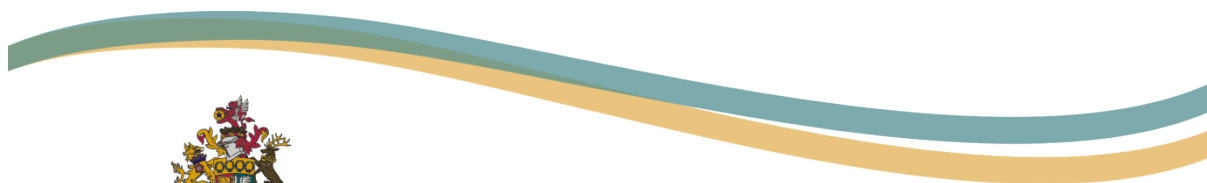




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Homelessness Prevention Strategy 2017 to 2022

November 2017



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Abbreviations used

B&B	Bed and Breakfast
BRMA	Broad Rental Market Area
CHAIN	Combined Homelessness and Information Network
CPI	Consumer Price Index
DCLG	Department for Communities and Local Government
DWP	Department for Work and Pensions
FHSG	Flexible Homelessness Support Grant
HB	Housing Benefit
HRA	Homelessness Reduction Act 2017
LHA	Local Housing Allowance
PRSO	Private Rented Sector Offer
SHMA	Strategic Housing Market Assessment
TAMF	Temporary Accommodation Management Fee
USDL	Universal Support Delivered Locally
VAWG	Violence Against Women and Girls

Foreword

Homelessness adversely affects many areas of life, including physical and mental health, school achievements and ability to access work.

The Homelessness Prevention Strategy demonstrates Hillingdon Council's commitment to preventing homelessness and supporting those who become homeless. It sets out how Hillingdon Council will work with partner agencies to intervene early to prevent homelessness wherever possible and to access suitable housing and support solutions for those faced with homelessness.

It comes at a time of significant change and challenge for homelessness services in Hillingdon. The Homelessness Reduction Act 2017 (HRA) has completed its passage through parliament, with cross party support, and marks a significant change in homelessness legislation, with a clear focus on preventing homelessness and ensuring practical help for all households threatened with homelessness.

Legislative change alone will not resolve homelessness and the challenges in accessing sufficient suitable housing are considerable. The cost of housing in Hillingdon for both rent and sale continues to rise and this is fuelling homelessness. Demand for rented properties is high and by far the most common cause of homelessness is private rented sector evictions.

Hillingdon Council is committed to continuing an early intervention and personalised approach to prevent households from becoming homeless wherever possible. We work with families on an individual basis to help resolve issues and where necessary to access alternative accommodation.

The Council is working in a number of ways to increase supply, including purchasing accommodation for use as both temporary and settled accommodation; adding to the supply of social sector rented properties through council and housing association development programmes and negotiating with landlords to secure private rented properties for use by homeless households.

The Council will continue to work collectively with a range of partners across the borough to help homeless people.

Councillor Philip Corthorne

Cabinet Member for Social Services, Housing, Health and Wellbeing

1. Introduction

The Homelessness Act 2002 requires housing authorities to have in place a homelessness strategy based on a review of all forms of homelessness in their area. This strategy sets out the approach that Hillingdon Council will take, working with other organisations, to prevent homelessness and to secure appropriate support and accommodation for homeless and potentially homeless people in the borough.

A homelessness review was completed and presented to Hillingdon Council Cabinet in July 2016. The review considered all forms of homelessness in Hillingdon including those who fall within the statutory requirements for rehousing; homeless people that do not fall within priority need groups; hidden homeless households and rough sleepers. It looked at current and future homelessness demand and at the services, support and accommodation currently provided for homeless and potentially homeless people.

The following key themes and priorities emerged from the review:

- A continued focus on prevention, maximising opportunities to maintain tenancies;
- Ongoing use of the private rented sector, where possible, to ensure households can access settled accommodation as quickly as possible;
- Ensuring sufficient quantity and the right mix of housing supply;
- Improving processes for fast turnaround of decisions, closer working arrangements with social care teams and improved use of information technology;
- Managing the ongoing impacts of welfare reform.

The results of the review and subsequent developments, including the passage of the Homelessness Reduction Act 2017 (HRA), have been used to frame discussions regarding key challenges and potential responses relating to homelessness in Hillingdon. These discussions informed the content of this Homelessness Strategy, prior to formal consultation.

The legal framework for homelessness

A summary of the Council's legal duties in relation to homelessness are set out in Appendix 1. This includes a statutory duty to secure accommodation for unintentionally homeless households who fall into a 'priority need' category. There is no statutory duty to secure housing for homeless single people and couples without children who are not deemed to be vulnerable for some reason. The clauses in the Homelessness Reduction Act will, when implemented in April 2018, substantially change the legislative framework concerning homelessness. Preparing for the introduction and implementation of new duties under the new legislation is a key part of this strategy.

Context and Challenges

Changes that are taking place and challenges that Hillingdon faces in relation to homelessness are set out in Appendix 2. These include:

- Changes introduced by the Homelessness Reduction Act which will require Councils to provide support for more people, for longer and have significant cost implications for the Council;
- Government does not consider that current statistics provide an adequate understanding of homelessness. These are under review and it is likely that the Council will be asked to provide additional data;
- 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;
- There is an increasing disparity between Local Housing Allowance (LHA), which is a flat level of housing benefit payable to tenants in the private rented sector, 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, rolled out in Hillingdon in November / December 2016;
- 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;
- A new funding model for management of temporary accommodation has been introduced from April 2017. This replaces the previous system with upfront funding for local authorities to respond to homelessness pressures;
- Proposed changes to the funding for supported housing, including hostels and refuges, will 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 housing is increasingly problematic.

Homelessness in Hillingdon

Information and statistics concerning the different types of homelessness and how they present in Hillingdon is summarised in Appendix 3. Key headlines include:

- Homelessness acceptances in Hillingdon increased by 6.4% between 2014/15 and 2015/16 from 311 to 331 before dropping back 15% to 280 in 2016/17;
- 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 was responsible for 66% of Hillingdon homelessness acceptances in 2016/17;
- Most homeless approaches in Hillingdon are dealt with through activity outside the statutory framework by preventing or relieving homelessness;
- 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 HRA requires a strengthened response from local authorities in relation to this group of people;

- Heathrow Airport is a significant draw for rough sleepers, many of who 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'. Recent research has suggested that concealed households in Hillingdon have increased¹;
- Difficulty in acquiring sufficient accommodation has meant that the number of households housed temporarily in bed and breakfast accommodation is increasingly pressured.

The following sections set out Hillingdon Council's priorities under the headings of:

- Preventing homelessness;
- Securing accommodation; and
- Securing support services.

A final section is concerned with monitoring delivery of the Homelessness Prevention Strategy.

¹ London Borough of Hillingdon Strategic Housing Market Assessment

2. Preventing Homelessness

Priorities

- Prepare for the implementation 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

A homeless prevention is an intervention that enables a person who is threatened with homelessness to either remain in their existing home or to move to an alternative suitable home that will be available for at least the following 6 months.

Hillingdon Council works with potentially homeless households as soon as they present to the Council to assist them to either remain in their currently property or to source alternative accommodation. Families at a high risk of placement into temporary accommodation are contacted on a regular basis to review progress in securing accommodation and direct assistance is given to search for private rented sector properties if this is required.

By far the most common reason for people becoming homeless in Hillingdon is eviction by private landlords. This is related to both competition for rented properties and to welfare reform changes. In particular, the lowering of the benefit cap and the continuing freeze on local housing allowance levels, pose a risk of tenants facing a shortfall between rents and benefits payable and of falling behind with rent payments.

The Homelessness Reduction Act

The HRA has some significant impacts for homelessness services and preparing for its implementation is a key priority.

A key area of work is to assess the likely impact of the changes and reshape services to implement new requirements, including reviewing how information is collected, maintained and reported on. There will be a need to reconsider work processes, staffing requirements and potential additional legal and ICT costs and additional costs for accessing accommodation.

The Homelessness Prevention Team has recently been subject to a service review and now includes increased management capacity and skills level, which will assist in responding to the new requirements. A key focus for the team will be on resettling clients currently placed in temporary accommodation. The extent to which the team may need to be strengthened will be kept under review as the implications of the recently published draft statutory guidance are considered and the actual impacts of the Act unfold in practice.

Practical implications of the Act

The HRA has completed its passage through Parliament. Implementation of the Act will take place from April 2018 and an updated Draft Homelessness Code of Guidance has recently been published to support the implementation, with a final version expected before the implementation date. This section of the strategy considers the main provisions of the Act that will impact on homelessness prevention services. These are:

- Duty to provide advisory services
- Duty to assess eligible applicants' cases and agree a plan
- Duty to prevent homelessness

The proposed new duty to relieve homelessness will be covered in the next section on securing accommodation.

Duty to provide advisory services

This measure has been included in the Act to ensure that local housing authorities provide detailed advice and information to all households in their area, including those that are homeless or at risk of becoming homeless, so that households can be empowered to seek support and solutions to their current situation.

Although local authorities already have a duty to provide advice and assistance regarding homelessness to any household in their area, the main focus for homelessness services has been statutory homeless households. The Act puts a much stronger focus on providing help and assistance to single or non priority need homeless households.

Hillingdon Council will review and document the advice and information that is currently available to households threatened with homelessness, including those that are not included within the priority need categories in homelessness legislation. This will include refreshing the advice available on the Council's website and reviewing the co-ordination of advice across housing, welfare benefits, employment, health and social care.

There is a requirement under this duty to design the service to meet the needs of specific groups of people in the area to include:

- Persons released from prison or youth detention
- Care leavers (All young people leaving care will be deemed to have a local connection in the area the local authority is providing them with care services)
- Former members of the armed forces
- Victims of domestic abuse
- Persons leaving hospital
- Persons suffering from a mental illness or impairment
- Any other group identified by the Council as being at particular risk of homelessness in its district

The recently published draft Homelessness Code of Guidance includes specific chapters related to a number of these groups and includes text on the remainder.

The Council is expected to design services to meet the needs of these groups and will ensure housing pathways and monitoring arrangements are in place for both groups named in the HRA and other priority groups in Hillingdon.

Duty to assess eligible applicants' and agree a plan

The existing duty to assess the housing requirements of all homeless applicants is to be strengthened. This duty will be owed if the Council is satisfied that an applicant is homeless or threatened with homelessness and they are eligible for assistance. The duty applies regardless of whether the household falls into one of the priority need categories. The duty also specifies that the assessment of the applicant's case must include:

- The circumstances that caused the applicant to become homeless or threatened with homelessness;
- The housing needs of the applicant including what accommodation would be suitable for the applicant and other members of their household;
- What support would be necessary for the applicant and other members of their household to be able to have and to retain suitable accommodation.

Following the assessment, the Council will need to work with the applicant to agree a small number of key steps that are tailored to their needs and that are most relevant to them securing accommodation. The agreement of actions that the applicant and the Council will take must be recorded in writing.

Hillingdon Council's Homelessness Prevention Team is already well placed to respond to this provision in the Act having adopted an early intervention approach, and having introduced Personal Housing Plans for homelessness applicants in May 2016. These plans encourage applicants to be proactive and realistic in managing their homelessness situation and in seeking appropriate accommodation.

Initially formalised plans were only put in place for homeless households that fell within the priority need categories. The use of Personal Housing Plans as a tool for collaboration with service users will continue to be rolled out for all households that seek assistance from the Council and are eligible, homeless or threatened with homelessness, regardless of priority need.

This is likely to mean a substantial increase in casework. During 2016/17 there were a total of 2,393 households that sought advice regarding homelessness of which 1,236 were eligible, priority need clients, that were homeless or had a homelessness threat. In future, we can expect that in excess of 2,393 households will have a full assessment undertaken and have a plan put in place. These 2,393 do not include approaches that would not have progressed to this stage, an initial 'triage' having already been completed by the Council's Contact Centre. An assessment will be made regarding the additional number of approaches currently dealt with by the Contact Centre that will require a Personal Housing Plan. The Act may well also raise expectations and encourage an unknown additional number of people to approach the Council.

The Council will review process and rewrite procedure notes to ensure that the new requirements are capable of being implemented, managed and recorded. Housing plans must be kept under review until it is considered that no further duty is required. The proposed legislation also sets out what must happen if no agreement on a plan can be reached; if the requirements of a plan change; and if there is a deliberate and unreasonable refusal to co-operate. All of which will need to be recorded and be capable of reporting on.

Duty to prevent homelessness

This measure extends existing homelessness prevention requirements from 28 to 56 days so that help is provided at an earlier stage. The intention is for people to seek help and advice at an early stage, to allow time for an alternative property to be identified and to avoid becoming homeless.

The duty applies regardless of priority need or intentionality. It is owed if the Council is satisfied that the applicant is threatened with homelessness and is eligible. The duty requires that the Council take reasonable steps to help an applicant to secure that accommodation does not cease to be available for their occupation. There is uncertainty as to what 'reasonable steps' constitutes and so the precise impact on the Council is still unclear.

The Government has made available a fund for prevention trailblazers that will run from 2016/17 to 2018/19. The trailblazers will build an evidence base on 'what works' to prevent homelessness, and work with other areas to share best practice. Individualised advice is seen as a key aspect. Hillingdon Council's Homelessness Prevention Team will seek to learn from emerging good practice and will continue to develop a case management, person centred, approach to homelessness prevention for both priority and non priority need clients. The range of reasonable steps offered will be developed and monitored, enabling both new approaches and solutions to be trialled and an understanding of what works to be developed.

Key elements in the Councils approach to preventing homelessness are:

- Preventing private sector evictions; and
- Working with households affected by the benefit cap, including prioritising employment

Success in tackling these issues will be monitored.

Sustaining tenancies and preventing private sector evictions

The Council's tenure neutral Housing Support Team makes timely interventions to sustain tenancies and reduce homelessness. Support is time limited and focussed where high risks of tenancy failure present in order to maximise the potential for successful tenancies and independent living. The team actively promotes early intervention and works creatively with partners agencies to address presenting needs and mitigate the risk of tenancy failure and homelessness.

Given that private sector evictions are by far the most common cause of homelessness, any action that the Council can take to reduce the number evictions

will have a positive impact on homelessness. Evictions take place for a variety of reasons, many of which the Council has no control over, including a buoyant housing market which means that landlords are able to achieve higher rents. There are, however instances where the Council is able to intervene to prevent an eviction process taking place. If a person presents as threatened with homelessness from a private sector tenancy, the Council will always contact the landlord to see whether it is possible to prevent eviction. Where the Council is unable to persuade a landlord to continue the tenancy with the existing tenant, the Council will explore whether the landlord is prepared to work with the Council in relation to homelessness with an alternative client. One option being considered is to trial a presence at County Court to evaluate the impact that this can have on preventing evictions.

Working with households affected by the benefit cap

Ensuring that tenants are well informed regarding forthcoming changes that will affect them is a key part of the strategy to prevent homelessness.

A dedicated project group, led by the Homelessness Prevention Service, has been established to manage the impact of the reduced benefit cap in Hillingdon. The group includes a range of council officers and benefits staff and staff from DWP.

Surgeries have been held at the Council offices to advise those likely to be affected regarding their options. These have stressed the importance of finding work and have discussed possibilities for finding cheaper accommodation. Clients are signposted to the Job Centre where they are able to access tailored support from P3 who have been commissioned to work with clients affected by the benefit cap to assist them to find work.

The benefit cap is particularly problematic for larger families and especially those headed by a single parent as employment and child care arrangements are often more difficult to secure.

Discretionary housing payments

The availability of Discretionary Housing Payments (DHP) is an important resource in preventing homelessness and assisting in accessing accommodation. During 2016/17 there were 1,723 claims for DHP, of which 1,104 have been awarded. The use of DHP will continue to be monitored and periodically reviewed. In particular, the Council will seek to ensure that the inter-relationship between DHP and potential employment opportunities are fully considered and made use of, for instance facilitating moves closer to work.

Data capture, storage and reporting

There is an existing requirement for the Council to provide quarterly statistics to DCLG relating to homelessness on a form known as the P1E. DCLG have confirmed an intention to redesign the P1E form to collect household level data. It currently only collects aggregated figures for statutory homeless, and limited data on prevention and relief. The intention is to collect more detailed data to better inform policy and understand homelessness. A small number of trailblazers are working with DCLG to

help them design, test and develop initial proposals for new P1E data requirements. Draft requirements will be shared with local authorities when available in 2017.

Hillingdon Council will review current data collection systems and consider how accurately, comprehensively, and efficiently they are currently utilised. It will also review the capabilities of current IT systems to respond to potential additional data requirements and the efficacy of current reporting arrangements and how they might be improved.

Working with households threatened with homelessness early in the process and ensuring the advice available reflects the options available locally will assist households to take advantage of opportunities. This does not however address the underlying issue that in areas of high demand, including Hillingdon, demand far outstrips supply for both social sector and private rented sector housing. Supply issues are considered further in the following section.

3. Securing Accommodation

Priorities

- 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
- Produce and monitor an annual social housing lettings plan setting a proportion of properties to be let to homeless households
- Investigate more radical options for securing housing supply
- Reduce the cost to the general fund of housing homeless households

Acquiring a sufficient supply of suitable accommodation that is both affordable to the client and is available without incurring unreasonable costs to Council's general fund is the most significant challenge for this strategy. At present the demand for accommodation for the Council's homelessness functions exceeds supply and consequently this is a worsening situation. There is also a potential for additional accommodation demands as a result of the requirements of the HRA.

A supply and demand model has been developed to monitor current activity and make projections for future requirements. Further refinements to the model are being made (See Section 5).

Hillingdon Council's responsibilities for securing accommodation

The Council has responsibilities to secure accommodation for households that are owed the main homelessness duty, and to provide interim accommodation while homelessness enquiries are being completed. It also has responsibilities for accommodation in some other instances such as when a section 17 duty is owed under the Children Act.

Hillingdon Council works with households to prevent them from becoming homeless in the first place, sometimes assisting them to remain in their existing accommodation and in other instances by helping them to secure alternative accommodation.

There is also a requirement for the Council to provide advice and assistance for households that are not owed the main homelessness duty which includes assisting them in securing accommodation.

Proposed new duty to relieve homelessness

The relief duty, included in the HRA requires local authorities to take reasonable steps to help to secure accommodation for any eligible person who is homeless. The duty lasts for up to 56 days, and those who have a priority need will be provided with

interim accommodation while the Council carries out reasonable steps. As with the prevention duty, the impact on the Council and on homeless households will be dependent on what constitutes reasonable steps. The type of help that is or isn't considered reasonable is not yet clear but reference has been made to rent deposits or bonds and mediation. Both priority and non priority need applicants will be entitled to assistance from the Council however, only those applicants with a priority need will be entitled to interim accommodation. While the Government has expressed a preference for longer tenancies, the relief duty can be brought to an end with a six month assured shorthold tenancy.

Local authorities will not be expected to source and secure accommodation for a person in each instance. 'Help to secure' means that the Council would be able to provide support and advice to households who would then be responsible for securing their own accommodation. It will still be open for Council's to secure accommodation under the prevention and relief duties when they think it is a reasonable approach, for example, when a vulnerable household is involved. The checks that take place for Private Rented Sector Offers under the current legislation are being extended to vulnerable households placed in the private rented sector. These include, for instance, whether there is a valid gas safety certificate, a carbon monoxide detector or whether the landlord is a 'fit and proper' person.

As with homelessness services currently, the biggest challenge from the Act is in accessing suitable affordable accommodation in the private rented sector, whether as temporary accommodation, or as a homelessness prevention or for discharge of the homelessness duty.

Hillingdon's approach to securing accommodation

Homeless Households with a priority need

Hillingdon Council's preferred approach to housing homeless households is to secure private rented sector property in the borough of Hillingdon. If possible, this is secured as a preventative measure, prior to a family becoming homeless. If prevention does not prove possible and a homelessness application is taken, the preference is for discharge in the private rented sector.

Lettings in the social sector are made available to homeless households with an appropriate priority banding, however social housing is a limited resource and in addition to 273 homeless households on the housing register (as at 23rd October 2017), there are 926 council and housing association tenants registered for a transfer, and 515 other applicants registered for social housing.

If a private rented sector or social sector discharge is not available, a placement in temporary accommodation is made pending the availability of a property where the homelessness duty can be discharged. As with permanent accommodation, temporary accommodation is sought within borough as far as possible. The Council uses some of its own stock for temporary accommodation; leases property for use as temporary accommodation directly from private sector landlords; and makes placements into private rented sector accommodation leased via housing associations and other organisations. In the absence of availability of these types of

temporary accommodation, a placement will be made in bed and breakfast, nightly paid accommodation, which, as far as possible will be both within the borough and self contained. Local authorities are not permitted to place families with children in non self contained bed and breakfast accommodation for more than 6 weeks or to use such accommodation at all for 16 or 17 year olds.

Non priority homeless households and rough sleepers

Advice and assistance is available to all single people, however there is a distinction to be drawn between those who have support needs and those who have an accommodation need only. Some of those who are vulnerable with support needs will have a priority need, as defined in relation to homelessness statutory duties (see Appendix 1), whereas others will have some support needs without being considered 'vulnerable and in priority need'. In certain circumstances financial assistance, in the form of a voucher, can be provided to assist people in accessing accommodation. Support services, including accommodation for those with support needs, are considered further in Section 4.

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 are 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.

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.

Location of accommodation

Where possible, homeless households are rehoused in Hillingdon, however difficulties in accessing housing locally has meant that looking further afield for accommodation is sometimes necessary. Placements are made following a detailed review of the households' circumstances and in accordance with the Temporary Accommodation and Private Rented Sector Offer (PRSO) Placement Policy approved by Hillingdon Council's Cabinet in May 2016. An assessment is currently completed for all households that are considered homeless or threatened with homelessness, in priority need and eligible to assess their circumstances, accommodation and support needs. This includes an assessment of whether they need to remain in borough or if a suitable out of borough placement can be made. Statistical information regarding the accommodation requirements from these assessments, including the number of bedrooms needed from a supply of homes in Hillingdon and in other areas will feed into the supply and demand model (see Section 5 on delivering the strategy). The assessments will be extended as necessary to meet the requirements of the HRA.

Current supply and challenges

Accessing accommodation for homeless people is a very real challenge for this strategy, whether it is social sector or private sector accommodation. Over the last few years it has become more and more difficult to find affordable, suitable accommodation for homeless households. In reality if a family is homeless and in priority need, it is unlikely that a property will currently be immediately available for discharge and there will be a need for temporary accommodation to be provided in the interim. If possible this will be a leased property, but an initial placement is currently likely to be in emergency bed and breakfast accommodation. This does not provide a good solution for homeless families and is costly to the Council. Consequently establishing a sustainable and suitable supply of affordable accommodation for homeless families is a fundamental issue for this strategy.

The difficulties in accessing accommodation, along with changes to the way in which Councils are able to discharge their homelessness duty, has meant that there have been significant changes in the type of accommodation that is used in Hillingdon used to house homeless households.

Prior to the Localism Act 2011, the model for housing homeless households in Hillingdon, was generally, to use emergency accommodation during the homelessness decision making period. Subsequently, those accepted as homeless would be housed in a large and stable supply of leased accommodation prior to being rehoused in a Hillingdon Council owned or Housing Association property. As the homelessness duty can now be discharged in the private rented sector, other than for those households still undergoing homelessness enquiries, the only reason for maintaining a stock of temporary accommodation is if there is a lack of supply of affordable settled accommodation in both the social and private sector. There are currently difficulties in accessing sufficient supply in either the social or the private sector. It will not, however, be a sustainable solution to continue to increase the number of households residing in temporary accommodation, especially given forthcoming changes to the funding arrangements for housing benefit and the temporary accommodation management fee. It is consequently an imperative that alternative solutions to the difficulties in accessing supply for homeless households are found.

To date, the main change in temporary accommodation has not been in the overall number of units, but in the reduction in private sector leased units and a corresponding increase in the use of bed and breakfast accommodation.

Difficulty in acquiring sufficient accommodation has meant that the number of households housed temporarily in bed and breakfast accommodation is substantial. At 23rd October 2017 there were a total of 591 households in temporary accommodation of which 217 were in emergency bed and breakfast placements.

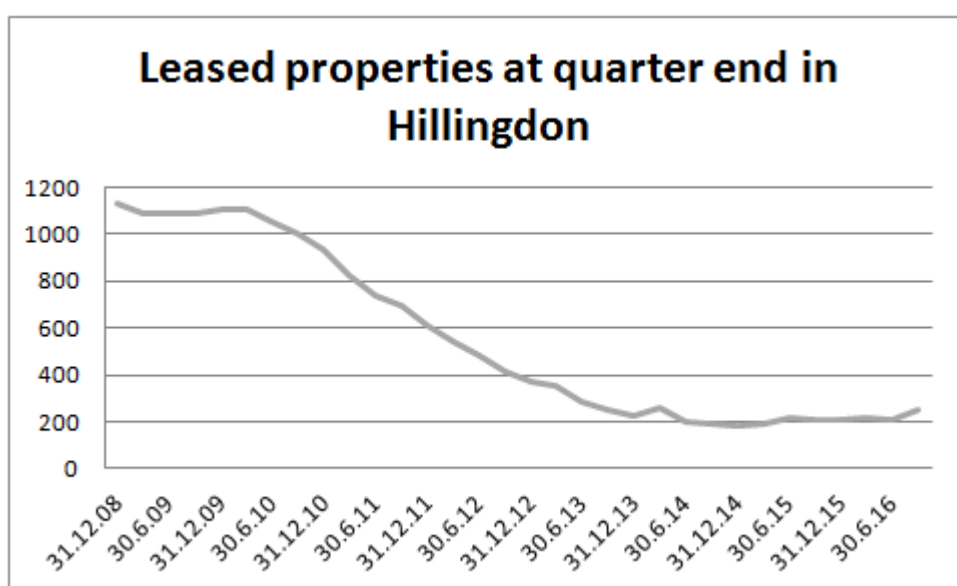
A breakdown of homeless households placed in emergency or temporary accommodation at this date is shown in table 3.1 below. Leased accommodation via housing associations, other private managing agents, or leased directly by the council accounted for 190 units at this time.

Table 3.1: Households in Temporary Accommodation

Type of Accommodation	Number of households
Bed and breakfast	217
Council owned short life accommodation	174
Private sector leased accommodation	84
Housing association leased schemes	106
Total	591

Chart 3.1 shows how the number of leased units in Hillingdon has reduced since 2008.

Chart 3.1



Affordability and benefit issues in relation to private rented sector housing

The Housing Benefit payable in the private rented sector / Local Housing Allowance (LHA) was based on lower level rental costs (30th percentile) for different properties sizes in a 'Broad Rental Market Area'. It was subsequently intended that it should rise in line with the Consumer Price Index (CPI), but rates have been frozen for 4 years from 2016. Meanwhile private rent levels have been substantially increasing and are expected to continue rising. This has resulted in an increasing shortfall between the benefit payable and the rent charged. There is likely to be a steady rise in the housing benefit shortfall over the next few years and, unless housing benefit is made more generous, low income households are not likely to be able to find the money to fill the gap.

National level data shows that there has been a rise in the proportion of middle-income households receiving housing benefit, and 47% of all families receiving LHA in the private rented sector are in work, nearly double the proportion it was six years ago.

LHA rates for private rented accommodation in Hillingdon are currently payable at the rates shown in table 3.2.

Table 3.2: LHA rates in Hillingdon

	LHA monthly rates April 2017	
	Outer West London BRMA	North West London BRMA
Shared rate	£357.11	£378.73
1 bed	£761.54	£829.31
2 bed	£995.15	£1050.10
3 bed	£1180.83	£1313.00
4 bed	£1378.00	£1622.40

Table 3.3 below provides a snapshot of local median monthly rents in the London Borough of Hillingdon as at 6th January 2017 for comparison. The LHA rates are all well short of the asking rental costs. This gap between the LHA and rents has been the most significant issue in relation to accessing the private rented sector and has resulted in London boroughs paying higher incentives to secure properties.

Table 3.3: Median rental cost in Hillingdon

Median rents in Hillingdon at 6th January 2017					
	Room	1 bed	2 bed	3 bed	4 bed
Northwood	£575	£1,049	£1,400	£1,751	£2,995
Harefield	£550	£949	£1,549	£1,499	£3,501
Ruislip	£594	£1,101	£1,300	£1,651	£2,201
Ickenham	£568	£1,101	£1,398	£1,799	£2,899
Uxbridge	£585	£1,001	£1,274	£1,599	£1,775
Cowley	£600	£901	£1,249	£1,495	£1,725
Yiewsley	£550	£1,000	£1,300	£1,525	£1,700
West Drayton	£500	£1,049	£1,300	£1,551	£1,700

Source: Home.co.uk

Note: Information based on a snapshot of a small number of properties available to rent in each area on the day

The benefit cap

The benefit cap has been less of an issue in relation to supply to date, but may become more of an issue now that it has been reduced. The cap may impact on homelessness demand as households with a shortfall may fall into rent arrears and have an increased risk of eviction.

There is also a more direct impact where those currently housed in temporary accommodation are affected by the benefit cap.

Addressing the impact of the benefit cap as it affects homeless households will be a priority for the benefit cap project team. There are particular difficulties for capped single parents with larger numbers of children, as the shortfall may be enough to make any property unaffordable and because of child care issues, finding work can be more problematic. It is important that the available support is focussed on the

needs of these families to find solutions for their situation via housing and other means as necessary.

Changes to the Temporary Accommodation Management Fee

If accommodation is being used as temporary accommodation, different LHA rates apply. From April 2017 the funding regime for temporary accommodation has changed. Previously, the Department for Work and Pensions (DWP) paid local authorities in London a £40 per week management fee for temporary accommodation, except where a placement was in non self-contained bed and breakfast, or accommodation (including hostels) from the authorities own stock.

For those placed into non self-contained accommodation, Housing Benefit (HB) subsidy is limited to the 1 bedroom self-contained LHA rate based on the location of the property.

For those in self-contained licensed and short-term lease accommodation, the maximum HB subsidy was determined by using 90% of the LHA rate, fixed at the January 2011 figure for the size of the property, plus an element for management costs of £40 per week for authorities in London. The scope includes properties leased by the council and housing association leasing schemes to either discharge a homelessness function or to prevent the person being or becoming homeless. Since the changes subsidy can no longer be claimed by the Council for the £40 per week management element

The 2015 autumn statement confirmed that the management fee would end on 31st March 2017 and be replaced by new arrangements that would provide up front funding to local authorities to manage homelessness pressures. Local authorities are now given funding directly through the Flexible Homelessness Support Grant (FHSG), to manage temporary accommodation and homelessness pressures. The use of FHSG is not limited to the provision of temporary accommodation and can be used flexibly to prevent or deal with homelessness.

The call on the pot of funding made available includes both properties used to provide interim accommodation pending discharge of the homelessness duty and accommodation that is leased on a temporary basis where households have been placed to prevent homelessness.

The government points to the flexibility provided by an upfront grant as part of the resourcing for homelessness strategies, alongside other resources such as Homelessness Prevention Grant and Discretionary Housing Payment.

The TAMF arrangements applied to temporary accommodation properties made available for homelessness prevention, as well as for those provided while enquiries are ongoing, and those used as interim accommodation for households accepted as homeless. Prevention properties are not included in the homelessness temporary accommodation figures as shown in table 3.1 above, and are not usually tracked. Some of these may have subsequently been re-used for households owed a duty.

As a limited funding pot is available, and the Government is not likely to incentivise an increased use of temporary accommodation, it will be in the financial interest of

the Council, as well as a benefit for homeless households if use of temporary accommodation can be reduced.

Demand from homeless households

The demand for housing for homeless households consists of new clients approaching the council and what can be considered a backlog demand from households currently housed in temporary accommodation and awaiting rehousing.

The number of households accepted as owed the main rehousing duty is currently about 24 a month, which equates to 292 over a 1 year period. In the period from April 2016 to January 2017, there was an average of 10 placements a week into temporary accommodation. These are households where homelessness has not been prevented and in most instances interim accommodation is necessary. There is an additional call on private sector supply from households where homelessness is prevented by securing alternative accommodation. Properties sought to discharge the homelessness duty in the private rented sector are accessing the same pool of properties as those sought for prevention. Some changes to the way in which supply and demand are monitored will assist in providing clarity regarding supply challenges and enable better projections of supply and demand needs by bedsize and type of provision.

Homeless households that have been accepted as owed a rehousing duty comprise the vast majority of households that are currently housed in temporary accommodation or emergency / bed and breakfast accommodation. Subsequent to the Localism Act 2011, the duty can be discharged in the private rented sector and resettling these households and reducing reliance on temporary accommodation is a key priority. Those with a 2 or 3 bedroom need form the largest number of these households, but a significant proportion are larger families with a need for a 4+ bedroom need. There is a generally a more significant cost to the Council's general fund for larger households and there is sometimes a need for families to be split across more than one room in emergency accommodation. Those with a shared accommodation or 1 bedroom need form the smallest proportion of these households housed in temporary accommodation. In the region of, half of households in temporary accommodation have been there since before the beginning of 2016 and around a quarter since before the beginning of 2015.

The supply of properties available on leased schemes has declined dramatically and this has meant more households being housed in emergency / bed and breakfast accommodation. By focusing on resettling households from temporary accommodation, remaining leased accommodation can be freed up for use by households currently placed in bed and breakfast.

The number of households that are accommodated in bed and breakfast under Section 17 of the Children Act has reduced from 30 at the end of June 2016 to 17 at the end of December 2016. These families are being actively case managed to achieve move-on as quickly as possible.

Social sector supply

Social sector housing is a scarce resource, with demand far exceeding supply. The priorities for lettings in the social sector are set out in Hillingdon's Social Housing Allocation Policy. The objectives of the policy are to:

- Provide a fair and transparent system by which people are prioritised for social housing;
- Help those most in housing need;
- Reward residents with a long attachment to the borough;
- Encourage residents to access employment and training;
- Make best use of Hillingdon's social housing stock; and
- Promote the development of sustainable mixed communities

The policy complies with requirements to provide reasonable preference to certain categories of applicants, including those accepted as being owed the main homelessness rehousing duty. In addition, the Council will ensure that greater priority through 'additional preference' is given to applicants who have a long attachment to the borough; are working; members of the British Armed Forces or childless couples. Homeless households that have been resident in the borough for 10 years or more have a higher housing register priority than homeless households that have more recently moved to the borough.

Allocation policy review

The Council has reviewed its Social Housing Allocation Policy in the light of a number of recent developments in case-law.

As a general rule, only persons with a local connection comprising at least 10 years' residence in the borough qualify to join the housing register. There are a number of exceptions to this rule. Following an extensive consultation process, in which the Council's proposals were strongly supported, changes to the Social Housing Allocation Policy were approved in December 2016. The policy was amended to provide clarity that applicants that fall within the statutory reasonable preference groups, including those who are statutorily homeless, are included in the exceptions to the 10 years' residence requirement and will have access to the housing register.

Local priorities continue to be recognised through the qualification and additional preference rules. Hillingdon Council's clear priority is 'putting residents first' and those with a strong connection to the borough continue to be afforded priority in the framing of the Social Housing Allocation Policy. The impact of the changes will be monitored and reviewed.

Although the Council seeks to utilise the private rented sector as far as possible to house homeless households, rehousing of families from temporary accommodation is still at present most likely to be as a result of a social sector tenancy having been secured. Continuing and worsening difficulties in accessing the private rented sector mean access to social sector accommodation continues to be an important resource for rehousing homeless households.

In order to strike the right balance of allocations to different groups and to manage the cost of homelessness, an annual lettings plan will be published each year. This will be monitored on a monthly basis and if monitoring shows that the allocation target set out in the plan is not being achieved, the council reserves the right to enhance access by advertising or by directly allocating some properties to specific groups.

Social sector lettings activity

The stock of social housing in Hillingdon consists of approximately 10,000 Council homes, and over 7,000 registered provider homes. Social sector lettings, combining social and affordable rent, for the years 2014/15 and 2015/16 are shown in table 3.4 below. This covers all lettings, not just those for homeless households. During 2015/16 there were 211 social lettings to homeless households equating to 17 or 18 a month. 2015/16 was an exceptional year for social lettings. During 2016/17 there were 410 lets overall, of which 97 were to homeless households.

Table 3.4 Social Sector Lettings in Hillingdon

	General Needs			Supported Housing		
	Local Authority	Housing Association	Total	Local Authority	Housing Association	Total
2014/15	310	246	556	116	306	422
2015/16	438	342	780	104	312	416

It is the general needs lettings that are most relevant for homeless households. There are some homeless placements in supported housing; these are usually older people in sheltered housing but the majority of homelessness applicants are working age. Monthly monitoring of social lettings to homeless households by bedsize will be included in the supply and demand model.

New social sector supply

New supply has a significant impact on the availability of lettings as all of the housing in a development scheme comes on stream within a relatively short period, whereas with existing housing only a small proportion is likely to turnover and become available for letting each year.

Hillingdon Council is itself developing a number of sites to add to the supply of homes. In addition some buildings are being converted for residential use and some properties are being extended to provide larger homes.

Right to buy receipts are being used on various sites to provide 30% of the development costs as allowed within the rules governing the use of right to buy receipts. The mix of homes on redevelopment sites is being planned to ensure that, wherever possible, some larger family housing is included in the dwelling mix. The Council is also actively considering the acquisition of some other particular groups of properties for use as either additional settled Council homes or as temporary accommodation.

Delivery of Affordable Rent housing by the Council's Housing Association partners is scheduled to increase substantially in 2017/18 with an increase in both overall numbers and of 3 and 4 bedroom properties. As new schemes come on stream consideration will be given to the need for local lettings plans including considering whether lettings to a greater proportion of homeless households for a specific scheme is considered appropriate at the time taking into account demand levels and the ability to access private rented sector accommodation.

The Council will monitor the delivery of new housing supply and will continue to deliver an appropriate mix of homes, through inhouse developments and by encouraging delivery by partner agencies. In addition to new build properties, the council is completing conversions and extensions to add to the supply of family sized accommodation.

Nominations agreements with housing associations will be monitored to ensure that these are delivering as they should and this will include monitoring of lettings by housing associations to homeless households.

Right to Buy, 'buy-back' scheme and other property acquisition

The Council has invested in buying back some properties previously sold under the Right to Buy, to add to the supply of suitable housing. Following successful purchases in 2015/16, a new programme was progressed in 2016/17 with a focus on concentrating resources on the most pressing need for larger properties. The programme was further extended into 2017/18.

Approval was also given to acquire a specific property for use as a homeless hostel. Purchase has been completed, and alterations have been carried out to create some larger units within the dwelling. This acquisition is helping to reduce the number of households in expensive Bed and Breakfast Temporary Accommodation.

The Council will monitor the acquisition of previous Right to Buy properties and other purchases and will continue to evaluate opportunities to acquire additional properties.

Releasing under-occupied Council housing

The Council makes available incentives to release under-occupied housing. This helps to free up family housing which is much in demand by homeless households and by other households on the Council's housing register. During the period April 2016 to March 2017, initiatives under the Home Release Reward Scheme have led to the release of 13 two bedroom properties and 15 three bedroom properties. A further 13 properties were released between April 2017 and September 2017. These comprised 3 two bedroom properties, 3 three bedroom and 1 five bedroom.

This activity will continue to be supported and the incentives and assistance offered under the scheme will be kept under review.

Robust action to tackle housing fraud

The Counter Fraud Team investigates suspected cases of Social Housing Fraud which are identified either by direct referral from Housing Officers, data matching

exercises or telephone calls to our fraud hotline. In 2016/17 the team recovered 64 Council properties which are now available to be re-let to residents in genuine housing need. From April to September 2017, a further 21 properties were recovered. Social housing fraud will continue to be robustly tackled.

Private Rented Sector Supply

There are also some additional challenges posed by legislative and policy changes including from the:

- HRA
- Local Housing Allowance rates
- The lowered benefit cap and
- Temporary accommodation management fee

Private Sector Leased Schemes

There are two types of scheme that are winding down completely. A West London contract for Privately Managed Accommodation has expired. This scheme previously housed in the region of 55 households that were a mixture of those owed a housing duty and those placed to prevent homelessness. The leases have been left to over-run and the number has been in a slow decline since 2015. As at October 2017 there were 10 properties remaining. A few have transferred onto a Housing Association Leasing scheme (HALS/HALD) but most are no longer available for use by Hillingdon Council in relation to homelessness.

The leases have expired on schemes via Orchard and Shipman and Paradigm. Many of these properties continued to be let beyond the end of the lease for some time, but they are now coming to an end. The Council handed back 145 properties during 2015/16. There are now just 15 Orchard and Shipman properties continuing to be let on this basis. Additional properties have been taken on or transferred to a HALS arrangement with Orchard and Shipman.

There are a number of Registered Providers that we have leasing arrangements with in exchange for nomination rights to the properties. These properties are used as interim accommodation for homeless households and to relieve homelessness. The key partners that Hillingdon Council works with in this way are Paradigm Housing Group; Notting Hill Housing Group; Shepherds Bush Housing Association; Genesis Housing Association; and Orchard and Shipman.

To maximise the benefit from these properties a more active programme of management will be introduced to assist clients to move on or to arrange for conversion to a private rented sector discharge.

New leasing schemes

In an effort to replace the expiring schemes, there have been some new arrangements put in place, but with limited success.

Due to the rapidly changing market, landlords are not always offering the opportunity for Hillingdon to renew leases and properties are sometimes lost to other authorities

and to open market rentals. There is pressure to both complete deals quickly and to make larger incentives available.

PAN London Direct Purchasing Scheme

Hillingdon Council is part of a PAN London Direct Purchasing Scheme (DPS) which has replaced the old 'PMA' scheme for procurement both inside and outside London. The scheme has been very slow and numbers are expected to remain low. Many other councils are running their own schemes and procuring properties directly to remove competition with other authorities. Hillingdon Council will consider the option of establishing a new vehicle for procuring private rented sector properties via managing agents and the terms of a potential offer.

In-house leasing arrangements

A new Hillingdon Council internal scheme offering guaranteed rental payments (Private Sector Lease) was commenced in May 2014, since then 73 properties have been signed up with 3 year leases. An evaluation of likely end of lease dilapidation / handback costs is being undertaken, before consideration is given to expanding this scheme any further. Visits are being made to assess the likely costs from a sample comprising of the first 10 properties.

Finders' Fee

The other arrangement that Hillingdon Council operates directly with landlords is a finders' fee arrangement. Under this arrangement an incentive is paid to the landlord in exchange for accepting the nomination of a homeless or potentially homeless household. The tenancy offered must be for at least one year and consequently these properties are ideal for discharging homelessness duty with a private rented sector offer. The Council will continue to seek to maximise the number of properties made available through this arrangement in Hillingdon. There were 43 secured in 2016/17 and a further 34 in the first 6 months of 2017/18.

Bed and Breakfast procurement

Officers work to reduce costs from both existing and new landlords on shared and self-contained bed and breakfast units. Block booking arrangements are used to secure discounted rates.

All bed and breakfast accommodation is regularly visited to verify occupancy details. In 2016/17 the Counter Fraud Team cancelled 16 cases as a result of non-occupation. Between April and September 2017, occupancy checks have identified a further case that has been cancelled and there are 3 cases under investigation for non occupation.

Housing Zone

The Council and the Greater London Authority have agreed to establish a Housing Zone for Hayes to boost housing delivery and result in new housing in the borough. The Housing Zone area includes delivery of Crossrail together with a range of major regeneration schemes.

Throughout the delivery of the Housing Zone, the Council will make sure that the planned outputs, in both private and social sectors, relate to the housing and wider Council priorities including the needs identified in this strategy.

Seeking alternative solutions to supply issues for homeless households

It is clear that despite efforts made to date, securing sufficient housing supply for homeless households is a continuing difficulty and consequently more radical solutions need to be investigated. One such solution is to investigate options for establishing one or more council owned companies to provide rented housing. This would provide an additional resource to housing currently within the housing revenue account. This could be used to provide housing for homeless households, other households in housing need and/or as an income generator to cross subsidise alternative solutions.

Issues related to the supply of supported housing are covered under the next section 4 on Securing Support.

4. Securing Support

Priorities

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

For some households that become homeless, their only need is for accommodation, however many homeless households also have some support needs.

Structural factors related to homelessness such as poverty, housing supply and affordability, unemployment and welfare issues may result in households that do not have any support needs becoming homeless.

Personal, individualised factors and experiences related to homelessness are more likely to mean that a household has additional support needs as well as their accommodation needs. These include; poor physical health, mental health problems, alcohol and drug issues, bereavement, experience of care, and experience of the criminal justice system. There is often a complex interplay between structural and individual factors.

The homelessness review detailed the types of floating support and supported housing that is currently provided in Hillingdon for homeless and potentially homeless households.

Two of the key challenges covered in Section 1 of this document are particularly pertinent to support services for homeless households. These are:

- The HRA, and
- Changes to the funding arrangements for supported housing

One of the key areas of focus in the HRA is the advice and assistance given to key vulnerable groups. The Act requires that the housing advice given is tailored to the needs of certain groups. Groups specifically mentioned are:

- Those leaving prison or youth detention;
- Care leavers;
- Those who were formally members of the armed forces;
- People leaving hospital;
- Victims of domestic abuse;
- Those suffering from mental illness.

An aim of the strategy is to review current practice and ensure that there is a clear, documented housing pathway for groups of people in Hillingdon who need specialist support, including each of these specified groups.

Mental health problems are particularly high amongst homeless people. Over a third, suffer from depression and there are higher than average instances of bipolar disorder, personality disorder, schizophrenia and post-traumatic stress disorder. Twelve percent per cent cite a dual diagnosis². Mental health problems are both a cause and a consequence of homelessness.

According to Crisis, 24 per cent of homeless people have been in care. Very few young people leave home at 18 and so continue to receive support from their parents. Children in care are no longer "looked after" by the council once they turn 18 and so can encounter a 'sudden cliff-edge' as the support safety net is withdrawn. There is a duty on children's services 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.

Particular areas that need to be addressed in developing the housing pathways in Hillingdon include:

- Accessing move on accommodation for a variety of vulnerable households
- Complex needs
- Needs falling short of thresholds for support

Many single homeless people are affected by one or more of poor mental health, substance addiction, or experience of abuse. Services tend to focus on a single need, such as mental health or drug use rather than on multiple needs and how those needs interact. For example there are difficulties in the mental health field about supporting people who are drinking or using drugs.

A further difficulty in accessing services is that their needs often fall short of the required threshold to qualify for specialist support. This can particularly affect those with multiple needs.

Funding arrangements for supported housing

The Government is consulting on future funding models for supported housing. It has been proposed that a top up pot be devolved to local authorities in recognition of the higher average costs involved in offering supported housing compared to general needs. Costs can be higher for a variety of reasons including higher maintenance, repairs and rates of turnover and the specific characteristics of residents, which may require the provision of communal areas and facilities as well as enhance security.

² Homeless Link, the unhealthy state of homelessness: Health audit results 2014

An additional proposal to limit benefit payable for core rent and service charges to LHA levels will no longer go ahead.

The consultation recognises that a different approach may be needed for short term accommodation, including hostels and refuges, but this type of accommodation will benefit from the same protection as supported housing in general. The Government also recognises that different funding models for short term accommodation types may also be applicable to Temporary Accommodation provided by local authorities in discharging their homelessness duties. Views are being sought on how best to provide support for short term stays alongside the monthly assessment and payment in Universal Credit.

Four task and finish groups will develop the new framework and a Green Paper is expected in autumn 2017. The new funding arrangements are to be introduced from 1st April 2019.

Supported housing is of far wider concern than homelessness strategy, but there is considerable overlap and inter-relationship. A key initial task will be to collate complete information on current supported housing and to unpick every supported housing rent and service charge, and to pull out the top-up element.

Emergency accommodation funding is particularly relevant for homelessness services. This will require a clear approach that is easy to access for service users and supports the organisations' cashflow.

The uncertainty over the funding of supported housing has to be seen as a key risk in responding to homelessness in Hillingdon. Providers have for some time been working on putting in place alternative funding arrangements to build resilience. For instance, a key partner for the Council, Trinity, is seeking to generate income through private market rental property management to cross subsidise their traditional services.

In the face of the proposed cuts to Housing Benefit for supported housing, there have been fears that supported housing services may be forced to close and that new facilities, would not be built. The uncertainty around funding has meant that there has been reluctance by providers to take on new supported housing developments. This still continues to be the case as a number of organisations are concerned over aspects of the funding plan, however there have been a number of bidders for funding for supported housing in the current affordable housing programme.

A further priority for the strategy will be to work with partners to understand the impact of the funding changes locally and to prepare for the new commissioning arrangements. For the homelessness strategy the key elements will be to ensure that those services provided for homelessness clients continue to be supported and that support which sustains tenancies is also maintained.

Review of semi-independent living services

In Hillingdon semi-independent living contracts help care leavers to make successful transitions into adult life. Services are commissioned to help them develop life skills

in a supportive environment that prepares them for independent living. At present the majority of support packages are delivered through block accommodation based schemes.

A number of these contracts are due to be re-commissioned. In practice, the level of support has not always been at the right level for presenting needs and some of the clients housed have not necessarily required the support offered. Schemes have been used for both social care and housing clients. A comprehensive review of the accommodation and support services and client needs from both a social care and housing perspective is currently underway.

The review, in addition to considering the need for semi-independent living services, will also need to consider:

- How appropriate, or otherwise, the existing accommodation is for housing clients compared to available alternatives.
- The possible impact of the HRA and whether this accommodation should form part of the response
- Whether an exit strategy for homeless clients currently housed is required
- In conjunction with the owners, appropriate alternative use / redevelopment of existing accommodation

Aligning commissioning priorities with the prevention and relief of homelessness

For supported housing to work effectively there need to be regular reviews of provision and identification of individuals and their support needs to be able to move-on to independent living. This needs to be aligned with an effective approach to securing an appropriate supply of accommodation.

The alignment of support commissioning priorities with the prevention and relief of homelessness will be reviewed, including the availability of short-term, flexible tenancy support. The service design will provide support for both people at risk of homelessness and people already homeless

Domestic Abuse

Domestic abuse can be highly traumatising and lead to victims developing mental health problems or developing problems with drugs or alcohol which may then make them vulnerable to homelessness. Victims, most often women, become homeless as a result of fleeing a violent relationship. There have been two Domestic Homicide Reviews in recent years. This strategy gives recognition to the need to implement the recommendations from these reviews.

Hillingdon's Domestic Violence Strategy is being updated and will include the detail of how Hillingdon is responding to the reviews.

Pan-London Housing Reciprocal Agreement

To improve housing pathways in London for survivors of domestic abuse and other forms of Violence Against Women and Girls (VAWG) a new Pan-London Housing

Reciprocal Agreement has been developed. The purpose of the agreement is to prevent homelessness in case of:

- Domestic abuse
- Other VAWG strands including sexual violence and exploitation (including prostitution and trafficking), so called 'honour' based violence, female genital mutilation (FGM) forced marriage and stalking
- Hate crimes
- Where people are at risk of harm from gangs or serious youth violence
- Other high risk safeguarding / community safety reasons

The agreement involves cooperation between local authorities and registered providers in London to move households where a move is needed and where suitable available accommodation can be identified. It aims to increase options for people with a social housing tenancy in London, who are at high risk of harm and need to move to a safe area of London.

Hillingdon Council has signed up to and will implement this agreement.

Integration across services

The supported housing consultation makes reference to considering supported housing in the round and to incentivising efficiencies across health, support and care.

Integration with employment services is a further significant priority. The links between employment and access to accommodation have increased relevance with the introduction and recent lowering of the benefit cap. The benefit cap can mean a gap between the rent payable and benefits paid which may lead to rent arrears and possible eviction and homelessness. Gaining employment means that the benefit cap no longer applies and is consequently an important aspect of tackling homelessness.

Government has confirmed that partnerships between jobcentres, local authorities and social landlords in the provision of support will be expanded as part of the new 'universal support delivered locally' USDL service. The aim is to encourage a system of locally designed joined-up and integrated services delivered at a local level.

5. Monitoring Delivery of the Strategy

Responsibility for monitoring delivery of the strategy sits with the Housing Board and it will be reviewed regularly as it is being implemented.

Mechanisms to engage with partner organisations will be strengthened so that a wide range of services and stakeholders are co-ordinated in their efforts to help tackle and prevent homelessness. A homelessness forum will be established involving key partners in Hillingdon.

A Homelessness Prevention Delivery Plan will be considered on a quarterly basis and this will be updated to take account of developments in policy, legislation, funding arrangements and local circumstances.

A comprehensive review of the homelessness strategy will be completed every five years, but may be more regular depending on circumstances affecting homelessness.

Monitoring arrangements will ensure that information relevant to the Councils duties under housing and homelessness, and equalities and human rights legislation is tracked and considered.

Supply and Demand Model

A supply and demand model tracks the number of households approaching the council as homeless and what action is taken. The model looks at how many instances there are when homelessness is prevented and how many go on to make a housing application. It tracks how many households are residing in temporary accommodation of various types, how many families move on from temporary accommodation and whether they move on to social housing or the private sector. The intention of the model is to understand the supply and demand situation to enable future planning. The existing supply and demand model will be further refined to better track supply and demand on a monthly basis and make projections for future requirements for accommodation and for payments to either retain or acquire accommodation.

The following principles underpin the model and projections:

- That homelessness is prevented where possible
- That where a homelessness duty has been accepted the preference is for a private rented sector solution
- A social sector letting may be available for households in temporary accommodation with a sufficiently high banding
- Other households would need to be placed in temporary accommodation
- If there is no longer term temporary accommodation available a placement is made in emergency accommodation
- Placements are made within borough where possible and in accordance with the Hillingdon Councils Temporary Accommodation and Private Rented Sector Offer Placement Policy

The demand for accommodation consists of both the flow of newly homeless households and those households that have been placed in temporary or emergency accommodation that still need to move on to a settled situation.

Based on current levels of activity there would be 2,425 households approaching the Council as homeless over the course of a year, of which 1,547 will be homeless, in priority need and eligible for rehousing. Where possible, homelessness will be prevented and although in some instances a client may be able to remain in their current home, in other instances the Council will assist them to find alternative accommodation. It is estimated funding for preventing homelessness is currently made available to secure 80 properties over the course of a year.

In addition to this there are 506 new additions to temporary / emergency accommodation over the course of a year and 312 that leave for reasons other than discharge of the homelessness duty, mostly as a result of a negative homeless decision. This leaves in the region of 194 households a year for that need to be accommodated. Where possible a settled property for discharge is found. For the others temporary or emergency accommodation will need to continue to be provided. A client may also, if they chose to, move to a shorter term private sector tenancy that would not qualify as a homelessness discharge.

The current rate of supply of properties for discharge is at present 98 social lettings a year to homeless households and 11 private sector discharges giving a total of 109 homelessness discharges. This leaves 85 households a year that are adding to the population in temporary / emergency accommodation.

At the same time, maintaining a supply of leased properties has become much more difficult and this has meant more households in bed and breakfast accommodation. The supply of leased properties has reduced dramatically over the last few years. Actions that the Council has taken to halt the decline, has meant that in the current year the supply of leased properties has increased slightly, but not sufficiently to meet demand.

If the supply and demand situation is rolled forward as at present, without additional demand or further loss of supply, it can be expected that in the region of an additional 7 households per month will be added to the number of households in B&B and an additional 85 over the course of a year. It is however the continuing supply and demand pressures could easily result in a worsening more households being placed in bed and breakfast.

Financial forecasts for 2017/18 are based on an additional 9 households per month in bed and breakfast. This translates to an additional 108 units of accommodation per annum over and above current turnover in supply to hold a steady state position.

However, for a more sustainable situation, there needs to be in the near future a drastic reduction in bed and breakfast use, and over the longer term a movement from temporary accommodation to settled housing solutions in the private rented sector.

The new Council owned hostel will assist in reducing bed and breakfast use. There is also a need to put in place new arrangements for leased accommodation in the short to medium term, while longer term options are appraised and developed.

Appendix 1

The legal framework for homelessness

Statutory Homelessness - the main homelessness duty

Part 7 of the Housing Act 1996, as amended by the Homelessness Act 2002 and the Localism Act 2011, provides the principle statutory framework for homelessness legislation in England. Broadly, a person is 'homeless' if they are not legally entitled to occupy accommodation that is accessible, physically available to them (and their household), and is reasonably fit to live in. Individuals are 'threatened with homelessness' if they are likely to become homeless within 28 days. The Homelessness Prevention Act extends this to 56 days.

Homelessness legislation distinguishes between those defined as in priority need, who are owed the main homelessness duty (predominantly families with children); and those who are not (predominantly single people, and including couples without dependent children).

The Council has discretion to determine whether a single person household is considered sufficiently vulnerable (based on a set of criteria) to be in priority need. It must consider how vulnerable the homeless person is compared to the ordinary person facing homelessness, not someone who is already homeless.

The 'main homelessness duty' to secure suitable settled accommodation (with suitable interim accommodation if necessary) is owed to homeless people that are eligible, 'not intentionally' homeless and fall within a priority need group. Eligibility is essentially concerned with immigration status.

Where the Council accepts the main homelessness duty, it must secure that suitable settled accommodation becomes available to the household, providing them with suitable accommodation in the interim.

Where an applicant falls within a priority need group but is 'intentionally' homeless, the local authority must ensure accommodation is available to the applicant for a period to give the applicant a reasonable opportunity to find suitable accommodation. Duties are also owed to those that are 'threatened with homelessness' and in a priority need group but the extent of the duty depends on intentionality.

For all other applicants, including non priority homeless applicants, the Council only has a duty to provide advice and assistance.

When someone approaches the Council for assistance due to homelessness the authority is obliged to carry out inquiries in order to ascertain what level of duty is owed to the applicant.

If there is reason to believe that a homeless applicant has nowhere to stay and is in priority need, there is an immediate duty to make suitable temporary accommodation available pending further inquiries.

The priority need categories are:

- a pregnant woman or a person with whom she resides or might reasonably be expected to reside;
- a person with whom dependent children reside or might reasonably be expected to reside;
- a person who is vulnerable as a result of old age, mental illness or handicap or physical disability or other special reason, or with whom such a person resides or might reasonably be expected to reside;
- a person aged 16 or 17 who is not a 'relevant child' or a child in need to whom a local authority owes a duty under section 20 of the Children Act 1989 ;
- a person under 21 who was (but is no longer) looked after, accommodated or fostered between the ages of 16 and 18 (except a person who is a 'relevant student');
- a person aged 21 or more who is vulnerable as a result of having been looked after, accommodated or fostered (except a person who is a 'relevant student');
- a person who is vulnerable as a result of having been a member of Her Majesty's regular naval, military or air forces
- a person who is vulnerable as a result of:
 - having served a custodial sentence,
 - having been committed for contempt of court or any other kindred offence, or
 - having been remanded in custody;
- a person who is vulnerable as a result of ceasing to occupy accommodation because of violence from another person or threats of violence from another person which are likely to be carried out;
- a person who is vulnerable for any other special reason, or with whom such a person resides or might reasonably be expected to reside;
- a person who is homeless, or threatened with homelessness, as a result of an emergency such as flood, fire or other disaster.

Appendix 2

Context and Challenges

The HRA is likely to have a significant impact on homelessness prevention services. The measures contained in the Act are set out below along with other current issues that are most likely to significantly impact on the provision of homelessness services. These include the lowering of the benefit cap and other welfare reforms; changes affecting private sector landlords and their agents; and changes to the funding models for temporary accommodation and for supported housing.

The Homelessness Reduction Act

This Act was brought forward as a Private Members Bill and drew on changes proposed following an independent review of the statutory homelessness framework, with a particular focus on how single homeless people are supported under it. The focus is on a preventative approach to homelessness, where all people, regardless of whether they are in 'priority need' receive help and assistance to stay in their home or find a new home. Those in priority need retain a right to be rehoused if they lose their home. The Act provides support for more people, for longer and has significant cost implications for local authorities. Government has confirmed that 'new burdens' funding of £61m over 2 years will be available, but it is not yet known how this will be distributed. The costs of implementing the legislation are likely to exceed this and to be ongoing.

Key measures in the Act

- Previously legislation³ defined that a person was threatened with homelessness if it was likely that they would become homeless within 28 days. Under the Act, the number of days has been extended from 28 to 56.
- There was an existing duty to provide advice and information about homelessness. The Act specifies that advice must be provided regarding:
 - Preventing homelessness;
 - Securing accommodation if homeless;
 - The rights of those who are homeless or threatened with homelessness, and
 - Help that is available and how to access that help.

Councils will be required to ensure that services are designed to meet the needs of particular groups at increased risk of becoming homeless including (but not limited to): care leavers, people leaving prison, people who have left the regular armed forces, victims of domestic abuse, people leaving hospital, people suffering from a mental illness or impairment, and people receiving treatment for a mental health issue.

³ Part VII of the Housing Act 1996, as amended by the Homelessness Act 2002

- The Act introduces a new duty on local housing authorities to assess all eligible applicants' threatened with homelessness and to agree a plan. Meaningful assistance must be provided to everyone who is threatened with homelessness, irrespective of their priority need status. If the Council has complied with the duty, it can be ended after 56 days whether the applicant is still threatened with homelessness or not.
- If a person is already homeless or if homelessness prevention work has not been successful, they will be owed a new relief duty requiring local authorities to help secure accommodation for any eligible person who is homeless. The duty will last for up to 56 days and will be available to all those who are eligible. They will receive help and assistance for 56 days and those who have a priority need will also be provided with interim accommodation.
- There is to be a new duty on public services to notify a local authority if they come into contact with someone they think may be homeless or at risk of becoming homeless.

Homelessness records

The government does not consider that the current statistics collected in relation to statutory homelessness, prevention and relief, and rough sleepers provide enough reliable information to provide an adequate understanding of homelessness. The statistics are currently under review, and it is likely that local authorities will be asked to provide additional data. New data requirements are being considered alongside the detail of the HRA. It is likely that CHAIN data will be extended beyond London and the Department for Communities and Local Government have stated that 'the scale of hidden homelessness must also be appreciated; people who are homeless but have not approached local authorities for help and those who do seek help but are turned away before a formal application is made.' It may be that case by case data will need to be made available rather than the current aggregated figures. The Council will need to review existing systems for collecting, storing and reporting on data to ensure an ability to respond to likely new data requests.

Changing nature of those affected by homelessness

The causes of homelessness can be roughly divided into two groups; structural and personal. Examples of personal reasons include relationship breakdown, addiction and mental health issues, and issues affecting those leaving care and leaving the prison system. Examples of structural reasons are an inability to afford a property to live in due to the cost of housing, the level and reliability of income, and the level of benefits in relation to rental costs. In Hillingdon as elsewhere, the ending of a private rented sector tenancy is now by far the most common reason for a homelessness approach. This has not always been the case. Ten years ago the Council was citing eviction by parents, families and friends as consistently the most frequent reason for homelessness in the borough. This shift in the pattern of homelessness mirrors that found elsewhere, especially in the capital and this has been linked by homelessness

commentators to an increasing proportion of homeless clients who are employed, possibly part-time and low waged, and have lost a private sector tenancy as a result of increasing rents.

The vast majority of homeless applicants in Hillingdon are reliant on benefits to some extent, however the proportion of formal homeless applicants with an income combined of both salary and benefits has increased from 27.3% in 2014/15 to 30.6% in 2016/17.

Local Housing Allowance and disparity with private sector rents

Local Housing Allowance (LHA) is a flat level of housing benefit payable to tenants in the private rented sector. LHA rates are based on the 30th percentile of market rents within a Broad Rental Market Area (BRMA) for different bed sizes and it is also subject to national caps. In the Summer Budget 2015 the Government announced that working-age benefits include the LHA, would be frozen for four years.

There is an increasing disparity between the LHA and the actual rents charged by landlords and this is a very significant barrier in accessing the private rented sector. There are two BRMAs covering Hillingdon and stretching into surrounding boroughs; the Outer West London BRMA and the North West London BRMA. The former covers the more affordable parts of the borough. The current LHA rates compared to rates in the borough and the gap between them is shown in table 3.2 in the section on housing supply.

Welfare Reform

There are a number of changes under the broad heading of welfare reform that may impact on homelessness and need to be taken account of in services to prevent homelessness.

Lowering of the Household Benefit Cap

The original Household Benefit Cap was fully rolled out by September 2013, and applied a cap to total household benefits at £500 per week for couples or single people with dependent children (£26,000 per year) and £350 per week (£18,200 per year) for a single person with no children. Households with income from benefits in excess of these caps experience a reduction in their housing benefit entitlement or their housing element within universal credit. Households can exclude themselves from the benefit cap by finding employment and various other exemptions apply.

The benefit cap was designed to get people back into work or to move to a more affordable home. It makes sure that those people who are out of work are faced with the same choices as those who are in work. Hillingdon has a strong employment market and there is clear evidence that the government's aims for the benefit cap have been successful in Hillingdon through a marked reduction in the number of households capped. In early 2014 numbers were around the 300 level. At the beginning of November 2016 there were 181 capped households in Hillingdon.

The Welfare Reform and Work Act 2015 set the benefit cap at a lower level and introduced regional variations. It also introduces two important new exemptions from the lowered benefit cap for carers and guardians. The new cap thresholds are:

- £442.31 per week (£23,000 per year) for a couple or single person with children living in Greater London;
- £296.35 per week (£15,410 per year) for a single person living in Greater London;
- £384.62 per week (£20,000 per year) for a couple or single person with children living in any other part of the country; or
- £257.69 per week (£13,400 per year) for a single person living in any other part of the country.

The lowered cap has been applied from November 2016 for households that were already capped. For these households, their existing shortfall between rent and the cap was increased by £3,000 per year (£57.69 per week) for couples and single people with dependent children, and by £2,790 per year (£53.55 per week) for single people. From December 2016 the cap was extended to households that were newly capped as a result of the cap reduction. At the beginning of January 2017, there were a total of 368 capped households.

There is a risk of increased homelessness due to evictions of households unable to meet rental costs following the application of the lowered cap. A high proportion of capped households are in the private rented sector and a further erosion of the availability of private rented accommodation for households without employment is likely. There is also a risk of increased evictions in the housing association sector.

The key to reducing the impact of the benefit cap remains getting people in to work. The impact of the benefit cap disproportionately affects larger families, especially lone parents, although with the lowered cap an increasing number of smaller households are also affected. The amount of the shortfall for smaller households is generally less than for larger households.

The lowered cap has implications for management of capped households who rent from the council and for those in temporary accommodation. It also has implications for the procurement of temporary accommodation, properties for prevention and for discharge of the homelessness duty in the private rented sector. Already existing difficulties related to the gap between LHA payable and rent charged and the impact of the current cap, will be further exacerbated as the benefit cap impacts at a lower level.

Development programmes for affordable housing are already affected by reluctance amongst housing associations to provide larger properties.

Discretionary Housing Payments

Increased discretionary housing payments (DHP) have been made available by Government to assist with the impact of reforms. These payments are not however an entitlement and do not represent a sustainable source of funding for families affected.

According to a London Council briefing, in 2015/16, 41 per cent of DHP awards made in Greater London were linked to the benefit cap. The proportion of DHP awards in Hillingdon linked to the benefit cap is less than this, however other London boroughs with higher rent levels have far greater numbers of households affected by the benefit cap.

The use of DHP is continuously monitored and Hillingdon Council's policy for its use is periodically reviewed to respond to changing circumstances. While DHP can provide a temporary solution, this in general needs to be linked to measures that will enable sustainable housing.

Universal Credit

The roll out in Hillingdon has begun for the most straightforward cases and as experience has shown that increased rent arrears are likely, this is one of the factors that has the potential to result in increased homelessness.

The roll out of Universal Credit for all claimant types is scheduled to be complete by September 2018. Hillingdon is currently scheduled for transition to the full Universal Credit service in July 2018. After the roll out process has completed, DWP will then begin moving all remaining existing benefits claimants to the full Universal Credit service.

Entitlement for 18 to 21 year olds

Automatic entitlement to housing support for new claims in Universal Credit will be removed from 18-21 year olds who are out of work from April 2017, however the Department for Work and Pensions (DWP) has confirmed that vulnerable young people will be exempt from this change.

New Funding Models

There are forthcoming changes to the funding models for temporary accommodation and for supported housing, the latter alongside a related change to general needs social housing rents. These changes may impact on accessing appropriate supply and sustaining tenancies and avoiding homelessness. Both of these financing models involve shifts from open ended funding arrangements to specific funding pots and from central government responsibility to local government.

Temporary Accommodation Management Fee

The present model for funding temporary accommodation, other than non-self contained bed and breakfast is based on 90% of the Local Housing Allowance payment at the January 2011 rates, plus a per unit management fee, set in London at £40 per week. This fee will end on 31st March 2017, and will be replaced by new funding from the Department for Communities and Local Government (DCLG). The new arrangements are not intended to replicate the existing system, but to provide up front funding for local authorities to respond to homelessness pressures. Initial funding levels will provide an increase on current funding and an announcement on funding allocations for 2017/18 is expected in January 2017. The impact that this will have in relation to temporary accommodation supply is considered in the section on securing accommodation.

Funding for Supported Housing

Supported Housing services cater for a broad spectrum of vulnerable groups, such as elderly people, women fleeing domestic violence, homelessness people, those with disabilities, and more. Typically, such services charge much higher rents to cover the added costs of specialised support.

From 2019/20 a new funding model is to be introduced for Supported Housing. Under the new model, core rent and service charges will be funded through Universal Credit (or Housing Benefit for pensioners and where Universal Credit has yet to be fully rolled out). Funding will be devolved to local authorities in England to provide a 'top-up' where necessary to providers, reflecting the often higher costs of offering supported housing. Government recognised that a different approach may be needed for short term accommodation including hostels and refuges, but have confirmed that this type of accommodation will benefit from the same protection as supported housing in general. Government will work with the sector to develop further options for providers of short term accommodation.

Local authorities will have an enhanced role in commissioning supported housing in their area, which will allow them to take a more coherent approach to needs across housing, health and social care.

A consultation on funding arrangements has been completed and a Government response is expected shortly.

Appendix 3

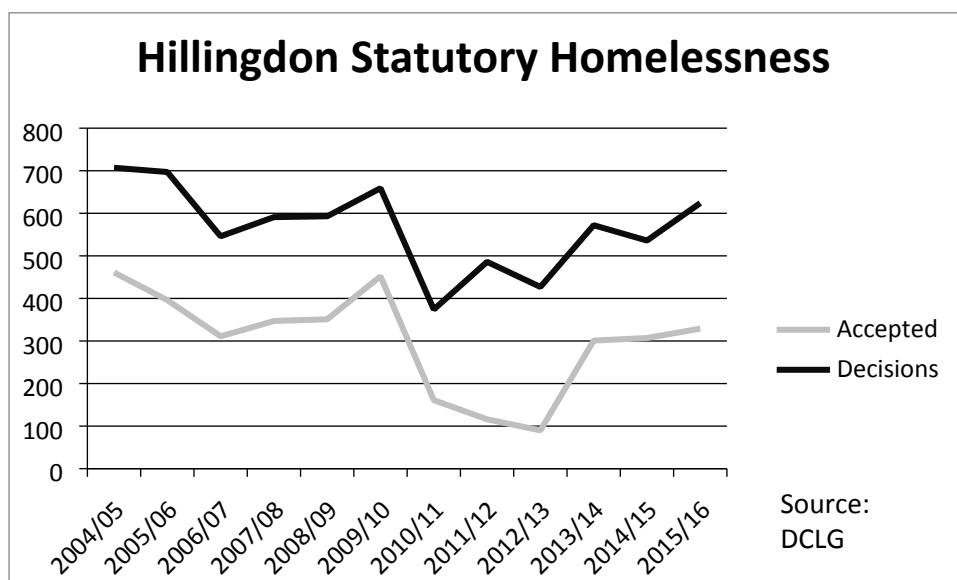
Homelessness in Hillingdon

Statutory homelessness in Hillingdon

The homelessness review has shown that there is not a clear pattern in Hillingdon in relation to these statistics, although in general the trend from 2010/11 to 2015/16 is upward. Figures dipped between 2013/14 and 2014/15, before rising again in 2015/16. The chart below shows that the numbers now are still lower than they were in 2004/05 but are currently higher than in 2010/11 and 2011/12.

Across England as a whole, homelessness applications increased from 112,340 in 2014/15 to 114,770 in 2015/16⁴; an increase of 2.2%. Homelessness acceptances increased from 54,430 to 57,740 (+6.1%) across England, from 17,530 to 19,170 (+9.4%) in London and from 311 to 331 (+6.4%) in Hillingdon.

Chart A2.1



Of the 667 homelessness decisions in Hillingdon between 1st April 2015 and 31st March 2016, 331 (50%) were accepted as being owed the main homelessness rehousing duty. This represents 3.04 of every thousand households that make up the estimated 108,000 households in Hillingdon. This is higher than the average rate across England of 2.5 per 1,000 households, but considerably lower than the average rate across London of 5.5 per 1,000 households⁵. Of those accepted as owed the main homelessness duty, by far the most common priority need category was that the household included dependent children. This was the case for 265 families and the household included a pregnant woman in a further 7 instances. Any other priority need categories accounted for less than 10 homelessness acceptances each in the year. They included applicants vulnerable due to old age, physical disability, mental health problems, release from prison, and domestic violence.

⁴ DCLG Live table 770

⁵ DCLG Live table 784

In the first 6 months of 2016/17, there have been 270 formal homelessness decisions, an average of 45 a month or 10 a week. Of these 158, approximately 26 per month or 5 to 6 per week were accepted as owed the main homelessness rehousing duty. This is lower than the average for the previous year of 55 formal decisions a month or 13 a week, and is a roughly equivalent rate of acceptances.

Analysis for the homelessness review shows that, as in other areas, the most common reason for homelessness in Hillingdon is the loss of a private rented sector tenancy which, along with rent arrears, accounted for over 70% of all homelessness acceptances in 2015/16. This mirrors experience in other areas, particularly other London Boroughs. The prevalence of this reason for homelessness has grown and is related to a buoyant private rented sector, for which there is considerable competition, along with issues related to some of the recent welfare reforms. Other reasons for homelessness included parents or friends no longer being willing or able to accommodate them (10%); prison release/remand (3%); violent relationship breakdown (3%); and leaving HM Forces (3%).

Most homelessness acceptances are in the 25 to 44 age bracket, which is consistent with the majority of them having a priority need due to pregnancy or children. Applicants come from a range of ethnic groups.

Statutory homeless statistics provide only a partial picture of homelessness. Hillingdon, like other councils, seeks to resolve threatened homelessness at a stage when it can still be prevented, before a homelessness application is taken. The statistics do not provide a reliable estimate of non-priority or 'hidden' homeless households.

Prevention and relief

Homelessness prevention involves the Council helping people to avoid homelessness through measures such as helping them to secure accommodation or to stay in their current home. Homeless relief is when the Council has been unable to prevent homelessness but has helped someone to secure accommodation, even though it was not under a legal obligation to do so.

In Hillingdon, data for the first six months of 2016/17 shows that there have been an average of 51 households a week that contacted the Council seeking advice regarding potential homelessness. On average, 23 a week were assessed as being homeless, in one of the priority need categories and eligible for assistance. An average of 21 households a week was dealt with through activity to prevent or relieve homelessness, including both priority and non priority households.

Prevention and relief activity sits outside the statutory framework. Those homeless households dealt with 'informally' through homelessness prevention are, as stated above, not included in the statutory homeless statistics relating to applications and acceptances, but separate statistics are provided on a quarterly basis for those households where homelessness has been prevented or relieved.

Non priority homeless households

For non priority need applicants that are not owed the main homelessness duty, such as individuals or couples without dependent children and who are not deemed vulnerable, the local authority has a duty to provide advice and assistance only. This duty applies in relation to any person who contacts the Council regarding homelessness.

There are around 30 approaches to the Council each week in relation to homelessness where the applicant does not meet the criteria to be considered as a potential statutory homeless case. Many of these will be non-priority homeless households including single people and couples. These households are entitled to advice and assistance only from the Council. The proposed HRA will require a strengthened response from local authorities in relation to this group of people.

Most non-priority households do not make a formal homelessness application and consequently the 'not in priority need' category recorded in formal homelessness decisions, form only a small proportion of non priority homeless households. Figures from the homelessness review show, for instance, that there were a total of 1,101 single people that approached the council as homeless during 2015/16, making up 44% of all such approaches.

Table A2.1: Statutory Homeless Decisions in Hillingdon

Decision	2015/16
Accepted as being homeless and in priority need	331
Eligible, homeless and in priority need, but intentionally	109
Eligible, homeless but not in priority need	55
Eligible but not homeless	130
Not eligible	42
Total Decisions	667

Rough Sleepers

Rough sleeping street counts and estimates are single night snapshots of the number of people sleeping rough in local authority areas. The autumn 2015 total of street counts and estimates across England was 3,569. This was a 30% increase on the previous year and 940 of this number were in London. Rough sleeping numbers in Hillingdon are higher than they would otherwise be, due to the presence of Heathrow Airport in the borough. The airport is a significant draw for rough sleepers and is the location where the majority of rough sleepers in Hillingdon can be found, many have no connection to Hillingdon. Without the airport the number of rough sleepers in Hillingdon is relatively small. The latest rough sleeper count, which took place on 24th November 2016 found 26 rough sleepers in the borough, of which 20 were at the airport. These figures are a reduction on the previous year.

Given that the majority of rough sleeping in the borough is generated due to the presence of the airport rather than any connection to Hillingdon Borough, this requires a distinct approach to tackling rough sleeping. While overall responsibility for homelessness rests with the Council, Heathrow Airport recognises that it has an

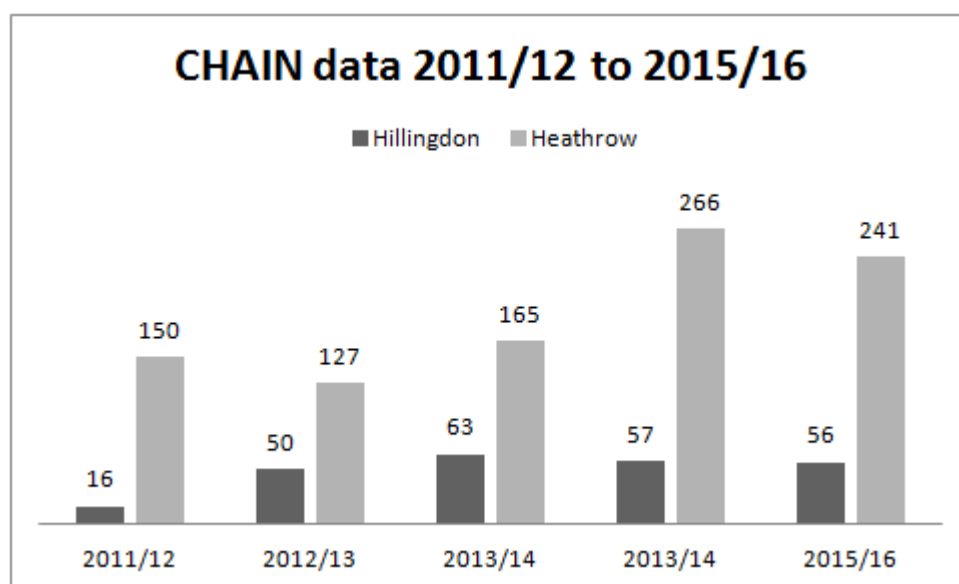
important role to play in assisting rough sleepers and re-directing them away from the Hillingdon Borough as appropriate.

In London, in addition to the annual rough sleeper counts or estimates, information on rough sleeping is available from the CHAIN (Combined Homelessness and Information Network) database which records information about rough sleepers. CHAIN is a continuing record of all contact by outreach teams and consequently provides substantially more information than the annual rough sleeper count regarding the rough sleeper population in London. The CHAIN report for 2015/16 shows 8,096 people seen sleeping rough in London. The data is broken down into three categories: flow (new rough sleepers); stock (roughs sleepers for a least two consecutive years); and returner (previous rough sleepers who have returned to the streets). For the purposes of recording on CHAIN, Heathrow is counted as a "borough" so that the particular issue of rough sleeping at the airport can be distinguished from rough sleeping in the wider borough of Hillingdon.

Table A2.2: CHAIN data on rough sleeping 2015/16

	London	Heathrow	Other Hillingdon
Flow	5,276	158	44
Stock	1,828	54	3
Returner	992	29	9
Total	8,096	241	56

Chart A2.2



Of the 56 rough sleepers in Hillingdon, 68% were seen bedded down on a single night only compared to 60% at the airport. The airport had 21 rough sleepers that had been seen bedded down on 5 or more occasions compared to 2 rough sleepers in the rest of Hillingdon borough. As shown in the chart below, rough sleeper numbers at the Heathrow have been high in the last two years. Figures in the rest of the borough have been at a relatively stable level over the last 4 years.

According to a recent report by St Mungo's, 4 in 10 people sleeping rough need mental health support and those with a mental health problem are more likely to live on the streets for longer.

Intentionally homeless households

In addition to households placed under homelessness legislation, there are also some households accommodated due to duties owed under the Children Act 1989. These are generally referred to as S17 placements and are most commonly made following a finding of intentional homelessness. The Council has a statutory duty under Section 17 to safeguard and promote the welfare of children in need.

Although families found to be intentionally homeless are not owed a main rehousing duty under homelessness legislation, if there are dependent children in the household, the Council still has a responsibility for ensuring the safety of the children.

During 2015/16, of the 667 formal homelessness decisions taken, 109 were found to be intentionally homeless. As at 30th September 2016, there were 14 families housed temporarily under S17 of the Children Act.

Hidden Homeless

It is difficult to get accurate information regarding the extent of homelessness because a lot of people will sofa-surf or stay with friends and family for as long as possible. The 'hidden homeless' have been described by the homelessness charity Crisis as "people who may be considered homeless but whose situation is not 'visible' either on the streets or in official statistics" and include those living in overcrowded housing, squatters, 'sofa surfers', long-term sharing and rough sleeping in hidden locations.

The Draft London Borough of Hillingdon Strategic Housing Market Assessment (SHMA) found that the number of concealed households in Hillingdon more than doubled between the census years 2001 and 2011 from 1,141 to 2,567. The majority of this increase (1,060) were aged under 55. Not all concealed households are living with another household unwillingly, however younger concealed families are more likely to have unmet housing needs due to affordability difficulties or other constraints, rather than having chosen to live as an extended family.

Accommodating homeless and potentially homeless households

There are considerable challenges in securing accommodation for homeless households. Where possible the council seeks to use the private sector for relief of homelessness or discharge of duty. In the current year to date, the council has discharged the homelessness duty in the private rented sector in 7 instances.

The homelessness review shows that during 2015/16, there were 211 social lettings that went to homeless households; 153 in council properties and 58 in housing association properties. During the first six months of 2016/17 there have been 224 social lettings of which 52 went to homeless households.

Difficulty in acquiring sufficient accommodation has meant that the number of households housed temporarily in bed and breakfast accommodation is increasingly pressured. At January 2017 there were a total of 635 households in temporary accommodation of which 246 were in emergency bed and breakfast placements. This compares to a total of 577 in temporary accommodation including 213 in bed and breakfast at the beginning of April 2016.

The Housing Act 1996 requires that where it is "reasonably practicable", local authorities should secure accommodation within their administrative boundary. However rising costs mean that authorities, particularly in London are increasingly looking to house homeless households in cheaper areas outside their administrative boundaries.