

Crisis response to the GLA's consultation on the rough sleeping commissioning framework 2016-2020

Does the Commissioning Framework address the right priorities?

Crisis supports the overarching priorities of the GLA's rough sleeping commissioning framework 2016 to 2020. We strongly welcome the commitment to minimise the flow of new rough sleepers and ensure that the more complex needs of entrenched rough sleepers are properly addressed. Over the last four years the pan London commissioning model has worked well to ensure that rough sleeping services are effectively coordinated across the London boroughs and that more specialist services are delivered. We welcome the GLA's continued commitment to this approach. With regards to the new strategy, we particularly welcome the commitments to expand the London Pathways model and the funding of Housing First and Pan London Personalisation for entrenched rough sleepers.

What additional priorities or changes to existing priorities do respondents suggest?

Crisis agrees with the GLA's commissioning priorities for 2016 to 2020. In addition, there should be an overarching priority to ensure that the outcomes of interventions are properly assessed and that funding is put in place to do so. The data currently collected focuses simply on outputs from services, rather than longer term impacts for service users, making it extremely difficult to properly assess the worth and compare different intervention models. More detailed recommendations on how this could be done are included throughout our response.

Crisis also recommends that the GLA should have a clear strategy on commissioning specialist services in the outer London boroughs. Historically rough sleepers in outer London boroughs have accessed services in inner London. Given the increase in the number of rough sleepers in the outer London boroughs however, the need for more specialist services to be delivered within the outer borough has become more pressing.

Below we have identified under the different priority headings, where further improvements could be made.

Priority 1: Ensuring that no one new to the streets sleeps rough for a second night and minimise the flow of new rough sleepers onto the streets.

No Second Night Out (NSNO) has been successful in supporting many new rough sleepers to move off the streets. It enables a rapid response and provides a safe space away from the streets while assessment takes place and accommodation or reconnection is arranged. Given the continued importance of this programme within the future commissioning framework there are areas however, that could be developed in order to improve the outcomes for rough sleepers. A recent Homeless Link report found that while NSNO services are particularly helpful for people who are new to the streets the service often doesn't help improve outcomes for more entrenched and returner rough sleepers.¹

Crisis also has concerns about the serious shortage of accommodation within London for people to move on to from the hub. This includes emergency out of hours temporary accommodation, short

¹ Homeless Link (2014), No Second Night Out across England, <http://www.homeless.org.uk/sites/default/files/site-attachments/20140211%20NSNO%20England%20Wide%20Report%20FINAL.pdf>

term accommodation and private rented sector accommodation. This can lead to hub clients being inappropriately housed. For example people with no support needs being housed in supported accommodation such as hostels, or spending longer periods of time in the hub. Another consequence of the lack of emergency temporary accommodation is that local authorities are frequently referring single homeless people to NSNO. These people are then re-referred to local authorities for emergency accommodation. This element should be reviewed to make the process of referral less protracted, more effective and ultimately less resource intensive.

There are also a number of more specific improvements that could be made to the reconnections element of the NSNO offer. Reconnection can be appropriate, and potentially beneficial, when rough sleepers have recently made an unplanned move or abandoned 'live' connections or support services. Caution is however necessary when considering whether it is appropriate to reconnect individuals with complex support needs and long histories of street homelessness. Particularly, given that they are unlikely to have existing (positive) support networks to link into and are likely to be resistant even if presented with a single service offer. Furthermore, reconnection should not be pursued with individuals for whom there are reasonable grounds to believe that they will be at risk of harm should they return. Even if there is no 'proof' in the form of police records, evidence via contact with other agencies in the recipient area should be considered substantial. Reconnection should generally only be pursued when rough sleepers have meaningful connections, in the form of prior service use and/or the presence of positive social support networks. Targeted individuals' views and preferences as to where they have connections should not be over-ridden by rigidly enforced local connection criterion. Further to this, rough sleepers' last place of settled residence should not automatically be given precedence over other legitimate forms of connection.

The process of rapid reconnection could be improved through greater investment. A larger reconnections team would allow NSNO teams to develop better links with local authorities across the country. Greater awareness of reconnection pathways in local authorities outside of London would allow for a more meaningful reconnections process.

Longer term outcomes of people picked up by NSNO are rarely recorded, making it difficult to measure the overall success and impact of the scheme. Broadway conducted a very basic internal evaluation of the original pilot and found that no outcomes were recorded for 75% of the people who had been reconnected. Crisis recommends that rough sleepers and named contacts in recipient agencies/authorities should be followed up after every reconnection as standard procedure and outcomes recording improved significantly. This would not only serve to protect against potential negative impacts but also improve the currently weak evidence base on reconnection outcomes. Suitable funding should be allocated to allow local authorities and NSNO to do this.

In terms of preventing the flow of new rough sleepers onto the streets, the GLA should, as part of their work through No First Night Out, continue to work more closely with local authorities to ensure that they play the principle role in preventing rough sleeping. Local authorities have a duty to provide people in priority need with settled accommodation. For those who do not qualify as priority need, the local authority still has a duty to provide meaningful support and assistance, which should prevent people having to sleep rough. Recent mystery shopping research carried out by Crisis into the experiences of single homeless people found that local authorities were frequently failing to provide single homeless people with meaningful advice and assistance and many were not given the opportunity to make a homeless application to see if they qualified for an offer of settled accommodation.² In 37 out of the 87 visits, local authorities made arrangements to accommodate mystery shoppers that evening, either through the provision of emergency accommodation or because they had negotiated for them to return to their previous address. In the remaining 50 visits,

² Crisis, (2014), Turned Away

most of which were at London boroughs, they received inadequate or insufficient help. It was common for mystery shoppers to simply be signposted to written information about renting privately or even turned away without any help or the opportunity to speak to a Housing Adviser. This was despite the fact that the mystery shoppers were playing a number of extremely vulnerable characters including someone fleeing domestic violence and someone with learning difficulties. In a significant number of visits (29) mystery shoppers did not receive an assessment and were not given the opportunity to make a homelessness application.

The mystery shopping research also found that people were often being refused any type of help until they supplied both proof of identification and/ or their homelessness. This happened across all local authorities, although it was a lot more common in London, where five out of seven boroughs visited consistently turned people away despite the fact that none of the characters played by the mystery shoppers had a place to stay that night. The burden on people to provide this type of evidence goes firmly against the prevention agenda that the GLA is trying to promote.

As it currently stands the homelessness legislation gives local authorities a significant amount of discretion when assessing whether someone is vulnerable enough to qualify as priority need. The Supreme Court handed judgment on 13th May 2015 in three joined appeals - *Hotak v London Borough of Southwark; Kanu v London Borough of Southwark; Johnson v Solihull Metropolitan Borough Council* [2015] UKSC 30 – ruled that the test of vulnerability should no longer be in comparison to someone who is already actually homeless, but to the ordinary person facing homelessness. This ruling means that a larger number of single homeless people will now be considered priority need and owed the main homelessness duty.

The GLA should work to ensure that London local authorities are giving single homeless people the opportunity to make a homeless application to ensure that anyone who is vulnerable is provided with settled accommodation. The GLA should also ensure that local authorities are providing meaningful advice and assistance to those who are not priority need to avoid people being turned away to sleep rough. In addition the GLA should ensure that appropriate funding is in place for advocacy services to help people access their entitlements from local authorities.

Priority 2: Ensure that no one lives on the streets of London

Crisis strongly supports the GLA's commitment to fund Housing First and Pan-London Personalisation projects for rough sleepers with complex and entrenched needs. We would also recommend that the GLA consider expanding the Housing First model among a wider group of rough sleepers.

For some specialised services, budgets could be pooled and services jointly commissioned on a regional or sub-regional basis. This is particularly important in large cities such as London where people frequently move between boroughs and can find it hard to access support. It also provides an efficient way for commissioners to invest in higher cost services for a relatively small number of clients without risking either duplication or gaps in provision. In addition, commissioning must be carried out based on specialist knowledge of the needs of the local population. The GLA should also consider adopting an individual budgets approach, enabling tailored and spot purchased packages. This approach has already proved successful in the DCLG pilots with rough sleepers in the City of London.

It should also be noted that successful work with clients with complex needs is heavily reliant on highly skilled staff and experienced services. Cuts to Supporting People programmes however, have resulted in cuts to wages and a reduction in staffing levels. Homeless Link have found that cuts to wages meant that good staff were leaving services and experience and judgement were being lost,

leading to poor quality and safeguarding issues.³ To meet their funding targets, providers are reducing staff salaries and terms and conditions, with some now offering low wages to support workers

Priority 3: Ensure that no-ones returns to the streets/ Priority 8: To help ensure that availability of appropriate accommodation, including emergency accommodation.

Single homeless people face great difficulties accessing accommodation in the private rented sector. Changes to benefits, including changes to uprating, caps to local housing allowance and the extension of the shared accommodation rate (SAR) for all single people under the age of 35 have significantly limited the number of homes that are affordable for our client group. The extension of the SAR has made it extremely difficult for under 35s to rent even a room in a cheap shared house. The government's intention is that a third of shared properties should be affordable within the SAR.⁴ Yet research conducted by Crisis found that just 13 per cent of advertised rooms are affordable within the rate.⁵ Even the Government's own figures show that the SAR falls short of local rents: a fifth of SARs fall 5 per cent or more below the 30th percentile of local rents.⁷

In addition to welfare reform, there are a number of other barriers that our clients face in accessing the private rented sector. Letting agents fees, tenancy deposits and holding deposits are hugely prohibitive factors in helping single homeless people into the private rented sector. A recent longitudinal study undertaken jointly by Shelter and Crisis into the experiences of homeless people moving into the private rented sector found that it was an expensive tenure, with many costs associated with moving into and maintaining a home.⁶ People were sometimes moved into tenancies without furniture or adequate household supplies, which they then had to take out loans to pay for. Poor conditions made homes cold and increased heating costs. People struggled with household costs such as energy and food. To manage them they went without food, lighting and heating on a regular basis. The majority of people had no savings and many got into debt when they were desperate or had a one-off cost such as replacing white goods. In addition to the problem of affordability, only 1 in 5 landlords are prepared to let to tenants on housing benefit, further limiting the supply of available accommodation to our clients.⁷

Given the huge number of barriers that homeless people face accessing the private rented sector, Crisis recommends that the GLA set up an online portal for landlords that would allow them to easily find information about access schemes in their area. At present there are a number of different organisations who operate PRS access schemes and social letting agencies across London, including Crisis. PRS access schemes help remove a number of barriers to the PRS, including assisting with the costs of tenancy deposits and fees. In addition, schemes work closely with landlords and tenants before and during the tenancy to ensure problems are quickly resolved and tenancies are sustained. The Private Rented Access Development Programme began in 2010 and was devised by Crisis, working with and funded by DCLG. Overall the schemes have enabled 153 local housing advice projects help 8,123 single homeless people make a home in the private rented sector. To date 90 per cent managed their tenancies for at least six months. Simplifying the process of letting a property via an access scheme could lead to a greater number of landlords doing so. The portal could also be accessed by tenants to help them locate a scheme in their area. The portal could also be

³ Homeless Link, (2013), Who's Supporting People Now.

⁴ All Local Housing Allowance rates, including the Shared Accommodation Rate, were reduced from the 50th to the 30th percentile of local market rents in 2011

⁵ Crisis (2012), No room available: study of the availability of shared accommodation

⁶ Crisis and Shelter, (2014), A roof over my head. Sustain: A longitudinal study of housing outcomes and wellbeing in private rented accommodation.

⁷ NLA (2013) Landlords exit LHA market

accompanied by good practice guides to help organisations, including local authorities, set up schemes. Crisis would be very happy to help provide resources for this.

Crisis also recommends that the GLA expand the number of tenancies available through Clearing House to improve access to accommodation. We would also recommend that the GLA reconsider only letting this accommodation on lets of two years. Evidence shows that a two year tenancy does not provide people who have experienced homelessness with a sufficient level of stability to properly rebuild their lives.⁸

Crisis strongly supports the GLA's plan to focus not simply on tenancy sustainment, but also broader outcomes, including employment. At Crisis we have designed a Model of Change to show the key outcomes we think are necessary for an individual to achieve in order to transform their life and leave homelessness. The Model allows us to consider a series of outcomes that we think would need to be achieved for this transformation to take place and enables us to show our contribution to the achievement of these outcomes.

As well as having experienced homelessness, many people we work with are low skilled or have had poor experience of education, they are likely to have been long term unemployed, they may lack social networks and safety nets, they may participate in risky activity and behaviour, experience poor mental and physical health and be at risk of repeat homelessness. The model is constructed by taking the ultimate aim to transform individual lives and then going back a step to the long term outcomes that would substantiate the achievement of that aim. We then worked back from the long term outcomes, to intermediate outcomes and to more immediate outcomes; each linked as part of a flow upwards towards the ultimate goal.

We strongly recommend that the GLA undertake a full evaluation of the impact of the Clearing House to assess the impact of residents of this accommodation. In addition to tenancy sustainment, the evaluation should consider the impact of the location of Clearing Housing placements, as well as a range of outcomes, such as those included in the Model of Change.

Priority 4: Tackle rough sleeping by non-UK nationals & Priority 5: Improve partnership working around enforcement

Whilst reconnection can be the most suitable offer for non-UK nationals who are sleeping rough, the GLA should ensure that a range of options are available. We are concerned that the proposed commissioning framework places too greater emphasis on reconnection and enforcement as the only option, which can often deter people from accessing services.

Outreach workers, where possible, should always attempt to provide an alternative offer to reconnection. The majority of the non-UK nationals our Crisis Skylight centre in London work with have very few support needs. Often access to accommodation is the only barrier preventing them from gaining employment. We would therefore recommend that the GLA invest in projects to establish low cost housing for non UK nationals as an alternative to reconnection.

Our Crisis Skylight London centre has also found that for many non-UK nationals they have been deterred from working with outreach workers who can refer them into a hostel place because of the presence of enforcement teams. We would therefore recommend that other voluntary organisations, such as Crisis, should be able to make referrals to hostels such as Olallo House who offer short term accommodation and help for newly-arrived migrants.

⁸ Crisis and Shelter, (2014), A roof over my head. Sustain: A longitudinal study of housing outcomes and wellbeing in private rented accommodation.

For those who are reconnected, the GLA should work to ensure that this is done in the most appropriate way. As a minimum, anyone who is reconnected should be provided with a named contact of a support worker in the country they are returning too. The organisation should also work closely with homelessness services in the country that someone is returning to ensure that a robust support package is available to help them access accommodation and any other services required to meet their needs. Crisis also recommends that the GLA work much more closely with the countries that people are travelling from to help tackle the underlying drivers that result in people coming to London and finding themselves sleeping rough.

With regards to enforcement, Crisis is very concerned about local authorities' use of Public Spaces Protection Order (PSPO) to prohibit or regulate any activity in defined public spaces which they believe 'is likely to have detrimental effect on the quality of life of those in the locality'. Rough sleeping can be included in the list of offences and the London Borough of Hackney has already done so. Using PSPOs to ban rough sleeping risks driving the most vulnerable people further away from vital support services. Evidence suggests that increasingly severe penalties risk pushing people into more dangerous activities via geographical or activity displacement.⁹ This can lead to an increase in the number of people who are hidden homeless or mobile rough sleeping, defeating the objective of priority 7 of the commissioning framework. The GLA should urge London local authorities not to employ this policy. .

Priority 6: Meet the physical and mental health needs of rough sleepers

Crisis strongly welcomes the GLA's commitments to expand the London Pathways model and the funding of Housing First and Pan London Personalisation for entrenched rough sleepers. Homeless people are much more likely to have difficulties accessing health services. If you are homeless you are far less likely to be registered with a GP. Homeless Link's most recent health audit of homeless people found however, that despite the majority of people surveyed reporting that they were registered with a GP, many were not receiving help for their health problems.¹⁰ They found that 15 per cent of respondents with physical health problems were not receiving support, while 17.5 per cent of those with mental health issues and 16.5 per cent with alcohol issues would like support but are not receiving it. Additionally, 7 per cent of respondents had been refused access to a GP or dentist within the past 12 months. The same report found that 36 per cent of homeless patients had nowhere suitable to go when leaving hospital. A lack of suitable discharge protocols for homeless people has obvious health implications in terms of people's recovery, but also likely deters them from entering hospital in the first place.

Priority 7: Tackle hidden or mobile rough sleeping

Crisis supports the GLA's commitment to tackle hidden or mobile rough sleeping. We would however, urge the GLA to commit to reviewing the London Street Rescue to fully assess the outcomes for rough sleepers and the extent to which it is providing good value for money. We make this recommendation in light of the relatively small number of people assisted into accommodation between April 2011 and March 2015 via London Street Rescue (2700).

The GLA should also monitor the number of people who are hidden homeless and reluctant to engage because they have been reconnected between London local authorities or people who have failed to have their homelessness resolved following contact with their local authority.

Priority 9: Enhance the service offer from faith and community based organisation

⁹ Crisis (2003) Compassion not coercion: addressing the question of begging; Housing Justice (2008) Rough sleeping: compassion v coercion: Church, community and government responses.

¹⁰ Homeless Link (2014), Health Audit.

Crisis supports the role that faith and community based organisations play in assisting rough sleepers. Often these are the only organisations providing services to rough sleepers who have no recourse to public funds. We welcome more detail on the proposed standard for day centres and the way in which non-commissioned services will be required to encourage people to engage in services before we are able to comment on this proposal further.

Priority 10: Maintain and improve the collection of data about rough sleeping

Data from CHAIN should continue to be reported on a quarterly and annual basis. Any further change to the way in which data from CHAIN is reported should be consulted on to ensure that decisions made about the way in which the data is presented is more transparent. The GLA should also ensure that the data from across the London boroughs can be easily compared. This could be achieved by producing a report comparing all data from across the London boroughs, in addition to the separate borough reports on a quarterly basis. The GLA should also promote the roll out of CHAIN data collection across the country. Not only would this improve the knowledge of local authorities outside of London, helping them to better commission services, it would allow London authorities to better track the outcomes of rough sleepers who are reconnected outside of London.

About Crisis

Crisis is the national charity for single homeless people. We are dedicated to ending homelessness by delivering life-changing services and campaigning for change.

Our innovative education, employment, housing and well-being services address individual needs and help homeless people to transform their lives. We measure our success and can demonstrate tangible results and value for money. We are determined campaigners, working to prevent people from becoming homeless and advocating solutions informed by research and our direct experience.

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