

# HILLINGDON HOMELESSNESS PREVENTION STRATEGY 2017 TO 2022

<b>Cabinet Member(s)</b>	Councillor Philip Corthorne
<b>Cabinet Portfolio(s)</b>	Social Services, Housing, Health and Wellbeing
<b>Officer Contact(s)</b>	Dan Kennedy, Residents Services
<b>Papers with report</b>	Appendix 1 - Hillingdon Homelessness Prevention Strategy 2017 to 2022

## HEADLINES

<b>Summary</b>	<p>In August 2017, the draft Hillingdon Homelessness Prevention Strategy 2017 to 2022 was approved for consultation by the Cabinet Member for Social Services, Housing, Health and Wellbeing. Cabinet is now asked to consider the outcome of the consultation process and to formally adopt the strategy.</p> <p>Given that new legislation, the Homelessness Reduction Act 2017(HRA), and revised Homelessness Guidance, are to be implemented from April 2018, it is suggested that an update and revision of the Homelessness Prevention Strategy is completed within 18 months.</p>
<b>Putting our Residents First</b>	<p>This report supports the following Council objectives of: <i>Our People; Our Built Environment; and Strong financial management.</i></p> <p>The Homelessness Prevention Strategy will complement the wider Housing Strategy and contribute to the delivery of the Council's Medium Term Financial Strategy.</p>
<b>Financial Cost</b>	No direct financial costs in the updating and revision of the Homelessness Prevention Strategy
<b>Relevant Policy Overview Committee</b>	Social Services, Housing and Public Health
<b>Relevant Ward(s)</b>	All

## RECOMMENDATIONS

### That the Cabinet:

- 1) **Notes the outcome of the consultation exercise undertaken in relation to the Council's Homelessness Prevention Strategy and has full regard to it in deciding whether to make changes to the policy.**
- 2) **Approves a revised Homelessness Prevention Strategy as appended to the report.**
- 3) **Agrees to update and revise the Homelessness Prevention Strategy within 18 months, in light of the implementation of the Homelessness Reduction Act 2017 and new statutory Homelessness Guidance.**

### Reasons for recommendation

Hillingdon Council has a statutory obligation to produce a strategy to address homelessness.

### Alternative options considered / risk management

No alternative option has been considered. The Homelessness Act 2002 requires housing authorities to publish a Homelessness Strategy.

### Policy Overview Committee comments

None at this stage.

## SUPPORTING INFORMATION

### Background to the development of the Homelessness Prevention Strategy

1. The Homelessness Act 2002 requires that local housing authorities formulate a homelessness strategy based on a review of homelessness in their area. A homelessness review was completed and presented to Hillingdon Council Cabinet in July 2016 and a draft Homelessness Prevention Strategy was presented to the Cabinet Member for Social Services, Housing, Health and Wellbeing in August 2017 and was approved for formal consultation.
2. The following headlines are included in the strategy regarding homelessness in Hillingdon:
  - Homelessness acceptances are steadily increasing– typically running at around 330+ households per year;
  - The rate of homelessness per thousand households in Hillingdon is higher than the average rate across England, but considerably lower than the average for London;
  - By far the most common 'priority need' category is households with dependent children;

- Loss of a private rented sector tenancy is responsible for most (c70%) of Hillingdon homelessness acceptances;
  - Most homelessness approaches in Hillingdon are dealt with through activity outside the statutory framework to prevent or relieve homelessness (e.g. mediation with a landlord);
  - There are around 30 homelessness approaches a week from those that do not meet statutory homelessness criteria. These are typically from single people and couples. The Homelessness Reduction Act (2017) HRA will require a strengthened response from local authorities in relation to this group of people;
  - Heathrow Airport is a significant draw for rough sleepers; many have no connection to Hillingdon;
  - The true extent of homelessness is difficult to quantify as 'sofa surfers' and those remaining as long as possible with friends or family, are not readily identifiable and are often referred to as 'hidden homeless'. Hillingdon's Strategic Housing Market Assessment has suggested that concealed households in Hillingdon have increased significantly;
  - Difficulty in acquiring suitable, affordable accommodation has meant that the number of households housed temporarily in bed and breakfast accommodation is increasingly adding to the expenditure on assisting homeless families.
3. The strategy is focused on making interventions early and taking a personalised approach to prevent households from becoming homeless wherever possible. This involves working with families on an individual basis to help resolve issues and where necessary to help them to access alternative accommodation in the private rented sector. The Council is working in a variety of ways to improve access to suitable housing. This includes developing and directly purchasing accommodation; working with housing associations to add to the supply of social sector rented properties and working with private sector landlords to make properties available for homeless households. The strategy identifies key issues and challenges and sets out priorities for preventing homelessness; securing accommodation; and securing support as follows:

#### Key issues and challenges

- Demand from homeless families for suitable, affordable accommodation remains high. There has been a change in the nature of homelessness and those affected. The pattern of homelessness includes more private sector evictions and more working households, linked to increases in rental costs in the private rented sector;
- Changes in national policy and legislation - the HRA will require councils to provide support for more people, for longer and have significant cost implications for the Council – this will mostly be in the form of providing advice and hands on assistance to secure suitable alternative accommodation to avoid homelessness.
- There is an increasing disparity between Local Housing Allowance (LHA) levels and the actual rents charged by landlords;
- There is a risk of increased homelessness due to evictions of households unable to meet rental costs following the application of the lowered Household Benefit Cap;
- Other welfare reforms that may impact on homelessness include the roll out of Universal Credit and the removal of automatic entitlement to housing support for 18 to 21 year olds;

- Potential changes to the funding for supported housing, including hostels and refuges, may reduce funding via the benefits system and include a 'top up funding pot' for local authorities;
- A combination of welfare and affordability issues, along with a buoyant housing market means that accessing an adequate supply of suitable private rented housing is increasingly problematic;
- Government does not consider that current statistics collected from local authorities to provide an adequate understanding of homelessness. These are under review and it is likely that the Council will be asked to provide additional data on homelessness demand and interventions in the future to be able to evaluate the success of national homelessness / housing policy.

#### Priorities for preventing homelessness

- Prepare for the introduction of the HRA 2017;
- Improve prevention rates of private rented sector evictions;
- Manage the impact of the reduced benefit cap;
- Review data capture, storage and reporting, including development of a supply and demand model to help anticipate future demand.

#### Priorities for securing accommodation

- Establishing a sustainable and suitable supply of affordable accommodation for homeless families;
- Target support for benefit capped families in particular to larger families, including larger single parent families, with bigger benefit shortfalls;
- Resettle households from temporary / emergency accommodation and reduce reliance on temporary accommodation (this should include a focus on accessing private rented sector accommodation complemented by social housing);
- Produce and monitor an annual social housing lettings plan setting a minimum proportion of properties to be let to homeless households;
- Investigate other options for securing housing supply;
- Reduce the cost to the general fund of housing homeless households.

#### Priorities for securing support

- Document a clear housing pathway for specific groups of vulnerable people;
- Prepare for the new supported housing funding and commissioning arrangements;
- Continue to improve integration across services i.e. housing, health, social care, employment.

4. A final section of the strategy is concerned with monitoring delivery.

### **Homelessness Reduction Act and Draft Homelessness Code of Guidance for Local Authorities**

5. The Homelessness Reduction Act (HRA) will be implemented from April 2018. The Act has significantly reformed homelessness legislation in England. It expands local authority

responsibilities by enhancing prevention with a new duty requiring local authorities to intervene earlier to prevent homelessness for all eligible applicants regardless of any priority need or local connection and a new duty to relieve homelessness to those who have become homeless. This includes a responsibility to “help to secure” accommodation to all homeless households regardless of any priority need or whether they have made themselves intentionally homeless. Local authorities, especially those in London are expecting the requirements of the Act to add significantly to workloads and costs.

6. In preparation for the new Act, DCLG has been working with housing professionals over the summer on fully revising and updating the statutory Homelessness Code of Guidance. A new draft Code of Guidance has recently been published and is being consulted on for 8 weeks from 16th October 2017 until the 11th December 2017. The Guidance provides direction on how local authorities should exercise their homelessness functions and apply the law in practice. It updates existing guidance, as well as providing guidance on new duties brought in by the HRA. The requirements for completing a homelessness review and strategy are largely as previously required, but updated to take account of the HRA and in some instances made more specific. It is suggested that a commitment be made to fully review and revise the strategy in 18 months time to take account of how the HRA is working in practice and to fully comply with the new guidance when finalised.

### **Consultation on the Homelessness Prevention Strategy**

7. The views of key partner agencies and relevant Council service areas were sought during both the production the Homelessness Review and the development of the Homelessness Prevention Strategy. The subsequent formal consultation on the draft strategy ran for 6 weeks from 4th September 2017 to 15th October 2017.
8. A copy of the draft strategy and an online questionnaire were posted on the ‘Have your say’ consultation page of the Council’s website. The consultation was open for any individual or organisation to take part, and emails were sent to a wide range of contacts to draw attention to the consultation process and encourage responses. Those contacted included:
  - A wide variety of voluntary sector organisations working in the Borough with a direct or indirect interest in homelessness
  - All Housing Associations identified as working in the Borough
  - The Greater London Authority
  - Neighbouring councils
  - Other organisations with a potential interest, i.e. health, police, Brunel University
  - Residents associations
  - Numerous officers across the Council that may have a direct or indirect interest in homelessness
  - Landlords
  - Head teachers

9. In addition, during the formal consultation period, a presentation regarding homelessness prevention and the draft strategy was included on the Member Development Day agenda on 18th September 2017; a consultative workshop was held with frontline homelessness prevention staff on 9th October 2017; and a meeting was held with social care managers on 28th September 2017. Various other meetings have been held with a variety of organisations and colleagues earlier in the process, prior to the formal consultation and have informed the development of the strategy.

### Questionnaire responses

10. There were 20 responses to the online questionnaire, the vast majority of which were positive. Two thirds of the responses were from Hillingdon residents and the remainder were from services and organisations working in the Borough. The residents responding were a mixture of home owners, private rented sector and housing association tenants, and homeless households placed in temporary accommodation by the Council. Table 1 below shows that a clear majority of respondents agreed with the identified priorities for preventing homelessness, securing accommodation and securing support as detailed in paragraph 3 above.

Table 1

	Priorities for preventing homelessness	Priorities for securing accommodation	Priorities for securing support
Strongly Agree	22%	44%	39%
Agree	44%	33%	44%
Neither agree or disagree	22%	17%	11%
Disagree	11%	0%	0%
Strongly disagree	0%	6%	6%

11. Respondents were asked to provide comments and to identify alternative priorities and approaches. Comments included a concern that the strategy needed to address the needs of young professionals; working households that are struggling to enter the housing market and may be forced to remain at home with parents for much longer than they would wish to. Some of the comments related to central government policy areas, restrictions on Local Housing Allowance rates, in particular. Other issues raised included affording greater priority to disabled people, those with learning disabilities, and single homeless people and couples; increasing access to healthcare for homeless people and to employment opportunities; and greater emphasis on tenants adhering to tenancy agreements. Working more closely with both external voluntary sector partners and colleagues across the Council was raised; and ways of increasing supply including action in relation to empty homes; and exploring the role that can be played by rent to purchase

models. Some of the suggestions made are already in place, such as making available mortgage deposits which the council assists with through the First Time Buyer Scheme.

#### Additional responses to the consultation

12. In addition to feedback via the online questionnaire, four email communications regarding the draft strategy have been received. The feedback from these and from communications with staff has reinforced the choice of priorities which are widely supported. Partnering arrangements again emerges as an area that would benefit from reinvigorating and the creation of a new homelessness forum is supported by partner organisations. Concerns were raised by our voluntary sector partners regarding Supported Housing provision under the new funding framework, with possible serious impacts for their business models. Universal Credit is seen not only as a likely driver of increased rent arrears, but also as a risk to vulnerable households, such as those with substance abuse issues, due to payments being made direct to clients.

#### Amendments following consultation

13. The consultation process has provided useful feedback on the draft strategy. Some aspects, although important, can be more directly addressed through a wider Housing Strategy than under the guise of the Homelessness Prevention Strategy. Ensuring access to housing that is affordable for young working households entering the market is a good example of this. The balance between meeting the needs of homeless households and those with other unmet housing needs will continue to be considered in formulating policy responses.

14. There were some comments that concerned the impact of homelessness on different groups of people and the relative priority afforded. Some additional text has been included in the strategy to clearly show that information relating to the Council's responsibilities in relation to equalities will be actively monitored and reviewed. The impact of specific policies on different groups will be considered as those policies are developed and equality impact assessments will be completed as appropriate.

15. The majority of comments made do not challenge the priorities, but need to be taken into account in the subsequent delivery and monitoring of the strategy. Some minor changes and additions to the text have been made either following comments received during the consultation or because circumstances have moved on, such as recent the publication of the Draft Homelessness Code of Guidance for Local Authorities. The following noteworthy additions have been included in text (brackets indicate page in strategy document):

- 'The Council will seek to ensure that the inter-relationship between [Discretionary Housing Payments] DHP and potential employment opportunities are fully considered and made use of, for instance facilitating moves closer to work.' (pg10)
- 'The rough sleeper population in Hillingdon is vastly increased by the presence of Heathrow Airport which acts as a draw and results in an atypical rough sleeper population that is largely without connection to the Borough and often having spent

many years out of the country. Heathrow is the only airport in the UK to commission their own social work charity, Heathrow Travel Care, who assist rough sleepers on a daily basis and are also assisted by local Homeless outreach teams to ensure support is provided.’ (pg14)

- ‘The Council will continue to work closely with partners in the voluntary sector to address the needs of non-priority homeless households, including rough sleepers. This will include reviewing service provision in the Borough in light of the requirements of the HRA, the recently published draft statutory guidance and the final version when available.’ (pg14)
- ‘There is a duty on children’s service to appoint a Personal Advisor to provide support for care leavers until they reach 21, or 25 if they are in full time education. The support is based on the needs of the young person as set out in their statutory Pathway Plan and may include support from housing services. Housing and children’s services work together to ensure a planned transition to independent living. Current working arrangements will be reviewed and documented to ensure compliance with requirements under both the HRA 2017 and the Children and Social Work Act 2017.’ (pg27)
- ‘Monitoring arrangements will ensure that information relevant to the Council’s duties under housing and homelessness, and equalities and human rights legislation is tracked and considered.’ (pg32)

## Financial Implications

There are no direct financial implications arising from the revision and updating of the Homelessness Strategy. DCLG have announced New Burdens HRA funding which for Hillingdon equates to £783,103 over three years from 2017/18. This breaks down to £281,444 (17/18), £257,802 (18/19) and £243,858 (19/20), with a view to the Homelessness reduction act being self-financing in 2020/21. Once final guidance is released by DCLG, further analysis of the financial impact will be carried out.

## RESIDENT BENEFIT & CONSULTATION

### The benefit or impact upon Hillingdon residents, service users and communities?

The Homelessness Prevention Strategy has a direct bearing on the Council’s vision of ‘Putting Our Residents First’. It sets out plans for the prevention of homelessness, securing accommodation and support for those who are homeless or at risk of homelessness in Hillingdon.

The Council needs to ensure that any policies or decisions in relation to homelessness take account of requirements under equalities and human rights legislation, including ensuring that policies and decisions do not discriminate against those with protected characteristics, and complying with the public sector equality duty. The Hillingdon Homelessness Strategy Review



2016, on which this strategy is based, collated available information to understand the demographics of those who are homeless including age, ethnicity, disability, mental illness, family size and composition and nature of vulnerabilities. The information gathered has informed the development of the strategy. Equality impact assessments will be carried out where relevant and appropriate to do so in the delivery of the strategy.

### **Consultation carried out or required**

The strategy has been subject to a wide ranging consultation process which is the subject of the report.

## **CORPORATE CONSIDERATIONS**

### **Corporate Finance**

Corporate Finance has reviewed this report and confirms that there are no direct financial implications associated with the recommendations regarding the Council's Homelessness Prevention Strategy. Broader financial implications associated with both the Council's duties in respect of preventing homelessness more generally and the new Homelessness Reduction Act specifically will be reflected in forthcoming iterations of the Council's Medium Term Financial Forecast as appropriate.

### **Legal**

The Borough Solicitor confirms that there are no legal impediments to the Council approving the revised Homelessness Prevention Strategy which has been subject to statutory consultation under Section 3 of the Homelessness Act 2002.

## **BACKGROUND PAPERS**

- Hillingdon Homelessness Strategy Review 2016
- Homelessness Prevention Strategy 2017 to 2022
- Draft Homelessness Code of Guidance for Local Authorities