

# Homelessness Reduction Act

## Call for evidence response summary



October 2019

### Top line

Homelessness is not a 'housing issue', but the result of a series of structural and individual factors – and needs to be addressed as such. Whilst the Act has been effective, it could make far greater inroads into tackling homelessness were local authorities to have access to reliably-funded support service networks for those being rehoused, and to sufficient suitable accommodation.

### Key recommendations

- Replace the Duty to Refer with a more outcome-focused and collaborative **Duty to Cooperate**, compelling partner agencies to work proactively
- Introduce **Homelessness Reduction Boards** with oversight of accountable joined-up support networks, to ensure that local authorities can deliver against their new duties
- Provide local authorities with long-term **ringfenced revenue funding, for essential support** services to help vulnerable people sustain tenancies
- Offer a **more flexible approach to local connection requirements** for vulnerable groups such as those leaving prison or care; and scope to **adapt standardised procedures** such as personalised action plans for those with support needs

### Our role in implementing the Homelessness Reduction Act

We have seen first-hand the changes wrought by the new legislation. We process homeless applications, manage housing waiting lists and offer housing advice on behalf of two local authorities in the Midlands region.

### Positive effects of the Act

*Earlier intervention* ~ In our experience, housing authorities' involvement in homelessness reduction has increased. The ability to access housing advice and assistance 56 days ahead of potential homelessness means interventions are secured earlier for households at risk. The Act enables them to access essential information and local expertise regarding housing options, in a more timely fashion, potentially averting crisis.

*Greater reach* ~ Households previously without priority for assistance are getting more help and advice. The primary beneficiaries are single adults and working households facing unexpected housing issues. This includes the 'hidden homeless' such as sofa surfers, who now benefit from in-depth advice and help.

*Better partnerships* ~ The Act has encouraged new partnerships and strengthened existing ones. New drop-in sessions signpost to the DWP and other partner agencies. Community law services support households to make homeless applications, and work with local authorities to avoid possession proceedings wherever possible.

## Challenges

*Resourcing requirements* ~ To deliver on their new duties, local authorities have had to invest more in frontline services. Our advice centres have recruited additional staff, upgraded record-keeping systems and refitted office space to accommodate more interview rooms.

Where resourcing does not rise correspondingly, increasing demand and responsibilities have led to renewed overspill between housing authorities. Service users contacting a neighbouring local authority when their own council's telephone lines and drop-ins are too busy, will ultimately be turned away for permanent housing if they have no local connection.

*Local connection problems* ~ In some cases, tenants are accessing short-term temporary accommodation in neighbouring boroughs where they cannot seek a more permanent allocation due to lack of local connection. The short-term temporary accommodation duty has also led to serial applicants moving from area to area when refused. These cases increase accommodation costs and prolong waiting times for others, without achieving a permanent home for the client.

Certain groups' journey out of homelessness may be hindered by rigid definitions of local connection. The expectation that a care leaver's local connection is tied to the area where they were in care can disrupt early adult life. Beyond age 21, those facing homelessness are referred back to the borough where they were in care prior to age 16, uprooting them from work/study and social circles.

A similar problem arises for those leaving prison: their probation office does not constitute a local connection. In instances where they are referred to the area where this is based, a further outward referral is made to another local authority.

*The Duty to Refer* ~ This is insufficient in its current form. In our experience, it may be actioned in a manner unlikely to benefit the referee. Organisations commissioned to assist in homelessness reduction may cease intervening directly where a referral can be made to a local authority. Lack of awareness among partner agencies can lead to delayed referrals, so that the 56-day countdown to foreseeable homelessness has largely elapsed prior to referral.

Referrers may simultaneously refer an individual to several neighbouring local authorities, or simply choose a local authority they find to be helpful – but these approaches are not beneficial in the longer term, as the client may have no local connection. A more proactive and outcome-focused Duty to Cooperate would foster stronger partnership working with more even distribution of responsibilities.

*Standardised services unsuited to users* ~ Broader engagement and collaborative approaches have not necessarily proven person-centred in practice. Although personalised action plans may be helpful to some service users, additional paperwork necessitates increased staffing hours, and can detract from direct service delivery yielding tangible client outcomes.

Clients with support needs often do not make use of their personalised action plans. Some lack sufficient literacy or fluency to understand their plan. They may not grasp the plan's purpose, or may lack confidence to take action as recommended. Given greater funding certainty, outreach support services would be better able to address this level of need.

*Insufficient support* ~ Housing authorities may increasingly deal with high-needs cases, and suffer from gaps in provision and shortages of suitable accommodation. The introduction of new duties and entitlements has been implemented without accompanying pledges of long-term funding for affordable housing or support services. Non-statutory services would be better positioned to address factors that affect tenancy sustainment, if they could be assured of long-term funding.

Vulnerable people may also find themselves trapped in a gap between different public services' eligibility criteria. Those affected experience cyclical homelessness as support needs are not met.

*Mismatches between welfare entitlements and housing stock* ~ The Act has thrown into sharp relief areas where housing stock no longer matches the needs and benefit entitlements of those seeking to be rehoused. Some local authorities lack suitable accommodation for demographics currently presenting as homeless.

Recent welfare reforms can make it more difficult to source affordable general needs homes. In some areas, private rents have risen to outstrip local housing allowance altogether. Single adults may find themselves trapped in temporary accommodation when most social housing has been designed for families. Conversely, larger households face difficulties in areas where more recent housing strategy has sought to avoid underoccupation charges by supplying smaller homes.

Resulting bottlenecks in temporary accommodation cause longer waits for housing. Shortages can lead to rising use of bed and breakfasts and hostels out of the local area. An increase in specialist supported facilities could address this issue.

## Proposed improvements

*Effective partnership working* ~ The Duty to Refer does not always deliver longer-term benefit to the referee, as its current form does not add up to a coordinated approach. Were an outcome-focused **Duty to Cooperate** to replace it, timely collaboration could become the norm.

*A robust and reliable service network* ~ **Homelessness Reduction Boards** are needed to monitor the effectiveness of partnerships charged with a Duty to Cooperate. The Boards would present a much-needed forum to identify and address gaps in support provision; and to hold local agencies to account where agreed outcomes are not delivered. Given appropriate statutory powers, where necessary the Board could dis-instruct failing agencies and select alternative service providers to replace them, to ensure that local needs are met.

Existing housing stock and services may not reflect applicants' current needs and benefit entitlements. **Ringfenced revenue funding for essential support services** would assist increased flow from homelessness into settled independence.

*A truly person-centred approach* ~ The Act would be more adaptive to the needs of vulnerable groups if its **local connection exemptions** for cases such as domestic abuse were applied flexibly to other demographics. These could include care leavers, and those being supported back into independent life after leaving institutions such as prisons.

Greater scope to adapt the Act to local need would also divert resources away from unproductive **administrative procedures**. The requirement to set a personal action plan is often unsuited to individuals with more complex needs. Using an action plan as an optional tool, for those with greater capacity to follow it, would free up staff time to offer more help to those less able to act independently.