

Written evidence submitted by the Association of Housing Advice Services and the North London Housing Partnership [IOC 176]

AHAS (the Association of Housing Advice Services) represents statutory housing advice and options and housing needs services; the majority of its members operate in London and the South East. AHAS was set up in late 1980s to promote and share good practice in housing needs services and raise awareness of issues within the PRS.

The North London Housing Partnership (NLHP) was set up in 2004, and is an informal group comprising of six London authorities. The Partnership works closely with each of the authorities, and has a strong reputation and track record in bidding for, and successfully delivering a range of housing and homelessness initiatives; provides policy support; and acts as a voice for North London.

<p>Top Asks:</p>	<ol style="list-style-type: none"> 1. A fundamental review of funding focusing on increasing provision of affordable PRS accommodation by an overhaul of welfare reform. Most urgently to include an uprating of the overall benefit cap to reflect the new LHA rates. This would help us with move-on and all homelessness in the future. A commitment for long term support and services for borough and London-wide rough sleeping services; and funding support for local authorities housing NRPf Cohort. 2. A health led approach to dealing with the most vulnerable at risk rough sleepers. 3. A regional response to rough sleeping and a commitment to ensure Local Connection supports authorities disproportionately impacted by hosting rough sleepers from outside their boroughs or via the GLA's Pan-London Hotels Programme. 4. Amend Schedule 1 Housing Act 1985 to allow discharge of homeless duties through PSL and then support the PRS by extending Private Sector Leasing Schemes. This can provide settled accommodation and improve management standards, and give a guaranteed income to landlord/investors whilst achieving possible capital growth. 		
<p>What is the impact on these groups?</p>	<p>Those in the private rented sector?</p>	<p>Rough sleepers?</p>	<p>The homeless?</p>
<p>How effective has the support provided by MHCLG and other Government departments in addressing the impact of COVID-19</p>	<p>Government funding has been welcomed – both in terms of the initial release of £1.6b to help the most vulnerable inc. homeless as announced 26th March to support first phase of the response; followed up by an additional £1.6b announced 19th April.</p> <p>MHCLG's initial Co-VID RS Contingency Fund announced 17th March made no provision to support the NLHP's EEA RS Cold Weather Shelter – which had been set up using MHCLG derogation funding. As a cross borough referral scheme, this proved problematic, but we were subsequently able to utilise the GLA's Pan-London Hotels programme.</p>		

	<p>Funding has enabled nearly 90% of all RS off the streets into accommodation.</p> <p>The Government’s 3-month ban on evictions, ending 30th June was also welcomed – in recognition that evictions are the largest cause of homelessness.</p> <p>The Government’s call to support all RS off the streets in a matter of days – whilst fully supported – led to significant procurement challenges for local authorities; intense competition, inflated prices, and compliance issues</p> <p>There has been a raft of guidance notes and briefings – these have largely been useful, but local authorities are still receiving mixed messages verbally, eg. Government funding for NRPF clients who authorities have been assisting as part of their emergency response.</p>		
<p>What problems remain a current and immediate concern for these groups</p>	<p>Continual challenges in procuring PRS/other accommodation. This has led to authorities becoming more reliant on hotel placements – often in other parts of London that are not normally used, creating issues around getting and providing support.</p> <p>Where there is access to PRS – this has become even more challenging with landlords refusing to let properties during the emergency and clients declining to move due to lockdown.</p> <p>An anticipated increase in the use of mandatory Ground 8 evictions for rent arrears when landlords are able to recommence possession proceedings.</p>	<p>There remain a no. of RS still on the streets – 556 in London as at 22nd April.</p> <p>In North London, there are a no. of RS who are refusing accommodation /support - largely EEAs in encampments.</p> <p>There is a growing problem of new RS going on to the streets - not previously known to boroughs.</p> <p>Continued presentation of rough sleepers including those who have no recourse to public funds. We are receiving Rough sleepers from other boroughs and outside London (from Birmingham/Oxford for example).</p> <p>Of those RS already placed -</p>	<p>Part 7/statutory approaches are currently at low levels.</p> <p>For prison releases/ hospital discharges accommodation needs to be in place first.</p> <p>The use of shared accommodation that would breach social distancing requirements means that we are not able to place under 35s to prevent their homelessness.</p> <p>NRPF Clients – Make up a significant share of those rehoused.</p> <p>Government line that there will be no funding for NRPF cases rehoused - note issued last week has subsequently been withdrawn.</p>

	<p>Rogue letting agent operations continue, increasing tenants rent but offering other rooms in other HMOs to help navigate the eviction ban for landlords.</p> <p>Sham tenancy agreements are also in operation.</p> <p>Some landlords and agents are refusing rent holidays for tenants who approach them for rent delays because they are experiencing financial difficulty due to the Coronavirus pandemic.</p> <p>Many overseas tenants have lost jobs and have no access to housing benefit or universal credit so will not be able to pay rent.</p>	<p>particularly in hotels – some are returning to the streets.</p> <p>NRPF – This cohort remains one of the biggest concerns for authorities, and forms a high percentage of those still on the streets.</p> <p>Concerns about pressures from DV/hospital discharge/leaving care/prisons.</p> <p>Until recently, there has been a lack of, or non-existence of testing, and contact tracing for hostel and outreach staff, homeless people and rough sleepers – with no test kits available.</p> <p>Challenges with client compliance with social distancing and self-isolation.</p> <p>The pre-existing lack of suitable accommodation with housing related support and support for mental health, physical health drug and alcohol addiction, trauma and abuse, food provision and laundry cannot be addressed overnight or even in the short term.</p>	<p>Lack of PPE equipment for key workers.</p>
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<p>What might be the immediate post-lockdown impacts for these groups</p>	<p>An anticipated increase in the use of mandatory Ground 8 evictions for rent arrears when landlords are able to recommence possession proceedings.</p> <p>Similarly, anticipated increase in evictions due to breakdown in family relationships and domestic violence during lockdown – there is a risk that the number of evictions will increase as soon as the lock down is lifted due to conflicts during lockdown.</p> <p>The need for a vastly increased DHP budget to assist with rent arrears.</p> <p>The impact of Covid-19 including loss or reduction of income will be long-term for some PRS tenants meaning their accommodation is no longer affordable even if short-term arrears were addressed.</p>	<p>Concerns about the exit strategy after lockdown in terms of moving RS on, eligibility/local connections issues, procurement pressures, resurgence of NPA, inflated prices and property compliance issues.</p> <p>Exit strategy for those placed in GLA/other hotels to avoid a mass return to the streets.</p> <p>‘In For Good’ principles – ie. those who have been placed in emergency accommodation are not asked to leave that emergency accommodation without an ongoing offer of support – This needs to be planned and co-ordinated, with sufficient lead in time to organise this, and what the offer might look like.</p>	<p>Concerns about demand for when restrictions are lifted in terms of presenting households</p>

<p>What action is needed to help with the post lockdown issues?</p>	<p>Lift the benefit cap: LHA increases are welcome but an essential requirement is for benefit caps to be lifted as well.</p> <p>Extension of mortgage holidays and possession suspensions – we suggest by a further 3 months to allow benefits agencies and landlords to work together to prevent homelessness.</p> <p>Mortgage Holidays/financial loan for landlords where rent is not being paid but they cannot evict so they do not go bankrupt and the unit is lost from the housing market.</p> <p>Energy Certificate Exemptions (EPC) for Landlords for 3 months post lockdown.</p> <p>Additional DWP resource to speed up benefits claims for those who have lost their jobs in an attempt to prevent homelessness and providing emergency funding to cover gaps in benefits.</p> <p>Housing element payments to continue to be paid where appeals have been lodged to reduce homelessness.</p>	<p>We are supporting the London RS Next Steps Strategy which is currently being finalised. Objectives include:</p> <ul style="list-style-type: none"> -The need for identified routes to resolution for any barriers to making an offer to support to every individual -To ensure that responsibility is shared across London, and no borough is disadvantaged due to, for example, the presence of a GLA procured in their borough -To ensure that responsibility is shared fairly across London boroughs, and that none are disproportionately impacted by hosting rough sleepers from outside their boroughs. -To ensure that timing is staggered and does not present an unnecessary ‘cliff edge’ as lockdown is lifted, to prevent services being overloaded# -To recognise the need for a London-wide approach which supports and complements the efforts of individual boroughs and providers. <p>Funding - Clear and timely decisions on funding available, commitment from Government and guidance to local authorities for those who are not eligible for housing support, eg. NRPF/no-local connection.</p>	<p>More funding and easy access to sufficiently resourced relevant support services - including probation services, mental health support, substance misuse, adult learning and employability, employment, universal credit, housing options, the GLA supported Covid19 rough sleeping provision, Personal Advisors of young people leaving care.</p> <p>Funding Investment to make hostel accommodation ensuite or self-contained in future.</p>
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	<p>Suspend disability assessments until the autumn.</p> <p>End the shared accommodation rate of housing benefit/Universal Credit housing costs for single private renters under 35yrs. This will be cheaper than the homelessness and other negative impacts the SAR has.</p> <p>Share benefits data between DWP and local authorities to identify those at risk who need support.</p> <p>Delay the roll out of Universal Credit.</p> <p>Legislation and Guidance - Landlord and tenant guidance requires more robust messages which are easy to understand.</p> <p>HMOs tighter legislation for illegal evictions.</p> <p>More funding and easy access to sufficiently resourced relevant support services - including probation services, mental health support, substance misuse, adult learning and employability, employment, universal credit, housing options, the GLA supported Covid19 rough sleeping</p>	<p>Need to assess the impact/cost/sustainability of floating support, concierge service or sector specific support (outside of the support services listed) that is currently being provided in the hotels and will be needed for the transition to any further accommodation to ensure sustained resettlement.</p> <p>No Recourse to Public Funds FastTrack Status Response – a fast track response from the Home Office is needed to confirm status and process claims (EEA or asylum) to enable access to move on options.</p> <p>Guidance to Local Authorities on Assessments for EEAs - There is an increase in EEA nationals who are not eligible for support due to job losses. We request guidance to local authorities on reconnection and how to assess who it is reasonable to advise to return to other countries where the virus may still be prevalent / not prevalent.</p> <p>Need for guidance for non-compliancy around self-isolation.</p>	
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	<p>provision, Personal Advisors of young people leaving care.</p> <p>No prison or hospital discharges without accommodation in place first.</p> <p>Extending PSL Schemes - Given the large financial uncertainty in rental income (due to recession) & property price uncertainty, there is a real danger that PRS will contract significantly. This will also be driven by abolition of S21. Extending Private Sector Leasing Schemes would give the opportunity for landlords to have medium term investment into the PRS without being potentially locked in forever. Can improve management standards, and give a guaranteed income to landlord/investors whilst achieving possible capital growth. This will require an amendment to Schedule 1 Housing Act 1985, which could allow councils to lease properties to offer local households on non-secure tenancies without it being part of a homelessness duty. In that way this property could be used to end homelessness rather than as Temporary Accommodation. Housing Benefit regulations would also need to change to set recoverable benefit level at LHA. (But for families who</p>	<p>Potential public health threat that CV19 may be a repeating seasonal threat. While all the focus is on dealing with the RS we have now, we should perhaps be planning for the possibility of future self-isolation events next Winter.</p>	
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May 2020