

Agenda

www.oxford.gov.uk



Scrutiny Committee

This meeting will be held on:

Date: **Tuesday 30 June 2026**

Time: **6.00 pm**

Place: **Long Room - Oxford Town Hall**

For further information please contact:

Jonathan Malton, Committee and Member Services Manager

☎ 07485 396185

✉ DemocraticServices@oxford.gov.uk

Members of the public can attend to observe this meeting and.

- may register in advance to speak to the committee in accordance with the [committee's rules](#)
- may record all or part of the meeting in accordance with the Council's [protocol](#)

Information about speaking and recording is set out in the agenda and on the [website](#)

Please contact the Committee Services Officer to register to speak; to discuss recording the meeting; or with any other queries.

View or subscribe to updates for agendas, reports and minutes at mycouncil.oxford.gov.uk.

All public papers are available from the calendar link to this meeting once published

Committee Membership

Councillors: Membership 12: Quorum 4 substitutes are permitted.

Councillor Alex Powell (Chair)

Councillor Mohammed Altaf-Khan

Councillor Mohammed Azad

Councillor Tiago Corais

Councillor Chris Jarvis

Councillor Simon Ottino (Vice-Chair)

Councillor Asima Qayyum

Councillor Anne Stares

Councillor Trish Elphinstone

Councillor Siobhan Lancaster

Councillor Dr. Max Morris

Councillor Elizabeth Turkson Wood

Apologies and notification of substitutes received before the publication are shown under *Apologies for absence* in the agenda. Those sent after publication will be reported at the meeting. Substitutes for the Chair and Vice-chair do not take on these roles.

Agenda

	Pages
1 Apologies for absence	
2 Declarations of interest	
3 Chair's Announcements	
4 Minutes of the previous meeting	9 - 12
<p>The Committee is asked to approve the minutes of the meeting held on 9 June 2026 as a true and accurate record.</p>	
5 Addresses by members of the public	
<p>Public addresses relating to matters of business for this agenda. Up to five minutes is available for each public address.</p> <p>The request to speak accompanied by the full text of the address must be received by the Director of Law, Governance and Strategy by 5.00 pm on Wednesday 24 June 2026.</p>	
6 Councillor addresses on any item for discussion on the Scrutiny agenda	
<p>Councillor addresses relating to matters of business for this agenda. Up to five minutes is available for each address.</p> <p>The request should be received by the Director of Law, Governance and Strategy by 5.00 pm on Wednesday 24 June 2026.</p>	
7 Annual Review of the Council of Sanctuary Framework 2025-2028 (Report for Cabinet)	13 - 94
<p>Cabinet, at its meeting on 8 July 2026, will consider a report outlining the progress made in Year 1 to implement the Council of Sanctuary</p>	

Framework and Action Plan and plans for delivery in the next year. The report also seeks approval for the adoption of the new Framework Action Plan for Year 2.

The Committee is asked to consider the report and agree any recommendations.

8 Private Sector Housing Enforcement Policy (Report for Cabinet)

95 - 130

Cabinet, at its meeting on 8 July 2026, will consider a report which seeks approval for the Private Sector Housing Enforcement Policy.

The Committee is asked to consider the report and agree any recommendations.

9 Scrutiny Work Plan

The Work Plan is driven to a very large extent by the [Cabinet Forward Plan](#). The Scrutiny Committee agrees its priorities for items coming onto the Forward Plan, which then form part of its Work Plan.

The Committee is recommended to confirm its agreement to the Work Plan, or agree any amendments as required.

This item will be published as a supplement.

10 Cabinet responses to Scrutiny recommendations

131 -
134

At its meeting on 17 June 2026, Cabinet considered the following reports from Scrutiny and made no response:

- Establishment of the Scrutiny Standing Working Groups and Review Group

The Committee is asked to:

1. **Note** Cabinet's responses to its recommendations.

11 Endorsement of Recommendations from Working Groups

Since the Scrutiny Committee's previous meeting on 9 June 2026, the following Working Groups have met:

- Finance and Performance Working Group on 16 June 2026
- Housing and Homelessness Working Group on 23 June 2026

The Committee is asked to:

1. **Endorse** the recommendations from Working Groups.

This item will be published as a supplement.

12 Dates of future meetings

- 11 August 2026
- 8 September 2026
- 13 October 2026
- 10 November 2026
- 1 December 2026

All meetings start at 6:00 pm.

Information for those attending

Recording and reporting on meetings held in public

Members of public and press can record, or report in other ways, the parts of the meeting open to the public. You are not required to indicate in advance but it helps if you notify the Committee Services Officer prior to the meeting so that they can inform the Chair and direct you to the best place to record.

The Council asks those recording the meeting:

- To follow the protocol which can be found on the Council's [website](#)
- Not to disturb or disrupt the meeting
- Not to edit the recording in a way that could lead to misinterpretation of the proceedings. This includes not editing an image or views expressed in a way that may ridicule or show a lack of respect towards those being recorded.
- To avoid recording members of the public present, even inadvertently, unless they are addressing the meeting.

Please be aware that you may be recorded during your speech and any follow-up. If you are attending please be aware that recording may take place and that you may be inadvertently included in these.

The Chair of the meeting has absolute discretion to suspend or terminate any activities that in his or her opinion are disruptive.

Councillors declaring interests

General duty

You must declare any disclosable pecuniary interests when the meeting reaches the item on the agenda headed "Declarations of Interest" or as soon as it becomes apparent to you.

What is a disclosable pecuniary interest?

Disclosable pecuniary interests relate to your* employment; sponsorship (ie payment for expenses incurred by you in carrying out your duties as a councillor or towards your election expenses); contracts; land in the Council's area; licenses for land in the Council's area; corporate tenancies; and securities. These declarations must be recorded in each councillor's Register of Interests which is publicly available on the Council's website.

Declaring an interest

Where any matter disclosed in your Register of Interests is being considered at a meeting, you must declare that you have an interest. You should also disclose the nature as well as the existence of the interest. If you have a disclosable pecuniary interest, after having declared it at the meeting you must not participate in discussion or voting on the item and must withdraw from the meeting whilst the matter is discussed.

Members' Code of Conduct and public perception

Even if you do not have a disclosable pecuniary interest in a matter, the Members' Code of Conduct says that a member "must serve only the public interest and must never improperly confer an advantage or disadvantage on any person including yourself" and that "you must not place yourself in situations where your honesty and integrity may be questioned". The matter of interests must be viewed within the context of the Code as a whole and regard should continue to be paid to the perception of the public.

*Disclosable pecuniary interests that must be declared are not only those of the member her or himself but also those member's spouse, civil partner or person they are living with as husband or wife or as if they were civil partners.

Minutes of a meeting of the Scrutiny Committee on Tuesday 9 June 2026

www.oxford.gov.uk



Committee members present:

Councillor Powell

Councillor Azad

Councillor Jarvis

Councillor Stares

Councillor Lancaster

Councillor Turkson Wood

Councillor Altaf-Khan

Councillor Corais

Councillor Ottino

Councillor Elphinstone

Councillor Max Morris

Officers present for all or part of the meeting:

Jonathan Malton, Committee and Member Services Manager

Dr Brenda McCollum, Committee and Member Services

Apologies:

Councillor Qayyum sent apologies. Councillors Turkson Wood, Corais, and Altaf-Khan sent apologies for a late arrival.

1. Election of Chair for the Council Year 2026/27

Councillor Ottino nominated Councillor Powell for the position of Chair, and this was seconded by Councillor Jarvis. Councillor Powell was elected to the role of Chair of Scrutiny.

2. Election of Vice-Chair for Council Year 2026/27

Councillor Jarvis nominated Councillor Ottino for the position of Vice-Chair, and this was seconded by Councillor Morris. Councillor Ottino was elected to the role of Vice-Chair.

3. Declarations of interest

There were no declarations of interest made.

4. Chair's Announcements

Councillor Powell thanked the Committee for his re-election to the position of Chair.

5. Minutes of the previous meeting

The Committee resolved to **approve** the minutes of the meeting held on 07 April 2026 as a true and accurate record.

6. Addresses by members of the public

None received.

7. Councillor addresses on any item for discussion on the Scrutiny agenda

None.

8. Establishment of the Scrutiny Standing Working Groups and Review Group

The Director of Law, Governance and Strategy had submitted a report to establish Working Groups and Review Groups for the 2026/27 municipal year and appoint standing Working Group and Review Group membership and chairs.

Councillor Powell presented the report to the Committee and outlined the different working groups of the Scrutiny Committee.

The Scrutiny Committee resolved to:

1. Agree to establish the following working groups for the 2026/27 municipal year with the following remits:

- a) Finance and Performance Working Group – finance and budgetary issues and decisions, annual review of the Council's budget, quarterly monitoring of finance and performance (including performance of the Council's companies), executive decisions made in relation to any companies wholly or partly owned by the Council.
- b) Housing and Homelessness Working Group – strategic housing and landlord issues and decisions, homelessness, housing services performance and interaction with the Tenant's Forum.
- c) Climate and Environment Working Group – climate and environmental issues and decisions, progress and performance monitoring, monitoring delivery of existing strategies, policies and projects.

2. Agree the Terms of Reference for:

- a) Climate and Environment Working Group at Appendix 1
- b) Finance and Performance Working Group at Appendix 2
- c) Housing and Homelessness Working Group at Appendix 3

3. Agree to appoint members and chairs of the Finance and Performance, Housing and Homelessness, and Climate and Environment Working Groups or any other working groups as agreed by the Committee in accordance with nominations made by political groups.

- a. **Finance and Performance:** Cllrs James Fry, James Thorniley, Chris Smowton (Chair), Ian Yeatman
- b. **Housing and Homelessness:** Cllrs Lizzy Diggins, Rosie Rawle (Chair), Roz Smith, Anne Stares
- c. **Climate and Environment:** Cllrs Louise Upton, Chris Jarvis (Chair), Katherine Miles, Judith Harley

4. Agree to establish a Budget Review Group, comprising the membership of the Finance and Performance Working Group and **note** that the proposed scope and Terms of Reference will be agreed at a future Scrutiny Committee meeting.

5. Agree the schedule of meetings as presented within the report;

9. Scrutiny Work Plan

The Chair presented the report. The Committee **approved** the workplan.

10. Cabinet responses to Scrutiny recommendations

The Chair provided a summary of Cabinet's responses to the Committee's previous recommendations, as set out in the report.

Councillor Ottino expressed disappointment in the Cabinet's response to the flooding and watercourses issue that had raised. He asked how they could request a fuller response from Cabinet on this issue.

The Committee agreed that Councillor Powell would ask the Cabinet member for more details and for a timeline on the issue. The Committee agreed to add further consideration of this issue into their workplan.

The Committee discussed Cabinet's response to the CIL spending and pricing list. The Committee and Member Services Manager clarified that it was difficult for them to provide a ballpark figure on the projects done through CIL and ward member spends because they are all bespoke and quite different from one another. The Committee discussed how it was possible to fund bigger projects and clarified that they should reach out to the director of planning for these applications.

The Committee agreed that Councillor Powell would reach out to Cabinet in the areas where they had not provided a clear response.

The Committee **noted** Cabinet’s responses to its recommendations.

*Councillor Corais arrived during this item at 18:08.
Councillor Turkson Wood arrived during this item at 18:13.*

11. Endorsement of Recommendations from Working Groups

The Committee noted that since the Scrutiny Committee’s previous meeting on 7 April 2026 there had been no further recommendations made by the Working Groups which required endorsement.

12. Dates of future meetings

The Committee **noted** the dates of future meetings.

Councillor Altaf-Khan arrived during this item at 18:15

The meeting started at 18:00 and ended at 18:15.

Chair

Date: Tuesday 30 June 2026

*When decisions take effect:
Cabinet: after the call-in and review period has expired
Planning Committees: after the call-in and review period has expired and the formal decision notice is issued
All other committees: immediately.
Details are in the Council’s Constitution.*

To: Cabinet
Date: 8 July 2026
Report of: Director of Housing
Title of Report: Annual review of the Council of Sanctuary Framework, 2025-2028

Summary and recommendations	
Decision being taken:	To provide an update on the progress made in Year 1 of the Council of Sanctuary Framework 2025-28 and to seek approval for the implementation of the Year 2 Action Plan
Key decision:	No
Cabinet Member:	Councillor Linda Smith, Cabinet Member for Housing and Communities
Corporate Priority:	Support Thriving Communities
Policy Framework:	Thriving Communities Strategy 2023-27, Council of Sanctuary Framework 2025-2028

Recommendation(s): That Cabinet resolves to:	
1.	Note the progress made in Year 1 to implement the Council of Sanctuary Framework and Action Plan and the emerging risks and challenges for delivery over the next year and beyond
2.	Approve the adoption of the new Framework Action Plan for Year 2 (26-27); and
3.	Delegate authority to the Director of Housing, in consultation with the Cabinet Member for Housing and Communities, to update the Action Plan when required to respond to emerging risks and challenges.

Information Exempt from Publication
None

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Council of Sanctuary Framework	No

Appendix 2	Risk Register	No
Appendix 3	Equalities Impact Assessment (Updated)	No
Appendix 4	Year 1 Action Plan with rag rating	No
Appendix 5	Year 2 Draft Action Plan	No
Appendix 6	KPI table	No

Introduction and background

1. The Council has a proud track record of welcoming people seeking sanctuary who make Oxford their home and achieved Local Authority of Sanctuary award status in November 2024 which delivered a key action within the Council's Thriving Communities Strategy 2023-27. The *Sanctuary Awards* are provided by the network of local groups and City of Sanctuary UK, to recognise and celebrate the commitment by institutions to the charity's values and vision and enable those institutions to become active participants in the City of Sanctuary network.
2. Officers presented the Council of Sanctuary Framework and Action Plan 2025-2028 to Cabinet in January 2025 for approval. The Framework was developed with residents, staff and external partners and sets out how the Council will seek to support people seeking sanctuary over the next 3 years.
3. It was agreed by Cabinet that officers would report back annually on progress made against the action plan. This report sets out progress and challenges against the planned actions over the past year. The report also seeks approval for the updated action plan to be approved for year 2, updated to address emerging challenges.
4. The Council continues to provide support to people arriving on government backed refugee resettlement schemes through its corporate commitment, as well as visa schemes such as Home for Ukraine to settle and rebuild their lives. The Council has developed additional programmes to facilitate move on for people residing in and exiting from Home Office accommodation, supporting wider corporate aims to prevent homelessness.
5. To ensure this report is inclusive of the broad range of legal statuses, living circumstances and experience of migration, the Council has chosen to use the interchangeable term 'people seeking sanctuary' in this report which represents people that are from a forced displacement background including asylum seekers, refugees and vulnerable migrants.

Council of Sanctuary Framework and Action Plan

6. The Framework committed the Council to work in collaboration with the sanctuary community to inform and develop a Local Authority City of Sanctuary Action Plan and ensure the Council meets its commitment to become an accredited local authority of sanctuary.

7. As part of the process to achieve the *Council of Sanctuary Award*, the Council developed an Action Plan and commissioned a needs assessment which was produced in early 2024 which engaged over 100 people seeking sanctuary and support agencies and can be found via this [web link](#). The full Framework document and action plan can be found at **Appendix 1**.
8. Whilst there have been challenges, most acutely linked to nation-wide protests and community cohesion in summer 2025, there has been a lot of progress towards meeting the Year 1 actions embedded within the Action Plan which could be found in **Appendix 4** with a full rag rating.
9. Below is a summary of the thematic Action Plan areas and Year 1 progress and updates:

➤ **Wellbeing, Education and Employment**

10. Employment is a key driver in improving financial and housing prospects and the Council have been involved in several work strands to boost employability prospects for people seeking sanctuary. The Council's Youth Ambition Team is delivering employability advice for people moving on from Home Office accommodation including a drop in service and one to one support including CV writing, confidence building and job searches with at least 40 people engaging with the service which will continue into financial year 2026/27.
11. Addressing structural barriers has also been a clear objective. The Council has worked with the Oxfordshire Inclusive Economy Partnership (OIEP) which has developed its webpage to include improved guidance for employers when hiring refugees and are also working with an Oxford based academic (from the University of Southampton) to produce a policy briefing for the evaluation for the Refugee Employment Support Project (RESP).
12. Health and wellbeing is a key area of focus, with the Council utilising grant funding to support improved health outcomes. Examples include the Resettlement Team providing support for households who have arrived under government backed schemes to access therapeutic counselling for individuals via local health charity Refugee Resource.
13. The Council is also part funding an Oxfordshire Asylum Seeker Care Co-ordinator (ASCC) whose role supports improved early intervention for asylum seekers in Oxfordshire with 277 individuals supported in 2025/26 on key areas such as GP registration, vaccination catch up, health checks, NHS app registrations and advocacy to support access to required health care.
14. English for Speakers of Other Languages (ESOL) is a programme that addresses critical need and supports access to employment, volunteering and other education courses. All families resettled by Oxford City Council (in Oxford through the government backed resettlement schemes) are offered ESOL support under the commissioned wraparound support contract that Oxford City Council commissions with Asylum Welcome which is in its 3rd Year, delivering over 200 hours of ESOL to resettlement families. The City Council has also worked closely with Oxfordshire County Council to promote ESOL helping to facilitate learning across Oxford.
15. The Council has supported the Schools Advocacy Programme (delivered by Asylum Welcome) since 2021 which provides support for families to engage with local schools, helping children thrive and empowering parents to participate meaningfully in their children's education using volunteer mentors who work with families to help them

navigate the UK school system. Below is a case study from a participant in the programme demonstrating the impact that it can have:

Case Study – Parent participating in the programme

“The Schools Advocacy Programme has given us the gift of hope and opportunity, by helping us to support our children’s education and wellbeing in school. Every week, we are greeted with welcoming smiles and taken through the doors of the schools to meet mentors and teachers; people and surroundings that in the beginning were scary and unfamiliar, soon felt welcoming and safe.”

➤ **Housing and Homelessness**

16. The Council continues to utilise grant funding to support the prevention of homelessness in line with the Council Strategy and the Housing, Homelessness and Rough Sleeping Strategy. The Council’s Housing Services provides support for households to move on from Homes for Ukraine hosting, transitional accommodation and Home Office contracted contingency and dispersal accommodation, accepting homelessness duties in 100 cases.
17. The Council has supported at least 54 households in year 1 to move on successfully into independent housing from Home Office managed accommodation. This has been supported by the Council’s Procurement and Placement Team and Voluntary and Community Sector (VCS) partners who work with private landlords to increase the supply of private sector housing and also provide support to homelessness applicants the Council have a duty towards, who self-find private sector accommodation and the Council provides support via the first month’s rent and deposit.
18. Work is on-going to improve the quality of information provided to Oxford’s residents to assist them to navigate the UK housing system. For example housing advice leaflets that have been translated into 9 languages and produced alongside videos with translation; this can be found via the Council’s Youtube channel: [Finding a home if you are homeless](#)
19. The Council has delivered the Local Authority Housing Fund (LAHF) which, in the last 3 years has delivered 22 properties through direct purchases for temporary accommodation usage for homelessness households and resettlement groups including Ukrainian and Afghan households, adding to the Council’s wider housing portfolio and helping to prevent homelessness.
20. There has been a strong focus by the Council on rough sleeping with work to better track individuals who may come from a sanctuary background and are found to be rough sleeping by the Council’s commissioned outreach team. The Council’s Rough Sleeping Team is now recording this information in monthly reports, with overall reported numbers remaining low however spikes have occurred over the past year. Officers plan to analyse this data in year to understand if any further mitigations can be put in place.

➤ **Building Communities & Amplifying Voices**

21. A key objective of the Framework Action Plan has been to work in partnership to build community resilience and amplify voices. To facilitate this aim, the Council has continued to hold internal and external stakeholders group meetings quarterly to provide accountability to the Action Plan and improve the reach of the Action Plan across the Council and partner organisations.

22. Improved communication from updates to the refugee, asylum seeker and migrant web pages on the Council's website, and an enhanced translation tool has been implemented to aid navigation. There here have been intranet updates and lunch and learn interactive sessions for staff where people with lived experience have shared their experiences, including at the recent all staff conference.
23. Supporting residents to access positive activities has led to strong engagement with Council backed projects. For example, over 1000 people have accessed sporting sessions led by the Council's Communities Team to improve wellbeing, foster friendships and engagement with the local community. The Resettlement Team has worked with the Dancing Oxford project (organised by the Culture and Community Development Team) working with Pegasus Theatre company, Chameleon, to bring a refugee led dance show to Oxford with the focus on young sanctuary seekers.
24. The Museum of Oxford has several semi-permanent exhibitions which bring to life various groups' journeys to Oxford. Big Ideas grants have also recently been awarded to various sanctuary seeking support organisations e.g. Asylum Welcome, EMBS, Oxford Community Action, Oxford Hub, Refugee Resource, whilst recent small grants went to Damascus Rose Kitchen, Iranian Community Network, Oxfordshire Asian Women's Voice, Syrian Community Oxfordshire, Syrian Sisters, Iraqi Women Art and War and Tandem Oxford

Shaping Services

25. A key area within the needs assessment was to encourage people with lived experience to be more involved in the development of Council policy. Officers have undertaken several initiatives to put this into practice. A dedicated co-production section was incorporated into the new Citizen Engagement Policy. Several teams are actively involved in co-producing policies and initiatives, including the No Recourse to Public Fund (NRPF) protocol with Oxfordshire County Council and partners to develop a toolkit for advice if staff are working with individuals who have the NRPF condition which can be a significant barrier to accessing services. It is expected that this protocol will be finalised in autumn 2026.
26. Other key programmes include the NRPF Co-Production Group, which brings together residents who have the NRPF immigration condition to help create a resource for other residents. This is currently in development and expected to conclude in autumn 2026.
27. The Community Champion programme, made up largely of individuals who have sought sanctuary in Oxford, demonstrates exceptional expertise in co-production. It has been instrumental in amplifying underrepresented voices through achievements such as creating multilingual resources (including a GP receptionist animation in six languages and a Healthwatch video on language support), leading community events like Black History Month and a Men's Health football tournament, and producing a Community Cookbook showcasing lived experiences. In addition, it has influenced key consultations on NHS plans, the Council's anti-social behaviour policy, and citizens' experience surveys, contributing 223 insights into health barriers and engaging 2,845 individuals across diverse communities.

Supporting Integration

28. The Council continues to support resettlement from government backed resettlement schemes namely the United Kingdom Resettlement Scheme (UKRS) and Afghan Resettlement Programme (ARP). In 2025, the Council resettled 8 new families (15 adults and 21 children). A total of 32 families were supported during the year. Delivery includes end-to-end coordination, procuring suitable and affordable accommodation, which is predominantly in the private sector, to commissioning intensive wrap-around support through Asylum Welcome.
29. The Council continues to support residents under the Homes for Ukraine scheme. There are now around 44 hosting arrangements and many other households have moved onto independent accommodation. A specialist Early Intervention and Triage Officer delivers statutory housing support alongside upstream prevention and post-tenancy sign-up assistance. The Homes for Ukraine Rematching Team works county-wide to prevent homelessness and ensure residents are connected to appropriate, holistic support.
30. The Council continues to commission holistic support for people granted refugee status and moving on from dispersal accommodation. For example, from January – March 2026, the Council's commissioned partner saw 221 clients (including 56 new arrivals) across 24 drop-in sessions to support with upstream housing advice, health and wellbeing referrals, signposting to legal advice and practical support. The Council attends drop-in sessions to support homelessness applications and housing advice for people moving on from Home Office contracted accommodation and saw 219 individuals in 25/26.
31. The Helping Hands initiative is a regular litter pick around the contingency hotel, which houses people claiming asylum and managed by Home Office contractor, increasing engagement with the local community. Volunteers at the Oxford Homeless Project Hotel have regularly served meals, packed food parcels, and offer services such as free haircuts. The Council has also commissioned. The Sundial Centre has also undertaken cultural awareness workshops for people seeking sanctuary.

Working in Partnership & Innovating

32. A key element of the Action Plan is to work in partnership with local organisations, leveraging skills and capacity to widen reach and outcomes for people seeking sanctuary. The Council is currently working with Oxford Brookes University and the University of Oxford on two research projects with a focus on welcoming
33. The Council is developing a "*Basics of Sanctuary*" e-learner module, in partnership with Oxfordshire County Council and Oxford Brookes University, and the aim is for it to be a stand-alone training module on the county wide Oxfordshire Safeguarding Board platforms in perpetuity. This can then be accessed by all agencies within Oxfordshire.
34. The Council continues to engage with local partners via the county-wide Oxfordshire Migration Partnership. It is noted that other local authorities in Oxfordshire such as Oxfordshire County Council and West Oxfordshire District Council have passed Council motions and have also committed to becoming Local Authorities of Sanctuary and grow the sanctuary movement locally. The partnership includes statutory partners such as the NHS and Thames Valley Police and other voluntary and community sector partners such

as Connection Support which deliver the Homes for Ukraine wraparound support contract commissioned by Oxfordshire County Council.

Sanctuary KPI's

35. One of the accepted recommendations from the Scrutiny Committee when it considered the Framework, was to set clear performance measures as part of the Action Plan. Officers have developed individual measures of success against the actions and created overarching KPI's for this Action Plan. These can be found in **Appendix 6**.

Year 2 Framework Action Plan

36. In light of progress against the Year 1 Action Plan, and respond to new challenges, a new Year 2 Action Plan has been developed, updating the current Action Plan after consideration of progress and to ensure the priorities are adapted to the emerging challenges. The new Action Plan for Year 2 can be found in **Appendix 5 and cabinet are asked to adopt the new Action Plan to progress the work for the financial year 26/27**.
37. The Action Plan will be reviewed regularly to monitor and report on progress against commitments in the Framework. To ensure it can respond quickly to emerging priorities and risks, approval to revise the plan throughout the Year as required in consultation with the Cabinet Member for Housing and Communities is sought.

Financial implications

38. This report is not requesting any additional budget allocation to deliver the Framework and funding has been set aside to support this from a historic grant programme which support migrants and this will be used alongside other existing government grants to the Council to support people seeking sanctuary to deliver the direct aspects of the Framework over 3 years.
39. The Council estimates that the grant funding mentioned above will be sufficient for the direct delivery of aspects of the Framework that the Council is responsible for. If additional costs are forecast, through regular financial management and monitoring or otherwise, then these will be considered as part of the normal Council budget governance process. Other elements of the Framework may require applications to be made for external investment from partnership organisations from other parts of the public sector.

Legal issues

40. The Council is committed to upholding the principles of the Public Sector Equality Duty (PSED) as outlined in the Equality Act 2010. To fulfil this commitment, the Council will have due regard for the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct that is prohibited by or under the Act;

- Advance equality of opportunity between people who share a relevant protected characteristic and those who don't share it;
- Foster good relations between people who share a relevant protected characteristic and those who do not (which involves having due regard, in particular, to the need to tackle prejudice and promote understanding).

41. The Council of Sanctuary Framework document and Action Plan aim to fulfil the principles set out in the Equality Act relating to the PSED. Any required improvements to the Framework or the Action Plan will be implemented to ensure the Council creates a supportive environment where all residents can feel secure, respected, and empowered to thrive.

42. The proposed Framework and Action Plan aim to support individuals of all backgrounds, collaborate with local organisations and communities, and the Council will actively consider the diverse needs of all residents to foster a city that is inclusive, welcoming and supportive.

Level of risk

43. See Risk Register attached under **Appendix 2**.

Equalities impact

44. An equality impact assessment was completed as part of the Council of Sanctuary Framework 2025-2028, and this has been updated for this cabinet paper and can be found in **Appendix 3**.

45. A number of actions in the Year 2 Action Plan were set in relation to improving the delivery of the Strategy and in relation to individuals or groups with a protected characteristic and in relation to delivering actions related to equalities, diversity and inclusion (EDI).

Implications of Local Government Reorganisation

46. Government guidance concerning LGR has been considered in relation to this report and there are no significant implications noted at this time. In future, strategy and framework documents will need to be considered by the successor Council to ensure alignment with Council priorities and requirements

Carbon and Environmental Considerations

47. There are few environmental considerations arising directly from this report. There is a need to continue to support residents to reduce their carbon imprint and support the corporate ambition to become a zero carbon Oxford. Any households that are resettled or helped into accommodation within private rented properties within the city which will be registered with the Council's selective licensing scheme which takes into consideration environmental impact.

Report author	Stephen Cohen
Job title	Refugee and Resettlement Manager
Service area or department	Housing Services
Telephone	07889 172942
e-mail	Scohen@oxford.gov.uk

Background Papers: None

Table 1: Glossary of terms:

Term	Description
Migrant	A person who moves from one country to another, for the primary purpose of work or study, or to reunite with family
Asylum Seeker	Individual who applies for protection as a refugee and who is still waiting for a decision on their claim for refugee status
Refugee	Someone who has had a positive decision on their asylum claim; they have been recognised as a refugee under the United Nations Convention. This means that they are recognised to have a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion in their country and are entitled to protection.
Resettled Refugee	a refugee who has been offered a permanent home in a country while still outside that country. The United Nations High Commissioner for Refugees (UNHCR) identify vulnerable refugees, who they deem in need of resettlement. Local authorities and community sponsors assist in resettlement.
Undocumented Migrant	Someone who does not possess the required (and correct) documents to enter, or remain, in the country
UASC or Unaccompanied Asylum-Seeking Child	A child who is outside their country of origin to seek asylum. They are separated from parents and relatives and are not in the care of someone who has parental responsibility. Locally, they are looked after by Oxfordshire County Council.
A Person on No Recourse to Public Funds (NRPF)	Someone who is not entitled to benefits because of their immigration status, e.g. an international student, someone on a spousal visa, a visa overstayer.

A Person Seeking Sanctuary/ Sanctuary seeker	A collective term that we use refer to everyone who is a refugee, asylum seeker, undocumented migrants, survivors of modern slavery or a person with a precarious immigration status e.g. on No Recourse to Public Funds (NRPF) and others who may not fit into any of these categories but are seeking safety and a place to rebuild their lives. In Oxford, we use this more inclusive term when talking about our sanctuary work.
---	--



COUNCIL OF
SANCTUARY AWARD
WELCOMING PEOPLE SEEKING SANCTUARY



OXFORD
CITY
COUNCIL



COUNCIL OF SANCTUARY FRAMEWORK 2025 - 2028



TABLE OF CONTENTS

- Foreword by Councillor Linda SmithPage 3
- Introduction and Background Page 4
- Our Progress – Key HighlightsPage 6
- Key ChallengesPage 9
- Partnerships and Governance Page 11
- Taking Action.....Page 13
- Sanctuary DataPage 22
- Key terms.....Page 25



Photograph by Keiko Ikeuchi, courtesy of Iraqi Women Art and War (IWAW)

FOREWORD BY

COUNCILLOR LINDA SMITH

Oxford is a global City which has a proud history of migration adding a rich diversity to the City and I am proud that Oxford has been a *City of Sanctuary* for various groups over many years. There is a sense of solidarity and community, and the Council works tirelessly to create a thriving community which is inclusive and welcoming.

Since the first Council motion in 2019 where Councillors pledged support to make Oxford a *City of Sanctuary*, the Council has been on a journey to become an accredited Local Authority of Sanctuary. This has culminated in this framework and action plan which sets out the Council's plan for the next 3 years.

Our goal is to build on the Council's strengths while proactively identifying areas of need and addressing any gaps with effective solutions alongside our partners. The Council is fortunate to receive support and work in partnership with statutory and non-statutory partners from across the County via the Oxfordshire Migration Partnership.

A key aim of the Thriving Communities Strategy is the ethos of 'doing with, not to' residents. This framework builds on this philosophy, aiming to develop solutions alongside people with lived experience of seeking sanctuary, statutory services, voluntary and community partners as well as a range of Council services. We have identified the actions laid out in the action plan, across six priority areas. The priorities reflect both key areas of need and opportunities to empower people seeking sanctuary in line with our local strengths and existing strategies.

Unfortunately, in recent times, global conflict, and instability in places like Syria, Afghanistan and Ukraine has led the Council to redouble our efforts to provide an inclusive and welcoming environment to people seeking a safe place to call home. As the need has increased, so have issues such as central government asylum processing backlogs, and the block booking of budget hotels by the Home Office to provide basic accommodation for asylum seekers.

The Council has consistently supported programmes to support vulnerable groups in Oxford including refugees who have been resettled, ensuring that we play our part to support households in need. Whilst there is much more to do, I hope you will see from reading through this framework that there are many stories of success.



Cllr Linda Smith - Cabinet member for Housing and Communities

INTRODUCTION

AND BACKGROUND

This framework document has been developed through engagement with residents and key stakeholders, drawing on real-life experiences and learning from commissioned research. Our aim is to shape a comprehensive plan that enables Oxford City Council to work with partners to improve the outcomes for local people seeking sanctuary and the wider community. The document is organised into key sections, offering insights into the Council’s efforts to support this area of work and the journey the Council has been on.

Many people come to Oxford in search of sanctuary, support, or a warm welcome. To ensure we are inclusive of the broad range of legal statuses, living circumstances and experience of migration held by these residents we choose to use the term ‘people seeking sanctuary’ throughout this framework. Where certain conditions, criteria or experiences only apply to subsections of this population we include specific reference to this in the pages below.

Our vision for Oxford City Council as a local authority of sanctuary is to create a welcoming and safe environment where those seeking sanctuary feel supported, accepted, and embraced as part of the broader community. A city where all residents can thrive, contribute, and actively participate in the community, helping to shape the future and enrich the life of Oxford for all.

Windows painting created by the residents of local asylum hotels, supported by Iraqi Women Art and War, hosted by the Museum of Oxford and displayed at Oxford Town Hall for Refugee Week, 2024



Oxford has long been a destination for international migrants, be it for work or study, bringing valuable skills and knowledge and making the city diverse and global. Two world reputed universities, globally renowned science parks, sizeable teaching and practicing hospital systems, and large technology and automobile industries provide opportunities for economic and social mobility for many far and wide.

Oxford has also been a place where people have settled after seeking safety and security. Oxford City Council has consistently supported refugee resettlement and integration against a backdrop of growing need both locally and internationally.

Oxford City Council passed the first motion to be a *City of Sanctuary* in 2019, followed up in 2022 when the Council passed a further motion to consider the support on offer to people seeking sanctuary in the light of recent global conflicts.

Oxford City Council committed to becoming a local authority of sanctuary in 2023 and develop an action plan to set out how it will work with people seeking sanctuary over the next three years. This is set out in this framework document alongside key areas of progress, challenge, as well as quotes from community voices detailing their experience of sanctuary in Oxford.



OUR PROGRESS -

KEY HIGHLIGHTS

Oxford City Council has made notable progress and reached significant milestones on its journey to becoming a local authority of sanctuary in recent years, achievements made possible through the continued support from partners as outlined below:

2016

In 2016 Refugee Resource

was commissioned to provide additional mental health support for resettlement families, offering specialised counselling and therapeutic mentoring. This vital service has been continuously maintained to ensure ongoing support for those in need.

2017

In 2017 The Museum of Oxford

hosted the Journeys to Oxford exhibition telling migrants' tale of how they got here. This included the testimonies of about 115 Oxford City residents of 45 different nationalities, from Poland to Pakistan and China to the Caribbean.

2018

In 2018 the Council secured funding through the Controlled Migration Fund which led to a number of projects including commissioning local charities to establish a local mentoring and volunteering program for people seeking sanctuary, work based-ESOL classes, further human trafficking and modern slavery research and a project supporting rough sleepers.

2020

The **Schools Advocacy Programme**, run by Asylum Welcome and funded by Oxford City Council since 2020, helps families and schools by improving engagement, access to educational services, and understanding of the UK school system. So far, 105 children from 35 families across 25 schools have benefited, with schools describing the service as "invaluable" and "pivotal."

Oxford is the most welcoming place for people seeking sanctuary, and we are lucky to have very rich and wide cultures. Also, I feel very fortunate to be hosting those people in need. I have learnt a lot from them, and I admire their resilience



Community Voice: Kate has hosted and supported 25 sanctuary seekers in her home since 2015 under a charity run hosting scheme

For me Oxford is a place of safety and empowerment



Community Voice: Lubna, a mother from Iraq who came to Oxford in 2022 with her children to join her husband who was already in the UK. Since then, alongside bringing up her family, she has volunteered tirelessly in the community and become a community artist.

2022

The Oxfordshire Migration Partnership was established in 2022 in response to the Ukraine crisis to coordinate the Homes for Ukraine (HfU) scheme across local stakeholders. Oxford City Council collaborated with Oxfordshire County Council, along with district authorities and other partners. Key successes include pooling resources to expand housing options, preventing homelessness and commissioning projects for people seeking sanctuary and local residents.

2022

Since 2022, around 200 resettled individuals have undertaken ESOL tuition as part of the resettlement programmes and many more have been signposted to local mainstream community provision.

2023

In 2023, Oxford City Council commissioned Aspire Oxford, Asylum Welcome, Refugee Resource and EMBS college to run the **Refugee Employment Support Programme (RESP)**. Since then, 24 refugees have been supported and 51 employers engaged.

2022

In 2022, the City Council, in partnership with NHS services, launched the Community Health Champions initiative to support COVID-19 vaccination rollout for vulnerable communities. Ten people seeking sanctuary have been trained as Community Health Champions to improve healthcare access and promote wellbeing.

2024

In 2024 the Council funded the **Health Access Project**, run by Asylum Welcome, which has supported people seeking sanctuary with health and dental services and has developed a multilingual healthcare hub.





*Photograph by Keiko Ikeuchi,
courtesy of Iraqi Women Art
and War (IWAW)*

KEY CHALLENGES

Oxford has a resilient economy, world renowned higher education, science and research sector. However, there are high levels of inequality and Oxford has several areas of high deprivation where most local people seeking sanctuary reside. People seeking sanctuary face many barriers and challenges as they endeavour to rebuild their lives and make a new home. These challenges are exacerbated by global or national policies and pressures and are summarised below:

Global conflict / increased migration

[United Nations statistics](#) estimate over 120 million people were forcibly displaced by 2024. The majority are displaced internally or flee to neighbouring countries. A small percentage make their way to the UK. People seeking sanctuary arriving in Oxford are fleeing conflicts and persecution as well as environmental disasters, driven by climate change, alongside economic challenges, worsened by the COVID-19 pandemic.

National policy challenges

In 2022, Oxford became an expanded asylum dispersal area, leading to the use of temporary housing for asylum seekers. Government legislation has sought to act as a deterrent for people arriving through irregular routes and increased the requirements for an individual to claim asylum. There is variation in how the UK's responds to different crises, which has led to the creation of bespoke visa and resettlement schemes affecting rights and entitlements.

Cost of Living crisis

People seeking sanctuary in Oxford are deeply affected by the cost-of-living crisis, with rising energy costs pushing many into "fuel poverty." Limited income forces choices between essentials like heating and food. Language barriers and unrecognised qualifications make it hard to find stable jobs, while competition for low-wage work increases hardship. Children face difficulties as families struggle with school expenses whilst local charities struggle to meet the growing need.

Housing demand & supply/homelessness

Oxford is one of the least affordable UK cities, with high rents and a shortage of affordable housing. People seeking sanctuary, with limited financial resources, struggle to secure housing due to long social housing waitlists, lack of credit history, and private rental market access issues. After receiving refugee status, they must leave asylum support accommodation within 56 days, often risking homelessness.



For this initiative, I will hire refugees with limited experience and support them in starting their careers and improving their language skills. From my experience, language barriers are their biggest challenge. It's crucial to raise awareness of these issues and create more job opportunities so they can become self-sufficient and give back.

Community Voice: Hamza is keen to empower refugees by opening doors to work, language, and a brighter future.

Health inequalities

People seeking sanctuary face unique health challenges and barriers to healthcare due to lack of documentation, language difficulties, and confusion about eligibility. This limits access to primary care, mental health services, and preventive healthcare. Language barriers can lead to miscommunication, misdiagnoses, and inadequate treatment, especially for mental health needs. Poor housing and food insecurity contribute to health problems and women and children, particularly, face additional challenges.

No Recourse to Public Funds (NRPF) / vulnerable migrants

People with No Recourse to Public Funds (NRPF) in Oxford face severe challenges due to high living costs and limited support. Unable to access public housing or benefits, many risk homelessness or live in unsafe conditions, relying on overstretched charities. Employment can be restricted due to immigration status which can lead to exploitation in low-paying jobs without labour protections. Financial hardship is common, often leading to debt. Children in NRPF families also face barriers to accessing school meals and educational resources, affecting their well-being.

PARTNERSHIPS AND GOVERNANCE

The Council has set clear objectives outlined in the *Taking Action* section below. However, it remains impacted by broader financial challenges, as constrained local government finance has been impacted by tight central government settlements and rapidly rising costs. It is clear that the Council is not able to deliver on all its aspirations without working in partnership. This is very much the model the Council aspires to, as Oxford is fortunate to have a thriving voluntary and community sector and the Council also works in close collaboration with other statutory agencies including local Oxfordshire County Council, District Councils, and other partners such as the NHS via the Oxfordshire Migration Partnership.

Partnership work via the Oxfordshire Migration Partnership has increased the level of inter-agency working and allowed a more co-ordinated response to tackle emerging issues related to migration within Oxfordshire. The Council is keen to work in partnership with other agencies such as Oxfordshire County Council who have recently become an accredited Local Authority of Sanctuary and who lead on co-ordination for the Oxfordshire Migration Partnership.

Strong partnerships with different organisations like Asylum Welcome, Refugee Resource, Aspire Oxford and Connection Support and other community groups, have helped Oxford City Council widen its impact as it works together with its partners on new and innovative projects. The action plan embedded within this framework identifies key actions for the Council, other statutory agencies and the voluntary and community sector. It has been developed in partnership and reflects the understanding that better outcomes will be achieved if we work together to pool resources, knowledge, and expertise.

Based on close collaborations with lived experience organisations the Council has been actively involved in providing more inclusive and holistic support for people seeking sanctuary. We are proud to celebrate refugee experiences through Refugee Week celebrations and the annual Sanctuary Fair. So, while we aim to do better with regards to our statutory duty, our overall approach and plan is to go beyond business as usual.



*Oxford Sanctuary Fair 2025:
Community as a Superpower.*

*Photograph courtesy of
Refugee Resource*



The Council will continue to show leadership by using grant funding to invest in staffing and new projects to support people seeking sanctuary. Alongside the Council's operational role, Oxford City Council officers will also advocate for a fair funding settlement from central government and seek to influence the direction of national policy.

Accountability for this action plan is important and Oxford City Council officers will be reporting back to Oxford City Council Cabinet on yearly progress. Progress will be tracked routinely through the Council's internal governance structures, reporting to the Communities Change Board monthly. Officers have developed internal and external sanctuary partnership groups who will also be meeting periodically to jointly assess progress and identify new key actions.



Photograph courtesy of Refugee Resource
32

TAKING ACTION

Oxford City Council has explored the views of people seeking sanctuary and the local community and what the Council can do to improve their experience. We began with the Thriving Communities Strategy Consultation where the voices of many local people sanctuary were recorded. The following year in October 2023, we commissioned Asylum Welcome to deliver a needs assessment for our Council of Sanctuary project and more recently carried out community engagement work, meeting local residents.

The needs assessment and our research explored the views of people seeking sanctuary including their experiences, and opinions on Oxford City Council services. Many positives were highlighted including the safety, beauty and reputation of the city, alongside the availability of cultural activities, outdoor space and friendly communities.

However, a number of barriers emerged, often linked to an individual’s immigration status and support needs, but they were connected by the common thread of trying to settle and rebuild lives in a new environment and place with different cultural, legal and societal norms.

The report grouped the key areas of challenge into four key themes: transport; health and wellbeing; education and employment; and accommodation. As the Council is not a unitary authority, some issues raised in the research fall within the remit of other partners we will work with partners to address these.

Where work cuts across other organisations provision, we have indicated in the action plan how we will work together to action the recommendations in the ethos of the partnership model. We have identified the actions across 6 priority areas, to be reviewed regularly with partners. The priorities reflect both key areas of need and opportunities to empower people seeking sanctuary in line with our local strengths and existing strategies and are listed below:



1. Wellbeing, Education and Employment

What are we going to do?	Service	By end of year
Educate and empower Oxford City Council teams and local businesses about opportunities to employ people seeking sanctuary and how to offer placements and apprenticeships, including through myth-busting on migrant entitlements with businesses as well as job brokers.	Regeneration and Economy	2025-2026
Evaluate the Refugee Employment Support Programme (RESP), its findings and respond to the recommendations. Explore opportunities for further work around employment, business support and social enterprise.	Housing Services	2025-2026
Work with the anti-slavery coordinator and local modern slavery network to promote understanding around rights and safeguarding risks faced by people seeking sanctuary locally.	Community Safety	2026-2027
Work with key partners to develop and extend the existing schools advocacy project, subject to project viability.	Housing Services	2025-2026
Improve access to wellbeing and leisure facilities for local people seeking sanctuary to improve health outcomes and reduce health inequalities.	Community Services	2026-2027
Work with partners including Refugee Resource to improve therapeutic outcomes for people seeking sanctuary.	Housing Services	2026-2027

2. Housing and Homelessness

What are we going to do?	Service	By end of year
Expand education and support for local people seeking sanctuary to help them navigate the housing system, especially for those experiencing homelessness, those at risk of homelessness, and those with limited experience of independent living (including UASC) in line with the Housing, Homelessness and Rough Sleeping Strategy.	Housing Services	2026-2027
Provide training as appropriate for housing colleagues on how to support people seeking sanctuary, e.g. residents with varying immigration status including victims of domestic abuse with no recourse to public funds.	Housing Services	2026-2027
Develop further training on working with refugees (cross cultural communications and trauma informed practice) and offer it to colleagues.	Housing Services	2026-2027
Increase engagement and support for landlords who wish to house people seeking sanctuary, including information and communication on the Oxford City Council's private rented housing access schemes.	Housing Services	2026-2027
Provide appropriate support to sustain tenancies as part of the Oxford City Council's approach to homelessness prevention and in line with the Housing, Homelessness, and Rough Sleeping Strategy.	Housing Services	2025-2026
Improve monitoring of the number of people seeking sanctuary who are sleeping rough and use intelligence to target support.	Housing Services	2025-2026

3. Building Communities and Amplifying Voices

What are we going to do?	Service	By end of year
Empower and support local institutions to become registered places of sanctuary including libraries, surgeries, arts organisations, community groups, colleges, and faith organisations.	Housing Services	2027-2028
Act as a lead Local Authority on joined-up campaigning for migrant rights, share learning and expertise through sanctuary networks at a local, regional, and national level including the City of Sanctuary Local Authority Network.	Housing Services	2027-2028
Continue to convene the Oxford City Council of sanctuary internal and external stakeholders' meetings to meet regularly to facilitate the Thriving Communities vision of "Doing with, not to" and advocate for an ethos and practice of 'Co-production'	Housing Services	2025-2026
<p>Support refugee partners and community groups to access opportunities in arts, culture, and community activity via the use of our facilities, grants, and external funding.</p> <ul style="list-style-type: none"> Collaborate with the local voluntary and community sector to build capacity and participation of local lived experience groups via funding advice and support. Develop effective pathways into volunteering and participation via social and cultural activities. 	Community Services	2026-2027
Build capacity of local sanctuary seeking community via Sanctuary Ambassadors programme and access to the Sanctuary in Politics course.	Housing Services	2027-2028
Support refugee community groups to access spaces and places where they can come together to enjoy common interests and create new friendships.	Community Services	2026-2027

4. Shaping Services

What are we going to do?	Service	By end of year
Develop/co-produce and share a sanctuary framework to support people seeking sanctuary and promote independent living for those staying in the City and beyond.	Housing Services	2025-2026
Review incorporation of sanctuary principles into services when strategies, policies or services are changed.	Corporate Strategy	2026-2027
Develop online resources to be more accessible for people seeking sanctuary including the Council's web page, the Communities Toolkit and information regarding accessing housing and other support	Housing, Communities and Customer Services	2026-2027
Create opportunities and space for people seeking sanctuary to have their voices heard and their stories told, so that their experiences can inform how services are delivered in the city. Ensure people seeking sanctuary can feed into Council activity through existing mechanisms.	Housing Services	2025-2026
Promote sanctuary informed practice across local strategic partnerships where Oxford City Council is key stakeholder.	Housing Services	2025-2026
Via the community health champions programme improve advocacy for people seeking sanctuary and access to primary health care for vulnerable and undocumented migrants.	Community Services	2025-2026

5. Supporting Integration

What are we going to do?	Service	By end of year
<p>Grow and publicise wider migrant-specific information, advice and guidance for all residents such as a Sanctuary Door initiative (Single Point of Contact), embedding opportunities for people with lived experiences to lead on service support.</p>	Housing Services	2025-2026
<p>Continue to support local people seeking sanctuary who settled under government schemes including UK resettlement scheme (UKRS), Afghan Resettlement scheme (ARAP, ACRS), Asylum Dispersal Scheme and Homes for Ukraine scheme in line with statutory duties, corporate objectives and viability requirements.</p>	Housing Services	2025-2026
<p>Support the Council's ambition to achieve the Domestic Abuse Housing Alliance (DAHA) accreditation and feed in from sanctuary seeking groups perspective.</p>	Regulatory Services and Community Safety	2027-2028
<p>Via sanctuary ambassadors programme and the external stakeholders group review availability of legal advice services for people seeking sanctuary. Alongside community partners, explore opportunities to support expansion of provision as well as pathways to access, and to provide residents with information about their rights.</p>	Housing Services	2026-2027

What are we going to do?

Service

By end of year

Work alongside the Oxford Food Hub and other local charities to raise awareness of free or low-cost food options for people seeking sanctuary, in relation to accessing food, and engaging in the wider local food system and increasing communication to ensure people seeking sanctuary are aware.

Housing services supported by Communities

2026-2027

Produce a joint calendar of events which promote integration and support sanctuary events such as during Refugee week.

Housing services supported by Communities

2025-2026



39 *Photograph courtesy of Refugee Resource*

6. Working in Partnership and Innovating

What are we going to do?	Service	<i>By end of year</i>
Support local research bodies to (a) create and develop a body of evidence demonstrating the positive impact of people seeking sanctuary locally and (b) analyse the benefits and opportunities they bring.	Council of Sanctuary external stakeholders' group	2027-2028
Support Oxfordshire County Council and other key partners to increase English language provision (ESOL) accessibility to those with different immigration status, ages, childcare provision needs or access needs in a wide range of both statutory and community settings across the City.	Oxfordshire County Council	2026-2027
Support the Getting Oxfordshire Online Digital Inclusion network, to bring together partners to identify digital barriers for refugees and asylum seekers in the City / county and promote greater digital inclusion for this group.	Oxfordshire County Council supported by the CoS external stakeholders' group.	2025-2026
Collaborate with local partners and individuals seeking sanctuary to develop culturally appropriate and accessible health initiatives, with a strong focus on expanding access to mental health support. Engage with relevant charities and public services to explore and enhance support networks and resources.	Council of Sanctuary external stakeholders' group	2027-2028

What are we going to do?

Service

By end of year

Review existing support available to people with No Recourse to Public Funds (NRPF) via the establishment of an NRPF working group with Oxfordshire County Council and local VCS.

Council of Sanctuary external stakeholders' group

2025-2026

Alongside partners, work to ensure asylum seekers have access to low affordable public transport and travel around the city.

Oxfordshire County Council

2026-2027



If you hardly speak English and you are a stranger in a foreign culture it's like being blind and deaf when you want to talk to someone. Before they helped me, I felt powerless and invisible. Now I have a voice, and I can help others like me.

Community Voice: HB from Syria

Photograph courtesy of Oxford School of English

SANCTUARY DATA

The 2021 Census showed that 35% of Oxford’s population was born outside the UK, compared to 28% in the 2011 Census. Most of the foreign-born population have come to Oxford for work or study. There have been significant changes in the demographic population of Oxford City recently especially since 2022. A combination of wide-ranging changes to national policy and external factors (e.g., the war in Syria and Ukraine, political unrest in Afghanistan and Hong Kong) have facilitated this.

As a Council we have had to respond quickly not only to an increasing number of people seeking sanctuary living locally, but also to understand how the different immigration statuses these individuals hold affect their experiences and their entitlements. We have had to adapt our services accordingly and we have recorded some key sanctuary data for Oxford:



Data on people seeking sanctuary in Oxford can be limited or held by different authorities. People seeking sanctuary are not continuously tracked or recorded in the wider system beyond their initial grant of status, making their needs as trauma-affected, newly arrived individuals often unrecognised and unmet. For those who work with them, gathering reliable information is challenging due to instability in their lives, long asylum processing times, frequent relocations, and homelessness.

Some groups are particularly under-documented, including no recourse to public funds (NRPF) women on spousal visas, students claiming asylum because of a well-founded fear of persecution, and those trapped in domestic servitude or debt bondage. This lack of data hampers effective support, service provision and requires work with other agencies to understand data on marginalised groups residing in Oxford which we intend on progressing as part of the council's action plan.



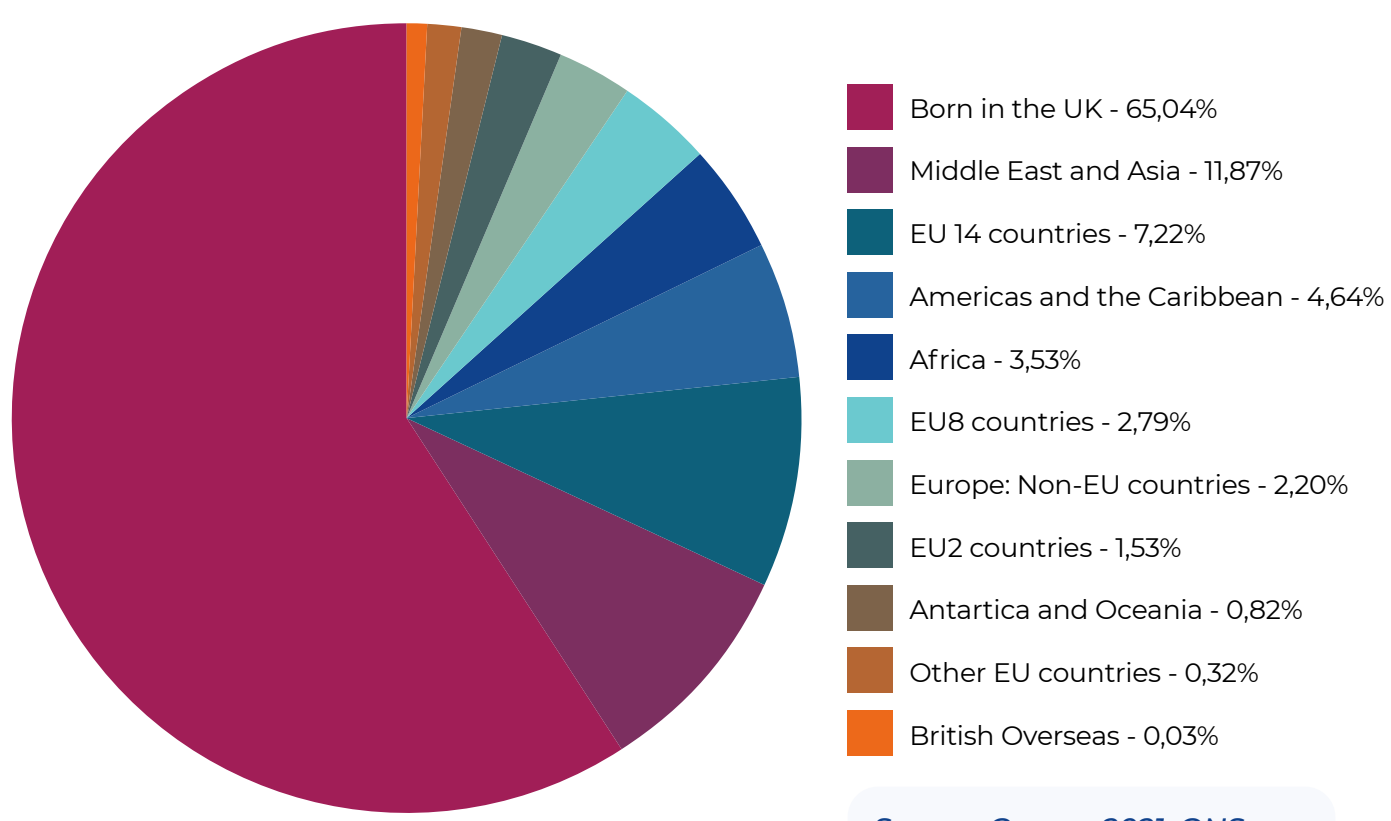
Photograph courtesy of Refugee Resource



Oxford City Council has access to general data sets and the below information was compiled by the council's **Business Intelligence Unit** for this framework document taken from the Census 2021, Office for National Statistics (ONS).

Oxford Resident's Country of Birth

A way of understanding the composition of Oxford's residents, regarding ethnicity and nationality is the resident's place of birth. The following graph shows the distribution of countries of birth.



Source: Census 2021, ONS.

Note: The EU14 includes the member countries of the European Union before the 2004 expansion: Austria, Belgium, Denmark, Finland, France, Germany, Greece, Ireland, Italy, Luxembourg, Netherlands, Portugal, Spain, and Sweden. The EU8 refers to the countries that joined the EU in 2004, which are Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, and Slovenia. Lastly, the EU2 consists of Bulgaria and Romania, which joined the EU in 2007.

Considering only the 34.92% of people that was not born in the UK and British Overseas (taking aside the 65.04% and 0.04% respectively), the following visual shows the distribution among the rest of the countries where Oxford Residents were born.

KEY TERMS

- **Asylum seeker:** In the UK, a person who is seeking asylum or sanctuary is known as an asylum seeker because they have:
 - fled their home
 - arrived in another country, whichever way they can
 - made themselves known to the authorities
 - submitted an asylum application
 - a legal right to stay in the country while waiting for a decision
- **Refugee:** Refugees are people who have fled war, violence, conflict or persecution and have crossed an international border to find safety in another country. The 1951 Refugee Convention is a key legal document and defines a refugee as: “someone who is unable or unwilling to return to their country of origin owing to a well-founded fear of being persecuted for reasons of race, religion, nationality, membership of a particular social group, or political opinion.”
In the UK a refugee:
 - has proven that they would be at risk if returned to their home country
 - has had their claim for asylum accepted by the government
 - has permission to stay in the UK either long term or indefinitely
- **Migrant:** A migrant is a person who moves from one country to another, this could be for several reasons, for example to work, study or to reunite with family.
- **No recourse to public funds:** This is a condition for a person that is subject to immigration control, and it means that they are not entitled to most public benefits due to their immigration status, for example a student, someone on a spousal visa or a visa overstayer.
- **Separated or Unaccompanied children:** Separated children and young people seeking sanctuary is an alternative to using the acronym UASCs (Unaccompanied Asylum-Seeking Children) or UAM (Unaccompanied Minors).
Unaccompanied can imply a deliberate decision to send lone children into danger and does not reflect the fact that many lose their families in the chaos of fleeing war and other dangers. In the UK, they are usually looked after by the local authority.

- **Indefinite Leave to Remain:** This is an immigration condition that gives a person the right to live indefinitely and is also called ‘settlement’. It gives a person the right to live, work and study and apply for benefits. It can also be used to apply for British citizenship.
- **Forced migrant:** A term commonly used for a person subject to a migratory movement in which an element of coercion exists, including threats to life and livelihood, whether arising from natural or man-made causes, e.g. movements of refugees and internally displaced persons as well as people displaced by natural or environmental disasters, chemical or nuclear disasters, famine or development projects or those who have been trafficked or enslaved.
- **A Person Seeking Sanctuary:** An umbrella term for someone seeking safety irrespective of immigration status.



Photographs by Keiko Ikeuchi, courtesy of Iraqi Women Art and War (IWAW)





COUNCIL OF
SANCTUARY AWARD
WELCOMING PEOPLE SEEKING SANCTUARY



Town Hall
St Aldate's
Oxford
OX1 1BX

Call 01865 249 811 or use the online form
or live webchat at:

www.oxford.gov.uk/contact-us/webchat

Risk Identification

Risks should be identified that may affect the Council's ability to achieve its business objectives, execute its strategies successfully or limit its ability to exploit opportunities.

Risks can be identified through a number of methods, including:

- A 'brainstorming' session or workshop with the whole management team and relevant stakeholders
- Interviews or questionnaires with key stakeholders
- Meetings with smaller groups of people

There are a wide range of methods available that can be used to identify and understand risks. The method that you select will depend upon the type of risk(s) that you are dealing with but typically a management team workshop is the method most commonly used.

Additionally, existing sources of information could help inform this stage. Some examples are listed below:

- Service / corporate plans, strategies and objectives
- Existing risk registers
- Risks or issues raised by internal audit or other scrutiny body
- Risks identified through budget setting processes
- Health & safety risk assessments
- Business continuity risk assessments
- Partnership, programme or project documentation (e.g. business case or project risk register)
- Experience of those participating in the risk identification process

It is the responsibility of those identifying risks to decide which sources of information they should consult. This may be one or more of the sources listed above or it could be something else you think is appropriate.

As well as direct risks to the achievement of our objectives it is important to think broadly about uncertainties that may have an impact on the organisation. The diagram shown below illustrates a variety of different risk themes, expanding on PESTLE prompts, which the organisation could face. Think also in terms of these themes when identifying risks.



Once identified, the risks need to be described in sufficient detail and recorded in a consistent format to support effective decision making on the way that the risk is managed. It is crucial for risks to be defined properly at this stage. Failure to do so can result in confusion about the exact nature of the risk, ineffective risk controls being implemented, or the risk analysis being over or underestimated.

The description of the risk should include the following elements:

- Risk Title – a short and concise header for the risk
- Description – expanding on the risk title outlining the situation or event that exposes us to a risk.
- Risk Cause – also known as the trigger event. Situations or factors which result in the risk becoming a reality.
- Risk Effect – the likely consequences if the risk materialises (The negative impact - consider worst likely scenario)

When describing a risk try not to describe the impact of the risk as the risk itself or define risks with statements which are the converse of objectives. Focus upon the uncertain event that would result in those impacts.

Types of Risk to consider	
Strategic / Commercial	
1	Under performance to specification
2	Management will under perform against expectations
3	Collapse of contractors
4	Insolvency of promoter
5	Failure of suppliers to meet contractual commitments (quality, cost, time)
6	Insufficient capital
7	Market fluctuations
8	Trade/Banking crises
9	Fraud/theft
10	Partnership failing to deliver desired outcomes
11	Situation is not insurable (cost of insurance outweighs the benefit)
Economic / Financial / Market	
1	Exchange rate fluctuation
2	Interest rate instability
3	Inflation
4	Shortage of working capital
5	Failure to meet projected revenue targets
6	Market developments will adversely affect plans
Legal and Regulatory	
1	New or changed legislation may invalidate assumptions upon which the activity is based
2	Failure to obtain appropriate approval e.g. planning consent
3	Unforeseen inclusion of contingent liabilities
4	Loss of intellectual property rights
5	Failure to achieve satisfactory contractual arrangements
6	Unexpected regulatory controls or licencing requirements
7	Changes in tax or tariff structure
Organisational / Management / Human factors	
1	Management incompetence
2	Inadequate corporate policies
3	Inadequate adoption of management practices
4	Poor leadership
5	Key personnel have inadequate authority to fulfil their roles
6	Poor staff selection procedures
7	Lack of clarity over roles and responsibilities
8	Vested interests creating conflict and compromising overall aims
9	Individual or group interests given unwarranted priority
10	Personality clashes
11	Indecision or inappropriate decision making
12	Lack of operational support
13	Inadequate or inaccurate information
14	Health and Safety constraints
Political	
1	Change of government policy
2	Change of government
3	War and disorder
4	Adverse public opinion/media intervention
Environmental	
1	Natural disasters
2	Storms, flooding, tempests
3	Pollution incidents

4	Transport problems (including aircraft/vehicle collisions)
Technical / Operational / Infrastructure	
1	Inadequate design
2	Professional negligence
3	Human error/incompetence
4	Infrastructure failure
5	Operation lifetime lower than expected
6	Increased dismantling/decommissioning costs
7	Safety being compromised
8	Performance failure
9	Residual maintenance problems
10	Scope creep
11	Unclear expectations
12	Breaches in security/information security
13	Lack or inadequacy of business continuity

Risk Evaluation and Prioritisation

Once risks have been identified the risk matrix is the main tool for prioritising risks so we can establish which risks are most significant and therefore are in need of greater attention and resources. It also allows us to compare different types of risk with each other across the council.

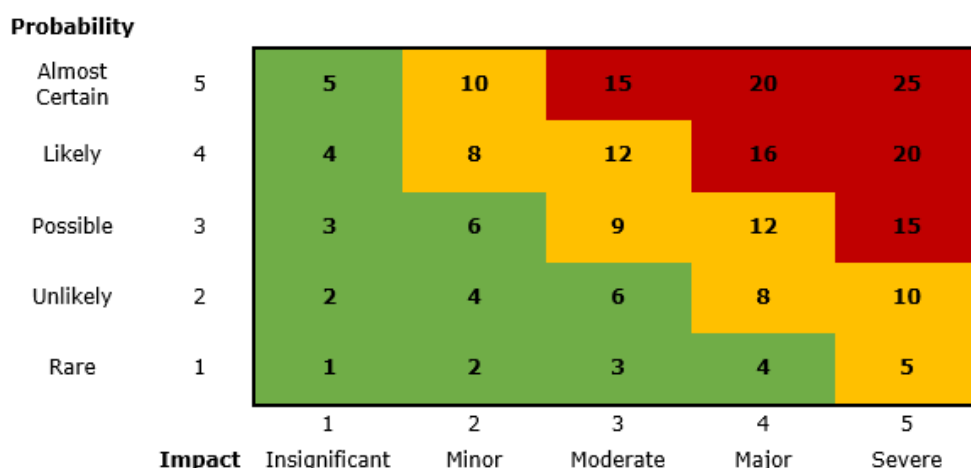
Each risk should be analysed using a five by five matrix for (1) the likelihood it will happen and (2) the impact if it did occur. This assessment should be made on three different basis:

- Gross risk – risk level if existing key controls and mitigations were not in place or not effective.
- Current risk – risk level after existing controls and mitigations are taken into consideration.
- Target risk – anticipated risk level following the introduction of planned controls and mitigations.

Assessing the gross risk allows consideration of the dependency the organisation has upon the existing key controls and informs decisions around risk treatment, and selection of an appropriate target risk level, considered in the next section of this toolkit. It is often helpful to consider the Current Risk first, and then ask yourself what the impact and likelihood of the risk might be if the key controls were not in place.

It is the risk owner's responsibility to ensure the controls they believe are reducing the risk are effective and are working in practice. Controls that are not yet in place should not be considered within the current risk.

Each identified risk should then be plotted onto the risk matrix.



When considering the likelihood of a risk happening you should select the number from 1 to 5 from the risk matrix that you think it will be over the next 12 months (it can be longer or shorter; some risks in the Strategic Risk Register are better considered over 3 to 5 years, some operational risks will be considered over 3 to 6 months). This score will require an element of judgement when considering how likely an event is to occur and you should consider the following:

- Has this event happened before in the Council? (How frequently?) Has this event happened elsewhere? (How frequently?)
- How likely is it that one or more of the causes/ triggers of the event will occur?
- Has anything happened recently that makes the event more or less likely to occur?

The following tables provide some support in quantifying the risk in terms of likelihood and impact.

Risk Probability Assessment Criteria

Scale	Description	Likelihood of Occurrence	Probability of Occurrence
1	Rare	1 in 10 years	The event may occur in certain circumstances
2	Unlikely	1 in 3 years	The event could occur
3	Possible	1 in 2 years	The event should occur
4	Likely	Annually	The event will probably occur
5	Almost certain	Monthly	The event is expected to occur or occurs regularly

When you select the impact you should give consideration to the factors outlined in the risk matrix. For example, if the risk you are scoring has a low financial impact but a high impact on our reputation then you would select the most appropriate number between 1 and 5 that relates to the level of reputational impact. Once again, this score will have an element of judgement.

Risk Impact Assessment Criteria

	Insignificant	Minor	Moderate	Major	Severe
Financial	<£50k per annum	£50k - £250k per annum	£250k - £500k per annum	£500k - £750k per annum	>£750k per annum
Service Delivery	No impact to service quality, limited disruption to operations	Minor impact to service quality, minor service standards are not met, short term disruption to operations, minor impact on a partnerships	Significant fall in service quality, major partnership relationships strained, serious disruption in service standards	Major impact to service quality, multiple service standards are not met, long term disruption to operations, multiple partnerships affected	Catastrophic fall in service quality and key service standards are not met, long term catastrophic interruption to operations, several major partnerships are affected
Reputation	Public concern restricted to local complaints which do not attract local media attention.	Minor adverse local / public / media attention and complaints	Adverse national media public attention	Serious negative national or regional criticism	Prolonged, regional & national condemnation
Compliance & Regulation	Minor breach of internal regulations, not reportable	Minor breach of external regulations, not reportable	Breach of internal regulations leading to disciplinary action Breach of external regulations, reportable	Significant breach of external regulations leading to intervention or sanctions	Major breach leading to suspension or discontinuation of business and services
Strategic	Little impact on the organisational strategy	May have an impact on achieving organisational strategy	Would impact on the organisational objectives	Would require a significant shift from current strategy and objectives	Would require a fundamental change in strategy and objectives

Risk Treatment

Once risks have been identified and scored based on current controls the next step is to decide what action needs to be taken to manage them. Generally speaking, there are four approaches to treating risk: Treat, Tolerate, Terminate or Transfer:

Action	Description	Options
Treat / Reduce	Controlling the likelihood of the risk occurring, or controlling the impact of the consequences if the risk does occur	Reducing the likelihood of the risk occurring AND / OR Mitigating the impact if the risk does occur
Tolerate / Accept	Acknowledging that the ability to take effective action against some risks may be limited or that the cost of taking action may be disproportionate to the potential benefits gained.	The ability to take effective action against some risks may be limited or the cost of taking action may be disproportionate to the potential benefits gained in which case the risk is accepted on an "informed" basis.
Terminate / Avoid	Not undertaking the activity that is likely to trigger the risk	Changing the direction or strategy and revisiting objectives or improving channels of communication Obtaining further information from external sources or acquiring expertise Reducing the scope of the activity or adopting a familiar, proven approach Deciding not to undertake the activity likely to trigger the risk
Transfer	Handing the risk on elsewhere, either totally or in part – e.g. through insurance.	Financial instruments such as insurance, performance bonds, warranties or guarantee. Renegotiation of contract conditions for the risk to be retained by the other party. Seeking agreement on sharing the risk with the other party. Sub-contracting risk to a consultant or external suppliers. NB. It may not be possible to transfer all aspects of a risk. For example, where there is or reputational damage to the organisation.

When considering further action required to manage the risk, and indeed the appropriateness of existing controls, an assessment of treatment options should be made alongside a consideration of the Council's risk appetite and tolerance for the current level of risk.

A further consideration is the efficiency of risk treatment in relation to the cost effectiveness of the proposed actions to be taken. Firstly the cost of implementation has to be considered (time, manpower, budget, etc.). The impact expected if no action is taken, should be weighed against the cost of action and the reduction of the impact. There should be a direct benefit from the cost implementation in terms of the reduction of the level of the risk.

Plans should then be put into place to manage the risk with key milestones identified and clear owners – ensuring that they are 'SMART' – Specific, measurable, achievable, realistic, time bound.

Oxford City Council has focused on the Red, Amber, Green status of risks in determining the risk appetite of the organization. Red risks are considered unacceptable and every effort must be made to reduce the risk to the organization.

The risk appetite is reviewed periodically or when there are significant changes to the organisation. Changes to the risk appetite level would require a change to strategy and would therefore require approval of the Cabinet.

This page is intentionally left blank

Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's [Public Sector Equality Duty \(PSED\) \(Equality Act 2010\)](#).

The General PSED enables Oxford City Council to:

- a. **identify and remove discrimination,**
 - b. **identify ways to advance equality of opportunity,**
 - c. **Foster good relations.**
2. [An EqIA must be done before making any decision\(s\)](#) that may have an impact on people and/or services that people use and depend on.
 3. [An EqIA form is one of many tools](#) that can simplify and structure your equalities assessment.
 4. We are passionate about equalities, and we highly recommend that [Corporate Management Team \(CMT\) reports and all projects must attach an EqIA.](#)

A good EqIA has the following attributes:

1. **Comprehensively considers the [9 protected characteristics](#).**

1. Age	6. Race & Ethnicity
2. Disability	7. Religion or Belief
3. Gender Reassignment	8. Sex
4. Marriage & Civil Partnership	9. Sexual Orientation
5. Pregnancy & Maternity	

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.
7. Provides clear **justifications** for your decisions.
8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	Name of activity being assessed.	Council of Sanctuary Framework <ul style="list-style-type: none"> To assess the impact of adopting the Council of Sanctuary framework on different protected characteristics and ensure it promotes equality and inclusivity. Objectives: <ul style="list-style-type: none"> Identify and remove potential discrimination. Advance equality of opportunity. Foster good relations between different community groups. 	2.	The implementation date of the activity under consideration: April 2025-March 2028 (3 years)
3.	Directorate/Department(s):	City and Citizens' Directorate	4.	Service Area(s): Housing Services
5.	Who is (are) the assessment lead(s):	Stephen Cohen Refugee and Resettlement Manager Housing Services scohen@oxford.gov.uk	6.	Contact details, in case there are queries: Stephen Cohen Refugee and Resettlement Manager Housing Services scohen@oxford.gov.uk
7.	Is this a new or ongoing EqlA?	New Extension to existing EqlA X	8.	If this is an extension of a previous EqlA, please indicate where the previous EqlA is located and share the link to the said EqlA. Web link to previous EQIA: Equality Impact Assessment
9.	Date this EqlA started:	18 October 2024 (Updated 18/05/2026)		
10.	Will this EqlA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?	No	11.	Give a date (tentative or otherwise) when this assessment will be taken to the CMT. Not applicable

Section 2: About the activity, change, or policy that is being assessed.

12.	Type of activity being considered:	<input type="checkbox"/> Budget	<input type="checkbox"/> Decommissioning	<input type="checkbox"/> Commissioning	<input type="checkbox"/> Change to an existing activity.	
<input type="checkbox"/> New Activity		<input checked="" type="checkbox"/> Others. To seek the Cabinet's approval of the Council of Sanctuary Framework annual update.				
13.	Which priority area(s) does this activity fulfil? within Oxford City Council's Corporate strategy (2024-2028)	<input type="checkbox"/> Strong, fair economy.	<input type="checkbox"/> Good, affordable homes.	<input checked="" type="checkbox"/> Thriving communities	<input type="checkbox"/> Zero Carbon Oxford.	<input type="checkbox"/> Well-run council.
14.	Which priority area(s) within does this activity fulfil? Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)	<input type="checkbox"/> Responsive services and customer care.	<input type="checkbox"/> Diverse and engaged workforce.	<input checked="" type="checkbox"/> Leadership & organisational commitment.	<input checked="" type="checkbox"/> Understanding and working with our communities.	
15.	Outline the aims, objectives, & priorities of the activity being considered.	<p>Aims:</p> <p>The Council of Sanctuary Framework sets out how the Council will support local people seeking sanctuary and work with stakeholders and the local community in line with the Thriving Communities Strategy,</p> <p>The Thriving Communities Strategy 2023-27 committed</p>	<p>Objectives:</p> <p>Within the Thriving Communities Strategy, the Council committed to work in collaboration with local residents including refugees, asylum seekers and the migrant community to inform and develop a Local Authority City of Sanctuary Action Plan and ensure the City Council meets its commitment to become an accredited local</p>	<p>Priorities:</p> <ul style="list-style-type: none"> • Working in partnership with communities, organisations, and agencies to reduce inequalities and create thriving communities • Championing diversity and inclusion in our own work and community partnerships 		

	<p>Oxford City Council to champion Equality, Diversity and Inclusion and engage with and facilitate conversations about equality throughout the city, and work to make Oxford an anti-racist city through the Council's Anti-Racism Charter.</p> <p>The Thriving Communities Strategy outlined the Council's approach to coordinating preventative services, reducing inequalities and improving residents quality of life.</p> <p>This activity is intrinsically linked to Oxford City Council's corporate strategy as laid out in the three key corporate priorities which fall within the <i>Thriving Communities</i> section.</p>	<p>authority of sanctuary which is achieved in November 2024.</p> <p>As part of this commitment, the Council has developed the Council of Sanctuary Framework and action plan to be implemented over a 3 year period and also a plan that is publicised. The Plan is currently at the beginning of year 2 and the linked cabinet report sets out year 1 progress.</p>	<ul style="list-style-type: none"> • Helping people live healthily by providing services, support, and facilities to prevent and manage physical and mental health conditions¹
<p>16. Please outline the consequences of not implementing this activity.</p>	<p>If the Council of Sanctuary Framework is not implemented:</p> <ol style="list-style-type: none"> 1. There may be an adverse impact on some of the most vulnerable members in the city. 2. The Council's commitment within the Thriving Communities to support refugees and asylum seekers establish successful lives in Oxford would not be met. 		

Section 3: Understanding service users, residents, staff and any other impacted parties.

<p>17. Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</p>	<p>A key objective was to engage key stakeholders (internal and external), as far as reasonably practical, in the development and implementation of a Council of Sanctuary framework.</p> <p>Officers set up an internal officer's project group in 2023, overseen by senior managers and an internal and external sanctuary group set up in 2024 and are now established groups meeting at least 3 times per year. In 2026 the external group will merge with Oxfordshire County Council's group, reducing duplication and</p>
--	---

¹ <https://www.oxford.gov.uk/policies-plans-strategies/strategy/6>

extended reach to all partners. The internal and external group meets regularly to review the action plan progress and routine updates will report into the Community Change Board which sits under the Thriving Communities section.

An email address (COS@oxford.gov.uk) is now established for feedback and communications to and from residents and stakeholders.

In terms of key historic interactions in June 2023 the Council of Sanctuary Award, process and task and finish group arrangements were taken to the internal Policy Officers Group as a key agenda item.

In October 2023, the Council commissioned a local refugee support charity with experience of policy and research, Asylum Welcome, to conduct a needs assessment for local residents in Oxford. The survey aimed to engage residents with lived experience and stakeholder groups who were working with local residents.

Sixty-six interviews were conducted between October and December 2023 with research conducted face-to-face, either in English or using translation, either one-to-one or in pairs.

The individuals interviewed were of different immigration status including:

- 27 asylum seekers who live in asylum accommodation
- 10 people with refugee status
- 7 people on resettlement schemes (ARAP, ACRS or UKRS).
- 8 Ukrainians on specific Ukraine visas
- 3 unaccompanied asylum seeking children
- 4 EU migrants with indefinite leave to remain in the UK
- 5 naturalised British citizens.

Eighteen different nationalities participated with two thirds of respondents identifying as male and one third female with the majority falling with the 25-34 age category. Asylum Welcome reported back in February 2024 and detailed their findings including the needs, barriers, and opinions of residents within a report.

Alongside the above individuals, thirty service providers also contributed to the needs assessment research either through one-to-one interviews or by attending two group-based virtual interview sessions. The stakeholders work in a range of context in the city including faith-based, youth work, health and medical provision, education and employment support, hosting arrangements and other services.

The Council was able to use the first-hand experience alongside other stakeholder engagement work to help inform the development of the Council's action plan and framework document.

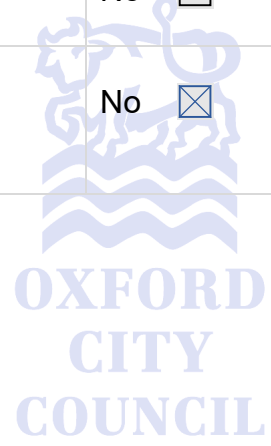
The Council of Sanctuary project team has sought to consult and engage internal staff from across the Council. Staff were therefore informed of the project objectives through internal communications including lunch and learn engagement meetings, Council newsletter, leadership briefings through the Council's staff conference attended by over 200 staff and there has been a number of further internal stakeholder communications including within the 2026 staff conference attended by over 300 staff, sanctuary newsletter, intranet and website updates and through lunch and learn events.

	<p>There have also been extensive discussions with external stakeholders including group discussions with representatives from statutory and non-statutory agencies such as from the voluntary and community groups. The sanctuary project team have also engaged the general public and local businesses via spontaneous interviews and documented case studies of people seeking sanctuary and local residents.</p>
<p>18. List information and data used to understand who your residents or staff are and how they will be impacted.</p>	<p>Data has been collected from a number of sources including commissioning and subsequent analysis of primary research and data between October and December 2023 which local residents with lived experience and external stakeholders were interviewed.</p> <p>Analysis has taken place of internal Council policies including key linked policies; the Thriving Communities Strategy, Equalities Diversity and Inclusion (EDI) Strategy, Housing, Homelessness and Rough Sleeping Strategy and the Council Strategy.</p> <p>Other data sources including internal Council data bases, data from the Office of National Statistics, Census data, published data from central government including Home Office migration statistics and other national policies to analysis the information.</p> <p>Other strategic/ equalities considerations</p> <ul style="list-style-type: none"> • Safeguarding/ Welfare of Children and Vulnerable adults • Mental Wellbeing/ Community Resilience • The Council Strategy 2024 to 2028 • Thriving Communities Strategy 2023 to 2027 • Equality, Diversity and Inclusion Strategy • Housing, Homelessness and Rough Sleeping Strategy • The Council's voluntary adoption of the socio-economic duty.
<p>19. If you have not done any consultations or collected data & information, are you planning to do so in the future?</p>	<p>Not applicable, please see section 17.</p>

Section 4: Impact analysis.

20.	Who does the activity impact?	Service Users	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		Members of staff	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		General public	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		Partner / Community Organisation	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		City Councillors	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		Council suppliers and contractors	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Don't Know <input type="checkbox"/>

www.oxford.gov.uk



21.	Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?					
Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations

<p>Age</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <p>Refugees and asylum seekers often experience similar issues upon arrival in the UK but have come from many different cultures, backgrounds and countries of origin.</p> <p>Taking a person-centered approach will ensure that individuals are supported to achieve integration regardless of their background or circumstances.</p> <p>There is anecdotal evidence that a large proportion of local people seeking sanctuary are in the 25-34 age bracket.</p> <p>The Council of Sanctuary framework seeks to put in increased support for this group alongside the wider cohort.</p>	<p>The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.</p> <p>No negative impacts of these proposals have been identified and seeks to have a positive impact.</p>
<p>64 Disability</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/> <p>Refugees and asylum seekers often experience similar issues upon arrival in the UK but have come from many different cultures, backgrounds and countries of origin.</p> <p>Taking a person-centered approach will ensure that individuals are supported to achieve integration regardless of their background or circumstances.</p> <p>There is anecdotal evidence that people seeking sanctuary have an increased risk of being diagnosed with a disability (visible and invisible) with higher reports of mental health conditions based</p>	<p>See above</p>

					<p>on historic and current experiences.</p> <p>The Council of Sanctuary framework seeks to put in increased support for this group alongside the wider cohort</p>	
<p>Gender re-assignment</p> <p>65</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.</p> <p>Some asylum seekers may have fled areas which were less tolerant of difference including gender re-assignment and will be better able to live as themselves in the UK.</p>	See above
<p>Marriage & Civil Partnership</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.</p>	See above
<p>Race, Ethnicity and/or Citizenship</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.</p> <p>Some asylum seekers may have fled areas which were less tolerant of difference and will be better able to live as themselves</p>	See above

					in the UK.	
Pregnancy & Maternity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.	See above
Religion or Belief	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.</p> <p>Some asylum seekers may have fled regimes which did not tolerate religious freedoms.</p>	See above
Sex	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>The activity is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK Immigration law) and promoting good relations between groups.</p> <p>A higher proportion of asylum seekers are males. Women are likely to experience greater equality in the UK than some of the regimes they have fled from.</p>	See above
Sexual Orientation	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The proposal is about improving outcomes for refugees and asylum seekers through challenging discrimination, ensuring equality of opportunity (where possible within UK	See above

				<p>Immigration law) and promoting good relations between groups.</p> <p>Some asylum seekers may have fled regimes which did not afford rights to people in same sex relationships and they will benefit from different social attitudes living in the UK.</p>	
<p>Other (voluntary consideration)</p> <p>For example:</p> <p>Migrant, refugee, or asylum seekers</p> <p>67</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p><input type="checkbox"/></p> <p>The data on this group is confounding mostly because this is a highly mobile group.</p> <p>However, it is estimated that 1 in 3 people in Oxford are some form of migrants.</p> <p>Refugees and asylum seekers are particularly vulnerable groups who often face significant barriers to accessing services and opportunities. These barriers can include language difficulties, lack of recognition of qualifications, and trauma from past experiences.</p> <p>Ensuring their inclusion in the City of Sanctuary framework involves:</p> <ul style="list-style-type: none"> • Providing tailored support services to address specific needs. • Promoting access to education, healthcare, and employment. • Ensuring that policies do not inadvertently discriminate against these groups. 	<p>This framework seeks to positively improve the service offer to residents who are affected by war and conflict and it aims to improve integration of local communities and therefore will have a positive impact on groups from backgrounds which contain a protected characteristic.</p> <p>The Council through the internal and external partnership groups will seek to mitigate any concerns raised by stakeholder groups.</p> <p>Adopting a Council of Sanctuary framework in Oxford involves creating a welcoming environment for all, particularly those seeking refuge. This includes:</p> <ul style="list-style-type: none"> • Building community awareness and understanding of the challenges faced by refugees and asylum seekers. • Encouraging local businesses and services to become more inclusive. • Developing partnerships with organisations that support refugees and

						<p>asylum seekers to enhance service provision.</p> <p>The ongoing work will have a positive impact on this group if the actions take on a targeted, strategic, informed and joined-up approach.</p>
<p>Other (voluntary consideration)</p> <p>For example:</p> <p>Socio-economic status (income, wealth, etc.)</p>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<p>Census 2021</p> <p>Inward migration is likely to place increased pressure on an already limited housing supply.</p> <p>The socio-economic duty under Section 1 of the Equality Act 2010 requires public bodies to consider how their decisions can reduce the inequalities of outcome caused by socio-economic disadvantage.</p> <p>This is particularly relevant for refugees and asylum seekers, who often experience higher levels of poverty and social exclusion.</p> <p>Research shows that Migrant workers make important contributions to the labour market in both high- and low-skilled occupations.</p> <p>However, those seeking asylum have limited rights, do not have access to full benefits and will be surviving on low incomes.</p> <p>The Council of Sanctuary framework can help overcome some of the disadvantage experienced by increasing access to networks and advocacy as well</p>	<p>Adopting a City of Sanctuary framework in Oxford involves creating a welcoming environment for all, particularly those seeking refuge.</p> <p>This includes:</p> <ul style="list-style-type: none"> • Building community awareness and understanding of the challenges faced by refugees and asylum seekers. • Encouraging local businesses and services to become more inclusive. • Developing partnerships with organisations that support refugees and asylum seekers to enhance service provision. <p>The ongoing work will have a positive impact on this group if the actions take on a targeted, strategic, informed and joined-up approach.</p>

					as support from things like foodbanks.	
--	--	--	--	--	--	--

Section 5: Conclusion(s) of your Full Impact Assessment

22.	Conclusions.							
	<input type="checkbox"/>	Stop and reconsider the activity.	<input type="checkbox"/>	Adjust activity before beginning the activity and continue to monitor.	<input checked="" type="checkbox"/>	No major change(s) or adjustments and continue with activity but continue to monitor.	<input type="checkbox"/>	No major change(s) or adjustments and continue with the activity. No need to monitor in the future.
23.	Please explain how you have reached your conclusions above.		<p>This framework and actions seeks to positively improve the service offer to residents who are affected by war and conflict, and it aims to improve integration of local communities and therefore will have a positive impact on groups from backgrounds which contain a protected characteristic and the Council to not expect any negative impacts on residents with individual protected characteristics.</p> <p>Its primary focus has therefore been to try to gain further insight into the relevant needs of local residents with lived experience and to work with them and builds on the key aim of the Thriving Communities Strategy to design programmes in conjunction with local residents and not to them.</p> <p>The Council has been working closely with local stakeholders including internal staff, the voluntary and community sector, inter-faith groups, business and education organisations and other key stakeholders to harness the skills and knowledge, show leadership and work together to provide the most impact and incorporate their views into the final framework document.</p>					

Overall, this has led to a comprehensive framework and action plan to be implemented over 3 years (2025-2028) which incorporates the EqIA.

The Council's plan to work with colleagues and external stakeholders across the life of the framework implementation period to deliver on the Council's commitments as set out in the Equalities, Diversity and Inclusion Strategy²:

- *providing inclusive services: understanding and addressing barriers to accessing our services, community assets and community engagement*
- *promoting partnership working: use our relationships to work together and connect different communities so that we can jointly address issues and celebrate strengths; this approach is embedded in our new Community Impact Fund*
- *empowerment: building community capacity to lead and participate in projects that benefit or affect their communities. In practice, this means doing “with” rather than “to” and, where possible, focusing on what is strong in communities rather than what’s wrong- this approach is often termed asset-based community development (ABCD). ABCD approaches show that connecting people and creating more resident-to-resident relationships builds interdependence and reliance on each other. Connecting people to their shared interests, and enabling them to exchange skills and resources, helps communities identify and take action on the issues that are most important to them.*

The Council plan to ensure information and communication is accessible, using a range of mediums both written and verbal and utilising translation services where required.

There are plans within the framework document to improve data collection so the Council can better understand some cohorts issues where there is limited public data and use this data to inform service development.

There are plans and on-going work to address gaps in understanding regarding marginalised groups such as individuals with no recourse to public funds (NRPF), who face acute barriers to accessing housing, money and other basic provisions. This can be especially problematic for women who are dependent on their spouses for their immigration status e.g. spousal's visa's or where they are sponsored by a family member. This will involve working with key partners to leverage support, especially for cases where the Council does not have a statutory duty. Overall, this framework seeks to positively improve the Council's service offer in this regard.

The framework outlines plans to ensure all staff are upskilled to deliver services and improve accessibility to services in a trauma informed and culturally sensitive way and to work with People Team partners to have a workforce that as a whole reflects Oxford's diverse population. The Council through the internal and external partnership groups will seek to mitigate any concerns raised by the stakeholder groups.

² <https://www.oxford.gov.uk/equality-diversity-inclusion/oxford-equality-diversity-inclusion-edi-strategy/6#:~:text=The%20Council's%20Strategy%20for%202020,the%20opportunities%20for%20disadvantaged%20groups.>

Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqlA action plan lies with the service/team completing the EqlA.

These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

24.	Who or which team or service area will be responsible for monitoring equalities impact?	<p>The Council of Sanctuary Cabinet report was approved in January 2025 and the report committed to an annual review to report back to Council members regarding the progress of the framework including a review of equalities considerations which has been completed as part of this updated EQIA.</p> <p>Two sanctuary partnership forums with internal staff and external partners and residents with lived experience have been set up to provide accountability to the action plan and meet quarterly from 2025-2028. Individual action owners report back on progress via automated Smart Sheet reporting functions set up by the Council of sanctuary project team.</p> <p>The framework action plan can be updated regularly and informed by what data tells us and if there any changing circumstances. Routine updates will report into the Community Change Board which sits under the Thriving Communities section.</p> <p>The Council will monitor related data where we have access to it and seek to work with partners organisations where we don't have access to the data to see trends and put in place mitigations if we discover that any measures introduced under this framework is adversely affecting certain groups in Oxford's communities.</p>		
25.	Who (individual, team, or service area) will be responsible for carrying out the EqlA review?	<p>Stephen Cohen Refugee and Resettlement Manager Housing Services</p> <p>scohen@oxford.gov.uk</p>		
26.	How often will the equality impact be reviewed for this activity?	Annually	27.	Date when the EqlA will be reviewed again. May 2027

Section 7: Sign-off

Name: Stephen Cohen Job Title: Refugee & Resettlement Manager Signature: <i>Stephen Cohen</i>	Name: Job Title: Signature: -----	Name: Job Title: Signature: -----
Name: Job Title: Signature: -----	Name: Job Title: Signature: -----	Name: Job Title: Signature: -----

72



Taking Action

This report provides an overview of progress against the Year 1 (April 2025 – March 2026) actions set out in the Council of Sanctuary Action Plan 2025- 2028, as approved by Cabinet in January 2025. The programme was originally designed as a phased three-year plan, with actions allocated across Years 1 to 3. The Action Plan is structured around six priority areas, reflecting the key themes identified through engagement, research, and partnership working. These priorities (see below) provide a clear framework to guide delivery and ensure a coordinated approach to supporting people seeking sanctuary across the city.

Since adoption, a number of actions have been brought forward into Year 1 (2025-26) in response to emerging business needs and local priorities. In such cases, actions may be recorded as year 2 or 3 within the overall programme; however, progress relevant to Year 1 delivery has been assessed using the standard RAG rating to ensure transparency.

A small number of Year 1 actions have not yet commenced due to competing operational priorities, but these have been reviewed and are being actively prioritised for delivery in Year 2. More detailed operational commentary and live progress tracking for all actions is maintained within the programme's dedicated Smartsheet.

73

Oxford City Council, Local Authority of Sanctuary

Action Plan Priorities

- 1. Wellbeing, Education & Employment**
- 2. Housing and Homelessness**
- 3. Building Communities and Amplifying Voices**
- 4. Shaping Services**
- 5. Supporting Integration**
- 6. Working in Partnership & Innovating**

1. Wellbeing, Education and Employment

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
1.1. Educate and empower Council teams and local businesses about opportunities to employ people seeking sanctuary and how to offer placements and apprenticeships, including through myth-busting on migrant entitlements with businesses as well as job brokers.	Regeneration and Economy	Year 1	A number of employment projects on-going, see cabinet report for further details.
1.2. Evaluate the Refugee Employment Support Programme (RESP), its findings and respond to the recommendations. Explore opportunities for further work around employment, business support and social enterprise.	Housing Services	Year 1	RESP evaluation to be produced in Year 2, minor delays due to developing evaluation project work.
1.3. Work with the anti-slavery coordinator and local modern slavery network to promote understanding around rights and safeguarding risks faced by people seeking sanctuary locally.	Community Safety	Year 2	
1.4. Work with key partners to develop and extend the existing schools advocacy project, subject to project viability.	Housing Services	Year 1	Schools Advocacy Project extended into 26/27
1.5. Improve access to wellbeing and leisure facilities for local people seeking sanctuary to improve health outcomes and reduce health inequalities.	Community Services	Year 2 <i>(brought forward to Year 1 because of local need)</i>	A number of wellbeing and community projects implemented, see cabinet report for further details.
1.6. Work with partners including Refugee Resource to improve therapeutic outcomes for people seeking sanctuary.	Housing Services	Year 2 <i>(brought forward to Year 1 because of local need)</i>	A number of health related projects supported, see cabinet report for further details.

2. Housing and Homelessness

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
2.1. Expand education and support for local people seeking sanctuary to help them navigate the housing system, especially for those experiencing homelessness, those at risk of homelessness, and those with limited experience of independent living (including UASC) in line with the Housing, Homelessness and Rough Sleeping Strategy.	Housing Services	Year 2 <i>(brought forward to Year 1 because of local need)</i>	A number of housing projects on-going, see cabinet report for further details
2.2. Provide training as appropriate for housing colleagues on how to support people seeking sanctuary, e.g. residents with varying immigration status including victims of domestic abuse with no recourse to public funds.	Housing Services	Year 2	
2.3. Develop further training on working with refugees (cross cultural communications and trauma informed practice) and offer it to colleagues.	Housing services	Year 2	
2.4. Increase engagement and support for landlords who wish to house people seeking sanctuary, including information and communication on the Council's private rented housing access schemes.	Housing Services	Year 2	
2.5. Provide appropriate support to sustain tenancies as part of the Council's approach to homelessness prevention and in line with the Housing, Homelessness, and Rough Sleeping Strategy.	Housing Services	Year 1	A number of housing projects on-going, see cabinet report for further details
2.6. Improve monitoring of the number of people seeking sanctuary who are sleeping rough and use intelligence to target support.	Housing Services	Year 1	Improved monitoring now in place working in partnership with the rough sleeping team.

3. Building Communities and Amplifying Voices

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
3.1. Empower and support local institutions to become registered places of sanctuary including libraries, surgeries arts, community, colleges, and faith organisations.	Housing Services	Year 3 <i>(brought forward to Year 1 because of local need)</i>	The Council is supporting a number of partners including Local Authorities and a local University to being registered places of sanctuary
3.2. Act as a lead Local Authority on joined-up campaigning for migrant rights, share learning and expertise through sanctuary networks at a local, regional, and national level including the City of Sanctuary Local Authority Network.	Housing Services	Year 3	
3.3. Continue to convene the Oxford City Council of sanctuary internal and external stakeholders' meetings to meet regularly to facilitate the Thriving Communities vision of "Doing with, not to" and advocate for an ethos and practice of 'Co-production'	Housing Services	Year 1	Stakeholder meeting groups successfully launched and convened.
3.4. Support refugee partners and community groups to access opportunities in arts, culture, and community activity via the use of our facilities, grants, and external funding. <ul style="list-style-type: none"> Collaborate with the local VCS to build capacity and participation of local lived experience groups via funding advice and support. Develop effective pathways into volunteering and participation via social and cultural activities. 	Community Services	Year 2 <i>(brought forward to Year 1 because of local need)</i>	See progress update in cabinet report – action on-going
3.5. Build capacity of local sanctuary seeking community via <u>Sanctuary Ambassadors</u> programme and access to the <u>Sanctuary in Politics</u> course.	Housing Services	Year 3	
3.6. Support refugee community groups to access spaces and	Community	Year 2	See progress update in cabinet

places where they can come together to enjoy common interests and create new friendships.	Services	<i>(brought forward to Year 1 because of local need)</i>	report – action on-going
---	----------	--	--------------------------

4. Shaping Services

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Progress Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
4.1. Develop/co-produce and share a sanctuary framework to support people seeking sanctuary and promote independent living for those staying in the City and beyond.	Housing Services	Year 1	Action complete, updated framework completed and updated onto OCC website.
4.2. Review incorporation of sanctuary principles into services when strategies, policies or services are changed.	Corporate Strategy	Year 2 <i>(brought forward to Year 1 because of local need)</i>	The Council has incorporated sanctuary principles into a number of strategies
4.3. Develop online resources to be more accessible for people seeking sanctuary including the Council's web page, the Communities Toolkit and information regarding accessing housing and other support.	Housing, Communities and Customer Services	Year 2 <i>(brought forward to Year 1 because of local need)</i>	The OCC website has been updated and made more accessible for example through enhanced translation icon to aid navigation
4.4. Create opportunities and space for people seeking sanctuary to have their voices heard and their stories told, so that their experiences can inform how services are delivered in the city. Ensure people seeking sanctuary can feed into Council activity through existing mechanisms.	Housing Services	Year 1	A number of co-production projects implemented, see cabinet report for further details.
4.5. Promote sanctuary informed practice across local strategic partnerships where Oxford City Council is key stakeholder.	Housing Services	Year 1	OCC continue to promote sanctuary informed practice across a number of partnerships

			including the Oxfordshire Migration Partnership.
4.6. Via the community health champions programme improve advocacy for people seeking sanctuary and access to primary health care for vulnerable and undocumented migrants.	Community Services	Year 1	Programme completed, see cabinet report for further details

5. Supporting Integration

What are we going to do?	Service	By end of year	Progress
		1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
5.1. Grow and publicise wider migrant-specific information, advice and guidance for all residents such as a Sanctuary Door initiative (Single Point of Contact), embedding opportunities for people with lived experiences to lead on service support.	Housing Services	Year 1	See progress update in cabinet report – action on-going
5.2. Continue to support local people seeking sanctuary who settled under government schemes including UK resettlement scheme (UKRS), Afghan Resettlement scheme (ARAP, ACRS), Asylum Dispersal Scheme and Homes for Ukraine scheme in line with statutory duties, corporate objectives and viability requirements.	Housing Services	Year 1	Resettlement activities successfully met corporate commitment in 2025.
5.3. Support the Council's ambition to support the Domestic Abuse Housing Alliance (DAHA) accreditation and feed in from sanctuary seeking groups perspective.	Regulatory Services and Community Safety	Year 3 <i>(brought forward to Year 1 because of local need)</i>	Action completed
5.4. Via sanctuary ambassadors programme and the external stakeholders group review availability of legal advice services for people seeking sanctuary. Alongside community partners, explore opportunities to support expansion of provision as well as pathways to access, & to provide residents with information about their rights.	Housing Services	Year 2	
5.5. Work alongside the Oxford Food Hub and other local charities to	Housing	Year 2	

	raise awareness of free or low-cost food options for people seeking sanctuary, in relation to accessing food, and engaging in the wider local food system and increasing communication to ensure people seeking sanctuary are aware.	services supported by Communities	(brought forward to Year 1 because of local need)	
5.6.	Produce a joint calendar of events which promote integration and support sanctuary events such as during Refugee week	Housing services	Year 1	To be produced in Year 2, delays due to prioritisation of other action plan objectives

6. Working in Partnership and Innovating

What are we going to do?	Organisation/ Group	By end of year	Progress
		1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Green - on track Amber - minor issues and/or delays Red - significant issues and/or delays Blue - completed Blank – Scheduled/Not Yet Started
6.1. Support local research bodies to (a) create and develop body of evidence demonstrating the positive impact of people seeking sanctuary locally and (b) analyse the benefits and opportunities they bring.	Council of Sanctuary (CoS) external stakeholders' group	Year 3	
6.2. Support Oxfordshire County Council and other key partners to increase English language provision (ESOL) accessibility to those with different immigration status, ages, childcare provision needs or access needs in a wide range of both statutory and community settings across the City.	Oxfordshire County Council (OCC)	Year 2	
6.3. Support the Getting Oxfordshire Online Digital Inclusion network, to bring together partners to identify digital barriers for refugees and asylum seekers in the City / county and promote greater digital inclusion for this group.	OCC supported by the CoS external stakeholders' group.	Year 1	Action delayed to Year 3 due to prioritisation of other action plan objectives
6.4. Collaborate with local partners and individuals seeking sanctuary to develop culturally appropriate and accessible health initiatives, with a strong focus on expanding access to mental health support. Engage with relevant charities & public	Council of Sanctuary external stakeholders' group	Year 3	

	services to explore and enhance support networks/resources.			
6.5.	Review existing support available to people with No Recourse to Public Funds (NRPF) via the establishment of an NRPF working group with Oxfordshire County Council and local VCS.	CoS external stakeholders' group	Year 1	The Council is working on a number of key projects related to NRPF individuals, see cabinet report for further details.
6.6.	Alongside partners, work to ensure asylum seekers have access to low affordable public transport & travel around Oxford	Oxfordshire County Council	Year 2	

Summary of Year 2 Action Plan Refresh

This report presents the refreshed Year 2 priorities for Oxford City Council's Local Authority of Sanctuary Action Plan (2025–2028), building on progress made during Year 1 and responding to emerging needs across the city.

Between January and May 2026, the Council of Sanctuary undertook a structured review process, gathering feedback from internal services, external partners, voluntary and community organisations, and people with lived experience of seeking sanctuary. This reflects the Council's commitment to co-production and ensuring that its approach is informed by both internal operational experience and city-wide lived realities.

The review identified strong progress to date, particularly in partnership working, community engagement especially co-production activities, and increasing awareness of sanctuary principles across services. However, it also highlighted a need to strengthen delivery in several key areas. As a result, the Action Plan has been updated to place greater emphasis on:

- Improved coordination and system-wide working
- More equitable access to provision across all parts of the city
- Stronger progression routes, particularly in employment, housing and skills
- Increased involvement and leadership of people with lived experience
- Greater sustainability, moving from pilot activity to longer-term delivery models
- Enhanced communications and community cohesion, including positive narrative and myth-busting work

The refreshed plan also streamlines completed actions and introduces targeted new actions, including a coordinated Sanctuary Pathway and a strengthened approach to community cohesion. Overall, Year 2 represents a shift from initial framework development to a stronger focus on delivery, impact, and system change, ensuring that Oxford continues to be a welcoming, inclusive city for people seeking sanctuary.

Oxford City Council, Local Authority of Sanctuary

Action Plan Priorities

1. Wellbeing, Education & Employment

2. Housing and Homelessness

3. Building Communities and Amplifying Voices

4. Shaping Services

5. Supporting Integration
6. Working in Partnership & Innovating

1. Wellbeing, Education and Employment

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
1.1. Educate, engage and partner with Council teams, local businesses, and anchor institutions to expand employment opportunities for people seeking sanctuary, including promoting placements and apprenticeships, addressing misconceptions about migrant entitlements, and developing sustainable pathways into sector-based roles and long-term employment.	Regeneration and Economy	Year 2	On-going action
1.2. Evaluate the Refugee Employment Support Programme (RESP), its findings and respond to the recommendations. Explore opportunities for further work around employment, business support and social enterprise.	Housing Services	Year 2	On-going action
1.3. Work with the anti-slavery coordinator and local modern slavery network to promote understanding around rights and safeguarding risks faced by people seeking sanctuary locally.	Community Safety	Year 2	

2. Housing and Homelessness

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
2.1. Expand education and support for local people seeking sanctuary to help them navigate the housing system, especially for those experiencing homelessness, those at risk of homelessness, and	Housing Services	Year 2	On-going action

	those with limited experience of independent living (including UASC) in line with the Housing, Homelessness and Rough Sleeping Strategy.			
2.2.	Provide training as appropriate for housing colleagues on how to support people seeking sanctuary, e.g. residents with varying immigration status including victims of domestic abuse with no recourse to public funds.	Housing Services	Year 2	
2.3.	Develop further training on working with refugees (cross cultural communications and trauma informed practice) and offer it to colleagues.	Housing services	Year 2	
2.4.	Increase engagement and support for landlords who wish to house people seeking sanctuary, including information and communication on the Council's private rented housing access schemes.	Housing Services	Year 2	
2.5.	Provide appropriate support to sustain tenancies as part of the Council's approach to homelessness prevention and in line with the Housing, Homelessness, and Rough Sleeping Strategy.	Housing Services	Year 2	On-going action
2.6.	Continue to monitor the number of people seeking sanctuary who are sleeping rough and use intelligence to target support.	Housing Services	Year 2	Updated*

83

3. Building Communities and Amplifying Voices

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
3.1 Empower and support local institutions to become registered places of sanctuary including libraries, surgeries arts, community, colleges, and faith organisations.	Housing Services	Year 3	On-going action
3.2 Act as a lead Local Authority on joined-up campaigning for migrant rights, share learning and expertise through sanctuary networks at a local, regional, and national level including the City of Sanctuary Local Authority Network.	Housing Services	Year 3	

<p>3.3 Work in partnership with Oxfordshire County Council to convene a joint Council of Sanctuary stakeholder group, bringing together shared external partners to improve coordination, reduce duplication, and strengthen a collective approach to delivery, while continuing to promote co-production and the Thriving Communities vision of “doing with, not to.” Internal stakeholder group will continue to meet.</p>	<p>Housing Services</p>	<p>Year 2</p>	<p>New*</p>
<p>3.4 Support refugee partners and community groups to access opportunities in arts, culture, and community activity via the use of our facilities, grants, and external funding. Collaborate with the local VCS to build capacity and participation of local lived experience groups via funding advice and support. Develop effective pathways into volunteering and participation via social and cultural activities.</p>	<p>Community Services</p>	<p>Year 2</p>	
<p>3.5 Build capacity of local sanctuary seeking community via <u>Sanctuary Ambassadors</u> programme and access to the <u>Sanctuary in Politics</u> course.</p>	<p>Housing Services</p>	<p>Year 3</p>	
<p>3.6 Support refugee community groups to access spaces and places where they can come together to enjoy common interests and create new friendships.</p>	<p>Community Services</p>	<p>Year 2</p>	

4. Shaping Services

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
4.1 Review incorporation of sanctuary principles into services when strategies, policies or services are changed.	Corporate Strategy	Year 2	On-going action
4.2 Develop online resources to be more accessible for people seeking sanctuary including the Council's web page and information regarding accessing housing and other support.	Housing, Communities and Customer Services	Year 2	On-going action
4.3 Create opportunities and spaces for people seeking sanctuary to have their voices heard and their stories shared, ensuring their experiences inform service design and delivery, while also supporting community cohesion through positive storytelling, myth-busting, and greater understanding across communities. Ensure people seeking sanctuary can feed into Council activity through existing mechanisms and co-production approaches.	Housing Services	Year 2	Updated*
4.4. Increase the visibility and understanding of the Council of Sanctuary approach across Oxford, communications campaigns, and partnership promotion to ensure residents, organisations, and businesses understand and engage with the initiative.	Housing Services	Year 2	New*
4.5. Strengthen the collection and use of data on people seeking sanctuary across council services, including housing, homelessness, employment, and community engagement, to better understand needs, track outcomes, and inform service design and policy decisions.	Housing Services	Year 2	New*

5. Supporting Integration

What are we going to do?	Service	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
5.1. Grow and publicise wider migrant-specific information, advice and guidance for all residents such as a Sanctuary Door initiative (Single Point of Contact), embedding opportunities for people with lived experiences to lead on service support.	Housing Services	Year 2	On-going action
5.2. Facilitate a co-production process with sanctuary-seeking groups to gather insights on their unique experiences and needs related to domestic abuse and ensure learning informs council working practice which will improve response to other women	Regulatory Services and Community Safety	Year 3	New*
5.3. Via sanctuary ambassadors programme and the external stakeholders group review availability of legal advice services for people seeking sanctuary. Alongside community partners, explore opportunities to support expansion of provision as well as pathways to access, & to provide residents with information about their rights.	Housing Services	Year 2	
5.4. Work alongside the Oxford Food Hub and other local charities to raise awareness of free or low-cost food options for people seeking sanctuary, in relation to accessing food, and engaging in the wider local food system and increasing communication to ensure people seeking sanctuary are aware.	Housing services supported by Communities	Year 2	On-going action
5.5. Produce a joint calendar of events which promote integration and support sanctuary events such as during Refugee week	Housing services	Year 2	On-going action

6. Working in Partnership and Innovating

What are we going to do?	Organisation/ Group	By end of year 1- 2025 - 2026 2- 2026 - 2027 3- 2027 - 2028	Notes
6.1. Support local research bodies to (a) create and develop body of evidence demonstrating the positive impact of people seeking sanctuary locally and (b) analyse the benefits and opportunities	Council of Sanctuary (CoS) external	Year 3	

	they bring.	stakeholders' group		
6.2.	Support Oxfordshire County Council and other key partners to increase English language provision (ESOL) accessibility and employment opportunities to those with different immigration status, ages, childcare provision needs or access needs in a wide range of both statutory and community settings across the City.	Oxfordshire County Council (OCC)	Year 2	Updated*
6.3.	Support the Getting Oxfordshire Online Digital Inclusion network, to bring together partners to identify digital barriers for refugees and asylum seekers in the City / county and promote greater digital inclusion for this group.	OCC supported by the CoS external stakeholders' group.	Year 3	Action year updated*
6.4.	Collaborate with local partners and individuals seeking sanctuary to develop culturally appropriate and accessible health initiatives, with a strong focus on expanding access to mental health support. Engage with relevant charities & public services to explore and enhance support networks/resources.	Council of Sanctuary external stakeholders' group	Year 3	
6.5.	Review existing support available to people with No Recourse to Public Funds (NRPF) via the establishment of an NRPF working group with Oxfordshire County Council and local VCS.	CoS external stakeholders' group	Year 2	Action year updated*
6.6.	Alongside partners, work to ensure asylum seekers have access to low affordable public transport & travel around Oxford	Oxfordshire County Council	Year 2	
6.6	Support the development of a coordinated "Sanctuary Pathway" offer across Oxford, which maps out the relevant support required i.e. housing, employment, ESOL, health, and community support into a clear, accessible and equitable pathway for people seeking sanctuary	CoS external stakeholders' group	Year 2	New*
6.7	Develop a coordinated approach to responding to community tensions related to migration and sanctuary, including cross-council collaboration, communication planning, and engagement with local communities to promote safety, cohesion, and trust.	CoS external stakeholders' group	Year 2	New*

This page is intentionally left blank

Priority Area and Key Performance Indicator (KPI)	Measure of success (if applicable)	Rag rating 25/26 EOY	Measure outcome
1. Wellbeing, Education and Employment		<p>Green - on track</p> <p>Amber - minor issues and/or delays</p> <p>Red - significant issues and/or delays</p>	
Support to access employment	50 people benefiting from support		<ul style="list-style-type: none"> • 15 people leaving Home Office accommodation supported with employability support through the Council's Youth Ambition Team • 20 people leaving Home Office accommodation supported with employability support through the Council's Community Team • 16 people supported who have been resettled via government backed resettlement schemes by commissioned partner
Support access to wellbeing, leisure facilities and therapeutic outcomes	100 people accessing wellbeing & leisure activities. At least 100 people supported to access counselling or other health services		<ul style="list-style-type: none"> • Over 1000 people attended wellbeing and sport sessions residing in Home Office accommodation supported by the Council's Community team • 6 people who have been resettled by the Council accessed counselling • 277 people residing in Home Office accommodation accessed health support through the Asylum Seeker Care Co-ordinator role
2. Housing and Homelessness			
Support access to housing advice	Deliver 100 face to face housing advice drop in sessions		<ul style="list-style-type: none"> • 219 people seen by the Council at the Home Office housing advice drop in

Improve housing outcomes for people seeking sanctuary	Deliver 50% positive housing outcomes for prevention & relief cases		<ul style="list-style-type: none"> • 42.5% successful outcomes for prevention & relief cases for households under HFU & leaving Home Office accommodation. • Move on period increases challenges to help resolve cases, the Council has plans to increase % success rate through increased homeless prevention activities in 26/27
3. Building Communities and Amplifying Voices			
Working with residents to co-produce information	Co-produce at least 5 housing advice leaflets and translated housing information videos		<ul style="list-style-type: none"> • 9 translated leaflets produced and translated videos available via the Council's YouTube channel giving guidance and housing advice
Lead and bring together stakeholders	Hold at least 3 internal and external stakeholder meetings		
4. Shaping Services			
Increase accessibility of information available	Make updates to the OCC website and produce sanctuary newsletters		<ul style="list-style-type: none"> • The Council's website updated, newsletter produced and produced Council of Sanctuary Framework document
Increasing resident feedback and co-production work	At least 50 people sanctuary seekers to participate in co-production groups or feedback on Council services through surveys, groups or interviews		<ul style="list-style-type: none"> • Engagement activities include: <ul style="list-style-type: none"> ○ Lunch & Learns (6) / Staff conference (4) / External stakeholder groups (12) / Sanctuary Fair planning (6) / Sanctuary Door planning and training (12) / Lived experience groups (16)
5. Supporting integration			
Support successful resettlement work	Support resettlement of 8 families		
Work with resident to co-	Hold at least 2 co-produced		

produce events	events		
6. Working in Partnership and Innovating			
Supporting access to English classes	At least 100 people participating in ESOL classes		<ul style="list-style-type: none"> • 31 people supported who have been resettled via government backed resettlement schemes by commissioned partner • 55 ESOL learners supported through partnerships with colleges • 14 learners supported via Oxfordshire County Council supported schemes
Improving outcomes for people with No Recourse to Public Funds (NRPF)	Co-produce a County wide NRPF protocol		<ul style="list-style-type: none"> • Currently in production and aim to deliver in 2026 • NRPF co-production group on-going and will produce a resource for other people with NRPF condition

This page is intentionally left blank

To: Cabinet
Date: 8 July 2026
Report of: David Butler, Director of Planning and Regulation
Title of Report: Private Sector Housing Enforcement Policy

Summary and recommendations	
Decision being taken:	To approve the Private Sector Housing Enforcement Policy for adoption
Key decision:	Yes
Cabinet Member:	Councillor Mike Rowley, Cabinet Member for Regulation of the Private Rented Sector and Preventing Homelessness
Corporate Priority:	Good, Affordable Homes
Policy Framework:	Housing and Homeless Strategy 2023-28

Recommendation(s):
That Cabinet resolves to: <ol style="list-style-type: none"> 1. Approve the Private Sector Housing Enforcement Policy (at Appendix 1) for adoption. 2. Delegate authority to the Director of Planning and Regulation, in consultation with the Director of Law and Governance and the Portfolio Holder, to approve future updates to the policy where such changes are consistent with the overall policy approach and reflect changes to legislation or relevant case law.

Information Exempt from Publication
None

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Private Sector Housing Enforcement Policy	No
Appendix 2	Risk Register	No

Appendix 3	Equality Impact Statement	No
-------------------	---------------------------	----

Introduction and background

1. The Housing Act 2004 places a duty on local authorities to keep housing conditions in their district under review with a view to identifying any action that may need to be taken. The Renters' Rights Act 2025 (RRA) has significantly extended the Council's statutory enforcement responsibilities in the private rented sector. New duties under the RRA include a requirement under section 107 to enforce what the Act terms the "Landlord Legislation", a defined set of provisions covering tenancy reform, unlawful eviction and harassment, and landlord obligations under the Housing Act 1988. A further duty under section 110 requires the Council to report to the Secretary of State on the exercise of those functions.
2. The Council's Corporate Enforcement Policy sets out the broad principles underpinning the Council's approach to enforcement across all service areas. That policy remains in force and unchanged. However, private sector housing enforcement operates under a distinct and technically complex legislative framework, involving a wide range of specialist powers and obligations under the Housing Act 2004, the RRA and associated legislation. This requires a dedicated policy to guide officer decision-making and ensure enforcement action is taken in a consistent, transparent and legally defensible way.
3. The Council operates full property licensing across the city, including mandatory and additional HMO licensing and selective licensing. This gives it an established enforcement baseline and an experienced Residential Regulation Team. The introduction of a dedicated enforcement policy reflects the scale of the Council's regulatory responsibilities in this area and aligns Oxford's approach with sector best practice.

The Policy

4. The Private Sector Housing Enforcement Policy (Appendix 1) sets out the Council's approach to enforcing its duties under the relevant legislation. It covers the full range of enforcement tools available, including Improvement Notices, Prohibition Orders, Emergency Remedial Action, civil financial penalties, Rent Repayment Orders, Banning Orders and entry to the Rogue Landlord Database.
5. In practice, the policy sets out what landlords, letting agents and tenants can expect when the Council investigates a complaint, identifies a breach of housing law, or considers whether to take formal enforcement action.
6. Much of this policy reflects and formalises existing practice. The Council has operated an experienced enforcement function in the private rented sector for a number of years and the policy largely codifies the approach officers already take. The principal changes reflect the new duties and powers introduced by the RRA, including the duty to enforce the Landlord Legislation and the expanded investigatory powers available to officers.

7. The policy incorporates the investigatory and entry powers introduced by the RRA, including powers to require information and enter premises, and sets out the circumstances in which formal action will be taken in the first instance.
8. The policy has been developed in line with the model policy published by the Association of Chief Environmental Health Officers (ACEHO), the professional body for housing enforcement authorities in England. Several local authorities have already adopted dedicated housing enforcement policies on this basis.
9. The Regulators' Code sets out principles of good regulation that public bodies are expected to follow when exercising certain enforcement functions, including acting proportionately and being transparent with those they regulate. The RRA and the Landlord Legislation as defined by section 107 sit outside the scope of the Code, meaning those enforcement functions are not subject to its principles. The policy makes this distinction explicit, as it affects how officers approach enforcement decisions under different parts of the legislative framework.

Alternative options considered

10. The alternative would be to continue relying solely on the Corporate Enforcement Policy as the framework for private sector housing enforcement. This was not considered appropriate given the technical complexity of the Council's housing enforcement responsibilities, the new statutory duties introduced by the RRA, and the increased risk of legal challenge to enforcement decisions in the absence of a specialist, publicly available framework.

Implications of Local Government Reorganisation

11. In preparing this report, regard has been given to Government guidance on financial decision-making in advance of Local Government Reorganisation.
12. The adoption of this policy does not involve capital expenditure, borrowing or long-term financial commitments. It is a framework document that enables the Council to carry out its existing statutory enforcement functions. Any successor authority would retain the ability to review, amend or replace the policy in accordance with prevailing legislation and guidance.
13. Adopting the policy at this stage ensures continuity and legal defensibility in enforcement decision-making during any transition period.

Financial implications

14. The adoption of this policy has no financial implications for the Council's General Fund. It does not require additional expenditure above that already committed to private sector housing enforcement.
15. Civil penalty income generated through enforcement activity is applied to fund enforcement work in the private rented sector, in accordance with Regulation 4 of the Rent Repayment Orders and Financial Penalties (Amounts Recovered) (England) Regulations 2017. A robust, legally defensible enforcement framework reduces the

risk of successful appeals against civil penalty notices, which supports the sustainability of that income stream.

16. If our policies become outdated and do not reflect current best practice there is a risk that more challenges could be made and that more of those challenges would be successful, which would result in additional costs and a reduction in income from financial penalties.

Legal issues

17. Section 107 of the RRA imposes a duty on the Council to enforce the Landlord Legislation as defined in that section. Section 110 imposes a further duty to report to the Secretary of State on the exercise of those functions. The policy provides the framework against which enforcement decisions can be made and scrutinised.
18. Officers are required to have regard to the policy when making enforcement decisions. This enables the Council to demonstrate that action has been taken in accordance with an approved, publicly available framework. Where the Council cannot demonstrate it has followed its own policy, defendants are entitled to cite that failure as part of any challenge or appeal. Having a clear, up to date policy therefore reduces both the number and success rate of appeals against enforcement action.

Level of risk

19. The updated risk register is attached at Appendix 2. The principal risk associated with this decision is the legal and reputational risk of enforcement decisions being successfully challenged in the absence of a formal framework. Adoption of the policy directly mitigates that risk.

Equalities impact

20. The Equality Impact Assessment is attached at Appendix 3. Private sector housing enforcement is primarily directed at improving property conditions and management standards. The Council's enforcement activity is largely focused on protecting vulnerable people and has a neutral or positive equality impact.

Carbon and Environmental Considerations

21. Many enforcement actions taken in the private rented sector result in improved property standards, which can contribute to improved energy efficiency and reduced carbon emissions. Adoption of this policy supports a consistent and proactive approach to enforcement, which is likely to have a positive environmental impact over time.

Conclusion

22. The Renters' Rights Act 2025 has significantly expanded the Council's statutory enforcement duties in the private rented sector. Adopting a dedicated Private Sector

Housing Enforcement Policy ensures the Council has a specialist, publicly available framework that reflects those duties, aligns with sector best practice and supports legally defensible decision-making. Cabinet is therefore recommended to approve the policy for adoption.

Report author	Courtney Bennett
Job title	Regulatory Services Manager
Service area or department	Planning and Regulation
Telephone	01865 252455
e-mail	Cbennett@oxford.gov.uk

Background Papers: None

This page is intentionally left blank

Private Sector Housing Enforcement Policy

**Enforcement of the Renters' Rights Act 2025 and
other housing legislation**

Contents

Background	3
Aims of the Policy.....	3
Approach to Enforcement.....	4
Investigatory Powers	5
Power to Investigate.....	5
Entry to Premises	6
No action.....	7
Informal action.....	7
Formal action	7
Housing Act 2004 Part 1.....	7
Work in default.....	8
HMO Licence Conditions.....	8
Prosecution	8
Civil (Financial) Penalties for specified offences	9
Rent Repayment Orders.....	9
Banning Orders	10
Rogue Landlord Database	10
Fit and Proper Person Policy	11
Costs and Charges	11
Notices under other Legislative alternatives	11
Delegation of Authority.....	11
Authorisation, training and appointment of officers	11
Publicising offences.....	12
Complaints	12
Policy review and updates	12

Background

This policy sets out the Council's principles for enforcing and executing its duties as a Housing Authority under the relevant statutes.

S3 Housing Act 2004 imposes a duty on Councils to keep housing conditions in their district under review with a view to identifying any action that may need to be taken by them.

S107 Renters' Rights Act 2025 imposes a duty on the Council to enforce the Landlord Legislation. The Landlord Legislation is comprised of the following:

- Chapters 3 and 6 of Part 1 of the Renters' Rights Act 2025,
- Part 2 of the Renters' Rights Act 2025,
- Sections 1 and 1A of the Protection from Eviction Act 1977, and
- Chapter 1 of Part 1 of the Housing Act 1988.

S110 Renters' Rights Act 2025 imposes a duty on the Council to report to the Secretary of State on the exercise of its functions under the Landlord Legislation.

In this policy, the term 'landlord' should be read as including letting agents, managing agents, licensors, property owners, directors of corporate landlords and any other person involved in the letting or management of privately rented accommodation.

In this policy, the terms 'House of Multiple Occupation' or 'HMO' are defined by the Housing Act 2004.

Aims of the Policy

The purpose of this enforcement policy is to provide guidance for Housing Authority officers to ensure enforcement action is taken in line with the provisions of Acts and regulations covered by this policy and mandatory guidance to local authorities.

Legislation within this policy

The Renters' Rights Act and the 'Landlord Legislation' (as defined by S107) sit outside of the Regulators' Code, and its provisions do not apply.

Part 1 of the Housing Act 2004 is also outside of the Regulators' Code's scope.

Notwithstanding this, the following legislation and its enforcement does come within the Legislative and Regulatory Reform (Regulatory Functions) Order 2007 and is therefore within the scope of the Regulators Code and the principles of good regulation:

- Parts 8, 9 and 10 of the Housing Act 1985
- Part 8 of the Housing Act 1996
- Parts 2 to 5 of the Housing Act 2004

This policy document sets out what owners, landlords, their agents or any other person involved in the letting or management of privately rented accommodation, and tenants of private rented sector properties, can expect from officers when dealing with non-compliance.

All enforcement action taken will be in accordance with relevant statutory Codes of Practice, Council procedures and protocols, and official guidance from central and local government bodies.

As a public body under the Human Rights Act 1998, the Council will apply the principles of the European Convention for the Protection of Human Rights and Fundamental Freedoms.

Legislation outside this policy

The legislation relating to letting or management of private rented properties is complex. All other legislation is covered by our Corporate Enforcement Policy and outside the scope of this policy, for example:

- Protection from Eviction Act 1977
- Part 2 Housing and Planning Act 2016
- Tenant Fees Act 2019,
- Smoke and Carbon Monoxide Regulations 2015,
- Efficiency (Private Rented Property) (England and Wales) Regulations 2015,
- Redress Schemes for Lettings Agency Work and Property Management Work (Requirement to Belong to a Scheme etc) (England) Order 2014

Approach to Enforcement

The Council wants to support responsible landlords to raise housing standards. However, the Council expects landlords to have a good understanding of the housing standards and management issues that should be met in privately rented accommodation.

Council officers will often investigate and identify the need to take enforcement action through a range of routes, including (but not limited to): proactive inspections of dwellings through licensing provisions; in response to a complaint or request for assistance; and referrals from other public bodies. All investigations will be carried out in accordance with the relevant statutory requirements. The Council will ensure that appropriate governance is in place to ensure that action is taken in accordance with appropriate policies.

The Housing Act Section 5 2004 places a duty on Councils to take appropriate enforcement action where a Category 1 hazard exists.

The Housing Act Section 7 gives Councils a discretionary duty to take action where a Category 2 hazard exists. The Council will usually take action where a medium band Category 2 hazard exists.

The Council may commence enforcement with formal action instead of informal action in the first instance. In deciding whether to do so, the circumstances of the case will be taken into account. Relevant factors may include, but are not limited to:

- Where there is a risk to public health
- Where there is a blatant or deliberate contravention of the law
- Where there is history of non-compliance

The Council will usually take formal action in the first instance if there has been:

- Non-compliance with previous formal or informal action
- Offences in relation to the licensing of privately rented properties

The Council will take formal enforcement action in the first instance for breaches of the Landlord Legislation.

Investigatory Powers

In addition to the Council's informal and formal powers of enforcement, there are investigatory powers relating to the collection of information and relating to the entry of premises including, but not limited to, the powers detailed below.

Power to Investigate

S114 Renters' Rights Act 2025 gives the Council power to issue a notice to a relevant person to require the person to provide specified information to the Council.

This notice may be given to any person with an estate or interest in the land; the licensor; their agents; or a marketer of a property. It may be given in regard to any offence under the following Legislation:

- Sections 1 and 1A of the Protection from Eviction Act 1977;
- Chapter 1 of Part 1 of the Housing Act 1988;
- Section 83(1) or 84(1) of the Enterprise and Regulatory Reform Act 2013;
- Sections 21 to 23 of the Housing and Planning Act 2016;
- Chapter 3 of Part 1 and Part 2 of the Renters' Rights Act 2025.

Failure to comply with a S114 notice is an offence under S131 Renters' Rights Act 2025, as is being obstructive and intentionally or recklessly making false or misleading statements in response to a S113 notice.

S115 Renters' Rights Act 2025 permits the Council when it reasonably suspects a breach of the Rented Accommodation Legislation to issue a notice to any person requiring them to provide the information specified. This may only be done to investigate whether a breach has occurred under the Rented Accommodation Legislation, or to determine the amount of a penalty. For the purposes of this section, the Rented Accommodation Legislation means:

- Sections 1 and 1A of the Protection from Eviction Act 1977
- Chapter 1 of Part 1 of the Housing Act 1988
- Parts 1 to 4 and 7 of the Housing Act 2004
- Section 83(1) or 84(1) of the Enterprise and Regulatory Reform Act 2013
- Sections 21 to 23 of the Housing and Planning Act 2016
- Chapter 3 of Part 1 and Part 2 of the Renters' Rights Act 2025.

Where an individual has not complied with a S115 notice, S116 Renters' Rights Act 2025 enables the Council to make an application to the Court to enforce the provisions of the notice and seek reimbursement for the costs of the application.

S131 Renters' Rights Act provides that, in addition to the offence of non-compliance with a S114 notice, it is an offence for an individual without reasonable excuse to obstruct a Council officer seeking to exercise their powers. It is also an offence to fail without reasonable excuse to give an officer any additional assistance or information which they reasonably require.

S235 Housing Act 2004 allows the Council to issue a notice to relevant individuals, including occupiers, directing them to provide specified documents under their control for the purpose of exercising the Council's functions under Parts 1 to 4 of the Housing Act 2004, or investigating whether an offence has been committed under Parts 1 to 4 or 7 of the Housing Act 2004 in relation to qualifying residential premises.

S16 Local Government (Miscellaneous Provisions) Act 1976 also permits the Council to issue a notice to an occupier, manager, or individual with an interest in the land to compel them to provide the Council with information on the nature of their interest and the names and addresses of current occupiers and of any others with an interest in the land.

Entry to Premises

S118 Renters' Rights Act 2025 permits Council officers to enter business premises of relevant people (including landlords, letting agents, and marketers) if it is necessary for the production or seizure of documents under s122-s123 Renters' Rights Act 2025. This power will be exercised without a warrant.

S121 Renters' Rights Act 2025 allows a Council officer named in a warrant to enter premises used for a rental sector business which is not mainly accommodation if there are documents on the premises which the officer could require under S122 or seize under S123. In addition, for this power to be exercised, one of the following conditions must be met:

- That access to the premises has been or is likely to be refused, and the Council has provided notice of their intention to apply for a warrant to the occupier;
- Those documents on the premises would likely be concealed or interfered with if notice of entry were to be given; or
- That no occupier is present, and waiting for their return might defeat the purpose of the entry.

Following a S118 or S121 Renters' Rights Act 2025 entry, S122 allows an officer at any reasonable time to require a relevant person on the premises to produce any documents relating to the business and to take copies of them. This may only be exercised to ascertain whether there has been a breach of the Rented Accommodation Legislation where an officer reasonably suspects there has been a breach or an offence; or to ascertain whether the documents may be required in evidence for proceedings regarding a breach or offence.

Following a S118 or S121 Renters' Rights Act 2025 entry, S123 authorises Council officers to seize and detain documents that the officer reasonably suspects may be required as evidence in proceedings relating to a breach of, or an offence under, the Rented Accommodation Legislation. When doing so, the officer will provide evidence of the officer's identity and authority if reasonably practicable. The officer will take reasonable steps to inform the person from whom documents have been seized that they have been seized, and will provide that person with a written record of what has been taken.

S126 Renters' Rights Act 2025 permits the Council to enter residential premises used for a tenancy at a reasonable time if the officer considers it necessary as part of an investigation into potential offences specified in subsection 1(b). Where required, the Council will give at least 24 hours' notice of this entry to the occupier and individuals with an interest in the property as per subsection 1(c), detailing in writing why the entry is necessary and the suspected offences. Where there are occupiers found on the premises, the officer will provide evidence of the officer's identity and authority to at least one of the occupiers if reasonably practicable.

In addition, S239 Housing Act 2004 permits Council officers to enter, if necessary and at a reasonable time, a property in order to carry out a survey or examination. This may be done if any one of the following is met:

- to determine if any Part 1-4 or 7 enforcement functions should be exercised;
- the premises are part of an Improvement Notice or Prohibition Order;

- a management order is in force under Chapter 1 or 2 of Part 4 on the premises.

In certain circumstance the Council may obtain a warrant to enter, by force if necessary, under S240 Housing Act 2004.

No action

In certain, but limited, circumstances it may be appropriate to take no action. For example: when we decide that the health and safety risk is sufficiently low; where there are extenuating circumstances regarding the person against whom we would take action on; taking legal action would be disproportionate or inappropriate taking into account the circumstances of the case; where the tenant does not want us to take action and we consider it is appropriate not to take action in the circumstances.

We may however make recommendations which are above the legal minimum requirements, advise if there are legal avenues open to persons to resolve the issues themselves or refer to another appropriate regulator or advice service.

Informal action

Informal action taken by the Council may be written or verbal advice. Additionally, a visit may be made at the outset by Council Officers in cases where the initial complaint or contact indicates that an immediate investigation by a Council officer is warranted.

In cases where officers visit an address, whether this is a result of a landlord's failure to adequately resolve a highlighted issue or as part of an audit or other investigation, written or verbal advice may be deemed sufficient should the inspection highlight minor deficiencies.

Where written advice is deemed appropriate by the Council and is provided, timescales will normally be included to undertake any specified work or actions.

While the Council will use its discretion on whether to carry out informal action for a Category 2 hazard, it does not need to provide written or verbal advice before commencing formal action.

Formal action

If formal action is considered appropriate, the following options are available to the Council.

Housing Act 2004 Part 1

- Issue an Improvement Notice in respect of any Category 1 hazards and any Category 2 hazards on the property. This requires the person to whom it is served to undertake the remedial action specified on the Notice within a given timeframe. The mandated work and the timeframe will be determined by the Council depending on the nature and scale of the work.
- Issue a Prohibition Order in respect of any Category 1 hazards and any Category 2 hazards on the property. This prevents occupation of whole or part of the property, or can be used to limit occupant numbers, within a specified time frame.
- Issue a Hazard Awareness Notice in respect of any Category 1 hazards and any Category 2 hazards on the property. This makes the owner and occupiers aware of

the hazards identified; however, it does not require remedial action. As a result, and because it does not secure risk-reducing works within a specified timeframe, a Hazard Awareness Notice will not usually be the most appropriate course of action where remedial works are necessary to reduce the risk of harm to occupiers or potential occupiers.

- Make an Emergency Prohibition Order in respect of Category One hazards only. This immediately prohibits the use of all or part of a dwelling if there is an imminent risk of serious harm to the health or safety of the occupants or others.
- Undertake Emergency Remedial Action in respect of Category One hazards only without prior notice where there is an imminent risk of serious harm to the health or safety of the occupants or others.
- The Council also has the power to suspend action taken under Part 1 Housing Act 2004 in situations where it has the power or duty to take enforcement action through the service of an Improvement Notice or Prohibition Order. This will be at the Council's discretion and will normally be considered for the purpose of minimising inconvenience to the current occupiers. Evidence may be requested to demonstrate occupiers' wishes.
- Demolition and Clearance are options for both Category 1 or Category 2 hazards.
- S30 Housing Act 2004 provides that failure to comply with an Improvement Notice is a criminal offence, which will normally be followed by prosecution or the issuing of a civil penalty.
- S32 Housing Act 2004 provides that failure to comply with a Prohibition Order is a criminal offence, which will normally be followed by prosecution.
- Other formal notices served by the Council may not relate to the landlord undertaking remedial works but may cover a range of other matters including, but not limited to, exercising a right of entry under S239 of the Housing Act 2004 and a request to provide information or the need to abate or avoid overcrowding.

Work in default

The enforcement options for non-compliance with formal Notices include the carrying out of works specified in the Notice. This power may be exercised in addition to other enforcement proceedings taken for non-compliance. The Council has no duty to undertake works in default and it will be at its discretion.

HMO Licence Conditions

Conditions can be added to HMO licences to require work to meet specified standards or to address HMO Management Regulation requirements. This power may be exercised in addition to other enforcement proceedings taken for non-compliance.

In general, authorities should seek to identify, remove or reduce category 1 or category 2 hazards in the house by the exercise of Part 1 functions and not by means of licence conditions however this does not prevent the authority from imposing licence conditions relating to the installation or maintenance of facilities or equipment even if the same result could be achieved by the exercise of Part 1 functions.

Failure to comply with these conditions is a criminal offence, which may result in prosecution or the issuing of a civil penalty.

Prosecution

Where a Civil Financial Penalty is an available alternative to prosecution, the Council will only consider using its power to prosecute in more serious cases.

The decision to prosecute will be determined by the evidential strength of the Council's case and the relevant public interest factors set down by the Director of Public Prosecutions in the Code for Crown Prosecutors.

In many circumstances, where an offence is committed by a body corporate, legislation enables local authorities to pursue persons involved with the body corporate in addition to, or instead of, the body corporate. These include company officers and, where applicable, company members.

The Council will determine, on a case-by-case basis, whether to take enforcement action against any person or persons that they consider fall within the scope of this category in addition to prosecuting the body corporate.

Civil (Financial) Penalties for specified offences

The Council is empowered to discharge a wide range of housing law breaches and offences via the imposition of Civil (Financial) Penalties.

Imposition of Civil (Financial Penalties) is in accordance with the evidential strength of the Council's case.

The Council's approach to determining and issuing financial penalties operates according to the standalone Housing Civil Penalties Policy.

Rent Repayment Orders

Part 2 of the Housing and Planning Act 2016 permits the Council to seek a Rent Repayment Order (RRO) at the First-tier Tribunal (Property Chamber) to require the landlord of the property where the offence(s) has been committed to refund rent to the tenants or the Council. S48 of the Housing and Planning Act 2016 places a duty on the Council to consider applying for Rent Repayment Orders.

Where a landlord has been convicted or received a Civil Financial Penalty in respect of the offence, the Tribunal must award the maximum applicable amount, except in exceptional circumstances.

This power will be considered in response to all qualifying offences and where there is sufficient evidence for a successful application to the First Tier Tribunal.

The qualifying offences are:

- Unlawful eviction and harassment of occupier as defined under the Protection from Eviction Act 1997
- Failure to comply with an Improvement Notice [s30 Housing Act 2004]
- Offences in relation to unlicensed HMOs [s72(1) Housing Act 2004]
- Offences in relation to unlicensed houses [s95(1) Housing Act 2004]
- Failure to comply with an Improvement Notice [s30(1) Housing Act 2004]
- Failure to comply with a Prohibition Order [s32(1) Housing Act 2004]
- Breach of a Banning Order [s21 Housing and Planning Act 2016]
- Using Violence to secure entry [s6(1) Criminal Law Act 1977]
- Knowingly or recklessly misusing a possession ground [s16J(1) Housing Act 1988]

- Letting or marketing of a property within twelve months of using the ‘moving in’ or ‘selling’ ground of eviction [s16J(2) Housing Act 1988]
- Continuous breach of certain tenancy reform requirements [s16J(3) Housing Act 1988]

An application for an RRO may be in addition to other formal action, such as prosecution proceedings or the imposition of a Civil Penalty. Where the Council has issued a Civil Financial Penalty or pursued prosecution, it will usually apply for a Rent Repayment Order where public funds have been paid to a landlord who has committed a qualifying offence.

S49 of the Housing and Planning Act 2016 enables the Council to assist tenants in applying for Rent Repayment Orders. The Council will usually assist tenants by referring or signposting them to a relevant organisation. Where the offence relates to unlicensed properties, a statement can be provided confirming presence / absence of an application for a licence (or temporary exemption) and associated dates.

Banning Orders

Part 2, Chapter 2 of the Housing and Planning Act 2016 permits a Council to apply for a Banning Order against a person who has been convicted of one or more of the relevant offences. This would prevent the landlord from:

- Letting housing in England;
- Engaging in English letting agency work;
- Engaging in English property management work; or
- Doing two or more of those things.

The Council may consider a Banning Order for the more serious offenders. It will take into account the seriousness of the offence(s), whether the landlord has committed other offences (or received any Civil Penalty in relation to a Banning Order offence) and any history of failing to comply with their obligations or legal responsibilities. It will also take into account other relevant factors, including but not limited to:

- The harm, or potential harm, caused to the tenant;
- The need to punish the offender;
- The need to deter the offender from repeating the offence;
- The need to deter others from committing similar offences.

The Council’s approach to application for a Banning Order operates according to the standalone Banning Order and Rogue Landlord Database Policy. This forms an appendix to this Policy.

Rogue Landlord Database

Part 2, Chapter 3 of the Housing and Planning Act 2016 states:

- An Authority must make a database entry if a banning order is granted by the First-tier Tribunal;
- An Authority may make an entry if the person was convicted of a banning order offence or has received two financial penalties in respect of specified offences in the previous twelve (12) months.

The purpose of the Rogue Landlord Database is for the purpose of sharing information with other Housing Authorities and there is no current public access.

The Council's approach to application for entry to the Rogue Landlord Database operates according to the standalone Banning Order and Rogue Landlord Database Policy. This forms an appendix to this Policy.

Fit and Proper Person Policy

Under the Housing Act 2004, if the Council is to issue a Selective or an HMO licence ("licence"), it must be satisfied that the proposed licence holder is a fit and proper person and is the most appropriate person to hold the licence. The Council must also be satisfied that the proposed manager of the house is a fit and proper person to be the manager of the house.

An existing licence may also be revoked where the Council no longer considers that the licence holder is a fit and proper person to be the licence holder, or where the Council no longer considers that the management of the house is being carried out by persons who are (in each case), fit and proper persons to be involved in its management.

The Council's approach to determining Fit and Proper Person Status operates according to the standalone Fit and Proper Persons Policy. This forms an appendix to this Policy.

Costs and Charges

The Council incurs costs in carrying out its functions. Where legislation allows, the Council will seek to recover reasonable costs and expenses associated with its enforcement, licensing and wider regulatory activity. This may include (non-exhaustively) costs arising from inspections, investigation, evidence gathering, notices and other statutory documentation, follow-up action, compliance monitoring, and works or other interventions.

Recovery may be pursued using all available lawful routes, which may include civil action, local land charges, and enforcement against the property. The Councils' Debt Recovery Policy applies for this purpose.

Where permitted, interest may be applied to outstanding sums until paid.

Notices under other Legislative alternatives

There may be other legislative alternatives available to remedy problems which an authority may choose as a more appropriate enforcement approach. Other legislative alternatives include, but are not limited to, the Smoke and Carbon Monoxide Regulations 2015, Building Act 1984, Prevention of Damage by Pests Act 1949, Public Health Act 1936 and Environmental Protection Act 1990. These options fall under the Council's Corporate Enforcement Policy.

Delegation of Authority

The Council's Constitution and Scheme of Delegations specify the extent to which enforcement powers are delegated to officers.

Authorisation, training and appointment of officers

All enforcement officers will be appropriately authorised by the Director of Planning and Regulation.

All enforcement officers are required to carry identification in the form of an “Authority to Enter” card bearing their photograph. If an officer does not show their card, they may be asked to show it by anyone who is requested to allow entry. If no card is produced, entry may be legitimately refused and no punitive enforcement action will result. If a member of the public has any doubt about the officer’s identity, they may telephone the Council 01865 259811.

All enforcement officers will be suitably trained and qualified to ensure officers are fully competent to undertake their enforcement activities.

Publicising offences

Verdicts and sentences in criminal cases are given in open court and are a matter of public record. The Council will normally publicise sentences following a prosecution, however decision whether to publicise will be made on a case by case basis. Publicising guidance has a presumption in favour of publicising outcomes of criminal cases and personal information about convicted offenders.

Financial penalties are a civil matter. The Council will periodically publish a list of penalties, consisting of offence, date and fine.

Complaints

Contact may be made with the Council about any matters listed here by website form, telephone 01865 259811 or in person at one of our customer advice centres.

<https://www.oxford.gov.uk/comments-compliments-complaints/make-comment-compliment-complaint>

A service user can still make a complaint in cases where the Council has instigated legal proceedings. However, making a complaint will not stop any impending legal action.

Where statutory notices have been served, making a complaint does not replace the statutory rights of appeal or the right to make representations. It also does not allow extra time to comply with any notice or order.

If a service user disagrees with a statutory notice, they should take action as specified in the notice or order to make an appeal, if any exists. Reference should be made to any notes that may accompany the notice or order for more detail.

Policy review and updates

To ensure this policy stays up to date with changes in legislation and relevant caselaw, this policy authorises the Director of Planning and Regulation with the Director of Law and Governance, in consultation with the Portfolio Holder for Housing to approve updates to this policy where such changes are consistent with the overall policy approach.

This page is intentionally left blank

Risk Register

Private Sector Housing Enforcement Policy

01 June 2026

Ref	Description	Consequence	Name of Risk Owner	Gross			Current			Target			Control/Mitigation Description	Control Date Due	Progress on Control/Mitigation	Action Owner
				P	I	Score	P	I	Score	P	I	Score				
1	Without a clear standalone enforcement policy reflecting current legislation, enforcement decisions are vulnerable to legal challenge. Some RRA 2025 provisions remain legally uncertain pending tribunal and case law development.	Enforcement actions prolonged or unsuccessful. Increased legal costs and reputational damage.	Courtney Bennett	5	3	15	3	2	6	3	2	6	Standalone policy adopted, drafted from ACEHO model and reviewed by Legal Services. Director-level authorisation built in for policy updates. Officer training prior to implementation. Case law monitored and policy updated accordingly.	ongoing	70%	Courtney Bennett
2	The new policy is applied inconsistently across the service	Enforcement decisions challenged or overturned	Courtney Bennett	4	3	12	3	2	6	3	2	6	Officer training prior to implementation. Final penalty and prosecution decisions approved at Area Manager level or above. Consistency exercises at team meetings.	ongoing	50%	Courtney Bennett
3	Enforcement activity impacts disproportionately on groups with protected characteristics	Legal challenge on equalities grounds. Enforcement decisions overturned. Reputational damage.	Courtney Bennett	4	3	12	3	2	6	3	2	6	Monitoring and scrutiny of enforcement action to identify impacts.	ongoing	80%	Courtney Bennett

This page is intentionally left blank

Why do an Equalities Impact Assessment (EqIA)?

1. Equalities Impact Assessment (EqIA) is part of Oxford City Council's [Public Sector Equality Duty \(PSED\) \(Equality Act 2010\)](#).

The General PSED enables Oxford City Council to:

- a. **identify and remove discrimination,**
 - b. **identify ways to advance equality of opportunity,**
 - c. **foster good relations.**
2. [An EqIA must be done before making any decision\(s\)](#) that may have an impact on people and/or services that people use and depend on.
 3. An [EqIA form is one of many tools](#) that can simplify and structure your equalities assessment.
 4. We are passionate about equalities, and we highly recommend that [Corporate Management Team \(CMT\) reports and all projects must attach an EqIA](#).

A good EqIA has the following attributes:

1. **Comprehensively considers the [9 protected characteristics](#).**

1. Age	6. Race & Ethnicity
2. Disability	7. Religion or Belief
3. Gender Reassignment	8. Sex
4. Marriage & Civil Partnership	9. Sexual Orientation
5. Pregnancy & Maternity	NEW- Socio-economic inequalities (voluntary adoption)
	NEW- Sanctuary seeking status leading to intersecting inequalities (voluntary adoption)

2. It has **considered equality of treatment** towards service users, residents, employees, partners, council suppliers & contractors, and Council Members
3. Sufficiently considered **potential and real impact** of proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members.
4. **Systematically recorded and reported** any potential and real impact of your proposal or policy on service users, residents, employees, partners, council suppliers & contractors, and Council Members
5. **Collected, recorded, & reported sufficient information and data** on how your policy or proposal will have an impact.
6. Offers **mitigations or adjustments** if a PSED has been impacted.

- 7. Provides clear **justifications** for your decisions.
- 8. It is written in **plain English** with simple short sentence structures.

Section 1: General overview of the activity under consideration

1.	Name of activity being assessed.	Private Sector Housing Enforcement Policy (new policy)	2. The implementation date of the activity under consideration:	09/07/2026
3.	Directorate/Department(s):	Planning and Regulation	4. Service Area(s):	Regulatory Services, Regulation Residential Team
5.	Who is (are) the assessment lead(s): Please provide: -Name -Email address	Courtney Bennett	6. Contact details, in case there are queries: Please provide: -Name -Email address	cbennett@oxford.gov.uk
7.	Is this a new or ongoing EqIA?	New <input type="checkbox"/>	8. If this is an extension of a previous EqIA, please indicate where the previous EqIA is located and share the link to the said EqIA.	
9.	Date this EqIA started:	01/07/2026		
10.	Will this EqIA be attached to Corporate Management Team (CMT) reports/updates, which will be published online?	No	11. Give a date (tentative or otherwise) when this assessment will be taken to the CMT.	

Section 2: About the activity, change, or policy that is being assessed.

<p>12.</p>	<p>Type of activity being considered:</p> <p>Check the most appropriate.</p>	<input type="checkbox"/>	<input type="checkbox"/> Decommissioning	<input type="checkbox"/> Commissioning	<input type="checkbox"/>	
		<input checked="" type="checkbox"/> New Activity		<input type="checkbox"/> Others. Please specify:		
<p>13.</p>	<p>Which priority area(s) <u>within Oxford City Council's Corporate strategy (2024-2028)</u> does this activity fulfil?</p> <p>Please check as needed.</p>	<p>X</p> <input checked="" type="checkbox"/> Good, affordable homes	<input type="checkbox"/> Strong, fair economy	<input type="checkbox"/> Thriving Communities	<input type="checkbox"/> Zero Carbon Oxford	<input type="checkbox"/> Well run council
<p>14.</p>	<p>Which priority area(s) within <u>Oxford City Council's Equality, Diversity & Inclusion Strategy (2022)</u> does this activity fulfil?</p> <p>Please check as needed.</p>	<input type="checkbox"/> Responsive services and customer care.	<input type="checkbox"/> Diverse and engaged workforce.	<input type="checkbox"/> Leadership & organisational commitment.	<p>X</p> <input checked="" type="checkbox"/> Understanding and working with our communities.	
<p>15.</p>	<p>Outline the aims, objectives, & priorities of the activity being considered.</p>	<p>Aims: To set out the Council's principles and approach to enforcing housing legislation in the private rented sector, including new duties introduced by the Renters' Rights Act 2025.</p> <p>Objectives: To ensure enforcement action is taken consistently, fairly and transparently, and that landlords, agents and tenants understand what to expect from the Council.</p> <p>Priorities: To tackle poor housing conditions and management in the private rented sector, protect tenants from unlawful practices, and meet the Council's statutory enforcement duties.</p>				

<p>16. Please outline the consequences of not implementing this activity. For example, -Existing activity does not fulfill Corporate Objectives, -existing activity is discriminatory and not fulfilling Council's PSED, ... to name a few.</p>	<p>The Council would lack a clear standalone enforcement policy reflecting current legislation, leaving enforcement decisions vulnerable to legal challenge. Officers would have less clear guidance on the application of new statutory duties under the Renters' Rights Act 2025, increasing the risk of inconsistent decision-making.</p>
---	--

Section 3: Understanding service users, residents, staff and any other impacted parties.

<p>17. Have you undertaken any consultations in the form of surveys, interviews, and/or focus groups?</p> <p>Please provide details— -when, -how many, and -the approach taken.</p>	<p>No formal consultation was undertaken for this policy. The primary audience is landlords, letting agents and managing agents operating in Oxford's private rented sector. The policy is based on the ACEHO model policy for local housing authorities and has been reviewed by Legal Services. It replaces an approach that sat within the Corporate Enforcement Policy rather than a standalone document.</p>
<p>18. List information and data used to understand who your residents or staff are and how they will be impacted.</p> <p>These could be- -third-party research, -census data, -legislation, -articles, -reports,</p>	<p>Renter's Rights Act ACEHO model policy Selective licensing and hmo licensing data Census data</p>

19.	<p>If you have not done any consultations or collected data & information, are you planning to do so in the future?</p> <p>Please list the details – -when, -with whom, and -how long will you collect the relevant data.</p>	NA
------------	--	----


Section 4: Impact analysis.


20.	Who does the activity impact?	Service Users	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	Check as needed.	Members of staff	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
	The impact may be positive, negative or unknown.	General public	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		Partner / Community Organisation	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		City Councillors	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>
		Council suppliers and contractors	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Don't Know <input type="checkbox"/>

21.		Does the activity impact positively or negatively on any protected characteristics as stated within Equality (Act 2010)?					
Protected Characteristic	Positive	Negative	Neutral	Don't know	Data/information/evidence supporting your assessment	Analysis & insight Mitigations	
Age 121		<input type="checkbox"/>	X	<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to age	The Council do not collect data in relation to age of landlords/property managers and is not considered to impact on the use of these policies.	
Disability (Visible and invisible)		<input type="checkbox"/>	X	<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to disability	The Council do not collect data in relation to disability of landlords/property managers and is not considered to impact on the use of these policies.	
Gender re-assignment		<input type="checkbox"/>	X	<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the	The Council do not collect data in relation to gender re-assignment of landlords/property managers and is	

					rental market there is a neutral impact in relation to gender re-assignment	not considered to impact on the use of these policies.
Marriage & Civil Partnership	<input type="checkbox"/>	<input type="checkbox"/>	X	<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to marital status	The Council do not collect data in relation to marital status of landlords/property managers and is not considered to impact on the use of these policies.
Race, Ethnicity and/or Citizenship		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to Race, Ethnicity and/or citizenship	<p>The main groups affected are those who do not speak English as a first language (or at all) and those with limited or no ability to understand how the policy/law affects them day to day</p> <p>To mitigate for this, translation services are offered at formal interviews and where required in all interventions.</p> <p>Property reports will where necessary contain photographic evidence of defects for some areas of the enforcement work. Engagement with landlords of ethnic groups is encouraged through landlord forums, face to face meetings and newsletters where legal obligations of being a landlord/ property manager are highlighted and discussed</p>
Pregnancy & Maternity	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and	The Council do not collect data in relation to pregnancy of landlords/property managers and is

				other property managers operating in the rental market there is a neutral impact in relation to pregnancy	not considered to impact on the use of these policies.
123 Religion or Belief	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to religion or belief	The Council do not collect data in relation to religion or beliefs of landlords/property managers and is not considered to impact on the use of these policies.
Sex			<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to sex	The Council do not collect data in relation to sex of landlords/property managers and is not considered to impact on the use of these policies.
Sexual Orientation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to sexual orientation.	The Council do not collect data in relation to Sexual Orientation of landlords/property managers and is not considered to impact on the use of these policies.

<p>Socio-economic inequalities such as:</p> <ul style="list-style-type: none"> - income and factors that impact income. -access to jobs <p>This was voluntarily adopted by Oxford City Council on the 13th of March 2024.</p>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<p>As this policy is aimed to provide clarity and transparency to landlords and other property managers operating in the rental market there is a neutral impact in relation to socio-economic inequalities.</p>	<p>Smaller and accidental landlords may have fewer resources to respond to enforcement action than larger portfolio landlords. The policy applies consistently regardless of portfolio size.</p>
<p>Other (voluntary consideration)</p> <p>Sanctuary seeking status leading to intersecting inequalities experienced by</p> <p>For example:</p> <p>asylum seeker, refugee, person with insecure immigration status</p> <p>Oxford City Council became a local</p>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<p>www.oxford.gov.uk</p> 	

<p><u>authority of sanctuary</u> in December 2024, thereby committing to learn from our experiences, embed inclusive practices and share efforts to create a culture of welcome and safety for all.</p>						
<p>Other For example: - Unpaid carers - Prison population - Homeless population - Council suppliers & contractors - Cabinet Members</p>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>		

Section 5: Conclusion(s) of your Full Impact Assessment

22.	Conclusions.						
<input type="checkbox"/>	Stop and reconsider the activity.	<input type="checkbox"/>	Adjust activity before beginning the activity and continue to monitor.	<input checked="" type="checkbox"/>	No major change(s) or adjustments and continue with activity but continue to monitor.	<input type="checkbox"/>	No major change(s) or adjustments and continue

with the activity. No need to monitor in the future.

<p>23.</p>	<p>Please explain how you have reached your conclusions above.</p>	<p>Benefits of Implementation:</p> <p>Promotes Equity: Ensures everyone has equal opportunities.</p> <p>Enhances Diversity:</p> <p>Improves Representation:</p> <p>The impact of this policy on protected characteristics is neutral. It applies consistently to all landlords and property managers regardless of protected characteristics. The service will monitor the application of the policy to identify any patterns of disproportionate impact, and senior manager sign-off on enforcement decisions provides a further check. The policy will be reviewed regularly to reflect changes in legislation and case law.</p>
-------------------	---	--

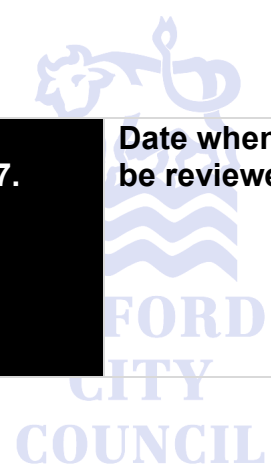
Section 6: Monitoring and review plan.

The responsibility for maintaining a monitoring arrangement of the EqlA action plan lies with the service/team completing the EqlA.
These arrangements must be built into the performance management framework such as KPIs or Risk Registers.

<p>24.</p>	<p>Who or which team or service area will be responsible for</p>	<p>Regulatory Services, Residential Regulation Team</p>
-------------------	---	---

	<p>monitoring equalities impact?</p> <p>For example- - team, -directorate, -service area, -Equalities Steering Group,etc.</p>				
<p>25.</p>	<p>Who (individual, team, or service area) will be responsible for carrying out the EqlA review?</p>	<p>Regulatory Services Manager</p>			
<p>26.</p>	<p>How often will the equality impact be reviewed for this activity? For example- -quarterly, -yearly, etc.</p>	<p>Annually</p>	<p>27.</p>	<p>Date when the EqlA will be reviewed again.</p>	<p>1/07/2026</p>

www.oxford.gov.uk



Section 7: Sign-off

Name: Courtney Bennett

Job Title: Regulatory Services
Manager

Signature:

Name: David Butler

Job Title: Director, Planning and
Regulation

Signature:

Name: Full Name

Job Title: Type here

Signature:

Suggested list of people to include are:

- 1) Project lead/manager.
- 2) Head of service area or team.
- 3) Person who completed the EqlA.
- 4) EDI Lead.
- 5) EDI Specialist.
- 6) For joint projects, please consider the following:
 1. Other project leads
 2. Other service area and/or team lead/managers.

This is not an exhaustive list.

Name: Gail Malkin

Job Title: Head of People

Signature:
G Malkin

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

Name: Full Name

Job Title: Type here

Signature:

128

To: Cabinet
Date: 17 June 2026
Report of: Scrutiny Committee
Title of Report: Recommendations from the Scrutiny Committee

Summary and recommendations	
Decision being taken:	To submit the recommendations of the Scrutiny Committee for Cabinet's consideration.
Key decision:	No
Lead Member:	Councillor Alex Powell, Chair of the Scrutiny Committee
Corporate Priority:	A Well-Run Council
Policy Framework:	None

Recommendation(s): That the Cabinet:
1. Consider and note the update from the Scrutiny Committee as set out in the report.

Information Exempt From Publication	
N/A	N/A

Appendix No.	Appendix Title	Exempt from Publication
N/A	N/A	N/A

Overview and Summary

- The Scrutiny Committee met on 9 June 2026 and reviewed the following items:
 - Establishment of the Scrutiny Standing Working Groups and Review Group
- Section 9F of the Local Government Act 2000 grants the power to the Scrutiny Committee to make reports or recommendations to the Cabinet with respect to the

discharge of any functions which are the responsibility of the Executive; and on matters which affect the authority's area or the inhabitants of that area.

3. Minutes of relevant meetings are available detailed below:

- [Scrutiny Committee – 9 June 2026](#)

Establishment of the Scrutiny Function for 2026-2027

4. The Scrutiny Committee agreed to elect Councillor Alex Powell as the Chair of the Committee for the municipal year, allowing continuity during a period where the authority will be undergoing Local Government Reorganisation later in the year. Councillor Simon Ottino was elected as Vice-Chair.
5. The Committee also established its standing Working Groups for 2026 to 2027, the same groups as in previous years (Climate and Environment, Finance and Performance & Housing and Homelessness), showing continuity during a period of transition for the Council, but also while the authority must continue to meet its statutory obligations.
6. The meetings have been scheduled until April 2027 and will continue to offer the detailed and focused scrutiny of the Council's performance and progress throughout the year.
7. The intention to establish a Budget Review Group for December 2026 to February 2027 has also been agreed, with the scope and Terms of Reference being brought to the Scrutiny Committee for approval later in the year.
8. The Committee also agreed it's work plan for the next three months, and this will be continually updated throughout the year as additional decisions are added to the Forward Plan, and reports are commissioned by the Committee.
9. The Committee would like to thank Cabinet Members and Officers for their work in supporting the Scrutiny Committee and Working Groups over the previous year, and to Officers for reviewing the arrangements for this municipal year. The Chair and Committee look forward to working with the Cabinet through the year, to offer support and scrutiny to the administration during a critical year for the Council.

Financial implications

10. Financial implications for the reports listed above were outlined within the reports presented at Scrutiny Committee or Working Group.
11. Where appropriate, any further financial implications were reviewed when considering the recommendations.

Legal issues

12. Legal implications for the reports listed above were outlined within the reports presented at Scrutiny Committee or Working Group.
13. Where appropriate, any further legal implications were reviewed when considering the recommendations.

Level of risk

14. Risk Registers, where appropriate, were linked to the reports presented at Scrutiny Committee or Working Groups.
15. Where appropriate, the risk register was reviewed when considering the recommendations.

Equalities impact

16. Equalities Impact Assessments, where appropriate, were linked to the reports presented at Scrutiny Committee or Working Groups.
17. Where appropriate, the Equalities Impact Assessments was reviewed when considering the recommendations.

Carbon and Environmental Considerations

18. Consideration for Carbon and Environmental impacts, where appropriate, were linked to the reports presented at Scrutiny Committee or Working Groups.
19. Where appropriate, the Carbon and Environmental impacts were reviewed when considering the recommendations.

Report author	Jonathan Malton
Job title	Committee and Member Services Manager
Service area or department	Law, Governance and Strategy
Telephone	07485 396185
e-mail	jmalton@oxford.gov.uk

This page is intentionally left blank