

Borough Council of
**King's Lynn &
West Norfolk**



Homelessness and Rough Sleeping Strategy 2019 - 2024

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Homelessness and Rough Sleeping Strategy

1. Government policy

The Government made a commitment to develop a national strategy to halve rough sleeping by 2022 and eliminate it altogether by 2027.

A Homelessness and Rough Sleeping Implementation Taskforce has been established. We will engage with this group for the duration of our Housing, Homelessness and Rough Sleeping strategy 2019-2024, using the Ministry for Housing, Communities and Local Government's Rough Sleeping Strategy (August 2018) as a point of reference.

2. Legal requirement to produce a strategy

The Homelessness Act 2002 requires local housing authorities to publish a homelessness Strategy every 5 years. To produce the 2019-2024 strategy we have undertaken a comprehensive review of the situation in west Norfolk and compared this to national data.

This strategy sets out what actions the council will focus on in the next 5 years to 2024.

This includes responding to the increasing demand for housing and homelessness services, which has occurred over the last 3-4 years. It also includes assessing changes

to the way services are accessed, welfare reform, and access to and affordability of rented homes (private and social).

This strategy serves to highlight some of these issues and proposes actions to mitigate their impact. It will also cover wider challenges relating to housing for people with support needs and actions to address the supply of new housing.

It is not a description of the council's day-to-day operational activities in relation to homelessness and housing advice – much of this information can be found on the website.

In addition to this strategy, an associated action plan has been produced which will be reviewed annually and update for the following year.

3. Legal requirement to review Housing Needs

Housing authorities are required under section 8 of the Housing Act 1985 (as amended by section 124 of the Housing and Planning Act 2016) to review periodically the housing needs of their area. This review has just been undertaken and we will be publishing the findings online. We will take the findings of the Housing Needs Review into account in the development of this strategy's associated action plan.

4. Duties under the Homelessness Reduction Act 2017

The Housing Act 1996 (Part 7) is the primary legislation setting out a local authority's duties towards homeless households.

The Act outlines a main duty to secure accommodation for applicants who meet 5 'tests':-

1. Are eligible,
2. Are homeless or threatened with homelessness (within 28 days)
3. Are in 'priority need' for housing (categories of more vulnerable households) and were
4. Homeless unintentionally (individuals hadn't worsened their circumstances through their own actions).
5. Have a local connection

The Homelessness Reduction Act 2017 has amended the 1996 Act to introduce additional new statutory duties to 'prevent'* and 'relieve'** homelessness for all eligible applicants homeless or threatened with homelessness within 56 days.

(*'Homelessness prevention' means providing people with the ways and means to address their housing and other needs to avoid homelessness.)

(**‘Homelessness relief’ is where an authority has been unable to prevent homelessness but helps someone to secure accommodation, even though the authority is under no statutory obligation to do so.)

One of the objectives of the amendment to the Act is to ensure that all categories of homeless households receive an appropriate service. On a national basis, this is intended to address concerns of inconsistency and poor customer practice in the context of rising numbers of single homeless people.

This puts the onus on local authority staff, including our own, to work for a longer period of time in both the ‘prevention’ duty period (56 days) and the ‘relief’ duty period (also 56 days) before a decision on whether a main duty is owed.

The Act puts homelessness prevention activities on a statutory footing.

It requires us to assess everyone’s housing needs and support needs and to complete a Personalised Housing Plan (PHP).

The Act also introduced a new ‘duty to refer’ on other public bodies. This means a requirement for a range of organisations to

help identify and refer people threatened with homelessness. The Government in early 2019 has consulted on the introduction of Homelessness Reduction Boards. Such boards seek to strengthen a ‘whole system’ approach to homelessness reduction involving multi-agency partnership working, as well as structures that are accountable.

5. What is homelessness?

Homelessness is not just people sleeping on the streets. Homelessness exists in many different forms, and often the scale and complexity of the issue is hidden.

The law defines someone as being homeless if they do not have a legal right to occupy accommodation, or if their accommodation is unsuitable to live in. This can cover a wide range of circumstances, including, but not restricted to, the following:

- having no accommodation at all
- having accommodation that is not reasonable to live in, even in the short-term (e.g. because of violence or health reasons)
- having a legal right to accommodation that you cannot access (e.g. if you have been evicted illegally)
- Living in accommodation you have no legal right to occupy (e.g. living in a squat or staying with friends temporarily).

Housing authorities have a legal duty to provide advice and assistance to people who are legally defined as homeless or threatened with homelessness.

The vast majority of homeless people are families or single people who are not sleeping rough, but who are facing difficulty circumstances where their accommodation is temporary, or inappropriate. Some may be staying with relatives and friends on a temporary basis. Others live in temporary accommodation, such as bed and breakfast hotels, hostels, night shelters and refuges.

This may mean people are living in poor quality accommodation that could be detrimental to their health and well-being, prosperity and education. In many cases, the uncertainty of not having a permanent home causes stress and anxiety as well as practical difficulties.

6. What is rough sleeping?

The most extreme form of homelessness is when people are sleeping rough. Sleeping rough is defined as: people bedded down in the open air (such as on the streets, or in doorways, parks or bus shelters); or people in buildings or other places not designated for habitation (such as barns, sheds, car parks, cars, derelict boats, stations or cardboard boxes).

The number of people sleeping rough has increased in the area in recent years. Prior to 2016/17 each year, on a designated day, the council was required to undertake a ‘count’ of rough sleepers. It was usual to report only a handful; some years none at all. Since then the annual count numbers have been considerably higher.

The ambition of any local strategy must ultimately be to eradicate this problem. Anything less does not reflect the immediate danger to life of exposure to the cold in winter and the health problems associated with living this way. Such a local ambition mirrors the Government’s policy to eradicate rough sleeping.

7. Review of Homelessness and Rough Sleeping in the area

To understand the issues in the area fully, we must look at more than just the data we have to submit to central government.

In future local data will be collected in a different way. As well as needing to meet the requirements of H-Clic it is important to go beyond capturing the date from people who approach the council.

Information will be collected from a range of partners relating to those who are rough sleeping or in danger of rough sleeping, but who are not necessarily working directly with us.

What is H-Clic?

H-Clic is the Government’s new data collection system. It provides a central record of homelessness and its causes and is intended to help guide councils’ homelessness reduction activities.

This includes:-

- Views of local stakeholders - including views captured at strategy meetings,
- Information from commissioned housing related support services
- Engagement with rough sleeper outreach and Winter Night shelter operation – on-going monitoring of rough sleeper population.
- Colleague discussions and review of national publications including the NAO report on homelessness in 2017.

The information presented graphically in this section runs for the period 2010 to 2016/17 and shows a trend over this period. A separate section is included to reflect on the period 2017/2018 and 2018/2019. This includes information from the new H-Clic data collection system.

In the Government’s Rough Sleeping Strategy, research published in a report titled ‘Hard Edges’ (Bramley and Fitzpatrick, 2015) identifies poverty, and particularly childhood poverty as the most powerful predictor of all forms of homelessness. Information produced by the campaign to end child poverty using census data from 2011 showed high levels of children living in poverty in King’s Lynn. Many areas south-east have rates of 20% or less.

The table above shows child poverty rates before and after housing costs are taken into consideration in the wards with the highest levels. These wards are on par with the constituency in Britain with the highest levels of child poverty. Bethnal Green and Bow constituency is second in the rankings of highest areas at 55.3% of children living in poverty after housing costs. North Lynn Ward is 55.6% after housing costs.

Ward	% of children before housing costs	% of children after housing costs
North Lynn	41.9%	55.6%
South & West Lynn	32%	46.8%
St Margarets with St Nicho	32%	46.8%
Springwood	28.6%	42.5%
Fairstead	28.6%	42.5%
Old Gaywood	27.2%	41.4%

The graphic opposite demonstrates how, through two measures of homelessness (homelessness acceptances and households in temporary accommodation) the position nationally has worsened from 2010 to 2016/17. This plateaued in 2016/2017. A comparable graph produced now would show a fall in ‘acceptances’.

The term ‘homelessness acceptances’ describes the number of households where a main duty is owed (as described above), and the five tests are met.

Looking locally from 2010/2011 onwards (see table) – similarly a rise in main duty cases took place until 2016/17 and then a decrease. This trend reflects significant changes to the legislative framework, namely the Homelessness Reduction Act 2017.

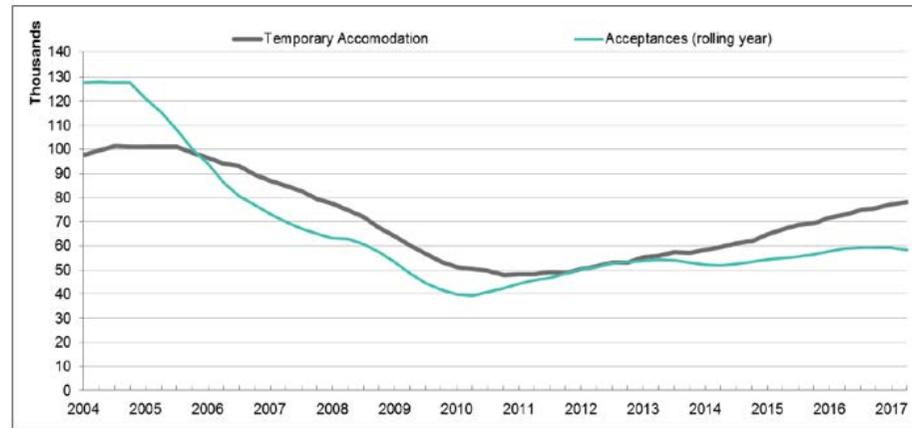
There are fewer main duty decisions because the decision is delayed while the council works with the households firstly under the Prevention Duty (56 days) and then the Relief Duty (56 days). This means that homelessness can be resolved before the full duty is owed.

As detailed above, it has been necessary to review and change the homelessness



Ministry of Housing, Communities & Local Government

Homelessness –national trends Acceptances and households in temporary accommodation



Measure	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Main Duty	79	87	81	106	99	116	117	84	31

measures in order that an accurate evidence base is created for informed decision making. We will present the information collected on a quarterly basis on a dedicated page on our website.

The measures need to change in order to align with the government’s new data

requirement and the new legislative framework. It is important that no single measure should be looked at in isolation, and that some measures including the rough sleeper count are snapshots at one moment in time and may not reflect an accurate picture.

Analysing the table below together with other relevant sources of information, we can draw the following conclusions:

- Bed and Breakfast spend has increased as numbers of homelessness acceptances have increased and the numbers of households where we have an obligation to provide temporary accommodation has increased.
- The number of households where we have financially assisted with loans for deposits or rent in advance has decreased as access to the private rented sector has become more difficult due to competition and affordability.

The table top middle shows that the council's use of bed and breakfast has increased in recent years, which is in line with national trends. Whilst this trend is concerning, the above table shows that the council's bed and breakfast expenditure 2015/16 was considerably lower than some other local authorities in Norfolk.

It should be noted that the use of bed and

Local Authority	B&B spend 2015/16
Breckland	£104,000
Broadland	£65,000
Great Yarmouth	£58,000
North Norfolk	£78,000
Norwich	£100,000
South Norfolk	£256,000

Measure	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19
Bed & Breakfast spend	£16,946	£13,153	£4,223	£5,934	£18,226	£12,794	£40,789	£16,641	£45,649
Deposits / rent in advance				65	55	38	28	14	29
Rough Sleeper Count	8	5	6	3	3	5	42	9	5

Ref	Link to Corporate Priority	Name	Good Performance	2018/19 cumulative performance	Q1 2019/20 target	Q1 2019/20 cumulative performance	Q1 2019/20 status	Versus this time last year	Note
HD1	2	% of HMO's inspected in accordance with the programmed inspection regime	Aim to maximise	-	100%	100%	🟢	🟢	
HD2	2	Spend on bed and breakfast accommodation (gross)	Aim to minimise	£45,648	-	£6,976	-	🟡	
HD3	2	No of households with a homelessness declaration	Aim to minimise	-	-	122	-	🟡	
HD4	2	No of households prevented from becoming homeless for a minimum of 6 months	Aim to maximise	485	-	13	-	🟡	
HD5	2	No of households accepted as homeless with a need to be rehoused (Full housing duty)	Aim to minimise	-	-	6	-	🟡	
HD6	2	% of cases who were offered a prevention and relief duty who remain homeless and are owed no further duty	Aim to minimise	-	-	41.8%	-	🟡	
HD7	2	No of rough sleepers	Aim to minimise	5	-	27	-	🟡	

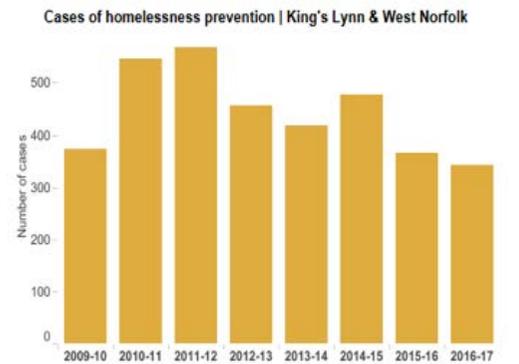
Ref	Link to Corporate Priority	Name	Good Performance	2018/19 cumulative performance	Q1 2019/20 target	Q1 2019/20 cumulative performance
HS8	2	No in temporary accommodation - bed and breakfast	Aim to minimise	55	-	14

breakfast is a matter of last resort. It is particularly inappropriate for families. It is unlawful to use such accommodation for families beyond a period of six weeks. The council's objective is to minimise the use of such an option.

The performance table above shows some of the new measures reported for the 1st quarter of 2019/2020.

Looking at the local picture in terms of the use of temporary accommodation (see 1st graph on the right) shows an upward trend in line with regional and national trends.

The 2nd graphic on the right shows the decline in the cases of homelessness prevention – it shows the number of households where homelessness has been prevented including access into private rented tenancies and



assistance to remain in their existing home. In King’s Lynn and West Norfolk this has shown a trend of decline from 2011/12. One of the key points relevant to this measure is it represents the council’s ability to make effective use of the private rented sector (PRS) to prevent homelessness.

The extant conditions for the period of this graph were:

- strong demand
- poor accessibility into PRS
- a big gap between low income and the cost of private rent sector properties

8. Review of rough sleeping and rough sleeper encampments in the borough

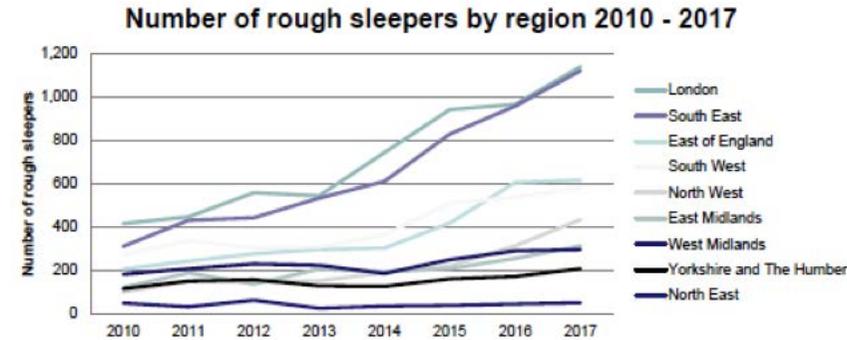
The Government requires councils to undertake an annual count of the number of people in its area that are rough sleeping. This is a snapshot taken on a specified night in the winter. Officers go out and physically count the number of people bedded down on the streets.

It is recognised that there are clear limitations to this count as a measure.

Historically this area has very low rates of rough sleeping, with high rates being confined to large cities.



Homelessness - the current position: Rough sleeping has more than doubled since 2010



- 4,751 people slept rough on a single night in Autumn 2017, up 15% from 2016.
- 615 people slept rough in the East of England region, a 2% increase on the previous year, but 3 x more than in 2010

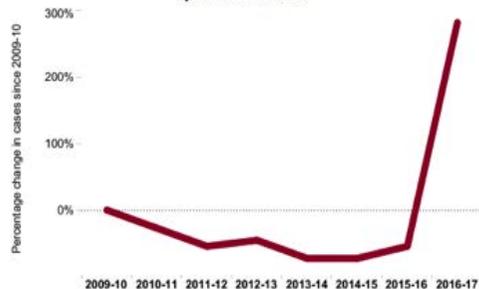
The picture has changed in the last 2-3 years, as it has in other cities and towns in the country. The graph above shows the trends in rough sleeping estimates since 2010 across different regions of the country. The rates of rough sleeping by 2017 in the East of England were 3 times more than they had been in 2010.

The annual rough sleeping count for Borough Council of King’s Lynn and West Norfolk in 2016/17 revealed 42 people rough sleeping. The same count in 2017/2018 recorded nine, and the 2018/19 recorded five. Again it must be noted that this figure

doesn’t represent the true picture of rough sleeping – which according to other sources of intelligence has increased.

Any number of rough sleepers represents an emergency, as evidence shows that it is a highly dangerous thing to do. It is evident that, whether through the rough sleeping count, or evidence of encampments of rough sleepers that the council has identified, that the prevalence of rough sleeping is higher than it has been in the past, and is consistent with aggregate information across the East of England.

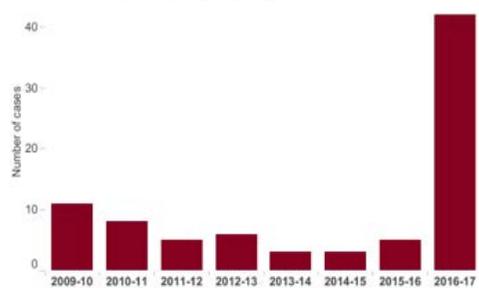
Percentage change in measures of homelessness since 2010-11 | King's Lynn & West Norfolk



- in prison (close to discharge),
- sofa surfing or at friends with no prospect of remaining in the future.

The image below represents the categories of information captured.

Rough sleepers | King's Lynn & West Norfolk



On-going record of those rough sleeping, or in danger of rough sleeping

- rough sleeping on the night of 14th November
- 23 sofa Surfing
- 16 in accommodation
 - 1 x QEH in patient
 - 2 x in prison
 - 2 x housed
 - 4 x accommodated at Merchants Terrace
 - 1 x staying with family
 - 1 x accommodated a Right Tracks
 - 1 x cohabiting with new partner

The way in which the Government sets out the methodology means that the true picture of homelessness can be understated or misunderstood.

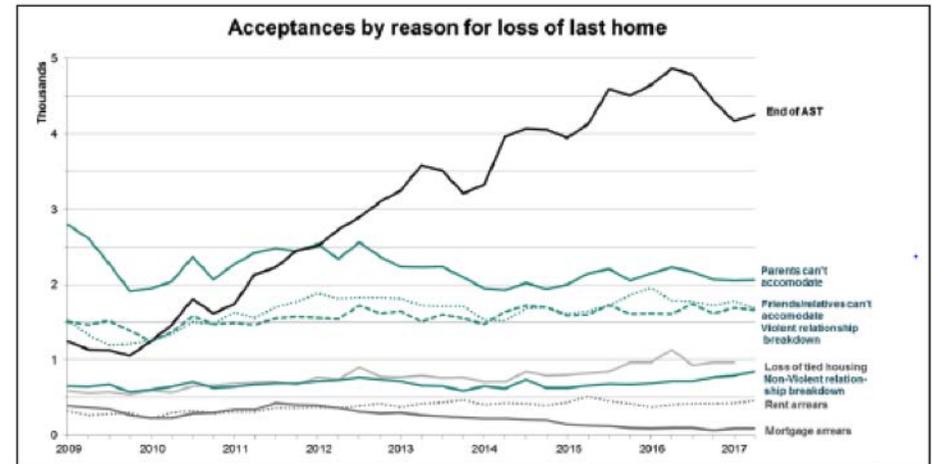
The council and its partners have now adopted an ongoing monitoring arrangement of those who are rough sleeping or threatened with rough sleeping. This monitoring captures circumstances where people may be in danger of rough sleeping including those:

- in emergency hostel beds,
- in hospital (without accommodation),

In the last winter period 2018/19 a count of rough sleepers in the town would not have included those staying overnight in the town's night shelter. At times, the shelter accommodated up to 20 people over night.



Homelessness - the national position: Acceptances by reason for loss of last settled home



Ending of an assured shorthold tenancy continues to be the most common reason for loss of a settled home: 27% of acceptances (31% in London).

9. The Reasons for homelessness or being threatened with homelessness

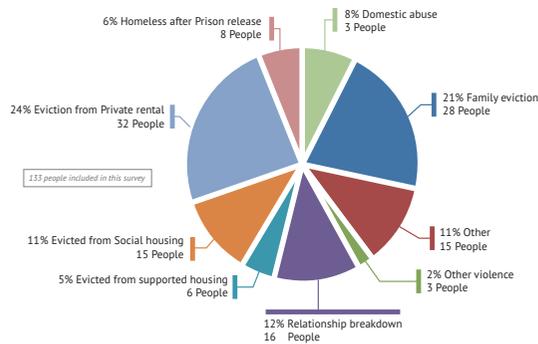
Central Government record the reasons that people become homeless. The reasons that people lose accommodation are varied, but the most commonly reported reason locally, in the East of England, and nationwide is through ending of a private assured shorthold tenancy.

Relationship breakdown is another common reason for homelessness (locally

and nationally). Locally there has been a recent rapid increase in the reason for homelessness being parental exclusion.

Other reasons identified for losing accommodation include:-

- Rent / mortgage arrears
- Friends/ relatives can't accommodate
- Violent relationship breakdown
- Non-violent relationship breakdown



Reason for approach as homeless or threatened with homelessness Q3 2018-19

The table and chart above shows the reasons that people have approached the council as homeless or threatened with homelessness.

Notably evictions from social housing and supported housing (both categories will involve social housing landlords) total 16% of all cases. This matter is something identified in work with partner landlords under the ‘Homes for Cathy’ working group as detailed in the action plan.

10. Identifying issues, causes and gaps in service provision

Once someone is homeless or at risk of homelessness, they can be faced with other issues that make it difficult to gain accommodation and keep it.

Many of these factors are consistent with factors identified nationally through research undertaken by The National Audit Office and presented in their report on Homelessness in 2017.

- Changes to Local Housing Allowance and the impact this has on the affordability of private rented sector accommodation.
- Difficulties in accessing PRS accommodation at a certain price point because of high demand
- Difficulties in accessing social housing because of limited new supply and lower rates of turnover of existing stock.
- Challenges of securing appropriate accommodation with support for people with ‘complex needs’, particularly those who are seeking help late in the day after they have lost their last home.

There are many other relevant factors including reductions in funding and service provision to housing related support (Supporting People administered by Adult Social services), in mental health services, in probation services. As a result of these changes there are some gaps in provision that are identified in this document.

10.1. Welfare Reforms

Available evidence points to Local Housing Allowance (LHA) reforms as a major driver to link loss of private tenancies and increasing cases of homelessness. LHA rates were frozen on 1 April 2016. This has created affordability issues and a widening gap between Housing Benefit (Local Housing Allowance rates) and rents. The gap locally is approximately £40pw on a single shared room, in the context of single claimants (particularly under 35s and under 25s) on Employment Support Allowance. The LHA cap ends in 2020 – policy options thereafter. The scenario below (based on data from 2018) for an under 25 year old adult in the borough claiming employment support allowance serves as an example of the impact on the LHA cap and rising rents:-

Cost of shared room pw	£95
Housing Benefit pw	£55
Shortfall pw	£40
Employment Support Allowance pw	£57.90
Left to live on pw	£17.90

As all working aged benefits have been frozen during the same period of time households have less disposable income to cover the shortfall between housing benefit and rents.

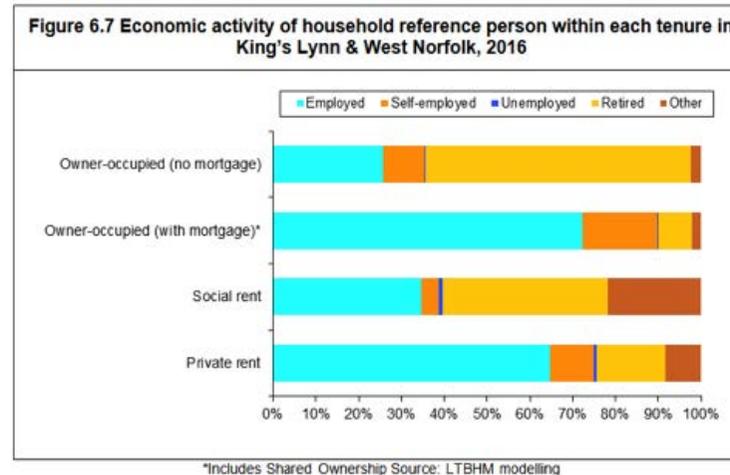
At the time the strategy has been prepared the numbers moving on to Universal Credit (UC) from Housing Benefit is accelerating. There have been changes as a result of lessons learned from pilots. Some of the changes relate to provisions for certain categories of tenants to have Alternative Payment Arrangements (APAs – allowing tenants to have the housing element of their UC paid directly to their landlord). Over the life of the strategy working with internal colleagues and partners we will monitor the impacts of UC on housing debt and homelessness.

10.2. Accessing the Private Rented Sector (PRS)

national level). Between 2011 and 2016 the PRS in the borough increased by 34.2%. This is a greater rate than is recorded both regionally and nationally. The below table taken from the council’s draft Housing Needs Assessment shows that not only has the PRS expanded, but the households within it have diversified. The most notable change has been the growth in families now residing in the PRS.

Additionally the table below shows that the majority of household heads in the private rented sector are in work. In this context those on low incomes with limited choices have had to compete with increasing numbers of other renters. Rents levels, the

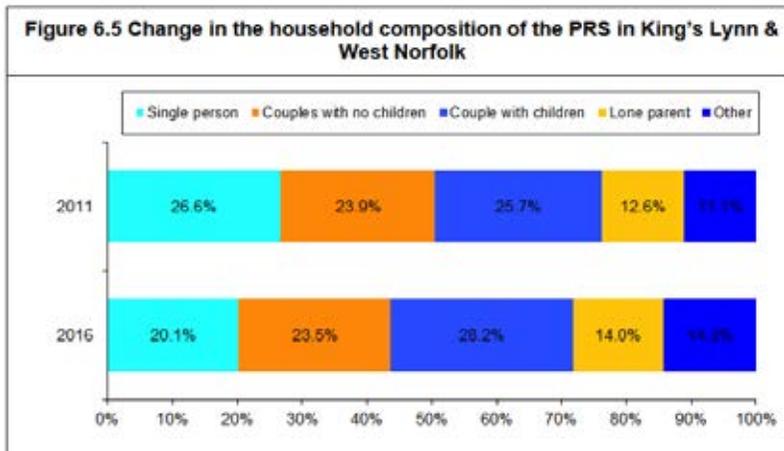
10.3. Declining delivery of new social housing and the declining opportunity to access existing social housing



The turnover of existing social housing has declined in recent years. With fewer properties becoming available via re-lets there has been less affordable housing to meet need. The table below shows that there has been almost a 50% reduction in the number of affordable properties becoming available in recent years. Note this includes new build affordable housing.

Year	Number of lets
07/08	859
08/09	711
09/10	948
10/11	828
11/12	919
12/13	658
13/14	816
14/15	823
15/16	641
16/17	571
17/18	548
18/19	479

Additionally the supply of new social housing (that is in part linked to market sale housing delivery) has also been declining over recent years. The table below provides figures on the supply of new build affordable housing in the borough since 2010. The net figures are once we have taken into account



The LHA reforms detailed above have come about at a time when demand has continued to increase, in a period of extended growth of the PRS sector (at both a local and

requirement for rent in advance, and high deposits continue to be barriers to accessing the PRS.

conversions of existing dwellings and right to buy sales.

Year	New Build Affordable Housing completions
20/21	157
19/20	148
18/19	109
17/18	77
16/17	60
15/16	73
14/15	28 (net gain of 24)
13/14	29 (net gain 25) 36 RTB= 5M units
12/13	61

10.4. Challenges of securing accommodation for people with complex needs

We have seen an increase in the proportion of people seeking help who have complex needs. For example, people who experience a combination of high support needs including those with mental health problems, substance misuse issues or learning difficulties. The challenges worsened when people present to us as being ‘homeless tonight’ when they have not sought help until they have reached crisis point.

The accommodation and support options for this group are limited which makes securing the right type of accommodation challenging.

A number of such cases are characterised by a person having a crisis that might necessitate a stay in an institutional setting. Then the individual is discharged to a

situation of no accommodation. Often, this cycle is then repeated many times.

11. Identified gaps in provision

a) Move on accommodation – There is a real issue that we have identified with stakeholders in the availability of accommodation to move people from a temporary arrangement to permanent housing. As a result temporary accommodation is used for longer than intended and limits opportunities to relieve homelessness for some households. This can mean a greater use of less appropriate accommodation such as the use of bed and breakfast.

Move on accommodation can help move people through temporary accommodation, and provide them, with a more medium-term housing solution (often with a degree of support) in a central location. Efforts to secure a permanent housing solution can continue without the same pressure on temporary accommodation.

b) Step down accommodation for people with mental health problems. Step down accommodation is for people who no longer need to be in hospital but need a degree of support whilst they adjust to independent living. The local hospital has indicated that

such accommodation could prove invaluable in addressing the needs of patients who don’t need to stay in hospital but need a degree of support and access to services immediately if someone’s mental health condition worsens. There has also been a gap identified in the provision of short-term accommodation for people in mental health crisis – where existing accommodation including hostel accommodation or other forms of temporary accommodation is unsuitable or individuals face the danger of rough sleeping.

c) Specialist accommodation
Finding accommodation for those leaving prison is as much of an issue locally as it is in other parts of the country. Funding reductions to the probation service and funding reductions made by Norfolk County Council (Supporting People funding) mean there is currently no specialist accommodation or housing support services for people leaving prison. Information from the Ministry of Justice reveals that 16% of all prisoners are homeless, well above the average of 0.5% of the whole population. There is evidence that providing accommodation for people leaving custody can reduce re-offending.

d) Younger persons’ accommodation Young people, including care leavers, face difficulties in accessing private

rented housing. This has become more apparent since changes to the welfare system. Young people can find themselves relocated to an area where they have no local connection which makes the problem even more challenging.

e) Review of Social Housing Providers (RPs)

Policies

The policy approaches of Registered Providers can be part of the solution or part of the problem in terms of the barriers to tackling homelessness. Debt, eviction and allocations policies can be a barrier to some homeless households being able to secure accommodation.

A collective of housing associations with a progressive approach to their contribution to homelessness reduction has been formed – called ‘Homes for Cathy’. Some actions have been identified in order to support this work.

12. Our strategy objectives

The review has enabled us to identify the following objectives, which cover the term of this strategy.

Each year we will produce an associated action plan to ensure progress is being made against our strategy objectives.

12.1. Prevention of homelessness

- a. Work very closely with the council’s recently-commissioned homelessness prevention services to ensure that those at greatest risk of being homeless are assisted.

These services include:

- i. Homegroup Community Support service – to support those identified by the council as being at crisis point and at greatest risk in terms of losing a tenancy in the future.
- ii. Benjamin Foundation –floating support for young people/care leavers that have moved on from Right Tracks (young persons supported housing)
- iii. Purfleet Trust – who deliver intensive housing services, working with the those people with the most complex needs. The council has successfully bid for funding the Government has made available to tackle rough sleeping (Rapid Rehousing Pathway). The £106K allocated for 2019/20 will fund 3 posts hosted by The Purfleet Trust. Two rough sleeping ‘navigators’ will help rough sleepers into settled accommodation, and support them in an intensive way to access health and other services they

need. A further role will involve on-going support in a less intensive way to those re-settled in private rented accommodation to ensure their tenancy is sustained. The Purfleet Trust with the council is working with some private landlords to identify some properties for this purpose. Funding bid extension to central government The coordination of work with these services will be achieved through regular meeting with locally based staff, and through the preparation of personalised housing plans by the council’s Housing Options team.

- b. Ensure that the council’s Discretionary Housing Payment (DHP) resources are used most effectively in order to prevent homelessness. Officers across housing options and housing benefit teams to work to recent government guidance that highlights that DHP should be an important part of homelessness prevention strategy. The use of this fund will include cases where there is a gap between rent and housing costs on an on-going basis identified at the commencement of a tenancy.
- c. Improve opportunities for access to the PRS for households into the private rented sector. Utilising loans offered to households for tenancy deposits / rent

in advance. In the context of increasing difficulty accessing PRS, pilot and then evaluate the use of rent guarantees in circumstances where a tenancy support package is in place to give the best chances of success.

- d. Seek to review and challenge the approach that Registered Provider (RP) partners take to dealing with tenants and future tenants in the context of preventing homelessness. This is in the context of some of the RPs acknowledging that their own practices can be part of the problem not the solution. Using the ‘Homes for Cathy’ housing association initiative, launched last year, the review will address the 9 commitments made by the associations signed up to this initiative. Broadland Housing association and Freebridge Community Housing are members of the initiative. Examples of practices that have already been initiated by some of the RPs involved include:-

- i. Transferring housing debt to a credit union (or similar) avoiding eviction and homelessness, but not avoiding the need to repay the debt

- ii. Rent arrears freezing in circumstances where payment and re-payment may not be sustainable and lead to further problems and threatened homelessness

- iii. Subsidised accommodation delivered at a loss for homeless households with no recourse to public funds

- e. Undertake awareness raising activities in relation to both tenant and landlords respective rights and responsibilities. The rationale for this is that increased awareness can reduce the likelihood of conflict and a break down in the relationships between landlord and tenant that can lead to ending of a tenancy.

- i. Awareness activities will include tenancy forums and tenancy training for first time renters and landlord forums that will cover regulatory matters. In addition continue to raise awareness regarding the new duties on specified public bodies to refer cases of homelessness to the council.

12.2. Temporary Accommodation Options - Develop a hierarchy of different types of temporary accommodation_

- a. Develop additional new temporary accommodation for families (to meet identified gaps in provision). Examine solutions that bring provision on line in a very timely way making use particularly of modern modular constructed (off-site constructed) products that can be deployed and re-used flexibly.
- b. Ensure continuation of existing temporary accommodation provision in the context of re-modelling some schemes that have lost former revenue streams (reductions in Supporting People funding regime) and utilising the new Flexible Homelessness Prevention Fund (which replaced the management fee of the temporary Accommodation subsidy).
- c. Ensure that a minimum level of support is offered to those in temporary accommodation by putting in suitable commissioned support service arrangements that seek to help equip people with what they need to sustainably move on to more permanent

housing. In doing this ensure that housing benefit system is used in the most effective way – maximising the use of additional ‘Intensive Housing Management’ housing benefit, and reducing levels of Housing Benefit Subsidy (-an element of housing benefit not recoverable from central government).

- d. Continue working with Freebridge Community Housing and other RPs on the provision of general needs temporary accommodation. This enables properties to be identified near to where families are living and are beneficial in reducing any associated impacts like changing schools or losing support networks.

12.3. Access to social housing – for those in most need

- a. Address issues of the under supply of new social housing. A review of planning policy mechanisms to deliver new affordable housing will take place late in 2019 in the context of the Local Plan review/review of the council’s Affordable Housing Development policy. This could include for example allocating sites for new exceptions site housing, creating more certainty over delivery.
- b. Undertake a review of the Social

Housing Allocation policy giving consideration to prevailing circumstances, equality of access, the views of Registered Providers of social housing.

- c. Seek to address issue of mismatch between stock profile and accommodation needs including the needs of working age families and young people.
- d. Opportunities for new council owned registered provider of social housing to invest in new affordable housing.

12.4. Access to good quality private rented sector (PRS) housing

The council has an opportunity to both strategically enable the supply of private rented homes through the planning system, as well as directly deliver PRS through it major housing project.

- a. The council has sought to earmark 20% of new housing developed by the council to be transferred to a new council owned company to hold and manage as privately rented homes. The council’s ambition is to deliver good quality homes and set the bar for high quality management services. The business plan of the new company sets out the objective of using long-term tenancies to provide stability for families wishing to rent.

- b. Continue to explore opportunities to deliver a private sector leasing (PSL) scheme – such a scheme can benefit landlords particularly those with a relatively small portfolio) who can benefit from economies of scale under a pooled management/maintenance arrangement and tenants can benefit from the accreditation standards that would be a requirement of the scheme.
- c. It is a planning requirement to assess the needs of people who wish to privately rent their homes. The new National Planning Policy Framework and associated guidance supports central government ambitions to accelerate investment in purpose build to rent. The council (as part of the Local Plan review) will develop a policy to create the environment for investment in high quality, family friendly professionally managed PRS as described in the governments ‘Build-to-rent Guidance’ published in 2018.

12.5. Support Needs – Ensure appropriate support needs both:- accommodation based and non-accommodation based housing related support

- a. District Direct West Project – The service was initiated in response to amongst other things increasing

cases of people being discharged from hospital and being homeless that night. The pilot started in 2018 and has involved staff from Care and Repair and the Housing Options team working directly with members of the hospital discharge team at the Queen Elizabeth Hospital has proved a success 12 months on. One of the drivers for this service was the situation of people being discharged with no home to go to. The early identification of housing issues (including the need for adaptations; disrepair; homelessness) at a point someone is admitted, rather than when they are leaving creates time for some planning and co-ordination of services. This valuable time is resulting in fewer inappropriate hospital discharge cases.

12.6. Accommodation based supported housing models to meet gaps in provision

- a. Consider and evaluate the provision of ‘Housing First’ models. These are models of housing that avoid transitions through different types of housing from temporary to permanent and seek to provide ‘housing first’ in the first instance. Support appropriate to individual needs is then provided. This approach takes away one of the fundamental barriers in helping

people with complex needs who have had a history of rough sleeping, as it takes away the uncertainty of securing accommodation straight away. This is an intensive and expensive model but evidence from other parts of the world and pilots in the UK has shown that it can work, particularly in relation to repeat homelessness amongst people with multiple disadvantage.

- b. Crisis House provision for homeless people with mental health issues needing immediate and very short term accommodation. This type of service can provide accommodation and support to people in order to prevent them deteriorating, and thereby avoiding hospital admission. Such approaches have been proven to be effective in other areas, and is something that mental health crisis team colleagues have raised with the council. This type of project is often delivered by registered providers or other voluntary sector organisations.
- c. Work with the existing providers including the Benjamin Foundation and YMCA on the development of recognition of the issues facing younger persons including those leaving institutional care/ prison.

Developing shared living models including YMCA’s ‘transition model’ that facilitate a mix of people who may be working.

- d. Work with the charity Break on a supported accommodation model for vulnerable care leavers

12.7. A new co-ordination role for the council

It should be clear that the success of the council’s efforts in reducing homelessness is determined by the effectiveness of how it works with partners, and its role in helping co-ordinate activities. With a myriad of services developing the need for effective co-ordination couldn’t be more important, and therefore objectives include:

- a. Dedicated role to include co-ordination of new services to ensure a ‘joined up approach’, and that the most vulnerable access support they need, and that best use is made of temporary accommodation options - operational group to meet regularly including police and social services
- b. Strategy group formed – to include representatives of key housing and housing support providers to inform approaches that the council will take

and provide opportunity to share and develop ideas for new services

- c. Efforts to raise awareness of the ‘duty to refer’ (under the Homelessness Reduction Act), and monitor effectiveness of the new duty.
- d. West Norfolk Early Help Hub – The help hub offers a referral route for professionals who are supporting individuals or families with emerging needs - these could include housing, debt, domestic abuse, or health/ well-being issues. The council together with other public sector organisations including the police, children’s and adults social services and voluntary sector partners have come together to form a new service. The service exists to help professionals involved in supporting individuals or families in need find the most appropriate services that can help. The ‘Help Hub’ co-coordinator facilitates weekly meetings where cases referred in can be presented and decisions made on getting the right help in a timely way.

13. Housing advice and debt advice services

Any strategy to reduce homelessness needs to include the provision of high quality independent advice. The need for effective

advice services, and access to such services needs to be seen in the context of a rapidly expanding private rented sector and demand for certain priced PRS homes out-stripping supply. It also needs to be viewed in the context of difficulties in accessing legal support through the legal aid system.

The council will procure an independent housing advice service for the area to give opportunity to timely advice where people face defending possession claims or cases relating to illegal eviction/protection from eviction. Alongside a housing advice service will be a debt advice service. Housing advice and debt issues can go hand in hand therefore we expect a degree of interaction between the two services.

The council has re-tendered in 2019 the advice and information services relating to housing and homelessness and debt and income maximisation. Shelter is delivering the housing advice service, and a new organisation ‘Money Advice Hub’ the debt management advice service. Both have a local presence and are focussed on making services highly accessible.

14. Eradicating rough sleeping

Rough sleeping is a dangerous and addressing it is a priority for central Government. The Government has committed to eradicate homelessness

by 2027 and to halve it by 2022. The Government has made funding available in order that we in local government can see that ambition being met.

- a. Develop the newly commissioned Rough Sleeper outreach service. In response to a significant increase in rough sleeping in the town over the last 2-3 years a new outreach service was commissioned in 2018/19. The service currently delivered by Genesis seeks to engage with those known to be sleeping rough on streets or encampments, or at risk of sleeping rough -for example those using the Night Shelter, or people . The aim of the service will be to :-
 - i. make the first contact and build trust
 - ii. address any immediate health issues including mental health issues
 - iii. look at accommodation options, or other actions that can help people off the streets
- b. Record and maintain information on those rough sleeping (or suspected of rough sleeping) or those in danger of rough sleeping in conjunction with partner agencies – for the purpose of a

co-ordinated plan to support individuals off the streets. This could take the form of temporary / or supported accommodation or a return to their area of origin.

- c. Promote the use of Street-Link in order that the wider public are familiar with reporting welfare concerns over those seen to be rough sleeping
- d. Engage with people who are found to be rough sleeping – individuals or encampments of people – primarily through the commissioned ‘rough sleeper outreach’ service. The aim of the service will be to :-
 - i. make the first contact and build trust
 - ii. address any immediate health issues including mental health issues
 - iii. look at accommodation options, or other actions that can help people off the streets
 - iv. Aligned to the rough sleeping outreach team is a mental health nurse appointed in 2019. The aim of this role is to help those sleeping rough

(or threatened with sleeping rough) get treatment for mental health issues. The link between homelessness and mental health issues is well documented. This provision helps meet an identified gap in services. The service facilitates referrals to the Norfolk Integrated Housing and Community Support service. This service exists to provide housing related support to those with a diagnosis of severe mental illness. It also facilitates direct referrals to primary and secondary mental health services, and will also take a clinical role in assessing mental health and administering medication where appropriate

- v. The council will in line with Governments expectations ensure that it provision is made for those who are rough sleeping and need night shelter from a period of extreme cold weather. The council will provide an effective response to help people shelter from the elements during the winter

months, in periods of extreme cold weather. Efforts will be made to engage with those known to be rough sleeping to encourage them to use emergency shelter provision. The council will support the work of the Night Shelter charity whose aims to continue to provide their services at 5 St Ann’s Fort in the town for the winter months (Nov-March). The council will review the provision and seek further capacity in other locations with other providers if necessary. Funding opportunities will be identified from various sources particularly the Ministry for Housing Communities and Local Government.

15. The Council’s strategic role in tackling homelessness and rough sleeping

In a strategic context the following activities will be undertaken;-

- a. Support the work of the council’s Homelessness and Housing Supply task group. This group is examining other areas of council activity to ensure that all resources are being used effectively

to prevent homelessness . The group will have a role in monitoring progress of this strategy.

required by government t in a fully automated way.

16. Cultural Changes

- b. Given the nature of the council’s activities in relation to homelessness prevention is very orientated around partnership working, and commissioning services with other stakeholders it is important that there is a commitment to an on-going engagement at a strategic level. This will ensure that decision making processes are effective
- c. Ensure a coordinated way to effectively monitor the commissioned services established. Assess performance against agreed objective sand targets, and review strategic relevance of services.
- d. Promoting the 9 commitments within the Homes for Cathy initiative looking to change approaches from social landlords
- e. The Government introduced a new system in 2018 for collecting data from local housing authorities in relation to homelessness and housing advice activities. An investment has been made in the council’s Housing Options IT platform that means that the data is collected and produced in the format

Before the Homelessness Reduction Act the majority of homeless applicants – single people were entitled to advice and assistance, however, their needs were often not assessed. Prevention activities locally were prioritised but they weren’t everywhere. Housing authorities were seen as ‘gate keepers’ with assessment and legal process driving activities. Nationally the relationship between council staff and applicants was characterised as being conflictual.

Under the new regime all eligible applicants have an assessment of their housing and support needs. The focus is on council staff and applicants working together (with a personalised plan being obligatory) to prevent or relive homelessness. This is a significant cultural change as well as legal change. There is a continued requirement for training and supervision to ensure this change is embedded.

17. Threats to delivery of the strategy

We have identified actions and opportunities to tackle homelessness and rough sleeping in this document, however there are factors outside of the control of the council that need to be considered in future planning and decision making. Highlighted below are some identified issues that could significantly impact on the council’s activities and therefore the delivery of this strategy:

Risk	Likelihood	Impact	Mitigation
Future reductions to funding from Norfolk County Council that contribute to the costs of some key borough council commissioned support services			
Uncertainty around future central government funding associated with homelessness prevention activities – including Flexible Homelessness Support Grant, Homelessness Prevention Grant, New Burdens funding for the implementation of the Homelessness Reduction Act			
Homes England funding to support the delivery of new build affordable/ social housing			
Local Housing Allowance - current freeze ends in April 2020. Uncertainty about the future policy direction and potential impact on private rented housing affordability			
The impact of any future Government’s policy decision in connection with the use of section 21 notices (1988 Housing Act) given a recent consultation initiative and ministerial statement.			
Changes in housing market activity – including lower demand for market housing, or falling house prices could impact on the council’s plans for direct new delivery of housing			

18. Action Plan for 2019/2020

Action	By Who	By When	Progress
Encourage partner organisations (including private sector partners as well as social sector) to bid for Governments 'Move –on' accommodation fund - in response to the identified need for such accommodation, and the issue of hostel be blocking Move-on funding.	Strategic Housing Team (SHT)	March 2021 latest for funding requirements	Potential site identified, RP engaged, and bid to Homes England being considered.
Evaluate 'District Direct West' and make any recommendations for future operation – seek funding from CCG with a view to mainstreaming service	Housing Options Team/ Care & Repair		CCG Executive Management Team has now approved funding for the District Direct Service. Uncertain for time period.
In conjunction with NSFT recruit and establish a mental health nurse outreach post	Housing Options	End 2019	Post filled summer 2019. In place until Mar 2021
In conjunction with NSFT develop and examine proposals for a Mental Health crisis House provision/ step down accommodation and move-on accommodation. Implementation subject to funding opportunities.	SHT –	Ongoing	Early discussions with Mental Health Crisis Board have commenced.
Take opportunities to bid for money from the MHCLG Rough Sleeping Task Force – under the Rough Sleeper Initiative funding bidding round	Housing Options & partners	Ongoing	Submission made for funding in relation to severe weather provision. Awaiting outcome
Develop temporary accommodation utilising modern modular/ park home style factory built housing units on Council owned land	SHT & Property Services & Broadland Housing	Ongoing	Potential site identified, RP engaged and preparing planning application submission
Work with Broadland Housing association and any other partners on the potential for the provision of a Housing First initiative	SHT	April 2020	No progress
In partnership with Shelter and YMCA organise some training for prospective tenants on rights and responsibilities to avoid early tenancy failure. Explore landlord training at the same time.	Housing Options & Housing Standards	April 2020	No progress
Maximise the effectiveness of local resources by reducing levels of housing benefit subsidy required – Seek to change by agreement model under which FCH operates shared houses with The Purfleet Trust	SHT & Revenue Services, Purfleet Trust & FCH	Dec 2019	Work in progress. Discussions ongoing
Review commitments under flexible homelessness grant – ensuring that available resources are focussed on the most effective services	SHT	Jan 2020	Early stages.
Ensure Local Plan review encompasses identified policy work in relation to affordable housing and build to rent housing – particularly new opportunities arising from changes to the National Planning Policy Framework	SHT & Planning Policy Team, Local Plan task Group	Jan 2020	Work has commenced. Housing needs assessment commissioned and first draft imminent
Undertake a review of the social housing allocation policy and encourage key partners at the same time to review stock profile to make sure social housing is used to benefit those who most need it.	SHT & Housing Provider Partners	April 2020	No progress
As part of the review into the allocations policy, as well as in a wider sense consider the housing needs/ access to housing of young carers and their families	SHT & Housing Provider Partners	April 2020	No progress
Establish a help hub – a service that assists professionals who are supporting households with complex needs by identifying suitable organisations interventions	Housing Options, OPT, Children's & Adults Services	Ongoing	Service established in May 2019
Secure the opportunity for an additional Domestic Violence refuge in the area – follow up opportunity identified with Leeway – Encourage investment by FCH or WNHCC	SHT & RP	April 2020	Ongoing dialogue with RP
Participate in the regional Homes for Cathy regional working group led by Broadland Housing Group	SHT & RP Partners	Ongoing	FCH board have agreed to review a set of policies including those relating to evictions for arrears and lettings in the context of Home for Cathy commitments
In respect of the need to access the private rented sector tenancies trial incentive initiatives – including rent guarantees in circumstances where appropriate tenancy support is put in place.	Housing Options & SHT	April 2020	No progress

Work with Break to secure supported accommodation for vulnerable care leavers	SHT	Ongoing	Early discussions commencing Sep 2019
Work with the YMCA on their proposal for supported accommodation for young people including those leaving prison, and their transition model for young peoples shared housing.	SHT	Ongoing	Early discussions commencing Sep 2019
Work with HAST, MHCLG, and Housing Justice in connection with funding opportunities for the Night Shelter and work connected with it.	SHT & Housing Options	Ongoing	Early discussions commencing Oct 19
Work with hostels/ housing support providers to ensure there are severe weather emergency beds in addition to the Night Shelter available given assessed demand	SHT & Housing Options, RPs & Night Shelter	Ongoing	Early discussions commencing Sep 19
Explore the potential to have wrap around shelter including day provision when the Night Shelter is closed			
Work with Genesis Notting Hill to ensure a smooth transfer of their services including Park Road, Merchants Terrace and the rough sleep outreach service to a new provider following their decision to leave East Anglia	SHT & Genesis & New Provider	Ongoing	Early dialogue has commenced
Maintain a stakeholder group to help inform the strategy and update it	SHT	Jan 2020 on going	No progress
Establish & maintain collaborative working group with RP partners to respond to the gaps identified.	SHT	Jan 2020 on going	No progress
Work with internal colleagues & RP Partners to identify measures to monitor the impacts of UC on housing debt and homelessness.	SHT, Revenue services & RP partners	April 2020	No progress
Review contractual arrangements for year 3 of the Home group Community support service	SHT, NCC & internal procurement	Jan 2020	No progress

19. Monitoring and evaluation of the strategy and action plan

The effectiveness of this strategy is measured and monitored within the organisation, and beyond in a transparent way. In order to ensure this happens a set of measures have been selected that are detailed in **appendix C**. These are 12 measures that will be monitored

continuously and will help understanding around trends and help us evaluate the effectiveness of our actions. Where appropriate these will be presented using info -graphics to aid interpretation and will be useful for tracking changes over time. A suitable presentational format is currently being devised that will form the basis of future reporting.

We will review this action plan annually for the duration of the strategy. We will report our review findings to the council’s Environment and Community Panel and update the strategy and plan as necessary to reflect any changing circumstances. New actions will be prepared in 2020/2021.

20. Appendices

**A – The ‘Homes for Cathy’ 9
commitments**

**B– Homelessness Measures and
explanations**

C- Homelessness Measures Dashboard

D- Councils response to date