**Appendix 1 Officer Comments and Advice on Recommendations of the No Local Connection Review Group**

**TBA by Scrutiny Committee 06-Nov-18**

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| **Recommendation** | **Officer comments** |
| **Part 1: Redefining the Local Connection** |  |
| **Recommendation 1:**  That the Council extends the exemption criteria within the Local Connection Policy to provide a more comprehensive narrative and make clear that discretion may be used to offer a local connection to a person in circumstances where: | There is already unfettered discretion within the current procedures which is regularly exercised (especially in the granting of an exemption) and are written in such a way as to be flexible and to allow for discretion, rather than to prescribe a response to any and every eventuality. Examples of how exemptions might be applied can be shared.  It should be noted however, that current exemption criteria, which grants access to the pathway, usually with a Pathway Connection, still limits the move-on options available on exit. Any changes at the exit point will require changes to the Allocations Policy. See (1) above.  It should also be noted that Oxford has a concentration of rough sleepers from Oxfordshire, but often also from neighbouring areas that may not have such good service provision, including Aylesbury and Reading. The Council would be failing in its fiduciary duties (in spending Oxford residents money correctly and achieving best value) if it offers services to persons with a stronger local connection to another local authority. |
| 1. They are known by the Council to have slept rough or ‘sofa surfed’ in Oxford for a continuous period in excess of 6 months, with no clear prospect of reconnection to another local authority area. | This is already possible and is often considered for when an exemption is sought. In some cases, exemptions are granted before 6 months and this is an example of why one shouldn’t be too prescriptive in terms of the exemption criteria.  There is a risk that should this message be communicated widely, it could have the unintended consequence of dis-incentivising a person’s engagement with Oxford Street Population Outreach Team [OxSPOT] and other services, on the grounds that continuing to sleep rough could enable the person to secure a local connection regardless of their engagement. |
| 1. Their long term physical or mental health condition (including substance misuse) poses a significantly elevated risk to that person’s health and safety, beyond that experienced by other rough sleepers. | This is already possible under current policy, although if a person has a better connection elsewhere, then a reconnection (after urgent risks have been actively reduced) is preferred, especially if that connection is to an Oxfordshire District Council area.  However, if Mental Health is the primary need, and the client is clustered, then access to the Oxfordshire Mental Health Pathway would be more appropriate and is via a GP connection. |
| 1. They are known by the Council to be fleeing violence from another area within the UK, with no clear prospect of reconnection to another local authority area that is considered safe. | This is already the case, in that an ‘exemption’ is granted to enable access into the pathway. |
| **Recommendation 2:**  That the Council grants a lifetime local connection to people who were born in Oxford, where no period of absence from the City would invalidate their connection, except in circumstances where they have a more appropriate local connection to another Oxfordshire district. | Any changes to policy should relate to ‘pathway connection’ only for the reasons stated at (1) above.  This recommendation is unworkable in terms of volume and application. Relaxing the criteria in relation to birth is problematic, as on this basis all children born in the John Radcliffe regional, general hospital would qualify.  Other options for demonstrating an enduring local connection, e.g. that a person has spent the majority of their childhood years in the city, are also problematic because of the difficulties – for the individual and the Council – in producing / reviewing evidence.  However exemptions can be granted when people are unable to demonstrate strong connections, but equally have demonstrable connections to the City.  If a person has a better connection to another area, for example because they have lived continuously in that area for many years, then the option of reconnection should be explored first.  Granting a far bigger pool of potential homeless persons a local connection will only result in more people being accommodated in the AHP if the capacity (and throughput) increases. This increased demand could also result in more competition at entry to the AHP with people’s expectations being raised beyond the ability of the pathway to meet these needs.  This needs to be understood and assessed before the implementation of such significant changes.  We should also note our responsibilities under the Equalities Act. |
| **Recommendation 3:**  That the Council grants a local connection to people confirmed as sustaining a contracted voluntary role within the City for a period of 6 months. | Undertaking paid work can already help a person to establish a Local Connection under the AHP Policy. This work must be genuine (usually over 16 hrs per week and not very short term), and can include zero hour contracts, but must be evidenced, eg. with wage slips. Voluntary work could be considered with stipulated criteria including hours spent volunteering in order to evidence a legitimate placement.  The Allocations Scheme (which helps enable exit from the AHP) requires applicants – seeking to establish a Local Connection through employment only – to be undertaking work in Oxford, of over 16 hours per week, and that this is not ‘short term, marginal or of a temporary nature’.  For purpose of the Housing Act 1996, the Local Authorities Agreement (The Procedure for Referrals of homeless applicants to another local authority) clearly indicates that employment cannot be of casual nature.  In this context, voluntary work would be considered as casual work and would not therefore provide sufficient evidence of employment for either the AHP or Allocations Scheme. |
| **Recommendation 4:**  That the Council extends the close relatives connection criteria to include first cousins, grandparents and grandchildren. Deceased family members in the immediate family (mother, father, brother, sister or children) should also be explicitly referenced in the policy as providing a connection. | See comments above.  The purpose of the ‘close family associations’ LC approach is to recognise frequent ‘contact, commitments or dependency’ that someone may have with close family members that have been resident in the city for 5 years or more, and the mutual benefit that this can provide.  Grandparents and grandchildren are already recognised as being ‘close family’ as are step-families. First cousins are not recognised, but the policy allows for flexibility in exceptional situations. Deceased relatives do not meet this criterion.  For the purpose of the Housing Act 1996 in order to give rise to a local connection, the family members relied upon as family associations should usually have been resident in the district for a period of at least five years at the date of application from homelessness assistance, or for a lesser period if the family situation means that five year residence could not apply, for instance in cases of refugees or other recent arrivals to the UK. |
| **Recommendation 5:**  That a person’s stay into institutions such as hospital, prison or rehab should not invalidate their local connection. Specifically, time spent in these institutions should not affect a person’s residency connection time (six out of the last twelve months or three out of the last five years), and entry and exit into these institutions should ‘freeze’ the accounting period. | This is already the case when considering local connection in the context of AHP.  Other approaches including Priority 3 applications to the AHP and work undertaken by the Trailblazer to prevent homelessness and rough sleeping.  For purpose of the Housing Act 1996 The Local Authorities’ Agreement suggests that a working definition of normal residence sufficient to establish a local connection should be residence for at least 6 months in an area during the previous 12 months, or for three years during the previous five year period. The period taken into account would be at the date of the decision. For the purpose of the Housing Act 1996 it is not done, and is not within our gift to change,  Where the applicant has no local connection with any authority, this will confer a connection with where they choose to apply under Housing Act 1996. |
| **Recommendation 6:**  That the Council negotiates terms with neighbouring district councils to grant an Oxford local connection to people with a connection to areas adjoining, or very close to, the city boundary such as Botley and Kennington, where it is requested. | See previous comments about the Council’s fiduciary duties [Recommendation 1].  The Vale of White Horse Council has a duty to persons rough sleeping or with a Local Connection to those parts of Botley outside of the Oxford City Boundary, and also Kennington. District Boundaries, not urban areas are used for this purpose, as they are for all Council duties.  This would also apply to other adjacent areas such as Kidlington. |
| **Recommendation 7:**  That where any changes to the Local Connection Policy (set out in recommendations 1-6) are not amenable to the City Executive Board on a permanent basis, a 12 month pilot should be taken up to provide insights into the level of demand, cost and effectiveness of introducing such changes. | The costs and impacts of the proposed changes would need to be appraised, understood and properly resourced before they can be implemented.  As the effects of the proposed changes are untested and the results are unknown, there is a high risk that implementing the changes in a ‘live system’ could overwhelm the AHP, leading to delays in admission even for eligible individuals and blockage at the point of exit. |
| **Recommendation 8:**  That the Council partners with Crisis and other partners (e.g the City Conversation) to undertake a full assessment of the social and economic impact of any changes to the Local Connection Policy after 1 year of implementation (or piloting). The outcome of the assessment should be reported to the Scrutiny Committee and the City Executive Board, and should include data and conclusions concerning:   1. The demand for bed spaces within the pathway 2. The proportion of people rough sleeping with a connection to Oxford 3. The estimated savings and expenditure for other public services 4. Any impact on equalities, with a specific focus on gender and sexuality 5. How any changes have impacted on neighbouring district councils | As stated above [Recommendation 7], the costs and impacts of the proposed changes would need to be assessed in advance of any changes to AHP Policy to determine costs, impacts and risks.  This would be a substantial, detailed piece of work that would need to be commissioned from an organisation or individual, requiring funds to be identified and secured.  The City Council would also need to allocate time and resource to commission the work and assist with data, benchmarking etc.  It should be noted that via the MHCLG-funded Rough Sleeping Initiative (RSI) Programme, changes including increased access to accommodation for people with no LC or RPF are already being piloted, with evaluation and learning built in.  With regard to Recommendation 8d) appears to be outside of scope of the LC Review. |
| **Recommendation 9:**  That the Council makes representations to the other Oxfordshire District Councils to:  a) Increase their funding for bed spaces in O’Hanlon House, particularly for those individuals with complex needs.  b) Adopt any changes agreed to Oxford’s Local Connection Policy, and that any agreed changes be updated in the Oxfordshire Adult Homeless Pathway Common Operational Protocol.  c) Collectively review the system for allocating bed spaces to remove procedural barriers to ‘lending’ beds between the Oxfordshire District Councils, to adjust for varying demand between the localities. | 1. There is no capacity to increase bed spaces at O’Hanlon House as the 56 units are split between the 5 Districts. Oxford City has 27 of these units and the remainder are split between the other authorities. It would be better if the Council could encourage the Oxfordshire District Councils to increase provision for people with complex needs in their localities. 2. Any changes to the Policy / Common Operational Protocol which governs operation of the AHP would need to be agreed by the Joint Management Group (JMG) which oversees the joint commissioning arrangements between Oxfordshire County Council, OCCG, Oxford City Council and the Oxfordshire District Councils. 3. Officers are not aware of any barriers to lending beds between the Oxfordshire District Councils. |
| **Part 2: Reconnecting People** |  |
| **Recommendation 10:**  That an individual’s refusal to engage with the Council, or to reconnect to another area, should not restrict their access to the sit-up service, except in circumstances where they pose a risk to the safety or progress of other people using the service. | Many people enter the AHP via the sit-up service. OxSPOT work with people in sit-up to establish trust and engagement, so a person entering the service may not initially be fully engaged.  However, it’s important that there is high throughput through the service to prevent it becoming blocked and therefore preventing another person coming in from the streets. If a client refuses to engage with services during their time in sit-up, there is a risk that their occupancy will block access for another individual. This would significantly change the purpose for which it was designed. |
| **Recommendation 11:**  That the Council trials a reconnection log for 12 months to monitor the outcomes and effectiveness of reconnections to other areas. The reconnection log should be presented to the Housing Panel when there is sufficient data to draw conclusions. | This is possible but following up on re-connection would require longitudinal analysis for which additional resource would be needed. |
| **Recommendation 12:**  That the Council commissions a report to be brought forward in 2019 setting out options for establishing a county wide reconnection service having regard to lessons that can be learnt from the London-wide reconnection service. | The Council already funds this. Other Councils can be approached, but may not wish to fund – and they use different outreach models and providers. Maybe the County Council should be asked to lead this? |
| **Part 3: Allocating Housing** |  |
| **Recommendation 13:**  That the Council revises the Housing Allocations Scheme to: | The Head of Housing is delegated to make minor changes to the Allocations Scheme, but as a framework document, and under law, any more substantial change would require consultation and agreement at full Council.  It is also agreed by the ORAH partnership with key RP partners, with the agreement for the Council to operate the scheme on behalf of the ORAH partnership. |
| 1. Accept any person who qualifies for a local connection under any accepted recommendations in this review onto the Housing Register. | With regard to the ‘Housing General Register’ – this is based on ‘settled accommodation’ i.e. 6 out of the last 12 months of settled accommodation immediately prior to the application, or 3 out of the last 5 years of settled accommodation in that district only. There is the opportunity for people ready to move-on from agencies (in the AHP, and the mental health pathway) to be included in the General Register with Move-on priority status, when appropriately referred from that provider.  There may be some scope to review some supported accommodation in the city, to determine whether residence of greater than two years, should be considered ‘settled’ including Emmaus, some Response accommodation, and some other provision (inc ACT). 6 months would not be considered a significant enough stay.  If this is referring to persons to whom the Council has accepted a statutory homeless duty following an approach under homelessness legislation (Housing Act 1996 as amended) – definitions are set by legislation and case law and cannot be determined locally.  Please note that there are already 2200 people on the Council’s Register and that this recommendation is considered within the context of trying to manage a scarce resourse. |
| 1. Ensure that time spent in prison, hospital or rehab does not affect a person’s residency connection time (six out of the last twelve months or three out of the last five years), and entry and exit into these institutions should ‘freeze’ the accounting period. | Not possible under law (Part 7) and any change with regard to the housing register (Part 6) would constitute a major change to Allocations Policy.  In the context of the local housing crisis in Oxford, Allocations Guidance advises a strong bias for residence within District, exemptions are available already, all local Districts apply similar LC policy to OCC in Oxon. A change to this would mean a large increase in the number of applications from those with a past or tenuous connection Oxford , possibly inadvertently increasing street homeless as more come to Oxford from the Districts. It is very had to verify circs/lc and local residents with a strong connection will be disadvantaged because housing offered to those others.  Officers would be more concerned about its application to e.g. the mental health pathway which has over 356 units none of which require any consideration of local connection. |
| 1. Accept any person onto the Housing Register who is confirmed as having lived in supported accommodation continuously within Oxford for more than 6 months, including accommodation services that are recognised but not directly funded by the Council. |
| **Part 4: Commissioning and Budget Setting** |  |
| **Recommendation 14:**  That the City Executive Board commissions a report to be brought forward in 2019 setting out options for the Council entering into arrangements with colleges, registered social landlords and private landlords to take over and refurbish sub-standard and empty properties. The Council would then sublet the refurbished properties, at a minimum rent, to priority homelessness cases before returning the properties to their owners after a mutually agreed period. | Officers submitted a report to CEB in September 2017 setting out these options. To date, despite numerous attempts by Officers, no buildings have been successfully brought forward.  Note also the Real Lettings developments to meet the needs of people moving on from the pathway. |
| **Recommendation 15:**  That the Council continues to commission at least one female only overnight accommodation provider in the Adult Homeless Pathway and keeps demand for this provision under review. Opportunities should be sought to extend this provision for women with no local connection where possible, if further spaces are needed to meet demand. | A women’s only service is currently being piloted as part of the RSI initiative. Officers will use this initiative to learn more about what is needed in the future.  Consideration is given to ensuring that various needs, vulnerabilities and personal characteristics can be met in any new service provision, and this was one of the drivers to de-commission larger homeless hostels and move to dispersed provision and to hostels that cluster rooms together and minimise open communal spaces, etc  Local connection for this service reflects previous comments made. |
| **Recommendation 16:**  That the City Executive Board, as part of its budget setting process, identifies provision for:   1. Free room hire and refreshments for a female homelessness forum. The Council should also ensure these women’s views are represented within the Council’s decision making process on homelessness issues. 2. Free sanitary products to be available for women experiencing homelessness 24 hours a day. The location of distribution for these products should be agreed in liaison with women currently experiencing homelessness. | The Council should be able to support this, subject to confirmation by the Town Hall .  There are already many opportunities for service-users’ experience to be fed back, including through the Tenant Involvement Team (in Housing); into the County Housing Support Advisory Group (HSAG – officer group - under the Heath Improvement Board); and to the Council’s Housing Panel or Scrutiny group but officers also open to doing more and ensuring people with lived experience’s voices are heard. |
| **Recommendation 17:**  That the Council makes on site provision for domestic pets a material consideration as part of the supported accommodation commissioning process. | To be noted that much of the dispersed supported housing is leased from the private sector and therefore nearly always has a strict no pets policy but officers can continue to consider when commissioning.  It should also be noted that having a dog is a significant barrier to move on with many RPs and most private sector landlords refusing to allow pets.  Anyone engaging with OxSPOT or other services will receive advice on looking after pets and charities that can assist.  SWEP 18/19 will continue to provide kennelling for any person who needs it for their dog. |
| **Recommendation 18:**  That the Council engages with Crisis and the City Conversation to see what further opportunities exist for piloting innovative Housing First and Critical Time Intervention programmes, given their rates of success and relative cost-benefit ratios. | Housing First, as well as Acacia Housing (which is based on the same principles) has been commissioned in Oxford for the last 6 years.  Officers would welcome the exploration of Critical Time Interventions. |
| **Recommendation 19:**  That the Council, as part of its budget setting process, gives consideration for contingency funds to be made available for the Council’s commissioned outreach Service (OxSPOT) to be more flexible and reactive to changes in homelessness demand throughout the year. For example, extending shifts to meet spikes in the numbers of people sleeping rough. | Increased capacity and flexibility has already been achieved as a result of the service expansion, funded by the MHCLG grant for the RSI Programme.  As part of ongoing efforts to optimise the effectiveness of services and in order to meet national targets for the elimination of rough sleeping by 2027, Officers be asked to explore how front end services including Outreach can be focussed and aligned to deliver improved client outcomes, year round, including building in flexibility to gear capacity up and down to meet demand. |
| **Recommendation 20:**  That the Council writes to Central Government to welcome the new funding made available through MHCLG this year, and lobby for greater assurance about the necessity of long term funding to sustain new support services which will help deliver their Rough Sleeping Strategy. | Officers would welcome this recommendation. |
| **Part 5: Communicating What We’re Doing** |  |
| **Recommendation 21:**  That all future Council policy documents referencing homelessness should recognise the net positive contribution that people experiencing homelessness can make (e.g. the skills, experience and diversity they bring). Homeless people themselves should not be framed in a negative light and this should be reflected in the Council’s communication’s plans. | The Council already takes care in its communications to portray the stories of homeless people positively, for example via the videos recently commissioned for the Trailblazer Programme,  The Council also commissions services to take an asset or strengths based approach to supporting people who are experiencing homelessness, and to work with people in a psychologically informed way.  However, it is also worth noting that sleeping rough is dangerous and those who do are highly vulnerable, and efforts to portray the positive contributions that people experiencing homelessness can make, should not obscure this. . |
| **Recommendation 22:**  That the Council recognises the value someone’s homelessness experience can potentially bring to the employed officer workforce, and that it be given due weight in the recruitment process for staff supporting the homelessness function. | Commissioned service providers are encouraged to develop user groups for their services. Many recruit workers from their volunteer base, including GROW workers. For example, Aspire employs 3 GROW workers as community navigators under the Trailblazer (commissioned contract).  Employment and recruitment for the City Council is covered under HR policies, and are designed to enable fair recruitment and ways to actively encourage diversity are welcomed. |
| **Recommendation 23:**  That the Council revisits its approach to communicating with people experiencing homelessness, local service providers and the public to better convey information about the Local Connection Policy, how it is applied, and what wider support services are available in the City. Any significant changes (e.g a new notice board or public leaflet) should be presented to the Housing Panel for comment prior to implementation. | Information relating to rough sleeping and homelessness is already provided on-line and in key locations for rough sleepers, and persons wanting to report rough sleeping, including in the window of the customer contact centre at St Aldates, the Police Station etc.  Officers agree that more can be done to improve communications with people experiencing homelessness and other stakeholders, however it is important to note that the best thing that any person who is concerned about somebody who maybe sleeping rough is to: Contact Oxford SPOT on 01865 243 229 or via email [Outreach.Oxford@mungos.org](mailto:Outreach.Oxford@mungos.org)Oxford SPOT is not an emergency service, but calls and emails will be followed up as soon as possible.You can also report a rough sleeper through the national [www.streetlink.org.uk](http://www.streetlink.org.uk) website or call StreetLink on 0300 500 0914.If you believe a rough sleeper’s health is in immediate danger, please call 999. Officers could develop a more comprehensive strategy in terms of how it engages with people experiencing homelessness and other stakeholders, on a wide range of issues that impact their lives, not only the LC policy. |
| **Recommendation 24:**  That the Leader considers appointing a City Executive Board member with exclusive responsibility for Homelessness to provide public clarity on board member roles and raise the profile of the issue, given the increasing funding and support being offered in this area. | This is a matter for the Leader of the Council |
| **Recommendation 25:**  That the Board Member responsible for Homelessness considers attending the quarterly contract management meetings of the largest supported accommodation provider(s) commissioned by the Council. | The Portfolio holder would be welcome to attend or officers could provide a quarterly summary of all SLA performance returns from each funded service. |