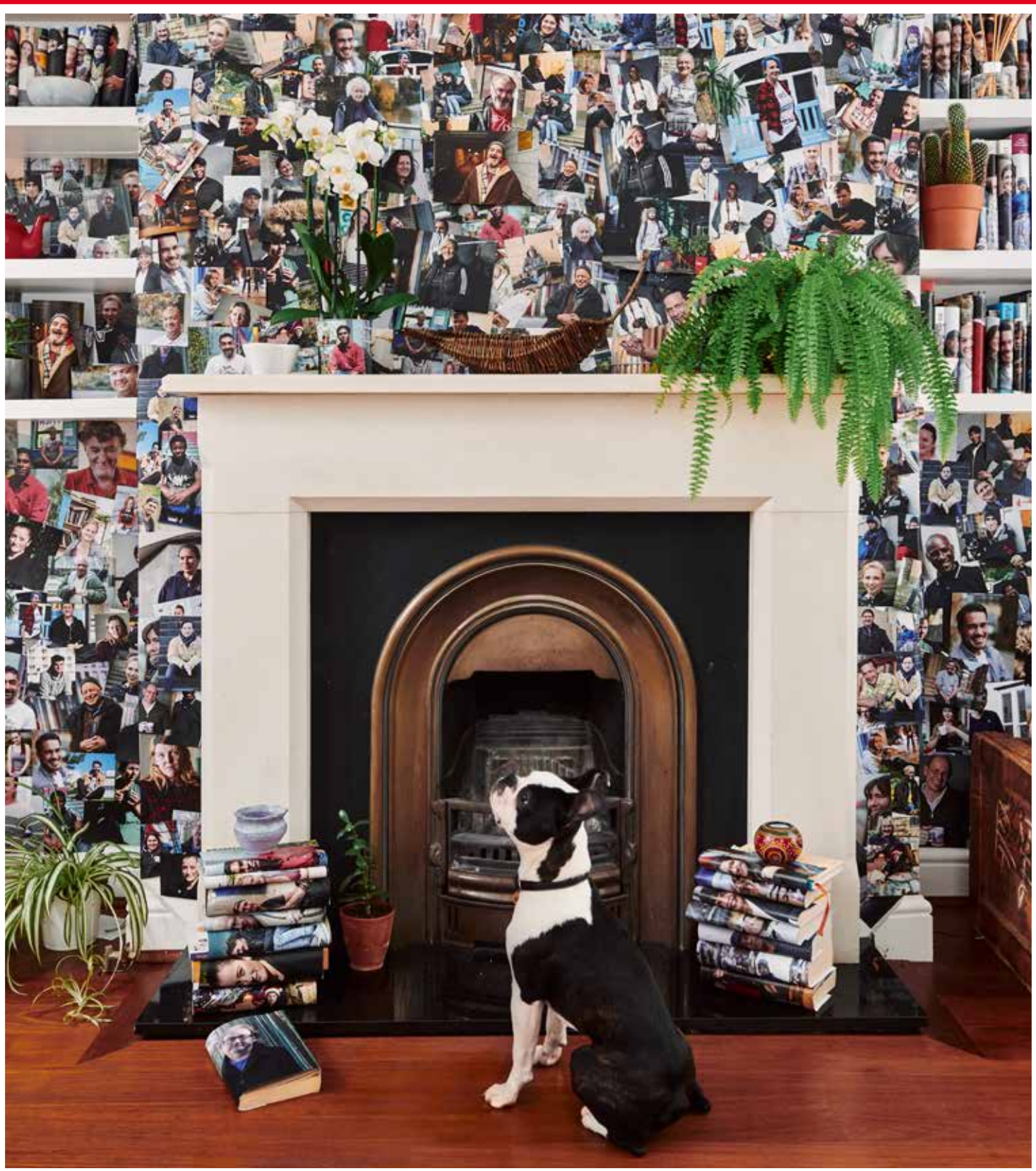
Crisis

Together we will end homelessness

EVERYBODY IN

How to end homelessness in Great Britain



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About Crisis

Crisis is the national charity for homeless people. We help people directly out of homelessness, and campaign for the social changes needed to solve it altogether. We know that together we can end homelessness.

Acknowledgements

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Countless staff at Crisis have contributed to this document and the wider project to mark our 50th anniversary with a plan to end homelessness. Thanks especially to colleagues in the following teams: Fiftieth Anniversary; Fundraising; Housing; Innovation and Enterprise; Internal Communications; Marketing and Communications; Member Involvement; New Developments; Policy and Campaigns; Research and Evaluation; Skylight Directors.

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Disclaimer: All views and any errors contained in this report are the responsibility of Crisis

Contents

Endorsements

The Most Reverend and Right Honourable Justin Welby
Archbishop of Canterbury

It is a tragedy that today almost 250,000 people in Great Britain are homeless, leaving too many women, men and children vulnerable on our streets or in inadequate accommodation. Many churches support people who are homeless, befriending them and providing a listening ear, as well as offering food, night shelters and other practical help. But there is so much more that we can, and should, all be doing as a society. This plan to end homelessness provides the evidence-based policies and practical solutions that are needed to help ensure that homelessness becomes a thing of the past, so that everyone has access to the kind of safe and stable housing that is so vital to human dignity and society's flourishing.

Dame Louise Casey
Chair, Institute of Global Homelessness

In the late 2000s we lived in a country where the numbers of human beings forced to sleep on the streets was in the hundreds. It is shocking that in the last decade we have seen that progress reversed, to the tragic situation of thousands now sleeping rough every night. This should be to our national shame.

I congratulate Crisis for seizing this important campaign and providing a solution to tackle all forms of homelessness, not only rough sleeping. Countless families are facing destitution and homelessness every minute and hour of the day.

The time is right for a new national and political effort to tackle all forms of homelessness. Action must be driven not only by government, but also by communities nationwide.

Crisis has provided us not only with the challenge to take up action, but in this plan, the solutions to make lasting change.

Nan Roman
President and CEO of the National Alliance to End Homelessness

Grounded in an understanding of how the homelessness crisis emerged, and based on data and evidence, Everybody In is an inspiring vision of how to end homelessness in the UK by focusing on housing. If any organization can lead the campaign to make this vision a reality, it is Crisis.

Juha Kaakinen
CEO, Y-Foundation, Finland

Everybody In: How to end homelessness in Great Britain is quite an extraordinary paper. You can read it as a highly ambitious report on the state of the art of homelessness policy. But it is much more: a manifesto and a roadmap to a policy that eventually could end homelessness for good. There is much to admire in this paper: a consistently participatory process of execution, systematic, comprehensive and coherent approach and argumentation but most of all an ethically justified high level of ambition in setting future policy goals. After this no one can say that they don't know what should be done to end homelessness.

In this report culminates much of the aspirations and work Crisis has done already for 50 years and it should have the same revolutionary impact as the Beveridge Report had in its own time. It is a powerful call to arms to fight together the one great evil: homelessness.

Tim Richter
President & CEO
Canadian Alliance to End Homelessness

I love the audacity and brilliance of this plan. It's a bold, thoughtful and meticulously researched document that lays out an ambitious and highly achievable plan to end homelessness in the UK. I've studied (and ripped off!) plans, programs and models for ending homelessness from all over the globe for more than a decade now, and this is one of the best – if not the best – I've seen. I fully intend to steal large parts it to advance our efforts in Canada.

Great work Crisis – put this plan to work and an end to homelessness in the UK is not only possible, it's within your reach.

Executive summary

What the plan is about

This plan outlines the evidence-based solutions that can end homelessness in Great Britain, built round the belief that everyone should have – and is ready for – a safe, stable place to live. It contains solutions for the long term, rather than to suit current political favour, building on what has worked at home and abroad to end homelessness. The plan shows the costs of preventing and solving homelessness for people, along with the policy changes needed to get us there.

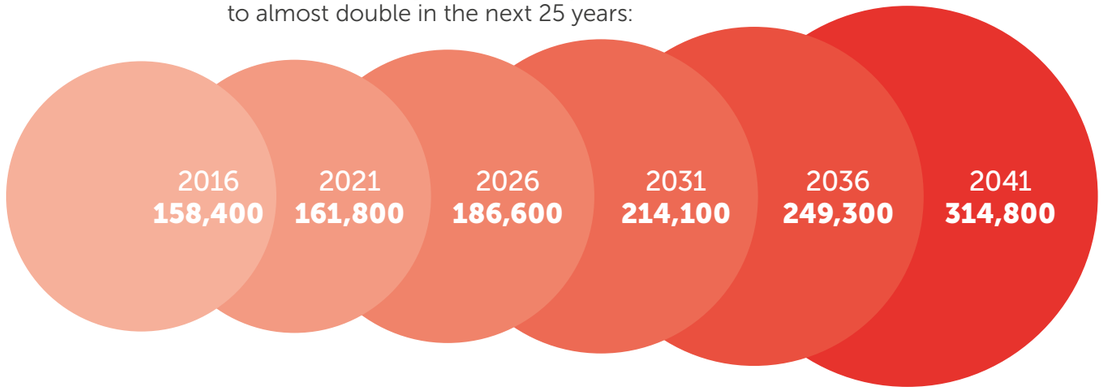
The plan is designed to help the governments of England, Scotland and Wales. It will be regularly updated and improved as we gather more information about what works to end homelessness.

How the plan was put together

The plan was developed with a wide range of homelessness experts throughout Crisis' 50th anniversary year. The three main programmes feeding into it were: a large-scale international evidence review of what works to end homelessness here and abroad; a consultation with more than 1,000 people across Britain, including people with experience of homelessness, sector policy and practice experts and government officials; and newly commissioned research from leading academics and organisations where evidence was lacking.

Why now?

There are almost 160,000 households experiencing the worst forms of homelessness in Britain. If we carry on as we currently are, this is expected to almost double in the next 25 years:



What we mean by ending homelessness

Ending homelessness doesn't mean that no-one will ever lose their home again. It means it rarely happens, and that there's a quick solution when it does. This plan shows how to ensure that:

no one sleeps rough: whether they are in tents, cars or, at worst, on the streets

everyone has a safe, stable place to live: so that nobody is in emergency accommodation like a hostel or night shelter without a plan to quickly move into housing

where we can predict homelessness, we can prevent it: so that no-one leaves their home or is forced to leave a state institution like prison with nowhere to go.

Ending rough sleeping

Rough sleeping is the most dangerous form of homelessness, yet there has never been more evidence of how to end it. We should not accept anybody sleeping on the streets.

All people experiencing homelessness should be entitled to support, whatever their background.

We need to quickly identify everyone sleeping rough and help them for as long as it takes to find and keep a home. Those who just need some short-term help, like assistance with a deposit, should be helped into secure, decent housing rather than a temporary solution. For those who need a lot of support, Housing First is a proven approach:

Housing First works for people with high and complex needs

People move into ordinary, permanent housing

They then have access to long-term, high quality support for as long as they need

The plan includes a full list of policy recommendations needed in England, Scotland and Wales to end homelessness.

Some of the solutions in this area include:

- ensuring emergency accommodation is always available for those in immediate need
- Funding for robust, personalised support for all rough sleepers, focussed on moving them into permanent accommodation
- making Housing First the default option for anyone homeless with complex needs.

Getting everyone housed

The vast majority of homeless people in Britain are in temporary accommodation like hostels and night shelters, or sleeping on people's sofa and kitchen floors. In situations when someone's homelessness cannot be prevented, there needs to be a rapid response that ensures they are supported into mainstream accommodation in ordinary communities.

While there will always be a need for some form of emergency accommodation for those in immediate need, a housing-led approach accompanied by the right support for each individual can ensure we minimise the amount of time people are homeless.

Emergency accommodation should only ever be a temporary solution – people instead need greater entitlement to a home, giving them the best chance of being healthy, having a job and feeling part of society. To do this, we'll need enough housing available that homeless people can truly afford:

We need

100,500

social homes a year

Solutions in this area include:

- time limiting the use of unsuitable temporary accommodation
- 100,500 new social homes each year for the next 15 years to meet the needs of homeless people and people on low incomes – including those at risk of homelessness
- funding of Critical Time Interventions, an evidence-based approach that helps people move quickly into their own home.

Preventing homelessness

The best way to tackle homelessness is to stop it happening in the first place. Where there are predictable routes into homelessness, like leaving the care system or prison, we should do everything we can to help people find and keep a home. Preventing homelessness is cost effective – but more importantly, it is the right thing to do.

The idea of focussing on preventing homelessness is well developed across Britain but gaps still exist that stop some people getting the help they need when they need it most. Everybody at immediate risk of homelessness must be able to access support – which means that governments need to provide enough funding for councils and other relevant organisations to step in when they need to. We also need to address the ongoing failure of state institutions to prevent people from falling into homelessness when leaving their care.

Solutions in this area include:

- a duty on local authorities in Scotland to prevent homelessness
- a wider duty on other public bodies across Great Britain to prevent homelessness
- funding for local authorities to provide a mandatory set of activities to help prevent homelessness, including family mediation and supporting people to keep their tenancies.

Wider reforms

Legislation
A strong legal system underpins all solutions to ending homelessness. While Britain already has some of the most forward-thinking homelessness legislation in the world, people still fall through gaps in the systems in England, Scotland and Wales.

Our legal system protects thousands from homelessness each year but there is more to do. We need a complete safety net of legal protection for all homeless people, based on these key principles. Every homeless person is deserving of help. They should be able to access help wherever and whenever they need it. Local authorities and other public bodies should have robust duties to prevent homelessness. And there should be clear regulatory oversight of how they discharge their duties under the legislation.

Solutions in this area include:

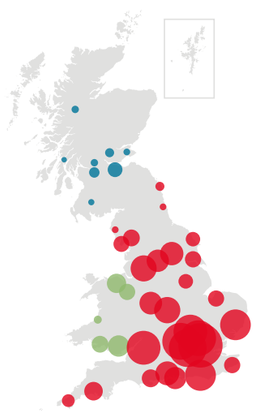
- enabling everyone to access help, including abolishing priority need in England and Wales
- ensuring that a lack of a local connection is never a barrier to support
- introducing robust regulation and monitoring of how key bodies support people facing homelessness.

Welfare and housing
Ending homelessness is only possible if we have enough housing available and people have the means to keep their homes.

We need to reduce the pressure on people's lives caused by high housing costs, insufficient benefits and a lack of available support. This means building enough homes, including social housing, for homeless people to live in, along with greater protection for those renting. It also means ensuring people are financially capable of keeping their homes. We need Housing Benefit to truly cover the cost of housing, along with ongoing support for people that need it – whether that is help finding a job and keeping on top of bills, or support to help people feel mentally and physically well.

Solutions in this area include:

- Housing Benefit that truly covers the cost of housing and reflects projected rent rises
- a new standard private rented tenancy in England and Wales with limits on annual rent increases
- specialist integrated employment and housing support for homeless people.



Housing Benefit does not cover local rents in many parts of the country – the map shows the areas with some of the biggest gaps.

Costs

We'll need money to deliver the solutions in the plan, but we'll be saving money too. PricewaterhouseCoopers LLP have estimated that the total costs of supporting homeless people in our five definitions of ending homelessness between 2018 and 2041 is **£19.3bn**...

... and will deliver benefits of **£53.9bn***

* these are in Present Value terms at 2017 prices and apply to the specific solutions costed in their model

Government action

To end homelessness, we will need each government to think strategically. They must work across all relevant government departments, at a local and national level, on a shared long-term vision of how to make it a reality.

"I met my ex-partner at 13. I moved to live with him when I was 16.

We lived with his family who used to manage and live in pubs. The landlord told us he wasn't renewing the contract and we had a week to leave.

We ended up sleeping in a car and borrowed a relative's caravan. It was only meant for two people, but there were six of us. I wanted to leave but I felt trapped.

My boyfriend's mum got a job as a cook in another pub and there was an unfurnished flat we could stay in. It didn't have anything. We slept on the floor in sleeping bags.

When I was 22, I went to stay with a cousin in London. It turned into three months. That was the first time I'd felt free for years.

I went back to Oxford... I was struggling with my mental health and I had no job. I had to sleep in my father's garage because the house was still full of lodgers...

I managed to get a room in a shared house with my sister and a friend. I know I'm still only one pay-cheque away from being evicted again.

I always thought homelessness was just rough sleeping... But it's people in unsuitable and temporary accommodation too... I had no idea I was entitled to any benefits or support. Having somewhere safe and stable to live is something everyone deserves."

Codi, Oxford

Chapter 1: Introduction

Homelessness is devastating, but it is not inevitable. As a provider of services to thousands of people every year, we know that in most cases homelessness is preventable. We also know that in every case it can be ended permanently.

In late 2016, as we started to consider how to mark our 50th Anniversary the following year, a bold proposal emerged. We wanted to put together in one place all the best evidence for how to end homelessness.

We are proud of our history and achievements over the last half a century, but we were set up as a temporary project to tackle a temporary issue. We are determined to put ourselves out of business by helping to end homelessness.

Looking back at our formation in 1967, the sense of anger and organised social action to tackle homelessness was palpable. This was particularly true of the public response to the landmark television drama *Cathy Come Home*. Politicians came together across party lines; they formed Crisis, and talked about a 'rivalry of ambition' to tackle homelessness.[1]

That same anger and passion continues today within Crisis and across our society. The time is right to respond to the issue with bold proposals for reform, and to arm politicians with detailed and thoughtful solutions.

Ending homelessness will require a different approach than simply tackling it, or attempting to reduce certain elements. It will require holistic and system-wide reforms.

1 Crisis (2017) *Not Home Yet: A History of Britain's attempts to tackle homelessness*. London: Crisis

1.1 Why write a plan to end homelessness?

Carrying on as we are is not an option

Today there are almost 160,000 households experiencing homelessness across Great Britain. This includes more than 9,000 people sleeping rough on any given night, and almost 42,000 living in emergency accommodation like hostels, refuges and night shelters. Thousands of individuals and families are also stuck in temporary accommodation for months or even years.

This is completely unacceptable. Homelessness ruins lives in many ways, affecting health and wellbeing, family relationships, and employment. For some it is a death sentence.

The prospects for the future are bleak if the current policies on housing, welfare, and homelessness continue. Our research shows that by 2041, there will be more than 310,000 homeless households.[2]

In this context, putting together a plan to end homelessness is urgently needed. We need it to reverse the grim prospects for the coming years, and to lift our aspirations to a future where everyone in Britain has somewhere to live.

Seizing the moment

The increase in homelessness in recent years has attracted political attention. There have been legal changes in Wales and England, and new strategies under consideration in Scotland and England. Politicians are rightly switched on to the issue. But will this agenda lead to the reforms we need?

Political choices can end homelessness. This plan sets out our best attempt at providing evidence for positive reform, and specific recommendations to be taken up. Previous attempts to tackle homelessness in its different forms have made a positive and lasting difference. In the past, political action backed by funding has brought down the numbers of people on the streets and the numbers enduring other forms of homelessness. We have also taken inspiration and evidence from countries around the world where significant progress has been made.

1.2 Principles

In collating the solutions to homelessness we have been led by a set of principles. These are set out below.

A response without discrimination

Rationing of scarce resources for housing, welfare and other assistance has created a set of arbitrary distinctions between those who are seen to deserve and qualify for help, and others who do not.

Two key groups have consistently lost out. These are: 'single homeless' people, traditionally not considered a priority (with the exception of Scotland since 2012); and migrant homeless people.

Our plan does not discriminate in this way. The proposed solutions and associated costs assume everybody who is homeless in Great Britain has the right to assistance.

Housing-led solutions

Finding or keeping a place to live is the obvious first step in resolving homeless. However, this is not always the response that is available or offered. Many thousands of homeless people spend lengthy periods in accommodation projects for homeless people or temporary accommodation. They can wait months or even years to move into a home of their own.

2 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.

While emergency accommodation is essential in a crisis, and keeps many people off the streets, this must be a short-term response and, if possible, is best avoided. The plan is based on the principle that everyone can and should be housed; nobody should have to qualify for it or prove they are 'housing-ready'.

This housing-led principle requires that person-specific support must be provided to help people access housing and stay in it.

The label 'the homeless' is unhelpful and detrimental. As soon as possible, people should be helped to regain a normal existence in mainstream housing.

Following the best evidence

There is a rich tradition of both state and charitable response to homelessness in Great Britain. From soup runs to legally sanctioned state support, every day and night thousands of people work to tackle homelessness.

In producing this plan, we have sought to understand which of these services and policy interventions work best.

We have sought evidence from at home and abroad, looking at academic studies and speaking to experts in the field. We have heard from people who have experienced homelessness about the services that have worked for them. This has been a rich source of evidence for our work.

We found consistent gaps in evidence in some areas like employment and in relation to services for specific groups such as young people, LGBT groups, black, Asian and ethnic minority groups, and older homeless people.

Where these gaps in evidence occured, we have looked for the best practice available. We have only made recommendations where there is sufficient evidence to back them up.

Looking beyond current policy

The current political response to homelessness is not sufficient to end the problem.

In this context, we have stuck to the principle that if certain policy solutions are valid and effective, then we should be guided by that evidence and not by current political favour.

This has allowed us the freedom to design a policy response that is far-reaching and comprehensive. It has also allowed us to stay true to the overall aim.

The drawback is that this principle makes it less likely that politicians and governments feel able to adopt this plan wholesale. For this reason it is important that we work with politicians to present the case for the whole package of solutions, and not just those most palatable today.

1.3 Where have the solutions come from?

Crisis has produced this plan, but the content is also drawn from the expertise and experience of countless people outside the organisation.

In 2017 we ran a consultation process across England, Scotland and Wales about solutions to homelessness. We heard from more than 1,000 people, many of whom had experienced homelessness. We held 85 face-to-face events on a variety of themes. We also ran an online consultation for those who could not attend events.

The focus of this exercise was to gather the policy and system changes necessary to tackle homelessness, but it also served to gather a rich source of data about how to deliver services. It has not been possible to reflect all this information in the plan, and so we have published these results in a separate document.[3]

The best academic evidence of homelessness solutions was gathered through two rapid evidence reviews. These reviews were a comprehensive process of selecting the highest quality data from at home and abroad. One focused on solutions to rough sleeping, the other cast a wider net, looking at all interventions in homelessness.

New research has been commissioned for this report, across a range of subjects. We are extremely grateful to partners across the housing and homelessness sector. They helped us gather new evidence in housing, welfare, legislation, public attitudes, and much more besides.

In each nation, a 'delivery group' of sector experts has helped guide our work and our delivery of the consultation. Their assistance has been invaluable, and we hope we have done justice to the time and effort taken by all involved.

Finally, to provide oversight and guidance for the whole plan we set up two groups: an expert by experience panel[4] and an expert advisory board.[5] The expert by experience panel was made up of people from different parts of England, Scotland and Wales who have experienced homelessness. Their perspective has informed the work and development of the plan. The expert advisory board was a uniquely qualified group, made up of politicians and advisors across Britain who themselves have achieved positive reform in tackling homelessness.

1.4 Structure of the plan

The first three chapters of the plan set out the context for the solutions that follow. First, we explore the politics of homelessness, showing how political decisions can and have made a positive impact in the past. Second, the definition of 'homelessness ended' is explained in detail. We then explain the numbers of people who are homeless, and set out the projected changes for the coming years if policies continue as they are.

Public attitudes to homelessness are explored in Chapter 4 with an analysis of why homelessness experts must do better at explaining the issue and its solutions.

The plan covers each aspect of 'homelessness ended' as defined in Chapter 3. Evidence-based solutions are presented in relation to prevention, rapid rehousing and rough sleeping.

Following these chapters, we look in detail at some specific solutions, including reforms to welfare and housing supply. Chapter 9 'The role of Housing First' looks in depth at the contribution that this evidence-based intervention can make.

3 Hughes, N. (2018) *Have your say policy consultation: Summary report.* London: Crisis.; Uscreates (2018) *The Lived experience of homelessness.* London: Crisis and Groundswell.

4 The scope of the group included informing and planning new developments at Crisis, overseeing specific projects, reviewing internal organisation activity with the potential to affect people with experience of homelessness, etc.

5 The expert advisory board was made up of Lord Best OBE, Jackie Baillie MSP, Nick Raynsford (former Labour MP and Housing Minister), Mark Prisk MP, and Tamsin Stirling (former Special Advisor in Wales).

Migrant homelessness also has a specific focus in the plan. We outline that this group will require both the general solutions applied to other homeless people, and also exceptional measures.

There is a degree of overlap between each of the policy solution chapters, given the inter-dependence of the policy areas. We have necessarily included some repetition as this allows readers to access each subject area without having to read the entire report. The costs and cost-benefits of the proposed interventions are set out in Chapter 15 'Cost of ending homelessness'.

1.5 The limitations of the plan

As comprehensive as the plan is, there are some limitations, so we state these from the outset.

A national rather than placed-based plan

The plan covers Great Britain, setting out actions for each of the national governments. It does not seek to offer detailed solutions for any one town, city or region.

We hope that the evidence-based approach we have taken is of use to local government across Great Britain. However, we are keenly aware of the need to analyse the differences in local conditions and homeless populations before producing any placed-based plan.

As set out in Appendix 2 'Crisis' contribution to ending homelessness', we will seek to produce a local plan to end homelessness with a small number of areas in the next few years.

A political strategy, not an implementation plan

We have sought to identify the policy changes necessary to end homelessness, but we have not set out exactly how these changes could or should be delivered. For example, we have clarified the necessary reforms to homelessness legislation in Chapter 13, but we have stopped short of drafting proposed legislation or suggesting parliamentary or assembly processes.

In some ways this sits uncomfortably with the stated aim to assist politicians in making bold and positive reforms. For that reason, we view the publication of this plan as the beginning rather than the end of the process. We are committed to helping craft a detailed implementation process in each of the three nations.

The limitations of addressing homelessness alone

Homelessness is not the only disadvantage or problem faced by the people who experience it. In many cases, people will be living in poverty and often their parents will have too.[6] They may have faced adverse childhood experiences, and the range of other associated problems regularly includes poor mental health, unemployment and substance dependency.

A consistent theme in the feedback for this plan has been the need for solutions to homelessness to be viewed alongside wider action to tackle these problems.

Preventing homelessness could in theory start with government strategies to tackle inter-generational poverty and unemployment. Equally important is addressing the instability and low wages of the labour market.

6 Bramley, G. and Fitzpatrick, S. (2017) 'Homelessness in the UK: Who is most at risk?' *Housing Studies*, 33 (1): 96-116

These are all valid points and it is important that governments view their efforts to end homelessness alongside broader social and economic policy. However, this plan is restricted to homelessness alone. It cannot and does not seek to prescribe solutions to broader social problems.

1.6 Conclusion

In laying out the detail of how to end homelessness, we hope to change the political agenda and public response to it. The dangers and devastation of homelessness are not disputed, but we must change our collective response to an urgent and organised effort to eradicate the problem.

The task should not be underestimated, but we know that decisive solutions are on offer.

Everyone should have a place to live. We hope that this plan can help achieve a new political consensus behind this simple but powerful aim.

"I'm determined to start a new life in Edinburgh but it's getting harder. The main thing I'm focusing on now is just surviving the bed and breakfast intact. I've been there 14 months already and I could be there for another year... The room I was moved into was a nightmare. There was blood spatter all over the walls from where people had been shooting up. I can't relax in that environment...

It would be so much better if they had a two-tier system with specialist services for those people with high complex needs and then help for people who just need a calm, safe environment. They made a big mistake when they just started throwing people in together and now it's got to be this huge problem – 660 people in bed and breakfasts in Edinburgh alone...

You've got people like me with PTSD with these profoundly unstable people. You've got people in recovery with people who are using. You've got women mixed with men. It's just not a good mix... It's like I'm just being chipped away at and it's getting more difficult to keep my spirits up...

Once my nerves have calmed down I plan to start looking for work. Have a cat. My dream is to have a fireplace, but I realise that's too much to hope for. Just be a normal functioning adult in my own safe space."

Annabelle, Edinburgh
(Not her real name)

Chapter 2: Public policy and homelessness

The choices made by politicians can both cause and resolve homelessness. And since 1977 there have been targeted and successful political attempts to reduce it. When political action is backed across different parts of government it works well; it works best when policies that can also increase homelessness are stopped.

This chapter sets out the political context for the plan, by giving details of the most successful post-war homelessness policies. It also summarises the policy choices that can hamper attempts to solve the problem.

2.1 Introduction

Homelessness is a social and political phenomenon. It exists in its different forms and geographies in a variable state depending on how its causes are tackled and whether its solutions are adopted.

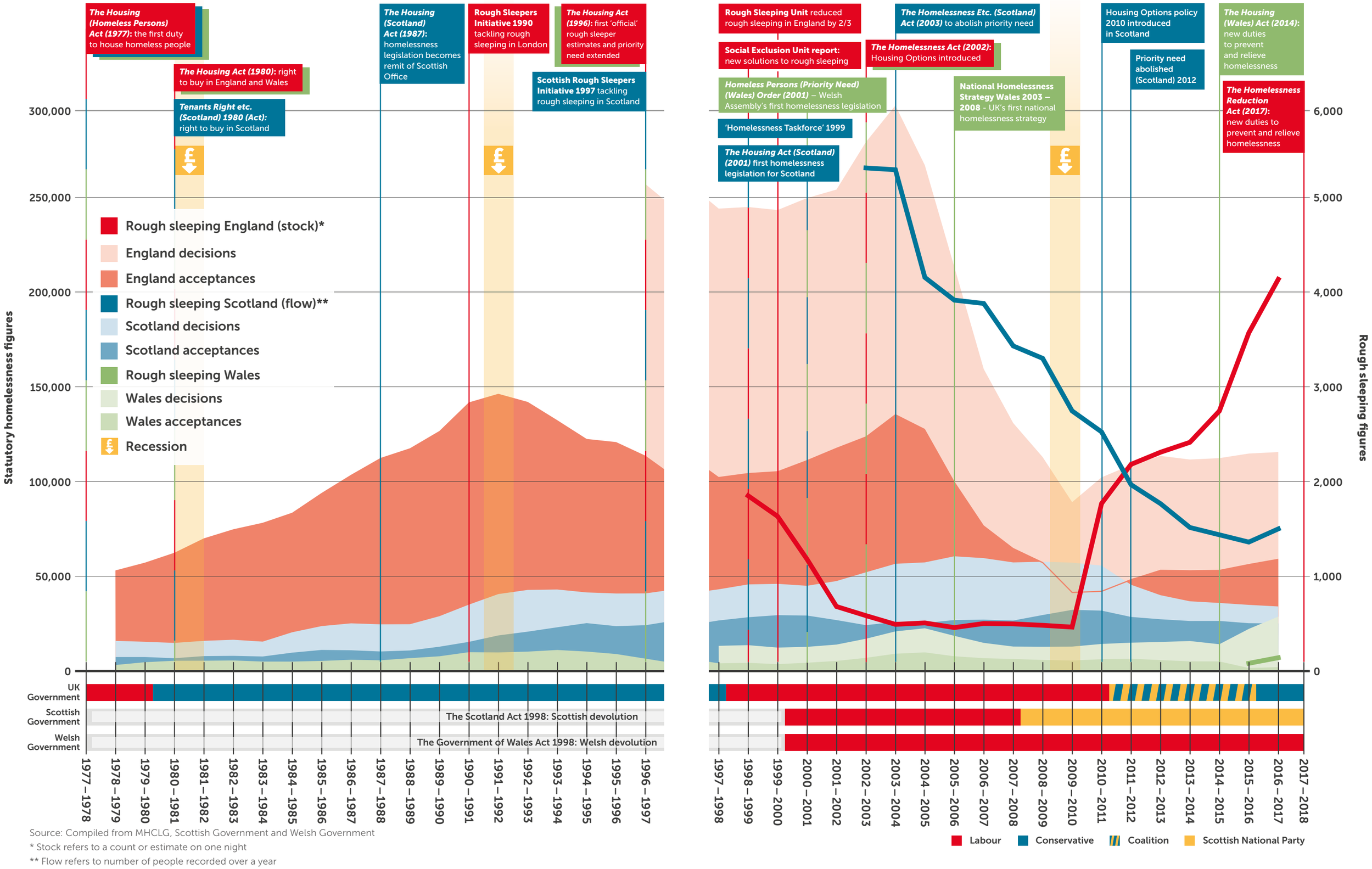
The portrayal of homelessness by experts in the field, and by the media, may emphasise the individual causal nature of personal stories.[1] But there is a wider and more important truth to the phenomenon in Great Britain: homelessness can be both caused and solved by political action.

The levels of homelessness experienced in Great Britain today have been shaped by public policy choices including housing supply and affordability; welfare spending; and eligibility for housing assistance. Intentionally or otherwise, these choices are also about whether to cause, to prevent, or to resolve homelessness.

This chapter details the major policy and political initiatives aimed at tackling homelessness, and their relative success. The longer-term structural drivers of the problem are also explored, to show relationships between homelessness and overall housing supply, employment rates, and the impact of economic cycles.

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

Figure 2.1: A history of homelessness decisions and policy changes across Great Britain

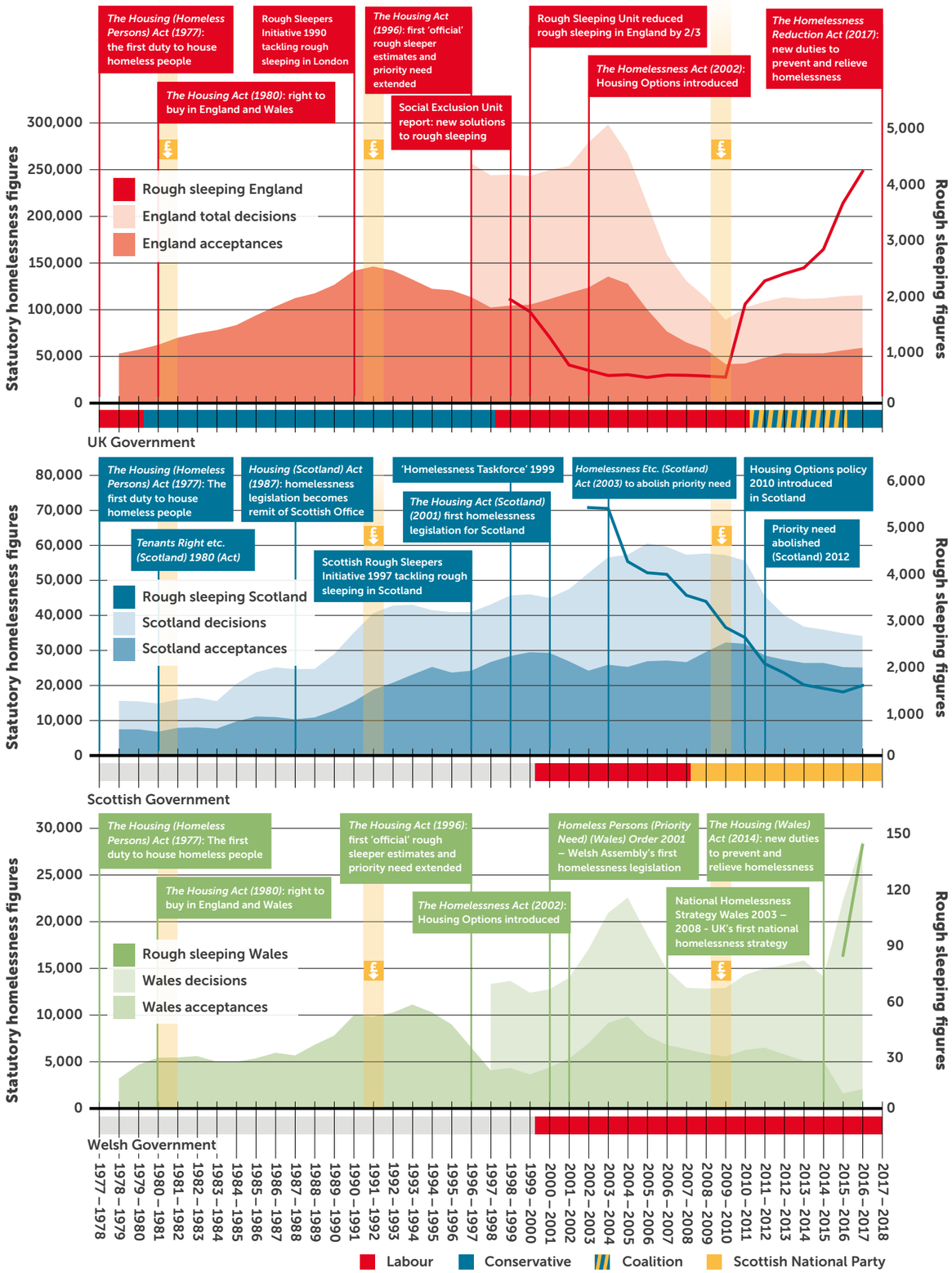


Source: Compiled from MHCLG, Scottish Government and Welsh Government

* Stock refers to a count or estimate on one night

** Flow refers to number of people recorded over a year

Figure 2.2: A history of homelessness decisions and policy changes per nation



Until 1999, homelessness policy was directed from Westminster. Since then, homelessness policy has been directed within each nation.

England

After the Great Britain-wide *Housing (Homeless Persons) Act (1977)* came into force, the number of people receiving advice and assistance from their local authority (acceptances) increased. This rise continued until 1989 and by the early 1990s homelessness had reached 146,290 acceptances.

Following the 1991 recession, acceptances in England started to fall in part due to a reduction in house prices. *The Housing Act (1996)* brought in new ways of recording total numbers of people coming forward for help (decisions) in England and Wales.

Rough sleeping had visibly risen in London and so in 1990, the Rough Sleepers Initiative was established. In 1999 the Rough Sleepers Unit was set up and achieved its target of a two third reduction in rough sleeping in England by 2001.

The Homelessness Act (2002) in England and Wales brought in new duties and preventative approaches including the introduction of Housing Options which meant more people could access advice and assistance. The increased use of prevention led homelessness acceptances figures to reach a low of 41,790 by 2009/10.

From 2010, rough sleeping and acceptances began to rise again with the impact of welfare reform, rising rents and the housing crisis. This led to the most significant change to homelessness legislation in 40 years, with the introduction of *The Homelessness Reduction Act (2017)* which brings about new duties to prevent and relieve homelessness.

Scotland

Following the introduction of *The Housing (Homeless Persons) Act (1977)*, the number of people seeking and receiving advice and assistance from their local authority rose. By 1980, the number was close to 10,000, by 1992 it had more than doubled, and by 2009 it had more than trebled.

The Housing (Scotland) Act (1987) put homelessness legislation within the remit of the Scottish Office. In 1997, the Scottish Rough Sleepers Initiative was introduced. The 'Homelessness Taskforce' followed in 1999. The recommendations of the taskforce started the development of a distinct Scottish approach.

It was not until *The Housing Act (Scotland) (2001)* that Scotland gained its first homelessness legislation. The Act introduced new duties that added to the existing legislation set out in *The Housing (Homeless Persons) Act (1977).*

The Homelessness Etc. (Scotland) Act (2003) completed the divergence from English legislation by aiming to abolishing priority need by 2012.

After reaching a peak of 32,294 in 2009/10 homelessness acceptances have gradually reduced and have since maintained a similar level.

Numbers of rough sleepers gradually reduced over time, until 2015 when numbers started to rise again. Acceptances are currently at 25,123 (in the last full statistical year).

Wales

After *The Homeless Persons Act (1977)* came into force, numbers of people accessing support, advice and assistance in Wales more than doubled between 1985 and 1993. It then fell to a low of 4,000 in 1999 before rising again to almost 10,000 in 2004.

The Homeless Persons (Priority Need) (Wales) Order (2001) was the Welsh Assembly's first piece of homelessness legislation. It introduced new priority need categories to those set out by *The Housing Act (1996).* The new categories included 16 and 17 year olds and prisoners released as homeless.

The National Homelessness Strategy Wales 2003–2008 was launched by the Welsh Assembly and was the first national homelessness strategy in Great Britain. It aimed to set a national lead for tackling homelessness at a local level.

From 2005 there was a concerted focus and investment on the prevention of homelessness and the number of acceptances fell and remained at approximately 5,000 per year.

In 2014, *The Housing (Wales) Act (2014)* came into effect, giving local authorities new duties to prevent and relieve homelessness. This dramatically increased the number of people eligible for advice and assistance. Rough sleeping counts also started in 2015, indicating the rate of rough sleeping for the first time.

Technical notes:
Until devolution homelessness policy in England, Scotland and Wales was directed from Westminster.

These graphs show trends in homelessness statistics in relation to key changes to homelessness policy. Data between nations is not comparable due to different policies and reporting processes. All figures are financial year figures unless specified. The graphs do not show all homelessness statistics, in particular Prevention and Relief statistics have been left out due to ease of understanding. Due to changes highlighted below, data within each nation is not necessarily comparable over time.

England:
Acceptances 1977-1983 have been converted from calendar years. 1982 reporting system changed. 1990 methodology change. 1996 legislation change. 2002 legislation change. 2010 rough sleeping count methodology change. Rough sleeping is an annual count and estimate.

Scotland:
1982 reporting system changed. 1990 methodology change. 2001 legislation change. 2003 legislation change. 2012 reporting system change. Rough sleeping is calculated by identifying those who slept rough the night prior to applying for assistance.

Wales:
1982 reporting system changed. 1990 methodology change. 1996 legislation change. Data for 1996/1997 is an average due to a lack of data. 2002 Act. Due to legislative changes, data pre and post April 2015 are non-comparable. Rough sleeping is an annual count and estimate.

Source: Compiled from MHCLG, Scottish Government and Welsh Government

2.2 Exploring the impact – homelessness policy choices in Great Britain

The National Assistance Act (1948)

The history of the legislative response to homelessness dates back to the Poor Law attempts at reforming the character of destitute people, and *The Vagrancy Act (1824).*[2] This Act still criminalises certain aspects of homelessness in England and Wales. It was not until the post-war consensus of universal welfare that national measures to alleviate extreme poverty, destitution and homelessness were attempted.

The post-war reforms to build universal entitlements to education and healthcare were accompanied by an attempt at housing protection for homeless households. *The National Assistance Act (1948)* formally abolished the Poor Laws, and gave new duties to the welfare departments of local authorities to protect 'persons in need'.

The Act provided the first social safety net for citizens who did not pay national insurance, and was deemed necessary for homeless people, disabled people and other vulnerable groups. It states:

'A local authority may, with the approval of the Secretary of State, and to such extent as he may direct, make arrangements for providing residential accommodation for persons aged eighteen or over who by reason of age, illness, disability or any other circumstances are in need of care and attention which is not otherwise available to them.'[3]

The Act was an important forerunner to later and more comprehensive reform, especially in recognising the vulnerability and needs of families with dependent children. It did not, however, lead to the provision of suitable accommodation for homeless families or individuals. The severe housing shortage of post-war Britain was at its worst, and so in reality the local authority response was typically the provision of 'reception centres'.[4]

The Housing (Homeless Persons) Act (1977)

Homelessness was dramatically brought to public attention in 1966 when the BBC broadcast the landmark television drama *Cathy Come Home*. Some 12 million people watched the harrowing tale of Cathy and her husband being separated by unemployment and homelessness, and then Cathy's children being taken into care. Despite the significant public and media response to the film,[5] it took another 11 years for parliament to respond, but it did so with a radical set of reforms.

The 1977 Act provided an entitlement to long-term rehousing for people considered homeless in Great Britain (extending to Northern Ireland in 1988). The Act used a wide-ranging definition of homelessness, defined as having no accommodation in which it is 'reasonable' to expect a person to live. It also extended this to include those likely to become homeless within 28 days. Uniquely, it also gave homeless people the right to legal action in the courts to challenge decisions made by local authorities about their application for re-housing.[6]

2 Vagrancy Act 1824. https://www.legislation.gov.uk/ukpga/Geo4/5/83/section/4
3 The National Assistance Act 1948, Part 3, 1 (a).
4 Crisis (2017) *Not Home Yet: A History of Britain's attempts to Tackle Homelessness*. London: Crisis
5 Daily Telegraph Television Staff (1966) Ministers to see 'Cathy' TV Play. *Daily Telegraph*
6 Housing (Homeless Persons) Act 1977 http://www.legislation.gov.uk/ukpga/1977/48/contents/enacted

Qualifying for assistance

While this was a world first in legally sanctioned long-term rehousing provision for homeless people,[7] the Act also distinguished between those who would qualify for assistance and those who would not. The scope of the Act meant that only households deemed to be in priority need were legally entitled to be rehoused.

Primarily this involved families with dependent children. Single people and childless couples had to prove they met strict vulnerability tests. In addition, homeless people had to prove they were blameless for their situation – that they were not intentionally homeless. Local authorities also only had to consider cases where applicants proved their local connection to the area. The full impact of this set of eligibility rules is explored in Chapter 13 'Homelessness legislation', but the detrimental impact on 'non-priority' homeless people is well evidenced.[8,9]

Notwithstanding the impact of this arbitrary distinction around who qualifies for assistance, *The Housing (Homeless Persons) Act (1977)* has had a dramatic positive impact for those it serves. Since the duties of the Act came into force, more than 4.5 million households[10] have been assisted into alternative long-term housing, commonly referred to as being 'accepted' as statutory homeless.

Fluctuating acceptances

As indicated in figure 2.1 the numbers of households accessing this entitlement have dramatically shifted over time. There are a number of factors that have influenced the fluctuations in 'acceptances' over the last 40 years. First, the late 1970s and 1980s saw the uptake of this new entitlement among eligible homeless households, coupled with a relatively healthy investment in social housing up until that point.

Second, a set of reforms in 2002/3 then had a dramatic impact in reducing acceptances over the subsequent seven years. *The Homelessness Order (2002)*[11] expanded priority need criteria to include those deemed vulnerable as a result of leaving the armed forces or prison, or as result of fleeing violence. It also made 16 and 17 year olds a priority need group.

These reforms came alongside the formal introduction of Homelessness Prevention (now known as Housing Options) via *The Homelessness Act (2002)*.[12] Services to prevent and relieve homelessness became a focus on local authority strategies (which were themselves made a statutory requirement). To back this new focus, the Supporting People programme allocated £1.8 billion of ring-fenced budgets to local areas.[13]

7 Fitzpatrick, S. and Pawson, H. (2016) Fifty years since Cathy Come Home: critical reflections on the UK homelessness safety net, *International Journal of Housing Policy.* Volume 16, 2016 - Issue 4 Pages 543-555
8 Dobie, S., Sanders, B. & Teixeira, L. (2014) *Turned Away: The treatment of single homeless people by local authority homelessness services in England.* London: Crisis.
9 Mackie, P.K., & Thomas, I. (2014) *Nations Apart? Experiences of single homeless people across Great Britain.* London: Crisis.
10 This is a total figure for all published statutory acceptances in England, Scotland and Wales since 1978
11 The Homelessness (Priority Need for Accommodation) (England) Order 2002 http://www.legislation.gov.uk/uksi/2002/2051/pdfs/uksi_20022051_en.pdf
12 Homelessness Act 2002 https://www.legislation.gov.uk/ukpga/2002/7/contents
13 House of Commons Library (2012) *The Supporting People Programme Research Paper 12/40.* London: House of Commons

As demonstrated in figure 2.1 these changes have affected the way in which the statutory homeless system has responded to demand. But the fact remains that the central principle of a right to re-housing has stood the test of time and political fluctuations.[14]

Rough sleeping policy 1990–2003

By the late 1980s rough sleeping had visibly risen in London and other cities. No official data on levels of rough sleeping were available, but by 1990, charities estimated that 3,000 people were sleeping rough on any one night.[15] Locations such as 'Cardboard City' next to Waterloo Station in London had grown in size and notoriety, and there were reports of 'shanty towns springing up around the country'.[16]

In 1990, Housing Minister George Young established the first Rough Sleepers Initiative (RSI), which was a three-year programme for London. It involved £30 million of funding to increase outreach work, provide emergency hostel beds, and provide other forms of temporary and permanent accommodation for people sleeping rough.

This was extended for another three years in 1993, and an additional £60 million allocated. By this time political attention and competition on the issue had increased, with the Labour Party stating that homelessness was 'the visible symbol of all that was wrong with our country'.[17]

Estimating the solution

In 1996, as attention turned to a third phase of the RSI, ministers were faced with the need to extend the programme and funding outside London. However, the lack of data about the geography and scale of rough sleeping made it difficult to allocate budgets reliably.

From 1996, local authorities were asked to provide annual estimates to the government, and so the first 'official' estimates of the scale and distribution of rough sleeping were made.[18] This was an important step forward, providing ministers with a greater chance of judging the progress of policies.

The change of government in 1997 saw a continuation of the work to tackle rough sleeping. The Major Government handed the lessons of the previous seven years to the Blair administration, with a new baseline of data and data collection from which to progress.

Diagnosing wider causes

In 1998, the newly-formed government's Social Exclusion Unit published a report into rough sleeping[19] which, to some extent, broke from previous thinking on the issue. The report diagnosed causes to the problem that were wider than a lack of access to housing. This 'social exclusion' agenda sought to tackle structural factors including unemployment, low incomes and inter-generational poverty, and the individual impacts such as mental health, addiction and family breakdown.

14 Fitzpatrick, S. and Pawson, H. (2016) Fifty years since Cathy Come Home: critical reflections on the UK homelessness safety net, *International Journal of Housing Policy*. Volume 16, 2016 - Issue 4 Pages 543-555

15 Crisis (2017) *Not Home Yet: A History of Britain's attempts to tackle homelessness*. London: Crisis

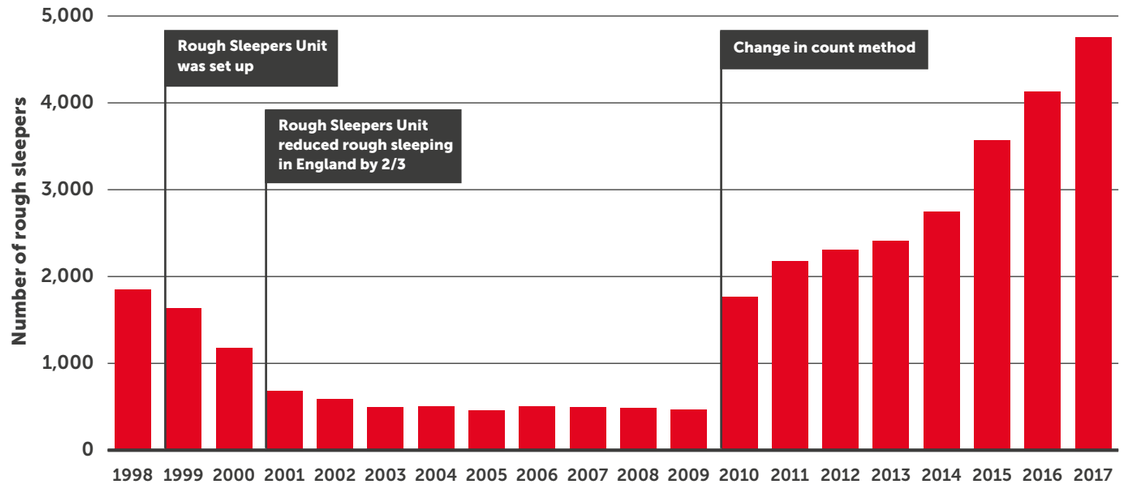
16 Ilott, O., Randell, J., Bleasdale, A. and Noble, E. (2016) *Making Policy Stick. Tackling long-term challenges in government*. London: Institute for Government

17 Ilott, O., Randell, J., Bleasdale, A. and Noble, E. (2016) *Making Policy Stick. Tackling long-term challenges in government*. London: Institute for Government

18 House of Commons Library (2016) *Rough Sleeping (England)*. Briefing paper. London: House of Commons. http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN02007

19 Social Exclusion Unit (1998) *Rough Sleeping*, London: Cabinet Office. http://webarchive.nationalarchives.gov.uk/20010428171911/www.cabinet-office.gov.uk:80/SEU/1998/rough/srhome.htm

Figure 2.3: Rough sleeping in England



Source: MHCLG and RSU

With this approach came newly prescribed solutions. These included prevention measures for care and prison leavers, and a focus on multi-agency action at a local level,[20] overseen by a national co-ordinating body. And so, in 1999, the Rough Sleepers Unit (RSU) was established and handed the target of reducing rough sleeping in England by two-thirds by 2002 (see figure 2.3). The then deputy director of Shelter, Louise Casey, was appointed to lead the Unit.

The RSU achieved its target a year early, applying a range of methods. These included expanding hostel provision, and hiring new specialists in mental health and addiction services. Other methods involved establishing outreach teams to assess rough sleepers, and focussing on preventing those leaving the armed forces, the care system, and prison from sleeping rough.

The evidence for the success of different elements of this approach are assessed in Chapter 8 'Ending rough sleeping'. A crucial element was the political importance and authority ascribed to the target to reduce rough sleeping, and to the RSU itself. The RSU was given cross-departmental authority in Whitehall and a reporting line to the Prime Minister.[21]

It is self-evident in the dramatic rise in England of rough sleeping since 2008 that the absence of political targets, cross-government approaches, and sufficient budgets have all affected the increase in numbers.

The Scottish Rough Sleepers Initiative was established in 1997. In 1999 a target was set to make sure no one had to sleep rough in Scotland by 2003. Through the initiative, the numbers of people sleeping rough who presented to services fell by over

20 House of Commons Library (2016) *Rough Sleeping (England)*. Briefing paper. London: House of Commons. http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN02007

21 Ilott, O., Randell, J., Bleasdale, A. and Noble, E. (2016) *Making Policy Stick. Tackling long-term challenges in government*. London: Institute for Government. https://www.instituteforgovernment.org.uk/sites/default/files/publications/5225%20IFG%20-%20Making%20Policy%20Stick%20WEB.pdf

"I was earning good money as a chef. I did my NVQ level three and I was working at quite a famous restaurant but it became really stressful. I started hanging out with the wrong couple. I got addicted [to spice] very quickly. I lost my job, and ended up in jail for burglary to fund the habit.

When I was due to be released I had my appointment with the housing officer, but that same day the whole jail was in lockdown. I asked for another appointment, but they didn't have any more available so when it came to leave I had nowhere to go. I went straight to the council and they put me in a hotel for a few weeks, but after that they said they couldn't help me anymore. It takes months to go through the housing system and I'm still on the waiting list for a hostel, but until a space becomes available I've had to go on the streets..."

Jimmy, Plymouth

a third between 2001 and 2003. While the target was not met, the initiative led to enhanced support in cities, while in some areas rough sleeping services were set up for the first time. The initiative also drove political and cultural changes within local authorities and led to a much stronger strategic focus on rough sleeping and homelessness at both local and national level.[22]

Tackling veteran homelessness

In 1994, we published research showing that 25 per cent of single homeless people in England had served in the UK armed forces.[23] Publication of this significant finding led, in part, to the formation of the Ex-Service Action Group (ESAG), to address the problem.[24] ESAG themselves published research in 1997, which showed that in London 22 per cent of the homeless population were ex-service personnel.[25] These studies revealed that the ex-services homeless population tends to be more disadvantaged than the wider homeless population. This is because

22 Fitzpatrick, S., Pleace, N., Bevan, M. (2005) *Final Evaluation of the Rough Sleepers Initiative*. Scottish Executive http://www.gov.scot/Resource/Doc/37428/0009584.pdf

23 Randall and Brown (1994) *Falling Out: A Research Study of Homeless Ex-Service People*, London: Crisis.

24 UK Veterans and Homelessness (2008) Royal British Legion https://media.britishlegion.org.uk/Media/2283/litrev_ukvetshomelessness.pdf

25 Gunner, G. and Knott, H. (1997) *Homeless on Civvy Street: Survey of Homelessness Amongst ex-Servicemen*, Ex-Service Action Group (ESAG).

they are older than average, more likely to have slept rough, and more likely to have physical health and alcohol problems.[26] It is worth noting that counter to popular belief, this group did not experience significantly higher levels of Post Traumatic Stress Disorder (PTSD).[27]

This new body of evidence prompted successful cross-departmental political action. The Ministry of Defence (MoD) established the Joint Services Housing Advice Organisation, aimed at providing housing support for people before they left the armed forces. Tackling veteran homelessness became a priority of the Rough Sleepers Unit mentioned above. In 2002, the categories of homeless applicants with a priority need for rehousing were extended to include those deemed vulnerable because of having been a member of Her Majesty's Forces.[28]

By 2008, research in London showed a substantial drop in veteran homelessness, down to six per cent. This is attributed to significant efforts by the MoD to prevent homelessness, and concerted initiatives from ESAG to directly assist people, and indirectly lobby government for their interests.[29]

The Homelessness Etc. (Scotland) Act (2003)

In August 1999, two years after devolution of powers to Scotland, the Scottish Executive established a 'Homelessness Taskforce'. The Taskforce was given a remit to 'review the causes and nature of homelessness in Scotland' and to 'make recommendations on how homelessness in Scotland can be prevented and, where it does occur, be tackled effectively'. The group was made up of a range of sectors and experts, it met more than 30 times in three years, and presented a radical platform of reform in January 2001.[30]

The most significant measure presented was the idea of extending the main homelessness duty to all eligible households by scrapping the concept of priority need. The Scottish Government accepted this recommendation and in 2003, *The Homelessness Etc. (Scotland) Act (2003)* was passed. The Act set a target date (the end of 2012) for the abolition of the priority need test in Scotland.[31] After this date, local authorities in Scotland would be legally obliged to assist the rehousing of all eligible and non-intentionally homeless people.

Phasing out non-priority homelessness

A full exploration of the benefits of different legislative approaches is set out in Chapter 13 'Homelessness legislation', but it is clear that this bold and progressive move has had a dramatic positive impact. As demonstrated in figure 2.1, Scotland has effectively phased out the problem of 'non-priority' homelessness. With this expanded safety-net it has achieved a decline in homelessness that has bucked the trends elsewhere in the UK.[32]

26 Johnsen, S., Jones, A. and Rugg ,J. (2008) *The experiences of Homeless Ex-Service Personnel in London*. Centre for Housing Policy, University of York.

27 The Royal British Legion (no date) *UK Veterans and Homelessness*. London: Royal British Legion https://media.britishlegion.org.uk/Media/2283/litrev_ukvetshomelessness.pdf

28 Homelessness Priority Need for Accommodation (England) Order, 2002 http://www.legislation.gov.uk/uksi/2002/2051/contents/made

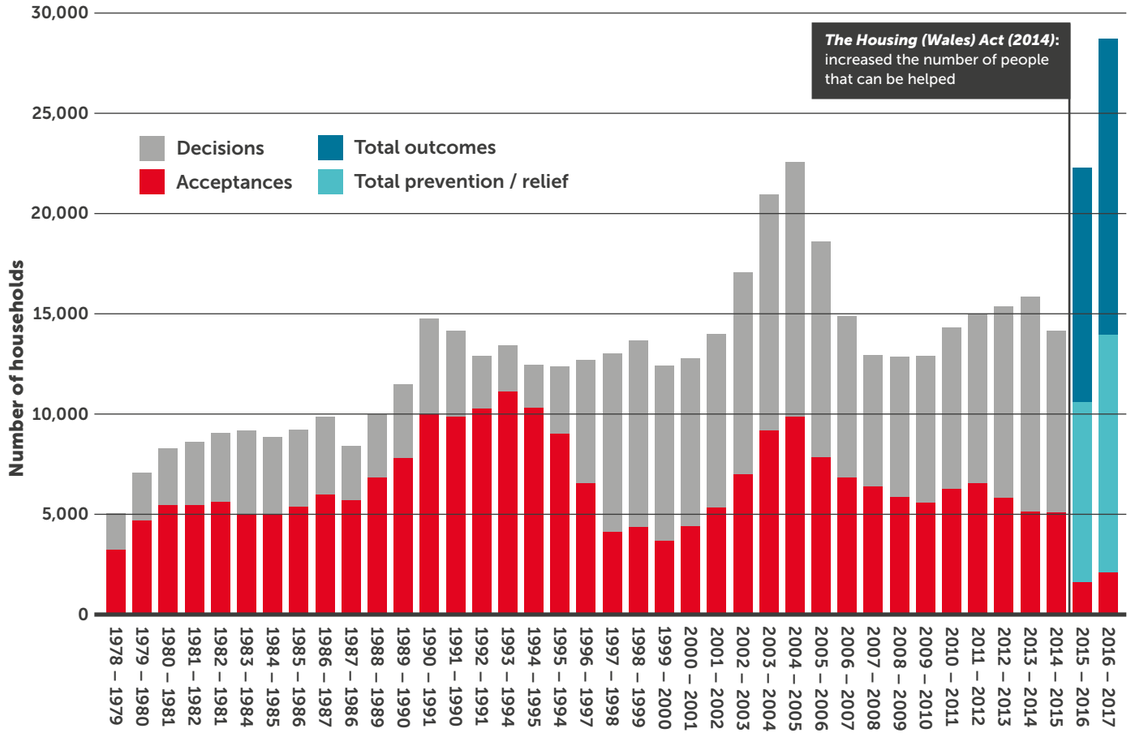
29 Johnsen, S., Jones, A. and Rugg ,J. (2008) *The experiences of Homeless Ex-Service Personnel in London*, Centre for Housing Policy, University of York.

30 Homelessness Task Force (2004) *An Action Plan for Prevention and Effective Response*. Edinburgh: Scottish Executive. http://www.clacks.gov.uk/document/272.pdf

31 Homelessness etc. (Scotland) Act 2003 https://www.legislation.gov.uk/asp/2003/10/contents

32 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. & Watts, B. (2015) *The Homelessness Monitor: Scotland 2015*. London: Crisis.

Figure 2.4: Total decisions / outcomes in Wales



Source: Welsh Government

The abolition of priority need in Scotland should not be presented as a panacea. The recent rises in rough sleeping and of people living in temporary accommodation show how much is still to be done.[33] However, *The Homelessness Etc. (Scotland) Act (2003)* was a political choice that demonstrated the power of positive social policy in tackling homelessness, and is a source of inspiration for international advocates in homelessness.[34]

The Housing (Wales) Act (2014)

Following the advent of primary law making powers for the Welsh Government in 2011, the priority of tackling homelessness through improved legislation soon emerged. It was strongly backed by advocates in the third sector, but also by local authorities and academics.[35] Dr Peter Mackie was commissioned by the Welsh Government to review homelessness legislation, and to make proposals for improvements.

33 Shelter Scotland (2017) *The use of temporary accommodation in Scotland*. Edinburgh: Shelter Scotland.
34 Shelter Scotland (2016) *Homelessness: Far From Fixed Why Scotland needs a National Homelessness Strategy*. Edinburgh: Shelter Scotland https://scotland.shelter.org.uk/__data/assets/pdf_file/0007/1278178/FarFromFixedPolicyPaperFINAL.pdf
35 Public Policy Institute for Wales (2016) *The Development and Implementation of Part 2 of the Housing (Wales) Act 2014: Lessons for Policy and Practice in Wales* http://ppiw.org.uk/files/2017/07/PPIW-Homelessness-Policy-Reunion-Report-July-2017-final.pdf

The Mackie review sought to address two key weaknesses in the existing system. First, a growing inconsistency in preventative 'housing options' approaches, sitting outside the statutory framework, and second, often no 'meaningful assistance' was given to non-priority homeless people, especially single men.[36] In response, Mackie proposed a 'housing solutions' model. This would switch the emphasis of local authorities to preventative and flexible interventions, aimed at resolving homelessness before the 'main' rehousing duty was necessary.[37]

Housing solutions model

The proposed new approach would entail a duty on local authorities to 'take all reasonable steps to achieve a suitable housing solution for all households which are homeless or threatened with homelessness'. Mackie suggested extending the period when someone could be deemed to be threatened with homelessness from 28 to 56 days. He also suggested that the prevention duty should be owed to all applicants, regardless of priority need, local connection or intentionality.[38]

These recommendations were adopted by the Welsh Government, but others were not. Most significantly, a recommendation to provide emergency accommodation to people who had 'nowhere safe to stay' was rejected.

The Housing (Wales) Act (2014) was passed in 2014, with key homelessness duties coming into effect in 2015. The Act requires local authorities to carry out 'reasonable steps' to prevent and relieve homelessness for all eligible households.[39]

These reforms have been largely welcomed in Wales,[40] particularly because they have increased the number of people that can be helped, and have increased the flexibility of local authority services (see figure 2.4).[41] The headline statistics report a 69 per cent reduction in homelessness acceptances between 2014/15 and 2015/16, and for people threatened with homelessness, 65 per cent had it successfully prevented in 2015/16.[42]

As with legal reforms in Scotland, these positive results should be viewed within the context of on-going concerns and unresolved homelessness issues. It is also important to note that the reforms did not reduce the numbers of people needing help; rather it offered a broader and different set of ways to help. *The Housing (Wales) Act (2014)* also did little to tackle rising rough sleeping in Wales. There are concerns that a number of groups are still failing to access meaningful help, including those deemed to have 'failed to co-operate' with housing authorities.[43]

36 Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. & Watts, B. (2015) *The Homelessness Monitor: Wales 2015*. London: Crisis.
37 Mackie, P., Fitzpatrick, S., Stirling, T., Johnsen, S., & Hoffman, S. (2012) *Options for an Improved Homelessness Legislative Framework in Wales*. Cardiff: Welsh Government.
38 Mackie, P., Fitzpatrick, S., Stirling, T., Johnsen, S., & Hoffman, S. (2012) *Options for an Improved Homelessness Legislative Framework in Wales*. Cardiff: Welsh Government.
39 Housing (Wales) Act 2014 http://www.legislation.gov.uk/anaw/2014/7/contents/enacted
40 Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. & Watts, B. (2017) *The homelessness monitor: Wales 2017*. London: Crisis
41 Shelter Cymru (2016), *Reasonable Steps: Experiences of Homeless Services Under the Housing (Wales) Act 2014*. https://sheltercymru.org.uk/wp-content/uploads/2015/02/Reasonable-Steps.pdf
42 Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. & Watts, B. (2017) *The Homelessness Monitor: Wales 2017*. London: Crisis
43 Mackie, P., Thomas, I. and Bibbings, J. (2017) 'Homelessness prevention: reflecting on a year of pioneering Welsh legislation in practice, *European Journal of Homelessness,* 11(1): 81-107 https://www.feantsaresearch.org/download/article-4592410342917616893.pdfhttp://www.feantsaresearch.org/download/article-4592410342917616893.pdf

Cross party political support for the passing of *The Homelessness Reduction Act (2017)*: Second Reading (October 2016)

Notwithstanding these concerns, the 2014 Act is another strong example of the power and positive impact that focused public policy interventions can have in preventing and tackling homelessness.

The Homelessness Reduction Act (2017)

The two-tier homelessness system created by *The Housing (Homeless Persons) Act (1977)* has long been a source of concern for homelessness advocates.[44] As detailed above, the introduction of the entitlements for re-housing has successfully helped end homelessness for more than 40 years. However, for many 'non-priority' and other ineligible households, that help is not available.

Evidence of the impact of this distinction is not hard to find. In its most acute form, rough sleeping represents the failure of the homelessness safety net to catch people who need help, but so too does the many thousands of people living in hostels, night shelters, cars, etc.[45]

Following the introduction of legal reforms in Scotland (2003) and then Wales (2014), England has been the last country in Great Britain to consider legal reforms to widen the statutory homelessness safety net. In 2014 we published our *Turned Away* report. This documented the experiences of 'mystery shoppers' who presented cases of single homelessness and significant vulnerabilities in 87 local authority visits across England.[46]

The report painted a picture of systematic 'gatekeeping' whereby people were denied the chance to explain their needs and access services. It also revealed how poorly homeless people can be treated by local authority housing professionals.

In 2015, we assembled a panel of experts to consider options for legal reform in England. This group was drawn from leading homelessness charities, academia, local authorities, housing specialists and leading legal experts. It was chaired by Professor Suzanne Fitzpatrick from Heriot-Watt University. Over six months, the group considered recommendations for reform that would increase entitlements for single homeless people, and also protect the duties owed to priority households (typically families with dependent children).

Recommending reform

In February 2016, the panel produced a set of proposals that owed much to the emerging example in Wales. The proposals focused heavily on the benefits of both homelessness prevention, and of removing eligibility barriers for homeless households when accessing prevention and relief assistance.[47] These proposals were crafted into a potential Bill to demonstrate to parliamentarians the necessary legal steps for achieving the aims of the panel report.

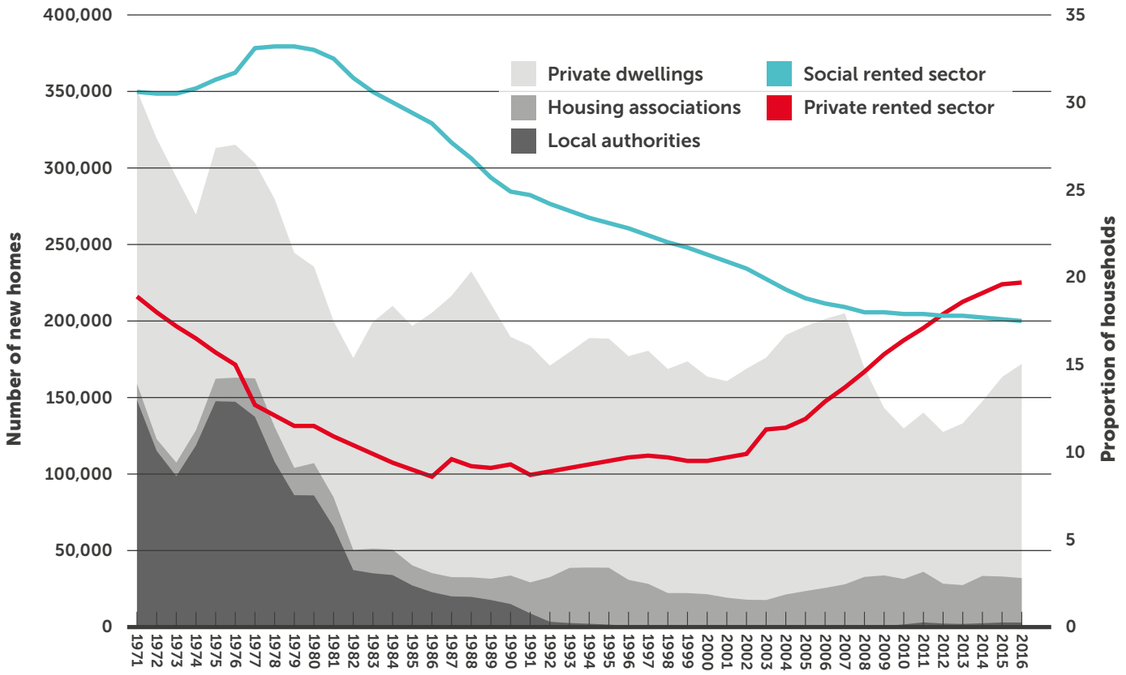
Later in 2016, Conservative back-bench MP Bob Blackman was drawn in the private members' ballot for the parliamentary session, and chose to adopt the reforms set out by the panel. Mr Blackman's proposals became the Homelessness Reduction Bill,[48] for which he gained cross-party and government support. The bill received royal assent in April 2017.

The duties contained in *The Homelessness Reduction Act (2017)* came into force in April 2018, and so the impact of the new duties to prevent and relieve homelessness are as yet unknown. As with the recent changes in Wales, the final legislation did not contain suggested duties to give emergency accommodation to those in immediate danger of rough sleeping. Nonetheless the Act is a radical reform made possible by a renewed political appetite to tackle homelessness.

44 Crisis (2017) *Not Home Yet: A History of Britain's attempts to Tackle Homelessness.* London: Crisis
45 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis
46 Dobie, S., Sanders, B. and Teixeira, L. (2014) *Turned Away: The treatment of single homeless people by local authority homelessness services in England*. London: Crisis.

47 Crisis (2015) *The homelessness legislation: an independent review of the legal duties owed to homeless people.* London: Crisis
48 Homelessness Reduction Act 2017 https://services.parliament.uk/bills/2016-17/homelessnessreduction.html

Figure 2.5: Trends in housing, Great Britain



Source: MHCLG

2.3 The impact of wider public policy

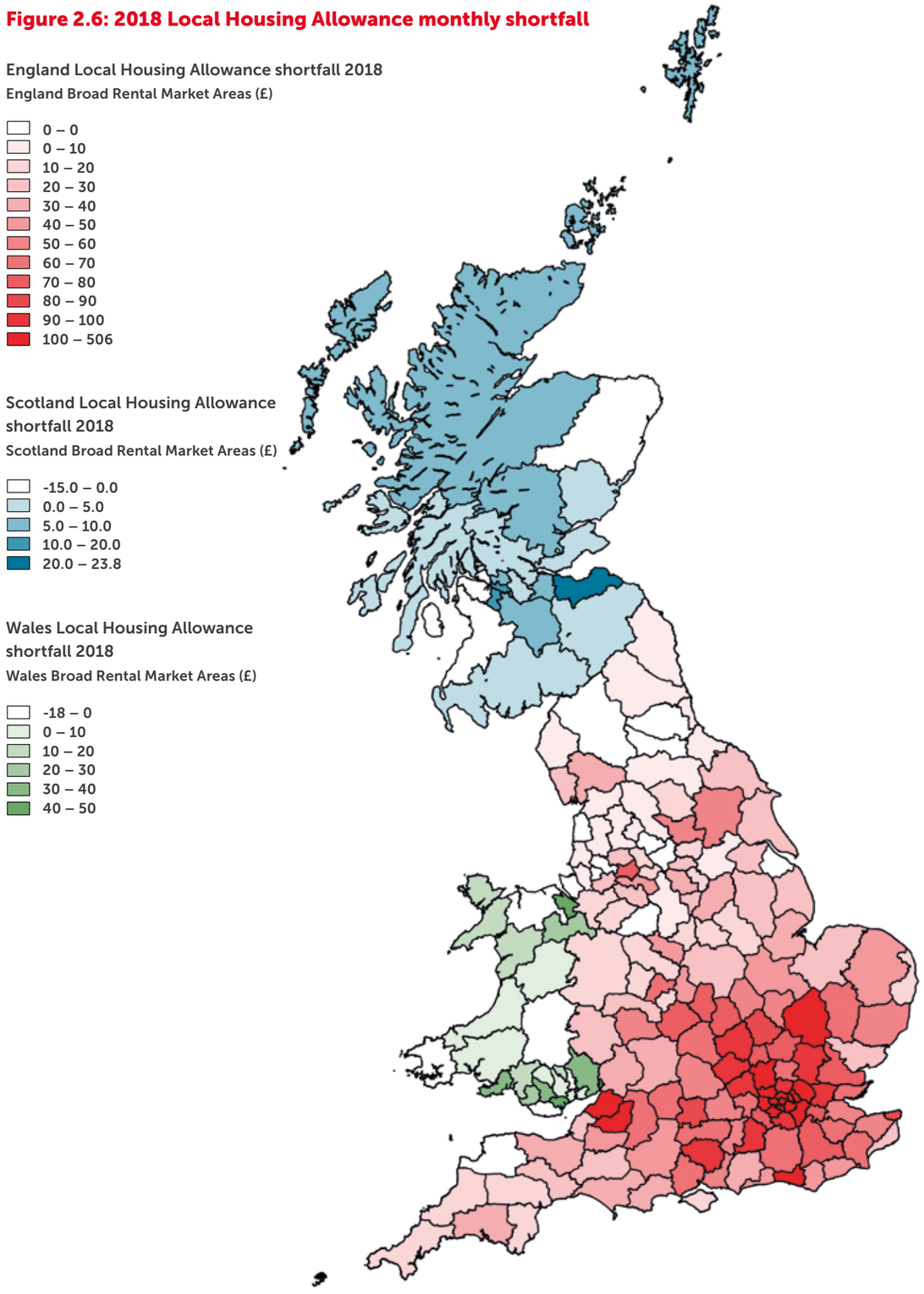
The homelessness policies and initiatives listed in this chapter represent the largest and most successful targeted domestic public policy on homelessness to date. They show what can be achieved when politicians make bold decisions and seize the agenda. However, it is worth noting the influence of non-homelessness policy in driving trends over time. Wider policy in housing and welfare may not be driven by imperatives to tackle homelessness, but they do have a direct impact on the problem, and indirectly affect the efficacy of homelessness policy and practice.

Figure 2.5 illustrates the decline in house building and availability of social rented accommodation over the last 45 years. In 1970, there were 157,026 local authority housing completions across the UK. By 2004 this had dropped to just 140, and the latest data for 2016 showed 3,305 completions.[49] The lack of affordable housing to tackle homelessness, including the reduction in available stock through right to buy, are explored fully in Chapter 11 'Housing solutions to homelessness'. However, it is clear that the chronic lack of accessible and affordable supply is a key determinant in whether local authorities across Britain can discharge their homelessness duties. This is regardless of how progressive the homelessness policies are.[50]

49 Wilcox, S., Perry, J., Stephens, M., & Williams, P. (2018) *UK Housing Review.* London: Chartered Institute of Housing and Heriot-Watt University

50 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. & Watts, B. (2016) *The Homelessness Monitor: Great Britain 2016,* London: Crisis.

Figure 2.6: 2018 Local Housing Allowance monthly shortfall



Source: Crisis analysis of data from the Valuation Office Agency (England), Rent Officers Wales and Rent Service Scotland

Challenges to assistance

While overall supply of affordable accommodation directly affects homelessness trends, local authorities consistently cite changes in welfare policy (and particularly Housing Benefit reductions) as posing the greatest challenge in assisting homeless people. While the three nations of Great Britain have different statutory frameworks for tackling homelessness, and varying housing pressures, the limitations posed by welfare policy are felt strongly in all countries.[51]

Chapter 10 'Making welfare work' contains a full exploration of welfare policies impacting homelessness. But figure 2.6 demonstrates clearly the current gap between private rental prices and the Local Housing Allowance rates available in those areas. As with the lack of affordable housing supply, this is a policy choice made by successive governments that both causes homelessness and restricts the ability of local authorities to address it. The failure to address causal elements of homelessness in welfare policy can also call into question the very logic and value for money of government strategies seemingly at odds with each other.[52]

2.4 Homelessness and economic cycles

There is a strong link between people experiencing poverty and an increased risk of homelessness.[53] Further recent evidence has highlighted the link between the risk of homelessness and experience of childhood poverty.[54] Logically those with the lowest levels of income are at greatest risk of not being able to afford housing costs.

However, it is not inevitable that economic recession and high unemployment will lead to homelessness in greater numbers than at points of relative prosperity in economic cycles (see figure 2.1). This is partly because recession can lead to greater affordability of housing costs, driven largely by increased affordability of mortgage payments.[55] It is also because policy makers can decide whether (or not) to provide a social security safety net that offers sufficient protection from homelessness when required.[56]

Unemployment rates do not necessarily correlate with trends in homelessness acceptances. Indeed there have been points in the late 1980s and early 2000s when the opposite occurred. This can be explained in part by the time-lag effect of unemployment leading to homelessness.[57] But it must also be attributed to the effectiveness of protections in social security, including homeless prevention and rehousing. The key test for policy makers is whether and how they are prepared to complete this safety net to fully protect those at risk during economic downturns and recessions.

2.5 Conclusion

Public policy initiatives to tackle and reduce homelessness are proven to make a lasting and positive impact. The reforms outlined in this chapter show that homelessness is a phenomenon that can be predicted and prevented. For those who do lose their home, it is a problem that can be solved quickly and permanently.

The Housing (Homeless Persons) Act (1977) provided the basic entitlements to homelessness support from which both extended rights and targeted interventions have successfully grown.

However, decades of under-investment in affordable housing and recent erosion of welfare entitlements have seriously undermined the impact of homelessness protections and local governments' ability to deliver them.

The question for governments across Great Britain must now be whether they are prepared to complete the job of policy making to end homelessness. Homelessness policy is now devolved, but in all three nations there still exist populations for whom the statutory safety net is insufficient.

Will the current renewed policy attempts in Scotland[58] and England,[59] or future attempts in all three nations, address these gaps for ineligible and ill-served groups such as rough sleepers, or migrant homeless people? And crucially, will the wider structural causes of homelessness in housing supply for each government, and welfare reform for the Westminster Government, be woven into future policy?

Further chapters in this report lay out the necessary policy changes to achieve an end to homelessness over time across Great Britain.

51 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. & Watts, B. (2016) *The Homelessness Monitor: Great Britain 2016*, London: Crisis.
52 The National Audit Office, Homelessness, HC 308, Session 2017-2019, September 2017. https://www.nao.org.uk/wp-content/uploads/2017/09/Homelessness.pdf
53 Johnsen, S., & Watts, B. (2014). *Homelessness and poverty: reviewing the links*. Heriot-Watt University.
54 Bramley, G. and Fitzpatrick, S. (2017): Homelessness in the UK: who is most at risk?, *Housing Studies*. Volume 3. Issue 1: 96-116. https://www.tandfonline.com/doi/full/10.1080/02673037.2017.1344957#abstract
55 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. & Watts, B. (2012) *The homelessness monitor: England 2012*, London: Crisis.
56 Stuckler, D. and Basu, S. (2013) *The Body Economic: Why Austerity Kills*. New York: Basic Books.
57 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. & Watts, B. (2012) *The Homelessness Monitor: England 2012*, London: Crisis.
58 Scottish Government (2017) *Homelessness and rough sleeping action group*. Edinburgh: Scottish Government https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group
59 MHCLG (2017) *Government to lead national effort to end rough sleeping*. London: MHCLG. https://www.gov.uk/government/news/government-to-lead-national-effort-to-end-rough-sleeping

"I walked out of my marriage after 21 years. My husband had an accident in the Navy and had to retire early. He was physically abusive and tried to control everything I did.

One day last year I'd just had enough and I walked out. It wasn't planned. I didn't know where to go.

I was in a horrible hostel for about two months when I first left, but the place I'm in now is much nicer and I'm starting to feel a lot more positive about the future... There are people on drugs, and sometimes my food goes missing from the kitchen. Just small things, but they can wear you down when you've lived in a beautiful four-bedroom home for years. I'm doing ok though. When I've sorted myself out I'm hoping to get back to work. I know things are going to be all right."

Lorna, Plymouth

Chapter 3:

Defining homelessness ended

This chapter explains the definition of ending homelessness we use throughout this plan, setting out each of the five elements and their detailed meanings. The chapter also explains the wider context informing the definition and the process used to refined it.

The definition of homelessness ended

1. No one sleeping rough.

2. No one forced to live in transient or dangerous accommodation such as tents, squats and non-residential buildings.

3. No one living in emergency accommodation such as shelters and hostels without a plan for rapid rehousing into affordable, secure and decent accommodation.

4. No one homeless because of leaving a state institution such as prison or the care system.

5. Everyone at immediate risk of homelessness gets the help they need to prevent it happening.

3.1 Introduction

Perhaps the first question to address in a plan to end homelessness is what exactly do we mean by 'ending' it? How do we define that aim and explain its component parts?

During 2017, we spent six months consulting people who have experienced homelessness and those working in the sector across England, Scotland and Wales. Our aim was to agree a definition for use in this plan.[1]

This chapter sets out why a definition matters, its usefulness, and the factors considered in deciding it. All five elements comprising the definition are then explained.

3.2 Why a definition matters

Across Great Britain there are a range of different definitions applied to homelessness. These include legal definitions that relate to statutory duties,[2] but there is no consistent or recognised definition of what an end to homelessness means.

The most developed framework for defining an end to homelessness has been the European Typology of Homelessness and Housing Exclusion 'ETHOS'[3] from the European Federation of National Organisations Working with the Homeless (FEANTSA). This is the umbrella body for homelessness organisations across Europe. The ETHOS definitions are instructive for a domestic context, and were used to assist the development of the definitions in this plan. But they do not fully capture the specifics of a British context.

Between any two homelessness charities, or local authority housing teams, there is often no consistent definition of homelessness ended. At national government level, there is no such definition in any of the three countries. This means that at an individual level and across Great Britain there is no consistent description of the aims for which the different funding, interventions or policy frameworks are striving.

The lack of common agreement and application of a shared definition is a fundamental weakness in the fight to end homelessness. An approach using an agreed and consistent definition has a number of benefits. These are suggested below.

Sharing ambition
Raising our sights to consider a future where homelessness is ended – however that is defined – would allow all those participating in efforts to tackle homelessness to have a shared vision. It also allows them to see their component activity as part of that ambition. Without definition, advocates, policy makers and service providers risk disassociated or even conflicting ambitions.

Ending homelessness will not be an easy or short task, but sticking to a shared ambition, articulated through a definition, will help retain a shared understanding of the task over time.

1 This included three conferences hosted by Crisis in London, Cardiff and Glasgow in April-May 2017. Up to 300 delegates were invited to challenge it and to feed back any thoughts or suggestions they had for improvements. Clients from Crisis and other homelessness services were also consulted with.
2 *Homelessness data: notes and definitions* https://www.gov.uk/guidance/homelessness-data-notes-and-definitions; Shelter Cymru (2018) *'What is the legal definition of homelessness?' is the legal definition of homelessness?* https://sheltercymru.org.uk/get-advice/homelessness/help-from-the-council/what-will-the-council-check/what-is-the-legal-definition-of-homelessness/; Shelter Scotland (no date) *'Am I homeless'*. https://scotland.shelter.org.uk/get_advice/advice_topics/homelessness/help_from_the_councils_housing_department/the_councils_homelessness_tests/are_you_homeless
3 FEANTSA (no date) 'ETHOS - European Typology of Homelessness and housing exclusion' https://www.feantsa.org/download/en-16822651433655843804.pdf

"It was always made clear that university was my only option. I was always drawn to more creative things but I never really enjoyed art at school because I have dyspraxia and was always told I could never draw at all.

I struggled with self-esteem... when I moved away from home [to university] it stopped being just a bad experience and became something that affected every part of my life... At the end of my second year I just didn't go back...

I moved in with some friends and got a job in a shop, but it closed and then things became really serious.

I had a couple of months of savings, so I stayed in my flat for a little while longer. But then one day I moved into my car because I couldn't pay the rent anymore. I ended up there for over six months.

I would park wherever it was free, but I spent a long time outside a local library... I think it was the staff in the library who finally called the outreach team and helped me get into the hostel.

Getting back in touch with my family was really hard. A mental health worker helped me break it down into little steps, and now our relationship is slowly getting rebuilt. I was put in touch with a landlord who agreed to rent me a flat at the maximum amount of Housing Benefit I was allowed – which is still £300-400 below the going market rate in Oxford. Having my own place and being trusted to pay rent every month gave me much more confidence.

Hopefully, a few years down the line I will be in a very different place and have lots more good experiences that can define who I am, rather than this other period of my life."

Emma, Oxford

Agreeing data
As shown in Chapter 14 'Homelessness data', data collection in homelessness is fragmented, inconsistent and in some cases unreliable.[4] A common definition of homelessness ended will facilitate a more consistent and reliable approach to agreeing the data we seek, and promote shared methodologies for data collection.

Monitoring progress towards a shared goal of ending homelessness, using an agreed definition, allows the data collected against this goal to show the success of policies and interventions. This then means effective and consistent use of evidence in decision-making.

Chapter 14 includes the case for establishing a 'what works' approach in homelessness, with a proposed outcomes framework for reporting against top-level targets and indicators of success.

Increasing efficiency
An agreed focus on outcomes would reduce time spent on activities outside those aims, and allow an audit of planned policies and activities to achieve our aims. It would also focus resources on commissioning effective and targeted solutions to achieving these goals at a national and local level.

Challenging interventions
The rapid evidence reviews[5 6] undertaken for this plan have revealed a large number of interventions that have an evidence of effectiveness in tackling homelessness. They have also revealed many that do not and significant gaps in evidence-based provision. A shared definition of homelessness ended is a direct challenge to interventions without a robust evidence base, and those without a track record of success.

The same principle applies to government policy. Once a definition is adopted it can be used to guide and challenge the effectiveness of those policy choices.

Driving political ownership
A definition for ending homelessness adopted and promoted by governments in each nation would be a powerful platform for making political choices needed to tackle the problem. It would allow existing policy and new policy development to be scrutinised, and legitimise involving a wider set of government departments and initiatives. It would also provide a framework of success that government budgets are directed towards.

Examples such as the Rough Sleepers Unit in England show political ownership, driven by a clear target, can bring successful cross-departmental approaches.[7] As recently detailed by the National Audit Office in England, the absence of shared targets and approaches can lead to counter-productive political choices on homelessness.[8 9]

4 UK Statistics Authority (2015) *Statistics on homelessness and rough sleeping in England*. London: UK Statistics Authority https://www.statisticsauthority.gov.uk/publication/statistics-on-homelessness-and-rough-sleeping-in-england-department-for-communities-and-local-government/

5 Mackie, P. Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: What works? And international evidence review*, London: Crisis

6 Social Care Institute for Excellence (2018) *A rapid evidence assessment of what works in homelessness services*, London: Crisis

7 Ilott, O., Randall, J., Bleasdale, A. and Norris, E. (2016) *Making Policy Stick. Tackling long-term challenges in government*. London: Institute for Government. https://www.instituteforgovernment.org.uk/sites/default/files/publications/5225%20IFG%20-%20Making%20Policy%20Stick%20WEB.pdf

8 The National Audit Office, Homelessness, HC 308, Session 2017-2019, September 2017. https://www.nao.org.uk/wp-content/uploads/2017/09/Homelessness.pdf

9 Commons Select Committee (2017) *Government's complacent attitude has failed homeless*. https://www.parliament.uk/business/committees/committees-a-z/commons-select/public-accounts-committee/news-parliament-2017/homeless-households-report-published-17-19/

3.3 Informing the definition – wider factors

For a definition to attract support it should reflect the circumstances of the jurisdictions where it operates. Below are some key factors that have been considered and have helped shape the definition of homelessness ended for England, Scotland and Wales.

Existing systems and context
Homelessness is not a uniform experience in different geographies, and neither is it experienced in the same ways for the same cohorts of people. For example, the North American rough sleeping and hostel/night shelter populations contain a high proportion of people who are armed forces veterans.[10] Consequently, in North America, strategies to end homelessness involve definitions and targets that recognise this homeless population.[11] In Great Britain, this issue has been significantly reduced through government intervention.[12 13]

In the British context there are some well-defined cohorts of homeless people that exist because of the legal duties owed to them. For example, the term 'priority homeless' defines a group of people who have met an arbitrary set of legal tests in England and Wales. Other groups exist for the opposite reason, particularly the recent phenomenon of homeless people defined as having No Recourse to Public Funds.[14]

These domestic differences are why it has not been possible to adopt wholesale the FEANTSA 'ETHOS' approach, or any others from comparative contexts. It is also significant, when comparing definitions across Europe and beyond, that the hostel and supported accommodation system in Great Britain is very well developed and frequently used.

Reflecting the reality of life for homeless people
Definitions of 'homelessness ended' cannot be an academic exercise. They must reflect the views and experiences of people with lived experience of the issue, and even the views of people who may not consider themselves homeless. For example, people living in overcrowded accommodation may not consider themselves homeless or that their homelessness is 'ended' when living somewhere less crowded.

This is why we undertook an extensive consultation, during spring 2017, with people who have experienced homelessness.[15]

10 National Alliance for Ending Homelessness published figures for January 2016 show a total of 39,471 veterans recorded as homeless in the USA. https://endhomelessness.org/resource/veteran-homelessness/

11 National Alliance to End Homelessness (2017) *How Many Veterans Experience Homelessness?* https://endhomelessness.org/homelessness-in-america/who-experiences-homelessness/veterans/

12 Homeless Link (2016) *Supporting people with no recourse to public funds (NRPF) Guidance for homelessness services*. London: Homeless Link. https://www.homeless.org.uk/sites/default/files/site-attachments/Supporting%20people%20with%20no%20recourse%20to%20public%20funds%20(NRPF)%202016.pdf

13 Johnsen, S., Jones, A. Rugg, J. (2008), *The experiences of Homeless Ex-Service Personnel in London*, Centre for Housing Policy, University of York.

14 Homeless Link (2016) *Supporting people with no recourse to public funds (NRPF) Guidance for homelessness services*. London: Homeless Link. https://www.homeless.org.uk/sites/default/files/site-attachments/Supporting%20people%20with%20no%20recourse%20to%20public%20funds%20(NRPF)%202016.pdf

15 Consultation with people who have experienced homelessness took place in several ways: with clients accessing Crisis services across Great Britain, with clients from other organisations; and with delegates at each of the conferences hosted by Crisis in London, Cardiff and Glasgow in April-May 2017.

Recognising the political audience
To build consensus around a goal of ending homelessness among decision makers, we must understand the parameters of a definition for ending homelessness and how this will influence their decisions.

Some politicians may not subscribe to a definition that fails to include an end to wide, structural causes of homelessness such as low wages, unemployment, or lack of affordable house building. Other politicians may only subscribe to a goal of ending homelessness if the definition is restricted to a discreet cohort that offers a shorter-term prospect of success.

To take account of this delicate balance we have gathered informed opinion from a cross-party expert advisory board of politicians and decision makers who have led political change on homelessness in England, Scotland and Wales.[16]

This process inevitably involves pragmatic compromise, but the decision-maker audience must be taken into account if political and government ownership of the goal to end homelessness is the aim.

Framing the issue of homelessness
Chapter 4 'Public attitudes and homelessness' is dedicated to the issue of public understanding and responses to the issue of homelessness. It has been informed by a ground-breaking study from the FrameWorks Institute. The study looks at how the general public understands and responds to the way homelessness is framed by advocates such as ourselves and by wider media coverage.[17]

The FrameWorks study also reveals a set of problems in the way advocates for tackling homelessness talk about the issue. These have been instructive in forming the definition of homelessness ended. Of particular concern is that general public cynicism about the aim of ending homelessness is driven by descriptions of how large, wide-ranging and complicated the problem is.[18]

Of further concern is the public perception of who the homeless population is, and why they became so. The study revealed a strong view among the public that homeless people are primarily rough sleeping, older white men, and that their homelessness is caused by bad life choices and addictions.

Analysis reveals that this factually incorrect perception of homelessness is actually driven or reinforced by the messages, imagery and descriptions used by the homelessness sector.[19]

So it is important that the definition and how it is communicated inspire the general public to support ending homelessness. This means striving for a definition that does not engender fatalism and cynicism about homelessness. It also means avoiding a simplistic or narrow presentation of the problem that could reinforce incorrect stereotypes.

16 The Expert Advisory Board is made up of Lord Best OBE, Jackie Baillie MSP, Nick Raynsford (Former Labour MP and Housing Minister), Mark Prisk MP, Tamsin Stirling (former Special Advisor Wales).
17 O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom*. Washington: FrameWorks Institute.
18 O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom*. Washington: FrameWorks Institute.
19 O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom*. Washington: FrameWorks Institute.

3.4 Functional zero and absolute zero

The definition of homelessness ended is in many ways a choice made about the scale of ambition we are seeking. Within homelessness academia there is a debate about how best to define this ambition, and indeed what the terminology represents. The common discussion is whether to aim for 'functional zero' or 'absolute zero'?[20]

Functional zero usually refers to ending or reducing the most acute forms of homelessness. The original version of functional zero in the US was described as:

"At any point in time, the number of Veterans experiencing sheltered and unsheltered homelessness will be no greater than the current monthly housing placement rate for Veterans experiencing homelessness."[21]

This restricts the definition of ending homelessness to a situation where numbers of 'sheltered and unsheltered' people are not going up.

The functional zero concept has since developed to one where rough sleeping and long-term homelessness has been addressed. An often-cited example is the Canadian city of Medicine Hat, which declared in 2015 that it had ended homelessness.[22]

What this actually meant was that nobody was sleeping rough and that the time people spent in night shelters was going down.[23] It did not mean that other forms of homelessness were addressed, and crucially, was not about reducing the flow of people onto the streets or into night shelters.

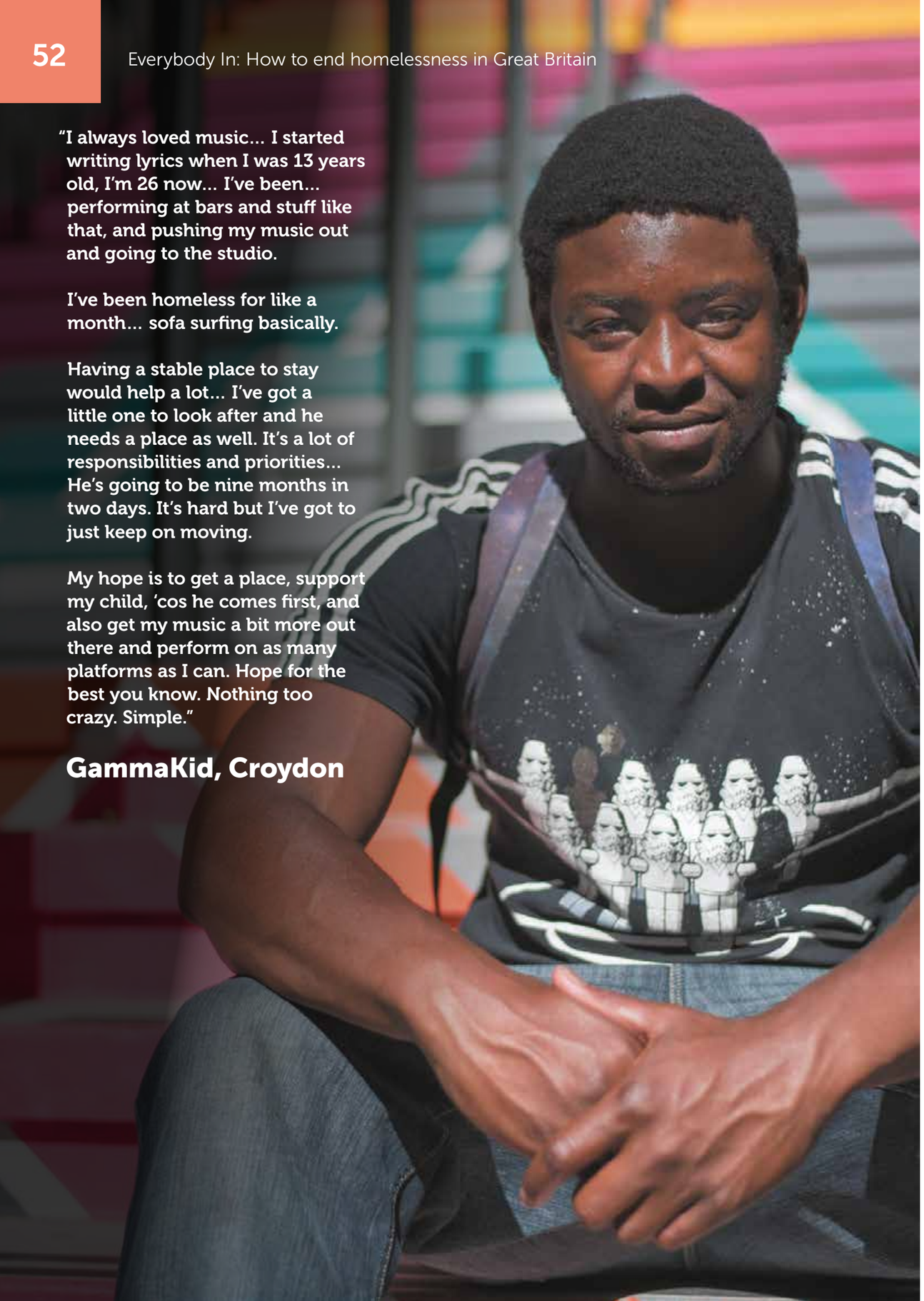
In Great Britain the nearest to functional zero would be the success of the Rough Sleepers Initiative in reducing the number of people sleeping rough by two-thirds.[24]

Most recently, the concept of functional zero has been developed further to include the idea that demand for homelessness services should be reduced. This is either by providing rapid rehousing to existing homeless people, or by identifying people at acute risk and preventing their homelessness.[25]

Absolute zero refers to a utopian end to homelessness where everybody has access to housing and support and nobody is even at risk of homelessness.

This implies the kind of wider structural and societal shifts that are usually outside the scope of homelessness policy, but it is nevertheless useful to consider the broad areas involved.

20 Turner, A. Albanese, T. and Pakeman, K. (2017) Discerning 'Functional And Absolute Zero': Defining and Measuring an End To Homelessness In Canada in *School of Public Policy*, University of Calgary. Vol. 10 Issue 2.
21 Pakeman, K. (2017) *Discerning 'functional and absolute zero': Defining and measuring an end to homelessness in Canada*. School of Public Policy, University of Calgary
22 BC Radio Canada (2015) *Medicine Hat becomes the first city in Canada to eliminate homelessness* http://www.cbc.ca/radio/asithappens/as-it-happens-thursday-edition-1.3074402/medicine-hat-becomes-the-first-city-in-canada-to-eliminate-homelessness-1.3074742
23 Lawrynuik, S. (2017) *Medicine Hat maintaining homeless-free status 2 years on* CBC News 26 Jan http://www.cbc.ca/news/canada/calgary/medicine-hat-homeless-free-update-1.3949030
24 Wilson, W. (2018) *Rough sleeping (England)*, House of Commons library briefing paper
25 Turner, A. Albanese, T. and Pakeman, K. (2017) Discerning 'Functional And Absolute Zero': Defining and Measuring an End To Homelessness In Canada in *School of Public Policy*, University of Calgary. Vol. 10 Issue 2.



"I always loved music... I started writing lyrics when I was 13 years old, I'm 26 now... I've been... performing at bars and stuff like that, and pushing my music out and going to the studio.

I've been homeless for like a month... sofa surfing basically.

Having a stable place to stay would help a lot... I've got a little one to look after and he needs a place as well. It's a lot of responsibilities and priorities... He's going to be nine months in two days. It's hard but I've got to just keep on moving.

My hope is to get a place, support my child, 'cos he comes first, and also get my music a bit more out there and perform on as many platforms as I can. Hope for the best you know. Nothing too crazy. Simple."

GammaKid, Croydon

The evidence for housing and welfare policy affecting homelessness is well made across the UK.[26] So in considering the definition of homelessness ended, it is necessary to at least include areas of wider structural change also needed to achieve absolute zero.

In a British context, the concepts of functional and absolute zero seem inadequate – one is too narrow and the other unrealistic. Housing sector experts consulted on our definition of homeless ended emphasised that the first goal must be to halt the recent rise in homelessness, projected to continue if policies remain unchanged.[27]

It has been useful to use the strengths from both approaches and to see functional zero as a staging post of progress towards absolute zero.[28] Our definition aspires to an end to different forms of homelessness, but it also assumes it is reasonable to aspire to breakthrough success in different forms of homeless prevention. We can have this confidence because we know there are effective and evidence-based approaches available to tackle each element of homelessness identified.

The definition does, however, stop short of defining an end to homelessness in its broadest possible sense. For example, it does not address problems such as sub-standard accommodation or over-crowding. These issues are clearly important, but would make the strategies to achieve the aim more complex. Through the consultation they have emerged as being outside the priorities for defining homelessness as 'ended'.

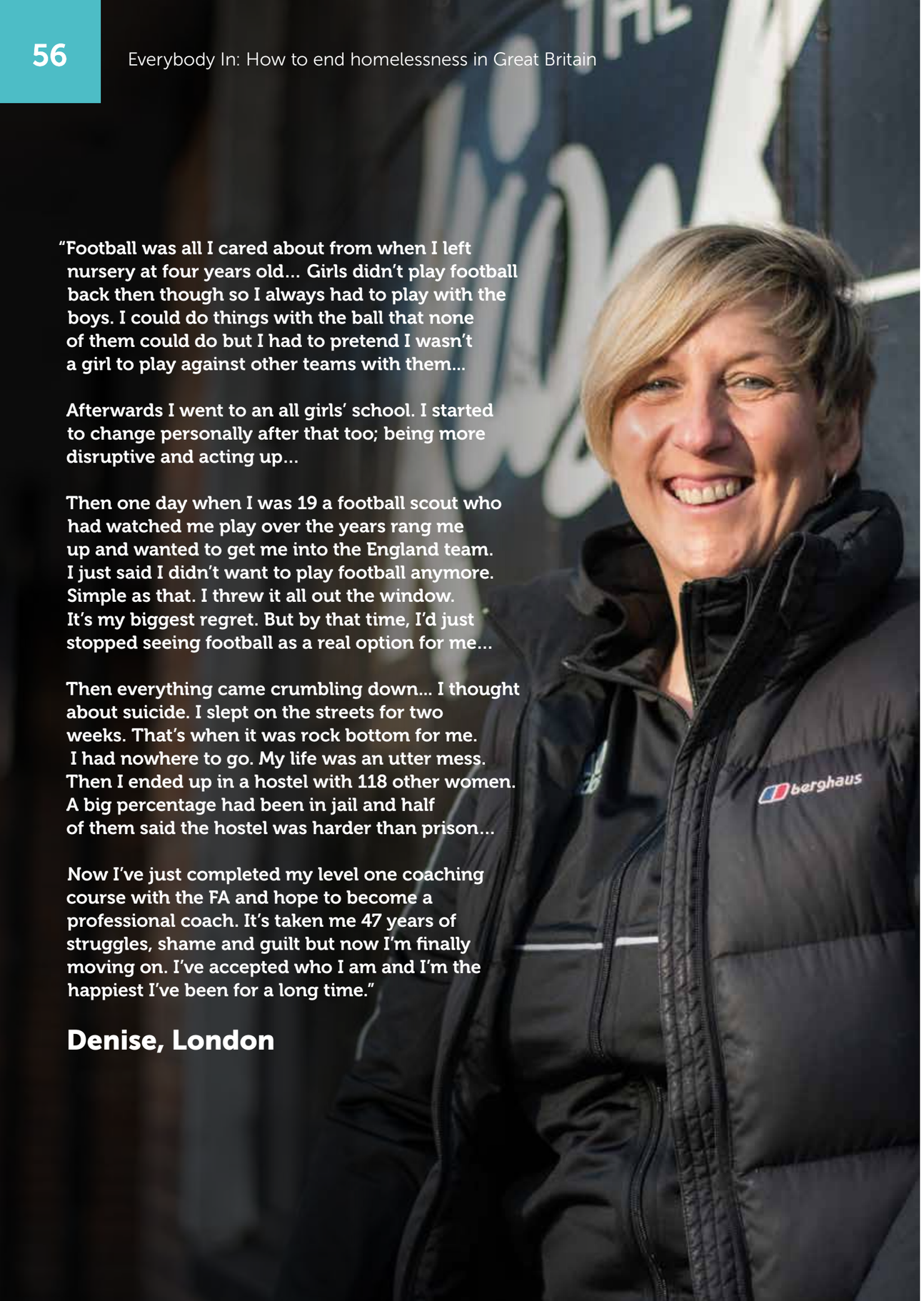
26 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2016) *The homelessness monitor: Great Britain 2016*, London: Crisis.
27 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis.
28 Turner, A. Albanese, T. and Pakeman, K. (2017) Discerning 'Functional And Absolute Zero': Defining and Measuring an End To Homelessness In Canada in *School of Public Policy*, University of Calgary. Vol. 10 Issue 2.

3.5 The definition in detail

The following table gives further details about what is meant by each individual element, and the considerations made during the consulation process that fed into it.

Definition	Explanation	Consideration
1. No one sleeping rough.	As stated, this represents an absolute end to rough sleeping.	This moves on from the No Second Night Out approach where people get help once they have been verified as rough sleepers. [31] It aims for a complete and total end to the most dangerous form of homelessness.
2. No one forced to live in transient or dangerous accommodation such as tents, squats and non-residential buildings.	This refers to people who are living in vulnerable housing situations outside of the homelessness system. This includes people squatting, living in cars, tents and non-residential buildings. It also includes the 'sofa surfing' group.	This is about the group of people outside the homelessness system, but not recognised as rough sleeping; their only choice is to live in this situation. Transient also refers to people forced to live in other people's accommodation – otherwise known as 'sofa surfing'.
3. No one living in emergency accommodation, such as shelters and hostels, without a plan for rapid rehousing into affordable, secure and decent accommodation.	'Shelters and hostels' refer to those which are specifically homelessness provision. Other forms of emergency accommodation include bed and breakfasts, nightly paid temporary accommodation and other forms of short-term housing. It does not refer to the wider group of people in general, temporary accommodation such as statutory homeless people placed in social housing on a short-term basis. The 'plan' refers to real and urgent move-on arrangements from these forms of emergency accommodation, and nobody whose plan for moving on cannot be delivered. 'Affordable, secure and decent' refers to the range of elements that will make for a successful move-on from emergency accommodation.	There will always be a need for emergency accommodation such as hostels and night shelters. But this element of the definition implies a reduced demand for them over time, matched by an increase in permanent housing approaches to address homelessness. It has been difficult to define the concept of successful and rapid move-on. This reflects the problem that there are many people with move-on plans in place who nevertheless remain in emergency accommodation because of other factors. It is not possible to define exactly the length of time to which 'rapid' rehousing refers. This depends on what is appropriate for different people and cohorts of homelessness. It should, however, directly include statutory limits for households in bed and breakfast accommodation, and other such regulations.
4. No one homeless as a result of leaving a state institution such as prison or the care system.	This refers to successful homeless prevention for people who have been the responsibility of the state. This includes previously looked-after children and people who have been released from prison. It should include other groups too – the armed forces, people who have been in NHS care, people who have been the responsibility of the asylum and immigration system.	It is important to note that this is about the transition from state institutions and not about all those who have ever been in care, prison, etc. That transition is the opportunity for successful prevention. It is also important that those who fall within definition 4 could also fall within definition 5. This is because there is over-representation of people who are homeless as a result of leaving care, prison etc. This group should be pulled out separately from the wider 'at immediate risk' groups.
5. Everyone at immediate risk of homelessness gets the help that prevents it happening.	This is restricted to those who are at most acute risk, and require a homelessness prevention intervention.	It is not possible to define every situation where someone might be at immediate risk. But there are reasonable tests of risk that are developed and used, not least in the legal prevention duties for Wales and England. This has a time limit restriction of 'within 56 days'. This element of the definition assumes that the 56-day standard is adopted across Great Britain.

31 No Second Night Out http://www.nosecondnightout.org.uk/



"Football was all I cared about from when I left nursery at four years old... Girls didn't play football back then though so I always had to play with the boys. I could do things with the ball that none of them could do but I had to pretend I wasn't a girl to play against other teams with them...

Afterwards I went to an all girls' school. I started to change personally after that too; being more disruptive and acting up...

Then one day when I was 19 a football scout who had watched me play over the years rang me up and wanted to get me into the England team. I just said I didn't want to play football anymore. Simple as that. I threw it all out the window. It's my biggest regret. But by that time, I'd just stopped seeing football as a real option for me...

Then everything came crumbling down... I thought about suicide. I slept on the streets for two weeks. That's when it was rock bottom for me. I had nowhere to go. My life was an utter mess. Then I ended up in a hostel with 118 other women. A big percentage had been in jail and half of them said the hostel was harder than prison...

Now I've just completed my level one coaching course with the FA and hope to become a professional coach. It's taken me 47 years of struggles, shame and guilt but now I'm finally moving on. I've accepted who I am and I'm the happiest I've been for a long time."

Denise, London

Chapter 4:

Public attitudes and homelessness

The way the homelessness sector and the media communicate about homelessness has a direct impact on public understanding and attitudes towards the problem. This also affects whether the public will demand political change.

The messages the public receive about homelessness reinforce negative stereotypes and drive people further away from believing that ending homelessness is possible. The homelessness sector must change the way it communicates, both directly and through the media.

The stories of homelessness and its impact can be framed and told in ways that will help generate public support for long-term solutions. The evidence of how to better communicate the problem is there – we must use it.

4.1 Introduction

How can we talk about homelessness in a way that deepens public understanding and builds demand for the problem to be solved?

How can we better influence the media to report homelessness as a result of policy choices not life choices?

How can we avoid reinforcing negative stereotypes about homeless people and a sense that homelessness is too hard to solve?

These important questions must be addressed if the long-term solutions to homelessness set out in this plan are to be understood and backed by the public. While it may be possible to achieve political changes without public support, it is harder to do so, and less likely those policies will survive in the long term. It is easier for politicians to make the policy and spending decisions needed to end homelessness if they see public demand for them.

To answer these questions, and provide robust evidence for effectively communicating homelessness, we commissioned a two-year study from the renowned FrameWorks Institute.[1] Unless otherwise stated, all evidence in this chapter is from 'Finding a better frame', the FrameWorks Institute study, conducted across the UK during 2017 and 2018.[2,3]

This chapter details the main themes in public understanding of homelessness. It highlights how these differ from the messages and understanding that those involved in tackling the issue are trying to communicate. The analysis shows why there is a disconnect between the intended messages and how they are received by the public. It then provides evidence of how homelessness must be reframed to redress the problem.

4.2 What messages do experts on homelessness want to communicate?

To understand any gap between the public view of homelessness and the messages that experts on the issue are trying to communicate, FrameWorks first established an 'expert story'. This involved a set of in-depth interviews with leading figures working in homelessness.[4]

The combined and agreed content from these interviews form the 'target' messages that ending homelessness advocates are either directly intending to communicate to the public, or hope are communicated. A summary of the results is set out in the box opposite.

1 Frameworks Institute (2018) *Homepage.* http://www.frameworksinstitute.org/

2 O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom.* Washington: FrameWorks Institute.https://www.crisis.org.uk/media/237700/finding_a_better_frame_2017.pdf

3 Nichols, J., Volmert, A. Busso, D., Gerstein Pineau, M., O'Neil, M and Kendall-Taylor, N (2018) *Reframing homelessness in the United Kingdom: A FrameWorks Message Memo.* Washington: FrameWorks Institute

4 Expert participants in the FrameWorks study came from the following organisations: The Centre for Housing Policy, The Welsh Government, St Basils, Shelter, Shelter Scotland, Shelter Cymru, London Housing Foundation, Heriot-Watt University, Housing First Europe, Housing Justice, Homeless Link, Homeless Action Scotland, Department for Communities and Local Government, Council for the Homeless Northern Ireland, Centrepoint, Cymorth Cymru, St Mungo's.

Homelessness is:

- more than 'rooflessness', it is about the lack of stable, secure and affordable accommodation
- visible and invisible, with many more people hidden from view than those sleeping rough
- inadequately counted by official statistics – more reliable measures of homelessness are needed
- fundamentally linked with poverty.

Those at highest risk of homelessness are:

- young people, black, Asian and minority ethnic groups, LGBT people, migrants, people with disabilities
- people leaving state institutions such as prison or care leavers
- men and women; both are equally at risk, but female homeless people are more hidden.

The causes of homelessness are:

- lack of services to prevent it
- rising housing costs and lack of affordable housing stock
- inadequate welfare assistance
- violence, trauma and adverse childhood experiences
- mental health and addiction problems
- relationship breakdown.

The solutions to homelessness are:

- more affordable, suitable, accessible and permanent housing
- Housing First for homeless people with complex needs
- effective prevention services in local authorities, and across public services
- abolish 'priority need' restrictions for people who are deemed ineligible for rehousing
- cross-departmental strategies to tackle homelessness in each nation.

The expert view from within the homelessness sector is of a multi-faceted and complex issue. Homelessness presents itself in a range of ways, has a complicated range of causal factors, and requires a comprehensive reform agenda for solving it. With this in mind it is easy to see why communicating the issue effectively is problematic.

It is fair to say that no single homelessness organisation or advocate has the ability to control public discourse on the issue. It is also regrettable that to date, the homelessness sector has not coordinated its communication efforts; we have been more likely to compete for media coverage or fundraising attention.

All of these factors affect the messages received by the public.

4.3 What are the challenges we face in communicating about homelessness?

By comparing the expert view of homelessness with that of the general public, FrameWorks identified three major challenges for those seeking to communicate effectively about the issue.

Challenge #1 – A narrow definition of what homelessness is, and who is affected
Through a series of in-depth and also shorter on-the-street interviews, FrameWorks gathered evidence of the patterns of reasoning, assumptions, and understanding of homelessness among the public. Two clear patterns, or cultural models were identified.

The 'homelessness = rough sleeping' model
The public equates homelessness with people living on the streets. It is the absence of having a roof over your head.

This is problematic not only because it misrepresents the full range of homelessness, but also because it blocks understanding of other forms. When participants in the study were introduced to other types of homelessness they challenged whether these were 'real' in the same way.

The 'home as a refuge from a dangerous world' model
According to this model, home is a place of loving relationships, comfort and protection – as opposed to the outside world, which is cold and dangerous. In this model, the home is an essential part of human life needed for our physical and mental health. It is a space that makes ordinary human life possible.

When the combination of the 'homelessness = rough sleeping' model and the 'home as refuge' is active, people express very deep and powerfully negative emotions about homelessness. Homelessness is understood as a state completely outside of, and alien to, normal human existence.

In many ways this is a positive model for those advocating solutions to homelessness, not least because homelessness is so strongly opposed. We also don't have to spend time convincing people that homelessness is a bad thing. However, when combined with the homelessness = rough sleeping model, members of the public associate the powerful negative emotions about homelessness with homeless people themselves. They see them as exclusively rough sleepers. This in turn can lead to stigmatisation and the idea that homeless people are 'other people'.

In addition to the two dominant cultural models, a clear picture emerged of which type of person the public regards as being homeless. FrameWorks researchers emphasised the strength of these findings.

"Across all of the social issues on which FrameWorks has conducted research, we have not identified prototypes that so powerfully shape subsequent thinking about that issue as we have during the course of our research on homelessness."

Prototype 1: The middle-aged man
By far the most dominant prototype, the middle-aged man is between the ages of 40 and 60 and has been sleeping rough for an extended period of time. He is assumed to have serious mental health and addiction problems. As one research participant put it:

"Some people might have mental health problems and never be able to have what is normal to society. They will always be at the fringe or they are at the fringe and nobody is looking out for them and then they end up homeless."

The middle-aged man is cognitively linked with the models that blame homeless people for their situation, and with fatalism about the possibility of ending homelessness for individuals or society.

Prototype 2: Young and homeless
This is a young person who has been kicked out by their family and is living on the streets. The person could be male or female and is assumed to be living on the streets because of some dysfunction in the family home.

This activates individualistic thinking about families and makes it difficult to see any structural reasons why young people might be homeless. As one participant put it:

"I think about the children who get sexually abused and run away. You know? Maybe from a stepfather, or mum's boyfriend, or whoever. And they run away. And then they've nowhere to go and end up just living on the streets."

Prototype 3: Abused women
Similar to the young and homeless idea, this is about women who have left a domestic setting with no other choice than to sleep rough.

"Say you come from a family and you decided to leave that relationship because it's so septic, but you go to a woman's refuge. It's a home for now, but it's not a home, just somewhere safe."

These dominant prototypes raise a number of problems for the homelessness sector. First, while they include some elements of truth, they also exclude wider understanding of other homeless people, of different forms of homelessness. Also, with these mental images it is hard to see it as a widespread social issue.

With such strong images of who homeless people are, it is very difficult for the public to understand or empathise with those affected unless they themselves have experienced something similar. Furthermore, such a narrow view of homelessness associated with personal choices can lead to feelings of antipathy or blame being directed at homeless people.

Challenge #2 – People see homelessness through the lens of individualism

As we saw above, experts working in homelessness view the problem as fundamentally caused by structural policy choices. These include housing and welfare policies, and the way in which public services prevent or respond to homelessness when it occurs. Even where personal factors can lead to a risk of homelessness, advocates, including ourselves, strongly believe that with the right public policy responses it is not inevitable. Indeed, many of those risk factors are themselves a result of policy failings. FrameWorks has demonstrated that public opinion on these issues diverges sharply from that of the homelessness sector. Homelessness is understood by the public to be a private issue affecting individuals and their families.

There are a number of cultural models identified by the research that explain this divergence.

The 'individualism' model
Individualism is an overarching cultural model which powerfully affects public thinking. It shapes how people perceive the causes and consequences of homelessness, and a range of other social problems. In this model, people see the causes of large-scale social problems such as poverty, crime and homelessness through a lens that looks at individual characters and situations. However, the broader social context is hidden from view.

Consequently, people blame problems on 'bad' people who make poor choices, or dysfunctional families with deficient values. Individualism obscures systemic and structural factors that cause or contribute to social problems. These can include a lack of access to affordable housing, quality education, or other resources, and national policies affecting employment. Homelessness, through this logic, is a personal affliction rather than a social problem.

This is supported by other studies of public opinion. For example, recent Ipsos Mori public polling for The Salvation Army found that people view the main reasons for homelessness as individual choices and circumstances. Reasons given included addiction to drugs and alcohol, or personal debt.[5]

5 Ipsos Mori (2015) *Perceptions of Homelessness.* https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Homelessness-perception-topline-feb-2015.pdf

The strength of the individualism model is directly tied to people's prototypes of homelessness. Because prototypical images of individuals structure thinking about homelessness, thinking about the issue begins – and often stops – at the individual level.

Individualism blinds people to the reality of what causes homelessness, and limits public understanding and involvement with the issue. This can diminish its importance and therefore any chance that people will support strategies for tackling the problem.

The 'self-makingness' model
The self-makingness cultural model is the widely shared and frequently applied belief that individuals make their own fates and determine their own destinies. According to this model, everyone has the opportunity to achieve success; people who experience homelessness or other hardships have simply failed to work hard and seize those opportunities.

When thinking in this way, people attribute success or failure to whether a person has tried hard enough or not. People are homeless because they 'choose' behaviours that lead to the loss of housing.

Members of the public, for example, often list addiction as a factor that can lead to homelessness, especially when thinking about the middle-aged man prototype. But they understand addiction as a choice. People choose to drink alcohol, smoke cigarettes, take drugs or gamble despite the risks inherent in these activities. In this way, addiction is a series of bad personal choices that lead to homelessness.

As with individualism, this model restricts the public's understanding and appetite for wider solutions to homelessness.

The 'rational actor' model
People think about homelessness through another specific model of behaviour, also rooted in the individualism model. According to this model, many homeless people have made a deliberate decision that being homeless is better than conforming to the norms, responsibilities and expectations of society.

So homelessness is a decision made by an individual to avoid the costs of family life, participation in the job market or social responsibilities. Homelessness is a conscious and affirmative choice to live without shelter. As one research participant put it:

"It can be a choice. People can decide to make themselves homeless and to seek a more free approach to life."

If homelessness can be viewed as a lifestyle choice in this way, it can lead to the view that people must be dissuaded from their decision to live on the streets, and even criminalised for doing so. This is a pernicious cultural model that takes public opinion very far from the intention of many homelessness sector advocates when communicating their issue.

The already available model
The public also assumes that the services necessary to support those who are homeless are readily available and easily accessible. The problem, people reason, is not that services don't exist, but that homeless people are either unaware of or unwilling to use them.

"Say for example, if it's a condition of the hostel that you don't take drugs on the premises and you don't come into it intoxicated, there are people that will fulfil those rules and there are people that won't have the mental strength to fulfil those roles. In each case, they would just be wandering around on the streets, probably get arrested every now and again."

The charity model
This model is also part of the individualism model. When applying it, the public assumes that individual acts of kindness and charity towards people in crisis are effective and sufficient in addressing homelessness.

The obvious drawback is that if one-off charitable acts are seen as sufficient, then people's appetite for tackling structural causes, or advocating prevention measures, are seriously inhibited.

Each of these individualistic cultural models is problematic when they evoke public responses to homelessness. They make it less likely that people will recognise or consider systemic causes or solutions to the problem.

Challenge #3 – Prevention is poorly understood by the public

Experts in the homelessness sector agree that steps can be taken to prevent homelessness, and call for bold action in this area. In our political work, the sector regularly calls for preventative policies, including:

- lower rents and longer tenancies to stabilise costs and make the private rental market more stable, and to prevent evictions
- building more high-quality social housing and ensuring empty homes are used to provide affordable housing accessible to those in need
- better training for social services, doctors, teachers and others to recognise people at risk of homelessness, and to refer them for early interventions. These could include assistance with housing and non-housing services such as employment advice, mental health services and family mediation.

This focus on prevention is a critical disjuncture between the sector and public understandings of homelessness. The public lacks a robust understanding of the concept of prevention, and the subject is largely absent from public discussion. So it is not surprising that people do not see prevention as a viable social policy.

The dominant cultural models and prototypes of homeless people prevent people from thinking about prevention of homelessness in systemic terms. Working within the individualism models above, people can think about how individual actions can prevent homelessness – making better choices, for example. But they do not see how politicians can make better policies to increase access to stable, affordable housing.

When people think of ways of preventing homelessness they do not think of broader economic policies or solutions, such as ensuring a strong benefits system or stable jobs with good wages. Recent FrameWorks research on poverty in the UK found that the public does think of such measures as solutions to poverty[6], but sadly not in relation to homelessness. This is because the public sees homelessness and poverty as distinct issues.

6 Volmert, A,. Gerstein Pineau, M. and Kendall-Taylor, N. (2016) *Talking about Poverty How Experts and the Public Understand Poverty in the United Kingdom*. Washington: Frameworks Institute http://frameworksinstitute.org/assets/files/PDF/JRF_UK_Poverty_MTG_2016.pdf

The 'crisis intervention' model
The public's difficulty in thinking about prevention is reinforced by this dominant model of solutions. Research participants equated addressing homelessness with intervening to help people in moments of crisis, such as when women who have been abused find themselves on the streets. This typically involves finding people shelter. Because homelessness becomes visible when people are on the streets, the public only thinks of short-term crisis solutions to homelessness.

This model impedes thinking about systemic steps to prevent homelessness. Considering prevention is difficult. This is because people lack a way of thinking about homelessness that includes any parts of the spectrum other than rough sleeping. They see interventions and solutions in remedial terms.

FrameWorks is clear that considerable work is needed to explain the causes of homelessness 'such that people can see the potential power of intervening early or pre-emptively, and imagine ways of doing so, to avoid problems and create better outcomes.'

Challenge #4 – Fatalism about homelessness limits support for solutions

The final challenge identified by FrameWorks is the issue of fatalism, or the idea that the public see homelessness as inevitable and unsolvable. They identified a set of inter-relating cultural models relating to fatalism.

The 'bad break' model
This is the idea that homelessness via bad luck can strike at any time, and it is unpredictable. Quite apart from having any link to social structures or predictable impact of policies, homelessness is simply what happens when people experience something like sudden job loss. As one research participant explained when asked what causes homelessness:

"Some guy's unlucky and his wife kicked him out. Freezes all the accounts, blah, blah, blah."

This model leads the public to assume that some degree of homelessness is inevitable – bad breaks are bound to happen – and to doubt that policies or programmes can do anything to prevent it. This poses a challenge to the sector in communicating homelessness: to demonstrate how and when it can be predicted, and to identify consistent causal links. Without this, when the 'bad break' model is evoked, it is unlikely the public will engage in solutions.

The 'modern life is hard' model
This is a cultural model that leads people to conclude that modern life sets people up for financial struggle and instability. This assumes that modern life has seen a breakdown of traditional community relationships and social support, while also putting pressure on people to achieve a certain lifestyle.

Homelessness occurs when people who are unable or unwilling to achieve this lifestyle 'fall through the cracks' of society, because they have no family or community to depend on during hard times. Importantly, the public thinks of this dissolution of support mechanisms as permanent and irreversible.

"I became homeless last year due to domestic violence, and I've been living in the hostel for 13 months now. I'd like to have my own place because I have a daughter. She's five, but I don't have enough contact with her at the moment. The hostel I'm in isn't suitable for her, which is very stressful. I'm on a waiting list with the council to move and hopefully it will be soon. But I think I'll just be going into another hostel because the council don't really help single people to find permanent accommodation...

I'm trying to get on with my life, but it's been very hard. I'd really love to go to college and get back into education, but if I do they might stop my benefits because it's only supposed to be helping you look for work. Really, I'd just like to have my daughter back in my life. That's my only wish."

Sarah
(Not her real name)

While this model allows people to view homelessness within a frame of causal links, it is again a fatalistic approach. The model is closely tied to a malaise about modernity and the loss of a more caring and socially responsible time. Because of this, FrameWorks recommends that 'communicators must be careful about employing nostalgic language, as this is likely to trigger the model and lead people to yearn for a past that they perceive to be irretrievable.'

The 'vicious cycle' model
This is the idea that people who experience homelessness are trapped in a downward spiral from which they are unlikely to recover, and is especially active when thinking about the prototype of the rough sleeping middle-aged man.

The vicious cycle model assumes that problems like addiction and mental illness are exacerbated by living on the streets and make it difficult for middle-aged men to escape homelessness. Like experts, members of the public recognise that the causes and effects of homelessness, such as addiction, are intertwined and reinforce each other. However, among the public this leads to a strong sense of fatalism about addressing homelessness. Members of the public assume people are permanently damaged by their experiences of homelessness. They assume that 'damage done is damage done', and that anyone who experiences homelessness for a significant time will be unable to reintegrate into mainstream society. As one research participant put it:

"I know somebody who is a chronic alcoholic and he really wants to get off the street and wants to go to a clinic. He can't go to one because he is not without drink for long enough that they will pay for him to go. But he also knows he's going to die."

If this model is active in the public understanding of homelessness, then the idea of solutions to homelessness is pointless. The cycle is unbreakable, so why try?

The 'game is rigged' model
The final fatalistic model identified by FrameWorks is about the idea that there will always be homelessness because elites at the top of society will never see solving it as within their interests. Furthermore, when this model is active in public thinking, people believe that these elites actively manipulate the economy and government to get what they want.

FrameWorks has found that this model is deeply embedded across a range of issues in the UK, and that it consistently leads to fatalism about solving problems. This is even when people can identify possible solutions.

The model undermines the role of public policy and of campaigning, as people are cynical about what will ever be achieved against the will of powerful elites. This means that finding ways to 'tune out' this model are vital. Instead we must find evidence-based ways to communicate the value and potential of collective action and positive political choices.

Example of a former fundraising appeal, image no longer in use.

4.4 Why do the public think this way?

There are a set of fundamental differences between the expert view of homelessness and their intentions in communicating the issue, and the ways the public understands and processes their thoughts on it.

To understand why these differences occur, FrameWorks studied a sample of 333 charity and media materials about homelessness that appeared between October 2014 and October 2016.[7] The results demonstrate why the cultural models and prototypes are activated in people's minds. Evidence of the way in which media and homelessness sector communications have influenced public understanding is presented below, using the four challenges explored above.

Challenge #1 – A narrow definition of what homelessness is, and who it affects

The limited definitions that structure public thinking about homelessness are consistently used in the media and in homelessness sector materials.

Rough sleeping is by far the most frequently discussed type of homelessness. Thirty-five per cent of the sector materials reviewed discussed rough sleeping, 14 per cent discussed sofa surfing and six per cent discussed squatting. The media is even more likely to discuss rough sleeping. Almost half (48%) of the news stories analysed discussed rough sleeping, while only 11 per cent discussed sofa surfing and fewer than five per cent discussed squatting. Furthermore, the middle-aged man prototype is a dominant image of homelessness in media and sector materials.

"From a very young age I was in and out of care, and this was really difficult for me, as I was bullied badly there. From the age of nine I slept rough, mostly in shop doorways and sometimes in a lift in a car park until I got caught. Whilst sleeping rough I met two men who were homeless, and they became my friends. Unfortunately, this is when I started to drink and then later take drugs, glue and solvents mainly. This went on throughout most of my life. I had to shoplift to support my habit and to be able to eat, and I quickly became very streetwise, because this was my only way to survive." [8]

As above, these materials typically include some description of the individual's fall into homelessness that references struggling with mental health issues, substance misuse or crime.

Stories from the sector typically also include some element of redemption. This is where the person who sleeps rough seeks and receives help (usually from the charity in question), and is able to turn his life around and live a 'normal' and productive life. FrameWorks also points out our tendency to detail tragic endings, such as homeless men who struggled with addiction and died while living on the streets.

As communicators about homelessness, the sector is seen to offer a constant stream of limited stories about what homelessness is and who it affects. And as FrameWorks says, this 'ultimately creates a vicious cognitive cycle: members of the public

7 O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom*. Washington: FrameWorks Institute. https://www.crisis.org.uk/media/237700/finding_a_better_frame_2017.pdf

8 O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom*. Washington: FrameWorks Institute.https://www.crisis.org.uk/media/237700/finding_a_better_frame_2017.pdf

Table 4.1: Absences in media and third sector organisations' materials

Narrative component	Percentage of sector materials	Percentage of media materials
No values statement	62.7	86
No systemic cause mentioned	54.7	51.7
No societal consequence mentioned	69.6	74.4

have existing negative and inaccurate images of homeless people; they encounter these images when they read the news, watch television or open their internet browsers, and this experience substantiates their understanding of who is homeless and where homelessness occurs. This cycle drives these cultural models and prototypes deeper and deeper into thinking with each exposure.'

These stories also trigger individualistic thinking about how people lapse into homelessness (for example, through drug and alcohol addiction). This then raises unproductive questions about whether this person (or any homeless person) is worthy of help from society.

The research shows how these kinds of stories – and the cultural models they reinforce – constrain people's ability to see and support systemic solutions for homelessness. The media and sector communications rarely explain how social conditions, rather than personal circumstances, place people at higher risk of experiencing homelessness. For example, the case study on the previous page does not link the inadequate care system to the increased likelihood of experiencing homelessness. It also lacks discussion of how family housing services address problems like mental health issues, substance misuse or financial distress.

Challenge #2 – People see homelessness through the lens of individualism

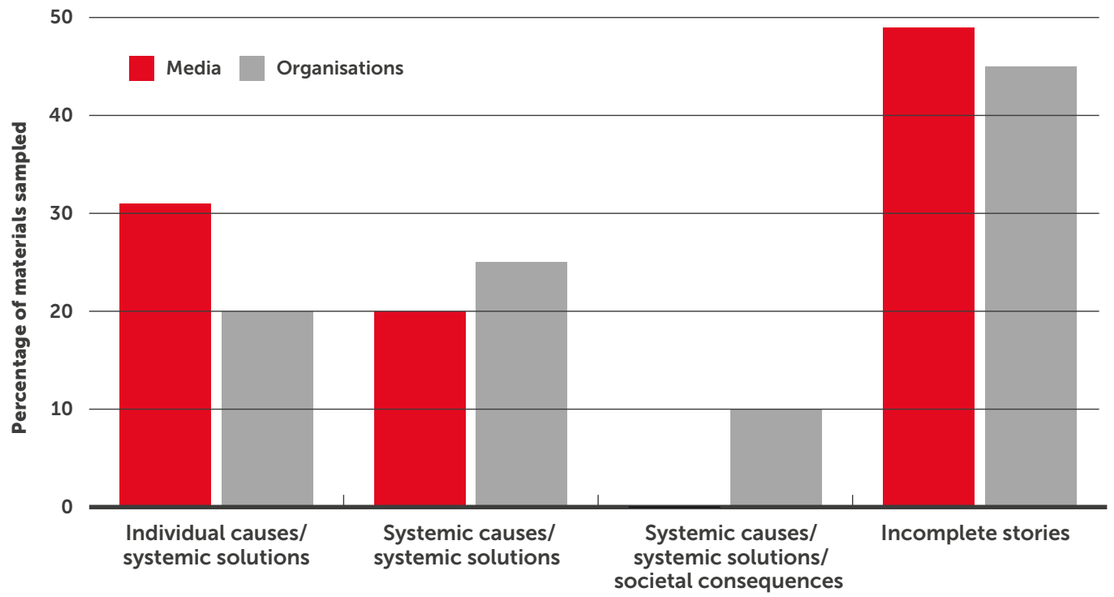
Analysis of media and sector materials shows that individualistic framing of homelessness is dominant, but also that this cultural model faces no opposition. So, we not only tell stories reinforcing individual choice as a primary force in homelessness, we also fail to describe the systemic causes of the problem or its consequences for society.

Key absences in media and sector discourse

As table 4.1 shows both media and sector materials tend to leave out discussions of the social causes and consequences of homelessness, as well as systems-level solutions to the issue. This is particularly true among media materials. More than half of the media sample (51.7%) did not mention any systemic cause of homelessness, and nearly three-quarters (74.4%) made no mention of any of its societal consequences. Finally, 86 per cent of media articles did not include any explicit arguments – what FrameWorks calls 'values statements' – about why addressing homelessness is a matter of collective concern.

These absences are similarly missing from our own sector materials. Nearly two-thirds (62.7%) of these lacked values statements communicating why public action is necessary to address homelessness. And almost 70 per cent lacked any discussion of the societal consequences of homelessness.

Figure 4.1: Narrative types in media and third-sector materials



Source: FrameWorks Institute 2017

Without robust discussions of the societal impacts of homelessness, the public will not be able to see how the negative consequences are felt beyond those who are currently homeless. This lack of a social frame dramatically limits people's understanding of, and involvement with, the issue and reduces their demand for solutions.

Media and sector narratives

In addition to these holes in the media and third sector stories, FrameWorks identified a set of narratives in media and sector materials. Figure 4.1 shows the prevalence of these narratives and therefore the power they are likely to have in shaping people's thinking about homelessness.

Narratives that cue individualism

The individual cause/systemic solutions narrative is present in both media and sector materials. Thirty-one per cent of media materials and 20 per cent of sector materials tell this story, which has a predictable and consistent form across these materials. First these stories zoom in on a homeless individual and describe their living conditions. Then they describe the individual-level circumstances (such as substance misuse) that led to the person's loss of stable and secure housing. Finally, they advocate for more direct services or policy change to help the individual find stable housing. The passage overleaf, a message from the sector, exemplifies this narrative type.

"Paul previously lived and worked legally in the UK for many years, but for the past 14 years he has been a visa over-stayer. He has had one application and two appeals to stay in the UK on human rights grounds turned down. Paul does not want to return to his country because there is nothing for him there – his family are all in the UK. He has not accepted the offer of being returned voluntarily... Paul is 70 and destitute. He has deteriorating chronic health problems that have led him to be in hospital four times in the last two years. After one ITU (Intensive Therapy Unit) stay (for ketoacidosis), he was turned down by four GP practices, as he lacked a residential address, or adequate ID. Fortunately a mainstream practice well known for supporting homeless clients did eventually register him. [...] At the conference, we will be discussing how we can best help Paul. Should the Home Office take responsibility for people like Paul who have multiple health needs? What is the role of health care professionals? Where is the safety net?"

Given the strength of the individualism cultural model, it is easy to predict the public's response to this article and others that use this narrative structure. The communicator clearly aims to build public support for solutions to homelessness, but members of the public are likely to get stuck on the details of Paul's story. Why did he make the poor decision to overstay his visa? Are his health problems a result of bad personal choices? Are they perhaps related to his decision to use alcohol or drugs? Why did he make those choices?

When communicators tell individual stories like Paul's, they unintentionally prompt audiences to question whether the individuals profiled actually deserve public assistance. In so doing, they run the risk that audiences will answer this question with a resounding 'no'. Interpreting this example through the lens of individualism, people will likely conclude that Paul did not live up to his responsibilities and does not deserve support through a stronger safety net.

This narrative type is not all bad. It gives the public information about solutions that go beyond individual willpower or drive. These stories challenge people's sense that more motivation and better decisions are the only or best solutions to homelessness issues. But because these narratives do not link systemic solutions to systems-level causes, they are ultimately unable to counter individualism. They leave space for people to fill with their dominant individual explanations of the causes of homelessness.

The incomplete story narrative was the most common type in both media and sector materials, appearing in nearly half of all articles (45% and 49% respectively). Messages falling into the incomplete story category fail to answer essential narrative questions like: why does homelessness happen?; what are its consequences?; and what should we do about it?

These articles tend to be short pieces on websites or blogs that provide mission statements, announce events, describe organisational activities or depict statistical information through the use of infographics. The piece overleaf represents these kinds of stories.

"Forty cyclists will use peddle power to fight homelessness in a fundraiser for a large homelessness organisation this weekend. It's the third year of the Borders cycle challenge, which will set off from Kelso racecourse at 7am on Sunday morning. The hardiest of the riders will take on a gruelling 100-mile tour, which includes an ascent of almost 2,000 metres. For less experienced riders, a shorter race cuts out some of the hardest climbs, and everyone will get to enjoy some of Scotland and northern England's best scenery as they cycle through Border towns including Duns, Eyemouth and Coldstream. Both routes will finish back at the racecourse. The organisation's director said: 'I am in awe of the cyclists who are taking on this challenge to help us ensure no one battles bad housing or homelessness alone. I'd like to wish them all the best for the event and give them my heart-felt thanks'."

FrameWorks points out that while people working to address homelessness may not think of event announcements like this one as framing opportunities, even short communications are valuable opportunities. Communicators should strive to always consider framing and take advantage of every opportunity to tell systems-level stories that counter individualism in public thinking.

To ensure homelessness is seen as a social issue rather than a personal problem, we must find ways to expand public understanding. It must move beyond individualism, which is a deep, pervasive and well-established cultural model.

Reframing efforts must avoid reinforcing a narrow focus on individual choice and willpower. A frame must be developed based on using stories, causes and solutions that expose the public to the full spectrum of factors that make people more or less likely to experience homelessness. An effective frame must also help people see that the consequences of homelessness are shared across society – and not limited to individuals who are currently homeless.

Systems narratives

While the first two stories discussed above are problematic in advancing public engagement with homelessness, the FrameWorks research identified two more promising story types. These systems stories more closely align with expert understandings of homelessness. They are good starting points for integrating systemic thinking into popular discourse. Unfortunately, these types of stories do not appear frequently; only 20 per cent of the media materials and 35 per cent of the sector materials could be categorised as systems stories.

The system causes/systems solutions narrative was present in both the media and third sector materials (25 and 20 per cent respectively). The following passages are good examples of this story type.

'Christmas is a mere one week away, so what timely gift should you panic-buy the politics and economics enthusiasts (yes, they exist) in your life? Fret no more: I've come up with the ideal present – a Build Your Own Housing Crisis kit. In the box provided, you'll find a city with rapidly growing research and medical industries; a large student population; a scarcity of unoccupied land to build on; a desperate homelessness problem; massive central government cuts to scupper planned house-building; and a green-belt encircling the city, strangling any hopes of expansion. Once you've followed the instructions, you may be surprised to learn you've built your very own Oxford, rather than London. The city is now the most unaffordable in the UK, with rents and house prices relative to earnings higher than even the overheating markets of the capital.'

"Whenever our staff support or visit families living in these conditions we witness the terrible toll it is having on their children – damaging their ability to learn and longer term life chances as they witness things they shouldn't, struggle to sleep, maintain their self-esteem, and lack the space to study and play."

Both examples demonstrate that rates of homelessness are directly related to rising housing costs; other parts of these pieces also briefly point to actions that might have prevented the housing crisis. However, these examples are missing discussions of the societal consequences of homelessness – an absence that characterises the systemic causes/systemic solutions narrative type more generally.

Without explicit connections to societal (rather than individual) impacts, we risk evoking the charity model and the responses it brings to mind. If the impacts of homelessness are only felt by individuals, members of the public may feel inclined to help vulnerable people and others deemed worthy. However, they are unlikely to engage with the policy-level changes important in preventing homelessness. They may also be likely to fall back on punitive approaches to addressing homelessness if the potential recipient of assistance is categorised as undeserving of help.

The general structure of the media's systemic causes/systemic solutions story is that rising housing costs result in increased homelessness, and regulating housing costs is the most effective way to address homelessness. This is a critical first step in expanding the public discourse and popular thinking about the systemic causes of homelessness. However, it shows that the public lacks access to media stories explaining the relationship between poverty and homelessness – a connection they already struggle to see.

Finally, sector materials include a complete systemic causes/systemic solutions/societal consequences narrative. These stories also incorporate discussion of impacts that go beyond individual homeless people and their immediate families. This is a complete social change story about homelessness – but it was only present in ten per cent of the sample analysed by FrameWorks, and is completely absent from the media. The following excerpt exemplified this type of story.

'With cuts to public services, restrictions on welfare, rising housing costs and a lack of housing supply, there are real fears that homelessness will rise further. Women are likely to be particularly affected by the impact of welfare changes as they are more likely to be dependent on benefit income, including housing benefit. The concern is that we now face a 'timebomb' of women's homelessness. As homelessness rises, funding for support services is being cut. Overall, homelessness services reported a 17 per cent reduction in funding in 2013, with the proportion targeted at women falling from 12 per cent to only eight per cent in the last two years. This is very concerning considering women make up a quarter of people using homelessness services. The costs of women's homelessness can be devastating for women and their families. These high costs are also felt by the wide range of support services which women come into contact with during their experiences of homelessness.'

This example focuses on conditions that lead to homelessness. Unlike the individual causes/systemic solutions narrative, this approach does not link homelessness to an individual's decisions.

To shift unproductive public narratives, the sector must tell new, more productive stories about homelessness. These stories should, at all costs, break out of the individual frame and make the societal consequences of inaction clear.

Challenge #3 – Prevention is poorly understood by the public

Analysis of the media and homelessness sector frames helps explain the public's difficulty in engaging with the idea of prevention. Only 7.6 per cent of media articles and 24.2 per cent of sector materials dealt with the idea of homelessness prevention. Of the sector materials that addressed prevention, many asserted its importance, but very few explained how preventive approaches would work to address homelessness.

Sector agencies adopted one of two strategies in their prevention-focused materials. The first was to simply include the word 'prevention' without defining its meaning.

The second tendency was to describe prevention by stating determinants ('if we do X') and outcomes ('we will prevent Y from happening'). These discussions exclude the processes or explanation of how such prevention is possible, or how it works in practice.

"I was particularly pleased by the announcement this week that that every £1 spent on services in Northern Ireland saves £1.90 for the public purse. This news holds powerful significance for the similar programmes in Wales – particularly when we ask ourselves how we can continue to campaign for the continued ringfencing – (and increased protection) – of this vital funding stream. Commissioned by Northern Ireland Council for Voluntary Action (NICVA), the report demonstrates that significant savings are delivered through the programme's focus on prevention and reducing the need for statutory services such as health, social care and the criminal justice system."

"We got talking online, and then arranged to meet in Oxford where she lived. We sat in a café and talked for a long time. We held hands, and we realised that we were indeed father and daughter.

She was 34 years old, and she told me that she'd been looking for me for years. I had no idea. She'd even contacted *The Jeremy Kyle show* to try and find me. But because I've been off and on the streets for so long, and my working life has been all over the country no one had been able to...

We've kept in contact ever since. I know it's not been a proper father-daughter relationship because of my non-existence for so long, but we get on great together, and we see each other whenever we can...

If it hadn't been for social media I would never have found out about my daughter, and ever since then it's been a big part of my life. I want to help people, and when I'm online I feel like I can help to highlight issues about homelessness."

John, London

The excerpt on the previous page states that focusing on prevention will reduce dependence on the need for statutory services. However, it does not include any information about how the programme's services result in these savings.

The lack of explanation of preventative approaches is not restricted to the issue of homelessness. FrameWorks research has found that difficulty communicating about prevention affects many other issues – from early childhood to addiction and climate change to justice reform. The homelessness sector should not take for granted that members of the public understand what prevention means and how it works in homelessness issues.

Challenge #4 – Fatalism about homelessness limits support for solutions

The patterns of media and sector coverage substantiate and contribute to fatalistic thinking. Many media and sector materials do not list any solution at all, whether individual or structural. Almost one third of media materials surveyed did not offer any solutions to homelessness, and 17 per cent of sector materials did not provide readers with a solution.

Another way in which communicators support the public's fatalism is through crisis messaging. Such stories focus on the prevalence of homelessness, without including solutions that match the scope of the problem presented. In the following passage, this framing becomes apparent in the imbalance between the proportion of the story that focuses on the problem versus the proportion that discusses solutions.

'The fact that there will be 626 more homeless children in Scotland this Christmas than last year – a 15 per cent increase – is simply not good enough and a badge of shame for such a relatively wealthy country. Our winter appeal aims to raise awareness of the plight of homeless children who will spend this Christmas living in temporary accommodation. The increased number of homeless children indicates a growing bottleneck of families stuck in temporary accommodation due to the major shortage of affordable housing across Scotland. We are calling on all of Scotland's political parties to include ambitious targets for new affordable housing in their manifestos for next year's Holyrood election campaigns and bring hope to the 150,000 families and individuals stuck on council waiting lists across the country.'

When organisations and the media discuss the prevalence of homelessness or emphasise its urgency without offering solutions, they substantiate the public's fatalism about the issue. They allow the public to fall back on the fatalistic sense that homelessness is an unavoidable problem.

The sector needs strategies to elevate public awareness and understanding to build support for the reforms needed to ensure stable housing for all people in Great Britain. The strategies must focus on ensuring that people understand that homelessness happens because of policies and practices and can be prevented by redesigning them.

4.5 What can be done to change the way the sector and media communicate?

FrameWorks developed and tested a series of communications approaches designed to move public understanding of homelessness into more productive territory and increase support for policy solutions.

To directly address the challenges discussed above, the strategies were designed to:

- expand the public's definition of homelessness beyond rough sleeping
- build public understanding of the underlying social causes of homelessness
- help people see that homelessness can be prevented and effectively addressed by tackling its structural causes.

Given the importance of public voice and action in support of policy change, communications were also tested for:

- their ability to generate a sense of collective responsibility for tackling homelessness
- their likelihood of galvanising people to support specific policies
- inspiring action (such as volunteering, donating money or getting involved in campaigns).

FrameWorks worked with homelessness organisations to develop a set of messages, and then tested them with the UK public. First they conducted a series of on-the-street interviews with 51 people. These were then followed by a series of surveys with a nationally representative sample of 9,900 respondents. The objective was to robustly test the effectiveness of a variety of frames on understanding, attitudes and support.

The research strongly identified a 'common experience' frame as the most effective strategy for changing public perceptions. A combination of messages, values and stories make up this frame and together they do three important jobs.

First, they highlight our fundamental commonalities – showing that homeless people are human beings and members of society, and not somehow 'other'. Second, they communicate the experience of what it is like to be homeless. And third, they explain how homelessness happens and how systemic solutions can help.

The frame combines the following elements. It is crucial that these are used in combination with each other. This is because using one element alone will not be effective and may undermine the attempt to reframe the issue.

Element #1: Values
By tapping into shared values and beliefs, communications can encourage the public to engage with policy-based solutions. These can be especially powerful when used at the start of a piece of communication. They help to anchor the audience with an understanding of why an issue matters.

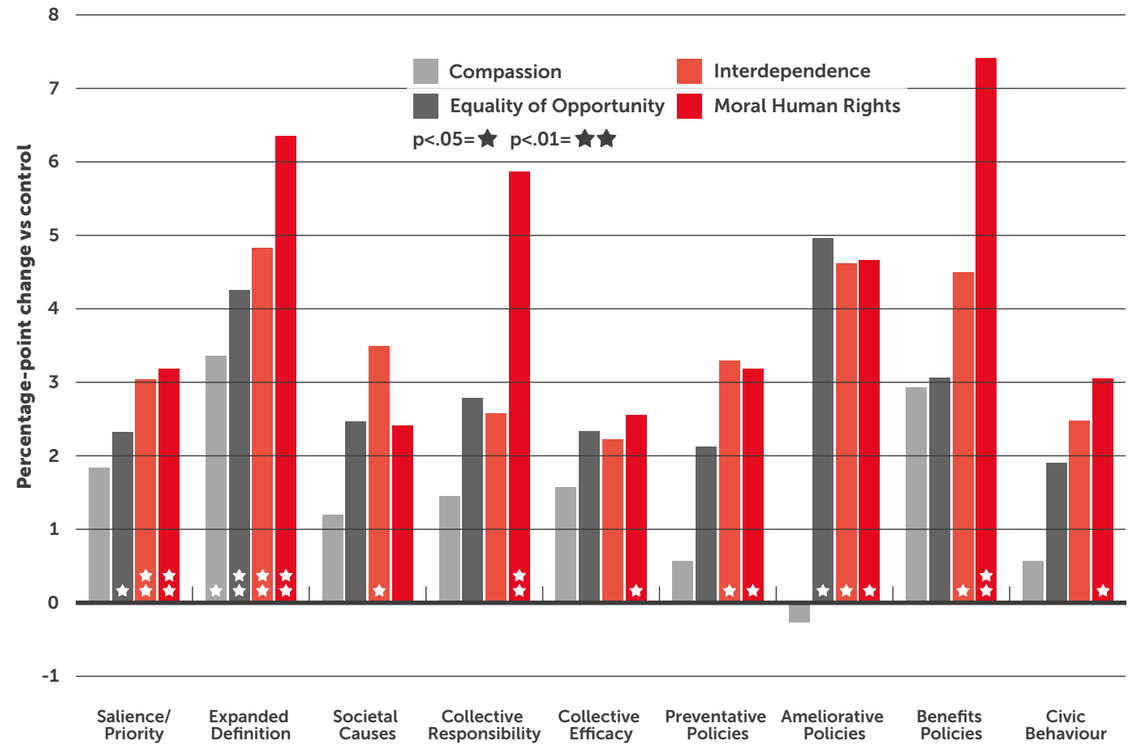
FrameWorks identified two values as particularly effective in increasing public support for collective action on homelessness. Both appeal to our shared humanity and connections as members of society, and so make it more difficult for the public to think of homeless people as 'other' or different.

Moral human rights
This value is based on the idea that we all have the moral right to dignity and respect as part of our basic humanity.

'Everyone has the right to be treated with dignity. Among other things, living with dignity means having access to decent housing. Let's commit to protecting this essential human need. Right now, hundreds of thousands of people in this country are homeless – forced to sleep on friends' sofas and floors, live in crowded or unsafe places, or even stay out on the streets. We can do better.'

As figure 4.2 shows, the research found that activating this value has a strong, statistically significant effect. It encourages people's support for policies that strengthen welfare benefits to prevent and address homelessness. It also encourages them to recognise homelessness as a salient issue and expands the understanding of homelessness (beyond rough sleeping). Additionally, this value draws out a belief in collective responsibility and efficacy, and inspires a willingness to take action to address homelessness. By appealing to a sense of shared humanity, it increases people's sense of responsibility for tackling homelessness and dislodges the tendency to see homeless people as 'other'.

Figure 4.2: Effects of Values



Source:FrameWorks Institute 2018

The researchers noted the strength of the effects of this value compared to similar experiments on other values and issues. They found it was equally powerful among voters from across the political spectrum.

It is important to note that this value is not about legal rights, but about showing how homelessness violates our moral responsibility to treat all human beings with decency.

Interdependence
The value of interdependence highlights the connections and inter-reliance amongst everyone in society, and in doing so, it helps people to see the social causes and consequences of homelessness (see figure 4.2).

'What affects one of us affects all of us. When some people are struggling, it hurts everyone. Right now, many people are homeless or at risk of becoming homeless, which makes it harder to contribute to and share in our country's prosperity. Making sure that everyone has safe, stable housing benefits us all by creating a stronger, more productive society where everyone can contribute and we all benefit.'

Triggering this value had significant effects on recognition of the issue as salient. It expanded understanding of homelessness and support for the range of policy areas tested. Importantly, it was the only value that increased people's understanding of the systemic causes of homelessness. The value reminds people that we are interconnected both socially and economically, and that addressing homelessness strengthens society as a whole.

Organisations communicating with the public about homelessness must take care not to confuse shared humanity or interdependence values with a message that 'homelessness can happen to anyone'. This message, inherent in claims such as 'we're all only three pay cheques away from homelessness', attempts to connect the public with the issue and create empathy and concern.

However, when tested by FrameWorks, it failed to positively shift any of the attitudes measured. This could be because it triggers fatalism rather than optimism, or because it doesn't ring true. People's experience tells them that some people are not at real risk of becoming homeless, because they have the resources and support structures that would prevent this from happening.

Element #2: Explanatory strategies
The research also identified effective communications devices for explaining the social causes of, and solutions to, homelessness, and for helping people understand how homelessness and housing insecurity feels. The strategies provide a vivid mental picture of how homelessness works and they enable people to see beyond individuals, to systems.

The 'constant pressure' metaphor
Metaphors are effective in explaining complex social issues. They compare complicated concepts with more familiar ones, making them easier to understand, remember, and in turn pass on to others.

One metaphor, 'constant pressure', proved highly effective at shifting how people think about homelessness.

'Poverty puts pressure on people, like water pushing against a dam – it's constant and strong. If the pressure builds up, the dam can break and people can be pushed into homelessness – sleeping on friends' sofas and floors, living in crowded or unsafe places, sleeping on buses or in cars, or even being out on the street.

The pressure comes from high housing costs, low wages, and inadequate government support, building up, until it's close to a breaking point. A sudden increase in pressure from a life event – like losing a job, a relationship breakdown, or a health crisis – can quickly become a rushing flood that pushes people into homelessness.'

This metaphor works by enabling people to see the external forces that affect someone's ability to retain secure, stable housing. It also highlights the compounding effects of factors such as low wages and insufficient benefits. It helps to steer people away from the assumption that 'people make their own choices and lot in life.'

By using a vivid image of water pressure, it helps people to understand what it might feel like to live under such constant pressure. By encouraging people to put themselves in the place of someone experiencing this situation, it helps overcome the tendency to see homeless people as 'other'.

Experiential stories
Stories which describe the lived experience of homelessness can powerfully engage people in the issue. They make it accessible and generate concern.

As we have seen in the first stage of the research described above, the sector has typically relied on a fairly narrow set of stories. These predominantly focus on rough sleeping and individual causes, consequences and solutions.

The research showed that these types of stories can be effective in increasing people's sense of the importance of the issue and even in improving their support for policy solutions. However, it is vital that communicators tell a wider range of stories about homelessness to expand public understanding of what homelessness is. These could include, for example, stories about people forced to move between other people's sofas; people sleeping in their cars; or in overcrowded temporary accommodation. Stories about individuals should also make an explicit link to the systemic factors that have caused someone's homelessness.

These non-stereotypical stories proved to have a significant positive impact on people's ability to think about the social causes of homelessness.

The research indicated that the public may need additional help to process stories which don't fit the dominant understanding of homelessness. When such stories are supported by the use of the constant pressure metaphor, the combined message can have a powerful effect. It increases people's understanding of what homelessness is and what causes it; their sense of collective responsibility; and support for preventative policy solutions. The combination amplifies the effects of both the stories and the metaphor.

'Poverty puts pressure on people, like water pushing against a dam. Scott was under constant pressure from his high rent and low-paying zero hours contract job. When he got ill, the pressure became too much and Scott was pushed into homelessness. Now, he's sleeping on sofas and floors. People welcome him in for a few nights, only to tell him he'll have to find somewhere else to go. His health continues to crumble and there's nothing he can do about it.

Scott's story shows what happens when our society leaves people exposed to this kind of pressure. We need to make sure that no one has to face Scott's situation, by working upstream to prevent homelessness. This means acting to fix our jobs market so that people aren't living on zero hours contracts.'

It is important that communicators avoid charity or pity stories – those that use 'othering' language, which suggest that homeless people are 'those' people that 'we' need to help. While these might be effective in the short-term, for example in driving donations, they undermine a sense of commonality.

Cement understanding by providing concrete solutions
The first stage of research showed that the public lack understanding of the solutions to homelessness and this leads to a sense of fatalism about what can be done. Communicators need to fill this gap by following up all of the framing strategies outlined in this chapter with explicit explanations of the changes needed to address homelessness. If this isn't done, people are likely to assume the problem is too big to solve, or to use their own imaginations as to the solutions.

'If we want to treat all people with dignity and humanity, we need to make sure everyone can afford a safe and stable home. We need to create more affordable housing, help people get good, stable jobs so they can pay for housing, and strengthen the social welfare system so we all have the support we need when we face difficult times.'

4.6 Embedding the new frame

Broadening public understanding of homelessness and building support for solutions needed to end it requires a concerted effort to reframe the issue from the homelessness sector and the media.

The research has shown that the long-term impact of the combined communications messages and materials of charities and other organisations profoundly affects people's understanding of homelessness. To move public attitudes into more productive territory we must develop and use a shared set of messages. It is critical they are based on the powerful evidence we now have, and are then sustained over time.

Crisis is committed to making the necessary changes to our own communications. We are also very keen to work together across the homelessness sector to achieve a collective change; telling a better story about homelessness.

"My partner and I were living in a bed and breakfast, but she had an accident... She was in hospital for two weeks. I explained the situation to the manager but even if you miss curfew for one night you're at risk of being booked out.

We were sharing a double room together and because there are so few of them available they said they couldn't wait until she was discharged. They didn't care. I know they're short of space. They're even putting people in hotels at the moment, but I just don't understand it. I think they were hoping the hospital would find us somewhere to stay but she didn't get any help at all...

We're classed as intentionally homeless because we were officially kicked out by the bed and breakfast, so now we're at the bottom of the pile again. My partner had a support worker, but he's so busy he just never calls back. In the meantime we're both on the street. Her leg is all bandaged up and purple. It's not right...

I learnt to read and write in prison and I even wrote a book there called Looking Back, about my story. It's to help other people to learn how to read and write too. Every jail in Scotland's got a copy now, and even some colleges too."

Donald, Edinburgh

Chapter 5:

Homelessness projections

The scale of homelessness across Great Britain is unacceptable. This chapter shows that if current policy choices remain in place for the next 25 years the situation will get much worse.

This chapter sets out the significant differences across the three nations and obvious policy choices that could reverse the increase in homelessness.

5.1 Introduction

Before a long-term plan for ending homelessness can be established the true extent of the problem and its likely trends over time must be understood. To this end we commissioned Heriot-Watt University to collate the best available data on trends and experiences of homelessness. We also asked the researchers to provide the known impacts of policy choices on numbers of homeless people.

This chapter draws heavily on the results of this two-stage study.[1] Resulting data shows that homelessness will continue to rise across Great Britain unless different policy choices are made.

5.2 Measuring homelessness – finding reliable data

One key reason for commissioning the study was the absence of sufficiently reliable measures of homelessness prevalence and of the demand for homelessness services. Rough sleeping data is problematic across Great Britain. In England, government figures are based on an estimate, with only 15 per cent of local authorities actually counting people on the streets.[2]

In Wales there are similar concerns about data that the Welsh Government describes as 'essentially a snapshot estimate and can only provide a very broad indication of rough sleeping levels'.[3]

In Scotland, data comes from the number of people presenting to the local authority who report having slept rough the night before, or in the previous three months. This has the obvious drawback that those not presenting to local councils will not be counted. Estimates of those who do not present range from 30 per cent [4] to 61 per cent.[5]

Much of the data reported about homelessness is actually a measure of the supply of help available to people, rather than the levels of demand for that help. For example, the numbers of people counted as using hostels and night shelters in England in 2016 was 35,727; this represents a 2% decrease on the previous year, yet 66% of accommodation projects had to turn people away because they are full.[6]

Similarly, data for hostel and night shelter use in Scotland and Wales are only routinely collected as a sub-set of figures about the use of temporary accommodation for statutory homeless households. They are not a complete picture of provision of this emergency accommodation or demand for it.

Statutory homelessness acceptances data is often used to report levels of homelessness. This is problematic in a number of ways.

1 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain.* London: Crisis.; Bramley, G. (forthcoming) *Homelessness projections: core, wider homelessness across Great Britain– extent, trends and prospects.* London: Crisis.

2 DCLG (2017) *Rough Sleeping Statistics Autumn 2016, England.* London: DCLG.

3 Welsh Government (2018) *National Rough Sleeper Count, November 2017* – Experimental Statistics. Cardiff: Welsh Government

4 Littlewood, M., Bramley, G., Fitzpatrick, S., Wood, J. (2017) *Core homelessness in Scotland's for larger cities.* Edinburgh: Social Bite and Heriot-Watt University.

5 Glasgow Homelessness Network (2015) *Annual Homelessness Monitoring Report: April 2014 - March 2015* Scotland: Glasgow Homelessness Network.

6 Homeless Link (2016) *Support for Single Homeless People in England: Annual Review 2016.* London: Homeless Link. https://www.homeless.org.uk/sites/default/files/site-attachments/Full%20report%20-%20Support%20for%20single%20people%202016.pdf

First, data about those rehoused via the statutory systems across Great Britain is a measure of the households whose homelessness has been resolved, or is in the process of resolution. It is not a measure of the actual numbers of homeless people.

Second, as with hostel data, these numbers are increasingly a measure of supply of the assistance that local authorities have resources to deliver. This issue is particularly pronounced in England. Here local authorities themselves cast doubt over the use of statutory acceptance figures as a measure of demand for their services.[7]

In England and Wales, the use of statutory homelessness figures carries a significant problem. Non-priority homeless households may not be captured if applications are never made, or people don't approach local authorities for help, knowing that they will be a non-priority case.

In Scotland, the official homelessness statistics are by far the most robust of the three nations (as detailed in Chapter 14 'Homelessness data'). However, they are still not reliable as a measure of homelessness prevalence or demand, or of the different ways people experience the problem.

Finally, across Great Britain no regular and reliable data is available for 'hidden' homeless populations. This includes people sofa surfing, people in cars, tents, squats, public transport, or 'beds in sheds'.

5.3 Defining 'core' homelessness

To present a more reliable and comprehensive estimate of homelessness across Great Britain, a model of core homelessness has been developed. Core homelessness refers to the population of people experiencing the most acute forms of homelessness, or living in short-term emergency and unsuitable accommodation. Table 5.1 below details each component group of homeless people.

Table 5.1 Core homelessness groups

Core homelessness
Rough sleeping
Sleeping in cars, tents, public transport*
Squatting (unlicensed, insecure)*
Unsuitable non-residential accommodation eg 'beds in sheds'*
Hostel residents
Users of night/winter shelters*
Domestic abuse survivors in refuges*
Unsuitable temporary accommodation (including bed and breakfast accommodation, hotels, etc
'Sofa surfing' – staying with others (not close family), on short term/ insecure basis/wanting to move, in crowded conditions (this does not include students)

*For the projections data shown in this chapter, these groups of homeless people are presented as 'other'.

To estimate levels of core homelessness in 2011 and 2016 across England, Scotland and Wales, a new model was built by Heriot-Watt University. It used secondary data sources including panel and household surveys, alongside statutory statistics and

7 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2016) *The homelessness monitor: England 2016.* London: Crisis.

academic studies.[8] Given the uncertainties and inconsistencies of some data sources, a low, mid and high range was produced.[9] All figures presented below reflect the mid-range.

5.4 Assessing core homelessness levels

Table 5.2 below details the core homeless population at any one point in time across Great Britain in 2011 and 2016.[10] In 2016, core homelessness in Great Britain stood at 158,400 households (142,000 in England, 11,000 in Scotland, 5,400 in Wales).

The largest groups of core homeless households are those who are sofa surfing (67,000), those staying in hostels, refuges and shelters (41,700) and those in unsuitable temporary accommodation (19,300).

While overall core homelessness increased between 2011 and 2016, it is worth noting that the hostel, refuge and night shelter group actually decreased. As described above, this is mostly due to the provision of this kind of homelessness assistance decreasing over this period, rather than the demand for it falling.

Many of these core homeless households are single adults of working age, although significant numbers of families with children are also contained within the groups. The research estimates that the actual number of core homeless people is 236,000. This includes 57,000 family households with 82,000 adults and 50,000 children.[11]

Core homelessness increased by 33 per cent overall between 2011 and 2016. The largest increase is within unsuitable temporary accommodation in England, which more than doubled in this period. It is also of note that while overall levels increased in England and Wales, Scottish core homelessness fell slightly. National and GB-wide future analyses are shown in the section below.

Table 5.2 Core homeless households in Great Britain 2011 and 2016

	England		Wales		Scotland		Great Britain	
Core homelessness	**2011**	**2016**	**2011**	**2016**	**2011**	**2016**	**2011**	**2016**
Rough sleepers	5,000	8,000	200	300	900	800	6,100	9,100
Tents, cars, and public transport	5,000	8,000	200	300	700	800	5,900	9,100
Squatting and non-residential accommodation	6,800	11,500	300	300	800	400	7,900	12,200
Hostels, refuges and night/ winter shelters	44,200	38,500	900	900	2,000	2,300	47,100	41,700
Unsuitable temporary accommodation	7,000	17,000	400	200	2,700	2,100	10,100	19,300
Sofa surfers	35,000	59,000	2,900	3,400	6,000	4,600	43,900	67,000
Total	**103,000**	**142,000**	**4,900**	**5,400**	**13,100**	**11,000**	**121,000**	**158,400**

(figures are rounded to nearest thousand)

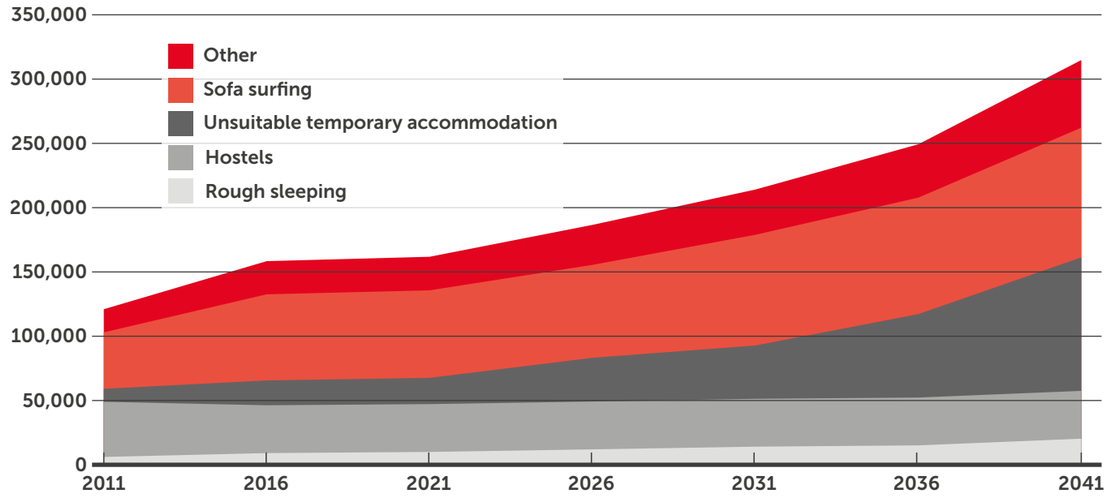
8 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain* London: Crisis. (see page 21 for details of the methodology used).

9 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain* London: Crisis.

10 The analysis shows the 'stock' figures of people experiencing homelessness at a given point in time, rather than the 'flow' figures which would be the total number of people who have been homeless over a given period of time.

11 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain* London: Crisis.

Figure 5.1: Baseline forecast of core homelessness main component, Great Britain 2011 – 41



Source: Bramley 2017

Category	2011	2016	2021	2026	2031	2036	2041
Rough sleeping	6,100	9,100	10,000	12,000	14,100	15,100	20,300
Hostels	42,900	37,200	37,200	37,200	37,200	37,200	37,200
Unsuitable temporary accommodation	10,100	19,300	20,400	34,000	41,500	64,900	103,800
Sofa surfing	43,900	67,000	68,100	72,300	86,100	90,600	100,900
Other [12]	18,000	25,800	26,100	31,100	35,200	41,500	52,600
Total	**121,000**	**158,400**	**161,800**	**186,600**	**214,100**	**249,300**	**314,800**

5.5 Forecasting homelessness

To forecast future levels of homelessness, the following two assumptions have been made. Current and planned policies in welfare and other major policy areas will continue and relatively benign conditions will prevail in the wider economy and labour market.[13]

The model that sits behind these projections uses 15 inter-dependent variables, including relative poverty, eviction rates, homelessness applications, etc.[14] The model also takes into account the relative success of the different national legislative arrangements for statutory homelessness.

Core homelessness in Great Britain (figure 5.1) is forecast to continue to grow over the next 25 years. Although in the medium term the rate of increase is tempered by a predicted correction in the affordability of the housing market. By 2041 there are predicted large increases in homelessness, largely driven by increases in England.

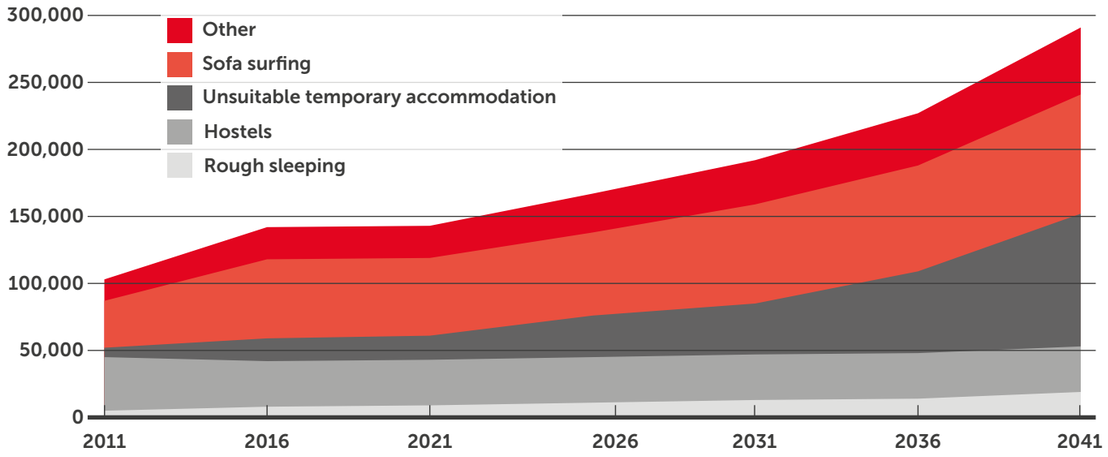
Across England, Scotland and Wales there are marked differences in projected levels of homelessness in the coming years, but also in the relative size of the different core homeless groups.

12 'Other' refers to those living in cars, tents, on public transport, squats, night shelters or refuges.

13 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain.* London: Crisis.

14 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain.* London: Crisis.

Figure 5.2: Baseline forecast of core homelessness main component, England 2011 – 41



Source: Bramley 2017

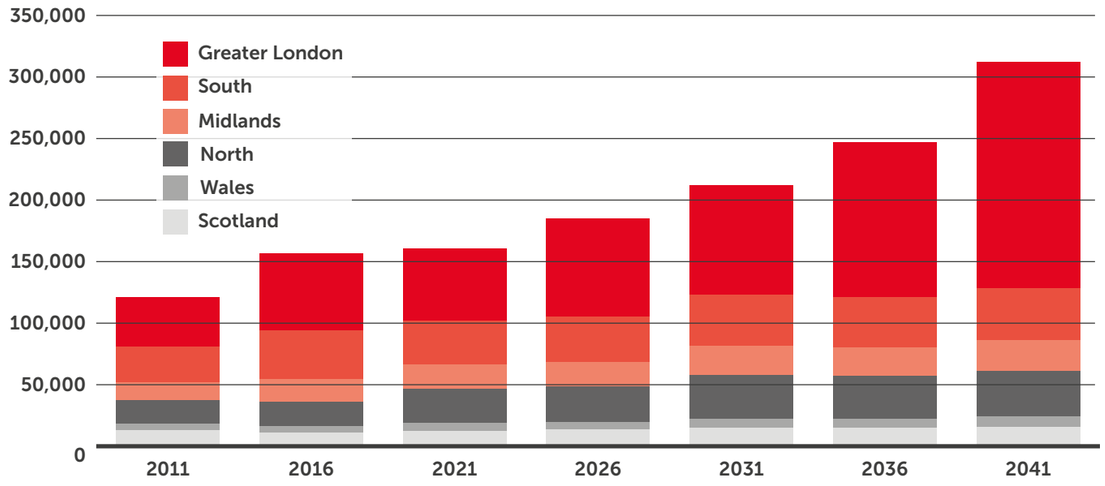
Category	2011	2016	2021	2026	2031	2036	2041
Rough sleeping	5,000	8,000	9,000	11,000	13,000	14,000	19,000
Hostels	40,000	34,000	34,000	34,000	34,000	34,000	34,000
Unsuitable temporary accommodation	7,000	17,000	18,000	31,000	38,000	61,000	99,000
Sofa surfing	35,000	59,000	58,000	62,000	74,000	79,000	89,000
Other	16,000	24,000	24,000	29,000	33,000	39,000	50,000
Total	**103,000**	**142,000**	**143,000**	**166,000**	**191,000**	**226,000**	**290,000**

England

Projections for England (figure 5.2) show an initial pause followed by an accelerated increase towards the end of the forecasted period. This is driven by a constant increase in rough sleeping, and by a dramatic rise in unsuitable temporary accommodation in London. Housing and welfare policies have a continued detrimental impact, as does the absence of targeted and effective measures to address rough sleeping.

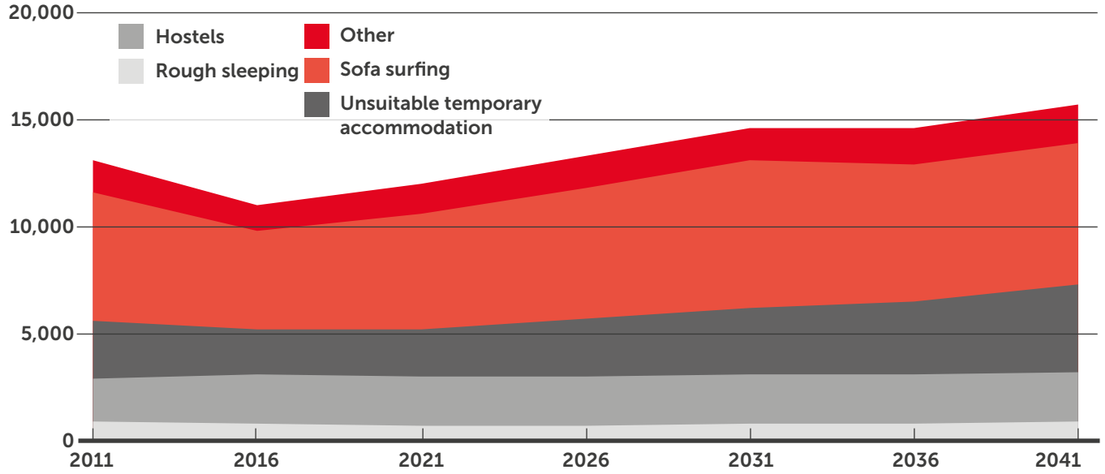
Figure 5.3 demonstrates the significant variations in core homelessness growth by English region and each nation. By 2041, 184,400 households in Greater London are homeless, compared to 104,300 for the rest of Great Britain. This is because of the scarcity of affordable housing in the capital. Having sufficient affordable housing is a way to guard against homelessness, and a resource to deal with it once it occurs.

Figure 5.3: Core homelessness components by broad region and country, 2011 – 41



Source: Bramley 2017

Figure 5.4: Baseline forecast of core homelessness main component, Scotland 2011 – 41



Source: Bramley 2017

Category	2011	2016	2021	2026	2031	2036	2041
Rough sleeping	900	800	700	700	800	800	900
Hostels	2,000	2,300	2,300	2,300	2,300	2,300	2,300
Unsuitable temporary accommodation	2,700	2,100	2,200	2,700	3,100	3,400	4,100
Sofa surfing	6,000	4,600	5,400	6,100	6,900	6,400	6,600
Other	1,500	1,200	1,400	1,500	1,500	1,700	1,800
Total	**13,100**	**11,000**	**12,000**	**13,300**	**14,600**	**14,600**	**15,700**

Scotland

In Scotland (figure 5.4), all groups of homeless people remain constant or fall, up until 2021. Then slight growth is predicted to 15,700 households by 2041. The relative success in housing supply and affordability is of note in Scotland. However, welfare reform measures and wider poverty continue to inhibit progress, as does the issue of statutory homeless people stuck in unsuitable temporary accommodation.

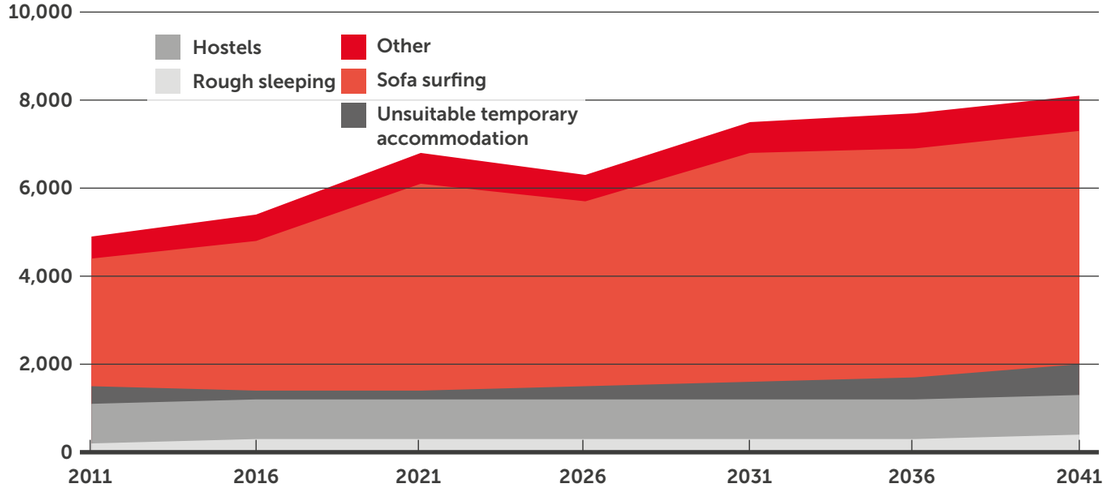
A new set of policies to tackle rough sleeping, temporary accommodation and longer term solutions to homelessness are currently being considered by the Homelessness and Rough Sleeping Action Group in Scotland.[15] Proposals on how to end rough sleeping in Scotland have now been made to the Scottish Government.[16] All of the recommendations have been accepted in principle.[17] Once agreed, and if adopted by the Scottish Government, these can be used to reforecast the data.

15 Scottish government (2017) *Homelessness and rough sleeping action group.* https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group

16 Scottish Goverment (2018) *Ending rough sleeping in Scotland: interim report.* https://beta.gov.scot/publications/ending-rough-sleeping-in-scotland-interim-report/

17 Scottish Government (2018) *Action to end rough sleeping.* https://beta.gov.scot/news/action-to-end-rough-sleeping/

Figure 5.5: Baseline forecast of core homelessness main component, Wales 2011 – 41



Source: Bramley 2017

Category	2011	2016	2021	2026	2031	2036	2041
Rough sleeping	200	300	300	300	300	300	400
Hostels	900	900	900	900	900	900	900
Unsuitable temporary accommodation	400	200	200	300	400	500	700
Sofa surfing	2,900	3,400	4,700	4,200	5,200	5,200	5,300
Other	500	600	700	600	700	800	800
Total	**4,900**	**5,400**	**6,800**	**6,300**	**7,500**	**7,700**	**8,100**

Wales

In Wales (figure 5.5), core homelessness is set to rise significantly, with a number of factors contributing. General economic performance is predicted to be weaker than the UK average during the forecasted period, and housing market pressures within England are set to 'spill over into Wales'.[18]

These data forecast ongoing success in homelessness prevention, following the introduction of new duties under *The Housing (Wales) Act 2014*.[19] However, it is clear that without a wider strategy to capture those failed by the statutory system, and broader structural factors, these changes will be insufficient.

18 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain* London: Crisis.

19 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2017) *The Homelessness Monitor: Wales 2017.* London: Crisis

5.6 The potential impact of different policy choices

The factors identified as drivers of core homelessness include[20]: poverty, which is closely aligned with sufficiency in social security and therefore welfare reform measures, and homelessness prevention. This includes the ability of local authorities to employ prevention measures that successfully negate the need for rehousing (and use of unsuitable temporary accommodation).

Having identified these areas, the forecasting model was used to project a range of 'what if' scenarios that reflect modest changes to some relevant policy areas. See figure 5.6 below.

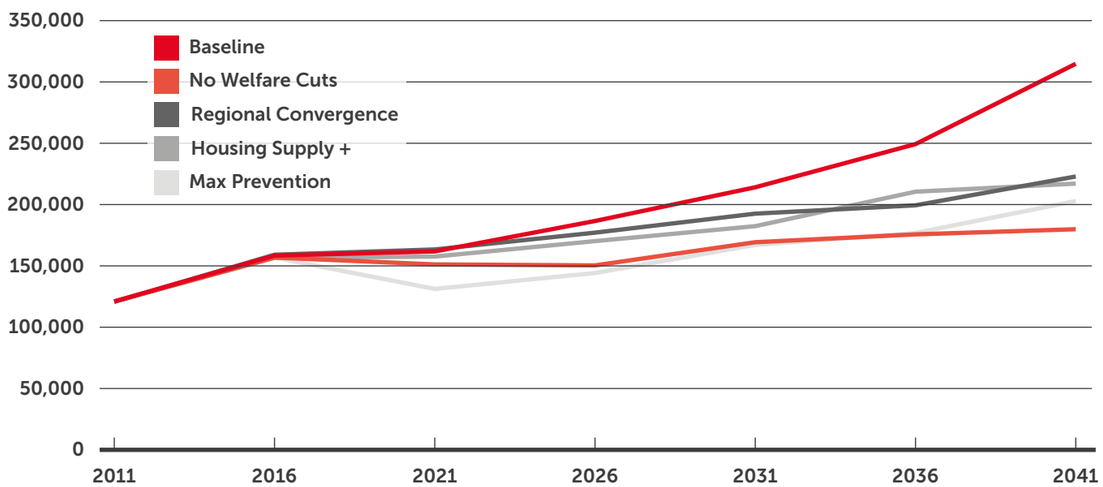
The first scenario tested was a policy choice not to go ahead with the planned welfare cuts for the period 2016-21, or any similar such cuts in the 2020s. The model suggests this has a clear and positive impact, with a 42 per cent reduction by 2041 compared to the baseline projection.

The second scenario tested was a substantial increase in new housing supply of 60 per cent, including social/affordable units. This alters the core homelessness forecast substantially. It involves a 15 per cent reduction against the baseline by 2036, and a particular reduction in rough sleeping and unsuitable temporary accommodation in London and the South East of England.

The third scenario presents the idea of 'maximal prevention',[21] which involves all local authorities in Great Britain matching the activities of those with the most meaningful and successful prevention activities. This again has a positive impact on future projections, with a large reduction of 25 per cent against the baseline by 2026.

These are a snapshot of the singular impacts of different policy choices, rather than a comprehensive and aggregated solutions framework. However, they reinforce the conclusion of Chapter 2 on public policy and homelessness that current and future levels of homelessness are a reflection of political choices.

Figure 5.6: Summary of scenarios and impact on core homelessness in Great Britain



Source: Bramley 2017

20 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain* London: Crisis.
21 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain* London: Crisis.

5.7 Acknowledging wider homelessness

In the process of considering and gathering improved data about the most acute core elements of homelessness in Great Britain, Heriot-Watt also built a model of those who are considered to be in the wider homelessness group. This includes a range of situations including other statutory homeless households who have been housed in suitable forms of temporary accommodation; and people at risk of core and statutory homelessness.[22]

Wider homelessness
Staying with friends/relatives because unable to find own accommodation (longer term)
Eviction/under notice to quit (and unable to afford rent/deposit)
Asked to leave by friends/relatives
Intermediate accommodation and receiving support
In other temporary accommodation (eg conventional social housing, private sector leasing)
Discharge from prison, hospital and other state institutions without permanent housing

Those within the wider homelessness group are a broader group of people, experiencing insecure or poor housing. They may have recently experienced core homelessness, or are statutorily homeless and have been rehoused in suitable temporary accommodation including social housing. Statutory households still in emergency accommodation or unsuitable (such as bed and breakfasts) are counted within the core homeless group.

It is important to acknowledge this wider group, and also the cross over in the definition of homelessness ended between core and at risk homelessness. In reality the two groups will cross over in a number of ways and some households in the wider homeless group, are more at risk of experiencing core homelessness than others. For the purposes of definitions four and five, we have identified that 87,892 households in wider homelessness are at risk. It remains important, however, to identify and highlight the most acute forms of homelessness to design strategies for tackling the problem in its most pernicious forms.

5.8 Conclusion

Although many people are protected by the homelessness systems and entitlements across Great Britain, homelessness remains a devastating problem, set to rise further if current policy choices are continued. We are on course to witness a catastrophic rise in the most acute and damaging forms of homelessness.

The modelling of different policy choices against these projections, does however offer a source of hope and inspiration. There is clear evidence that short and long-term policy choices can make a substantial difference to homelessness projections. Consequently, it is imperative to advocate evidence-based choices that will make the greatest difference. The following chapters do that.

22 Bramley, G. (Forthcoming) *Homelessness projections: core, wider homelessness across Great Britain–extent, trends and prospects.* London: Crisis.

"When I spoke to my probation officer leading up to my release, they said they would find me accommodation. My last week went by, and I'd still not heard anything. They just said the right people hadn't got my paperwork yet...

When I came to be released they didn't seem that interested. They gave me a train ticket to Cardiff and said I should go to the council and register as homeless...I waited five hours at the housing office to explain what had happened, but they just sent me to a homeless shelter in town...

It was quite a shock. You see these places on the television, but to actually be in there yourself is very different. There were a lot of drugs and alcohol.

You had to leave every day at 8am, and you can't go back until 9pm. I didn't want to just wander the streets all day, so I offered to clean in return for food vouchers. If it wasn't for that I wouldn't have had anything to eat at all...

I rely on food donations from charity most of the time. You can see why people start to beg, but I can't bring myself to do that... I couldn't bear for my sons to see me on the street.

I worked in the steel works for 14 years, but we got laid off when it went into liquidation. I had a nice house and a nice car, but then I made a stupid mistake. I went to jail for two years...

I'll have to look at private renting. Lots of landlords won't take people on benefits though. I've rung a few and they all say no DSS. They also want a guarantor, and I've got no one I can ask. I just have to hope I can find somewhere I can call home...

I'm 53, and I just want to get on with my own life now, but it's like I came out of prison still in chains."

Paul, Cardiff

Chapter 6:

Preventing homelessness

The best way to tackle homelessness is to stop it happening in the first place. To do so is both cost effective and humane.

The concept of homelessness prevention is well developed across Great Britain, but gaps still exist that stop some people getting the help they need, when they need it most.

Prevention services must be available to everybody at immediate risk of homelessness. And the on-going failure of state institutions to prevent people falling into homelessness when discharged from their care must be addressed.

There are gaps in the law that must be filled to protect people from homelessness. With these gaps filled, and with sufficient funding for effective services, everyone at immediate risk could have their homelessness prevented.

6.1 Introduction

What do we mean by homelessness prevention?

This chapter sets out how to achieve the fourth and fifth definitions of 'homelessness ended' as described in Chapter 3 'Defining homelessness ended'.

Definition 4 – No one homeless as a result of leaving a state institution such as prison or the care system.

Definition 5 – Everyone at immediate risk of homelessness gets the help they need that prevents it happening.

Definition 4 relates to successful homeless prevention for people who have been the responsibility of the state. This includes: previously looked after children (care leavers); people released from prison; people leaving the armed forces, and people discharged from NHS care. It also includes people who have been the responsibility of the Home Office through the asylum and immigration system.

Importantly, this definition is about the point of transition when leaving state institutions/care. It is not about preventing the prospect of future homelessness for all those who have ever been in care, prison, etc.

Transition is the opportunity for successful prevention. There is solid evidence that these opportunities are consistently missed, leading to people leaving state institutions being over-represented in the homeless population.[1]

But although definition 4 is about a transition, prevention of homelessness should start much earlier – before the person's actual transition, or departure from an institution. Because exit dates from institutions such as prison are often known many months or even years in advance, arranging appropriate housing arrangements before release can be done much earlier.

Definition 5 relates to preventing homelessness for those at immediate risk of it. 'Immediate' refers to an assessment that homelessness is likely to occur in the next 56 days. This reflects the current statutory framework in Wales and England. In these countries, local authorities have a duty to take reasonable steps to help prevent homelessness up to 56 days before it happens. As detailed later in this chapter, we strongly recommend that Scotland adopt a similar duty.

Combined, these definitions present a targeted approach. They support those groups identified as at an acute risk of homelessness, and those people who need immediate action to stop it happening. There is likely to be some crossover between the two groups.

Prevention can be seen as a continuum of action depending on how 'early' the intervention occurs in the predicted likelihood of a problem.

It is useful to see the definitions adopted for this plan within the framework set out in studies on homelessness prevention,[2] which reflects a wider agenda for 'early action' in public services.[3]

1 Mackie, P. and Thomas, I. (2014) *Nations apart? Experiences of single homeless people across Great Britain*. London: Crisis.

2 Pawson, H., Netto, G., Jones., C., Wager, F., Fancy, C., Lomax, D. (2007) *Evaluating Homelessness Prevention*. London: Department for Communities and Local Government; Busch-Geertsema, V. and Fitzpatrick, S. (2008) 'Effective Homelessness Prevention? Explaining Reductions in Homelessness in Germany and England.' *European Journal of Homelessness*, 2: Pages 69-95.

3 Community Links. (2014) *Towards Effective Prevention: Practical Steps for the Next Government*. London: Community Links.

- **Primary prevention:** Action to avoid a household becoming homeless. This is applied to either the whole or large parts of the population. It is often best expressed as 'minimising the risk of problems arising',[4] through strategies including poverty alleviation, education and school programmes, or generally increasing the supply of housing.

- **Secondary prevention:** Action to prevent future homelessness based on a judgement that households are from a high-risk group.

- **Tertiary prevention:** Rapid rehousing or resettlement for those people who have already experienced homelessness. This is commonly also referred to as 'homelessness relief'.

The strategies recommended in this chapter fall within the secondary prevention category. Through this focus we are not diminishing the importance of primary measures in a broader context to address links to homelessness. Addressing homelessness is not a replacement for action to reverse rates of poverty, inter-generational deprivation, and other issues that affect the broader risks of homelessness over time.[5]

What works in homelessness prevention?

To gather evidence of successful interventions and policy changes in preventing homelessness, we researched the extensive literature already in place and commissioned research where necessary, this included the following:

- The Social Care Institute for Excellence (SCIE) undertook a 'Rapid Evidence Assessment' of interventions to tackle homelessness. This included a specific assessment on homelessness prevention across the world.[6] The study applied rigorous standards of evidence to establish a baseline of 'what works' in prevention generally and for specific groups of people at risk.

- Dr Peter Mackie led an international evidence review of the interventions designed to tackle rough sleeping.[7] The study looked at 'what works' to end the rough sleeping of people already experiencing it, but crucially also how to prevent it.

- To supplement the academic approach to evidence gathering, we also undertook a major consultation on policy solutions to homelessness over 2017/18.[8] The consultation involved 85 events across Great Britain. Experts with lived experience of homelessness and those working in the sector gave their views about the policy changes needed to end homelessness. This process reached more than 1,000 people, and included a focus on prevention at every event.

4 Homeless Link. (2015) *Preventing Homelessness to Improve Health and Wellbeing*. Homeless Link.

5 Bramley, G. (Forthcoming) *Homelessness projections: core, wider homelessness across Great Britain – extent, trends and prospects*. London: Crisis.

6 SCIE (2018) *A rapid evidence assessment of what works in homelessness services*. London: SCIE.

7 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. Crisis: London.

8 Hughes, N. (2018) *Have your say policy consultation: summary report*. London: Crisis.

The standard of evidence about how to prevent homelessness varies. We know that homelessness has been successfully prevented for different groups (for example, for armed forces veterans in the late 1990s and early 2000s).[9] However, there is an urgent need to improve data collection and outcome measurement in this area. Despite the lack of strong evidence there are good-practice examples and we indicate these in this chapter wherever possible.

6.2 Counting the cost – prevention and savings

The human cost of homelessness is at its highest when it is continual or is recurrent. Repeated and long-term exposure to homelessness damages physical and mental health. It also seriously affects the financial and social prospects of people and their families.

The financial cost and cost savings of effective prevention are also important. In the US and parts of Europe, the patterns of service use by homeless people have been explored by merging large-scale administrative datasets.

This research found that higher rates of service use – medical, mental health or criminal justice – are associated with long-term and repeat homelessness.[10] By looking at the way homeless people use services, the research identified the high financial costs of long-term and repeat homelessness.

A recent study, which interviewed 86 people, who had been homeless for at least 90 days, concluded public spending would fall by £370 million if 40,000 people were prevented from experiencing one year of homelessness.[11] The savings echo similar findings in both the US and Australia.[12]

The economic case for intervening earlier to prevent the suffering of homeless people was brought to public attention in the US in 2006, in *The New Yorker* magazine. It featured the tragic life and death of Murray Barr, or 'Million Dollar Murray'.[13]

Murray Barr, from Reno, Nevada was a well-known homeless man, famed locally for his alcoholism and outrageous behaviour. Over the ten years he was street homeless in Reno, Murray Barr was repeatedly arrested and admitted to hospital. However, he was always released back to the street rather than into housing.

Following his death, local police officers calculated Murray's cost to local public services, including hospital care and short-term abstinence programmes. They concluded: 'It cost us one million dollars not to do something about Murray'.

9 Johnson, S., Jones, A. and Rugg, J. (2008) *The experiences of Homeless Ex-Service Personnel in London*. York: Centre for Housing Policy, University of York.

10 Culhane, D.P. (2008) 'The Costs of Homelessness: A Perspective from the United States', *European Journal of Homelessness* 2(1), 97-114; Pleace, N., Baptista, I., Benjaminsen, L., Volker Busch-Geertsemal (2013) *The Costs of Homelessness in Europe: An Assessment of the Current Evidence Base*. Brussels: FEANTSA; Benjaminsen, L. and Andrade, S.B. (2015) 'Testing a Typology of Homelessness Across Welfare Regimes: Shelter Use in Denmark and the USA.' *Housing Studies*, 30(6), 858-876.

11 Pleace, N. and Culhane, D. P. (2016) *Better than cure? Testing the case for Enhancing Prevention of Single Homelessness in England*. London: Crisis.

12 Zaretzky, K. and Flatau, P. (2013) *The costs of homelessness and the net benefit of homelessness programs: a national study.* Melbourne: AHURI final report no. 205.

13 Gladwell, M. (2006) 'Million-Dollar Murray: Why problems like homelessness may be easier to solve than to manage', *The New Yorker*, 13 February. https://www.newyorker.com/magazine/2006/02/13/million-dollar-murray

6.3 Examining the political context

'We are absolutely changing the focus of the way that we deal with homelessness in Wales, rather than an element of dealing with homelessness at a reactive stage. We are looking at a preventative model and are working through with people, at a very early stage, the duties of local authorities to deal with homelessness.'

Carl Sargeant AM, Introduction of the Housing (Wales) Bill, 19 Nov 2013.[14]

'I know that the bill cannot do everything. It will not tackle issues relating to supply, and it will not be a magic bullet to clear the streets of homeless people overnight. What it will do, however, is introduce a long-term cultural change which will, over time, bring about a different way of working among local authorities that will stop people from getting into the terrible position of being homeless in the first place.'

Bob Blackman MP, The Homelessness Reduction Bill, Second Reading, 28 Oct 2016.[15]

There is a strong political consensus across England, Scotland and Wales on the need to fund and to promote measures that prevent homelessness. This dates back to *The Housing (Homeless Persons) Act (1977)*, which gave duties to local authorities to assist people under imminent threat of homelessness (albeit only for those classed as 'priority need').

Across Great Britain, each nation is now at a different stage of adopting formal and legally enforced approaches to homelessness prevention, as detailed below.

Outside the statutory homelessness system, we also have a number of key assets that assist homelessness prevention. People at risk of homelessness can access state support with housing costs, and use public services without charge, including the NHS and social care. In an international context, these are big advantages in the fight to prevent and end homelessness.

England

In England, the prevention agenda was expanded in 2002/3 when the government introduced a legal duty for local authorities to produce homelessness prevention strategies.[16] This was alongside the formal introduction of the Housing Options approach. The introduction of preventative strategies was set against the backdrop of rapidly rising acceptances of statutory homelessness applications.[17] See figure 6.1 overleaf.

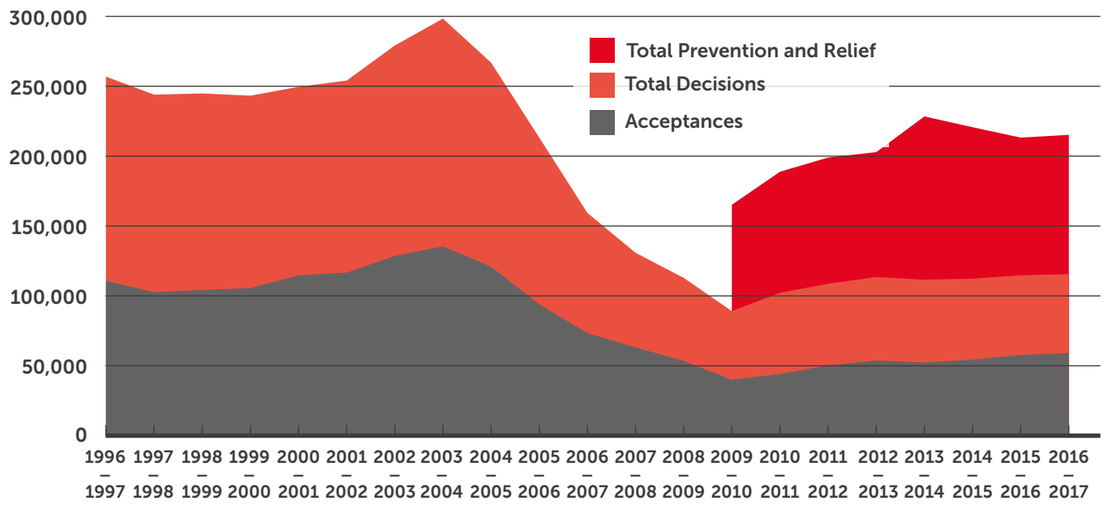
14 Welsh Assembly (2013) *Statement Introduction of the Housing Bill*. Record of Proceedings, 14:36. 19th November: http://www.assembly.wales/en/bus-home/pages/rop.aspx?meetingid=185#C111007

15 Homelessness Reduction Act (2016) *House of Commons second reading debate, 28 October 2016*. https://hansard.parliament.uk/Commons/2016-10-28/debates/D25DDE1B-CE4D-4887-A9DD-A45F8D3890D6/HomelessnessReductionBill

16 Homelessness Act 2002

17 By 2003, statutory acceptances had risen 30% in 6 years. Pawson, H., Netto, G., Jones., C., Wager, F., Fancy, C. and Lomax, D. (2007) *Evaluating Homelessness Prevention*. London: Department for Communities and Local Government.

Figure 6.1: Increase in prevention activities — England



Source: MHCLG

Housing Options is a catchall description. It encompasses the ways a local authority can strive to prevent homelessness, and the need for a household to be rehoused under the 'full' homelessness duty to provide an offer of new settled accommodation. Typically, this involves a personalised plan, either to keep a household in their existing home, or to quickly access alternative accommodation, often in the private rented sector.

This approach has been lauded as a culture shift that means 'a proactive rather than reactive style, with an increased emphasis on networking, negotiation and creativity'.[18] However, Housing Options critics have pointed to the freedom local authorities have to stop (or 'gate-keep') homeless households from making an application for assistance, and from accessing their entitlements to rehousing once homeless.[19] This is seen as a particular risk when authorities have access to a limited stock of social housing and a prohibitively expensive private rented sector.

A decade after Housing Options was introduced in England, concerns developed regarding funding cuts affecting some local authorities' abilities to deliver a successful Housing Options service. Additionally homelessness prevention sat outside the statutory framework. This left local authorities exposed to legal challenge when providing preventative services as opposed to access to the full duty to rehouse people.[20]

18 Pawson, H., Netto, G., Jones., C., Wager, F., Fancy, C. and Lomax, D. (2007) *Evaluating Homelessness Prevention.* London: Department for Communities and Local Government.
19 Busch-Geertsema, V. and Fitzpatrick, S. (2008) 'Effective Homelessness Prevention? Explaining Reductions in Homelessness in Germany and England.' *European Journal of Homelessness*, 2: 69-95.
20 Gousy, H. (2016) *No One Turned Away: Changing the law to prevent and tackle homelessness.* London: Crisis.

In 2014 we published our *No One Turned Away* report. It documented the experiences of 'mystery shoppers' presenting cases of homelessness and significant vulnerabilities in 87 local authority visits across England.[21] This report highlighted good practice in some local authority areas, but also systematic 'gatekeeping' in others, where people were denied the chance to explain their needs and to access services.

In 2015, we assembled a panel of experts to consider options for legal reform in England. This group was drawn from leading homelessness charities, academia, local authorities, housing specialists and legal experts. Leading academic expert, Professor Suzanne Fitzpatrick, chaired the group. Over six months, the group considered recommendations for reform that would increase entitlements for single homeless people, and protect duties owed to priority households (typically families with dependent children).

In February 2016, the panel produced a set of proposals that owed much to the emerging example in Wales. They focused heavily on the benefits of both homelessness prevention, and of removing eligibility barriers for homeless households.[22] These proposals were crafted into a potential parliamentary bill to demonstrate to MPs the necessary legal steps for achieving the aims of the panel report.

Later in 2016, Conservative back-bench MP Bob Blackman was drawn in the private members' ballot for the parliamentary session, and chose to adopt the reforms set out by the panel. Mr Blackman's proposals became the Homelessness Reduction Bill,[23] for which he gained cross-party and government support. The bill received royal assent in April 2017. The majority of the duties contained in the *Homelessness Reduction Act (2017)* came into force in April 2018.

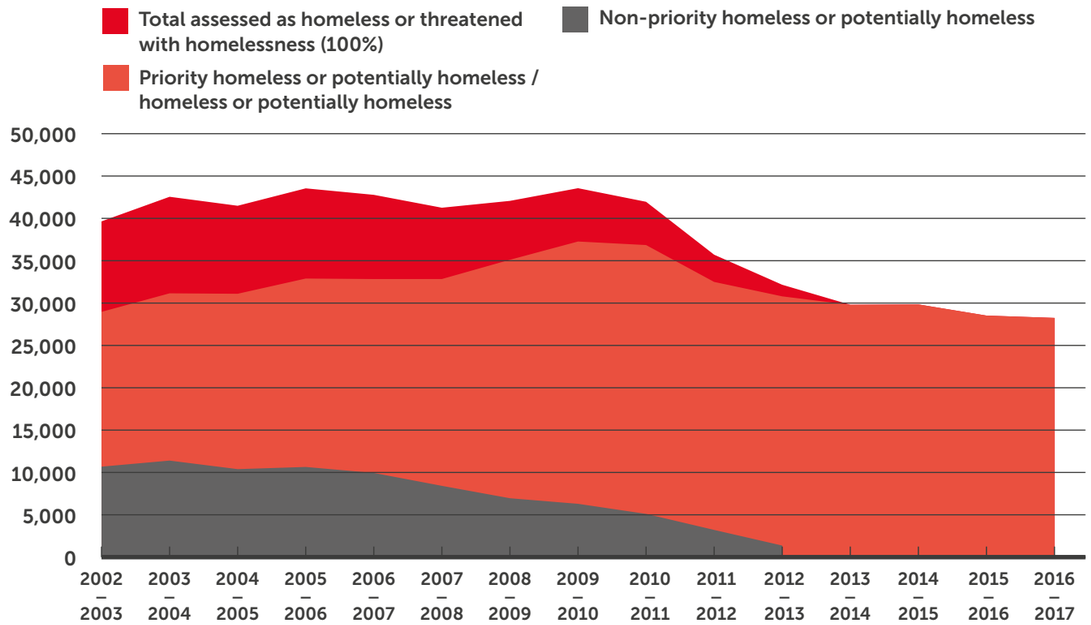
Local authorities in England are broadly in favour of the purpose of these reforms. However, they have expressed concern about the availability of funding and accessible housing stock to enable them to successfully discharge their new duties.[24] The government has allocated councils £72.7 million to local authorities. But estimates from London Councils claim that the new duties will cost London boroughs alone £77 million per year.[25]

Scotland

As detailed in Chapter 2 'Public policy and homelessness', homelessness reform in Scotland, following devolution of powers in 1997, focused on abolishing priority need. This followed the passage of *The Homelessness etc. (Scotland) Act (2003).* Alongside this major reform, effective in 2012, the Scottish Government made significant investments in homelessness prevention (see figure 6.2).

21 Dobie, S., Sanders, B. and Teixeira, L. (2014) *Turned Away: The treatment of single homeless people by local authority homelessness services in England.* London: Crisis.
22 Crisis (2015) *The homelessness legislation: an independent review of the legal duties owed to homeless people.* London: Crisis.
23 Parliment.uk (2018) *Homelessness Reduction Act 2017: Progress of the Bill.* https://services.parliament.uk/bills/2016-17/homelessnessreduction.html
24 Messih, J. (2017) 'Homelessness Reduction Act: is the funding sufficient?', Inside Housing, 20 December. https://www.insidehousing.co.uk/insight/insight/homelessness-reduction-act-is-the-funding-sufficient-53650
25 Kappala-Ramsamy, G. (2017) 'Fully fund services to address homelessness in London.' https://www.londoncouncils.gov.uk/node/33095

Figure 6.2: End of priority need in Scotland



Source: Scottish Government

In 2010 the government introduced Housing Options, providing investment of just under £1 million. It established five Housing Options Hubs to share best practice and practical assistance on a regional basis. The Scottish Housing Options is described as:

'A process which starts with housing advice when someone approaches a local authority with a housing problem. This means looking at an individual's options and choices in the widest sense. This approach features early intervention and explores all possible tenure options, including council housing, Registered Social Landlords and the private rented sector. The advice can also cover personal circumstances which may not necessarily be housing related, such as debt advice, mediation and mental health issues.'[26]

As in England,[27] the introduction of Housing Options had an immediate and dramatic impact on the statutory homelessness system. Applications fell by 19 per cent in 2011/12, and then by a further 13 per cent in 2012/13. Acceptances have reduced by 23 per cent since 2010/11.

The principle of homelessness prevention through Housing Options has widespread support in Scotland, but there are serious concerns about its practical application. In 2014 the Scottish Housing Regulator published a review of Housing Options,[28] which reported:

'Staff in some councils are working to targets for the reduction of homelessness applications as a performance measure for Housing Options. The use of reductions in numbers of homeless applications as a solitary measure of the success of Housing Options can introduce the risk of organisational behaviours that act against the achievement of good outcomes for people in need. We saw a number of examples where local authorities had targets in place and where people who were homeless were not being provided with appropriate advice and assistance in accordance with the homeless legislation.'

This reflects a regularly reported concern about the prevalence of gate-keeping practices. There is also a concern that official homelessness acceptances and prevention statistics reflect a mixture of good practice and outcomes for households, and some poor practice diverting people from help.[29]

These concerns, and recent successes in Wales in extending homelessness prevention duties to local authorities, have led to calls in Scotland to extend the statutory homelessness system to include preventative approaches. This is something that the Scottish Government is currently considering,[30] and is wholly endorsed by Crisis.

Wales

Until 2014, Wales had the least developed homelessness prevention approach of the three nations. It had not adopted Housing Options in the same way as Scotland or England.

Following the advent of primary law making powers for the Welsh Government in 2011, the priority of tackling homelessness through improved legislation soon emerged.[31] Dr Peter Mackie from Cardiff University was commissioned by the Welsh Government to review homelessness legislation, and to make proposals for improvements.

The Mackie Review sought to address two key weaknesses in the existing system. First, there was a growing inconsistency in preventative Housing Options approaches, which sat outside the statutory framework. Second, that often no 'meaningful assistance' was given to non-priority homeless people, especially single men.[32] In response, Mackie proposed a 'housing solutions' model. This model would switch the emphasis of local authorities to preventative and flexible interventions, aimed at resolving homelessness before the main rehousing duty was necessary.[33]

The proposed new approach would entail a duty on local authorities to 'take all reasonable steps to achieve a suitable housing solution for all households which are homeless or threatened with homelessness'. Mackie suggested extending the period when someone could be deemed to be

26 Scottish Housing Regulator (2014) *Housing Options in Scotland, a Thematic Inquiry.* Scottish Housing Regulator.

27 The *Homelessness Act (2002)* placed a greater emphasis on the Housing Options approach, which encouraged local authorities to assess a person's legal right to settled housing alongside broader consideration of other possible options open to them in order to prevent and relieve their homelessness. Immediately following the introduction of this approach the number of people accepted as statutorily homeless started to decline. For further detail see: Gousy, H. (2016) *No One Turned Away: Changing the law to prevent and tackle homelessness.* London: Crisis

28 Scottish Housing Regulator (2014) *Housing Options in Scotland, a Thematic Inquiry.* Glasgow: Scottish Housing Regulator.

29 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The homelessness monitor: Scotland 2015.* London: Crisis.

30 Scottish Government (2017) *Homelessness and rough sleeping action group.* https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group

31 Connell, A. (2016) *The Development and Implementation of Part 2 of the Housing (Wales) Act 2014: Lessons for Policy and Practice in Wales.* Cardiff: Public Policy Institute for Wales.

32 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Wales 2015.* London: Crisis.

33 Mackie, P., Fitzpatrick, S., Stirling, T., Johnsen, S., and Hoffman, S. (2012) *Options for an Improved Homelessness Legislative Framework in Wales.* Cardiff: Welsh Government.

threatened with homelessness from 28 to 56 days. He also said the prevention duty should be owed to all applicants, regardless of priority need, local connection or intentionality.[34]

These recommendations were adopted by the Welsh Government in *The Housing (Wales) Act (2014)*. More widely, homelessness prevention alongside other elements of early intervention have become part of the Welsh Governments Future Generations Strategy.[35]

These reforms have been largely welcomed in Wales,[36] particularly because they have increased the number of people that can be helped, and have increased the flexibility of local authority services.[37] The headline statistics report a 69 per cent reduction in homelessness acceptances between 2014/15 and 2015/16. For people threatened with homelessness, 65 per cent had their homelessness successfully prevented in 2015/16.[38]

The reforms are not without criticism, however. The changes did not reduce the numbers of people needing help; rather they offer a broader and different set of ways to do so, particularly in services to prevent homelessness. The 2014 Act did little to tackle rising rough sleeping in Wales, and there are concerns that a number of groups are still failing to access meaningful help, including those deemed to have 'failed to co-operate' with housing authorities.[39]

In general, there is a strong consensus for preventative approaches in Wales.[40] The successes for people accessing the system are the most promising of the three national approaches across Great Britain. However, the full potential of *The Housing (Wales) Act (2014)* has not yet been realised. There is on-going concern that the culture shift at local level towards problem-solving and person-centred prevention has not yet become the norm across Wales.[41]

England, Scotland and Wales – areas for further reform

In common with legal reforms in England and Scotland, the 2014 Act in Wales still leaves significant holes in the safety net of homelessness prevention. There are groups of people unable to access statutory homelessness prevention in England and Wales, such as migrant homeless people or rough sleepers.

There also remains a fundamental disjoint between the public service responsible for homelessness prevention (local authorities), and the services best placed to deliver the prevention itself (prisons, hospitals, the armed forces, etc).

In England this is exacerbated in some 'two-tier' authority areas where the homelessness duties sit at a district or borough level, but the resources for housing support sit at a top-tier or county level. A complete safety net of homelessness prevention must resolve these problems, and recommendations for achieving this are set out below.

34 Mackie, P., Fitzpatrick, S., Stirling, T., Johnsen, S., and Hoffman, S. (2012) *Options for an Improved Homelessness Legislative Framework in Wales.* Swansea: Welsh Government.
35 Well-being of Future Generations (Wales) Act 2015
36 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Wales 2017.* London: Crisis.
37 Shelter Cymru (2016) *Reasonable Steps: Experiences of Homeless Services Under the Housing (Wales) Act 2014.* Cardiff: Shelter Cymru.
38 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Wales 2017.* London: Crisis.
39 Mackie, P., Thomas, I. and Bibbings, J. (2017) 'Homelessness Prevention: Reflecting on a Year of Pioneering Welsh Legislation in Practice'. *European Journal of Homelessness,* Volume 11. Pages 81-107
40 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. & Watts, B. (2015) *The Homelessness Monitor: Wales 2017.* London: Crisis.
41 Auditor General for Wales (2018) *How Local Government Manages Demand – Homelessness*. Cardiff: Wales Audit Office.

Understanding public attitudes and prevention

The political understanding and appetite for homelessness prevention is clear. This has produced tangible and successful policies that provide 'secondary prevention' for those at imminent risk of homelessness. Public understanding and support for homelessness prevention is, however, largely absent.

The major study into public attitudes of homelessness conducted by the FrameWorks Institute[42] has revealed that the general public have a limited understanding of what homelessness prevention is. This means they are unlikely to support or demand the necessary changes to policy or public services.

The dominant cultural understanding of homelessness in the UK is that it is an individual problem associated with poor life choices and circumstances. This is compounded by a fatalistic view that there will always be people that 'fail' in their life and become homeless. When this cultural model is dominant in public attitudes towards homelessness, people are unlikely to support prevention measures.

The mainstream media and the homelessness sector itself are strongly reinforcing this public view. Compounding this is the absence of prevention within the messages and stories the public receives.

A full exploration of public attitudes and homelessness is contained in Chapter 4 'Public attitudes to homelessness'. There is strong evidence that alongside political choices to extend and improve support for people at risk of homelessness, the homelessness sector itself must play its part by explaining to the public that prevention is possible.

Preventing homelessness – the international context

Successful attempts to tackle homelessness around the globe are often focused on reductions in rough sleeping or chronic homelessness. Commonly cited examples include:

- the Finnish success in reducing long-term homelessness through Housing First[43]
- the success of the 100,000 Homes campaign in the US to house 'chronic and vulnerable' rough sleepers[44]
- the town of Medicine Hat in Canada that declared in 2015 that it had ended homelessness (rough sleeping)[45]

These and other examples share an approach to tackling homelessness that focuses first (and sometimes exclusively) on tackling rough sleeping, the most dangerous and also least prevalent form of homelessness. This is understandable from a moral standpoint, given the extreme dangers faced by rough sleepers. But a strategy to alleviate rough sleeping alone does nothing to address the reasons people sleep rough to start with, or to tackle the misery of other forms of homelessness. These international comparisons offer a warning to governments in

42 O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D. and Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom*. Washington: FrameWorks Institute.
43 Housing First Europe Hub (2017) *Finland*. http://housingfirsteurope.eu/countries/finland/
44 Leopold, J. and Ho, H. (2015) *Evaluation of the 100,000 Homes campaign*. Washington: Urban Institute.
45 BC Radio Canada (2015) *Medicine Hat becomes the first city in Canada to eliminate homelessness* http://www.cbc.ca/radio/asithappens/as-it-happens-thursday-edition-1.3074402/medicine-hat-becomes-the-first-city-in-canada-to-eliminate-homelessness-1.3074742

Britain, and anyone planning to tackle homelessness without due emphasis on prevention. Homeless people with acute and multiple support needs take up a disproportionate amount of public spending,[46] and the failure to act early to prevent the escalation of needs and human costs is both socially and financially irresponsible. This is also why an agenda to tackle and prevent homelessness must combine with wider government strategies such as anti-poverty and family support, so that the future risk of homelessness is avoided.

6.4 What works

The SCIE study into 'what works' to tackle homelessness,[47] looked at the evidence base for prevention services. This included services for people at immediate risk, and also those to prevent homelessness for people leaving state institutions. The final part of this section also looks at the evidence base for the prevention of youth homelessness.

Services for people at immediate risk

The SCIE study found that successful prevention services for people at immediate risk of homelessness have the following core elements.

- **A case management approach** to prevention was identified as important because it provides a basis for personalised solutions that help households avoid homelessness. This typically involves a joint plan of action being drawn up with the household members at risk of homelessness, by a trusted housing professional. The plan includes elements of choice and a reality check of what is actually possible.
- **Speedy access to financial support** was a common element to a number of successful programmes. Short-term financial support is usually used for rent, security deposits or utility bills. But flexibility is key to a problem-solving approach, so it should not be limited to these items.
- **The provision of expert advice** was also identified as effective. This involves advice on welfare entitlements, and information about relevant services on offer, such as short-term emergency accommodation. Having a 'case manager' to assist in accessing help is also important, especially where somebody may need an advocate for help with benefit claims or accessing other support services.

Housing Options is not, strictly speaking, an evidence-based programme, but it contains all elements identified as successful from the international evidence. Personalised and flexible case management, alongside provision of expert advice and financial assistance, are all elements of a good Housing Options service.[48]

While there is an on-going need for improved data collection and sufficient funding for Housing Options, it is also very positive that all three nations have adopted the model. This is reinforced by the analysis from Heriot-Watt University, which found that 'maximal prevention' through a Housing Options approach is an impactful measure in lowering projected levels of homelessness.[49]

46 Culhane, D., Metraux, S. and Hadley, T. (2002) *Public Service Reductions Associated with Placement of Homeless Persons with Severe Mental Illness in Supportive Housing.* Housing Policy Debate, 13(1), 107-163.
47 SCIE (2018) *A rapid evidence assessment of what works in homelessness services.* London: SCIE.
48 Pawson, H., Netto, G., Jones., C., Wager, F., Fancy, C. and Lomax, D. (2007) *Evaluating Homelessness Prevention.* London: Department for Communities and Local Government.
49 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis.

The common core elements of successful Housing Options approaches have been identified[50] as follows.

- **Enhanced housing advice** – aimed at helping households to gain access to, or to retain private or social rented tenancies. Housing advice work often includes liaison with private landlords. It may also have an outreach dimension targeted at vulnerable groups involving visits to Jobcentres, community centres, prisons and hospitals.
- **Private renting access (help to rent) schemes** – to help people who are homeless or at risk of homelessness to access and sustain a tenancy in the private rented sector. Schemes work with local private landlords to set up a tenancy and ensure it is sustainable for the tenant by providing ongoing support. Services provided might include helplines for landlords and tenants, inventory services pre- and post-tenancy, and financial support for tenants, such as a deposit guarantee. Tenants can also access Renting Ready training. This all helps to provide assurance to landlords and mitigate the risks that might otherwise be associated with letting to tenants with experience of homelessness or who are in receipt of benefits.[51]
- **Family mediation** – this tends to focus on preventing youth homelessness. Attempts are made to reconcile parents and young people to prevent eviction from the parental home. It can also facilitate young people's access to independent living.
- **Domestic abuse victim support** – this includes a range of interventions such as 'sanctuary schemes' (security measures to enable victims to remain in their own homes after exclusion of the violent partner). It can also involve support for planned moves and resettlement support.
- **Prison, hospital and other institution discharge arrangements** – this can involve physically locating staff in institutional settings, by establishing protocols to ensure people have a planned move into secure accommodation. It can also involve establishing Critical Time Interventions (CTIs) (see overleaf) to ensure a successful transition into housing.
- **Tenancy sustainment** – vulnerable tenants are offered support to retain their tenancies. Typically, help is provided with claiming benefits, budgeting, furnishing accommodation, accessing health and other services. Support, and where needed legal advocacy, can also be offered to mediate between landlords and tenants when problems arise, for example to help resolve issues with disrepair.
- **Housing association protocols** – at risk groups are identified with local housing providers, including those with rent arrears and those who might require intensive or Housing First approaches to maintain a tenancy.

These solutions were highlighted throughout the consultation undertaken to inform this plan as important elements of a successful homelessness prevention approach.[52]

50 Pawson, H. (2007) 'Local Authority Homelessness Prevention in England: Empowering Consumers or Denying Rights.' *Housing Studies*, 22(6) pp.867-883.
51 Crisis (2016) *For Help to Rent projects*. https://www.crisis.org.uk/ending-homelessness/housing-resource-centre/for-help-to-rent-projects/
52 Hughes, N. (2018) *Have your say policy consultation: summary report.* London: Crisis.

A successful Housing Options approach will operate to a 56-day timescale. It will use a personalised housing plan to set out the actions that the local housing authority and the household at risk of homelessness should take to prevent them from becoming homeless. As is already the case in England and Wales, this should be provided within the statutory framework.

The SCIE study identified some common barriers to successful prevention through a Housing Options approach. Limited access to affordable housing, either temporarily or as settled rehousing, is of course the major concern. So the potential of Housing Options approaches will rely heavily on overcoming these problems for homeless households.

Chapter 11 'Housing solutions' outlines the reforms necessary to meet the housing requirements of homeless households. Chapter 10 'Making welfare work' sets out the changes to Local Housing Allowance rates needed to ensure this housing is affordable.

The baseline success rates of statutory prevention services (via local authority Housing Options) are drawn from data in Wales. In 2016/17, almost two thirds (62%) of households assessed as 'threatened with homelessness' (5,718 of 9,210) had their homelessness successfully prevented.[53] A two-thirds success rate is reasonable to assume for households at immediate risk of homelessness. This is providing there is a consistent statutory duty for prevention across Britain with sufficient local authority funding, and that housing supply and welfare barriers are addressed.

Services for people leaving institutions

The most successful approaches to prevention are those that start as early as possible to identify people at risk of homelessness. It should not be left to local authority housing teams to start prevention work when people are at immediate risk (56 days). Those leaving institutions could have been assisted much earlier. Services within prisons, hospitals, asylum support services, local authority leaving care teams, and armed forces discharge teams must see homelessness prevention as a core part of their work.

CTI has worked across a variety of groups of people leaving state institutions. The evidence regarding its success is largely drawn from outside the UK, but reflects many elements of good practice seen in resettlement and move-on arrangements in this country.

Critical Time Intervention (CTI)

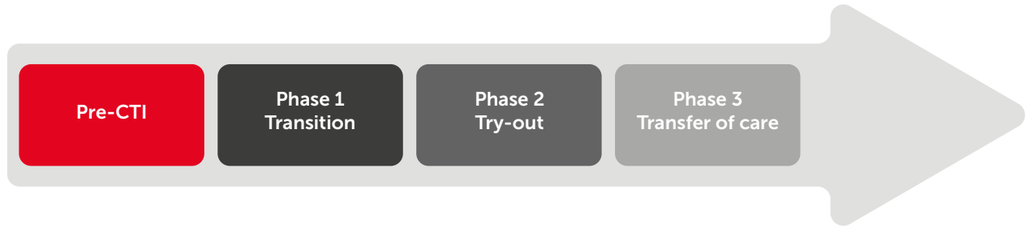
CTI is a time-limited evidence-based practice that supports people vulnerable to homelessness during periods of transition. CTI has been applied with armed forces veterans, people with mental illness, people leaving prison, and many other groups.[54] It is a housing-led approach providing rapid access to housing. It also features an intensive case management approach to address the particular needs of people once they have security of accommodation.[55]

53 National Statistics (2017) *Statistical First Release: Homelessness in Wales, 2016 -17. Cardiff*: Welsh Government.

54 Centre for the Advancement of Critical Time Intervention (2014) *CTI Model*. https://www.criticaltime.org/cti-model/

55 Benjaminsen, L. (2013) *Sustainable ways of preventing homelessness: Results from the Housing First based Danish Homelessness Strategy and the challenges of youth homelessness*. (Prepared for Peer Review in Social Protection and Social Inclusion programme) http://ec.europa.eu/social/main.jsp?langId=enandcatId=89andnewsId=1884andfurtherNews=yes

Figure 6.3: The Critical Time Intervention model



The CTI model (figure 6.3 above) is based on moving through clear, time-limited phases that are agreed and appropriate for the programme of support. A case manager will start to build a relationship while the individual is still in the institution, for example prison or hospital (or even emergency housing). At the point of transition into the community there are three distinct phases that are followed:[56]

- **Transition**
  This is the most intensive support phase. The case manager makes sure the practicalities of moving in to accommodation run smoothly, including setting up utilities, bills, and support to furnish a property.

  Emotional support is often also important, applying psychologically informed techniques to help someone stay motivated, and to avoid isolation. The case manager will often also act as a negotiator or mediator with neighbours, or with a landlord, helping to overcome any conflicts during the transition.

- **Try-out**
  At this stage, the case manager works less intensively with individuals, while still 'on call' to step back in should a crisis arise. This stage may still involve daily visits, but could be less intense, based on the needs of the individual.

  This period allows the case manager to assess how the person is settling into their accommodation and local community. Careful attention is paid to helping them access mainstream support services, such as drug and alcohol treatment and regular health appointments.

- **Transfer**
  The final stage is the transfer of care into the support systems that have been created. During this phase, there will be an explicit set of activities that solidify the support system that is in place. There should be a final meeting with all parties to allow reflection and ensure there is a planned ending to the client-worker relationship.

  CTI has been widely adopted in the US, and in various European contexts. In Denmark the success rate for service users who 'have been housed and maintained housing' is 95 per cent.[57]

56 Smith, A. (2017) *Could Critical Time Intervention work in England?* Fulfilling Lives Newcastle Gateshead. https://www.homeless.org.uk/connect/blogs/2017/jul/07/could-critical-time-intervention-work-in-england

57 Benjaminsen, L. (2013) *Sustainable ways of preventing homelessness: Results from the Housing First based Danish Homelessness Strategy and the challenges of youth homelessness*. (Prepared for Peer Review in Social Protection and Social Inclusion programme) http://ec.europa.eu/social/main.jsp?langId=enandcatId=89andnewsId=1884andfurtherNews=yes

It is an empirically proven model, and the SCIE study identified a number of contexts and groups of people leaving institutions for whom tenancy sustainment is significantly increased through CTI.[58] These included armed forces veterans, patients being discharged from hospital, young people, and prison leavers. Homeless Link in England has reported that CTI as a targeted approach 'could arguably be transferred to any vulnerable group'.[59]

In a domestic setting CTI is not dissimilar from many good models of resettlement and tenancy sustainment practice.

Factors that the SCIE study identified as critical to the success of CTI delivery, included consistent face-to-face contact with a case manager, and the security of housing offered.

Care leavers

Young people leaving care are at high risk of homelessness and often have associated problems relating to mental health, drug and alcohol abuse, criminality and employment.[60] One-third of care leavers experience homelessness in the first two years after leaving care.[61]

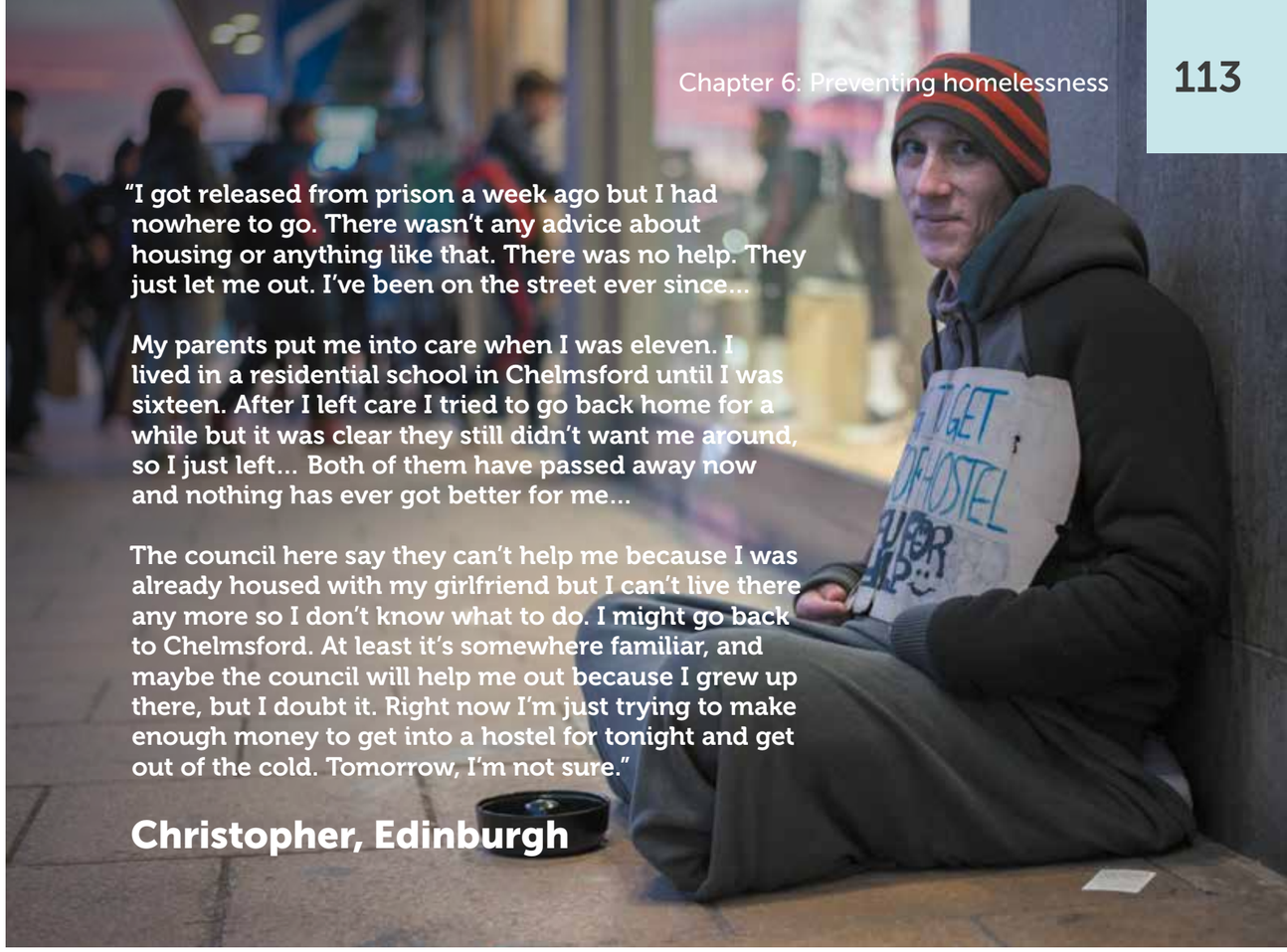
Care leavers are entitled to statutory homelessness support and to various on-going support arrangements from their local authorities. However, they also regularly report falling foul of systemic barriers such as 'intentional homelessness' or restrictions in accessing benefits.[62] In Scotland, more specific concern has been raised about care leavers spending too long living in unsuitable temporary accommodation.[63]

Evidence of what works to prevent young people exiting the care system into homelessness is relatively weak, given the regularity and prevalence of the problem. There is an urgent need to invest in evidence-based solutions, though good practical guidance is available.

Barnardo's and homelessness charity St Basil's have produced specialist guidance – an invaluable resource – for local authorities and housing providers working with care leavers at risk of homelessness.[64] It details a number of best practice examples, and provides a framework for improvements in local areas. The framework is based on some key principles, stating that young people leaving care are:

- given as much information, choice and control as possible
- able to make mistakes and never 'fall out' of the framework
- helped to succeed
- offered flexible support that adapts to meet their needs
- offered supportive and unconditional relationships
- the shared responsibility of their corporate parent.

58 SCIE (2018) *A rapid evidence assessment of what works in homelessness services*. London: SCIE.
59 Homeless Link (2015) *Preventing Homelessness to Improve Health and Wellbeing*. Homeless Link.
60 Homeless Link (2015) *Preventing Homelessness to Improve Health and Wellbeing*. Homeless Link.
61 Stein, M and Morris, M (2009) 'Increasing the Number of Care Leavers in 'Settled, Safe Accommodation.' *Research Review*, 3 . C4EO
62 APPGEH (2017) *All-Party Parliamentary Group for Ending Homelessness: Homelessness prevention for care leavers, prison leavers and survivors of domestic violence*. London: Crisis.
63 Crisis (2017) *A Life in Limbo — the use of prolonged unsuitable accommodation for homeless people in Scotland*. Edinburgh: Crisis.
64 Barnardo's (2014) *On my own: The accommodation needs of young people leaving care in England*. Barnado's.



The guide provides practical tips for avoiding homelessness among care leavers. It helps young people: successfully navigate Housing Options; choose accommodation before leaving care; manage any housing crisis that does occur, through use of short-term accommodation; arrange tailored support when in accommodation, and choose a longer term housing solution.

The corresponding guidance for Wales has been produced and published by Barnardo's Cymru and Shelter Cymru.[65]

Prison Leavers

Ex-offenders leaving prison often struggle to access accommodation either before, or after their release. This is not only because of difficulties getting new housing upon release, but also because people who had accommodation before their arrest can lose it while in custody.

Fifteen per cent of newly sentenced prisoners report being homeless before entering custody.[66] Of the approximate 66,000 prison leavers a year (England and Wales only) it is unclear how many experience homelessness upon release. However, the Prison Reform Trust reports that six in ten female prisoners have no home to go to upon release.[67] And in 2002 the Social Exclusion Unit reported that

65 Barnardo's (2015) *Care leavers accommodation and support framework*. Barnardo's.
66 Hewson, A. (2017) *Bromley Briefings prison factfile*. London: Prison Reform Trust.
67 Beresford, S, Earle, J and Litchfield, Z (2016) *Home truths: housing for women in the criminal justice system*. London: Prison Reform Trust.

a third of prisoners lose their home while in prison.[68] Latest figures for Scotland show that six per cent of homeless applicants (1,921 people in 2016/17) became homeless straight from leaving prison.[69]

Aside from CTI, there is no single evidence-based programme for the prevention of homelessness for prison leavers, although of course much good practice exists.

Housing-led solutions, coupled with specialist advice and preparation before release are solid principles of success. A good Housing Options approach will include this and will involve going in to prisons to prevent homelessness for people long before their release.

The St Giles Trust, a charity helping people facing severe disadvantage, operates a scheme to provide peer mentors in prison and community settings. The scheme provides tailored specialist advice and has shown strong success in improving access to and sustainment of housing.[70]

In Scotland, the Scottish Prison Service has produced the Sustainable Housing on Release for Everyone (SHORE) standards.[71] The SHORE standards are a multi-agency approach. They are specifically designed to ensure that 'people leaving prison can access services and accommodation in the same way as people living in the community.'

There is strong evidence that Housing First and CTI approaches not only resolve homelessness in the vast majority of cases, but also successfully reduce reoffending rates.[72] We strongly recommend that these housing-led approaches, including the key elements of the Housing Options approach described above, are scaled up across Great Britain to prevent homelessness for prison leavers.

Armed forces

As detailed in Chapter 2, the reduction in homelessness among armed forces veterans is a good example of public policy success. Data suggests that between 1994 and 2008 the percentage of homeless people from the armed forces has dropped from 25 per cent to six per cent.[73] More recent data from 2014, taken from a large sample of single homeless people across Great Britain, shows that this has reduced to three per cent.[74]

The reduction in veteran homelessness is a good example of responses to homelessness being co-ordinated across government departments, and not simply requiring local authorities to take responsibility. Veterans deemed vulnerable through leaving the armed forces became a 'priority need' group under homelessness legislation in 2002. At this time the Ministry of Defence also expanded

68 Social Exclusion Unit (2002) *Reducing re-offending by ex-prisoners*. London: Office of the Deputy Prime Minister.
69 National Statistics (2017) *Homelessness in Scotland: 2016/17, table 3*. Edinburgh: Scottish Government.
70 PwC (2016) *Creating social value and building social capital*. London: St Giles Trust.
71 Scottish Quality Standards. (2017) *Housing Advice, Information and Support for people in and leaving prison: Sustainable Housing Outcomes on Release for Everyone*. Edinburgh: Scottish Prison Service.
72 Quilgars, D. and Pleace, N. (2017) The Threshold Housing First Pilot for Women with an Offending History: The First Two Years Report of the University of York Evaluation. York: University of York; Jarrett, M., Thornicroft, G., Forrester, A., Harty, M., Senior, J., King, C., Huckle, S., Parrott, J., Dunn, G., Shaw, J. (2012) Continuity of care for recently released prisoners with mental illness: A pilot randomised controlled trial testing the feasibility of a Critical Time Intervention. *Epidemiology and Psychiatric Sciences*, 21(2), 187-193.
73 Johnson, S., Jones, A. and Rugg, J. (2008) *The experiences of Homeless Ex-Service Personnel in London*. University of York: Centre for Housing Policy.
74 Mackie, P. and Thomas, I. (2014) *Nations apart? Experiences of single homeless people across Great Britain*. London: Crisis.

its own 'pre-discharge resettlement service'.[75] This service requires those at risk of homelessness (and other vulnerabilities) to be assessed and for housing advice to be provided to people before leaving the armed forces.[76]

Despite such success there is a frustrating lack of evidence about how the reductions in veteran homelessness have been achieved. There are clearly good services and approaches to the issue but a lack of data about them. The SCIE study again identified CTI as an effective model for this group, referencing data from the US.[77]

Asylum support accommodation

The Home Office is responsible for supporting people while their asylum claims are processed, including providing housing. Asylum seekers are, by virtue of their circumstances, at a high risk of destitution and homelessness.

The transition from asylum support accommodation has become a cliff-edge of homelessness. Like the prison system or hospital discharge, the state withdraws responsibility and assistance at an arbitrary point. This is regardless of whether alternative accommodation has been secured or homelessness prevented.

75 Mackie, P. and Thomas, I. (2014) *Nations apart? Experiences of single homeless people across Great Britain*. London: Crisis.
76 Ministry of Defence (2015) 'Tri-service resettlement and employment support manual.' *Joint Service Publication (JSP)* 534, Issue 14
77 SCIE (2018) *A rapid evidence assessment of what works in homelessness services*. London: SCIE.

If asylum seekers are given a positive decision on their application, newly recognised refugees have 28 days before their support is cut off and they are forced to leave their accommodation. Twenty-eight days is too short and does not give people the time they need to access financial support and housing.

This is exacerbated by the delays many people experience in receiving the documents they need to register for welfare support, open a bank account and access housing. The lack of support they experience is in stark contrast to the support provided to refugees who come to the UK through one of the government-led resettlement schemes. They are provided with accommodation and receive support to access services and find employment.

Chapter 14 'Homelessness data', describes the data available about the nature and extent of the problem. Very little published data is available. Although in London we know that 2.6 per cent of rough sleepers, 74 people at the last count, reported that their last settled base was asylum support accommodation.[78]

There are examples available of schemes to host and support migrant homeless people,[79] but there are no evidence-based interventions to reference for this group.

Hospital discharge

'Homeless people in the UK don't die from exposure. They die from treatable medical conditions.'

Dr Nigel Hewitt, Medical Director, Pathway[80]

Effective homelessness prevention within NHS care is both an opportunity to deal with housing issues and with medical conditions. There are a range of such opportunities regularly associated with hospital discharge, from short-term accident and emergency care, through to longer-term psychiatric care admissions.

Homeless Link reported in 2014 that more than 36 per cent of homeless people were discharged from hospital onto the street, without underlying health problems or housing being addressed.[81] This is corroborated by reports from NHS staff that they have little understanding of how to deal with the housing needs of homeless patients.[82] As with prison, homelessness can also occur while people are detained/admitted; this also presents an opportunity for immediate action.

In November 2017 *The Lancet* published a major review of what works to prevent and relieve homelessness and provide effective treatment for homeless people.[83] The review points to the success of case management approaches such as CTI:

'In homeless populations, case management was associated with improvements in mental health symptoms and substance use disorders compared with usual care. Case management with assertive community treatment (multidisciplinary team with low caseloads, community-based services, and 24hr coverage) reduced homelessness, with a greater improvement in psychiatric symptoms compared with standard case management for the treatment of homeless people with severe mental illness'.

Once again this points towards the need for tailored and intensive case management, but this time in a health setting. This kind of intervention has much in common with the Pathway model, which has been developed in English hospital settings. It involves a specialist case management approach that includes medical interventions alongside housing and other advice.[84]

The Lancet review echoes the findings of the evidence assessment in the SCIE study, in also pointing to the strong evidence base for housing-led solutions.

A review of homelessness prevention in health settings from Homeless Link also highlights the success of housing-led approaches. It points to the success of immediate rehousing alongside financial assistance and on-going support. This has been shown to be particularly successful for planned discharge from psychiatric units.[85] The same study once again points to the success of CTI for this group.

The National Institute for Health and Care Excellence (NICE) has also published useful guidance on improving the transitions for people with social care needs (including homeless people) leaving hospital.[86]

As with agencies responsible for the groups above, the NHS in each nation must assume responsibility for homelessness prevention to achieve successful transition and discharge. Time and again the evidence of what works includes active discharge planning within the health system. While this might require rapid access to settled accommodation, it cannot be left to housing agencies and local authorities who themselves cannot plan and deliver a successful exit from healthcare.

In Scotland, statutory guidance for Health and Social Care Integration Authorities was published in 2015.[87] It sets out their responsibilities relating to housing and requires them to work closely together on improving outcomes for homeless households. It is not clear whether this has positively affected the prevention of homelessness in Scottish healthcare settings, but it is a clear and welcome statement of intent from the Scottish Government.

Similarly, the 2015 Welsh Government NHS 'Standards for Improving the Health and Wellbeing of Homeless People and Specific Vulnerable Groups',[88] sets out expectations for joint working between housing and health settings to improve outcomes for homeless people.

78 Greater London Authority (2017) *CHAIN annual report: Greater London 2016/17.* Greater London Authority.
79 Homeless Link (2017) *Resources for supporting migrants who become destitute*. https://www.homeless.org.uk/our-work/national-projects/strategic-alliance-on-migrant-destitution/resources-for-supporting
80 Pathway (2018) *Pathway Services*. http://www.pathway.org.uk/about-us/
81 Homeless Link (2014) *The unhealthy state of homelessness: Health Audit Results 2014*. Homeless Link.
82 Hewitt, N., Halligan, A., and Boyce, T. (2012) 'A general practitioner and nurse led approach to improving hospital care for homeless people.' *British Medical Journal* 2012;345:e5999
83 Luchenski, S. et al. (2017) 'What works in inclusion health: overview of effective interventions for marginalised and excluded populations.' *The Lancet*, Volume 391, Issue 10117, 266 – 280.
84 Pathway (2018) *Pathway Services*. http://www.pathway.org.uk/about-us/
85 Homeless Link (2015) *Preventing Homelessness to Improve Health and Wellbeing*. London: Homeless Link.
86 National Institute for Care Excellence (2015) T*ransition between inpatient hospital settings and community or care home settings for adults with social care needs (NICE guideline [NG27])*.
87 Scottish Government (2015) *Housing Advice Note*. Edinburgh: Scottish Government.
88 Welsh Government (2013) *Standards for Improving the Health and Wellbeing of Homeless People and Specific Vulnerable Groups*. Cardiff: Welsh Government.

Domestic abuse

The intersection of homelessness and domestic abuse is complex. Many survivors of abuse leave their housing to escape a dangerous partner. Others are evicted from housing due to a perpetrator's behavior, such as damaging property, or failing to pay rent. In some cases, once the perpetrator is removed or evicted, the victim of abuse must also have to leave because the housing is no longer affordable. Similarly, a survivor may be unable to pay rent because of actions taken by an abusive partner.

In 2015/16, 6,550 people were accepted as homeless in England by their local authority because of a violent relationship breakdown. This accounts for 11 per cent of all homeless acceptances.[89] In Scotland, the latest figures report 12 per cent of homeless applications were as a result of a violent/abusive dispute.[90] In Wales, 2016/17 data shows that 11 per cent of homeless acceptances were due to a person fleeing or being at risk of domestic abuse.[91]

Our *Nations Apart* research from 2014 found that 61 per cent of homeless females and 16 per cent of homeless males across Great Britain had experienced violence and/or abuse from a partner.[92] Half of St Mungo's female clients have experienced domestic violence and one third state that domestic violence contributed to their homelessness.[93]

An All Party Parliamentary Group on Ending Homelessness (APPGEH) inquiry heard harrowing evidence from abuse survivors failed by housing agencies when at risk of homelessness.[94] Common problems experienced by survivors include the need to prove 'vulnerability' as a result of experiencing abuse, and having to demonstrate a 'local connection' to access services.

Scottish Women's Aid reported some similar issues in Scotland,[95] despite a strong legal safety net and code of guidance for local authorities. In particular, the report highlights a lack of understanding about domestic abuse and its impacts among Housing Options staff.

Homelessness prevention for survivors of domestic abuse must be tailored to the needs and choices of people involved. There are some common approaches to providing help, but no identified programmes with a strong evidence base.

Sanctuary schemes offer survivors help to remain in their home. They provide additional security measures within the home, with details provided to local police to ensure the fastest possible response should further abuse take place.[96] The SCIE study found some evidence of the effectiveness of sanctuary schemes, alongside cost-saving data.[97]

89 Ministry of Housing, Communities and Local Government (2017) *Prevention and relief live tables: October to December 2017*, Table 774.
90 National Statistics (2017) *Homelessness in Scotland: 2016/17*. Edinburgh: Scottish Government.
91 Statistics for Wales (2017) *Homelessness in Wales, 2016-17*. Cardiff: Welsh Government.
92 Mackie, P. and Thomas, I. (2014) *Nations apart? Experiences of single homeless people across Great Britain*. London: Crisis.
93 Hutchinson, S., Page. A., andSample, E. (2014) *Rebuilding Shattered Lives Report*. London: St Mungo's
94 APPG for Ending Homelessness (2017) *The APPG for Ending Homelessness Inquiry Session, 'How to prevent survivors of domestic violence from becoming homeless?* London: Crisis.
95 Scottish Women's Aid and Fife Domestic and Sexual Abuse Partnership (2015) *Change, justice, fairness: "Why should we have to move everywhere and everything because of him?"*. Fife Council.
96 Shelter (2007) *Homelessness prevention and sanctuary schemes*. London: Shelter.
97 SCIE (2018) *A rapid evidence assessment of what works in homelessness services*. London: SCIE.

"I've been homeless three different times in my life. The most recent time a previous partner wanted things from me that I was not willing to do. But he kept trying to force and force and force things and I just said no, no more, and he went, 'Well then, just f-off, just get out my house'.

So I had one shoe on my foot and he just kicked me out the door. And in that house was my child, and all my belongings.

I had nowhere to go, I didn't know anybody, and the only place I did know was a church. I went straight there and within a day they put me in touch with an organisation that runs a house for homeless people, and they helped change my world.

I want to help and influence people through what I've done, what I've had to suffer with in my life, the journeys I've been on, and I'm sure loads of people out there have been on those journeys, and they just want a bit of confirmation that they're not alone and things will get better."

Lauren

(Not her real name)

Provision of refuges has been a traditional approach to assisting people escaping domestic abuse and relieving one of the most acute forms of homelessness. This kind of emergency accommodation is often the immediate response to provide safety away from a perpetrator. There is no one model of refuge provision, and they can range from individual units of self-contained housing to congregate buildings more akin to hostels.

The APPGEH inquiry into homelessness and domestic abuse heard evidence of some innovative practice at local authority and housing association level. These included schemes to provide reciprocal access to housing for survivors of abuse across local boundaries. Other evidence included housing associations seeking to identify people at risk of homelessness and abuse through their own property management and training of staff.[98] Once again this shows how homelessness prevention can and should be started well before issues reach a local authority housing team.

98 Domestic Abuse Housing Alliance (2017) *DAHA Accreditation*. https://www.dahalliance.org.uk/accreditation

In Wales, the recent *Renting Homes (Wales) Act (2016)* enables a joint tenant, who is a perpetrator of abuse, to be removed from the joint tenancy without the joint tenancy failing. This allows the survivor of abuse to remain in the home.

Preventing youth homelessness

Youth homelessness charity Centrepoint recently published the results of a systematic review of the evidence on approaches to youth homelessness prevention.[99] The report highlights the diversity of services aiming to prevent youth homelessness and many examples of good practice.

Four key principles were identified as important in successfully preventing youth homelessness. Each was seen as a common theme in the available evidence. These were:

- **multi-agency working**, to ensure all agencies coordinate to identify and respond to young people at risk
- **a 'single front door'** approach, to ensure young people have a consistent and reliable place to access everything they need, and to ensure they are not passed between services
- **a whole family approach** that responds to the breakdown of family relationships as a key driver of youth homelessness
- **positive professional relationships** that help young people build trust, resilience and self-esteem.

In 2007, a UK-wide review of youth homelessness provision reported positive results in the burgeoning Housing Options approach.[100] Then, as is the case now, it was seen as crucial that local authority responses focused heavily on mediation approaches with families. And if necessary, an alternative source of secure housing should be available for young people. The mediation may be best delivered by a third party, rather than the local authority, ensuring that any vested interest in the young person returning home is avoided.

Much of this approach is reflected in the St Basil's Positive Pathway model,[101] which 66 per cent of local authorities in England report using or developing.[102] The Positive Pathway brings together evidence of good practice, and outlines how agencies should work together in an integrated way.

It aims both to prevent homelessness and to promote a range of housing options to ensure a planned move for young people leaving care or the family home. A recent evaluation of the Positive Pathway model, demonstrates, that it results in improved service provision, better use of resources, and better outcomes for young people.[103]

The 2009, House of Lords 'Southwark Judgement'[104] obliged children's services to provide accommodation and support to homeless 16 and 17 year olds. It also shone a light on the need for better commissioning between local authority children's services and housing departments.

Immediate access to alternative accommodation is often provided through the 'Nightstop' approach. This is an emergency housing provision in private homes whose residents/families have been carefully vetted and approved by homelessness agencies.[105] The approach has marked success in preventing rough sleeping for young people, and shows promising evidence about the ability of people to move on positively.[106]

All these elements add up to a good body of knowledge about how to help young people at risk of homelessness, but further evaluation and innovation is crucial. As the Centrepoint research states: 'robust evidence is urgently needed'.[107]

Two notable examples of emerging evidence and innovation are below.

- Housing First for Youth is a promising innovation in prevention of youth homelessness.[108] It is an adapted model of the original Housing First approach, currently being trialed in Ireland, Scotland and Canada. The model introduces additional elements to support young people, including life and independent living skills. It also focuses on maintaining good relationships with family connections, and on community integration to address issues of isolation for young people. In Scotland, the approach is being piloted specifically with care leavers.[109]
- Also of interest is the primary prevention work among school age young people at risk of homelessness in Australia. The Geelong Project[110] is groundbreaking in its approach. School age children are surveyed to identify risk factors associated with homelessness, and then those young people and their families are connected with prevention programmes in the community. The project evaluation shows a 40 per cent reduction in youth homelessness over three years. A pilot of the same approach is currently happening in Ontario, Canada.[111]

99 Centrepoint (2016) *Preventing Youth Homelessness: What Works*. Centrepoint.
100 Quilgars, D., Johnsen, S. and Pleace, N. (2008) *Youth homelessness in the UK*. Joseph Rowntree Foundation
101 St Basil's (2015) *Developing Positive Pathways to Adulthood*. St Basil's.
102 Homeless Link (2018) *Young and Homeless 2018*. Homeless Link.
103 Green, S., McCarthy, L. and Pattison, B. (2017) *The Positive Pathway Model: A Rapid Evaluation of its Impact*. Sheffield Hallam University: Centre for Regional Economic and Social Research.
104 Ministry for Housing, Communities and Local Government and Department of Education. (2018) *Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation*. London: MHCLG and DoE.

105 Depaul (2018) *Nightstop UK*. https://uk.depaulcharity.org/NightstopUK
106 Insley, E. (2011) *Staying Safe: An Evaluation of Nightstop Services*. Depaul.
107 Centrepoint (2016) *Preventing Youth Homelessness: What Works*. Centrepoint.
108 Gaetz, Stephen. (2017) *THIS is Housing First for Youth: A Program Model Guide*. Toronto: Canadian Observatory on Homelessness Press.
109 Scottish Housing News (2017) *First youth 'Housing First' project launched in the UK*. http://www.scottishhousingnews.com/17582/first-youth-housing-first-project-launched-in-the-uk/
110 The Geelong Project (2018) *Homepage*, http://www.thegeelongproject.com.au
111 Raising the Roof (2018) *What we do*, http://www.raisingtheroof.org/what-we-do/our-initiatives/the-upstream-project/

6.5 Collecting and recording data

Data relating to homelessness prevention activities in local authorities is recorded in each country, though in different ways and to varying standards across England, Scotland and Wales.

England

In 2009, local authorities in England started recording data on people who approached for assistance outside of the statutory framework. They also record how local authorities help people resolve their homelessness before a formal homelessness application has taken place. Referred to as 'prevention and relief activity' the statistics show to some extent 'successful' prevention action and how this has changed over time. For example, help to prevent homelessness through resolving Housing Benefit problems has increased fourfold since 2010/11.[112]

It is useful to report on the type of prevention and relief activity that local authorities are using. But there is currently no way of assessing the effectiveness of these interventions, the quality of the service provided and the sustainability of the outcomes for households approaching them for assistance.

The prevention and relief statistics are also not able to eliminate duplication when households receive more than one prevention and relief activity within the year. They do not cross reference with the local authority statutory homelessness returns, which would allow double counting to be removed. These data were deemed by the UK Statistics Authority in 2015 to fall short of the standard required for 'national statistics'.[113]

The Homelessness Reduction Act (2017) has prompted the introduction of a new system for local authorities to record prevention and relief data, called 'H-CLIC'. This is due to report in July 2018 and will provide information about all households owed a prevention duty including reasons why the prevention duty has ended.

Scotland

In Scotland, homelessness statistics are collected so that each person has a unique identifying number. This allows local authorities to track households/individuals through the homelessness system and can help identify if they have been homeless before. Local authorities are able to understand how many households made a unique application for homelessness assistance. The system also stops double counting and reports the proportion of households making a repeat application after receiving help. Collecting this 'HL1' data is compulsory for local authorities, who must do so from anyone they have reason to believe is homeless (or will be in 56 days).

In 2014 the 'PREVENT1' statistics were introduced in Scotland to record housing options activity. This system is fragmented because homelessness prevention sits outside the statutory system. Also, much of the prevention work that happens both within authorities, and more widely via other agencies and housing providers, is in places with no access to the database.

112 Ministry of Housing, Communities & Local Government (2017) *Prevention and relief live tables: October to December 2017,* Table 789

113 UK Statistics Authority (2015) *Statistics on Homelessness and Rough Sleeping in England.* London: UK Statistics Authority.

The ability to link both datasets is useful to measure an overall homelessness caseload figure, though there is varied practice in how these are recorded across local authorities.[114]

Wales

The Housing (Wales) Act (2014) also brought changes to statutory homelessness statistics in Wales. Statistics are now collected in relation to the number of outcomes, and not by household. This makes it difficult to use the data for some statistical purposes, particularly in attributing the overall homelessness need across the country.

The Welsh system means that each household could have up to three outcomes: prevention; help to secure accommodation (relief); and duty to secure accommodation (discharge). Data is collected on the type of prevention activity used but, similar to the English data, households are not followed through the system. This means there is no way of understanding the proportion of households who experience repeat homelessness and become homeless again after a prevention outcome. Consequently it is difficult to measure the effectiveness of prevention measures.

Data linkage

One further development in the Scottish statutory homelessness statistics is data linking between HL1 and health service data, originally trialled in Fife.[115] This approach has the potential to revolutionise our understanding of what works to achieve positive outcomes for homeless people across public services.

Data linkage and tracking people through homelessness datasets, across Great Britain and in all public services data sets, would show how well (or otherwise) services are meeting the needs of homeless people. It would also show the cost effectiveness of interventions including prevention measures. In the US and Denmark data linkage has been used for some time to explore patterns of service use and the cost associated with them.[116]

In Wales, a four-year data linkage study into the Supporting People programme is running from 2016 and 2020.[117]

Large scale data merging across Britain could facilitate the cost effectiveness of services such as Housing First and CTIs, and explore how to improve prevention services and their integration across statutory services.

Data linkage is vital to fully understand how homeless services meet the needs of homeless people and we strongly recommend expanding and replicating existing successful models of linking data across homelessness, health, criminal justice and other relevant services.

114 Mackie, P. and Thomas, I. (2015) *Single Homelessness in Scotland.* London: Crisis.

115 Scottish Government. *Health and Homelessness Data Linkage.* http://www.gov.scot/Topics/Statistics/Browse/Housing-Regeneration/RefTables/HealthHomelessnessDataLinkage

116 Pleace, N. and Culhane, D.P. (2016) *Better than Cure? Testing the case for Enhancing Prevention of Single Homelessness in England.* London: Crisis.

117 Welsh Government (2017) *Supporting People data linking project.* https://gov.wales/statistics-and-research/supporting-people-data-linking-project/?lang=en

Table 6.2: Common scenarios where homelessness can be prevented

Scenario	Agencies
Person leaves prison with no available accommodation	• Prison • Community Rehabilitation Company/ Criminal justice social work (Scotland)
Person or household flees their home to escape domestic abuse from a known perpetrator	• The police
Household leaves Home Office Asylum Support accommodation, following an asylum claim decision	• The Home Office
Young person leaves the care system	• Local authority children's services
Person is served an eviction notice from a registered social landlord	• Housing association or other social housing provider
Person is discharged from a psychiatric unit or other in-patient stay, following treatment	• NHS hospital • GP • Local authority adult social care
Person is discharged from residential detox or rehabilitation unit	• Local authority adult social care

6.6 Who is responsible for prevention?

The case for fully expanding measures to prevent homelessness is overwhelming in both financial and human terms. The political agenda to prevent homelessness is strong, and still growing.

Lead responsibility for prevention sits with local authority housing teams in England and Wales, with duties to help prevent homelessness set out in law. The picture is similar in Scotland, but on a non-statutory footing. There are inherent problems in this settlement of responsibility.

The actions required to prevent homelessness will be most effective when delivered at the earliest opportunity. By the time a household presents for assistance at a local authority housing team it is likely that opportunities have been missed to resolve the issue. Indeed, in the case of people leaving institutions, some people will no longer be at risk of homelessness, but already experiencing it.

Above are some common scenarios, alongside details of the agencies with the knowledge and ability to help prevent homelessness. In each of these scenarios, at least one agency or organisation is aware in advance of homelessness that the person or household is at risk. Yet the lead responsibility for homelessness prevention falls to local authority housing officers who may have no idea that it is required until it is too late.

Local authority prevention strategies should of course ensure close relationships with other local agencies, but there is nothing to compel them to cooperate in prevention strategies or individual cases. Significantly, people from all sectors – including health, social services, DWP, criminal justice and education – who participated in the extensive consultation to inform this plan, reported that joined-up working is critical in preventing homelessness.[118]

Close partnership working between different sectors was also highlighted as important by participants with experience of homelessness. They emphasised it would ensure people do not fall through the cracks of the system.[119]

Another problem with sole local authority responsibility is that financial rewards for preventing homelessness – eg reducing crime or hospital admissions – often do not benefit the authority. Consequently, there are concerns that if the local authority sees no financial incentive, they may not prioritise prevention activity – particularly in the light of reduced budgets.[120] This can especially affect non-priority households, or people without a local connection, for whom that authority will not owe a full duty for rehousing.

To counter these disincentives and the overall lack of co-ordination, a change in legislation is needed. As set out in Chapter 13 'Homelessness legislation', a new duty to prevent homelessness, and to cooperate with local housing authorities in relieving homelessness, should be extended to relevant public bodies. This is in addition to the existing duties on local housing authorities in England and Wales to prevent homelessness (which are also recommended for Scotland).

Such an approach would be bolstered by truly cross-government strategies to end homelessness in the three nations.

6.7 What needs to change?

This section sets out the necessary changes in policy across all three nations. Actions for government in each nation are set out at the end of this chapter.

1. Prevention legislation

To ensure Housing Options is delivered on a stable and consistent footing, it must be brought into the statutory homelessness framework across Great Britain.

Local housing authorities should have a statutory duty to prevent homelessness for all households who are at risk of becoming homeless within 56 days. This duty is already in place in England and Wales.

A mandated set of activities that local authorities should have available to them to help prevent and relieve homelessness should be set out in secondary legislation. This should include:

- enhanced housing advice
- private renting access schemes
- family mediation
- domestic abuse victim support
- prison, hospital and other institution discharge arrangements
- tenancy sustainment support
- housing association protocols.

118 Hughes, N. (2018) *Have your say policy consultation: summary report*. London: Crisis.
119 Crisis, Groundswell and Uscreates (2018) *The lived experience of homelessness*. London: Crisis.
120 Busch-Geertsema, V. and Fitzpatrick, S. (2008) 'Effective Homelessness Prevention? Explaining Reductions in Homelessness in Germany and England.' *European Journal of Homelessness*, 2: Page 69-95.

This duty should apply to all households at risk of homelessness within 56 days, regardless of priority status, local connection, intentionality or migration status.

The duty should set out a balance of responsibilities, recognising that there is likely to be a role for the applicant themselves, local authorities and other public services in successfully preventing homelessness.

There should also be a duty on all relevant public services and agencies to prevent homelessness. As detailed above, other public services will often be aware that someone is at risk of homelessness and have opportunities to help prevent their homelessness, well before they approach a local authority housing team. Placing a duty to prevent homelessness on other public services is critical to ensure that homelessness is prevented for as many households as possible.

2. Ending homelessness for people leaving state institutions

CTI should form a key part of national strategies to prevent and end homelessness for groups most at risk of homelessness. This model has been shown to work to successfully prevent homelessness across a variety of groups of people leaving state institutions. CTI should be implemented at scale to prevent homelessness for care leavers, prison leavers, people leaving the armed forces, people leaving asylum support accommodation and people being discharged from hospital.

3. Funding

Sufficient funding is vital to ensure prevention measures are commissioned and successful. Allocations to local authorities should be set out on a long-term and stable basis. Where necessary, other agencies responsible for prevention action should have access to additional funds.

4. Evidence-based practice

The Centre for Homelessness Impact should be commissioned to fill gaps in evidence relating to homelessness prevention for people at immediate risk, and for groups in proven need of prevention services.

Trials of new methods of preventing homelessness are likely to be needed – especially to prove the effectiveness of housing-led and intensive case management approaches in the UK. The highest standards possible of trialling and evidence collection should be used. The evidence gaps for preventing youth homelessness and homelessness for people who experience domestic abuse are particularly important.

This robust evidence will help local authorities and other relevant agencies commission services more confidently, and plan for successful outcomes.

5. Data collection and linkage

Data linkage is vital to fully understand how homeless services meet the needs of homeless people. It has the potential to demonstrate the effectiveness and the cost distributions of interventions across the homelessness, health, criminal justice, and welfare systems.

To establish data linkage, gaps in the use of, and access to, data sets across health, homelessness, housing, criminal justice, substance misuse, welfare benefits and employment services must be addressed. Where data linking exists on a small scale or for specific groups (for example in Scotland using 'HL1' and hospital admissions data) it needs to be expanded and replicated.

The lack of data on outcomes and success of prevention also needs to be rectified. This can be achieved by introducing a data system that tracks households at every point in their journey. It should also have the ability to record success or failure of prevention through linking to other homelessness data sets.

Such changes must be done in tandem with a national outcomes framework or equivalent. This will allow the comprehensive tracking of the quality, outcomes and effectiveness of homelessness services for individual people. Commissioning decisions and the effectiveness and cost of services will be properly informed as a result.

Recommendations for improved data collection and linkage are set out in full in Chapter 14.

6. Telling a better story – homelessness prevention

As described above and in Chapter 4, the homelessness sector does not always communicate effectively about prevention.

As experts in the sector, we agree that prevention strategies are essential in tackling homelessness. However, most of our communications emphasise the need for short-term and emergency responses. We fail to describe the opportunities to prevent homelessness in the stories we tell.

In this context, it is no surprise that public attitudes to homelessness are fatalistic. They see the problem as inevitable, and do not recognise prevention as a solution. As a sector, if we want policy choices and investment in prevention, we must assume responsibility for generating positive public responses that will back these political choices.

In order to activate public understanding and support for preventative action on homelessness, evidence from the FrameWorks Institute[121] tells us that the homelessness sector needs to communicate differently. They have widely tested what it might take to improve public responses to homelessness, including how to activate public support for prevention.

The FrameWorks research strongly recommends we communicate stories of homelessness and its impact using a 'common experience' frame. A combination of messages, values and stories make up this frame and together they do three important jobs.

First, they highlight our fundamental commonalities – showing that homeless people are human beings and members of society, and not somehow 'other'.

Second, they communicate the experience of what it is like to be homeless.

And third, they explain how homelessness happens and how systemic solutions can help.

The frame combines these elements. It is crucial that they are used in combination with each other. This is because using one element alone will not be effective and may undermine the attempt to reframe the issue.

Chapter 4 explains these and other proposed changes in detail. Crisis is committed to implementing these in our public-facing materials, and to working alongside the wider homelessness sector to do so. It is clear from the evidence that these changes would allow a more honest account of the preventative solutions proposed in this chapter.

6.8 Wider reforms

Wider reforms are also necessary to allow for successful interventions.

- The lack of affordable and available alternative accommodation is the most fundamental barrier to successful prevention (and is itself a major cause of homelessness). Chapter 11 sets out the housing interventions necessary to address the shortfall in accommodation for homeless people.

- In many areas of Britain, Local Housing Allowance is insufficient to pay for available accommodation. This is a critical barrier to preventing homelessness. Chapter 10 sets out recommendations necessary to resolve this.

- The loss of a tenancy in the private rented market is the leading cause of homelessness in England,[122] and a problem across Britain. The insecurity people experience in the market both causes homelessness and inhibits attempts to resolve it. Recommendations for longer tenancies and greater security in the private rented sector are set out in Chapter 11.

- Migrant homeless people are currently shut out of most homelessness assistance. Restrictions are placed upon accessing the housing market, paid employment, access to benefits and the statutory homelessness system. Chapter 12 'Ending migrant homelessness' unpicks the complex web of rules that both create and sustain migrant homelessness, and sets out the reforms necessary to reverse this 'hostile environment'.

- In addition to placing prevention services on a statutory footing, there are wider changes necessary to homelessness legislation that will assist local authorities and others in effective prevention. Chapter 8 'Ending rough sleeping' sets out the necessary changes, including prevention of rough sleeping, and an end to arbitrary distinctions of 'priority' homelessness across Great Britain.

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

6.9 Conclusion

This chapter has highlighted a number of key strengths within the three homelessness systems across Great Britain. It is clear that the value of intervening early to prevent homelessness is an accepted and agreed aim both politically and among service providers. The Housing Options approach, applied in a flexible and person-centred way, is known to work and should be the cornerstone of local authority prevention.

Standing in the way of a complete and effective approach to prevention are a number of clear issues. Each demands a policy response. The legal entitlements to prevention assistance are making a positive difference in Wales. They need to be extended, effectively funded and bolstered with the integrity of good data.

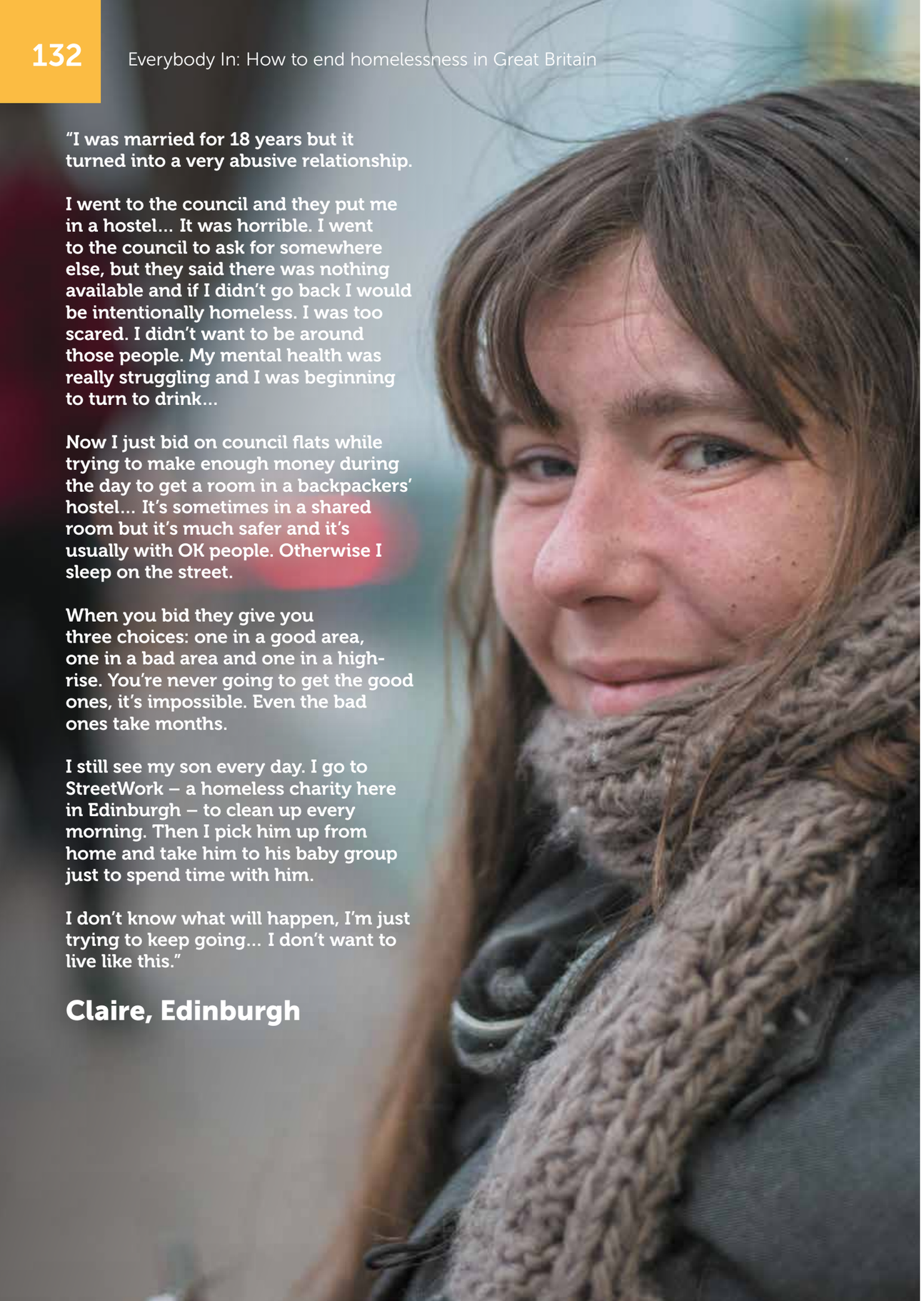
Homelessness prevention must become the business of a range of public services. This will require cross-government reforms and crucially the large-scale deployment of programmes such as CTI.

Prevention could and should be the first and most important element of a strategy to end homelessness. But it will only be possible with the reforms outlined above in place and an active agenda to improve the evidence of what works for different groups and circumstances.

122 Ministry of Housing, Communities & Local Government (2017) *Prevention and relief live tables: October to December 2017,* Table 774

6.10 Summary of recommendations

England/Westminster	Scotland	Wales
• Set out in secondary legislation a mandated set of activities that local authorities should have available to them to help prevent and relieve homelessness • Place a duty on all relevant public bodies to prevent homelessness • Ensure that Critical Time Interventions form a key part of national strategies to prevent and end homelessness for groups most at risk, such as people leaving state institutions • Ensure that sufficient funding is available for all the necessary prevention measures, as set out above • Commission the Centre for Homelessness Impact to fill gaps in evidence relating to homelessness prevention for people at immediate risk, and for groups at particular risk of homelessness • Establish data linkage systems that include data sets across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services • Redesign statutory homelessness data collection so that it follows individuals through their journey within the homelessness system – this must include data on the outcomes and success of prevention	• Introduce a statutory duty to prevent homelessness for all households who are at risk of becoming homeless within 56 days, regardless of priority status, local connection, intentionality or migration status • Set out in secondary legislation a mandated set of activities that local authorities should have available to them to help prevent and relieve homelessness • Place a duty on all relevant public bodies to prevent homelessness • Ensure that Critical Time Interventions form a key part of national strategies to prevent and end homelessness for groups most at risk, such as people leaving state institutions • Ensure that sufficient funding is available for all necessary prevention measures, as set out above • Commission the Centre for Homelessness Impact to fill gaps in evidence relating to homelessness prevention for people at immediate risk, and for groups at particular risk of homelessness • Establish data linkage systems that include data sets across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and • Ensure that data on the outcomes and success of prevention is included in statutory homelessness data collection	• Place a duty on all relevant public bodies to prevent homelessness • Ensure that Critical Time Interventions form a key part of national strategies to prevent and end homelessness for groups most at risk, such as people leaving state institutions • Ensure that sufficient funding is available for all necessary prevention measures, as set out above • Commission the Centre for Homelessness Impact to fill gaps in evidence relating to homelessness prevention for people at immediate risk, and for groups at particular risk of homelessness • Establish data linkage systems that include data sets across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services • Redesign statutory homelessness data collection so that it follows individuals through their journey within the homelessness system – this must include data on the outcomes and success of prevention



"I was married for 18 years but it turned into a very abusive relationship.

I went to the council and they put me in a hostel... It was horrible. I went to the council to ask for somewhere else, but they said there was nothing available and if I didn't go back I would be intentionally homeless. I was too scared. I didn't want to be around those people. My mental health was really struggling and I was beginning to turn to drink...

Now I just bid on council flats while trying to make enough money during the day to get a room in a backpackers' hostel... It's sometimes in a shared room but it's much safer and it's usually with OK people. Otherwise I sleep on the street.

When you bid they give you three choices: one in a good area, one in a bad area and one in a high-rise. You're never going to get the good ones, it's impossible. Even the bad ones take months.

I still see my son every day. I go to StreetWork – a homeless charity here in Edinburgh – to clean up every morning. Then I pick him up from home and take him to his baby group just to spend time with him.

I don't know what will happen, I'm just trying to keep going... I don't want to live like this."

Claire, Edinburgh

Chapter 7:

Rapid rehousing

We can't prevent all cases of homelessness, so when people do lose their homes they need a rapid response to find somewhere safe and secure to live. This means mainstream accommodation – in houses and flats in ordinary communities.

By protecting all households from homelessness through the law, and by using effective rapid rehousing methods, we can ensure no one is left living in emergency accommodation.

With sufficient housing, legal reform, and other bold policy choices, rapid rehousing will be crucial in ending homelessness.

7.1 Introduction

Wherever possible homelessness should be prevented. Person-centred, timely solutions make this feasible (see Chapter 6 'Preventing homelessness'). If homelessness cannot be avoided it should be rare, brief and non-recurring. Rapid rehousing approaches, within a housing-led system, are critical in making this happen.

A housing-led system provides stable, appropriate accommodation and any necessary support as quickly as possible to people who are homeless or at risk of it.

This housing-led approach, when properly applied, means the need for many forms of interim accommodation will diminish. However, some emergency temporary accommodation will always be necessary for people in immediate need.

This chapter applies the following key elements of rapid rehousing.

- It is a housing-led approach that focuses on helping people into permanent accommodation before addressing any other issues they may need support with.
- A fundamental goal is to reduce the amount of time a person is homeless.
- Rapid rehousing also helps homeless people with lower or no support needs, and in doing so can prevent complex needs or chronic problems from occurring or escalating.
- People are offered a package of assistance specially tailored to the issues they are facing.
- People are not required to be assessed for 'housing readiness' to access accommodation.

Rapid rehousing is an approach for people whose first and most important need is to access housing; with a lack of it often the main reason why they are homeless. Rapid rehousing helps people settle quickly back with family or friends, into private rented, social housing or other affordable and safe long-term housing options.

This chapter is focussed on achieving the third element of our definition of 'homelessness ended'.

Definition 3: No one living in emergency accommodation such as shelters and hostels without a plan for rapid rehousing into affordable, secure and decent accommodation.

The definition does not mean emergency temporary accommodation is not needed. It simply states the best outcomes (for the person and the public purse) are achieved when people can access affordable, secure and decent accommodation quickly and with the right support.

Rapid rehousing can also be used to prevent people needing emergency accommodation in the first place. Prevention is fully addressed in Chapter 6. For those with high and complex needs, Housing First is the recommended approach to rapid rehousing. See Chapter 9 'The role of Housing First in ending homelessness'.

Evidence and recommendations in this chapter are informed by the national consultation and an evidence review of what works to tackle homelessness from the Social Care Institute for Excellence (SCIE). There are also several studies and evaluations of resettlement and rehousing programmes from the 1990s and 2000s that have been useful.

They capture some key aspects of effective resettlement and reintegration programmes for homeless people.[1]

7.2 Emergency accommodation

Homelessness can result in the urgent need for accommodation and shelter. This demand cannot always be met by the immediate, same-day provision of secure, long-term and stable accommodation.

During our consultation to inform this plan, people with lived experience of homelessness said safe and secure emergency accommodation was extremely important – especially for people who suddenly become homeless.[2]

Below are examples of the most prevalent forms of emergency accommodation. All provide vital assistance to thousands of people across Great Britain every night.[3] However, none are a permanent or stable solution that can end the homelessness of their individual clients or residents.

'Unsuitable' temporary accommodation

- Safe seats – this is where people 'sit up' in a safe space as an alternative to sleeping rough such as in No Second Night Out provision. It could also be mattresses or camp beds in buildings such as community centres or halls for very short periods, often during severe weather.
- Night shelters offer basic beds – often in shared rooms or dormitories with basic shared washing facilities and limited meal provision. There is often no daytime provision, although people may be directed to day centres.
- Bed and breakfast accommodation may be used – these often offer a basic room, not always with self-contained facilities, and limited access during the day.

These categories of emergency provision, with limited facilities, are not suitable or acceptable other than in an absolute emergency. A number of studies have identified the dangers and drawbacks of considering on-going emergency accommodation as an appropriate response to homelessness.[4]

'The emergency options available are pretty grim. It is only floor space when it is full, people may be sleeping on the floor. It is very chaotic and the first night is terrifying.'

Consulation participant, Cardiff

The Scottish Government has set the highest standard in limiting this use of 'unsuitable temporary accommodation' to no more than seven days, for certain homeless groups. This standard should be applied for all homeless people, including single homeless people currently excluded from time limits in Scotland[5], across Great Britain.

1 Dane, K. (1998) *Making it last: Report into tenancy outcomes for rough sleepers*. London: Housing Services Agency; Busch-Geertsema, V. (2005) 'Does Re-Housing Lead to Reintegration? Innovation' *The European Journal of Social Science Research*. 18(2), pp.205–26.; Warnes, A.M., Crane, M. and Foley, P. (2005) *London's Hostels for Homeless People in the 21st Century*. London: Pan London Providers Group.; Crane, M., Warnes, A.M. and Coward, S. (2011) *Moves to Independent Living: Single Homeless People's Experiences and Outcomes of Resettlement Sheffield*. UK: Sheffield Institute for Studies on Ageing, University of Sheffield.
2 Crisis, Groundswell and uscreates (2018) *The lived experience of homelessness*. London: Crisis
3 Homeless Link (2017) *Support for single homeless people in England 2017*. London: Homeless Link.
4 McCoy, S. (2018) *Danger zones and stepping stones: a qualitative exploration of young people's experience of temporary living*. London: Depaul UK.; Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.
5 Crisis (2018) *A life in limbo*. https://www.crisis.org.uk/get-involved/campaign/a-life-in-limbo/

Hostels

Emergency accommodation may also include hostels, which can play a vital role in providing time-limited interim accommodation for people who experience homelessness. Hostels should not be confused with the sorts of unsuitable emergency accommodation above.

In England, the hostel system is a very large part of the response to homelessness. It focuses on single homeless people. There are approximately 1,121 projects providing 34,947 bed-spaces of accommodation (a decrease of 3% since 2016).[6] Just over half the projects (580) range between one and 19 beds in size.

However, 541 accommodation services are 20 units or greater in size; and 161 projects over 50 beds in size. This level of sharing in communal spaces can be stressful and difficult to manage for people with mental health problems and other support needs.

Homeless Link's 2017 survey found that 32 per cent of hostel residents had complex needs. Fifty nine per cent of projects said they had turned people away because their needs were too high, and 42 per cent because their needs were too complex.[7]

At the other extreme, the survey found that 18 per cent of services had refused people because their support needs were too low. The Homeless Link survey for 2016 noted that 30 per cent of people in hostels and supported housing were capable of living independently, but had nowhere to go, and 40 per cent were job seekers.[8]

Many hostels in England received significant infrastructure investment under the Hostel Capital Improvement Programme and Places of Change programmes in the 2000s.[9] These programmes transformed many traditional hostels.

During this time this investment was used to ensure hostel buildings offered positive, welcoming environments. Many had en suite rooms, self-catering facilities, and on-site training and skills suites.

Hostels had previously been characterised by shared dormitories and washing facilities, screens and barriers to maintain security and restrictive regimens, including limited meal times and curfews. The Places of Change capital programme was backed up with investment in the hostel work force and training for managers and staff in providing 'psychologically-informed environments'.

In Wales, smaller hostels, typically with up to 20 bed-spaces, are the norm, alongside a small number of larger projects in Cardiff. Many local authority areas have populations that are dispersed and would not support large direct access hostels.

In Scotland, and in Glasgow and Edinburgh in particular, there were a number of large institutional hostels that closed during the 2000s. People were resettled into new or existing supported accommodation or permanent mainstream accommodation.[10] However, even the best remaining hostels still include shared spaces and environments, which compromise

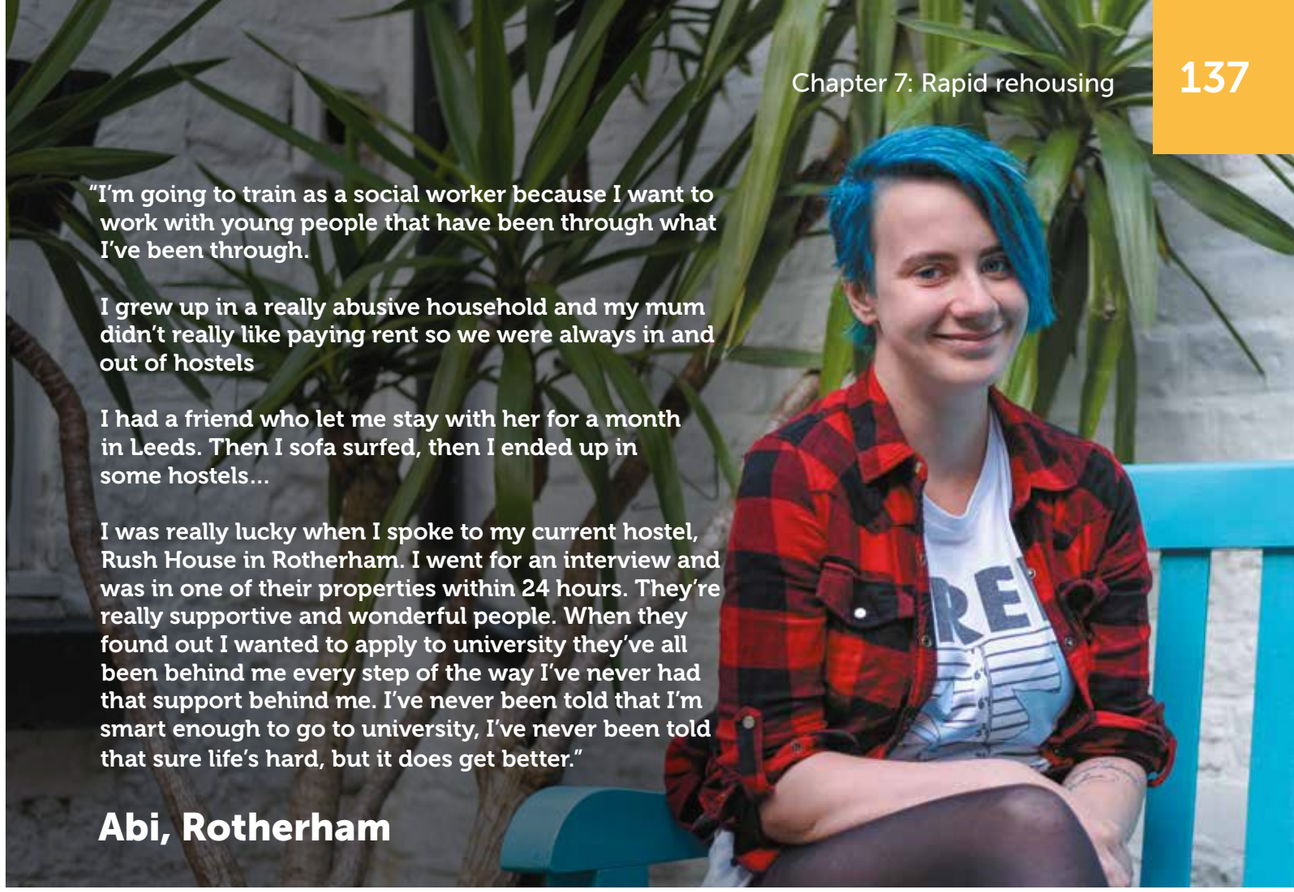
6 Homeless Link (2018) *Support for single homeless people in England: Annual review 2017.* London: Homeless Link.

7 Homeless Link (2017) *Support for single homeless people in England 2017.* London: Homeless Link.

8 Homeless Link (2017) *Support for single homeless people in England: Annual review 2016*. London: Homeless Link.

9 Office of the Deputy Prime Minister (2005) *Hostels Capital Improvement Programme: Policy Briefing 12*. London: Office of the Deputy Prime Minister.; Communities and Local Government (2007) *Creating Places of Change: Lessons from the Hostels Capital Improvement Programme 2005 – 2008*. London: Communities and Local Government

10 Fitzpatrick, S., Bretherton, J., Jones, A., Pleace, N., and Quilgars, D. (2010) *The Glasgow Hostel Closure and Re-provisioning Programme: Final Report on the findings from a Longitudinal Evaluation*. Glasgow/York: Glasgow City Council/Centre for Housing Policy, University of York.



privacy and autonomy and can prove to be difficult for some people. The Glasgow hostel closure programme evaluation found that 60 per cent of those rehoused into mainstream accommodation were coping well and finding independent living easy. A further 38 per cent were mostly okay although with some problems.

Hostels and supported housing schemes are expensive, with average weekly rates of £171, £179 and £199 in England, Wales and Scotland respectively[11]. A Great Britain average weekly rate was noted to be £173. This is considerably higher than the cost of mainstream housing.[12] These higher costs are associated with: higher maintenance; repairs and renewals; the provision of communal facilities; security and health and safety costs; higher housing management, and the nature of capital funding arrangements. The larger services require 24-hour staffing to ensure support for residents is provided; access arrangements so that residents can get in immediately; and building security and maintenance.

The evidence base for the effectiveness of hostel-based emergency accommodation in ending homelessness is limited.[13] The data collected tends to focus on experiential aspects for hostel residents. There is very little evidence relating to housing and other outcomes (see Chapter 8 'Ending rough sleeping' for more detail).

11 Ipsos Mori, Imogen Blood and Associates, Housing and Support Partnership (2016) *Supported Accommodation Review: the scale, scope and cost of the supported housing sector.* London: DWP and DCLG.

12 Homes and Communities Agency (2016) *Delivering better value for money: understanding the difference in unit costs.* London: Homes and Communities Agency.

13 Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

Host schemes

A distinct form of emergency accommodation is hosted schemes or 'Nightstops'. Host schemes aim to provide a safe, temporary, rapid rehousing option for people facing a crisis, or with no access to alternative means of support. They match accredited members of the public with a spare room to people who need a safe space to stay. Host schemes can take referrals from local authorities.

They can provide homeless people with the safety and security of accommodation and enable them to address any other support needs. Traditionally, they have been used to help young people, for whom large hostels with most people aged 25 or over and with additional needs may not be suitable.

Recent research from Depaul UK, a large provider of Nightstop services, found host schemes caused the least harm to young people.[14] The schemes, however, only offer limited support with issues such as welfare benefit claims, employment and training or finding longer-term accommodation.

Some schemes offer short-term emergency accommodation to prevent people sleeping rough or from using unsuitable temporary accommodation. They may offer a 'breathing space' from the family home. More than two thirds of young people who used the service came to Nightstop as a result of family breakdown.[15]

7.3 The scale of need

Table 7 details the core homeless population at any one point in time across Great Britain in 2011 and 2016.[16] In 2016 core homelessness in Great Britain stood at 159,900 households (142,000 in England, 11,000 in Scotland, 5,400 in Wales). These figures are fully explored in Chapter 5 'Projecting homlessness'.

The largest groups of core homeless households are those: sofa surfing (67,000); those staying in hostels, refuges and shelters (41,700), and those in 'unsuitable' temporary accommodation (19,300).

Rapid rehousing can address the homelessness of people in all of these forms of accommodation.

The numbers of people living in hostels are not predicted to increase, and future investment in hostel development is uncertain. Many providers have raised concerns about the impacts of proposed changes to the funding of short-term supported housing and hostels. These changes would remove this form of housing from the Universal Credit/ welfare system for rent payments and place all revenue funding (for both the provision of bricks and mortar, management and support) with local authorities.

Rapid rehousing from hostels will be increasingly important to ensure the best possible use is made of the stock, and as detailed below, it is also essential that the financial future of good quality short-term supported housing is secure.

14 McCoy, S. (2018) *Danger zones and stepping stones: a qualitative exploration of young people's experience of temporary living.* London: Depaul UK

15 Depaul (2017) *Nightstop Head calls for more volunteers*. 24th February: https://uk.depaulcharity.org/nightstop-head-calls-more-volunteers

16 The analysis shows the 'stock' figures of people experiencing homelessness at a given point in time, rather than the 'flow' figures, which would be the total number of people who have been homeless over a given period of time.

Table 7: Core Homelessness Projection Figures

	England		Wales		Scotland		Great Britain	
Core homelessness	**2011**	**2016**	**2011**	**2016**	**2011**	**2016**	**2011**	**2016**
Rough sleepers	5,000	8,000	200	300	900	800	6,100	9,100
Tents, cars, and public transport	5,000	8,000	200	300	700	800	5,900	9,100
Squatting and non-residential accommodation	6,800	11,500	300	300	800	400	7,900	12,200
Hostels, refuges and night/ winter shelters	44,200	38,500	900	900	2,000	2,300	47,100	41,700
Unsuitable temporary accommodation	7,000	17,000	400	200	2,700	2,100	10,100	19,300
Sofa surfers	35,000	59,000	2,900	3,400	6,000	4,600	43,900	67,000
Total	**103,000**	**142,000**	**4,900**	**5,400**	**13,100**	**11,000**	**121,000**	**158,400**

(figures are rounded to nearest thousand)

Source: Bramley 2017

7.4 Barriers to delivering a rapid rehousing approach

Housing and welfare

A pre-requisite of rapid rehousing is ensuring there is enough secure, affordable accommodation where people can be rehoused. Chapter 11 'Housing solutions' details the reasons why homeless people struggle to access affordable accommodation, and proposes solutions.

A recent Homeless Link report found that 34 per cent of accommodation projects in England cited lack of available accommodation as the main barrier to their residents moving on.[17]

Without access to appropriate accommodation, people with very few needs for support may be forced to rely upon homeless hostels. Even though these arrangements are far better than life on the streets, they may expose people to harm,[18] de-skill individuals and affect people's sense of self and confidence.[19]

They are a costly means of accommodating people whose main need is housing.[20]

Respondents to Homeless Link's annual survey also said that landlords, unwilling to accept tenants on housing benefit, formed a barrier to homeless people moving on from emergency accommodation. Similar evidence comes from Wales.[21]

It is not only private landlords who refuse tenants reliant on benefits. Social housing providers' allocations policies and financial/ affordability restrictions also limit access to social housing for homeless people. This exacerbates the underlying impact of the continued decline in the size of the social rented sector and the

17 Homeless Link (2017) *Support for single homeless people in England: Annual review 2016*. London: Homeless Link.

18 McCoy, S. (2018) *Danger zones and stepping stones: a qualitative exploration of young people's experience of temporary living.* London: Depaul UK.

19 Fitzpatrick, S., Bretherton, J., Jones, A., Pleace, N., and Quilgars, D. (2010) *The Glasgow Hostel Closure and Re-provisioning Programme: Final Report on the findings from a Longitudinal Evaluation*. Glasgow/York: Glasgow City Council/Centre for Housing Policy, University of York.

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

21 Campbell, J., Golten, A., Jackson, R., and Evans R. (2016) *Accessing and sustaining social tenancies: exploring barriers to homelessness prevention.* Swansea: Shelter Cymru.

supply of homes available at social rent levels.[22]

Our recent research has identified consistent barriers faced by hostel residents accessing permanent accommodation. These include the following:

- Restrictions within allocation policies for those with a recent history of serious and unacceptable behaviour (eg rent arrears, criminal convictions, anti-social behaviour or leaving a property in a poor condition).[23]
- Crisis services reporting the challenges of bidding for properties online.
- The high cost of deposits and rental advances required by private rented sector landlords.[24]
- Getting furniture and appliances even if able to find a property.

Shelter Cymru research also highlights the impact of local authorities and social housing providers in Wales undertaking financial assessments of prospective tenants. This can directly disadvantage people in emergency accommodation or moving through the homelessness system.[25] Social housing providers were also seen to be charging up to four weeks rent in advance to protect their income as Universal Credit was introduced. This is a major barrier to homeless people accessing settled accommodation in Wales and elsewhere.

There is less evidence of such barriers to accommodation in Scotland. However, some social housing providers operate blanket policies excluding people with rent arrears. This creates barriers to access.[26] And additional support and financial assistance is still often required to enable homeless people access to the private rented sector.[27] In Scotland, a wider issue is that the private rented sector itself is often discounted as inappropriate in terms of an option for rehousing homeless people.[28]

The challenges of financial assessments and other restrictions in allocations policy have been exacerbated by recent welfare changes. These have reduced the amount of rent in the private rented sector that can be covered by benefits.

The Local Housing Allowance was initially set at the 50th percentile of market rents, but was subsequently reduced to the 30th percentile. This means 70 per cent of private rented accommodation in an area is likely to be unaffordable to people on benefits or low incomes. In reality it is often far less. Local Housing Allowances have been frozen for several years. Meanwhile private rented sector rents are increasing at above – inflation rates in many areas of high demand, further reducing people's access. See Chapter 10 'Making welfare work' for a full exploration of these and other welfare issues affecting homelessness, plus necessary reforms.

22 Rowe, S. and Wagstaff, T. (2017) *Moving on: Improving access to housing for single homeless people in England.* London: Crisis.
23 Rowe, S. and Wagstaff, T. (2017) *Moving on: Improving access to housing for single homeless people in England.* Crisis: London
24 Gousy, H. (2016) *Home. No less will do: Improving access to private renting for single homeless people.* London: Crisis.
25 Campbell, J., Golten, A., Jackson, R., and Evans R. (2016) *Accessing and sustaining social tenancies: exploring barriers to homelessness prevention.* Swansea: Shelter Cymru.
26 Shelter Scotland (2018) *For Professionals.* https://scotland.shelter.org.uk/professional_resources
27 Dewison, N., (2016) *Improving access to the PRS: a best practice report.* London: Crisis.
28 Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Scotland 2015.* London: Crisis.

Housing supply, access and associated welfare constraints have hampered efforts to move homeless people into their own accommodation for a long time.[29] However, there have been successes despite these conditions. These include the following.

- **The Rough Sleepers Clearing House** – first established in 1991. More than 50 housing associations provided new units, or allocated existing units in exchange for central government funding to build new provision elsewhere. It is still operating today.
- **The Crisis Private Rented Sector Access Development Programme** – funded by government in England to support 153 projects in helping homeless people access private rented sector accommodation. This was both to prevent homelessness and support move-on and rapid rehousing. A total of 8,000 tenancies were created. The evidence showed 90 per cent of tenancies lasted beyond the initial six months fixed term, and could be effective long-term housing solutions.[30]
- **The Sharing Solutions programme** – designed for single people at risk of homelessness and focused on sharing arrangements between tenants, primarily in the private rented sector.[31]

Legal entitlements to rehousing

Chapter 13 'Homelessness legislation' details the differences between the three legal systems in Great Britain, and proposes the 'ideal' framework of homelessness legislation.

The Scottish statutory framework is by far the most suitable to establish rapid rehousing. However, it is not perfect as it fails to incentivise the prevention and relief of homelessness. The abolition of priority need, which came into force in December 2012, removed the arbitrary test and systematic exclusion still faced by homeless applicants in England and Wales (albeit not for prevention and some relief duties in those nations). This change effectively extended the duty upon Scottish local authorities to provide temporary and settled accommodation to non-priority need households.

Scottish local authorities are also required to conduct a housing support assessment where they believe a homeless household could benefit from such a service. The local authority is required to ensure support is provided, where needed. This could involve help with issues including: budgeting; debt management; support in getting help from other relevant services; settling into a new tenancy, or managing an on-going tenancy.

However, challenges remain in Scotland. Evidence shows that in many local authorities, the length of time people are spending in temporary accommodation is increasing.[32] Protracted periods in basic emergency temporary accommodation such as night shelters or bed and breakfast are detrimental to both the individual and the public purse.

Rapid rehousing into permanent accommodation clearly needs to be incorporated into the policy framework in Scotland to avoid increasing numbers being left in temporary accommodation for significant periods

29 Warnes, A.M., Crane, M. and Foley, P. (2005) *London's Hostels for Homeless People in the 21st Century. London: Pan-London Providers Group of Homelessness Organisations.*
30 Rugg, J. (2014) *Crisis Private Rented Sector Access Development Programme: Year Two to April 2013.* York: University of York.
31 Batty, E., Cole, I., Green, S., McCarthy, L. and Reeve, K. (2015) *Evaluation of the Sharing Solutions programme.* Sheffield: Sheffield Hallam University.
32 Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. and Watts, B. (2015) *The homelessness monitor: Scotland 2015.* London: Crisis.

"I went to the council two days ago when I realised I had nowhere to sleep that night. They gave me the address of a church... At first I thought I wouldn't go. It sounded too depressing. I thought I would just stay on the street, but it was too cold.

I only got about 20 minutes sleep. I stayed for two nights then said to the volunteers that I wouldn't be back. One of them told me that night shelter has been going for 15 years. I didn't understand that, but I didn't see many of those people at the housing office either. I think lots of folk in there have just given up on the system.

I was in the housing office at 8am this morning. I was lucky and a temporary place in a bed and breakfast came available as I was sitting there.

I don't know how long I'll be there. I'm planning to just go there to eat and sleep until I can make enough money to get my own place."

William, Edinburgh

of time. The Scottish Government's Homelessness and Rough Sleeping Action Group (HARSAG) are focusing on how to address these issues.[33]

At the time of writing HARSAG is preparing recommendations focusing on: support in temporary accommodation; quality; standards; regulation; funding, and reducing the need for temporary accommodation altogether.

The legislative frameworks in England and Wales are far from ideal when it comes to a rapid rehousing approach. Both jurisdictions have now enshrined a preventative approach. This is a big step forward and rightly lauded, yet for homeless people for whom prevention was not possible or has failed, the same cliff-edge exists for 'non-priority' groups.

The Housing (Wales) Act (2014) removed automatic priority need for prison leavers. Around the same time, the Welsh Government introduced a national pathway for homelessness services for children, young people and adults in the secure estates – intended to improve resettlement planning for those leaving institutional care.

Some interviewees in *The Homelessness Monitor Wales report (2017)* named the removal of automatic priority need for this group as one of the causes behind the increase in rough sleeping.[34] A Glyndwr University and University of Salford evaluation of the homelessness services provided to prison leavers is due in late spring 2018.

We don't yet have a 'housing-led' approach to homelessness

The importance of self-contained, 'normal' housing for the reintegration of homeless people should not be underestimated. Studies have shown homeless people, even those who have been severely marginalised and homeless for a long time, have good results keeping their tenancies in normal housing. This is provided that those people who need social support are offered it and at an adequate standard.

The evidence makes it clear that the majority of homeless people who want it should be provided with mainstream, self-contained housing as quickly as possible. This will help them avoid the destabilising and marginalising effects of prolonged homelessness.[35]

This housing-led approach is the opposite of the 'treatment first' philosophy. This approach requires people to demonstrate readiness for independent or mainstream housing. Expectations can include: abstinence; a reducing dependency on substances and alcohol; managing mental health conditions; and establishing a track record in rent payments and managing finances.[36] There is little evidence available on the extent to which this model is currently applied within Great Britain.

33 Scottish Government (2017) *Homelessness and rough sleeping action group.* https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group

34 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2017) *The Homelessness Monitor: Wales* 2017. London: Crisis

35 Busch-Geertsema, V. (2005) *Does Re-Housing Lead to Reintegration?* Innovation: The European Journal of Social Science Research. 18(2), pp.205–26.

36 Johnsen, S., and Teixeira, L. (2010) *Staircases, elevators and cycles of change: 'Housing First' and other housing models for homeless people with complex support needs.* London: Crisis.

The treatment first, or 'staircase' model has been the dominant approach in North America and many European contexts for decades. The Housing First movement is now challenging this, and providing evidence of comparative outcomes for homeless people in trials comparing the two.[37]

In Great Britain, the 61,000 households living in hostels and other emergency accommodation show we are a long way from a truly housing-led system. However, we cannot characterise our whole homelessness system as treatment first. There are plenty of examples of schemes providing rapid access to accommodation for homeless people. This includes the London Clearing House scheme for rough sleepers; where people receive support to maintain tenancies, rather than to qualify for them.

However, housing-led approaches are the exception for most homeless people particularly in England and Wales where the legal framework continues to discriminate against 'non-priority' homelessness.

As the 2017 Homeless Link survey of hostel and supported accommodation providers showed, too many people remain in emergency temporary accommodation when they do not need to.

There will always be a key role for emergency temporary accommodation. But a housing-led system providing rapid rehousing for people with low or no support needs and Housing First for people with complex needs is urgently needed. Combined, they represent an evidence-based shift in provision and philosophy.[38]

7.5 The evidence for rapid rehousing

The provision of rapid rehousing typically involves the following.

- **Housing identification.** Housing identification services help find the most appropriate housing for the person/household and address any potential barriers to securing this accommodation. For example, the person concerned may need help filling in housing applications.

- **Financial assistance with rent or move-in costs.** Rapid rehousing programmes should offer financial assistance to cover move-in costs, deposits, and rental or utility assistance for an agreed period of time. This is similar to private rented sector access programmes in the UK, where rent guarantees or rent in advance are provided. Financial assistance through housing benefit is provided in the UK, albeit with significant difficulties for many people.

- **Tailored package of assistance.** Any assistance provided should be tailored to the person or family's need so they receive appropriate assistance and for the correct length of time.

- **Case management and services.** Case management should be provided to help households overcome barriers to securing and maintaining housing. Case managers can also help put households in contact with local services if necessary, including getting support with training and work.

37 Padgett, D.K., Henwood, B.F. and Tsemberis, S.J. (2016) *Housing First. Ending Homelessness, Transforming Systems, and Changing Lives*. Oxford: Oxford University Press.
38 Cunningham, M. K., Gillespie, S. and Anderson, J. (2015) *Rapid re-housing: What the research says*. Washington, DC: Urban Institute.

The evidence of success through this approach, gathered by Social Care Institute for Excellence (SCIE) for this report, is presented in the following pages.

Homeless families

In the US, rapid rehousing is increasingly used for families. It provides them with short-term help with housing expenses such as rent arrears, on-going rent assistance and moving costs. It also provides case management support to help them maintain their housing stability.[39]

Many transitional rapid rehousing housing programmes in the US use a Housing First approach. This is to get families into permanent housing and keep them stable once they are there instead of providing services beforehand to get them ready for a permanent placement.

Unlike most Housing First supportive housing programmes, however, rapid rehousing is time limited. It creates a bridge allowing households to move quickly out of homelessness and back into the community, where broader mainstream resources are available. Connecting participants to mainstream services to address ongoing needs is critical to the long-term success of formerly homeless families.

Evidence shows this approach is successful. There is a low rate of people returning to homeless shelters, although families may still require interventions and support in the future.[40] The SCIE report notes that redesigning the homelessness assistance system will not solve the housing affordability crisis. However, it may use resources more efficiently and help families leave the homeless system more quickly.

Homeless people with low support needs

Analysis from SCIE identified strong evidence of the effectiveness of rapid rehousing for people identified as having lower support needs. Keys to success included: quick and appropriate referrals; guidance about and availability of other services and benefits people might need; financial assistance, and assistance specially tailored to the client's needs.

A 2011 study of the outcomes of resettlement of 400 single homeless people in London, Nottinghamshire and Yorkshire identified successes in a range of tenures.[41] Up to 18 months after resettlement, 81 per cent of those in social housing were still housed, alongside 69 per cent of those rehoused in the private rented sector.

The study revealed some consistent elements of success, including the following.

- Active and practical tenancy support. This included: help with benefit claims; rent payments and arrears repayment schedules; setting up utility payments, and support with repairs; decorating properties, and fitting them out with basic furniture.

- Properties offered furnished (with starter packs) or with immediate access to furniture schemes.

- Repairs and maintenance completed before people move in.

- Transport provided to assist people to move in and avoid the need for multiple trips by public transport.

39 Cunningham, M. K., Gillespie, S. and Anderson, J. (2015) *Rapid re-housing: What the research says*. Washington, DC: Urban Institute.
40 SCIE (2018) *A rapid evidence assessment of what works in homelessness services*. Social Care Institute for Excellence.
41 Crane, M., Warnes, A.M. and Coward, S. (2011) *Moves to Independent Living: Single Homeless People's Experiences and Outcomes of Resettlement Sheffield*. Sheffield: Sheffield Institute for Studies on Ageing, University of Sheffield.

Support with employment, training and education, peer mentors and volunteers to help people with moving and accessing community resources were also identified as important. They improved morale and motivation, both factors essential to a tenant's resilience and their ability to keep their housing.[42]

These findings reflected those of an earlier study into the tenancy outcomes for around 4,865 people housed through the Rough Sleepers Clearing House.[43] Both studies highlight the need for housing units to be in places where tenants had support, with access to community resources, and where they felt safe. These factors give people a better chance of feeling at home and having the resilience to cope with other issues in life and the day-to-day relations with landlords and neighbours.

There are no comparative studies in the UK showing how people cope without support to quickly resettle into mainstream accommodation. However, the evidence repeatedly shows that when rapid rehousing is planned and carefully delivered for those with low support needs, it ends the homelessness of most people.

Critical Time Intervention

Rapid rehousing is often linked to the concept of Critical Time Intervention (CTI).

CTI is an evidence-based programme, with prevention at its core. Internationally, it has ended the homelessness of up to 95 per cent of people involved.[44] CTI ensures that people leaving prison and other state institutions and those going through transitions with a homelessness risk are rapidly rehoused. It also involves giving them appropriate support before and after their new home is found.

For a more detailed explanation of CTI, see Chapter 6 'Preventing homelessness'.

42 Crane, M., Warnes, A.M. and Coward, S. (2011) *Moves to Independent Living: Single Homeless People's Experiences and Outcomes of Resettlement Sheffield.* Sheffield: Sheffield Institute for Studies on Ageing, University of Sheffield.

43 Dane, K. (1998) *Making it Last: A Report on Research into Tenancy Outcomes for Rough Sleepers.* London: Housing Corporation.

44 Benjaminsen, L. (2013) *Sustainable ways of preventing homelessness: Results from the Housing First based Danish Homelessness Strategy and the challenges of youth homelessness* (Prepared for Peer Review in Social Protection and Social Inclusion programme) http://ec.europa.eu/social/main.jsp?langId=enandcatId=89andnewsId=1884andfurtherNews=yes

7.6 Recommendations

Ensuring people are not stuck in unsuitable temporary accommodation

Problem

There are thousands of people living in unsuitable temporary accommodation such as bed and breakfasts and nightly paid accommodation.[45] This is detrimental to them and expensive for local authorities.[46]

Solution

A rapid rehousing approach should be adopted. Strict time limits should be placed on the use of unsuitable temporary accommodation of no more than seven days. This should apply to all homeless households, not just families or 'priority' groups.

Impact

This approach is needed immediately. However, the change will not be possible across all three countries at the same time. In Scotland, this change to ensure the seven-day limit applies to all households can be made immediately. In England and Wales, the change depends on both an improved entitlement to rehousing for current 'non-priority' groups. It also depends on wider reforms to increase the housing provision for homeless people.

Responsibility for change

The Westminster, Welsh and Scottish Governments, alongside oversight from a new or improved regulatory body in each nation, as set out in Chapter 13 'Homlessness legislation'.

Local authority strategies to provide rapid rehousing

Problem

In addition to people living in unsuitable temporary accommodation, there are more than 40,000 households living in hostels, and others forms of emergency accommodation.[47] These people should be offered mainstream housing and then relevant support once their homelessness is ended. However, rapid rehousing is not the strategic response from central or local governments.

Solution

National governments should introduce a new duty for local authorities to conduct an annual review of their homelessness strategy. The strategy must contain key performance targets for delivering new affordable permanent housing linked to the numbers of people experiencing homelessness, as well as the support required to help people maintain their home. Annual reports on progress against key performance targets should be submitted by local authorities to national governments and these reports should be made publically available.

National governments, working with local authorities, should set targets or quotas ensuring a supply of homes for homeless people. This should include the numbers of people in all forms of emergency accommodation, in every locality.

This would require a new approach to local homelessness strategies. It requires each area to set real targets of housing and support based on data, and a housing-led approach to ending homelessness.

45 Bramley, G. (2017) Homelessness projections: Core homelessness in Great Britain, London: Crisis.

46 Crisis (2017) *A Life in Limbo – the use of prolonged unsuitable accommodation for homeless people in Scotland*. London: Crisis.

47 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.

Local authorities should develop targets and strategies around the numbers of people in temporary and emergency accommodation and those sleeping rough. Assessments should be undertaken. They should determine which people need a Housing First approach and those who need a CTI rapid rehousing approach, to leave homelessness for good. These assessments should inform commissioning and provide the evidence base for the systems change required. See the box below for an exploration of the implications for local authority commissioned services.

In Scotland, the Homelessness Rough Sleeping Action Group (HRSAG) recently commissioned local authority guidance on how to transfer to a rapid rehousing approach. The guidance will be used to help a five year transition across the country.[48]

Impact
This improved housing-led approach to actual homeless populations with housing and support targets will have a marked impact. Local authorities will need funds to deliver rapid rehousing, and also the wider set of reforms regarding housing access, supply and the private rented sector.

Responsibility for change
The Westminster, Welsh and Scottish Governments.

Perth and Kinross Council
Over the past ten years Perth and Kinross Council have been transforming their homeless services and improving outcomes for homeless households through service redesign and a range of new approaches.

More recently they have introduced Home First, which supports homeless people to move directly to settled accommodation, where possible, and has built-in flexibility to respond to the multiple and complex needs of vulnerable customers. This new approach has significantly reduced the time homeless people wait for permanent housing and reduced reliance on the use of temporary accommodation.

One of the many steps they took to achieve this was to carry out a full review of how they provide their homeless service and how they allocate housing. The Council is part of a common housing register with the two largest housing associations in the area, Caledonia and Hillcrest. These three landlords have had a common allocations policy since 2010.

In 2016 the landlords reviewed their allocation policy, which placed a greater emphasis on Housing Options exploring all viable options to those in housing need. One change within the policy was to allow single people, from whom there was the highest demand in the homeless system, to opt for two bedroom properties as well as one, given insufficient supply of the latter. They also agreed a quota of lets to homeless households and to ensure best use of stock, the team adopted various approaches including the use of 'vacancy chains'.

Through a combination of measures including enhanced access to the private rented sector, new build and 'buy-back' initiatives the Council were able to increase allocations to homeless households to 60 per cent which helped reduce the backlog of 'live' homeless cases. The impact on single people has been especially beneficial, allowing the Council to give more personalised and targeted focus to those with very specific housing needs, such as large families or people with medical requirements. It has drastically reduced stays in temporary accommodation and tenancy sustainment rates have remained high (over 90%) for previously homeless households. Perth and Kinross is now in a position where total allocations to homeless households are reducing, due to fewer homeless people waiting on every property shortlist.

These positive outcomes have been achieved through many years of joint working between landlords, stakeholders, and a housing service wide approach to redesign. But it shows what can be done when all partners work together and the service has the confidence to make radical changes to how homeless services are delivered.

Rapid rehousing and local authority services – a recommended approach
A rehousing strategy should be developed to identify activities and interventions required to secure adequate accommodation for homeless people. This should include the following options developed with accommodation providers, those providing emergency accommodation, support services and, most importantly, those living in emergency accommodation. Each local authority area's plan should reflect its local housing conditions and markets, but is likely to include one or more of the following.

- **Accessing accommodation**
  Quotas for accommodation units, for people in emergency accommodation, and those needing to avoid it, should be negotiated with social housing providers. In England and Wales, local authorities should make greater use of their powers to provide accommodation for homeless people who are eligible and without a priority need for housing. In Scotland there is already a duty to provide housing for people who are homeless regardless of priority need. This is important to enable rapid rehousing solutions to be effective.

  Depending upon the scale of need, consideration should be given to establish 'clearing house' arrangements. These can ensure housing is made available to those needing to move from emergency temporary accommodation. Outside Scotland, where local authorities have stronger referral duties, a clearing house can also act as a broker between hostels/emergency accommodation providers and providers of permanent or stable housing.

- **Regional protocols**
  Arrangements for rapid rehousing should reflect that homeless people may have had to move areas to get emergency housing, and have built new links within these communities. Until local connection rules are scrapped by national governments, they should be suspended between local authorities in different regions. This will ensure they do not unnecessarily block rapid rehousing.

- **Social lettings agencies**
  Depending on the scale of need, and the condition of the private rented sector, the establishment of social lettings agencies should be considered. Their remit could also include lettings to social housing and a 'clearing house' approach to ensuring the most appropriate match between people and properties.

- **Private rented sector access schemes or help to rent schemes**
  Private rented sector access schemes have a track record of enabling people to leave homelessness and reintegrate in their communities.[49] Every area with significant private rented accommodation will benefit from this approach. Participants in the national consultation informing this plan identified this as key in providing a quick and effective response to help people out of homelessness.[50]

48 Indigo House (forthcoming 2018) *Scotland's transition to rapid rehousing*

49 Rugg, J. (2014) *Crisis' Private Rented Sector Access Development Programme Final Evaluation Report.* London: Centre for Housing Policy, University of York and Crisis.

50 Hughes, N. (2018) *Have your say policy consultation: summary report*. London: Crisis.

- **Allocations policies**
  For full details of reforms needed to allocations policy, see Chapter 11 'Housing solutions'. However, people are currently subjected to arbitrary barriers regarding the way housing is allocated. Historic rent arrears and offending behaviours are just some of the barriers that may stop them getting the housing they need. For rapid rehousing to be effective, arbitrary barriers to individuals and groups should be removed, alongside any blanket banning of people accessing social housing in the future.

- **Lettings practices**
  Landlords should offer furnished tenancies and starter packs so people have the basics they need to feel safe and comfortable. Wherever possible, choice and control should be built in so people can choose colour schemes and designs. Having input into their new home is important to people's morale and motivation.

  Landlords should review their practices of pre-allocations. People should not have to move into accommodation where repairs and redecorations are outstanding. If this is unavoidable, clear timescales and budgets for redecorations should be made explicit. Repairs should be prioritised so people gain trust and feel their landlord is committed to their tenancy.

Every local authority should also develop a comprehensive service plan to support rapid rehousing from emergency accommodation into stable accommodation. These support services should be designed with the following elements.

1. Support with practical issues and capabilities

Staff should be flexible and willing to focus on a person's specific needs. The way in which they work should reflect the strengths and capabilities of each person.

Some people can be coached or given basic advice to assist them in completing many of the tasks associated with setting up a tenancy. These tasks can include sourcing furniture, connecting utilities and setting up rent payments. Others will need more direction.

Training in the responsibilities of being a tenant will be useful for many and will be positively perceived by many landlords. However, it should never be applied as a pre-condition to housing.

2. Support to build emotional and social capital and resilience

Homelessness is a traumatic experience and moving house will be stressful and overwhelming for some people. So, motivational support and encouragement from well-trained staff is essential in helping a homeless tenant settle in and maintain their tenancy. Staff will need to be able to visit people in their own homes and be trained in using a variety of approaches as required. These might include coaching, Information Advice and Guidance (IAG) approaches, motivational interviewing, cognitive behavioural therapy approaches, mediation, active listening and counselling techniques. They will need to be resilient and tenacious in offering their support even when people may turn it down, seem disinterested or negative.

Trauma-informed practice and access to reflective practice supervision are important core principles. These are recognised as vital when delivering Housing First, but can be drawn upon when engaging with individuals with lower needs.

3. Critical Time Interventions

There is strong evidence of CTI success. Commissioners should ensure CTI is available to those at risk of homelessness leaving emergency accommodation and people leaving custody and other state institutions.

4. Housing First

Housing First is the preferred option for all homeless people with complex needs. Rapid rehousing to Housing First services should be part of every local authority strategy. For more information on how to scale up this approach, see Chapter 9.

Improved entitlements for homeless people

Problem
As detailed above, in England and Wales, homeless people considered a non-priority case can be denied rehousing. All eligible homeless people are owed a duty by their local authorities to take all reasonable steps to prevent them becoming homeless, or relieve homelessness where prevention is not possible. However, there is no guarantee of accommodation in the short or the long term.

The Scottish system entitles all eligible homeless households to settled accommodation. Local authorities also have a duty to assess whether support is needed once people are rehoused, and to ensure that it is provided.

These entitlements are not the perfect answer, as demonstrated by the persistence of rough sleeping in Scotland[51], and of homeless people spending long periods in temporary accommodation.[52] However, the Scottish approach is the most generous.[53]

Solution
The introduction of two duties would make a significant difference in ensuring that homelessness is rare, brief and non-recurring. These are:

1 **A duty to provide temporary and settled accommodation** (regardless of priority need). Until priority need is abolished, there is an urgent need to protect people from sleeping rough. This should be done via a local authority duty to provide interim accommodation for anyone who is homeless and would otherwise have nowhere safe to stay.

2 **A duty to undertake a person-centred assessment and provide the support needed, within a housing-led system.**

For more information on the ideal legal framework to end homelessness see Chapter 13.

Impact
These measures would dramatically improve entitlements for homeless people in England and Wales. They would open up the full range of local authority statutory provision and also complete the reforms begun by the introduction of the prevention and relief duties in 2018 and 2015 respectively. These legal changes would have greatest impact coupled with sufficient local authority funding and wider housing supply reforms to increase the number of homes available to homeless people.

Responsibility for change
The Welsh and Westminster Governments.

51 ScotPHO (2017) *Homelessness: demographics. The Scottish Public Heath Observatory* http://www.scotpho.org.uk/life-circumstances/homelessness/data/demographics/
52 Shelter Scotland (2017) *The use of temporary accommodation in Scotland.* Edinburgh: Shelter Scotland. https://scotland.shelter.org.uk/__data/assets/pdf_file/0020/1325711/The_use_of_temporary_accommodation_in_Scotland.pdf/_nocache
53 Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. and Watts, B. (2015) *The homelessness monitor: Scotland* 2015. London: Crisis.

Protected funding for the provision of emergency accommodation

Problem
While the shift to housing-led, rapid rehousing is central to this plan, we should never allow the provision of good quality emergency accommodation to be withdrawn. Over time, it is reasonable that hostels and other emergency accommodation will be scaled back, but there will always be a need for short-term, high-quality emergency provision.

Some supported housing schemes, especially those with high levels of wear and tear such as hostels, have considerably higher costs than mainstream social or private rented sector accommodation. The introduction of Universal Credit means that these higher costs would need to be managed within a centralised system. The design of Universal Credit also makes it too inflexible to respond to short stays in supported accommodation. As a result, the Government has undertaken a Great Britain-wide consultation about the future funding of supported housing during 2017 and 2018.

At the time of writing, proposed changes to funding for short-term supported housing will transfer the rents and eligible service charges into a ring-fenced pot. Local authorities will administer this. It will include very short-term emergency accommodation, and all supported housing with an intended stay of less than two years' duration.

We are concerned this will reduce funding available over the long term, if the ring fence is lost. It will also reduce the ability of providers to raise finance to invest in improving or maintaining the quality of existing services, or to build new supply. There are concerns that good quality short-term accommodation for homeless people could be lost, resulting in more people sleeping rough.

Solution
Rather than introduce major changes to the funding of short-term supported housing, the government should ensure the design of the Universal Credit system is flexible and responsive. It should be able to meet the needs of people in supported housing and fully take account of supported housing costs.

Any future consideration of funding for supported housing should be undertaken as part of a housing and homelessness-focused strategic review. Once governments have consulted upon and agreed future plans for tackling homelessness, their funding strategies should reflect these. This should see less demand and need for short-term supported housing. Better prevention services and housing-led approaches should result in people receiving the support they need in mainstream accommodation.

Impact
Homelessness and housing policy are devolved matters, but welfare is not. The Westminster Government should take responsibility for ensuring Universal Credit is compatible with the short-term supported housing sector and fully meets the associated housing costs. This will ensure people in need of short-term supported housing are not discriminated against by being reliant on local councils for covering their housing costs. They should have their rents paid in the same way as other citizens. This should be undertaken immediately.

The Westminster Government should take responsibility for ensuring the Universal Credit system can respond reliably and efficiently to the higher rents that exist in the short-term supported housing sector. Each government should adopt a plan to move towards a housing-led approach to preventing and tackling homelessness. The Scottish, Welsh and Westminster Governments should work together to develop funding systems supporting strategic, integrated and holistic housing-led services that ensure homelessness is rare, brief and non-recurrent.

Better evidence of what works in rapid rehousing

Problem
Despite the compelling evidence that rapid rehousing successfully ends homelessness for people with low support needs, there are some key gaps in evidence. These include a lack of UK-based evidence that meets the highest comparative standards (Random Controlled Trials; Systemic Reviews). There is also a lack of data relating to groups of homeless people including young people, LGBT groups, and survivors of domestic abuse.[54]

Solution
The Centre for Homelessness Impact has recently been established specifically with the remit of completing assessments of the evidence of solutions to homelessness, and to fill any gaps. The Centre should be commissioned to improve the evidence-base for rapid rehousing approaches, especially in comparing to treatment as usual in Great Britain, and for specific groups of homeless people.

Impact
While any studies will take a number of months to complete, the Centre for Homelessness Impact can be commissioned immediately.

Responsibility for change
The Westminster, Scottish and Welsh Governments will need to commission this work, ideally together.

54 SCIE (2018) *A rapid evidence assessment of what works in homelessness services*. London: SCIE.

7.7 Wider reforms

In addition to the measures included in this chapter, the reforms recommended in other parts of the plan are also necessary in shifting to a rapid rehousing approach. The most important among them follow below.

- Boosting the supply and accessibility of affordable housing. See Chapter 11.
- Removing allocation restrictions that prevent homeless people accessing social housing. See Chapter 11.
- Ensuring the welfare system acts as an effective safety net for people at risk of homelessness, and does not increase the chances of people becoming homeless. See Chapter 10.
- Ensuring the private rented sector is a more suitable tenure for people at risk of homelessness and those that have already experienced it. This includes improvements in affordability, conditions and security. See Chapter 11.
- Establishing a robust and effective regulator of statutory homelessness services in each nation. See Chapter 13.
- Establishing Housing First within each nation, with national leadership, housing and support targets, and sufficient funding. See Chapter 9.

7.8 Conclusion

The inter-related elements to achieving successful rapid rehousing[55] and ensuring no one is left living in emergency accommodation without a plan for moving on are:

- measures that increase the supply and access to accommodation
- interventions and services that support people through the process of rapid rehousing, and ensure they are able to maintain the accommodation.

Both elements need to be in place for this definition of core homelessness to be ended.

There are challenges to be overcome, particularly accessing suitable accommodation which remains very difficult in certain rental markets. However, the personal costs of not doing so are high. They involve people with their lives on hold in emergency accommodation, feeling unable to afford to work and contribute, struggling to maintain positive support networks, and feeling deskilled, demotivated and depressed.

Rapid rehousing makes sense for society and individuals. As evidence from the US, Europe and increasingly the Great Britain shows, re-engineering a homelessness system may take time but will make a crucial difference in ending homelessness.[56]

55 Cunningham, M,. Gillespie, S. and Anderson, J. (2015) *Rapid Re-Housing What the Research Says.* Washington: Urban Institute https://www.urban.org/sites/default/files/publication/54201/2000265-Rapid-Re-housing-What-the-Research-Says.pdf

56 Pleace, N. (2018) *Using Housing First in Integrated Homelessness Strategies A Review of Evidence.* York: Centre for Housing Policy: University of York https://www.mungos.org/wp-content/uploads/2018/02/ST_Mungos_HousingFirst_Report_2018.pdf

7.9 Summary of recommendations

England/Westminster

- Establish a strict time limit of seven days for people staying in unsuitable temporary accommodation.
- Introduce a new duty for local authorities to conduct an annual review of their homelessness strategy. Each strategy must contain key performance targets for delivering affordable permanent housing linked to the numbers of people experiencing homelessness, as well as the support required to help people maintain their tenancy and address support needs. Annual reports on progress against key performance targets should be submitted by local authorities to national governments and these reports should be made publicly available.
- Abolish priority need.
- Introduce a duty to provide immediate emergency accommodation to all those with nowhere safe to stay, until priority need is abolished.
- Place a duty on local authorities to provide the housing support that has been identified via a personalised housing plan.
- Protect the long-term funding mechanism for emergency accommodation and ensure that the Universal Credit system is flexible and responsive enough to meet the needs of people living in supported housing.
- Work with the Scottish and Welsh Governments to develop funding systems that support the delivery of rapid rehousing models, tailored to each devolved nation, of housing-led services.
- Commission the Centre for Homelessness Impact to improve the evidence base relating to rapid rehousing approaches.

Scotland

- Establish a statutory time limit of seven days for people staying in unsuitable temporary accommodation.
- Introduce a new duty for local authorities to conduct an annual review of their homelessness strategy. Each strategy must contain key performance targets for delivering affordable permanent housing linked to the numbers of people experiencing homelessness, as well as the support required to help people maintain their tenancy and address support needs. Annual reports on progress against key performance targets should be submitted by local authorities to national governments and these reports should be made publicly available.
- Commission the Centre for Homelessness Impact to improve the evidence base relating to rapid rehousing approaches.

Wales

- Establish a strict time limit of seven days for people staying in unsuitable temporary accommodation
- Introduce a new duty for local authorities to conduct an annual review of their homelessness strategy. Each strategy must contain key performance targets for delivering affordable permanent housing linked to the numbers of people experiencing homelessness, as well as the support required to help people maintain their tenancy and address support needs. Annual reports on progress against key performance targets should be submitted by local authorities to national governments and these reports should be made publicly available.
- Abolish priority need
- Introduce a duty to provide immediate emergency accommodation to all those with nowhere safe to stay, until priority need is abolished.
- Place a duty on local authorities to provide the housing support that has been identified via a personalised housing plan.
- Commission the Centre for Homelessness Impact to improve the evidence base relating to rapid rehousing approaches.

"If someone had told me that later on in life I would be homeless I would have sworn blind – never. You can never expect it. It just happens.

I came home to London from my mother's funeral in Barbados in 2000. It took me about six months to get back into work, but within nine months of working I couldn't afford to live on my salary. It felt like everything had skyrocketed overnight. The house prices and renting had gone up so much that I couldn't afford to pay rent and keep myself clothed and fed at the same time.

I started staying at my sister's house, but that wasn't convenient at all because they shared together already. I wanted my own place, but I found it really hard to raise my deposit and I was in a real rut.

There was no way out. People can only help you for so long... I was young, my life was flourishing, and out of the blue, I'm homeless.

Homelessness is a dog's life. People scorn you. I wouldn't wish it on my worst enemy. People try to adapt to it but I found it hard. I never realised how important a bed was, and sleeping was. Being able to stretch out. You just survive, by any means necessary."

Saville, Croydon

Chapter 8:

Ending rough sleeping

Rough sleeping is the most dangerous form of homelessness. It can and must be resolved, for each person experiencing it, and collectively for society.

This chapter details how rough sleeping can be ended. We use evidence of what works from both at home and abroad to tackle it.

8.1 Introduction

Rough sleeping is the most visible and damaging form of homelessness. It rightly causes the most concern among the public, decision makers, and advocates for homeless people in the charity sector. Rough sleeping is not usually the first form of homelessness people experience. However, tackling it must be central to any plan to end homelessness, given the extreme dangers posed to people living on our streets.

This chapter sets out how to achieve the first and second definitions of 'homelessness ended' as described in Chapter 3 'Defining homelessness ended'.

Definition 1 – No one sleeping rough.

Definition 2 – No one forced to live in transient or dangerous accommodation such as tents, squats and non-residential buildings.

As explained in Chapter 2, 'Public policy and homelessness', there have been successful attempts to reduce rough sleeping by the Westminster and Scottish Governments. There is also increasing international evidence to supplement the lessons of these recent successes.

This chapter has been informed by a specially commissioned review of the evidence at home and abroad about proven successful attempts to tackle the problem.[1]

Although rough sleeping is the most damaging form of homelessness, it is also the least prevalent and so it is entirely within the power of policy makers and service providers to end it. There has never been more evidence about how to do so.

On any given night, there are an estimated 9,100 people sleeping rough in Great Britain. This figure can be reduced to zero within ten years. But only with the necessary policy changes to prevent further rough sleeping, and evidence-based interventions to rehouse people.

This chapter details the solutions to rough sleeping. It necessarily and intentionally repeats some solutions and recommendations from other chapters. We focus on rough sleeping as an urgent priority and look at it within a wider strategy in each nation. It also details what investment is needed for those solutions to be implemented.

Our approach to developing rough sleeping solutions is summarised in the diagram on page 160.

A summary of the actions required by each national government is given at the end of the chapter.

Ensuring rough sleeping is rare

Successful prevention is based on a principle of universal access to emergency and permanent accommodation

Effective prevention services are required when people leave state institutions

Resolving rough sleeping quickly when it happens

Outreach is effective when matched with available accommodation, personal budgets and guaranteed support

All barriers to support must be removed

Making sure no-one returns to the street

Housing First and other housing-led approaches are the proven answer to resolving long-term homelessness and rough sleeping

These must be delivered at scale

1 Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

The impact of rough sleeping

The suffering of people who experience rough sleeping is overwhelming. It severely affects their physical and mental health and personal safety.

Mortality rates among homeless people are higher than the general population. Those affected by homelessness are ten times more likely to die than those of a similar age in the general population.[2] The average age of death for homeless people is just 47.[3] Rough sleepers are likely to have an even higher risk of dying. Recent data from people living on London's streets reveals their average age of death as 44.[4]

The Homeless Link Health Needs Audit in England shows that 88 per cent of rough sleepers report physical health problems. This includes 49 per cent who report a long-term health condition.[5] The physical health problems associated with rough sleeping include higher rates of tuberculosis and hepatitis compared to the general population. Health problems also include skin diseases and injuries following assault on the streets.[6] Very high rates of respiratory conditions among people sleeping rough are common too.[7]

Mental health problems among rough sleepers are very common and often acute. Research from the homelessness charity St Mungo's shows that more than 40 per cent of people sleeping rough have a mental health problem. It also highlights that those with mental health problems are 50 per cent more likely to spend a year or more on the streets.[8] Rough sleepers report that the experience itself leads to isolation, to stigma and can take a serious toll on their mental wellbeing.[9]

Living on the streets also involves personal danger. Our 2016 study showed that 77 per cent of rough sleepers had been a victim of crime or anti-social behaviour in the previous 12 months.[10] This included 30 per cent who experienced violent attacks, six per cent who had been the victim of sexual assault, and 51 per cent who had their possessions stolen.

2 Aldridge, R., Story, A., Hwang, S.W., Nordentoft, M., Luchenski, S.A., Hartwell, G., Tweed, E.J., Lewer, D., Katikireddi, S. V. and Hayward, A. C (2017) 'Morbidity and mortality in homeless individuals, prisoners, sex workers, and individuals with substance use disorders in high-income countries: a systematic review and metaanalysis' in *The Lancet*. 391 (10117)

3 Thomas, B. (2012) *Homelessness kills: An analysis of the mortality of homeless people in early twenty-first century England.* London: Crisis.

4 St Mungo's (2016) *Nowhere Safe to Stay: the dangers of sleeping rough.* London: St Mungo's.

5 Homeless Link (2014) *The Unhealthy State of Homelessness – Health Audit Results 2014.* London: Homeless Link.

6 Office of the Deputy Prime Minister (2002) *Addressing the Health Needs of Rough Sleepers. December 2002.* http://www.fph.org.uk/uploads/r_rough_sleepers_2002.pdf

7 Groundswell (2016) *Room to Breathe.* http://groundswell.org.uk/wp-content/uploads/2017/10/Groundswell-Room-to-Breathe-Leflet-Poster-for-Web.pdf

8 St Mungo's (2016) *Stop the scandal: an investigation into mental health and rough sleeping (summary – February).* London: St Mungo's.

9 Sanders, B. and Albanese, F. (2016) *"It's no life at all": Rough sleepers' experiences of violence and abuse on the streets of England and Wales*. London: Crisis.

10 Sanders, B. and Albanese, F. (2016) *"It's no life at all": Rough sleepers' experiences of violence and abuse on the streets of England and Wales*. London: Crisis.

Figure 8.1: Rough sleeping count England

Source: MHCLG and RSU

Estimating the scale of Great Britain's problem

The experience of rough sleeping for any one person is frightening and devastating; more than 9,000 bedding down every night on our streets is a damning indictment of our society. We are one of the richest nations in the world and we are ignoring the strong evidence and experience of how to solve the problem.

The numbers of people sleeping rough in England, Scotland and Wales are recorded and presented in different ways by governments in the three countries. These official statistics each have flaws in terms of data integrity. The official statistics are detailed in this chapter, alongside an assessment of the methods used to collect the data.

The rough sleeping estimates from the Heriot-Watt homelessness projections research are also presented.[11] They show an estimated 9,100 people sleeping rough in Great Britain on any one night.

As detailed in Chapter 5 'Projecting Homelessness', these figures represent a more comprehensive estimate of the problem and use a range of informed sources. These data sources are used later in the chapter to show the demand for rough sleeping interventions and solutions.

England

The rough sleeping count for autumn 2017 reported that 4,751 people had been counted or estimated.[12] This represented a 15 per cent rise on the previous year, and a rise of 169 per cent since 2010 when the current methodology was adopted, see figure 8.1.[13]

These figures are a combination of numbers of people who have been seen while sleeping, bedded down, or about to do so. They also include people who have been seen living in places not fit for human habitation, such as stairwells or car parks.[14]

These figures are made up of both counts and estimates from local authorities of the number of people thought to be sleeping rough in a local authority area on a 'typical night'. This night is a single date chosen by the local authority between 1 October and 30 November.[15] It is a snapshot and will not include everyone in the area with a history of rough sleeping. In 2017, 87 per cent of councils estimated and 13 per cent counted.

In 2015, the UK Statistics Authority (UKSA), which oversees the validity of official government data, conducted an investigation into the homelessness statistics.[16] UKSA concluded that government data on rough sleeping does not meet standards required to be considered 'national statistics', and that the data falls short in 'trustworthiness, quality, and value'.[17]

Despite the problems with England's official figures, there are useful indications within the data of where rough sleeping is most common and of different characteristics of homeless people. For example, we know that rough sleeping in London has consistently accounted for approximately a quarter of the national problem over the previous seven years. We also know that approximately 14 per cent of rough sleepers are women; and that very few people sleeping rough (an estimated 0.1 per cent) are under the age of 18.[18]

While the scale of rough sleeping is unlikely to be accurately reported within official data, the statistics provide an insight into which interventions could tackle the problem.

The CHAIN (Combined Homelessness and Information Network) database in London is also useful. It records multi-agency information, including outcomes for individual rough sleepers. It is through this data that we can track the success of interventions like No Second Night Out (NSNO). This has achieved marked success in reducing the numbers of people who experience a second or ongoing experience of rough sleeping in the capital.[19]

11 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.

12 The Ministry of Housing, Communities and Local Government (2018) *Rough sleeping in England: autumn 2017*. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017

13 The pre-2010 methodology required local authorities to count the number of people sleeping rough if there were ten or more people sleeping rough in their local area. Local authorities with five or more rough sleepers were strongly encouraged to count the number of rough sleepers. This generally meant that a greater number of local authorities conducted a count rather than an estimate.

14 Homeless Link (2017) *Blog: Rough Sleeping Counts and Estimates – your questions answered,* 29th August: https://www.homeless.org.uk/connect/blogs/2017/aug/29/rough-sleeping-counts-and-estimates-–-your-questions-answered

15 Homeless Link (2017) *Counts and Estimates Toolkit 2017 Introduction and intelligence gathering*. London: Homeless Link.

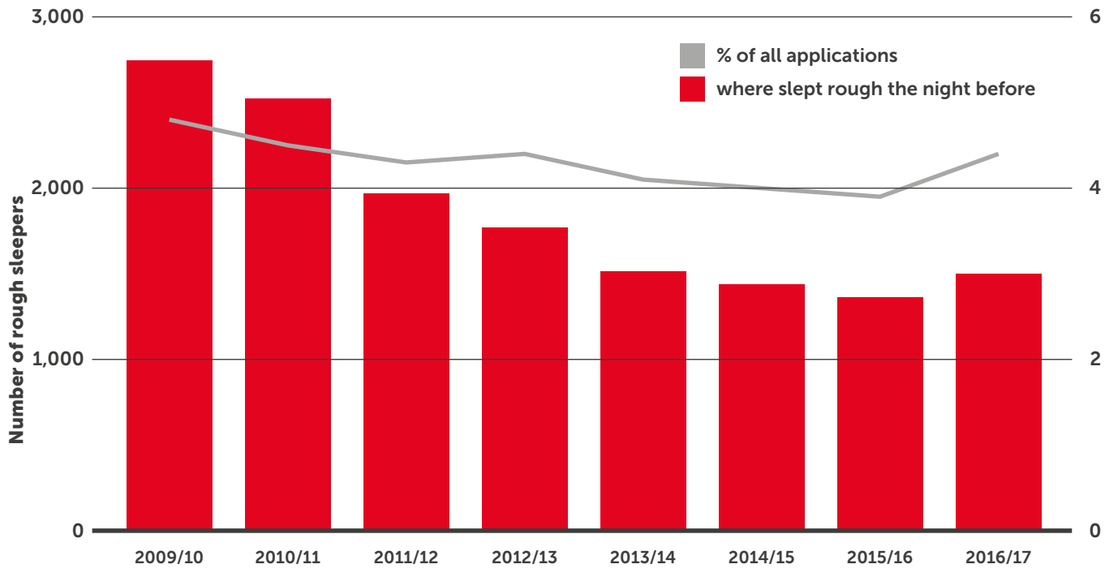
16 UK Statistics Authority (2015) *Statistics on Homelessness and Rough Sleeping in England*. London: UK Statistics Authority.

17 UK Statistics Authority (2015) *Statistics on Homelessness and Rough Sleeping in England*. London: UK Statistics Authority.

18 The Ministry of Housing, Communities and Local Government (2018) *Rough sleeping in England: autumn 2017*. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017

19 Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

Figure 8.2: Incidents of rough sleeping in Scotland



Source: Homelessness in Scotland: Annual Publication 2016-17

The Heriot-Watt University homelessness projection estimates for rough sleeping suggest a significantly higher level in England.[20] Their estimates consider official data and sources including CHAIN data, household surveys and academic studies. The data reveals a mid-range estimate of 8,000 rough sleepers in England in 2016; projected to rise to an estimated 13,000 within the next decade.[21]

Scotland

Published rough sleeping figures in Scotland relate to the number of people annually applying for assistance from their local authority. These people will have reported that they slept rough the night before their application and in the prior three months. Latest figures show that in the reporting year 2016/17, 1,500 people slept rough in Scotland. This is a ten per cent increase on the previous year, as shown in figure 8.2.[22]

These figures are a measure of the 'flow' of people over a year, rather than the 'stock' or 'point in time' figures in England that relate to a given night. The crucial flaw in the published data is that only those applying for local authority assistance, who report sleeping rough the night before or in the last three months, will be counted. Those that do not make a homelessness application will not appear in the statistics. Evidence of effective ways of tackling rough sleeping shows that services must go out to people through 'assertive outreach' rather than waiting for people to come to them.[23]

20 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.
21 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.
22 Scottish Government (2017) *Homelessness in Scotland: Annual Publication 2016/17.* Edinburgh: Scottish Government.
23 Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

Table 8.3: Rough sleeping across the four cities of Scotland

	at least once during the last 3 months				the night before			
	2015 – 16	2016 – 17	Change 2015 – 16 to 2016 – 17		2015 – 16	2016 – 17	Change 2015 – 16 to 2016 – 17	
			N	%			N	%
Scotland	2,425	2,620	195	8%	1,360	1,500	140	10%
Aberdeen City	165	120	-45	-27%	100	70	-30	-32%
Dundee City	180	185	5	3%	110	105	-5	-6%
Edinburgh, City of	260	235	-25	-9%	110	115	5	5%
Glasgow City	430	425	-5	-2%	370	400	30	8%

Source: Homelessness in Scotland: Annual Publication 2016-17
Note: Disclosure control has been applied to this table. All cells have been rounded to the nearest 5.

Homelessness projections from Heriot-Watt University estimate that on any given night there are 800 people sleeping rough across Scotland.[24] This represents a fall of 100 people since 2011, and is projected to fall by another 100 people over the next decade, before rising after that. These are more robust estimates, using wider survey data where people report experiences of rough sleeping.

The Scottish Government recently established a Homelessness and Rough Sleeping Action Group to make informed recommendations about tackling the problem.[25] The group has recommended establishing new and more robust methods for gathering and recording rough sleeping data. Recommendations include allowing data to be collected and used from different contributors within the voluntary and statutory sectors. The group also recommends the nuancing of data, allowing different subgroups of rough sleepers/homeless people to be captured. These subgroups should include: women experiencing domestic abuse; LGBT young people; people experiencing relationship breakdown, and people migrating from outside of Scotland.

Wales

Although Wales has the smallest rough sleeping population in Britain, the problem continues to increase.

The Welsh Government figures reflect two separate measures. First, local authorities estimate over a two-week period, and second, a count on one night. These measures were most recently conducted in October and November 2017. The two-week estimate reported 345 rough sleepers, representing a ten per cent increase on the previous year. The count reported 188 people, an increase of more than a third compared to the previous year.[26]

The Welsh Government is clear about the limitations of the published data.

24 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.
25 Scottish Government (2018) *Ending Rough Sleeping in Scotland: An interim report on the activity of the Homelessness and Rough Sleeping Action Group Homelessness and rough sleeping action group*. https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group
26 Welsh Government (2017) *National Rough Sleeper Count*. http://gov.wales/statistics-and-research/national-rough-sleeping-count/?lang=en

Table 8.4: Projections of rough sleeping across Great Britain

	2011	2016	2021	2026	2031	2036	2041
England	5,000	8,000	9,000	11,000	13,000	14,000	19,000
Scotland	900	800	700	700	800	800	900
Wales	200	300	300	300	300	300	400
Total	6,100	9,100	10,000	12,000	14,100	15,100	20,300

Source: Bramley 2017

They point out, 'there are a range of factors which can impact on single-night counts of rough sleepers, including location, timing and weather.' The count carried out in November 2017 in Wales is essentially a snapshot estimate. It can only provide a very broad indication of rough sleeping levels on the night of the count.[27] They also acknowledge that there are limitations to the count in rural and coastal areas, where the sparse population makes counting difficult.

The Welsh Government and the Welsh homelessness charity, The Wallich, have been working together to develop the Street Homeless Information Network (SHIN). SHIN will collect data from a network of organisations across Wales that support rough sleepers. It will combine their data to enable more in-depth, consistent and continual analysis of rough sleeping trends across Wales.[28]

Heriot-Watt University projection figures for Wales estimate a 2016 figure of 300 rough sleepers across the country. This reflects a rise of 50 per cent since 2011.[29]

Reviewing the evidence – what works to end rough sleeping

The evidence base

In 2017, Crisis commissioned Cardiff University and Heriot-Watt University to carry out an international evidence review of 'what works' to end rough sleeping. The objective was to identify the interventions to be used and/ or expanded.

The review was published in December 2017.[30] It examined a range of different interventions and suggested five key themes to help underpin the approach taken to prevent and end rough sleeping.

1 **Recognise the diverse needs of individual rough sleepers** – address each rough sleeper's housing and support needs and their different entitlements to publicly-funded support.

2 **Take swift action** – to prevent or quickly end street homelessness, through interventions such as No Second Night Out, thereby reducing the number of rough sleepers who develop complex needs and potentially become entrenched.

3 **Employ assertive outreach leading to a suitable accommodation offer** – by identifying and reaching out to rough sleepers and offering suitable housing as part of the package of support.

4 **Be housing-led** – offering swift access to settled housing, including the use of Housing First.

5 **Offer person-centred support and choice** – via a client-centred approach based on cross-sector collaboration and commissioning.

In addition to the 2017 Cardiff University and Heriot-Watt University 'what works' review of rough sleeping, we also commissioned the Social Care Institute for Excellence (SCIE) to undertake a broader examination of the evidence on homelessness interventions.[31] This piece of work also helps inform these recommendations.

Supported accommodation

Supported accommodation and homeless hostels are currently the backbone of homelessness services to address rough sleeping, helping people recover and rebuild their lives.

There are 35,727 bed spaces available in homelessness accommodation projects across England.[32] This figure does not include the bed spaces available in emergency shelters (eg winter night shelters) and in very specialist accommodation for people with substance misuse, mental health needs and a history of offending.

In Scotland, most homeless households are housed in self-contained temporary furnished accommodation, including former rough sleepers. However, 4,237 households continue to live in hostels, bed and breakfasts and other accommodation. These can vary considerably in quality and levels of support provided, and are often used to house those with more complex needs.[33] Data on the number of bed spaces in Wales is not readily available.

Supported accommodation varies substantially in relation to the size and support provided. For example, the term can describe very basic hostels simply providing people with an emergency bed to get them off the streets as quickly as possible. They offer very little additional support.

But more commonly, supported accommodation for homeless people tends to be clustered temporary accommodation. Providers often deliver a wide range of services to people before they move into permanent housing. The support could include assistance regarding mental and physical health and substance misuse, and pre-tenancy training and employment support. For people with significantly higher support needs, more specialist forms of temporary supported accommodation can act as a longer-term housing option.

Over the past ten years, hostels and supported housing units have been generally decreasing in size. More than half the projects in England have 20 bed spaces or fewer, providing scope for a more personalised form of support. In 2016, two thirds of people (66%) who left homeless accommodation in England stayed there for six months or less. A quarter (26%) stayed for less than a month and

27 Welsh Government (2017) *National Rough Sleeper Count.* http://gov.wales/statistics-and-research/national-rough-sleeping-count/?lang=en

28 Welsh Government (2018) *Inquiry into rough sleeping.* http://senedd.assembly.wales/ieIssueDetails.aspx?IId=20843andOpt=f

29 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.

30 Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

31 SCIE (2018) *A rapid evidence assessment of what works in homelessness services. Social Care Institute for Excellence.* London: SCIE.

32 Homeless Link (2018) *Support for single homeless people in England Annual Review 2017.* London: Homeless Link.

33 Scottish Government (2017) *Homelessness in Scotland: 2016-17.* http://www.gov.scot/Publications/2017/06/8907

three per cent stayed for two years or more.[34] Research shows a similar trend in Scotland.[35]

In some supported accommodation, a 'staircase model' is applied. This means that someone must engage with support services and demonstrate housing readiness before they can move to permanent accommodation. There is little evidence available on the extent to which this model is currently applied within the UK context.

Our 2017 'what works' review found limited UK evidence evaluating the effectiveness of supported accommodation in moving people into permanent housing and ending their homelessness. The review identified a clear need to expand the evidence base.

Most evidence comes from the hostel system outside the UK. This can vary substantially and often does not provide as personalised packages of support. Consequently, this evidence does not usefully assess the impact of hostels and supported accommodation on ending homelessness in Great Britain.

Key informants for the review could see a role for supported housing. They said when provided as a longer-term solution outside of a 'staircase model', it can work well, although it is currently often hampered by a lack of move-on accommodation.[36]

A study from England in 2011, identified in the review, interviewed 400 people. It covered them moving from temporary (a range of types) to permanent accommodation. The focuses were: at the point before the people moved, six months after their move, and then 15 to 18 months afterwards. Seventy-three per cent of respondents remained housed in the original accommodation in which they were rehoused across the 18-month period, and eight per cent moved to a new tenancy.[37]

The 'what works' review found that people with high support needs are sometimes forced to go into large hostel accommodation because of a shortage of suitable places. This can exacerbate the problems they experience, and also present difficulties for other people living in the same accommodation project.[38]

There were also several reports recording people who would rather stay on the streets than use hostel accommodation.[39] In 2017, the homelessness charity Groundswell conducted a peer-led research project for the Hammersmith and Fulham Commission on Rough Sleeping. As part of this project they interviewed 108 people with recent experience of sleeping rough.[40]

34 Homeless Link (2017) *Support for single homeless people in England Annual Review 2016*. London: Homeless Link.
35 Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. and Watts, B. (2015) *The homelessness monitor: Scotland 2015*. London: Crisis; Fitzpatrick, S., Pawson, H., Bramely, G. and Wilcox, S. (2012) *The homelessness monitor: Scotland 2012*. London: Crisis.
36 Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.
37 Crane, M., Warnes, T. and Coward, S. (2011) *The FOR-HOME Study Moves to independent living Single homeless people's experiences and outcomes of resettlement*. Sheffield: University of Sheffield.
38 St Mungo's (2009) *Down and Out? The Final Report of St Mungo's Call 4 Evidence: Mental Health and Street Homelessness*. London: St Mungo's.
39 Littlewood, M., Bramley, G., Fitzpatrick, S., Wood, J. (2017) *Eradicating 'Core Homelessness' in Scotland's Four Largest Cities: Providing an Evidence Base and Guiding a Funding Framework*. Edinburgh: Heriot-Watt University and Social Bite.
40 Groundswell (2018) *An End to Street Homelessness? A Peer-led Research Project for the Hammersmith and Fulham Commission on Rough Sleeping*. London: Groundswell.

Of the 108 interviewees, only two people stated that they wanted to live in a homeless hostel. In two separate focus groups, the consensus was that people would prefer to be in prison rather than in a hostel. Resistance to moving into hostels was common. They explained that the chaotic environment, poor quality accommodation and limited opportunities for moving on were key deterrents.

In 2016, 30 per cent of people in accommodation projects in England were ready to move on, but had not yet done so. Of this group, 27 per cent had been waiting for six months or longer.[41] In Scotland, the average duration of stay in temporary accommodation is 24 weeks, and 12 per cent of households remain there for a year or more. This applies to all households living in some form of temporary accommodation.[42] This is largely due to a lack of affordable move-on accommodation.

More recently there has been a shift towards the practice of harm reduction in hostels and supported accommodation. This places less emphasis on the need for complete abstinence from drugs and alcohol before someone can access permanent accommodation.[43] Most hostels link people to drug and alcohol services. A project would not normally evict someone because they had a drug and alcohol misuse problem.

Last year, however, the Homeless Link Annual Review of Single Homelessness Support in England found the following:[44]

- 42 per cent of homelessness accommodation projects had refused a client access to services because their needs were too complex
- 59 per cent said they had turned people away because their needs were too high
- 71 per cent had turned someone away because they were deemed too high risk.

Further evidence from the UK suggests that hostel staff spend a disproportionate amount of time managing the behaviour of people with highly complex needs. This can stop them offering more meaningful one-to-one support.[45]

This evidence comes at a time when investment in homelessness accommodation has been declining. Last year 39 per cent of homeless accommodation projects in England reported a decline in their funding from the previous year.[46] Aside from Housing Benefit contributions, funding for homelessness accommodation at a local level comes from housing-related support (formerly known as Supporting People).

41 Homeless Link (2017) *Support for single homeless people in England Annual Review 2016*. London: Homeless Link.
42 Shelter Scotland (2017) *The use of temporary accommodation in Scotland*. Edinburgh: Shelter Scotland.
43 Centre for Social Justice (2017) *Housing First- housing led solutions to rough sleeping and homelessness*. London: Centre for Social Justice.
44 Homeless Link (2018) *Support for single homeless people in England Annual Review 2017*. London: Homeless Link.
45 Centre for Social Justice (2017) *Housing First- housing led solutions to rough sleeping and homelessness*. London: Centre for Social Justice.
46 Homeless Link (2018) *Support for single homeless people in England Annual Review 2017*. London: Homeless Link.

While spending specifically on homelessness has increased (by 13%) since 2010, reflecting the priority given to this area by government, overall spending on housing dropped by 46 per cent in real terms, with an even larger cutback (67%) in the Supporting People programme.[47] Homeless accommodation projects must now provide services to an increasing number of people despite declining budgets.

The Welsh Government's decision to merge Supporting People with a wider series of non-housing grants and remove longer-term certainty about the funding level presents a similar risk, and is an area of major concern to the sector.[48] To date, similar scale cuts have not occured in Scotland. This is largely because temporary accommodation is primarily funded through Housing Benefit, and homelessness applications have been increasing.[49]

Housing First

Housing First is the most important innovation in homelessness service design in the last few decades. It is proven to end homelessness for at least 80 per cent of people with high support needs.[50]

The Housing First model prioritises rapid access to a stable home, from which other support needs are addressed through coordinated and intensive support. Permanent housing is provided without a test for housing readiness. Maintaining the tenancy is not dependent on the tenant using support services.

Housing First is based on the principle that housing is a human right. It focuses first on immediate access to a settled and secure home, placing this above goals such as sobriety or abstinence.[51] The model is specifically tailored for homeless people with complex needs. Housing First centres on choice and control – giving rights and responsibilities back to people who may have been repeatedly excluded. The model depends on giving access to stable and affordable housing. But it also means people can use a wide range of services to get personalised support when they need it and in their chosen format.[52]

There is overwhelming evidence of Housing First's positive role in helping people with complex needs keep permanent accommodation and improve other issues related to their health and wellbeing. The volume of evidence far exceeds that of any other intervention,[53] and includes a mix of large-scale Randomised Control Trials (RCTs) and smaller studies.

Housing First has particularly high housing retention rates of 80 per cent.[54] It also has led to reductions in offending and improved mental health.[55] It has not been shown to produce the same

47 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2017) *The Homelessness Monitor: England 2017*. London: Crisis.

48 National Assembly for Wales Equality, Local Government and Communities Committee (2018) *Life on the streets: preventing and tackling rough sleeping in Wales*. Cardiff: National Assembly for Wales.

49 Shelter Scotland (2016) *Funding Homelessness Services in Scotland*. Edinburgh: Shelter Scotland.

50 Housing First Europe Hub (2018) *Housing First Guide*. http://housingfirsteurope.eu/guide/what-is-housing-first/introducing-housing-first/

51 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

52 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales*. London: Crisis and Homeless Link.

53 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

54 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

55 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

results in relation to physical health, though there is no reason to suggest these outcomes are any worse than in traditional approaches.[56]

Housing First was developed in the US by the organisation Pathways to Housing, and is being delivered across the world. Perhaps the most striking successful example is in Finland. Here, Housing First, as part of a wider homelessness strategy, has reduced rough sleeping to very low numbers; all forms of homelessness have reduced to a 'functional zero'.[57]

Key to Housing First's large scale implementation in Finland has been the role of a national housing association, the Y-Foundation. This organisation specifically focuses on providing housing to people who have experienced homelessness. Between 2008 and 2015, approximately 3,500 new dwellings were built for people experiencing homelessness. And a total of 350 new social work professionals were employed to work specifically with them.[58] According to FEANTSA, the European Federation of National Organisations working with the Homeless, Finland is the only

56 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

57 The concept of functional zero can be summarised as a state in which experience of homelessness is rare and, where it does occur, short term.

58 The Centre for Social Justice (2017) *Housing First: Housing led solutions to rough sleeping and homelessness*. London: The Centre for Social Justice.

European Union (EU) country in which homelessness continues to decrease.[59]

In Denmark, the national Homelessness Strategy from 2009-2013 introduced one of the first large-scale Housing First programmes in Europe. It housed more than 1,000 people, and achieved housing retention rates of between 74 per cent and 95 per cent.[60]

Further evidence of high levels of housing retention is found across Europe, North America and Australia. For example, the Canadian RCT study into the two-year 'Chez Soi' programme found that Housing First service users spent 73 per cent of their time stably housed. [61]This is compared to 32 per cent of those receiving treatment as usual in the Canadian homelessness system.

Similarly, two published studies on the Street to Home project in Australia show that after one year 95 per cent of clients had kept their housing in Brisbane. In Melbourne, 80 per cent had been housed for one year or longer.[62]

There are high tenancy sustainment rates for international Housing First projects. However, we cannot compare its success to studies measuring projects alongside treatment as usual outcomes in Great Britain. This is because the treatment is not always comparable with services offered across different parts of Britain.

In addition to strong housing sustainment rates, Housing First schemes throughout the world have also been shown to have wider positive impacts on people's lives.

The Street to Home Melbourne evaluation found that there was significant improvement in the participants' physical and mental health in the first 12 months. Sixty three percent of people said their general health was better, and 24 per cent reported moderate to extreme bodily pain after 12 months, compared to 54 per cent when first interviewed.[63] The number of participants hospitalised dropped by 21 per cent. Participants were regularly interviewed, starting at three months before being found a home and up until two years afterwards.

In a study of five projects in Europe, improvements in mental health problems were reported for most participants in Amsterdam (no exact figures supplied) and Glasgow (50 per cent).[64] In Lisbon there was a 52 per cent reduction in participants being admitted to psychiatric hospitals from the start of the project to the three-year follow-up.[65]

Similarly, while evidence on reductions in substance misuse is more mixed, on balance the literature demonstrates that Housing First is equally and sometimes more effective than a treatment-first approach.[66]

59 FEANTSA (2016) '*News: Finland leads the way on reducing homelessness with Housing First*' 14th November: http:// www.feantsa.org/en/news/2016/11/14/finland-leads-the-way-on-reducing-homelessness-with-housing-first?bcParent=27

60 Benjaminsen, L. (2013) 'Policy Review Up-date: Results from the Housing First based Danish Homelessness Strategy', *European Journal of Homelessness*. 7.2, pp. 109-131.

61 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. Crisis: London

62 Johnson, G. and Chamberlain, C. (2015) *Evaluation of the Melbourne Street to Home programme: Final Report.* Melbourne: HomeGround Services.

63 Johnson, G. and Chamberlain, C. (2015) *Evaluation of the Melbourne Street to Home programme: Final Report*. Melbourne: HomeGround Services.

64 Johnsen, S. (2013) *Turning Point Scotland's Housing First Project Evaluation: Final Report*. Glasgow: Turning Point Scotland.

65 Ornelas, J. (2013) *Casas Primeiro, Lisboa. Final Report for Housing First Europe Project.* Lisbon: CRESCER.

66 Mackie,P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

Both qualitative and quantitative research shows that Housing First participants are less likely to be involved in crime.[67] Woodhall-Melnik and Dunn report in their systematic review that the evidence on Housing First and reductions of criminal activity is very strong.[68] Anti-social behaviour also seems to decline, but is far less studied in the literature.

The evidence from Housing First projects in the UK is largely in line with international data. It shows how, if adopted more widely, this approach could significantly reduce homelessness for people with high level needs, as well as improving health and wellbeing outcomes.

In 2015, the University of York published findings from a study of nine Housing First services.[69] They found that 74 per cent of current service users had been successfully housed for one year or more. Data collected from 60 Housing First service users showed that:

- 43 per cent reported 'very bad or bad' physical health a year before using Housing First, falling to 28 per cent when asked about current health
- 52 per cent reported 'bad or very bad' mental health a year before using Housing First, falling to 18 per cent when asked about current mental health
- 71 per cent reported they would 'drink until they felt drunk' a year prior to using Housing First, falling to 56 per cent when asked about current use
- 66 per cent reported drug use a year prior to using Housing First, falling to 53 per cent when asked about current use.

For a full exploration of the potential and evidence base for Housing First, see Chapter 9 'The role of Housing First in ending homelessness'.

Outreach services

Street outreach teams are often the first point of contact for rough sleepers. They work to move people off the streets as quickly as possible and help them access support services and accommodation.

No Second Night Out (NSNO) is an initiative, which has been widely rolled out across England since 2011 and aims to provide a place of safety for assessment of need, emergency accommodation and reconnections for people back to their community.[70] It primarily works to help move new rough sleepers off the streets as quickly as possible often using a single service offer. Outreach services, to help identify people on the streets, is one of the key elements of the approach.

For rough sleepers unable to prove a local connection, it is most likely that the offer will be a reconnection either within the UK, or back to their country of origin. The aim is that no rough sleeper should spend more than 72 hours at a NSNO hub, where they can access emergency accommodation along with washing facilities and food where necessary.

67 Mackie,P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

68 Woodhall-Melnik, J. R. and Dunn, J. R. (2016) 'A systematic review of outcomes associated with participation in Housing First programs', *Housing Studies*. 31(3), pp. 287–304.

69 Pleace, N. and Bretheton J. (2015) *Housing First in England: An Evaluation of Nine Services*. York: Centre for Housing Policy.

70 Homeless Link (2014) *Adopting the No Second Night Out Standard - Developing a service offer for those new to the streets.* London: Homeless Link.

At present, there is relatively limited evidence regarding the intervention, with only smaller scale evaluations, which have focused on short-term outcomes. NSNO is, however, effective in helping to find people temporary accommodation.

Rates of securing and retaining accommodation tend to be higher in London than in the rest of England.[71] But evidence suggests that more favourable reports, relating to the support and aftercare received, come from people using the service outside of London[72] compared with those in the capital.[73]

The 'what works' review found that service providers recognised that NSNO needed to serve a wider client group than those who are new to the streets. Some areas have widened the eligibility criteria to provide help for longer-term rough sleepers.

The 'what works' review also considered the role of more assertive forms of outreach. Assertive outreach teams aim to work with people sleeping rough for a long time and have the highest levels of support needs. The teams use an integrated model of support, drawing on a range of services including drugs, alcohol and mental health.

The primary objective of assertive outreach is to rehouse people in permanent accommodation. Teams work with people using an open-ended and persistent approach. This is not to be confused with coercive or punitive approaches.

There is some positive evidence on the impacts of assertive outreach, including evaluations of the Rough Sleepers Unit (RSU) and Rough Sleepers Initiative programmes in England and Scotland, and of Street to Home in Australia.[74] The use of the approach under the RSU contributed to reducing the number of rough sleepers by approximately two thirds within three years.

Personalised budgets

In addition to a more personalised assertive form of outreach service, the review also identified strong evidence for using personal budgets to support rough sleepers. A personalised budget is an agreed amount of money allocated to someone by a local authority, or other funding stream. It follows an assessment of the person's housing, care and support needs and is designed to help resolve their homelessness.

Personal budget use was found to be particularly helpful for long-term rough sleepers with high support needs. The budgets were also very helpful in supporting people to move into accommodation and are associated with long-term savings for a range of public agencies.[75] The report highlighted the clear need for greater investment in personalised budgets for rough sleepers and the need for more guidance for those working in the homelessness sector on using them.

71 Homeless Link (2014) *No Second Night Out across England.* London: Homeless Link.
72 Butler, D., Brown, P. and Scullion, L. (2014) *No Second Night Out: Derby City and Derbyshire. An evaluation for Riverside English Churches Housing Group*. Salford: University of Salford; Butler, D., Shannon, M. and Brown, P. (2015) *No Second Night Out: Salford and gate buddies: an evaluation for riverside ECHG Salford*. Salford: University of Salford; Turley, H., Scullion, L. and Brown, P. (2014) *No Second Night Out Greater Manchester and Street Buddies. An Evaluation for Riverside Salford*. Salford: University of Salford.
73 Jones, J., Hough, J. and Broadway Homelessness and Support (2013) *No Second Night Out: A study of medium term outcomes: Summary report*. Broadway Homelessness and Support: London.
74 Randall, G. and Brown, S. (2002) *Helping Rough Sleepers Off the Streets: A Report to the Homelessness Directorate.* London: ODPM; Fitzpatrick, S., Pleace, N. and Bevan, M. (2005) *Final evaluation of the Rough Sleepers Initiative,* Edinburgh: Scottish Executive; Parsell, C. (2011) *Responding to People Sleeping Rough: Dilemmas and Opportunities for Social Work*. Australian Social Work, 64(3): 330-345; Phillips R. and Parsell C. (2012) *The role of assertive outreach in ending 'rough sleeping'*. AHURI Final Report No.179. Melbourne: Australian Housing and Urban Research Institute
75 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

Reducing rough sleeping – looking to the past

By the late 1980s rough sleeping had visibly risen in London and other cities. No official data on levels of rough sleeping were available, but by 1990 homelessness charities estimated that 3,000 people were sleeping rough on any one night.[76] Locations such as 'Cardboard City' next to Waterloo Station in London had grown in size and notoriety, and there were reports of 'shanty towns springing up around the country'.[77]

In 1990, Housing Minister George Young established the first Rough Sleepers Initiative (RSI), which was a three-year programme for London. It involved £30 million of funding to increase outreach work and provide emergency hostel beds and other forms of temporary and permanent accommodation for people sleeping rough. This was extended for another three years in 1993, and an additional £60 million allocated.

By this time political attention and competition on the issue had increased, with the Labour Party stating that homelessness was 'the visible symbol of all that was wrong with our country'.[78]

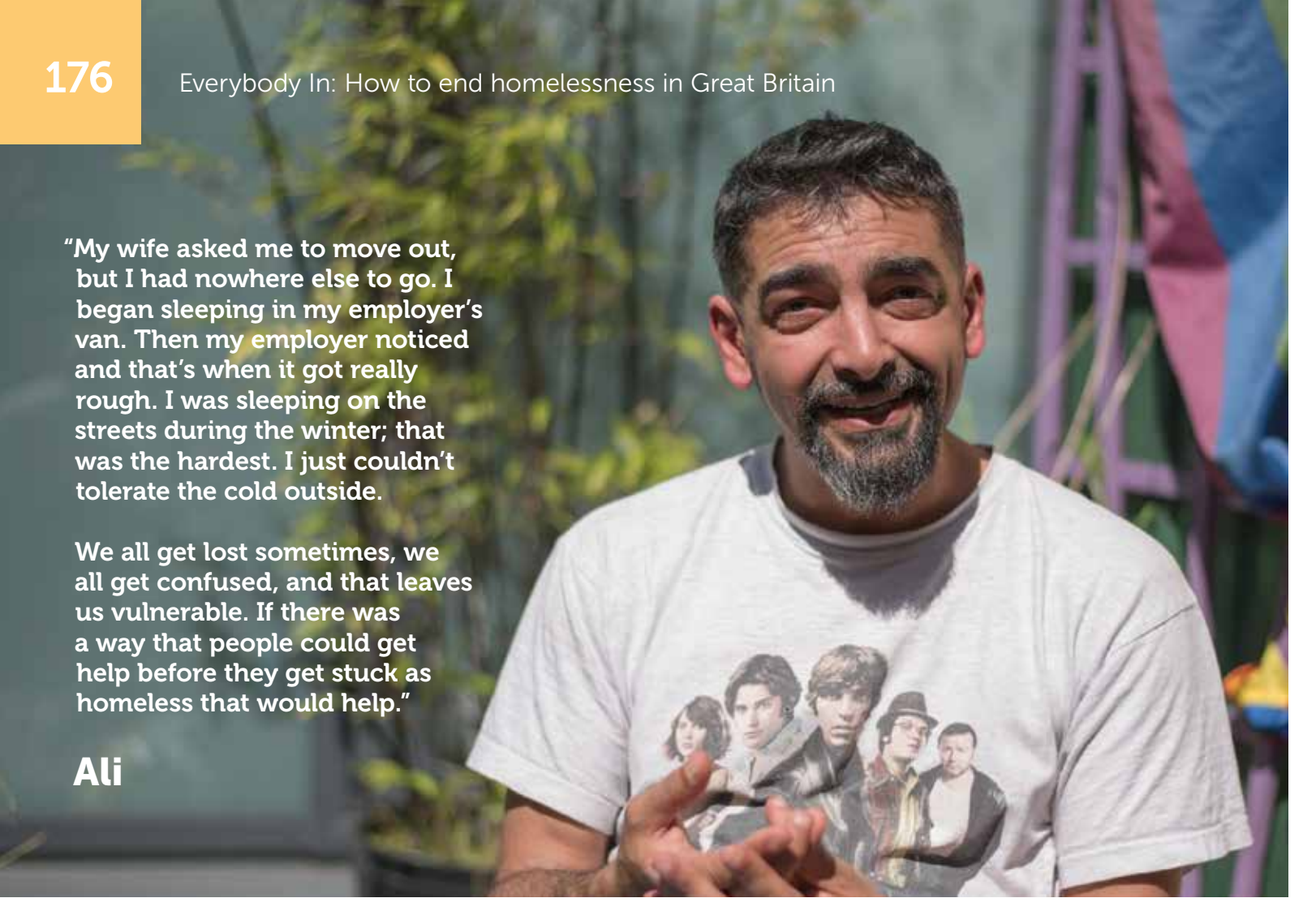
In 1996, as attention turned to a third phase of the RSI, ministers were faced with the need to extend the programme and funding outside London. But the lack of data about the geography and scale of rough sleeping made it difficult to allocate budgets reliably. From 1996, local authorities were asked to provide annual estimates to the Westminster Government and so the first 'official' estimates of the scale and distribution of rough sleeping were made.[79]

The change of government in 1997 saw a continuation of the work to tackle rough sleeping. The Major Government handed the lessons of the previous seven years to the Blair administration, alongside a new baseline of data and data collection from which to progress.

In 1998, the newly-formed Social Exclusion Unit published a report into rough sleeping which, to some extent, broke from previous thinking on the issue.[80] The report diagnosed causes to the problem that were wider than a lack of access to housing. This social exclusion agenda sought to tackle structural factors. These included unemployment, low incomes, inter-generational poverty, and individual impacts such as mental health, addiction and family breakdown.

With this approach came newly prescribed solutions. They included prevention measures for care and prison leavers, and a focus on multi-agency action at a local level,[81] overseen by a national coordinating body. And so, in 1999, the RSU was established and handed the target of reducing rough sleeping in England by two-thirds by 2002. The then deputy director of Shelter, Louise Casey, was appointed to lead the unit.

76 Crisis (2017) *Not Yet Home: A History of Britain's attempts to Tackle Homelessness*. London: Crisis.
77 Ilott, O., Randall, J. and Norris, E. (2016) *Making Policy Stick. Tackling long-term challenges in government*. London: Institute for Government.
78 Ilott, O., Randall, J. and Norris, E. (2016) *Making Policy Stick. Tackling long-term challenges in government*. London: Institute for Government.
79 House of Commons Library (2016) *Rough Sleeping (England). briefing paper.* London: House of Commons.
80 Social Exclusion Unit (1998) *Rough Sleeping.* London: Cabinet Office.
81 House of Commons Library (2016) *Rough Sleeping (England). briefing paper.* London: House of Commons.



The RSU achieved its target a year early. It did this by applying a range of methods. These included expanding hostel provision, hiring new specialists in mental health and addiction services and establishing outreach teams to contact and assess rough sleepers. It also particularly focused on preventing rough sleeping among those leaving the armed forces, the care system, and prison.

Crucial to the success of the RSU was the political importance and authority ascribed to both the target to reduce rough sleeping, and of the RSU itself. It was given cross-departmental authority in Whitehall, and a reporting line to the Prime Minister.[82]

The Scottish Rough Sleepers Initiative was established in 1997. In 1999 a target was set to make sure no one had to sleep rough in Scotland by 2003. Because of the initiative, the numbers of people sleeping rough that presented to services fell by over a third between 2001 and 2003.

While the target was not met, the initiative led to enhanced support in cities, while in some areas rough sleeping services were set up for the first time. The initiative also drove political and cultural changes within local authorities. This led to a much stronger strategic focus on rough sleeping and homelessness at both local and national level.[83]

82 Ilott, O., Randall, J. and Norris, E. (2016) *Making Policy Stick. Tackling long-term challenges in government*. London: Institute for Government.
83 Fitzpatrick, S., Pleace, N. and Bevan, M. (2005) *Final Evaluation of the Rough Sleepers Initiative. Scottish Executive*. York: The University of York.

8.2 What needs to change?

Preventing people sleeping rough in the first place

A duty to provide immediate emergency accommodation to all those with nowhere safe to stay

Problem
Many rough sleepers and those at risk of living on the streets are not entitled to housing or emergency accommodation.

In Scotland, all eligible households are entitled to temporary accommodation until the council can make them an offer of settled housing.

No such provision exists for households not in priority need in England and Wales, even when someone is already sleeping rough or at immediate risk of doing so.

Solution
Chapter 13 'Homelessness legislation' details the ideal legal framework for tackling homelessness and makes clear that England and Wales should follow Scotland's lead in abolishing priority need. This change would entitle rough sleepers to accommodation and a range of other benefits. It is not realistic however, to imagine this happening immediately.

Until priority need is abolished, there is an urgent need to protect people from sleeping rough. This should be via a local authority duty to provide emergency accommodation for anyone who is homeless and would otherwise have nowhere safe to stay. This measure was considered in the development of both *The Homelessness Reduction Act (2017)* and *The Housing (Wales) Act (2014)*. However, it was discounted on both occasions despite the obvious and growing need to tackle rough sleeping.

Impact
This change would entitle 8,300[84] rough sleepers (on a given night) in England and Wales access to temporary accommodation for 56 days. This provides a window of time for outreach and navigator teams to work with someone to prevent them sleeping rough and to move them into alternative accommodation.
In terms of timescales, in Wales there is already a clear gap in the legislation with regards to this group. Consequently, the Welsh Government should be looking to make this change immediately.

In England, we would recommend that this new duty is considered as part of the government's forthcoming rough sleeping strategy.

Responsibility for change
In addition to legislating for the new duty, relevant government departments in England and Wales would be responsible for introducing and funding duties to provide emergency accommodation for people with nowhere safe to stay.

84 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.

"My housing association said I had to move to another area, and the people I was employed with said they couldn't come and pick me up from that far away, so basically, I couldn't get to work anymore. When I told the job centre they said that it was classed as voluntarily leaving my job, which meant that when I applied for the Universal Credit they sanctioned me for a whole year as punishment… This is the first time I've been living on the streets. I literally live under a bridge. Just me. I'm an inch and a half away from getting wet when it rains but apart from that it's comfortable, it's all right. The way I see it, it's not going to get any worse. That's the way I look at it when I get up in the morning."

Nathan, Milton Keynes

Scaling up a 'No First Night Out' prevention approach

Problem
Many rough sleepers report asking their local authority for help before they slept out. Research carried out by St Mungo's found that 33 of the 40 rough sleepers they interviewed had slept rough the night after asking a local authority for help.[85]

In 2015/16, half of 672 UK nationals who used the No Second Night Out service had asked councils for help in the 12 months before they started sleeping rough.[86]

This shows that opportunities to provide advice, assistance and support to prevent people sleeping rough are routinely being missed.

Solution
The Welsh and the Westminster Governments should provide local authorities with additional funding to scale up No First Night Out (NFNO).[87] NFNO works with those at imminent risk of rough sleeping, to ensure they avoid a night out on the streets. The project utilizes a network of private rented sector partners to deliver housing solutions to meet a variety of needs.

An important element of the project is the collection of detailed data on individual journeys into homelessness. Using this data, the boroughs have been able to create categories of new rough sleepers. These have been used to determine the most appropriate response to end their homelessness.

Interventions have included intensive casework in the form of one-to-one support, mediation and gaining accommodation in the private rented sector. After its first six months, the pilot extended to finding potential clients via outreach work in the community. This was through, for example, job centres, libraries and the Citizens Advice Bureau.[88]

An evaluation of the pilot in 2016 found that this approach was effective in identifying the predictable routes people may take in being at risk of or experiencing rough sleeping.[89] With more certainty about these routes, the local authorities have tailored their prevention activities more effectively.

Impact
Extending the delivery and reach of NFNO would help encourage the culture change needed for English local authorities to meet the new duties in *The Homelessness Reduction Act (2017)*. This is particularly regarding assisting single people into accommodation, and enabling Welsh local authorities to meet their duties under *The Housing (Wales) Act (2014)*.

Local authorities should ensure that Housing Options services are available in settings like day centres that people who are at risk of, or are already, sleeping rough, are most likely to visit.

Responsibility for change
The Welsh and Westminster Governments would be responsible for providing funds for local authorities to deliver a NFNO approach in areas with a rough sleeping population.

85 St Mungo's (2016) *Nowhere safe to stay: the dangers of sleeping rough*. London: St Mungo's.
86 St Mungo's (2016) *Nowhere safe to stay: the dangers of sleeping rough*. London: St Mungo's.
87 Rice, B., and Reed. L. (2016) *No First Night Out – help for single homeless people (interim report)*. London: London Boroughs of Tower Hamlets and Hackney and the City of London.
88 Rice, B., and Reed. L. (2016) *No First Night Out – help for single homeless people (interim report)*. London: London Boroughs of Tower Hamlets and Hackney and the City of London.
89 Rice, B., and Reed. L. (2016) *No First Night Out – help for single homeless people (interim report)*. London: London Boroughs of Tower Hamlets and Hackney and the City of London.

Early interventions to prevent rough sleeping for people leaving prison, the care system and other state institutions

Problem

Certain traumatic life events and transitions can put people at much greater risk of homelessness and rough sleeping. These transitions include the points at which people leave or move on from a state institution. In many cases the exit points are predictable and so offer an opportunity for early intervention to prevent rough sleeping. These include people leaving prison, the armed forces, hospitals, and moving on from the care system.

Homeless and formerly homeless people told our national consultation undertaken to inform this plan that a lack of support to help people moving from either prison or care services is a significant cause of homelessness.[90] They reported moving into chaotic hostels when they were released from prison, and finding themselves trapped in the homelessness system without the support to move on and achieve stability.[91] The importance of providing advice and 'through the gate' support to help prevent homelessness for people leaving prison was also highlighted in the consultation.[92]

Research has shown that one third of care leavers become homeless in the first two years after leaving care[93] and 25 per cent of all single homeless people have been in care at some point in their lives.[94]

Similarly, homelessness is a key issue for survivors of domestic abuse. In 2016, 90 per cent of women in refuges were reported to have housing needs.[95] In 2015, 35 per cent of female rough sleepers left their homes due to domestic abuse.[96] In 2016/17, 6,650 people became homeless because of a violent relationship breakdown; accounting for 11 per cent of all homeless acceptances.[97]

Twenty per cent of prisoners surveyed in 2014 said they had no accommodation to go to on release.[98] Ministry of Justice (MoJ) research from 2012 found that 60 per cent of prisoners believed that having a place to live was important in stopping them from reoffending in the future.

The MoJ reported that 79 per cent of prisoners homeless before entering custody were reconvicted in the first year after release, compared with 47 per cent of those who were not homeless.[99] Scottish Government research from 2015 found that difficulties finding and retaining accommodation for people who had served short prison sentences is likely to increase their chances of reoffending.[100]

The Housing (Wales) Act (2014) removed automatic priority need for ex-offenders. Although at the same time the Welsh Government agreed a national pathway for people leaving the secure estate.[101] However, senior Welsh Government officials have accepted that the pathway had not been consistently or widely well implemented.[102]

Solution

National governments should ensure that Critical Time Intervention (CTI) forms a key part of national strategies to prevent and end homelessness for groups most at risk and that sufficient funding is made available to take this model to scale.

CTI is a time-limited, evidence-based practice that supports people who are vulnerable to homelessness during periods of transition. It is a 'housing-led' approach, providing rapid access to permanent accommodation. An intensive case management approach addresses the needs of people once they have security of accommodation.[103]

The SCIE study identified several groups of people leaving institutions for whom tenancy sustainment is significantly increased through the CTI model.[104] These included armed forces veterans, patients being discharged from hospital, young people, and prison leavers. Homeless Link reported that CTI as a targeted approach 'could arguably be transferred to any vulnerable group'.[105]

The CTI model is based on moving through clear, time-limited phases that are agreed and appropriate for the programme of support. A case manager will start to build a relationship while the person is still in an institution, such as prison, hospital or emergency housing. Consistent face-to-face contact with a case manager, and the security of housing offered have been identified as critical measures of success for the intervention.[106]

Impact

CTI has been widely adopted in the US, and in various European contexts, particularly in Denmark where the success rate for people maintaining their housing is 95 per cent.[107]

There are also several models and interventions in the UK which, using CTI principles, have worked well to reduce the risk of homelessness and rough sleeping.

90 Hughes, N. (2018) *Have your say policy consultation: summary report.* London: Crisis.
91 Uscreates (2018) *The lived experience of homelessness.* London: Crisis and Groundswell.
92 Hughes, N. (2018) *Have your say policy consultation: summary report.* London: Crisis.
93 Stein. M. and Morris, M. (2010) *Increasing the Number of Care Leavers in 'Settled, Safe Accommodation.* London: C4EO.
94 Mackie, P. and Thomas, I. (2014) *Nations apart? Experiences of single homeless people across Great Britain.* London: Crisis.
95 Women's Aid (2016) *Meeting the Needs of Women and Children, Annual Survey.* Bristol: Women's Aid Federation of England.
96 Moss, K. and Singh, P. (2015) *Women Rough Sleepers in Europe: Homelessness and Victims of Domestic Abuse.* London: Policy Press.
97 The Ministry for Housing, Communities and Local Government (2018) *Live Tables on Homelessness,* Table 774. London: MHCLG.
98 Brunton-Smith, I. and Hopkins, K. (2014) *Prisoners' experience of prison and outcomes on release: Waves 2 and 3 of SPCR.* London: Ministry of Justice.
99 Williams, K., Poyser, J. and Hopkins K. (2012) *Accommodation, homelessness and reoffending of prisoners: Results from the Surveying Prisoner Crime Reduction (SPCR) survey.* London: Ministry of Justice.

100 The Scottish Government (2016) *Housing and Reoffending: Supporting people who serve short-term sentences to secure and sustain stable accommodation on liberation.* Edinburgh: The Scottish Government.
101 Welsh Assembly (2015) *National pathway for homelessness services to children, young people and adults in the secure estate.* http://gov.wales/topics/housing-and-regeneration/services-and-support/homelessness/national-pathway/?lang=en
102 Welsh Assembly, Equality, Local Government and Communities Committee (2018) *Life on the streets: preventing and tacklingrough sleeping in Wales.* 15th May: http://www.assembly.wales/laid%20documents/cr-ld11517/cr-ld11517-e.pdf
103 Benjaminsen, L. (2013) *Sustainable Ways of Preventing Homelessness. Peer Review in Social Protection and Social Inclusion programme.* Copenhagen: ÖSB Consulting.
104 SCIE (2018) *A rapid evidence assessment of what works in homelessness services.* London: SCIE.
105 Homeless Link (2015) *Preventing Homelessness to Improve Health and Wellbeing.* London: Homeless Link.
106 SCIE (2018) *A rapid evidence assessment of what works in homelessness services.* London: SCIE.
107 Benjaminsen, L. (2013) *Sustainable Ways of Preventing Homelessness. Peer Review in Social Protection and Social Inclusion programme.* Copenhagen: ÖSB Consulting.

A 2012 report from Homeless Link and St Mungo's found that more than 70 per cent of homeless people had been discharged from hospital back onto the street.

In response, the Westminster Government set up a £10 million Homeless Hospital Discharge Fund. The fund's key aim was to secure safe discharge from hospital after treatment and secure appropriate facilities for those requiring ongoing medical support to allow time for recovery.[108] Fifty two projects were put in place which varied considerably in terms of size and target client group. But all featured partnership working across health and housing and a link worker that helped people secure and sustain accommodation and get help from other support services.

Overall 33 projects returned complete data:

- 69 per cent of patients were discharged into suitable accommodation
- 55 per cent of patients received health support on discharge
- 58 per cent of patients received housing support on discharge
- Of those patients admitted into hospital, only 28 per cent were readmitted within 30 days of a prior admission.[109]

It should be noted however that despite successful outcomes, services found it very difficult to get continuation funding from Clinical Commissioning Groups (CCGs) after the Hospital Discharge Fund from Central Government came to an end.[110]

In North Wales, a study into the housing and support needs of people leaving prison revealed strong findings about the need for on-going resettlement support upon release. This was in many ways akin to the CTI model.[111]

Recent recommendations from the Homelessness and Rough Sleeping Action Group in Scotland have also stressed the importance of the key principles of CTIs in reducing rough sleeping. These included 'rapid rehousing' to be adopted by default across Scotland. Recommendations also stated that quick agreement of plans is vital in protecting people from homelessness who are at highest risk of rough sleeping. These include people leaving public institutions such as prison, mental health services and the armed forces.[112] The Scottish Government and relevant partners have also developed the Scottish quality standards housing advice, information and support for people in and leaving prison (SHORE).[113] This is to help ensure that all prisoners can move into settled housing when they are released from custody.

People with lived experience of homelessness who participated in the national consultation undertaken to inform this plan also emphasised the need for a system designed to move people through quickly and efficiently.

108 Homeless Link (2015) *Evaluation of the Homeless Hospital Discharge Fund*. London: Homeless Link.
109 Homeless Link (2015) *Evaluation of the Homeless Hospital Discharge Fund*. London: Homeless Link.
110 Homeless Link (2015) *Evaluation of the Homeless Hospital Discharge Fund*. London: Homeless Link.
111 Stirling, T. and Humphreys, C. (2017) *Housing: Necessary but not sufficient. A regional perspective*. http://www.conwy.gov.uk/en/Resident/Housing/Advice-and-Support/assets/documents/Researching-Support-Services-for-People-Leaving-Prison-in-North-Wales-Final-Report.pdf
112 Scottish Government (2018) *Ending Rough Sleeping in Scotland: An interim report on the activity of the Homelessness and Rough Sleeping Action Group*. https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group
113 Scottish Quality Standards (2017) *Housing Advice, Information and Support for people in and leaving prison: Sustainable Housing Outcomes on Release for Everyone*. Scotland: Scottish Prison Service.

Strictly enforced time limits and regular updates are required to ensure people are not left stuck in limbo.[114]

Responsibility for change
To underpin funding for CTI, the Westminster, Welsh and Scottish Governments will need to strengthen their respective homelessness legislations by introducing a new 'duty to prevent homelessness' on relevant public agencies, as explained in Chapter 6 'Preventing homelessness'. This would require public bodies in contact with people at risk of homelessness to take reasonable steps to help prevent and resolve someone's homelessness.

Tackling rough sleeping in new and improved local authority homelessness strategies

Problem
Local authorities in England, Scotland and Wales are required to publish strategies addressing homelessness in their local area.

The Homelessness Act (2002) requires each local authority in England to publish a homelessness strategy, based on the result of a review, every five years. The strategies were intended to ensure that local authorities were not simply focused on finding people accommodation. The focus was on early intervention to prevent people from becoming homeless or sleeping rough in the first place. However, local authorities can opt out of creating a homelessness strategy under section 6 of *The Local Government Act (2000)*. This Act permits the Secretary of State to dis-apply the requirement to prepare, produce or publish any plan or strategy if they are satisfied that it is not appropriate. This includes the duty to compile a homelessness strategy.

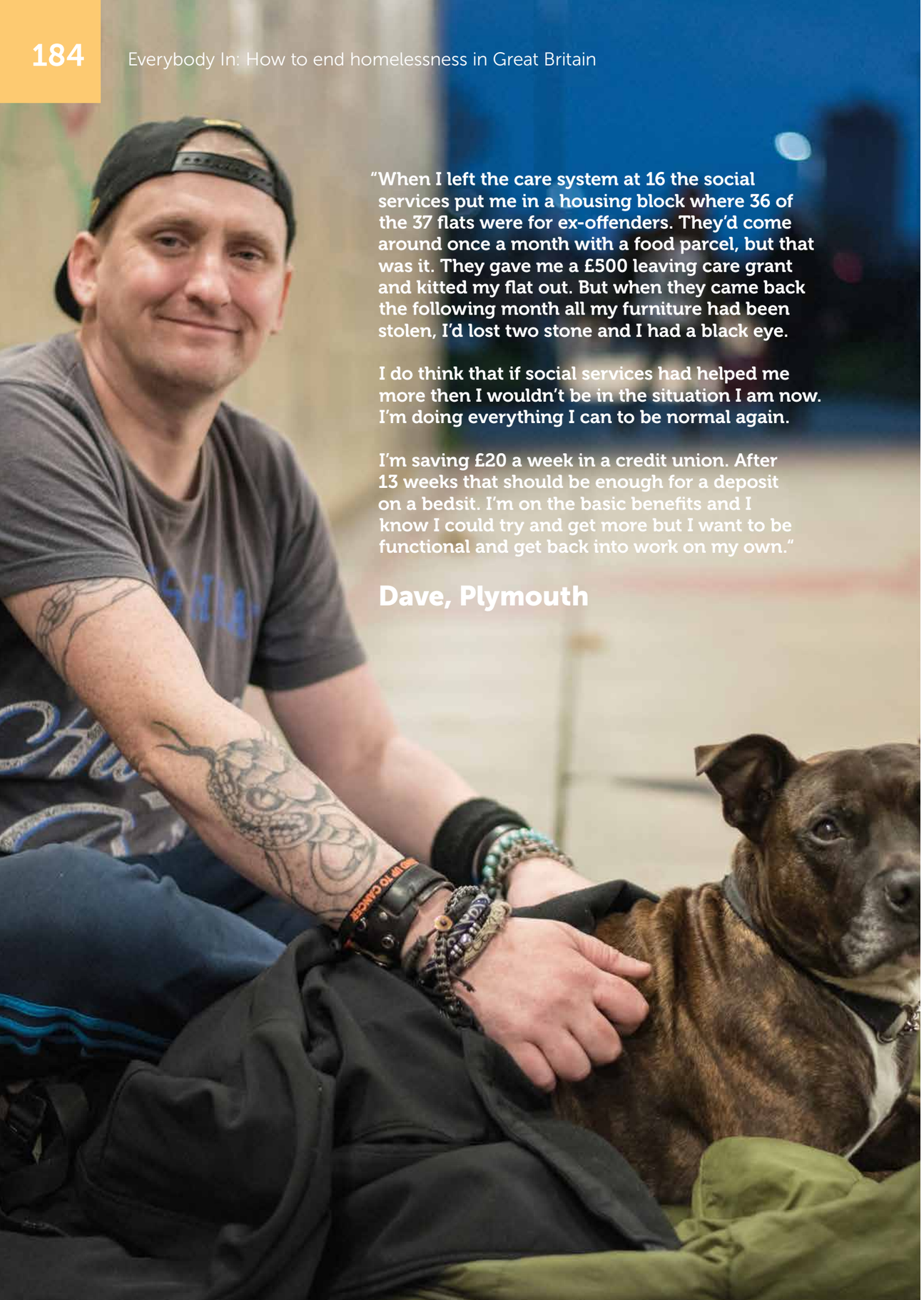
A similar duty to produce a strategy is set out in *The Housing (Scotland) Act (2001)*. Under this Act, Scottish local authorities are expected to prepare and submit strategies for preventing and alleviating homelessness in their area to Scottish Ministers when required. Local authorities however, are only required to publish these strategies every five years.

The Housing (Wales) Act 2014 also contains a duty requiring local authorities to produce a homelessness strategy in 2018. They must then produce a new homelessness strategy every fourth year after this within guidelines provided in the Code of Guidance (2016).

Rough sleeping should always be featured in such strategies where needed. However, the strategies themselves are not required to detail the amount of housing and support required for the actual rough sleeping population.

Solution
A revised approach to homelessness strategies at a local level is required to ensure a housing-led approach to rough sleeping. Strategies should be principally driven by key performance targets for the provision and accessibility of affordable permanent housing stock for people experiencing homelessness and support services. Local homelessness strategies should help inform targets from national government for the provision and accessibility of affordable housing.

114 Uscreates (2018) *The lived experience of homelessness*. London: Crisis and Groundswell



"When I left the care system at 16 the social services put me in a housing block where 36 of the 37 flats were for ex-offenders. They'd come around once a month with a food parcel, but that was it. They gave me a £500 leaving care grant and kitted my flat out. But when they came back the following month all my furniture had been stolen, I'd lost two stone and I had a black eye.

I do think that if social services had helped me more then I wouldn't be in the situation I am now. I'm doing everything I can to be normal again.

I'm saving £20 a week in a credit union. After 13 weeks that should be enough for a deposit on a bedsit. I'm on the basic benefits and I know I could try and get more but I want to be functional and get back into work on my own."

Dave, Plymouth

This precise approach, delivering housing-led solutions for every single rough sleeper, aligned to robust data collection about the problem, has been fundamental to successes in reducing rough sleeping in other countries, and is a key element in Finland's dramatic reduction of homelessness.[115]

Impact
The principal benefit of this recommendation would be to ensure that permanent housing stock is made available for rough sleepers (and other homeless people). Publication of key performance targets by national governments will be an important driver to help deliver the supply needed at pace to reduce rough sleeping.

The increase of rough sleeping across Great Britain, should make this a priority reform for each of the three governments.

Responsibility for change
The Westminster, Welsh and Scottish Governments would be responsible for placing a new duty on local authorities to publish an annually updated homelessness strategy and report on key performance targets.

Collecting better data on rough sleeping

Problem
As detailed at the start of this chapter, there are serious flaws in the data collection and calculation of rough sleeping figures in England, Scotland and Wales. This fundamental problem inhibits attempts to understand and respond to the true scale and nature of rough sleeping.

CHAIN database
The most robust and comprehensive rough sleeper data set in Great Britain is the London CHAIN system funded by the Greater London Authority. The database is able to collect flows of rough sleeping. These flows allow outreach teams and services to know if someone is new to the street, a returner or a long-term rough sleeper. Demographic information is collected, but other data is collected too. This includes details about support needs, reason for homelessness, if they have previously been placed in homelessness services (short and long-term) and prior rough sleeping experience.

While the CHAIN database is the most comprehensive data set on rough sleeping, it has the following drawbacks.

- It does not link to statutory data sets and is only fully accessible to commissioned services in London.
- The data does not always show if someone has approached their local authority for assistance before experiencing rough sleeping.
- Non-commissioned services have limited access to the database leading to criticisms that those who are more hidden or ineligible for services are not recorded.
- While some short and long-term accommodation projects record outcomes on the CHAIN database, this is patchy in its coverage. So, it does not present a complete picture of what happens to rough sleepers in London once they have been moved off the streets.

115 Y Foundation (2017) *A Home of Your Own Housing First and ending homelessness in Finland*. Keuruu: Otava Book Printing Ltd.

Solution
A more robust and comprehensive system for recording rough sleeping is required in England, Scotland and Wales. A data recording system should measure annual flow as well as point-in-time counts. It should also be linked to statutory homelessness data to show the interaction of rough sleepers with prevention and relief services.

To deliver this more robust approach, the following will be required.

- A CHAIN-style database (with improvements as detailed above) expanded to all parts of England. Equivalent systems should be introduced in Wales and Scotland, recording interactions with rough sleepers via outreach teams and other services.
- This should be bolstered by a more robust approach to point-in-time street counts in each nation, with local authorities required to count people rather than estimate numbers.
- As in Scotland, English and Welsh Housing Options teams should record whether people have slept rough before making a homelessness application, and for how long.

8.3 Ending rough sleeping for people already sleeping rough

Scaling up an assertive outreach model

Problem
Assertive outreach is critical to an evidence-based approach to tackling rough sleeping, but the approach is not delivered consistently or at the scale required.

Despite the growing number of people sleeping rough, homelessness charities report a decline in assertive outreach provision since 2009. This is particularly in areas of the country that do not have a large metropolitan centre. In Scotland, sector experts have also acknowledged a lack of an assertive outreach model.[116]

A recent Freedom of Information request from Crisis found that in all areas in England, except the West Midlands, local authority spending on outreach services increased between 2013/14 and 2016/17 (an average of 17%).[117] This is to be expected given that the number of people sleeping rough has increased by almost 100 per cent during the same period.[118] Similarly, during the same period local authority spending on outreach services in Wales increased by 17 per cent as the number of people sleeping rough has increased.[119] Funding in Scotland decreased by five per cent, despite the number of rough sleepers increasing by 10 per cent in the last year.[120]

116 Johnsen, S. (2016) *Enforcement and interventionist responses to rough sleeping and begging: Opportunities, challenges and dilemmas.* York: The University of York.
117 Crisis (2018) *FOI request to all England, Scotland and Wales councils.* Unpublished.
118 The Ministry of Housing, Communities and Local Government (2018) *Rough sleeping in England: autumn 2017.* https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017
119 Welsh Government (2017) *National Rough Sleeper Count.* http://gov.wales/statistics-and-research/national-rough-sleeping-count/?lang=en
120 Scottish Government (2017) Homelessness in Scotland: Annual Publication 2016/17; Littlewood, M., Bramley, G., Fitzpatrick, S., Wood, J., (2017) *Eradicating 'Core Homelessness' in Scotland's Four Largest Cities: Providing an Evidence Base and Guiding a Funding Framework*. Edinburgh: Heriot-Watt University and Social Bite.

In 2016, St Mungo's carried out an investigation into the provision of specialist mental health outreach workers. They found that a significant number of specialist mental health and homelessness teams, established in London under the Homeless Mentally Ill Initiative (HMII), had been disbanded.[121] The HMII was launched in 1990 by the then Department of Health in response to the high numbers of people with mental health problems sleeping rough in London. The funding was used over a three-year period to deliver specialist outreach teams, supported accommodation and move-on housing.

The NSNO approach, widely rolled out across England since 2011, has been praised for moving new rough sleepers off the streets quickly. However, service providers are concerned about its ability to provide a suitable offer to people with higher support needs who have spent longer on the streets.[122] In many parts of the country the NSNO approach constitutes a single service offer. This could be a reconnection offer or placement in temporary or permanent accommodation. If the rough sleeper declines the offer, the service is not required to make them another one. The purpose is to reduce the risk of someone continuing to sleep rough with the expectation of getting a better offer. However, this may not be successful for the most entrenched rough sleepers who need a more personalised and flexible approach.[123]

Solution
The Scottish, Welsh and Westminster Governments should provide local authorities with additional financial support to expand assertive outreach services. The aim is to provide robust and personalised support for rough sleepers, helping them move off the streets as quickly as possible. The Westminster Government has recently launched a new Rough Sleeping Initiative, which will target £30 million of funding for 2018 to 2019 to local authorities with high levels of rough sleeping. This funding will partly be spent providing a more specialist assertive form of outreach work. The Homelessness and Rough Sleeping Action Group in Scotland has also recommended a more assertive form of outreach to tackle rough sleeping.

The primary aim of assertive outreach is to end someone's homelessness, often through moving them into a permanent home of their own. Assertive outreach teams place a greater emphasis on an integrated approach to delivering support. They use a multidisciplinary team, including mental health and drug and alcohol specialist workers. They also ensure rough sleepers have swifter access to legal, benefits and employment support.

Assertive outreach workers should be expected to direct most rough sleepers to the services they need away from the streets. For those people who have been rough sleeping on the streets for longer and have higher levels of needs, assertive outreach will involve giving them support in situ.

Assertive outreach works best when it is flexible and persistent, when the rough sleeper cannot 'fail', and where there is a meaningful offer of housing (including Housing First

121 St Mungo's (2016) *Stop the scandal: an investigation into mental health and rough sleeping.* London: St Mungo's.
122 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
123 Homeless Link (2014) *Adopting the No Second Night Out Standard-Developing a service offer for those new to the streets.* London: Homeless Link.

if necessary). Persistence is vital, and the professional training and reflective practice necessary requires specialist skills. The reality for many rough sleepers is that they will have experienced trauma in a variety of ways, and so a psychologically-informed approach is vital.

Common successful elements of assertive outreach include peer mentoring through the outreach team, specialist mental health assessments, and flexibility to accompany the rough sleeper to accommodation and other venues. The importance of using peer mentoring to help people navigate homelessness and other support services was strongly emphasised by people with lived experience in the national consultation undertaken to inform this plan.[124]

Assertive outreach must not be confused with enforcement, and must avoid authoritarian or coercive approaches. Our research found well-targeted enforcement with genuinely integrated support can be effective at stopping anti-social behaviour and be a catalyst for helping rough sleepers move away from the street. However, if used in the wrong way, and without an offer of settled accommodation and support, it can be detrimental.[125] Enforcement measures alone can displace rough sleepers. This leaves them marginalised and excluded from much-needed support services and potentially pushes them into even more danger.

Impact
In the early 2000s, the RSU adopted an assertive outreach approach (delivered through Contact and Assessment Teams), which proved highly effective. This approach was delivered alongside the expansion of some emergency accommodation. The RSU had marked success, reducing the number of people living on the streets by two thirds.

While extremely successful in the short term, only six per cent of people assisted by the RSU in England went straight from the streets into permanent housing. More than 40 per cent of those helped into accommodation returned to the street.[126] By comparison, the assertive outreach team 'Street to Home' in Brisbane linked rough sleepers with permanent accommodation. Only seven per cent of tenancies broke down, and in most instances these tenancies were then transferred to alternative housing.[127]

The primary purpose of assertive outreach models must be to move people into permanent housing.

Responsibility for change
An integrated assertive outreach package of support for rough sleepers via a multi-disciplinary team will be best achieved by local authority teams sharing budgets and responsibilities, particularly across health and homelessness.

A recent Freedom of Information request conducted by Crisis found that the Homelessness Prevention Grant is the main source of funding for outreach services. Another source is local authority budgets. Of the 118 local authorities in England, Scotland and Wales that returned data regarding outreach service funding, only seven (in England) reported receiving any public health, NHS or Clinical Commissioning Group funding. Only three local authorities reported receiving any funding from adult social care services.

To meet the shortfall in funding for assertive outreach, the relevant parts of government will need to allocate funds. In England, this is the Department of Health and Social Care, the MoJ and the Ministry of Housing, Communities and Local Government (MHCLG). In Scotland, this will involve Scottish Government officials from health and social care, housing and social justice and safer communities. In Wales it will involve the Local Government and Public Services Group and the Health and Social Services Group, working with colleagues in non-devolved agencies.

Providing personal budgets for rough sleepers needing high levels of support

Problem
The 'what works' review highlighted the key role of personalised budgets in delivering a person-centred approach, for longer-term rough sleepers with higher support needs.[128]

A personalised budget is an agreed amount of money allocated to someone by a local authority, or other funding stream. It follows an assessment of the person's care and support needs and is designed to meet agreed outcomes.

There are many positive impacts of this approach beyond housing. These include:

- health improvements and more appropriate access to healthcare
- reductions in substance misuse
- re-establishing positive social networks
- improved self-esteem
- increases in social welfare claims
- improved engagement with other services and agencies.[129]

In 2008, the then Department for Communities and Local Government published its rough sleeping strategy document No One Left Out, which committed to piloting personalised support to long-term rough sleepers. Consequently, in 2009 four pilot projects were funded in London, Nottingham, Northampton, and Exeter and North Devon. The London and Exeter pilots were subsequently extended beyond the pilot period.

In 2011 the Welsh Local Government Association Homelessness Network funded five personal budget pilot projects in Cardiff, Newport, Swansea, Bridgend and Anglesey/Gwynedd.[130]

Evaluations of personalised budgets in London and Wales concluded that they were successful, but could only be replicated and expanded across England and Wales if additional funding was made available. This has not yet happened.

124 Uscreates (2018) *The lived experience of homelessness.* London: Crisis and Groundswell.
125 Sanders, B. and Albanese, F. (2017) *An examination of the scale and impact of enforcement interventions on street homeless people in England and Wales*. London: Crisis; Mackie, P., Johnsen, S., and Wood, J. (2017), *Ending rough sleeping: what works? An international evidence review,* London: Crisis.
126 Mackie,P., Johnsen, S., andWood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
127 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
128 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
129 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
130 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

Solution
A funding mechanism for accessing individual budgets for rough sleepers is required in all three nations. It is sensible to allocate funds proportionately to the areas with highest number of rough sleepers who require this approach. In Scotland, the Homelessness and Rough Sleeping Action Group has recommended that the Scottish Government establish a national personalised budget fund. This can be used by local teams based on reliable data about the nature and number of rough sleepers in their area.

The 'what works' review found that personalised budgets cost £3,000 per person in England and £2,000 per person in Wales.[131] This excluded the costs of delivering the personalised budgets programme via a support worker.

Responsibility for change
National governments, with input from relevant departments should set up a fund for personal budgets and allocate this to local authorities.

Ensuring support for rough sleepers is underpinned by the legislative framework

Problem
Several of the measures outlined above require local authorities to provide a robust and personalised support package to rough sleepers once rehoused. In 2013 the Scottish Government introduced a housing support duty to homeless households. This helps provide statutory backing for such measures, although *The Homelessness Monitor Scotland (2015)* has highlighted the limited impact of the legislation to date.[132] No such provision exists in England and Wales. Support services for homeless people, particularly single people, have largely been provided by third sector organisations working outside the statutory system. This makes them vulnerable to competing agendas, particularly those with statutory backing. This has been the case in England where the ring-fence for the Supporting People funding was removed in 2009. This funding was predominantly used to finance homelessness services for people who do not qualify as statutory homeless. Since 2010, Supporting People funding in England has decreased by 67 per cent.[133] The Welsh Government's decision, to merge Supporting People with a wider series of non-housing grants and remove longer-term certainty about the funding level, presents a similar risk. This decision has provoked widespread concern from the sector.[134]

Solution
All support services and budgetary provision for rough sleepers must be protected by both national governments. This is needed to guarantee the support they need to access and maintain tenancies. It is also needed to protect the budgets for these crucial services, which have proven vulnerable to cuts.

As outlined in Chapter 13 this duty would primarily be placed on local authorities. Furthermore, the Welsh Government should maintain a ring-fence between housing-based grants and non-housing grants and provide certainty of at least two years in setting the level of the housing grant. This is to assist with planning and commissioning the longer-term support needed to help homeless people.

131 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.
132 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Scotland 2015*. London: Crisis.
133 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2017) *The Homelessness Monitor: England 2017*. London: Crisis.
134 National Assembly for Wales Equality, Local Government and Communities Committee (2018) *Life on the streets: preventing and tackling rough sleeping in Wales*. Cardiff: National Assembly for Wales.

Responsibility for change
The Westminster and Welsh Governments.

Investing more in StreetLink to better identify people sleeping rough

Problem
A key problem identified by those working in the homelessness sector is how outreach teams can identify particularly vulnerable groups. These groups are often less visible and might include women and younger rough sleepers.

In 2012, the StreetLink programme was set up in England and Wales to help the public identify rough sleepers and connect them to local services. StreetLink allows people to report that they have seen a rough sleeper via a website, mobile app and phone line. This is a key mechanism by which outreach teams in England and Wales receive information about rough sleepers' locations.

StreetLink is funded by the MHCLG, the Greater London Authority (GLA) and the Welsh Government. It is delivered by Homeless Link in partnership with St Mungo's.

The recent evaluation of StreetLink found that it is being used regularly by a variety of different groups in addition to members of the public for whom it was originally designed. These include: rough sleepers themselves who self-refer; homelessness organisations who refer their clients; other organisations where homeless people might refer (eg food banks), and even local authority Housing Options teams to refer people who present as homeless to them too.[135]

Most members of the public who have used StreetLink in England and Wales view StreetLink positively. They believe it is a quick and easy way for members of the public to connect a rough sleeper with relevant local services. However, the perception of StreetLink among those homeless people who have used it to self-refer in England and Wales is less positive.

Solution
The MHCLG, GLA and the Welsh Government should increase investment in StreetLink across England and Wales to help expand the public's role in identifying rough sleepers.

Using the evaluation findings, we recommend the following to further promote the use and understanding of StreetLink. This will ensure there is sufficient resource to set up a separate helpline for homeless people and those working with this group.

- Separate StreetLink as a tool for members of the public only and develop an additional phone line (or lines) with additional funding, allowing for homelessness professionals and homeless people to self-refer.

- Increase budget and capacity for local and national level awareness raising campaigns to promote StreetLink. Budget should also be increased to cope with the additional demand for StreetLink the campaigns will generate.

The StreetLink service does not currently operate in Scotland. We recommend that, using the evidence in England and Wales, the Scottish Government undertake an evaluation to explore whether it would be a useful mechanism to help identity and reduce the number of people sleeping rough.

135 Moisl, E., Albanese, F., Sanders, B., Leith, G., Rahman, L. and Sutton-Hamilton, C. (2018) *Evaluation of the StreetLink project*. London: Crisis.

"I was a single parent to three kids trying to get away from an abusive relationship and I was struggling with grief after my sister died. I just needed a wee bit of help and support to put things right, but instead of helping me they decided to take the kids away which made everything so much worse.

The drugs are just a comfort. It's like a routine. Just a big circle that never ends... I've been on a script and I've had a few temporary rooms and hostels but nothing that lasted... it's getting harder and harder to live with.

It's not that I want to give up.
Just give up on the system."

MJ, Edinburgh

Impact
Greater investment in the StreetLink services, which would lead to an increased number of rough sleepers identified by the public, must therefore be accompanied by greater investment in street outreach teams. More detail on the expansion of outreach services is outlined elsewhere in this chapter.

Responsibility for change
The Westminster, Welsh and Scottish Governments.

Getting people off the streets quickly and into permanent accommodation

Problem
While the shift to a housing-led, rapid rehousing approach is a key element of this plan to end homelessness, we should never allow the provision of good quality emergency accommodation to be withdrawn. Over time, it is reasonable to suggest that hostels and other emergency accommodation will be scaled back. However, there will always be a need for short-term and high-quality emergency provision.

Some supported housing schemes, especially those with high levels of wear and tear such as hostels, can have considerably higher costs than mainstream accommodation in social or private rented sectors. The introduction of Universal Credit means that these higher costs would need to be managed within a centralised system.

The design of Universal Credit also makes it too inflexible to respond to short stays in supported accommodation. As a result, during 2017/2018 the Westminster Government is undertaking a Great Britain-wide consultation about the future funding of supported housing.

At the time of writing, proposed changes to funding for short-term supported housing will transfer the rents and eligible service charges into a ring-fenced pot. This will be administered by local authorities and will include very short-term emergency accommodation, and all supported housing with an intended stay of less than two years' duration.

Crisis is concerned that this will reduce funding available over the long term, should the ring-fence be lost in future. It will also reduce the ability of providers to raise finance to invest in improving or maintaining the quality of existing services, or building new supply. There are concerns that good quality short-term accommodation for homeless people could be lost and as a result initiatives to end rough sleeping undermined.[136]

Solution
Rather than introduce major changes to the funding of short term supported housing, the Westminster Government should ensure the design of the Universal Credit system is flexible and responsive enough to meet the needs of people in supported housing and fully take account of supported housing costs.

Any future consideration of funding for supported housing should be undertaken as part of a housing and homelessness focused strategic review. Once the Westminster, Scottish and Welsh Governments have consulted upon and agreed future plans for tackling homelessness, their funding strategies should reflect these.

136 Homeless Link (2017) *'New plans for supported housing'*, https://www.homeless.org.uk/connect/news/2017/nov/01/new-plans-for-funding-supported-housing; St Mungo's (2018) *'Save hostels, rebuild lives'*, https://www.mungos.org/get-involved/campaign-for-change/save-hostels-rebuild-lives/

Impact
This should see less demand and need for short-term supported housing. Better prevention services and housing-led approaches result in people receiving the support they need in mainstream accommodation.

Responsibility for change
Homelessness and housing policy are devolved matters – but welfare is a UK-wide led policy.

The Westminster Government should take responsibility for ensuring Universal Credit is compatible with the short-term supported housing sector and fully meets the associated housing costs. This will ensure people needing short-term supported housing are not discriminated against through reliance on local councils covering their housing costs. They should be able to pay their rents in the same way as other citizens. This should happen immediately.

Each government should adopt a plan to move towards a housing-led approach to preventing and tackling homelessness. The Scottish, Welsh and Westminster Governments should work together to develop the funding systems needed to support the delivery of strategic, integrated and holistic housing-led services to ensure homelessness is rare, brief and non-recurrent.

Introducing national reconnection frameworks

Problem
Outreach teams often try to reconnect a rough sleeper back to the local authority area where they had their last settled base so they can re-establish a local connection. This policy expanded rapidly in England after the introduction of NSNO. It should be noted that this policy is far more common in England and Wales. In Scotland, housing support for rough sleepers is provided through the statutory local connection framework.

When done poorly, reconnections can be detrimental to rough sleepers. The area where the person has the connection may not be appropriate to them anymore. There might not be a support network or they may be threatened with violence if they return.

A 2015 Crisis-commissioned report found while the policy of reconnecting rough sleepers is widely used, outcomes are often not monitored.[137] Too often people are reconnected to somewhere they have no meaningful connections or support services in place. The limited data available suggests that reconnection experiences and outcomes vary dramatically. They can be positive where someone is found accommodation with the support they need. Or they can be negative – where someone may have to sleep rough in the connection area because the services offered are poor or time limited.

Evidence from the 'what works' review, found that reconnections are much more likely to be successful for people who are new to the streets. This is because they might still have a live connection in the area. Reconnection is also successful where the connecting authority ensures there is meaningful support on offer at the destination before the person travels there.[138]

Solution
Governments in each nation should introduce a national reconnections framework.

137 Johnsen, S. and Jones, A. (2015) *The reconnection of rough sleepers within the UK: an evaluation.* London: Crisis.

138 Mackie, P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

Reconnections should only be explored when rough sleepers have a meaningful connection to an area. This means prior use of services and/or the presence of positive social support networks. Ultimately, the decision should be based on individual choice. A reconnection should not be explored if there are grounds to believe that returning to the area where they were last settled will put someone at risk of violence or harm. This should be regardless of whether there are police records to prove this.

Standards should be applied to the reconnection approach via the establishment of national reconnection frameworks in each nation. These national standards should outline the minimum level of support rough sleepers should receive from the host and recipient local authority, and from other third sector agencies. They should also include a description of when it is and is not appropriate to reconnect a rough sleeper.[139]

National reconnections frameworks should also require local authorities to collect and publish data on the reconnections they make and receive. Long-term outcomes for people relating to sustaining settled accommodation and their health and wellbeing should be included.

Impact
The production of a national reconnections framework and collection of and publication of data on reconnections could be achieved relatively quickly without legislative change. Local authorities would require some additional funding to help collect more data on reconnections.

Responsibility for change
National governments in England, Scotland and Wales.

Scrap local connection criteria for rough sleepers

Problem
Rough sleeping is dangerous, and every effort should be made to find immediate accommodation to prevent and stop it happening. Where people have to prove a local connection to an area this can stand in the way of rough sleepers accessing statutory homelessness services.

In England and Wales, the requirement to demonstrate local connection can also limit access to the non-statutory services such as emergency accommodation and day centres. And even if they are in the area to which they have a local connection, some rough sleepers will simply not have the paperwork to prove it.

Solution
Until local connection is more widely reformed, so it no longer presents a barrier to assistance for anyone at risk of homelessness, it should be scrapped for rough sleepers.

To get immediate help to access accommodation with the necessary support, rough sleepers should not face an arbitrary test to prove local connection, and so this rule must be scrapped. This does not, however, rule out responsible reconnections, where a rough sleeper will choose to return to a place with better support.

In Scotland, local connection is currently applied to accessing settled accommodation, but the power to suspend local connection altogether has already been created and should now be put into effect. This has also been a key recommendation of the Homelessness and Rough Sleeping Action Group in Scotland. Chapter 13 sets out the case for reform of local connection across Great Britain in more detail.

139 This should include details of how to assess security of accommodation at the destination, protocols for escorting people safely, and periodic checks between authorities regarding the outcomes of people who have been reconnected.

Impact
This change would significantly improve entitlements for rough sleepers providing local authorities have the resources needed to accommodate and support people. Certain 'hotspot' local authorities will be disadvantaged by this change.

Westminster is an example of a London borough that has a rough sleeping population largely made up of people from outside. Proportionate funding will therefore be needed in such areas, ideally through a system where funding support follows the individual rough sleeper.

In theory, this policy would be cost neutral. Although before implementation, national governments should investigate whether it is more likely that services will be accessed in local authorities with higher running costs. This could result in a higher than average bill for some 'home' or 'last settled base' authorities whose services are significantly lower to run than Westminster's for example.

Responsibility for change
The Westminster, Welsh and Scottish Governments.

Scrap *The Vagrancy Act (1824)*

Problem
The Vagrancy Act (1824) is pre-Victorian era piece of law that is still used to criminalise people who are rough sleeping in England and Wales. This is unacceptable and not just because the punitive values of this approach are out-dated. There is also good evidence showing that enforcement approaches are not an effective way to either engage rough sleepers, or to resolve their problems.[140]

The growth of enforcement measures against rough sleepers in recent years been met with significant opposition from the public.[141] Our recent research in England and Wales found well-targeted enforcement, with genuine offers of accommodation and support, can act as a catalyst for helping rough sleepers away from the streets.

However, if used in isolation this approach can merely displace rough sleepers, leaving them further marginalised and excluded from the help they need.[142] Prosecuting people for the 'crime' of rough sleeping is far beyond the evidence of what will effectively assist people.

While the use of informal enforcement measures is much more common,[143] evidence shows that *The Vagrancy Act (1824)* is still used to clear rough sleepers from the streets. The Act gives the police in England and Wales the power to issue a formal arrest if someone has been offered shelter and continues to sleep on the street. It not only targets behaviour potentially linked to rough sleeping, but the very act of rough sleeping itself. Begging and persistent begging are also prohibited through the Act. A recent Freedom of Information request found that the number of prosecutions under section 3 of *The Vagrancy Act (1824)* increased from 1,510 in 2006/07 to 2,365 in 2015/16 in England.[144]

Solution
Criminalising rough sleepers does nothing to help resolve and tackle the causes of homelessness. It is far more likely to prevent someone from accessing vital services that support them to move away from the streets.

We recommend that the Westminster Government repeal *The Vagrancy Act (1824).*

Impact
Repealing the Act would mean that rough sleeping alone could not warrant criminal prosecution. This would improve the chances of rough sleepers rebuilding their lives once they move off the streets.

Furthermore, repealing the Act would have a significant impact in helping to more positively shape the attitudes of enforcement agencies and the police. This should ensure that where other enforcement measures are used, there is a greater awareness about the need to provide support in parallel with helping someone end their homelessness.

There would be no significant cost implications.

It should be noted that anti-social behavioural problems linked to rough sleeping and begging could still be enforced against using newer pieces of legislation. For example, *The Anti-social Behaviour, Crime and Policing Act (2014)* provides the police with a range of options to take enforcement action against individuals or groups causing, or likely to cause, anti-social behaviour in public places or common areas of private land. *The Vagrancy Act (1824)* can also be used to enforce against indecent exposure. This offence however, can now be enforced against under *The Sexual Offences Act (2003).*

Responsibility for change
The Westminster Government.

Ensuring support for migrant rough sleepers

Problem
Migrant rough sleepers face all the dangers that people from the UK face. They also must contend with additional suspicion about their motives and are excluded from almost all support services. The specific dangers for migrants who are homeless and additional challenges they face in getting support are outlined in greater detail in Chapter 12, 'Ending migrant homelessness'.

Migrant homeless people continue to make up a significant proportion of people sleeping rough. In 2016/17, 39 per cent of people seen sleeping rough in London were European Economic Area (EEA) nationals, a total of 3,038 people. This is a decrease compared to the previous two years, from 46 per cent in 2015/16 (3,669 people) to 45 per cent in 2014/15 (3,359 people).[145]

Similar statistics are not available for Wales and Scotland. However, evidence from Scotland shows that a significant proportion of shelter users in the winter of 2016/17 in Edinburgh (28%) and Glasgow (21%) are from non-UK backgrounds. Twenty five per cent were from EU backgrounds

140 Sanders, B. and Albanese, F. (2017) *An examination of the scale and impact of enforcement interventions on street homeless people in England and Wales*. London: Crisis; Mackie, P., Johnsen, S., and Wood, J. (2017), *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
141 BBC Online (2018) '*Royal wedding: Windsor rough sleeping plans 'withdrawn''*, 14th February: http://www.bbc.co.uk/news/uk-england-berkshire-43060022 ; The Guardian Online (2015) '*Hackney council in east London drops threat to fine rough sleepers'*, 5th June: https://www.theguardian.com/uk-news/2015/jun/05/hackney-council-drops-threat-to-fine-rough-sleepers.jun/05/hackney-council-drops-threat-to-fine-rough-sleepers.
142 Sanders, B. and Albanese, F. (2017) *An examination of the scale and impact of enforcement interventions on street homeless people in England and Wales*. London: Crisis; Mackie, P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
143 Sanders, B. and Albanese, F. (2017) *An examination of the scale and impact of enforcement interventions on street homeless people in England and Wales*. London: Crisis; Mackie, P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
144 FOI request (2016) 'The 1824 Vagrancy Act defined people of various types and behaviours to be 'incorrigible rogues and vagabonds', a crime punishable by law. Can you tell me how many people were prosecuted, and of those how many found guilty, of crimes under the 1824 Act on each of the last 10 years?'. https://www.whatdotheyknow.com/request/being_an_incorrigible_rogue
145 Greater London Authority (GLA) (2017) *Chain Annual Report 2016/17.* London: GLA.

in Edinburgh, compared to 11 per cent in Glasgow).[146]

In 2017, the rough sleeping count for England showed a six per cent increase in the number of non-UK rough sleepers from EU countries, from 714 in 2016 to 760 in 2017.[147]

Solution
The solutions to homelessness for migrants are essentially the same as for any other people experiencing the problem. As a service provider, we do not withhold or deny elements of our help to homeless people based on their nationality or immigration status.

Our experience is that migrant homeless people have the same goals as UK nationals. They want to find stable housing as soon as possible and have a strong motivation to gain employment if they don't already have it. The ideal approach to solving migrant homelessness (including rough sleeping) would be to disregard the migrant status, and provide entitlements to people in the same way as UK nationals.

There are specific recommendations that would help reduce the number of migrants sleeping rough by ensuring that they have access to appropriate support services.

- Increased assertive outreach services with access to legal, benefit and employment support and linked with immigration and legal advice services should be provided for EEA nationals sleeping rough. This will be key in finding a long-term solution to a person's homelessness because their homelessness may be caused by difficulty establishing and proving their status in the UK.

- The model used by the Street Legal project could be extended or replicated to provide outreach and immigration advice for rough sleeping EEA nationals. Street Legal provides access to immigration advice and where possible accommodation, for homeless migrants in London who have unresolved immigration status and are from outside the EEA.[148] A similar service has been piloted in Edinburgh through the StrEEt Aware project. This has provided free, confidential legal advice to EEA nationals who are rough sleeping or at risk of rough sleeping.[149]

- Assertive outreach for rough sleeping migrants from outside the EEA, who do not have recourse to public funds, must provide both emergency accommodation and access to immigration advice. Governments should provide short-term emergency accommodation for destitute migrants who are currently rough sleeping, or at high and imminent risk of doing so.

146 Bethany Christian Trust (2017) *Care Shelter Annual Report 2016/17.* Glasgow City Mission (2017) Glasgow Winter night Shelter data tables 2016/17. https://www.glasgowcitymission.com/admin/resources/gwns2016-17datatables.pdf

147 MHCLG *Rough sleeping statistics England autumn 2016*: table 2. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2016; MHCLG *Rough sleeping statistics England autumn 2017*: table 2b. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017#history

148 Homeless Link (2016) *How innovative legal help is supporting destitute migrants*, https://www.homeless.org.uk/connect/features/2016/nov/02/how-innovative-legal-help-is-supporting-destitute-migrants

149 Just Right Scotland, *StrEEt Aware Project*, http://justrightscotland.org.uk/our-projects/street-aware-project/

Ensure that safeguarding reviews take place where a person has died while homeless and living on the streets

Problem
In most cases, when someone dies while homeless and living on the streets, their death goes ignored. There is currently no requirement for a review to take place when someone dies simply because they are sleeping rough. Sometimes, if there is a safeguarding concern in relation to the death, the case may be referred to the local Safeguarding Adults Board (SAB) in England and their equivalents in Scotland and Wales. If it is decided that there is a possibility that abuse or neglect contributed to someone's death then they might decide to carry out a review under the relevant legislation.

The purpose of these reviews are for all local agencies to identify the lessons that can be learned from serious safeguarding cases. When carried out, these reviews into deaths of people sleeping rough have been highly illuminating and effective. A combination of confusion over the meaning of abuse and neglect, budgetary pressures, unclear referral processes between agencies and safeguarding boards (adult support and protection committees in Scotland), and a reluctance to refer cases, mean that only a small number of the cases of people who die while sleeping rough goes for a review.[150]

A recent investigation from the Bureau of Investigative Journalism found that there is no centralised record of when and how people die homeless in the UK.[151] The average age of death for someone sleeping rough is only 44 years old. In London alone, around 10-25 rough sleepers die each year.[152] The Bureau of Investigative Journalism investigation found that at least 59 men and 16 women, died while homeless between October 2017 and April 2018.[153] These people have often suffered extensive abuse and neglect, with around a quarter experiencing violent deaths. Failure to carry out a review means that opportunities are lost to tackle the key causes and improve multiagency working to prevent future deaths.

The relevant legislation in all three nations define abuse and neglect in terms that could apply to the vast majority of people sleeping rough. In practice, however, there are very few instances where the death of someone sleeping rough triggers a safeguarding or significant case review.

Solution
The governments in each nation should amend legislation to create a new legal requirement for cases where a person has died whilst homeless and living on the streets automatically to trigger a safeguarding review. National governments should provide local authorities with sufficient funding to carry out the additional reviews. Furthermore, each nation should ensure that there is a centralised

150 In London, Safeguarding Adult Reviews into the deaths of 30 individuals were carried out between 2015-2017, of which 1 individual lived in 'temporary accommodation' (5 individuals were 'not specified'). This is significantly lower than the number of rough sleeper deaths in London. S. Braye and M. Preston-Shoot (2017) *Learning from SARs*.

151 The Bureau of Investigative Journalism, *'Every week this winter two people died rough sleeping'*, https://www.thebureauinvestigates.com/stories/2018-04-23/every-week-this-winter-two-Verpeople-died-sleeping-rough

152 Greater London Authority (GLA) (2016) *Chain Annual Report 2015/16*. London: GLA; Greater London Authority (GLA) (2018) Chain Annual Report 2017/18, London: GLA.

153 The Bureau of Investigative Journalism, *'Every week this winter two people died rough sleeping'*, https://www.thebureauinvestigates.com/stories/2018-04-23/every-week-this-winter-two-people-died-sleeping-rough

record kept of the number of people dying homeless every year.

Impact
This would ensure that all deaths of people sleeping rough are investigated fully and provide more information for local authorities to tackle the key drivers leading to someone's death. It would also create a bank of data with transparency and accountability over when reviews are carried out.

Responsibility for change
The Westminster, Welsh and Scottish Governments.

8.4 Ensuring the right support is in place to stop people returning to the streets

Problem
Housing First is a proven approach to ending homelessness for people with complex needs. It is vital to ensuring that people with the highest levels of needs get the right support to stop them ever returning to the streets. However, it is yet to take hold as a standard approach in Great Britain.

There are at least 18,400 homeless people with complex and multiple needs across Great Britain who can and should benefit from Housing First.[154] But only a tiny proportion of this group can access this provision.

Solution
Chapter 9 'The Role of Housing First in ending homelessness', details the steps necessary in England, Scotland and Wales to use and expand Housing First to its full potential. These steps involve the following.

- **A national director for Housing First in each nation** – Directors should provide strategic oversight ensuring the successful delivery of Housing First across different regions. They will ensure the overall programme is successful in its fidelity to the core Housing First principles[155] regarding housing targets, evaluation etc. This approach has recently been adopted in Ireland, as part of the 'Rebuilding Ireland' strategy.[156]

- **National and local targets for delivering Housing First projects** – Overall targets for the delivery of Housing First should be set and monitored by a national director, then fall to local authorities to fulfil and align with local strategies. These strategies will identify the housing and support targets for rough sleepers and other homeless groups. Targets for providing affordable and accessible homes for people sleeping rough should be driven by rough sleeper counts.

- **Housing supply for Housing First tenancies** – To fulfil the additional housing requirements for extending Housing First (and other housing-led approaches), new and bold measures are required to acquire more social housing and private rented sector accommodation. Any target for numbers of homeless people accessing Housing First must bring with it a corresponding target for housing units.

  Expanding Housing First in Finland, has virtually eradicated rough sleeping. Its success was based on accessing new housing stock and setting targets for local areas to do so, and led to the decommissioning of hostels and night shelters.[157]

154 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales*. Imogen Blood Associates. London: Crisis and Homeless Link
155 For more information of the core principle of Housing First see Chapter 12.
156 Government of Ireland, *Rebuilding Ireland Strategy*, http://rebuildingireland.ie/
157 Y Foundation (2017) *A Home of Your Own Housing First and ending homelessness in Finland*. Keuruu: Otava Book Printing Ltd.

Chapter 11 'Housing solutions' sets out a range of solutions that national governments should implement to increase the supply of affordable and accessible housing. Implementing these solutions will significantly increase the housing options available for homeless people.

It will, however, be necessary to ring-fence housing units specifically for use in Housing First projects. This is to ensure sufficient access to properties as quickly as rough sleepers and others can be offered them. It is also to ensure a dispersed stock of housing across different cities, and local areas.

- **Collect and publish data on the fidelity and outcomes of Housing First projects** – A shared outcomes and fidelity framework for the three nations is critical. The framework will provide a consistent way of collecting and sharing information and measuring success. Outcomes should relate to housing sustainment rates, health and wellbeing and reductions in criminal activity and anti-social behaviour. It should be noted that a framework will also be needed to collect information on the adherence to the principles of Housing First. Rigid outcome-only measures rarely account for the 'distance travelled' by an individual. This can often lead to the 'parking' of people who require greater and more specialist levels of support.

- **Statutory provision of housing and support**
  In England and Wales, housing and support services for single homeless people have largely been offered outside the statutory system. While both England and Wales have introduced prevention and relief duties that apply regardless of household type, there is still no duty on local authorities to provide people with settled housing. This is even if they have very high and complex needs. Similarly, unlike other forms of social care support provided by local authorities, there has been no statutory protection for the support services provided to single homeless people. It is essential that statutory protections are provided for both housing and support for the Housing First model to remain true to its principles.

This will require the following.

A statutory duty to provide housing
As set out in Chapter 13, where reasonable steps to prevent or alleviate homelessness are unsuccessful access to long-term rehousing must extend across all household types. This means that the priority need criterion must be abolished in England and Wales. Scotland has already abolished priority need. Scrapping priority need would be an important step to ensuring a statutory guarantee of settled housing for people who are made a Housing First offer.

A statutory duty to provide support to people who have experienced homelessness – In addition to abolishing priority need, the support element of Housing First must also be protected as part of the statutory system. This is through a new 'duty to support', applicable via legislation in England and Wales. Scotland already applies such a duty.
In addition to these broad reforms, Chapter 9 also details some smaller and more technical recommendations necessary for the successful implementation of Housing First.

Impact
Housing First should primarily be targeted at people who have complex needs. When applied properly it can be expected to sustainably end the homelessness of at least 80 per cent of participants. It can also improve a range of other outcomes such as health and wellbeing.

The overall estimates of those who can and should benefit from Housing First, including rough sleepers and other homeless people with complex and multiple needs are in Table 8.5.[158]

158 For a full explanation of the methodology and calculations, see Chapter 10 'Making Welfare Work'
160 This is a simple one third of the core homelessness estimate of rough sleeping (including those living in cars, tents and public transport) in England, Scotland and Wales.

Table 8.5: Housing First cohorts

	England	Scotland	Wales	GB total
Total Housing First cohort	16,434	1,356	586	**18,376**
Rough sleeping cohort[160]	5,280	462	200	**5,942**

Source: Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales.*

8.5 Tackling the broader issues that drive rough sleeping

In addition to the measures set out in this chapter, the reforms recommended in other parts of the report are also relevant and necessary in tackling rough sleeping. The most important follow below.

- Boosting the supply and accessibility of affordable housing. See Chapter 11.
- Ensuring that the welfare system acts as an effective safety net for people at risk of homelessness, and does not increase the chances of people becoming homeless. See Chapter 10 'Making Welfare Work'.
- Ensuring that the private rented sector is a more suitable tenure for people at risk of homelessness and those that have already experienced it. This includes improvements in affordability, conditions and security. See Chapter 11.
- Extending the statutory prevention system to Scotland. See Chapter 13.
- Extending prevention duties to non-local authority agencies. See Chapter 13.
- Establishing a robust and effective regulator of statutory homelessness services in each nation. See Chapter 13.

8.6 Conclusion

The recent rise in rough sleeping across Britain has alarmed politicians and the public alike. It is right that the problem raises immediate concerns, given the danger faced by every person living on the streets.

The evidence of how to prevent and tackle rough sleeping is relatively strong compared to other forms of homelessness. This is because there are a number of countries and localities that have made good progress. The important lesson of recent years is that housing-led solutions are a more effective approach than offering or requiring people to move from the streets to emergency accommodation.

The reductions in rough sleeping during the late 1990s and early 2000s are a reminder that targeted action, backed by political commitments can make a real difference. The test of the political attention now ascribed to the problem will be whether action is taken to prevent and permanently end rough sleeping.

8.7 Summary of recommendations

	England/Westminster	Scotland	Wales
Preventing rough sleeping	• Introduce a duty to provide immediate emergency accommodation to all those with nowhere safe to stay until priority need is abolished • Provide additional funding to local authorities to scale up the No First Night Out approach to prevent people rough sleeping • Commission and expand Critical Time Intervention to prevent people rough sleeping after leaving state institutions • Introduce a new duty for local authorities to conduct an annual review of their homelessness strategy. The strategy must contain key performance targets for delivering new affordable permanent housing, and support tied to reliable rough sleeping data • Establish a CHAIN-like database nationwide	• Commission and expand Critical Time Intervention to prevent people rough sleeping after leaving state institutions. • Introduce a new duty for local authorities to conduct an annual review of their homelessness strategy. The strategy must contain key performance targets for delivering new affordable permanent housing and support, tied to reliable rough sleeping data • Establish a CHAIN-like database nationwide • Establish a robust annual count of rough sleepers	• Introduce a duty to provide immediate emergency accommodation to all those with nowhere safe to stay until priority need is abolished in Wales • Provide additional funding for local authorities to introduce the No First Night Out approach to prevent people rough sleeping • Commission and expand Critical Time Intervention to prevent people rough sleeping after leaving state institutions • Introduce a new duty for local authorities to conduct an annual review of their homelessness strategy. The strategy must contain key performance targets for delivering new affordable permanent housing and support, tied to reliable rough sleeping data • Establish a CHAIN-like database nationwide
Ending rough sleeping for those experiencing it	• Increase funding to scale up an assertive outreach model • Provide personal budgets for rough sleepers requiring high levels of support • Protect support budgets through a new duty to support homeless people • Increase investment in StreetLink and use learnings from its recent evaluation to promote better use of the service • Protect the long-term funding mechanism for emergency accommodation and ensure that the Universal Credit system is flexible and responsive enough to meet the needs of people living in supported housing • Introduce a national reconnections framework and collect and publish data on long-term outcomes for rough sleepers that are reconnected within England • Scrap local connection rules for rough sleepers and ensure that it no longer presents a barrier to anyone at risk of, or experiencing, homelessness. • Scrap *The Vagrancy Act (1824)* • Ensure that short-term emergency accommodation is provided for migrants who are homeless, or at imminent risk of becoming homeless, alongside access to immigration advice • Ensure that safeguarding reviews take place where a person has died while homeless and living on the streets	• Increase funding to scale up an assertive outreach model • Provide personal budgets for rough sleepers requiring high levels of support • Consider whether to extend the StreetLink service to Scotland • Scrap local connection rules for rough sleepers and ensure that it no longer presents a barrier to anyone at risk of, or experiencing, homelessness • Introduce a national reconnections framework and collect and publish data on long term outcomes for rough sleepers that are reconnected across Scotland • Ensure that short-term emergency accommodation is provided for migrants who are homeless, or at imminent risk of becoming homeless, alongside access to immigration advice • Ensure that safeguarding reviews take place where a person has died while homeless and living on the streets	• Increase funding to scale up an assertive outreach model • Provide personal budgets for rough sleepers requiring high levels of support • Protect support budgets through a new duty to support homeless people • Ring-fence the Supporting People fund and guarantee funding beyond the current one-year budget allocation • Increase investment in StreetLink and use learnings from its recent evaluation to promote better use of the service • Introduce a national reconnections framework and collect and publish data on long term outcomes for rough sleepers that are reconnected across Wales • Scrap local connection rules for rough sleepers and ensure that it no longer presents a barrier to anyone at risk of, or experiencing, homelessness • Ensure that short-term emergency accommodation is provided for migrants who are homeless, or at imminent risk of becoming homeless, alongside access to immigration advice • Ensure that safeguarding reviews take place where a person has died while homeless and living on the streets

	England/Westminster	Scotland	Wales
Ensuring people do not return to the streets (see Chapter 9 'The Role of Housing First in ending homelessness', for more detail)	• Establish a national Housing First infrastructure, including: – A national director within government, monitoring delivery, fidelity, etc – National and local targets for Housing First provision – Housing stock and support targets within revised local strategies	• Establish a national Housing First infrastructure, including: – a national director within government, monitoring delivery, fidelity, etc – national and local targets for Housing First provision – housing stock and support targets within revised local strategies	• Establish a national Housing First infrastructure, including: – a national director within government, monitoring delivery, fidelity, etc – national and local targets for Housing First provision – housing stock and support targets within revised local strategies

"My drug use led to prison. Prison led to harder drugs. Then people involved with drugs led me to be unable to stay in the place that I had... My mental health started to suffer to the point where I had to see a psychiatrist.

Drugs lead to behaviours you wouldn't contemplate in your right mind, and that leads to worse consequences like homelessness. I always tried to find a friend to stay with, but I've slept rough, I've slept in night shelters and I've been in the big hostels...

Housing First was just very fortunate for me. I had a new psychiatrist... she was aghast when she heard my story... She actually called me to give me advice about the Turning Point Crisis centre. I stayed there for a month, then I spent ten months in rehab, followed by nine months in a moving-on centre...

I was interviewed [for Housing First] six to eight times... they wanted to know more about me... but they explained it would be a permanent flat with certain housing associations for people with a history like mine...

I got my flat with them in 2014. Knowing I've got a secure tenancy on my own place which I don't have to share with strangers... I live in a normal community away from old influences. I have my own keys and I manage my own home. I know I could still get evicted, but having that responsibility has always made me not do anything to risk that... I'm able to get on with my neighbours, I have food and electricity. That makes me feel quite blessed now.

At the start the support workers come and visit you twice a week, and often it's just for a chat and a catch up, but they also help me keep connected with all the other services, like mental health and drug rehab.

They remind me about appointments and often come with me to attend them. It's been so positive for all areas of my life. From managing my home and encouraging me to keep in contact with my family, to just making sure I'm eating properly. It's great... I don't know where I would be without Housing First now. In prison probably..."

Eric, Glasgow

Chapter 9:

The role of Housing First in ending homelessness

Housing First can reduce homelessness across Great Britain for people in the greatest need.

It is the cornerstone of several successful national homelessness strategies worldwide. This chapter outlines how, building on existing strong political commitments, Housing First can be developed and rolled out across England, Scotland and Wales.

9.1 Introduction

Housing First is the most important innovation in tackling homelessness of the last few decades. It is proven to end homelessness for around 80 per cent of people with high support needs.[1]

The Housing First model prioritises getting people quickly into stable homes. From this point, any other support needs they might have – such as alcohol and drug dependency, physical and/or mental health problems – are addressed through coordinated and intensive support.

Central to the concept of Housing First is that permanent housing is provided without a test of having to be 'housing ready'. Furthermore, maintaining the

1 Housing First Europe Hub, http://housingfirsteurope.eu/guide/what-is-housing-first/introducing-housing-first/

tenancy is not dependent on the tenant using support services.

Housing First is built upon the principle that housing is a human right. It focuses on first giving someone immediate access to a settled and secure home. This is placed above goals such as sobriety or abstinence.[2] The model is specifically tailored for homeless people with complex and multiple needs. It is designed to provide choice and control – it gives rights and responsibilities back to people who may have been repeatedly excluded.

The success of the model depends on wider reforms. These clearly involve people having access to stable and affordable housing. But it also depends on offering them a wide range of services which can offer timely personalised support and in the format they choose.[3]

This chapter sets out the evidence of international and British Housing First successes. It also features results of a new study by Imogen Blood and Associates. This looked at the requirements for implementing Housing First at scale across England, Scotland and Wales.

The study estimates the numbers of people who can and should be offered this solution to their homelessness. There are at least 18,376 homeless people with complex and multiple needs across Great Britain who can and should benefit from Housing First.[4]

9.2 The opportunity for change

Lessons from abroad

Overwhelming evidence highlights the effectiveness of Housing First. This evidence shows how it helps people with complex needs sustain permanent accommodation and also supports them to resolve or improve the other non-housing problems they face. The volume of evidence far exceeds that of any other intervention.[5] It includes a mix of large-scale Randomised Control Trials (RCTs) and smaller studies.

Housing First has particularly high housing retention rates, ranging between 60-90 per cent – typically around 80 per cent.[6] Strong evidence shows how it helps resolve or improves non-housing issues, particularly regarding reductions in offending and improved mental health.[7] Housing First has not been shown to produce the same results regarding physical health, though there is no reason to suggest these outcomes are any worse than in traditional approaches.[8]

2 Mackie,P., Johnsen, S., & Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
3 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales*. Imogen Blood and Associates. London: Crisis and Homeless Link.
4 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales*. Imogen Blood Associates. London: Crisis and Homeless Link.
5 Mackie,P., Johnsen, S., & Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
6 Mackie,P., Johnsen, S., & Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
7 Mackie,P., Johnsen, S., & Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
8 Mackie,P., Johnsen, S., & Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

Housing First was developed in the US by the organisation Pathways to Housing, and is now being delivered across the world. Perhaps the most striking example of its success is in Finland, where Housing First is part of a wider strategy to end homelessness. Here, it has reduced rough sleeping to very low numbers, and reduced all forms of homelessness to a 'functional zero'.[9]

Key to such large scale implementation of Housing First is the role of the Finnish national housing association, the Y-Foundation. This organisation specifically focuses on providing housing to people who have experienced homelessness. Between 2008 and 2015, approximately 3,500 new dwellings were built for people experiencing homelessness and 350 new social work professionals were employed to work specifically with them.[10] According to FEANTSA, the European Federation of National Organisations working with the Homeless, Finland is the only European Union (EU) country where homelessness continues to decrease.[11]

Denmark's national Homelessness Strategy from 2009- 2013 introduced one of the first large-scale Housing First programmes in Europe. It housed more than 1,000 people and featured housing retention rates of between 74 per cent and 95 per cent.[12]

There is further evidence of high levels of housing retention across Europe, North America and Australia. For example, in Canada the RCT study into the two-year Chez Soi programme found that Housing First participants spent 73 per cent of their time stably housed over the evaluation period.[13] This is compared to 32 per cent of those receiving Treatment as Usual in the Canadian homelessness system. Similarly, two published studies on the Street to Home project in Australia show that after one year 95 per cent of clients sustained housing in Brisbane. Eighty per cent had been housed for one year or longer in Melbourne.[14]

The high tenancy sustainment rates of international Housing First projects make the case for extending Housing First across Great Britain.

9 The concept of functional zero can be summarised as a state in which experience of homelessness is rare and, where it does occur, it is dealt with quickly and permanently
10 The Centre for Social Justice (2017) *Housing First: Housing led solutions to rough sleeping and homelessness*. London: The Centre for Social Justice.
11 Abbé Pierre Foundation – Feantsa (2018) Third Overview of Housing Exclusion in Europe 2018
12 Benjaminsen, L (2013) 'Policy Review Up-date: Results from the Housing First based Danish Homelessness Strategy', *European Journal of Homelessness* 7.2, pp. 109-131.
13 Palepu, A., Patterson, M. L., Moniruzzman, A., Frankish, C.J. and Summers (2013) 'Housing First improves residential stability in homeless adults with concurrent substance dependence and mental disorders', *American Journal of Public Health*, 103(S2).
14 Johnson, G. and Chamberlain, C (2015) *Evaluation of the Melbourne Street to Home programme: Final Report*. Melbourne: HomeGround Services.

Table 9: Housing First: housing solutions

Country	Housing outcomes
Finland	*National Housing First programme:* Virtual eradication of rough sleeping and a drastic and continued reduction in the numbers of other homeless people.[15]
Denmark	*National Housing First programme:* Between 74% and 95% of people housed in 2009 to 2013 maintained their housing.[16]
Canada	*Chez Soi programme:* 73% of people housed in the programme, compared to 32% of those receiving Treatment as Usual.[17]
US	*Pathways to Housing:* 85% of participants housed in the programme for a period of five years.[18]
France	*Un Chez Soi d'abord:* 85% housing retention after two years.[19]
Australia	*The Street to Home Brisbane:* 95% of clients sustained housing in Brisbane after one year.[20] *The Street to Home Melbourne:* 80% of participants had been housed for one year or longer.[21]

In addition to strong housing sustainment rates, Housing First projects worldwide have wider positive impacts on people's lives.

The Street to Home Melbourne evaluation found that there was significant improvement in the participants' physical and mental health in the first 12 months. Sixty three per cent said their general health was better; 24 per cent reported moderate to extreme bodily pain after 12 months, compared with 54 per cent when first interviewed.[22] The number of participants admitted to hospital in the preceding three months declined from 32 per cent in the first interview to 11 per cent in the final interview, two years after housing.
In a study of five European projects, improvements in mental health problems were reported for most participants in Amsterdam (no exact figures supplied) and Glasgow (50 per cent).[23] In Lisbon there was a 52 per cent reduction in participants admitted to psychiatric hospitals from the start of the project to the three-year follow-up.[24]

Similarly, while the evidence on reductions in substance misuse is more mixed, on balance Housing First is equally and sometimes more effective than a treatment first approach.[25]

Both qualitative and quantitative research shows that Housing First participants are less likely to be involved in crime.[26] Woodhall-Melnik and Dunn found in their systematic review strong evidence that Housing First reduces criminal activity.[27]

Examining the evidence from Great Britain

Evidence from Housing First projects in Great Britain is largely in line with those internationally. It demonstrates how, if adopted on a large scale, this approach could significantly reduce homelessness for people with high level needs. It also shows how it improves other health and wellbeing outcomes.

In 2015, the University of York published findings from a study of nine Housing First services.[28] They found that 74 per cent of current participants were successfully housed for one year or more. Data collected from 60 Housing First participants showed that:

- 43 per cent reported 'very bad or bad' physical health a year before using Housing First, this fell to 28 per cent when asked about current health
- 52 per cent reported 'bad or very bad' mental health a year before using Housing First, falling to 18 per cent when asked about current mental health
- 71 per cent reported they would 'drink until they felt drunk' a year before using Housing First, falling to 56 per cent when asked about current use
- 66 per cent reported drug use a year before using Housing First, falling to 53 per cent when asked about current use.

Threshold Housing First project[29]
Threshold is a housing advice and support charity, part of the Jigsaw Group. Threshold Housing Project has been delivering a high-fidelity Housing First Service for women offenders with complex needs since 2015.

The pilot was originally set up to support 12 women. It has subsequently received funding for a further three years. The project works specifically

15 Y-Foundation (2017) *A Home of Your Own Housing First and ending homelessness in Finland*. Keuruu: Otava Book Printing Ltd.
16 Benjaminsen, L. (2013) 'Policy Review Up-date: Results from the Housing First based Danish Homelessness Strategy', *European Journal of Homelessness* 7.2, pp. 109-131.
17 Palepu, A., Patterson, M. L., Moniruzzman, A., Frankish, C.J. and Summers (2013) 'Housing First improves residential stability in homeless adults with concurrent substance dependence and mental disorders', *American Journal of Public Health*, 103(S2).
18 Stefancic, A. and Tsemberis, S. (2007) 'Housing First for Long-Term Shelter Dwellers with Psychiatric Disabilities in a Suburban County: A Four-Year Study of Housing Access and Retention', *The Journal of Primary Prevention*. 28(3–4), pp. 265–279.
19 Result reported in conference presentation and relayed in blog: (2017) '85 percent of homeless persons in France keep their home after two years', *Homeeu*, 17 April. http://www.home-eu.org/85-percent-homeless-persons-france-keep-home-two-years/
20 Parsell, C. and Tomaszewski, T. (2013) *Evaluation of the Brisbane Street to Home programme: Final Report*. Canberra: Department of Families, Housing, Community Services and Indigenous Affairs. http://wahousinghub.org.au/display/RES/2014/11/12/An+Evaluation+of+Brisbane+Street+to+Home%3A+Final+Report.
21 Johnson, G. and Chamberlain, C. (2015) *Evaluation of the Melbourne Street to Home programme: Final Report*. Melbourne: HomeGround Services.
22 Johnson, G. and Chamberlain, C. (2015) *Evaluation of the Melbourne Street to Home programme: Final Report*. Melbourne: HomeGround Services.
23 Johnsen, S. (2013) *Turning Point Scotland's Housing First Project Evaluation: Final Report*. Glasgow: Turning Point Scotland.
24 Ornelas, J. (2013) *Casas Primeiro, Lisboa. Final Report for Housing First Europe Project (Lisbon)*. http://www.giss-ev.de/files/giss/upload/PDF%20HFE/Lisbon_HFE_Local_Evaluation.pdf
25 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.
26 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.
27 Woodhall-Melnik, J. R. and Dunn, J. R. (2016) 'A systematic review of outcomes associated with participation in Housing First programs', *Housing Studies*. 31(3), pp. 287–304.
28 Pleace, N. and Bretheton J. (2015) *Housing First in England: An Evaluation of Nine Services*. York: Centre for Housing Policy.
29 Quilgars, D. and Pleace, N. (2018) *The Threshold Housing First Pilot for Women with an Offending History: The First Two Years, Report of the University of York Evaluation*. York: Centre for Housing Policy; The Centre for Social Justice (2017) *Housing First: Housing led solutions to rough sleeping and homelessness*. London: The Centre for Social Justice.

with persistent and prolific female offenders who have a history of homelessness in three local authority areas in Greater Manchester. These are: Tameside; Stockport and Oldham. Between April 2015 to April 2018, 39 women used the Threshold Housing First service.

Outcomes
By April 2018:

- 26 of the 39 women using Housing First had been found tenancies by the Housing First service. One woman is very new into the service and the project is still in the process of sourcing accommodation for her.
- Of the 26 women in tenancies, 26 women had retained their housing (including 15 planned moves within this timeframe) in April 2018. In addition, two of the 39 women had been supported by the project to move on from tenancies to live with other family members. Two tenancies were abandoned.
- Only four women were either returned to prison and/or committed an offence during the period they were supported by the project.
- Three women went into supported housing on a temporary basis (two women went into refuge accommodation and another woman went into specialist supported accommodation for people with complex needs).

A recent evaluation by the University of York noted that Threshold represented: "the first significant attempt to develop a specialist form of Housing First, targeted at homeless women who had a history of offending".

"Women who were in sustained contact with Threshold Housing First appeared to show a marked reduction in convictions and offending behavior, compared to the patterns of convictions they reported prior to engaging with the service.

Statutory agencies spoke about how the service was providing 'protective factors' via stable accommodation and getting people out of abusive situations, and addressing other 'criminogenic' risk factors related to reoffending (such as addressing financial problems).

The research indicates that there is a case for exploring variants of the Housing First model which are specifically focused on homeless women with complex needs.

There is a case for Threshold Housing First to be integrated into the strategic response to homelessness across GMCA, where it has the potential to play a preventative role, deliver relief from homelessness at a crisis point and provide sustainable exits from homelessness for women with high and complex needs".

Threshold's work helps fulfil the 'Transforming Justice and Rehabilitation' work-strand of the Greater Manchester Combined Authorities Public Sector Reform programme. Within Threshold's Housing First Model it has become apparent that treating women as 'victims' of trauma delivered better results than treating them as perpetrators of high levels of offending.

Turning Point Scotland – Glasgow Housing First project[30]
This was the first Housing First project in the UK. It was developed to help people in Glasgow with substance misuse problems that were repeatedly becoming homeless. The project was evaluated in 2013, after three years supporting 22 people. The project has grown in scale since then, but at this stage of evaluation was described as below.

The Housing First project included six members of staff – three were peer support workers with histories of homelessness. Support plans were developed on a client-centred basis; assertive outreach and motivational techniques were employed.

Most participants were male, aged between 25 and 44. Almost all had experienced repeat homelessness and time in institutional care. This included prison, rehabilitation facilities, hospital and/or psychiatric wards.

Outcomes

- Most people involved in the project sustained their tenancies continuously. No evictions were recorded, but one participant lost their tenancy because of a long prison sentence.
- The physical health of the tenants vastly improved over the three years. Some, however, suffered from ongoing physical health issues and a number from periodic fluctuations in mental health.
- There was an overall reduction in the severity of participants' dependence on illicit drugs.
- Involvement with the criminal justice system and levels of participation in street culture activities (eg begging or sex work) declined overall.
- The satisfaction levels of the people involved with the project have been very high.

Last year the Homeless Link Annual Review of Single Homelessness Support in England found that 42 per cent of homelessness accommodation projects had turned people away because their needs were too complex. Fifty nine per cent said they had turned people away because their needs were too high and 71 per cent had turned someone away because they were deemed to be too high risk.[31]

We also commissioned a Housing First feasibility study in the Liverpool City Region. Here we found that the current hostel-based model, in this context, often does not work well for homeless people with complex needs.[32]

This is because of a number of reasons, including living in an environment that is challenging because of other residents' addictions or other complex issues. Some people also find it difficult to comply with the rules and conditions of hostels. They can find the lack of stability and security of short stay hostel placements distressing. They may also suffer if there is limited mental health, substance misuse and psychological support available.

The study found that people with complex needs are at high risk of frequent evictions from hostels, they may get stuck within the hostel system, or reject services altogether. Nearly one in three of those people with the highest needs were not receiving or accepting any accommodation placement.[33]

In 2017, the homelessness charity Groundswell conducted a peer-led research project for the Hammersmith and Fulham Commission on Rough Sleeping. They interviewed 108 people with experience of sleeping rough in

30 Johnsen, S. (2014) *Turning Point Scotland's Housing First Project Evaluation.* Edinburgh: Heriot-Watt University and Turning Point Scotland.

31 Homeless Link (2018) *Support for single homeless people in England Annual Review 2017.* London: Homeless Link.

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

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

the borough. This was approximately half of the total number sleeping rough.[34]

Of the 108 interviewees, only two people stated that they wanted to live in a homeless hostel. In two separate focus groups, participants agreed they would prefer to be in prison than in a hostel. Resistance to moving into hostels was common. Corroborating extensive qualitative evidence collected in the UK,[35] participants explained that the chaotic environment, poor quality accommodation and limited opportunities for moving on were key deterrents. Drawing on the evidence provided, the report concluded that the use of Housing First should be expanded.

These findings are reflected in the views expressed by people with experience of homelessness in the consultation we carried out to inform this plan. Participants strongly felt that more suitable accommodation for vulnerable groups was needed. They expressed concern that hostels and accommodation without support could create an unsafe environment and cause people to leave their accommodation because it feels 'safer on the street'.[36]

"People with different needs all end up in the same place –offenders, drug and alcohol users and people who are not. It is unsafe, chaotic, people get robbed, bullied – especially if they are vulnerable with special needs, young, not street wise)."

(Consulation participant, Leicester)

This evidence comes at a time when investment in homelessness accommodation is declining. Last year, 39 per cent of homeless accommodation projects in England reported a decline in their funding from the previous year.[37]

Aside from Housing Benefit contributions, funding for homelessness accommodation at a local level comes from housing-related support (formerly known as Supporting People). While spending specifically on homelessness has increased (by 13%) since 2010, reflecting the priority given to this area by government, overall spending on housing dropped by 46 per cent in real terms, with an even larger cutback (67%) in the Supporting People programme.[38] Consequently, homelessness accommodation projects are providing services to an increasing number of people with less money for support and staff time. The Welsh Government's proposal, to merge Supporting People with a wider series of non-housing grants and remove longer-term certainty about the funding level presents a similar risk, and is an area of major concern to the sector.[39]

In Scotland, all eligible homeless people have a right to rehousing. However, rough sleeping, and other entrenched forms of homelessness, remain for people who face multiple exclusion. This demonstrates that for people with high support needs simply getting them into mainstream accommodation is not enough. They need the support package provided by Housing First to end their homelessness.

34 Blood, I., Copeman, I., Goldup, M., Pleace, N., Bretherton, J. and Dulson, S. (2017) *Housing First Feasibility Study for the Liverpool City Region*. London: Crisis.
35 Crisis, Groundswell and uscreates (2018) *The lived experience of homelessness*. London: Crisis.
36 Crisis, Groundswell and uscreates (2018) *The lived experience of homelessness*. London: Crisis.
37 Homeless Link (2018) *Support for single homeless people in England Annual Review 2017*. London: Homeless Link.
38 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2017) *The homelessness monitor: England 2017*. London: Crisis.
39 National Assembly for Wales Equality, Local Government and Communities Committee (2018) *Life on the streets: preventing and tackling rough sleeping in Wales*. Cardiff: National Assembly for Wales.

In Wales, last year (2017) there were 1,233 households legally defined as homeless, but for whom the local authority was unable to resolve their homelessness.[40] Furthermore, rough sleeping continues to rise, indicating the gap in provision for those people often facing the higher levels of need.

Despite strong evidence of Housing First success in ending homelessness for people with higher levels of support needs, there are only a few and relatively new projects in Great Britain. A recent Homeless Link report found that there are only 32 known Housing First projects operating in England.[41] While comparable data on the number of schemes operating in Scotland and Wales is not available, we know that the number of projects are limited.

England

Most of these projects in England operate on a very small scale (26 of the active services can support 350 people between them at any given time).[42] Two thirds are local authority funded. Most of these projects are funded on very short commissioning cycles of two to three years. This provides very little certainty regarding the provision of long-term support.

It could be argued that the current funding and commissioning context undermines the need for flexible and open-ended support, one of the key principles of Housing First. Similarly, the piloting of Housing First is not really Housing First in its truest sense. This is because the notion of a pilot project undermines one of its key principles: that housing and support should be provided for as long as the participant needs it.

Housing First has been gathering strong political backing across England, Scotland and Wales. Ahead of the 2017 General Election, commitments to expand the use of Housing First were pledged by the Conservatives, Labour and the Liberal Democrats. This demonstrates the extremely strong, cross-party support for the policy. Following the General Election, the Westminster Government committed £28 million in the 2017 autumn budget 2017 to pilot Housing First in Greater Manchester, the Liverpool City Region, and the West Midlands.

Wales

In light of the increasing numbers of rough sleepers, interest is growing in developing an alternative approach to tackling homelessness for people with the highest support needs. *The Housing (Wales) Act (2014)* provides an important focus on prevention activity. However, it does not make suitable provision for people who are already homeless and not necessarily in priority need.

The Welsh Government now funds ten pilot projects to test the impact of different approaches of delivering Housing First. The government has recently endorsed the use of Housing First to tackle longer-term rough sleeping, particularly for people unwilling or unable to live in hostels or other shared living situations. Housing First received significant coverage in the recent Welsh Assembly's Equality, Local Government and Communities Committee inquiry into Rough Sleeping.[43]

A highly effective Housing First project has operated in Anglesey since 2012. This is commissioned by the Isle of Anglesey County Council and run by the Welsh homelessness charity, the Wallich. Of the 119 Housing First

40 Fitzpatrick S., Pawson H., Bramley G., Wilcox S., Watts B. and Wood, J. (2017) *The Homelessness Monitor: Wales 2017*. London: Crisis.
41 Homeless Link (forthcoming) *The picture of Housing First in England*. London: Homeless Link.
42 Homeless Link (forthcoming) *The picture of Housing First in England*. London: Homeless Link.
43 National Assembly for Wales Equality, Local Government and Communities Committee (2018) *Life on the streets: preventing and tackling rough sleeping in Wales*. Cardiff: National Assembly for Wales

recipients supported between April 2012 and August 2017: 78 per cent are still in accommodation; 43 per cent are in the original accommodation where the support was provided.[44]

Scotland
The first Housing First project established in the UK was developed by Turning Point Scotland in 2010.[45] As in Wales and England, momentum has gathered to extend Housing First over the last couple of years.

More recently, the Homelessness and Rough Sleeping Action Group in Scotland recommended that housing-led approaches should be the default option for people experiencing homelessness.[46]

Housing-led approaches focus on rapidly rehousing people into settled accommodation as quickly as possible. An accommodation package is accompanied by a package of lower intensity support than Housing First. This support is often time-limited, unlike Housing First which is open-ended. They also recommend that where the person has more complex needs the offer should be Housing First.[47] The Scottish Government has accepted this principle. An implementation framework will be published in June 2018 to help all 32 local authorities develop, cost and schedule a local 'Rapid Rehousing Transition Plan' by December 2018.

These local plans will set out how to ensure all households spend less time in temporary accommodation. Housing First will be the default for households with more complex support needs. Local plans will also set out how they intend to integrate existing Housing First initiatives and their capacity planning for future need at a local level. The Scottish Government is also developing a national Housing First programme, which has been given considerable momentum and £3 million of funding by Social Bite.[48]

9.3 Scaling up Housing First across Great Britain

The role of Housing First

Housing First is clearly a highly effective homelessness intervention that can powerfully change the lives of people with complex and multiple needs. Extending the provision of Housing First would, over time, also change the way homelessness services are delivered across Great Britain.

The introduction of Housing First does not mean replacement of the hostel and supported housing system; but it does allow us to reconsider the role and scope of hostels in reducing homelessness. Immediate reductions of supported accommodation would only increase rough sleeping. But Housing First, alongside a housing-led approach, presents a critical opportunity to help free up emergency accommodation for its stated purpose – short-term emergencies.

Specialist supported housing for homeless people needing extremely high levels of long-term medical support will also still be required. It is important to distinguish this level of support from traditional homelessness services, as it requires health and social care expertise, and must be inspected by the independent regulator of health and social care in each nation.[49]

The implementation of Housing First at scale, also requires careful transition planning to ensure there are no gaps in service for homeless people. The Liverpool City Region feasibility study identified that to successfully switch to the Housing First model, a two-year period of double funding is needed. This is to ensure the continuation of existing provision and the successful adoption of Housing First and other housing-led solutions.[50] The length of time required to switch to Housing First will vary across regions and nations depending on existing homelessness services offered.

What should Housing First look like?

Model of support
Housing First works effectively when a high-fidelity model is applied.[51] A report from Homeless Link, examining evidence on the scale of Housing First in England, found that adherence – 'fidelity' – to the Housing First model is mixed. Some projects drift away from the core philosophy and provide a more housing-led approach accompanied by floating support.[52] Participants in the extensive consultation we undertook to inform our plan also emphasised the importance of ensuring that projects remained faithful to the Housing First principles.[53]

The Housing First Europe Hub also provides a useful guide on how the principles can be adapted to the context of each country.[54] Homeless Link's Housing First England project is developing and supporting a national movement of Housing First services across England. To help expand Housing First, the project has devised a key set of principles. These are to ensure that projects meet a high-fidelity test and work most effectively to end homelessness for people with the highest level of support needs.[55]

Similarly, the Welsh Government has published national principles and guidance for Housing First in Wales. Cymorth Cymru has established a Housing First Network for Wales, to support the delivery of high-fidelity Housing First in Wales. The Housing First Scotland partnership also aims to clearly define the guiding principles for Housing First in Scotland. The Imogen Blood study explored what these principles should look like across Great Britain.[56]

44 Chartered Institute of Housing (2017) *Housing First in the UK and Ireland*. London: Chartered Institute of Housing.
45 Chartered Institute of Housing (2017) *Housing First in the UK and Ireland*. London: Chartered Institute of Housing.
46 Scottish Government (2018) *Ending Rough Sleeping in Scotland: An interim report on the activity of the Homelessness and Rough Sleeping Action Group*. https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group
47 Scottish Government (2018) *Ending Rough Sleeping in Scotland: An interim report on the activity of the Homelessness and Rough Sleeping Action Group*. https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group
48 Edinburgh Evening News (February 2018) *'Social Bite pledges £3m to move homeless people into flats'* https://www.edinburghnews.scotsman.com/news/social-bite-pledges-3m-to-move-homeless-people-into-flats-1-4685592
49 England: The Care Quality Commission; Wales: Healthcare Inspectorate; Scotland: Care Inspectorate.
50 Blood, I., Copeman, I., Goldup, M., Pleace, N., Bretherton, J. and Dulson, S. (2017) *Housing First Feasibility Study for the Liverpool City Region*. London: Crisis.
51 Mackie, P., Johnsen, S. & Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.
52 Homeless Link (2015) *'Housing First' or 'Housing Led'? The current picture of Housing First in England*. London: Homeless Link.
53 Hughes, N. (2018) *Have your say policy consultation: summary report*. London: Crisis.
54 Housing First Europe Hub, http://housingfirsteurope.eu/guide/what-is-housing-first/introducing-housing-first/
55 Homeless Link (2015) *'Housing First' or 'Housing Led'? The current picture of Housing First in England*. London: Homeless Link.
56 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales*. Imogen Blood and Associates. London: Crisis and Homeless Link.

- **People have a right to a home.** Housing First prioritises access to housing as quickly as possible. Eligibility for housing is not contingent on any conditions other than willingness to maintain a tenancy. Participants will not lose their housing if they disengage or no longer require the support. Participants will be given their own tenancy agreement.

- **Flexible support is provided for as long as it is needed.** This principle is perhaps the most challenging to deliver within traditional commissioning cycles. However, it is probably the one that distinguishes Housing First most clearly from other forms of floating support. Within Housing First projects the support that can be provided is unlimited, but the study found people will not necessarily need support for the rest of their lives. Support needs will typically taper off over time. But the flexibility allows for help to be given quickly when needed, without someone needing to be re-referred and re-assessed.

- **Housing and support are separated.** It is essential that tenancies are not dependent on someone's willingness to accept support for other problems. This allows people to maintain their tenancy, even if they do not engage with support. Furthermore, the support continues even if the person goes to prison, returns to the streets, is admitted to hospital, etc.

- **Individuals have choice and control.** People should be given choice about the services on offer to them, and whether or not they wish to use them. The study found evidence that this choice, for people with higher, more complex support needs, leads to better outcomes.

- **An active engagement approach.** Many practitioners interviewed for the Imogen Blood study said dedicated caseworkers who regularly contact clients, and who can be contacted themselves at short notice are important. Housing First projects must also work closely with, or have an assertive outreach team embedded within their service. The team should work in a persistent, long-term and open-ended way with rough sleepers concerned about moving from the streets into settled housing.

- **Based on people's strengths, goals and aspirations.** The belief that everyone has the capacity to change and improve their own lives is central to the model. Improving self-esteem is key in achieving this. Working closely and designing the support needed with Housing First participants to agree what they would like to achieve is crucial.

- **A harm minimisation approach.** This approach respects someone's current wishes and behaviour. It involves encouraging them to use drug and alcohol treatment services, where appropriate, but does not require them to do so as a condition of their tenancy.

The Imogen Blood study clearly highlights the need for long-term investment in longer-term commissioning for the wraparound support package for Housing First. But the usual commissioning cycles of two to three years (or in some cases even shorter pilots) are too short for Housing First projects to be truly effective. In England, almost half (43%) of Housing First projects only have secure funding for only one to two years.[57] A number of the people interviewed as part of the study described how shorter-term commissioning cycles meant that projects could not truly be described as Housing First.

57 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales.* Imogen Blood and Associates. London: Crisis and Homeless Link.

The report also stressed the importance of better joint commissioning and delivery of Housing First. Despite the significant projected cost savings for the English health and the justice systems, only 11 per cent of projects receive funding from multiple sources.[58]

A 2015 report from Homeless Link found that the main source of funding is from housing-related support.[59] The provision of an integrated package of support via a multi-disciplinary team is likely to be best achieved through some form of joint commissioning, particularly across health and homelessness teams.

Pathways to Housing in the US uses an Assertive Community Treatment (ACT) model. This provides participants with a multi-disciplinary team offering a range of services delivered by specialist, medical practitioners.

This model is more relevant in the US where homeless people struggle to get healthcare due to the lack of universal provision. This is a much more expensive way of delivering support and the structure is not applicable to Britain where people are not individually charged for health care.

An alternative to an ACT approach is the Intensive Case Management (ICM) model. Here a tenant has a key support worker from the Housing First project. This worker helps the tenant get the services they need. This could include: drug and alcohol services; mental health teams, and criminal justice agencies. This approach is more relevant and prevalent in a British context.[60]

However, our Liverpool City Region feasibility study found gaps mental health support for Housing First participants. Consequently, interviewees felt it essential to ensure that specialist mental health support workers were included in the Housing First team itself.[61]

Housing First tenancies

To extend Housing First across Great Britain it is essential that there are enough homes to offer a tenant long-term security. The Imogen Blood report demonstrates that tenancies allocated in the social rented sector are likely to have more long-term security. However, there is still scope to replicate this offer in the private rented sector with the right measures put in place.[62] It should be noted that the new Private Residential Tenancy in Scotland provides tenants with far greater security of tenure.

Congregate models of Housing First – where formerly homeless tenants have self-contained units within the same building – are more common in North American Housing First projects. However, evidence indicates that individual tenancies in self-contained properties scattered in the community work best.[63] The Imogen Blood report interviewees explained that self-contained dispersed properties allow people to move away from living with other people, who in many cases

58 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales.* Imogen Blood and Associates. London: Crisis and Homeless Link.
59 Homeless Link (2015) *'Housing First' or 'Housing Led'? The current picture of Housing First in England.* London: Homeless Link.
60 Homeless Link (2015) *'Housing First' or 'Housing Led'? The current picture of Housing First in England.* London: Homeless Link.
61 Blood, I., Copeman, I., Goldup, M., Pleace, N., Bretherton, J. and Dulson, S. (2017) *Housing First Feasibility Study for the Liverpool City Region*. London: Crisis.
62 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales.* Imogen Blood and Associates. London: Crisis and Homeless Link.
63 Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

share some of the same issues.[64] That said, any programme should provide different kinds of housing options to meet the needs of individuals.

Having a flexible approach – using housing provided by different social and private sector landlords, and ideally across local authority boundaries – can be beneficial and give Housing First participants choice. The establishment of local housing agencies, independent of the council and housing associations, is a way to lease social and private rented stock and achieve this. This recommendation was proposed in the Liverpool City Region feasibility study.

How to fund Housing First projects
There are several factors to consider when designing the funding and commissioning structures for Housing First. The need for longer-term and integrated support packages is a particular consideration.

There are a number of options that governments could consider to develop and extend Housing First. We would recommend the governments considers the following approach:

- **Funding rent through the mainstream Housing Benefit system. This is provided that sufficient exemptions to the Benefit Cap, conditionality and the Shared Accommodation Rate are applied**
  Housing Benefit could be paid at standard rates to cover rental costs. National governments would need to provide additional funding to local authorities to commission services to procure Housing First stock and provide the support package for tenants. The benefit of this approach is that it reinforces the concept that getting a tenancy is not dependent on working with support services. The support could remain in place even if the person was no longer in that tenancy if, for example, they went to prison. Furthermore, separating the two funding streams would make it easier for one agency to provide housing and for a more specialist agency to provide the support package.

Targeting Housing First – defining the people who need it
Housing First is for homeless people who have complex needs. As outlined above, the evidence shows that there are extremely strong housing sustainment rates for this group.

Defining Housing First participants
They are people who:

- **are currently homeless** *and*
- **have complex or multiple support needs:** This includes a combination of some history of mental health issues, substance misuse and offending behaviour.[65]

Calculating the numbers
Four sources were used to estimate and then cross tabulate the potential size of homeless populations with complex or many needs.[66] A full explanation of the methodology is contained in the published report from Imogen Blood.[67]

64 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales*. Imogen Blood Associates. London: Crisis and Homeless Link.
65 (NB. We did not include, but recognise that this definition should ideally be extended to include experience of domestic abuse and/or physical health problems).
66 Bramley, G, Fitzpatrick, S with Edwards, J, Ford, D, Johnsen, S, Sosenko, F and Watkins, D (2015) *Hard Edges: Mapping severed and multiple disadvantage (England).* London: Lankelly Chase Foundation: Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis: Mackie, P with Thomas, I (2014) *Nations Apart?: Experiences of single homeless people across Great Britain*. London: Crisis: Bramley, G, Fitzpatrick, S, Sosenko, F (2017) *Destitution in the UK 2017.* York: Joseph Rowntree Foundation.
67 Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales*. Imogen Blood and Associates. London: Crisis and Homeless Link.

High Estimate	32,261
Low Estimate	18,376

High estimate – The total homeless population estimate from The Lankelly Chase commissioned Hard Edges study, undertaken by Heriot-Watt University was 186,012 people in 2010/11. It was then reduced to the numbers who had experienced substance misuse, offending behaviour, and known mental health problems.[68] This totalled 23,751 people (12.8 per cent of the total homeless estimate).

The Joseph Rowntree Foundation destitution research was then used to provide estimates of the proportions of people with complex needs in each nation.

The Crisis Heriot-Watt core homelessness research then provided a multiplier of the data set between 2011 and 2016, producing new totals for each country in Britain. This added up to 35,844.

Applying the assumption that ten per cent of this population would not be able or not want to take up the Housing First offer, produced the final high estimate of 32,261 people. This group of people would still require a long-term supported accommodation option.

Low estimate – The same methodology as above. This is apart from the initial overall 2011 estimate of 119,900 people taken from the first core homelessness report.

We then applied the 12.8 per cent figure calculated in the previous set of calculations to this figure to produce a total of 15,310 people. This estimated the size of the homeless complex needs population in Great Britain in 2011.

Applying the same multiplier to uplift this to 2016 levels for each nation produced a total number of people of 20,417, reduced by ten per cent as above. This produced a final low estimate of 18,376 people.

Based on these definitions, our estimates of the current population who might benefit from Housing First in England, Scotland and Wales (aggregated) are as follows.

National breakdowns

	England	Scotland	Wales	GB total
High	29,678	1,470	1,113	32,261
Low	16,434	1,356	586	18,376

For the purposes of this report, and to align with the core homelessness estimates throughout, the low estimate for a potential cohort of Housing First is suggested as a starting point.

This addresses the backlog of need. Going forward, the use of Housing First as a preventative approach will require additional housing units to be procured and funded.

68 Bramley G, Fitzpatrick S, Edwards J, Ford D, Johnsen S, Sosenko F and Watkins D, (2015) *Hard Edges: mapping severe and multiple disadvantage*. London: Lankelly Chase Foundation.

9.4 Moving forward – the role of national governments in scaling up Housing First

Strategic leadership from national government has been central to the successful implementation of Housing First in a number of international examples. And Housing First, where integrated within a wider homelessness strategy, has been extremely effective in reducing the overall number of people experiencing homelessness.

In many of these contexts, Housing First has driven the need for broader policy change relating to homelessness. This includes providing affordable and accessible housing, a robust welfare safety net, a stronger prevention agenda and housing-led solutions for people with lower support needs. A similar approach will be critical to rolling out Housing First successfully across Great Britain.

As outlined above, there is now strong political commitment from the Westminster, Scottish and Welsh Governments to deliver more Housing First to reduce homelessness. The following sections outlines suggested actions to ensure that these commitments for each government are realised.

A national director for Housing First

Strategic oversight of Housing First in each nation is necessary. This should ensure the successful delivery across different geographies and that the overall programme is successful in its fidelity, housing targets, evaluation etc. Given the need for co-ordination across government departments in each nation, this role would provide leadership and focus to those efforts. This is a highly recommended approach and has recently been adopted in Ireland, as part of the Rebuilding Ireland strategy.[69]

National and local targets for the delivery of Housing First projects

Overall targets for the delivery of Housing First, should be set and monitored by a national director, and then fall to local authorities. As set out in Chapters 7 'Rapid rehousing' and 11 'Housing solutions', they should align with local strategies that identify the housing and support targets for rough sleepers and other homeless groups and national targets for the supply and accessibility of affordable homes for people with experience of homelessness. Identifying the people eligible for Housing First within this is crucial and will guide the commissioning of ICM support teams, and accessing the requisite accommodation. In Scotland, these targets should be identified as part of the new Rapid Rehousing Transition Plans.

Help deliver the housing supply needed for Housing First tenancies

To fulfil the additional housing requirements needed to scale up Housing First (and other housing-led approaches), new and bold measures are required to acquire additional accommodation. This accommodation should be both in social housing and the private rented market. A lack of affordable, accessible housing stock is frequently cited as one of the key challenges in extending Housing First across Great Britain.[70]

Any target for numbers of homeless people accessing Housing First, must bring with it a corresponding target for housing units. Finland's Housing First success has all-but eradicated rough sleeping, and led to the decommissioning of hostels and night shelters. It has done this, in part by building new housing stock and setting targets for local areas to do so.[71]

The Finnish Government has played a direct role in increasing the supply of new housing stock specifically earmarked for Housing First tenancies. In Finland, housing is principally provided by the Y-Foundation. This is a housing association specifically for people who have experienced homelessness.

Finland's Slot Machine Association has provided 50 per cent grants for purchasing flats from the general housing market. The Y-Foundation has also received funding from the Housing Finance and Development Centre (ARA) to help build new housing. ARA sets regional targets for affordable house building. It also provides state guarantee and interest subsidies for building social housing and investment subsidies for improving housing conditions for groups with special needs. This includes people who have experienced homelessness. Between 2008 and 2015, approximately 3,500 new dwellings were built for people experiencing homelessness and 350 new social work professionals were employed to work specifically with them. Key to such large-scale implementation of Housing First is the national partnership of state authorities, local authorities and NGOs. The role the Finnish national housing association, the Y-Foundation, is crucial.

Similarly, the Australian Government has committed $10 billion to invest in social housing as part of a broader package of spending and policy reforms. These are set out in the National Affordable Housing Agreement to tackle homelessness[72] and include the expansion of Housing First.

Chapter 11 sets out a range of solutions that national governments should implement to increase the supply of affordable and accessible housing. Implementing these solutions will significantly increase housing options for homeless people. They are critical to the successful implementation of Housing First.

It is, however, necessary to allocate a proportion of housing units in the social rented sector for use in Housing First projects. This is to ensure sufficient access to properties as quickly as rough sleepers and others can be offered them. It is also to ensure a dispersed stock across different cities, and local areas.

Collect and publish data on the fidelity and outcomes of Housing First projects

A shared outcomes and fidelity framework for the three nations is critical. The framework will provide a consistent way of collecting and sharing information and measuring success. Outcomes should relate to housing sustainment rates, health and wellbeing, and reductions in criminal activity and anti-social behaviour. It should be noted that a framework will also be needed to collect information on the adherence to the principles of Housing First. Rigid outcome-only measures rarely account for the 'distance travelled' by an individual. This can often lead to the 'parking' of people who require greater and more specialist levels of support.

Statutory provision of housing and support

As set out in Chapter 8 'Ending rough sleeping', a complete statutory safety net is needed to deal with all circumstances of homelessness and household types to ensure access to long-term rehousing.

69 Government of Ireland, *Rebuilding Ireland Strategy*, http://rebuildingireland.ie/

70 Mackie, P., Johnsen, S. and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

71 Y Foundation (2017) *A Home of Your Own Housing First and ending homelessness in Finland*. Keuruu: Otava Book Printing Ltd

72 Australian Government, Department of Social Services, *National Affordable Housing Agreement*. https://www.dss.gov.au/housing-support/programmes-services/national-affordable-housing-agreement

In England and Wales, housing and support services for single homeless people are largely provided outside the statutory system. While both England and Wales have introduced prevention and relief duties that apply regardless of household type, local authorities have no duty to provide people with settled housing unless homeless people are deemed a 'priority'. This is even if people have very high and complex needs.

Unlike other forms of social care support provided by local authorities there has been no statutory protection for the support services provided to single homeless people. These include hostels, day centres and floating support. It is essential that statutory protections are provided for both housing and support, so that the Housing First model can remain true to its principles.

Universal statutory duty to provide housing. The priority need criteria must be abolished in England and Wales. Scotland has already abolished priority need. Scrapping priority need is an important step to ensuring a statutory guarantee of settled housing for people who are made a Housing First offer.

Universal statutory duty to provide support to people who have experienced homelessness. In addition to abolishing priority need, the support element of Housing First must also be protected as part of the statutory system. This is through a new 'duty to support', applicable via legislation in England and Wales. Scotland already applies such a duty.

Wider reforms necessary for the successful implementation of Housing First

Housing register eligibility. In England, *The Localism Act (2011)* gave councils the power to exclude groups of people designated as non-qualifying from housing registers. Between 2012 and 2017, council housing registers lost 700,000 people. The use of exclusion categories, based on historic rent arrears, a history of anti-social behaviour, local connection, or a previous offending history, have introduced an element of conditionality to eligibility criteria.

Evidence from Wales illustrates the parallels between homelessness intentionality decisions and the exclusion of households from housing registers.[73]

An examination of Housing First projects in England by Homeless Link found that this was one of the biggest barriers for projects trying to set up tenancies.[74] It is highly likely that people most needing Housing First are also likely to have historic rent arrears, a history of anti-social behaviour or a previous offending history. The Westminster Government should revise national allocations guidance to ensure homeless people are not excluded from registering for social housing.

Affordability tests. Many local authorities have expressed concerns that a growing proportion of homeless nominees are not being accepted for rehousing by housing associations on affordability grounds.[75] Evidence from all three nations shows that affordability tests and inflexible requirements of some councils and housing providers are having a negative impact on homeless people and restricting their access to social housing. These can include requiring the first month's rent in advance or repayment of historic rent arrears.[76]

The circumstances that led to someone's homelessness can mean they will not have savings to cover the upfront costs of rent in advance. The Scottish, Welsh and Westminster Governments should develop and share best practice for councils and housing providers on using pre-tenancy assessments, including affordability/financial capability assessments.

Exemptions from the Shared Accommodation Rate. In the private rented sector, the lower rate of benefit for the Shared Accommodation Rate (SAR) is problematic for younger homeless people with a Housing First offer. Because Housing First requires intensive support to be offered within someone's home, shared accommodation is not appropriate to their needs because of the confidentiality and privacy issues involved.

Over 25s who have lived in homeless hostels for at least three months and accepted rehabilitation or support services before moving to the private rented sector are already exempt from the SAR. This is because it was felt this group would benefit much more from living in independent tenancies.

It would make sense for a similar exemption to apply to those moving into Housing First, whether they have come directly from the streets or from a hostel. This should apply to all under 35s.

The wider benefits system must support a flexible, person-centred approach given the high success rates that can be achieved using Housing First. Research shows that homeless people are twice as likely to be sanctioned as the general population. This is despite homeless people usually being unable to comply with conditionality requirements, rather than not wanting to comply.[77]

Homeless people with more complex needs including mental ill health, dependency issues and poor literacy are also more likely to be sanctioned than homeless people without these vulnerabilities.[78] This is problematic, as a Housing First offer is likely to be the most appropriate response to their homelessness.

The application of conditionality is likely to undermine any serious and targeted response to homelessness for people with very complex needs. Benefit conditionality should be automatically suspended for all homeless people that are made a Housing First offer. This will prevent a risk of return to homelessness and rough sleeping. For more information on sanctioning and its impact on homelessness see Chapter 10 'Making welfare work'.

Exempt Housing First participants from the benefit cap. If Housing First tenants are exempted from the benefit cap, Housing First becomes possible and sustainable in the private rented sector. This particularly applies to areas of high-cost housing. It will also mitigate the risk of rough sleeping for those made a Housing First offer.

73 Campbell, J.A. (2011) *The Impact of Intentional Homelessness Decisions on Welsh Households' Lives*. Swansea: Shelter Cymru.

74 Homeless Link (2015) *'Housing First' or 'Housing Led'? The current picture of Housing First in England*. London: Homeless Link.

75 Charted Institute of Housing (2017) *A guide to better partnership working between local authorities and housing associations*. London: Charted Institute of Housing.

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

77 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L. and Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions*. London: Crisis.

78 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L. and Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions*. London: Crisis.

This is because it takes away any pressure of having to manage a gap between Housing Benefit and their rent, particularly given that this group is highly unlikely to be able to gain an exemption from the cap by entering work for a minimum of 16 hours per week.

Investment in personalised budgets for people with complex needs. The 'what works to end rough sleeping' review, commissioned by Crisis and carried out by Cardiff University and Heriot-Watt University, highlighted the key role that personalised budgets should play in delivering a person-centred approach. This is particularly for people who have slept rough for longer periods of time and have higher support needs.[79]

As detailed in Chapter 8 'Ending rough sleeping', this approach must be taken to scale and appropriately funded, alongside assertive outreach teams, to successfully apply Housing First. In Scotland, the Homelessness and Rough Sleeping Action Group has recommended that the Scottish Government establish a national personalised budget fund. This can be used by local teams based on reliable data on the nature and number of rough sleepers in their area.

A wider housing-led approach
As the recommendations above demonstrate, Housing First cannot be implemented as a policy in isolation. It requires much wider changes. These include: stronger prevention polices; a robust welfare safety net; the supply of affordable and accessible housing and a housing-led approach to tackle all forms of homelessness.

Chapter 7 'Rapid rehousing', sets out the reforms necessary to enable a rapid rehousing approach. Both Housing First and lower intensity housing-led services should reduce the need for emergency accommodation over time, and represent a bold shift in tackling and ending homelessness.

9.5 Areas for further research

The Imogen Blood commissioned study highlights a number of other groups experiencing homelessness who would also potentially benefit from a Housing First offer. These groups include people fleeing domestic abuse, young people and prison leavers.

The evidence showing successful outcomes for people with complex needs is very strong. But further research is needed to explore the benefits for other groups and any adaptions that need to be made to the Housing First model.[80] For example, further research could explore whether shared Housing First tenancies would work better for some groups of young people.

The case for improving the way data is linked and shared across a range of statutory and non-statutory services is detailed in Chapter 14 'Homelessness data'. The ability to track people who have experienced homelessness across a range of services would be extremely useful. It could identify their support needs and whether, given their history, they would benefit from a Housing First offer.

79 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.
80 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

Furthermore, tracking people across a range of services would help better understand how people's lives are improving in Housing First tenancies. This is particularly the case for non-housing related outcomes such as changes to physical and mental health for which the evidence base is not quite as strong.

9.6 Conclusion

The Westminster, Welsh and Scottish Governments have each taken initial steps to introduce Housing First. This is very welcome. This chapter has outlined the scale of need for Housing First and the arrangements within governments needed to successfully meet demand.

With careful and thorough planning, the Housing First model can reach its potential. It can end the homelessness of many thousands of people with high support needs who are currently sleeping rough, or living in hostels and night shelters.

Government leadership is required to ensure the model is delivered true to its evidence-based fidelity. It is also required to ensure that the right policy choices on housing, welfare and local funding are made. These choices will help Housing First projects and participants achieve their potential.

Housing First is an essential component of this plan, and of any government plan to end homelessness.

9.7 Summary of recommendations

England/Westminster	Scotland	Wales
• Make Housing First the default option for anyone with complex needs who is experiencing homelessness	• Make Housing First the default option for anyone with complex needs who is experiencing homelessness	• Make Housing First the default option for anyone with complex needs who is experiencing homelessness.
• Appoint a national director for Housing First	• Appoint a national director for Housing First	• Appoint a national director for Housing First
• Oversee the establishment of national and local targets for the delivery of Housing First tenancies	• Oversee the establishment of national and local targets for the delivery of Housing First tenancies	• Oversee the establishment of national and local targets for the delivery of Housing First tenancies
• Invest in the supply of new housing units for Housing First	• Invest in the supply of new housing units for Housing First	• Invest in the supply of new housing units for Housing First
• Collect and publish data on the fidelity and outcomes of Housing First projects	• Collect and publish data on the fidelity and outcomes of Housing First projects	• Collect and publish data on the fidelity and outcomes of Housing First projects
• Abolish priority need to ensure that settled housing is provided to all eligible homeless households	• Ensure that affordability tests do not bar people who have experienced homelessness from social rented tenancies	• Abolish priority need to ensure that settled housing is provided to all eligible homeless households
• Revise national allocations guidance to ensure that homeless people are not excluded from registering for social housing		• Ensure that affordability tests do not bar people who have experienced homelessness from social rented tenancies
• Ensure that affordability tests do not bar people who have experienced homelessness from social rented tenancies		
• Exempt Housing First participants from the Shared Accommodation Rate, the benefit cap, and welfare conditionality and sanctioning		

"We're from the North East but we had to leave there in a hurry a couple of months ago after getting harassed.

We stayed in a couple of bed and breakfasts when we first got here while we tried to register for Housing Benefit. But that was two months ago... we've just been bounced from one place to another ever since.

Basically, because we've got no local connection we were told we weren't eligible for any help at all. We gave them [the council] all the details from the police, but it took six weeks for them to follow it up properly. By that time we'd been forced to move into a tent in the park, just to try and preserve the little money we had.

When we finally got a meeting with them [the council] they suddenly changed their mind and said that after two months living in a tent they were satisfied we were actually homeless after all. But even then, the maximum Housing Benefit we can receive on our joint claim is £408, and most one-bed flats on the market are between £500 - £600.

We did ask about social housing as well, but apparently, there are 358 people in the queue ahead of us already, and only 18 one-bed flats available.

We think our best option is to stay in the tent for another two months and try to save what we can on our own.

We're relying on charity just to survive. We're both quite self-reliant, but we never thought it would take this long to get the help we needed. I know they need to help people with priority issues too, but if we just got that little help sooner we would have been back on our feet in no time."

Thomas and Ruth

Chapter 10:

Making welfare work

A complete welfare safety net is critical in preventing and solving homelessness. A key component to its effectiveness is financial support for housing costs when people need help. This support must cover the real cost of housing in all parts of Great Britain.

Most homeless people want to work, so a successful functioning welfare system also involves meeting these aspirations. Bold reforms to the way employment support is provided will help many more people find and sustain a route out of homelessness and into work.

10.1 Introduction

This chapter outlines how welfare can protect people from homelessness and alleviate it if it happens. We focus on welfare assistance with housing costs through Housing Benefit/ Universal Credit. And we highlight welfare and employment policies that help or hinder sustainable solutions to homelessness.

Providing financial assistance to homeless people should be a source of pride. It shows that we are a civilised society prepared to act to protect people from losing their homes. Despite some shifts in public attitudes regarding who should receive welfare benefits,[1] there is still strong public consensus favouring this kind of social protection.[2]

Homeless people face a welfare system that is a fragmented safety net. Some get the help they need to pay for housing costs, others may get limited, or no financial help at all.

But the safety net can be completed. In this chapter we start with simple principles – to end homelessness, those who cannot afford housing must be given enough assistance to do so. And adequate support must be available to help homeless people into work where it's appropriate for them.

A joined-up approach to support with housing and employment will help to prevent future homelessness for people at risk, reduce the chances of repeat homelessness, and help homeless people into work.

Financial support through the benefits system is crucial in preventing homelessness. It provides low-income households with protection and stable housing. For people who are already homeless, welfare assistance with housing and other costs is a lifeline that helps them leave the devastation of homelessness behind.

Universal Credit, which was introduced in 2013, is the most significant welfare reform in decades. It creates an opportunity to ensure the benefits system works effectively to prevent and respond to homelessness. It is ambitious – its intention is to create a welfare system that helps people achieve financial stability and employability wherever possible.

Universal Credit aims to simplify the current system by bringing together six different benefits[3] (including Housing Benefit) into one single monthly payment. It is also intended to make transitions into work easier and to make work pay.

While the intention behind Universal Credit is promising, a series of changes and falling investment since its original design have reduced entitlement to financial support for the people who need it most. The £1.5 billion package of support through the 2017 autumn budget was a welcome recognition of the additional support needed. This will go some way to reducing financial pressures, especially with housing needs, but there remain other areas in need of investment and policy change.

1 Taylor-Gooby, P. and Taylor, E. (2016) *Benefits and Welfare: Long-term trends or short-term reactions?* London: Natcen.

2 Pearce, N. and Taylor, E. (2013) *British Social Attitudes 30*. London: Natcen.

3 Income based Jobseeker's Allowance, Housing Benefit, Working Tax Credit, Child Tax Credit, income based Employment and Support Allowance and Income Support.

The reduced investment in the system has undermined the original design of Universal Credit. As a result, in its current form it fails to deliver a comprehensive safety net that adequately prevents and responds to homelessness. The situation has also been worsened by administrative errors and delays related to implementation.

People lose their homes when the rising pressure from high rents and low incomes becomes too much. Without government support, a sudden increase in pressure, like losing a job or becoming ill, can quickly force people into homelessness. The welfare system, including Universal Credit in its current form, is worsening the pressure leading to homelessness.

This undermines the efforts by the Westminster, Scottish, and Welsh Governments to tackle and prevent rising homelessness.

Below we explain how the welfare system can have a strong and complete role in responding to and preventing homelessness. We also clearly set out how the welfare system can support the joint goal of stabilising housing and helping people pursue employment.

10.2 Context

Background to Housing Benefit

Housing Benefit will no longer exist when Universal Credit is rolled out completely. However, support with housing costs in Universal Credit will be calculated in much the same way as Housing Benefit. So within this chapter, Housing Benefit and support with housing costs in Universal Credit are synonymous, unless stated otherwise.

The Housing Benefit system was introduced in 1987. Significant reforms to the system began in the early 2000s by the Westminster Government. A key change was the creation of Local Housing Allowance for tenants in the private sector, which was rolled out nationally in 2008.

Local Housing Allowance rates are a way of setting maximum entitlement to Housing Benefit based on the size of the property being rented. In 2009, this was up to a maximum of five-bedroom properties[4] in an area.[5] They were set at the median of rents within an area and the rates were uprated[6] to reflect changes in the prices of local private rents.

Since Local Housing Allowance was rolled out, a rise in insecure and temporary employment, falling wage growth, and overall rising private rents, have meant that more households need support with housing costs.[7]

4 This meant setting Local Housing Allowance rates for: shared accommodation (for those under 25); one bedroom; two bedroom; three bedroom; four bedroom and five bedroom.

5 Local Housing Allowance rates are set by specific areas known as Broad Rental Market Areas (BRMA). A BRMA is defined as 'an area within which a person could reasonably be expected to live having regard to facilities and services for the purpose of health, education, personal banking and shopping, taking account of the distance of travel, by public and private transport, to and from these facilities and services'. There are 152 BRMAs in England, 18 in Scotland, and 22 in Wales.

6 Uprating means to increase the value of the benefit. When Local Housing Allowance was uprated by local rents, this meant that if local private rents grew by two per cent, the relevant Local Housing Allowance rate for that area was increased by two per cent. If local private rates did not grow, then the relevant Local Housing Allowance was not uprated.

7 Lawton, K., Cook, P., Pearce, N. (2014) *The Condition of Britain: Strategies for social renewal.* London: IPPR.

From 1999/2000 to 2009/10, spending on Housing Benefit increased from £11 billion to just over £21 billion. Much of this spending was on Housing Benefit for social rents. However, increasing reliance on the private rented sector to house low-income households has also meant increased spending on Housing Benefit through Local Housing Allowance rates. A significant proportion of the overall increased expenditure was on working age households (from £7 billion to more than £14 billion).[8]

In 2010, reducing the Housing Benefit budget was central to a package of welfare changes aimed at reducing public expenditure. Several cuts were introduced from 2011 to 2014. These included the following.

- Restricting Local Housing Allowance to four-bedroom properties.
- Setting weekly Local Housing Allowance caps for each property size.
- Setting Local Housing Allowance rates at the 30th percentile of rents in an area rather than the median.
- Changing the way Local Housing Allowance rates were uprated from being in line with the prices of local rents to uprating annually in line with the Consumer Price Index. And then in 2014 and 2015, rates were simply uprated by one per cent.
- Extending the Shared Accommodation Rate (SAR) to most single people under the age of 35, as opposed to 25.[9]

The Westminster Government intended that these reforms would exert a downward pressure on rents in the private rented sector,[10] but overall rents continued to rise. This caused notable gaps between the maximum amounts Housing Benefit recipients were receiving and market rents.

From April 2011 to 2014, private rents grew on average by 6.8 per cent, whereas Local Housing Allowance rates over the same period increased by 3.2 per cent. This represented a gap of £6.84 per week between Local Housing Allowance rates for renters on Housing Benefit and the 30th percentile market rent levels. Gaps rose to around £100 a week in more expensive areas such as inner London.[11]

The changes to Local Housing Allowance rates also made it harder for people to access homes in the private rented sector. While Local Housing Allowance was set to allow recipients to afford the bottom third of the market, it did not take into account demand for rents at these levels. Households in this bottom 30th percentile are competing with others reliant on Housing Benefit, people in low paid work, and in some areas, with students.

This meant in areas with insufficient supply of affordable accommodation, many renters receiving Housing Benefit were forced to rent accommodation with a gap.[12]

Further reductions were announced by the Westminster Government in 2015. These included a freeze in Local Housing Allowance rates from April 2016 for four years until 2020. This has significantly worsened the gaps faced by tenants between market rents and the maximum amount of Housing Benefit they can receive. As shown in the following section, this has created severe affordability problems for low-income households in the private rented sector.

8 Wilson, W., Barton, C., and Keen, R. (2016) *Housing Benefit measures announced since 2010*. London: House of Commons Library.

9 The principle that young, single people in the private rented sector should have their Housing Benefit limited to an amount in line with rents for shared accommodation was introduced in 1996. It was first known as the Single Room Rent. The principle continued with the introduction of Local Housing Allowance in 2008, as the Shared Accommodation Rate.

10 Department for Work and Pensions (2013) *Housing Benefit Impact Assessment: uprating Local Housing Allowances by CPI from April 2013*. London: Department for Work and Pensions.

11 Shelter (2015) *Cuts and changes to LHA for private renters*. London: Shelter.

12 Shelter (2015) *Cuts and changes to LHA for private renters*. London: Shelter.

Affordability in the private rented sector in 2018

This section outlines the impact of Housing Benefit changes on private rented sector affordability for homeless people and those on low incomes. As discussed in Chapter 11, 'Housing solutions to homelessness', the private rented sector is increasingly relied upon as a solution to homelessness, particularly in England and Wales.

Our 2018 research with the Chartered Institute of Housing (CIH)[13] examined the cumulative effects of Local Housing Allowance changes on the ability of households with low incomes to find and afford private rented sector housing. These households included homeless and previously homeless people.

The research considered private rented sector affordability[14] for working-age households when not in work, and when in part-time or full-time work at the National Minimum Wage.[15] These households included: single people in shared accommodation; couples without children in one-bedroom accommodation; and small families with up to two children in two-bedroom accommodation.

We looked at affordability for households not in work to understand whether Local Housing Allowance rates are keeping up with private rents. This affects whether homeless households not in work can find stable housing.

We also looked at households in work to compare where the private rented sector was affordable with earned income. We wanted to understand how financially stable these households were and the impact of these levels of earnings on homelessness risk. So we looked at whether the private rented sector was affordable when working households aimed to have enough money left, after paying their rent, for essentials such as bills, food, and clothes.

We did this by comparing private rented sector affordability for households in work in three different situations. These were:

- living off the same weekly budget, after paying rent, as a household not in work; this household would have the highest homelessness risk[16]

13 Crisis and CIH (publication forthcoming).

14 Rental data from the Valuation Office Agency in England, the Rent Service Scotland, and Rent Officers Wales was used to calculate rental percentiles in the private rented sector to determine affordability.

15 Full-time work is defined as 37.5 hours a week, and part-time is defined as 16 hours a week. Earning at the National Minimum Wage was chosen as Crisis analysis of the Poverty and Social Exclusion survey (2012) found that households with experience of homelessness had an average income similar to working full-time at the National Minimum Wage. This wage level also reflects the rising trend of low paid, insecure work that is available to many low-income households. We use the term National Minimum Wage to describe Westminster Government's National Living Wage/National Minimum Wage Framework.

16 Benefits support is withdrawn as earnings increase. This means that the benefit system sets an amount that recipients are expected to be able to live off, before they are able to earn income. This amount is consistently lower than the UK poverty line and the lowest amount considered in this research for a household to live off. These households would have a high risk of homelessness as they have so little to cover the cost of essentials.

- living off a weekly budget, after paying rent, that meant the household was living at the UK poverty line; this household would have fairly high homelessness risk[17]

- living off a weekly budget, after paying rent, that meant the household was living at the Joseph Rowntree Foundation's Minimum Income Standard. This household would have reduced homelessness risk.[18]

Households not in work

There are significant geographical differences between England, Scotland, and Wales regarding gaps between Local Housing Allowance rates and rental costs at the 30th percentile of the private rented sector. Such differences clearly affect whether homeless people not in work can afford housing.

Broadly, there is little affordability within Local Housing Allowance rates in the private rented sector across most of England. In Scotland, there are areas where affordability within Local Housing Allowance rates is a significant challenge. In Wales, there are more options within Local Housing Allowance rates, assuming no issues with the amount of accommodation available.[19]

In England, the effect of the reductions to Local Housing Allowance rates means very little of the private rented sector is affordable within the current rates. This is even in regions where housing is typically more affordable.

Initially, the effect of the reductions was severe in London and the South East; here, households looking to rent within Local Housing Allowance rates were struggling most. As the reductions continued, this severity expanded to include significant parts of the East of England and the South West. The research for 2018 shows us that now, households will struggle to afford housing within Local Housing Allowance rates in all regions in England. The exceptions are: the North East, half of the areas in the North West, and a couple of areas in the South West of England.

Figure 10.1 shows that in England, London and the South East continue to be the regions where finding housing within Local Housing Allowance rates is hardest. For example, in the most optimistic situation for couples needing a one-bedroom property in London, they would be able to afford seven per cent of the private rented sector in places like Putney or Fulham. And looking in the South East, only 15 per cent of private rented sector properties in Canterbury would be affordable within the rates.

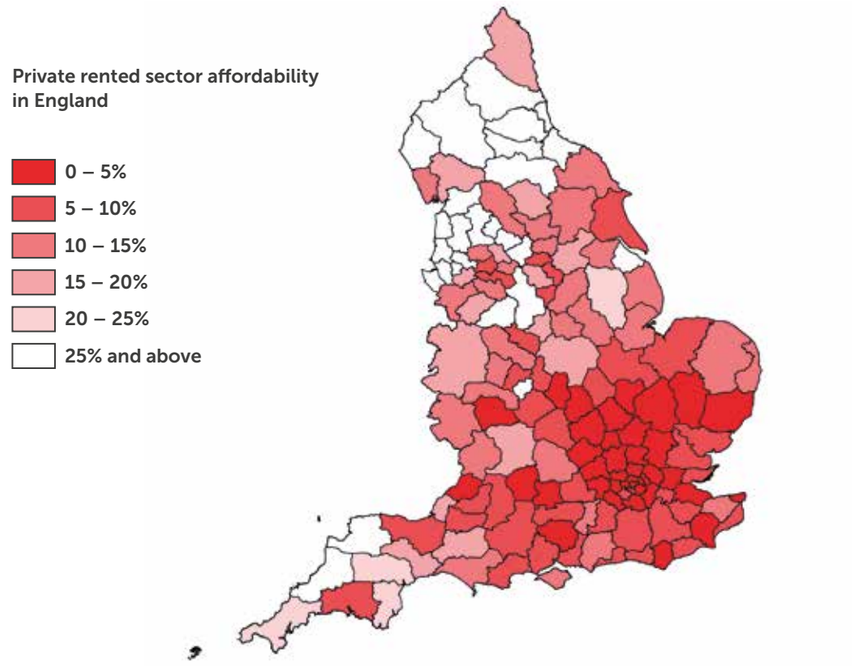
However, similar pressures are also evident in more affordable regions, such as Yorkshire and the Humber. Couples or single people aged 35 and over will find that in three quarters (75%) of areas, less than 18 per cent of the private rented sector will be affordable. Until this year, more than 20 per cent of the private rented sector was affordable within Local Housing Allowance rates in almost all areas in Yorkshire and the Humber. The ongoing effects of the reductions mean this is no longer true.

17 The poverty line was chosen as a benchmark for households at a fairly high risk of homelessness due to strong evidence of the centrality of poverty to homelessness.

18 The income levels given in the Joseph Rowntree Foundation's Minimum Income Standard mean the chances for households to be behind on bills or go into rent arrears are substantially lower compared to households measured as living in relative poverty. Households living at these levels are therefore considered to experience reduced financial vulnerability and homelessness risk. Full details of the methodology are set out in a Crisis and CIH briefing (publication forthcoming).

19 The amount of accommodation available can present a significant challenge in Wales, and particularly in rural areas. This is discussed in more depth in Chapter 11.

Figure 10.1 Private rented sector affordability in England within one-bedroom Local Housing Allowance rates for 2018/19



Source: Crisis and CIH analysis using Valuation Office Agency data.

Overall, for one-bedroom properties, 20 per cent or more of the private rented sector is affordable within Local Housing Allowance rates in just 29 of 152 areas in England.

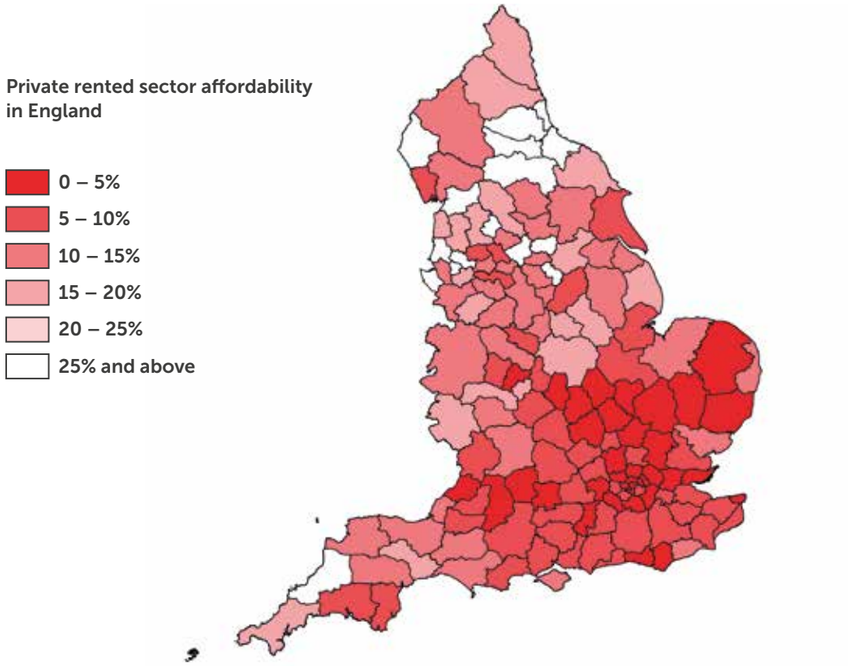
The picture is even more difficult for small families looking to rent two-bedroom properties, as shown in figure 10.2. Twenty per cent or more of the private rented sector is affordable within Local Housing Allowance rates in just 16 of 152 areas in England.

Of the households considered in this research, small families face the largest gaps between the Local Housing Allowance rate and the 30th percentile of market rents in Great Britain. They face the largest weekly gap in Central London of £213.60. But high weekly gaps are also experienced outside of London – in Bristol (£39.57), South West Hertfordshire (£38.77) and Bath (£34.14).

In Scotland, in almost half of areas (eight out of 18), less than 20 per cent of the private rented sector is affordable within Local Housing Allowance rates for one-bedroom properties. Small families needing two-bedroom properties face the same problem. Figure 10.3 shows that these households will find fewest options in Lothian, Greater Glasgow, and Perth and Kinross.

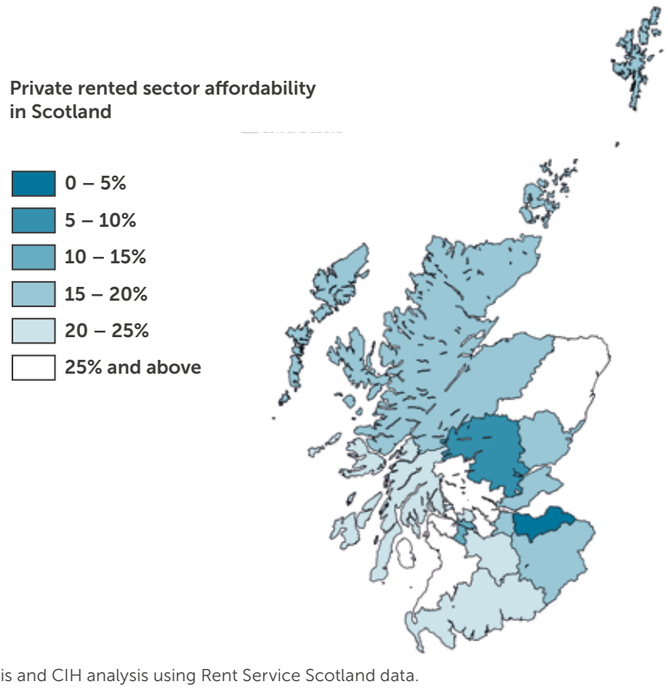
Households struggle in Lothian in particular. Here, just three per cent of the private rented sector is affordable within Local Housing Allowance rates for one-bedroom properties, and seven per cent for two-bedroom properties.

Figure 10.2 Private rented sector affordability in England within two-bedroom Local Housing Allowance rates for 2018/19



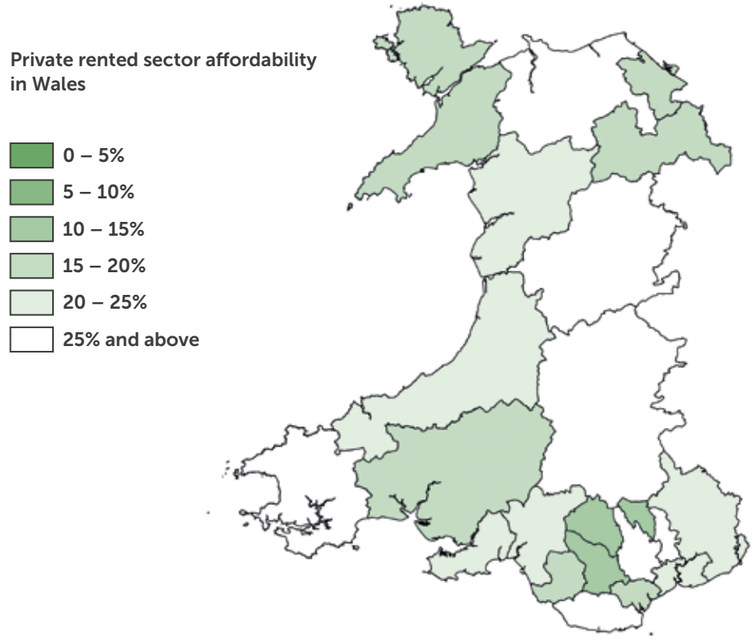
Source: Crisis and CIH analysis using Valuation Office Agency data.

Figure 10.3 Private rented sector affordability in Scotland within one-bedroom Local Housing Allowance rates for 2018/19



Source: Crisis and CIH analysis using Rent Service Scotland data.

Figure 10.4 Private rented sector affordability in Wales within one-bedroom Local Housing Allowance rates for 2018/19



Source: Crisis and CIH analysis using Rent Officers Wales data.

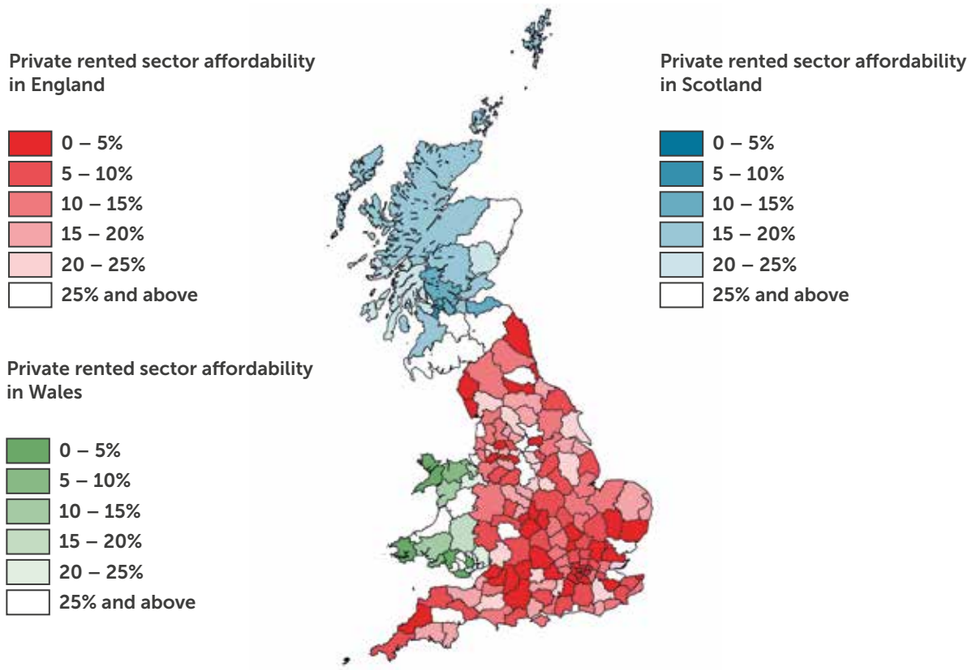
In Wales, the picture is more variable. Figure 10.4 shows that there are 'hotspot' areas where affordability is a challenge. People needing one-bedroom properties will find affordability a challenge in just under a third of areas (seven out of 22). However, in the same number of areas, more than 25 per cent of the private rented sector is affordable within Local Housing Allowance rates. In most of Wales, affordability of the private rented sector falls between 20 and 25 per cent.

Affordability also improves for small families in Wales. The Local Housing Allowance rate for two-bedroom accommodation covers at least 25 per cent of the private rented sector in just under half of areas (ten out of 22). However, it is challenging for small families who need accommodation, particularly in Cardiff, Vale of Glamorgan, Ceredigion, and North West Wales. Small families face the largest gaps in Wales in these areas compared to other households considered.

In all three countries, people under 35 who receive the SAR will struggle more to find affordable housing compared to other households. Figure 10.5 shows the scale of the issue. In England, less than 20 per cent of the private rented sector is affordable within the SAR in 123 of 152 areas (81% of the private rented sector). In Scotland, less than 20 per cent is affordable within the SAR in ten of 18 areas (55%). In Wales, this is true in 11 of 22 areas (50%).

In England, the severity of affordability within the SAR is greater than for one-bedroom and two-bedroom properties. In more than a quarter (27%) of areas, five per cent or less of the private rented sector is affordable.

Figure 10.5 Private rented sector affordability in Great Britain within Shared Accommodation Rates for 2018/19



Source: Crisis and CIH analysis using Valuation Office Agency data, Rent Service Scotland data, and Rent Officers Wales data.

This includes 12 areas where there is no shared accommodation affordable within the SAR. This compares to one area for both one-bedroom and two-bedroom properties where there is no accommodation affordable within Local Housing Allowance rates.

In Scotland, affordability within the SAR is also severe in more areas, such as North Lanarkshire, compared to one-bedroom and two-bedroom properties. In Wales, the SAR is the only rate for which less than ten per cent of the private rented sector is affordable. In Caerphilly and the Vale of Glamorgan, there is no shared accommodation affordable within the SAR.

Gaps in the SAR are likely to be more serious as young people receive lower amounts of overall benefits and so are less likely to be able to make up the gaps from other benefit income. The standard amount of support for non-housing costs in Universal Credit for someone aged under 25 is £251.77 a month, compared to £317.82 for someone over 25. Consequently, even gaps of £5 a week are difficult to manage.

Households in work

Most homeless people (88%) want to work, either now or in the future.[20] Research with formerly homeless people shows that employment is 'the most important factor in terms of enhancing their quality of life and providing hope for the future.'[21] Employment can be an effective route out of homelessness. It can help increase financial, and therefore housing, stability.

However, the research shows that when homeless households move into, or are in, employment, they must still manage low budgets because housing costs take up a large proportion of income. Affordability once more becomes an issue and is a barrier to resolving homelessness, or increases the likelihood of repeat homelessness.

This is particularly true in areas where housing is more expensive. Here, households have two options. They can spend less on rent if they can find affordable accommodation, meaning they have more money left over to pay bills, and buy food and clothes. However, affordable accommodation is often linked to poorer conditions and less security in the private rented sector, as discussed in Chapter 11. Alternatively, they can spend more on rent to increase the proportion of properties affordable to them in the private rented sector. But this means they have little left over to cover spending on essentials such as bills and food.

So, even when in work, homeless households are often unable to increase their standard of living to a level where they are at a reduced risk of homelessness. As mentioned, our research with the CIH defines this level as the Joseph Rowntree Foundation's Minimum Income Standard.

The research shows that living at the Minimum Income Standard is only possible for single people aged 21 and over that work full time, and couples aged 25 and over where both adults are working. This is due to a combination of higher levels of earnings with age,[22] and lower housing costs for younger people from shared accommodation.

Figure 10.6 shows that for these households, being able to live at a reduced risk of homelessness is more likely in areas where housing is generally more affordable. In England, this means that these households are unlikely to be able to live at a reduced risk of homelessness in London, the South East, the East of England, and in 'hotspots' in the South West. In the West Midlands, younger households (aged 21-24) will struggle to secure housing in the private rented sector due to lower National Minimum Wage amounts.

These trends are also seen in Scotland and Wales. Compared to England, rents in these countries are generally lower. This means that on the whole, there is a greater chance for these households to live at a reduced risk of homelessness. However, younger people aged 21-24 will struggle to afford the private rented sector in certain parts of these countries.

In Scotland, they will struggle in Lothian, Aberdeen and Shire, Greater Glasgow, and East Dunbartonshire. In Wales, they will struggle in Flintshire and Caerphilly.

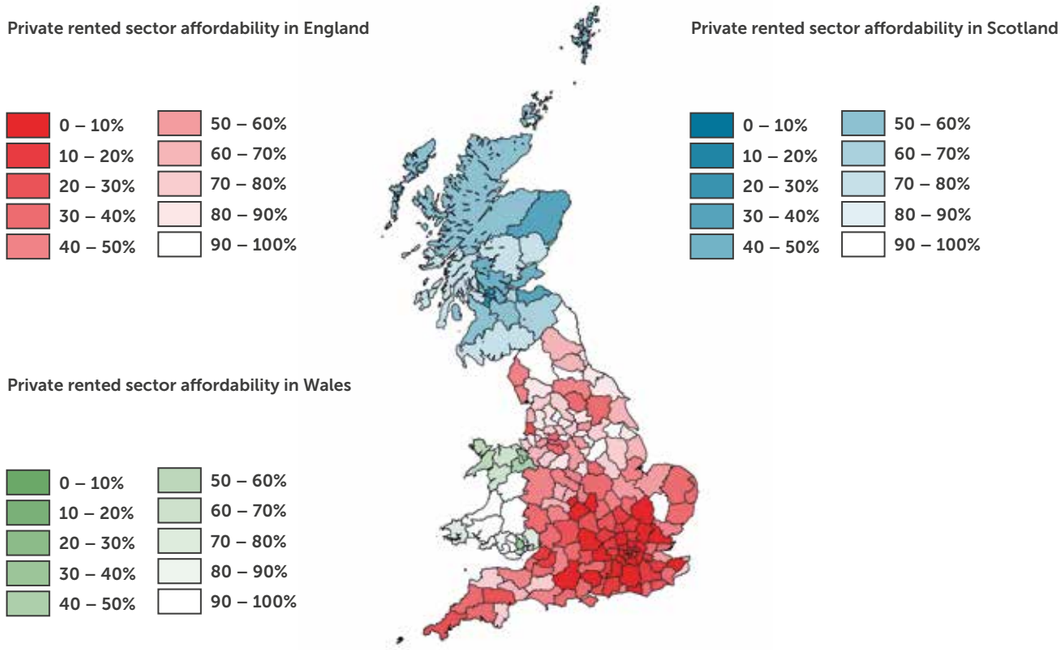
Significantly, most households in the research are unable to reach the Minimum Income Standard and so live at risk of homelessness when in work. This risk is much higher in areas of more expensive housing across Great Britain.

These households can sometimes live at the UK poverty line in areas where there is more affordable housing. However, poverty is central to homelessness.[23] So even though a household may initially be able to afford the private rented sector, they

20 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L, Reeve, K. (2015) *Homeless people's experience of welfare conditionality and benefit sanctions.* London: Crisis.
21 Crane, M., Joly, L, Manthorpe, J. (2016) *Rebuilding Lives: Formerly homeless people's experience of independent living and their longer-term outcomes.* London: Kings College London.

22 The National Minimum Wage increases by age. People aged 18-20 receive a much lower National Minimum Wage, and those aged 21-24 receive a lower National Minimum Wage than those aged 25 and over.
23 Bramley, G. and Fitzpatrick, S. (2018) 'Homelessness in the UK: who is most at risk?', *Housing Studies Journal*, Volume 22, Issue 1, pages 96 – 116. https://www.tandfonline.com/doi/ref/10.1080/02673037.2017.1344957?scroll=top.; Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain.*

Figure 10.6 Private rented sector affordability in Great Britain for single adults aged 21 - 24 working full time and living at the Minimum Income Standard



Source: Crisis and CIH analysis using Valuation Office Agency data, Rent Service Scotland data, and Rent Officers Wales data.

risk becoming homeless again if the pressure of low incomes and high housing costs becomes too much.

The groups most at risk of homelessness are: young people aged 18-20 due to the lower National Minimum Wage, couples where there is only one earner, and households in work part time. Though this research did not explicitly examine the impact of childcare for small families, it suggests families that have to face childcare costs will also struggle significantly. This means single parents in particular have a high homelessness risk.

In many parts of Great Britain, the only option for these households is to live off a similar weekly budget as households not in work to increase their ability to rent a suitable and secure home. This leaves them at a high risk of homelessness, despite working.

These findings highlight the importance of the role of employment support for homeless people and people at risk of homelessness. Clearly, the employment opportunities that homeless people aspire to should be tackled alongside affordable housing solutions. These solutions should be both in the private rented sector as set out later in this chapter, and in the social sector, as discussed in Chapter 11. This is crucial to ensuring homeless people and people at risk of homelessness can become financially stable by entering sustainable employment that covers the cost of their housing.

London: Crisis.

10.3 Housing Benefit

Support from Universal Credit to stabilise housing is vital for people who want to leave homelessness behind. It is also a financial safety net preventing low-income households from becoming homeless in the first place.

To successfully stabilise housing for these groups, investment is needed in Universal Credit to ensure it covers the cost of housing.

In the consultation to inform this plan, people with lived experience of homelessness strongly emphasised the importance of having a benefits system that provides an adequate safety net.[24] This is essential to prevent people from becoming homeless if they experience a period of unemployment or unstable employment. People increasingly felt that the benefits system is no longer providing a sufficient safety net.

"The benefits system doesn't accurately reflect the real cost of living, it doesn't cover rent."

(Consultation participant, Croydon)

Local Housing Allowance covering the cost of rent

Problem

The Local Housing Allowance rate reductions have made renting completely unaffordable for homeless people in many areas of Great Britain. Many households are now in a position where they have few, or no, options to be able to manage the gap between their rent and their Housing Benefit. This means the private rented sector is increasingly unviable as a solution to homelessness. This is particularly concerning in the context of a shortage of affordable housing for low income households across Great Britain.

Until this year, the reductions meant that affordability of private rents within Local Housing Allowance rates followed a noticeable geographical pattern. The pattern reflected the affordability of rents from when the uprating was first changed from local rents to a flat rate.

It meant that generally, areas characterised by lower rental growth remained affordable, and those characterised by higher rental growth were increasingly unaffordable. The impact meant reductions fell hardest on Housing Benefit recipients living in expensive areas, where demand for housing was also highest.

Consequently, in more expensive areas, households were forced to mitigate the problems caused by significant gaps by moving to areas where housing was more affordable. For example, from 2010 to 2014, there were significant movements of Local Housing Allowance recipients from inner London boroughs to local authorities in the South East and East of England.[25]

This increased the geographical concentration of more disadvantaged households, but also restricted opportunity for households forced to move further from employment opportunities. The Department for Work and Pensions (DWP) recognised that this movement increased the risk of homelessness for these households.[26]

However, as our research shows, these geographical patterns are diminishing rapidly. In England, there are very few options left in terms of market rents within Local Housing Allowance rates. In Scotland and Wales, while options remain, they can be at odds with the amount of housing available.

24 Crisis, Groundswell and Uscreates (2018) *The lived experience of homelessness.* London: Crisis.
25 National Audit Office (2017) *Homelessness.* London: National Audit Office.
26 National Audit Office (2017) *Homelessness.* London: National Audit Office.

Households are therefore facing fewer areas where housing is affordable within Local Housing Allowance rates. For homeless households, this makes living in the private rented sector extremely difficult. For households at risk of homelessness in the private rented sector, it means they have to find ways to overcome the gaps or face eviction.

Evidence suggests that to date, households have already tried to overcome gaps and avoid eviction. An evaluation of the effects of the first set of reductions to Local Housing Allowance rates, before the freeze, found tenants were forced to cut back on expenditure on household essentials or borrow money from family or friends.[27] Where they were unable to do this, there was a rise in arrears. A 2014 survey of landlords found that 37 per cent had evicted, not renewed or ended tenancies of Local Housing Allowance tenants since April 2011.[28]

The Westminster Government has tried to mitigate the impact of Local Housing Allowance reductions through Targeted Affordability Funding.

Targeted Affordability Funding is a portion of the savings made by the Westminster Government through the changes to uprating since 2014. The funding is used to uplift Local Housing Allowance rates. This is usually by three per cent in areas where less than five per cent of the private rented sector is affordable within Local Housing Allowance rates.[29]

In 2017/18, 30 per cent of the savings from the freeze were used for Targeted Affordability Funding. In the 2017 autumn budget, the Westminster Government increased the portion of savings from the freeze to be used for Targeted Affordability Funding to 50 per cent. This has resulted in Targeted Affordability Funding of an additional £125 million being allocated over two years (2018/19 and 2019/20).

Targeted Affordability Funding allocation is decided by 'ranking all 960 Local Housing Allowance rates in Great Britain according to the private rental market share they can afford in each area according to latest available rent officer data'.[30]

However, the funding has largely failed to address the gaps between Local Housing Allowance rates and market rents, despite the intention to do so.[31]

The higher level of Targeted Affordability Funding for 2018/19 was principally allocated in England.[32] An analysis of the SAR, one-bedroom, and two-bedroom rates for this year shows that 30 per cent of these rates received Targeted Affordability Funding. However, in 74 per cent of areas (103 out of 138) where Targeted Affordability Funding was allocated, five per cent or less of the private rented sector is affordable within the uplifted Local Housing Allowance rate.

This is because allocating Targeted Affordability Funding where the private rented sector is least affordable means it tends to go to areas where rents have been growing fastest. This means it will not completely make up the gaps; it will only reduce the amount of the gap depending on how fast rents grow.

As the reductions in Local Housing Allowance are now at a stage where they are significant in much of Great Britain, Targeted Affordability Funding is an ineffective solution.

With Local Housing Allowance gaps increasing year on year and creating significant affordability problems in more areas, there is an increased likelihood of evictions and consequently, homelessness. This is particularly true in England, where the ending of an Assured Shorthold Tenancy is the single biggest cause of homelessness.[33] It has already accounted for 78 per cent of the rise in homelessness from 2011 to 2017.[34]

Solution

Returning Local Housing Allowance to the 30th percentile is urgently required to redress homelessness. While this will require significant upfront cost, it will prevent households at risk of homelessness from becoming homeless. It will also support homeless households to resolve their homelessness in the private rented sector.

The affordability research[35] shows that the areas of Great Britain that offer more affordable housing are characterised by lower rental market growth. This means gaps between current Local Housing Allowance rates and the 30th percentile remain low.

For example, a small family needing to live in a two-bedroom property in East Lancashire in England would find they can afford just 17 per cent of the private rented sector. This is assuming properties are available. Yet an increase of around £1.15 per week would mean the family could afford 30 per cent of the private rented sector.

However, areas where rents are more expensive face large gaps. This makes it difficult for low-income households to find housing in a larger proportion of the private rented sector.

If someone wanted to rent a one-bedroom property in Bath they would find that the Local Housing Allowance rate covers properties in just seven per cent of the private rented sector. To increase the properties available to 30 per cent of the private rented sector means covering a weekly gap of £27.04.

Similarly, looking for a one-bedroom property in Scotland would mean the Local Housing Allowance rate in Lothian covers just three per cent of the private rented sector. An extra £20.22 a week is needed to afford properties at the 30th percentile. Conversely, in Dundee and Angus 19 per cent of the private rented sector would be affordable. Just an extra £1.31 would be needed to look for properties at the 30th percentile.

In more affordable areas, restoring Local Housing Allowance rates to the 30th percentile would not increase levels of benefit entitlement significantly. And so it is unlikely that restoring Local Housing Allowance to the 30th percentile will prompt landlords to increase rents in the bottom third of the market in these areas.

If the Westminster Government uses Targeted Affordability Funding to address concerns with Local Housing Allowance, then **at a minimum Targeted Affordability Funding should be better allocated.** This means bringing Local Housing Allowance rates back in line with market rents where it is needed most.

27 Department for Work and Pensions (2015) *The impact of recent reforms to Local Housing Allowances: Summary of key findings*. London: The Department for Work and Pensions.

28 Department for Work and Pensions (2015) *The impact of recent reforms to Local Housing Allowances: Summary of key findings*. London: The Department for Work and Pensions.

29 Wilson, W., Barton, C. (2017) *Local Housing Allowance caps and the social rented sector.* London: House of Commons Library.

30 Wilson, W., Barton, C. (2017) *Local Housing Allowance caps and the social rented sector.* London: House of Commons Library.

31 CIH (publication forthcoming)

32 The affordability challenge in the private rented sector is more significant in England compared to Scotland and Wales, partially because England is divided into more areas for setting Local Housing Allowance rates. As the method to allocate Targeted Affordability Funding means the funding goes where affordability is most severe across Britain, England receives the bulk of the funding.

33 National Audit Office (2017) *Homelessness*. London: National Audit Office

34 Shelter (2017) *Press release: Eviction from a private tenancy accounts for 78% of the rise in homelessness since 2011*. https://england.shelter.org.uk/media/press_releases/articles/eviction_from_a_private_tenancy_accounts_for_78_of_the_rise_in_homelessness_since_2011

35 Crisis and CIH (publication forthcoming)

To ensure this targets homelessness, the funding should be allocated taking the following into account.

1. *Reach:* the current method of allocating Targeted Affordability Funding means the affordability pressures in Scotland and Wales are largely ignored given the scale of the problem in England. Targeted Affordability Funding should be calculated separately for England, Scotland, and Wales.

2. *Homelessness prevention and alleviation:* levels of homelessness within an area can be a strong indication of housing affordability and accessibility issues. Using current data, the numbers of people rough sleeping in an area, and the number of people in unsuitable temporary accommodation should be considered when allocating Targeted Affordability Funding.

3. *Affordability:* the proportion of the market with the greatest affordability problems should be prioritised as currently. However, this could be defined as affordability below 15 per cent – half of the 30th percentile which Local Housing Allowance rates are meant to cover.

4. *Demand:* Housing Benefit caseload in an area should be taken into account so that Targeted Affordability Funding can have the greatest impact where there is high need.

Where Targeted Affordability Funding is most needed, the Local Housing Allowance rate should be lifted to the 30th percentile immediately. This will require funding beyond what is currently allocated until 2019/2020. So the Westminster Government should increase funding for Targeted Affordability Funding to appropriate levels if this approach is taken.

Impact
Increasing the proportion of the private rented sector that can be covered by Housing Benefit is essential. This is both to resolve homelessness and to ensure the private rented sector is a secure option for low-income households. This analysis suggests that on the whole, restoring Local Housing Allowance rates to the 30th percentile would close large gaps between Local Housing Allowance rates and rents in expensive areas. This would make it simpler and more affordable for homeless people to find housing.

The Westminster Government should align all Local Housing Allowance rates to the 30th percentile immediately, allowing for legislative change.

If using Targeted Affordability Funding, then Local Housing Allowance rates should be aligned to the 30th percentile by the end of the freeze in 2020.

Responsibility for change
This approach requires data sharing and the DWP, the Ministry of Housing, Communities, and Local Government (MHCLG), and HM Treasury working closely together. Close working with the Scottish and Welsh Governments, the Valuation Office Agency in England, the Rent Service Scotland, and Rent Officers Wales is also essential.

Sustaining Local Housing Allowance to meet the cost of rent

Problem
The reductions to Local Housing Allowance from the 30th percentile happened through changes to the way Housing Benefit was uprated. If the Westminster Government restores Local Housing Allowance to the 30th percentile, as strongly recommended, this solution must remain sustainable. This can only be achieved by uprating Local Housing Allowance by an appropriate mechanism that reflects how private rents change.

As mentioned, the initial method of uprating was switched from a calculation using local rents to using the Consumer Price Index. This was then limited to a one per cent increase and finally frozen with no uprating altogether. This meant that the reduction from the 30th percentile happened in an unequal way across Great Britain. This is because real rent increases do not follow this flat rate.[36]

The Consumer Price Index is only very weakly correlated with rent prices. Analysis from the CIH[37] shows that if this had been used to uprate Local Housing Allowance since 2013, the affordability of the private rented sector would be similar to what it is now. This means that if the Consumer Price Index is used for uprating when the freeze on Local Housing Allowance ends in 2020, it will not be enough. Analysis by the Institute of Fiscal Studies has also found that it would result in a further 200,000 people facing a gap between their rent and Housing Benefit entitlement by 2025.[38]

Not only will uprating by the Consumer Price Index see more households facing financial gaps, it will also entrench geographical divergences in affordability across Great Britain. In areas of high rental growth, rents will rise faster than the Consumer Price Index and reduce the proportion of the market covered by Local Housing Allowance rates. But in areas of little to no rental growth, Local Housing Allowance rates will be inflated as they increase at a level above local rent growth.

This means areas with expensive housing will remain unaffordable for low-income households, whereas those with cheaper housing will become increasingly affordable.

Solution
To retain the link with local rents, the Westminster Government should uprate Local Housing Allowance rates annually in line with projected growth of rents. An average calculated over a maximum of five years is suggested.

Such an approach would create a smoothing effect, so that an average rate balances out annual volatility in local rents.

Impact
Analysis by the CIH suggests that taking an approach based on an average of a measure results in fewer large gaps between market rents and Local Housing Allowance rates.[39] This means over the long term, affordability would not become a particular problem in one area. Their analysis also shows that uprating with a link to actual rent prices is the most effective approach, compared to uprating by the Consumer Price Index which has little relation to rent prices.

Choosing to uprate by a consistent measure should also help provide security to landlords. While rents may outpace Local Housing Allowance rates in a given year, landlords will know how much the Local Housing Allowance rates will be increased by in the next year. This will help with financial planning and management.

Additionally, taking an average of local rents over a number of years will mean the increase is calculated on projected rental growth, rather than past growth. To illustrate, the increase for 2011/12 was based on rental growth over 2010/11. This meant Local Housing Allowance rates inevitably fell behind the 30th percentile in areas of high rental growth. Using projected rental growth will reduce this initial error and make Local Housing Allowance rates

36 Adam, S., Browne, J. and Joyce, R. (2013) *Submission to the Work and Pensions Committee's enquiry on support for housing costs in the reformed welfare system*. London: Institute for Fiscal Studies.
37 CIH (forthcoming)
38 Joyce, R., Mitchell, M. and Norris Keiller, A. (2017) *The cost of housing for low income renters*. London: Institute for Fiscal Studies.
39 CIH (publication forthcoming)

more accurate, again providing more security to landlords.

This method for uprating must be implemented by the end of the freeze of Local Housing Allowance rates in 2020 at the latest.

Responsibility for change
The DWP and HM Treasury.

Setting Local Housing Allowance rates

Problem
The method for setting Local Housing Allowance rates has also contributed to some of the gaps experienced by Housing Benefit recipients. Though not restricted to it, this is a problem that is most apparent for the SAR.[40]

Local Housing Allowance rates are based on the entirety of rents that can be collected by rent officers, rather than statistically robust samples. In some areas, the SAR levels have been based on very small samples and are unlikely to reflect the reality of rents for shared accommodation.

In England, the Valuation Office Agency can base its calculations on a limited sample of properties. In 2012/13 the Valuation Office Agency on average based its calculations on the SAR on 102 fewer properties per postcode than advertised on the website spareroom.co.uk. Consequently, it calculated the average weekly rent to be £23.95 lower.[41]

In their 2018 data, the 30th percentile is based on a significantly smaller number of rents compared to last year in some areas. For example, in Bolton and Bury the 30th percentile has been calculated using 39 shared accommodation rents, compared to 205 in 2017. This makes any calculation for 2018 much more volatile than last year, including knowing the accuracy of Local Housing Allowance rates in relation to the market.

This volatility in sampling is due to the fact that rent officers in England, Scotland, and Wales are reliant on landlords voluntarily submitting their rental data to be used. There is no legal obligation in any of the three countries for landlords to submit their rental data to the relevant agencies. This means that Local Housing Allowance rates are based on the capacity of landlords to submit rental data, and their relationship with rent officers. There is currently no way to ensure robust data to track the market, or to use in setting rates.

The impact of this flawed sampling has been reflected in analysis of Local Housing Allowance by the DWP. In 2010, the proportion of SAR cases experiencing gaps was higher than for all recipients, at 67 per cent compared to 49 per cent.[42]

The core concern is that given the SAR is so out of step with rents for shared accommodation, this creates an additional barrier for landlords to let to young Housing Benefit recipients. Our research confirmed these concerns for young people who need the SAR to afford housing. Across three locations, 13 per cent of advertised properties were affordable with the SAR. When accounting for the proportion of landlords willing to let to Housing Benefit recipients, just 1.5 per cent (66 of the 4,360 shared properties advertised) were accessible to SAR recipients.[43]

40 Department for Work and Pensions (2011) *Two Year Review of the Local Housing Allowance*. London: Department for Work and Pensions.
41 Ashworth, A. (2015) *Shut Out briefing: young people, shared acommodation, and homelessness*. London: Crisis.
42 Department for Work and Pensions (2011) *Two Year Review of the Local Housing Allowance*. London: Department for Work and Pensions.
43 Teixeira, L. and Sanders, B. (2012) *No Room Available: a study of the availability of shared accommodation*. London: Crisis.

Issues with the volatility of the SAR have been identified in Scotland and Wales where supply issues of shared accommodation, especially in rural areas, are well-known. This method of collecting rates therefore further worsens issues created by a shortage of supply. Overall, the SAR is considered to undermine the ability of Housing Options teams to use the private rented sector to prevent or resolve homelessness.[44]

Solution
For Local Housing Allowance rates to be accurate, landlords should be required to submit annual data on the size of their rental property, and the level of rent they are charging.

This data should be shared with Rent Officers Wales, the Valuation Office Agency in England, and Rent Service Scotland, to support with Local Housing Allowance rate setting.
The data could be collected as part of national landlord registration schemes, and require landlords to specify if they rent to Housing Benefit tenants.[45] These already exist in Scotland and Wales, and have been recommended for England in Chapter 11.

Impact
This will increase the volume of data available to set Local Housing Allowance rates. It could potentially mean that there will be high enough volumes of data to be able to set minimum sample sizes for each area for Local Housing Allowance rates, even excluding rents for Housing Benefit tenants. This will improve how robust the data is, and the accuracy of Local Housing Allowance rates.

44 Fitzpatrick S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. (2015) *The homelessness monitor: Scotland 2015*. Edinburgh: Crisis; Community Housing Cymru (2017) *Postcode lottery: the impact of applying the Local Housing Allowance to general needs social housing tenants in Wales*. Cardiff: Community Housing Cymru.
45 Currently, data from landlords that rent to Housing Benefit tenants is excluded when determining the 30th percentile and setting Local Housing Allowance rates. This is to ensure that landlords do not inflate rates for their own benefit.

The data collection would have similar timelines to implementing a national registration scheme in England (see Chapter 11), as it should be incorporated into the design of the scheme. Agencies in Scotland and Wales would need to work to similar timescales to secure data sharing protocols.

Responsibility for change
The MHCLG would be responsible for setting up a landlord registration scheme in England. MHCLG, the Welsh Government and the Scottish Government, need to work respectively with the Valuation Office Agency, Rent Officers Wales, and Rent Service Scotland on data sharing.

Shared Accommodation Rate

Problem
The SAR requires Universal Credit recipients under 35 to live in shared housing. This is often not appropriate for homeless people or those at high risk of becoming homeless.

Concerns about the suitability of sharing as an option have long been raised in relation to the SAR.[46] From 2011 to 2014, there was a 13 per cent drop in single 25-34 year olds claiming Housing Benefit. This is despite the overall number of people claiming Housing Benefit continuing to rise. This drop was particularly significant in central London, where the Housing Benefit caseload fell by 39 per cent.[47]

Landlords and housing advisors interviewed for government research suspected young people were being forced into sofa surfing or rough sleeping after struggling to find shared accommodation within the SAR.[48] In London over this period, there was a 19 per cent increase in the number of rough sleepers aged between 26 and 35.[49]

The Westminster Government has put exemptions in place for some groups that would find shared accommodation difficult,[50] but these are insufficient. The Westminster Government rationale for the SAR is to 'ensure that Housing Benefit rules reflect the housing expectations of people of a similar age not on benefits'.[51] However, there are some vulnerable groups that are not covered by SAR exemptions, or they may be only covered up to a certain age. This means the current exemptions do not protect young people where it is inappropriate to place expectations of being able to live in shared accommodation.

For example, the All Party Parliamentary Group on Ending Homelessness (APPGEH) report into groups at high risk of homelessness found that care leavers have often endured challenging upbringings and trauma. Care leavers told the inquiry they would feel unsafe in a shared home, and that the current exemption up to the age of 22 is not adequate to ease the transition into adulthood.[52]

46 Wilson, W. (2014) *Housing Benefit: Shared Accommodation Rate*. London: House of Commons Library.
47 Department for Work and Pensions (2015) *The impact of recent reforms to Local Housing Allowances: Summary of key findings*. London: Department for Work and Pensions.
48 Department for Work and Pensions (2015) *The impact of recent reforms to Local Housing Allowances: Summary of key findings*. London: Department for Work and Pensions.
49 Ashworth, A. (2015) *Shut Out briefing: young people, shared acommodation, and homelessness*. London: Crisis.
50 Including: social tenants; tenants in certain supported accommodation; and tenants with disability-related or care-related needs. With the extension of the SAR to under-35s, the government also included exemptions for: ex-offenders subject to management by more than one agency under the Multi Agency Public Protection Arrangements (MAPPA) and the equivalent in Scotland; and for people who have spent three months or more in a hostel.
51 Wilson, W. (2014) *Housing Benefit: Shared Accommodation Rate*. London: House of Commons Library.
52 Greaves, R. (2017) *Homelessness prevention for care leavers, prison leavers, and survivors of domestic violence*. London: Crisis.

Similarly, survivors of domestic abuse, who are a group at high risk of homelessness, do not qualify for specific exemptions under the SAR. But it is not appropriate to require these survivors, after fleeing an abusive partner, to share with strangers.

Solution
All homeless people or people at risk of homelessness for whom sharing is not appropriate should be exempt from the SAR.

There are groups that have a high risk of becoming homeless and for whom sharing is likely to be inappropriate.

The current list of SAR exemptions should be expanded to cover people who are homeless or at high risk of homelessness, where sharing is not appropriate.

Through the *Keep on Caring Strategy* of 2016, the Westminster Government recognised that the exemption to the SAR for care leavers only until the age of 22 may not be sufficient. It stated its intent to review 'the case to extend the exemption to the SAR of housing support within Universal Credit, for care leavers to age 25'.[53]

The Westminster Government should extend the current exemptions to up to the age of 35; when someone is eligible for the SAR. The government should also extend this exemption for the following people.

- **People made a Housing First offer** (see chapter 9, 'The role of Housing First in ending homelessness').
- **All care leavers.**
- **People fleeing domestic abuse.**
- **Prison leavers moving on from Approved Premises (APs).** APs are primarily a probation supervision resource. The DWP says they do not satisfy the definition of a specialist hostel for the homeless exemption.[54] However, many of the same arguments about safety, stability and security apply to both groups,[55] and prison-leavers continue to be a population at high risk of homelessness.
- **People with experience of homelessness with alcohol and drug dependency issues.** Others in a shared property could put the progress of recovering addicts at risk. Conversely, people with a history of substance abuse may also affect others in a shared property.[56]

Impact
Ensuring SAR exemptions are comprehensive is vital. Comprehensiveness means that vulnerable people under the age of 35 for whom sharing is likely to not be a suitable option avoid being at risk of failing to sustain their tenancy. This will help avoid homelessness or repeat homelessness.

The changes to the exemptions should be implemented as soon as possible, allowing for legislative change.

Responsibility for change
The DWP.

53 UK Government (2016) *Keep On Caring: Supporting Young People from Care to Independence*. London: HM Government.
54 The Department for Work and Pensions (2011) *Universal Credit Policy Briefing Note 12*. http://webarchive.nationalarchives.gov.uk/+/http://www.dwp.gov.uk/docs/ucpbn-11-conditionality-threshold.pdf
55 Greaves, R. (2017) *Homelessness prevention for care leavers, prison leavers, and survivors of domestic violence*. London: Crisis.
56 Ashworth, A. (2015) *Shut Out briefing: young people, shared acommodation, and homelessness*. London: Crisis.

10.4 Making Universal Credit work

For Universal Credit to be an effective tool for responding to, and preventing, homelessness, it needs to function correctly. This was a key theme raised throughout the national consultation undertaken to inform this plan.[57] Below are a number of issues that need to be resolved.

Implementing Universal Credit

Problem

The roll out of Universal Credit has been beset by administrative errors and delays. Implementation issues have meant vulnerable recipients and people with more complex cases have had to wait more than six weeks for their first payment. Many problems have resulted from administrative errors; existing safeguards applied incorrectly or not set up; and recipients receiving contradictory advice from DWP staff.

This has included homeless people being advised incorrectly about Universal Credit and other benefits. This has created long delays where people are left without crucial financial support. The Trussell Trust, a UK charity that runs a network of foodbanks, has reported that there has been a 30 per cent increase in visitors to foodbanks over six months in areas where Universal Credit has been introduced. [58]

Crisis case study

Local Crisis teams in Brent worked with a client requiring support to manage their housing costs. The client asked for their Housing Benefit to be paid directly to their landlord to make it easier for them. The forms to set up the direct payment were completed, signed and posted with proof of posting. However, the first Universal Credit payment was made in full, including Housing Benefit, to the client's account, rather than direct to his landlord. This also happened with the second payment.

A Crisis housing coach called the Universal Credit helpline to follow up the issue and was told they had no record of the request for a direct payment to be set up. The housing coach was successful in following this up, recovering all rent owed, and setting up the direct payment again. However, when the direct payment was made, all the payments to the landlord were incorrect. The Crisis housing coach then had to resolve this issue, which took several weeks. The client was safe from eviction due to constant negotiation and communication between the Crisis housing coach and the landlord.

Front-line staff at Crisis report spending lengthy periods repeatedly calling the DWP service centre to understand a payment or query inaccurate payments owed to homeless clients. They report receiving different information from service centres regarding the same issue, and significant difficulties finding DWP staff with sufficient knowledge of Universal Credit.

In some cases, these issues have led to rent arrears for recipients, which have only been resolved with intensive negotiation between Crisis and landlords to avoid eviction. With more complex cases, Universal Credit delays and disputes over payment amounts have taken months to resolve. Homeless people or those at risk often do not have the resources to be able to withstand these significant delays.

Solution

Errors and delays in processing Universal Credit claims must be resolved.

Resources must match demand as the Universal Credit rollout continues. This should include investment in training and numbers of staff in service centres and the helpline.

DWP service centre staff must be properly trained when new changes to Universal Credit are implemented. This includes comprehensive knowledge of safeguards and flexibilities for recipients such as direct payments to landlords and signposting to local authority Housing Options teams in the cases of homelessness or housing instability.

Resources will be required immediately to keep pace with the rollout of Universal Credit.

Impact

This will reduce administrative errors and delays in processing, helping homeless people to get the crucial support they need.

Responsibility for change

The DWP.

Universal Credit deductions

Problem

The amount of Universal Credit someone receives can be reduced to pay off money owed to the DWP (known as overpayments from previous benefits), and debts and loans from companies. These are called deductions. Deductions are set up by reducing the standard allowance[59] of Universal Credit.

For homeless people, and those at risk of homelessness, current deduction rates can leave them in a challenging financial situation. This adds to the pressure on incomes that leads to homelessness and prevents homeless people from resolving their situation.

There is a five-week minimum wait to receive the first Universal Credit payment. However, those with an existing Housing Benefit claim will have their Housing Benefit extended to cover two weeks of the period while waiting for their first Universal Credit payment.

In the 2017 autumn budget, the Westminster Government announced a package of support to ease financial pressures for Universal Credit recipients. This included changes to advance payments, which are an advance of financial support intended for Universal Credit recipients in financial hardship.

Universal Credit recipients can now receive 100 per cent of their monthly payment under an advance payment, which they can pay back over 12 months. The advance can be made available on the same day if the recipient is in urgent need of financial support.

Homeless people and those at risk of homelessness are extremely likely to need an advance payment. This is because they will not have savings to cover their rent and living costs before they are awarded their first Universal Credit payment. This advance payment will then be deducted from their subsequent Universal Credit payments.

There is an overall cap on deductions under Universal Credit at up to 40 per cent of the standard allowance. The cap does not include previous overpayments, and rent arrears or fuel costs may still be deducted beyond the cap.

There are regulations that set the rate of deductions. Currently the rates for deductions are broadly as follows.

- **Overpayments and advance payments:** between 15-25 per cent. Deductions for advance payments are set at 15 per cent of the Universal Credit standard allowance if there is

57 Hughes, N. (2018) *Have your say policy consultation: summary report*. London: Crisis

58 Trussell Trust (2017) *Foodbank demand soars across the UK*. https://www.trusselltrust.org/2017/11/07/foodbank-demand-soars-across-uk/

59 The standard allowance is the basic amount of Universal Credit someone is entitled to before any additional entitlements, such as support for children or support if you have a disability or health condition.

no earned income, or 25 per cent if there is.

- **Third party deductions:**[60] most will be at five per cent, though rent arrears are between 10-20 per cent of the standard allowance.

However, given that there is a cap of 40 per cent of the monthly standard allowance, there is also scope for these levels of repayments to be exceeded so they reach the cap.[61] Overall, the cap is higher than that for deductions under the previous benefits system, which was 25 per cent.

Experiential evidence from Crisis local services, the homelessness sector, and organisations such as Citizens Advice, show deductions can be automatically made at unsustainable levels for homeless people and those on low incomes. This is particularly the case where recipients are facing more than one deduction. This is also worsened in cases where mistakes have been made in processing Universal Credit claims.

Citizens Advice case study

'This winter a client asked for help because she had £30.24 left for the month after paying her rent and bills. When we called the Universal Credit helpline, we found out that there were deductions for rent arrears, water bills, and an advance payment, a DWP overpayment and Council Tax. It looked like this:

Standard Allowance £317.82
Housing Allowance £395
Deductions £157.58
Total Universal Credit award £555.24

After she has paid her rent (£400), she was left with £155.24. After bills (electricity, gas, TV licence and broadband) she was left with £30.24 for the rest of the month. She was extremely anxious, particularly when we explained that the next few statements were likely to be similar amounts.'[62]

Shelter case studies

Shelter was able to reduce the rent and Council Tax arrears of a client from 40 per cent to ten per cent. However, under Universal Credit, the client's other non-deferrable deductions increased, so they were still left with deductions of 40 per cent from their Universal Credit payment. As a result, the client was left with just £169 per month to live off.

Another client had deductions of 40 per cent of his standard allowance applied. This was due to fines, housing benefit overpayments, and repayment of an advance payment. He was struggling with anxiety and depression and was waiting for a Work Capability Assessment. He had just £3 for his gas and electricity, and would have to borrow from a friend after that. Shelter issued him with food vouchers because he could not manage on the money he had.

Another client had deductions of 46 per cent applied to his Universal Credit personal allowance. This was for three advance payments, which were wrongly granted, and a social fund payment.

Deductions cannot be made to a Universal Credit claim if the person has a sanction applied (see employment support section). When someone has been sanctioned, they can apply for a hardship loan if they do not have enough money. Since last year, homeless people can access hardship loans immediately if they receive a sanction.

This immediate support is welcome. However, hardship payments are also deducted under the 40 per cent cap from Universal Credit once the sanction no longer applies. Over the long term, it can increase pressure on homeless people and people at risk of homelessness, making it difficult for them to find financial security and stability. This affects whether they can avoid, or resolve, homelessness.

Crisis case study

A client recently began receiving their Universal Credit payment again after a period of sanctions. The sanctions were applied as the client struggled to complete work-related activity due to ongoing health problems. Crisis was supporting him during this time to challenge the sanctions.

The client had to take hardship loans to pay for rent and food while he was sanctioned. Once he began receiving his Universal Credit payment again, the loan was deducted at 40 per cent of his personal standard allowance, leaving him with £140 a month to live off. When a Crisis coach queried this with the Universal Credit helpline, he was told that this amount was correct. This amount left him with little more to live off than when he had been sanctioned.

This pressure on incomes from deductions means homeless people and those at risk of homelessness may not have enough money left over to cover bills, food and any amount they need for rent. The pressure can mean people are forced into higher levels of debt to cover these costs.[63] This only worsens their situation, leaving them further from resolving, or avoiding, homelessness.

Solutions

Homeless people should be able to access the equivalent financial support as an advance Universal Credit payment without having to pay it back.

Advance payments were designed as a solution to the initial wait period in Universal Credit. The welcome changes in the 2017 autumn budget to advance payments do not address the fact that for homeless people, paying back an advance payment is likely to be a struggle. This is especially the case where other deductions are being made to their Universal Credit standard allowance, which is likely. Advance payments, which are necessary for homeless people due to the payment cycles in Universal Credit, add pressure to existing low incomes.

To support homeless people in stabilising their housing situation, they should be given the equivalent of an advance payment award without a requirement to pay it back. This will act as targeted support for those who need it to help with a rapid response to homelessness. It will prevent future financial hardship due to deductions and reduce the risk of repeat homelessness.

The Westminster Government could make this support available through a grant for homeless people. This will support the intention of *The Homelessness Reduction Act (2017)* in England, and homelessness prevention under *The Housing (Wales) Act (2014)*. The grant could be allocated by Housing Options teams working jointly with Jobcentre Plus work coaches (as described in the employment section of this chapter). This will mitigate any concern of creating unintended incentives in the benefits system.

60 This includes rent arrears and other housing costs e.g. service charges; gas, electric or water arrears; council bill tax arrears; child support maintenance; some loans; and some fines.

61 Child Poverty Action Group (2016) *Universal Credit Advances*. http://www.cpag.org.uk/content/universal-credit-advances

62 Foley, B. (2017) *Delivering on Universal Credit*. London: Citizens Advice.

63 Homeless Link (2017) *Submission to the Work and Pensions Committee: Universal Credit Inquiry.* London: Homeless Link.

All those identified as homeless or at risk of homelessness should be granted a three-month delay to the start of all their Universal Credit deductions.

DWP guidance states that a three-month delay for deductions for advance payments can be granted 'in exceptional circumstances'[64]. This delay should be applied to all repayments. Homelessness, or the risk of homelessness, should automatically qualify as an 'exceptional circumstance', with the option to 'opt-out' should the person wish to.

This delay will allow Jobcentre Plus work coaches to work with recipients and relevant organisations to stabilise housing. It will also give work coaches time to set the most suitable repayment option that does not leave recipients at future risk of repeat homelessness.

Work coaches will also have to support recipients regarding employment. They may help some people move into employment, or increase their working hours within three months. This will improve their financial security and ability to repay deductions.

Deductions must be set at affordable levels for homeless people and those at risk of homelessness to avoid repeat homelessness or homelessness.

This requires the DWP to allow for the option of deductions to be set at a lower rate than they are currently. There should also be an option for a lower overall cap for deductions for people who are homeless or at risk of homelessness.

This cap could be as low as five per cent for a period of time where even low amounts of deductions will increase the risk of homelessness.

In practice, this requires Jobcentre Plus work coaches to be allowed to be flexible. They could use the options of lower deductions rates and a lower overall cap to tailor repayments to someone's individual circumstances and set an overall cap of all deductions. This would also allow housing associations and landlords to work with DWP to support tenants at risk of homelessness due to deductions.

In a small number of cases, this cap may still not be workable. So, there should also be the flexibility to apply a '£1 per debt' token payment plan, as recommended by debt advice organisations for those with very little available income.[65]

Impact
These changes will ensure homeless people, and those at risk of homelessness, can sustain repayment levels and resolve or prevent homelessness. Creating extra flexibilities, such as an automatic delay to when deductions begin, also enables Jobcentre Plus to support people into work where possible. This will help with setting deductions at a sustainable level.

Implementing these safeguards successfully depends on Jobcentre Plus work coaches recognising and understanding homelessness, and the impact of financial insecurity on housing stability. Recommendations to improve the capacity and ability of work coaches to achieve this way of working are featured in the employment support section of this chapter.

64 Department for Work and Pensions (2018) *Guidance: Universal Credit Advances*. https://www.gov.uk/guidance/universal-credit-advances
65 StepChange (2017) *Held Back by Debt: how Britain's lack of financial resilience is tipping people into a debt trap.* London: StepChange Debt Charity.

These changes should be rolled out as soon as possible, allowing for legislative change for the provision of grants and to set flexibility in deduction rates.

Responsibility for change
The DWP.

10.5 The benefit cap

The benefit cap was introduced in 2013. It sets a flat rate amount of benefits that a household can receive. The cap was originally set at the average gross income of a household in work, excluding income from benefits.[66] This was £26,000 a year for couples, with or without children, and single people.

However, a lower cap was introduced that reflected no link to average household earnings. Since 2017, the cap has been £23,000 a year in London for families (£15,410 for single people), and £20,000 across the rest of Great Britain (£13,400 for single people).

The impact of the lower cap is widespread. In February 2018, 78 per cent of affected households were only capped because of the lower cap levels. Fourteen per cent would have been affected by the previous, higher cap.[67]

The lower cap is different for single people and families, and recognises higher rents in London,[68] but still does not sufficiently take a household's circumstance into account. For example, the cap is the same amount for a family with two children as for a family with four children.

The cap works by reducing Housing Benefit if the overall amount of benefits a household receives, with some exemptions,[69] exceeds the cap. Under Universal Credit, the cap is applied to the total amount, and not just support with housing costs. Households receiving Working Tax Credits[70] are exempt, to encourage people to consider working enough to be eligible for Working Tax Credit to avoid its impact.[71]

Problem
As discussed earlier in this chapter, people are at an increased risk of homelessness where Local Housing Allowance rates do not reflect market rents. However, if Local Housing Allowance rates are increased to the 30th percentile of the market, as strongly recommended, there will be more households affected by the benefit cap. This issue will also occur when DWP end the freeze on Local Housing Allowance in 2020.

These households, and those already affected by the cap, will simply have less money to spend on other household essentials. They will then experience impossible choices

66 CIH analysis shows that a family with a net income of £20,000 would still be eligible for some benefits to top up earnings. For example, in 2017 a couple with two children would still receive £3,370 in child tax credits and £1,709 in child benefit. They would also qualify for Housing Benefit if their rent exceeded £106 per week on top of £20,000 of earned income. From: Pipe, D. (2017) *CIH response to: work and pensions benefit cap inquiry.* Coventry: Chartered Institude of Housing.
67 Department for Work and Pensions (2018) *Benefit cap: data to February 2018*. London: Department for Work and Pensions.
68 This results in entitlement to higher amounts of Housing Benefit.
69 Including: those living in supported accommodation; those entitled to Working Tax Credit; and those in receipt of Disability Living Allowance, Personal Independent Payment, Attendance Allowance, and the support component of Employment and Support Allowance; or the limited capability for work-related activity component of Universal Credit. From Pipe, D. (2017) *CIH response to: work and pensions benefit cap inquiry.* Coventry: Chartered Institude of Housing.
70 Working Tax Credits are a benefit designed to top up income if someone is in work and on a low income.
71 Kennedy, S., Wilson, W., Apostolova, V., Keen, R. (2016) *The Benefit Cap*. London: The House of Commons Library.

as to whether to pay rent, to pay utility bills, or to feed and clothe their family. Either way, the risk of homelessness increases.

An analysis looking at the rate of homeless acceptances by local authorities and the numbers of households affected by the cap suggest there is a correlation between the two. As shown in figure 10.7, this suggests the benefit cap has an effect on levels of homelessness.

The impact of the benefit cap for affected households is severe. It mostly hits households that are entitled to higher amounts of support in the benefit system. And so it mainly affects households with children.[72]

More than half (56%) of households hit by the cap have lost up to £50 a week from their Housing Benefit, and three in ten (30%) have lost between £50 to £100 a week.[73] For low-income households, this is a significant amount of money that increases their homelessness risk.

This impact of the cap is made worse by the fact that many of the households affected are recognised as experiencing barriers to work. Most of those affected are single parent households. Of these, 77 per cent had at least one child under the age of five, including 33 per cent that had a child under the age of two.[74] Caring duties, along with high childcare costs, are often the main reason why single parents are not in work, or able to increase their working hours, when they have young children.[75]

These barriers are recognised elsewhere in the benefit system, where single parents of young children can receive Income Support.[76]

However, for many of these households their only option of avoiding the cap is through work. Moving to cheaper accommodation to avoid the cap is not only impractical for most of those affected, but increasingly impossible. As shown by our research with the CIH, and in Chapter 11, there are too few places across Great Britain that are affordable to move to.

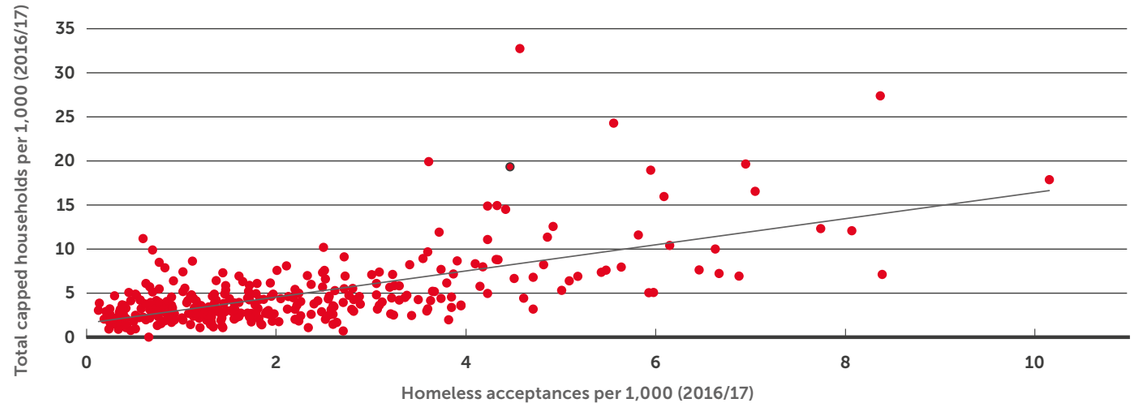
Shelter case study
Shelter assisted a single mother in Sheffield who faced a £98 a week gap between her Housing Benefit and her rent. Her youngest child was nine months old, but she had been looking for work. She found work as a carer but she had to turn it down because she could not afford the cost of a Disclosure and Barring Service (DBS) check (commonly known as a background check). She also found it hard to work the hours offered as they clashed with school drop-off and pick up times, and she could not afford the after-school clubs or nursery fees.

The benefit cap therefore increases the risk of poverty and homelessness for families with young children. This undermines strong evidence that action to prevent child homelessness should be prioritised to prevent future homelessness.[77]

As well as households receiving Income Support (51% of affected households), 15 per cent

72 Department for Work and Pensions (2018) *Benefit cap: data to February 2018* London: Department for Work and Pensions.
73 Department for Work and Pensions (2018) *Benefit cap: data to February 2018* London: Department for Work and Pensions.
74 Department for Work and Pensions (2018) *Benefit cap: data to February 2018* London: Department for Work and Pensions.
75 Save the Children (2018) *Lost opportunities, lost incomes*. London: Save the Children.
76 Income Support is a benefit to help people on low incomes or with no income at all. Single parents with children under the age of five are not required to look for work in order to receive Income Support.
77 Bramley, G. and Fitzpatrick, S. (2018) 'Homelessness in the UK: who is most at risk?' *Housing Studies*, 33(1), 96-116.

Figure 10.7 Correlation between local homelessness acceptances and number of households affected by the benefit cap



Source: Jonson, P. (2017). Analysis provided from Westminster local authority EASI HELP initiative as part of the Crisis consultation.

were receiving the work-related activity component of Employment and Support Allowance.

People receiving this benefit have been assessed as needing to prepare for work but not actively enter it in the near future, due to ill health and disability. Just 19 per cent of households hit by the benefit cap have been in receipt of Jobseekers Allowance, which requires households to be able to look for work.[78]

Shelter case study
Shelter helped a local authority tenant in Dorset with mental health needs who was hit by the cap when her disability benefits were stopped. She could not move to cheaper accommodation because other types of housing were more expensive. She struggled to pay her rent and was threatened with eviction. To make rent payments, she stopped eating and had lost so much weight that she was down to six stone.

Research by the CIH has shown that households unable to move into work have been forced to go without food, heating or buying clothes for their children, or have been falling into arrears because of the cap.[79] The choice to go without heating or food to avoid falling into rent arrears may decrease the direct risk of homelessness, but should not be a choice a household has to make.

The impact of the benefit cap for those unable to be exempt has been mitigated somewhat by the use of Discretionary Housing Payments (DHPs).[80] *The Scotland Act (2016)* fully devolved DHPs to the Scottish Government from April 2017, giving it powers to legislate its own scheme.

DHPs are a limited resource that can be allocated, usually for a short period of time, by local authorities if someone experiences a gap between their rent and Housing Benefit. This means there are competing priorities for the funding, as this gap can be caused by a number

78 Department for Work and Pensions (2018) *Benefit cap: data to February 2018*. London: Department for Work and Pensions.
79 Chartered Institute of Housing (2017) *Feeling the pinch – the lowered benefit cap one year on*. Coventry: Chartered Institute of Housing.
80 DHPs are payments that can be made at the discretion of local authorities to help those entitled to housing benefit with housing costs. As they are discretionary, some local authorities attach conditions to the receipt of DHP. They are not intended to be a long-term payment.

of welfare policies.[81] In 2015/16, 18 per cent of the DHP budget in Great Britain was spent on mitigating the impact of the benefit cap.[82]

A number of local authorities have reported that the level of DHP funding has not been proportionate to the rise in demand.[83] The competing priorities for DHP have also meant that some local authorities have attached conditions to the funding in England and Wales. Some local authorities require people receiving DHP to search for work or meet some of the gaps themselves.[84] This effectively leads to a 'postcode lottery' regarding allocation.[85] It means in some places DHP cannot help people affected by the benefit cap who cannot move into work to avoid its impact.

In Scotland, the government has committed to using DHP funding to fully mitigate the impact of the Spare Room Subsidy, which has a widespread and severe impact on social housing tenants.[86] The majority of DHP funding is spent on this. If Local Housing Allowance is returned to the 30th percentile, which is strongly recommended, this may affect the funding level needed to ensure the benefit cap does not cause homelessness.

Solution
There must be increased flexibility to lift the benefit cap in specified circumstances related to homelessness.

This flexibility should be focused on people likely to need support from DHPs for a long period of time, for example more than a year, to avoid homelessness because of the cap. The Work and Pensions Select Committee's inquiry into the cap found that DHPs inadequately support those that are unlikely to be able to mitigate the cap for more than two or three years.[87]

The cap flexibilities should be prioritised for single parents with young children at risk of homelessness, who are recognised as having high barriers to work due to caring duties and high childcare costs.[88] People at risk of homelessness where illness and disability create a barrier to entering work should be included. The flexibilities should also be available for homeless people where the cap is a barrier to securing stable housing.

In practice, this should be implemented through Jobcentre Plus. Housing Options teams and Jobcentre Plus housing and homelessness leads (see employment support section) should be able to lift the cap for the length of time needed. This is to protect households at risk of homelessness that cannot enter work in the near future.

81 Including the reductions and freeze on Local Housing Allowance; the Spare Room Subsidy which applies in the social sector and financially penalises someone if they are deemed to under-occupy their house, and the benefit cap.
82 Wilson, W. (2017) *Discretionary Housing Payments*. London: House of Commons Library.
83 Work and Pensions Committee (2017) *Benefit cap "starting to bite" across Britain*. https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2015/benefit-cap-evidence-16-17/
84 Wilson, W. (2017) *Discretionary Housing Payments*. London: House of Commons Library.
85 Wilson, W. (2017) *Discretionary Housing Payments*. London: House of Commons Library.
86 The Spare Room Subsidy, also commonly known as the 'Bedroom Tax', reduces Housing Benefit for those in the social sector if someone is deemed to be under occupying their accommodation by having too many bedrooms.
87 Wilson, W. (2017) *Discretionary Housing Payments*. London: House of Commons Library.
88 Shelter (2017) *'Written evidence on the benefit cap'*. http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/work-and-pensions-committee/the-benefit-cap/written/49886.html

In Jobcentre Plus, those affected by the cap and at risk of homelessness should be identified by incorporating housing need in the assessment framework (see employment support section).

The allocation and investment in DHP must also match this flexibility with the benefit cap to prevent homelessness. Investment must be based on both the current impact of the cap and projected impact when Local Housing Allowance is restored to the 30th percentile of market rents.

Impact
This flexibility will mean the cap does not put people at risk of homelessness where they do not have options to avoid the cap, but cannot sustain income levels as a result of the cap.

This flexibility through Jobcentre Plus and Housing Options teams means that those exempt can also be supported towards employment that covers the cost of housing, and childcare where relevant, within an appropriate timeframe. This will help secure and stabilise housing over the long term.

These changes should be implemented as soon as possible, allowing for administrative change. The allocation and level of DHP funding should align with the timescales to return Local Housing Allowance to the 30th percentile.

Responsibility for change
The DWP.

10.6 Employment support

So far this chapter has focused on improving financial support for housing costs. It will now focus on how to help homeless people to find and keep the paid employment that many aspire to.

Homeless people are individuals, not an homogenous group. Employment histories, attempts to find work, and the type of the support needed vary considerably from person to person. Some homeless people are already in work, but struggle to cover high housing costs. Other homeless people are likely to need relatively little support to find work.[89] Yet others need much more help to deal with the barriers to employment affecting them. As well as their homelessness, these barriers can include a lack of skills, training, qualifications, and mental health issues and disabilities.[90]

Some homeless people, such as young people, migrants, and prison leavers, are likely to need more specialist advice and support to increase their chances of successfully finding and sustaining suitable work.[91]

Evaluations of good practice identify key elements of successful employment support as: flexible, person-centred coaching, combined with help that addresses other problems including housing and mental health issues.[92] Working with

89 Rowe, S. and Wagstaff, T. (2017) *Moving On: Improving access to housing for single homeless people in England*. London: Crisis.
90 Bramley, G., Fitzpatrick, S., Edwards, J., Ford, D., Johnsen, S., Sosenko, F., Watkins, D. (2015) *Hard edges: Mapping severe and multiple disadvantage*, London: Lankelly Chase Foundation.
91 McHugh, K. (2018) *Evidence from the Employment Related Support Association from a review of employment support for homeless people for Crisis*.
92 Partnerships for opening doors (2014) *A summit on integrating employment and housing strategies to prevent and end homelessness*. https://www.usich.gov/resources/uploads/asset_library/Partnership_Summit_Effective_Practices.pdf; Shaheen, G. and Rio, J. (2007) *Recognizing Work as a Priority in Preventing or Ending Homelessness*. http://www.nchv.org/images/uploads/Work%20as%20a%20Priority%20Journal%20of%20Prevention_WEB.pdf; Jones, A., and Pleace, N. (2010) *A review of Single Homelessness in the UK*. London: Crisis.

specialist services, where appropriate, to address these barriers can increase success,[93] as can supporting people in the workplace once they find employment to help them keep and progress in their jobs.[94]

Kings College London research from 2016 found homeless people using employment, training and education programmes, when resettled into housing, were significantly more likely to be involved with these programmes five years on.[95] The study also showed that these programmes were more successful the earlier they were provided to long-term homeless people. Clearly, programmes to support people towards and into work should be provided alongside rapid rehousing models.

Evidence from other programmes for homeless people (for example, the Housing and Employment Programme (HELP) in Westminster) show that assistance with employment goals also improves housing stability itself.

Central to the HELP model is access to on-going one-to-one, flexible and holistic coaching. HELP also gives financial support, including assistance with childcare costs, to reduce additional barriers to work. Within the programme 80 per cent of those it supported remained in employment after 12 months.[96]

Evidence of how to support homeless people into work highlights that employment and housing issues are linked. People struggle to gain employment without housing, and vice versa. This was also strongly evidenced in our research with the CIH, discussed earlier in this chapter, regarding affordability of the private rented sector for working households. So, efforts to help people into employment must understand and respond to housing needs if they are to be successful.

Too often this link is not made when homeless people seek assistance from Jobcentre Plus.

Our recommendations for reform involve the following interconnected issues.

- The need for specialist housing and homelessness expertise within Jobcentre Plus.
- The need for changes to the way 'work capability' is assessed.
- The functioning of conditionality and sanctions in relation to homelessness.

The response to homelessness within Jobcentre Plus

Problem

Jobcentre Plus is often the first port of call for homeless people and those at risk of homelessness who need support from the welfare system. Work coaches in Jobcentre Plus can apply safeguards through Universal Credit to support homeless people to stabilise housing. These safeguards should also protect people at risk of homelessness from further housing instability.

This includes setting up direct payment of Housing Benefit to landlords where necessary or applying the homeless easement to job searching. The easement applies to newly homeless people and enables them to have a period where their job-seeking requirements are suspended, so that they can focus on stabilising their housing.

Another form of help that should be available for Universal Credit claimants affected by homelessness is the Flexible Support Fund. This fund should provide financial support to reduce barriers to work for those on low incomes.[97]

A number of issues with the Flexible Support Fund have been raised since its creation. These include:

- the discretionary nature of the fund leading to a postcode lottery of how it is used
- the lack of awareness about the fund among work coaches
- the lack of advice to work coaches on how to use it
- a 2013 evaluation of the fund found that while awareness of it has increased slightly since its introduction, work coaches use the fund in a sporadic and limited way.[98]

This has been reflected in the fact that the fund has been underspent. In 2014/15, almost half (48.8 per cent) of the available budget under the Flexible Support Fund was not spent, and in 2015/16, the underspend was 24 per cent.

This reduction in underspend appears to be from a reduction in the money available under the Flexible Support Fund. It has not resulted from addressing the on-going concerns about the lack of awareness of the fund within Jobcentre Plus and how to use it.[99]

To offer the right support for homeless people and those at risk of homelessness, Jobcentre Plus staff must genuinely understand homelessness and housing need. The detrimental impact that homelessness has on someone's health and their realistic ability to pursue employment goals should be understood.

In many circumstances, people will not necessarily have accessed local authority statutory homelessness provision. Even where they have, this information may not currently be considered as part of the assessment process at Jobcentre Plus. In England, this situation should improve from October 2018 with the implementation of the duty to refer under *The Homelessness Reduction Act (2017).* From this date, Jobcentre Plus must refer consenting customers identified as homeless to local authority Housing Options teams.

The experience of local Crisis teams of working closely with Jobcentre Plus has shown that staff can struggle to recognise, understand and respond to homelessness. This was also highlighted as a key issue by people with experience of homelessness participating in the consultation to inform this plan.[100]

Work coaches are required to apply time limits when working with Universal Credit claimants. Initial interviews for new claims last 40 minutes; on-going appointments are limited to ten minute time slots. This partly explains the difficulties work coaches face in identifying the details and complexities of homelessness cases, and helping people faced with both unemployment and housing crises.[101]

93 Bevan, M. and Ruggs, J. (2006) *Providing Homelessness Support Services in Rural and Remote Areas: Exploring models for providing more effective local support*. Glasgow: Communities Scotland.
94 Marshall, T., Goldberg, R., Braude, L., Dougherty, R., Daniels, A., Ghose, S., George, P., Delphi-Rittmon, M. (2014) Supported employment: assessing the evidence. *Psychiatric Services*, 65(1), 16-23. United States: National Coalition for Homeless Veterans.
95 Crane, M., Majorie, L., Joly, A., Manthorpe, J. (2016) *Rebuilding Lives: Formerly homeless people's experience of independent living and their longer-term outcomes*. London: Kings College London
96 Jonson, P. (2017) Submission to Crisis consultation of evidence on how to end homelessness.
97 McGuinness, T., Kennedy, S., Jones, A. (2016) *Jobcentre Plus Flexible Support Fund*. London: House of Commons Library
98 McGuinness, T., Kennedy, S., Jones, A. (2016) *Jobcentre Plus Flexible Support Fund*. London: House of Commons Library
99 McGuinness, T., Kennedy, S., Jones, A. (2016) *Jobcentre Plus Flexible Support Fund*. London: House of Commons Library
100 Crisis, Groundswell and uscreates (2018) *The lived experience of homelessness*. London: Crisis
101 Work and Pensions Committee (2016) *The Future of Jobcentre Plus*. London: House of Commons.

Jobcentre Plus staff need a good working knowledge of homelessness itself, particularly how a lack of stable housing can affect someone's ability to find work.

Crisis' clients and staff report that without this knowledge work coaches unintentionally create barriers for homeless people to stabilise their housing. This can also make it harder for them to focus on work. For example, work coaches do not apply the homeless easement in Universal Credit, which would allow homeless people to prioritise finding stable accommodation, before searching for work. Crisis services report that where this has been applied correctly, it has been hugely beneficial for homeless people and has allowed them to sustainably work towards employment goals.

Understanding the interaction of housing and employment means Jobcentre Plus staff can make employment requirements and outcomes more realistic to homeless people.[102]

In Edinburgh, initial training given by Crisis team members to Jobcentre Plus work coaches has resulted in the two organisations working as partners. This is supported and led by a homelessness lead in the Jobcentre, and includes fortnightly drop-in sessions where Crisis coaches spend allocated time at Jobcentre Plus. This means the Jobcentre Plus work coaches can make appointments for their customers that have housing and homelessness issues with the Crisis coaches. Crisis and Jobcentre Plus work coaches work together to ensure the support provided complements each other.

In Newcastle, Crisis teams are involved in a Homelessness Prevention Trailblazer Programme. This pilot project is testing new ways of working with Jobcentre Plus and the local authority to prevent homelessness under *The Homelessness Reduction Act (2017)* in England. Newcastle City local authority, Newcastle Jobcentre Plus, Crisis, and Your Homes Newcastle have built partnership working towards agreed homelessness prevention goals.

Findings from the first six months of the pilot are positive. Most people engaged in the programme are benefiting from either having their housing stabilised or their homelessness prevented. And some have been supported to find work.

Crisis case study

Kristina* had previous experience working as a driver, but was claiming Jobseeker's Allowance after a long period out of work. She was supported by Jobcentre Plus to obtain professional driving qualifications and to update her CV. She lacked confidence and was very anxious, requiring more intensive support than her Jobcentre Plus work coach was able to offer. She was living in an overcrowded house with eight other people, occasionally sleeping on a friend's kitchen floor. Kristina did not see herself as homeless and was afraid of mentioning her housing situation to Jobcentre Plus.

When she heard about Crisis in London through her local church group she approached them for help. Crisis provided intensive coaching support, training on how to speak to employers and support to create an email account with a member of staff present. She volunteered as a mini bus driver over Christmas and the following month started work as a minibus driver for a local community transport service. She now works as a school bus driver and is looking for work as a London bus driver.

102 Pleace, N. & Bretherton, J. (2017) *Crisis Skylight: Final Report of the University of York Evaluation.* London: Crisis.

Crisis case study: Newcastle Homelessness Prevention Trailblazer

Ben* came to the Jobcentre Plus explaining he was sofa surfing with friends. He was extremely anxious and depressed as he was no longer able to continue this arrangement, and had nowhere else to stay. This meant he was at risk of rough sleeping. Through the Trailblazer Programme, Jobcentre Plus had close links with Crisis and so Ben was referred to Crisis teams in Newcastle for support with housing and his mental health needs.

The Jobcentre Plus work coach immediately applied the homeless easement to Ben's Universal Credit claim. This allowed him to focus on stabilising his housing. Crisis secured stable housing within three days and set Ben up with Crisis progression and wellbeing coaches. Ben's easements were continued while he used other Crisis services. This included taking the Renting Ready qualification to manage his own tenancy.

Given Ben's progress, his Jobcentre Plus work coach asked him to consider volunteer work as part of his commitments. So, he successfully volunteered in a senior position which involved fundraising for a local event.

Crisis and Ben's work coach in Jobcentre Plus are working closely together supporting Ben to complete an employment trial in hospitality.

*Crisis clients, not their real names.

Solution

Establish a network of housing and homelessness leads in Jobcentre Plus to integrate housing and employment support.

The scale of the homelessness crisis across Great Britain means that every Jobcentre Plus will need to respond to the issue. Investment in a dedicated housing and homelessness lead within each Jobcentre Plus will significantly improve the functioning and efficiency of Universal Credit and how homeless people experience the service. The purpose and suggested impact of this approach follow below.

1 The housing and homelessness lead would ensure that Jobcentre Plus work coaches are supported and trained to effectively recognise and respond to homelessness and housing need. The lead would ensure that work coaches complete a training module, delivered in person and in collaboration with local homelessness specialists. The training would equip work coaches with the knowledge and skills to recognise a person's housing situation and how it could affect their ability to find work.

The module would help coaches raise the sensitivities of homelessness and housing as an issue with their clients. It would explain the positive impact of applying Universal Credit safeguards such as the homelessness easement, direct payment of Housing Benefit to landlords and grants for covering housing costs at the beginning of a claim as recommended in this chapter. The training would also enable work coaches to arrange the necessary on-going support for their homeless customers, ideally working outside strict time-limits for interviews and appointments.

2 The housing and homelessness lead would ensure that work coaches are aware of and use the Flexible Support Fund to help prevent or respond to homelessness by overcoming short-term financial barriers to job seeking. For example, searching for, and obtaining, work involves costs. Some homeless people may not have suitable clothes for interviews or work, or be able to cover travel costs for either. For those that are self-employed, tools and equipment for jobs such as in painting and decorating may be needed. Further training and qualifications may also require spending to enrol in courses and have access to a computer or laptop.

3 The housing and homelessness leads would establish and support joint working arrangements and protocols with their local authority Housing Options teams. This would involve practical referral mechanisms between Jobcentre Plus teams, Housing Options teams and local partners. It could also involve Jobcentre Plus staff and local partner staff basing themselves within the local authority to jointly work with Housing Options team staff, and vice versa. Protocols for data sharing between Jobcentre Plus and local authorities should be established. These protocols would enable both to accurately record and learn from information relating to the outcomes of employment and housing support given to homeless clients.

To embed this way of working, **homelessness and housing need must be incorporated in the Jobcentre Plus work coach assessment framework.** This should include recording rent levels. This will allow work coaches to tailor safeguards in the welfare system to homelessness, including flexibility under the benefit cap (recommended earlier) and conditionality (discussed later in this section).

Impact
These changes will help drive the culture shift needed to make housing part of mainstream employment support. This will help ensure better employement outcomes for homeless people and those at risk of homelessness, to prevent and respond to homelessness. Work coaches will learn more about how a homelessness holistic service model operates, understand homeless peoples' needs, and how to assess and identify a range of underlying needs.

Shared knowledge and understanding across different organisations is critical to developing a better identification process for homeless clients. It will help Jobcentre Plus identify customers at risk of, or experiencing homelessness, and help homelessness organisations better understand the different Jobcentre Plus initiatives that benefit homeless people.

These changes should be implemented as soon as possible. The training should be available and delivered nationally in England before the implementation of the duty to refer under *The Homelessness Reduction Act (2017)* in October. Similar timescales should apply to Scotland and Wales.

Responsibility for change
The DWP would be responsible for establishing a network of homelessness and housing leads within Jobcentre Plus.

The Work Capability Assessment

Problem
Health issues and disability can prevent homeless people from taking steps towards employment, even if they want to work immediately or in the future.[103]

The Work Capability Assessment (WCA) is used by the DWP to assess whether someone can work towards employment, taking into account any health needs and disabilities.[104] It includes a range of descriptors set out in legislation which cover different tasks, and a point scoring system. The more difficult tasks described correlate to scoring higher points in the assessment.

The results from the WCA determine the type of employment support and conditionality a claimant can expect. If someone is found 'fit for work', they are required to search for work immediately and can claim Jobseekers Allowance. If health or disabilities are found to prevent someone from entering employment, they are either eligible to be in the Work-Related Activity Group (WRAG) of Employment Support Allowance (ESA), or the ESA Support Group.[105]

Those in the ESA Support Group have been assessed as experiencing significant barriers to work due to health and disability. There are no requirements for them to engage in work-related activity such as engaging in employment programmes.

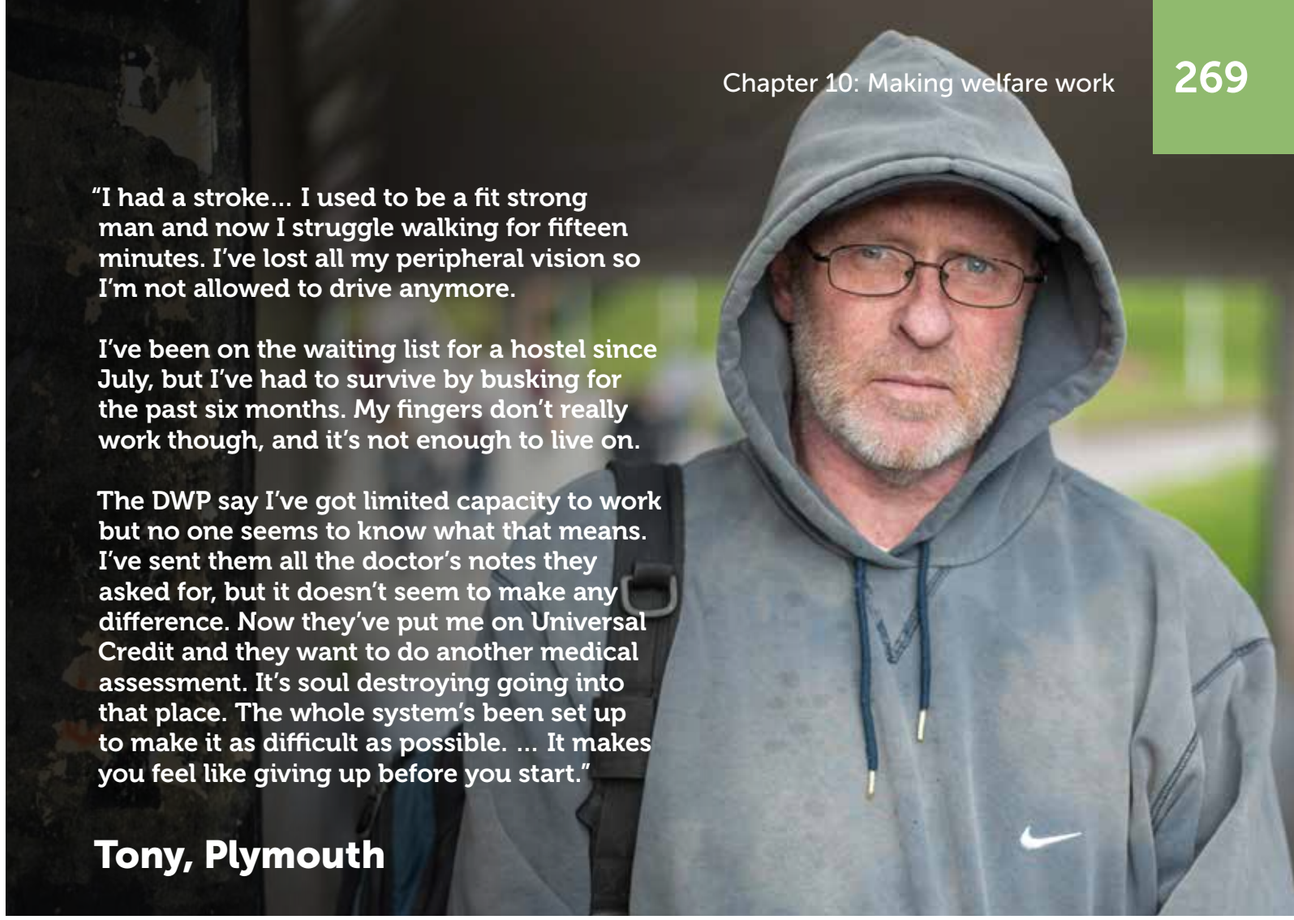
Those in the WRAG have been assessed as having limited capability for work right now, but can take steps to improve this and move towards employment. They are required to engage in work-related activity, although there are exceptions.[106] In Universal Credit, these will form

103 Bramley, G., Fitzpatrick, S., Edwards, J., Ford, D., Johnson, S., Sosenko, F., Watkins, D. (2015) *Hard Edges: Mapping Severe and Multiple Disadvantage in England.* London: Lankelly Chase Foundation.

104 A minority with very high support needs, or those with a terminal condition, will not be required to take the WCA but will be assessed based on the completed health questionnaire required before being invited to an assessment. However, most people are asked to attend a face-to-face assessment.

105 Or the equivalent 'limited capability for work' or ' limited capability for work and work-related activity' element in Universal Credit.

106 Single parents with children under the age of one and those that have reached state pension credit age are not required to engage in work activity if they are in the WRAG.



part of their Claimant Commitment. This commitment is set between the recipient and their Jobcentre Plus work coach. It acts as a record of what someone must do to receive, and continue receiving, Universal Credit.

Although the WCA is meant to assess whether some people can undertake work or work-related activity, it fails to identify the impact that homelessness has on someone's ability to manage their disability or medical condition.

For some people, homelessness is a compounding factor that impedes work ability. Mental health needs are also more common among homeless and vulnerably housed people than in the general population.[107] Crisis coaches find that some clients are either found 'fit for work' or placed in the WRAG when their health needs, compounded by being homeless, significantly impede their ability to work.

Requiring someone to find work or take part in work-related activity when they have to manage both a health condition and homelessness can make both issues worse. This leads people even further away from being ready to find and enter a job. The high proportion (60% over 2016)[108] of ESA 'fit for work' decisions overturned at appeal shows the WCA fails to adequately assess barriers to work for those with health issues and disabilities, including homeless people.

107 Crisis (2009) *Mental Ill Health in the Adult Single Homeless Population*. London: Crisis.

108 Department for Work and Pensions (2017) *Employment and Support Allowance: Work Capability Assessments, Mandatory Reconsiderations and Appeals*. London: Deparment for Work and Pensions.

Solution
The alternative criteria guidance for the WCA should recognise the impact of homelessness on work capability.

The descriptors in the WCA provide a way to assess and score the fitness to work of claimants. However, the guidance relating to the legislation also sets out alternative criteria. This is for cases where the 'claimant could carry out all the activities in the assessment, but would be treated as if they had either limited capability for work, or limited capability for work and work-related activity.'[109]

Under the alternative criteria, specific circumstances are taken into account and recognised as impeding someone's ability to undertake work-related activity. They can be used to qualify someone as being in either the ESA WRAG or Support Group, even if they don't qualify from their point scores on the assessment.

This can include situations where health conditions, or disabilities, can put the physical or mental health of the assessed person at risk if required to undertake work-related activity.

The alternative criteria and guidance should be updated to include homelessness.

This could include guidance for those that would be recognised as having limited capability for work only, which would mean they qualify to be in ESA WRAG:

- If the claimant has been homeless, as defined by sleeping rough or in emergency accommodation, within the last six months. They are to be treated as having limited capability for work where engagement with work would put the physical and/or mental health of the claimant or others at risk.

To reflect the severe impact of rough sleeping on mental and physical health, the guidance for those recognised as having limited capability for work and work-related activity (and who would qualify for ESA Support Group) could include the following:

- If the claimant is sleeping rough, or has a history of sleeping rough, or has been made a Housing First offer. They are to be treated as having limited capability for work and work-related activity where engagement with work would put the physical and/or mental health of the claimant or others at risk.

This will need to be supported by training for benefit assessors to ensure they can recognise homelessness and understand its impact on work capability. The training needs are likely to be similar to those identified for Jobcentre Plus work coaches, and so a similar training module and approach should be rolled out across these providers.

Impact
This means the WCA would recognise the compounding impact of homelessness on both physical and mental health conditions, as discussed in Chapter 8, 'Ending rough sleeping', and the impact on work ability.

This change will make the WCA more accurate for homeless people, helping them access the support needed in the welfare system to resolve homelessness.

This change should be implemented as soon as possible, allowing for legislative change for the alternative criteria guidance.

Responsibility for change
The DWP should work with homelessness organisations to establish the most effective way of incorporating homelessness and

109 Department for Work and Pensions (2016) *A guide to Employment and Support Allowance – The Work Capability Assessment*. London: The Department for Work and Pensions.

housing need within the alternative guidance criteria.

Conditionality and sanctions

Problem

Conditionality is a key feature of the welfare system in the UK. It is based on the principle that 'access to certain basic, publicly provided, welfare benefits and services should be dependent on an individual first agreeing to meet particular obligations or patterns of behaviour.'[110] Sanctions are a tool to enforce welfare conditionality through reduced entitlement to financial support through the work-related elements of Universal Credit.

Conditionality, backed by sanctions, has been a feature of the British welfare system since the late 1980s. However, there has been an increase in the role and severity of conditionality and sanctions over the last three decades. Since 1997, conditionality has been central to the welfare system. In 2012 further reforms were introduced through Universal Credit[111] with the aim of tackling a perceived culture of 'something for nothing'.[112]

There is support for the principle of conditionality among homeless people and those at risk of homelessness, even among those who have been sanctioned.[113] However, research shows that the conditionality system has an overwhelmingly negative impact on homeless people and those at risk of homelessness. Sanctions are often applied when homeless people and those at risk of homelessness cannot comply with conditions rather than because they choose not to comply.[114]

A major study conducted for Crisis showed that homeless people are twice as likely to be sanctioned than the general population.[115] And homeless people with higher support needs, including mental ill health, or dependency issues, are more likely to be sanctioned than homeless people without these vulnerabilities.

This was reflected in the experience of people with lived experience of homelessness that participated in the consultation undertaken to inform this plan.[116] They felt that Jobcentre Plus work coaches do not fully understand the vulnerability of the people they are working with and their difficulties in keeping appointments, managing debt and living at the same address.

"I was threatened with sanctions because they were telling people to attend unreasonable appointments or sending letters too late. The staff don't understand how to talk to vulnerable people. This delayed my first Universal Credit payment and I had to sign on daily and sofa surf."

(Consultation participant, Liverpool)

110 University of York (2016) *What is welfare conditionality?* http://www.welfareconditionality.ac.uk/about-our-research/what-is-welfare-conditionality/

111 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L., Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions*. London: Crisis.

112 Department for Work and Pensions (2013) *Press release: Benefit sanctions - ending the 'somthing for nothing' culture.* https://www.gov.uk/government/news/benefit-sanctions-ending-the-something-for-nothing-culture

113 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L., Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions.* London: Crisis.

114 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L., Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions.* London: Crisis.

115 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L., Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions.* London: Crisis.

116 Crisis, Groundswell and Uscreates (2018) *The lived experience of homelessness.* London: Crisis.

Conditionality requirements are often inappropriate and unrealistic for homeless people. This stems from a lack of understanding of the impact homelessness has on someone's ability to get involved in employment-related activity.

Sanctions are intended to incentivise behaviour change so the person complies with the conditions of seeking employment. The evidence in relation to homelessness however, demonstrates the opposite. Recent research reports that 60 per cent of homeless people sanctioned say that the sanction impeded their ability to look for work.[117] Three quarters of homeless people reported they have gone hungry or skipped meals due to a sanction. The same proportion say sanctioning has negatively affected their mental health.

Rachel's experience[118]

Rachel started sleeping rough in 2015 after sofa surfing. She was suffering from anxiety and depression. While sleeping rough, Rachel started to claim Jobseekers Allowance. At her first appointment at Jobcentre Plus, a work coach told Rachel that to recieve the benefit, she must register online to upload her CV and do a daily job search.

Rachel said that she would meet these conditions, but left the Jobcentre feeling unsure if she could achieve them or if she had understood the things she had agreed to. Rachel had only the clothes she was wearing and did not know where her next meal was coming from. She had no computer skills, did not know how to access the internet, and had no phone or money for a public phone.

Rachel returned to the Jobcentre two weeks later. She was still sleeping rough, feeling very low and felt unable to express herself. The work coach found that Rachel had not met the conditions of her claim and applied a sanction. This left Rachel reliant on supermarket vouchers for food, and donations for clothing and toiletries.

Kyle's experience[119]

Kyle missed out on a job opportunity because he could not afford to keep his mobile phone running while he was sanctioned. Kyle explains what happened: 'I lost a trial shift in a restaurant. They said they tried to phone me and my phone was off and they hired someone else. It was a 28-hour kitchen porter job and it's not far away so would have been good 'cos my hostel's just in town, I could have been there in ten minutes.'

Those receiving a sanction can apply for a hardship loan. Homeless people are able to access a hardship loan immediately, in recognition of the impact of sanctions. However, as discussed earlier in this chapter, the repayment of hardship loans can often mean prolonged financial difficulty for homeless people, even once a sanction has been lifted. This means they can continue to face difficult choices on what essentials, such as rent, food, clothes, and bills, they should spend their money on.

Sanctions also cause homelessness for those at risk by taking away critical financial support when needed. Analysis of the experiences of 1,000 homeless people in the welfare system found that one fifth (21%) of people became homeless because of a sanction, and 16 per cent had to sleep rough.[120]

117 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L., Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions.* London: Crisis.

118 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L., Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions.* London: Crisis.

119 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L., Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions.* London: Crisis.

120 Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L., Reeve, K. (2015) *Homeless people's experiences of welfare conditionality and benefit sanctions.* London: Crisis.

Evidence shows that the conditionality and sanctions system seriously disadvantages homeless people and those at risk of homeless. It undermines their ability to get involved in employment activity and support.

The significant extension of conditionality under Universal Credit suggests there will be a negative impact on levels of homelessness. Under Universal Credit, recipients are 'required to treat looking for work as their full-time job.'[121] This means that work search requirements are set at around 35 hours a week. Additionally, conditionality applies to those receiving benefits while in work and earning below what they would earn working 35 hours a week at the National Minimum Wage. The purpose of this is to encourage people to move off Universal Credit, and away from perceived benefits dependency, through employment.

This means that those receiving Universal Credit will be expected to work towards meeting an earnings threshold or face sanctions. This can be met through a combination of measures. These include: increasing hours or hourly wage with their current employer; finding additional jobs alongside their existing employment; and finding a new job with higher income.[122]

These increased conditionality requirements will be set out in a Claimant Commitment. A significant safeguard against the unintended negative consequences of conditionality and sanctions on homeless people is the introduction of the homelessness easement under Universal Credit.

However, as discussed earlier in this section, the easement is not always applied when needed due to work coaches failing to recognise homelessness and its impact on job-seeking activity. The easement also does not apply to conditionality when someone is in work. So barriers to employment experienced by homeless people may mean they struggle to meet the new in-work conditionality, leading to sanctions and a return to homelessness even when in work. For homeless people already in work, barriers to increasing their number of hours in work, or their level of earnings, mean they will also be subject to sanctions.

Solution

The conditionality and sanctioning system must be reformed to ensure it does not cause homelessness.

To integrate homelessness and housing need into conditionality and sanctions, the following is needed.

- **The current homeless easement should be extended to anyone who is homeless,** rather than only applying to those that are newly homeless, until their housing situation is resolved. **It should also apply to those immediately at risk of homelessness** so they can temporarily stop looking for work, or trying to increase their hours if they are in work, while they stabilise their housing.

- **The extended easement should be applicable to contracted providers as well as Jobcentre Plus.**

- **Work search requirements should recognise housing-related activity.** For example, work search requirements may be reduced in the Claimant Commitment so that Universal Credit recipients can get housing-related support to avoid homelessness. This would then give them a better chance of finding successful employment.

To ensure conditionality and sanctions do not cause homelessness:

- **Sanctions should not be issued if they will cause homelessness.** Jobcentre Plus work coaches can determine whether a sanction is likely to cause homelessness by referring to their initial assessment. This should include homelessness and housing need, as recommended. Homeless people or those at risk of homelessness struggling to comply with the new in-work conditionality requirements should not receive a sanction if there is any concern it will put their housing stability at risk. As part of this, work coaches should record rent levels to ensure any sanction that is applied does not result in rent arrears and homelessness.

- **The first 'sanctionable' offence for Universal Credit recipients with a history of homelessness should be overruled.** Work coaches should be aware of someone's history of homelessness through homelessness and housing need being incorporated into the assessment framework. This should prompt a discussion between the individual and the work coach about barriers to compliance and review of the Claimant Commitment.

In the long term, the DWP must commission a review into the effectiveness of the current conditionality and sanctions regime. The review should evaluate the appropriateness and effectiveness of the newly expanded conditionality requirements in supporting homeless claimants into work.

Impact

These safeguards will give work coaches and contracted-out employment support providers' necessary tools to support integrated housing and employment goals for homeless people and those at risk of homelessness. They would prevent homelessness as a result of the conditionality and sanctioning system.

These changes should be implemented immediately, allowing for legislative changes. The timings should coincide with the roll-out of training for Jobcentre Plus work coaches around homelessness and housing need so that understanding of the impact of sanctioning, and where it is and isn't suitable, can be incorporated into the training.

The DWP should carry out a review of the conditionality and sanctions regime over 2019/20, to capture new Universal Credit claimants and those that migrate to Universal Credit.

Responsibility for change

The DWP.

121 Department for Work and Pensions (2011) *Universal Credit Policy Briefing Note 12.* http://webarchive.nationalarchives.gov.uk/+/http://www.dwp.gov.uk/docs/ucpbn-11-conditionality-threshold.pdf

122 Department for Work and Pensions (2011) *Universal Credit Policy Briefing Note 11.* http://webarchive.nationalarchives.gov.uk/+/http://www.dwp.gov.uk/docs/ucpbn-11-conditionality-threshold.pdf

10.7 Conclusion

Completing the welfare safety net to ensure homeless people and those at risk of homelessness can afford housing, and are supported where appropriate into long-term employment, is essential.

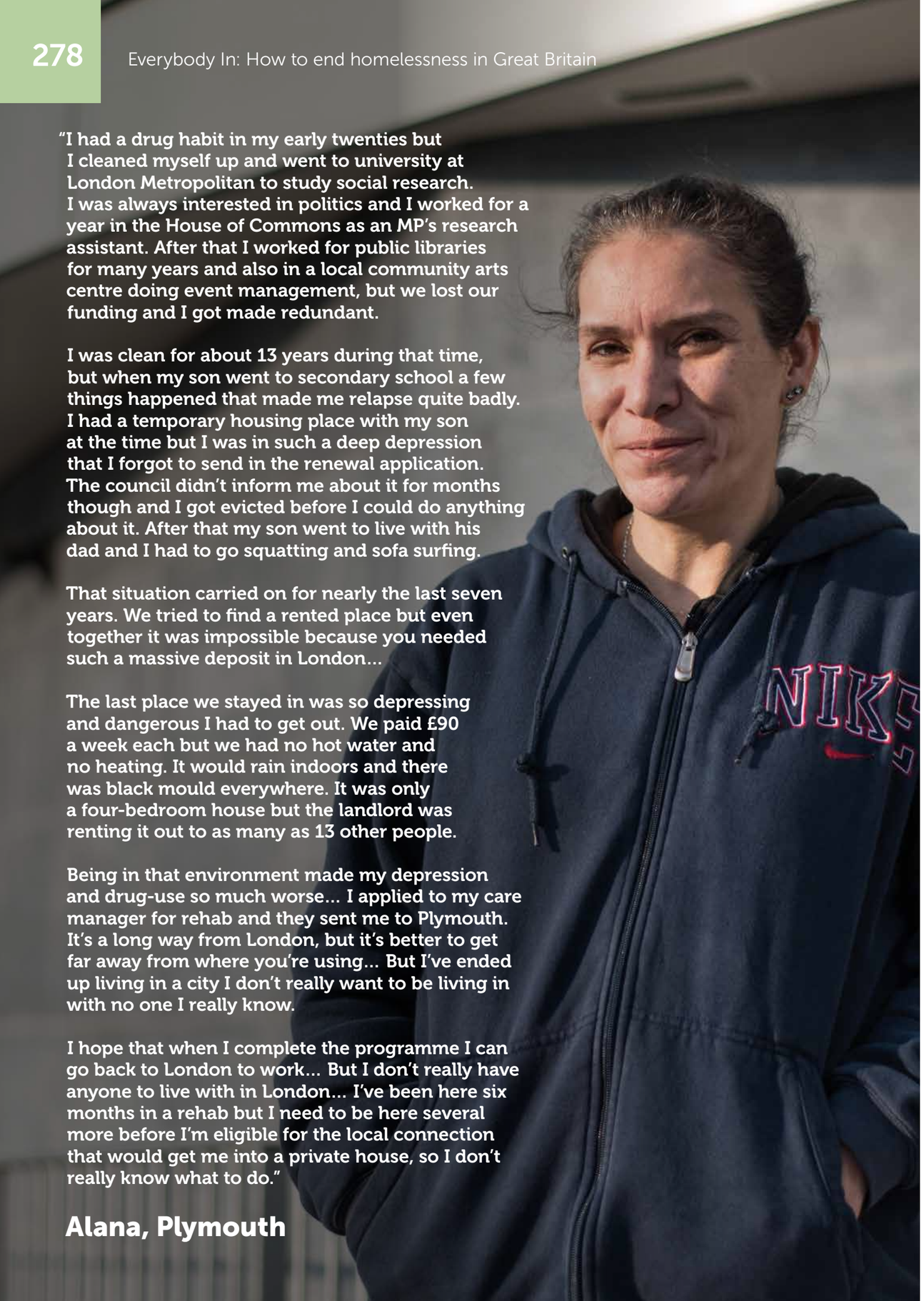
For people to be completely freed from homelessness risk, wider economic interventions are needed. These must increase the quality and income levels of employment across Great Britain[123] in line with interventions to create affordable housing available to homeless people.

If homelessness and housing need are made central to the welfare system now, the system will successfully support an end to homelessness in Great Britain. It will do this by supporting homeless people to cover the cost of housing, and meet their aspirations to work and help prevent future and repeat homelessness.

123 Rae, A., Hamilton, R., Crisp, R. and Powell, R. (2018) *Overcoming Deprivation and Disconnection in UK cities*. York: Joseph Rowntree Foundation.

10.8 Summary of recommendations

England/Westminster	Applicable nation
• Return Local Housing Allowance rates to the 30th percentile of market rents. • At a minimum, reform the allocation of Targeted Affordability Funding to ensure those that need it can access help. • Further improve the accuracy of Local Housing Allowance rates by using annual data from a national register on the size (number of bedrooms) of their rental property and the level of rent they are charging. • Change the way Local Housing Allowance is uprated to match average projected rent increases. • Exempt the following groups of homeless people and those at risk of homelessness from the Shared Accommodation Rate: people made a Housing First offer, all care leavers, people fleeing domestic abuse, prison leavers moving on from Approved Premises, and people with experience of homelessness with alchohol and drug dependency issues. • Reduce errors and delays in processing in Universal Credit by increasing staff capacity and training to match demand in service centres and on the Universal Credit helpline. • Ensure homeless people have access to the equivalent financial support that an advance payment would provide, whilst not having to pay it back. • Grant a three-month delay on any Universal Credit deductions for anyone identified as homeless or at risk of homelessness. • Allow Universal Credit deductions to be set at affordable levels for homeless people and those threatened with homelessness. • Introduce greater flexibility to lift the benefit cap in specified circumstances related to homelessness. • Establish a network of housing and homelessness leads in Jobcentre Plus to integrate housing and employment support. • Incorporate homelessness and housing need into the Jobcentre Plus work coach assessment framework. • Include the impact of homelessness on work capability in the alternative criteria guidance for the Work Capability Assessment. • Reform the sanctions and conditionality regime as follows. – A sanction is not issued if it will cause homelessness. – The first 'sanctionable' offence for Universal Credit recipients with a history of homelessness is over-ruled. – The current easement is extended to all homeless people and those at risk of homelessness. – The homelessness easement is applied to contracted providers as well as Jobcentre Plus. – Work search requirements recognise housing related activity.	England, Scotland and Wales for all.



"I had a drug habit in my early twenties but I cleaned myself up and went to university at London Metropolitan to study social research. I was always interested in politics and I worked for a year in the House of Commons as an MP's research assistant. After that I worked for public libraries for many years and also in a local community arts centre doing event management, but we lost our funding and I got made redundant.

I was clean for about 13 years during that time, but when my son went to secondary school a few things happened that made me relapse quite badly. I had a temporary housing place with my son at the time but I was in such a deep depression that I forgot to send in the renewal application. The council didn't inform me about it for months though and I got evicted before I could do anything about it. After that my son went to live with his dad and I had to go squatting and sofa surfing.

That situation carried on for nearly the last seven years. We tried to find a rented place but even together it was impossible because you needed such a massive deposit in London...

The last place we stayed in was so depressing and dangerous I had to get out. We paid £90 a week each but we had no hot water and no heating. It would rain indoors and there was black mould everywhere. It was only a four-bedroom house but the landlord was renting it out to as many as 13 other people.

Being in that environment made my depression and drug-use so much worse... I applied to my care manager for rehab and they sent me to Plymouth. It's a long way from London, but it's better to get far away from where you're using... But I've ended up living in a city I don't really want to be living in with no one I really know.

I hope that when I complete the programme I can go back to London to work... But I don't really have anyone to live with in London... I've been here six months in a rehab but I need to be here several more before I'm eligible for the local connection that would get me into a private house, so I don't really know what to do."

Alana, Plymouth

Chapter 11:

Housing solutions to homelessness

To end homelessness, there is an urgent need for more housing that provides people on low incomes with security, decent living conditions and affordable rents.

The decline in availability of homes affordable to low income households has significantly contributed to the rise of homelessness. To stop this, housing and welfare policies must work effectively together.

More homes must be built and made available at social rent levels. And more must be done to ensure that private tenancies provide the stability that people need to prevent and move on from homelessness.

11.1 Introduction

Increasing the availability of decent housing, affordable to people on low incomes, is critical to successfully ending homelessness in Great Britain.

The output of new homes across all tenures has fallen short of the number required for many years across the UK.[1] Table 11.1 illustrates estimates of annual housing requirements for each nation and the number of new homes delivered.[2]

The Westminster Government has set a housebuilding target of 300,000 homes a year for England by the end of the current parliament.[3] The Chartered Institute of Housing (CIH) estimates that over the five years since 2011, the cumulative shortfall between the number of homes built in England and the number needed is 370,000.[4]

Gross housing undersupply is an acute problem across all three nations, but attention must also focus on housing affordability and type, and where homes are needed.[6]

The number of concealed and sharing households has risen over the last decade.[7] Sharing accommodation has become an established way of responding to housing shortage, particularly in London.[8]

And, as fewer people can afford to buy homes, and there are fewer social rented tenancies,[9] more people are renting their homes from private landlords. The proportion of people living in the private rented sector is higher in England (20%) than Scotland (15%) and Wales (15%), but is growing across Great Britain.[10]

Table 11.1 Number of new homes required per annum and provided (position in 2016/17)

Nation	Annual housing requirement (based on 2014 household projections)	Net additional homes (2016/17)
England	227,000*	217,350
Scotland	13,800	18,539
Wales	8,400	6,833

Source: The 2018 UK Housing Review.
*The scale of requirement to address backlog of need is higher. The Housing White paper suggests the requirement may be 275,000 homes a year or more, and the 2017 budget set a target of 300,000 homes a year by the end of the current parliament.[5]

1 Sarling, J. and Blyth, R. (2013) *Delivering Large Scale Housing: Unlocking Schemes and Sites to Help Meet the UK's Housing Needs.* London: RTPI.
2 Stephens, M., Perry, J. Wilcox, S., Williams, P., and Young, G. (2018) *2018 UK Housing Review.* Coventry: Chartered Institute of Housing.
3 HM Treasury (2017) *Autumn Budget 2017.* London: HM Treasury
4 Fraser, R. Perry, J., and Duggan, G. (2017) *Building Bridges.* England: CIH/VIVID/Association of Retained Council Housing.
5 Department for Communities and Local Government (2017) *Fixing our broken housing market.* London: Department for Communities and Local Government.
6 Kilroy, J. (2017) *Better Planning for Housing Affordability – Position Paper, February 2017.* RTPI; Powell, R., Dunning, R, Ferrari, E and McKee, K. (2015) *Affordable Housing Need in Scotland – Final Report September 2015.* Scotland: SGHA/CIH/Shelter Scotland.
7 Fitzpatrick, S. Pawson, H.Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2018) *The homelessness monitor: England 2018.* London: Crisis.
Fitzpatrick, S. Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2017) *The homelessness monitor: Wales 2017.* London: Crisis.
8 Padley, M. Hill, L. Hirsch, D. (2015) *Minimum budgets for single people sharing accommodation. Centre for Research in Social Policy.* Loughborough: Loughborough University.
9 The availability of social rented housing across the three nations is considered later in the chapter.
10 Ministry of Housing, Communities & Local Government (2018) *Live tables on dwelling stock (including vacants).* London: MHCLG.

In all three countries, the need and demand for low-rent housing outstrips supply. This means there has been growing reliance on expensive and sometimes unsuitable temporary accommodation (see Chapter 7 'Rapid rehousing'). Many homeless people are being helped to access private tenancies to provide settled housing.[11]

England
During 2015/16, more than 90,000 households were helped to find mainstream housing under homelessness prevention and relief measures and the main homelessness duty. Around one third were provided with a private tenancy. The rest entered social housing with the exception of a few hundred households able to afford low-cost home ownership.[12]

Private renting also provides 'move-on' housing for a significant proportion of people moving on from homelessness hostels and others outside the statutory homelessness framework. Around ten per cent of people moving on from homeless hostels moved to a private tenancy in 2015/16.[13]

Wales
In Wales, 38 per cent of the 8,880 households, obtained a private tenancy under the prevention and relief duty in 2016/17.[14]

Scotland
In Scotland, of the 22,245 unintentionally homeless households, or those threatened with homelessness, six per cent were helped into private rented sector settled housing. There is significant local variation, however. In Edinburgh, 21 per cent obtained settled private rented housing.[15]

Private rented housing can provide a sustainable housing option for people moving on from homelessness.[16] But many homeless people struggle to get access to homes let by private landlords and the sector is often not fit for purpose.[17]

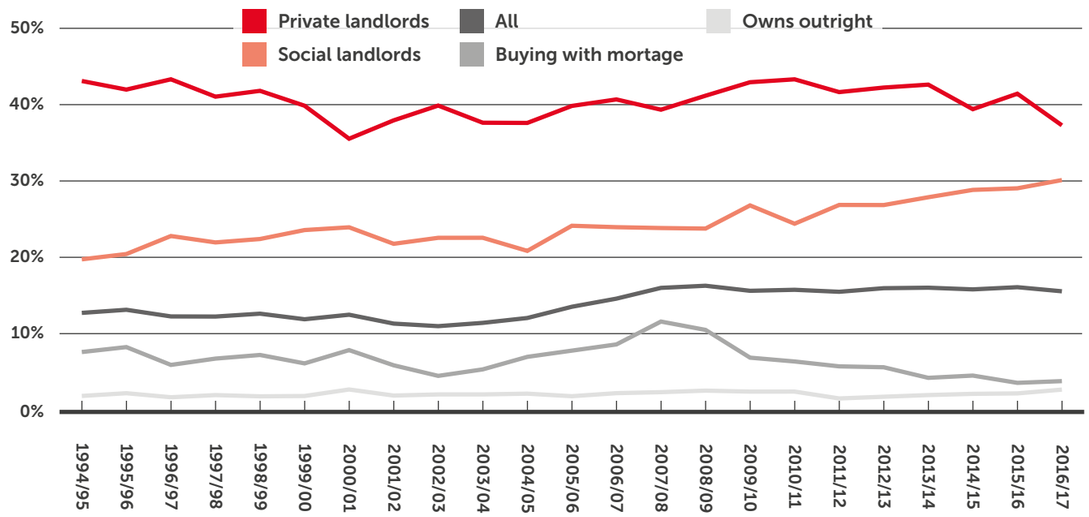
Affordability problems with private rented housing

In all three nations, increased reliance on private renting means people are spending more of their income on rent.[18] They are more likely to be pushed into poverty by the high cost of housing relative to earnings. A higher proportion of private renters of working age spend more than a third of their incomes on housing than working-age adults living in other tenures (see figure 11.1).

The number of people living in poverty in the private rented sector in the UK has nearly doubled in the past decade. In 2015/16 4.7 million people were living in poverty in the sector, three million of whom were in

11 References to "settled housing" in this chapter refer to the provision of permanent rather than temporary housing. As noted elsewhere in the chapter, this may include the provision of six to twelve month fixed term tenancies.
12 Rowe, S. and Wagstaff, T. (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis.
13 Homeless Link (2016) *Support for single homeless people in England – Annual Review 2016.* London: Homeless Link.
14 Fitzpatrick, S. Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2017) *The homelessness monitor: Wales 2017.* London: Crisis.
15 Scottish Government (2017) *Homelessness in Scotland: Annual Publication 2016/17.* Edinburgh: Scottish Government.
16 Gousy, H. (2016) *Home no less will do. Improving access to private renting for single homeless people.* London: Crisis.
17 Gousy, H. (2016) *Home no less will do. Improving access to private renting for single homeless people.* London: Crisis.
18 Tinson, A., Ayrton, C., Barker, K., Barry Born, T., Aldridge, H., Kenwayl, P. (2016) *Monitoring Poverty & Social Exclusion 2016.* York: Joseph Rowntree Foundation.

Figure 11.1 Working-age adults spending more than a third of their income on housing, by tenure



Source: Households Below Average Income, Joseph Rowntree Foundation, 2017

working households.[19]

Four fifths of low income working-age households living in the private rented sector spend more than one-third of their net income on housing costs. This is compared with just over half of those in the social rented sector.[20] Elements of welfare reform, particularly the widening gap between Local Housing Allowance rates and market rents,[21] has made the sector increasingly unaffordable. It has left private renters vulnerable to rent arrears and eviction.[22] See Chapter 10 'Making welfare work'.

Housing conditions in the private rented sector

In all three nations, the condition of housing in the private rented sector is worse than in other tenures.[23] Poor conditions tend to be concentrated at the lower-cost end of the private market, and so particularly affect homeless people.[24]

In Scotland and Wales, private landlords are obliged to join national registration schemes, but in England the private rented sector is largely unregulated.

In areas of highest housing pressure, reliance on private renting also creates opportunities for exploitation. People with the least purchasing power may be pushed into accepting very poor quality accommodation. Disreputable landlords may more readily exploit the situation, letting unsafe or overcrowded homes to people who have no choice.

Tenants are often reluctant to refer problems to their local authorities, or are unaware of their right to do so. This makes it very difficult to identify and enforce against rogue landlords.[25] Furthermore, local authorities often struggle to tackle poor conditions and standards in the sector because of a lack of resources and poor quality data on private renting.

Local authority environmental health teams are significantly under resourced. Average budgets allocated to environmental health services per head of the population in the UK fell by eight per cent between 2010 and 2012; 1,272 jobs were lost in environmental health offices.[26]

There is a lack of available data on landlords and the properties they let, particularly in England where there is no national register of landlords. This makes it very difficult for local authorities to effectively target enforcement work or educational training and resources at amateur and accidental landlords. More than three quarters of landlords in the UK have never been a member of any trade body or held any licence or accreditation.[27]

In England, there has been an increase in the use of 'permitted development' rights to deliver housing in converted office buildings (also referred to as 'change of use'),[28] sometimes to provide housing targeted at vulnerable people.[29] The number of such change of use conversions has risen dramatically since the Westminster Government introduced new powers in May 2013 (applicable only to England). There were 37,000 such conversions in 2016/17.[30]

The local planning authority has limited power to ensure these homes meet basic standards such as minimum space and adequate light and ventilation.[31] Schemes can be of poor quality and are not subject to affordable housing obligations.[32] There have been calls for government to reverse the 2013 reforms.[33]

Limited security of tenure in private rented housing

In England and Wales, the combination of reliance on short fixed-term

19 Joseph Rowntree Foundation analysis of Households at Minimum Income dataset quoted in Robson, B. (2018) *Using the Social Housing Green Paper to boost the supply of low-cost rented homes.* York: Joseph Rowntree Foundation.

20 Robson, B. (2018) *Using the Social Housing Green Paper to boost the supply of low-cost rented homes.* York: Joseph Rowntree Foundation.

21 See for example Lister, S. (2016) *Mind the gap. The growing shortfall between private rents and help with housing costs.* Coventry: Chartered Institute of Housing ; Joyce, R., Mitchell, M. and Norris Keiller, A. (2017) *The cost of housing for low income renters.* London: Institute for Fiscal Studies.

22 Clarke, C. Hamilton, C., Jones, M., and Muir, K. (2017) *Poverty, evictions and forced moves.* York: Joseph Rowntree Foundation.

23 Ministry of Housing Communities and Local Government (2017) *English Housing Survey headline report, 2016-17.* London: Ministry of Housing Communities and Local Government; Scottish Government (2017) *Scottish House Condition Survey 2016 Key Findings.* Scotland: Scottish Government; Welsh Assembly Government (2008) *Living in Wales 2008.* Wales: Welsh Government. At the time of writing this was the last full survey of housing conditions in Wales, but results for 2017/18 are due for publication later this year http://gov.wales/statistics-and-research/welsh-housing-conditions-survey/?lang=en

24 Smith, M., Albanese, F., Truder, J. (2014) *A roof over my head. The final report of the sustain project.* London: Crisis/Shelter; Shelter Cymru (2016) *Accessing and sustaining social tenancies.* Swansea: Shelter Cymru.

25 Parker, I. and Isaksen, M. (2017) *A state of disrepair. Why renters deserve a better deal.* London: Citizens Advice.

26 Unison (2012) *Environmental Health: how cuts are putting individuals and communities at risk and damaging local businesses and economies.* London: Unison.

27 Gousy, H. (2014) *Safe and decent homes.* London: Shelter.

28 Permitted development rights allow certain changes to a building (including change of use) without the need to apply for full planning permission. The rights are derived from a general planning permission granted by Parliament, rather than from permission granted by the local planning authority. Similar provisions have not been implemented in Scotland or Wales.

29 Future of London (2017) *Making the most of build to rent.* London: Future of London.

30 Stephens, M. Perry, J. Wilcox, S. Williams, P. and Young, G. (2018) *2018 UK Housing Review.* Coventry: Chartered Institute of Housing .

31 London Councils (2015) *The impact of permitted development rights for office to residential conversions. A London Councils Briefing.* London: London Councils.

32 Future of London (2017) *Making the most of build to rent.* London: Future of London.

33 Association for Public Service Excellence (2018) *Delivering affordable homes in a changing work. Ensuring councils can meet local housing need.* Manchester: Association for Public Service Excellence.

tenancies and rising rents has made more people homeless through tenancies ending. So, while private rented tenancies often provide homeless people with settled accommodation for a period of time, they can also be the cause of repeat homelessness.

The Scottish Government has introduced changes to give private renters in Scotland greater security of tenure than in England and Wales. *The Private Housing (Tenancies) (Scotland) Act (2016)* introduced a new open-ended private tenancy that can only be brought to an end under specified grounds for eviction. Except where the tenant is at fault for a breach of tenancy conditions, tenants who have lived in the property for more than six months will be entitled to 84 days' notice. This is where the landlord seeks possession on one of the specified grounds.

Increased private renting means higher spending on Housing Benefit

Reliance on the private rented sector to house homeless people and other low income households has significantly increased the cost of Housing Benefit. This is because of the higher cost of private market rents.[34] Between 2005/06 and 2014/15, Housing Benefit spending on 1.4 million private tenancies doubled to £9.3 billion.[35] During the same period the cost of Housing Benefit in the social rented sector rose by just over a fifth.

Investment in housing at social rent levels is an alternative approach that would see cost benefits both for the taxpayer and for low income households. Analysis by Savills compared the costs of housing 100,000 households in the private rented sector and social rented sector respectively.[36]

The study found that the social rented sector option generated £23.9 billion savings over the long term compared with private renting. This considered the impact of upfront investment and Housing Benefit costs. Analysis by Capital Economics found that investing in 100,000 new social rent homes per annum creates a net annual surplus for national government over the long term.[37]

Increased barriers to social housing

Social housing[38] still provides the main source of housing for homeless people who approach their local authority for help across all three nations. There is significant variation, however, in national policy on the provision of social housing in England, Scotland and Wales, and the extent to which homeless people can get access to it.

In all three nations, problems with the affordability of social housing make it harder for homeless people and others on very low incomes to access social housing.[39] This also increases the risk of rent arrears and eviction for low income households living in social housing. These problems are driven in part by the impact of reduced Housing Benefit entitlements and changes associated with the introduction of Universal Credit (see Chapter 10).

England

The effects of English housing policy have significantly reduced the supply of social rented housing available to homeless people. Particularly responsible are: disinvestment from new social rent[40] housing; home loss through right to buy; conversion of social rent homes to affordable rents[41], and greater conditionality for social housing.[42]

It has been argued these policies are changing the role of the social housing sector.[43] Instead of providing a long-term housing safety net for low income households, it is becoming an 'ambulance service' – helping those in most acute need for short periods of time.

As part of this changing role, the Westminster Government introduced reforms enabling social landlords to offer fixed-term tenancies to new tenants instead of long-term (or lifetime) secure tenancies.[44] There was, however, limited take up of this flexibility by local authorities and housing associations.[45]

So, through *The Housing and Planning Act (2016)*, the government introduced provisions (not yet implemented) to end the use of secure tenancies for most people.

Analysis for the Joseph Rowntree Foundation has found that at its best, social renting provides secure and affordable homes for low income households.[46] But the same research notes the potential of the tenure to contribute to occupants' wellbeing can be undermined by properties let in a poor state of decoration or repair.

A social rented home can provide homeless people with greater stability than the private rented sector.[47] But it is sometimes the case that social rented housing is let in a poor state of repair or decoration, and can negatively affect homeless people.[48]

In England the former national

34 Stephens, M., Perry, J., Wilcox, S., Williams, P., and Young, G. (2018) *2018 UK Housing Review.* Coventry: Chartered Institute of Housing. See explanation in Chapter 3, alongside a wider analysis of the shift from "supply side" to "demand" subsidies.

35 National Housing Federation (2016) *Briefing: The growing Housing Benefit spend in the PRS.* London: National Housing Federation.

36 Savills. (2017) *Spotlight 2017: Investing to solve the housing crisis. London*: Savills.

37 Chaloner, J., Dreisin, A., and Pragnell, M. (2015) *Building New Social Rent Homes. An Economic Appraisal* England: SHOUT/National Federation of ALMOs (as updated in *Updated Economic Appraisal 2016*.)

38 The term 'social housing' is used to describe housing belonging to and managed by social housing providers including housing associations and local authorities. The term can include 'social rent' and 'affordable rent' homes – these terms are explained further below. The term 'social housing' does not mean the same as 'affordable housing'. 'Affordable housing' is a term describing all types of housing at below market prices – and can include types of provision that are affordable only to people on above median earnings.

39 Full details are set out in a Crisis and Chartered Institute of Housing briefing (forthcoming).

40 The term 'social rent' refers to social housing subject to guideline target rents, originally set with reference to manual earnings as well as other factors.

41 The term 'affordable rent' refers to social housing at a rent of no more than 80 per cent of the local market rent. It is typically more expensive than social rent.

42 These policy changes are considered in more detail in the 'What needs to change?' and 'Recommendations' sections of this chapter.

43 In Chapter 3 of *The 2018 UK Housing Review*, John Perry and Mark Stephens provide a wider overview of 'How the purpose of social housing has changed and is changing'. Stephens, M., Perry, J., Wilcox, S., Williams, P., and Young, G. (2018) *2018 UK Housing Review.* Coventry: Chartered Institute of Housing.

44 Parkin, E and Wilson, W. (2016) *Social Housing: The ending of Lifetime tenancies in England.* London: House of Commons Library.

45 Parkin, E and Wilson, W. (2016) *Social Housing: The ending of Lifetime tenancies in England.* London: House of Commons Library.

46 Croucher, K. Quilgars, D. and Dyke, A. (2018) *Housing and life experiences: making a home on a low income.* York: Joseph Rowntree Foundation.

47 Crane, M. Joly, L. and Manthorpe, J. (2016) *Rebuilding Lives: Formerly homeless people's experiences of independent living and their longer term outcomes.* London: Kings College London. The study found a strong association between housing tenure at the time of resettlement after homelessness and subsequent housing instability/homelessness; 36 per cent of those housed in the PRS became homeless again compared with 15 per cent rehoused by local authorities and 13 per cent rehoused by housing associations.

48 Unpublished survey evidence of Crisis client services in 2017 found that the poor condition of social rented tenancies can be a barrier to accessing social renting for homeless people using Crisis services.

programme to keep homes at the Decent Homes Standard has been halted. Consequently, there are concerns that the improvement in social housing stock condition delivered between 2000 and 2010 may be reversed.[49]

In the wake of the Grenfell tragedy, the Westminster Government has announced a review of social rented housing, but the parameters of the review have not yet been clarified.[50]

Scotland
In Scotland there is a strong commitment to grow the stock of social rented housing, supported by the abolition of right to buy. Recent evidence suggests that the Scottish Government's ambitious delivery targets should be achievable.[51] But, there are concerns about affordability for tenants,[52] whether development plans will deliver the right homes in the right places, and about the future of the programme after 2021.

Wales
The Welsh Government is committed to delivering more social rented housing and preserving the existing stock with the abolition of right to buy. There is an acknowledged need to increase the pace of delivery.[53] There are, however, concerns about the affordability of social rented housing, and the barriers faced by low income households seeking access to social renting.[54]

Further evidence on each of these issues is detailed later in this chapter.

11.2 How many homes are needed?

Current backlog of homes

Crisis and the National Housing Federation have commissioned Heriot-Watt University to undertake a new analysis of housing supply requirements.[55] The evidence in this section is all based on this study.

There is currently a backlog of need of 4.75 million households across Great Britain. The majority of these households consist of those identified as in housing need using the following definition calculated through the Understanding Society survey data:

- concealed family or concealed single (including nondependent children) wanting to move
- overcrowding (bedroom standard)
- serious affordability problems based on combination of ratio measures and subjective payment difficulties
- serious self-reported physical condition problems
- accommodation unsuitable for families (e.g high-rise, no garden/ yard).

The figures in this group have been identified by measuring those households who experienced any one or more of these problems either in the current year or the previous year. This accounts for 13.8 per cent of all households in the current year (which has been used in the calculation in table 11.2)[56] or 20.9 per cent in the current or previous year.[57] This data set does not take account of older households with suitability needs and a further 250,000 households fall into this category and have been added to the total backlog of need.

Added to this figure are components of Heriot-Watt's analysis on core and wider homelessness (see Chapter 5 'Homelessness projections'). A further 330,000 households[58] are added to the total. They are comprised of those who are rough sleeping, living in cars, tents and public transport, hostels, sofa surfing, squatting, living in non-residential buildings, or living unsuitable temporary accommodation. This number also includes those leaving institutions such as prisons and hospitals, and non-permanent private renters (allowing for double counting).

Another component of the backlog of need are those households whose housing costs are unaffordable. This is even though they may not be identified in the specific needs above (ie those paying more than our norm ratios but not indicating actual immediate difficulties with payment). A broad indicator of this problem would be households in poverty 'After Housing Costs' on the standard UK measure of 60 per cent of the median income. This equates to 17.3 per cent of households across Great Britain. There are an additional 240,000 under-40 households living in the private rented sector (over and above those already counted as in need) who cannot afford it, according to our affordability criteria, and who should be able to access social housing. There are also another 75,000 who could afford intermediate affordable rents. The equivalent numbers from the older age groups may be of a similar order of magnitude, adding up to 0.51 million households in total.

Number of homes needed

These housing needs cannot be met instantaneously. It will take time to build up an effective housebuilding programme to address these existing needs plus expected future needs and demands. Heriot-Watt's analysis assumes housebuilding will take place over 15 years to allow sufficient time and resources to meet the backlog of need set out above. Over the 15-year period the total level of new housebuilding required is estimated at 383,000 units per year including 100,500 units per year for social rent. Table 11.3 sets out how this splits out across England, Scotland and Wales. The figures in this table take account of the analysis of need and affordability and a balanced assessment of the range of outcomes forecast in the model. This includes regional equity, reasonable chances of rehousing for households in need, and potential issues of low demand which affect some areas, particularly Scotland.

Number of new homes needed to address homelessness

As this chapter highlights, homeless people face increased barriers to accessing social housing and part of the issue is insufficient stock and new supply to meet the growing need. Heriot-Watt's analysis shows that the net flow of households experiencing core homelessness in 2016 was 267,000 in England. The number of new social housing lets to all tenants was only 136,000, showing how much demand outstrips supply.

49 Stephens, M.Perry, J. Wilcox, S. Williams, P., and Young, G. (2018) *2018 UK Housing Review.* Coventry: CIH Chartered Institute of Housing.
50 Ministry of Housing, Communities and Local Government (2017) *Sajid Javid's speech to the National Housing Federation conference 2017.* 19th September. https://www.gov.uk/government/speeches/sajid-javids-speech-to-the-national-housing-federation-conference-2017
51 Young, G. and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing.* Scotland: SFHA/Equality and Human Rights Commission/Shelter Scotland.
52 Full details are set out in a Crisis and Chartered Institute of Housing briefing (forthcoming).
53 Pollock, I. (2018) *Housing 'crisis': Shelter Cymru urges investment.* BBC Newsonline http://www.bbc.co.uk/news/uk-wales-43476298
54 Campbell, J. Golten, A., Jackson, R., and Evans, R. (2016) *Accessing and sustaining social tenancies: exploring barriers to homelessness prevention.* Swansea: Shelter Cymru.
55 Bramley, G. (forthcoming) *Housing supply requirements across Great Britain for low income households and homeless people.* London: Crisis and the National Housing Federation.
56 It should be noted that this definition differs in some respects from that used in Bramley et al (2010), based on S.E.H. data and used within the SRHMM; that definition covered a lower proportion of households, 9.2 per cent, due to a narrower definition of concealed households and the exclusion of physical condition problems. The definition of concealed households is similar to that used in the Crisis Homelessness Monitor.
57 Being in need in previous year is counted when analysing newly forming households.
58 These are additional because they are not generally measured within conventional household surveys.

Table 11.2 Back-log of housing need in Great Britain

Type of housing need/requirement	Number of households in GB (million)
Housing need including: • Concealed family or concealed single (including nondependent children) wanting to move • Overcrowding (bedroom standard) • Serious affordability problems based on combination of ratio measures and subjective payment difficulties • Serious self-reported physical condition problems • Accommodation unsuitable for families (eg high-rise, no garden/yard)	3.66
Core and wider homelessness	0.33
Older households with suitability needs	0.25
Households whose housing costs are unaffordable	0.51
Total	**4.75**

Source: Bramley, G. (forthcoming) Housing supply requirements across Great Britain for low income households and homeless people.

If the suggested housebuilding scenario in table 11.3 is achieved, by the end of the 15-year period there would be 274,000 new lettings in social housing. With a flow of 160,000 core homeless households during that year.

Therefore, building a lot more social housing makes it much more possible for homeless household to be rehoused in social rented housing where this is most appropriate.[59] It also contributes to a wider programme which will help to prevent and reduce homelessness by providing more housing opportunities and better affordability in the market in general.

11.3 What needs to change?

Advocating a mixed economy approach

We advocate a range of interventions to provide a sufficient supply of housing for homeless people across Great Britain. In England, this includes significantly increased national and local government investment in housing at social rent levels to meet identified housing requirements. In Scotland, it means maintaining and effectively targeting investment in the longer term to meet identified needs. In Wales, it means continuing to grow and effectively target the investment already committed.

While investment programmes are rolled out, ethically-minded private landlords and institutional investors across Great Britain should play a greater role in providing homes for

59 Experience in Scotland suggests that, with a favourable supply scenario and a relatively inclusive homelessness regime, the proportion of statutory homeless applicants actually rehoused in social renting is about 61 per cent.

Table 11.3 Target house-building numbers by tenure and country, 2016-31

Country	Total dwellings	Private sector	Social rent	Shared ownership	Intermediate rent	All affordable
England	343,000	194,798	91,000	27,300	29,902	148,202
Wales	14,000	7,500	4,000	1,000	1,500	6,500
Scotland	26,000	16,000	5,500	2,500	2,000	10,000
GB total	**383,000**	**218,298**	**100,500**	**30,800**	**33,402**	**164,702**

Source: Bramley, G. (forthcoming) Housing supply requirements across Great Britain for low income households and homeless people. (All figures rounded to the nearest thousand)

homeless people. This should include provision in both the new build (build-to-rent)[60] and buy-to-let[61] sectors, and making effective use of private rented sector access (help to rent) schemes.

There is significant variation in house prices, affordability and development economics across each nation's housing markets.[62] So interventions to tackle homelessness must be shaped by local market conditions, and respond to the varying levels of what people need. They should also be underpinned by a welfare system that ensures Housing Benefit is available to meet the costs of renting in both the social and private rented sectors.

Across all three nations, the lack of affordable housing was identified as the biggest barrier to relieving homelessness in the extensive national consultation we undertook to inform this plan.[63] Greater availability of social housing was identified as the most important resource needed to help local authorities meet the needs of people who are homeless or at risk of homelessness. This was also a key issue raised by consultation participants with lived experience of homelessness.[64]

Social renting

England

In England, there is no national target for building homes at social rent levels. Government policy since 2012 has resulted in a significant reduction in the number of homes for social rent. New build targets have instead focused on overall housing supply, and on a broadly defined category of 'affordable homes' that includes starter homes.

Only London has a target for the delivery of new homes at rents based on social rent levels. This follows the Mayor of London's decision to include a funding stream for homes at rent levels equivalent to target rents for social housing. These rents are referred to as 'London Affordable Rent'.

The government's announcement of an additional £2 billion to fund delivery of up to 25,000 social rent homes over five years is welcome. However this will not make up for the decrease in provision of additional social rented homes from a high of 40,000 in 2010/11 to just 5,000 in 2016/17. And since 2012, 150,000 social rent homes have been lost through conversions to affordable rent, right to buy and demolition.[65]

60 Build to rent is used throughout to describe the provision of purpose-built housing for rent as part of developments with professional, often onsite management, and longer (three year plus) tenancies.
61 Buy to let is a term used throughout to describe homes let by private individuals, whether purchased with a buy to let mortgage or other sources of finance.
62 Baxter, D., and Murphy, L. (2017) *Priced Out? Affordable Housing in England.* London: IPPR.
63 Hughes, N. (2018) *Have your say policy consultation: summary report.* London: Crisis.
64 Crisis, Groundswell and uscreates (2018) *The lived experience of homelessness.* London: Crisis.
65 CIH (2018) *More than 150,000 homes for social rent lost in just five years, new analysis reveals.* http://www.cih.org/news-article/display/vpathDCR/templatedata/cih/news-article/data/More_than_150000_homes_for_social_rent_lost_in_just_five_years_new_analysis_reveals

Social housing has been subject to a one per cent annual rent cut between 2016 and 2020. This reduced the amount of money available to social landlords, and as a result is estimated to have resulted in the construction of 14,000 fewer affordable homes.[66] While local authority new build housing completions are rising, the total output was in the region of only 2,000 homes in 2016/17 (not just homes for social rent).[67] The number of lettings to new tenants has declined over the past two decades, and the proportion of lettings to homeless people has fluctuated at around a fifth. Increasing the supply of social rented homes in England is central to long-term planning to end homelessness. In section 11.4 we propose that the Westminster Government sets targets for and invests in substantial increases in the delivery of social rented housing. Policies that have resulted in sustained reductions in the stock of homes at social rent levels must be reversed. The barriers that further limit homeless people's ability to access social rented housing must also be addressed.

Scotland

Scotland has committed to deliver 35,000 social rented homes between 2016 and 2021. A £3 billion investment programme underpins the commitment.[68]

A 2018 review of strategic investment plans for affordable housing suggests that this target is likely to be achieved.[69] It projects that 78 per cent of new affordable homes will be for social rent.

Combined with the effect of abolishing the right to buy, the same review found that this programme should produce the first significant and sustained increase in the number of socially rented homes since 1981. However, the review highlights that investment plans could be more effectively targetted to address varying local needs. In some areas the replacement of obsolete homes or refurbishment of existing stock is a greater priority than building new social rent homes. The review cautions against viewing the programme purely in terms of its capacity to deliver additional homes.

The same review highlights concerns about whether the allocation of Affordable Housing Supply Programme Funds between areas in Scotland ensures the right homes are being built in the right places.[70]

Scottish local authorities delivered around a quarter of social rent homes in the 2011-2016 programme.[71] This reflects greater flexibility on borrowing and rent setting than is the case in England. Two fifths of social lettings to new tenants (40%) in Scotland were allocated to homeless people in 2016/17. This is a far higher proportion than in England or Wales. Despite this, homeless people still sometimes face affordability barriers to accessing social housing in Scotland.[72]

Wales

In Wales £1.5 billion is allocated to deliver 20,000 new affordable homes between 2016 and 2021, of which 65 per cent will be for rent (equivalent to 2,600 homes a year).[73] This doubles the Welsh Government's previous 10,000 homes target which was exceeded by 15 per cent.

Local authorities are likely to have a small role in delivering social rented homes. There is a target of 1,000 homes over the current Assembly term. The right to buy is being abolished in Wales, as in Scotland. Concerns have been raised, however, about the sector's ability to meet affordable housing targets. The Welsh Government has launched an independent review to address the need for further reforms.[74]

66 Office for Budget Responsibility (2015) *Economic and Fiscal Outlook.* CM9088. London: Office for Budget Responsibility.
67 Ministry of Housing Communities and Local Government (2018) *Live tables on housebuilding: new build dwellings. Table 209.* London: Ministry of Housing Communities and Local Government.

68 Scottish Government (2018) More homes. (https://beta.gov.scot/policies/more-homes/affordable-housing-supply/
69 Young, G. and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing.* Edinburgh: Shelter Scotland
70 This conclusion draws on a comparison of allocations with the estimated need for additional affordable homes calculated in the 2015 analysis of housing requirements in Powell, R., Dunning, R., Ferrari, E., and McKee, K. (2016) *Affordable Housing Need in Scotland: Final Report – September 2015.* Edinburgh: Shelter Scotland. The authors note that limitations with data on targets and needs make it difficult to provide a definitive answer, but highlight concerns that an insufficient share of funding may be being directed towards local authorities assessed as having the greatest social housing requirement.
71 Stephens, M. Perry, J. Wilcox, S. Williams, P. and Young, G. (2018) *2018 UK Housing Review.* England: CIH.
72 Full details are set out in a Crisis and Chartered Institute of Housing briefing (forthcoming).
73 Welsh Government (2016) *£30 million and new housing supply pact to deliver 20,000 homes.* 1st December. https://gov.wales/newsroom/housing-and-regeneration/2016/30-million-and-new-housing-supply-pact-to-deliver-20000-homes/?lang=en
74 Welsh Government (2018) *Review of affordable housing supply in Wales announced by Minister* http://gov.wales/newsroom/housing-andregeneration/2018/180423-review-of-affordable-housing-supply-in-walesannounced-by-minister/?lang=en

While there is a strong policy commitment to increasing the supply of social renting in Wales, fewer than a fifth of new social lettings are to homeless people. Homeless people still face affordability barriers to accessing social housing in Wales.[75]

A continued role for an improved private rented sector

All three nations also need interventions to help homeless people get access to stable, private rented tenancies. This means tackling the lack of tenure security that characterises private renting in England and Wales, and tackling poor conditions and unaffordable rent increases in all three nations.

Help to rent schemes and social lettings agencies can help increase homeless people's access to private rented tenancies and support them in sustaining them too.[76] More can be done to increase the role of such schemes across all three nations. More can also be done to improve homeless people's access to private renting in both the buy to let market and the emerging build to rent sector – particularly socially-minded versions of this.

We include proposals on these issues later in the chapter.

Solutions tailored to market conditions and needs

What needs to be done to increase the availability of housing for homeless people varies in different housing markets in each nation.

The Commission for Housing in the North (of England) highlights the need for investment to restructure housing that is no longer fit for purpose in underperforming and unpopular areas.[77]

Crisis services operating in the Midlands, the North of England and in parts of Scotland and Wales report that while it is possible for single homeless people to access social rented housing, it can be in locations that make it hard for people to find and get to work or training. Aligning housing investment programmes with employment, industrial and transport strategies is essential to underpin national and local strategies to tackle homelessness.

Increasing affordable housing supply – the wider solutions

Wider solutions to the problem of too few homes provide the context for our recommendations on housing solutions to homelessness. It is not within the scope of the plan to recommend wider land supply, planning and housing investment reforms. However, it is clear that such reforms are essential to increase the supply of affordable homes.

This section of the plan highlights four key areas where reform is needed.

- Increasing the supply of land for affordable housing.
- Maximising developer contributions to affordable housing.
- Diversifying housing delivery to increase supply.
- Making use of empty or obsolete homes and other buildings.

75 Full details are set out in a Crisis and Chartered Institute of Housing briefing (forthcoming).
76 Rugg, J. (2014) Crisis Private Rented Sector Access Development Programme: Year Two to April 2013. York: University of York.
77 Northern Housing Consortium (2016) *A New Framework for Housing in the North.* England: Northern Housing Consortium.

Increasing the supply of land for affordable housing

Housing providers from all three nations participating in a roundtable discussion convened by Crisis to inform this plan, said the operation of the land market is a significant barrier to more affordable housing provision.[78]

In England and Wales this is caused by the way that both private and public land are brought forward for development.

Private land

Landowners typically hold out for the highest price for their land. The current system enables developers to pay more for land by reducing other costs. For example, they can reduce the size of homes or the amount of affordable housing.[79]

This creates a vicious cycle. Landowners' expectations of a high sales price, sometimes referred to as 'hope value', have tended to drive up land values and drive down build quality, space standards, infrastructure contributions and the contribution that market-led development makes to the delivery of affordable homes.[80] It also means higher affordable housing grant rates are needed to meet rising land costs.

Shelter and others have called for reforms to make land available on a larger scale and at lower values to deliver genuinely affordable housing.[81] Proposed reforms include introducing a fairer way of valuing land for housing development, and making greater use of development corporations and compulsory purchase powers to deliver new homes.

The 'New Civic Housebuilding' proposals developed by Shelter provide a model for reform.[82] They use the successes from historic examples such as the original Garden City model. Community Land Trusts (CLTs) [83] can also hold the value of land for the benefit of the community, and enable the delivery of affordable homes and workspaces.[84]

Public land

Housing providers have called for better use of public land to enable affordable housing.[85] But pressures on budgets mean local authorities and other public bodies can be less inclined to accept lower land values in return for more affordable homes.

The CIH is among those urging public bodies to allow sale of land at less than full market value to deliver affordable homes.[86] It also calls on government

78 Crisis (2018) *Innovating to increase the supply of permanent mainstream housing for homeless people: Summary of roundtable discussion on 14th February.* London: Crisis.
79 Jefferys, P., Lloyd, T., Argyle, A,. Sarling, J., Crosby, J. and Bibby, J. (2014) *Building the homes we need.* KPMG/Shelter http://england.shelter.org.uk/__data/assets/pdf_file/0010/802567/Building_the_homes_we_need_digital_copy.pdf
80 Jeffreys, P. and Lloyd, T (2017) *New Civic Housebuilding*. England: Shelter.
81 Jeffreys, P. and Lloyd, T (2017) *New Civic Housebuilding.* England: Shelter; Fraser, R., Perry, J., and Duggan, G. (2017) *Building Bridges.* England: CIH/VIVID/Association of Retained Council Housing; Stephens, M., Perry, J., Wilcox, S., Williams, P., and Young, G. (2018) *2018 UK Housing Review.* England: Chartered Institute of Housing.
82 Jeffreys, P. and Lloyd, T. (2017) *New Civic Housebuilding*. England: Shelter.
83 Community Land Trusts (CLTs) are not for profit community-based organisations, run by volunteers, to hold and manage land, and enable the development of housing for low cost sale or rent. The CLT retains the value of the land for community benefit. Some CLTs provide other facilities such as workshops to provide benefit to the local community. CLTs are owned and controlled by the community. If housing for rent is provided on CLT land, it is often leased to or managed by a housing association. The CLT model is defined in law by *The Housing and Regeneration Act (2008)*. The role of community-led housing in increasing affordable housing supply is discussed further below.
84 Heywood, A. (2016) *Local housing, community living: prospects for scaling up and scaling out community-led housing.* London: Smith Institute.
85 Crisis (2018) *Innovating to increase the supply of permanent mainstream housing for homeless people: Summary of roundtable discussion on 14th February.* London: Crisis.
86 Fraser, R. Perry, J. and Duggan, G. (2017) *Building Bridges.* England: CIH/VIVID/Association of Retained

to broaden the scope of what can determine 'best consideration' for land sales, where this will provide affordable housing.[87]

Local authorities are also being encouraged to adopt the best practice of exemplar local authorities, and be more active in assembling sites and commissioning masterplans, and using compulsory purchase order powers to do so.[88]

In Scotland, land supply is considered a key risk to the achievement of the government's ambitious affordable housing targets.[89] Council-owned land plays a major role in affordable housing delivery – but there are concerns that the supply pipeline is short-term.

As in England and Wales, there are issues around landowners' expectations being out of line with market prices, resulting in sites being held back.[90] Scottish local authorities are also relying more heavily on developer contributions to deliver affordable housing. There are concerns about the potential impact of market volatility on the rate at which new homes are built.[91]

Maximising developer contributions to affordable housing

The planning system allows local authorities to seek a proportion of affordable homes on new housing developments through legal agreements. These are known as section 106 agreements in England and Wales and section 75 agreements in Scotland.[92]

The effectiveness of section 106 in delivering affordable housing has been undermined in part by changes to the English National Planning Policy Framework in 2012.[93]

Between 2007/08 and 2011/12, section 106 delivered an average of 27,000 affordable homes a year. But between 2012/13 and 2015/16, after changes to the planning system, this fell to an average of 17,000 homes.[94]

The Westminster Government has been urged to close what Shelter has called the 'viability loophole'.[95] This is the process where developers argue that they cannot deliver the amount of affordable housing stipulated in local planning policies because their costs (including land price) do not allow enough profit.

Under the current interpretation of planning policy, higher land costs squeeze out provision for affordable housing. Associated concerns include that developers' profit assumptions have risen from a typical 14 per cent before the 2008 crash to 20 per cent. These assessments are often not available for public scrutiny.

A growing proportion of new housing development in England has been delivered by converting commercial buildings for residential use; 17 per cent of additional homes in 2016/17.[96] In England, these schemes are not subject to section 106 requirements. This further undermines new developments' contributions to meeting affordable housing need.

National governments in England and Wales have acknowledged weaknesses with the section 106 process and are developing proposals to address them. There are concerns, however, that the Westminster Government's reform measures do not provide local planning authorities with the tools to ensure section 106 obligations can always be enforced.[97]

In Wales, the role of developer contributions will be addressed through an independent review examining changes needed to increase affordable housing supply in Wales.[98]

Concerns have also been raised about increased reliance on section 75 contributions to meet affordable housing need in Scotland. Plans for reform are being considered alongside the introduction of a new infrastructure levy (see text box – 'National government strategies to tackle housing undersupply' on page 295).

Diversifying housing delivery to increase supply

Governments in all three nations have acknowledged the need to increase the range of types of agency involved in building new homes to boost housing supply.

Governments are also exploring the use of new ways of building housing – for example using 'Modern Methods of Construction' (MMC) – to help increase the number of homes built each year. We look at the likely impact of these approaches on the supply of homes for homeless people and other low income households below.

Local authority house building

Until the late 1970s local authorities had a much more significant role in house building. They regularly built around 100,000 homes a year. Changes in policy and funding in the 1980s meant a dramatic fall in local authority house building. While councils are starting to build more homes again, the scale of delivery is very limited.[99]

In England there have been calls for caps on local authority borrowing to be lifted to enable them to build more homes for social rent.[100] Because

Council Housing.

87 Fraser, R. Perry, J. and Duggan, G. (2017) *Building Bridges.* England: CIH/VIVID/Association of Retained Council Housing.

88 Fraser, R. Perry, J. and Duggan, G. (2017) *Building Bridges.* England: CIH/VIVID/Association of Retained Council Housing.

89 Young, G. and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing.* Scotland: SFHA/Equality and Human Rights Commission/Shelter Scotland.

90 Young, G. and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing.* Scotland: SFHA/Equality and Human Rights Commission/Shelter Scotland.

91 Young, G. and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing.* Scotland: SFHA/Equality and Human Rights Commission/Shelter Scotland.

92 This refers to Section 106 of the *Town and Country Planning Act (1990)* and Section 75 of the *Town and Country Planning (Scotland Act (1997).* Planning obligations are legal agreements made between local planning authorities and developers to secure the sale of a proportion of homes on a development to housing associations (for provision of affordable homes) and the provision infrastructure associated with a new development.

93 Sayce, S. Crosby, N. Garside, P., Harris, R., and Parsa, A. (2017) *Viability and the Planning System. The Relationship between Economic Viability Testing, Land Values and Affordable Housing in London.* England: Kingston University/Reading University/RAU/Ramidus.

94 Shelter (2018) *Shelter Briefing: Draft National Planning Policy Framework. London*: Shelter.

95 Grayston, R. (2017) *Slipping through the loophole. How viability assessments are reducing affordable housing supply in England. London*: Shelter.

96 Stephens, M. Perry, J. Wilcox, S., Williams, P. and Young, G. (2018) *2018 UK Housing Review.* England: Chartered Institute Of Housing. Table 2.2.1.

97 Perry, J. (2018) 'Developers are skimping on low cost housing. Time to get tough.' *Guardian Housing Network.* 19th March. https://www.theguardian.com/housing-network/2018/mar/19/affordablehomes-low-cost-rent-uk-planning-policy-government-developers?CMP=ema-1703andCMP=

98 Welsh Government (2018) *Review of affordable housing supply in Wales announced by Minister* http://gov.wales/newsroom/housing-andregeneration/2018/180423-review-of-affordable-housing-supply-in-walesannounced-by-minister/?lang=en

99 Ministry for Housing, Communities and Local Government (2018) *Live Tables on Housebuilding: new build dwellings. Table 209 – Permanent dwellings completed by tenure and country.* London: Ministry for Housing, Communities and Local Government.

100 TCPA and Nationwide Foundation (2017) *How can councils secure the delivery of more affordable homes? New models, partnerships and innovations* England: TCPA and Nationwide Foundation; Association of Retained Council Housing (ARCH)/National Federation of ALMOs (2017) *Raising the Roof – Analysis of Housing Revenue Account Headroom* England: Association of Retained Council Housing (ARCH)/National Federation of ALMOs; Fraser, R. Perry, J. and Duggan, G. (2017) *Building Bridges.* England: CIH/VIVID/Association of Retained Council Housing.

of the caps, many English local authorities have established local housing companies and partnerships enabling them to build homes outside the borrowing restrictions that restrict the construction of social rented homes.[101] Some local housing companies buy property on the open market and provide homes for private rent.[102]

There is evidence that some local housing companies are delivering a small proportion of new homes at social rent (or broadly equivalent) levels aimed at homeless people and others on the lowest incomes.[103] But the same evidence suggests that schemes more often provide intermediate or market rent homes aimed at people on median earnings or above. Some have expressed concerns that local housing companies use up council land that might have produced 100 per cent social rented housing if used in other ways.[104]

The emerging local housing company sector is thought to be capable at present of delivering an additional 2,000-3,000 homes (of all tenures) per annum.[105] It may have the capacity to increase this to an additional 25,000 homes over five years.[106]

Housing associations participating in a roundtable discussion informing this plan, raised concerns that local authorities and development companies are increasingly 'land banking' – holding on to – the types of sites once available to them. We were told it is becoming harder for housing associations and charities who provide homes directly for homeless people and others on low incomes to get access to land.[107]

In Wales, local authorities have built very few homes in recent years, but output is expected to grow, with councils committing to deliver 1,000 affordable homes over the current Assembly term.[108] In Scotland, local authorities have a more significant role in providing affordable housing; and they have built around 1,000 new homes in each of the past five years.[109]

101 Morphet, J. and Clifford, B., (2017) *Local authority direct provision of housing.* England: UCL, RTPI, National Planning Forum; Perry, J. (2015) "Should councils borrow to build houses that aren't for social rent" in Public Finance. 2 Feb. https://www.publicfinance.co.uk/2015/02/should-councils-borrow-to-build-houses-that-arent-for-social-rent

102 Power, A., Berlotti, A., Lane, L. and Provan, B. (2018) *Private Renting: can social landlords help?* London: LSE Housing and Communities; House of Commons, Housing Communities and Local Government Committee, (2018) *Private Rented Sector Fourth Report of Session 2017-19.* London: House of Commons.

103 Frazer, R. (2017) "*Local Housing Companies: opportunities and concerns*", in Red Brick 15th December.; Hackett, P., (2017) *Delivering the renaissance in council-built homes: the rise of local housing companies. London: The Smith Institute*

104 Perry, J. (2015) "Should councils borrow to build houses that aren't for socialrent" in *Public Finance* 2 Feb https://www.publicfinance.co.uk/2015/02/shouldcouncils-borrow-to-build-houses-that-arent-for-social-rent Frazer, R. (2017) "*Local Housing Companies: opportunities and concerns*", in Red Brick 15th December.

105 Morphet, J. and Clifford, B. (2017) *Local authority direct provision of housing.* England: UCL, RTPI, National Planning Forum; Hackett, P., (2017) *Delivering the renaissance in council-built homes: the rise of local housing companies.* London: The Smith Institute

106 Frazer, R. (2017) "*Local Housing Companies: opportunities and concerns*", in Red Brick. 15th December; Fraser, R. Perry, J. and Duggan, G. (2017) *Building Bridges.* England: CIH/VIVID/Association of Retained Council Housing.

107 Crisis (2018) *Innovating to increase the supply of permanent mainstream housing for homeless people: Summary of roundtable discussion on 14th February 2018.* London: Crisis.

108 Stephens, M. Perry, J., Wilcox, S., Williams, P., and Young, G. (2018) *2018 UK Housing Review.* England: Chartered Institute of Housing.

109 Stephens, M. Perry, J., Wilcox, S., Williams, P., and Young, G. (2018) *2018 UK Housing Review.* England: Chartered Institute of Housing.

Housing association delivery of homes for market rent and sale

Wider changes in practice are also altering the profile of housing development, including increased involvement by housing associations in providing housing for sale and rent.[110] Housing associations are now providing homes for market rent, homes for sub-market rents without government funding, and intermediate rental homes funded through affordable housing programmes.[111]

People targeted for sub-market rent homes are those who cannot afford to rent at usual market rents, but are unlikely to qualify for social housing.[112] Research suggests that housing association (and local authority) involvement in market renting can help raise standards in the private rented sector, and generate a source of funding – a cross subsidy – for social renting. But overall it has had a limited direct impact in increasing the supply of homes affordable to homeless people.[113]

Build to rent

Across the UK there are around 19,000 build to rent homes.[114] A further 27,500 are under construction; there are also 8,500 planning permissions.[115] Housing associations are among the largest developers of build to rent housing in England.[116] In 2017, the Scottish Government launched a Rental Income Guarantee to support increased investment in build to rent housing.[117]

The management arrangements typical of build to rent schemes mean that all tenants can receive the same level of service regardless of whether they live in market or affordable rent homes. This means genuinely mixed-income communities can be created using a cross subsidy model.

However, build to rent developments are not typically required to provide housing for the lowest earners. Also, even though they are classed as 'affordable', tenants are still expected to meet the standard market requirements for deposits and rent in advance. This means build to rent homes are less accessible to households on the lowest earnings, and are unlikely to be available to households moving on from homelessness.

A build to rent scheme intended to offer affordable housing for people who may need Housing Benefit to meet the cost of their rent is described below.

Chesterfield House, Wembley, London Borough of Brent[118]

This build to rent scheme will provide 239 homes to be completed by 2019.

110 Power, A. Berlotti, A., Lane, L., and Provan, B. (2018) *Private renting: Can social landlords help? CASE Report 113.* London: LSE Housing and Communities.

111 Power, A. Berlotti, A., Lane, L., and Provan, B. (2018) *Private renting: Can social landlords help? CASE Report 113.* London: LSE Housing and Communities.

112 Power, A. Berlotti, A., Lane, L., and Provan, B. (2018) *Private renting: Can social landlords help? CASE Report 113.* London: LSE Housing and Communities.

113 Power, A., Berlotti, A., Lane, L., and Provan, B. (2018) *Private renting: Can social landlords help? CASE Report 113.* London: LSE Housing and Communities.

114 Statistics from British Property Federation (2018) BPF BUILD TO RENT MAP OF THE UK. http://www.bpf.org.uk/what-we-do/bpf-build-rent-map-uk accessed February 2018.

115 British Property Federation (2018) BPF BUILD TO RENT MAP OF THE UK. http://www.bpf.org.uk/what-we-do/bpf-build-rent-map-uk accessed February 2018.

116 Long, S. (2018) *Quarterly Analysis: BTR. Build to Rent, February 2018.* London: Molior London.

117 Homes for Scotland/Scottish Government (2017) *The Build to Rent Opportunity in Scotland.* Scotland: Homes for Scotland/Scottish Government

118 Case study example provided in London Councils/London First/Turley (2017) *Everything you need to know about build to rent in London.* London: London Councils/London First/Turley page 12; Section 106 agreement accessed via London Borough of Brent planning documents webpage. https://pa.brent.gov.uk/online-applications/ Reference: 17/2592

In addition to homes at market rents, the scheme will provide 35 homes at 80 per cent market rent and 33 at Local Housing Allowance rate (or 70 per cent market rent), whichever is the lower. The section 106 agreement for the site sets out options for the management of the Local Housing Allowance rate housing. This includes an option that the local authority nominates households to the Local Housing Allowance rate homes to enable it to discharge its statutory housing duties into the dwellings in perpetuity.

Community-led housing
The community-led sector has potential to provide housing solutions for homeless people.

Community-led housing
Community-led housing describes housing that meets the needs of a local community or group of people. It is commissioned, built, owned or managed by residents themselves or by a not-for-profit agency representing residents or the wider local community. This broad definition can include the following.

- Community Land Trusts (CLTs) – not-for-profit community-controlled organisations, run by volunteers, to hold and manage land, and enable the development of housing for low cost sale or rent. Some CLTs provide other facilities such as workshops that can be used by the local community.
- Co-operative housing organisations (also called housing co-ops) – democratic community membership organisations that use a range of mutual structures to deliver housing for rent and sometimes for mutual home ownership.
- Co-housing projects – created and run by residents who jointly manage their community and share activities.
- Self-help housing – a broad term used to describe a range of different models of community organisation. It is often linked to bringing empty homes back into use and sometimes building new homes alongside the creation of training and employment opportunities.

In Scotland, community-led may also typically refer to community-led housing associations.

Community-led housing has expanded over the last decade and delivers around 400 additional homes a year in England.[119] The Smith Institute's review of community-led provision noted the benefits of involving local people to produce homes and neighbourhoods marked by quality, innovation and sustainability.[120]

There are 225 CLTs providing around 532 homes in England and Wales, with plans to develop 3,000 homes by 2020.[121] The Smith Institute analysis found that in England, co-housing and self-help groups provide around 3,000 homes. The number of homes owned by housing co-operatives is far greater, at around 170,000.[122]

Scotland has a well-established co-operative housing network. National government funding is available for affordable homes delivered by community-led organisations.[123] *The Community Empowerment (Scotland) Act (2015)* provides communities with rights to acquire and develop land.[124]

The Welsh Government has sought to encourage the growth of housing co-operatives. It provides funding to support 'pioneer' schemes.[125]

The Westminster Government also makes funding available to support the expansion of the community-led housing sector.[126] There have been calls for existing programmes of government support for community-led housing to be expanded to encourage more CLTs in urban areas.[127]

Modern Methods of Construction (MMC)
National governments are also responding to calls to increase the role of MMC. This housing production approach seeks to rapidly increase supply through technical innovations that can improve the form, quality and sustainability of new housing.[128]

The potential role of MMC to boost supply has been recognised for some time; there are examples of MMC construction delivering good quality homes for homeless people.[129] Models such as Y-cube (see below) offer scope to increase the pace of housing delivery targeted at low income households and homeless people. Where relevant it can be an effective way of bringing small and temporary[130] sites into use.

Y-cube [131]
Developed by Architects Rogers Stirk Harbour + Partners, the YMCA and Aecom, Y-cube was piloted in the London Borough of Merton. The scheme provides self-contained one-bedroom flats for 36 people nominated by YMCA and Merton Council with rents at 65 per cent of local market rates. The build cost was £33,000 per cube to deliver a 26sqm internal living space; with on-site costs the total build price was £50,000. The construction period was 5.5 months. The properties have a life of 60 years; long enough for use as permanent housing. They can also be moved, providing opportunities to use them as an interim housing solution on temporary sites.

The Y-cube development provided self-contained flats smaller than the Westminster Government's nationally described space standards[132] for one-bedroom flats. This was considered justifiable on a variety of grounds relating to the quality of the development.

119 Heywood, A. (2016) *Local housing, community living: prospects for scaling up and scaling out community-led housing.* London: The Smith Institute.
120 Heywood, A. (2016) *Local housing, community living: prospects for scaling up and scaling out community-led housing.* London: The Smith Institute.
121 NCLTN (2018) *Why CLTs*. http://www.communitylandtrusts.org.uk/what-is-a-clt/whyclts
122 Heywood, A. (2016) *Local housing, community living: prospects for scaling up and scaling out community-led housing.* London: The Smith Institute.
123 Heywood, A. (2016) *Local housing, community living: prospects for scaling up and scaling out community-led housing.* London: The Smith Institute.
124 Scottish Government, Community Empowerment Team (2018) *Community empowerment*. https://beta.gov.scot/policies/community-empowerment/
125 Heywood, A. (2016) *Local housing, community living: prospects for scaling up and scaling out community-led housing.* London: The Smith Institute.
126 NCLTN (2017) *Government relaunches multi-million Community Housing Fund*. London: NCLTN. http://www.communitylandtrusts.org.uk/article/2017/11/29/government-relaunches-multi-million-community-housing-fund
127 TCPA and Nationwide Foundation (2017) *How can councils secure the delivery of more affordable homes? New models, partnerships and innovations*. England: TCPA and Nationwide Foundation.
128 Holman, N., Fernandez-Arrigoitia, M., Scanlon, K. and Whitehead, C. (2015) *Housing in London: Addressing the Supply Crisis*. London: LSE.
129 Rogers Stirk Harbour + Partners (2018) Y:Cube. https://www.rsh-p.com/projects/ycube/ and YMCA St Paul's Group (2018) *Y:Cube*. https://ymcastpaulsgroup.org/home/our-services/accommodation/y-cube/; Local Government Association (2017) *Housing our homeless households*. England: LGA. (See Ladywell PLACE Case Study Example at pages 44-45)
130 The term meanwhile sites relates to parcels of land available for use for a limited period of time, for example pending wider redevelopment of an area.
131 Rogers StirkHarbour + Partners (2018) *Y:Cube*. https://www.rsh-p.com/projects/ycube/ ; YMCA St Paul's Group (2018) *Y:Cube*. https://ymcastpaulsgroup.org/home/our-services/accommodation/y-cube/
132 Department for Communities and Local Government (2015) Technical housing standards – nationally described space. London: DCLG standard https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf

But it is important to distinguish between such developments and smaller, unsuitable housing models – such as homes made from shipping containers, sheds, or poor quality conversions. The Y-cube is built to standards suitable for permanent housing of any tenure, achieving high energy efficiency and design quality. Innovative construction techniques can play a part in increasing housing supply. But housing expectations and standards must not be lowered for homeless people.

Making use of empty or obsolete homes and other buildings

Initiatives that bring empty homes and obsolete buildings back into use as affordable housing can help tackle homelessness. Tackling the empty homes issue will not solve the housing undersupply crisis.[133] But it can help meet local housing needs and improve housing conditions in some neighbourhoods, and create training and employment opportunities for homeless people.[134]

England

There are 205,000 long-term (more than six months) empty homes in England. This is around 0.85 per cent of all homes in the country. The highest proportions of empty homes are in North East (1.4%) and North West (1.2%) England. The Empty Homes Agency in England estimates the cost of refurbishing an empty home to be between £6,000-£25,000.

Unlike Scotland and Wales there is currently no dedicated funding programme to support the creation of affordable housing from long-term empty homes. However, the 2017 autumn budget enabled local authorities to increase the council tax premium they can charge on empty homes from 50 per cent to 100 per cent.

The English Empty Homes Agency has made the case for a dedicated funding stream and supporting national strategy to bring empty and obsolete homes back into use. They also call for more innovation at local level to achieve this,[135] and for grants to enable homes to be made available to homeless people.

Scotland

In Scotland, there are an estimated 37,000 long-term empty homes.[136] Since 2010, the Scottish Government has funded a partnership with Shelter Scotland to help local authorities work with owners of empty homes. The partnership has brought nearly 2,500 homes back into use so far.

The Empty Homes Partnership recommends the expansion of services so that all Scottish local authorities provide a holistic empty homes service. This should include advice and information, financial support, and, as a last resort, enforcment. Nineteen councils have empty homes officers who take on these roles.
The Partnership also recommends a compulsory sale order power for vacant and derelict land and buildings. This would allow local authorities to put a long-term empty property or piece of land on the open market, if it has not been used in three years and has no prospect of reuse.

Wales

In Wales, there are 23,000 empty homes, of which 1,347 (5.8%) were brought back into use in 2016/17, but with wide variation in council performance. The government has a target of bringing 5,000 homes back into use and provides £30 million to fund the Houses into Homes scheme.

External evaluation of the first three years of Houses into Homes found that it increased local government commitment to tackling the problem of empty homes, increased staffing to deal with the issue, and brought more properties back into use.[137] But it also noted that take-up of the scheme needs to be extended to benefit more local authority areas.

National government strategies to tackle housing undersupply

National governments in England Scotland, and Wales want to tackle the causes of housing undersupply.

England

The government published its White Paper, *Fixing our Broken Housing Market* in February 2017. It set out proposals to increase the supply of housing and, in the longer-term, create a more efficient housing market. This followed the creation of a new National Planning Policy Framework (NPPF) in 2012. The paper acknowledges a range of housing supply options are needed to meet the needs and aspirations of all households, and to support economic prosperity. The proposals focus on the following.

1 Reforms to the planning system[138]

- Making sure every council has a plan in place and plans are easier to produce.
- Introducing a standardised methodology to assess housing need.
- Making land ownership more transparent.
- Making more land available in the right places.
- Continuing to bring brownfield land back into use.
- More homes on public sector land – with consultation on extending public bodies' flexibility to dispose of land at less than best consideration.
- Amending the NPPF to use land more efficiently.

2 Measures aimed at increasing the pace of housing delivery

These include reforming the system of developer contributions (including the use of section 106 and the role of viability assessments). Strengthening the tools available to local authorities to speed up home building is also important. This includes encouraging use of compulsory purchase powers to support the build out of stalled sites. A new housing delivery test is also needed to ensure councils are held accountable for their role in creating enough housing. These measures are the subject of a government commissioned review led by Sir Oliver Letwin.[139]

3 Diversifying the market

This includes enabling small and medium-sized builders to play a greater role. It also involves encouraging greater use of institutional investment to deliver new homes for private rent, supporting increased delivery by housing associations and local authorities, and encouraging an expanded role for MMC.

133 Across all three nations, the volume of long term empty homes is less than one year's housing requirement.
134 Empty Homes Agency (2018) *Empty Homes in England.* London: Empty Homes Agency; Scottish Empty Homes Partnership (2016) *Guide to Financing Private Sector Empty Homes Work 2016 Update.* Edinburgh: Shelter Scotland
135 Empty Homes Agency (2018) *Empty Homes in England. London*: Empty Homes Agency
136 Scottish Empty Homes Partnership (2017) *Scottish Empty Homes Partnership Annual Report 2016-17* Edinburgh: Shelter Scotland

137 Welsh Government (2015) *Houses into Homes Evaluation – Final Report.* Wales: Welsh Government.
138 At the time of writing a revised draft NPPF has been issued for consultation. Ministry for Housing Communcities and Local Government (2018) *Draft revised National Planning Policy Framewor*k https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework
139 Gov.uk (2018) *Sir Oliver Letwin's interim report to the Chancellor of the Exchequer and the Secretary of State for Housing, Communities and Local Government*. https://www.gov.uk/government/publications/independent-reviewof-build-out-preliminary-update

Since the White Paper's publication, and in the wake of the Grenfell Tower tragedy, the government announced it will conduct a review of social housing's role. A Green Paper is due for publication in Spring 2018. *The 2017* autumn budget, confirmed that £2 billion funding will be available to deliver social rented housing for the first time since the end of the National Affordable Housing Programme in 2010/11. The government will also raise the borrowing cap from April 2019 for specified councils in areas of high affordability by £1 billion.

Scotland
Increasing the supply of affordable homes, including social rent provision, is the main priority for Scottish housing.[140] Recommendations to the government to sustain the affordable housing investment programme noted that land supply is a key risk to delivery.

- Council-owned land has a major role in affordable housing delivery – but there are concerns that the supply pipeline is short-term.
- There are issues around landowners' expectations being out of line with market prices, resulting in sites being held back.
- Local authorities relying more heavily on developer contributions to deliver affordable housing (through section 75) are concerned about the impact of market volatility on build out rates.

A government commissioned independent review of the planning system in 2016,[141] produced recommendations to strengthen local development plans. This involved replacing strategic development plans with an enhanced National Planning Framework.

To deliver more high-quality homes the review recommends diversifying housing delivery to meet the needs of a diverse population. This includes expanding opportunities for self-build, new build private renting, off-site construction and energy efficient housing. The Scottish Government's response sets out proposals to implement a programme of reform.[142] It is also investigating the case for land value taxation to address the rising price of land.

Wales
The Welsh Government, Welsh Local Government Association, Community Housing Cymru and the Federation of Master Builders signed a Housing Supply Pact in 2016. This addresses the changes needed to deliver an additional 20,000 affordable homes by 2021.[143] All those involved recognise further reforms are needed to increase the pace of housing delivery, and the pact sets out the measures to be pursued. These include:

- revisiting the Public Land Disposal Strategy with the Affordable Housing Target in mind
- reviewing section 106 practice
- increasing local authority planning resources and reinforcing the plan-led system. This includes through higher planning fees and sanctions for planning delays, and taking action to ensure councils have up to date local planning frameworks.

The Welsh Government has commissioned an independent review to examine the changes needed to increase affordable housing supply in Wales, with a report due in April 2019.[144]

140 Young, G. and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing.* Scotland: SFHA/Equality and Human Rights Commission/Shelter Scotland.
141 Beveridge, C., Biberbach, P. Hamilton, J. (2016) *Empowering planning to deliver great places – an independent review of the Scottish Planning System.* Scotland: Scottish Government.
142 Scottish Government (2017) *Places People and Planning Position Statement*. http://www.gov.scot/Resource/0052/00521888.pdf
143 Welsh Government (2018) *Housing supply,* 23rd April. http://gov.wales/topics/housing-and-regeneration/housing-supply/?lang=en

11.4 Recommendations

Increasing the supply of housing at social rent levels

Problem
The stock of social rented housing available to new households has declined and this means there are fewer social rented homes available to homeless people too.[145] As noted, programmes of investment in new homes and suspending right to buy may halt or reverse recent decreases in the availability of social rent housing in Scotland and Wales. In England, however, national policy is likely to result in less social rented stock.[146]

Across all three nations there are also concerns about social housing affordability for those on the lowest incomes, including homeless people. Continued investment in social housing is critical to tackling homelessness. But it will not, in isolation, address affordability problems for those on the very lowest incomes. This includes people who are economically inactive, those seeking work, and those in very low-paid work or with fluctuating low earnings. To tackle affordability problems, the welfare safety net must also play its part in enabling those on very low incomes to access and retain stable housing (see Chapter 10).

England
The total number of new affordable homes in England has increased on average by 48,000 homes a year since 2011.[147] This falls far short of the supply required to meet identified need in England, estimated at 90,000 new social rent homes a year over the next 15-years, as discussed earlier in this chapter. As noted, the government's announcement of an additional £2 billion to fund up to 25,000 social rent homes over the next five years does not go nearly far enough to meet this level of need.

While increasing the supply of new social rent homes is important to tackle homelessness, only around 12 per cent of lettings to new tenants are from new build homes. The rest come from relets in the existing housing stock.[148] But the availability of new social housing lettings (including social and affordable rent homes) has declined in recent years (see figure 11.2).[149] This is the result of three main factors examined below: the effect of right to buy; the policy of building new homes at affordable rents instead of social rents; and the conversion of social rent homes to affordable rent levels. This decline in the availability of new social rent lettings is strongly implicated in reduced access to social housing for homeless people.[150]

144 Welsh Government (2018) *Review of affordable housing supply in Wales announced by Minister* http://gov.wales/newsroom/housing-andregeneration/2018/180423-review-of-affordable-housing-supply-in-walesannounced-by-minister/?lang=en
145 Rowe, S., and Wagstaff, T. (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis.
146 Charted Institute of Housing (2018) "More than 150,000 homes for social rent lost in just five years, new analysis reveals". *News article.* 31st Jan. http://www.cih.org/news-article/display/vpathDCR/templatedata/cih/news-article/data/More_than_150000_homes_for_social_rent_lost_in_just_five_years_new_analysis_reveals
147 Robson, B., (2018) *Using the Social Housing Green Paper to boost the supply of low cost rented homes.* York: Joseph Rowntree Foundation.
148 Fraser, R. Perry, J., Duggan, G. (2017) *Building Bridges. A guide to better partnership working between local authorities and housing associations.* England: Vivid/Arch/CIH
149 UK Housing Review Stephens, M. Perry, J. Wilcox, S., Williams, P. and Young, G. (2018) *2018 UK Housing Review.* England: Chartered Institute of Housing
150 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., and Watts, B., (2018) *The homelessness monitor: England 2018.* London: Crisis. Rowe, S., and Wagstaff, T., (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis.

Right to buy
Only about one in six homes were provided to replace homes sold though the right to buy between 2012 and 2016.[151] A considerable proportion of right to buy homes are now let as private tenancies, resulting in higher Housing Benefit spending.[152]

Right to buy discounts and eligibility in England
People who have been public sector tenants for three years [153] have the right to buy their home (and in some circumstances their housing association home) at a discount.
If ownership of the housing transfers from a local authority to a housing association, tenants who were originally council tenants retain the right to buy under their new housing association landlord. This is referred to as the preserved right to buy. Discount rates for houses are calculated as 35 per cent of the property value plus one per cent for each year as a tenant, to a maximum of 60 per cent. For flats it is 50 per cent plus two per cent for each year, to a maximum discount of 70 per cent.

Until 2012 these discounts were subject to a cap (ie a maximum allowable discount). This ranged from £16,000 to £38,000, and was lowest in areas of highest housing pressure. In 2012 the discount cap was increased to £75,000, with a higher rate of £104,000 in London. The change in policy resulted in a rapid rise in sales – from a post-recession low of 3,865 in 2008/09 to 18,110 in 2016/17.[154]

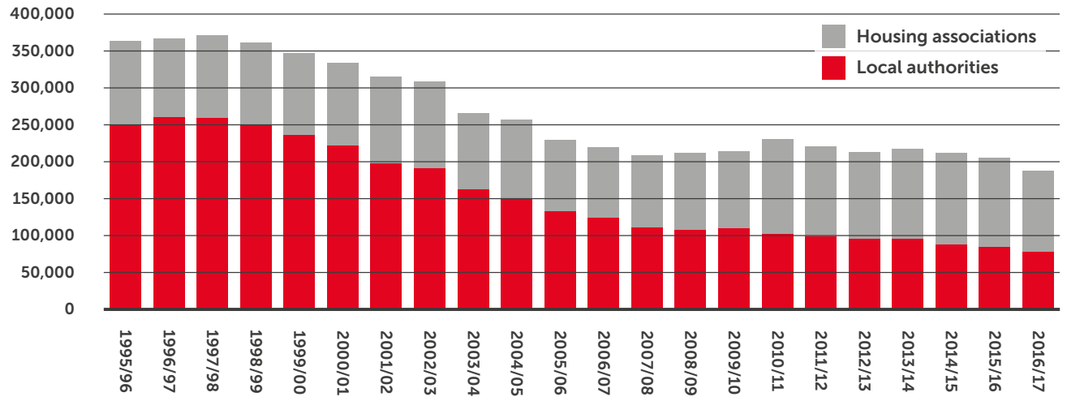
The government is proposing to extend a voluntary right to buy to most housing association tenants in England.

The move from social rents to affordable rents
There has been a dramatic reduction in the supply of new homes at social rent levels since 2010/11. This follows the decision in 2010 to switch affordable housing investment from social rent to affordable rents. Affordable rents were set at 80 per cent of market rents.
In 2016/17 only around 5,000 new homes were provided for social rent in England as shown in figure 11.3.[155]

Government policy requires housing providers bidding for development grants to convert social rent homes to affordable rent levels as they become empty. This is to reduce the amount of investment needed to fund new developments. Between 2012 and 2017, 102,000 social rent homes were converted to affordable rents.[156] CIH analysis suggests this policy, combined with the right to buy, could mean 230,000 social rent homes are lost between 2012 and 2020.[157]

151 Stephens, M., Perry, J. Wilcox, S., Williams, P. and Young, G. (2018) *2018 UK Housing Review.* England: Chartered Institute of Housing.
152 Cole, I., Green, S., McCarthy, L. and Pattison, B. (2015) *The Impact of the Existing Right to Buy and the Implications for the Proposed Extension of Right to Buy to Housing Associations.* England*:* Sheffield Hallam University/House of Commons Select Committee for Communities and Local Government.
153 The qualifying period has been the subject of repeated policy change, originally set at three years, reduced to two years in 1985, increased to five years between 2004 and 2015, and reduced again to three years in 2015. Right to buy reforms are listed in Wilson, W., and Barton, C. (2018) *Introducing a voluntary right to buy for housing association tenants in England.* London: House of Commons Library. (see Section 1.1)
154 Ministry for Housing, Communities and Local Government (2018) *Table 678: Social Housing Sales*. London: Ministry for Housing, Communities and Local Government. The figures quoted include council sales, Preserved Right to Buy (sales to tenants whose homes are owned by stock transfer housing associations) and voluntary sales by housing associations.
155 Fraser, R. Perry, J. and Duggan, G., (2017) *Building Bridges.* England: Chartered Institute of Housing/ VIVID/Association of Retained Council Housing.
156 Homes and Communities Agency (2017) *Private registered provider stock in 2016-17.* London: Homes and Communities Agency.
157 Charted Institute of Housing (2018) "More than 150,000 homes for social rent lost in just five years, new analysis reveals". *News article*. 31st Jan http://www.cih.org/news-article/display/vpathDCR/templatedata/cih/news-article/data/More_than_150000_homes_for_social_rent_lost_in_just_five_years_new_analysis_reveals

Figure 11.2: Social sector lettings to new tenants in England



Source: The 2018 UK Housing Review

Because affordable rents are set at 80 per cent of market rent levels they vary considerably around the country. In some areas, social and affordable rent levels are similar, but others have significant variation (see table 11.4). The variation is greatest in areas with high market rents.

London-based housing association, Peabody, has committed to reducing affordable rents to a more genuinely affordable level. Currently Peabody's affordable rents can be as much as £65-£80 more each week than social rents.[158]

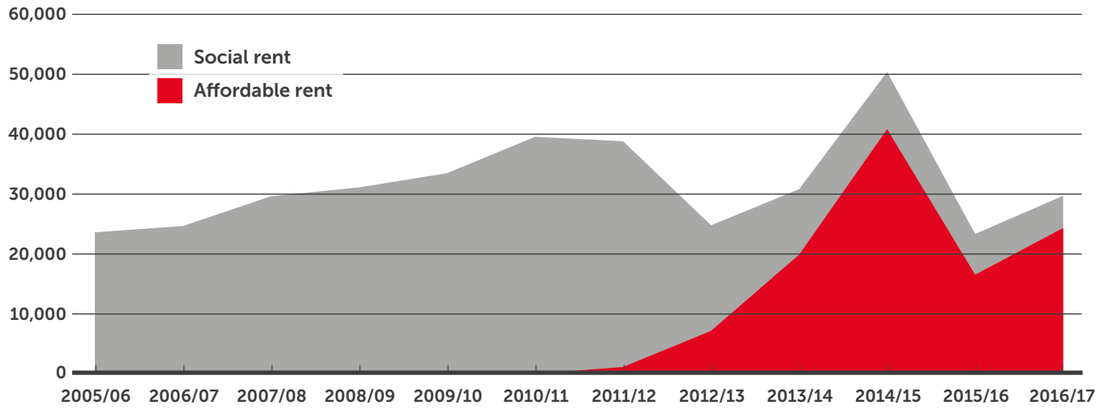
Affordable rent homes should, in theory, be available to people on low incomes supported with Housing Benefit/Universal Credit. There are, however, circumstances where benefits no longer meet the cost of rent.[159]

When affordable rents were introduced, many housing associations raised concerns about the impact for low income tenants in higher cost areas.[161] They noted that more low income working tenants would require Housing Benefit to cover the cost of their rent. Since the introduction of affordable rents, the affordability of homes let by social landlords has worsened. The proportion of social housing tenants spending more than a third of their incomes on housing has risen, as shown in figure 11.1.

Some providers have decided not to develop new homes at affordable rents, or convert homes from social to affordable rents. [162] This is because of concerns that higher affordable rent levels operate as a work disincentive and increase the risk of reliance on Housing Benefit/Universal Credit.

158 Sarsfield, B. (2018) '*Why we are freezing or cutting rents on thousands of homes*'. Inside Housing May 2018: https://www.insidehousing.co.uk/comment/comment/why-we-are-freezing-or-cutting-rents-on-thousands-of-homes-56040
159 For example, households whose Housing Benefit entitlements are reduced below the eligible rent by the total benefit cap.
160Lupton, M., and Collins, H. (2015) *Living Rents – a new development framework for affordable housing*. London: Savills.
161 Wilson, W., and Bate, A. (2015) *Affordable Rents (England).* London: House of Commons Library; Family Mosaic (2011) *Mirror, signal, manoeuvre: our drive to provide more social housing.* London: Family Mosaic
162 Bowman, H. (2014) 'Why we will no longer convert social rented homes to affordable rent', *The Guardian* 9th October. https://www.theguardian.com/housing-network/2014/oct/09/sovereign-housing-keep-social-rents-affordable: Family Mosaic example quoted in Fraser, R., Perry, J. and Duggan, G. (2017) *Building Bridges.* England: Chartered Institute of Housing/VIVID/Association of Retained Council Housing.

Figure 11.3: Number of additional homes for affordable rent and social rent, England



Source: DCLG (2017) Affordable Housing Supply: April 2016 to March 2017 England.

Some housing providers have responded by limiting access to homes let at affordable rents to groups of households considered likely to meet their rent without Housing Benefit.[163] So, they may let to in-work households only, or set inflexible requirements for paying rent in advance, or use rent guarantors.[164] All of this disadvantages homeless people who typically have very low incomes and struggle to save the money for rent in advance.

In 2010, the government introduced the concept of affordable rent to deliver more homes with less upfront capital investment by national government. Social housing providers are required to provide more homes for each pound of subsidy, and the overall pot of money for building new social housing has also been reduced.[165] But the switch from social to affordable rents will cost the taxpayer more in Housing Benefit in the long term. The National Audit Office calculated that, over 30 years, funding new homes at social rents offered better value for money for the taxpayer than higher affordable rents. This is mainly because the Housing Benefit savings outweigh the upfront investment cost.[166]

Investment to increase the supply of new, social rent homes and stopping the loss of social rent homes, would increase the supply of housing for homeless people.

Scotland

The Scottish Government is committed to deliver 50,000 affordable homes between 2016 and 2021, of which 35,000 (70%) will be for social rent. This equates to an annual target of 7,000 homes a year for social rent.

The Heriot-Watt housing requirements analysis has identified an overall requirement of 10,000 affordable homes a year over 15 years, with 5,500 of these for social rent. The Scottish Government's investment programme is therefore sufficient to meet this overall requirement and the requirement for social renting over the next five years. But successor governments will need to maintain this investment in the longer term, and ensure an appropriate balance of provision between social renting and other types of affordable housing.

As noted, the Shelter Scotland review of strategic investment plans for affordable housing suggests the government's targets for increasing the supply of social rented homes is likely to be achieved. However, it highlights some concerns about whether the allocation of funding between areas will ensure the right homes are being built in the right places.[167] The review also addressed concerns about whether enough spending is being directed to support the need for replacement of obsolete homes and refurbishment of existing stock.

Scottish planning policy currently defines affordable housing as 'homes affordable to people on modest incomes'. It specifies a range of types of affordable housing to meet the needs of different income groups, including homes at social rent levels.[168]

At a Crisis roundtable conducted for this plan, there was an indication that the Scottish Government is interested in further developing this definition to address concerns with the affordability of housing costs faced by social housing tenants.[169] The steps taken to implement an Energy Efficiency Standard for social housing is a first step to considering how to reduce rental costs. This is particularly important in rural areas where the overall cost of living, including housing costs, can be ten to 40 per cent more than in urban areas.[170]

Wales

In Wales, £1.5 billion has been allocated to deliver 20,000 new affordable homes between 2016 and 2021. Sixty five per cent of these homes will be for social rent, equivalent to 2,600 homes a year.

This compared with an affordable

163 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2017) *The homelessness monitor: England 2017.* London: Crisis.
164 Rowe, S. and Wagstaff, T. (2017) *Moving on – Improving access to housing for single homeless people.* London: Crisis.
165 Jefferys, P., Lloyd, T., Argyle, A., Sarling, J.,Crosby, J. and Bibby, J. (2014) *Building the homes we need.* London: KPMG/Shelter http://england.shelter.org.uk/__data/assets/pdf_file/0010/802567/Building_the_homes_we_need_digital_copy.pdf Stephens, M. Perry, J., Wilcox, S. Williams, P. and Young, G. (2018) *2018 UK Housing Review.* Coventry: Chartered Institute of Housing.
166 National Audit Office (2012) *Financial Viability of the social housing sector: introducing the Affordable Homes Programme* London: National Audit Office. (paragraph 2.7.)

Table 11.4 Example of variation in average social and affordable weekly rents for a 1-bed home (2015)

Rent type	Area				
	Rotherham	Birmingham	Tower Hamlets	Waltham Forest	Reading
Affordable	69	86	148	152	120
Social	66	76	107	95	98
Lower quartile private rented sector	80	97	275	179	150

Source: Lupton, M., and Collins, H. (2015) *Living Rents-a new developments framework for afforable housing.*

167 Young, G., and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing.* Edinburgh : Shelter Scotland.
168 Scottish Government (2014) *Scottish Planning Policy.* Scotland: Scottish Government. (paragraph 126)
169 Full details are set out in a Crisis and Chartered Institute of Housing briefing (forthcoming). See also Clarke, N. (2013) *Perspectives on Rents and Affordability in Scotland. A briefing paper from Chartered Institute of Housing Scotland* Scotland: Chartered Institute of Housing Scotland.
170 Clarke, N. (2013) *Perspectives on Rents and Affordability in Scotland. A briefing paper from Chartered Institute of Housing Scotland.* Dundee: Chartered Institute of Housing Scotland.

housebuilding requirement identified by the Heriot-Watt housing requirements analysis of 6,500 homes a year for 15 years, of which 4,000 homes should be for social rent. The Welsh Government will therefore need to continue to grow its investment in social rented housing to meet identified need.

The government has introduced legislation to abolish the right to buy to reverse the decline in the number of homes available for social rent.

While the government's funding commitment and the end of right to buy are important in increasing the availability of affordable housing, further reforms are also needed. As noted above, the Welsh Government, Welsh Local Government Association, Community Housing Cymru and the Federation of Master Builders agreed a Housing Supply Pact in 2016. This aims to implement a programme of reform to increase the supply of affordable homes.[171] The Welsh Government has also commissioned an independent review to examine the changes needed to increase affordable housing supply in Wales, with a report due in April 2019.[172]

Solutions

England

The Westminster Government should provide national leadership to increase the supply of additional social rented housing. They should also halt the reduction in the supply of homes caused by the conversion of social to affordable rents and the right to buy. The following actions from the government are needed to achieve these objectives.

- Set a target for delivering 90,000 homes a year at social rent levels, and grow investment to meet this target over a 15-year period.
- Increase the share of national government housing investment to meet the target for social rented housing through new build, acquisition and the conversion of empty/obsolete buildings.
- Ensure that all developing housing associations provide a proportion of new homes at social rent levels or an equivalent rent benchmark affordable to homeless and other low income households.
- Prevent further erosion of the social rented housing stock by ending the policy of requiring housing associations to convert social rent homes to affordable rent.
- Suspend the right to buy while implementing a programme of investment and wider changes that increase the supply of lettings available to homeless people.
- Extend flexibility on local authority housing revenue account borrowing caps to allow councils to build more homes for social rent. Allowing local authorities to present business plans with increases in debt caps should be linked to targets for delivering homes at social rent levels. The government's intention to raise the borrowing cap from April 2019 for specified councils in areas of high affordability by £1 billion needs to go further.
- Create a definition of affordable housing for planning and investment purposes that delivers new homes homeless people and others on low incomes can afford. This must relate housing costs to households' ability to pay, expressly requiring provision to meet the identified needs of households on the National Minimum Wage. The definition must clearly distinguish between models affordable for households on the lowest incomes, and intermediate housing models at a cost affordable to median earners and above but below market levels.

Scotland

The Scottish Government should maintain investment to deliver the equivalent of 5,500 homes a year at social rent levels over a 15-year period, and ensure funding is targeted effectively to meet needs identified at local housing market level.

Wales

The Welsh Government should increase its annual target for the delivery of new social rent homes to 4,000 a year, and continue to grow its investment in social rented housing to deliver the equivalent of 4,000 homes a year over a 15-year period.

Great Britain

National governments in all three nations should ensure that the rent setting framework for social rented housing in each nation delivers rents that remain affordable to those earning the National Minimum Wage and can be accessed by households in receipt of Housing Benefit.

Impact

The impact on homelessness of measures to increase the supply of social renting will depend on the extent to which available social rented homes are targeted at homeless households. Measures to increase homeless peoples' access to social housing are the focus of the next solution: increase access to social renting for homeless people. There is a strong association between social rent supply and access for homeless people; the two must be addressed in parallel. Failure to tackle the supply shortage leaves us making the case for an increased proportion of a diminishing pool of homes, potentially to the detriment of others in housing need.

Responsibility for change

The Westminster Government must provide strategic leadership to increase the supply of social rented housing in England.

The Scottish and Welsh Governments should continue to shape programmes of investment and wider interventions to increase the output of social rented homes.

Increase access to and sustainment of social renting for homeless people

Problem

Traditionally, social housing has been important in resolving homelessness. But it is becoming more difficult for homeless people to get access to social housing.

The rate and number of social housing lettings to homeless people has declined over the past decade across all three nations, though not in the last year. The overall decline is less marked in Scotland where social landlords allocated more than 40 per cent of lettings to homeless households in 2016/17 (see figure 11.4). This is compared with fewer than a fifth of lettings allocated in England and Wales (Welsh data is for 2015/16).

In all three nations, housing associations provide a lower proportion of lettings to homeless households than local authorities. The gap between council and housing association performance in housing homeless people is greatest in Scotland (51% councils/33% housing associations) and lowest

171 Welsh Government (2018) *Housing Supply*. http://gov.wales/topics/housing-and-regeneration/housingsupply/?lang=en

172 Welsh Government (2018) *Review of affordable housing supply in Wales announced by Minister*. http://gov.wales/newsroom/housing-and-regeneration/2018/180423-review-of-affordable-housing-supply-inwales-announced-by-minister/?lang=en

in England (24% councils/21% housing associations).[173] In Wales the proportions are 26 per cent councils and 14 per cent housing associations.[174]

As illustrated earlier in this chapter, tackling the shortage of social rented housing will be critical to tackle the backlog of housing need, and the needs of homeless people. But there is evidence that other barriers are also restricting homeless people's access to social housing.

Pre-tenancy assessment practice and the use of affordability tests

Many local authorities are concerned that homeless people are not accepted for rehousing by housing associations on affordability grounds.[175] These concerns highlight difficulties with the operation of nominations agreements which, as noted in Chapter 13 'Homelessness legsislation', have been a source of complaint from both local authorities and housing associations.[176]

Evidence from all three nations shows affordability tests and/or inflexible application by some housing providers of requirements for the first month's rent in advance, can restrict access to social housing.[177] There is also evidence that some housing providers adopt restrictive approaches to homeless applicants with historic rent arrears.[178] Yet, it is sometimes the case that homeless people need re-housing exactly because of difficulties paying rent in the past. This could be because of unaffordable rents, benefit restrictions, and other circumstances outside their control.

Some social housing providers adopt practices that are sensitive to individual circumstances, and enable homeless people to gain access to social rented tenancies.[179] This might include using pre-tenancy assessments as a way to identify measures needed to support households on very low incomes to take up a tenancy. It might also include allowing payment of a reduced sum of rent in advance or waiving the requirement while a benefit claim is resolved. The evidence presented in this chapter suggests such flexibility is not universal.

The Welsh Government Public Accounts Committee is among those raising concerns that financial assessments by social landlords may sometimes unintentionally exclude people from social housing because they are 'too poor'.[180] Subsequent research by Shelter Cymru found examples of applicants being unable to

173 Stephens, M. Perry, J., Wilcox, S., Williams, P., and Young, G. (2018) *2018 UK Housing Review.* England: CIH – data for 2016/17

174 Stephens, M. Perry, J., Wilcox, S., Williams, P., and Young, G. (2018) *2018 UK Housing Review.* England: CIH – data for 2015/16

175 Fraser, R., Perry, J. and Duggan, G. (2017) *Building Bridges*. England: CIH/VIVID/Association of Retained Council Housing; Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2017) *The homelessness monitor: England 2017.* London: Crisis.

176 Greaves, F. (2017) *Tackling Homelessness Together: The importance of local authorities and housing associations working in partnership.* England: The University of Sheffield, CIH.

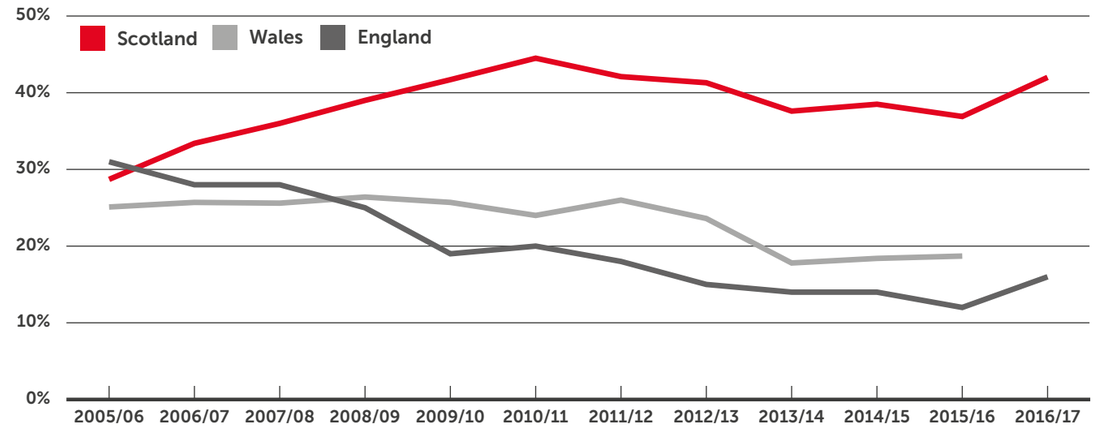
177 Campbell, J. Golten, A., Jackson, R., and Evans, R. (2016) *Accessing and sustaining social tenancies: exploring barriers to homelessness prevention.* Swansea: Shelter Cymru; SFHA/Shelter Scotland (2017) *First Month's Rent Flexibilities: Good Practice Guide*. Scotland: SFHA/Shelter; Rowe, S., and Wagstaff, T. (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis.

178 Campbell, J. Golten, A., Jackson, R., and Evans, R. (2016) *Accessing and sustaining social tenancies: exploring barriers to homelessness prevention.* Swansea: Shelter Cymru; Rowe, S., and Wagstaff, T. (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis.

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

180 National Assembly for Wales Public Accounts Committee (2015) *Responding to Welfare Reform in Wales*. Wales: National Assembly for Wales.

Figure 11.4 Proportion of social housing lettings to homeless households



Source: 2018 UK Housing Review

take up tenancies due to requirements for payment of the first month's rent.[181] In Scotland, registered providers are obliged to comply with a local authority's request to provide accommodation for homeless households unless there is a 'good reason' not to. In practice the extent to which lettings are made available for homeless nominees varies significantly by local authority area.

Access to tenancy-related support for homeless people in general needs housing

In England, reduced spending on tenancy sustainment support can be a barrier to social housing. Local authority housing teams report social landlords' increased reluctance to accept tenants considered to have support needs.[182] Supporting People services have traditionally funded a range of homelessness prevention and tenancy support services. These help people access and keep their tenancies, and reassure social landlords in the process. Funding for the Supporting People programme in England has decreased by 67 per cent in real terms since 2010.[183]

The most recent *Homelessness Monitor: Wales 2017* noted that Supporting People funds have been relatively protected in Wales; unlike in England they remain ring-fenced for the time being.[184] The Welsh Government has, however, announced plans to merge Supporting People funding with other non-housing grant funding from 2019/20. This raises significant concerns about the erosion of much-needed support for homeless people.[185]

As noted in Chapter 13, in Scotland local authorities have a statutory duty

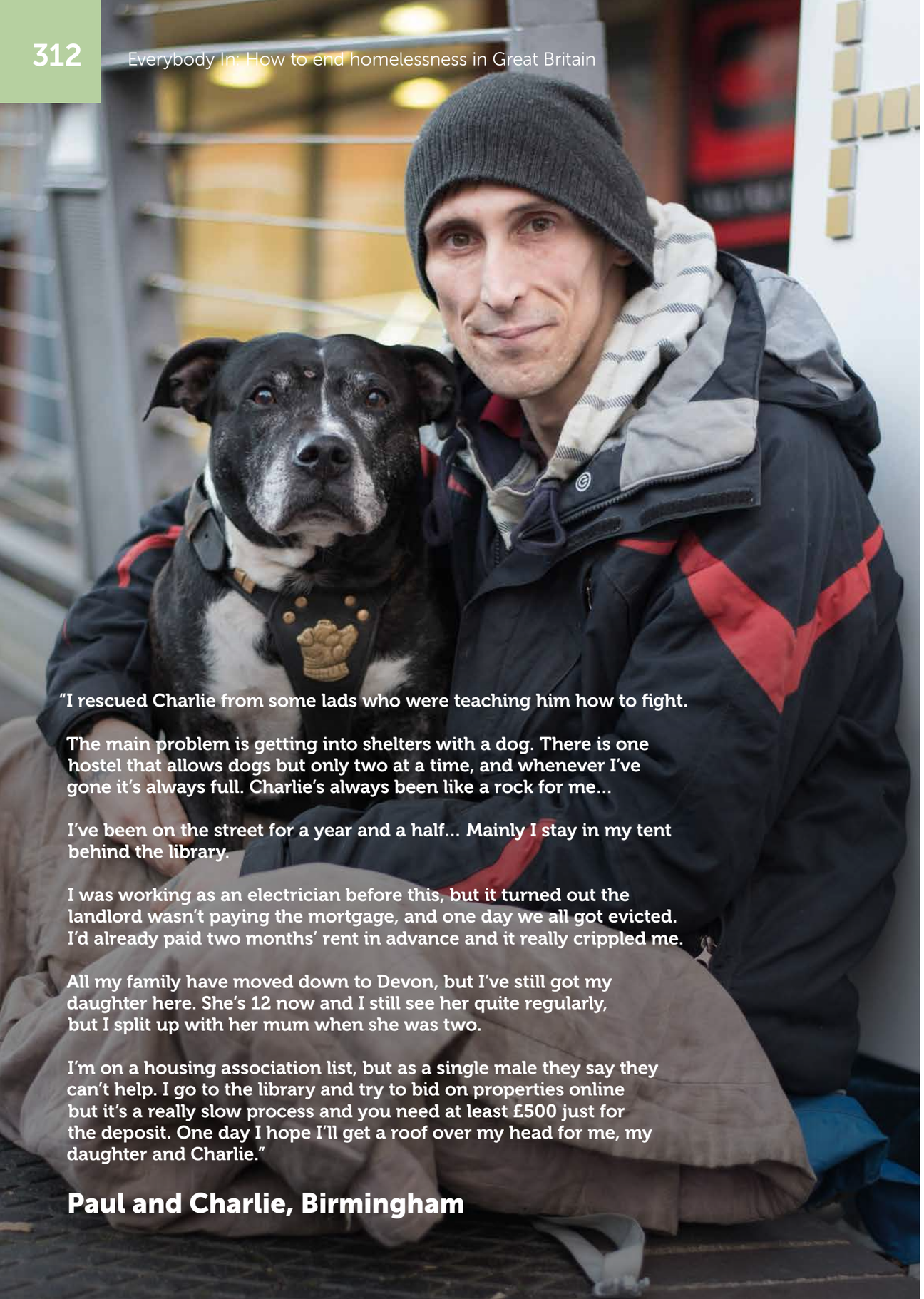
181 Campbell, J. Golten, A., Jackson, R., and Evans, R. (2016) *Accessing and sustaining social tenancies: exploring barriers to homelessness prevention.* Swansea: Shelter Cymru.

182 Fitzpatrick, S. Pawson, H., Bramley, G., Wilcox, S., and Watts, B. (2017) *The homelessness monitor: England 2017.* London: Crisis.

183 Fitzpatrick, S. Pawson, H., Bramley, G., Wilcox, S., and Watts, B. (2017) *The homelessness monitor: England 2017.* London: Crisis.

184 Fitzpatrick, S., Pawson, H. Bramley, G., Wilcox, S., and Watts, B. (2017) *The homelessness monitor: Wales 2015*. London: Crisis.

185 Inside Housing (2017) *Welsh Government to merge Supporting People with other grant schemes*. 24th October. https://www.insidehousing.co.uk/news/news/welsh-government-to-merge-supporting-peoplewith-other-grant-schemes-52921



"I rescued Charlie from some lads who were teaching him how to fight.

The main problem is getting into shelters with a dog. There is one hostel that allows dogs but only two at a time, and whenever I've gone it's always full. Charlie's always been like a rock for me...

I've been on the street for a year and a half... Mainly I stay in my tent behind the library.

I was working as an electrician before this, but it turned out the landlord wasn't paying the mortgage, and one day we all got evicted. I'd already paid two months' rent in advance and it really crippled me.

All my family have moved down to Devon, but I've still got my daughter here. She's 12 now and I still see her quite regularly, but I split up with her mum when she was two.

I'm on a housing association list, but as a single male they say they can't help. I go to the library and try to bid on properties online but it's a really slow process and you need at least £500 just for the deposit. One day I hope I'll get a roof over my head for me, my daughter and Charlie."

Paul and Charlie, Birmingham

to assess the housing support needs of unintentionally homeless applicants. They must also ensure support is provided to those assessed as being in need.

Data on homeless households' support needs in England and Wales are hard to source.[186] In Scotland data on the support needs of homeless applicants are gathered as part of the homelessness application process. Although there are concerns about the fluctuations in the level of need recorded by Scottish local authorities.[187] In 2016/17, 44 per cent of those threatened with homelessness in Scotland were identified as having support needs.[188]

Crisis has analysed the scale of support needs among working age single homeless households in England. This analysis estimates that around a third have no support needs or require access only to practical support in the early stages of their tenancy.[189] We also estimate that a third have moderate support needs, and a third have complex or multiple support needs.

Research published in 2008 by the Centre for Housing Policy at the University of York, draws on surveys of homeless households in England. It suggests that the extent of support needs among homeless families with children is lower than the level identified by Crisis for single adult households.[190]

Research for a consortium of housing associations has shown that effective in-tenancy support has good results. It can help tenants in mainstream housing manage their low incomes and financial difficulties, sustain their tenancies, and prevent homelessness from rent arrears.[191] Cuts to Supporting People services in mainstream housing could limit homeless people's prospects of both gaining and retaining access to general needs social housing.

In Chapter 13 we make the case for an extension of duties to assess support needs and provide support for homeless people in England and Wales.

Housing register eligibility in England

Changes to housing register eligibility in England, permitted by *The Localism Act (2011)*, have also affected homeless people entering social housing. This is because the Act allows local authorities to exclude groups of people designated as 'non-qualifying' from housing registers.

The stated aim of the new allocations powers in *The Localism Act (2011)* was to enable local authorities to better manage their waiting lists. The powers were also intended to target the 'scarce resource' of social homes at people who 'genuinely need and deserve them'.[192]

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186 Unlike Scotland where the Scottish Government collects data on housing related support needs as part of the homelessness statistical report (HL1).

187 Scottish Government (2018) *Homelessness in Scotland: update to 30 September 2017.* https://beta.gov.scot/publications/homelessness-scotland-update-30-september-2017/

188 Scottish Government (2018) *Homelessness in Scotland: update to 30 September 2017.* https://beta.gov.scot/publications/homelessness-scotland-update-30-september-2017/

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

190 Pleace, N., Fitzpatrick, S., Johnsen, S., Quilgars, D. and Sanderson, D. (2008) *Statutory Homelessness in England: The experience of families and 16-17 year olds*. London: Department for Communities and Local Government.

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

192 Department for Communities and Local Government (2013) *Providing social housing for local people. Statutory guidance on social housing allocationsfor local authorities in England*. London: Department for Communities and Local Government.

Between 2012 and 2017, council housing registers 'lost' 700,000 people. This may include some people without a need for social housing, but there is evidence the reform has led to homeless people and others in housing need being excluded.[193]

This happens when local authorities apply categories of exclusion. These could be based on factors such as historic rent arrears, a history of anti-social behaviour or a previous offending history. It can also include restrictions on the grounds that an applicant has not lived for long enough in the area, or does not meet other local connection rules. Blanket exclusions applied in such an arbitrary way are out of step with the spirit and letter of *The Homelessness Reduction Act (2017)*. This Act seeks every opportunity to prevent homelessness, regardless of people's backgrounds.

Also the government's Homelessness Code of Guidance states housing authorities should not use housing register qualification criteria to exclude homeless households entitled to reasonable preference in housing allocation.[194]

While this includes households judged non-priority under the homelessness legislation, Crisis clients are sometimes told they are ineligible to register for housing.[195] This is despite the government's Homelessness Code of Guidance and local authority allocations policies stating that exclusions may be waived in specified or exceptional circumstances and individual circumstances taken in to account. Local authorities do not always have systems in place to ensure individual circumstances are in fact considered.

And where applications are turned down, homeless people may not be aware that they have grounds to seek review of a decision to exclude them from the housing register. They may also not have the capacity to manage an appeal. Participants in our national consultation to inform this plan highlighted problems with the use of housing register exclusions to restrict access to social housing, and called for an end to this practice.[196]

The Ministry for Housing, Communities and Local Government (MHCLG) collects statistics on local authorities' use of housing register exclusions on the grounds of local connection and rent arrears. Nine out of ten local authorities were found to use local connection exclusions, while just over half exclude people in rent arrears.[197] Some councils also exclude households from registers if there are previous criminal convictions or previous unacceptable behaviour.[198]

Our research found that such restrictions particularly affect homeless people. This can be because the circumstances that led to their homelessness may also be associated with rent arrears from a previous tenancy. It could also be because domestic abuse has contributed to tenancy loss and is identified by the social landlord as anti-social behaviour.[199]

In Wales, a local authority may judge an applicant ineligible for an allocation. This could be if the applicant, or a member of their household, is considered guilty of unacceptable behaviour serious enough that he or she is considered an unsuitable tenant.[200] In Scotland, where an applicant has had their application suspended temporarily by a local authority, a statutory homelessness decision overrides this. This means the applicant has to be considered for housing.

Solutions

In England, the Westminster Government should revise national allocations guidance to ensure homeless people are not excluded from registering for social housing.

The Westminster, Scottish and Welsh Governments should create a regulatory requirement for all registered providers of mainstream, permanent social housing to set an annual guideline target for the minimum proportion of social lettings to homeless nominees.

The target should be publicly reported on. This requirement would supplement the existing regulatory standards social housing providers are expected to meet to help local authorities fulfil their homelessness duties.[201] These requirements are set out in the Tenancy Standard.[202]

In England, Scotland and Wales, social housing regulators and/or in England, Ministry for Housing, Communities and Local Government specialist homelessness advisers should ensure the following.

- All social housing providers should fulfil their responsibilities to cooperate with local authorities in meeting their homelessness duties. They should adopt best practice in supporting homeless people into social housing and helping them succeed in their tenancies. This should include best practice in the use of pre-tenancy assessments and affordability/financial capability assessments, and a person-centred approach to considering housing applications. It should also include best practice to help prevent social housing tenants becoming homeless. A set of model commitments for social housing providers is set out at Appendix 2. We urge social housing providers to commit to this set of commitments.

- All local authorities and social housing providers should monitor and report publicly on their performance in providing settled homes for homeless people. This should be part of wider cooperation on the formulation and implementation of local authority homelessness strategies.

193 Rowe, S. and Wagstaff, T. (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis.
194 Ministry for Housing, Communities and Local Government (2018) *Homelessness Code of Guidance for Local Authorities.* London: Ministry for Housing, Communities and Local Government.
195 Rowe, S., and Wagstaff, T., (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis.
196 Hughes, N. (2018) *Have your say policy consultation: summary report.* London: Crisis.
197 Analysis of Department for Communities and Local Government (2017) *Local authority housing statistics data returns for 2015 to 2016*. https://www.gov.uk/government/collections/local-authority-housing-data#2015-to-2016
198 Rowe, S. and Wagstaff, T. (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis.
199 Rowe, S., and Wagstaff, T., (2017) *Moving on - Improving access to housing for single homeless people.* London: Crisis; APPG for Ending Homelessness (2017) Minutes, 25th January. https://www.crisis.org.uk/ending-homelessness/appg-for-ending-homelessness/
200 Section160A (7) *Housing Act (1996)*
201 Homes and Communities Agency (2012) *Tenancy Standard*. https://www.gov.uk/government/publications/regulatory-standards
202 This recommendation is included against a context in which social housing providers have recently been reclassified as private bodies in England (with similar moves towards reclassification in Scotland and Wales). It is proposed on the assumption that this measure enhances rather than significantly alters the existing framework of regulatory standards. The reclassification follows changes to the framework governing national and local government influence on registered providers to ensure they retain a private classification. The change for England is confirmed here: Office of National Statistics (2017) *Statement on classification of English housing associations, November 2017.* https://www.ons.gov.uk/news/statementsandletters/statementonclassificationofenglishhousingassociationsnovember2017
The change in turn allows borrowing by housing associations to be treated as private and not part of government debt – see chapter 4 of *The 2017 UK Housing Review,* for a full explanation.

The Welsh and Westminster Governments should amend the Regulator of Social Housing (England) and Welsh Government's regulatory objectives to include safeguarding and promoting the interests of homeless people as well as current and future tenants (mirroring the objectives of the Scottish Housing Regulator).

The social housing regulatory framework should ensure all social landlords assist households to meet their homelessness duties and deliver good outcomes for homeless people.

Impact
These changes are designed to improve consistency of practice across the sector and could be implemented in the short term. Timescales for changing regulatory objectives and guidance would require consultation and a short-medium term timeframe for implementation.

Responsibility for change
National governments and social housing regulators should provide strategic leadership to ensure social housing providers meet homeless people's needs.

Housing associations and local authorities and their membership bodies, and the relevant professional associations, must implement and share best practice.

Ensure the private rented sector is fit for purpose as a housing solution for homeless people

Problem
The private rented sector is increasingly important in helping end homelessness. It is often the only viable housing option for single homeless people. Despite this, the ending of an Assured Shorthold Tenancy has become the leading cause of homelessness in England and Wales.

The sector is also characterised by a lack of security, poor conditions and high rents.

In Scotland, although poor conditions and high rents are a concern, the government has recently taken steps to improve security of tenure for private rented sector tenants. As already noted, local authorities often struggle to tackle poor conditions and standards in the sector. This is because of a lack of resources and basic data on private landlords and stock in their area. While the size of the private rented sector has grown, environmental health budgets have been in decline.[203]

In England and Wales the private rented sector is characterised by short-term fixed contracts of only six or 12 months. These often fail to provide homeless people with the security they need to rebuild their lives. Beyond this initial fixed-term period, tenants can be evicted using a section 21 'no fault' possession notice. They can be required to leave at relatively short notice (two months).

The loss of a private rented sector tenancy has become the leading cause of homelessness in England. The proportion of statutory homelessness acceptances by local authorities resulting from the termination of a private tenancy has increased significantly from 11 per cent in 2009/10 to 31 per cent in 2015/16[204]. Loss of rented housing accounted for the largest share (34%) of households considered by the local authority as threatened with homelessness in 2016/17.[205]

Local authority tenancy relations services can help people sustain tenancies and mediate when disputes arise over poor management or conditions. However, the number of tenancy relations officers employed by local authorities has decreased in recent years.[206]

The Scottish Government has implemented reforms designed to improve security and restrict the frequency of rent increases. *The Private Housing (Tenancies) (Scotland) Act (2016)* introduces a new private residential tenancy that must be used for every new private tenancy. The new tenancy type is open ended and the landlord will only be able to give notice under one of the 18 specified grounds for eviction.

If a tenant has lived in the property for more than six months they will be entitled to 84 days' notice unless the landlord has served notice because the tenant is at fault. This gives private renting tenants in Scotland greater security of tenure than those in England and Wales.

The Welsh Government has legislated to simplify rental contracts, but the reforms do not significantly improve security of tenure for private renters in Wales. *The Renting Homes (Wales) Act (2016)* will replace the current secure and assured tenancy types in Wales with two new contracts.

These are a secure contract based on the current secure tenancy issued by local authorities and a standard contract. The latter is modelled on the current Assured Shorthold Tenancy used mainly in the private rented sector.

The reform aims to make it simpler and easier to rent a home. The standard contract will be initially granted for a fixed term and when the fixed term expires this will automatically convert to a periodic contract. The landlord will still be able to end the contract without cause after the initial six months.

In England, the Westminster Government is promoting tenancies of three or more years on new build rental homes. While longer-term tenancies are already more common in the build to rent sector,[207] six or 12-month fixed term agreements remain the norm in the second hand rental market.

This is partly due to a lack of understanding from both tenants and landlords about how longer-term tenancies would work. Both parties may be concerned that a longer-term tenancy would limit their flexibility, for example to move or to sell the property if they needed to. Landlords also have concerns about their ability to evict tenants who build up significant rent arrears, cause extensive damage to the property or behave antisocially.[208]

Unaffordable rent increases are also a concern for tenants as there is currently no limit to the amount that landlords can increase the rent by. This adds to the instability of private renting for tenants. A large rent increase can make the property unaffordable and force them to move, putting them at increased risk of homelessness.

203 Unison (2012) *Environmental Health: how cuts are putting individuals and communities at risk and damaging local businesses and economies.* London: Unison.
204 Fitzpatrick, S., Pawson, H., Bramley, G. Wilcox, S., and Watts, B., (2017) *The homelessness monitor: England 2017.* London: Crisis.
205 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2017) *The homelessness monitor: Wales 2017.* London: Crisis.
206 Gousy, H. (2014) *Safe and Decent Homes.* London: Shelter.
207 Alakeson, V. (2013) *The challenges of build to rent for UK Housing Providers.* London: Resolution Foundation.
208 De Santos, R. (2012) *A better deal – towards more stable private renting.* London: Shelter.

Elements of welfare reform, particularly the decoupling of Local Housing Allowance rates from market rents, have made the sector increasingly unaffordable. It has also left private renters vulnerable to rent arrears and subsequently eviction.

Unaffordable rent levels, up-front costs of deposits and rent in advance make it difficult for people on low incomes to find another property after receiving notice from their landlord. This puts them at greater risk of homelessness. Even where landlords let properties at rents within Local Housing Allowance rates, they are increasingly reluctant to let to people receiving Housing Benefit or to homeless people.[209]

Participants during our national consultation strongly argued for reform of the private rented sector to address the issues highlighted here. This would help to ensure the sector is a secure and affordable housing option for homeless people or those at risk of homelessness.[210] Participants with experience of homelessness emphasised the importance of improving security of tenure, and raised concerns about the affordability of deposits and rents.[211]

"There is a lack of suitable and genuinely affordable housing – they are often poor quality and overcrowded with utterly high rents, which benefits don't cover. The private rented sector is unstable, and [it is] far too easy to get evicted." (Consultation participant, Croydon)[212]

Interventions such as rent deposit guarantees, help to rent schemes and social lettings agencies help homeless people and other low income households access private rented tenancies. They do this in the following ways.

- Rent deposit guarantees provide a written commitment from a council or help to rent project to mitigate the risks landlords face when letting a home to a low-income household. The guarantee covers certain costs that the landlord may incur at the end of a tenancy including damages and in some cases rent arrears. Such guarantees or bonds are commonly used by local authorities and not-for-profit providers to enable homeless people to access private tenancies.[213]
- Help to rent projects support homeless people, vulnerable tenants and landlords to make the private sector a viable option. Support includes: pre-tenancy and on-going support for homeless people when they become tenants; written guarantees for landlords in place of cash deposits; and help with benefits.

Projects build good relationships between landlords and their tenants, encouraging longer tenancies, and helping to prevent homelessness. Between 2010-2014, with funding from the then Department for Communities and Local Government (DCLG), Crisis ran the Private Rented Sector Access Programme. It created more than 8,000 tenancies; 90 per cent lasted over six months. Evaluation on the programme showed that in three months, 92 projects saved more than £13 million in non-housing costs to the public purse.[214] These projects also help tenants to gain employment, along with the support they receive to help make Universal Credit more sustainable.

Crisis recently commissioned WPI Economics to identify the cost benefits to the government of both funding accredited help to rent projects and establishing and underwriting a national rent deposit guarantee. They identified that £31 million would be required per annum over a three-year period. This would be made up of:

- £24.1 million a year to fund help to rent projects
- £6.7 million to establish a national rent deposit guarantee scheme.

The Westminster Government committed to providing £20 million to fund private rented sector access schemes in the 2017 autumn budget.

Social letting agencies are another way of providing a supply of decent private rented housing that can be targeted at homeless people. There are a range of models,[215] but the key principle is that schemes operate as an intermediary between private landlords and tenants. They sometimes involve the agency leasing private properties and providing guaranteed rental income. The agency may provide management services directly or subcontract to a specialist/social housing provider. The agency ensures homes are of a decent standard, and the landlord receives a more secure income stream.

In some cases social lettings agencies may have a role in delivering or signposting to services such as employment support. Some social lettings agencies have become involved in property acquisition. This provides an asset base to further grow services, and there are examples of such provision targeted specifically at homeless people.[216]

Homes for Good Community Investment Company
Homes for Good is an ethical property management company and lettings agent based in Glasgow. It lets homes to people on low incomes, and others disadvantaged in the housing market, including people receiving Housing Benefit. The agency manages properties for private landlords, and provides tenancy sustainment support to tenants, including budgeting advice, financial planning and employability assistance. A sister company, Homes for Good Investments buys and refurbishes derelict properties, which are then let through Homes for Good.[217]

Fifty nine per cent of landlords with experience of letting to homeless people said they would only consider letting to homeless households if backed by such interventions.[218]

If the private rented sector is to continue to provide a solution to homelessness, the problems described above must be addressed. National governments must build on recent reforms, and take the further steps recommended below to ensure homeless people can access stable, affordable and decent private rented homes. The changes recommended here would help to ensure the private rented sector provides a good solution for anyone who is homeless or at risk of homelessness.

209 Reeve, K., Cole, I., Batty, E., Foden, M., Green, S. and Pattison, B. (2016) *Home no less will do. Homeless People's access to the Private Rented Sector.* London: Crisis.
210 Hughes, N. (2018) *Have your say policy consultation: summary report*. London: Crisis.
211 Crisis, Groundswell and uscreates (2018) *The lived experience of homelessness.* London: Crisis.
212 Crisis, Groundswell and uscreates (2018) *The lived experience of homelessness.* London: Crisis.
213 Gousy, H. (2016) *Home: No less will do.* London: Crisis.
214 Gousy, H. (2016) *Home: No less will do.* London: Crisis.
215 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2017) *The homelessness monitor: England 2017.* London: Crisis.
216 Power, A., Berlotti, A., Lane, L., and Provan, B. (2018) *Private renting: Can social landlords help? CASE Report 113.* London: LSE Housing and Communities.
217 Power, A. Berlotti, A., Lane, L., and Provan, B. (2018) *Private renting: Can social landlords help? CASE Report 113.* London: LSE Housing and Communities.
218 Reeve, K., Cole, I., Batty, E., Foden, M., Green, S. and Pattison, B. (2016) *Home no less will do. Homeless People's access to the Private Rented Sector.* London: Crisis.

Solutions

Require every landlord in England to ensure any home they rent is fit for human habitation at the start of, and throughout, the tenancy.

This would cover issues such as damp, mould and infestation, not covered by existing repairing obligations. Tenants would be able to take legal action against their landlord if they fail to comply with their obligations.

In England, the homes (fitness for human habitation and liability for housing standards) bill 2017-19, a private members bill currently before parliament, would achieve this if it becomes law.

The Renting Homes (Wales) Act (2016) introduces a similar requirement for rented homes to be fit for human habitation. This is expected to come into force in 2018.

In Scotland, properties are already required to be reasonably fit for occupation. If the landlord does not address an issue the tenant can take it to the First-tier Tribunal for Scotland (Housing and Property Chamber), who can make the landlord carry out the necessary work.

Full-scale reform of the legal aid system is outside the scope of this report. However, access to legal advice and support will be crucial to allow tenants to take action to remedy poor conditions if their rented home does not meet legislative standards.

Currently tenants can be deterred from taking legal action in disrepair cases because it can prove costly and little assistance is available for tenants who cannot afford to pay the legal fees.

Impact

We would expect to see standards in the private rented sector improving through the proposed legislation. It should make landlords more aware of their responsibilities and more inclined to act upon them due to the risk of having legal action taken against them. However, the impact may be limited if legal aid is not available for these cases.

As the bill is currently before parliament legislative change could be achieved quickly. It is likely to take longer for the full impact to be realised and that will be dependent on tenants' ability to take legal action.

Responsibility for change

The Westminster Government.

Place a statutory duty on local authorities in England, Scotland and Wales to provide a tenancy relations service.

An effective tenancy relations service would help to reduce demand on the legal system, by ensuring most cases are resolved outside the courts. A tenancy relations service would also play a key role in homelessness prevention. It would help to resolve issues that may otherwise escalate to the point where the tenant chooses to leave or the landlord serves notice.

Impact

This would allow renters to seek advice and take action both to remedy poor conditions and obtain compensation for any damages suffered. The impact could be measured by looking at the number of tenants bringing disrepair cases, and by measuring general improvements in conditions in the private rented sector, for example through the English Housing Survey or the Scottish Housing Quality Standard.

A fall in the overall number of statutory homelessness applications would be expected and specifically in the number of households becoming homeless as a result of a private sector tenancy ending. We would also expect more substantial changes, more quickly when tenants have access to legal aid to support their claims.

Responsibility for change

The Westminster, Welsh and Scottish Governments.

Introduce a national register of landlords for England, with all private landlords and letting agencies required to join.

To register, landlords must demonstrate that their properties meet basic safety requirements. They would also complete basic training on their rights and responsibilities as a landlord and pass a 'fit and proper person' check. Landlords failing to register would be subject to a fine. Those who repeatedly fail to meet their legal requirements should be removed from the register and prohibited from operating in the private rented sector.

The register would provide local authorities with basic information on the distribution of private rented housing stock in their area and private residential landlords operating locally. This would help them proactively manage the private rented sector in their areas. Local authorities could effectively target educational training and resources at amateur and accidental landlords, and effectively target enforcement work.
Better data on the size and location of private rented homes would allow local authorities to make more informed and strategic decisions about the best way to tackle poor conditions. This includes whether or not to implement selective or additional licensing schemes.

Scotland and Wales both already have landlord registration schemes. Wales has one central register, Rent Smart Wales. The scheme launched in November 2015 and registration is required for all landlords.

Scotland has had landlord registration since April 2006. The scheme is managed by local authorities. Information about registered landlords is now available on a searchable national database. A Shelter Scotland evaluation of the effectiveness of the scheme, three years after its launch, found it had helped local authorities provide advice, training and information for landlords.

The evaluation also found that complaints about bad practice had been addressed more effectively and voluntary accreditation schemes to highlight and reward good standards had been set up.[219]

For England, a national, centrally-managed register would limit the administrative burden for local authorities and landlords, allowing councils to focus on enforcing standards in the sector.[220]

Shelter Scotland's evaluation of the Scottish scheme found that some of the potential benefits were limited. This was because the scheme was administered on a local level by local authorities. They did not always have the resources to administer the register effectively, which led to an inconsistent application of the standards and use of sanctions to stop bad practice.[221] The Scottish Government is currently consulting on improvements to the scheme.

Impact

Prospective tenants and private rented sector access schemes supporting homeless people could check if a landlord is registered. This would give confidence landlords understand their rights and responsibilities.

Success could be measured by the percentage of landlords registered, the amount of successful enforcement action taken by local authorities, and long-term improvements in the sector. This would include improved conditions and reduced instances of illegal evictions.

219 Shelter Scotland (2009) *Landlord registration in Scotland: Three years on.* Edinburgh: Shelter Scotland.
220 Gousy, H., (2014) *Safe and decent homes.* London: Shelter.
221 Shelter Scotland (2009) *Landlord registration in Scotland: Three years on.* Edinburgh: Shelter Scotland.

Responsibility for change
The Westminster Government.

Make it easier for local authorities in England to introduce selective licencing schemes by removing unnecessary financial and bureaucratic barriers.
In England, the government has introduced restrictions making it more difficult for local authorities to introduce licensing schemes. Local authorities are best placed to decide whether selective licensing is the most appropriate tool to improve the private rented sector in their area. They should be given the greatest flexibility to improve conditions.

The government should extend the criteria under which local authorities can introduce selective licensing to include areas with high demand for homes and poor conditions. There is little evidence to suggest that homes in low demand areas are more likely to be in a poorer condition than homes in areas of high demand. Licensing is often most needed in areas of high demand because renters have less consumer power.[222]

Impact
In the short-term, success could be measured by the amount of successful enforcement action taken by local authorities. For example, the number of prosecutions instigated and improvement notices issued. In the long term, success could be measured by improvements in property conditions and reduced instances of illegal eviction.

Timescales
Selective licensing can have significant results in the first couple of years of operation. For example, within the first four years of Newham Council's selective licensing scheme 1,135 prosecutions were instigated for housing crimes. Twenty eight of the borough's worst landlords were banned and more than 2,000 improvement notices to tackle poor conditions were issued.[223]

Responsibility for change
The Westminster Government.

To improve security of tenure the Westminster and Welsh Governments should introduce a new standard private rented tenancy. There should be limits on annual rent increases (see the following recommendation) and an open ended period where the landlord could only give notice by using specified grounds.

If the government chooses not to do this then a new standard tenancy for the private rented sector with a longer fixed term period, for example of three to five years should be introduced.
This would help tackle the insecurity currently experienced by many private renters pending implementation of more substantive reform. Tenants would still be able to bring the tenancy to an end during the fixed-term period with an appropriate notice period.

Open-ended or longer-term tenancies are particularly important for homeless people who need stability to help them rebuild their lives. Shelter recommends that the standard minimum tenancy length should be five years. This would ensure people have enough time to put down roots in their community, find employment and access support services if they need to. It will also help them plan their finances without the fear of moving again imminently.[224]

222 Gousy, H, (2014) *Safe and decent homes.* London: Shelter.
223 Collinson, P. (2017) 'Half of landlords in one London borough fail to declare rental income', *The Guardian*, 13th August. https://www.theguardian.com/business/2017/aug/13/half-of-landlords-in-one-london-borough-fail-to-declare-rental-income
224 De Santo, R., (2012) *A better deal – towards more stable private renting.* England: Shelter.

Alongside this recommendation, the Westminster and Welsh Governments will need to take action to improve the speed and effectiveness of their court processes. This will increase landlords' confidence in offering long-term tenancies without it threatening their business in the minority of cases where significant problems arise. This might be, for example, with rent arrears or damage to the property.

Landlords' confidence in the court system's ability to respond to legitimate concerns around evicting tenants who breach agreements is one of the biggest barriers to introducing more stable and secure tenancies.[225]

Impact
This will ensure that formerly homeless people have the stability to rebuild their lives. Longer standard tenancies will also help reduce the number of people homeless because of a private rented sector tenancy ending.

The impact can be measured by looking at changes in the average length of private rented sector tenancies and the number of statutory homelessness acceptances because of a private sector tenancy ending. The impact on homeless people specifically could be gathered from Crisis Skylight Centre coaches and clients, from other homelessness organisations and private rented sector access schemes.

Introducing a new standard tenancy would require legislative change. This process should include consultation with the sector so it will inevitably take time to achieve. The impact will take several years to be felt; the change would only affect new tenancies.

Responsibility for change
The Westminster and Welsh Governments.

All new tenancies in England, Wales and Scotland should include clauses that limit annual rent increases to a maximum of an inflationary measure for the duration of the tenancy.

Setting a measure for how rents can be increased for the duration of the tenancy will provide much needed certainty for tenants. It will also help prevent tenants from becoming homeless due to unaffordable and unpredictable rent increases. Scottish tenants have more protection from rent increases than tenants in England and Wales as a result of measures introduced in *The Private Housing (Tenancies) (Scotland) Act (2016)*. This limits rent increases to one per year. It requires three months' notice and allows tenants to contact a rent officer to challenge the rent increase if they think it is too high.

The new legislation also enables local authorities to apply to the Scottish Government to approve a rent pressure zone covering all or part of their area. This limits rent increases to CPI + one percent for sitting tenants in the area for up to five years. It is too early to assess how widely rent pressure zones will be used.

Although these changes provide much more protection from rent increases for Scottish private renters, they do not give tenants the same level of certainty as a national restriction on rent increases.

Impact
Limiting rent increases to an inflationary measure will make the cost of renting more predictable for tenants. It allows them to manage their finances and avoid getting into rent arrears because of an unexpected rent increase.

Combined with longer tenancy security, this will give homeless people moving into a private rented property

225 De Santo, R., (2012) *A better deal – towards more stable private renting.* England: Shelter.

the stability they need to rebuild their lives and plan for the future. This would require legislative change in each nation, which would take some time. As above, once implemented, change would be gradual. The restriction on rent increases would only apply to new tenancies.

Responsibility for change
The Westminster, Welsh and Scottish Governments.

To improve access to stable, decent, private tenancies for homeless people the Westminster Government's Homelessness and Rough Sleeping Implementation Taskforce should introduce a nationwide help to rent and national rent deposit guarantee scheme.

While the announcement of £20 million investment in help to rent services is welcome, this does not go far enough to meet the scale of need identified. We urge government to identify further funding to deliver both help to rent projects and a national rent deposit guarantee scheme.

Access to a rent deposit guarantee is essential for clients who have been homeless and cannot afford to pay a cash deposit. It is also vital to reduce the financial risk to the landlord in case of any damage to the property. A national deposit scheme guaranteed by the government would reduce the burden on individual schemes. It would also provide help to rent projects with greater financial security so they can support more people.

The Scottish Government should review provision of private rented access schemes (help to rent) across Scotland and learning from previous central funding programmes across Great Britain to consider the case for creating a national scheme for Scotland and national funding for deposit guarantee schemes.

The Welsh Government should review provision of private rented access schemes (help to rent) across Wales and learning from previous central funding programmes across Great Britain to consider the case for creating a national scheme for Wales. This should include a rent deposit guarantee scheme to help increase access to the private rented sector.

Impact
With many local authorities already delivering help to rent services and a funding commitment in place in England there is scope to implement change quickly.

Encourage providers of private sector purpose built housing for rent (build to rent) in England to deliver homes for homeless households

Problem
A growing proportion of new homes in England, and particularly in London, are expected to come from developments that provide purpose-built housing for rent – known as build to rent.[226]

The Westminster Government has proposed that build to rent schemes will not need to provide the same range of affordable housing as developments providing homes for sale.[227] It has consulted on proposals that the affordable housing requirement on build to rent schemes can be met through the provision of 'affordable private rent' set at 80 per cent of market rents.[228] The draft National Planning Policy Framework restates this presumption.[229]

But as noted above, in many parts of the country rents at 80 per cent of market levels are not affordable to homeless people and other households on the lowest incomes. This means people on low incomes will have no access to housing on build to rent developments.

In London, while the affordable component of build to rent schemes can be entirely at 'discounted market rent' (another term for affordable private rent), the London Mayor encourages build to rent providers to let discounted market rent homes at the London Living Rent.[230]

London Living Rents are set at a third of median earnings, based on ward level data. In some areas these fall within Local Housing Allowance rates. However, our analysis found that the London Living Rent for a one-bedroom home would be higher than the relevant Local Housing Allowance rate in 55 per cent of wards. For two-bedroom homes it is higher in only 25 per cent of wards.

A key challenge in providing homes for low income households is whether discounted market rent levels (or London Living Rent levels) fall within Local Housing Allowance rates. In addition, even where rents fall within Local Housing Allowance rates, the Local Housing Allowance freeze means Housing Benefit will not keep pace with inflationary rent increases.

Chapter 10 provides more detail on the need for the freeze on Local Housing Allowance rates to be lifted. This would improve the viability of provision for people moving on from homelessness and other low income households in build to rent schemes.

There may also be scope for greater innovation in rent setting in the build to rent sector. This would enable providers to tailor solutions for low income households by exploiting opportunities for cross subsidy across schemes.

Innovation in rent setting
Dolphin Living personalised rent model
Developed for the New Era estate in Hackney, inner London, the housing charity Dolphin Living acquired the estate and worked with tenants to develop a new rent policy. Rents are set with a formula linked to tenants' incomes and the Joseph Rowntree Foundation's Minimum Income Standard rent.

Rents are set as a proportion of disposable income. They increase if tenants' earnings rise, but allow them to keep 50 per cent of disposable income above the Minimum Income Standard. There are also adjustments to allow for household size, age and needs. If the household is judged able to pay more rent, rent increases are phased in by CPI plus 4.5 per cent each year until the new target level of rent is achieved.[231]

It may also be possible to ring fence a number of properties for use as shared

226 Build to rent here refers to schemes delivering only purpose built rental housing with professionally managed stock and three year plus tenancies.
227 Department for Communities and Local Government (2017) *Planning and Affordable Housing for Build to Rent A consultation paper.* London: DCLG. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/589939/Build_To_Rent_consultation_document.pdf

228 Department of Communities and Local Government (2017) *Planning and Affordable Housing for Build to Rent: A consultation paper.* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/589939/Build_To_Rent_consultation_document.pdf
229 Ministry of Housing, Communities and Local (2018) *Draft revised National Planning Policy Framework*. https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework
230 Greater London Authority (2017) *Homes For Londoners Affordable Housing and Viability Supplementary Planning Guidance 2017.* https://www.london.gov.uk/sites/default/files/ah_viability_spg_20170816.pdf
231 Urwin, P., Gould, M. and Faggio, G. (2016) *Estimating the Value of Discounted Rental Accommodation for London's 'Squeezed' Key Workers Centre for Employment Research (CER).* London: University of Westminster http://dolphinliving.com/wp-content/uploads/FINAL-Estimating-the-Value-of-Discounted-Rental-Accommodation-2016.pdf

housing for single working adults, with rents set at multiples of the Shared Accommodation Rate. This concept is being explored by the London Borough of Lewisham.

Innovation in rent setting
Besson Street, London Borough of Lewisham:[232]
The London Borough of Lewisham is bringing forward a build to rent development on the Besson Street site in New Cross. It is working in 50/50 partnership with Grainger PLC, the UK's largest listed residential landlord.

The partnership will develop around 232 homes, including 35 per cent affordable homes to be let at the London Living Rent. The partnership will also develop a health centre for the local community, new office space for the New Cross Gate Trust and an outdoor gym aimed at improving quality, affordability and security for residents. The council is exploring how some of the scheme's London Living Rent units could be used by sharers on a low income affected by the changes to Local Housing Allowance entitlement under Universal Credit. Early scoping suggests that the margin between the rent envelope under London Living Rent and the Shared Accommodation Rate multiple on a three-bed unit provides a resource to deliver enhanced housing management to support the shared tenure.

Consultation with key stakeholders (institutional investors, local housing companies, housing associations and representatives of the residential property sector) suggests that there may be scope to deliver homes for homeless people in build to rent developments.[233] It was thought viability concerns can potentially be addressed using 'help to rent' support to help prospective tenants cover upfront costs and get benefit claims in place (where applicable), and employment support to assist households find, retain and progress in work.

Housing associations delivering build to rent housing have a particular role in testing the feasibility of such innovation. They are well placed to pilot schemes that incorporate provision for in-work homeless households. This is because of their experience of delivering housing and employment support for people on low incomes and their expertise in delivering market rent housing. Homes England, city regions and local authorities can encourage providers to pilot schemes incorporating provision for low earners.

Solution
The Westminster Government should ensure that build to rent developments meet the needs of people moving on from homelessness. To achieve this, it should do the following.

- Revise the definition of affordable private rent housing (at 80 per cent of market rents) to mirror the London Mayor's proposals. It should encourage provision targeted at households on median earnings in the ward where schemes are located. This would ensure that the affordable component of build to rent schemes is within reach of median earners. It would also open up access for households moving on from homelessness where rents fall within Local Housing Allowance rates.

- Task Homes England with inviting bids to pilot build to rent schemes. These schemes should test the viability of including some homes for council housing register nominees and homeless households at rent levels within Local Housing Allowance rates or other affordable rent benchmarks/rent setting frameworks. Pilots should address the following.

  – The role of financial advice and employment support to enable earnings progression and tenancy sustainment, and a range of delivery models for providing this support. This should include through housing providers' in-house employment support services, and through outsourcing support to specialist providers.

  – The role of bonds or other forms of rent guarantee to cover rent in advance and insure against rent losses for a fixed period.

  – The scope to use variable rents to improve viability, informed by assumptions about the extent to which tenants' financial circumstances are likely to improve over time.

Impact
The likely impact of this measure is small in the short term, with a need for further viability analysis and testing.

Responsibility for change
The Westminster Government must set the ambition that build to rent developments should provide some homes for homeless people and others on low incomes, and for redefining private affordable rent housing. The revision can be conducted as part of wider reforms to the National Planning Policy Framework currently underway.

Homes England should use its resources to incentivise local authorities and developers to collaborate on pilots, and to capture and share learning from this activity.

Plan for and provide a supply of permanent, mainstream housing that single homeless people and other low income single adult households can afford

Problem
Single homeless people have been particularly disadvantaged by the combined impact of current housing and welfare policies.[234]

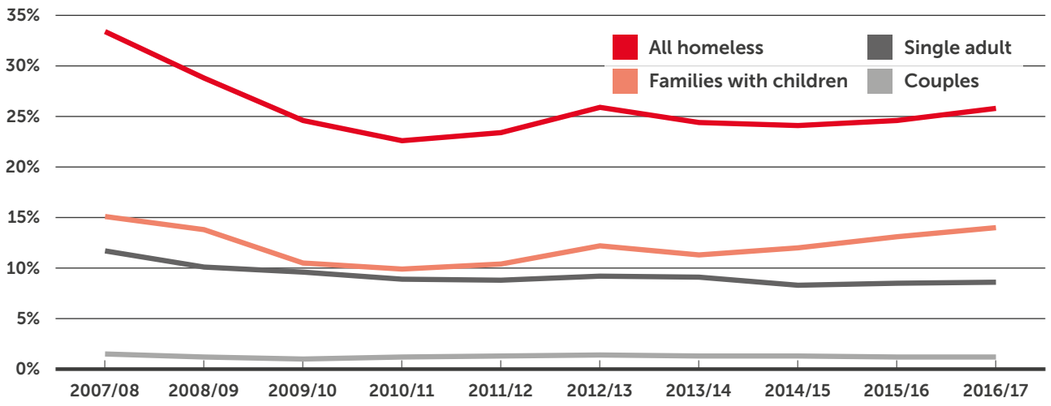
Single homeless people aged under 35 wanting to rent privately are only able to obtain Housing Benefit to cover the cost of a room in a shared house. The supply of homes at rents within the Shared Accommodation Rate is very limited. Mystery shopping research conducted by Crisis found that just 13 per cent of advertised rooms are affordable within the rate.[235] This falls to 1.5 per cent when accounting for the fact that most private landlords are unwilling to let their properties to people on Housing Benefit.

Crisis' analysis of data for England demonstrates that the number of permanent mainstream lettings to single homeless people declined from 19,000 in 2007/08 to 12,000 in 2016/17.[236] The fall as a proportion of all new lets is similar, declining from 12 per cent to eight per cent over the same period.

The 2015 survey of local authority Housing Options teams for *The*

232 Source – London Borough of Lewisham.
233 Crisis (2018) *Innovating to increase the supply of permanent mainstream housing for homeless people: Summary of roundtable discussion on 14th February 2018*. London: Crisis.
234 Homeless Link (2016) *Support for single homeless people in England – Annual Review 2016*. London: Homeless Link.; Rowe, S., and Wagstaff, T. (2017) *Moving on - Improving access to housing for single homeless people*. London: Crisis.
235 Sanders, B., and Teixeira, L. (2012) *No room available: study of the availability of shared accommodation*. London: Crisis.
236 Rowe, S., and Wagstaff, T. (2017) *Moving on - Improving access to housing for single homeless people*. London: Crisis. (Analysis updated for 2016/17).

Figure 11.5: Proportion of new social lets to new homeless households by household type



Source: DCLG (2017) Affordable Housing Supply: April 2016 to March 2017 England.

Homelessness Monitor England found that councils find it far more difficult to provide meaningful help to single homeless people than families with children.

A new focus is needed from local authorities, ensuring that they plan for the range of housing requirements needed for single homeless people. The provision should focus on self-contained housing options for single adults. But local authorities and housing providers should also consider the potential role of shared tenancies to broaden the options available to homeless single adults.

A role for shared tenancies

Sharing has become an established response to the shortage of affordable market housing for single adults, particularly in London.[237] While motives for sharing are diverse, one of the primary reasons is financial.[238] Sharing can be a choice for some. It can help them to opt for a 'nicer property', or to provide company and a greater sense of security than renting alone. But for others it is the only available housing option.[239]

Sheffield Hallam University research with low income working age single adults in England and Wales found most had a strong preference for self-contained housing.[240] However, some were prepared to accept sharing as a transitional solution. This was especially where shared tenancies provide a more affordable option than self-contained housing.

But, the research also found that there was more interest in the potential of sharing as an option where schemes are of good quality. Good quality was characterised by the researchers in the following ways.

- Managed by a socially-responsible organisation, such as a housing association or a voluntary sector organisation, that would ensure a good standard of housing management and would address antisocial behaviour.
- Having a matching service, to ensure that 'compatible' people live together.
- Providing opportunities for smaller shares (two or three people).[241]

Between 2013 and 2015, we oversaw the delivery of the Sharing Solutions programme, funded by the then DCLG. It tested the viability of eight pilot schemes delivering shared tenancies in the private rented sector. Eighty-four per cent of just over 200 tenancies created by the programme were sustained for six months or more.[242] The provision of adequate resources and staffing to deliver pre-tenancy training and tenancy sustainment support were critical to achieving these tenancy sustainment rates.

Our work supporting Sharing Solutions in the social rented sector across England, Scotland and Wales shows that some younger adults who have experienced homelessness find sharing is a viable housing option. There are examples of social landlords successfully delivering shared tenancies in both their existing stock, and in newly-built homes, and in areas of both low and high housing pressure.[243]

Bournemouth Churches Housing Association (BCHA) / Plymouth City Council shared tenancy move on

BCHA has acquired 12 new and recently built two-bedroom homes to let as shared tenancies to 24 single adults moving on from supported housing in Plymouth. Rents for each room are set at a rate broadly equivalent to the Shared Accommodation Rate (£72). There are also service charges of between £44-55 covering all costs and utilities, including an intensive management charge of £6 per room per week.

Rent and service charges in the move-on units are around half the charges tenants pay in a hostel. This makes it easier for tenants to manage the transition to employment and save for a deposit. Tenants stay on average six to 12-months before moving on.

During the first 12 months of the scheme, 11 tenants have moved into privately rented (six tenants) and social rented (five tenants) housing. Two-bedroom units (housing two sharers) are preferred to increase chances of successful tenancy sustainment. BCHA is positive about the outcomes achieved. Tenants have responded positively to the good quality housing and the opportunity to save for a deposit while developing a successful tenancy history and reference.

Despite the evidence from landlords pioneering sharing schemes, and research demonstrating a potential appetite for well managed shared accommodation, there is currently very little provision. *The Homelessness Monitor England 2017* survey of Housing Options teams found that helping under 35s get access to shared housing is almost universally problematic. Scarcity of shared housing in the social sector is an even greater problem than scarcity in the private rented sector. Seventy four per cent of councils find it very difficult to help people aged under 35 access social rented housing. This is

237 Padley, M. Hill, L. Hirsch, D. (2015) *Minimum budgets for single people sharing accommodation.* Leicestershire: Centre for Research in Social Policy, Loughborough University.
238 Padley, M. Hill, L., Hirsch, D. (2015) *Minimum budgets for single people sharing accommodation.* Leicestershire: Centre for Research in Social Policy, Loughborough University.
239 Padley, M. Hill, L., Hirsch, D. (2015) *Minimum budgets for single people sharing accommodation.* Leicestershire: Centre for Research in Social Policy, Loughborough University.
240 Clarke, A. and Heywood, A. (2016) *Feasibility study of the prospect of developing a viable housing model for those entitled only to access the shared accommodation rate.* Leicestershire: CCHPR; Reeve, K., et al. (2017). *Capping aspiration: the millenial housing challenge.* England: Sheffield Hallam University.

241 Reeve, K. et al. (2017). *Capping aspiration: the millenial housing challenge.* Sheffield: Sheffield Hallam University
242 Batty, E., Cole, I. Green, S., McCarthy, L., and Reeve, K., (2015) *Evaluation of the Sharing Solutions programme.* London: Crisis
243 Reeve, K., Green, S., Pattison, B., Wilson, I. and Cole, I. (2017). *Capping aspiration: the millenial housing challenge.* Sheffield: Sheffield Hallam University https://www.insidehousing.co.uk/insight/insight/shared-housing-the-solution-51720; Reeve, K., et al. (2017). *Capping aspiration: the millenial housing challenge.* England: Sheffield Hallam University

compared with 64 per cent for shared private rented housing.

Consultation with housing providers in Scotland revealed similar limitations. But there was also an acknowledgement by some landlords of the potential benefits of sharing schemes providing these remained a choice targeted at people with low support needs.[244]

It is clear from the experience of those already delivering shared housing that it can work.[245] There is also scope to do more to expand this sector both by converting existing stock and through new build provision. The LivShare concept offers a model for delivering purpose-built shared housing using modern methods of construction.

The LivShare concept.[246]
LivShare is a purpose-built shared housing model, designed to provide housing for young single people on low incomes. It has been developed by Andy Redfearn Consultancy, supported by Commonweal Housing, architecture practice Rogers Stirk Harbour + Partners and building consultancy Aecom. The model, currently at feasibility stage, has the potential to include provision for young single adults moving on from homelessness, and the wider population of low income single adults. The model is designed to enable communal living, but with high quality, spacious and safe private bedrooms. The feasibility study demonstrates that a scheme providing 30 rooms in five town houses could be delivered at £40,000 per unit.

Solutions
National and local governments and housing providers should provide permanent, mainstream housing that single homeless people and other low income single adult households can afford. The housing should give more choice of self-contained and shared options.

- All three national governments should update national planning guidance. It must address the need for new housing provision for single homeless adults and others unable to afford market housing. It must also consider the availability of shared and one-bedroom homes within the existing stock. Planning guidance should clarify that affordable housing definitions allow for provision of purpose built shared housing for single low earners/homeless adults to meet a proportion of identified need alongside self-contained options.
- Strategic Housing Market Assessments (England), Housing Need and Demand Assessments (Scotland) and Local Housing Market Assessments (Wales) should map existing provision for low income single adult households, including Houses in Multiple Occupation (HMOs) and access to shared tenancies/one bed homes in the existing stock and assess the scale of unmet need. This should address the needs of homeless single adults across the spectrum of support needs.
- Local authority homelessness strategies should include targets for the supply of housing that is affordable and accessible to single homeless people, taking account of supply in the social and private rented sectors, and in existing and new stock. These targets should be aligned with housing strategy and local planning policy targets.

244 CIH Scotland/Indigo House (2017) *The Introduction of the LHA Cap to the Social Rented Sector: Impact on Young People in Scotland.* Scotland: Scottish Government/CIH/Indigo House.
245 Reeve, K. et al. (2017) *Capping aspiration: the millenial housing challenge.* England: Sheffield Hallam University.
246 Feasibility report due for publication June 2018.

Responsibility for change
The Westminster, Welsh and Scottish Governments.

Ensure housing supply targets are informed by evidence on the scale of homelessness

Problem
Housing solutions to homelessness are often framed in terms of temporary housing solutions.[247] But our evidence is clear that rapid rehousing into a settled home improves outcomes for all homeless people. For more information see Chapter 7 'Rapid rehousing'.

The Heriot-Watt University research clarifies that substantially increasing the supply of social rented housing in England and Wales, and maintaining committed levels in Scotland, should be part of any strategy to end homelessness. It should also tackle wider inequalities affecting people accessing decent housing.
National and local governments should have a united ambition that their housing policies will provide permanent, decent, secure homes for all homeless people. Inherent in this ambition should be the principle that homes should be available at rent levels that enable people to become financially resilient rather than plunged further into poverty.

To achieve this ambition, it is vital that the amount of housing needed to tackle homelessness is assessed and considered in the planning system. Needs assessments should align with homelessness strategies, which should in turn inform local housing strategies and subsequent plans for the supply of housing to meet projected needs.

Solutions
National governments should require local authorities to ensure that the permanent mainstream housing needs of homeless people are taken into account through Strategic Housing Market Assessments (England), Housing Need and Demand Assessments (Scotland) and Local Housing Market Assessments (Wales). Guidance on needs assessments should require local planning authorities to consider the evidence base on homelessness alongside other relevant sources of data on housing requirements.

Responsibility for change
National governments should ensure local authorities set, monitor and report on targets for the supply of housing affordable and accessible to homeless people as part of their homelessness strategies. The reporting should identify what the local authorities will need to do to increase the availability of housing across the social and private sectors, and existing and new stock. This should include ensuring an adequate supply of housing is available to deliver Housing First (see Chapter 9 'The role of Housing First in ending homelessness'), as well as housing for other homeless households.

11.5 Conclusion

Access to affordable housing is essential to preventing and ending homlessness. This chapter sets out the role for national governments in ensuring that everyone is housed in decent accommodation, and importantly that social house building levels are significantly boosted.

Combined with reforms to the welfare system, these solutions deliver the changes needed to end homelessness over a sustained period.

247 Local Government Association (2017) *Housing our homeless households.* England: LGA.

11.6 Summary of recommendations

	England/Westminster	Scotland	Wales
Increasing the supply of housing at social rent levels	• Set a target for delivering 90,000 homes a year at social rent levels and grow investment to meet this target over 15-year period • Increase the share of government housing investment to meet the national minimum target for social rented housing through new build, acquisition and the conversion of empty/obsolete buildings • Ensure that all developing housing associations provide a proportion of new homes at rents that homeless and other low income households can afford to occupy • Prevent further erosion of the social rented housing stock by ending the policy of requiring housing associations to convert social rent homes to affordable rent • Suspend the right to buy until government puts in place a programme of investment and wider changes to reverse the decline in the supply of homes at social rents. • Extend flexibility on council housing revenue account borrowing to deliver more homes for social rent • Ensure that the rent setting framework for social housing delivers rents that are affordable to those on low earnings and in receipt of Housing Benefit. • Create a definition of affordable housing that relates housing costs to households' ability to pay, and meets the needs of low income groups.	• Maintain investment to deliver the equivalent of 5,500 homes a year at social rent levels, and ensure funding is targeted effectively to meet needs identified at local market level • Ensure that the rent setting framework for social housing delivers rents that are affordable to those on low earnings and in receipt of Housing Benefit.	• Increase the annual target for the delivery of new social rent homes to 4,000 a year, and continue to grow investment in social rented housing to deliver the equivalent of 4,000 homes a year over a 15-year period • Ensure that the rent setting framework for social housing delivers rents that are affordable to those on low earnings and in receipt of Housing Benefit.
Increase access to social renting for homeless people	• Revise national allocations guidance to ensure homeless people are not excluded from registering for social housing • Create a regulatory requirement that all registered providers of mainstream social housing set an annual guideline target for the minimum proportion of social lettings to homeless nominees and report on this publicly. • Ensure all social housing providers fulfil their responsibilities to cooperate with councils in meeting their homelessness duties and are encouraged to adopt best practice in supporting homeless people into social housing – including best practice in the use of pre-tenancy assessments. • Ensure councils and housing providers monitor and report publicly on their performance providing settled homes for homeless people. • Amend the Regulator of Social Housing (England)'s regulatory objectives to include safeguarding and promoting the interests of homeless people as well as current and future tenants (mirroring the objectives of the Scottish Housing Regulator)	• Create a regulatory requirement that all registered providers of mainstream social housing set an annual guideline target for the minimum proportion of social lettings to homeless nominees and report on this publicly. • Ensure all social housing providers fulfil their responsibilities to cooperate with local authorities in meeting their homelessness duties and are encouraged to adopt best practice in supporting homeless people into social housing – including best practice in the use of pre-tenancy assessments. • Ensure councils and housing providers monitor and report publicly on their performance providing settled homes for homeless people	• Create a regulatory requirement that all registered providers of mainstream social housing set an annual guideline target for the minimum proportion of social lettings to homeless nominees and report on this publicly. • Ensure all social housing providers fulfil their responsibilities to cooperate with councils in meeting their homelessness duties and are encouraged to adopt best practice in supporting homeless people into social housing – including best practice in the use of pre-tenancy assessments. • Ensure councils and housing providers monitor and report publicly on their performance providing settled homes for homeless people • Amend the Welsh Government's regulatory objectives to include safeguarding and promoting the interests of homeless people as well as current and future tenants (mirroring the objectives of the Scottish Housing Regulator)

	England/Westminster	Scotland	Wales
Ensure the private rented sector is fit for purpose as a housing solution for homeless people	• Require every private sector landlord to ensure any home they rent is fit for human habitation at the start of and throughout the tenancy. • Place a statutory duty on local authorities to provide a tenancy relations service. • Introduce a national register of landlords that all private landlords and lettings agencies are required to join and require private landlords and lettings agencies to submit annual data on the size (number of bedrooms) of their rental property and the level of rent they are charging. • Make it easier for local authorities to introduce selective licensing schemes by removing unnecessary financial and bureaucratic barriers • Introduce national provision of private rented access schemes (help to rent) across England, including a national rent deposit guarantee scheme. • Introduce a new standard private rented tenancy with no fixed term period where the landlord could only give notice by using specified grounds and with limits on annual rent increases linked to an inflationary measure.	• Place a statutory duty on local authorities to provide a tenancy relations service. • As part of the Scottish Landlord Register, require all private landlords and lettings agencies to submit annual data on the size (number of bedrooms) of their rental property and the level of rent they are charging. • All new tenancies should include clauses that limit annual rent increases to a maximum of an inflationary measure • Review provision of private rented access schemes (help to rent) across Scotland and learning from previous funding programmes across Great Britain, to consider the case for creating a national help to rent scheme for Scotland and national funding for rent deposit guarantee schemes.	• Place a statutory duty on local authorities to provide a tenancy relations service. • As part of Rent Smart Wales, require all private landlords and lettings agencies to submit annual data on the size (number of bedrooms) of their rental property and the level of rent they are charging. • Introduce a new standard private rented tenancy with no fixed term period where the landlord could only give notice by using specified grounds and with limits on annual rent increases linked to an inflationary measure. • Review provision of private rented access schemes (Help to Rent) across Wales and learning from previous funding programmes across Great Britain to consider the case for creating a national scheme for Wales and national funding for rent deposit guarantee schemes.
Encourage providers of private sector "build to rent" housing to deliver homes for homeless people	• Ensure that build to rent developments play a part in meeting the needs of people moving on from homelessness by revising the definition of affordable private rent housing (at 80% market rents) to encourage provision targeted at households on median earnings in the ward where schemes are located – mirroring the London Living Rent • Task Homes England with inviting bids piloting build to rent schemes that test the viability of including a proportion of homes for local authority nominees on low incomes and people moving on from homelessness.		
Plan for and provide a supply of homes that single homeless people can afford	• Update national planning guidance to ensure it expressly addresses the need for new housing provision for single homeless adults, taking account of the availability of shared and one bedroom supply in the existing housing stock • Strategic Housing Market Assessments should map existing provision for low income single adults and address the needs of single adults across the spectrum of support needs. • Local authority homelessness strategies should include targets for the supply of homes affordable and accessible to single homeless people.	• Update national planning guidance to ensure it expressly addresses the need for new housing provision for single homeless adults, taking account of the availability of shared and one bedroom supply in the existing housing stock • Housing Need and Demand Assessments should map existing provision for low income single adults and address the needs of single adults across the spectrum of support needs. • Local authority homelessness strategies should include targets for the supply of homes affordable and accessible to single homeless people.	• Update national planning guidance to ensure it expressly addresses the need for new housing provision for single homeless adults, taking account of the availability of shared and one bedroom supply in the existing housing stock • Local Housing Market Assessments should map existing provision for low income single adults and address the needs of single adults across the spectrum of support needs. • Local authority homelessness strategies should include targets for the supply of homes affordable and accessible to single homeless people.
Ensure housing supply targets are informed by evidence on the scale of homelessness	• Require local authorities to ensure that the permanent mainstream housing needs of homeless people are taken into account through Strategic Housing Market Assessments • Ensure local authorities set, monitor and report on targets for the supply of housing affordable and accessible to homeless people as part of their homelessness strategies, and identify the interventions that will be taken to increase the availability of housing across the social and private sectors and existing and new stock	• Require local authorities to ensure that the permanent mainstream housing needs of homeless people are taken into account through Housing Need and Demand Assessments • Ensure local authorities set, monitor and report on targets for the supply of housing affordable and accessible to homeless people as part of their homelessness strategies, and identify the interventions that will be taken to increase the availability of housing across the social and private sectors and existing and new stock.	• Require local authorities to ensure that the permanent mainstream housing needs of homeless people are taken into account through Local Housing Market Assessments • Ensure local authorities set, monitor and report on targets for the supply of housing affordable and accessible to homeless people as part of their homelessness strategies, and identify the interventions that will be taken to increase the availability of housing across the social and private sectors and existing and new stock.

"I came to England from Poland nine years ago.

I was working all the time. Then four years ago I was living with a man. Every month I gave him £1,000 to pay the rent... one day a letter said we had to move out. I asked the landlord why and he said we hadn't paid any money. I told him that my partner had given it to him but he said that he hadn't paid him anything.

I had to send my three-year-old daughter to stay with some family so I could stay here and try to get enough money for a new house. I had to live in a hostel and I became very depressed. I missed my daughter.

After two months I couldn't pay the rent there anymore; they said I had to leave. That's when I went on the street.

I'm applying for work through a homeless charity and I'm excited for that... I know with a room or a flat the rest won't matter. With a normal place and normal people I know I could then find a job.

I still have good contact with my daughter. She calls every day and we speak on Skype and Facebook. She's really a smart girl. And she will be beautiful. I miss her."

Jo

Chapter 12:

Ending migrant homelessness

Migrant homeless people face all the dangers that homeless people from the UK face and more. On a daily basis they must contend with suspicion about their motives, being excluded from almost all support services, and a constant threat of removal from the country.

The recent political agenda to create a 'hostile environment' for some irregular migrants has severely affected people from outside the UK who face homelessness in this country. This is regardless of their status in the UK, or reason for being here. It has also made it harder for service providers like Crisis to help people.

Although the solutions to homelessness for migrants are essentially the same as for any other people experiencing the problem, a set of policies now stands in the way. These must be changed.

12.1 Introduction

Who are 'migrant homeless people'?
Before analysing the causes and solutions to migrant homelessness it is important to define which groups are 'migrants'.

Within our plan, we use the term to refer to people who enter the UK intending to stay, but whose country of origin is not the UK. Our plan is specifically focused on migrants who are homeless or at risk of becoming so.

In practice this includes several distinct groups:

- people from within the European Economic Area (EEA)
- asylum seekers
- refugees
- undocumented migrants
- migrants with leave to remain subject to a condition of 'no recourse to public funds'.

'Undocumented migrants' describes: people without a legal right to stay in the UK; people needing to establish their right; and those with a right but without documented proof. This includes refused asylum seekers who are considered to have no basis to stay in the UK, but are unable to return to their country of origin.

Should solutions to migrant homelessness be different to those for UK nationals?
As a service provider, we do not deny elements of our help to homeless people based on their nationality or their immigration status. Our experience is that migrant homeless people have the same goals as UK nationals. They want to find stable housing as soon as possible and are strongly motivated to work if they are not already doing so.

The ideal approach to solving migrant homelessness would be to disregard the 'migrant' status, and give people the same entitlements as UK nationals.

The difficulties migrant homeless people face, as well as homelessness itself, mostly centre upon the numerous ways statutory services are restricted or denied to them. These restrictions, as detailed in this chapter, are driven by a wider political agenda to reduce net migration to the UK. The unintended consequence is to seriously hamper efforts to resolve migrant homelessness when it happens.

This chapter focuses on the reforms necessary to ensure migrants can access help to prevent or resolve their homelessness on the same basis as UK nationals. These reforms should ensure they are not further disadvantaged by their different country of origin or immigration status. It is also important to recognise that migrants may have specific needs that a homeless person from the UK is less likely to have. For example, these can include language barriers and experience of trauma, particularly for people seeking asylum in the UK.

All other chapters of this plan assume that migrant homeless people can access the same solutions to homelessness as UK nationals.

12.2 Consulting on issues and solutions – the background

During 2017 we undertook a range of consultations to gather up-to-date and relevant information about the causes, effects of, and solutions to migrant homelessness.

These consultations are outlined below.

- **An 'End Migrant Homelessness' online community** to gather and develop innovative ideas to end migrant homelessness. People from more than 40 different organisations were involved in this consultation. A group, including experts from organisations specialising in supporting people with no recourse to public funds, refugees and asylum seekers and migrant rough sleepers, also participated in follow-up workshops.[1]
- **A one-off consultation event** about the changes in public policy necessary to end migrant homelessness, with policy specialists from across the migration, asylum and refugee sectors.
- **An inquiry session** for the All Party Parliamentary Group on Ending Homelessness[2] on solutions to migrant homelessness. This included a formal evidence session in Westminster to hear directly from expert witnesses.
- **An internal consultation** with almost 450 Crisis staff that included questions about how best to improve our own support to migrant homeless people.

Each of these exercises has informed the contents of this chapter. We are particularly grateful to expert colleagues at FEANTSA, the umbrella body for homelessness organisations across Europe, who attended consultation events and provided an international perspective.

12.3 Assessing the scale of migrant homelessness

This section gives an overview of the currently available data about the numbers of homeless migrants in the UK and their immigration status. Where available, trends in this data are also presented. Data from Crisis services across England, Scotland and Wales are also presented, particularly where official statistics relating to homelessness are missing.

Migrants clearly make up a significant proportion of the rough sleeping and wider homeless population across Britain, but there are significant gaps in data that are collected or published.

EEA nationals
There are detailed and reliable data available on the scale and trends of EEA nationals who have slept rough in London. There are also indications from other data sources for the rest of the country.

In 2016/17, 39 per cent of people seen sleeping rough in London were EEA nationals – a total of 3,038 people. This has decreased over the past two years, from 46 per cent in 2015/16 (3,669 people) to 45 per cent in 2014/15 (3,359 people).[3]

1 This online community ran from 15 August to 27 September 2017, and was followed up by a series of service design workshops in October and November. Crisis convened this community with the help of 100%Open, an open innovation agency.
2 APPG for Ending Homelessness (2017, 27 November) The APPG for Ending Homelessness Inquiry Session, Migrant homelessness. London: Crisis. https://www.crisis.org.uk/ending-homelessness/appg-for-ending-homelessness/
3 Mayor of London (2017) *CHAIN Annual Report Greater London April 2016 – March 2017*. https://files.datapress.com/london/dataset/chain-reports/2017-06-30T09:03:07.84/Greater%20London%20full%202016-17.pdf; Mayor of London (2016) *CHAIN Annual Report Greater London April 2015 – March 2016*. https://files.datapress.com/london/dataset/chain-reports/2016-06-29T11:14:50/Greater%20London%20full%202015-16.pdf; Mayor of London (2015) *CHAIN Annual Report Greater London April 2014 – March 2015*. https://files.datapress.com/london/dataset/chain-reports/CHAIN%20Greater%20London%20full%20report%202014-15.pdf

Table 12.1 EEA national rough sleepers in London

Year	Number of EEA national rough sleepers (London)	Percentage of all rough sleepers
16/17	3,038	39%
15/16	3,669	46%
14/15	3,359	45%

Source: CHAIN

In 2017 the rough sleeping count for England showed a six per cent increase in the number of non-UK rough sleepers from European Union (EU) countries, from 714 in 2016[4] to 760 in 2017.[5]

These numbers are a snapshot figure indicating the number of people sleeping rough on a single night in autumn. They should be viewed with caution – much of the data is based on local authority estimates and not actual counts.

The number and proportion of new Crisis clients with EU/EEA citizenship has declined over the last three years. Although this trend is not consistent across all services, overall the percentage of new clients with EU/EEA citizenship has declined from 15 per cent in 2014/15 to ten per cent in 2016/17.

The numbers of EEA nationals applying for statutory homelessness services in England and Scotland is set out later in this chapter. No equivalent figures are available for Wales.

Research from the Joseph Rowntree Foundation examining the scale of destitution in the UK[6] estimated that 139,145 migrant households experience destitution annually. Of these 33 per cent are EEA nationals.

The research only considered people in contact with voluntary sector services. It found that EEA nationals are less likely to report receiving financial or other help from charities than other migrant groups. This means that the research most likely underestimates the number of destitute EEA nationals in the UK.

Although not all destitute migrants will have experienced homelessness, their low level of income and difficulty meeting their basic needs make them extremely vulnerable to homelessness. A significant proportion of the EEA nationals surveyed for this research reported that they had slept rough in the past month or experienced other forms of homelessness, such as sofa surfing or staying in night shelters.

Asylum seekers and refugees

Comprehensive information about the numbers of asylum seekers and refugees who have experienced homelessness is not available. However, data are available for London through the CHAIN database, and estimates are also available nationally from third sector organisations providing support for asylum seekers and refugees.

4 MHCLG Rough sleeping statistics England autumn 2016: table 2. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2016

5 MHCLG Rough sleeping statistics England autumn 2017: table 2b. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017#history

6 Fitzpatrick, S., Bramley, G., Sosenko, F., Blenkinsopp, J., Johnsen, S., Littlewood, M., Netto, G. and Watts, B. (2016) *Destitution in the UK*. York: Joseph Rowntree Foundation

In 2017, there were 26,350 applications for asylum to the UK. The number of applications has declined since they peaked in 2015 at 32,733 applications, following an upward trend from 2011 to 2015.[7]

The Joseph Rowntree Foundation's research into destitution found that the largest proportion of destitute migrants in the UK were current or former asylum seekers. This group accounted for 38 per cent of all destitute migrants. Of these, 36 per cent had leave to remain or refugee status, 41 per cent were awaiting a decision on their application and nine per cent had been refused asylum. A further 13 per cent were not clear about their status.[8] This suggests that asylum seekers and newly recognised refugees are particularly at risk of homelessness.

Since 2014/15 the number of rough sleepers in London whose last settled base was asylum support accommodation (see table 12.2) has increased.[9] This could include both newly recognised refugees and refused asylum seekers.

Similarly, the percentage of new Crisis clients who approached because they had nowhere to live after leaving asylum accommodation has increased from three per cent in 2014/15 to seven per cent in 2016/17 (see table 12.3).

Table 12.2 EEA national rough sleepers whose last settled base was asylum accommodation in London

Year	Number of rough sleepers whose last settled base was asylum accommodation (London)	Percentage of all rough sleepers
16/17	74	3%
15/16	34	1%
14/15	10	0%

Source: CHAIN

Data from voluntary organisations supporting refugees and asylum seekers indicates the numbers of asylum seekers and refugees who are struggling to meet their basic needs, and are at high risk of homelessness.

The British Red Cross is the largest third sector organisation providing support for refugees and asylum seekers in the UK. This support includes providing food vouchers, food parcels, second-hand clothes, bus passes and hardship funds. In 2015, the British Red Cross supported 9,138 asylum seekers, refused asylum seekers and refugees. Most people receiving this support were asylum seekers (53%) and a further 25 per cent had been granted some form of protection in the UK.[10]

7 Refugee Council (2018) *Asylum statistics annual trends, February 2018*. https://www.refugeecouncil.org.uk/assets/0004/2566/Asylum_Statistics_Annual_Trends_Feb_2018.pdf

8 Fitzpatrick, S., Bramley, G., Sosenko, F., Blenkinsopp, J., Johnsen, S., Littlewood, M., Netto, G. and Watts, B. (2016) *Destitution in the UK*. York: Joseph Rowntree Foundation.

9 Mayor of London (2017) *CHAIN Annual Report Greater London April 2016 – March 2017*. https://files.datapress.com/london/dataset/chain-reports/2017-06-30T09:03:07.84/Greater%20London%20full%202016-17.pdf; Mayor of London (2016) *CHAIN Annual Report Greater London April 2015 – March 2016*. https://files.datapress.com/london/dataset/chain-reports/2016-06-29T11:14:50/Greater%20London%20full%202015-16.pdf; Mayor of London (2015) *CHAIN Annual Report Greater London April 2014 – March 2015*. https://files.datapress.com/london/dataset/chain-reports/CHAIN%20Greater%20London%20full%20report%202014-15.pdf

10 Mayblin, L. and James, P. (2017) *Asylum and refugee support: civil society filling the gaps?* Coventry: University of Warwick, Economic and Social Research Council.

Table 12.3 Number of new Crisis clients who 'had nowhere to live after leaving asylum accommodation' (data is for Crisis financial year July – June)

New clients who had nowhere to live after leaving asylum accommodation						
Skylight	**Number of clients 14/15**	**Percentage of clients 14/15**	**Number of clients 15/16**	**Percentage of clients 15/16**	**Number of clients 16/17**	**Percentage of clients 16/17**
London	41	3%	68	4%	237	15%
Rest of GB	123	3%	243	5%	232	4%
Total (GB, including London)	164	3%	316	5%	478	7%

Source: Crisis

The UK-wide No Accommodation Network (NACCOM) has 50 members providing accommodation and support to destitute asylum seekers, refugees and migrants with no recourse to public funds. In 2016/17, NACCOM's members provided accommodation for 824 refugees who faced significant obstacles to accessing mainstream housing after their asylum support accommodation ended.[11]

Data from the rough sleeping count for England showed that the number of non-UK rough sleepers from outside the EU did not change between 2016 and 2017. A total of 194 non-UK and non-EU rough sleepers were counted in 2016 and 193 in 2017. Within this there was a slight increase in London, from 115 people in 2016 to 127 in 2017, and a corresponding decrease in the rest of England.[13] These numbers should be viewed with caution as much of the data is based on local authority estimates.

In 2016/17, seven per cent of new Crisis clients reported no citizenship status. This has increased from five per cent in 2014/15. This means that clients reported that they do not have British or Irish citizenship; EU/EEA citizenship; a work permit; indefinite or exceptional leave to remain; or refugee status. This indicates that they may be undocumented migrants. Although it does not automatically infer this and there could be other reasons why individuals identify themselves in this way.

Undocumented migrants

There are several reasons why migrants may lack the documents to prove their immigration status. It is not possible to definitively say how many undocumented migrants are in the UK or what proportion is homeless or have been so.

London School of Economics research estimates that at the end of 2007 the number of undocumented migrants in the UK, including children, was around 618,000. This was the central estimate of a range from 417,000 to 863,000, which highlights the uncertainty of this number.[12] This figure is now out of date and a current estimate of the number of undocumented migrants in the UK could be very different.

11 NACCOM (2018) *Evidence for APPG on Ending Homelessness*. https://naccom.org.uk/submission-appg-ending-homelessness-recommendations-change/

12 Gordon, I., Scanlon, K. Travers, T. and Whitehead, C. (2009) *Economic impact on the London and UK economy of an earned regularisation of irregular migrants to the UK*. GLA: London.

13 MHCLG Rough sleeping statistics England autumn 2016: table 2. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2016 and MHCLG Rough sleeping statistics England autumn 2017: table 2b. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017#history

Table 12.4 New Crisis clients with no citizenship status (data is for Crisis financial year July – June)

New clients with no citizenship status						
Skylight	**Number of clients 14/15**	**Percentage of clients 14/15**	**Number of clients 15/16**	**Percentage of clients 15/16**	**Number of clients 16/17**	**Percentage of clients 16/17**
London	63	4%	116	7%	154	10%
Rest of GB	223	6%	160	4%	328	6%
Total (GB including London)	286	5%	403	7%	503	7%

Source: Crisis

We do not know how many refused asylum seekers are currently in the UK. Analysis of Home Office data, showing the number of asylum seekers refused asylum and not known to have left the country, estimated that there were approximately 400,000 refused asylum seekers living in the UK in 2015.[14]

Asylum seekers who have exhausted all rights of appeal are likely to be the largest group of undocumented migrants experiencing destitution.[15] Local studies have shown that refused asylum seekers are often destitute for long periods ranging from a number of months to several years.[16]

The Joseph Rowntree Foundation's research into destitution found that 29 per cent of destitute migrants in the UK were neither EEA nationals nor current or former asylum seekers. A significant minority of asylum seekers reported they were unsure of their status, or that their application had been refused. The research found migrants in these groups had the lowest income of all groups experiencing destitution. They were also most likely to have recently experienced rough sleeping or other forms of homelessness.[17]

Data collected by organisations providing support for destitute migrants also helps indicate the number of undocumented migrants who are homeless or at high risk of homelessness. In 2016/17, NACCOM's members provided accommodation for 840 destitute refused asylum seekers who could not access asylum accommodation because they did not meet the very narrow criteria for support.[18]

14 Mayblin, L. and James, P. (2017) *Asylum and refugee support: civil society filling the gaps?* Coventry: University of Warwick, Economic and Social Research Council.

15 Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants*. York: Joseph Rowntree Foundation.

16 Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants*. York: Joseph Rowntree Foundation.

17 Fitzpatrick, S., Bramley, G., Sosenko, F., Blenkinsopp, J., Johnsen, S., Littlewood, M., Netto, G. and Watts, B. (2016) *Destitution in the UK*. York: Joseph Rowntree Foundation.

18 NACCOM (2018) *Evidence for APPG on Ending Homelessness*. https://naccom.org.uk/submission-appg-ending-homelessness-recommendations-change/

Table 12.5 Applications for homelessness assistance in Scotland

	12/13	13/14	14/15	15/16	16/17
British citizens or EEA-nationals (pre EU expansion in 2004) or Switzerland	37,210	34,305	33,050	32,030	31,480
Nationals of A8 countries or other countries to have joined the EU since 2004	1,195	1,175	1,105	1,085	980
Non-EEA nationals lawfully present in the UK	1,505	1,255	1,685	1,670	1,445
Not eligible for assistance	120	80	105	140	190

Source: Scottish Government

In 2015, ten per cent of the 9,138 asylum seekers, refused asylum seekers and refugees supported by the British Red Cross were refused asylum seekers who had exhausted all appeals rights.[19] This provides an indication of the potential level of need. However, it does not give a comprehensive picture as it does not include the support provided by smaller organisations, or those who do not seek help from voluntary organisations.

Nearly two-thirds of NACCOM members reported an increase in destitute people seeking support from their service in 2016/17. Collectively at least 1,118 destitute people were turned away from NACCOM members' services in the same period. This is considered a highly conservative estimate, as not all members were recording this information.[20]

Statutory homelessness

English local authority data show the number of non-UK nationals who applied for homelessness assistance and the number of applications that were accepted. This is broken down into A10 nationals,[21] other EEA nationals and non-EEA nationals.[22]

In 2016 in England, 20,640 foreign nationals applied for homelessness assistance; of these 10,920 applications were accepted. Of these acceptances, 2,350 applications were from A10 nationals, 2,960 applications were from other EEA nationals and 5,610 applications were from non-EEA nationals. Approximately one fifth (18%) of the total number of people accepted as statutory homeless in 2016 were migrants.[23]

No equivalent data is available for Wales.

Data from Scotland (see table 12.5) shows a breakdown by local authority of applications for homelessness assistance of people who are:[24]

- British citizens or nationals of one of the EEA countries, pre-EU expansion in 2004, or Switzerland
- nationals of one of the A8 countries,[25] which joined the EU in 2004, or other countries to have joined the EU since
- not British or EEA nationals, but are lawfully present in the UK and meet the criteria for eligibility
- not eligible for assistance under homelessness legislation.

12.4 Exploring the political context

Homelessness policy is a matter of devolved responsibility in each nation, but the Westminster Government has responsibility for immigration policy. There are no stated strategies for dealing with migrant homelessness at either level.

In a wider context, the Westminster Government's immigration policy aims to reduce net migration to sustainable levels to address concerns about the pressures on housing, public services and wages.[26]

A key part of the government's strategy for achieving this involves creating a 'hostile environment'[27] for migrants who they believe are not here legally. The policy was first mentioned by Theresa May, then Home Secretary, in 2012 when she stated: "The aim is to create here in Britain a really hostile environment for illegal migration."[28] This involved making it more difficult for irregular migrants to get work, housing and financial services – measures introduced through *The Immigration Act (2014)* and *The Immigration Act (2016).*

This approach to immigration reform and tackling irregular immigration has not considered the impact on either creating homelessness for migrants, or in holding back attempts to end homelessness for this group. The next section details the policies that have had an important impact.

12.5 Outlining policies relevant to homelessness

The following policy changes were identified by consultation participants as having a direct impact on migrant homelessness.

The Asylum and Immigration Act (1999)

This legislation created a new system of support arrangements for asylum seekers. It removed asylum seekers from the main benefits system and created a new safety net support system that is funded and administered by the Home Office.

Under section 95 of the Act, destitute asylum seekers can apply for accommodation and subsistence support. This support will continue for families if their asylum claim is unsuccessful and there is a child in

19 Mayblin, L. and James, P. (2017) *Asylum and refugee support: civil society filling the gaps?* Coventry: University of Warwick, Economic and Social Research Council.
20 NACCOM (2018) *Evidence for APPG on Ending Homelessness*. https://naccom.org.uk/submission-appg-ending-homelessness-recommendations-change/
21 A10 nationals are people from one of the ten countries that joined the EU in May 2004. This includes Cyprus, Czech Republic, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Slovakia and Slovenia.
22 MHCLG Live Table 785. https://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness#statutory-homelessness-and-prevention-and-relief-live-tables
23 Parliamentary Office of Science and Technology (2017) *Migrants and housing*. http://researchbriefings.files.parliament.uk/documents/POST-PN-0560/POST-PN-0560.pdf
24 Scottish Government shared data tables with us

25 A8 nationals are people from one of the eight countries that joined the EU in May 2004. This comprises Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia and Slovenia.
26 Amber Rudd MP, Speech to Conservative Party Conference 2016. http://press.conservatives.com/post/151334637685/rudd-speech-to-conservative-party-conference-2016
27 The government are now referring to this as the 'compliant environment'. https://hansard.parliament.uk/Commons/2018-04-30/debates/E7547DA9-5D22-4EC0-BAB4-8FC71BD2E1F9/Windrush#contribution-F4C953D1-BC64-49AF-9288-9D1A29ED4243
28 Kirkup, J. and Winnett, R. (2012) Theresa May interview: 'We're going to give illegal migrants a really hostile reception', *The Telegraph,* 25th May. http://www.telegraph.co.uk/news/uknews/immigration/9291483/Theresa-May-interview-Were-going-to-give-illegal-migrants-a-really-hostile-reception.html

the family under 18 years old when the asylum claim is finally determined. The Act allows for accommodation to be provided with no choice about location. Section 4 of the Act allows for the provision of support for refused asylum seekers in limited circumstances.

Five-year strategy for asylum and immigration, February (2005)[29]
This strategy set out the government's planned changes to comprehensively reform the immigration and asylum process. The stated aims were to build on existing policy success to strengthen border control, reduce asylum application levels and increase the number of removals of refused asylum seekers.

The strategy included changes to the status granted to new refugees. As a result, refugees are no longer granted indefinite leave to remain. Instead they receive temporary leave, usually for five years.

The Legal Aid, Sentencing and Punishment of Offenders Act (2012)
This legislation made substantial cuts to the types of cases eligible for legal aid in England and Wales. As a result, legal aid is not available for the following areas of law:

- immigration status problems, except for: detention cases; application for leave to remain under the domestic violence rule; applications for leave by those identified as victims of trafficking; and many asylum cases and appeals

- advice on all welfare benefit matters, including advice on how to challenge unfair or wrong decisions or inaccurate assessments of personal circumstances made by the Department of Work and Pensions (DWP)

- housing cases, except where a person's home is at immediate risk or where housing disrepair poses a serious threat to health.[30]

In Scotland, all matters relating to immigration, nationality and asylum are eligible for legal aid.

The Housing Benefit (Habitual Residence) Amendment Regulations (2014)
This amended the Housing Benefit Regulations to restrict access to Housing Benefit for job-seeking EEA nationals who made a new claim for Housing Benefit on or after 1 April 2014.

Previously, if an EEA national was receiving income-based Job Seekers Allowance (JSA) they would also be entitled to Housing Benefit. Under the new regulations, EEA nationals engaged in 'genuine and effective' employment will continue to have the same right to Housing Benefit as UK nationals. They will be able to retain their worker status, and associated eligibility for Housing Benefit, for up to six months after they stop working.

EEA nationals who have not retained their worker status, for example because they have never worked in the UK, may be entitled to claim JSA for a limited period. However, they are no longer eligible for Housing Benefit.

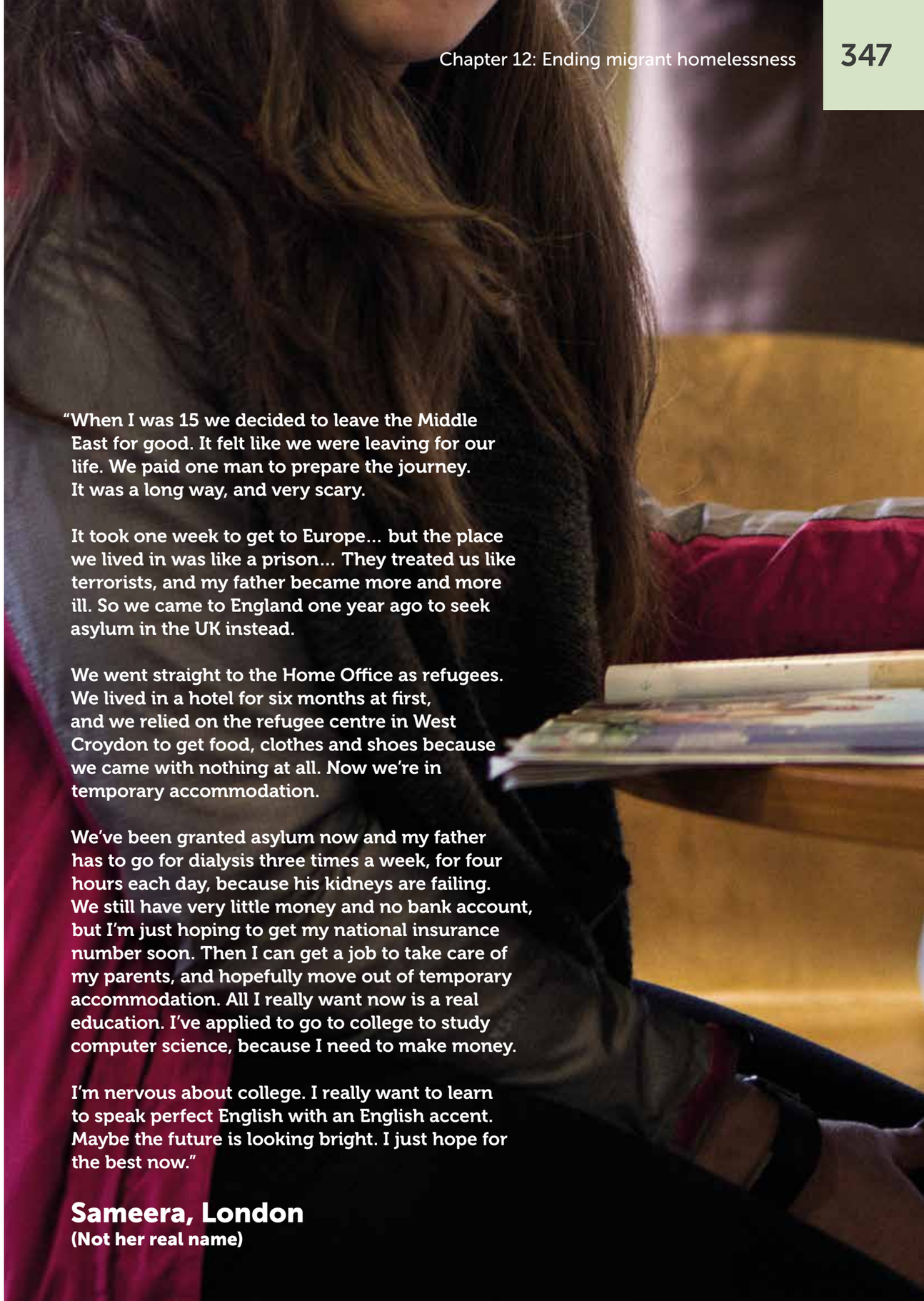
The Immigration Act (2014)
The Immigration Act (2014) put in place measures intended to reduce irregular immigration and make it more difficult for irregular migrants to live and work in the UK. The legislation:

- reduced the number of decisions that can be appealed, replacing appeal rights in these cases by administrative review

- introduced the right to rent policy for

29 Home Office (2005) *Controlling our borders: Making migration work for Britain. Five year strategy for asylum and immigration*. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/251091/6472.pdf

30 Sandbach, J. (2012) *Out of scope, out of mind: Who really loses from legal aid reform*. London: Citizens Advice Bureau.



"When I was 15 we decided to leave the Middle East for good. It felt like we were leaving for our life. We paid one man to prepare the journey. It was a long way, and very scary.

It took one week to get to Europe… but the place we lived in was like a prison… They treated us like terrorists, and my father became more and more ill. So we came to England one year ago to seek asylum in the UK instead.

We went straight to the Home Office as refugees. We lived in a hotel for six months at first, and we relied on the refugee centre in West Croydon to get food, clothes and shoes because we came with nothing at all. Now we're in temporary accommodation.

We've been granted asylum now and my father has to go for dialysis three times a week, for four hours each day, because his kidneys are failing. We still have very little money and no bank account, but I'm just hoping to get my national insurance number soon. Then I can get a job to take care of my parents, and hopefully move out of temporary accommodation. All I really want now is a real education. I've applied to go to college to study computer science, because I need to make money.

I'm nervous about college. I really want to learn to speak perfect English with an English accent. Maybe the future is looking bright. I just hope for the best now."

Sameera, London
(Not her real name)

England only. This prevents migrants who do not have leave to remain in the UK from renting in the private rented sector. It also places a duty on landlords to check if prospective tenants have a right to rent

- introduced a health surcharge that migrants seeking leave to enter or remain in the UK must pay to access NHS services

- prohibited banks and building societies from opening a current account for a person who is in the UK, but who does not have leave to enter or remain in the UK

- introduced new powers to check driving licence applicants' immigration status before issuing a licence, and revoke licensing where immigrants are found to have overstayed in the UK.

The Immigration Act (2016)

The Immigration Act (2016) expanded some of the measures from *The Immigration Act (2014)* and introduced new measures to make the UK a less attractive place for irregular migrants. The legislation:

- introduced new measures aimed at enforcing labour market standards, and increased the civil and criminal penalties for employers who employ a person without the right to work

- made it a criminal offence for landlords to knowingly rent to a person disqualified from renting by their immigration status

- gave landlords new powers to evict people who do not have a right to rent

- introduced new restrictions on driving in the UK or holding a current bank account for those without leave to enter or remain in the UK

- repealed section 4(1) of *The Immigration and Asylum Act (1999)* which had enabled detainees in immigration detention to apply for accommodation from the Secretary of State before their release from detention if they would otherwise be destitute upon release

- abolished the provision for support for refused asylum seekers under section 4(2) of *The Immigration and Asylum Act (1999)*. This will be replaced with a new form of support called section 95A support with more limited eligibility criteria. It will not include a right of appeal if an application for support is refused. These provisions have not yet come into force.

The National Health Service (Charges to Overseas Visitors) (Amendment) Regulations (2017)

Regulations have been in place for several years to charge for some NHS services for persons who are not ordinarily resident in the UK. Patients who may not be eligible for free care include most short-term visitors, many undocumented migrants, and some asylum seekers whose claims have been refused. Charging was restricted to services provided in a hospital setting.

In 2017 the regulations were amended to:

- extend NHS services that must be charged for to include: secondary care provided outside the hospital; and care provided by community health services, charities and community interest groups

- introduce up-front charging – NHS services providing chargeable care must secure payment for an estimated amount of care required before providing the service, unless the care is deemed immediately necessary or urgent.

These regulations only apply to England.

12.6 Examining the impact of these policies and proposed solutions

General policy impact

The policy to create a hostile environment for people in the UK without legal permission has serious consequences for migrants with unresolved immigration status, migrants with status and UK citizens. Although the hostile environment is aimed at people without valid leave to be in the UK, there are regular reports of people with a lawful right to be here being caught up in the system. These include UK and EU nationals and non-EU nationals with valid leave.[31] The recent 'Windrush' scandal has brought to public attention the human impact of this approach.[32]

One especially damaging aspect of the government's hostile environment is the increase in secondary immigration control. This makes private citizens and public bodies – including banks, landlords and the NHS – responsible for immigration enforcement. It prevents people from accessing services that meet their basic needs.

This can be a cause of homelessness and destitution for migrants, for example because someone's bank account is closed or they are evicted from a private rented sector property. It also makes it much more difficult for all homeless people to access the services they need to move out of homelessness. Charities and voluntary organisations have provided evidence to the Home Office showing increased homelessness and difficulties finding accommodation for people with complicated documentation as a result of the right to rent.[33]

The complexity of the immigration system and application process makes it very difficult for people to navigate the system successfully without specialist legal support. The House of Commons Home Affairs Select Committee, in its recent immigration policy report, raised concerns about the system's complexity and the complicated and sometimes apparently contradictory information provided online by the Home Office.[34] The Law Commission is currently reviewing the immigration rules with the aim of redrafting them to be simpler and more accessible.[35]

Even where people can get immigration advice, navigating this complex system successfully is likely to be a lengthy process. It can be extremely difficult without stable accommodation and funds to meet basic needs, such as food, clothing and travel to appointments.[36]

31 House of Commons Home Affairs Committee (2018) *Immigration policy: basis for building consensus. Second Report of Session 2017-19*. https://publications.parliament.uk/pa/cm201719/cmselect/cmhaff/500/500.pdf

32 BBC News (2018) 'Windrush: What is the 'hostile environment' immigration policy?' *BBC News*, 20th April. http://www.bbc.co.uk/news/av/uk-politics-43831563/windrush-what-is-the-hostile-environment-immigration-policy?intlink_from_url=http%3A%2F%2Fwww.bbc.co.uk%2Fnews%2Ftopics%2Fc9vwmzw7n7lt%2Fwindrush-deportation-rowandlink_location=live-reporting-map

33 Patel, C. and Peel, C. (2017) Passport Please: *The impact of the Right to Rent checks on migrants and ethnic minorities in England*. London: Joint Council for the Welfare of Immigrants. http://www.jcwi.org.uk/sites/default/files/2017-02/2017_02_13_JCWI%20Report_Passport%20Please.pdf

34 House of Commons Home Affairs Committee (2018) *Immigration policy: basis for building consensus. Second Report of Session 2017-19*. https://publications.parliament.uk/pa/cm201719/cmselect/cmhaff/500/500.pdf

35 Law Commission (2017) *Thirteenth Programme of Law Reform*. London: Law Commission.

36 Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants*. York: Joseph Rowntree Foundation.

The Home Office can take a long time to process and make decisions on immigration applications, and the scale of errors and delays in the immigration system is concerning. A significant proportion of immigration decisions are overturned on appeal, including a high number of asylum applications.[37]

The Parliamentary and Health Service Ombudsman has identified problems with immigration casework, including procedural errors, delays and poor decision-making. The uphold rate for complaints to the ombudsman about the Home Office has increased steadily over the last three years.[38]

A recent consultation exercise by the Strategic Alliance on Migrant Destitution found that destitute migrants may avoid organisations and authorities they fear might report them to the Home Office.[39] Recent reports about homelessness charities' links to immigration enforcement can also be expected to make migrants less likely to engage with homelessness services. This is out of fear that it will lead to detention and deportation.[40]

Evidence to the Health Select Committee from Doctors of the World, National AIDs Trust and Voice of Domestic Workers shows that Home Office and NHS data sharing makes some migrants too frightened to access healthcare.[41]

Evidence suggests Westminster Government policies aimed at creating a hostile environment for people in the UK without legal permission are making homeless migrants reluctant to approach homelessness services for support. Migrants must be able to trust that homelessness services will work with them to provide support and help them identify their options. This trust is vital so they can make informed decisions about what steps to take to resolve their homelessness.

Homelessness services should not be required to share information with the Home Office about people they are working with for immigration purposes. The exceptions should be information relating to serious crime, public safety or high risk individuals.

The impact of specific policies and recommendations for reform are set out in the following section.

37 All Party Parliamentary Group on Refugees (2017) Refugees Welcome? The experience of new refugees in the UK. https://www.refugeecouncil.org.uk/assets/0004/0316/APPG_on_Refugees_-_Refugees_Welcome_report.pdf

38 Parliamentary and Health Service Ombudsman (2016) *Complaints about UK government departments and agencies, and some UK public organisations 2015–16*. https://www.ombudsman.org.uk/sites/default/files/Complaints_about_parliamentary_departments_2015-16.pdf

39 Malfait, R., Cottrell, S. and Fylnn, N. S. (2017) *Migrant destitution: survey and consultation, commissioned by the Strategic Alliance on Migrant Destitution*. https://www.homeless.org.uk/sites/default/files/site-attachments/SAMD%20Destitution%20Survey%20Summary%20Report%20June%202017.pdf

40 Taylor, D. (2017) 'Charities referring rough sleepers to immigration enforcement teams', *The Guardian*, 7th March. https://www.theguardian.com/society/2017/mar/07/charities-giving-home-office-details-of-rough-sleepers-says-report

41 House of Commons Health and Social Care Committee (2018) *Oral evidence: Memorandum of understanding on data-sharing between NHS Digital and the Home Office, HC 677, 16 January 2018*. http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/health-committee/memorandum-of-understanding-on-datasharing-between-nhs-digital-and-the-home-office/oral/77354.html

Right to rent policy

Problem
The right to rent scheme was introduced in *The Immigration Act (2014)*. It requires private landlords and letting agents to check that tenants have a right to rent for any tenancies starting after 1 February 2016. The scheme only applies to England.

New measures introduced in *The Immigration Act (2016)* mean that landlords and letting agents will now face criminal charges. They may get an unlimited fine or a prison sentence if they rent their property to someone who does not have the right to rent.

The evaluation of right to rent in Birmingham found that the scheme was causing homelessness and making it more difficult for people without documentation to access private rented accommodation.[42]

Research carried out by the Joint Council for the Welfare of Immigrants found that foreign nationals are being discriminated against. Forty two per cent of landlords surveyed stated they were less likely to rent to people who do not have a British passport because they feared criminal sanctions if they made a mistake under the legislation.[43] The Mayor of London stated his opposition to the policy in the draft London Housing Strategy based on evidence that it is discriminatory.[44]

Solution
End the right to rent policy so landlords are no longer responsible for checking their tenants' immigration status.

Impact
Ending the right to rent would remove the threat of criminal charges and fines for landlords who rent to migrants who have irregular status. This should make landlords more willing to rent properties to homeless people, migrants, people of black and minority ethnic backgrounds and people with less easily recognisable documentation.

There is no clear evidence that the scheme fulfils the government's aims to encourage irregular migrants to leave the UK, or to effectively target rogue landlords who exploit migrants. An inspection of the scheme carried out by the Independent Chief Inspector of Borders and Immigration found it has 'yet to demonstrate its worth as a tool to encourage immigration compliance'.[45]

Responsibility for change
The Home Office is responsible for the right to rent policy.

42 Home Office (2015) *Evaluation of the Right to Rent scheme: Full evaluation report of phase one*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/468934/horr83.pdf

43 Patel, C. and Peel, C. (2017) *Passport Please: The impact of the Right to Rent checks on migrants and ethnic minorities in England*. London: Joint Council for the Welfare of Immigrants.

44 Mayor of London (2017) *London Housing Strategy, draft for public consultation, September 2017*. London: Greater London Authority.

45 Bolt, D. (2018) *An inspection of the "Right to Rent" scheme*. London: Independent Chief Inspector of Borders and Immigration.

Charging for NHS services

Problem
Regulations effective in August and October 2017 have increased the types of NHS-funded secondary healthcare that some categories of overseas visitors and migrants must pay for. These regulations apply to England only.

The regulations introduce charges for a wide range of community health services. These include community midwifery, some community mental health services and, under some circumstances, drug and alcohol services and specialist services for homeless people. Primary care services, including accident and emergency and GP services, remain not subject to charging.

Any organisation providing NHS-funded secondary healthcare is now legally required to make and recover charges from patients liable to charges. This means they must check every patient before they receive a service to determine whether they should pay for their care.

Patients who may not be eligible for free NHS-funded secondary healthcare include most short-term visitors, many undocumented migrants and some asylum seekers whose claims have been refused. Some vulnerable groups of migrants are exempt from charges, including asylum seekers, refused asylum seekers in receipt of support and victims of modern slavery.

Under the new regulations all non-urgent treatment has to be paid for up front. Non-urgent treatment is that which clinicians consider can wait until the patient is reasonably expected to leave the UK.

Studies show that one in five service users sampled who attended the Doctors of the World clinic were affected by health care charging. Of these, over one third were deterred from seeking healthcare and had delayed treatment. The reasons they gave included fears of incurring debt or fear of their details being shared with the Home Office. This was reported to have had significant negative effects on migrants' physical, psychological and social well-being.[46]

The application of the regulations will also affect people who have a legal right to reside in the UK, but may not have adequate documentation to prove their legal status, such as homeless people.

The Department of Health and Social Care is currently undertaking a review of the impact of the 2017 regulations.

Solution
We recommend that the new regulations are reversed.

If the regulations remain in place, then it is essential that guidance for healthcare providers clearly sets out a wide range of evidence that patients can provide to prove they have a right to access free healthcare. Acceptable evidence should include documentation from a homelessness organisation that can vouch for the person's circumstances. This will help ensure that homeless people are not prevented from getting healthcare because they do not have the right documents.

The government should drop plans to extend charging into other healthcare services (accident and emergency and GP services).

Impact
This would ensure that vulnerable people are not denied access to healthcare or discouraged from seeking the healthcare they need due to a fear of being charged.

Responsibility for change
The Department of Health and Social Care is responsible for these regulations.

Access to bank accounts

Problem
The Immigration Act (2014) requires banks and building societies to carry out an immigration status check for any person opening a new current account.

The Immigration Act (2016) requires banks and building societies to carry out a status check of every current account holder against a Home Office supplied database. This includes details of people the Home Office regards as liable for removal or deportation because they are over-stayers, refused asylum seekers or they have evaded immigration enforcement.

A recent examination of current immigration measures by the Independent Chief Inspector of Borders and Immigration found that out of a sample of 169 cases on the database, ten per cent should never have been listed as 'disqualified persons'. This is because they had leave to remain or an outstanding application or appeal.[47]

Homeless people and newly recognised refugees already face significant barriers to opening bank accounts due to the identification and proof of address often required by banks. Banks must ask for proof of ID when someone is opening a bank account, for example a passport. If someone does not have the usual forms of ID, the bank may consider certain other documents. This could be a letter from a homelessness organisation that the person is receiving support from, or a letter from an employer.

However, banks do not have to accept these alternative forms of ID and homeless people often struggle to open a bank account. The situation is similar for newly recognised refugees. Both the Refugee Council and the All Party Parliamentary Group on Refugees have recently reported evidence of this.[48]

Solution
The Financial Conduct Authority should issue new guidance to banks regarding the documentation that banks must accept as sufficient proof to allow someone to open an account. This should include documentation that is straightforward for homeless people to get, such as a letter from a homelessness organisation they are working with. It should also include information about the documentation that newly recognised refugees will have.

Impact
Clear and robust guidance for banks should help ensure that all banks will accept alternative forms of ID. This is so that homeless people and migrants with not easily recognisable immigration documents are not discriminated against and can open a bank account.

46 Doctors of the World UK (2017) *Deterrence, delay and distress: the impact of charging in NHS hospitals on migrants in vulnerable circumstances.* https://www.doctorsoftheworld.org.uk/Handlers/Download.ashx?IDMF=2a7fc733-ceef-4417-9783-d69b016ff74f

47 Bolt, D. (2016) *An inspection of the 'hostile environment' measures relating to driving licences and bank accounts: January to July 2016*. London: Independent Chief Inspector of Borders and Immigration.

48 All Party Parliamentary Group on Refugees (2017) *Refugees Welcome? The experience of new refugees in the UK*. https://www.refugeecouncil.org.uk/assets/0004/0316/APPG_on_Refugees_-_Refugees_Welcome_report.pdf; Doyle, L. (2014) *28 days later: experiences of new refugees in the UK*. London: Refugee Council.

Responsibility for change
The Financial Conduct Authority is responsible for regulating the conduct of financial services and financial markets in the UK. Its remit includes ensuring consumers are protected from harm caused by bad conduct in the financial services industry. This can include being wrongly denied access to a basic bank account.

Improved data

An overview of available data collected by the Home Office and other statutory and voluntary services relating to EEA nationals, refugees and asylum seekers, and undocumented migrants is provided at the start of this chapter. This includes data from Crisis.

Problem
There is no comprehensive information about the number of migrants who have experienced homelessness or destitution. Although estimates have been made based on research and the limited data available, these are often incomplete or out of date.

Limited information is available about the number of homeless people who are detained in immigration detention and the number of people who are homeless when they are released.

Solution
The Home Office should collect data and make them publicly available, showing:

- the number of people who are homeless when granted refugee status
- the number of asylum seekers who have exhausted their appeal rights, but who remain in the UK without formal status or access to support
- the number of people who are homeless when entering immigration detention
- the number of people who report that they will be homeless if they are released from immigration detention.

This data should be linked in with the improved system for recording homelessness data recommended in Chapter 14 'Homelessness data'. This improved system would include comprehensive and standardised data from both statutory and non-statutory services that can track an individual's journey within the homelessness system.

Impact
Processes for collecting and publishing new data could be introduced relatively quickly without changing legislation.

Better data is needed to understand the scale of migrant homelessness and the reasons why people are becoming homeless or experiencing destitution. This would ensure that appropriate services are available to protect people from homelessness or destitution and that support is available quickly if someone becomes so. This aligns with the proposals for reformed local authority strategies set out in earlier chapters.

Responsibility for change
The Home Office will be responsible for collecting and publishing this additional data. They will need to work with other relevant departments to ensure this is linked with homelessness data.

Immigration detention

Problem
Between 2,500 and 2,900 individuals are detained in immigration detention centres in the UK on any given day, and around 30,000 people will enter immigration detention annually.
The largest group of immigration detainees are people who have sought asylum at some point during their immigration process. The immigration detainee population also includes foreign national offenders and EEA nationals. Most detainees are held for fewer than two months, however a small but consistent minority are held for more than six months.[49] There is no time limit in immigration legislation for how long a person can be detained.

In 2016 just over half of people leaving detention remained in the UK.[50] At the point of release, people are at high risk of homelessness and rough sleeping, particularly as most are released on immigration bail. This means they are not entitled to homelessness assistance or welfare benefits.[51]

Data showing the number of people who are homeless when they are released from detention is not available. However, without access to benefits or knowledge of how to access asylum support many people released are likely to become homeless. Research from Amnesty International has found that release from detention is resulting in destitution and street homelessness.[52] We also have experience of individuals being released to no fixed address when the Home Office has retained their documents. This leaves them with little option but to sleep rough.

Previously immigration detainees could apply for accommodation from the Home Office if they would be homeless on release. This is now only possible in exceptional circumstances. This has resulted in people being held in detention indefinitely without justification because they will not be granted bail without accommodation. It has also meant that people are released onto the streets, where they will almost certainly be forced into destitution.[53]

Since 2015 the government has made efforts to return rough sleepers from the EEA to their home country. This includes people being supported by homelessness services and trying to find work and rebuild their lives. Very limited data is available detailing the scale or impact of this policy.

In 2016/17, 5,230 EEA nationals were removed from the country by the Home Office for not exercising or abusing their treaty rights. Of these, 276 people were returned from detention, a significant increase from 90 in 2015/16 and 27 in 2014/15.[54] We do not know how many of these people were detained and deported because they were rough sleeping.

The Home Office has confirmed that 127 EEA nationals were removed from the UK under Operation Adoze

49 Silverman, S. (2017) I*mmigration Detention in the UK, 5th revision*. Oxford: University of Oxford, The Migration Observatory.
50 Home Office detention tables, table dt_05. https://www.gov.uk/government/publications/immigration-statistics-july-to-september-2017/how-many-people-are-detained-or-returned#data-tables
51 Home Office detention tables, table dt_05. https://www.gov.uk/government/publications/immigration-statistics-july-to-september-2017/how-many-people-are-detained-or-returned#data-tables
52 Amnesty International (2017) *A matter of routine: the use of immigration detention in the UK*. London: Amnesty International.
53 Bail for Immigration Detainees (2018) *Follow up for Home Affairs Committee regarding immigration detention.* http://www.biduk.org/lists/3-policy
54 Home Office returns table volume 1, table rt_02. https://www.gov.uk/government/publications/immigration-statistics-july-to-september-2017/how-many-people-are-detained-or-returned#data-tables

between 1 November 2015 and 31 December 2015.[55] Operation Adoze was one of two government operations to remove rough sleeping EEA nationals from the UK even if they were working or had permanent residence. The BBC reported that 698 homeless EU nationals were targeted and removed from the country between May 2016 and May 2017.[56]

In December 2017, the High Court ruled that the Home Office policy designating rough sleeping as an abuse of EEA nationals' right to free movement was unlawful and discriminatory.[57] This means that EEA nationals who are rough sleeping should not be targeted by immigration enforcement teams. However, homeless migrants will continue to be at risk of detention if they have irregular status or do not have the documentation to prove their status. Because of this many are frightened of using services that can help them regularise their status and end their homelessness.[58]

Solutions
Detention centres should be required to refer people to the local housing authority if they are at risk of homelessness when they are due for release. In England, this aligns with requirements introduced by *The Homelessness Reduction Act (2017)* for public services to refer people at risk of homelessness to the local housing authority.

Emergency accommodation should be available for immigration detainees who would otherwise be homeless on release. This could be achieved by reinstating section 4(1) of *The Immigration and Asylum Act (1999)*, which allowed immigration detainees to apply for accommodation from the Home Office if they would otherwise have nowhere to live when they were released from detention.

Impact
In England, applying the duty to refer under *The Homelessness Reduction Act (2017)* to detention centres could be implemented quickly. This would mean that anyone at risk of homelessness on release would be referred to the local housing authority. They would be either supported by the authority under the prevention or relief duties, or provided with advice about appropriate support services.

Applying similar obligations in Wales and Scotland would take longer as the primary legislation is not in place to allow this. However, this could potentially be included as a condition in contracts for detention centres.

Reinstating emergency accommodation for immigration detainees may require legislation, and would therefore take longer to achieve. However, introducing an equivalent of the previous accommodation provisions should be relatively easy as the same processes could be reinstated.

55 EEA Nationals: Deportation: Written question – 55899, 1st December 2016. https://www.parliament.uk/business/publications/written-questions-answers-statements/written-question/Commons/2016-12-01/55899/
56 Ironmonger, Jon (2018) 'EU rough sleepers win damages for illegal deportations', *BBC News*, 13th May http://www.bbc.co.uk/news/uk-44093868
57 The AIRE Centre (2017) 'EEA Rough Sleeper Policy Challenge', *The AIRE Centre Press Release,* 14th December. http://www.airecentre.org/news.php/293/eea-rough-sleeper-policy-challenge-press-release
58 Malfait, R., Cottrell, S. and Fylnn, N. S. (2017) *Migrant destitution: survey and consultation, commissioned by the Strategic Alliance on Migrant Destitution*. https://www.homeless.org.uk/sites/default/files/site-attachments/SAMD%20Destitution%20Survey%20Summary%20Report%20June%202017.pdf

Responsibility for change
The Home Office is primarily responsible for these changes. There will also be a role for the Ministry of Housing, Communities and Local Government (MHCLG) in England relating to extending the duty to refer to immigration detention centres.

Voluntary reconnection

Problem
Evidence suggests that many homeless migrants will be able to regularise their immigration status in the UK when they have access to appropriate immigration advice.[59] However, in the current policy context there will always be some people who cannot regularise their status in the UK or access public funds.

This could include asylum seekers who have exhausted all rights of appeal or EEA nationals who are unable to find employment or are too ill to work. It could also affect migrants with leave to remain with a condition of no recourse to public funds. In some cases, people may decide that returning to their country of origin will be best for them. For others reconnection may not be possible or appropriate.

International reconnection involves supporting migrant homeless people to return to their country of origin. The evidence about what makes reconnections successful is explored further in Chapter 8 'Ending rough sleeping'. That chapter focuses on domestic reconnections, but the evidence is also relevant to international reconnections. The limited data available suggests that reconnection experiences and outcomes vary dramatically.

Evidence from an international evidence review of 'what works' to end rough sleeping, found that reconnections are much more likely to be successful when the person has a meaningful connection to the area. Success is also more likely when the connecting authority ensures there is meaningful support at the destination before the person travels there.[60]

Solution
Reconnections support should be available for migrants who are homeless or at risk of homelessness and who want to explore the option of returning to their country of origin. This should be provided as part of a range of options. These options should include access to immigration advice and information about the support available in the UK, ensuring people are supported to make an informed decision. Ultimately, it is an individual's decision whether they wish to pursue reconnection.

The standards that should apply to domestic reconnections are set out in Chapter 8 of this plan. Many of these standards also apply to international reconnections. This includes the requirement that reconnections are voluntary and based on an individual's choice.

A minimum level of support should also be provided by the connecting authority and be available in the recipient country. Collaboration with services in the country of origin, to which someone wishes to return, is important to help a connecting authority understand the support and accommodation options available.

Reconnections should only be supported when the connecting authority is confident this support is in place. Ongoing communication with

59 Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants*. York: Joseph Rowntree Foundation.
60 Mackie, P., Johnsen, S., and Wood, J. (2017), *Ending rough sleeping: what works? An international evidence review*. London: Crisis.

services in the country to which the person is returning will help services to establish this and ensure they understand the longer-term outcomes for reconnected people.

Reconnections services should be required to collect and publish data on the reconnections they make. This should include reasons for reconnection, the level of support in place before reconnection and long-term outcomes for individual rough sleepers wherever possible.

Impact
An international reconnections service should ensure that migrants who want or need to return to their country of origin are properly supported to do so, and can access suitable accommodation and support in the country they are returning to. This service could be commissioned and made available across the UK relatively quickly as this would not require any legislative change.

Responsibility for change
Governments in England, Scotland and Wales.

Homelessness prevention
All migrants at risk of homelessness within 56 days should be able to access statutory support to help prevent their homelessness. Chapter 6 'Preventing homelessness' sets out both the human and the financial cost of homelessness and considers the interventions needed to successfully prevent homelessness.

To ensure that homelessness is prevented for as many households as possible, we recommend that local housing authorities in all three nations have a statutory duty to prevent homelessness for all households who are at risk of becoming homeless within 56 days. This should include a mandated set of activities, such as enhanced housing advice, family mediation and tenancy sustainment support.

It is critical that this support to prevent homelessness is available to all households, regardless of their immigration status. It is particularly important that undocumented migrants and others who need to regularise their status in the UK can access prevention support.

This will require legal advice, often for a lengthy period, which is extremely difficult without access to stable accommodation. If they were able to access support to prevent their homelessness then many migrants could clarify their status in the UK or access support with a voluntary return to their country of origin.[61]

Access to legal advice and support
Access to good quality immigration advice and legal support is essential to support migrants out of homelessness, as well as to prevent homelessness and destitution occurring in the first place. The importance of providing effective and timely advice was strongly emphasised throughout the extensive consultation we carried out to inform this plan.[62]

Full-scale reform of the legal aid system is outside the scope of this report, but below are the key issues that do require attention. The Ministry of Justice should consider reforms to ensure that legal aid is available for the areas of law that will help to prevent or relieve homelessness for migrants. This includes immigration cases and early legal help for welfare benefits, debt, employment and housing advice in England and Wales.

The Legal Aid, Sentencing and Punishment of Offenders Act (2012) significantly reduced the types of cases that are eligible for legal aid in England and Wales. This means legal aid is no longer available for most non-asylum immigration cases.

Immigration law is complex and small mistakes or errors in applications lead to applications being returned or refused. Migrants may also face additional barriers, such as language barriers, not having a support network, and destitution, that make navigating this complex system more challenging. Without access to immigration advice, many migrants are left not knowing what their legal rights and entitlements are, or how to argue their cases.

The cuts to legal aid have also made it harder for people to access free legal advice, representation and other support from third sector organisations. Amnesty International has evidence to this effect. This, combined with increased demand, has made it harder for people to access the advice they need to resolve their immigration problems.[63] Consequently it is much harder for migrants to move out of homelessness. While their immigration status remains unresolved they are unlikely to be able to work or access statutory support.

The Legal Aid, Sentencing and Punishment of Offenders Act (2012) also significantly reduced the legal aid available for early legal help in welfare benefits, debt, employment and housing cases in England and Wales. Since the Act came into force, legal aid for early legal help has decreased by more than 84 per cent.[64] This makes it more difficult for people to get early advice and can result in minor problems getting worse. The risk of homelessness then increases as issues with debts, welfare benefits and rent arrears are left unresolved.

This can be particularly important for EEA nationals as the law relating to EEA nationals and benefit entitlement is complex. Incorrect decisions are unlikely to be successfully challenged without specialist advice. Losing entitlement to benefits can quickly lead to homelessness as it removes a vital safety net and is likely to leave people unable to keep up with their rent payments.

12.7 Solutions for different groups

This section details the particular difficulties of different migrant groups in avoiding or resolving homelessness. It contains recommendations for policy changes allowing each group to get the support they need.

EEA nationals
Citizens from the EEA have a right to reside in the UK for up to three months. After this they must show that they are exercising treaty rights. This could be through being a worker, a self-employed person, a self-sufficient person, a jobseeker, or a student. It could also be through being the family member of an EEA national exercising their treaty rights.

After someone has exercised their treaty rights in the UK continuously for five years they are entitled to 'permanent right of residence'. In some circumstances, EEA nationals will get permanent residence in fewer than five years. This could be, for example, if they have to stop working permanently because of a work-related accident or illness, or are retiring.

Eligibility for welfare benefits and housing for EEA nationals and their family members can be complex. It is generally related to the basis on which the person is living in the UK,

61 Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants.* York: Joseph Rowntree Foundation.
62 Hughes, N. (2018) *Have your say policy consultation: summary report.* London: Crisis.
63 Amnesty International (2016) *Cuts that hurt: the impact of legal aid cuts in England on access to justice.* London: Amnesty International.
64 The Bach Commission (2017) *The right to justice: The final report of the Bach Commission.* London: Fabian Society.

for example as a worker or a jobseeker. A number of additional restrictions to the benefit entitlements of EEA nationals were introduced in 2014. These changes limited their access to the UK labour market and to benefits[65]. A summary of the main changes is provided below.

- New arrivals to the UK must be resident for at least three months before they are eligible for income-based JSA, Child Benefit or Child Tax Credit. This also affects British citizens returning to the UK.

- After they have been resident for three months EEA nationals can claim JSA for a further three months. EEA nationals already resident in the UK also have a right to reside as a jobseeker for three months. In both scenarios, an extended period of residence as a jobseeker will only be possible if they can provide compelling evidence that they have a genuine chance of finding work.

- EEA nationals who lose their job can retain their status as a worker with associated benefit entitlements for up to six months. They can only retain their status for longer than six months if they demonstrate they have actively sought work throughout the period and have a genuine chance of finding work.

- After the limited period, EEA nationals will be subject to a Genuine Prospect of Work assessment. This determines whether they have a genuine prospect of work on the basis of evidence they provide. A limited extension to JSA may be granted if they can provide evidence of a genuine chance of gaining employment.

- For an EEA national to have a right to reside as a worker or self-employed person, the work they do has to be 'genuine and effective'.[66]

- EEA nationals who have a right to reside solely as a jobseeker will no longer be able to claim Housing Benefit. This does not affect EEA nationals who have a right to reside as a worker, and those who have retained their worker status but are no longer in work.

In June 2016, the UK made the decision to leave the EU. The decisions made as part of this ongoing process will affect the status of EEA nationals in the UK and their eligibility for welfare benefits and other support services. The government has confirmed that EU nationals who arrive in the UK before 29 March 2019 will need to apply for one of two types of status:

- settled status if they have already exercised treaty rights for five years or more

- temporary residence permit if they have exercised treaty rights for under five years.

We do not yet know in detail what the situation will be for those who arrive in the UK after 29 March 2019.

Problem

People who come to the UK to settle and work, but either lose employment or fail to find it, can be caught out by these rules and left unable to afford housing costs. This makes people homeless.

In 2014, the Social Security Advisory Committee (SSAC), an independent body that scrutinises new social security legislation, held a public consultation. It examined the potential impact of the changes to Housing Benefit entitlement for EEA nationals.

Every organisation that submitted evidence to the committee expected the removal of Housing Benefit to cause an increase in homelessness. Concerns were also raised that the changes could make it more difficult for EEA nationals to access private rented sector accommodation, even if they are in employment. This is because there is a real risk of the tenant losing income if they become unemployed.[67]

The immediate removal of Housing Benefit directly undermines someone's ability to find work again. It puts them in a position where they will be either homeless or at risk of homelessness, making it very difficult to focus on securing employment.

In England and Wales, EEA nationals with only a right to reside as a jobseeker are ineligible for statutory homelessness assistance beyond the advice and information that local authorities provide for all residents. In Scotland, all EEA nationals with a right to reside are eligible for a housing allocation and homelessness assistance from the local authority.

Restricted access to Housing Benefit means that EEA nationals with a right to reside in the UK can be entitled to homelessness assistance and temporary accommodation from their local authority, but they may have no means of paying for their accommodation. They can then accrue significant debts. This places a burden both on the person and on the local authority's homelessness budget.

The complexity of the rules governing EEA nationals' entitlement to benefits leads to individuals being wrongly denied benefits they are entitled to. It can also result in the rules being applied inconsistently across different public agencies. For example, there are a range of circumstances where an EEA national can retain their worker status after their employment ends. These are often misunderstood and lead to someone being incorrectly considered a jobseeker and losing their entitlement to Housing Benefit. The Citizens Advice Bureau has emphasised that where people are wrongly denied entitlements it is unlikely that they would be able to successfully challenge this without access to specialist advice.[68]

Solutions

- EEA nationals with jobseeker status should be entitled to claim Housing Benefit.

- All EEA nationals with a right to reside should be eligible for statutory homelessness assistance in England and Wales, as is already the case in Scotland.

- Across Great Britain, EEA nationals with a right to reside who are homeless or threatened with homelessness should have a limited entitlement to benefits for six months. This would enable them to access accommodation and take steps to end their homelessness and establish their status. They could establish their status by gaining employment or providing the necessary documentation to prove that they have permanent residence in the UK. Alternatively, they could arrange to return to their country of origin if they cannot or do not want to remain in the UK.

65 Kennedy, S. (2015) *Measures to limit migrants' access to benefits, House of Commons Library Briefing Paper 06889*. Accessed: http://researchbriefings.files.parliament.uk/documents/SN06889/SN06889.pdf

66 The UK Government introduced a minimum earnings threshold, which EEA workers must meet to be eligible for JSA, Housing Benefit, Child Benefit and Child Tax Credit. The minimum earnings threshold is set at the level at which employees must pay Class 1 National Insurance Contributions. For those who are self-employed, their average profits before tax and National Insurance deductions are made must meet the same minimum threshold.

67 Social Security Advisory Committee (2014) T*he Housing Benefit (Habitual Residence) Amendment Regulations 2014 (S.I. 2014 No. 539).* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/376102/HB-Habitual-Residence-Amendment-Regs-2014-SSAC-report.pdf

68 Sandbach, J. (2012) *Out of scope, out of mind: Who really loses from legal aid reform*. London: Citizens Advice Bureau.

- Every local authority and public agency that could assist EEA nationals should be issued with national guidance. This guidance should clarify links between the right to reside, entitlement to benefits and eligibility for homelessness assistance. It should also be tailored to each nation. Regular updates will be essential as the UK continues the process of leaving the EU, and the requirements and process for applying for the new types of status are confirmed.

- Assertive outreach should be provided for EEA nationals already rough sleeping. This is likely to require an emphasis on access to legal, benefits and employment support. This will be key to finding a long-term solution to a person's homelessness and enabling them to access and maintain stable housing. This is because their homelessness may be the result of difficulty establishing and proving their status in the UK. Reconnection support should also be available for those who are considering returning to their home country.

Assertive outreach must not be confused with enforcement. It must avoid authoritarian or coercive approaches. Importantly, outreach services should rebuild and maintain the trust of EEA nationals, which is likely to have been eroded by outreach teams working jointly with immigration enforcement.[69]

The model used by the Street Legal project could be extended or replicated for EEA nationals who are rough sleeping. Street Legal provides access to immigration advice and where possible accommodation, for homeless migrants in London who have unresolved immigration status and are from outside the EEA. The project is currently funded by the Big Lottery Foundation and delivered jointly by St Mungo's, Praxis Community Projects and Refugee Action.[70] A similar service has been piloted in Edinburgh through the StrEEt Aware project, which provided free, confidential legal advice to EEA nationals who are rough sleeping or at risk of it.[71]

Impact
Reinstating access to Housing Benefit for EEA nationals with jobseeker status is essential. It would reduce the risk of homelessness for EEA nationals who are searching for and have a good prospect of obtaining employment. It would also increase their chance of securing and maintaining employment, and reduce the risk of them becoming homeless in the future. This change could be enacted through regulations. It would have an immediate impact for homeless EEA nationals currently only eligible for JSA and who, as a result, struggle to access accommodation or employment.

Providing access to statutory homelessness assistance would ensure EEA nationals threatened with homelessness can access homelessness prevention support. Providing entitlement to benefits for a limited period allows people the time to make arrangements to support themselves and find a long-term solution to their housing issue. These changes could be made by amending regulations.

Targeted and personalised outreach for EEA nationals already sleeping rough will ensure that those who do not approach statutory homelessness services can get support to resolve their homelessness.

Responsibility for change
The DWP has responsibility for setting the eligibility criteria for welfare benefits.

The MHCLG has responsibility for determining who is eligible for statutory homelessness assistance in England and the Welsh Government has responsibility for this in Wales.

The Westminster Government has responsibility for issuing national guidance as this is likely to require input from a number of departments, including the Home Office, the DWP and the MHCLG.

The Westminster, Welsh and Scottish Governments have responsibility for addressing homelessness. So, they should take responsibility for supporting and funding an assertive outreach service to provide access to legal, benefits and employment support for EEA nationals.

Asylum seekers

Problem
Asylum seekers are particularly vulnerable to homelessness. This is because they are not generally permitted to work. Most are reliant on the financial support and accommodation provided by the Home Office while they wait for a decision on their application.

Asylum seekers can apply for financial support and accommodation under section 95 of *The Asylum and Immigration Act (1999)* if they are destitute. They can also apply for temporary support under section 98 of the Act if they need urgent support while waiting for a decision on their application for section 95 support. Administrative delays and mistakes can leave people who are entitled to support without any form of support for weeks at a time.[72]

Research from Refugee Action found that applications for temporary support (section 98) were incorrectly refused on a regular basis. Fewer than half of the applications Refugee Action assisted with were granted on initial application. But after challenging the refusal and resubmitting applications 92 per cent were granted, often with no change in the applicant's material situation.[73]

Asylum seekers also experience delays in accessing accommodation and financial support under section 95. Refugee Action found that asylum seekers had to wait on average almost two months from applying for section 95 support to being accommodated.[74] A significant proportion of decisions on applications for section 95 support are overturned on appeal. In the third quarter of 2017/18 the Asylum Support Appeals Project had appeals allowed on 69 per cent of the section 95 cases they assisted on.[75] Research from Refugee Action found that delays and incorrect decisions on applications for asylum support are causing homelessness. They highlighted examples where this led to asylum seekers being forced to sleep rough or to remain in dangerous and unsuitable accommodation.[76]

69 Taylor, D. (2017) 'Charities referring rough sleepers to immigration enforcement teams', *The Guardian*, 7th March. https://www.theguardian.com/society/2017/mar/07/charities-giving-home-office-detailsof-rough-sleepers-says-report
70 Homeless Link (2016) '*How innovative legal help is supporting destitute migrants*'. https://www.homeless.org.uk/connect/features/2016/nov/02/how-innovative-legal-help-is-supportingdestitute-migrants
71 Just right Scotland (2018) *StrEEt Aware Project*. http://justrightscotland.org.uk/our-projects/street-aware-project/
72 Basedow, J. and Doyle, L. (2016) *England's forgotten refugees: Out of the fire and into the frying pan*. London: Refugee Council.
73 Refugee Action (2017) *Slipping through the cracks: How Britain's asylum support system fails the most vulnerable*. London: Refugee Action.
74 Refugee Action (2017) *Slipping through the cracks: How Britain's asylum support system fails the most vulnerable*. London: Refugee Action.
75 Asylum Support Appeals Project (2017) *ASAP quarterly monitoring report, Q3 October – December 2017*. http://www.asaproject.org/uploads/ASAP_2017_quarterly_q3_v2.pdf
76 Refugee Action (2017) *Slipping through the cracks: How Britain's asylum support system fails the most vulnerable*. London: Refugee Action.

Solution
The government must take steps to address the high level of incorrect decisions currently being made on applications for asylum support. Errors and delays in decision making can mean people are left homeless and without support to meet their basic needs. Steps should include improving quality assurance and ensuring immigration case workers have sufficient training and capacity to make accurate and timely decisions in line with current policies and legislation.

Impact
Reducing errors and delays in decisions on asylum support applications would reduce the risk of people becoming homeless as a result of being wrongly denied support. This could be achieved relatively quickly as it does not require any legislative change.

Responsibility for change
The Home Office.

Refugees

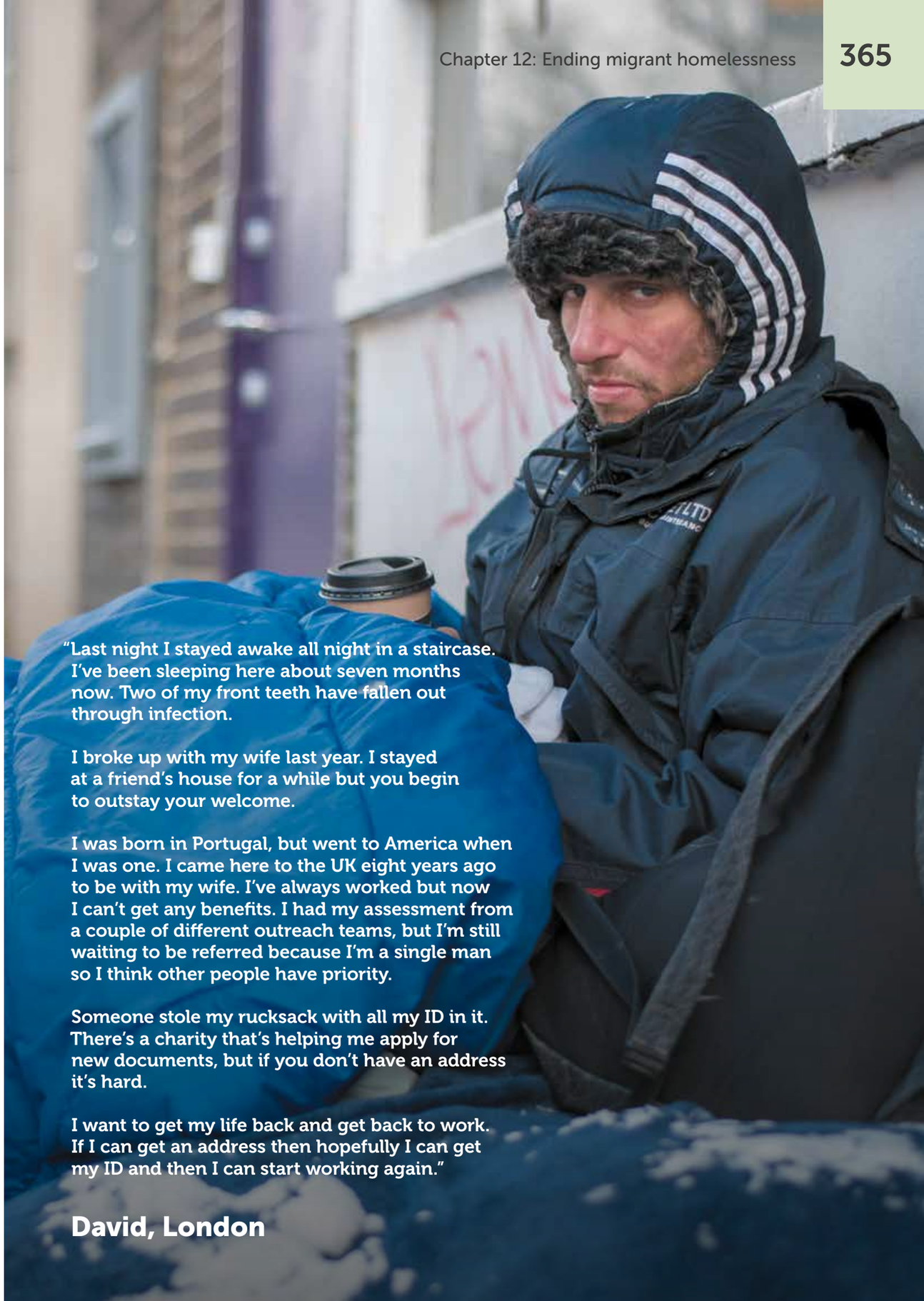
Problem
Newly recognised refugees and other beneficiaries of international protection[77] are at high risk of homelessness. When they are granted status they only have 28 days before Home Office provided asylum support is cut off. They are then forced to leave their asylum support accommodation.

This period is too short and does not give people the time they need to access financial support and housing. This is exacerbated by the delays many refugees experience in receiving the documents they need to be able to register for welfare support, open a bank account and access housing. The national roll out of Universal Credit also means that most recipients won't receive any payments for at least five weeks. Consequently, people will inevitably experience a gap in support even if they are able to make an application at the very start of the 28 day move-on period. This is in stark contrast to the support provided for refugees who come to the UK through one of the government-led resettlement schemes. They are provided with accommodation and receive support to access services and find employment.[78]

Solutions
- The 28 day move-on period should be extended to at least 56 days. This reflects the time it takes in reality for refugees to access accommodation and financial support, particularly as Universal Credit is rolled out nationally. This will help to ensure newly recognised refugees do not have a gap in their support.

  Extending the move-on period to 56 days would bring it in line with the period where households are considered threatened with homelessness under legislation in England and Wales. This would allow sufficient time for local authorities to work with a household to take steps to prevent their homelessness. Although there is no duty to prevent homelessness in Scottish homelessness legislation, extending the move-on period to 56 days allows local authorities more time to help households find stable accommodation, avoiding the need for temporary accommodation. This is unlikely to be achievable within the current 28 day move-on period. Newly recognised refugees may not be aware of the importance of approaching their local housing

77 This includes people who apply for asylum, but are granted humanitarian protection or discretionary leave to remain instead of refugee status.
78 All Party Parliamentary Group on Refugees (2017) *Refugees Welcome? The experience of new refugees in the UK*. https://www.refugeecouncil.org.uk/assets/0004/0316/APPG_on_Refugees_-_Refugees_Welcome_report.pdf



authority as soon as possible, or know how to go about doing this.

- Support should be available to help newly recognised refugees navigate the move-on period and access housing, education, employment and welfare benefits. This should include support to help with the costs of accessing private rented sector accommodation. Asylum seekers, financially supported by the Home Office, will have been unable to save for a deposit.[79]

  This could be achieved through the use of a Critical Time Intervention approach. This is a 'housing-led' approach, which provides rapid access to housing, alongside intensive case management. The case management addresses the particular needs of people once they have security of accommodation. This approach has been proven to work to prevent homelessness across a variety of groups of people leaving state institutions. The evidence is explored in more detail in Chapter 6 'Preventing homelessness'.

- Asylum support accommodation providers should be required to refer newly recognised refugees, who are at risk of homelessness, to the local housing authority when they are given notice to leave their asylum support accommodation. In England, this would align with the requirements introduced by *The Homelessness Reduction Act (2017)* for public services to refer, with consent, people at risk of homelessness to the local housing authority.

Impact
Increasing the length of the move-on period and providing a support system for newly recognised refugees should help to prevent, or at least significantly reduce the likelihood of, refugees becoming homeless immediately after they are granted refugee status.

Ensuring the providers of asylum support accommodation are subject to the duty to refer in England could be implemented quickly through reform of existing regulations. This could have a significant impact. It would mean that anyone leaving asylum accommodation who is at risk of homelessness will be referred to the local housing authority. The local authority will then have to support them under its prevention and relief duties. Applying similar obligations in Wales and Scotland will take longer.

Responsibility for change
The Home Office is responsible for asylum support. There will also be a role for the MHCLG in England relating to extending the duty to refer to providers of asylum support accommodation.

Undocumented migrants

Problem
Undocumented migrants are primarily people with an unresolved immigration status. Unresolved immigration status means: someone may have no legal right to stay in the UK, they may have a right but need to establish it, or they have a right but have lost the documents proving it. Undocumented migrants are at very high risk of homelessness as they do not have access to benefits and are not allowed to work.

Undocumented migrants sleeping rough or insecurely housed are more vulnerable to exploitation. It is not known how many undocumented migrants from outside the EEA are destitute and living in the UK. Accurate information about this group of migrants is very limited, but studies indicate that large numbers are likely to be refused asylum seekers.[80]

Access to accommodation and support to meet basic needs are critical to prevent undocumented migrants from becoming or remaining destitute. This must be provided alongside specialist legal advice to help people to resolve their immigration status. This can often be a lengthy and difficult process, and will be made even harder if a person's basic needs are not being met.

Cuts in legal funding and its scope in immigration cases mean that access to legal advice and support is very limited. Yet evidence suggests that many of the cases of undocumented migrants are resolvable. This is because they are the result of documents being lost, visas not being renewed, or bureaucratic failures that led to poor decisions being made. With legal support, people will often be able to get replacement documents or make a new application to establish their status. The Street Legal East pilot provided immigration advice for migrant rough sleepers in three East London boroughs. A total of 149 migrants were referred to the service and fewer than ten per cent of their cases were actually unsolvable. People whose cases cannot be solved have no option other than assisted voluntary return to their country of origin.[81]

Partnerships between migrant support services and homelessness agencies that use migrant organisations' expertise will be important to ensure that appropriate services are designed to end homelessness for this group. Working with community groups is also important. Undocumented migrants are a particularly difficult-to-reach group – they may be reluctant to engage with services for fear of being detained or removed. This makes it harder to ensure support is available to all those who need it.

Solutions
- Access to good immigration advice and legal aid will be critical to ending homelessness for undocumented migrants. Assertive outreach for undocumented migrants must provide both emergency accommodation and access to immigration advice.

- The government should provide short-term emergency accommodation for migrants who are homeless, or at imminent risk of becoming homeless. Access to immigration advice and legal support should be provided alongside this. This is vital in helping people to resolve their status and move into settled accommodation. This settled accommodation may be in this country or may be found through a supported return to someone's country of origin where this is the preferred or only option.

  This could be achieved by providing support for organisations and groups that already effectively help destitute migrants access accommodation, give support to meet their basic needs and provide immigration advice. Examples include the following.

  – Street Legal project – a partnership between St Mungo's, Refugee Action and Praxis Community Projects. It operates across London to provide immigration advice and,

79 All Party Parliamentary Group on Refugees (2017) *Refugees Welcome? The experience of new refugees in the UK*. https://www.refugeecouncil.org.uk/assets/0004/0316/APPG_on_Refugees_-_Refugees_Welcome_report.pdf

80 Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants*. York: Joseph Rowntree Foundation.

81 Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants*. York: Joseph Rowntree Foundation.

where possible, accommodation for homeless migrants from outside the EEA.[82]

- Accommodation leased from housing associations at a peppercorn rent to provide accommodation for destitute migrants.[83]

- Night shelters that provide emergency accommodation for homeless people regardless of their immigration status, for example Shelter from the Storm in London.[84]

- Hosting schemes, such as those provided by NACCOM members.[85]

Impact
This support is critical in preventing undocumented migrants from becoming or remaining homeless. It will help ensure people have the stable base necessary to allow them to take steps to resolve their immigration status and move on into settled accommodation.

Existing models of good practice highlighted above could be extended relatively quickly to have an immediate impact for destitute migrants.

Responsibility for change
The Westminster, Welsh and Scottish Governments are responsible for addressing homelessness. They should take responsibility for providing emergency accommodation for undocumented migrants who are homeless, or at imminent risk of becoming homeless.

Migrants with leave to remain with a condition of no recourse to public funds

Problem
Most migrants applying for leave in the UK are granted limited leave to remain subject to a condition of no recourse to public funds. They are also expected to live self-sufficiently in the UK. This leaves people vulnerable to homelessness if their circumstances change and they are no longer able to support themselves. Such vulnerability could be because of job loss, a relationship breakdown or another significant change in circumstances.

The All Party Parliamentary Group for Ending Homelessness found that local authorities are often not meeting their legal duty to support destitute families who have British children, but have no recourse to public funds.[86] The courts have ruled that it is unlawful for local authorities to separate children from their families to avoid having to accommodate the whole family. However, there are still cases where people seeking help are told that the local authority would only be able to accommodate their children.

In most cases local authorities do not have any duty to assist adults without dependent children, who have no recourse to public funds and are homeless. Local authorities may have a duty to provide care and support through social services if the person has significant needs. However, there is no duty owed to adults who do not meet this criteria.

82 Homeless Link (2016) *'How innovative legal help is supporting destitute migrants'*. https://www.homeless.org.uk/connect/features/2016/nov/02/how-innovative-legal-help-is-supportingdestitute-migrants
83 Homeless Link (2014) *Migrant Destitution Toolkit: Good practice case studies from the housing association sector.* https://www.homeless.org.uk/sites/default/files/site-attachments/SAMD%20
84 Shelter from the Storm (2018) *Homepage*. http://sfts.org.uk/
85 NACCOM (2018) *Homepage*. https://naccom.org.uk
86 APPG for Ending Homelessness (2017) *The APPG for Ending Homelessness Inquiry Session, Migrant homelessness*. https://www.crisis.org.uk/ending-homelessness/appg-forending-homelessness/

Solutions
- National governments should issue guidance for local authorities clearly setting out the duties they owe to migrant families and adults with no recourse to public funds. This should include clearly stating that local authorities' duty towards British children with migrant parents extends to the whole household. It should clarify it is not acceptable to split the family by only accommodating the children.

- National governments should provide access to immigration advice and short-term emergency accommodation for migrants with no recourse to public funds. The solutions described to meet undocumented migrants' needs must also be available to migrants who have leave to remain with a condition of no recourse to public funds.

Impact
National guidance would ensure local authorities are clear about their legal responsibilities and what they need to do to fulfil them. Guidance could be produced and issued quickly.

Responsibility for change
The MHCLG in England and the Scottish and Welsh Governments are responsible for issuing guidance to local authorities to clarify their legal duties.

The Westminster, Welsh and Scottish Governments are responsible for addressing homelessness. They should take responsibility for providing emergency accommodation for migrants with no recourse to public funds who are currently rough sleeping or are at high and imminent risk of doing so.

12.8 Conclusion

This chapter sets out a range of ways of how homelessness for migrants can be prevented, or stopped when it occurs. The complex web of rules and entitlements for different migrant groups has created myriad ways in which homelessness can occur. The recommendations for reform are focused where reliable evidence suggests they will make a positive difference.

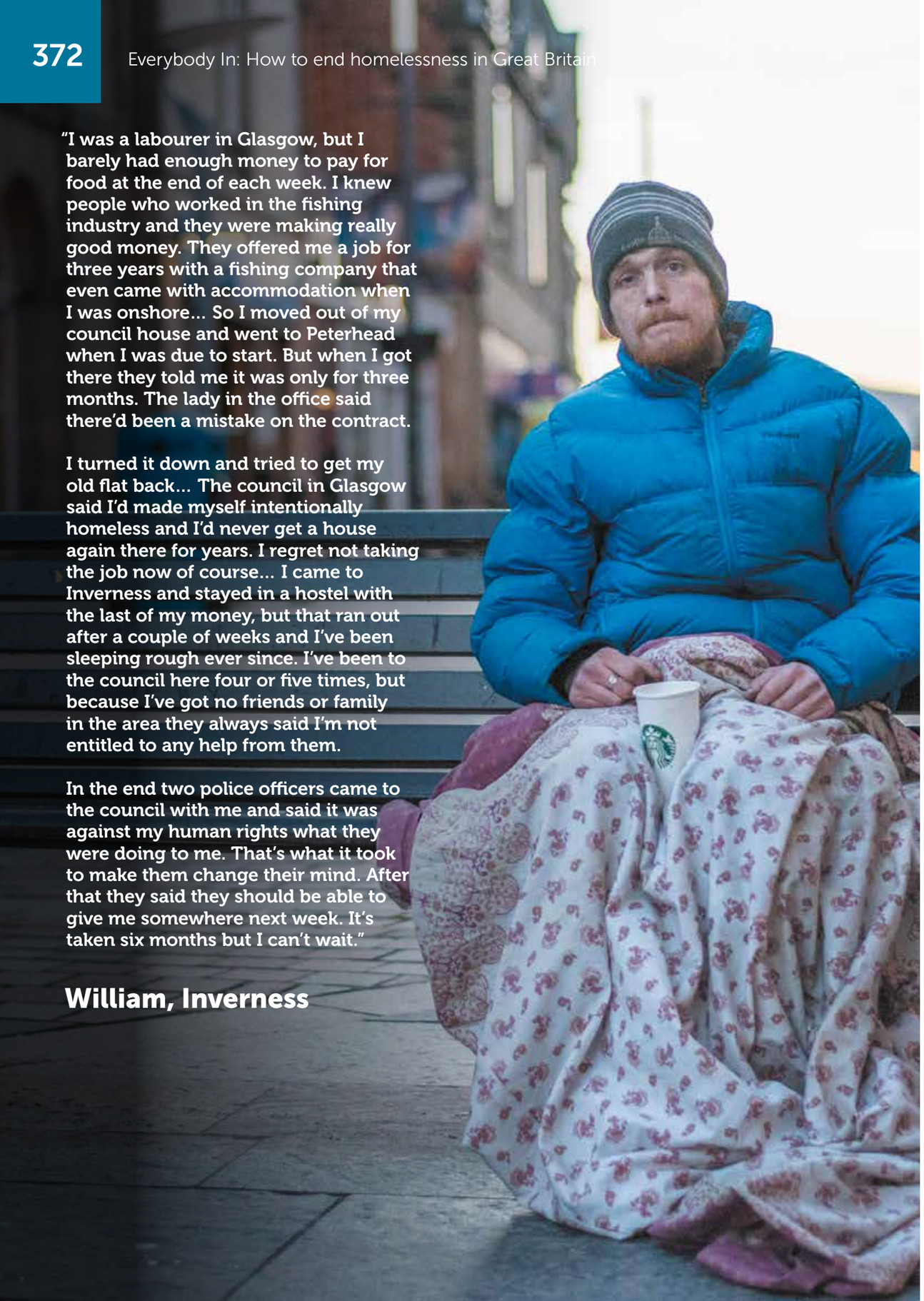
Underlying these recommendations is a proposed shift in public policy thinking towards migrant homeless people. Migrants who are homeless are vulnerable to exploitation because of being unable to access mainstream benefits and support. Some will be at particular risk because they have been a victim of modern slavery,[87] have fled exploitation or danger, or are young people.[88] In the face of such trauma and disadvantage, the current policy responses can seem callous and at times inhumane.

No strategy to end homelessness can be credible or valid without also including migrant homelessness. And no approach to ending migrant homelessness will be effective or justifiable unless the help is provided on the basis of need, and not on the basis of where someone was born.

87 Keast, M. (2017) *Understanding and responding to modern slavery within the homelessness sector.* London: The Passage.
88 Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants*. York: Joseph Rowntree Foundation.

12.9 Summary of recommendations

	England/Westminster	Scotland	Wales
For all migrants	• Reverse the right to rent policy • Reverse the extended NHS regulations that have increased the types of secondary healthcare that some migrants must pay for and introduced up-front charging • Issue new guidance to banks regarding the documentation that banks must accept as sufficient proof to allow someone to open an account • Collect and make publicly available relevant data to ensure that the impact of Home Office policies on homelessness can be measured • Make immigration detention centres subject to a statutory duty to refer people at risk of homelessness on release to the local housing authority • Ensure that immigration detainees who would otherwise be homeless on release are given access to emergency accommodation • Ensure that a properly supported voluntary reconnection service is provided for migrants who are homeless or at risk of homelessness and who want to explore the option of returning to their country of origin • Consider how best to grant access to the statutory homelessness system for all migrants • At a minimum, ensure that all migrants at risk of becoming homeless within 56 days are eligible for support under the statutory duty to prevent homelessness	• Ensure that a properly supported voluntary reconnection service is provided for migrants who are homeless or at risk of homelessness and who want to explore the option of returning to their country of origin • Consider how best to grant access to the statutory homelessness system for all migrants • Introduce a statutory duty to prevent homelessness for all households who are at risk of becoming homeless within 56 days, regardless of priority status, local connection, intentionality or migration status	• Ensure that a properly supported voluntary reconnection service is provided for migrants who are homeless or at risk of homelessness and who want to explore the option of returning to their country of origin • Consider how best to grant access to the statutory homelessness system for all migrants • At a minimum, ensure that all migrants at risk of becoming homeless within 56 days are eligible for support under the statutory duty to prevent homelessness
For EEA nationals	• Reinstate entitlement to Housing Benefit for EEA nationals with jobseeker status • Make all EEA nationals with a right to reside eligible for statutory homelessness assistance • Ensure EEA nationals who are eligible for statutory homelessness assistance have a limited entitlement to benefits for six months, including Housing Benefit • Provide national guidance for every local authority and public agency who might assist EEA nationals to make clear the link between the right to reside, entitlement to benefits and eligibility for homelessness assistance • Ensure that an assertive outreach model with an emphasis on access to legal, benefits and employment support is delivered to meet the needs of rough sleeping EEA nationals	• Support the production of national guidance for local authorities and public agencies who might assist EEA nationals by providing relevant input as required • Ensure that an assertive outreach model with an emphasis on access to legal, benefits and employment support is delivered to meet the needs of rough sleeping EEA nationals	• Make all EEA nationals with a right to reside eligible for statutory homelessness assistance • Support the production of national guidance for local authorities and public agencies who might assist EEA nationals by providing relevant input as required • Ensure that an assertive outreach model with an emphasis on access to legal, benefits and employment support is delivered to meet the needs of rough sleeping EEA nationals
For asylum seekers and refugees	• Address the high level of incorrect decisions currently being made on applications for asylum support • Extend the move-on period for newly recognised refugees to at least 56 days • Ensure support is available to help newly recognised refugees navigate the move-on period and access housing, education, employment and welfare benefits • Make the providers of asylum support accommodation subject to a statutory duty to refer people leaving asylum support accommodation who are at risk of homelessness to the local housing authority		
For undocumented migrants and migrants with no recourse to public funds	• Ensure that short-term emergency accommodation and access to immigration advice is provided for migrants who are homeless, or at imminent risk of becoming homeless • Issue guidance for local authorities clearly setting out the duties they owe to migrant households with no recourse to public funds	• Ensure that short-term emergency accommodation and access to immigration advice is provided for migrants who are homeless, or at imminent risk of becoming homeless • Issue guidance for local authorities clearly setting out the duties they owe to migrant households with no recourse to public funds	• Ensure that short-term emergency accommodation and access to immigration advice is provided for migrants who are homeless, or at imminent risk of becoming homeless • Issue guidance for local authorities clearly setting out the duties they owe to migrant households with no recourse to public funds



"I was a labourer in Glasgow, but I barely had enough money to pay for food at the end of each week. I knew people who worked in the fishing industry and they were making really good money. They offered me a job for three years with a fishing company that even came with accommodation when I was onshore... So I moved out of my council house and went to Peterhead when I was due to start. But when I got there they told me it was only for three months. The lady in the office said there'd been a mistake on the contract.

I turned it down and tried to get my old flat back... The council in Glasgow said I'd made myself intentionally homeless and I'd never get a house again there for years. I regret not taking the job now of course... I came to Inverness and stayed in a hostel with the last of my money, but that ran out after a couple of weeks and I've been sleeping rough ever since. I've been to the council here four or five times, but because I've got no friends or family in the area they always said I'm not entitled to any help from them.

In the end two police officers came to the council with me and said it was against my human rights what they were doing to me. That's what it took to make them change their mind. After that they said they should be able to give me somewhere next week. It's taken six months but I can't wait."

William, Inverness

Chapter 13:

Homelessness legislation

Great Britain has some of the most effective and forward-thinking homelessness legislation in the world. It protects hundreds of thousands of people annually.

But despite this success, there are still winners and losers from the statutory systems in England, Scotland and Wales. The time is right to complete a strong safety net of legal protection for all homeless people.

13.1 Introduction

In this chapter we propose the 'ideal' statutory homelessness systems for England, Scotland and Wales. Our proposals draw on learning and evidence from across Great Britain and internationally. We present the rationale for a strong and complete safety net of legal protections and entitlements for homeless people.

To gather an assessment of the ideal legal framework, we commissioned an analysis and proposal for wholesale reform from the two leading experts in academia and housing law. They are Professor Suzanne Fitzpatrick from Heriot-Watt University, and barrister Liz Davies from Garden Court Chambers.[1]

Their full proposal and paper will be published separately.[2] It provides additional context and arguments to that contained in this chapter. Unless

1 Liz Davies is a barrister at Garden Court Chambers specialising in housing and homelessness law. She is co-author of *Housing Allocation & Homelessness: Law and Practice* (Luba, Davies, Johnston and Buchanan, LexisNexis 5th edition, forthcoming). Suzanne Fitzpatrick is Professor of Housing and Social Policy at Heriot-Watt University, and Director of the University's Institute of Social Policy, Housing and Equalities Research (I-SPHERE).

2 Davies, L., Fitzpatrick, S. (forthcoming) *A 'Perfect' Statutory Homelessness System for an Imperfect World: Principles, Priorities, Proposals and Possibilities*.

otherwise stated, all analysis and references in this chapter relate to the Davies and Fitzpatrick paper. The table of summary recommendations for national governments at the end of this chapter reflect agreed principles, but are entirely written by Crisis.

13.2 The arguments for and against rights-based systems on homelessness

Before considering the ideal statutory homelessness system we should ask, why have statutory homelessness rights at all? No other country in the world has anything equivalent and some other countries, especially in Europe, seem to have low levels of homelessness.[3] There is a right to emergency shelter in narrowly defined circumstances in a few European states, including Germany and Sweden, and in a single jurisdiction in the US (New York City). However, enforceable rights to permanent or settled housing for homeless people are limited to the UK.[4]

In some countries, including Ireland, enforceable rights for homeless people have been explicitly rejected as 'adversarial'. They have been seen as counter-productive in the difficult task of rationing scarce housing resources.[5]

Some people argue that enforceable legal rights can contribute to social policy becoming over legalised, frustrating its fundamental purpose and encouraging a defensive, process orientated mindset in housing practitioners. They argue that this mindset can then result in practitioners becoming more concerned about protecting themselves from legal challenge than addressing the needs of homeless people and other service users.[6] Others argue that enforceable legal rights direct power and resources into the hands of the legal profession and away from service provision.[7]

Against this, international comparative research suggests that some enforceable statutory rights have formidable advantages. This includes countering the tendency for social landlords to exclude low-income and vulnerable households from their properties when such rights are absent.[8] Such rights can create a better balance of power, giving homeless people an enforceable right of action against those charged with assisting them, should they fail in their responsibilities.[9] Receiving assistance as a matter of right, rather than as a matter of discretion, may help to safeguard the self-respect of those who may otherwise be made to feel (deliberately or otherwise) like humiliated supplicants.[10]

Ken Loach's 1966 film *Cathy Come Home* shockingly portrayed what happens when homeless people are not entitled to statutory rights and are dependent on discretionary powers exercised by local authorities. It showed a system infused by decision-making based on moralising value judgments. The system broke up the whole family – initially separating Cathy and her children from her husband Reg – and finally the children from Cathy as they were taken into care.

The film helped to foster the environment that led eventually to the passage of *The Housing (Homeless Persons) Act (1977)*. This Act set up the statutory duties on local housing authorities to provide accommodation and assistance to homeless people. We focus on these duties in the remainder of this chapter.

13.3 Presenting the fundamentals of Great Britain's statutory homelessness system

The Housing (Homeless Persons) Act (1977) was a major step forward in legally protecting homeless people. It set out how local authorities must make accommodation available to certain categories of homeless people; mainly families with children and vulnerable adults. The long-term accommodation provided under this legislation was usually council housing.

The legislation also strongly reinforced an ongoing shift from council house allocations based on desert (judged by various moral criteria) to ones based more clearly on housing need.[11]

The 1977 Act covered all of Great Britain, and was extended to Northern Ireland in 1988. This Act was consolidated into separate legislation in England and Wales on the one hand, and Scotland on the other. The basic statutory homelessness framework remained very similar throughout the UK until the 1990s. But there is now a significant differentiation in homelessness law in each jurisdiction, as is discussed in the next section.

Strictly speaking, the 1977 Act did not create *rights* – rather it imposed *duties* on local housing authorities once certain conditions were triggered. However, critically these duties were precise enough to allow legal recourse to people whom local authorities fail in their duty. Any failure to comply with the duty could be enforced by the applicant through the courts. Individually enforceable rights are far more practically useful than constitutional or other abstract rights to housing which are common in continental Europe and elsewhere.[12]

As described above, the 1977 Act is internationally unique, and some of its features are particularly important. First, the definition of homelessness it employed was exceptionally wide. You are deemed legally homeless if you have no accommodation in

3 Fitzpatrick, S., Bengtsson, B., and Watts, B. (2014) 'Rights to Housing: Reviewing the Terrain and Exploring a Way Forward.' *Housing, Theory and Society*. 31(4), 447-463.; Benjaminsen, L. and Bastholm Andrade, S. (2015): 'Testing a typology of homelessness across welfare regimes: shelter use in Denmark and the USA', *Housing Studies*, 30(6): 858-876.; Toro, P.A., Tompsett, C.J., Philippot, P., Nachtergael, H., Galand, B., Schlienz, N., Stammel, N., Yabar, Y., Blume, M., MacKay, L. & Harbey, K. (2007) 'Homelessness in Europe and the United States: a comparison of prevalence and public opinion', *Journal of Social Issues*. 63(3): 505-524.

4 With France a very partial exception, see Lévy-Vroelant, Claire. 'The Right to Housing in France: Still a Long Way to Go from Intention to Implementation.' *Journal of Law and Social Policy*. 24. (2015): 88-108.

5 O'Sullivan, E. (2008) 'Sustainable solutions to homelessness: The Irish case', *European Journal of Homelessness*. 2: 205–233.

6 Dean, H. (2002) *Welfare Rights and Social Policy*. Harlow: Pearson Education Limited.

7 De Wispelaere, J., and J. Walsh. (2007) 'Disability Rights in Ireland: Chronicle of a Missed Opportunity.' Irish Political Studies 22 (4): 517–543.

8 Fitzpatrick, S. and Stephens, M. (2007) A*n International Review of Homelessness and Social Housing Policy*. London: Department of Communities and Local Government.; Pleace, N., Teller, N. & Quilgars, D. (2012) *Social Housing Allocation and Homelessness: EOH Comparative Studies on Homelessness 1*. Brussels: FEANTSA.

9 Kenna, P. (2005) *Housing Rights and Human Rights*. Brussels: FEANTSA.

10 Le Grand, J. (1997) Knights, Knaves or Pawns? Human behaviour and Social Policy. *Journal of Social Policy*, 26(2), 149-169.; Lister, R. (2004) *Poverty*. Cambridge: Polity Press. But for a counter view see Bengtsson, B. (2001) 'Housing as a social right: implications for welfare state theory', *Scandinavian Political Studies*. 24(4): 255–275.

11 Fitzpatrick, S., and Stephens, M. (1999) 'Homelessness, need and desert in the allocation of council housing', *Housing Studies*. 14(4), 413-431.

12 Fitzpatrick, S., Bengtsson, B., and Watts, B. (2014) Rights to Housing: Reviewing the Terrain and Exploring a Way Forward. *Housing, Theory and Society*. 31(4), 447-463.

which it is 'reasonable' to expect you to live together with your family.[13] In many other countries, notably the US, a much more literal definition of homelessness is used – focused only on those sleeping on the streets or in night shelters.

Second, local authority obligations are not limited to those 'homeless today' but also include people likely to become homeless in the near future. Historically this is 28 days, although it has now been extended to 56 days in more recent legislation.[14] Consequently, many of those accepted by local authorities under the homelessness legislation have never actually been without any form of accommodation. Only a very small minority have slept rough.

However, there were also significant limitations to the scope of the 1977 Act. Most importantly, only those homeless households in priority need were legally entitled to rehousing. This meant mainly families with children, with single people included only where they met vulnerability tests, which could be tightly applied.[15]

Other limitations included the requirement that even these priority need groups be blameless for their predicament. Those found intentionally homeless were entitled to temporary rather than settled accommodation. Local authorities could transfer the rehousing duty to other local authorities on local connection grounds. People ineligible for assistance due to their immigration status were also not entitled to any help under the homelessness legislation anywhere in Great Britain,[16] even if they have a priority need. There have been some changes to this in recent years for migrant homeless people from Europe.[17]

Once the local authority has determined whether it owes a duty to secure accommodation, how it performs that duty is largely a matter for them. This is provided that (as a bottom line) the accommodation secured is suitable for the applicant.[18] Case law has established that the accommodation must be suitable for the specific needs of that individual applicant, and of his or her household.[19] Accommodation must also be affordable for an applicant,[20] and the location, physical features, and other elements of the accommodation are also relevant.[21]

If at the end of this process an applicant is not accommodated under homelessness duties,[22] and has children, or a need for care, and cannot find their own accommodation, they can ask children's or adult social services to assess the needs of the children or of the person needing care. This includes any need for accommodation, and to provide services to meet any assessed need.[23]

Those assessments can contain value judgements about an adult's past behaviour, reasons for homelessness etc. It is rare, but not necessarily unlawful, for children's services to conclude that accommodation will be offered to a child and not to their parent(s), splitting families apart in the process.[24]

This system, whereby social services assess needs and decide how to provide any services, is the modern equivalent of the help that Cathy (in *Cathy Come Home*) received from social services in 1966. This help involved discretionary judgments, rather than enforceable duties.

There are many further questions that arise during the process of an application for homelessness assistance. It is for a local housing authority to determine factual questions (eg 'are you homeless?'), but it is also for a local authority to make a judgment of certain conditions. One key judgment is whether or not someone is 'vulnerable'.[25] In England and Wales, this is a crucial test determining whether a person is in priority need and thereby owed the main rehousing duty.

These evaluative or discretionary judgments can result in conclusions that an applicant regards as wrong, or have harsh consequences for them. This could be when someone is not considered vulnerable, or when an applicant is offered accommodation in another town or city and told that location is considered suitable for them.

When these judgements are contested by the applicant, the opportunity for an internal review of those decisions, as is provided in all three nations, is helpful. It provides a second eye and an opportunity to make representations, and the review is not limited to issues of law. A reviewing officer at a local authority can come to a different decision to the first decision-maker on the same set of facts.

However, the reviews process is not independent. It is undertaken either by a senior employee of the same local authority or by a contractor to the authority. The only redress for an applicant from an adverse review decision is to appeal to the County Court on a point of law[26] in England and Wales.

In both jurisdictions and in Scotland, there is also the possibility of seeking a judicial review of the lawfulness of local authorities' decision-making. This may then be overturned on grounds such as 'manifest unreasonableness' or

13 In 1985, the House of Lords held that *The Housing (Homeless Persons) Act (1977)* as originally drafted did not include the concept of 'reasonable to continue to occupy' within the definition of homelessness: *R v Hillingdon LBC ex parte Puhlhofer* [1986] AC 484, HL. As a result, Parliament amended the legislation then in force to insert into the definition of 'homelessness' that a person is homeless if he or she has accommodation which it is not reasonable to continue to occupy: Housing Act 1985, s 58(2A), inserted by Housing and Planning Act 1986, s 14(2).

14 From April 2002 in Scotland: s 24(4) *Housing (Scotland) Act (1987)* amended by the *Housing (Scotland) Act (2001);* from April 2015 in Wales: s 55(4) *Housing (Wales) Act (2014);* from April 2018 in England: the *Housing Act (1996),* s 175(4) amended by the *Homelessness Reduction Act (2017).*

15 MacKie, P. and Thomas, I. (2014) *Nations Apart? Experiences of Single Homeless People Across Great Britain*. London: Crisis.

16 Housing Act (1996), s. 185 (England); Housing (Wales) Act (2014); s 61 (Wales); Immigration and Asylum Act 1999 s 119 (Scotland).

17 Eligibility requirements are primarily consistent across all three nations with the exception of eligibility for EEA nationals. In Scotland all EEA nationals with a right to reside in the UK are eligible for statutory homelessness assistance. In England and Wales, EEA nationals who only have a right to reside as a jobseeker are ineligible for statutory homelessness assistance beyond the advice and information that local authorities provide all residents.

18 Housing Act (1996), s 206(1); Housing (Wales) Act (2014), ss 68 and 75; Housing (Scotland) Act (1987), s 35.

19 *R v Brent London Borough Council ex parte Omar* (1991) 23 HLR 446, QBD.

20 Housing Act (1996), s 210 & Homelessness (Suitability of Accommodation) Order 1996, SI 1996/3204; Housing (Wales) Act (2014), s 59(2).

21 Housing Act (1996), s 210 and Homelessness (Suitability of Accommodation) (England) Order 2012, SI 2012/2601; Housing (Wales) Act (2014), s59(1) and Homelessness (Suitability of Accommodation) (Wales) Order 2015, SI 2015/1268 (W. 87).

22 Because the applicant is not eligible for assistance, or has been found to have become homeless intentionally, or has refused an offer of suitable accommodation.

23 Children Act (1989), s17, Care Act (2014), s 18; Social Services and Well-being (Wales) Act (2014), ss 35 and 37; Children (Scotland) Act (1995), s 22, and Social Work (Scotland) Act (1968), s 12.

24 R (G) v Barnet LBC [2003] UKHL 57, [2004] 2 AC 208, HL. This happened in *Nzolameso v City of Westminster Council* [2015] UKSC 22, [2015] HLR 22, HL

25 HA 1996, s 189(1)(c), Hotak v Southwark LBC [2015] UKSC 30, [2015] 2 WLR 1341, HL

26 HA 1996, s 204; H(W)A 2014, s 89.

"I was self-employed for many years in plastering. In 2007 I decided to open up a shop...

I signed up for a three-year lease. But after about ten months the credit crunch began. In 2009 I had to declare myself bankrupt.

I was living with my partner at the time, but sadly that relationship ended. The only thing I had was my van. I lived in the van for about six months.

I registered as homeless with four councils in the Liverpool area. All in places that I had connections with, but there was only one council that would support me. All the others said that as a single homeless person I couldn't be helped. I couldn't believe that I was in my own country and I couldn't get anywhere to live.

Eventually the council paid for me to stay in a bed and breakfast out in the countryside and the owner was actually a millionaire builder and I ended up working for him.

Through plastering I had managed to save enough money to do a teaching qualification at the National Construction College.

I became a construction tutor for a charity supporting homeless people, where I work now.

One thing I've learned from working with homeless people is that they're very adaptable and resourceful.

People are on the streets for all sorts of reasons. A lot of homeless people can't get benefits simply because they don't have an address. They're in a situation that's often not of their own doing."

Andy, Liverpool

taking into account 'irrelevant factors'. These are useful tools in administrative law, in that it regulates good decision-making. However, they do not provide immediate redress for a dissatisfied applicant.

A further weakness of *The Housing (Homeless Persons) Act (1977)* is that it is only focused on resolving housing needs, and not any wider support needs that homeless households may have. The Act is very much crisis focused. It targets situations where homelessness has already occurred or is imminent – rather than facilitating more upstream forms of prevention with groups known to be at high risk. This is linked to the fact that, while there were very general duties across Great Britain for other public bodies and social landlords to provide 'reasonable assistance' to local authorities in the discharge of their homelessness duties, these were so vague as to be unenforceable.

Difficulties faced by local housing authorities in securing necessary assistance from social services, health and criminal justice services in delivering their homelessness duties is a recurring theme across Great Britain.[27] Likewise, there have been longstanding tensions over nominations of homeless and other prospective tenants by local authorities to housing associations. These occur where the prospective tenant has qualified under the local authority's allocation scheme, but is ineligible under the housing association's scheme.[28]

13.4 Understanding differences in the statutory homelessness systems across Great Britain

All three British jurisdictions have developed their homelessness systems in different ways since the 1990s, and each has strengths and weaknesses. None are ideal, but there are lessons to be drawn from each in determining the ideal statutory system.

Chapter 2, 'Public policy and homelessness', details the political process and rationale for the major legal changes in England, Scotland and Wales. The detail and consequences of those changes are summarised below.

Scotland

The first specifically Scottish piece of legislation governing homelessness was *The Housing (Scotland) Act (1987), Part 2*. This remains in force and contains the legal framework for homelessness duties and powers on Scottish local authorities. However, Scotland's legal and policy framework radically diverged from the rest of the UK early in the post-devolution period.[29] This process began with *The Housing (Scotland) Act (2001)*, which introduced new duties on local authorities to provide temporary accommodation for non-priority homeless households.

27 See Crisis and JRF Homelessness Monitor Series https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/homelessness-monitor/

28 Complaints by applicants who are caught by this tension are usually taken to the relevant Ombudsman rather than determined by the Courts. For two examples, see Complaint against Kettering Borough Council (Local Government Ombudsman 11 011 766, 16 January 2013) where the applicant was a home owner who had been accepted under the local housing authority's allocation scheme but not by the housing association whose property he had bid for under the allocation scheme; and Complaint against Tai Ceredigion Cyf (Public Services Ombudsman for Wales 2012 04677) where the applicant had owed rent arrears to her former landlord.

29 Fitzpatrick, S. (2004) 'Homelessness policy in Scotland', in Sim, D. (ed.) *Housing and Public Policy in Scotland*. Coventry: CIH; Pawson, H. and Davidson, E. (2008) 'Radically divergent? Homelessness policy and practice in post-devolution Scotland', *European Journal of Housing Policy*, 8(1): 39-60.

This was a crucial step because it established the principle that non-priority households should be entitled to material assistance from local authorities. *The Housing (Scotland) Act (2001)* also imposed obligations on housing associations to give 'reasonable preference' to all homeless households in their allocations policies.[30]

More radical reforms were introduced in *The Homelessness Etc. (Scotland) Act (2003)* with the gradual expansion and eventual abolition of priority need by the end of December 2012.[31] This Act also allowed for the softening of the intentionality test. This gave local authorities discretion to investigate whether a household had brought about their own homelessness. It also ensured that some form of accommodation and housing support was available to those found to be intentionally homeless.[32] *The Housing (Scotland) Act (2001)* also gave the Scottish Government the power to suspend the operation of local connection rules.[33] To date neither of these amendments has been brought into force.[34]

A duty to assess the housing support needs of homeless households, and to ensure that housing support needs are met, was introduced by *The Housing (Scotland) Act (2010)*.[35] The relevant provisions began in June 2013.[36]

The clear strength of the Scottish system is that there is an (almost) universal statutory safety net. This removes the traditional discrimination against single people within the statutory homelessness system.[37] This has undoubtedly led to much better treatment of this group by local authority homelessness services.[38] It is also likely to be related to overall reductions in rough sleeping since *The Homelessness Etc. (Scotland) Act (2003)* came into force.

However, across the country growing demand for homelessness assistance, coupled with a reduction in the available social housing, has presented challenges in delivering this universal rights model. The number of households living in temporary accommodation almost trebled in Scotland between 2001 and 2011 and, after a small decline, is now close to record levels.[39]

From 2010 onwards, the Scottish Government promoted prevention measures along the lines of the English Housing Options approach. A sharp drop in homelessness applications and acceptances followed, and as in England, this prompted concerns about applicants being diverted from or denied assistance (often referred to as gatekeeping) in certain local authority areas.[40]

In 2014, the Scottish Housing Regulator published a thematic inquiry, which endorsed the principles of Housing Options, but also echoed concerns, expressed by other commentators, about the diversion of people from statutory homelessness.[41]

Wales

Following the devolution of the right to pass primary legislation in the areas of housing and homelessness,[42] a radically new approach was contained in *The Housing (Wales) Act (2014)*. This Act came into force in April 2015. It strongly emphasised earlier intervention and assistance tailored towards the specific needs of households threatened with homelessness within 56 days. This preventative assistance is available to all eligible households who are homeless or threatened with homelessness, regardless of whether or not they have a priority need.[43]

The aim is to help people remain in their own homes (by trying to solve the problem that resulted in the threat of them having to leave) or to find alternative accommodation quickly. This is so that they do not experience the crisis of actual homelessness.

For those who are already homeless when they approach the local authority, or whose homelessness cannot be prevented, local authorities have to take reasonable steps to relieve their homelessness. The interventions that local authorities ought to have available are set out in an accompanying code of guidance.[44]

The priority need test remains relevant in three aspects.

- If a local authority has reason to believe that a homeless person may have a priority need, it must provide temporary accommodation while trying to help the person find his or her own accommodation.[45]
- A local connection referral of the relief duty can only be made if the applicant has a priority need and has not become homeless intentionally.[46]
- If the relief efforts to find alternative accommodation do not succeed, a person with a priority need will be entitled to have housing secured by the local housing authority. A person with no priority need will not.[47] Crucially, though, applicants who 'unreasonably fail to cooperate' with the prevention or relief assistance, or refuse a suitable offer of accommodation, may not progress to this final statutory duty.[48]

30 Though note that various issues have been identified with the operation of these Section 5 referrals in practice, see Britain, A., Robertson, L., Tate, J. and Craigforth, S.L. (2009) *Review of Section 5 of the Housing (Scotland) Act (2001)*. Edinburgh: Scottish Government.
31 Homelessness etc (Scotland) Act 2003, s 2, and Homelessness (Abolition of Priority Need Test) (Scotland) Order 2012, SI 2012/330 (Scottish SI).
32 Homelessness Etc. (Scotland) Act (2003), s 4, s 5, s 6
33 Homelessness Etc. (Scotland) Act (2003), s 8
34 Though note that just recently the Scottish Government has accepted Homelessness and Rough Sleeping Action Group (HARSAG) recommendations that these uncommnenced sections on both intentionality and local connection are brought into force.
35 The duty is contained in Section 32B of the Housing (Scotland) Act 1987, as amended
36 Shelter Scotland (2014) *Supporting Homeless People: Have New Legal Duties Made a Difference?* Edinburgh: Shelter Scotland.
37 Anderson, I. (2009) 'Homelessness policy in Scotland: A complete state safety net by 2012?', in Fitzpatrick, S., Quilgars D. and Pleace, N. (eds.) *Homelessness in the UK: Problems and Solutions*. Coventry: CIH.
38 MacKie, P. and Thomas, I. (2014) *Nations Apart? Experiences of Single Homeless People Across Great Britain*. London: Crisis.
39 Stephens, M., Wilcox, S., Perry, J., Williams, P. and Young, G. (2018) UK Housing Review. Coventry: CIH. (Table 91c)
40 Fitzpatrick, S., Pawson, H., Bramley, G. and Wilcox, S. (2012) *The Homelessness Monitor: Scotland 2012*. London: Crisis
41 Scottish Housing Regulator (2014) Housing Options in Scotland: A Thematic Inquiry. https://www.scottishhousingregulator.gov.uk/publications/housing-options-scotland-thematic-inquiry.
42 Government of Wales Act (2006), s 108 and Sch 7, para 11, amended by National Assembly for Wales (Legislative Competence) (Amendment of Schedule 7 to the Government of Wales Act (2006) Order 2007, SI 2007/2143.
43 Housing (Wales) Act (2014), s 66 and Code of Guidance for Local Authorities on the Allocation of Accommodation and Homelessness (Welsh Government, March 2016) (Welsh Code), Chapter 12.
44 Housing (Wales) Act (2014), s 73 and Welsh Code, Chapter 13.
45 Housing (Wales) Act (2014), s 68.
46 Housing (Wales) Act (2014), s 80(1). Applicants who are entitled to the relief duty because they are homeless and eligible for help, but do not have a priority need, cannot be referred under local connection.
47 Housing (Wales) Act (2014), s 75.
48 Housing (Wales) Act (2014), ss 74(5), 75(1) and 79(5).

Nearly three years after implementation of this new approach, there is consensus among commentators and housing practitioners that *The Housing (Wales) Act (2014)* has had highly beneficial impacts.[49] Service users have also given generally positive feedback.[50] It has begun the process of re-orientating the culture of local authorities towards a more preventative, person-centred and outcome-focussed approach.

The Housing (Wales) Act (2014) has brought about a much better service response to single homeless people in particular. Although variations in service outcomes remain across Wales, and successful outcomes for single people still tend to be poorer than for families with children.[51] In 2016/17, two thirds (62%) of 'prevention' and 41 per cent of relief interventions were successful. There has been a subsequent massive reduction in the number of households owed the final duty to secure accommodation.[52]

The success of the prevention and relief models means that the becoming homeless intentionally test has become of far less significance than was previously the case. This is because it is only applied to an applicant who has a priority need,[53] and where relief efforts to help them find their own accommodation have been unsuccessful.

Until 2019, local authorities can choose whether to apply the intentionality test,[54] and, if so, to apply it to all priority need groups or only to some of those groups.[55]

However, even under this more inclusive statutory model in Wales, there is a substantial group of homeless people for whom the system will not resolve their homelessness. This group includes:

- households unsuccessfully helped through relief duties to find alternative accommodation and who are then deemed not to have a priority need, and so do not qualify for the main housing duty (mainly single people)
- cases which fall out of the system specifically due to non cooperation
- rough sleepers – there has been an undisputed recent rise in rough sleeping in Wales, though its precise scale is difficult to judge.[56]

Proposals for a (priority need blind) duty to provide somewhere safe to stay for all applicants, particularly those at risk of sleeping rough, were abandoned during the passage of the 2014 reforms. This followed opposition from the Welsh Local Government Association (WLGA).[57]

In April 2018, the Equalities, Local Government and Communities Committee of the National Assembly of Wales recommended abolition of the priority need test.[58]

England

The approach applied in Wales since April 2015 was broadly introduced in England on 3 April 2018, when amendments inserted into *The Housing Act (1996)* by *The Homelessness Reduction Act (2017)* came into force.

The amendments inserted by *The Homelessness Reduction Act (2017)* mirror the Welsh approach in the following ways.

- There is an emphasis on early intervention, with the definition of 'threatened with homelessness' expanded[59]
- The new prevention[60] and relief[61] duties apply to all applicants who are eligible for assistance and are either threatened with homelessness, or are homeless; there is no consideration at those stages of whether the applicants have a priority need or have become homeless intentionally
- Interim accommodation must be secured for applicants where there is reason to believe that they may have a priority need[62]
- Duties to accommodate after the relief duty has come to an end are only owed to applicants who are homeless, eligible for assistance and have a priority need.[63]

There is also a duty to carry out an assessment of the applicant's case and, following that assessment, to draw up a personalised housing plan that should be agreed with the applicant. That plan contains the steps that the local housing authority will take to help the applicant keep, or find,

49 Mackie, P., Thomas, I. and Bibbings, J. (2017) 'Homelessness prevention: reflecting on a year of pioneering Welsh legislation in practice, *European Journal of Homelessness*. 11(1): 81-107.; Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood J. (2017) *The Homelessness Monitor: Wales 2017*. Crisis.; Ahmed, A., Wilding, M., Gibbons, A. Jones, K. Rogers, M. Madoc-Jones, I. (2017) *Post-implementation evaluation of Part 2 of the Housing Act (Wales) (2014) Interim Report*. Cardiff: Welsh Government.

50 Mackie, P., Thomas, I. and Bibbings, J. (2017) 'Homelessness prevention: reflecting on a year of pioneering Welsh legislation in practice, *European Journal of Homelessness*, 11(1): 81-107.; Ahmed, A., Wilding, M., Gibbons, A., Jones, K., Rogers, M. and Madoc-Jones, I. (2017) *Post-implementation evaluation of Part 2 of theHousing Act (Wales) (2014) Interim Report*. Cardiff: Welsh Government.

51 Mackie, P., Thomas, I. and Bibbings, J. (2017) 'Homelessness prevention: reflecting on a year of pioneering Welsh legislation in practice, *European Journal of Homelessness*,' 11(1): 81-107.

52 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood J. (2017) *The Homelessness Monitor: Wales 2017*. London: Crisis.

53 Local authorities are also able now to decide whether to 'opt in' to applying the test to none, some or all of the priority need groups.

54 Housing (Wales) Act (2014), s 78 and Homelessness (Intentionality) (Specified Categories) (Wales) Regulations 2015, SI 2015/1265 (W. 85).

55 An example of a council choosing not to apply the becoming homeless intentionally universally is Cardiff City Council, which decided not to apply it to 16 and 17 year olds: https://www.cardiff.gov.uk/ENG/resident/Housing/Homeless-or-at-risk/At-risk-of-being-homeless/Pages/At-risk-of-being-homeless.aspx.

56 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B.and Wood, J. (2017) *The Homelessness Monitor: Wales 2017*. London: Crisis.

57 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Wales 2015*. London: Crisis.

58 *Life on the Streets: preventing and tackling rough sleeping in Wales* (Equalities, Local Government and Communities Committee, National Assembly for Wales, April 2018).

59 Housing Act (1996), s 175(4) and (5): increasing the period from 28 days to 56 days, and providing that an applicant is deemed to be threatened with homelessness if he or she has been served with a valid Housing Act (1988), s 21 notice.

60 Housing Act (1996), s 195(2).

61 Housing Act (1996), s 189B(2).

62 Housing Act (1996), s 188.

63 Those duties might be the short-term accommodation duty owed to applicants who have a priority need and have become homeless intentionally (Housing Act (1996), s.190(2)(a)), the main housing duty owed to applicants who have a priority need and have not become homeless intentionally (Housing Act (1996), s.193(2)) or the accommodation duty owed to applicants who have a priority need, have not become homeless intentionally and have deliberately and unreasonably refused to co-operate (Housing Act (1996), s 193C(4)).

accommodation. It also includes the steps the applicant agrees to take, or is told by the local housing authority would be reasonable for him or her to take.[64]

The consequences of a 'deliberate and unreasonable refusal to cooperate' decision are less harsh for applicants in England who have a priority need and have not become homeless intentionally than they are for applicants in Wales.[65] In England, a local housing authority continues to be under a duty to accommodate those applicants, although that accommodation duty can be ended by the offer of a suitable six-month Assured Shorthold Tenancy.[66]

In both England and Wales, the intention behind these new statutory duties is that the help provided will not be routine, standard advice, putting the onus to find accommodation on the applicant. Instead it will be part of a new atmosphere, where local housing authorities understand the homeless applicant's situation and make every effort to help him or her find accommodation.

As in Wales, there remain no enforceable legal duties to accommodate those who are sleeping rough. This makes the English and Welsh legal safety net weaker in this specific respect than several other European countries.[67]

Unlike Scotland, but similar to the current position in Wales, the priority need test remains in force. This means, as has been the case since 1977, the only applicants guaranteed accommodation are those assessed as having a priority need and not intentionally homeless.

While, unlike in Wales, there are no plans to limit the scope of the intentionality test in the case of families with children, the test becomes of less relevance. This is because it does not apply at the prevention or relief stage. However, when it comes to the final duty to secure accommodation for priority need applicants, the test remains.[68]

It remains to be seen what affect the power for local housing authorities to discharge their prevention and relief duties on the grounds that someone has 'deliberately and unreasonably refused to cooperate' will have. The intention is that such a decision would be a last resort.[69] An applicant must first receive a written warning and be given an opportunity to comply.[70] And the wording of the statute, with the Code of Guidance, makes clear that the bar is set high; higher than in Wales. An applicant must be acting deliberately, not foolishly.

64 Housing Act (1996), s 189A. This is a stronger commitment than in Wales, where there is an obligation to carry out an assessment of the applicant's case (Housing (Wales) Act s 62) but the personalised housing plan is contained only in the Welsh Code (para 10.19 and Annex 17).

65 Housing Act (1996), s 193C contains a duty to accommodate applicants who have a priority need, have not become homeless intentionally and have deliberately and unreasonably refused to co-operate. In Wales, any applicant who is given notice of a decision that he or she has deliberately and unreasonably refused to co-operate will find that any duty to owed to him or her has ended: Housing (Wales) Act (2014), s 79(5).

66 Housing Act (1996), s 193C(6(a), in contrast to the Housing Act (1996), s 193(2), main housing duty which can come to an end on the acceptance or refusal of a suitable 12 month assured shorthold tenancy: Housing Act (1996), s 193(7AA).

67 Fitzpatrick, S., Quilgars, D., and Pleace, N. (2009) *Homelessness in the UK: Problems and Solutions*. Coventry: CIH.

68 Housing Act (1996), s 190(2)(a) as amended.

69 The Homelessness Code of Guidance for Local Authorities (MHCLG 2018, English Code) does not use those specific words, but its intent is very clear from the contents of paras 14.43 – 14.59.

70 Housing Act (1996), s 193B(4) and (5).

Examples given in the Code of Guidance are where an applicant persistently failed to attend property viewings or appointments without good reason.[71] And as noted, unlike in Wales, even applicants who have deliberately and unreasonably refused to cooperate will be entitled to accommodation. This is providing they have a priority need and have not become homeless intentionally. Although the minimum tenancy length for discharge of duty will be six not 12 months as it is in the main discharge of duty.[72]

The vigorous adoption of Housing Options from 2003 onwards can be considered both a strength and a weakness of the English model to date. The strength lies in the pro-active, problem-solving approach. The weakness is the risk of unlawful gatekeeping. A key contribution of recent reforms in England and Wales is to bring these formerly non-statutory activities into the heart of the legislative framework. This means that Housing Options activities can be better regulated, and also encouraged, as local authorities engaging in good preventative work will no longer be exposed to legal challenge.

One particular aspect of gatekeeping addressed by *The Homelessness Reduction Act (2017)* is the widespread failure to take applications for homelessness assistance from private tenants who have been served with a section 21 notice.[73] This notice gives them two months to leave the property. This practice should now change, as the Act is clear that someone who has been served with a valid section 21 eviction notice is threatened with homelessness. Consequently the duties to carry out an assessment of his or her case, draw up a personalised plan and engage in and engage in prevention activities, will apply.[74]

13.5 The principles of an 'ideal' statutory homelessness system

Using the learning from all three statutory homelessness systems in Great Britain, and that gained from international comparisons, Davies and Fitzpatrick have laid out the key principles of an ideal statutory homelessness system.

1 **Principle 1: For those who face the imminent threat of homelessness (within 56 days), a set of robust prevention duties should be in place.** This is to ensure all reasonable steps to avert or resolve the relevant housing crisis are taken before homelessness occurs. These prevention duties should apply to all household types. Secondary legislation should define the minimum list of interventions that local authorities ought to have available in relevant cases. This list should be updated periodically as new interventions are shown to be effective. At this stage of the process in particular, there should be an attempt to minimise the use of the potentially stigmatising term 'homeless' altogether. The emphasis should instead be on addressing housing need, options or solutions.

These local authority duties should be part of a wider systemic approach where upstream forms of prevention are targeted at groups that we know to be at high risk of homelessness. This also requires a duty to prevent homelessness being placed upon key public agencies outside local authorities, such as the prison service (see Principle 6(b)).

71 Housing Act (1996), s 193B and English Code of Guidance paras 14.49 – 14.59

72 Housing Act (1996), s 193C.

73 Housing Act (1996), s 21

74 Housing Act (1996), s 175(5), as inserted by HRA 2017.

2 **Principle 2:** Where reasonable steps to prevent homelessness are unsuccessful, **a complete statutory safety net providing access to suitable settled accommodation must extend across all homeless people.** This is regardless of household type or level of vulnerability, with temporary accommodation provided in the interim. **This means that the priority need criterion must be abolished in England and Wales.**

The immediate safety net is access to emergency accommodation, which must be suitable. This will require resources to be allocated by governments.

Crucially, however, the form of settled accommodation used to discharge the main statutory duty to relieve homelessness should be broadly drawn. It should be suitable which includes affordable. This means that rental costs do not need topping up from subsistence benefits and that the accommodation can reasonably be argued to be offered on terms equivalent to those enjoyed by other people in the broader population. For example, when homeless people are offered social housing, they should be given the same number of suitable offers as other housing applicants.

For those made offers in the private rented sector, the minimum tenancy length should match that which is standard across the sector. We would like to see the length increased substantially from the current norm of six or 12 months in English and Welsh Assured Shorthold Tenancies (see Chapter 11, 'Housing solutions').

Scope should also be allowed for discharge of duty into innovative forms of accommodation. This could include: Housing First programmes, where participants should have social or private sector mainstream accommodation, supported lodgings, and other forms of longer-term 'community hosting' in appropriate cases.[75]

This breadth of rehousing options helps to promote a problem-solving ethos. It is also pragmatic. Even in the ideal homelessness system, it will never be possible to deliver the perfect housing outcome desired by every applicant, and expectations must be managed. It also reinforces the homelessness system's role as an emergency safety net which reinserts people back into the housing market and ordinary accommodation settings as rapidly as possible.

3a **Principle 3(a):** This broadening of the range of discharge options open to local authorities will weaken, but not sever the link between homelessness duties and social housing allocations. Statutory homeless people should continue to receive reasonable preference in local authority housing allocations, and **housing associations in England and Wales should give homeless households 'reasonable preference' in their allocation policies**, as is already the case in Scotland. A review of the operation of nominations agreements in all three countries in Great Britain would be beneficial. These are a constant source of complaint from both local authorities and housing associations, but only limited evidence is available on current practice at local level.[76]

75 Watts. B, Johnsen, S., and Sosenko, F. (2015) *Youth Homelessness in the UK*. Edinburgh: Heriot-Watt University.

76 Greaves, F. (2017) *Tackling Homelessness Together: The importance of local authorities and housing associations working in partnership*. The University of Sheffield, Chartered Institute of Housing. https://www.sheffield.ac.uk/polopoly_fs/1.731754!/file/TacklingHomelessnessTogether2.pdf

"I'd been out for my birthday three years ago. After the party I decided to stay over at my friend's house while some other people stayed at my flat. When I got back the next day one of the neighbours told me there had been a fire. The fire brigade said it was started by an unextinguished cigarette falling on the sofa while everyone was asleep.

I went to the council but they wanted to know who had started the fire and they didn't believe me when I said I didn't know, so they classed me as intentionally homeless. I had to wait six months to get any help. I stayed with friends and then I went to a bed and breakfast but I couldn't afford it for long so I started to sleep in graveyards, behind shops, in doorways or in the park. I was working as an electrical engineer, but I started going to work completely shattered from sleeping rough. Eventually the people I was working for asked what was wrong. They said it would be best if I left to sort out my accommodation first and go back after that. The more I slept rough the harder it became.

I was in the Royal Scots Infantry for six years when I was younger. I've had some help from an ex-soldier's charity who nearly got me into a flat last year but that fell through at the last minute and I've not heard from them since then. I'm hoping to move in with my mum in a few weeks' time which will make it easier to sort these things out. Until then I'm just living day to day.

The winter shelters are not nice places. I'd rather stay on the street than go there. But if I don't make enough I may have no choice. There are some heating vents you can find near the station but people do die out here."

Billy, Edinburgh

3b Principle 3(b): Intentionality should be abolished in its current form. The current intentionality test goes far beyond what is required to control what might be considered to be any perverse incentives to access homelessness assistance. There is a strong case for moving away from this test, and instating another. It should be more tightly defined and have strictly limited consequences.

A new test would involve focusing on deliberate manipulation of the homelessness system. For example, this could involve collusion between an applicant and parent or householder who has excluded them. It would ideally require local authorities to demonstrate that the applicant had actually foreseen that their actions would lead to their becoming homeless. At present, all that must be shown is that the act that led to the loss of accommodation was deliberate, not that the link between this act and homelessness was foreseen or even foreseeable by the applicant.[77]

The proposed consequence of this deliberate manipulation test would be restricted. Under this proposed scheme, households found to deliberately manipulate would receive no additional preference in social housing allocations because of their statutory homeless status. This test would have no bearing on any other homelessness-related entitlements.

4 Principle 4: Local connection should cease to be a bar to assistance. In proposing this, Fitzpatrick and Davies accept the need to fairly distribute the burden of tackling homelessness between local authorities. However, they propose better ways to manage this necessity than the current crude local connection rules. Although the current rules are intended simply to determine which local authorities have a duty to provide settled housing, they are often used (unlawfully) as a gatekeeping filter. Four potential ways forward are suggested, none of which are mutually exclusive.

- Suspend or abolish the local connection. But allow it to be reapplied for specific local authority areas suffering undue pressure because of a net inward flow of applicants (as evidenced by research across local boundaries). This is effectively the option legislated for in *The Homelessness etc. (Scotland) Act (2003)*, which has remained uncommenced.
- Suspend or abolish the local connection rules but make allowance for money/resources to follow people, so that applicants can apply as homeless wherever they wish to, but local authorities can reclaim costs from each other where they accept applicants whose local connection lies elsewhere. This may be challenging to implement, but there are international examples that could provide helpful guidance.[78]

77 The statutory test contains the reverse of this approach. Where a local housing authority is satisfied that an applicant was actually unaware of the consequences of his or her actions, and he or she had acted in good faith, then an act or omission will not be considered to be deliberate: Housing Act (1996), s 191(2). Our formulation would turn this approach on its head: so that for an act or omission to be considered deliberate, a local housing authority would have to be satisfied that the applicant had foreseen the consequences.
78 Mackie, P. and Thomas, I. (2016) *Transitory Single Homelessness in Wales*. Cardiff: Cardiff University.

- Improve and extend the statutory definition of the current local connection rules to be more generous/realistic about how and when people have established a local connection.[79]

- Encourage, through the codes of guidance, local authorities to cooperate with each other in local connection referrals, rather than enter into turf-wars as to which local authority might be responsible. Local authorities should also be encouraged to cooperate on the provision of suitable accommodation. For example, the receiving local authority considers whether accommodation can be secured in the district of the original local authority.[80]

5 Principle 5: Appropriate provision must be made for households who remain homeless after exhausting their entitlements under the homelessness statutory framework, particularly families with dependent children. If households refuse suitable offers of accommodation made by a local housing authority then there comes a point where that authority's duty towards them is discharged. It is possible they may remain homeless. However, children at risk of homelessness must be protected from the consequences of their parents' decisions, however ill judged, for at least two reasons. First, children's vulnerability and inability to fend for themselves in the housing market provides robust justification for ongoing state intervention and protection. Second, there can be no legitimate moral basis to hold children responsible for decisions over which they have no control. *The Children Act (1989)*, *The Social Services and Well-being (Wales) Act (2014)* and *The Children and Young People (Scotland) Act (2014)* should be amended to make it clear that, in these circumstances, children's services will keep the family together. Amendments should also make it clear that where the children are at risk of homelessness, accommodation will be provided for the whole family.[81]

Similarly, for vulnerable single homeless people, strengthening of the duties of adult social care services will be key. There should also be appropriate opportunity to make a fresh application for homelessness assistance.[82]

79 Housing Act (1996), s 199; Housing (Wales) Act (2014), s 81; Housing (Scotland) Act 1987, s 27.

80 Local housing authorities are not required to accommodate applicants within their own districts. If they take the view that suitable accommodation would be located in another local housing authority's district, they are entitled to find that suitable accommodation and offer it to the applicant, either as a private rented sector offer or by renting it from a private landlord themselves, provided that they give notice to the other local housing authority under Housing Act (1996), or s 208, Housing (Wales) Act 2104, s 91.

81 Such accommodation need not be long-term accommodation. This principle envisages that children's services ensure that suitable emergency accommodation remains available while it works with the family to find and keep longer-term suitable accommodation.

82 The current test for acceptance of a new application in England is that there are new factual circumstances that were not present when the previous application was disposed of: *R (Hoyte) v Southwark LBC* [2016] EWHC 1665, [2016] HLR 35, Admin Ct. In practice, local housing authorities tend to exercise gatekeeping and simply turn away applicants who are trying to make fresh applications.

"I was in and out of refuges as a child because my mother was always in bad relationships. My aunt then fostered me and my sister [in Ireland] for 16 months, but social services separated the rest of us [three other siblings] because we all had different fathers.

Eventually [I went] back to Wales just for a holiday, but I never returned.

I couldn't go back to my mother in Port Talbot, but the council refused to help me because I wasn't registered there. So I slept on the streets in Swansea; I ended up sleeping rough in Port Talbot under a bridge until social services in Neath put me in a hostel where I was raped. I didn't tell the staff about it at the time. I was too ashamed.

I then got with a boy I met in there and moved into his flat when he was housed. I fell pregnant when I was 18, but my ex had become violent by then, so they moved me into temporary accommodation for four and a half months until my daughter was born.

We split up, but Swansea still refused to help me because I was now registered in Neath. So I was made homeless again. I'm 23 now and am married to a man I love. We're also expecting another baby in three months, but my husband has had problems with depression. And recently had a breakdown that meant we are living separately.

Housing won't give me a permanent address until they're sure the baby won't be taken into care when he's born. I've got an amazing support network around me now, so they've said it's looking very positive at the moment, but without a permanent address it's still unsure. I can make it safe, but stable in temporary accommodation is impossible."

Sav, Swansea

6a Principle 6(a): Local housing authorities should have a duty to provide housing support in relevant cases.

All relevant forms of support should form part of the personalised plans required by the recent legislation in England and guidance in Wales. These plans should extend beyond housing support, to health, social care and other relevant support, bearing in mind that not all homeless households will have additional support needs.

Scotland already has an explicit housing support duty in place,[83] while in Wales[84] and England[85] the relevant duty is limited to making an assessment of support needs. A statutory duty to meet housing support needs would be especially beneficial in England, where the provision of housing support services has been cut by around two-thirds since 2010.[86]

6b Principle 6(b): Other public bodies should have robust duties to both prevent homelessness (see Principle 1) and to cooperate with local housing authorities in relieving homelessness. For example, by providing relevant health and social care support services.

Cooperation duties in Wales were somewhat strengthened by *The Housing (Wales) Act (2014)* in relation to social landlords and children's and adult's services.[87] While in England, *The Homelessness Reduction Act (2017)* has imposed on some public authorities a new duty to refer those at risk of homelessness to local housing authorities.[88] However, stronger statutory duties to both prevent and alleviate homelessness on the part of other public bodies are likely to be more effective. This is especially true if embedded in the core legislative frameworks that structure how these bodies operate rather than isolated within homelessness legislation.

A duty to prevent homelessness placed upon key public agencies outside local authorities will support the prevention duties on local authorities discussed in principle 1. Key here would be both duties to prevent and cooperate integrated into social services/social work services, health, and criminal justice legislative frameworks.[89]

7 Principle 7: There should be a **robust but proportionate regulation, monitoring and inspection regime of how local authorities, other public bodies, and social housing providers discharge their duties**. The Scottish Housing Regulator has played a key (but reducing) role in the monitoring and inspection of homelessness services in Scotland. This could be looked to as a starting point in building a model for England and Wales.[90]

83 Housing (Scotland) Act (1987), s 32B inserted by Housing (Scotland) Act (2010)
84 Housing (Wales) Act (2014), s 62(5)(c)
85 Housing Act (1996), s 189A(2)(c), as inserted by HRA 2017
86 Hastings, A., Bailey, N., Bramley, G., Gannon, M. and Watkins, D. (2015) *The Cost of the Cuts: The Impact on Local Government and Poorer Communities*. York: Joseph Rowntree Foundation.
87 Housing (Wales) Act (2014), s 95.
88 Housing Act (1996), s 213B, as inserted by Homelessness Reduction Act 2017
89 In England, there is a new duty on pubic authorities to refer, with the person's consent, to local housing authorities certain people whom they have reason to believe may be homeless or threatened with homelessness: Housing Act (1996), s 213B. The duty has come into force on 3 April 2018 but the list of specified public authorities on whom the duty falls does not come into force until 1 October 2018: Regs 1(3), 10 and Schedule Homelessness (Review Procedures etc) Regulations 2018, SI 2018/223. The list of specified public authorities includes prisons, hospitals, the Department for Work and Pensions, social services and education authorities. It remains to be seen whether this will result in more people obtaining help to prevent or relieve their homelessness.
90 Scottish Housing Regulator (2014) *Housing Options in Scotland: A Thematic Inquiry*. Glasgow: Scottish Housing Regulator.

A regulator, with a rolling programme of inspection and thematic reports, would be even more crucial in England. This is because there are a large number of local authorities and it is difficult for the government to keep a grip on what is happening across the country. This regulatory role becomes more important in direct proportion to the amount of flexibility that authorities are allowed in discharge of their statutory duties. It should also regulate housing associations to ensure effective cooperation with local housing authorities in the discharge of statutory homelessness functions.

8 Principle 8: A more open system of individual reviews and appeals. If the principles above are adopted there would be fewer challenges to local authority decisions. This is because everyone would be entitled to some form of accommodation. Furthermore, the issues of whether an applicant is vulnerable and/or has become homeless intentionally would have fewer significant consequences. The disputes that might arise could then be over the suitability of the accommodation offered. Where disputes occur, the following are required.

- An opportunity for applicants to access a review from a body independent from the local authority, eg a first-tier tribunal or separate statutory body. This would mean that applicants would be reassured of independence and impartiality.
- The availability of good free or means-tested legal advice. This should cover the housing options generally available, availability of homelessness assistance, and the resources available to assist someone to challenge decisions. Early and free advice allows for applicants to have realistic options, to be well informed and, when they do have to challenge decisions, to do so well. External advice assists good internal decision making.[91]

9 Principle 9: Much more emphasis should be placed on training and supporting frontline homelessness officers. They work in a quasi-judicial capacity, yet there is no specified standard of educational attainment or prescribed professional qualification for their roles. Under Housing Options, and certainly under the ideal homelessness system, they would be expected to develop new problem-solving, person-centred and creative approaches. These approaches require different skills to those used in statutory assessments. **An ongoing emphasis on professional training and skills development among frontline homelessness workers is essential to the successful implementation of progressive legislation.**[92]

91 Early advice also has the potential to prevent or resolve disputes at an early stage. It might achieve an outcome which satisfies the applicant or, at least, focuses the mind of the decision-maker on any new facts arising and the correct legal test.
92 Mackie, P., Thomas, I. and Bibbings, J. (2017) Homelessness prevention: Reflecting on a year of pioneering Welsh legislation in practice. *European Journal of Homelessness* 11 (1) , pp. 81-107. More training was recommended by Shelter Cymru in its review of Housing (Wales) Act (2014), Part 2: *Reasonable Steps: Experiences of Homelessness Services under the Housing (Wales) Act (2014)* (2016, Shelter Cymru and Oak Foundation). It is surprising that no training was organised by MHCLG or similar bodies for local housing authorities in England on the implementation of the *Homelessness Reduction Act (2017).* To the best of the authors' knowledge, such training as was available was from commercial providers.

10 **Principle 10:** Changes in immigration legislation, with impacts upon housing, social welfare and employment, have created a 'hostile environment' for certain groups of migrants to the UK.[93] These changes have been associated in recent reports with an increase in destitution among refused asylum seekers in particular.[94] Various groups of migrants to the UK have differing legal statuses, and not all will be able to enjoy the same access to homelessness entitlements as UK citizens. However, it is unacceptable in a wealthy country to have people sleeping and starving on our streets. Davies and Fitzpatrick suggest that **at the very least minimum subsistence benefits and basic accommodation must be made available to all regardless of immigration status.** Chapter 12, 'Ending migrant homelessness', suggests further reforms to open up access to the statutory system, alongside other reforms for different groups of migrant homeless people.

13.6 Examining proposals for legal reform in each country

Having established the principles that should be applied in the ideal homelessness system, the section below looks at what is needed to achieve this in each country. Table 13.1 summarises the extent to which the principles above are already met in the three countries of Great Britain.

This section does not prescribe a legislative vehicle or remedy in each case. It is assumed, however, that in each context there is a need for a comprehensive parliamentary/assembly process to establish these provisions.

England and Wales have gone furthest in implementing a robust preventative model. Scotland has some catching up to do in this respect, notwithstanding the rolling out of Housing Options since 2010 (Principle 1).[95] There is no equivalent in Scotland of the flexible form of homelessness relief now provided for in the English and Welsh legislation. But, the universal dimension of Principle 2 is achieved via the abolition of priority need in Scotland. In England and Wales there is no guarantee of a suitable housing offer for all homeless households.

93 Hill, A. (2017) *'Hostile environment: the hardline Home Office policy tearing families apart'*, The Guardian, 28th November. https://www.theguardian.com/uk-news/2017/nov/28/hostile-environment-the-hardline-home-office-policy-tearing-families-apart

94 NACCOM (2017) *The No Accommodation Network. Annual Report 2016-17.* Newcastle: NACCOM.

95 Note that the Scottish Government has accepted a recommendation by the Homelessness and Rough Sleeping Action Group (HARSAG) that it should examine the case for introducing a comprehensive homelessness prevention duty on local authorities and other public bodies. Scottish Government (2017) *Ending Rough Sleeping in Scotland; An interim report on the activity of the Homelessness and Rough Sleeping Action Group*. https://beta.gov.scot/publications/ending-rough-sleeping-in-scotland-interim-report/

Table 13.1: Summary of compliance with 'perfect homelessness system' across Great Britain

	England	Wales	Scotland
Principle 1: Robust prevention	partial	complete	partial
Principle 2: Universal, flexible relief	partial	partial	partial
Principle 3(a): Priority access to social housing; **Principle 3(b):** except in intentionality cases	partial / minimal	partial / partial	complete / partial
Principle 4: Local connection no bar to assistance	minimal	partial	partial
Principle 5: Protection for those who have exhausted homelessness entitlements	minimal	minimal	minimal
Principle 6(a): entitlement to housing support **Principle 6(b):** prevention and relief duties on other public bodies	minimal / partial	minimal / partial	complete / minimal
Principle 7: Inspection and regulation	minimal	minimal	partial
Principle 8: Reviews and appeals: reconsideration of factual circumstances by independent body; availability of good free or means-tested legal advice	partial	partial	partial
Principle 9: Qualifications and professional standards	minimal	minimal	partial
Principle 10: Minimum safety net for migrants	minimal	minimal	minimal

minimal compliance

partial compliance

complete compliance

Priority access to social housing for homeless households is better protected in Scotland than in either England or Wales (Principle 3a). But in none of the jurisdictions has intentionality been abolished, or the definition of intentionality been narrowed to match the specific 'mischief' that it was intended to deal with (Principle 3b). The problem of local connection as a barrier to assistance has not been addressed in any of the three countries (Principle 4).[96]

The protections for those who exhaust their statutory entitlements under the homelessness legislation are weak across all three countries at present (Principle 5). An entitlement to housing support is already established in Scotland, but not in the other two countries (Principle 6(a)).

There has been some recent strengthening of the responsibilities of other public bodies in England and Wales, though these do not go far enough (Principle 6(b)).[97] Inspection and regulation arrangements are stronger in Scotland than in either of the other two countries at present (Principle 7). On reviews and appeals (Principle 8), homeless applicants are able to access a wide scale reconsideration of their factual circumstances in all three countries of Great Britain, but not by an independent body. Early advice is available, but funding cuts to housing advice and legal aid means that in practice it can be very difficult, or sometimes impossible, to obtain.

All three countries have considerable work to do to satisfy both Principles 9 and 10, although Wales has provided training for the local authority workforce following the passage of *The Housing (Wales) Act (2014)*.

13.7 Wider reforms

There are a number of factors that critically affect the functioning of even the most ideal of statutory homelessness systems. Below are the most important factors, each of which requires wider governmental attention. However, the absence of one or more of these factors should not be considered a bar to making progress with the legislative agenda. Previous experience indicates that while an absence of wider structural reform can hamper progress on homelessness, marked success can be achieved in even the most difficult contexts.[98]

First, international comparative evidence indicates that a strong policy direction and strategic grip from central government is required to enforce national minimum standards and to enable best practice to be scaled up.[99] In this respect, it is vital in England, Scotland and Wales, that legal reform is part of a focused and cross-government plan to end homelessness.

Second, and perhaps most obviously, the success of an ideal statutory framework relies heavily on a sufficient supply of decent, affordable housing, accessible to those on low incomes, and located in the places that they need to live. Chapter 11, 'Housing solutions', specifically addresses this point, with detailed analysis of the housing supply requirements of homeless households. Chapter 11 also describes the reforms necessary to ensure the private rented sector becomes a more secure, affordable and higher quality option for people at risk of, or who have experienced, homelessness.

Third, the benefit system is crucial in allowing local authorities to make suitable offers of accommodation under the statutory system. Chapter 10, 'Making welfare work', details the changes required to ensure that housing allowances meet the actual rents being charged to low-income households in the private rented sector.

Fourth, if local authorities are to continue to be charged with statutory and strategic duties to address homelessness, they must be appropriately resourced to deliver these responsibilities.

13.8 Conclusion

This chapter envisages a new homelessness system that melds the best from England, Scotland and Wales. This ideal contains the following features:

- an overwhelming emphasis on prevention/early intervention
- it moves away from a stigmatising concept of homelessness altogether wherever possible
- it provides a complete statutory safety net, with entitlement to settled housing, regardless of household type or vulnerability
- it ensures that obligations are imposed not just on housing authorities, but also upon health, justice and other public bodies, with housing associations playing a full role
- it makes reasonable demands on applicants to act reasonably in cooperating with local authorities to resolve their housing crises
- it offers far fewer opportunities for punitive or harsh judgments, with a more humane, effective and just approach to assessing individual circumstances and choices.

With wider contextual factors taken into account, this is a framework of law that is the natural extension to the post *Housing (Homeless Persons) Act (1977)* settlement throughout Great Britain. It is a bold vision, but at its heart is about completing the safety net that already exists for some.

Every lever possible at our disposal in driving down homelessness must be seized. The law is one such crucial lever.

96 Table 1 acknowledges that the Scottish Government has recently accepted recommendations from the Homelessness and Rough Sleeping Action Group that would, if implemented, move it a considerable way towards satisfying Principles 3b and 4, in part by commencing extant sections of the *Homelessness Etc. (Scotland) Act (2003)*. It also acknowledges that in Wales the practical scope of both the local connection and intentionality tests have been, or will be, narrowed in significant ways.

97 Housing (Wales) Act (2014), s 62(5)(c)

98 Busch-Geertsema, V. and Fitzpatrick, S. (2008) 'Effective homelessness prevention? Explaining reductions in homelessness in Germany and England', *European Journal of Homelessness*, 2: 69-95.

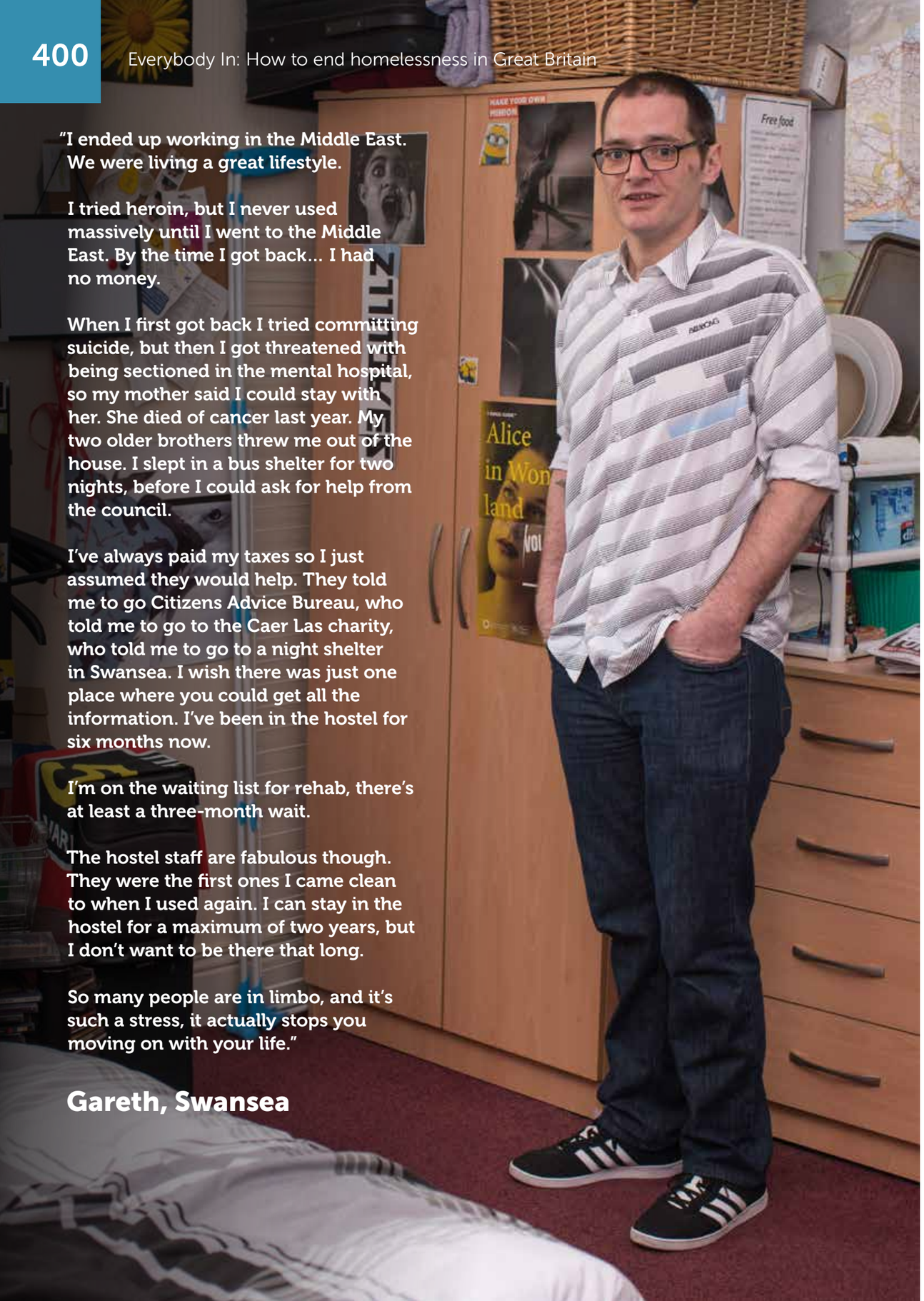
99 National Audit Office (2017) *Homelessness*. https://www.nao.org.uk/wp-content/uploads/2017/09/Homelessness.pdf

13.9 Summary of recommendations

As already noted in this chapter, the table of summary recommendations for national governments reflect agreed principles, but are entirely written by Crisis.

England/Westminster	Scotland	Wales
• Place a duty on all relevant public bodies to prevent homelessness and to cooperate with local housing authorities in relieving homelessness. • Set out in secondary legislation a mandated set of activities that local authorities should have available to them to help prevent and relieve homelessness. • Place a duty on local authorities to provide the housing support that has been identified as needed via a personalised housing plan. • Abolish the priority need criteria. • Introduce a duty to provide immediate emergency accommodation to all those with nowhere safe to stay until priority need is abolished. • Ensure that appropriate provisions are made for households who remain homeless after exhausting their entitlements under the homelessness statutory framework. • Ensure housing associations give 'reasonable preference' to homeless households in their allocations policies. • Abolish intentionality in its current form and introduce a new test focusing on deliberate manipulation of the homelessness system.	• Introduce a statutory duty to prevent homelessness for all households who are at risk of becoming homeless within 56 days, regardless of priority status, local connection, intentionality or migration status. • Place a duty on all relevant public bodies to prevent homelessness and to cooperate with local housing authorities in relieving homelessness. • Set out in secondary legislation a mandated set of activities that local authorities should have available to them to help prevent and relieve homelessness. • Ensure that appropriate provisions are made for households who remain homeless after exhausting their entitlements under the homelessness statutory framework. • Abolish intentionality in its current form and introduce a new test focusing on deliberate manipulation of the homelessness system. • Ensure that the regulation, monitoring, and inspection of how local authorities, other public bodies, and social housing providers discharge their homelessness duties is fit for purpose.	• Place a duty on all relevant public bodies to prevent homelessness and to cooperate with local housing authorities in relieving homelessness. • Abolish the priority need criteria. • Introduce a duty to provide immediate emergency accommodation to all those with nowhere safe to stay until priority need is abolished in Wales. • Place a duty on local authorities to provide the housing support that has been identified as needed via a personalised housing plan. • Ensure that appropriate provisions are made for households who remain homeless after exhausting their entitlements under the homelessness statutory framework. • Ensure housing associations give 'reasonable preference' to homeless households in their allocations policies. • Abolish intentionality in its current form and introduce a new test focusing on deliberate manipulation of the homelessness system.

England/Westminster	Scotland	Wales
• Abolish local connection criteria for rough sleepers, and ensure it no longer presents a barrier to assistance for anyone threatened with or experiencing homelessness. • Ensure that there is a robust but proportionate regulation, monitoring and inspection of how local authorities, public bodies and social housing providers discharge their homelessness duties. • Ensure there is a more open system of individual reviews and appeals and access to free or means-tested legal advice. • Introduce a funded programme of professional support and training for local housing authority staff. • Ensure that short-term emergency accommodation and access to immigration advice is provided for migrants who are homeless or at imminent risk of becoming homeless. • Consider how best to grant access to the statutory homelessness system for all migrants. • At a minimum, ensure that all migrants at risk of becoming homeless within 56 days are eligible for support under the statutory duty to prevent homelessness.	• Abolish local connection criteria for rough sleepers, and ensure it no longer presents a barrier to assistance for anyone threatened with or experiencing homelessness. • Ensure there is a more open system of individual reviews and appeals. • Introduce a funded programme of professional support and training for local housing authority staff. • Provide migrant homeless people access to a minimum of emergency accommodation and access to statutory assistance. • Ensure that short-term emergency accommodation and access to immigration advice is provided for migrants who are homeless or at imminent risk of becoming homeless. • Consider how best to grant access to the statutory homelessness system for all migrants.	• Ensure that there is a robust but proportionate regulation, monitoring and inspection of how local authorities, public bodies and social housing providers discharge their homelessness duties. • Abolish local connection criteria for rough sleepers, and ensure it no longer presents a barrier to assistance for anyone threatened with or experiencing homelessness. • Ensure there is a more open system of individual reviews and appeals and access to free or means-tested legal advice. • Continue and improve the professional support and training programme for frontline homelessness officers. • Ensure that short-term emergency accommodation and access to immigration advice is provided for migrants who are homeless or at imminent risk of becoming homeless. • Consider how best to grant access to the statutory homelessness system for all migrants. • At a minimum, ensure that all migrants at risk of becoming homeless within 56 days are eligible for support under the statutory duty to prevent homelessness.



"I ended up working in the Middle East. We were living a great lifestyle.

I tried heroin, but I never used massively until I went to the Middle East. By the time I got back... I had no money.

When I first got back I tried committing suicide, but then I got threatened with being sectioned in the mental hospital, so my mother said I could stay with her. She died of cancer last year. My two older brothers threw me out of the house. I slept in a bus shelter for two nights, before I could ask for help from the council.

I've always paid my taxes so I just assumed they would help. They told me to go Citizens Advice Bureau, who told me to go to the Caer Las charity, who told me to go to a night shelter in Swansea. I wish there was just one place where you could get all the information. I've been in the hostel for six months now.

I'm on the waiting list for rehab, there's at least a three-month wait.

The hostel staff are fabulous though. They were the first ones I came clean to when I used again. I can stay in the hostel for a maximum of two years, but I don't want to be there that long.

So many people are in limbo, and it's such a stress, it actually stops you moving on with your life."

Gareth, Swansea

Chapter 14:

Homelessness data

To end homelessness, we need to understand and measure the true scale of the problem and use data and insight to ensure we meet this shared aim.

There is a lack of accurate and consistent data on all forms of homelessness across England, Scotland and Wales. The way data is used and understood to drive commissioning decisions and service design also varies.

We need a common framework to evidence and measure progress against the goal of ending homelessness for policy-makers, funders, and practitioners and help them work systematically towards it. This framework should be developed alongside improved and standardised data on all types of homelessness across Great Britain.

14.1 Introduction

Homelessness is transient and can be difficult to quantify. Nevertheless, there are substantial changes that could improve the quality and accuracy of current data collection processes. These improvements would:

i) provide a more robust figure on the level of need and scale of the problem, including demographics and type of homelessness

ii) cover the use and effectiveness of interventions

iii) feed into funding and commissioning decisions to improve service design and delivery to address homelessness.

This chapter examines current data collection methods measuring the scale and profile of:

- rough sleeping
- those receiving homelessness assistance within the statutory framework
- those falling outside it across England, Scotland and Wales.

It then suggests improvements for data collection for each country. These should ensure a more comprehensive and high quality data set to inform decision making for policy and practice and ultimately improve services and outcomes for homeless people.

The final section of the chapter argues these efforts should build on the work by the Centre for Homelessness Impact to develop a shared outcomes framework for homelessness interventions.

14.2 Current homelessness data collection

Rough sleeping

The official national rough sleeping statistics in England are widely interpreted as substantially understating the true scale of rough sleeping.[1] These figures are calculated using a methodology introduced in 2010. The methodology involves counts and estimates from local authorities of the number of people thought to be sleeping rough in a local authority area on a 'typical night'. This night is a single date chosen by the local authority between 1 October and 30 November.[2] It is a snapshot and will not include everyone in the area with a history of rough sleeping. In 2017, 87 per cent of councils provided estimated and 13 per cent counted.[3]

In 2015, the UK Statistics Authority (UKSA), which oversees the validity of official government data, investigated the homelessness statistics.[4] UKSA concluded that government data on rough sleeping in England does not meet standards required to be considered 'national statistics'; it falls short in terms of 'trustworthiness, quality, and value.'[5]

There are also wider categories of people sleeping in precarious and dangerous situations not officially counted in the annual counts and estimates data. These include people sleeping in cars, tents and public transport.

A Heriot-Watt University report for Crisis in 2017 identified a mid-point estimate of 8,000 rough sleepers in England and a further 8,000 people under the cars, tents and public transport category.[6] Heriot-Watt used both secondary data sources and triangulation methods to achieve these estimates.

Notwithstanding the problems with official figures in England, the statistics do show trends over time, and are best regarded as a trend analysis.[7] They also show the rapid upward trajectory of levels since the new methodology was introduced in 2010.

Data collection of demographic information and information about gender, nationality and age have also been introduced. For example, we know that rough sleeping in London has accounted for approximately a quarter of the national problem consistently over the previous seven years.[8] We also know that approximately 14 per cent of rough sleepers are women; and that very few (an estimated 0.1%) are under the age of 18.

The most robust and comprehensive rough sleeper monitoring data in the UK are the statistics collected routinely by the CHAIN system funded by the Greater London Authority in London. This database is able to collect 'flows' of rough sleepers rather than snapshot annual counts.

It allows outreach teams and services to know if someone is new to the street, a returner or a long-term rough sleeper. Data is also collected about: support needs; reason for homelessness; if they have previously been placed in homelessness services (eg emergency accomadation an dlonger term supported housing), and if they have experienced rough sleeping before.

Although the CHAIN database is the most comprehensive dataset on rough sleeping, it does not routinely align with statutory datasets and is only fully accessible to commissioned services in London. Consequently, data does not routinely show whether someone has approached his or her local authority for assistance before experiencing rough sleeping, nor is this reported on.

Non-commissioned services have limited access to the database. This leads to criticisms that those who are more hidden (eg women), or are ineligible for services (eg those with no recourse to public funds), are not recorded.

Some short and long-term homeless accommodation projects record outcomes on the CHAIN database, but this is inconsistent. This means we have an incomplete picture of what happens to rough sleepers in London once moved off the streets.

Scotland, unlike England and Wales, does not conduct an annual rough sleeping count. Instead rough sleeping levels are recorded in the statutory homelessness statistics when people present for homelessness assistance. When they present to Housing Options teams, individuals are asked if they have slept rough the night before or in the last three months. These figures

1 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2018) *The Homelessness Monitor: England 2018*. London: Crisis.
2 Homeless Link (2017) *Counts & Estimates Toolkit 2017 Introduction & intelligence gathering*. London: Homeless Link.
3 The Ministry of Housing, Communities and Local Government (2018) *Rough sleeping in England: autumn 2017*. London: The ministry of Housing, Communities and Local Government.
4 UK Statistics Authority (2015) *Statistics on Homelessness and Rough Sleeping in England*. London: UK Statistics Authority.
5 UK Statistics Authority (2015) *Statistics on Homelessness and Rough Sleeping in England*. London: UK Statistics Authority.
6 Bramley, G. (2017) *Homelessness projections in Great Britain: summary report*. London: Crisis.
7 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2016) *The Homelessness Monitor: England 2016*. London: Crisis.
8 The Ministry of Housing, Communities and Local Government (2018) *Rough sleeping in England: autumn 2017*. London: The ministry of Housing, Communities and Local Government.

are a measure of the 'flow' of people over a year, rather than the 'stock' or point-in-time figures in England that relate to a given night.

The weakness in the published data is that only those applying for local authority assistance will be counted and within a short timeframe of experiencing rough sleeping. This will capture a wider range of people compared to England and Wales because all eligible unintentionally homeless people are entitled to rehousing in Scotland.[9] However, it is likely to underestimate the level and frequency of rough sleeping as many people will not present to their council after they have slept rough.

Research shows that many people sleeping rough need to be found proactively by outreach teams rather than through services waiting for individuals to come to them. [10] It shows that people often experience other forms of homelessness before they become street homeless.[11]

The Scottish Government's Homelessness and Rough Sleeping Action Group has put forward recommendations on data collection. This includes introducing a CHAIN-style system to achieve real-time, by-name data sharing between the agencies working with people who are rough sleeping or at risk of rough sleeping. The system would enable frequent and regular reporting of numbers, locations and other data to support monitoring the reduction in rough sleeping across Scotland.

Welsh Government figures reflect two separate measures. These came into use in 2014 after a five-year gap in capturing any rough sleeping data at all. The first measure is a local authority estimate over a two-week period, and the second is a count on one night. The use of these complementary approaches was in recognition that conducting a nightly street count has several limitations. The Welsh Government has argued that, by comparison with a traditional street count, this hybrid enumeration approach 'provides a better understanding of the incidence of rough sleeping.'[12]

However, there are still limitations to this combined approach. It is still reliant on a snapshot estimate and the two-week log of rough sleeping activity only provides a time-limited enumeration of the issue. The Welsh Government has also recognised that the count is limited in rural and coastal areas due to the wide geographic area covered as part of a count.[13] The Welsh Government has committed to developing a database on rough sleepers in Wales. This is the Street Homeless Information Network,[14] under development by Homeless Link and the homelessness charity, the Wallich.

9 Scottish Government (2018) *Ending Rough Sleeping in Scotland: An interim report on the activity of the Homelessness and Rough Sleeping Action Group Homelessness and rough sleeping action group*. https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group

10 Mackie,P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

11 Mackie, P. and Thomas, I. (2014) *Nations apart? Experiences of single homeless people across Great Britain*. London: Crisis.

12 Welsh Government (unpublished, 2015) *National Rough Sleeping Count, Wales, November 2014.* Cardiff: Welsh Government.

13 Welsh Government (2018) *Statistical first release: National rough sleeper count.* November 2017.

14 National Assembly for Wales Equality, Local Government and Communities Committee (2018) *Life on the streets: preventing and tackling rough sleeping in Wales*. Cardiff: Welsh Government.

Statutory homelessness

All three homelessness legislative systems in England, Scotland and Wales collect data on households who have approached their local authority for assistance. All three data-collection methods have strengths and weaknesses, but the common weakness is that data is only reported for people who have approached their local authority for help.

This approach does not capture forms of homelessness such as sofa surfing and those placed in hostels that are not recorded via statutory homelessness statistics (private hostel placements, for example). There is also no current way of linking data on rough sleepers to longitudinal statutory homelessness data. This means it is not possible to understand or quantify how many people have presented to their local authority before or after they have slept rough.

England

In England, local authorities record the outcomes of decisions for all households who apply for help with their housing when they are currently or imminently homeless. The dataset holds information on 'formal actions' regarding local authority assessments under the homelessness legislation.

This gives overall numbers of people being assessed or 'decisions'. However, it only breaks down to demographics, nationality, household type, support need and reason for approaching for those households who have the full homelessness duty accepted. This is around 50 per cent of total approaches.

Three consecutive *Homelessness Monitors* [15] have also asked local authorities about the overall 'footfall' to their services as an indicator of demand of services. It is consistently reported by two thirds of local authorities that footfall is increasing while the statutory figures have remained fairly stable during the same period. This indicates that the statutory homelessness statistics in England are not a true representation of those approaching for homelessness assistance.

Some people are either being turned away for help or having their homelessness resolved through actions that go unrecorded.

In 2009, local authorities in England began to record data on people who approached for assistance outside of the main homelessness duty. They also record how local authorities have helped people resolve their homelessness before a formal homelessness application has taken place.

Referred to as 'prevention and relief activity' the statistics show to some extent successful prevention action and how this has changed over time. For example, help to prevent homelessness through resolving Housing Benefit problems has increased fourfold since 2010/11.

It is useful to report on the type of prevention and relief activity that local authorities are using. But there is no way of assessing the effectiveness of the interventions, the quality of the service provided and the sustainability of the outcomes for households approaching them for assistance.

These statistics were also deemed by UKSA not to meet the national statistics required standard.[16] The prevention and relief statistics cannot de-duplicate multiple households receiving more than one prevention

15 See Crisis and JRF Homelessness Monitor Series https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/homelessness-monitor/

16 UK Statistics Authority (2015) *Statistics on Homelessness and Rough Sleeping in England. London*: UK Statistics Authority.

and relief activity within the year. And they cannot cross reference with the P1E quarterly statutory returns (data from English local housing authorities on their responsibilities under the homelessness legislation). This means double counting cannot be removed.

The Homelessness Reduction Act (2017) has prompted the introduction of a new system for local authorities to record prevention and relief data, called H-CLIC. This is due to report in July 2018 and will provide information about all households owed a prevention duty including reasons why the prevention duty has ended.

Scotland

In Scotland, homelessness statistics are collected so that each person has a unique identifying number. This allows local authorities to track households/individuals through the homelessness system and can help identify if they have been homeless before. Local authorities can then understand how many households made a unique application for homelessness assistance. The collection method stops double counting and indicates the proportion of households making a repeat application after receiving help.

The HL1 data, which records the number of homelessness applications, is compulsory. Local authorities have to collect it from anyone they have reason to believe is homeless (or will be in 56 days). The PREVENT1 statistics were introduced in 2014. Some people recorded under Housing Options may fill out a homelessness application, but there is no statutory requirement to fill in a PREVENT1 application.

The ability to link both datasets is useful to measure an overall homelessness caseload figure, however there is varied practice in how these are recorded across Scottish local authorities.[17] As in England, there are elements of PREVENT1 that limit the ability to drill down into the specific activities undertaken by local authorities in addressing homelessness prevention.

There are also issues with the HL2 and HL3 data used for monitoring of households placed in temporary accommodation through local authorities homelessness duties. HL3 has been developed to understand more about the length of time households are in temporary accommodation and the proportions of households needing temporary accommodation where an offer was made.

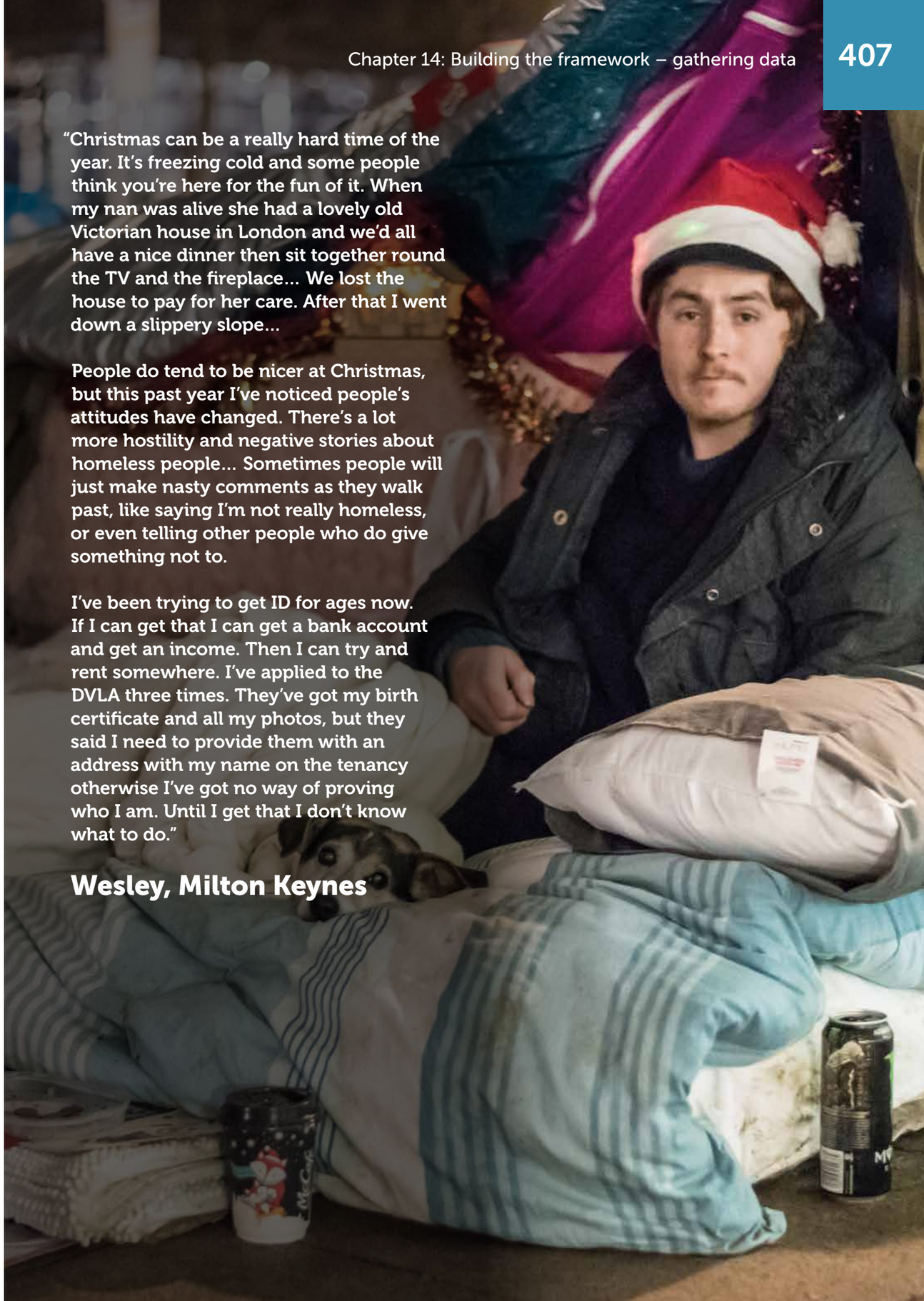
HL3 recording has only been mandatory since 2016. Due to data quality issues HL3 data has not yet been published. Early analysis shows that in some cases there is a 40 per cent discrepancy between local authorities recording of HL2 and HL3 data.[18]

A positive development in the Scottish statutory homelessness statistics has been data linking between 'HL1' and health service data, originally trialled in Fife.[19] This idea of data linkage has the potential to revolutionise our understanding of what works to achieve positive outcomes for homeless people across public services.

17 Mackie, P. M. and Thomas, I. (2015) *Single Homelessness in Scotland.* London: Crisis.

18 Scottish Goverment (2017) *HL3 data collection*. http://www.gov.scot/Resource/0052/00521945.pdf

19 Scottish Government (2018) *HealthHomelessnessDataLinkage*. http://www.gov.scot/Topics/Statistics/Browse/Housing-Regeneration/RefTables/HealthHomelessnessDataLinkage



"Christmas can be a really hard time of the year. It's freezing cold and some people think you're here for the fun of it. When my nan was alive she had a lovely old Victorian house in London and we'd all have a nice dinner then sit together round the TV and the fireplace... We lost the house to pay for her care. After that I went down a slippery slope...

People do tend to be nicer at Christmas, but this past year I've noticed people's attitudes have changed. There's a lot more hostility and negative stories about homeless people... Sometimes people will just make nasty comments as they walk past, like saying I'm not really homeless, or even telling other people who do give something not to.

I've been trying to get ID for ages now. If I can get that I can get a bank account and get an income. Then I can try and rent somewhere. I've applied to the DVLA three times. They've got my birth certificate and all my photos, but they said I need to provide them with an address with my name on the tenancy otherwise I've got no way of proving who I am. Until I get that I don't know what to do."

Wesley, Milton Keynes

Data linkage and tracking individuals through homelessness datasets, and in all public services datasets, would show the extent to which services are meeting the needs of all homeless people. It would also show the cost effectiveness of interventions.

In the US and Denmark, data linkage has explored patterns of service use and the cost associated with them for some time.[20] Large-scale data merging across Great Britain could help to facilitate the cost effectiveness of services such as Housing First and Critical Time Interventions. It could also explore how to improve prevention services and integrate these across statutory services.[21] This approach is highly recommended.

Wales

There have been changes to statutory homelessness statistics in Wales since the introduction of *The Housing Wales Act (2014)*. Statistics are collected on the number of outcomes but not in relation to individual households. This makes it difficult to use them for statistical purposes and attributing the overall need of homelessness. The Welsh system means that each household could have up to three outcomes: prevention; help to secure accommodation (relief), and duty to secure accommodation (discharge).

Unsuccessful prevention should subsequently be assessed as homelessness (duty to help to secure accommodation). Unsuccessful relief may then be assessed as priority need (duty to secure accommodation). This partly explains why the total number of applications is higher than before *The Housing Wales Act (2014)* when decisions were made at a single stage.

Most strikingly, in Wales there is no longer a single figure for homelessness. This is because the same household may be counted under one or more of the preventative, relief and duty to secure categories within a single year. And the categories cannot be totalled together to ascertain an overall figure. As with English data, households are not followed through the system. There is no way of understanding the proportion of households who experience repeat homelessness and, for example, become homeless again after a prevention outcome.

Shelter Cymru have reported that under the new system some people are receiving interventions from partner agencies that do not show up in the official statistics.[22] This is because the type of support that they receive is not being recorded. Support might include unplanned interventions by hostel staff, for example.

This means that the extent of homelessness in Wales, the amount of related work, and the funds required, may all be underestimated.

The Wales Audit Office also recently raised issues around the extent to which StatsWales data on homelessness measured the quality of service provided and local authority success rates in addressing homelessness.[23]

20 Pleace, N. and Culhane, D.P. (2016) *Better than Cure? Testing the case for Enhancing Prevention of Single Homelessness in England*. London: Crisis.

21 Pleace, N. and Culhane, D.P. (2016) *Better than Cure? Testing the case for Enhancing Prevention of Single Homelessness in England*. London: Crisis.

22 Shelter Cymru (2016) *Reasonable Steps: Experiences of Homelessness Services Under the Housing (Wales) Act 2014*. Swansea: Shelter Cymru.

23 Wales Audit Office (2018) *How local government manages demand* – homelessness. Cardiff: Wales Audit Office.

Other forms of homelessness

A main constraint of official or statutory homelessness statistics across Great Britain is insufficient data. This relates to households or individuals not approaching local authorities for assistance, and those identified by outreach teams through annual rough sleeping counts. These cases are often referred to as 'hidden homelessness'. They are generally, but not exclusively, single households who may be living in hostels or other forms of supported accommodation, squatting, living in tents, cars or other forms of transport.

Hidden homelessness can also describe the cases of people forced to live in circumstances that are dangerous or transient. They may not know from one night to the next where they will be living – for example they might be sofa surfing.

In England, Scotland and Wales there are data recorded on the number of bed spaces in hostels and long-term supported homeless accommodation. But these are all a measure of supply of this type of accommodation rather than a measure of demand or need.

Homeless Link manages a database of all homeless accommodation projects across England. This is reported on an annual basis through the publication of a larger piece of research looking at trends and outcomes of this type of accommodation.[24]

While homelessness has been rising in England since 2010 the number of bed spaces has decreased by 17 per cent. This figure also omits numbers of night shelters from its bed space reporting and these are not routinely reported on in other datasets.

Scotland records the hostel data in the HL1. This means it can follow the household through the system. In Wales the data is recorded through temporary accommodation records in the new homelessness statistics. But this is a 'low' estimate; it is only those people accepted as homeless and placed in temporary accommodation who are included in the figure.

The work by Heriot-Watt University in 2017 estimates the level of these other forms of homelessness.[25] This relies on triangulation of several secondary data sets, which extrapolate from survey data. Estimates of people in private hostels or unsupported temporary accommodation, cars, tents and public transport, caravans, squatting and people living in non-residential buildings are included.

It is not easy to access or enumerate forms of homelessness that fall outside official statistics. But there are several voluntary sector services routinely collecting data on individuals they have accommodated or helped into other forms of housing.

There are also local systems and data sets administered across Great Britain which identify numbers of people accessing the homelessness system, their support needs and the assistance they receive. Examples include: the MainStay database in the Liverpool City Region; Glasgow Homelessness Network's Annual Homelessness Monitoring System, and the Wallich's South Wales street-based lifestyle monitor.

24 Homeless Link (2018) *Support for single homeless people in England Annual Review 2017*. London: Homeless Link.

25 Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*. London: Crisis.; Bramley, G. (forthcoming) *Homelessness projections: Core and wider homelessness in Great Britain*, London: Crisis.

Each of these demonstrates that more can be done to bring data sources together. What is missing is the national coordination in all three nations to ensure consistency across localities and a complete approach to data collection.

14.3 An outcomes framework

Improved data collection on homelessness is only part of the solution. To achieve better outcomes we also need to use data in an insightful way to commission and design services for homeless people. One of the ways of doing this is by creating a common outcomes framework.

The purpose of an outcomes framework is to ensure that the aims of policy makers and service providers are consistent.

A good example of such an approach is the Getting It Right For Every Child (GIRFEC) framework for children's services in Scotland.[26] GIRFEC sets out the positive outcomes sought for every child in Scotland and was established by the Scottish Government. It allows for consistent design of services towards achieving agreed outcomes (eg in physical health, safety, and educational attainment) and of reporting progress towards these outcomes.

If we are all working to a common and agreed description of 'homelessness ended' and of the indicators towards that goal, we will have more chance of success. This approach is strongly recommended.

The Centre for Homelessness Impact is currently developing a proposed outcomes framework. Its purpose is to help policy-makers, independent funders and practitioners to design and commission services that produce better outcomes for homeless people.[27]

This framework will provide a consistent explanation of what it takes to achieve better outcomes for people experiencing homelessness, across areas like housing sustainability, employability, and wellbeing.

The development process for this framework is ongoing and it will be designed in consultation with the homelessness sector. It will be published within the next 12 months.

14.4 Recommendations

To improve data and outcomes measures across Great Britain, the following reforms are recommended.

- **Statutory homelessness data collection in England and Wales should be redesigned to follow individuals through their journeys within the homelessness system.** It should be designed to track households and record repeat homelessness and multiple presentations. Data relating to people in temporary or supported accommodation (both statutory and non-statutory services) should also be included.

- **A new CHAIN-like system for recording rough sleeping should be introduced in England, Scotland and Wales.** This should build on the recommendations and ambitions by the Homelessness and Rough Sleeping Action Group in Scotland to build a CHAIN-like system. It should also build on the current work by the Welsh Government and the Wallich to develop the Street Homeless Information Network.

  In addition to recording rough sleeping, these systems should allow data sharing between the agencies working with people who are rough sleeping or at risk of rough sleeping. The system should also be linked to statutory homelessness data and people living in all forms of temporary accommodation including commissioned and non-commissioned hostels and night shelters.

- **Data linkage systems should be established in England, Scotland and Wales.** This will need to include datasets across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services.

  This would require administrative data to be improved across government departments to allow homelessness to be identified in datasets that are being linked.

- **Governments in England, Scotland and Wales should commission the Centre for Homelessness Impact to fill gaps in evidence on homelessness prevention, as well as solutions for certain homelessness groups.** These will include gaps in evidence for LGBT (lesbian, gay, bisexual and transgender) people, BAME (black, Asian, and minority ethnic) groups, and older homeless people.

- **Governments in England, Scotland and Wales should adopt a homelessness outcomes framework to provide consistency across policies and service delivery at national and local level.** It will also ensure improved outcomes for homeless people. The forthcoming framework developed by the Centre for Homelessness Impact across Great Britain will provide the basis for this.

26 Scottish Government (2016) *What is GIRFEC?* http://www.gov.scot/Topics/People/Young-People/gettingitright/what-is-girfec

27 Teixeira, L., Russell, D. and Hobbs, T. (2018) *The SHARE framework: a smarter way to end homelessness. Centre for Homelessness Impact*. https://uploads-ssl.webflow.com/59f07e67422cdf0001904c14/5af4288fdebbda9d1a495a98_SHARE-framework_report_2018.pdf

14.5 Summary of recommendations

England/Westminster	Scotland	Wales
• Statutory homelessness data collection should be redesigned to follow individuals through their journeys within the homelessness system • Introduce a new CHAIN-like system for recording rough sleeping across England • The CHAIN-like system should also be linked to statutory homelessness data and people living in all other forms of temporary accommodation • Establish data linkage systems across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services • Commission the Centre for Homelessness Impact to fill gaps in evidence on homelessness prevention, as well as solutions for certain homelessness groups • Adopt a homelessness outcomes framework	• Introduce a new CHAIN-like system for recording rough sleeping across Scotland • Establish data linkage systems across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services • Commission the Centre for Homelessness Impact to fill gaps in evidence on homelessness prevention, as well as solutions for certain homelessness groups • Adopt a homelessness outcomes framework	• Statutory homelessness data collection should be redesigned to follow individuals through their journeys within the homelessness system • Introduce a new CHAIN-like system for recording rough sleeping across Wales • Establish data linkage systems across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services • Commission the Centre for Homelessness Impact to fill gaps in evidence on homelessness prevention, as well as solutions for certain homelessness groups • Adopt a homelessness outcomes framework

Chapter 15:
Costs and benefits of ending homelessness

The plan has set out a package of solutions that are designed to cover each of our five definitions of homelessness ended. To meet this goal we need investment in the right services.

To end homelessness we need services that prevent it from happening in the first place, that allow a rapid housing-led response; and that give people with multiple and complex needs the support they need to keep their home.

This chapter sets out the costs and benefits of supporting homeless people in our five definitions of ending homelessness.

Table 15.1 Number of households across Crisis' five objectives in Great Britain expected to be supported by the recommended solutions (2018-2041)

Crisis' definition of ending homelessness		2018	2041
Core	**1** No one sleeping rough	8,227	19,819
	2 No one forced to live in transient or dangerous accommodation such as tents, squats, and non-residential buildings	85,699	148,090
	3 No one living in emergency accommodation	64,133	143,256
Wider	**4** No one homeless as a result of leaving a state institution such as prison or the care system	2,422	3,117
	5 Everyone at immediate risk of homelessness gets the help they need that prevents it from happening	85,470	121,646
	Total	**245,952**	**435,928**

Source: figures based on Bramley, G. (Forthcoming) *Homelessness projections: core, wider homelessness across Great Britain – extent, trends and prospects.*

15.1 Introduction

Homelessness generates a financial, social and economic burden for society. As an indication of current spending, in 2015-2016, in England alone, local authorities spent more than £1.1 billion on homelessness. More than three quarters of this was spent on temporary accommodation.[1] In 2014 it was estimated that Scottish local authorities spent £94 million on temporary accommodation for homeless households.[2]

In February 2018, we commissioned PricewaterhouseCoopers LLP ("PwC") to estimate the expected costs and benefits of achieving this plan, through the different combinations of interventions (i.e. solutions) that we have identified are necessary to address and prevent homelessness.

The contents of this chapter are taken from a report published by PwC (2018), Assessing the costs and benefits of our plan to end homelessness.

15.2 Context

As set out in Chapter 3 we have defined what ending homelessness would mean in terms of achieving five objectives; Objectives 1 to 3 refer to people defined as 'core' homeless whereas Objectives 4 and 5 refer to 'wider' homelessness (see Chapter 5, 'Projecting homelessness' for more information)[3]. Drawing on the Heriot-Watt homelessness projections study,[4] PwC have estimated how many households would need to be supported if the definition of ending homelessness is achieved. In total, nearly 246,000 households will need support in 2018 and this will rise to nearly 436,000 by 2041 with unchanged policies (see Table 15.1).

For each definition, as set out in this report, a combination of interventions (ie solutions) have been recommended to meet the stated aim. Table 15.2 explains these interventions and the definitions they are targeted at.

1 National Audit Office (2017) *Homelessness*. https://www.nao.org.uk/wp-content/uploads/2017/09/Homelessness.pdf

2 Hunter, J. and Lindsay, T. (2014) *Temporary accommodation modelling review 2014*. Edinburgh: Association of Local Authority Chief Housing Officers. http://www.welfarereformscotland.co.uk/downloads/Temporary_Accommodation_cost_modelling_report_June14.pdf

3 Crisis (2017) *A proposed definition for ending homelessness*. London: Crisis.

4 Bramley, G. (2017) H*omelessness projections: Core homelessness in Great Britain*, London: Crisis.; Bramley, G. (Forthcoming) *Homelessness projections: core, wider homelessness across Great Britain – extent, trends and prospects*. London: Crisis.

Table 15.2 Combination of interventions (solutions) costed in the model

Interventions	Description	Objectives
Housing First	Housing First prioritises rapid access to a stable home for a homeless person and enables her or him to begin to address other support needs through coordinated wraparound support and case management. Permanent housing is provided without a test of having to be 'housing ready', and there is no obligation to engage in support services to continue to maintain a tenancy. Housing First is built upon the principle of a human right to housing, and harm reduction is taken above any other goals such as sobriety or abstinence. It is a model specifically designed for homeless people with complex and multiple needs. It proves most successful when it forms part of a wider integrated strategy to end homelessness. If required, this is followed by additional support through Housing First or low to medium support.	1-3
Long term supported accommodation	Long term supported accommodation is designed to provide on-site intensive support for people needing specialist care and assistance who have become homeless. It is likely to be most suited to people with long term health needs who are unable to live independently and/or where Housing First is not a suitable option. The recommended package is envisaged to have an initial duration of three years followed by additional support (if required) through long term supported accommodation. In addition, we recognise that some groups require supported accommodation for fixed periods of time until they move into permanent independent accommodation. These include young people and those experiencing domestic violence.	1-3
Low to medium support for housing access	Help to access social and private rented sector accommodation through a social lettings agency and National Private Rented Access Scheme with a Guaranteed Deposit Scheme. The initial duration of the recommended package is two years of housing access support in combination with floating support (see below). This is followed by additional support for two years for those who require it.	1-5
Floating support	Floating support is offered in isolation or combined with the other interventions (eg support to access housing). It takes the form of in-tenancy support that helps people to sustain their housing in the long term.	5
Unsuitable temporary accommodation (7 day restriction)	These are types of temporary accommodation, such as unsupported hostels or bed and breakfast accommodation, that is of low standard with poor basic facilities, including inadequate access to toilet, washing and cooking facilities. We recommend that all homeless households across Great Britain are placed in this type of accommodation for no more than seven days before they move to suitable forms of temporary accommodation or permanent accommodation.	3
Housing Options	Local authority housing options services offer people a range of services to prevent and address their homelessness. These include keeping people in their existing home by means of mediation with their landlord or helping people access housing quickly by providing a deposit or working with a housing association to access social housing. We recommend that all people identified as homeless in the categories addressed in Objectives 4 and 5 receive initial support through Housing Options.	4-5
Critical Time Interventions	A time-limited evidence-based solution, which supports people who are vulnerable to homelessness during periods of transition. It is a housing-led approach that combines rapid housing access with intensive case management. The Critical Time Interventions support package includes one-year support through Critical Time Interventions which is expected to be followed by additional support through a Housing First or low to medium support package.	2-4
Assertive outreach programme	Assertive outreach is a form of street outreach that works with rough sleepers or people who live in tents, cars and public transport with support needs and seeks to end their homelessness.	1-2
Emergency accommodation	This is package is used to help homeless people on a short-term basis until permanent housing is found for them. We recommend there is a local authority duty to provide emergency accommodation for up to 56 days for homeless people who have no safe, suitable, alternative accommodation.	1-2
Supported accommodation for young people	We recommend an intervention for some young homeless people who need supported accommodation for up to two years before they move on to independent accommodation with access to medium to low support or Critical Time Intervention packages	5
Supported accommodation for victims of domestic violence	We recommend a package for victims of domestic violence who are at risk of homelessness. This package includes support for one year through long term supported accommodation which is expected to be followed by additional support through low to medium support or Critical Time Interventions packages.	5

To determine the expected costs and benefits of these solutions, PwC estimated how many households (or individual people) need to be supported by each recommended solution each year in the period from 2018 to 2041. The average unit cost was then multiplied per household (or per person). A similar approach was used to estimate the expected benefits.

The Heriot-Watt homelessness projections study shows the expected stock of homeless households at the end of each year in each category of homelessness. We do not know how many households flow in and out of different categories of homelessness over the whole period being considered as part of the cost benefit modelling (2018-2041). Neither do we know the flows between categories. Nevertheless, the initial stock estimates for each category of homelessness and the year-on-year changes between them (the 'net inflows') can be used to estimate how many households within each definition will need to be supported in each period. For example, for a given category (eg rough sleepers), PwC's analysis assumes that the recommended solutions will initially target the stock of households classed as rough sleepers in 2018.

In the following year (2019), the analysis assumes that (any) additional households that become rough sleepers will need to be supported as well as continuing to support those from previous years who still require support. This is estimated as the difference between the number of rough sleepers in 2019 and the number in 2018. The same approach is applied for all years through to 2041.

PwC's analysis has focused on the expected economic costs and benefits of our recommended solutions to move people out of homelessness as outlined above. In addition to these solutions, the plan also envisages a series of other policy changes. These will help achieve the overall ambition of ending homelessness indirectly through the wider reforms. Examples include:

- Returning the Local Housing Allowance (LHA) to the 30th percentile and retaining the link between LHA rates and market rates post 2020;
- Restricting the use of sanctions on welfare benefits if it will cause homelessness;
- Reinstating entitlement to Housing Benefit (HB) for EEA nationals with job seeker status;
- Extending the move-on period for newly recognised refugees to 56 days (currently 28 days);
- Creating a national register of landlords in England;
- Increasing the supply of affordable housing, specifically social housing, across the Great Britain to address homelessness.

The costs (and benefits) of these other policy changes are not included in PwC's estimates. This is because some elements of these costs (and benefits) are already included in PwC's estimates of the solutions that directly contribute to achieving our objectives (eg cost and benefit attributed to supporting migrants out of homelessness). In addition, these policy changes may also have potential consequences beyond those people defined in objectives 1 to 5 (eg changes to LHA are likely to have a wider impact for people who are not homeless). Further analysis is required to understand how these policies (including housing supply and welfare reforms) may indirectly contribute to achieving our objectives but also their potential consequences for others in society (besides homeless people).

15.3 PwC's approach to estimating the economic costs and benefits

PwC's analysis focuses on estimating the total economic costs and benefits associated with our recommended solutions under each of the five objectives. PwC worked with us to define these solutions, assess the available evidence about their effectiveness and agree a set of assumptions. For each solution, we identified the volume of people that are expected to be supported, the duration of the support, the potential pathways through different solutions and the cost per person supported. For more information please see PwC's full report.

The approach is consistent with the HM Treasury Green Book principles on economic appraisal and evaluation, specifically the treatment of the counterfactual, the approach to estimating economic costs and benefits of policy solutions and the use of discounting.[5]

The anaylsis includes four key features:

- To identify how many households and people are expected to require support each year the analysis used the Heriot-Watt projections of the number of homeless households for the period 2018 to 2041 across Great Britain. These projections assume that current (and already planned) policies remain in place. This research was also used to convert the number of households into the number of people, distinguishing between adults and children.
- It is estimated the economic costs and benefits of our recommended solutions. These are additional to those expected to occur under the current (and already planned) policies.
- It used the best available evidence of the cost per household or person supported for each intervention.
- Four different categories of benefits that potentially arise from ending homelessness were considered:
  - Avoided costs to local authorities through reduced use of homelessness services (eg reduced need for spending on temporary accommodation and other housing and support based services for homeless people funded by local authorities);
  - Avoided costs to the Exchequer through reduced use of public services such as NHS or criminal justice services;
  - Increased earnings from increasing the number of people able to work; and
  - Improved wellbeing as a result of homeless people obtaining secure housing.

5 HM Treasury (2018) *The Green Book: Central Government Guidance on Appraisal and Evaluation* London: HM Treasury.

Table 15.3 Total costs of recommended solutions to achieve Objectives 1 – 5 by objective and region/nation (Present Value (PV), £m 2017, prices)

Region/nation	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Total
Greater London	£602	£3,651	£5,285	£28	£547	**£10,113**
North	£115	£1,457	£936	£23	£225	**£2,756**
Midlands	£62	£838	£582	£13	£152	**£1,646**
South	£150	£1,507	£1,174	£24	£336	**£3,191**
Wales	£18	£370	£101	£3	£42	**£535**
Scotland	£46	£496	£423	£7	£76	**£1,048**
Great Britain	£992	£8,320	£8,501	£98	£1,378	**£19,289**

Source: PwC 2018

15.4 Estimated costs and benefits of ending homelessness

Overall, PwC have estimated that the total discounted costs of the solutions recommended to achieve our definition of ending homelessness between 2018 and 2041 is £19,289m, at 2017 prices.[6]

The costs are distributed across the five objectives, and reflect the number of people projected to be in each of these categories, plus differences in the unit cost of the solutions recommended (see Table 15.3). The largest costs are to achieve Objective 2 (ie no one forced to live in transient or dangerous accommodation) and Objective 3 (ie no one forced to live in emergency accommodation without a plan for rapid rehousing). Together these make up 87% of the estimated total costs.

As described in Table 15.2 we are recommending combinations of interventions (solutions) to achieve our objectives; a different mix of these solutions will support people in each objective. The (weighted) average cost per person supported by the recommended mix of solutions across the five objectives between 2018 and 2041 is £34,460 but ranges from £53,900 – the (weighted) average cost per person of the mix of solutions recommended to achieve Objective 3 – to £6,282 – the average cost per person supported of the mix of solutions recommended to achieve Objective 5 (see Figure 15.1). On average, the cost per person supported of the mix of solutions to address 'core' homelessness (Objectives 1-3) is 3.5 times higher than the average cost of the mix of solutions to prevent homelessness for people at immediate risk of 'core' homelessness (Objectives 4-5).

6 We use discounting to aggregate and compare costs and benefits occurring at different points in time to account for society's time preference for incurring costs and benefits. We use the recommended rate in the HM Treasury Green Book (3.5%) to bring figures to a present value (PV) and compare costs and benefits that are experienced in earlier or later years.

Figure 15.1 Average (weighted) cost per person supported of recommended combination of solutions to achieve Objectives 1-5, by objective (PV, £, 2017 prices)

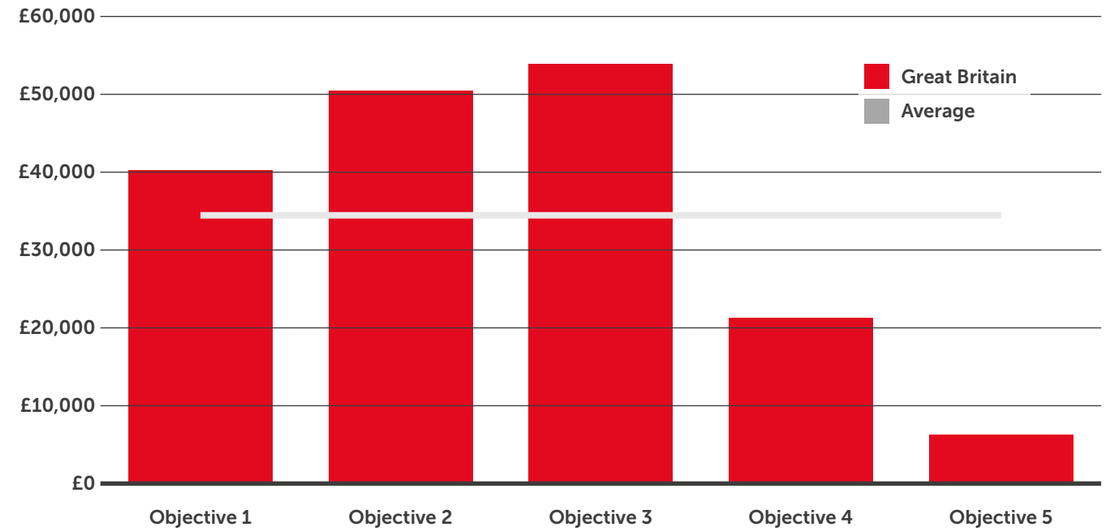
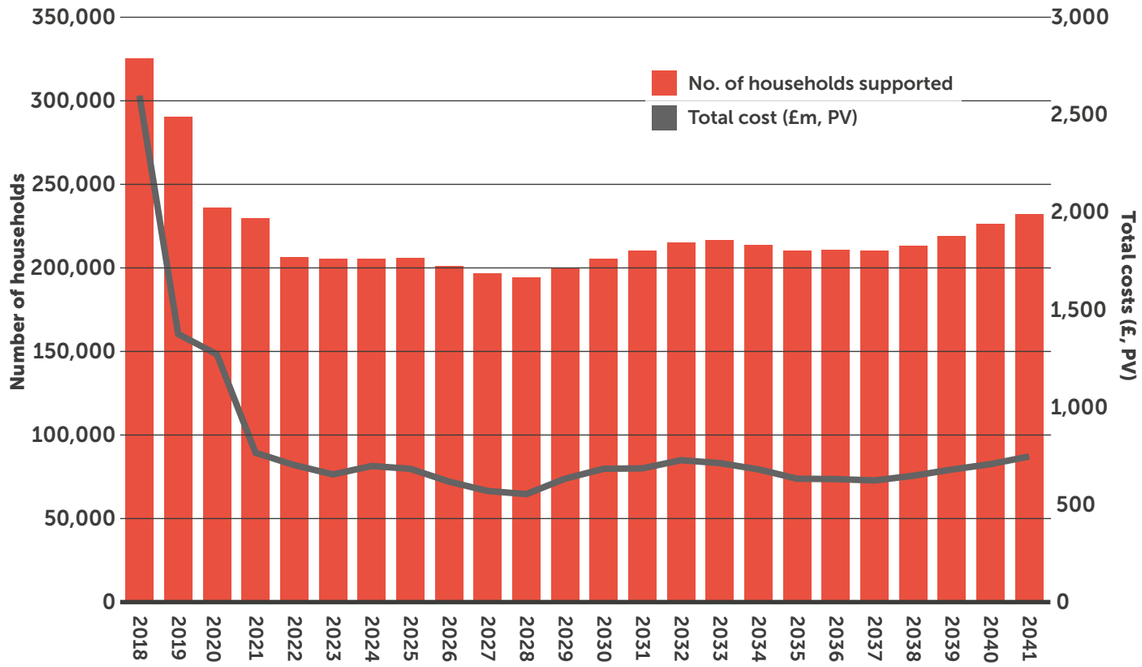


Figure 15.2: Number of households supported and estimated total cost of Crisis' plan to achieve Objectives 1-5 (PV, £m, 2017 prices)



Source: PwC 2018

Table 15.4: Ten year (2018–2027) costs of Crisis' reccommended solutions to achieve objectives 1–5 by region/nation (PV, £m, 2017 prices)

Region/nation	10 year cost (2018-2027)
Greater London +	£4,590
North	£1,535
Midlands	£958
South	£1,934
Wales	£305
Scotland	£615
Great Britain	£9,938

Source: PwC 2018

Table 15.5 Total benefits of Crisis' recommended solutions to achieve Objectives 1-5 by objective, region/nation (PV, £m, 2017 prices)

Region/ nation	Objective 1	Objective 2	Objective 3	Objective 4	Objective 5	Total
Greater London	£1,889	£10,702	£15,450	£89	£1,389	**£29,518**
North	£376	£3,646	£1,852	£75	£621	**£6,570**
Midlands	£215	£2,451	£1,426	£42	£423	**£4,557**
South	£513	£4,398	£2,900	£77	£924	**£8,811**
Wales	£60	£1,043	£240	£11	£118	**£1,472**
Scotland	£154	£1,455	£1,140	£23	£207	**£2,979**
Great Britain	£3,207	£23,694	£23,008	£318	£3,681	**£53,908**

Source: PwC 2018

Over 90 per cent of the costs are expected to be incurred in England, with Greater London accounting for more than half of these. Scotland accounts for five per cent of the cost and Wales three per cent. This reflects the number of households and people projected to be homeless (core and wider) in each region between 2018 and 2041.

More than half (£9,938m, or 52%) of the total discounted costs are expected to occur between 2018 and 2027 (see Figure 15.2 and Table 15.4). The solutions included in the PwC's analysis are assumed to support the cohort of households expected to be homeless in 2018. Over the following years, some of these households (those with more acute and complex needs) are expected to require continuing support from these solutions. In addition, new households are projected to be homeless and require support.

PwC's analysis also estimates that between 2018 and 2041 solutions included in the analysis will deliver discounted benefits of £53,908m at 2017 prices (see Table 15.5). Nearly half (£26,426m, or 49%) of the total discounted benefits are expected to occur between 2018 and 2027 (Table 15.6).

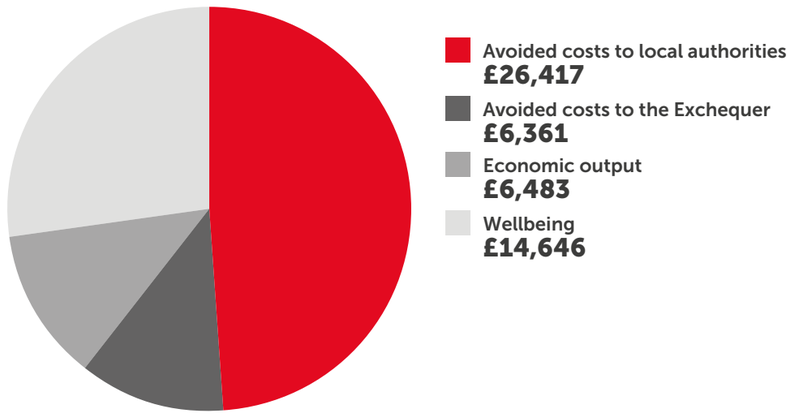
Figure 15.3 above shows that nearly half of the estimated benefits accrue to local authorities over the period 2018 to 2041. They save £26,417m through reduced or avoided use of homeless services (eg reduced need for spending on temporary accommodation and other housing and support based services for

Table 15.6: Ten year (2018–2027) benefits of Crisis' recommended solutions to achieve objectives 1–5 region/nation (PV, £m, 2017 prices)

Region/nation	10 year benefit (2018-2027)
Greater London +	£12,753
North	£3,543
Midlands	£2,537
South	£5,108
Wales	£815
Scotland	£1,670
Great Britain	£26,426

Source: PwC 2018

Figure 15.3 Estimated distribution of total benefits delivered through recommended solutions between 2018 and 2041 (Great Britain, PV, £m, 2017 prices)



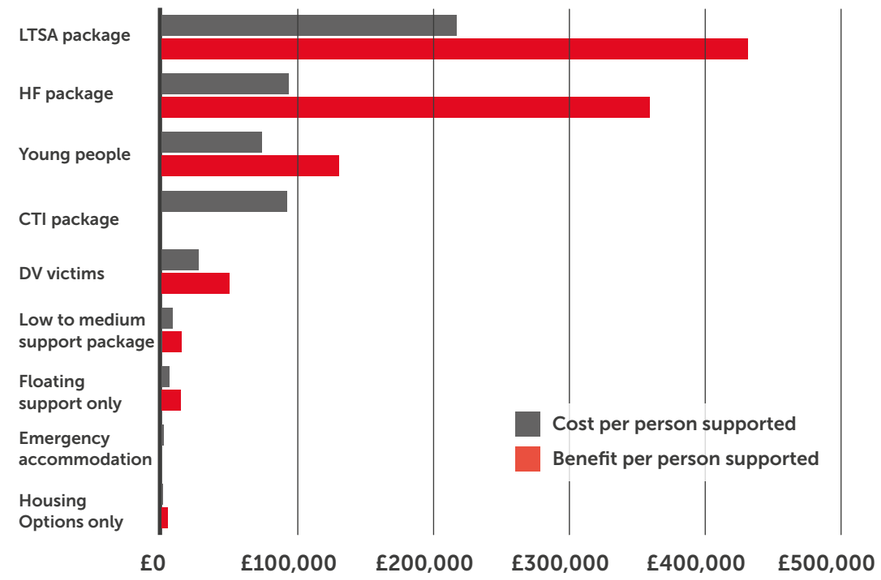
Source: PwC 2018

homeless people funded by local authorities). Improved wellbeing as a result of people obtaining secure housing accounts for 27 per cent of the projected benefits (£14,646m), while increased economic output as a result of people entering employment (an estimate of their increased earnings) accounts for 12 per cent (£6,483m) of the total estimated benefits.

Outside of local authority budgets, the Exchequer is projected to save around £6,361m (12%) through reduced use of public services such as NHS and criminal justice system services as previously homeless people are moved out of homelessness and, on average, are expected to use these services with a lower frequency. Increased tax and other contributions from people who enter employment also contribute to the savings estimated for the Exchequer. PwC's analysis also accounts for a potential increase in the number of Jobseekers Allowance claimants as people who previously were not claiming but were entitled to Job Seekers Allowance receive support and guidance in relation to the benefit system and begin claiming (a financial cost to the Exchequer).

Figure 15.4 shows the costs and benefits per person of our reccommended solutions to achieve our definition of ending homelessness. The long term supported accommodation solution,

Figure 15.4 Costs and benefit per person supported of the recommended solutions (PV, £, 2017 prices)



Source: PwC 2018

which is expected to support people in Objectives 1 to 3, is estimated to have the highest costs (£6,338m or 33% of the total costs). It is closely followed by the Housing First package, which also contributes around 33% (£6,225m). The low to medium support package (housing access and floating support) and the Critical Time Intervention packages contribute a further 12 per cent and 10 per cent respectively to total costs. These results are driven by the numbers of people expected to need each package and the cost per person of different types of support. More intensive long term supported accommodation and Housing First packages have higher costs but also greater benefits.

In summary, in present value terms, for every £1 that will be invested in the solutions recommended to achieve Objectives 1 to 5, it is estimated that £2.8 will be generated in benefits – this includes cashable savings and wellbeing value. This is an overall benefit-cost ratio of 2.8. The benefit-cost ratio varies by objective from 3.2 for Objective 1 (people who are rough sleeping) to 2.7 for Objective 5 (people who are at immediate risk of core homelessness).

More than half (£9,938m, or 52%) of the total discounted costs are expected to occur between 2018 and 2027 alongside nearly half (£26,426m, or 49%) of the total discounted benefits.

Chapter 16:

Conclusion

The purpose of this plan is to help politicians and governments make the decisions necessary to end homelessness. We have highlighted the best evidence available and the policy choices needed.

Homeless sector experts and decision makers' views of the plan will inevitably vary. We hope, however, that no one will consider ending homelessness too complicated to imagine or too difficult to achieve.

Many of the policy decisions that have impacted negatively on homelessness other the years, were not intended to do so. Yet, they have had lasting and serious consequences. Most obvious among them are housing, welfare and migration policies. Going forward we hope that a more positive agenda to prevent and end homelessness will be part of all political decision-making.

To ensure efforts to end homelessness are co-ordinated and impactful, political commitments must come from the highest level. The current approach across the three nations is fragmented. Renewed central government leadership across Great Britain is needed.

Crisis and others in our sector must also accept obligations. As service providers, we must follow the best evidence of, what works, and strive always to end people's homelessness for good. As communicators, we must change the story that we tell the public. And as campaigners, we must focus on solutions; helping politicians to make the right choices.

This plan is written in good faith as a tool for all those interested in tackling homelessness, and created in the certain knowledge that together we can end it.

Appendix 1:

Priorities for the Westminster, Scottish and Welsh Governments

Homelessness is devastating, but is by no means inevitable. This plan explains the government actions needed to end homelessness in Great Britain.

In the short term, we need political will and aspiration across the Westminster, Scottish and Welsh Governments to go above and beyond current thinking. There are a good number of positive policy initiatives in each nation, but we want all governments to be even more aspirational and commit to ending homelessness.

To achieve this, each government will need to think strategically. They must work with colleagues across all relevant government departments and at local and national levels. They must think beyond just rough sleeping.

Some political reforms can be adopted immediately; others will take longer. And to sustain the progress, a commitment to end homelessness must be both cross political and span electoral cycles. This means future governments adhere to a consistent mandate committing to successfully implementing or refining these polices. Therefore, long-term and cross-party political commitments are critical in stopping any progress being eroded or disregarded by future governments.

There are policies within this plan that should be an immediate priority for current governments; others require significant culture change, considered planning, and initial government investment.

In the table overleaf we have defined 'immediate' as actions that can be taken straight away – either through legislation, funding or policy change. If recommendations need longer-term political commitment regarding funding, or if a consultation or review is needed, we have identified these as longer-term policy changes.

If this plan is implemented in full, homelessness can be ended within ten years, but only if the harder, more substantial reforms begin when implementation starts.

The time is right for an all-encompassing domestic policy agenda to end homelessness in Britain for good. We call on all three governments to use this plan to take bold, forward thinking actions that make this ambition a reality.

Westminster Government	Department	Nation	Immediate/ longer-term
Commit to ending homelessness for good, and produce an action plan that will get everybody who is homeless into a safe and stable home within 10 years.			
Prevention			
Sufficiently fund the homelessness prevention duty. Allocations to local authorities should be set out on a long-term and stable basis. Where necessary, other agencies responsible for prevention activity should have access to additional funds.	MHCLG and HM Treasury	England	Immediate
Set out in secondary legislation a mandated set of activities that local authorities should have available to them to help prevent and relieve homelessness. This should include: • enhanced housing advice • private renting access schemes • family mediation • domestic abuse victim support • prison, hospital and other institution discharge arrangements • tenancy sustainment support • housing association protocols.	MHCLG	England	Immediate
Place a duty on all relevant public bodies to prevent homelessness and to cooperate with local housing authorities in relieving homelessness.	MHCLG	England	Immediate
Ensure that Critical Time Interventions form a key part of national strategies to prevent and end homelessness for groups most at risk, and that sufficient funding is made available to take this to scale.	MHCLG and other relevant central government departments	England	Immediate
Rapid Rehousing			
Introduce a new duty for the publication and review of homelessness strategies. Each strategy must contain key performance targets for delivering affordable permanent housing linked to the numbers of people experiencing homelessness, as well as the support required to help people maintain their tenancy and address support needs. Annual reports on progress against key performance targets should be submitted by local authorities to national government and these reports should be made publicly available.	MHCLG	England	Immediate
Protect the long term funding mechanism for emergency accommodation.	DWP	England, Scotland and Wales	Immediate
Ensure the design of the Universal Credit system is flexible and responsive enough to account for supported housing costs.	DWP	England, Scotland and Wales	Immediate
Introduce strict time limits on the use of unsuitable temporary accommodation of no more than seven days.	MHCLG	England	Longer-term
Rough Sleeping			
Introduce a duty to provide immediate emergency accommodation to all those with nowhere safe to stay until priority need is abolished.	MHCLG	England	Immediate
Provide additional funding to local authorities to scale up the No First Night Out approach across England to prevent people rough sleeping.	MHCLG	England	Immediate
Increase funding to scale up an assertive outreach model across England to deliver a more robust and personalised form of support to all rough sleepers that focuses on moving them into permanent accommodation.	MHCLG	England	Immediate
Provide personal budgets for rough sleepers that require high levels of support.	MHCLG	England	Immediate
Increase investment in StreetLink and use learnings from its recent evaluation to promote better use of the service.	MHCLG and GLA	England	Immediate
Introduce a national reconnections framework and collect and publish data on long term outcomes for rough sleepers that are reconnected in England.	MHCLG	England	Immediate
Abolish local connection criteria for rough sleepers, and ensure it no longer presents a barrier to assistance for anyone threatened with or experiencing homelessness.	MHCLG	England	Immediate
Abolish *The Vagrancy Act (1824).*	MHCLG	England and Wales	Immediate
Where a person has died whilst homeless and living on the streets, ensure that a safeguarding review takes place.	Department of Health and Social Care (DHSC)	England	Immediate
Welfare			
Return Local Housing Allowance rates to the 30th percentile of market rents.	DWP	England, Scotland and Wales	Immediate
Further improve the accuracy of Local Housing Allowance rates by using annual data from a national register on the size (number of bedrooms) of private landlords' rental property, and the level of rent they are charging.	DWP	England, Scotland and Wales	Immediate

Westminster Government	Department	Nation	Immediate/ longer-term
Change the way Local Housing Allowance is uprated to match average projected rent increases.	MHCLG and DWP	England, Scotland and Wales	Immediate
Exempt the following groups of homeless people and those at risk of homelessness from the Shared Accommodation Rate: people made a Housing First offer; care leavers; people fleeing domestic abuse; prison leavers moving on from 'Approved Premises'; and people with experience of homelessness with alcohol and drug dependency issues.	DWP	England, Scotland and Wales	Immediate
Reduce errors and delays in processing Universal Credit by increasing staff capacity and training to match demand in service centres and on the Universal Credit helpline.	DWP	England, Scotland and Wales	Immediate
Ensure homeless people have access to the equivalent financial support that an advance payment would provide, without having to pay it back.	DWP	England, Scotland and Wales	Immediate
Grant a three-month delay on any Universal Credit deductions for anyone identified as homeless or at risk of homelessness. And set deductions at an affordable level that does not create a risk of homelessness.	DWP	England, Scotland and Wales	Immediate
Introduce greater flexibility to lift the benefit cap in specified circumstances related to homelessness.	DWP	England, Scotland and Wales	Immediate
Establish a network of housing and homelessness leads in Jobcentre Plus to integrate housing and employment support.	DWP	England, Scotland and Wales	Immediate
Incorporate homelessness and housing need into the Jobcentre Plus work coach assessment framework.	DWP	England, Scotland and Wales	Immediate
Include the impact of homelessness on work capability in the alternative criteria guidance for the Work Capability Assessment.	DWP	England, Scotland and Wales	Immediate
Reform the conditionality and sanctions regime to ensure it does not cause homelessness.	DWP	England, Scotland and Wales	Immediate
Migrant Homelessness			
Reverse the right to rent policy.	Home Office	England	Immediate
Reverse the extended NHS regulations that have increased the types of secondary healthcare that some migrants must pay for, as well as having introduced up-front charging.	Department of Health and Social Care	England	Immediate
Issue new guidance to banks regarding the documentation that they must accept as sufficient proof to allow someone to open an account.	Financial Conduct Authority	England, Scotland and Wales	Immediate
Collect and make publicly available relevant data to measure the impact of Home Office policies on homelessness.	Home Office	England, Scotland and Wales	Immediate
Make immigration detention centres subject to a statutory duty to refer people who are at risk of homelessness on release to the local housing authority.	Home Office and MHCLG	England	Immediate
Ensure that immigration detainees, who would otherwise be homeless on release, are given access to emergency accommodation.	Home Office	England, Scotland and Wales	Immediate
Ensure that a properly supported voluntary reconnection service is provided for migrants who are homeless or at risk of homelessness and who want to explore the option of returning to their country of origin.	MHCLG	England	Immediate
Reinstate entitlement to Housing Benefit for EEA nationals with jobseeker status.	DWP and HM Treasury	England, Scotland and Wales	Immediate
Make all EEA nationals with a right to reside eligible for statutory homelessness assistance.	MHCLG	England	Immediate
Ensure EEA nationals who are eligible for statutory homelessness assistance have a limited entitlement to benefits for six months.	DWP and HM Treasury	England, Scotland and Wales	Immediate
Provide national guidance for every local authority and public agency who might assist EEA nationals, to make clear the links between the right to reside, entitlement to benefits and eligibility for homelessness assistance.	Home Office with the input of relevant departments, and the Scottish and Welsh Governments	England, Scotland and Wales	Immediate
Ensure that an assertive outreach model, with an emphasis on access to legal, benefits and employment support, is delivered to meet the needs of rough sleeping EEA nationals.	MHCLG	England	Immediate
Address the high level of incorrect decisions currently being made on applications for asylum support by improving quality assurance and giving immigration case workers sufficient training and capacity.	Home Office	England, Scotland and Wales	Immediate
Extend the move-on period for newly recognised refugees to at least 56 days.	Home Office	England, Scotland and Wales	Immediate
Ensure support is available to help newly recognised refugees navigate the move-on period and access housing, education, employment and welfare benefits.	Home Office	England, Scotland and Wales	Immediate

Westminster Government	Department	Nation	Immediate/ longer-term
Make the providers of asylum support accommodation subject to a statutory duty to refer people who are leaving asylum accommodation, and are at risk of homelessness, to the local housing authority.	Home Office and MHCLG	England, Scotland and Wales	Immediate
Ensure that short-term emergency accommodation is provided for migrants who are homeless, or at imminent risk of becoming homeless. This must be provided alongside access to immigration advice.	MHCLG	England	Immediate
Issue guidance for local authorities setting out the duties they owe to migrant households with no recourse to public funds.	MHCLG	England	Immediate
At a minimum, ensure that all migrants at risk of becoming homeless within 56 days are eligible for support under the statutory duty to prevent homelessness.	MHCLG	England	Immediate
Consider how best to grant access to the statutory homelessness system for all migrants.	MHCLG	England	Longer-term
Housing First			
Make Housing First the default option for anyone with complex needs who is experiencing homelessness.	MHCLG	England	Immediate
Appoint a national director for Housing First.	MHCLG	England	Immediate
Oversee the establishment of national and local targets for the delivery of Housing First tenancies.	MHCLG	England	Immediate
Collect and publish data on the fidelity and outcomes of Housing First projects.	MHCLG with the input of relevant departments	England	Immediate
Exempt Housing First participants from the Shared Accommodation Rate, the benefit cap and welfare conditionality and sanctioning.	DWP	England, Scotland and Wales	Immediate
Homelessness Legislation			
Ensure housing associations give 'reasonable preference' to homeless households in their allocations policies.	MHCLG	England	Immediate
Introduce a funded programme of professional support and training for local housing authority staff.	MHCLG	England	Immediate
Place a duty on local authorities to provide the housing support that has been identified as needed via a personalised housing plan.	MHCLG	England	Immediate
Ensure that there is robust but proportionate regulation, monitoring and inspection of how local authorities, public bodies and social housing providers discharge their homelessness duties.	MHCLG	England	Longer-term
Ensure there is a more open system of individual reviews and appeals and access to free or means-tested legal advice.	MHCLG	England	Longer-term
Ensure that appropriate provisions are made for households who remain homeless after exhausting their entitlements under the homelessness statutory framework.	MHCLG	England	Longer-term
Abolish intentionality in its current form and introduce a new test focusing on deliberate manipulation of the homelessness system.	MHCLG	England	Longer-term
Abolish the priority need criteria.	MHCLG	England	Longer-term
Housing Solutions			
Set a national target for delivering 90,000 homes a year at social rent levels and grow investment to meet this target over a 15-year period.	MHCLG	England	Immediate
Increase the share of government housing investment to meet the target for social rented housing through new build, acquisition and the conversion of empty/obsolete buildings.	MHCLG	England	Immediate
Ensure that all developing housing associations provide a proportion of new homes at rents that homeless and other low income households can afford to occupy.	MHCLG	England	Immediate
Prevent further erosion of the social rented housing stock by ending the policy of requiring housing associations to convert social rent homes to affordable rent.	MHCLG	England	Immediate
Suspend the right to buy policy until the Westminster Government puts in place a programme of investment and wider changes to reverse the decline in the supply of homes at social rents.	MHCLG	England	Immediate
Extend flexibility on local authority housing revenue account borrowing to increase the delivery of homes for social rent.	MHCLG	England	Immediate
Ensure that the rent setting framework for social housing delivers rents that are affordable to those on low earnings and in receipt of Housing Benefit.	MHCLG	England	Immediate
Create a definition of affordable housing that relates housing costs to households' ability to pay, and meets the needs of low income groups.	MHCLG	England	Immediate
Revise national allocations guidance to ensure homeless people are not excluded for registering from social housing.	MHCLG	England	Immediate

Westminster Government	Department	Nation	Immediate/ longer-term
Create a regulatory requirement that all registered providers of mainstream social housing set an annual guideline target for the minimum proportion of social lettings to homeless nominees and report on this publicly.	MHCLG	England	Immediate
Ensure all social housing providers fulfil their responsibilities to cooperate with the local authorities in meeting their homelessness duties and are encouraged to adopt best practice in supporting homeless people into social housing, including best practice in the use of pre-tenancy assessments.	MHCLG	England	Immediate
Ensure local authorities and social housing providers monitor and report publicly on their performance of providing settled homes for homeless people.	MHCLG	England	Immediate
Amend the Regulator of Social Housing's regulatory objectives to include safeguarding and promoting the interests of homeless people, as well as current and future tenants (mirroring the objectives of the Scottish Housing Regulator).	MHCLG	England	Immediate
Require every private sector landlord to ensure any home they rent is fit for human habitation at the start of and throughout the tenancy.	MHCLG	England	Immediate
Place a statutory duty on local authorities to provide a tenancy relations service.	MHCLG	England	Immediate
Introduce a national register that all private landlords and lettings agencies are required to join, and require private landlords and lettings agencies to submit annual data on the size (number of bedrooms) of their rental property and the level of rent they are charging.	MHCLG	England	Immediate
Make it easier for local authorities to introduce selective licensing schemes by removing unnecessary financial and bureaucratic barriers.	MHCLG	England	Immediate
Introduce national provision of private rented access schemes (help to rent) across England, including a national rent deposit guarantee scheme.	MHCLG	England	Immediate
Introduce a new standard private rented tenancy, with no fixed term period, where the landlord can only give notice by using specified grounds, and with limits on annual rent increases linked to an inflationary measure.	MHCLG	England	Longer-term
Ensure that build to rent developments play a part in meeting the needs of people moving on from homelessness by revising the definition of affordable private rent housing (at 80% market rents) to encourage provision targeted at households on median earnings in the ward where schemes are located – mirroring the London Living Rent.	MHCLG	England	Immediate
Require local authorities to ensure that the permanent mainstream housing needs of homeless people are taken into account through Strategic Housing Market Assessments, and specifically include mapping provision to meet the needs of low income single adults.	MHCLG	England	Immediate
Update national planning guidance to ensure it expressly addresses the need for new housing provision for single homeless adults, taking account of the availability of shared and one-bedroom supply in the existing housing stock.	MHCLG	England	Immediate
Task Homes England with inviting bids piloting build to rent schemes that test the viability of including a proportion of homes for local authority nominees on low incomes and people moving on from homelessness.	MHCLG	England	Longer-term
Data			
Redesign statutory homelessness data collection so that it follows individuals through their journey within the homelessness system.	MHCLG	England	Immediate
Introduce a new CHAIN-like system for recording rough sleeping that allows data sharing between the agencies working with people who are rough sleeping or at risk of rough sleeping. The system should also be linked to statutory homelessness data and people living in all forms of emergency accommodation.	MHCLG	England	Immediate
Establish data linkage systems that include data sets across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services.	MHCLG and other relevant central government departments	England	Immediate
Commission the Centre for Homelessness Impact to fill gaps in evidence on homelessness prevention, rapid rehousing approaches, as well as solutions for certain homelessness groups.	MHCLG	England	Immediate
Adopt a homelessness outcomes framework.	MHCLG	England	Immediate

Scottish Government	Department	Immediate/ longer-term
Commit to ending homelessness for good, and produce an action plan that will get everybody who is homeless into a safe and stable home within 10 years.		
Prevention		
Introduce a statutory duty to prevent homelessness for all households who are at risk of becoming homeless within 56 days, regardless of priority status, local connection, intentionality or migration status.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Sufficiently fund a homelessness prevention duty. Allocations to local authorities should be set out on a long-term and stable basis. Where necessary, other agencies responsible for prevention action should have access to additional funds.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Set out in secondary legislation a mandated set of activities that local authorities should have available to them to help prevent and relieve homelessness. This should include: • enhanced housing advice • private renting access schemes • family mediation • domestic abuse victim support • prison, hospital and other institution discharge arrangements • tenancy sustainment support • housing association protocols.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Place a duty on all relevant public bodies to prevent homelessness and to cooperate with local housing authorities in relieving homelessness.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Ensure that Critical Time Interventions form a key part of national strategies to prevent and end homelessness for groups most at risk, and that sufficient funding is made available to take this to scale.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Rapid rehousing		
Introduce strict statutory time limits on the use of unsuitable temporary accommodation of no more than seven days. This should apply to all homeless households.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Introduce a new duty for the publication and review of homelessness strategies. Each strategy must contain key performance targets for delivering affordable permanent housing linked to the numbers of people experiencing homelessness, as well as the support required to help people maintain their tenancy and address support needs. Annual reports on progress against key performance targets should be submitted by local authorities to national governments and these reports should be made publically available.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Rough Sleeping		
Increase funding to scale up an assertive outreach model across Scotland to deliver a more robust and personalised form of support to all rough sleepers that focuses on moving them into permanent accommodation.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Provide personal budgets for rough sleepers that require high levels of support.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Consider whether to extend the StreetLink service to Scotland.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Introduce a national reconnections framework and collect and publish data on long term outcomes for rough sleepers that are reconnected across Scotland.	Scottish Government (Housing and Social Justice Directorate) and local authorities	Immediate
Abolish local connection criteria for rough sleepers, and ensure it no longer presents a barrier to assistance for anyone threatened with or experiencing homelessness.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Where a person has died whilst homeless and living on the streets, ensure that a safeguarding review takes place.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Migrant homelessness		
Ensure that a properly supported voluntary reconnection service is provided for migrants who are homeless or at risk of homelessness and who want to explore the option of returning to their country of origin.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Ensure that an assertive outreach model with an emphasis on access to legal, benefits and employment support is delivered to meet the needs of rough sleeping EEA nationals.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Ensure that short-term emergency accommodation is provided for migrants who are homeless, or at imminent risk of becoming homeless. This must be provided alongside access to immigration advice.	Scottish Government (Housing and Social Justice Directorate)	Immediate

Scottish Government	Department	Immediate/ longer-term
Issue guidance for local authorities clearly setting out the duties they owe to migrant households with no recourse to public funds.	Scottish Government (Housing and Social Justice Directorate)	Immediate
At a minimum, ensure that all migrants at risk of becoming homeless within 56 days, are eligible for support under a statutory duty to prevent homelessness.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Housing First		
Make Housing First the default option for anyone with complex needs who is experiencing homelessness.	Scottish Government (Housing and Social Justice Directorate with the input of other relevant directorates)	Immediate
Appoint a national director for Housing First.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Oversee the establishment of national and local targets for the delivery of Housing First tenancies.	Scottish Government (Housing and Social Justice Directorate with the input of other relevant directorates)	Immediate
Collect and publish data on the fidelity and outcomes of Housing First projects.	Scottish Government (Housing and Social Justice Directorate with the input of other relevant directorates)	Immediate
Legislation		
Introduce a funded programme of professional support and training for local authority housing staff.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Ensure that appropriate provisions are made for households who remain homeless after exhausting their entitlements under the homelessness statutory framework.	Scottish Government (Housing and Social Justice Directorate)	Longer-term
Abolish intentionality in its current form and introduce a new test focusing on deliberate manipulation of the homelessness system.	Scottish Government (Housing and Social Justice Directorate), Scottish Housing Regulator	Longer-term
Ensure there is a more open system of individual reviews and appeals.	Scottish Government (Housing and Social Justice Directorate)	Longer-term
Ensure that the regulation, monitoring, and inspection of how local authorities, other public bodies, and social housing providers discharge their homelessness duties is fit for purpose.	Scottish Government (Housing and Social Justice Directorate with the input of other relevant directorates)	Longer-term
Housing solutions		
Maintain investment to deliver the equivalent of 5,500 homes a year at social rent levels over a 15-year period, and ensure funding is targeted effectively to meet needs identified at local housing market level.	Scottish Government (Housing and Social Justice Directorate)	Longer-term

Scottish Government	Department	Immediate/ longer-term
Ensure that the rent setting framework for social housing delivers rents that are affordable to those on low earnings and in receipt of Housing Benefit.	Scottish Government (Housing and Social Justice Directorate), Scottish Housing Regulator	Immediate
Create a regulatory requirement that all registered providers of mainstream social housing set an annual guideline target for the minimum proportion of social lettings to homeless nominees and report on this publicly.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Ensure all social housing providers fulfil their responsibilities to co-operate with local authorities in meeting their homelessness duties, and are encouraged to adopt best practice in supporting homeless people into social housing – including best practice in the use of pre-tenancy assessments.	Scottish Government (Housing and Social Justice Directorate), Scottish Housing Regulator	Immediate
Ensure local authorities and housing providers monitor and report publicly on their performance providing settled homes for homeless people.	Scottish Government (Housing and Social Justice Directorate), Scottish Housing Regulator	Immediate
Place a statutory duty on local authorities to provide tenancy relations service.	Scottish Government (Housing and Social Justice Directorate)	Immediate
As part of the Scottish Landlord Register, require all private landlords and lettings agencies to submit annual data on the size (number of bedrooms) of their rental property and the level of rent they are charging.	Scottish Government (Housing and Social Justice Directorate)	Immediate
All new tenancies should include clauses that limit annual rent increases to a maximum of an inflationary measure.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Review provision of private rented access schemes in Scotland and learning from programmes across Great Britain to consider the case for creating national provision of help to rent schemes for Scotland and national funding for deposit guarantee schemes.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Update national planning guidance to ensure it expressly addresses the need for new housing provision for single homeless adults, taking account of the availability of shared and one-bedroom supply in the existing housing stock.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Require local authorities to ensure that the permanent mainstream housing needs of homeless people are taken into account through Housing Need and Demand Assessments and specifically include mapping provision to meet the needs of low income single adults.	Scottish Government (Housing and Social Justice Directorate)	Immediate

Scottish Government	Department	Immediate/ longer-term
Data		
Introduce a new CHAIN-like system for recording rough sleeping that allows data sharing between the agencies working with people who are rough sleeping or at risk of rough sleeping. The system should also be linked to statutory homelessness data and people living in all forms of emergency accommodation.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Establish data linkage systems that include data sets across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Commission the Centre for Homelessness Impact to fill gaps in evidence on homelessness prevention, rapid rehousing approaches, as well as solutions for certain homelessness groups.	Scottish Government (Housing and Social Justice Directorate)	Immediate
Adopt a homelessness outcomes framework.	Scottish Government (Housing and Social Justice Directorate)	Immediate

Welsh Government	Department	Immediate/ longer-term
Commit to ending homelessness for good, and produce an action plan that will get everybody who is homeless into a safe and stable home within 10 years.		
Prevention		
Ring fence the Supporting People fund and guarantee beyond the current one-year budget allocation	Local Government and Public Services and Finance	Immediate
Ensure that Critical Time Interventions form a key part of national strategies to prevent and end homelessness for groups most at risk, and that sufficient funding is made available to take this to scale.	Housing and Regeneration (Local Government and Public Services) and other relevant government departments	Immediate
Sufficiently fund the homelessness prevention duty. Allocations to the local authorities should be set out on a long-term local basis. Where necessary, other agencies responsible for prevention activity should have access to additional funds.	Housing and Regeneration (Local Government and Public Services)	Immediate
Place a duty on all relevant public bodies to prevent homelessness and to cooperate with local housing authorities in relieving homelessness.	Housing and Regeneration (Local Government and Public Services)	Immediate
Rapid Rehousing		
Introduce strict time limits on the use of temporary accommodation of no more than seven days. This should apply to all homeless households.	Housing and Regeneration (Local Government and Public Services)	Longer-term
Introduce a new duty for the publication and review homelessness strategies. Each strategy must contain key performance targets for delivering affordable permanent housing linked to the numbers of people experiencing homelessness, as well as the support required to help people maintain their tenancy and address support needs. Annual reports on progress against key performance targets should be submitted by local authorities to national governments and these reports should be made publicly available.	Housing and Regeneration (Local Government and Public Services)	Immediate
Rough sleeping		
Introduce a duty to provide immediate emergency accommodation to all those with nowhere safe to stay until priority need is abolished.	Housing and Regeneration (Local Government and Public Services)	Immediate
Provide additional funding for local authorities to introduce the No First Night Out approach across Wales to prevent people rough sleeping.	Housing and Regeneration (Local Government and Public Services)	Immediate

Welsh Government	Department	Immediate/ longer-term
Increase funding to scale up an assertive outreach model across Wales to deliver a more robust and personalised form of support to all rough sleepers, focusing on moving them into permanent accommodation.	Housing and Regeneration (Local Government and Public Services)	Immediate
Provide personal budgets for rough sleepers that require high levels of support.	Housing and Regeneration (Local Government and Public Services)	Immediate
Increase investment in StreetLink and use learnings from its recent evaluation to promote better use of the service.	Housing and Regeneration (Local Government and Public Services)	Immediate
Introduce a national reconnections framework and collect and publish data on long term outcomes for rough sleepers that are reconnected across Wales.	Housing and Regeneration (Local Government and Public Services)	Immediate
Abolish local connection criteria for rough sleepers and ensure it no longer presents a barrier to assistance for anyone threatend with or experiencing homelessness.	Housing and Regeneration (Local Government and Public Services)	Immediate
Where a person has died whilst homeless and living on the streets, ensure that a safeguarding review takes place.	Health and Social Services	Immediate
Migrant homelessness		
Ensure that a properly supported voluntary reconnection service is provided for migrants who are homeless or at risk of homelessness and who want to explore the option of returning to their country of origin.	Housing and Regeneration (Local Government and Public Services)	Immediate
Make all EEA nationals with a right to reside eligible for statutory homelessness assistance.	Housing and Regeneration (Local Government and Public Services)	Immediate
Ensure that an assertive outreach model with an emphasis on access to legal, benefits and employment support is delivered to meet the needs of rough sleeping EEA nationals.	Housing and Regeneration (Local Government and Public Services)	Immediate
Ensure that short-term emergency accommodation is provided for migrants who are homeless, or at imminent risk of becoming homeless. This must be provided alongside access to immigration advice.	Housing and Regeneration (Local Government and Public Services)	Immediate
Issue guidance for local authorities clearly setting out the duties they owe to migrant households with no recourse to public funds.	Housing and Regeneration (Local Government and Public Services)	Immediate
At a minimum, ensure that all migrants at risk of becoming homeless within 56 days are eligible for support under the statutory duty to prevent homelessness.	Housing and Regeneration (Local Government and Public Services)	Immediate

Welsh Government	Department	Immediate/ longer-term
Consider how best to grant access to the statutory homelessness system for all migrants.	Housing and Regeneration (Local Government and Public Services)	Longer-term
Housing First		
Make Housing First the default option for anyone with complex needs who is experiencing homelessness.	Housing and Regeneration (Local Government and Public Services)	Immediate
Appoint a national director for Housing First.	Housing and Regeneration (Local Government and Public Services)	Immediate
Oversee the establishment of national and local targets for the delivery of Housing First tenancies.	Housing and Regeneration (Local Government and Public Services)	Immediate
Collect and publish data on the fidelity and outcomes of Housing First projects.	Housing and Regeneration (Local Government and Public Services)	Immediate
Homelessness legislation		
Place a duty on local authorities to provide the housing support that has been identified as needed via a personalised housing plan.	Housing and Regeneration (Local Government and Public Services)	Immediate
Ensure housing associations give 'reasonable preference' to homeless households in their allocation policies.	Housing and Regeneration (Local Government and Public Services)	Immediate
Abolish intentionality in its current form and introduce a new test focusing on deliberate manipulation of the homelessness system.	Housing and Regeneration (Local Government and Public Services)	Immediate
Continue and improve the professional support and training programme for frontline homelessness officers.	Housing and Regeneration (Local Government and Public Services)	Immediate
Abolish the priority need criteria.	Housing and Regeneration (Local Government and Public Services)	Longer-term
Ensure there is robust but proportionate regulation, monitoring and inspection of how local authorities, public bodies and social housing providers discharge their homelessness duties.	Housing and Regeneration (Local Government and Public Services)	Longer-term
Ensure there is a more open system of individual reviews and appeals, and access to free or means tested legal advice.	Housing and Regeneration (Local Government and Public Services)	Longer-term
Ensure that appropriate provisions are made for households who remain homeless after exhausting their entitlements under the homelessness statutory framework.	Housing and Regeneration (Local Government and Public Services)	Longer-term
Housing		
Increase the annual target for the delivery of new social rent homes to 4,000 a year, and continue to grow investment in social rented housing to deliver the equivalent of 4,000 homes a year, over a 15-year period.	Housing and Regeneration (Local Government and Public Services)	Immediate

Welsh Government	Department	Immediate/ longer-term
Ensure that the rent setting framework for social housing delivers rents that are affordable to those on low earnings and in receipt of Housing Benefit.	Housing and Regeneration (Local Government and Public Services)	Immediate
Create a regulatory requirement that all registered providers of mainstream social housing set an annual guideline target for the minimum proportion of social lettings to homeless nominees and report on this publicly.	Housing and Regeneration (Local Government and Public Services)	Immediate
Ensure all social housing providers fulfil their responsibilities to co-operate with local authorities in meeting their homelessness duties and are encouraged to adopt best practice in supporting homeless people into social housing – including best practice in the use of pre-tenancy assessments.	Housing and Regeneration (Local Government and Public Services)	Immediate
Ensure local authorities and housing providers monitor and report publicly on their performance of providing settled homes for homeless people.	Housing and Regeneration (Local Government and Public Services)	Immediate
Amend the Welsh Government's regulatory objectives to include safeguarding and promoting the interests of homeless people as well as current and future tenants (mirroring the objectives of the Scottish Housing Regulator).	Housing and Regeneration (Local Government and Public Services)	Immediate
Place a statutory duty on local authorities to provide a tenancy relations service.	Housing and Regeneration (Local Government and Public Services)	Immediate
As part of Rent Smart Wales, require all private landlords and lettings agencies to submit annual data on the size (number of bedrooms) of their rental property and the level of rent they are charging.	Housing and Regeneration (Local Government and Public Services)	Immediate
Introduce a new standard private rented tenancy with no fixed term period where the landlord could only give notice by using specified grounds, and with limits on annual rent increases linked to an inflationary measure.	Housing and Regeneration (Local Government and Public Services)	Longer-term
Review provision of private rented access schemes in Wales and learning from programmes across Great Britain to consider the case for creating national scheme provision for Wales. This should include a national rent deposit guarantee scheme to help increase access to the private rented sector.	Housing and Regeneration (Local Government and Public Services)	Longer-term
Update national planning guidance to ensure it expressly addresses the need for new housing provision for single homeless adults, taking account of the availability of shared and one-bedroom supply in the existing housing stock.	Housing and Regeneration (Local Government and Public Services)	Immediate
Local Housing Market Assessments should map existing provision for low income single adults and address the needs of single adults across the spectrum of support needs.	Housing and Regeneration (Local Government and Public Services)	Immediate
Require local authorities to ensure that the permanent mainstream housing needs of homeless people are taken into account through Local Housing Market Assessments.	Housing and Regeneration (Local Government and Public Services)	Immediate
Data		
Redesign statutory homelessness data collection so that it follows individuals through their journey within the homelessness system.	Housing and Regeneration (Local Government and Public Services)	Immediate
Introduce a new CHAIN-style system for recording rough sleeping that allows data sharing between the agencies working with people who are rough sleeping or at risk of rough sleeping. The system should also be linked to statutory homelessness data and people living in all forms of emergency accommodation.	Housing and Regeneration (Local Government and Public Services)	Immediate
Establish data linkage systems that include data sets across health, homelessness, housing, criminal justice, substance misuse, welfare benefits, immigration and employment services.	Housing and Regeneration (Local Government and Public Services)	Immediate
Commission the Centre for Homelessness Impact to fill gaps in evidence on homelessness prevention, as well as solutions for certain homelessness groups.	Housing and Regeneration (Local Government and Public Services)	Immediate
Adopt a homelessness outcomes framework.	Housing and Regeneration (Local Government and Public Services)	Immediate

Appendix 2:

A housing association commitment to end homelessness

The right type of housing is vital if we are to end homelessness. However, supply will not provide the solution if homeless people are unable to access or keep hold of their homes.

We have been working with a group of housing associations, Homes for Cathy, to develop this housing association commitment to end homelessness.

Homes for Cathy

Homes for Cathy is a group of housing associations, mostly formed in the Cathy Come Home era. They united as a partnership in 2016 to mark the 50th anniversary of Cathy Come Home and to highlight the continuing needs of homeless people.

The group is committed to:

- continue lobbying for solutions that make a difference in the lives of homeless people and people at risk of homelessness
- share good practice that helps prevent homelessness and finds secure homes for people who are homeless.

It was clear from the consultation we undertook for the plan that housing associations are critical in ending homelessness. However, we also received feedback that responses to preventing and relieving homelessness were inconsistent across the housing association sector. This proposed commitment addresses these inconsistencies by encouraging all housing associations to commit to a series of actions.

Housing associations need to work in partnership to achieve these ambitions. That also requires local authorities to actively engage with their local housing associations, and share the aims of this commitment.

The commitment

Commitment 1 – to contribute to the development and execution of local authority homelessness strategies.

A recent survey[1] from the National Housing Federation found that 77 per cent of English housing associations had some form of engagement with local authority homelessness strategies. However, fewer than 20 per cent confirmed that they regularly engaged with them.

Most reported they had occasional engagement; one in five housing associations who did not engage on strategies felt that it was important to do so.

Research by the University of Sheffield and the Chartered Institute of Housing (CIH) found that while 88 per cent of councils say housing associations are involved in strategy development, only 35 per cent of housing associations say they are very involved.[2] Fifty-three per cent said they were a 'little' involved.

The CIH recommends that local authorities should co-produce homelessness strategies that spell out the roles and responsibilities of different local partners, including housing associations and voluntary sector agencies, in helping to reduce homelessness in their areas.[3]

In the consultation undertaken to inform this plan, it was clear that both housing associations and local authorities throughout Great Britain could do more to involve each other regarding homelessness strategies.[4] The proposals in Chapter 7 'Rapid rehousing', calling for more regular strategy updates, more local

1 National Housing Federation (2018) *Presentation*, Northern Housing Consortium and Crisis Consultation Event, 19th April, Call Lane Training Suite, Leeds.
2 Greaves, F. (2017) *Tackling homeless together. The importance of local authorities and housing associations working in partnership.* Sheffield: University of Sheffield.
3 Greaves, F. (2017) *Tackling homeless together. The importance of local authorities and housing associations working in partnership.* Sheffield: University of Sheffield.
4 Hughes, N. (2018) *Have your say policy consultation: summary report.* London: Crisis.

partnership commitment and more tangible and specific rehousing targets, create an opportunity for real engagement.

By using homelessness strategies to foster joint working, housing associations should demonstrate their commitment to meeting the housing need identified by the local authority.

Housing associations should jointly determine the overall number and type of properties needed to provide a Housing First and/or housing-led solution to end local homelessness. Each housing association should then determine what they can provide, as a proportion of the overall number needed. This proportion should be based on the amount of relevant properties they have in the local authority area.

Housing associations should also be part of local authorities' strategic planning in meeting the need for emergency accommodation. Emergency accommodation should be of a decent quality, but act as a short-term solution before leading to rapid rehousing. Housing associations should work with their local authority to identify the need for emergency accommodation. They should offer their expertise and support in finding alternatives to high cost, often poor quality bed and breakfast and other nightly-let provision.

Greater Manchester Housing Providers Group case study
The Greater Manchester Housing Providers Group are committed to working with the City Region mayor and local authorities to end homelessness. The partnership is working on a number of strategic and operational joint projects.

The partnership has:

- committed to meet the housing need of the Greater Manchester Social Impact Bond project with 270 homes being made available for people to access permanent housing (through a consortium of 15 housing associations and two private sector partners)
- committed to support the Housing First pilot through the direct provision of homes and support services
- committed to contribute to cold weather provision, while still needed in the short term
- developed a series of pledges to reduce homelessness in consultation with local authorities across each of the ten districts which make up Greater Manchester.

Commitment 2 – to operate flexible allocations and eligibility policies which allow individual applicants' unique set of circumstances and housing history to be considered.
A significant barrier for homeless people accessing social housing is the way eligibility and allocations criteria are applied.[5] While responsibility for setting eligibility criteria for the housing register generally sits with the local authority, individual housing association allocations create barriers to allocations too.

Housing associations should assess nominated households on an individual basis, considering reasons for any historic rent arrears or anti-social behaviour. Assessments should seek to understand whether any previous issues are relevant to the person's ability to succeed in their tenancy now. The trigger for the issues and the support available at the time should be considered.

Commitment 3 – to offer constructive solutions to applicants who aren't deemed eligible for an offer of a home.
There will be situations where a local authority or housing association decides offering someone a home is too great a risk to take if someone has struggled to succeed before.

In these cases, housing associations should offer a constructive and supportive approach to mitigate perceived risk of tenancy failure. Optional tenancy training should be offered to the excluded applicant with targeted support and information addressing any previous causes of tenancies failing.

It may be appropriate to delay an allocation until tenancy training is completed, or for the training to be completed while the tenant is offered a probationary or introductory tenancy.

Through Commitment 1, housing associations should work with their local authorities to identify registered applicants close to nomination that are considered unsuitable for an allocation; and offer pre-tenancy training in advance. It is also vital to make sure eligibility and allocations criteria are aligned to prevent inconsistencies in approach. These can lead to applicants feeling confused and frustrated with the allocations process.

Through our partnership with Homes for Cathy, Accent Housing and Surrey Heath council will run our Renting Ready training programme for people currently excluded from the local housing register.

Those who complete the course will be reinstated to the register. Accent Housing will suspend any restrictions previously placed on the applicant. The purpose of this Renting Ready pilot is to use the findings from the work to encourage other local authorities and housing associations to adopt more constructive approaches.

Commitment 4 – to not make any tenant seeking to prevent their homelessness, homeless (as defined by the plan definition).
Housing associations should not evict any tenant into any situation which meets this plan's definition of homelessness.

In exceptional circumstances, it may be that a tenant cannot remain in their current home. This could be because they are causing harm or distress to others or where the property is unaffordable or unsuitable for other reasons.

In such cases, local pre-eviction partnership agreements should then be in place to arrange reciprocal moves into an alternative home or into emergency accommodation. There should be a clear move-on plan in place so that emergency accommodation remains as brief an intervention as possible.

To achieve this, housing associations should be able to provide their tenants with quick access to effective tenancy support services and operate flexible rent arrears policies. This offer should be made proactively. There should be processes in place to identify and engage tenants who could struggle to maintain their tenancy without support.

Housing associations must maximise the capacity of support services. They should work in partnership with local organisations to identify the range of support services available to tenants as well as providing support directly themselves.

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

West Midlands Housing Association Partnership case study
Housing associations and local authorities through the West Midlands Housing Association Partnership have committed to a number of objectives to end homelessness. A key commitment is the resolve to not evict any tenant into homelessness. The partnership is in its infancy, but aims to meet this challenging commitment through a mixture of reciprocal agreements and pre-eviction planning.

Currently, West Midlands housing associations and Dudley local authority are sharing prevention approaches and then working together to reduce the risks of eviction. Where ending a tenancy is the only way forward, a programme of 'leaving well' will be triggered using all the support on offer in the locality to avoid a route to rough sleeping.

"Our approach with customers is to focus on their strengths, understanding where they want to get to and what it takes to get them there. Nobody wants their goal in life to be eviction. So our approach is geared up to coach our customers towards their goals by having honest and trusting relationships. Then by having good connections with their friends, community, agencies and our neighbourhood coaches, customers can start to put in place their own interventions and begin to recognise when things become more challenging, to help them stay on track towards what they want to achieve."

Vicky Green, Head of Locality – Black Country, Bromford Housing Group.

Commitment 5 – to commit to meeting the needs of vulnerable tenant groups.
Housing associations should have specific policies, procedures and partnerships to support access to their properties for vulnerable homeless people. This approach should continue in supporting vulnerable tenants to sustain and succeed in their tenancies.

Chapter 6, 'Preventing homelessness' identifies the characteristics of successful prevention and housing options services for young people; people leaving institutions such as the armed forces, hospital, the care system or prison; and for people experiencing domestic abuse.

Housing associations should be seeking to understand the levels of need for each of these groups and propose ways they can meet that need. Their understanding should be informed by local authority homelessness strategies.

During the consultation undertaken for this plan, supporting people experiencing domestic abuse was highlghted as an important role for housing associations.[6]

Local authorities and housing associations have already adopted a range of good practice in responding to domestic abuse. This is underpinned by better training and awareness by frontline housing and homelessness staff.

It is important to identify and respond to domestic abuse before it results in a homeless application. To support this, housing associations should commit to the CIH 'Make a Stand' pledge.[7] This pledge has been developed by CIH in partnership with the Domestic Abuse Housing Alliance (DAHA) and Women's Aid. It sets out how all housing orgnisations should support people who live and work in housing who are experiencing domestic abuse.

6 Hughes, N. (2018) *Have your say policy consultation: summary report*. London: Crisis.
7 Chartered Institute of Housing (2018) *'CIH launches new domestic abuse pledge for housing organisations'*. http://www.cih.org/news-article/display/vpathDCR/templatedata/cih/news-article/data/CIH_launches_new_domestic_abuse_pledge_for_housing_organisations

Commitment 6 – to work in partnership to provide a range of affordable housing options which meet the needs of all homeless people in their local communities.
Housing associations should provide access to a range of housing options for homeless people. Housing solutions to homelessness should be varied to meet the diverse needs and circumstances of homeless people.

Social housing is the most cost-effective solution to homelessness, see Chapter 11, 'Housing solutions to homelessness'. So housing associations should maximise their supply of social housing, wherever possible, and proactively support homeless people to access that supply. However, there is potential for homes of different tenure types and different rent levels to end the homelessness of some people.

Build to rent

Housing associations should consider how the homes that are being developed as part of build to rent or market rent initiatives, could meet the needs of some homeless people. Our experience in making the private rented sector work for homeless people and for private landlords[8] shows that housing associations shouldn't rule out the role they can play in offering tenancies to people moving out of homelessness, on the proviso they can afford them because they are in work, or where the rents fall within Local Housing Allowance levels.

There are also specific groups of homeless people who have even greater challenges in accessing affordable housing, such as those aged under 35. Given the diverse challenge of housing affordability across Great Britain, it is inevitable that not all parts of the country will need to provide a full range of specific housing offers. However, as per Commitment 1, a joint local approach should be undertaken to assess where gaps in affordable supply exist and where identified joint solutions could be proposed.

Shared housing
The need for affordable shared housing has been highlighted through our consultation process and by local authorities in *The Homelessness Monitor England*.[9]

Shared social housing could both provide additional supply and offer an alternative to poorer quality private rented sector Housing of Multiple Occupation. In addition, shared tenancies offer a more affordable housing option for some applicants, and can minimise the risk of social isolation.

Housing associations should consider their role in providing properties for sharing. Shared housing is not a solution for everyone. It requires specific planning on how properties will be allocated and managed. However, there is strong evidence of success when these things are put in place.

Shared housing properties can be directly managed by housing associations themselves. Alternatively, the housing association can work with local agencies to share the management and support of these tenancies. The need for shared housing should be identified through the homelessness strategy process. Our own Sharing Solutions

8 Rugg, J. (2014) *Crisis Private Rented Sector Access Development Programme: Year Two to April 2013*. York: University of York.
9 Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2018) *The Homelessness Monitor: England 2018*. London: Crisis.

Programme and help to rent funded programmes show that shared social housing succeeds best when part of a partnership[10] and where there is full organisational buy-in.

Newydd Housing Association case study
Newydd Housing Association runs Rooms4U – a shared housing pilot across Mid and South Wales. With partner housing associations in the local area, the Rooms4U project addresses the housing needs of single households on the common housing register. It does this by developing and supporting shared tenancies in the social and private rented sector.

Applicants for the project are prioritised on housing need. They are then supported to complete tenancy training and are matched into two and three bedroom accommodation offered on licence agreements. Rooms4U employs a dedicated project officer to manage the pilot and provide light touch, ongoing support to the shared tenancies.

Hull City Council case study
Hull City Council is piloting a shared housing project in their hard-to-let stock and are trialling two models of management. Several properties are being leased to local partner organisations who act as managing agents. They provide Hull City Council with guaranteed rent for the shared houses, at the same current rate as a single dwelling. Hull City Council is responsible for all required works.

Other stock is directly managed by Hull City Council and provides accommodation for applicants identified through the local authority's housing list and in collaboration with targeted youth support case workers. Occupants are on non-secure contractual tenancy agreements.

Applicants are supported to improve their independent living skills and pathways to employment. The local authority has employed two dedicated shared accommodation officers to support the pilot.

Commitment 7 – to ensure that properties offered to homeless people should be ready to move into.
Working with local authorities and the local voluntary sector housing associations should only offer homes that are ready to live in to people moving out of homelessness.

Social housing properties without furniture and white goods, carpets and wall coverings, will deter people on low incomes from accepting them. This issue was consistently raised during the consultation process to develop this plan.[11] It has also been highlighted by staff running local homelessness services and through our own direct services. Consequently, people on low incomes are often pushed towards private rented sector properties. These properties are usually ready to move into, but offer less security and higher rents.

To prevent this happening, housing associations should, through networking and the local voluntary sector, identify sources of cheap or free furniture and white goods. Alternatively, they could help tenants access affordable financing for these materials themselves.

Commitment 8 – to contribute to ending migrant homelessness in the areas housing associations operate.
Housing associations should, through engagement with local authority homelessness strategies, jointly determine the need for accommodation for people sleeping rough sleeping in the local area who do not have access to public funds and where voluntary reconnection is not an appropriate solution.

Where needed, housing associations should also work with local authorities and other local partners to offer emergency accommodation for homeless migrants who are not able to access statutory homelessness assistance. This should include letting properties for little or no rent as migrants in need of this accommodation are unlikely to have the means to pay a full rent. Consideration should be given to how harder-to-let properties or properties emptied in preparation for disposal or redevelopment could be used for this purpose.

Housing associations can, and in many areas already do, play an integral role in providing housing and support for destitute migrants. Examples of positive practice in this area can be found in Homeless Link's Migrant Destitution Toolkit.[12] Housing associations should also show their support publicly for migrants by signing up to the Housing Association Pledge for Migrant People.[13]

Commitment 9 – to lobby, challenge and inspire others to support ending homelessness.
Housing associations should use their profile and good reputation to show they share the ambition that homelessness can be ended. By using their expertise and connections they should encourage their peers and local and national government to share that ambition.

To help with this, housing associations should publish their eviction figures and the proportion of their housing stock which is taking people out of homelessness. These figures can then help identify best practice so lessons can be learnt and shared.

By giving these measures greater prominence we can better promote the idea that housing associations should be judged on their contribution to ending homelessness.

In summary
We know from the examples given and from the work we have done to date with housing associations that these commitments are already being met by some. The challenge is therefore one of scaling up existing approaches rather than devising new ones.

The creation of a duty to refer within *The Homelessness Reduction Act (2017)* in England is a start. It encourages other agencies, aside from local authorities, to prevent and relieve homelessness. However as private bodies, housing associations are not subject to this duty.

A housing association voluntary commitment to cooperate on homelessness would provide the foundation to meet the challenges set out above. Practically, such a commitment would manifest itself in different ways, in different housing markets, and for different housing associations.

By adopting such a commitment, housing associations would show that they believe homelessness can be ended and they recognise their role in achieving that. This commitment would be manifested in all housing associations' strategic aims and throughout their work with every tenant seeking to move out of homelessness.

10 Batty, E., Cole, I., Green, S., McCarthy, L. and Reeve, K. (2015) *Evaluation of the Sharing Solutions programme.* Sheffield: Sheffield Hallam University.
11 Hughes, N. (2018) *Have your say policy consultation: summary report.* London: Crisis.
12 Homeless Link (2016) *Migrant Destitution Toolkit.* https://www.homeless.org.uk/our-work/national-projects/strategic-alliance-on-migrant-destitution/migrant-destitution-toolkit
13 Innis Free (2018) *Pledge.* http://www.innisfree.org.uk/about-us/pledge/

Appendix 3: Crisis' contribution to ending homelessness

This plan is the blueprint for ending homelessness in Great Britain. It also defines the new context for our work.

This appendix outlines how we will play our part over the next five years to help bring about a permanent end to homelessness in England, Scotland and Wales.

18.1 Introduction

During the development of this plan, we were also developing our next five-year strategy which starts in July 2018.

Crisis' strategic plan 2018-2023
Our new strategy centres on implementing the plan to end homelessness. It focuses on making sure homeless people get the best possible benefit from our services and from our policy and campaigning work.

Crisis' strategic goals
We carried out a wide-ranging consultation and planning process for our new strategy. The following five goals emerged:

- to ensure that the policy changes needed to end homelessness are adopted
- to ensure that national governments in England, Scotland and Wales adopt their own plans for ending homelessness
- to demonstrate that homelessness can be ended in local areas
- to end the homelessness of more people through direct services
- to end homelessness for more of those currently excluded from help or with complex needs.

The following sections summarise the key priority areas for the organisation over the next five years.

18.2 Policy prioritisation

We will pursue positive changes to the policies that cause, sustain and solve homelessness across Great Britain. This includes housing, welfare and migration policy and homelessness legislation.

We will work with governments and across party lines to build consensus and solutions in these areas.

18.3 National homelessness strategies

We will support all three national governments to produce and publish full plans to end homelessness.

We will support the good work already begun through the Homelessness and Rough Sleeping Action Group in Scotland. As this becomes the Homelessness Prevention and Strategy Group, and moves to the next stage in producing tangible reforms, we will play our part to ensure the reforms are as bold and effective as possible.

In England, we will support the development and implementation of the forthcoming rough sleeping strategy. We will continue to invest our resources in supporting the implementation of *The Homelessness Reduction Act (2017)*.

Our goal will be met when administrations in England, Scotland and Wales each publish a comprehensive plan to end homelessness and make the necessary funding available.

18.4 Ending homelessness in local areas

During the past five years we have expanded our services across local areas in Great Britain. We will focus on achieving maximum impact for homeless people in those areas.

We will work with up to three areas to become early adopters of this plan. This will involve forming partnerships with local government to prepare for and plan a ten year strategy to end homelessness. To support this, we will bring policy, research and other dedicated resources, and invest in services locally.

We will ensure that the lessons and progress achieved in these areas are shared to inform national policy making, and vice versa. We also intend to support any other organisations and areas that are doing similar work by sharing the lessons we learn.

Where we already operate Crisis Skylight Centres, we will increase the support for local authority homelessness strategies. We will start by commissioning an audit of current homelessness provision in these areas.

18.5 Crisis' services

Ending homelessness for more people using Crisis' services, including those currently excluded from help or those with complex needs

Delivering services for homeless people will continue to be at the heart of our work. We will invest in building evidence, creating change and maximising our impact. The evidence we gather while supporting our clients will ensure that our national policy recommendations represent the changes that homeless people need.

We will use a new measure of 'homelessness ended'. This measure is when a client is at the successful point of leaving Crisis' services. Interim indicators of progress before a client leaves such as 'improved resilience', will be used too.

Our services will work with some of the most excluded homeless people. These will include migrant homeless people, people with complex and multiple needs, and those locked out of the benefits system.

This change of emphasis may mean that we work with fewer people.

Some key strategies for achieving success will include:

- introducing a more robust case management approach
- developing new or changing service models such rapid rehousing, Housing First solutions, and services for migrant homeless people
- providing more services for people who are rough sleeping, destitute or have complex support needs.

Ongoing evaluation of our own services

We will continue to commission external evaluations of the services we provide. These evaluations will help us gather externally-validated evidence about what works best to end homelessness. We will invest in and develop services that will maximise our ability to end the homelessness of the people we work with.

We are working with Dartington Service Design Lab[1] on the 'Hothouses for Innovation' partnership. This partnership is supporting three 'hothouses' (Crisis services in South Yorkshire, Edinburgh and Oxford) to test new approaches to improving outcomes for our clients.

The partnership uses a methodology called 'Rapid Cycle Innovation and Testing' to support clients and staff to develop and test innovations. Through the data gathered we will understand which innovations will help clients end their homelessness.

We will also use our new client management system to help us measure the effectiveness of our interventions. We can then determine those that are efficient and should be extended more widely, and those that need to be improved.

The lasting legacy of these approaches will be a methodology that we can continue to use to make evidence-based improvements to the services we provide.

Crisis at Christmas

Our services at Christmas are a vital part of what we do. We have changed and improved many aspects of our Christmas work over the years. The next five years will see further improvements that include:

- ensuring that our interventions and services at Christmas contribute to our goal of ending more people's homelessness
- using the opportunity of the public's heightened interest in homelessness at Christmas to reinforce the right messages about what causes homelessness and how it can be ended.

18.6 Shifting the narrative – reframing homelessness

Chapter 4 'Public attitudes and homelessness' details our groundbreaking work with the FrameWorks Institute. This two-year study[2] reveals the extent of the gap between the expert view of homelessness and the public's understanding of it.

If we, and others in our sector, do not begin to change the messages we communicate, it is unlikely that public responses will shift. This, in turn, will inhibit the political progress proposed by this plan.

We will play our part in changing our communications over the coming years. We are fully committed to assisting others in the sector, and working in partnership.

1 https://dartington.org.uk/

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

We will:

- complete the work started with the FrameWorks Institute to show how new and refined messages about homelessness positively change public responses
- work with sector membership bodies in England, Scotland and Wales to help disseminate these findings
- change our fundraising materials over time to reflect these new and improved ways of communicating about homelessness
- work with media contacts to understand and positively respond to the lessons of the research.

18.7 'What works' – building the evidence

Philanthropic funding has helped us set up a new Centre for Homelessness Impact with Glasgow Homelessness Network (GHN). The centre, launched in spring 2018, is building the evidence of how to effectively prevent and tackle homelessness. It is based in Glasgow, Edinburgh and London.

The centre is committed to filling the gaps in evidence. It will do this by involving government at local and national levels, as well as trusts and foundations, researchers, and others sharing our commitment to using evidence to achieve better results.

It will help policy-makers, commissioners and front line practitioners, to build and use evidence about 'what works'. They will be supported to make effective use of resources and to improve impact. In all of its work, the centre will strive to make evidence accessible; this will be through training, support for innovation, and interactive tools.

The initial programme of work includes:

- creating an evidence map and 'what works' guide to steer investment in homelessness services towards activities with the greatest impact
- developing an outcomes framework to help provide consistent aims and objectives, as outlined in Chapter 9 'Homelessness data'
- designing standards of evidence to help service providers and policy makers improve decisions about which interventions are the most effective.

The work of the centre is important to Crisis but we, alongside GHN, are committed to ensuring it is an independent body. We anticipate this happening by spring 2019.

18.8 Conclusion

Homelessness has grown and will continue to do so unless a different approach is taken. The Crisis 2018-23 strategy is about doing everything we can do, with others, to tackle this. In 2023 we want to look back on a successful five years and say that the end of homelessness is in sight.

Bibliography

Abbé Pierre Foundation – Feantsa (2018) *Third Overview of Housing Exclusion in Europe 2018*. http://www.feantsa.org/en/report/2018/03/21/the-secondoverview-of-housing-exclusion-in-europe-2017

Adam, S., Browne, J. and Joyce, R. (2013) *Submission to the Work and Pensions Committee's enquiry on support for housing costs in the reformed welfare system*. London: Institute for Fiscal Studies.

Ahmed, A., Wilding, M., Gibbons, A. Jones, K. Rogers, M. and Madoc-Jones, I. (2017) *Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014 Interim Report*. Cardiff: Welsh Government.

Alakeson, V. (2013) *The challenges of build to rent for UK Housing Providers*. London: Resolution Foundation.

Aldridge, R., Story, A., Hwang, S.W., Nordentoft, M., Luchenski, S.A., Hartwell, G., Tweed, E.J., Lewer, D., Katikireddi, S. V. and Hayward, A. C. (2017) 'Morbidity and mortality in homeless individuals, prisoners, sex workers, and individuals with substance use disorders in high-income countries: a systematic review and metaanalysis' in *The Lancet*. 391 (10117)

All Party Parliamentary Group on Refugees (2017) *Refugees Welcome? The experience of new refugees in the UK*. https://www.refugeecouncil.org.uk/assets/0004/0316/APPG_on_Refugees_-_Refugees_Welcome_report.pdf

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

Amnesty International (2016) *Cuts that hurt: the impact of legal aid cuts in England on access to justice*. London: Amnesty International.

Amnesty International (2017) *A matter of routine: the use of immigration detention in the UK*. London: Amnesty International.

Anderson, I. (2009) *'Homelessness policy in Scotland: A complete state safety net by 2012?'* in Fitzpatrick, S., Quilgars D. and Pleace, N. (eds.) *Homelessness in the UK: Problems and Solutions*. Coventry: Chartered Institute of Housing.

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

APPGEH (2017) *The APPG for Ending Homelessness Enquiry Session, 'How to prevent survivors of domestic violence from becoming homeless?* London: Crisis.

APPG for Ending Homelessness (2017) *Minutes*, 25th January. https://www.crisis.org.uk/ending-homelessness/appg-for-ending-homelessness/

APSE (Association for Public Service Excellence) (2018) *Delivering affordable homes in a changing work. Ensuring councils can meet local housing need*. Manchester: APSE.

Ashworth, A. (2015) *Shut Out briefing: young people, shared accommodation, and homelessness*. London: Crisis.

Association of Retained Council Housing (ARCH)/National Federation of ALMOs (NFA) (2017) *Raising the Roof – Analysis of Housing Revenue Account Headroom*. England: ARCH and NFA. http://www.almos.org.uk/include/getDoc.php?did=8021&fid=9428

Asylum Support Appeals Project (2017) *ASAP quarterly monitoring report, Q3 October – December 2017.* London: Asylum Support Appeals Project. http://www.asaproject.org/uploads/ASAP_2017_quarterly_q3_v2.pdf

Australian Government, Department of Social Services (2018) *National Affordable Housing Agreement.* https://www.dss.gov.au/housing-support/programmesservices/national-affordable-housing-agreement

Bail for Immigration Detainees (2018) *Follow up for Home Affairs Committee regarding immigration detention*. http://www.biduk.org/lists/3-policy

Barnardo's (2014) *On my own: The accommodation needs of young people leaving care in England*. London: Barnado's.

Barnardo's (2015) *Care leavers accommodation and support framework*. London: Barnardo's.

Basedow, J. and Doyle, L. (2016) *England's forgotten refugees: Out of the fire and into the frying pan*. London: Refugee Council.

Batty, E., Beatty, C., Casey, R., Foden, M., McCarthy, L. and Reeve, K. (2015). *Homeless people's experience of welfare conditionality and benefit sanctions*. London: Crisis.

Batty, E., Cole, I., Green, S., McCarthy, L. and Reeve, K. (2015) *Evaluation of the Sharing Solutions programme*. London: Crisis.

Baxter, D. and Murphy, L. (2017) *Priced Out? Affordable Housing in England*. London: IPPR.

BBC News (2018) 'Windrush: What is the 'hostile environment' immigration policy?' *BBC News*, 20th April: http://www.bbc.co.uk/news/av/uk-politics-43831563/windrush-what-is-the-hostile-environment-immigration-policy?intlink_from_url=http%3A%2F%2Fwww.bbc.co.uk%2Fnews%2Ftopics%2Fc9vwmzw7n7lt%2Fwindrush-deportation-row&link_location=live-reporting-map

BBC Online (2018), '*Royal wedding: Windsor rough sleeping plans 'withdrawn''* http://www.bbc.co.uk/news/uk-england-berkshire-43060022

BC Radio Canada (2015) *Medicine Hat becomes the first city in Canada to eliminate homelessness.* http://www.cbc.ca/radio/asithappens/as-it-happens-thursday-edition-1.3074402/medicine-hat-becomes-the-first-city-in-canada-to-eliminate-homelessness-1.3074742

Bengtsson, B. (2001) 'Housing as a social right: implications for welfare state theory', *Scandinavian Political Studies*, 24(4): 255–275.

Benjaminsen, L. and Bastholm Andrade, S. (2015) 'Testing a typology of homelessness across welfare regimes: shelter use in Denmark and the USA', *Housing Studies*, 30(6): 858-876.

Benjaminsen, L. (2013) 'Policy Review Up-date: Results from the Housing First based Danish Homelessness Strategy' in *European Journal of Homelessness 7.2*, pp. 109-131.

Benjaminsen, L. (2013) *Sustainable Ways of Preventing Homelessness. Peer Review in Social Protection and Social Inclusion programme*. Copenhagen: ÖSB Consulting.

Beresford, S, Earle, J. and Litchfield, Z. (2016) *Home truths: housing for women in the criminal justice system*. London: Prison Reform Trust.

Bevan, M. and Ruggs, J. (2006) *Providing Homelessness Support Services in Rural and Remote Areas: Exploring models for providing more effective local support*. Scotland: Communities Scotland.

Beveridge, C., Biberbach, P. and Hamilton, J. (2016) *Empowering planning to deliver great places – an independent review of the Scottish Planning System*. http://www.gov.scot/Resource/0050/00500946.pdf

Blood, I., Goldup, M., Peters, L. and Dulson, S. (2018 forthcoming) *Implementing Housing First across England, Scotland and Wales*. Imogen Blood Associates. London: Crisis and Homeless Link.

Bolt, D. (2016) *An inspection of the 'hostile environment' measures relating to driving licences and bank accounts: January to July 2016*. London: Independent Chief Inspector of Borders and Immigration.

Bolt, D. (2018) *An inspection of the "Right to Rent" scheme*. London: Independent Chief Inspector of Borders and Immigration.

Bowman, H. (2014) 'Why we will no longer convert social rented homes to affordable rent' in *The Guardian* 9th October. https://www.theguardian.com/housing-network/2014/oct/09/sovereign-housing-keep-social-rents-affordable

Bramley, G. (2017) *Homelessness projections: Core homelessness in Great Britain*, London: Crisis.

Bramley, G. (Forthcoming) *Homelessness projections: core, wider homelessness across Great Britain – extent, trends and prospects*. London: Crisis.

Bramley, G. and Fitzpatrick, S. (2018) *Homelessness in the UK: who is most at risk? in Housing Studies Journal*, Volume 22, Issue 1, pages 96 – 116. https://www.tandfonline.com/doi/ref/10.1080/02673037.2017.1344957?scroll=top.

Bramley, G., Fitzpatrick, S., Edwards, J., Ford, D., Johnsen, S., Sosenko, F. and Watkins, D. (2015) *Hard edges: Mapping severe and multiple disadvantage*. England: Lankelly Chase Foundation.

Britain, A., Robertson, L., Tate, J. and Craigforth, S.L. (2009) *Review of Section 5 of the Housing (Scotland) Act 2001*. Edinburgh: Scottish Government.

British Property Federation (2018) BPF BUILD TO RENT MAP OF THE UK. http://www.bpf.org.uk/what-we-do/bpf-build-rent-map-uk accessed February 2018.

Brown, P. and Scullion, L. (2014) *No Second Night Out: Derby City & Derbyshire. An evaluation for Riverside English Churches Housing Group*. Salford: University of Salford.

Brunton-Smith, I. and Hopkins, K. (2014), *Prisoners' experience of prison and outcomes on release: Waves 2 and 3 of SPCR*. London: Ministry of Justice.

Busch-Geertsema, V. and Fitzpatrick, S. (2008) 'Effective homelessness prevention? Explaining reductions in homelessness in Germany and England', *European Journal of Homelessness, 2*: 69-95.

Butler, D., Shannon, M. and Brown, P. (2015) *No Second Night Out: Salford and gate buddies: an evaluation for riverside ECHG Salford*, Salford: University of Salford.

Campbell, J., Golten, A., Jackson, R., and Evans, R. (2016) *Accessing and sustaining social tenancies: exploring barriers to homelessness prevention*. Cardiff: Shelter Cymru.

Campbell, J.A. (2011) *The Impact of Intentional Homelessness Decisions on Welsh Households' Lives*. Swansea: Shelter Cymru.

Centre for Social Justice (2017) *Housing First- housing led solutions to rough sleeping and homelessness*, London: Centre for Social Justice.

Centre for the Advancement of Critical Time Intervention (2014) *CTI Model*. https://www.criticaltime.org/cti-model/

Centrepoint (2016) *Preventing Youth Homelessness: What Works*. London: Centrepoint.

Chaloner, J., Dreisin, A. and Pragnell, M. (2015) *Building New Social Rent Homes. An Economic Appraisal*. SHOUT/National Federation of ALMOs.

Charted Institute of Housing (2018) *"More than 150,000 homes for social rent lost in just five years, new analysis reveals"*. News article. 31st January. http://www.cih.org/news-article/display/vpathDCR/templatedata/cih/news-article/data/More_than_150000_homes_for_social_rent_lost_in_just_five_years_new_analysis_reveals

Chartered Institute of Housing (2017) *Feeling the pinch – the lowered benefit cap one year on*. Coventry: Chartered Institute of Housing.

Chartered Institute of Housing (2017) *Housing First in the UK and Ireland*, London: Chartered Institute of Housing.

Child Poverty Action Group (2016) *Universal Credit Advances*. London: Children Poverty Action Group. http://www.cpag.org.uk/content/universal-credit-advances

Chartered Institute of Housing Scotland *The introduction of the LHA cap to the social rented sector: impact on young people in Scotland*. Scotland: Chartered Institute of Housing. http://www.cih.org/resources/PDF/Scotland%20Policy%20Pdfs/LHA/WEB%20LHA%20Scotland_research%20publication%20FINAL.pdf

Clarke, A. and Heywood, A. (2016) *Feasibility study of the prospect of developing a viable housing model for those entitled only to access the shared accommodation rate*. Cambridge: Cambridge Centre for Housing & Planning Research.

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

Clarke, N. (2017) *Perspectives on Rents and Affordability in Scotland: a briefing paper from CIH Scotland*. Edinburgh: Chartered Institute of Housing Scotland.

Cole, I., Green, S., McCarthy, L. and Pattison, B. (2015) *The Impact of the Existing Right to Buy and the Implications for the Proposed Extension of Right to Buy to Housing Associations*. England: Sheffield Hallam University/House of Commons Select Committee for Communities and Local Government.

Collinson, P. (2017) 'Half of landlords in one London borough fail to declare rental income', *The Guardian*, 13th August. https://www.theguardian.com/business/2017/aug/13/half-of-landlords-in-one-london-borough-fail-to-declare-rental-income

Commons Select Committee (2017) *Government's complacent attitude has failed homeless*. https://www.parliament.uk/business/committees/committees-a-z/commons-select/public-accounts-committee/news-parliament-2017/homeless-households-report-published-17-19/

Community Housing Cymru (2017) *Postcode lottery: the impact of applying the Local Housing Allowance to general needs social housing tenants in Wales*. Wales: Community Housing Cymru.

Community Links (2014) *Towards Effective Prevention: Practical Steps for the Next Government*. London: Community Links.

Connell, A. (2016) *The Development and Implementation of Part 2 of the Housing (Wales) Act 2014: Lessons for Policy and Practice in Wales*. Cardiff: Public PolicyInstitute for Wales.

Crane, M., Majorie, L., Joly, A., and Manthorpe, J. (2016) *Rebuilding Lives: Formerly homeless people's experience of independent living and their longer-term outcomes*. London: Kings College London.

Crane, M., Warnes, T. and Coward, S. (2011) *The FOR-HOME Study Moves to independent living Single homeless people's experiences and outcomes of resettlement*. Sheffield: University of Sheffield.

Crisis (2009) *Mental Ill Health in the Adult Single Homeless Population*. London: Crisis.

Crisis (2015) *The homelessness legislation: an independent review of the legal duties owed to homeless people*. London: Crisis.

Crisis (2016) *For Help to Rent projects*. London: Crisis. https://www.crisis.org.uk/ending-homelessness/housing-resource-centre/for-help-to-rent-projects/

Crisis (2017) *A Life in Limbo - the use of prolonged unsuitable accommodation for homeless people in Scotland*. London: Crisis.

Crisis (2017) *Not Home Yet: A History of Britain's attempts to Tackle Homelessness*. London: Crisis.

Crisis (2018 unpublished) *Innovating to increase the supply of permanent mainstream housing for homeless people: Summary of roundtable discussion on 14th February 2018*.

Crisis (2018) *FOI request to all England, Scotland and Wales councils*. Unpublished data.

Crisis (forthcoming) *Unsuitable temporary accommodation in Scotland*. London: Crisis.

Crisis, Groundswell and Uscreates (2018) *The lived experience of homelessness*. London: Crisis, Groundswell and Uscreates

Croucher, K. Quilgars, D and Dyke, A (2018) *Housing and life experiences: making a home on a low income*. York: Joseph Rowntree Foundation.

Culhane, D. P. (2008) The Costs of Homelessness: A Perspective from the United States in *European Journal of Homelessness* 2(1), 97-114.

Culhane, D., Metraux, S. and Hadley, T. (2002) *Public Service Reductions Associated with Placement of Homeless Persons with Severe Mental Illness in Supportive Housing. Housing Policy Debate*, 13(1), 107-163.

Cunningham, M,. Gillespie, S. and Anderson, J. (2015) *Rapid Re-Housing What the Research Says*. Washington: Urban Institute. https://www.urban.org/sites/default/files/publication/54201/2000265-Rapid-Re-housing-What-the-Research-Says.pdf

Daily Telegraph Television Staff (1966) Ministers to see 'Cathy' TV Play. *Daily Telegraph*.

Stuckler, D. and Basu. S. (2013) *The Body Economic: Why Austerity Kills*. New York: Basic Books.

Davies, L. and Fitzpatrick, S. (forthcoming) *A 'Perfect' Statutory Homelessness System for an Imperfect World: Principles, Priorities, Proposals and Possibilities*.

De Santos, R. (2012) *A better deal – towards more stable private renting*. London: Shelter.

De Wispelaere, J. and J. Walsh. 2007. "Disability Rights in Ireland: Chronicle of a Missed Opportunity." *Irish Political Studies* 22 (4): 517–543.

Dean, H. (2002) *Welfare Rights and Social Policy*. Harlow: Pearson Education Limited.

Department for Communities and Local Government (2013) *Providing social housing for local people. Statutory guidance on social housing allocations for local authorities in England*. London: DCLG.

Department for Communities and Local Government (2015) *Technical housing standards – nationally described space*. London: DCLG standard. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf

Department for Communities and Local Government (2017) *Fixing our broken housing market.* London: DCLG.

Department for Communities and Local Government (2017) *Planning and Affordable Housing for Build to Rent A consultation paper*. London: DCLG. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/589939/Build_To_Rent_consultation_document.pdf

Department for Communities and Local Government (2017) *Local authority housing statistics data returns for 2015 to 2016*. https://www.gov.uk/government/collections/local-authority-housing-data#2015-to-2016

Department for Work and Pensions (2011) *Two Year Review of the Local Housing Allowance*. London: Department for Work and Pensions.

Department for Work and Pensions (2011) *Universal Credit Policy Briefing Note 12*. London: The Department for Work and Pensions. http://webarchive.nationalarchives.gov.uk/+/http://www.dwp.gov.uk/docs/ucpbn-11-conditionality-threshold.pdf

Department for Work and Pensions (2013) *Housing Benefit Impact Assessment: uprating Local Housing Allowances by CPI from April 2013*. London: Department for Work and Pensions.

Department for Work and Pensions (2015) *The impact of recent reforms to Local Housing Allowances: Summary of key findings*. London: The Department for Work and Pensions.

Department for Work and Pensions (2016) *A guide to Employment and Support Allowance – The Work Capability Assessment*. London: The Department for Work and Pensions.

Department for Work and Pensions (2018) *Benefit cap: data to February 2018*. London: Department for Work and Pensions.

Department for Work and Pensions (2018) *Guidance: Universal Credit Advance*s. London: The Department forWork and Pensions. https://www.gov.uk/guidance/universal-credit-advances

Depaul (2017) *Nightstop Head calls for more volunteers*. 24th February: https://uk.depaulcharity.org/nightstop-head-calls-more-volunteers

Dobie, S., Sanders, B. and Teixeira, L. (2014) *Turned Away: The treatment of single homeless people by local authority homelessness services in England*. London: Crisis.

Doctors of the World UK (2017) *Deterrence, delay and distress: the impact of charging in NHS hospitals on migrants in vulnerable circumstances*. https://www.doctorsoftheworld.org.uk/Handlers/Download.ashx?IDMF=2a7fc733-ceef-4417-9783-d69b016ff74f

Empty Homes Agency (2018) *Empty Homes in England*. London: Empty Homes. http://www.emptyhomes.com/assets/ehe_2018_web-version.pdf

FEANTSA (2016) *'News: Finland leads the way on reducing homelessness with Housing First'*, 14th November: http:// www.feantsa.org/en/news/2016/11/14/finland-leads-the-way-on-reducing-homelessness-with-housing-first?bcParent=27

Fitzpatrick S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Scotland 2015*. London: Crisis.

Fitzpatrick, S. and Stephens, M. (2007) *An International Review of Homelessness and Social Housing Policy*. London: Department of Communities and Local Government.

Fitzpatrick, S. (2004) *'Homelessness policy in Scotland', in Sim, D. (ed.) Housing and Public Policy in Scotland*. Coventry: Chartered Institute of Housing.

Fitzpatrick, S. and Pawson, H. (2016) *Fifty years since Cathy Come Home: critical reflections on the UK homelessness safety net, International Journal of Housing Policy*. Volume 16, 2016 - Issue 4 Pages 543-555.

Fitzpatrick, S., and Stephens, M. (1999) 'Homelessness, need and desert in the allocation of council housing', *Housing Studies*, 14(4), 413-431.

Fitzpatrick, S., Bengtsson, B., and Watts, B. (2014). Rights to Housing: Reviewing the Terrain and Exploring a Way Forward. *Housing, Theory and Society*, 31(4), 447-463.

Fitzpatrick, S., Bramley, G., Sosenko, F., Blenkinsopp, J., Johnsen, S., Littlewood, M., Netto, G. and Watts, B. (2016) *Destitution in the UK*. York: Joseph Rowntree Foundation.

Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2012) *The homelessness monitor: England 2012*, London: Crisis.

Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Scotland 2015*. London: Crisis.

Fitzpatrick, S., Pawson, H., Bramely, G., Wilcox, S. and Watts, B. (2015) *The Homelessness Monitor: Wales 2015*. London: Crisis.

Fitzpatrick, S., Pawson, H., Bramley, G. and Wilcox, S. (2012) *The Homelessness Monitor: Scotland 2012*. London: Crisis.

Fitzpatrick, S., Pawson, H., Bramley, G. and Wilcox, S. (2017) *The Homelessness Monitor: England 2017.* London: Crisis.

Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S. and Watts, B. (2016) *The homelessness monitor: Great Britain 2016*, London: Crisis.

Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2017) *The homelessness monitor: Wales 2017.* London: Crisis.

Fitzpatrick, S., Pawson, H., Bramley, G., Wilcox, S., Watts, B. and Wood, J. (2018) *The homelessness monitor: England 2018*. London: Crisis/JRF

Fitzpatrick, S., Pleace, N., Bevan, M. (2005) *Final Evaluation of the Rough Sleepers Initiative*. Scottish Executive http://www.gov.scot/Resource/Doc/37428/0009584.pdf

Fitzpatrick, S., Quilgars, D., and Pleace, N. (2009). *Homelessness in the UK: Problems and Solutions*. Coventry: Chartered Institute of Housing.

Foley, B. (2017) *Delivering on Universal Credit*. London: Citizens Advice.

Fraser, R., Perry, J. and Duggan, G. (2017) *Building Bridges*. England: CIH/VIVID/Association of Retained Council Housing.

Frazer, R. (2017) "*Local Housing Companies: opportunities and concerns*", in Red Brick 15th December.

Future of London (2017) *Making the most of build to rent*. London: Future of London.

Gaetz, S. (2017) *THIS is Housing First for Youth: A Program Model Guide*. Toronto: Canadian Observatory on Homelessness Press.

Greater London Authority (2017) *Homes For Londoners Affordable Housing and Viability Supplementary Planning Guidance 2017.* https://www.london.gov.uk/sites/default/files/ah_viability_spg_20170816.pdf

Gladwell, M. (2006) Million-Dollar Murray: Why Problems Like Homelessness May be Easier to Solve than to Manage. *The New Yorker.* 13th February.

Glasgow Homelessness Network (2015) *Annual homelessness monitoring report April 2014 – March 15*. Glasgow: GHN. http://www.ghn.org.uk/wp-content/uploads/2015/10/GHN-Annual-ODM-Monitoring-Report-2014-15-FINAL.pdf

Bramley, G. and Fitzpatrick, S. (2017) Homelessness in the UK: who is most at risk?, *Housing Studies*. Volume 3. Issue 1: 96-116. https://www.tandfonline.com/doi/full/10.1080/02673037.2017.1344957#abstract

Gordon, I., Scanlon, K. Travers, T. and Whitehead, C. (2009) *Economic impact on the London and UK economy of an earned regularisation of irregular migrants to the UK*. GLA: London.

Gousy, H. (2014) *Safe and decent homes*. London: Shelter.

Gousy, H. (2016) *Home no less will do. Improving access to private renting for single homeless people*. London: Crisis.

Gousy, H. (2016) *No One Turned Away: Changing the law to prevent and tackle homelessness*. London: Crisis.

Gov.uk (2018) *Sir Oliver Letwin's interim report to the Chancellor of the Exchequer and the Secretary of State for Housing, Communities and Local Government*. https://www.gov.uk/government/publications/independent-review-of-build-out-preliminary-update

Government of Ireland (2018) *Rebuilding Ireland Strategy* http://rebuildingireland.ie/

Grayston, R. (2017) *Slipping through the loophole. How viability assessments are reducing affordable housing supply in England*. London: Shelter.

Greater London Authority (GLA) (2017) *Chain Annual Report 2016/17,* London: GLA.

Greaves, F. (2017) *Tackling Homelessness Together: The importance of local authorities and housing associations working in partnership*. England: The University of Sheffield, Chartered Institute of Housing. https://www.sheffield.ac.uk/polopoly_fs/1.731754!/file/TacklingHomelessnessTogether2.pdf

Greaves, R. (2017) *Homelessness prevention for care leavers, prison leavers, and survivors of domestic violence*. London: Crisis.

Green, S., McCarthy, L. and Pattison, B. (2017) *The Positive Pathway Model: A Rapid Evaluation of its Impact*. England: Sheffield Hallam University, Centre for Regional Economic and Social Research.

Groundswell (2016) *Room to Breathe*. London: Groundswell. http://groundswell.org.uk/wp-content/uploads/2017/10/ Groundswell-Room-to-Breathe-Leflet-Poster-for-Web.pdf

Groundswell (2018) *An End to Street Homelessness? A Peer-led Research Project for the Hammersmith and Fulham Commission on Rough Sleeping*. London: Groundswell. https://www.lbhf.gov.uk/sites/default/files/section_attachments/groundswell_commission_report.pdf

Gunner, G. and Knott, H. (1997) *Homeless on Civvy Street: Survey of Homelessness Amongst ex-Servicemen*. London: Ex-Service Action Group (ESAG).

Hackett, P. (2017) *Delivering the renaissance in council-built homes: the rise of local housing companies*. London: The Smith Institute.

Hastings, A., Bailey, N., Bramley, G., Gannon, M. and Watkins, D. (2015) *The Cost of the Cuts: The Impact on Local Government and Poorer Communities*. York: Joseph Rowntree Foundation.

Hewson, A. (2017) *Bromley Briefings prison factfile*. London: Prison Reform Trust.

Heywood, A. (2016) *Local housing, community living: prospects for scaling up and scaling out community-led housing*. London: The Smith Institute; https://beta.gov.scot/policies/more-homes/rural-housing-fund/

Hill, A. (2017) 'Hostile environment: the hardline Home Office policy tearing families apart', *The Guardian*, 28th November. https://www.theguardian.com/uk-news/2017/nov/28/hostile-environment-the-hardline-home-office-policy-tearing-families-apart

HM Treasury (2017) *Autumn Budget 2017.* https://www.gov.uk/government/topical-events/autumn-budget-2017.

HM Treasury (2018) *The Green Book: Central Government Guidance on Appraisal and Evaluation*, London: HM Treasury.

Holman, N., Fernandez-Arrigoitia, M., Scanlon, K. and Whitehead, C. (2015) *Housing in London: Addressing the Supply Crisis*. London: LSE.

Home Office (2005) *Controlling our borders: Making migration work for Britain. Five year strategy for asylum and immigration*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/251091/6472.pdf

Home Office (2015) *Evaluation of the Right to Rent scheme: Full evaluation report of phase one*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/468934/horr83.pdf

Homeless Link (2014) *Adopting the No Second Night Out Standard- Developing a service offer for those new to the streets*. London: Homeless Link.

Homeless Link (2014) *No Second Night Out across England*. London: Homeless Link.

Homeless Link (2014) T*he Unhealthy State of Homelessness – Health Audit Results 2014*. London: Homeless Link.

Homeless Link (2015) *'Housing First' or 'Housing Led'? The current picture of Housing First in England*, London: Homeless Link.

Homeless Link (2015) *Evaluation of the Homeless Hospital Discharge Fund*, London: Homeless Link.

Homeless Link (2015) *Preventing Homelessness to Improve Health and Wellbeing*. London: Homeless Link.

Homeless Link (2016) *Support for Single Homeless People in England: Annual Review 2016*. London: Homeless Link. https://www. homeless.org.uk/sites/default/files/site-attachments/Full%20report%20-%20Support%20for%20single%20 people%202016.pdf.

Homeless Link (2016) *Supporting people with no recourse to public funds (NRPF) Guidance for homelessness services*. London: Homeless Link. https://www.homeless.org.uk/sites/default/files/site-attachments/Supporting%20people%20with%20no%20recourse%20to%20public%20funds%20(NRPF)%202016.pdf

Homeless Link (2016), *How innovative legal help is supporting destitute migrants*. London: Homeless Link. https://www.homeless.org.uk/connect/features/2016/nov/02/how-innovative-legal-help-is-supporting-destitute-migrants.

Homeless Link (2017) *'New plans for supported housing'*. London: Homeless Link. https://www.homeless.org.uk/connect/news/2017/nov/01/new-plans-for-funding-supported-housing.

Homeless Link (2017) *Blog: Rough Sleeping Counts and Estimates – your questions answered*. London: Homeless Link. https://www.homeless.org.uk/connect/blogs/2017/aug/29/rough-sleeping-counts-andestimates-–-your-questions-answered.

Homeless Link (2017) *Counts and Estimates Toolkit 2017 Introduction & intelligence gathering*, London: Homeless Link.

Homeless Link (2017) *Support for single homeless people in England Annual Review 2016*, London: Homeless Link.

Homeless Link (2017) *Submission to the Work and Pensions Committee: Universal Credit Inquiry*. London: Homeless Link.

Homeless Link (2018) *Support for single homeless people in England Annual Review 2017*, London: Homeless Link.

Homeless Link (2018) *Young and Homeless 2018*. London: Homeless Link.

Homeless Link (unpublished), *The picture of Housing First in England*. London: Homeless Link.

Homelessness etc. (Scotland) Act 2003. https://www.legislation.gov.uk/asp/2003/10/contents

Homelessness Priority Need for Accommodation (England) Order, 2002. http://www.legislation.gov.uk/ uksi/2002/2051/contents/made

Homelessness Task Force (2004) *An Action Plan for Prevention and Effective Response*. Edinburgh: Scottish Executive. http://www.clacks.gov.uk/document/272.pdf

Homes for Scotland/Scottish Government (2017) *The Build to Rent Opportunity in Scotland*. Scotland: Homes for Scotland/Scottish Government. https://rigs.rent/storage/uploads/buildtorentopportunity.pdf

House of Commons Health and Social Care Committee (2018) *Oral evidence: Memorandum of understanding on data-sharing between NHS Digital and the Home Office, HC 677, 16 January 2018*. http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/health-committee/memorandum-of-understanding-ondatasharing-between-nhs-digital-and-the-home-office/oral/77354.html

House of Commons Home Affairs Committee (2018) *Immigration policy: basis for building consensus*. Second Report of Session 2017-19. London: House of Commons. https://publications.parliament.uk/pa/cm201719/cmselect/cmhaff/500/500.pdf

House of Commons Library (2016) *Rough Sleeping (England)*, briefing paper, House of Commons, London, 2016, http://researchbriefings.parliament.uk/ResearchBriefing/Summary/SN02007

House of Commons, Housing Communities and Local Government Committee (2018) *Private Rented Sector Fourth Report of Session 2017-19*. House of Commons

Housing (Wales) Act 2014. http://www.legislation.gov.uk/anaw/2014/7/contents/enacted

Housing First Europe Hub (2017) *Finland*. http://housingfirsteurope.eu/countries/finland/

Housing First Europe Hub (2018) *Housing First Guide*. http://housingfirsteurope.eu/guide/what-is-housing-first/introducing-housing-first/

Hughes, N. (2018) *Have your say policy consultation: summary report*. London: Crisis.

Hunter, J. and Lindsay, T. (2014) *Temporary accommodation modelling review 2014*. Edinburgh: Association of Local Authority Chief Housing Officers. http://www.welfarereformscotland.co.uk/downloads/Temporary_Accommodation_cost_modelling_report_June14.pdf

Ilott, O., Randall, J., Bleasdale, A. and Norris, E. (2016) *Making Policy Stick. Tackling long-term challenges in government*. London: Institute for Government. https://www.instituteforgovernment.org.uk/sites/default/ files/publications/5225%20IFG%20-%20Making%20Policy%20Stick%20WEB.pdf

Inside Housing (2017) *Welsh Government to merge Supporting People with other grant schemes*. 24 October. https://www.insidehousing.co.uk/news/news/welsh-government-to-merge-supporting-people-with-other-grant-schemes-52921

Insley, E. (2011) *Staying Safe: An Evaluation of Nightstop Services*. London: Depaul

Ipsos Mori (2015) *Perceptions of Homelessness*. https://www.ipsos.com/sites/default/files/migrations/en-uk/files/Assets/Docs/Homelessness-perception-topline-feb-2015.pdf

Ironmonger, J. (2018) 'EU rough sleepers win damages for illegal deportations', *BBC News*. 13th May: http://www.bbc.co.uk/news/uk-44093868

Jarrett, M., Thornicroft, G., Forrester, A., Harty, M., Senior, J., King, C., Huckle, S., Parrott, J., Dunn, G. and Shaw, J. (2012) Continuity of care for recently released prisoners with mental illness: A pilot randomised controlled trial testing the feasibility of a Critical Time Intervention. *Epidemiology and Psychiatric Sciences*, 21(2), 187-193.

Jefferys, P., Lloyd, T., Argyle, A,. Sarling, J., Crosby, J. and Bibby, J. (2014) *Building the homes we need*. KPMG/Shelter London: KPMG/Shelter. http://england.shelter.org.uk/__data/assets/pdf_file/0010/802567/Building_the_homes_we_need_digital_copy.pdf

Jeffreys, P. and Lloyd, T. (2017) *New Civic Housebuilding*. London: Shelter.

Johnsen, S. (2013) *Turning Point Scotland's Housing First Project Evaluation: Final Report*. Glasgow: Turning Point Scotland.

Johnsen, S. (2016), *Enforcement and interventionist responses to rough sleeping and begging: Opportunities, challenges and dilemmas, Report from the event hosted by Glasgow Homelessness Network and Crisis, with the support of the Economic and Social Research Council-funded Welfare Conditionality Project*, at the Adelphi Centre, Glasgow, York: The University of York.

Johnsen, S. and Watts, B. (2014) *Homelessness and poverty: reviewing the links*. Edinburgh: Heriot-Watt University.

Johnson, G. and Chamberlain, C. (2015) *Evaluation of the Melbourne Street to Home programme: Final Report*, Melbourne: HomeGround Services.

Johnson, S., Jones, A. and Rugg, J. (2008) *The experiences of Homeless Ex-Service Personnel in London*. England: Centre for Housing Policy, University of York.

Jones, A. and Pleace, N. (2010) *A review of Single Homelessness in the UK*. England: Crisis.

Jones, A., Bretherton, J., Bowles, R. and Croucher, K. (2010) T*he effectiveness of schemes to enable households at risk of domestic violence to remain in their own homes: research report*. London: DCLG.

Jones, A., Quilgars, D., O'Malley, L., Rhodes, D., Bevan, M. and Pleace, N. (2008) *Meeting the Housing and Support Needs of Single Veterans in Great Britain*. York: University of York.

Jones, J., Hough, J. and Broadway Homelessness and Support (2013), *No Second Night Out: A study of medium term outcomes: Summary report*, London: Broadway Homelessness and Support.

Jonson, P. (2017) Analysis provided from Westminster Council's EASI HELP initiative as part of the Crisis consultation. London: Crisis.

Joyce, R., Mitchell, M. and Norris Keiller, A. (2017) *The cost of housing for low income renters*. London: Institute for Fiscal Studies.

Just Right Scotland (2018) *Street Aware Project*, http://justrightscotland.org.uk/ourprojects/street-aware-project/

Kappala-Ramsamy, G. (2017) *Fully fund services to address homelessness in London*. Blog: https://www. londoncouncils.gov.uk/node/33095

Keast, M. (2017) *Understanding and responding to modern slavery within the homelessness sector*. London: The Passage.

Kenna, P. (2005) *Housing Rights and Human Rights*. Brussels: FEANTSA.

Kennedy, S. (2015) *Measures to limit migrants' access to benefits, House of Commons Library Briefing Paper 06889*. http://researchbriefings.files.parliament.uk/documents/SN06889/SN06889.pdf

Kennedy, S., Wilson, W., Apostolova, V., Keen, R. (2016). The Benefit Cap. London: The House of Commons Library.

Kilroy, J. (2017) *Better Planning for Housing Affordability – Position Paper, February 2017.* RTPI.

Kirkup, J. and Winnett, R. (2012) Theresa May interview: 'We're going to give illegal migrants a really hostile reception', *The Telegraph*, 25th May. http://www.telegraph.co.uk/news/uknews/immigration/9291483/Theresa-May-interview-Were-going-to-give-illegal-migrants-a-really-hostile-reception.html

Law Commission (2017) *Thirteenth Programme of Law Reform*. London: Law Commission.

Lawton, K., Cook, P., Pearce, N. (2014). *The Condition of Britain: Strategies for social renewal*. England: IPPR.

Le Grand, J. (1997). Knights, Knaves or Pawns? Human behaviour and Social Policy. *Journal of Social Policy*, 26(2), 149-169.

Leopold, J. and Ho, H. (2015) *Evaluation of the 100,000 Homes campaign*. Washington: Urban Institute.

Lévy-Vroelant, Claire. "The Right to Housing in France: Still a Long Way to Go from Intention to Implementation." *Journal of Law and Social Policy 24*. (2015): 88-108.

Lister, R. (2004) *Poverty*. Cambridge: Polity Press.

Littlewood, M., Bramley, G., Fitzpatrick, S. and Wood, J. (2017), *Eradicating 'Core Homelessness' in Scotland's Four Largest Cities: Providing an Evidence Base and Guiding a Funding Framework*, Edinburgh: Heriot-Watt University and Social Bite.

London Councils (2015) *The impact of permitted development rights for office to residential conversions*. London: A London Councils Briefing.

London Councils/London First/Turley (2017) *Everything you need to know about build to rent in London*. London: London Councils/London First/Turley.

Long, S. (2018) Quarterly Analysis: BTR. *Build to Rent, February 2018*. London: Molior London.

Mackie, P. and Thomas, I. (2014) *Nations Apart? Experiences of single homeless people across Great Britain*. London: Crisis.

Mackie, P. and Thomas, I. (2015) *Single Homelessness in Scotland*. London: Crisis. https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/services-and-interventions/single-homelessness-in-scotland-2015/

Mackie, P. and Thomas, I. (2016) *Transitory Single Homelessness in Wales*. Cardiff: Cardiff University.

Mackie, P., Fitzpatrick, S., Stirling, T., Johnsen, S., and Hoffman, S. (2012) *Options for an Improved Homelessness Legislative Framework in Wales*. Cardiff: Welsh Government.

Mackie, P., Johnsen, S., and Wood, J. (2017) *Ending rough sleeping: what works? An international evidence review.* London: Crisis.

Mackie, P., Thomas, I. and Bibbings, J. (2017) 'Homelessness prevention: reflecting on a year of pioneering Welsh legislation in practice, *European Journal of Homelessness*, 11(1): 81-107.

Malfait, R., Cottrell, S. and Fylnn, N. S. (2017) *Migrant destitution: survey and consultation, commissioned by the Strategic Alliance on Migrant Destitution*. https://www.homeless.org.uk/sites/default/files/site-attachments/SAMD%20Destitution%20Survey%20Summary%20Report%20June%202017.pdf

Marshall, T., Goldberg, R., Braude, L., Dougherty, R., Daniels, A., Ghose, S., George, P., Delphi-Rittmon, M. (2014) Supported employment: assessing the evidence. *Psychiatric Services*, 65(1), 16-23. United States: National Coalition for Homeless Veterans.

Mayblin, L. and James, P. (2017) *Asylum and refugee support: civil society filling the gaps?* Coventry: University of Warwick, Economic & Social Research Council.

Mayor of London (2017) *London Housing Strategy, draft for public consultation, September 2017.* London: Greater London Authority.

McGuinness, T., Kennedy, S., Jones, A. (2016) *Jobcentre Plus Flexible Support Fund.* England: House of Commons Library.

Ministry for Housing Communities and Local Government (2017) English Housing Survey headline report, 2016-17; Scottish Government (2017) Scottish House Condition Survey 2016.

McHugh, K. and Turner, S. (2018) *Evidence review of employment support for homeless people for Crisis*.

Messih, J. (2017) Homelessness Reduction Act: is the funding sufficient? *InsideHousing*, 20 December. https://www.insidehousing.co.uk/insight/insight/homelessness-reduction-act-is-the-funding-sufficient-53650

Ministry for Housing, Communities and Local Government (2016) *Rough sleeping statistics England autumn 2016: table 2*. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2016.

Ministry for Housing Communities and Local Government (2017) *Government to lead national effort to end rough sleeping*. London: MHCLG. https://www.gov.uk/government/news/government-to-lead-national-effort-to-end-rough-sleeping

Ministry of Housing, Communities and Local Government (2017) *Sajid Javid's speech to the National Housing Federation conference 2017.* 19th September. https://www.gov.uk/government/speeches/sajid-javids-speech-to-the-national-housing-federation-conference-2017

Ministry for Housing Communities and Local Government (2018) *Draft revised National Planning Policy Framework* https://www.gov.uk/government/consultations/draft-revised-national-planning-policy-framework

Ministry for Housing Communities and Local Government (2018) *Homelessness Code of Guidance for Local Authorities*. London: MHCLG.

Ministry for Housing Communities and Local Government (2018) *Rough sleeping statistics England autumn 2017: table 2b*. London: MHCLG. https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017#history

Ministry for Housing, Communities and Local Government & Department of Education (2018) Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation. London: MHCLG and DoE.

Ministry for Housing, Communities and Local Government (2018) *Table 678: Social Housing Sales*. London: Ministry for Housing, Communities and Local Government.

Ministry of Defence (2015) 'Tri-service resettlement and employment support manual.' *Joint Service Publication (JSP)* 534, Issue 14

Ministry of Housing, Communities & Local Government (2017) *Prevention and relief live tables: October to December 2017*, Table 774. London: MHCLG

Moisl, E., Albanese, F., Sanders, B., Leith, G., Rahman, L. and Sutton-Hamilton, C. (2018) *Evaluation of the StreetLink project*. London: Crisis.

Morphet, J. and Clifford, B. (2017) *Local authority direct provision of housing*. UCL, RTPI, National Planning Forum.

Moss, K. and Singh, P. (2015), *Women Rough Sleepers in Europe: Homelessness and Victims of Domestic Abuse*, London: Policy Press.

NACCOM (2017) *The No Accommodation Network. Annual Report 2016-17*. Newcastle: NACCOM.

NACCOM (2018) *Evidence for APPG on Ending Homelessness*. https://naccom.org.uk/submission-appg-ending-homelessness-recommendations-change/

National Alliance to End Homelessness (2017) *How Many Veterans Experience Homelessness?* https://endhomelessness.org/homelessness-in-america/who-experiences-homelessness/veterans/

National Assembly for Wales Equality, Local Government and Communities Committee (2018) *Life on the streets: preventing and tackling rough sleeping in Wales*. Cardiff: National Assembly for Wales.

National Assembly for Wales Public Accounts Committee (2015) *Responding to Welfare Reform in Wales*. Cardiff: National Assembly for Wales Public Accounts Committee.

National Audit Office (2012) *Financial Viability of the social housing sector: introducing the Affordable Homes Programme*. London: National Audit Office.

National Audit Office (2014) *The impact of funding reductions on local authorities*. London: National Audit Office.

National Audit Office (2017) *Homelessness*. London: National Audit Office.

National Audit Office (2017) *Homelessness: report by Comptroller and Auditor-General Department for Communities and Local Government*. London: National Audit Office.

National Housing Federation (2016) *Briefing: The growing Housing Benefit spend in the PRS*. London: NHF.

National Institute for Care Excellence (2015) *Transition between inpatient hospital settings and community or care home settings for adults with social care needs* (NICE guideline [NG27]).

National Statistics (2017) *Homelessness in Scotland: 2016/17, table 3*. Edinburgh: Scottish Government.

National Statistics (2017) Statistical First Release: Homelessness in Wales, 2016 -17. Cardiff: Welsh Government.

NCLTN (2017) *Government relaunches multi-million Community Housing Fund*. London: NCLTN. http://www.communitylandtrusts.org.uk/article/2017/11/29/government-relaunches-multi-million-community-housing-fund

NCLTN (2018) *Why CLTs* http://www.communitylandtrusts.org.uk/what-is-a-clt/whyclts

Northern Housing Consortium (2016) *A New Framework for Housing in the North*. Sunderland: NHC.

No Second Night Out http://www.nosecondnightout.org.uk/

O'Neil, M., Gerstein Pineau, M., Kendall-Taylor, N., Volmert, D., Stevens, A. (2017) *Finding a Better Frame: How to Create More Effective Messages on Homelessness in the United Kingdom*. Washington: FrameWorks Institute.https://www.crisis.org.uk/media/237700/finding_a_better_frame_2017.pdf

O'Sullivan, E. (2008) 'Sustainable solutions to homelessness: The Irish case', *European Journal of Homelessness*, 2: 205–233.

Office for Budget Responsibility (2015) *Economic and Fiscal Outlook*. CM9088

Office of the Deputy Prime Minister (2002) *Addressing the Health Needs of Rough Sleepers*, December 2002. http://www.fph.org.uk/uploads/r_rough_sleepers_2002.pdf

Office of National Statistics (2017) *Statement on classification of English housing associations*, November 2017. https://www.ons.gov.uk/news/statementsandletters/statementonclassificationofenglishhousingassociationsnovember2017

Ornelas, J. (2013) *Casas Primeiro, Lisboa. Final Report for Housing First Europe Project (Lisbon)*. http://www.giss-ev.de/files/giss/upload/PDF%20HFE/Lisbon_HFE_Local_Evaluation.pdf

Osborne, H (2015), 'Hackney council in east London drops threat to fine rough sleepers', *The Guardian*, 5th June. https://www.theguardian.com/uk-news/2015/jun/05/hackneycouncil-drops-threat-to-fine-rough-sleepers

Padley, M., Hill, L. and Hirsch, D. (2015) *Minimum budgets for single people sharing accommodation*. Centre for Research in Social Policy. Loughborough: Loughborough University.

Palepu, A., Patterson, M. L., Moniruzzman, A., Frankish, C.J. and Summers (2013) 'Housing First improves residential stability in homeless adults with concurrent substance dependence and mental disorders', *American Journal of Public Health*, 103(S2).

Parker, I and Isaksen, M (2017) *A state of disrepair. Why renters deserve a better deal*. London: Citizens Advice.

Parkin, E. and Wilson, W. (2016) *Social Housing: The ending of Lifetime tenancies in England*. London: House of Commons Library.

Parliment.uk (2018) *Homelessness Reduction Act 2017: Progress of the Bill*. https://services.parliament.uk/bills/2016-17/homelessnessreduction.html

Parliamentary and Health Service Ombudsman (2016) *Complaints about UK government departments and agencies, and some UK public organisations 2015–16*. https://www.ombudsman.org.uk/sites/default/files/Complaints_about_parliamentary_departments_2015-16.pdf

Parliamentary Office of Science and Technology (2017) *Migrants and housing*. http://researchbriefings.files.parliament.uk/documents/POST-PN-0560/POST-PN-0560.pdf

Parsell, C. andTomaszewski, T. (2013), *Evaluation of the Brisbane Street to Home programme: Final Report*, Canberra: Department of Families, Housing, Community Services and Indigenous Affairs. http://wahousinghub.org.au/display/RES/2014/11/12/An+Evaluation+of+Brisbane+Street+to+Home%3A+Final+Report.

Parsell, C. (2011), Responding to People Sleeping Rough: Dilemmas and Opportunities for Social Work, *Australian Social Work*, 64(3): 330-345.

Partnerships for opening doors (2014) *A summit on integrating employment and housing strategies to prevent and end homelessness*. https://www.usich.gov/resources/uploads/asset_library/Partnership_Summit_Effective_Practices.pdf

Patel, C. and Peel, C. (2017) *Passport Please: The impact of the Right to Rent checks on migrants and ethnic minorities in England*. London: Joint Council for the Welfare of Immigrants, http://www.jcwi.org.uk/sites/default/files/2017-02/2017_02_13_JCWI%20Report_Passport%20Please.pdf

Pathway (2018) *Pathway Services*. http://www.pathway.org.uk/about-us/

Pawson, H. and Davidson, E. (2008) 'Radically divergent? Homelessness policy and practice in post-devolution Scotland', *European Journal of Housing Policy*, 8(1): 39-60.

Pawson, H., Netto, G., Jones., C., Wager, F., Fancy, C. and Lomax, D. (2007) *Evaluating Homelessness Prevention*. London: Department for Communities and Local Government.

Pearce, N. and Taylor, E. (2013). *British Social Attitudes 30*. London: Natcen.

Ipsos Mori (2015) *Perceptions of Homelessness*. 9th February. https://www.ipsos.com/ipsos-mori/en-uk/perceptions-homelessness

Perry, J. (2015) "Should councils borrow to build houses that aren't for social rent" in *Public Finance*. 2nd Feb. https://www.publicfinance.co.uk/2015/02/should-councils-borrow-to-build-houses-that-arent-for-social-rent

Perry, J. (2018) 'Developers are skimping on low cost housing. Time to get tough.' *Guardian Housing Network*. 19th March. https://www.theguardian.com/housing-network/2018/mar/19/affordablehomes-low-cost-rent-uk-planning-policy-government-developers?CMP=ema-1703andCMP=

Petch, H., Perry. J. and Lakes, S. (2015) *How to improve support and services for destitute migrants*. York: Joseph Rowntree Foundation.

Phillips, R. and Parsell, C. (2012) *The role of assertive outreach in ending 'rough sleeping', AHURI Final Report No.179*. Melbourne: Australian Housing and Urban Research Institute.

Pipe, D. (2017) *CIH response to: work and pensions benefit cap inquiry*. Coventry: Chartered Institude of Housing.

Pleace, N. and Bretherton, J. (2017) *Crisis Skylight: Final Report of the University of York Evaluation*. London: Crisis.

Pleace, N. and Bretheton J. (2015), *Housing First in England: An Evaluation of Nine Services*, York: Centre for Housing Policy.

Pleace, N. and Culhane, D.P. (2016) *Better than Cure? Testing the case for Enhancing Prevention of Single Homelessness in England*. London: Crisis. https://www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/cost-of-homelessness/better-than-cure-2016/

Pleace, N. (2018) *Using Housing First in Integrated Homelessness Strategies A Review of Evidence*. York: Centre for Housing Policy: University of York https://www.mungos.org/wp-content/uploads/2018/02/ST_Mungos_HousingFirst_Report_2018.pdf

Pleace, N., Baptista, I., Benjaminsen, L., Volker Busch-Geertsemal (2013) *The Costs of Homelessness in Europe: An Assessment of the Current Evidence Base*. Brussels: FEANTSA.

Pleace, N., Fitzpatrick, S., Johnsen, S., Quilgars, D. and Sanderson, D. (2008) *Statutory Homelessness in England: The experience of families and 16-17 year olds*. CLG.

Pleace, N., Teller, N. and Quilgars, D. (2012) *Social Housing Allocation and Homelessness: EOH Comparative Studies on Homelessness 1*. Brussels: FEANTSA.

Pollock, I. (2018) Housing 'crisis': Shelter Cymru urges investment. *BBC News*. http://www.bbc.co.uk/news/uk-wales-43476298

Powell, R., Dunning, R., Ferrari, E. and McKee, K. (2015) *Affordable Housing Need in Scotland – Final Report September 2015*. Scotland: SGHA/CIH/Shelter Scotland.

Powell, R., Dunning, R., Ferrari, E. and McKee, K. (2016) *Affordable Housing Need in Scotland: Final Report – September 2015*. Edinburgh: Shelter Scotland.

Power, A., Berlotti, A., Lane, L., and Provan, B. (2018) *Private renting: Can social landlords help?* CASE Report 113. LSEP.

PricewaterhouseCoopers LLP (2016) *Creating social value and building social capital*. London: St Giles Trust.

PricewaterhouseCoopers LLP (2018) *Assessing the costs and benefits of Crisis' plan to end homelessness*. London: PWC.

Public Policy Institute for Wales (2016) *The Development and Implementation of Part 2 of the Housing (Wales) Act 2014: Lessons for Policy and Practice in Wales.* http://ppiw.org.uk/files/2017/07/PPIWHomelessness-Policy-Reunion-Report-July-2017-final.pdf

Quilgars, D. and Pleace, N. (2017) *The Threshold Housing First Pilot for Women with an Offending History: The First Two Years Report of the University of York Evaluation*. York: University of York. https://www.york.ac.uk/media/chp/documents/Threshold%20Housing%20First%20Evaluation%20Report%20-%20FINAL%20(14-3-18).pdf

Quilgars, D., Johnsen, S. and Pleace, N. (2008) *Youth homelessness in the UK*. York: Joseph Rowntree Foundation.

Rae, A., Hamilton, R., Crisp, R. and Powell, R. (2018) *Overcoming Deprivation and Disconnection in UK cities*. York: Joseph Rowntree Foundation.

Raising the Roof (2018) *What we do*, http://www.raisingtheroof.org/what-we-do/our-initiatives/the-upstream-project/

Randall, G. and Brown, S. (1994) F*alling Out: A Research Study of Homeless Ex-Service People*. London: Crisis.

Randall, G. and Brown, S. (2002) *Helping Rough Sleepers Off the Streets: A Report to the Homelessness Directorate*. London: ODPM.

Reeve, K., Cole, I., Batty, E., Foden, M., Green, S. and Pattison, B. (2016) *Home no less will do. Homeless People's access to the Private Rented Sector.* London: Crisis.

Reeve, K., Green, S., Pattison, B., Wilson, I. and Cole, I. (2017) *Capping aspiration: the millenial housing challenge*. Sheffield: Sheffield Hallam University.

Refugee Action (2017) *Slipping through the cracks: How Britain's asylum support system fails the most vulnerable*. London: Refugee Action.

Refugee Council (2018) *Asylum statistics annual trends*, February 2018. https://www.refugeecouncil.org.uk/assets/0004/2566/Asylum_Statistics_Annual_Trends_Feb_2018.pdf

Rice, B., and Reed, L. (2016) *No First Night Out – help for single homeless people (interim report)*, London: London Boroughs of Tower Hamlets and Hackney and the City of London.

Robson, B. (2018) *Using the Social Housing Green Paper to boost the supply of low-cost rented homes*. York: JRF. https://www.jrf.org.uk/file/51011/download?token=JZg1DLwe&filetype=download

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

Rogers Stirk Harbour + Partners (2018) *Y:Cube*. https://www.rsh-p.com/projects/ycube/

Rugg, J. (2014) *Crisis' Private Rented Sector Access Development Programme Final Evaluation Report*. London: Centre for Housing Policy, University of York and Crisis.

Sandbach, J. (2012) *Out of scope, out of mind: Who really loses from legal aid reform*. London: Citizens Advice Bureau.

Sanders, B. and Albanese, F. (2016) *"It's no life at all": Rough sleepers' experiences of violence and abuse on the streets of England and Wales*, London: Crisis.

Sanders, B. and Albanese, F. (2017) *An examination of the scale and impact of enforcement interventions on street homeless people in England and Wales*. London: Crisis.

Sanders, B. and Teixeira, L. (2012) *No room available: study of the availability of shared accommodation*. London: Crisis.

Sarling, J. and Blyth, R. (2013) *Delivering Large Scale Housing: Unlocking Schemes and Sites to Help Meet the UK's Housing Needs*. London: RTPI.

Sarsfield, B. (2018) "Why we are freezing or cutting rents on thousands of homes". *Inside Housing.* 02/05/2018: https://www.insidehousing.co.uk/comment/comment/why-we-are-freezing-or-cutting-rents-on-thousands-of-homes-56040

Save the Children (2018) *Lost opportunities, lost incomes*. London: Save the Children.

Savills (2017) *Spotlight: Investing to solve the housing crisis*. London: Savills.

Sayce, S. Crosby, N. Garside, P., Harris, R. and Parsa, A. (2017) *Viability and the Planning System. The Relationship between Economic Viability Testing, Land Values and Affordable Housing in London*. London: Kingston University/Reading University/RAU/Ramidus.

ScotPHO (2017) *Homelessness: demographics*. Glasgow: The Scottish Public Health Observatory. http://www.scotpho.org.uk/life-circumstances/homelessness/data/demographics/

Scottish Empty Homes Partnership (2016) *Guide to Financing Private Sector Empty Homes Work 2016 Update*. London: Shelter.

Scottish Empty Homes Partnership (2017) *Scottish Empty Homes Partnership Annual Report 2016-17*. Edinburgh: Shelter Scotland.

Scottish Government (2017) Homelessness and rough sleeping action group. https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group

Scottish Government (2017) *Homelessness and rough sleeping action group*. Edinburgh: Scottish Government. https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group

Scottish Government (2017) *Homelessness in Scotland: Annual Publication 2016/17*. Edinburgh: Scottish Government.

Scottish Government (2017) *Places People and Planning Position Statement*. http://www.gov.scot/Resource/0052/00521888.pdf

Scottish Government (2018) *Homelessness in Scotland: update to 30 September 2017*. https://beta.gov.scot/publications/homelessness-scotland-update-30-september-2017/

Scottish Government (2018) *Action to end rough sleeping*. https://beta.gov.scot/news/action-to-end-rough-sleeping/

Scottish Government, Community Empowerment Team (2018) Community empowerment. https://beta.gov.scot/policies/community-empowerment/

Scottish Government (2018) E*nding Rough Sleeping in Scotland: An interim report on the activity of the Homelessness and Rough Sleeping Action Group*, https://news.gov.scot/news/homelessness-and-rough-sleeping-action-group

Scottish Government (2018) *More homes*. (https://beta.gov.scot/policies/more-homes/affordable-housing-supply/

Scottish Government Homelessness and Rough Sleeping Action Group (2018) *Q2 Ending Rough Sleeping Working Paper, Workstream: Measuring rough sleeping*.

Scottish Housing News (2017) *First youth 'Housing First' project launched in the UK*. http://www.scottishhousingnews.com/17582/first-youth-housing-first-project-launched-in-the-uk/

Scottish Housing Regulator (2014) *Housing Options in Scotland: A Thematic Inquiry*. https://www.scottishhousingregulator.gov.uk/publications/housing-options-scotland-thematic-inquiry

Scottish Housing Regulator (2018) *Housing People Who Are Homeless in Glasgow*. https://www.scottishhousingregulator.gov.uk/publications/housing-people-who-are-homeless-glasgow

Scottish Quality Standards (2017) *Housing Advice, Information and Support for people in and leaving prison: Sustainable Housing Outcomes on Release for Everyone*. Scottish Prison Service.

Scottish Women's Aid and Fife Domestic and Sexual Abuse Partnership (2015) *Change, justice, fairness: "Why should we have to move everywhere and everything because of him?"*. Scotland: Fife Council.

Luchenski, S., Maguire, N., Aldridge, R. W., Hayward, A., Alistair, S., Perri, P., Withers, J., Clint, S., Fitzpatrick, S. and Hewett, N. (2017) What works in inclusion health: overview of effective interventions for marginalised and excluded populations. *The Lancet*, Volume 391, Issue 10117, 266 – 280.

SFHA and Shelter Scotland (2017) *First Month's Rent Flexibilities: Good Practice Guide*. Scotland: SFHA/Shelter. https://scotland.shelter.org.uk/__data/assets/pdf_file/0007/1413394/First_Month27s_Flexibilities_-_FINAL.pdf/_nocache

Shaheen, G. and Rio, J. (2007) *Recognizing Work as a Priority in Preventing or Ending Homelessness*. http://www.nchv.org/images/uploads/Work%20as%20a%20Priority%20Journal%20of%20Prevention_WEB.pdf

Shelter (2015) *Cuts and changes to LHA for private renters*. London: Shelter

Shelter (2016) *Achieving the Ambition: Building one million homes this Parliament*. London: Shelter.

Shelter (2017) *Press release: Eviction from a private tenancy accounts for 78% of the rise in homelessness since 2011*. https://england.shelter.org.uk/media/press_releases/articles/eviction_from_a_private_tenancy_accounts_for_78_of_the_rise_in_homelessness_since_2011

Shelter (2018) *Shelter Briefing: Draft National Planning Policy Framework*. London: Shelter.

Shelter Cymru (2016) *Accessing and sustaining social tenancies*. Cardiff: Shelter Cymru.

Shelter Cymru (2016) *Reasonable Steps: Experiences of Homeless Services Under the Housing (Wales) Act 2014*. Cardiff: Shelter Cymru. https://sheltercymru.org.uk/wp-content/uploads/2015/02/Reasonable-Steps.pdf

Shelter Scotland (2009) *Landlord registration in Scotland: Three years on*. Edinburgh: Shelter Scotland.

Shelter Scotland (2016) *Funding Homelessness Services in Scotland*. Edinburgh: Shelter Scotland.

Shelter Scotland (2016) *Homelessness: Far From Fixed Why Scotland needs a National Homelessness Strategy*. Edinburgh: Shelter Scotland https://scotland.shelter.org.uk/__data/assets/pdf_file/0007/1278178/FarFromFixedPolicyPaperFINAL.pdf

Shelter Scotland (2017) *The use of temporary accommodation in Scotland*. Edinburgh: Shelter Scotland. https://scotland.shelter.org.uk/__data/assets/pdf_file/0020/1325711/The_use_of_temporary_accommodation_in_Scotland.pdf/_nocache

Silverman, S. (2017) *Immigration Detention in the UK, 5th revision*. Oxford: University of Oxford, The Migration Observatory

Smith, A. (2017) *Could Critical Time Intervention work in England?* Fulfilling Lives Newcastle Gateshead. Blog: https://www.homeless.org.uk/connect/blogs/2017/jul/07/could-critical-time-intervention-work-in-england

Smith, M,. Albanese, F. and Truder, J. (2014) *A roof over my head. The final report of the sustain project*. London: Crisis/Shelter.

Social Care Institute for Excellence (2018) *A rapid evidence assessment of what works in homelessness services*. London: Social Care Institute for Excellence.

Social Exclusion Unit (1998) *Rough Sleeping*, London: Cabinet Office.

Social Exclusion Unit (2002) *Reducing re-offending by ex-prisoners*. London: Office of the Deputy Prime Minister.

Social Security Advisory Committee (2014) *The Housing Benefit (Habitual Residence) Amendment Regulations 2014 (S.I. 2014 No. 539)*. https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/376102/HB-Habitual-Residence-Amendment-Regs-2014-SSAC-report.pdf

St Basil's (2015) *Developing Positive Pathways to Adulthood*. Birmingham.

St Mungo's (2009) *Down and Out? The Final Report of St Mungo's Call 4 Evidence: Mental Health and Street Homelessness*. London: St Mungo's.

St Mungo's (2016) *Nowhere safe to stay: the dangers of sleeping rough*. London: St Mungo's.

St Mungo's (2016) *Stop the scandal: an investigation into mental health and rough sleeping (summary- February)*. London: St Mungo's.

St Mungo's (2018), 'Save hostels, rebuild lives', https://www.mungos.org/get-involved/campaign-for-change/save-hostels-rebuild-lives/

Stefancic, A. and Tsemberis, S. (2007) 'Housing First for Long-Term Shelter Dwellers with Psychiatric Disabilities in a Suburban County: Four Year Study of Housing Access and Retention' in *The Journal of Primary Prevention* 28(3-4):265-79.

Stein. M. and Morris, M. (2010) *Increasing the Number of Care Leavers in 'Settled, Safe Accommodation*, London: C4EO.

StepChange (2017) *Held Back by Debt: how Britain's lack of financial resilience is tipping people into a debt trap*. London: StepChange Debt Charity.

Stephens, M. Perry, J., Wilcox, S. Williams, P. and Young, G. (2018) *2018 UK Housing Review*. England/Scotland: Chartered Institute of Housing and Heriot-Watt University.

Stirling, T., Humphreys, C. (2017) *Housing: Necessary but not sufficient. A regional perspective*. http://www.conwy.gov.uk/en/Resident/Housing/Advice-and-Support/assets/documents/Researching-Support-Services-for-People-Leaving-Prison-in-North-Wales-Final-Report.pdf

Stuckler, D. and Basu, S. (2013) *The Body Economic: Why Austerity Kills*. New York: Basic Books.

Taylor, D. (2017) 'Charities referring rough sleepers to immigration enforcement teams', *The Guardian*, 7th March: https://www.theguardian.com/society/2017/mar/07/charities-giving-home-office-details-of-rough-sleepers-says-report

Taylor-Gooby, P. and Taylor, E. (2016) *Benefits and Welfare: Long-term trends or short-term reactions?* London: Natcen.

Teixeira, L. and Sanders, B. (2012) *No Room Available: a study of the availability of shared accommodation*. London: Crisis.

Teixeira, L., Russell, D. and Hobbs, T. (2018) *The SHARE framework: a smarter way to end homelessness*. London: Centre for Homelessness Impact. https://uploads-ssl.webflow.com/59f07e67422cdf0001904c14/5af4288fdebbda9d1a495a98_SHARE-framework_report_2018.pdf

The AIRE Centre (2017) 'EEA Rough Sleeper Policy Challenge', *The AIRE Centre Press Release*, 14th December: http://www.airecentre.org/news.php/293/eea-rough-sleeper-policy-challenge-press-release

The Bach Commission (2017) *The right to justice: The final report of the Bach Commission*. London: Fabian Society.

The Bureau of Investigative Journalism (2018) *'Every week this winter two people died rough sleeping'*. 23rd April. https://www.thebureauinvestigates.com/stories/2018-04-23/every-week-this-winter-two-people-died-sleeping-rough

The Geelong Project (2018) *Homepage*, http://www.thegeelongproject.com.au

The Ministry for Housing, Communities and Local Government (2018) *Live Tables on Homelessness, Table 774*. London: The Ministry for Housing, Communities and Local Government.

The Ministry of Housing, Communities and Local Government (2018) *Rough sleeping in England: autumn 2017.* https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017.

The National Audit Office (2017) *Homelessness, HC 308, Session 2017-2019*, 13th September. https://www.nao. org.uk/wp-content/uploads/2017/09/Homelessness.pdf

The Royal British Legion (no date) *UK Veterans and Homelessness*. London: Royal British Legion https://media.britishlegion.org.uk/Media/2283/litrev_ukvetshomelessness.pdf

The Scottish Government (2016) *Housing and Reoffending: Supporting people who serve short-term sentences to secure and sustain stable accommodation on liberation*. Edinburgh: The Scottish Government.

The Supporting People Programme (2012) *Research Paper 12/40*, London: House of Commons Library.

Thomas, B. (2012) *Homelessness kills: An analysis of the mortality of homeless people in early twenty-first century England*. London: Crisis.

Tinson, A., Ayrton, C., Barker, K., Barry Born, T., Aldridge, H., Kenwayl, P. (2016) *Monitoring Poverty & Social Exclusion 2016*. York: Joseph Rowntree Foundation.

Toro, P.A., Tompsett, C.J., Philippot, P., Nachtergael, H., Galand, B., Schlienz, N., Stammel, N., Yabar, Y., Blume, M., MacKay, L. and Harbey, K. (2007) 'Homelessness in Europe and the United States: a comparison of prevalence and public opinion', *Journal of Social Issues*, 63(3): 505-524.

Town and Country Planning Association and Nationwide Foundation (2017) *How can councils secure the delivery of more affordable homes? New models, partnerships and innovations*. England: TCPA and Nationwide. https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=84887d6c-08a1-4df4-b72b-0f3e56e212b4

Trussell Trust (2017) *Foodbank demand soars across the UK*. London: Trussell Trust. https://www.trusselltrust.org/2017/11/07/foodbank-demand-soars-across-uk/

Turley, H., Scullion, L. and Brown, P. (2014) *No Second Night Out Greater Manchester and Street Buddies. An Evaluation for Riverside Salford*. Salford: University of Salford.

Turner, A. Albanese, T. and Pakeman, K. (2017) Discerning 'Functional And Absolute Zero': Defining and Measuring an End To Homelessness In Canada in *School of Public Policy*, University of Calgary. Vol. 10 Issue 2

UK Government (2016) *Keep On Caring: Supporting Young People from Care to Independence*. London: HM Government.

UK Statistics Authority (2015), *Statistics on Homelessness and Rough Sleeping in England,* London: UK Statistics Authority.

Royal British Legion (2008) *UK Literature review: UK veterans and homelessness Executive Summary*. https://media. britishlegion.org.uk/ Media/2283/litrev_ukvetshomelessness.pdf

Unison (2012) *Environmental Health: how cuts are putting individuals and communities at risk and damaging local businesses and economies*. London: Unison.

University of York (2016) *What is welfare conditionality?* York: University of York. http://www.welfareconditionality.ac.uk/about-our-research/what-is-welfareconditionality/

Urwin, P., Gould, M. and Faggio, G. (2016) *Estimating the Value of Discounted Rental Accommodation for London's 'Squeezed' Key Workers Centre for Employment Research (CER)*, London: University of Westminster. http://dolphinliving.com/wp-content/uploads/FINAL-Estimating-the-Value-of-Discounted-Rental-Accommodation-2016.pdf

Volmert, A,. Gerstein Pineau, M. and Kendall-Taylor, N. (2016) *Talking about Poverty How Experts and the Public Understand Poverty in the United Kingdom*. Washington: Frameworks Institute. http://frameworksinstitute.org/assets/files/PDF/JRF_UK_Poverty_MTG_2016.pdf

Wales Audit Office (2018) *How local government manages demand – homelessness*. Cardiff: Wales Audit Office. http://www.audit.wales/system/files/publications/local-government-homelessness-2017-english.pdf

Watts. B, Johnsen, S., and Sosenko, F. (2015) *Youth Homelessness in the UK*. Edinburgh: Heriot-Watt University.

Welsh Assembly (2015) *National pathway for homelessness services to children, young people and adults in the secure estate*. http://gov.wales/topics/housing-and-regeneration/services-and-support/homelessness/national-pathway/?lang=en

Welsh Government (2008) *Living in Wales 2008*. Cardiff: Welsh Government.

Welsh Government (2013) *Standards for Improving the Health and Wellbeing of Homeless People and Specific Vulnerable Groups*. Cardiff: Welsh Government.

Welsh Assembly (2013) *Statement Introduction of the Housing Bill*. Record of Proceedings, 14:36. 19th November: http://www.assembly.wales/en/bus-home/pages/rop.aspx?meetingid=185#C111007

Welsh Government (2015) *Houses into Homes Evaluation – Final Report*. Cardiff: Welsh Government. https://gov.wales/docs/caecd/research/2015/151029-houses-into-homes-final-en.pdf

Welsh Government (2016) *£30 million and new housing supply pact to deliver 20,000 homes*. 1st December. https://gov.wales/newsroom/housing-and-regeneration/2016/30-million-and-new-housing-supply-pact-to-deliver-20000-homes/?lang=en

Welsh Government (2017) *National Rough Sleeper Count*. Cardiff: Welsh Government. http://gov.wales/statistics-andresearch/national-rough-sleeping-count/?lang=en

Welsh Government (2017) *Supporting People data linking project*. Cardiff: Welsh Government. https://gov.wales/statistics-and-research/supporting-people-data-linking-project/?lang=en

Welsh Government (2018) *Housing Supply*. Cardiff: Welsh Government. http://gov.wales/topics/housing-andregeneration/housing-supply/?lang=en

Welsh Government (2018) *Review of affordable housing supply in Wales announced by Minister* https://gov.wales/newsroom/housing-and-regeneration/2018/180423-review-of-affordable-housing-supply-in-wales-announced-by-minister/?lang=en

Welsh Government (2018) *Statistical first release: National rough sleeper count, November 2017*. Cardiff: Welsh Government. https://statswales.gov.wales/Catalogue/Housing/Homelessness/Rough-Sleepers/roughsleepers-by-localauthority

Welsh Government (unpublished, 2015) *National Rough Sleeping Count, Wales, November 2014*. Cardiff: Welsh Government.

Wilcox, S., Perry, J., Stephens, M., and Williams, P. (2017) *UK Housing Review*. Coventry: Chartered Institute of Housing.

Williams, K., Poyser, J., and Hopkins K. (2012) *Accommodation, homelessness and reoffending of prisoners: Results from the Surveying Prisoner Crime Reduction (SPCR) survey*, London: Ministry of Justice.

Wilson, W. (2014) *Housing Benefit: Shared Accommodation Rate*. London: House of Commons Library.

Wilson, W. (2017) *Discretionary Housing Payments*. London: House of Commons Library.

Wilson, W. (2018) *Rough Sleeping (England)*. London: House of Commons Libray Briefing Paper http://researchbriefings.files.parliament.uk/documents/SN02007/SN02007.pdf

Wilson, W. and Barton, C. (2017) *Local Housing Allowance caps and the social rented sector*. London: House of Commons Library.

Wilson, W. and Barton, C. (2018) *Introducing a voluntary right to buy for housing association tenants in England*. London: House of Commons Library.

Wilson, W., Barton, C., and Keen, R. (2016) *Housing Benefit measures announced since 2010*. London: House of Commons Library.

Women's Aid (2016) *Meeting the Needs of Women and Children, Annual Survey*, Bristol: Women's Aid Federation of England.

Woodhall-Melnik, J. R. & Dunn, J. R. (2016), 'A systematic review of outcomes associated with participation in Housing First programs', *Housing Studies*, 31(3), pp. 287–304.

Work and Pensions Committee (2017). *Benefit cap "starting to bite" across Britain* https://www.parliament.uk/business/committees/committees-a-z/commons-select/work-and-pensions-committee/news-parliament-2015/benefit-cap-evidence-16-17/

Y Foundation (2017) *A Home of Your Own Housing First and ending homelessness in Finland*. Keuruu: Otava Book Printing Ltd.

YMCA St Paul's Group (2018) *Y:Cube*. https://ymcastpaulsgroup.org/home/our-services/accommodation/y-cube/

Youde, K. (2017) Shared housing: the solution, in *Inside Housing. 3rd August.* https://www.insidehousing.co.uk/insight/insight/shared-housing-the-solution-51720

Young, G. and Donohoe, T. (2018) *Review of Strategic Investment Plans for Affordable Housing*. Scotland: SFHA/Equality and Human Rights Commission/ Shelter Scotland https://scotland.shelter.org.uk/__data/assets/pdf_file/0005/1488560/Shelter_AffordableHousingReport_Feb18.pdf/_nocache

Zaretzky, K. and Flatau, P. (2013) *The cost of homelessness and the net benefit of homelessness programs: a national study*, AHURI Final Report No. 218, Australian Housing and Urban Research Institute Limited, Melbourne, https://www.ahuri.edu.au/research/final-reports/218.

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