

Customer Access Review – Full Assessment

Assessment details	
Assessment area	Temporary Accommodation Charging Policy
Date of assessment	August 2025
Directorate and Service	Housing & Public Protection, Housing Services
Manager	Housing Scheme and Finance Manager / Housing Solutions and Private Sector Manager
Officer conducting assessment	Senior Housing Policy & Performance Officer
Step 1: Scoping the assessment	
1. What are the aims and objectives of the activity or proposal?	Dartford Borough Council makes use of various types of temporary accommodation for homeless households in the borough, including nightly paid, Dartford Private Leasing Scheme (DPLS) and Council owned temporary accommodation. The Temporary Accommodation Charging Policy is a new policy that outlines the Council's approach to charging homeless households for the provision of temporary accommodation. This assessment has been undertaken in conjunction with the development of the policy. The overall aim of the policy is to provide a consistent, transparent and proportionate approach towards charging for temporary accommodation. The objectives of the policy are to ensure that charges for temporary accommodation: • Are affordable to all; • Contribute towards meeting the operational costs of temporary accommodation provision or as much as reasonably can; • Do not act as a disincentive for households to work; • Are fair charges to those who can afford to pay; and • Are in line with housing benefit subsidy rules. The Temporary Accommodation Policy supports the Equality Act 2010 aim to ensure there is no unlawful discrimination in the application of charges for the provision of temporary accommodation.
2. Who will be affected by the activity or proposal?	The policy will affect all homeless households placed in temporary accommodation within the Dartford Borough.
3. How does the activity or proposal contribute to:	a) The Temporary Accommodation Charging Policy contributes to the following key performance indicators: • Number of households living in temporary accommodation • Number of households in Dartford Private Sector Leasing Scheme (DPLS) accommodation

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Step 1: Scoping the assessment	
a) any key performance indicators? b) policies, values or objectives of Dartford Borough Council?	b) The Temporary Accommodation Charging Policy contributes to the Corporate Plan housing ambition to relieve homelessness in our town, work to eradicate the causes of it and end rough sleeping.
4. Which aspects of the activity or proposal are dictated by legislation/regulation and where do we have discretion in how they are delivered?	The Temporary Accommodation Charging Policy and its delivery is intended to be compatible with the Council's obligations consequent to all relevant legislation and statutory guidance, but not limited to the Housing Act 1996; Homelessness Act 2002; Homelessness Reduction Act 2017; Homelessness Code of Guidance for Local Authorities 2018; and Equality Act 2010. The Council has a duty to work with people who are threatened with homelessness to help prevent them from becoming homeless ('the prevention duty'). Where a person is already homeless, the Council must take reasonable steps to help the person secure accommodation for at least six months ('the relief duty'). During the homeless application process, the Council has a duty to provide interim accommodation to applicants during the relief stage if there is reason to believe that the applicant may be homeless, eligible for assistance, and have a priority need (s188 of the Housing Act 1996). Interim accommodation is that which is provided when the Council is still making its enquiries in order to satisfy itself of the longer term duties. If following enquiries the Council is satisfied that the applicant is eligible for assistance, in priority need, and unintentionally homeless; then the 'main housing duty' is owed (s193 of the Housing Act 1996). The Council is required to provide temporary accommodation until the applicant's housing can be suitably resolved by a final offer of accommodation and the homelessness duties discharged. The Council has the right to make a reasonable charge to homeless households as a contribution towards interim and temporary accommodation costs (s206(2) of the Housing Act 1996). When setting the charge for the accommodation, it is fixed in line with the government's subsidy rules. For nightly paid and Dartford Private Leasing Scheme (DPLS) temporary accommodation, the maximum subsidy is 90% of the January 2011 Local Housing Allowance (LHA) rates for the size and area of the property. For Council owned temporary accommodation, the maximum subsidy is based on current LHA rates for the size of the property. The Temporary Accommodation Policy does use discretion in applying a £10 weekly personal charge to households placed in nightly paid accommodation (see question 11 for more information).

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5. What do you know about the groups of people who will be affected? (i.e. demographic information in relation to the protected characteristic groups of age, disability, pregnancy and maternity, religion or belief, race, sex, sexual orientation, gender reassignment, marriage and civil partnership)	<u>POPULATION PROFILE – DARTFORD</u> (Source: 2023 Mid-Year Population Estimates and 2021 Census, Office for National Statistics) • Population – Dartford’s population is 120,700. • Sex – There are more female residents than male residents in Dartford with 51.2% females to 48.8% males. • Age – The mean age in Dartford is 37.4 years, which is lower than the overall Kent mean age of 41.7 years. • Ethnicity – The largest ethnic group that people in Dartford identify with is White at 74.5%. This is followed by Black, Black British, Black Welsh, Caribbean or African (10.5%), Asian, Asian British or Asian Welsh (9.9%), Mixed or multiple ethnic groups (3.1%), and Other ethnic groups (2.0%). • Disability – 14.0% of Dartford population are disabled. Of this, 8.3% of people’s activities are limited a lot and 5.7% of people’s activities are limited a little. • Religion or belief – 48.1% of Dartford’s population connect or identify with the Christian religion, followed by 3.8% Hindu, 3.5% Muslim, 1.7% Sikh, 0.6% Buddhist, 0.1% Jewish, and 0.4% other religion. 36.5% of Dartford’s population did not connect or identify with any religion and 5.3% did not answer this question in the Census. • Sexual orientation – 91.2% of Dartford’s population aged 16 years and over identified as straight or heterosexual. 1.2% described themselves as gay or lesbian. 0.9% described themselves as bisexual, and 0.2% described themselves as other sexual orientations. 6.5% did not answer this question in the Census. • Gender reassignment – 94.3% of Dartford’s population aged 16 years and over identified their gender identity as the same sex as registered at birth. 0.2% of Dartford’s population identified their gender identity as different from the sex they were registered at birth.

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PROFILE OF HOMELESS APPLICANTS

(Source: Homelessness Case Level Information Collection (HCLIC))

Age of main applicants owed a prevention or relief duty (Quarter 4 2024-25)

16-17	0	0.0%
18-24	33	20.5%
25-34	45	28.0%
35-44	38	23.6%
45-54	27	16.8%
55-64	11	6.8%
65-74	4	2.5%
75+	3	1.9%
Total	0	0.0%

Ethnicity of main applicants owed a prevention or relief duty (Quarter 4 2024-25)

White	76	47.2%
Black / African / Caribbean / Black British	15	9.3%
Asian / Asian British	10	6.2%
Mixed / Multiple ethnic groups	5	3.1%
Other ethnic groups	1	0.6%
Not known	54	33.5%
Total	161	100%

Sexual identification of main applicants owed a prevention or relief duty (Quarter 4 2024-25)

Heterosexual	866	53.4%
Homosexual (Gay/Lesbian)	2	1.2%
Bisexual	1	0.6%
Other	1	0.6%
Prefer not to say	71	44.1%
Total	161	100.0%

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	Employment status of main applicants owed a prevention or relief duty (Quarter 4 2024-25)	
	Registered unemployed	40 24.8%
	Not working due to long-term illness / disability	22 13.7%
	Full-time work	20 12.4%
	Part-time work	19 11.8%
	Not seeking work / at home	10 6.2%
	Not registered unemployed but seeking work	7 4.3%
	Retired	7 4.3%
	Student / training	5 3.1%
	Registered employed off work	4 2.5%
	Working irregular hours	1 0.6%
	Other	148 8.7%
	Not known	12 7.5%
	Total	161 100%
	<u>TEMPORARY ACCOMMODATION</u>	
	(Source: Homelessness Case Level Information Collection (HCLIC))	
	Households in temporary accommodation in Dartford at end of quarter (2023-24 to 2024-25)	
	Q1 2023-24	338
	Q2 2023-24	179
	Q3 2023-24	220
	Q4 2023-24	355
	Q1 2024-25	352
	Q2 2024-25	381
	Q3 2024-25	383
	Q4 2024-25	393

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Temporary accommodation used by type (2023-24 to 2024-25)

	B&B (including shared annexes)	Nightly paid, privately managed, self-contained	Hostels (including reception centres, emergency units and refuges)	Private sector accommodation leased by the Council or leased or managed by a registered provider	Local authority or Housing Association stock	Any other type of TA (including private landlord and not known)
Q1 2023-24	9	95	0	78	2	154
Q2 2023-24	11	63	0	47	1	57
Q3 2023-24	22	91	0	41	1	65
Q4 2023-24	20	157	0	129	1	48
Q1 2024-25	7	184	0	117	2	42
Q2 2024-25	9	203	0	121	2	46
Q3 2024-25	7	226	0	118	2	30
Q4 2024-25	3	237	0	119	1	33

Household composition of households in temporary accommodation (2023-24 to 2024-25)

	Single parent with dependent children - Male	Single parent with dependent children - Female	Single parent with dependent children - other / gender not known	Single adult - male	single adult - female	Single adult - other / gender not known	Couple with dependent children	All other household types
Q1 2023-24	14	140	0	48	41	1	59	35
Q2 2023-24	0	7	77	9	4	34	28	20
Q3 2023-24	0	17	82	22	9	35	34	21
Q4 2023-24	0	43	123	27	22	41	61	38
Q1 2024-25	1	57	128	18	14	28	63	43
Q2 2024-25	1	62	129	22	19	32	68	48
Q3 2024-25	1	69	115	32	19	27	73	47
Q4 2024-25	4	80	104	35	23	28	69	50

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Step 2: Information collection	
6. What consultation has taken place with affected groups? Please describe who was consulted and the key findings	Consultation will be carried out to inform draft Temporary Accommodation Charging Policy, as set out below in question 7.
7. Are there any gaps in information? If so, what additional research and/or consultation is needed to ensure that affected groups needs and views are taken into account?	Council officers within the Housing Service, Benefits Service and Finance Service will be consulted in the development of the Temporary Accommodation Charging Policy. Homeless applicants in temporary accommodation, temporary accommodation providers, members of the public and partner agencies, will be invited to comment on the draft Temporary Accommodation Charging Policy. The Housing Advisory Board (HAB) will be invited to comment on the draft Temporary Accommodation Charging Policy. The HAB considers reports on proposed policy, strategy and performance in relation to housing issues and makes recommendations to Cabinet as appropriate. The HAB includes representation from Council officers, elected Members and Dartford Tenant and Leaseholder Forum members.

Step 3: Assessing the equality impact	
8. Consider whether the activity or proposal has or will have any positive or negative equality impacts on the protected characteristic groups in relation to the following aims of the Public Sector Equality Duty: a) tackling unlawful discrimination b) promoting equality of opportunity c) promoting good relations <u>NOTES:</u> • The Initial Screening will have identified which aims of the Public Sector Equality Duty are relevant to the activity or proposal for consideration • For existing activities, consider how they are working in practice for each relevant protected group • For new proposals, consider whether there is anything that could give rise to positive and negative equality impacts for each relevant protected group • If there is no identified equality impact, please tick the 'No Impact' box and explain why in question 9 • If the equality impact is unclear, please tick the 'Unknown' box and explain why in question 9	

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Age	Affordability Using the snap shot of homeless application data (January to March 2025) under question 5 above, working age households owed a prevention or relief duty are proportionally higher than households of retirement age. Just under half (47.2%) of households owed a prevention or relief duty are aged 35-64 and just under half (48.4%) are aged under 35. 4.3% are aged 65+. Households with children living in temporary accommodation are proportionally higher at 70.5% than households without children at 29.5%. The objective of the Temporary Accommodation Charging Policy is to ensure that for all households, the charges for temporary accommodation are fair and dependent on what households can afford to pay. As part of the temporary accommodation placement process, the Council will seek to undertake affordability assessments. Under the draft policy, a household's contribution towards the rent for their temporary accommodation will be dependent on whether the household is awarded housing benefit and the amount of benefit awarded. In cases where the household receives full housing benefit, this will cover the full rental	Support needs It is known that some households experience difficulty in reading or understanding information regarding claiming housing benefit and/or making payments for the required charges for their temporary accommodation. A lack of understanding of responsibilities could risk rent arrears building up and, if this is not addressed, it could ultimately lead to the termination of the temporary accommodation placement and the discharge of the Council's homelessness duties. It is also appreciated that many households face financial and practical difficulties while they are experiencing homelessness. It is recommended that the Temporary Accommodation Charging Policy should outline reasonable steps that will be taken to ensure that households understand any information given about claiming housing benefit and paying for temporary accommodation charges, and are signposted to appropriate support services, including sources of support provided by the Council (i.e. Housing Inclusion Service, Accommodation Service support, the Income Recover Officer and discretionary payments through the Exceptional Hardship Fund and Discretionary Housing Payments).	☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
	element of the accommodation. Where the household receives part housing benefit, they will be responsible for meeting the costs of the difference between the full housing benefit entitlement and what they receive in part housing benefit. And, where a household chooses not to apply for or maintain a claim for housing benefit, or if they are not eligible for housing benefit, they will be responsible for paying the full rental element.			
Disability	Communication needs In accordance with the Council's Equality and Diversity Document Framework, the Temporary Accommodation Charging Policy can be provided in alternative formats, including Braille, audio tape and large print versions of documents. British Sign Language interpreting services can also be provided upon request. Calls can also be received via Relay UK.	Support needs As outlined under 'support needs' in the 'age' category'.	☐	☐
Sex			☒	☐
Gender reassignment			☒	☐
Race	Communication needs In accordance with the Council's Equality & Diversity Document Framework, the Temporary Accommodation Charging Policy can be provided in alternative formats including documents translated into other languages. Telephone and face-to-face language interpreting services can also be provided upon request.		☐	☐

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Step 3: Assessing the equality impact				
PROTECTED CHARACTERISTIC	POSITIVE IMPACTS	NEGATIVE IMPACTS	NO IMPACT	UNKNOWN
Religion/Belief			☒	☐
Sexual Orientation			☒	☐
Pregnancy/Maternity			☒	☐
Marriage and Civil Partnership*	Not applicable as the policy does not apply in the context of employment.	Not applicable as the policy does not apply in the context of employment.	☐	☐

* Regarding the protected characteristic of Marriage and Civil Partnership – public bodies need to comply with the first aim of the Public Sector Equality Duty and only in the context of employment.

Step 3: Assessing the equality impact	
9. If 'no impact' or 'unknown' was selected, please explain	There are no known circumstances where the Temporary Accommodation Charging Policy will cause a negative or disproportionate equality impact on the protected characteristic groups of sex, gender reassignment, religion or belief, sexual orientation, and pregnancy and maternity.
10. If Dartford Borough Council works with partners to deliver the activity or proposal, please describe any circumstances that could give rise to positive or negative equality impacts between different groups	The Council works with private sector landlords and letting agents to secure temporary accommodation for homeless households. There are no known circumstances where these joint working relationships will have a negative or disproportionate impact on equality with respect to these partnership working arrangements. The policy does not have any impact on the level of rent charged by private landlords.
11. Any other comments	Personal charge (nightly paid accommodation) Under the draft Temporary Accommodation Charging Policy, households placed into nightly paid accommodation will be required to make a financial contribution of £10 per week for the accommodation provided. This personal charge is to contribute towards the Council's administration costs for the accommodation; including, procuring the accommodation, arranging placements and ongoing management and monitoring of the accommodation. The personal charge is applied regardless of whether the household receives housing benefit or not. The personal charge is exempt from housing benefit.

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Step 3: Assessing the equality impact	
	A personal charge is not levied to households in DPLS and Council owned temporary accommodation due to the longer-term nature of the accommodation and reduced level of ongoing administration and management costs incurred. Conclusion - Overall the Temporary Accommodation Charging Policy is considered to have a positive impact as it provides a transparent, proportionate, fair and consistent approach to the approach to charging households in temporary accommodation. Charging will be based upon what homeless households can pay; the Council will not charge indiscriminately.

Step 4: Action plan	
12. Based on the information in Steps 1 to 3, please list the actions that will be taken to address: a) any gaps in information and consultation b) how any negative impacts on equality will be mitigated or eradicated	

a) If additional information and/or consultation is required or the impact is still unclear, what actions will you put in place to gather the information you need?

Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views from households in temporary accommodation, temporary accommodation providers, members of the public and partner agencies on the draft Temporary Accommodation Charging Policy	Invite views on the draft policy from households in temporary accommodation, temporary accommodation providers, members of the public and partner agencies	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	October 2025	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer

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Information needs	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Views from the Housing Advisory Board on the draft Temporary Accommodation Charging Policy	Invite views on the draft policy from the Housing Advisory Board	Feedback will, at a formative stage, inform any further changes that may be required to the draft policy in advance of seeking approval for the policy	October 2025	Details of the consultation and any amendments made to the draft policy as a result of the consultation will be included in the Cabinet report	Senior Housing Policy & Performance Officer

b) If any negative impacts on equality were found, what actions will you put in place to mitigate or eradicate these impacts?

Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
Some households may experience difficulty in reading or understanding information regarding claiming housing benefit and/or making payments for the required charges for their temporary accommodation. A lack of understanding of responsibilities could risk rent arrears building up and, if this is not addressed, it could ultimately lead to the termination of the temporary accommodation	The Temporary Accommodation Policy should outline that reasonable steps will be taken to ensure that households understand any information given about claiming housing benefit and paying for temporary accommodation charges, and are signposted to appropriate support services, including sources of support provided by the Council (i.e. Housing Inclusion Service, Accommodation Service support, and discretionary payments	Homeless households will receive the support they need to understand their responsibilities towards the charges for their temporary accommodation and receive financial and practical support.	September 2025	Through the policy review process	Senior Housing Policy & Performance Officer

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Identified impacts (and who is affected)	Action	Intended outcome	Date for completion	How this will be monitored	Responsible officer
placement and the discharge of the Council's homelessness duties. It is also appreciated that many households face financial and practical difficulties while they are experiencing homelessness.	through the Exceptional Hardship Fund and Discretionary Housing Payments).				

Step 5: Decision making and future monitoring	
13. Which decision making process does this Customer Access Review need to go through? i.e. who does this need to be approved by?	Head of Legal Services and Director of Housing & Public Protection
14. Is the subject of the Customer Access Review going to committee? If yes, include your findings in the committee report and attach this assessment to the report	☒ Yes ☐ No
15. How will you continue to monitor the activity or proposal on protected characteristic groups?	• HCLIC data returns • Customer feedback surveys • Complaints data
16. When will you review this Customer Access Review?	The Council will review the Temporary Accommodation Charging Policy every three years or earlier to address legislative, regulatory, best practice or operational issues. A Customer Access Review will be undertaken in conjunction with the review of the policy.

Step 6: Final steps	
17. Once this Customer Access Review has been approved, send this assessment to the Policy & Projects Officer	
18. Implement the actions identified from this Customer Access Review and ensure progress is monitored and recorded	

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Reviewed by Legal Services:

J. Wenham

04.09.25

Reviewed by Director of Housing & Public Protection:



28.8.2025