



## BRIEFING PAPER

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# Statutory Homelessness in England

By Wendy Wilson  
Cassie Barton

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Contributing authors

Cassie Barton, statistics

## Summary

Local authorities in England have a duty to secure accommodation for unintentionally homeless households who fall into a 'priority need' category. There is no duty to secure accommodation for all homeless people. On 3 April 2018, local authorities acquired a duty to work to prevent and relieve homelessness for all eligible homeless applicants – their advice and assistance duties were also strengthened.

### Experimental statistics

Official statistics on statutory homelessness are published by the Ministry of Housing, Communities and Local Government (MHCLG). For many years, quarterly releases included details of households accepted as owed a statutory duty and numbers in temporary accommodation. Prevention and relief activity by local authorities was recorded separately but then included in the quarterly releases. In December 2018, MHCLG published a new style of statistical release covering the period from April-June 2018. The release differed from previous releases in two ways: it accounted for local authorities' new duties under the *Homelessness Reduction Act 2017* and reflected a new system for collecting statistical information.

Local authorities are now required to submit case-level data to the Ministry via a new system called H-CLIC. H-CLIC provides data on individual people in each household (previously, only household-level data was available). The Ministry has said that H-CLIC should "allow us to better understand the causes and effects of homelessness."

### Increases in statutory homelessness

MHCLG's former releases tracked the number of households found to be owed a duty to secure accommodation (i.e. unintentionally homeless and in priority need). The financial year 2010/11 saw a 10% increase in homelessness acceptances by local authorities, representing the first financial year increase since 2003/4. Homelessness acceptances continued to rise over the next three years but fell by 3% between 2012/13 and 2013/14. The 2014/15 financial year recorded a further increase, with acceptances 36% higher than in 2009/10 (but 60% below the peak in 2003/4). Acceptances increased again in 2015/16 and 2016/17, but fell by 4% in 2017/18 compared to the previous year.

MHCLG's latest release describes local authorities' activity between April and June 2018. The release is classed as 'experimental statistics' because of a number of data quality issues. Several local authorities did not provide any data, and others reported confusion about some of the reporting requirements.

Now, when a household applies to their local authority for assistance, an initial decision is made to determine whether they are owed a prevention or a relief duty. 90% of initial decisions recorded between April-June 2018 found that a duty was owed: 33,330 prevention duties and 25,330 relief duties. Local authorities accepted 6,670 households as being owed a main homelessness duty – since 3 April 2018 households are only owed a main duty if their homelessness has not been successfully prevented or relieved.

The increase in statutory homelessness since 2009/10 is attributed to several factors, of which the most important is identified as a continuing shortfall in levels of new house building, particularly of affordable housing, relative to levels of household formation. Housing Benefit reforms are also viewed as a significant contributory factor, particularly in London. In addition to contributing to levels of homelessness, local authorities in areas of high housing demand argue that benefit reforms are making it more difficult for them to

secure housing for eligible applicants. The foreword to [Homelessness Monitor: England 2018](#) says:

Councils across the country are struggling to house people because of a decline in social housing, spiralling private rents, and welfare cuts. Councils also reported a growing reluctance among landlords to rent to people on welfare, with many worried that formerly homeless tenants would struggle to pay rent and bills.

The [National Audit Office](#) (NAO, 2017) determined that the impact of the Government's welfare reforms on homelessness had not been evaluated:

Homelessness in all its forms has significantly increased in recent years, and at present costs the public sector in excess of £1 billion a year. It appears likely that the decrease in affordability of properties in the private rented sector, of which welfare reforms such as the capping of Local Housing Allowance are an element, have driven this increase in homelessness. Despite this, the government has not evaluated the impact of its welfare reforms on homelessness, or the impact of the mitigations that it has put in place.

Overall, the NAO's report concluded that the Government's approach to tackling homelessness could not demonstrate value for money. The [Public Accounts Committee](#) (December 2017) said the Government's attitude to reducing homelessness "has been unacceptably complacent". The [Government responded](#) to the PAC report in March 2018 and accepted several recommendations. MHCLG has commissioned joint research with the Department for Work and Pensions (DWP) into "the wider causes of homelessness, including households' experience of the welfare system as well as other factors such as housing affordability or relationship breakdown."

## The Homelessness Reduction Act 2017

On 17 December 2015, the Government said it would work with homelessness organisations and across government departments "to explore options, including legislation, to prevent more people from facing a homelessness crisis in the first place."

During summer 2015, Crisis established an independent panel of experts to assess the strengths and weaknesses of the homelessness legislation in England. The panel's findings were published in April 2016: [The Homelessness legislation: an independent review of the legal duties owed to homeless people](#). The panel concluded that the case for reform was strong, and favoured changes to place more emphasis on preventative work within a statutory framework, particularly in relation to single people and childless couples. The annex to the report included suggested amendments to the legislative framework.

Bob Blackman drew second place in the 2016 Private Members' Bill Ballot. He introduced the *Homelessness Reduction Bill 2016-17* on 29 June 2016. The Bill attracted Government and cross-Party support and obtained Royal Assent on 27 April 2017 and came into force on 3 April 2018. As noted above, authorities in England are now required to place more emphasis on the prevention and relief of homelessness for all eligible applicants. By focusing on improved prevention and relief at an earlier stage it is hoped that fewer households will be owed a main homelessness duty and that local authorities will reduce their use of temporary accommodation. The Government is distributing £72.7 million to authorities between 2017/18 and 2019/20 in respect of the new duties. The Act forms a major part of the Government's approach to tackling homelessness.

## Other relevant Library papers

Long-term time series data can be downloaded from the [landing page for this briefing](#). This includes data on decisions made on household prior to the *Homelessness Reduction Act 2017*, and the background of applicants accepted as homeless and in priority need.

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Duties owed to the non-statutory homeless are covered in Library briefing paper: [Rough sleeping \(England\)](#) (2007). A separate paper focuses on the placement of statutorily homeless households in temporary accommodation ([02110](#)). For an overview of statistical indicators see: [Homelessness in England: Social Indicators page](#) (02646). Local-level data on homelessness in England can be viewed using the Library's online tool ([07586](#)).

There are variations in approaches to homelessness in Scotland and Wales – these variations are outlined in [Comparison of homelessness duties in England, Wales, Scotland and Northern Ireland](#) (07201).



# 1. Local authorities' duties: an overview

## 1.1 Duties owed to homeless applicants

The *Housing (Homeless Persons) Act 1977* placed a duty on local housing authorities to secure permanent accommodation for unintentionally homeless people in priority need. Authorities' duties towards homeless people are now contained in Part 7 of the *Housing Act 1996* (as amended).

The *Homelessness Reduction Act 2017* (HRA) has, since 3 April 2018, placed a duty on authorities in England to:

- Work to **prevent** homelessness for **all** eligible applicants who are threatened with homelessness, i.e. likely to become homeless within 56 days.
- Work to **relieve** homelessness for **all** eligible applicants who become homeless.

**Eligibility is determined in relation to an applicant's immigration status.**<sup>1</sup> The new duties stop short of requiring an authority to provide accommodation for homeless applicants who are not in priority need.

**Housing authorities have a duty to provide or secure the provision of advice and information about homelessness and the prevention of homelessness, free of charge.** This advice and assistance must be made available to any person in the district "including people who are not eligible for further homelessness services as a result of their immigration status."<sup>2</sup> The HRA amended the 1996 Act to provide that advice and information services must be designed to meet the needs of people within the district. The particular needs of the following groups must be taken into account:

- a. people released from prison or youth detention accommodation;
- b. care leavers;
- c. former members of the regular armed forces;
- d. victims of domestic abuse;
- e. people leaving hospital;
- f. people suffering from a mental illness or impairment; and,
- g. any other group that the authority identify as being at particular risk of homelessness in their district.

In addition to direct applications from homeless people/households, **authorities may receive notifications from certain public bodies** where they believe a service user may be homeless or threatened with homelessness. The public authorities subject to the duty to refer are

Ineligible applicants should still be able to access free advice and information from a local authority to help relieve homelessness.

<sup>1</sup> MHCLG, [Homelessness Code of Guidance for Local Authorities](#), 2018, chapter 7

<sup>2</sup> MHCLG, [Homelessness Code of Guidance for Local Authorities](#), 2018, para 31

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specified in the [Homelessness \(Review Procedure etc.\) Regulations 2018](#) and include:

- prisons;
- youth offender institutions;
- secure training centres;
- secure colleges;
- youth offending teams;
- probation services (including community rehabilitation companies);
- Jobcentre Plus;
- social service authorities;
- emergency departments;
- urgent treatment centres; and,
- hospitals in their function of providing inpatient care.

The Secretary of State for Defence is also subject to the duty to refer in relation to members of the regular forces. The regular forces are the Royal Navy, the Royal Marines, the regular army and the Royal Air Force.

The public bodies listed above must have the consent of the individual before making a referral to a housing authority and must allow the individual to identify the authority to which the referral should be made. The individual must also have given consent to sharing their contact details with the housing authority.

The [Homelessness Code of Guidance](#), to which authorities must have regard when carrying out their homelessness duties, states that **“Every person applying for assistance from a housing authority stating that they are or are going to be homeless will require an initial interview.”** Where an initial interview indicates that someone is eligible and is homeless or threatened with homelessness, the authority must carry out a further assessment “and **develop a personalised plan to provide a framework for housing authorities and applicants to work together to identify appropriate actions to prevent or relieve the applicant’s homelessness.**”<sup>3</sup>

The Code of Guidance states:

It should be noted that applicants who have been served a valid section 21 notice to end an assured shorthold tenancy of their only available home, which expires within 56 days, **are threatened with homelessness.**<sup>4</sup>

For more detailed information on homelessness arising from the service of a section 21 notice on an assured shorthold tenant, see: [Applying as homeless from an assured shorthold tenancy \(England\)](#).

The new duties introduced by the HRA mean that authorities should actively work with **all** eligible applicants to prevent and relieve homelessness, personalised housing plans are key to this process.

All homeless applicants should be interviewed and, if eligible and homeless or threatened with homelessness, the authority should develop a personalised housing plan.

<sup>3</sup> For more information on assessments and personalised housing plans see chapter 11 of the [Homelessness Code of Guidance](#) 2018.

<sup>4</sup> [Homelessness Code of Guidance](#) 2018, para 11.5

Circumstances in which the prevention and relief duties end are explained in chapter 14 of the [Homelessness Code of Guidance](#).

**Authorities only have an absolute duty to secure accommodation for households who are deemed to be unintentionally homeless and in priority need.**

If an applicant has become homeless unintentionally, the authority must assess whether they, or a member of their household, falls into a 'priority need' category. These categories are set out in section 189 of the 1996 Act and include:

- a. People with dependent children who are residing with, or might reasonably be expected to reside with them, for example, because the family is separated solely because of the need for accommodation; or
- b. People who are homeless or threatened with homelessness as a result of any emergency such as flood, fire or any other disaster; or
- c. Where any person who resides or who might reasonably be expected to reside with them, is vulnerable because of old age, mental illness, handicap or physical disability or other special reason; or
- d. Pregnant women, or a person who resides or might reasonably be expected to reside with a pregnant woman;
- e. All 16 and 17-year olds;
- f. 18-20-year old care leavers;
- g. Vulnerable care leavers;
- h. Vulnerable former members of the armed forces;
- i. Vulnerable former prisoners; and
- j. People who are vulnerable because they are fleeing violence.

Categories e-j were added by the *Homelessness (Priority Need for Accommodation (England) Order 2002* which came into force on 31 July 2002.

**If an applicant/household is in a priority need category and is homeless, the authority must secure temporary accommodation for them pending the outcome of inquiries.**

If a full rehousing duty is owed, suitable temporary accommodation must be provided until such time as the duty to rehouse is discharged. The *Localism Act 2011*<sup>5</sup> enables authorities (since 9 November 2012) to discharge their duty to homeless households by offering a suitable tenancy of private rented housing.

Local authorities have **discretion** to consider whether a homeless applicant/household has a local connection with the district. Most authorities do take local connection into account – where there is no local connection a referral can be made to an authority with which the applicant does have a local connection.

<sup>5</sup> *Localism Act 2011 (Commencement No.2 and Transitional Provisions) (England) Order 2012*



## 1.2 Homelessness strategies

The *Homelessness Act 2002* gave housing authorities:

- power to carry out reviews of homelessness in their areas;<sup>6</sup>
- a duty to formulate and publish a homelessness strategy based on these reviews;<sup>7</sup>
- keep the strategy under review; and
- consult other local or public authorities, or voluntary organisations before adopting or modifying the strategy.<sup>8</sup>

Guidance on conducting a review and formulation of a strategy is contained in chapter 2 of the [Homelessness Code of Guidance](#) (2018).

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<sup>6</sup> Section 1(1) of the 2002 Act

<sup>7</sup> Section 1(4) of the 2002 Act. All authorities have been required to publish a homelessness strategy since 1 April 2017.

<sup>8</sup> Section 3(8) of the 2002 Act

## 2. The causes of homelessness

Research into the causes of homelessness has identified several factors, some of which relate to the wider state of the economy and the housing market, and others which are personal to the individual or family.

**Structural factors** contributing to homelessness include:

- **A lack of housing supply** in England which is more acute in some areas than others. Homelessness is the most visible manifestation of the long-term failure of successive Governments to build enough housing to meet growing need. In the Housing White Paper (February 2017), the then Secretary of State for Communities and Local Government, Sajid Javid, said:

For decades, the pace of house building has been sluggish at best. As a result, the number of new homes has not kept pace with our growing population.<sup>9</sup>

- In addition to a crisis in overall housing supply, commentators argue that England is in the grip of **a crisis of affordability**. In the foreword to the June 2017 IPPR report, [What more can be done to build the homes we need?](#) Sir Michael Lyons said:

We would stress that it is not just the number built but also the balance of tenures and affordability which need to be thought through for an effective housing strategy.<sup>10</sup>

Research commissioned by the National Housing Federation (NHF) and Crisis from Heriot-Watt University (2018), identified a need for 340,000 homes each year to 2031 of which "145,000 must be affordable." Of the 145,000, the research concluded that 90,000 "should be for social rent."<sup>11</sup> **The social rented sector has declined as a proportion of all housing in recent years.** This reflects sales under the Right to Buy and reduced investment in the development of social housing. Shelter's evidence to the CLG Select Committee's inquiry into homelessness over 2015-16 argued for the development of 250,000 new homes a year of which 30% should be at a low rent.<sup>12</sup>

- **The affordability of home ownership** has been impacted by tighter mortgage regulation and the requirement for higher deposits from first-time buyers. Even in areas where house prices are relatively affordable, mortgage regulation can act as a barrier to access. Shelter published an analysis of [Housing affordability for first time buyers](#) in March 2015. This compared changes in affordability for first-time buyers between 1969 and 2013 and highlighted the fact that income was failing to keep pace with house price increases.<sup>13</sup>

<sup>9</sup> DCLG, [Fixing our Broken Housing Market](#), Cm 9352, February 2017, p7

<sup>10</sup> IPPR, [What more can be done to build the homes we need?](#), June 2017

<sup>11</sup> National Housing Federation (NHF) Press Release, [England short of 4 million homes](#), 18 May 2018

<sup>12</sup> [Shelter's written evidence submitted to the CLG Select Committee's 2016-17 inquiry into homelessness \(HOL94, paras 23-24\)](#)

<sup>13</sup> [Housing affordability for first time buyers](#). Shelter, March 2015, Summary

**Personal factors that trigger homelessness** include relationship breakdown; mental illness and addiction issues; discharge from prison; and leaving the care system.

The immediate causes of homelessness have remained fairly constant over the years. Family breakdown is highlighted as a significant cause. This includes family or friends no longer being able to provide accommodation and fleeing domestic abuse. The circumstances in which families become homeless tend to differ from those of single homeless individuals, with the latter experiencing more chaotic lifestyles.<sup>14</sup>

Section 3.2 of this briefing has more on the background of people applying to their local authority for homelessness assistance (pp22-24). and the support needs of people being helped by their local authority (p24).

There are two factors which merit particular consideration: homelessness arising from the end of an assured shorthold tenancy and the impact of Housing Benefit restrictions.

### **The end of an assured shorthold tenancy (AST)**

There has been a substantial increase in homelessness where the applicant's last settled home was an assured shorthold tenancy (AST). This is the standard type of tenancy used in the private rented sector (PRS). Briefly, section 21 of the *Housing Act 1988* enables private landlords to repossess properties let under an AST without having to establish fault on the part of the tenant.<sup>15</sup>

The trend can be seen in statistics on the reason for homelessness amongst households that were owed a duty to secure accommodation by their local authority. In 2010/11, the end of an AST was given as a reason in 15% of cases, rising to a peak of 31% in 2016/17. In 2017/18, the figure was 27%. Section 3.2 (p23) has further statistics.

In the [Homelessness monitor England 2018](#), an annual state-of-the-nation report commissioned by Crisis which looks at the impact of economic and policy developments on homelessness, the authors commented on the increase in applicants asking for assistance after having been evicted from an AST:

Most local authority survey participants attributed this trend to the growing displacement of low income tenants in pressured markets, reflecting their declining ability to compete with higher income groups due to progressively tightening Local Housing Allowance restrictions.<sup>16</sup>

The report notes that homelessness arising from mortgage arrears/repossessions remains at “historically low levels”; homelessness

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<sup>14</sup> DCLG, [Making every contact count: A joint approach to preventing homelessness](#), August 2012, paras 17-20

<sup>15</sup> This issue was the subject of a Westminster Hall debate on 6 December 2018, see: [The use of section 21 evictions in the private rented sector](#).

<sup>16</sup> Suzanne Fitzpatrick; Hal Pawson; Glen Bramley; Steve Wilcox; Beth Watts & Jenny Wood, [Homelessness monitor England 2018](#), April 2018 (Executive summary) p12.

triggered by evictions from the social rented sector are also “extremely low” – the authors conclude:

There can be little doubt, therefore, that homelessness is now far more closely associated with ejection from the private rented sector than either of the other two major tenures.<sup>17</sup>

Research conducted on behalf of the Residential Landlords Association (RLA) argues that section 21 is not a *cause* of homelessness. In [Homelessness and the Private Rented Sector \(November 2018\)](#), Dr Chris O’Leary et al suggest that landlords use section 21 where there *are* grounds for evicting tenants, such as rent arrears and anti-social behaviour. Section 21 simply provides a straightforward mechanism through which a landlord can be sure of recovering possession and which avoids the lengthy processes associated with section 8<sup>18</sup> – the report also points to evidence that in most cases tenants are responsible for ending ASTs:

Some in the sector assume that landlords use these provisions to end tenancies on a regular basis, though the costs involved, and evidence of risk-avoiding behaviour by landlords, data that suggest that ninety per cent of tenancies are ended by tenants, and increasing duration of tenancies, raises questions about this assumption. There is a significant gap in our knowledge around why landlords use Section 21 notices, a gap which our research has sought to address. But more research is needed on why Section 21 notices are used, and about the potential effect of making changes to this aspect of tenure security.<sup>19</sup>

The RLA has published several pieces of research to demonstrate that the rise in homelessness from the PRS is linked more closely to rent arrears caused by welfare reform, such as restrictions in the Local Housing Allowance and the roll-out of Universal Credit.<sup>20</sup>

Measures in the [Homelessness Reduction Act 2017](#) are aimed at addressing how local authorities’ deal with applications from tenants who have been served with a notice to leave an AST.<sup>21</sup>

## Housing Benefit restrictions

There is concern that reductions in the amount of Local Housing Allowance (LHA)<sup>22</sup> payable since April 2011 (and further Housing Benefit changes implemented in January 2012, April 2013 and April 2016) are having an adverse impact on levels of homelessness and the ability of local authorities to use private rented accommodation in order

The RLA disputes the charge that section 21 is a cause of homelessness.

<sup>17</sup> Ibid., p12

<sup>18</sup> The alternative means through which a notice for repossession of an AST can be served.

<sup>19</sup> RLA and Dr Chris O’Leary et al. [Homelessness and the Private Rented Sector](#), Residential Landlords Association, November 2018, p40

<sup>20</sup> See Simcock, T.J., (2017). [State Intervention into Renting: Making sense of the impact of policy changes](#). Manchester: UK. Residential Landlords Association, p.47; Simcock, T.J., (2018). [Investigating the effect of Welfare Reform on Private Renting](#). Manchester: UK. Residential Landlords Association; and Dr Chris O’Leary et al. [Homelessness and the Private Rented Sector](#), Residential Landlords Association, November 2018

<sup>21</sup> See Library paper, [Applying as homeless from an assured shorthold tenancy \(England\)](#) (6856)

<sup>22</sup> LHA is the benefit claimed by most PRS tenants to assist with rent payments.

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to discharge their duties to homeless households.<sup>23</sup> London Councils published [Tracking Welfare Reform: Meeting the financial challenge](#) (September 2013) in which it highlighted an increased risk of arrears and homelessness as a potential outcome of the Government's various Housing Benefit measures at that time.

The 2015 Government implemented additional welfare reforms:

- the Benefit Cap was reduced from £26,000 to £23,000 in London and £20,000 elsewhere from 7 November 2016 (measures were included in the *Welfare Reform and Work Act 2016*),
- From April 2017, young people aged 18 to 21 who claimed Universal Credit were not entitled to the housing costs element, with certain exemptions. Entitlement was reinstated with effect from 31 December 2018.<sup>24</sup>
- Local Housing Allowance rates have been frozen for four years from 2016 with some provision for rents in the most expensive areas. This means that claimants' LHA entitlement is less likely to cover the full contractual rent due as real rents increase over time.
- *The Housing Benefit (Abolition of the Family Premium and limiting backdating) (Amendment) Regulations 2015* (SI 2015/1857) abolished the family premium for all new Housing Benefit entitlements after 30 April 2016 and for those who cease to have responsibility for any children or young people after 30 April 2016.
- Support for families receiving tax credits is now limited to two children. An equivalent change has been made to Housing Benefit "to ensure consistency between both benefits." This applies to subsequent children born after April 2017.

The Department's statistical release of 23 March 2017, covering the third quarter of 2016/17, acknowledged affordability issues in the private rented sector:

This indicates that affordability is an increasingly significant issue, as more households facing the end of a private tenancy are unable to find an alternative without assistance. The increase in the end of tenancies is also related to the expansion of the private rented sector, which has doubled in size (since 2002) and now houses 4.5 million households (2015/16).<sup>25</sup>

The National Audit Office's (NAO) September 2017 report, [Homelessness](#), identified Housing Benefit changes as contributing to an increase in homelessness:

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<sup>23</sup> For more information on the Housing Benefit changes since 2010 see Library briefing paper 5638.

<sup>24</sup> For more information see Library briefing paper 6473: [Housing cost element of Universal Credit: withdrawing entitlement from 18-21-year olds](#)

<sup>25</sup> DCLG Statistical Release, 23 March 2017, [Statutory homelessness and homelessness prevention and relief: October to December 2016](#)



Changes to Local Housing Allowance are likely to have contributed to the affordability of tenancies for those on benefits, and are an element of the increase in homelessness. Since 2011, the Department for Work & Pensions has introduced a series of welfare reforms, including capping and freezing Local Housing Allowance. These reforms have been designed to reduce overall welfare spending and to provide incentives for benefit recipients to take up employment. They have reduced the amount of household income that it is possible to derive from benefits where the Local Housing Allowance applies. At the same time, rents in the private rented sector in much of the country — London in particular — have increased faster than wage growth. All of these factors appear to have contributed to private rented properties becoming less affordable, which in turn is likely to be contributing to homelessness caused by the ending of an assured shorthold tenancy.

[...]

The government has not fully assessed the impact of its welfare reforms on homelessness. In our 2012 report *Managing the impact of Housing Benefit reform*, we found that the Department for Work & Pensions' assessment of the impact of its housing benefit reforms did not reflect their potential full scale, including an increase in homelessness. Subsequent research commissioned by the Department for Work & Pensions in 2012 on the impact of housing benefit reforms on homelessness did not establish how many of these households would have been homeless if the reforms had not been introduced. The Department for Work & Pensions has not carried out any more recent analysis, despite the introduction of a series of further welfare reforms since late 2012.<sup>26</sup>

[The Homelessness monitor England 2018](#) focused on continued LHA restrictions and Universal Credit's impact on homelessness. The report identifies a fall in the number of claimants living in the private rented sector since February 2014 despite strong growth in the size of this sector over the period. A sharp drop in claimant numbers in inner London is identified, which illustrates the difficulties low income households face in obtaining and maintaining a private sector tenancy in higher value areas.<sup>27</sup>

## Government commissioned research

On 14 January 2019, the Minister, Heather Wheeler, responded to a PQ on whether the Department would commission research into the causes of homelessness:

Following a recommendation by the Public Accounts Committee the Ministry for Housing Communities and Local Government and the Department for Work and Pensions jointly commissioned a feasibility study into researching the wider causes of homelessness, including households' experience of the welfare system as well as other factors such as housing affordability or relationship breakdown.

The feasibility study was completed by an independent supplier, Alma and comprised of three strands:

<sup>26</sup> NAO, [HC 308](#), September 2017, paras 11 & 13

<sup>27</sup> Crisis, [The Homelessness Monitor 2018](#), April 2018, p34

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- a rapid evidence assessment on the causes of homelessness in the UK
- a critique of existing models of homelessness and homelessness projections; and
- identification of options for developing a predictive, quantitative model or suite of models on homelessness.

The Communities Secretary and I are working with the ministerial teams across the DWP to decide how best to take this work forward. We will write to the Public Account Accounts Committee shortly setting out our plans for next steps.<sup>28</sup>

## 3. Statistics on statutory homelessness

### Summary

- MHCLG introduced a new system for collecting homelessness statistics in April 2018. The figures are classed as 'experimental' because of quality issues.
- 90% of initial decisions made on applicants found that a duty was owed: 33,330 households were owed a prevention duty and 25,330 were owed a relief duty.
- About 61% of prevention and relief duties ended resulted in the local authority securing accommodation for 6+ months.
- Homelessness due to the end of an assured shorthold tenancy in the private sector has been rising, and now accounts for 24% of households owed an initial duty.
- The number of households in temporary accommodation in June 2018 was 4.8% higher than a year previously.
- Official statistics only cover households that apply and are eligible for help. An alternative estimate put the number of homeless households in England at 103,000 in 2016.

MHCLG publishes quarterly statistics on local authorities' activity under the HRA – the figures include decisions made on applicant households, and how local authorities have discharged their duties. The statistical release published in December 2018 covers April-June 2018, and is the first in a new style of releases.

### 3.1 Changes to homelessness statistics

Official homelessness statistics have been affected both by the implementation of the *Homelessness Reduction Act 2017* (HRA) and the introduction of a new system for local authorities to report homelessness figures.

Previously, MHCLG published a quarterly release detailing numbers of households owed a main homelessness duty, numbers in temporary accommodation and prevention and relief activity by local authorities.<sup>29</sup> The release for January-March 2018 (published in June 2018) was the last in this series.

The HRA came into force on the 3 April 2018, giving local authorities additional statutory duties to work to prevent and relieve homelessness for all eligible applicants (section 1 explains these duties in more detail). This has necessitated a change in how homelessness statistics are reported.

At the same time, MHCLG introduced a new statistics reporting system. Since April 2018, local authorities have started to submit case-level homelessness data to MHCLG via a system called H-CLIC. A [June 2018 note from MHCLG](#) sets out planned changes to the reporting system and its impact on the published statistics. H-CLIC is intended to provide information about individual people in each household (until now, only

<sup>29</sup> Before the HRA came into force, prevention and relief activity was not a statutory duty but was nevertheless carried out by most local authorities

household-level data has been available) as well as more detailed information about the background of applicants and their support needs.<sup>30</sup>

MHCLG's first statistics release using H-CLIC data was published in December 2018 and covers the period from April to June 2018. Section 3.2 below describes the statistics in detail.

An [article from researchers at the University of Nottingham](#), published online at *The Conversation*, suggests that there are issues with how local authorities are using H-CLIC to report data:

The new homelessness figures for April to June 2018 are the first aggregated reports based on [H-CLIC]. Entire local authorities have failed to return data for this period. For many others their returns are incomplete or contain errors because they haven't yet got to grips with the new system. The new statistics are likely to under-represent how many people were homeless in this period.

<sup>31</sup>

The article reports that local authorities have raised concerns about "confusion over what information should be recorded" and that the transition "will make monitoring the impact of the Homelessness Reduction Act 2017 impossible".<sup>32</sup>

The latest release is classed as Experimental Statistics. Experimental Statistics are defined by the Office for National Statistics as statistics that are not yet fully developed, and which come with limitations which should be explained in the information accompanying each release.<sup>33</sup> In this case, MHCLG have said that:

Every effort has been made to ensure the data in this publication is of suitable quality. However, in some instances there are omissions in data at the local authority level which may affect the England totals.<sup>34</sup>

Relevant quality issues are explained alongside the data in this briefing. MHCLG have previously said that it expects the release to be classed as Experimental Statistics for around a year.<sup>35</sup>

### 3.2 Official statistics

This section summarises MHCLG's first release of new Experimental Statistics on homelessness.

#### Experimental statistics

There are a number of data quality issues which mean that all figures should be interpreted with caution, explained below. Between four and six local authorities did not submit data in each category. This means that all totals are underestimates unless stated otherwise.

<sup>30</sup> MHCLG, [Changes to MHCLG's statutory homelessness statistics](#), 27 June 2018

<sup>31</sup> Munro, N. & Reeson, C., [Homelessness: why new statistics are probably underestimating the problem](#), *The Conversation*, 17 December 2018

<sup>32</sup> Ibid.

Office for National Statistics, [Guide to experimental statistics](#), accessed 3 July 2018

<sup>34</sup> MHCLG, [Statutory homelessness. April to June 2018: England](#), 13 December 2018

<sup>35</sup> MHCLG, [Changes to MHCLG's statutory homelessness statistics](#), 27 June 2018

## Prevention and relief duties

Local authorities have a duty to prevent homelessness for applicants who are threatened with homelessness within 56 days, and a duty to relieve homelessness for applicants who are homeless (see section 1).

The H-CLIC system requires local authorities to record the outcome of their initial decision on homelessness applicants – whether they were owed a prevention or relief duty, or deemed to be not homeless or threatened with homelessness within 56 days.

If the applicant household is unintentionally homeless and in a priority need category, the local authority also has a duty to secure suitable accommodation for the household (often referred to as a ‘main duty’). The H-CLIC system does not record the ‘main duty’ decision until after the duties determined at initial decision have elapsed (i.e. after 56 days).

The table below shows the outcome of **initial decisions** made by local authorities in April to June 2018. A total of 64,690 were recorded, of which 90% found that a homelessness duty was owed: 33,330 prevention duties and 25,330 relief duties.

INITIAL DECISIONS ON APPLICANTS FOR HOMELESSNESS ASSISTANCE		
England, April - June 2018		
Decision	Number of households	% of all decisions
Homelessness duty owed	58,660	
Prevention duty	33,330	51%
Relief duty	25,330	39%
Neither duty owed	6,300	10%
<b>Total decisions</b>	<b>64,960</b>	

Notes: Figures are rounded to the nearest 10. These figures are an underestimate because they exclude six local authorities that didn't provide data. Other data quality issues are explained below.

Source: MHCLG, [Initial decision tables: Table A1](#) (13 December 2018)

MHCLG have reported quality issues with these figures. Six out of 326 local authorities did not provide initial assessment data, so the figures underestimate the England total (by around 4%, MHCLG estimate). Several local authorities were also incorrect in how they logged whether a duty was owed, including logging as ‘duty owed’ households that were ineligible for any duty. Information about eligibility is not included in this release because of concerns about accuracy, but this data should not include ineligible applicants.<sup>36</sup>

The table overleaf shows the number of prevention and relief **duties ended** between April and June 2018. The number of duties ended was lower than the number of initial decisions made, but this is not surprising for the first quarter of data – households accepted towards

<sup>36</sup> MHCLG, [Statutory homelessness. April to June 2018: England](#), 13 December 2018



## 19 Statutory Homelessness in England

the end of the quarter might not have the duty ended until the next quarter.

A total of 10,540 prevention duties were reported as ended, of which 6,700 (64%) were ended by securing accommodation for at least six months. A further 20% of duties ended with the applicant becoming homeless (effectively turning the duty into a relief duty).

7,230 relief duties were reported as ended, of which, 4,100 (57%) were ended by securing accommodation for at least six months. A further 17% of duties were ended because 56 days had passed – at this point, the local authority can end its duty if it has taken reasonable steps to secure accommodation, although the 'main duty' to households that are unintentionally homeless and in priority need still applies.

HOW WERE PREVENTION AND RELIEF DUTIES ENDED? England, April - June 2018		
	Number of households	% of duties ended
<b>Prevention duties ended</b>	<b>10,540</b>	<b>100%</b>
Secured accommodation for 6+ months	6,700	64%
Homeless (including intentionally) <sup>a</sup>	2,160	20%
Refused <sup>b</sup>	110	1%
Other <sup>c</sup>	1,570	15%
<b>Relief duties ended</b>	<b>7,230</b>	<b>100%</b>
Secured accommodation for 6+ months	4,100	57%
56 days elapsed <sup>d</sup>	1,240	17%
Local connection referral	150	2%
Refused <sup>b</sup>	130	2%
Other <sup>c</sup>	1,610	22%
<b>Total duties ended</b>	<b>17,770</b>	<b>100%</b>
Total secured accommodation for 6+ months	10,800	61%

Notes: Figures are rounded to the nearest 10. These figures are an underestimate because they exclude six local authorities that didn't provide data. Other data quality issues are explained above.

<sup>a</sup> If an applicant becomes homeless while the prevention duty applies, the prevention duty ends and a relief duty starts.

<sup>b</sup> Total of 'refusal to co-operate' and 'refused suitable accommodation'

<sup>c</sup> Includes contact lost, application withdrawn, and applicant deceased

<sup>d</sup> The local authority can end its relief duty after 56 days as long as it has taken reasonable steps to help secure accommodation. If the applicant is unintentionally homeless and in priority need, the 'main duty' to secure accommodation will still apply.

Source: MHCLG, [Prevention duty tables: Table P1 and Relief duty tables: Table R1](#) (13 December 2018)

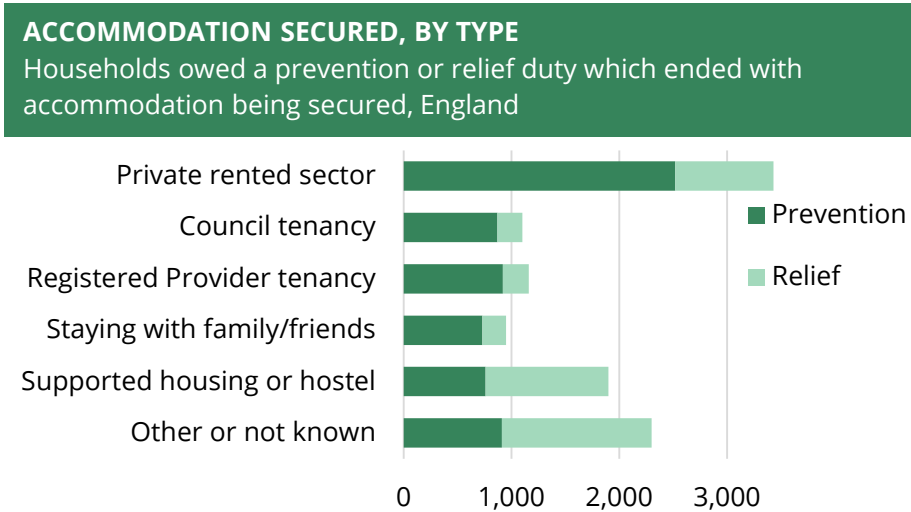
Again, these figures exclude six out of 326 local authorities and are therefore an underestimate of the total for England. Local authorities have also reported software issues that may also have contributed to an

underestimate. Additionally, a number of local authorities reported prevention and relief activities where these were not the relevant duties owed.<sup>37</sup>

MHCLG also publishes data on how local authorities secured accommodation, in cases where this happened. Of the 6,700 households secured accommodation under a prevention duty, 24% had accommodation secured by the local authority and 23% found their own accommodation with help from the local authority to secure it. In around 15% of cases, the local authority worked to secure a return to friends or family, or prevent eviction or repossession.<sup>38</sup>

Of the 4,100 households who had accommodation secured under a relief duty, 34% had accommodation secured by the local authority and 30% had supported housing provided. A further 19% were helped to secure accommodation that they had found themselves.<sup>39</sup>

The chart below shows the type of accommodation secured in these cases. Overall, the private rented sector was the most common option, accounting for 31% of all duties ended. The bulk of households accommodated in the private rented sector arrived following a prevention duty, and this pattern also held for social tenancies and staying with family/friends. By contrast, supported housing and hostels were more commonly used for ending a relief duty.



Notes: Figures are rounded to the nearest 10. These figures are an underestimate because they exclude six local authorities that didn't provide data. Other data quality issues are explained above.

Source: MHCLG, [Prevention duty tables: Table P2](#) and [Relief duty tables: Table R2](#) (13 December 2018)

## Main duty decisions

Local authorities have an absolute duty to secure accommodation for households who are unintentionally homeless and in priority need, as

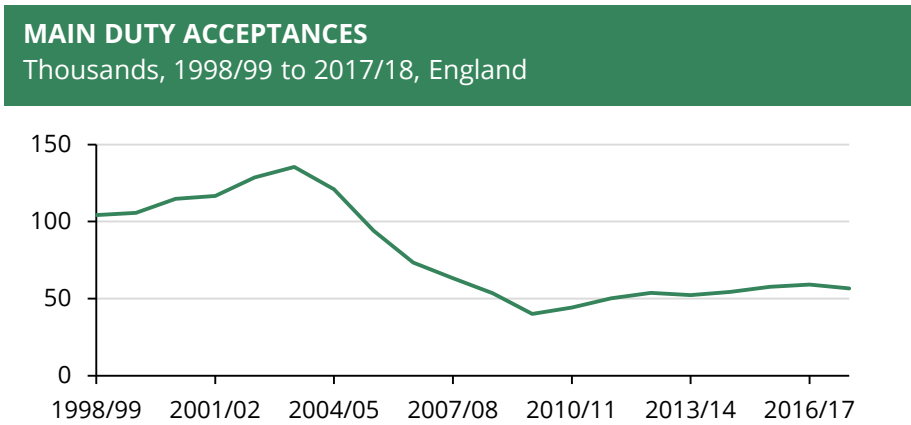
<sup>37</sup> MHCLG, [Statutory homelessness. April to June 2018: England](#), 13 December 2018

<sup>38</sup> MHCLG, [Prevention duty tables: Table P3](#) (13 December 2018)

<sup>39</sup> MHCLG, [Relief duty tables: Table R3](#) (13 December 2018)

set out in the *Housing Act 1996* (see section 1). This is sometimes referred to as a ‘main duty’.

The chart overleaf shows long-term trends in decisions taken and households accepted as owed a main duty up to 2017/18 – that is, until just before the HRA took effect and introduced additional duties. Acceptances were at their highest in 2003/04, before falling and reaching a low point in 2009/10. During the 2010s, acceptances generally rose – increasing from 40,020 in 2009/10 to 56,580 in 2017/18, a rise of 41%.



Source: MHCLG, [Main duty tables: Table MD1](#) (13 December 2018)

Main duty acceptances have in the past been used as an indicator of the extent of homelessness, but it has long been accepted that this doesn’t provide a full picture. In 2017/18, only 52% of households applying to their local authority were accepted as being owed a main duty – the remainder were found to be either not in priority need (17%), in priority need but intentionally homeless (8%) or did not meet the criteria for homelessness (23%).<sup>40</sup> Prior to the HRA, local authorities were also carrying out prevention and relief activity outside of the statutory homelessness framework. Section 3.3 considers other estimates of the true extent of homelessness.

The latest release from MHCLG also reports on main duty acceptances. The figures for April-June 2018 are not fully comparable with figures from before April 2018, because of the additional statutory duties created by the HRA. Households are now initially assessed as being owed either a prevention or a relief duty – the relief duty applies for 56 days, and is replaced with a main duty if the household meets the criteria and hasn’t been relieved within 56 days. The H-CLIC system logs households as being owed a main duty only after this 56-day period has elapsed.

The number of households recorded as being owed a main duty in April-June 2018 is therefore considerably lower than the number in the same quarter in previous years (see chart overleaf). 6,670 households were accepted, of which a small minority (560) applied after the HRA

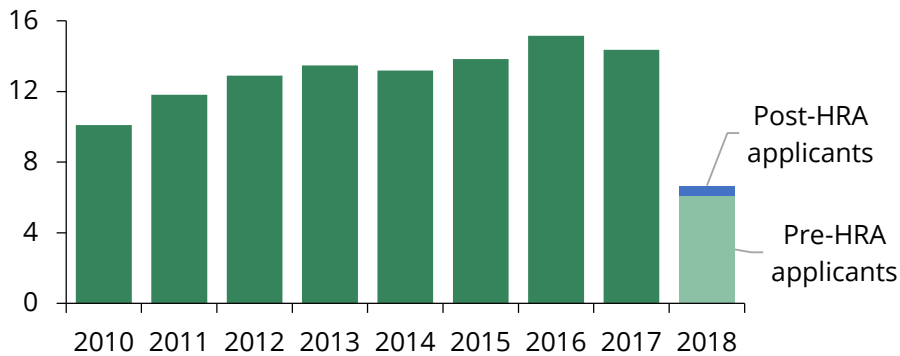
<sup>40</sup> MHCLG, [Main duty tables: Table MD1](#) (13 December 2018)

came into force on April 3<sup>rd</sup>. The remainder applied before April 3<sup>rd</sup> but didn't have a decision made until that quarter.

The number of main duty acceptances in April-June 2018 is 58% lower than the number in the same quarter in 2017. There are several factors behind this drop. The 56-day delay in recording main duty decisions means that many households who approached their local authority in the April-June period won't have their main duty decision recorded until the next quarter. Prevention and relief activities will also have successfully resolved households' issues in some cases, removing the need for a main duty assessment.

Data quality issues are also likely to have contributed. Four local authorities did not provide a return, so the total is an underestimate. MHCLG also reports that not all local authorities were able to distinguish between pre- and post-HRA cases, and in these instances cases were reported in the pre-HRA category.<sup>41</sup>

**MAIN DUTY ACCEPTANCES BETWEEN APRIL AND JUNE**  
Thousands, 2010-2018, England



Notes: Figures are rounded to the nearest 10. These figures are an underestimate because they exclude four local authorities that didn't provide data. Other data quality issues are explained above.

Source: MHCLG, [Main duty tables: Table MD1](#) (13 December 2018)

**Historic statistics: data download**

Historic statistics covering the period up to April 2018 are available for download from the [landing page of this briefing paper](#). This includes data on outcomes of 'main duty' decisions made and the background of those accepted as owed a main duty.

**Background of people applying as homeless**

MHCLG's data includes information on the background of households accepted as being owed a prevention or a relief duty.

The table below shows the reason recorded for households losing their last settled home. The figures suggest that of the 58,660 households accepted as being owed a prevention or relief duty, 30% became homeless due to loss of rented accommodation (or accommodation tied to a job). The majority of these cases lost their accommodation due to

<sup>41</sup> MHCLG, [Main duty tables: Table MD1](#) (13 December 2018)

the end of an assured shorthold tenancy (AST), the most common form of tenancy in the PRS.

Other common reasons were family and friends no longer able or willing to accommodate the household (22%) and relationship breakdown (15%). Just over half of relationship breakdown cases involved violence.

Similar data quality issues apply to this data as to the rest of the initial decisions statistics (see 'prevention and relief duties', above).

REASONS FOR LOSS OF LAST SETTLED HOME		
Households owed a prevention or relief duty, April-June 2018, England		
	Number of households	% of total
Family/friends no longer able to accommodate	13,090	22%
Relationship breakdown	8,670	15%
<i>Non-violent</i>	4,130	7%
<i>Violent</i>	4,540	8%
Loss of rented or tied accommodation	17,540	30%
<i>Due to termination of an AST</i>	14,150	24%
<i>Due to other reasons</i>	3,390	6%
Other	19,360	33%
<b>Total</b>	<b>58,660</b>	<b>100%</b>

Notes: Figures are rounded to the nearest 10. These figures are an underestimate because they exclude six local authorities that didn't provide data. Other data quality issues are explained above.

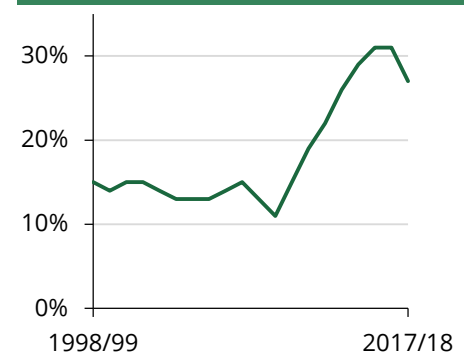
Source: MHCLG, [Initial decision tables: Table A2](#) (13 December 2018)

Loss of accommodation due to an AST grew substantially from 2009/10 onwards, accounting for much of the overall growth in statutory homelessness in this period. The chart, right, shows the trend in the proportion of households owed a main duty prior to the HRA that became homeless for this reason. There was a rise from 11% of all cases in 2009/10 to a peak of 31% in 2015/16, before falling to 27% in 2017/18.

Section 2 of this briefing has more on the factors driving homelessness.

The chart below shows a breakdown of the type of accommodation households were living in at the time of applying. 33% of accepted households were living with family or friends and 30% were renting in the private sector. While 11% of households were recorded as 'no fixed abode', MHCLG report some uncertainty amongst local authorities about whether 'living with family/friends' would be a more appropriate category for some cases.

**HOUSEHOLDS HOMELESS DUE TO END OF AN AST**  
% of main duty acceptances, England

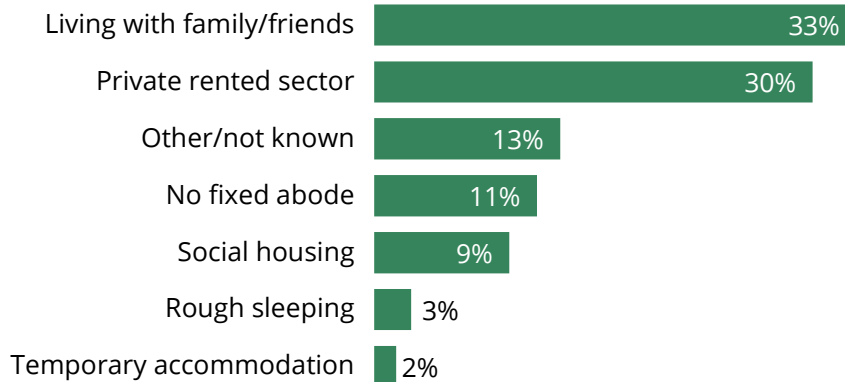


Source: MHCLG, [Live Table 774](#)



**TYPE OF ACCOMMODATION AT TIME OF APPLICATION**

Households owed a prevention or relief duty, April-June 2018, England



Notes: These figures exclude six local authorities that didn't provide data. Other data quality issues are explained above.

Source: MHCLG, [Initial decision tables: Table A4](#) (13 December 2018)

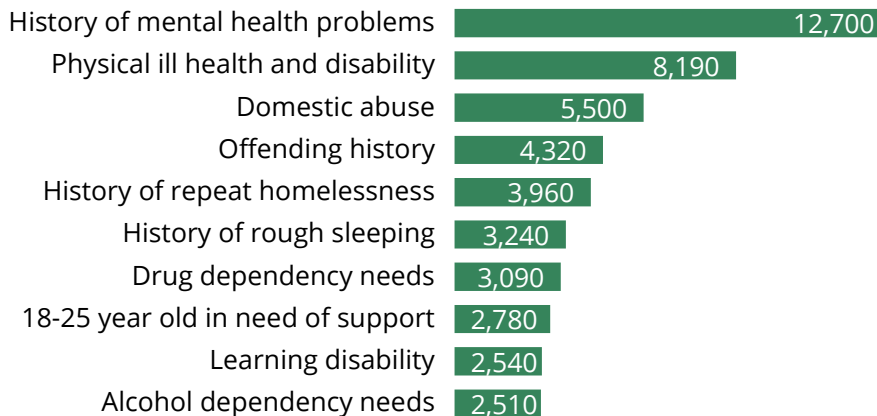
The HRA means that households which are owed a prevention or relief duty are entitled to a personalised housing plan. The local authority must assess the support needs of these households as part of that process.

In April-June 2018, 27,850 households were identified as having support needs – 47% of all households assessed as owed a prevention or relief duty. Because households can have more than one support need, there were 40,110 support needs identified: an average of 1.5 per household.

The chart below shows the ten most commonly-reported support needs. 'History of mental health problems' was the most common, followed by 'physical ill-health and disability' and 'domestic abuse'.

**TEN MOST COMMONLY-RECORDED SUPPORT NEEDS**

April - June 2018, England



Notes: Figures are rounded to the nearest ten. These figures exclude six local authorities that didn't provide data. Other data quality issues are explained above.

Source: MHCLG, [Initial decision tables: Table A3](#) (13 December 2018)

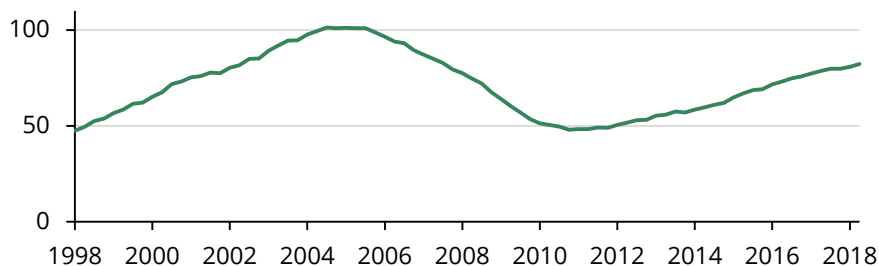
## Households in temporary accommodation

Local authorities may provide temporary accommodation for households in a number of circumstances – these include while the household is waiting for a decision on part of their application to be reached, or waiting to be rehoused as part of a main duty.

There were a total of 82,310 households in temporary accommodation at the end of June 2018, 4.8% higher than the same date a year previously. These households included a total of 123,630, 2.5% higher than a year previously. As the chart below shows, the number of households in temporary accommodation has been rising year-on-year since late 2011.

Even though data on temporary accommodation was reported differently through H-CLIC, the total is broadly comparable with data from previous quarters. However, the total for June 2018 is based on imputed data (i.e. estimates based on previous trends) for 27 local authorities which were unable to provide complete data. MHCLG also reports some inconsistencies in reporting between local authorities, and advises the data be treated with caution.

**HOUSEHOLDS IN TEMPORARY ACCOMMODATION**  
Thousands, at end of quarter, March 1998 to June 2018



Notes: Figures are rounded to the nearest ten. These figures exclude six local authorities that didn't provide data. Other data quality issues are explained above.

Source: MHCLG, [Initial decision tables: Table TA1](#) (13 December 2018)

## 3.3 Other estimates of homelessness

Organisations such as Shelter and Crisis have long argued that the official statistics do not give a full picture of homelessness in England. The figures exclude those who are homeless but do not approach a local authority for assistance and those who do not meet the statutory criteria.

For example, Crisis carried out research with Heriot-Watt University to define 'core homelessness' and make estimates of its extent based on available data. This research estimated that there were approximately 103,000 homeless households in England in 2016. This total was made up of an estimated 59,000 households 'sofa surfing'; 38,500 in hostels, refuges and night shelters; 17,000 in unsuitable temporary accommodation; 11,500 squatting or in non-residential

accommodation; 8,000 rough sleepers and 8,000 sleeping in tents, cars or on public transport.<sup>42</sup>

## 4. How are local authorities performing?

### 4.1 Meeting their homelessness duties

Several studies have identified variations in the quality of local authority homelessness services and funding pressures on those services.

Recurrent themes have included:

- poor coordination and collaboration with other agencies, e.g. health services and social services;
- a lack of rigorous investigation by local authorities with some applicants turned away without receiving a full assessment, leading to charges of gate-keeping;
- inconsistent assessment of vulnerability and intentionality; and
- pressure on local authority resources in terms of staffing and costs, particularly the cost of temporary accommodation.

The independent panel of experts established by Crisis in 2015 identified issues with the standard of advice and assistance given to non-priority applicants. Crisis conducted a mystery shopping exercise in 2014 to test the standard of advice and assistance given to single homeless people. **The evidence gathered led Crisis to conclude that in a majority of cases (50 of 87), applicants received inadequate or insufficient help.** A significant number of mystery shoppers had no assessment carried out and were not able to make a homeless application.<sup>43</sup>

These findings are reinforced by data gathered using the Combined Homelessness and Information Network (CHAIN) in London. Over 2017/18, 730 people seen rough sleeping for the first time were recorded as having approached their local authority Housing Options service for help in the 12 months prior to first being seen rough sleeping. This represents almost 30% of all new rough sleepers in the year.

The move to a Housing Options approach by local authorities has been generally welcomed as generating positive outcomes in terms of prevention work, but concerns have arisen around its use to reduce the number of homeless acceptances amongst households in priority need. The CLG Select Committee identified evidence of difficulties applicants can face in trying to trigger the local authority's statutory duties:

Around 30% of new rough sleepers seen in 2017/18 in London had contacted a local authority for assistance before sleeping rough.

<sup>42</sup> Bramley, G. for Crisis. [Homelessness projections: Core homelessness in Great Britain](#), August 2017

<sup>43</sup> [The Homelessness legislation: an independent review of the legal duties owed to homeless people](#), April 2016, p14

The problem is typically [local authorities] not just making an application difficult, but an attempt to filter people away from getting a homeless application made, let alone accepted. That has unfortunately been, in part, the role of what some local authorities have been calling their housing options routes ... Typically we find people saying that you have to go through the housing options route for 14 days or 28 days before they will take a homeless application. If someone is at risk of homelessness, that application has to be made when they present, otherwise it is gatekeeping.<sup>44</sup>

The Local Government Ombudsman has periodically voiced concern about the number of complaints received where councils were employing “gatekeeping” practices in relation to homeless applications.<sup>45</sup>

The *Homelessness Reduction Act 2017* has strengthened the duties on local authorities in relation to their role in preventing homelessness (see section 1.1). The requirement to work to prevent/relieve homelessness for all eligible applicants should mean that no one who is homeless or threatened with homelessness (and eligible) is turned away without advice and assistance and a personal housing plan. As the new provisions have been in force for less than a year, it is rather too early to assess the impact on local authorities’ performance. However, the Act is largely based on provisions that were introduced in Wales by the *Housing Act (Wales) 2014* with effect from April 2015. A [Post-implementation Review](#) published in July 2018 found many positive outcomes but records:

...significant variation across Wales and also within local authority areas regarding the extent to which the ethos of the new Act has been adopted and the effectiveness of prevention and reasonable steps: this is a concern.<sup>46</sup>

### 4.2 Use of private rented & out of borough placements

Measures to enable local authorities to discharge their duty towards statutorily homeless households by offering a tenancy in the private rented sector are contained in the *Localism Act 2011*. Regulations implementing this measure came into force on 9 November 2012.<sup>47</sup> There is concern amongst certain housing organisations that it is inappropriate for authorities to discharge their duty towards homeless households by offering a private rented sector tenancy at a time when homeless applications arising from evictions in the sector have risen.<sup>48</sup> Concerns were raised as the *Localism Bill* progressed through Parliament about the standard of accommodation in the private rented sector. The

The Localism Act 2011 enabled local authorities to discharge their responsibilities to homeless household by using private rented accommodation.

<sup>44</sup> [CLG Select Committee. Third Report of 2016-17, Homelessness, HC 40](#), August 2016, para 40

<sup>45</sup> See: *Inside Housing*, “Councils failing to accept the homeless”, 25 February 2011 and [LGO decision, Eastbourne Borough Council \(14016569\)](#), 2016

<sup>46</sup> [Social Research Number 46/2018](#), Post-implementation evaluation of Part 2 of the Housing Act (Wales) 2014: Final Report, Welsh Government, 19 July 2018

<sup>47</sup> *Localism Act 2011 (Commencement No.2 and Transitional Provisions) (England) Order 2012*, (S.I. 2012/2599)

<sup>48</sup> See section 2 of this paper.

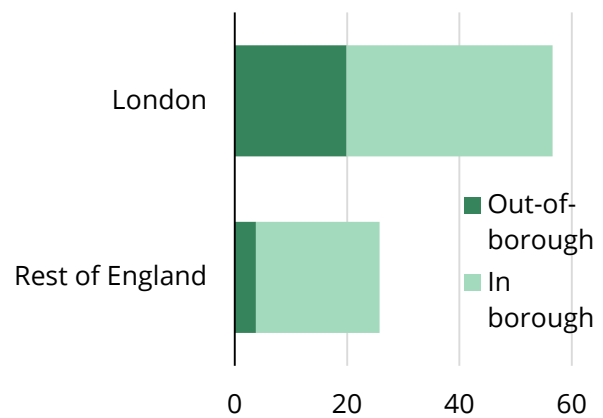
Government said it would use order-making powers (under section 210 of the *Housing Act 1996*) to specify required property standards and standards of management that will apply where a homeless household is re-housed in private rented housing.

Following a consultation exercise the [Homelessness \(Suitability of Accommodation\) \(England\) Order 2012](#) was brought into force on 9 November 2012. [Statutory guidance on the Order](#) was published to which local authorities had to have regard when discharging (ending) their duties to homeless households by using private rented accommodation.<sup>49</sup> The statutory guidance on the *Homelessness (Suitability of Accommodation) (England) Order 2012* states that location of accommodation is relevant to the question of suitability and describes the factors that an authority must take into account when offering accommodation outside of the local area.

Local authorities, particularly in London, also use temporary accommodation in other areas to assist in fulfilling their statutory homeless duties. Authorities receiving placements from London boroughs complain that they are not informed about the presence of vulnerable families within their areas.<sup>50</sup>

The chart, right, shows the number of households in out-of-borough and in-borough temporary accommodation at the end of June 2018. **23,640 households were placed in another local authority area at the end of June 2018, 6.7% higher than a year previously.** 19,890 households were placed by a London local authority (84% of the total). Out-of-borough placements are more common for London local authorities: 35% of households placed in temporary accommodation by a London local authority were placed out-of-borough, compared with 15% in the rest of England.

**IN- AND OUT-OF-BOROUGH PLACEMENTS**  
Thousands of households, end of June 2018



Source: MHCLG, [Live Table TA1](#)

Section 208(1) of the 1996 Act requires that authorities shall, in discharging their housing functions under Part 7, in so far as is reasonably practicable, secure accommodation within the authority's own district. Chapter 17 of the [Homelessness Code of Guidance 2018](#) (para 17.46 onwards) provides statutory guidance for local authorities when considering the suitability of accommodation in terms of its location.

The Homelessness Minister, Heather Wheeler, provided the following response to a question about out-of-borough placements on 5 November 2018:

<sup>49</sup> This guidance is now archived - the relevant guidance can be found in chapter 17 of the [Homelessness Code of Guidance 2018](#).

<sup>50</sup> *Inside Housing*, "[Councils left in dark over homeless placements](#)," 15 November 2013

We have been clear that placing families out of borough should be a last resort, and we have now committed £40 million to a London collaborative project that will ensure that families are placed in temporary accommodation close to home. We also recently launched the £20 million private rented sector access fund to support those who are homeless, or who are at risk of becoming homeless, to access sustainable accommodation. Finally, our specialist homelessness advisers are working closely with London boroughs in particular to provide support to limit the number of out-of-borough moves altogether.<sup>51</sup>

### 4.3 Homeless young people

Numerous reports have identified particular issues that young people face when seeking to access local authority assistance due to homelessness. Research published by the Law Centres Network in February 2013 concluded that local authority protocols for dealing with homeless 16 and 17 year olds did not comply with the law, resulting in homeless young people failing to receive the support to which they are entitled.<sup>52</sup> These findings were reinforced by the Children's Society's report [Getting the house in order](#) (March 2015).<sup>53</sup>

Centrepoint's report, [Making homeless young people count: The scale of youth homelessness in the UK](#) (November 2018) found that in 2017/18:

Of those young people who approached their council for help, less than half (48 per cent) received meaningful support to help prevent or relieve their homelessness (including those receiving a full housing duty). This is an increase from 42 per cent in 2016/17, driven by an increase in the prevention and relief provision for those who were not accepted as statutorily homeless.<sup>54</sup>

In this report Centrepoint defines a young person as someone aged 16 to 24.

The report identifies that the Homelessness Reduction Act should result in authorities assessing the needs of all young people who present for assistance:

This means that there will be a steep rise in the number of young people assessed. The Ministry for Housing, Communities and Local Government (MHCLG) estimates that each assessment takes two hours, so additional resource provisions will be essential. In 2017/8, the 12 months before the introduction of the Homelessness Reduction Act, only 1 in 6 councils (16 per cent) were already assessing everyone who presented to them.<sup>55</sup>

Centrepoint is calling for adequate funding of authorities' new duties and for specific data to be gathered on youth homelessness:

Funding has been assigned for new burdens associated with the Homelessness Reduction Act only until April 2020. Centrepoint's research shows that the current funding is not adequate to

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<sup>51</sup> [HC Deb 5 November 2018 cc1212-3](#)

<sup>52</sup> Law Centres Network, [Supporting homeless 16 and 17 year olds](#), February 2013

<sup>53</sup> Children's Society, [Getting the house in order](#), March 2015

<sup>54</sup> Centrepoint, [Making homeless young people count: The scale of youth homelessness in the UK](#), November 2018, p4

<sup>55</sup> *Ibid.*, p13

support councils with their increased duties. Central government must consider additional funding as a priority, based on their review of the Homelessness Reduction Act. Without this, the Homelessness Reduction Act will not achieve its aim of supporting all people in need.

Further, it is essential that funding does not end in 2020, and that future allocations are based on need rather than existing levels of support in local areas. A thorough funding review based on needs would ensure councils have the security to plan services in the longer term.

[...]

Data published should include specific data on youth homelessness to ensure that the needs of this group can be effectively addressed.<sup>56</sup>

In April 2018, MHCLG and the Department for Education published updated joint guidance on the [Prevention of homelessness and provision of accommodation for 16 and 17 year old young people who may be homeless and/or require accommodation](#). The guidance takes account of new duties under the *Homelessness Reduction Act 2017*.

## 5. Government policy & comment

Heather Wheeler is the Minister for Housing and Homelessness at the MHCLG. She leads a cross-government Homelessness Reduction Taskforce which is supported by a panel of experts, the aim of which is to “drive forward a new strategy to reduce homelessness with an initial focus on rough sleeping.”

### 5.1 Increasing housing supply

One of the key ways in which the Government is seeking to tackle and prevent homelessness is to stimulate housing supply. The target is to “support the delivery of a million homes by the end of 2020 and half a million more by the end of 2022 and put us on track to deliver 300,000 net additional homes a year on average.”<sup>57</sup>

Information on this aspect of Government policy is detailed in the following Library papers:

[Stimulating housing supply - Government initiatives \(England\)](#)

[Tackling the under-supply of housing in England](#)

[What is affordable housing?](#)

Funding for the Affordable Homes Programme was increased to £9.1 billion following the Autumn Budget 2017. There has been an increased focus on delivering a supply of housing at social rents. For example, the Autumn 2017 Budget announced that councils in areas with high affordability pressure would be able to bid for increases in

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<sup>56</sup> Ibid., p23

<sup>57</sup> MHCLG, [Single Departmental Plan](#), 23 May 2018



their borrowing caps from 2019-20.<sup>58</sup> This was followed by the Prime Minister announcing, during her speech to the Conservative Party Conference on 3 October 2018, that borrowing caps would be lifted to support more housebuilding.<sup>59</sup> The Chancellor announced the lifting of borrowing caps with effect from 29 October 2018 during the Budget:

...the Housing Revenue Account cap that controls local authority borrowing for house building will be abolished from 29 October 2018 in England, enabling councils to increase house building to around 10,000 homes per year. The Welsh Government is taking immediate steps to lift the cap in Wales.<sup>60</sup>

Local authorities welcomed the removal of borrowing caps but have also called for the ability to retain 100 per cent of the receipts from Right to Buy sales to ensure their replacement:

It is therefore essential that the Government enables councils to keep 100 per cent of receipts from RtB sales to invest in new housing. Under current arrangements councils are only able to retain a third of receipts from the sale of homes. Local authorities have lost enough homes to house the population of Oxford in the last five years.

Recent LGA analysis reveals almost £3.5 billion in RtB discounts have been handed out to council tenants over the past six years, at an average of £60,000 in 2016/17. This has led to a quadrupling in the number of RtB sales, which councils have been unable to keep up with and replace. This loss of social rented housing risks pushing more families into the private rented sector, driving up housing benefit spending, and exacerbating our homelessness crisis.<sup>61</sup>

## 5.2 The Homelessness Reduction Act (HRA) 2017

Section 2.1 of the MHCLG [Single Departmental Plan](#) sets out an ambition to:

- Implement the Homelessness Reduction Act in April 2018, and explore ways to bring down the number of people in temporary accommodation.
- Develop a strategy to halve rough sleeping by 2022 and eradicate it by 2027.

The [Rough Sleeping Strategy](#) was published in August 2018.

The HRA began its life as a Private Member's Bill introduced by Bob Blackman. It was preceded, in April 2016, by the publication of findings from an independent expert panel which had considered the strengths and weaknesses of the homelessness legislation in England. The Panel recommended a new legislative model in [The Homelessness legislation: an independent review of the legal duties owed to homeless people](#) to:

- place a stronger duty on local authorities to help to prevent homelessness for all eligible applicants regardless of priority need status, local connection or intentionality;

<sup>58</sup> [HC 587](#), November 2017, para 5.23

<sup>59</sup> [Prime Minister's Conference Speech](#), 3 October 2018

<sup>60</sup> [HMT, HC 1629, 2018 Budget](#), para 4.56

<sup>61</sup> [Local Government Association Briefing for Lords Debate 31 January 2019](#).

- extend the definition of threatened with homelessness from 28 to 56 days to provide local authorities with more flexibility to tackle homelessness at a much earlier stage; and
- place a new relief duty on local authorities requiring them to take reasonable steps to help to secure accommodation for all eligible homeless households who have a local connection.<sup>62</sup>

The Bill attracted Government and cross-Party support and gained Royal Assent on 27 April 2017. The main provisions (which are explained in section 1.1 of this paper) came into force on 3 April 2018. The Act forms a major part of the Government's approach to tackling homelessness and reducing the number of households in temporary accommodation. Its main thrust is to refocus English local authorities on efforts to prevent homeless.

A good deal of debate in Public Bill Committee and on Report focused on the likely cost to authorities of the new prevention and relief duties. On 17 January 2017, the Minister, Marcus Jones, [announced](#) that funding of £48 million would be provided to meet authorities' additional costs. Subsequent amendments to the Act resulted in this sum increasing to £61 million. In October 2017, it was confirmed that £72.7 million would be distributed to authorities between 2017/18 and 2019/20 in respect of the new duties.<sup>63</sup>

The Government committed to review the implementation of the legislation, "including its resourcing and how it is working in practice, concluding no later than two years after the commencement of its substantive clauses."<sup>64</sup>

In November 2018, the District Councils Network (DCN) reported that over half of district councils had reported an increase in requests for homelessness advice in the six months since the HRA's introduction, with some areas seeing an increase of 100%. The DCN is calling for additional funding on top of the £72.7 million, greater financial flexibilities for non-stock holding authorities and an early review of the HRA.<sup>65</sup>

The Public Accounts Committee's report, [Homeless Households](#) (December 2017), referred to the Department's reliance on the new Act to provide a solution to homelessness and went on:

While this new legislation will no doubt help, it cannot be successful unless it is matched by a renewed focus across government on tackling the twin issues of both the supply and

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<sup>62</sup> [The Homelessness legislation: an independent review of the legal duties owed to homeless people](#), April 2016, p20

<sup>63</sup> DCLG, [Homelessness Reduction Act new burdens funding](#), 16 October 2017

<sup>64</sup> [HC Deb 27 January 2017 c551](#)

<sup>65</sup> Local Government, "[New homelessness duties impacting on half of district councils](#)," 2 November 2018

affordability of decent housing, which underlie the causes of homelessness.<sup>66</sup>

### 5.3 Unstable private rented sector tenancies

On 17 December 2015 the Communities and Local Government Select Committee launched an inquiry into the causes of homelessness, as well as the approach taken by national and local government to prevent and tackle homelessness.<sup>67</sup> The Committee's [report](#) was published on 18 August 2016. The Committee concluded that, in light of the shortage of social housing, the private rented sector is an "essential means to help people escape and avoid homelessness."<sup>68</sup> However, the Committee went on to highlight financial barriers to access and said that "instabilities of tenancies are too great." Members called on the Government to:

...explore measures to give greater confidence both to tenants and to landlords to encourage them to let to homeless people. Local Housing Allowances levels should also be reviewed so that they more closely reflect market rents. Landlords should be encouraged to offer longer Assured Shorthold Tenancies which allow tenants to leave early without penalty.<sup>69</sup>

On 2 July 2018, the Government published [Overcoming the barriers to longer tenancies in the private rented sector](#). This consultation sought views on the benefits and barriers of landlords offering longer tenancies, saying:

The government is committed to increasing security for tenants in the private rented sector while balancing landlords' needs to regain their properties when their circumstances change.<sup>70</sup>

Consultation closed on 26 August 2018; feedback is currently being analysed.

### 5.4 Welfare reform

There have been numerous reports which have identified welfare reform, and changes to Housing Benefit/Local Housing Allowance entitlement, as a contributing factor to homelessness (see section 2). The CLG Committee's 2015-16 homelessness inquiry found that "The impact of the welfare reforms of recent years have increased pressure on levels of homelessness."<sup>71</sup>

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<sup>66</sup> [HC 462](#), 20 December 2017, p3

<sup>67</sup> Links to the written evidence can be found on the [Committee's website](#).

<sup>68</sup> [CLG Select Committee, Third Report of 2016-17, Homelessness, HC 40](#), August 2016, para 21

<sup>69</sup> Ibid.

<sup>70</sup> MHCLG, [Overcoming the barriers to longer tenancies in the private rented sector](#), 2 July 2018

<sup>71</sup> [CLG Select Committee, Third Report of 2016-17, Homelessness, HC 40](#), August 2016, para 36

The Committee specifically recommended the introduction of a grace period for 18-21-year-olds before losing the housing element of Universal Credit<sup>72</sup> and said:

All recipients of housing support should have the option of having their housing benefits paid directly to their landlord, reducing the likelihood of them falling into arrears and increasing landlord confidence and willingness to let to tenants at risk of homelessness.<sup>73</sup>

This recommendation was rejected:

Allowing claimants to opt out of their responsibility for managing their own money is a backwards step, and does not encourage the change in behaviour Universal Credit aims to deliver. The Government's position remains that the current discretionary power to make direct payments provides sufficient protection for those that need it.<sup>74</sup>

As noted in section 2, the Ministry and DWP have jointly commissioned a feasibility study into the wider causes of homelessness, "including households' experience of the welfare system as well as other factors such as housing affordability or relationship breakdown."<sup>75</sup>

## 5.5 Funding to tackle homelessness

In September 2017, the National Audit Office summarised the financial support aimed at tackling homelessness up to 2020:

The Department is distributing homelessness funding of £754 million between April 2016 and March 2020 through a combination of the local government financial settlements, new burdens funding, and a grant to replace the temporary accommodation management fee previously paid by the Department for Work & Pensions. In addition, it has developed a £50 million Homelessness Prevention Programme to encourage innovative approaches by local authorities to homelessness prevention.<sup>76</sup>

As previously noted, in October 2017 it was confirmed that £72.7 million would be distributed to authorities between 2017/18 and 2019/20 in respect of the new duties introduced by the *Homelessness Reduction Act 2017*.<sup>77</sup>

October 2018 saw the launch of [bidding guidance](#) for a £20 million Private Rented Sector Access Fund. This fund is aimed at relieving rough sleeping, but may also assist with homelessness prevention/relief work and reducing the use of temporary accommodation for households who would otherwise be owed a full rehousing duty under the *Housing Act 1996*:

<sup>72</sup> Note that as of 31 December 2018 entitlement has been reinstated for this group of claimants.

<sup>73</sup> [CLG Select Committee, Third Report of 2016-17, Homelessness, HC 40](#), August 2016, paras 30 and 34

<sup>74</sup> [CM 9443](#), March 2017, para 25

<sup>75</sup> *Ibid.*, p31

<sup>76</sup> NAO, [HC 308](#), September 2017, para 19

<sup>77</sup> DCLG, [Homelessness Reduction Act new burdens funding](#), 16 October 2017

The Private Rented Sector Access Fund compliments existing government action to tackle homelessness and rough sleeping. It sits alongside our £1.2 billion funding programme to tackle homelessness, and the Homelessness Reduction Act, the most ambitious legislative reform in decades, to ensure more people receive the help they need, at an earlier stage.<sup>78</sup>

Responding to this announcement, the LGA said:

... if we're to truly tackle homelessness in this country, we need to be moving much further, much faster. With the loss of a private rented tenancy the leading cause of homelessness, it's essential that those on the sharp end of our housing crisis are given as much support as possible.

Councils need urgent action to support them in their fight against homelessness, **which is why the Government should devolve all homelessness funding to councils so that they can address the issues around homelessness in their local area.**<sup>79</sup>

Local authority expenditure on temporary accommodation (TA) has attracted specific attention. In August 2018, *Inside Housing* reported on the results of Freedom of Information requests received from 290 English authorities which showed that they spent £937 million<sup>80</sup> on TA for homeless households in the financial year 2017/18. Costs were estimated to have risen by 56% between 2013/14 and 2017/18.<sup>81</sup>

## Value for money?

The NAO's report, [Homelessness \(2017\)](#), considered whether DCLG (now MHCLG) was achieving value for money in its administration of homelessness policy. Specifically, the NAO examined whether:

...the Department should show that it has understood the causes and costs of homelessness, that it is using this understanding to drive the effective use of its resources, and is leading government efforts to tackle homelessness effectively.<sup>82</sup>

Overall, the NAO concluded that the Government's approach to tackling homelessness could not demonstrate value for money:

Although it is the government department with responsibility for tackling homelessness, during its increase in recent years the Department took a light touch approach to working with local authorities. It is difficult to understand why the Department persisted with this approach in the face of such a visibly growing problem. It is only now beginning to put in place the measures that will allow it to maximise the effectiveness of the resources it directs at homelessness. There remain gaps in its approach and it has not, for example, sought to evaluate the majority of funding provided to prevent and tackle homelessness. The Department's recent performance in reducing homelessness therefore cannot be considered value for money.<sup>83</sup>

The NAO's report included four recommendations for Government:

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<sup>78</sup> MHCLG, [£20 million Private Rented Sector Access Fund](#), October 2018

<sup>79</sup> [LGA response to homelessness funding announcement](#), 10 October 2018

<sup>80</sup> This refers to gross spend and does not take account of money recouped in the form of Housing Benefit.

<sup>81</sup> *Inside Housing*, "The cost of homelessness: council spend on temporary accommodation revealed," 31 August 2018

<sup>82</sup> NAO, [HC 308](#), September 2017, para 6

<sup>83</sup> *Ibid.*, para 24

- a. The Department should develop and publish a strategy that sets out how it will achieve its objectives relating to homelessness. This should set out the reduction in homelessness it is aiming to achieve and the contribution it expects from different programmes across government.
- b. The Department should work with local authorities to establish how they are making use of measures to tackle homelessness, in order to gain a full understanding of effectiveness and share best practice.
- c. The Department should work with local authorities to ensure that they are making the most effective use of temporary accommodation. This work should include enabling local authorities to increase their use of the innovative short-term solutions that they are taking.
- d. The government, led by the Department and the Department for Work & Pensions, should develop a much better understanding of the interactions between local housing markets and welfare reform in order to evaluate fully the causes of homelessness.<sup>84</sup>

Subsequently, the Public Accounts Committee (PAC) considered the NAO's findings – the PAC's [report](#) (December 2017) described the extent of homelessness across England as “a national crisis” and made several recommendations including:

- The publication of a cross-government strategy for reducing homelessness with clear targets and actions.
- A call for DCLG to report back by the end of the year on progress in reducing homelessness across all measures.
- A call for DCLG to report back on work with the DWP to consider the impact of welfare reform on homelessness.
- Steps to eliminate the use of non-decent temporary accommodation.
- Report back on how new “genuinely affordable” housing will be matched to areas of housing need and how the impact of this on reducing homelessness is being monitored.
- Report back on how new homelessness data is improving estimates of the cost of homelessness; the extent of homelessness; its impact on individuals; and the effectiveness of local services.<sup>85</sup>

The [Government's response](#) was published in March 2018. A commitment was made to publishing a cross-government strategy for reducing homelessness. The Rough Sleeping and Homelessness Reduction Taskforce chaired by the Housing Secretary, is focusing first on measures to reduce rough sleeping:

To allow changes to homelessness prevention to become embedded following implementation of the Homelessness Reduction Act in April 2018, **the Taskforce will then seek to develop a broader strategy to ensure progress is made on**

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<sup>84</sup> Ibid., p11

<sup>85</sup> HC 462, [Homeless Households](#), 20 December 2017

**wider issues relating to all forms of homelessness and homelessness prevention.**<sup>86</sup>

The [Rough Sleeping Strategy](#) was published in August 2018.<sup>87</sup> The intention is to “develop a broader strategy to ensure progress is made on wider issues relating to all forms of homelessness and homelessness prevention” once the Homelessness Reduction Act measures have bedded in.<sup>88</sup>

The [Ministry reported back to the PAC](#) in December 2018 on reductions achieved across all measures of homelessness.<sup>89</sup> As noted in section 2, the Ministry and DWP jointly commissioned a feasibility study into the wider causes of homelessness, “including households’ experience of the welfare system as well as other factors such as housing affordability or relationship breakdown.”<sup>90</sup>

On eliminating the use of non-decent temporary accommodation, the Ministry agreed and said:

To support the implementation of the Homelessness Reduction Act, the Department has set up a team of advisors who will work directly with local authorities – the Homelessness Advice and Support Team (HAST). An initial priority for these advisors has been providing targeted support for local authorities who have families in Bed and Breakfast accommodation beyond the statutory limit of 6 weeks. This work is already underway, and has included targeted visits, as well as a workshop involving authorities who use Bed and Breakfast to share best practice and experiences from authorities who have successfully tackled the problem. The HAST’s work will continue for an initial period of two years.

[...]

In April 2017, the Department introduced the Flexible Homelessness Support Grant, which gives local authorities more control and flexibility in managing homelessness pressures. Funding for 2017-18 and 2018-19 is a total of £402 million. Unlike the DWP Temporary Accommodation Management Fee, which was a reactive payment that could only be used for particular types of temporary accommodation, the new grant is upfront funding, which can be used flexibly as part of councils’ resourcing for their homelessness strategies including more cost-effective ways of sourcing temporary accommodation.

£25 million of this Grant has been retained for London, where the issue is most acute, to look at improving collaboration on temporary accommodation between boroughs to increase the quality of temporary accommodation in the Capital and deliver greater efficiency in procurement. In April 2017, the Department commissioned a joint study, with London Councils and the Greater London Authority, to consider options. The Department is currently considering the recommendations, which it expects to

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<sup>86</sup> [Cm 9575, March 2018](#), p29

<sup>87</sup> MHCLG, [Rough Sleeping Strategy](#), CM 9685, August 2018

<sup>88</sup> [Cm 9575, March 2018](#), p30

<sup>89</sup> [MHCLG correspondence with PAC on homelessness](#), 20 December 2018.

<sup>90</sup> *Ibid.*, p31



take forward this year. The Department will report back on progress to the Committee by December 2018.<sup>91</sup>

The Government agreed that its new data system, H-CLIC, should help in estimating the wider costs of homelessness to public services.<sup>92</sup>

## 5.6 Are other measures needed?

In [Everybody in: a plan to end homelessness in Great Britain](#) (June 2018), Crisis argues for wide-ranging measures to ensure that people rarely lose their home and when they do there is a speedy solution. The Crisis recommendations include:

- Building 100,500 new social homes each year for the next 15 years to meet the needs of homeless people and people on low incomes – including those at risk of homelessness.
- Housing Benefit that covers the cost of housing and reflects projected rent rises.
- Enabling everyone to access help, including abolishing priority need in England and Wales; ensuring that a lack of a local connection is never a barrier to support; and introducing robust regulation and monitoring of how key bodies support people facing homelessness.
- Funding of Critical Time Interventions, an evidence-based approach that helps people move quickly into their own home.
- A strategic approach by government working across all relevant government departments, at a local and national level, on a shared long-term vision of how to make it a reality.<sup>93</sup>

The Government gave the following response to a PQ on what assessment had been made of the validity of the findings in [Everybody in: a plan to end homelessness in Great Britain](#) on 28 June 2018:

I welcome Crisis's report and Government shares the broad ambition it sets out. That is why we have committed to halving rough sleeping by 2022 and ending it by 2027. As part of this we have established the Rough Sleeping Advisory Panel and a cross-Government Ministerial Taskforce to support the development and implementation of the Rough Sleeping Strategy. Crisis sit on the Advisory Panel and supported the work to put forward a number of recommendations for the Rough Sleeping Strategy.

I will continue to consider the findings outlined within the report ahead of the publication of the Rough Sleeping Strategy. My Department will also continue to work with Crisis once the strategy has been published and remain committed to tackling both rough sleeping and broader issues of homelessness as highlighted in the report.<sup>94</sup>

In July 2018, the Local Government Information Unit (LGiu) launched a [Homelessness Commission](#) to develop recommendations for councils in tackling homelessness, spreading best practice and producing expert

<sup>91</sup> Ibid., pp31-32

<sup>92</sup> Ibid., p33

<sup>93</sup> Downie, M., Gousy, H., Basran, J., Jacob, R., Rowe, S., Hancock, C., Albanese, F., Pritchard, R., Nightingale, K. and Davies, T. (2018) [Everybody in: a plan to end homelessness in Great Britain](#). London: Crisis

<sup>94</sup> [Written question – 155359, 28 June 2018](#)

evidence, as well as making “firm demands of central government for the resources, powers and infrastructure that will enable them to do so.” A full report on the outcomes of this work is expected in “early 2019”.<sup>95</sup>

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<sup>95</sup> LGiu launch local government Homelessness Commission, 6 July 2018

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