

Responses to Homelessness Strategy Consultation

<p>Paul Garnett Housing Benefit</p>	<p>Amendments required regarding Housing Benefit:</p> <ul style="list-style-type: none"> ▪ Page 9, 5.1.2. – The Halton Service should be The Benefit Service. ▪ Page 47-48, 5.6.2. – Two major functions – subsidy and discretionary housing payment – wording not appropriate. Discretionary payment is only £30,000 out of £40 million so not a major function. Take out the part about two major functions and just say ‘HB Department last year spent £40 million in HB helping people to afford their rented home. In addition, a small sum was paid out in discretionary housing payment to prevent hardship’. ▪ 5.6.3. – Penultimate sentence – ‘claims <i>usually</i> take less than...’ ▪ 5.6.5. – ‘From 1st April 2008, changed to Housing Allowance’. ▪ 5.6.7. – ‘Single room rent’ not correct – should be ‘shared room rate’. ▪ 5.6.8. – ‘Around 33,000’ – actually 29,500 for the New Year.
<p>Cllr. Marie Wright</p>	<ul style="list-style-type: none"> ▪ Nothing relating to repeat homelessness and how to address it. ▪ No mention of furniture recycling (major issue for those leaving hostel accommodation – no furniture = don’t sustain tenancy = repeat homelessness).
<p>Emmanuel Mensah Supported Housing Manager (Younger People and BME Services) Plus Dane Group</p>	<ul style="list-style-type: none"> ▪ Priority 1 – The council should consider setting up a specialist team solely responsible for interview / assessment of all 16 and 17 year olds guaranteed on the same day that they present themselves homeless. This would help to deliver the mediation agenda more effectively. Also, the council should work in partnership with RSLs to deliver ‘Your Housing Options and Issues’ awareness training to Year 10 and 11 pupils in secondary schools, particularly those who are about to be excluded from school, as evidence suggests they often end up homeless. ▪ Priority 2 – The council could work in partnership with RSLs to facilitate the development and employment of tenancy sustainment officers to work with all new tenants and existing ‘at risk’ (of failing tenancies through ASB or rent arrears) tenants. ▪ Priority 3 – The council should actively work in partnership with RSLs with a view to agreeing robust protocols to reduce the risk of failing tenancies, e.g. for ASB cases, use of mediation and floating support services and for arrears pursuance, use of human rights assessment and welfare benefit advice to

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	<p>maximise income.</p> <ul style="list-style-type: none"> ▪ Priority 4 – The council should consider addressing the need of BME elders for independent accommodation, access to translation service and BME panel / focus groups. ▪ Priority 5 – The council should ensure housing transfers and housing exchange policies are sensitive to the needs of BME households living in over-crowded homes. Also, the council should address the need for larger units of accommodation for BME communities and adequate permanent pitches for Gypsy and Traveller elders. ▪ Priority 6 – The council should consider managing / putting back into use empty properties and under-occupied properties, both private and otherwise. ▪ Priority 7 – The council should promote good practice to support RSLs and other landlords in raising performance standards. Also, the council should work with the North West Regional Assembly / North West Regional Housing Group (NWRHG) to direct investment towards improving access to housing where there is housing need.
<p>John Mackie Executive Director Halton YMCA</p>	<p>These are the combined comments from our Management Team on the three documents, the items we have not commented on are either not directly relevant to our work or we totally agree with the statements. We will be more than happy to discuss any of this document with you or other interested parties in the future.</p> <p>Executive Summary:</p> <ul style="list-style-type: none"> ▪ 4.5 – Halton YMCA statistics support this evidence and can provide these if required. ▪ 5.10 – Although this provision is adequate in Runcorn, there is a need for this in Widnes, which Halton YMCA is currently working on with Cosmopolitan HA. ▪ 5.14 – Halton YMCA strongly agree with this statement, especially in regard to the NEET and has evidence to support this if required. ▪ 6.4 – This confirms our evidence of a need for a similar foyer in Widnes, which Halton YMCA aims to provide. ▪ 6.6 – This particular recommendation is a driver of Halton YMCAs current business plan. <p>Recommendations:</p>

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- R22, 2nd point – Halton YMCA is matrix accredited for this provision.
- R22, 3rd point – Currently, Halton Haven Hospice is in talks with Halton YMCA regarding their furniture provision based on Picow Farm Road.

Homelessness Strategy Part 1:

- 5.19 – This ties in with our Widnes project, including those leaving care.
- 5.40 – Halton YMCA strongly agree with the need to support residents with benefits advice including ‘better off calculations’.
- 4.26 – Halton YMCAs proposed new foyer in Widnes will include a mother and baby, which will help to improve the current statistics.

Mental Health and Homelessness:

- 5.54 – Halton YMCAs statistics for 2008 show that 25% of our residents are suffering from minor mental health issues and we are therefore working on a strategy to improve mental health and well being.

Conclusions and Recommendations (Page 50):

- D – Halton YMCA is actively working towards providing this support within its hostel and would welcome a multi-agency approach to support this initiative.
- E – Halton YMCA training has, for a number of years, been providing this training skill and financial information to the community and would welcome a link with current RSLs in Halton to discuss expanding this.
- 6.9 – This should read ‘direct access’ not ‘emergency access’.
- 6.11 – We would like to refer once again to the need for a hostel in Widnes, which we aim to provide.
- 6.22 – As above.

Recommendations (Page 55):

- 6.25 (R23) – Halton YMCA support the development of a common move on process and protocol. We would like to see a copy of the Mental Health Strategy, which we were not aware of.

Homelessness Strategy Part 2 (Housing Solutions Planned Moves, Page 8):

- 4.13 – Halton YMCA welcome this initiative for consistency in homeless provider projects.

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	<p>Key Activities:</p> <ul style="list-style-type: none"> ▪ 4.19 – Halton YMCA welcome partnership working within communities, i.e. children and youth centres and schools, building on previous experience of working in this area. ▪ 4.25 – Halton YMCA would welcome partnerships in regard to ‘worklessness solutions’ for residents of Halton and has worked in this area for the past three years. ▪ 5.4 – Highlights again the need for homeless accommodation in Widnes, which we intend to provide. ▪ 6.7 – Halton YMCA will continue to deliver ‘places to go – things to do’, contributing to positively impact on anti-social behaviour and would welcome working in partnership with RSLs and housing solutions.
<p>Joanne Sutton Housing Strategy</p>	<ul style="list-style-type: none"> ▪ On the whole, the review and strategy are really comprehensive and well laid out. ▪ The review / strategy should perhaps consider the use of empty homes as a way of increasing the supply of housing – this has not been an issue in the past but is now coming to the fore. ▪ The action plan is very detailed but a column to show who will lead and deliver the actions would be helpful. ▪ The comments were tracked within the documents – typos, grammatical / spelling errors etc. were highlighted, as well as issues with page and other numbering, but detailed below are the comments relating to content. <p>Introduction and Executive Summary:</p> <ul style="list-style-type: none"> ▪ Page 4, point 2.8 – seems a bit strange to have this sentence at the end, particularly as it does not fit with the description of a deprived borough in this paragraph. ▪ Page 12, point 7.1 – is 1720 the total number of households on the waiting list during the whole year? This figure is normally presented as a snapshot. ▪ Page 12, point 7.3, 2nd sentence – this is inaccurate – the HNS found a shortfall of 176 affordable homes per annum but recommended that these should be split between rented and shared ownership housing. Plus, the 500 homes (also per annum) is a floor target, which is set by the NW Regional Spatial Strategy and which, in any case, is increased by the Growth Point. Suggest changing to ‘Minimum targets for new development in the borough contained in the latest North West Regional Spatial Strategy have increased (300 to 500 per annum) and there are plans to develop an additional 100 homes per annum as part of the Growth Point programme. The council along with its Growth Point partners (Warrington and St. Helen’s

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councils) will be working with the Homes and Communities Agency and private developers to maximise provision of affordable housing as part of the programme’.

- Page 13, point 7.8 – should perhaps read ‘the prospect of a *possible* [as opposed to *significant*] downturn...’
- Page 13, point 7.8, 1st sentence – whilst there are less buy-to-let mortgages available, experience shows that households unable to sell are choosing to rent their homes instead until the market picks up, therefore, the downturn in the PRS may not be as certain or significant as suggested here.
- Page 14, point 8.2 is repeated.
- Page 14, point 8.3 – if prospects are uncertain, how do we know they will be bleak?

Part 1 – Strategic Review:

- Page 7, point 5.1 – suggest changing the last sentence to read ‘The population is now relatively young but ageing, there is little inward migration and according to the 2001 Census, the ethnic minority population is less than 2% of the whole (although it is likely that the ethnic minority population is now higher following accession of the A8 European countries).’
- Page 8, point 5.8 – income levels in Halton are lower than in other areas.
- Page 9, point 5.15 – Housing Strategy is 2008 to 2011 not 2013.
- Page 9, point 5.15, 4th bullet point – delete ‘with a target of 176 dwellings a year’.
- Page 15, point 3.2, 3rd bullet point – the landlords forum was established before the homelessness strategy and accreditation scheme. Also, the scheme is more about improving conditions and management standards in the sector rather than increasing capacity.
- Page 16, point 3.2 – consider mentioning the Hough Green Road development here.
- Page 16, point 3.3, 2nd bullet point – the housing partnership predates the last homelessness strategy. This implies that the strategy was instrumental in the development of the partnership.
- Page 16, point 3.3, last bullet point – this needs updating as it says the Nightstop Services was *due* to start in *2008*.
- Page 25, chart 11 – could this chart be clearer? Also, homelessness is spelled incorrectly in the chart title.

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- Page 27, chart 12 – could the abbreviations be set out in full?
- Page 29, chart 16 – the final 4% of the pie chart is not listed in the legend.
- Page 39, point 5.12 – sentence should read ‘including a £40k *reduction* in council tax...’
- Page 47, point 5.62 – acronym needs to be explained – Discretionary Housing Payments (DHP).
- Page 56, point 7.2 – suggest that it should read ‘restricted to one offer (*in their choice of either Runcorn or Widnes*)...’
- Page 57, point 7.6 – suggest that it should read ‘Halton Borough Council plans to introduce Choice Based Lettings (CBL) in 2010...’ and ‘properties will be well matched *helping to improve prospects of tenancy sustainment*...’
- Page 57, point 7.7 – suggest it should read ‘which can impact negatively on homeless households *if not modelled and managed effectively*’.
- Page 57, point 7.8 – suggest that the last two sentences should read ‘The Regional Spatial Strategy sets a minimum target for the provision of 500 new homes per annum in Halton. Halton’s status as a Growth Point, in partnership with St. Helen’s and Warrington councils, will see the development of an additional 100 homes per annum. The council will be working closely with the new Homes and Communities Agency to maximise affordable housing in the borough. This *will* reduce some of the pressure on the register and any future scheme.’
- Page 57, point 7.10, 2nd sentence – this is very limited and only applies to certain categories of HMOs.
- Page 59, point 7.17, 1st sentence – there is nothing in the housing strategy about this – perhaps it was sourced elsewhere?
- Page 59, point 7.18 – suggest it should read ‘A permanent *council owned* encampment...’
- Page 61, point 7.34, 2nd sentence – anecdotal evidence shows that households unable to sell are renting their homes out, therefore, downturn in the PRS due to reduced buy-to-let activity may not be as severe as expected.
- Page 62, R25, point iii - acronym needs to be explained – Community Care Grants (CCG).
- Page 64, point 8.8 – suggest it should read ‘coupled with a limited *re-let* supply...’
- Page 65, point 8.18 – reduction in stock may not be as severe as expected due to anecdotal evidence,

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	<p>which suggests that those unable to sell their homes are renting them out (as mentioned above).</p> <p>Part 2 – Homelessness Strategy:</p> <ul style="list-style-type: none"> ▪ Page 11, point 5.1 – Housing Strategy is 2008 to 2011 not 2013.
<p>Mike McCue Policy Officer Halton Housing Trust</p>	<p>Background:</p> <ul style="list-style-type: none"> ▪ The draft Homelessness Strategy was circulated by the council to stakeholders for consultation on 12th February 2009. The council originally requested responses to be returned by 2nd March 2009. However, in response to a request from the trust the council agreed to the deadline being extended to 13th March 2009. This would then enable the trust to be able to provide a full and meaningful response. ▪ The trust would suggest that future consultation documents, especially of this length, provide a longer response timescale. This would encourage a wider range of responses. ▪ This response has been prepared following discussions between the Senior Management Team of the trust as well as a cross section of other staff with a professional interest in the homelessness service. Our response has been structured to provide some general comments that relate to the consultation exercise as a whole. This is followed by more specific comments / queries that are referenced to points within each of the three documents that formed part of the consultation documentation. <p>General Comments:</p> <ul style="list-style-type: none"> ▪ The trust generally agrees with the assessment of what was achieved by the earlier strategy. ▪ We are supportive of the direction of travel and emphasis of the new strategy, with its emphasis on preventative work / action. ▪ The trust believes the strategy provides a sufficient insight to the council’s thinking in dealing with homelessness issues and from this to be in a position to develop our own ‘mini-strategy’ for the trust on how, as a key, partner we can play our role in both preventing and dealing with homelessness. <p>However, the trust also has some general reservations concerning this consultation:</p> <ul style="list-style-type: none"> ▪ The documents are too lengthy. The use of three separate documents is thought to be questionable and sometimes confusing to follow. ▪ The strategy is difficult to read and understand, even for those people who are directly involved in this service area. The trust would suggest that the council considers producing a summary document, which

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would make the subject more accessible for both key stakeholders but also for residents.

- In some areas there is insufficient attention to detail in terms of the presentation. Examples have been highlighted in the detailed comments section of this response.
 - The trust believes there may have been a missed opportunity in not presenting this consultation at the draft stage to both the Halton Housing Partnership and the Homelessness Forum. By doing so the comments of both groups could have been canvassed and taken into account.
 - The strategy lacks sufficient detail on both accountability and monitoring arrangements of its delivery and in particular how progress against the strategy will be fed back to service users.
- Document 1 – Introduction & Executive Summary of the Strategic Review; Detailed Comments:
- Page 5, pt 2.8 – An ‘annual shortfall in affordable housing of 176 homes’ is mentioned. It is unclear whether this shortfall relates to social housing for rent only or includes an element of shared or low cost home ownership properties.
 - Page 7, pts 3.4 & 3.5 refer to some initiatives from the 2003 strategy still to be delivered including concerns about “a desire for stronger user consultation”. There does not seem to be any reference about how this could be addressed in the following 3 recommendations (R7, R8, and R9).
 - Page 8, pt 4.7 lists a number of challenges evidenced from the services involved in Multi Agency Monitoring that need to be addressed. The trust agrees with the list of challenges as stated, but wonders if there is an argument here to at least mention the difficulties of trying to address these in the context of the current and continuing economic downturn?
 - Page 8, R11 – Where this recommendation talks about ‘specific service developments and interventions focused on those who are most at risk’, should there be a reference in here to victims of domestic violence?
 - Page 9, 5.5 – Whilst in reality there may well be ‘a difficulty tracking outcomes’ ‘due to the one-off nature of many contacts’ as this point states, it does also beg the ‘So what?’ question. Is this situation likely to be addressed in some way? If it cannot be addressed easily is there a need to highlight that this situation may continue in the foreseeable future?
 - Page 9, 5.6 – As the integration referred to in this point was actually completed in October 2008, this point

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needs to be updated.

- Page 11, R16 – This particular recommendation does not seem to be advocating any new or change of approach in dealing with the issue relating to domestic violence/abuse. The trust finds this somewhat surprising; bearing in mind that figures obtained from the Data Observatory in December 2008 which illustrated that Halton had by far and away the highest incidence of domestic violence cases per 1000 population across the whole of Cheshire. This data is included within this response as an appendix for information.
- Page 11, R18 – This recommendation is to ‘Enable research into the homelessness-related needs of those with mental health problems and dual diagnosis...’ However this lacks information on how this will be achieved. Would the council look into actually funding such research itself?
- Page 12, pt 6.4 & R20 – Point 6.4 acknowledges the imbalance of short-term housing in Halton. Despite this the associated recommendation at R20 only seems to be targeted at certain client groups. It seems to leave the question about whether this imbalance of where the short-term housing is, unanswered.
- Page 13, pt 7.4 states there are ‘several challenges for CBL in relation to homeless prevention...’ and then provides three bullet points. Two of these bullet points do not appear to be challenges. CBL schemes invariably put homeless cases in high bands anyway and the whole thrust of these schemes is around providing greater levels of genuine choice. Research on CBL schemes actually demonstrates that they improve the housing opportunities for homeless groups compared to traditional allocation policies.
- Page 14/15, R25 – The second bullet point in this recommendation relates to gypsies / travellers. This appears to be the very first reference to this client group in the document. Nothing seems to be said about this group in any of the earlier points in this section. We would also query whether this also fits within the section on the Private Rented Sector.
- Page 15, pts 8.1 & 8.2 – Both these points say exactly the same thing. Is this simply duplication or has some text been missed out inadvertently?

Document 2 – Part 1 Strategic Review; Presentational Issues:

- The text in a number of the ‘Figures’ boxes that are inserted at various points within the document do not show the bottom line of the text clearly.
- There is a numbering problem in both sections 1 and 2 of this document that needs correcting. After the

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section headings all sub points within each section start with the number 5.

- Appendix 3 listed on the contents page but not included in the document.
- Appendix 4 mentioned in 5.37 and 8.22 but not included in the document.
- Acronyms are used which are not explained sufficiently, e.g. pt 5.68 – ‘DHP’; and pt 7.37, R25 iii – ‘CCG’

Document 2 – Part 1 Strategic Review; Detailed Comments:

- Page 20, pt 3.12 mentions review consultation generally agreeing that much has been achieved. It also provides an example of ‘the shortfall of temporary accommodation in Widnes’ as some frustration being expressed. This issue and whether it is likely to be addressed is not referred to again within the document. (There is a cross reference here with the bullet point made on Page 3 of the trust’s response relating to page 12 of the Introduction and Executive Summary document).
- Page 40, pt 5.5 – This point starts ‘At the time of writing...’ and the text that follows appears to be a number of months old. This refers to the homeless service being in the process of going back under council control. As the integration referred to in this point was actually completed in October 2008, this point needs to be updated
- Page 56, pt 5.73 & page 57, pt 5.76 - Pt 5.73 refers to general satisfaction with provision but then lists five bullet points of areas that need to be developed. When reviewing the subsequent list of areas ‘identified for development work’ in pt 5.76 on the next page, two of these bullet points do not seem to have been covered; i.e. the first one – better knowledge of services, publicity, communication etc; and the fourth one relating to more user involvement in service development and design.
- Page 56, pt 5.74 –some form of explanation is required that links this point to the diagram inserted underneath it. As it is currently presented the reader doesn’t necessarily make this connection.
- Page 63, pt 6.24 – refers to the potential for re-modelling short-term accommodation. The possibility of offering units of RSL accommodation is mentioned as an example. Towards the end of the example, one sentence states that ‘Such schemes would need to be accompanied by support with furnishings’. It would be helpful to expand upon this point by providing further clarity on what level and who would provide this.
- Page 68, pt 7.26 – mentions furniture projects and states that ‘There are no such projects available in Halton’. The trust been supporting such a scheme run by Halton Haven for a number of months.

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- Page 74, pts 8.11 to 8.15 – All these points relate to debt and end with a statement that if left unchecked ‘could increase overall homelessness by at least 5% in Halton.’ There is no mention in here of consideration of a Mortgage Rescue Scheme as a preventative measure to tackle this issue. Similar Schemes have now been adopted and implemented by a number of neighbouring councils.
 - Page 78, User Consultation Events – there is a lack of any detail about these events. In particular how well they were attended and what were the key issues that emerged. As presented, it leaves the reader with the impression that only a low level of consultation has been carried out. This could be misleading.
- Document 3 – Part 2 Homelessness Strategy 2009-2013; Outline Action Plan Page 21:
- The Action Plan is difficult to follow. Part of this is due to the failed attempt to use a ‘repeat’ heading for the columns at the top of each page. Text from previous columns on the preceding page actually runs in to the repeat heading on the next page.
 - Some timelines are given as Q3/Q4 2008/09. If these have been met, does this need to be stated somewhere? If they have not been met then do they need to be revised?
- Document 3 – Part 2 Homelessness Strategy 2009-2013; Detailed Comments:
- Pages 3 and 4 Strategic aims and priorities – lists a total of 7 priorities, none of which appear to refer to user consultation.
 - Page 6, pt 2.1 - One of the measures of deliverable outcomes given is ‘elimination of the use of B & B as temporary accommodation for statutory homeless households by 2013’. Is this realistic in the current economic climate?
 - Page 9, pt 4.8 – Refers to shop front access to allow two arms of the service to work from one centre. When considering the earlier acknowledgement in other documents of an imbalance of short-term accommodation between Runcorn and Widnes, how will this proposal overcome the difficulty of covering two towns? Will this create a different imbalance relating to access to certain parts of the service?
 - Page 9, pt 4.9 – When considering earlier comments made in this response, there is a strong rationale to include domestic violence within the list of key risk groups listed in this section.
 - Page 10, pt 4.12 – Should the home visiting service mentioned here relate to ‘families under 16’?
 - Page 10, pt 4.16 - the measures given to ‘develop Home Search support’ in this point seem to be restricted

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	<p>to making things easier for users to access the systems. It does not seem to cater for the most vulnerable service users who may be unable to access or use the system to their best advantage, i.e. does the level of support needed here include support workers acting as ‘buddies’ for the most vulnerable cases who if necessary may bid on the user’s behalf?</p> <ul style="list-style-type: none">▪ Page 11, pt 4.20 – refers to landlord good practice sharing. Is this seen as part of the existing Halton Housing Partnership arrangements or is it something else?▪ Page 16, pt 6.5 – ‘Develop a good practice knowledge base...’ is given as a key activity. The last sentence states ‘These processes will involve user participation’. It would be helpful to provide some indication of how this would be practically delivered.▪ Page 17, pt 7.2 – ‘Develop clear and quantifiable outcomes...’ is given as a key activity. There should be some mention here about outcomes for users. For example, is it intended that satisfaction measures for users of the service would form part of this development?▪ Page 17 & 18, pt 7.3 – The bottom half of the table on page 18 gives some idea of the measurement of success in preventing homelessness. The list of measures given does not appear to cover all the preventative actions when compared to what is said in points 2.6 and 2.7 of the Introduction and Executive Summary document.
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