

Tackling homelessness together

Submission from Homeless Link, May 2019

Introduction

1. Homeless Link is the national membership charity for frontline homelessness agencies and the wider housing with health, care and support sector in England. With over 750 members, we work to improve services and campaign for policy change that will help end homelessness.
2. Homeless Link is a member of the Making Every Adult Matter Coalition (MEAM), alongside Clinks and Mind, formed to improve policy and services for people facing multiple needs. Together the charities represent over 1,300 frontline organisations that have an interest in the criminal justice, substance misuse, homelessness and mental health sectors. We support local partnerships across the country to develop effective, coordinated approaches to multiple needs that can increase wellbeing, reduce costs to public services and improve people's lives.
3. We welcome the opportunity to submit a response to the 'Tackling Homelessness Together' consultation. Our response has been informed by discussions with member services working across England, and with wider sector partners.
4. Homeless Link would be glad to elaborate further on any of the information provided. For any questions about this submission, please contact Chris Brill, Policy Manager at Chris.Brill@Homelesslink.org.uk

Context

5. People who are homeless may need a range of support to help them end their homelessness – accessing and sustaining housing, improving poor health, overcoming substance use, gaining skills and employment and moving on from offending. This is why each year a range of homelessness services play a critical role in helping thousands of people leave homelessness behind and preventing many more losing their homes in the first place.
6. Local authorities play a significant role in helping to tackle homelessness through the services they commission and the direct support they provide. However, central government funding for local authorities has fallen by half since 2010/11, driving local authorities to make decisions about where to allocate smaller amounts of funding.¹ **New research commissioned by Homeless Link and St Mungo's shows that overall, more than £5bn less has been spent on homelessness-related activities between 2008/9 and 2017/18 than would have been spent had funding continued at 2008/9 levels.**²
7. At the same time rough sleeping has risen by 165% since 2010 and the number of bed spaces in homelessness accommodation projects has fallen by 30%. The reduction in funding has also crucially resulted in a reduction in preventative support, changes to commissioning and greater competition between providers to tender for smaller pots of money. **Funding cuts have had a cumulative impact on local services being able to work in partnership and on the ability of local authorities and the homelessness sector to effectively tackle homelessness.**

¹ NAO (2018) Financial sustainability of local authorities 2018. <https://www.nao.org.uk/wp-content/uploads/2018/03/Financial-sustainability-of-localauthorities-2018.pdf>

² WPI Economics (2019) Local authority spending on homelessness. Understanding recent trends and their impact

8. A well-coordinated local response from services both prevents people from reaching the point where they face multiple problems and responds effectively to individuals needs when they do. Services across the housing, criminal justice, health and social care systems must all be supported to coordinate their efforts and provide the comprehensive and holistic support that people experiencing homelessness need. **Any new accountability arrangements must, therefore, facilitate strong local partnership working, embedding outcomes around tackling homelessness across all local strategies. Arrangements should support commissioners, services and people with lived experience to design the best local solutions and ways of measuring success.**
9. **It will also be important to have avenues for any accountability structures to hold central government to account for the wider structural causes of homelessness that are outside of the control of local areas. This will be particularly important around changes to local authority funding, access to genuinely affordable housing and on-going changes to the welfare system.**

Existing accountability structures

Question 1: What non-statutory structures are you aware of in your areas that cover homelessness as part of their agenda?

10. Homeless Link members have worked within many non-statutory and partnership structures across England. These have been developed in some instances by voluntary and charity organisations in response to a perceived weakness with the current statutory structures.
11. *Rough sleeper or homelessness forums* have been a particularly useful method for the sharing of information, discussion of local issues, for local partnership working and developing and implementing local solutions, with particular positive examples in Yorkshire and Humber and Cumbria (which include representatives from MHCLG and/or DWP) Doncaster, Hull, York and Barnsley. These areas have strong homelessness or rough sleeping strategies in place with a focus on partnership working.
12. Some areas, such as Doncaster, have effective arrangements in place to work through *complex individual cases*. These groups can be homeless-specific or have a wider complex needs brief, bringing together partner agencies to address specific cases where individuals may be in contact with multiple services at once.
13. However, we are aware of some areas with high numbers of people experiencing homelessness that have no forums or groups operating. These areas could do a lot more to tackle homelessness, with a disconnect between statutory and non-statutory agencies leading to a lack of partnership working and communication. In many cases this can lead to a misuse of resources, with local organisations duplicating work.
14. Further, there are other non-statutory groups without a primary focus on homelessness that could do more to address homelessness and the needs of people experiencing homelessness. For example, Sustainability and Transforming Partnerships (STPs) and Integrated Care Systems (ICSs) in the health and social care arena could do more to ensure that people are not discharged from hospital onto the street and work more closely with homelessness services to reduce and prevent homelessness and improve the health and wellbeing of people experiencing homelessness.

Question 2: How effective are the non-statutory structures in your area in meeting their stated objectives?

Sharing information

15. Generally, in areas where *homelessness/rough sleeping forums* exist there is improved communication between organisations, allowing them to address local issues more effectively than

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otherwise. *Multiagency complex case meetings* can also be effective at resolving individual needs where there are good working relationships between organisations present, and enthusiasm to commit to supporting individuals. However, these mechanisms are not appropriate for looking at strategic approaches to tackling the causes of homelessness across all related sectors.

16. Poor historical relations between local authorities and non-statutory agencies, and a lack of inclusivity around local agenda setting, have been highlighted as potential challenges where local authorities take responsibility for non-statutory accountability structures. Neutrally facilitated meetings may, therefore, be a more successful approach to delivering any new arrangements.

Example: Birmingham Homelessness Forum is chaired by Crisis. The forum provides an opportunity for updates ranging from rough sleeping, homelessness prevention and what steps are being taken to tackle local issues. Each meeting provides an opportunity for different organisations and agencies to provide detailed updates. Forums are held monthly and are well attended.

17. Specific challenges for *homelessness/rough sleeping forums* include:

- Lack of organisational capacity to commit to organising regular meetings and ensuring all organisations are aware of them.
- Difficulties in people being able to commit to chair meetings, and the effective use of time during meetings.
- Working across different authorities' areas, with little coordination between forums across areas that may be seeing similar issues and the same individuals.

18. We are aware of examples where forums have a dedicated resource to lead them. For example, in Bedford there is a dedicated inter-agency officer who facilitates Communities of Practice meetings with representatives from a range of local services. This role brings together others areas of work such as awareness weeks and developing partnership working opportunities with volunteers within the wider sector. Regular forum meetings are held to inform, update and review how homelessness is being tackled through a partnership approach.

Strategic decisions

19. It is unclear how effective current non-statutory structures are in acting strategically because of a lack of influence, a lack of ability to make decisions on funding and services, and inconsistent membership. For example, in some areas *Homelessness Boards* or *Homelessness Strategy Groups* exist, and while they may have the authority to hold service providers to account for their outcomes, they rarely have the authority to hold other parts of the system to account, e.g. criminal justice and mental health. Some of these boards have little to no public profile and are themselves often unaccountable to the overall level of homelessness in the area. Some also struggle to get key players involved, such as the NHS, Police and Probation, and, therefore, have limited effect.

Question 3: More generally, what are your views on whether these sorts of non-statutory structures can drive system change, support the reduction of homelessness in the local area and hold all local partners to account for delivering their commitments?

20. Currently, many non-statutory structures do not generally have the ability to drive systems change and support the reduction of homelessness. This is due to a lack of statutory buy-in, tensions between providers, and a lack of engagement from senior leaders. Ultimately, many of these issues are a result of a lack of adequate funding, which has dramatically reduced the capacity to develop sustainable joined-up initiatives. The process of bidding for short-term funding pots from central government has further undermined strategic multi-agency approaches to homelessness, with services developed with little consultation or reference to existing strategies.

21. However, some structures are effective in bringing together a wide range of partners, not just those in the homelessness sector. The MEAM approach³ and Fulfilling Lives⁴ have had a positive impact. In the 27 local areas MEAM works with across England, including the 12 Fulfilling Lives partnerships supported by the Big Lottery Fund, the voluntary sector, local authorities and statutory services are working together, drawing on their shared experience and voluntary organisations' close connections to their communities. The MEAM approach is a framework used by local partnerships across England to develop a coordinated approach to tackling multiple disadvantage in their local area. It focuses on creating long-term, sustainable change to the way that complex problems and systems are approached and understood.
22. These approaches are changing the way that services work and transforming people's lives. Better integration across the health, housing and social care sectors is a key solution to funding challenges. The MEAM work has demonstrated the positive impact a more coordinated approach can have on supporting people with multiple and complex needs. Areas with a coordinated approach to multiple needs recorded an average reduction in costs to wider services of 23% in the same time period. However, even with better co-ordination between services, local authorities need more funding to spend on these vital services.
23. A good example of partnership working and accountability is the Newcastle Street Zero Board⁵ which brings together key partners from across the city who have collectively developed a city-wide strategy. This includes the NHS, Police, the Newcastle City Council, Probation, housing and homelessness providers among others. The Street Zero Board have developed a joint city wide 4-year strategy to end rough sleeping in Newcastle by 2022.
24. Regional approaches in Manchester and Glasgow also seem to be having impact and are able to look at the wider "system" to address the needs of homeless people. The Greater Manchester Homelessness Action Network includes representatives from both statutory and voluntary organisations who have co-produced a strategy and implementation plan to work to end rough sleeping by 2020. The implementation plan has a specific reference to the criminal justice system highlighting the need to ensure 'leaving the care or duty of public sector agencies such as hospital, prison and the care system, ceases to be a reason for individuals to come street homeless.' However, although voluntary organisations welcomed this approach they highlighted the strategy does not focus on issues impacting the whole of Greater Manchester, despite including representation from 10 Local Authorities.
25. There are also good examples where local partners have come together to pool funding and develop new approaches. In Plymouth, Plymouth City Council has pooled budgets and created an alliance to support people with complex needs. This approach to collaborative commissioning and co-production has the potential to be very effective in ensuring that people get the support they actually need.⁶
26. **Multiple levels of local partnership working and accountability arrangements can be effective. Any new accountability arrangements should ensure that they complement existing arrangements where they are working effectively, and receive appropriate increases in funding. However, even if there are effective partnerships and arrangements in place to drive**

³ The MEAM Approach is a 'non prescriptive' framework, which is updated periodically based on learning and experiences from across the MEAM Approach network. While every local area considers actions under each of the seven elements, the specifics of what they choose to do will depend on local circumstances. It is currently being used by partnerships of statutory and voluntary agencies in 27 local areas across England.

⁴ The Fulfilling Lives programme is a £112 million investment over 8 years supporting people who are experiencing multiple and complex needs. The programme funds local partnerships in 12 areas across England to test new ways of ensuring individuals receive joined up and person centred services which work for them.

⁵ See <http://streetzero.org/>

⁶ See <https://campus.recap.ncl.ac.uk/Panopto/Pages/Viewer.aspx?id=df91ebad-4f28-4a8b-a24a-84b4137f90d3>

systems change and reduce homelessness, the structural drivers of homelessness such as local authority funding cuts, housing pressures and welfare reform must also be addressed.

Question 4: Which statutory structures and individuals with statutory roles in your local area currently have strategic and operational conversations about how individual services and interventions can help reduce homelessness?

27. There are a variety of statutory structures and individuals with statutory roles who have strategic or operational conversations about homelessness, although none discuss homelessness as their sole or even main area of focus.
28. Health and Wellbeing Boards (HWBs) have a vital role in improving the health and wellbeing of local populations. Currently, the priority given to homelessness on HWB agendas is often low, and a lot more could be done to directly improve the health of people experiencing homelessness and prevent homelessness. **Homeless Link recommends that there should be a strong interface between Health and Wellbeing boards and any new accountability structures.**
29. Safeguarding Adult Boards (SABs) and Multi Agency Risk Assessment Conferences (MARACs) hold operational conversations around homelessness. SABs lead adult safeguarding arrangements across their area, and work collaboratively with a variety of agencies to prevent abuse and neglect, and developing effective responses when this does occur. Specifically, SABs must commission safeguarding adult reviews (SARs) for any cases where an individual dies or is seriously injured, and abuse or neglect is suspected or known, including in the instances where people who are experiencing homelessness die. **SABs should be involved in any new accountability arrangements.**
30. **HWBs, SABs and MARACs should all have a focus on reducing homelessness and disadvantage and enhancing wellbeing of the whole population. They all need to contribute to plans and actions to reduce homelessness and have a focus on prevention.**

Question 7: For homelessness services alone, what are your views on how effective two-tier working is in your area, the specific challenges in two-tier working and/or the opportunities for strengthening joint working in two-tier areas?

- 4.1 Homeless Link members from relevant regions have consistently raised issues about the impact of two-tier authorities and the challenges this means in terms of effectively tackling homelessness, particular with responsibility around housing sitting at the District level and social care and strategic planning at the County level.
- 4.2 Funding decisions made at County level, such as the decommissioning of key services, can have a serious impact on the work undertaken at a District level. For example, in Hampshire the County Council are reducing spending by £1m a year from August 2019, with expectation that much work undertaken by the sector can be replaced through responsibilities under the Homelessness Reduction Act. Further, services operating at a District level can in instances be dealing with high numbers of commissioning bodies, rather than one, which makes reporting and stakeholder engagement much more difficult, time consuming and resource intensive.
- 4.3 **We echo the recommendation of St Mungo's submission that in two-tier authorities there should be a clear joint approach between District and County levels, with regional and sub-regional arrangements in place where appropriate.**

Homelessness Reduction Boards

Question 10: What are your views on the merits and drawbacks of establishing Homelessness Reduction Boards, and whether we should establish them?

Potential merits of establishing Homelessness Reduction Boards

31. Homelessness Reduction Boards have the potential to make a difference to levels of homelessness in a local area. Without an accountability structure, which brings statutory and non-statutory organisations together, it will be difficult to see how effective strategies can be developed and actioned which tackle homelessness in a locality. Homelessness Reduction Boards could deliver long-term and strategic approaches, ensure a joined-up and evidence-based approach to service provision, and hold all parts of the local system to account for their role in tackling homelessness.
32. A multi-agency approach needs to be adopted to truly tackle homelessness and a Homelessness Reduction Board could facilitate this effectively. One way to ensure all statutory partners take responsibility and are involved is to make them accountable at a local level and have their engagement and involvement as a requirement. Involving health, welfare, social care and criminal justice agencies is key to joining up systems. It will also be important to include housing and homelessness providers and people with lived experience as full participants.
33. New accountability systems must have responsibility for all forms of homelessness and ensure that it focuses on both reducing and preventing homelessness. For example, women's homelessness is often overlooked and it will be important for domestic abuse and VAWG services, multi-agency partners and existing structures such as Community Safety Partnerships and Child and Adult Safeguarding Boards to be involved.
34. A specific benefit of a partnership approach is to ensure that people's wider support needs are taken into account. Homelessness is not usually the only challenge a person faces; individuals often have additional needs which can include poor mental health, substance misuse and contact with the criminal justice system. These services working together effectively can reduce the gaps in services and ensure a holistic approach to someone's needs.
35. Other benefits of Homelessness Reduction Boards could be:
 - increased ability to hold local authorities and central government to account
 - improved consistency across the country of local approaches
 - formalise existing good practice
 - improved coordination of activity to reduce and prevent homelessness
 - improved coordination of funds that are available across the area
 - potential to improve ways of working with people across lower tier authority boundaries
 - improved communication between local authorities, enabling a more consistent approach.
36. **For Homelessness Reduction Boards to work effectively they will need to have the power to make decisions and changes. This could work effectively through adequate funding, pooling budgets, and improved guidance.**
37. Some Homeless Link members have also suggested that Homelessness Reduction Boards are set up across local authority boundaries in two tier and city areas. People experiencing homelessness often access services outside of their council's boundaries and the services that need to work effectively together, such as health, social care and criminal justice span across the council boundaries. **A requirement for local accountability structures to work with other local authorities in the surrounding areas or across the region could be effective.**

Potential drawbacks of establishing Homelessness Reduction Boards

38. Homeless Link members have highlighted some potential concerns with Homelessness Reduction Boards. There is a risk that a focus on local accountability structures will further shift responsibility away from central government for issues such as rough sleeping onto local authorities, when there is currently limited ability for local authorities and services to address many of the structural drivers of homelessness. For example, welfare reform has had a major impact on the numbers of people experiencing homelessness, and it is not in the gift of local authorities to change the rates of Local Housing Allowance or the design of Universal Credit. **It is important that central government retain responsibility and public accountability for addressing the structural causes of homelessness such as these changes to the welfare system, and Boards have the ability to hold central government to account and inform the national policies being created.**
39. There is a risk that Homelessness Reduction Boards may solely focus on reducing the numbers of people rough sleeping, and, as a result, may recommend increased temporary accommodation or crisis approaches to tackling rough sleeping or statutory homelessness which do not offer a sustainable end to homelessness. **Homelessness Reduction Boards will need to be focused on providing long-term trauma informed housing-led solutions for people experiencing homelessness and housing vulnerability, such as Housing First, and influencing local housing policy, such as local allocation policies for social housing.**
40. In some areas there is a high level of mistrust towards Local Authorities from the community and voluntary sector. **Homelessness Reduction Boards should therefore have specific guidance around who should be involved and all should show a clear commitment to tackling homelessness from a partnership perspective.**
41. Other potential drawbacks include:
- A lack of funding may constrain the ability of local services to reduce homelessness, with Boards becoming a way for commissioners to blame providers for outcomes outside of their control.
 - Without engagement from providers, housing associations and support services, progress may not be made.
 - There already exist a number of similar mechanisms and duplication (including time pressures for a number of key individuals) of these would add to confusion around delivery and responsibilities.
42. We agree with Clinks' position that the potential creation of Homelessness Reduction Boards in some areas but not others could exacerbate local variation in effective provision, making it challenging to have a consistent and uniform approach across the country. The likelihood of this will be increased if Boards are not mandatory.

Question 11: What do you think their purpose and objectives should be?

43. The purpose of Homelessness Reduction Boards should be to develop and enact a strategic approach to prevent, reduce and respond to homelessness so that everyone has a safe and truly affordable home and support to keep it.
44. Possible objectives could include:
- A focus on preventing homelessness and enacting long-term solutions
 - Support the delivery of local and national homelessness strategies
 - Setting future strategies, with ownership of these and responsibilities for stakeholders – including police and crime commissioner, mental health teams and substance misuse providers
 - Coordinating local homelessness services, ensuring effective pathways of support
 - Identifying needs locally (including through needs analysis using local data) and monitoring progress of services in overcoming these
 - Add value to the existing work of homelessness services

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- Ensuring services and support work effectively by using co-production approaches with people with lived experience and trauma informed approaches.

45. We support many of St Mungo's suggestions for how a Board would operate, such as mechanisms for co-ordination and accountability. This could be used as guidance to establish Homelessness Reduction Boards and provide consistency in approach.

Question 13: Who should be members of Homelessness Reduction Boards?

46. Boards should require statutory attendance from health, social care, welfare, probation, police and crime and housing. Homeless Link would also recommend engagement with homelessness, health and domestic violence services, housing providers and people with lived experience. It will also be important to have avenues for Boards to hold central government to account for wider structural barriers or causes of homelessness outside of the control of local areas. This will be particularly important around funding and welfare reform. To support this, attendees could include central government representatives.

Question 14: What is needed to make Homelessness Reduction Boards effective (e.g. guidance, legislation, incentives etc)?

47. Funding will be key to enabling Boards to have an impact, with funding from MHCLG (such as that relating to the Rough Sleeping Initiative and the Rough Sleeping Strategy) administered through Homelessness Reduction Boards. This would also ensure that this funding is coordinated more effectively and in line with local priorities and funded work.

48. Clear guidance could be provided to Boards, and follow up to make sure this is correctly understood, to ensure that there is consistency in Boards across the country and clarity for members on expectations. This would also support benchmarking of Boards across the nation if this approach is implemented.

49. Mechanisms will also need to be in place to feed back to central government on areas of concern, identifying where national policy is having a negative impact and restricting the ability of services to support people.

Other ways of supporting effective partnership working

Question 20: Do you think a Duty to Co-operate should be introduced and, if so, how do you think a Duty to Co-operate could be designed to work in practice, and what steps can we take to ensure that a duty is practical and effective?

50. Homeless Link would support the development of a duty to co-operate; however more information will be required to inform how this could work in practice and who the duties would apply to. A review of the current Duty to Refer could support this, including analysis of how partners not covered by the statutory Duty to Refer (such as GPs, the Police and Housing Associations) have worked in partnership with other agencies. For example, the National Housing Federation has developed the Commitment to Refer⁷, a voluntary commitment that their members can sign up to, that states that the housing association will refer an individual or household to a local housing authority if they are homeless or threatened with homelessness, to support the aims of the Duty to Refer.

⁷ Commitment to Refer guidance from National Housing Federation September 2018 [http://s3-eu-west-1.amazonaws.com/pub.housing.org.uk/Commitment to Refer – guidance for members.pdf](http://s3-eu-west-1.amazonaws.com/pub.housing.org.uk/Commitment%20to%20Refer%20-%20guidance%20for%20members.pdf)

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