

LGiU Homelessness
Commission 2019:
Final report

LGiU

The LGiU Homelessness Commission 2019 was jointly chaired by Cllr Peter Fleming, leader of Sevenoaks Council and Cllr Simon Blackburn, leader of Blackpook Borough Council.

The commissioners were:

- Robert Pollock, Director, Social Finance
- Ian Swift, Head of Housing Solutions, London Borough of Southwark
- Mike Wright, Strategic Lead for Homelessness, Greater Manchester Combined Authority
- Piali Das Gupta, formerly Head of Policy, SOLACE
- Matthew Wilkins, lead author of the National Audit Office's 2017 report on homelessness, acted as a commissioner in a personal capacity.
- Jonathan Carr-West, Chief Executive, LGiU

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LGiU is a local authority membership organisation. Our mission is to strengthen local democracy to put citizens in control of their own lives, communities and local services. We work with local councils and other public services providers, along with a wider network of public, private and third sector organisations.

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Introduction

The recent dramatic rise in homelessness across the UK is symbolic of national policy failure and the fraying of the social fabric. It is a sign that as a society we are allowing people to fall through the cracks.

In this report, the LGiU Local Government Homelessness Commission argues that we desperately need a proper housing and homelessness strategy, that addresses the underlying causes and gives councils the powers and resources they need to carry it out.

Homelessness is much more than rough sleeping

We are beginning to talk more about rough sleeping. The government has a rough sleeping strategy and a goal that no one will sleep on the streets by 2027. There were 4,677 rough sleepers recorded in 2018, a small reduction on the 2017 figure, but still a 165 per cent increase since 2010. There was an increase of 13 per cent in London in 2018 and a fall of six per cent in the rest of the country.

But rough sleeping is just the tip of the iceberg. It is the perhaps the most visible aspect of homelessness to the general public and it is a politically charged issue, but the real problem is far more extensive. According to Shelter there were 320,000 people recorded as homeless in Britain in 2018. That is 13,000, or four per cent, more than the previous year and means that 36 new people become homeless every day. Many people are in precarious situations known as “hidden homeless” which can involve moving in and out of hostels and emergency shelters, or sofa surfing, and so beyond the reach of most forms of support.

On 30th June the number of households in temporary accommodation was 82,310, up five per cent from 78,540 on 30th June 2017, and up 71 per cent on the low of 48,010 on 31 December 2010. Meanwhile the number of families in B&B style accommodation has more than tripled in the same time period. This has drastic effects on already vulnerable people. But it is also extremely costly. Local authorities in England spent £1.39bn on homelessness services in 2017-18¹. This is the cost of a reactive approach to acute social problems. That money would be far better spent on preventative services that stop people becoming homeless in the first place. There are also significant knock on costs. In 2015 Crisis estimated the average cost to the public purse, across a range of service areas, of a single homeless person rough sleeping for twelve months was £20,128².

Tackling homelessness and addressing its causes is a long-term project that needs to draw on partners and organisations from across the public sector. In short, it cannot be solved by homelessness services alone. The Homelessness Reduction Act (2017) has expanded the responsibility of English local authorities towards those deemed eligible and unintentionally homeless, requiring them to put “Personal Housing Plans” in place. This has brought welcome improvements to the process, but it does not amount to prevention. It addresses the issue at one point in the chain, when the risk of homelessness is already acute. As this report will show, prevention is a much wider, long-term project.

1 1. MHCLG RO4 Data

2 Crisis (2015) At what cost? An estimation of the financial costs of single homelessness in the UK

The Local Government Homelessness Commission

The LGiU Local Government Homelessness Commission was set up to investigate how councils can fulfil their obligation to prevent homelessness. This includes the duties under the HRA, but is actually much wider. It is the first assessment of the state of homelessness prevention from the perspective of local government, those who are tasked with actually implementing the policy and supporting some of the most vulnerable people in our society. The Commission was led by local government. Cllr Peter Fleming, leader of Sevenoaks District Council, and Cllr Simon Blackburn, leader of Blackpool Council, both LGiU members, were co-chairs joined by a panel of local government experts.

In a series of four evidence sessions held between October 2018 and March 2019 the Commission's investigation focussed on how councils use data as a homelessness prevention tool, strategies for supporting young people and other vulnerable groups, accessing sustainable accommodation, and finance and funding. We had evidence presented from Bristol City Council, London Borough of Hackney, London Borough of Croydon, Centrepoin, Social Finance, London Borough of Southwark, Liverpool City Region, CAPITAL Letters, Gloucester City Council, Dublin City Council and Crisis. Those evidence sessions form the basis of the arguments presented in this report.

Findings

Firstly, rough sleeping is just the tip of the iceberg. For every two people who are sleeping rough on the streets, there are 98 who are homelessness but hidden from view. There needs to be a change in the narrative and the strategic approach around homelessness to acknowledge that it is a deeper and more widespread issue than just rough sleeping. Until we change the way we talk about this crisis we will not have the political and strategic leadership that we need to tackle it.

Secondly, the Homelessness Reduction Act has had a positive impact. It has forced councils to think differently about the homelessness support they provide and has shifted the focus on to a wider range of support activities that draw together different parts of the public sector. But it is a missed opportunity that will not achieve its aims of actually preventing homelessness.

The HRA introduces a list of new burdens and duties to councils on the back of nearly a decade of funding reductions that have made it harder to prevent homelessness. The small injection of cash that accompanies it is both inadequate and temporary. The new duties are applied at a late stage, and as such they are reactive, rather than preventative. If the government is serious about tackling homelessness then we need a long-term plan and long-term funding.

This work is resource intensive. The finance that central government provides to councils is piecemeal, inadequate and does not provide a sustainable or certain source of funding for strategic planning in local government. Instead councils have to bid for small pots of money, tap in to limited and depleted pools of resource in other departments and generally work on a shoestring. But we cannot expect transformative change on a shoestring. As one of our commissioners said: "if we don't have the tools to get better outcomes at the end of the process then what's the point? We can extend the process, build in more reports, evaluate and monitor it all well, but if we don't have the housing stock, or the support services to make actual changes then so what?"

Strategy and resources?

Bob Blackman MP deserves a great deal of credit for bringing the HRA through Parliament. But the fact that the only legislation in recent years to address one of the country's most serious and damaging social issues was a private members bill is a telling indictment of government's lack of strategy and leadership. It does not constitute a joined-up strategy or government-led policy.

The Commission supports recent work by Shelter and others which argues that government can borrow to fund a wider programme of house building. But we need to go further. Without significant strategic funding the systems in place under the HRA will remain procedural. They will result in an improved assessment process, but with no ultimate outcomes because there is not the sustainable and affordable housing, mental health support, addiction services, or other infrastructure that will actually address the causes of homelessness.

The case study of the Republic of Ireland, later in this report, should give policy-makers pause for thought. In Ireland, prevention takes up a large chunk of funding, which is around double the per capita funding of the UK's homelessness spend. But the money is also spent more strategically, with cross-departmental and regional coordination of homeless services, as well as local discretion to vary housing benefit in order to sustain tenancies in the private sector.

The other key argument in this paper is that many of the drivers of homelessness are caused or exacerbated by central government policy, while local government is left to pick up the pieces. This is the result of poor policy choices where government has acted and by neglect where it hasn't. What funding there is is spent unproductively and inefficiently. A dysfunctional housing market, inadequate and badly administered welfare regime largely exemplified by Universal Credit and the Local Housing Allowance, and rising levels of poverty are some of the main factors that result in people losing their homes.

The fact that housing is unaffordable for so many people is surely one of the most decisive causes. More people become homeless because they lose their tenancy in the private rented sector than any other route. Local housing allowance rates are too low to cover rent in most of the country. In some areas, such as Blackpool, the Broad Rental Market Area, used to calculate benefit levels, covers a wider suburban and rural area with higher private rents than in the town centre itself. This distorts the private rented market in the town, allowing landlords to claim more through the benefit system than they might otherwise expect.

In response to the LGiU Local Government Finance Survey almost two thirds (61 per cent) of councils said that the lack of local variation in the Local Housing Allowance is causing problems in their local housing market. The issues vary across different authorities, from making it harder to tackle homelessness (45 per cent) and artificially inflating local rental prices (25 per cent), to encouraging rogue landlords (10 per cent) and causing a decline in the quality of local housing stock (10 per cent). Councils shell out vast amounts of money to house people in expensive temporary accommodation or to meet skyrocketing private rents. Something has to give, and we argue that it should be the UK's overly centralised system of governance. The report calls for greater devolution of powers to build houses, to combine budgets and control and vary the welfare regime so that it better reflects local housing markets.

Recommendations

1. A sustainable housing and homelessness strategy, with adequate funding.

Homelessness is a much bigger issue than rough sleeping. For every two people sleeping rough on the streets, there are 98 in shelters, temporary accommodation, bed and breakfasts, or moving between precarious forms of accommodation.

The narrative must change so that it encompasses all forms of homelessness. We need an approach that addresses the real, underlying issues, because just trying to tackle the problem we can see will not work.

Councils have been tasked with solving one of the big social and political challenges that we face, but with inadequate resources to take on the task. Funding for homelessness services is piecemeal, unproductive and fragmented. As a result there are various small pots of money that help to fund pockets of innovative practice. The HRA has had a positive impact on culture and on the processes within local authorities. But councils need certainty. Without funding to instigate real change in the outcomes, the HRA will only have created an 'assessment process', without achieving any of its stated aims. Meanwhile, government departments are not joined-up on the issue, exacerbating the lack of strategy between MHCLG, DWP, the Treasury, and the Department of Health and Social Care.

Therefore, as a matter of urgency, the government should commit itself to a coherent, combined housing and homelessness strategy with sustainable funding for local authorities to put preventative programmes in place. This must include a firm commitment beyond the 2020 deadline for new burdens funding.

2. Greater local variation of housing allowance

We are spending a lot of public money on homelessness, but it is largely wasted because it is being spent inefficiently and in the wrong places. Local Housing Allowance, in particular, amounts to a costly and inefficient transfer of public funds to private landlords and fails to achieve the goals of reducing or preventing homelessness.

In many parts of the country LHA rates are well below local market rents, while in some areas the rental market is distorted by how rates are calculated, bringing high and low demand areas together within the same bracket. This means that tenancies are unsustainable, conditions are too often poor, and councils cannot access decent accommodation to house people when they are at risk of homelessness.

Local government should, therefore, have the power to vary Local Housing Allowance rates to better reflect local housing market conditions. Greater local variation would be a far more efficient use of public money. It would enable more people to carry on living independently, as well as facilitating councils carrying out their homelessness duty in the private rented sector. In Ireland the government has transferred LHA to the Department for Housing, Planning and Local Government and away from the welfare department. Along with a large programme of investment in affordable housing supply, this represents a coherent strategic approach to housing and homelessness policy.

3. Private rented sector

The private rented sector is a rapidly growing part of the housing market and the breakdown of a PRS tenancy is now the most common route into homelessness. Meanwhile, recent policy changes have weakened the position of small-scale private landlords, who are a vital part of the housing market across the country. Something is not working, therefore, and the consequences are terrible for some people. This demands attention.

To address instability and uncertainty in the private rented sector, the government should introduce minimum three year tenancies. In return, the importance of good landlords should be acknowledged and they should be supported to stay in the market. This would provide greater long-term security and stability for people renting private sector housing.

The Residential Landlords Association has argued³ that landlords are not generally opposed to longer tenancies, but would like to see them combined with financial incentives and the ability to take possession of their properties in certain circumstances.

4. A homelessness prevention toolkit, designed around the needs of local government.

All too often people fall through the cracks between public services that are poorly joined up. Councils are responsible for bridging these gaps, but they need the tools to do so and accurate, useable information is essential. The current system of gathering and sharing information does not work, however. It is inconsistent, out of date, and often inaccessible.

To build a data toolkit for homelessness prevention, the government should invest in a project to identify what information local government needs, particularly from central government departments, where the information is held, and what would make it most useful for preventing homelessness. The project would consider how to join up data sets across the public sector in order to spot local and national trends. It would enable councils to do prevention better, but would also target public money and resources more effectively. The project should be led by councils and based on the experience of council staff and service users.

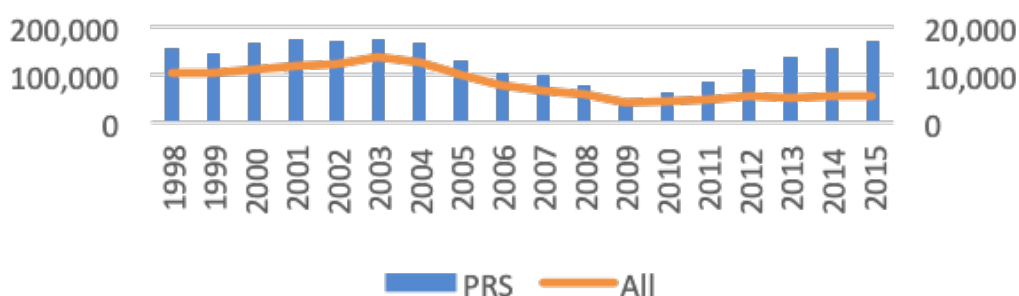
³ Residential Landlords Association (2018) Longer Term Tenancies in the Private Rented Sector

1. Drivers of homelessness

The rise in homelessness is predominantly driven by central government policy making and lack of strategic leadership. Local government is, once again, tasked with picking up the pieces, though without the powers or resources to tackle the issues head-on. There is no single driver of homelessness. It is increasing due to a combination of factors, including poverty, unemployed and in-work poor living in private sector tenancies, changes to the welfare system and related cuts in funding, a broken housing market and, crucially, a lack of clear and consistent homelessness strategy in government.

Growth of the private rented sector

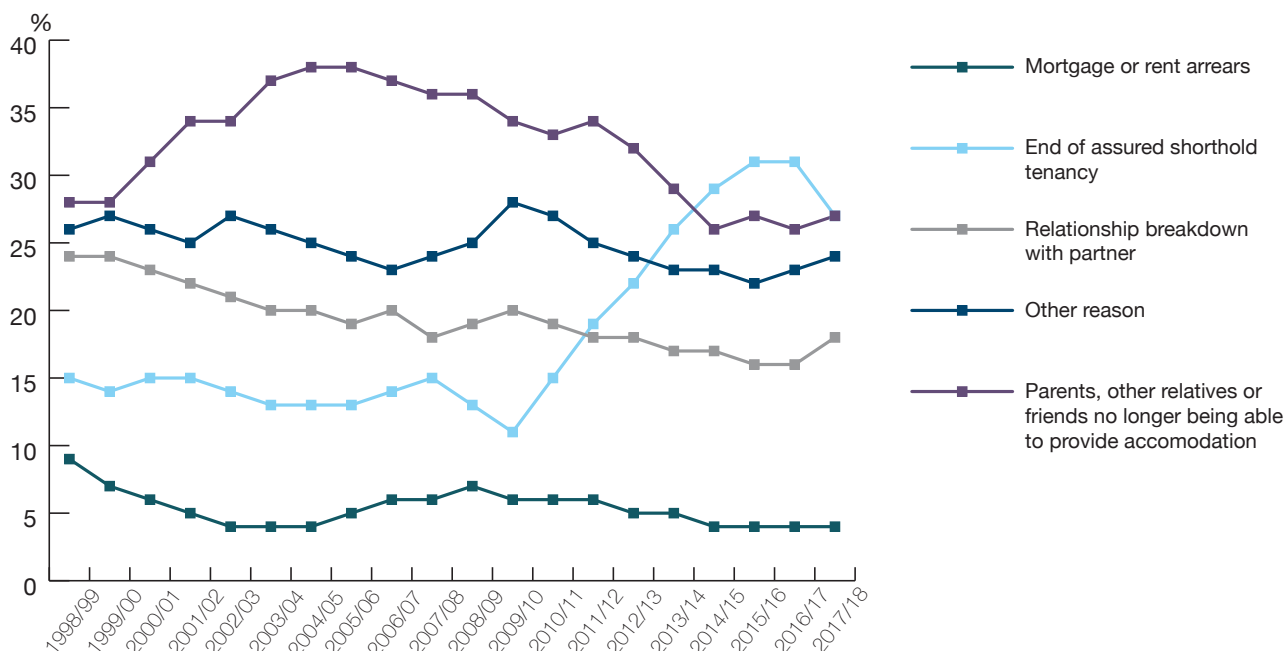
For the past few years the most common way in which people become homeless is by losing their tenancy in private rented accommodation. Since 2010/11 homeless acceptances due to the ending of an Assured Shorthold Tenancy have increased by 66 per cent⁴. The Policy Evaluation Research Unit notes that insecurity is widely seen as one of the key features of the Private Rented Sector. While most tenancies are ended at the request of the tenant, a significant proportion are ended by the landlord. The Government recently announced plans to prevent no fault evictions, whereby a landlord can end a tenancy without giving a reason. This is a welcome development, but it remains only an intention at this stage. As yet there is no legislation proposed to make it a reality. In any case, insecurity will remain an aspect of private renting for many, particularly vulnerable people and families on low incomes. The graph below, also from the Policy Evaluation Research Unit, shows the rise in homelessness acceptances from the Private Rented Sector and the rise in homelessness acceptances overall. Since 2009 there has been a significant increase in the number of acceptances from the Private Rented Sector (roughly three times higher), compared to the overall level of acceptances (roughly a third). The Localism Act (2011) gave councils the power to carry out their homelessness duty using accommodation in the PRS. The recent trends, shown below, indicate that without increasing the stock of social housing the PRS on its own is not a viable option to supply suitable accommodation to prevent and alleviate homelessness in the long term.



Change in numbers of all acceptances and acceptances following end of a PRS tenancy⁵

4 Ministry for Housing Communities and Local Government (2019) 'Acceptances and decisions live tables: January to March 2018 (revised)'. London: Ministry for Housing Communities and Local Government

5 Manchester Metropolitan University's Policy Evaluation and Research Unit (2018) Homelessness from the PRS



Reason for loss of settled home % (Source: MHCLG P1E Data)

Low housing supply

There is an undersupply of housing where it is most needed, along with a crisis in affordability. The House of Commons’ Library argues that “Homelessness is the most visible manifestation of the long-term failure of successive Governments to build enough housing to meet growing need.” Meanwhile, the proportion of housing that is at social rent levels has drastically declined, a trend that is exacerbated by Right to Buy and a lack of public investment in the sector.

The National Housing Federation (NHF) and Crisis have claimed that 340,000 homes are needed each year up to 2031 and that 145,000 of these must be affordable, with 90,000 for social rent. In 2016 Shelter argued that 250,000 new homes would be needed each year, with 30 per cent at a social rent levels. The Public Accounts Committee has criticised the government’s approach to homelessness as “unacceptably complacent”, as “limited action” that “has lacked the urgency that is so badly needed”. It goes on to stress that the government’s reliance on the legislation in the Homelessness Reduction Act will only succeed if there is also significant effort across government to tackle supply and affordability of housing, as they are the underlying causes.

Broken welfare system

Local Housing Allowance, the maximum amount that a household can claim in housing benefit in the private rented sector, is being rolled into Universal Credit and has faced a series of drastic cuts since 2011. This continued underinvestment in the housing welfare regime is an important factor in driving homelessness across the country, particularly alongside the growth in the private rented sector⁶. But the underlying issue is the disconnect between housing benefit and local market rates. Market rents vary significantly from place to place and the way LHA rates are calculated leads to a lack of corresponding variation in benefit and causes problems in local housing markets, as two thirds (61 per cent) of leaders and chief executives said in response to the LGiU 2019 Local Government Finance Survey. Forty-five per cent said the disconnect makes it harder to tackle homelessness and a quarter said it artificially inflates local rental prices.

6 National Audit Office (2017) Report by the Comptroller and Auditor General: Homelessness. London: National Audit Office
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In many areas councils shell out vast amounts of money to private landlords or to house people in expensive temporary accommodation or to meet skyrocketing rents. A recent Crisis report⁷ shows that there is a gap between LHA rates and rent for 98 per cent of working age households with children, in receipt of the payment. Across much of the country the gap between LHA rates and rents is increasing, so that two thirds of households in receipt of LHA experience difficulties⁸. LHA support, which covered 50 per cent of local rents in 2011, was quickly reduced to cover just less than the cheapest 30 per cent. Further reductions were followed by a freeze to the benefit from 2016-2020. The report finds that in almost all areas of Great Britain, only a fifth, often less, of PRS accommodation is affordable within LHA rates

Meanwhile, the Policy Evaluation and Research Unit at Manchester Metropolitan University finds that: “90 per cent of working age households with children face a gap between their LHA rates and the rent they are paying; this is a group increasingly dependent on the private rented sector for accommodation. It is also the case that working, low income households are being affected.” This also has an impact on the number of households that become homeless from the PRS. There is a two-pronged effect in which LHA recipients are more likely to have their tenancies ended by landlords, as well as not to have them renewed. They also find it more difficult to access secure, sustainable accommodation as LHA recipients.

Yet this masks the variation between local areas and regions. In London and the South East, where the problem of affordability is particularly acute, the gap is large and growing. But in other areas where there is low demand for housing, such as Blackpool and other coastal towns, LHA rates are often above actual local rents because they are calculated according to wider market area. Survey respondents in these areas reported that this can exacerbate the problem of rogue landlords and poor conditions. In both cases, a lack of variation and local control over housing benefit means that the public money is being used to subsidise landlords in a dysfunctional housing market.

Universal Credit is also a particular problem for homelessness prevention. Many people are likely to face delays in their payments and reductions are making it increasingly difficult for young people to find stable, long-term accommodation. Many end up in rent arrears, while private landlords often refuse to accept tenants who are Universal Credit recipients. This has an impact at both ends of the scale. It places many at risk of losing their accommodation and becoming homeless, but it also makes it harder for young people to move on from temporary or supported accommodation.

Young people and other vulnerable groups often fall through the cracks of a fragmented and overly centralised public sector.

Young people who are leaving care often get missed by important public services that that might rely on. Last year 28 per cent of Centrepoin service-users were care leavers, many of whom move from care directly to supported housing, so are not necessarily identified as homeless, but others have more difficult transitions, which can be particularly chaotic. All young people need something different and tend to move regularly between options, such as temporary accommodation, the private rented sector, council housing and supported accommodation. Tracking and supporting young people through this journey, ensuring they are properly supported, is a key challenge for councils.

The fragmented public sector is failing care leavers, therefore, but also those leaving the armed forces or the criminal justice system, and often people who rely on multiple services. The lack of coordination between central government departments, particularly the Ministry of Housing Communities and Local Government, the Department for Work and Pensions and

7 Basran, J. (2019) Cover the Cost: How gaps in Local Housing Allowance are impacting homelessness. London: Crisis.

8 National Audit Office (2017) Report by the Comptroller and Auditor General: Homelessness. London: National Audit Office
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the Home Office, is acute. Local government picks up the pieces and bares the cost of this policy failure.

There are a range of important factors that impact particularly on vulnerable young people. Family breakdown is the biggest cause of homelessness among young people. Over half who presented in 2017/18 had recently been asked to leave their home by a parent or guardian and it was the principle factor in 30 per cent of cases. But this needs to be examined carefully as it is a complex area. Many families will have experienced low-level or higher-level problems for a long time, which means that early, careful intervention is essential.

Young people are more likely to be sofa surfing (hidden homeless) than rough sleeping as they often have friends or other contacts who can put them up. This often means it takes longer for them to seek help and to come to the council's attention. Low levels of education, employment and training is a significant factor for many young people, which can make it challenging to build a stable and independent life. There can be significant difficulties in accessing adequate NHS services. Mental health issues, problems sleeping, substance misuse occur regularly among young people. These are exacerbated by the recent rise in levels of food poverty. Young homeless people are also vulnerable to exploitation by gangs or loan sharks and can end up on the wrong side of the criminal justice system.

2. Homelessness Reduction Act

The Homelessness Reduction Act (HRA) will not prevent homelessness. It has, since 3 April 2018, placed new duties on local authorities to step in when families and single people, regardless of their priority need, are threatened with homelessness. The government has made £72.7m available in new burdens funding to support councils in addressing these responsibilities up to April 2020. In our evidence sessions, we heard that the HRA has created an “assessment process”, which has changed the outlook of homelessness teams, orienting them towards prevention. However, it does not address the main underlying causes of homelessness. After years of funding reductions across the sector, and very little access to affordable housing, the Act gives councils extra duties towards vulnerable people at the point of crisis, but no powers or resources to stop them getting there in the first place.

Under the Act, councils with housing responsibilities are required to:

- Work to **prevent** for **all** eligible applicants who are threatened with homelessness, i.e. likely to become homeless within 56 days.
- Work to **relieve** homelessness for all eligible applicants who become homeless.
- Local authorities are required to **agree a personalised plan** for all eligible applicants which should identify reasonable steps that the individual and local authority will be expected to take to prevent homelessness.
- **Housing authorities have a duty to provide or secure the provision of advice and information about homelessness and the prevention of homelessness.**

The new burdens funding that has been provided to support initial implementation of the Act has established a process around working with people when they are at risk of homelessness. There is a procedural requirement that a “Personal Housing Plan” be drawn up for each individual presenting to the council. But if councils cannot rely on there being something concrete at the end of that process, whether it be secure and sustainable accommodation, or decent and intelligent services to address individual needs, then the process is largely pointless.

One of our commissioners said “if we don’t have the tools to get better outcomes at the end of the process then what’s the point? We can extend the process, build in more reports, evaluate and monitor it all well, but if we don’t have the housing stock, or the support services to make actual changes then so what?”

A recent survey by the Local Government Association⁹ found that the HRA has led to more households in England placed in temporary accommodation, as well as increasing the burden of bureaucracy for councils. This comes with additional administrative costs, taking resources away from other intervention and prevention work. A year on from the implementation of the Act, eight out of 10 councils said the number of people presenting themselves to the authority as homeless had increased and there was an increase in the number of placements in temporary accommodation in 60 percent of councils.

Analysis by The Big Issue¹⁰ shows a wide range in the number of approaches made to councils during the first year. According to the figures, based on Freedom of Information requests, Bradford had the most approaches (7,734), while Leeds prevented the most

⁹ LGA (2019) Councils warn of rise in temporary accommodation use since Homelessness Reduction Act

¹⁰ The Big Issue (2019) Revealed: FOI requests detail impact of the Homelessness Reduction Act

households from becoming homeless (2,871) while also relieving 862 households that were at risk of losing their home. The fewest approaches was in Swale in Kent where just 18 households approached the council under the act.

The Act also introduced a Duty to Refer, under which authorities may also receive notifications from certain public bodies where they believe a service user may be homeless or threatened with homelessness. The public authorities subject to the duty to refer are specified in the Homelessness (Review Procedure etc.) Regulations 2018 and include:

- prisons;
- youth offender institutions;
- secure training centres;
- secure colleges;
- youth offending teams;
- probation services (including community rehabilitation companies);
- Jobcentre Plus;
- social service authorities;
- emergency departments;
- urgent treatment centres; and,
- hospitals in their function of providing inpatient care.¹¹

The Duty to Refer would be more effective, the Commission heard, if it was extended to include all public sector organisations. The Duty to Cooperate between the referring body and the council should also be promoted and strengthened to ensure that more bodies engage in prevention and alleviation.

Key measures in the Act include:

- An extension of the period during which an authority should treat someone as threatened with homelessness from 28 to 56 days, and clarification of the action an authority should take when someone applies for assistance having been served with a section 8 (1) or section 21 (2) notice. These provisions represent a shift in focus to early intervention, and aim to encourage local housing authorities to act quickly and proactively, addressing some concerns that some previously only intervened at crisis point.
- A new duty to prevent homelessness for all eligible applicants threatened with homelessness, regardless of priority need. This extends the help available to people not in priority need, with local housing authorities supporting them to either stay in their accommodation or help them find somewhere to live and should mean fewer households reach a crisis situation.
- A new duty to relieve homelessness for all eligible homeless applicants, regardless of priority need. This help could be, for example, the provision of a rent deposit or debt advice. Those who have a priority need will be provided with interim accommodation whilst the Local Housing Authority carries out the reasonable steps.

- A new duty on public services to notify a local authority if they come into contact with someone they think may be homeless or at risk of becoming homeless. It is hoped that this measure will ensure that a person's housing situation is considered when they come into contact with wider public services, and encourage public services to build strong relationships based on local need and circumstances.

The new Act has built on two major pieces of homelessness legislation:

- The Housing (Homeless Persons) Act 1977 defined homelessness for the first time and placed duties on local housing departments to house people with dependent children and other vulnerable people.
- The Homelessness Act 2002 extended entitlements to rehousing to a wider group of 'single' homeless people, including care leavers and people fleeing violence. It introduced an essential strategic approach to homelessness prevention.

The new Homelessness Reduction Act goes further and sets out new duties, made up of 12 primary sections, on English local authorities with the aim of preventing homelessness. The Act extends to England and Wales, but will only apply in England.

Section 1: Meaning of “threatened with homelessness”

Section 1 sets out the circumstances whereby households are threatened with homelessness, and therefore, when they should be offered support from local authorities to try and prevent them from becoming homeless. It extends the period during which someone might qualify as being threatened with homelessness from 28 days to 56 days. It also establishes a duty to treat an applicant as threatened with homelessness if they present a valid section 21 notice that expires in 56 days or less. For background, a section 21 notice, as set out in the Housing Act 1988, is a notice used by landlords to evict tenants and to gain possession of a property that is let under an assured shorthold tenancy when the tenants have not violated the terms of the tenancy agreement. The prevention duty continues to be owed until the local housing authority brings it to an end for one of the reasons set out in section 4, even if 56 days have passed.

Section 2: Duty to provide advisory services

Section 2 extends the existing duty on local authorities to provide free homelessness advice and information to any person in their local authority area. This should include advice and information on preventing homelessness, securing accommodation when homeless, the rights of homeless people or those threatened with homelessness, the help that is available from the local authority or others and how to access that help. It also requires advice services to be designed with certain vulnerable groups in mind. This includes care leavers, victims of domestic abuse, people released from prison or youth detention accommodation, former members of the armed forces, people leaving hospital and those suffering from a mental illness or impairment.

Section 3: Duty to assess all eligible applicants' cases and agree a plan

Section 3 sets out the process that councils must undertake with all applicants, regardless of priority need, to agree a homelessness plan. This will require local authorities to carry out an assessment in all cases where an eligible applicant is homeless, or at risk of becoming homeless. Following this assessment, the council must work with the person who has applied for help to agree the actions to be taken by both parties to ensure the person has, and is able to, retain suitable accommodation.

Personalised plans have already been introduced in Wales, and some local authorities in England are taking a similar approach. The Ministry of Housing, Communities and Local Government (MHCLG) has stated that they will apply the learning from these examples in developing the detailed guidance on how this measure should be implemented.

Section 4: Duty in cases of threatened homelessness

Section 4 sets out a duty on councils to take reasonable steps to prevent homelessness for any individual, regardless of priority need, who is at risk of homelessness. This means either assisting them to stay in their current accommodation, or helping them to find a new place to live. This requirement interacts with section 1, as the duty applies to eligible applicants who are considered as being threatened with homelessness 56 days before they are likely to become homeless. This duty also sits alongside other measures, in particular the non-cooperation measure that will encourage those who are homeless or at risk of becoming homeless to work proactively with their local authority, and the duty on local authorities to provide advice and information.

Section 4 also sets out the circumstances under which an authority's duty to prevent homelessness may be brought to an end by the service of a written notice. This includes the local authority being satisfied that suitable accommodation has been secured where there is a reasonable prospect of that accommodation being retained for six months (or a longer period up to 12 months if prescribed in regulations).

Section 5: Duties owed to those who are homeless

Section 5 places a duty on councils to relieve homelessness for all eligible households, regardless of priority need. This involves taking reasonable steps to help the applicant to secure suitable accommodation. The duty lasts for up to 56 days. This help could be, for example, the provision of a rent deposit or debt advice. This section also alters the interim accommodation duty that councils currently owe to homelessness applicants in priority need.

Section 6: Duties to help to secure accommodation

Section 6 interacts with the new prevention and relief duties outlined in sections 4 and 5. It provides councils with the flexibility to assist in resolving people's housing issues by providing support and advice to households, who would then be responsible for securing their own accommodation. It still remains open to the local authority to secure accommodation for eligible applicants where appropriate. Accommodation must be suitable where the council has secured or helped to secure it.

Section 7: Deliberate and unreasonable refusal to co-operate: duty upon giving of notice

Section 7 sets out the actions a council can take if an applicant who is homeless, or threatened with homelessness, deliberately and unreasonably refuses to take any steps set out in the personalised plan. It also sets out the procedure and duties which apply if an applicant who is homeless refuses, at the relief stage, a suitable final accommodation offer.

Section 8: Local connection of a care leaver

Section 8 makes it easier for care leavers to show they have a local connection with both the area of the local authority responsible for them and the area in which they lived while in care, if that was different.

Section 9: Reviews

Section 9 extends an applicant's right to request a review of their local authority's homelessness decisions, so they apply to a number of decisions that a local authority might make when discharging the new prevention and relief duties.

Section 10: Duty of public authority to refer cases to local housing authority

Section 10 requires public authorities, specified in regulations, to notify a local authority of service users they think may be homeless or at risk of becoming homeless. The public authority will need to gain the consent of the individual before referring them. Individuals will be allowed to choose which council they are referred to.

Section 11: Codes of practice

Section 11 enables the Secretary of State to produce mandatory codes of practice dealing with local authorities' functions in relation to homelessness or homelessness prevention. It also allows future codes to apply narrowly to specific councils.

Section 12: Suitability of private rented sector accommodation

Under section 12, local authorities must ensure certain suitability requirements are satisfied when they secure accommodation for vulnerable households in the private rented sector.

3. Data

We need a more intelligent and strategic approach to data in the public sector. Some councils use data as an effective tool for coordinating and planning preventative work around homelessness, but in too many areas the data is fragmented and poor quality. There is also an incipient perception of public sector data collection as problematic, often referred to under the banner of 'predictive analytics'. However, more effective use of historic data to better understand the drivers of homelessness in local areas is far simpler to undertake, less problematic and can be equally useful at targeting resources at groups and individuals at risk of homelessness. Local and central government need to get better at making the case for data usage as a crucial component of a homelessness prevention toolkit.

With a wider range of people with different needs and risks who require preventative support under the HRA, using data to better support housing advice services and predict homelessness has become a pressing imperative. The Commission heard how some councils are using data and technology to understand shifts in circumstances, population and demographics to design early, tailored prevention work. It is particularly important to help build understanding of changes in areas like the private rented sector, welfare, personal and household debt, and Universal Credit.

There is a lot of good and innovative work going on in local government, which needs to be celebrated and built on. But it's a complex area and we need to do a lot of careful work across local government to go through the stages, build capacity, get the basics right, and make sure that we really make the case for data as a crucial component of homelessness prevention.

Data collection is especially useful if local authorities use this in connection with homelessness 'trigger points'. Trigger points can vary across local authorities and we need to develop more sophisticated and 'weighted' analyses in many council areas. Debt, for example, is a key driver of homelessness and financial independence and poverty reduction should be a starting point.

And because poverty is caused by a broad range of social factors it is a cross-departmental responsibility to alleviate these pressures, not just a job for homelessness teams. Furthermore, Universal Credit could have an adverse impact on homelessness when it is rolled out, with debt levels predicted to increase among those already vulnerable. Local authorities are also worried that they risk losing important data in the transition to the new welfare regime.

While some councils are doing innovative and forward thinking work to harness the potential of good data in homelessness prevention, the vast bulk of the local government sector is not at this stage. Most councils do not yet have the capacity, resources or the infrastructure to begin thinking about how to use data like this and it is. Capacity needs to be developed, therefore, but it is important that local authorities do not stop trying to influence the structural social issues that lead to homelessness. This is particularly pertinent as, even with a far more sophisticated use of data, people in crisis are often only provided with a limited number of options by their council. Hackney Council provided a lesson about getting the basics right before trying anything too advanced, which is a salient one, and some careful support for other authorities to build their capacity in stages would be extremely useful.

Councils hold a lot of extensive data but may not always have the capacity to analyse it. This capacity will need to be built into the services that they provide. Training and upskilling is increasingly necessary, for staff at all levels to know how to use and share data effectively as a tool for preventative work, and perhaps fundamentally to understand what counts as a priority hazard. Councils should incorporate service design to ensure that processes and human contact within the system are as intelligent as possible. Furthermore, it should not

just be for Housing Options teams to provide all the answers and own the data. It requires lots of integrated partnerships with organisations across the public sector. There are cracks in the system that allow people to get missed. The Commission was told that most people who report to councils as at risk of homeless already have contact with someone in the public sector or have a social worker attached to them in some capacity.

Language is key and good dialogue with citizens is vital. It is particularly important to demonstrate to the public the value of predictive and preventative work. Indeed, one of the key challenges currently is how data collection is perceived by the public. There have been recent concerns over the use of personal data by councils, for example, and well publicised disputes about how the public sector uses personal information such as health records. Not to mention the stories about Facebook and Cambridge Analytica. In this environment the panel agreed that we in the public sector need to make the positive case for using data about citizens. This should outline the benefits that this can bring particularly with regard to preventative programmes in homelessness. Local authorities have always held a lot of disparate data about people and it is necessary to make the public aware of this. We also need to demonstrate the reasons behind collecting and using this data in order to try to help make vulnerable peoples' lives better. This should help to mitigate fears and to build a more constructive dialogue.

One of the major challenges is trying to connect data from different databases in order to have a comprehensive picture of an individual or family's situation, and therefore to identify the most vulnerable before they become homeless. Unfortunately public sector data is not always very good quality, often due to statutory requirements, and it is both hard to access and to compare. HCLIC, the government data base introduced alongside the HRA does not record a large proportion of people who report to local authorities. As well as being incomplete, it is held in a format which is difficult for councils to access or read, so that officers often have to enter and read data manually, or go through laborious duplication.

4. Young people and high needs groups

According to Centrepoin 103,000 young people approached their council in 2017/18 to say they were at risk of homelessness. Around 13 per cent of these people were accepted as statutorily homeless, while 35 per cent received prevention and relief support. Just over half did not receive documented help from the council.

It was acknowledged at the outset by the Commissioners that local authorities have a lot to answer for as a sector because young people should not end up homeless before the age of 25. Council responsibilities towards everyone deemed at risk of homelessness have expanded significantly under the Homelessness Reduction Act (2017). This means that all young people (aged under 25) presenting as homeless or at risk of homelessness must now be assessed by a housing officer.

There are a number of key policy areas that have a big impact on youth homelessness, such as low levels of education, employment and training, poor health, poor mental health, substance abuse, contact with the criminal justice system. All of these can combine in complex ways and at key times in a young person's life, when they are taking school exams or leaving home.

Abigail Gill from Centrepoin told the Commission about some of the key issues and challenges around preventing homelessness among young people. Family breakdown is the biggest cause of homelessness. Over half who presented in 2017/18 had recently been asked to leave their home by a parent or guardian and it was the principle factor in thirty per cent of cases. But this needs to be examined carefully as it is a complex area. Many families will have experienced low-level or higher-level problems for a long time, which means that early, careful intervention is essential.

Young people who are leaving care often fall through the cracks. The Commission heard that 28 per cent of Centrepoin service-users are care leavers. Abigail Gill said that when they spoke to care leavers to determine what support was needed and what the barriers were, it became evident that during the transition young people move on from having a social worker to having a personal advisor. This can strain the relationships. Once care leavers come to Centrepoin, local authorities consider them to be safe and therefore no longer in need of a personal advisor. Disruption to education can also be significant, as when young people turn 18 they leave care and move out of their foster home, regardless of what point in the school year they are.

Education levels and low rates of employment and training can be significant factors for many young people, which can make it challenging to build a stable and independent life. There can be significant difficulties in accessing adequate NHS services. Mental health issues, problems sleeping, substance misuse occur regularly among young people. These are exacerbated by the recent rise in levels of food poverty. Young homeless people are vulnerable to exploitation by gangs or loan sharks and can end up on the wrong side of the criminal justice system.

All young people need something different and tend to move regularly between options, such as temporary accommodation, the private rented sector, council housing and supported accommodation. Tracking and supporting young people through this journey, ensuring they don't fall through the cracks, is a key challenge for councils.

Young people are more likely to be sofa surfing (hidden homeless) than rough sleeping as they often have friends or other contacts who can put them up. This often means it takes longer for them to seek help and to come to the council's attention.

Universal Credit is also a particular problem for homelessness prevention. Many people are likely to face delays in their payments and reductions are making it increasingly difficult for young people to find stable, long-term accommodation. Many end up in rent arrears, while private landlords often refuse to accept tenants who are Universal Credit recipients. This has an impact at both ends of the scale. It places many at risk of losing their accommodation and becoming homeless, but it also makes it harder for young people to move on from temporary or supported accommodation. The Commission heard from London Borough of Southwark who are facing problems with the amount they spend on temporary accommodation and with reduced housing stock, which makes the council increasingly reliant on the private rented sector.

There are structural problems that lead to young people becoming homeless, and more needs to be done to prevent this. Central government departments, in particular, are notoriously bad at working together to tackle issues that cut across policy areas and places. In a recent report Crisis outlined¹² how a strategic approach to homelessness prevention requires all of government to work together. It cannot just be a job for homelessness services. The same goes for local government. Poor connections between councils and criminal justice organisations, especially community rehabilitation companies, can be devastating. Young people are often released on a Friday afternoon, with just £46 in their pocket and no housing lined up.

While many young people often miss out on the support they need because budgets have been cut, there are ways that councils can work to ensure departments and service areas are talking to each other. Cllr Stephanie Cryan, cabinet member for housing at London Borough of Southwark, told the Commission about the council's strategy which does just this. Seventy per cent of homeless people who present to authorities are single, and Southwark does not place them in B&Bs. The housing benefit does not cover rent in Southwark, while shared accommodation often does not comply with health and safety regulations.

Moreover domestic violence is the third leading cause of homelessness in the borough but the council has committed to empowering the victims to decide whether they move out of their home or whether they choose to remain. Victims are, however, still vulnerable to abuse and homelessness, particularly if the tenancy is in the abuser's name and the council is working to alleviate these issues in the borough. Crisis has been campaigning for the extension of "priority need" in homelessness assessments to encompass victims of domestic violence¹³. Councillor Cryan stressed that Southwark has learnt from the implementation of the HRA, particularly that prevention is better than cure. Southwark has been particularly successful in establishing new programmes and working with partners like Shelter, due in large part to the Trailblazer funding the council received from the government. This was crucial in facilitating culture change within the council. Other local authorities lack these funds however. They must learn from the work that Southwark and others have done, but it will be challenging.

The Commission also heard from Rachele Angeline of Social Finance, who told us about social investment projects focussing on young people who are not in education, employment or training. These projects, outlined further in the case study, brought together multiple partners to support young people with complex needs in this area. Nearly 2,000 people participated in the programme, which was additionally used to collect evidence about how best to deliver joined-up homelessness services.

Many of the participants had complex needs such as a history of mental health problems, criminality or substance abuse, yet had fallen through the cracks of being helped by their local authorities. A significant proportion of them were also care leavers whom had been discharged from their local authority. Three years were set aside for the programme in order to

12 Crisis (2018) Preventing homelessness: It's everybody's business

13 APPG on Domestic Violence and Abuse (2018) Campaign Briefing

measure the stabilising effects that services had on them and the ways they could address the gaps between service areas. This demonstrated success, but indicated that to tackle complex social problem effectively, the government must commit resources over the long-term.

5. Accommodation

Without access to affordable and sustainable accommodation for homeless people or people at risk of homelessness, councils will not be able to fulfil any goals around reducing or preventing the crisis. The HRA was designed in part to reduce the pressure on temporary accommodation. This will be challenging without an increase to the supply and quality of affordable housing more generally as well as new approaches for councils to address issues in the private rented sector. Piecemeal and uncoordinated action on the part of government is inadequate to address the challenge.

There were 79,880 households in temporary accommodation at the end of March 2018, which includes 123,230 children, a 65 per cent increase since 2010. Meanwhile the number of families in B&B style accommodation has more than tripled in the same time period. The Homelessness Reduction Act, which came into force almost a year ago, was designed in part to reduce the pressure on temporary accommodation, which is expensive and in increasingly limited supply.

Data from Homeless Link shows a 30 per cent fall in the number of bed spaces in accommodation projects for single homeless people, including hostels, from an estimated 50,000 in 2008 to 35,000 in 2017. Meanwhile, according to Centrepoint research, 86 per cent of local authorities do not think there is enough accommodation in their area suitable for young people with high support needs and 68 per cent of authorities say that a lack of accommodation is a barrier to carrying out their homelessness duties.¹⁴

Accessing temporary accommodation is particularly challenging in London, where the rates of homelessness are above the average for the country as a whole and the housing market is sky high. A smart approach is therefore essential. There are several well-known individual examples to look to across London, the modular units on meanwhile sites in Lewisham¹⁵ being just one. But a partnership between the boroughs will surely be an essential component of joining up and tackling the problem across the city as a whole. And that's where Capital Letters comes in. Capital Letters¹⁶ is a not-for-profit organisation, which has been set up by London Councils to procure new properties for temporary and other forms of accommodation on behalf of London boroughs collectively.

Mark Baigent, director of CAPITAL Letters gave evidence to the Commission about the venture. Money has been allocated for the project using top-sliced National Homelessness Support Grant from MHCLG, which totals £33m but is being fed in at performance-related intervals. Procuring temporary accommodation in London is opportunistic and expensive and boroughs often end up looking in other parts of London. Rather than competing with one another and by collaborating, member councils can help to shape the market, use resources effectively, and hopefully help more households to access the shelter they need. The properties Capital Letters accesses are expected to be a mixture of private rented leased directly to households nominated by the council, and properties leased by councils from landlords or from managing agents. By collaborating the risk is pooled and member boroughs will also be able to transfer existing leased properties into Capital Letters, which as a private landlord will be eligible for 100per cent Local Housing Allowance (LHA). The initial ambition was to have eight boroughs signed up within first year, already there are 14.

But accessing secure and sustainable housing goes beyond temporary accommodation. The Commission was keen to hear about alternative approaches, and one in particular which

14 Centrepoint (2018) *The Homelessness Reduction Act: Will it Work for Everyone?*

15 <https://www.lewisham.gov.uk/news/Pages/Innovative-affordable-homes-opened.aspx>

16 <https://www.londoncouncils.gov.uk/our-key-themes/housing-and-planning/capital-letters>

is growing in prominence and support across the World. Kate Farrell, strategic adviser on homelessness to the Mayor of Liverpool City Region, told the Commission about the Housing First (HF) pilot¹⁷ that she is leading.

The fundamental aim of the HF model is to support vulnerable people to find sustainable tenancies in stable properties. From this secure base other services and forms of support can be put into place. During the feasibility study for the pilot in LCR the team found that 379 people in Liverpool had been through four or more placements over four years, while some had been through more than 10. This is the HF cohort and the scale shows that the system is not working. The HF cohort is largely made up of people who have been consistently failed by the system as it stands, and Kate argued that we need to understand their stories far better than we currently do, in order to understand how we got to the stage where things were going so wrong for so long, and so that a pilot such as this was needed so badly.

The LCR pilot is a high-fidelity model, meaning it sticks to the key principles of Housing First, demanding a well-trained and supported workforce made up of small teams with low case-loads, each supporting maximum 20 people. They also have a second tier mental health support worker available and provide 24 hour support to give confidence to partners, particularly private landlords.

A huge culture shift is necessary, however, for staff and frontline workers in order to change and flex to the HF principles. Perhaps the most significant shift that is needed is in how we view this kind of homelessness support. It should not be seen as a “homelessness strategy”, but rather as part of a wider and integrated housing strategy. The problem is that the service has been contracted and monetised in this form for so long and homeless people are regularly separated from housing programmes more generally. People often are or have been housing tenants at some point, and when they come for support they get sent to social services, who are often unable to help.

There are lots of encouraging things going on in local areas to help mitigate the homelessness crisis, and to find ways of preventing it. Housing First is an international model with a demonstrable track record of success. It is applied by Liverpool City Region on a high-fidelity basis and is also being pursued in other parts of the country. CAPITAL Letters is another innovative and promising scheme that should really help cash-strapped councils in London to access suitable and, crucially, sustainable, accommodation for people at risk of homelessness. But relatively small-scale projects like this will not solve the crisis. Small pots of funding are available, for rough sleeping social investment bonds, trailblazer funding, HRA grants, Housing First pilots, for example. But they are not sustainable, do provide much local flexibility and can be counterproductive as they distort existing local initiatives. Without significant investment from the government and a system for sharing the lessons and practices, it is difficult to see how they will be scaled-up to the level of a national strategy.

¹⁷ <https://www.liverpoolcityregion-ca.gov.uk/what-we-do/homelessness/>

6. Funding

There is insufficient funding to tackle the homelessness crisis. If the government is serious about addressing this issues, as it should be, then it needs to invest and make sure the resources are available in the right places. It is simply not good enough to pass the burden to local government without adequate financial backing.

The Commission consistently heard that long-term underfunding from central government, a broken system of Local Housing Allowance, a lack of strategic coordination and overly centralised financial control all coalesce to hamper the efforts of local authorities. Once again problems that are caused by central government policy are passed on to be dealt with by local authorities, without the resources or the powers to take on the challenge. As one of our commissioners said: “When you introduce something that’s supposed to be game changing you can’t do it on a shoestring and you have to provide the thinking space to develop it”.

In the LGiU annual Local Government Finance Survey 23 per cent of councils said that housing and homelessness was their greatest short-term financial pressure. Among councils without adult social care responsibilities 37 per cent said it was the most immediate short-term pressure and 23 per cent said it was the biggest long-term concern. Eleven per cent said they were planning to reduce homelessness services further in light of budget constraints. Against the background of serious and drastic cuts to local government funding over the last 10 years, the amount that councils spend on homelessness services has reduced by 27 per cent since 2008/9. According to research by St Mungo’s and Homeless Link¹⁸, local authority homeless services for single people have fallen by £1bn, or 53 per cent, during the decade from 2008/09. The St Mungo’s research found that early intervention services, such as family mediation and tenancy sustainment work, had suffered particularly due to the removal of the ring-fenced central government grant. The Homelessness Reduction Act was intended to encourage and facilitate more preventative work by local authorities. This is to be applauded, but it cannot replace the infrastructure that has been lost over the past decade due to a lack of investment.

Despite the changes under the Homelessness Reduction Act, without strategic investment it will remain procedural, without guaranteeing successful outcomes. One of our commissioners said “if we don’t have the tools to get better outcomes at the end of the process then what’s the point? We can extend the process, build in more reports, evaluate and monitor it all well, but if we don’t have the housing stock, or the support services to make actual changes then so what?”

The intention of the HRA was to instigate a cultural shift towards prevention among homelessness teams. Funding constraints make this particularly challenging. When the HRA was implemented in April 2018 it was accompanied by £72.2m of new burdens funding. The funding was distributed among the English regions and calculated based on estimations of the increased cost in terms of duties to help secure accommodation, to provide advisory services, request a review, ensure the suitability of accommodation, provide accommodation for cases being reviewed and to provide assessments and personalised housing plans.

The funding lasts for three years and is only intended to support the increased costs of transitioning to the new duties required by the HRA. Leaving aside the short-term nature of the funding, it is clear that it is inadequate to the task of the new burdens. The estimated cost for London boroughs alone is £77m per year, and according to Centrepoint there was insufficient funding to cover new burdens, just for young people, in more than half of local authorities.

¹⁸ St Mungo’s (2019) *The government must fix £1bn hole in vital homelessness services*

The new burdens funding does not provide resources to actually carry out the new duties in a sustainable or strategic way. In most authorities, like the London Borough of Southwark, where the new burdens funding was £420,000, the temporary funding does very little to plug the gap, more than double that figure, which has opened up over the past decade. If the funding does disappear in 2020, then these authorities will have to lose yet more staff, along the attending capacity, training and knowledge. There is a desperate need for long-term sustainability across local government finance. If the government is serious about tackling homelessness and ending rough sleeping it will have to tackle this fundamental issue.

On April 23, the House of Commons housing, communities and local government select committee held an evidence session on the first year of the Homelessness Reduction Act¹⁹, which came into force in April 2018. Heather Wheeler, minister for homelessness at Ministry of Housing, Communities and Local Government, told MPs the act will be reviewed in March 2020. This will include the new burdens funding that councils received when the act came into effect.

Currently, the HRA has led to an internal review of services in many councils, however local authorities are still struggling with case management. Joe Smith from Crisis told the Commission that the most successful authorities are flexible and responsive to feedback from service users. Softer skills are being developed in many councils in order assist individuals better. It is necessary, however, to develop these skills further and more training is required for officers. One of the Commissioners said that culture change takes time and the new legislation should help this to develop, but more resources are required to fall in line with the HRA. New staff members have been recruited in many areas, especially from support work backgrounds. A culture is needed where the service user is put first, the Commission heard.

The Homelessness Reduction Act, and the funding that has been provided to support its initial implementation, has established a process around working with people when they are at risk of homelessness. But the outcomes of that process are not funded or supported by the legislation. There is a procedural requirement that a “Personal Housing Plan” be drawn up for each individual presenting to the council. But if councils cannot rely on there being something at the end of that process, whether it be secure and sustainable accommodation, or decent and intelligent services to address individual needs, then the process is largely pointless. Joe Smith told the Commission that Crisis expected the casework and administrative load to decrease as the cultural change becomes established. There will be a concurrent improvement in monitoring and evaluation, as well as resource requirements.

Devolution

Part of the problem is where the money is. Most of the public funding that covers housing and homelessness issues, which amounts to roughly £1.2bn, is administered by the Department for Work and Pensions in the form of housing benefit payments. An increasing amount of this money goes straight to landlords in the private rented sector. It is money that could be spent far more effectively if it was part of a coherent and joined-up housing and homelessness strategy.

In terms of value for money it is particularly poor and inefficient that such a large amount of public spending goes through the private rented sector in the form of benefit payments. A far more sensible, strategic and sustainable approach would be to provide proper investment in the UK’s housing stock across the board and to properly fund councils to do joined-up, strategic work. As it stands, councils are able to borrow small amounts for individual projects. They are also able to bid for small, delimited pots of money for centrally governed pilots and

¹⁹ Housing, Communities and Local Government Select Committee (2019) Homelessness Reduction Act: One Year On Inquiry

projects. This frustrates the attempts by councils to join up and to coordinate strategies to prevent homelessness.

The case study from Ireland, included in this report, shows that alternative approaches are available. In 2018 the Irish Minister for Housing and Local Government announced an increase of 46 per cent in funding for housing, to €1.9bn²⁰. This includes money for building new social rent houses, as well as increased support to expand the Housing Assistance Payment and Rental Accommodation schemes that help to keep people living independently in social or private sector tenancies. The relative amount that is spent in the UK pales in comparison, and the resulting difference in outcomes is striking,

One of the most dysfunctional aspects of the system of finance surrounding housing and homelessness is in the welfare regime. There is not enough money in the right places to fund local rents and housing support for vulnerable people, leading to more evictions, higher rates of homelessness and greater difficulty finding stable accommodation. Local Housing Allowance, the maximum amount that a household can claim in housing benefit in the private rented sector, is being rolled into Universal Credit and has faced a series of drastic cuts since 2011. This continued underinvestment in the housing welfare regime is an important factor in driving homelessness across the country, particularly alongside the growth in the private rented sector.²¹

In response to the LGiU Local Government Finance Survey almost two thirds (61 per cent) of councils said that the lack of variation in the Local Housing Allowance is causing problems in their local housing market. The type of issues vary across different authorities, from making it harder to tackle homelessness (45 per cent) and artificially inflating local rental prices (25 per cent), to encouraging rogue landlords (10 per cent) and causing a decline in the quality of local housing stock (10 per cent).

There is only piecemeal funding for homelessness services provided from central to local government. One of our Commissioners pointed out that funding needs to increase otherwise services cannot be properly provided, and that in Wales the LHA is more equal to rent payments.

The Localism Act (2011) gave councils the power to carry out their homelessness duties using accommodation in the PRS. The government says it spends £22bn a year on housing benefit.²² This is an inefficient transfer of funds to landlords, which does not achieve any of the goals around preventing homelessness, supporting vulnerable people or ensuring access to good quality housing. A recent Shelter report showed that taxpayers are inadvertently funding the private rented sector as the money from LHA and Universal Credit is used to pay private landlords. According to the National Audit Office the gap between LHA rates and actual rents is increasing and now some two thirds of households covered by LHA are faced with such a gap.²³ According to Crisis, there is a gap between LHA rates and rent for 98 per cent of working age households with children. More and more of these people rely on private rented housing and the Crisis research shows that the disparity is having a large impact on the levels of homelessness from within the sector. LHA recipients more likely to have tenancies ended by landlords, and not to have them renewed

A recent Policy Evaluation and Research Unit report²⁴ shows that there is a gap between LHA rates and rent for 90 per cent of working age households with children in receipt of the

20 [Rebuilding Ireland \(2019\) Minister Murphy Announces Housing Budget](#)

21 National Audit Office (2017) Report by the Comptroller and Auditor General: Homelessness. London: National Audit Office

22 [Institute for Fiscal Studies \(2019\) Doubling of the housing benefit bill is a sign of something deeply wrong](#)

23 National Audit Office (2017) Report by the Comptroller and Auditor General: Homelessness. London: National Audit Office

24 [Manchester Metropolitan University's Policy Evaluation and Research Unit \(2018\) Homelessness from the PRS](#)

payment. Across much of the country the gap is increasing, so that two thirds of households in receipt of LHA experience difficulties.²⁵ LHA support, which covered 50 per cent of local rents in 2011, was quickly reduced during the period of welfare reform to cover just less than the cheapest 30 per cent. Further reductions were followed by a freeze to the benefit from 2016-2020. A recent Crisis report finds that in almost all areas of Great Britain, only a fifth, often less, of PRS accommodation is affordable within LHA rates.²⁶

Crisis found that of those in receipt of LHA, just around a fifth reported that benefit rates fully covered their rents. While 10 per cent of all private renters were in rent arrears, those in receipt of LHA were more likely to be in arrears compared to those renting without benefits. This also has an impact on the number of households that become homeless from the PRS. There is a two-pronged effect in which LHA recipients are more likely to have their tenancies ended by landlords, as well as not to have them renewed. They are also find it more difficult to access secure, sustainable accommodation as LHA recipients.

Yet this masks the variation between local areas and regions. In London and the South East, where the problem of affordability is particularly acute, the gap is large and growing. But in other areas where there is low demand for housing, such as Blackpool and other similar urban areas, LHA rates can distort the local market. The Broad Rental Market Area, used to calculate local benefit levels, often covers a wider suburban and rural area, where rents may be higher than small urban centres. In both cases, a lack of variation and local control over housing benefit means that public money is being used to subsidise landlords in a dysfunctional housing market.

25 National Audit Office (2017) Report by the Comptroller and Auditor General: Homelessness. London: National Audit Office

26 Basran, J. (2019) Cover the Cost: How gaps in Local Housing Allowance are impacting homelessness. London: Crisis.

7. Conclusion and recommendations

Homelessness is a much bigger problem than rough sleeping. This needs to be acknowledged in national policy and strategy, which means changing the narrative. Too often politicians want to address the problem they can see and so they talk about rough sleeping without addressing the wider and deeper issues.

The homelessness crisis has been exacerbated by central government failure, both in terms of poor policy choices where it has acted and by neglect where it hasn't. Local government is responsible for picking up the pieces. But depleting resources and a lack of powers to intervene in the housing market means that councils will be increasingly frustrated in their efforts to prevent homelessness.

It is not a small, isolated area of public policy. As Crisis have argued²⁷ there needs to be a combined strategy that tackles both homelessness and housing with a cross-departmental programme. Councils have to step up as a part of this network, and we should acknowledge that local government as a whole must improve in relation to preventing homelessness. The Homelessness Reduction Act has brought welcome improvements to the process, but it does not amount to prevention. It addresses the issue at one point in the chain, when the risk of homelessness is already acute. It has changed the way councils think about the support they provide to people at risk of homelessness, which should be applauded, and there are some very positive and encouraging examples of councils drawing together different parts of the public sector to coordinate this work.

But it goes both ways and we have to acknowledge that this work is resource intensive. The finance that central government provides to councils is piecemeal, inadequate and does not provide a sustainable or certain source of funding for strategic planning in local government. Instead councils have to bid for small pots of money, tap in to limited and depleted pools of resource in other departments and generally work on a shoestring. But we cannot expect transformative change on a shoestring.

We support work done by Shelter and others which says that government can and should borrow to fund more building and a decent housing strategy. But we need to go further. Without significant strategic funding, therefore, the systems in place under the HRA will remain procedural. They will result in an improved assessment process, but with no ultimate outcomes because there is not the sustainable and affordable housing, mental health support, addiction services, or other infrastructure that will actually address the causes of homelessness.

Tackling homelessness and addressing its causes is a long-term project that needs to draw on partners and organisations from across the public sector. It will take more than one piece of legislation to solve. The Local Government Homelessness Commission therefore makes the following recommendations.

²⁷ Crisis (2018) Preventing homelessness: It's everybody's business

Recommendations

1. A sustainable housing and homelessness strategy, with adequate funding.

Homelessness is a much bigger issue than rough sleeping. For every two people sleeping rough on the streets, there are 98 in shelters, temporary accommodation, bed and breakfasts, or moving between precarious forms of accommodation.

The narrative must change so that it encompasses all forms of homelessness. We need an approach that addresses the real, underlying issues, because just trying to tackle the problem we can see will not work.

Councils have been tasked with solving one of the big social and political challenges that we face, but with inadequate resources to take on the task. Funding for homelessness services is piecemeal, unproductive and fragmented. As a result there are various small pots of money that help to fund pockets of innovative practice. The HRA has had a positive impact on culture and on the processes within local authorities. But councils need certainty. Without funding to instigate real change in the outcomes, the HRA will only have created an 'assessment process', without achieving any of its stated aims.

Therefore, as a matter of urgency, the government should commit itself to a coherent, combined housing and homelessness strategy with sustainable funding for local authorities to put preventative programmes in place. This must include a firm commitment beyond the 2020 deadline for new burdens funding.

2. Local variation of housing allowance

We are spending a lot of public money on homelessness, but it is largely wasted because it is being spent inefficiently and in the wrong places. Local Housing Allowance, in particular, amounts to a costly and inefficient transfer of public funds to private landlords and fails to achieve the goals of reducing or preventing homelessness.

In many parts of the country LHA rates are well below local market rents, while in some areas the rental market is distorted by how rates are calculated, bringing high and low demand areas together within the same bracket. This means that tenancies are unsustainable, conditions are too often poor, and councils cannot access decent accommodation to house people when they are at risk of homelessness.

Local government should, therefore, have the power to vary Local Housing Allowance rates to better reflect local housing market conditions. Greater variation would be a far more efficient use of public money. It would enable more people to carry on living independently, as well as facilitating councils carrying out their homelessness duty in the private rented sector. In Ireland the government has transferred LHA to housing departments and away from welfare departments. Along with a large programme of investment in affordable housing supply, this represents a coherent strategic approach to housing and homelessness policy.

3. Private rented sector

The private rented sector is a rapidly growing part of the housing market and the breakdown of a PRS tenancy is now the most common route into homelessness. Meanwhile, recent policy changes have weakened the position of small-scale private landlords, who are a vital part of the housing market across the country. Something is not working, therefore, and the consequences are terrible for some people. This demands attention.

To address instability and uncertainty in the private rented sector, the government should introduce minimum three year tenancies. In return, the importance of good landlords should be acknowledged and they should be supported to stay in the market. This would provide greater long-term security and stability for people renting private sector housing.

The Residential Landlords Association has argued²⁸ that landlords are not generally opposed to longer tenancies, but would like to see them combined with financial incentives and the ability to take possession of their properties in certain circumstances.

There have been some encouraging signs. In April 2019 the government announced plans to end Section 21, so called “no fault evictions”, whereby a landlord can end a tenancy without giving a reason. This is a welcome development, but it remains only an intention at this stage. As yet there is no legislation proposed to make it a reality. In any case, insecurity will remain an aspect of private renting for many, particularly vulnerable people and families on low incomes.

In 2018 the government announced that it was considering introducing three year tenancies as a standard minimum for private sector renting.²⁹ However this proposal was withdrawn in the Autumn, citing the potential risks to investment in the sector. Some private developers, with large investments in rental properties said they were surprised by the government’s decision and argued that a mandatory minimum of three year tenancies would not be a burden.³⁰ The Residential Landlords Association said that there was significant demand among private tenants for an increase in the minimum length tenancy.³¹ Meanwhile, the Treasury and the Prime Minister, Theresa May, said that longer tenancies should be voluntary rather than mandatory.

4. A homelessness prevention toolkit, designed around the needs of local government.

All too often people fall through the cracks between public services that are poorly joined up. Councils are responsible for bridging these gaps, but they need the tools to do so and accurate, useable information is essential. The current system of gathering and sharing information does not work, however. It is inconsistent, out of date, and often inaccessible.

To build a homelessness prevention toolkit for councils, the government should invest in a project to identify what information local government needs, particularly from central government departments, where the information is held, and what would make it most useful for preventing homelessness. The project should be led by councils and based on the experience of council staff and service users.

28 <https://research.rla.org.uk/report/longer-term-tenancies-in-the-private-rented-sector/>

29 [http://www.cih.org/news-article/display/vpathDCR/templatedata/cih/news-article/data/Longer tenancies in the PRS would be excellent news for many](http://www.cih.org/news-article/display/vpathDCR/templatedata/cih/news-article/data/Longer+tenancies+in+the+PRS+would+be+excellent+news+for+many)

30 <https://www.propertyweek.com/news/government-scraps-three-year-tenancy-plan/5098553.article>

31 <https://landlords.org.uk/news-campaigns/news/longer-term-tenancies-nla-reacts-three-year-proposals>

Case studies

Case Study: Hackney

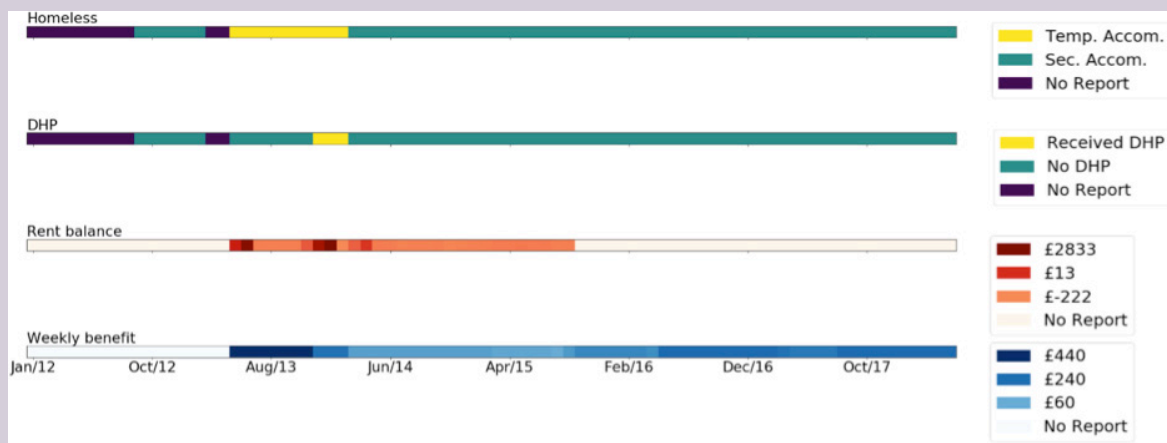
Hackney Council is taking steps to make best use of its data in order to prevent homelessness amongst the most vulnerable in the community. Data driven decision making is an evolving approach across the organisation but is being driven thanks to supportive management, subject matter experts in our Housing Needs service and a skilled in-house data team. A pre-requisite of using data more innovatively to understand changing demand is getting the basics right first. This means collecting good data, making sure it's clean and of high quality and finding ways to use qualitative alongside quantitative information. Reduction in government funding for councils presents serious problems for Hackney residents, exacerbated by vastly increasing house prices which have risen by 82 per cent in the last five years, with average rent levels being at around £1,800 a month for a two bedroom flat.

The council are also concerned about the ethical implications of using data, which remains a public worry, which requires that councils be as transparent as possible. Hackney ICT is particularly keen to demonstrate to the public the value of predictive and preventative work and put information at the heart of our strategic and operational decision making. Making our data work harder for us has become even more vital due to the increased number of people presenting as homeless. In 2017/18 the council spent £7.2m placing people into temporary accommodation, with placements rising by 14 per cent. Conversely, the amount of funding available from the government has shrunk considerably, from £310m to £170m since 2010. We're trialling new approaches to learn from the data we hold across multiple services and systems.

In summer 2018, the Council carried out a data discovery to better understand the characteristics of the residents we house in Temporary Accommodation to identify any opportunities to identify people at risk of homelessness at an earlier point and to identify whether we had other touch points through delivering services to these residents, which we could use to support people to prevent them becoming homeless. This meant building a holistic view of a household across multiple data points and systems, for example those falling into rent arrears or Council Tax arrears or requiring increasing support from adult social care.

The analysis and conversations with our subject matter experts working on the front line in Housing Needs, showed us that around to 60 per cent of households are in temporary accommodation when they make their first HB claim (after excluding those who were homeless at the start of the dataset). This means that many people are unknown to the Council through Housing Benefit provision ahead of becoming homeless and that, combined with the lack of data points (relatively few of our c 300,000 residents ever become homeless) makes it very difficult to develop a predictive model.

However, the data work identify opportunities to better join up the view of a households for front line workers and Hackney are exploring where there might be opportunities to give social workers a better understanding of the circumstances of vulnerable households to offer the best support they can.



Protype for how Hackney Council might provide a more holistic view of joined up data of households

Local authorities have always held a lot of disparate data about people and consequently it is necessary to make the public aware of this. We also need to demonstrate the reasons behind collecting and using this data in order to try to help make vulnerable peoples' lives better. This should help to mitigate fears and to build a more constructive dialogue.

Case Study: Bristol

Bristol City Council received Trailblazer funding from the government, which they have used to analyse data and determine those who were most at risk of becoming homeless, by looking at key trigger points. The council's work addresses a major challenge, in trying to join up data from different sources in order to have a comprehensive picture of an individual or family's situation, and therefore identify and support the most vulnerable before they become homeless. Data collected is around key trigger points including adverse childhood experiences (ACEs), history of local authority care, previous homelessness, domestic abuse, drug and/or alcohol problems along with the financial data.

Live data is fed in from the following council sources:

- Revenues and benefits (Housing Benefit data)
- Housing and rent management services
- The council's choice based lettings system
- Housing Options' homelessness case management system
- Children and families services
- Adult care services
- Substance misuse team

The data received is then analysed by predictive modelling software against known homelessness triggers and a number of points is allocated to the individuals. Those households with the highest number of points are prioritised. Due to GDPR regulations, only the financial trigger points are visible to the Advice + team who then carry out calls to those being deemed priority cases to ask if they would like assistance from the council, in order to prevent them from becoming homeless.

This is always couched in financial terms e.g. welfare benefits status, rent arrears, LHA eligibility being far lower than monthly rent etc. Caseworkers see very little personal information; only contact details, housing benefit reference numbers and dates of birth are shown, alongside known financial risks. Workers engage initially on financial triggers, but if households choose to disclose other information, they may advise and signpost or refer to services accordingly, with consent.

The Advice + programme had considerable success, with 293 households being prevented from becoming homeless and the total income of these households increasing by £1,666,220.37. However, discussions in the council have recommended that data sharing is paused until DWP and/or solicitors confirm that there are clear legal gateways to share this financial information. There has not been any guidance from DWP as yet. Without access to the data, and despite the demonstrable positive impact it has had on homelessness prevention, the project has been frozen. This case study demonstrates both the potential for data toolkits in homelessness prevention, as well as the desperate need for a coordinated and intelligent discussion around public use of data more generally.

Case Study: Southwark

Southwark Council informed the Commission of the work they are doing to reduce homelessness within the borough. Their Housing Solutions service has the third highest number of homelessness applications in the country, with 26,000 people accessing the service in the past 12 months, a 20 per cent increase on the previous year. They were the only council to implement the HRA with trailblazer funding between April 2016 – October 2018, and are now embedding this work.

The council has had a considerable amount of success, with homelessness prevention increasing by 50% as a result of their HRA trailblazer. As part of this Shelter and Solace Women's Aid provide independent advice and advocacy services within the Housing Solutions service office five days a week for all households approaching the service. The council has also employed 15 officers with former experience of being homeless within the service to help drive a new culture where prevention is the consistent priority.

In Southwark, rent prices are very high when compared to the LHA cap for London making private rented accommodation unaffordable for many households. This is made worse with the rollout of Universal Credit having already taken place.

Size of accommodation	LHA cap - April 2018 (pcm)	Average lower quartile rent (pcm)	Average median rent (pcm)
Room (in shared accommodation)	£425	£646	£719
1 bed	£911	£1,340	£1,538
2 bed	£1,184	£1,675	£1,950
3 bed	£1,433	£1,998	£2,449

LHA cap for April 2018 versus average rent in Southwark

Research by Southwark has also demonstrated that the end of an Assured Shorthold Tenancy makes up the largest proportion of reasons for home loss, which is then followed by friends and family being unable to provide accommodation and a relationship breakdown.

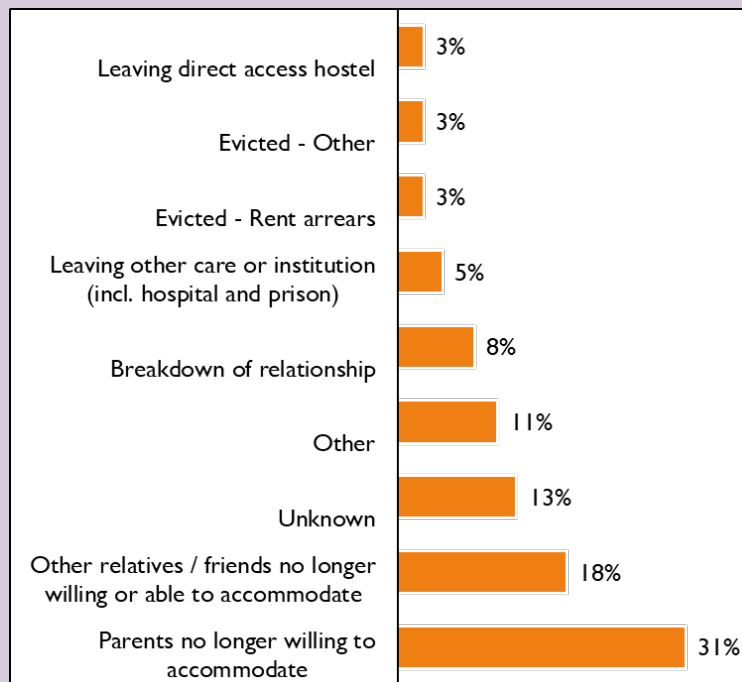
Domestic abuse is also a key trigger point in Southwark, as it is the third largest driver of homelessness in the borough. Consequently the council have adopted a new strategy treating all people fleeing domestic violence as if they are in priority need and ensuring that victims fleeing abuse do not have to return to the house they had to leave. All Housing Solutions officers also receive best practice training on domestic abuse from Solace Women's Aid. Moreover £79,000 of the budget is used to specifically help women sleeping on the street, who make up 11% of rough sleepers in Southwark. As a result of this work Southwark have received Domestic Abuse Housing Alliance accreditation.

Southwark have also ended the use of bed and breakfast for temporary accommodation. All of this work combined has led to 91% of customers now being satisfied with the Housing Solutions service offered. They now aim to eliminate the use of Nightly Paid temporary accommodation by the 1st January 2021 and to eliminate rough sleeping by the 1st January 2023.

Case Study: Social Finance

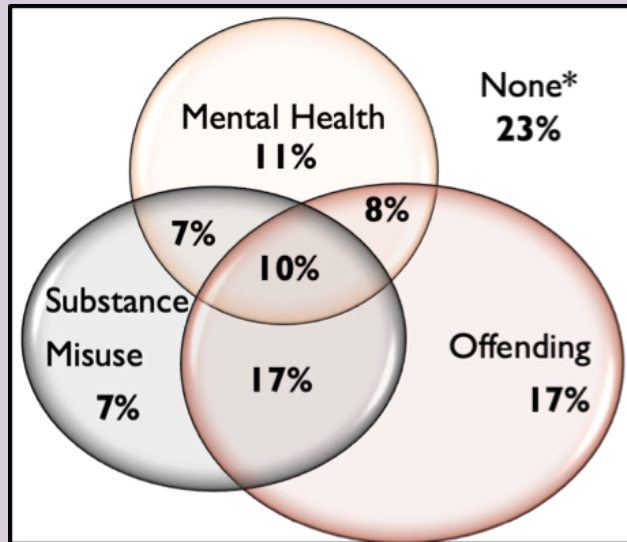
The Ministry for Housing Communities and Local Government set up the Fair Chance fund in 2014 to help young homeless people aged between 18-24 to get back into and sustain housing, work and education. The fund awarded seven contracts worth a combined total of £15 million to help these young people to charities and local organisations across the UK. Social Finance managed two of these data rich projects know as Social Impact Bonds.

The young people, Not in Education, Employment or Training, that took part in the programme often had complex needs but had been deemed to be low priority by local authorities in terms of housing provision. What's more, the housing crisis and rollout of Universal Credit has made it more difficult to access social housing, meaning that it becomes more difficult to access jobs and education, which leads to them falling through the cracks.



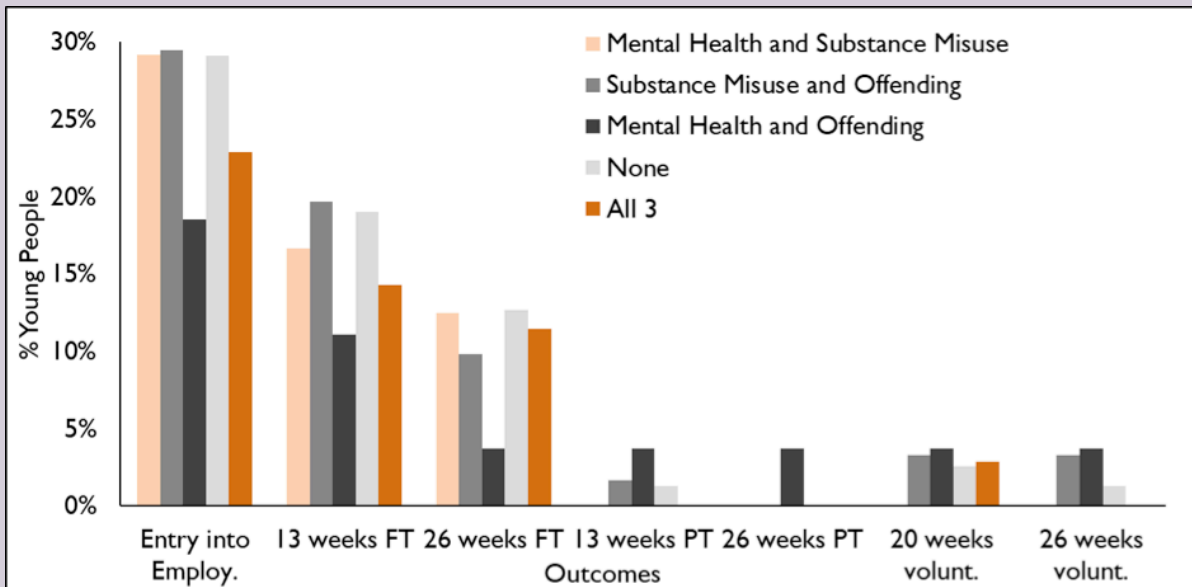
Primary reason for referral

The programme ran for three years, however the cohort was more complex than initially anticipated, with 52% having a police record, 42% suffering from substance misuse, 36% holding a mental health diagnosis and 15% being care leavers. Only 23% did not have needs which fell into these categories.



Overlapping complex needs

As a result, the programme had to be altered once it had already started in order to accommodate for these needs, the initial three month intensive engagement period was extended, providing more support for longer, and having a pot of money for ad-hoc support such as travel and CBT which allowed service-users to keep their jobs or continue with their education. Approximately 19 - 30 per cent of the cohort achieved entry into employment depending on their needs, however those who were able to sustain this to 13 weeks dropped to between 10 - 20 per cent.



Outcomes by need

The final evaluation of the Fair Chance Fund concluded that the housing led approach and multi-year funding was successful and should be replicated in future initiatives; that the outcomes achieved for young people “exceeded the expectations of MHCLG, particularly in terms of sustained accommodation and employment”; and, “for five of the eight case study subjects, the estimated cost savings and social value in the final year alone had exceeded the total cost of the intervention”.

Case Study: Gloucester

The City of Gloucester has long been a hotspot for homelessness and there is a large population of families and single people who are homeless who do not meet the criteria for supported housing. In order to support this client group the local authority makes use of interim and temporary accommodation to meet their needs that includes hotels, B&Bs and homeless hostels. Due to the large amount of households at times the local authority is faced with using B&Bs, hotels and also housing outside of the county.

The use of B&Bs and hotels is a very expensive option for Gloucester City Council (GCC) and is also hard for the individuals and families involved as they are removed from their support network for long periods of time. This can lead to disruption of schooling, decline in mental wellbeing and family breakdowns.

In 2013 Gloucester City Homes (GCH) managed Caridas House a 14 unit 37 bed space property used to house either single people or families and identified an unused building named Priory Place to provide a further five bed spaces.

This property had been empty long-term and was complex to refurbish as the building was Grade 2 listed in a Conservation area. GCH in partnership with the Local Authority undertook this refurbishment and funded this through an initial sum allocated of commuted Section 106 funding and all other costs were met by the Housing Association. Once completed this resulted in a five room accommodation providing interim accommodation for up to three months for ex-offenders who are now homeless.

During this same period GCH purchased a property from the County Council that had also been empty long-term and set about converting this resulting in a further nine room interim homeless accommodation being created for direct allocation by the local authority.

In addition to the two additional hostels GCH also committed to increasing the number of dispersed homeless properties from 12 to 34. These are a range of one, two and three bedroom houses and flats that are self-contained units to help service users move on from the temporary accommodation. Service users stay in these units between one week to two years; however the average length of use is 61 days.

As part of the Housing Association's service offer there is a Support Service for all service users. An outcomes-based tool called Outcome Star is used to measure whether individuals are reaching their targets to move away from homelessness. Their journey is measured from when they are first placed into temporary accommodation which allows the Homeless Services Team to support individuals in a more specific way. While in the hostels and units, users receive training and assistance with health matters, managing finances, maximising income and finding more secure accommodation.

As a result of this service, 124 families or individuals have moved through the Homeless Support Service with over a 90 per cent occupancy rate being achieved each year, and 815 households being provided with quality interim accommodation. This year GCH has:

- Achieved over 94 per cent occupancy across all homeless properties.
- Delivered an average room turnaround time of less than 36 hours.
- Provided safe and secure accommodation for 43 families and 55 single people.
- Supported 89 households this year, including assistance with bidding on Gloucestershire Homeseeker, money management and setting up their new homes.
- In co-operation with the City Council, have successfully set up an extra six dispersed properties to be used on a temporary basis with four more properties in the pipeline.

The programme is funded entirely through rent and service charges from the Housing Benefit, and receive no additional grants from the government. The programme is an effective way to house people temporarily and assist them with securing accommodation, despite the council's shoestring budget of £353,840

Case Study: Republic of Ireland

Over 10,000 adults and children are living in emergency homeless accommodation in the Republic of Ireland. At the root of Ireland's homelessness crisis is a housing supply crisis. Following the economic crash of 2008, private house-building collapsed and public investment in social housing fell by almost 90%, leading to a scarcity of affordable housing and rising homelessness. High rents and evictions from the private rented sector are the leading causes of family homelessness, while single homelessness is attributable to traditional factors including a history of care, hospital or prison discharge, mental health and addiction issues.

Rebuilding Ireland (2016) is the Irish Government's housing and homelessness policy framework. It has five pillars of action:

1. Address homelessness
2. Accelerate social housing
3. Build more [private] homes
4. Improve the rental sector and
5. Use existing stock.

The response to homelessness is regional. Ireland has 31 local authorities, grouped into nine regions, which are tasked with devising and delivering Homeless Action Plans. In Dublin, which accounts for 70 per cent of homelessness nationally, the region spans four authorities and is coordinated by the Dublin Region Homeless Executive.

Funding towards homeless service provision is provided to local authorities by the Department of Housing, with health supports funded by the Health Service Executive. Social housing is provided by local authorities and Approved Housing Bodies (i.e. housing associations) which have a combined stock of 172,000 housing units. Housing supports in the private rented sector are delivered under various schemes, including the Rent Supplement Scheme, Rental Accommodation Scheme, leasing and the Housing Assistance Payment (HAP).

The role of prevention is critical. The HAP is particularly effective as it allows local authorities to make a direct payment to the private landlords. HAP rates are set, however each case is dealt with individually and payments may be increased (by 20-50 per cent depending on circumstances) at the discretion of the local authority. In Dublin, 50 per cent of family homeless presentations were prevented using the HAP in 2018.

Regulation of the private rented sector has improved, with security of tenure increased from four to six years, while notice of termination of at least 28 days and up to 224 days must be provided by landlords, depending on the length of time that the tenant has lived in the property. Rent Pressure Zones have been introduced in areas of high rental inflation to prevent rents increasing by more than four per cent per annum.

A national Housing First plan has aided the integration of health and housing supports for rough sleepers and long-term homeless people. Over 270 individuals with complex mental health and addiction needs have been provided with permanent housing and wraparound supports, with 87 per cent successfully retaining their tenancies. The Housing First plan aims to increase this number to 1,000 people by 2021.

Case Study: Liverpool City Region

Liverpool Housing First pilot was implemented after MHCLG announced a budget of £28m for Greater Manchester, West Midlands and Liverpool City Region. Liverpool City Region (LCR) was allocated £7.7m for three years. The idea of housing first revolves around finding long-term accommodation for people first which is then supplemented by flexible support for other needs.

The seven principles are:

1. People have a right to a home
2. Flexible support is provided for as long as it is needed
3. Housing and support are separated
4. Individuals have choice and control
5. An active engagement approach is used
6. The service is based on people's strengths, goals and aspirations
7. A harm reduction approach is used

Rough sleeping levels have gradually risen in LCR from 14 counted in November 2010 to 65 in November 2017. At the last count in 2018 there was a slight drop to 61. However, this does not account for all homelessness within the region, with 8,848 assessments by Mainstay³¹, a property management company, between 2015-17. The Housing First approach is holistic, with mental health support, learning and work coaching, on-call service and access to accommodation.

Case Study: Scotland

The Scottish government has taken a more active and strategic position. In 1028 Holyrood published “Ending Homelessness Together: High Level Action Plan”, aimed at tackling homelessness and rough sleeping. Crucially, local government is at the heart of the strategy as part of the Homelessness Prevention and Strategy Group. The group is chaired by the Minister for Local Government, Housing and Planning, as well as the COSLA Spokesperson for Community Wellbeing.

Under the Housing (Scotland) Act 1987 a person should be treated as homeless even if they have accommodation, because their accommodation must be suitable and long term.

Following the Programme for Government 2017-18 , the Scottish government renewed its commitment to tackle homelessness, end rough sleeping and transform temporary accommodation. This included a pledge of £50m to support homelessness prevention over the following five year, as well as an Action Plan for cross government prevention work.

The Action Plan pledges to build up local authorities’ capacity to understand the circumstances that have led someone to become homeless, as well as the role of frontline workers. This includes, as recommended for England in this report, a new form of national rough sleeping data collection, enabling frontline workers to have accurate information about rough sleeping and exploring options for a system that enables real-time data sharing between agencies.

Some of the other key points from the Action Plan include:

- A Housing First approach, under which every local authority will submit a rapid rehousing transition plan (RTTP) to ensure a national shift towards rapid rehousing by default, as well as five year plans, delivered from April 2019.
- A focus on prevention that recognises the importance of transitional periods like leaving care, leaving prison or coming out of hospital.
- A new funding framework for temporary accommodation
- Developing preventative pathways for the groups at highest risk of rough sleeping and homelessness.

The Plan contains a raft of other measures, which, while they are ambitious, seek to address the wider underlying causes of homelessness. Local government has a crucial role at the centre of this strategy, backed up by funding, bringing together partners and resources across the public sector.