approach to how we deter and tackle hate incidents affecting council tenant and leaseholders where they live. This includes people who live in our Seaside Homes and Temporary accommodation homes.

In September 2024, we consulted with residents and stakeholders on a draft hate incident policy for Housing. This report summarises findings from the public consultation on the draft policy, which can be viewed [here](#).

The consultation focused on capturing residents' views on key areas highlighted by the Social Housing Regulator's Consumer Standards Code of Practice including, supporting affected residents, reporting, keeping residents informed and taking appropriate action.

The consultation ran for 11 weeks from 9 September to 2 December 2024. When the consultation closed, we had received 57 responses. 91.2% were from individuals, including 56.1% in council housing (including leasehold), 22.8% in private and owner occupied and 5.3% in temporary accommodation (including Seaside Homes)<sup>1</sup>. 8.8% responses were received on behalf of groups, networks and organisations, which included Sussex Police (Appendix E). Most responses were submitted online through Your Voice, the council's consultation platform and 2 responses received via in person sessions.

9 respondents opted to give further feedback on their experience of reporting a hate incident to Housing (2 via phone calls and 7 via an online survey).

Alongside indicating support for proposals within the draft policy, respondents gave feedback on Housing's response to persons harmed by hate incidents and ways

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<sup>1</sup> 15.8% of respondents chose not to answer tenure question

Housing can improve the policy and our response. We received many detailed responses, which have been summarised within section 3<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.

Section 4 sets out the council's response to the feedback themes and identifies how we plan to take forward key issues. We are not able to respond to every point made within this report, but the responses received have been used to inform the final policy and shared with relevant council officers to improve our service.

Section 5 outlines the consultation process whilst section 6 details the next steps.

## **2. The consultation process.**

### **Developing the draft policy for consultation.**

The work to develop the draft policy was overseen by the Performance & Improvement Team led by the Head of Tenancy Services. Managers within Tenancy Services, Temporary Accommodation, the Community Safety Team and the ASB Officer for Temporary Accommodation were consulted and contributed to the draft policy.

Local organisations and stakeholders (listed in Appendix F) were invited to give initial feedback on Housing's response to hate incidents. Initial feedback from Victim Support and the Housing Strategy consultation, along with analysis of stage one complaints<sup>3</sup> (Appendix A) and Housing Ombudsman complaints were taken into consideration, along with advice from HQN (Housing Quality Network) who provided a copy of Notting Hill Genesis's policy as an exemplar example. Good practice and current legislative and regulatory requirements were also considered.

The Joint Housing Leadership Team reviewed the draft policy and agreed the consultation plans in August 2024, which was followed by a briefing to the Lead member for Housing.

In addition to supporting compliance with the consumer standards introduced by the Regulator of Social Housing, the draft policy aligns with the council's Anti-Racism Strategy and Equality Act 2010 obligations. The draft policy also aligns with the aims within the [Housing Strategy 2024 – 2029](#) to “*work with residents and our partners to develop safe, healthy and inclusive estates and neighbourhoods (4.1)*” and outcome 2 of the [Council Plan 2023 – 2027](#), to create a fair and inclusive city.

The draft hate incident policy builds upon the current service offer under the Tenancy Management [Anti-Social behaviour policy](#) with key additions to the following

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<sup>2</sup> Thematic analysis was undertaken with the support of the Your Voice artificial intelligence (AI) feature and moderated by members of the project group.

<sup>3</sup> A Stage 1 complaint is the first stage of the complaint procedure and aims for the relevant service team to; fully resolve the complaint and identify learning which will drive service improvement

areas: Scope, Additional measures to support victims, Senior oversight, Performance reporting, Staff training and awareness.

## **Formal consultation.**

The consultation on the draft policy was launched on 9 September 2024. This was done using our online consultation portal 'Your Voice' (with the option to provide responses via phone), we reached out to community groups and promoted the consultation on social media, displaying posters on our housing estates, in libraries, Bartholomew House and Hove Town Hall.

The project officer met weekly with a Community Engagement Officer to review progress and consider potential changes to the consultation approach. Based on feedback from Area Panel, two in person sessions were facilitated by the Community Engagement Team in October. The consultation was extended for a further three weeks (and closed on 2 December 2024) allowing for further communication to increase the response rate. This included targeted promotion of the lived experience survey amongst a sample of residents with a recently closed hate incident case.

## **Promoting the consultation.**

Allowing for duplication between the different mailing lists, over 100 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 reminders in October and November 2024.

An invitation to take part was sent to:

- 77 individuals and organisations on a core stakeholder list
- 49 individuals, groups and organisations on mailing lists held by the council's Community Engagement Team
- Link added to the Housing Online account homepage and an email with link sent to 4434 tenants without Housing Online account
- Text & emails to 1196 Temporary Accommodation & Seaside Homes residents
- Text to 485 Seaside Homes residents (sent by Seaside Homes Tenant Engagement Lead)
- Link to 'Tell us about your experience of reporting a hate incident to Housing' survey emailed and texted to a sample of 10 tenants who previously reported a hate incident

Other publicity:

- Emails to all Housing staff
- Article in the Autumn edition of Homing In magazine delivered to council tenants and leaseholders
- 100 posters were distributed for display on residents' noticeboards and Bartholomew House

- Social media on the Housing, Libraries and Community Engagement accounts
- Plasma screens in libraries and Hove Town Hall
- Area Panel meetings
- Annual Tenant conference
- Resident associations (via the Community Engagement Team)
- [Seaside Homes blog post](#)

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

Large print, hard copy surveys were available on request by email or phone. An Easy Read survey 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.

The option to complete the survey by phone was publicised via the Community Engagement Team, Homing In, Area panel meetings and targeted engagement to tenants. Two in person sessions were also held at Bartholomew House.

## 3. Consultation results

Overall, there was broad support for the draft policy, however a significant number of responses received highlighted areas of the policy respondents felt could be improved. These areas mainly concerned existing practices, such as the council's current webpages on reporting, and the current response of Housing to reports of hate incidents.

Respondents highlighted the need to ensure reporting a hate incident to Housing is clear and accessible, alongside improved information to ensure residents understand what a hate incident is. Responses also called for regular updates and communication with victims, tailored to their individual needs and preferences, in addition to referrals to support services including advocacy.

Several respondents emphasized the importance of taking action against perpetrators and ensuring that hate incidents have consequences. A significant proportion of respondents felt that the council is not doing enough to promote awareness of actions taken in response to hate incidents.

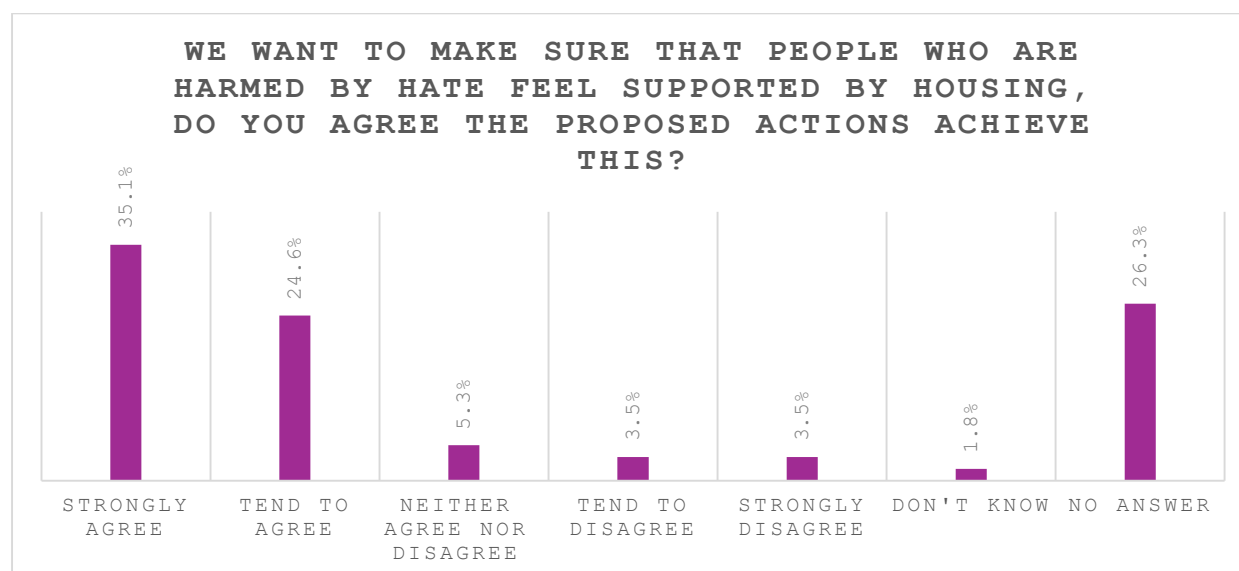
Several responses called for staff to receive training in dealing with hate incidents and to ensure staff are impartial, open minded and empathetic when dealing with cases.

Whilst some respondents had a satisfactory experience, a significant number of responses to the lived experience survey highlighted dissatisfaction with the current response to reported hate incidents and suggested ways for Housing to improve the handling of these cases. Respondents raised issues with staff training, communication, lack of action and indicated that many victims did not feel supported.<sup>4</sup>

A summary of the responses to each individual question within the main and lived experience surveys are set out in following sections 3.1 – 3.8, in addition to a summary of the in-person sessions (section 3.7). The full survey questions are included as appendices (Appendix B & C).

## 3.1 Supporting victims

We asked for views on 11 proposed supportive actions including meeting with the person harmed by hate within two working days of the first report at a location of their choice, arranging for a named officer to be a point of contact and arranging for repairs resulting from a hate incident to be completed as a priority.



### Support for proposals

Amongst those who responded to this question (42/57) there were high levels of support for the proposed actions (59.7% agree or strongly agree; 7.0% disagree or strongly disagree). However, a sizeable minority (28.1%) did not answer the question or said they didn't know.

### Suggestions on how Housing can improve

Just over half of the respondents (35/57) gave further feedback on how Housing can ensure people harmed by hate feel supported.

<sup>4</sup> Due to the small sample size, these results may not accurately reflect the experience of the majority of residents reporting hate incidents to Housing. However, the responses provide a valuable insight into the response by Housing.

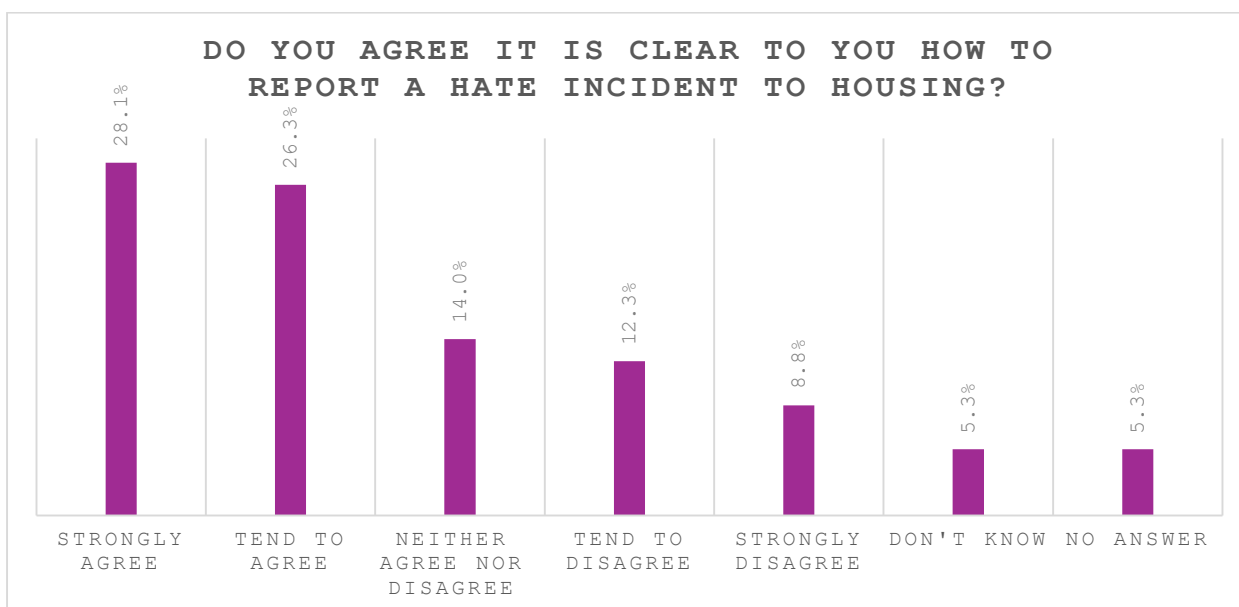
Question	Feedback
<p><b><i>Is there anything else you think we should offer to make sure people harmed by hate feel supported or do you have any further comments on supporting people harmed by hate?</i></b></p>	<ul style="list-style-type: none"> <li>• Victim centred approach adapted to the needs of the individual</li> <li>• Whilst the council may not always be able to deliver the victim's desired outcome, their voice should remain the centre of the process</li> <li>• Ongoing support and regular contact, with clear communication on the actions taken by Housing</li> <li>• Providing a named contact to help alleviate isolation often experienced by victims of hate</li> <li>• Consideration of an advocate</li> <li>• Referrals to appropriate support groups and where necessary, safeguarding referrals with the consent of the victim</li> <li>• Practical support, such as repairing damage like broken windows and providing free security cameras</li> <li>• Option of rehousing in severe cases</li> <li>• Listen to victim's communication preferences and offer alternatives to face to face meetings. An initial face to face meeting within 2 days of first report may feel like an interrogation</li> <li>• Asking the victim their views and explicitly what they want to happen</li> <li>• Ensuring staff are properly trained and officers are sensitive to the issues faced by victims of hate incidents</li> <li>• Staff to be aware that hate incidents can occur within minority groups and not to make assumptions about who might be a perpetrator or victim based on their group membership</li> <li>• Involving the police, either to ensure the victim reports the incident or to engage with the perpetrator and to</li> </ul>



	consider the option of restorative justice <ul style="list-style-type: none"> <li>• Ensuring staff are non-bias</li> <li>• Evict or move perpetrators and strict enforcement of rules</li> </ul>
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## 3.2 Reporting hate incidents to Housing

Respondents were invited to view relevant pages of the council website via a link to the draft policy [www.brighton-hove.gov.uk/housing/council-housing/tenancy-management-draft-hate-incident-policy](http://www.brighton-hove.gov.uk/housing/council-housing/tenancy-management-draft-hate-incident-policy) and feedback on how clear the information was.



### Support for proposals

Whilst most respondents (53.4%) agreed that it is clear to them how to report a hate incident to Housing, a sizeable minority (21.1%) disagreed.

### Suggestions on how Housing can improve

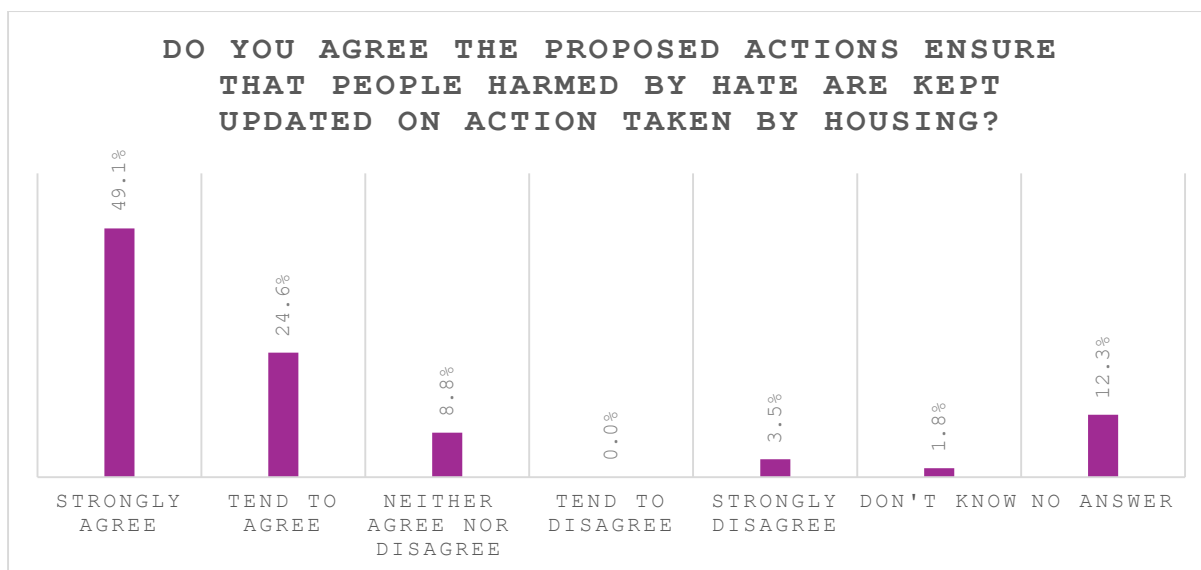
54/57 respondents answered this question and 29/57 gave suggestions on how Housing can make reporting hate incidents easier.

Question	Feedback
<i>Is there anything we can do to make reporting hate incidents to Housing easier?</i>	<ul style="list-style-type: none"> <li>• Improve awareness of what constitutes a hate incident &amp; hate crime, and how to report</li> <li>• Clearer definitions within policy, particularly the differences between a hate incident and hate crime</li> </ul>

	<ul style="list-style-type: none"> <li>• Dedicated and easily accessible reporting channel</li> <li>• A separate email address or freephone number specifically for hate incidents reports</li> <li>• Speaking to the same person about ongoing reports to ensure that important information is acted on</li> <li>• Accommodations for individuals with disabilities and where English is not spoken as a first language</li> <li>• Improvements to the council's webpages, including creating a clear support link on the homepage for LGBTQ+ individuals to report hate crimes and ensuring all links are functional</li> <li>• Written acknowledgement that incident has been logged</li> <li>• Housing to clearly communicate a zero-tolerance stance on hate incidents and to carry out regular visits to areas with reoccurring issues</li> </ul>
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### 3.3 Keeping residents informed

We asked for feedback on proposals to ensure that people who have been harmed by hate are kept informed by the case officer using their preferred contact method and agreed frequency of contact until the case is closed. By maintaining regular contact, it is proposed that the harmed person will be clear on what action will be taken and how long we think this will take.



## Support for proposals

Amongst those who responded to this question (50/57), the majority agreed the proposed actions would ensure that people harmed by hate are kept updated on actions taken by Housing (73.7% agree or strongly agree; 3.5% strongly disagree).

## Suggestions on how Housing can improve

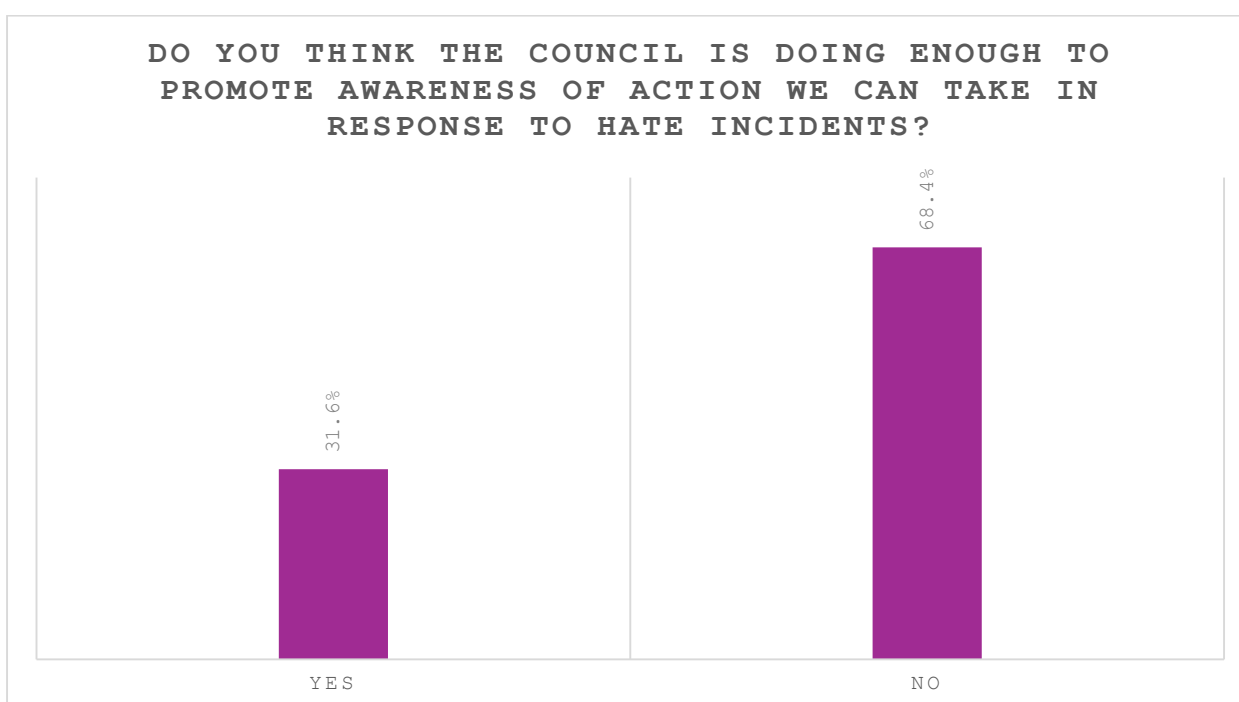
26/57 respondents gave further feedback on how we can improve communication with people harmed by hate on actions taken by Housing.

Question	Feedback
<i><b>Can you tell us more about how we can make sure that people harmed by hate are kept updated on actions taken by Housing?</b></i>	<ul style="list-style-type: none"> <li>• Regular and direct communication between Housing and those affected by hate incidents via text, phone calls and visits</li> <li>• Provide direct contact details of Housing Officers</li> <li>• Agreeing a victim contract on frequency and method of contact to set expectations</li> <li>• Tailor communication to individual's needs</li> <li>• Offer option of keeping a nominated representative, such as next of kin or support worker informed</li> <li>• Ensure Housing has sufficient resources to manage casework effectively</li> </ul>

	<ul style="list-style-type: none"> <li>• Ensure staff follow policies and act professionally</li> <li>• Timely action following reported incidents</li> </ul>
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### 3.4 Taking appropriate action.

Respondents were invited to give feedback on whether Housing is doing enough to promote awareness of action we take in response to hate incidents. A link to the draft hate incident policy was included, but it was made clear it was not necessary to read in order to answer the question [Tenancy management - draft hate incident policy](#).



### Support for proposals.

When asked whether they think the council is doing enough to promote awareness of action we can take in response to hate incidents, around two thirds of respondents answered 'No' (68.4%) rather than 'Yes' (31.6%). This question was answered by all 57 respondents, 24 of which gave further feedback on ways to improve awareness.

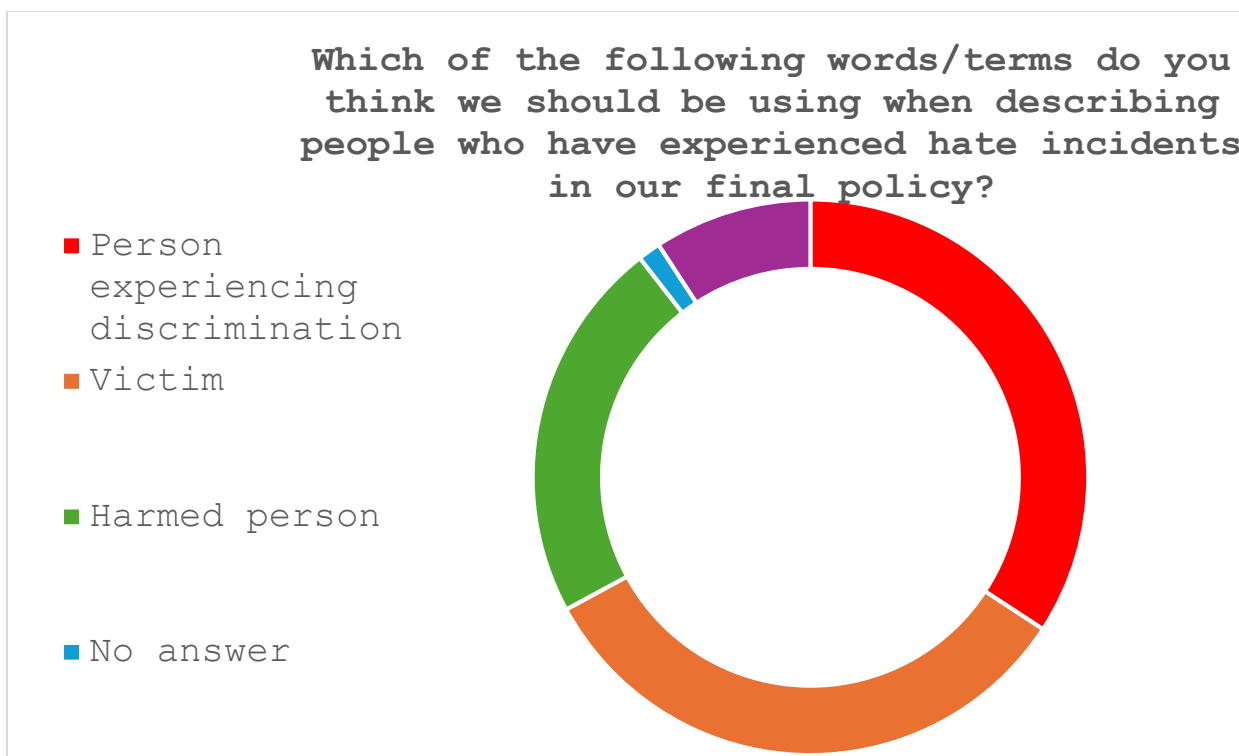
### Suggestions on how Housing can improve

Question	Feedback
<i>Can you tell us more about how we can improve promoting awareness of what action we can</i>	<ul style="list-style-type: none"> <li>• Publicising actions taken against perpetrators to increase confidence amongst victims of hate incidents to report to Housing</li> </ul>

<p><i>take in response to hate incidents?</i></p>	<ul style="list-style-type: none"> <li>• Raise awareness via Homeing In publication, notices on buses and notice boards, talks in schools and community gatherings, letters to all tenants and via the Community Engagement Team</li> <li>• Clear and tangible consequences for perpetrators, including eviction</li> <li>• Remind all tenants of terms of tenancy agreement</li> <li>• Ensure information is accessible, provided in a variety of formats and languages</li> <li>• Use an independent organisation or person to check that documents and policies are accessible for residents with learning disabilities</li> <li>• Better training for staff</li> <li>• Expand the definition of hate beyond protected characteristics</li> <li>• More proactive, transparent and consistent actions by Housing to address hate incidents</li> <li>• Better communication to ensure residents are aware of both the issues and the actions being taken</li> </ul>
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### 3.5 Policy wording.

Respondents were also asked which words/terms they thought we should be using when describing people who have experienced hate incidents in our final policy. They could choose more than one preference from a list of words/terms. The most chosen was 'Person experiencing discrimination', chosen by 34.2% of respondents, followed by 'Victim' (32.9%) and 'Harmed Person' (22.4%) and 9.2% selected that they would like to use another unspecified word/term.



One respondent added that using the word victim may put people off reporting as it is seen as “weak” and disempowering.

### 3.6 Anything else.

Almost half of respondents (27/57) gave further feedback when asked whether there is anything else we should consider when writing the final policy.

Question	Feedback
<i>Is there anything else we should consider when we write the final policy?</i>	<ul style="list-style-type: none"> <li>• Offer other remedies in cases where the perpetrator can’t be identified, to ensure that people feel that they are believed and supported.</li> <li>• Several respondents called for stronger action against perpetrators, with eviction as a potential consequence for repeat offenders.</li> <li>• Several responses called for clear support mechanisms, including protection for anonymous witnesses and reassurances about what will happen following a report and any safeguards in place to keep them safe from further incidents.</li> <li>• Several respondents called for the definition to be widened, for</li> </ul>

	<p>example including age and domestic abuse.</p> <ul style="list-style-type: none"> <li>• Several respondents expressed concerns whether the policy would be followed by officers and highlighted the need to ensure officers are properly trained to respond to hate incidents.</li> <li>• Several respondents suggested learning best practice from other organisations, particularly those who support groups who are more likely to experience discrimination.</li> <li>• Several respondents highlighted the importance of referring people facing discrimination to relevant support.</li> <li>• Information on crime within the area to be made available to Homemove applicants bidding on properties.</li> </ul>
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### 3.7 In person sessions

Two in person sessions were held at Brighton Town Hall on 29 October 2024. Although eight residents registered to attend, just two attended.

Key points captured during these sessions include tailoring communication methods, promoting awareness of how to report hate incidents, taking a victim centred approach, ensuring that harmed person's needs remain in focus when working with perpetrator's with vulnerabilities and consideration as to whether tenants can be informed when individuals with known ASB histories are moved into their community.

### 3.8 Lived experience.

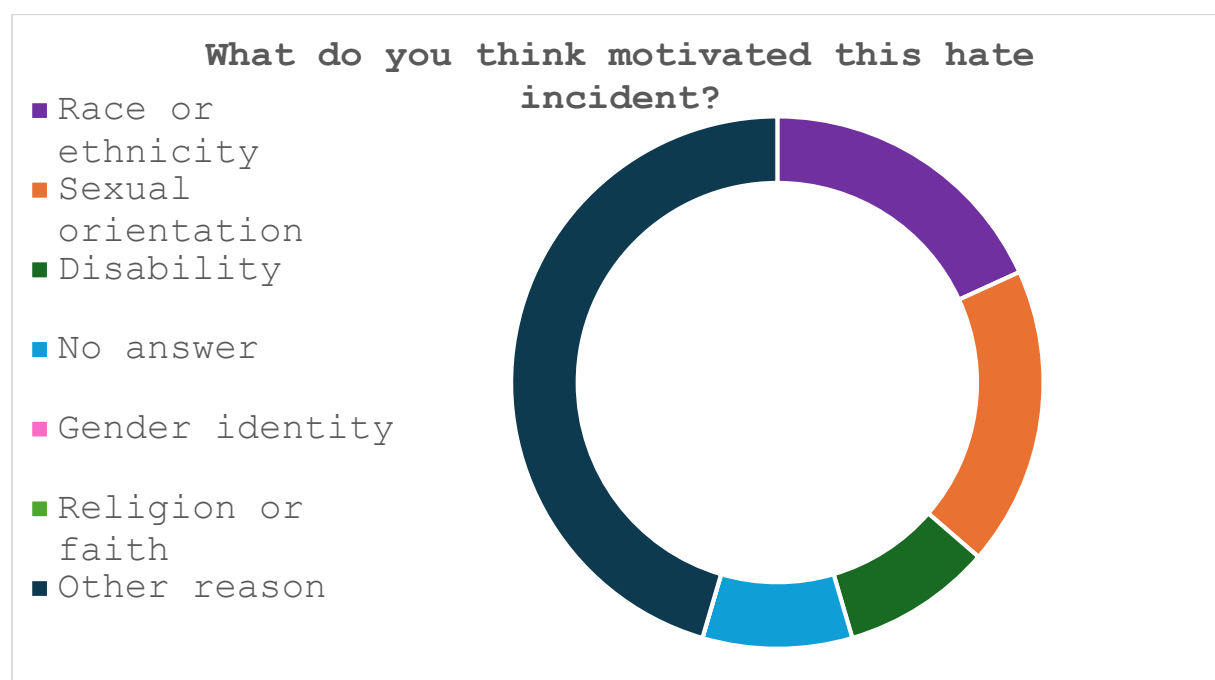
A significant number of respondents (20/57) answered that they would like to give feedback on their response of reporting a hate incident to Housing. However, 64.9% of these respondents did not select an option to provide feedback and we were therefore unable to contact them.

A sample of 11 tenants who had previously reported a hate incident in the last 18 months were also contacted to complete the survey.

A total of 9 respondents gave feedback on their experience of reporting a hate incident to Housing (2 via phone calls and 7 via an online survey). Although a small number of respondents completed the survey, their responses provide valuable feedback on Housing's response to hate incidents.

Whilst some respondents had a satisfactory experience, a significant number of respondents expressed dissatisfaction, citing lack of support, poor communication and inadequate response to complaints. Overall, respondents expressed a need for more empathetic responses from staff, better adherence to policies and improved support and communication for victims.

When asked what they thought motivated the hate incident, the most chosen option was 'other reason' (45.5%) followed by 'race or ethnicity' and 'sexual orientation; (18.2% each) and 'disability' (9.1%). None chose the options 'gender identity' and 'religion or faith' and 9.1% chose not to answer.

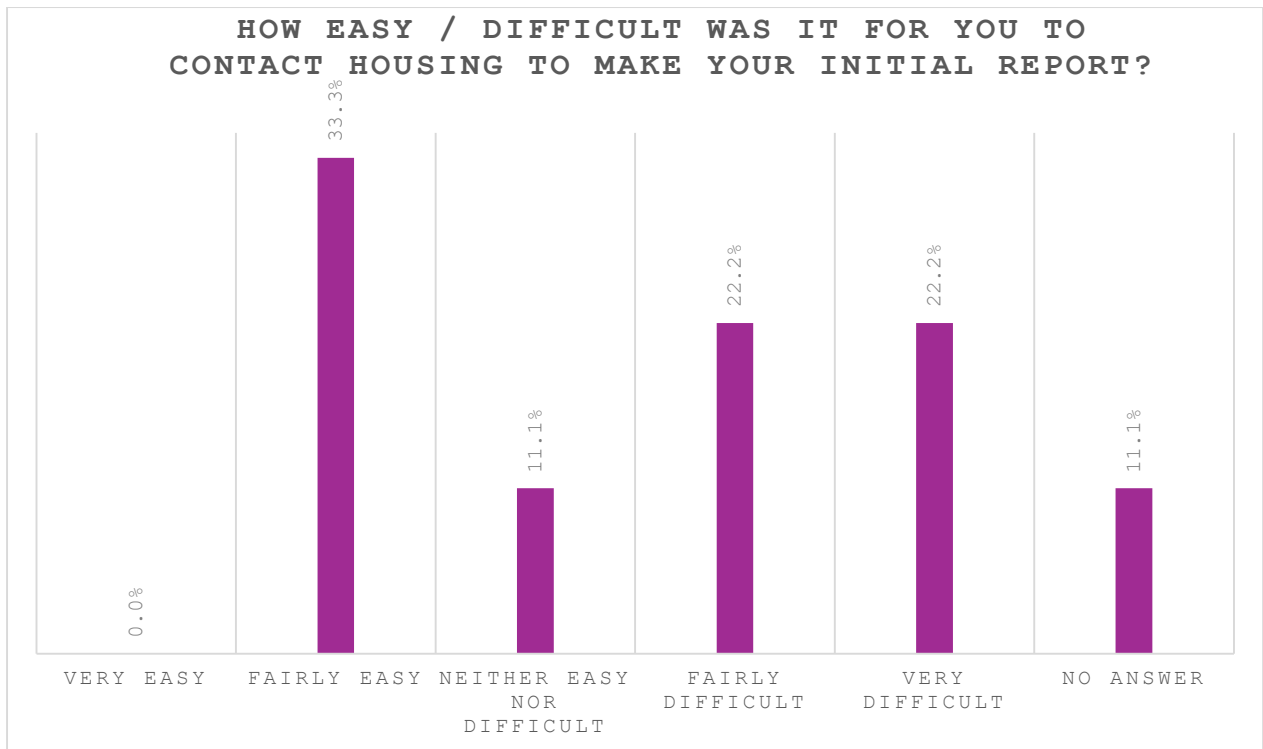


## Reporting hate incidents to Housing.

### *How easy / difficult was it for you to contact Housing to make your initial report?*

When asked how easy or difficult it was for them to contact Housing to make their initial report, 44.4% said it was either 'very difficult' or 'fairly difficult' (22.2% each), a third of respondents (33.3%) said it was 'fairly easy' and none that it was 'very easy.' However, a sizeable minority (22.2%) did not answer the question or said they didn't know.





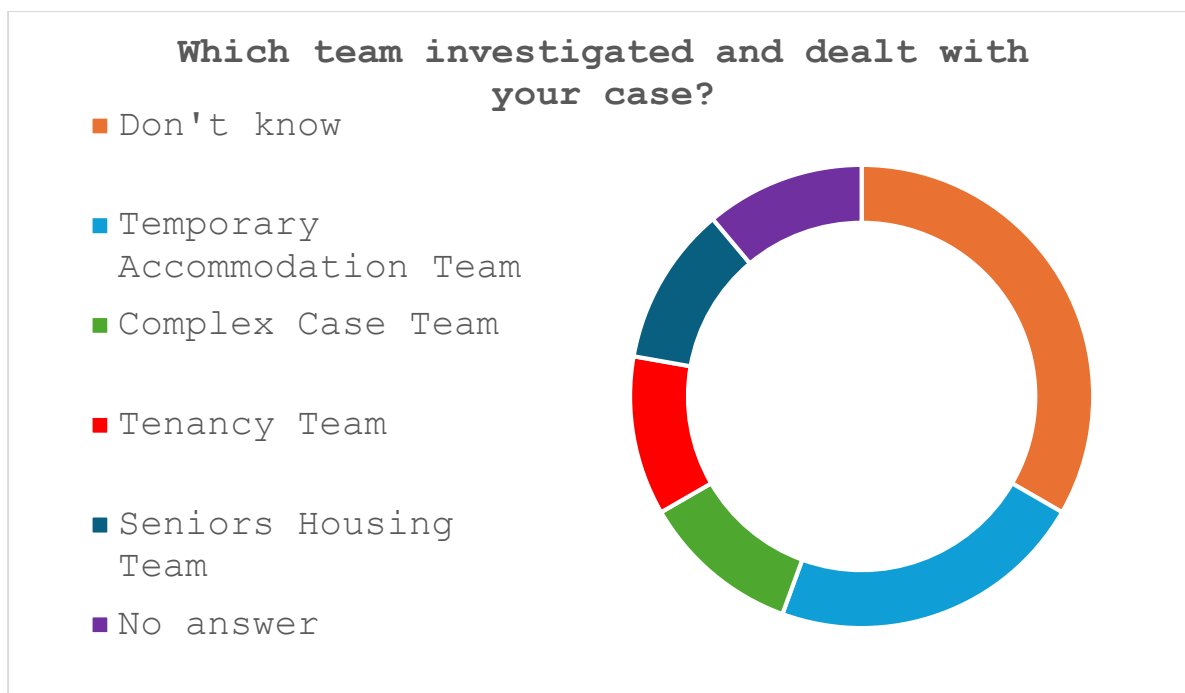
## Suggestions on how Housing can improve

6/11 of respondents suggested improvements to make the reporting of hate incidents to Housing easier.

Question	Feedback
<i><b>Is there anything we could have done to make reporting easier?</b></i>	<ul style="list-style-type: none"> <li>• Reasonable changes to accommodate people with disabilities, including learning disabilities</li> <li>• Direct line to staff experienced in handling hate incidents</li> <li>• Staff taking phone calls to be polite and friendly</li> <li>• Sending letters to all residents in a building</li> </ul>

## ***Which team investigated and dealt with your case?***

Respondents were also asked which Housing team investigated and dealt with their case: 44.4% said they didn't know (33.3%) or gave no answer (11.1%) leaving 55.6% who specified a team: 22.2% answered 'Temporary Accommodation Team' followed by 11.1% each for the 'Complex Case Team', 'Tenancy Team' and the 'Seniors Housing Team.'



## Being treated fairly & with respect.

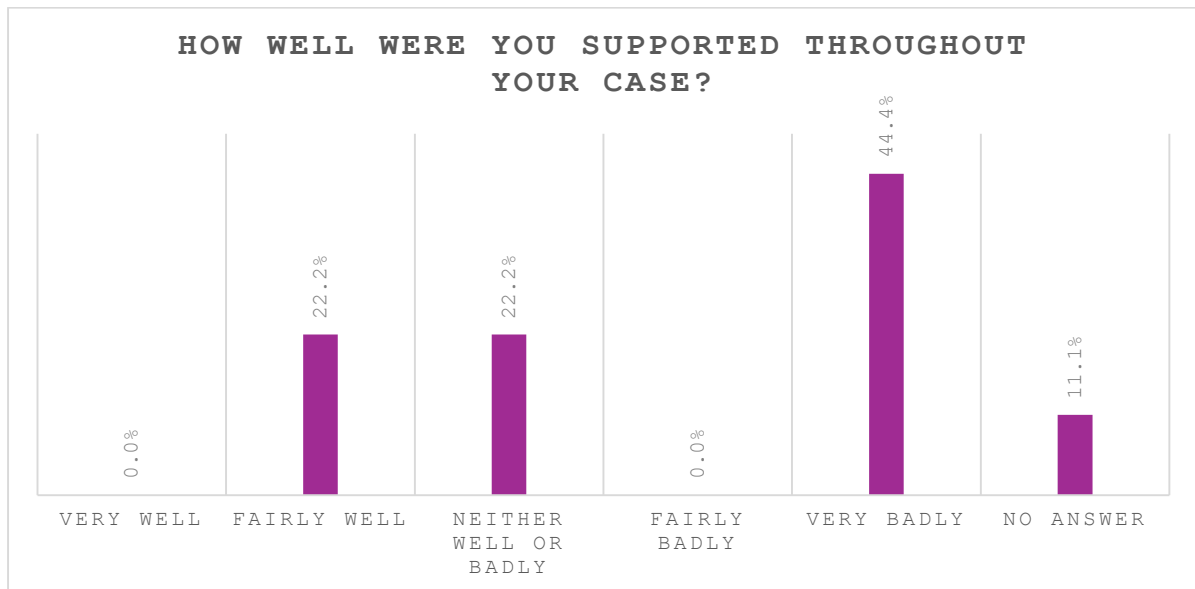
7 respondents gave their feedback and overall reported mixed experiences with council housing when reporting hate incidents. Whilst 2 respondents felt they were treated with respect and fairly, others had negative experiences, including feeling discriminated against by council officers or feeling let down by the service, with no follow-up after reporting serious incidents.

Question	Feedback
<b><i>We value your input on our services. In your experience, how well did the council handle your report of a hate incident? Did you feel you were treated fairly and with respect throughout the process?</i></b>	<ul style="list-style-type: none"> <li>One respondent who had made more than one report, had a positive experience, however, later felt discriminated against by staff when making a subsequent report.</li> <li>One respondent felt the council ignored bullying and intimidation by tenants and shared confidential information.</li> <li>"No I did not feel that way. I was sent around to various people. There wasn't a clear method, contact or process to report hate incident nor what would happen after"</li> </ul>

## Supporting victims.

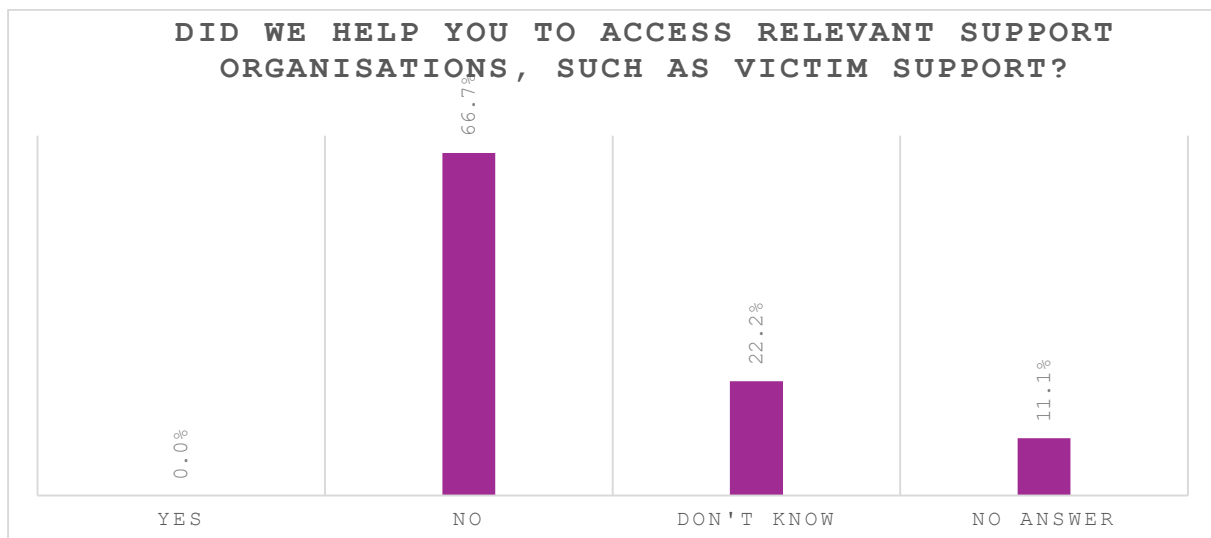
### ***How well were you supported throughout your case?***

When respondents were asked how well they were supported throughout their case, 44.4% said 'very badly', 22.2% said 'fairly well' and 22.2% said 'neither well or badly.' None answered 'very well' or 'fairly badly' and 11.1% gave no answer.



### ***Did we help you to access relevant support organisations, such as Victim Support?***

Two thirds of respondents said 'no' when asked if they were helped to access relevant support organisations, such as Victim Support. None answered 'Yes' and the remainder said they didn't know (22.2%) or gave no answer (11.1%).



### **Suggestions on how Housing can improve**

Whilst 2 respondents stated that there was nothing more that Housing could have done to make them feel more supported, 5 respondents gave suggested improvements for how Housing can support residents who have experienced hate incidents. A common issue was the lack of updates provided by Housing, in addition to a lack of explanation regarding the actions taken.

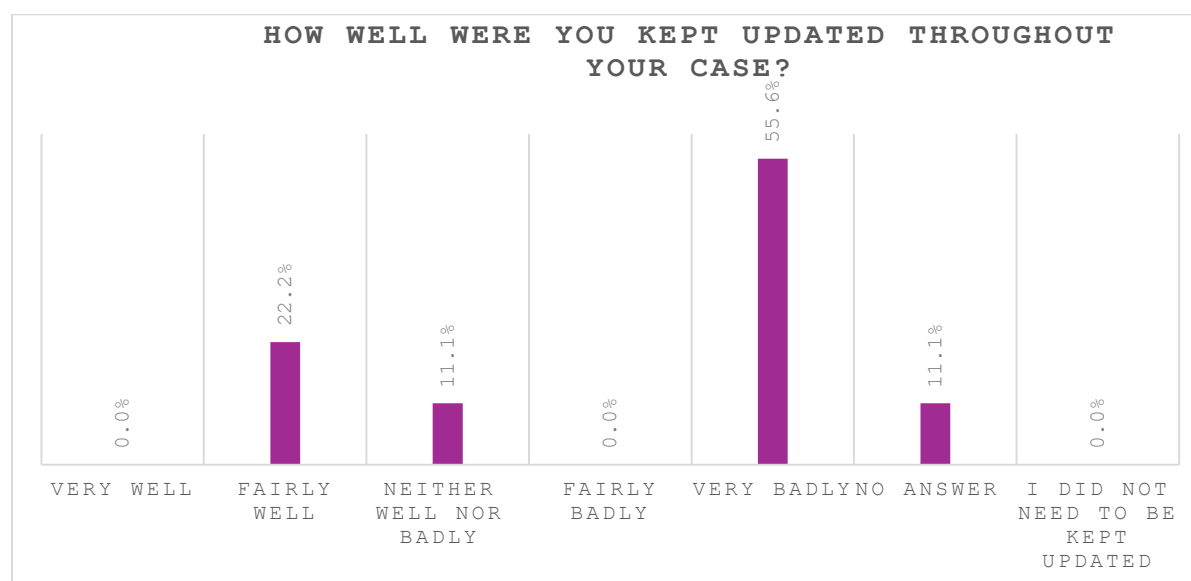
Access to relevant support organisations such as Victim Support was generally not provided, which contributed to feelings of being unsupported.

Question	Feedback
<b><i>Is there anything we could have done to make you feel more supported?</i></b>	<ul style="list-style-type: none"> <li>• Staff to follow council policy for anti-social behaviour (ASB)</li> <li>• Carry out risk assessments</li> <li>• Return calls and emails</li> <li>• Clearer communication and listening to victims</li> </ul>

## Keeping residents informed.

### ***How well were you kept updated throughout your case?***

When asked how well they were kept updated throughout their case, a majority of respondents (55.6%) said 'very badly', 22.2% said 'fairly well' and 22.2% said 'neither well or badly.' None said 'very well' or 'fairly badly' and 11.1% gave no answer.



## Suggestions on how Housing can improve

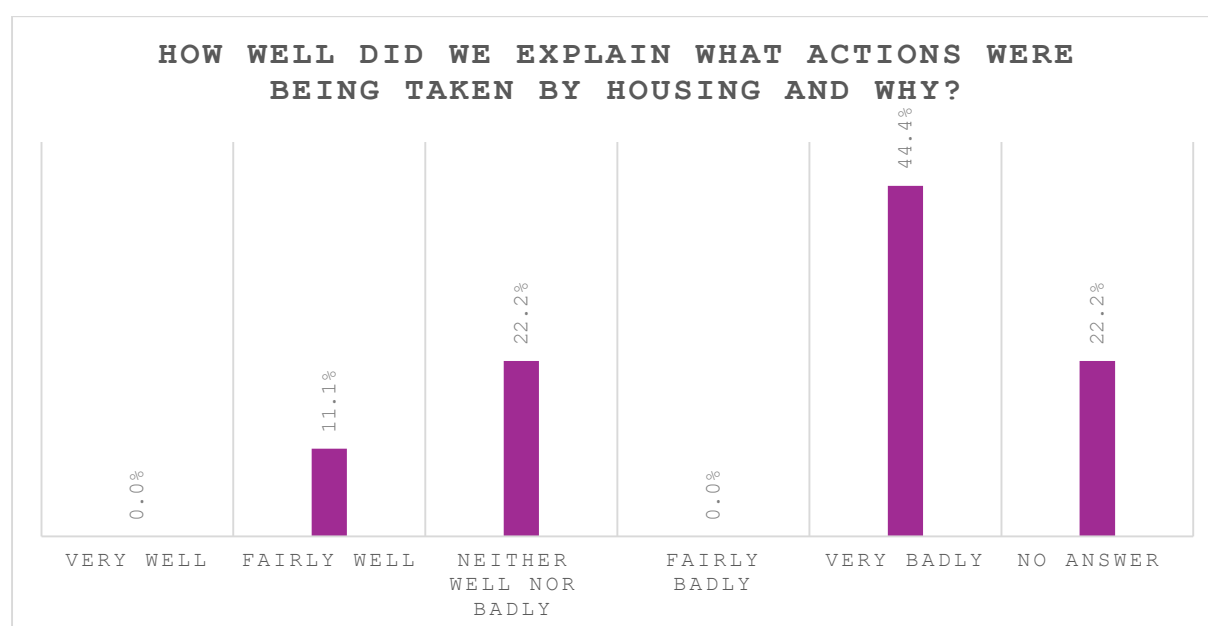
Whilst 1 respondent answered that there was nothing Housing could have done better, 6 respondents gave suggested improvements for Housing to keep residents updated on their case.

Question	Feedback
<i><b>Is there anything we could have done better to keep you updated?</b></i>	<ul style="list-style-type: none"> <li>• Staff to ensure victims are aware of any visits to the perpetrator</li> <li>• Maintain agreed contact arrangements</li> <li>• Provide a named point of contact in Housing</li> <li>• Provide updates on request</li> </ul>

## Taking appropriate action.

### ***How well did we explain what actions were being taken by Housing and why?***

Similarly, respondents were asked how well Housing explained what actions were being taken and why, with the same set of response options: 44.4% answered 'very badly' followed by 22.2% 'neither well nor badly' and 11.1% 'fairly well.' None said 'very well' or 'fairly badly' and 22.2% gave no answer.

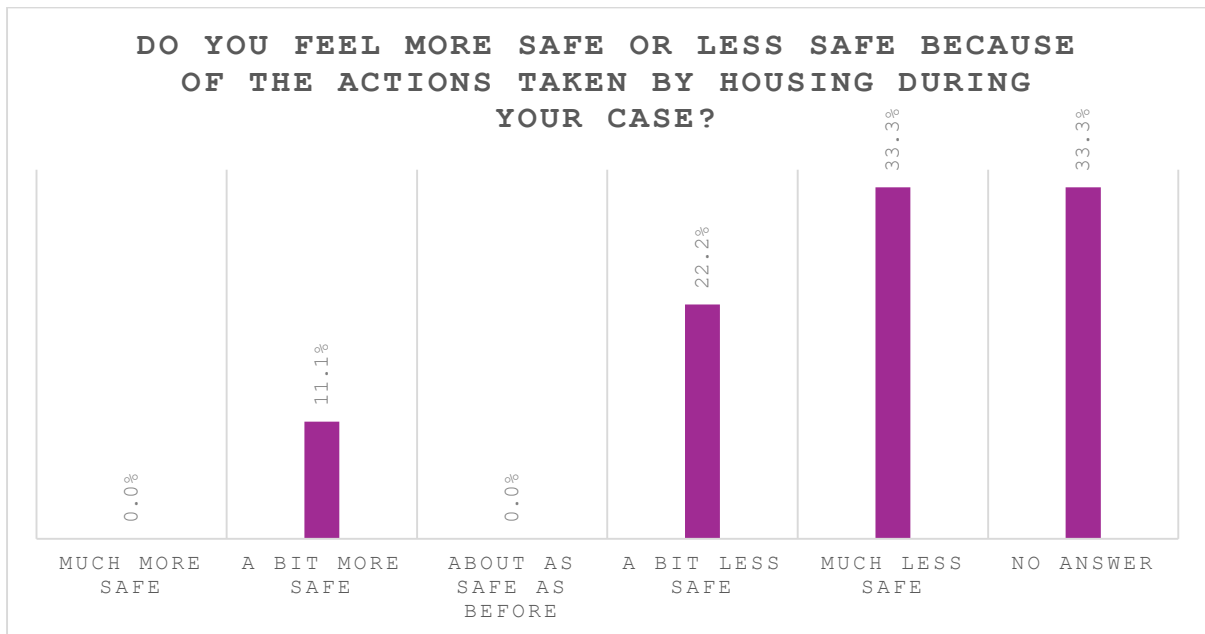


## Suggestions on how Housing can improve

Whilst 1 respondent stated that there was nothing more that Housing could have done to better explain actions taken and 1 respondent stated that no action was taken, 3 respondents gave further feedback on ways Housing can better explain any action taken.

Question	Feedback
<i>Is there anything we could have done to better explain what action we were taking and why?</i>	<ul style="list-style-type: none"> <li>Proactive communication and not waiting for victim to chase for updates</li> <li>"Provide a timeframe of how long things would take...respond to the ...within a reasonable timeframe preferably 1-3 days"</li> <li>Ensure additional follow up contact is made with victim following reports of serious incident</li> </ul>

Respondents were then asked whether they feel more safe or less safe because of the actions taken by Housing during their case. Most respondents (55.5%) answered either 'much less safe' or 'a bit less safe' (33.3% and 22.2% respectively) and 11.1% answered 'a bit more safe.' None answered 'much more safe' or 'about as safe as before' and 33.3% gave no answer.



### Suggestions on how Housing can improve

6 respondents gave further feedback on how Housing could have made their overall experience better.

Question	Feedback
	<ul style="list-style-type: none"> <li>Provide a professional and caring response</li> </ul>

<b><i>Is there anything we could have done to make your overall experience better?</i></b>	<ul style="list-style-type: none"> <li>• Respond within a reasonable timeframe</li> <li>• Take action</li> <li>• ASB officers to carry out visits to witness problems</li> <li>• Offer in person ASB surgeries</li> <li>• Dedicated community support officer available for residents to speak to in person</li> </ul>
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## 4. Consultation outcome.

A workshop was held with service managers in February 2025 to review and discuss how to implement key consultation feedback in the final policy. Managers were asked to consider how ensure the policy meets the following objectives:

1. Ensuring persons impacted by hate feel supported and treated fairly & with respect
2. Ensure that persons harmed by hate are kept updated and understand any actions taken by Housing
3. Persons impacted by hate incidents understand the definition of hate incidents or crimes & know how to report them in a safe way

The tables below set out how we plan to take forward these key issues and how we have considered the suggestions of residents. We are not able to respond to every point made within this report, but the responses received have been used to inform the final policy and shared with relevant council officers to improve our service.

Key findings from consultation	Our response
<b>44.4% of respondents to lived experience survey felt they were supported very badly throughout their case.</b>	<p>We'll be introducing an individual action plan to all hate incident cases, regardless of level of risk. These will be overseen by our Complex Case and Temporary Accommodation Managers.</p> <p>Our Senior Oversight role will ensure that:</p> <ul style="list-style-type: none"> <li>• A single point of contact is provided</li> <li>• Full range of communication methods, including WhatsApp, are offered</li> </ul>

	<ul style="list-style-type: none"> <li>• Communication preferences are recorded, including method &amp; frequency as agreed with the victim</li> <li>• The victim has been asked what they would like to happen</li> <li>• Support referrals (including Victim Support) are offered</li> <li>• Standard letters (or alternatives) are used to ensure any actions are fully understood</li> <li>• Victims are offered the opportunity to feedback on their experience via case closure surveys</li> <li>• Staff receive refresher training on victim &amp; witness service standard</li> <li>• Consistent actions are taken across Housing to address hate incidents</li> </ul> <p>We are updating our current Housing Management IT system to support the action plan process and improved categorisation of hate incident cases, enabling better oversight.</p> <p>We have increased our capacity within the tenancy team to deal with anti-social behaviour across the city. The increase resource looks to provide more focus on supporting victims and an increased ability to manage the demand and provide good outcomes and resolutions.</p>
<p><b>Two thirds of respondents felt that the council isn't doing enough to promote awareness of actions that can be taken in response to hate incidents.</b></p>	<p>We'll look to publish case studies around hate incident case outcomes and the difference this has made to our residents.</p> <p>We will ensure staff are trained so that they are confident in explaining the actions available to Housing and are clear on information sharing.</p> <p>We will review our standard letters to ensure they are clear, including the letter sent on the opening of cases explaining potential actions by Housing.</p>



	We will ensure that advocacy is built into the procedure and offer the option of keeping a nominated representative informed.
<b>A sizeable minority (21.1%) felt it is not clear how to report a hate incident to Housing.</b>	<p>We'll review the information on the Brighton &amp; Hove City Council website and look to do further promotion, including an article in Homing In, posters and promoting awareness via community groups.</p> <p>We will work with Brighton Speak Out to ensure that information is accessible to residents with learning disabilities.</p>

<b>Customer recommendations</b>	<b>Our response</b>
<b>Clearer definitions within policy, particularly the differences between a hate incident and hate crime</b>	We have updated the definition within the policy and will ensure that the information on our website is reviewed.
<b>Written acknowledgement that incident has been logged</b>	We are looking into whether a reference number can be given to residents when they report an incident and we are reviewing our standard letters sent out once a case is opened.
<b>Improvements to the council's webpages, including creating a clear support link on the homepage for LGBTQ+ individuals to report hate crimes and ensuring all links are functional</b>	We'll review and update the information on the Brighton & Hove City Council website.
<b>Consideration of an advocate</b>	<p>We have added extra detail to the policy to ensure that residents are aware they can use advocacy and request that a nominated representative, such as next of kin or support worker is kept informed.</p> <p>We will ensure that the supporting procedure prompts staff to signpost to advocacy where needed.</p>
<b>Agreeing a victim contract (individual action plan) on frequency and method of contact to set expectations</b>	We'll be introducing an individual action plan to all hate incident cases, which includes frequency & method of contact as agreed with the victim. Victims will

	<p>have a named officer to contact to report any further incidents.</p>
<p><b>Importance of a victim centred approach, including a detailed action plan and ensuring actions align with the harmed person's desired outcome</b></p>	<p>Our initial assessment questions have been updated so that victims are asked "what would you like to happen?".</p> <p>As above, an individual action plan will be completed for all hate incident cases.</p>
<p><b>Stronger action against perpetrators, with eviction as a potential consequence for repeat offenders</b></p>	<p>We will be victim centred in our approach and will take victims views into consideration when deciding what action to take, prioritising their safety and wellbeing. We will take action at the earliest opportunity.</p> <p>There is a clear legal framework we must follow before we can take enforcement action. This requires us to build a case, which includes evidence from witnesses and demonstrates that the action we are taking is a proportionate response.</p> <p>This involves working with perpetrators to address the underlying causes of the behaviour, with the aim of stopping the incidents from continuing.</p> <p>The consequences of continuing hate behaviour is made clear to perpetrators. If someone has been offered support but does not engage and their hate behaviour continues, we will take enforcement action. This may include applying to court for possession of their home.</p> <p>Where eviction is not an option, we will seek to explore alternative legal remedies such as injunctions.</p> <p>Housing Officers will receive ongoing refresher training on legal tools and powers and how to work with perpetrators with vulnerabilities. Officers will also receive training on explaining processes and gathering evidence.</p>

<b>Use an independent organisation or person to check that documents and policies are accessible for residents with learning disabilities</b>	We will be working with SpeakOut Brighton to ensure that the policy is accessible for residents with learning disabilities.
<b>Ensure information is accessible, provided in a variety of formats and languages</b>	<p>We will provide information in languages other than English and information in alternative formats including braille, large print, easy read and audiotape.</p> <p>Alternatives to written incident diary sheets, such as the use of voice recording technology will be offered.</p> <p>We will provide support with translation.</p>
<b>More proactive, transparent and consistent actions by Housing to address hate incidents</b>	<p>We are expecting that the introduction of the senior oversight role will ensure more proactive, transparent and consistent actions by Housing to address hate incidents.</p> <p>The senior oversight role will include monitoring of live cases, reviewing case closure surveys, an annual review of case outcomes and responsibility to oversee training, which is expected to improve Housing's response addressing hate incidents.</p>
<b>When asked about policy wording, 34.2% of respondents preferred 'Person experiencing discrimination', followed by 'Victim' (32.9%)</b>	With such a close margin between the two terms 'person experiencing discrimination' and 'victim', we have decided to keep using 'victim'. This is in line with other policies and to ensure the policy is widely understood by all, including residents with learning disabilities.
<b>Information on crime within the area to be made available to Homemove applicants bidding on properties &amp; residents to be informed when individuals with known ASB histories are moved into their area</b>	<p>If someone is moving under a priority transfer due to hate incidents and is offered a property, we will look to offer the option of viewing hate crime statistics for the area.</p> <p>We are not able to inform residents when individuals with known ASB histories are moved into their area due to data protection.</p>

	Residents are able to access information on crime within the area via the Sussex Police website <a href="#">Your area   Sussex Police</a> .
<b>Ensure officers are properly trained to respond to hate incidents</b>	<p>We will be organising training and briefings to ensure that staff recognise hate incidents, know how to respond and take action in line with our policy.</p> <p>This includes the following frontline teams, Housing Customer Services, Tenancy Services, Temporary Accommodation, Tenancy Sustainment Team, Housing Income Management, Repairs &amp; Estates.</p>
<b>Option to report anonymously &amp; reassurance for victims &amp; witnesses about how information will be stored and used</b>	<p>We have added extra detail to the policy, including a link to the new <a href="#">privacy notice</a> which explains how information is collected, used and shared.</p> <p>We have also added that it is possible to make an anonymous report online via the council's website, however it is likely that we will be limited in the actions we can take and will not be able to share any updates with the reporter.</p> <p>We have included further information on how to report to third party organisation, True Vision.</p>

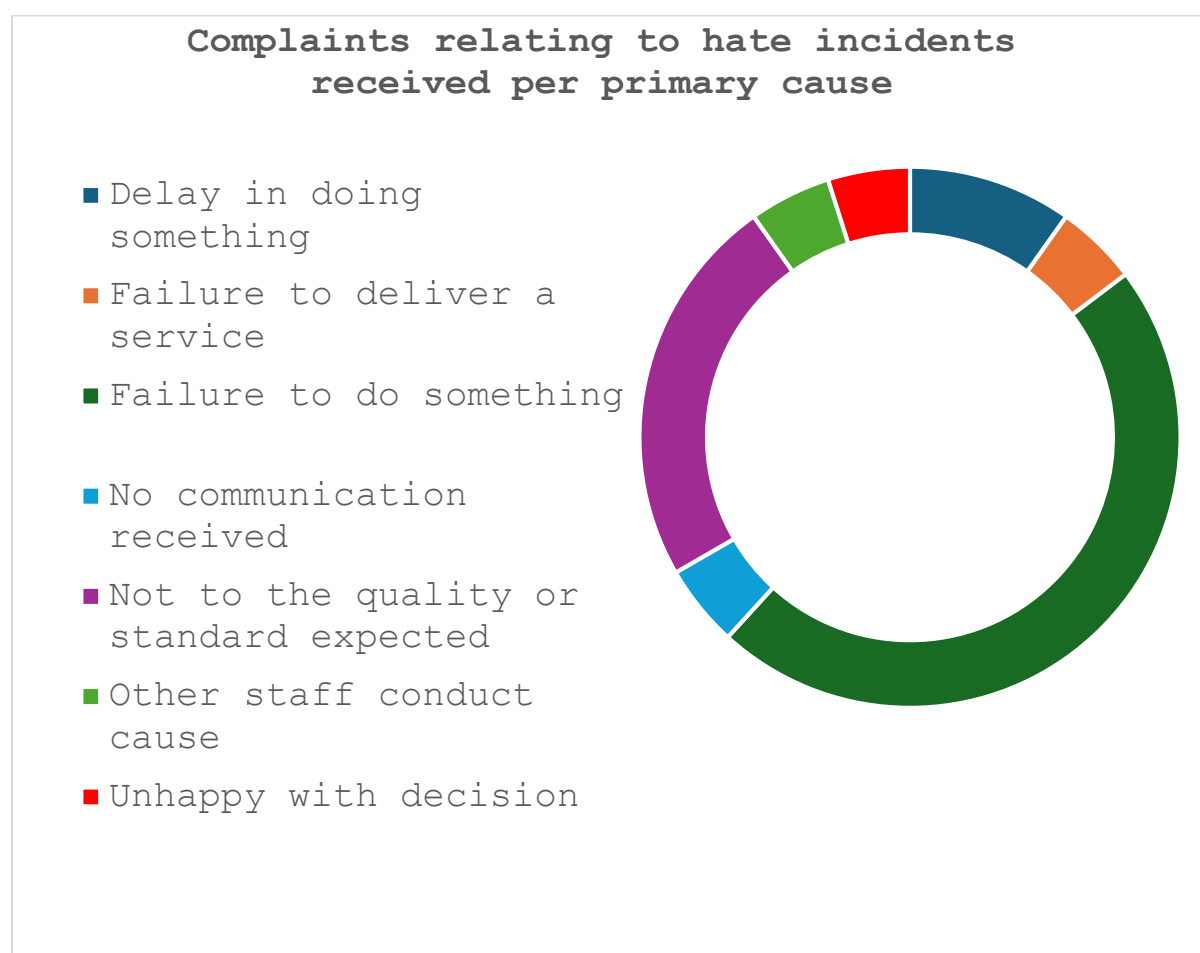
## 5.Next steps.

A final draft of the Hate Incident Policy and accompanying equality impact assessment will be signed off by the Corporate Director for Homes & Adult Social Care in consultation with the lead member for Housing following the council's Overview & Scrutiny Committee in September 2025. It is anticipated that the policy will be fully implemented by March 2026.

## Appendix A: Analysis of Stage 1 Complaints

Stage 1 complaints between 2019 – 2023 were reviewed as part of the process creating the draft policy. The sample consisted of both partly upheld (38%) and cases that were not upheld (62%).

When looking at Stage 1 complaints relating to the handling of hate incidents cases, the majority of primary causes were due to failure to do something (48%). This is followed by complaints where it was not to the quality or standard expected (24%) and a delay in doing something (10%). The lowest proportion of complaints were due to a failure to deliver a service (5%), no communication received (5%), other staff conduct cause (5%) and unhappy with decision (5%).



## Appendix B: Main consultation questions

(Saved as a separate PDF doc)

## Appendix C: Lived experience survey questions

(Saved as a separate PDF doc)

## Appendix D: Equalities Information

A range of questions were asked to profile the respondents, ahead of the equalities monitoring questions:

- 91.2% were responding as an individual and 8.8% on behalf of a group or organisation.

- The three most common postcode areas respondents gave were BN1 1 (12.3%), BN2 9 (8.8%) and BN2 0 (8.8%).
- A majority of 56.1% answered that the type of housing they lived in was 'Council housing (including leasehold)' followed by 'Owner Occupier' (12.3%), Private rented housing (10.5%) and 'Temporary or emergency accommodation, including Seaside Homes (5.3%).'.

Respondents were asked whether they wanted to answer the equalities monitoring questions, of which 58% answered 'Yes' with the remainder choosing 'No' or not answering. Of those who chose they would answer these questions:

- **Age:** 32% were 55 or over and 26% were under 55 (42% did not answer)
- **Physical or mental health conditions or illnesses lasting or expected to last 12 months or more:** 46% 'Yes' followed by 11% 'No' and 3% 'Prefer not to say' (40% did not answer). As a follow up question, respondents were asked whether any of their conditions or illnesses reduce their ability to carry out day to day activities: 28% chose 'Yes, a little' followed by, 'Yes, a lot' (16%) and 'No' (1%) (54% did not answer). There was also an option to select one or more specific conditions or illnesses, those most chosen in order included: The two categories which 5% or more of respondents selected were long-term physical illnesses or health conditions (15%), mental health differences (14%), physical differences substantially limiting basic activities (9%) and learning differences (6%).
- **Ethnic origin:** although 42.2% did not answer, the most commonly selected categories otherwise were 'White: English, Welsh, Scottish, Northern Irish, British' (35.1%), 'White: Other' (7%), 'Asian / Asian British: Indian' (3.5%) and 'Mixed: any other mixed / multiple ethnic background' (3.5%). There were several other ethnic groups chosen by one respondent each (1.8% of respondents) including 'Other Ethnic Group: Arab', 'Mixed: Black Caribbean and White', 'Mixed: Asian and White', and 'Black / Black British: African.'
- **Religion, faith or belief:** other than those who didn't answer (42.1%) the most common categories selected were: 'No religion' (24.6%), 'Christian' (15.8%), 'Muslim' (3.5%), 'Spiritual' (3.5%) and 'Another religion, faith or philosophical belief.' There were several other categories chosen by one respondent each (1.8% of respondents): 'Agnostic', 'Buddhist', 'I do not follow any faith, religion or belief.'
- **Gender:** the most common answers were 'Female' (29.8%), 'Male' (26.3%), 'Prefer not to say' (1.8%) and 'Prefer to self describe' (1.8%) and 40.4% gave no answer. Respondents were also asked whether they consider themselves trans or have a trans history, to which 3.5% selected 'Yes', 54.4% 'No', 1.8% 'Prefer not to say' (40.4% gave no answer).
- **Sexual orientation:** other than those who gave no answer (40.4%) the most commonly selected answers were 'Heterosexual or straight' (26.3%), 'Gay' (14%), 'Prefer not to say' (7%) and 'Asexual' (5.3%). There were several other

sexual orientations chosen by one 1.8% of respondents each including 'Bisexual or Bi', 'Lesbian', 'Queer' and 'Prefer to use another term'.

## **Appendix E: Groups and organisations who submitted a consultation response**

Sussex Police

Victim Support

Hampshire Court resident

Brighton & Hove City Council

## **Appendix F: List of External Stakeholders**

The consultation was shared with the following groups and organisations, who were invited to submit a response and share amongst their communities:

### **Local organisations**

1. Across rainbows
2. A seat at the table
3. Amaze Sussex
4. African Centre for Development and Research
5. Area Panel members
6. Black & Minority Ethnic Community Partnership (BMECP)
7. Bodhisattva Kadampa Meditation Centre
8. Bridging Change
9. Brighton Black Anti Racism Community Organisation (BARCO)
10. Brighton & Hove Faith in Action
11. Brighton & Hove Housing Coalition
12. Brighton & Hove Interfaith Contact group
13. Brighton & Hove Jewish Community
14. Brighton & Hove Jewish Welfare Board
15. Brighton & Hove LGBT Switchboard
16. Brighton & Hove Muslim Forum
  
17. Brighton & Hove Muslim Women's Group
18. Brighton & Hove Older People's Council
19. Brighton & Hove Workers Forum
20. Brighton & Hove Yemeni Community Association
21. Brighton & Hove Youth Council
22. Brighton Advice Centre
23. Brighton Housing Trust (BHT)
24. Brighton Unitarian Church
25. Brighton Women's Centre
26. Brighton YMCA

27. Carers Centre
28. Carousel
29. Change Grow Live
30. Chapel Royal
31. Chinese Educational Development Project
32. Citizens Advice (Brighton & Hove)
33. Conversation Over Borders
34. Emmaus
35. Fresh Youth Perspectives
36. Friends, Families and Travellers
37. Grace Eyre Foundation
38. Hangleton & Knoll project
39. Hove Hebrew congregation
40. Just life
41. Leaving Care Team
42. mASCot
43. MindOut
44. Mosaic Black Asian and Mixed Parentage Family Group
45. Multicultural Group Brighton & Hove
46. Network of International Women for Brighton & Hove
47. Oromo Community in Brighton & Hove
48. Possability People
49. Racial harassment forum Brighton & Hove
50. Radical Rhizomes
51. Refugee Radio
52. Rise
53. rYico
54. Sanctuary on Sea
55. Sikhs of Sussex
56. Speak Out Brighton & Hove
57. SSAFA Sussex
58. St Luke's Prestonville
59. Sudanese Coptic Association
60. Sussex Friends of Israel
61. Sussex Indian Punjabi Society
62. Sussex Police hate crime lead
63. Tenant & Residents Associations
64. The Clocktower Sanctuary
65. The Ledward Centre
66. The Migrant English Project
67. The Rainbow Hub
68. Trans Pride Brighton
69. Trust for Developing Communities
70. The Wellbeing Hub at Preston Park
71. University of Sussex BAME staff network
72. QTIPoC Narratives



73. Voices In Exile
74. Women of colour Brighton
75. Youth Advice Centre (YAC) Brighton
76. Writing our legacy

### **Resident & community groups:**

1. City Point Residents Association
2. North Laine Community Association
3. Sylvan Hall Residents Association
4. Wiltshire House Residents Association
5. Friends of Brighton and Hove Hospital
6. Kingscliffe Society Newsletter
7. Patch News
8. Preston Pages
9. Queens Park Living
10. Roundhill Reporter
11. Turner News
12. Warwick Mount Residents Association
13. Withdean and Patcham Magazine
14. Exeter Street Hall Community Centre
15. Aging Well Mailouts
16. BHFCP, Our Voice
17. Bricycles
18. Brighton & Hove Magazines (Commercial)
19. Brighton & Hove Organic Gardening Shop
20. Gscene
21. Leaseholders Action Group
22. Sussex ME Society
23. The Pensioner
24. U3A Brighton & Hove
25. Marina Local Action Team
26. Robert Lodge Community Space Group
27. Due East
28. Saltdean Residents Association
29. Woodingdean News
30. Woodingdean Tenants and RA Newsletter
31. Moulsecoomb Local Action Team
32. Patcham Local Action Team
33. Bevendean Bulletin
34. Friends of Blakers Park
35. Hollingdean News
36. Moulsecoomb & Bevendean LAT
37. Highcroft Lodge Residents Association
38. Brunswick and Adelaide Local Action Team
39. Philip Court Residents Association

- 40. Portslade Local Action Team
- 41. Portslade Village Green Residents Assoc
- 42. West Hove Forum
- 43. Clarendon and Ellen RA
- 44. Hangleton Harbinger
- 45. Hove Park Living
- 46. Knoll Scroll
- 47. Portslade Community Forum
- 48. The Scroll
- 49. West Hove Directory

## Version Control

Version	Date	Author	Changes
1.0	3 July 2025	Helen Burrow	Final draft report created to share with HLT
1.1	9 July 2025	Helen Burrow	<ul style="list-style-type: none"> <li>Added “Housing” to references of Hate Incident Policy in title &amp; within Executive summary</li> <li>Exec summary - added acknowledgement of the contributions of residents to consultation in first line</li> <li>Exec summary – “increased staffing within Tenancy Services” updated to “We have increased staffing within the Tenancy Team in 2025”.</li> </ul>

			<ul style="list-style-type: none"> <li>• Exec summary - Removed Repairs &amp; Estates from “Refresher training for all customer facing Housing teams” (and added customer facing)</li> <li>• Consultation outcome – added individual action plan in brackets after victim contract.</li> <li>• Consultation outcome – added “We will be victim centred in our approach and will take victims views into consideration when deciding what action to take, prioritising their safety and wellbeing. We will take action at the earliest opportunity” and minor rewording of following paras including “This involves working with perpetrators to address the underlying causes of the behaviour, with the aim of stopping the incidents from continuing. The consequences of continuing hate behaviour is made clear to perpetrators. If someone has been offered support but does not engage and their hate behaviour continues, we will take enforcement action. This may include applying to court for possession of their home.”</li> <li>• Consultation Outcome – added feedback on accessibility “Ensure information is accessible, provided in a variety of formats and languages” and our response “We will provide information in languages other than English and information in alternative formats including braille, large print, easy read and audiotape. Alternatives to written incident diary sheets, such as the use of voice recording technology will be</li> </ul>
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			offered. We will provide support with translation”.
1.2	5 Aug 2025	Justine Harris	<ul style="list-style-type: none"> <li>• Minor format changes</li> <li>• Updated implementation date to March 2026</li> </ul>

## General Equality Impact Assessment (EIA) Form

### 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>Hate Incident Policy</b>
<b>Directorate:</b>	Housing, Care & Wellbeing
<b>Service:</b>	Housing
<b>Team:</b>	Performance & Improvement Team
<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 Yes, please use this to inform this assessment)</b>	Recent ASB Policy does not have an EIA  EIAs from HM10 EIA Tenancy Management and HM04 Anti-social behaviour EIA 2017 FINAL May18, HCW107-12-Sep-2024-Housing-Strategy-24-29 & changes to the Allocations Policy EIA will be taken into consideration.

### 2. Contributors to the assessment (Name and Job title)

<b>Responsible Lead Officer:</b>	<b>Justine Harris, Head of Tenancy Services</b>
<b>Accountable Manager:</b>	<b>Justine Harris, Director of Housing &amp; People Services – Tenancy Services</b>
<b>Additional stakeholders collaborating or contributing to this assessment:</b>	Laura Stanbridge, Business Change Manager Tom Matthews, Housing Performance Analyst Jan Dowdell, Tenancy Services Operations Manager Eric Page, 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:

Housing does not currently have a Hate Incident policy in place and there is limited reference within the existing Anti Social Behaviour (ASB) policy.

The Consumer Standards for Social Housing came into effect on 1 April 2024. Under the Neighbourhood & Community Standard 2.2.2 "*Registered providers must clearly set out their approach for how they deter and tackle hate incidents in neighbourhoods where they provide social housing*".

The new policy is a statement of intent concerning how Housing will tackle hate incidents experienced by its residents. It includes definition of hate incidents, how Housing will respond to reports of hate incidents and ensure that victims receive appropriate support, whilst working with perpetrators to address behaviour using supportive interventions and enforcement. It is not within the scope of the policy to deal with hate incidents against employees.

The final policy will complement the [Anti social behaviour policy](#) and where appropriate should be read in conjunction with it.

What are the desired outcomes of the activity?

To have a hate incident policy and working procedures in place for Housing (general needs, Seniors, Temporary Accommodation & Seaside Homes).

To ensure the policy matches the needs of residents, is implemented in a fair way and any negative impacts on groups with protected characteristics are understood.

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

The policy defines how Housing will manage [hate incidents](#) experienced by residents who live in or regularly visit areas where we own/manage Housing. This includes 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.

##### Consultation carried out:

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. Housing will be developing a revised Tenant Engagement Strategy in 2025 / 2026 to enhance our engagement offer and increase representation to better reflect the demographic of the city.

The development of proposals in the draft hate incident policy was informed by other consultation and engagement exercises that considered housing issues. This included feedback received from ASB policy and Housing Strategy consultations. In addition to working with internal stakeholders, an analysis of complaints concerning ASB / Hate cases between 2022-2024 to identify common trends and areas needing improvement, review of Housing Ombudsman complaints and feedback from Victim Support who responded to a mail out to local third sector organisations inviting initial feedback.

A formal consultation of 11 weeks took place from 9 September to 2 December 2024 using the council's engagement platform, Your Voice. The platform is compatible with international accessibility standards for web content. It also has the option for people to complete a survey in any of the 10 most spoken languages in Brighton & Hove. An Easy Read survey 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. Large print, hard copy surveys were available on request by email or phone. The option to complete the survey by phone was publicised via the Community Engagement Team, Homing In, Area panel meetings and targeted engagement to tenants. Two in person consultation events were held in

October 2024 to accommodate those who had requested face to face engagement. The consultation was also promoted via a mail out to local third sector organisations and community groups.

#### Headline consultation data

We received 57 responses to the main online consultation survey on the draft policy and 9 responses to a supplementary survey experience of reporting a hate incident to Housing.

91.2% of responses were from individuals and 8.8% of responses were on behalf of a group or organisation.

Most of the proposals within the draft Hate Incident policy received agreement. Agreement with each of the proposals by respondents to the consultation ranged from 53.4% to 73.4%. However, just 31.6% of respondents agreed that the council is doing enough to promote awareness of action Housing can take in response to hate incidents.

For detailed information on the consultation, including details of the stakeholders consulted and detailed feedback on the proposals, see the Consultation Report on [Your Voice](#).

## 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.

(State Yes, No, Not Applicable as appropriate)

<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>	NO
<b>Pregnant people, Maternity, Paternity, Adoption, Menopause, (In)fertility (across the gender spectrum)</b>	NO
<b>Armed Forces Personnel, their families, and Veterans</b>	NO
<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>	NO
<b>Domestic and/or Sexual Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)</b>	NO
<b>Socio-economic Disadvantage</b>	NO

<b>Homelessness and associated risk and vulnerability</b>	NO
<b>Human Rights</b>	YES
<b>Another relevant group (please specify here and add additional rows as needed)</b>	Not applicable

**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, numeracy and /or digital 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?

While equalities data is collected, this is often incomplete or partial. It is also not done consistently or across all teams within Housing. 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. Whilst due to processes in place, reliable data on ASB is not available for temporary accommodation clients prior to 2025. 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 on NEC. It would also be difficult to keep track of this data during the lifetime of a tenancy. Whilst data is collected on NEC for armed forces, there are currently only 7 council tenants, which is likely to be an undercount. Whilst there are 48 temporary accommodation residents recorded as having served in the armed forces. This figure is more likely to be accurate as the data is collected as part of the homelessness application.

The hate incident policy includes a risk assessment carried out following the first contact, which will be updated to collate the five main protected characteristics covered by the definition. The accompanying procedure will prompt officers to ensure that the data is updated on NEC.

However, we likely need to improve our awareness of intersectionality and barriers due to layers of identities around which today we do not gather or analyse data. Data gathering needs improvement and some of these gaps may be addressed in an updated Allocations Framework EIA, a wider Housing Strategy and EIA actions that result from this policy.

What are the arrangements you and your service have for monitoring, and reviewing the impact of this activity?

Satisfaction surveys are completed upon case closure.

It is proposed that the number of new hate incident cases, including by type and locality, will be publicised on the website quarterly. This will build on the recently introduced TSM, “*Number of anti-social behaviour cases that involve hate incidents opened per 1,000 homes.*”



The policy also proposes a senior oversight role, whereby responsible managers will monitor open hate incident cases and complete an annual review of case outcomes. This will improve our oversight of case handling.

A complaints project is currently underway focused on embedding learning from complaints and assigning oversight responsibilities to a senior manager in Housing who will lead on operational complaints.

## 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](#).

## 6.1 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.

Age is not one of the characteristics/strands protected by hate crime legislation. It is however intrinsically correlated to other protected characteristics particularly around disability and health issues.

According to the 2021 Census data, around a third of residents (aged 16 or over) in Brighton & Hove of all tenures are between the ages of 40 and 64 (36%) which is less than council tenants (53%), therefore the age profile of council housing is generally older than residents of all tenure in city. Whilst data for Temporary Accommodation (TA) reflects that people aged 20–49 are disproportionately in housing need, with 75% of persons living in temporary accommodation from this age group.

Analysis of hate incident cases recorded on our Housing Management system, NEC, between July 2021 to March 2024 shows there tends to be lower proportions of younger and older people among both victims and perpetrators when compared with council tenants. Similar proportions of both victims (64%) and perpetrators (65%) are between the ages of 40 and 64, which is higher when compared with the general population of council tenants (53%). This age group is most likely to be impacted by the policy's proposals. It is worth noting that ASB data for Temporary Accommodation is not available and therefore the lower limit of the age range impacted by hate incidents is likely to be lower.

Staff should therefore have a good understanding of the specific needs and challenges facing these groups. Children are also most likely to be part of households for tenants aged 20-49, which is particularly relevant for households living temporary accommodation.

The consultation on the draft hate incident policy included no responses from children and younger people under the age of 24 or adults 85+. Responses were received from adults aged 25 – 84 years, with 31.5% of responses from adults aged 45 – 64 – the group most likely to be impacted by the policy's proposals. One respondent suggested the definition within the policy is widened to include age, “as some people discriminate against the elderly and very young”.

**See Appendix 1 for data (Tables 1 – 3).**

More intersectional impacts have been discussed in *Section 6.18 Cumulative, intersectional, and complex impacts*.

## 6.2 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.

Disability hate crime is one of the most under reported types of hate crime, despite anecdotal evidence suggesting it is frequently experienced by disabled people. Whilst most disability hate crimes also occur on the street, there is a higher proportion that occur in a dwelling than seen in other types of hate crime, and disability hate crimes are also more likely to be perpetrated by someone who is known to the victim (Community safety and crime reduction strategy 2023 to 2026). Consequently, it is likely that disabled residents will be disproportionality impacted compared to residents with other protected characteristics.

In 2023/24 Sussex Police recorded 68 disability-related hate crimes and incidents, of which 60 were explicitly recorded as crimes - a 21% reduction from the 86 crimes and incidents recorded in 2022/23. In the first six months of 2024/25 a further 32 crimes and incidents were recorded, slightly fewer than the 38 in the same period in the previous year. The overall reduction in disability motivated crimes and incidents is very similar to the 18% reduction seen across England and Wales in 2023/24. Whilst figures are not available for Temporary Accommodation, Council Housing recorded three disability-motivated hate incidents, the same number as in the previous year (Community Safety Team Strategic Assessment, 2024).

When looking at the 2021 Census data, a much lower proportion of residents of Brighton & Hove of all tenures have a long-term health problem or disability (19%) when compared council tenants (49%) and temporary accommodation residents (28%).

An analysis of hate incident cases (all types of hate incident) recorded on our Housing Management system, NEC, between July 2021 to March 2024 shows a lower proportion of victims have a long-term health problem or disability (53%) compared to perpetrators (61%). However, when compared to council tenants as a whole (49%), both victims and perpetrators are more likely to have a long-term health problem or disability.

However, when it comes specifically to disability related hate incidents, all the victims have a long-term health problem or disability (100%) compared to 33% of the perpetrators.

More detailed data from NEC indicates that a significant number of victims and perpetrators report experiencing mental health issues. Perpetrators are significantly more likely to be experiencing mental health issues than victims, which is a notable gap in terms of the proportions. Smaller proportions of both victims and perpetrators are recorded as having learning difficulties, a hearing or speech impairment, substance or alcohol issues. Whilst a small number of victims had a visual impairment recorded, this was not recorded for any perpetrators.

Detailed data on whether victims and perpetrators have a physical disability is not available as this is currently not recorded on our IT systems within Housing.

The available data indicates that mental health issues are a significant factor in case referrals, mental health awareness training should be made available to all staff managing cases along with ensuring that they are aware of the local services available.

45.6 % of respondents to the consultation on the draft incident policy reported having a physical or mental health condition or illness lasting or expected to last 12 months or more. Of those who answered, 43.9% indicated that any of their conditions or illnesses reduced their ability to carry out day to day activities. There was also an option to select one or more specific conditions or illnesses, those most chosen in order included: The two categories which 5% or more of respondents selected were long-term physical illnesses or health conditions (14.9%), mental health differences (13.8%), physical differences substantially limiting basic activities (9.2%) and learning differences (5.7%). Suggestions to improve the response of Housing included taking a victim centred approach adapted to the needs of the individual, ensuring those harmed by hate are aware they can use an advocate, tailoring communication to individual's needs and using an independent organisation or person to check that documents and policies are accessible for residents with learning disabilities.

It is recognised that mental, social, and behavioural health issues could create a barrier for accessing the service. Those who have experienced hate incidents may have a reduced level of mental wellbeing generally and as a result of experiencing hate-based behaviour. There are several ways that hate incidents can be reported both electronically, by phone and in person (proposal currently being explored to offer in person contact via housing office surgeries) including through support workers and emergency

services to support victims. It is therefore not anticipated that there will be any differential experience or impact of the policy itself based on disability.

The policy is likely to have an overall positive impact on disabled residents because we take a victim centred approach adapted to the needs of the individual and work with perpetrators to identify support needs which may address the underlying causes of their behaviour.

Data analysis conducted as part of the recent Housing Strategy identified collection of data on disability within housing services is not consistent and there is evidence of under-reporting. This requires improvement and is addressed within the recommendations within the [Housing Strategy EIA](#).

**See Appendix 1 for data (Tables 4 – 10).**

More intersectional impacts have been discussed in section 6.18 *Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

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).

The policy aims are not expected to adversely affect any protected characteristic. The policy is expected to have a positive impact on all protected groups through the provision of a robust and consistent approach which is victim centred and considers the needs and vulnerabilities of those experiencing and perpetrating hate incidents. By taking the individuals requirements into consideration, any adjustments mentioned above will be made as required.

Relevant proposals identified in the hate incident policy include:

- Victim centred & trauma informed approach
- Referral or signposting victims to other organisations for support, such as Victim Support
- Working with perpetrators to identify unmet support needs
- Senior oversight of all hate incident cases
- Seek to support external advocacy

Therefore, it is anticipated that measures set out in hate incident policy are likely to have a positive impact on disabled people.

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

Does your analysis indicate a disproportionate impact relating to ethnicity?	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.

Home Office figures show that religious hate crime recorded by police in England and Wales has risen by 25% between 2023 – 2024 compared with the previous year, driven mainly by a rise in offences since the beginning of the Israel-Hamas conflict. 140,561 of the hate crime offences recorded, 7 in 10 are shown to have been motivated by race (see [Resolve, Community cohesion and hate crime amidst growing worldwide tensions, Oct 2024](#)).

This national trend is reflected locally. In 2023/24 Sussex Police recorded 606 racially motivated hate crimes and incidents in the Brighton & Hove. Over this same period, there were 119 police-recorded

religiously motivated hate crimes and incidents in the city in 2023/24, nearly twice as many as the 63 recorded in the previous year. A substantial increase in recorded cases was observed at the beginning of the Israel-Palestine conflict in October 2023; 15 and 24 religiously motivated crimes and incidents were reported in the city in October and November 2023 respectively. Numbers of cases recorded each month reduced substantially following then, however recorded cases remain higher each month than before the beginning of this conflict.” (Community Safety Team Strategic Assessment 2024). Less than five religiously motivated hate incident cases were reported to council housing for 2023/24, however it was an increase compared to the previous year, when none were recorded.

Research from Sussex University has shown, that knowing other people who have experienced hate crime increased individuals’ perceptions of threat, which in turn was linked to increased feelings of vulnerability, anxiety and anger ([The Sussex Hate Crime Project: final report, 2023](#)). Despite this, hate crime is under-reported, there are various reasons for this, however some common reasons are lack of confidence in authorities, lack of knowledge about how to report, fear of retaliation and a lack of insight into what constitutes a criminal offence (see [Resolve, Community cohesion and hate crime amidst growing worldwide tensions, Oct 2024](#) ).

Data from the Census 2021 indicates more than a quarter of residents, 26% are non-White UK/British from Black and racially minoritised groups. Higher than seen in the South-East (21%) but similar what is found in England (27%).

When looking at the 2021 Census data, a higher proportion of residents of Brighton & Hove of all tenures are Black and Racially Minoritised (26%) than council tenants (16%) although data is not held on this characteristic for 9% of council tenants (of which 8% prefer not to say and 1% with no data). Whereas Temporary Accommodation residents, when compared to all residents of Brighton & Hove, are less likely to be White British or White Minoritised, and more likely to be Black or Black British or categorised as part of another ethnic group.

An analysis of hate incident cases recorded on our Housing Management system, NEC, between July 2021 to March 2024 shows when it comes to ethnic group, a higher proportion of victims are Black and Racially Minoritised (59%) compared to perpetrators (4%) and council tenants generally (16%). When it comes specifically to racial hate incidents, a much higher proportion of victims are Black and Racially Minoritised (74%) compared to perpetrators (4%).

Although a distinct category to ethnicity, data is also recorded which indicates whether someone has English as a second language, which applies to less than five victims (6%) and less than five perpetrators (6%). Of these, none of the victims and less than five of the perpetrators were recorded as requiring translation.

Whilst 42.2% of respondents to the consultation on the draft hate incident policy chose not to specify their ethnicity, of those who responded, 14.2% of respondents identified as Black and Racially Minoritised and 7% who identified as ‘White: Other’. One consultation respondent disclosed that they felt discriminated against by a council officer when making their report of a hate incident, suggesting there should be measures in place to protect against this.

Feedback received from Victim Support highlighted a perceived disparity in the level of service provided to residents from black and racially minoritised communities *“We have been told by victims from an ethnic background - Race/Nationality, often where there are multiple victims in the same surrounding location, that they are not in receipt of a named officer, or that they have been told there will be a named officer to whom they report to or will be contacted by, having the responsibility for coordinating and maintaining communication with residents and other agencies. We would absolutely welcome a named officer who has overall coordination and responsibility of maintaining communication with residents.”*

This was echoed within responses to the Housing Strategy consultation, received on behalf of Brighton & Hove Community Voices and Bridging Change, groups working to challenge systemic barriers to Black, Asian and racially minoritised groups. Voices in Exile representing refugees and asylum seekers and SJOG Hospitaller Services who work with victims of trafficking and modern-day slavery also responded. Issues identified by respondents included:

- 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

Feedback received as part of the consultation on the draft hate incident policy included suggestions for accommodations where English is not spoken as a first language, including ensuring information is accessible, provided in a variety of formats and languages. One respondent wrote *“At present, aside from emailing or calling Housing Customer Services it is not clear how someone whose first language is not English and they are not fluent can easily be signposted to contact the Council. They may not even read/write their own language so trying to understand different groups who could make contact would be helpful.”*

The policy proposes to create a support plan (RA2) for all victims of hate incidents, which details agreed frequency and method of communication between the victim and a named officer (single point of contact, SPOC). The procedure will also prompt officers to offer referrals as appropriate. Cases will be overseen by a senior oversight role to check that offers of referrals and communication preferences are recorded.

**See Appendix 1 for data (Tables 11 – 15).**

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. More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

#### 6.4 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.

As mentioned above, religious discrimination and hate crime has significant intersections with ethnicity, ‘race’ and ethnic heritage. There has been a significant increase in religiously motivated crimes and incidents in the city. This is also reflected nationally, whilst there was an overall decrease in hate crime the year ending 2024), religious hate crimes increased by 25% compared with the previous year ([Home Office, Hate crime, England and Wales, year ending March 2024](#)).

When looking at the 2021 Census data, over half of residents of Brighton & Hove of all tenures have no religion or belief (55%) which is more than for council tenants (23%) and higher than the England average (36.7%). Of the council tenants with data recorded about their religion or belief, 46% were Christian and 40% had no religion or belief, so it is likely than a higher proportion of council tenants have a religion compared to citywide residents. Information on religion or belief is not recorded for temporary accommodation residents.

An analysis of hate incident cases (all types of hate incident) recorded on our Housing Management system, NEC, between July 2021 to March 2024 shows people with no data for religion or belief (including those who prefer not to say) made up around half of both victims (48%) and perpetrators (51%), both of which are higher than for council tenants more generally (41%).

Of those with a religion, a higher proportion of victims are Christian (35%) than are perpetrators (18%) or council tenants generally (27%). A higher proportion of perpetrators have no religion or beliefs (27%) when compared to victims (4%). A higher proportion of Muslim residents are victims (6%) when compared to council tenants generally (4%). The same can also be said for Jewish residents where there are a higher proportion of victims (4%) than council tenants generally (0.3%). Whilst there are no hate incidents where Muslim or Jewish residents are the perpetrators.

42.1% of respondents to the consultation on the draft hate incident policy chose not to specify their Religion, faith or belief. Of those who did respond, the most common categories selected were: ‘No

religion' (24.6%), 'Christian' (15.8%), 'Muslim' (3.5%), 'Spiritual' (3.5%) and 'Another religion, faith or philosophical belief.' There were several other categories chosen by 1.8% of respondents: 'Agnostic', 'Buddhist', 'I do not follow any faith, religion or belief.'

Housing staff need to be aware of the impact of cultural considerations such as dates of significance limiting customer's availability or conservative household systems that need culturally sensitive engagement and management, particularly when working with victims. As a result, the procedure will prompt staff to consider cultural considerations.

Data shows an increase in religiously motivated hate crimes & incidents in the city in response to the recent Israel-Hamas conflict. The policy recognises external factors may place certain people at heightened risk. As a result, a question has been added to Part B of the risk assessment to ensure that officers consider the impact of media and global conflicts.

There is a need to improve data collection and analysis by housing services (particularly within Temporary Accommodation) in relation to religion or belief as set out in the recommendations in section 7.

**See Appendix 1 for data (Tables 16 – 18).**

More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

## 6.5 Gender Identity and Sex:

**Does your analysis indicate a disproportionate impact relating to [Gender Identity](#) and [Sex](#) (including non-binary and intersex people)?**

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.

Sex/gender like age is not recognised within the strands protected by hate crime legislation. People may, however, have more than one characteristic which could make them more vulnerable and could increase the risk of being harassed or abused. 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.

Victims are more often male for racist or religiously motivated and homophobic hate crimes, but this is different for both disability and transphobic offences, which are more likely to have a female victim (Community safety and crime reduction strategy 2023 to 2026).

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%).

The proportion of female residents in temporary accommodation and council properties is significantly higher than for adult residents of Brighton & Hove as a whole, 61% for temporary accommodation and 60% for council housing. A factor which is apparent here is the likelier presence of children in a household, which gives a household priority need under the main housing duty. Further analysis on this for Temporary Accommodation is available within Appendix 1, table 21.

An analysis of hate incident cases recorded on our Housing Management system, NEC, between July 2021 – March 2024 shows there are equal numbers of male (49%) and female (49%) victims, with a slightly higher proportion of perpetrators are female (52%) than male (48%). By contrast, both groups have a smaller proportion of females when compared to tenants generally (60%), meaning females are underrepresented among both victims and perpetrators of hate incidents.

Marginally more females than males responded to the consultation on the draft hate incident policy (29.8% & 26.3% respectively). A high number of respondents gave no answer or chose 'prefer not to say' when asked to describe their gender (42.2%).

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 and 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 and 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. NEC & Home Connections currently records whether tenant/residents are transgender, with no further breakdown (i.e. trans woman / trans man) or option of selecting another gender identity. Our records indicate that currently 42 tenants in council housing and 10 residents in temporary accommodation identify as transgender.

The Trans Needs Assessment undertaken by the council in 2015 identified the need to improve data collection in relation to gender reassignment and gender identity in relation to Housing. Data gaps were acknowledged within the [Housing Strategy EIA](#) and as a result, recommends that the year 2 action plan contains an explicit action to improve data collection (across all protected characteristics).

**See Appendix 1 for data (Tables 19 – 22).**

More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

## 6.6 Gender Reassignment:

Does your analysis indicate a disproportionate impact relating to <a href="#">Gender Reassignment</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.

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 and replaced with a broader umbrella term like "trans" (written evidence submitted by [Stonewall to the Transgender Equality Inquiry, 2015](#)).

In October 2022, a [Home Office report](#) said that hate crimes targeting trans people had increased by 56% in the previous year, holding discourse on social media partly responsible.

Research from the University of Surrey ([The Safe Housing Study, 2017](#)) indicated trans respondents were particularly concerned about safety in their neighbourhood, due to transphobia and transphobic hate crime. This is reflected within the feedback received from the recent consultation on the Housing Strategy which identified the following issues in relation to gender reassignment:



- 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

The data from the Census 2021 and service data in section 6.5 above give some indication of the numbers of people in the city and those using housing services who have this protected characteristic.

An analysis of hate incident cases recorded on our Housing Management system, NEC, between July 2021 – March 2024 shows there were less than five trans victims, of which the majority were victims of transphobic hate incidents. There were less than five trans perpetrators. 52 tenants identify as trans across the whole of Housing (council housing & temporary accommodation).

3.5% of respondents to the draft hate incident policy disclosed they consider themselves trans or have a trans history (42.2% gave no answer or chose 'Prefer not to say'). One respondent, when answering the question "Is there anything else you think we should offer to make sure people harmed by hate feel supported or do you have any further comments on supporting people harmed by hate?" wrote "*Don't presume that a person...would not face hate from another member of that minority group*", and carried on to explain that whether or not a trans person has undergone reassignment could result in harassment from another trans person.

**See Appendix 1 for data (Table 23).**

More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

## 6.7 Sexual Orientation:

<b>Does your analysis indicate a disproportionate impact relating to <a href="#">Sexual Orientation</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.

2021 Census data shows that more than one in ten residents aged 16 or over in the city (12%, 25,250 people) who chose to state their sexual orientation identify with a sexual orientation other than Straight or Heterosexual (Gay, Lesbian, Bisexual or another sexual orientation). The equivalent proportions were lower among council tenants (10%) and people in temporary accommodation (9%). These percentages exclude people who preferred not to answer the question, or for whom data was not held (9% of Census residents, 45% of council tenants and 42% of people in temporary accommodation).

An analysis of hate incident cases (all types) recorded on our Housing Management system, NEC, between July 2021 – March 2024 shows high numbers of victims (56%) and perpetrators (52%) without any data (including prefer not to say), both of which are higher than for council tenants more generally (45%).

Nonetheless, a lower proportion of victims are Straight or Heterosexual (29%) than perpetrators (39%) and both groups are lower than council tenants more generally (50%).

When it comes specifically to homophobic hate incidents, a much higher proportion of victims are Gay or Lesbian (50%) compared to perpetrators (0%). A sizeable number of victims identified as straight (20%) and it is not clear without further analysis as to whether they were targeted due to association with another LGB person or that they were perceived by the perpetrator to be LGB.

Feedback received from the recent consultation on the Housing Strategy raised the following issues in relation to sexual orientation:

- Impact of hate crime and the need for a zero-tolerance approach
- LGBTQ+ training for housing services staff
- Safety in emergency and temporary accommodation
- Understanding and consideration of impact of intersectional ties with other protected characteristics e.g. Age, Disability or Ethnicity

The [2009-14 LGBT Housing Strategy](#) and the [2023 LGBT Housing Manifesto](#), calls for 'high quality data monitoring around sexual orientation and trans status' in relation to Housing. Data gaps for sexual orientation were acknowledged within the [Housing Strategy EIA](#) and as a result, recommends that the year 2 action plan contains an explicit action to improve data collection (across all protected characteristics).

40.4% of respondents to the consultation on the draft hate incident policy chose not to specify their sexual orientation. Of those who responded, 26.3% identified as 'Heterosexual or straight' and 24.7% as LGB (gender data is reported on within section 6.6), whilst 7% chose 'Prefer not to say'.

Consultation feedback on the draft hate incident policy included suggestions for improvements to the council's webpages, including creating a clear support link on the homepage for LGBTQ+ individuals to report hate crimes and ensuring all links are functional.

**See Appendix 1 for data (Tables 24 – 27).**

More intersectional impacts have been discussed in *section 6.18 Cumulative, intersectional, and complex impacts*. Mitigating actions will be added section 7.

## 6.8 Marriage and Civil Partnership:

<b>Does your analysis indicate a disproportionate impact relating to Marriage and Civil Partnership?</b>	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.

## 6.9 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>	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.

The Census does not collect data on this protected characteristic nor is data routinely collected by council housing services.

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

<b>Does your analysis indicate a disproportionate impact relating to Armed Forces Members and Veterans?</b>	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.

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.

Only seven council tenants are currently recorded on the Housing Management system, NEC, which is likely to be an undercount. Whilst 48 residents in temporary accommodation are recorded as having served in the armed forces, which is more likely to be accurate as it forms part of the homeless application.

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

<b>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)</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 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.

Looking at national & anecdotal data, this group often face increased risk of hate incidents due to their ethnicity, nationality, religion, or perceived cultural differences. Race and religion are two of the hate crime categories which are most likely to affect asylum seekers and refugees ([Migrant Help, 2020](#)).

Barriers to reporting and fear of authorities can make it difficult for victims to seek help. One study found that the most frequently cited barrier was fear of the authorities based on experiences in their country of origin. Other barriers include language barriers, fear of negative repercussions (including negative impact on their immigration status), lack of awareness of what a hate crime is and lack of trust and confidence in policing systems or reporting mechanisms ([Hate Crime experiences of Refugees & Asylum Seekers, British Red Cross, 2019](#)). To ensure equal access to the service, housing staff need to be aware of the importance of organising interpreters or other language support and have some knowledge about the additional barriers faced by migrants to reporting hate incidents.

0.3% (36 of 1,853) of persons in temporary accommodation were former asylum seekers. 17.3% (320 of 1,853) were recorded as non-UK nationals at the time of their homelessness application, including the former asylum seekers. This data is recorded on Home Connections and is not collected on NEC (for council tenants), therefore is not part of the analysis of council housing hate incident cases.

Resettlement support currently commissioned by the council for migrant communities includes an intense casework service for families arriving on government resettlement programmes. Around 17 of these Afghan families are in Temporary Accommodation. There is also a dedicated small team working in homelessness prevention which works with refugees and migrants.

#### 6.12 [Carers](#):

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

No

#### 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.

Housing service data was not available for this protected characteristic.

#### 6.13 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).**

No

**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.

There are currently 192 council tenants recorded as care leavers on NEC and 31 temporary accommodation clients recorded as care leavers on Home Connections.

#### 6.14 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)**

No

#### 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.

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

Does your analysis indicate a disproportionate impact relating to Domestic Abuse and Violence Survivors, and people in vulnerable situations (All aspects and intersections)?	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.

### 6.16 Socio-economic Disadvantage:

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

Certain areas, like Hangleton and Knoll, Kemptown, Whitehawk, and Moulsecoomb, face disproportionate impacts due to low average earnings, limited access to essential services, and poorer quality housing ([Brighton & Hove Economic Evidence report, 2024](#)).

*“Socio-economic disadvantage is highly intersectional... The intersectionality between deprivation and other characteristics can be thought of as a web, where different areas connect, compounding and exacerbating each other”* (Mills, C., [A review of evidence on socio-economic disadvantage and inequalities of outcome, 2021](#)).

*“The 2015 Crime Survey for England and Wales also found that single parents, those renting social housing and people in lower income brackets were more likely to be victims of household hate crime”* (Hambly, JR., Singh, S. & Wedlake-James, T., [Hate Crime: a thematic review of current evidence, Home Office 2018](#)).

NEC Housing has the amount of arrears recorded for each household and an “Economic Status” field for both council tenants and TA clients. However, the data doesn’t appear to be up-to-date and the information is stored in a way which makes it difficult to analyse.

No Housing service data available to link specifically to hate incidents.

### 6.17 Human Rights:

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



Housing service data is not available, of the six evictions which took place between July 2021 – March 2024, none of these were related to a hate incident.

To evict someone from their home will always involve an interference with rights under Article 8. The test is whether the eviction is a proportionate means of achieving a legitimate aim. To make sure that perpetrators with protected characteristics are not disadvantaged by the policy, the procedure ensures that appropriate support is offered and / or adjustments made, and alternatives to eviction are considered.

Officers are required to complete a proportionality statement before proceeding with legal action, which is checked and signed by a manager.

#### 6.18 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, numeracy and/or digital 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

Victims of hate incidents who have a protected characteristic can be at greater risk of impact and harm than another member of the community as that factor may lead them to be more vulnerable or more impacted. This is echoed within the Community Safety and Crime Reduction Strategy 2023-26 which states “*Those harmed by incidents and crimes where people are targeted because of a disability, their ethnicity or race, religion or faith, sexual orientation or transgender identity tell us that it has a significant effect on their quality of life, wellbeing and feelings of safety.*” (p.34).

‘Intersectionality’ adds to the complexity of hate crime - victims may be targeted due to more than one of their identity characteristics. The policy recognises the impact of intersectionality, para 8.3 states “*Victims may also experience compounded trauma due to the intersection of multiple marginalized identities, such as race, gender, sexual orientation, disability, or religion. This intersectionality can result in more severe and complex consequences, affecting not only the immediate victims but also their communities. As a result, ripple effects of hate crimes extend beyond the initial incident, significantly diminishing the quality of life for affected individuals and groups.*”

Research has shown how the experience of disability is compounded when disabled individuals belong to multiple minority groups. Therefore, in order to capture the entirety of a victim experience, it is important officers do not assume that one element of identity is dominant over others and to consider the multiple identities involved (Healy, J, 2019) [Thinking outside the box: intersectionality as a hate crime research framework](#).

The supporting procedure will ensure that officers take an intersectional approach when working with victims, providing targeted support and resources, recognizing their unique needs and experiences. The procedure will also highlight that someone can be a victim of **more than one** type of hate crime and the impact of this.

Often people with substance misuse issues, unemployed people, ex-offenders and people with certain mental health needs are disproportionately represented in the perpetrator group, and therefore more likely to be targeted with formal intervention processes (see also Hambly, JR., Singh, S. & Wedlake-James, T., [Hate Crime: a thematic review of current evidence, Home Office 2018](#)). Therefore, the policy could be seen as having adverse impacts on groups more likely to perpetrate anti-social behaviour – however this is justifiable as the purpose of the policy is to intervene and prevent further hate incidents. The policy promotes positive intervention, working with partner agencies to address any support unmet needs, rather than immediate enforcement action. This includes referring cases to HASBRAC, the monthly Hate & ASB Risk Assessment conference, which addresses the harm caused to victims of hate incidents and crimes through supportive interventions and management of behaviour of priority and repeat perpetrators. Perpetrators will be offered appropriate interventions to address their behaviour and enforcement will be used when necessary. Cases that go to court must have been carefully evaluated by completing a proportionality assessment. This ensures that due regard is given to the Equalities Act when enforcement action is taken. A copy of this assessment is attached as Appendix 2.

Recognising that language and literacy barriers may prevent some people from accessing the service. The procedure will ensure all officers are aware how to obtain translation and interpretation services, whilst raising awareness of literacy barriers and promote the use of alternatives.

The service is process driven and involves formal action with high evidential requirements. Members of some groups may be less likely to engage because of inability to communicate on a formal basis and/or negative perception of statutory agencies. As a result, the supporting procedure will highlight the need for officers to assess communication ability and provide alternatives and/or support where required.

There is a lack of comprehensive data on certain groups, including expatriates, migrants, asylum seekers, refugees, care leavers, sex workers, people with experience of or living with addiction and/ or a substance use disorder, lone parents and young adults with intersections. Data is also not available to carry out detailed analysis on how multiple characteristics interact to create unique vulnerabilities and the resulting intersectional impacts, such as how race and disability might affect someone's experience of hate incidents.

## 7. Action planning

**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)

### Activity 1:

**Specific: Improve data collection methods to capture detailed demographic information for Housing.**

**Measurable: 75% of people involved in hate incident cases to have their equalities strand data recorded on NEC.**

**Achievable: Procedure in place prompting officers to ensure that equalities data is updated on NEC following each risk assessment. Briefings to staff on importance of gathering data during tenancy visits. Exploring proposal to expand person fields on NEC. This will also be supported by the Year 2 (2025/26) action plan for the Housing Strategy to implement improvements to the collection and analysis of equalities data.**

Relevant: Ensure data informs policy decisions.

Time-bound: Complete data collection improvements within one year.

### Activity 2:

Specific: Introduce **senior oversight role for all hate incident cases to improve case handling.**

Measurable: All case records to include: 1) completed risk assessment (including consideration of external factors increasing risk) 2) a tailor-made action plan including preferred communication method & agreed frequency of contact, 3) offer of referrals to appropriate support for both victims & perpetrators, 4) use of template letters as appropriate, 5) referral to multi-agency forums, e.g. HASBRAC, as appropriate, 6) completion of proportionality assessment where enforcement action is being taken.

Achievable: Manager with senior oversight responsibility to monitor all active hate incident cases and review outcomes of cases on an annual basis.

Relevant: Ensure hate incident cases are actively managed taking a victim centred approach, with regard for the potentially disproportionate impact on persons with protected characteristics.

Time-bound: Implement within first three months of policy.

### Activity 3:

Specific: Provide **hate incident training to frontline staff within Housing, including proportionality, mental health and a module on intersectionality and its effects.**

Measurable: Track attendance and feedback from training sessions.

Achievable: Collaborate with Learning Development Team, Community Safety & Equalities Teams to create training modules. Senior oversight role to have ongoing responsibility to identify future training needs and co-ordinate training.

Relevant: Ensure training addresses the unique needs of intersecting characteristics.

Time-bound: Implement training within first six months of policy.

### Activity 4:

Specific: **Review implementation of the new policy.**

Measurable: Review 1) satisfaction surveys, 2) review complaints & identify areas of key learning, 3) case outcomes – checking communication preferences have been taking into consideration & referrals offered, 4) Success of training and identify any gaps, 5) Identify trends (case type & location), 6) Seek feedback from key agencies e.g. Victim Support

Achievable: To be completed alongside manager with senior oversight responsibility during their first annual review.

Relevant: To ensure the policy is implemented in a fair way, any negative impacts on groups with protected characteristics are understood and any necessary amendments are identified (e.g. further training for staff).

Time-bound: After first year of implementation.

### Activity 5:

Specific: **Improve access to service.**

Measurable: 1) enabling third party reporting 2) supporting advocacy 3) alternative formats (easy read, large print, SMS text messaging & WhatsApp, translation services) 4) procedure to ensuring any service adjustments recorded on RA2 support plan (e.g. large print letters, document translation).

Achievable: Supporting procedure to ensure officers implement the above adjustments and senior oversight role to monitor adjustments recorded on RA2 support plan.



**Relevant:** To ensure that a variety of options are available to ensure that all persons harmed by hate are able to report hate incidents.

**Time-bound:** Implement within first three months of policy.

### Which action plans will the identified actions be transferred to?

- For example: Team or Service Plan, Local Implementation Plan, a project plan related to this EIA, 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.

The above monitoring will be included in the Fair and Inclusive Action Plan reporting and auditing for Tenancy Services and Temporary Accommodation, which is monitored by the Directory Equality Delivery Group.

## 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>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.	<b>X</b>

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

More learning needed to understand the mitigations needed for intersectional identities, which as a result may increase any disproportionate impacts.

### 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 new hate incident policy for Housing.

The policy defines how Housing will manage [hate incidents](#) experienced by residents who live in or regularly visit areas where we own/manage Housing. This includes all protected characteristics and intersecting groups as set out in the council's Equality Impact Assessment (EIA) Toolkit 2023. The EIA identifies several factors relating to protected characteristics and their intersections which impact how residents affected by hate incidents may access support from Housing.

The policy aims are not expected to adversely affect any protected characteristic. The policy is expected to have a positive impact on all protected groups through the provision of a robust and consistent approach that is victim-centred, considering the needs and vulnerabilities of those experiencing and perpetrating Hate Incidents.

Five actions have been identified to address potential disproportionate and cumulative impacts identified within the EIA:

1. Improve data collection methods to capture detailed demographic information for Housing.
2. Introduce senior oversight role for all hate incident cases to improve case handling.
3. Provide hate incident training to frontline staff within Housing, including proportionality, mental health and a module on intersectionality and its effects.
4. Review implementation of the new policy.
5. Improve access to service.

## 9. Publication

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

If the EIA is published, some of the protected characteristic data will need to be hidden with \* to avoid identifying tenants as the data sets are so small.

## 10. Directorate and Service Approval

Signatory:	Name and Job Title:	Date: DD-MMM-YY
Responsible Lead Officer:	Justine Harris, Head of Tenancy Services	
Accountable Manager:	Justine Harris, Director of Housing & People Services – Tenancy Services	

**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 sign-off](#)

**EIA Reference number assigned: DIRNAME##-DD-MMM-YY-EIA-Name**

For example, HNC##-25-Dec-23-EIA-Home-Energy-Saving-Landlord-Scheme

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.

<b>Signatory:</b>	<b>Name:</b>	<b>Date: DD-MMM-YY</b>
<b>EDI Business Partner:</b>	Eric Page	04-April-25
<b>EDI Manager:</b>	Sabah Holmes	04-Apr-25
<b>Head of Communities, Equality, and Third Sector (CETS) Service:</b> <i>(For Budget EIAs/ in absence of EDI Manager/ as final approver)</i>	Not in post – EDI approval sufficient.	

**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:**

