

## Written evidence submitted by Crisis (TH0015)

Crisis is the national charity for people facing homelessness. We know that homelessness is not inevitable, and we know that together, we can end it. Crisis is dedicated to ending homelessness by delivering life-changing services and campaigning for change.

Every year we work directly with thousands of people experiencing homelessness across England, Scotland and Wales. We provide vital help so people can rebuild their lives and are supported out of homelessness for good. We use research to find out how best to improve our services, and to find wider solutions to end homelessness for good.

We are pleased the Public Accounts Committee is dedicating an inquiry into tackling homelessness, building on the forensic report of the National Audit Office published earlier this year. Crisis has extensive experience of working to achieve policy change on homelessness across Great Britain, including previously being a member of the Westminster Government's Rough Sleeping Advisory panel; convening an Expert Review Panel on homelessness legislation for the Welsh Government; chairing the Ending Homelessness National Advisory Board advising the Welsh Cabinet Secretary of progress towards their ambition to ending homelessness; convening an expert working group to advise on legislative changes in Scotland; and previously chairing the Homelessness and Rough Sleeping Action Group to make recommendations for the Scottish Government to end homelessness in Scotland. Our Chief Executive is also now a member of the current Westminster Government's Expert Panel, advising the Inter-Ministerial Group on homelessness, and is the UK representative for FEANTSA, the umbrella organisation for homelessness across Europe.

Given this experience we welcome this opportunity to provide our views on the areas of inquiry being conducted by the Public Accounts Committee on tackling homelessness.

### Government's understanding of the extent, causes and costs of homelessness

#### Summary of key points:

- Overall, Crisis agrees the causes of homelessness are better understood within Government. However more can be done to identify the extent of homelessness and gain clarity on people's pathways into homelessness and therefore identify points of intervention. Crisis commissions Heriot-Watt University to model the scale of homelessness across Great Britain, including hidden homelessness such as sofa surfing. We would welcome working with the Government to explore how these forms of homelessness could be recorded nationally.
- Further, Crisis is currently involved in a number of data-led initiatives, adopting an approach from the United States called 'Built for Zero', that uses community data to establish levels of homelessness locally and ascertain solutions for specific cohorts of people. We are seeing this result in more accurately capturing homelessness in a local area – for example in Brent, the data collected through Built for Zero is a 24% increase compared to the data collected for the area via the CHAIN database, currently the most robust data available on homelessness.
- We would welcome the Government's forthcoming strategy on homelessness to consider how it can expand and utilise approaches like Built for Zero to inform evidence-based interventions that both support people to move on from homelessness for good and prevent it from happening in the first place.
- Regarding costs of homelessness, while some of this is becoming more evident in the financial burden being placed on councils due to the levels of the temporary accommodation subsidy and wider welfare cuts, more needs to be understood and data sharing also hampers this picture overall. In particular, there are gaps in accurately capturing overall

## Written evidence submitted by Crisis (TH0015)

costs of homelessness where the cost burden is on other public institutions and departments – for example in health and criminal justice. We believe it would be worth Government exploring ways to capture this to evidence the impact of interventions to the Treasury ahead of the Spending Review and to strengthen the case for wider interventions across departments, and especially housing and welfare, to tackle homelessness.

- Crisis is also calling for the Government to bring together the development of the homelessness strategy with the development of the long-term plan on housing, to ensure wider housing market interventions are also linked to outcomes on reducing levels of homelessness.

### Understanding of causes and extent of homelessness within Government

The causes and long-term solutions of homelessness are well evidenced and reflected in the National Audit Office report on the effectiveness of government in tackling homelessness, which particularly highlights the chronic undersupply of social housing and cuts to welfare, especially the periodic freezing of local housing allowance rates.<sup>1</sup> These drivers are not only making it more difficult for people to avoid homelessness but are also a barrier to resolving homelessness quickly when it does occur. In our experience working with Government across different Departments, these drivers and the impact on homelessness are increasingly well understood, both through Government's own analysis and engagement with stakeholders.

Overall, Crisis agrees with the conclusions of the National Audit Office that there is more data and understanding of homelessness within Government, particularly at a civil servant level. However, the national data available on rough sleeping remains very poor and there are still significant gaps in data on wider forms of homelessness despite improvements in recent years. Some forms of homelessness such as sofa surfing or sleeping in more unconventional places, known as 'hidden forms', are not captured by Government and yet would indicate people living in precarious situations who may be at higher risk of rough sleeping or presenting to the local authority for homelessness assistance. Capturing this would therefore help inform efforts on prevention. Crisis commissions Heriot-Watt University each year to model the scale of homelessness across Great Britain, using a wide range of sources and including modelling for the number of households in hidden forms of homelessness such as sofa surfing.<sup>2</sup> To accurately identify and understand the scale of the issue with regards to homelessness, it will be important for Government to develop a way of robustly capturing this which is not resource intensive for statutory and non-statutory services to collect and making this data accessible.

Further, current homelessness data also poorly reflects some groups of people at highest risk of homelessness and rough sleeping, and in particular there is a lack of understanding of the scale of homelessness amongst people with a no recourse to public funds condition attached to their immigration status.

The most robust and comprehensive monitoring data for rough sleeping in the UK are the statistics collected routinely by the Combined Homelessness And Information Network (CHAIN) system which is limited to London. This database is able to collect 'flows' of people sleeping rough rather than snapshot annual counts. It collects much more extensive data in comparison to annual counts, including about support needs; reason for homelessness; if people have previously been placed in

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<sup>1</sup> National Audit Office (2024) The effectiveness of government in tackling homelessness.

<https://www.nao.org.uk/reports/the-effectiveness-of-government-in-tackling-homelessness/>

<sup>2</sup> Fitzpatrick, S., Bramley, G., McMordie, L., Pawson, H., Watts-Cobbe, B., Young, G., (2023) The Homelessness Monitor: England 2023. London: Crisis.

## Written evidence submitted by Crisis (TH0015)

homelessness services (e.g. emergency accommodation and longer term supported housing), and if people have experienced rough sleeping before.

Although the CHAIN database is the most comprehensive dataset on rough sleeping, it does not routinely align with statutory dataset or evidence regarding people who are not recorded by public services and so it does not show whether someone has approached his or her local authority for assistance before experiencing rough sleeping or wider forms of hidden homelessness. Non-commissioned services have limited access to the database, leading to some criticism that those who are more hidden (e.g. women), or are ineligible for services (e.g. those with no recourse to public funds), are not always recorded. The database itself was also not designed to be used to inform interventions on homelessness and rough sleeping, and therefore it is not easily or accurately able to be used for this purpose which would be the most useful way for Government to use the data, beyond just better understanding of the extent of rough sleeping.

Crisis is trialling a number of data-driven approaches, learning from the 'Built for Zero' approach started in the US. Built for Zero is a community-based approach to ending homelessness in a local area. It is reliant on regular, timely data collected from the community. The information communities gather is shared between the organisations in what's called a "by-name" list. This means records are related to an individual person and give a fuller picture of their situation and needs in real-time. Communities review people and their specific needs. They also use "by-name" information to find common patterns that appear in the community. This helps to show where there are bigger changes that need to happen.

Crisis is part of the Built for Zero community in Brent and we are recording more people sleeping rough in Brent than CHAIN. This is due to more agencies being involved (i.e. not just commissioned services) plus the Built for Zero methodology of focusing on a cohort and looking for solutions for that person. Beyond Brent, we are also working in Calderdale to look at how we use the data to reduce temporary accommodation use for the council, and so are applying this approach to families and individuals in temporary accommodation.

There are a two key differences in the way we collect and record data compared to CHAIN data:

- We have more services involved adding to our by name list which means that we're pulling from a wider pool of information. One of our key indicators of quality data is that we are relatively confident that we are recording 90-100% of people sleeping rough in Brent. To reach this (and continue to reach this) the community sense-checks our figures against other community knowledge. For example, Brent spoke with a charity which supported people with no recourse to public funds who were able to add people onto the list previously unknown by outreach services.
- Brent community decided to create a definition of rough sleeping that was informed by the women's rough sleeping census to make it more gender informed. This means they are much less reliant on seeing people "bedded down", instead able to rely on other services' intel to confirm someone is sleeping rough (e.g. shelters / charities).

This combination of taking information from a wider sphere (including services like health), combined with a more gender informed, inclusive definition of rough sleeping has meant that we're not only able to record more people rough sleeping, but follow their journey through systems more accurately. This then enables us to identify what system level barriers are preventing people from being moved on.

This is seen in the data, with 459 people being identified via CHAIN rough sleeping in Brent from October 2023-June 2024, compared to 616 people being added to the 'by name list' across the same time frame, a 24% increase.

## Written evidence submitted by Crisis (TH0015)

We hope to be able to work with Government to adopt similar innovative approaches to data to inform its homelessness strategy development.

### Understanding the costs of homelessness

There is also increasing understanding of the costs of homelessness, and most starkly in recent years where local authorities have demonstrated the implications of the cost of temporary accommodation, and the freezing of the temporary accommodation subsidy, on their budgets. Similarly, data is available on the costs of homelessness in some related areas – for example the cost of A&E, with people who are homeless being six times more often than the general population to use A&E services – but data is poorly integrated and shared, meaning an overall picture of the costs of homelessness is not available. Pathway, a homeless health organisation that Crisis works in partnership with, have noted in their evidence submission to this inquiry that poor information sharing between healthcare services results in time and effort being wasted in recollecting information that is already in the system, and states that improving data sharing between services would improve cost-efficiency in healthcare and result in better outcomes. They have also commissioned a cost benefit analysis with Alma Economics of the benefits of providing intermediate care provision for people who are discharged from hospital so that people are no longer discharged into rough sleeping and homelessness.

The Government has an opportunity in its upcoming cross-departmental strategy to dig into the issue of data and costs of homelessness more effectively and look at how money is spent in the system which is better linked to an outcomes framework and the most effective interventions in reducing homelessness and ensuring it is rare, brief and non-recurrent. We believe it would be worth Government exploring ways to capture this across Departments to evidence the impact of interventions to the Treasury ahead of the Spending Review. Approaches such as Built for Zero can also help build this evidence base at a local level and track people's journeys through homelessness.

Additionally, there should also be a consideration of the links between housing and homelessness. In areas where housing costs are highest, there are incentives that lead to a focus on profit making given the mismatch in supply and demand, and this often worsens the crisis for people facing homelessness. For example, there has been a disproportionate rise in nightly paid, privately managed accommodation increasing from six per cent of the total bill to 30 per cent over the last ten years. These are self-contained units which can include hotels and are rented on a short-term nightly basis. In the last four years spend on this type of temporary accommodation has seen nearly a five fold increase from £128 million to £635 million across England. When added to B&B costs this represents over 60 per cent of temporary accommodation spend in the last 12 months.<sup>3</sup>

A recent London Assembly inquiry into London's temporary accommodation emergency highlighted that some temporary accommodation providers are converting from long term lets to a nightly let basis because it is deemed more profitable.<sup>4</sup> There is a huge risk that rising demand will further skew how accommodation is procured in the short term unless the whole temporary accommodation model is looked at and the relationship it has to wider housing market.

Crisis is therefore asking for Government to bring together the work of the homelessness strategy with the work on the long-term housing plan, so that such issues are not looked at in isolation. It will

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<sup>3</sup> 2024 UK Housing Review Autumn Briefing paper p 14. <https://www.cih.org/media/ox2gxc55/ukhr-autumn-briefing-2024.pdf>

<sup>4</sup> London Assembly 2024 <https://www.london.gov.uk/who-we-are/what-london-assembly-does/london-assembly-work/london-assembly-publications/londons-temporary-accommodation-emergency>

## Written evidence submitted by Crisis (TH0015)

also be critical that the long-term housing plan considers homelessness and responds to local homelessness need, and therefore is also measured on reducing levels of homelessness by increasing the number of people who are homeless being able to access a settled home.

### Delivery of system leadership on homelessness by the Department

#### Summary of key points:

- Crisis has welcomed previous efforts from Westminster Government to tackle rough sleeping but has long advocated for a broader response that considers tackling all forms of homelessness. We have found a narrow focus on rough sleeping has meant key drivers of homelessness – such the adequacy and elements of design of the welfare system and the lack of genuinely affordable homes – have not been tackled or considered in a truly cross-departmental effort. We therefore welcome the shift from the current Government to create a strategy focused on homelessness and rough sleeping.
- Crisis is also asking that to guide the direction of the homelessness strategy, there is a clear vision set out by the Government on what they wish to achieve on homelessness in this Parliamentary term and beyond. A unifying vision underpinned by an outcomes framework will be vital to bringing together different stakeholders to work towards clear outcomes and setting clear targets for departments across Government on this issue.
- Based on a body of evidence from both our frontline services, working with people with lived experience and national and international research, we are calling for the strategy to be underpinned by a clear set of principles and for it to set out a long-term vision to achieve how we move to a response to homelessness that provides access to settled housing as quickly as possible; ensures people have the support they need to keep their home and move out of homelessness as quickly as possible; and prevents homelessness from happening in the first place.
- The strategy should also be backed by the Prime Minister, and we are asking that the Inter-Ministerial Group on homelessness is chaired by Angela Rayner in her capacity as Deputy Prime Minister to help ensure the right level of buy-in and momentum across Departments. The development of the homelessness strategy would also benefit from being part of the work of the mission boards, to help ensure senior level backing. In previous efforts on homelessness, the work being led by a Minister in one Department has not been an effective structure to foster true cross-departmental working.

Previous efforts to draw together departments from across Government to tackle rough sleeping in England have been welcome, and funding decisions to support this work has also helped create some new ways of working and success in supporting some people away from the streets.

However, Crisis has always urged Westminster Government to take a broader approach to the issue and consider all forms of homelessness – particularly given the growing crisis of families and children in temporary accommodation and the fact that often, people sleeping rough have experienced other forms of homelessness previously and may well have had interaction with Government institutions before sleeping rough. Therefore an approach that focuses on all forms of homelessness would also mean preventing homelessness and rough sleeping before it occurs, and seek to shift the current response approach away from a crisis response.

We are therefore pleased that the new Westminster Government's strategy on homelessness will seek to tackle all forms, and our understanding is it will also be connected to the work of the Child

## Written evidence submitted by Crisis (TH0015)

Poverty Unit, where there will be obvious overlaps with regards to cross-cutting policy issues and particularly on housing and welfare.

Crisis is also asking that to guide the direction of the homelessness strategy, there is a clear vision set out by the Government based on clear principles that informs what they wish to achieve on homelessness in both this Parliamentary term and over a decade of national renewal, as set out in other policy areas by the Government. We are asking that the Government ensure the strategy is underpinned by the following principles: that it covers all forms of homelessness; is housing-led and backed by additional housing supply; led by lived experience; evidence-based; inclusive (no one is turned away); and prevention first.

Based on a body of evidence from both our frontline services, working with people with lived experience and national and international research, we believe the strategy should set out a long-term vision to achieve how we move to a response to homelessness that provides access to settled housing as quickly as possible (i.e. being housing-led); ensures people have the support they need to keep their home and move out of homelessness as quickly as possible; and prevents homelessness from happening in the first place. Setting out these clear themes of the strategy, underpinned by an outcomes framework, would help Government focus on the most effective interventions across a broad range of areas to success in tackling homelessness.<sup>5</sup>

In our experience working with the Scottish and Welsh Governments on their action plans on homelessness, a unifying vision underpinned by an outcomes framework helps bring together different stakeholders to work towards clear outcomes. An outcomes framework will make clear how the Government intends to meet the vision set out in its cross-Government strategy and how progress will be measured, including by setting targets for relevant departments on this issue.

In Scotland an outcomes framework has been developed for their Ending Homelessness Together action plan,<sup>6</sup> and in Wales the Government has consulted on an outcomes framework to achieve their plan to end homelessness. We believe a similar approach could help inform the work of the Inter-Ministerial group on homelessness. We also note that this approach is echoed in a 2023 National Audit Office report on cross-government working, which states that learnings from cross-government initiatives in civil service show that “departments need strong leadership, a common purpose and shared vision to maximise buy-in and support for cross-government working”.<sup>7</sup>

Another aspect of leadership that has been drawn out in both the National Audit Office’s report, and the Institute for Government, and which chimes with our experiences of working with Government’s across Britain on homelessness is the need for oversight and backing at the highest level of Government to drive forward focus on cross-cutting issues such as homelessness. We previously found that due to often competing and urgent demands on Government, having work on homelessness led by a Minister in DLUHC did not foster true cross-departmental working to tackle bigger policy issues over the long-term that would have a significant impact on homelessness, and we have also seen recent examples of policy and practice changes that have actively undermined the work of Government on homelessness.

This is evident in repeated decisions to freeze local housing allowance rates, as highlighted in the National Audit Office response. Another clear example of this was the decision by the Home Office in 2023 to change practice on evictions from Home Office accommodation for people who are granted

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<sup>5</sup> Downie, M. et al (2018) Everybody In: How to end homelessness in Great Britain. London: Crisis.

<sup>6</sup> <https://homelessnetwork.scot/the-ending-homelessness-together-monitor/>

<sup>7</sup> National Audit Office (2023) Cross-government working: lessons learned. <https://www.nao.org.uk/insights/cross-government-working-lessons-learned/>

## Written evidence submitted by Crisis (TH0015)

asylum. Up until August of last year, common practice had been for people to be required to leave around 28 days after being granted status, but a decision was made to instead issue eviction notices at the legal limit of 7 days. This resulted in a significant increase in people granted status being evicted from their Home Office accommodation without the correct documentation and support to be able to actually begin their lives, including finding work, renting or applying for financial support from benefits, meaning many had no choice but to sleep rough and seek homelessness assistance.

We saw the impact of this in our frontline services and particularly across London. From July 2023 to July 2024, 3,709 people approached one of our three London Skylights for the first time. 52% (1,929) were sleeping rough when they first came to us for support. Over the same period, 1,661 people received intensive 1-1 support from one of our lead workers. 40% (675) of these were people with refugee status. Many will have come to us immediately upon having been evicted from asylum accommodation with nowhere to go.

This issue of disjointed and inefficient working across public services in relation to homelessness has also been highlighted by our partners Pathway, a homeless health charity, in relation to health where they note that different services often pass responsibility between them, with people falling through the cracks. While pressures on public services is undoubtedly a factor in this, they emphasise it is also due to a lack of systemic incentives to work collaboratively to address people's homelessness and improving system collaboration would represent a more efficient way to address homelessness, including on prevention. A result of this current way of working is also seen in people being discharged from hospital onto the streets, an urgent issue Pathway is campaigning on.

These systemic failures would be mitigated against with a clear vision and outcomes framework with targets across departments, but also with more senior leadership of the issue of homelessness. It is encouraging the work of the Inter-Ministerial Group is being overseen by the Secretary of State for Housing, Communities and Local Government, but we would ask that minimum the work of the Inter-Ministerial Group is overseen by the Deputy Prime Minister, and that it also feeds into the work of the mission boards, so that it ultimately has oversight by the Prime Minister. A clear example of success with regards to homelessness in recent years is the work of the previous Labour Government's Rough Sleeping Unit. The Institute for Government identifies the fact that then Prime Minister Tony Blair commissioned the Rough Sleeping Unit and was overseeing its work as a significant reason for its success.<sup>8</sup>

With more senior level oversight of homelessness, and connection to the mission boards, we also believe this would help to ensure the work via the homelessness strategy is integrated with other related pieces of work on both the Child Poverty Unit and the long-term housing strategy. We strongly advocate for rapid access to a safe, secure and affordable home as being a core aspect of being able to end homelessness and prevent it from happening in the first place (known as a housing-led response to homelessness). It is therefore integral that the Government's efforts on housing, and particularly the very welcome effort to deliver the biggest generation in affordable and social housing, is integrated with efforts on homelessness to ensure people in the most need can access social housing. The deliberate effort needed to link these two areas of policy is a learning from the work Crisis is overseeing in Wales as part of the Ending Homelessness National Advisory Board. There is now a task and finish group focused on aligning local homelessness need with planning for social housing investment, to ensure the delivery of new social homes does lead to a decrease in homelessness.

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<sup>8</sup> <https://www.instituteforgovernment.org.uk/comment/angela-rayner-homelessness-unit>

## Written evidence submitted by Crisis (TH0015)

### The response and support for local authorities

As all forms of homelessness have risen in recent years, local authorities have been placed under increasing pressure to respond to this increase in demand with limited resources. While they have been faced with cuts to their own budgets, wider cuts to local housing allowance rates and discretionary housing payments has also hampered their ability to support people out of homelessness. One of the main budgetary pressures we are also seeing impact local authorities ability to respond to homelessness is the freezing the temporary accommodation subsidy, which is currently set to 90% of local housing allowance levels from 2011. In areas where homelessness is highest, this is placing huge financial pressures on local authorities, and they have shared with us this is also impacting their ability to do prevention work as so many are focused on having to respond to at the point of crisis. The financial pressure of a lack of temporary accommodation subsidy has not been addressed by successive Governments, though we are aware it is frequently raised by civil servants.

The recent budget from the Government has offered financial support to local authorities on a range of issues which we hope will ease overall financial pressures and targeted support in much needed areas such as SEND, but gaps remain on homelessness. With future plans to refreeze local housing allowance rates, keep the level of the benefit cap, retain the current temporary accommodation subsidy level, and maintain but not increase investment in discretionary housing payments, we are concerned that the intent from Government to 'get the country back on track to ending homelessness' will not be achievable with the policy and funding decisions in these areas, and the limited housing options in many places currently will continue as it will take time to deliver the social housing needed. We are concerned this will continue to result in out of borough placements which we are seeing in some parts of the country where homelessness pressures are high, and which often mean people are uprooted from their communities and networks.

Further, while local authorities are contending with an array of issues, we are also aware that many of the people we are supporting are struggling to access face-to-face assessments, and there has been a significant shift since the covid-19 pandemic for our frontline staff spending significant amounts of time trying to get through to local authority housing options team on the phone. This is resulting in people failing to get help when they need it and sometimes forced to sleep rough and we try to get them access to the support they are entitled to. We are asking Government to instruct local authorities to return to face-to-face assessments for homelessness so that people can be supported as quickly as possible.

**November 2024**