



Homelessness Review 2018 Final Report

Swale Borough Council

NOVEMBER 2018

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Executive summary

The background

HQN was commissioned by Swale Borough Council to carry out an independent Homelessness Review and develop a new Housing, Homelessness and Rough Sleeping Strategy for the borough. The review was undertaken during October and November 2018 by HQN associates – Trish Reed and Jo Barrett who are both specialists in homelessness. Their activities included a desktop review of statistical information, consultation with officers and engagement with partners and key stakeholders. The review focussed on the homelessness service provided by Swale Borough Council and links to other support services.

The review of homelessness in Swale found that the Council is challenged by the current housing market, with significant demand predominately coming from households under 45 years of age. This group is increasingly unable to access either owned or rented housing in the private sector due to high market values and the lack of affordable housing, even for working households. Local Housing Allowance rates across the borough set at significantly below the market rent levels mean that private rented housing is not an option for many low income households.

Pressures on the service have resulted from an increasing number of households presenting to the Council as homeless and being owed a statutory homeless duty. This has led to an increase in the number of households being accommodated in temporary accommodation, and resulted in increased costs to the Council.

The two main causes of homelessness in Swale are parental eviction and loss of privately rented tenancies. These two reasons account for 50% of homeless acceptances. Numbers are likely to continue to increase and a pro-active approach to homelessness prevention is required in order to address this.

The Homelessness Prevention Act 2017 came into force in April 2018 and brought with it increased prevention duties for local housing authorities, who are now required to take a much more pro-active approach to prevention, and to work with partners to deliver advice and support to people at an earlier stage.

Key findings

Homelessness prevention

- The front-line Housing Options service would benefit from a much stronger customer focus. More can be done to develop a culture within the team of an open and pro-active service, making advice readily available at all customer access points and out in the community, allowing officers to develop specialist roles and lead on these for the team
- Although the demand for affordable housing continues to rise, new supply is limited and officers need to be supported to challenge the public perception that social housing will be provided for anyone who approaches the Council. Social housing is a scarce resource and homelessness prevention initiatives and alternative housing solutions in the private rented sector will be actively sought. Further publicity is required detailing the homeless prevention offer
- Officers are currently office-based dealing with customers predominately via a telephone appointment system. A more pro-active approach should be adopted, developing a comprehensive prevention policy and procedures in line with the National Gold Standard approach, including home visits, outreach surgeries, mediation, tenancy relations, financial support, etc
- The Allocations Policy sets restrictive local connection criteria for the Housing Register and does not give sufficient priority to homeless households. The Allocations Policy should be amended to reduce the length of local connection required and increase the priority awarded to homeless households in order to bring down numbers in temporary accommodation.

Working with partners

- There has been good progress with developing new initiatives, specifically the Landlord Introduction Scheme with officers working much more closely with, and providing support for both private landlords and tenants. This scheme is starting to deliver results albeit slowly and should be expanded
- Operationally partnerships are good but more could be done to work with partners at a strategic level to build relationships and develop a shared approach to homeless prevention. This could be achieved through holding regular Homelessness Forum meetings
- Protocols and partnerships with Social Housing Providers in the borough would benefit from review and updating, exploring opportunities for delivering new housing supply and encouraging sign up to the Commitment to Refer to support early identification of those at risk of homelessness.

Support for vulnerable people

- Supported housing funded by the County Council is generally meeting the need of vulnerable households in the borough, with single people in particular benefiting from the single homeless supported housing provision available. However, proposals to remodel this provision are being discussed and will need to be informed by pro-active local engagement
- The number of rough sleepers is increasing and steps should be taken to agree more formal arrangements during periods of severe weather than the use of bed and breakfast. The relationship with both local voluntary sector organisations and faith groups could be developed to support this work
- While it is unlikely that any additional supported housing will be commissioned there is a need to monitor support for both young people and people with complex needs who may 'fall through the net' in future. A pro-active approach to early identification and prevention will support this, including promoting work in schools to educate young people about the realities of leaving home.

Temporary accommodation

- There is a mixed portfolio of temporary accommodation and while this is used effectively, bed and breakfast is still used on a regular basis. Ending the use of B&B and significantly reducing the number of nightly let properties should be a priority especially those that are out of area
- Optivo is a key partner providing hostel and self-contained temporary accommodation. Care should be taken not to increase the number of properties taken 'out of stock' for use as temporary accommodation as this reduces the ability to permanently house people and reduce overall numbers
- The Council's recovery plan is starting to see results but is a short-term fix to a long-term problem and while Optivo is willing to help in the short term, long term solutions including a review of the current Allocations Policy will be key to addressing this issue
- Investment in 'up-stream' advice and prevention will in the long term deliver savings on the cost of providing temporary accommodation. Adopting a spend to save approach to delivering prevention services, promoting partnership working to tackle homelessness and delivering new housing supply will all contribute significantly to achieving savings for the council in future.

Conclusions and priorities

In conclusion, pressure on the Housing Options Service continues to present challenges especially in terms of managing customer demand, balancing prevention activity and the requirement to deal with the needs of those owed a statutory duty.

The Homelessness Review has identified some good practice across the housing service and some areas for improvement. The following will be key priorities to take forward into the Housing, Homelessness and Rough Sleeping Strategy:

- Promote early intervention and a more customer focussed homelessness prevention service
- Develop strategic partnerships to address homelessness and rough sleeping in the borough
- Ensure support is available for vulnerable households.
- Reduce the number of households in temporary accommodation.

1. Introduction

The Council published a Homelessness Strategy in 2008 and again in 2014 providing a plan for tackling homelessness in the borough. With the introduction of the Homelessness Reduction Act 2017 and new duties to prevent and relieve homelessness, the 2014 Homelessness Strategy needs to be reviewed and a new action plan put in place for the forthcoming five years.

In order to develop a new Housing, Homelessness and Rough Sleeping Strategy HQN was commissioned to carry out a review of homelessness in the borough, taking into account the requirements of the Homelessness Act 2002, the Homelessness Reduction Act 2017, and the new Homelessness Code of Guidance. The review covered the following key areas:

- The levels, and likely future levels of homelessness
- A review of activities to prevent homelessness
- The needs of vulnerable groups
- A review of temporary accommodation
- Housing options to relieve homelessness
- Housing Register and Allocations Policy
- Implementation of the Homelessness Reduction Act 2017
- Existing and new housing supply

- Staff structure and resources.

The review was undertaken during October and November 2018 by HQN associates – Trish Reed and Jo Barrett who are both specialists in homelessness. Their activities included a desktop review of statistical information, consultation with officers and engagement with partners and key stakeholders. The review focussed on the homelessness service provided by Swale Borough Council and links to other support services.

This report sets out the findings of the review which will provide the basis for formulating the Council's new Housing, Homelessness and Rough Sleeping Strategy 2019-23 and accompanying Delivery Plan.

2. Homelessness in Swale

2.1. The Swale Borough

Swale is located on the County's north coast between Medway, Maidstone and Canterbury, around 45 miles from London. It includes the towns of Sittingbourne, Faversham and Sheerness, as well as an extensive rural hinterland which takes in the whole of the Isle of Sheppey and part of the Kent Downs.

The mid 2017 estimates, based on the 2011 Census suggest there are 146,700 people living in Swale with the population due to increase by almost 20% to 175,400 by 2036. At the time of the Census there were 55,585 households living in Swale. Of those, 31.4% are owner-occupiers without a mortgage, 37.9% are owner-occupiers with a mortgage, 14.3% are resident in the affordable housing for rent sector (being social rented housing or affordable rented housing), and 15.2% of households in Swale live in private rented accommodation.

There is considerable variation within the Borough, with affluent and up-and-coming areas sitting alongside some of the most deprived neighbourhoods in the country. While there is wealth and prosperity, Swale still encompasses some pockets of entrenched poverty and disadvantage. According to the Index of Multiple Deprivation 2015, Swale is ranked second most deprived borough within Kent, out of 12, and 77th most deprived of the 326 districts in the Country.

One of the legacies of Swale's industrial past is the 'skills gap', with a higher than average proportion of residents having insufficient skills to be competitive in the modern work-place and fewer than average highly qualified professionals. This relative lack of professional jobs and marketable skills means that unemployment remains higher than the regional average and salaries are lower. The median weekly full-time earnings of employees living in Swale were £566 (£29.5k pa) in 2017. Statistics also suggest that the health outcomes and life expectancy of people in Swale is below the national average.

Following the national trend and across all of the South East there has been a long-term worsening in affordability of accommodation, which is particularly pronounced in the Swale

borough. The housing market in Swale shows an east/west split. In the east (Faversham) house prices are similar to Canterbury. In the west (Sittingbourne) they are similar to Medway. Housing on the Isle of Sheppey can be significantly cheaper with a market distinct from either Sittingbourne or nearby Medway and with the lowest house prices in the borough.

Average house prices in Swale vary between £183,996 for a flat to £387,188 for a detached property, slightly lower than for the Kent or the South East. Median house prices in 2017 were 9.18 times median incomes. Lower quartile house prices in 2017 were 9.3 times lower quartile incomes so people on the lowest incomes face the biggest struggle to access housing that is suitable for their needs.¹

There is a gap between the cost of rents and the Local Housing Allowance. This gap ranges from £14.60 for a one-bedroom flat in Faversham (Rent £138.46, LHA rate £123.86) to £124 per week for a four-bedroom house in Sittingbourne (Rent £319.34, LHA rate £198.11) making accessing privately rented housing extremely difficult for people on low incomes or reliant on benefits.

2.2. Current levels of homelessness

2.2.1. Homelessness acceptances

Over the last three years the homelessness caseload has fluctuated, but on average about 450 decisions are issued per year. Whilst the number of applications has not changed significantly, the number of homeless acceptances has increased by 50%. This is reflective of the depleted private rented sector, increasing private rent levels and static Local Housing Allowance levels.

Table one: Homeless accepted households

Homeless accepted households	2015/16	2016/17	2017/18
Total decisions made (caseload)	418	514	441
Accepted	112	163	168
% accepted	27%	32%	38%

2.2.2. Reasons for homelessness

The two main causes of homelessness in Swale are parental eviction and the loss of a private rented tenancy. These two reasons account for 50% of homeless acceptances.

¹

<https://www.ons.gov.uk/peoplepopulationandcommunity/housing/datasets/ratioofhousepricetoworkplacebasedearningslowerquartileandmedian>

Interestingly, a significant number of single people are accepted as vulnerable when they leave prison (5), hospital (7), and care (9). Collectively, people leaving these institutions accounted for 12% of homeless priority need acceptances in 2017/18. It should however be noted that there are three prisons in Swale and a higher than average proportion of prisoners have significant mental health issues. Swale also has one of the highest levels of care leavers and children in care across the County and is the second most deprived borough in Kent bringing with it associated health problems.

Table two: reasons for homelessness

Reason for homelessness	2015/16	2016/17	2017/18
Parental eviction	29	45	43
Other friends'/relatives' eviction	27	35	17
Loss of private tenancy AST	26	31	51
Non-violent relationship breakdown	6	12	13
Violent relationship breakdown	7	11	11
Other forms of violence	5	3	0
Racial and harassment	1	0	0
Mortgage arrears	0	2	1
Rent arrears – social tenancy	0	2	2
Rent arrears – private tenancy	2	4	4
Left hospital/prison/care	8	14	21
Other	1	4	5
Total	112	163	168

2.2.3. Priority need

Across the three years, having dependent children or being pregnant together account for the largest 'priority need' category, making up 58% of cases. 14% are from those who have mental ill health; 12% from young people or those who have been in care. This on the whole reflects the picture nationally.

Table three: homeless acceptances by priority need

Priority need category	2015/16	2016/17	2017/18
Dependent children	50	77	94
Pregnant	8	16	12

Priority need category	2015/16	2016/17	2017/18
16/17 years old/care leavers	17	20	17
Physical disability	13	15	11
Mental illness/disability	17	20	25
Domestic violence	4	8	2
Violence (non-DV)	1	1	
Old age	1	6	6
Emergency (fire flood, etc)	1		1
Total	112	163	168

2.2.4. Age profile

The age group most vulnerable to homelessness in Swale is people aged 25-44, accounting for almost half of all homeless acceptances in 2017/18. This number will include mainly families and reflects the difficulties young families have in securing housing in other sectors. The second largest age group at risk of homelessness is those aged 16-24 and while this will also include some young families, it is important that there is adequate support available to enable the most vulnerable young people to remain living at home.

Table four: homeless acceptances by age

Age	2015/16	2016/17	2017/18
16 – 24	55	72	71
25 – 44	37	65	73
45 – 59	14	18	14
60 – 64	1	3	4
65 and over	5	5	6
Total	112	163	168

2.2.5. Household type

The household type at most risk of homelessness is families with dependent children who account for just over 60% of acceptances in 2017/18. This reflects the national picture and

the affordability problem in Swale in both the private rental market and in home ownership.

Table five: homeless acceptances by household type

Household type	2015/16	2016/17	2017/18
Family with children	59	92	105
Single People	49	57	57
Couple	4	14	6
Total	112	163	168

2.2.6. Ethnicity

The accepted homeless households are mainly white, although there are a small number from other ethnic groups. This broadly reflects the makeup of the borough which has 3.4% minority ethnic population.

Table six: ethnicity of accepted households

Ethnic Group	2015/16	2016/17	2017/18
White	108	156	159
Black	0	2	5
Asian	0	1	1
Mixed	1	4	3
Other	3	0	0
Total	112	163	168

2.2.7. Comparison with other authorities

In comparison with other authorities it appears that the number of homeless acceptances in Swale per 1,000 households is higher than the All England and the South East authorities with a rate of 0.81 per 1,000 households. However, Dartford, Thanet and Dover are comparable and have similar numbers.

With regards to the number of households in temporary accommodation, the South East average is 2.24 per 1,000 households with Swale being slightly higher at 2.48. This is comparable with three other Kent authorities, Thanet, Medway and Ashford with 2.63, 3.01 and 3.16 respectively.

As a further comparison, the homeless numbers per 1,000 population have been compared with the CIPFA Nearest Neighbour Group top three. This shows that, when compared with similar authorities, Swale's numbers in temporary accommodation are relatively high and further investigation will take place as part of this review.

Table seven: homeless acceptances/No. in TA per 1000 households as at 31/03/18²

	Acceptances per 1000 households	Number in TA per 1000 households
All England	0.57	3.40
London	0.92	14.93
Rest of England	0.50	1.28
South East	0.48	2.24
Swale BC	0.81	2.48
Other Kent LAs		
Ashford	0.68	3.16
Canterbury	0.26	1.05
Dartford	0.86	2.48
Dover	0.91	1.75
Gravesham	0.00	1.63
Maidstone	0.62	1.43
Medway	0.27	3.01
Sevenoaks	0.10	1.33
Folkestone & Hythe	0.34	0.71
Thanet	0.71	2.63

² Table 784a MCHLG homelessness statistical reports

	Acceptances per 1000 households	Number in TA per 1000 households
Tonbridge & Malling	0.39	0.68
Tunbridge Wells	0.22	0.92
CIPFA Group		
Braintree	0.23	0.45
Dover	0.91	1.75
East Staffordshire	0.58	0.42

2.3 Demand on the housing options team

Demand on the Housing Options service continues to rise. In 2015/16 there were 845 prevention cases opened, rising to 1,247 in 2016/17 and 1,338 in 2017/18. This clearly demonstrates an increasing demand, which is forecast to continue especially in light of the new prevention duties contained in the Homelessness Reduction Act.

Data is available on the number of approaches since the Homelessness Reduction Act came into force in April 2018. This shows that in the first six months 772 new cases were opened, an average of 128 each month. If demand continues at this level the annual demand for 2018/19 will be around 1,544, an increase of 200.

However the biggest change for the service will be the requirement to engage in ongoing homelessness prevention casework for those meeting the new 'homeless in the next 56 days' criteria. At the end of October, caseloads for prevention were in the region of 12-14 cases per officer in addition to their day to day duties.

The demands on the service seem to be well understood by the team and graphs which have modelled the potential impact of various initiatives (including the Landlord Scheme and Direct Lets) have been shared. Information seems to be recorded well and this has assisted in analysing and understanding trends.

2.4 Future levels of homelessness

It is difficult to accurately predict future levels of demand but homelessness is predicted to continue to rise nationally as highlighted in the Crisis report: The Homelessness Monitor: England 2018. This shows that the number of homeless families and individuals placed in temporary accommodation nationally jumped to 78,000 last year, an 8% rise on the year and a massive 60% rise since 2012³.

³ https://www.crisis.org.uk/media/238700/homelessness_monitor_england_2018.pdf

The Homelessness Reduction Act 2017 when it came into effect in April 2018 brought new duties to provide advice and support to any person facing homelessness in the borough irrespective of their local connection or priority need status.

The following factors are likely to impact on the demand for services in future:

- Welfare Reform including the full roll out of Universal Credit
- Escalating private rent levels and Local Housing Allowance rates
- Lack of new affordable housing supply.

With a renewed emphasis on preventing homelessness and Government funding to help relieve rough sleeping, the aspiration is that current levels of homelessness will remain consistent if not reduced.

Officers report a culture within Swale of high expectations of access to social housing, especially amongst the families of existing social housing tenants. In order to address this, steps need to be taken to change public perceptions and publicly advertise what the Housing Options Service can and cannot provide; that access to social housing has changed with the new HRA prevention approach and that as a result access to social housing for people in housing need is no longer guaranteed.

2.5 Homelessness in Swale – key issues

- The number of homeless acceptances has increased by 50% over three years. This is reflective of the challenges in accessing affordable homes in the private rented sector, increasing private rent levels and static Local Housing Allowance rates
- The two main causes of homelessness in Swale are parental eviction and the loss of private rented tenancies. These two reasons account for 50% of homeless acceptances
- The age group most vulnerable to homelessness in Swale is 25-44, accounting for almost half of all homeless acceptances in 2017/18. This number includes families and reflects the difficulties younger people have in securing alternative housing
- Compared to other similar local authorities, the numbers in temporary accommodation are high (see page 10 for context) and continued effort is needed to reduce this
- Demand for frontline housing advice services is increasing, especially driven by the challenges people face in accessing the private sector. This is likely to continue to increase unless LHA rates are brought in line with market level rents
- Although the demand for affordable homes continues to rise, officers need to challenge and change the public perception that social housing is available to anyone who approaches the Council. Social media may be used to help reinforce this message.

3. Findings - review of the activities to prevent homelessness

3.1 Housing information and advice – Frontline

The Housing Options Service is based in the Council offices in Sittingbourne and is available during normal working hours predominately via a telephone system. An out of hour's homeless emergency service is available through a corporate emergency line which will connect with an on call frontline officer.

General housing advice can be given over the phone by a duty officer who will do an initial assessment of the client's circumstances. The Housing Options team was, up until a re-structure in March 2018, fully generic with officers being responsible for all functions across the entire service. Due to the pressures on the team created by this approach the structure was changed to three teams: Housing Options, Housing Register and an Accommodation Team managing temporary accommodation.

The Council's website has been 'under review' for some time and officers report that they were unable to make changes to reflect the Homelessness Reduction Act when it was introduced in April but that updated pages have been ready for some time. The current website has limited information about homeless prevention and does not reflect the new approach and the strengthened focus on prevention and personalised housing plans. There is more information on the website relating to the Housing Register with links to Kent Homechoice which has a very helpful video explaining about how to apply along with a pre-assessment on-line tool. Additional promotional methods could be utilised for example the Councils Facebook pages to ensure information about the housing service is readily available and giving the right homelessness prevention messages.

We found that when people visit the Council office they are directed to a telephone kiosk to call Housing Officers to discuss their circumstances. This is not private and phone calls can be overheard by other staff and customers. This can be embarrassing for customers and should be reviewed as other methods would provide a better customer experience. The phone line is not always available and if it is busy people have to 'hold' for prolonged periods before their call is answered. If the duty officer is able to see customers face to face they can be left waiting in reception for lengthy periods of time and can become anxious. While the telephone service was introduced in order to save time, there are better methods of managing demand and providing a better customer experience. The telephone system should therefore be reviewed.

A large demand for housing advice comes from the Isle of Sheppey (Sheppey Gateway hub). There was a daily front line presence at the Gateway until about 18 months ago and Members of the public were able to book appointments there, however due to staff resourcing it was decided to remove this service. This should be reviewed in order to improve the customer experience.

Customer Services staff across the Council are not qualified, trained or tasked with giving basic housing advice and do not have any information to hand out about what Housing Services can or cannot help with. There is opportunity for Customer Service staff to up-skill and provide basic housing advice. This is a tried and tested approach among local authorities and a useful way of helping manage customer demand and expectations as well as improving customer service. Staff would need to be appropriately trained and have clear boundaries of responsibilities.

3.2 Early identification and pre-crisis intervention – Triage

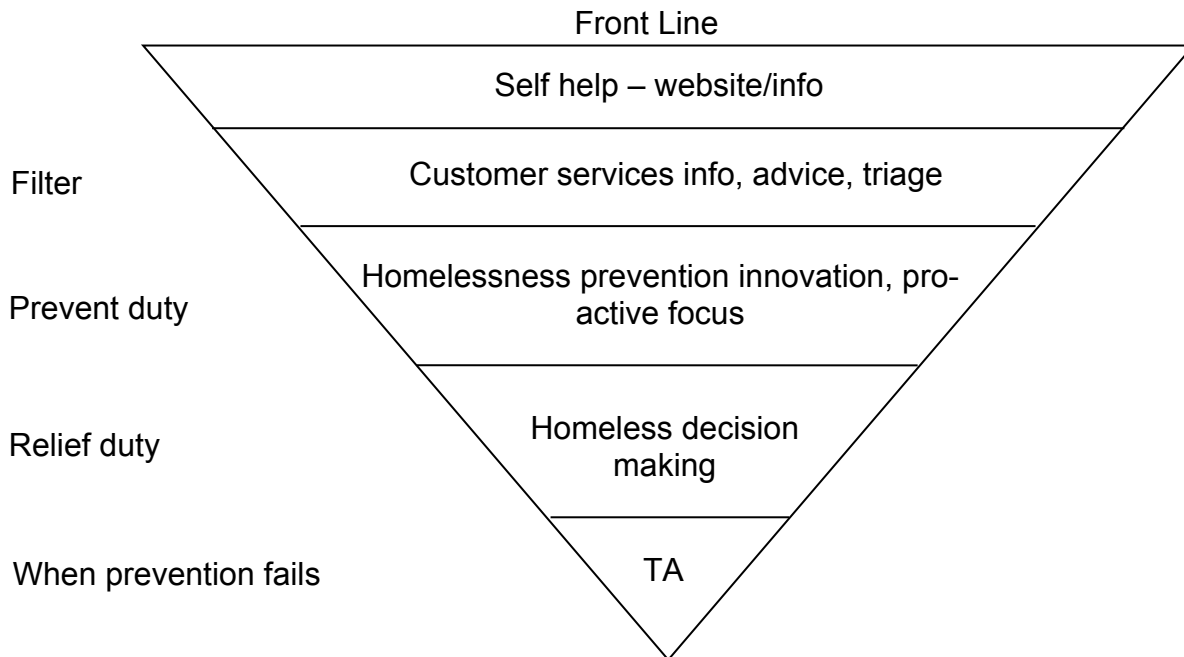
Customers identified through an initial triage telephone call as threatened with homelessness within 56 days are sent a letter asking them to provide numerous documents, evidence of their impending homelessness and a fully completed income and expenditure form. On receipt of this information the applicant will qualify for a full telephone interview. That interview will inform a personalised housing plan drawn up by the Housing Options Officer. This seems to be a 'system' rather than 'customer focussed' approach to homelessness prevention and the amount of paperwork that potential applicants are asked to provide before they are offered a telephone interview is substantial and must be unmanageable for some. The IT system used to implement the Homelessness Reduction Act introduced a Housing Assistance Referral Portal through which people can be either referred or self-refer for housing assistance however there is no link on the Councils website and it is understood that this is not routinely used.

The Housing Options service is currently structured as a 'generic' service with Officers carrying out all roles including initial triage, homeless prevention, homelessness assessment and relief, booking into temporary accommodation and housing register assessment. Despite the recent move away from specialisms towards generic roles, there seems to have been an informal practice of directing some staff members in the accommodation team to focus on certain aspects of the service, e.g. single homeless with support needs, private rental eviction. This has led to a blurring of roles and responsibilities. There is a need to reconsider how the service is structured in order to improve customer service.

There is a strong case for reintroducing specialist roles within the team, providing focus and resources where it is most needed. Redefining and clarifying roles and responsibilities going forwards will help staff and lead to greater transparency. Home visits are not carried out routinely in cases of threatened homelessness from family or friends, nor from loss of private rented properties and this should be reviewed given that the majority of homeless cases are either parental/family eviction or loss of a private tenancy. Interventions should include relationship-building with private landlords and lettings agencies and active engagement, mediation and provision of support to families to prevent family breakdown.

Good practice for housing advice services involves making best use of front facing customer service staff to deliver basic housing advice, information and the initial referral of cases through the Referral Portal. Homelessness prevention and homelessness decision making requires a significant level of knowledge and understanding of housing law, welfare benefits, homelessness case law etc. and experienced staff. Making best use of existing frontline services delivers a more efficient model of service. The model illustrated

below demonstrates how the housing advice 'filter' can makes best use of front line services.



3.3 Homelessness prevention

The Council monitors and records the number of approaches, how many households receive advice and how many cases of homelessness are prevented or relieved. The table below shows the position for the last three years.

Table eight: Homelessness prevention

Prevention outcome	2015/16	2016/17	2017/18
New prevention cases opened	845	1247	1338
Able to remain in current home	150	141	92
Assisted to obtain alternative housing (inc. via deposit scheme)	127	88	77
Total	277	229	169

There is some very effective prevention work undertaken by officers but it can be seen that this is getting more difficult, with the total prevented in 2017/18 reduced to 169, the lowest in the last three years. This is as a direct result of unaffordable rents in the private rented sector and the increasing difficulty in accessing housing.

Table nine: Number of homeless cases prevented via Deposit Bond

Deposit Bond Cases	2014/15	2015/16	2016/17	2017/18
Prevented via the use of Deposit Bond Scheme	73	49	20	26

The reduced number helped via the Deposit scheme over the last four years also illustrates the increasing difficulty in prevention homelessness through help with a rent deposit. However, there are very effective links with the Council’s Revenues and Benefits service and a dedicated officer assigned to the Housing Options service ensures that applications for Housing Benefit and/or Discretionary Housing Payments are dealt with quickly and efficiently. This is an example of good practice within Swale.

3.4 Homeless Prevention Fund

The Housing Options Officers have access to a Homeless Prevention Fund to provide financial support to people facing homelessness where it may prevent their homelessness. This fund is delivering significant results. In 2017/18 the team spent £35,245 on preventing homelessness for 44 households.

There is no formal policy or procedure and the team are encouraged to come up with ‘creative solutions’ to prevent homelessness. Any requests for payments are considered by a Manager and a ‘spend to save’ approach is taken, considering how much temporary accommodation would cost the Council if a payment wasn’t granted. Payments include a mixture of Rent in advance, deposits, paying arrears and some property disrepair. A £1,000 limit is usually adhered to but higher payments can be made in exceptional cases where sensible.

Good use is made of Discretionary Housing Payments (DHP) to prevent homelessness. Prior to considering a Homelessness Prevention Fund payment, officers consider whether the client could be awarded a DHP. In 2017/18, 709 discretionary housing payments were made using the total £482,106 DHP budget. A new Landlord Introduction Scheme has been introduced recently to enhance the prevention offer and this is covered in more detail later.

At present, the Prevention Fund is only available to households who fall into a priority need category. With the new relief duties towards single people, it is recommended that consideration be given to broadening it to include payments for single non-priority homeless threatened with homelessness.

There is a need for clear Policy documents to be written for the use of the Homelessness Prevention Fund (and the Landlord Introduction Scheme). A Policy should set out the

eligibility criteria, use of funds, financial limits, outcomes and delegated powers of officers. This would enable transparency and equity in the use of public funds.

3.5 *Housing Register and Allocations Policy*

Social housing in the borough is provided solely by housing associations, the Council having transferred its housing stock in 1990. Optivo (formerly Amicus Horizon) is the biggest provider and owns around 6,750 homes a mix of social rent, affordable rent and shared ownership. A number of other registered social landlords are active in the borough, owning a mix of tenure types. These include Anchor, CDS, Habinteg, Hexagon, Hyde, Moat, Orbit, West Kent, Riverside ECHG, Sanctuary and Grainger. Together they own around 1,550 homes bringing the total to around 8,300.

All homes are allocated through a choice-based lettings system 'Kent Homechoice'. When properties are advertised on the Kent Home Choice website applicants are able to express an interest (bid) for the appropriate size of home but with type and location of their choosing. These expressions of interest are then shortlisted and the property is offered to the household on the shortlist with the highest position in the highest band who qualifies for the type of property advertised. To help applicants make an informed choice, the Policy includes information about the number, type and location of homes that have become available for letting in the previous years.

The Allocations Policy was updated in 2014 in response to the Localism Act which allowed Councils to apply stricter local connection criteria to their housing registers. To qualify to join the Swale housing register, applicants currently should:

- Have lived in the Borough for four out of the last five years
- Have income of less than £35,000 and assets of less than £50,000
- Not have any unspent conviction for housing fraud
- Not have rent arrears, or if they do, they should have a sound history of repayments.

Table ten: Housing Register Applications as a snapshot

	31/03/14	31/03/15	31/03/16	31/03/17	31/03/18
Number on Register	5,417	1,423	1,119	1,123	1,112

The numbers on the housing register reduced significantly when the new Allocations Policy was introduced in 2014. Since then it has remained steady at around 1,100 applicants. It is interesting to see that the demand for affordable rented housing has not

risen despite market conditions and worsening affordability, although this may be in part due to the residency qualification criteria in the Policy.

Applicants are placed in a Band according to their housing priority. The law requires that Councils give Reasonable Preference for housing to those set out in the Housing Act 1996 (as amended) and these are clearly detailed in the Policy.

The Council uses a Banding system with four bands and applicants are further prioritised by length of time in band.

- Band A – Urgent Housing Need
- Band B – Serious Housing Need
- Band C – Reasonable preference
- Band D – General Housing Need.

The current Allocations policy does not allow applicants to register if they are renting privately but cannot afford their current home, and this does impact on the demand. The number of Housing Register applications received remains high with on average 35 – 40 applications assessed each week, approximately half of which are placed on to the Housing Register.

Because of the residency criteria, households in need have to wait until they are accepted as ‘homeless’ before they can be considered on the Housing Register. Households even if they are in temporary accommodation are placed in Band C, so not awarded any significant priority.

The Housing Register is not therefore supporting the prevention of homelessness and is contributing to the increasing numbers accommodated in temporary accommodation.

3.6 Social lettings

According to the Housing Services Quarterly Performance Report, the following allocations were made in 2017/18:

Table 11: Allocations/Lettings by Band and Size

	1 bed	2 bed	3 bed	4 bed	Total	Number on register	% of lets
Band A	45	29	13	0	87	203 (18%)	22%
Band B	42	77	43	2	164	161 (15%)	42%
Band C	45	32	64	0	141	746 (67%)	36%

Band D	0	0	0	0	0	2	0%
	132	138	120	2	392	1,112	

Over 60% of allocations went to people in Bands A and B; 18% of applicants were in Band A and yet 22% of allocations went to people in this Band. Despite only 15% of applicants being in Band B, the majority of lettings (42%) went to people in this Band. The majority of applicants (67%) were in Band C. This includes homeless households to whom the Council has accepted a duty. Only 36% of allocations went to people in this Band which means that people in this Band would be waiting for the longest time to be housed. Despite making up two thirds of people on the register, Band C applicants receive only one third of lettings.

Given that the level of homeless applicants who are accepted is increasing, and given the use and cost of temporary accommodation is growing, it is important that homeless households are housed as quickly as possible. 400 lettings opportunities per year should be adequate to enable good management of 150 homeless households, accepting that a number of available properties will be for over 55s.

Prioritising categories of people in housing need is difficult and contentious but given the statistics above there is a case for re-prioritising homeless applicants to Band B, and also reconsidering the priority given to those at risk of homelessness. If the Housing Register can be used as a prevention tool, homelessness prevention will include recommending an applicant applies to the Housing Register, ensuring their needs are correctly assessed, that they receive appropriate priority banding, and information and advice about how the Allocation Scheme works.

In order to manage the numbers in temporary accommodation we have found examples of positive practice in allocations including periods of direct letting to homeless households in an effort to reduce the number of households accommodated. It is hoped that this practice be continued at times of high pressure to alleviate housing stress and associated costs as an interim measure until the Allocations Policy can be reviewed.

3.7 Debt and money advice

The Council provides £133,000 core funding to the Citizens Advice Bureau annually in the form of a Grant. The Service has a base in Sittingbourne within the borough council offices. They also run advice services from Stone Street in Faversham and Sheppey Gateway in Sheerness to which Minster-on-Sea Parish Council contributes funding.

It is a relatively small service offering advice and information to people who live and work in the community. They are equipped to respond to any issue, including benefits, consumer, relationships, housing, employment and money advice. There are two debt caseworkers and two welfare benefits specialists within the team. The CAB reports good working relationships with the Housing Options service on an operational case level, but CAB Managers find it difficult to keep up to date with changes in service provision across the wider partnership and would look to the Council to facilitate partnership networks.

In addition there are other financial advice services in the borough such as Kent Savers and a Family Finance Worker within Children and Families Ltd.

3.8 *Private landlords and letting agents*

The number of private landlords working with the Council directly to meet housing need is relatively high given the rates of Local Housing Allowance in the borough and steps are being taken to further develop these relationships.

The Council holds regular twice yearly Landlord Forums and these are well attended. 200 private landlords are signed up to the Landlord Accreditation scheme and relationships are generally good. Landlords are required to attend ten hours training each year to maintain their accredited status and courses and training are provided in partnership with Medway Council. Focus at the forums in recent years has been on benefits including Universal Credit as these are a major concern for landlords.

The Council has introduced a new 'Landlord Introduction Scheme' for individual private landlords (not Letting Agents) designed to offer private landlords more help and support in addition to the Deposit bond. This acknowledges the concerns landlords have regarding benefit changes and the impact this is having on their willingness to work with the Council. It is a measure of the strength of relationship with landlords that they are keen to continue to work with officers and resist pressure from other councils and London boroughs to take large incentive payments.

The new offer is a trial and involves the payment of six-months rent in advance to the landlord, with the Council collecting the rent repayments back directly from Housing Benefit or Universal Credit during the initial period. Many landlords will now approach the Accommodation Team directly if they develop problems with tenants. There are examples of positive interventions to prevent homelessness including tenancy sustainment work. In addition the accommodation team will work with the new tenants providing them with the necessary support and knowledge to maintain their homes and ensure rent payments are made regularly.

During the initial tenancy period support needs are identified and referrals are made to other partner agencies to continue providing support where needed, ensuring a holistic approach to homelessness prevention. This service is responsive to people's needs and currently provides support for 23 people across the LIS and Deposit bond schemes.

The new Landlord Introduction Scheme has got off to a positive start with 4 households being housed, and another four households in the pipeline. The potential for partnerships with private landlords has been explored and this scheme has great potential and is a useful tool in the Council's approach to prevention. The trial has been running since May and has several other landlords interested in the scheme but with no vacancies available.

3.9 *Mortgage rescue schemes*

There are very low levels of homelessness due to mortgage repossession with only two cases accepted in 2016/17 and one in 2017/18 so this is not a priority area for service

development. Information and advice on financial planning is of benefit in these cases and owners would be referred to advice and support agencies as appropriate. The Homelessness Prevention fund can be accessed if small grants can be used to solve homelessness.

3.10 Social landlords

There are pre-eviction protocols with social landlords in the borough. A protocol was agreed in 2015 with Optivo and officers report that this generally works very well and they have few social housing evictions. The protocol includes arranging a multi-agency meeting prior to court action to ensure alternative solutions to eviction are explored. Evictions by Optivo must be authorised by a Regional Director and housing staff must complete a full 'Permission to Evict' form prior to gaining such approval.

The protocol provides that the agreement should be kept under review and should be subject to a health check every three years. With the move to Optivo and the introduction of the new Homelessness Prevention Act duties it is recommended that this, and protocols with other social housing providers are reviewed and updated.

The National Housing Federation is encouraging social landlords to adopt a 'Commitment to Refer' as they are not covered by the statutory Duty to Refer. It would be helpful to encourage all social landlords in Swale to sign up to this.

3.11 Partnerships

The Council has some effective strategic partnerships that seek to prevent homelessness. These include the Kent Homelessness Officers Group which meets six times a year also attended by the Ministry of Housing, Communities and Local Government (MHCLG) and which has achieved numerous outcomes including:

- Joint Homelessness Reduction Act training
- A Duty to Refer workshop with all agencies
- Care Leavers/16&17 year olds protocol with Social Care
- Joint Intentional homeless protocol with Social Care.

Housing Options Managers are also well linked operationally with social care, health, probation and the police taking part in joint panels and meetings on issues including vulnerable families, serious organised crime, offenders, prison release, hospital discharge, domestic abuse, etc.

There are however no local strategic homeless partnerships and no regular Homelessness Forum in Swale. Officers have tried to establish meetings locally but came up against information sharing issues as they sought to discuss individual cases. There are significant benefits for organisations who are involved in preventing homelessness and supporting homeless households to meet regularly. These strategic level discussions pave the way for operational interventions across agencies. It is recommended that a regular

Homelessness Forum is established in Swale with organisations including CAB, housing associations, support providers, food bank, etc.

3.12 Activities to prevent homelessness – key issues

- Customer access points for the Housing Service need to be reviewed along with provision of leaflets, posters and other basic customer information both on the website and in hard copy reflecting the new culture of preventing homelessness
- How the homeless prevention service is delivered operationally is a key area for future consideration with a move away from a telephone only triage service, and a move towards more customer focussed specialist officers and home visits
- The Housing Register and the Allocations Policy is not supporting the prevention of homelessness and is contributing to the increasing numbers accommodated in temporary accommodation and requires urgent review
- A Homelessness Prevention Fund Policy should be developed with clear aims, criteria and examples of appropriate uses, broadening it to include single non-priority homeless threatened with homelessness
- The Landlord Incentive Scheme should be evaluated and relationships with private landlords and letting agents further developed providing them with a dedicated officer
- Protocols with Social Housing Providers would benefit from review and updating, exploring whether RPs will sign up to the Commitment to Refer
- There is no current Homelessness Forum for partner agencies within Swale. This should be re-established in order to develop a shared approach to homeless prevention.

4. Findings – considering the needs of vulnerable groups

In order to develop effective partnerships and homelessness prevention services the Review has considered the needs of vulnerable groups in Swale, and what services are in place to support them. This exercise was carried out through a workshop with Housing Staff and discussions with Commissioners at Kent County Council. While financial pressure is affecting Kent CC as elsewhere in the country, Commissioners are clear that they value the prevention role that housing support plays in the wider context and are not intending to withdraw funding from housing related support services in the near future. They are however moving towards an evidence based commissioning model and seeking greater value for money through the remodelling of services.

Kent CC also manages the former Social Fund welfare fund having taken this over when it passed from the Department of Work and Pensions. The Council created an integrated offer including provision of food, furniture, white goods, clothing, travel warrants and

energy credits. This works well and administration of this fund was included in the specification, and can be accessed through homeless support providers.

4.1 Rough sleepers

The numbers of rough sleepers in Swale has been slowly increasing over the last seven years. The 2018 Rough Sleeper estimate was agreed with partner agencies in Swale on 22 November during the Homelessness Review project. This showed 32 people sleeping rough in the borough a significant increase on previous years. Rough sleeping is the most extreme form of housing need and the increase in Swale shows that a fresh approach is needed.

Table 12: Rough Sleepers in Swale by Year

2013	5
2014	2
2015	6
2016	6
2017	9
2018	32

The increase can be put down to the lack of affordable accommodation in the area combined with the additional support needs experienced by this group. Landlords are reluctant to let their properties to this cohort and even though the Council has had some success with HMO's, many of the identified rough sleepers are known to the housing service and have been evicted from various accommodation types.

There are no night shelters running in the borough and the Council is working on a bid from MHCLG for the rough sleeping cold weather fund with a plan to work with Porchlight to deliver it.

New Severe Weather Emergency Provision and Extended Winter Provision Guidance has been published recently by Homeless Link in partnership with MHCLG. Historically, the minimum SWEP response from Local Authorities was to open provision when there was a forecast of zero degrees, or below zero, for three consecutive nights.

Local Authorities such as Swale where rough sleeping numbers have historically been low have not developed a formal SWEP response. An adequate policy would ensure that the local authority can provide suitable accommodation quickly to prevent harm and death due to severe weather conditions. This could be through delivering SWEP in partnership with neighbouring authorities. In Swale SWEP provision is available through the use of bed and breakfast accommodation in periods of severe weather.

In the period February to March 2018, the coldest part of the year, the Council accommodated 7 rough sleepers at a cost of £990 (Gross - Housing Benefit was claimed for the placements). In extended periods of severe weather this could prove costly and a partnership approach to developing provision is recommended and underway using the Rough Sleeper Initiative.

4.2 Single homeless people ‘sofa surfers’

There are people in the borough who are not rough sleeping but have nowhere settled to live. Experience demonstrates that these are likely to be mainly younger people who move from one friend or relative to another as they are unable to secure a permanent social rented home. Usually their income is insufficient to afford privately rented accommodation and the only option for this group is to share with friends, try to access the private sector or access the Riverside Supported Housing project at The Quays in Sittingbourne. Kent CC is currently re-designing the pathway for homeless people with support needs which includes a review of the large scale hostel model which is evident at The Quays. This is an outdated model and placing lots of vulnerable households in on location creates its own issues as well as brining in vulnerable single people into the borough (referrals can be made by any Kent LA). Commissioners are looking towards Housing First and Trauma Informed Care as more effective combined with a more integrated service approach.

Support can currently be accessed through Porchlight who can provide support for single homeless people or those sofa surfing. It is this group in particular that the introduction of the Homelessness Reduction Act is designed to assist through providing a personalised housing plan and support needs assessment. The new HRA relief duty also applies to single people who do not have a priority need, so options to increase the number of properties available to this group in the private sector through shared housing or Houses in Multiple Occupation will be key.

4.3 Young people and care leavers

The number of young people approaching the Council is relatively low, and joint protocol arrangements are in place with Kent County Council to assess the needs of any young person aged 16/17 who may be at risk of homelessness. There are excellent joint working procedures in place between the Housing Options Team and Social Services Adolescent Team, ensuring joint assessments are undertaken to establish how a young person’s homelessness will be managed moving forward. Most young people move into dedicated supported housing in the borough.

Kent County Council however, has been severely impacted in recent years by large numbers of unaccompanied asylum-seekers arriving in the County, placing significant pressure on young people’s services. In response, Commissioners have re-tendered the contract for young people’s supported housing and will, in future, ring-fence its use to those young people whom the County Council has a statutory responsibility towards, i.e. Care Leavers, along with homeless 16/17 year olds owed a duty under the joint protocol.

This risks leaving a gap in provision for those who may not meet statutory thresholds for provision. In response, the Council could consider adopting a pro-active prevention approach including home visits, using officers skilled in mediation to resolve problems and working with Social Care and other partners to talk about housing and homelessness in schools.

4.4 Vulnerable families

Families who are at risk of homelessness or who have become homeless and have moved into temporary accommodation have a variety of support needs. They may have to move away from their usual family support networks, and children may have to change schools. This combined with a relationship breakdown or financial worries can result in households with support needs of one type or another.

Financial support can be offered through arrangements with the local Citizens Advice Bureau and through support provided by Christians Against Poverty (CAP) who provide a money advice helpline and support with budgeting. The Council also has good links with Step Change and Kent Savers Credit Union. Housing Options officers can provide food bank vouchers and refer to other agencies to ensure that support needs of vulnerable families are met including Family Action and Home-Start. A local second-hand furniture store is available providing cheap furniture to families in need.

Supported accommodation is available for families who need additional support at Plough Court, a Kent CC commissioned project which takes referrals from across Kent. Both Optivo and Moat, the two main social housing providers, run their own in-house floating support services ensuring that evictions from their properties are rare.

4.5 Victims of domestic abuse (DA)

Incidents of domestic abuse leading to homelessness are common and require a multi-agency response to keep victims safe. There is a Refuge in the borough provided by Centra delivering accommodation and support.

Outreach and support services are provided for victims by SATEDA (Swale Action to End Domestic Abuse) a local organisation which provides support and advocacy, raises awareness of domestic abuse and delivers preventative projects. SATEDA are part of Kent Domestic Abuse Consortium and are based within the Council offices allowing direct referrals to be made.

The Council contributes £21,000 annually to the Kent Integrated Domestic Abuse Service which includes IDVA provision, refuge and outreach services (medium risk victims). In addition, £14,500 is contributes to SATEDA.

Housing managers are involved with multi-agency partnership working around domestic abuse including attendance at the Multi-Agency Risk Assessment Conference (MARAC) which aims to reduce the risk of serious harm to high-risk victims and their children by sharing information. The officer previously responsible for dealing with domestic abuse victims has been moved to another role within the team. Consideration

should be given to whether it would be of benefit to victims to re-instate this specialist service.

4.6 *People with a mental health problem*

With mental health being one of the highest 'priority need' categories of those accepted as homeless, it is essential that good relationships exist with partners in this field. Officers report good relationships with the Community Mental Health Team and effective support for this group is provided by Porchlight.

A Kent-wide protocol exists for those being discharged from Psychiatric Hospital although this is rather out of date. A local procedure has since been created and operationally, this works well and has improved the discharge of homeless applicants directly to the housing service.

A gap in services has been identified for complex dual-diagnosis clients who may have drug and alcohol addictions in addition to mental health problems. These customers present challenging behaviours and often fall through the net due to a lack of specialist services. There is no intensive high needs supported housing provision for this group and this gap in service should be kept under review.

4.7 *Offenders, former offenders and those at risk of offending*

Within Swale there are three prisons on the Isle of Sheppey. The inmate population is in the region of 2,800. One of the prisons, Standford Hill, is an open prison holding 484 category D sentenced male adults. The main prison focus is for prisoners to work in the community, carrying out reparative work or engaging in paid employment towards the end of their sentence. Many prisoners who have settled in employment locally approach the Council on release for housing.

The Housing Options Team work well with probation services and has good relations with Probation and the prisons. Kent Housing Group agreed a Kent Accommodation Protocol for Resettlement and Housing of Offenders in May 2013, although officers report that this outdated and in practice not really followed. Managers have focussed on building strong operational relationships with agencies and have set up their own referral processes and regular meetings with Probation regarding prison releases.

More recently, Kent Housing Group has produced a Factsheet available through Kent Homechoice which outlines the services and support available to prisoners both before their sentence ends and outlining what options are available to them if they are to become homeless on release. Only a few who are considered vulnerable will qualify for housing with the Council as homeless.

Nacro, in partnership with Centra have been commissioned by the Kent, Surrey and Sussex CRC to deliver housing brokerage services both in custody and in the community throughout Kent. The service provides information, advice and guidance to service users to ensure they have a realistic understanding of their housing options and support them to take steps to secure safe and secure placements.

In custody, Nacro support individuals as they begin their sentence and also as they prepare for release with an aim to ensure that they leave custody with safe and secure accommodation. In the community, Centra provide support to those on community orders and on licence with an aim to ensure that they obtain and sustain a safe and secure placement.

It should be noted that Kent CC has decided to withdraw support funding for the Hope Project in Sheerness from April 2019. This is as a result of the changes in 2014 which resulted in the formation of the Kent, Surrey and Sussex Community Rehabilitation Company (CRC) and their new responsibility to provide support to offenders and former offenders. The Council may wish to work with Pathways the current provider to plan for the future if it wishes to retain this resource.

Housing Officers are represented on the Multi-Agency Public Protection Arrangements (MAPPA) panel and cases are dealt with through a partnership approach. On the whole partnerships and associated services for this group are mature and well developed.

4.8 People with substance misuse or drug and alcohol problems

People with substance misuse issues approaching the Council often have complex needs, including mental health problems (as mentioned earlier in this report) and can be hard to engage and work with. The Forward Trust took the Kent County Council contract for the Drug and Alcohol Service over from Turning Point in May 2017. The service provides practical support to residents who are struggling with drug and alcohol misuse and is provided in partnership with Nacro and ReThink to continue to improve services by placing a team around individuals and their families.

4.9 Older people

The number of older people becoming homeless is minimal due to the availability of sheltered and general over 55's housing. Older people can usually be housed through the Housing Register into suitable accommodation before homelessness occurs. Dedicated frail older persons supported housing is provided in the borough's extra care scheme at Regis Gate in Sittingbourne. The Council's Staying Put Service manages older persons/vulnerable discharges via their own processes, and when required, joint working on cases is undertaken.

4.10 People with a learning or physical disability

Numbers of people approaching the Council with either physical or learning disabilities are relatively low and when accepted as homeless a pro-active approach is taken to identifying adapted properties. As above, the Council's Staying Put service has a pro-active approach to ensuring people are able to access accommodation and have a dedicated Occupational Therapist sitting within the team.

4.11 Identifying what supported accommodation is available

There are a number of supported housing schemes in Swale. The County Council is currently re-tendering all supported housing and the outcome of this process is awaited. However current provision is shown below:

Table 13: Supported housing in Swale

Client Group	Provider	No.	Location
Young People	Centra	20	Bridge House, Sheerness
	Porchlight	10	Old Johnson House, S'bourne
Domestic Abuse	Centra	9	Swale
Single homeless	Riverside	84	The Quays, Sittingbourne
Mental Health	Sanctuary	14	Prices Ct, Sittingbourne
	Sanctuary	8	Church House, Faversham
	Community Rehab Services	8	Archer House, Sittingbourne
Offenders	Pathways	4	Hope Project, Sheerness
Homeless families with support needs	Centra	14	Plough Court, Sittingbourne
Homeless families Temporary accommodation	Optivo	14	Tylden House, Sittingbourne
Extra Care 55+	Optivo	51	Regis Gate, Sittingbourne
Total		236	

As can be seen by the table above there is still a significant amount of supported housing with most vulnerable client groups provided for. ** Please note referrals into these schemes are accessible to all local authorities across Kent

4.12 Floating support service

In addition to the accommodation based supported housing, Kent Floating Support Service is funded by Kent County Council and currently provided by Sanctuary Supported Living and a number of other support providers. This is a housing related support service providing support in the following areas.

- Managing housing-related issues such as homelessness, evictions and re-settlement
- Securing and maintaining a tenancy, transitioning to a new tenancy or moving on from supported accommodation
- Finding suitable accommodation and applying for accommodation via social or private landlords
- Signposting and accessing other services
- Managing finances (budgeting and benefits).

The service is accessed Kent County Council who act as a 'portal' assessing the client's needs and referring on to the most appropriate service provider. Support workers assist clients to create a personalised support plan, identify their personal goals and take the steps needed to become more independent. The service supports people in their own homes as well as supporting homeless people in the community and the support is flexible and personalised to individual needs.

4.13 The support needs of vulnerable groups – key issues

- There is currently no formal SWEP provision for rough sleepers, with bed and breakfast being offered in periods of severe weather. Options to develop SWEP provision with faith groups, charities and neighbouring authorities should be explored along with opportunities to bid for Government funding for other initiatives.
- Young people's supported housing provision will be restricted to those meeting statutory thresholds in future, leaving a gap in service for young people not considered vulnerable.
- There is a potential gap in service for complex dual-diagnosis clients who may have drug and alcohol addictions in addition to mental health problems and demonstrate challenging behaviours. This group may fall through the net and end up sleeping rough due to a lack of high needs supported housing
- Supported housing is currently generally meeting the needs of vulnerable groups but could become at risk should the County Council decide to withdraw support funding in future. This should be kept under review. In the meantime, the Council should ensure it is fully engaged with service providers and commissioners and the re-modelling of services in order to meet the needs of Swale's most vulnerable residents.

5. Findings – review of temporary accommodation

5.1 Number of households in temporary accommodation

The table below illustrates the numbers in temporary accommodation over the last four years and how these have more than doubled.

Table 14: Numbers in temporary accommodation as a snapshot SWALE

Type of accommodation	30/6/15	31/03/16	31/03/17	31/3/18
Bed and breakfast	19	27	36	24
Of which. No in B&B with children for > 6wks	0	2	1	2
Nightly paid, private accommodation.	8	11	61	53
Hostel	14	13	13	13
Private Sector Leased/RP	6	5	3	3
Own Stock	1	2	6	6
RP Stock	20	37	36	51
Total	68	95	155	150
No. housed outside of borough	14	22	60	25

There is a mixed portfolio of temporary accommodation and there is evidence that the staff make good use of this resource by matching people and property appropriately. There appear to be some ad hoc proposals for developing new temporary accommodation but it is not clear who is leading on this within the Council.

5.2 Bed and Breakfast

The Council still uses bed and breakfast accommodation for a number of households although usually manages to move families with children on into other accommodation before the six-week legal limit. All bed and breakfast establishments are inspected by Environmental Health Officers to check their suitability before households are placed there and if they are out of area checks are made with that local authority.

Positively, the Council responded to the increased use of B&B and intervened, buying three properties for use as additional Temporary Accommodation – see below.

5.3 Hostel accommodation

The Council's main social landlord Optivo owns and manages a 14 unit hostel called Tylden House in Sittingbourne. This is mostly used to move families on from bed and

breakfast although if families have their own furniture and are an ‘accepted’ case self-contained accommodation will be sought instead.

The hostel provides good quality accommodation including communal rooms and laundry facilities. Accommodation can be used flexibly with the ability to add rooms to a unit or block them off depending on the size of household being accommodated. Bathrooms are however shared between two households which is not ideal.

The hostel is staffed part-time during normal working hours Monday to Friday by two Partnership Officers who also manage the Optivo owned self-contained temporary accommodation units in the area. The officers are experienced and knowledgeable and appear to have effective policies and processes in place to robustly manage the hostel. Rents for the units vary from £127.64 for a one-bedroom unit to £130.57 for a two bedroom with all this covered by benefits except a £10.93 ineligible charge the resident pay themselves for heating, lighting and hot water, etc. The Council is charged £40 per week per household for hostel provision.

5.4 Swale BC owned houses

The Council owns and manages three properties as temporary accommodation in the borough. The first property in London Road was purchased over 10 years ago as a long term empty. This was initially rented out through a letting agent but it has been used for homeless households for the last six years. Oak Road was purchased in November 2014 and Coronation Road in January 2016 to alleviate pressure on temporary accommodation and reduce the use of bed and breakfast.

Table 15: Council owned temporary accommodation

Location	Size	No. households	Total occupancy	Rent level
Oak Road Sittingbourne	Three bed house	2	5 people (inc child)	£109.62
Coronation Road Sheerness	Three bed house	2	5 people (inc child)	£109.62
London Road Sittingbourne	Two bed house	1	5 people	£138.08

These three properties are managed in-house by the newly formed Accommodation Team which provides management, cleaning of communal areas, rent collection and general support to the households living there. One of the Sittingbourne properties is currently empty awaiting refurbishment including the conversion of a downstairs living room into a further bedroom.

These properties cover the costs of the staff used to manage them and are significantly cheaper than alternative temporary accommodation available although a full review is recommended taking into account the costs of maintaining and refurbishing the properties

5.5 Optivo temporary tenancies

The Council has a service level agreement with Optivo, the main housing provider in the borough, to use some of its social rented properties as temporary accommodation. The SLA was revised recently to provide up to 100 properties (an increase of 46 from the last SLA, although not all 100 at any one time). The Council has a good relationship with Optivo and it is clear they are supportive of the Council's efforts to reduce numbers however, the Optivo Board have made it clear that this is not a permanent arrangement and should not be relied upon going forward.

The number of Optivo properties in use was 51 on 31 March 2018. The arrangement with Optivo is helpful in the current climate with costs increasing and is offered at a significantly favourable rate to the Council (£40 per week per property) than nightly let properties (c. £40 per night). However, it must be noted that every property taken out of stock to use as temporary accommodation is a property not then available for permanent letting. If it were permanently let then a homeless household could have been offered it with no ongoing additional cost.

Some efforts have been made to convert temporary tenancies to permanent homes where the property is the right size and the tenant has settled well. This is reviewed at regular partnership meetings with Optivo and each case is reviewed on an individual basis.

The temporary tenancies (as mentioned above) are managed by the Optivo Partnership Officers based at the hostel in Sittingbourne providing basic tenancy support as required.

5.6 Nightly lets

The Council along with many others has taken on properties which although self-contained are paid for on a 'nightly let' basis. The nightly cost of these properties is usually lower than the cost of bed and breakfast and provides self-contained, so more suitable accommodation especially for families.

The Council has procedures in place for procuring temporary accommodation which were the subject of a recent Audit Review. This included a finding that accommodation rates are negotiated where possible, that rates are subject to market forces not under the control of the Council but that sufficient controls are in place to mitigate the risk of overspending although being demand led this is still a risk. All nightly let properties in the borough are subject to inspection by Environmental Health prior to occupation.

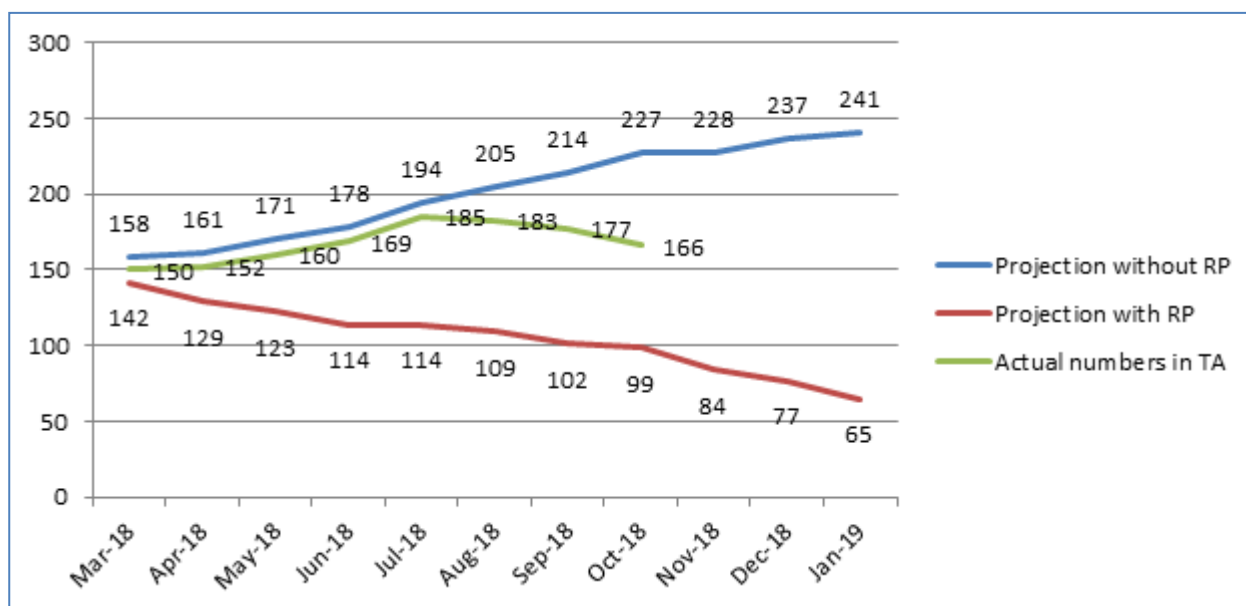
As the nightly rate is well above the Local housing Allowance rates the Council only re-charges residents rent to the LHA rate level. This ensures that the cost is covered by Housing Benefit or Universal Credit but effectively means the council is subsidising the accommodation. A priority will be a reduction in these most expensive nightly let properties, especially those properties located out of the borough.

5.7 Numbers and move on

With numbers in temporary accommodation increasing year on year the Council has developed a recovery plan to better manage demand. The figure below shows the projection for temporary accommodation numbers with and without a recovery plan. Arrangements have been put in place for 'direct lets' to be made for homeless households and from 1 October 2018, 50% of all voids will be offered to Housing Options as direct lets for homeless. As at 11 October Optivo had offered 19 properties for direct letting, of which five have moved in, with seven planned moves due to take place. The number of households in temporary accommodation on the 23 October 2018 was 165.

As can be seen below the plan is delivering results with the numbers in temporary accommodation already beginning to fall. This demonstrates an effective management framework able to identify and manage this issue but also highlights the need to award increased priority for homeless households on the Housing Register through the Allocations Policy if the numbers and associated costs are to be brought down in the longer term.

Council temporary accommodation recovery plan



5.8 Costs of temporary accommodation

The cost of increasing numbers in temporary accommodation is of major concern to the Council. In 2018/19, the estimated gross cost is £1.3m set against income including Housing Benefit and the government's Flexible Homelessness Support Grant of nearing £800k, the total net cost to the Council is in the region of £0.5m.

Reducing the cost of temporary accommodation is a key priority for the Council so consideration could be given to purchasing additional properties to manage in house using

the existing Accommodation Team resources or consider developing alternative accommodation on Council or Optivo owned sites. This will depend on the availability of capital for this type of investment.

5.9 Out of area placements

The Council avoids out of area placements whenever possible but inevitably some households are placed out of borough. These are either bed and breakfast or self-contained nightly let properties and are usually in the Medway Council area which is around 10 miles away and on a direct rail line. Placing vulnerable households out of area causes disruption to the existing informal support networks of vulnerable families and is to be discouraged where possible or at least minimised to short prior of time.

Each placement is assessed on the circumstances of the household, what accommodation is available in Swale and what the household's support needs are, but mostly what is available.

The decision to place out of area is made by a senior housing officer or the Housing Options Manager following completion of a suitability of location form and consideration of the applicant's circumstances. There is a Kent Protocol in place for temporary accommodation placements between Kent and Medway local housing authorities. Officers did not seem to be aware/use this Protocol and so it might be appropriate for review/re-launch across the wider Kent partnership.

5.10 Review of temporary accommodation – key issues

- There is a mixed portfolio of temporary accommodation. There is evidence that staff make good use of this resource by matching people and property appropriately
- Bed and breakfast is still routinely used although officers strive to move families on to more suitable accommodation as soon as possible
- Optivo is a key partner providing hostel and self-contained temporary accommodation. Care should be taken not to increase the number of properties taken out of stock to use as temporary accommodation as this reduces the ability to permanently house people and reduce overall numbers
- Nightly lets remain costly and if there is a decrease in overall numbers handing back properties especially out of area should be a priority
- The Council's recovery plan is starting to see results but is a short term fix to a long term problem. While Optivo is willing to help in the short term, long term solutions including an overhaul of the Allocations Policy will be key to addressing this issue.

6. Findings - Housing options to relieve homelessness

The Council is well placed to help single people access housing through the use of the Riverside Supported Hostel at The Quays in Sittingbourne. The hostel is well run and can

accommodate 84 single people taking referrals from across Kent, with move on cluster flats in nearly blocks which residents can move on to when they are ready to live independently.

There are also opportunities to encourage private landlords to consider taking on groups of single people sharing properties either through lead tenant models or joint tenancies and to develop more affordable shared properties and HMOs. While these may seem like risky options to landlords, the support that the Council can now offer will be key to encouraging that offer and developing the partnership approach.

The availability of lodgings can be promoted through encouraging people to rent out a room in their home and providing information and advice on letting a room in your home. This can be promoted to home owners and can improve incomes for households struggling to manage high housing costs.

6.1 Housing options to relieve homelessness – key issues

- The Quays provides a significant resource to the Council to meet the needs of single people facing homelessness but may be at risk in future.
- Private landlords can be encouraged via the Landlord Forum to take on sharers and/or develop more shared HMO type accommodation with the Council offering dedicated landlord support
- Developing and promoting information and advice on letting rooms in your home could encourage people to make available rooms for single people at affordable rents.

7. Findings- the implementation of the Homelessness Reduction Act 2017

7.1 The Homelessness Reduction Act 2017 (HRA)

The HRA places new legal duties on English local authorities, so that everyone who is homeless or at risk of becoming homeless has access to meaningful help, irrespective of their priority need status; as long as they are eligible for housing assistance.

The Act largely amends part VII of the Housing Act 1996. It redefines the meaning of threat of homelessness by extending the period of threatened with homelessness from 28 to 56 days. There are six key aims of the Act which include:

- a) Prevention – Duty to provide casework intervention to resolve threatened homelessness and work with applicants to draw up a personalised housing plan tailored towards their individual circumstances
- b) Relief - Homelessness relief occurs when an authority has been unable to prevent homelessness but helps someone to secure alternative accommodation, even though the authority is under no statutory obligation to do so
- c) Duty to provide advisory services – Local authorities must provide free homelessness advice and information to any person in their local authority area.

This should include advice and information on preventing homelessness, securing accommodation when homeless, the rights of homeless people or those threatened with homelessness, the help that is available from the local authority or others and how to access that help

- d) Full Homelessness Duty – The full homelessness duty of settled accommodation for priority need households where prevention or relief duties have failed remains in place
- e) Co-operation – Applicants will be expected to co-operate with local authorities as the duties outlined can be ended if applicants are found to have deliberately and unreasonably refuse to co-operate
- f) Duty to refer – The new duty on other public services to refer people to homelessness teams if they are working with people who are homeless or at risk of homelessness came into force in October 2018.

7.2 Swale's progress with implementation

In Swale significant progress has been made to implement the new legislation. This has included:

- Recruitment to two additional fixed term Housing Options Officer posts
- New triage procedures on the frontline
- The purchase of an ICT system to monitor and review cases
- The adoption of best practice template plans
- Interim re-structure to provide additional resource to work with private landlords and offer support
- Commissioning a Homelessness Review and a new Strategy
- Renewed focus on developing new services
- Plans to reduce the need for temporary accommodation in the borough
- Commissioning a Staffing Review to ensure the service is fit for purpose.

This review forms part of the progress to date. The new Housing, Homelessness and Rough Sleeping Strategy will identify the Council's priorities and include recommendations for further changes to meet the requirements of the Act and deliver a pro-active homeless prevention service.

8. Findings – Assessment against Gold Standard (Good Practice)

8.1 National Practitioners Support Service (NPSS)

The NPSS supports local authorities to work together in clusters of three or more to undertake Diagnostic Peer Reviews of their services against those set out in the Gold Standard. This process is a voluntary one and helps local authorities:

- Assess how they are preventing and tackling homelessness
- Identify key strengths and weaknesses in service delivery by identifying gaps in provision and highlighting good practice
- Identify recommendations for service improvement
- Develop effective improvement plans to help maximise homelessness prevention where possible
- Help to make the best use of current resources.

Making Every Contact Count, a report written by the Ministerial Working Group on homelessness, provides the basis for the 10 local challenges. Local authorities can apply for Gold Standard recognition at Bronze, Silver or Gold level if they meet at least 60% of the 10 Local Challenges in the Diagnostic Peer Review.

Although this is a voluntary ‘quality mark’ process, currently no Kent local authorities are listed as meeting the Gold Standard at any level. As an indicator of quality however we have used the 10 local challenges to undertake a brief gap analysis of the Swale Housing Options Service. We are aware that there is a new model of Gold Standard becoming available in early 2019 taking into account the new duties in the HRA.

8.2 Ten local challenges

The table below demonstrates how the Council is partly meeting the requirements of the Gold Standard. Improvements can be made in all 10 challenge areas.

Gold Standard Challenge	Key elements	Swale position
1) To adopt a corporate commitment to prevent homelessness which has buy in across all local authority services	a) Strategic level sign up b) Investment of Government homelessness funding into services c) Evidence of joint working	Homelessness hasn't been a strategic priority until recently. Government resources have been allocated appropriately but further work is needed on joint working with both internal and external partners
2) To actively work in partnership with voluntary sector and other local partners to address support,	a) Mapping of all Voluntary and Community organisations in area b) Designated contacts	A directory of support services is available for staff listing organisations, however this does not cover education, employment and

Gold Standard Challenge	Key elements	Swale position
education, employment and training needs.	<ul style="list-style-type: none"> identified c) Partners have agreed a structured approach to working together 	training and dedicated contacts only exist in some organisations
3) To offer a Housing Options prevention service to all customers including written advice.	<ul style="list-style-type: none"> a) Service standards are in place b) All customers receive a meaningful baseline service including online information and home visits c) Systems in place to record approaches across all customer access points. d) Confirmation of advice is provided 	Service standards are in place but out of date, customers receive a very limited service across customer access points. A telephone appointment system is used for most assessments, online information on homelessness is sparse and home visits are not offered
4) To adopt a No Second Night Out model or an effective local alternative	<ul style="list-style-type: none"> a) Evidence based approach to service delivery around rough sleeping b) Timely response to rough sleepers c) Members of the public able to activate the local response d) Access to emergency accommodation and wider services, and needs assessment carried out e) Offers of reconnection made where appropriate f) Formal safeguarding case reviews triggered where appropriate 	Numbers of rough sleepers are relatively low (9) and the response is to offer B&B in severe weather. The authority's response is limited and under developed bearing in mind the priority the government is giving via the National Rough Sleepers Strategy
5) To have housing pathways agreed or in development with each key partners and client	<ul style="list-style-type: none"> g) Evidence based pathways h) Partner organisations 	Under the HRA client's support needs are assessed and pathway arrangements are in place for most client

Gold Standard Challenge	Key elements	Swale position
group that includes appropriate accommodation and support.	<p>engaged in facilitating pathways</p> <p>i) Appropriate support to access accommodation</p> <p>j) Flexible approach to pathway support</p>	groups, although some protocols are out of date and should be reviewed.
6) To develop a suitable private rented sector offer for all client groups, including advice and support to both client and landlord.	<p>a) Quality of stock available</p> <p>b) Promoting access</p> <p>c) Tackling issues around affordability</p> <p>d) Supporting tenants</p> <p>e) Supporting landlords</p> <p>f) PRS discharge of duty options</p> <p>g) Supporting shared accommodation</p> <p>h) Making best use of local service and resources.</p>	Significant progress has been made in this area through appointing dedicated staff working on a Landlord Introduction Scheme, offering support to both parties. However, this is currently only offered to 'priority need' clients, not single people and could be developed further.
7) To actively engage in preventing mortgage repossessions	<p>a) Clear strategic response and trained staff</p> <p>b) First contact point is effective with clear advice</p> <p>c) LA and partners publicise services</p> <p>d) Preventing repossession process is effective locally</p>	The number of mortgage repossessions is low so this has not been a priority for Swale.
8) To have homelessness strategy which sets out a pro-active approach to preventing homelessness and is reviewed annually to be responsive to emerging needs.	<p>a) Strategy meets basic legal requirements</p> <p>b) Focuses on positive actions, demonstrates commitment to prevention</p> <p>c) Supports operational delivery of service improvement</p>	The Service is currently being reviewed and the emerging Strategy will meet these elements

Gold Standard Challenge	Key elements	Swale position
	d) It is monitored and reviewed in partnership and aims to make the most of available resources	
9) To not place any young person aged 16 or 17 in bed and breakfast accommodation	e) No YP to be placed in B&B in previous 12 months f) Joint protocol focuses on prevention. g) Early intervention and prevention service for YP in housing need (under 25s) h) Positive pathway approach to preventing youth homelessness i) Appropriate and supportive accommodation options available for YP	Swale works closely with Kent County Council on 16/17 year olds and has mature and effective pathways for this group where this is a statutory responsibility, although occasionally B&B is used as an emergency measure. Further work is needed on the broader prevention offer to young people to whom the LA does not have a duty to accommodate.
10) To not place any families in bed and breakfast accommodation in an emergency and for no longer than six weeks	j) Not to place in B&B and for no longer than six weeks k) Strategic approach to ensure B&B is only ever used in an emergency l) Prevention focus supports reduction in use of B&B m) When B& is used in an emergency it is with ongoing support.	B&B is still routinely used for families although it is rare that families are there more than six weeks. Basic support is provided and the new prevention approach in the Strategy will support the reduction of numbers going into B&B.

9. New supply

9.1 New affordable housing

While efforts are being made to reduce the numbers in temporary accommodation, without a pipeline of new housing supply this will not resolve the housing pressures on the

Council. Delivery of new affordable housing must be a key corporate priority for the Council as this presents a significant risk to the Council's ability to manage the demands on the homelessness service. The Council's approach to increasing the provision of affordable housing is set out in the Strategy.

10. Staffing structure

The Housing Options Service carried out an interim re-structure in March 2018 moving away from a fully generic officer role and enables the Housing Register and Accommodation Team to operate separately. This has however placed increased pressure on the remaining generic housing options officers to largely carry out the introduction of the HRA, deal with triage advice on the frontline, in depth homelessness prevention, homelessness assessments and decisions and nominations into temporary accommodation.

This has resulted in a service that has lost a customer focus on the frontline and requires further re-structure in order to allow officers to effectively deliver a good homeless prevention service. The service is subject to a separate review of staffing and resources. The recommendations from this review will inform that process.

11. Resources

11.1 Use of additional Government resources for homelessness services

The Government has provided significant additional resources in order to support local authorities to deliver the Homelessness Reduction Act. The funding is designed to allow councils to be innovative and adopt a 'spend to save' approach to tackling homelessness at a much earlier stage when prevention activity is much more likely to succeed.

Table 16: Government resources to tackle homelessness

Government Grant	2018/19
Flexible Homeless Support Grant (FHSG) (ring fenced)	£197,520
Burdens Fund (ring fenced)	£87,495
Homeless Prevention Fund (non ring fenced)	£140,340
Discretionary Housing Payments	£403,738

The Council has effectively utilised some of its Burdens and Homelessness Prevention funding to recruit into fixed term housing options officer posts providing additional capacity for the team.

The Flexible Homeless Support Grant has been used predominately to cover the deficit created by the loss of the Temporary Accommodation Management Fee although there is no guarantee that this Government funding stream will continue indefinitely so this cannot be considered a long term solution.

Homelessness Prevention Funding is also used imaginatively by the team for prevention and is delivering results. In 2017/18 the team spent £35,245 on preventing homelessness for 44 households which is significantly lower per household than the cost of providing temporary accommodation for a lengthy period of time.

Good use is made of Discretionary Housing Payments (DHP) to prevent homelessness. Prior to considering a Homelessness Prevention Fund payment, officers consider whether the client could be awarded a DHP. In 2017/18, 709 discretionary housing payments were made using the total £482,106 DHP budget.

12. Consultation

12.1 Homelessness Forum

A Homelessness Forum was held in January 2019 attended by 40 representatives from local statutory services and the voluntary and community sector. A workshop was held to understand the challenges for Swale in terms of homelessness and to comment and agree on the key findings and priorities resulting from the Homelessness Review.

There was general support for the findings arising from the Review which reflected their experience of homelessness in Swale. Partners agreed the priorities and would particularly support actions relating to access to services, single homeless, rough sleepers, tenancy training, support for landlords, mental health and budgeting support.

The opportunity to meet together to seek solutions and develop initiatives was also supported and it was agreed that a regular Homelessness Forum meeting would be beneficial to all parties.

The feedback from the event will help inform the Delivery Plan which will form part of the wider Housing, Homelessness and Rough Sleeping Strategy 2019-2023 to be adopted during 2019. This Strategy will be the subject of formal consultation prior to adoption.

13. Conclusions

In conclusion, pressure on the Housing Options Service continues to present challenges especially in terms of managing customer demand, balancing prevention activity and the requirement to deal with the needs of those owed a statutory duty. The Homelessness Review has identified some good practice across the Housing service and some areas for improvement.

Demands on the service have resulted in an increasing number of households living in temporary accommodation with increased cost to the council. Numbers are likely to continue to increase and a pro-active approach to homeless prevention will be required.

The Housing Options service on the front line lacks customer focus and more can be done to change the culture of the team towards delivering a more open and pro-active approach allowing officers to develop specialist roles and lead on these for the team as well as making best use of new IT systems.

The Allocations Policy sets restrictive local connection criteria for the Housing Register and does not give sufficient priority to homeless households. A review of the Allocations Policy will help bring down numbers in temporary accommodation as will a focus on pro-active prevention and delivering new housing supply.

There has been good progress in developing new initiatives and work with private landlords in the area is delivering results albeit slowly. There is a well-established Landlords Forum and good links with private sector housing colleagues.

Operationally partnerships are good but more could be done to work with partners at a strategic level to build relationships and this could be achieved through holding a regular Homelessness Forum.

The number of rough sleepers is increasing rapidly and steps should be taken to agree more formal arrangements for periods of severe weather. The council could also seek to develop their relationship with both voluntary sector and faith groups to further support the work of the team.

While it is unlikely that any additional supported housing will be commissioned, there is a need to monitor support for both young people and people with complex needs who may fall through the net. A pro-active approach to early identification and prevention will support this as will close working with service providers and commissioners.

There is a mixed portfolio of temporary accommodation and while this is used effectively bed and breakfast is still used on a regular basis. Ending the use of B&B and significantly reducing the number of nightly let properties should be a priority. Officers are aware of the need to work more closely with housing providers in order to address this and an interim Recovery Plan is already delivering results.

14. Key priorities

The following will be key priorities to take forward into the Housing, Homelessness and Rough Sleeping Strategy:

- Promote early intervention and a more customer focussed homeless prevention service
- Develop strategic partnerships to address homelessness and rough sleeping in the borough.
- Ensure support is available for vulnerable households.
- Reduce the number of households in temporary accommodation.

Appendix one: Good Practice and other relevant links

MHCLG – Homelessness Code of Guidance

<https://www.gov.uk/guidance/homelessness-code-of-guidance-for-local-authorities>

Ministry of Housing Community and Local government – HRA Policy factsheets

<https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

National Practitioner Support Services – Gold Standard

<https://www.npsservice.org.uk/gold-standard>

Homeless Link

<https://www.homeless.org.uk/facts/our-research>

Shelter Good Practice guide for Early identification and Prevention

https://england.shelter.org.uk/_data/assets/pdf_file/0003/193134/Homelessness_early_identification_prevention.pdf

Crisis- 'spare to share' toolkit- developing shared housing

<https://www.crisis.org.uk/ending-homelessness/housing-resource-centre/for-local-authorities/how-to-set-up-shared-social-housing/>

Herts Young Homeless- good practice on young people's homeless prevention services

<https://www.hyh.org.uk/>

Centrepoint – More than a number – research on youth homelessness

<https://centrepoint.org.uk/media/2396/more-than-a-number-the-scale-of-youth-homelessness.pdf>

MIND – Brick by brick - A review of mental health and housing

<https://www.mind.org.uk/media/26223865/brick-by-brick-a-review-of-mental-health-and-housing.pdf>

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