

February 2017



CLINKS
RESPONSE

Clinks' response to the DCLG and DWP funding for supported housing consultation

About Clinks

Clinks is the national infrastructure organisation supporting voluntary sector organisations working in the criminal justice system (CJS). Our aim is to ensure the sector and those with whom it works are informed and engaged in order to transform the lives of offenders and their communities. We do this by providing specialist information and support, with a particular focus on smaller voluntary sector organisations, to inform them about changes in policy and commissioning, to help them build effective partnerships and provide innovative services that respond directly to the needs of their users.

We are a membership organisation with over 500 members, including the voluntary sector's largest providers as well as its smallest. Our wider national network reaches 4,000 voluntary sector contacts. Overall, through our weekly e-bulletin Light Lunch and our social media activity, we have a network of over 15,000 contacts. These include individuals and agencies with an interest in the CJS and the role of the voluntary sector in rehabilitation and resettlement.

About this response

Clinks welcomes the opportunity to respond to this important and timely consultation on the future funding of supported housing. To inform our response, we convened a consultation event with Clinks members in partnership with Homeless Link, the national membership charity for organisations working directly with people who become homeless in England.

We have also based the response on a scoping exercise¹ we commissioned in partnership with Homeless Link which explored accommodation outcomes for people in contact with the criminal justice system following the Transforming Rehabilitation reforms (TR).² Homeless Link has submitted an independent response to the consultation, which we fully endorse and support.

Clinks is also a member of the Task and Finish Group convened by the Department for Communities and Local Government (DCLG) focusing on short term accommodation and will be working to represent our members as this work continues.

We have focused our response on the consultation questions that are most relevant to the work of our members and the clients they are supporting. Where appropriate we have grouped our responses to the questions.

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supporting voluntary organisations that
work with offenders and their families

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Introduction and background information

People in contact with the criminal justice system often experience unique and complex needs. Recent statistics show that:

- 15% of people were homeless before entering custody³
- 33% of all rough sleepers recorded in London had some experience of prison⁴
- 22% drank alcohol every day in the four weeks before custody⁵
- 25% of women in prison have symptoms indicative of psychosis⁶
- 23% men in prison are identified as suffering from both anxiety and depression⁷
- 7% people in contact with the CJS have a learning disability compared to 2% of the general population⁸
- As part of Homeless Link's latest Annual Review, it was reported that around 22% of tenants in residential homelessness services had previously been, or were currently, in contact with the CJS.⁹

These statistics alone suggest that for many people who have been in contact with the CJS, accommodation with support is likely to be more appropriate than an independent tenancy. Indeed, the consultation document itself says that "many people who rely on supported housing have multiple and complex needs and supported housing services often address a combination of these needs."

Although there is currently no centrally collated information about supported housing needs for people in contact with the CJS, a report by Sitra published in 2015 estimates that there were 5,423 people leaving prison without settled accommodation who needed supported accommodation in 2015/16.¹⁰ Indeed, the evidence review published alongside the consultation demonstrates that 1% of tenants in supported housing are people with a conviction. This translates to 4,500 units (a room or bed space) across Great Britain.

Summary of key recommendations

- To support positive accommodation outcomes for people in contact with the CJS, Clinks recommends that the Ministry of Justice (MoJ) develops a cross-departmental accommodation strategy.
- Clinks supports Homeless Link's recommendation that further work must be undertaken to accurately size the budget for housing costs and clear plans should be implemented to outline how the funding will grow over time to meet future need. Clinks recommends that the top-up funding is reviewed at least on an annual basis.
- There should be a statutory duty for local authorities to assess local supported housing need, in collaboration with other local agencies in health and criminal justice, and to develop a supported housing strategy that demonstrates how those needs will be met.
- Local authorities need to provide flexible but systematic routes for voluntary sector organisations to share intelligence about emerging needs of their clients and advocate for service improvements.
- Department for Communities and Local Government (DCLG), in partnership with other government departments, should clearly define vulnerable groups to include people

with a conviction. To further support local authorities, Clinks recommends that DCLG develop and issue guidance to local authorities about interpreting the definition of vulnerable groups and how local authorities need to work to meet their needs.

- It is important that supported housing providers and their clients are fully informed about the changes to the funding for supported housing and how this is likely to impact them and their services. We recommend that DCLG and Department for Work and Pensions (DWP) provide up to date and frequent guidance to supported housing providers, and work in partnership with them to promote accessible guidance to their service users.
- As there are mixed views within the supported housing sector as to the most appropriate definition and funding model for short term accommodation, DCLG should continue to engage with relevant experts through this consultation and the short term accommodation Task and Finish Group.

Response

Consultation question: *How should the funding model be designed to maximise the opportunities for local agencies to collaborate, encourage planning and commissioning across service boundaries, and ensure that different local commissioning bodies can have fair access to funding?*

As the intention is for DCLG to devolve top-up funding to providers, it is essential that this is supported by clear strategy, accountability framework and guidance to support local authorities undertaking their new commissioning responsibilities.

Reciprocal relationships and flexibility

Local authorities are required to determine whether someone has a local connection to that area before they start to process any housing application. Someone is defined as having a local connection if they already live there, have close family living there or if they work in that area.¹¹ During Clinks' consultation with our members they said that for some people in contact with the CJS, returning to the area they lived in before prison is not appropriate, safe and in some cases can lead them to reoffend. It is important that service users are consulted when resettlement decisions are taking place.

Further to this, a report by the Prison Reform Trust and Women in Prison shows that as women are often imprisoned considerable distances from the community they lived in, it can be challenging for them to both liaise with the relevant housing organisations and meet eligibility criteria.¹²

Clinks recommends that the funding model is designed to enable flexibility and encourage reciprocal relationships between local authorities that will enable people who have offended to receive housing support from a local authority where they do not have a local connection.

It is important to note that due to a lack of appropriate housing for women, they are often offered accommodation outside their existing community. Whilst this may be appropriate for some, for others it takes them away from their support networks and services they were engaging with, making it more challenging for them to rehabilitate. As highlighted by the Prison Reform Trust and Women in Prison "being relocated to a new area is a high price to pay for housing."¹³



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Clinks and Homeless Link's recent scoping exercise of accommodation outcomes for people since the implementation of Transforming Rehabilitation supports this. It found that in some cases people were placed in temporary accommodation outside of their local area, making it challenging for them to access services. This was of particular concern for people who had substance misuse or mental health problems and needed to access services quickly.¹⁴

Encouraging collaboration

As securing safe and appropriate accommodation is an essential part of the rehabilitation process for people in contact with the CJS it is important that there is collaboration between criminal justice and housing agencies in order to support people to turn their lives around.

Clinks recommends that the MoJ develops a cross-departmental accommodation strategy to support positive accommodation outcomes for people in contact with the CJS.

The strategy should be developed in collaboration with relevant stakeholders, including Community Rehabilitation Companies, the National Probation Service, prisons, voluntary organisations, service users and local authorities. The strategy will need to consider the roles and responsibilities of each of these stakeholders and take into account geographical differences including those between England and Wales.

As highlighted by the consultation document and accompanying evidence review, people who require supported housing are likely to be experiencing multiple and complex needs. This makes it essential that the new funding model promotes and enables collaboration across different agencies—including substance misuse, mental health and criminal justice organisations.

One example of how this can be done is through adopting the principles of the MEAM Approach. Clinks is a member of the Making Every Adult Matter (MEAM) coalition, alongside Homeless Link and Mind. MEAM currently supports 27 areas across the country to improve local responses for people experiencing multiple needs. Fifteen of these areas are using the MEAM Approach – a nonprescriptive framework to help local areas design and deliver better coordinated services.¹⁵

Although each MEAM Approach area delivers differently, all bring together a partnership of voluntary and statutory agencies that commit to designing a coordinated and flexible response for people experiencing multiple and complex needs. In many MEAM Approach areas, for instance Sunderland and Basingstoke, the partnership is led by the housing department of the local authority, and has helped them to create strong strategic and operational links with other agencies.

Consultation question: *How can we ensure that local allocation of funding by local authorities matches local need for supported housing across all client groups?*

In order to ensure the local allocation of funding by local authorities matches local need, there needs to be considerable and proactive steps taken both nationally and locally to determine what need exists and forecast what need is likely to exist, to ensure the supported housing needs of those populations can be met.

Clinks recommends that there should be a statutory duty for local authorities to assess local supported housing need, in collaboration with other local agencies in health and criminal justice, and develop a supported housing strategy that demonstrates how those needs will be met.

Engaging with voluntary organisations and their clients

Voluntary organisations working in the CJS are diverse in terms of their size and in the range of services they provide. As they are often embedded in their local communities, they have substantial knowledge and expertise about the local communities they work in, the service users they work with and the strategies needed to meet their service users' needs.¹⁶

Clinks recommends that local authorities provide flexible but systematic routes for voluntary sector organisations to share intelligence about emerging needs of their clients and advocate for service improvements.

To support someone on their journey to desistance – which is the highly individualised process by which someone may reoffend before stopping altogether – it is important that interventions are not done to someone but they are done with them. It is therefore important that when determining whether someone in contact with the CJS requires a supported housing placement, that this takes into account the wishes of the service user and is done in partnership with them where possible.

Many voluntary sector organisations facilitate service user involvement, to listen to their clients' views and involve them in service design, delivery and evaluation. These approaches amplify the voices that usually go unheard, to make sure services benefit from the insights of experts by experience.¹⁷

Clinks recommends that local authorities engage with existing service user involvement networks facilitated by voluntary organisations, especially supported housing providers, to enable service users to strategically inform how supported housing placements are delivered.

Joint Strategic Needs Assessments

Joint Strategic Needs Assessments (JSNAs) look at the current and future health and social care needs of the local community – these are needs that could be met by the local authority, Clinical Commissioning Groups or the NHS Commissioning Board. Under the Health and Social Care Act 2012, local authorities and clinical commissioning groups have equal and joint duties to prepare JSNAs through health and wellbeing boards.¹⁸

Clinks recommends that the relevant local authority housing lead is represented on the health and wellbeing board to ensure the housing needs of the community are identified.

JSNAs should consider "how needs may be harder to meet for those in disadvantaged areas or vulnerable groups who experience inequalities."¹⁹ It is positive that some of these groups are specifically highlighted as including people who are experiencing multiple needs and/or have a conviction. However, these groups act as a guide and JSNAs are not required to explore the needs of these populations.

Clinks recommends that JSNAs include a specific focus on the needs of people with convictions and those who experience multiple and complex needs. This will ensure JSNAs can be a useful tool for determining supported housing needs.

Collaboration with the CJS

Transforming Rehabilitation (TR) is the name given to the government's programme for how people in contact with the CJS are managed in England and Wales from February 2015. The programme has involved the outsourcing of a large portion of the probation service in England and Wales. The reforms have replaced the previous 35 individual Probation Trusts with a single National Probation Service, responsible for the management of high-risk offenders; and 21 Community Rehabilitation Companies (CRCs) responsible for the management of low to medium risk offenders in 21 areas across England and Wales. The CRCs will also have a new responsibility for supervising short-sentence prisoners (those sentenced to less than 12 months in prison) after release.

Due to the Transforming Rehabilitation reforms, Community Rehabilitation Companies are now responsible for providing resettlement services to prisoners in the last three months of their sentence. According to the Target Operating Model published by the MoJ, resettlement services "must include providing direct support in custody in helping offenders find accommodation."²⁰ As highlighted in a joint inspectorate report "however effective the new arrangements are, they will be undermined if offenders cannot access stable accommodation when they leave prison."²¹

To understand how the accommodation needs of people in contact with the CJS are being met since the implementation of TR, Clinks and Homeless Link commissioned a short scoping exercise. This included desk-based research, as well as interviews with key stakeholders, including voluntary sector providers, local authorities and prisons. The scoping exercise explored outcomes for people being supervised by CRCs and the National Probation Service (NPS).²²

Due to the implementation of TR, a systematic screening tool called the Basic Custody Screening Tool part 2 (BCST 2), is conducted by the CRC within five days of the initial screening tool being completed by prison staff. For all sentenced prisoners, the resettlement plan is reviewed 12 weeks before release. During the last 12 weeks of someone's sentence, CRCs are required to take action on the resettlement plan developed on the basis of the BCST 2. Our scoping exercise heard of one CRC that was more flexible, sometimes undertaking this work before the 12-week period specified, which was generally felt to support better pre-release planning and support.

The BCST 2 should help determine whether someone on release from prison is likely to need a supported housing placement. It is essential that this information is communicated by the CRC to the relevant local authority as early as possible to ensure their clients' housing need can be met. For this to take place there needs to be strong operational and strategic links between CRCs, the NPS and local authorities. To support these relationships and better housing outcomes for people in contact with the CJS, Clinks recommends that the Ministry of Justice and DCLG create an accommodation strategy; more detail is given on page 3.

As highlighted in the recently published white paper, *Prison Safety and Reform*,²³ performance measures or standards will be introduced for prison governors, who will be empowered to have greater autonomy over how they commission services to meet the specific needs of their population. These performance measures include those relating to work, education and housing. The paper outlines that the MoJ "will look at the rate of prisoners in suitable accommodation on release, compared to before they entered custody, so we can use that information to increase the number of offenders that have

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somewhere to live when they are released and track progress.”²⁴ To encourage partnership working, a joint outcome measure will be introduced for both prisons and probation.

To enable prison governors to achieve their desired accommodation outcomes, it will be important for them to ensure there is effective communication with local authorities to ensure the supported housing needs of people leaving prison can be met.

However, as Clinks highlighted in our response to the white paper, it is also important for the MoJ and the National Offender Management Service (NOMS) to ensure that the metrics used to measure prison effectiveness get much closer than is suggested by the white paper to the kinds of transformation needed to support lasting change.²⁵ There is a danger otherwise that the setting of targets, e.g. for settled accommodation, will remain very blunt institutional tick-box measures rather than conveying meaningful information about the distance travelled by individuals.

Allocating funding according to need

During Clinks' consultation with our members, they highlighted that providing appropriate placements for people who have criminal convictions can often be very costly. Due to the multiple and complex needs of many people in the justice system, and the risks some people pose to themselves or others, there often needs to be a higher staff-client ratio to ensure that needs can be appropriately met and that risks are mitigated. Clinks members felt that it is these services that are likely to be the most at risk with the proposed funding mechanism, due to their higher cost.

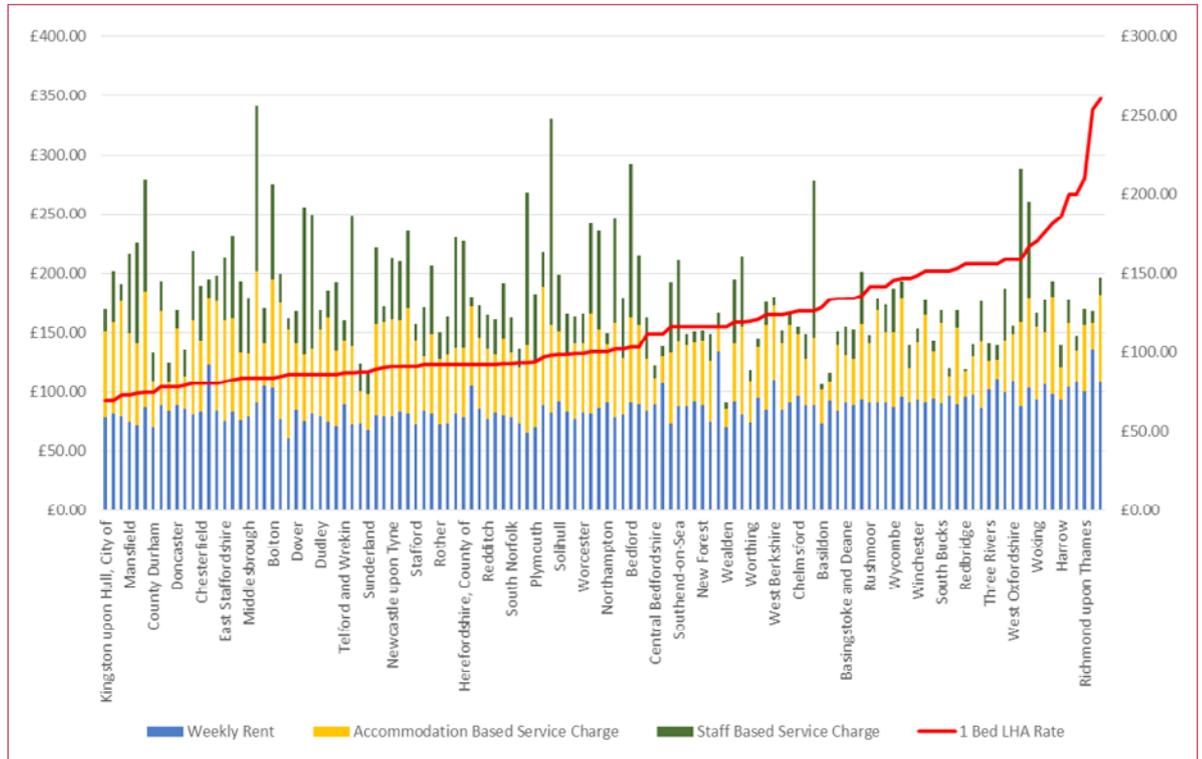
If the needs of the population are determined purely by headcount numbers, Clinks members highlighted concern that there may not be an appropriate allocation of funds to meet those needs. Members therefore suggested that the top-up funding includes a tariff element for certain vulnerable groups, including those who have offended, to provide enough resource to meet their needs. This is also likely to provide local authorities with an incentive to ensure appropriate support is provided for people who have a conviction.

Accounting for regional differences

There are considerable regional differences in the levels of Local Housing Allowance. This means that in some areas it will cover both the rent and service charges but in others supported housing services would be solely reliant on the devolved top-up fund for their services. Graph 1 on page 8 demonstrates these regional differences for Home Group's services.*

As highlighted by Home Group, this could create a perverse incentive for the development of supported housing provision in high value areas which threatens the viability of services developed in lower value areas. Clinks supports Home Group's assertion that it is essential the government recognise and take proactive steps to amend the funding formula to account for these geographical differences.

Graph 1
Average rent and service charge by local authority compared to 1 bed LHA rate - all services



Consultation question: *Do you think other funding protections for vulnerable groups, beyond the ring-fence, are needed to provide fair access to funding for all client groups, including those without existing statutory duties (including for example the case for any new statutory duties or any other sort of statutory provision)?*

Securing stable and appropriate accommodation is essential for enabling people to progress on their journey to desistance. Indeed, a joint criminal justice inspection published by HM Inspectorate of Prisons says “offenders themselves consistently tell us during inspections how important having somewhere secure and stable to live and something constructive to do, is to staying out of trouble when they are released.”²⁶

The importance of securing suitable and stable accommodation to enable someone to turn their life around is recognised by the MoJ and NOMS and reflected by the white paper Prison safety and reform.²⁷ CRCs are also measured by their accommodation outcomes; they have a target of 90% of people leaving prison going to settled accommodation.

However, accommodation outcomes for people in contact with the CJS are worsening. The most recent annual report published by HM Inspectorate of Prisons highlights that support for people leaving prison without accommodation is variable across England and Wales.²⁸ In some areas, the number of people leaving prison with no fixed abode has risen – for example in HMP Rochester the level had risen in the previous six months to 6%. Another example is HMP Wormwood Scrubs where the proportion of prisoners who had accommodation on release had fallen from 95% to 60% since the new CRC took over resettlement services. The prison was unable to explain this

fall.²⁹ A recent inspection report for HMP Exeter found that although there was a wide range of accommodation support on arrival and before release, there were still 27% of prisoners released without sustainable accommodation, which inspectors highlighted as an area for concern.³⁰

In addition, according to the most recent report from the HM Inspectorate of Prisons, the number of women leaving HMP and YOI Bronzefield with settled accommodation dropped from 95.5% in 2014 to 83.7% in 2015. One hundred and three women had left with no fixed address in the six months prior to the inspection and the prison had issued tents to two women who were released without anywhere to go to. The chaplaincy reported that they often gave out sleeping bags.³¹

Barriers to accessing appropriate accommodation

In 2002, the homelessness legislation was amended to extend the categories of people to whom local authorities are required to offer a full housing duty by virtue of priority need to include vulnerable ex-offenders.³² In theory, this amendment should make it easier for people with experience of the CJS to receive support to alleviate their homelessness. However, as Clinks and Homeless Link have previously highlighted,³³ there is evidence to suggest that tests used by local authorities to identify applicants who are in priority need are not always applied consistently or correctly, including cases involving "vulnerable prisoners with severe depression, autism, mental illness and significant learning disabilities".³⁴

Further to this, landlords in both the social and private sector often have concerns about the ability of individuals to manage a tenancy when they have a criminal record due to issues such as a lack of address history/references and past evictions. People may have also been involved in anti-social behaviour. These concerns can, in some cases, unfairly prejudice people's applications for housing.³⁵ **One way to address this is by delivering training to support people to develop and demonstrate that they have the skills necessary to maintain a tenancy.**

As part of assessing whether they have the duty to house someone, local authorities in England conduct an intentionality test. In Wales the local authority is not required to test for intentionality. Stakeholders in Clinks and Homeless Link's joint scoping exercise told us that some local authorities find people to be intentionally homeless by virtue of them committing a crime or breaching a court order in the knowledge that this could result in spending time in custody, which could result in the loss of the home. Indeed, one stakeholder who worked for a voluntary organisation said, "we are seeing more and more boroughs seeing ex-offenders [as not a] priority need as you are intentionally homeless – you committed the crime knowingly." This is more likely to be the case when offending is linked to accommodation, for example through Anti-Social Behaviour at a property.³⁶

Clinks recommends that the DCLG develops guidance and training, in partnership with the MoJ, to support them to appropriately interpret the intentionality test.

People in contact with the CJS as a vulnerable group

We support the government's intention to ring-fence the top-up funding for vulnerable people, and recognise that because many people relying on supported housing experience multiple needs, it is challenging to separate out the funding between different client groups. However, Clinks members highlighted considerable concern that because people in contact with the CJS are likely to experience particular barriers to accessing appropriate and stable accommodation, unless protections were introduced for this group, there is a risk that their housing needs would not be met.

Indeed, there is also evidence to suggest that there are increasing numbers of prospective tenants who have been refused access to supported housing because their needs were either too high or too complex. It is likely that, for many, these needs relate to current or previous contact with the CJS. As previously highlighted by Clinks and Homeless Link, housing providers say that substantial reductions to staffing hours and levels of specialist staffing, brought about as a result of overall funding cuts to services, have played a considerable part in the emergence of this trend.³⁷

Clinks members told us that under the proposed funding arrangement there is a danger that people with a conviction will be a low priority and that the needs of other groups will be prioritised.

Clinks recommends that DCLG, in partnership with other government departments, clearly define vulnerable groups to include people with a conviction. To further support local authorities Clinks recommends that DCLG develop and issue guidance to local authorities about interpreting the definition of vulnerable groups and how they need to work to meet their needs.

Clinks supports Homeless Link's recommendation that any new duties should be reviewed alongside existing duties to vulnerable groups, such as those in the Care Act and those proposed in the Homelessness Reduction Bill, to reduce duplication and identify any gaps.

Consultation question: *What expectations should there be for local roles and responsibilities? What planning, commissioning and partnership and monitoring arrangements might be necessary, both nationally and locally?*

Although there is no nationally collated data about the supported housing needs of people in contact with the CJS, a report by Sitra published in 2015 estimates that there were 5,423 people leaving prison without settled accommodation who needed supported accommodation in 2015/16.³⁸ Further to this, many people in prison or serving their sentence in the community have high levels of need, including mental health and substance misuse issues, meaning they often require supported accommodation.

To ensure that the accommodation needs of people in contact with the CJS are met, it is essential that there is information sharing arrangements and collaboration between local health and criminal justice agencies, including CRCs, the NPS and prisons, and local authorities. This would also help to address the "disruption and confusion" reported by some stakeholders in Clinks and Homeless Link's scoping exercise, about the responsibilities of probation services and local authorities since the implementation of TR.³⁹

I Clinks recommends that each local authority develops a multi-agency housing strategy.

This should also help to support CRCs, the NPS and prison governors to achieve their prescribed accommodation outcomes. To ensure oversight and accountability, this needs to be supported by a national accommodation strategy, as recommended on page 3.

Consultation question: *We welcome your views on what features the new model should include to provide greater oversight and assurance to tax payers that supported housing services are providing value for money, are of good quality and are delivering outcomes for individual tenants?*

To determine what positive or successful outcomes look like for people using supported housing, it is essential that DCLG consult with people living in supported accommodation.

Clinks recommends that DCLG engage with the many supported housing providers that have service user involvement groups, to determine the outcomes that people who have had contact with the CJS – and that require supported housing – are looking to achieve.

Further to this, it is essential that any outcomes framework developed for supported housing takes into account and compliments existing frameworks across different sectors including health and criminal justice. Examples include the Public Health Outcomes Framework⁴⁰ and Justice Indicators of Performance,⁴¹ which both include reducing reoffending as an outcome measure. CRCs, the NPS and prisons are measured by their ability to reduce reoffending.

Clinks suggests that supported housing is not only measured by the reduction of reoffending, but by interim outcomes including measures such as increased confidence and independence which are key stepping stones to supporting someone on their journey to desistance.

Consultation question: *We are interested in your views on how to strike a balance between local flexibility and provider/ developer certainty and simplicity. What features should the funding model have to provide greater certainty to providers and in particular, developers of new supply?*

Consultation question: *Should there be a national statement of expectations or national commissioning framework within which local areas tailor their funding? How should this work with existing commissioning arrangements, for example across health and social care, and how would we ensure it was followed?*

During our consultation, Clinks members supported the development of a national commissioning framework. The framework should enable and encourage co-commissioning arrangements to facilitate partnership working across different sectors, including health and criminal justice. This should help ensure that the multiple and complex needs of people requiring supported housing are met.

If a national commissioning framework is established, it is essential that this is done in partnership with other government departments, including the MoJ.



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Ensuring greater sustainability

During our consultation, Clinks members said that longer term contracts would give organisations greater certainty and the stability to enable them to develop their services to most appropriately meet the needs of their clients. However, to ensure that smaller, voluntary sector organisations are able to deliver services, Clinks recommends that grant funding should be used to fund innovative, untested services, to allow for continuous development of the evidence base.⁴²

To encourage market diversity, and ensure that smaller organisations are able to take part in the commissioning and procurement process, it is important that local authorities carefully consider the impact of contract size on market diversity. Clinks recommends that wherever possible large contracts are broken into smaller lots to encourage and ensure market diversity. If local authorities are considering combining several existing contracts, an impact assessment should be carried out to assess the effect on market diversity.

Consultation question: *The Government wants a smooth transition to the new funding arrangement on 1 April 2019. What transitional arrangements might be helpful in supporting the transition to the new regime?*

Clinks recognises there are concerns about the timeframe for implementation.

Clinks supports Homeless Link's recommendation that the Government reviews the timeframe for implementing these proposals to allow for a robust 'test and learn' approach in line with wider Universal Credit implementation.

We also urge the government to learn from other reform programmes that were hampered by an overly-ambitious timescale, such as changes to probation services under Transforming Rehabilitation.

To ensure a smooth transition to the new funding arrangements it is important that DCLG and DWP pilot the new system in at least two different areas of the country, to allow for geographical differences in local housing allowance rates. Piloting the new funding system will also allow for any unforeseen challenges to be addressed before the system is fully implemented.

It is important that supported housing providers and their clients are fully informed about the changes to the funding for supported housing and how this is likely to impact them and their services.

Clinks recommends that DCLG and DWP provide up to date and frequent guidance to supported housing providers, and work in partnership with them to promote accessible guidance to their services users.

As well as this, it is important that criminal justice, health bodies and relevant voluntary sector organisations are informed about the changes to the funding of supported housing as the reforms develop.



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Consultation question: *We welcome your views on how emergency and short term accommodation should be defined and how funding should be provided outside Universal Credit. How should funding be provided for tenants in these situations?*

As highlighted by Clinks members, people leaving prison may need to access transitional or short term accommodation before accessing more long term provision. However, they were keen to highlight that short term accommodation should not be defined by length of time, as this could be an arbitrary measure and would not allow for sufficient flexibility. Taking steps to independent living, if indeed that is an outcome for someone, is highly personalised and people living in short term accommodation will need to be there for varying amounts of time.

Defining short term accommodation is therefore particularly challenging, as people use accommodation services differently. Clinks members told us that their services support people with a range of needs and therefore had a mixed funding portfolio to support their clients. Further to this, they highlighted that due to lack of alternative housing options and provision there is a lack of appropriate move-on accommodation for people living in short term services, meaning they may stay in those services longer than they need to.

As there are mixed views within the supported housing sector as to the most appropriate funding model for short term accommodation, and whether it should sit outside the benefits system or not.

Clinks recommends that DCLG continues to engage with relevant experts through this consultation and the short term accommodation Task and Finish Group. We encourage this work to continue alongside and after the publication of the green paper.

Clinks recommends that DCLG takes proactive steps to engage with providers not sitting on the short term accommodation Task and Finish Group, and also engages with service users to determine their needs and views about how short term accommodation should be funded.

Consultation question: *Do you have any other views about how the local top-up model can be designed to ensure it works for tenants, commissioners, providers and developers?*

The cost of supported housing

The evidence review published alongside the consultation is a useful tool to determine the current use of supported housing across different client groups. It shows for example that 1% of all supported housing across Great Britain is being used by someone with a conviction, 18% is being used by someone with a mental health problem and 3% is being used by people who have a substance misuse need. However, the information within the evidence review does not give a full account of the use of supported housing. Only 48% of local authorities responded to the survey used to generate the findings. It was also not possible to determine the representativeness of the information submitted by supported housing providers, meaning only the raw data was presented in the analysis. As such, the information is likely to be an underestimation of the current provision and usage of supported housing.

It is estimated in the evidence review that £4.2 billion is annually spent on supported housing across Great Britain. Given that it is likely to underestimate the use and cost of supported



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housing, Clinks' members questioned whether the funding that the government has committed to spending on supported housing is enough to fund current provision. Further to this, they highlighted that inflation and future demographic changes, such as the ageing of the population, were likely to mean that funding for supported housing would need to increase in the following years. Yet it was unclear if these changes have been taken into account by the government and if the top-up funding for local authorities will be a static, finite resource.

Clinks supports Homeless Link's recommendation that further work must be undertaken to accurately size the budget for housing costs and clear plans should be implemented to outline how the funding will grow over time to meet future need. Clinks recommends that the top-up funding is reviewed at least on an annual basis.

The evidence review also demonstrates use rather than need, making it important that other steps are taken to ensure the needs of the general population are assessed.

Conclusion

Clinks has also submitted a response to the Work and Pensions Committee and the Communities and Local Government Committee joint inquiry into the government's funding reform for supported housing, which gives the key concerns we have raised in this response.

We will continue to engage with the development of these reforms on behalf of our members.

Notes

1. The scoping exercise was conducted by Becky Rice, who submitted a report detailing her findings in May 2016. During the scoping exercise, which also included desk-based research, Becky conducted interviews for an average of 35-40 minutes with 15 stakeholders, including three members of Clinks' area development team. Stakeholders were from the voluntary sector, prisons and local authorities. They included voluntary sector organisations working both within and outside Community Rehabilitation Company supply chains.
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3. Ministry of Justice (2012) *Accommodation, homelessness and reoffending of prisoners*. Online: www.gov.uk/government/publications/accommodation-homelessness-and-reoffending-of-prisoners (last accessed 03.02.2017)
4. Prison Reform Trust (2016) *Bromley Briefings: Prison Factfile*. Online: www.prisonreformtrust.org.uk/Publications/Factfile (last accessed 7.02.2017)
5. *ibid*
6. Prison Reform Trust (2016) *Bromley Briefings: Prison Factfile*. Online: www.prisonreformtrust.org.uk/Publications/Factfile (last accessed 7.02.2017)
7. *ibid*
8. *ibid*
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Clinks supports, represents and campaigns for the voluntary sector working with offenders. Clinks aims to ensure the sector and all those with whom they work, are informed and engaged in order to transform the lives of offenders.

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