



**LOCAL  
PARTNERSHIPS**

# **LOCAL AUTHORITY BRIEFING: HOUSING PEOPLE WHO WERE ROUGH SLEEPING AND THOSE AT RISK WHO HAVE BEEN ACCOMMODATED DUE TO COVID-19**

---

Supported by



# CONTENTS

<b>1</b>	<b>INTRODUCTION .....</b>	<b>3</b>
1.1	Context .....	3
1.2	The challenge .....	4
1.3	This briefing .....	4
<b>2</b>	<b>SOURCING ACCOMMODATION .....</b>	<b>6</b>
2.1	Introduction .....	6
2.2	Needs assessment and planning .....	6
2.3	Local authorities.....	8
2.4	Registered providers and charities.....	10
2.5	Private rented sector.....	17
2.6	Other.....	20
<b>3</b>	<b>SOURCING SUPPORT.....</b>	<b>23</b>
3.1	Introduction .....	23
3.2	Housing first.....	23
3.3	Support providers in the voluntary and charitable sectors .....	23
3.4	Adult social care .....	24
3.5	Health services .....	25
3.6	Criminal justice .....	25
3.7	Other partners.....	26
<b>4</b>	<b>FUNDING AND PROCUREMENT .....</b>	<b>28</b>
4.1	Introduction .....	28
4.2	Funding.....	28
4.3	Procurement and modifying existing contractual arrangements .....	30
<b>5</b>	<b>FURTHER HELP.....</b>	<b>33</b>
5.1	Introduction .....	33
5.2	Guidance and good practice .....	33

# 1 INTRODUCTION

## 1.1 Context

At the end of March the government wrote a letter to the leader of every local authority in England asking them to accommodate all people sleeping rough or at risk of sleeping rough and to find alternative accommodation for those in “shelters” where they could not easily self-isolate by the end of the weekend, in order to prevent the spread of COVID-19. Based on MHCLG figures, local authorities have since moved an estimated 90% of rough sleepers known at the start of the lockdown into hotels, bed and breakfasts and other temporary accommodation, and accommodated up to 15,000 individuals.

Local authorities now have the task of sourcing alternative accommodation for this group of people rather than allowing them to return to the streets when lockdown ends. This task is complex, as the majority of rough sleepers need support, at least temporarily, as well as housing, but many do not fall within the definition of those for whom local authorities have a statutory homelessness responsibility to secure accommodation.

Dame Louise Casey, a government adviser on homelessness who reports directly to the prime minister, has been appointed to lead a taskforce to advise the sector on plans to support rough sleepers into long-term, safe accommodation. The £381 million announced for rough sleeping services at Budget has been extended to £433 million with £160m available in 2020/21. The funding is intended to ensure that 6,000 new housing units will be put into the system, with 3,300 of these becoming available in the next 12 months<sup>1</sup> and includes revenue funding to provide support for residents of those homes.

In many cases there may be a need for interim move on accommodation, once initial emergency accommodation is no longer available and before more settled housing and support can be sourced.

All of the best practice we have accessed while preparing this briefing has stressed the critical importance of councils understanding in detail the needs of the people currently accommodated, beginning with their health so as to protect them from COVID-19, and including their support needs and immigration status, so that the right solution can be sourced to give each individual the best chance possible of moving to a stable long-term home. A range of provision, often in collaboration with partners and agencies, will be needed to match individual needs.

On 28 May the Minister for Rough Sleeping and Housing sent a letter to all council Chief Executives about moving to the next phase of accommodating rough sleepers. He thanks councils for the vital work they have done so far in helping protect this vulnerable group and asks that councils continue to offer help and support. He stresses that next steps should be worked up with health partners to have a health-led approach. MHCLG Rough Sleeping and Homelessness advisors will work with councils to help them prepare initial move-on plans for all individuals by 11 June.

---

<sup>1</sup> <https://www.gov.uk/government/news/6-000-new-supported-homes-as-part-of-landmark-commitment-to-end-rough-sleeping>



## 1.2 The challenge

Councils across the country have responded in an unprecedented way to the call to bring “Everybody In”. MHCLG data suggests that 90% of known rough sleepers have been accommodated and a great many more people who were not rough sleeping but were living in night shelter or similar accommodation where social distancing is difficult or impossible have been placed in more suitable accommodation.

Local authorities all over the country want to work with government and a range of local partners to seize the opportunity to end rough sleeping and ensure that those accommodated do not need to return to the streets. But their ability to do so is constrained by a number of factors. £3.2 billion has been made available to councils to support their COVID-19 response, but there are many calls on this funding, not least in meeting local social care responsibilities. In addition, many councils have seen their revenue income from business rates fall very significantly.

In this context, continuing to pay for hotel accommodation for rough sleepers, and those at risk of it, and to provide funds to accommodate people with no recourse to public funds (NRPF) beyond the current emergency is extremely challenging for many councils, especially those with large numbers of rough sleepers.

## 1.3 This briefing

We know that councils are working hard to respond to this challenge. This briefing is designed to help you understand the options available for sourcing accommodation and support solutions for this client group in the immediate circumstances of June 2020. It covers sourcing accommodation and support, both interim and longer term, and considers how this may be funded within current resources.

You may already be doing some or all of what we describe in this briefing. We have attempted to quickly assemble ideas and best practice and to signpost you to where you can find further information and help.

This briefing will be updated as things change, which we know they will, as the situation is fast moving.

Councils wishing to access further help can contact the [LGA's principal advisors for each region](#).

Councils may also wish to refer to the LGA's [web based resources on housing and homelessness](#).

The LGA has developed an online [COVID-19 resource hub](#) providing information on the broad range of issues to support council's local responses to the COVID-19 emergency.

The authors of this briefing are **Jenny Coombs** and **Tim Gray**.

**Jenny Coombs** leads Local Partnerships' health and social care programme. She is a qualified town planner and housing professional and previously worked in the registered provider sector and for a London Borough before joining Local Partnerships in 2010. Local Partnerships is jointly owned by the Local Government Association, Welsh Government and HM Treasury. They work only for the public sector and form part of the government family.



**Tim Gray** is an associate of Local Partnerships and also leads an independent consultancy specialising in homelessness, multi-agency collaboration, temporary accommodation, and outcomes-based commissioning. Tim has previously worked for central government, local government, housing associations and the voluntary sector, and has led on the development of a number of programmes and policies of national significance.





## 2 SOURCING ACCOMMODATION

### 2.1 Introduction

This section covers options for sourcing accommodation both from within councils' own stock and with partners. It covers:

- Local authorities
- Registered Providers and charities
- Private rented sector
- Other sources

All of these opportunities will require associated support to a lesser or greater degree. This includes assisting individuals to view, accept and take up a tenancy and, in many circumstances, a level of ongoing support, whether short or longer term. Sourcing support is covered in section 3.

Useful guidance on accommodation and support planning post-COVID-19 from Homeless Link can be accessed below:

[homeless.org.uk/sites/default/files/COVID-19%20Transition%20Planning%20local%20homelessness%20provision%20and%20move%20on%20%20.pdf](https://homeless.org.uk/sites/default/files/COVID-19%20Transition%20Planning%20local%20homelessness%20provision%20and%20move%20on%20%20.pdf)

### 2.2 Needs assessment and planning

It is extremely important that there is a comprehensive assessment of the needs and issues of those accommodated in hotels in order to inform which types of accommodation will be most appropriate for them.

The assessment should include at least the following:

- Vulnerability to COVID-19, due to ill-health and/or health conditions, age or other risk factors
- Access to public funds i.e. which clients are subject to NRPF conditions, or are without specific status but not able to access benefits or homelessness assistance, such as those whose immigration status is unclear and many European nationals. What may be able to be done to help some of these clients gain access to benefits. This may be through work on immigration status based on current circumstances or through assistance to gain employment
- Status under the homelessness legislation. Where clients are in Priority Need, councils are likely to be under a duty to provide interim accommodation
- Support needs and risk assessment. What level of support does the client need to be able to move successfully into and sustain a stable home? Are they ready to engage with detoxification and rehabilitation for drug and/or alcohol dependency? Is this high support provision, such as Housing First or residential care? Do they need supported accommodation or floating support for a limited time period? Can they be successfully accommodated in private rented accommodation or general needs social housing with limited support after taking up the tenancy?
- Health care (including drug and alcohol dependency), care and support needs. Many people in emergency accommodation have engaged with their own health and wellbeing, and services, for the first time; health gains have been made. Enabling continuity of care should be considered as part of move-on planning

- 
- Current employment and benefit status, including if the individual is subject to the Overall Benefit Cap (OBC)
  - Disability, especially where limited mobility means they need accessible accommodation

Some people will also benefit from assessments of care and support needs under the Care Act. LGA and ADASS have published the below briefing:

[local.gov.uk/adult-safeguarding-and-homelessness-briefing-positive-practice](https://www.local.gov.uk/adult-safeguarding-and-homelessness-briefing-positive-practice)

A number of councils have developed systems grouping clients according to vulnerability to infection, support needs, immigration status and other factors to help assess the type of accommodation solutions which will be most appropriate. This type of assessment will greatly facilitate joint working with partners such as housing associations, who may be able to help provide accommodation. It should be carried out by officers with appropriate skills, whether employed by the council, voluntary sector partners, the NHS or using a combination of skills as needed.

Important guidance on triage, assessment and care for homeless people during COVID-19 is available [here](#), which sets out clinical advice and guidance on delivering a health-led, multi-agency approach to reducing the risk of infection and severe illness among the homeless population as a result of COVID-19.

Councils will need to take account of this guidance in their procurement and allocations of accommodation, and will need to account for continued transmission risk, which would suggest maintaining at least some self-contained provision for the more vulnerable COVID-CARE and COVID-PROTECT groups, working in partnership with local public health and NHS leads.

Councils' decisions will also need to account for the possibility of a second spike or a local outbreak amongst those accommodated in hostels or supported housing.

### **Case Study 1** **Coventry City Council**

Coventry City Council fund The Coventry Refugee and Migrant Centre (CRMC) in the city to provide advice and information. A meeting took place where council commissioners explained that their corporate priority is to assess all 44 NRPF accommodated in the city in order to ascertain their status and following this their accommodation options. CRMC agreed to prioritise this piece of work and meetings were booked for all of the individuals with lawyers employed by the centre. Therefore, there was no additional cost to the council.



More detailed information and advice on how to assess the needs of clients accommodated in hotels and other emergency accommodation has been produced by Crisis:

- <https://crisis.org.uk/ending-homelessness/resources-for-practitioners/COVID-19-transition-planning/>

- 
- <https://crisis.org.uk/ending-homelessness/resources-for-practitioners/housing-centre-guides/local-needs-assessment/>

## 2.3 Local authorities

### 2.3.1 Background

Of the 317 councils in England with a housing responsibility, roughly half retain their own stock. In addition many councils have established housing companies in recent years to develop or acquire new housing both in and outside of the Housing Revenue Account (HRA).

Councils also own land and assets, some of which may be suitable for repurposing for accommodation for this client group or for development for new accommodation.

### 2.3.2 Opportunities

#### **Existing stock – settled accommodation**

- Suitable voids in existing HRA stock. It may be necessary to review allocations policies in order to use voids for this client group – see Newcastle’s case study below
- Suitable voids in any housing company owned stock outside of HRA
- Surplus assets such as vacant sheltered housing, care homes or offices that could be repurposed to provide self-contained move-on accommodation
- Accommodation above council-owned retail units may be suitable for conversion to self-contained move-on accommodation



## Case Study 2

### Newcastle City Council allocations during the COVID-19 pandemic

Newcastle's aim was to avoid the use of hotels with the associated costs and problems of non-specialist accommodation providers by strengthening our housing pathways to maximise the value of our existing investment in homeless accommodation.

The Council's existing Allocation and Lettings policy permits the Council to offer direct lets to those in priority need and to suspend the normal way of advertising properties for bidding through the choice-based lettings system. In addition, the Newcastle Housing and Emergencies Concept of Operations allows the Council to suspend policies and procedures where required to respond to an emergency situation, such as the COVID-19 pandemic. The decision to suspend the Lettings and Allocations policy was implemented on the 26th of March for an initial three-week period reflective of the government's lockdown period. It was subsequently extended for a further three-week period.

The Council established an Emergency Housing Panel. It already had in place panels for extra care housing, supported housing for people with learning disabilities and supported housing for people with mental health needs. The panels are multi-disciplinary which has been proven to embed a solutions focused approach centred around customer need. Extending the panel approach was agreed as the most effective solution to keep meeting emergency housing need.

The purpose of the panel is to identify appropriate options for people in emergency housing need. It also facilitates the release of vital bed spaces in hospitals, crisis accommodation for homeless people and temporary care placements. The panel is chaired by key officers from the strategic housing service and includes representatives from the ALMO, Your Homes Newcastle, the Homelessness Service and Children and Adult's Social Care.

To date (27th May) the panel have received a total of 194 referrals, this has resulted in 14 hospital discharges to free up urgently needed bed spaces, and moved 70 individuals on from temporary homeless accommodation. The majority of homeless cases dealt with have prevented individuals going into crisis accommodation.

The Council is planning to retain the advantages of the panel and particularly the sense of urgency needed to have rapid rehousing from homeless accommodation and to bridge the gap between supported and general needs housing by strengthening the pathway and in doing so identify the size and nature of the gap to be bridged.



#### Existing stock – interim accommodation

- Some councils use their own stock as temporary accommodation and there may be opportunity to increase this in the short term
- Surplus assets such as above that could be repurposed to provide self-contained interim accommodation
- Councils may also wish to accommodate people in existing leased, nightly paid or other forms of temporary accommodation, although this may be expensive in some areas

### **New stock – settled accommodation**

- Surplus land that could be used for the development of new, permanent supported or move-on housing
- The majority of councils are involved in One Public Estate (OPE) partnerships with other public sector partners in their area. These partnerships are an important way of identifying surplus public estate or opportunities to reconfigure the public estate. OPE partnerships may be able to identify land in the ownership of other public bodies that could be used for development for this purpose. Details of OPE partnerships and contacts can be found at: [local.gov.uk/topics/housing-planning-and-homelessness/one-public-estate](https://local.gov.uk/topics/housing-planning-and-homelessness/one-public-estate)

### **New stock – interim accommodation**

- Land that could be used on a “meanwhile” basis for the construction of temporary housing, potentially demountable and moved to a different location

#### **Case Study 3**

#### **Birmingham City Council**

Birmingham City Council accommodated 143 people as part of the Everybody In COVID-19 response. This included 88 No Recourse to Public Funds (NRPF) cases, which is higher than expected, as NRPF constituted only 10% of the most recent rough sleeper count in Birmingham. This reveals a hidden problem with NRPF homelessness which has come to light in a number of areas of the country.

The council has accommodated people in a range of accommodation types, including a commercial hotel, commissioned supported accommodation, temporary accommodation, and with some of the non-commissioned supported housing providers with whom the council has a positive relationship.

A night shelter was closed, and the staff redeployed to provide support for those moved into hotel accommodation, which has been crucial to the success of those placements.

The aim of the council is to ensure that everyone who is eligible has suitable offer of accommodation by the second week of June and officers are confident this can be achieved.

The outstanding issue causing most difficulties are the high number of NRPF clients whom the council has accommodated at its own expense under the COVID-19 emergency. Immigration assessments have been made for all NRPF clients, but these cases are often difficult to resolve in the short term.

## **2.4 Registered providers and charities**

### **2.4.1 Background**

Registered Providers are important partners for local authorities in providing sustainable accommodation solutions for those relocated as a result of



COVID-19. There are also a wide range of other charitable organisations working with people experiencing homelessness, that play an important role in either providing accommodation and supporting people to sustain their tenancies.

The National Housing Federation made clear in its [response](#) to the HCLG Committee Inquiry on COVID-19 that “Housing associations have a key role to play in preventing and ending homelessness and have been heavily involved in the effort to alleviate homelessness during the COVID-19 crisis. They are also in a strong position to assist with the next steps following the crisis”.

There is a real will among housing associations and homelessness charities to work with councils to accommodate former rough sleepers and residents of insecure temporary accommodation, and housing associations as partners may have the ability to help in a variety of ways.

The National Housing Federation has produced a briefing for housing associations, which encourages them to work closely with local authorities to help provide move on for homeless people placed in emergency accommodation due to COVID-19.

<https://www.housing.org.uk/globalassets/files/resource-files/housing-providers-and-local-authorities-tackling-move-on-together-during-coronavirus.pdf>

If you do not have strong links with local charities working with people experiencing homelessness you may find it helpful to make contact with the Partnerships Team at Homeless Link. Homeless Link has Partnership Managers who work with homelessness charities in their areas and can help link agencies up and promote collaboration. If you are interested please contact: [Anna.Suswillo@homelesslink.org.uk](mailto:Anna.Suswillo@homelesslink.org.uk)

## 2.4.2 Opportunities

### General Approach

Housing Associations and homelessness charities are keen to work closely in partnership with councils to understand and find ways to meet local needs, and it is likely to be worth bringing the most prominent members of the sector together locally to discuss the contribution which they can make collectively. This can be done by building on existing local groups or fora and, if necessary, seeking support from housing associations where councils have more established relationships in order to bring others on board. There may be a local multi-agency Homelessness COVID-19 Taskforce meeting to oversee initial placements into hotels, and this group could provide an opportunity to progress joint discussions about move on and more settled options, as well as assessment planning. Some new partners may need to be invited to these groups.

In some areas where a number of RPs work across local authority boundaries, there will be advantages in local authorities coming together as a group in order to discuss provision with the main RPs.



## Case Study 4

### Plymouth Alliance

Plymouth City Council (PCC) has had an Alliance contract in place since April 2019 ( 25 separate contracts delivered by seven different organisations collectively known as The Plymouth Alliance) to deliver and effect change across the complex needs system in the delivery of statutory and non-statutory temporary supported housing, homelessness support and drug and alcohol support.

Pre-COVID-19, the Plymouth Alliance had a range of short-term emergency dormitory style provision for rough sleepers (22 bed spaces across two services). In response to the crisis, a 12 bed and a 15 bed house were initially leased for three months (H4H). Night staff from one of the original services, in addition to multi-disciplinary staff from across the Alliance provide 24 hour support at the H4H houses. The day centre kitchen (which closed during the pandemic) is being used to provide (via delivery) one hot meal per day to residents.

Alongside this, a multi-agency response process has been put in place with the Rough Sleeper Outreach Team (RSOT), local authority housing service (Community Connections) and the Access to Accommodation Hub (A2A) to have oversight of how accommodation across the entire system is utilised. Newly evidenced rough sleepers are given a same day appointment.

The Plymouth Alliance has made a commitment to maintain the H4H properties so that there is no longer any dormitory style accommodation and rough sleepers remain off the streets. An additional 48 bed spaces in leased HMO properties have also been taken on.

The Plymouth Alliance are developing their reset strategy for their service model post COVID-19 and there is no intention to return to the previous model of delivery. Part of the reset strategy includes amongst other things: taking on additional staff to work across the temporary accommodation portfolio to support move on wherever possible; bringing on additional HMO properties, for initial temporary accommodation with potential to become permanent accommodation; revisiting day and treatment services delivery to develop new best practice to meet the needs across the wider system.



### Existing stock

It will often be possible to let general needs or supported housing stock already owned by RPs to former rough sleepers leaving hotels. This will depend on the operation of local allocations policies and of RPs lettings policies for vacancies falling both within and outside existing nominations agreements.

A number of housing associations are currently carrying voids, as a result of a suspension of lettings during the COVID-19 lock down. This presents a real opportunity for move on from hotels, but this situation is unlikely to continue for long.

Local authorities should carefully consider their priorities in nominating to these vacancies in order to ensure that the opportunity to house homeless people accommodated in hotels is not lost. This may involve a temporary change to allocations policies and/or



an increased use of direct offers of accommodation, where this is permitted within local allocations policy rules.

In order to maximise the number of lettings available to rough sleepers and those at risk of rough sleeping, it will be sensible for housing associations and local authorities to discuss each applicant's needs on a case by case basis, including any support needed and any issues around arrears or affordability. The appropriateness of housing offers (broadly general needs or supported housing) should be decided based on need. Where more support than usual is needed, funding for this will need to be considered. Applicants with complex needs may benefit from a Housing First or specialist supported housing offer.

New government [guidance to social landlords](#) on lettings was published on 13<sup>th</sup> May 2020. This emphasises the need for lettings activities to comply with government advice on [social distancing in the workplace](#), including:

- property inspections for vacating tenants
- collecting returned keys
- conducting viewings
- conducting tenancy sign-ups
- preparing homes to be re-let

Whilst allocations of accommodation by local authorities remain governed by the Housing Act 1996, and associated guidance, it may be worth considering making direct offers of accommodation to those moving out of hotels, rather than following normal bidding processes, where this will increase the speed of moves. In such cases, it is good practice to discuss with the RP concerned any considerations about a particular property (support, location, safety, accessibility) which would affect which potential tenant would most benefit from that type of property. It must be acknowledged, however, that in many areas of the country, there will not be sufficient suitable social lettings of the right size in existing general needs or supported housing stock to accommodate those moving out of hotels within the time available. Some councils may also decide that, where clients would not be in priority need under the homelessness legislation, and would not normally be a priority for a social let, then other options are considered more appropriate.



## Case Study 5

### Wigan Council and The Riverside Group

Your Housing Group and Jigsaw formed the Springboard partnership and currently manage the homelessness supported housing service in Wigan. This is a mixture of hostels, shared houses and flats for people with a range of support needs.

In Wigan there is a weekly multi agency meeting to review the current situation due to COVID-19, which the council housing options team, homelessness commissioning team, the Springboard partners, drug and alcohol team, public health and The Brick (who are operating the hotel with Wigan Council) attend.

There have been a number of move-ons out of the hotel into Springboard's supported accommodation. The partnership have been working with the council and The Brick to identify people who are ready to move on from the hotel. So far five people have been successfully resettled and three more have been identified for the next properties.

Riverside are in discussions with the Council to see if they can develop a supported housing scheme for some of the women in the hotel. These women are vulnerable and have complex needs. Working with the council, people living in Springboard supported housing will be offered tenancies with floating support. This will free up supported accommodation for women with higher support needs.



### Accommodation leased by housing associations or charities

Another possible solution for some clients with support needs is for housing associations or charities to lease self-contained studio or 1-bed private rented sector accommodation and let it to those exiting hotels and hostels. This could be on a short-term or longer-term basis, with the housing association or charity letting accommodation and providing housing management.

If such leased accommodation meets a local need and provides “specified accommodation” as defined in the housing benefit regulations<sup>2</sup>, then it may be possible for housing associations or charities and local authorities to agree a level of rent which makes leasing viable for the client group being considered, including the provision of an appropriate level of housing management.

Some housing associations and charities are already providing non-commissioned supported housing in this way and have arrangements with local authorities to provide nominations. Where such accommodation is already suitable and allows social distancing guidelines to be followed, then it may be possible to use it for the accommodation of former rough sleepers.

In other cases, it may be possible for local authorities to enter into new arrangements with housing associations or charities to provide good quality accommodation of this type, which

---

<sup>2</sup> HB Circular [A8/2014](#) gives a definition



can potentially provide a sufficient level of support and intensive housing management for clients who need it, at a lower cost to the local authority than might otherwise be the case.

Depending on local arrangements and the needs of individual clients, housing association leased accommodation could be used on an interim basis or long term to accommodate single homeless clients.

It is important to note, however, that for providers registered with the Regulator of Social Housing, the accommodation would normally need to qualify as “Specialised Social Housing” in order for rents not to be subject to the Rent Standard<sup>3</sup>. This sets a high bar for the level of support needs of residents, and the level of support which needs to be provided.

The Regulator of Social Housing<sup>4</sup> has made clear that it expects registered providers offering specialised social housing to have proper internal controls on rent setting and should set rent levels agreed with the commissioning body, i.e. the local authority in this case.

Charities which are not registered providers are not subject to the same regulations on the level of support which needs to be provided or the level of support needs of those accommodated. However, the housing benefit rules for specified accommodation let by non-RPs are less generous and there is consequently likely to be a cost to the council.

This suggestion will only work with reputable providers and where clear quality standards are agreed between councils and those providers. The reported abuse of the specified accommodation housing benefit rules by some providers in the market to provide poor quality accommodation with poor quality support reported in some areas is very much to be discouraged.

Support, which is not covered by housing benefit, must be separately funded.

---

<sup>3</sup> [Rent Standard 2020](#)

<sup>4</sup> RSH [Setting Rents for Social Housing: Addendum to Sector Risk Profile 2019](#)



## Case Study 6

### London Borough of Hillingdon

Hillingdon Council is working in partnership with a local charity, Trinity Homeless Projects, to provide supported HMO accommodation for single homeless adults.

Working with local landlords, Trinity has been able to lease houses and convert into five and six bed homes which it then can offer to homeless clients that have been assessed by Hillingdon Council.

Because Trinity is a charitable organisation providing supported accommodation they are able to claim enhanced housing benefit that allows them to fully fund and provide a holistic intensive housing management service which provides support and supervision for residents. Trinity also provide personal coaching, support in living skills and access to employment and training. Trinity also looks to move on residents when they are ready to do so.

To ensure a close relationship, Trinity sits on the council's Rough Sleeper and Homelessness Strategy Delivery Group and they are a key partner in the council's Rough Sleeper Initiative Programme. All the properties are licenced as HMOs to ensure they are safe for the residents and Hillingdon has further service-level agreements in place with Trinity. Trinity has a long history of working with Hillingdon and is therefore a trusted partner.

To date, Trinity has more than 230 beds in 44 properties and was able to rehouse well over 100 single homeless clients in the past 12 months. Hillingdon is also in the process of leasing a six bedroom property to Trinity in order for them to further expand the rooms available for this client group. This is a model that Hillingdon would like to replicate with local housing associations as it has the potential to significantly increase housing provision for single homeless people.



### Repurposing of new or existing provision

There may also be local opportunities for councils to work with housing associations on available opportunities to change the current or intended use of accommodation owned by housing associations in order to serve the needs of rough sleepers. Such opportunities could include:

- temporary or long-term conversion of RP accommodation intended for market rent or for sale to affordable rent accommodation. This may be facilitated by the slow-down in the commercial market difficulties some housing associations are experiencing. There may be considerations associated with the design and the financing of properties, or with planning permission, which present barriers to such a change of use, but it is worth exploring the options as part of a strategic discussion with local providers
- conversion of sheltered accommodation, commercial buildings, or other accommodation no longer required for its original use to accommodate this client group on an interim or longer-term basis, depending on suitability.

- adaptation of RP owned hostels or supported housing not currently compatible with social distancing to make them suitable in the new circumstances
- acquisition by housing associations of street properties or properties in new developments for use as social or affordable rented accommodation. This could potentially use capital funding from RPs, from councils, from institutional investors, or a combination of sources
- use of sites owned by housing associations which have not yet been developed out to provide demountable prefabricated pod or modular accommodation capable of maintaining social distancing rules
- review of disposal lists to assess whether any properties earmarked for disposal could be repurposed for this use

Capital grant may be required to support these options in some cases. Councils can explore with MHCLG whether any of the new capital funding now available to help end rough sleeping and intended to deliver 6,000 units of accommodation, could be available for this. Councils should approach their MHCLG Homelessness Advice and Support Team (HAST) or Rough Sleeping advisor in the first instance.

### Case Study 7

#### **Greater Manchester Housing Providers: collective response to emergency resettlement**

Greater Manchester Housing Provider (GMHP) is a partnership of 25 housing associations working in the 10 local authorities of the city region, collectively housing over half a million residents. Working with the combined authority, GMHP have agreed to assist in the rehousing of 311 guests directly from hotel accommodation and other temporary accommodation. A significant proportion of this accommodation will be used for Housing first.

This above will be achieved by all members committing to:

- Pledge all available and appropriate properties to GMCA/Las for an initial period of four months to allow for matches to be made
- Pledge all properties to the Combined Authorities “Ethical Letting’s Agency” Programme for six months
- Commit to a “No Eviction” policy
- Partner with charities who have accommodation but need Housing Provider support for Housing Benefit claims

### **Social impact investment**

Councils interested in procuring accommodation and support may be interested in exploring the options to commission services for rough sleepers on a payment for outcomes basis, with the aim of achieving better value for money for the achievement of outcomes including sustained accommodation and employment.

Social Impact Bonds are a way in which public sector commissioners, including local authorities, can contract services on the basis of what they



achieve, rather than paying only for the service itself, with some of the risk taken by social investors. An overview of SIBs can be found at <https://www.gov.uk/guidance/social-impact-bonds>

There have been several examples of successful Social Impact Bonds working with rough sleepers with complex needs including the [GM Homes Partnership](#).

Councils can contact the government's [Centre for SIBs](#) for more information [Centreforsibs@culture.gov.uk](mailto:Centreforsibs@culture.gov.uk)

## 2.5 Private rented sector

### 2.5.1 Background

It is clear that not all clients accommodated in hotels or other facilities in response to COVID-19 can be accommodated long-term by social landlords, and that the private rented sector (PRS) has a key role to play, either in provision of accommodation now, or as a longer-term option. Many short-term rough sleepers or night shelter residents do not have significant support needs, and the majority of those seen sleeping rough by outreach teams are only seen sleeping rough on one occasion.

Private rented accommodation can potentially accommodate people with a wide range of support needs if appropriate support to landlords and tenants is provided. Even Housing First accommodation, for those with the highest support needs, is being provided successfully within the private rented sector.

It is important that private rented accommodation provides appropriate quality and security to meet the needs of the client group. This can sometimes be challenging, especially in areas where private rented accommodation available to low-income households is in short supply. Councils can mitigate this by putting in place inspection processes and ensuring properties meet standards set out in the Housing Health and Safety Rating System (HHSRS).

### 2.5.2 Opportunities

#### Existing PRS Access schemes

Many local authorities have a successful relationship with private sector landlords which has been developed over many years, either directly or via voluntary sector PRS access schemes to which they nominate or fund.

Councils maintain a list of schemes around the country in their [Help to Rent database](#).

We understand from informal discussions with the voluntary sector and landlords' representatives that there may currently be an opportunity to expand these schemes. This is due both to the private lettings market slowing as result of COVID-19, and as a result of the increase in Local Housing Allowance levels since April which has brought them closer to market rents.

However the Overall Benefit Cap has not risen to reflect the increase in LHA levels, meaning that in some more expensive areas of the country, and especially in much of London, the new LHA levels are effectively not applicable to clients who are subject to the OBC because they are unemployed or do not work sufficient hours.



## Leasing

Another option is for private rented accommodation to be leased. As discussed above this could in certain circumstances be done by RPs, or could be by other providers or agents. Both RPs and charities may be able to designate such accommodation as Specified Accommodation in order to make leasing with the required amount of housing management a viable option, and to enable provision of accommodation to under 35s, who would be impacted by the Shared Accommodation Rate (SAR) restriction in Universal Credit and Housing Benefit, if the accommodation is classified as PRS. Some clients who are under 35 are [exempt](#) from the SAR restriction, for example those over 25 who have previously lived for at least three months in a hostel where support was provided.

[https://england.shelter.org.uk/housing\\_advice/benefits/benefits\\_for\\_under\\_35s\\_in\\_shared\\_housing](https://england.shelter.org.uk/housing_advice/benefits/benefits_for_under_35s_in_shared_housing)

Where charities (as opposed to RPs) let accommodation as specified accommodation, only 60% of the additional housing benefit claimable to fund the extra housing management needed to accommodate single homeless people with support needs is likely to be reclaimable by councils from DWP, and so this will have a cost to the local authority.

Housing Benefit for residents living in specified accommodation does not count towards the Overall Benefit Cap.

Leasing PRS supply as temporary accommodation can also be done by councils. Councils leasing accommodation will in most cases be limited to claiming from DWP the 90% of 2011 LHA rates applicable to temporary accommodation, as councils leasing accommodation for other purposes are likely to have to account for the accommodation within the Housing Revenue Account.

Accommodation leased by organisations other than local authorities can be let at LHA rates if it is classified as private rented, and is then subject to the same benefit rules as other private rented accommodation.

## Increased LHA rates

Obtaining accommodation from the private rented sector may also be made easier by the increase of Local Housing Allowance rates across the country to 30<sup>th</sup> percentile rents from 30<sup>th</sup> April. Both the new and old LHA rates are shown [here](#) for all areas of England.

The largest increases have been in the areas where LHA rates had fallen the furthest behind market rents, with increases of over 40% for some property sizes in some areas. On average across England, LHA rates have increased by between 11% and 15% depending on the property size needed.

As already mentioned, however, in some areas the full increase is not available to those affected by the Overall Benefit Cap.

## Tenant Fees Act exemption

It is also worth noting that the [Tenant Fees Act, 2019](#), which specifically prohibits up-front fees to landlords, contains an exemption for local authorities who need to make an incentive payment to a landlord in order to secure a PRS property. This potentially gives local authorities an advantage in securing properties in parts of the country where properties at LHA level rents are the hardest to find. This of course does not mean that councils should be bidding up prices, or paying more than they need to, especially if competing with other local authorities for the same accommodation. The London Inter Borough Accommodation Agreement and work on joint procurement through [Capital Letters](#) are examples of successful collaboration to prevent competition between councils driving up the costs of accommodation.



## Services to landlords and tenants

Despite the April LHA increases, PRS properties for tenants with a history of homelessness may be difficult to secure in the private rented sector, due to landlord concerns about housing this client group. Councils can help with this by setting up good quality landlord and tenant support services to reassure landlords that help will be available in the event of any problems, such as anti-social behaviour or rent arrears.

Provision of resettlement support and floating support where needed is likely to be attractive to landlords. One of the most important requirements for many landlords is that they feel they have someone at the council who they can turn to in the event of difficulties, who is easily contactable, and who will be responsive in helping to address the problem.

If these things are in place, and if local authorities operate proper procedures in order to ensure that properties are safe, well maintained and provide good quality accommodation, then the PRS can potentially be an important part of the solution.

The National Residential Landlords Association have produced [guidance](#) on dealing with COVID-19 in private rented accommodation.

## 2.6 Other

### 2.6.1 Background

This section covers a range of other provision which local authorities may be able to consider, depending on their local housing markets.

### 2.6.2 Opportunities

#### Private developments

Engaging with developers about units intended for sale is not likely to be fruitful for an interim solution, so those nearing completion that are designed for the rental market are likely to be more useful. As the planning authority councils will be aware of developments in progress in their area. If leasing apartments in a block is being contemplated, the council or a partner organisation may have to take a lease of the whole block, in view of perceptions. A bond or other contractual obligation to undertake repairs, cleaning and redecoration is likely to be needed at the end of the lease.

There could also be owners of permitted development conversions in city centres who would welcome an overarching lease to a council on a short-term basis. Councils thinking of making use of such accommodation should exercise considerable care to ensure that such developments are suitable for the client group in terms of space standards and management, and ensure that accommodating this client group is compatible with other residents who may already be living there.

Longer term there may be opportunities to acquire accommodation intended for sale from developers, if the housing market does not quickly pick up. However, as dispersed accommodation is preferable for permanent housing, these opportunities may be limited.

In any event councils should make use of the contacts they have with developers through their roles as planning authorities to understand what opportunities exist locally.

#### Empty properties



Councils may be able to source additional accommodation through empty properties in the private sector. Targeted work with councils' empty property teams may be fruitful.

### **Student accommodation**

A number of higher education providers have announced they will not be teaching face to face until 2021, which could lead to difficulties in filling student accommodation, at least in the short term. If accommodation is self-contained this may be an opportunity for interim move-on accommodation.

There may also be soon to be completed student accommodation that could be available.

Councils in towns and cities will have high level contacts with the higher education providers in their area, and these should be used to explore what potential there may be for under-utilised student accommodation to be used. In addition the MHCLG Taskforce is engaging nationally with student accommodation providers.

### **Caravan and mobile home parks**

Caravan and mobile home parks, where assessed as suitable and where there is limited local demand due to current circumstances, could be used as interim accommodation to move on from hotels before individuals are offered a permanent home.

Again, councils are likely to have contacts with the operators in their area and could reach out to them to discuss opportunities.

### **Vacant retail space**

Some notable retail brands have gone into administration in recent months and many areas have vacant retail units in their towns and cities. Some of these are units in high streets that would not convert readily, but some are larger, which may have potential for conversion to self-contained units, perhaps with one of the modular temporary buildings suppliers, which there are on government frameworks. For the longer term, councils could purchase in-town stores from receivers to help assemble sites for redevelopment.



## Case Study 9

### Basildon Borough Council

Basildon Borough Council has received a total of 43 approaches from rough sleepers. 58% came in the initial wave of “Everybody in”, with the remaining 42% being received after March 27th. With only five individuals found in Basildon’s rough sleeper count in Autumn 2019, this was a considerably higher amount than anticipated, with many becoming known to the council for the first time.

The council currently has 28 rough sleepers accommodated in hotels and are in the process of offering accommodation in the private sector to all those in receipt of public funds. All approaches have been dealt with in accordance with the Homelessness Reduction Act, with assessments being undertaken and applications taken under the relief duty.

7 people have been placed successfully in the PRS. The council has also worked with clients on expectation management to reduce the possibility of accommodation offers being refused.

Working closely with colleagues at Essex County Council and agencies such as Peabody South East, all rough sleepers are having support and recovery plans drawn up. This will help identify any assistance that may be required from other agencies to help secure and maintain tenancies. In addition, councils in Essex are meeting frequently to produce a unified recovery plan across the County.





## 3 SOURCING SUPPORT

### 3.1 Introduction

All of the best practice we have accessed during preparing this briefing has stressed the critical importance of councils understanding in detail the needs of the people currently accommodated, including their support needs, so that the right solution can be sourced to give each individual the best chance possible of moving to a permanent home and sustaining a tenancy.

Councils will need to carry out individual assessments of everyone currently accommodated in hotels and other emergency accommodation as detailed in Section 2.2.

### 3.2 Housing First

One of the most widely reported and encouraging experiences from councils is that rough sleepers with complex needs, who have been entrenched on the streets for long periods, have come into accommodation and engaged with services during the COVID-19 crisis in a way which is unprecedented. This provides a unique opportunity to work with people to develop individual, tailored solutions to their needs. Crisis provides guidance on a “by name” approach.

<https://toolkits.homelessness.world-habitat.org/start-making-changes/by-name-list-details/>

Many of these individuals will need bespoke personalised support away from a hostel setting, including to meet health and care needs, if they are not to return to rough sleeping. Housing First, a supported housing model which involves providing a tenancy and intensive long-term support, is likely to be the most appropriate way forward for some. This is not a low cost option, but working to support this group is likely to be a priority for many councils, and evidence shows that this is a highly effective approach to ending homelessness for people experiencing multiple disadvantage.

Homeless Link have produced helpful [guidance and other resources](#) on Housing First for commissioners, and are also happy to give specialist telephone advice to local authorities interested in setting up a Housing First service. Please e-mail: [joanne.prestidge@homelesslink.org.uk](mailto:joanne.prestidge@homelesslink.org.uk)

### 3.3 Support providers in the voluntary and charitable sectors

Many councils commission support services from voluntary and charitable sector and housing association providers. Current circumstances may require contract variation or recommissioning of these services to direct resources to where the client group is currently located and according to changed needs.



## Case study 10

### Cambridge City Council new service model development

At present, there are 118 people housed in temporary accommodation in Cambridge. A working group of caseworkers and managers was formed in order to assess housing and support needs for this cohort. People were placed in one of four groups depending on the severity of their support needs. This enabled the group to identify the most appropriate housing solution for each person.. The options identified were:

Housing First – self-contained accommodation for individuals with multiple and complex needs with intensive wrap-around support (ratio one caseworker to six tenants)

Pods – new, self-contained modular homes in the city, for individuals who would struggle to access shared or supported accommodation, with regular, tailored support (ratio 1:10)

“Hostel Route” – existing, traditional supported accommodation

Supported Shared – shared houses (usually 2-bed) for people who would be capable of sharing with others but would struggle with “mainstream” accommodation. Support provided (ratio 1:10)

Statutory Route – assistance under existing homelessness and/or social care duties, resulting in a social tenancy or a social care placement

Private Rented Sector – shared accommodation for individuals with low to moderate support needs. Support provided (ratio 1:10)

Reconnection – assistance with moving to another part of the country (or another country)

Work is now ongoing to calculate numbers of vacancies. A “plan A” and “plan B” will be offered to every individual currently housed under the COVID-19 measures. There is still likely however to be a shortfall in available accommodation. To address this, the working group is developing links with student accommodation provision in the city to utilise units which are likely to be available due to lower student populations next year, especially from overseas students. The model proposed is for properties to be leased to a Housing Provider who will provide Housing Management, while a local voluntary group previously involved in street outreach provides the support. The model is dependent on being accepted as Housing Benefit Exempt to cover costs of additional intensive housing management.



## 3.4 Adult social care

Some individuals will be in need of more support than a housing or supported housing solution can provide. It is critical in these cases that adult social care is involved to provide an assessment and to be involved in care planning. In two-tier areas in particular it is important to make the right connections with adult social care services and for these to be reinforced at a senior level.

### 3.5 Health services

This cohort of people [report and experience much poorer health than the general population](#), and face barriers to accessing health services; ill-health and health conditions may be undiagnosed and untreated (it is unlikely individuals will be recognised as being in need of shielding). It will be important to work with local NHS organisations and public health teams - particularly commissioners of drug and alcohol treatment services,<sup>5</sup> to ensure that those who need them have health needs assessments and that they develop plans to meet the gaps in health requirements that are identified through these assessments. Councils should work with the local NHS to ensure continuity of care as people move between services or pathways. Pre COVID-19 case studies of successful work between councils and the NHS on health and homelessness are [available here](#).

#### Case Study 11

##### Blackpool Council multi-disciplinary homelessness health team

Prior to the COVID-19 outbreak, Blackpool Council used funding from the government's RSI programme to set up a multi-disciplinary homelessness health team. The team sat in Housing Options but also included mental health support and drug and alcohol support from the local NHS hospital trust.

Housing Options worked very closely with Public Health on establishing the team. Through Public Health, the local CCG have engaged with the model to the extent of funding its continuation for a further two year pilot period, with a view to longer term funding if successful. The CCG has also funded the addition of physical nursing care, and the lived experience team are involved in co-production of the service as it develops.

This platform having been established, Blackpool was able to very rapidly assemble a virtual multi-disciplinary team to support homeless people with COVID-19 symptoms, which has been very effective.



### 3.6 Criminal justice

#### MoJ Regional Homelessness Prevention Taskforces

The Ministry of Justice has established a Homelessness Prevention Taskforce (HPT) in each regional probation division to which is tasked with working with local authorities and other partners to help prevent rough sleeping during COVID-19.

Each task force aims to identify prisoners at risk of homelessness on release, including those being considered for early release to reduce COVID-19 infection risks whilst in custody, and those being moved from approved premises and bail accommodation.

---

<sup>5</sup> <https://www.gov.uk/government/publications/health-matters-rough-sleeping/health-matters-rough-sleeping>



The intention is to identify housing pathways to prevent homelessness and support moves in to settled accommodation and to work across the system with public, private and voluntary sector partners.

Councils can contact the HPT in their area to discuss how they can work together in the current crisis, and should do so especially where established and effective relationships with probation services to prevent homelessness and rough sleeping do not exist. Temporary funding has been made available to support the work of the HPTs.

The mailboxes for the Homelessness Prevention Taskforces in England and Wales are as follows:

Taskforce	Email
Midlands Probation Taskforce	<a href="mailto:Midlands.ProbationTaskforce@justice.gov.uk">Midlands.ProbationTaskforce@justice.gov.uk</a>
Wales Probation Taskforce	<a href="mailto:Wales.ProbationTaskforce@justice.gov.uk">Wales.ProbationTaskforce@justice.gov.uk</a>
London Probation Taskforce	<a href="mailto:London.ProbationTaskforce@justice.gov.uk">London.ProbationTaskforce@justice.gov.uk</a>
East-KSS Probation Taskforce (East of England/Kent, Surrey and Sussex)	<a href="mailto:East-KSS.probationtaskforce@justice.gov.uk">East-KSS.probationtaskforce@justice.gov.uk</a>
SWSC Probation Taskforce (South West/South Central)	<a href="mailto:SWSC.probationtaskforce@justice.gov.uk">SWSC.probationtaskforce@justice.gov.uk</a>
NWGM Probation Taskforce (North West/Greater Manchester)	<a href="mailto:NWGM.probationtaskforce@justice.gov.uk">NWGM.probationtaskforce@justice.gov.uk</a>
NEYH Probation Taskforce (North East/Yorkshire and the Humber)	<a href="mailto:NEYH.probationtaskforce@justice.gov.uk">NEYH.probationtaskforce@justice.gov.uk</a>

### 3.7 Other partners

The challenge of rehousing this cohort of people in suitable permanent accommodation is one which cannot just be borne by councils. Public sector partners including councils, NHS, CCGs, HM Probation Service, and Police and Crime all have a role to play in making this initiative a success. Existing multi-agency fora should be used to involve these agencies in plans and commitments.



## Case Study 12

### Everyone In - Derbyshire Response

Derbyshire Districts have a strong working relationship through the Derbyshire Homelessness Officers Group, a long-standing forum that provides the basis for shared problem solving and resolution of issues.

Individual council rough sleeping numbers are low but the call to get “Everyone In” required a collective response. In Derbyshire, councils have brought in 80 people so far, with the majority having been placed in hotel accommodation. At the start of the crisis a combination of local councils and Derbyshire County Council came together to collaborate on the temporary acquisition of hotels to create much needed extra housing capacity to shield a large portion of the homeless and rough sleeping cohort. This jointly funded initiative was only possible because of the history of partnership.

This has been a major success and homeless and rough sleeping out-reach services, drug and alcohol teams, NHS teams, Police and council housing staff have all pitched in.

Some of those placed have already been found longer term accommodation, and a recovery plan has already been written to deliver intensive support to individuals experiencing overlapping and challenging issues such as offending, drug and alcohol misuse and poor mental health.

Those placed have been given three hot meals a day and it is hoped for some this stability will give them a chance to seek a more permanent change especially as support to each individual will continue. Collective action has been rapid and the multi-agency collaboration very strong, something achieved by working together over many years.





## 4 FUNDING AND PROCUREMENT

### 4.1 Introduction

This section discusses how sourcing accommodation and support may be funded and procured via existing routes. It includes both government capital and revenue grants, and how housing benefit is available to support this client group.

### 4.2 Funding

#### 4.2.1 Local authorities

##### **COVID-19 Funding**

Councils across the country have received allocations from the £3.2 Billion COVID-19 emergency funding

##### **Rough Sleeper Initiative (RSI)**

Many councils have received funding for 2019/20 from the government's £112m RSI programme. MHCLG are open to requests to change the use of this funding in order to meet current needs.

An example where this might make sense is if an area has received funding to develop a Somewhere Safe to Stay hub, which would be unlikely to allow COVID-19 social distancing rules. It may be a better use of this funding to provide floating support for clients being moved out of hotels into self-contained accommodation.

There are many other examples of how RSI funding could be better spent in the new circumstances. Councils should contact their MHCLG RSI or HAST advisor to discuss this in the first instance.

There are a number of instances where RSI funding has been used to fund NRPF support, at the discretion of councils.

##### **New Government Rough Sleeping Funding**

Significant funding was announced in the 2020 budget to help rough sleepers. This was split at the time into £144m revenue towards general support services, including access to training, and £237m capital funding to fund accommodation making a total of £381m. This has now been increased to £433m, an increase of £52m in revenue support. In order to deliver 6,000 new units of accommodation, £160m will be brought forward to 2020/21, £30m of which is revenue support.

In addition, £262m revenue for substance misuse recovery services to help end rough sleeping was announced in the budget. Work is underway to model how this spend can best support effective move-on for people in emergency accommodation who are ready to engage and will benefit from treatment; councils will want to ensure they understand how many people are in this position, and information on how it is to be allocated will be announced in due course. It is clear that the government will wish for much of this funding to be directed towards supporting solutions for those affected by the COVID-19 crisis.

An existing £50m move on fund continues to be administered by Homes England, of which there are remaining funds.



Councils should therefore consider what use they could best make of additional capital and revenue funding and discuss this with their HAST or RS adviser.

### **Flexible Homelessness Support Grant (FHSG)**

Some councils may be able to redeploy some of their FHSG funding to support homeless people accommodated during the COVID-19 crisis, although many will have already fully committed their allocation.

### **Life Chances Fund**

The government's Life Chances Fund awarded top up funding to local authorities wishing to extend the Single Homeless Prevention Service, [SHPS programme](#), which was initially set up by LB Brent, and in which voluntary sector providers prevent and relieve homeless for single people on a payment for outcomes basis, with upfront service costs funded by social investors.

A number of councils, currently all in London, have already agreed to adopt this approach. New local authorities who wish to join the service will be eligible to apply for a 35% grant from central government to part pay for the outcomes. Councils need to register their interest before **24 June** to be eligible for this support. Those interested should contact Conor Sullivan at Bridges Outcomes Partnerships: [Conor@bridgesoutcomespartnerships.org](mailto:Conor@bridgesoutcomespartnerships.org)

### **Local authority capital programme**

Councils' capital programmes may be able to be realigned to provide some capital.

### **Right to Buy receipts**

In some cases councils with unspent Right to Buy (RTB) receipts could use these for this purpose, albeit within the current rules, where councils cannot use RTB receipts to fund more than 30 per cent of the cost of new homes, and they cannot be combined with grant funding from Homes England.

### **Local authority borrowing**

If development or purchase of new homes for rough sleepers can deliver a positive return, taking into account Minimum Revenue Provision, then councils can consider borrowing for this purpose. With Public Works Loan Board (PWLB) rates at very low levels and Local Housing Allowance (LHA) uplifts meaning the rents payable by Housing Benefit should, subject to OBC restrictions for some clients in some areas, now cover the lower third of private sector rents in any given area, development appraisals may produce more positive results.

## **4.2.2 Housing associations**

The Affordable Homes Guarantee scheme is designed to give RPs access to cheaper finance than would otherwise be the case. This is a well-established scheme, familiar to RPs, and a new scheme operator is about to be selected ready for the new roll out in three to four months. There may be an opportunity for the bespoke delivery of supported accommodation as part of this initiative, although the development of new supported housing has slowed significantly in recent years.

## **4.2.3 Social Investment Capital Funding**

[Big Society Capital](#) is working closely with social investment funds across the country, as well as with government, in order to put together a nationally co-ordinated investment programme to quickly acquire properties providing good quality accommodation for homeless people accommodated during COVID-19.



They have identified a pipeline of 250-400 units worth circa £60m, to be mobilised in the next six months.

Local authorities interested in this, and especially those interested in finding out about becoming co-investors, should contact Karen Ng at BSC [KNg@bigsocietycapital.com](mailto:KNg@bigsocietycapital.com).

#### 4.2.4 Other government funding

##### Housing First

Government awarded £28m to pilot the scaling up of Housing First in three combined authority areas; West Midlands, Greater Manchester and Liverpool City Region. In addition over the last decade over 60 other Housing First services have been developed at a local level in England, the majority funded by local authorities.

Councils may wish to explore developing Housing First for the individuals whom they assess as requiring this level of support. Research from England, guidance and other resources can be found on Homeless Link's Housing First England website [here](#).

Councils wishing to consider Housing First can contact Jo Prestidge at Homeless Link who will be able to provide more information about the steps to take.  
[joanne.prestidge@homelesslink.org.uk](mailto:joanne.prestidge@homelesslink.org.uk)

#### 4.2.5 Housing benefit

Many councils have already established benefit claims for clients accommodated in hotels. The available benefit is highly unlikely to cover the full cost of hotel provision, as it will normally be limited to the 1-bed January 2011 LHA rate. Nevertheless, this can make a significant contribution to costs, and it may be possible for housing benefit departments to backdate claims where these have been delayed due to the unusual circumstances.

Clients moving into accommodation provided by an RP or a charity, where support linked to the provision of accommodation is offered, may be entitled to claim additional housing benefit due to the need to pay for additional housing management, if the provision meets the [Specified Accommodation](#) definition.

The level of benefit available should be agreed between the local authority and the provider, and the local authority should agree sufficiently robust oversight arrangements to ensure that high standards are maintained. This may be a way of making leased self-contained accommodation viable and ensure that a properly funded housing management service can be provided for clients who would be at risk in general needs social housing or the PRS.

#### 4.2.6 Voluntary and charitable sectors

Funds could be available locally from the voluntary and charitable sectors. Councils should use their contacts with local voluntary organisations to identify additional bespoke funding for this client group and seek to co-ordinate efforts with third sector partners.

### 4.3 Procurement and modifying existing contractual arrangements

Councils will need to act quickly in many cases in order to source accommodation and support for this client group. One potential barrier to acting quickly is the requirement to follow procurement rules.



Procurement of accommodation and associated housing management falls outside the requirements on local authorities to procure services competitively. However, services such as new or additional floating support or accommodation-based support fall under procurement regulations and would normally need to be tendered for. In other cases councils may have a contract e.g. for a night shelter, which has been closed and would like to make use of the staff in order to support people who have been move to self-contained accommodation.

In recognition of the urgent need to move quickly to deal with the COVID-19 crisis, the government has issued Procurement Policy Notes [PPN 01/20](#) and [PPN 02/20](#) in response.

Under PPN01/20 the usual rules to enter into contracts for goods, works and services can be bypassed, so long as there are genuine reasons for extreme emergency that could not have been foreseen. A policy of rapidly housing all rough sleepers during a pandemic would fall into this.

For floating support (drug and alcohol services for example that wrap around the client but not directly related to housing):

- some councils will already have contracts in place to cover this. Under the PPN they would be allowed to extend the arrangements already in place
- If the council does not have an arrangement in place, but due to COVID-19 they have a genuine extreme emergency in needing to put this contract in place then they can either
  - Do a direct award
  - Call off from a framework or DPS that would be run by one of the professional buying organisations (YPO, ESPO, CCS)
  - Call for competition using accelerated timescales

If a council has funded a night shelter that has temporarily been closed, whether the staff could be redeployed to provide floating support would depend on whether the staff in question have been furloughed (in which case they CANNOT work **for the same employer** whilst they are furloughed) or whether the council have paid the night shelter “supplier relief” under PPN02/20 (in which case they CAN be redeployed).

The current PPNs expire at the end of June.



### Case Study 13

#### LB Lewisham

Lewisham Council has seen, and continues to see, significant increases in rough sleeper presentations since the start of the COVID-19 pandemic.

In the short term the council will continue to provide accommodation for rough sleepers in temporary accommodation, with arms-length and visiting face to face support provided by their internal Rough Sleeping Team in partnership with commissioned providers. Additionally, the council has blocked booked 20 beds in what is ordinarily student accommodation until end August, and are working with MHCLG and a local provider to repurpose resources and staffing previously allocated to now-closed night shelter provision in order to support staff on site. This work is accompanied by ongoing efforts to resettle people sustainably according to their needs, whether in the private rented sector, socially, or in supported housing.

In the medium term, from September, Lewisham is investigating more sustainable options for short term rough sleeper accommodation for the period up to the end of 20/21. This will need to be self-contained as far as possible, and will be building on the current work by looking to local partners for accommodation units as a block and with a support provider offering support.

Like many other councils, Lewisham is considering the complex local, regional and national implications for longer term provision which the COVID-19 outbreak and response has highlighted.



## 5 FURTHER HELP

### 5.1 Introduction

This section discusses where further help and guidance can be accessed.

### 5.2 Guidance and good practice

#### **LGA COVID-19 Hub**

The LGA has developed an online [COVID-19 resource hub](#) providing information on the broad range of issues to support council's local responses to the COVID-19 emergency.

Councils wishing to access further help can contact the [LGA's principal advisors for each region](#).

Councils may also wish to refer to the LGA's [web based resources on housing and homelessness](#).

#### **Homeless Link COVID-19 Transition Guidance**

Homeless Link have produced helpful briefing for local authorities and others on [planning local homelessness provision and move on](#)

Homeless Link can also help local authorities to co-ordinate support from voluntary sector organisations in their area, provide advice on Housing First, and on trauma informed approaches to working with rough sleepers.

#### **Good practice from local authorities in providing accommodation solutions for homeless households**

A discussion of good practice and a resource library of examples from councils around the country in providing temporary accommodation, private rented accommodation, property acquisitions and other relevant material is available in the LGA "[Housing Our Homeless Households](#)" report.

#### **Homelessness strategies**

It is clear that the landscape in providing homelessness services is changing in a way that goes beyond the immediate issue of rough sleepers helped off the streets during lockdown. Many local authorities will want to work with partners to review their local homelessness strategies in the light of the new circumstances. The LGA's guidance on developing homelessness strategies may be helpful in this and is available [online](#).

#### **Joint working between local authorities and housing associations on homelessness**

The results of a series of workshops conducted by the LGA and NHF on joint working between councils and housing associations are available [here](#).

#### **Joint working with health and care partners**

Councils will want to continue to develop relationships with health and care partners to help assess needs and enable continuity of care as people move on. NHS England and Improvement manage a homeless health group on the Future NHS collaboration platform (email [england.covid-homeless@nhs.net](mailto:england.covid-homeless@nhs.net) to register for free). The Healthy London Partnership also offer a range of homeless health resources (relevant to out of London councils too).



## Centre for Homeless Impact COVID-19 Housing Costs Calculator

The [Centre for Homelessness Impact](#) has developed an online [Housing Costs Calculator](#) specifically to help local authorities to obtain rough estimates of the costs of moving people who are currently in hotels and in shared temporary accommodation to the private rented sector with appropriate levels of support. Future iterations of the Calculator will also include other types of tenure and additional functionalities.

### Crisis

More detailed information and advice on how to assess the needs of clients accommodated in hotels and other emergency accommodation has been produced by Crisis:

- <https://crisis.org.uk/ending-homelessness/resources-for-practitioners/covid-19-transition-planning/>
- <https://crisis.org.uk/ending-homelessness/resources-for-practitioners/housing-centre-guides/local-needs-assessment/>

Crisis have also developed a “by name” approach.

- <https://toolkits.homelessness.world-habitat.org/start-making-changes/by-name-list-details/>

## **Jenny Coombs**

Programme Director, Local Partnerships

[jenny.coombs@local.gov.uk](mailto:jenny.coombs@local.gov.uk) | 07769 648 274

[localpartnerships.org.uk](http://localpartnerships.org.uk) | @LP\_localgov

### **Disclaimer**

This report has been produced and published in good faith by Local Partnerships and Local Partnerships shall not incur any liability for any action or omission arising out of any reliance being placed on the report (including any information it contains) by any organisation or other person. Any organisation or other person in receipt of this report should take their own legal, financial and/or other relevant professional advice when considering what action (if any) to take in respect of any associated initiative, proposal or other arrangement, or before placing any reliance on the report (including any information it contains).

### **Copyright**

© Local Partnerships LLP 2020

---

**Local Partnerships is a joint venture between the Local Government Association, HM Treasury and the Welsh Government.**

We occupy a unique position in the public sector. We facilitate change by working impartially and collaboratively across all parts of central, local and regional government, and the devolved administrations.

We work solely for the benefit of the public sector. Our experts provide trusted, professional support and advice over multiple disciplines, helping you make best use of limited resources as demand for services continues to rise.