



Ministry of Housing,
Communities &
Local Government

Homelessness Reduction Act 2017

Government response to the Call for Evidence



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Ministerial Forward

Our country is known the world over for its fairness, decency and compassion for the most vulnerable. That is why it is right that tackling homelessness and ending rough sleeping are at the heart of this Government's moral mission – a personal priority for me and the Prime Minister.

We are making encouraging progress, with the latest figures showing a fall in the number of people sleeping rough for the second year in a row, with the areas supported by the Government's Rough Sleeping Initiative showing the steepest fall.

COVID-19 has presented a unique challenge, and the Government's first priority was to bring vulnerable people inside urgently, so they could self-isolate and stop the virus spreading. However, this crisis has also presented a unique opportunity to make serious inroads in tackling rough sleeping.

Thanks to Government funding and the hard work of local authorities, agencies and the homelessness sector across the country, nearly 15,000 vulnerable people have been housed in emergency accommodation, including hotels, since the start of the COVID-19 lockdown period.

Building on the considerable success so far, the COVID-19 Rough Sleeping Taskforce will lead the next phase of the Government's support for rough sleepers during this pandemic. The Taskforce has one overriding objective: to ensure that as many people as possible who have been brought in off the streets in this pandemic do not return to the streets.

More needs to be done to ensure we respond earlier and help more people before they reach crisis point to prevent them from becoming homeless in the first place. The landmark Homeless Reduction Act 2017 is central to this endeavour and, again, there are welcome signs this is making a real difference.

Since it came into force, over 240,000 households have had their homelessness successfully prevented or relieved through securing accommodation for more than 6 months.

We can see this positive impact reflected in our call for evidence on how the Act has been working and want to thank all the local authorities, charities, public bodies and interested individuals who took the time to respond.

Alongside the call for evidence, we also commissioned an independent evaluation which included in-depth case studies from a variety of councils and service users to help us understand how the Act is being implemented and whether it is working as intended for the benefit of all.

This has produced encouraging feedback, with reports of vulnerable people getting help earlier and for longer and of many people who would not previously have been helped getting the support they need.

The review has also provided invaluable feedback from those who have not had this experience, with the joint working required by the Duty to Refer proving challenging and the Act increasing pressure on councils in some local areas.

Working with the dedicated professionals on the front lines, we are determined to address these issues and meet our commitment to fully enforce the Homelessness Reduction Act.

That is why, as well as understanding how the Act is working, we are backing its implementation with funding – over half a billion pounds in 2020/21 to tackle homelessness and rough sleeping.

Of this, £63 million is going to local authorities through the Homelessness Reduction Grant, which gives a boost to the new burdens funding provided to implement the Homelessness Reduction Act.

The challenge we face on homelessness and rough sleeping is undeniably serious and urgent.

But as demonstrated by the Act and the bold measures we're taking – through the £266 million Next Steps Accommodation Programme and the £12 billion Affordable Homes Programme – so is the scale of our ambition.

Ending rough sleeping in this Parliament is one of the most ambitious targets set by any Government since the publication of the Beveridge report and the creation of the welfare state.

This is our collective moral mission – to give everyone a place to call home and a stake in our society.

RT HON ROBERT JENRICK

Introduction

1. The Government is committed to tackling homelessness and rough sleeping. It is taking unprecedented steps to prevent and reduce the number of people sleeping rough and ensure that everyone has a place to call home. Figures published in February show that the number of vulnerable people sleeping on our streets on a single night has now fallen by 9%¹ in the last year. The Government's key initiatives such as the Rapid Rehousing Pathway, the Rough Sleeping Initiative and Housing First are having an impact.
2. In response to the COVID-19 pandemic we have delivered key support to both those who are homeless and those who are at risk of homelessness. We have injected over £6.5 billion into the welfare system, which will help more households in temporary accommodation (TA) to find a settled home in the private rented sector that they can afford. This includes a rise in the Local Housing Allowance rate which will give nearly £1 billion additional support to support renters. This is in addition to the wider Government support package to protect jobs. The Coronavirus Job Retention Scheme covers 80% of the salaries of furloughed employees up to a total of £2,500 a month, as part of a cash injection of more than £30 billion for employers, with similar support for those who are self-employed.
3. The COVID-19 pandemic is a public health crisis and so required a health response. To enable this our priority was to urgently bring vulnerable people inside so they could self-isolate and stop the virus spreading. Thanks to the hard work of local authorities, agencies and the homelessness sector around the country, we urgently housed nearly 15,000 rough sleepers into emergency accommodation so they could self-isolate and stop the virus spreading².
4. In 2020/2021 the government is investing over half a billion pounds in tackling homelessness and rough sleeping. This will be used to address all forms of homelessness, including through the Flexible Homelessness Support Grant, the Homeless Reduction Grant and the Rough Sleeping Initiative.
5. Underpinning all this work is the Homelessness Reduction Act 2017, which came into force in April 2018. By putting prevention at the heart of homelessness service delivery, the Act provides a strong safety net for the most vulnerable in our society, it is a key lever in reducing homelessness and meeting the Government's commitment to end rough sleeping.

¹ Rough sleeping snapshot in England: autumn 2019, 27 February 2020, <https://www.gov.uk/government/publications/rough-sleeping-snapshot-in-england-autumn-2019/rough-sleeping-snapshot-in-england-autumn-2019>

² Coronavirus (COVID-19) emergency accommodation survey data: May 2020, 3 June 2020, <https://www.gov.uk/government/publications/coronavirus-covid-19-rough-sleeper-accommodation-survey-data-may-2020>

6. The ambition of the Homeless Reduction Act is to shift the culture of homelessness services towards prevention and provide assistance to all eligible people in need of it, removing barriers for service users. To that end, the Act has introduced new duties on local authorities (LAs) to intervene earlier and work to prevent and relieve individuals' homelessness, whether or not they are intentionally homeless or in priority need. This includes an enhanced prevention duty extending the period a household is threatened with homelessness from 28 days to 56 days, meaning that housing authorities are required to work with people to prevent homelessness at an earlier stage; and a new duty for those who are already homeless so that housing authorities will support households for 56 days to relieve their homelessness by helping them to secure accommodation.
7. The Homelessness Reduction Act also introduced the duty to refer. This has placed a new duty on other public agencies to refer people who they believe to be homeless or threatened with homelessness to local authority homelessness services. The duty to refer helps to ensure that services are working together effectively, ensuring that people's housing needs are considered when they come into contact with public authorities. It has also encouraged local housing authorities and other public authorities to build strong partnerships which enable them to work together to intervene earlier to prevent homelessness through increasingly integrated services.
8. The Government also introduced new data reporting requirements and systems for local authorities through the new H-CLIC reporting system, a case-level data collection system which replaced the older aggregated P1E data. The move to H-CLIC and case-specific information means more data will be available for central government, local authorities and partners to better understand the needs of homeless households, improve local and national policy-making and evaluate the effectiveness of interventions.
9. The Government wants to ensure that the Homelessness Reduction Act is working for all, and that local government and its partners have the tools and support to effectively implement and operate the Act. The Act introduced significant changes for local authorities and has had a substantial impact on the way they work and the services they provide. This has not been without its challenges and many local authorities are still working hard to embed this new approach within their service delivery. The Government committed to reviewing the implementation of the Act and how it is working in practice so that lessons can be learned, and improvements made.
10. The scope of this review was to understand how the Homelessness Reduction Act has been implemented and is being delivered in local areas so that the Government can identify issues that need to be addressed to make the Act work more effectively, and to identify best practice to enable local areas to learn from each other.
11. The review is comprised of two parts:

- i. An independent evaluation commissioned by the Ministry of Housing, Communities and Local Government (MHCLG) which has been conducted by the consultancy firm ICF and has been published alongside this report.
- ii. A call for evidence looking at the implementation of the Act.

12. The independent evaluation aimed to understand how the Act has been implemented in local areas, what has worked well and less well, and what outcomes are being achieved. It did not aim to quantitatively measure the impact of the Act on levels of homelessness. The evaluation methodology included:

- A survey of local authorities in England. 224 local authorities completed the survey.
- 18 qualitative local area case studies. Interviews and group discussions were conducted with 582 individuals (266 local authority staff, 184 service users, and 132 other public authorities and third sector organisations) across the case study areas.
- Analysis of homelessness statistics. Using H-CLIC data to assess who has received help and the reported outcomes of this in the first 12 months of the Act.

13. The call for evidence has been complemented by engagement with a wide range of stakeholders, MHCLG's Homelessness Advice and Support Team (HAST) and the Homelessness Reduction Act Working Group, whose membership is made up of local authorities and charities from across the country. The call for evidence looked to answer questions about:

- The impact the Act has had and the outcomes that are being achieved
- How the Act has changed the approach of local authorities and their partners to tackling homelessness and supporting those in need
- The experience of people approaching their local authority for help
- How the implementation of the Act has been resourced, including the level of new burdens funding to assist this
- Which elements of the Act and processes are working well, and which might need adjustment.

14. The evidence gathered to inform this review was collected prior to the COVID-19 pandemic. During the COVID-19 pandemic we have taken decisive action to support households who are homeless or at risk of homelessness and will continue to respond to emerging issues as they rise. We will consider any additional pressures created by COVID-19 as we develop the next steps to fully enforce the Act.

Overview

15. The Homelessness Reduction Act 2017 call for evidence was open between 23 July and 15 October 2019. We received responses from 160 different respondents. Response rates for each question varied.

16. The table below provides a breakdown of the responses by type of respondent:

Local authorities and local authority representatives	85
Charity	40
Personal view / anonymous response	18
Housing provider or representative of housing providers	9
Public body subject to duty to refer or representative organisation	6
Legal firm	2
Total	160

17. The call for evidence included 24 numbered questions with an additional 16 sub-questions. The vast majority of these were open questions in order to get as wide a range of responses as possible to fully understand the complexity and nuances of how the Act is working. A table can be found in Annex A containing all questions from the call for evidence and the number of responses to each question.

18. Throughout the review period, the Homelessness Reduction Act Working Group met to provide oversight of the delivery of the review and ensure regular challenge was brought to assessing the review's progress and emerging conclusions and recommendations.

19. This document provides a summary of the call for evidence responses, the findings of the independent evaluation conducted by ICF and the views of the Homelessness Reduction Act Working Group attendees. This document also sets out the changes the Government will make in response to points raised in the call for evidence responses and areas for further policy consideration.

Summary of findings from the independent evaluation

20. The findings of the independent evaluation reflect similar themes to those raised in MHCLG's Homelessness Reduction Act call for evidence and Homelessness Reduction Act Working Group. The evaluation found that the prevention duty was viewed as the element of the Act that has been most effective in achieving positive outcomes for more service users.
21. The relief duty was the element of the Act where reported effectiveness varied most between different local areas. The ability of local authorities to relieve homelessness was reported to be inconsistent depending on structural challenges such as the local supply of affordable housing.
22. The independent evaluation evidence indicates that personalised housing plans (PHPs) are being consistently delivered by local authorities, but perceptions on their impact are mixed. Concerns were voiced by several local authorities about the additional time it required to produce PHPs for little perceived benefit. Others saw added value in PHPs in providing clarity, consistency, establishing realistic expectations and a sense of reciprocity.
23. The evaluation found that local authorities were reporting a positive culture change, however there were mixed responses about how service users felt that they had been treated, with some feeling they were still being gatekept from services, suggesting the ethos of the Act is not yet universally embedded across all staff in every LA.
24. ICF found that joint working and the duty to refer worked best where pre-existing connections between local authorities and public bodies were already in place. Particularly effective methods for improving joint working include colocation and secondments.
25. The Government acknowledges the findings of the independent evaluation. The findings and recommendations have informed our own conclusions and areas for action, will continue to influence our ongoing monitoring of the Act.
26. ICF's full report can be found here:
<https://www.gov.uk/government/consultations/homelessness-reduction-act-2017-call-for-evidence>

Summary of responses

The impact the Act and the outcomes that are being achieved

27. The majority (52%, Q1A) of responses specifically reported that since the introduction of the Act, service has improved for people who would previously have received limited support to prevent or relieve their homelessness. Other responses were either neutral or unrelated to this aspect of the Act. The responses highlighted that single people and couples without children, as well as those deemed non-priority need, intentionally homeless or without a local connection are now entitled to more help.
28. There were also indications (28%, Q1A) that since the introduction of the Act people are receiving help both earlier and for longer. This was even more apparent for those who had received a Section 21 notice. This is due to the additional duties of the Act; a prevention duty of up to 56 days and a 56 day relief duty, in addition to the main housing duty. Responses highlighted that this has led to an increase in homelessness prevention outcomes and has encouraged a “culture of prevention” in many local authorities. However, responses also recognised in some cases applicants are attending their local authority too late to have their homelessness prevented. Many responses noted that the service delivered and the outcomes for individuals varied between local authorities.
29. Over half (57%, Q1D) of responses noted that in the period since the Homelessness Reduction Act was implemented temporary accommodation usage has increased. Many responses recognised that temporary accommodation plays an important role in ensuring that no one is without a roof over their head and since the introduction of the Homelessness Reduction Act more single people have been allocated TA. However, there were concerns that the Act has led to an increase in the overall numbers of households living in TA, the amount of time spent in TA, and the costs of TA for local authorities.
30. Some responses (14%, Q1C) noted that applicants are more likely to get an offer of settled accommodation due to private rented sector (PRS) access schemes. Since the Act was introduced, discharge of duties into the PRS has enabled 71,170 households, including single people without priority need, to move into settled accommodation. This reduces time spent in temporary accommodation and the costs of temporary accommodation to local authorities.
31. Other responses highlighted that some local authorities rely on discharging duties in the PRS and this raised questions over whether it is always the most appropriate solution due to the costs, uncertainty, suitability and quality of some properties in the PRS. If PRS accommodation is offered to a household with priority need the more stringent ‘suitability’ requirements for private sector offers apply. Where the applicant finds their own property with local authority help, and for households that do not have priority need, the PRS

suitability requirements do not apply but local authorities should still make reasonable efforts to make sure it is safe³.

32. Some (40%, Q10) areas reported that with the introduction of the Act, homelessness activity has received an increased level of scrutiny and involvement from elected members which was seen in a positive light and often linked to spending commitments.

How has the Act changed the approach of local authorities and their partners to tackling homelessness and supporting those in need?

Joint working

33. A key objective of the Act was to foster stronger working relationships between local authorities and their partners. Responses (28%, Q12) praised the Act for encouraging joint working between agencies which have a role in supporting people who are homeless or threatened with homelessness. Over half of respondents (51%, Q13) reported that there had been an improvement in working with internal partners, and even more reported improved working with external partners and public bodies (60%, Q13). Some (28%, Q13) felt that they already had good relationships with partners, while a small number of responses acknowledged that more work was needed to further develop relationships.
34. The majority (62%, Q11) of local authorities chose to provide homelessness services in response to the Act in favour to commissioning these from an external agency (38%, Q11). Services were more likely to be commissioned for specialist support i.e. mental health services or tenancy sustainment. Some local authorities have relied upon pre-existing contracts with partner agencies to assist in their response to the Act. External agencies reported an increase in demand and strain on their services as a result of the Act.
35. Local authorities have attempted to improve their partnership working with both statutory and, in some cases, non-statutory bodies through updating existing protocols and developing new protocols. Almost all (95%, Q4) respondents have done this to varying degrees, including data sharing arrangements, establishing local partnership forums and referral procedures around the duty to refer. Those that did not stated they already had suitable working protocols in place.
36. Despite these successes, many responses have highlighted that key challenges remain in encouraging more efficient joint working, particularly with the duty to refer.

³ The Homelessness (Suitability of Accommodation) (England) Order 2012, <http://www.legislation.gov.uk/ukxi/2012/2601/article/3/made>

Duty to Refer

37. The duty to refer has been met with a mixed response. Just under half (44%, Q6) of respondents felt that the duty has helped to prevent homelessness for service users, whilst 37% (Q6) felt that it had not had an impact. The duty has been met more successfully in areas using co-location within public bodies and those areas with historically strong relationships and channels of communication. Responses noted that some referrals made are incomplete (21%, Q6) and lacking crucial information such as contact details. Others, (16%, Q6) stated referrals come too late towards the end of the 56 day prevention period or in some (15%, Q6) cases not at all. The importance of the local housing authority following up a referral with public bodies was noted as an effective way of improving engagement, quality of referrals and setting expectations of both services under the duty to refer.
38. There was a perception among some local authority responses that public bodies are using the duty to refer to shift responsibility for clients onto housing options staff and do not continue to engage to help prevent or relieve the individual's homelessness. Some responses (44%, Q9) therefore called for a duty to cooperate to encourage further joint working to prevent and relieve a person's homelessness. Responses were unclear and differed on what a duty to cooperate would look like and how it would work in practice. A few number (23%, Q9) suggested that compulsory homelessness reduction boards would facilitate greater accountability between local authorities and public bodies, while others called for the duty to refer to come with greater accountability mechanisms for those not complying.
39. The duty to refer has encouraged the development of some cohort specific pathways including for care leavers (17%, Q4), prison leavers (25%, Q4) and those being discharged from hospitals (19%, Q4). However (17%, Q4) of respondents stated that cohort specific pathways were in place prior to the Homelessness Reduction Act.
40. There was moderate support from respondents to extend the duty to refer to encompass additional public bodies. These included General Practitioners (41%, Q5) and the police (38%, Q5). A significant number (45%, Q5) of responses also indicated that Registered Social Landlords should be subject to the duty
41. Responses reported that the key factors for successfully implementing the duty to refer are good communication between local authorities and partners (36%, Q8) and dedicated staff members (10%, Q8), while lack of willingness to share information or context between local authorities and public bodies was seen as a barrier to success (20%, Q8).

The experience of people approaching their local housing authority for help

42. The majority (53%, Q16) of responses indicated that the Act has enabled a more person-centred approach to the delivery of homelessness services. For applicants who are found non-priority, intentionally homeless or who did not have a local connection, access to meaningful support has increased since the introduction of the Act (52%, Q1A). Responses highlighted that fewer people are being sent away with no support or advice. It was reported that there is now much less of a noticeable difference in the service for single people compared to families at the prevention or relief stage.
43. The majority of the feedback received about the way applicants were treated by housing advice officers was positive. Applicants are given more time with housing officers to discuss their situation and options and create a PHP. Responses also praised housing advice officers who treated applicants with compassion, confidentiality and respect.
44. The administrative aspect of the Act was consistently raised throughout the call for evidence as a barrier to creating a positive experience for service users and achieving positive outcomes. The notifications and PHPs, which are compulsory products for housing officers to create and share with the applicant, represent an increase in administrative duties and workload for housing advice officers. Some report that for applicants, this can mean that the process can become more bureaucratic and less person centred and that they receive a large number of letters which contain large amounts of legal text and can be confusing. In some areas it has led to longer appointment times which is not suitable for all service users.
45. Some (27%, Q15B) responses did reflect that in practice the Act has led to minimal changes in overall experience for some service users. They highlighted that for applicants who would have been owed the main duty before the Homelessness Reduction Act came into force the outcome has rarely changed. Others noted that their focus prior to the Homelessness Reduction Act had already been on prevention and the Act had resulted in limited change. Some respondents highlighted that prior to the introduction of the Homelessness Reduction Act service had been poor and that the Act has meant a shift in their approach, creating a more noticeable, positive change for applicants.
46. Feedback on PHPs from local authorities has been mixed. PHPs help to guide the applicant through the process by making it clear what is being done, what they need to do and what will happen next. Since the introduction of the Act the process of addressing an applicant's homelessness has become more inclusive and collaborative, empowering the applicant to be proactive in solving their housing needs. Criticisms of PHPs included that they are too long and complex for applicants to understand or engage with, that they are sometimes just used as a "tick box exercise" and are not truly personalised and that sometimes they are not received. This can make it challenging to encourage positive engagement from some applicants.
47. Staffing has been viewed as both a barrier and enabler to positive outcomes for applicants. Responses highlighted that staff in local authorities play a vital role in reducing homelessness through implementing the Act. Many staff have embodied the spirit of the Act and have used the Act to help applicants to positive outcomes.

48. It is also clear that in some local authorities it has been challenging to recruit and train new staff, manage workload and encourage real culture change throughout the organisation. Some respondents reported that less time was now spent engaging with and helping clients and more was spent filling in HCLIC returns, PHPs and sending letters.
49. Most responses from local authorities reported that the shift from P1E data collection system to H-CLIC has been difficult. Local authorities have reported that the system is not user friendly for uploading data and it is difficult to access the data that they have uploaded. They do not feel that they have received the necessary support to interpret this data to a strategic end. Responses also questioned how far the system encouraged upstream prevention as prevention work which is done before the 56 day prevention duty begins cannot be recorded.

How has implementation of the Act been resourced and the level of new burdens funding to assist this

50. Responses highlighted that both the levels and security of funding for local authorities were key success factors in achieving a positive outcome for applicants.
51. Local authorities were clear that the new burdens funding which was awarded when the Act was introduced was useful, but that the costs of the Act have continued to be very high and the new burdens funding has not been seen as sufficient to cover implementation. 31% (Q24) of respondents reported they used alternative funding streams to help facilitate implementation of the Act. Further issues included the short-term nature of funding which 49% (Q21) reported as a concern.
52. In addition to funding, the Government provided support to local authorities through MHCLG's Homelessness Advice and Support Team (HAST). HAST are a team of advisors, drawn from local authorities and charities with expertise in the homelessness sector. The team provide advice, support and challenge to local authorities on delivery of their homelessness duties to families and single people. Feedback on HAST was very positive and some local authorities found their support key to implementing the Act.
53. Local authorities have also been supported with training through the National Homelessness Advice Service (NHAS). 77%, (Q23) of responses said that this training had been either very effective or effective with the advice line, training and webinars highlighted as particularly useful.

Equalities

54. 63% (Q24) of responses did not think that the Act has had a disproportionate impact on people with any particular protected characteristic in either a positive or negative way.

55. A number of responses recognised that the Act has had a positive impact on groups who may have been excluded from support prior to the introduction of the Act such as single people.
56. Some responses from local authorities recognised that the Act has enlightened them to areas where improvements were needed in their Homelessness Strategy in order to ensure that there was adequate support and pathways in place to support people with all protected characteristics.

Government Response

General

57. One of the key aims of the Act was to improve the offer for those who would previously have received little or no help. It is encouraging that responses indicate that this is now happening and that the cultural shift towards prevention and earlier help is beginning to embed. It is clear that there is more work to be done to make people aware of the Act and what it means for them. **That is why we will be updating the homelessness information on gov.uk and taking steps to raise awareness of the new duties. We will develop awareness-raising materials highlighting the prevention duty to people at risk of homelessness, for display in public spaces and waiting rooms.** We will work with other government departments, public bodies and local authorities to distribute these.
58. The introduction of the Act has led to homelessness duties becoming available for single people without priority need; over 365,000 single adults (almost two thirds of the total number of households), including 28,000 people with a history of rough sleeping and over 15,000 people who were rough sleeping at the time of the assessment, have been assessed as owed help to prevent or relieve their homelessness since the act was introduced⁴. Roughly three in five prevention duties ended due to securing accommodation for at least six months. While we want to see people in settled accommodation, the increase in temporary accommodation usage means that more people are being helped to get a roof over their head than prior to the Act.
59. We understand that some local authorities have had challenges with the levels of funding, funding certainty and meeting the requirements of the Act. The Government acknowledges that the increase in the use of temporary accommodation puts additional burdens on LAs. The expected reductions in temporary accommodation that the new burdens funding was based on have not been achieved in the anticipated timescales.
60. In response to the COVID-19 situation, we have increased the Local Housing Allowance rates for Universal Credit and Housing Benefit claimants so that they are set at the 30th percentile of market rents. This will mean that from April 2020 many people renting in the Private Rented Sector will have seen an increase in their housing support, gaining on average an additional £600 per year in increased housing support. We have also increased the national caps to ensure people in inner and central London where the caps apply will also see an increase in their housing support.
61. We recognise the importance of giving local authorities longer-term funding certainty which is why in December 2019 we allocated an additional £263 million through the Homelessness Reduction Grant (HRG) and the Flexible Homelessness Support Grant

⁴Statutory homelessness live tables 2020 Q1 (January to March), 20 August 2020, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/910420/StatHomeless_202003.xlsx

for 2020-21. The HRG combines and uplifts what was previously the Homelessness Reduction Act new burdens funding and Private Rented Sector Access fund. **To fully understand the impact of the new duties on LAs, we will undertake a post implementation review of the new burdens funding and will publish the results in the autumn.**

62. The Government will consider separately the points raised around affordable housing supply, welfare reform, access to the private rented sector and access to healthcare services. These challenges are beyond the remit of this review which focussed solely on the implementation of the Homelessness Reduction Act.

Joint working and the duty to refer

63. Joint working between local authorities and public bodies is imperative to tackling homelessness. It is clear that local authorities have made progress in developing and fostering relationships with their partners, but there is more work to do. Effective joint working at the local level is key to the success of the Act and we will continue to encourage this. The duty to refer is a significant aspect of the Act and plays a vital role in supporting households who are homeless or at risk of homelessness.

64. In the latest Troubled Families Financial Framework, we have included an indicator to encourage local authorities to identify families at risk of homelessness and support them through their local Troubled Families programme. In the chapter, *improving living standards: families experiencing or at risk of worklessness, homelessness or financial difficulties*, we have updated wording to highlight that families at risk of homelessness or living in accommodation which is not reasonable for them to continue to occupy are eligible for the programme. By including this indicator in the Financial Framework and highlighting this change in our communications with local authorities, we are able to more explicitly discuss the issue and explore how local authorities are currently supporting families at risk of homelessness.

65. Responses to the call for evidence suggested there have been challenges in successfully implementing the duty to refer. Since the duty to refer came into force in October 2018, the Government has continued to work with public bodies to ensure that they are making referrals and that they are prompt and of a good standard. To assist with this guidance on the duty to refer has been published online and we have directly supported public bodies subject to the duty to refer in updating their guidance and developing training. Since the introduction of the duty to refer we have published data on the number of referrals at both a local and a national level each quarter. The number of referrals refer which resulted in a homelessness assessment has increased each quarter with 7,690 referrals made between January and March 2020 compared to 5,110 in the first quarter of the duty, October to December 2018⁵. We continue to monitor public body referral

⁵Statutory homelessness live tables 2020 Q1 (January to March), 20 August 2020, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/910420/StatHomeless_202003.xlsx

levels and will take action to address any issues which emerge. **We will continue to promote the duty to refer at a national level to the relevant public bodies and monitor how it is being implemented via H-CLIC returns.**

66. The Ministry of Justice (MoJ) have refreshed their guidance for prison and probation staff in respect of the duty to refer which will be shared through operational communication channels. This guidance will be supported by a policy framework, which will mandate the actions prison and probation services must take to implement the duty to refer. MoJ have trained 110 staff through NHAS. For staff who were unable to attend this session, they have promoted NHAS webinars and workshops through operational news channels. They are also working with their analytical services to accurately record referrals and are running a workshop at a resettlement prison to ensure the process is working effectively and capture any outstanding issues.
67. The Department for Education (DfE) has undertaken awareness raising actions to promote the duty amongst Children's Services staff. This has included emailing all Directors of Children's Services, discussing delivering presentations on the duty at the National Leaving Care Benchmarking Forum meetings. The two DfE-funded advisers based in the Homelessness Advice and Support Team also raise awareness of the duty during their consultancy visits to LAs.
68. The Department for Work and Pensions (DWP) has added further data to the content of referrals from Jobcentre Plus, including amendments so that work coaches can provide information on household composition where it is necessary and proportionate to do so. Internal feedback is suggesting that the duty to refer has bedded in to jobcentres. DWP has ensured that jobcentres in England have a single point of contact for local homelessness services and to support work coaches where required. This referral forms part of the DWP's broader support offer for claimants who are experiencing or may be threatened with homelessness. That support includes help to make a Universal Credit claim and access the Jobcentre Plus employment offer. People with experience of homelessness have priority access to the Work and Health Programme so that they receive support at the earliest opportunity. At a local level, jobcentres work in partnership with local authorities and homeless organisations to sign-post homeless claimants to housing services.
69. The Department of Health and Social Care (DHSC) have focused on providing guidance for their public bodies. Tailored duty to refer guidance for NHS staff has been published on gov.uk. Health Education England have created and are providing a new training module for staff with practical steps to fulfil the Duty to Refer, which has been disseminated by NHS England.
70. Since the introduction of the Act, NHAS has offered a range of training courses to support local authorities, voluntary organisations, and public authorities with the 'duty to refer'. NHAS is a subsect of parent organisation Shelter. This training has been funded solely by MHCLG and features modules specifically focused on implementation of the Homelessness Reduction Act and associated duties.

71. Feedback on the duty to refer called for more public bodies to be added. One such body was GPs and primary healthcare services. We are aware that some GPs voluntarily refer patients who are homeless or at risk of homelessness. **We will work with DHSC to continue to encourage this and promote the sharing of best practice locally.** Any formal inclusion of GPs within the duty to refer would be subject to discussion and agreement with the British Medical Association as part of future GP contract negotiations.
72. Those who are homeless are encouraged to sign up to a GP service so they can get the treatment and medical advice that they need. Anyone living in England can register and consult with a GP without charge. The GP practice must accept a patient wishing to register, unless there are reasonable grounds to refuse the registration request. NHS guidance clearly outlines that a practice cannot refuse a patient because they do not have identification or proof of address. Without an address, a GP can accept them by using the GP practice's own address or the address of a hostel, where appropriate. [Standards](#) for GP practice receptionists on homelessness have been developed by CQC, Pathway and the Faculty for Homeless and Inclusion Health. Training is available for receptionists and guidance for GPs to help them deliver essential frontline care to the homeless.
73. There were also suggestions of adding social landlords to the duty to refer. As social landlords are not public bodies, the duty cannot apply to them. **We will, however, continue to encourage voluntary referrals from social landlords by working with the National Housing Federation to promote the voluntary Commitment to Refer for social landlords.**
74. A number of responses called for the introduction of a duty to cooperate. There was no consensus amongst respondents about what a duty to cooperate would mean in practice. We recognise and share the ambition behind the call for improved joint working between local authorities and public bodies. **We will continue to work with local authorities, public bodies and other government departments to explore how we can continue to improve joint working, including considering the scope for extending the duty to refer to other agencies and partners based on what is already being done as best practice.**

Administration

75. It was clear from feedback that the administration of the Act, specifically the necessary notifications was a challenge for housing advice officers. Some local authorities reduced the burden by combining letters. Feedback on PHPs was mixed, some service users were provided with much more helpful PHPs than others. We understand from the feedback we received that some letters are confusing for service users. **We will be exploring options for sharing additional guidance on PHPs to ensure a consistent, high quality service for homeless households across the country. We will explore the sharing of best practice to help local authorities ensure that the language used, length of notifications, and PHPs are both understandable and engaging for service users.**

76. The Homelessness Code of Guidance is reviewed regularly, and we have made a number of updates since its publication. **In response to the feedback received in this review we will update the Code of Guidance to make it clear that notifications and PHPs should be combined where appropriate to ensure that they are as clear as possible for service users. The Code of Guidance will also make clear that written notifications should be communicated to service users in the most appropriate way for their needs.**
77. Feedback and recommendations from the independent evaluation by ICF, the Homelessness Reduction Act Working Group and the call for evidence made it clear that a small number of local authorities have experienced challenges in reporting data via H-CLIC rather than in P1E and that additional guidance and resources for local authorities to analyse the H-CLIC data would allow the benefits of the system to be realised. The quality of the data which is being captured on H-CLIC is improving, all local authorities in England have now submitted data on H-CLIC and we are working with software suppliers and local authorities to ensure that the data submitted is of high quality. In order to make the H-CLIC statistics clearer and as useful as possible **we have added population figures to the main tables, streamlined the front pages of the tables to include drop down options and allow the information to be easily read, and started publishing separate timeseries tables to allow easy comparison. We also plan to add financial year summaries to the suite of tables published with the last quarter of each financial year.** We encourage local authorities to continue to work closely with their H-CLIC providers on training and improving the systems they have to meet their needs. MHLCG will continue to offer advice and guidance to authorities when requested.

Staffing

78. We recognise that in some local authorities there have been challenges with staffing the Act appropriately. A skilled frontline workforce, capable of supporting an individual with their bespoke needs, is essential to effectively implementing the Act. This is why the Government has been committed to providing support for frontline staff working with those who are homeless.
79. In 2019/20 we provided £2 million in grant funding to the NHAS to build capacity and capability in the sector. They have delivered training and events on the Homelessness Reduction Act to both frontline staff in local authorities and public authorities with a duty to refer, to date they have delivered 658 training sessions to 7,098 delegates. They have also provided expert homelessness advice through a dedicated phone line and webchat facility and developed a range of information and support resources and tools to support front line workers. 77% (Q23) of responses said that this NHAS support had been either very effective or effective.
80. **In 2020/21 we are continuing to fund activities that professionalise the homelessness workforce.** NHAS are working in partnership with their parent-organisation Shelter to launch a Learning Pathway programme. The Learning Pathway

offers a programme of core homelessness, housing, and social welfare courses that are key to the role of an adviser or officer working directly with people who face homelessness or housing issues. The Learning Pathways will use a sophisticated online booking system in order to tailor training to the experience and needs of the delegate or organisation. Shelter/NHAS plan to market and monitor the delivery of the new learning pathways from July 2020 so that the model can be further refined in light of delegate uptake and feedback. Initial delivery of the programme will be based on a series of e-learning and webinar sessions, with a view to including face-to-face sessions in the future once PHE guidance allows.

Conclusion

81. The Homelessness Reduction Act is the most ambitious piece of homelessness legislation for decades, significantly strengthening England's homelessness safety net at a national and local level. It has been ground-breaking in shifting the way in which local authorities tackle homelessness, putting prevention at the heart and ensuring more people get help earlier. Wide ranging reforms such as these were always going to present challenges and take time to bed in, but we are encouraged by the positive changes the introduction of the Act is bringing.
82. For the most part, local authorities have risen to this challenge and the Act has already led to more support for single people; over 365,000 single adults (almost two thirds of the total number of households), including 28,000 people with a history of rough sleeping and over 15,000 people who were rough sleeping at the time of the assessment, have been assessed as owed help to prevent or relieve their homelessness since the act was introduced.⁶. But if the Act is to fully embed there is more to be done both by central and local Government.
83. The input of those who contributed to the call for evidence, the Homelessness Reduction Act Working Group, and the independent evaluation conducted by ICF, has formed the basis for this response and identified priorities for action. The Government is committed to taking forward these actions and continuing to support local authorities to implement their new duties under the Act in order that the full potential of the Homelessness Reduction Act to be realised.

⁶ Statutory homelessness live tables 2020 Q1 (January to March), 20 August 2020, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/910420/StatHomeless_202003.xlsx

Annex A: Full list of question in the call for evidence and number of responses

Q number	Question	Number of responses
1A	What has improved in service and outcomes for families and individuals who are homeless or at risk of homelessness?	120
1B	What has not improved/ got worse?	119
1C	What are the enablers or barriers to achieving positive outcomes?	121
1D	What impact has the Act had on the use of temporary accommodation for your local housing authority?	107
2A	Please identify any elements of the Act that you believe work or do not work well in assisting you and any partner agencies (both statutory and non-statutory) to prevent and relieve homelessness.	112
2B	Please provide any suggestions of areas of the Act that you feel should be amended, being as specific as possible as to what alteration you would recommend.	102
2C	Has your local housing authority amended its allocations scheme to reflect the duties in the Act, and if so what changes have been made?	93
2D	If you have amended the policy, how has this affected lettings to homeless households?	70
2E	How could the data generated from H-CLIC help you to inform policy/ resources?	88
2F	What more could be done to assist you in submitting and making use of the data for your area?	83
2G	Please add any further comments on the Act or the context in which it has been implemented that you think will be useful.	81
3	Has your area developed or updated protocols and/ or referrals arrangements with statutory and non-statutory agencies in relation to the duty to refer?	82
4	Have pathways been developed or reviewed and updated to help specific cohorts of people? Please describe what these are.	81
5	In relation to the public authorities subject to the duty to refer, please name any you would add (and why) and /or remove (and why).	102
6	For public authorities with the duty to refer, has the new duty helped to prevent homelessness for your service users? If no, please say what the barriers have been to making the duty effective.	75
7	Has the duty to refer led to an improvement in outcomes for any particular groups, and if so which?	81

8	Have there been any public authorities which have been successful in implementing the duty to refer - what have been the defining success criteria?	61
9	What, if any, further legislative or government-led changes would improve partnership working to prevent and relieve homelessness?	95
10	Has the Act led to more scrutiny and involvement from elected members? If so, what has the impact of this been?	75
11	Has your local housing authority commissioned any external agencies to deliver part or all of the homelessness services in response to the Act? If so, please indicate any benefits in terms of outcomes for customers?	76
12	In what ways has the Act influenced the strategic direction of your local housing authority? If so, has it been effective?	87
13	For local housing authorities, has the Act led to an increase in quality of partnerships working with internal (within the authority) or external partners?	88
14	For (non-local housing authority) partner agencies, has the HRA led to an increase in your contribution to preventing and relieving homelessness?	31
15A	From the perspective of a homeless applicant in your area or from your experience. What has changed most for: Single people / households without children?	109
15B	From the perspective of a homeless applicant in your area or from your experience. What has changed most for: Families?	93
16	Do you feel that the Act has enabled a more person-centred approach to the delivery of homelessness services?	117
17	Has the Act resulted in earlier intervention and support to prevent or relieve homelessness where an applicant has been served with a valid S21 notice?	105
18A	For local housing authority respondents , please identify what <u>additional</u> costs you have incurred in implementing the HRA, broken down by financial year, for staffing.	71
18B	For local housing authority respondents , please identify what <u>additional</u> costs you have incurred in implementing the HRA, broken down by financial year, for IT.	68
18C	For local housing authority respondents , please identify what <u>additional</u> costs you have incurred in implementing the HRA, broken down by financial year, for temporary accommodation.	63
18D	For local housing authority respondents , please identify what <u>additional</u> costs you have incurred in implementing the HRA, broken down by financial year, for accessing the private rented sector (e.g. incentives paid to landlords)	66
18E	For local housing authority respondents , please identify what <u>additional</u> costs you have incurred in implementing the HRA, broken down by financial year, for legal.	56
18F	For local housing authority respondents , please identify what <u>additional</u> costs you have incurred in implementing the HRA, broken down by financial year, for training.	62
18G	For local housing authority respondents , please identify what <u>additional</u> costs you have incurred in implementing the HRA, broken down by financial year, for other.	38
19	Would you be willing to provide more information on cost data if required?	69

20	<u>For non-local housing authority respondents</u> , please comment on whether you consider sufficient resources have been deployed for implementation of the Act in your area	23
21	Beyond funding for the Act, are there resource or funding stream considerations which impact (positively or negatively) on the ability to prevent and relieve homelessness, and if so, please describe these	77
22	Which of NHAS services have you or your team used since April 2017 (ability to tick multiple): a. Training b. Roadshows c. Advice Line d. Online information/resources (e.g. toolkits, webinars, factsheets or legal updates) e. None	76
23	How effective have you found the services delivered by NHAS in supporting you or your team to carry out the new duties brought in by the Act?	80
24	Do you think that the Act has had a disproportionate impact, either positive or negative, on any individuals, in particular those with 'relevant protected characteristics' (i.e. age, disability, gender reassignment, marriage and civil partnership, pregnancy, maternity, paternity, race, religion or belief, sex, sexual orientation)? Please provide evidence to support your response.	91