



Portfolio Holder for Housing and Communities

Item

1st May 2019

Report of	Assistant Director Policy and Corporate	Author	Karen Paton
Title	Response to the Government's Tackling homelessness together consultation		☎ 282275
Wards affected	Not applicable		

1. Executive Summary

- 1.1 The Ministry of Housing Communities and Local Government (MHCLG) published a consultation on 21st February 2019 seeking the views on how the government could improve local accountability for the delivery of homelessness services by looking at the structures that support partnership working.
- 1.2 Views are being sought on the following areas:
 - the effectiveness of existing non-statutory and statutory local accountability and partnership structures in homelessness services.
 - whether the government should introduce Homelessness Reduction Boards and, if so, how this could be done most effectively.
 - how else we might improve local accountability and partnership working in homelessness services.
- 1.3 Colchester Borough Council (CBC) in conjunction with Colchester Borough Homes (CBH) who provide the front-line homelessness service on behalf of the Council, welcome the opportunity to respond to the consultation and influence decisions made in this area.

2. Recommended Decision

- 2.1 To approve the CBC and CBH joint response to the Tackling Homelessness together consultation as shown at Appendix A.

3. Reason for Recommended Decision

- 3.1 Local Authorities have been given the opportunity to respond to the consultation. Providing services to meet the needs of households experiencing homelessness is a statutory duty and an important issue for the council and Colchester's residents. Services are provided by a variety of statutory, third sector and voluntary organisations. It is therefore in our interest to take the opportunity to try to influence decisions made on local accountability for these services.

4. Alternative Options

- 4.1 Not to respond. However, this would mean that CBC would not take the opportunity to influence government decisions on improving local accountability for the delivery of homelessness services.

5. Background Information

- 5.1 The Government's consultation paper "Tackling homelessness together" seeks views on structures that support partnership working and accountability in homelessness services. It seeks views on:
- The effectiveness of existing non-statutory and statutory local accountability and partnership structures in homelessness services.
 - Whether the government should introduce Homelessness Reduction Boards and, if so, how this could be done most effectively.
 - How else we might improve local accountability and partnership working in homelessness services.
- 5.2 The government recognises that everyone deserves a decent, affordable and secure place to live and that too many people live without the comfort of a home and a small minority are living on the streets. The government is committed to reducing all forms of homelessness and ending rough sleeping by 2027.
- 5.3 In the consultation paper the government sets out the importance of ensuring that everyone has the security of a home, all partners at both local and national level must work together in a joined-up way, commissioning and building services based on evidence. By working together homelessness and rough sleeping can be tackled effectively and services and interventions that support people when they are most in need can deliver better outcomes for them.
- 5.4 In order to work effectively together the government believes that organisations and services must also be able to hold each other to account for their actions and be accountable not only to those who need support, but also the wider society. It recognises that it needs to be clear both locally and nationally about who is responsible for delivering the services, interventions and commitments in national and local strategies that will reduce homelessness and rough sleeping.
- 5.5 Currently at the local level this will be a challenge as the delivery of services is complex, with organisations and agencies with different priorities and funding constraints operating under different accountability arrangements. There are good examples of collaborative working and integrated approaches but sometimes the complexity can limit how effectively local partners can join forces and work together on shared objectives. It can also lead to lack of ownership and accountability between different tiers of local government, between different agencies and between statutory and non-statutory services.
- 5.6 The consultation paper sets out research undertaken by the Rough Sleeping Advisory Panel which involved engagement with local authorities and other partners through a series of workshops, which highlighted that current accountability arrangements for local partners involved in homelessness service provision could be more effective.
- 5.7 The consultation is based on a commitment by the government to look at ways to improve accountability at a local level, including the potential development of local Homelessness Reduction Boards.
- 5.8 The focus of the consultation is specifically on how non-statutory and statutory structures might play a stronger role in assisting local partnership working, enabling delivery partners to work together both strategically and operationally to reduce homelessness and rough sleeping, and holding them to account for their actions.

5.9 The full consultation document can be found by following the link below:

<https://www.gov.uk/government/consultations/tackling-homelessness-together>

5.10 The joint CBC and CBH response to the consultation 'Tackling Homelessness together' can be found below at Appendix A.

6. Equality, Diversity and Human Rights implications

6.1 The purpose of this report is to respond to the Government's consultation paper "Tackling homelessness together". Any policy changes brought forward as a result of the outcome of the consultation would be subject to appropriate equality impact assessment.

7. Standard References

7.1 Strategic Plan

The response has been written to reflect the Council's Strategic Plan 2018-2021: Wellbeing - Target support to the most disadvantaged residents and communities.

7.2 Consultation and Publicity considerations

Colchester Borough Council's response to this consultation paper will be published on the Council's web-site and will therefore available to the public and stakeholders.

7.3 There are no references to financial; community safety; health and safety or risk management implications.

Appendices

Appendix A: Colchester's response to the MHCLG 'Tackling Homelessness together' consultation.

Appendix A

Tackling homelessness together

A consultation on structures that support partnership working and accountability in homelessness

Consultation Questions

2. Existing accountability structures

Non-Statutory structures

Question 1: What non-statutory structures are you aware of in your area that cover homelessness as part of their agenda? For each of these please indicate which of the following could be considered one of their objectives:

- a) Developing a strategic vision for tackling homelessness in the area;
- b) Agreeing actions that each delivery partner will take forward to help reduce homelessness;
- c) Co-ordinating use of funding and resources to reduce homelessness;
- d) Evaluating the effectiveness of homelessness services and interventions;
- e) Monitoring progress towards the delivery of the local homelessness strategy;
- f) Holding the local housing authority to account for the outcomes they achieve with people who are at risk of homelessness or are homeless, using key data and evidence;
- g) Holding delivery partners to account for the outcomes they achieve with people who are at risk of homelessness or are homeless, using key data and evidence;
- h) Discussion of how to manage individual cases;
- i) Support for specific vulnerable groups, for example offenders; and
- j) Other, please specify.

Homelessness and Rough Sleeping Strategy Project Group – a, b, c, d, e, f, g, I

Essex Housing Officers Group – a, d

Essex Homelessness Officers Group – b, d, f, I, j (developing Essex wide protocols)

Essex Vision/Prevents - a, b, c, d, I, j (developing Essex wide protocols)

Colchester Homeless Action Panel (CHAP) – b, h, I, j (identifying a support and accommodation pathway for people that are entrenched street homeless)

Joint Referral Panel (JRP) – h, I, j (identifying an accommodation pathway into supported housing to meet the needs of the individual)

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

The non-statutory structures in the area are very effective as they provide good partnership working opportunities, sharing good practice, continuity across Essex in terms of protocols, joint working to identify the best outcome for the individual (CHAP, JRP)

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?

Non-statutory structures are limited in driving systems change as they are predominantly operational. However, the Homelessness and Rough Sleeping Strategy Project Group work well in supporting the reduction of homelessness especially by identifying the key priorities for the area which all the partners sign up to help deliver. Some of the groups identified have been in existence for years and have a 'terms of reference' that all partners sign up to which is a good way of holding them to account. Agreeing joint protocols are also a good way of reducing homelessness and holding partners to account.

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?

Regarding the statutory structures mentioned in the consultation document (2.8), at Colchester BC this is often Director led or attended by senior Managers and good working arrangements are developed at this level. There are also good working relationships with these organisations at an operational level. However there could be improvement on how these strategic and operational structures join up better both vertically and horizontally across the organisations to help in the reduction of 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?

All the structures mentioned above (2.8) should include conversations about how they are contributing to the reduction of homelessness. A Manager or Officer with responsibility for the reduction of homelessness should be attending and contributing to conversations.

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?

The structures should be aligning their services to the local Homelessness and Rough Sleeping Strategy so that it links together to avoid any duplication and doesn't create any conflict to the work that is being developed to reduce homelessness

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?

Challenges in two-tier working in homelessness services:

- Lack of understanding of the work of the district authorities
- Different objectives/priorities
- Financial constraints
- Duplication of homelessness prevention – Trailblazer
- Mistrust of upper tier due to previous funding issues around recommissioning of homeless services.

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.

As Homelessness services have historically been the responsibility of the districts, they have developed processes and procedures both strategically and operationally in this area. The upper tier authority lacks the specialist knowledge, understanding and experience to deliver these services. District authorities are better placed because specific homelessness issues, resources and circumstances are different across Essex, as it is made up of 14 Local Authorities (2 of which are Unitary). Some districts are urban, and some are rural with different levels of homelessness. Therefore, they require a different response to reducing the problems associated with it.

3. 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?

Non-statutory structures are too operationally driven and detailed actions.
Statutory structures do not have enough of a homelessness focus.

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

We do not consider that in a two-tier authority there are any merits to having a Homelessness Reduction Board as across the county homelessness issues and priorities are different. However, this could work at District level as it could deal with the challenge of joining up strategic and operational services as mentioned above in question 4.

If we were to establish Homelessness Reduction Boards:

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

In terms of the purpose and objectives of a Homelessness Reduction Board, we agree with those set out in section 3.7 of the consultation document. However, this should operate at a local level and align with the purpose and objective of Colchester's Homelessness and Rough Sleeping Strategy Project Group.

If we were to establish Homelessness Reduction Boards:

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)?

Homelessness Reduction Boards should be established in all local authorities but at district level as all areas have different circumstances, needs and priorities and should be responsible for their own services both strategically and operationally.

If we were to establish Homelessness Reduction Boards:

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

All the organisations that have a 'duty to refer' under the new Homelessness Reduction Act should be represented.

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

Legislation and Guidance including the code of guidance, should be embedded at the core of the Homelessness Reduction Boards to make them effective. There is a need to ensure that all statutory partners are aware of the legislation around homelessness and operate within it.

4. 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?

Partnership working with the voluntary sector is good. Understanding and taking an interest in organisations locally and how we can work effectively together is key. Excellent buy in for the Homelessness and Rough Sleeping Strategy as good relationships have been built up over time, which requires trust.

There is also examples of good partnership working across district local authorities including joint bids for government funding and well attended strategic and operational groups.

Partnership working with statutory organisations is a challenge. Protocols and secondments help but sometimes lose effectiveness over time due to staff changes as often these have been led by specific individuals. There is also a lack of trust as often social care etc. are looking to offload their responsibility for tackling homelessness on the local authority under a statutory duty.

Recommissioning of support services has also damaged the trust that districts have with Essex County Council.

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

As also covered above, effective partnership in our area is based around:

- Agreed priorities
- Buy in as everyone has a vested interest
- Openness and trust
- Working together and not dictating

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?

The P1E was effective but is no longer available. H clic should improve the data available but this is still being developed. In some areas data is used effectively especially benchmarking and to show service performance outcomes. However, there is still too much reliance on anecdotal evidence where data exists.

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?

Data is effectively used for the Housing and Homelessness Strategies Evidence base. The data is used to help monitor the implementation of the strategies and homelessness services and policies.

The effective use of data is prevented by the lack of resource to analyse the data properly.

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

The data pilots should include information that is relevant and meaningful, area based and tailored to local problems and issues.

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?

We agree with paragraph 4.6 above that a Duty to Co-operate should be introduced and maybe run as pilots to see how it could work in practice. To make it effective it should include an action plan to show what actions organisations have taken to prevent and relieve homelessness and fulfill the requirements set out in Personal Housing Plans.

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

Partners should be given a statutory responsibility to prevent homelessness e.g. Essex County Council – Health and Social care and the Ministry of Justice especially around discharge etc.

5. 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.

No. We consider this to be covered under the Homelessness Reduction Act and the Homelessness Code of Guidance.

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.

Colchester Borough Council have EQIA's on all new strategies and policies and these are updated every 3 years. Therefore, any adverse impact would have been considered through Colchester's Homelessness Strategy and the Gateway to Homechoice Allocations Policy.