

Written evidence submitted by the Local Government Association [IOC 165]

1. About the Local Government Association

- 1.1. The Local Government Association (LGA) is the national voice of local government. We are a politically-led, cross party membership organisation, representing councils from England and Wales.
- 1.2. Our role is to support, promote and improve local government, and raise national awareness of the work of councils. Our ultimate ambition is to support councils to deliver local solutions to national problems

2. Summary

- 2.1 Councils have a statutory duty to support people who present as homeless or are at risk of homelessness. They have been working hard beyond the remit of these duties to urgently move people who are sleeping rough away from the streets and into suitable accommodation to help protect them from the coronavirus.
- 2.2 Councils – including through commissioned services – are providing people with accommodation, support services including for substance dependency and mental health, and additional support such as food, transport (where needed), supporting with claiming benefits, and personal items. Councils are also facing increased costs from staffing due to new working arrangements and increased sickness. This combination of higher demand, exceptional costs, and wider shocks to councils' income streams, is having a significant effect on councils' financial reserves and funding for homelessness services should be increased.
- 2.3 Councils have welcomed the £3.2 million worth of additional funding to support rough sleepers, as well as the £3.2 billion to help councils through this period. However, they need a commitment that the extraordinary costs incurred by all services to date – as well as the costs from delivering “business as usual” services with reduced income flows – will be met. Without this, the sustainability of a range of council services, including homelessness, will be jeopardised in the short and medium-term.
- 2.4 Councils are seeing continued flows into homelessness and rough sleeping, creating an urgent need for more temporary accommodation. This is likely to increase as the social distancing measures continue. This is due to increased incidences of domestic abuse and family breakdown, and discharge from hospital and prison services. We are asking the Government to continue to support councils to identify and procure accommodation for placing people experiencing homelessness.
- 2.5 We are asking the Ministry of Housing, Communities and Local Government (MHCLG) for guidance on how councils should be delivering their duties under the Homelessness Reduction Act. This includes guidance on how to conduct assessments and fulfil administrative requirements. Limited guidance for councils from national government means that homelessness teams are uncertain about how to deliver their duties under the Act in the context of

extraordinary service pressures.

2.6 Councils are reporting issues when accommodating large numbers of homeless people in such a short space of time, including a lack of clarity on personal protective equipment (PPE) and limited resource being allocated by the NHS towards supporting safe accommodation placements. We are asking the Government to urgently release planned formal guidance to give all partners clarity on their roles and responsibilities in housing people who are homeless.

2.7 Councils are currently accommodating significant numbers of people on an emergency basis, many of whom might not meet the criteria for statutory homelessness support. We are concerned that there is a longer-term risk arising from the lack of clarity around a national-level 'exit strategy' for the large numbers of people who have been accommodated on an emergency basis. It is important that the Government works with councils and other agencies to support people currently in emergency accommodation to move into safe housing with appropriate support after the current measures have been lifted.

2.8 In the longer term, successfully addressing the worst forms of homelessness requires appropriate, settled accommodation, as a foundation for a stable and thriving life. Councils have a key role to play in this and are ambitious to do more. Local government has raised concerns about a number of income and cost pressures resulting from Covid-19, which may affect the future financial sustainability of Housing Revenue Accounts.

2.9 In particular, a number of councils have raised concerns about the requirement to return Right to Buy receipts to the Government if they are not spent within three years, given that many development sites have now closed. It is vital that the Government urgently brings forward the proposals consulted on in 2018 and extends the spend period from three to at least five years, to ensure the replacement of homes sold under the Right to Buy scheme.

3. How effective has the support provided by MHCLG and other Government departments in addressing the impact of COVID-19 on those in the private rented sector, rough sleepers, and the homeless?

3.1 Councils have a statutory duty to support people who present as homeless or at risk of homelessness. Alongside this, councils play a key role in coordinating and providing support for people experiencing homelessness. This work has increased in urgency and scale since the pandemic, and includes providing people with accommodation, support services including for substance dependency, and additional support such as food, transport (where needed), supporting with claiming benefits, and personal items.

3.2 The support of national government departments is of course crucial in enabling councils to mitigate the impacts of COVID-19 on people at risk of or experiencing homelessness. This is both in terms of health and financial hardship.

3.3 Protecting private renters

3.3.1 Government interventions to protect people living in the private rented sector have been welcomed by councils. These include an uplift in local housing allowance (LHA) rates to cover the lowest third of market rents, and a delay in evictions.

3.3.2 The impact of COVID-19 on private renters has been severe. Recent research

from Shelter suggests that one in four renters have already seen their income fall, and 1.7 million expect to lose their jobs over the next three months. ⁱ

- 3.3.3 Against this context, councils have expressed concerns that the Government's ban on evictions – which adds an additional month's notice to existing eviction periods – does not go far enough to prevent a sudden increase in homelessness in three months as a result of accumulated rent arrears.
- 3.3.4 We are concerned that if LHA rates subsequently revert back to previous levels, renters in the Private Rented Sector (PRS) may be unable to meet rental costs. We are calling for the uplift in LHA rates to remain in place in the longer-term, to protect private renters against eviction due to financial hardship.
- 3.3.5 Local housing Allowance rates have been increased for households claiming support. They have not, however, been increased for councils making homelessness placements, which is further limiting their ability to claim back the costs of accommodation and meet the exceptional costs arising as a result of COVID-19. We are therefore asking the government to ensure that the increase in LHA rates is applied to placements made by councils.

3.4 Protecting people experiencing acute homelessness

- 3.4.1 On 26 March 2020, Minister for Rough Sleeping and Housing, Luke Hall MP wrote to local authorities to ask them to ensure that people sleeping rough or in high-risk, dormitory-style accommodation were supported into more appropriate accommodation by 29 March. This request came at a time when councils were struggling to find sufficient temporary and emergency accommodation following government advice which led to the mass closure of hotels, bed and breakfasts, and caravan parks.
- 3.4.2 According to MHCLG data, councils have now accommodated the vast majority of people sleeping rough or in high-risk accommodation. The Government supported this by liaising with hotels, providing a centralised booking system for local authorities, and reversing its initial guidance on closing hotels, bed and breakfasts, and caravan parks.
- 3.4.3 Babergh District Council and local businesses worked to refurbish a building to provide urgent accommodation to people at risk during the Covid-19 outbreak.ⁱⁱ The building, which had only recently been returned to the council, will house people who are sleeping rough or at risk of homelessness and need somewhere safe to self-isolate.
- 3.4.4 Manchester City Council and Liverpool City Council secured agreements with local hotels to provide rooms for rough sleepers and people in shared accommodation during the outbreak. The individuals will continue to be provided with food and welfare support.ⁱⁱⁱ
- 3.4.5 Accommodating large numbers of homeless people in a short space of time requires a joint approach from councils, the NHS and local partners to ensure that placements are made in a way that decreases public health risks. In this instance, enabling self-isolation and separating people who need shielding from those who are displaying Covid-19 symptoms requires specific resource from a range of agencies to enable: separation of accommodation, provision of services, treatment and support, and a clean and clinically appropriate environment.
- 3.4.6 We understand that MHCLG, NHS England (NHSE), Public Health England (PHE), and the Department for Health and Social Care (DHSC) have drafted

detailed guidance on this issue, but have not yet released it. As a result, councils are reporting issues: firstly, a lack of clarity on personal protective equipment (PPE), including where its use is required or appropriate. In addition, a lack of government guidance specifying the requirements for PPE in the homeless sector risks this sector not being included in departmental prioritisation planning. This creates a public health risk, both for people being accommodated and for the workers supporting them.

- 3.4.7 Secondly, NHSE guidance plays a clear role in encouraging local NHS trusts to allocate resource and personnel towards supporting multi-agency responses to accommodating rough sleepers. Without this guidance, councils have reported difficulties in securing this resource from health partners.
- 3.4.8 More broadly, the homeless sector has not been able to access central government guidance on how to reduce the threat of outbreaks or respond to outbreaks. Forthcoming modelling by the UCL Collaborative Centre for Inclusion Health suggests that this could result in up for 12,000 hospital admissions and 900 deaths of homeless people in England without further action.
- 3.4.9 We are asking for the planned government guidance, and associated operational guidance, to be expedited so that the required provisions can be made by all agencies.

3.5 Supporting councils to prevent and manage levels of homelessness

- 3.5.1 Councils have reported increased numbers of people presenting as statutory homeless as a result of financial hardship and associated pressures. This has been characterised as a 'second wave' of homelessness, arising from factors such as family breakdown and domestic abuse, particularly where people are currently 'hidden homeless', for example, in overcrowded accommodation. Moreover, councils are reporting additional flows of people into rough sleeping.
- 3.5.2 Following the initial increase in demand for accommodation, councils are now experiencing an urgent need for more temporary accommodation. Continued restrictions on lettings in the private rented sector in particular have limited the move-on options available to councils to support people who are homeless or at risk of homelessness, which has created a large backlog of households in temporary accommodation.
- 3.5.3 These unprecedented demand pressures have created significant cost pressures for councils, which are simultaneously experiencing reduced income flows. This is having a significant effect on councils' financial reserves.
- 3.5.4 Councils have welcomed the £3.2 billion funding allocated by government to councils, but need a commitment that the extraordinary costs incurred by all services to date – as well as the costs from delivering "business as usual" services with reduced income flows – will be met. Without this, the sustainability of a range of council services, including homelessness, will be jeopardised in the short and medium-term.
- 3.5.5 There is also a continued need for guidance for councils on how to support people within a radically changed operating context. This includes:
- guidance on how councils should be carrying out assessments around emergency housing assistance so that support can be provided to those who need it.
 - guidance on how social housing providers should manage their allocations and

lettings processes, so that people who urgently need housing can continue to access it.

- guidance for police on the role of enforcement powers in supporting people sleeping rough to take up offers of support.

3.5.6 Guidance should also provide urgently-needed clarity to councils on how they are expected to support the large numbers of people who are currently being accommodated on an emergency basis once the lockdown period ends in the forthcoming weeks. This is needed so that councils can effectively plan their local provision.

3.6 People with no recourse to public funds

3.6.1 Councils have seen high numbers of the population with no recourse to public funds (NRPF) facing homelessness and destitution, particularly given restrictions on access to benefits following loss of employment job losses. There has been a significant shift in the expectations on councils to support people with NRPF since the start of the COVID-19 crisis. Councils are statutorily obliged to provide support to families and adults with care and support needs, with no eligibility for support under the statutory homelessness framework. Despite this, councils have made a significant effort to ensure that individuals in acute housing need have been safely accommodated and supported to follow government guidance on shielding, self-isolation and social distancing.

3.6.2 This vital work is made difficult by the NRPF conditions as councils must respond within the parameters of the law and avoid use of prohibited public funds. Support from local welfare funds is also legally unavailable to people with NRPF. Government guidance on public funds or information has not been updated to set out what government assistance schemes can or cannot be accessed by a person who has no recourse to public funds, leading to variance in provision.

3.6.3 Whilst the Home Office has introduced some protections for certain groups of people with NRPF, these have been subject to large demand and thus delay. These also require people to actively make what can be quite complex applications, meet onerous evidential requirements and it will be unclear whether policies are satisfied until Home Office decisions are made.

3.6.4 There has been limited and conflicting information available to councils on whether the £3.2 million emergency fund to support rough sleepers can be used to support people with NRPF. It is also unclear to what extent the Government's Covid-19 emergency funding will adequately meet additional costs. Data on NRPF service provision for 2018/19 - outside the current crisis - shows that unfunded provision cost 59 councils £47.5 million a year.^{iv}

3.6.5 All these create significant funding and reputational challenges for councils. On 8 April, the Local Government Associations across the UK wrote to the home secretary to ask that this is addressed in the following ways:

- The no recourse to public funds condition is universally lifted during the pandemic to facilitate compliance with government public health guidance.
- If the NRPF condition is not relaxed, there needs to be joint work with local government to:

- Provide accessible and clear government information in one place for both councils and their communities which include details of all schemes related to coronavirus and what people can or cannot claim when they have no recourse to public funds
- Adequate funding for local authorities for supporting people with no recourse to public funds when statutory duties are engaged or when this is required on public health grounds
- Remove the local welfare fund from the list of prohibited public funds
- Introduce changes to process including provisions for people whose leave to remain is due to expire, to ensure this can continue to be valid, and amend fee waiver and change of conditions policies to reduce the evidential burden on people.

3.7 Domestic abuse

- 3.7.1 The coronavirus pandemic presents serious risks for victims of domestic abuse. The stay-at-home measures required are likely to have a significant impact on on domestic abuse victims due to increased exposure to those perpetrating the crime.
- 3.7.2 The isolation of families could exacerbate domestic abuse, as perpetrators will be more likely to be at home with the victim, and the traditional routes to help and support such as schools, GPs and workplaces may be closed. There will also be new domestic abuse cases during this period, but isolation will mean there are less opportunities to identify the early warning signs of abuse as they emerge.
- 3.7.3 We know that other countries that are also dealing with the Covid-19 pandemic have reported an increase in domestic abuse cases. Sadly, this has been borne out in the UK too, with the UK National Domestic Abuse Helpline reporting a 25 per cent uplift in people calling the helpline since lockdown measures began.
- 3.7.4 Domestic abuse victims are likely to face restricted access to support or escape as a result of the lockdown measures. It may even curtail measures that perpetrators may take to keep their own abusive behaviour under control. Some domestic abuse victims may feel it is not safe to reach out for support, as the stay at home policy means there are fewer opportunities to speak to someone when victims are alongside the perpetrator in the home.
- 3.7.5 There will be risks associated with calling helplines when the perpetrator is able to hear the domestic abuse victim's conversation. These concerns around safety are demonstrated by the fact that alongside the uplift in calls to the helpline, domestic abuse services have seen a significant uplift in the use of their online services and web forum support services. For example, Women's Aid's Live Chat service has seen a 41 per cent increase since 16 March 2020 when the self-isolation measures came into place^v. There have also been reported increases in calls to helplines late in the evening.
- 3.7.6 There will be an impact on refuges and emergency accommodation, due to those having to self-isolate if they are presenting symptoms. Government guidance has been provided to help refuges continue to remain open for domestic abuse victims, but there remain questions about how to manage self-isolation safely in communal accommodation. The sector has highlighted the need for additional financial support, guidance on accepting new referrals and managing move-on, and safety measures such as access to testing and PPE.

- 3.7.7 It is important to highlight that domestic abuse is a hidden crime, so the uplift in calls to the national helpline or the police will only be part of the picture. Domestic abuse victims will often not disclose their experiences of abuse to the police, and will choose to turn to friends, family or colleagues. They may feel it is more difficult to reach out to these support networks during the COVID-19 pandemic, so there may be a significant number of disclosures not being made.
- 3.7.8 We are calling on government to ensure councils have enough long-term funding to support victims of domestic abuse, particularly to meet a predicted bottleneck in demand for help once COVID-19 restrictions are lifted. It is also important that government works more closely with the accommodation providers to house victims safely where in-demand refuges are full.

3.8 Alleviating hardship

- 3.8.1 Alleviating and preventing financial hardship is a key aspect of preventing future homelessness. We have welcomed government interventions, including the announcement of a £500 million hardship fund, and wider measures to prevent economic hardship.
- 3.8.2 There are still issues that need to be dealt with urgently. In relation to the hardship fund, councils have expressed concerns about the sufficiency of the funding in terms of providing deductions to increased numbers of new local council tax support claims throughout the year, and in terms of providing additional discretionary support.
- 3.8.3 In particular, councils are concerned that the restrictions on the hardship fund – which has been designed to enable access to council tax discounts for people eligible for local council tax support - exclude low-income working households who do not qualify for benefits from support.
- 3.8.4 The Government had initially detailed plans for an additional, discretionary component, to be made available to support people facing financial hardship who would not qualify for local council tax support. However, there is a lack of clarity around when this component will be made available.
- 3.8.5 Almost all councils retain a non-statutory local welfare scheme, which now more than ever is playing a key role in supporting economically vulnerable households. For example, Southwark Council made temporary changes to the Southwark Emergency Support Scheme so that people requiring urgent support can apply.^{vi} Anyone who has experienced a sudden loss or reduction in income and cannot meet their household's basic needs is eligible to apply. The council has injected an additional £1.5 million into the scheme's budget to meet likely demand.
- 3.8.6 In the absence of additional discretionary funding, this work continues to be unfunded, which means that not all councils are able to provide local welfare support to this extent. This creates a risk of growing numbers of households being placed in a financially precarious position, with implications for future levels of homelessness.

3.9 Ensuring access to food

- 3.9.1 A particularly important element of local hardship support is ensuring access to food for people experiencing food poverty. This issue is particularly urgent for people experiencing serious financial hardship and destitution, including acute forms of homelessness.

- 3.9.2 The national government response has been particularly focused on ensuring access to food for the medically vulnerable, or 'shielded' cohort of individuals. However, there is a much larger cohort of vulnerable individuals who, while not at increased risk of severe illness, are at risk due to the restrictions that have been put in place through, for example, being homeless.
- 3.9.3 Councils are responsible for identifying, contacting and supporting those in this cohort, and have developed schemes to provide food to vulnerable people who are not able to pay for food, as well as people who are able to pay but unable to access food.
- 3.9.4 For example, the Royal Borough of Greenwich, in partnership with Greenwich Cooperative Development Agency and Charlton Athletic Community Trust, has established a response pathway to meet the needs of households outside the remit of the Government shielding programme, including: people who are financially secure but cannot shop, people who are financially insecure and cannot shop, and people who are financially insecure and can shop. Within two weeks, this scheme has delivered 200 food boxes that meet COVID-19 safety as well as nutritional guidelines, for vulnerable non-shielding residents in Greenwich.^{vii}
- 3.9.5 It's vital that these local schemes are adequately supported through local welfare funding, to enable councils to directly provide food to people who are unable to leave their accommodation. This is a fast, scalable response compared to a heavy reliance on food banks, which have already seen a significant increase in demand in recent weeks.
- 3.9.6 A recent briefing from the Greenwich Cooperative Development Agency and Sustain: the Alliance for better farming, suggests that all of the main food aid and poverty groups across the UK – including food banks - are reporting severe difficulties in accessing sufficient free food to meet existing need alongside rapidly increasing demand.^{viii}
- 3.9.7 Measures are also needed to address the risk of food poverty for economically vulnerable individuals, to support people to access food without recourse to strained charitable, local authority, and local resilience forum resources. In particular, the Government should ensure additional support for individuals through the mainstream benefits system, and ensure that councils' local welfare schemes are sufficiently resourced to provide support around financial hardship more broadly.

4 What problems remain a current and immediate concern for these groups?

4.1 Accommodating people at risk

- 4.1.1 Councils have made a monumental effort to ensure that vulnerable households are safely accommodated during the crisis. As detailed in the previous answer, they are continuing to face intense pressure, including from people presenting as newly homeless during the lockdown, and from people currently living in unsafe shared facilities who need support to self-isolate.
- 4.1.2 The public health impetus to ensure that people do not enter chronic forms of homelessness remains. Councils therefore need support from national government to ensure that they can continue to safely accommodate people, including:
- Continued support to encourage hotels and other accommodation providers to open for local authority bookings.

- A commitment that the extra costs local authorities are facing due to the additional demands created by COVID-19 - as well as delivering 'business as usual' services with reduced income flows - will be met.
- Clear and consistent communications from government departments about which funding streams are available to meet accommodation needs (including and especially for individuals with no recourse to public funds).

4.1.3 In addition, the concerns around lack of guidance and access to food, as detailed in the previous section, still remain.

5 What might be the immediate post-lockdown impacts for these groups, and what action is needed to help with these?

5.1 Exit pathways for people currently in emergency accommodation

5.1.1 Councils are currently accommodating significant numbers of people on an emergency basis, many of whom might not meet the criteria for statutory homelessness support. There is an urgent need for clarity on the expectations on councils to support this cohort of people in the medium-term, and – more broadly – for the Government to support councils to ensure that there are exit pathways in place so that people currently in safe accommodation do not return to the streets. Our recommendations for support have been outlined below.

5.2 Impacts of economic hardship on private renters

5.2.1 Significantly more people are experiencing financial hardship now than at the beginning of the Covid-19 crisis. For example, the Department for Work and Pensions (DWP) has seen a tenfold increase in the number of people seeking to claim universal credit.

5.2.2 For many, the threat of homelessness has been delayed by the temporary ban on evictions. However, once this ban is lifted, there is a significant risk that councils will experience an immediate surge in people presenting as statutory homeless due to eviction.

5.2.3 In the longer-term, the UK faces a significant economic crisis. Already, there are gaps in support for individuals and some businesses including those who are newly self-employed and cannot access the self-employed income support scheme. Seasonal workers for tourism and cultural businesses who were not on the payroll at the cut-off date are similarly unsupported.

5.2.4 Additionally, support is needed for businesses that are in shared office space or in council or privately-owned business parks, where businesses are not individually rated and where business rates are rolled into rent payments. Evidence from just one council, Plymouth, shows that there are 400 of these businesses in that area, accounting for over 3000 employees.

5.2.5 A sustained focus on the economic recovery, alongside immediate financial support, will be key in ensuring that levels of homelessness as a result of economic vulnerability do not increase in the longer-term.

5.3 Impact of reduced service capacity

5.3.1 Covid-19 has seen councils face significant cost pressures as well as the loss of income and liquidity issues. As a result, homelessness services – along with a range of other council services - face the risk of reduced capacity in terms of

their ability to prevent or reduce homelessness. Combined with increases in demand for services, this could have an impact on levels of homelessness stretching into the longer-term.

5.3.2 All councils are experiencing these significant issues and we are working with national government and councils to monitor and address needs as they arise.

5.3.3 We are working closely with Chief Finance Officers and MHCLG to assess councils' financial need, including service delivery needs, cash flow challenges, impacts on income (including fees and charges and commercial income) and inability to deliver planned savings in key service areas. The additional £1.6 billion funding announced on 18 April (taking the total package to £3.2 billion) and cash flow measures have been welcome and provide additional certainty over the short term.

5.4 The following actions are needed to help mitigate these impacts:

5.4.1 In the short-term:

5.4.1.1 The Government should urgently outline a clear strategy for how they will support people currently being accommodated on an emergency basis to move into safe housing with appropriate support after the current measures have been lifted. This should include clarity on the position of individuals with no recourse to public funds.

5.4.1.2 This strategy should be underpinned by sufficient funding for council services, and – where needed – practical support from government to identify sources of accommodation.

5.4.2 In the medium-term:

5.4.2.1 We need government to ensure there is improved support for economically vulnerable individuals through the mainstream benefits system.

5.4.2.2 The LGA has long-called for an uplift in local housing allowance (LHA) rates. The current uplift should remain in place beyond the lockdown period, to ensure that LHA rates cover the cost of rents, and so that homelessness can be more easily prevented and relieved.

5.4.3 Measures to improve the supply of affordable housing

5.4.3.1 Successfully addressing the worst forms of homelessness requires appropriate, settled accommodation, as a foundation for a stable and thriving life. Particularly in the context of significant homelessness pressures, social housing should be treated as an important national investment and seen as a desirable long-term option for a home.

5.4.3.2 Councils have a key role to play in this and are ambitious to do more. The last time we built at least 250,000 homes a year, councils delivered more than 40 per cent of them. Lifting the housing borrowing cap at the end of 2018 was a huge step forward in enabling councils to once again resume their role as major builders of affordable homes. Analysis prior to the Covid-19 outbreak^{ix} showed that councils across the country are planning to build 77,488 homes in the next five years, whilst another suggested that the Government's estimate that the abolition of the cap would enable stock-owning councils to deliver up to 10,000 homes per year is likely to be met – and even exceeded. ^x

5.4.3.3 Councils have raised concerns about a number of income and cost pressures resulting from Covid-19, which may affect the future financial sustainability of

Housing Revenue Accounts, including increased levels of rent and service charge arrears, void losses and loss of development income. There is a risk that these will have an impact on both councils ability to deliver their responsibilities as local housing authorities as well as their housing delivery plans. This is in addition to other increased costs as a result of building safety reforms, as well those arising from a potential revised Decent Homes Standard, and the proposed Future Homes Standard.

5.4.3.4 In particular, a number of councils have raised concerns about the requirement to return Right to Buy receipts to the government if they are not spent within three years, given that many development sites have now closed. It is vital that the Government urgently brings forward the proposals consulted on in 2018 and extends the spend period from three to at least five years, to ensure the replacement of homes sold under the Right to Buy scheme.

5.4.3.5 Councils also need a range of wider reforms so they can play their role in delivering the homes that communities need, including those for affordable and social rent. These include urgent reform of the right to buy scheme to enable the delivery of new homes. This includes allowing councils to retain all sales receipts, set discounts locally, vary the maximum amount of retained receipt that can be used to build a replacement home and combine receipts with other government grant funding.

5.4.3.6 It is also important that new government initiatives do not have the unintended consequence of reducing the general provision of social and affordable rented homes. For example, government proposals for First Homes (defined as homes for sale at a minimum of 30% discount for local first-time buyers) could make a valuable contribution to the mix of housing options, but local planning authorities must maintain the levers to deliver them alongside other housing products in a way that addresses housing need identified locally as part of the planning process. This will ensure that councils can ensure the right mix of homes – to rent and buy – are available and affordable to people that need them.

5.4.3.7 Recent Homes England data shows that only 4 per cent, or 3,583 of the 90,323 of the homes funded by the government's current £4.7bn Shared Ownership and Affordable Homes Programme (SOAHP) since 2016 were for social rent. The data also shows that 47,047 (52 per cent) of the homes funded were for affordable rent, while 39,693 (44 per cent) were for affordable homeownership, the majority of which were for shared ownership.^{xi}

5.4.3.8 With more than one million households on council waiting lists, and now more than 86,000 households in temporary accommodation, it is vital that a future Affordable Housing Programme is re-focused towards support for social and affordable rented homes.

5.4.4 Cross-departmental work to implement wrap-around support

5.4.4.1 Effectively addressing homelessness requires a multi-disciplinary approach, with contributions from multiple agencies. This in turn requires a commitment from all relevant government departments to support their agencies to tackle homelessness.

5.4.4.2 The current crisis has highlighted the capabilities of local networks, and provided a significant base of learning about what works well to support vulnerable individuals. This opportunity should be built on with a programme of focused, cross-departmental work, so that the Government's target of ending rough sleeping by 2024 can be achieved.

5.4.4.3 In advance of the Government's 2018 rough sleeping strategy, the LGA chaired a cross-sector Prevention Task and Finish group. This group submitted recommendations to the Rough Sleeping Strategy on strategic and operational steps which key government departments could take to support effective multi-agency working in a long-term, resilient way. These recommendations remain relevant in the current context, and have been attached to this submission as an appendix.

Appendix

Preventing rough sleeping Recommendations from the Prevention Task and Finish Group – 27.04.18

Introduction

In life, every one of us needs good health, a stable home, a job, and a support network of friends and family; they are fundamental to being fulfilled, happy and productive.

The rise of rough sleeping is a very visual demonstration of the challenges that society and the economy has faced in helping everyone achieve those fundamentals.

But rough sleeping is at the acute end of a broad spectrum of homelessness, which, at the other end, includes households in accommodation experiencing challenges that are causing housing stress for the first time.

And people's lives are complex, many households face many barriers. Success by one agency might be undone by an absence of support from another, and so missing an opportunity to prevent someone's journey towards the streets.

Prevention of rough sleeping is therefore everything, it is everyone's business, and it requires collective and coherent action.

What we mean by prevention

There is a great deal of evidence of what constitutes good quality prevention, and very many brilliant people and initiatives succeeding in prevention every day.

For the purposes of this paper and the recommendations it makes, we have adopted an approach akin to the positive pathways framework commonly used to identify protective factors which prevent homelessness and reduce crisis.

This prevention framework is anchored within the spirit and objectives of the Homelessness Reduction Act and makes provision for:

- Universal prevention - preventing or minimising risk of homelessness and rough sleeping across the wider population at an early stage.
- Targeted prevention - focus on 'at risk' groups and transitions such as young people, BME, prisoner leavers, or mental health patients.
- Crisis prevention – preventing homelessness or rough sleeping likely to occur

within 56 days in line with the Homelessness Reduction Act.

- Emergency prevention – support for those at immediate risk of sleeping rough, by provision of ‘Somewhere Safe to Stay’.
- Recovery prevention – prevention of repeat homelessness and rough sleeping eg through support with tenancy sustainment and employment support (aligning with the intervention Task Group)

The recommendations made in this paper are built around the principle of creating a comprehensive prevention offer which minimises crisis and promotes self-help.

An overview of our recommendations

In essence our focus is on mobilising the full range of partners through their core responsibilities to deliver successful prevention through and beyond the Homelessness Reduction Act, our recommendations are threefold:

- First, we recommend a refreshing of Local Homelessness Strategies alongside an acknowledgement by all that they become the main vehicle through which prevention of homelessness and rough sleeping is collectively owned, organised and delivered.
- Second, that every Government Department make a number of national commitments to preventing homelessness and delivering the Homelessness Reduction Act, including developing an implementation plan, monitoring and reporting their contribution, and ensuring their local delivery agents contribute to prevention activity and targets through Local Homelessness Strategies.
- Third, we make a number of operational recommendations for action to reduce the likelihood of rough sleeping for key at risk groups and transitions, where support is currently absent in many places. In particular we recommend moving quickly to pilot a ‘Somewhere Safe to Stay’ offer for those at immediate risk of rough sleeping (page 9).

Crucially, it is our view that progress will be needed across all three areas in order to make serious inroads into preventing and reducing rough sleeping.

DELIVERY VIA LOCAL HOMELESSNESS STRATEGIES

Recommendation 1. Make refreshed Local Homelessness Strategies the vehicle through which all partner ambitions and funding to prevent homelessness and rough sleeping are locally understood, organised and delivered.

Since the Homelessness Act 2002 the majority of local housing authorities have been required to produce and maintain a homelessness strategy and in 2017 this duty was extended to all local housing authorities.

MHCLG guidance around homelessness review and strategy is non-prescriptive. There is no requirement to refresh the strategy more often than five years, even in the face of significant legislative change like the Homelessness Reduction Act.

Similarly, over time, local homelessness strategies have received gradually less attention and backing from Departments. Instead there has been a proliferation of national initiatives that have fragmented accountabilities and reduced certainty. While additional investment in new schemes is always welcome and well-meaning, over time they add complexity that can impact on the level of success for vulnerable group, who benefit most from a coherent, personalised and stable offer of support over long periods.

Positive steps have been taken since 2017. In particular replacing the Temporary

Accommodation Management Fee with a Flexible Homelessness Support Grant, which gives councils some flexibility in seeking to achieve prevention. We now want to build on this, and believe the introduction of the Homelessness Reduction Act provides the framework through which to refresh Local Homelessness Strategies as the vehicle to achieve change.

Local Housing Authorities should be supported to:

1.1 Review Local Homelessness Strategies as the framework for achieving prevention through organising the range of interventions across a local area in a joined up and coherent

manner, to include preventing rough sleeping. This includes:

- Use a nationally recognised positive pathways prevention framework to support a local exercise mapping the existing offers, identifying needs and reviewing and reshaping provision.
- Meet principles for stakeholder engagement including: consultation, co-production and delivery of the strategy with local statutory, voluntary and commercial partners, faith groups, and those with lived experience; and consultation with neighbouring authorities to minimise inconsistencies.
- Give due consideration to developing a joint Local Homelessness Strategy between a number of local authorities where this makes sense.
- Connect with other locally relevant strategies and plans, including on supported housing, housing, and planning.

1.2 Establish a framework for annually understanding and reviewing trends, and refreshing the strategy to respond to changes. This includes:

- Annually publish local homelessness figures, including rough sleeper count, the numbers in Temporary Accommodation, and presentation which could not be prevented or relieved.
- Set out how the strategy, partners and the interventions will respond to emerging trends in the subsequent 12 months.

1.3 Introduce an annual action plan to tackle and prevent rough sleeping and reduce emerging homelessness. This might include:

- commitments from local public service partners – including those with and without a duty to refer under the HRA, and other partners such as housing associations – to work positively with local housing authorities to prevent homelessness and rough sleeping
- cross service actions for prevention of rough sleeping with key departments within councils, such as social care, youth and education services as well as housing benefits.
- strengthen engagement with the Private Rented Sector (PRS) to encourage the availability of PRS to rough sleepers, or those at risk of rough sleeping i.e. incentives, refurbishment fund, rent guarantees.
- intervention for supporting individuals that present at immediate risk of sleeping rough, such as accessing a ‘Somewhere Safe to Stay’ pilot.
- discretionary support for those at risk of rough sleeping, for instance council tax exemptions for care leavers or use of social housing allocations, but to be determined by local authorities depending on local circumstances and pressures.

1.4 Finance the review with additional funding provided by the MHCLG. This would include:

- Basic level of funding through which to understand the review in light of the

Homelessness Reduction Act and Rough Sleeping Action Plan

- The opportunity to make the case for additional funding - perhaps using PRS access funding allocated in the Budget or Housing First funding - to deliver these objectives where there is a proven need in the Local Homelessness Strategy for which there is not an existing offer or sufficient funding to provide an offer.
- A measure that links additional funding to progress made against outcomes annually published data including on rough sleeping numbers.

Objective	Evidence	Cost	Timescale
To review Local Homelessness Strategies to prevent homelessness and rough sleeping	Introduction of nationally backed Local Homelessness Strategies in 2002 was one action important to helping achieve 35% reduction in homeless acceptances in the nine quarters up to Q4 2005, sharpest reduction in 20 yrs	Minimal additional cost for reviews, anticipated as several million for all authorities in the first year, and then minimum in subsequent years.	In advance of April 2019

A NATIONAL COMMITMENT FROM EVERY GOVERNMENT DEPARTMENT

Recommendation 2: All Government Departments make a strategic commitment to delivering the Homelessness Reduction Act objectives by working with and supporting local areas to prevent homelessness and rough sleeping for all.

It is crucial that all Departments play a positive and collaborative role in the prevention of homelessness and rough sleeping, and that it is not just perceived as the responsibility of MHCLG and local housing authorities.

Collaboration to achieve prevention requires joint ambition, but it also needs common approaches to information, protocols, partnership, case management, training, monitoring, reviews and commissioning; maximising the value from collective investments.

We therefore make a number of recommendations for requiring all Departments to consider their role in preventing homelessness and rough sleeping, to set out what action they will take, and to monitor the success of this action.

All Government Departments should:

2.1 Commit to ending homelessness and rough sleeping by developing a joint statement which details the set of Departmental actions to take, this could include a commitment that no-one becomes homeless directly from leaving their services.

2.2 Review, as part of the wider 2 year review of the Homelessness Reduction Act led by MHCLG, the need to strengthen the legislative ‘duty to refer’ on public authorities into a ‘duty to cooperate’ in the prevention of homelessness and rough sleeping, and extending it to a wider group of public authorities.

2.3 Explicitly acknowledge the Departmental responsibilities in delivering the Homelessness Reduction Act, by developing and publishing a Departmental

Implementation Plan that establishes a ‘commitment to cooperate’ in the prevention of homelessness, beyond the ‘duty to refer’.

2.4 Determine definition of preventing homelessness and rough sleeping for each Department. Identify and define key success factors, put in place data collection and usage through which to monitor the impact of actions, report annually on progress towards ending homelessness and rough sleeping and produce action plans to continue this progress.

2.5 Lead culture change within the Department and its agencies, by providing clear and detailed guidance and training for all service managers, commissioners and staff in delivering the implementation plan through effective multi-agency working locally.

2.6 Adopt default commitment to route all additional funding targeted at supporting homelessness and rough sleeping prevention through Local Homelessness Strategies, either directly or as part of co-commissioning models. A case would have to be made for when adopting a different approach.

2.7 Engage with mechanisms that enable those with lived experience to contribute to codesign services.

Objective	Evidence	Cost	Timescale
To anchor strategic commitments and accountability	There is no means for reflecting homelessness in Departmental action	Minimal additional costs, staff training likely to be the greatest cost	Before April 2019

PREVENTING ROUGH SLEEPING FOR HIGH RISK GROUPS

Recommendation 3: Take forward specific operational Department-led actions to reduce the likelihood of homelessness and rough sleeping for at risk groups and transitions.

Underneath the strategic commitments needed from Departments in the prevention of homelessness, we have identified a number of key cohorts and key transition points where people are at particular risk of ending up rough sleeping due to gaps in support.

Public service works best when designed around the individual, rather than the bureaucracy. For the purposes of this paper we have set out a series of recommendations for each Department with the aim of better incentivising collaboration around individuals.

At risk groups and transitions

There is a good amount of evidence around the groups of people for whom there is an absence of support and a heightened risk of homelessness and rough sleeping, and the points in their life where support is especially necessary in preventing homelessness.

At risk groups for whom there is an absence of support can include people:

- with experiences of childhood trauma
- with mental health issues
- with experience of the criminal justice system
- with underlying health challenges
- under 35, in particular care leavers

- from black and ethnic minority communities
- that are recent migrants
- who have experienced human trafficking and / or modern slavery
- with experience of sleeping rough

At risk points at which there is insufficient support that increases immediate risk of rough sleeping include people:

- moving out of the criminal justice system, particularly short term sentences
- discharged from hospital following treatment
- leaving a mental health institution
- with a recent decision on an asylum claim
- transitioning out of support provided by the National Referral Mechanism (NRM)
- refused or decided not to enter the NRM
- in crisis with nowhere safe to stay that night.

The improvement of support for these groups requires action from a range of partners well beyond local housing authorities, and success will bring wide-ranging benefit for both individuals and services for whom homelessness can entrench barriers.

In addition to the Recommendations 1 and 2, the Ministry of Housing, Communities and Local Government should:

3.1 Support, enable, resource and ensure that local housing authorities, through the implementation of the Homelessness Reduction Act, are enabled to deliver the strategic prevention of homelessness including rough sleeping through refreshed Local Homelessness Strategies. This includes:

- Establish a nationally recognised framework for organising services to prevent homelessness, such as the positive pathway framework, which includes advice for adopting and commissioning different forms of provision, and can be used by councils to develop and refresh Local Homelessness Strategies.
- Link all national homelessness and rough sleeping activity to mainstream duties in the Homelessness Reduction Act and ensure the Act works for single people and rough sleepers, for instance routing the Housing First and PRS Access funding through Local Homeless Strategies.
- Introduce a strengthened role for the Homelessness Advice and Support Team which would offer scrutiny, support and challenge to the development and implementation of Local Homelessness Strategies where there are concerns over quality and impact.
- Properly monitor and review the financing of the Homelessness Reduction Act and commit to making shortfalls in funding were they are identified to ensure the Act is not undermined by lack of resource.

Objective	Evidence	Cost	Timescale
Robust support and endorsement for local leadership in understanding and delivering prevention	There is no requirement for prevention strategy or explicit mention of prevention of rough sleeping in the HRA	Minimal additional cost	Complete before April 2019

3.2 Increase the supply of housing options critical to helping prevent homelessness and rough sleeping, as part of an ambition to also help deliver housing led options including Housing First.

This includes:

- Increase new supply through targeted allocation of grant via Homes England (& GLA); relaxing a range of Housing Revenue Account restrictions – including borrowing and use of Right to Buy receipts - for specific suitable housing, and; review capacity to add supply via developer contributions.
- Ensure the current review of short term Supported Housing delivers a secure funding model that secures existing provision and promotes future supply to meet local needs. For instance phase in delivery through transitional arrangements that involve piloting local authority commissioning in a number of areas, or other means for ensuring local authority oversight of the total offer.
- Ensure Private Registered Providers commit to cooperate with local services in the prevention of homelessness and rough sleeping. For instance by revising regulations published by the Regulator of Social Housing, and seek a commitment from the sector that no one is made homeless from social housing.
- Undertake a strategic review of the tenancy framework within the private rented centre and its potential role in housing, including in homelessness prevention through tenancy 9 sustainment. This might include additional tenancy security at a national level, and national backing of financial or policy incentives routed through Local Homeless Strategies such as national bond deposit scheme and Help to Rent projects.
- Develop an affordable housing offer for young people which underpins their engagement in education and employment.

Objective	Evidence	Cost	Timescale
Secure and increase supply of housing critical to crisis prevention of rough sleeping and upstream prevention of homelessness	Increasing homelessness, undersupply in the provision of supported housing of around 17,000 places, and reliance on expensive Temporary Accommodation, tripling of net costs for councils in three years.	Minimal additional cost. Increased borrowing by councils will phase up over time.	Complete before April 2019

3.3 Move quickly to pilot a new ‘Somewhere Safe to Stay’ offer for preventing rough sleeping among those at immediate risk, basing services on the ‘No Second Night Out’ (NSNO) service in London.

The offer includes:

- Emergency assessment hubs for people who would otherwise have no option to sleep rough for the first time, where rapid assessment is carried out and options determined and providing basic time-limited shelter for up to 72 hours which is staffed 24/7.
- Pilots offered to the 15 local housing authority areas with the highest number of rough sleepers, in order to have an immediate impact on numbers and to provide rigorous testing of issues, such as demand, success factors, move-through and risks of ‘silting up’, and possible pressures on temporary accommodation.
- A clear national definition and specification developed to ensure proper evaluation of model, including thorough understanding of local circumstances including demand and supply of services and accommodation to move on to.
- Required co-operation from local agencies to refer people on to access the support in advance of sleeping rough, which differs from NSNO which requires

someone to have slept rough to access support.

- Once demands and costs are clear, consider how to roll out to all areas including potential amendments to the Homelessness Reduction Act.

Objective	Evidence	Cost	Timescale
Preventing the need for people to sleep rough in order to access services and support, providing initial assessment of need and reassuring public that an offer still exists	In London 84% of rough sleepers that access NSNO in 2016/17 did not sleep rough again.	Need for proper modelling, evidence from NSNO estimates costs of £1,800 per participant but depends on type of service and availability of other support.	Beginning before winter 2018

In addition to the Recommendations 1 and 2, the Department for Work and Pensions should:

3.4 Ensure employment support is aligned to homeless prevention goals. This includes:

- Develop guidance in consultation with homelessness organisations for Jobcentre Plus work coaches for use of the Flexible Support Fund to support homelessness prevention and response, and improving monitoring of how the FSF is spent.
- Ensure initial assessment framework to record data on homelessness and housing need and inform approaches going forward to stabilise housing and work towards employment opportunities.
- Enable and encourage Jobcentre Plus work coaches to adjust the timings and frequency of face-to-face contact with customers at risk of homelessness
- Create a specialist training module with homelessness organisations to Jobcentre Plus work coaches on homelessness and housing need.
- Introduce homelessness and housing specialists into Jobcentre Plus to lead on partnership working, training, and homelessness prevention strategies.

Objective	Evidence	Cost	Timescale
Embed prevention goals among employment support	Newcastle trailblazer demonstrating outcomes through collaboration	Minimal additional cost	Complete before April 2019

3.5 To adapt welfare reforms to make homelessness less likely among key groups. This includes:

- Lift the Shared Accommodation Rate restriction for under 35 year olds, or at a minimum widen existing exemptions for those groups proven to be at a higher risk of homelessness, including all those made a Housing First offer.

Objective	Evidence	Cost	Timescale
Increase housing options for under35s, which represent over a third of rough	90% of councils report difficulties in providing shared housing to single	£62.3 million should all claimants aged 25 – 34 claiming the SAR move into a one-bed. A cost of	Implement before Winter 2018

sleepers in London	young people.	£2,027 per year per person.	
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- Re-align Local Housing Allowance rates back to the 30th percentile of local rents and linking them with rental inflation going forward, and begin a comprehensive review LHA rates beyond 2020 taking into account the Overall Benefit Cap. Or as a minimum review the impact of the Targeted Affordability Fund with a view to understand how further increasing its funding would prevent rough sleeping and whether the suitable level of stock is available.

Objective	Evidence	Cost	Timescale
Increase capacity for private landlords to prevent rough sleeping.	90% of councils identified reduced PRS offer for people at risk as a result of LHA freeze. Around 40% identified reduced PRP offer.	A one-off increase in LHA rates to 30th percentile of local rents would cost around £1.2 billion.	In advance of Winter 2018.

- Simplify and streamline the process for making Universal Credit rent payments directly to a landlord if tenants have been assisted into their home through a private rental access scheme, or where a risk of rough sleeping has been identified, including those on remand or subject to short term prison sentencing.

Objective	Evidence	Cost	Timescale
Increase likelihood for private landlords to prevent rough sleeping.	22% landlords say UC will make them less likely to rent to this group.	Minimal additional cost	In advance of Winter 2018.

- Ensure, within the scope of the GDPR, that local housing authorities have full and timely access to information about Universal Credit claims to ensure effective integration of national and local welfare support, including LCTS, Housing Benefit (for those who remain on HB for housing costs), DHP and public sector debt.
- Review (working with MHCLG) links between Personal Housing Plans and claimant commitments under Universal Credit so that they do not result in conflicting or unrealistic demands on people.

Objective	Evidence	Cost	Timescale
Achieving operational collaboration.	Inability to share data identified by front line practitioners as a limiting factor.	Minimal additional cost	In advance of April 2019

3.6 Ensure conditionality is appropriately applied to homeless people, reduce or end the use of sanctions where individuals may be experiencing housing stress. This includes:

- Extend the current homelessness easement to all people that are homeless and at risk of homelessness and those who have been helped into a new tenancy, including Housing First offers, to allow Jobcentre work coaches and Housing Options teams to stabilise housing before focusing on employment
- Monitor and ensure work coaches use flexibility in issuing sanctions to those in

precarious housing position, and support to utilise the risk of rough sleeping tool as a determinant within the decision making process

- Issue further policy/guidance to require Work Coaches to take into account the haphazard nature of an individual who is insecurely housed, rough sleeping or recently out of rough sleeping
- Address operational errors leading to a break in housing benefit following an imposition of a sanction, and when errors are made consider use of hardship payments and require that the council is notified immediately to help reduce the risk of homelessness.

Objective	Evidence	Cost	Timescale
To increase understanding and flexibility within JCP to ensure sanctions do not lead to, or exacerbate, housing crisis.	Homelessness people are ten times more likely to receive a sanction compared to the wider population.	Minimal additional cost	In advance of winter 2019

3.7 Ensure that local housing authorities have adequate and appropriately devolved resources to support vulnerable claimants at risk of homelessness, in particular those affected by welfare reforms. This includes:

- Improve the scope for councils to improve accessibility and integration of Universal Support with other appropriate interventions for claimants at risk of homelessness and rough sleeping, in particular during the transition to Universal Credit
- Set out the support and resources that will be available to councils to transition vulnerable claimants on to Universal Credit during the 'managed migration' phase.
- Review Discretionary Housing Payment (DHP) to ensure that it can be used effectively to sustain tenancies and enable households to transition towards great financial stability and independence

Objective	Evidence	Cost	Timescale
Clarifying and equipping councils with the tools to provide an effective safety net.	Clarifying and equipping councils with the tools to provide an effective safety net.	Minimal additional cost	In advance of April 2019

3.8 Ensure the provision of support for individuals from the European Economic Area. This includes:

- Reinstate entitlement to Housing Benefit or the housing element of universal Credit for EEA nationals with 'jobseeker' status.
- Give all EEA nationals with a right to reside who are homeless or threatened with homelessness a limited entitlement to benefits for six months, including Housing Benefit

Objective	Evidence	Cost	Timescale
Providing basic level of financial support promoting job		To be calculated	In advance of April 2019

outcomes.			
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In addition to the Recommendations 1 and 2, the Department for Health and Social Care should:

3.9 Improve the understanding of the links between health and homelessness to inform provision. This includes:

- Require NHS England and NHS services to implement new data collection on housing circumstances and homelessness, across all health services, to enable the identification of risks to health and appropriate action, and monitor access and outcomes to address health inequalities.
- Commit to share, upon request by councils, medical information regarding a homelessness applicant (with their consent) so that councils can identify vulnerabilities and housing requirements.

Objective	Evidence	Cost	Timescale
Embed data and understanding of housing stress across health and housing	The need is recognised and initial scoping work is underway.	Some initial set up cost.	In advance of April 2019

3.10 Review strategies and frameworks to better plan for housing with health. This includes:

- Support Sustainability and Transformation Partnerships, and emerging Accountable Care/Integrated Care systems, to undertake needs assessments and review their plans to improve and sustain health care services, improve outcomes and reduce health inequalities for populations at risk of being homelessness.
- Pilot an integrated fund (akin to Better Care Fund) that brings together health care funding with social care, housing and homelessness to specifically end rough sleeping, improve health and wellbeing and reduce health inequalities.
- Revisit and revise the commissioning guidance and related resources developed by the Inclusion Health Board eg, Commissioning Inclusive Health Services: practical steps
- Commit to inclusion of health workers in multi-agency teams for those rough sleeping or at immediate risk of rough sleeping
- Commit to include housing as part of any recovery or treatment plan for all patients.
- Providing specialised General Practitioner provision in high risk areas, with appropriate access arrangements.

Objective	Evidence	Cost	Timescale
Enable cross-sector action and accountability	Trailblazer learning from Oxford City Council and LB Southwark	Minimal additional costs.	In advance of April 2019

3.11 Address systemic gaps in health and homelessness provision found in many places. This includes:

- Develop an equivalent to the Mental Health Crisis Care Concordat for homelessness and rough sleeping, and resource appropriate mental health services to meet the needs of people in order to prevent homeless and rough sleeping.

- Promote services within Psychologically Informed Environments that can respond to people who are at risk of homelessness and rough sleeping and may have experienced trauma and adverse childhood experiences.
- Targeted funding for vulnerable adults at risk of rough sleeping who do not meet social care thresholds or do not engage with services.
- Targeted funding to deliver rapid access to drug and alcohol services for individuals who are currently unable to access services because they do not meet local connection criteria.

Objective	Evidence	Cost	Timescale
Specific interventions to plug gaps in support an advice	71% increase in households found vulnerable due to mental health since 2009/10	Additional costs to scale up provision, linked to mental health strategy	In advance of April 2018.

3.12 Provide essential support for at risk individuals around key transition points. This includes:

- Improve accountability for safe discharge from inpatient services by requiring the NHS to work with councils to ensure every patient has suitable accommodation to go to and is linked into ongoing treatment and support, and require a hospital discharge accommodation service in large hospitals or those hospitals in high risk areas.
- Requiring NHSE to measure the preventable readmission rates and accommodation outcomes on discharge, and take action to ensure progress each year.
- Review, with NHSE, the transitions between child and adult mental health services and ensure targeted support at this stage for people with multiple and complex needs.

Objective	Evidence	Cost	Timescale
Nobody becomes homeless directly upon leaving the health system	70% of homeless people admitted to hospital are discharged onto the streets. However in Homelessness Hospital Discharge Fund programme projects, 93% of patients moving into suitable accommodation when NHS and housing staff collaborated.	Minimal additional costs.	In advance of April 2019.

3.13 Develop and support frontline health practitioners. This includes:

- Resource Health Education England to develop resources/ongoing training to support the (physical and mental) health and care workforce.
- Enable health care qualifications to include a mandatory module on the impact of precarious housing and homelessness on health and wellbeing across the population, and what action can and should be taken by the workforce to reduce this impact.
- Resource and otherwise support the use of peers in enabling access to, and delivering, services to improve health and wellbeing.

3.14 Commit to undertaking a serious case review for death of a person sleeping rough in order to inform prevention, and collate and publish numbers and review findings at the national level.

Objective	Evidence	Cost	Timescale
To set and meet objective to ensure no-one dies on the streets	Number of rough sleeping deaths are increasing.	Minimal additional costs.	In advance of winter 2019.

In addition to the Recommendations 1 and 2, the Ministry of Justice should:

3.15 Better understand the housing circumstances of those in contact with the criminal justice system. This includes:

- Requiring key stakeholders including prisons and probation providers to record and publish both the accommodation needs and long term outcomes of people in contact with the criminal justice system, in particular accommodation outcomes achieved for short sentence prisoners.
- Ensuring local organisations are frequently informed and updated about their role and responsibility in relation to meeting the accommodation needs of people in contact with the criminal justice system in England and Wales

Objective	Evidence	Cost	Timescale
Understand and improve the instances of prisoners sleeping rough	Strong evidence - for instance through CHAIN - on incidence of prison leavers in rough sleeping population, around a third of the rough sleeping population have spent time in prison, and that 2.7% have prison recorded as last settled home. But other than that, understand is limited	Minimal additional cost.	In advance of April 2018.

3.16 Commit to ensuring support to find accommodation is part of rehabilitative work. This includes:

- Introduce a Housing Resettlement Services in every resettlement prison and youth justice secure estate working with all prisoners at risk of homelessness on release.
- Introduce the Youth Justice Accommodation Pathway Framework approved by MoJ and MHCLG.
- Obligate Governors to introduce integrated transition plans for all prisoners and set out multi-agency protocols for working in partnership to reduce repeat offending and rough sleeping.
- Set minimum standards for housing advice, information and support for people on remand, in prison or other custody, using Peer Mentor models to secure maximum engagement from point of entry (in line with Scottish model). This should include a housing outcome, similar to the employment outcome, in the next rehabilitation commissioning strategy.
- Revise approach to sentencing and/or prison release planning so that either

suitable accommodation is available on Friday release dates and/or so that the release date is changed to enable access to suitable accommodation.

- Provide guidance to probation services to clarify what information can be shared with landlords about individuals to help them access accommodation in the private rented sector.
- Increase the level of Discharge Grant available to prisoners on release.
- Pilot a new prison leaver assessment hub service to eliminate rough sleeping among this cohort

Objective	Evidence	Cost	Timescale
Nobody becomes homeless directly upon leaving the criminal justice system.	A third of prisoners say they have nowhere to go upon release. The 2016 Chief Inspectors found support for short term prisoners, was severely lacking.	Some additional costs, to be modelled.	In advance of April 2019.

3.17 Extend the scope of legal aid in England to include all immigration cases and early legal help for all social welfare law.

Objective	Evidence	Cost	Timescale
Guaranteeing legal advice reducing risk of rough sleeping among migrant population	Most mainstream non-asylum immigration cases are no longer eligible for Legal Aid	Some additional costs, to be modelled.	In advance of April 2019.

In addition to the Recommendations 1 and 2, the Home Office should:

3.18 Develop an understanding of the links between migration status and homelessness. This includes:

- Publish data on homelessness migrants coming into contact with the Home Office, for instance the number of people homeless when detained, number of people who are homeless when released from detention, time taken to make a decision on different applications for leave.
 - Create a mechanism easily accessed by councils to identify whether someone is eligible for housing, for instance the ability to check someone's status through IT or another form at the point of access by the applicant as the information is fundamental and will affect any advice given, building on existing mechanisms such as NRPF Connect.
- 3.19 Clarify and communicate advice for migrant applicants.

This includes:

- Provide clear, easy-to-understand advice to non-eligible applicants on housing options, including assistance/support to return to their country of origin or available in this country as appropriate
- Improve advice to councils on the complex areas of immigration status and ineligibility so local authorities can easily access information and understand circumstances of each applicant.

3.20 Enable sufficient support for refugees and former asylum seekers. This includes:

- Ensure that refugees/former asylum seekers have accommodation upon

determination of right of residence in the UK by making a commitment that upon making a decision refugees are given 56 days notice to leave in line with the Homelessness Reduction Act, which will facilitate the council time to find alternative housing options across all housing sectors.

- Make a commitment that no asylum seekers with a negative decision will leave National Asylum Support Service accommodation to an unsettled address.

3.21 Make homelessness less likely among the migrant population by ending the Right to Rent policy, or introducing measures that increase the confidence among private landlords to take in tenants from another country, for instance by giving landlords a greater period of time within which to take action when someone is deemed to no longer have the right to rent.

Objective	Evidence	Cost	Timescale
Nobody becomes homeless directly upon leaving the migrant or asylum service.	The UK No Accommodation Network members saw 824 refugees who faced significant obstacles to mainstream housing after the move-on period, and had to turn away over 1,000 people from services due to limited capacity	The extension from 28 days to 56 days notice will likely increase costs, dampened by future savings and Housing Benefit / UC costs.	In advance of April 2019.

3.22 Reducing the risks that victims of modern slavery become homelessness. This includes:

- Establish the extent to which homelessness is a driver or consequence of modern slavery, and the extent to which the use of 'No Recourse to Public Funds' increases risks around modern slavery and other forms of exploitation.
- Improve data collection on homelessness through the national referral mechanism and better data on modern slavery through homelessness systems/ H-CLIC.
- Extend the support available through the National Referral Mechanism for those who receive a positive conclusive grounds decision to 56 days in line with the Homelessness Reduction Act
- Commitment that no one receiving a negative conclusive grounds decision will leave to an unsettled address.

3.23 Resource and equip frontline staff to participate in prevention. This includes:

- Require detention centres and resettlement teams to collaborate with councils when releasing people that are at risk of homelessness, and link to national training programme to improve understanding, tolerance and consistency of approach across force areas to tackling community safety concerns.
- Support police forces to learn from instances of good practice in preventing homelessness and rough sleeping. For instance, developing joint outreach approaches with housing services tailored to tackle begging, street drinking, anti-social behaviour and rough sleeping.

Objective	Evidence	Cost	Timescale
Embed prevention culture across Home	Lacking understanding of prevention options	Minimal additional cost	In advance of April 2019.

Office front line staff	among enforcement professionals		
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In addition to the Recommendations 1 and 2, the Department for Education should:
 3.24 Educate young people and educators around the realities of homelessness. This includes:

- Greater education for young people of the housing options that exist and how easy they are to access, and consider including in the curriculum.
 - Link national training programme to spot signs of housing stress and the 'risk of rough sleeping tool' amongst school age children, such as truancy.
- 3.25 Commit to early intervention services for children and young people from chaotic home scenarios.

This includes:

- Building an understanding for how childhood trauma can lead to experiences of homelessness and rough sleeping
- Promote implementation of the Care Leaver Positive Accommodation and Support Framework
- Targeted funding for care leavers with complex needs to access appropriate care and supported accommodation placements.

Funding an accommodation lead officer in every leaving care service. 3.26 Require providers seeking to re-engage young people in education, employment and training are trained in identifying and supporting those at risk of rough sleeping. This includes:

- Enable National Careers Service advisers greater flexibility to work with other agencies, including JCP work coaches, around individuals and adjust timings and frequency of face-to-face contact dependent on their needs
- Requiring the Youth Obligation to recognise those at risk of sleeping rough and to prioritise the provision of support into employment, education or training.

Objective	Evidence	Cost	Timescale
Embed prevention culture across key Department for Education staff	Fragmentation of services and accountabilities around young people at risk of homelessness	Minimal additional cost	In advance of April 2019

The Prevention Task and Finish Group and the process for arriving at these recommendations This paper has been developed by the Prevention Task and Finish Group (TFG) which includes representatives of the following organisations:

- Cornwall Council
- Crisis
- LB Croydon
- Greater London Authority
- Homeless Link
- Local Government Association
- MHCLG
- Shelter
- St Basils
- St Mungos
- LB Waltham Forest
- LB Westminster

The TFG met on two occasions in developing the recommendations, and in between

these meetings undertook various tasks to researching and developing proposals.

There are further papers providing more detail on many of the recommendations, including on: Local Homelessness Strategies; Nowhere Safe to Stay; piloting a prison leaver's hub; refugee move-on period and; welfare reform. These can be made available on request.

The recommendations in this paper do not necessarily reflect the policy of all the member organisations of the TFG.

The TFG was chaired and hosted by the Local Government Association.

May 2020

ⁱ https://england.shelter.org.uk/media/press_releases/articles/1.7_million_renters_expect_to_lose_their_job_in_the_next_three_months

ⁱⁱ <https://www.babergh.gov.uk/news/council-teams-and-local-business-restore-property-in-less-than-a-week-in-order-to-house-vulnerable-residents/>

ⁱⁱⁱ <https://careappointments.com/care-news/england/143184/manchester-and-liverpool-rough-sleepers-to-be-housed-in-hotels-during-coronavirus-outbreak/>

^{iv} <http://www.nrpfnetwork.org.uk/Documents/NRPF-connect-annual-report-2018-19.pdf>

^v Internal Women's aid data

^{vi} <https://www.southwark.gov.uk/benefits-and-support/emergency-support>

^{vii} https://www.sustainweb.org/publications/food_for_vulnerable_people_in_covid_lockdown/

^{viii} https://www.sustainweb.org/publications/food_for_vulnerable_people_in_covid_lockdown/

^{ix} <https://www.insidehousing.co.uk/insight/council-housebuilding-back-with-a-vengeance-63510>

^x <http://www.cih.org/resources/PDF/Policy%20free%20download%20pdfs/LA%20New%20Build%20Report%20Jan20.pdf>

^{xi} https://www.gov.uk/government/publications/shared-ownership-and-affordable-homes-programme-2016-to-2021-summary-end-of-september-2019?utm_source=90a24f96-eb0d-4d33-aaf6-4d1d147b14c3&utm_medium=email&utm_campaign=govuk-notifications&utm_content=immediate