

 Brent	Lead Member for Housing and Welfare Reform – Individual Member Delegated Decision 26 September 2019
	Report from the Strategic Director of Community Wellbeing
Homelessness & Rough Sleeping Strategy (2020 – 2025)	

Wards Affected:	All
Key Decision	Non-Key Decision
No. of Appendices:	Three Appendix 1 Homelessness Review Appendix 2 Homelessness Review – Activities Register Appendix 3 Strategy Document
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1.0 Purpose of the Report

- 1.1 This report sets out the key findings from a recent review of homelessness services provided in the borough, and the subsequent draft Homelessness & Rough Sleeping Strategy (2020 – 2025). The report invites the Lead Member for Housing and Welfare Reform, in consultation with the Leader, to agree to commence formal consultation regarding the draft strategy.

2.0 Recommendations

- 2.1 Agree that the results of the homelessness review and the draft Homelessness and Rough Sleeping strategy be published;
- 2.2 Agree, in consultation with the Leader, to commence an 8 week consultation process on the draft Homelessness and Rough Sleeping Strategy.
- 2.2 Note that after the consultation process, the finalised version of the Homelessness and Rough Sleeping Strategy will be submitted to Cabinet in January 2020 for consideration and approval.

3.0 Detail

- 3.1 Under Section 1(1) of the Homelessness Act 2002, every local authority in England has the power to carry out a homelessness review for their district and formulate a homelessness strategy based on the results of that review. Section 2(1) of the Homelessness Act 2002 states that a homelessness review should consider:
- The current and likely future levels of homelessness within the local area;
 - The activities which are carried out for preventing homelessness as well as securing accommodation or providing support for those who are, may become or have been homeless; and
 - The resources allocated to these activities.
- 3.2 Pursuant to section 1(4) of the Homelessness Act 2002, the Council must exercise its power to carry out and publish a homelessness strategy so as to ensure that a new homelessness strategy for their area is published within the period of five years beginning with the day on which their last homelessness strategy was published.
- 3.3 In August 2018, the Ministry of Housing, Communities & Local Government (MHCLG) published the Cross-Government Rough Sleeping Strategy, which committed to ensuring that all local authorities have an up to date homelessness strategy, which is available online by winter 2019. They also asked that strategies be rebadged as *homelessness and rough sleeping strategies*.
- 3.4 Given the considerable changes brought about by the application of the Homelessness Reduction Act in April 2018, we have taken the opportunity to use these powers to carry out a review that aims to really understand the changes in demand that have presented themselves; reflecting on what the data can tell us, and what new insights our new responsibilities have generated.
- 3.5 The review covered the considerations set out in 3.1, but also sought to understand the lived experience of those experiencing homelessness and rough sleeping, both by carrying out qualitative research with those individuals, and through gathering the knowledge from partners through the Homelessness Forum, which comprises key partners from across the statutory and voluntary sector. The review sought to evaluate current services, identify need and set a strategic vision.
- 3.6 A copy of the review is attached at Appendix 1, with the accompanying register of activities at Appendix 2. In brief, the key findings of the review are:
- 3.6.1 The number of households in B&B with shared facilities has been unstable for the last five years for various reasons such as the introduction of the Homelessness Reduction Act 2017. Numbers have reduced in the last year and have reduced significantly in the first five months of this financial year. The number of households in B&B has reduced from 121 in April 2019 to 39 in September 2019. However, this type of emergency accommodation has an especially negative impact on the health and wellbeing of those households who use it, and should be eradicated.

- 3.6.2 The overall number of households in Temporary Accommodation (TA) has reduced by approximately 10% year on year for the last 5 years. The number of households in TA as at September 2019 is 2088, a decrease of over 1,100 since March 2015. However, the use of TA is costly to the Council, requires households to have to move too often and keeps them living in limbo and so needs to reduce further.
- 3.6.3 Accurate, reliable data, as well as insight gained through qualitative research and feedback from key stakeholders and service-users is key to understanding demand and targeting resources, enabling us to maximise the impact of what we do.
- 3.6.4 Demand for services is increasing, and although the council has a range of services and initiatives available, the high number and complexity of homelessness, makes them difficult to navigate. Communications around what services are available should be improved and support be more targeted
- 3.6.5 The Housing Crisis underpins the problem of homelessness, driven by increase in population, lack of affordable homes, and income levels not in line with costs of accommodation. The loss of a private sector tenancy is still the main cause of homelessness in Brent.
- 3.6.6 There is a need for more tailored support for specific groups, including LGBTQ, sex workers, and BAME households. The Council need to better recognise health and wellbeing needs of those experiencing homelessness, and improve partnership working.
- 3.7 These key findings were then used to produce the subsequent draft strategy. A copy of the draft strategy is attached at Appendix 3. In brief, the proposed commitments for the strategy are:
- 3.7.1 Fully understand the challenge of homelessness in Brent and how it is experienced by individuals so the Council can develop informed, targeted solutions and improve the services we deliver.**

This will be achieved by

- Embed a culture of respect and empathy to reduce stigma and work with front-line officers to drive forward a person-centred approach to our services, improving the experience of those who need to access them.
- Build on analysis carried out as part of the homelessness review to fully understand the lived experience of individuals and design effective interventions for preventing and tackling homelessness.
- Review our approach to data collection and ensure data quality is maintained so we can monitor any changing trends and more effectively target resources.

- Develop mechanisms for gaining insight through surveys and complaints made to the service and ensure this is used to shape and drive improvements.

3.7.2 The Council's services are prevention focused and we ensure the right advice and support is available to those who need it.

This will be achieved by

- Get upstream of homelessness, enabling earlier and more effective prevention work through the use of predictive analytics (using data to identify early risk indicators for homelessness).
- Ensure online advice and signposting information is accurate and up to date by developing a regular programme for reviewing web pages.
- Identify opportunities to support homeless households to access employment so we can better address the issue of affordability.
- Consult with central policy teams to consider the impact of Brexit and ensure officers are providing the right advice to those who may be affected.

3.7.3 Increase the supply of and access to stable and affordable homes in Brent.

This will be achieved by

- Deliver our own new build programme, providing new affordable homes across the borough.
- Create the conditions that encourage Registered Providers to develop more homes in the borough.
- Maximise the supply of stable, affordable private rented accommodation through schemes such as Capital Letters and i4B.
- Drive up conditions in the private rented sector across Brent through licensing and enforcement processes and work together with local landlords through our Landlord forum to improve standards and access to stable homes.

3.7.4 We minimise the use of temporary accommodation, but where this is unavoidable, work to improve the quality of accommodation offered and keep the stay as stable and as short as possible.

This will be achieved by

- Increase the supply of council-developed temporary accommodation so we can avoid placing households in Bed and Breakfast or other forms of nightly paid

accommodation and to eradicate the need for multi moves households endure in temporary accommodation.

- Work with our providers and partners to improve the quality of temporary accommodation offered.
- Develop opportunities for temporary accommodation residents to give regular feedback and use this to inform improvements.

3.7.5 Personalise services to individuals' needs, and work collaboratively with our partners to ensure those needs are met

This will be achieved by

- Provide additional staff training so officers feel equipped to give more tailored advice (e.g. family mediation, supporting LGBTQ individuals, sex workers, BAME households, Eastern European Rough Sleepers).
- Build on successful initiatives such as Brent Shelter of Sanctuary, working in partnership to find innovative ways to create focal points for holistic advice and support, improving health, wellbeing and access to employment.
- Consider how we can better share information across our partner organisations and our community hubs so we can deliver a more joined-up approach to providing support, ensure smooth handover of cases, and drive forward a single referral process.
- Work in partnership with our Homelessness Forum to develop a better understanding of those with complex needs and pilot an approach to supporting them more holistically.

3.8 As the Council is required to have a published strategy available on line by Winter 2019, it is proposed that the draft strategy is published for consultation on 30 September, subject to approval by PCG and the decision of the Lead Member for Housing and Welfare Reform, in consultation with the Leader, to approve and commence the consultation process. The proposed timeline set out below has been discussed with MHCLG, who have confirmed that this meets their requirements.

3.9 Informal consultation has already taken place with the Brent Homelessness Forum. This will continue after formal consultation is launched, and is a standing item on the forum's agenda. Other consultation will include publication of the review and draft strategy on the Council's portal, as well as workshops for key stakeholders.

3.10 The timetable to ensure a final strategy is published and is available on line in January, is set out below:

Date	Action
26/27 September	Decision by Lead Member to approve consultation process
30 September	Start of 8 week consultation
25 November	Consultation Ends
9 December	Deadline for Leaders Briefing Report
16 December	Leaders Briefing
2 January	Deadline for Cabinet Report
14 January	Cabinet Approval
31 January	Strategy Published

4.0 Financial Implications

- 4.1 Some financial modelling of the projected reduction in the use of temporary accommodation has already taken place. The Communities and Wellbeing (CWB) proposed Savings 2021/22 & 2022/23 include the development of council owned temporary accommodation at Knowles House and London Road, as well as the impact of Council new builds.
- 4.2 Successfully delivering a revised Homeless Strategy is likely to lead to significant financial savings, with lower demand for accommodation from external providers leading to lower costs as the council obtains greater capacity to meet demand in-house.
- 4.3 Further improvements will also be obtained through working collaboratively with other boroughs through Capital Letters. This is expected to lead to more properties becoming available for those in Temporary Accommodation, leading to a reduction in the time families spend waiting for a permanent property

5.0 Legal Implications

- 5.1 The relevant legislation relating to homelessness reviews and strategies are set out in sections 1 to 3 of the Homelessness Act 2002 (“the 2002 Act”). Further details as to what should be included in a homelessness strategy is set out in section 3 of the 2002 Act. Details as to what a homelessness review should cover is set out in section 2 of the 2002 Act and in section 2(3) of the 2002 Act, it states that the results of the Council’s homelessness review must be available for public inspection after its completion.
- 5.2 Under section 1 of the 2002 Act, local housing authorities may from time to time carry out a homelessness review for their district and formulate and publish a homelessness strategy based on the results of that review. They must ensure that a new homelessness strategy is published within five years of the date of the publishing of their last homelessness strategy.
- 5.3 As set out in section 3(7A) of the 2002 Act, in formulating or modifying a homelessness strategy, a local housing authority shall have regard to—
(a) its current allocation scheme under section 166A of the Housing Act 1996;

(b) its current tenancy strategy under section 150 of the Localism Act 2011; and (c) in the case of an authority that is a London borough council, the current London housing strategy that is prepared by the Mayor of London. The Council's allocations scheme was amended by the Cabinet in June 2019. The Council's tenancy strategy is currently being reviewed and a draft amended tenancy strategy is likely to go out to consultation later this year.

- 5.4 Section 3(8) of the 2002 Act states that before adopting or modifying a homelessness strategy, the housing authority shall consult such public or local authorities, voluntary organisations or other persons as they consider appropriate.
- 5.5 There are four principles on consultation which were established in the 1985 case of *R (ex parte Gunning) v Brent LBC* and they are set out below. In order for consultation process to be fair, a public body must ensure:
- that the consultation must be at a time when proposals are still at a formative stage;
 - that the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response;
 - that adequate time is given for consideration and response; and
 - that the product of consultation is conscientiously taken into account when finalising the decision.
- 5.6 Pursuant to clause 13 of Part 3 of Brent Council's Constitution, an individual Lead Member has authority to approve broad consultation arrangements relating to their portfolio, in consultation with the Leader. Subject to the consideration and suggestions provided by Members at the PCG meeting, officers plan to seek the authorisation of the Lead Member for Housing and Welfare Reform regarding the proposed consultation arrangements regarding the draft homelessness and rough sleeping strategy and commence the consultation process.

6.0 Equality Implications

- 6.1 As we have identified within the strategy, we are placing a renewed focus on improving the data we hold; which currently limits our ability to fully understand both the nature of the homelessness challenges in Brent, and the potential equality impact of these strategy commitments. We have plans in place to address this, both through specific data projects, and through collecting evidence from pilot initiatives such as our complex needs panel, which will inform more robust EIAs to be completed.
- 6.2 Where an initiative has already started, such as Capital Letters, an EIA has already been carried out, but in the most part, initiatives detailed within the strategy will have a project specific EIA carried out as they are being developed. This in turn will then enable us to carry out a cumulative impact assessment of the strategy as a whole

Report sign off:

Phil Porter

Strategic Director of Community Wellbeing