

Research report

The Homelessness Reduction Act: Will it work for young people?



centre
point

give homeless
young people
a future



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Thank you to the local authorities who gave their time to this research, completing surveys and taking part in interviews.

Recommendations

Young people in receipt of a prevention or relief duty are at crisis point. With the right support and resources, homelessness can be resolved and prevented:

1. The Department for Work and Pensions should exempt from the shared accommodation rate all young people who have received prevention or relief support under the Homelessness Reduction Act to broaden access to the private rented sector.

This is crucial for those at risk of losing a tenancy because they can no longer afford it, and for those trying to access the private rented sector for the first time – including young people moving on from hostel accommodation.

2. The Ministry of Housing, Communities and Local Government should extend the list of agencies that have a duty to refer to include the police and further education institutions.

In some areas, particularly rural communities, Jobcentres and council offices can be located large distances from young people at risk of homelessness. The police and further education institutions play integral roles in their local communities and should be added to the list of local gateways to support.

3. The Department for Work and Pensions should introduce automatic alternative payment arrangements for all young people who have received prevention or relief support under the Homelessness Reduction Act.

This would provide landlords with reassurance when renting to young people who are claiming Universal Credit, and enable young people to focus on training and employment as they would not have to worry about managing their housing costs in the short to medium term.



Services provided by councils must be tailored to the needs of local young people:

4. Local authorities must include a commitment to support young people in their council wide homelessness strategy.

Supporting young people who are homeless or at risk of homelessness should form a key part of the homelessness strategy and staff should be ready and able to offer young person specific solutions and advice.

5. Local authorities must consult young people in the creation of age-appropriate advice and information on preventing and relieving homelessness.

It is crucial that advice and information produced by a local authority is done so in consultation with young people to ensure that it is tailored and accessible to them.

6. The Ministry of Housing, Communities and Local Government should conduct a review of council mediation services to examine the effectiveness and value for money efficacy of different approaches to achieving long-term improved family relationships.

Despite often being the main prevention route for young people at risk of homelessness, the availability of mediation - and approaches to it – vary between local authorities; and the evidence on what works and why is limited.

Local authorities need sufficient resources to fulfil their duties:

7. The Ministry of Housing, Communities and Local Government must provide tools and guidance to ensure uniform data collection across all councils so that the data can be used effectively.

This is essential in order to compare youth homelessness across areas and to determine the scale of the problem nationally and the funding to address it. This means providing local authorities with the infrastructure to implement the data guidance accompanying the HRA, including staff training to collect data accurately.

8. The government must ensure appropriate future funding for the Act is in place when the current settlement ends in March 2020.

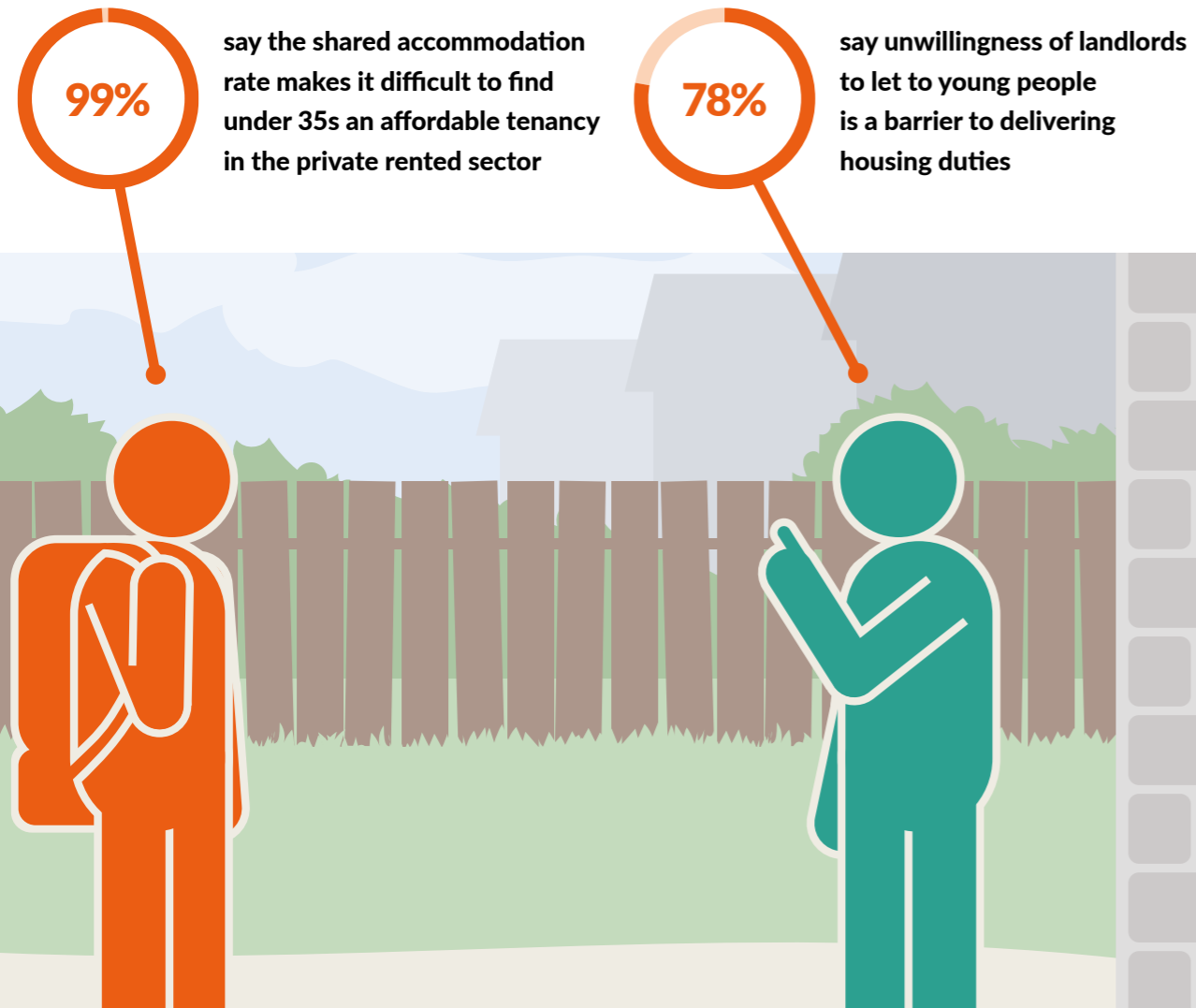
Central to delivery of the Act will be the ability of councils to plan and innovate in delivering homelessness prevention and relief. It is essential that councils do not face uncertainty or a funding gap at the end of the initial three-year financial settlement.

9. To boost funding for private rented sector access schemes, HM Treasury should allocate part of the revenue generated by the additional three per cent stamp duty on buy to let properties and second homes.

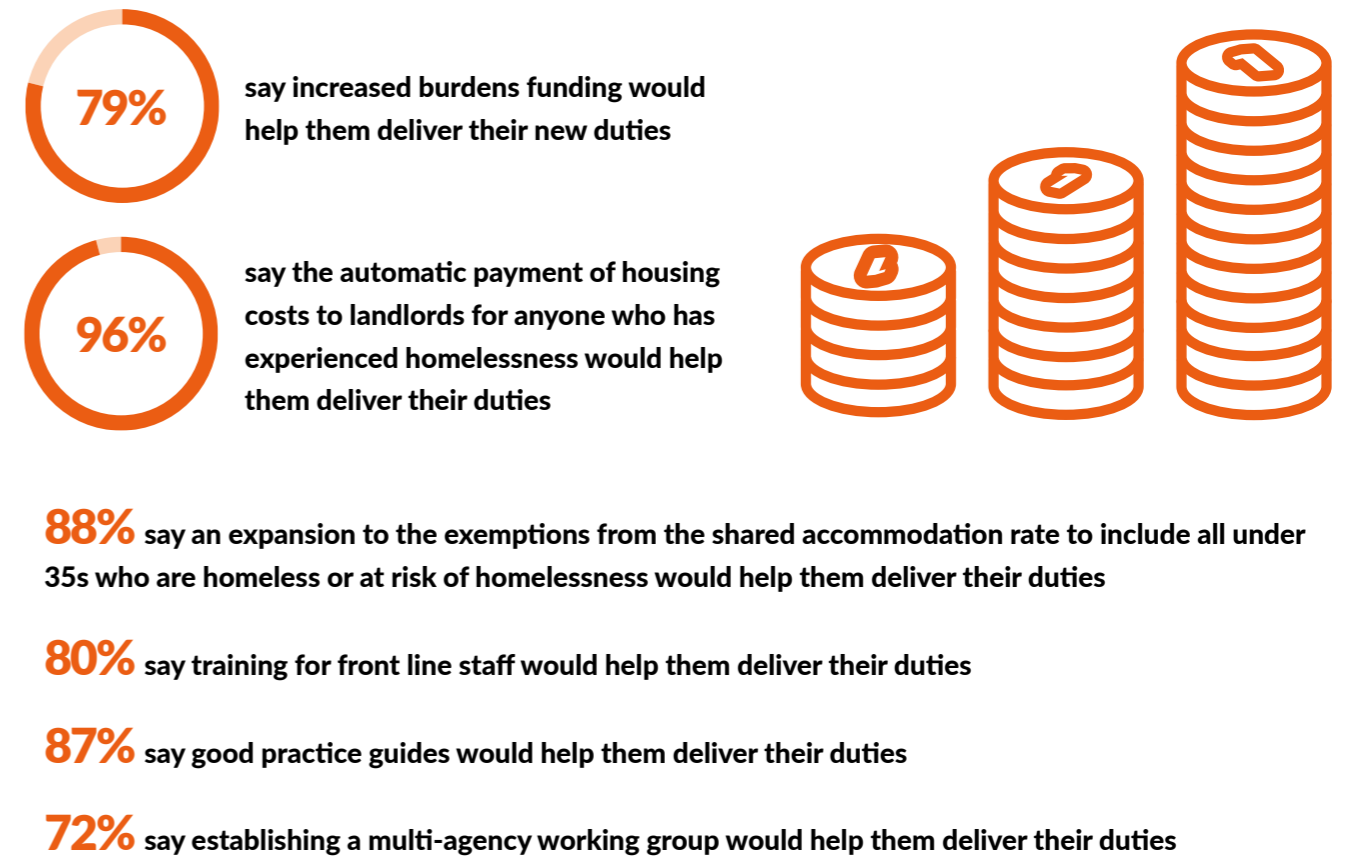
Analysis suggests that the 2015 stamp duty increase for those purchasing an additional home has generated more than double the expected revenue. By funding PRS access schemes the government could facilitate broader access to the private rented sector.

The key figures

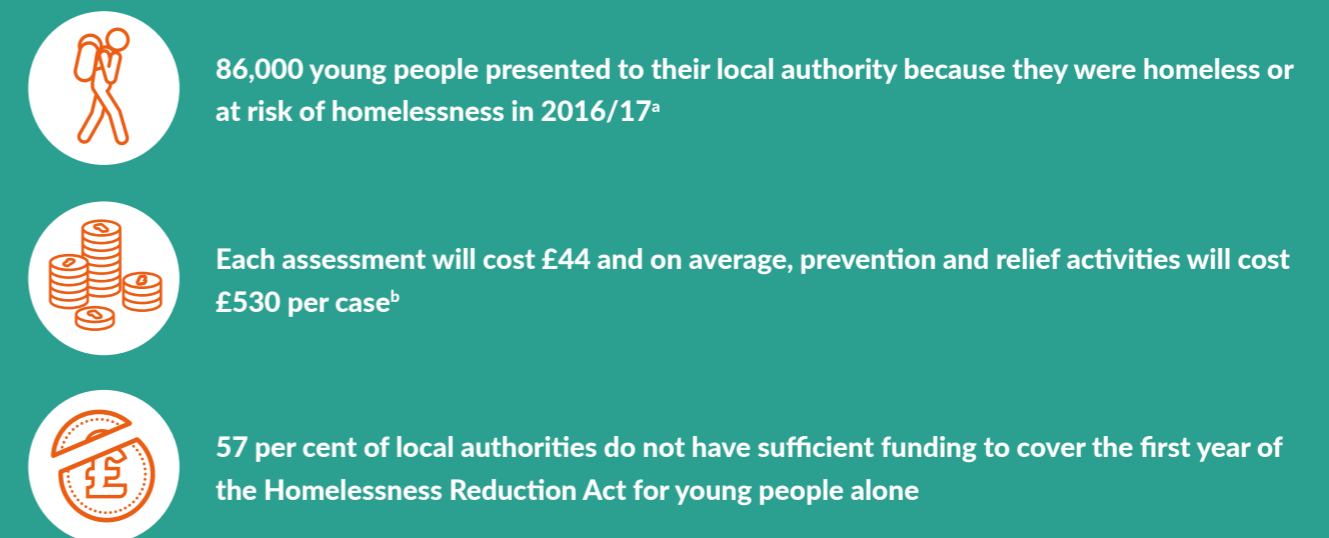
What do local authorities say are the barriers they face, prior to the Homelessness Reduction Act, in delivering their housing duties to young people?



What do local authorities say would help them to deliver their new duties under the Homelessness Reduction Act?



We analysed data on the number of young people presenting to their local authority alongside Homelessness Reduction Act funding allocations:



1. Introduction

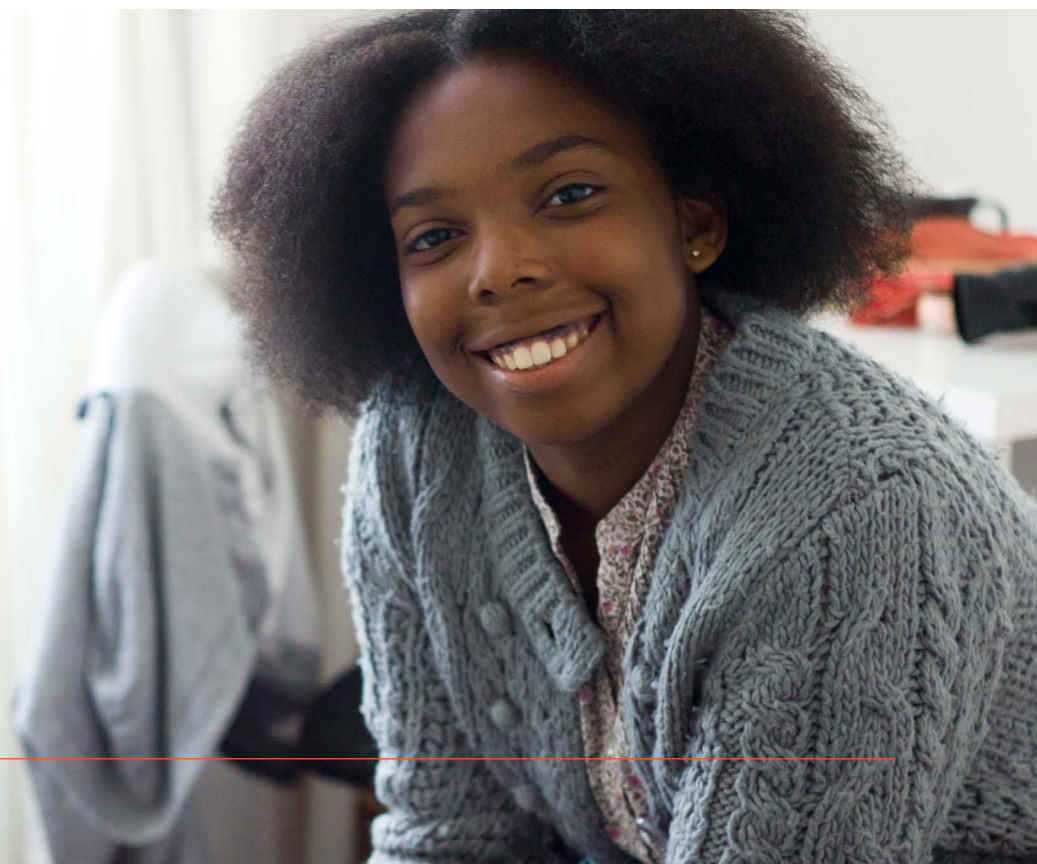
**“I think we have to be optimistic, it’s the Homelessness Reduction Act coming and for the right reasons”
– local authority**

With the introduction of the Homelessness Reduction Act, local housing authorities face more responsibility to support those who are homeless or at risk of homelessness than ever before. The need for additional support is high. Centrepoint estimates that in 2016/17, 66,500 young people approached their local authority for help because they were homeless or at risk of homelessness in England alone.¹ Only 33 per cent of these young people were recorded as receiving a documented assessment.

The Homelessness Reduction Act marks a turning point. The strengthening of duties owed to those presenting to their local housing authority means Housing Options teams must be prepared for a surge in assessments and subsequent support. It is also crucial that local authorities tailor their approach to the needs of young people specifically, as well as those who are deemed to be at particular risk, such as care leavers.

Through a national survey of local housing authorities and interviews, Centrepoint set out to examine the key challenges already present when delivering housing duties to young people and how this would change following the implementation of the Act.

The results highlight a strong sense of optimism, with many local authorities energised to make fundamental changes to their operations, culture and approach. They welcome the principles underpinning the Act and are already developing innovative approaches to put it into practice. However, they feel restrained by many factors which are beyond their control and will hamper the positive impact they hope to make. This includes the level of new burdens funding, the housing market and the welfare system. Local Housing Allowance restrictions in particular were cited by almost all authorities as limiting the support they can give young people to access a tenancy. Unless these issues are also addressed, there is concern that the potential positive impact of the Homelessness Reduction Act will not be fulfilled.



2. Youth homelessness in 2018

Centrepoint research suggests that around 86,000 young people approached their local authority in 2016/17 for help because they were homeless or at risk of homelessness in the UK.² Official data also shows that the number of young people aged 25 and under sleeping rough in England increased by almost a third between 2016 and 2017.³ Meanwhile, the youth unemployment rate is coming down, but still stands at 351,000 young people.⁴ Successive welfare reform policies have targeted this age group, including:

- **the Youth Obligation for unemployed 18 to 21 year olds on Universal Credit, which should include increased support but may also increase the risk of sanctioning**
- **a lower rate of housing support entitlement under the local housing allowance, with most people under 35 only entitled to the shared accommodation rate**
- **the removal of the automatic entitlement to housing support within Universal Credit for 18 to 21 year olds, and then the reversal of this policy**

The most common cause of youth homelessness is family breakdown; 69 per cent of Centrepoint young people note this as the reason they became homeless.⁵ A young person’s journey through homelessness may be chaotic and involve many unsafe situations. They are less likely to sleep rough than older groups, but often experience ‘hidden homelessness’.

“Young people often come to the local authority, then fall off the radar, then come back two to three months later. Young people tend to have been here, there and everywhere – sofa surfing, staying with relatives, staying with family members, then back to us again”

– local authority

Young people may rely on wider networks for support and only seek external support once they have exhausted the hospitality of friends. They may not identify as homeless and so might not necessarily seek help as soon as they leave home. For many young people, becoming homeless will signify the first time they have left the family home. They may never have lived independently before, may lack independent living skills and might not have the financial resources needed to set up a home. Due to this, homeless young people need more than just a roof over their heads.

“[We are] also seeing increasingly more complex needs, and lots of mental health issues. It feels like it is a knock-on effect from other services being cut and limited resources among other services: people are not getting the support they need and so things are failing. Homelessness is the outcome”

– local authority

3. The Homelessness Reduction Act 2017

The Homelessness Reduction Act 2017 (HRA) came into force on 3 April 2018. Originally a private members' bill introduced by Conservative MP Bob Blackman, it later gained governmental backing enabling its safe passage through Parliament.

The 2016 Crisis campaign 'No One Turned Away'⁶ found that a number of people approaching their local authority due to homelessness or risk of homelessness were being turned away without any meaningful support. In response, the charity convened an expert panel to advise on a new legislative framework for single homeless people.

Taking inspiration from the Housing (Wales) Act 2014, which introduced new duties on local authorities to prevent homelessness through earlier intervention (within 56 days rather than 28 days of homelessness), and jointly devised Personalised Housing Plans, the expert panel submitted a report to government for consideration.⁷ This report formed the basis of the Bill.

The aim of the legislation is to shift local authority response from one of crisis support to prevention and create a statutory right to support for every person experiencing or at risk of homelessness regardless of their priority need status.

This report will focus on five key aspects of the HRA to examine how they might affect homeless young people. This includes; improved information and advice, the duty to prevent homelessness, the duty to relieve homelessness, joint working and the duty to refer, and assessments and personalised housing plans.

4. Methodology

This research sought to take stock of the challenges already faced by local housing authorities in delivering existing housing duties to young people, in their own words, and what they foresee as the impact of the Homelessness Reduction Act.

In order to do this, a national survey of local authority housing practitioners was conducted between December 2017 and February 2018. Representatives from 117 local housing authorities responded, accounting for the voice of 37 per cent of English local authorities. The survey received a fair response across different regions and both urban and rural areas, giving good insight into the situation across the nation.

Alongside this, 10 in-depth interviews were conducted with Housing Options managers between December 2017 and February 2018. This included team leaders, managers and heads of service. The sample consisted of people who had completed the survey and volunteered to be interviewed as well as existing local housing authority contacts. In addition, three short focus group discussions were conducted at regional/sub-regional forums attended by Housing Options managers in Greater Manchester and London. In total, six local authority representatives attended the focus groups in London along with several Registered Providers (Housing Associations) and representatives of sub-regional partnerships.

Seven local authority representatives and the Greater Manchester Combined Authority attended the Manchester discussion.

Alongside primary research, we also analysed the new burdens funding assigned to each local authority to support the implementation of the HRA. We used data collected for Centrepoint's Youth Homelessness Databank to estimate how many more assessments and prevention and relief support programmes local authorities would have had to have undertaken in 2016/17 if they were abiding by the new HRA duties. The Youth Homelessness Databank contains complete data on this for 143 of the 326 local authorities in England. We were then able to estimate the financial impact of these increased activities using costs assigned to each activity in the government's new burdens fund allocation methodology.

This report is structured around the changes which will be brought in with the implementation of the Homelessness Reduction Act as well as factors contributing to youth homelessness which are beyond its remit.



5. The Homelessness Reduction Act: will it work for young people?

Improved information and advice

The Homelessness Reduction Act extends and strengthens existing advice and information provision, by placing a duty on local housing authorities to provide free information and advice on preventing and relieving homelessness and the available help. This should be designed with certain vulnerable groups in mind including care leavers, victims of domestic abuse and those released from prison.

In order to prevent or relieve homelessness, young people need to know when and how to access advice and information. However, we know that this is sometimes not the case, based on our experience of accommodating and supporting homeless young people. In 2017 we established the Centrepoint Helpline in response to this. Too often, young people are being turned away from local authorities without sufficient information or advice, or information which is out of date. We also find great variation in the format and quality of information given by different local authorities.

“Some [local authorities] don’t even have a housing unit, some are in a library and some you can’t even speak to someone in person... there is a lot of confusion... every single place is different”
– Centrepoint helpline staff⁸

Prior to the implementation of the HRA, those not owed the main homelessness duty would generally not be entitled to advice and information. The HRA now places a duty on local housing authorities to provide free information and advice which must meet the specific needs of people in the area including vulnerable groups such as care leavers.

When a young person approaches their local authority, the processes around access to services should be clearly explained and local authority housing staff should check that the young person understands. It is not enough to give young people a generic leaflet with information about services neither appropriate nor accessible to them. It is crucial that the advice and information given is accessible to all young people, not just the specific groups highlighted in HRA guidance. The information should be tailored to the needs of young people, signposting them to support that is appropriate to that age group. To ensure this, content should be produced in partnership with young people and the information must be reviewed on a regular basis to ensure it is up to date.

The research highlighted that work is already being done by some local authorities to ensure this is in place. One local authority explained that they are using trailblazer funding to create a website for young people, developed in line with what young people say they would like to see included.

The duty to prevent homelessness

The Homelessness Reduction Act introduces a prevention duty and extends the period an applicant is ‘threatened with homelessness’ from 28 to 56 days. This means that local housing authorities have a duty to take reasonable steps to help prevent any eligible^c person who is at risk of homelessness from becoming homeless, up to 56 days before they are likely to become homeless. Crucially, the Homelessness Reduction Act stipulates that help should be provided to all eligible individuals, not just those in priority need.

It is clear that the extension of the period of at risk of homelessness to 56 days will be a lifeline for many, particularly those served with a section 21 eviction, which should include at least two months’ notice. However, the timeframe within which homelessness may occur will not be quite so clear for young people experiencing family breakdown.

Centrepoint research highlighted the plethora of factors which can push family relationships to breaking point; including poverty, unemployment, overcrowding, involvement in criminal activity, poor mental health and poor resilience.⁹ These risk factors could make it be possible to identify families vulnerable to family breakdown at some point, however it is more difficult to predict when and if these issues will definitely lead to homelessness. The complexity of the situation will likely mean that a family will need help with more than just housing and for longer than 56 days.

“It will change significantly in certain areas, as lot of YP have just been turned away [by] some councils quite close by here, who would just have given a non-priority need letter saying we have no duty, go away”
– local authority

Local housing authority professionals discussed the approaches currently taken to prevent youth homelessness. Initially, the aim is often to support the young person where they are currently living, if it is safe to do so. Mediation and conciliation are suggested reasonable steps that the housing authority might take to prevent or relieve homelessness.¹⁰ Mediation is often a first step when a young person presents as homeless and is

currently living at home. Our research, alongside wider evidence, highlights different interpretations of what mediation is. Some interviewees had commissioned mediation services in the past; a few still commissioned or spot-purchased mediation services but the majority commented that the type of mediation required by a Housing Options service is very specific and they felt it is best done internally by housing officers.

70 per cent of local authorities surveyed currently use mediation to prevent homelessness.

“Mediation is not a specific service; it’s in the remit of the officers... Basically helping the family understand the reality of finding somewhere to live... [to see] if they are willing to wait a bit longer [before the young person has to leave]. It’s as much about informing [people]”
– local authority

There is a difference between mediation and conciliation which, from the research, is what many housing professionals undertake. Successful mediation should never be measured by whether a young person returns home. Mediation should be objective, and the mediator should not have a vested income in a particular outcome (i.e. returning home). It is difficult to see how the local authority could maintain this objectivity. The aim of mediation should be to repair relationships, even if that means that the young person does not return home.

Family home visits, which enable housing practitioners to act as intermediaries, were cited as a key prevention tool with 76 per cent of local authorities using home visits to prevent youth homelessness. Housing professionals pass on information to the family, ensuring that all family members understand their options and the consequences of their decisions. Where necessary they may work with the family to support the young person to leave in a planned way.

“Housing officer works with the family for a planned move, rather than the young person turning up at the local authority at 3pm, saying they’re homeless”

– local authority

While mediation and conciliation may be suggested reasonable steps, it is unlikely that this alone will prevent homelessness. It is difficult to rebuild relationships if the underlying issues faced by a family are still there.

Where a young person does need to leave the family home quickly, it is vital that emergency accommodation is available immediately for respite. Where an applicant is sleeping rough, or is at imminent risk of sleeping rough, local authorities can use discretionary powers to secure emergency accommodation.¹¹ Local authority housing professionals explained that emergency respite accommodation is crucial in removing a young person from a difficult home environment. Local authorities want to offer more of this accommodation, however only 23 per cent of local authorities surveyed currently do.

60 per cent of local housing authorities would like to commission respite services were additional funding available.

“We used the Homelessness Prevention Grant to fund a crash pad. We changed the mindset to helping young people to stay at home as much as possible so working with mum and family. This does not always work – for example mum needed space - hence the crash pad”

– local authority

When a young person faces homelessness due to the loss of a tenancy, local authorities focus on resolving issues with rent. To prevent youth homelessness, 96 per cent said they currently resolve housing benefit problems and 91 per cent support young people to resolve arrears. This work will continue to be key under the HRA.

“There are one or two initiatives where we are targeting landlords, partnering up with DASH^d and calling it ‘Dial us before you serve’ or ‘call us before you serve’”

– local authority

Overall, the focus on prevention, which the HRA will encourage, marks a hugely positive shift in our approach to tackling homelessness. There was wide variation in how interviewees believed the HRA would impact on their provision. Local authorities that currently focus on prevention felt that change is likely to be fairly minimal and some have already progressed implementation or are at that stage. At the other end of the spectrum, there were areas where a young person would have been unlikely to see a Housing Options officer at all, but will now get an assessment and a personalised housing plan thanks to the HRA.

The duty to relieve homelessness

The Homelessness Reduction Act introduces a duty to relieve homelessness whereby local housing authorities must take reasonable steps to help any eligible person secure accommodation regardless of whether they are priority need or not. Local housing authorities are required to take reasonable steps for (though not limited to) 56 days to help relieve homelessness. Any accommodation that an individual is helped to secure should be available for at least 6 months. This does not replace the main housing duty, which is still only applicable to applicants who are eligible, have priority need and are not homeless intentionally.

The duty to relieve homelessness centres upon helping an applicant to secure accommodation. With regards to young people, the crucial issue remains the availability of suitable accommodation which meets their needs and provides support where needed.

86 per cent of local authorities do not think there is enough accommodation in their area suitable for young people with high support needs.

HRA guidance is purposely open in terms of what constitutes ‘help to secure’ as some applicants will require more support than others and in different ways. The young person may not be owed the main housing duty but the local authority should work with them to agree reasonable steps that the applicant and the authority can take to identify and secure suitable accommodation.¹² Ultimately however, the onus is still on the young person to secure accommodation within this period. For vulnerable homeless young people who may not have the financial or moral support of a family, this may feel like an incredibly daunting task and they will need extra help and patience from housing professionals. If this is not in place, they may be set up to fail in securing accommodation.

68 per cent of local authorities surveyed thought that a lack of supported accommodation was a barrier to fulfilling their current housing duties to young people.

Local authorities believed that the availability of suitable housing poses a major barrier to them fulfilling the relief duty in securing housing for at least six months. They explained that supported housing is often the preferred housing option for young people, as it enables support to be put in place, to address the needs they may have, some of which will be complex. However, over two thirds of local authorities thought that a lack of supported accommodation is preventing them delivering their existing housing duties, even before the new HRA duties are taken into account. A quarter (26 per cent) stated that this was the single biggest barrier faced. The problem is particularly acute in rural areas, with 79 per cent of rural local authorities saying that the lack of supported accommodation is a barrier to delivering their housing duties, compared to 57 per cent of urban authorities.

Sufficient, high quality, supported accommodation is crucial to ensuring the HRA works for young people. The guidance stipulates that the local authority should work with relevant providers to promote sustainability where an applicant’s needs may put them under further threat of homelessness. This is absolutely essential in ensuring vulnerable young people are not put at risk of becoming intentionally homeless because they do not have the support needed to manage a tenancy.

Given the importance of supported housing, it is concerning that the current review of supported housing funding has created uncertainty which risks undermining the intentions of the HRA. Housing professionals outlined the negative impact that cuts to supporting people funding has already had on supported accommodation, meaning that providers

are faced with choosing between the most vulnerable young people, based on their age. One authority described having to serve notice to young people aged 18 to 21 in order to accommodate young people under 18.

Joint working and the duty to refer

The Homelessness Reduction Act places a duty on a range of public authorities to notify a local housing authority of those they think may be homeless or at risk of becoming homeless, commonly known as the 'duty to refer'. The public authority must have the consent of the individual before they refer. This duty promotes good multi-agency working and encourages all public authorities to consider the housing needs of those they support. How this will work in practice is arranged locally, with minimal directive from central government, but examples are given such as protocols between services.

Given that family breakdown is the main cause of youth homelessness, encouraging public agencies to work together is a hugely positive step. The nature of family breakdown means that it is likely that a family might be known to and supported by some public agencies. Three quarters (72 per cent) of local authorities surveyed thought that multi-agency working groups would help them to deliver their duties.

Interviewees highlighted the need to reach out to young people and their families through a range of services, which some already do through a wide range of existing joint working with statutory and voluntary sector services and housing providers.

When asked which agencies the local authority housing team currently works effectively with, 96 per cent said homelessness organisations, followed by welfare/ debt advice agencies (89 per cent) and housing benefit teams (also 89 per cent). In contrast, only 32 per cent of local authorities felt they currently work effectively with NHS services and 35 per cent work effectively with Jobcentre Plus. This is highly concerning given the complex needs of homeless young people in relation to health and benefits access.

Many of the local housing authorities interviewed already have strong links with local agencies, including children's services, local housing charities, the police, the NHS, schools, and advice and information providers such as Citizen's Advice.

"I am quite fearful and nervous about supported housing funding, as if that changes for the worse, that model is gone. We are nervous about what might happen. Supported is one of the only routes out [of homelessness]"

– local authority

They referred to local forums as a mechanism for linking up with local agencies, as well as outreach whereby housing officers attend services hosted by other agencies to support their service users and also the physical co-location of services to create one-stop hubs.

"The local authority has an early help hub; about 20 agencies are running from that pretty well developed hub. Children services are based in local authority offices, we have also been talking to housing associations and working on discharge with hospital. Most schools tie into the early help hub and a lot of the referrals into that come from schools"

– local authority

Creating a comprehensive network of services is dependent on available resources and local need, but it is also affected by location. Housing professionals working in rural areas highlighted the difficulty in reaching young people in these areas; which leaves scope for online and digital solutions:

"I don't think we get a great deal of footfall as we are smack bang in the middle of [rural district]. Often young people send us an email or use our website-based service and give us a ring back. People know where to come but we don't get the footfall"

– local authority

It is hoped that current joint working will only be strengthened by the duty to refer, ensuring that housing departments are made aware of individuals who are at risk of homelessness. Several interviewees gave an overview of the way their services would change with the introduction of the HRA and how they have been preparing, centring on culture shift towards working better together. One local authority described trying to get all agencies to adopt the mantra – 'homelessness is the unacceptable outcome' – which has been positively received and is raising awareness.

Some local authorities had also employed additional staff, formed new protocols and referral mechanisms, developed new hub models or co-located services. One local authority had designed a new referral form in partnership with all agencies. The HRA has also encouraged housing professionals to think about an applicant's wider needs and to put a more holistic package of support in place through their personalised housing plan.

"A person's mental health plan can be part of a PHP (personalised housing plan). Excited about the potential of this for people coming in... so for a young person thrown out [of home] because they are not addressing a mental health need, their PHP will work to address this... We [Local Authority] are really small... so let's force the other agencies to work with us - and this has been well received"

– local authority

While the new duty to refer has undoubtedly bolstered an ethos of joint working, there are concerns that the police and further education providers are not included in the list of public agencies subject to the duty to refer.¹³ This is especially concerning in rural areas, which may have a limited number of services locally, but will have police and colleges. Agencies that cannot fall under the duty to refer as they are not public bodies, for example GPs, should voluntarily seek to build relationships with local authorities to prevent youth homelessness. It is essential that they all develop strong relationships with the local housing authority, regardless of not being subject to the duty.

A further point of concern was the lack of clarity around the implication for agencies which have a duty to refer but do not. Or that other, equally stretched, agencies may use it to pass on responsibility to the local housing authority. It is hoped that other agencies continue their own work in ensuring that young people do not reach the point at which they are at risk of homelessness and need to seek help from their local authority. To adhere to the spirit of the legislation there should be a shift in culture so that all agencies consider the prevention of homelessness as part of their remit.

Assessments and personalised housing plans

The Homelessness Reduction Act introduces a requirement that local housing authorities assess all eligible applicants who are homeless or at risk of homelessness. They must then work with the applicant to agree actions and ensure the person is able to access and sustain accommodation. The aim is to ensure that the needs of vulnerable claimants are met by a plan which is individualised to those needs.

Recent research by Centrepoin estimated that three fifths of young people (58 per cent) who approached their local authority for housing help in 2016/17 did not receive any recorded support i.e. prevention and relief, or being accepted as statutory homeless.¹⁴ The new duty means that all young people who are homeless or at risk of homelessness should be assessed by their local housing authority. This assessment should explore the circumstances that caused them to be homeless or threatened with homelessness, their housing need and the support necessary. Some young people who come to Centrepoin for support say that they did not feel listened to by their local authority when they approached them for help:

“When I was 16 and I was homeless, I presented at the housing department on several occasions. Because I was 16 they said they had to phone my parents to check that I was actually homeless. But my parents would say that I could come home. Then when I got home I wasn’t allowed in. So it was a no-win situation. I had to just constantly go back to them and finally they stopped calling my parents”

– Jay, young person¹⁵

The guidance reminds local authorities that applicants should be encouraged to share information without fear that this will reduce their chances of receiving support. Questions should be asked in a sensitive way and with awareness that the applicant may be reluctant to disclose personal details if they lack confidence that their circumstances will be understood and considered sympathetically.

Alongside the assessment, local authorities have a duty to develop personalised housing plans in partnership with the applicant. Many young people have complex needs which will require a tailored and flexible approach. These support needs may be multifaceted and challenges range from independent living skills and opportunities to more complex needs such as mental health, leaving care and addiction. With this in mind, local authorities must ensure that personalised housing plans are realistic, measurable and achievable for each young person. If not, there is a risk that young people will be penalised because they have not understood their PHP or it was never achievable. Young people should never be set up to fail.

“I think [PHPs] are a really, really good thing! We won’t just ask a customer to do something; we have to assess the support they need to do that... We have that young person here now, they need to open that bank account or put in for UC now, we need the worker in NOW... we think one of the big changes is there is more onus on the staff to do more, there needs to be a little bit more hand holding”

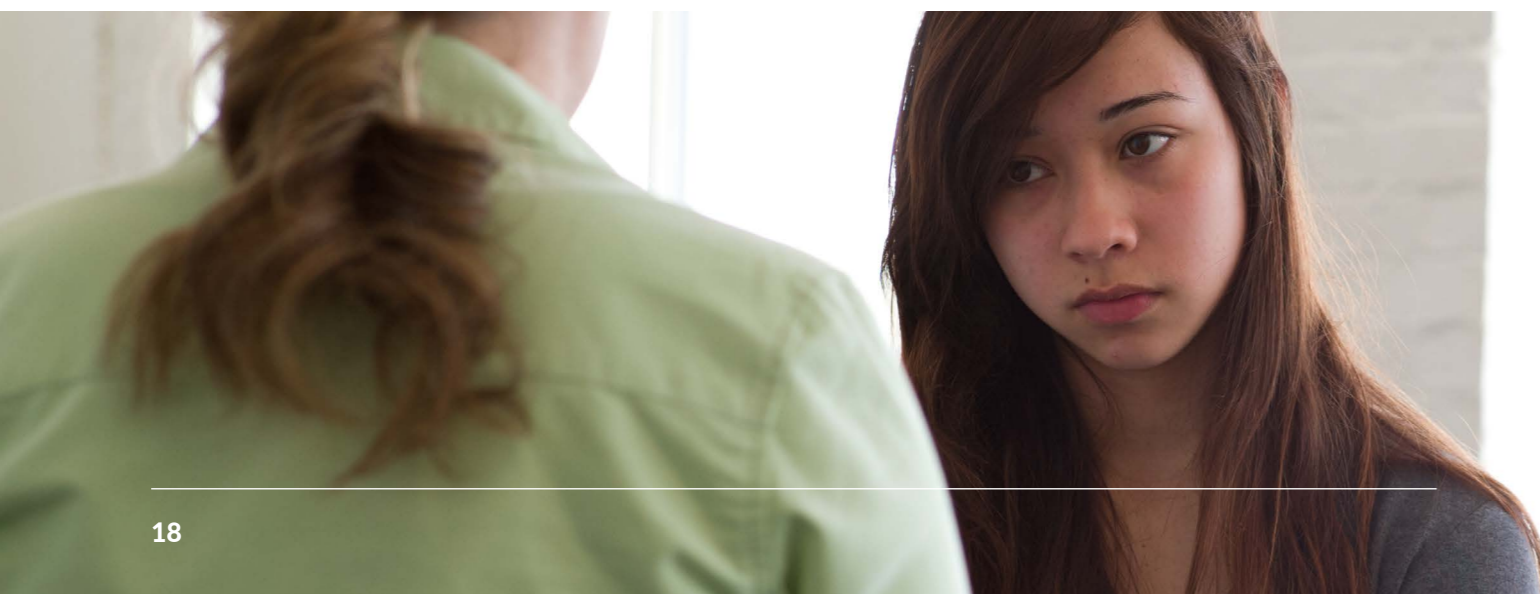
– local authority

The HRA also sets out actions a local housing authority can take if a young person deliberately and unreasonably refuses to cooperate with their personalised housing plan. This clause should not punish those who have difficulty cooperating and a number of safeguards have been built in, such as a warning letter explaining that the local authority will take further action if they continue to deliberately or unreasonably fail to cooperate. However, the needs of some young people may be such that a formal letter is not the best means of communication, so local housing authorities should endeavour to keep in touch through other channels such as by text, and be sure young people have received the communication. Ultimately, the local authority can bring the relief duty to an end if a suitable offer of accommodation has been made, the young person has been notified of the consequences of refusal, but still refuses the offer. It is hoped that local housing authorities will use their discretion when supporting vulnerable young people who will need extra support to understand the consequences of refusal.

“I would be reluctant to go down route of ‘non-cooperation’ to end a duty. If you are already thinking like that you have probably missed the point about how hard life is for young people... We would want to understand; is the plan not right? Have they agreed it because they think they should?... But some local authorities will take the hard line and they will be successful”

– local authority

Overall, interviewees had a broad consensus about what reasonable steps might include, many referring to agreements made in mediation for example contributing towards living costs. This could also include taking action to make or keep a benefit claim, actively looking for private rented shared accommodation, or taking the necessary steps to secure supported housing if necessary.



Implementing the Homelessness Reduction Act: remaining challenges

The Homelessness Reduction Act marks a crucial shift in how homelessness is tackled, with a welcome focus on prevention. It is the result of years of campaigning by the homelessness sector, underpinned by the work of an independent panel of experts led by Crisis. However, there are wider contextual issues which threaten to undermine the potential positive impact of the act.

Financial challenges: will funding meet demand?

There are widespread concerns about the additional funding allocated to local authorities to fulfil the new Homelessness Reduction Act duties. Overall, interviewees did not believe that the new funding allocated to their local authority came close to meeting what would be needed to implement the requirements of the HRA. Several interviewees commented that the funding might meet the costs of the new systems required but not much or anything else.

“We have new burdens funding but given the number of staff we need to increase the team by and the other IT issues it doesn’t even cover an extra member of staff. A lot of money is being input from the existing budgets - hence the need for briefing session for elected members”
– local authority

Centrepoint estimates that 86,000 young people approached their local housing authority for help in 2016/17. This estimate is based on responses to a freedom of information request sent to all local authorities in England. The data collected also provides an insight into the scale of the increased demand that local authorities may face following the implementation of the HRA.

In total, 143 local authorities provided comprehensive and coherent data on the number of young people presenting as homeless, or at risk of homelessness, to their local authority as well as figures on assessments under the Housing Act 1996, acceptances as statutorily homeless and prevention and relief support.

This data shows that two thirds (67 per cent) of young people who presented as homeless or at risk across these 143 local authorities in 2016/17 were not given a documented assessment. Furthermore, almost six in 10 (58 per cent) young people approaching their local authority for help left the interaction with their local authority without any meaningful, documented support. Under the HRA, every eligible young person should be assessed, and subsequently given support to prevent or relieve their homelessness.

The government has allocated £72.7 million over the course of three years to fund the increased burdens local authorities will have under the HRA. Each local authority has been allocated an annual fund for each of the first three years of increased activity starting in 2017/18, one year ahead of the implementation of the HRA.

In deciding these allocations, the Ministry for Housing, Communities and Local Government (MHCLG) estimated indicative costs for each activity. MHCLG’s methodology note concludes that each housing assessment will take two hours and, on average, will be completed by a member of staff costing the local authority £22 per hour.¹⁶ Each assessment, therefore, is estimated to cost the local authority £44. The same calculations assign a cost of £530 on average for prevention and relief activities, per case.¹⁷ Using these assumed costs and the data collected through the freedom of information requests, it is possible to understand how fit for purpose the HRA new funding allocations are.

57 per cent of local authorities do not have sufficient funding to cover the first year of the HRA.

In 82 of these 143 (57 per cent) local authorities for which data has been collected, the additional burdens funding for year one would not be enough to cover the estimated number of assessments and subsequent prevention and relief support for all the young people who presented but did not receive an assessment, assuming that all those presenting are eligible for support.

This shortfall comes to £6,028,581 in these 82 local authorities alone, which is 1.7 times *more* funding than already allocated to these areas.

Worryingly, this means that over half of local authorities will not have enough funding to cover the assessments and support of *young people alone* with their current funding settlement. This is before they work with anyone over the age of 25 who is now owed an assessment or put funding behind any additional priority need cases that arise from these assessments.

Additionally, this is also before considering any increase to the total caseload as people become aware of the increased efforts of local authorities to help prevent or relieve homelessness. In these 82 local authorities, therefore, there would not be any resource to begin to deal with any new cases, of any age, on top of the 2016/17 levels of young people presenting.

Our analysis reveals which areas will have the biggest shortfall in funding:

- **Manchester would need an additional £318,464 on top of the allocated £164,470 to cover the 701 additional assessments of young people and the 852 additional prevention and relief caseloads that would come with assessing and supporting all those who presented.**
- **County Durham would need an additional £285,070 on top of the allocated £131,178 to cover the 932 additional assessments of young people and the 708 additional prevention and relief caseloads that would come with assessing and supporting all those who presented.**
- **South Ribble has the worst ratio of funding allocated to funding needed. The additional burdens for year one awards the local authority £11,317 but the 296 assessments and 166 more prevention and relief support cases they would have had to carry out if the HRA was implemented on 2016/17 figures means that they would have needed £101,004 in total. This is nine times the funding they have been given.**

In order for the HRA to be effectively implemented it is essential that further resource is directed to local authorities based on evidence of need. The government has promised a funding review after two years.

Internal challenges: are local authorities ready?

Interviewees talked about the measures they had taken to prepare for the HRA, which included implementation plans, training, staff workshops, examining case studies, reviewing policies and procedures, reviewing websites and implementing new IT systems. This preparation had been a lot of work and very demanding on teams as they continue to deal with their day-to-day service delivery, however the majority of local authorities (51 per cent) did feel that they had had sufficient time to prepare for the HRA.

There is a sense of uncertainty even among those who have undertaken extensive work to transform

services in line with the HRA. One interviewee commented that they didn't know whether more temporary accommodation would be needed, another said they are unsure how long cases will remain open and how they will be closed, and there was widespread uncertainty about how far both demand and administrative burdens may increase.

“I don't think any local authority is comfortable with it [HRA] - it is the unknown additional quantity walking through our doors, I honestly don't think that we will be prepared”

- local authority

Data and IT systems

Until now, data collected by local authorities and reported by central government has only given a limited snapshot of youth homelessness, focussed on statutory homelessness. There has been criticism of this data, with concerns raised about a lack of coherent narrative to the data and the generalisations drawn in terms of a reduction in homelessness, when the data actually shows a reduction in statutory homelessness, i.e. those accepted.¹⁸ Centrepoint research also highlighted discrepancies in how local authorities approach data collection, inconsistencies in data and most worryingly, some local authorities not collating data by age in order to disclose the level of youth homelessness in their area.¹⁹

The introduction of the Homelessness Reduction Act is a juncture which provides the opportunity to improve the quality of data on youth homelessness. MHCLG have set out clear guidelines on data collection and has introduced updated software (DELTA) to ensure cohesive data submission across local authorities. However, for data to be submitted cohesively, it also needs to be collected cohesively, and at present local authorities can continue to use their own collection methods which may leave scope for variation.

Interviewees generally believed they have good technical solutions in terms of personalised housing plans; IT systems developed in the private sector had greatly aided their work in preparing for the HRA.

“We choose the package design based on the one with the plans (we liked)... One of the main reasons we went for [this one] was the PHPs; they are interactive and web based... there is a customer portal, they can log on... The applicant is able to confirm they agree to it (PHP) online. There are bullet point actions which are easy to read, not lengthy paragraphs of information. You tick to say an action is completed or message to say there's an issue. If one of their actions is they need to provide proof of benefit, they can take photo and upload onto the system - interactive, can take photo on a smartphone”

- local authority

Training and guidance

While extra funding to be used on improved IT was welcome, interviewees commonly mentioned the need to expand the size of their team and their team's expertise. Some areas benefited from Trailblazer projects and other grants which assisted them in growing their team. However, there was a frustration that the funding allocated to Trailblazer areas will be considerably higher than funding allocations to all local authorities once the HRA is rolled out, and so they may struggle to deliver the results achieved in Trailblazer areas.

51 per cent of local authorities surveyed believed that there had been sufficient time to train staff ahead of the implementation of the HRA.

Furthermore, many of those interviewed described developing new training opportunities for staff within their department. One interviewee described how they had identified the areas where they were weakest, for example welfare benefits, and ensured staff were trained in that area. Some also spoke about the importance of interview training to ensure all housing officers were asking the right questions in the right way during homelessness assessments. As well as staff training, housing authority professionals have organised briefings or training for elected members and partner agencies.

“We have been recruiting and we have done lots of training, culture change and transformation work; stepping away from a seven part assessment into more collaborative conversation, motivational interviewing training, making a more person led service and redesign of front office. We will have eight new officers”

- local authority

Accommodation challenges: can homeless young people access the private rented sector?

97 per cent of local authorities report that there is insufficient suitable, affordable accommodation for young people in the private rented sector in their area.

With limited social housing available in many areas, the private rented sector must be made accessible to all young people in order to both prevent and relieve homelessness in the longer term. Those interviewed explained how supported accommodation is often the initial housing route for young people; however it is not a long term solution. It may be the safety net which prevents homelessness and gives young people the space they need to develop their independent living skills, but they will still face the same challenges in accessing longer term housing. Our research highlighted a range of factors which have locked homeless young people out of this housing sector.

Welfare reform aimed at young people is a barrier to local authorities delivering their existing housing duties, according to 85 per cent of the local authorities surveyed. Urban areas were more than twice as likely to deem welfare reform the biggest barrier as rural areas; 39 per cent compared to 18 per cent.

“I think the single room for under 35s rule is just crazy. In this area you cannot find [a property for] £50 a week [on top of your benefits], it will get you nothing. Obviously it's all about saving money”

- local authority

For tenants in the private sector, the Local Housing Allowance (LHA) is used to calculate how much housing support they are entitled to. It is set at the 30th percentile on a list of rents in the broad market area, though in reality it does not even meet this level as it has been frozen since 2016. Single people under 35 are usually only entitled to the shared accommodation rate, which is based on the cost of renting a single room in a shared house. However, almost all local authorities thought that this lower rate of entitlement makes it difficult for people under 35 to secure private rented accommodation. In reality, it undermines the extra support that local authorities are trying to put in place to support homeless young people.

99 per cent of local authorities agreed that LHA restrictions make it difficult for under 35s to secure affordable private rental sector tenancies.

“We have a PRS access scheme but for young people that’s not very useful. Because of LHA rates the rate is £66.70 a week and finding a house share at that level is difficult. Access (to the scheme) is okay, but finding a property is more difficult”
– local authority

Some young people may be able to claim the one bedroom rate when they turn 25; those who have spent at least three months in a homeless hostel or are a former prisoner managed under the multi-agency public protection arrangements (MAPPA). Furthermore, care leavers can claim the one bedroom rate until they are 22. The vast majority (88 per cent) of local authorities believed that expanding the exemptions to the shared accommodation rate to include all under 35s who were homeless or at risk of homelessness would help them to deliver their housing duties to young people.

On March 29 2018, it was announced that the government would be reinstating the automatic eligibility of 18 to 21 year olds to claim Universal Credit for their housing costs. This is a much welcome move as 96 per cent of local authorities had said the policy made private landlords less likely to rent to this age group, and 82 per cent thought the same of social landlords. However, wider rhetoric about young people’s access to housing support has created a sense of insecurity and uncertainty about their ability to manage a tenancy and pay their rent, despite the removal of the policy.

“The perception of Universal Credit is still there and they (landlords) are already putting up those barriers and not wanting to house those on Universal Credit – we are trying to change perception with landlords”
– local authority

93 per cent of local authorities thought that Universal Credit makes landlords less likely to let to young people on benefits

Almost all local authorities thought that the roll out of Universal Credit makes landlords less likely to let to young people on benefits. The five week wait for the first payment was cited as particularly problematic, alongside a lack of effective communication between the local housing authority and Universal Credit. In particular, explicit consent can make it difficult for professionals supporting a young person to advocate for them and ascertain whether rent has been paid to the landlord. This makes it more difficult to know which young people might need extra help to pay their rent and manage a tenancy.

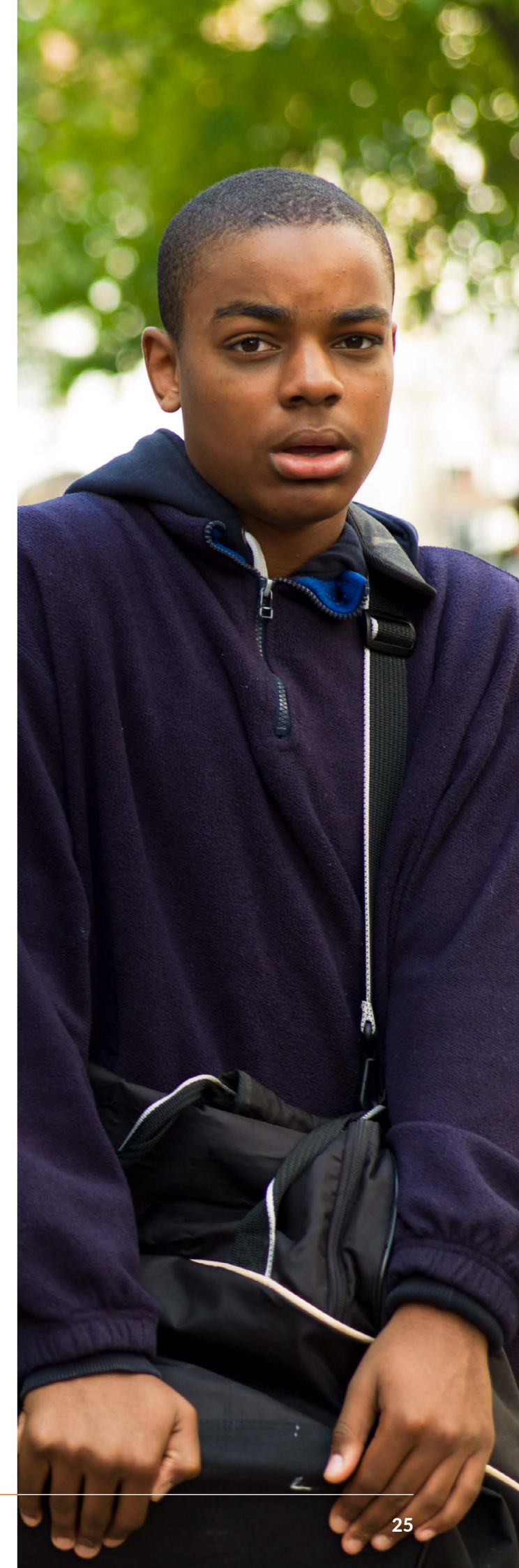
“Universal Credit is a pain in the backside. The myth of this six week payment thing, often you are talking eight to 10 weeks. When you place a single person in that accommodation you are on a wing and a prayer as councils don’t have access to the DWP database; you don’t know if the landlord gets paid”
– local authority

Interviewees reported that private landlords who used to accommodate young people now target their accommodation at professionals to get higher rents. One said that some landlords would rather leave properties empty and wait for higher rents rather than accept a tenant in receipt of benefits. Two interviewees discussed how other local authorities are seeking to place young people in private accommodation in their area when supply is already limited.

It is important to note that interviewees were also concerned about increasing barriers to housing association accommodation too, due to tenancy requirements and affordability. They outlined how important it is to instil confidence with all landlords, both private and social, that young people will make viable tenants. This may mean providing rent deposits, references, tenancy readiness courses, acting as a guarantor, leasing properties directly or providing management and support. For young people with higher support needs, floating support offers the added help needed to ensure they manage any additional issues as well as their tenancy. However, this is often piecemeal and dependent on funding available locally, which leads to an inequality of access to support between local areas.

“We did work with some PRS properties and started utilising the PRS for house shares for under 35s but the main issue came with the level of support needed - with a mix of under 35s in an HMO, it needs to be closely managed. It became clear we should have leased them rather than kept in the PRS so you have control of the management”
– local authority

It is absolutely essential that ongoing support is available to those young people who need it in order to prevent the breakdown of a tenancy and subsequent homelessness. Local authorities explained that the first tenancy is the most crucial moment; it is the first stepping stone from homelessness to independent living. If this fails, the young person may fall back into homelessness.



Conclusion

The Homelessness Reduction Act marks a fundamental shift towards a preventative approach, improving the support available to those who are homeless or at risk of homelessness. It will ensure that local authorities take all reasonable steps to support someone experiencing, or at risk of, homelessness on the condition that they cooperate with their local authority.

Our research has highlighted the aspects of the Act that local authorities are doing well and are positive about, and the aspects that will prove a challenge. It also highlights factors which are beyond the scope of the legislation, but that may hinder implementation. The key message of this report is that young people have needs distinct from the wider homelessness population. Local authorities, partner agencies and central government all have a responsibility to ensure that the provision which stems from the Act works for young people.

As the main cause of youth homelessness is family breakdown, all agencies must be alert to the factors which might push a family towards breaking point. Mediation, or conciliation, is not sufficient to tackle the underlying problems that are faced by many of these families and a more comprehensive approach will be needed. It is absolutely essential that agencies work together locally to achieve this and many local authorities are already working well with agencies in their area. However, it is concerning that the agencies that local authorities are less likely to work effectively with are NHS services and Jobcentre Plus. It is crucial that effective working relationships are in place across those agencies, as well as in agencies not currently subject to the duty to refer including the police, GPs and further education institutions.

Where youth homelessness cannot be successfully prevented, the relief duty should ensure that a local authority helps a young person to secure accommodation. However, there are concerns about the level of support a local authority might offer in order to fulfil their duty to 'help to secure' accommodation. Ultimately the onus is still on the young person, unless they are owed the main housing duty. It is also crucial that the right, age-appropriate, accommodation options are available. Many young people with support needs will enter supported accommodation; however there are concerns about how this accommodation will be funded in the future. Many young people will have no choice but to seek accommodation in the private rented sector, which is incredibly difficult to access due to availability and affordability. Almost all councils stated that Local Housing Allowance restrictions make it difficult for young people to secure tenancies. With so many barriers in place, landlords are reticent to let to young people, particularly those on benefits. Finally, there is concern among local authorities about the level of demand now that there is a duty to provide all eligible applicants with an assessment, and the amount of funding currently in place to do so.

Overall, there is much to be positive about now that the Homelessness Reduction Act has come into force. Many local authorities are rising to the new challenge and innovating in order to provide the best possible service to young people in their area. However, it remains to be seen whether external factors including the housing market and the welfare system will prove to be an insurmountable challenge.

Notes

1. Centrepoin (2018) More than just a number: the scale of youth homelessness
2. Centrepoin (2018) More than just a number: the scale of youth homelessness. [Note that the 86,000 is based on data from 2016/17, however our analysis suggests that numbers remain relatively consistent year on year].
3. MHCLG (2018) Rough sleeping in England: autumn 2017 <https://www.gov.uk/government/statistics/rough-sleeping-in-england-autumn-2017>
4. House of Commons library (2018) Briefing paper: youth unemployment statistics <http://researchbriefings.files.parliament.uk/documents/SN05871/SN05871.pdf>
5. Centrepoin (2015) Families under pressure: preventing family breakdown and youth homelessness
6. Crisis (2014) Turned away: the treatment of single homeless people by local authority homelessness services in England
7. Crisis (2015) The homelessness legislation: an independent review of the legal duties owed to homeless people
8. Centrepoin (2018) More than a number: the scale of youth homelessness in the UK
9. Centrepoin (2015) Families under pressure: preventing family breakdown and youth homelessness
10. Ministry of Housing, Communities and Local Government (2018) Homelessness Code of Guidance for Local Authorities Guidance
11. *ibid*
12. *ibid*
13. *ibid*
14. Centrepoin (2018) More than just a number: the scale of youth homelessness in the UK
15. Centrepoin (2015) Families under pressure: preventing family breakdown and youth homelessness
16. Ministry of Housing, Communities and Local Government (2017) New burden assessment pro forma https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/652196/HRA_new_burdens_assessment_pro_forma.pdf
17. Ministry of Housing, Communities and Local Government (2017) Homelessness Reduction Act – new burdens allocations by local authority https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/652195/New_burdens_allocation.pdf
18. UK Statistics Authority (2015) Assessment of compliance with the Code of Practice for Official Statistics: Statistics on Homelessness and Rough Sleeping in England
19. Centrepoin (2018) More than a number: the scale of youth homelessness in the UK

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