

HOMELESS LINK'S EVIDENCE: WORK AND PENSIONS COMMITTEE INQUIRY ON IMPACT OF THE CHANGES TO HOUSING BENEFIT ANNOUNCED IN JUNE 2010 EMERGENCY BUDGET

EXECUTIVE SUMMARY

This submission is from Homeless Link, the national umbrella organisation for frontline homelessness charities in England.

We recognise the necessity of housing benefit reform, including initiatives to promote savings, and eliminate inefficiency, error and fraud from the system. We support moves to improve how housing benefit, other benefits and tax support the journey into work and prevent homelessness, as called for in our 2010 manifesto.ⁱ However, many of the changes outlined by the Emergency Budget pose serious risks to:

- the wellbeing of people who are homeless, or at risk of homelessness
- the sustainability of homelessness organisations, which in turn will undermine the support offered to homeless people and other vulnerable groups

It is also highly doubtful that the changes will lead to governmental savings in the medium- or long-term. The evidence available suggests that the changes will lead to greater levels of debt and homelessness, with impacts on emergency accommodation, health services, benefit uptake and economic activity creating greater strain on government spending. While other coalition initiatives to improve availability of, and access into work might alleviate this effectⁱⁱ, the evidence for this argument is shaky, particularly as the expected cuts in civil and public service jobs is likely to increase pressure on the job market.ⁱⁱⁱ

Amongst other recommendations, we propose that:

- there should be provisions for most vulnerable people, including homeless people, to be exempt from some of the proposed housing benefit changes.
- supported accommodation providers should also be made exempt from the proposed 10% cuts in housing benefit after one year on JSA and to be protected from the impact of loss of income due to benefit changes or reductions. Given the vital role providers of supported accommodation play in alleviating homelessness and saving spending overall^{iv}, this makes economic sense, as well as providing a vital safety-net for thousands of people in the UK.
- there needs to be a commitment and comprehensive strategy from the coalition to look at long-term solutions to housing issues beyond housing benefit reform.

Homeless Link is the national umbrella organisation for frontline homelessness charities in England. Currently we have more than 470 member organisations. Our members include hostels, day centres, outreach and resettlement agencies, housing advice centres, youth projects, health projects, welfare rights groups, regional homelessness networks, refuges, drug and alcohol services and faith run voluntary services. As the collaborative hub for information and debate on homelessness, we seek to improve services for homeless people and to advocate for policy change. Through this work, we aim to end homelessness in England.

EVIDENCE

We outline our evidence below on the key changes to housing benefit. Our response will focus on three of the eight issues identified for this inquiry, though has relevance for other areas:

- incentives to work and access to low paid work
- levels of evictions and the impact on homelessness services
- community cohesion

We will outline the impact of some of changes announced, but will not cover all the specific impacts. We will also outline issues surrounding additional costs to government services arising as an unintended consequence of these changes, and offer recommendations for the Select Committee's consideration. Examples from our member agencies are included in text boxes.

1. Incentives to work and access to low paid work

The key relevant change to housing benefit in terms of work incentives is the proposal (requiring primary legislation) to reduce the housing benefit award to 90% after 12 months for claimants of Jobseekers' Allowance (JSA). The implications of this change for homeless people and people at risk of homelessness are outlined below.

1.1. Lack of incentives to work

People who are homeless want to work; 77% of homeless people say they are ready to work now and 97% want to work in the future.^v However, they need an appropriately staged approach, including skills development and employment support, designed in the knowledge of what works with this group of people. For homeless people there are often many interlinked barriers which have to be overcome if they are to secure and sustain a home and a job.^{vi} Given these conditions, cutting housing benefit after a year on JSA is likely to penalise many individuals without work or a home of their own, rather than encourage faster move into work.

“By looking at very rough calculations we can see that the under 25 group in such circumstances would commonly be left with less than £4.20 per day to meet all other costs of living and expenses to find gainful employment...the likelihood is that such a measure would in the longer term prove considerably more expensive to society as a whole due to the associated costs of extended periods of rough sleeping.” (Huggard)

People who have poor health or disabilities who have been moved onto Jobseekers' Allowance often take longer to find work.^{vii} As Crisis states: “homelessness damages people's capability through loss of skills, through an inability to think about employment whilst worrying about housing, and through their health becoming impaired whilst homeless.”^{viii} This proposal will leave people facing real hardship, or needing ongoing support, and could penalise people at the point when they are trying to find work.

“The proposed reduction of HB after a year would have a significant adverse effect on this group of clients at exactly the time when they would (in our experience from delivering floating support services to this group) need to have maximum security in their lives in order to continue moving forward with their journey back to employment.” (BCHA)

1.2 Employment opportunities

Homeless Link's additional concern is that the job market will be substantially worse by the time this cut comes into effect. The coalition's deficit reduction measures may contribute to an increase in unemployment to nearly three million in late 2012, remaining near to that level until 2015^{ix}, not least because of the expected cuts to public sector staff. In this sense, there is a high likelihood that genuine workseekers (including those who are homeless or at risk of homelessness) may be penalised in a "difficult economic climate".^x

1.3 Improving support for disabled claimants

Whilst much of our analysis is critical, we welcome the changes to housing benefit which will entitle claimants with a disability and a non-resident carer to funding for an extra bedroom. We feel that this will help support potentially vulnerable people more effectively, as well as in some cases be part of a transition into work, alternative accommodation and off housing benefit altogether.

2. Levels of evictions and the impact on homelessness services

2.1 Cuts in income and evictions

Housing Benefit is designed to help people on low incomes pay for rented accommodation whether in or out of work. However, it is clear that it does not perform this function well at points. While there have been a number of recent reports highlighting that some unemployed housing benefit claimants are able to live in properties beyond the reach of most people with employment^{xi}, the reality is that for most claimants, housing benefit is insufficient to their needs. As outlined by Crisis' excellent briefing on housing benefit changes, 48% of people on Local Housing Allowance (LHA) experience a shortfall between their rent and benefit, with the average shortfall being £23/week.^{xii} As such, claimants are very exposed to even small changes to housing benefit. Crisis' Housing Benefit Survey 2010 outlines that even a £15 reduction in LHA would have a significant effect; 90% of housing advisors "said a £15 reduction in LHA would make more difficult for claimants to cover their rent, with 54% saying it would make it nearly impossible".^{xiii} This is particularly pertinent to the planned removal of the £15 excess, which would lower incomes by this amount. Other relevant points include:

- Almost half of local housing allowance claimants already have shortfalls of almost £100 a month.^{xiv}
- If the additional £40 million for discretionary housing payment proposed was spent solely on making up shortfall in rents, this would only support 4% of claimants facing the drop in LHA from the 50th to the 30th percentile for one year.^{xv}

Taking another example, the 10% cut to HB following claimants receiving JSA for one year is likely to have a serious affect on individuals' income. The National Housing Federation (NatFed) warns that these plans will lead to real terms cuts of up to 50% in disposable income for a significant proportion of the nation's 4.7 million Housing Benefit claimants.^{xvi} While many recipients of housing benefit will face less stringent drops in income, the DWP's own impact assessment of some of the changes demonstrates the tangible effects:^{xvii}

Case study: An unemployed single and childless person in London with a weekly rent of £350 would see their housing benefit cut by £35. This would mean if they topped up housing benefit with JSA they would be left with £30.45 for food, clothing and energy. (Derived from DWP Impact Assessment of the changes to Local Housing Allowance from 2011)

Case study: Sarah has been on JSA since February 2010. She is single and without children. Her only health issue is alcohol dependence which is not sufficient to get her on to incapacity benefit. JSA is her only option. She is unlikely to go back to work for at least a year because of lapses into drinking bouts. A local agency is helping her arrange volunteering to improve her employability. Sarah has rent arrears of over £600 (July 2010) and her Council have successfully applied to have £20 deducted from her JSA entitlement to reduce these arrears. Unless her alcohol dependence improves and she finds work she will be affected by the housing benefit changes and will have a further 10% shortfall between rent and HB entitlement to meet out of her (restricted) JSA entitlement. Sarah's fortunes may change by April 2013 but she is a good example of clients who, due to minor health issues which are not recognised as sufficient for entitlement to incapacity benefits, are instead dependent on JSA and will face 10% falls in their HB entitlement, with few resources to meet the shortfall. This makes significant arrears and thus eviction for Sarah ever more likely. (case study anonymised, provided by Thames Reach)

As a result, the housing benefit changes due to come into effect are likely to lead to:

- a significant increase in evictions and homelessness
- increased financial pressure on accommodation services, likely to mean that many will fold
- increased service uptake of other homelessness services

These cuts are also likely to impact on particularly vulnerable groups, such as LGBT individuals at risk of homelessness:

“Such changes may deter some LGBT people from fleeing domestic abuse or harassment or they may accept less affordable, more crowded and more insecure accommodation as an alternative. This is a poor short-term solution that may fail and cost the public sector more in the long-term if tenancies fail sooner and more LGBT people become homeless or they need to access more social, primary care and mental health services.” (Stonewall Housing)

These cuts will worsen the ability of people on low incomes to pay for both public and private rented accommodation. Because of a lack of availability and eligibility in the case of social housing, there has been increasing use of the private rented sector (PRS). However, people on housing benefit trying to find accommodation in the PRS face a lack of affordability^{xviii} and a lack of willingness of landlords to accept individuals in receipt of housing benefit.^{xix} Indeed, the reduction of LHA rates to the 30th percentile of local rents and application of LHA caps is likely to price many claimants out of the PRS.

A likely result will be that many homeless people remain stuck in more costly supported accommodation for longer than they need to be and prevent access to this support for those most in need. In addition, this is “likely to lead to increasing rent arrears and tensions between landlords and tenants, probably with the long term effect of further reducing the supply of properties that landlords are willing to rent to housing benefit claimants.”^{xxx}

In particular, the index linking of LHA to the Consumer Price Index (CPI), rather than on the basis of local rents, is likely to produce the most significant impact of all the changes outlined by the Emergency Budget. As rents generally rise faster than the CPI index, over time the value of LHA rates will be eroded. Over the previous 10 years, “rent inflation has risen 2.57 percentage points above the CPI level.”^{xxxi} This will break the link between housing benefit and rent, and benefit levels will cease to reflect local rent levels. Poorer people are the most exposed to the impact of these cuts and this change specifically.^{xxii}

2.2 Impact on accommodation providers

Homeless Link are clear that any cuts in Housing Benefit will have an immediate impact on accommodation and related support providers. Many registered providers, including many homeless services, receive over 60% of their income from housing benefit. With these changes, the removal of Supporting People funding ring-fencing (as well as potential further cuts)^{xxiii} and VAT increases from January 2011, many providers, including homelessness services offering accommodation may face insolvency and collapse. Certainly, the plans to introduce a 10% cut in housing benefit for people who have been on JSA for over a year could result in the impossible choice between charities taking a 10% drop in their rents or evicting their tenants onto the street.

Aside from accommodation services, the increase in homeless people may also mean greater pressure on advice and support services. This may entail an increase in ‘fire-fighting’ by these services with a larger group of homeless individuals, with less accommodation options available.

3. Community cohesion

3.1 Creating deprived communities

Homeless Link anticipates that the housing benefit changes are likely to alter communities, both by movement between, and within, local authority areas. Many people will be forced to move to lower rent areas, with “an impact on the areas that they move to, potentially putting a strain on those local authorities (including on homelessness budgets).”^{xxiv}

These changes are also likely to dramatically alter the character and make-up of communities within local authorities areas. For example, Camden Council predicts that the south of the borough will no longer be a viable place for housing benefit claimants to live, forcing many out of neighbourhoods and long-standing communities.^{xxv} While the LHA caps are likely to have the greatest impact in London, these changes have the potential to concentrate deprivation on in particular areas, most likely the outskirts of cities, with more likelihood of creating no-go, ghettoized areas of poor quality housing.

“We operate services in areas where many of the rental charges fall into the percentile area where caps would operate. Our concern is that this will force our clients to opt for less appropriate housing options and increase issues such as overcrowding / a return to 'slum dwellings” (BCHA)

4. Additional costs to government and public services

Vitality, Homeless Link is doubtful that changes to housing benefit will save money for public services and the government in the long run. **The changes are likely to cost considerably more than they save.** This undermines one of the core aims of the Emergency Budget, and the further austerity measures to be unveiled in October's Comprehensive Spending Review.

Let us take the example of the cuts to housing benefit following claimants receiving JSA for over a year. The June 2010 Budget forecast that this measure will save **£100 million** in 2013/14, rising to **£110m** by 2014/15, relative to maintaining the current system.^{xxvi}

We present a very basic analysis with two separate sets of statistics:

- the National Housing Federation estimates that **202,000** people are at risk of being made homeless purely as a result of the benefit cut of 10%.^{xxvii}
- research by the New Economics Foundation (nef) indicated an annual cost to the state of £26,000 for each single homeless person.^{xxviii} However, the estimate from nef included the cost of benefits at 31% of the £26,000 figure.^{xxix} Many of the people who might be made homeless will be on benefits already. In addressing the additional costs to health, social care, and loss of economic input, we chose to exclude that element to ensure we are not 'double-counting' benefits (despite the fact that many people will not be drawing benefits before becoming homeless). Using the New Economics Foundation figures, that would be **£16,640** per person.

If we accept these figures, this would suggest that 202,000 more (single) homeless people would entail a **£3.4 billion** cost to the state annually. This would be a **net £3.3bn cost** to the state rather than a saving, as a result of this specific change in 2013/14. Moreover, the total saving of all housing benefit reforms is outlined as **£1.76bn** in 2014/15, and a total of **£4.2bn** over 2010-11 to 2014-15.^{xxx} Even if only half the 202,000 people 'at risk of homelessness' actually became homeless in 2013/14 through the 10% cut, this would still cost the state an estimated **£1.7bn** annually, without even taking into the account the likely negative effects of all other changes on homelessness levels.

We must stress that this analysis makes a number of assumptions, and must not be considered as a comprehensive economic appraisal of the costs. However, allowing for these assumptions, this presents a very serious potential economic and social impact of just one of the changes to housing benefit. Again, these changes are likely to cost far more than they save. The caps to housing benefit, the index linking of this benefit to the CPI, and other changes would also be likely to increase pressure on health services, debt services, and reduce the ability of many individuals to find work. They are likely to compound the losses to such a degree that public spending increases, rather than decreases, as a result of the changes. We do not ignore or reject the need to improve housing benefit, to increase work incentives, or ensure that benefits are commensurate with need, but the changes as proposed are likely to do serious lasting damage to public welfare and economic growth.

Case study: Nicki is a 30 year old Trans woman diagnosed with gender dysphoria, schizophrenia and anti-social personality disorder. Previously when homeless, she attempted suicide over 30 times, self-harmed and was hospitalised on numerous occasions. Her mental health has stabilised since being rehoused in the private sector. Since the announcement of the proposed changes to Housing Benefit, Nicki has called Stonewall Housing every day with worries about homelessness. She is anxious that she will not be able to afford her current accommodation and will become homeless. She is worried that if her Housing Benefit is reduced she will not be able to afford private rented accommodation. If Nicki were to become homeless due to rent arrears, she would approach the local authority for emergency accommodation. She is likely to be in priority need but they may argue that she has made herself intentionally homeless due to rent arrears. Due to the uncertainty, and high risk of future homelessness, there is already a decline in Nicki's mental health. (Stonewall Housing, anonymised case study)

5. Recommendations

We feel that the majority of the housing benefit changes require a fundamental rethink, as it is clear that these changes will affect a huge range of vulnerable groups, not just those who are at risk of homelessness. Homeless Link calls for:

- 5.1 **Setting LHA rates at a percentile in each area that reflects the proportion of tenants receiving the benefit.** As outlined by BSHR, this is likely to ensure significant savings in public expenditure while avoiding “the most intolerable pressures on local housing markets.” (BSHR, p.10)
- 5.2 **Consideration of exemptions for most vulnerable people,** including homeless people and particularly those with multiple needs, from the proposed Housing Benefit changes.

“Exempting people in supported housing is essential” – Byker Bridge Housing Association

We understand that the DWP is already considering a list of exemptions to some of these changes. We appreciate that exemptions add to the complexity of the administration of housing benefit, but in light of our evidence above, and barring a fundamental alteration to the changes proposed, we feel that exemptions would be vital to avoid serious additional harm to these vulnerable groups. However, looking longer term, we would suggest there is scope for examining how any savings from DWP expenditure might be used to improve benefit withdrawal and entitlement to ‘in-work’ benefits, as discussed by the ‘21st Century Welfare’ consultation.^{xxxi}

- 5.3 **Consideration of exemptions for supported accommodation providers** from the proposed 10% cuts in housing benefit after one year on JSA. Given the vital role providers of supported accommodation play in alleviating homelessness and saving spending overall^{xxxii}, this makes economic sense, as well as providing a vital source of support for thousands of people in the UK. We recognise the argument that this may offer impediments to moves from supported to private sector housing. However, as

above, the potential impact of the housing benefit changes are likely to be so significant that without a wide rethink of the proposals, the negative impacts on people who are homeless will need to be alleviated. We feel that this recommendation offers a reasonable, though temporary option for doing so.

- 5.4 Ongoing monitoring of the discretionary housing payment** to ensure any serious rent shortfalls across populations are identified and acted upon swiftly by local government.^{xxxiii}
- 5.5. Ensuring that all claimants are informed of impending changes by letter or email.** It is vital to give due notice to people who may be affected so they can begin the process of adjustment or housing move now.^{xxxiv}
- 5.6 A commitment and comprehensive strategy from the coalition government to look at long-term solutions to housing issues**, including expansion of social housing and the increased renovation and use of empty homes. For example, the British Property Federation has outlined that renovating some of the 762,000 empty properties in England could address the pressures on social housing while costing only 10 per cent of the equivalent cost of building new houses.^{xxxv}

While it is difficult to assess the economic impact of these recommendations, undermining the negative impacts of the changes to housing benefit on levels of homelessness, health needs, and reduced economic activity are likely to have positive effects on the government's spending. We would welcome the opportunity to work with the Committee and government to cost out the impact of these proposals in more depth.

We would also welcome the opportunity to offer oral evidence to the Committee.

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ⁱⁱ BBC News (2010) 'Nick Clegg slams 'partial' IFS report on Budget', 25th August. Available at: <http://www.bbc.co.uk/news/business-11086137>

ⁱⁱⁱ BBC News (2010) 'Huge job cuts for public sector', 16th June. Available at: <http://news.bbc.co.uk/1/hi/business/8102121.stm>

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