

Ending Rough Sleeping in Hammersmith & Fulham

**Report of the Hammersmith & Fulham Rough
Sleeping Commission**

November 2017

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Foreword

Jon Sparkes, Chair of the Commission

Rough sleeping is the sharpest end of the housing and homelessness crisis. It ruins lives, leaving people vulnerable to violence and abuse, and takes a dreadful toll on their mental and physical health. This is no way for anyone to live.

Since 2010 the number of people sleeping rough has doubled. Recent Crisis research has shown that without significant policy change, the current number of rough sleepers across Great Britain – 9,100 – is set to rise by 76% of the next decade.

But we know this is not inevitable. In this country, in the 21st century, we really should be able to work together to tackle this. That's why I was delighted to be asked by Councillor Sue Fennimore to chair this Commission on ending rough sleeping in Hammersmith and Fulham.

The Commission was tasked with the ambitious, but realisable, goal of reducing the number of people sleeping rough in borough to zero. I am pleased to present a robust set of recommendations that focus on shifting services more heavily on prevention and investing in a personalised housing led approach. Grounded in the experience of rough sleepers and people who deliver services in Hammersmith and Fulham, I am confident that these recommendations will help the borough achieve their goal and act as a model for other London local authorities and the Greater London Authority.

I would like to thank the Commissioners for their hard work in bringing this report together as well as all those who gave evidence. In particular, I would like to thank the 108 people sleeping rough in Hammersmith and Fulham who were interviewed. Their insight and experience has been central in shaping this report.

With the Homelessness Reduction Act coming into force next Spring, I urge Hammersmith and Fulham to take these recommendations forward to end rough sleeping in the borough for good.

Message from Cllr Stephen Cowan, Leader of Hammersmith & Fulham Council

When I became Leader of the Council in 2014, this administration and I were determined to do things differently, to do things *with* people rather than *to* them. Social inclusion is at the heart of *everything we do*, this requires working with all the right people to co-produce solutions, including our residents and service users as well as respected experts in their fields.

We will continue to come up with radical new ways of working and not doing things in the way they were done before and as others continue to do.

To inform our decision-making we have established a number of commissions that truly engage local residents to shape policy development and service improvement. The great work being done by our commissions will provide sustainable longer-term positive outcomes for our communities.

I am especially proud that this council seeks to serve all our communities regardless of their background and life chances, whatever their needs or vulnerabilities and I very much look forward to the successful delivery of the Rough Sleeping Commission's recommendations, which will make a great impact locally and across London.

I am extremely grateful to the chair Jon Sparkes, all the other commissioners and colleagues from Crisis for all the hard work they have put in. This report is a testament to their determination to improve the lives of people who have nowhere to sleep.

Message from Cllr Sue Fennimore, Deputy Leader of Hammersmith & Fulham Council

I am really pleased to have been able to champion this Commission and I commend and thank the commissioners for their dedication in freely giving up their time to debate policy issues, to research current evidence and good practice and to produce this forensic report with firm recommendations for action.

We do not want anyone to have to sleep rough in this borough and we will strive to achieve this by working with all our partners and lobbying at the highest levels.

Introduction

H&F Council is committed to significantly reducing the number of people rough sleeping in the borough and preventing people from sleeping rough in the first place. The Rough Sleeping Commission was established to help meet this vision by developing ground-breaking new policies with the goal of reducing the number of rough sleepers to zero.

Rough sleeping has risen significantly across the country since 2010. According to the Department for Communities and Local Government (DCLG) survey figures, an estimated 4,134 people slept rough on a snapshot night in 2016 across the country. This represents an increase of 16% on the previous year's figure of 3,569, and more than double the 2010 figure. London accounted for 23% of the England total (960). In 2016/17, 246 people were seen sleeping rough in the borough¹ over the year, compared with 241 in 2015/16 representing an overall increase of 2%.

This expert led Commission was chaired by Jon Sparkes, Chief Executive of the national homelessness charity Crisis and its membership included homelessness organisations within H&F. The membership was as follows:

- Michael Angus, Director, Barons Court Project
- Michael Buraimoh, Operations Director, The Upper Room
- Steven Platts, Senior Project Manager, Glass Door
- Thomas Neumark, Chief Executive, The Peel Institute
- Paul Doe, Chief Executive, Shepherd's Bush Housing Group²

The H&F Rough Sleeping Commission set out to:

1. Review and identify areas of good practice in services provided to rough sleepers and those at risk of rough sleeping in London, the UK and internationally.
2. Review the current H&F service against available good practice and identify gaps in current provision.
3. Formulate recommendations for interventions and/or service redesign, to deliver better outcomes for people that are rough sleeping in H&F, to support those at risk of rough sleeping and to reduce the number of rough sleepers down to zero.

Terms of Reference

- Identify the scale and nature of rough sleeping in H&F using available data and intelligence.

¹ CHAIN Annual Report Hammersmith & Fulham, April 2016 – March 2017.

² (*Matt Champion, joined the Commission in June 2017 as a representative of the SBHG in place of Paul Doe who retired from this position).

- Conduct a review of the available literature on rough sleeping, drawing on studies and commissions from elsewhere in London and the UK, and, where directly relevant, internationally.
- Call for written evidence from leading experts, policy makers and practitioners and explore this through a series of thematic oral hearings.
- Call for evidence from local third sector, council funded and independent service providers including those providing services to those at risk of rough sleeping.
- Obtain evidence from residents who have interacted with the Council's current rough sleeping services and who are part of the Housing First pilot.
- Identify key principles on which to base services for rough sleepers and those at risk of rough sleeping.
- Make recommendations to the Council on how best to support rough sleepers and prevent those at risk of becoming rough sleepers.
- Propose interventions and potentially service redesign for implementation locally, or more widely, that will help people that are rough sleeping.

The Commission met every month, supported by lead council officers and experts in the field.

The Commission was launched in January 2017 and immediately embarked on a literature review of international, national and local evidence which explored issues and best practice in London, the UK and internationally, maintaining its focus on the relevance of this data to H&F. The evidence gathered enabled the Commission to build an accurate picture of why people sleep on the streets in H&F.

Alongside the literature review, the members of the Commission wanted to see as much face-to-face service delivery in all parts of the system. Therefore, the Commission arranged to shadow and visit services within H&F and across London. This included accompanying St Mungo's outreach workers from the Shepherd's Bush Centre, as well as visiting services such as the Fulfilling Lives Housing First Pilot in Islington and Camden, the No First Night Out Pilot (NFNO) in Tower Hamlets and the European Campaign to End Street Homelessness in Croydon.

In April and May a call for written evidence was launched to gather the views of external experts in the field and to identify examples of good practice that might inform the Commission's recommendations. The Commission assessed the formal evidence and drew conclusions from the literature review, the assessment of services in H&F, the data and the written evidence received. This went on to inform the verbal evidence session which took place in June. The Commissioners took verbal evidence from key stakeholders and experts on the causes and potential solutions to rough sleeping in H&F. This included an opportunity for anyone delivering formal or informal, commissioned or non-commissioned services within and outside of the Council such as third and voluntary sector services and faith-based groups.

A key element of the Commission's work was to hear directly from people who are, or are at risk of, sleeping rough in H&F. Groundswell³ were commissioned to conduct a peer-led research project with the aim of enabling people with experience of homelessness to contribute to the Rough Sleeping Commission. The study engaged 108 people who are currently homeless and who have experience of rough sleeping in H&F in the last year using focus groups and one to one survey based interviews.

The Commission held a Frontline Worker session in June with the purpose of bringing together staff from projects in H&F that work with people who have experienced rough sleeping to explore the causes and solutions to homelessness.

From July to September, the Commission began to shape and formulate its recommendations having gathered a wide range of evidence. This involved reviewing the draft report to understand which recommendations could be implemented with immediate effect, which needed further work and which need to be implemented over a period of time to fit in with commissioning cycles and budget considerations. Finally, the Commission made an assessment about which recommendations sit outside H&F's remit and will therefore need to be the subject of regional and national lobbying.

³ Groundswell is a registered charity that supports homeless and vulnerable people towards independence with client involvement at its core enabling people to have a greater influence on services by delivering innovative projects which put homeless people at the heart of solutions.

The Commission's vision for H&F to tackle rough sleeping

We believe that for H&F to achieve its vision of reducing the number of rough sleepers to zero it is vital that there is a:

- **Stronger focus on prevention** with all organisations and services that come into contact with someone who might be at risk of rough sleeping playing their part in working in a coordinated and joined up way to ensure that people do not rough sleep. Preventing homelessness is the most effective way of ending homelessness, whilst being the most cost-effective intervention.
- **Move from a hostel by default to a housing by default model** to ensure that people are able to access settled accommodation as rapidly as possible and move on from homelessness.
- **A more tailored and personalised approach** with a strong emphasis on developing services around the needs of rough sleepers. This should be accompanied by a tailored wrap around package of personalised support dependent on the level of need.
- **A better co-ordinated emergency response** to ensure that no one is forced to sleep rough. The commission recommends the provision of a 'crash pad' for people who face barriers to accessing hostels and to extend the commission of the street legal service for people with no recourse to public funds.
- **Strategy to mitigate against the effects of welfare reform** including the implementation of Universal Credit, such as the 6-week waiting period and Direct Payments. For the Council to collaborate with other local authorities and work with the Greater London Authority (GLA) in lobbying national government.
- **Adequate supply of secure, accessible and affordable housing** for rough sleepers or people at immediate risk of rough sleeping. The commission recommends that the Council procure more properties in the Private Rented Sector (PRS) to be made available through the Social Lettings Agency (SLA) and ring fence a proportion of social housing.

What do we already know about rough sleeping in H&F?

246 people were seen rough sleeping in the borough

In 2016/17, 246 people were seen sleeping rough in the borough⁴, compared with 241 in 2015/16, representing an overall increase of 2%. A similar trend can be seen across London boroughs in this period. Sixty-one per cent (151) of people seen by outreach teams are new to rough sleeping (flow) and were not seen prior to 2016/17. Twenty-eight per cent (68) of people were also seen sleeping rough in 2015/16 (stock). Eleven per cent (27) of people had previously slept rough, and had now returned to the streets. (returners).⁵ This indicates that if there had been an intervention in place, it may have broken down.

81% (123) of people who were new to the streets did not sleep rough for a second night

The high proportion of people who did not go on to sleep rough can likely be linked to the success of the No Second Night Out (NSNO) project and suggests that this is potentially an effective intervention for people who are new to rough sleeping. However, despite this success, there are still 50% (123) of the total, who continue to sleep rough for longer periods of time.⁶ This might include those that do not qualify for the NSNO offer, for example, people that are already rough sleeping and have done so for a long period, or rough sleepers that are worried that contact with NSNO will mean a reconnection back to their originating country.

In the last year the proportion of new rough sleepers coming from short to medium term accommodation rose by 3.5%

The proportion of new rough sleepers coming from short to medium term accommodation hostels, asylum support accommodation and temporary accommodation (non-local authority and local authority) rose by 3.5%.⁷ This is a higher proportion compared the rest of London where overall the number increased by 2.3%.⁸ This figure relates to people who have been evicted from their accommodation or have chosen to leave. It is unclear as to why there has been an increase in people returning to rough sleeping from short to medium-term accommodation. Alongside this figure there has been a 5.7% decrease, since last year, in the number of new rough sleepers

⁴ CHAIN Annual Report Hammersmith & Fulham, April 2016 – March 2017.

⁵ The flow, stock and returner model categorises people seen rough sleeping in the year according to whether they have also been seen rough sleeping in previous periods.

⁶ CHAIN Annual Report Hammersmith & Fulham, April 2016 – March 2017. 2.3. Rough sleeping volume: Flow, stock, returner model.

⁷ CHAIN Annual Report Hammersmith & Fulham, April 2016 – March 2017. The short to medium term accommodation subtotal 12% compared to 8.5% 2015-2016.

⁸ CHAIN Annual Report Greater London, April 2016-March 2017. The short to medium accommodation subtotal 10.8% compared to 8.5% in 2015-2016.

that are coming from long term accommodation in H&F.⁹ This decrease is also reflected across London.¹⁰

Growth in new rough sleepers who have been asked to leave or been evicted, alongside a reduction in the number of people struggling financially

According to the Combined Homelessness and Information Network (CHAIN is a multi-agency database recording information about rough sleepers and the wider street population in London) data, the proportion of people who have been asked to leave or evicted from their accommodation has risen from 32.5% in 2015/16 to 38.09% in 2016/17. Simultaneously, there has been a reduction in the number of people reporting financial problems, in the form of job losses and debt problems, as a reason for leaving their accommodation.

It is not clear from the CHAIN data, what type of accommodation people are being evicted or asked to leave from. However, there is a general trend across London and England showing that the leading cause of homelessness is the ending of an Assured Shorthold Tenancy (AST) in the private rented sector. The proportion of households accepted as homeless by local authorities has increased from 11% during 2009/10 to 32% during 2016/17.¹¹ In London, the proportion has increased during the same period from 10% to 39%. In England, the ending of an AST accounts for 74% of the growth in households who qualify for temporary accommodation since 2009/10.¹²

“You still want a reasonably secure tenancy, not one of these short-term contracts...At the whim of the landlord. And in horrendous conditions. I mean some of the slums I have seen.” Groundswell Focus Group Participant

This indicates that affordability is an increasingly significant issue as more households facing the end of a private tenancy are unable to find alternative accommodation without assistance. Since 2010, the cost of accommodation in the PRS has risen three times faster than earnings across England. In London, the increase was eight times higher.¹³

The Joseph Rowntree Foundation links the increasing eviction rates to the overall growth of the PRS and caps to Local Housing Allowance rates with the greatest impact being in London and across other high-pressure areas. Anecdotally, people are being asked to leave or evicted because their accommodation is in a high demand area and a landlord can accrue more rent for the property. Due to the use of ‘no-fault’ Section 21 (S21) Notice of Possession, there is very little that can be done to prevent that from

⁹ CHAIN Annual Report Hammersmith & Fulham, 2016-2017. Long term accommodation subtotal 44% compared to 49.7% in 2015/16.

¹⁰ In 2015/16 the long-term subtotal in Greater London stood at 56.6% compared to 52.4% in 2016/17.

¹¹ The National Audit Office report by the Comptroller and Auditor General on Homelessness, September 2017.

<https://www.nao.org.uk/wp-content/uploads/2017/09/Homelessness.pdf>

¹² DCLG (2017) Statutory Homelessness and Prevention and Relief Statistical Release, January to March 2017.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/621556/Statutory_Homelessness_and_Prevention_and_Relief_Statistical_Release_January_to_March_2017_corrected.pdf

¹³ The National Audit Office report by the Comptroller and Auditor General on Homelessness, September 2017.

happening, because tenants have no grounds to challenge this (unless the notice has been served incorrectly).¹⁴ The Joseph Rowntree Foundation report on evictions and forced moves states that over four-fifths (83%) of the increase in repossessions in recent years can be attributed to the increasing use of 'no fault' evictions with the most common reasons being that the landlord wanted to raise the rent, sell or live in the property or 'revenge' evictions and rent arrears.¹⁵

Anecdotally, from the verbal evidence session, a particular concern was raised by the H&F Law Centre that a housing association (now known as a registered providers of social housing) had been using Section 8 of the Housing Act 1988 for mandatory grounds for eviction for rent arrears or previous anti-social behaviour. However, Ministry of Justice (MoJ) Mortgage and Landlord Possession Statistics in England and Wales, shows that the figure of evictions by social landlords, such as housing associations, fluctuates each year and the general trend has been a decrease in the proportion of social landlord claims from 83% in 1999 to 62% in 2015. Whereas, the proportion of private landlord claims increased from 9% in 1999 to a peak of 17% in 2010.¹⁶

Numbers of UK nationals rough sleeping has increased and Central and Eastern European (CEE) nationals has decreased in the last year

In line with the general trend across London, the percentage of UK nationals rough sleeping increased by 12% over the last year.¹⁷ The percentage of CEE nationals has decreased by 13.9% in H&F. Historically, there has been an increasing number of CEE nationals rough sleeping within the borough.

The Commission thinks that a recent change in Home Office policy on European Economic Area (EEA) administrative removals and significant changes in UK net migration are potential factors contributing to the decrease of CEE nationals sleeping rough in H&F. The experiences gathered from frontline workers in H&F attribute the decline to people with an insecure immigration status evading outreach services rather than being reconnected to their country of origin.

Previously, a CEE national living in the UK would be in breach of their treaty rights and reconnected to their country of origin if they were unemployed or unable to provide proof of employment or any prospect of work. However, since the change in policy, rough sleeping is now a category deemed to be a breach of treaty rights and enforcement agencies have the right to serve administrative removals, regardless of

¹⁴ A 'Section 21 Notice of Possession' operates under section 21 of the Housing Act 1988, is the legal eviction notice template a landlord can give to a tenant to regain possession of a property at the end AST.

¹⁵ Clarke, A., Hamilton, C., Jones, M. and Muir, K. (2017) Poverty, evictions and forced moves. Joseph Rowntree Foundation.

¹⁶ Ministry of Justice (MoJ) Mortgage and Landlord Statistics: January to March 2016.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/522479/bulletin-jan-march-2016.pdf

¹⁷ CHAIN Annual Report Greater London, April 2016 - March 2017.

whether they are otherwise exercising treaty rights.¹⁸ The Home Office policy data around the removal of rough sleepers is not currently available and without this we cannot determine the demographics and number of those people being returned to their country of origin because of this policy change.

The latest UK net migration figures to be released from the Office for National Statistics indicate from year ending March 2016 to year ending March 2017, there was a significant decrease in net migration of EU citizens, particularly from EU8 countries. This trend might also be contributing to the decreasing numbers of CEE nationals sleeping rough in H&F.

¹⁸ Home Office (2017) European Economic Area (EEA) administrative removal. Version 3.0. Instructions for assessing whether to administratively remove a European Economic Area (EEA) national (or a family member of an EEA national). https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/590663/GI-EEA-admin-removal-v3.pdf

What are rough sleepers telling us?

The findings in this section have emerged from the focus groups and one-to-one survey based interviews conducted by peer researchers from Groundswell. The research engaged 108 people who are currently homeless and who have experience of rough sleeping in H&F.

No one wanted to sleep rough

There was a strong message from the Groundswell research that no one interviewed wanted to sleep rough. Participants were asked what it would take to help them move away from rough sleeping and the most common response was to have a home, two thirds mentioned (affordable) accommodation.

“Give people a guarantee of accommodation, people need stability. Affordable accommodation.”
Groundswell Focus Group Participant

Only two people out of the 108 homeless people interviewed wanted to live in a hostel

Groundswell strongly recommended in its research the decommissioning of some hostels and a move away from a hostel by default to a housing by default system. They cited in their findings that only two people out of the 108 participants wanted to live in a hostel. Principally participants wanted a home and thought that was the solution to their homelessness.

“We all want to be in a place where we can just be at home...we just want the basics, we want a home. That is what we want.” Groundswell Focus Group Participant

The current level of support provided, despite the resourcing, is not meeting need

The current level of resources and services within the borough were described as adequate, however, the way the services were being designed, from the experiences of those participants in the focus groups, were not necessarily meeting the needs of those rough sleeping. For example, almost all of the participants had used a day centre and commonly acknowledged the pressure homelessness services were under due to funding cuts. They also explained that staff based in day centres were often less able to support them. In particular, that the reduction in operating hours of St Mungo’s Broadway Day Centre to one hour a day may be a barrier to rough sleepers who want to access services, such as showers, food and a place to charge phone, earlier or at other times.

The benefits system is perpetuating homelessness

Half of the participants in the Groundswell research had experienced difficulties with the benefits system, and for some this had been a trigger for them becoming homeless. Sixty-two per cent highlighted that the most common problem was the delay

in benefit payments; 35% reported that their benefits had been stopped and 35% identified unhelpful staff at the job centre.

“It was between me the housing and the job centre and I didn’t get help till on the street. JSA Advisor thought I would be ok but housing benefit was stopped cos of sanction.” Groundswell Survey Participant

Difficulty searching for work and attending appointments whilst rough sleeping meant that sanctions were common. Participants from the Groundswell research also reported concerns around the administration of Universal Credit (such as direct payments), particularly for people who have drug and alcohol misuse support needs.

“Well there was a change in my housing benefits, I don’t know why. And all of a sudden actually after six weeks you get a letter. It’s not actually that they say. Because I phoned them and I said listen there is a change in my circumstances. Alright Mr [unclear] you go to the council over at the town hall. They don’t know anything. After six weeks they actually sent me a letter and they said you are not entitled anymore for housing benefits. Although I earned just £20 or £30 actually more a month. And there we go. Six years actually in a one-bedroom flat. And now I am on a bench in a cemetery.” Groundswell Focus Group Participant

Key findings

We can end rough sleeping in H&F

Reflecting on what the Commission has learnt from the literature review, there is a wealth of evidence from services that have worked to dramatically reduce rough sleeping. In most circumstances, this success has been accompanied or driven by a concerted effort from national government. For example, the establishment of the Rough Sleepers Unit saw a dramatic decrease in rough sleeping at the end of the 1990s and 2000s. Housing First is also an important component to add to this suite of interventions that can end rough sleeping as an evidence-based approach supporting homeless people with high needs and histories of entrenched and repeat homelessness, including rough sleeping.¹⁹ The Housing First model is currently being piloted in H&F. The Commission also took evidence on housing led interventions that work to support people with lower support needs.

Hostels are not always conducive to people moving on from homelessness

Rough sleepers interviewed in the Groundswell research described the hostel environment as being very chaotic, with people who have high levels of support needs. Research participants with lower support needs felt they would be resistant to moving into temporary accommodation, like hostels, because of the effect that this would have on their ability to exit homelessness.

“It is a little bit of an oxymoron, because you have got to understand that a lot of the people who have substance misuse issues and alcoholism, these people have chaotic lifestyles. And if one person has got a chaotic lifestyle, imagine what 20 people is going to be like in one enclosed space. And then you get the people who are nice and who don’t have issues and get thrown into that, it’s like oh my god what is going on here.” Groundswell Focus Group Participant

Welfare reform is making it much harder to resolve someone’s homelessness and for people to sustain tenancies

Implementation of Universal Credit

The Universal Credit seven day waiting day period combined with the six week assessment period and delays in the housing element of Universal Credit before an initial payment is paid is having serious consequences for claimants maintaining their rent and bill payments and is the cause of many tenants’ arrears.²⁰ This was highlighted strongly in the Groundswell research and in the Frontline Worker session as an issue for rough sleepers and as a trigger factor causing rough sleeping in H&F.

¹⁹ Literature Review.

²⁰ Foley, B. (2017) Delivering on Universal Credit Citizens Advice Bureau.

<https://www.citizensadvice.org.uk/Global/CitizensAdvice/welfare%20publications/Delivering%20on%20Universal%20Credit%20-%20report.pdf>

Sixty-two per cent of the Groundswell participants highlighted that the most common problem was the delay in benefit payments. For some, delays in first payments had failed to prevent people becoming homeless after losing their job.

“It was between me, the housing and the job centre and I didn’t get help till on the street. JSA advisor thought I would be ok but Housing Benefit was stopped cos of sanction.” Groundswell Survey Participant

Research has shown that in 2016, 73% of Universal Credit claimants surveyed in council and arms-length management organisations were in rent arrears because of the six-week assessment period, whilst 40% of tenants were not in arrears prior to moving onto Universal Credit.²¹ On average, 42% of households in London owe approximately five weeks’ rent arrears. Difficulties associated with claiming Universal Credit whilst rough sleeping and sanctioning of rough sleepers were also factors highlighted by the Groundswell research, frontline workers and the H&F Link Service.

“What we have experienced with Universal Credit is if somebody fails to attend an interview or work commitment interview or ID verification interview, they simply stop the benefit without letting us know, but landlords like us, other associations, local authorities and even private sector landlords they haven’t got a clue, they are waiting for nothing. So, from the point of view of welfare reform and benefit access, I think it is crucial that we work together” H&F Link Service

The introduction of the new method of payments has caused concern amongst people specifically around tenancy sustainment as the housing element of Universal Credit is not necessarily paid directly to their landlord. Participants from the Groundswell research felt that this would lead to rising levels of homelessness.

“But I don’t agree with this [Universal Credit] being paid...the rent into your account. Because that is like telling...that is basically they are blatantly telling you we want you to be homeless. We don’t want you to live in a house. Even people who have got somewhere to live, they don’t want their-like people who have got somewhere to live, the Housing Benefit is being paid, they might have a drink problem or a drug problem or something like that. You put £1000 in their account...way! It’s party time, they don’t care.” Groundswell Focus Group Participant

Capping and freezing of Local Housing Allowance rates

There are also significant issues arising from the capping and freezing of Local Housing Allowance (LHA) rates, particularly around finding affordable accommodation for people living within the borough. The LHA is used to work out the amount of Housing Benefit an individual is entitled to. The National Federation of ALMOs (Arms-length Management Organisations) welfare reform report in 2017 and others found that the LHA and the benefit cap was having an impact on a person’s ability to sustain

²¹ Birchall, L. (2017) Pause for Thought: Measuring the impact of Welfare Reform on tenants and landlords, 2017 Survey Results. National Federation of ALMOS and ARCH.

their accommodation. The Valuation Office Agency calculations on the monthly shortfalls between LHA rates and 30th percentile local rents for 2016/17 show that for the broad rental market area of Inner West London a room £32, one bed £178, two bed £160, three bed £333 and four bed £786.²²

***“Cost of living. LHA shortfall can be £200-£300 in H&F, people have to make up that shortfall.”
Frontline Worker, in response to ‘what are the factors that cause people to rough sleep in the borough of H&F?’***

The 2017 National Audit Office report on homelessness highlights that freezing LHA rates has caused a shortfall between the amount of Housing Benefit claimants receive and market rents, and that this has very likely contributed to the rise in homelessness since 2010.²³ As a result, tenants have needed to find additional income or move to a more affordable home. In Central London, there is an average shortfall of around £371.

Extension of the Shared Accommodation Rate

“...I think the guidance should be clearer so that people would be clear in terms of the parameters of the exemption because sometimes it is open to interpretation...” H&F Link Service

The capping and freezing of LHA, coupled with the extension of the Shared Accommodation Rate (SAR), has reduced the amount of affordable and accessible housing options for young single people under 35. In theory if you are living in a hostel you should be exempt from the SAR. However, due to the technical definition of hostel accommodation, it is often difficult to secure this exemption as it can be interpreted differently, or the Department for Work and Pensions (DWP) are not aware of someone’s accommodation status. If a rough sleeper is under 35 and is not exempt from the rule, they are not entitled to claim benefits based on one-bedroom self-contained accommodation.

“In terms of this year’s accommodation rights, if the rough sleeper is under 35 and they are not exempt from the rules, they are not entitled to claim benefits based on a one-bedroom self-contained accommodation...there is a shortage of hostel accommodation for this group, and therefore for that reason there is limited access ...” H&F Link Service, Verbal Evidence Session

Suitability of move-on accommodation

The Groundswell research and the Frontline Worker session also raised issues around the suitability of PRS accommodation, specifically around the affordability, security and conditions of that accommodation.

²² Value Office Agency, the 30th percentile figures derived from twelve months’ worth of lettings information collected up to the end of September 2016. Table 5: Monthly shortfalls between LHA rates and 30th percentile local rents, by BRMA, in Clarke, A., Hamilton, C., Jones, M. and Muir, K. (2017) Poverty, evictions and forced moves. Joseph Rowntree Foundation, Poverty, evictions and forced moves, Joseph Rowntree Foundation, July 2017.

²³ The National Audit Office report by the Comptroller and Auditor General on Homelessness, September 2017. <https://www.nao.org.uk/wp-content/uploads/2017/09/Homelessness.pdf>

“You see it all the time. New apartments and flats. And you see them all the time. I mean obviously that is not something that we could get now because we can’t afford it. They say affordable housing but how can we afford it? How is it affordable to us?” Groundswell Focus Group Participant

The participants from the Groundswell research also raised issues around the limited move-on options that were available in hostels. The research highlights that the lack of move-on opportunities means that some people are unwilling to move into temporary accommodation.

“You speak to most people in the hostels they have been there for multiple years. Whereas in times gone by a year, 18 months or so. But now people have been four or five years and haven’t even had a chance to move on.” Groundswell Focus Group Participant

When participants in the Groundswell research were asked which type of accommodation they would like to move into, 64% hoped to move into social housing and only 14% into private rented. Participants felt that private rented accommodation was of poorer quality and that they faced the threat of retaliatory or illegal eviction.

Problems for people with no local connection accessing services

The lack of ability to prove local connection was identified as a key barrier to accessing statutory and non-statutory homelessness services in the Frontline Worker session. Despite having lived in H&F immediately prior to sleeping rough, 32% of survey participants from the Groundswell research struggled to prove local connection.

“Well at Hammersmith council the other week, I went up there and I went with one of the workers here [Day Centre]. And I have been in here, told them the situation like...they phoned me cousin up and she told them no. I don’t want him here, can’t live here. Nothing. So you’d think they’d help me. You know like. I got told to go back to Harrow train station. That was the council. They literally told me to go back on the streets. You know what I mean. I’ve got an illness. They didn’t want to know...I don’t think she had the right to say to me get back on the streets back to harrow train station. Back to where you come from. I think that is wrong that.” Groundswell Focus Group Participant

Frontline workers did say that services in H&F were very good in comparison to some other boroughs, however this meant that people travelled from other areas to access services, particularly day centres. Frontline workers also expressed concern around access to hostels for people who struggled to prove that they had a local connection. They described that it was cuts that had led homelessness services to require a higher burden of proof of local connection.

Problems for people with No Recourse to Public Funds and EEA nationals who are sleeping rough

There are winter night shelters operating in H&F, such as Glass Door, which offer open access provision that provides a place for people with no recourse to public funds (NRPF). During the winter months (November – March), a series of winter shelters

open in locations within H&F and neighbouring boroughs. These are organised by charities and faith-based organisations and use local churches to provide rough sleepers with overnight protection from the elements. Services such as Glass Door have identified that the people using these shelters predominately have NRPF or are otherwise inappropriately or tentatively housed. The winter shelters are usually full and in the last couple of years Glass Door have operated a waiting list. Winter shelters are not long term, stable or independent forms of accommodation; they are emergency respite centres.

The Street Legal model already exists in H&F and is funded by the GLA, with bed spaces peppered across London. St Mungo's provide the bed spaces alongside Praxis to give legal advice to help people to move on. By commissioning two services together, this allows for partnership working between the migrant and homelessness sectors, providing a route out of rough sleeping by resolving their immigration status, securing necessary documentation, housing or other support during and following the process.²⁴

“Without access to immigration advice, housing, food, the people we support have no chance of resolving their status and moving out of destitution.” Street Legal Staff Feedback

These are important parts of the solution; however, they are not sustained and systemic. The common theme in all the responses from the Frontline Worker session was that there was generally lack of support for asylum seekers and EEA nationals. Frontline workers responded that people with an insecure immigration status will often not bed down at all, preferring to sleep in the day, for fear of the consequences.

Missing opportunities to end homelessness for people at risk of rough sleeping

The Groundswell research showed that 66% of the people they interviewed had been in contact with Housing Options following their current experience of homelessness before they slept rough.²⁵

“The council [need] to give more than the phone number to no second night out. They could have seen if I was healthy, asked what I needed and given accommodation. I had to sleep in the park for two weeks and no one from outreach called me.” Groundswell Focus Group Participant

Other services and public organisations, such as hospitals, GPs and probation that have capacity to identify people that are at risk of homelessness were also identified as having missed opportunities to prevent rough sleeping in H&F. The Groundswell research highlighted that 52% of the participants said that help to find or keep accommodation might have prevented homelessness. The Frontline Worker session highlighted that people would value more interagency communication around sharing information about different services that are available in the borough. The Homelessness Reduction Act will place a statutory duty on other public organisations

²⁴ Street Legal Partnership Advisory Group Report, July 2017.

²⁵This figure is not representative of just Housing Options in H&F but also encompasses Housing Option Units in other areas. A key issue for accessing support in H&F is people rough sleeping with no local connection.

to make referrals to Housing Options if someone is homeless or is at risk of homelessness. H&F estimates that the financial impact of the Homelessness Reduction Act implementation will result in an increase of demand and workload of at least 50% of the borough's Housing Options service. This will mean an increase in both staff resources and finance to meet the duties within the Act.

Cuts to support services

The Groundswell research and the Frontline Worker session also highlighted that support services were becoming harder to access and that funding cuts meant that the threshold for support is much higher. The Groundswell research highlighted the issue of 'priority need' criteria to access support services. Participants often felt they had been misjudged as not being 'vulnerable' enough and being turned away from services because they were not deemed a priority. Thirty-one per cent of research participants considered themselves to have a disability.

"It's getting harder now to actually book yourself into [Mental Health Support Service]. I would have done that a long time ago. I will be honest with you. They think you are not mad enough or whatever. You are not running around the streets naked and trying to jump on front of buses and stuff like that. You can't be suffering from depression or anything like that. Even though depression usually makes people jump off bridges and stuff like that. Which is something that mental health [service] should help you avoid. But they don't admit you for a simple thing like depression."

Groundswell Focus Group Participant

It is not just cuts to welfare and statutory/non-statutory homelessness services for rough sleepers which are having an impact on the ability of H&F to reduce rough sleeping, it is also cuts to wider support services. Participants in the Groundswell research felt that access to other support services such as counselling, debt/money management and drug and alcohol services would have helped to prevent them from becoming homeless. A common theme to come out of the Frontline Worker session and the Groundswell research was that cuts to legal aid, particularly tenancy related issues, were a contributing to homelessness.

"I don't have the money to defend myself [In Court], I have to rely on the public purse and at the end of the day if I had won anything, all that money would have gone back to the public purse but it...I know I should never have been evicted after fighting that man for such a long time. He wouldn't let me in to get my belongings, he got private bailiffs and dogs to get me out as if I was some sort of animal. No, he really had it in for me and I think that should not be allowed because it's...again, it should be illegal somehow. You know, private landlords it feels like they can come and beat you up."

Groundswell Focus Group Participant

Support services, including day centres, not providing flexible enough services

The Groundswell research highlighted that support services including day centres were not providing enough flexible services for people sleeping rough. Day centres in H&F are a valued resource in supporting people who are street homeless and

participants valued the way they met their day to day needs, for example being able to access showers, food and a place to charge phones.

However, participants reported that there was less support for clients than had previously existed in the borough due to cuts to funding and organisations running day centres needing to reduce opening hours. Staff were reported to be increasingly under pressure and could not provide the personalised and open-ended support that they had done previously. This was identified as a particular problem for people who had multiple and complex needs.

“So homeless centres yeah, they are primarily targeting homeless people on the streets, to get them off the streets. But most of them are opening up at 9 o’clock in the morning, office hours. We need for them to open at seven o’clock in the morning so we can get off the street early in the morning, get showered up and stuff and be out at nine o’clock looking for work and stuff. But if you go in there nine o’clock you are not going to be able to get out until about eleven o’clock. Open earlier.”
Groundswell Focus Group Participant

There is a lack of outreach staff, and existing staff have limited power to quickly access specialised services for rough sleepers

Eighty per cent of participants in the Groundswell research, who had contact with the street outreach workers, commonly reported they were ‘knowledgeable’ and ‘dedicated’. However, there was an awareness that they were limited in power to access services and participants reported slow response time and a lack of outreach staff on the street.

“Well in one way it’s not nice that they wake you up at one or two o’clock in the night. But in the other way they check on you and that is important because then you know...alright they don’t come every day around but at least you know somebody is looking after you. Somebody there [unclear] police or whatever it is. Of the people who sleep out on the street, it is never safe. And that’s a thing with an outreach worker, actually, you know someone is around.”
Groundswell Focus Group Participant

For example, they had limited access to accommodation and specialist addiction and mental health services

“Usually they come qualified and if they are not they are with somebody who is. So I can’t really tell an outreach worker what to do. Because I have found with outreach, one minute they have the power, the next minute they didn’t have the power at all. Example – one minute they were putting people in hostels next minute they weren’t able to put people in hostels.”
Groundswell Focus Group Participant

Section 1: Implementing a stronger prevention framework across a range of organisations in H&F

Adopt a 'No First Night Out' approach for those at risk of sleeping rough

There is strong evidence emerging from the No First Night Out (NFNO) interim report that the tri-borough project working across Hackney, Tower Hamlets and the City of London is working well to prevent homelessness. A key element of this pilot is the collection of detailed data from people who use the service and information on their journey into homelessness. The project conducted some research into risk factors associated with rough sleeping. Using this information, the borough could determine the most appropriate response to help end their homelessness.

The Commission recognise that the process of assessing levels of risk for someone at immediate risk of rough sleeping was based on statistically small numbers and is exclusive to people in their boroughs. However, the Commission found on a visit to Tower Hamlets that those people at immediate risk of rough sleeping did not leave Housing Options until they were accommodated which it found to be a powerful principle.

CASE STUDY BOX: No First Night Out

No First Night Out – Help for Single Homeless People is a tri-borough project, working across Tower Hamlets, Hackney and The City of London. The project, which is funded by the GLA, is working to develop new approaches to prevent individuals from sleeping rough for the first time. An important element of the pilot is the collection of detailed data from people who use the service and information on their journeys into homelessness. Using this data, the borough has been able to create typologies of new rough sleepers, which have been used to determine the most appropriate response to help end their homelessness.

Key findings:

- **24% of people, their primary needs were access to accommodation.**
- **24% of people, their homelessness was linked to support needs including drug used, offending, often combined with mental ill health.**
- **6% of people, their homelessness was linked to mental health and family problems. three quarters of people were placed in a B&B and a quarter of people stayed where they were and succeeded in prevention and that Housing Options staff felt empowered to support rather than just advise and could say 'yes' more.**

There are examples in H&F already of the NFNO approach being adopted for those at risk of rough sleeping. H&F have a number of projects starting based on NFNO principles with funding from the DCLG and in partnership with St Mungo's.

Homelessness preventions and evictions policy

There is also work to be done around evictions from social housing tenancies and the relationship between housing associations and early intervention and prevention.

The Commission is of the view that the Council needs to review its allocations policies to ensure rough sleepers are not unfairly excluded (e.g. because of time spent in prison or previous financial difficulty), and eviction policies to ensure accommodation is not lost.

Improve advice and information services

There was a very strong steer from the verbal evidence and Frontline Worker session that there was a lack of knowledge across key stakeholders of what services are available in the borough. Better communication is needed, for example, the police to be made more aware of what support services are available and to make it easier for frontline workers to know about the most appropriate service to refer to.

The Council is currently starting to review all its literature in advance of the Homelessness Reduction Act coming in to force. H&F has also made efforts to harness public awareness and has used the business improvement district to raise awareness with outreach teams leafleting and providing training. There is also a regular Homelessness Forum which hosts statutory and non-statutory homelessness organisations that operate within the borough and provides a platform to share information.

Develop community engagement and public support

Public awareness about homelessness and rough sleeping is important in prevention because it helps raises awareness and can promote services and interventions for rough sleepers.

Findings from recent research conducted by Crisis²⁶, show that public thinking about homelessness is significantly centred around individualism (the idea that a person's circumstances are shaped by their willpower, character and choices), related concepts of charity and morality, and the belief that the only solution to homelessness is direct remedial services such as clean beds and hot meals. Currently, homelessness is not thought of in the context of broader economic trends. When members of the public see people sleeping rough, read news stories about abused women living in refuges or hear about immigrants living in overcrowded housing, they don't make the connection to larger economic forces such as rising housing costs, wage stagnation and the unemployment rate. This individualism prevents people from thinking about solutions to preventing homelessness.

²⁶ O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom. FrameWorks Institute.

The Commission is of the view that partnership with the voluntary and public sector is crucial in order to build public understanding and awareness of homelessness and rough sleeping. The community can play a greater part in highlighting people they think are very vulnerably housed or at risk of homelessness.

The CRZero campaign in Croydon is an example of how to engage the community in raising awareness of rough sleeping and demonstrates the importance of community engagement in finding potential solutions and implementing them. There is still much to learn from the CRZero campaign as the engagement of the voluntary sector has just only just started.

Within H&F, work does go on between the high support need hostels and business, and there are other methods of communication being used. For example, Barons Court are using Nextdoor which is a new social networking app hosted by H&F, aimed at promoting community engagement and has proven to be a useful way of communicating with the local community. There is scope to build on this work constructively across the borough.

Formalise arrangements between prisons and housing teams

A recent report from the All-Party Parliamentary Group on Ending Homelessness highlighted that homelessness and or unstable accommodation is often associated with significantly higher levels of reoffending. MoJ research shows that 79% of people who were previously homeless were reconvicted in the first year after release compared to 47% who had accommodation prior to custody.²⁷ Out of the Groundswell participants, 42% said they had been in prison and 8% had been in a young offenders' institution. The report identifies that getting help from the local authority can be difficult for a prison leaver. There are also with applying for Universal Credit as claims cannot be made until a tenancy is secured.

In the first half of 2017/18, on average 15% of referrals to the Placement and Assessment Team for Homeless Singles (PATHS) for supported accommodation came directly from prisons and/or the probation service. During the same period, 3% of all households who approached the Council directly (i.e. who were not referred by a prison or probation), stated that they had recently been released from prison.

This demonstrates that a significant proportion of single homeless people have support needs around offending behaviour and have a housing need, so a focus on assisting people who are leaving the prison system is important to address homelessness amongst this group with a view to breaking the cycle of re-offending.

The borough already works closely with the probation service and prison housing teams. It is anticipated that the Homelessness Reduction Act will require the prison

²⁷ APPGEH (2017) *All-Party Parliamentary Group for Ending Homelessness: Homelessness prevention for care leavers, prison leavers and survivors of domestic violence*. London: Crisis.

and probation services to notify the local authority in advance about people known to them who are at risk of homelessness upon release, and that this will enable the Council to begin homelessness prevention and Housing Options work with people at a much earlier stage.

Recommendations:

For action by the Council

- **Ensure that everyone at risk of sleeping rough is accommodated by adopting a No First Night Out approach.** Based on the evidence taken from the No First Night Out project in the London Boroughs of Hackney, Tower Hamlets & the City of London Corporation, the Commission recommends that H&F implement a similar approach based on research about the routes into homelessness for various cohorts. The overall aim of this approach should be to ensure that anyone at risk of sleeping rough is provided with some form of temporary accommodation, and no one in this situation is turned away by the local authority without having their homelessness resolved. As well as those at risk of sleeping rough, this offer should be made to people already rough sleeping. To support the delivery of this approach, H&F should invest in training for frontline housing and homelessness teams to ensure that they are applying a personalised and creative approach to tackling homelessness.
- **Involve the public in tackling rough sleeping.** There are numerous places that people go when they are sleeping rough or are at risk of sleeping rough, but where they are not currently able to access housing advice. These might include places of worship, libraries and GP practices. The Council may wish to hold a 'Rough Sleeping Hackathon' involving community and voluntary organisations to engage the public around raising awareness of rough sleeping and involving them in generating and implementing solutions. This would also help ensure these organisations and individuals across the borough are better able to sign post people to the appropriate advice and services. The H&F Homelessness Forum could be used as the vehicle to engage the community, voluntary and faith sector.
- **Ensure no one sleeps rough when they leave prison by working jointly with local prisons and probation teams to review existing referral systems and processes.** In the run up to the introduction of the Homelessness Reduction Act, H&F should look specifically at how prisoners are identified as having a housing need and how they are referred to the prison housing teams well in advance of their release date.

- **Provide urgent support to private tenants who are at risk of sleeping rough.** H&F should ensure that tenants who are renting privately and deemed at risk of rough sleeping or losing their home can easily access Discretionary Housing Payments (DHPs), whether this be through targeted promotion to tenants and landlords or through the SLA. There has been a significant increase in PRS rents, which is leaving a shortfall that cannot be met by any other intervention. H&F should review internal processes to ensure that anyone approaching the Council who is facing financial difficulty, regardless of which team they approach (e.g. Housing Benefit, Housing Options or council tax), should be assisted to make an application for a DHP if they are at risk of, or have already accrued, rent arrears.
- **Ensure that people are not made homeless as a result of being evicted from social housing.** H&F should carry out a full review of housing association and council eviction policies to ensure accommodation is not lost. H&F should work with housing providers in the borough to put in place effective early notification and response arrangements where housing association tenants are at risk of tenancy failure and to ensure that a joint landlord/Housing Options approach is adopted to working with the tenant to prevent homelessness. This might include referral to routine multi-agency panel meetings to review cases and develop person-centred plans to prevent homelessness in individual cases.

For action by the GLA and regional bodies

- **The GLA should put in place a pan-London approach to protect people who are homeless from having their benefits sanctioned.** The GLA should help coordinate the DWP, local Jobcentre Plus (JCPs) and London local authorities to work together to offer protection from sanctioning for people rough sleeping or at immediate risk of homelessness. There must be a contactable link within the DWP who has the power to halt or change a sanctioning decision and a process whereby the local authority is notified prior to sanctioning to check someone's current housing and welfare status. The effect of sanctioning has been identified as both a cause and contributory factor of homelessness.
- **The GLA should ensure that sufficient help is put in place for people moving onto Universal Credit.** As Universal Credit is rolled out across London, the GLA should help facilitate the work between London local authorities and JCPs to ensure that vulnerable groups are properly supported to move onto Universal Credit. This work should focus specifically on ensuring that JCPs are well connected to local housing and homelessness teams and flagged as quickly as possible if there is any risk of homelessness so that the appropriate support package is put in place.

- **The GLA should ensure that everyone at risk of sleeping rough is accommodated by supporting all London local authorities to adopt a No First Night Out approach.** A pan London adoption of this approach will help to ensure that no one council is overburdened by high demand.

For action by the Government

- **The Government should increase the level of funding needed to successfully implement the Homelessness Reduction Act.** The current level of funding is not sufficient for the local authority to meet the increased level of demand. H&F estimates that the financial impact of the Homelessness Reduction Act implementation will result in an increase of demand and workload of at least 50%.
- **The DWP needs to work better with JCPs to ensure that they have better training, and understanding of, homelessness and housing related matters and the consequences of sanctioning someone who is homeless.** Training for work coaches on housing issues should be integral in this awareness raising.
- **The MoJ should obligate prison Governors to introduce integrated transition plans for all prisoners and introduce measurable housing outcomes for Community Rehabilitation Companies (CRCs).** This will ensure that prisoners are fully supported upon their release from prison.

Section 2: Emergency Response

Support for people forced to sleep rough

In addition to a strong prevention framework, H&F must also ensure that there is a robust emergency response for people who find themselves sleeping rough. This is particularly the case for people who do not qualify for a NSNO offer or have difficulties accessing current hostel provision.

There was strong acknowledgement from rough sleepers in the Groundswell research that outreach workers provided valuable support. The Commission visit with the St Mungo's outreach team and evidence from the verbal and Frontline Workers session reiterated the importance of this resource. It also highlighted that workers were often stopped from providing support because of NSNO specifically targets new rough sleepers rather than those with more entrenched needs. It was also clear that outreach workers were not sure what services they could access to support people with acute mental health or drug and alcohol difficulties on the street.

Personalised and robust support for rough sleepers

Participants in the Groundswell research and frontline workers both spoke of the pressure day centres are under and reported that staff do not have enough time to provide personalised support. People felt that the day centre hours did not fit around the life of someone sleeping rough. Frontline workers recommended that rough sleepers should be involved in the commissioning process to offer important insight into the needs of those that use the day centres.

Support for people without recourse to public funds to support their housing

During 2016/17, when met with H&F's outreach team, 48 (19%) rough sleepers were recorded on CHAIN with NRPF. Ninety-five (39%) rough sleepers' status was not known or recorded. It is the view of the Commission that if H&F wants to meet its goal of reducing rough sleeping to zero then the needs of those rough sleepers without recourse to public funds must be addressed. Rough sleepers with no recourse to public funds are unable to access benefits or housing assistance due to their immigration status.

There are winter night shelters operating in H&F, such as Glass Door which offers open access service, providing a place for people with NRPF to sleep. This is an important resource; however, it is not a sustained systemic solution. The Commission also heard from faith based and community based organisations that provide extremely valuable homelessness provision to people with limited or no recourse to

public funds. The Street Legal model, funded by the GLA with bed spaces peppered across London, provides support for rough sleepers without recourse to public funds. St Mungo's provide the bed spaces alongside Praxis to give legal advice to help people to move on. This already exists in H&F.

The Council's housing NRPF service provides limited support and accommodation for households who are homeless, destitute and have significant ongoing needs. In addition to being destitute, the adult must have eligible needs as set out in the Care Act 2014. This ensures that only the most vulnerable single adults are provided with support. Housing services manage the budgets and the provision of accommodation (procurement, rent, service charges etc.) on behalf of Adult Social Care and Children's services if accommodation for a NRPF household is required. The NRPF service currently supports 18 families and eight single person households. In the past 12 months, the NRPF team has assessed five single NRPF adults, all five were not approved.

Changes to the Home Office policy on administrative removals of EEA citizens, as outlined earlier in the report, and the reluctance of this cohort to access services for fear of being removed highlights just some of the difficulties being experienced by people with no or limited recourse to public funds.

Recommendations:

For action by the Council

- **Enable and empower the voluntary sector to organise and design day services around the experience of people who sleep rough.** H&F should take a greater role in working with the voluntary sector to help better coordinate the provision of day services for people sleeping rough to ensure that the complexity of need is sufficiently met. Crucially the design and coordination of services should be centred around the experience of rough sleepers, particularly with regards to opening times and the nature of the support provided.
- **Ensure that there are a sufficient number of outreach workers and that they are empowered to support people off the street immediately.** H&F should commission a greater number of outreach staff and ensure that they are sufficiently empowered to support people who are sleeping rough off the streets, even if they do not necessarily qualify for a NSNO offer. Future specification for the commission of outreach teams should ensure that health, drug and alcohol services are commissioned and funded to dovetail with outreach provision. These outreach teams should not only be commissioned to deliver services for people who are new to the streets, but also to undertake potentially more intensive work with people who have entrenched needs.

Mental health and substance misuse trained outreach workers should be specifically commissioned to provide emergency specialist support on the streets. Improved partnership working with the H&F Clinical Commissioning Group should lead to better health outcomes for rough sleepers. As well as ensuring that rough sleeping is considered by the Health & Wellbeing Board.

- **Provide more legal advice for people who are, or are at risk of, sleeping rough.** H&F should extend the commission of Street Legal within H&F. The service provides specialist legal advice for people with NRPF to regularise their status and get them the right help and support alongside the provision of emergency bed spaces.
- **Make sure that people who cannot access hostels have somewhere safe to stay.** H&F should assess the need for, and design a 'crash pad' service targeted at people who struggle to access hostel accommodation. This should be designed to include people who have limited or NRPF, people who struggle to prove that they have a local connection to H&F, and those who have been barred from the hostel system (e.g. due to rent arrears or antisocial behaviour). The crash pads should be designed to provide people with a safe space where they can access support services and move into hostels or permanent accommodation. H&F should also work with faith based and other community based organisations to help increase the availability of open-access provision so nobody is forced to spend nights sleeping rough.

For action by the Government

- **Government should suspend the removal of EEA migrant rough sleepers to their country of origin until there has been a full review of Home Office Guidance on EEA administrative removal regulation.** Without greater transparency on this policy, there is no way of establishing the consequences of the removal on the individual.

Section 3: Housing First and Housing Led Approaches

“If you are homeless instead of getting stuck on some course somewhere, instead of going somewhere on a course while they are homeless, forget about going on a course. Help them get a house first...And gradually build their lives back up together not just throw them in some courses. Say oh by the way when you finish your course you are still sleeping under that bridge down there because you haven’t got find somewhere to live.” Groundswell Focus Group Participant

There is overwhelming evidence internationally and regionally that resettling someone with multiple and complex needs quickly into long-term accommodation with access to support services has shown improvements in their health and wellbeing. Having sustained tenancies through housing led and Housing First approaches can end homelessness.²⁸ Only two people out of the 108 interviewed in the Groundswell research wanted to live in a hostel.

The Housing First model is designed to work best for people that are chronically homeless and have high rates of severe mental health problems, poor physical health, problematic drug and alcohol use and low-level criminal or anti-social behaviour.²⁹ There is no single definition of Housing First but the basic principles of the model, developed by Housing First England and based on the key international principles³⁰, are described in the following terms:

- Housing as a basic human right
- Immediate provision of permanent housing
- Respect, warmth and compassion for all clients
- No requirement regarding housing readiness
- A commitment to working with clients for as long as they need
- The separation of housing and services
- Use of either an assertive case management (social workers, nurses, psychiatrists, peer counsellors and employment workers, on-call 24/7, time unlimited and based in client’s home or neighbourhood) and intensive case management teams (working with chronically homeless people with fewer support needs with some direct work, connecting people into services and support)
- Choice and self-determination regarding housing and support
- A recovery orientation
- Harm reduction rather than abstinence approach with regards to substance misuse.

A Homeless Link report on the current picture of Housing First in England, indicates that 70% of projects target those with multiple and complex needs. Using this model,

²⁸ Literature Review.

²⁹ Homeless Link (2015) ‘Housing First’ or ‘Housing Led?’ The current picture of Housing First in England. Homeless Link Policy and Research Team.

³⁰ Homeless Link (2015) ‘Housing First’ or ‘Housing Led?’ The current picture of Housing First in England. Homeless Link Policy and Research Team.

multiple and complex needs are defined as people with two or more of the following support needs which impact an individual's life and ability to function in society: mental health, learning disability, substance misuse, offending behaviour, physical health needs, experience of domestic violence and abuse. Other categories included people with multiple exclusions from other services and repeat service use; those that were stuck in the housing pathway and single men who are non-priority need.³¹

There is currently no data to quantify exactly the number of people appropriate for Housing First projects, however scoping research from Homeless Link estimates it to be between 10-20% of people currently rough sleeping or using homelessness services.

Locally, according to CHAIN data, during 2016/17 in H&F, out of 102 rough sleepers, 86 people, with recourse to public funds, were recorded to have high or multiple and complex support needs.³² Out of this number, 50 were identified as having multiple support needs. The data reflects the persons' circumstances at their initial meeting by outreach on the street.

With regards to supported accommodation in H&F, support pathways vary depending on the needs of the individual. Supported accommodation in H&F is only commissioned for medium to high needs. Individuals assessed as high need will have multiple, complex support needs which are impacting significantly upon their quality of life and potentially upon the lives of others and which require a level of staffing / supervision on a 24-hour basis and significant or intensive one to one support to meet their needs. Those assessed as medium need will have multiple, ongoing support needs which are impacting somewhat significantly upon their quality of life and potentially upon the lives of others and which require staffing and supervision during the day (7 days) but not necessarily at night and regular one to one support to meet their needs.

Of the 537 individuals, 340 (63.5%) were living in supported accommodation on 31/03/17. Local data indicates that 80% of residents who were living in supported housing services during the period did not rough sleep, or did not rough sleep sufficient to be verified. Only outreach teams can officially verify a rough sleeper, therefore some of these people may be sofa surfing or intermittently rough sleeping and the outreach team has not been able to find them. For people the Council has reason to believe are rough sleeping, out of the 537 recorded as living in supported accommodation between 01/04/15 and 31/03/17, 111 people (20.6%) have a CHAIN number. Out of

³¹ Homeless Link (2015) 'Housing First' or 'Housing Led?' The current picture of Housing First in England. Homeless Link Policy and Research Team.

<http://www.homeless.org.uk/sites/default/files/site-attachments/Housing%20First%20or%20Housing%20Led.pdf>

³² Clients with 'high' recorded for at least one of their drug, alcohol, and mental health support needs. Clients with multiple needs were recorded with more than one drug, alcohol, and mental health support need, at any level (low, medium, high).

the 340 people living in supported accommodation it is estimated that 75% have multiple support needs.

The total of single homeless (rough sleepers, ex-offenders, substance misuse) bed spaces in H&F is 138. Within the single homeless supported accommodation pathway, 126 out of 138 bed spaces are for single homeless with high support needs. In total, there are 359 supported accommodation spaces in H&F as of April 2017, including 'hostel type' spaces. Between 01/04/15 and 31/03/17, 340 out of 537 people (counted once) were accessing supported accommodation spaces in H&F.

CASE STUDY: The Fulfilling Lives Islington and Camden Housing First (FLIC) Project

The Fulfilling Lives Islington and Camden Housing First (FLIC) project, running for two years, has a small cohort of 15 people housed using the PRS. All the clients were previously rough sleeping and have significant mental health and drug and alcohol needs. Findings from the report show that 90% of this cohort have sustained their tenancies after 12 months, 80% have reduced re-offending, 100% engaged with healthcare services and 60% engaged with positive activities.³³

H&F has a Housing First pilot with a cohort of five people running over 18-months, all of whom are housed in council properties. The pilot is currently running in parallel with other pathways and packages of support. The pilot started in May 2016 and aimed to house five residents during the period. Four out of five people have been housed. The Housing First residents were rough sleepers who have had multiple unsuccessful placements in supported housing and identified that supported housing could not meet their needs and residents with complex and multiple needs who were not managing well and were at risk of losing their supported accommodation.

- Two out of four have reduced their offending significantly and increased their engagement with health and actively engaged with positive activities.
- One out of four is about the same. Not worse but not better.
One client lost their accommodation as a result of anti-social behaviour but engaged with health services more than they did prior to Housing First and engaged positively with activities.

The total cost of the pilot over 18 months is £63,781 or £42,521 per year. This sum includes £5000 for personal budgets for five residents. The costs equate to a unit support cost of £163.00 for five days. The weekly unit costs are considerably cheaper than the majority of the weekly unit costs for hostel placements which range from £188 to £539.

³³ Rice, B., Reed, L. and Satchell, J. (2016) London Boroughs of Tower Hamlets & Hackney & the City of London, No First Night Out: Help for Single Homeless People, Interim Report. St Mungo's: London.
<https://www.mungos.org/wp-content/uploads/2017/07/No-First-Night-Out-Help-for-Single-Homeless-People-Interim-report.pdf>

The review of the pilot uncovered challenges that would need to be addressed if the Housing First model were to be rolled out in H&F. The complexity of need of the individuals from the target group highlighted that it would be necessary to:

- review the staff to resident ratio as more travelling time will be required and it is likely to be harder to get people linked into services such as substance misuse and health services;
- expand to a seven-day service;
- the waiting time for a suitable property has been identified as the main barrier to scaling up Housing First in H&F. If the pilot is extended the Council may need to consider alternative types of housing including PRS in order to increase the amount of available housing stock, as the FLIC project has done, although the costs of the PRS in H&F may make this more challenging to secure this accommodation within Local Housing Allowances.
- increase capacity of the PATHS team to conduct assessments due to the time taken to conduct an in-depth assessment for each individual;
- recognise that the nature of social housing is such that the neighbours are likely to have some degree of vulnerability and that they may be adversely affected. H&F will also need to consider if housing is dispersed outside of the borough, the impact this will have on other communities.

The Homeless Link report on the current picture of Housing First in England also highlighted that the biggest barrier to setting up projects is access to suitable and affordable accommodation in both the social and private rented sectors. PRS landlords are reluctant to rent to people on Housing Benefit and providers struggle to find affordable properties within the LHA rate and to raise money for the deposit to secure a property. Housing First services in London reported that it took typically between 12-24 weeks to house someone and in many cases people are placed in temporary accommodation before they are able to find a permanent tenancy.

Increasing the supply of affordable housing for people who have slept rough, or are at immediate risk of sleeping rough

Improving access to social housing is already taking place in London, Lewisham's Housing First project in Deptford (Bench Outreach) is an example of where a small percentage of housing is ring fenced specifically for this purpose.

The H&F Housing First pilot nominees were only referred to Council tenancies. The purpose of this was to increase the security of tenure for the nominee which is thought to be a key factor in making Housing First successful. However, only using Council stock reduces the potential number of properties available. Secondly, Housing First nominees require a bespoke and well thought out offer of accommodation as this is also key to making the tenancy work. Where a nominee has for example, mobility problems or they cannot live in a certain area of the borough, these factors reduce the potential pool of council properties even further. The Council must then also take into

consideration the sensitivity of the void and any neighbourhood related issues as illustrated below. Where we need to accommodate a person quickly, e.g. to get them off the streets, or because of discharge from hospital, Housing First is unlikely to be the immediate solution.

Funding for Housing First and housing led approaches

The current picture of Housing First in England report establishes that the main source of funding for Housing First is housing related support (31%). Twenty-seven per cent receive local authority grants and 15% Housing First projects were funded through fundraising and charitable sources. Little funding comes from social service (4%), criminal justice (2%) and substance misuse (2%). The report also highlights that there is inconsistent buy in from other agencies such as Adult Social Care, health, criminal justice and substance misuse agencies.³⁴

How are we going to fund the Housing First model?

The Liverpool City Region (LCR) feasibility study, undertaken by Crisis and funded by the DCLG,³⁵ shows that Housing First, implemented within a broader housing led model, is cheaper than housing people in hostel accommodation. However, transitional funding would be required to allow for the double running of hostels and housing led projects in the first two years whilst the new system is implemented. The LCR feasibility study, provides a toolkit on how Housing First and housing led projects could be implemented at scale.

Analysis undertaken as part of the LCR Feasibility Study found that Housing First is between three and five times more cost-effective than current services in delivering sustained tenancies for homeless people with high and complex needs. The study modelled various scenarios to consider the potential cash savings for local authorities in the LCR, depending on the level of service transformation. A conservative scenario, in which Housing First operates alongside reduced but still significant provision of supported housing is estimated to have cost savings of £3.29 million, and a more ambitious scenario, in which most 24/7 supported housing is replaced by Housing First, is estimated to have cost savings of £5 million.

The Commission recognises that the feasibility study is not a 'one-size-fits-all' model and that the LCR housing market is much less overheated in comparison to H&F. However, there is a significant amount of evidence that this model reduces rough sleeping and if implemented at scale could have potential long-term savings.

³⁴ Homeless Link (2015) 'Housing First' or 'Housing Led?' The current picture of Housing First in England. Homeless Link Policy and Research Team.

<http://www.homeless.org.uk/sites/default/files/site-attachments/Housing%20First%20or%20Housing%20Led.pdf>

³⁵ Blood, I., Copeman, I., Goldup, M., Pleace, N., Bretherton, J. and Dulson, S. (2017) Housing First Feasibility Study for the Liverpool City Region. Crisis: London.

https://www.crisis.org.uk/media/237544/housing_first_feasibility_study_for_the_liverpool_city_region_2017_es.pdf

The Commission is of the view that health and adult social care services should play a role in funding and commissioning Housing First alongside housing teams because it acts not only as a solution to homelessness, but also a number of health-related issues such as substance misuse and mental health problems.

Ensure public support for the growth of Housing First provision in the community

The H&F Housing First pilot has provided valuable learning around the community engagement strategy the Council should take to ensure public support for the growth of the provision. When Housing First tenants are placed in social housing accommodation, this is often amongst other vulnerable residents, and can be challenging for them and their neighbours.

For the long-term sustainability and growth of Housing First provision, the Commission recommends that the Council consider whether a 'CRZero Style Campaign' could sit alongside Housing First to engage the public in solutions and build greater understanding of the approach. The Council may also wish to consider the possibility of awareness raising approaches with social housing tenants, who are likely to live alongside Housing First tenants, whilst being mindful of the confidentiality of the Housing First client.

Housing led approach for people with lower support needs

Housing First is one model of a housing led approach which is focussed on resolving homelessness for people with multiple and complex needs. Other housing led models such as Help to Rent schemes are targeted at people with lower support needs. Built on similar principles, the approach aims to resettle people in permanent housing as quickly as possible and provide appropriate support to help someone access and sustain a tenancy. The key difference between the Housing First and housing led approach, is that the package is that the support provided is less intense. system is a model based on the principles of Housing First, in which all those experiencing or threatened with homelessness are resettled quickly in their own tenancies with support provided where needed.

The Commission recommends that anyone living in a hostel with lower support needs should be supported towards a 'housing led' solution as quickly as possible. Hostels will remain integral in providing emergency accommodation to get people off the streets as quickly as possible. However, anyone moving into a temporary accommodation should have a pathway plan put in place immediately to ensure quick move on. Housing led' support could include providing financial assistance (a tenancy deposit or helping with the cost of moving in), or more low level floating support to sustain a tenancy.

Apply a peer-mentoring approach to support people into, and to sustain, housing

In 28% of Housing First projects peer support was being used and was integral in engaging with difficult clients who had a history of non-engagement with services and authorities. ³⁶

Peer mentors can provide empathetic and non-judgmental support and can quickly relate to and build someone's trust. They act as role models, demonstrating that change is possible. Turning Point Scotland's Housing First project evaluation highlighted how the inclusion of peer support in its Housing First project was 'universally welcomed' by service users.³⁷ Peer support workers were able to break down perceived barriers and offer non-judgmental support. The evaluation highlighted the need to include peer mentors within staff teams.

"You see people who do a job...The job I do in here [Day Centre], talking with people. Even I am volunteer at the moment. You get the streets better than anybody else because you have been there, you did that. Working with homeless people you have been homeless before. It's good. It is a very good skill." Groundswell Focus Group Participant

The Groundswell research demonstrated that linking a housing led approach to peer-mentoring support would ensure that people who have already been through that process could offer support and provide opportunities for people that have already slept rough. Participants in the Groundswell research frequently highlighted the value of having support from someone who has personal experience of homelessness in helping to build trust and ultimately help them move on from homelessness.

"...employ more people from the homeless sector that have used services and they want to give back something. These people they will get a chance, they will, they will get a chance to rehabilitate that are currently in the homeless sector. And they know a lot more about it. They know exactly what you are going through and they will be able to relate to you better as well. So homeless people would be given a lot more chances to work in homeless centres after." Groundswell Focus Group Participant.

Recommendations:

For action by the Council

- **Adopt a housing led approach for people at risk of rough sleeping and people living in hostels, including a Housing First offer for people with multiple and complex needs. H&F should implement a Housing First**

³⁶ Homeless Link (2015) 'Housing First' or 'Housing Led?' The current picture of Housing First in England. Homeless Link Policy and Research Team.

<http://www.homeless.org.uk/sites/default/files/site-attachments/Housing%20First%20or%20Housing%20Led.pdf>

³⁷ Johnson, S. (2013) Turning Point Scotland's Housing First Project Evaluation: Final Report. Heriot-Watt University. <http://www.turningpointscotland.com/wp-content/uploads/2014/02/TPS-Housing-First-Final-Report.pdf>

approach for rough sleepers, people at risk of rough sleeping and people living in hostels, who have multiple and complex needs as the default option to ending their homelessness. We estimate that 68% of all rough sleepers, based on CHAIN data, have high and/ or multiple complex needs and would be eligible for a Housing First offer.

Based on the Homeless Link report, the current scope of Housing First projects house 10-20% of their rough sleeping cohort. Based on this, the Council should aspire to set up at least 15-20 placements (estimate) and set targets for the implementation of Housing First by default.

The Commission took evidence from H&F's Looked After Children's service and found an excellent model of best practice with regards to an unconditional and open-ended model of support provided to care leavers. Out of a cohort of 185 there were no Looked After Children (LAC) or care leavers experiencing homelessness. The Commission recommends that the council should adopt a similar support model for Housing First.

The Council should conduct a feasibility study similar to that in the Liverpool City Region to assess the longer-term savings against the roll out cost and the implementation of Housing First for people with complex needs and a housing led approach for people with lower support needs.

There is likely to be a two-year period of 'double running' of services. Thereafter the Council can look to decommission a proportion of hostel services and invest this funding into Housing First in year three and four. The Commission recommends that hostel provision should only be commissioned as emergency provision with a focus on move-on.

- **Ensure that homes are made available in the private and social rented sector for people who are made a Housing First offer.** H&F should explore the use of the PRS using the H&F SLA to secure accommodation for Housing First clients. It has been demonstrated that the PRS can help to successfully deliver Housing First, relieving pressure on social rented stock and housing people more quickly.
- **Ensure that health structures within the local authority are involved in commissioning Housing First.** Housing First is not only a solution to rough sleeping and homelessness, but also addresses a range of other support needs including mental health and substance misuse. The Commission therefore recommends that services are not purely commissioned and funded by H&F housing and homelessness teams, but in collaboration with Health and Wellbeing Boards and Clinical Commissioning Groups.

- **Implement a housing led approach to move people with lower support needs out of hostels and into settled housing as quickly as possible.** H&F should ensure that move on plans from hostels aim to make it easier and faster for someone to ultimately move into independent living. These are currently completed on individual needs basis and constantly reviewed. There is no minimum or maximum time limit. With housing led approaches, whilst someone might not need an intense package of support they might require some tenancy support. This could be done through the SLA.
- **Engage homeless people and people with experience of homelessness in commissioning and delivering services.** The Commission recognises the value added by peer-mentoring to homelessness services. It is therefore recommended that H&F include a requirement to provide a peer mentoring service in homelessness services, including Housing First. Involving (including employing) more people with experience of homelessness will provide a vital opportunity for people that have used services to give something back and support the rough sleeper to navigate the avenues of support available.

For action by the Government

- **The Government should provide additional funding at a realistic level for Housing First implementation.** This will allow for a smooth transition from a hostel based system to a housing led approach so there is no drop off in services. Over the period of scaling up Housing First provision there will be double running costs until the council begins to decommission some bed spaces in hostels.
- **The NHS and Public Health England should allocate budgets on a pan-London basis for homelessness interventions, including Housing First and housing led services.** The NHS is a major point of contact for rough sleepers. Housing First is not just about tenancy sustainment but also focuses on tackling drug, alcohol and mental health issues.

Section 4: Ensuring access and adequate supply of secure and affordable housing for rough sleepers or people at immediate risk of rough sleeping

Review allocations policies to ensure rough sleepers are not unfairly excluded (e.g. because of time spent in prison or previous financial difficulty), and eviction policies to ensure accommodation is not lost

A recent Crisis report demonstrated the issues experienced by people with a history of rent arrears, anti-social behaviour and recent criminal convictions in accessing social housing as result of changes to social housing allocations policies.³⁸

Evidence taken by the Commission also found that it was becoming increasingly difficult for people to access housing association tenancies. The Commission believes that this trend must be reversed if H&F is going to reduce the number of people sleeping rough. Even if the Council revised their own allocations procedure however, housing associations have their own. Therefore, this is as much about the commercial model of housing associations as well as local authority policy.

A SLA focusing on supporting people who are homeless or at risk of homelessness to create and sustain tenancies.

Between 2001 and 2011 the size of the PRS in H&F increased from 23% to 33%. It is likely that this has continued to rise. H&F's new SLA scheme aims to modernise property acquisition and improve procurement of PRS properties with a new commercial property management service. Options will include: leasing with full management, assured shorthold tenancies (ASTs) with full management and ASTs with a matching service only.

Properties will be mainly procured within the borough but as housing pressures continue sometimes homes are acquired in neighbouring local authorities. H&F have identified target areas that will be within and no further beyond Ealing, Brent and Harrow.

Pre-tenancy training for tenants and package of support for tenants and landlords

It was clear from the verbal evidence that tenants would benefit from pre-tenancy training which will be an important offer made through SLA. In addition to the pre-tenancy training and financial support to move people into private rented accommodation, the Commission recommends that a package of ongoing support for tenants and landlords is put in place to ensure that tenancies are sustained. This may

³⁸ Rowe, S. and Wagstaff, T. (2017) Moving on: Improving access to housing for single homeless people in England. *Crisis: London*

also apply to landlords across London, for example, if accommodation is out of the borough.

“So it means to say if you were a landlord and you have someone who doesn’t present well, who has limited affordability, you need to look after your business, it is a no-brainer. I am not going to give it to you, I will give it to someone who can afford it because they are working. So, for that reason that need extra support...Private rented sector brokers and tenancy support and at the same time having access to a sound affordability calculation so that they know exactly where the money is going to come from.” H&F Link Manager, Verbal Evidence Session

The Private Rented Access Development Programme began in 2010 and was devised by Crisis, working with and funded by the Department for Communities and Local Government. The programme aimed to increase the number and geographic spread of access work and to encourage the creation of sustainable tenancies. An evaluation of the programme conducted by the University of York, indicated that 90% of the tenancies under the programme had reached their sustainment target of six months or longer, demonstrating the clear benefits of a package of pre-tenancy and in-tenancy support.³⁹

“I suppose if you want to go into independent living you are still having to manage all those things. Who is going to give you the support for benefits? Who is going to be responsible for making sure you pay rent? There is all sorts of responsibility. See my bills and things like that, I like just doing it directly so I don’t have to worry about it.” Groundswell Focus Group Participant

We recommend that the Council offer pre-tenancy training for all tenants and package of support for tenants and landlords (like previous DCLG PRS Access Development Scheme) through the SLA, including Housing First tenants.

Amending eviction policies to ensure that accommodation is not lost

In addition to putting in place a package of support tailored to meet individual needs, housing providers should ensure that housing management and information management systems are capable of identifying and responding swiftly to early indicators of tenancy sustainment problems that might trigger enforcement action, including if caused by under or non-payment of rent. Housing providers are required by the Tenancy Standard (2.2.7) to support tenants to maintain their tenancies and prevent unnecessary evictions.⁴⁰ There is a high cost associated with tenancy failure, including for the landlord, the tenant and the wider community – and it is in the interests of all parties that housing associations intervene proactively to prevent evictions where possible. Research has shown that while the provision of support can make a

³⁹ Rugg, J. (2014) *Crisis Private Rented Sector Access Development Programme: Year Two to April 2013*. York: University of York.

⁴⁰ Homes & Communities Agency (2012) Tenancy Standard. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419209/Tenancy_Standard_2015.pdf

difference in terms of tenancy sustainability, it is not (in isolation) the solution to tenancy failure prevention and it is not a key driver of rental payment rates.⁴¹

The characteristics of an effective preventative response include:

- Holding up to date and robust information about tenants;
- Maintaining regular contact with tenants in a way that helps build trust and communication. This should include regular and routine contact with tenants through the full range of available opportunities, both tenancy and property maintenance related, and using communication mechanisms tailored to the requirements of the tenant.
- Delivering routine, person centred engagement through housing management, maintenance and/or support services (whether financial inclusion support, employment support or tenancy related support) may require a review in management practice to embed homelessness prevention as an objective alongside other business objectives.
- Adopting proactive approaches to rent collection that identify where wider financial pressures may trigger arrears or other forms of debt.
- Considering the need for a service navigator/key worker to help the tenant navigate services and ensure the activities of the landlord and other agencies are co-ordinated (where this role is not provided by a housing related support service).
- Identifying and responding to adverse events that can trigger tenancy sustainment problems, whether economic (loss of or reduction in earnings or benefits), personal (relationship breakdown or bereavement), routine domestic (e.g. washing machine breakdown) etc.
- Where it has not been possible to prevent the commencement of enforcement proceedings, housing providers should notify the local authority Housing Options service using agreed protocols.

As part of its preparations for implementation of the Homelessness Reduction Act, the Council should work with housing providers in the borough to put in place effective early notification and response arrangements where housing association tenants are at risk of tenancy failure, and to ensure that a joint landlord/Housing Options approach is adopted to working with the tenant to prevent homelessness. This might include referral to routine multi-agency panel meetings to review cases and develop person-centred plans to prevent homelessness in individual cases.

Housing Affordability

Using care leavers as an example (from the verbal evidence) who have less entrenched needs and who are more likely to be in work or study, although they qualify

⁴¹ Ambrose, A., Eadson, W., Hickman, P. and McCarty, L. (2015) *Tenancy Sustainment amongst those aged under 35: final report*. Sheffield: Sheffield Hallam University

for “affordable” 80% market rate housing association properties from care, it is unlikely that they will be able to take them up.

The Council is currently experiencing problems as a result of housing association properties not being affordable to those under the age of 35. Housing association rents are set at “affordable” levels which causes issues for those in this group. Therefore, it falls to the Council to provide housing that is within the means of this cohort. There is uncertainty around the availability of affordable properties to meet the growing demand in the future, which is a concern.

The Commission recommends that when nominating someone who has slept rough, it must be to a property that is genuinely affordable and is sustainable

H&F has also secured £600k in Trailblazer funding and is working with voluntary sector partners to provide preventative services for those in the PRS.⁴²

Robust support for vulnerable groups moving on to Universal Credit

H&F was one of the first local authorities to pilot Universal Credit roll out in October 2013 and full roll out was completed in June 2016. For the Council and tenants the impact of this roll out has been financial, namely the widening discrepancy between Universal Credit payments and rent to landlords. This is shortfall is caused by the benefit cap and freezing of LHA rates, which has impacted on the procurement of private rented property. There is a squeezed middle who remain vulnerable but are not entitled to be exempt from the benefit cap. H&F is outpriced in the market and has to incentivise private landlords to procure suitable properties, with local authorities outpricing each other for properties in the market. Cheaper property is sourced outside of H&F and potentially further away from someone’s support networks.

A key theme to arise from the Frontline Workers Session and the verbal evidence given by the H&F Link Service was the need for a robust and coordinated support package for vulnerable people moving onto Universal Credit. Many frontline workers felt that a more joined up approach between the Council and the Job Centre would help ensure that the appropriate support is in place particularly when people are waiting for their first Universal Credit payment. A need for more coordinated work between the DWP, the Council and hospitals and GPs to support rough sleepers in substantiating their benefit claim was also identified.

⁴² DCLG Homelessness Prevention Trailblazers.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/581202/HPP_Trailblazer_Prospectus_-_archived.pdf

Protection from sanctioning for people rough sleeping or at immediate risk of homelessness

Another theme to arise from the Frontline Workers Session is that there could be more coordination between the DWP, the Job Centre and the Council to prevent people from being sanctioned. Evidence has highlighted that often the Council became involved after someone was sanctioned, which was too late to mitigate against the impact. The final decision to sanction someone rests with the DWP and the Commission found that there is currently no clear line of communication or formal mechanism between the council and DWP to prevent the decision to sanction someone from being made if someone is at risk of homelessness.

There is scope to provide more preventative work to avoid someone from being sanctioned in the first place. The Commission is of the view that addressing someone's homelessness is the priority before finding employment. If the Job Centre can work with the Council to engage a person in finding accommodation, this should be considered a tangible step in finding employment and could be offered as a way of mitigating the impact of sanctioning.

Exempt people who have been in hostel accommodation from the Shared Accommodation Rate (SAR)

Evidence from the Frontline Worker session and from the H&F Welfare Reform Manager strongly recommended that people who have lived in hostel accommodation should be exempt from the SAR. There appeared to be uncertainty around what the exemption rules are. People who were making applications for benefits may be exempted. However, the DWP do not have a list of hostels for them to acknowledge residence there. Also, the better quality hostels that have self-contained facilities often fail to meet the description of hostel accommodation as defined for the purposes of the exemption from the SAR. As discussed, the SAR can stop people from moving on into more sustainable accommodation.

Availability of DHPs for people in PRS

The analysis of the national picture shows that social housing tenants were claiming more DHP than private tenants. In England, three fifths of total DHP spend in 2013/14 was primarily to mitigate the problems that were being generated by the removal of the spare room subsidy.⁴³ Housing Association and council staff are much more aware of the use of DHPs than private landlord, and will offer their tenants advice on how to apply for them. There is clearly a need to ensure that private tenants are

⁴³ Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2017) The Homelessness Monitor: England 2017. Crisis: London. https://www.crisis.org.uk/media/236823/homelessness_monitor_england_2017.pdf

better able to access financial assistance when they fall into, or are at risk, of rent arrears.

One way of making the system more accessible would be for the Council to set up a single point of access for financial assistance for housing related issues, rather than tenants having to apply for local welfare allowance assistance and various other types of funding, including DHPs, separately as this can be difficult to navigate

Invest in the supply of affordable shared accommodation for under 35s

Currently, there is joint work going on between Housing and Children Services in H&F and neighbouring boroughs to identify solutions to mitigate against homelessness for young people, including care leavers. This will require further discussion and negotiation between the Council and housing associations as it is possible and must be a priority.

The Commission is of the view that the Council needs to consider increasing supply of affordable shared accommodation for under 35s whether this is converting existing properties or new build supply for shared accommodation. The benefit cap and changes in benefit rules means that under 35s have little or no access to self-contained accommodation and there is a lack of accessible and affordable accommodation.

Recommendations:

For action by the Council

- **Ensure that rough sleepers are not unfairly blocked from accessing social housing.** H&F needs to negotiate with / apply pressure on housing associations (Registered Providers) to review and change their allocations policies to make sure that rough sleepers are not unfairly excluded, for example, because of time spent in prison or previous financial difficulty.
- **Make sure social housing is provided for people who are made a Housing First offer.** H&F should ring fence a portion of social housing for people who have slept rough, including those made a Housing First offer so it is readily available once a client has been identified and assessed. Based on the estimated number of Housing First placements, approximately ten could be ring-fenced for Housing First by the Council from its stock. The rest could be sourced from housing associations and private rented stock via the SLA.
- **Provide shared accommodation solutions for young adults.** H&F should seek to increase the supply of affordable shared accommodation for under 35s.

This could be achieved by converting existing properties or building new shared accommodation. The extension of the SAR has had a negative impact on the affordability of accommodation for people under the age of 35 and in turn accessibility of the PRS. If a rough sleeper is under 35 and is not exempt from the rule, they are not entitled to claim the benefit rate for one-bedroom self-contained accommodation.

- **Make sure that regeneration and development provides more housing solutions for homeless people.** H&F should, where possible, ringfence a portion of housing development as part of regeneration and planning initiatives (e.g. the new Hammersmith Town Hall development) specifically for the provision of stock for Housing First and housing led tenancies. The Council should explore how Section 106 could be used most effectively to deliver homes at social rents specifically for the provision of housing units for rough sleepers and people who have experience of, or are at risk of, homelessness.

For action by the Government

- **The Government should undertake a review of Local Housing Allowance (LHA) rates to reduce the gap between Housing Benefit and affordable (market) rents to improve access to homes.**
- **The Government should reassess the Housing and Planning Act 2016's impact on social housing.** Evidence taken indicates that currently national policy is undermining the supply of social housing.
- **The Government should increase the grant for social house building.** The Housing and Planning Act 2016 widens the definition of 'affordable housing' to include Starter Homes, which is likely to be prioritised above genuinely affordable homes such as social housing and other forms of low cost housing. As a result, the policy will lead to a further decline of genuinely affordable housing for people who have experienced, or are at risk of, homelessness.