



COMMUNITY AND WELLBEING COMMITTEE

Tuesday 8 July 2025 at 7.30 pm

Place: Council Chamber, Epsom Town Hall

Online access to this meeting is available on YouTube: [Link to online broadcast](#)

The members listed below are summoned to attend the Community and Wellbeing Committee meeting, on the day and at the time and place stated, to consider the business set out in this agenda.

Councillor Clive Woodbridge (Chair)	Councillor Rachel King
Councillor Bernice Froud (Vice-Chair)	Councillor Bernie Muir
Councillor Rob Geleit	Councillor Humphrey Reynolds
Councillor Graham Jones	Councillor Kim Spickett

Yours sincerely

Chief Executive

For further information, please contact democraticservices@epsom-ewell.gov.uk or tel: 01372 732000

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- You should proceed calmly; do not run and do not use the lifts;
- Do not stop to collect personal belongings;
- Once you are outside, please do not wait immediately next to the building, but move to the assembly point at Dullshot Green and await further instructions; and
- Do not re-enter the building until told that it is safe to do so.

Public information

Please note that this meeting will be held at the Town Hall, Epsom and will be available to observe live using free YouTube software.

A link to the online address for this meeting is provided on the first page of this agenda. A limited number of seats will be available on a first-come first-served basis in the public gallery at the Town Hall. If you wish to observe the meeting from the public gallery, please arrive at the Town Hall reception before the start of the meeting. A member of staff will show you to the seating area. For further information please contact Democratic Services, email: democraticservices@epsom-ewell.gov.uk, telephone: 01372 732000.

Information about the terms of reference and membership of this Committee are available on the [Council's website](#). The website also provides copies of agendas, reports and minutes.

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Exclusion of the Press and the Public

There are no matters scheduled to be discussed at this meeting that would appear to disclose confidential or exempt information under the provisions Schedule 12A of the Local Government Act 1972 (as amended). Should any such matters arise during the course of discussion of the below items or should the Chair agree to discuss any other such matters on the grounds of urgency, the Committee may wish to resolve to exclude the press and public by virtue of the private nature of the business to be transacted.

Questions and statements from the Public

Up to 30 minutes will be set aside for questions and statements from members of the public at meetings of this Committee. Any member of the public who lives, works, attends an educational establishment or owns or leases land in the Borough may ask a question or make a statement on matters within the Terms of Reference of the Committee.

All questions must consist of one question only and cannot consist of multiple parts. Questions and statements cannot relate to planning or licensing committees matters, the personal affairs of an individual, or a matter which is exempt from disclosure or confidential under the Local Government Act 1972. Questions which in the view of the Chair are defamatory, offensive, vexatious or frivolous will not be accepted. Each question or statement will be limited to 3 minutes in length.

If you wish to ask a question or make a statement at a meeting of this Committee, please contact Democratic Services at: democraticservices@epsom-ewell.gov.uk

Questions must be received in writing by Democratic Services by noon on the fifth working day before the day of the meeting. For this meeting this is **Noon, 1 July 2025**.

A written copy of statements must be received by Democratic Services by noon on the working day before the day of the meeting. For this meeting this is **Noon, 7 July 2025**.

For more information on public speaking protocol at Committees, please see [Annex 4.2](#) of the Epsom & Ewell Borough Council Operating Framework.

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Filming or recording must be overt and persons filming should not move around the room whilst filming nor should they obstruct proceedings or the public from viewing the meeting. The use of flash photography, additional lighting or any non-handheld devices, including tripods, will not be allowed.

AGENDA

1. QUESTIONS AND STATEMENTS FROM THE PUBLIC

To take any questions or statements from members of the Public.

2. DECLARATIONS OF INTEREST

To receive declarations of any Disclosable Pecuniary Interests or other registrable or non-registrable interests from Members in respect of any item to be considered at the meeting.

3. MINUTES OF THE PREVIOUS MEETING (Pages 5 - 8)

The Committee is asked to confirm as a true record the Minutes of the Meeting of the Committee held on 13 March 2025 (attached) and to authorise the Chair to sign them.

4. ADOPTION OF A REVISED HOUSING CIVIL PENALTY POLICY (Pages 9 - 36)

To determine a revised policy for the issuing of civil sanctions under the Housing and Planning Act 2016.

5. HEALTH AND WELLBEING STRATEGY 2025-2028 (Pages 37 - 72)

This report sets out the Council's intended Health and Wellbeing Strategy for 2025-2028.

6. AFGHAN REFUGEES (Pages 73 - 110)

The report sets out the Afghan Resettlement Programme (ARP) and proposes the Council's offer of accommodating eligible Afghan households and the provision of Transitional Accommodation.

7. URGENT DECISIONS (Pages 111 - 114)

To report to the committee two decisions taken by one of the Directors and / or Chief Executive on the grounds of urgency, in compliance with the requirements of the Constitution.

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Minutes of the Meeting of the COMMUNITY AND WELLBEING COMMITTEE held at the Council Chamber, Epsom Town Hall on 13 March 2025

PRESENT -

Councillor Clive Woodbridge (Chair); Councillor Bernice Froud (Vice-Chair); Councillors Rob Geleit, Graham Jones, Alison Kelly, Rachel King, Humphrey Reynolds and Kim Spickett

Officers present: Rod Brown (Head of Housing and Community), Rachel Epton (Community Development Manager), Arjan de Jong (Strategic Housing Manager), Lucy Buckland (Arts, Culture and Heritage Programme Officer), Sue Emmons (Chief Accountant) and Dan Clackson (Democratic Services Officer)

27 QUESTIONS AND STATEMENTS FROM THE PUBLIC

No questions or statements from were received from members of the public.

28 DECLARATIONS OF INTEREST

Arts, Culture and Heritage Strategy update

Councillor Rachel King, Other Interest: In the interest of openness and transparency, Councillor Rachel King declared that she runs a Girl Guides group which had been involved in the Community Murals painting project.

29 MINUTES OF THE PREVIOUS MEETING

The Committee confirmed as a true record the restricted minutes of the meeting of the Committee held on 8 October 2024 and the minutes and restricted minutes of the meeting of the Committee held on 16 January 2025, and authorised the Chair to sign them.

30 HEALTH AND WELLBEING STRATEGY 2025-2028

The Committee received a report setting out the Council's intended health and wellbeing strategy for 2025-2028.

The Committee considered the following matters:

- a) **Children's Engagement in Daily Activity.** A Member enquired as to whether the statistic stating that over 50% of children do not take part in the recommended minimum of an hour's physical activity per day was in

respect of time outside of school, i.e. evenings and weekends, or time including school hours. The Community Development Manager stated she understood that the statistic was in respect of time including school hours.

- b) **Partnerships.** The Committee considered the importance of building relationships with organisations such as the Integrated Care Partnership and Epsom Primary Care Network as the Council moved towards becoming part of a future unitary authority.
- c) **Wording Amendment.** The Committee considered that the sentence towards the end of the strategy, 'We shall also, in line with our responsibilities to our veterans...', could be reworded to replace 'veterans' with 'Armed Forces community'.

Following consideration, the Committee unanimously resolved to:

- (1) **Approve the draft Health and Wellbeing Strategy 2025-2028 as set out at Appendix 1 of the report.**
- (2) **Agree to the draft Strategy being taken to Public Consultation for a period of 6-weeks after the Committee meeting.**

31 HOMELESSNESS: EXPENDITURE AND ACTION PLAN UPDATE

The Committee received a report setting out the actions taken to minimise homelessness expenditure and identifying the funding to be utilised to cover the additional expenditure for 2024/25.

The Committee considered the following matters:

- a) **Effect of Local Government Reorganisation on Nightly Paid Accommodation.** In response to a question from a Member, the Strategic Housing Manager suggested that the process for housing people in nightly paid accommodation would likely remain unchanged following the formation of the Surrey unitary authorities. He explained that when selecting accommodation for people, there are requirements in place to ensure that accommodation is suitable, taking into consideration matters such as the standard of the accommodation and also the location.
- b) **Competition for Nightly Paid Accommodation.** In response to a question from a Member, the Strategic Housing Manager stated that Epsom & Ewell experiences competition for nightly paid accommodation due in part to its close proximity to nearby London boroughs. He stated that placing people in accommodation further out into Surrey can be challenging due to unavailability of accommodation and also because it can cause people to become separated from their support networks.
- c) **Modular Homes at Fairview Road.** In response to a question from a Member, the Chair stated that the Fairview Road modular homes scheme was progressing well, and it was anticipated that the accommodation units would be in place for Autumn.

- d) **Ministry of Housing, Communities and Local Government (MHCLG), Homelessness Prevention Grant (HPG) Allocation Consultation.** In response to a question from a Member, the Strategic Housing Manager stated that the HPG allocation formula included in MHCLG's consultation was anticipated to be beneficial for Epsom & Ewell, though suggested it might take c.6 months before an exact figure is known for how much the Council will receive.
- e) **MHCLG Additional Grant Funding 2025/26.** A Member enquired as to how the additional funding received from MHCLG could be utilised to alleviate homelessness in the Borough. The Strategic Housing Manager stated that typically a large part of the Homelessness Prevention Grant goes towards accommodation. He stated that more preventative measures were also being explored, with the possibility of taking on additional staff within the housing team, funded by the increased grant, being investigated.

Following consideration, the Committee unanimously resolved to:

- (1) **Note the priority action points which have been taken to manage homelessness over the past 6 months.**
- (2) **Note the use of Homelessness Prevention Grant (HPG) and Homelessness Grant reserves to cover the increase in expenditure, during 2024/25, to enable the Council to meet its duties under the Housing Act 1996 and Homelessness Reduction Act 2017.**
- (3) **Agree that a further update regarding nightly paid accommodation (NPA) expenditure be provided at the Community & Wellbeing Committee in October 2025.**

32 ARTS, CULTURE AND HERITAGE STRATEGY UPDATE

The Committee received a report setting out achievements of work delivered as part of the Council's Arts, Culture and Heritage Strategy between 2023 – 2025, and setting out a proposal of relevant funding streams and attributed work to support in the delivery of the Council's Arts, Culture and Heritage Strategy for 2025/26.

The Committee considered the following matters:

- a) **Epsom Playhouse.** The Committee considered the significance of the Playhouse as a cultural hub within the Borough and noted the recent arts, culture and heritage projects completed there, such as the mural paintings and the Evelyn Dove display, with further works planned for the future.
- b) **Link Between Arts, Culture & Heritage (AC&H), and Health & Wellbeing.** In response to a question from a Member, the Arts, Culture and Heritage Programme Officer stated that becoming part of the Community Development team had increased the opportunities for AC&H projects by enabling exploration of the health and wellbeing aspects of

AC&H, and had allowed the AC&H strategy to be more effectively synergised with the Health and Wellbeing strategy. The Committee considered the health benefits that art, culture and creativity can bring to people.

- c) **Musical Sculptures.** In response to a question from a Member, the Arts, Culture and Heritage Programme Officer explained that 10 musical sculptures were planned for installation in 3 of the Borough's parks. She explained that they would be acoustic sculptures, shaped as vibrantly coloured flowers, which emit a musical sound when their petals are knocked, providing a visual, sound and touch-based experience for park visitors.

Following consideration, the Committee unanimously resolved to:

- (1) **Note the achievements of works delivered as part of the Council's Arts, Culture and Heritage Strategy.**
- (2) **Note the proposal of relevant funding streams and attributed work to support in the delivery of the Council's Arts, Culture and Heritage Strategy for 2025/26.**

33 FEES AND CHARGES UPDATE REPORT

The Committee received a report recommending an additional fee for which the Committee is responsible and correcting the charge on a previously agreed fee, with both fees to be effective from 1 April 2025.

The report was published after the agenda publication date further to the Chair of the Community and Wellbeing Committee being of the opinion that it should be considered at the meeting as a matter of urgency – in order that a decision be made by Committee prior to 1st April 2025 – in accordance with Appendix 5, CPR 3.7 of the Epsom & Ewell Borough Council Constitution, and s.100B(4)(b) of the Local Government Act 1972.

Following consideration, the Committee unanimously resolved to:

- (1) **Agree the additional fee for hourly rates for standard room hire at Bourne Hall for 17:00 – 24:00, as set out at section 3.1 of the report.**
- (2) **Agree an updated fee for hourly rates for standard room hire at Bourne Hall for 09:00 – 17:00, as set out at section 3.2 of the report.**

The meeting began at 7.30 pm and ended at 8.01 pm

COUNCILLOR CLIVE WOODBRIDGE (CHAIR)

ADOPTION OF A REVISED HOUSING CIVIL PENALTY POLICY

Head of Service:	Rod Brown, Head of Housing & Community
Report Author	Oliver Nelson
Wards affected:	(All Wards);
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	
Appendices (attached):	Draft revised Civil Penalties Policy

Summary

To determine a revised policy for the issuing of civil sanctions under the Housing and Planning Act 2016.

Recommendation (s)

The Committee is asked to:

- (1) Approve and adopt the revised policy as set out in Annex 1 to this report**
- (2) Nominate and Authorise the Head of Housing and Community, Public Protection Manager, Principal Environmental Health Officer and Environmental Health Officer to determine individual financial penalties in accordance with this policy.**

1 Reason for Recommendation

- 1.1 To enable the Council to issue Civil Penalty Notices for certain housing offences both in respect of existing legislation and in respect of anticipated future legislation in the form of the Renters Rights Bill.

2 Background

- 2.1 The Council has statutory responsibility for the enforcement of acceptable conditions in borough housing stock, with the main focus being on the private rented sector. This function is discharged through the Environmental Health Team.

- 2.2 Where deficiencies are found, a range of enforcement tools exist to rectify the position. A criminal offence is created for breach or non-compliance with these provisions for which a prosecution may be considered.
- 2.3 However, via section 126 and Schedule 9 of the Housing and Planning Act 2016, a power was given to local housing authorities to impose a civil penalty of up to £30,000 as an alternative to prosecution for certain specified housing offences. The use of a civil penalty is an attractive option since it avoids the time, complexity, cost and lengthy delays of a criminal prosecution, with the Council able to retain 100 percent of the amount, using it to supplement its private sector housing function. It provides the landlord or other responsible person the opportunity to avoid a court trial and a criminal record.
- 2.4 It is expected that the measures contained in the current Renters Reform Bill, expected to receive Royal Assent over summer 2025, will require much more use of this facility.
- 2.5 The existing policy was adopted at the Committee's meeting of 23 January 2018 and it is proposed that the policy set out in appendix 1 replace this original version.
- 2.6 The new proposed policy is based on a standardised model, in use at an increasing number of local housing authorities and which has been drawn up using the very latest case law precedents. It is very robust, tested and resistant to challenge.
- 2.7 Whether a civil sanction is used in preference to any other disposal route is a function of the adopted enforcement policy and legal provisions on a case by case basis.
- 2.8 Appeals to decisions made through the operation of this policy are set out in statute and involve two possible stages.
 - 2.8.1 an initial proposal ("notice of intent"), to impose a sanction to which the recipient is invited to make written representations.
 - 2.8.2 A formal appeal to the First Tier Tribunal (FTT) in the event the recipient appeals the final notice.
- 2.9 In the event of non payment, the debt is recoverable via the normal county court procedure.

3 Risk Assessment

Legal or other duties

- 3.1 Equality Impact Assessment

3.1.1 These proposals will help improve the housing conditions and the life chances of people with protected characteristics including those living with various vulnerabilities. It is therefore possible to say there will be a positive impact on protected characteristics.

3.2 Crime & Disorder

3.2.1 Most landlords within the Borough are law abiding and keen to do the right thing. However we know there are a small number of criminal landlords operating in the area and vulnerabilities amongst those who are housed, for example, in multiply occupied dwellings.

3.3 Safeguarding

3.3.1 No direct impact arising directly from this report. However it is important to note that officers do encounter safeguarding issues within privately rented accommodation and are trained to recognise individuals who require safeguarding.

3.4 Dependencies

3.4.1 None.

4 Financial Implications

4.1 It is not appropriate to attach an income target to this area of work since income is not predictable. However, the increased use of civil sanctions enabled by this policy will lead to a growth in income in this service.

4.2 **Section 151 Officer's comments:** Income from any civil penalties may be retained, provided it is used to fund activities related to the enforcement of housing standards in the private rented sector.

5 Legal Implications

5.1 The enforcement policy sets out the council's approach to ensuring that acceptable housing standards are reached and by further enabling, where necessary, robust action against rogue landlords.

5.2 The Housing Act 2004 is the principal legislation regulating housing standards with the Housing and Planning Act 2016 adding the facility for civil sanctions. The Renters Rights Bill will also place a duty on Local Authorities to take enforcement action in relation to certain offences.

5.3 Any recommendation to prosecute a landlord would need approval from the Head of Legal Services and Monitoring Officer.

5.4 The Environmental Health Team are trained in working within legal frameworks. Enforcement action is guided by the existing enforcement policy which contains the principles of proportionality, accountability, consistency and transparency.

5.5 **Legal Officer's comments:** None save as stated above

6 Policies, Plans & Partnerships

6.1 **Council's Key Priorities:** The following Key Priorities are engaged:

- Safe and well

6.2 **Service Plans:** The matter is not included within the current Service Delivery Plan.

6.3 **Climate & Environmental Impact of recommendations:** None

6.4 **Sustainability Policy & Community Safety Implications:** None

6.5 **Partnerships:** None

6.6 **Local Government Reorganisation Implications:** The policy applies to Epsom & Ewell Borough Council only and it will be the responsibility of any successor authority to adopt a similar or differing policy as it sees fit. It is useful to note that as a model policy, it is already in use at a number of other authorities including some in the likely future geography covering the present Epsom & Ewell area.

7 Background papers

7.1 The documents referred to in compiling this report are as follows:

Previous reports:

- Community and Wellbeing Committee, 23 January 2018 – Civil Penalties under the Housing and Planning Act 2016 for Private Sector Housing Enforcement

Other papers:

- None



**Civil Penalties
under the
Housing and
Planning Act
2016 and The
Electrical
Safety
Standards in
the Private
Rented Sector
(England)
Regulations
2020**

Document Information and Approvals

Policy title: Civil Penalties under the Housing and Planning Act 2016 and The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020

Review frequency: Every 2 years or as new case law precedents are made

Review due date: August 2027

Service owner: Oliver Nelson

Corporate Plan Theme: Effective Council, Safe and Well

Document Approvals

Each revision requires the following approvals:

- Non-administrative updates: **Community and Wellbeing Committee**
- Administrative updates: **Public Protection Manager**

Revision History

Version No.	Revision Date	Revisor	Previous Version	Description of Revision
1	1 May 2025	O Nelson	-	Initial version

Impact Assessment and Consideration

Assessment Type	Required / Not Required	Date Completed	Impact Assessments and Considerations Comment	Completed By
Finance	x			
Legal				
Equality Impact Assessment	x			
Counter-fraud	x			
Health and safety	x			
Data Protection Impact Assessment	x			
Climate Change	x			

Introduction

This document outlines the Council's policy in setting the level of a civil penalty in each case where it has been determined to issue a civil penalty as an alternative to prosecution proceedings.

The Council considers the need for transparency and consistency in the discharge of its functions under the Housing Act 2004 to be of primary importance. The general objective of this policy is, therefore, to promote both transparency and consistency in the imposition of financial penalties under the 2004 and any successor Acts or regulations so that, for example, those managing and having control of rented properties in the Council (a) know how the Council will generally penalise relevant offences and (b) are assured that, generally, like cases will be penalised similarly, and different cases penalised differently. The further objectives of using financial penalties in particular as a means of enforcing the above offences are explained below.

The approach in this policy is to list the individual contraventions to which civil penalties shall be provided followed by the Council's policy for applying a penalty for each type of contravention. Where this legislative reference appears in this document, a comment as to the maximum court fine were the matter to be instead referred for criminal prosecution appears to aid a comparison to be made.

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. The policy should be read in conjunction with the current edition of the relevant enforcement policy.

Section 126 and Schedule 9 of the Housing and Planning Act 2016 provide local authorities with the power, through the insertion of section 249A Housing Act 2004, to impose a civil penalty as an alternative to prosecution in respect of the following offences under the Housing Act 2004:

- Failure to comply with an Improvement Notice [section 30]
- Offences in relation to licensing of Houses in Multiple Occupation (HMOs) under Part 2 [section 72]
- Offences in relation to the Selective Licensing of 'houses' under Part 3 [section 95]
- Failure to comply with an Overcrowding Notice [section 139]
- Failure to comply with a management regulation in respect of an HMO [section 234]

Regulation 11 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 provides local authorities with the power to impose a civil penalty in respect of breaches of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020. In addition, section 23 of the Housing and Planning Act 2016 provides that a civil penalty may be imposed in respect of a breach of a Banning Order.

The Council has the power to impose a civil penalty of up to a maximum of £30,000 for each separate offence. If multiple offenders have committed the same offence at the same property, a separate civil penalty can, and usually will, be imposed on each offender. In each case, the level of civil penalty imposed on each offender will be in line with this policy.

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Statutory Guidance

The Government has issued statutory guidance under Schedule 9 of the Housing & Planning Act 2016 entitled “Civil penalties under the Housing and Planning Act 2016. Guidance for Local Housing Authorities”. The Council has regard to this guidance in the exercise of their functions in respect of civil penalties.

Paragraph 3.5 of the statutory guidance states that ‘The actual amount levied in any particular case should reflect the severity of the offence, as well as taking account of the landlord’s previous record of offending’. The same paragraph sets out several factors that should be taken into account to ensure that the civil penalty is set at an appropriate level in each case:

- a) **Severity of the offence.** The more serious the offence, the higher the penalty should be.
- b) **Culpability and track record of the offender.** A higher penalty will be appropriate where the offender has a history of failing to comply with their obligations and/or their actions were deliberate and/or they knew, or ought to have known, that they were in breach of their legal responsibilities. Landlords are running a business and should be expected to be aware of their legal obligations.
- c) **The harm caused to the tenant.** This is a very important factor when determining the level of penalty. The greater the harm or the potential for harm (this may be as perceived by the tenant), the higher the amount should be when imposing a civil penalty.
- d) **Punishment of the offender.** A civil penalty should not be regarded as an easy or lesser option compared to prosecution. While the penalty should be proportionate and reflect both the severity of the offence and whether there is a pattern of previous offending, it is important that it is set at a high enough level to help ensure that it has a real economic impact on the offender and demonstrate the consequences of not complying with their responsibilities.
- e) **Deter the offender from repeating the offence.** The ultimate goal is to prevent any further offending and help ensure that the landlord fully complies with all of their legal responsibilities in future. The level of the penalty should therefore be set at a high enough level such that it is likely to deter the offender from repeating the offence.
- f) **Deter others from committing similar offences.** While the fact that someone has received a civil penalty will not be in the public domain, it is possible that other landlords in the local area will become aware through informal channels when someone has received a civil penalty. An important part of deterrence is the realisation that (a) the local authority is proactive in levying civil penalties where the need to do so exists and (b) that the level of civil penalty will be set at a high enough level to both punish the offender and deter repeat offending.
- g) **Remove any financial benefit the offender may have obtained as a result of committing the offence.** The guiding principle here should be to ensure that the offender does not benefit as a result of committing an offence, i.e. it should not be cheaper to offend than to ensure a property is well maintained and properly managed.

The factors detailed in the statutory guidance and policy aims will be considered by the Council when deciding where, within the Civil Penalties matrix below, a particular offence and penalty fall.

Other Policy Aims

The Council is mindful that despite its best efforts, many landlords may operate unlawfully for a significant period of time without detection, and only a proportion of landlords committing relevant offences will be discovered. The Council is, therefore, mindful that when deciding to impose a Civil Penalty, it should create an environment where it is clear to the offender and others that operating unlawfully as a landlord will be financially disadvantageous when compared to operating lawfully. The Council intends to create an environment where landlords engage with the Council's requests and demands fulsomely, openly and honestly. This helps create a level playing field which supports the aims of transparency and consistency. No landlord should be able to financially benefit from withholding information the Council deems relevant that is, or should be, in their control to disclose. It is expected that fulsome and complete supporting evidence is provided to support any Written Representations received in response to a Notice of Intent.

Civil Penalties Matrix

In determining the level of a civil penalty, officers will have regard to the matrix set out below, which is to be read in conjunction with the associated guidance. The matrix is intended to provide indicative 'starting level' under the various offence categories, with the final level of the civil penalty adjusted in each case, taking into account aggravating and mitigating factors the Council deems significant including, but not limited to, factors relating to the track record and culpability of the landlord and the actual or potential harm to the occupants.

In deciding what level of penalty to impose, officers will conduct the following four stage process:

1. Consideration of the seriousness of the relevant housing offence to identify a starting level of the penalty.
2. An assessment of the number of rental properties controlled or owned or managed by the landlord and/or their experience in the letting/management of property will be considered, which may have the effect of increasing or decreasing the penalty.
3. The aggravating and mitigating factors that may relate to a number of factors including, but not limited to, culpability, track record and harm will be considered, which may have the effect of increasing or decreasing the penalty.
4. If any of the Discounts, as set out below, apply, the penalty will be decreased.

Once the seriousness of the relevant housing offence has been identified, the starting level of the penalty will be identified using the table below with the headings 'Seriousness of offence' and 'Starting level [£]'. Consideration of the number and type of rental properties controlled or owned or managed may adjust the penalty.

Aggravating and mitigating factors

As described above, the Council will apply consideration to the presence of any aggravating or mitigating factors when coming to a view about the overall amount of penalty.

To reflect the seriousness of the offence(s) in question, the presence of one or more mitigating factors will rarely result in the penalty being decreased in excess of a total of £5000. In exceptional circumstances, officers may determine that the presence of one or more mitigating factors justify a decrease in the penalty in excess of £5000. The presence of numerous mitigating factors will not automatically be considered as exceptional circumstances.

The Council has not provided a list of mitigating factors in this policy because it acknowledges that there are myriad possible circumstances that might give rise to mitigation.

For each offence the aggravating factors fall into two categories – factors specific to the offence and generic factors. In this policy, examples of specific aggravating factors are set out per offence and examples of generic factors are set out as follows:

Generic aggravating features/factors

The Council will have regard to general factors in determining the final level of the civil penalty including, but not limited to:

- A previous history of non-compliance would justify an increased civil penalty. Non-exhaustive examples of previous non-compliance would include previous successful prosecutions [including recent convictions that were 'spent'], receipt of financial penalties, rent repayment orders, works in default of the landlord and breaches of regulations/obligations, irrespective of whether these breaches had been the subject of separate formal action.
- A failure to cooperate with a Council investigation. Non-exhaustive examples of failure to cooperate would include failing to comply with a s.16 Local Government (Miscellaneous Provisions) Act 1976 notice, failing to comply with a s.235 Housing Act 2004 notice, failing to provide a substantive response to a letter of alleged offence.
- Deliberate intent when committing the offence. Non-exhaustive examples of deliberate intent would include knowledge that the offence was occurring, committing the offence after relevant correspondence was sent by the Council.
- The number of residents placed at risk.
- Offending over an extended period of time i.e. 3 months or longer.
- Whether any vulnerable residents were in occupation at the time of the offence. Non-exhaustive examples of vulnerable residents include young adults and children, persons vulnerable by virtue of age, persons vulnerable by virtue of disability or sensory impairment, persons with a drug or alcohol addiction, victims of domestic abuse, children in care or otherwise vulnerable by virtue of age, people with complex health conditions, people who do not speak English as their first language, victims of trafficking or sexual exploitation, refugees, asylum seekers.

To ensure that any penalty imposed is proportionate to the offending behaviour the presence of one or more aggravating factors will rarely result in the penalty being increased in excess of a total of £5000. In exceptional circumstances, officers may determine that the presence of one or more aggravating factors justify an increase in the penalty in excess of £5000. The presence of numerous aggravating factors will not automatically be considered as exceptional circumstances.

The Council may, exceptionally, including for the reason given above, increase the penalty by greater than £5000 on account of aggravating factors or, again exceptionally, decrease it by greater than £5000 on account of mitigating factors. In order to meet the objectives of this policy, including the need for transparency and consistency in the use of such penalties, the Council will exercise its discretion to increase or decrease a penalty by greater than £5000 on account of aggravating or mitigating factors in exceptional circumstances only excluding any Discounts as set out below. The Council will consider on a case-by-case basis whether any such circumstances exist.

Seriousness of offence	Starting level [£]
Mild	2500
Moderate	7500
Serious	12500
Very Serious	17500
Severe	22500
Very Severe	27500

Table 1 – Matrix

Offences where a civil penalty may be levied as an alternative to prosecution and relevant considerations as to the level of that penalty

Failure to comply with an Improvement Notice - Section 30 of the Housing Act 2004

Maximum Court fine following prosecution that can be levied for failure to comply with an Improvement Notice - Unlimited

An Improvement Notice served under Part 1 Housing Act 2004 specifies repairs/improvements that the recipient should carry out in order to address one or more identified Category 1 and/or Category 2 hazards in a property. Category 1 hazards are the most serious hazards, judged to have the highest risk of harm to the occupiers; the Council has a duty to take appropriate action where a dwelling is found to have one or more Category 1 hazards present.

In some cases, the service of an Improvement Notice will have followed an informal stage, where the landlord had been given the opportunity to carry out improvements without the need for formal action. In such cases, an identified failure to comply with an Improvement Notice will represent a continued failure on the part of the landlord to deal appropriately with one or more significant hazards affecting the occupier[s] of the relevant dwelling.

The Council would view the offence of failing to comply with the requirements of an Improvement Notice as a significant issue, exposing the tenant[s] of a dwelling to one or more significant hazards.

The seriousness of the offence is viewed by the Council as being a Severe matter, attracting a financial penalty with a starting level of £22500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £17500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £22500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the

portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £27500.

Aggravating features/factors specific to non-compliance with an Improvement Notice

- The nature and extent of hazards that are present. Multiple hazards and/or severe/extreme hazards that are considered to have a significant impact on the health and/or safety of the occupant[s] in the property or their guests would justify an increase in the level of the civil penalty.

Generic aggravating features/factors

As set out above

Failure to License offences

Maximum Court fine following prosecution that can be levied for failure to license an HMO or Part 3 House – Unlimited

Failure to license a Mandatory 'HMO' – Section 72(1) of the Housing Act 2004

Under Part 2 Housing Act 2004, most higher risk HMOs occupied by 5 or more persons forming 2 or more households are required to hold a property licence issued by the local authority. HMO licensing was introduced to allow local authorities to regulate standards and conditions in high risk, multiply occupied residential premises. Through the property licence regime, local authorities ensure that the HMO has sufficient kitchens, baths/showers and WCs and place a limit on the number of persons permitted to occupy it and the licence holder is required to comply with a set of licence conditions.

The Council would view the offence of failing to license an HMO as a significant failing; Licensing was introduced by the Government in order to regulate management, conditions, standards and safety in the properties considered to represent the highest risk to tenants as regards such matters as fire safety and overcrowding.

This seriousness of the offence is viewed by the Council as being a Very Serious matter, attracting a financial penalty with a starting level of £17500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £22500.

Aggravating features/factors specific to failure to licence offences

- The condition of the unlicensed property. The nature and extent of any significant hazards that are present would justify an increase in the level of the civil penalty. Equally, an HMO that was found to be poorly managed and/or lacking amenities/fire safety precautions and/or overcrowded would also justify an increased civil penalty.

- Any demonstrated evidence that the landlord/agent was familiar with the need to obtain a property licence e.g. the fact that they were a named licence holder or manager in respect of an already licensed premises.

Generic aggravating features/factors

As set out above

Failure to Comply with an Overcrowding Notice – Section 139 of the Housing Act 2004

Maximum Court fine following prosecution that can be levied for failure to comply with an Overcrowding Notice – Unlimited

Section 139 Housing Act 2004 allows the Council to serve an Overcrowding Notice in respect of an HMO that is not required to be licensed under Part 2 Housing Act 2004. The notice specifies, on a room-by-room basis, the maximum number of persons allowed to occupy each room as sleeping accommodation or that the room is not considered suitable for that purpose.

The Council would view the offence of failing to comply with the requirements of an Overcrowding Notice as a significant matter, exposing the tenant[s] of an HMO to unacceptably cramped living conditions.

The seriousness of the offence is viewed by the Council as being a Very Serious matter, attracting a financial penalty with a starting level of £17500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £22500.

Failure to Comply with a Banning Order – Section 21 of the Housing and Planning Act 2016

Maximum Court fine that can be levied for failure to comply with a Banning Order following prosecution – Unlimited. In addition, the Court can also impose a prison sentence for up to 51 weeks.

The Housing and Planning Act 2016 includes provisions and processes for a person to be banned from being involved, for a specified period, in one or more of the following activities:

- Letting housing
- Engaging in letting agency work
- Engaging in property management work

Banning Orders are reserved for what are recognised as being the most serious housing-related offences. In the event that the Council was satisfied that the offence of breaching a Banning Order had occurred, this would normally be the subject of prosecution proceedings. Where it was determined that a civil penalty would be appropriate in respect of a breach of a Banning Order, this would normally be set at the maximum level of £30,000 to reflect the severity of the offence.

Failure to Comply with The Management of Houses in Multiple Occupation [England] Regulations 2006 and The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007

Maximum Court fine following prosecution that can be levied for failure to comply with each individual regulation - unlimited

The Management of Houses in Multiple Occupation (England) Regulations 2006 impose duties on the persons managing HMOs in respect of:

- Providing information to occupiers [Regulation 3]
- Taking safety measures, including fire safety measures [Regulation 4]
- Maintaining the water supply and drainage [Regulation 5]
- Supplying and maintaining gas and electricity, including having these services/appliances regularly inspected [Regulation 6]
- Maintaining common parts [Regulation 7]
- Maintaining living accommodation [Regulation 8]
- Providing sufficient waste disposal facilities [Regulation 9]

The Licensing and Management of Houses in Multiple Occupation (Additional Provisions) (England) Regulations 2007 impose duties on the persons managing HMOs as defined by Section 257 Housing Act 2004 in respect of:

- Providing information to occupiers [regulation 4]
- Taking safety measures, including fire safety measures [regulation 5]
- Maintaining the water supply and drainage [regulation 6]
- Supplying and maintaining gas and electricity, including having these services/appliances regularly inspected [regulation 7]
- Maintaining common parts [regulation 8]
- Maintaining living accommodation [regulation 9]
- Providing sufficient waste disposal facilities [regulation 10]

It is important that the manager of an HMO complies with all regulations, but the Council recognises that a failure to comply with certain regulations is likely to have a much bigger impact on the safety and comfort of residents than others.

Failure to comply with the duty of manager to provide information to occupier

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to provide information to occupier as a Mild matter, attracting a financial penalty with a starting level of £2500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £2000, attracting a civil penalty of £500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £2500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £2000, attracting a civil penalty of £4500.

Aggravating features/factors specific to Management Regulation breach offences

- The number and/or nature and/or extent of the management regulation breach(es) and/or the deficiencies within each regulation.

Generic aggravating features/factors

As set out above

Duty of manager to take safety measures

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to take safety measures as a Very Serious matter, attracting a financial penalty with a starting level of £17500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £22500.

Aggravating features/factors specific to Management Regulation breach offences

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

Generic aggravating features/factors

As set out above

Duty of manager to maintain water supply and drainage

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to maintain the water supply and drainage as a Serious matter, attracting a financial penalty with a starting level of £12500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £17500.

Aggravating features/factors specific to Management Regulation breach offences

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

Generic aggravating features/factors

As set out above

Duty of manager to supply and maintain gas and electricity

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to maintain the gas and electricity supply as a Serious matter, attracting a financial penalty with a starting level of £12500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £17500.

Aggravating features/factors specific to Management Regulation breach offences

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

Generic aggravating features/factors

As set out above

Duty of manager to maintain common parts, fixtures, fittings and appliances

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to maintain the common parts, fixture, fittings and appliances as a Moderate matter, attracting a financial penalty with a starting level of £7500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £2500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £12500.

Aggravating features/factors specific to Management Regulation breach offences

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

Generic aggravating features/factors

As set out above

Duty of manager to maintain living accommodation

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to maintain the living accommodation as a Moderate matter, attracting a financial penalty with a starting level of £7500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £2500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £12500.

Aggravating features/factors specific to Management Regulation breach offences

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

Generic aggravating features/factors

As set out above

Duty to provide waste disposal facilities

The Council would view the seriousness of the offence of failing to comply with the duty of the manager to provide waste disposal facilities as a Moderate matter, attracting a financial penalty with a starting level of £7500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing only one HMO dwelling and no more than one other dwelling that is not an HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £2500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £12500.

Aggravating features/factors specific to Management Regulation breach offences

As set out under 'Failure to comply with the duty of manager to provide information to occupier' above.

Generic aggravating features/factors

As set out above

Breach of licence conditions – Section 72(3) Housing Act 2004

Maximum Court fine following prosecution that can be levied for failure to comply with a licence condition - unlimited

All granted HMO licences impose a set of conditions on the licence holder. These conditions impose a variety of obligations relating to the letting, management and condition of the rented property.

It is important that the manager of a licensed property complies with all imposed conditions, but the Council recognises that a failure to comply with certain licence conditions is likely to have a much bigger impact on the safety and comfort of residents than others.

Failure to comply with licence conditions related to:

- Signage or the provision of information for tenants
- Provision of written terms of occupancy for tenants
- Procedures regarding complaints
- Procedures regarding vetting of incoming tenants
- Compliance with deposit protection legislation
- The recording and provision of information regarding rent payments
- Procedures relating to rent collection
- The provision of information regarding occupancy of the property
- The provision of information regarding change of managers or licence holder details
- The provision of information related to changes in the property
- The provision of information relating to a change in mortgage provider
- Requirements relating to the sale of the property
- Attending training courses
- Requirements to hold insurance

- The provision of insurance documentation
- The provision of or obtaining of suitable references
- The provision of keys and alarm codes
- Security provisions for access to the property
- The provision of suitable means for occupiers to regulate temperature

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Mild matter, attracting a financial penalty with a starting level of £2500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £2000, attracting a civil penalty of £500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £2500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £2000, attracting a civil penalty of £4500.

Aggravating features/factors specific to Licence Condition breach offences

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

Generic aggravating features/factors

As set out above

Failure to comply with licence conditions related to:

- Procedures and actions regarding Inspections
- Procedures regarding Repair issues
- Maintenance and use of common parts (including gardens, outbuildings and property exterior) and living areas
- Safeguarding occupiers and minimising disruption during works
- The provision of information regarding alterations and construction works
- Procedures regarding emergency issues
- Waste and waste receptacles, pests, minor repairs, alterations or decoration.
- Giving written notice prior to entry
- Allowing access for inspections
- Minimising risk of water contamination
- The compliance of furnishings or furniture with fire safety regulations

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Moderate matter, attracting a financial penalty with a starting level of £7500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £2500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £12500.

Aggravating features/factors specific to Licence Condition breach offences

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

Generic aggravating features/factors

As set out above

Failure to comply with licence conditions related to:

- The provision of documentation regarding energy performance certificates, fire detection and prevention, emergency lighting, carbon monoxide detection, fire risk assessments, gas installations, electric installations and appliances
- Notification of legal proceedings, contraventions and other relevant information that may affect a fit and proper person status
- Procedures and actions regarding ASB

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Serious matter, attracting a financial penalty with a starting level of £12500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £17500.

Aggravating features/factors specific to Licence Condition breach offences

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

Generic aggravating features/factors

As set out above

Failure to comply with licence conditions related to:

- Minimum floor areas
- Occupancy rates
- Occupancy of rooms or areas that are not to be used as sleeping accommodation
- Limits on number of households allowed to occupy the property or part of the property

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Very Serious matter, attracting a financial penalty with a starting level of £17500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £17500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £22500.

Aggravating features/factors specific to Licence Condition breach offences

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

Generic aggravating features/factors

As set out above

Failure to comply with licence conditions related to:

- The condition or existence of smoke alarms, carbon monoxide alarms, emergency lighting, gas installations, electric installations and appliances, fire detection or other fire safety features or requirements
- The prevention including provision of safe means of escape

The Council would view the seriousness of the offence of failing to comply with a licence condition relating to the bullet points directly above as a Severe matter, attracting a financial penalty with a starting level of £22500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £17500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £22500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £27500.

Aggravating features/factors specific to Licence Condition breach offences

- The number and/or nature and/or extent of the licence condition regulation breach(es) and/or the deficiencies within each licence condition breach.

Generic aggravating features/factors

As set out above

Failure to Comply with Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020

Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 impose duties on private landlords in relation to electrical installations. Regulation 3 is detailed below:

3. Duties of private landlords in relation to electrical installations

- (1) A private landlord who grants or intends to grant a specified tenancy must—
 - (a) ensure that the electrical safety standards are met during any period when the residential premises are occupied under a specified tenancy;
 - (b) ensure every electrical installation in the residential premises is inspected and tested at regular intervals by a qualified person; and
 - (c) ensure the first inspection and testing is carried out—
 - (i) before the tenancy commences in relation to a new specified tenancy; or
 - (ii) by 1st April 2021 in relation to an existing specified tenancy.
- (2) For the purposes of sub-paragraph (1)(b) "at regular intervals" means—
 - (a) at intervals of no more than 5 years; or
 - (b) where the most recent report under sub-paragraph (3)(a) requires such inspection and testing to be at intervals of less than 5 years, at the intervals specified in that report.
- (3) Following the inspection and testing required under sub-paragraphs (1)(b) and (c) a private landlord must—
 - (a) obtain a report from the person conducting that inspection and test, which gives the results of the inspection and test and the date of the next inspection and test;
 - (b) supply a copy of that report to each existing tenant of the residential premises within 28 days of the inspection and test;
 - (c) supply a copy of that report to the local housing authority within 7 days of receiving a request in writing for it from that authority;
 - (d) retain a copy of that report until the next inspection and test is due and supply a copy to the person carrying out the next inspection and test; and
 - (e) supply a copy of the most recent report to—
 - (i) any new tenant of the specified tenancy to which the report relates before that tenant occupies those premises; and

(ii) any prospective tenant within 28 days of receiving a request in writing for it from that prospective tenant.

(4) Where a report under sub-paragraph (3)(a) indicates that a private landlord is or is potentially in breach of the duty under sub-paragraph (1)(a) and the report requires the private landlord to undertake further investigative or remedial work, the private landlord must ensure that further investigative or remedial work is carried out by a qualified person within—

- (a) 28 days; or
- (b) the period specified in the report if less than 28 days, starting with the date of the inspection and testing.

(5) Where paragraph (4) applies, a private landlord must—

(a) obtain written confirmation from a qualified person that the further investigative or remedial work has been carried out and that—

- (i) the electrical safety standards are met; or
- (ii) further investigative or remedial work is required;

(b) supply that written confirmation, together with a copy of the report under sub-paragraph (3)(a) which required the further investigative or remedial work to each existing tenant of the residential premises within 28 days of completion of the further investigative or remedial work; and

(c) supply that written confirmation, together with a copy of the report under sub-paragraph (3)(a) which required the further investigative or remedial work to the local housing authority within 28 days of completion of the further investigative or remedial work.

(6) Where further investigative work is carried out in accordance with paragraph (4) and the outcome of that further investigative work is that further investigative or remedial work is required, the private landlord must repeat the steps in paragraphs (4) and (5) in respect of that further investigative or remedial work.

(7) For the purposes of sub-paragraph (3)(e)(ii) a person is a prospective tenant in relation to residential premises if that person—

- (a) requests any information about the premises from the prospective landlord for the purpose of deciding whether to rent those premises;
- (b) makes a request to view the premises for the purpose of deciding whether to rent those premises; or
- (c) makes an offer, whether oral or written, to rent those premises.

It is important that a private landlord complies with all aspects of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020, however, the Council recognises that a failure to comply with certain aspects of Regulation 3 is likely to have a much bigger impact on the safety and comfort of residents than others.

Failure to comply with Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 sections (3)(b), 3(d), 3(e)

The Council would view the seriousness of the offence of failing to comply with (3)(b), 3(d) or 3(e) of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 as a Mild matter, attracting a financial penalty with a starting level of £2500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £2000, attracting a civil penalty of £500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £2500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £2000, attracting a civil penalty of £4500.

Aggravating features/factors specific to Electrical Safety Regulations breaches of duty

- The number and/or nature and/or extent of the Electrical Safety Regulation breach(es) within each sub-regulation.
- Using an unqualified person lacking appropriate certification to carry out inspection, testing, investigative or remedial work.

Generic aggravating features/factors

As set out above

Failure to comply with Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 sections (1)(a), (1)(b), (1)(c), (3)(a), (3)(c), (5)(b), (5)(c)

The Council would view the seriousness of the offence of failing to comply with (1)(a), (1)(b), (1)(c), (3)(a), (3)(c), (5)(b) or (5)(c) of Regulation 3 of The Electrical Safety Standards in the Private Rented Sector (England) Regulations 2020 as a Serious matter, attracting a financial penalty with a starting level of £12500.

Under the Council's policy the civil penalty for a landlord controlling/owning/managing one or two dwellings, including no more than one HMO, with no other relevant factors or aggravating features [see below], will reduce by £5000, attracting a civil penalty of £7500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a significant property portfolio, being three, four, or five dwellings, and/or two HMOs, with no other relevant factors or aggravating features [see below], will attract a civil penalty of £12500.

Under the Council's policy, the civil penalty for a landlord controlling/owning/managing a large property portfolio, being six or more dwellings, and/or three or more HMOs and/or has demonstrated experience in the letting/management of property (irrespective of the size of the portfolio), with no other relevant factors or aggravating factors [see below], will increase by £5000, attracting a civil penalty of £17500.

Aggravating features/factors specific to Electrical Safety Regulations breaches of duty

- The number and/or nature and/or extent of the Electrical Safety Regulation breach(es) within each sub-regulation.
- Using an unqualified person lacking appropriate certification to carry out inspection, testing, investigative or remedial work.

Generic aggravating features/factors

As set out above

Process for imposing a civil penalty and the right to make representations

Before imposing a financial penalty on a person, the Council will give the person a Notice of Intent.

A person who is given a Notice of Intent may make written representations to the Council about the proposal to impose a financial penalty. Any representations must be made within a 28-day period, this period starting the day after the date on which the Notice of Intent was given. As the burden lies with the recipient of any such notice to explain why, exceptionally, the Council should, or should not, depart from the Civil Penalties Matrix and guidance above, the Council will expect the recipient of a Notice of Intent to explain and provide fulsome and cogent evidence to support the existence of any such circumstances when they make representations in response to the notice.

In the event of two or more persons receiving separate Notices of Intent for the same matter, it should be noted that acceptance/payment of a civil penalty by one person will not negate the Council's intention to impose a civil penalty on the second or further persons. Each person served with the Notice of Intent is considered individually liable to pay the civil penalty notified to them. It is therefore important that any recipient of a Notice of Intent takes the opportunity to make representations should they consider for any reason a civil penalty should not be individually imposed upon them.

After the end of the period for representations the Council will:

- (a) Decide whether to impose a financial penalty on the person, and
- (b) If it decides to impose a financial penalty, decide the amount of the penalty

In determining whether to impose a financial penalty, and the level of any penalty, the Council will consider any written representations received in the appropriate time period, and will also consider the totality principle.

Furthermore, an offender's compliance with the identified breach during the representation period would not, in itself, be reason for the Council to determine that the imposition of a financial penalty was inappropriate. However, compliance at that stage may be relevant with respect to any mitigating factors that could decrease the amount of any imposed financial penalty.

If, following the receipt of written representations and/or the expiry of the time period to make written representations, the Council decides to impose a financial penalty on the person, it will give the person a Final Notice imposing that penalty.

The Final Notice will set out and summarise:

- a) The amount of the financial penalty,
- b) The reasons for imposing the penalty,
- c) Information about how to pay the penalty,
- d) The period for payment of the penalty,
- e) Information about rights of appeal, and
- f) The consequences of failure to comply with the notice

Discounts

The Council will automatically apply the following discounted rates to any imposed financial penalties in the following circumstances:

- A discount of 15% of the original calculated financial penalty will be deducted from the penalty imposed in the Final Notice should the penalty be paid within a specified time period (normally 28 days).

Illustrative example

The landlord of a Mandatory HMO property fails to obtain a licence. They only operate two HMO properties and there are no other relevant factors or aggravating features. The offence is regarded as a Very Serious matter. Upon receipt of the 'Notice of Intent' to impose a £17500 financial penalty. Written representations are made to the Council.

On account of the written representations received by the landlord, the council imposes a financial penalty of £16000. In the event the landlord pays within the specified period a 15% discount is given so that the landlord makes a discounted payment of £13600.

HEALTH AND WELLBEING DRAFT STRATEGY 2025-2028

Head of Service:	Rod Brown, Head of Housing & Community
Report Author	Rachel Epton
Wards affected:	(All Wards);
Urgent Decision? (yes/no)	
If yes, reason urgent decision required:	No
Appendices (attached):	Appendix 1: Health and Wellbeing Strategy 2025-2028. Appendix 2: Equality impact Assessment

Summary

This report sets out the Council's intended Health and Wellbeing strategy for 2025-2028.

Recommendation (s)

The Committee is asked to:

- (1) **Approve the final Health and Wellbeing Strategy 2025-2028 as set out in Appendix 1.**

1 Reason for Recommendation

- 1.1 On 13th March 2025 a report was taken to the Community and Wellbeing Committee, setting out the Council's draft Health and Wellbeing Strategy 2025-2028
- 1.2 The Committee approved the draft Strategy and agreed to the council taking this to public consultation.
- 1.3 The outcome of the consultation has been represented in the final revision of the Health and Wellbeing Strategy 2025-2028, which is now being presented back to Committee for final approval.

2 Background

- 2.1 In October 2019, the Community and Wellbeing Committee approved the council's first Health & Wellbeing Strategy 2019-2023.
- 2.2 The Strategy was based on a comprehensive review of data that reflected local insights. It also considered the strategic priorities of the 10-year Surrey-wide Health and Wellbeing Strategy, and findings from the Joint Strategic Needs Assessment (JSNA); a significant body of work produced by Public Health, Surrey and overseen by the Joint Health and Wellbeing Board.
- 2.3 The Council's Strategy subsequently highlighted 5 key priorities for the borough:
 - Eating Well, getting active and reducing our alcohol consumption.
 - Living life to the full, whatever your age
 - Supporting vulnerable residents to live well
 - Supporting the mental and emotional wellbeing of our residents
 - Supporting our residents to stay connected
- 2.4 Unfortunately, the delivery of the Strategy was impacted by both the pandemic, and later, in February 2022, the Homes for Ukraine scheme; both saw council resources re-directed.
- 2.5 Since the first iteration of the Strategy, the council's involvement and partnership working alongside colleagues in health and the community and voluntary sector has continued to prosper. The council has continuously built and maintained strong and purposeful relationships across these sectors, and this has helped inform the council's revised draft strategy.
- 2.6 In 2022, the Pulling Together Programme commenced. This was an initiative by Surrey Downs Health and Care Partnership and attended by health and community leads operating across Surrey Downs. Its purpose was to draw on shared resources and address health and wellbeing inequalities across the area of Surrey Downs which covers the surrounding council areas of Epsom and Ewell, Mole Valley, Reigate and Banstead, and East Elmbridge.
- 2.7 Neighbourhood Boards were one initiative that came from the Pulling Together agenda and were tasked with bringing together agencies to identify priorities and agree on targeted actions.

- 2.8 The council chairs the Neighbourhood Board, with both the Integrated Care Partnership, and Epsom Primary Care Networks (PCN) in attendance. Whilst membership is currently being extended, this partnership has been vital in providing greater insights into the health of the borough via its population health data.
- 2.9 Relying on population health data from the NHS, and an in-depth review of other reliable data sources including (but not exhaustive of) the JSNA, Public Health, and the Office of National Statistics, the draft Strategy was presented to Committee on both the 16th January, and 13th March 2025, and subsequently approved for public consultation.
- 2.10 The draft Strategy proposed the following priorities:
- To improve the mental and emotional wellbeing of residents through:
- Improving access to physical health activity in the borough.
 - Creating opportunities for residents of the borough.
 - Supporting residents to build a connection with others.
- 2.11 And whilst intended to serve all residents, also proposed to focus on:
- Children and young people
 - Those who are impacted by the wider determinants of health
 - Those whose circumstance disproportionately impacts on their health and wellbeing.

Public Consultation:

- 2.12 The consultation launched on Friday 4th April and ran for 6-weeks. It closed at 5pm on Friday 16th May 2025.
- 2.13 The consultation questionnaire was available for completion online, and available in hard copy across 6 locations. This included Epsom Town Hall, Rainbow Leisure Centre, Epsom Methodist Church, Bourne Hall, The Wells Community Centre, and the Community and Wellbeing Centre. The Community Development Officer also held drop-ins at each of these locations.
- 2.14 The questionnaire was also available at several GP surgeries across the borough, for return by post.
- 2.15 The Council received 114 responses in total.
- 2.16 The proposed Strategy received a high level of public support with the following observed:

- For the priorities shown in 2.10, on average, just over 90% of respondents agreed or strongly agreed with the priorities identified.
 - For the areas of focus shown in 2.11, on average, just over 70% of respondents agreed or strongly agreed with the areas of focus identified.
- 2.17 However, of note, 65% of respondents felt that the council needed to consider more groups than those listed in the draft Strategy.
- 2.18 Older residents, those with disabilities and those who are isolated featured the most heavily in respect of the groups that respondents asked the council to take into wider consideration.
- 2.19 The council has subsequently reviewed this feedback and has responded to this feedback as follows:
- The council upholds the position that issues relating to isolation will be addressed in its strategic intention to *support residents to build connections*. As such, no changes have been made to the Strategy in this regard.
 - In respect of those with disabilities, the draft strategy reflected those with a learning disability. The council has however been more explicit by incorporating those with physical disabilities into long-term health conditions.
 - In respect of older residents, the council has responded by the inclusion of older residents in the Strategy. The council accepts that by doing so we will also further bolster our commitment to addressing those impacted by isolation, disability and digital exclusion.
- 2.20 The full details of the public consultation, including the engagement under-taken, the demographics of those who responded, and the feedback/results received, are provided within the Equality Impact Assessment that can be found in Appendix 2.
- 2.21 An action plan will be developed to support the delivery of the strategy.

3 Risk Assessment

Legal or other duties

3.1 Equality Impact Assessment

3.1.1 The council accepts that in the development and delivery of the Health and Wellbeing Strategy, there will be impact on residents who have protected characteristics under the Equality Act 2010. It is of note however that the Strategy is likely to have a positive or neutral impact on those residents.

3.1.2 In recognition of the potential impact of the strategy the council has produced an Equality Impact Assessment, and this is contained in Appendix 2.

3.2 Crime & Disorder

3.2.1 The development of the Health and Wellbeing Strategy may have an indirect and positive impact on crime and disorder where projects are delivered that incorporate:

- Diversionary activities for residents that promote engagement in the community, and steer away from participating in crime and disorder.
- Increased access to support services for those at risk of, or who have previously offended.
- Priorities from other services areas (such as Community Safety), that also under-pin the aims and objectives of the revised Health and Wellbeing Strategy.

3.3 Safeguarding

3.3.1 In the delivery of the revised strategy the council accepts that projects and initiatives will specifically serve vulnerable residents, children and young people.

3.3.2 The council will continue to ensure its safeguarding duties to report safeguarding concerns, and under-take due diligence in working with delivery partners is maintained.

3.4 Dependencies

3.4.1 In the delivery of the revised strategy, the council would seek to work in partnership with other agencies. This would include, but would not be exhaustive of:

- Community and Voluntary Sector Partners.
- Health Partners and Primary Care Networks.
- Statutory services.
- Local business where applicable.

3.4.2 The council will also work closely with internal departments in the drafting of the strategy as applicable.

3.4.3 The council will also work with Neighbourhood Boards (as stated in 2.7), as to ensure the effective utilisation of population health data.

3.5 Other

3.5.1 None

4 Financial Implications

4.1 Any projects and initiatives that are to be under-taken in the connection with the finalisation and delivery of the strategy will need to rely on:

- The councils allocated revenue budget
- Applications for Bid funding
- Central Government grant funding where applicable.
- Reserves where applicable and subject to further approval.

4.2 **Section 151 Officer's comments:** There is currently no direct revenue or capital impact from this decision. Any changes that may require resources to implement the strategy will be reviewed and reported back to the committee.

5 Legal Implications

5.1 The legal implications are considered in section 3 of this report. There are no further considerations for the purpose of this report.

5.2 **Legal Officer's comments:** None for the purposes of this report

6 Policies, Plans & Partnerships

6.1 **Council's Key Priorities:** The following Key Priorities are engaged:

- The revised Health and Wellbeing Strategy will engage the Council's key priorities of: Safe and Well, Opportunity and Prosperity and Smart and Connected.

6.2 **Service Plans:** The matter is included within the current Service Delivery Plan.

6.3 **Climate & Environmental Impact of recommendations:** Potential for positive links with actions within the climate change action plan including on providing practical help to vulnerable and disabled people to improve energy efficiency in their homes and reduce fuel poverty and improving access to physical health activity could link with active travel initiatives.

- 6.4 **Sustainability Policy & Community Safety Implications:** Community Safety Implications are considered in section 3.2 of this report. There are no other considerations.
- 6.5 **Partnerships:** The partnerships are as identified in section 3.3 of this report.
- 6.6 **Local Government Reorganisation implications:**
- 6.7 The term of the strategy will extend to beyond 2027, when it is anticipated that Epsom and Ewell will form part of a unitary authority. The Council fully intends to proceed with its delivery of the strategy until this time, however it is acknowledged that this will have implications for its delivery of the in the final year.
- 6.8 Whilst the local data and insights contained in the strategy are reflective of the borough's health and wellbeing needs, the priorities identified in the strategy are broadly aligned to what has been observed across the County, and by Surrey Downs Health and Care Partnership.
- 6.9 As such, the strategy may help inform any health and wellbeing initiatives, across a future unitary.
- 6.10 **Background papers**
- 6.11 The documents referred to in compiling this report are as follows:

Previous reports:

- [Community and Wellbeing Committee Report – 19th October 2019: Health and Wellbeing Strategy 2019-2023](#)
- [Community and Wellbeing Committee Report – 16th January 2025 Health and Wellbeing Priorities 2025-2028.](#)
- [Community and Wellbeing Committee Report – 13th March 2025: Health and Wellbeing Priorities 2025-2028.](#)

Other papers:

- None

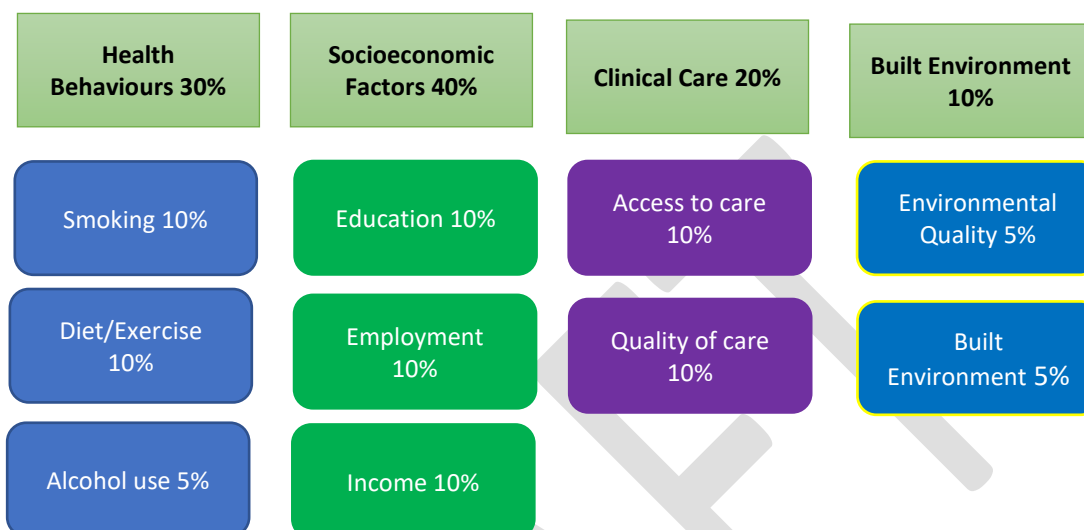
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Epsom and Ewell Borough Council
Health and Wellbeing Strategy 2025-2028

Introduction and background:

The Council's first Health and Wellbeing Strategy 2019-2023 was approved by the Community and Wellbeing Committee in October 2019. The Strategy was under-pinned by local data, and took into consideration the wider determinants of health, and the finding that in respect of health outcomes, only 20% is attributable to clinical intervention. With health behaviours, socioeconomic factors, and our surroundings, having the most influence on our health.



At the time, the 2019-2023 Strategy highlighted a 7-year life expectancy gap between those living in more affluent and green areas of the borough, in comparison to those who live in less affluent and more population dense areas. Such a health inequality being attributable to the wider determinants as set out above.

The Council's Strategy subsequently set out 5 priorities:

- Eating Well, getting active and reducing our alcohol
- Living life to the full, whatever your age
- Supporting vulnerable residents to live well
- Supporting the mental and emotional wellbeing of our residents
- Supporting our residents to stay connected

There was a focus on developing initiatives for those who were most impacted by health inequality, with an action plan being developed.

The delivery of the Strategy was however impacted by the Covid 19 Pandemic. This saw Council resources diverted to providing vital services to vulnerable residents and those shielding. Further to this, over the course of 2021 and 2022, the Council responded to the conflicts in Afghanistan and Ukraine, by administering the Governments refugee schemes, welcoming those affected to the borough.

Consequently, a majority of the of the projects that have been delivered against the Strategy were achieved from late 2022, through until after the Strategy expired.

The current health and wellbeing landscape

Epsom and Ewell is a vibrant and green borough, where residents are able to enjoy good health outcomes and capitalise on the wealth of opportunity the borough affords.

86.5% of residents report to be in very good, or good health

As we move to deliver the next iteration of the Strategy however, it continues to be widely acknowledged that those whose health was most negatively impacted by the pandemic, are those who were already experiencing poor health outcomes due to socio-economic factors. The cost-of-living crisis has further compounded this and therefore we wish to ensure that the revised Strategy retains its focus on those who experience the greatest health inequalities in the borough; both in respect of mental and physical health outcomes.

In response to the pandemic, the Council became a contributor to the Pulling Together Programme. This programme was led on by Surrey Downs Health and Care Partnership, and sought to bring health partners, district and borough representatives, and the community and voluntary sector together with the aim of addressing health and wellbeing inequalities across the geography.

Subsequent to the Pulling Together Programme, Neighbourhood Boards were formed in 2023, with the Council currently chairing their local board. The board is formed with the Primary Care Networks (a network of GP surgeries throughout the borough) and seeks to address the health and wellbeing of residents. The purpose of the board is to bring about an improved understanding of the health of the borough's population, to share knowledge and resources and to agree priority areas of work that may have the most impact on our communities. The early work of the board has helped inform this Strategy.

The Council also continues to work closely alongside the community and voluntary sector, both as part of the work of the Neighbourhood Board, and in a wider capacity from hosting the community and voluntary sector forum, through to the delivery of multiple projects across the borough. This sector continues to provide valuable insights into where the Council should be focusing their efforts in improving the quality of life for residents, whilst delivering incredible outcomes. The Council has reflected on the collective views of this sector in the development of this Strategy and continues to value these partnerships.

Corporate plan:

In the revised strategy, the Council remains aligned with its corporate priorities and annual plan, ensuring the wellbeing of residents by promoting safety, health, opportunity, and prosperity. Through this Strategy we shall place a greater emphasis on connectivity, further enhancing the impact of the Strategy.

We will also recognise the value, and the role arts, culture and heritage can play in improving the health and wellbeing of residents. This will help increase our reach by enhancing the opportunity for creativity in improving health and wellbeing outcomes. As such, this Strategy will align to the priorities in the Council's Arts, Culture and Heritage Strategy, and bolster nurturing talent, the economic growth within our communities, and inclusivity and access for all in the project delivery.

Our Health and Wellbeing Priorities

The Council has identified a key strategic aim, and 3 additional priority areas to be the focus of the Strategy over the next 3-years and these are summarised as follows:

Our key strategic aim:

Improving the mental and emotional wellbeing of residents.

This will be achieved by delivery against 3 priorities:

- 1) Increasing activity levels across the borough
- 2) Creating opportunities for residents of the borough
- 3) Supporting residents to build a connection with others

And whilst the Council will deliver a Strategy that serves all residents, our efforts will focus on:

- Children and young people (CYP)
- Older residents
- Those residents impacted by the wider determinants of health and,
- Those whose life circumstance may disproportionately impact on their health and wellbeing.

The role of Arts, Culture and Heritage:

We also recognise the positive impact that art, culture and heritage can have in improving our sense of wellbeing, relieving stress and bringing about a sense of connection and purpose.

As such, this Strategy will be delivered in synergy with the Council's Art, Culture and Heritage Strategy, supporting a holistic and inclusive approach to improving the health and wellbeing of residents through a broad range of initiatives.

Our key strategic aim: Improving the mental and emotional wellbeing of residents.

Most of us recognise the importance of good mental and emotional wellbeing in our daily lives.

Good mental health supports our resilience, helps us make positive life choices, and engage in healthy relationships and behaviours. It can help with a sense of purpose and drive us towards our aspirations. Good mental health also drives our health behaviours and not only prevents ill-health but also helps us manage long-term conditions, leading to better health outcomes.

The interplay between the wider determinants of health and that of mental and emotional wellbeing is widely acknowledged. We know that people who engage in positive health behaviours, have strong social connections and support systems, are in a good standard of education or employment are free to enjoy their built environment and open spaces, and experience better mental health than where these determinants are lacking.

Where there is the loss of employment, or low-quality employment, especially where the situation is enduring and combined with additional socio-economic factors (including a lack of support), we are likely to experience worse mental health outcomes.

Surrey's Joint Strategic Needs Assessment (JSNA) for example, has highlighted the significance of the pandemic and the current cost of living crisis in respect of poor mental health. The JSNA cites that:

- Around 60% of those who had 3 or more debts experienced mental health problems.
- People experiencing debt are also 3 times more likely to consider suicide.
- The greatest predictor of good mental health in response to the pandemic, was employment and income.

Surrey's JSNA reports the finding that 'multidisciplinary interventions' (including improving education and employment opportunities and reducing social isolation) were found to offer the best outcomes for those with mental health problems.

What the mental health and wellbeing in our borough currently looks like:

At the time of the last strategy, the prevalence of depression was 9.3% and currently it stands closer to 11.9%. The 4th highest rate in Surrey.

We also have the lowest rating for 'happiness' at a score of 7.1 out 10. This represents a decrease of 0.7 since a 2020 survey.

We are 10th out of the 11 districts and boroughs for 'feeling worthwhile' with a rating of 7.5 out of 10. This represents a decrease in feelings worthwhile of 0.9 since 2020

Over the last 3-years the borough has also seen its suicide rates spike at 14 per 100,000 of the population, and the highest rate in Surrey. Whilst new data shows this has decreased, we shall up-hold the position that one life lost is too many and keep the mental wellbeing of residents at the core.

Whilst we acknowledge the causal relationship between mental wellbeing and the wider determinants—and recognise that mental health issues can contribute to unemployment—this strategy takes a holistic approach. Its ultimate aim is to improve mental health and emotional wellbeing by promoting activity, opportunity, and connection.

1: Improving access to physical health activities in the borough.

We know the benefits of physical activity on mental and emotional wellbeing, and that those who engage in higher levels of activity, report higher levels of happiness than those who are inactive.

In a Sport England report (2022-23) on *Understanding the impact of movement on mental health and wellbeing*, they report a direct correlation between self-reported happiness, and increased rates of activity:

Those who engaged in 150-minutes of activity per week reported a happiness rating of 7.2 out of 10 in comparison to a rating of 6.5 for those who engaged in 30-minutes or less. To put in simply, more exercise leads to us feeling happier!

Surrey's Joint Strategic Needs Assessment reports 28% of people with a mental health problem are physically inactive in comparison to 21% of the general population

Epsom and Ewell have long reported high rates of activity, both in adults and children. At the time of drafting the 2019-2023 strategy we were the 3rd most active borough. This remains relatively stable with it being estimated that:

76% of over 19-yr olds are engaging in the recommended level of activity of 150-minutes each week as reported for 2023.

Whilst this is a high rate of activity, it remains the case that:

15.4% of adults over 19yrs old are physically inactive and doing less than 30-mins of activity per week for 2023. This equates to approximately 9,400 residents.

Children are also recorded as engaging in the following levels of activity with the borough being ranked 9th of the 11 districts and boroughs:

43.8% of children are engaging in the recommended 60-minutes per day. This means over 50% of the borough's children are not doing enough activity

We know the importance of activity across a life-span, and that we are more likely to continue to engage in activity the earlier we start. Activity can also help us prevent and manage long-term conditions and steer us towards a healthy older age.

We also know that approximately 11.3% of the adult population in the borough report at least two long-term health conditions, with one being related to a muscular skeletal issue; that 13.7% have high blood pressure, and 6% have diabetes. Combined with the borough's lowest rating for self-reported happiness, the role of physical activity in preventing and managing long-term health conditions, as well as enhancing emotional wellbeing, is well established and will be a key focus of our strategy.

2: Creating and promoting opportunities for residents of the borough.

People who have opportunities and choices in life experience better health and wellbeing outcomes than those who, by circumstance, are not always able to access the opportunities life affords us.

We know that barriers to opportunity are strongly associated with the wider determinants of health. For example, individuals on low incomes, or those experiencing unemployment may not be able to access social or physical activities that improve their mental and physical health. They may not be able to explore further education, improve their home environment, or simply have access to the resources they need to progress such as a laptop or car.

We also know that those on low incomes and experiencing unemployment may also be faced with additional life challenges, such as caring responsibilities or a disability, making opportunities even more difficult to explore.

The 2021 census reports a combined total of 4.6% for working age adults recorded as economically inactive (other), or economically inactive on grounds of being on long-term sick or disabled and 6.2% of working age adults were working in routine occupations, associated with low incomes

Where unemployment or low incomes are further compounded by significant debt and poverty, we see a further decline in mental and physical health outcomes, that can make it even harder to secure, sustain or progress in employment or education.

17.5% of residents have struggled to pay a utility – ranking us 8th of the 11 districts and boroughs

Skills and education gaps can also contribute to reduced opportunities and perpetuate the cycle of low income or unemployment. Whilst Epsom and Ewell has high rates of attainment overall, it remains that case that:

22% of residents in Epsom and Ewell are recorded as having ‘very low’ digital skills

In the 2021 census 12.8% of those over 16-years old were recorded as having no qualifications

We will therefore look to promote the opportunities that already exist for all within the borough, whilst working with partners to explore improving access to employment, education, skill-development for those who face barriers. This may include learning through work experience, volunteering, sports and activities, with the aim of bringing about achievement.

We will work to enhance the digital skills of residents, recognising that digital skills enhance our chances of securing employment and education, maintaining connections, and accessing services, including vital healthcare provision; all of which improve health outcomes and reduce inequality.

Opportunities will also be fostered by ensuring residents understand where and how they can access community resources and support; both in respect of educational and employment opportunities, but also where they can seek support to address the barriers that prevent progression in the first instance. Further work with the Neighbourhood Board and with our community and voluntary sector, will be under-taken to explore initiatives that help residents facing the greatest barriers, secure the right support, reduce inequality and clear a path towards improving their prospects and health and wellbeing outcomes.

3: Supporting residents to build a connection with others.

Research indicates that socially isolated people are more likely to smoke, and in the absence of smoking, are likely to be less active and engage in other risk-taking health-behaviours that can increase the risk of stroke and cardio-vascular disease. Isolated people are also twice as likely to develop dementia and there is a strong correlation between experiencing social isolation and feelings of loneliness, and depression and anxiety.

This may be further compounded where feelings of stigma pertaining to loneliness are present.

In Epsom and Ewell 5.1% of the population report feeling lonely often or all the time.

The prevalence of depression is 17% in the loneliest areas of the borough, in comparison to 10% in the least lonely.

The prevalence of anxiety is 10.8% in the loneliest areas of the borough, in comparison to 6.4% in the least lonely.

Areas of Town, Court and Ruxley are the loneliest.

The Marmalade Trust states that research shows that more people live alone than ever before, and that our sense of belonging to neighbourhoods has fallen and 36% of people in the UK feel lonelier now than before the pandemic.

In 2021, there were 31,321 households in Epsom and Ewell. Of these 24.3% are recorded as a person living alone. This represents 7,611 people who are currently living alone.

Loneliness and isolation is not just connected to living alone nor is it simply attributable to getting older. More young people are reporting feelings of loneliness and isolation. A report by the Mental Health Foundation showed that, in the UK, 7% of young people aged 18-24 report being lonely all of the time, in comparison to 2% of those aged over 55.

Epsom and Ewell has nearly 24,000 children and young people living in the borough

In addition, isolation and loneliness can also be most felt in marginalised groups, by those that provide care for another person, those who lack support systems and those who are unable to socialise due to illness, mobility issues or financial constraints.

This Strategy will therefore seek to create opportunities for residents to build social connections that are based on shared interests and offer meaningful connections. We will look to encourage engagement in health and wellbeing activities that are already available, whilst also looking to work with partners to develop new activities that bring about a greater sense of wellness; such activities will draw on the benefits of creativity, movement and the accessing of green spaces, with the aim of reducing barriers for those who have previously felt marginalised.

We also recognise the benefits of community engagement on reducing isolation:

34.2% of residents had engaged in unpaid work that benefited their community in comparison to Waverly, who reported a rate of 46%.

We know how acts of kindness and community cohesion can give us a sense of purpose and connection, and as such we will look to identify ways to increase resident participation in community projects and initiatives. Finally, we shall work to reduce the stigma that surrounds loneliness.

Who we shall prioritise.

We will seek to deliver a Strategy that offers opportunities for all residents, and across of all ages, as to support health and wellbeing across a lifetime. However, we shall pay particular attention to the following:

Children and Young People (CYP).

We know that good mental health begins from a very young age, and that the absence of good mental health in children and young people can have implications on learning, self-esteem, confidence and being able to take advantage of life's opportunities. We also know that engaging in physical activity from an early age help to build a consistent approach to exercise and helps improve feelings of self-esteem and wellness.

Surrey Children and Young People's Emotional Wellbeing and Mental Health Strategy 2022-2027 reports a significant increase in demand for mental health support, with evidence suggesting that 10–15-year-olds have the greatest need.

In the first quarter of 2021, the mental health service, MindWorks received over 2400 referrals for mental health support across Surrey for 10–15-year-olds. Whilst the data is not available for Epsom and Ewell specifically, increased demand is seen across all the districts and boroughs.

The same Strategy also states that the pandemic had a greater impact on CYP mental health than their physical health, with 18-25-year-olds experiencing the greatest impact.

In Epsom and Ewell, we have approximately:

6,400 are aged 10-15-years old

7,500 are aged between 16-24yrs old.

With the exclusion or suspension from educational establishments in CYP with mental health problems being up to three times higher than their peers this can have a significant impact on young resident's future. It may present barriers to opportunities which can further perpetuate poor mental and physical health outcomes in the future. This places greater impetus to deliver a strategy that holds focus on CYP.

Delivering against our 3 key priorities, and learning from previous Strategies, The Council will endeavour to work with relevant educational establishments and organisations to reach those CYP who require additional support Looking at initiatives that promote confidence, self-esteem and a sense of autonomy as well as peer cohesion.

Older residents of the borough:

Epsom and Ewell continue to have a growing aging population:

In 2011, the borough had a population of approx. 75,100 of which 12,616 residents were over 65-years of age (16.8%) In 2022, the Office of National Statistics showed the borough had a population of approx. 81,300 of which 14,877 were over the age of 65-years (18.3%)

As with CYP, we know that older residents of the borough are more likely to be impacted by reduced amounts of activity and experience less of an opportunity to build a connection with others; this is especially the case with those unable to leave their home. Such circumstances can lead to physical health problems, as well as low mood, depression and is known to contribute to, and worsen the impact of dementia.

In 2025, Epsom & Ewell is likely to rank 4th worst for depression rates in those over 65-years

In January 2024, 617 residents of the borough were diagnosed with dementia, with estimated prevalence being 1072. In January 2025, 633 were diagnosed with dementia with the estimated prevalence being closer to 1092. This represents an increase of 2.6% in those case diagnosed in one year.

The lack of connection within older residents can be further impacted by the effects of digital exclusion. The use of technology, especially since the pandemic, has grown exponentially and for the borough's older residents, accessing, and receiving information about healthcare has become increasingly difficult.

We also need to acknowledge that and that for some, retirement or a reduced capacity to work may be attributed to worse health outcomes as income reduces. Access to transport, activities and essential services (all of which help us stay well and connected to others), can cost and whilst there are those that experience a comfortable retirement, others are not fortunate to be in this position.

As shown below, the wards of Court, Town and Ruxley experience the highest levels of deprivation. Within these wards:

2,599 (13%) of residents living in these 3 wards are aged over 65-years old

We will therefore look to work with the community and voluntary sector, Council services, and Primary Care Networks to help develop and deliver initiatives that focus on improving activity and connection for older residents. We shall focus on access to services, including how we improve digital access and on reducing isolation in line with our three strategic priorities.

Those who are impacted by the wider determinants of health.

Health inequalities are preventable health conditions that are found to be disproportionately represented in some groups of people. These inequalities effect not only impact on life expectancy, but also on lives lived in 'good health'.

There is recognition that health inequalities are perpetuated by social and economic factors which put simply, means that some of our residents are more likely to experience poor health and wellbeing outcomes, based simply on the quality of their social support network, their economic status, and their subsequent living environments.

In Epsom and Ewell, we have three wards that are listed as housing the most deprived households:

Town, Court and Ruxley.

These 3 wards have an approximate population of 19,800 people, living in 8,100 households.

Approximately 4,000 of these households across the 3 wards meet at least one of the 4 criteria for deprivation. These are broken down as follows:

COURT: 1,323 RUXLEY 1,050 TOWN 1,624

We have also seen an increase in the life expectancy gap between the most, and least affluent wards in the borough, and this is now estimated as follows

For males there is a 10-year life expectancy gap between Auriol and Court ward

For females there an 8-year life expectancy gap between Stoneleigh and Court ward

The ward most adversely impacted by the wider determinants of health therefore remains Court Ward, followed by Town ward and it is here where the Council intends to intensify its reach in delivering against its priorities.

Those whose circumstance is evidenced as disproportionately impacting on health and wellbeing outcomes.

Finally, we recognise that health and wellbeing outcomes can also be disproportionately impacted by a person's circumstance, or life experience.

As the focus of our Strategy is to improve the mental and emotional wellbeing of residents, this section shall assume the position that we shall naturally seek to work with those experiencing mental health problems across a continuum, with a specific focus on working to reduce depression and anxiety and increase feelings of purpose and connection.

Whilst we shall aspire to ensure inclusivity, we shall also focus our attention on:

Carers of all ages	3.5% of residents aged over 5-years old provide 20-hours + every week. 81% of carers nationally have reported feelings of social isolation and loneliness. This rises to 89% in under 24-year-olds. In addition, a Carers UK survey reported 84% of carers report 'bad' or very bad mental health
Those who have survived domestic violence and abuse	In 2024, there were 638 incidents of domestic violence and abuse reported in the borough. Court ward recorded the highest incident rate. The Joint Strategic Needs Assessment (JSNA) reports that of referrals made to support services in 23/24, 59% reported a mental health support need.
Those with learning difficulties	There are 1,462 residents aged over the age of 18-years registered as having a learning difficulty. And 724 children with an Educational Health and Care Plan. The JSNA reports disproportionate rates of poor physical and mental health outcomes for people with learning difficulties

<p>Those with long-term health conditions and disability</p>	<p>24.7% of Surrey residents have high rates of long-term conditions with the most prevalent being diabetes, hypertension and cardiovascular disease. This rate is higher than England’s average (13.9%). Depression rates are likely to be 2-3 times higher with a chronic physical condition, increasing further for people living with more than one condition.</p> <p>In 2021, 4.8% of residents in Epsom and Ewell identified as being disabled and limited a lot, according to the 2021 Census. Additionally, 8.6% of the workforce at the Epsom and Ewell Borough Council stated they have a disability.</p>
<p>Those experiencing multiple disadvantage</p>	<p>This is a new area of development within the JSNA that recognises the impact of multiple disadvantage. This considers how experiencing 3 or more areas of disadvantage such as homelessness, addiction, bereavement, poverty, trauma etc. can significantly and negatively impact on our wellbeing. As people with multiple disadvantage are also the most likely to be impacted by the wider determinants of health, this area of work will allow the Council to adopt a Strategy that can target the most vulnerable.</p>

In addition to these groups, the Council will continue its work to improve the health and wellbeing of its refugee population, recognising the isolation and mental health impacts relocating to another country; especially where trauma and low levels of English are observed.

We shall also, in line with our responsibilities to our veterans, by progressing work to increase the visibility of services and support available.

Our commitment to partnership working in delivery of the Strategy:

Over the course of the last Strategy, and resultant from the pandemic and cost of living crisis, the Council has developed and maintained effective and purposeful relationships with both the health sector, and our community and voluntary sector partners.

In delivering this Strategy the Council will continue to fully engage our partners, recognising the value in collaboration. Of utmost importance is the Council’s intent to work with partners to further understand our communities, sharing local data and the continue creating a detailed picture of need as we move through the delivery of this Strategy. This will help shape projects, services and initiatives that are resultant from this Strategy, as well as help us secure outcomes, and measure our impact.

The Council shall also draw on the expertise and knowledge of Council departments, with particular focus on the delivery of the priorities through our housing teams, revenue and benefits, home improvement, community and wellbeing and community safety.

The Council shall also remain committed to reflecting on the views and experiences of residents of the borough through direct community engagement, and through the local insights our partners are able to provide.

APPENDIX 1: Our contribution in supporting the health and wellbeing of residents:

This summary is not exhaustive of the work of the Council

Supporting The Epsom Pantry with the Good Company, helping reduce food poverty and uncertainty.

The Community Boxing initiative to build confidence and self-esteem in young people: [Innovative boxing programme champions young people in Epsom & Ewell | Epsom and Ewell Borough Council](#)

Installation of ‘Happy to Chat’ benches in reducing social isolation

Community swimming project with GLL (Rainbow) and community referral partners: [Innovative new programme helps families experiencing barriers to sports participation | Epsom and Ewell Borough Council](#)

Delivery of the Surrey Youth Games.

Supporting ‘The Hub’ with Surrey Lifelong Learning Partnership: Improving access to employment, education and skill acquisition [About | Epsom and Ewell Hub](#)

Supporting ‘The Hub’ with Work Placement opportunities at the Council to improve employment potential.

Working with the Meeting Room, Citizens Advice Epsom and Ewell, and the Good Company to deliver the Household Support Fund: [Household Support Fund | Epsom and Ewell Borough Council](#)

Working with Epsom and Ewell Refugee Network to deliver an art projects, and coordination of refugee support programmes.

The development of the Councils Suicide Prevention Action Plan to support residents’ mental health and wellbeing.

Leading on Suicide Prevention Day – 10th September 2024 – raising awareness and reducing stigma. [Borough Insight - Epsom & Ewell Borough Council hosts walk and talk event on World Suicide Prevention Day](#)

Rollout of Suicide Awareness training to Council staff: Improving the Council’s response to disclosures of suicide.

Supporting young carers and their families with a free pass to Horton Golf club: [Horton Golf Park - Fun For the Whole Family](#)

Annual support of Community and Voluntary Sector each year - [Agenda](#)

APPENDIX 2: Data sources:

[Joint Strategic Needs Assessment | Surrey-i](#)

[How life has changed in Epsom and Ewell: Census 2021](#)

[Local indicators for Epsom and Ewell \(E07000208\) - ONS](#)

<https://www.surreyi.gov.uk/census-2021/census-2021-household-characteristics/>

[JSNA Mental Health Published | Tableau Public](#)

[Mapping loneliness during the coronavirus pandemic - Office for National Statistics](#)

[Fingertips | Department of Health and Social Care](#)

[Health & Wellbeing Strategy Index | Tableau Public](#)

<https://cdn-wp.datapress.cloud/surrey/20230922153308/CYP-EWMH-strategy.pdf>

<https://cdn-wp.datapress.cloud/surrey/20230922153308/CYP-EWMH-strategy.pdf>

[Census 2021: Household Characteristics | Surrey-i](#)

[Interactive map: Loneliness rates by local authority](#)

[Build a custom area profile - Census 2021, ONS](#)

[Life expectancy by census ward](#)

[Surrey - Incidents of Domestic Violence \(Ward\) | Surrey-i](#)

[State of Caring Survey 2023 - The impact of caring on: health | Carers UK](#)

[Emotional and Mental Wellbeing in Surrey Adults | Surrey-i](#)

<https://www.ons.gov.uk/visualisations/censusareachanges/E07000208/>

[Loneliness Guide | Marmalade Trust](#)

[Loneliness and mental health | Mental Health Foundation](#)

[495,904 patients with a dementia diagnosis in January 2025 – Polimapper](#)

<https://www.ons.gov.uk/visualisations/customprofiles/build/>



Equality Impact Assessment Template



Simple Guide and tips

An Equality Impact Assessment (EIA) will help you analyse your policies and practices to make sure they do not discriminate or disadvantage people. However, EIAs also will help to improve or promote equality, access, participation in public life and good relations.

Your EIA should be started during the early stages of your project. Early consideration of equality matters will ensure that your policy, service or function will evolve in line with consideration of equality matters. However, not everything we do will have equality implications, only policies and practices that are relevant to equality need to be put in focus. If you decide after an initial assessment that a policy or practice is not relevant to equality, then you should make a note of this. When completing a full EIA make certain the assessment is proportionate to the matters at hand. An EIA is not an end in itself – it is simply a way of ensuring and showing that due regard has been paid to our equality duty.

Where final decisions are made by councillors, in order to show that due regard has been given to the three aims of the equality duty at the time the decision is made, your assessment will need to be included within the report for Committee. The significance of your policy or practice to equality matters may help you make this decision.

All equality impact assessments are based around four core questions. There may well be others that contribute to the assessment, but the core ones remain throughout.

1. **What is the purpose of the policy?**
2. **How is it seeking to achieve this?**
3. **Who benefits and how? (and who, therefore, doesn't and why?)**
4. **What are any 'associated aims' attached to the policy?**



Stage 1 EIA tracking	
Title of EIA	Health and Wellbeing Strategy 2025-2028
Lead Officer	Rachel Epton
Division	Housing and Community – Community Development
Diversity, Equity & Inclusion Group - Review Date	18 th June 2025
Publication Date (if applicable)	1 st July 2025
EIA Review Date (if applicable)	Whilst the strategy is not subject to change once agreed at Community & Wellbeing Committee on 8 th July 2025, the EIA will be reviewed 12-months from the date of publication. This will be to ensure any impacts and decisions taken in respect of stage 5 and stage 6 are reviewed.



Stage 2 Details of service, policy or function to be assessed and the potential impact on people with a protected characteristic.

Provide an overview of the policy, service or other function being introduced or reviewed.

Please include the aim or purpose of the policy, service or function etc., any context, changes proposed and the desired outcome. You will need to start to think about the equality implications and whether there is potential for impact on residents, service users and staff (as applicable) with one or more of the protected characteristics.

The Council has drafted its new Health and Wellbeing Strategy 2025-2028 (HWBS)

The purpose of this strategy is to support the health and wellbeing of residents in the borough, with a focus on improving the mental and emotional wellbeing through:

- Increasing activity levels across the borough
- Creating opportunities for residents of the borough
- Supporting residents to build a connection with others

And whilst the Council will deliver a Strategy that serves all residents, our efforts will focus on:

- Children and young people (CYP)
- Older residents
- Those residents impacted by the wider determinants of health and,
- Those whose life circumstance may disproportionately impact on their health and wellbeing.

The strategy makes a commitment to working with those who may experience the worst health and wellbeing outcomes due to health inequalities; inequalities that are primarily attributed to circumstance and socio-economic factors. The HWBS is aimed at redressing this by bringing about opportunities for those who face such challenges and as such, is anticipated to not pose any negative impacts in regard to protected characteristics.



Stage 3 Relevant information, data, consultation and engagement activities

List all data (including source) and other information relevant to the full equality impact assessment

The HWBS has been underpinned by several data sources. All sources have provided insights as to the level of need in the borough and steer the Council's strategic priorities. Data sources have included:

Surrey's Joint Strategic Needs Assessment:

[Joint Strategic Needs Assessment | Surrey-i](#)

Office of National Statistics:

<https://www.ons.gov.uk>

Public Health Fingertips:

[Fingertips | Department of Health and Social Care](#)

Surrey-i:

<https://www.surreyi.gov.uk>

Polimapper:

<https://polimapper.co.uk>

The author of the strategy has further considered *Surrey's Children and Young People's Emotional Wellbeing and Mental Health Strategy 2022-2027*, and reports produced by Carers UK, the Mental Health Foundation and the Marmalade Trust.

Local data sources have also been gathered and relied upon. In particular a piece of work undertaken by Surrey Downs Health and Care Partnership that has helped the Council identify areas of loneliness in the borough, and correlate this with the prevalence of mental health. Data from the Digital Inclusion Network has also been considered.

Specify all engagement activities undertaken

Committee:

The (draft) Health and Wellbeing Strategy has been presented to the Community and Wellbeing Committee on two occasions; January 2025 and March 2025. It has received the support of the committee on both occasions.

Professional consultation:

The views of Community and Voluntary Sector (CVS) have been taken into consideration in the development of the strategy. Views have been gathered via the CVS during a forum held on December 2024, and through a Neighbourhood Board Partnership Forum (NHBPF) held in January 2025. During this meeting the key themes of



the strategy were presented to CVS partners and Primary Care Network representatives with the views of those in attendance reflected in the strategy. In addition to this, the Council also chairs the Neighbourhood Board, a board that brings together Primary Care Networks and community partners. This Board has helped shape the strategy through direct insights and data, ensuring we work to priorities that will have the greatest impacts.

Public Consultation:

The HWBS was taken to Public Consultation. This commenced on Friday 4th April and closed on Friday 16th May 2025 (6-weeks) and asked residents to what extent they agreed or disagreed with each priority area. There was also the opportunity for residents to comment freely where they felt they'd like to see additions to the strategy.

The Public Consultation was made available on-line and promoted via social media channels. As to ensure there was an opportunity for those who are digitally excluded to complete the questionnaire, the questionnaire was promoted and available in hard copy at the following venues:

- Epsom Town Hall
- Epsom Methodist Church
- Rainbow Leisure Centre
- The Wells Community Centre
- The Community and Wellbeing Centre
- Bourne Hall

The Community Development Manager also held drop-ins at each of the above venues. These commenced on 11th April and ended on 1st May. An evening session was held on 24th April at Rainbow Leisure Centre between 5-7pm.

In addition to this, the Public Consultation was also sent directly to CVS partners, inclusive of Good Company Sunnybank Trust, Age Concern, We Power On, Citizens Advice, Central Surrey Voluntary Action, Surrey Lifelong Learning, Step Forward, Mary Francis Trust, Love me Love my Mind, Buddy Up, My Time for Young Carers, and North Surrey Domestic Abuse Service. It was also circulated to the borough's faith groups, veterans lead, family centres, Town and Country Housing, Schools, and Active Surrey.

The Council also reached out to Nescot's and University of Creative Arts (UCA), offering to hold focus groups. Unfortunately, this did not come to fruition.

**Results of the Consultation:**

Please note, that whilst the total number of respondents, was 114, the percentages provided below are based on the number of respondents are answered each question.

Closed questions:

- 1) 92% of respondents agreed or strongly agreed with mental and emotional health being the overall aim of the strategy
- 2) 92% of respondents agreed or strongly agreed with improving access to physical activity
- 3) 91% of respondents agreed or strongly agreed with creating opportunity in the borough
- 4) 86% of respondents agreed or strongly agreed with supporting resident to build a connection
- 5) 71% of respondents agreed or strongly agreed with focusing on children and young people
- 6) 76% of respondents agreed or strongly agreed with focusing on those impact by socio-economic factors
- 7) 65% of respondents agreed or strongly agreed with the groups impact by circumstance
- 8) 76% of respondents agreed or strongly agreed that digital exclusion can have an impact of health inequality
- 9) 56% of respondents knew someone who would benefit from improving their digital skills
- 10) 65% of respondents felt that there were other groups that could be targeted in the strategy.

Open questions:

- 11) 66 people (57%) provided an answer in respect of what other groups should be considered - older residents, those with disability and the isolated featured the most heavily amongst respondents.
- 12) 24 people (21%) provided an answer when asked why they had either disagreed or strongly disagreed with any of the questions. This is a low response rate, however there was a general theme relating to serving older residents and those with disability.
- 13) 59 people (52%) provided an answer in respect of what they would add to the strategy. The strongest themes were that of consideration to the needs of older, isolated and disabled residents. The creation opportunity through access – to venues, employment, volunteering and activities – also featured.



Demographics: For those who provided their information in regard to equality monitoring:

50% were over 61-years old
21% were aged between 51-60-years old
20% were aged between 41-50-years old
9% were aged between 31-40-years old

76% were female
19% were male
4% preferred not to identify gender
0.5% were non-binary
0.5% reported to be other.

90% of respondents were White (English, Welsh, Scottish, Northern Irish, British, Irish, Gypsy or Irish traveller, Rome or other white background)
6% of respondents were Asian or British Asian (Indian, Pakistani, Bangladeshi, Chinese, or any other Asian background)
2% of respondents were Black, Black British, Caribbean or African
1% of respondents were mixed or multiple ethnic groups (White and Black Caribbean) (White and Black African) (White and Asian) (Any other mixed or multiple ethnic background)
1% of respondents reported as another ethnic group (Arab, any other ethnic group)

23% of respondents considered themselves to have a disability

1% of respondents reported being a veteran or currently serving in the armed forces.



Stage 4 Impact on residents, service users and staff with protected characteristics

Undertake a full analysis which details all positive and negative impact arising from the policy, service or other function. If there will be no impact, make this clear by completing the relevant box. Please ensure that you evidence your conclusions with reference to the appropriate source.

Protected Characteristic	Potential Positive Impact	Potential Negative Impact	No Impact
Age	<p>The strategy makes a commitment of benefiting residents of all ages and in targeting those impacted by the wider determinants of health and by circumstance; this will span the life cycle. The strategy does however make reference to children and young, and as a result of the people consultation, now explicitly refers to older persons (please refer to stage 5). As such, the strategy will benefit those of non-working age to engage in activity, create opportunity and support meaningful connections.</p> <p>Whilst we cannot exhaust examples here, whereby we improve the digital skills of those over 65-years of age, or support children and young people facing multiple disadvantage to develop a skill, the strategy has the potential for positive impact.</p>		
Disability	<p>The strategy refers to targeting those impacted by circumstance, and therefore those whose health and wellbeing may be adversely affected. This includes those with learning disabilities and with long-term health conditions. Following the public</p>		



	<p>consultation the Council has now explicitly included those with physical disabilities.</p> <p>Whilst we cannot exhaust examples here, whereby we can improve access to activity, opportunity and connection, the strategy has the potential for positive impact.</p>		
Gender Reassignment		<p>The UK Supreme Court has recently ruled that the definition of sex as stated in the Equality Act 2010 should be interpreted as 'biological' sex only. This means that a person's legal sex is the one that was recorded at their birth.</p> <p>There is currently a public consultation as to the codes of practice that should be implemented as a result of this ruling.</p> <p>There is a potential negative impact on the transgender community in the borough, in respect of the projects that are to be delivered against this strategy. An example of such may be in the delivery of women/men only groups</p>	<p>The strategy would not be seen to have a positive or negative impact on those who have been through gender reassignment. The strategic priorities and areas of focus do not discriminate against this protected characteristic</p>
Pregnancy and Maternity	<p>Whilst not named or targeted as a group, the strategy refers to creating opportunity and building connections for residents in the borough. For new parents and those returning to work the strategy has the potential for positive impact</p>		
Race			<p>The strategy would not be seen to have a positive or negative impact based on the race of a resident. The strategic priorities and areas of focus do not discriminate</p>



			against this protected characteristic
<i>Religion and Belief</i>			The strategy would not be seen to have a positive or negative impact on those who have a religion or belief. The strategic priorities and areas of focus do not discriminate against this protected characteristic
<i>Sex</i>			The strategy would not be seen to have a positive or negative impact on residents based on their sex. The strategic priorities and areas of focus do not discriminate against this protected characteristic
<i>Sexual Orientation</i>			The strategy would not be seen to have a positive or negative impact on based on the sexual orientation of an individual. The strategic priorities and areas of focus do not discriminate against this protected characteristic
<i>Marriage and Civil Partnerships</i>			The strategy would not be seen to have a positive or negative impact on those who



			are married or who have entered a civil partnership. The strategic priorities and areas of focus do not discriminate against this protected characteristic
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Stage 5 Decision

Specify the full details of your decision.

Include any changes made to the proposal, steps taken to eliminate or minimise any negative impact(s), any additional mechanisms put in place to meet the needs of particular groups or to help foster good relations etc.

The consultation results evidence a high level of agreement and public support towards the overall Health and Wellbeing Strategy.

- In respect of the Strategy's priorities (Q1-4), on average, 90% of respondents *agreed or strongly agreed* with those identified
- In respect of the Strategy's areas of focus (Q5-7) on average, 70% of respondents *agreed or strongly agreed* with those identified.

The Council takes the views of its residents and the partners they work alongside seriously and wishes to evidence and reflect on the following:

In respect of responses to Q7 and Q10, that evidenced the lowest levels of agreement:

- 7. 65% of respondents agreed or strongly agreed with the groups impact by circumstance
- 10. 65% of respondents felt that there were other groups that could be targeted in the strategy.

These indicate the need for the Council to re-consider elements of the Strategy. The Council also reviewed the feedback regarding the other groups being highlighted by respondents as being older residents, those with physical disabilities, and those who are isolated.

The Council up-holds the position that issues relating to isolation will be addressed in its strategic intention to support residents to build connections and as such no changes in this regard are required.



	<p>In respect of those with disabilities, the strategy reflects its intention to focus on those residents with a learning disability. The Council has however responded in being more explicit and incorporating those with disabilities into long-term health conditions.</p> <p>The Council has responded to the feedback in respect of the inclusion of older residents by the addition of older residents in the strategy. The Council accepts that by doing so we will also further bolster our commitment to addressing those impacted by isolation, disability and digital exclusion.</p> <p>In addition to this, during the drop-in held at the Community and Wellbeing Centre, the Council received the feedback that the use of acronyms may discriminate against some residents, and as such a glossary has also been included.</p> <p>In respect of the UK Supreme Court ruling on the legal definition of sex within the Equality Act 2010, the Council will need to review its own practices in relation to this post the results of the public consultation.</p>
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Stage 6 EIA – Action Plan

Please specify any action that will be taken to support implementation of your decision

Issue Identified	Action required	Implementation Date	Responsible Officer
As reflected and evidenced in Stage 5	To consider and include in strategy people with physical disabilities and older residents.	28 th May 2025	Rachel Epton.
Impact of the UK Supreme ruling on the legal definition of sex with the strategy.	To review the EIA post of the results if the public consultation and consider the codes of practice implemented.	1st July 2026	Rachel Epton

Stage 7 EIA Sign Off



EIA needs to be signed off by Head of Service.

If an EIA is going to be submitted with a proposal to a committee/corporate project board for decision making, the EIA needs to be approved by Head of Service and Strategic Management Team first.

Head of Service: Rod Brown

Date: 30.06.2025

Strategic Management Team: Reviewed by Chief Executive

Date: 28.06.2025

Name of Committee: Community and Wellbeing Committee – being held 8th July 2025

Date:

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AFGHAN REFUGEES

Head of Service:	Rod Brown, Head of Housing & Community
Report Author	Rod Brown, Rachel Epton, Arjan de Jong
Wards affected:	(All Wards);
Urgent Decision?(yes/no)	No
If yes, reason urgent decision required:	N/A
Appendices (attached):	Appendix 1 Impact Assessment Appendix 2 Transitional Accommodation specification Appendix 3 HMG letter 19 th March 2025 Appendix 4 ARP Funding summary Appendix 5 ARP FAQ

Summary

The report sets out the Afghan Resettlement Programme (ARP) and proposes the Council's offer of accommodating eligible Afghan households and the provision of Transitional Accommodation.

Recommendation (s)

The Committee is asked to:

- (1) Nominate and Authorise the Head of Housing and Community, in consultation with the Committee Chair, to produce and submit a response to the Government on behalf of the Council, as outlined in section 5 of this report**

1 Reason for Recommendation

- 1.1 By agreeing to accommodate two families under the ARP, the Council is contributing to the national resettlement of eligible Afghan households settled in the UK

2 Background

- 2.1 The Afghan Resettlement Programme (ARP) brings together existing Afghan resettlement schemes into a single, efficient scheme. The Government intends that a single resettlement scheme will improve efficiency, value for money and outcomes across Afghan Resettlement. The Government intends to reach an eventual ending of UK Afghan resettlement schemes.
- 2.2 Existing schemes brought under the ARP include:
 - The Afghan Relocations and Assistance Policy (ARAP). This is for Afghan citizens who worked for or with the UK Government in Afghanistan in exposed or meaningful roles and may include an offer of relocation to the UK for those deemed eligible by the Ministry of Defence and who are deemed suitable for relocation by the Home Office.
 - The Afghan Citizens Resettlement Scheme (ACRS). This is a referral-based resettlement scheme which prioritises vulnerable people and those who assisted UK efforts in Afghanistan.

3 Previous Council support for Afghan resettlement

- 3.1 At the 30th September 2021 Community and Wellbeing Committee meeting the decision was to support up to 5 Afghan families referred from the ARAP programme.
- 3.2 At the 17th March 2022 Community and Wellbeing Committee meeting the decision was to extend the original offer under ARAP to include those also eligible under ACRS.
- 3.3 Since these decisions were made the Council has, with support from Epsom and Ewell Refugee Network (EERN), fulfilled its commitment in full under both the ARAP and ACRS.
- 3.4 The Council has developed good working relationship with EERN and has benefited significantly from the resources and expertise they are able to offer. EERN is a specialist refugee charity operating as part of the locally based charity The Good Company.
- 3.5 Properties being used for Afghan resettlement have been acquired through the EERN, avoiding conflict with the substantial number of residents seeking affordable accommodation.
- 3.6 The Council is also committed to resettling one Afghan family through participating in the Local Authority Housing Fund 3 programme (LAHF3). This programme also includes government part funding the purchase of an additional 5 properties for the Council's use as additional temporary accommodation for local Epsom borough residents.
- 3.7 In addition to support for Afghan refugees, the Council has previously supported refugees from Syria and continues to support those fleeing conflict in Ukraine.

4 Request from central Government

- 4.1 The current Government has indicated it wishes to engage with local authorities and to move away from a centre led approach to asylum dispersion and refugee resettlement.
- 4.2 Following the recent conflict in Afghanistan the UK Government, working with local councils, has resettled over 30,000 Afghans. Many eligible Afghan refugees are still not yet resettled, instead continue to live in either Afghanistan or in other displaced areas. It is anticipated an additional 1000 new arrivals will be admitted to the UK this spring.
- 4.3 From 1 March 2025, transitional accommodation will be provided for all Afghans on the ARP for a maximum of 9 months. Following this period ARP families will be expected to move to the Private Rented Sector (PRS) directly or via council provided accommodation, with councils funded to facilitate case working support.
- 4.4 The UK Government works with local councils through Strategic Migration Partnerships (SMP) which serves to co-ordinate regional responses to migration issues. Surrey and Sussex are included in the South East SMP, which co-ordinates and gathers data from councils in the South East of England.
- 4.5 UK Government have identified the allocation of ARP families across the UK regions, based on population share up to March 2026. The UK total is 6,720 Afghan people. Of these 5509 are allocated unmatched Afghans for England, the South East as a whole has been allocated 496 unmatched Afghans with London allocated 1095. (See Appendix 2)
- 4.6 On 19th March 2025, the UK Government wrote to all councils asking for Councils to:
 - Consider capacity to stand up transitional accommodation for Afghan refugees, and
 - Consider provision of housing and integration support to households leaving transitional hotels.
- 4.7 A copy of this UK Government correspondence is attached as Appendix 3.
- 4.8 So as to facilitate a general high level indication, the South East SMP asked councils to provide initial high-level responses to the questions raised in the 19th March 2025 letter by 3rd April 2025. This tight timetable meant that without Committee approval, only an indicative officer response was possible.

5 Proposal

- 5.1 This report provides an opportunity to confirm the Council's response to the questions raised.

Transitional Accommodation

- 5.2 The UK Government have specified the minimum requirements for Transitional Accommodation (See Appendix 2). This specified Transitional Accommodation offered must be larger hotels with bed space capacity of at least 100 with on-site catering facilities, or serviced accommodation in hubs of at least 5.
- 5.3 There are no large hotels with on-site catering facilities within the borough. With the high demand for accommodation of all sizes for use as homeless accommodation, we are not aware of 5 properties which can operate as a hub of 5 units.
- 5.4 Consequently the proposed response from the Council is that we are not able to assist with the provision of Transitional Accommodation, as specified.

Provision of housing

- 5.5 The South East SMP have indicated that if the allocation of 496 Afghans for the South East region was simplistically split across all the councils in the region, then this would equate to each council taking 8 people.
- 5.6 Clearly some councils are better placed to take more than 8 Afghans and other areas, particularly those experiencing the highest homelessness pressures, would be unable to accommodate 8 people.
- 5.7 Given that this Council continues to experience some of the highest levels of homelessness in the region and has an extreme shortage of affordable housing, it is proposed that the commitment to accommodating Afghan households, through the ARP is limited to two households with a maximum of four people.

6 Risk Assessment

Legal or other duties

- 6.1 Impact Assessment
- 6.2 An Impact assessment was presented in the report taken to Full Council on 30th September 2022. These considerations are upheld for the purposes of this report as families under ARP are subject to same eligibility in respect of housing, securing indefinite leave to remain, the Government funding instruction and tariff, and subsequent support package.
- 6.3 Consideration would need to be given to families under ARP and any impact in respect of having more complex needs and more support in integration. This issue may be mitigated by EERN who, having supported the Council in hosting refugee families, are experienced in addressing the complex needs of refugee families.

6.4 Crime & Disorder

6.4.1 The emphasis on the funded resettlement of Afghan refugees through an identified Government scheme ensures the best opportunities for successful integration and a positive future contribution to the UK.

6.4.2 The Council will work closely with the police in identifying suitable property and would ensure risks to the refugee family were identified and minimised and any community concerns addressed promptly

6.5 Safeguarding

6.5.1 Any refugee household accommodated through the ARP scheme would benefit from close integration support. This would include safeguarding considerations with a duty to report safeguarding concerns in line with statutory requirements

6.6 Dependencies

6.6.1 The availability of suitable properties for ARP families is likely to be a significant dependency of fulfilling the commitment to accommodate families.

6.6.2 Working closely with the EERN, including in identifying suitable properties, is reliant on maintaining good working relationships and their ability to identify properties.

7 Financial Implications

7.1 Funding instructions with further detailed information are yet to be made available. However, in the 19th March 2025 letter (see Appendix 3), the UK Government have specified the following and summarised the funding provision (See Appendix 4)

7.2 Under the ARP the funding arrangements are moving towards a single integration tariff of £24,110 per person, spread out over three years.

7.3 In the first year a lump sum of £5,400 per person can be claimed following the individual's arrival into transitional accommodation. Two further payments of £3,600 and £3,410 will be available in months 4 and 10 respectively to help cover costs associated with housing and integration support during the first year.

7.4 Further tariff payments of £6,550 and £5,150 will be available in years two and three respectively.

7.5 In addition to this integration tariff, councils can claim up to £5,130 per child aged 5-18 and £2,965 per child aged 3-4 to help meet costs of education in year one. A further payment of £2,600 per person will be made to Integrated Care Boards in year one to support healthcare upon arrival.

7.6 **Section 151 Officer's comments:** The financial implications are included within the body of the report.

8 Legal Implications

8.1 There is no legal obligation on the Council to participate in the Government's ARP. Should the Council agree to participate in the ARP to be eligible for the funding the Council will be required to abide by the Government's requirements for the scheme.

8.2 **Legal Officer's comments:** None for the purposes of this report

9 Policies, Plans & Partnerships

9.1 **Council's Key Priorities:** The following Key Priorities are engaged:

- Safe and well

9.2 **Service Plans:** The matter is not included within the current Service Delivery Plan.

9.3 **Climate & Environmental Impact of recommendations:** None

9.4 **Sustainability Policy & Community Safety Implications:** Successful integration of refugee families is identified as being a significant factor in ensuring community safety issues are minimised. The ARP scheme is funded over three years offering reasonable assurance that accommodated families will integrate successfully.

9.5 **Partnerships:** The Council is working effectively with Surrey County Council, Surrey Police, NHS organisations, neighbouring Councils, and various voluntary groups, in particular Epsom and Ewell Refugee Network in providing support to Afghan refugees.

9.6 **Local Government Reorganisation Implications:** There are no significant implications to the recommendation of this report from Local Government Reorganisation.

10 Background papers

10.1 The documents referred to in compiling this report are as follows:

Previous reports:

- Afghan Citizens Resettlement Scheme Community and Wellbeing Committee 17th March 2022
- Afghan Locally Employed Staff Council 30th September 2021

Other papers:

-

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Impact Assessment extract from Afghan Locally Employed Staff Council 30th September 2021

8.2.1 The impact on existing local communities and infrastructure, such as schools, medical and dental practices from the recommendation contained in this report has been considered.

8.2.2 As the composition and identities of any refugee families accepted is unknown it is difficult to predict the eventual impact of participating in the LES scheme.

8.2.3 Although there is inevitably some uncertainty, the process by which the Council works with the SEMSP to match a refugee family closely to the accommodation and local facilities available will minimise such a risk.

8.2.4 The impact of the recommendation on the borough's existing homelessness requirement will be mitigated by restricting properties involved in the LES scheme to those not available for use to offer to other homelessness households.

8.2.5 Under the LES scheme the typical level of proficiency in speaking English Language, even if only one family member, will mitigate the risks of long term unemployment.

8.2.6 Should the household fail to integrate and become self-sufficient after year 3, there is a risk that they will continue to need council support without any additional government funding. This could include being eligible for assistance under the Homelessness Reduction Act including the use of temporary accommodation.

8.2.7 Should households with indefinite leave to remain present to the Council outside the LES scheme the Council would need to assess and meet any statutory duties that may be owed to the household under Homelessness Reduction Act. Page 10 Agenda Item 3 Council 30 September 2021

8.2.8 As a result of recent changes made to the Habitual Residence Test (HRT) these households are able to approach council's directly from 16 September 2021 onwards.

8.2.9 A decision not to participate in the Afghan LES resettlement scheme might be open to criticism from the public, other participating councils and the Home Office and MHCLG. In contrast a decision to participate in any refugee settlement may generate some criticism although this is likely to be less than that from not participating.

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Regional/national coordination of arrivals under the Afghan Resettlement Programme (ARP)

Overview

UK Government (UKG) has provided **every region/nation** with an initial allocation of Afghan arrivals that they will be expected to **accommodate in transitional accommodation**. The allocation is for arrivals up to March 2026, based on anticipated inflows under the ARP. The regional/national allocations are set out at the end of this document for reference.

We want to give local and devolved governments maximum choice about where and how people are accommodated in their region/nation. Therefore, all SMPs, including those hosted by COSLA, WLGA and the Northern Ireland Executive, are now being asked to facilitate conversations with councils in their area to agree how their allocation should be split across their region/nation.

Note that both UKG procured, and council led transitional accommodation contributes towards accommodating the overall regional/national allocation. It is also the case that transitional accommodation is likely to be 'recycled' as arrivals flow through into settled accommodation.

In completing this template SMPs are asked to include information on:

- Which councils in their region/nation can accommodate arrivals in transitional accommodation, and how many arrivals each council can take (up to March 2026).
- Whether they recommend any specific hotel(s) for UKG to contract in their area (noting that accommodation to be procured by UKG will need to meet the Statement of Requirements, which has been shared with SMPs and attached at Annex B).
- Whether councils in their region/nation might be willing to deliver transitional accommodation themselves, to inform possible participation in a UKG run pilot.

SMPs should then complete and submit this pro forma (one submission per region/nation) setting out how their region/nation will meet their overall allocation and return to SJCUK-LAZURITE-JTAGDUTYOFF@mod.gov.uk by **4 April**. Any early returns will be very gratefully received.

Please note that while the regional/national allocation is for arrivals into transitional accommodation (where they can then stay for up to 9 months), it is expected that arrivals will also be supported into settled accommodation within the same region/nation as far as is possible. While this pro-forma is requesting details of councils who can support with the provision of transitional accommodation as the immediate ask, all councils within the region are expected to play their part in supporting the longer-term accommodation and support needs of this cohort.

Please also be aware that while the initial regional/national allocation is for arrivals up to March 2026 (i.e. the next 12 months), we expect there to be an ongoing need for transitional accommodation for the ARP cohort beyond this date. Updated regional/national allocations will be provided for future years, and a further ask for SMPs to coordinate responses to these - UKG will provide details on the process for future years in due course.

Section 1: Headline information

Name of region/nation: [insert name of region/nation]

Allocation for your region/nation: [this can be taken from Annex A]

SMP lead - contact details: [insert email address]

Section 2: Councils that can support with UK Government-procured transitional accommodation

Please complete this section with details of which councils within your region/nation can accommodate Afghan arrivals in transitional accommodation and provide an indication of how many arrivals they can each take up to March 2026.

The total of all councils' allocations listed below should **equal** the overall total for your region/nation as set out in Section 1.

Best endeavours will be made by UKG to procure accommodation in the areas listed below, in line with their stated capacity to support. However, this will depend on identifying suitable property that meets our **Statement of Requirement for transitional accommodation at the end of this document**. Please therefore consider this during completion of this form.

If suitable accommodation has already been identified by a council, please provide details below. If putting forward a specific hotel/serviced apartment block, please also confirm that the owners have been consulted and are supportive. If suitable accommodation has not yet been identified, UKG will explore options in discussion with the council.

To note, the average household size of arrivals is 5.5. UKG will look to ensure each region/nation receives a representative mix of household sizes. We will endeavour to stagger arrivals into your region/nation and will discuss this further with councils and SMPs following receipt of this pro-forma.

Council	Allocation	Able to start receiving arrivals now? (Y/N) - if no, please indicate when	If you would like to recommend that UKG approaches a specific hotel/serviced apartment block, please indicate details below including any information you hold on how quickly accommodation can be stood up. Please note accommodation must be in line with UKG's Statement of Requirements.	Council contact details for UKG to arrange further conversation
e.g. Alphacrest	150	Y	Y – The Strand Hotel. LA has consulted owner, and they are supportive. Can be stood up quickly (c 2 weeks).	XXX

Section 3: Interest in a council-led transitional pilot

As above, the default position will be UKG procured transitional accommodation to fulfil a region/nation's allocation, likely in the form of hotel accommodation or serviced apartments.

However, longer term we want to move to a system whereby councils deliver a greater proportion of transitional accommodation themselves. This would give local government more control to deliver accommodation and support in a way that manages local pressures, mitigates cohesion risks and delivers better outcomes. We want to pilot this approach in a few areas initially, with the view to scale up at a later stage pending review.

Please use the free textbox below to indicate if any councils in your region/nation would be interested in delivering any or all of their agreed allocation for transitional accommodation (as set out in the table above) themselves. Please include detail on:

- how many arrivals they think they could accommodate and over what timeframe;

- If suitable accommodation has already been identified that the council could procure or utilise to stand up transitional themselves.

This will help inform possible participation in a limited number of pilots to test council-led transitional. Please note that expressing an interest does not bind a council to participating, nor does it guarantee they will definitely be involved in the pilot. UKG officials will follow up with relevant council's post receipt of this pro forma, for further discussion.

[add detail, including contact details for the interested councils for follow up conversations]

Regional/national allocations

The below allocations are the number of individual Afghan arrivals we expect each region to take, up to March 2026. They allocate a total of 560 arrivals a month (6720 in a year), based on anticipated inflows under the ARP. The regional/national allocations are based on a population share approach but also account for unmatched Afghans in transitional accommodation (as on 05 March 2025). These are indicative as we do not have completely definitive arrivals numbers. We would be grateful for offers from regions to go above their regional/national allocation if they feel able to.

Region/nation	Population share accounting for all unmatched Afghans in transitional accommodation (as on 05-March)
SOUTH EAST	496
LONDON	1095
NORTH WEST	890
EAST OF ENGLAND	791
WEST MIDLANDS	575
SOUTH WEST	324
YORKSHIRE AND THE HUMBER	616
EAST MIDLANDS	390
NORTH EAST	332
ENGLAND	5509
WALES	316
SCOTLAND	660
NORTHERN IRELAND	235
UK TOTAL	6720

UKG's Statement of Requirements for ARP Transitional Accommodation

This Statement of Requirements outlines what UKG considers when identifying suitable transitional accommodation (TrA) to support the Afghan Resettlement Programme (ARP). These requirements are necessary to ensure operational viability, maximise opportunity for successful long-term integration, and for the safety and comfort of guests who will be predominately families. Primarily we expect that TrA will be hotels or serviced accommodation, but if it meets our criteria, we will consider other accommodation options. Further detail on each requirement can be provided. This approach is consistent with that taken for other TrA procured and operated by UKG.

Requirements

Capacity: To ensure value for money and suitable resource allocation, larger hotels with bedspace capacity of at least 100, or Serviced Accommodation in hubs of at least 5, are the minimum capacity requirements.

Location: The location of the TrA and its proximity to local amenities is key to enabling successful integration and a degree of independence. The preference is for large towns, close to shops, transport, public services, amenities, and places of worship. TrA should not be on motorway junctions or large A-roads unless bus stops are located directly outside. Ideally the TrA would be close to green space, within hotel grounds or a short walk away, to allow children a safe place to play (desirable but not essential).

TrA suitability: The TrA must have suitable facilities to ensure a comfortable, safe stay. As a general indicator, that would mean a minimum of 3-star accommodation. Rooms must be suitably sized to accommodate families, or configurable to enable extra beds/cots as required; all rooms are to be ensuite. In hotels, a suitably sized dining area and on-site catering facilities that can provide 3 halal meals is essential. We would expect a large communal space and a few small private meeting rooms to be included to facilitate activities like townhalls and conversations with UKG support staff on site. The TrA must be suitable for habitation throughout all seasons and weather conditions.

Security: A separate on-site security provision will be put in place by UKG as part of the commercial contract. This service will complement the contracted venue's service provision. Full time reception services must be provided to complement the UKG contracted security services.

Resettlement and integration consideration: When considering suitable locations, UKG considers 4 key factors within resettlement planning. These are: existing social pressures; local housing market availability and demands; current population, including asylum dispersal; and location viability. UKG will endeavour to place TrA in areas identified as most suitable within Regional/national plans and against any TrA offered by the Local Authority (LA).

Community cohesion considerations: When considering suitable TrA locations, UKG will take community cohesion into account.

Commercial: All accommodation and catering provision must meet value for money scrutiny. If TrA is proposed by a LA, it must be willing to be contracted for this purpose and for a minimum of 9 months.

Next steps

Once a suitable TrA site has been identified by a LA, UKG teams will work with the LA and TrA management team to ensure suitability and viability. Assuming this, UKG will then look to contract the TrA and stand it up with close engagement with the LA.

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HM Government

2 Marsham Street
London
SW1P 4DF

19 March 2025

Dear Leader, Chief Executives and SMPs,

It was a pleasure to speak with you at the local authority webinar we hosted on 5 February in which we set out our plans for the Afghan Resettlement Programme (ARP), which went live on 1 March.

In a follow up letter of 25 February, we provided further detail on the key components of this programme which is a cross-government priority as we deliver on the pledge to those in Afghanistan who are eligible to relocate and resettle in the UK.

It is testament to the support of local government that we have been able to resettle over 30,000 Afghans since August 2021, but there is much more work to do, and we urgently need further support from the sector given your experience and expertise.

Following a discussion at an [Asylum and Resettlement Ministerial and Local Government Forum](#) on 18 March and discussions in devolved administrations, we are now writing to set out the regional/national approach we are taking to the ARP and the asks being made of local authorities to support this.

Attached to this letter is a document which summarises our discussion on 18 March and explains our ask of local government. **Specifically, we are asking SMPs, and the relevant bodies in Scotland, Wales and Northern Ireland to complete the regional/national response template provided with this letter by 4 April and to return this to SJCUK-LAZURITE-JTAGDUTYOFF@mod.gov.uk. Any early returns will be very gratefully received. The statement of requirements provided should be used to inform these responses.**

The completed regional/national response should set out in the broadest terms how each region/nation will meet their initial regional/national allocation of Afghan arrivals up to March 2026. We will then keep these allocations under review and work with local government on these allocations going forwards.

Given the need to find additional bedspaces for 1,000 new arrivals coming to the UK in the spring, we would be grateful if the responses could include information on where you can support UK Government (UKG) procured transitional accommodation in your region/nation and an indication of your current or future willingness to provide council led transitional accommodation on a voluntary basis (with funding to do so). Further information is below and any contribution you make now will count towards your regional/national allocations.

Unfortunately, if local authorities do not voluntarily come forward to support UKG procured transitional accommodation, we will need to move ahead and procure that accommodation in any event, in line with regional/national allocations, and in that scenario would still encourage the relevant council to draw down on the integration tariff.

The Home Office will also shortly be writing out to local authorities to ask them to consider expressing interest in participating in pilots for a new model of asylum accommodation. While these are distinct asks and distinct cohorts, both of these approaches reflect our overall ambition to give local areas more control in the accommodation and support for new arrivals in their area.

These asks of councils will be underpinned by the core components of the ARP including:

Providing a maximum of nine-months in transitional accommodation: From 1 March 2025, transitional accommodation will be provided for all Afghans on the ARP for a maximum of nine months. Afghan arrivals already in transitional accommodation in the UK, will be moved on to the ARP and receive a maximum of nine months support in transitional accommodation, effective 1 March 2025.

Supporting access to the private rented sector and providing a pipeline of settled accommodation: The primary source of settled accommodation for arrivals should be in the private rented sector. We will encourage everybody to look for their own accommodation for the longer-term, with advice and casework support from councils as appropriate. Guidance on the Find Your Own Accommodation (FYO) pathway has been provided to councils. Funding for case working support from councils is included in the tariff. However, we will also fund a pipeline of settled housing for around half of the arrivals, for whom the private rented sector is less appropriate. This will be sourced from a combination of community sponsorship through the Communities for Afghans scheme, some service family accommodation and capital funding for additional supply from the Local Authority Housing Fund (LAHF) and its successor, which we will say more about after the Spending Review. We are keen to work with you to build on learning from previous schemes on how best to support this group find permanent homes.

A single streamlined tariff of £24,110 over three years: We are moving to a single integration tariff amounting to £24,110 over three years. In the first year this will be split. The first of these payments will be a £5,400 lump sum, which local authorities can claim following an individual's arrival into transitional accommodation in their area recognising the up-front cost to councils.

Two further payments of £3,600 and £3,410 will be available in months 4 and 10 respectively, to help meet the ongoing costs of housing and integration support during an arrival's first year. These will be paid to either the transitional local authority or the settled, depending on who is providing support at the time the claim is made.

Further tariff payments of £6,550 and £5,150 will be available in years two and three respectively.

In addition to the integration tariff, local authorities will be able to claim up to £5,130 per child aged 5-18 and £2,965 per child aged 3-4 to help meet the costs of education in year one. This education tariff will be split into three proportional payments aligned with the three year-one integration tariff payments. A single, one-off payment of £2,600 per person will also be available to Integrated Care Boards and Health Boards in year one to support healthcare on arrival. Funding instructions with further detail will follow.

Resetting expectations and providing integration support before arrival: We are enhancing integration support for Afghans pre-arrival, focusing on a range of proactive activities for which we have just contracted the International Organisation for Migration (IOM) to provide for us overseas. The work carried out by the IOM will help set expectations about life in the UK and include information in essential areas like navigating the UK rental sector, enhancing employability, and understanding UK society and attitudes. The Government/IOM is also addressing crucial concerns relating to issues of domestic abuse and violence against women and girls.

We would like to end this letter by saying thank you for all of your and your teams' work on this programme so far. This work, alongside work to support the resettlement of other cohorts represents the very best of local government, and we look forward to further joint working and collaboration as the ARP develops.

We are copying this letter to our colleagues in the devolved governments.

The image shows two handwritten signatures in black ink. The signature on the left is 'Luke' and the signature on the right is 'W. Khan'.

Lord Khan of Burnley
Lords Minister for Faith, Communities and Resettlement

Luke Pollard MP
Minister for the Armed Forces

SUMMARY ASK OF LOCAL AUTHORITIES ON ARP IMPLEMENTATION

1. Regional/national Allocations

We committed to moving towards a model where every region/nation receives an allocation of Afghan arrivals (under the ARP) into transitional accommodation.

Annexed to the regional returns template is every region/nation's initial allocation, for arrivals over the next 12-months (up to March 2026).

Our ask: Given the urgency of the need to accommodate arrivals, Strategic Migration Partnerships (SMPs) and the relevant bodies in Scotland, Wales and Northern Ireland should complete the attached template (accompanying this letter and summary document) setting out their regional/national response for ARP transitional accommodation and return this by 4 April to SJCUK-LAZURITE-JTAGDUTYOFF@mod.gov.uk. Any early returns will be very gratefully received. The statement of requirements provided should be used to inform these responses.

All SMPs, including those hosted by COSLA, WLGA and the Northern Ireland Executive are being asked to coordinate conversations across their remit to:

- agree how these allocations will be split at a local level, and
- test appetite and ability of local authorities in the region/nation to stand up transitional accommodation themselves.

Both UKG procured and council-led transitional accommodation (to be provided on a voluntary basis, with appropriate funding) contribute towards accommodating the overall regional/national allocation - see sections 2 and 3 below for further detail. While the regional/national allocation is for arrivals into transitional accommodation, the expectation is that arrivals will be supported into settled accommodation within the same region/nation, as far as possible. We will keep these allocations under review and work with local government on these allocations going forwards, but every region/nation is expected to play their part in supporting this vulnerable cohort. Local authorities not able to support with transitional accommodation should consider how they can support moves into settled accommodation including via the Find Your Own pathway.

These allocations are based on a population share approach but also account for where areas are already hosting Afghans in transitional accommodation who remain unmatched. We recognise that this approach is not perfect but have opted for a straightforward but clear approach in order to provide regions/nations with certainty more quickly, enabling you to plan for the year ahead.

However, we are committed to undertaking longer-term work, in collaboration with local government, to explore a resettlement indexing tool (based on that used for asylum seekers) to ensure our approach is evidence based and informed by a variety of factors that influence an area's capacity to accommodate new arrivals. Regions and nations will be able to work flexibly within that and may of course agree an approach

that involves subregions or groups of councils working together within that total allocation

2. UKG procured transitional accommodation

We have a responsibility to ensure that Afghans arriving in the UK are able to start their lives safely and securely. **In the short term, we need 1,000 bed spaces urgently.**

To that end, **we are urgently working to procure transitional accommodation, mainly in the form of hotels to support new arrivals under the ARP.** This is to be able to continue to move people to safety against our urgent requirements. We are keen to do this with the support of councils as far as possible.

Any contribution you make now will count towards your regional/national allocations and we would be extremely grateful if local authorities are able to come forward with offers on this.

If offers of support are not forthcoming, we will need to change our approach and commence procurement directly to ensure that we can resettle eligible persons. UKG would look to procure hotels in every region/nation, in line with the allocation, and will work with councils with those hotels to ensure support is put in place.

3. Council-led transitional accommodation

We think that giving local authorities greater control over where and how ARP households are accommodated, could improve cohesion and integration outcomes. That is why, as part of meeting your overall allocations, we are keen to test this with a small number of areas who are willing to stand up transitional accommodation themselves, as part of a co-designed pilot. We would encourage interested councils to express their interest through the regional/national response that SMPs are coordinating.

4. Provision of housing and integration support to arrivals

All local authorities hosting transitional accommodation, whether procured by UKG or stood up by themselves, will also need to provide the wraparound integration support, and can draw down the integration tariff to do so.

For those in transitional accommodation from 1 March, claims should be made under the new, single tariff of £24,110 per arrival claimable over a three-year period. The new funding instructions will be available in late spring 2025; in the meantime, the summary of funding included with our previous letter is re-attached for ease and indicates the main changes. For those who were in settled accommodation before 1 March, claims should be made on the old tariff under the previous Funding Instructions (FIs).

While the regional/national allocation is for arrivals into transitional accommodation, the expectation is that arrivals then **will be supported into settled accommodation within the same region/nation**, as far as possible.

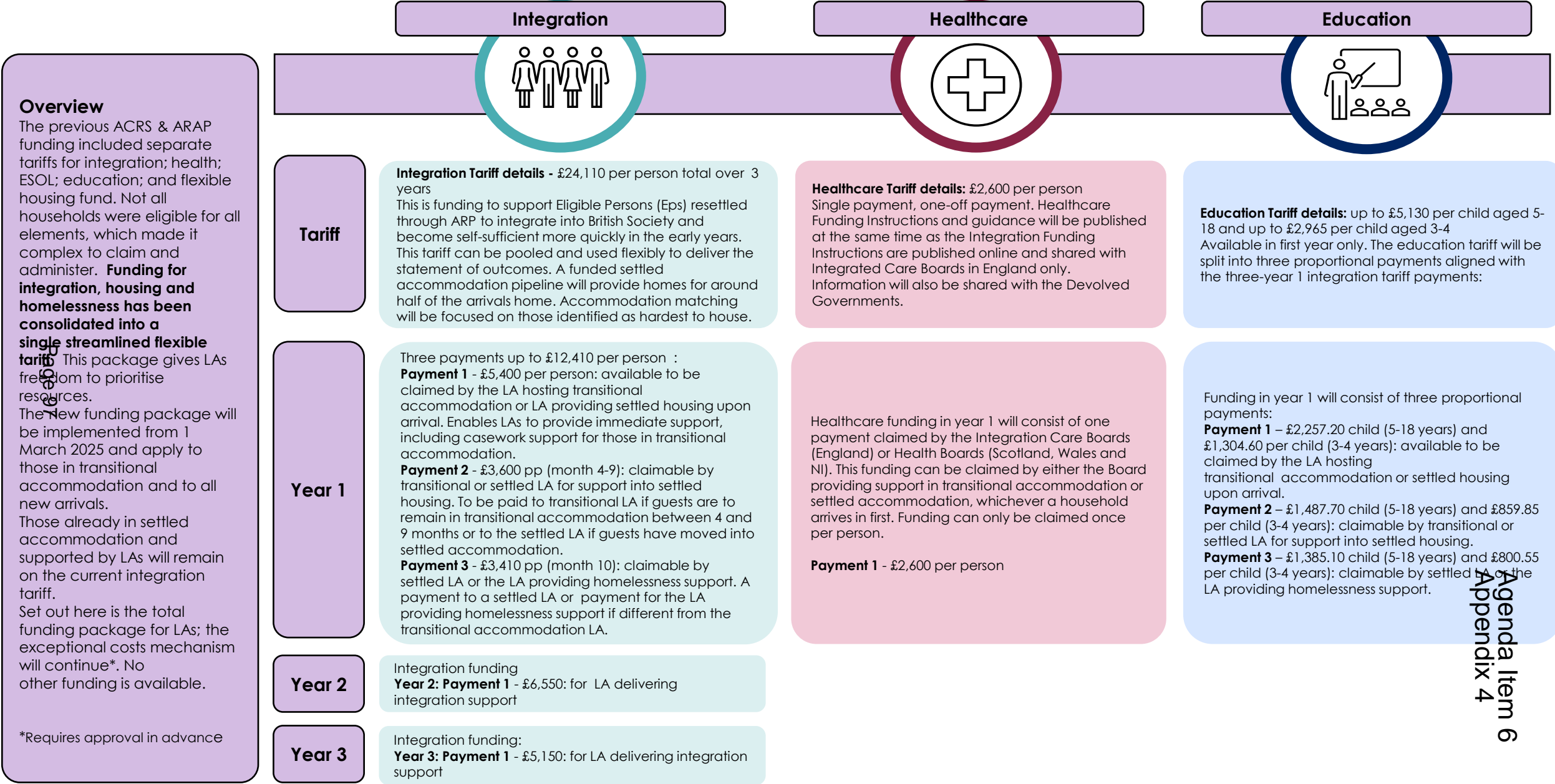
Local authorities are asked to provide case working support for new arrivals, using the tariff funding, to support them to move-on into settled homes, enabling them to establish roots and integrate into local communities and begin the path to self-sufficiency. We are particularly pleased to be working with the 14 councils where there is existing transitional accommodation to support housing move-on for this group.

The Home Office will continue to match households into available properties; we expect the pipeline to accommodate roughly half of arrivals in the long term. Matching guidance is being adjusted to ensure as far as possible that available properties are allocated to households with greater housing need, while limiting voids. This updated guidance will be published in the coming weeks.

As around half of eligible persons will not receive an allocation of settled accommodation through the matching process, households are also being encouraged to search for and secure private rental properties through the Find Your Own (FYO) accommodation pathway. **We are asking all councils to consider and accept referrals made through FYO in this collective effort on resettlement** – to support in the property search as local experts, helping resettled households find suitable and sustainable tenancies that are most conducive to their longer-term integration. The integration tariff - providing up to three years funding - is available for every individual accepted and supported into your area.

Queries and next steps

If you have any queries and to begin discussions on your regional/national allocation, please contact your SMP.



Overview

The previous ACRS & ARAP funding included separate tariffs for integration; health; ESOL; education; and flexible housing fund. Not all households were eligible for all elements, which made it complex to claim and administer. **Funding for integration, housing and homelessness has been consolidated into a single streamlined flexible tariff.** This package gives LAs freedom to prioritise resources.

The new funding package will be implemented from 1 March 2025 and apply to those in transitional accommodation and to all new arrivals.

Those already in settled accommodation and supported by LAs will remain on the current integration tariff.

Set out here is the total funding package for LAs; the exceptional costs mechanism will continue*. No other funding is available.

*Requires approval in advance

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Afghan Resettlement Programme (ARP)

FAQs

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ARP arrivals and regional allocations

Q: Are you able to share further details of the annual regional allocation and the duration of the ARP scheme?

- Over the past 12 months, we have welcomed around 6-7000 families and although it is hard to predict with certainty, we expect this pace to continue. This figure consists of expected arrivals across all Afghan schemes including the Triples review, Afghan Relocation and Assistance Policy (ARAP), and the Afghan Citizens Relocation Scheme (ACRS) family reunion pathway. As elements of the schemes remain open to applications, this is our best assumption.
- Ministers confirmed at the recent webinar that we will be moving to be a model based on regional allocations where every area plays their part but also has more certainty of arrivals from which to plan. We are working up details now as to how this could work and will want to work closely with councils and the LGA, COSLA and WLGA over the next few months to design this in further detail.
- We are clear, however, that this cannot be an endless process and ultimately, the Government intends to reach a position where the UK Afghan resettlement schemes can be closed.

Q: Will commitment to numbers of new arrivals received in each local authority (LA) be voluntary or mandatory?

- All local authorities will be expected to play their part in providing support to the scheme as part of a joint endeavour between central and local government, including supporting people housed in HMG procured transitional accommodation to move-on successfully or providing transitional accommodation directly with the right funding and overall arrangements.

Q: How will arrival allocations be decided including for the devolved nations?

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- Our objective is to achieve a fair and sustainable long-term system for resettlement where every council and part of the UK does their bit. To enable this, we want to work towards a model where each region receives an agreed allocation of new Afghan arrivals into transitional accommodation.
- We are working up details now as to how this could work and will want to work closely with councils and the LGA, COSLA and WLGA and our partners directly in the devolved nations to work through how this can best be managed within their areas.

Q: How will arrival numbers impact upon on the safe and legal routes cap?

- The government is retaining the power at Section 60 of the Illegal Immigration Act 2023 to set an annual cap on the number of people who arrive into the UK via safe and legal routes. We will continue to engage with partners, including local authorities, to ensure the cap is set appropriately and aligns with broader arrangements to create a more sustainable and well-managed system. Further information will be shared in due course.
- The Government's priority is the resettlement and relocation of those already identified as eligible. The government's approach to resettlement is to consider the significant and increasing challenge of global displacement and seek to address root causes, deliver effective upstream interventions, and offer resettlement, in line with the UK's capacity to welcome and integrate refugees.

Q: What checks and assurances can we get around safeguarding around new arrivals and what assurance can you provide around the removal of anyone who breaks the law in this way?

- The people who are relocated here, have been granted indefinite leave to remain in the UK and are not illegal immigrants, asylum seekers or refugees. All Afghans undergo thorough security checks before arriving in the UK.
- As part of their pre-departure orientation, the rights and responsibilities of those arriving as well as standards of behaviour are covered. Anyone who commits an offence will be dealt with in the usual way under the criminal justice and immigration system.

Funding

Q: What is the £3 million pre-ARP housing caseworking funding for, and can you clarify what you mean by casework?

- We are pleased to offer an additional £3 million funding shared between councils in England, Scotland and Wales, where MoD defence estate (whether RSOM or TSFA) or hotels are currently in use as transitional accommodation. This is intended for bespoke housing casework support the move on of EPs currently staying in these sites, ahead of the new ARP tariff.
- Previous experience of bridging hotel exit has shown that local authorities are best placed to facilitate move-on into settled housing, as an integrated part of their broader resettlement work. Councils and caseworkers may work with His Majesty's

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Government (HMG) and other councils, the Voluntary and Community Sector (VCS), housing providers and private sector landlords as appropriate to facilitate access to suitable settled housing across the UK for the households currently in the transitional accommodation.

Q: What overall funding will be available from HMG to enable councils to support Afghan arrivals?

- Afghan resettlement funds have historically been distributed across multiple pots. Under the Afghan Resettlement Programme, we will ensure a simpler landscape that reduces administrative burdens, maximises value for money and allows for longer-term planning and funding certainty. This means streamlining ongoing funding into a **core tariff amounting to £24,110 over 3 years for all arrivals** on the Afghan Resettlement Programme from the 1st of March. This is an amendment to the former £20,520 integration tariff to incorporate the wraparound, housing and homelessness support elements that were previously distributed through the Wraparound Support, Flexible Housing, and temporary accommodation and homelessness support funds, which will no longer be available. This will include funding to allow council capacity specifically for housing move-on supported by caseworkers.
- Tariff funding may be pooled and used flexibly to deliver the statement of outcomes for all those who it is being claimed for.
- **In addition to the core tariff, there will remain separate one-time education and health tariffs.** These will be at a rate of:
 - £5,130 per child between the ages of 5 and 18, and £2,965 per child between the ages of 3 and 4 years for education costs in the first year, and;
 - £2,600 per person for all for health costs in the first year

Q: The full funding breakdown is:

- **There will be a 3-year Tariff of £24,110 per person** to support all new resettled Afghan arrivals to integrate into the UK and become self-sufficient more quickly in the early years. (This is explained in a separate funding note with more detailed funding instructions to follow).
- In Year 1, local authorities will be able to claim:
 - i) £12,410 per person – Integration tariff
 - ii) £ 5,130 per child (5-18 years) – Education tariff
 - iii) £ 2,965 per child (3- 4 years) – Education tariff
- Funding in year 1 will consist of three payments:
 - i) **Payment 1 - £5,400 pp (44%)**, an initial tariff payment to help meet upfront costs of providing support to people in transitional accommodation. The funding may be

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claimed on the arrival of people into transitional accommodation and in line with the HO claims submission schedule. *Paying it in a lump sum rather than per person per night is to enable councils with transitional accommodation to have the certainty of funding to enable the recruitment of staff as necessary to provide caseworking, initial orientation and integration support*

- ii) **Payment 2 - £3,600 pp (29%)**, a second payment to cover months four to nine. This can be claimed once and by either the transitional or settled LA for ongoing support in transitional accommodation or to support household's move into their settled home and to integrate there. *The second payment point at month four aims to help ensure the right council receives the funding depending on how long the individual has needed to reside in transitional accommodation*
 - iii) **Payment 3 - £3,410 pp (27%)**, the final payment in year one that can be claimed once in the tenth month by either the settled LA or the LA providing homelessness support.
- **Year 2: Payment 4 - £6550 per person (single payment)**: to settled LA for support in year 2 if they continue to support under the scheme and the beneficiaries remain in the local authority area.
 - **Year 3: Payment 5 - £5150 per person (single payment)**: to settled LA for support in year 3 if they continue to support under the scheme and the beneficiaries remain in the local authority area.
 - **In addition to the core tariff, there will remain separate one-time education and health tariffs**. These will be at a rate of:
 - i) £5,130 per child between the ages of 5 and 18, and £2,965 per child between the ages of 3 and 4 years for education costs in the first year, uprated from £4,500 and £2,600 respectively, and;
 - ii) £2,600 for all for health costs in the first year
 - The education tariff will be split into three payments aligned with the three-year 1 integration tariff payments:
 - i) Education Payment 1 – £2,257.20 child (5-18 years) and £1,304.60 per child (3-4 years): available to be claimed by the LA hosting transitional accommodation upon arrival.
 - ii) Education Payment 2 – £ 1,487.70 child (5-18 years) and £859.85 per child (3-4 years): claimable by transitional or settled LA for support into settled housing.
 - iii) Education Payment 3 – £ 1,385.10 child (5-18 years) and £800.55 per child (3-4 years): claimable by settled LA or the LA providing homelessness support.
 - The health care tariff may be claimed during Year 1 by the relevant healthcare provider in England, Scotland, Wales and Northern Ireland.

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Q: Are local authorities able to use 'wrap around support' funding which was received when previously supporting the ARAP cohort?

- Local authorities may use any unused Home Office (HO) funding claimed and received for ACRS and ARAP arrivals to continue to support the statement of outcomes for the ARP, which is a direct successor of the former schemes.

Q: How will funding work in two tier local authority areas?

- Local authorities may continue to decide how they want to receive the HO funding.

Q: Can a local authority keep any savings made where they are successful settling a family into accommodation?

- Tariff funding may be pooled and used flexibly to deliver the statement of outcomes for all those who it is being claimed for. It may not be used for any other people who do not qualify for the grant funding or who are covered under any other HMG grant funding.
- Local authorities should only claim funding that they require and not to seek to profit.
- If families move on quicker from transitional accommodation to settled accommodation (either via PRS or HMG sources), we expect both LAs involved to be in closely communication and decide how best to resolve any funding issues/claims.

Q: Will any leftover funding be transferred from the transitional local authority to those offering the settled accommodation?

- LAs are expected to agree all aspects of funding to address move-on requirements.
- We expect local authorities to discuss and arrange any transfer of tariff funds amongst themselves. The Home Office will not be involved once funding has been paid to local authorities.

Q: How will LAs claim for exceptional costs for situations like Special Education Needs (SEN) claims, property adaptations or social care?

- Exceptional cost funding may be sought to cover essential costs incurred above and beyond what could reasonably be regarded as normal expenditure and not available through other mainstream funding e.g. for major property adaptations, support for children with complex identified educational needs or social care provision. We do not cover the cost of extensions to properties from this funding. Further information can be found in the funding instructions which will be published in late spring 2025.

Q: Will the current claims forms / procedures / claim periods remain as is for existing families or will they all be required to switch to new instruction forms / procedures?

- The claims forms and process for the new funding package will be designed to closely mirror existing claims procedures.
- **We encourage local authorities to reconcile claims under the current Hotel Wraparound funding instructions and submit finalised claims for those they**

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provided support to at transitional sites, by 31 May 2025 at the latest. If claims are not submitted by this date, the Home Office will assume that there will be no claim forthcoming. Local authorities are encouraged to reach out to the Home Office if they need support in submitting these claims.

Q: If a family is matched to property now but don't move until after 1st March 2025, do they get new funds or the current?

- The new funding package is only applicable to those living in HMG provided transitional accommodation on 1 March 2025.
- Local authorities who are currently supporting individuals in transitional accommodation as of 1 March 2025 will be able to claim the new funding package. They will no longer be able to claim further funding post 28 February 2025 linked to previous funding instructions for households who are not in settled home.
- **We encourage local authorities to reconcile claims under these funding instructions and submit finalised claims for those they provided support to at transitional sites by 31 May 2025 at the latest.** If claims are not submitted by this date, the Home Office will assume that there will be no claim forthcoming. Local authorities are encouraged to reach out to the Home Office if they need support in submitting these claims.

Q: What happens after the first three years funding-wise?

- The integration tariff can be claimed by LAs for the first 3 years only, after which households will be expected to support themselves. There will be no further integration funding available at the end of this 3-year period. This is also applicable for to those families who arrived in the UK under the ACRS and ARAP schemes since 2021.

Hotels

Q: Is the opening of hotels as transitional accommodation going to continue to be by agreement with the LA?

- The success of the ARP is contingent upon the cooperation between HMG and local authorities. As the continued and invaluable support from local authorities has been instrumental to the successful operation of both our transitional accommodation sites and supporting moves into settled accommodation, we expect that local authorities will continue their brilliant support of Afghans under ARP.

Q: What are the detailed roles and responsibilities of the hotels?

- ARP marks a fundamental shift in the Government's approach to Afghan resettlement, drawing together the existing schemes into one pipeline with a uniform offer of

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funding and support once eligible individuals arrive in the UK, becoming a cross-Government effort.

- The MoD will procure hotels, provide oversight and assurance to the management of the hotel with the support of Home Office Liaison Officers (HOLOs) who will be available on-site to assist with the families' transition to life in the UK. As the expert leaders of integration support, we will rely on local authorities, supported by additional funding provided by HMG, to continue to provide the integration support to Afghan families.

Q: Will procurement of hotels include catering offers?

- Yes, procurement will include catering offers.

Q: Will any London borough be considered for a hotel?

- Our strong expectation is that every local area, including London Boroughs, will play their part in terms of establishing transitional accommodation and helping to resettle and integrate their regional fair share of Afghans into their local areas. This will ensure an equitable share across the UK. We welcome offers on hosting transitional accommodation.

Q: Will previous bridging hotels be procured for ARP?

- The decision to contract an individual site will ultimately rest on its suitability for the ARP, but we will take into account local authority feedback.

Q: Has consideration been given to procuring 'smaller' hotel or contingency sites to ease dispersal pressures?

- When considering the placement of transitional accommodation for new Afghan arrivals, the Government works closely with Strategic Migration Partnerships and local authorities to consider pressure on local areas and community cohesion. We will work closely with local authorities to refine policies over the coming months via the appropriate fora, including the Resettlement Local Authority Network (RLAN).

Q: Could you update on what lessons have been learnt from the previous bridging hotels and schemes and how these are being addressed

- We always seek to apply the learning from previous programmes and looked carefully at hotel exit when we were designing this new process. Lessons learnt from 'hotel exit' and more generally through Afghan resettlement to date including council feedback to date have helped shape for example:
 - the maximum length of time in transitional accommodation at 9 months to strike the right balance between time required to effectively casework and support people to move into settled but not creating a dependency culture,
 - the centrality of caseworking to the model seeing its success especially in hotel exit

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- the continuing need for a settled pipeline of accommodation to be prioritised for those large and complex families to enable move-on from hotels for the hardest to house and prioritising expressions of interest for the third round of LAFH that are for large properties

Support for families

Q: Please can you clarify whether the MoD, Home Office and Mears will continue to manage the move-on and this will not be the responsibility of the local authority?

- We are very grateful to those local authorities who have been instrumental in providing Afghans with the best possible start to their integration journey in the UK at Defence transitional sites. The continuing success of ARP relies on your invaluable support and assistance and MHCLG is making additional funding available to support the move-on of households currently in these transitional sites (or arriving before implementation of ARP) into settled housing, through intensive case working. The MoD is still committed to gradually returning the Defence Estate to its original use.
- From March 1st, all Afghans including those residing in transitional sites will be switched to the ARP. As transitional accommodation will be limited to 9 months, HM Government is looking to work together with local authorities to support Afghans' move-on during this time.

Q: How do you intend to change and improve the Find Your Own Accommodation Pathway to make it more navigable for Afghan families and facilitate access to Private Rental Sector (PRS)?

- We know that the 'Find Your Own' (FYO) pathway supported by intensive case working can deliver; as at end January 2025 over 3,500 people had moved into the private rented sector through this pathway, right across the whole country and not just in the place they started. FYO products for councils and Afghan councils are uploaded on the Knowledge Hub.
- We are refreshing the FYO products available to local authorities on how to support Afghans into settled PRS accommodation and would welcome your views on the existing process and how to overcome any challenges or barriers to date. We are also planning to produce new FYO materials to better inform resettled Afghans of their housing options and the property search process.

Q: What support is available to help households overcome barriers to private rental sector housing access resulting from for instance LHA rates and benefit caps?

- The new streamlined and flexible tariff funding allows councils to decide how best to support move on. For example, you might choose to top up rents to make a property affordable and then support them to secure work so that they can sustain their rent independently.

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- There are also a range of useful resources, including national Rightmove listings within LHA rates on Knowledge Hub, which we are also updating. We are also currently looking at ways to facilitate practice sharing between councils.
- It is also important to encourage arrivals to be realistic in their expectations of where they can live while relying on benefits and encouraging them to consider affordable locations and properties.

Q: What is the name of the organisation commissioned to provide cultural orientation support prior to arrival into UK?

- The International Organization for Migration (IOM) will continue to provide pre-departure cultural orientation support. More details can be found here: Pre-Departure & Post-Arrival Support Resources for local authorities | IOM United Kingdom.

Q: How would homeless responsibilities be shared beyond LA areas with hosting transitional accommodation?

- Our objective is to achieve a fair and sustainable long-term system for resettlement, where every council and part of the UK does their bit. To enable this, we want to work towards a model where each region receives an agreed allocation of new Afghan arrivals into transitional accommodation.

Q: Families on Reception, Staging and Onward Movement (RSOM)/ Transitional Serviced Family Accommodation (TSFA) sites for over 12 months. Who is responsible for their on-going accommodation needs?

- The support of all local authorities across England, Scotland and Wales is required to help move Afghans from MoD Transitional Accommodation into settled homes in other parts of the UK.
- We are expecting an increase in FYO activity as local authority's work with Afghans currently on MoD estate, in an effort to move them on, alongside matching to Home Office coordinated offers. Some people have been on the MoD Estate for over 12 months, and we appreciate your efforts in helping welcome families into your communities.

Accommodation

Q: Will there be details on what is classed as transitional accommodation? Current SFA arrangements are for 3 years. Is this settled or transitional?

- Transitional accommodation includes all accommodation previously procured by HMG and new hotel accommodation procured by the MoD for the purpose of providing temporary accommodation for all eligible persons under ARP.

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- Types of accommodation can include hotels and serviced apartments alongside reduced use of the Defence estate.
- Transitional accommodation is not, and has never been, intended to be a settled housing solution. Transitional accommodation is provided as a safe interim solution while the UK government continues to support households to find their own settled homes.
- MoD Service Family Accommodation (SFA) that was leased direct to families or local authorities is regarded as settled accommodation. At the end of the MoD lease families will be expected to find their own accommodation unless the MoD offers an extension to them. Extensions may be offered in exceptional circumstances.

Q: How was the 9-month transitional accommodation period decision reached?

- All arrivals on the Afghan Resettlement Programme will be provided with transitional accommodation for up to 9-months. This transitional arrangement is intended to provide a reasonable timeframe for newly resettled people to orient into the country and is intended to strike a balance between allowing people adequate time to work towards independent living in the longer-term, without creating dependency, and having regard to the overall value for money for the scheme.
- Local authorities will be expected to provide case working support to orientate and sign-post new arrivals to services in the UK and crucially to support them to move-on into settled homes, enabling them to establish roots and integrate into local communities and begin the path to self-sufficiency.
- The expectation is that arrivals will be supported to find their own settled homes via the FYO Accommodation Pathway and with above referenced support from local authorities.

Q: Is a RSOM site considered to be temporary accommodation?

- RSOM sites are Ministry of Defence sites intended for short stays.

Q: Are Mears still working on rehousing from the Transitional accommodation?

- Yes, MoD has engaged Mears to provide additional caseworkers at every Defence site with transitional accommodation under ARP, to facilitate Afghan families to find suitable settled accommodation. These caseworkers will work together with each of the local authorities that have a Defence transitional accommodation site and with whom MHCLG is engaging. Mears support is expected to end later this year.

Q: How are you supporting homelessness services?

- We recognise the impact new arrivals from resettlement schemes can have on LA homelessness services, and so as part of the process of developing this programme, have ensured additional pressures are reflected in the overall available tariff for this group.

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- Under the Afghan Resettlement Programme, funding for housing, temporary accommodation and homelessness support is incorporated into the streamlined single tariff for this group (£24,110 over 3 years).
- This tariff also includes funding for LAs to provide case worker led move-on support, which is intended to support arrivals in finding settled accommodation and reduce homelessness risk.

Local Authority Housing Fund (LAHF)

Q. Larger LAHF properties are often designed by builders as 'executive' level properties and therefore much more expensive than smaller e.g. 3 beds. Is MHCLG able to influence developers on this aspect?

- LAHF provides flexibility for local authorities to determine the most appropriate delivery to deliver LAHF homes as best suits their local housing market. Homes can be delivered via a variety of routes, including, but not limited to: open market acquisitions, right to buy buy-back schemes, direct purchases from developers and development of new stock.
- LAs have chosen a variety of different options to deliver new supply themselves, including conversions of commercial buildings into residential, utilising modern methods of construction (MMC) and working with registered providers to deliver new homes.

Q. In order to prioritise properties for larger families (e.g. 5-bedroom need or larger) further consideration should be given to the grant rate available as these properties tend to cost significantly more than the average property in an area.

- We recognise that sourcing large property for the larger resettlement households can be challenging. Local authorities could explore whether extended families are able to split into two households – for example if they have adult children within the group. In this scenario, two separate properties could be acquired, both with a grant (where terms of the fund are met), within close proximity to meet the needs of larger households.
- The use of LAHF R3 funding to create one large home from two smaller units might also be considered. As part of the recent LAHF 3 expression of interest (EOI) invitation (January 2025), we asked local authorities to indicate if they would be interested in delivering very large homes if a higher grant rate was available. We will shortly be contacting local authorities who submitted EOIs with the outcome of this process and have prioritised within that EOIs that offered larger properties as we know that is where the need is most acute for Afghan families.

Q. If LAHF is one of the main vehicles for delivering settled housing going forward, how has this been assessed against wider LA affordability/ pressures to match fund and lack of affordable housing in the market to purchase?

- The LAHF grant rate per property is calculated relative to local property prices and therefore should reflect the cost of housing within the local authority. The programme

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is designed to fund only part of the property (accounting for future income) as is the case for similar programmes like the Affordable Homes Programme.

Q: With LAHF 3, has MHCLG reviewed the size mix of properties being asked for, relative to what the actual need is?

- In developing plans for future settled accommodation for the cohort, we are and will continue to take into account all the lessons learned from Local Authority Housing Fund (LAHF) delivery to date and work with local authorities in order to ensure that any housing delivered reflects the needs of the cohort.
- In the recent LAHF 3 EOI process, we invited LAs to indicate if they would be interested in delivery of very large homes. We will be contacting the LAs who expressed interest shortly and have prioritised within that EOIs that offered larger properties as we know that is where the need is most acute for Afghan families.

Q: You didn't use some of the previous LAHF properties – will this be any different?

- All Local Authority Housing Fund (LAHF) rounds are now available to all Afghan arrivals regardless of which scheme they arrived under, which will maximise our ability centrally and locally to match properties to families. We have already seen an increase in the uptake of properties.

Communications

Q: How quickly are we likely to find out if we are having hotels stood up in our area?

- Support and assistance from local authorities is important for the success of HMG's Afghan resettlement efforts; where possible we will involve LAs in the decision-making process to stand up hotels used as transitional accommodation and help you understand funding arrangements. LAs will also be invited to attend hotel visits where possible to ensure involvement throughout the procurement process. It is our expectation that all local authorities will play their part in this important endeavour to ensure an equitable share across the UK.

Q: Is communication from the Home Office to local authorities expected to improve?

- We will continue to utilise existing engagement forums with local authorities and Strategic Migration Partnerships and share more information as plans develop and soon as we are able to do so. We value any feedback from local authorities on ways to improve our engagement.

Q: How will you be communicating with local authorities going forwards?

- We are committed to working with local government as we implement these changes. We will continue to speak with you directly via dedicated engagement fora including regular webinars, the RLAN meetings and other senior ministerial and local government fora.

URGENT DECISIONS

Head of Service: Rod Brown, Head of Housing & Community
Report Author Andrew Bircher
Wards affected: (All Wards);
Urgent Decision?(yes/no)
If yes, reason urgent decision required:
Appendices (attached):

Summary

To report to the committee two decisions taken by one of the Directors and / or Chief Executive on the grounds of urgency, in compliance with the requirements of the Constitution.

Recommendation (s)

The Committee is asked to:

- (1) Note the urgent decisions taken and the reasons for that decision.**

1 Reason for Recommendation

- 1.1 To report to the Council decisions taken by one of the Directors and / or the Chief Executive on the grounds of urgency, in compliance with the requirements of the Constitution.

2 Background

- 2.1 The scheme of delegation sets out that the Chief Executive and Directors are authorised to take decisions on grounds of urgency regarding matters which would otherwise be reserved for determination by a Committee or Council. A matter can be deemed urgent if, in the reasonable opinion of the officer concerned, a delay would seriously prejudice the interest of the Council or of the public and it is not practicable to convene a quorate meeting of the relevant decision-making body in sufficient time to take the decision.

- 2.2 Since the last ordinary meeting of the Community and Wellbeing Committee two urgent decisions have been taken by one of the Directors or the Chief Executive in consultation with the Chair, Cllr Clive Woodbridge (in the case of decision 154, the Chair of Strategy and Resources committee, Cllr Neil Dallen was consulted on the decision as well) and published in Member News in line with the Council's Constitution, Appendix 2, Paragraph 3.1. iii. The decisions are set out below:

2.2.1 **Decision 149** – Homelessness Prevention Grant (HPG) consultation

2.2.2 **Urgency reason for decision 149** – The consultation response deadline is 11th March, which is before the next scheduled meeting of C&W committee.

2.2.3 **Decision 154** – Postponement of committee decision relating to a charitable organisation operating in the borough, to consider further information which has been supplied, and act accordingly.

2.2.4 **Urgency reason for decision 154** – To minimise unnecessary hardship and uncertainty to a voluntary organisation – decision needed by 14th May 2025. Due to human error, there was a delay in publishing this to all members by one month. We have now clarified the process to those involved to ensure this does not happen again.

2.2.5 The decision affects both committees as the 25/26 budget for S&R assumed an income budget for the property affected whereas in the past this income has been met from expenditure budgets in C&W committee. The issue has been further discussed at the special meeting of the C&W committee on the 17th June.

3 Risk Assessment

Legal or other duties

3.1 Equality Impact Assessment

3.1.1 None arising directly from this report

3.2 Crime & Disorder

3.2.1 None arise from this report

3.3 Safeguarding

3.3.1 None arise from this report

3.4 Dependencies

3.4.1 None arise from this report

3.5 Other

3.5.1 none

4 Financial Implications

4.1 **Section 151 Officer's comments:** Finance are consulted as part of the urgent decision-making process.

5 Legal Implications

5.1 **Legal Officer's comments:** Legal are consulted as part of the urgent decision-making process.

6 Policies, Plans & Partnerships

6.1 **Council's Key Priorities:** The following Key Priorities are engaged:

- N/A

6.2 **Service Plans:** The matter is not included within the current Service Delivery Plan.

6.3 **Climate & Environmental Impact of recommendations:** None.

6.4 **Sustainability Policy & Community Safety Implications:** None.

6.5 **Partnerships:** N/A

6.6 **Local government reorganisation (LGR) implications:** There are no implications from LGR for this report.

7 Background papers

7.1 The documents referred to in compiling this report are as follows:

Previous reports:

- None.

Other papers:

- None.

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