

To: Cabinet
Date: 17th September 2025
Report of: Director of Housing
Title of Report: Temporary Accommodation Placement Policy.

Summary and recommendations	
Decision being taken:	To approve the Temporary Accommodation Placement Policy.
Key decision:	Yes
Cabinet Member:	Councillor Linda Smith, Cabinet Member for Housing and Communities
Corporate Priority:	Deliver more affordable housing
Policy Framework:	Housing, Homelessness and Rough Sleeping Strategy

Recommendation(s): That Cabinet resolves to:	
1	Approve the Temporary Accommodation Placement Policy as set out in Appendix 1.
2	Delegate authority to the Director of Housing to make minor amendments to the policy in response to operational or legislative changes, in consultation with the Cabinet member for Housing and Communities.

Appendix No.	Appendix Title	Exempt from Publication
Appendix 1	Temporary Accommodation Placement Policy	No
Appendix 2	Operational Protocol – Temporary Accommodation	No

Appendix 3	Risk Register – Temporary Accommodation Placement Policy Implementation	No
Appendix 4	Equalities Impact Assessment – Temporary Accommodation Placement Policy	No

Introduction and background

1. Temporary Accommodation (TA) is short-term housing the Council must provide for households whom the authority has reason to believe are eligible, homeless and in priority need as prescribed under housing legislation.
2. Its purpose is to assist families and vulnerable households as they seek suitable long-term accommodation. This is a statutory obligation that the Council is required by law to fulfil.
3. The Council provides TA through properties it owns (via the Housing Revenue Account and General Fund), as well as through private sector leases. If required, accommodation may also be sourced on a nightly paid basis in B&Bs or hotels. Due to rapidly growing demand for TA, the Council in recent years has had to make more use of hotel and B&B placements.
4. Sometimes, households are placed outside of Oxford because the Council is unable to source enough suitable accommodation within the city. Staying in a B&B or out of the area can be difficult for people and often leads to requests for moves and complaints about placements. Given the increasing use of B&B accommodation both in and outside the City, the Council has now developed a policy to guide these decisions, in order to increase the transparency around decision making on placements and ensure consistency. The introduction of the Temporary Accommodation Placement Policy will help to ensure that Oxford City Council meets its statutory housing duties in a fair, transparent, and legally robust manner.
5. The need for such a policy is supported by the Homelessness Code of Guidance for Local Authorities, which advises that councils should have a clearly defined policy for allocating temporary accommodation, particularly when making out-of-area placements. This guidance is reinforced by the Supreme Court case *Nzolameso v Westminster City Council [2015] UKSC 22*, which established that local authorities must have a properly evidenced and consistently applied policy to justify placement decisions.
6. A lack of such a framework can expose Councils to legal challenges, inconsistent decision-making, and reputational risk. By adopting this policy, Oxford City Council strengthens its ability to meet statutory obligations under the Housing Act 1996, the Homelessness Reduction Act 2017, and the Children Act 2004, while safeguarding the rights and wellbeing of vulnerable residents.

Homelessness Demand

7. Oxford City Council continues to experience sustained and significant demand pressure on its temporary accommodation (TA) services. The number of households requiring TA has more than doubled over the past years, rising from 116 in March 2023 to 298 in May 2025. This increase reflects a combination of factors, including the cost-of-living crisis, rapidly rising private sector rents, and the ongoing shortage of affordable housing in Oxford and surrounding areas. These trends are being seen across the country, and in particular in more expensive housing markets in the south of England.

Households in Temporary Accommodation

Financial Year	Total Households at end of financial year
April 2022 to March 2023	116
April 2023 to March 2024	246
April 2024 to March 2025	275
April 2025 to 2026	298 (May)

Average weekly Temporary Accommodation placement rate

Financial Year	Weekly average
April 2022 to March 2023	4.38
April 2023 to March 2024	9.38
April 2024 to March 2025	9.42
April 2025 to March 2026	11.29 (Present)

8. Despite proactive measures to increase TA supply, with the City Council on course to grow its stock by an extra 200 units within a two year period to over 300 — through repurposing council-owned stock, entering into long-term leases with private landlords and registered providers, purchasing units, and expanding the use of the Emergency Housing Procurement Framework—the demand for TA continues to outpace available provision. This has resulted in increased reliance on out-of-area placements and the use of bed and breakfast accommodation, particularly for single-person households and some with complex needs.
9. The Council recognises that this level of demand is hugely challenging and presents both operational and financial impacts. In response, a range of mitigations have been implemented, including:
- Expanding the TA portfolio further through new acquisitions and leasing arrangements.
 - Improving move on by strengthening pathways into private rented and supported housing.
 - Enhancing prevention work to reduce the number of households entering TA.
 - With an expanding TA stock and continued use of B&B and out of area placements, it is now important we introduce a structured placement policy to

ensure fair, transparent, and legally compliant decision-making, supporting our wider mitigations.

Policy Details and Rationale

10. The Temporary Accommodation Placement Policy has been developed to respond to the growing and shifting demands for temporary housing while ensuring fairness, suitability, and legal compliance. This policy is structured around several core principles that guide how placements are made and ensure that every household receives accommodation that is appropriate to their unique circumstances.

11. Key features of the policy include:

- Prioritising Suitability: The policy sets out clear, legally compliant criteria for assessing suitability, considering factors such as household composition, medical and accessibility needs, proximity to education and employment, and safeguarding considerations. By focusing on these elements, the policy aims to minimise disruption, especially for vulnerable households, helps ensure households are placed in suitable accommodation factoring in their needs with what accommodation is available, and to support the wellbeing of all residents placed in temporary accommodation.
- Managing Out-of-Area Placements: While the Council's goal is to place households within the local area wherever possible, the policy outlines the circumstances under which out-of-area placements may be necessary such as limited availability or specific support needs and describes the safeguards in place to ensure households are consulted and supported throughout the process.
- Fairness and Consistency: The policy ensures that all placement decisions follow a transparent and equitable process, supported by regular reviews and ongoing consultation with service users. This approach is transparent and consistent so that every decision can be justified in accordance with established protocols and guidance.

12. The Temporary Accommodation Placement Policy will be implemented by the Housing Needs team, with oversight from senior officers within the Housing Services department. Operational delivery will be supported by regular case review meetings, where individual placements particularly those in bed and breakfast accommodation are monitored and assessed for suitability and potential move-on options.

Monitoring

13. The policy will be monitored through regular reviews and key performance indicators, with an initial review within 12 months of implementation and full reviews every three years. Feedback from service users and any changes in legislation or local needs will also inform ongoing adjustments to ensure continued effectiveness and compliance.

14. This structured approach ensures that the policy remains aligned with the Council's strategic objectives and statutory responsibilities, while maintaining transparency and accountability in its delivery.

Options Considered

15. **Option one (recommendation) - Create a formal policy:** The option being recommended is the formal adoption and implementation of the Temporary Accommodation Placement Policy. This approach was selected because it establishes clear procedures and criteria for making placement decisions, ensures transparency and legal compliance, and minimises the risk of inconsistent outcomes or legal challenges. By formalising the process, the policy promotes fairness, prioritises suitability and safeguarding vulnerable households, and enables the Council to meet its statutory obligations effectively.
16. **Option two – No formal policy, ad hoc placements:** Without clear policy leads to inconsistent, less transparent decisions that are hard to explain or improve. This lack of guidelines can hinder fairness, compromise protection for vulnerable groups, and create confusion for both staff and applicants. This also can lead to legal challenges

Other implications

17. In addition to the core recommendations, the implementation of the Temporary Accommodation Placement Policy may have wider implications that need to be considered. These include potential impacts on health and safety, human resources, crime and disorder, sustainability, and the environment. This section outlines any such implications to ensure that Cabinet is fully informed of the broader context and consequences of the proposed decision.
- **Health and safety:** The policy supports safe placements, particularly for vulnerable individuals.
 - **Crime and disorder:** Supports safeguarding by ensuring appropriate placements for at-risk households.

Financial implications

18. The cost of temporary accommodation is significant. The policy supports cost-effective placements and encourages the use of Council-owned or leased properties. Applicants are expected to contribute to costs, and housing benefit applications are encouraged.
19. The existing budget for the provision of temporary accommodation was significantly increased during the 25/26 budget setting round. However, based on current projections further additional budget may be required for future years. The creation of a policy will assist in the delivery of a more cost-effective service helping to mitigate the amount of additional budget required moving forward. This is part of a range of proposed mitigation measures to be implemented.

Legal issues

20. Legal Services have reviewed the policy to ensure compliance. The policy is based on the Council's legal obligations under the Housing Act 1996, the Homelessness Reduction Act 2017, and the Children Act 2004. It reflects guidance from the Homelessness Code of Guidance 2018 and ensures that the Council continues to meet its statutory duties to provide suitable accommodation, particularly for families with children, pregnant applicants, and those with specific support needs.

Level of risk

21. A risk register is attached (Appendix 3). Key risks include legal challenge and reputational damage if placements are deemed unsuitable.

Equalities impact

22. An Equalities Impact Assessment has been completed (Appendix 4). The policy promotes fairness and considers the needs of protected groups

Carbon and Environmental Considerations

23. Not applicable.

Report author	Kieran Edmunds
Job title	Rapid Rehousing Manager
Service area or department	Housing Services
Telephone	01865 602817
e-mail	kedmunds@oxford.gov.uk

Background Papers:	
1	Temporary Accommodation Placement Policy 2025 – Draft Policy Document
2	Temporary Accommodation Common Operational Protocol (2025)
3	Temporary Accommodation Demand and Mitigations Report
4	Temporary Accommodation Common Operational Protocol
5	Homelessness and Rough Sleeping Strategy 2023–2028
6	Nzolameso v Westminster City Council [2015] UKSC 22 – Supreme Court Judgment
7	Homelessness Code of Guidance for Local Authorities (MHCLG, 2018 – updated 2024)
8	Equalities Impact Assessment – Temporary Accommodation Placement Policy
9	Risk Register – Temporary Accommodation Placement Policy Implementation