**Officers’ Response to the Local Connection Review Group Recommendation**

**Introduction**

1. Preventing rough sleeping has been a long standing commitment of Oxford City Council and is reflected in the current Housing and Homelessness Strategy as

*“In line with the Government’s aim to have zero rough sleepers by 2027, work to reduce rough sleeping and single homelessness through collaborative partnership working; delivery of effective supported housing pathways to help people to sustain their existing accommodation; and to provide accommodation and support for those in housing crisis.”*

1. Demand has always outstripped supply in this area of work but the recent years of austerity, significant welfare reform and severe cuts by the County Council starting in April 2017 have resulted in a significant decommissioning programme, resulting in a reduction in services and specifically bed spaces.
2. Within the context of these budget reductions, Oxford City Council has responded with absolute commitment to try and continue to provide services to meet the needs of the City. This includes the commissioning of Project 41, (41 units of dispersed supported accommodation across East Oxford for people stepping down from 24/7 hostel accommodation to semi-independent accommodation) following the closure of Julian Housing and the development of a new hostel at Rymers Lane to mitigate the decommissioning of the 52 units at Simon House.
3. As the national government renews its commitment to halving rough sleeping by 2020 and ending it completely by 2027, there are currently a number of new funding opportunities available. A number of successful bids totalling over £1m have already been secured which have enabled the expansion of bed provision in the City. Further funding opportunities are available and officers are actively looking at what opportunities these may bring.
4. This is in addition to the current £1.4m commitment in base budget in 2018-2019 relating to this specific area of work.

**Ending Rough Sleeping**

1. As cited in the report, ending rough sleeping is a deeply complex issue for which there is not one solution. In many ways, the adult homeless pathway manages the symptoms of many other systems under pressure, such as the criminal justice system, the welfare system and the care system for young people and ending rough sleeping realistically will require system reform and change across all these systems.
2. The City’s Trailblazer Programme seeks specifically to improve housing’s interaction with some of these systems on a local level, with a view to improving the housing outcomes for many trapped within these systems. Specialist housing workers have been embedded on the front line of these systems (across all of the County’s hospitals, at Bullingdon prison and at community-based Probation and Community Rehabilitation Company offices and across children’s social care) leading to the earlier identification and prevention of homelessness before crisis point is reached. Trailblazer has also established a network of Champions across all our public authority and voluntary sector partners who are trained to a high level in housing, prevention and the suite of available options. In addition, the programme’s learning, findings and failures are shared openly with those systems and at a national level through MHCLG and at ministerial round tables to further influence legislative and policy direction.
3. From a commissioning perspective, officers are fully engaged in the commissioning of other supported pathways such as the Young People’s pathway and previously the Mental Health Pathway.
4. The reconsideration of the City’s local connection policy is therefore one of many things that needs to be considered.

**Current Services for people with No Local Connection.**

1. This report concerns itself with the issue of no local connection and therefore it is worth noting at the outset that a number of services, following the successful bids mentioned in paragraph 4, have been recently commissioned both for people with no local connection and/or no recourse to public funds with a total of 41 additional beds.
2. This is in addition to Council funded services such as Emmaus who provide 20 units of accommodation which doesn’t apply the local connection criteria to its community. There are other projects such as ACT and Compass (dispersed, supported housing for people with a history of offending) that the Council has funded in the past and do not apply the local connection criteria.
3. It is also worth noting that the mental health pathway which comprises of 356 units does not require a local connection, only to be registered with a GP locally.

**Officers’ response to the Recommendations**

1. It is noted that this review seeks to understand the impact of the local connection policy on the Adult Homeless Pathway (AHP), with access to these services governed by demonstrating the need to access supported accommodation (whether needs are high, medium or low), eligibility for public resource and the application of the Local Connection policy.
2. There are some broad themes in the report that Officers would draw attention to:-

**The many applications of Local Connection**

1. There is a particular focus on the application of this policy at the entry point to the AHP. As noted in the report, the local connection policy is governed by the Common Operational Protocol, under the management of the Joint Management Group (Oxfordshire County Council, the 5 District Housing Authorities and Oxfordshire Clinical Commissioning Group). This group of officers oversees the commissioning and operational work of the pathway and reports to the Health Improvement Board. Any changes to the Common Operational Protocol requires full agreement by all parties and therefore is not within the gift of Oxford City Council alone.
2. In addition, any changes to policies that increases access needs a corresponding increase in capacity of the AHP which will require additional funding and infrastructure.
3. Any changes at the entry point that increases flow will impact the throughput across pathway, unless there is also change to the application of local connection at the exit point. No change to the exit route will only serve to “block” the AHP by not providing any realistic move on options for people.
4. In this case, the exit criteria is governed by the definition of Local Connection within the Allocations Scheme (to enable the option of a Part 6, social housing move on option to be considered). The Allocations scheme is a policy framework document and for any significant changes to be made it needs to both be publically consulted upon and endorsed by CEB and adopted by Council. Such changes would impact people who are already waiting on the General Register. Discretion is already granted within the framework and a quota of 50 units is specifically allocated to the AHP to facilitate move-on from this pathway.
5. Where there is reference to Local Connection relating to the Homelessness Reduction Act (Part 7 of the Housing Act 1996) this is laid down in statue and therefore governed by national legislation with no discretion.

**Exemptions**

1. A large number of the early recommendations e.g. Recommendation 1 and 4 suggest changes that are already administered under exemption and discretion criteria within the current policy. It is Officers’ recommendation not to be too prescriptive in terms of exemption criteria as the considerations and complexities of peoples’ lives are impossible to list and for the policy to remain as it is, allowing specialist officers to exercise discretion in all kinds of circumstances. Where this is the case, it has been noted in the response to recommendations in Appendix 1.

**Impact**

1. There are conflicting schools of thought in terms of the “magnet effect” of relaxing local connection policy. Officers would therefore recommend it is imperative to understand the impact of any policy change before its implementation, rather than retrospectively, and would recommend that a full impact assessment takes place first with recommendations for the necessary financial and structural changes required to manage any potential increase in demand. Without this there is the danger that expanding the criteria will not reduce the number of rough sleepers on the streets, but only serve to replace those in the system with a local connection with people without a local connection.
2. A detailed response to each of the recommendations is attached in Appendix 1.

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