

Preventing rough sleeping

Recommendations from the Prevention Task and Finish Group

27.04.2018

INTRODUCTION

In life, every one of us needs good health, a stable home, a job, and a support network of friends and family; they are fundamental to being fulfilled, happy and productive.

The rise of rough sleeping is a very visual demonstration of the challenges that society and the economy has faced in helping everyone achieve those fundamentals.

But rough sleeping is at the acute end of a broad spectrum of homelessness, which, at the other end, includes households in accommodation experiencing challenges that are causing housing stress for the first time.

And people's lives are complex, many households face many barriers. Success by one agency might be undone by an absence of support from another, and so missing an opportunity to prevent someone's journey towards the streets.

Prevention of rough sleeping is therefore everything, it is everyone's business, and it requires collective and coherent action.

What we mean by prevention

There is a great deal of evidence of what constitutes good quality prevention, and very many brilliant people and initiatives succeeding in prevention every day.

For the purposes of this paper and the recommendations it makes, we have adopted an approach akin to the positive pathways framework commonly used to identify protective factors which prevent homelessness and reduce crisis.

This prevention framework is anchored within the spirit and objectives of the Homelessness Reduction Act and makes provision for:

- **Universal prevention** - preventing or minimising risk of homelessness and rough sleeping across the wider population at an early stage.
- **Targeted prevention** - focus on 'at risk' groups and transitions such as young people, BME, prisoner leavers, or mental health patients.
- **Crisis prevention** – preventing homelessness or rough sleeping likely to occur within 56 days in line with the Homelessness Reduction Act.
- **Emergency prevention** – support for those at immediate risk of sleeping rough, by provision of 'Somewhere Safe to Stay'.
- **Recovery prevention** – prevention of repeat homelessness and rough sleeping eg through support with tenancy sustainment and employment support (aligning with the intervention Task Group)

The recommendations made in this paper are built around the principle of creating a comprehensive prevention offer which minimises crisis and promotes self-help.

An overview of our recommendations

In essence our focus is on mobilising the full range of partners through their core responsibilities to deliver successful prevention through and beyond the Homelessness Reduction Act, our recommendations are threefold:

- **First, we recommend a refreshing of Local Homelessness Strategies alongside an acknowledgement by all that they become the main vehicle through which prevention of homelessness and rough sleeping is collectively owned, organised and delivered.**
- **Second, that every Government Department make a number of national commitments to preventing homelessness and delivering the Homelessness Reduction Act, including developing an implementation plan, monitoring and reporting their contribution, and ensuring their local delivery agents contribute to prevention activity and targets through Local Homelessness Strategies.**
- **Third, we make a number of operational recommendations for action to reduce the likelihood of rough sleeping for key at risk groups and transitions, where support is currently absent in many places. In particular we recommend moving quickly to pilot a ‘Somewhere Safe to Stay’ offer for those at immediate risk of rough sleeping (page 9).**

Crucially, it is our view that progress will be needed across all three areas in order to make serious inroads into preventing and reducing rough sleeping.

DELIVERY VIA LOCAL HOMELESSNESS STRATEGIES

Recommendation 1. Make refreshed Local Homelessness Strategies the vehicle through which all partner ambitions and funding to prevent homelessness and rough sleeping are locally understood, organised and delivered.

Since The Homelessness Act 2002 the majority of local housing authorities have been required to produce and maintain a homelessness strategy and in 2017 this duty was extended to all local housing authorities.

MHCLG guidance around homelessness review and strategy is non-prescriptive. There is no requirement to refresh the strategy more often than five years, even in the face of significant legislative change like the Homelessness Reduction Act.

Similarly, over time, local homelessness strategies have received gradually less attention and backing from Departments. Instead there has been a proliferation of national initiatives that have fragmented accountabilities and reduced certainty. While additional investment in new schemes is always welcome and well-meaning, over time they add complexity that can impact on the level of success for vulnerable group, who benefit most from a coherent, personalised and stable offer of support over long periods.

Positive steps have been taken since 2017. In particular replacing the Temporary Accommodation Management Fee with a Flexible Homelessness Support Grant, which gives councils some flexibility in seeking to achieve prevention. We now want to build on this, and believe the introduction of the Homelessness Reduction Act provides the framework through which to refresh Local Homelessness Strategies as the vehicle to achieve change.

Local Housing Authorities should be supported to:

1.1 Review Local Homelessness Strategies as the framework for achieving prevention through organising the range of interventions across a local area in a joined up and coherent manner, to include preventing rough sleeping. This includes:

- Use a nationally recognised positive pathways prevention framework to support a local exercise mapping the existing offers, identifying needs and reviewing and reshaping provision.
- Meet principles for stakeholder engagement including: consultation, co-production and delivery of the strategy with local statutory, voluntary and commercial partners, faith groups, and those with lived experience; and consultation with neighbouring authorities to minimise inconsistencies.
- Give due consideration to developing a joint Local Homelessness Strategy between a number of local authorities where this makes sense.
- Connect with other locally relevant strategies and plans, including on supported housing, housing, and planning.

1.2 Establish a framework for annually understanding and reviewing trends, and refreshing the strategy to respond to changes. This includes:

- Annually publish local homelessness figures, including rough sleeper count, the numbers in Temporary Accommodation, and presentation which could not be prevented or relieved.
- Set out how the strategy, partners and the interventions will respond to emerging trends in the subsequent 12 months.

1.3 Introduce an annual action plan to tackle and prevent rough sleeping and reduce emerging homelessness. This might include:

- commitments from local public service partners – including those with and without a duty to refer under the HRA, and other partners such as housing associations – to work positively with local housing authorities to prevent homelessness and rough sleeping
- cross service actions for prevention of rough sleeping with key departments within councils, such as social care, youth and education services as well as housing benefits.
- strengthen engagement with the Private Rented Sector (PRS) to encourage the availability of PRS to rough sleepers, or those at risk of rough sleeping i.e. incentives, refurbishment fund, rent guarantees.
- intervention for supporting individuals that present at immediate risk of sleeping rough, such as accessing a ‘Somewhere Safe to Stay’ pilot.
- discretionary support for those at risk of rough sleeping, for instance council tax exemptions for care leavers or use of social housing allocations, but to be determined by local authorities depending on local circumstances and pressures.

1.4 Finance the review with additional funding provided by the MHCLG. This would include:

- Basic level of funding through which to understand the review in light of the Homelessness Reduction Act and Rough Sleeping Action Plan
- The opportunity to make the case for additional funding - perhaps using PRS access funding allocated in the Budget or Housing First funding - to deliver these objectives where there is a proven need in the Local Homelessness Strategy for which there is not an existing offer or sufficient funding to provide an offer.
- A measure that links additional funding to progress made against outcomes annually published data including on rough sleeping numbers.

Objective	Evidence	Cost	Timescale
To review Local Homelessness Strategies to prevent homelessness and rough sleeping	Introduction of nationally backed Local Homelessness Strategies in 2002 was one action important to helping achieve 35% reduction in homeless acceptances in the nine quarters up to Q4 2005, sharpest reduction in 20 yrs	Minimal additional cost for reviews, anticipated as several million for all authorities in the first year, and then minimum in subsequent years.	In advance of April 2019

A NATIONAL COMMITMENT FROM EVERY GOVERNMENT DEPARTMENT

Recommendation 2: All Government Departments make a strategic commitment to delivering the Homelessness Reduction Act objectives by working with and supporting local areas to prevent homelessness and rough sleeping for all.

It is crucial that all Departments play a positive and collaborative role in the prevention of homelessness and rough sleeping, and that it is not just perceived as the responsibility of MHCLG and local housing authorities.

Collaboration to achieve prevention requires joint ambition, but it also needs common approaches to information, protocols, partnership, case management, training, monitoring, reviews and commissioning; maximising the value from collective investments.

We therefore make a number of recommendations for requiring all Departments to consider their role in preventing homelessness and rough sleeping, to set out what action they will take, and to monitor the success of this action.

All Government Departments should:

2.1 Commit to ending homelessness and rough sleeping by developing a joint statement which details the set of Departmental actions to take, this could include a commitment that no-one becomes homeless directly from leaving their services.

2.2 Review, as part of the wider 2 year review of the Homelessness Reduction Act led by MHCLG, the need to strengthen the legislative 'duty to refer' on public authorities into a 'duty to cooperate' in the prevention of homelessness and rough sleeping, and extending it to a wider group of public authorities.

2.3 Explicitly acknowledge the Departmental responsibilities in delivering the Homelessness Reduction Act, by developing and publishing a Departmental Implementation Plan that establishes a 'commitment to cooperate' in the prevention of homelessness, beyond the 'duty to refer'.

2.4 Determine definition of preventing homelessness and rough sleeping for each Department. Identify and define key success factors, put in place data collection and usage through which to monitor the impact of actions, report annually on progress towards ending homelessness and rough sleeping and produce action plans to continue this progress.

2.5 Lead culture change within the Department and its agencies, by providing clear and detailed guidance and training for all service managers, commissioners and staff in delivering the implementation plan through effective multi-agency working locally.

2.6 Adopt default commitment to route all additional funding targeted at supporting homelessness and rough sleeping prevention through Local Homelessness Strategies, either directly or as part of co-commissioning models. A case would have to be made for when adopting a different approach.

2.7 Engage with mechanisms that enable those with lived experience to contribute to co-design services.

Objective	Evidence	Cost	Timescale
To anchor strategic commitments and accountability	There is no means for reflecting homelessness in Departmental action	Minimal additional costs, staff training likely to be the greatest cost	Before April 2019

PREVENTING ROUGH SLEEPING FOR HIGH RISK GROUPS

Recommendation 3: Take forward specific operational Department-led actions to reduce the likelihood of homelessness and rough sleeping for at risk groups and transitions.

Underneath the strategic commitments needed from Departments in the prevention of homelessness, we have identified a number of key cohorts and key transition points where people are at particular risk of ending up rough sleeping due to gaps in support.

Public service works best when designed around the individual, rather than the bureaucracy. For the purposes of this paper we have set out a series of recommendations for each Department with the aim of better incentivising collaboration around individuals.

At risk groups and transitions

There is a good amount of evidence around the groups of people for whom there is an absence of support and a heightened risk of homelessness and rough sleeping, and the points in their life where support is especially necessary in preventing homelessness.

At risk groups for whom there is an absence of support can include people:

- with experiences of childhood trauma
- with mental health issues
- with experience of the criminal justice system
- with underlying health challenges
- under 35, in particular care leavers
- from black and ethnic minority communities
- that are recent migrants
- who have experienced human trafficking and / or modern slavery
- with experience of sleeping rough

At risk points at which there is insufficient support that increases immediate risk of rough sleeping include people:

- moving out of the criminal justice system, particularly short term sentences
- discharged from hospital following treatment
- leaving a mental health institution
- with a recent decision on an asylum claim
- transitioning out of support provided by the National Referral Mechanism (NRM)
- refused or decided not to enter the NRM
- in crisis with nowhere safe to stay that night.

The improvement of support for these groups requires action from a range of partners well beyond local housing authorities, and success will bring wide-ranging benefit for both individuals and services for whom homelessness can entrench barriers.

In addition to the Recommendations 1 and 2, the Ministry of Housing, Communities and Local Government should:

3.1 Support, enable, resource and ensure that local housing authorities, through the implementation of the Homelessness Reduction Act, are enabled to deliver the strategic prevention of homelessness including rough sleeping through refreshed Local Homelessness Strategies. This includes:

- Establish a nationally recognised framework for organising services to prevent homelessness, such as the positive pathway framework, which includes advice for adopting and commissioning different forms of provision, and can be used by councils to develop and refresh Local Homelessness Strategies.
- Link all national homelessness and rough sleeping activity to mainstream duties in the Homelessness Reduction Act and ensure the Act works for single people and rough sleepers, for instance routing the Housing First and PRS Access funding through Local Homeless Strategies.
- Introduce a strengthened role for the Homelessness Advice and Support Team which would offer scrutiny, support and challenge to the development and implementation of Local Homelessness Strategies where there are concerns over quality and impact.
- Properly monitor and review the financing of the Homelessness Reduction Act and commit to making shortfalls in funding were they are identified to ensure the Act is not undermined by lack of resource.

Objective	Evidence	Cost	Timescale
Robust support and endorsement for local leadership in understanding and delivering prevention	There is no requirement for prevention strategy or explicit mention of prevention of rough sleeping in the HRA	Minimal additional cost	Complete before April 2019

3.2 Increase the supply of housing options critical to helping prevent homelessness and rough sleeping, as part of an ambition to also help deliver housing led options including Housing First. This includes:

- Increase new supply through targeted allocation of grant via Homes England (& GLA); relaxing a range of Housing Revenue Account restrictions – including borrowing and use of Right to Buy receipts - for specific suitable housing, and; review capacity to add supply via developer contributions.
- Ensure the current review of short term Supported Housing delivers a secure funding model that secures existing provision and promotes future supply to meet local needs. For instance phase in delivery through transitional arrangements that involve piloting local authority commissioning in a number of areas, or other means for ensuring local authority oversight of the total offer.
- Ensure Private Registered Providers commit to cooperate with local services in the prevention of homelessness and rough sleeping. For instance by revising regulations published by the Regulator of Social Housing, and seek a commitment from the sector that no one is made homeless from social housing.
- Undertake a strategic review of the tenancy framework within the private rented sector and its potential role in housing, including in homelessness prevention through tenancy

sustainment. This might include additional tenancy security at a national level, and national backing of financial or policy incentives routed through Local Homeless Strategies such as national bond deposit scheme and Help to Rent projects.

- Develop an affordable housing offer for young people which underpins their engagement in education and employment.

Objective	Evidence	Cost	Timescale
Secure and increase supply of housing critical to crisis prevention of rough sleeping and upstream prevention of homelessness	Increasing homelessness, undersupply in the provision of supported housing of around 17,000 places, and reliance on expensive Temporary Accommodation, tripling of net costs for councils in three years.	Minimal additional cost. Increased borrowing by councils will phase up over time.	Complete before April 2019

3.3 Move quickly to pilot a new ‘Somewhere Safe to Stay’ offer for preventing rough sleeping among those at immediate risk, basing services on the ‘No Second Night Out’ (NSNO) service in London. The offer includes:

- Emergency assessment hubs for people who would otherwise have no option to sleep rough for the first time, where rapid assessment is carried out and options determined and providing basic time-limited shelter for up to 72 hours which is staffed 24/7.
- Pilots offered to the 15 local housing authority areas with the highest number of rough sleepers, in order to have an immediate impact on numbers and to provide rigorous testing of issues, such as demand, success factors, move-through and risks of ‘silting up’, and possible pressures on temporary accommodation.
- A clear national definition and specification developed to ensure proper evaluation of model, including thorough understanding of local circumstances including demand and supply of services and accommodation to move on to.
- Required co-operation from local agencies to refer people on to access the support in advance of sleeping rough, which differs from NSNO which requires someone to have slept rough to access support.
- Once demands and costs are clear, consider how to roll out to all areas including potential amendments to the Homelessness Reduction Act.

Objective	Evidence	Cost	Timescale
Preventing the need for people to sleep rough in order to access services and support, providing initial assessment of need and reassuring	In London 84% of rough sleepers that access NSNO in 2016/17 did not sleep rough again.	Need for proper modelling, evidence from NSNO estimates costs of £1,800 per participant but depends on type of	Beginning before winter 2018

public that an offer exists.		service and availability of other support.	
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In addition to the Recommendations 1 and 2, the Department for Work and Pensions should:

3.4 Ensure employment support is aligned to homeless prevention goals. This includes:

- Develop guidance in consultation with homelessness organisations for Jobcentre Plus work coaches for use of the Flexible Support Fund to support homelessness prevention and response, and improving monitoring of how the FSF is spent.
- Ensure initial assessment framework to record data on homelessness and housing need and inform approaches going forward to stabilise housing and work towards employment opportunities.
- Enable and encourage Jobcentre Plus work coaches to adjust the timings and frequency of face-to-face contact with customers at risk of homelessness
- Create a specialist training module with homelessness organisations to Jobcentre Plus work coaches on homelessness and housing need.
- Introduce homelessness and housing specialists into Jobcentre Plus to lead on partnership working, training, and homelessness prevention strategies.

Objective	Evidence	Cost	Timescale
Embed prevention goals among employment support	Newcastle trailblazer demonstrating outcomes through collaboration	Minimal additional cost	Complete before April 2019

3.5 To adapt welfare reforms to make homelessness less likely among key groups. This includes:

- Lift the Shared Accommodation Rate restriction for under 35 year olds, or at a minimum widen existing exemptions for those groups proven to be at a higher risk of homelessness, including all those made a Housing First offer.

Objective	Evidence	Cost	Timescale
Increase housing options for under-35s, which represent over a third of rough sleepers in London	90% of councils report difficulties in providing shared housing to single young people.	£62.3 million should all claimants aged 25 – 34 claiming the SAR move into a one-bed. A cost of £2,027 per year per person.	Implement before Winter 2018

- Re-align Local Housing Allowance rates back to the 30th percentile of local rents and linking them with rental inflation going forward, and begin a comprehensive review LHA rates beyond 2020 taking into account the Overall Benefit Cap. Or as a minimum review the impact of the Targeted Affordability Fund with a view to understand how further increasing its funding would prevent rough sleeping and whether the suitable level of stock is available.

Objective	Evidence	Cost	Timescale
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Increase capacity for private landlords to prevent rough sleeping.	90% of councils identified reduced PRS offer for people at risk as a result of LHA freeze. Around 40% identified reduced PRP offer.	A one-off increase in LHA rates to 30 th percentile of local rents would cost around £1.2 billion.	In advance of Winter 2018
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- Simplify and streamline the process for making Universal Credit rent payments directly to a landlord if tenants have been assisted into their home through a private rental access scheme, or where a risk of rough sleeping has been identified, including those on remand or subject to short term prison sentencing

Objective	Evidence	Cost	Timescale
Increase likelihood for private landlords to prevent rough sleeping.	22% landlords say UC will make them less likely to rent to this group.	Minimal additional cost	In advance of Winter 2018

- Ensure, within the scope of the GDPR, that local housing authorities have full and timely access to information about Universal Credit claims to ensure effective integration of national and local welfare support, including LCTS, Housing Benefit (for those who remain on HB for housing costs), DHP and public sector debt.
- Review (working with MHCLG) links between Personal Housing Plans and claimant commitments under Universal Credit so that they do not result in conflicting or unrealistic demands on people.

Objective	Evidence	Cost	Timescale
Achieving operational collaboration	Inability to share data identified by front line practitioners as a limiting factor.	Minimal additional cost	In advance of April 2019

3.6 Ensure conditionality is appropriately applied to homeless people, reduce or end the use of sanctions where individuals may be experiencing housing stress. This includes:

- Extend the current homelessness easement to all people that are homeless and at risk of homelessness and those who have been helped into a new tenancy, including Housing First offers, to allow Jobcentre work coaches and Housing Options teams to stabilise housing before focusing on employment
- Monitor and ensure work coaches use flexibility in issuing sanctions to those in precarious housing position, and support to utilise the risk of rough sleeping tool as a determinant within the decision making process
- Issue further policy/guidance to require Work Coaches to take into account the haphazard nature of an individual who is insecurely housed, rough sleeping or recently out of rough sleeping

- Address operational errors leading to a break in housing benefit following an imposition of a sanction, and when errors are made consider use of hardship payments and require that the council is notified immediately to help reduce the risk of homelessness.

Objective	Evidence	Cost	Timescale
To increase understanding and flexibility within JCP to ensure sanctions do not lead to, or exacerbate, housing crisis	Homelessness people are ten times more likely to receive a sanction compared to the wider population.	Minimal additional cost.	In advance of Winter 2018.

3.7 Ensure that local housing authorities have adequate and appropriately devolved resources to support vulnerable claimants at risk of homelessness, in particular those affected by welfare reforms. This includes:

- Improve the scope for councils to improve accessibility and integration of Universal Support with other appropriate interventions for claimants at risk of homelessness and rough sleeping, in particular during the transition to Universal Credit
- Set out the support and resources that will be available to councils to transition vulnerable claimants on to Universal Credit during the ‘managed migration’ phase.
- Review Discretionary Housing Payment (DHP) to ensure that it can be used effectively to sustain tenancies and enable households to transition towards great financial stability and independence.

Objective	Evidence	Cost	Timescale
Clarifying and equipping councils with the tools to provide an effective safety net.	Cumulative reforms reduce average income by £23.01 per week per household, but minimum clarity around how councils resolve housing risk.	Minimal additional cost initially.	In advance of April 2019.

3.8 Ensure the provision of support for individuals from the European Economic Area. This includes:

- Reinstate entitlement to Housing Benefit or the housing element of universal Credit for EEA nationals with ‘jobseeker’ status.
- Give all EEA nationals with a right to reside who are homeless or threatened with homelessness a limited entitlement to benefits for six months, including Housing Benefit

Objective	Evidence	Cost	Timescale
Providing basic level of financial support promoting job outcomes.		To be calculated	In advance of April 2019

In addition to the Recommendations 1 and 2, the Department for Health and Social Care should:

3.9 Improve the understanding of the links between health and homelessness to inform provision. This includes:

- Require NHS England and NHS services to implement new data collection on housing circumstances and homelessness, across all health services, to enable the identification of risks to health and appropriate action, and monitor access and outcomes to address health inequalities.
- Commit to share, upon request by councils, medical information regarding a homelessness applicant (with their consent) so that councils can identify vulnerabilities and housing requirements.

Objective	Evidence	Cost	Timescale
Embed data and understanding of housing stress across health and housing	The need is recognised and initial scoping work is underway.	Some initial set up cost.	In advance of April 2019.

3.10 Review strategies and frameworks to better plan for housing with health. This includes:

- Support Sustainability and Transformation Partnerships, and emerging Accountable Care/Integrated Care systems, to undertake needs assessments and review their plans to improve and sustain health care services, improve outcomes and reduce health inequalities for populations at risk of being homelessness.
- Pilot an integrated fund (akin to Better Care Fund) that brings together health care funding with social care, housing and homelessness to specifically end rough sleeping, improve health and wellbeing and reduce health inequalities.
- Revisit and revise the commissioning guidance and related resources developed by the Inclusion Health Board eg, Commissioning Inclusive Health Services: practical steps
- Commit to inclusion of health workers in multi-agency teams for those rough sleeping or at immediate risk of rough sleeping
- Commit to include housing as part of any recovery or treatment plan for all patients.
- Providing specialised General Practitioner provision in high risk areas, with appropriate access arrangements.

Objective	Evidence	Cost	Timescale
Enable cross-sector action and accountability	Trailblazer learning from Oxford City Council and LB Southwark	Minimal additional costs.	In advance of April 2019.

3.11 Address systemic gaps in health and homelessness provision found in many places. This includes:

- Develop an equivalent to the Mental Health Crisis Care Concordat for homelessness and rough sleeping, and resource appropriate mental health services to meet the needs of people in order to prevent homeless and rough sleeping.
- Promote services within Psychologically Informed Environments that can respond to people who are at risk of homelessness and rough sleeping and may have experienced trauma and adverse childhood experiences.
- Targeted funding for vulnerable adults at risk of rough sleeping who do not meet social care thresholds or do not engage with services.
- Targeted funding to deliver rapid access to drug and alcohol services for individuals who are currently unable to access services because they do not meet local connection criteria.

Objective	Evidence	Cost	Timescale
Specific interventions to plug gaps in support and advice	71% increase in households found vulnerable due to mental health since 2009/10.	Additional costs to scale up provision, linked to mental health strategy	In advance of April 2018.

3.12 Provide essential support for at risk individuals around key transition points. This includes:

- Improve accountability for safe discharge from inpatient services by requiring the NHS to work with councils to ensure every patient has suitable accommodation to go to and is linked into ongoing treatment and support, and require a hospital discharge accommodation service in large hospitals or those hospitals in high risk areas.
- Requiring NHSE to measure the preventable readmission rates and accommodation outcomes on discharge, and take action to ensure progress each year.
- Review, with NHSE, the transitions between child and adult mental health services and ensure targeted support at this stage for people with multiple and complex needs.

Objective	Evidence	Cost	Timescale
Nobody becomes homeless directly upon leaving the health system.	70% of homeless people admitted to hospital are discharged onto the streets. However in Homelessness Hospital Discharge Fund programme projects, 93% of patients moving into suitable accommodation when NHS and housing staff collaborated.	Minimal additional costs.	In advance of April 2019.

3.13 Develop and support frontline health practitioners. This includes:

- Resource Health Education England to develop resources/ongoing training to support the (physical and mental) health and care workforce.
- Enable health care qualifications to include a mandatory module on the impact of precarious housing and homelessness on health and wellbeing across the population, and what action can and should be taken by the workforce to reduce this impact.
- Resource and otherwise support the use of peers in enabling access to, and delivering, services to improve health and wellbeing.

Objective	Evidence	Cost	Timescale
Positively promote and enable relationships between partners locally.	Relationships between practitioners leads success, for instance LB Tower Hamlets, Essex CC	Minimal additional costs	In advance of April 2019.

3.14 Commit to undertaking a serious case review for death of a person sleeping rough in order to inform prevention, and collate and publish numbers and review findings at the national level.

Objective	Evidence	Cost	Timescale
To set and meet objective to ensure no-one dies on the streets.	Number of rough sleeping deaths are increasing.	Minimal additional cost.	In advance of Winter 2018.

In addition to the Recommendations 1 and 2, the Ministry of Justice should:

3.15 Better understand the housing circumstances of those in contact with the criminal justice system. This includes:

- Requiring key stakeholders including prisons and probation providers to record and publish both the accommodation needs and long term outcomes of people in contact with the criminal justice system, in particular accommodation outcomes achieved for short sentence prisoners.
- Ensuring local organisations are frequently informed and updated about their role and responsibility in relation to meeting the accommodation needs of people in contact with the criminal justice system in England and Wales.

Objective	Evidence	Cost	Timescale
Understand and improve the instances of prisoners sleeping rough	Strong evidence - for instance through CHAIN - on incidence of prison leavers in rough sleeping population, around a third of the rough sleeping population have spent time in prison, and that 2.7% have prison recorded as last settled home. But other than that, understand is limited	Minimal additional cost.	In advance of April 2018.

3.16 Commit to ensuring support to find accommodation is part of rehabilitative work. This includes:

- Introduce a Housing Resettlement Services in every resettlement prison and youth justice secure estate working with all prisoners at risk of homelessness on release.
- Introduce the Youth Justice Accommodation Pathway Framework approved by MoJ and MHCLG.
- Obligate Governors to introduce integrated transition plans for all prisoners and set out multi-agency protocols for working in partnership to reduce repeat offending and rough sleeping.
- Set minimum standards for housing advice, information and support for people on remand, in prison or other custody, using Peer Mentor models to secure maximum engagement from point of entry (in line with Scottish model). This should include a housing outcome, similar to the employment outcome, in the next rehabilitation commissioning strategy.
- Revise approach to sentencing and/or prison release planning so that either suitable accommodation is available on Friday release dates and/or so that the release date is changed to enable access to suitable accommodation.

- Provide guidance to probation services to clarify what information can be shared with landlords about individuals to help them access accommodation in the private rented sector.
- Increase the level of Discharge Grant available to prisoners on release.
- Pilot a new prison leaver assessment hub service to eliminate rough sleeping among this cohort

Objective	Evidence	Cost	Timescale
Nobody becomes homeless directly upon leaving the criminal justice system.	A third of prisoners say they have nowhere to go upon release. The 2016 Chief Inspectors found support for short term prisoners, was severely lacking.	Some additional costs, to be modelled.	In advance of April 2019.

3.17 Extend the scope of legal aid in England to include all immigration cases and early legal help for all social welfare law.

Objective	Evidence	Cost	Timescale
Guaranteeing legal advice reducing risk of rough sleeping among migrant population	Most mainstream non-asylum immigration cases are no longer eligible for Legal Aid	Some additional costs, to be modelled.	In advance of April 2019.

In addition to the Recommendations 1 and 2, the Home Office should:

3.18 Develop an understanding of the links between migration status and homelessness. This includes:

- Publish data on homelessness migrants coming into contact with the Home Office, for instance the number of people homeless when detained, number of people who are homeless when released from detention, time taken to make a decision on different applications for leave.
- Create a mechanism easily accessed by councils to identify whether someone is eligible for housing, for instance the ability to check someone’s status through IT or another form at the point of access by the applicant as the information is fundamental and will affect any advice given, building on existing mechanisms such as NRPF Connect.

3.19 Clarify and communicate advice for migrant applicants. This includes:

- Provide clear, easy-to-understand advice to non-eligible applicants on housing options, including assistance/support to return to their country of origin or available in this country as appropriate
- Improve advice to councils on the complex areas of immigration status and ineligibility so local authorities can easily access information and understand circumstances of each applicant.

3.20 Enable sufficient support for refugees and former asylum seekers. This includes:

- Ensure that refugees/former asylum seekers have accommodation upon determination of right of residence in the UK by making a commitment that upon making a decision refugees are given 56 days notice to leave in line with the Homelessness Reduction Act, which will facilitate the council time to find alternative housing options across all housing sectors.
- Make a commitment that no asylum seekers with a negative decision will leave National Asylum Support Service accommodation to an unsettled address.

3.21 Make homelessness less likely among the migrant population by ending the Right to Rent policy, or introducing measures that increase the confidence among private landlords to take in tenants from another country, for instance by giving landlords a greater period of time within which to take action when someone is deemed to no longer have the right to rent.

Objective	Evidence	Cost	Timescale
Nobody becomes homeless directly upon leaving the migrant or asylum service.	The UK No Accommodation Network members saw 824 refugees who faced significant obstacles to mainstream housing after the move-on period, and had to turn away over 1,000 people from services due to limited capacity.	The extension from 28 days to 56 days notice will likely increase costs, dampened by future savings and Housing Benefit / UC costs.	In advance of April 2019.

3.22 Reducing the risks that victims of modern slavery become homelessness. This includes:

- Establish the extent to which homelessness is a driver or consequence of modern slavery, and the extent to which the use of 'No Recourse to Public Funds' increases risks around modern slavery and other forms of exploitation.
- Improve data collection on homelessness through the national referral mechanism and better data on modern slavery through homelessness systems/ H-CLIC.
- Extend the support available through the National Referral Mechanism for those who receive a positive conclusive grounds decision to 56 days in line with the Homelessness Reduction Act
- Commitment that no one receiving a negative conclusive grounds decision will leave to an unsettled address.

3.23 Resource and equip frontline staff to participate in prevention. This includes:

- Require detention centres and resettlement teams to collaborate with councils when releasing people that are at risk of homelessness, and link to national training programme to improve understanding, tolerance and consistency of approach across force areas to tackling community safety concerns.
- Support police forces to learn from instances of good practice in preventing homelessness and rough sleeping. For instance developing joint outreach approaches with housing services tailored to tackle begging, street drinking, anti-social behaviour and rough sleeping.

Objective	Evidence	Cost	Timescale
Embed prevention culture across Home Office front line staff	Lacking understanding of prevention options among enforcement professionals	Minimal additional cost	In advance of April 2019

In addition to the Recommendations 1 and 2, the Department for Education should:

3.24 Educate young people and educators around the realities of homelessness. This includes:

- Greater education for young people of the housing options that exist and how easy they are to access, and consider including in the curriculum.
- Link national training programme to spot signs of housing stress and the ‘risk of rough sleeping tool’ amongst school age children, such as truancy.

3.25 Commit to early intervention services for children and young people from chaotic home scenarios. This includes:

- Building an understanding for how childhood trauma can lead to experiences of homelessness and rough sleeping
- Promote implementation of the Care Leaver Positive Accommodation and Support Framework
- Targeted funding for care leavers with complex needs to access appropriate care and supported accommodation placements.
- Funding an accommodation lead officer in every leaving care service.

3.26 Require providers seeking to re-engage young people in education, employment and training are trained in identifying and supporting those at risk of rough sleeping. This includes:

- Enable National Careers Service advisers greater flexibility to work with other agencies, including JCP work coaches, around individuals and adjust timings and frequency of face-to-face contact dependent on their needs
- Requiring the Youth Obligation to recognise those at risk of sleeping rough and to prioritise the provision of support into employment, education or training.

Objective	Evidence	Cost	Timescale
Embed prevention culture across key Department for Education staff	Fragmentation of services and accountabilities around young people at risk of homelessness	Minimal additional cost	In advance of April 2019

The Prevention Task and Finish Group and the process for arriving at these recommendations

This paper has been developed by the Prevention Task and Finish Group (TFG) which includes representatives of the following organisations:

- Cornwall Council
- Crisis
- LB Croydon
- Greater London Authority
- Homeless Link
- Local Government Association
- MHCLG
- Shelter
- St Basils
- St Mungos
- LB Waltham Forest
- LB Westminster

The TFG met on two occasions in developing the recommendations, and in between these meetings undertook various tasks to researching and developing proposals.

There are further papers providing more detail on many of the recommendations, including on: Local Homelessness Strategies; Nowhere Safe to Stay; piloting a prison leaver's hub; refugee move-on period and; welfare reform. These can be made available on request.

The recommendations in this paper do not necessarily reflect the policy of all the member organisations of the TFG.

The TFG was chaired and hosted by the Local Government Association.