

Ending Rough Sleeping in Hammersmith & Fulham

Report of the Hammersmith and Fulham Rough Sleeping Commission: An Executive Summary

**Prepared for Health and Wellbeing Board Meeting
31st January 2018**

1 Background

- 1.1 Hammersmith and Fulham (H&F) Council is committed to significantly reducing the number of people in the borough rough sleeping and to preventing people from sleeping rough in the first place. The Rough Sleeping Commission was established in January 2017 to help meet this objective and to develop ground-breaking new policies with the goal of reducing the number of rough sleepers to zero.
- 1.2 The expert-led Commission was chaired by Jon Sparkes, the Chief Executive of the national homelessness charity Crisis and its membership included a range of homelessness organisations within H&F (see Appendix B for full membership details).
- 1.3 The H&F Rough Sleeping Commission set out to:
 - a) Review and identify areas of good practice in services provided to rough sleepers and those at risk of rough sleeping both in the UK and internationally;
 - b) Review H&F service provision against good practice to identify gaps in current provision;
 - c) Formulate recommendations for interventions and/or service redesign, to deliver better outcomes for people that are rough sleeping in H&F, to support those at risk of rough sleeping and to reduce the number of rough sleepers down to zero.
- 1.4 The Commission met monthly and received support from council officers and experts in the field. It's first step was to conduct a literature review to inform it's understanding of best practice approaches to tackling rough sleeping from around the world. As part of this Commission members visited a range of rough sleeping services across London.
- 1.5 In April and May, the Commission issued a call for written evidence to gather the views of external experts and to identify examples of good practice. The Commission then held a series of verbal evidence giving sessions which took place in June and took verbal evidence from key stakeholders and experts on the causes and potential solutions to rough sleeping in H&F. A key element of this phase of the work was to hear directly from people who are, or are at risk of, sleeping rough in H&F. Groundswell¹ were commissioned to enable people with experience of homelessness to contribute to the Commission and they engaged 108 people through their research.
- 1.6 A Frontline Worker session was held in June bringing together staff from projects in H&F that work with people who have experienced rough sleeping to explore the causes and solutions to homelessness. Between July and September, the Commission began to shape and formulate its recommendations from the wide range of evidence it had gathered.

¹ Groundswell is a registered charity that supports homeless and vulnerable people towards independence with client involvement at its core enabling people to have a greater influence on services by delivering innovative projects which put homeless people at the heart of solutions.

2 Evidence

- 2.1 Rough sleeping is defined by the Government as ‘people sleeping, or bedded down, in the open air (such as on the streets, or in doorways, parks or bus shelters); people in buildings or other places not designed for habitation (such as barns, sheds, car parks, cars, derelict boats, stations, or ‘bashes’)’.
- 2.2 In 2016/17, 246 people were seen sleeping rough in the borough², representing an overall increase of 2% on the previous year. A similar trend was seen across London boroughs over the period. Sixty-one per cent (151) of people seen by outreach teams were new to rough sleeping and were not seen prior to 2016/17. Twenty-eight per cent (68) were also seen sleeping rough in 2015/16. Eleven per cent (27) had previously slept rough, and had now returned to the streets (returners).³ This indicates that if there had been an intervention in place, it may have broken down.
- 2.3 81% (123) of people who were new to the streets did not sleep rough for a second night and this can likely be linked to the success of the No Second Night Out (NSNO) project. However, people are still missed including those worried that contact with NSNO will mean a reconnection back to their originating country.
- 2.4 There has been an increase of new rough sleepers in H&F choosing to leave short to medium-term accommodation as well as an increase in the numbers of rough sleepers who have been asked to leave or have been evicted. There is a general trend across London and England showing that the leading cause of homelessness is the ending of an Assured Shorthold Tenancy (AST) in the private rented sector. In England, the ending of an AST accounts for 74% of the growth in households who qualify for temporary accommodation since 2009/10.⁴ This indicates that affordability is an increasingly significant issue as more households facing the end of a private tenancy are unable to find alternative accommodation without assistance. Since 2010, the cost of accommodation in the PRS has risen three times faster than earnings across England. In London, the increase was eight times higher.
- 2.5 In the past year there has also been a rise in the number of UK nationals and a decrease in the number of Central and Eastern European nationals rough sleeping. The Commission considered changes to Home Office policy on EEA removals and UK net migration targets as contributing factors to these changes.

3 Findings and Recommendations

- 3.1 The Commission generated a wide range of evidence in relation to rough sleeping in H&F as well as 30 recommendations (Appendix A) on how to

² CHAIN Annual Report Hammersmith & Fulham, April 2016 – March 2017.

³ The flow, stock and returner model categorises people seen rough sleeping in the year according to whether they have also been seen rough sleeping in previous periods.

⁴DCLG (2017) Statutory Homelessness and Prevention and Relief Statistical Release, January to March 2017.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/621556/Statutory_Homelessness_and_Prevention_and_Relief_Statistical_Release_January_to_March_2017_corrected.pdf

reduce the numbers rough sleeping to zero. The Commission's recommendations are directed towards organisations operating at the local, regional and national levels.

- 3.2 Peer researchers from Groundswell engaged with 108 people who were homeless at the time or who had slept rough in H&F in the past. The rough sleepers they spoke with told them that none of them wanted to sleep rough and only a very small number of those interviewed (2 of 108) wanted to live in a hostel. What they overwhelmingly said they needed to stop sleeping rough was stable and affordable homes. Rough sleepers also told Groundswell that cutbacks in funding to services and higher thresholds for support meant they were no longer getting services that meet needs. Cut backs to wider support services such as counselling, debt/money management advice and drug and alcohol services were also having an impact. Rough sleepers talked about the importance of day centres for getting food, a shower or charging their phones but that cut backs to day centre opening hours made accessing these vital services difficult and particularly problematic for people with complex needs.
- 3.3 Rough sleepers spoke about the role of the welfare system in triggering and perpetuating homelessness. The six-week assessment process and seven day waiting period for Universal Credit combined with delays made it difficult to maintain rent and bill payments and were the cause of many tenants' arrears. The capping and freezing of Local Housing Allowance (LHA) rates – used to calculate housing benefit entitlements – was also making it difficult to find and sustain affordable accommodation in the borough. The Valuation Office Agency calculations for 2016/17 show that for the broad rental market area of Inner West London, there is a shortfall of £32 for one room, £178 for one bed, £160 for two bed, £333 for three bed and £786 for four bed properties.
- 3.4 The Commission's research also raised issues around a variety of areas including the affordability, security and condition of accommodation in the private rented sector (PRS) and the lack of move-on options available in hostels. It found proving a local connection to the borough to be a significant barrier to accessing statutory and non-statutory homelessness services and found significant numbers of EEA nationals and people with no recourse to public funds utilising emergency winter shelters. In these latter cases, people required urgent immigration advice to resolve their status and move out of destitution. The frontline worker sessions found there was generally a lack of support for asylum seekers, EEA nationals and people with insecure immigration status.
- 3.5 The Groundswell research also found that there were often many missed opportunities to intervene and prevent people who were at risk of rough sleeping from becoming rough sleepers. For instance, 66% of people interviewed had been in touch with Housing Options and many had come into contact with hospitals, GPs and probation services before they slept rough.
- 3.6 The Commission's recommendations are grouped around four themes. Firstly, they (1) advocate a strong prevention framework to prevent people sleeping rough happening in the first place; (2) argue for a strong emergency response

when people do find themselves sleeping rough; (3) argue for housing led approaches (such as Housing First) that settle people quickly into long-term accommodation with access to support; and (4) recommend that the responsible authorities ensure there is adequate supply of affordable housing for rough sleepers and those at risk of rough sleeping.

Appendix A: Recommendations

Section	Recommendations	For action by
<p>1) Implement a stronger prevention framework across organisations in H&F</p>	<p>1) Ensure that everyone at risk of sleeping rough is accommodated by adopting a No First Night Out approach. Based on the evidence taken from the No First Night Out project in the London Boroughs of Hackney, Tower Hamlets & the City of London Corporation, the Commission recommends that H&F implement a similar approach based on research about the routes into homelessness for various cohorts. The overall aim of this approach should be to ensure that anyone at risk of sleeping rough is provided with some form of temporary accommodation, and no one in this situation is turned away by the local authority without having their homelessness resolved. As well as those at risk of sleeping rough, this offer should be made to people already rough sleeping. To support the delivery of this approach, H&F should invest in training for frontline housing and homelessness teams to ensure that they are applying a personalised and creative approach to tackling homelessness.</p> <p>2) Involve the public in tackling rough sleeping. There are numerous places that people go when they are sleeping rough or are at risk of sleeping rough, but where they are not currently able to access housing advice. These might include places of worship, libraries and GP practices. The Council may wish to hold a ‘Rough Sleeping Hackathon’ involving community and voluntary organisations to engage the public around raising awareness of rough sleeping and involving them in generating and implementing solutions. This would also help ensure these organisations and individuals across the borough are better able to sign post people to the appropriate advice and services. The H&F Homelessness Forum could be used as the vehicle to engage the community, voluntary and faith sector.</p> <p>3) Ensure no one sleeps rough when they leave prison by working jointly with local prisons and probation teams to review existing referral systems and processes. In the</p>	<p>The Council</p>

	<p>run up to the introduction of the Homelessness Reduction Act, H&F should look specifically at how prisoners are identified as having a housing need and how they are referred to the prison housing teams well in advance of their release date.</p> <p>4) Provide urgent support to private tenants who are at risk of sleeping rough. H&F should ensure that tenants who are renting privately and deemed at risk of rough sleeping or losing their home can easily access Discretionary Housing Payments (DHPs), whether this be through targeted promotion to tenants and landlords or through the SLA. There has been a significant increase in PRS rents, which is leaving a shortfall that cannot be met by any other intervention. H&F should review internal processes to ensure that anyone approaching the Council who is facing financial difficulty, regardless of which team they approach (e.g. Housing Benefit, Housing Options or council tax), should be assisted to make an application for a DHP if they are at risk of, or have already accrued, rent arrears.</p> <p>5) Ensure that people are not made homeless as a result of being evicted from social housing. H&F should carry out a full review of housing association and council eviction policies to ensure accommodation is not lost. H&F should work with housing providers in the borough to put in place effective early notification and response arrangements where housing association tenants are at risk of tenancy failure and to ensure that a joint landlord/Housing Options approach is adopted to working with the tenant to prevent homelessness. This might include referral to routine multi-agency panel meetings to review cases and develop person-centred plans to prevent homelessness in individual cases.</p>	
	<p>6) The GLA should put in place a pan-London approach to protect people who are homeless from having their benefits sanctioned. The GLA should help coordinate the DWP, local Jobcentre Plus (JCPs) and London local authorities to work together to offer protection from sanctioning for people rough sleeping or at immediate risk of homelessness. There must be a contactable link within the DWP who has the power to halt or change a</p>	<p>The GLA and regional bodies</p>

	<p>sanctioning decision and a process whereby the local authority is notified prior to sanctioning to check someone's current housing and welfare status. The effect of sanctioning has been identified as both a cause and contributory factor of homelessness.</p> <p>7) The GLA should ensure that sufficient help is put in place for people moving onto Universal Credit. As Universal Credit is rolled out across London, the GLA should help facilitate the work between London local authorities and JCPs to ensure that vulnerable groups are properly supported to move onto Universal Credit. This work should focus specifically on ensuring that JCPs are well connected to local housing and homelessness teams and flagged as quickly as possible if there is any risk of homelessness so that the appropriate support package is put in place.</p> <p>8) The GLA should ensure that everyone at risk of sleeping rough is accommodated by supporting all London local authorities to adopt a No First Night Out approach. A pan London adoption of this approach will help to ensure that no one council is overburdened by high demand.</p>	
	<p>9) The Government should increase the level of funding needed to successfully implement the Homelessness Reduction Act. The current level of funding is not sufficient for the local authority to meet the increased level of demand. H&F estimates that the financial impact of the Homelessness Reduction Act implementation will result in an increase of demand and workload of at least 50%.</p> <p>10) The DWP needs to work better with JCPs to ensure that they have better training, and understanding of, homelessness and housing related matters and the consequences of sanctioning someone who is homeless. Training for work coaches on housing issues should be integral in this awareness raising.</p>	HM Government

	<p>11) The MoJ should obligate prison Governors to introduce integrated transition plans for all prisoners and introduce measurable housing outcomes for Community Rehabilitation Companies (CRCs). This will ensure that prisoners are fully supported upon their release from prison.</p>	
<p>2) Emergency response</p>	<p>12) Enable and empower the voluntary sector to organise and design day services around the experience of people who sleep rough. H&F should take a greater role in working with the voluntary sector to help better coordinate the provision of day services for people sleeping rough to ensure that the complexity of need is sufficiently met. Crucially the design and coordination of services should be centred around the experience of rough sleepers, particularly with regards to opening times and the nature of the support provided.</p> <p>13) Ensure that there are a sufficient number of outreach workers and that they are empowered to support people off the street immediately. H&F should commission a greater number of outreach staff and ensure that they are sufficiently empowered to support people who are sleeping rough off the streets, even if they do not necessarily qualify for a NSNO offer. Future specification for the commission of outreach teams should ensure that health, drug and alcohol services are commissioned and funded to dovetail with outreach provision. These outreach teams should not only be commissioned to deliver services for people who are new to the streets, but also to undertake potentially more intensive work with people who have entrenched needs. Mental health and substance misuse trained outreach workers should be specifically commissioned to provide emergency specialist support on the streets. Improved partnership working with the H&F Clinical Commissioning Group should lead to better health outcomes for rough sleepers. As will ensuring that rough sleeping is considered by the Health & Wellbeing Board.</p> <p>14) Provide more legal advice for people who are, or are at risk of, sleeping rough. H&F should extend the commission of Street Legal within H&F. The service provides specialist</p>	<p>The Council</p>

	<p>legal advice for people with NRPF to regularise their status and get them the right help and support alongside the provision of emergency bed spaces.</p> <p>15) Make sure that people who cannot access hostels have somewhere safe to stay. H&F should assess the need for, and design a ‘crash pad’ service targeted at people who struggle to access hostel accommodation. This should be designed to include people who have limited or NRPF, people who struggle to prove that they have a local connection to H&F, and those who have been barred from the hostel system (e.g. due to rent arrears or antisocial behaviour). The crash pads should be designed to provide people with a safe space where they can access support services and move into hostels or permanent accommodation. H&F should also work with faith based and other community based organisations to help increase the availability of open-access provision so nobody is forced to spend nights sleeping rough</p>	
	<p>16) Government should suspend the removal of EEA migrant rough sleepers to their country of origin until there has been a full review of Home Office Guidance on EEA administrative removal <i>regulation</i>. Without greater transparency on this policy, there is no way of establishing the consequences of the removal on the individual.</p>	HM Government
3) Housing First and Housing-Led Approaches	<p>17) Adopt a housing-led approach for people at risk of rough sleeping and people living in hostels, including a Housing First offer for people with multiple and complex needs. H&F should implement a Housing First approach for rough sleepers, people at risk of rough sleeping and people living in hostels, who have multiple and complex needs as the default option to ending their homelessness. We estimate that 68% of all rough sleepers, based on CHAIN data, have high and/ or multiple complex needs and would be eligible for a Housing First offer.</p> <p>Based on the Homeless Link report, the current scope of Housing First projects house 10-20% of their rough sleeping cohort. Based on this, the Council should aspire to set up at</p>	The Council

least 15-20 placements (estimate) and set targets for the implementation of Housing First by default.

The Commission took evidence from H&F's Looked After Children's service and found an excellent model of best practice with regards to an unconditional and open-ended model of support provided to care leavers. Out of a cohort of 185 there were no Looked After Children (LAC) or care leavers experiencing homelessness. The Commission recommends that the council should adopt a similar support model for Housing First.

The Council should conduct a feasibility study similar to that in the Liverpool City Region to assess the longer-term savings against the roll out cost and the implementation of Housing First for people with complex needs and a housing led approach for people with lower support needs.

There is likely to be a two-year period of 'double running' of services. Thereafter the Council can look to decommission a proportion of hostel services and invest this funding into Housing First in year three and four. The Commission recommends that hostel provision should only be commissioned as emergency provision with a focus on move-on.

18) **Ensure that homes are made available in the private and social rented sector for people who are made a Housing First offer.** H&F should explore the use of the PRS using the H&F SLA to secure accommodation for Housing First clients. It has been demonstrated that the PRS can help to successfully deliver Housing First, relieving pressure on social rented stock and housing people more quickly.

19) **Ensure that health structures within the local authority are involved in commissioning Housing First.** Housing First is not only a solution to rough sleeping and homelessness, but also addresses a range of other support needs including mental health and substance misuse. The Commission therefore recommends that services are not purely commissioned and funded by H&F housing and homelessness teams, but in collaboration with Health and Wellbeing Boards and Clinical Commissioning Groups.

	<p>20) Implement a housing led approach to move people with lower support needs out of hostels and into settled housing as quickly as possible. H&F should ensure that move on plans from hostels aim to make it easier and faster for someone to ultimately move into independent living. These are currently completed on individual needs basis and constantly reviewed. There is no minimum or maximum time limit. With housing led approaches, whilst someone might not need an intense package of support they might require some tenancy support. This could be done through the SLA.</p> <p>21) Engage homeless people and people with experience of homelessness in commissioning and delivering services. The Commission recognises the value added by peer-mentoring to homelessness services. It is therefore recommended that H&F include a requirement to provide a peer mentoring service in homelessness services, including Housing First. Involving (including employing) more people with experience of homelessness will provide a vital opportunity for people that have used services to give something back and support the rough sleeper to navigate the avenues of support available.</p>	
	<p>22) The Government should provide additional funding at a realistic level for Housing First implementation. This will allow for a smooth transition from a hostel based system to a housing led approach so there is no drop off in services. Over the period of scaling up Housing First provision there will be double running costs until the council begins to decommission some bed spaces in hostels.</p> <p>23) The NHS and Public Health England should allocate budgets on a pan-London basis for homelessness interventions, including Housing First and housing led services. The NHS is a major point of contact for rough sleepers. Housing First is not just about tenancy sustainment but also focuses on tackling drug, alcohol and mental health issues.</p>	HM Government
4) Ensuring access and	24) Ensure that rough sleepers are not unfairly blocked from accessing social housing. H&F needs to negotiate with / apply pressure on housing associations (Registered	The Council

<p>adequate supply of secure and affordable housing for rough sleepers and those at immediate risk of rough sleeping</p>	<p>Providers) to review and change their allocations policies to make sure that rough sleepers are not unfairly excluded, for example, because of time spent in prison or previous financial difficulty.</p> <p>25) Make sure social housing is provided for people who are made a Housing First offer. H&F should ring fence a portion of social housing for people who have slept rough, including those made a Housing First offer so it is readily available once a client has been identified and assessed. Based on the estimated number of Housing First placements, approximately ten could be ring-fenced for Housing First by the Council from its stock. The rest could be sourced from housing associations and private rented stock via the SLA.</p> <p>26) Provide shared accommodation solutions for young adults. H&F should seek to increase the supply of affordable shared accommodation for under 35s. This could be achieved by converting existing properties or building new shared accommodation. The extension of the SAR has had a negative impact on the affordability of accommodation for people under the age of 35 and in turn accessibility of the PRS. If a rough sleeper is under 35 and is not exempt from the rule, they are not entitled to claim the benefit rate for one-bedroom self-contained accommodation.</p> <p>27) Make sure that regeneration and development provides more housing solutions for homeless people. H&F should, where possible, ringfence a portion of housing development as part of regeneration and planning initiatives (e.g. the new Hammersmith Town Hall development) specifically for the provision of stock for Housing First and housing led tenancies. The Council should explore how Section 106 could be used most effectively to deliver homes at social rents specifically for the provision of housing units for rough sleepers and people who have experience of, or are at risk of, homelessness.</p>	
	<p>28) The Government should undertake a review of Local Housing Allowance (LHA) rates</p>	<p>HM</p>

	<p>to reduce the gap between Housing Benefit and affordable (market) rents to improve access to homes.</p> <p>29) The Government should reassess the Housing and Planning Act 2016's impact on social housing. Evidence taken indicates that currently national policy is undermining the supply of social housing.</p> <p>30) The Government should increase the grant for social house building. The Housing and Planning Act 2016 widens the definition of 'affordable housing' to include Starter Homes, which is likely to be prioritised above genuinely affordable homes such as social housing and other forms of low cost housing. As a result, the policy will lead to a further decline of genuinely affordable housing for people who have experienced, or are at risk of, homelessness.</p>	Government
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Appendix B: The Rough Sleeping Commission

Membership

- Michael Angus, Director, Barons Court Project
- Michael Buraimoh, Operations Director, The Upper Room
- Steven Platts, Senior Project Manager, Glass Door
- Thomas Neumark, Chief Executive, The Peel Institute
- Paul Doe, Chief Executive, Shepherd's Bush Housing Group⁵

Terms of Reference

- Identify the scale and nature of rough sleeping in H&F using available data and intelligence.
- Conduct a review of the available literature on rough sleeping, drawing on studies and commissions from elsewhere in London and the UK, and, where directly relevant, internationally.
- Call for written evidence from leading experts, policy makers and practitioners and explore this through a series of thematic oral hearings.
- Call for evidence from local third sector, council funded and independent service providers including those providing services to those at risk of rough sleeping.
- Obtain evidence from residents who have interacted with the Council's current rough sleeping services and who are part of the Housing First pilot.
- Identify key principles on which to base services for rough sleepers and those at risk of rough sleeping.
- Make recommendations to the Council on how best to support rough sleepers and prevent those at risk of becoming rough sleepers.
- Propose interventions and potentially service redesign for implementation locally, or more widely, that will help people that are rough sleeping.

⁵ (*Matt Campion, joined the Commission in June 2017 as a representative of the SBHG in place of Paul Doe who retired from this position).