

# Consultation on housing costs for short-term supported accommodation

## **Question 1:** Do you agree with this definition? No Please comment

The definition is reasonable other than the two year limit could be removed. Most people don't need accommodation for more than a few months but some require lifetime low level support and without this they become trapped in a cycle of homelessness. Rather than having a timescale, the guidance could state that commissioners should decide on what is considered to be a reasonable timescale for the accommodation. Commissioners should also make it a condition that providers complete regular reviews to determine whether residents still need to be in supported accommodation and have action plans to help residents move into longer term accommodation. Without this condition, some providers could keep residents longer than required which would create bed blocking and a reliance on supported accommodation.

Point 89 – Who will determine whether accommodation meets the definition and how will the decision be made? Will this be dependent on what is stated within the licence agreement and rent charges or the amount of hours of support provided etc? Guidance is required to ensure consistent and defensible decisions are made.

Please can the guidance clarify whether accommodation where support is provided on an adhoc basis would meet this definition? Some people might only require support for a short period of time such as in the first few weeks when assistance is required with making benefit claims. There would be no point providing them with continued support if this was not required.

## **Question 2:** What detailed design features would help to provide the necessary assurance that costs will be met?

The model as per point 92 is a huge improvement and will provide more assurance for providers than the current system and help residents to move into employment rather than block them from taking on employment. This is a very positive step forward. The housing providers will need to know what funding they are to receive and over what term to enable them to plan and employ staff.

Without knowing the amount of funding that will be received or what other funding streams housing providers receive it is difficult to provide any assurance that costs will be met. Providers are currently struggling to meet demand and often have to decline to accommodate those considered high risk and those with high support needs. Without additional funding, providers can't be provided with assurance that costs will be met to meet the needs of those requiring accommodation. Commissioners will need to decide on the type of supported accommodation required and ensure sufficient funding is provided to ensure providers will provide the service.

Where the assessed level of demand falls below the number of bedspaces that are available in a purpose built property such as a hostel, if funding is limited to meet just the demand, could the accommodation become financially unviable if the funding isn't sufficient for the provider to meet their running costs. This is something that commissioners might need to consider.

**Question 3:**

a) Local authorities – do you already have a Supported Housing plan (or plan for it specifically within any wider strategies)? No

~~b) Providers and others with an interest – does the authority (ies) you work with involve you in drawing up such plans? [Yes/No]~~

c) All - how would the Supported Housing plan fit with other plans or strategies (homelessness, domestic abuse, drugs strategies, Local Strategic Needs Assessments)?

a) No

b) NA

c) The supported housing plan would need to take account of identified need as per the other strategies/plans but it would also have to take account of the amount of funding that was available as this will determine what can actually be provided. For non-unitary areas this will be more complex because there could be many different strategies that need to be considered.

**Question 4:**

a) Local authorities – do you already carry out detailed needs assessment by individual client group? Occasionally

~~b) Providers – could you provide local government with a detailed assessment of demand and provision if you were asked to do so?~~

All – is the needs assessment as described in the National Statement of Expectation achievable? Yes

C) Please comment

The National Statement of Expectation document is not very clear or concise about the requirement to complete a needs assessment or what should be included. The information can be obtained from the document but it could be much clearer. However this should be achievable but will be a big piece of work involving many agencies and much deliberation and conciliation.

**Question 5:** Do you agree with this approach? Yes. Please comment.

Yes this approach will work especially where specialist accommodation is required within the county but not within every district. The needs of each district will need to be protected and this will hopefully be achieved through having a countywide strategic plan based on need. However, it might be better if the grant conditions make reference to the district authorities having to be in agreement with the plan before it can be adopted by the upper tier authority rather than just stating "the upper tier to develop the plan in cooperation with the district authorities". Without a joint approach, is there a risk of upper tier authorities using the funds to provide supported accommodation to only meet their own key priorities?

**Question 6:** The draft National Statement of Expectation (see Section 4) published today sets out further detail on new oversight arrangements and the role of local authorities. We would welcome your views on the statement and suggestions for detailed guidance.

The National Statement of Expectation document again is unclear about what is expected. To make it clearer could be a section called Governance Arrangements and another called "The role of local authorities" This could include how the upper tier authority could be held to account to make sure the funding is used appropriately and meets local priorities that were agreed by all relevant parties.

We assume this is covered by the Transparency sections. It is unclear whether this work will be completed by first or second tier authorities or both. This work is required to ensure service provision can be monitored to ensure its fit for purpose but this will create additional work for already over-stretched authorities. Funding might be required to enable this work to be carried out to an acceptable standard.

**Question 7:** Do you currently have arrangements in place on providing for those with no local connection? Yes If yes what are your arrangements?

The county council commission a range of hostels and refuges, all of which allow access to those without a local connection but for a limited number of rooms and timescales. This protects the interested of local people in need and is required in some districts more than others such as coastal districts and cities which attract people from away.

**Question 8:** How can we help to ensure that local authorities are able to commission both accommodation and associated support costs in a more aligned and strategic way? Do you have further suggestions to ensure this is achieved?

Guidance on how to assess the level and type of supported accommodation required would be helpful. Each partner will have their own interests such as mental health, learning disability, domestic abuse and to ensure a fair spread of accommodation is provided for each group a robust and equitable system needs to be in place to ensure the correct range of accommodation is provided. It shouldn't be down to who shouts the loudest. The local housing authorities and current providers will have extensive knowledge of any groups that are being failed due to lack of accommodation or appropriate support.

**Question 9:** How will you prepare for implementation in 2020, and what can the Government do to facilitate this?

Workshops attended by key partners including, housing and support providers will be required in order to prepare for the implementation. This will be to identify how much money is likely to be available, what services are required compared to what currently exist, how they are currently funded and whether they would be exempt from Housing Benefit. Providers will need to know by early 2019 whether they will continue to receive funding from 2020 and if yes, how much and what would be expected of them. Some providers might not be receiving any funding at present and could request funding placing more demand on an already under-funded service.

There could also be a need for providers to create exit strategies if they are no longer going to receive funding.

This implementation will need to be overseen to ensure strategic direction is provided and progress monitored and kept on track. It

would need to be decided on what form this took and who would be involved.

**Question 10:** What suggestions do you have for testing and/or piloting the funding model?

Not decided as yet.

**Question 11:** If you have any further comments on any aspects of our proposals for short-term supported housing, please could you state them here.

Providers are currently under-funded to meet demand and can generally only provide accommodation for those persons with low support needs. This needs to be considered when determining the level of funding. Simply providing an equal amount to that currently being spent will not be sufficient to meet demand.