

Making homelessness strategies happen: ensuring accountability and deliverability

Advice for local housing authorities

Local Government Association

The Local Government Association (LGA) is the national voice of local government. The LGA are a politically-led, cross party membership organisation, representing councils from England and Wales. The LGA's role is to support, promote and improve local government, and raise national awareness of the work of councils. The LGA's ultimate ambition is to support councils to deliver local solutions to national problems.

Neil Morland & Co

Neil Morland & Co (NM&Co) are housing consultants. Formed in 2011, NM&Co work throughout England, Scotland and Wales with local authorities, housing associations, voluntary organisations and others. NM&Co's ambition is to reduce housing inequalities by improving social policies. NM&Co uses authoritative evidence and their unique expertise, to create better outcomes for people in housing need.

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Disclaimers

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Executive summary

The Homelessness Act 2002 requires local housing authorities to take strategic responsibility for tackling and preventing homelessness.

The Ministry of Housing, Communities & Local Government (MHCLG) has pledged to increase scrutiny of local housing authorities' homelessness strategies, and in August 2019, the Homelessness Advice & Support Team requested all local housing authorities submit their homelessness strategy no later than 31 December 2019.

A homelessness strategy should be a single plan for all local agencies to concentrate their activities for tackling homelessness.

Local housing authorities should be assisted by social services authorities and have the co-operation of private registered providers of social housing, to fulfil homelessness strategy duties. Other agencies should also make contributions.

A review of homelessness must be completed to evaluate the current picture of homelessness in a local housing authority area. Following which, a homelessness strategy must be formulated. This must concentrate on:

- levels of homelessness
- preventing homelessness
- securing accommodation
- providing support
- resources.

Local housing authorities must consider the statutory guidance on homelessness strategies. The objectives of a local housing allocations scheme and tenancy strategy should be cross referenced when formulating a homelessness strategy.

A homelessness strategy must be published at least every five years. Local housing authorities must carry out consultation on the objectives and actions of the homelessness strategy it intends to publish.

Examples of (i) job descriptions for the post of homelessness strategy officer, (ii) homelessness strategy action plan, plus (iii) terms of reference for a homelessness strategy steering group are included in this guide. We have also included a homelessness strategy self-assessment checklist that local housing authorities can use to carry out their own evaluation of their homelessness review, strategy and action plan.

About this guide

The Local Government Association (LGA) commissioned this guidance to offer advice and promote good practice for local authorities, in the drafting and issuing of homelessness strategies, in line with the measures set out in the the Government's Rough Sleeping Strategy.

This guidance sets out the current legal obligations on local housing authorities relating to homelessness strategies. The guidance also contains good practice (including case studies) on:

- the formulation of homelessness strategies, including;
 - formulating the evidence basis for a local strategy
 - involving other public and voluntary sector stakeholders in the formulation of homelessness strategies
 - involving people with experience of homelessness in the formulation of strategies
 - linking homelessness strategies to other relevant strategies, including housing, health, and rough sleeping
- the delivery and evaluation of homelessness strategies, including;
 - governance arrangements for monitoring and steering a homelessness strategy's delivery
 - transparency and communication of strategies
 - involving other public authorities in the delivery of homelessness strategies
 - suggested criterion or standards for the evaluation of homelessness strategies

- the formulation and delivery of local action plans.

The guidance has been devised following a combination of desktop research, conversations with councils, partners, and Government. This has culminated in setting out the good practice found in this guidance.

This guidance provides straightforward, reliable and authoritative examples of practice, to local government officers (at any level) and elected councillors, to aid making homelessness strategies happen.

Homelessness strategies – contextual factors

Legislative context

MHCLG is the department of Government that is responsible for making homelessness policy for England. The devolved administrations for Northern Ireland, Scotland and Wales are responsible for such matters in their nations.

The responsibility for housing policy for Greater London,¹ has been devolved to the Mayor of London and the Greater London Authority.

The Homelessness Act 2002 places a duty on English local housing authorities, to formulate a homelessness strategy at least every five years. A review of homelessness in a local housing authority area must take place prior to a homelessness strategy being formulated and published. The legislation requires local housing authorities to take strategic responsibility for tackling and preventing homelessness in their local authority area. This duty complements other duties local housing authorities have to advise and assist persons who are homeless or threatened with homelessness.

The Local Authorities' Plans and Strategies (Disapplication) Order 2005, exempted, for a period of one or two years, a local authority which had been classified as being of an excellent standard, from the duty to formulate a homelessness strategy. This rule was reversed by the Local Audit and Accountability Act 2014, meaning since 2017, all local housing authorities must comply with the duties arising from the Homelessness Act 2002.

¹ Greater London Authority Act 2007, Part 6 Housing, Part 7A Housing

Policy context

MHCLG has pledged to increase scrutiny of local housing authorities, as part of a wider array of efforts to prevent rough sleeping. MHCLG published a Rough Sleeping Strategy,² plus an associated delivery plan,³ in 2018. The strategy sets out an ambition to end rough sleeping by 2027. A series of actions are grouped together under three objectives – prevention, intervention and recovery.

Section 71 of the Rough Sleeping Strategy commits MHCLG to work with the LGA, to support local housing authorities to:

- update local homelessness strategies and rename existing local homelessness strategies to 'homelessness and rough sleeping strategies'
- ensure all strategies are available online and submit all strategies to MHCLG
- account for the steps taken to deliver local strategies and re-publish annually the strategy action plan.

Section 73 of the same strategy proposed that MHCLG undertake a consultation with local housing authorities on establishing Homelessness Reduction Boards. MHCLG sought views on how local and national government could improve local accountability for the delivery of homelessness services, from February – May 2019.

² Rough Sleeping Strategy, Ministry of Housing, Communities & Local Government, 2018, Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733421/Rough-Sleeping-Strategy_WEB.pdf

³ Rough Sleeping Strategy: delivery plan, Ministry of Housing, Communities & Local Government, 2018, Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/762854/RSS_delivery_plan.pdf

The consultation concentrated on:

- the effectiveness of existing accountability arrangements
- the concept of Homelessness Reductions Boards
- other ways of supporting effective partnership working.

MHCLG is currently analysing the feedback and will publish the outcomes in due course.

In August 2019, MHCLG requested all local housing authorities submit their homelessness strategy to the Homelessness Advice & Support Team no later than 31 December 2019.

Set out below are detailed considerations for how the commitments made by MHCLG and LGA in their Rough Sleeping Strategy can be put into practice by local housing authorities.

Updating local homelessness strategies

Local housing authorities have discretion to carry out a homelessness review and re-publish a homelessness strategy as often as they wish to, providing they do so at least every five years. A parliamentary select committee previously recommended that homelessness strategies be updated every two or three years.⁴ Many local authorities have kept to a five-year cycle first started in 2003, publishing new strategies in 2008, 2013, and 2018. However, others have departed from this cycle. For example, some local authorities that underwent local government reorganisation in 2009, chose to make only minor amendments to local homelessness strategies in 2008, and instead undertook a more significant update in 2009, to coincide with new local government arrangements. A recent analysis showed only 68 per cent of English local housing authorities had an up-to-date homelessness strategy.⁵

This guidance recommends that local housing authorities focus on updating their strategies every five years, and that central government enables them to do so.

4 Homelessness Third Report of Session 2004-05 Volume 1 – report, House of Commons ODPM: Housing, Planning, Local Government, and the Regions Committee, 2005.

5 Heselwood, L., Farhan, I., Shilson-Thomas, A. (2019) Preventing youth homelessness: An assessment of local approaches. Reform London.

This time period allows for a sufficient amount of medium-term data to accumulate, enabling a substantive amount of qualitative and quantitative evidence to be analysed.

Re-naming existing local homelessness strategies to ‘homelessness and rough sleeping strategies’

Section 4 of the Homelessness Act 2002 requires that homelessness strategies tackle all forms of homelessness that are defined in law, which encompasses rough sleeping. In addition to people who have no accommodation (eg people experiencing street homelessness), homelessness strategies must help those who:

- have accommodation, but none available to them
- have accommodation, but no entitlement to occupy it
- have accommodation, but are unable to enter it
- have accommodation, but it is not reasonable to continue to occupy it, having taken in to account the local housing market
- have accommodation, but there is a threat this will become unavailable within the next 56 days
- have accommodation, but have been served a valid section 21 notice.

This suggests that all types of persons and forms of homelessness should be equally prioritised in homelessness strategies. However, local need may have an influence, and it is typical that local housing authorities with high levels of rough sleeping are already suitably prioritising the issue of rough sleeping in their homelessness strategies.

Rough sleeping is the most visible form of homelessness, and is likely to be particularly harmful for those experiencing it.⁶

6 www.crisis.org.uk/ending-homelessness/rough-sleeping/rough-sleepers-and-complex-needs/

However, it is not the most common form of homelessness, with those experiencing hidden homelessness forecast to be up to 12 times greater than those experiencing street homelessness.⁷ One-fifth of people who experience homelessness are aged 18-24 years,⁸ a greater number than those sleeping rough. Women are more likely to be homeless than men,⁹ and in greater numbers than those sleeping rough. People of BAME (black, Asian and minority ethnic) origin account for almost one-third of people experiencing homelessness,¹⁰ a greater number than those sleeping rough.

Local authorities should ensure that local and national homelessness context is the primary driver for how different groups of homeless people and forms of homelessness are prioritised in their strategies.

Ensuring homelessness strategies are available online

Currently, both homelessness reviews and homelessness strategies must be freely available at a local authority town hall for everyone to look at, with a printed copy provided to anyone who requests one (subject to an acceptable discretionary fee being paid to the local housing authority). Notwithstanding this, many local housing authorities already publish their homelessness review and homelessness strategy online. However, recent research¹¹ indicates that this may not always be the case.

Whilst it isn't a legal requirement to publish homelessness strategies online, doing so may make it easier for local housing authorities to

fulfil their obligations towards members of the public.

Submitting homelessness strategies to MHCLG

When homelessness strategies were first published in 2003, local housing authorities were asked to submit their publications to the then Office of the Deputy Prime Minister for an independent evaluation.¹² Subsequently, homelessness strategies haven't been called in by the Government. MHCLG is proposing that in future all homelessness strategies be submitted for scrutiny by the department.¹³

It's important to note that MHCLG currently has no power to reject a homelessness strategy submitted by a local housing authority. Responsibility for homelessness strategy has already been devolved to the Mayor of London and the Greater London Authority, meaning London boroughs might need to submit their strategies to City Hall, rather than MHCLG. No similar arrangements exist for combined authorities, with this new tier of government having no duties or powers pertaining to homelessness, despite many elected mayors being charged with leading homelessness programmes, such as the 'Housing First' pilots.

Local authorities should take steps to assure themselves of the quality of their homelessness strategies, and this guide includes a checklist for self-assessment (see appendix two).

Accounting for the steps taken to deliver homelessness strategies

The Homelessness Act 2002 already requires local housing authorities to monitor and revise their homelessness strategy as necessary.

Elected member scrutiny is a key way for local housing authorities to ensure that they are delivering progress. Elected councillors should scrutinise homelessness strategy action plans annually, having oversight of the actions that were achieved during the

7 Hidden homelessness in London, London Assembly Housing Committee

8 Live tables on homelessness, initial assessments tables, Age of main applicants owed a prevention or relief duty, October – December 2018, Ministry of Housing, Communities & Local Government, May 2019

9 Live tables on homelessness, initial assessments tables, Household type at time of application for households owed a prevention or relief duty, October – December 2018, Ministry of Housing, Communities & Local Government, May 2019

10 Live tables on homelessness, Table 771: Ethnicity of households accepted by local authorities as owed a main homelessness duty, January – March 2018, Ministry of Housing, Communities & Local Government, May 2019

11 Heselwood, L., Farhan, I., Shilson-Thomas, A. (2019) Preventing youth homelessness: An assessment of local approaches. Reform London

12 Housing Quality Network (2004), Local Authorities' Homelessness Strategies, Evaluation and Good Practice Guide. Office of the Deputy Prime Minister. London

13 Rough Sleeping Strategy, Ministry of Housing Communities and Local Government, 2018

previous year, plus the activities intended for the year ahead. This scrutiny could be carried out by a dedicated committee, or by the council's cabinet. It could also extend to social services authorities, as adult and children social care services are obliged to assist with the undertaking of homelessness strategy duties. This extends to homelessness strategies including objectives and actions to be accomplished by adult and children social care services, in addition to those by local housing authorities.

It would also be helpful for local authorities to involve housing association board members in scrutiny, as social landlords have a regulatory obligation to assist local authorities in the discharge of their strategic housing functions.

The position of a named homelessness strategy officer is also key to ensuring accountability, as they would be responsible for the oversight of homelessness strategies and driving forward progress towards local ambitions for tackling homelessness.

This guide includes a job description for a homelessness strategy officer, to use should local housing authorities see fit to adopt such a post for their council (see appendix three).

Republish homelessness strategy action plan annually

The Homelessness Act 2002 already requires local housing authorities to republish homelessness strategies following any revisions that are made. Logically this would include associated action plans.

Many local housing authorities already update their strategy action plan each year, showing the actions that were achieved during the previous year, plus the activities intended to for the year ahead, but not all.

This guide includes an example action plan template for local housing authorities to reference when formulating their own actions plans (see appendix four).

Action where local housing authorities fail to comply

Unspecified action is promised in circumstances where local authorities fail to comply with MHCLG's intended reforms for homelessness strategies.

Unlike Scotland, where the regulator for social housing can take enforcement action against local housing authorities in respect of how homelessness functions are administered, no such similar body exists in England.

Instead, MHCLG's team of local government practitioners (The Homelessness Advice & Support Team), provide advice and support to local housing authorities about how best to administer homelessness functions, and are a useful resource.

Homelessness Reduction Boards

There is nothing in law that currently prescribes to local housing authorities, the specific fora that should be in place locally to coordinate homelessness activities.

Only a limited number of public bodies have a duty to assist local housing authorities with the delivery of a homelessness strategy (adult and child social care, plus private registered providers of social housing). Some public authorities have a duty to refer cases of homelessness, but this doesn't extend to co-operating with formulating and delivering homelessness strategies. Some other public sector professionals, for example directors of public health and police and crime commissioners, have no homelessness duties whatsoever. Homelessness forums are not currently established in law.

Nevertheless, most areas already have some sort of homelessness forums, many of which work well to bring together partners to address local issues and deliver specific elements of homelessness strategies. Forums' success often depends on a number of factors such as the personal commitment of the individuals who attend, the effectiveness of how well these fora are administered, and the priorities of various partners involved – as a result, their success can vary.

Homelessness Reduction Boards, if established, could be an opportunity to increase the commitment of a variety of public bodies to the delivery of a local homelessness strategy. This guide includes an example terms of reference for a group to steer the delivery of a homelessness strategy, for local housing authorities to reference when making their own arrangements (see appendix five).

Homelessness strategies – administering the legal requirements

Why do homelessness strategies need to happen?

The intention of the Homelessness Act 2002 is to ensure local housing authorities take a strategic approach to tackling homelessness. It was the intention of ministers who sponsored the Homelessness Act 2002 that homelessness strategies should lead to:¹⁴

- stronger protection to vulnerable families and individuals
- more effective services to help people who are homeless and prevent homelessness
- tackle causes of all forms of homelessness
- all key bodies being involved with tackling homelessness
- close co-operation between local housing authorities, social services authorities and health authorities, to evidencing need and resourcing services
- private registered providers of social housing, voluntary organisations and public authorities having key roles in tackling homelessness.

Based on the above ambitions, it's clear that a homelessness strategy should be a single plan for all local agencies to concentrate their activities for tackling homelessness, over a medium-long term. A homelessness strategy should include actions to assist people of all characteristics and circumstances who are at risk of homelessness. Successful delivery of homelessness strategies will involve joint commissioning to achieve shared outcomes around tackling homelessness.

¹⁴ Hansard HC Deb 02 July 2001 Vol 371 cc33-114

Who makes homelessness strategies happen?

The following parties should contribute to homelessness reviews and strategies:

- local housing authorities
- social services authorities
- private registered providers of social housing
- public authorities
- voluntary organisations
- others.

Representation from these bodies should be at a sufficiently senior level of responsibility that affords decision making powers, especially in respect of policy and budgets.

Where any of the above bodies operate across multiple local housing authority areas, sensible arrangements should be in place to ensure reasonable input can be made into all homelessness strategies throughout the region they cover.

Local housing authorities

All local housing authorities¹⁵ are obliged to oversee a homelessness strategy for their area. This extends to:

- district councils
- metropolitan councils
- unitary councils
- London borough councils
- Common Council of the City of London
- Council of the Isles of Scilly.

¹⁵ Housing Act 1985, Section 1

Forms of local government that are not considered to be a local housing authority are civil parishes, county councils and combined authorities.

Local housing authorities that provide landlord services should expect reasonable assistance from employees involved in the administration of such functions, especially those relating to the allocation of social rented housing, plus the issuing and ending of tenancies, in relation to working towards objectives, and the accomplishment of actions, included in a homelessness strategy.

A local housing authority can seek reasonable assistance from one or more neighbouring local housing authority, in relation to working towards objectives, and the accomplishment of actions, included within a homelessness strategy. Two or more local housing authorities can choose to cooperate to carry out a joint homelessness review, plus formulate and publish a shared homelessness strategy.

An advantage of councils adopting a common homelessness strategy, is that many bodies that local housing authorities would wish to work together with, operate across more than one local housing authority area. This is particularly true of two-tier areas where there are both district and county councils. Often the causes of, and solutions to, homelessness are similar across neighbouring local authority areas, meaning action taken across a more extensive geography, or with a larger cohort of people, can create better public value from the delivery of homelessness strategies. An example of a countywide homelessness strategy is the Worcestershire Strategic Direction for Tackling Homelessness.¹⁶

Social services authorities (adult and child social care)

Social services authorities must give local housing authorities reasonable assistance to:

- carry out a homelessness review
- formulate a homelessness strategy
- work towards objectives and accomplish actions included in a homelessness strategy.

Social services authorities are those councils charged with administering social services functions to adults' and children,¹⁷ such as shire county councils, metropolitan councils, unitary councils, London borough councils, and others.

Common practice is for adult and child social care functions to be administered separately. Many local authorities operate a single directorate of children services, encompassing social care, education and other matters. Increasingly, adult social care services are operating in partnership with NHS Trusts to provide an integrated system of care and health services.

Whatever form of local arrangements might be in place to administer social service functions for adults and children, suitable input should be made towards making homelessness strategies happen in the local housing authority districts that are within, or co-terminus with, their social service authority boundaries.

Involvement from adult and child social care services can be cemented by adopting common policies and procedures that promote joint action to prevent homelessness, secure accommodation and provide support. The development and delivery of a homelessness strategy provides an ideal opportunity to create consistent routes for establishing entitlement to care and support for vulnerable adults, assisting children aged 16 and 17 who are homeless or threatened with homelessness, and providing help to young adults leaving the care of a local authority.

¹⁶ www.bromsgrove.gov.uk/media/4369000/Worcestershires-Strategic-Direction-for-Tackling-Homelessness-2018-2021.pdf

¹⁷ Local Authority Social Services Act 1970, Schedule 1

Some examples of practice can be found in the examples below:

- Care Act Multiple Needs toolkit, Voices of Stoke¹⁸
- Developing Positive Pathways to Adulthood, St Basil's¹⁹
- Care Leavers Accommodation and Support framework, Barnardo's & St Basil's²⁰

Good practice – social services authorities (adults and children)

Prior to carrying out a homelessness review or formulating a homelessness strategy, local housing authorities and social services authorities should agree key principles for working together throughout the process of publishing a new homelessness strategy. Key features of partnership working are sustainability, flexibility, accountability, and pragmatism.²¹

Local housing authorities should actively foster participation from social services authorities with formulating a homelessness strategy. This will need to involve local government officials in building a consensus for what the aims of a new homelessness strategy might be.

Local housing authorities and social services authorities will need to adapt to the changing conditions that new legislation (eg Care Act 2014, Homelessness Reduction Act 2017) has brought to the duties they are obliged to administer. This will have expanded responsibilities and might have resulted in increased workloads.

Notwithstanding the above, there should be an emphasis, from both local housing authorities and social services authorities, on getting on with completing a homelessness review, and publishing a new homelessness strategy.

There should be an emphasis, from both local housing authorities and social services authorities, on having accountable structures overseeing the process of carrying out a homelessness review and formulating a homelessness strategy. Key roles should be assigned to officers from both types of authorities, with procedures put in place to ensure a new homelessness strategy is published in orderly manner.

Private registered providers of social housing (housing associations)

Private registered providers of social housing must give local housing authorities reasonable assistance with homelessness duties,²² this extends to working towards objectives, and the accomplishment of actions, included in a homelessness strategy.²³

Homes for Cathy,²⁴ a sector-led initiative supported by the sector membership body, the National Housing Federation, promotes nine standards that private registered providers of social housing should aspire to achieve, by way of demonstrating co-operation in tackling homelessness.²⁵ Contributing to the formulation and delivery of a local homelessness strategy is the first of the commitments.

The National Housing Federation²⁶ is a membership organisation for private registered providers of social housing, which holds a range of materials about the role housing associations can play to tackle homelessness. In particular, the National Housing Federation has developed a housing association offer on the duty to refer called the 'commitment to refer'. This is a voluntary commitment that a housing association will refer an individual or household to a local authority if they are homeless or at risk of homelessness.²⁷

18 www.homeless.org.uk/sites/default/files/site-attachments/VOICES%20Care%20Act%20Toolkit.pdf

19 https://stbasils.org.uk/files/2015-08-35/10_FINAL_pathwaysA4_booklet_98812.pdf

20 www.barnardos.org.uk/care_leavers_accom_and_support_framework.pdf

21 Newman, J. (2006) 'Joined-up government: the politics of partnership Making Policy Happen, chapter 16 Routledge

22 Housing Act 1996, Part 7, section 213

23 Tenancy Standard, Regulator of Social Housing, April 2012

24 <https://homesforcathy.org.uk>

25 <https://homesforcathy.files.wordpress.com/2018/07/commitments-one-pager.pdf>

26 www.housing.org.uk

27 www.housing.org.uk/topics/welfare-reform/homelessness/commitment-to-refer/

CASE STUDY

Eden Housing Association

Eden Housing Association, a provider of social housing located in Cumbria, was formed in 1997, to receive a large-scale voluntary transfer of social rented housing from Eden District Council.

Eden Housing Association holds a contract to administer public law homelessness functions on behalf of Eden District Council. A recent independent review has found that Eden Housing Association has a strong service offer. Eden Housing Association has a view that there is a natural alignment between their core business of being a provider of social housing, and providing housing advice services, as both activities are about making sure that people can get their housing needs met.

When the local housing authority recently carried out a homelessness review, Eden Housing Association proactively cooperated with providing information about the levels of homelessness. Eden Housing Association was able to give examples of activities carried out to prevent homelessness, offer accommodation to those who are homeless, and support people to stop a recurrence of homelessness.

These activities extended well beyond those it was contracted to undertake on behalf of the local housing authority. Tackling and preventing homelessness has been embedded in the core of the business. There is corporate oversight on how well the association is tackling homelessness, and investment from the organisation into initiatives for tackling homelessness. Eden Housing Association has arrangements for joint delivery of services with the local housing authority, the social service authority and other housing associations. Eden Housing Association makes a higher than average percentage of lettings to homelessness households and makes use of its own stock for temporary accommodation.

Eden Housing Association supports local voluntary organisations, such as the food bank, to ensure those at risk of homelessness can benefit from help with meeting basic needs.

Throughout the duration of the homelessness review, Eden Housing Association volunteered to sit on the homelessness review steering group and acted as secretary for this body, including hosting all meetings at their offices. Eden Housing Association also recruited people who have experienced homelessness, to be consulted about their views on what works and what should be a priority in the future.

For further information contact Stella Eggleston, Housing Options Manager, Eden Housing Association, by emailing etella.eggleston@edenha.org.uk

Public authorities

Any public authority can agree to work towards objectives, and the accomplishment of actions, included in a homelessness strategy.

Public authorities that have a duty to refer cases of homelessness, are essential to making homelessness strategies happen. Such bodies can include:

- prisons
- youth offender institutions
- secure training centres and secure colleges
- National Probation Service and Community Rehabilitation Companies
- Jobcentre Plus
- NHS Trusts and NHS Foundations Trusts
- Ministry of Defence.

Involvement from these bodies can be cemented by adopting common policies and procedures that promote joint action to prevent homelessness, secure accommodation and provide support. The development and delivery of a homelessness strategy, provides an ideal opportunity to

create consistent routes to assist people leaving institutional environments. Some examples of practice can be found by clicking on the links below:

- prison release protocol research (MHCLG and Ministry of Justice)²⁸
- Homelessness Prevention Pilot with Jobcentre Plus (Newcastle City Council)²⁹
- Cornwall homeless patient hospital discharge service (Cornwall Council)³⁰
- Housing Pathway: Former Member of the Regular Armed Forces.³¹

Other public authorities will also be able to make valuable contributions to making homelessness strategies happen. Such bodies can include:

- police, fire, ambulance and other emergency services
- community-based mental health services
- child and adolescent mental health services
- sexual health services
- community health visitors
- community midwives
- general practice doctors/surgeries
- substance misuse treatment services
- children's early help services
- children's centres
- Troubled Families programme
- youth services
- housing benefit administrators
- environmental health services
- community safety partnerships and anti-social behaviour teams
- other local authority services

28 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/814964/Prison_Release_Protocol_research_report_FINAL.pdf

29 www.newcastle.gov.uk/sites/default/files/Housing%20and%20homelessness/Homelessness%20Prevention%20Trailblazer/Homelessness%20Prevention%20Pilot%20with%20Jobcentre%20Plus%20-%20report.pdf

30 www.cornwall.gov.uk/media/18785876/homeless-patient-hospital-discharge-project-web.pdf

31 www.wyreforestdc.gov.uk/media/3601322/180208-Housing-Pathway-Armed-Forces.pdf

- any other public authorities that can help make homelessness strategies happen.

Good practice – public health and police and crime commissioners

Public health professionals are encouraged to acknowledge the link between health and homelessness and ensure suitable actions are in place in homelessness strategies.³²

Senior public health professionals are advised to recognise homelessness in Joint Strategic Needs Assessments and Health and Wellbeing Strategies. Police and Crime Commissioner police and crime plans and community safety partnership plans are expected to recognise the relationship between homelessness, health and offending, with this understanding informing local commissioning.

Further information and ideas about how local housing authorities can work with health services, can be found in 'The Impact of Homelessness on Health'³³ guide, published by the LGA.

Voluntary organisations

Any voluntary organisation can agree to work towards objectives, and the accomplishment of actions, included in a homelessness strategy. Such bodies can include:

- welfare assistance services
- advice agencies
- supported housing providers
- Housing First providers
- refuge providers
- armed forces veteran support providers
- street homelessness outreach and assessment providers
- floating support providers
- lesbian, gay, bisexual and transgender support agencies

32 Homelessness: applying All Our Health, Public Health England, November 2018

33 www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF

- faith organisations
- any other voluntary organisations that can help make homelessness strategies happen.

Voluntary organisations are those bodies whose activities are carried out not for profit.³⁴ Whether or not a voluntary organisation is in receipt of a grant or other assistance from a local housing authority to tackle homelessness, is irrelevant for the purposes of such a body being involved making homelessness strategies happen.

Voluntary sector membership bodies, such as Homeless Link, hold research³⁵ evidence and statistical information that can be useful when carrying out a homelessness review and formulating a homelessness strategy.

Others

Any other body or person can agree to work towards objectives, and the accomplishment of actions, included in a homelessness strategy. Such bodies and persons can include:

- schools
- further education colleges
- universities
- private landlords
- National Asylum Support Service accommodation providers
- any other body or person that can help make homelessness strategies happen (eg commercial businesses, members of the public)

people who have experienced homelessness (including those who are homeless at the time a homelessness strategy is being formulated and delivered, plus those who have previously been homeless and those who might be in the future).

How do homelessness strategies happen?

There are two key stages to making a homelessness strategy. Firstly, a review of homelessness in a local authority must be completed, to evaluate the current picture of homelessness in a local housing authority area. Following which, a homelessness strategy must be formulated. A social services authority must assist a local housing authority in undertaking these tasks. All forms of homelessness must be considered in a homelessness review and homelessness strategy. Prior to starting this process, an evaluation could be carried out on a current homelessness strategy, to understand outcomes achieved over the past five years.

Evaluating a homelessness strategy

Local authorities were required to submit the first strategies formulated in 2003, to the then Office of the Deputy Prime Minister. The strategies were evaluated with the findings being published as a good practice advice note, alongside each local authority receiving personalised feedback.³⁶ Findings were concentrated around the themes of reviews, strategies and action plans. Recommendations were made for the then Office of the Deputy Prime Minister, local housing authorities and other bodies.

The MHCLG doesn't have the power to reject a local housing authority homelessness strategy, unlike the Scottish Government's Minister with responsibility for homelessness, who already can take such a course of action.³⁷

³⁴ Housing Act 1996, Part 7, Section 180(3)

³⁵ www.homeless.org.uk/facts-figures

³⁶ Housing Quality Network (2004), Local Authorities' Homelessness Strategies, Evaluation and Good Practice Guide. Office of the Deputy Prime Minister. London

³⁷ Housing (Scotland) Act 2001, Part 1 Homelessness and Allocation of Housing, section 1 Homelessness strategies

Good practice – evaluating a homelessness strategy

Prior to commencing a review of homelessness, or formulating a homelessness strategy, local housing authorities should evaluate the difference made since the previous strategy was published.

Evaluating homelessness strategies ensures accountability of those charged with delivering actions from the homelessness strategy. Key to any evaluation is the impact a strategy has had on people who have experienced homelessness, therefore service user consultation is crucial. An evaluation of a homelessness strategy should also consider any impact made on the local housing authority's own homelessness services, and those provided by others. The number of actions that were accomplished should also be looked at, and what difference this has made in respect of achieving local priorities for tackling homelessness. The allocation of resources to aid the delivery of a strategy will need to be appraised, alongside the overall impact of the strategy, to determine the public value created from delivering the strategy.

Forms of homelessness

The objectives and action of homelessness strategies must cover all forms of homelessness, as defined in law.³⁸ People who are homeless or threatened with homelessness include those who:

- are sleeping rough
- are hidden homelessness (no fixed abode)
- have been illegally evicted
- are living in accommodation that is unaffordable, unfit, overcrowded, are experiencing domestic abuse or threats of domestic abuse, and other exceptional circumstances
- are at risk of becoming homeless due to parents/family/other no longer willing or able to accommodate, leaving care, prison

the armed forces or escaping domestic abuse

- have been served a notice to quit their tenancy by private or social landlord.

A local housing authority with high levels of street homelessness, will understandably wish to prioritise the issue of rough sleeping in their homelessness strategy. Publishing a separate specific rough sleeping strategy, alongside a homelessness strategy that focuses on any other forms of homelessness, is acceptable, but unnecessary as it should be included within a homelessness strategy to avoid two sets of governance and overlapping action plans. There is a risk that some stakeholders buy into a rough sleeping strategy while the main homelessness strategy and steering group gets ignored.

Carrying out a homelessness review

Legislation specifies five key stages to carrying out a homelessness review:

1. reviewing the current and future likely levels of homelessness
2. reviewing activities for preventing homelessness
3. reviewing activities for securing accommodation for people who are homeless or threatened with homelessness
4. reviewing the support available for people who are homeless or threatened with homelessness, or were previously homeless
5. reviewing the resources available to tackle homelessness.

A homelessness review should provide an accurate portrayal of homelessness in a local housing authority area, at the time of a review being completed. The published review is usually a lengthy document containing all the evidence that has been assessed, the conclusions reached and the resulting recommendations that have been made.

³⁸ Housing Act 1996, Part 7, section 175

A homelessness review should have clear findings about:

- what's working well to tackle homelessness
- what's must be done better to tackle homelessness
- what needs to be the future priorities for tackling homelessness.

Current and future likely levels of homelessness

The first step is to analyse the current and future likely levels of homelessness in the local housing authority area. A comparison should be made to neighbouring local housing authorities and/or comparable local housing authorities elsewhere. Benchmarking could also be done using all local authorities from across a region or the whole of England (or all local authorities outside of London). Data should be sought from a wide range of public authorities and voluntary organisations.

MHCLG publishes numerous tables of homelessness data, which can be used to understand the current levels of homelessness.³⁹

The Combined Homelessness and Information Network (CHAIN) has comprehensive rough sleeping data for London boroughs.⁴⁰

Authoritative sources, such as the Office for National Statistics,⁴¹ can be used to forecast future levels of homelessness, by looking at child poverty rates, labour market factors, housing market factors and any other relevant trends.

Local housing authorities typically collect statistics on the current levels of statutory, single and street homelessness. There should also be collection of statistics on hidden homelessness, however this isn't typical. It has been predicted that the levels of hidden homelessness are 13 times higher than street homelessness, with young people, persons who identify as lesbian, gay, bisexual and/or transgender, and those escaping domestic

39 www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness

40 <https://data.london.gov.uk/dataset/chain-reports>

41 www.ons.gov.uk

abuse, being more likely to experience this form of homelessness.⁴²

From April 2018 the Homelessness Case Level Information Collection (H-CLIC) replaced the P1E aggregated data return. Local authorities will wish to analyse statistics from these data sets, to understand trends such as:

- numbers of applications for assistance
- number of decisions made by outcome
- characteristics of people who are homeless or threatened with homelessness
- household size
- support needs assessed
- reason for loss of accommodation
- types of prevention activity
- types of relief activity
- types of decisions made
- types of activities to end the main duty
- assistance received by households with their support needs
- local connection referrals made and received
- number of households living in temporary accommodation (by type)
- length of stay in temporary accommodation
- number and types of reviews requested and decisions made
- nationality of applicants.

Homelessness prevention

Homelessness prevention activity can be divided into five strands,⁴³ to inform the focus of a review:

1. Universal prevention – prevention which is population-wide and seeks to reduce the overall levels of risk (eg ensuring a

42 London Assembly Housing Committee (September 2017), Hidden homelessness in London

43 Typology presented in a working document used by MHCLG to inform Government's Rough sleeping Strategy, 2018. In turn derived from West Midlands Homelessness Taskforce, "Designing out homelessness in the West Midlands", Available at: www.wmca.org.uk/who-we-are/meet-the-mayor/homelessness-task-force/

- sufficient supply of affordable housing and access to that housing; a robust welfare safety net, etc)
2. Targeted prevention – focusing on at risk groups and transition points (eg those leaving institutions)
 3. Pre-crisis prevention – focusing on preventing homelessness when risk is imminent (defined within 56 days in line with the Homelessness Reduction Act 2017)
 4. Emergency prevention – working with those at immediate risk of homelessness (eg that night or similar)
 5. Recovery prevention – focusing on minimising repeat homelessness among those experiencing/who have experienced it (eg housing related support for those rehoused following a period of homelessness).

The MHCLG issued findings from an external evaluation of its £20 million Homelessness Prevention Trailblazer programme, in March 2019.⁴⁴ The findings from this research could be used to inform a local review of prevention activities.

A review of early prevention activities should look at how the duty to provide advisory services.⁴⁵ This could focus on the advice offered by a local housing authority, plus also from other provider of housing advice, for example law centres. Concentrating on the quality, availability/accessibility, and accuracy of the advice provided. This can encompass arrangements for assistance to be available outside of usual working hours.

Many early homelessness prevention activities focus on those most at risk of homelessness. Homelessness legislation⁴⁶ recognises some characteristics and circumstances when a person has a heightened risk of homelessness, such as:

- leaving prison or youth detention accommodation
- leaving care of a children services authority
- regular armed forces veterans
- victims of domestic abuse
- leaving hospital
- experiencing mentally illness.

The above list isn't exhaustive, as many other persons have a heightened risk of homelessness, for example due to being a young adult, a victim of violence or sexual abuse, a victim of harassment, having a drug or alcohol addiction, being a victim of trafficking, or possessing any of the characteristics protected under the Equality Act 2010. A homelessness review could look at local arrangements to provide information, advice and assistance to the above listed persons, to see whether they are fit for purpose. Identification and analysis of joint working protocols, pooled budgets, shared commissioning, and common service delivery arrangements could be carried out.

Also, in relation to early prevention activity, the impact of the 'duty to refer', which came into force from October 2018,⁴⁷ for specified public authorities, could also be reviewed, with an analysis of the effectiveness of local arrangements being carried out.

Duty to refer: an opportunity to co-operate

The LGA published guidance in October 2018, providing local housing authorities and their partners with useful advice on how to best meet the duty to refer responsibilities, along with examples of what genuine cooperation looks like from within England and Wales.

This guidance was published to demonstrate convincing reasons for why the duty to refer should be practised as an 'opportunity to cooperate' to prevent and relieve homelessness.

⁴⁴ Knight, T., Purdon, S., Lloyd, R., Bryson, C. (2018) Evaluation of the Homelessness Prevention Trailblazers, Ministry of Housing Communities and Local Government. London

⁴⁵ Housing Act 1996 (amended by the Homelessness Reduction Act 2017), Part 7 section 179

⁴⁶ Housing Act 1996 (as amended) Part 7 section 179(2)

⁴⁷ Homelessness (Review Procedure Etc.) Regulations 2018, Part 4 Duty to Refer

The guidance includes detailed advice on how best to administer the duty to refer, good practice examples of co-operation between local housing authorities and others to tackle homelessness, plus numerous templates, such as checklists, process charts, example referral forms, training materials and other learning points.

View and download the report, plus other supporting documents at the following link www.local.gov.uk/duty-refer-opportunity-cooperate-tackle-homelessness

A review of crisis prevention activities should focus on the duties to prevent or relieve homelessness.⁴⁸ A homelessness review could seek to understand how the new burdens arising from the Homelessness Reduction Act has impacted on the how the local authority administered its duties. There could also be scrutiny of the outcomes for people who are homeless or threatened with homelessness. This could extend to how assessments and personalised plans are being completed, plus the effectiveness of these. A Homelessness Review could probe how people are helped to remain in their existing accommodation, or when this is not safe or possible, assisted to secure alternative accommodation. The effectiveness of joint working arrangements with housing benefit administrators, debt advice services, private rented sector enforcement officers, sanctuary schemes, housing possession court desks and pre-eviction protocols with private registered providers of social housing could all be reviewed.

A review of activities to prevent the reoccurrence of homelessness, should focus on the support, advice, assistance and counselling people receive to be able to sustain their accommodation. These could be activities carried out by local housing authority, either via its own homelessness services, or as a commissioner of support services. Logically, a review of activities to prevent the reoccurrence of homelessness should also extend to those undertaken by other public authorities, voluntary

⁴⁸ Housing Act 1996, Part 7, sections 195 - 196

organisations, private registered providers of social housing and others. Both community-wide and accommodation-based support should be investigated for its quality, effectiveness and impact.

Securing accommodation

A review of activities to secure accommodation for people who are homeless or threatened with homelessness, could cover general housing market supply and affordability factors, but also concentrate on:

- temporary accommodation provision
- social rented housing allocations to persons who are homeless or owed a homelessness duty of assistance
- private rented sector accessibility for persons who are homeless or owed a homelessness duty of assistance.

Housing our homeless households

The LGA published a report in July 2017, in response to rising concern amongst local authorities about the increasing homelessness pressures being faced across the country. Housing our Homeless Households explores the increasing demand for temporary accommodation, and the innovations that a number of councils are pursuing to respond to this increasing demand, with recommendations and tools for other councils to replicate activity in their areas. The project also explores reforms that the Government can make to better help councils to support homeless households.

The additional resources are also available online, to help councils replicate practice in their own areas. This includes practical information, such as guides, policies, templates and agreements used by councils featured in the report, to:

1. establish leasing schemes with private and housing association landlords
2. develop strategies for working with private landlords and letting agents

3. focus on prevention when working well with homeless households
4. use allocation policies and supported housing
5. acquire, convert and build new property for use as temporary accommodation (including modular construction)
6. collaborate with other councils across areas.

View and download the report, plus other supporting documents at the following link www.local.gov.uk/housing-our-homeless-households-full-report

A review of housing market supply and affordability factors can be informed from a separate local housing needs survey, social and/or private sector stock condition survey, or evidence collected for a local or regional housing strategy, or empty homes strategy. A review of the affordability of accommodation, should take account not only of market rates but also how people pay for their accommodation, especially in respect of those who need to claim welfare assistance with housing costs.

A review of temporary accommodation provision could cover arrangements for procuring, allocating and managing temporary accommodation, to ensure they are fit for purpose. An analysis of the types and suitability of temporary accommodation used (including use of bed and breakfast accommodation), length of stay, out-of-borough placement, characteristics of households placed in temporary accommodation (including those with children and/or a pregnant woman, 16/17-year olds) could also be carried out.

A review of how local housing allocation schemes help people who are homeless or threatened with homelessness, to secure social rented housing could be carried out. Examples of how this might be undertaken are provided elsewhere in this guide, under the section titled Housing Allocation Schemes.

A review of private rented sector access schemes for people who are homeless or threatened with homelessness, could be carried out. This can focus on the types and effectiveness of landlord incentives used. The use and impact of initiatives such as rent-in-advance, cash deposits, bonds, and other measures could also be probed.

Providing support

A review of the support provided to people who are homeless or have been homeless could look at the activities which aim to relieve homelessness, plus avoid a repeat occurrence of homelessness in the future. This can include:

- the types and prevalence of support needs
- the types of accommodation-based support services and the outcomes they are achieving
- the types of non-accommodation-based support services and the outcomes they are achieving
- support provided by public authorities under public law duties
- support provided by voluntary organisations, both commissioned and non-commissioned.

A review of support needs could seek to classify these by individual personal factors (eg relationship breakdown, mental ill health and substance misuse) and structural factors (eg poverty, availability of social housing). MHCLG with the Department for Work & Pensions (DWP) published independent research on the causes of homelessness and rough sleeping.⁴⁹ The finding from this research could be used to inform a local analysis of support needs.

A review of the types of accommodation-based support services (eg hostels, refuges) and the outcomes they are achieving could consider:

- the accessibility of this provision

⁴⁹ Alma Economics (2019). Homelessness: causes of homelessness and rough sleeping rapid evidence assessment. Ministry of Housing Communities & Local Government and Department for Work & Pensions. London

- the standard of accommodation
- the staffing arrangements and support philosophy
- the rules for exclusions and evictions
- move-on support
- and other matters.

A review of the types of non-accommodation-based support services (eg floating support, Housing First provision) and the outcomes they are achieving, could consider matters such as:

- whether the support being provided is sufficiently personalised
- the joint working arrangements between the support provider and the accommodation provider
- the efforts being made to help people feel part of their community and take-up employment
- whether the support is outcome focused and asset-based
- how people are being helped to increase their personal income and improve their wellbeing.

For both accommodation-based and non-accommodation-based support services, service users, staff and stakeholders could all be consulted. An analysis of performance results and outcomes could be carried out. An onsite review of policies, procedures and practices could also be undertaken.

A review of support provided by public authorities under public law duties, could look at how a local housing authority's homelessness service is working with:

- adult social care services to fulfil duties owed to vulnerable homeless adults under the Care Act 2014
- children's social care services to fulfil duties owed to homeless 16 and 17-year olds and other homeless households where dependent children reside under the Children Act 1989

- NHS Clinical Commissioning Groups, NHS Trusts and NHS Foundation Trusts to fulfil duties owed to adults who are mentally ill under the Mental Health Act 1983
- other local housing authority colleagues to fulfil public law housing duties to various persons in specified circumstances
- Department of Work & Pensions support to help find employment.

The impact of homelessness on health: a guide for local authorities

The LGA published a report in September 2017, providing information and ideas to support local authorities in protecting and improving their population's health and wellbeing, and reducing health inequalities, by tackling homelessness and its causes.

Homelessness often results from a combination of events such as relationship breakdown, debt, adverse experiences in childhood and through ill health. Homelessness and ill health are intrinsically linked and professionals in both sectors have a role to play in tackling the issues together.

View and download the report, plus other supporting documents at the following link www.local.gov.uk/impact-health-homelessness-guide-local-authorities

When reviewing how vulnerable homeless adults are supported, there could be scrutiny of joint working between local housing authorities and social service authorities in respect of:

- using powers and duties to provide accommodation
- carrying out assessments and care planning to meet support needs
- preventing homelessness and promoting wellbeing
- supporting persons from abroad who are not eligible for homelessness assistance.

More information is given in the Department of Health's Statutory Guidance on Care and Support.⁵⁰

When reviewing how 16 and 17-year olds and other homeless households where dependent children reside are supported, there could be scrutiny of joint working between local housing authorities and social service authorities in respect of:

- assessment of causes of homelessness, housing and support needs, and whether a child needs services to achieve or maintain their health and wellbeing, or avoid it being significantly impaired
- provision of services to meet a child's identified needs
- support for children from abroad
- individual children who have no parents or carers
- young people who need care beyond the age of 18 years
- generally performing obligations under the Children Act 1989.

More information is given in the Department of Health's Statutory Guidance on working together to safeguard children.⁵¹

When reviewing how adults who are mentally ill are supported, there could be scrutiny of joint working between local housing authorities and NHS authorities in respect of those who are leaving hospital after having been unwell and need after-care.⁵²

When reviewing how a local housing authority homelessness service is working with other local housing authority colleagues, there could be scrutiny of joint working in respect of:

- rehousing households whose home has been subject to a compulsory purchase order⁵³
- homeowners who purchased their home

50 Care and Support Statutory Guidance, Department of Health, June 2014

51 Working together to safeguard children, Department for Education, March 2015

52 Code of Practice: Mental Health Act 1983, Department of Health, 2015

53 Land Compensation Act 1973, section 39(1)

under right-to-buy arrangements, whose home is defective⁵⁴

- secure tenants of local housing authority social rented housing who are being evicted.⁵⁵

The MHCLG published an independent evaluation of the Skills, Training, Innovation and Employment (STRIVE) pilot, in August 2018.⁵⁶ This programme was targeted at single people experiencing homelessness in London, who were claiming unemployment welfare benefits. Together with the Department for Business, Innovation and Skills (now known as Department for Business, Energy and Industrial Strategy) £297,000 of funding was provided. STRIVE was commissioned to pilot an alternative to the Work Programme, which had been identified as being unsuitable for the target cohort. The findings from this research could be used to inform a local review of how support is provided to be people who are, or have, experienced homelessness to secure employment.

Resources

A review of the resources available to carry out activities to tackle homelessness should cover money, people, IT and any other materials.

A review of money should look at both a local housing authority's own spending on homelessness activities, plus also grants received from MHCLG and other government bodies.

In terms of a local housing authority's own spending, scrutiny of forecast and actual spend of a homelessness service budget could be carried out. There could also be consideration of spending by a local housing authority on commissioning voluntary organisations and others to prevent homelessness, supply accommodation and provide support. Spending by other public authorities on activities to tackle homelessness could also be examined,

54 Housing Act 1985, Part XVI Assistance for owners of defective housing

55 Housing Act 1985, schedule 2, grounds 9-16 inclusive

56 ICF Consulting. (2018). STRIVE Evaluation: Final report. Ministry of Housing, Communities & Local Government. London

as could funding available to voluntary organisations and private registered providers of social housing from philanthropic trusts, social enterprise trading, investment national bodies, non-governmental bodies and other public sector agencies.

In terms of grants received from MHCLG, inquiries could be made about whether the total amount allocated is used for its intended purpose, plus the success of bidding for additional funding could also be probed. The money available to a local authority could be benchmarked against that of other local housing authorities, to ascertain if income and expenditure is satisfactory.

The review could also consider securing investment from the commercial sector, via a social impact bond, and using a payment by results arrangements with commissioned providers. MHCLG published an independent evaluation of its Fair Chance Fund programme, in April 2019.⁵⁷ Together with the Cabinet Office and Department for Digital, Culture Media and Sport, funding was provided via Social Impact Bonds (SIB), using a payment by results (PBR) approach to improve accommodation, education and employment for people aged 18 to 24 years, who were experiencing homelessness. The findings from this research could be used to inform a local review of how resources are allocated for tackling homelessness.

A review of staffing should look at the employees of a local housing authority, plus those of other organisations.

In terms of the employees of a local housing authority, there could be consideration of the staffing structure, the procedures and processes in force, whether there is enough staff to cope with caseload levels. Additionally, the training that staff receive, both in terms of the specifics of homelessness legislation (eg knowledge of the Homelessness Reduction Act 2017, the Housing Act 1996, etc) and the general skills (eg providing advice, carrying out

assessments, etc) to undertake their role could also be assessed.

In terms of staffing from other organisations, there could be evaluation of the training and professional development opportunities provided to staff of voluntary organisation and private registered providers of social housing to prevent homelessness, source accommodation, and provide support. There could also be an examination of the training provided to non-local housing authority public sector professionals on homelessness (eg causes, housing options, rights when homeless, etc).

A review of IT should look at the software and hardware available to help administer homelessness functions and assist people who are at risk of homelessness. This could involve investigating the use and effectiveness of software for:

- self-service housing advice
- receiving referrals for cases of homelessness
- formulating personalised plans
- case management
- data reporting (eg H-CLIC)
- temporary accommodation property and void management
- controlling referrals and use of housing related support services
- other modules to help enhance the administration of homelessness functions, such as online forms, applications, reports, information packs, letter templates.

Suitability of software for administering a housing register, mutual exchange schemes, and social lettings agencies could also be reviewed. An appraisal of hardware available to deliver homelessness services could also be undertaken, looking at the use of terminals for self-service housing advice and tablets or other devices for when carrying out home visits.

⁵⁷ ICF Consulting. (2019). Fair Chance Fund: Final Evaluation. Ministry of Housing, Communities & Local Government. London

Kent Homechoice: providing digital support for housing and homelessness

The Kent Homechoice partnership has developed and implemented three online tools to transform the way in which people across Kent and Medway gain access to homelessness support and the housing registers.

The aim is to give residents better and more tailored advice about their housing options and to relieve the pressure on housing staff.

www.local.gov.uk/kent-homechoice-providing-digital-support-housing-and-homelessness

Formulating a homelessness strategy

The conclusions and recommendations from a homelessness review should be carried forward to form the objectives and actions for inclusion in a new homelessness strategy.

The Homelessness Act 2002 stipulates that a homelessness strategy must include objectives for:

- preventing homelessness in the area
- making sure that accommodation is, or will be, available for people in the area who are, or might be, homeless
- providing support for people in the area who are, or may become homeless, or have been homeless and need support to prevent them from becoming homeless again.

A local housing authority could include additional objectives if desired, such as monitoring the levels of homelessness, or ensuring sufficient resources are available to tackle homelessness. The objectives specified in the Act should provide a clear enough statement of intent to tackle any form or cause of homelessness.

A homelessness strategy should be a concise forward-looking document that includes a summary of the findings from the homelessness review.

The strategy should incorporate a comprehensive action plan that shows clearly:

- which organisations are going to be involved in completing each action
- specifics of each action to be taken
- a deadline for when each action is expected to be completed
- in cross-authority action plans, the local authority areas to which each action relates
- the resources that will be needed to complete each action
- the intended change that accomplishing each action will achieve
- the steps that will followed to complete each action.

A homelessness strategy should also include specific objectives to be pursued, and actions to be undertaken by local housing authorities and social services authorities (both adult and children services), in the course of administering their public law functions. For vulnerable adults, 16/17-year-olds and care leavers this could include:

- establishing shared provision of information and advice
- having collaborative arrangements for assessment of needs and assisting those owed a duty under homelessness and/or social care legislation
- procuring accommodation for those owed a duty under homelessness and/or social care legislation
- pooling budgets to commission advice, assistance and counselling.

A homelessness strategy should also include actions to be undertaken by private registered providers of social housing, public authorities, voluntary organisations and others, towards accomplishing the three legislated objectives (and any other locally agreed). This should extend to all forms and causes of homelessness and could cover:

- joint working arrangements between a local housing authority and other public

authorities to better administer public law responsibilities

- arrangements to provide information and advice to people who are homeless or threatened with becoming homeless
- shared working arrangements to advise and assist people more at risk of homelessness
- initiatives to help people threatened with homelessness to remain in their existing accommodation or to secure alternative accommodation
- initiatives to help people who are homeless to secure accommodation
- the supply of temporary and settled accommodation
- developing access to the private rented sector
- making best use of housing allocation schemes
- commissioning advice, counselling and support services to help people remain in their accommodation.

Local housing authorities should consult widely with social service authorities, private registered providers of social housing, public authorities, voluntary organisations and others about the actions that should be included in a homelessness strategy. Consultation could take place using a mixture of methods, including group events, individual interviews (in person or via the phone) and online surveys.

A homelessness strategy can include an explanation about the delivery and accountability of achieving the agreed objectives and actions. This could encompass arrangements for democratic oversight of a homelessness strategy, steering the enactment of the action plan, sharing good practice, and case conferencing of complex cases.

CASE STUDY

Sefton Metropolitan Borough Council

Sefton Metropolitan Borough Council is a unitary local housing authority founded in 1974, located in Merseyside.

Sefton Metropolitan Borough Council published a new homelessness strategy in 2018, prior to this a homelessness review had been completed identifying the causes of homelessness and gaps in provision. A draft of the homelessness strategy was published and made available for public consultation, which was carried out via an online survey, over a 13-week period. The public consultation sought to capture views about the objectives and actions featured in the proposed strategy.

Separately, Sefton Metropolitan Borough Council carried out a workshop with key stakeholders, to consult them about which agencies would be best placed to deliver the proposed actions, plus what would be realistic timescales for achieving the chosen actions.

The results from both consultations informed the contents of the final action plan.

View and download a copy of Sefton Metropolitan Borough Council's Homelessness and Rough Sleeping Action Plan at the following link www.sefton.gov.uk/media/1569759/Action-Plan-Homelessness-Strategy-Doc-v3.pdf

For further information, contact Neil Davies, Housing & Investment Services Manager, by emailing neil.davies@sefton.gov.uk

What makes homelessness strategies happen?

When fulfilling homelessness strategy duties, local housing authorities must:

- consider the statutory guidance on homelessness
- pay attention to the objectives of their housing allocations scheme
- their tenancy strategy
- any homelessness strategy published by the Greater London Assembly (applicable to London boroughs only)
- put in place arrangements to oversee the delivery of homelessness strategies
- ensure accountable structures are in place to have oversight of the delivery of homelessness strategies.

Statutory guidance

Local housing authorities must pay attention to statutory guidance on homelessness, published by MHCLG. Chapter 2 of the current code of guidance focuses on homelessness strategies and reviews. This guidance reinforces the assistance that social services authorities must offer. The guidance also promotes inclusion of the following themes into homelessness reviews and strategies:

- preventing homelessness
- advice and information
- early identification
- pre-crisis intervention
- preventing recurring homelessness
- partnership arrangements
- increasing the supply of new housing
- accessing the private rented sector
- access to social housing
- temporary accommodation
- supported housing and refuges
- empty homes

- disabled facilities grant
- support for single people
- support for rough sleepers
- support for families
- support for victims of domestic abuse.

The guidance emphasises that local housing authorities and social services authorities, must take account of the homelessness strategy for their area, when administering their functions. In practice this means the way homelessness and social care functions are administered, should be reflective of the priorities and actions included in a local homelessness strategy. For example, if an aim of a local homelessness strategy is to prevent homelessness, then the daily operation of homelessness services and social care services, should concentrate on preventing homelessness whenever possible. The aims of a homelessness strategy, should be a key feature of local housing and social care policies and programmes.

View and download a copy of the statutory guidance at the following link www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities

The aims and actions included in any homelessness strategy published by MHCLG should appropriately feature in a homelessness strategy published by a local housing authority.

Housing allocation schemes

A local housing authority should reference its housing allocation scheme when formulating a homelessness strategy. The priorities for allocating social rented housing should be suitably reflected in the objectives and actions included in a homelessness strategy. The law requires that people who are homeless or owed a duty of assistance due to being homeless or threatened with homelessness, must be given a reasonable preference for an allocation of social rented housing.⁵⁸

⁵⁸ Housing Act 1996, Part 6, section 166A Allocation in accordance with allocation scheme

A homelessness review should analyse data associated with applications from persons who are homeless or owed a duty of assistance, to join a local housing allocation scheme, plus also lettings made to these groups of people. This data should be analysed over a reasonable period, usually a minimum of five years in order to clearly understand the trends. The Government publishes data about the lettings and sales of social housing in England, via its CORE website.⁵⁹ This information is usually updated annually, sourced from private registered providers of social housing and stock retained local housing authorities, and is available on a local authority area basis. The statistics provide intelligence on trends in social lettings, characteristics of new tenants, the properties available, and more. Additionally, MHCLG also publishes tables showing numbers of households on local authorities' waiting lists and more.⁶⁰

In regard to housing allocation schemes, a homelessness review could appraise:

- the housing options available to persons who are homeless or owed a duty of assistance, who are not eligible for an allocation of social rented housing
- how grounds for disqualification from joining a housing allocation scheme might impact on persons who are homeless or owed a duty of assistance
- the advice, information, and assistance on making an application for social rented housing, provided to persons who are homeless or owed a duty of assistance
- the choice and opportunities to express a preference of what social rented housing is allocated to persons who are homeless or owed a duty of assistance
- the degree of reasonable preference afforded to persons who are homeless or owed a duty of assistance

- whether persons more at risk of homelessness (eg persons leaving prison, offenders, care leavers, persons leaving hospital, the armed forces, escaping domestic abuse, that are a vulnerable adult, or others) are regarded as having a reasonable preference for an allocation of social rented housing, or have been given additional preference.

A homelessness strategy could include specific actions to improve how allocations of social rented housing are made to persons who are homeless or owed a duty of assistance, for example to:

- prevent homelessness for people more at risk of homelessness by allocating them social rented housing
- prevent homelessness when people are unable to remain in their existing accommodation, by allocating them social rented housing
- help people move-on from temporary accommodation and/or supported housing
- help people who are homeless to obtain suitable accommodation, by allocating them social rented housing
- ensure duties owed to persons who are homeless can be suitably discharged with an allocation of social rented housing.

Whenever a local housing authority chooses to adopt a new housing allocation scheme, or alter an existing one, regard must be had to the objectives and actions included in a local homelessness strategy. Logically therefore, following the adoption of a new homelessness strategy, a local housing authority should consider whether their housing allocation scheme needs to be reframed, to ensure the way social rented housing is allocated to persons who are homeless or owed a duty of assistance, reflects the priorities of the new homelessness strategy.

⁵⁹ <https://core.communities.gov.uk>

⁶⁰ www.gov.uk/government/statistical-data-sets/live-tables-on-rents-lettings-and-tenancies

CASE STUDY

Rochford District Council

Rochford District Council is a non-stock holding local housing authority founded in 1974, located in Essex.

Rochford District Council altered its housing allocation scheme in 2018, taking account of the objectives and actions included in its homelessness strategy. Rochford District Council wished to re-frame the priorities of its housing allocation scheme to ensure, that persons who were homeless, or owed a duty of assistance due to being homeless or threatened with homelessness, were suitability prioritised for an allocation of social rented housing.

Rochford District Council adopted the new two-band structure, which disqualified any applicant that wasn't entitled to a reasonable preference for an allocation of social rented housing.

Persons who are homeless are placed in the first (highest) band, which includes other applicants all of whom are afforded additional preference in addition to being entitled to a reasonable preference. Persons who are owed a duty of assistance due to being homeless or threatened with homelessness are placed in the second (lowest) band, which includes other applicants all of which are entitled to a reasonable preference.

Applicants that are homeless or are owed a duty of assistance due to being homeless or threatened with homelessness, are limited to one reasonable offer of social housing to ensure they can swiftly exit homelessness, and help enable move-on from temporary accommodation, therefore reducing their length of stay in this interim arrangement, and limit the use of bed and breakfast accommodation and other less suitable forms of temporary accommodation.

The scheme has been framed to ensure persons who are homeless (eg people sleeping rough) are given extra

favour for a letting of social housing. Other persons who are owed a duty of assistance due to being homeless or threatened with homelessness, are also given some favour for a letting of social housing, but slightly less due to them being housed, either in their existing home, while Rochford District Council seeks to prevent their homelessness, or in temporary accommodation while Rochford District Council seeks to relieve their homelessness.

View and download a copy of Rochford District Council's Housing Allocation Scheme at the following link www.rochford.gov.uk/sites/default/files/housing_allocations_h2_4.pdf

For further information, contact Jeanette Hurrell, Housing Options Team Leader, Rochford District Council, by emailing jeanette.hurrell@rochford.gov.uk

Tenancy strategies

A local housing authority should reference its tenancy strategy when formulating a homelessness strategy. The priorities for how tenancies are granted must be suitably reflected in the objectives and actions included in a local homelessness strategy.

A homelessness review should analyse the trends associated with the types of tenancy agreements issued to persons who were homeless or owed a duty of assistance. The Government publishes data about the types of tenancy agreements, via its CORE website.⁶¹ This information is usually updated annually, sourced from private registered providers of social housing and stock retained local housing authorities, and is available on a local authority area basis.

In regard to a tenancy strategy, a homelessness review could appraise:

- the type of tenancies granted to persons who were homeless or owed a duty of assistance

⁶¹ <https://core.communities.gov.uk>

- the circumstances in which social landlords will grant persons, who were homeless or owed a duty of assistance, a tenancy of a particular kind
- where social landlords have granted persons, who were homeless or owed a duty of assistance, tenancies for a certain length of term
- circumstances where social landlords have granted persons, who were homeless or owed a duty of assistance, a further tenancy when an existing tenancy came to an end.

A homelessness strategy could include specific actions about types of tenancies for persons who are homeless or owed a duty of assistance, to ensure tenancies are of a particular kind and length of term, plus allowances made for further tenancies to be granted when an existing tenancy comes to an end, to aid the prevention of homelessness, securing accommodation for people who are homeless or threatened with homelessness and the provision of support to people who are homeless or threatened with homelessness, or were previously homeless.

London housing strategy

Homelessness strategies published by London borough councils, must incorporate the priorities of the Mayor of London for tackling homelessness. Likewise, findings from investigations about homelessness, carried out by the Housing Committee of the London Assembly, should be suitably referenced when carrying out a homelessness review.

The Mayor of London published a rough sleeping plan of action⁶² in 2018. This strategy includes a five-year investment plan. The principle objectives are:

- preventing rough sleeping
- an immediate route off the streets
- sustainable accommodation and solutions
- support people to rebuild their lives.

62 Mayor of London Rough Sleeping Plan of Action, Greater London Authority, 2018
www.london.gov.uk/sites/default/files/rough_sleeping_plan_of_action_1.pdf

Recent reports published by the Housing Committee of the London Assembly, have focused on Housing First,⁶³ temporary accommodation,⁶⁴ and hidden homelessness.⁶⁵ Key recommendations for the Government and the Mayor of London have included:

- legislation that guarantees victims of abuse can remain in their homes
- sufficient financial support to implement the Homelessness Reduction Act 2017
- recording of protected characteristics of those using housing options services, to learn more about London's homeless population
- improvement to the quality of advice and support for people in receipt of social security benefits, at risk of homelessness and in temporary accommodation
- more funding set aside for innovative temporary accommodation projects, such as Capital Letters⁶⁶ and PLACE⁶⁷
- policies to reduce homelessness and improve housing security must not be undermined by welfare reforms
- involving people who have experienced living in temporary accommodation, in the design and management processes
- longer term funding for Housing First Schemes
- establishing a pan-London Housing First lettings agency.

63 Housing First – a solution to chronic homelessness, London Assembly Housing Committee, 2019

64 Living in Limbo: London's temporary accommodation crisis, London Assembly Housing Committee, 2019

65 Hidden homelessness in London, London Assembly Housing Committee, 2017

66 www.londoncouncils.gov.uk/our-key-themes/housing-and-planning/capital-letters

67 www.londoncouncils.gov.uk/our-key-themes/housing-and-planning/place---new-approach-tackling-homelessness

Good practice – combined authorities

When formulating a homelessness strategy, local housing authorities which are members of a combined authority, are encouraged to have regard to any homelessness policy or plans published by the elected Mayor for their combined authority area. Although the Government has devolved some housing policy matters⁶⁸ to combined authorities', homelessness policy has not specifically been devolved to-date. Notwithstanding this, as a result of making grant payments to combined authorities, MHCLG has encouraged these bodies to take a strategic role in tackling homelessness. Funding awarded to selected combined authorities to-date has included grants to pilot the Housing First approach⁶⁹ and support for armed forces veterans who are homeless or at risk of it,⁷⁰ plus a social impact bond to end rough sleeping.⁷¹

Delivery arrangements

The delivery of a homelessness strategy requires close working between local housing authorities and social services authorities (including where adult and child social care services are provided by a county council). Alongside these bodies, private registered providers of social housing are expected to play an active role in delivering a homelessness strategy, due to legal and regulatory requirements that oblige these organisations to co-operate.

MHCLG is interested in introducing Homelessness Reduction Boards, to improve the delivery of homelessness strategies. The specifics of how such boards would be established, whether they would have any statutory duties or powers hasn't yet been confirmed. Notwithstanding this, there are

68 Cities and Local Government Devolution Act 2016

69 www.gov.uk/government/news/housing-secretary-james-brokenshire-awards-funding-to-reduce-rough-sleeping

70 www.gov.uk/government/news/brokenshire-announces-funding-boost-for-homeless-veterans

71 www.greatermanchester-ca.gov.uk/news/funding-boost-for-greater-manchester-scheme-assisting-entrenched-rough-sleepers/

plenty of options available to local housing authorities to ensure robust governance of homelessness strategies.

A group should be established to oversee the delivery of a homelessness strategy. The group should meet regularly, every three months is ideal, to cover an agenda that includes:

- information about the current levels of homelessness
- discussion about the progress of homelessness strategy actions to prevent homelessness, secure accommodation and provide support
- decisions about the allocation of resources to deliver a homelessness strategy.

A steering group should be responsible for updating a homelessness strategy action plan, to ensure it remains relevant. A steering group should be chaired by a chief officer whose responsibilities include homelessness. Other members of the group should include chief or principle officers from bodies that have a statutory obligation to assist with delivering the homelessness strategy and undertaking homelessness duties, these being:

- adult social care
- child social care
- private registered providers of social housing (especially those formed to receive a voluntary transfer of social rented housing from a local housing authority).

It is advisable that senior officers for the following public policy matters should also be members of a strategy steering group, as these bodies have duties to make referrals of cases homelessness, and/or are responsible for setting local policy for people who are more at risk of homelessness:

- prisons (whenever located in a local authority area)
- youth offender institutions, secure training centres and secure colleges (whenever located in a local authority area)
- National Probation Service and Community Rehabilitation Companies

- Jobcentre Plus
- NHS Trusts and NHS Foundations Trusts
- Ministry of Defence armed forces advice and resettlement service (whenever located in a local authority area)
- Community Safety Partnerships (in regard to victims of domestic abuse and other persons who are more likely to become homeless, such as those misusing alcohol and/or drugs, young people at risk of financial/sexual exploitation)
- public health (in regard to other persons who are more likely to become homeless, such as households with dependent children, those misusing alcohol and/or drugs, persons with HIV and/or TB, etc).

Membership of a steering group could also include periodic attendance, whenever a specific reason warranted it, from other agencies who can contribute to tackling homelessness, such as:

- other public authorities
- voluntary organisations (or a representative body on behalf of the sector)
- any other interested persons (including those with experience of homelessness).

Short life (eg less than 12 months) task and finish groups can be created as and when needed, to accomplish specific action from a homelessness strategy. Membership of these groups could vary, depending on the specifics of any given actions. Nevertheless, it would be sensible for a member of the strategy steering group to chair any task and finish group, to ensure accountability and deliverability.

A homelessness forum could take place, once or twice a year, to promote progress towards achieving homelessness strategy objectives. Attendance at the forum can be open to everyone with an interest in tackling homelessness. The forum could be chaired by an executive/cabinet member, or a chief officer, whose responsibilities include homelessness.

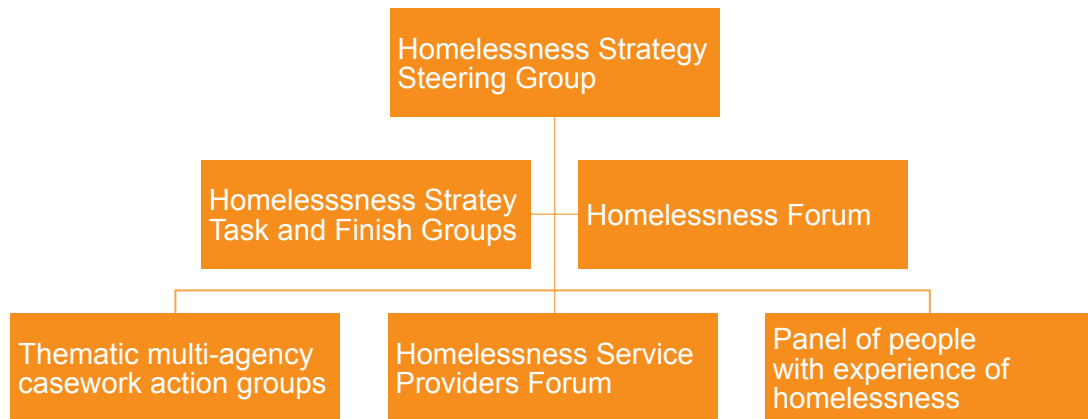
Local or national expert figures can be invited to speak at the forum, in addition to a core agenda covering the following matters:

- a report from the chair of the homelessness strategy steering group, on progress being made to accomplishing homelessness strategy objectives
- reports from homelessness strategy task and finish groups, on the work they have completed
- recruitment of volunteers to join task and finish groups to carry out homelessness strategy actions before the next meeting
- reports from thematic and multi-agency casework action groups, that might meet to better co-operate to prevent or relieve homelessness
- a report from any service provider forum that might meet to improve practice and service standards
- a report from any forum of people with experience of homelessness that might meet, to share their expertise and advocate for improvements to policy and practice.

Any number of casework action groups might be set-up, to better coordinate activities across agencies that either commission or provide services for people experiencing any form of homelessness (eg street homelessness or hidden homelessness), or due to specific characteristics (eg young adults aged under 24 years, persons of a black or other minority ethnic origin), or due to specific causes of homelessness (eg persons leaving care, hospital or prison). Chairs of such forums could attend the homelessness strategy steering group, to represent views of the forum members.

A forum for organisations that provide services to tackle homelessness, could be formed, to benchmark service standards relating to advice, accommodation, support, and other matters. The chair of such a forum could attend the homelessness strategy steering group, to represent views of the forum members.

Graphic 1: Example Homelessness Strategy Delivery Structure



A panel of service users could be established, to review the progress of delivering the homelessness strategy actions, and be consulted about the priorities looking ahead. Their know-how can be used to ensure that the activities carried out will have a relevant impact on the lives of those who it is intended to benefit. The chair of such a panel could attend the homelessness strategy steering group, to represent views of the panel members.

An extension of local arrangements can be joint forums or groups held by two or more local housing authorities. Any of the above groups, forums and panels should be extended to cover more than one local housing authority, when there is evidence that doing so would improve the deliverability of making a homelessness strategy happen. These arrangements could take place between:

- district and/or unitary councils across shire county areas (eg Kent has one county council, 12 district councils, and a unitary council)
- unitary councils and combined authority areas (eg Greater Manchester has a combined authority, plus 10 unitary councils)
- other sub-regions (eg East London Housing Partnership, which covers eight London boroughs).

CASE STUDY

Walsall Metropolitan Borough Council

Walsall Metropolitan Borough Council is a unitary local authority founded in 1974, located in the West Midlands.

Walsall Metropolitan Borough Council sought to build stronger relationships between departments (eg with housing benefit administrators) and agencies (eg West Midlands Combined Authority), to foster a multi-agency commitment to deliver their local homelessness strategy. Walsall Metropolitan Borough Council was especially keen to ensure involvement from local voluntary organisations (eg Black Country Women’s Aid), along with co-operation with a wide range of other local public authorities (eg West Midlands Community Rehabilitation Company).

Principle officers charged with administering homelessness functions held individual meeting with key personnel from adult and child social care, local private registered providers of social housing, and others, to understand their key priorities for tackling homelessness. Subsequently, a stakeholder event was held with all agencies to secure commitment to deliver actions included in the homelessness strategy.

Walsall Metropolitan Borough Council frequently confers with people who have

experienced homelessness, to get their views about what works, any barriers to service and any suggestions for improvements.

To ensure there is adequate staffing levels to administer the delivery of the homelessness strategy, Walsall Metropolitan Borough Council established an additional post to co-ordinate carrying out the actions to work towards achieving the objectives set for tackling homelessness.

A schedule of planned business meetings, plus networking events, ensures that delivery of the homelessness strategy is kept on track.

For further information, contact Neil Hollyhead, Senior Housing Strategy Officer, Walsall Metropolitan Borough Council, by emailing neil.hollyhead@walsall.gov.uk

Accountability structures

Elected councillors lead local housing authorities. As the primary accountable persons of a housing authority, they should set the vision and direction of the homelessness strategy, for the local community which they represent.

Elected councillors will want to see the findings from a homelessness review, and understand how this affects the wards they are elected to represent. Councillors should be active in decision-making about homelessness matters, taking responsibility to develop and review their councils' homelessness strategy.

The councillors that are members of a council executive or cabinet, should take decisions about their local housing authority's homelessness strategy. Evidence from a homelessness review, and annual action plan updates can provide valuable information for executive and cabinet members to consider. Sufficient time should be set aside for an executive or cabinet discussion about how council policies can help deliver the local homelessness strategy. The executive or cabinet member whose portfolio of

responsibilities includes homelessness, would benefit from regular (eg quarterly) updates, from a relevant chief officer, about the delivery of the homelessness strategy, and information on the levels of homelessness and activities being carried out to tackle homelessness. This will help ensure cabinet members take accountability for the delivery of a homelessness strategy.

A committee of elected councillors, who are not members of the executive or cabinet, will wish to scrutinise:

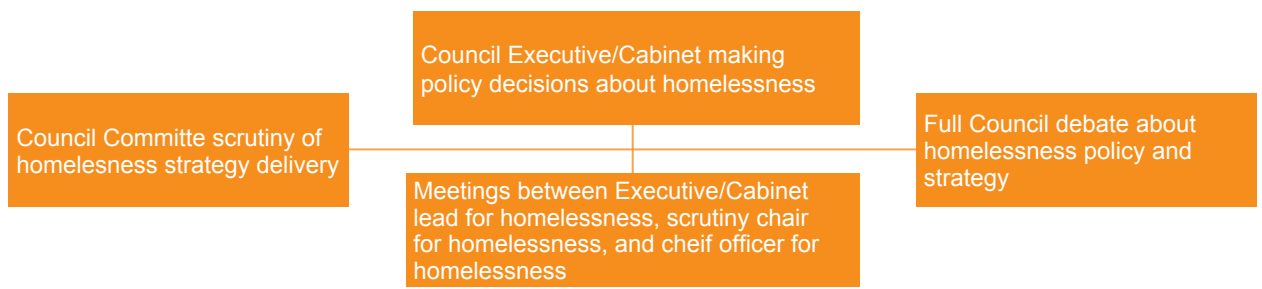
- the findings from a homelessness strategy
- the priorities and actions of any homelessness strategy formulated
- the delivery of a homelessness strategy once it has been published
- any subsequent modifications made to the strategy (eg annual updates of an action plan).

The committee charged with scrutinising homelessness policy and strategy, should do so at least annually. A member of such a committee, on behalf of the other members of the committee, would benefit from receiving updates from a relevant chief officer more frequently, akin to what is advised above for executive or cabinet members with responsibility for homelessness. This will allow the committee member to champion the issues of homelessness when scrutinising other policy decisions taken by the executive or cabinet.

Elected councillors of social services authorities, where adult and child social care functions are administered by a separate local authority, should also have suitable decision making and scrutiny arrangements in place concerning assisting local housing authorities with homelessness strategy duties.

To help ensure all elected councillors understand the statutory homelessness duties local housing authorities are charged with, training and briefing notes should be provided, following when a councillor is first elected, and periodically thereafter.

Graphic 2: Homelessness Strategy Accountability Structure



CASE STUDY

Warrington Homelessness Commission

Warrington Borough Council is a unitary local housing authority founded in 1974, located in Cheshire.

Warrington Borough Council established a Homelessness Commission in 2013, to lead a debate on homelessness in the local housing authority area. Elected councillors had concerns about the impact of welfare reforms and other significant national policy changes that could increase the risk of people becoming homeless. An increase in people sleeping rough in the town centre had also occurred.

A desktop review was carried out prior to the first meeting of the Commission, to help frame the debate. A series of roundtable meetings were held to hear and discuss key findings. The Commission engaged with a range of key stakeholders, including people who had experienced homelessness, plus service providers and commissioners. A call for evidence was made to ensure all facts were fully considered. A detailed analysis was carried out on the key issues identified from workshops, other engagement activity and roundtable discussion. Expert witnesses, nationally recognised leaders in the field of homelessness, were called to give evidence. The Commission produced a formal report, which included 13 recommendations. This led to the publication of a new homelessness strategy for Warrington.

For further information, contact Ann Wood, Homelessness & Housing Advice Manager, Warrington Borough Council, by emailing awoods@warrington.gov.uk

When do homelessness strategies need to happen?

Local housing authorities have to publish a homelessness strategy at least every five years, however modifications can be made at any time. MHCLG wants homelessness strategies to be published online and for action plans to be updated annually.⁷²

Prior to adopting or modifying a homelessness strategy, local housing authorities must carry out consultation with public authorities, voluntary organisations and other persons, on the objectives and actions of the homelessness strategy it intends to publish.

Publishing a homelessness strategy

Following the Homelessness Act 2002, local housing authorities had to complete their first homelessness review, and publish the first homelessness strategy for their area, before 31 August 2003.

Subsequently, most local housing authorities have to make sure a new strategy is published within five years of their last homelessness strategy being published. An exception to this rule was any local authority that had been declared to be of an ‘excellent’ standard. However, legislation connected to this revision has now been revoked, therefore, since 2017, all local housing authorities are now obliged to complete a homelessness review and re-publish a homelessness strategy at least every five years.

There are a number of reasons why a local housing authority might choose to publish a homelessness strategy sooner than the five-year maximum timeframe, these include:

⁷² Rough Sleeping Strategy, Ministry of Housing Communities and Local Government, 2018

- changes to homelessness legislation
- revisions to statutory guidance on homelessness
- introduction of a new national homelessness strategy or city-regional homelessness strategies
- reorganisation of local government structures, which results in the merger of two or more local housing authorities.

Updating and issuing a homelessness strategy can be time consuming. Carrying out a homelessness review can be a lengthy process, taking place over several months if done properly. The numerous stages associated with formulating and publishing a new homelessness strategy, means that this often can also stretch over a several months. Sufficient time is needed to accomplish the objectives and actions from a homelessness strategy. Therefore, publishing a new homelessness strategy more frequently than the maximum prescribed five-year time frame could be challenging.

Prior to publication of a homelessness strategy, local housing authorities might wish to carry out consultation with members of the public. Furthermore, elected councillors should have been provided an opportunity to scrutinise the review findings, and the strategy objectives and actions.

MHCLG is seeking to ensure all local authorities publish homelessness strategies online. Since the enactment of the Homelessness Act 2002, technologies such as websites, call centres, e-mail and smart phones, have improved the ways by which local housing authorities can communicate. Increasingly many local authorities publish their homelessness review and strategy on their website. IT plays a vital role in local government, as it supports the implementation of strategies, enhances service provision, and contributes towards democratic accountability.⁷³

⁷³ Heek, R. (2006) *Implementing and managing eGovernment*. Sage London.

Good practice – publishing a homelessness strategy

Both a homelessness review and a homelessness strategy have to be published. The contents of the published review, should provide a comprehensive account of homelessness in the local housing authority area. The contents of the published homelessness strategy should include an extensive set of actions that will be taken, to achieve local objectives for tackling homelessness. Published documents should clearly show any modifications made following the date of first of publication.

Members of the public have a right to request copies of a homelessness review and a homelessness strategy, by any reasonable means (eg in person, by phone, in writing). Copies of the review can be provided in printed or electronic format (eg in Word or PDF).

Local authorities should always consider requests for a copy of a homelessness review and/or homelessness strategy to be provided in Braille and in other alternative formats or languages.

CASE STUDY

St Helens Metropolitan Borough Council

St Helens Metropolitan Borough Council is a unitary local housing authority founded in 1974, located in Merseyside.

The council has published its most recent homelessness review and homelessness strategy online and made printed copies of the action plan available to key stakeholders. An electronic copy of the homelessness strategy can be found by a simple search using any internet browsers. The online document can be printed by any person if they should desire. A hard copy of the homelessness strategy can be requested for viewing, or for a copy to be taken away, via the local authority's

standard customer communication channels (eg in person at the contact centre, via the telephone, or by email).

Public authorities, voluntary organisations and others were provided with a hard copy of the homelessness strategy action plan, at a launch event for the new homelessness strategy with a copy of both the homelessness review and homelessness strategy being emailed to all key stakeholders in advance of the event.

The homelessness strategy, which covers the period 2018 – 2023, includes information about the national, regional and local homelessness context. Details about how the homelessness strategy will be delivered are also included, plus a five-year action plan, showing how St Helens Metropolitan Borough Council's objectives for how tackling homelessness will be achieved.

Copies of the strategy can be requested in alternative formats, such as Braille, audio tape or in a foreign language.

View a copy of St Helens Metropolitan Borough Council's Homelessness Strategy at the following link
www.sthelens.gov.uk/media/10223/homelessness-strategy-2018.pdf

For further information, contact Stephen Tracy, Senior Assistant Director for Housing, Community Safety, Recreation and Libraries, by emailing stephen.tracy@sthelens.gov.uk

emergence of new research evidence about the causes and/or solutions to homelessness, or the commencement of new legislation that might have an impact on the levels or causes of homelessness, or the activities carried out to tackle homelessness.

MHCLG is seeking to ensure local housing authorities annually re-publish any action plan that forms part of a homelessness strategy. By doing so, this will help local authorities to demonstrate what actions have been completed, and which are yet to be carried out. This approach increases accountability, as local authorities will need to explain why any actions might be behind schedule, or have been completed early, or indeed, are no longer relevant.

Modifying a homelessness strategy

Local authorities are charged with modifying their homelessness strategies whenever they decide this might be necessary. Alterations might involve changes to specific actions that are planned to be taken, and/or changes to any public authorities, voluntary organisations, or other persons that might contribute to objectives for tackling homelessness. Any modifications should be made on the basis that there is evidence to support such a modification. Modifications might occur as a result of new national or local political priorities for tackling homelessness, the

Findings

Conclusions

The law expects local housing authorities to lead the development and delivery of a homelessness strategy, with pro-active co-operation from other public authorities, voluntary organisations, private registered providers of social housing and others. The requirement to carry out a homelessness review at every five years provides an ideal opportunity to objectively consider what's working well, what needs to be better and what should be a priority when tackling homelessness. Both elected councillors and local government officers have a key role to play in making homelessness strategies happen.

Recommendations for local housing authorities

Recommendation One: Training for both elected councillors and officers should be arranged, to ensure there is a full awareness of the duties and powers arising from the Homelessness Act 2002 (see appendix one for a copy of the full legislation relating to homelessness reviews and strategies). This will help improve local housing authority's ability to fulfil the responsibilities in respect of homelessness reviews and strategies.

Recommendation Two: The homelessness strategy self-assessment (see appendix two) should be completed prior to submitting a homelessness strategy to MHCLG. The findings from carrying out a self-evaluation will give councils a sense of whether their local homelessness strategy complies with the requirements set down in law, MHCLG's

expectations, and nationally recognised good practice standards.

Recommendation Three: A homelessness strategy officer should be appointed to oversee the administration of the homelessness strategy action plan and all associated governance arrangements. This will help to ensure locally agreed objectives for tackling homelessness are accomplished (an example job description can be found at appendix three).

Recommendation Four: Homelessness strategy action plans must be detailed, have quantifiable outputs and show how actions will be attained. Action plans should include practical information about who will be involved in taking each action forward along with a deadline for completing each activity (an example action plan can be found at appendix four).

Recommendation Five: A homelessness strategy steering group (or Homelessness Reduction Board) should be established in every local housing authority area, to ensure the successful delivery of homelessness strategy action plans (an example terms of reference can be found at appendix five).



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