

Committee Name and Date of Committee Meeting

Cabinet – 18 November 2024

Report Title

Temporary Accommodation Policy

Is this a Key Decision and has it been included on the Forward Plan?

Yes

Strategic Director Approving Submission of the Report

Ian Spicer, Strategic Director of Adult Care, Housing and Public Health

Report Author(s)

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Ward(s) Affected

Borough-Wide

Report Summary

The report seeks Cabinet approval of a new Temporary Accommodation Placement Policy (Appendix 1). The report sets out the objectives and principles that are reflected in the Policy and explains how the Council intends to meet its statutory obligations under the Housing Act 1996 and The Homeless (Suitability of Accommodation) Order 2012, in line with the Homelessness Code of Guidance for Local Authorities and the objectives and principles of Rotherham's Homelessness and Rough Sleeping Strategy.

The report also provides Cabinet with an update on the growing demand for temporary accommodation and the work being undertaken by the Council to improve outcomes for residents and reduce the impact on the Council's financial position. The report requests a specific, time-limited delegation to expand the Council's temporary accommodation portfolio to meet demands.

Recommendations

That Cabinet:

1. Note the increase in homelessness and growing demand for temporary accommodation and the work being undertaken by the Council to respond to this demand.

2. Approve the adoption of the new Temporary Accommodation Placement Policy (Appendix 1).
3. Delegate authority to the Strategic Director of Adult Care, Housing and Public Health for a 3-year period in consultation with the Cabinet Member for Housing, to make operational amendments to the Policy when the need is identified.
4. Note officers' intention to continue to pursue opportunities for a 3-year period to increase the portfolio of Council-owned temporary accommodation to meet service demands, subject to available budget and in consultation with the Cabinet Member for Housing.

List of Appendices Included

Appendix 1 Temporary Accommodation Placement Policy 2024
Appendix 2 Equality Impact Assessment - Part A and Part B
Appendix 3 Carbon Impact Assessment

Background Papers

Rotherham's Homelessness and Prevention Rough Sleepers Strategy 2023 -2026
Households in Temporary Accommodation (England) Commons Library Research and Briefing Report Jan 2023

Consideration by any other Council Committee, Scrutiny or Advisory Panel
None

Council Approval Required
No

Exempt from the Press and Public
No

Temporary Accommodation Policy

1. Background

- 1.1 Housing plays a vital role in supporting residents to achieve and maintain the life they want to lead, and good quality, secure and affordable homes support positive health, educational and economic outcomes. Recognising this, the Council's Homelessness and Prevention Rough Sleeper Strategy 2023-2026 sets out the Council's aim to prioritise homelessness prevention.
- 1.2 National rates of homelessness and use of temporary accommodation are currently the highest on record. According to national housing charity Shelter, 112,660 households were homeless and living in temporary accommodation at the end of 2023, a record high figure and up 12% in a year. In the same year, 317,430 households were accepted as either homeless or at imminent risk of it by their local authority, the highest number since records began, and up 9% on the previous year.
- 1.3 Rotherham is not immune to these national trends. The Council has experienced significant increases in demands for homelessness services over the last few years. In the financial year 2022/23, 1,409 homelessness applications were received. During the same period, there were 771 placements into hotel/bed and breakfast temporary accommodation. In 2023/24 the number of homelessness applications increased by 7.9% to 1,521, while the number of placements increased by 29% to 995. The placement of families with children also increased in 2023/24: 258 families with children were placed in hotel/bed and breakfast accommodation, a 14.2% increase from 2022/23. It should be noted that some households may have been placed more than once.
- 1.4 As well as an increase in the total number of placements, from 771 in 2022/2023 to 995 in 2023/2024, the average length of stay in temporary accommodation is also increasing. In 2023/24, the average length of stay in hotels/bed and breakfast was 36 days, while in self-contained furnished temporary accommodation the average stay was 112 days for singles, couples and families. There is a legal limit of six weeks for families placed in hotel / bed and breakfast accommodation, which the Council has not breached.
- 1.5 The table below provides a breakdown on the numbers of households living in different types of temporary accommodation at the end of March 2023 and at the end of March 2024.

	End of March 2023	End of March 2024
RMBC-owned dispersed properties	80	100
Hotels/B&B	50	74
Privately owned furnished TA (nightly charged)	10	1
Total	140	175

- 1.6 These significant increases in demand have led to gross expenditure on hotels and private nightly charged temporary accommodation more than doubling between 2020/21 and 2023/24. In the last financial year, the Council spent £1,742,252 on this sort of accommodation.
- 1.7 Many of the factors driving these outcomes relate to national policy – including how the private rented sector is regulated, and the benefits system – and housing market factors. The Council is also seeking to improve its services to manage pressures locally, with three aims:
- Reducing the flow into temporary accommodation through improving prevention and early intervention outcomes and strengthening the quality of casework and statutory decision making.
 - Improving the size, quality and cost effectiveness of the Council's temporary accommodation portfolio.
 - Increasing the flow out of temporary accommodation through enhancing the Council's settled accommodation options for homeless households.
- 1.8 This report focuses on the Council's approach to managing its temporary accommodation service including decision-making, risk management and safeguarding, housing management, support and quality standards.

2. Key Issues

- 2.1 The Council is proposing to adopt a Temporary Accommodation Placement Policy owing to the significant increase in the number of placements being made. Although the adoption of such a policy is not in itself mandatory, there are legal and regulatory standards for performance and compliance regarding temporary accommodation placements that must be observed. The proposed new Policy will formalise some of the extensive work that is already undertaken by the Housing Options Service in assisting those households who are homeless and eligible under the Housing Act 1996 for assistance and in need of temporary accommodation.
- 2.2 The Policy aims to:
- Set out the Council's approach to placing homeless households in emergency and temporary accommodation.
 - Ensure the Council is compliant with legislation, guidance, case law, and good practice relating to the provision of temporary accommodation.
 - Set out the factors that will be considered to make sure that the temporary accommodation being offered is suitable and allocated fairly.
 - Keep households that are homeless safe and supported, including those who are homeless because of domestic abuse.
 - Monitor demand and if required use opportunities that become available to increase the number of temporary accommodation units in Rotherham that are of suitable quality and are affordable.
 - Set out how the Council will provide a good quality temporary accommodation service.
 - Ensure the effective management of temporary accommodation premises.

- Outline how the Council supports households who approach the Council in need of temporary accommodation, to ensure they are treated in a consistent manner and with empathy and respect.
- Improve customer satisfaction with the temporary accommodation service.
- Keep the cost of the Council's temporary accommodation to a minimum by reducing the use of hotels and bed and breakfast accommodation.

2.3 The Council is committed to ensuring that its temporary accommodation portfolio is large enough to meet the overall level of need, and that it contains the right kinds of accommodation to ensure individual needs can be met. However, in practice the availability of suitable accommodation is extremely limited, which is why like many local authorities the Council has made extensive use of hotel/bed and breakfast establishments in recent years. Because of the mismatch between supply and demand, clear policy is needed on how decisions to place households are made.

2.4 The proposed new Temporary Accommodation Placement Policy is contained in Appendix 1. The main features of the Policy are outlined in this report.

Temporary accommodation portfolio

2.5 The Policy explains that the Council owns or commissions a portfolio of temporary accommodation that has grown in size over the last few years. The most recent expansion entailed utilising Local Authority Housing Fund (LAHF) funding to secure an additional 16 dispersed properties, bringing the total to 144 properties (this includes 13 ringfenced for victims of domestic abuse).

2.6 Accommodation that is owned and managed, or directly commissioned by the Council, is generally the best quality and most cost-effective form of temporary accommodation available. The Council is continually reviewing the size and effectiveness of the portfolio with a view to pursuing further expansion. This may include non-self-contained supported temporary accommodation as well as dispersed self-contained properties.

Suitability of temporary accommodation

2.7 The Policy provides a clear and consistent approach to assessing households for temporary accommodation in line with statutory requirements to ensure suitability. As far as reasonably practicable, the Council will secure accommodation in the Rotherham area. Where this is not possible, the Council will make all efforts to place homeless households as close as possible to Rotherham and prioritise households with the highest need back into Rotherham at the earliest opportunity.

2.8 The Policy sets out the factors that the Council must consider when determining whether temporary accommodation is suitable for a household, taking into account the location and other factors such as:

- The significance of any disruption that would be caused by the location of the accommodation to the employment, caring responsibilities, or education of the person or members of the person's household.

- The proximity and accessibility of the accommodation to medical facilities and other support that is currently used by or provided to the person or members of the person's household that are essential to the wellbeing of the person or members of the person's household.
- The proximity and accessibility of the accommodation to local services, amenities, and transport.

- 2.9 The Policy reaffirms that hotels or bed and breakfast accommodation is not to be regarded as suitable for 16- and 17-year-olds. The Policy refers to the joint working protocol between Children's Services and Housing for homeless 16- and 17-year-olds and how the Council will approach assessment of needs.
- 2.10 The Policy explains that while families can be placed in hotels or bed and breakfasts when there are no other options available, the Council will adhere to the Homelessness (Suitability of Accommodation) (England) Order 2003 by ensuring that no household with family commitments stays in this type of temporary accommodation beyond 6 weeks for each single homeless application made. There is a commitment that the Council will aim to move families out of hotels or bed and breakfast at the earliest opportunity.
- 2.11 The Practice Guidance for Temporary Accommodation Placements document which sits within the policy document expands upon the approach that should be taken by officers when determining the suitability of a placement, including any associated risks, timely reviews, and robust monitoring.
- 2.12 The Policy sets out how the Council will consider potential risks associated with placing multiple vulnerable households in one location. The Practice Guidance for Risk Assessing and Managing the Impact of Hotel and Bed and Breakfast Placements (Appendix 1 - Part B of the Policy) expands upon the approach that will be taken by officers in the effective management of hotel and bed and breakfast placements within communities.

Food and cooking facilities

- 2.13 The Council has no statutory obligation to provide or pay for the provision of food or to provide cooking facilities. Cooking facilities are provided in all Council-owned dispersed temporary accommodation properties but are generally not available in hotels or bed and breakfast accommodation. Some Councils have stopped paying for breakfast for hotel placements and only provide accommodation as a way of addressing the financial pressures due to the increasing demand of temporary accommodation. The Policy proposes that the Council continue the practice of offering breakfast where it is available for hotel placements. The Policy also emphasises partnership working between the Council and voluntary and community sector organisations who may be in a position to assist homeless households with access to cooked meals.

Offers, refusals and right to review

- 2.14 The Council always aims to offer suitable accommodation to the household at the first time of offer. The Policy explains that households who have any reservations about the suitability of accommodation being offered should

initially discuss the matter with the officer managing their homeless application. It also explains that the suitability of accommodation provided in performance of the 'main housing duty' is subject to a statutory right to review, and that the consequences of refusing a suitable offer could be that the Council may not owe any duty to provide further accommodation.

Households with pets

- 2.15 Many households that experience homelessness rely on their pets for emotional support and safety. However, when requesting assistance with temporary accommodation, pet owners often have to choose between rehoming their pet with friends or family or placing their pet in a kennel or a cattery.
- 2.16 In the Homelessness Code of Guidance, local authorities are asked to be sensitive to the importance of pets to some applicants, who may rely on them for companionship. Although the Code of Guidance recognises that it will not always be possible to make provision for pets, it is recommended that local authorities give careful consideration to this aspect when making provision for households that wish to retain their pet.
- 2.17 During engagement to support the development of this Policy, some customers voiced the importance of their pets and the upset it has caused them not having their pet with them. As a result of this, the Policy proposes that the Council provides a more flexible and sensitive approach to individuals who are pet owners who find themselves homeless and in need of temporary accommodation. Although there is no guarantee suitable temporary accommodation will be available, each case will be considered on its merits and where permission is granted, certain conditions will apply that will be linked to the household licence agreement. This is a shift from the current approach which entails a near blanket prohibition of pets in temporary accommodation owned by the Council.
- 2.18 The Households with Pets Practice Guidance (Appendix 3 – Part D) to the Policy, which sits within the policy document expands upon the proposed approach that the Council will take when considering granting permission.

Support and resettlement

- 2.19 Between March and June 2023, a needs analysis was undertaken which identified that approximately 40-50% of people in temporary or emergency accommodation had recognised support needs that relate to their ability to live independently and sustain a tenancy. During engagement to support the development of this policy, customers voiced the importance of receiving good support and having access to the right information and knowing who to contact in the Council.
- 2.20 The Policy sets out how the Council will ensure that support is available to households throughout their stay in temporary accommodation, which will help households achieve a prompt and successful move into a more permanent home and achieve the outcomes agreed in their Personal Housing Plan. All households will be allocated a named officer, and the Council is in the process

of commissioning a specialist service to provide more intensive move-on support specifically for single people and families that are in temporary and emergency accommodation.

2.21 Examples of support that will be offered include:

- Support in understanding rights and responsibilities whilst in temporary accommodation.
- Help in applying for benefits.
- School admissions being addressed, to get children into school swiftly, minimising educational disruption.
- Links established with other agencies where needed e.g., Social Care, Children's Services, Domestic Abuse Services and Drug and Alcohol support.
- Support to register with Health Care, which includes linking in with Gateway Primary Care, which specialises with hard to reach and vulnerable groups.
- Earlier conversations regarding housing options and support to join the Council's housing register.

Temporary accommodation service standards

2.22 The Council is committed to providing a high-quality temporary accommodation service. To support this, the Policy introduces a set of proposed service standards (Appendix 1 – Part C within the policy document) influenced by engagement with Council staff, customers with lived experience and external partners. Customers voiced that when living in temporary accommodation, it was important that they felt safe and secure and were being listened to, with empathy and understanding. This is reflected in the standards.

2.23 The Service Standards focus on customer services, physical standards, service management and support and represent a level of quality which council officers will work from. The standards will enable customers to understand what level of service they should expect from the service.

Management of temporary accommodation including ending placements

2.24 The Policy includes the actions that the Council will take in relation to breaches of temporary accommodation agreements or where households are believed not to be using their temporary accommodation. This ensures a consistent and fair approach for all households in temporary accommodation and is compliant with relevant legislation. The Policy also commits to the service to developing local operational procedures to work alongside the Policy.

2.25 The Policy also sets out the range of reasons why the Council may discharge its duties to accommodate in line with legislation.

Safeguarding

2.26 This Policy makes an explicit link between homeless households in need of temporary accommodation and safeguarding in respect of children, young people, and vulnerable adults placed into temporary accommodation. In particular, the Policy includes the factors the Council must take into account

when determining the suitability of accommodation secured under the Housing Act 1996 as set out in the Homelessness Code of Guidance.

- 2.27 The Policy states how the service will take ownership of its safeguarding responsibilities for children, young people and adults taking appropriate action when required to ensure children, young people and adults are protected in line with corporate safeguarding policies. The Policy emphasises the importance of managing safeguarding risks, both to homeless individuals and others they may come into contact with, through strong multi agency working practice. The Assistant Director of Housing will continue to attend the Rotherham Safeguarding Adults Board as a full member.

3. Options considered and recommended proposal

- 3.1 It is recommended that the Policy is approved by Cabinet to help ensure that the Council is compliant with legislation, guidance, case law, and good practice relating to the provision of temporary accommodation.
- 3.2 An alternative option would be to continue without a comprehensive policy. This approach could deliver some of the benefits outlined in this report, but not to the same extent or degree. There is a risk that homeless households, other residents and professionals would not have a clear understanding of how decisions to accommodate households are made and how temporary accommodation is managed.

4. Consultation on proposal

- 4.1 The development of the Policy has benefited from the insights of Council and external stakeholders, including voluntary sector agencies, primary health care, adult and children's social care, housing, and customers. Consultation and engagement activities were completed between 1st March 2024 to 31st May 2024.
- 4.2 A range of customer engagement activities were undertaken to gather views from a diverse range of people who have lived experience in accessing temporary accommodation. Customer engagement and engagement activities included:
- Home visits to households currently living in temporary accommodation.
 - A telephone survey undertaken with households who had experience of living in temporary accommodation.
 - Housing support providers gathered the views from their own customers.
 - Drop-in sessions were held at Shiloh, a homelessness charity, where customers had the opportunity to express themselves on what was important to them in relation to temporary accommodation.
- 4.3 The voice of our customers has been pivotal in influencing and shaping the Policy. Feedback has included the following:

"Pets are important and help me through difficult times, they are my therapy".

“Hotels need to be the last resort, having no cooking facilities in hotels can be a real struggle”.

“Service standards needs to have a good level of furniture, decent decoration, I need to feel safe and secure”.

“As a victim of domestic abuse, it was important to have somewhere I could feel safe and clean for my children”.

“It’s important to receive good support, consideration needs to be given to each individual’s situation. I needed help to register with a GP and sort out my benefits”.

- 4.4 In addition to gathering the views of people with lived experience, officers consulted members of the Housing Involvement Panel, the Strategic Homelessness Board, and the Rotherham Safeguarding Adults Board.

5. Timetable and Accountability for Implementing this Decision

- 5.1 The Assistant Director of Housing will have responsibility for implementing the Policy. It is proposed that the new Policy is introduced on 18th January 2025 following the Cabinet decision which will allow a 2-month implementation period. An implementation plan will support the launch of the new policy to ensure that teams are fully informed of any changes to their current practice, identify any training and development needs and ensure operational procedures are aligned with the new Policy.
- 5.2 The Service is committed to continuous improvement and will ensure there is a focus on quality assurance and performance monitoring. The Council will use performance reports and data to proactively understand demand, effectiveness and the outcomes achieved by the temporary accommodation service.
- 5.3 The Policy will be fully reviewed every three years by Cabinet or sooner by the Strategic Director of Adult Care, Housing and Public Health if required.

6. Financial and Procurement Advice and Implications

- 6.1 There are no direct financial implications arising from the recommendations in this report. Activity associated with the new Policy will be contained within existing budget provision. It is anticipated that no additional resource or savings will result from the implementation of the new Policy.
- 6.2 There are no direct procurement implications arising from the recommendations within this report.
- 6.3 The procurement of the housing related support service for single people and families that are in temporary and emergency accommodation referred within the report is being conducted via the Council’s Housing Related Support: Flexible Purchasing System, in compliance the Council’s Financial and Procurement Procedure Rules and Public Contract Regulations (as amended).

- 6.4 Any new procurement activity to be developed to respond to temporary accommodation requirements will be procured in line with the Council's Financial and Procurement Procedure Rules and Public Contract Regulations (as amended) or the subsequent Procurement Act.

7. Legal Advice and Implications

- 7.1 The adoption of a Temporary Accommodation Placement Policy is not a mandatory requirement. However, in *Nzolameso vs Westminster City Council [2015]*, the Supreme Court recommended Local Authorities produce and keep up to date a publicly available policy for the procurement and allocating of temporary accommodation units, that could be used to explain the individual factors that have been taken into account when offering such accommodation to households.
- 7.2 The legislative framework and guidance relating to the allocation of temporary accommodation can be found in the body of the report. Legal Services have consulted on and reviewed the Policy to ensure no aspects of the Policy are deemed unlawful.
- 7.3 Implementation of the Temporary Accommodation Placement Policy will allow for a transparent and consistent approach to the provision of the growing demand for temporary accommodation.
- 7.4 A failure to implement the Temporary Accommodation Placement Policy could result in complaints about the allocation of temporary accommodation and the decision-making process and result in local criticism/reputational damage and/or the utilisation of time consuming and resource draining internal review/appeal processes. If matters cannot be resolved internally, they may be escalated to the Local Government and Social Care Ombudsman, which may result in an award of compensation. A decision not to implement the Policy could also lead to legal challenge by way of Judicial Review. If it is implemented, it is vital that the Policy is adhered to as failure to do so poses the same risk in relation to legal challenge.

8. Human Resources Advice and Implications

- 8.1 There are no HR related concerns.

9. Implications for Children and Young People and Vulnerable Adults

- 9.1 Children and Young Peoples Services (CPYS) have been consulted on the Temporary Accommodation Placement Policy. All households who have identified vulnerabilities or safeguarding concerns have been considered as appropriate. Children and young people will be appropriately managed and provided with support.

10. Equalities and Human Rights Advice and Implications

- 10.1 Data and consultation have been used to understand Rotherham's homeless households needs in relation to temporary accommodation placements. An Equality Impact Assessment has been carried out for this Policy. The Policy

sets out consideration for households with certain protected characteristics in relation to the suitability of a temporary accommodation placement. This includes households with children or who are pregnant should not be in a hotel/bed and breakfast placement longer than 6 weeks. Consideration includes households that have health factors, or a disability, or care and support needs, or the need to access any specialist medical services that are only available in Rotherham.

- 10.2 There is no identified negative impact through the implementation of this Policy. The Policy recognises the diverse needs of homeless households and is inclusive to all people with protected characteristics who are eligible for assistance under the Housing Act 1996. The Policy makes a commitment to providing a consistent and fair approach to the assessment and factors considered when making a suitable placement of temporary accommodation.
- 10.3 The Temporary Accommodation Placement Policy recognises the importance of creating an inclusive and supportive service that will cultivate empathy and compassion towards individual needs.
- 10.4 An implementation plan for the launch of the new Policy will ensure information is accessible both online and a customer easy read temporary accommodation leaflet is developed which will explain key elements of the Policy.
- 10.5 The Council makes efforts to ensure that the temporary accommodation portfolio meets the diverse needs of residents in Rotherham. The Council reviews needs and demand regularly to ensure that there is sufficient and suitable temporary accommodation available to meet the expected need. To assist with this the Council will collate and monitor and review equality data to identify trends and improve service delivery.

11. Implications for CO2 Emissions and Climate Change

- 11.1 Climate change poses a significant threat to environments, individuals, communities, and economies on a local, national, and international scale.
- 11.2 It is the Council's aim to be net carbon neutral as an organisation by 2030, and for Rotherham as a whole to achieve the same position by 2040. It is acknowledged that emissions will be difficult to calculate. The Council will be mindful of energy efficiency measures present in the delivery of the temporary accommodation service and identify any improvements required including the development of future temporary accommodation through its own delivery programme.
- 11.3 Other areas for consideration will include:
 - Transportation - Staff travel, effective planning, and geographical casework to minimise unnecessary travel.
 - Employee Engagement – Educate and engage with staff teams on sustainability practices and encourage them to contribute towards reducing emissions in the workplace.
 - Waste Reduction (furniture/whitegoods) – ensure the use of recycling to minimise waste sent to landfills.

- Supply Chain – Considered when using external suppliers, using local suppliers to reduce transportation.

11.4 Anticipated implications for CO2 Emissions and Climate Change are detailed in the Carbon Impact Assessment (Appendix 3).

12. Implications for Partners

12.1 While the Policy is focused on the Council’s statutory role, a partnership approach is key to achieving positive outcomes for homeless households. Many of the key partners have been consulted and engaged in the preparation of the Policy.

12.2 The Policy will provide a clearer pathway to temporary accommodation, providing clear guidance and information for all internal and external partners as well as internal officers. This Policy is aligned with the partnership approach which is embedded within the Council’s Homelessness Prevention and Rough Sleeper Strategy 2023-2026.

13. Risks and Mitigation

13.1 The Policy is intended to set a compliant standard for homelessness services and duties in regards of temporary accommodation. Failure to meet the Council’s statutory duties can result in potential legal consequences and judicial review along with investigation by the Local Government and Social Care Ombudsman. The adoption and implementation of the Policy is aimed at minimising the risks of non-compliance.

13.2 A summary of risks and mitigation is provided in the table below:

Risk Identified	Overall Risk	Risk Management – Mitigations
<p>1. The risk of the Temporary Accommodation Placement Policy not adequately communicated leading to incorrect application of the Policy:</p> <ul style="list-style-type: none"> • Financial loss • Reputational damage on individual cases 	Low	<ul style="list-style-type: none"> • The correct staff resources and processes are in place, and through regular and robust progress monitoring. • Local operational procedures will be reviewed and aligned with the new Policy. • Training will be given to officers in regard to the new Policy. • The Policy will be published on the Council’s website. • A customer’s easy read leaflet on the key areas of the Policy will be developed.

<p>2. The risk of the Temporary Accommodation Placement Policy becoming out of date due to policy and context changes at the national and local level:</p> <ul style="list-style-type: none"> • Financial loss • Reputational damage on individual cases 	<p>Low</p>	<ul style="list-style-type: none"> • Reviewing the Temporary Accommodation Placement Policy every three years. • Monitoring of any legislative changes or significant changes to local demand and need. • Making any minor changes to the Policy or any changes to the practice guidance notes, through delegated powers to the Assistant Director of Housing in consultation with the Cabinet Member following the approval of this approach outlined in this report.
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14. Accountable Officer

14.1 Assistant Director of Housing

Approvals obtained on behalf of Statutory Officers: -

	Named Officer	Date
Chief Executive	Sharon Kemp OBE	04/11/24
Strategic Director of Finance & Customer Services (S.151 Officer)	Judith Badger	21/10/24
Assistant Director, Legal Services (Monitoring Officer)	Phil Horsfield	16/10/24

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