

Tackling homelessness together – St Mungo's response



May 2019

About St Mungo's

St Mungo's vision is that everyone has a place to call home and can fulfil their hopes and ambitions. As a homelessness charity and housing association our clients are at the heart of what we do.

We provide a bed and support to more than 2,800 people a night who are either homeless or at risk, and work to prevent homelessness.

We support men and women through more than 300 projects including emergency, hostel and supportive housing projects, advice services and specialist physical health, mental health, skills and work services.

We work across London and the south of England, as well as managing major homelessness sector partnership projects such as StreetLink and the Combined Homelessness and Information Network (CHAIN).

We influence and campaign nationally to help people to rebuild their lives.

For any questions about this submission, please contact rory.weal@mungos.org.

Summary of response

We welcome the Government's commitments to addressing homelessness, and in particular to halve rough sleeping by 2022 and end it altogether by 2027. Local accountability and strategic oversight will be key to achieving these aims, as will a focus on getting all local agencies and partners to play their part in the solution.

Rough sleeping – the most dangerous form of homelessness – has risen by 165% since 2010¹. Last year almost 600 people died while sleeping rough or in emergency accommodation. Working together to tackle homelessness has to be a national priority².

St Mungo's welcomes the introduction of Homelessness Reduction Boards (HRBs) as a means to deliver long-term and strategic interventions, ensure a joined-up and evidence-based approach to service provision, and to hold all parts of the local system to account for their role in tackling homelessness.

¹ MHCLG (2019) *Rough sleeping in England: autumn 2018* <https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2018>

² Office of National Statistics (2018) *Deaths of homeless people in England and Wales: 2013 to 2017* <https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/deathsofhomelesspeopleinenglandandwales/2013to2017>

We believe HRBs can act as anchors in the local system, delivering place-based responses, underpinned by high quality data and regular monitoring. This will ensure money is spent in a targeted and effective way, with an emphasis on individual and service outcomes. This should give Government the confidence to increase the level of investment in local authorities, and allow HRBs to take decisions about how such funding should be spent to address local needs.

The need for long-term funding

New funding is required to fill the significant gap in local authorities' spending on homelessness. Research from St Mungo's and Homeless Link shows that local authority spending on services for single homeless people fell by 53% between 2008/09 to 2017/18³. This is the result of cuts to 'Supporting People' services, which focus on helping people to avoid and escape homelessness. In 2017/18 nearly £1 billion less was spent on Supporting People services compared to 2008/9⁴. At the same time rough sleeping has risen by 165% since 2010 and the number of bed spaces in homelessness accommodation projects has fallen by 30%.

Since the Government's target to end rough sleeping was announced, additional funding has been released to help local authorities deliver this objective.⁵ However, this new funding falls far short of the annual reduction in spending identified by our research.

The manner in which funding is distributed to local authorities is also causing on-going problems, and undermining efforts to develop long-term, joined-up and sustainable approaches geared towards ending rough sleeping for good. Local authorities are increasingly reliant on small pots of central government funding, which must be bid for. This funding is short term, and is in practice often being used to plug gaps in essential, on-going services such as outreach and emergency accommodation.

We believe the proposals in this consultation present an opportunity to move towards a sustainable, collaborative, and preventative approach to tackling homelessness. Homelessness Reduction Boards, existing on a statutory basis with local authority ownership, multi-agency buy-in, and rigorous accountability frameworks, can be the vehicles to deliver a long-term sustainable funding stream for homelessness services and preventative approaches, assured of effective oversight and local accountability.

³ WPI economics, for St Mungo's and HomelessLink (2019), *Local authority spending on homelessness Understanding recent trends and their impact* <https://www.mungos.org/app/uploads/2019/04/Local-authority-spending-on-homelessness.pdf>

⁴ The Local Government Association estimates the funding gap facing local homelessness services will be £400m per year by 2024/25, but the baseline for the analysis is 2017/18 and the funding gap only corresponds to keeping local authority services 'standing still'. It does not include any extra funding needed to improve services or to reverse any cuts made to date. Local Government Association (2018) *Local government funding: Moving the conversation on*

https://www.local.gov.uk/sites/default/files/documents/5.40_01_Finance%20publication_WEB_0.pdf

⁵ This includes £10m Rough Sleeping Grant, £20m Homelessness Prevention Trailblazers, £10m Social Impact Bonds, £75m Rough Sleeping Initiative Fund, £72.7m HRA new burdens funding. The Government's Rough Sleeping Strategy, published in August 2018 was also 'backed by an additional £100m' but it is not clear how much of this is accounted for by existing initiatives, nor how much will be delivered to local authorities.

St Mungo's recommends:

- **The Government should introduce Homelessness Reduction Boards on a statutory footing, with primary responsibility for place-based strategic responses to homelessness.** Objectives should include developing and overseeing the local homelessness and rough sleeping strategy, scrutinising implementation and outcomes through effective monitoring and data systems, and holding partner agencies to account.
- **The Government should urgently invest an extra £1 billion a year on tackling homelessness, with the confidence that these new accountability structures will ensure the money is spent in an effective and targeted way.** We recommend funding is restored to the levels invested in homelessness services before the financial crash, and is ring-fenced as part of the overall financial settlement for local authorities.
- **The Government should drive forward efforts to get local and national partners to step up and play their part in tackling homelessness.** This includes leading by example, embodying the principles in this consultation in national action, with a refresh of the 2018 Rough Sleeping Strategy delivered this summer. This should include meaningful cross-government co-ordination, with implementation plans from each department setting out how they will build on the initiatives currently underway and improve their systems collectively to tackle homelessness.

Non statutory structures

Question 1: What non-statutory structures are you aware of in your area that cover homelessness as part of their agenda?

Question 2: How effective are the non-statutory structures in your area in meeting their stated objectives?

Question 3: More generally, what are your views on whether these sorts of non-statutory structures can drive system change, support the reduction of homelessness in the local area and hold all local partners to account for delivering their commitments?

Types of non-statutory structure

In most areas where St Mungo's works, there are non-statutory structures of some description charged with supporting the development of approaches to tackle homelessness in the given area. For HRBs to be effective they should learn from these existing structures, both to spread best practice and ensure new structures complement effective existing arrangements. The most common examples can be broadly grouped under the following descriptions:

- **Local homelessness forums** are a common non-statutory structure with a homeless-specific focus. These groups usually meet on a regular basis and provide an opportunity for statutory agencies, non-statutory community groups and interested parties to provide updates on their work. They can be useful in identifying opportunities for improved practice as well as challenges to resolve. However they lack the formal buy-in, authority and leadership to deliver concrete actions or ensure accountability and oversight.

- **Homelessness boards or homelessness strategy groups** often exist to oversee the delivery of the local homelessness strategy. They are often responsible for the strategic vision for tackling homelessness, and can have the authority to hold service providers to account for their outcomes. However, they rarely have the authority to hold other parts of the system to account (e.g. health, police etc.) and are often perceived as 'ivory towers', being removed from non-statutory and community groups. There are issues with how accountable these boards are over overall levels for homelessness.
- **Case management groups** – these groups can be homeless-specific, have a wider complex needs brief, or address the needs of specific sub-groups (e.g. young people, migrants). They are useful in getting partner agencies together to address difficult cases where individuals may be in contact with multiple services at once. They can be highly effective at resolving individual needs, but are not sites for the development of strategic approaches across the whole system.

There are other examples of non-statutory forums in the health system which are worth consideration too. Sustainability and Transformation Partnerships (STPs), and Integrated Care Systems (ICSs), are leading the agenda around the integration of health and social care to co-ordinate services around the individual, particularly relevant to those with complex needs. Some STPs are already working to address homelessness in a joined-up way⁶, however these are the exceptions, and more needs to be done to encourage STPs to facilitate the join-up of housing and health.

Effectiveness of non-statutory structures

Each of these forums, groups or boards have different remits and functions. In many areas non-statutory structures addressing homelessness will look completely different. An understanding of the variability of these structures and the reasons for this should be considered fully before embarking on reform. Areas with the most effective approaches to tackling homelessness have multiple layers of accountability, each with clear remits and complementary workstreams. Case management groups and homelessness forums can provide vital insight to homelessness board/strategy groups – who should in turn make themselves accountable and hold others to account. Our services tell us that boards can play an important role in addressing systems issues or concerns that might not be possible with the traditional provider-to-commissioner relationship. Forums can be useful settings to mobilise the community, agencies and bodies to act. They are most effective when integrated into a wider structure responsible for developing homelessness and rough sleeping strategies, overseeing implementation of strategies, and ensuring accountability for outcomes.

While effective in certain specific areas, these structures often fail to have the authority to drive cultural change and hold local partner agencies to account. Without reform, it is

⁶ Cornwall and the Isles of Scilly Plan aims to prevent homelessness, to improve access to affordable, good-quality housing. In Manchester the newly established Greater Manchester Homes Partnership is offering rough sleepers accommodation with a wide range of support to help them access health, training and employment services and to sustain their tenancies.

doubtful whether these sorts of non-statutory structures can drive system change and support the reduction of homelessness. Some of the challenges include:

- **Lack of buy-in from senior leaders** – existing structures often lack the senior-level membership required to ensure accountability across the local system, with the power to drive forward change.
- **Remoteness from the frontline** – structures can exist in isolation from the experiences of people who are homeless and the services working with them. Case management groups can struggle to feed into higher level ‘strategic’ boards, with the perception that they are ‘ivory towers’ lacking in transparency or accountability.
- **A regionally varied picture** – while some areas can have highly effective structures, in many other areas they simply do not exist. Without a statutory duty to establish and attend such structures, homelessness can become deprioritised in the local area.
- **Heavily reliance on individual political leaders** – in St Mungo’s experience, the existence of many local structures is highly contingent on individual decision makers and political leaders. Changes to office holders can undermine existing efforts – which may be closely associated with a predecessor. This also has the effect of in-building insecurity and short-termism to these efforts.

Driving change in partnership – Oxford Homeless Movement

In Oxford, there have been recent measures to respond to a spike in the number of people sleeping rough through a concerted effort to join-up efforts across the city. As outlined in its Housing and Homelessness Strategy, the council convened a ‘City Conversation’ in November 2017 with stakeholders, voluntary and community sector and people with lived experience of homelessness. This has developed into the Oxford Homeless Movement which is turning talk into action – by developing a city charter as the basis for sustainable, long-term partnership to tackle homelessness in the city. This will support an agreed commitment across all stakeholders, including the Council, to tackle rough sleeping and its associated complexities.

The fact that the Movement brings together the public, private and charity sectors around solutions has improved relationships between these groups, and is creating constructive dialogue which is translating into action. However, there is still more work to do to ensure the local homelessness strategy maintains relevance in an environment of rapid change, and that initiatives are developed in a strategic way.

Case management in Hackney

Individual cases are most frequently and effectively addressed through other non-statutory structures. For example, in Hackney the High Risk Client Multi-disciplinary team meeting (MDT) was established to identify clients whose health is a serious concern, so as to improve quality of care and access to effective treatment. Co-ordinated by St Mungo’s, the forum meets every 4-6 weeks, and brings together the local surgery, hospice, drug and alcohol teams, community organisations and hostels.

The MDT is an example of effective local non-statutory partnership working, facilitating multi-agency working for clients with the most complex needs. However, it is distinct from the local homelessness forum – this is important as setting the strategic direction for service delivery is distinct from case management.

These are just some of the main local challenges with existing non-statutory structures. However, the main reason for the failure of current non-statutory structures to deliver reductions in homelessness is the highly challenging external environment, much of which is outside of the control of local authorities.

In particular, the reduction in funding faced by local authorities has dramatically reduced the capacity to develop sustainable joined-up initiatives. The process of bidding for short-term funding pots from central government has further undermined strategic multi-agency approaches to homelessness, with services developed with little consultation or reference to existing strategies.

St Mungo's recommends that the Government should introduce Homelessness Reduction Boards on a statutory footing, to formalise and share some of this existing good practice, and raise the bar in areas without such structures. If combined with long-term investment, this would ensure initiatives to prevent homelessness and end rough sleeping are developed with appropriate accountability and oversight.

Statutory structures and roles

Question 4: Which statutory structures and individuals with statutory roles in your local area currently have strategic and operational conversations about how individual services and interventions can help reduce homelessness?

Question 5: Which statutory structures and individuals with statutory roles in your local area do you think should be having strategic and operational conversations about how to reduce homelessness?

Question 6: Please describe how you think the statutory structures and individuals with statutory roles in your area should be discussing and contributing to plans and actions to reduce homelessness i.e. what should they be doing?

There are a variety of statutory structures and individuals with statutory roles who have strategic or operational conversations about homelessness. While many individuals will be involved in strategic and operational conversations, there is no statutory structure which brings this all together.

Most of these discussions will be operational, resolving individual cases – particularly through the duties established under the Homeless Reduction Act on public authorities. The likes of Safeguarding Adult Boards (SABs) and Multi Agency Risk Assessment Conferences (MARACs) will be having similar operational discussions too, in reference to specific cases.

The strategic role of statutory bodies and individuals with statutory roles is often the missing piece in the local system. This is where HRBs can step up and play a significant role.

Health and Wellbeing Boards

As with non-statutory structures, the effectiveness of Health and Wellbeing Boards at co-ordinating strategic approaches to homelessness will be largely dependent on the individual Board's decided focus and priorities. Some Boards have been directly involved in overseeing the development and implementation of local homelessness and rough sleeping strategies – Islington Council's Homelessness Reduction Strategy was overseen by the HWB, with annual updates taken to the Board. However this is rare, and it is more common for Boards

to take an ad hoc interest in homelessness through Joint Strategic Needs Assessments (JSNAs).

In 2015 as part of our Homeless Health Matters campaign, St Mungo's asked Health & Wellbeing Boards to sign our Charter for Homeless Health. 44 Health and Wellbeing Boards have signed the charter since October 2014. Those who signed the Charter pledged to:

- **Identify need** by gathering information about homeless health and including it in local plans
- **Provide leadership** and encourage local agencies to work together
- **Commission services** that welcome people who are homeless and meet their health needs.

Despite the campaign and the welcome action taken by many Boards, a significant number failed to sign the pledge. Among those that did sign, the most common action taken was to ensure the health needs of people experiencing homelessness were included in JSNAs. This is useful in forming the basis of decisions about commissioning and service design for people who are homeless, but it is limited in terms of leading joined-up strategic approaches to reduce homeless. This is mainly due to the sheer size of their briefs, making it difficult to focus on specific client groups in significant depth.

This demonstrates that while HWBs have a vital role in identifying need and coordinating health and social care actors, they have shown that they cannot be expected to be the main site for strategic approaches to tackling homelessness in the local area.

St Mungo's would like to see HWBs including the health needs of single homeless people in each JSNA, working with homelessness agencies and people with lived experience to collect this data. While not being sites for strategic oversight, there should be a strong interface between HRBs and HWBs, with assessments of need informing HRB working.

Safeguarding Adults Boards (SABs)

The overarching purpose of a SAB is to safeguard adults with care and support needs. People sleeping rough are significantly more likely to face multiple disadvantage, and be victims of abuse and neglect. These Boards therefore have an important role in keeping vulnerable groups such as people sleeping rough safe.

SABs lead adult safeguarding arrangements across their area, and work collaboratively with a variety of agencies to prevent abuse and neglect, and developing effective responses when this does occur. Specifically, SABs must commission safeguarding adults reviews (SARs) for any cases where an individual dies or is seriously injured, and abuse or neglect is suspected or known.

While 597 people died while homeless in 2017, only a handful of these deaths resulted in a SAR – despite abuse and neglect (including self-neglect) being commonly experienced in the lead-up to the majority of such deaths⁷.

SARs are effective at identifying system failings and prompting multi-agency approaches to better support vulnerable people. When carried out, SARs into deaths of people sleeping

⁷ In London, SARs into the deaths of 30 individuals were carried out between 2015-2017, of which 1 individual lived in 'temporary accommodation' (5 individuals were 'not specified'). This is significantly lower than the number of rough sleeper deaths in London. S. Braye and M. Preston-Shoot (2007) [Learning from SARs](#).

rough have been highly illuminating and effective.⁸ They offer an opportunity for reflection, collaboration and reform – but are too rarely used for people sleeping rough, who are often not within the social care ‘system’ and therefore not picked up or viewed as needing a SAR. This is partly driven by the significant resource constraints faced by SARs.

SABs can be important vehicles to improve the safeguarding of people sleeping rough, scrutinising arrangements and ensuring timely access to Care Act assessments. SARs can trigger changes which benefit people sleeping rough. However this does not represent whole-system accountability over homelessness, given the safeguarding focus and crisis-oriented nature of SARs. There must be a clear interface with HRBs, and close working arrangements.

The role of statutory structures in tackling homelessness

There is a clear need for statutory structures and individuals with statutory roles to be doing more when it comes to strategic and operational conversations about how to reduce homelessness. In St Mungo’s experience, operational conversations happen frequently in a variety of settings and forums – but this often fails to translate to a strategic level, limiting the ability of services to transform how they work and deliver person-centered approaches.

St Mungo’s recommends:

- **The Government should drive forward new efforts to get statutory bodies to play their part in tackling homelessness.** This includes a refresh of the 2018 Rough Sleeping Strategy delivered this summer, with meaningful cross-government co-ordination, and implementation plans from each department setting out how they will build on the initiatives currently underway and improve their systems collectively to tackle homelessness. This will ensure statutory bodies are led from the top in acting to tackle homelessness locally.
- **The Government carry out a review of the Duty to Refer**, to see how operational working is delivering in practice. This could pave the way for a new duty to co-operate, to deliver improved operational practice between statutory partners.
- **HRBs established on a statutory footing**, to ensure individuals with statutory roles are involved in strategic approaches to tackling homelessness, and are held accountable for their role.

Two-tier authorities

Question 7: For homelessness services alone, what are your views on how effective two-tier working is in your area, the specific challenges in two-tier working and/or the opportunities for strengthening joint working in two-tier areas?

Question 8: If you work in an area with two-tier local government, which individuals in a higher or lower tier of local government do you believe should have a responsibility for reducing homelessness and do you think they are already involved in strategic and operational conversations? Please explain your answer.

⁸ In 2017 Brighton and Hove published a SAR report into the death of a homeless individual who died in 2014, as well as an audit of homelessness in the city; Brighton and Hove SAB (2017), [Safeguarding Adults Review X](#).

Most areas where St Mungo's works are single tier local authorities. However, it is clear that two-tier areas come with their own challenges when developing responses to homelessness. Housing sitting at the district level, with social care and strategic planning at the upper tier, can create notable barriers to partnership working.

In two-tier areas there should be a clear joint approach between district and county levels, with regional and sub-regional arrangements in place where appropriate.

Working together across borders – partnerships in North London

Sub-regional working can be effective anywhere – not just in two-tier areas. The North London Housing Partnership is a strategic umbrella organisation that brings together housing and homelessness managers working within the following six North London local authorities: Barnet, Camden, Enfield, Haringey, Islington and Westminster. The group meets monthly with partners where service heads and managers share best practice, review services and discuss opportunities for coordination around homelessness. Within this there are a variety of additional aspects including:

- Joint Rough Sleeper Leads Group: a quarterly meeting between the borough Rough Sleeper Commissioning leads, Community Safety and voluntary agency stakeholders (including street outreach team managers) who meet to share knowledge, learning and best practice, identify areas for coordination and joint working, and oversee sub regional rough sleeping projects.
- Supply and Policy Group – a quarterly meeting for Temporary Accommodation and Housing Policy managers to discuss and coordinate work plans.
- Directors Board – a quarterly meeting for Housing Directors from each borough to provide a strategic steer and oversight for sub regional working.

Reducing homelessness should be a priority at all levels of government, local or national. Bringing decision making close to the communities affected has clear benefits in encouraging stronger buy-in and accountability, but there will need to be different structures depending on local dynamics. The priority is to ensure the right people are making decisions in the right places, and in many cases this will necessitate close cross-tier working.

Homelessness reduction boards

Question 9: What are your views on whether the aims for Homelessness Reduction Boards could be met by amending the remit and function of existing local non-statutory and/or statutory structures?

Question 10: What are your views on the merits and drawbacks of establishing Homelessness Reduction Boards, and whether we should establish them?

If we were to establish Homelessness Reduction Boards:

Question 11: What do you think their purpose and objectives should be?

Question 12: In which authorities should Homelessness Reduction Boards be established (e.g. in all local authorities, areas of high homelessness, top-tier authorities only)?

Question 13: Who should be members of Homelessness Reduction Boards?

Question 14: What is needed to make Homelessness Reduction Boards effective (e.g. guidance, legislation, incentives etc)?

St Mungo's agrees that reducing homelessness is not always given the attention needed under existing structures. There is no simple adjustment to existing statutory structures which would address this. Instead, the Government should look to formalise existing good practice and raise the bar in areas where such practice is lacking, by placing Homelessness Reduction Boards on a statutory footing.

Merits of this approach include:

- **A whole-systems approach to tackling homelessness** – by placing a statutory duty to establish and participate in a HRB, homelessness will become everybody's business, with partner agencies brought round the table to address problems in a strategic joined-up way.
- **Vehicles for culture change** – HRBs will embody certain values and principles, including collaboration, a focus on place, and an emphasis on the whole person. This means designing services around individuals and their multiple needs, not expecting people to fit into pre-existing structures, an approach which will hopefully spread across organisations.
- **Security and stability over the long-term** – the non-statutory basis to most homelessness structures makes their existence highly reliant on individual leaders in the local area. HRBs on a statutory footing would reduce the risk of efforts being eroded when posts change hands, with more sustainable and secure approaches developed over the long-term regardless of administration.
- **Shift from crisis management towards prevention** – taking a strategic approach with an emphasis on long-term transformation provides the vital opportunity to address the drivers of homelessness long before individuals reach crisis point or HRA duties are triggered. This can involve pooled-budgets and resource and information sharing.
- **Improved working across local authority boundaries** – by creating a baseline, structures will be more consistent across local authority areas. This will allow local areas to interact more effectively to tackle homelessness (e.g. by developing complementary local connection policies).

However, there are clear challenges associated here too. There is a risk that in creating statutory duties, HRBs could supplant well developed good practice, turning deep and meaningful existing partnerships into a prescriptive tick-box exercises. Current effective arrangements, with multi-layered structures of boards, forums and case management could be undermined, replaced by one high-level unaccountable structure. The Government should be clear, in particular, about the relationships between strategic boards and operational case management – recognising these distinctive functions and ensuring both continue to exist and link in with one another.

There is the wider risk that without significant additional funding, HRBs will lack the means to make a serious impact. The Government should play its part, in providing adequate funding, clear guidance, and addressing the external challenges which will create the biggest challenges for HRBs – namely the lack of social rented housing, affordability and stability in the private rented sector, and welfare reforms which increase individuals' vulnerability to homelessness.

Considerations for establishing HRBs

To be effective HRBs should learn from the structures already out there. Crucially, they should act as an anchor in the local system with new powers and authority. HRBs could be the statutory component of a multi-layered system, with non-statutory local homelessness forums, case management groups, and implementation teams expected to feature in the wider ecosystem. Or these other layers could be folded into what is expected to be overseen by the board. This will require further analysis and consultation.

The Government should be clear about the intended purpose and remits of HRBs, before embarking on further consultation over the exact structure. St Mungo's has some initial suggestions:

- HRBs should be responsible for overseeing the strategic approach to reducing homelessness and rough sleeping in the local authority area. This includes responsibility for consulting on, developing, and scrutinising implementation of the local homelessness and rough sleeping strategy and associated annual action plans.
- HRBs should be chaired by a senior leader (cabinet level), meeting at least quarterly. There may be task and finish groups on individual topics established too (e.g. the specific needs of women).
- The Board should be made up of a core group of statutory bodies who have a duty to participate. This includes the local housing authority, Adult Social Services, Public Health, Clinical Commissioning Group or other NHS representation (e.g. NHS Trust), Police, Prisons, Probation, and local authority strategic leads for violence against women and girls (VAWG). This will help to ensure homelessness is regarded as a priority for all parts of the local system.
- In addition to the statutory core membership, other non-statutory groups should have representation on the Board. This includes the voluntary sector, domestic violence services, housing association/providers, faith groups, individuals with lived experience, local businesses and service providers.
- Boards should be equipped to hold local partners to account for their actions. Similarly, the Board should be transparent and itself be accountable for the overall level of homelessness, publishing strategies, annual reports, and data and outcomes regularly. Appearing before scrutiny committees and homelessness forums could ensure the Board is held to account.
- Co-ordinating the various parts of the homelessness 'system' and leveraging multiple agencies to improve practices for this group should be a priority for Boards. Pooled-

budgets and resource and information sharing will deliver this in practice, with the possibility of shared objectives embedded in organisational targets with shared KPIs.

Interacting with other homelessness structures

It is important HRBs do not subsume existing structures and become the sole site for decision making. There should be further consideration about whether HRBs should be single tier strategic boards, or have two-tiers of both strategic and operational functions. Either way, there should be consideration of the need for other structures or functions including:

- A local implementation team / delivery unit responsible for delivering the local homelessness and rough sleeping strategy. This team can report to the board, who are able to co-ordinate the system to address blockages. This work involves recording and analysing data, which is used to determine strategic priorities.
- A homelessness reduction forum bringing together key stakeholders including service users, the public and community groups to consult on the strategy and associated activity. This will ensure buy-in from all non-statutory services and community representatives who do not sit on the board, ensuring efforts are not fragmented or undermined.
- Operational case management groups to co-ordinate person-centred responses in individual cases, getting the relevant agencies together to find solutions. These groups should have a clear interface with the Board, being able to identify trends and common experiences which require wider systems change at a higher level.

In the above scenario, the HRB could be the statutory anchor which co-ordinates and oversees other non-statutory multi-agency initiatives and structures developed according to local needs. Or these other structures could be established as part of the statutory duties for the Board. This will require further consultation.

Establishing the geography of HRBs

The appropriate tier of local government for HRBs will largely depend on local circumstances. Where possible, they should be aligned with the boundaries for the local authority with responsibilities for housing – invariably district councils. This will allow the HRB to oversee development and implementation of the local homelessness and rough sleeping strategy. For rough sleeping particularly, the variation within regions is significant, making developing initiatives at large scale challenging and creating tensions between local areas.

Whether it is legally required for HRBs to sit at district level will require further consultation. It may be appropriate to establish this but allow alternative arrangements in extenuating circumstances, where Boards could sit at county level if that better suited the particularly local dynamics.

Regardless of the site, we strongly believe all local authorities should be represented by a Homelessness Reduction Board. There will be variance in resourcing and capacity relative

to need, but the same statutory structure should exist in all areas, to ensure a consistent level of response across local authority boundaries. This will be important to encourage action where the issue is currently neglected – particularly outside of major cities and large towns. This will reduce the possibility of a ‘race to the bottom’ in service provision where areas fear ‘attracting’ need, but instead step up and play their part across boundaries.

It is vital that structures are in place to facilitate partnership at the county and city level, working across HRBs and district council boundaries. This is true in two-tier and unitary areas, and these partnerships may be regional or sub-regional (across a collection of districts).

At the upper tier level there could be a forum with chairs of each Board established across local authorities. This upper forum should meet less regularly, but have a clear interface with forums that exist across a larger geographic footprint (e.g. the Sustainability and Transformation Partnership, working with Police and Crime Commissioners).

In particular, these upper-tier forums could establish arrangements in response to local connection, with protocols for reconnection and support developed and followed consistently. This would also allow easier integration with social care, and more easily feed-up to regional and national planning.

To make HRBs effective the single most important factor will be attaching funding to them. Without becoming arenas for financial decision-making, HRBs risk becoming talking shops, or managing scarce resources without being able to enact meaningful change. Local authorities will only be able to deliver the aims outlined in the consultation effectively and efficiently if they have certain and sustainable funding.

Research by St Mungo’s shows that nearly £1 billion less was spent on Supporting People services compared to 2008/9. The oversight and accountability provided by HRBs should give the Government the confidence to restore levels of funding to that spent before the financial crash, by investing an extra £1 billion a year on tackling homelessness.

Given the wider pressure on local authority budgets, there must be a mechanism for ensuring additional funding is targeted at activity to prevent and reduce homelessness. Without this, the money will be spent on other priorities. We believe it should be ring-fenced for homelessness and housing related support services to ensure everyone who is homeless, or threatened with homelessness has a tailored package of support that will help them end their homelessness for good.

Other ways of supporting effective partnership working

Question 15: Other than through the creation of structures and roles, how else do you encourage effective partnership working in your area?

Question 16: Where there is effective partnership working in your area, what are the characteristics of this and what makes the partnership effective?

Question 17: What data exists locally to help delivery partners design services and interventions to reduce homelessness and monitor implementation, and how effectively do you think the data that is available is used?

Question 18: Are there good examples of how data is being used effectively in your area and what do you think prevents the effective use of data?

Question 19: What do you think we should consider and include in the design of the data pilots?

Question 20: Do you think a Duty to Co-operate should be introduced and, if so, how do you think a Duty to Co-operate could be designed to work in practice, and what steps can we take to ensure that a duty is practical and effective?

Question 21: What else could the Government be doing to support partnership working across local delivery partners in an area to systemically reduce homelessness?

Encouraging partnership

Funding pressures are the greatest barrier to effective partnership working at the local level. As financial pressures have increased across local authorities, health, social care and criminal justice, so too has silo working, as each agency or service protects its own patch. Increased funding is a vital condition for improved partnership working.

Wider structural factors, including the lack of social housing, unaffordability and insecurity of the private rented sector, and Universal Credit rollout, have seriously hampered the ability of local systems to respond in an effective and joined-up way to homelessness. The Government should tackle these drivers of homelessness as a priority.

The Government also has a role in driving partnerships from above, by developing cross-Government approaches to tackling homelessness. The Rough Sleeping Strategy was an important start point in getting cross-departmental buy-in for ending homelessness. There has been welcome developments from other agencies and departments, including NHS England committing £30 million spending on specialist mental health services for people sleeping rough⁹, and the Ministry of Justice delivering resettlement pilots in prisons¹⁰. However, these will be limited in scale and only impact a small minority of areas.

The Rough Sleeping Strategy 2018 committed the Government to *'yearly updates which will show our progress on the manifesto commitment and outline new policies we plan to take forward once the evidence is in place to prove they work. We will also go on to develop a strategy to address wider homelessness and will be outlining our work in that area in the coming months.'*¹¹

We hope this will be published by the anniversary of the Rough Sleeping Strategy in August. We expect progress towards meeting the manifesto target to include full updates from relevant departments, with implementation plans developed to ensure strategic partnership approaches across Government.

Duty to co-operate

We support the principle of creating of a Duty to Co-operate, but would welcome more detail on the form that this would take and how it would relate to the work of HRBs. The two proposals outlined in the consultation document, either for agencies to work together on

⁹ NHS (2019), *Long Term Plan* <https://www.longtermplan.nhs.uk/wp-content/uploads/2019/01/nhs-long-term-plan.pdf>

¹⁰ Ministry of Housing, Communities and Local Government (2018), *The Rough Sleeping Strategy* https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/733421/Rough-Sleeping-Strategy_WEB.pdf

¹¹ Ibid.

individual cases or to reduce all homelessness in the local area, are distinct from one another and more information about their potential structure and aims would be useful.

St Mungo's staff who are involved in the local delivery of services have reported that it can be exceptionally difficult to ensure that all key partners co-operate fully in both the delivery and planning of local services, particularly when these partners do not clearly have homelessness prevention as part of their remit. For example, local social care and NHS teams can prove difficult to engage, in spite of the fact that a large number of people who have slept rough also have social care needs.

The consultation document notes that the Duty to Refer, introduced as part of the Homelessness Reduction Act, has enhanced working between delivery partners. We have received reports that the implementation of this Duty has been patchy, with different organisations becoming more engaged than others. This is understandable, as the Duty has only been in place since October 2018 and may not have been fully implemented. However, a full review of how the Duty has been introduced would allow for scrutiny of this.

We are aware of some key omissions from the Duty to Refer – such as GPs – and would welcome a comprehensive consultation on which bodies should be included in a Duty to Co-operate, and how local stakeholders would be incentivised to take part. Co-operation involves going well beyond simply referring individuals between services, instead working together to deliver services in a person-centred and collaborative way.

True co-operation between different delivery partners will require a structure to support it. Homelessness Reduction Boards could offer the forum for a strategic duty to co-operate, with case management groups overseeing its application to individual cases. Systemic change beyond introducing a new Duty is required to create strong working relationships across different organisations, so should be closely related to any new accountability structures.

The potential of a Duty to Co-operate to address all cases of homelessness in an area, beyond services working together on individual cases, could support greater integration at a strategic level. However, the MHCLG would need to be clear what the purpose of such a Duty would be, how it would be enforced, and how different delivery organisations would be supported to take part.

Data

There is a real need to make significant changes to the way data is collected, recorded, shared and acted upon when it comes to homelessness. Data is a powerful tool for partnership working, should form the basis for local accountability, and allows effective allocation of resources from both central and local government.

Data systems will not look the same everywhere, and should be developed according to local need across different geographies. There is no one system which would be rolled-out nationally, with local areas responsible for developing and maintaining their own systems.

But while it would not be helpful to be overly prescriptive about data systems, there is need for a national data standard, to ensure the comparability of data across wider geographies. This would necessitate minimum data requirements on a national level, developed in consultation with stakeholders and individuals by lived experience.

Improved data can identify need and improve outcomes for specific groups, particularly women. Women sleeping rough are often missing from administrative datasets collected by homelessness services and other agencies, because they may not be in contact with some services and there is evidence that they avoid contact with some homelessness services. A multiple data point approach, including data merging and survey methods, allows for the specific needs and experiences of women to be identified and more appropriate services to be designed in response.

For these reasons, HRBs should be required to develop updated data systems used across the local authority area. Data should be used to assess extent of homelessness and character of individual needs, establish the effectiveness of interventions in preventing and ending homelessness, and identify gaps in provisions.

Data should inform all responses developed in the area, act as the basis for accountability of services to the HRB and of the HRB to the wider community and central government. A strong evidence base should inform all work carried out by the board.

New posts and funding will be required to achieve this. Accurate and meaningful up-to-date data requires workforce and resources. An implementation team, suggested above, could be the natural site for gathering and analysing data, communicating this to the HRB. Some features of data collection include:

- Data should be gathered and analysed by a delivery team to understand changing profile and needs of people sleeping rough and the outcomes for individuals and groups.
- A local data system should enable sharing of information between services and agencies, throughout a client's journey.
- Data systems should be able to analyse different groups including, for example, people who are sleeping rough for the first time or people who have returned to the streets after a period in accommodation, as well as supporting a distinction being made between people seen sleeping rough and other street based activities such as begging.
- Services should be required to measure and report on how successful they are at ending an individual's homelessness, with monitoring of long-term client outcomes embedded in all service models.
- Data should be used as the basis for a thorough appraisal of current service capacity effectiveness, with gaps in provision identified.

Developing data in this way would allow a much deeper understanding of need compared to the current annual count. This would allow funding allocations to be informed by a more reflective formula, collected in a more rigorous way on a continuous and consistent basis. With a national standard for data collection in place, Government should have the confidence to invest the necessary £1 billion in funding for homelessness services, with clear expectations for new data systems to ensure effectiveness of spending and outcomes achieved.

Counting the numbers: the CHAIN approach in London

CHAIN is a multi-agency database recording information about people sleeping rough and the wider street population in London. The system, which is commissioned and funded by the Mayor of London and managed by St Mungo's, represents the UK's most detailed and comprehensive source of information about rough sleeping. CHAIN allows users to share information about work done with rough sleepers and about their needs, ensuring that they receive the most appropriate support and that efforts are not duplicated. Information recorded includes people's support needs (e.g. mental health or substance use problems), the individual's circumstances, and key outcomes, actions and events

CHAIN is not the only model for data collection, with other approaches developed in Oxford, Manchester and Brighton. Each has been configured to most appropriately respond to the particular needs and gaps in the respective local areas.

Equalities

Question 22: Do you think that any of the issues discussed in this consultation could or already do have a disproportionate impact, positive or negative, on any individuals, in particular those with 'relevant protected characteristics' (i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation)? Please provide evidence to support your response.

Question 23: How could any adverse impact be reduced and are there any ways we could better advance equality of opportunity? Please provide evidence to support your response.

Any efforts to encourage partnership at the local level has the opportunity to improve services for a variety of groups – including women, those with disabilities, and BAME individuals. This is because one-size fits all responses to homelessness presently neglect the specific needs of these groups.

The fragmentation between homelessness and domestic violence services or mental health services can have serious and disproportionate negative consequences for vulnerable individuals who rely on these services. Bringing partners representing these services to a decision-making forum will aid efforts to develop person-centred offers which reflect the level of need and particularities of individuals' experiences.

However, this is contingent on representatives from these services and communities having a seat at the table. Without diversity recognised and represented, systems change has the potential to further exclude marginalised groups – having a disproportionate negative impacts on the service user experience.

A more rigorous and comprehensive approach to data will further shine a light on the issues of neglected groups. For example, women are underrepresented in rough sleeping statistics, being more likely to be 'hidden' homeless. This presents an opportunity for new data systems to more accurately identify need – as well as the outcomes for particular groups.

We are concerned that domestic abuse, a core driver of women's homelessness, is not mentioned anywhere within the proposals for improving accountability arrangements. St

Mungo's supports the response to this consultation from the National Housing and Domestic Policy and Practice Group, which highlights how the response to domestic abuse must be an essential part of proposals to improve homelessness service provision.

***If you have any questions about this submission please contact
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