



Rough Sleeping 10 Years On: From the Streets to Independent Living and Opportunity

Crisis' response to the discussion paper from the Communities and Local Government Department

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Background & Introduction

Crisis is the national charity for single homeless people formed in 1967. We have been campaigning and delivering services for rough sleepers, former rough sleepers and other single homeless people across the UK for 40 years.

For more information please see www.crisis.org.uk

We warmly welcome this discussion paper, indeed with others we had been calling for the Government to lead a new effort to tackle rough sleeping 10 years on from the original target being set to “reduce rough sleeping to as close to zero as possible”. We launched a campaign calling for this earlier this year entitled *Time to put Rough Sleeping to bed for good* <http://www.crisis.org.uk/page.builder/roughsleeping.html>.

To inform our response to the consultation, we held a series of consultation meetings with some 30 users of our Crisis Skylight learning and activity centres in London and Newcastle, including a women’s only group and a significant number of migrants from the A8 countries. This response is also informed by Crisis’ extensive research and by our experiences from running services.

We have already sent to CLG the briefing document <http://www.crisis.org.uk/page.builder/recommendations.html> we produced for our campaign in advance of CLG issuing this discussion paper. In that paper we called for a new approach covering the following 4 elements:

Responsibility

The Government must take responsibility for recognising and solving the problem of rough sleeping by getting an accurate picture of those who are sleeping rough and setting realistic intermediate targets for further reductions in rough sleeping to deliver the goal of getting it to as close to zero as possible.

Prevention

The Government should focus on preventing people, even if they get into trouble, from becoming homeless and certainly from sleeping rough, by creating an effective safety net for all who are without, or at risk of losing, accommodation, including a review of local authorities’ responsibilities and duties to provide temporary accommodation.

Engage and support

The Government needs to fund services which engage with and support people who are currently sleeping rough, in particular those services which improve skills and tackle health and dependency issues.

Independent living

The Government must help people rebuild their lives, move into independent living and break out of homelessness for good by providing more move-on accommodation, reforming the system of Housing Benefit and supporting people into employment.

We reiterate the points made in that campaign document and welcome the fact that many of these themes have been picked-up and addressed in the discussion paper. In response to the questions posed by CLG in the discussion paper Crisis makes the following comments.

Responses to relevant questions

1. Have we identified the right issues for the updated strategy to address, and which are the most important?

We agree with the broad two-fold aims suggested for the updated strategy of:

- Driving rough sleeping down to as close to zero as possible, through renewed effort to bring and keep rough sleepers in, and preventing rough sleeping among those most at risk; and
- Improving opportunities and outcomes for former rough sleepers, to move people permanently from the streets, with a particular focus on employment, skills and health.

Crisis believes in setting the context for this updated strategy 2 issues should, however, be borne in mind:

- ***Rough sleeping should not and cannot be tackled in isolation from addressing the wider issues of single homelessness and chronic social exclusion.*** A significant proportion of those using “single homeless” services do not have a history of visible rough sleeping. Movement between visible rough sleeping and other forms of homelessness and bad housing is also a feature of life for many socially excluded adults. Crisis has long been campaigning on the issue of hidden homelessness and it is important that wider single homelessness does not fall through the gaps between strategies to address statutory homelessness and help families in temporary accommodation, and those to tackle rough sleeping. Central to this is looking at the role of local authorities in discharging their homelessness functions and duties and advice services. We also need to recognise that whilst some rough sleepers and single homeless people have high needs, not all do – some just have a housing need and the failure to address this can be what causes them then to fall into rough sleeping and a situation where other issues, such as mental health or alcohol abuse, develop. By not addressing the need for accommodation with possibly low level support, at an early stage we end up causing a situation that causes further problems for them as individuals and much higher cost for the state.
- ***The new strategy needs to be focused on transforming the lives of individuals affected by rough sleeping.*** Whilst great progress was made in the first 10 years, this was often by working to quite a standardised and linear process of outreach through to resettlement. A new effort cannot just be more of the same but will need to take account of new and emerging problems and be more responsive to the circumstances of individuals and particular groups. The strategy and all homelessness services must be person-centred and about empowering the individual and helping them get out of the crisis situation they have found themselves in and to rebuild their lives – not just about solving the “problem of rough sleeping”. This also requires looking at the dynamics within an individual’s life and over time. In particular we would encourage the Department to look at the research CESR¹ did with Crisis looking at homelessness journeys and how life events, service usage and housing circumstances interact and how that can result in both negative and positive circumstances. The involvement of all branches of Government is needed, particularly in addition to CLG, DWP, DIUS, DH, MoJ and the Social Exclusion Taskforce, and similar Departments at local level.

¹ Crisis & CESR, *Homeless Women: Homelessness Careers, Homelessness Landscapes* (2007). URL: http://www.crisis.org.uk/publications/Homeless_Women_Landscapes_Aug07.pdf

There are 2 issues that are not addressed in the discussion paper but which we believe need to be included in the proposed new strategy:

- **The local authority homelessness assessment role needs to be central to any strategy.** All local authorities are supposed to provide “meaningful advice and assistance” to those who approach them. It cannot be right firstly that the experience between local authorities can be so different and secondly that homeless people can approach a local authority and be turned away with no solution to their needs and not even the minimal duty of advice and assistance being fulfilled. We need therefore to look at each of: the rights an individual has to assistance; the duty an LA has to provide it; the application of those rights and duties – in particular the operation of eligibility, intentionality, an assessment of vulnerability and local connection in the homelessness application process; and the range of accommodation options a local authority should ensure is available.

Crisis’ research into homeless women, for example, showed how the homelessness assessment and application process is not ensuring that individuals in real need get the support they need, despite great vulnerability. The majority of women reported very negative experiences of approaching local authorities as homeless, with some being 'turned away at the door' or deterred by front-line staff from making an application. Over one third did not approach a local authority as homeless or could not remember doing so. Of those who did make an application less than one third were awarded priority need status and 28 per cent were found to be intentionally homeless, many others were not aware of the outcome of their application, and the “advice and assistance” provided was often deemed useless.

There is a difference between the experiences of those in a local authority with a good supply of social housing and where there is not, particularly in London. Those users of our Skylight centre in Newcastle generally had a more positive experience approaching their local authority and were more likely to be judged as eligible for housing. In London, however, the experience of all those consulted, and borne out by extensive research, was universally negative – all but one of them did not receive any advice or assistance whatsoever. The one positive experience was of an individual who had been turned away from his HPU and then came back, in his words, with a Doctor and a solicitor who proved he was in need and he was then accepted. It cannot be right that access to the accommodation and services an individual need is so determined by the geography of where they approach their local authority. We therefore need a new and realistic safety net for all who are homeless or at risk of losing their accommodation:

- We need a new right to shelter and to change the presumption from proving need before giving assistance to one that seeks to firstly provide accommodation to an individual who presents in housing need, and secondly to get someone who is sleeping on the streets off of them as quickly as possible;
- This needs to be underpinned by reviewing the responsibility of local authorities under the homelessness legislation to amending the way that priority need, vulnerability and intentionality are assessed to include having slept rough;
- There should be a new duty to provide temporary housing for all homeless people for 28 days, whether or not they are in “priority need”, as is the case in Scotland; and

- We also need to ensure that the local connection provisions are never used as a barrier to an individual accessing the services that are right for them and exploring the possibility of considering instead a “regional connection”, particularly in London.
- **Better recognising and responding to the needs of different groups of rough sleepers.** Every person who ends up homeless or as a rough sleeper is an individual and should be treated as such. In addition, however, it is important to recognise the needs of particular groups: especially women (see Crisis’ research), young people, BME groups and refugees, drug and alcohol users. We also need to recognise that whilst some rough sleepers have high and complex needs, other groups have low support needs.

For Crisis the most important issues for the updated strategy to address are as follows:

- The **high-profile central leadership and investment from Government** of the last 10 years needs to be renewed and committed to the goal of reducing rough sleeping to as close to zero as possible. The Government should follow the lead of the new Mayor of London and commit to delivering this by 2012.
- We need **new delivery mechanisms at regional and local level, particularly in London**, and effective cross-authority arrangements. This all needs to be underpinned by improved information, including better counts, with an end to rounding down figures of less than ten to zero and counts in neighbouring areas conducted on the same night, and wider surveying.
- **Recognise that prevention is better than cure** – too many new people are still sleeping rough and the causes are well known. We must once and for all take serious steps to ensure that the routes to rough sleeping are closed off in general, and that individuals in particular receive the support they need to prevent them falling into homelessness and having to sleep rough. This must include **reviewing individual’s rights to shelter and accommodation and local authorities duties and responsibilities** under the homelessness legislation and to provide housing options, as detailed above. This should include all local authorities having a private rented sector access scheme open to all, including non-statutory single homeless people, and access to high quality social housing. And we need real accommodation options for migrants with no recourse to public funds.
- Ensure that **speed is of the essence in getting people off the streets**. The presumption should be to get people off first and to inquire into their circumstances later. This needs to be underpinned by effective outreach and a clear open and transparent system for accessing emergency accommodation, with an increase in such accommodation as necessary.
- **Increase the supply of social rented housing**, for all on low incomes, to address the wider structural issues which impact on rough sleeping and to increase move-on. Despite the down-turn in the housing market and the availability of finance to support new build in all sectors, it is vital that the target to build 3 million new homes by 2020 is still delivered and a quarter to a third of this new housing should be social rented. This housing also needs to be available to those moving on from hostels with floating or on-site support as required to enable them to live independent lives.

- Recognising **the importance of addressing both structural and personal issues** to improve the outcomes and lives for current and former rough sleepers and sustain peoples' moves out of homelessness and towards independent living - preventing the churn back onto the streets. **Services need to be holistic and responsive** in meeting needs, this must include individual tailoring of healthcare (all forms), support and learning and skills provision. The role of high quality day centres also needs to be recognised and supported.
- **Giving all single homeless people the right and opportunity to take part in high quality learning and skills activities.** Improving opportunities for education, training and employment should be at the heart of all services. The Places of Change programme and the wider agenda it has stimulated has played a key role here that needs to be sustained and expanded but the agenda has to be taken seriously by DWP and DIUS with significant revenue resources available for high quality front-line work, and fundamental reform of housing benefit.
- All layers and parts of Government should recognise that tackling homelessness and rough sleeping is of benefit to many of its agendas. This requires **a concerted effort across Government centrally, regionally and locally** to deliver the joined-up solutions rough sleepers need and the joined-up benefits to Government itself. As the "sponsor" Department for the issue CLG must take a proactive lead on this, indeed without them it won't happen.

2. What new actions would have the biggest impact in delivering the proposed aims of the updated strategy?

To take each of the four proposed themes in turn:

(a) Further reducing numbers on the street

This issue is of vital importance, however, the updated strategy should be clearer than the discussion paper on highlighting the 2 separate issues of prevention – stopping the flow of new people coming onto the streets; and reducing the “stock” of existing rough sleepers and helping them off.

We must recognise that prevention is better than cure - the strategy must have a clear emphasis on preventing people finding themselves in a situation where they feel they have no alternative but to sleep rough. It is of very real concern that significant numbers of new people are still coming onto the streets every year – for example about half of those recorded on CHAIN each year are new contacts – and the main causes or trigger points are well known.

- We must once and for all take serious steps to ensure that the main routes to rough sleeping, from leaving prison, care, the armed forces and mental health services, are tackled, and that individuals in particular receive the support they need to prevent them falling into homelessness and having to sleep rough. There have been improvements in the services offered but we must do much more.
- In particular, both from research evidence and the views expressed in our consultation groups, it is clear that not enough is done to help those leaving prison to be suitably resettled and given help and guidance to be able to look after themselves, not return to their old ways and move instead towards maintaining their housing and employment. There are particular problems for the many offenders who receive very short sentences which are sufficient enough to disrupt their established pattern, particularly of housing and employment, but which are not long enough to bring them into contact with training and rehabilitation support in the prison. Support for prisoners needs also to be ongoing – some leaving prison may not seek it immediately but in a week or 2 and getting help then is fundamental to making a success of it.
- There needs to be a national action programme to reduce evictions, particularly from social housing or homelessness accommodation itself. Some tenants obviously will always get into difficulties but it cannot be right that in some areas around a third of tenants of homeless hostels end up being evicted, putting them back into a cycle of homelessness. It requires action on each of supporting tenant income maximisation; ensuring early intervention and floating support is available for those who need it; that local authorities monitor RSLs and hostel providers in their own areas; and, at national level, for it to be high priority for the Housing Corp (and HCA); further action to reform Housing Benefit - the source of so many arrears - and a new limitation on the ability of RSLs to evict using Ground 8.
- As said in section (1), to prevent rough sleeping and wider homelessness, the local authority role is vital and the strategy must therefore address the role of local authorities in discharging their homelessness duties. Authorities need to provide the correct advice and assistance when people first recognise they have a housing difficulty or go and seek help, and this needs to be meaningful and lead to a full range of housing options - including temporary accommodation and access to social housing for those for whom it is appropriate (irrespective of Priority Need distinctions) and having a

rent deposit scheme available to all. The local authority must also take a lead role in preventing repossessions, delivering an effective system of housing benefit, preventing evictions and ensuring comprehensive housing advice is provided to all who need it.

We welcome the recognition of **the problems of migrants sleeping rough**, particularly from Eastern Europe, and the Homeless Link action plan, the work of Barka and other agencies to tackle this. In addition to preventative action such as to reconnect people and working with community networks etc it is important to recognise that services are needed for those migrants with no recourse to public funds who do sleep rough.

- Of those migrants who were part of our consultation groups most had worked here and were determined to do so again - they had fallen into a situation of sleeping rough, on the buses or in squats when they could, due to employment ending. Their primary motivation was to get back into employment here in the UK and so a sole focus on helping them return to their country of origin will not necessarily help as they are clear that despite current circumstances they do not want to return. They therefore end-up stuck in the worst aspects of the no home, no job loop and, if not helped, will at best go into the black economy and stay very vulnerably housed, or at worst they will stay sleeping rough and develop health and other needs.
- We need to be considering options such as providing temporary shelter or accommodation in key areas, linked into employment advice, which migrants can use for a defined period as a basis to find employment, or then be supported home if they are not successful.
- In developing solutions we also need to listen and learn more from homeless migrants themselves as to why they come and what their needs are, and to tackle some of the wider aspects of housing which makes them vulnerable, such as overcrowding and poor conditions in the private rented sector.
- This updated strategy must also address those without recourse to public funds who have fallen out of the asylum system and are destitute. This group in particular is not going to return home and yet by a deliberate act of Government policy they are destitute, leaving the majority of them to end up sleeping rough where they do not even have access to financial support through benefits.

Regarding **outreach & working with those on the streets** for Crisis, the key issue here is speed. When someone is homeless and on the streets the priority must be to get them into some kind of suitable emergency accommodation, and then start doing assessments of needs, and looking into the details of the person's case.

- In our consultation groups real concern was raised that once on the streets you can become acclimatised very quickly firstly to circumstances of criminal activity, and secondly to what is necessary to survive and using services to do this – any delay to getting people off the streets makes this situation worse and the ability to adjust to a life back off the streets much harder.
- The system of verification needs to be looked at again. The consultation groups were generally positive about outreach teams but they were concerned that outreach teams don't always find them, not least because they move around.

- In particular outreach services need to be much more responsive to changing circumstances and different client groups. Our research into homeless women highlighted how only 12% of those women sleeping rough had come into contact with outreach teams – they consciously adopt a strategy of invisibility to be able to survive and outreach teams need to be much more responsive to this.
- It is important to recognise the role voluntary activity can play in first engaging with rough sleepers, whether newcomers or more entrenched. There are clearly strong views on both sides regarding soup runs and Crisis is part-funding new research into soup runs in Westminster to better understand who uses them and the role they do currently play. Where such activity, and others such as the provision of night shelters by churches, provides a low-threshold option for rough sleepers to come in but then links them with other services, then they can play a positive role as the start of a process of engagement for the individual. And whilst all services and staff should be of the highest possible standard there remains a real value in using and involving volunteers, with the right training and support, in all aspects of work with rough sleepers and homeless people.

The discussion paper talks about a new drive around those who are **the most entrenched or with higher support needs**

- We welcome the recognition of the need for genuinely innovative solutions designed around individual needs. As part of this we would support looking at new models and trialling an individual budget approach combined with empowered single lead professionals or “service navigators” who can plan and bring together a package of care and support.
- To be successful, however we need sufficient ongoing funding for programmes such as Supporting People and health and drugs budgets to provide the services necessary. The funding regime also needs to be much more flexible and responsive and take into consideration the varying levels of time and support needed for each individual – the standard 2-year SP timescale and contracting procedures can work against this.
- We welcome the need to pilot new models of provision for older drinkers, but there are a range of other groups which need similar specialist approaches, such as those engaged in all stages of substance misuse.
- We need to clarify what we mean by “entrenched” rough sleepers and to understand their circumstances better. We need to understand why people feel they cannot or are unwilling to engage with services and seek to respond to that better and spread best-practice as to what works. We must, however, ensure that firstly people are not labelled as “entrenched” with an expectation then that positive outcomes are not possible, secondly, that services are still made available to them, and thirdly that the focus is still on trying to find ways to engage with such individuals, not an enforcement approach which can only reinforce a sense of alienation.
- It is not just about specialist services, mainstream services, particularly health services, must be much more responsive to the needs of homeless people.

Helping more people **move-on from hostels into settled housing** is undoubtedly one of the most pressing issues that this updated strategy must address.

- The overall lack of move-on is well known but it is important also to realise the impact on individuals of being stuck in hostels when they are ready to move-on – they become institutionalised and the progress that they have made can be set back.
- For those who have low-support needs, the Private Rented Sector can be a great opportunity. A suitable PRS access scheme and/or appropriate floating support is required to make such an arrangement successful for both tenant and landlord and overcome potential issues, such as a reluctance to let to HB claimants. Every local authority should have a PRS access scheme open to non-statutory homeless people both to facilitate move-on and as a first choice housing option for those for whom it is appropriate, and as Crisis research demonstrates there is a strong business case for them doing so. It is important to recognise, however, that the PRS is not an unlimited resource and use of it needs to be planned and commissioned coherently and appropriately. Very real reform of HB is also needed.
- As Geoffrey Randall's research for CLG last year showed, however, half of current hostel residents have medium/high support needs and greater provision of medium and high support move-on with appropriate services must be developed. Such accommodation needs, however, to integrate with the local community so residents are not isolated or ghettoised and innovative approaches are needed - such as the Supportive Housing model from the US which Crisis has been seeking to adapt and pilot in the UK through its Urban Village development, bringing together formerly homeless and low income workers with on-site support.
- Move-on is undoubtedly increased by increasing the stock of social housing available, but such stock also needs to be available – through open, accessible and transparent housing allocations policies that ensure clients are allocated housing appropriate to their needs and circumstances – and affordable.
- We also need more emergency accommodation at the start. There should be a clear, robust and consistent system of referral to hostels that is focused on the welfare of the individual and easily understood and accessed by both clients and agencies working with them.
- It is important to recognise that hostels are not suitable for everyone - indeed the most common complaint that came up in all of user consultation groups was of hostels as institutional places, where residents felt they were not treated with sufficient respect as individuals, they felt unsafe and were concerned at the availability of drugs and alcohol. The investment through the Places of Change programme has radically improved the feel and services offered of many hostels and this investment needs to be rolled out to all and sustained to ensure all are brought up to the standard of the best. Wherever possible, however, homeless individuals for which hostels are not appropriate or who do not want to use them should be assisted into alternative accommodation options.

(b) A better future for former rough sleepers

Our aim as homelessness agencies should be to help those who we work with to live fulfilling lives, tackle the issues that contributed to their homelessness and help them move-away from homelessness and stop them cycling back. We need a better understanding of and realistic solutions to the multiplicity of needs facing those who find themselves homeless, ensuring that those who are in this situation and use services

are involved in shaping them. At their best, using homelessness services can be a spring board to help them turn their lives around for good.

Crisis strongly believes that improving opportunities for clients to engage in and progress through **education, training and wherever possible into employment** should be at the heart of all homelessness services.

- Crisis' research is clear: homeless people have overwhelmingly no or low qualifications; the majority of them would like to engage in learning activities but too few currently are and the earlier they are engaged the better; and they would like a wide range of activities and prefer those offered by voluntary agencies, but only a third of agencies offer them.
- All rough sleepers and homeless people should therefore have the right and opportunity to get involved in high quality learning and skills activities – participation in learning for homeless people must be widened and services provided to deliver this ambition.
- Engaging homeless people engage in learning should be at the heart of all homelessness services, whether accommodation-based or not, at all stages. Services need to include, or link to those agencies that can offer, the full range of meaningful activities to first engage with individuals, help them develop their self-esteem and then help them to develop specific skills they need for further training or employment.
- The majority of homeless people would like to work yet they face a range of personal and structural barriers. Engaging in learning and skills development provides the platform that can help people move towards work and build the self-belief and soft skills that are needed. Even if they do not make it into employment, however, engaging in learning has many wider benefits for the individual (and the state) – people use services better and more effectively; they are able to sustain their tenancies better; health improves and they are better able to form positive relationships.
- Services should be of a high quality and linked into opportunities for the individual to progress, with mainstream learning (i.e. FE) and employability services incentivised to reach out to voluntary agencies and the clients who use them. Services offered should include a full range of social and cultural pursuits, physical activity and those that promote personal development and wellbeing.
- The majority of activity, learning and training services provided by the voluntary sector are funded through an ad-hoc combination of creative use of statutory resources and fundraised income – there needs to be specific funding available and mainstream resources for Skills for Life and Informal Adult Learning must be made available to good voluntary agencies in the homelessness sector. The value of learning below level 2 must be recognised and funded and the Learning Power Award / Certificate in Development through Learning, specifically developed for the sector must be funded by the LSC and available in all areas.
- We need more secure places of activity that offer services to meet homeless people's needs and opportunities to build social skills and new friendships. We need funding to staff, develop and sustain projects that were developed as a result of the "Hostels Capital Improvement" / "Places of Change" programmes.

- The barriers to learning and employment, particularly the structure and delivery of Housing Benefit, must be reformed: the issues are long-known and have long-been talked about but the 16 hour rule must be abolished, the problems of tapers and particularly the interaction between high rents and HB substitution must be tackled so moving into work is financially advantageous, schemes such as the Working Futures model should be rolled-out to include single people and run-on and linking rules must be reformed.
- The discussion paper rightly acknowledges that the whole area of education, training and employment is central to giving rough sleepers and other homeless people a better future – CLG therefore at Ministerial and official level needs to have a real drive to co-ordinate activity across Government and compel action, particularly with DIUS and DWP.
- Many in the consultation groups talked about how they wanted to be able to help themselves through earning and of the value of initiatives such as the Big Issue in helping them do this.

We similarly welcome measures to **address mental health and substance misuse needs**. This should include:

- Further provision of specialist hostels, rather than those offering generic support, to cater properly for the full range of needs, and particularly those who have a dual diagnosis.
- Accommodation needs to be available for people at all stages of substance misuse: active users; those undergoing rehab and those coming out of rehab.
- A key issue raised in the consultation groups was the high availability of drugs in hostels and the need wherever possible to separate within or between buildings those with current substance misuse problems from those with no history of or having come out of misusing substances.
- Looking at mental health issues not just from a medical perspective. There needs to be much greater availability of CBT and other talking therapies.

The discussion paper does not mention **improving the physical health of rough sleepers**, yet despite improvements in both the NHS and specialist services, the prevalence of health conditions amongst the client group remains very high and access to services, including GP services, remains poor. Similarly despite new guidelines, there are too many cases of homeless people, particularly vulnerable ones, being discharged inappropriately to either no care or inadequate care. The updated strategy must include a section on improving physical health and address issues of need, provision of specialist services and access to mainstream health services.

Other issues that should be addressed in securing a better future for former rough sleepers include:

- **Good day centres** play a vital role, both as an initial and ongoing-source of support to those who are rough sleeping and homeless, but also for those who have been “resettled” but still need contact with help, support and advice.
- **Reducing repeat homelessness** needs to be a high priority and formerly homeless people need more readily available help to sustain tenancies over the long-term. To achieve this we need more funding for high-quality floating support services and more intensive support for those with high ongoing needs, including the development of move-on accommodation with onsite support. RSLs

and other landlords need to be proactive at identifying tenants in trouble and intervening to provide the support needed. This support, whilst focused on helping the individual to avoid getting into arrears and into difficulties with their tenancy, should also help the individual to move forward with their lives such as by connecting them to learning and development opportunities and helping them to interact with and play a role in their communities.

- **The role of family and social relationships** is too often overlooked. As Crisis' research with homeless women and other experience shows, "single homelessness" services work with many people who actually have relationships of various kinds and children at various stages. Helping clients to rebuild such relationships and start new ones through effective and relevant counselling and support, as St. Mungo's has been trialling with Relate, should be a higher priority. All homelessness services should have rebuilding self-esteem, respect, social capital and a sense of positive community at their heart.
- We should always be **looking to develop new and innovative approaches**, learning the best from services across the UK, the experience of those working with other socially excluded groups and where appropriate international experience, such as the Housing First model in the United States.
- We need to **recognise the needs of particular groups** of rough sleepers and homeless people, particularly women and young people, but also refugees and different BME groups. A real focus is needed also on helping those leaving the criminal justice system and ensuring they are helped into both settled accommodation, towards employment and to improve their lives.

(c) Delivery

Ensuring the right processes, structures and organisations are in place to commission, fund, deliver and sustain high quality services is obviously essential to achieve the aims of the strategy set out and central to this is resolving what is best done at each of national, regional and local level. Different strategies, services and funding streams need to be brought together more effectively at national, regional and local level.

Local authorities obviously need to take a lead on tackling issues in their own areas but it cannot just be left to individual local authorities. The requirement for clients to have a "local connection" and for agencies to give a priority to "local people" can mean that clients are not able to access the service most appropriate to their needs and can be a significant barrier to move-on. The commissioning of appropriate services also cannot just be done locally, not least because many services need a critical mass of users and so need to be commissioned on a cross-authority basis. These issues are most important in London where both the problems of homelessness and the lack of co-ordination with 33 separate boroughs and a range of other agencies, are greatest.

- Tackling rough-sleeping and wider single homelessness must be as important in updated local statutory homelessness strategies as tackling that of those entitled to assistance from the state - each strategy should set out how that local authority intends to reduce rough sleeping to zero in their area.
- The proposed new London delivery partnership needs to have real teeth. As the strategic-lead body for London with new powers over housing supply and capital funding, plus skills and public health,

and with the Mayor having committed to end rough sleeping by 2012, it would make sense for the GLA to have the lead role. The Mayor will also need to be able to direct individual boroughs to ensure their strategies are in accordance with his own strategy and target to end rough sleeping, particularly as Supporting People and homelessness prevention revenue funding will remain at local level.

- Outside London, suitable regional or sub-regional arrangements may also be needed, particular for the big urban conurbations to ensure there is effective cross-authority planning, commissioning and delivery of services.
- In all areas, where there are new or existing homelessness services that are of regional or national significance, they need to be designated as such with the appropriate revenue funding made available by local authorities, top-slicing their own allocations if necessary.
- In all areas, CLG will need to monitor robustly the extent to which local authorities do make tackling rough sleeping a priority. This is particularly important with the move to Local Area Agreements and the lifting of the ring-fence over SP resources to ensure that services for rough sleepers remain a priority.

Other delivery issues which need addressing include:

- On the way to meeting the goal of getting to as close to zero as possible by 2012, the updated strategy should include realistic intermediate targets for each year, including specific targets for London – we would suggest successive two-thirds reductions.
- At every level, as the discussion paper acknowledges, constant effort is needed to join-up services across sectors and administrative boundaries to meet the needs of this group. This needs to start with determined action by CLG at national level with other Government Departments and agencies.
- Developing and strengthening the staff workforce is very important. This includes appropriate recruitment, pay and training and this requires resources, which needs to be reflected in SP allocations.
- Commissioning of services needs to improve: funding should be long-term (3 years or more); the Compact needs to be implemented in full; tendering and monitoring processes need to be efficient and non-bureaucratic and commissioners should listen to agencies and homeless people themselves to understanding need and they should invest in and support successful services, not just the new and different.

(d) Better information

Information needs to be at the heart of the updated strategy to ensure delivery is always informed by changing and developing needs on the ground, that progress is monitored and best practice gathered and shared. The **procedures for street counts** have improved but as the discussion paper acknowledges, they

will never be sufficient on their own and particular groups, such as women, are not being adequately picked-up by them. To ensure we get as accurate a picture of those sleeping rough as possible Crisis calls for these main changes to the count methodology:

- Counts should be carried out on a co-ordinated basis across neighbouring local authority areas, in particular a pan-London, or at least sub-regional counts, should be held on the same night;
- The practice of rounding down one-night counts under ten to zero in the national estimate must end. The process for when an authority no longer needs to carry out a count, how they monitor this and when they should start counting again, also needs to be modified;
- All local authorities should carry out wider surveying work of single homelessness in their areas to map need and use that to commission the appropriate services to match. This should include looking at hostel and night shelter usage, those in squats, on friends floors and known to be living in hidden homeless or vulnerable housing circumstances; and
- The presentation of any figures should be improved, to include CHAIN data for London and other surveying, and to make clear how the figures are derived to stop current confusion in the media and elsewhere.

We welcome the recognition of the need to monitor **a broader range of outcomes for rough sleepers**, such as on training and health, not least to understand what works but would be concerned as to what this could mean in practice. Information gained through existing routes, such as SP returns, information provided on training and employment outcomes to relevant funders and systems developed within the sector itself such as the Outcomes Star and Link databases, should be used and analysed – it would be important not to set-up different or duplicatory systems. More can be done to look at information collected and held by other Departments, such as DWP and the NHS, on housing circumstances and outcomes to understand service usage better and ensure that they focus on rough sleepers as a client group and the housing and other issues they have as a need.

An issue raised by clients and in research has also been a **lack of appropriate information for people on finding themselves homeless** as to where to get help, services available and their rights and entitlements. We need much better information, advice and assistance available for people who find themselves homeless and in housing need. People should be able to find out easily what services are available so they can begin to find the route out of homelessness or the threat of homelessness. Every local authority should bring information together in a clear and easy to read format, such as the In Reach guide in London, includes getting the legal advice that they need.

3. As well as action by government, what can other partners in the statutory, voluntary and private sectors contribute to the updated strategy?

The voluntary homelessness sector has always provided the main support for rough sleepers and the sector individually and collectively needs to continue to build its expertise, knowledge, capacity and effectiveness. The homelessness sector should be a key beneficiary of Government funding and programmes to support the voluntary sector and build its capacity, whether delivering statutory contracts or stand-alone services. Different sectors, particularly those for ex-offenders, drugs, mental health, skills and employability - need to

work together and learn from each other to deliver the outcomes homeless people need. Big is not always best or beautiful and the work of small specialist or local agencies also needs to be supported.

The **role of Government** is obviously fundamental in setting policy and providing funding. This has to be led by CLG but much of what Crisis has proposed in this response requires strong and sustained cross-Department working.

- DH, HO, DIUS and DWP, and their key agencies (NHS, Prison Service, LSC and JCP) each need to be committed to the objectives in any revised strategy and for it to be reflected by making rough sleepers a priority in their own strategies, funding and commissioning. This could be facilitated by having these Departments joint signatories/sponsors to the strategy.
- The role of advice services is often overlooked and undervalued and the recent changes to the commissioning of advice services is of real concern and could lead to many very vulnerable people not getting the advice and advocacy they need – the Legal Services Commission therefore also needs to be involved.
- At local level the full range of services for vulnerable adults need to be available. Local authorities also need to join-up service across functional boundaries and monitoring and measurement of them should include looking at their responsiveness and performance in this. As LAAs go forward, CLG and Government Offices should ensure measures to tackle rough sleeping to be included either as headline indicators or part of delivering them and that they are suitable stretching.

Tackling rough-sleeping is of course far more than a housing issue but there are real links here which need to be stronger:

- **RSLs** and other housing associations need to do much more and be encouraged, monitored and required to do so by the Housing Corp/HCA. This should include: proactive preventative work with tenants to prevent arrears and tenancy failure; ensuring eviction is really the very last resort; having effective rent structures; supporting hostel move-on by making allocations available and helping tenants to receive support with non-housing issues and move towards employment.
- The new **HCA** needs to have delivering the new strategy and tackling wider homelessness as a key priority – not marginalised by the focus on delivering new housing units. We are concerned at the muted move of the Homelessness, Overcrowding and Worklessness Division from CLG to the HCA as we feel central government itself has to play the lead role. The innovation, enterprise and openness to new approaches shown through HCIP/PCP and other initiatives needs to be carried forward.
- The Affordable Housing development pot should include an allocation for new supported housing and for new high-support move-on.

Rough sleepers and homeless people themselves must be the focus of any updated strategy. Consulting and involving individuals and users of services needs to continue and be sustained, not least as we ultimately want to work with and for people not do things to them.

4. **Do you have sources of evidence or examples of good practice that it would be helpful for us to draw on?**

Crisis has over 40 years experience in both delivering services and in researching into the causes, consequences and best solutions to homelessness which we would be very welcome to share and discuss. In particular we would draw attention to:

- Crisis research is all freely available to download at www.crisis.org.uk/researchbank. For this strategy of particular relevance is our research on women's experiences of homelessness; on homeless people's attitudes to learning and the value of getting them engaged; and the case for investing in PRS access schemes;
- Our expertise and experience in delivering activity, learning, training and employability services, particularly through our Skylight learning and activity centres in London and Newcastle (and now with PCP funding Oxford and Birmingham) and Changing Lives (nationwide);
- Our expertise in using the PRS to house single homeless people through our nationwide network of SmartMove schemes; supporting clients to maintain tenancies through SmartSkills and advising schemes themselves through our national advisory role;
- Our experience in engaging with rough sleepers, providing often a first point of contact and all in-one services over the Christmas period and linking people onto longer term services, through our Crisis Christmas Centres.

For further information or to follow-up any aspect of this response, please contact:

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