**Submission from Depaul UK – Tackling homelessness together consultation**

**May 2019**

**About Depaul UK**

Depaul UK works in some of the UK's most disadvantaged communities, preventing homelessness and providing support to vulnerable young people. Last year we provided services including emergency accommodation, longer-term housing and community outreach to almost 4,000 young people. Our Nightstop network operates across the UK and we deliver many other services across London, the North East, Greater Manchester and South Yorkshire.

**Summary of recommendations**

* **Homelessness Reduction Boards should be established through legislation. They should aim to create more strategic joint work focused on prevention, involving pooled budgets and with scope for voluntary agencies to provide strategic input. They should also aim to hold providers and commissioners to account and be based on robust data.**
* **Social Impact Bonds also encourage strategic, multi-agency planning and their payment arrangements hold providers to account. They should be introduced in more local authority areas.**
* **Central Government should ensure that local authorities and other commissioners have sufficient resources to commission effective homelessness services.**

**Answers to questions**

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

Depaul UK works in a number of local authority areas across London, the North East, Greater Manchester and South Yorkshire. We are involved in homelessness forums in many of these areas. Homelessness forums bring together non-statutory providers of homelessness services. They are often convened by local authorities. Local authorities often also set the agendas for meetings.

We are also part of the London Youth Gateway (LYG).[[1]](#footnote-1) The LYG is coalition of voluntary sector organisations delivering a London Councils youth homelessness contract worth over £1 million across the capital. The LYG relies on voluntary organisations making an on-going strategic commitment to agree and deliver joint actions, hold each other to account and develop responses to new challenges.

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

In Depaul UK’s experience homelessness forums vary in their effectiveness. They can encourage joint working, avoid duplication, hold providers and commissioners to account, help new providers to connect with existing services, enable emerging issues to be discussed and facilitate a focus on specific subgroups.

They can also be poorly attended and sometimes appear to be ‘talking shops’ without having significant impact. Some forum meetings consist of local authorities presenting information with little time for meaningful discussion

The LYG is effective. Joint working takes place, in part because providers could not deliver the contract without working closely together. Members generally agree and deliver joint actions, hold each other to account and develop responses to new challenges.

**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?**

Homelessness forums can support the reduction of homelessness and hold partners to account. They are perhaps less able to drive systems change, forums that we are involved with do not seem to have the power to do this. They are often focused on making existing systems work better.

The LYG also supports the reduction of homelessness and holds partners to account. It facilitates systems change in that it depends on cross-local authority working whereas homelessness services are generally orientated around a single local authority. It also gives voluntary sector agencies more responsibility for holding each other to account and more flexibility around how they meet objectives.

**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?**

We have strategic and operational interactions our local authority commissioners. This is because they fund most of the services we deliver, specifying objectives through the tendering process and monitor performance through contract management.

As a charity specialising in youth homelessness we also interact with local authority children’s services. Children’s services are involved in commissioning many of our services, some of which have specific objectives around housing and supporting care leavers.

Depaul UK also delivers Social Impact Bonds (SIBs). Local authorities sit on the boards of these SIBs. SIBs give providers greater strategic input and operational flexibility than more conventionally commissioned services.

We have operational interactions with local authority housing options teams, especially when we believe young people we are working with may be owed a housing duty.

People using our services often face non-housing as well as housing issues. Most have mental health problems; many have substance use and offending issues and some have issues over their immigration status. Young people we work with are also often not in education, training or employment. We therefore interact with public health commissioned substance use teams, Home Office Immigration teams, mental health services, GPs, Jobcentre Plus, colleges, the police and probation.

**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?**

There is greater scope for strategic conversations about reducing homelessness between public health commissioned substance use teams, Home Office Immigration teams, statutory mental health services, GPs, hospitals, Jobcentre Plus, colleges, the police and probation. These organisations already often interact with each other around homelessness at the operational level.

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

There is greater scope for strategic work with the organisations listed in our answer to question five. There should be more joint strategic work focused on prevention, involving pooled budgets and scope for voluntary agencies to provide strategic input. Our current work with statutory bodies is often operational, focusing on individuals for whom a risk has been identified or who are experiencing harm or problems that require a service response. A strong focus on prevention and pooled budgets would encourage commitment from other agencies and work to address the causes of homelessness rather than its consequences.

SIBs also encourage strategic, multi-agency planning and should be introduced in more local authority areas. SIBs can be based around housing and non-housing outcomes that impact on homelessness, including improved health and mental health, reduced offending and accessing employment, training and education. Economies of scale, as well as their inherent need for robust data collection and administration, means that it may be more effective for individual SIBs to cover multiple local authority areas.

**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? N/A**

**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. N/A**

**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?**

Homelessness Reduction Boards, as set out in this consultation, seem in many ways similar to Health and Wellbeing Boards (HWBs). If homelessness reduction duties are added to the remit of HWBs there is a risk that HWBs may see homelessness as a second order issue to health, and therefore not devote sufficient time or resources to tackling homelessness. Health budgets are far larger and health issues affect a far higher proportion of the local population, health could be seen as a more important priority.

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

Depaul UK believes that Homelessness Reduction Boards should be introduced. As our answers to other questions show, efforts to reduce homelessness would be supported by more strategic joint working between agencies. Homelessness Reduction Boards could also enable commissioners, providers and to hold each other to account.

Potential drawbacks could be that Homelessness Reduction take up time that could be better spent serving local populations in other ways, or that they are ineffective. Government could develop an approach that mitigates against these risks by continuing to consult with statutory and non-statutory commissioners and providers before introducing them.

**If we were to establish Homelessness Reduction Boards:**

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

Homelessness Reduction Boards should support more strategic joint working between agencies. They could also enable commissioners, providers and to better hold each other to account.

**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)?**

Depaul UK’s experience is primarily in unitary authorities. Unitary authorities should have the freedom to come together to form sub-regional Homelessness Reduction Boards if they so wish. These could be based on areas covered by devolved authorities.

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

There is greater scope for strategic conversations about reducing homelessness between public health commissioned substance use teams, Home Office Immigration teams, statutory mental health services, GPs, hospitals, Jobcentre Plus, colleges, the police and probation. These organisations already interact with each other around homelessness at the operational level and, to varying extents in different areas, could contribute to the strategic work of Homelessness Reduction Boards.

Considering the statutory agencies subject to the duty to refer in the Homelessness Reduction Act may be a reasonable starting point for deciding who should attend Homelessness Reduction Boards.

Homelessness Reduction Boards should be chaired by an independent figure who does not work for the local authority or a local provider. This would help to ensure that they are able to hold local authorities and providers to account.

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

Depaul UK believes that Homelessness Reduction Boards should be given a statutory footing. In our experience local authorities’ response to homelessness is driven by legislation, i.e. the Homelessness Reduction Act (2017) and Housing Act (1996). Local authorities may not prioritise contributing to the work of Homelessness Reduction Boards if they do not have a duty to do so.

Homelessness Reduction Boards as proposed in this consultation appear to be in many ways similar to Health and Wellbeing Boards (HWBs), which were introduced by the Health and Social Care Act (2012). Their duty to contribute to a joint strategic needs assessment and a joint health and wellbeing strategy may well make them more effective than would be the case if they did not have this duty.

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

Statutory agencies’ commissioning of providers to deliver services agencies is a crucial aspect of partnership working. The effectiveness of commissioning is currently uneven across the local areas we work in. At its best commissioning is based on robust data about need, includes providers and service users from the outset and fosters a positive relationship between commissioners and providers.

We also have experience of commissioning that is chaotic, e.g. does not keep to timescales or is not properly executed and therefore has to be repeated. Some tenders are for contracts that offer insufficient funding for the stated objectives, leading to few or even no providers bidding for them.

This underfunding of contracts and procedural problems with commissioning homelessness service is in no small part due to limited funding that many local authorities have available. Central Government should ensure that local authorities and other commissioners have sufficient resources to commission effective homelessness services.

Commissioning based on competitive tendering can make providers less willing to share information or good practice, as doing so could lead them to lose out to competitors. The LYG (see our answer to questions one, two and three) is based on a coalition of charities working together. More funding of coalitions to deliver homelessness services could encourage greater partnership working.

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

Areas with more effective partnership working usually have well attended homelessness forums, in part because local authorities set a clear expectation that commissioned providers should attend. Competitive tendering can limit partnership working between providers, so longer contracts, which mean fewer rounds of competitive tendering, can also encourage more partnership working. See our answers to questions one to six for more information on effective partnership working.

**Combined answer to:**

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

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

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

Data on homelessness is often poor or underutilised in planning and delivery of services. SIBs are an exception as payments are based on outcomes, which can only be demonstrated through robust gathering, analysis and sharing of data. Considerable data analysis is also necessary to ensure that SIB outcome payments structure programmes in a way that is achievable, challenging for providers and can generate appropriate financial returns for investors.

Shared databases are an effective way to collect large amounts of data. Sheffield has a shared database that homelessness service providers input into. The CHAIN rough sleeping database covering Greater London enables effective service delivery, design, joint working and research that would not be possible without CHAIN.

Many homelessness service providers use Inform, a client information system based on Salesforce and developed by Homeless Link. Although organisations adapt Inform to their own needs, there may be potential for amalgamation of Inform data held across different providers.

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

N/A

1. For more details see http://www.londonyouthgateway.org.uk/ [↑](#footnote-ref-1)