Homelessness Strategy Statement 2017-2021.

Introduction

This strategy sets out Bolton's aim to tackle and prevent homelessness across the borough and details how Bolton will continue to work in partnership to provide housing options and homelessness services for the people of Bolton over the coming years.

The 2017 – 21 strategy is set within a context of continuing change in national and local government, and within housing in Bolton. Whilst building on the original aims and objectives of earlier strategies, this comes at a time of increasing pressures upon local authorities and partner agencies and major challenges to funding underpinning viability of major elements of provision. This strategy intends to ensure that there is continued buy in from across the Council and its partners in the prevention of homelessness; commitment to maintaining a viable range of services and interventions to both prevent homelessness and to offer appropriate assistance where necessary.

- Prevent homelessness through a range and quality of the housing options available through the provision of appropriate housing and support;
- Enable people to maintain their accommodation or secure more suitable accommodation where possible; and
- Provide appropriate services and interventions to those people experiencing homelessness and ensure that they are supported to play a full and positive role within the community in which they live.

Key themes and priorities which have served this evolving strategy well are maintained however set in the wider context of challenges and opportunities presented by Public Servicer Reform, Greater Manchester Devolution and risks presented by Welfare Reform.

The changing context

This strategy has been developed in accordance with the Homelessness Act 2002, and in the light of Localism Act 2011, Welfare Reform Act 2012, government guidance from the Code of Guidance 2007, and Ministerial Working Group papers, "Making Every Contact Count: A joint approach to tackling homelessness" and "A vision to end rough sleeping." and is intended to:

- > tackle the complex underlying causes of homelessness;
- > offer earlier prevention interventions; and
- > provide an integrated approach.

Implementation of the Homelessness Reduction Act 2017 is anticipated during 2018/19 – possibly by 1st April 2018 – will place a wide range of additional responsibilities on local housing authorities.

These additional responsibilities are set against a backdrop of decreasing resources, increasing barriers and competition within the housing market, and an evolving need profile that is increasingly complex.

Nationally, uncertainty in the economy post Brexit vote, and concerns over further cuts to public spending and in particular the continuing pressure and further significant cuts in the funding of local authorities has presented Councils with unprecedented challenges in meeting local needs, not least in housing and the tackling of homelessness.

The Government earlier implemented a number of policy changes in relation to housing and homelessness to address a number of issues including increases in rough sleeping and presentations to Council's for homelessness assistance. These include:

- Vision to end rough sleeping (with the 'No Second Night Out' approach);
- Greater emphasis on utilisation of the private rented sector;
- Assistance to former members of the Armed Forces (via the Military Covenant) including access to housing;
- Preventative approaches to tackling homelessness;
- > Tenure reforms which provide for fixed term tenancies and affordable rents;
- Clearer responsibilities to co-operate and assist in respect of Safeguarding children and vulnerable adults as well as duties in relation to the management of high risk offenders;

The systemic impacts of measures being implemented through Welfare Reform upon the ability of individuals to maintain as well as secure accommodation allied with the challenges to Council budgets in being able to fund activity that mitigates particular needs of local communities does however present major concerns as to Council's ability to respond to the housing needs of in particular some of the most vulnerable, chaotic and complex individuals and households.

Local Context

Locally, Bolton Council has maintained a clear focus upon targeting resources to address issues as far upstream in order to prevent the necessity for more costly statutory interventions whilst also ensuring delivery of services to the most vulnerable people in the borough. The impact of the wider changes however cannot be entirely mitigated and there has been an increase in demand and pressure for homelessness and housing services.

Bolton's approach within the context of homelessness over the preceding years and moving forward can be summarised quite simply:

PREVENTION - PREVENTION – PREVENTION

- > Prevent homelessness through a range and quality of the housing options:
- Prevent the need for emergency assistance by enabling people to maintain their accommodation or secure more suitable accommodation where possible in a planned way; and
- Prevent repeat homelessness where possible by providing appropriate services and interventions to those people experiencing homelessness and enabling them to secure sustainable outcomes

In order to achieve this within a very challenging funding context Bolton remains very focussed on the shape and principles that under-pin this approach:

- Streamline prevention, alternative accommodation and assistance routes for households with greater capacity & self-reliance
- Provide bespoke personalised approaches for those with less capacity and selfreliance through:
 - Asset based approach building capacity within households and enabling those with where-with-all
 - Complex Dependencies bespoke personalised approaches for those with more enduring and complex / chaotic presentations

Through the council's service review process, internal service structures have been developed to reflect the changing context and emerging challenges.

Key achievements

This strategy statement and action plan will build upon considerable progress that has already been made in tackling homelessness. It has been made possible through interventions made by the local authority and its partners, and services provided within both the statutory and voluntary sectors.

A summary of key achievements delivered through the Homelessness Strategy 2011-16 are highlighted below.

- Co-ordinated prevention activity lower number of homelessness applications and acceptances maintained.
- ✓ Whilst bed and breakfast accommodation for homeless families with children has increased, the average 'length of stay' has been maintained well below the legal maximum.
- ✓ Whilst there have been upward pressures on rough sleeping numbers, Bolton has maintained a relatively low level of rough sleeping and has thus far managed to stem major increases as seen elsewhere.
- Continued to secure re-housing outcomes for those accepted for a re-housing duty.
- Improved tenancy sustainment services with partner landlords and Council provision of housing related support and low levels of homelessness representations.
- Maintained a tight offender management housing pathway including prison release arrangements.
- Continued maintenance of minimal 'bed blocking' with Mental Health ward liaison & planned discharges from hospital due to reasons of homelessness.

- ✓ Provision of timely family mediation to prevent homelessness of young people.
- ✓ The review of the single homelessness service & more efficient use of temporary accommodation resources through the full establishment and roll-out of the 'Gateway Approach' and MOP (Move-On Protocol) including:
 - advice, options and active turn-over case management;
 - improved temporary accommodation vacancy management;
 - increased turnover; AND
 - improved positive housing outcomes (though move-on barriers are increasing).
- Improving use of social housing stock, including development of 'downsizing' and mutual exchange processes, and tackling 'housing fraud', returning significant numbers of units of social housing to legitimate use.
- ✓ Implementation of housing repossession interventions including county court casework offer, bch Eviction Prevention Protocol, mortgage rescue, Prevention of Repossession Fund, landlord liaison and high rate of prevention outcomes.
- Use of revenue based interventions to mitigate wider economic pressures including:
 - maximising the impact of targeted use of Discretionary Housing Payments (DHP);
 - maintaining support through Local Welfare Provision; and
 - delivery of Anti-Poverty strategy including:
- ✓ Delivery of financial inclusion support including money advice, budgeting and accredited financial capability workshops. Anti-poverty and Financial Inclusion – including a wider offer around budgeting skills, money / debt advice through in particular the work of the Money Skills service and development of 'the Square' offer.

We consider that Bolton's holistic approach in supporting households under stress has very positively helped maintain less significant increases in levels of homelessness as being experienced in other boroughs and the country in general.

Overall in terms of key performance measures, Bolton has achieved considerable success in tackling homelessness in the face of major structural and systemic challenges.

Key points to note:

- Relatively successful approach to prevention but needs to adapt further to new challenges including in particular presented by the Homelessness Reduction Act.
- > No major increase in homelessness numbers locally due to very proactive prevention approach BUT a very big shift in household profile, most notably:
 - An increasingly competitive bottom end of the housing market those with least 'where-with-all' falling out of this provision – tend to be most vulnerable and complex;
 - **Increase in 'single vulnerable' cases** as %age of homelessness acceptances up from 10-15% 10-15 years ago to 40% plus; and
 - Increasing %age of singles assisted with relief interventions (ie not formal part vii acceptances) placed through supported housing, now meeting 'priority need' levels of vulnerability (as highlighted in the Homelessness Health Audit).

Bolton's Homelessness Strategy 2017 to 2021 -Key Challenges, Opportunities and Priorities

The impacts and continuing roll out of Welfare Reform and continuing squeeze on Council budgets are building to potentially a perfect storm and major concerns as to many Councils' capacity to respond to local housing need and in particular that of some of the most vulnerable, chaotic and complex individuals and households.

The context and systemic long term impact of Welfare Reform and reduction in critical council budgets undermining the ability to fund activity that mitigates particular needs of local communities is set against a backdrop of increasing competition and scarce supply of affordable accommodation.

In the context of Bolton's Homelessness Strategy and Action plan a number of key challenges are identified, including:

Maintaining supported accommodation options going forwards is absolutely critical

The continued commitment of Bolton Council to supporting the commissioned services has been central to our ability to address the often challenging issues presented by individuals and provided a major contribution to keeping the increase in rough sleeping numbers within a manageable range.

Loss of this capacity would have major negative impact upon our ability to respond to emergency and urgent accommodation needs of individuals and a major reduction in our capacity to address presenting issues and prepare people for and secure suitable alternative and sustainable accommodation.

Without this supported accommodation provision we would have:

- > Major increases in placements and associated costs for hotel & B&B use, and
- > Very significant increase in rough sleeping.

It is also worth noting that the experience in other areas where such services have been cut, there have been increase in net costs following decommissioning of supported homelessness accommodation.

The Homelessness Reduction Act 2017 provides for a considerable increase in responsibilities not only to prevent homelessness, which Bolton already very proactively does, but will also provide for clearer responsibilities to provide interventions for the relief of homelessness – through such provision as the current commissioned supported accommodation for all homeless households – not just those formally viewed as being 'in priority need'. In order to meet these increased statutory responsibilities, maintenance of sufficient supported and temporary homeless accommodation provision is critical.

Risks associated with changes to the funding of supported housing.

Central Government are reviewing the processes for the funding of supported housing. Whilst 'support cost' elements have long since been devolved to local authorities since the earlier 'supporting people' regime; government are making major changes to the mechanisms that fund rent and other direct housing costs associated with supported and temporary accommodation provision.

Essentially funding will be largely shifted into two elements, basic funding to contribute towards rent costs expressed through the provision of a LHA Maxima approach (ie Local Housing Allowance in most cases will be provided at LHA rates) allied with a local funding mechanism to top this up.

Supported and temporary accommodation is considerably more costly to deliver than mainstream housing given the need for example of additional management, specialist facilities and higher rates of turnover. Government propose to deliver any top-up funding through a local allocation.

This presents very major challenges and risks allied with the current uncertainty as to what the new system of funding will look like.

These challenges & risks include:

- Uncertainty of central Government intentions on the shape of funding mechanisms how the 'local' top-up would work – it remains difficult to make decisions on developing or re-configuring provision until the mechanisms and crucially the level of funding going forwards are known
- There is a reasonable consensus that overall level of funding will not increase and will most likely be denuded over future years – this will present potentially very significant impact on the viability of provision including in particular Benjamin Court & 'dispersed' accommodation and the Council's Lease Management Service provision as well as other commissioned schemes.
- There are potential risks of GM 'pooling' of monies. Whilst there may be opportunities in joint procurement and scope for economies with a GM commissioning approach and potential administrative savings in pooling commissioning 'expertise'; however there are also threats that areas that have retained provision may lose out disproportionately in any GM wide arrangements as well as top-slicing. There are also additional issues of removing decisions from localities where delivery ultimately has to occur, adding additional tiers of administration and bureaucracy and consequent blockages to addressing local need.

> Structural change in the 'homeless' cohort

Structurally the 'homeless' cohort has changed markedly over the last decade. Whilst there has been considerable success in provision of preventative interventions, and in particular assistance to homeless families, those households now requiring formal statutory homelessness assistance overall present as increasingly complex, exhibiting a higher propensity of challenging behaviours and lifestyles.

Those requiring full duty assistance as well as those where there are issues of intentionality have a wide variety of circumstances. There has been a clear trend towards households presenting with a range of issues often relating to difficulties with money management, affordability and ability to pay for and maintain accommodation. Allied with this there are proportionately higher levels of issues relating to child concern and safeguarding issues as well as vulnerability of adults.

Around 15 years ago, homeless acceptances included typically around 15% vulnerable single person households. More recently however this figure is consistently upward of 35-40%. This exemplifies a wider systemic picture where by the bottom end of the housing market is increasingly competitive and given a number of Welfare Reform impacts those with less where-with-all are and have been squeezed out of the housing market. A very high proportion of those households being assisted by the Council are simply not attractive to housing providers - either social or private.

Rough sleepers tend to be the most chaotic and challenging. Whilst Bolton has managed to stem to some degree the increase in number of those sleeping rough through continued provision of a range of assistance including outreach and temporary single homeless accommodation, a significant proportion do exhibit some behaviours, threats & risks that are not manageable in accommodation settings and/or do not engage readily with services in order to improve their accommodation prospects.

The securing of move-on / accommodation for those with chaotic and complex needs is increasingly challenging including the issues associated with ensuring timely move-on and maintaining through-put from temporary accommodation. The parallel challenges and disincentives for partner landlords who increasingly selective - given in part the wider funding environment – often requires greater reassurance as to the suitability of applicants and a wider approach to attract less 'risky' households.

> Health and Wellbeing – developing an asset based approach

The Bolton Homelessness Health Audit 2016 highlights a profile with a wide range of health needs including those relating to: drugs / alcohol; primary health care; a range of mental health problems including depressive and anxiety related conditions; poor dental health; high levels of smoking; and issues associated to poor diet.

Other aspects of the client profile highlighted from the audit included: low level of engagement with meaningful activity and/or ETE related activity; significant proportion with offending histories including risk management issues; and low levels of self-esteem and personal motivation.

Whilst Bolton does have a reasonable (and in comparison to neighbouring boroughs an exceptional) offer from Community Health Care nurses and processes for primary health care screening; the audit does highlight the need for a wider and deeper engagement with health matters and also activity and interventions that can and do impact positively on personal self-esteem and consequently both emotional and physical health and wellbeing.

The awarding of both the single homeless accommodation and the floating support contracts on an 'asset' based approach indicates Bolton Council's clear intention to work in a very positive and personalised way to help clients turn their lives around. In order to achieve this however there is an absolute need for a range of agencies to contribute in a co-ordinated way in delivering this.

Offers around primary health care allied with development of improved opportunities for meaningful activity and some and more personalised ETE offers are all key to this.

Further Welfare Reform Challenges

The Government's Welfare Reform agenda continues with a number of key elements being delivered over the coming two to three years, most notably:

- General 'Universal Credit (UC) Gateway' concerns and in particular the issues presented by monthly 'in the hand' payments of all subsistence and housing benefits. Whilst empowerment of many benefit recipients may be regarded as a positive thing, there are concerns that some will not have the skills or the where-with-all to manage their monthly payments effectively, in particular those with addiction related issues, giving rise to significant potential for loosing accommodation due to non-payment of rent and other charges.
- Major concern over 18-21 year old NEETs and removal of ALL subsistence and housing cost support (planned for April 2018). Whilst as a percentage of the overall claimant count this is likely to be very low, the affected number locally remains to be seen and numbers in the high tens or low hundred will present considerable additional difficulty in the securing of accommodation given the lack of personal funds or benefits to enable this. It is anticipated this will impact upon rough sleeping to some degree.
- Impact of shared accommodation rates for under 35s (from April 2019 but affecting social allocations now). This is already impacting upon the preparedness of social landlords to let to under35s who are reliant upon benefit to assist in the payment of rent. This will increasingly reduce options for under 35s, though a few housing providers are exploring alternate models of provision including low cost units as well as shared accommodation models.
- Inconsistency in DWP application of rules & processes eg inconsistency in the application of TAMF (Temporary Accommodation Management Fee – now replaced with a significant lower level of funding through the Flexible Homelessness Support Grant) as well as those related to ensuring direct TA payments. Whilst locally Bolton has very helpful individual contacts within the DWP, there has been recent systemic inconsistency in implementation which offers great uncertainty and can present major issues with individual cases.

Homelessness Reduction Act 2017

The Homelessness Reduction Act is anticipated to be implemented during 2018, possibly from 1st April.

The Act is amends Part 7 of the Housing Act 1996. Its measures include:

- An extension of the period during which an authority should treat someone as threatened with homelessness from 28 to 56 days;
- Clarification of the action an authority should take when someone applies for assistance having been served with a valid section 21 notice of intention to seek possession from an assured shorthold tenancy;
- New duties to prevent homelessness for all eligible applicants threatened with homelessness and to relieve homelessness for all eligible homeless applicants;
- > New duty to provide personalised Housing Plans in all cases;
- A new duty on public services to notify a local authority if they come into contact with someone they think may be homeless or at risk of becoming homeless.

Whilst there are laudable objectives therein and Bolton already meets a lot of the intent; the Act when implemented will however bring considerable additional legal responsibilities and administrative process burdens.

The Government do propose to provide authorities with additional implementation funding for England in the order of £61million – however given both the limited nature of this funding, the complexities of the potential formula applied to dispense this, and the range of additional challenges and threats to other funding capacities that will be coalescing in tandem – the overall burden of the new Act we anticipate to significantly exceed any short term transition funding being applied by central government.

Given Bolton's earlier approach to service reviews by maintaining a keen focus on prevention and wider service capacity around homelessness related activities (including in particular supported single homeless provision), Bolton does remain relatively well placed to respond to the new Act. However, Housing Options Officers focussing on homeless prevention and part VII assessments has reduced from 12 to 7 over the last period of cuts. This has been managed by reducing administrative burdens where possible and focussing time on direct practical interventions. The Homeless Reduction Act will present major capacity challenges given it's highly process driven and prescriptive nature.

> Maintaining coherent approach for young people:

One of the most challenging groups of people who experience threat of homelessness are young people in particular given the very fluid period of transitions through which young people go including relationship breakdowns within the family.

The Welfare Reform context for young people is particularly challenging given that young people will often be reliant upon benefit should they become estranged from parent, however allowances are generally insufficient to cover necessary costs of securing and keeping accommodation.

In this context early intervention and prevention remains absolutely critical to minimise any presentations from this client group and to return young people to the care of their family where this is appropriate.

Housing Options and Advice Services work very closely with the Leaving Care Team (LCT) (who pick up responsibility for both care leavers and other homeless 16/17 yr olds). The LCT refer homeless 16/17 yr olds through to **Time2Talk (T2T) mediation service** which provides a range of intervention to support and enable return of young people home or to the care of extended family where possible and/or will seek to secure better supportive relationships going forwards. The service takes 120 plus referrals pa, with very high levels of positive outcomes.

The T2T service has developed into providing intervention now at a much younger age in order to head off where possible any later relationship difficulties thereby avoiding presentations later on. Interventions will often take place with children aged 13 -15 years of age. There are active referral routes from schools, other youth and children services including the **RUNA project** (managed by Urban Outreach) – which undertakes interventions with children and young people who may be reported as missing from home. The missing from home work is also closely linked with the **Phoenix EXIT service** which provides safeguarding intervention with young people at risk of sexual exploitation.

The Council has also maintained a very significant supported accommodation offer for homeless young people, primarily through the commissioning of services delivered by **Bolton Young Persons Housing Scheme**. This includes supported accommodation, emergency provision and also a project for vulnerable young people who struggle to manage their own front door. They provide a significant level of services to care leavers as well as other homeless young people.

Collectively these services have provided a very positive means of offering a range of early interventions and prevention allied with a supported accommodation offer that has enabled Bolton to manage the young person cohort very effectively and reduce negative impacts on young people and helped minimise costs. The wider context of Welfare Reform, not least: the funding arrangements for supported housing; the reduction in availability of move-on options due to benefit and affordability issues; and the impending introduction of 'no housing cost benefits' for any 18-21 yr old NEETs (Not in Education Employment or Training) is and will present increasing difficulties.

The maintenance of the range of provision noted is critical to minimising the overall volume of young people who will hit the inherent systemic difficulties presented by Welfare Reform and the (un)affordability issues with the housing market.

> Management of offenders

Bolton has a very significant population of offenders. Upward of 500 offenders return to Bolton annually from custody and a large number of individuals are managed in the community.

The nature, type and associated risks with offenders vary greatly although issues of homelessness are often sighted as relevant factors in issues of reoffending and the wider management of risk.

Bolton does have reasonably tight arrangements with partner agencies for information sharing and joint casework approaches, however the associated systems have be placed under considerable strain in part due to the fundamental reorganisation of the Offender Management services as well as pressures on Police services. The Probation Service has been split into the National Probations Service (NPS-generally dealing with more serious/ higher risk of harm offenders) and the Community Rehabilitation Company (CRC- private

contracted provider managing those committing 'lesser' offences including those with high levels of acquisitive criminality amongst others).

This contracting approach with the establishment of the CRC has resulted in considerable disruption to offender housing pathways and systems will take a further period to settle.

The impact of offenders who are not effectively managed within the community can be considerable both in terms of general impact upon localities, in particular through high volume acquisitive criminality, and through offences causing serious harm to individuals. The NPS and CRC along with GMP are not in a position effectively manage these risks without a wider key partnership offer including in particular those relating to Community Safety interventions, support and accommodation.

The reframing of the Bolton's homelessness strategy is timely given the changes within the Criminal Justice system. The strategy highlights a priority to review of the **Offender Housing Pathway in order to:**

- maintain a coherent Housing Options offer;
- co-ordination with partner agencies for those being released from prison and on community sentence; and
- re-visit the application of and commitment of wider housing partnership to risk management principles

Strategic Priorities for Tackling Homelessness in Bolton

Going forward, housing services face increasing difficulty in meeting the housing needs of the borough. The securing of both interim and longer term housing outcomes is a particular problem for those in high need as well as more generally, at a time of increasing demand for affordable housing.

In terms of the highest needs including homelessness and those in precarious and unsuitable accommodation arrangements; the increased competition and relative scarcity of available suitable alternative housing presents major challenges.

Access to sufficient housing options across tenures; improving through-put and move-on from temporary accommodation; and ensuring efficient void management and allocation processes are all critical interlinked elements. Households with histories of arrears, abandonment and/or anti-social behaviour also face greater barriers to accessing settled accommodation, particularly given the high demand for accommodation. These circumstances have very significant implications for a wide range of statutory responsibilities of the Council.

Tackling homelessness requires a balance between interventions to prevent homelessness and meeting the needs of households experiencing homelessness; and the wider contexts that provide for the aspirations of the community as a whole. To focus resources and actions too far one way or the other, risks either failing those in the most immediate and pressing need or allowing an unsustainable increase in demand and wider deterioration of housing circumstances.

The preventative approach ensures where possible circumstances are addressed early and in a planned way to ensure interventions are more likely to prevent a critical deterioration. Therefore reducing household difficulties and impacts as well as minimising requirements for more costly interventions. Financial difficulties are an increasing complication requiring specialist intervention in a timely manner. The following priorities provide the strategic direction for homelessness services in the Borough:

• Priority 1: Homelessness prevention and sustainability

Continue emphasis towards prevention approaches and interventions to improve the sustainability of vulnerable households. This includes early interventions to prevent the loss of accommodation, money management support to create financially sustainable tenancies and mortgages and the provision of sustainable resettlement in cases of homelessness. Links to the development of wider life skills including education, training, financial capability and employment support will be made to enable greater chances of longer term stability.

• Priority 2: Advice and access

Ensure access to quality advice and affordable, appropriate housing options for those who are most vulnerable and in highest need. Achieve a balance in allocations between the high/urgent need cases and those with general housing need; whilst addressing the needs of those who have been excluded.

• Priority 3: Accessing interim accommodation

Reduce inappropriate use of temporary accommodation, increase through-put and ensure availability of suitable temporary/emergency accommodation when required. Ensure maintenance of viable and appropriate base line provision; including appropriate support and resettlement services.

• Priority 4: Move-on and sustainable outcomes

Promote an adequate and varied supply of accommodation within social and private rented sectors (as well as home ownership options) for both those in high/urgent need and those in wider housing need. Where appropriate, facilitate the provision of support and housing management practices that assist the long term resettlement of the needier households.