

Centrepoint response to Ministry of Housing, Communities and Local Government consultation on 'A New Deal for Social Housing'

November 2018

Summary

- A step change in the delivery of social housing is needed to give homeless young people real housing options and access to a secure and affordable home. The Government should work towards an annual target of 90,000 additional social rented homes, and ensure that the needs of single homeless households are accounted for in any new delivery.
- The Government and social housing regulator must review allocations policies and guidance in order to tackle the barriers which leave young homeless people struggling to access social tenancies, and ensure that the actions of providers do not conflict with local and national homelessness efforts to reduce homelessness – using the Homes for Cathy commitments as a model of good practice.
- As part of efforts to tackle homelessness and improving housing security, the Government should ensure funding for tenancy sustainment support and advice for homeless people and other vulnerable groups living in social housing.

1. Introduction

1.1 Centrepoint is the leading national charity working with homeless young people aged 16 to 25. We are a registered social housing provider, a charity enterprise and a company limited by guarantee. Established nearly 50 years ago, we provide accommodation and support to help homeless young people get their lives back on track.

1.2 Every year, alongside our partner organisations, we work with over 9,000 young people, providing tailored support to help them address their support needs, with a particular focus on health, learning, and move on to independent accommodation in both the social and private rented sectors.

1.3 Social rented housing remains a major move-on destination for young people leaving Centrepoint's supported accommodation projects. However, a critical lack of social housing across much of the country, coupled with restrictive eligibility criteria and allocations policies mean that this is becoming an increasingly difficult route to take for many of the young people Centrepoint supports.

1.4 We welcome the opportunity to respond to this consultation and are happy to see that the Government is taking the provision and management of social housing seriously. We comment on each section below.

2. Part 1: Ensuring homes are safe and decent

2.1 For young people moving on from homelessness, access to a safe and decent home is essential for their health and wellbeing, and a good home is fundamental to helping a young person sustain employment, education or training. However, where homes are in disrepair and are of poor quality there is a risk of real detriment to a tenant's quality of life.

2.2 This quote from an ex-Centrepoint resident who was housed by a large housing association in the north east shows the impact that poor housing can have on a young person's wellbeing:

"I had to move out. It was a one-bedroom, and was falling apart. I've had three flats from [housing association] since I've been 18, and it's only this year that I've just decided to just give up with [housing association] and go private. I had wooden steps and they were cracked and the wood was coming away. I couldn't put carpet because they needed fixing but they were refusing to fix it. I had a massive crack above my bedroom window, there was some movement where the flat must have moved and they weren't going to fix that. It was just one problem after the other and I just couldn't cope. It was really bringing me down".

2.3 We support the green paper's proposals around improving the safety and quality of homes in the social rented sector. We think the following measures would also improve safety and standards enjoyed by residents:

- Comprehensive fire safety information and guidance should be given at the beginning of a tenancy, and refreshed as part of annual (or more regular) tenancy checks;
- Social landlords should ensure that vulnerable residents are identified and provided with adequate support, both in the event of an emergency and in terms of training and education around safety measures and procedures.

Q11. Should new safety measures in the private rented sector also apply to social housing?

2.4 Yes – however additional resource should be provided by Government to fund these safety measures, to ensure that this does not affect their ability to provide new social housing.

3. Part 2: Effective resolution of complaints

3.1 For vulnerable young people living in supported accommodation, access to a clear and effective complaints resolution process is essential to ensuring that any housing challenges or issues are dealt with. However, Centrepoint young people who have moved into social housing have reported feeling brushed off when making complaints and that they were not taken seriously due to their age.

"[Housing association] said they couldn't help out because the problems weren't major enough and wasn't putting us at risk. It had to be during the day and I'm doing an apprenticeship, I don't want to be taking time off work. One person would tell me that they could do it after work, they'd book an appointment and then no one would show up. I'd ring up and they'd say "oh we don't do after-hours, it has to be during the day", so it

was constantly back and forth. It was annoying us because one person was saying they could do after I could it after work and then the next minute they can't. It was constantly back and forth with them."

Q17. How can we ensure that residents understand how best to escalate a complaint and seek redress?

3.2 Complaints procedures should be explained through simple, easy to understand communications such as flowcharts and videos. Where residents may present as more vulnerable – such as formerly homeless young people – providers should ensure that housing officers and staff support them to understand procedures, and help them with any complaints or queries they have.

Q18. How can we ensure that residents can access the right advice and support when making a complaint?

3.3 Independent advice and advocacy services, such as Shelter and Citizens Advice, should be properly funded to provide support to residents living in social housing. Providers should ensure that residents are aware of these organisations through clear signposting and staff should inform residents of these options whenever they can.

3.4 For young people in particular, local youth services can play a role in advising young people of their housing rights and options, and wider education delivered through schools and colleges can also support people to understand such issues from an early age. The Government should explore the provision of housing education and advice for school-age children and young people, to help with independent living and help to prevent homelessness.

4. Part 3: Empowering residents and strengthening the Regulator

Q22. Are there any other areas that should be covered?

4.1 We would wish to see the introduction of a new key performance indicator, '*tackling homelessness and addressing housing need*' to assess the performance of social housing providers in supporting local and national efforts to tackle the housing crisis.

4.2 This key performance indicator, developed in partnership with local authorities, the third sector and the MHCLG would help to ensure that providers are adhering to the sector's key aim of supporting people to access and sustain secure accommodation. These indicators could be assessed using data on lettings and evictions, tenancy sustainment and nominations arrangements with organisations working with homeless people. Centrepoin would be happy to support the Government in the development of this key performance indicator.

Q23. Should landlords report against these key performance indicators every year?

4.3 Yes.

Q24. Should landlords report performance against these key indicators to the regulator?

4.4 Yes.

Q25. What more can be done to encourage landlords to be more transparent with their residents?

4.5 Landlords should engage with tenants and residents at every level of decision making, and should include resident representatives on appropriate boards and committees, committing to training and capacity building to support residents in this role. Where landlords accommodate young tenants, they should ensure that young peoples' views and opinions are considered in their decision making.

5. Part 4: Tackling stigma and celebrating thriving communities

5.1 Centrepont welcomes the Government's focus on tackling stigma and discrimination against people living in social housing. Much of the same stigma attached to social housing tenants extends to people on low incomes, people on benefits and homeless people more generally.

Q53. In addition to sharing positive stories of social housing residents and their neighbourhoods, what more can be done to tackle stigma?

5.2 Part of the stigma and negative attitudes towards people in social housing, and people receiving benefits, owes to a framing of the welfare debate and of people as 'scroungers' or 'strivers'. Campaigns like 'Benefit to Society' are much welcomed but the Government should do more to educate the public about the importance of the benefit system. Increasing the supply of social housing and improving access to a wider range of people will also help to tackle any stigma surrounding social housing.

6. Part 5: Expanding supply and supporting home ownership

6.1 Supporting local authorities to build more and helping housing associations and others develop more affordable homes

6.2 To ensure that young people moving on from homelessness have real access to a range of secure and affordable housing options, the government urgently needs to increase the supply of social housing across the country.

6.3 Previous research by Centrepont indicates that the shortfall of sub-market housing units required by young people will reach almost 150,000 by 2021¹, leaving young people stuck in insecure and unsafe housing arrangements, stuck in supported and emergency accommodation longer than they need to be, and at risk of homelessness and rough sleeping.

6.4 The Government should commit to the provision of at least 90,000 social homes, and increase investment to meet this requirement.² Recent announcements – the extra £2bn announced for housing associations from 2021/22 and the abolition of borrowing caps for local authorities with housing revenue accounts – are much welcome steps in the right direction, but alone are not estimated to meet the real scale of housing need. To support

¹ Clarke, A., and Gemma, B. (2012) Mapping the number of extra housing units needed for young people. Cambridge: Cambridge Centre for Housing and Planning Research

² 90,000 social rented homes is the figure identified independent analysis by Herriot Watt university, commissioned by Crisis and the National Housing Federation.

young people affected by homelessness into accessing a secure and sustainable home, the government needs to invest directly in the provision of homes for social rent.

6.5 As well as the need for additional social homes, the government should review current measures which are leading to a reduction in the existing housing stock. It is estimated that between 2012 and 2020, almost a quarter of a million social homes will be 'lost', either through Right to Buy, converted into 'affordable' rented properties or demolished as part of regeneration schemes.³

6.6 We are concerned that there has not been a one-for-one replacement of social homes sold through the Right to Buy, despite repeated assurances, and feel that the government should review the impact of this measure on the ability of homeless peoples' access to social housing. We do not feel that the government should expand the voluntary Right to Buy until significant headway is made in meeting the current levels of need for social rented housing, assessed by the number of people on waiting lists and levels of homelessness and rough sleeping across.

6.7 Improving the welfare system to help people struggling with the cost of housing

6.8 Centrepont is glad that this green paper has highlighted the concerns of residents around the impact of welfare reform on people's ability to access and sustain accommodation. Our own research highlights the impact of welfare reforms from the perspective of housing associations who see low benefit rates and specific welfare policies as major barriers to young people accessing social housing. 89 per cent of housing associations see lower benefit rates for young people as a barrier to them accessing social housing, while 79 per cent thought that the rollout of Universal Credit had made it more difficult for young people to access this kind of accommodation.⁴

6.9 We would encourage Government departments to ensure that particular welfare policies are not undermining its own strategies to reduce and ultimately eliminate homelessness and rough sleeping.

6.10 Ensuring we are using existing social housing efficiently for those who need it most

6.11 Recent research by Centrepont has shown the difficulties young homeless people face in accessing social housing.⁵ As well as an overall lack of social housing stock, many of the young people Centrepont supports struggle to access this accommodation due to allocations policies which do not see them as a priority, leaving them 'stuck' on the bottom of waiting lists with little chance of being offered a property.

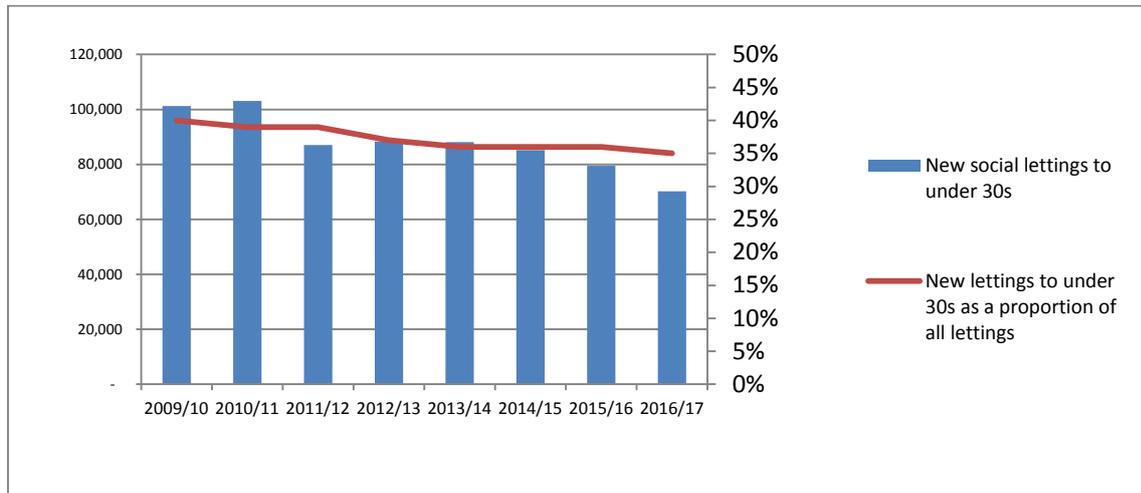
6.12 Analysis of CORE lettings data indicates that the number of lettings to households under 30, both absolutely and as a proportion of new social lettings has declined by a third in just eight years (see graph below).

³ CIH (2018) 'More than 150,000 homes for social rent lost in just five years, new analysis reveals' http://www.cih.org/news-article/display/vpathDCR/templatedata/cih/news-article/data/More_than_150000_homes_for_social_rent_lost_in_just_five_years_new_analysis_reveals

⁴ Harding, B, (2018) Ready to Move On. London: Centrepont - <https://centrepont.org.uk/media/3048/ready-to-move-on.pdf>

⁵ Ibid.

6.13 Staff in Centrepoin’s services also report that even young people who do enjoy greater priority in allocations policies, such as care leavers, struggle to access social housing due to an overall shortage of stock.



CORE lettings data – MHCLG

6.14 Centrepoin supports the proposed evidence collection exercise to better understand how the allocations framework is working across different areas, and would welcome the opportunity to provide evidence around the experiences of homeless young people in accessing social housing.

6.15 Young people with experience of social lettings and allocations report that their access to social housing seemed more dependent on luck than any clear and established procedure. The following quote from an ex-Centrepoin resident in London illustrates the challenges a young person can experience in dealing with the allocations system:

“It’s so long, and it’s such a frustrating journey. You go and view so many flats, I don’t know how many. Every week you go and view like three flats. Imagine doing that for a year and a half. Because you have to be first on the list. I was actually 7th for the flat I got, just nobody turned up. It was so lucky. I was the only that turned up so I accepted it. I could still be on the list now. You literally go in, and sometimes I didn’t want to look at the house because I knew I wasn’t going to get it. It was like a torture. You’re going in there waiting for people to come and you look at this flat with 10 or 15 people. You look at your name on the list and you’re like 10th or 11th and you’re not going to get it. And you have to say yes, even though you know you’re not going to get it. You feel like you’re wasting your time. If you’re sixth or seventh you could be there for years. You just don’t know how the system works.”

6.16 A general lack of understanding about how the allocations system works can leave the young people we support frustrated and confused. The case study below illustrates the impact this can have on vulnerable young people living in supported accommodation:

Taylor was a care leaver living in Centrepoin supported accommodation. He was offered a housing association property after bidding through the local authority’s choice based

lettings system.

He accepted the property but before he moved in he was told that his rent arrears were too great and the offer had been withdrawn. Taylor's arrears had come about after taking on more hours at work, which had in turn affected his claim for Housing Benefit.

The withdrawal of the housing offer left Taylor feeling 'shattered', affecting his wellbeing and causing him to disengage with support. He had been eager to move out and had told his friends about the new property. He was told he could bid again, as the local authority and housing association had different policies around rent arrears, but the exercise left him disheartened and impacted his mental health.

An inflexible approach to arrears, differing policies between providers and a lack of communication with applicants about these policies in this case left a vulnerable young person unable to access move on accommodation and had a serious negative impact on their health and wellbeing.

6.17 Alongside organisations including Crisis we would want to see a review of the use of affordability assessments and refusals on the grounds of previous behaviour or rent arrears.⁶ As the case study above illustrates, rent arrears can come about for reasons beyond a young person's control and if social housing providers do not take a flexible approach which takes into account an applicant's situation and history, vulnerable young people can be unfairly excluded from accessing secure and affordable housing.

6.18 We welcome the Government's decision not to implement the provisions of the Housing and Planning Act 2016 which would have replaced secure 'lifetime' tenancies with fixed-term 'flexible' tenancies for all new social tenants. Security of tenure is especially critical for young people who have experienced turbulent and difficult backgrounds, and it is positive that the Government recognises this.

Q193 How can we best support providers to develop new shared ownership products that enable people to build up more equity in their homes?

6.19 While we support the aspiration of homeownership and recognise that issues of supply and affordability put this out of reach for large numbers of households, we are concerned that the increasing focus on social landlords as providers of homeownership products risks detracting from the supply of homes for social rent. Social housing should not be regarded as a 'springboard into home ownership' but as a secure and affordable tenure for people on a range of incomes, with a focus on those in greatest housing need.

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⁶ Crisis (2017) Moving On. London: Crisis