

March 2017



CLINKS  
RESPONSE

# 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

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## 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 inquiry into the government's funding reform for supported housing. This submission details our core concerns and recommendations which we will also be raising in our response to the government's consultation into the future funding for supported housing.

To inform both our responses 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. Homeless Link has submitted an independent response to both consultations, which we fully support.

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

**CLINKS**

supporting voluntary organisations that  
work with offenders and their families

[www.clinks.org](http://www.clinks.org)



## **Clinks' 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**

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### **Our response**

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 in 2015/16 who needed supported accommodation.<sup>1</sup> 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.<sup>2</sup> Indeed, the evidence review published alongside the government's 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.

### **How would the local funding pot work?**

Although it is recognised by the Ministry of Justice (MoJ) and National Offender Management Service (NOMS) that securing stable and appropriate accommodation is essential for supporting rehabilitation, accommodation outcomes for many people in contact with the CJS are worsening. For example, the number of women leaving HMP and YOI Bronzefield with settled accommodation dropped from 95.5% in 2014 to 83.7% in 2015.<sup>3</sup> In HMP Wormwood Scrubs, the proportion of prisoners who had accommodation on release fell from 95% to 60% when the new probation providers were taking over the delivery of resettlement services.<sup>4</sup>

People with a conviction experience distinct barriers to accessing appropriate accommodation. This was demonstrated by a recent scoping exercise that Clinks and Homeless Link commissioned to understand how the accommodation needs of people in contact with the CJS are being met since the implementation of Transforming Rehabilitation (the government's programme for how people in contact with the CJS are managed in England and Wales). We were told of instances where some local authorities in England had defined people as being intentionally homeless and therefore not in priority need for housing by virtue of them committing a crime or breaching a court order.<sup>5</sup>

To mitigate against this, and to ensure that people in contact with the CJS are able to access stable and secure accommodation:

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

### **Recognising people in contact with the CJS as a vulnerable group**

We are supportive of the government's intention that the devolved funding will be ring-fenced for vulnerable groups. However, during consultation with our members they highlighted considerable concern that unless protections were introduced for people in the CJS or those with a history of offending, there is a risk that their housing needs would not be met. Under the new funding arrangements, there is a significant danger that other vulnerable groups' needs will be prioritised over people who have a conviction.

**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.**



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**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.**

### **Identifying need**

It is currently unclear how local authorities will determine the needs of the people in their population. 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.**

### **A joint accommodation strategy**

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 health and criminal justice agencies locally and nationally. This includes Community Rehabilitation Companies, the National Probation Service, 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 Transforming Rehabilitation.<sup>6</sup>

**Clinks reiterates our earlier recommendation that each local authority should develop a supported housing strategy.**

As it is important that this has national oversight and accountability:

**Clinks recommends that there is a national accommodation strategy, which should include shared outcomes measures, developed in partnership with the MoJ, DCLG and Department for Work and Pensions (DWP).**

### **Short term accommodation**

Clinks members highlighted that people leaving prison may need to access transitional or short term accommodation before accessing more long term provision. However, they were keen to add that short term accommodation should not be defined by length of time. This is an arbitrary measure and would not allow for sufficient flexibility, as taking steps to independent living is highly personalised. 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 supported people with a range of needs and therefore had a mixed-funding portfolio to support their



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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 before and after the publication of the Green Paper.

Clinks recommends that DCLG takes proactive steps to engage with providers that are not members of the task groups, and also works to engage with service users to determine their needs and views about how short term accommodation should be funded.

### **Should it be piloted before its full implementation?**

Clinks recognises there are concerns about the timeframe for implementation of the future funding for supported housing. We support 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 government reform programmes implemented with ambitious timescales, including the Transforming Rehabilitation programme.

To ensure 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. This should also include a view on how it affects the ability of people leaving prison to access supported accommodation.

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 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.

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

### **Will the new system ensure that the varied rate of the LHA cap will not adversely affect tenants and providers in low-value parts of the country?**

There are considerable regional differences in the levels of Local Housing Allowance (LHA). In higher value areas such as Richmond upon Thames, the LHA will generally cover both the rent and service charges. However, in lower value areas such as Kingston upon Hull, supported housing services would be solely reliant on the devolved top-up fund for their services.



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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. It is currently unclear what protections the government will put in place to ensure that these geographical differences are taken into account.

## Conclusion

This response gives our key concerns and recommendations about the future funding of supported housing. We will be submitting a separate response to the government's consultation and will continue to engage with the development of these reforms on behalf of our members.

## End notes

1. Sitra (2016) What is supported housing? Online: [www.sitra.org/about-us/what-is-supported-housing/](http://www.sitra.org/about-us/what-is-supported-housing/) (last accessed 22.09.2016)
2. Homeless Link (2015), Support for single homeless people in England: Annual Review 2015, p.18: [www.homeless.org.uk/sites/default/files/site-attachments/Full%20report%20-%20Single%20homelessness%20support%20in%20England%202015.pdf](http://www.homeless.org.uk/sites/default/files/site-attachments/Full%20report%20-%20Single%20homelessness%20support%20in%20England%202015.pdf) (last accessed 03.03.2017)
3. HM Inspector of Prisons (2016) HMP and YOI Bronzefield. Online: [www.justiceinspectorates.gov.uk/hmiprisons/inspections/hmp-yoi-bronzefield/](http://www.justiceinspectorates.gov.uk/hmiprisons/inspections/hmp-yoi-bronzefield/) (last accessed 20.04.2016)
4. HM Inspectorate of Prisons (2016) HMP Wormwood Scrubs, Online: [www.justiceinspectorates.gov.uk/hmiprisons/inspections/hmp-wormwood-scrubs-2/](http://www.justiceinspectorates.gov.uk/hmiprisons/inspections/hmp-wormwood-scrubs-2/) (last accessed 20.04.2016)
5. Clinks (2017) Are the accommodation needs for people in contact with the Criminal Justice System being met? Online: [www.clinks.org/briefings](http://www.clinks.org/briefings) (last accessed 03.02.2017)
6. *ibid*

# CLINKS

**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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