

**“No Local Connection”: Officer /CEB response to Scrutiny  
Committee recommendations**

**and**

**"Workplace Equalities" : Scrutiny recommendations and CEB  
response**

**City Executive Board - Wednesday 14 November 2018**

7. **Scrutiny Committee Reports** (Pages 3 - 18)

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## Officer Comments and Advice on Recommendations of the No Local Connection Review Group

Recommendation	Officer comments	CEB Comment	Accept
<b>Part 1: Redefining the Local Connection</b>			
<p><b>Recommendation 1:</b> That the Council extends the exemption criteria within the Local Connection Policy to provide a more comprehensive narrative and make clear that discretion may be used to offer a local connection to a person in circumstances where:</p>	<p>There is already unfettered discretion within the current procedures which is regularly exercised (especially in the granting of an exemption) and are written in such a way as to be flexible and to allow for discretion, rather than to prescribe a response to any and every eventuality. Examples of how exemptions might be applied can be shared.</p> <p>It should be noted however, that current exemption criteria, which grants access to the pathway, usually with a Pathway Connection, still limits the move-on options available on exit. Any changes at the exit point will require changes to the Allocations Policy.</p> <p>It should also be noted that Oxford has a concentration of rough sleepers from Oxfordshire, but often also from neighbouring areas that may not have such good service provision, including Aylesbury and Reading. The Council would be failing in its fiduciary duties (in spending Oxford residents money correctly and achieving best value) if it offers services to persons with a stronger local connection to another local authority.</p>	<p>I agree that changes should be made to provide much more clarity and transparency about how officers use the discretion granted to them to apply exemptions to NLC rules. Exemptions are an important tool in the box for this authority to provide support and assistance where it is needed. Discretion is important as individuals affected by homelessness do not always fall into neat boxes and officers need to be allowed to use their professional opinion and their commonsense in order for the best result to be obtained. However, examples of how this discretion is applied and case studies of exemptions should be publically available in order to increase transparency around the process and assist those advocating on behalf of individuals trying to access the pathway.</p>	<p>Yes to a more comprehensive narrative and more clarity on how discretion is currently used to apply exemptions to NLC rules.</p>
<p>a) They are known by the Council to have slept rough or 'sofa surfed' in Oxford for a continuous period in excess of 6 months, with no clear prospect of reconnection to another local authority area.</p>	<p>This is already possible in the Adult Homeless Pathway (AHP) and is often considered for when an exemption is sought. In some cases, exemptions are granted before 6 months and this is an example of why one shouldn't be too prescriptive in terms of the exemption criteria.</p> <p>However, according to the Code of Guidance Part 7 (Homelessness) (HA 1996) this does establish a local connection to which the Council must have due regard.</p>	<p>If someone has slept rough on the streets of Oxford and has been known to OXSPOT throughout this period then they should be considered as having a local connection for the purposes of the Adult Homeless Pathway.</p> <p>We should always have due regard to with the Code of Guidance HA 1996 and apply the principles to each case on their own merit.</p>	<p>Yes, in part.</p>
<p>b) Their long term physical or mental health condition (including substance misuse) poses a significantly elevated risk to that person's health and safety, beyond that experienced by other rough sleepers.</p>	<p>This is already possible under current policy, although if a person has a better connection elsewhere, then a reconnection (after urgent risks have been actively reduced) is preferred, especially if that connection is to an Oxfordshire District Council area.</p> <p>However, if Mental Health is the primary need, and the client is clustered, then access to the Oxfordshire Mental Health Pathway would be more appropriate and is via a GP connection.</p>	<p>Priority access to suitable services should always be afforded to those who are especially vulnerable because of health issues.</p> <p>The Oxfordshire Mental Health Pathway does not require a local connection (other than being registered with a local GP) and may be the most suitable option.</p> <p>Options for reconnection to a home district should be explored first while clients are assessed and given a safe place to stay such as sit-up.</p> <p>This is an area where the importance of officer judgement on when to apply an exemption is especially relevant.</p>	<p>No.</p>
<p>c) They are known by the Council to be fleeing violence from another area within the UK, with no clear prospect of reconnection to another local authority area that is considered safe.</p>	<p>This is already the case, in that an 'exemption' is granted to enable access into the pathway.</p>	<p>This is already done through an exemption. This is an example of where better information about how exemptions are applied is needed.</p>	<p>Yes</p>

<p><b>Recommendation 2:</b></p> <p>That the Council grants a lifetime local connection to people who were born in Oxford, where no period of absence from the City would invalidate their connection, except in circumstances where they have a more appropriate local connection to another Oxfordshire district.</p>	<p>This recommendation is unworkable in terms of volume and application. Relaxing the criteria in relation to birth is problematic, as on this basis all children born in the John Radcliffe regional, general hospital would qualify.</p> <p>Other options for demonstrating an enduring local connection, e.g. that a person has spent the majority of their childhood years in the city, are also problematic because of the difficulties – for the individual and the Council – in producing / reviewing evidence.</p> <p>However exemptions can be granted when people are unable to demonstrate strong connections, but equally have demonstrable connections to the City.</p> <p>If a person has a better connection to another area, for example because they have lived continuously in that area for many years, then the option of reconnection should be explored first.</p> <p>Granting a far bigger pool of potential homeless persons a local connection will only result in more people being accommodated in the AHP if the capacity (and throughput) increases. This increased demand could also result in more competition at entry to the AHP with people’s expectations being raised beyond the ability of the pathway to meet these needs.</p> <p>This needs to be understood and assessed before the implementation of such significant changes.</p> <p>We should also note our responsibilities under the Equalities Act.</p>	<p>Oxford Hospitals provide maternity services for a very wide area, we also have a relatively transient population with many people coming to Oxford to study or work for a fixed period before moving on. It would make no sense to grant children born within the city boundaries lifetime rights to housing services provided by the council.</p> <p>This is another key area where officers need the flexibility to apply a common sense approach to the granting of exemptions as no two people will have identical connections to the city, again, published examples of exemptions which have been granted will help future clients to make their case and produce more confidence in the system.</p>	<p>No.</p>
<p><b>Recommendation 3:</b></p> <p>That the Council grants a local connection to people confirmed as sustaining a contracted voluntary role within the City for a period of 6 months.</p>	<p>Undertaking paid work can already help a person to establish a Local Connection under the AHP Policy. This work must be genuine (usually over 16 hrs per week and not very short term), and can include zero hour contracts, but must be evidenced, eg. with wage slips.</p> <p>The Allocations Scheme (which helps enable exit from the AHP) requires applicants – seeking to establish a Local Connection through employment only – to be undertaking work in Oxford, of over 16 hours per week, and that this is not ‘short term, marginal or of a temporary nature’.</p> <p>For purpose of the Housing Act 1996, the Local Authorities Agreement (The Procedure for Referrals of homeless applicants to another local authority) clearly indicates that employment cannot be of casual nature.</p> <p>In this context, voluntary work would be considered as casual work and would not therefore provide sufficient evidence of employment for either the AHP or Allocations Scheme.</p> <p>However, case law has established that unpaid employment can constitute employment so voluntary work could constitute employment. It would similarly need to meet other employment criteria e.g. not of a casual nature. This relates specifically to Part 7, but could equally apply to Part 6.</p>	<p>More work will need to be done on this to make sure that any changes will not be open to abuse. The council would need to be confident that despite being unpaid and voluntary the work is not casual, short term, marginal or temporary.</p> <p>I would also want to be sure that any local employer is not exploiting unpaid labour at the expense of providing paid jobs.</p> <p>However I agree with the principle in relation to the adult homeless pathway.</p>	<p>Yes.</p>
<p><b>Recommendation 4:</b></p> <p>That the Council extends the close relatives connection criteria to include first cousins, grandparents and grandchildren. Deceased family members in the immediate family (mother, father, brother, sister or children) should also be explicitly referenced in the policy as providing a connection.</p>	<p>See comments above.</p> <p>The purpose of the ‘close family associations’ LC approach is to recognise frequent ‘contact, commitments or dependency’ that someone may have with close family members that have been resident in the city for 5 years or more, and the mutual benefit that this can provide.</p> <p>Grandparents and grandchildren are already recognised as</p>	<p>The nature of the relationship with family members should be the primary determinant of whether they are ‘close’ or not, not the strength of blood ties.</p> <p>Deceased relatives should not be considered as they no longer form part of a family support network which this policy aims to protect.</p>	<p>Yes, in part.</p>

	<p>being 'close family' provided there are sufficiently close links in form of frequent contact, commitment or dependency as are step-families.</p> <p>First cousins are not recognised, but the policy allows for flexibility in exceptional situations. Additionally, case law has established the character of the family association is at least as relevant as the degree of consanguinity. Deceased relatives do not meet this criterion.</p> <p>For the purpose of the Housing Act 1996 in order to give rise to a local connection, the family members relied upon as family associations should usually have been resident in the district for a period of at least five years at the date of application from homelessness assistance, or for a lesser period if the family situation means that five year residence could not apply, for instance in cases of refugees or other recent arrivals to the UK.</p>		
<p><b>Recommendation 5:</b></p> <p>That a person's stay into institutions such as hospital, prison or rehab should not invalidate their local connection. Specifically, time spent in these institutions should not affect a person's residency connection time (six out of the last twelve months or three out of the last five years), and entry and exit into these institutions should 'freeze' the accounting period.</p>	<p>This is already the case when considering local connection in the context of AHP. Other approaches including Priority 3 applications to the AHP and work undertaken by the Trailblazer Team to prevent homelessness and rough sleeping.</p> <p>For purpose of Part 7 (Homelessness) Housing Act 1996 The Local Authorities' Agreement suggests that a working definition of normal residence sufficient to establish a local connection should be residence for at least 6 months in an area during the previous 12 months, or for three years during the previous five year period. The period taken into account would be at the date of the decision. For the purpose of the Housing Act 1996 it is not done, and is not within our gift to change. However, stays in hospital or rehab will not (in most instances) invalidate local connection because a person will still be normally resident at their home address (under Part 6 (Allocations) and 7 (Homelessness) Housing Act 1996) '</p> <p>With regard to prisoners (or a prolonged hospital stay) this could and should be considered under special circumstances' and this is recognised in LGA agreement</p> <p>Where the applicant has no local connection with any authority, this will confer a connection with where they choose to apply under Part 7 (Homelessness) Housing Act 1996.</p>	<p>This is already the case for the AHP.</p> <p>The provision for special circumstances means that in practice the recommendation is already normally followed under Part 6 and Part 7</p>	<p>Yes in part.</p>
<p><b>Recommendation 6:</b></p> <p>That the Council negotiates terms with neighbouring district councils to grant an Oxford local connection to people with a connection to areas adjoining, or very close to, the city boundary such as Botley and Kennington, where it is requested.</p>	<p>See previous comments about the Council's fiduciary duties [Recommendation 1].</p> <p>The Vale of White Horse Council has a duty to persons rough sleeping or with a Local Connection to those parts of Botley outside of the Oxford City Boundary, and also Kennington. District Boundaries, not urban areas are used for this purpose, as they are for all Council duties.</p> <p>This would also apply to other adjacent areas such as Kidlington.</p>	<p>The council will always support efforts to reconnect rough sleepers to their home district, so that the cost of their support is borne by that authority. When individuals are 'reconnected' it is always to an actual available bed space.</p> <p>20% of the people sleeping rough in Oxford have a proven connection to one of our neighbouring districts and those councils need to step up the level of services they provide in their area to cope.</p> <p>We are continuing to work with two of our neighbouring councils to try and support winter night shelters in their area using some of the RSI funds successfully obtained by Oxford City Council.</p> <p>We have a funding mechanism already in place under the pooled budget arrangement where District beds are provided in the City e.g. O'Hanlon house serves all Districts in the County. (27 for OCC, 11 CDC, 6 VWDC, 6</p>	<p>No.</p>

		SODC and 6 WODC) and future plans for Rymers Lane (in partnership with WODC)	
<p><b>Recommendation 7:</b></p> <p>That where any changes to the Local Connection Policy (set out in recommendations 1-6) are not amenable to the City Executive Board on a permanent basis, a 12 month pilot should be taken up to provide insights into the level of demand, cost and effectiveness of introducing such changes.</p>	<p>The costs and impacts of the proposed changes would need to be appraised, understood and properly resourced before they can be implemented.</p> <p>As the effects of the proposed changes are untested and the results are unknown, there is a high risk that implementing the changes in a 'live system' could overwhelm the AHP, leading to delays in admission even for eligible individuals and blockage at the point of exit.</p>	<p>It would not be responsible to pilot major changes without first assessing the potential impact on costs and the impact of such changes on the availability of beds within the adult homeless pathway.</p> <p>Widening eligibility without any corresponding increase in capacity will not lead to any more people being helped off the streets.</p> <p>Monitoring of the RSI beds is part of the programme on an ongoing basis with learning being captured along the way.</p>	No.
<p><b>Recommendation 8:</b></p> <p>That the Council partners with Crisis and other partners (e.g the City Conversation) to undertake a full assessment of the social and economic impact of any changes to the Local Connection Policy after 1 year of implementation (or piloting). The outcome of the assessment should be reported to the Scrutiny Committee and the City Executive Board, and should include data and conclusions concerning:</p> <p>a) The demand for bed spaces within the pathway  b) The proportion of people rough sleeping with a connection to Oxford  c) The estimated savings and expenditure for other public services  d) Any impact on equalities, with a specific focus on gender and sexuality  e) How any changes have impacted on neighbouring district councils</p>	<p>As stated above [Recommendation 7], the costs and impacts of the proposed changes would need to be assessed in advance of any changes to AHP Policy to determine costs, impacts and risks.</p> <p>This would be a substantial, detailed piece of work that would need to be commissioned from an organisation or individual, requiring funds to be identified and secured.</p> <p>The City Council would also need to allocate time and resource to commission the work and assist with data, benchmarking etc.</p> <p>It should be noted that via the MHCLG-funded Rough Sleeping Initiative (RSI) Programme, changes including increased access to accommodation for people with no LC or RPF are already being piloted, with evaluation and learning built in.</p> <p>With regard to Recommendation 8d) appears to be outside of scope of the LC Review.</p>	<p>We will not be piloting changes.</p> <p>A full assessment of the recommended or adopted changes would be a major piece of work which would probably need to be commissioned from consultants.</p> <p>However, some of this information can easily be made available to CEB or the Scrutiny Cttee i.e. the number of occupied/unoccupied spaces with the AHP; the proportion of people sleeping rough with an oxford connection; the sex of rough sleepers and those within the AHP;</p>	No.
<p><b>Recommendation 9:</b></p> <p>That the Council makes representations to the other Oxfordshire District Councils to:</p> <p>a) Increase their funding for bed spaces in O'Hanlon House, particularly for those individuals with complex needs.  b) Adopt any changes agreed to Oxford's Local Connection Policy, and that any agreed changes be updated in the Oxfordshire Adult Homeless Pathway Common Operational Protocol.  c) Collectively review the system for allocating bed spaces to remove procedural barriers to 'lending' beds between the Oxfordshire District Councils, to adjust for varying demand between the localities.</p>	<p>a) There is no capacity to increase bed spaces at O'Hanlon House as the 56 units are split between the 5 Districts. Oxford City has 27 of these units and the remainder are split between the other authorities. It would be better if the Council could encourage the Oxfordshire District Councils to increase provision for people with complex needs in their localities.</p> <p>b) Any changes to the Policy / Common Operational Protocol which governs operation of the AHP would need to be agreed by the Joint Management Group (JMG) which oversees the joint commissioning arrangements between Oxfordshire County Council, OCCG, Oxford City Council and the Oxfordshire District Councils.</p> <p>c) Officers are not aware of any barriers to lending beds between the Oxfordshire District Councils.</p>	<p>We will absolutely continue to make representations to our neighbouring district councils and the county council to maintain or increase their funding for homelessness services.</p> <p>See the officer advice on a,b,c.</p>	Yes, in part.
<b>Part 2: Reconnecting People</b>			
<p><b>Recommendation 10:</b></p> <p>That an individual's refusal to engage with the Council, or to reconnect to another area, should not restrict their access to the sit-up service, except in circumstances where they pose a risk to the safety or progress of other people using the service.</p>	<p>Many people enter the AHP via the sit-up service. OxSPOT work with people in sit-up to establish trust and engagement, so a person entering the service may not initially be fully engaged.</p> <p>However, it's important that there is high throughput through the service to prevent it becoming blocked and therefore preventing another person coming in from the streets. If a client refuses to engage with services during their time in sit-</p>	<p>Current capacity in sit-up is limited (even with the RSI funded expansion to 20 places), so it is right that priority is given to those willing to engage with services and so have the prospect of moving on, freeing up their sit-up place as they do so.</p> <p>Longer term and subject to resources, officers are working on proposals which would allow for</p>	Yes, in part.

	up, there is a risk that their occupancy will block access for another individual. This would significantly change the purpose for which it was designed.	an expanded sit up service and/or a night shelter service which could take people of the street with only a minimal level of engagement.	
<b>Recommendation 11:</b> That the Council trials a reconnection log for 12 months to monitor the outcomes and effectiveness of reconnections to other areas. The reconnection log should be presented to the Housing Panel when there is sufficient data to draw conclusions.	This is possible but following up on re-connection would require longitudinal analysis for which additional resource would be needed.	OXSPOT have a dedicated reconnection service. A report of their work could be made available to the Housing Panel.  Efforts will be made to attempt this, bearing in mind some of the difficulties in keeping in touch once people have moved out of area, and moved on with their lives.	Yes
<b>Recommendation 12:</b> That the Council commissions a report to be brought forward in 2019 setting out options for establishing a county wide reconnection service having regard to lessons that can be learnt from the London-wide reconnection service.	The Council already funds this. Other Councils can be approached, but may not wish to fund – and they use different outreach models and providers. Maybe the County Council should be asked to lead this?	Oxford City Council will continue to work to reconnect rough sleepers in the city to their home district, who are the body with responsibility to support the individual, whenever this is possible. Officers will be asked to look at what improvements can be made to make reconnections more successful. This should include dialogue with neighbouring districts and the county council. This could be the subject of a report to the Housing Panel if required.	Yes, in part.
<b>Part 3: Allocating Housing</b>			
<b>Recommendation 13:</b> That the Council revises the Housing Allocations Scheme to:	The Statutory Guidance on Social Housing Allocations for Local Authorities in England (2013) provides as follows:  “The Government is of the view that, in deciding who qualifies or does not qualify for social housing, local authorities should ensure that they prioritise applicants who can demonstrate a close association with their local area. Social housing is a scarce resource, and the Government believes that it is appropriate, proportionate and in the public interest to restrict access in this way, to ensure that, as far as possible, sufficient affordable housing is available for those amongst the local population who are on low incomes or otherwise disadvantaged and who would find it particularly difficult to find a home on the open market.”  “The Secretary of State believes that including a residency requirement is appropriate and strongly encourages all housing authorities to adopt such an approach. The Secretary of State believes that a reasonable period of residency would be at least two years.”  However, the guidance goes onto re-iterate that “it is important that Housing Authorities take proper account of special circumstances” and “retain a discretion to deal with individual cases where there are exceptional circumstances”  The Head of Housing is delegated to make minor changes to the Allocations Scheme, but as a framework document, and under law, any more substantial change would require consultation and agreement at full Council.  It is also agreed by the Oxford Register for Affordable Housing (ORAH) partnership with key Registered Provider partners, with the agreement for the Council to operate the scheme on behalf of the ORAH partnership.	CEB will not be revising the Housing Allocation Scheme as a result of this review panel report.  Oxford’s Allocations scheme is already far less strict than Government guidance which recommends a two year residence criteria but we treat permanent residence of a minimum of 6 months as sufficient for local connection  See Officer comments.	No.
a) Accept any person who qualifies for a local connection under any accepted recommendations in this review	With regard to the ‘Housing General Register’ – this is based on ‘settled accommodation’ i.e. 6 out of the last 12 months of settled accommodation immediately prior to the application, or		

<p>onto the Housing Register.</p>	<p>3 out of the last 5 years of settled accommodation in that district only close family connections resident in Oxford and/or paid employment of 16 hours or more.</p> <p>The existing Allocations Scheme already allows for exceptions on a case by case basis to be included on the Housing Register including older applicants aged 60+, ex-members/family members of the armed forces, applicants needing to leave an area due to threats of life and limb and other exceptional cases including those in the awarded an exemption in the homeless pathway without a connection elsewhere.</p> <p>The Allocations Scheme also already allows for exceptions on a case by case basis for other housing applicants (so as not to fetter its discretion) but to manage expectations and balance the demand from existing housing applicants with a strong local connection, it also makes it clear it expected these cases will be very rare due to the high levels of households applying for housing in Oxford with a local connection to the City</p> <p>There is the opportunity for people ready to move-on from agencies (in the AHP, and the mental health pathway) to be included in the General Register with Move-on priority status, when appropriately referred from that provider.</p> <p>There may be some scope to review some supported accommodation in the city, to determine whether residence of greater than two years, should be considered 'settled' including Emmaus, some Response accommodation, and some other provision (inc ACT). 6 months would not be considered a significant enough stay.</p> <p>If this is referring to persons to whom the Council has accepted a statutory homeless duty following an approach under homelessness legislation (Housing Act 1996 as amended) – definitions are set by legislation and case law and cannot be determined locally.</p> <p>Please note that there are already 2200 people on the Council's Register and that this recommendation is considered within the context of trying to manage a scarce resource.</p>		
<p>b) Ensure that time spent in prison, hospital or rehab does not affect a person's residency connection time (six out of the last twelve months or three out of the last five years), and entry and exit into these institutions should 'freeze' the accounting period.</p>	<p>b) For the purpose of Part 6 (Allocations) of the Housing Act 1996 where a person does not have a local connection each case can be considered on its own merits and an exception can be considered in individual cases.</p> <p>If a person from Oxford is in prison or temporarily absent in hospital or rehabilitation it is likely they will retain a local connection through former residence if they return directly to Oxford on discharge. This is because in most cases they will have still lived in Oxford 6 out of the last 12 months or 3 out the last 5 years or may have close family associations. Where a longer term absence has taken place and a person doesn't meet the normal local connection criteria. Consideration would need to be given to the individual's case, for example, if a former resident with a local connection went directly in to an institution and on discharge did not immediately return to Oxford and went elsewhere the reasons why would need to be considered and it is possible they would no longer have a local connection and exception might not be considered applicable.</p>		



<p>c) Accept any person onto the Housing Register who is confirmed as having lived in supported accommodation continuously within Oxford for more than 6 months, including accommodation services that are recognised but not directly funded by the Council.</p>	<p>c) In the context of the local housing crisis in Oxford, Allocations Guidance advises a strong bias for residence within District, exceptions are available already, all local Districts apply similar Local Connection policies to OCC in Oxon. A change to this would mean a large increase in the number of applications from those with a past or tenuous connection Oxford, possibly inadvertently increasing street homeless as more come to Oxford from the Districts. It is very hard to verify circumstances/local connection and local residents with a strong connection will be disadvantaged because housing offered to those others.</p> <p>Officers would be more concerned about its application to e.g. the mental health pathway which has over 356 units none of which require any consideration of local connection.</p>	<p>Officers should explore reviewing some supported accommodation in the city, to determine whether residence of greater than two years, should be considered 'settled' including Emmaus, some Response accommodation, and some other provision (inc ACT). 6 months would not be considered a significant enough stay.</p>	<p>Yes, in part</p>
<b>Part 4: Commissioning and Budget Setting</b>			
<p><b>Recommendation 14:</b> That the City Executive Board commissions a report to be brought forward in 2019 setting out options for the Council entering into arrangements with colleges, registered social landlords and private landlords to take over and refurbish sub-standard and empty properties. The Council would then sublet the refurbished properties, at a minimum rent, to priority homelessness cases before returning the properties to their owners after a mutually agreed period.</p>	<p>Officers submitted a report to CEB in September 2017 setting out these options. To date, despite numerous attempts by Officers, no buildings have been successfully brought forward.</p> <p>Note also the Real Lettings developments to meet the needs of people moving on from the pathway.</p>	<p>We already have £20million (which received a further £5million of social investment) invested in local properties which we use as temporary and emergency housing. These are let at LHA rates and the scheme is already saving the council money as use of PRS and B&amp;Bs has dropped.</p> <p>Our priority must remain the building of more homes available at social rents, including increasing our council stock.</p> <p>Where properties are sub-standard we will take enforcement action whenever appropriate, we also already have an empty homes officer who has been successful at reducing the number of empty homes in the city in recent years.</p>	<p>No.</p>
<p><b>Recommendation 15:</b> That the Council continues to commission at least one female only overnight accommodation provider in the Adult Homeless Pathway and keeps demand for this provision under review. Opportunities should be sought to extend this provision for women with no local connection where possible, if further spaces are needed to meet demand.</p>	<p>A women's only service is currently being piloted as part of the RSI initiative. Officers will use this initiative to learn more about what is needed in the future.</p> <p>Consideration is given to ensuring that various needs, vulnerabilities and personal characteristics can be met in any new service provision, and this was one of the drivers to de-commission larger homeless hostels and move to dispersed provision and to hostels that cluster rooms together and minimise open communal spaces, etc</p> <p>Local connection for this service reflects previous comments made.</p>	<p>It will be important to learn from the experience of the women only house we are currently piloting to see if this is a service which should continue. If there is demand for it then it should.</p> <p>All provision within the AHP, including that accessible to people without a local connection should take into account the needs of female service users.</p>	<p>Yes.</p>
<p><b>Recommendation 16:</b> That the City Executive Board, as part of its budget setting process, identifies provision for:</p> <p>a) Free room hire and refreshments for a female homelessness forum. The Council should also ensure these women's views are represented within the Council's decision making process on homelessness issues.</p> <p>b) Free sanitary products to be available for women experiencing homelessness 24 hours a day. The location of distribution for these products should be agreed in liaison with women currently experiencing</p>	<p>The Council should be able to support this, subject to confirmation by the Town Hall.</p> <p>There are already many opportunities for service-users' experience to be fed back, including through the Tenant Involvement Team (in Housing); into the County Housing Support Advisory Group (HSAG – officer group - under the Health Improvement Board); and to the Council's Housing Panel or Scrutiny group but officers also open to doing more and ensuring people with lived experience's voices are heard.</p>		<p>A) Yes. B) Yes.</p>

homelessness.			
<p><b>Recommendation 17:</b></p> <p>That the Council makes on site provision for domestic pets a material consideration as part of the supported accommodation commissioning process.</p>	<p>To be noted that much of the dispersed supported housing is leased from the private sector and therefore nearly always has a strict no pets policy but officers can continue to consider when commissioning.</p> <p>It should also be noted that having a dog is a significant barrier to move on with many RPs and most private sector landlords refusing to allow pets.</p> <p>Anyone engaging with OxSPOT or other services will receive advice on looking after pets and charities that can assist.</p> <p>SWEP 18/19 will continue to provide kennelling for any person who needs it for their dog.</p>	The demand for accommodation with capacity for pets should be kept under review and provided where possible.	Yes.
<p><b>Recommendation 18:</b></p> <p>That the Council engages with Crisis and the City Conversation to see what further opportunities exist for piloting innovative Housing First and Critical Time Intervention programmes, given their rates of success and relative cost-benefit ratios.</p>	<p>Housing First, as well as Acacia Housing (which is based on the same principles) has been commissioned in Oxford for the last 6 years.</p> <p>Officers would welcome the exploration of Critical Time Interventions.</p>		Yes.
<p><b>Recommendation 19:</b></p> <p>That the Council, as part of its budget setting process, gives consideration for contingency funds to be made available for the Council's commissioned outreach Service (OxSPOT) to be more flexible and reactive to changes in homelessness demand throughout the year. For example, extending shifts to meet spikes in the numbers of people sleeping rough.</p>	<p>Increased capacity and flexibility has already been achieved as a result of the service expansion, funded by the MHCLG grant for the RSI Programme.</p> <p>As part of ongoing efforts to optimise the effectiveness of services and in order to meet national targets for the elimination of rough sleeping by 2027, Officers be asked to explore how front end services including Outreach can be focussed and aligned to deliver improved client outcomes, year round, including building in flexibility to gear capacity up and down to meet demand.</p>	This does not require contingency funds. The OXSPOT team have already received a boost with three extra FTE for 18/19 and 19/20 and do not report any problems with capacity.	No.
<p><b>Recommendation 20:</b></p> <p>That the Council writes to Central Government to welcome the new funding made available through MHCLG this year, and lobby for greater assurance about the necessity of long term funding to sustain new support services which will help deliver their Rough Sleeping Strategy.</p>	Officers would welcome this recommendation.	The portfolio holder also welcomes this recommendation!	Yes.
<b>Part 5: Communicating What We're Doing</b>			
<p><b>Recommendation 21:</b></p> <p>That all future Council policy documents referencing homelessness should recognise the net positive contribution that people experiencing homelessness can make (e.g. the skills, experience and diversity they bring). Homeless people themselves should not be framed in a negative light and this should be reflected in the Council's communication's plans.</p>	<p>The Council already takes care in its communications to portray the stories of homeless people positively, for example via the videos recently commissioned for the Trailblazer Programme,</p> <p>The Council also commissions services to take an asset or strengths based approach to supporting people who are experiencing homelessness, and to work with people in a psychologically informed way.</p> <p>However, it is also worth noting that sleeping rough is</p>	Positive stories should be shared whenever and wherever appropriate. Homeless people themselves should never be framed in a negative light.	Yes.

	dangerous and those who do are highly vulnerable, and efforts to portray the positive contributions that people experiencing homelessness can make, should not obscure this. .		
<p><b>Recommendation 22:</b></p> <p>That the Council recognises the value someone's homelessness experience can potentially bring to the employed officer workforce, and that it be given due weight in the recruitment process for staff supporting the homelessness function.</p>	<p>Commissioned service providers are encouraged to develop user groups for their services. Many recruit workers from their volunteer base, including GROW workers. For example, Aspire employs 3 GROW workers as community navigators under the Trailblazer (commissioned contract).</p> <p>Employment and recruitment for the City Council is covered under HR policies, and are designed to enable fair recruitment and ways to actively encourage diversity are welcomed.</p>		Yes.
<p><b>Recommendation 23:</b></p> <p>That the Council revisits its approach to communicating with people experiencing homelessness, local service providers and the public to better convey information about the Local Connection Policy, how it is applied, and what wider support services are available in the City. Any significant changes (e.g a new notice board or public leaflet) should be presented to the Housing Panel for comment prior to implementation.</p>	<p>Information relating to rough sleeping and homelessness is already provided on-line and in key locations for rough sleepers, and persons wanting to report rough sleeping, including in the window of the customer contact centre at St Aldates, the Police Station etc.</p> <p>Officers agree that more can be done to improve communications with people experiencing homelessness and other stakeholders, however it is important to note that the best thing that any person who is concerned about somebody who maybe sleeping rough is to:</p> <p>Contact Oxford SPOT on 01865 243 229 or via email <a href="mailto:Outreach.Oxford@mungos.org">Outreach.Oxford@mungos.org</a></p> <p>Oxford SPOT is not an emergency service, but calls and emails will be followed up as soon as possible.</p> <p>You can also report a rough sleeper through the national <a href="http://www.streetlink.org.uk">www.streetlink.org.uk</a> website or call StreetLink on 0300 500 0914.</p> <p><b>If you believe a rough sleeper's health is in immediate danger, please call 999.</b></p> <p>Officers could develop a more comprehensive strategy in terms of how it engages with people experiencing homelessness and other stakeholders, on a wide range of issues that impact their lives, not only the LC policy.</p>	<p>As set out earlier, the council should publish anonymised details of case studies where discretion has been used to grant an exemption to our local connection policies in relation to the AHP. This will increase transparency and confidence in our procedures and assist those working with rough sleepers to make their case for an exemption.</p> <p>Officers are working on a business card for public circulation to publicise the work of OXSPOT.</p> <p>I have also asked officers to commence work on a booklet which could be a resource for rough sleepers, those working with rough sleepers and concerned members of the public which sets out the wide range of support services available in the city.</p>	Yes.
<p><b>Recommendation 24:</b></p> <p>That the Leader considers appointing a City Executive Board member with exclusive responsibility for Homelessness to provide public clarity on board member roles and raise the profile of the issue, given the increasing funding and support being offered in this area.</p>	This is a matter for the Leader of the Council	This is a matter for the Leader. However, as I am a full-time councillor I don't believe that I lack the time to devote to this issue just because it is not my only area of responsibility.	No.
<p><b>Recommendation 25:</b></p> <p>That the Board Member responsible for Homelessness considers attending the quarterly contract management meetings of the largest supported accommodation provider(s) commissioned by the Council.</p>	The Portfolio holder would be welcome to attend or officers could provide a quarterly summary of all SLA performance returns from each funded service.	I will attend the next meeting that I am available for and will continue to attend if my attendance proves to be useful.	Yes.

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**To:** City Executive Board  
**Date:** 14 November 2018  
**Report of:** Scrutiny Committee  
**Title of Report:** Workforce Equalities Annual Report

<b>Summary and recommendations</b>	
<b>Purpose of report:</b>	To present Scrutiny Committee recommendations concerning Workforce Equalities.
<b>Key decision:</b>	No
<b>Scrutiny Lead Member:</b>	Councillor Andrew Gant, Chair of Scrutiny
<b>Executive Board Member:</b>	Councillor Nigel Chapman, Board Member for Customer Focussed Services
<b>Corporate Priority:</b>	An Efficient and Effective Council
<b>Policy Framework:</b>	None
<b>Recommendation: That the City Executive Board states whether it agrees or disagrees with the recommendations in the body of this report</b>	

<b>Appendices</b>
Appendix 1 – Draft City Executive Board response to the recommendations

### **Introduction and overview**

1. At its meeting on 6 November 2018, the Scrutiny Committee considered the Annual Workforce Equalities Report, prior to consideration by the City Executive Board (CEB) on 14 November. The issue of workforce equalities has remained high on the Committee's agenda in recent years, following a significant piece of work undertaken by the Equality and Diversity Review Group, chaired by Councillor Tom Hayes, in 2016, and subsequent monitoring of the Review Group's recommendations.
2. The Committee would like to thank Councillor Chapman, Board Member for Customer Focussed Services, for attending the meeting to answer questions. The Committee would also like to thank Helen Bishop (Head of Business Improvement), Paul Adams (HR and Payroll Manager) and Chris Harvey (Organisational Development Manager) for supporting the meeting.

3. Councillors noted the improved level of trend data made available since it previously considered the issue in March 2018, as requested by the Scrutiny Committee earlier this year, and the Board Member himself as a member of the Committee at that time. The data provided the Committee with a more robust assessment of the profile and diversity of the Council's workforce, and enabled the Committee to identify where improvements needed to be made.

### **Summary and recommendations**

4. As an administrative point, the Committee noted that the Council currently separates Christians and Catholics as part of its monitoring of the diversity of the workforce. The Committee were of the view that Catholics should not be categorised under a separate heading in Oxford.

#### ***Recommendation 1 - That the Council does not differentiate between Catholics and Christians in its workforce equalities data.***

5. The Committee noted that the 2011 Census data showed that 18.7% of Oxford's economically active population come from an ethnic minority background, excluding full-time students. However, the Workforce Equalities Report notes that only 9% of Council and Oxford Direct Services (ODS) employees are from a BAME group, and this has remained relatively consistent since 2015/16. The lack of BAME representation is particularly acute within ODS, at just 5.8%, whereas the Council achieves a 12% level of representation.
6. In addition to this underrepresentation, the Committee expressed concern that BAME members of staff were overrepresented within lower paid roles, when compared to higher paid roles. The report explained that around 90% of staff from a BAME group are on grade 3 – 7 pay scales, which compares with 66% of staff from a white group.
7. The Committee reemphasised the need for job descriptions and appointment criteria to take account of a person's ability to speak a second language. This was previously a recommendation of the Equality and Diversity Review Group in 2016. The Committee believe that the ability to speak a second language should give a candidate a competitive advantage given the diversity of languages spoken by City residents.
8. The Committee and Board Member agreed that more proactive work is needed to address the need for greater diversity within the workforce. It is noted that the Equalities Action Plan 2018/19 – 2020/21 provides a clearer steer towards this aim, but members were still unsure of how much impact this work would have. A suggestion the Committee had for improving the diversity of applicants' concerned recruitment activities that better engage with a diverse range of prospective candidates.

#### ***Recommendation 2 - That the Council explores opportunities to improve its engagement with the BAME population within Oxford through existing tools such as job fairs, for example.***

9. The Committee believes, as the report acknowledges, that there may be unconscious bias influencing the amount of BAME applicants that are recruited,

and that unconscious bias training would be welcome to address this. Unconscious bias may be having an influence on recruitment given that 19% of white applicants are appointed, but only 7% of BAME applicants are appointed.

10. The Committee also noted that there was an underrepresentation of women in senior roles within the Council’s workforce (excluding ODS), evidenced by there being a higher proportion of men in all positions graded 10 and above. The Committee advocated a greater focus on ensuring women were fairly represented within the senior officer recruitment process and ensuring that recruiters are appropriately briefed on this. The Committee welcomed assurances that in future, Councillors who sit on the Appointments Committee for senior appointments would be given appropriate training in relation to workforce representation.
11. In order to have a better understanding of unconscious bias within the organisation, it would be useful to gather feedback from people currently working for the organisation, and those planning to leave, on how they feel they have been treated. Do people feel that their protected characteristics (in particular race and gender) have in anyway disadvantaged them in their career with the Council?
12. The Committee note that for current employees, they may personally have doubts over whether providing such feedback may disadvantage them in their career, particularly in circumstances where they may be critical of their line manager for example. It is therefore suggested that mechanisms are put in place for people to provide this type of feedback in an anonymised way. The information gathered can then be used to help identify and overcome any barriers to recruitment and career progression for underrepresented groups.

***Recommendation 3 - That the Council ensures it has robust processes in place to gather feedback from employees who are leaving the organisation, and whether their treatment in relation to any protected characteristics was a factor in their decision to leave. Consideration should also be given to facilitating a ‘safe space’ where current employees can feedback about sensitive employment matters, such as barriers experienced by under-represented groups.***

**Further consideration**

13. The Committee will continue to monitor workforce equalities data annually.

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**Appendix 1 – City Executive Board response to recommendations of the Scrutiny Committee made on 6 November 2018 concerning Workplace Equalities**

**Draft response provided by the Board Member for Customer Focussed Services**

<b>Recommendation</b>	<b>Agree?</b>	<b>Comment</b>
Recommendation 1 - That the Council does not differentiate between Catholics and Christians in its workforce equalities data.	Agreed	The technical aspects of changing the categories available for applicants to select from will be explored with the platform provider and the data reported going forwards relating to religious belief will be amended accordingly.
Recommendation 2 - That the Council explores opportunities to improve its engagement with the BAME population within Oxford, through existing means such as recruitment fairs, for example.	Agreed	This will be taken forward as part of the action plan for 2018.
Recommendation 3 - That the Council ensures it has robust processes in place to gather feedback from employees who are leaving the organisation, and whether their treatment in relation to any protected characteristics was a factor in their decision to leave. Consideration should also be given to facilitating a 'safe space' where current employees can feedback about sensitive employment matters, such as barriers experienced by under-represented groups.	Agreed	<p>A revised exit interview process, based on a face to face discussion with a member of the HR team, will be implemented in the New Year. Feedback on the data trends from the new exit interview process will form part of the update to Scrutiny next year.</p> <p>Current policies and procedures provide a confidential pathway for staff to raise such concerns, either through trade union representatives or to HR directly, in a supported and safe environment.</p> <p>In addition a Staff Reference Group will be established shortly where such feedback and perceived or actual barriers can be discussed.</p>

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