

**Report by the Local Government and Social Care
Ombudsman**

**Investigation into a complaint about
Halton Borough Council
(reference number: 23 005 581)**

19 March 2025

The Ombudsman's role

We independently and impartially investigate complaints about councils and other organisations in our jurisdiction. If we decide to investigate, we look at whether organisations have made decisions the right way. Where we find fault has caused injustice, we can recommend actions to put things right, which are proportionate, appropriate and reasonable based on all the facts of the complaint. We can also identify service improvements so similar problems don't happen again. Our service is free.

We cannot force organisations to follow our recommendations, but they almost always do. Some of the things we might ask an organisation to do are:

- > apologise
- > pay a financial remedy
- > improve its procedures so similar problems don't happen again.

We publish public interest reports to raise awareness of significant issues, encourage scrutiny of local services and hold organisations to account.

Section 30 of the 1974 Local Government Act says that a report should not normally name or identify any person. The people involved in this complaint are referred to by a letter or job role.

Key to names used

Mr X The complainant

Report summary

Housing - Homelessness

Mr X complained the Council did not properly consider his homelessness application after he became homeless in July 2022 due to fleeing domestic violence. He says the Council did not carry out its duties towards his application, which meant he missed out on accommodation opportunities.

Finding

Fault found causing injustice and recommendations made.

Recommendations

The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. (Local Government Act 1974, section 31(2), as amended)

In addition to the requirements set out in the paragraph above, the Council should take the following actions to remedy the injustice identified in this report.

Within three months of the date of this report, the Council should:

- write to Mr X and apologise for the handling of his homelessness application and for failing to accept the main housing duty;
- pay Mr X £500 to recognise the distress caused to him;
- pay Mr X £150 a month, from March 2023 for loss of accommodation that he would otherwise have had the opportunity to access;
- pay Mr X £200 to recognise the time and trouble in pursuing his complaint;
- write to Mr X and accept the main housing duty, backdating this to 56 days after the relief duty was accepted;
- discuss with Mr X whether he currently needs temporary accommodation; and
- register Mr X on the Property Pool Plus (PPP) scheme and provide him with the support to access the scheme. His account should also show as backdated in line with the previous recommendations.

Within 3 months of the date of this report the Council should review how it ensures:

- it is giving written decisions about whether it owes a main housing duty; and
- applicants can access the PPP scheme and its support for vulnerable users.

The complaint

1. Mr X complained the Council;
 - did not provide refuge accommodation when he was in priority need;
 - did not provide enough support for Mr X to complete his applications;
 - did not complete the referral to other Local Authorities;
 - failed to properly communicate with him about his applications;
 - failed to provide him with the requested private bond information;
 - failed to understand its duties to someone fleeing domestic abuse; and
 - delayed considering his complaint.
2. Mr X complained the Council's actions caused further distress at an already difficult time for him as he was fleeing domestic abuse. He says this meant he missed opportunities to secure accommodation.

Legal and administrative background

The Ombudsman's role and powers

3. We investigate complaints about 'maladministration' and 'service failure'. In this report, we have used the word 'fault' to refer to these. We must also consider whether any fault has had an adverse impact on the person making the complaint. We refer to this as 'injustice'. If there has been fault which has caused an injustice, we may suggest a remedy. (Local Government Act 1974, sections 26(1) and 26A(1), as amended)
4. The law says we cannot normally investigate a complaint when someone could take the matter to court. However, we may decide to investigate if we consider it would be unreasonable to expect the person to go to court. (Local Government Act 1974, section 26(6)(c), as amended)
5. When considering complaints, we make findings based on the balance of probabilities. This means that we look at the available relevant evidence and decide what was more likely to have happened.
6. We may investigate matters coming to our attention during an investigation, if we consider that a member of the public who has not complained may have suffered an injustice as a result. (Local Government Act 1974, section 26D and 34E, as amended)
7. We cannot investigate late complaints unless we decide there are good reasons. Late complaints are when someone takes more than 12 months to complain to us about something a council/care provider has done. (Local Government Act 1974, sections 26B and 34D, as amended)

Homelessness law and guidance

8. Part 7 of the Housing Act 1996 and the Homelessness Code of Guidance for Local Authorities set out councils' powers and duties to people who are homeless or threatened with homelessness.

Homelessness applications

9. If someone contacts a council seeking accommodation or help to obtain accommodation and gives 'reason to believe' they 'may be' homeless or threatened with homelessness within 56 days, the council has a duty to make

inquiries into what, if any, further duty it owes them. The threshold for triggering the duty to make inquiries is low. The person does not have to complete a specific form or approach a particular department of the council. (Housing Act 1996, section 184 and Homelessness Code of Guidance paragraphs 6.2 and 18.5)

10. Councils must complete an assessment if they are satisfied an applicant is homeless or threatened with homelessness. Councils must notify the applicant of the assessment. Councils should work with applicants to identify practical and reasonable steps for the council and the applicant to take to help the applicant keep or secure suitable accommodation. These steps should be tailored to the household, and follow from the findings of the assessment, and must be provided to the applicant in writing as their personalised housing plan (PHP). (Housing Act 1996, section 189A and Homelessness Code of Guidance paragraphs 11.6 and 11.18)

The relief duty and interim accommodation

11. Councils must take reasonable steps to help to secure suitable accommodation for any eligible homeless person. This is called the relief duty. When a council decides this duty has come to an end, it must notify the applicant in writing. (Housing Act 1996, section 189B)
12. A council must secure interim accommodation for an applicant and their household if it has reason to believe they may be homeless, eligible for assistance and have a priority need. This is called interim accommodation. (Housing Act 1996, section 188)
13. Examples of applicants in priority need include people with dependent children, pregnant women, people who are vulnerable due to serious health problems or disability, and victims of domestic abuse.
14. The relief duty ends when the applicant accepts or refuses an offer of accommodation which is suitable and likely to be available for at least 6 months, or, failing this, if 56 days have passed.

The main housing duty and temporary accommodation

15. If a council is satisfied an applicant is unintentionally homeless, eligible for assistance, and has a priority need, it has a duty to secure that accommodation is available for their occupation. This is called the main housing duty. (Housing Act 1996, section 193 and Homelessness Code of Guidance 15.39)
16. The accommodation a council provides until it can end the main housing duty is called temporary accommodation. If a council ends its interim accommodation duty, but then goes on to accept the main housing duty, it still has a duty to provide temporary accommodation. Interim and temporary accommodation can be the same physical property. What changes is the legal duty under which a council provides it.

Domestic abuse and homelessness

17. The law says it is not reasonable for someone to continue to occupy accommodation if it is probable this will lead them to experience violence or domestic abuse. (Housing Act 1996, section 177)
18. Councils should be alert to the wider role they play in ensuring safety for victims of domestic abuse. They should take account of any social considerations, including risk of violence or abuse within a particular locality, which might affect the suitability of accommodation offered to an applicant to prevent or relieve

homelessness, or under the main housing duty. (Homelessness Code of Guidance paragraphs 21.15 and 21.43)

Circumstances in which both prevention and relief duties may end

19. Councils can end the prevention and relief duties because of an applicant's deliberate and unreasonable refusal to co-operate.
20. Where a council ends the relief duty for this reason the main housing duty will not apply. However, the council will be required to secure that accommodation is available for an applicant who has priority need and is unintentionally homeless, until it makes a final accommodation offer or the duty comes to an end for another reason.
21. Before bringing either duty to an end by issuing a section 193B(2) notice, the council must first issue a warning letter to the applicant. This should tell the applicant that if they deliberately and unreasonably refuse to take any of the steps in their PHP after receiving the warning, the council intends to issue a notice bringing the prevention or relief duty to an end.
22. The warning must explain the consequences of a notice being given and the council must allow a reasonable period after the warning is given before issuing a notice. There is no set reasonable period, but councils should ensure sufficient time is given to allow the applicant to rectify the non-co-operation and prevent a notice being issued to end the prevention or relief duty.
23. Notices issued must explain why the housing authority are giving notice and its effect, and inform the applicant of their right to request a review of the decision to issue the notice.

Property Pool Plus scheme

24. The Council uses a scheme to access housing in its area and other Local Authority areas. When applicants make a homelessness application to the Council, it encourages them to register with the scheme to bid for local housing.
25. The scheme says one of the aims is to prevent homelessness and give adequate priority to homeless people to reduce the use of temporary accommodation.
26. The Council uses a housing company acting on its behalf to manage its applications and property access on the scheme.

How we considered this complaint

27. We produced this report after examining relevant documents and discussing the complaint with Mr X.
28. We also considered:

Code of Guidance for Local Authorities;
 - Homelessness (Review Procedure etc.) Regulations 2018; and
 - Homelessness (Priority Need for Accommodation) (England) Order 2002.
29. We gave Mr X and the Council a confidential draft of this report and invited their comments. The comments received were taken into account before the report was finalised.

What we found

What happened

30. Mr X made a homelessness application with the Council in October 2021. He told the Council he was fleeing domestic abuse.
31. The Council recognised Mr X may be in priority need and offered to find him accommodation in a refuge. Mr X refused the refuge accommodation and said he would stay with a friend temporarily.
32. Mr X asked the Council to refer him to a different Local Authority. The Council asked Mr X to provide documentation, to finish the homelessness assessment and register for its Bond Guarantee Scheme.
33. The Council says it continued to try and contact Mr X about his application until January 2022, but as it had no response from him, it closed his application.
34. Mr X contacted the Council again after his application was closed. The Council say it tried to return his calls but again could not reach him.
35. Mr X contacted the Council for a third time in July 2022 and told the Council he was homeless and fleeing domestic abuse. Mr X said he had been refused applications by other Local Authorities and told to present to the Council. Mr X told the Council he now wanted to progress a homelessness application.
36. The Council completed its homelessness application with Mr X on 18 July 2022 and offered Mr X temporary accommodation. Mr X declined the temporary accommodation and said he would stay with family until he could find settled accommodation.
37. The Council emailed Mr X letters accepting the relief duty and his personal housing plan, as well as asking him to register on Property Pool Plus (PPP). It said this would activate his priority banding to bid on suitable properties.
38. The Council also advised Mr X he could search for a private rented property and could apply for the Bond Guarantee Scheme.
39. On 22 July, Mr X asked the Council to refer him to another Local Authority. The Council told Mr X that he needed to finish his registration with PPP, which would enable the Council to specify his preference of area.
40. Mr X continued to ask the Council for the referral to the other Local Authority, and was told his caseworker would respond to his request when they were back from leave. The Council says it checked with Mr X in this time whether he needed temporary accommodation, but he declined.
41. When Mr X's caseworker returned from leave, they discussed Mr X's request for a referral, and his other options, including private renting. The Council again asked Mr X to complete the PPP application. Mr X asked the Council for a list of nearby refuges and said he was having issues registering for PPP as his abuser had registered an account in his name that he could not access. The Council sent Mr X a list of refuges and contact details to support him with his PPP application.
42. On 28 July Mr X asked the Council to refer him to a specific refuge. The Council completed the referral and sent it to the refuge.
43. Mr X also asked for more information about the bond guarantee scheme, and the Council sent him details of how to apply.
44. On 2 August, Mr X asked to move to an alternative specific area and to access the bond guarantee scheme to do this. The Council told Mr X he would need to

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- make a claim for Universal Credit (UC). Mr X said he could not make a claim for UC until his PPP account was rectified, for which he was still waiting. The Council said it could not progress an application with the bond scheme until Mr X made a claim for UC.
45. Mr X completed his UC claim on 10 August 2022. The Council again asked Mr X to complete his PPP application to activate his property banding. Mr X told the Council he felt he was being forced to stay in the local area and did not know how to private rent. The Council again gave Mr X advice on private renting and the bond guarantee scheme.
46. On 26 August 2022, Mr X emailed the Council about rent charges and affordability. The Council confirmed the allowance that Mr X would be entitled to and again encouraged him to complete his PPP application. Mr X confirmed with the Council that he was still considering his choices.
47. The Council tried to contact Mr X in August and September to seek more information about his UC claim and an update on his PPP application. Mr X sent the Council his UC evidence and said he had not registered a PPP application.
48. Mr X continued to send emails in September and October 2022 about the bond guarantee scheme but did not receive a response.
49. The Council then closed Mr X's case. In its records, it said it closed his case because he had stopped engaging and had not provided the documents needed.
50. In April 2023 Mr X complained to the Council. In his complaint he said:
- he told the Council in June 2022 that he needed accommodation;
 - the Council did not explain the refuge process to him and he never heard the result of his referral;
 - the Council told him if he provided evidence of his UC application that he would be able to access the bond scheme;
 - the Council had not supported him to access the PPP application despite his abuser using his details; and
 - he had provided all the information asked and had had no further contact from the Council.
51. Mr X did not receive a response to his complaint and so complained to us. We asked the Council to consider Mr X's complaint.
52. The Council's initial complaint response said it had:
- reviewed Mr X's complaint but a response was not sent to him;
 - completed the homelessness assessment and advised him of the options and services available;
 - made several attempts to contact Mr X about his application before closing his case; and
 - registered Mr X's PPP application in August 2022 and it was currently active.
53. Mr X asked the Council to consider his complaint at stage two in July 2023. The Council sent Mr X an acknowledgement in September 2023 which said the response was delayed.
54. The Council issued its final complaint response in November 2023. In the response it said:

- at times it was difficult to contact Mr X as he did not respond;
- it provided him with a relief duty letter, PHP and details of how to register on PPP to access his priority banding to bid. He was also provided with advice about private renting and the bond guarantee scheme;
- it had found Mr X to be in priority need and had offered him temporary accommodation, but he had declined this;
- Mr X had asked for a referral to another Local Authority, but the Council could not do this until he activated his PPP account. It had provided Mr X with contact details to resolve the PPP account issues;
- it had continued to provide advice on Mr X's options, including details of the bond guarantee scheme, private renting, and available refuges;
- had sent Mr X a case closure letter in November 2022 setting out his appeal rights, however no appeal was lodged;
- a separate agency was responsible for supporting Mr X to access his PPP application and the Council had provided Mr X with the details to contact them. It also contacted the agency on his behalf to ask it to reset Mr X's account. However, Mr X's preference at the time was to live outside the area, and so the Council was satisfied it had done enough. It accepted that the previous information given to Mr X about him having an active application was wrong;
- it accepted it did not respond to some emails in September and October 2023, however it was satisfied that it had already provided the relevant advice for these matters; and
- the case officer had advised Mr X of the outcome of the referral to the refuge.

Analysis

Relief duty and main housing duty

55. The Council accepted it had a relief duty to Mr X and gave him a personal housing plan. Once 56 days passed, the Council had to decide if it owed Mr X a main housing duty.
56. The Council did not issue Mr X with a decision as to whether it owed him a main housing duty. Instead, the Council closed Mr X's case and did not issue a decision or give Mr X his appeal rights. When we asked the Council why it did this, it initially said it had closed the case due to Mr X's deliberate and unreasonable refusal to co-operate.
57. The Council also initially said it accepted it did not follow the legislation to be able to close the case for this reason, but that it remained of the view the decision was right.
58. If the Council did not believe it owed Mr X a main housing duty because of deliberate and unreasonable refusal to co-operate, it should have told him this and set out its reason. It should have also given Mr X the right to appeal the decision.
59. In response to our draft report, the Council changed its view about what legislation it had used to close Mr X's case. It said it had mistakenly told us that it had closed it under deliberate and unreasonable refusal to engage, but that it had lost contact with Mr X and believed him to have withdrawn his application.

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60. In response to our draft report, the Council produced a lost contact letter it says it sent Mr X in November 2022, confirming he had withdrawn his application and setting out his appeal rights.
61. We asked the Council to provide evidence the letter was created and sent to Mr X when it said it was. The Council has been unable to provide any evidence to show this. The evidence provided by the Council shows the letter was likely created in September 2023, 11 months after the Council says it was sent. The Council also says it posted this to Mr X, however there is no evidence to support this, and all previous communication with Mr X was via email or phone due to his homelessness. On the balance of probability, we find Mr X did not receive a decision.
62. The Council has continued to say that it could not engage Mr X and that it tried multiple times to contact him before closing the case. The Council's own records do not support this. There are no entries to show any attempts to contact Mr X after his email on 14 September 2022 and before the closure of his case.
63. The Council has said Mr X did not provide the documents needed for it to be able to make a decision, and this is why it believed it was correct in making the decision to close the case. Having reviewed the communication between Mr X and the Council, it is clear the Council asked Mr X to provide evidence, and Mr X responded providing what he believed to be the evidence asked of him. The Council did not tell Mr X that it did not meet the criteria it needed. Additionally, there were times during the communication where the Council told Mr X that if he could not provide what was being asked, the Council would work with him to find another alternative. It reassured him that it knew he was homeless and in priority need, and its duty to him would not end after 56 days.
64. We remain of the view the correct legislation to close this case if contact had failed would be deliberate and unreasonable refusal to co-operate, and it remains our view that the Council has failed to follow this legislation when closing Mr X's case.
65. As set out in paragraph six, we may investigate matters coming to our attention during the course of an investigation. In response to the draft report, we asked the Council to provide details of other cases during the same time period where the Council relied on the legislation of deliberate and unreasonable refusal to engage. We established there were several other homelessness applicants where the Council did not follow the legislative process and a separate decision will be issued in respect of these applicants.
66. Mr X was led to believe he had done what was being asked of him, and the support was in place to help him be able to complete the application. The Council did not tell him he had not complied, nor did it issue a warning about this according to the legislation to give him the opportunity to correct this.
67. The Council closed Mr X's case despite him continuing to engage and provide the evidence he believed the Council was asking for. It also failed to respond to him when he asked for updates about his case and what he needed to do next. We cannot see the criteria for closing the case under the legislation for unreasonable engagement has been met, and so the decision was made with fault.
68. On the balance of probabilities, we are satisfied that if the Council had told Mr X he needed to provide alternatives, and issued him a formal warning letter about not providing what was needed, he would have provided it.

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69. If the Council had correctly carried out its duties, it would have decided it owed Mr X a main housing duty. This would have been dated from 56 days after the relief duty decision was issued.
70. Failure to accept the main housing duty and issue a decision is fault by the Council, causing Mr X significant injustice. We are recommending the Council write to Mr X and accept the main housing duty, backdating this to 56 days after the relief duty was accepted.

Accessing the housing scheme

71. Mr X asked for a referral to another Local Authority the day after the Council accepted the relief duty. However, it told him it needed to complete a full assessment to do the referral.
72. The Council was already satisfied that Mr X was homeless and eligible, as it had accepted the relief duty. The Council's communication to Mr X and us also says that Mr X needed to be registered with the PPP scheme for the Council to refer him to another Local Authority. This is beyond what the law requires and there is no legal requirement for Mr X to be registered to the scheme before a referral can happen. This was fault by the Council. However, we accept that Mr X accessing the PPP scheme would have provided the same result as a referral and been an easier process with a larger stock of available housing.
73. Mr X told the Council on several occasions that he could not access the PPP account as his abuser had created an account on his behalf which restricted his access. The Council gave Mr X the details to contact the scheme and resolve these issues. However, as the scheme is acting on the Council's behalf, it remained the Council's responsibility to support Mr X in resolving this. The Council has said that it does not consider it could have done more to help, as Mr X expressed a want to move to a different area. However, the areas that Mr X was asking to move to were areas the Council had insisted he needed to be registered with the scheme to access.
74. Additionally, the scheme has a section for assistance of vulnerable people who cannot access the PPP scheme. The Council should have explored this further with Mr X and provided support for him to access the scheme. The handling of Mr X's registration and support for the scheme was fault by the Council.
75. The Council has already told Mr X that he would be in priority band A on the scheme if he registered. We have reviewed the stock of housing on the PPP scheme that Mr X would have had access to if the Council had accepted the main housing duty and resolved his registration issues in a timely manner. There were many suitable properties that Mr X would have had the opportunity to bid on if the Council had registered him and accepted the main housing duty. On the balance of probabilities, having seen the timeframe which people in similar circumstances to Mr X have been offered properties through the scheme, we are satisfied Mr X would have received an offer within six months, and by March 2023.
76. As a result, Mr X has been without the opportunity to bid and has missed offers on suitable accommodation. We are recommending a monthly payment to recognise the impact this has had on Mr X. This will be dated six months after the Council should have accepted the main housing duty, as we are satisfied from this point Mr X would have been housed. We are also recommending the Council register Mr X on the scheme and backdate the application to September 2023, as if the Council had addressed the registration issues, this is likely to be the point Mr X would have had access.

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77. This should ensure Mr X receives an offer in a timely manner, while still allowing him the flexibility and choice of where he would like to live.

Temporary accommodation

78. For reasons already explained, the Council should have told Mr X it owed him the main housing duty. The Council had a duty to secure accommodation that was available for Mr X, and the accommodation a council provides until it can end this duty is called temporary accommodation. (Housing Act 1996, section 193)
79. The Council's records show there were occasions where it offered to arrange temporary accommodation for Mr X, but says he declined this. We have reviewed the emails between Mr X and the Council and are satisfied the Council did give advice about who to contact if Mr X needed temporary accommodation.
80. On the occasion Mr X asked for a referral to a refuge, the Council carried this out.
81. However, the Council has said it told Mr X the result of the referral to the refuge. Mr X says the Council did not tell him. The Council has not been able to evidence that it told Mr X of the outcome until during the complaints process. The Council says an officer told Mr X, but there is no record of this. On the balance of probabilities, we are satisfied the Council did not tell Mr X the outcome of the referral until its complaint response. If the Council had told Mr X of this, he would not have continued to ask what the outcome was. This was fault by the Council causing Mr X further distress and uncertainty. It has also caused Mr X lost opportunity, if the Council had told him of this, Mr X would have had the opportunity to seek alternatives sooner.
82. Once the refuge had refused Mr X, the Council should have told him of the outcome and asked if he needed temporary accommodation. We cannot see that temporary accommodation was discussed or explored after the refuge refused Mr X. This was fault by the Council causing Mr X uncertainty and distress.

Communication

83. Part of Mr X's complaint is the Council did not properly communicate with him about his applications. There is a significant amount of communication between Mr X and the Council about various options. Having reviewed the emails, we are satisfied that on most occasions, Mr X's request for information was answered. However, there were occasions in September and October 2022 where his queries about different schemes went unanswered. The Council then closed his application due to no communication, despite Mr X having sent emails seeking information.
84. Part of Mr X's complaint is the Council did not provide information about the private bond scheme. We can see the Council did give Mr X some information about the scheme when he requested it. However, if the Council had accepted the main housing duty and registered Mr X on the scheme, as previously reasoned, this would have resolved the issues in communication and confusion about different schemes and entitlement.

Complaint handling

85. The Council has already accepted that it did not initially respond to Mr X's complaint and then delayed the stage two response. However, it did not recognise any injustice that this caused to Mr X.
86. There was further fault by the Council in failing to consider Mr X's complaint and then delaying the final response. This caused Mr X time and trouble pursuing his complaint.

Conclusions

87. We find fault with the Council because it failed to:
- meet its homelessness duties to Mr X in line with the law and statutory guidance, and properly explain these duties to him;
 - tell Mr X about key decisions for temporary accommodation;
 - support Mr X to complete his homelessness application; and
 - consider his complaint without delay or any injustice caused to Mr X.
88. When we find fault, we then consider whether that fault caused injustice. There was significant injustice to Mr X from the Council's faults in this case.
89. The Council's failure to follow the legislation and guidance for closing a case due to deliberate and unreasonable refusal to co-operate meant that its decision cannot stand, and Mr X was not given the opportunity to re-engage or given his appeal rights to seek a review of the decision.
90. The Council's failure to accept the main housing duty or tell Mr X about key decisions for his temporary accommodation has meant that Mr X has missed opportunities to secure accommodation.
91. The Council's failure to register Mr X on the PPP meant that he has missed opportunities to bid on properties he would have been successful on.
92. The Council's delay in considering Mr X's complaint and the injustice caused to him has caused him further distress and time and trouble.

Recommendations

93. The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. (Local Government Act 1974, section 31(2), as amended)
94. In addition to the requirements set out in the paragraph above, the Council should take the following actions to remedy the injustice identified in this report.
95. Within three months of the date of this report, the Council should:
- write to Mr X and apologise for the handling of his homelessness application and for failing to accept the main housing duty;
 - pay Mr X £500 to recognise the distress caused to him;
 - pay Mr X £150 a month, from March 2023 for loss of accommodation that he would otherwise have had the opportunity to access;
 - pay Mr X £200 to recognise the time and trouble in pursuing his complaint;
 - write to Mr X and accept the main housing duty, backdating this to 56 days after the relief duty was accepted;
 - discuss with Mr X whether he currently requires temporary accommodation; and
 - register Mr X on the PPP scheme and provide him with the support to access the scheme. His account should also show as backdated to September 2022, the date the Council should have accepted the main housing duty.

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96. Within three months of the date of this report the Council should review how it ensures:
- it is giving written decisions about whether it owes a main housing duty; and
 - applicants can access the PPP scheme and its support for vulnerable users.

Decision

97. We have completed our investigation into this complaint. There was fault by the Council which caused injustice to Mr X. The Council should take the action identified in paragraphs 91 to 94 to remedy that injustice.