

# No Local Connection Review Group Report for City Executive Board - Wednesday 14 November 2018

7. Scrutiny Committee Reports (Pages 3 - 56)

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**To:** City Executive Board  
**Date:** 14 November 2018  
**Report of:** Scrutiny Committee  
**Title of Report:** Report of the No Local Connection Review Group

<b>Summary and recommendations</b>	
<b>Purpose of report:</b>	To present the recommendations of the Scrutiny Committee's No Local Connection Review Group
<b>Key decision:</b>	No
<b>Scrutiny Lead Members:</b>	Councillor Andrew Gant, Chair of the Scrutiny Committee Councillor Nadine Bely-Summers, Chair of the No Local Connection Review Group
<b>Executive Board Member:</b>	Councillor Linda Smith, Board Member for Leisure and Housing (Tackling Homelessness and Improving the Private Rented Sector)
<b>Corporate Priority:</b>	Meeting Housing Need
<b>Policy Framework:</b>	Housing and Homelessness Strategy 2018-21
<b>Recommendation: That the City Executive Board states whether it agrees or disagrees with the 25 recommendations in the report of the No Local Connection Review Group (Appendix 1)</b>	

<b>Appendices</b>	
Appendix 1: Supporting Rough Sleepers with No Local Connection – Report of the No Local Connection Review Group	
Appendix 2: Draft City Executive Board response to the recommendations of the No Local Connection Review Group tabled by the Board Member for Leisure and Housing <i>(to follow as a separate supplement)</i>	

1. The Scrutiny Committee established the No Local Connection Review Group in July 2018. The report of the No Local Connection Review Group was presented to the Scrutiny Committee at a meeting on 6 November 2018 for their agreement to submit the report to the City Executive Board. The Committee also received written advice and comments from the Housing Strategy and Needs Manager on behalf of

the Head of Housing Services, in relation to the recommendations made by the Review Group.

2. Before discussing the report the Scrutiny Committee heard contributions from the following speakers:
  - a. Cllr Nadine Bely-Summers, Chair of the No Local Connection Review Group;
  - b. Cllr Shaista Aziz, member of the No Local Connection Review Group;
  - c. Monica Gregory, a member of the public with experience of homelessness;
  - d. Cllr Richard Howlett, member of the No Local Connection Review Group;
  - e. Cllr Craig Simmons, member of the No Local Connection Review Group;
  - f. Nerys Parry, Housing Strategy and Needs Manager.
3. The Committee thanked all the speakers and in particular, Monica Gregory, for speaking about personally experiencing homelessness after fleeing domestic violence and being deemed to have no local connection to Oxford, despite having been born and raised in the City.
4. The Committee thanked the Review Group for their work, the quality of their report and for articulating the views of rough sleepers. The Committee discussed the report at length. The full record of the discussion can be found in the draft minutes of that meeting.
5. Some concern was expressed that certain points of law and fact presented in the officer advice did not appear to be addressed in the Review Group's report; specifically the advice from the Housing Strategy and Needs Manager on recommendation 13b that it is not possible under the law for time spent in prison, hospital or rehab to be discounted when calculating a person's residency connection in relation to the Housing Allocations Scheme. In response, the Committee heard from members of the Review Group that officers had been involved in several of the Review Group's meetings and that their advice had been properly considered. The officer advice on recommendation 13b was considered to be a matter of local interpretation and it did not align with advice provided by Shelter on the application of local connection criteria.
6. Some concern was also expressed that relaxing the local connection criteria without increasing capacity within the Adult Homelessness Pathway or improving opportunities for move on at the end of the Pathway could create false expectations amongst rough sleepers, and risk creating a 'magnet effect' which could serve to compound the issues of rough sleeping in Oxford.
7. The Committee heard from members of the Review Group that there was no robust evidence to suggest that a 'magnet effect' would occur as a result of the Review Group's recommendation. They suggested that the starting point should be to agree the principles of what the Council wants to achieve and understand the level of demand, and then to look at resourcing, drawing on national funding streams where possible. Views were also expressed by Committee members about the need for a paradigm shift from considering people who are homeless as a problem, to considering their potential to contribute to the City, in light of their skills and diversity. This culture change would accordingly limit any concerns of a 'magnet' effect.

8. In response to questions, the Committee also heard from the Review Group that there were significant savings to the public purse that could be experienced by broadening the local connection criteria, particularly for the most entrenched rough sleepers. Savings could be expected in the criminal justice system, healthcare and housing services, as set out in the report.
9. The Committee agreed a proposal to endorse the report and submit it to the City Executive Board on 14 November 2018.
10. The City Executive Board is asked to agree its response to the 25 recommendations in the Review Group's report. A draft response submitted by the Board Member for Leisure and Housing will be circulated separately as Appendix 2. The implementation of any agreed recommendations will be monitored by the Scrutiny Committee in the normal way.

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# Supporting Rough Sleepers with No Local Connection

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**Report of the No Local Connection Review Group**  
Commissioned by Oxford City Council's Scrutiny Committee

November 2018

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## Foreword by the Chair of the No Local Connection Review Group



The No Local Connection Review Group originated from hours of volunteering and numerous meetings with campaign groups and homeless charities. It came about from acute concerns from the general public bearing witness to the misery of our most vulnerable citizens sleeping out in the streets throughout a long and harsh winter.

The rising levels of homelessness experienced nationally have been shaped by public policy choices concerning housing supply, affordability, welfare cuts and eligibility for housing assistance. There has been further impact in Oxford due to reductions in national and county-level funding and average house prices being unaffordable.

Policy decisions can cause, prevent or resolve homelessness. Since austerity took hold a decade ago, homelessness has increased in the UK by 169% and by more than 400% in Oxford in half that time (based on November 2017 data). In Oxford, there has been an increase in the number of people sleeping rough with no local connection (as currently defined), with 69% of all people counted in 2017 having no identifiable connection to any of the Oxfordshire districts. As Oxford City Council applies a Local Connection approach to most of its accommodation based commissioned services, these people will not be offered somewhere permanent to live, or be able to access a full pathway of support.

The Homeless Reduction Act took effect in April 2018 which brought about more responsibilities for local councils. Within this new context the Review Group carried out an in depth review, the first of its kind, into the specific impact the Local Connection Policy has on people without a local connection. The review has been very positive, stimulated lots of debate and shed light into this complex social and political issue. It also created links among the various stakeholders who passionately want homelessness to end.

The Review Group has presented a total of 26 recommendations for the Scrutiny Committee's endorsement, and hopefully the backing of the City Executive Board. I would in particular like to highlight the Review Group's request for the local connection criteria to be extended to be more realistic about how and when people have established a local connection; a view that was supported widely by contributors to this review.

I want to thank all members of the Review Group for their contributions. In particular, special thanks go to Councillor Richard Howlett for facilitating the meeting with people experiencing homelessness, Councillor Shaista Aziz for her important work on female homelessness and Councillor Craig Simmons for accompanying me on the visit to Croydon. I can't thank them enough for their excellent contributions and dedication. I also want to thank Stefan Robinson, our Scrutiny Officer, who compiled this report for his outstanding contribution.

I would like to give a big thank you to our council officers and to all our guests who contributed their time freely to provide evidence and make this review possible. I would also like to thank the Gatehouse who provided an open and inclusive space so that our guests with lived experiences of homelessness were able to speak freely.

I hope this crucial work will bring about beneficial changes that make a tangible difference to the lives of some of our most vulnerable residents.

**Councillor Nadine Bely-Summers, Chair of the No Local Connection Review Group**

# Chapter 1: Introduction

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1. The role of Oxford City Council's Scrutiny Committee is similar to the role of UK Parliamentary Select Committees. Scrutiny is led by councillors who are not on the City Executive Board (the main council decision making body) and is empowered to question council decision makers and make recommendations to them about policy decisions. Scrutiny can also investigate any issue that affects the local area or its residents, whether or not it is the direct responsibility of the Council.
2. The Scrutiny Committee established the No Local Connection Review Group in July 2018 to investigate concerns regarding the increasing number of people sleeping rough in Oxford without a deemed local connection to the area. The Council's Corporate Plan sets out an ambition that there will be fewer rough sleepers and homeless people, and despite receiving the National Practitioner Support Service 'Gold Standard' award in recognition of its efforts to tackle homelessness, the number of people rough sleeping has continued to rise at a greater rate than the national average.
3. Critically, the vast majority of people living on the City's streets are not considered to have a local connection to the area, which would otherwise enable them to access the Council's Commissioned Adult Homeless Pathway. The Scrutiny Committee tasked the Review Group to engage with partners to examine the Council's Local Connection Policy, and develop recommendations for the Council that might improve or broaden the level of support available to rough sleepers without a local connection.
4. The review also aims to shed light on the impact that recent national and county level cuts to services have had in reducing the provision of appropriate wrap-around support services, and wider mental health services. The delivery of these wider services is vital in providing longer term personable support to help people remain in stable housing.
5. Further uncertainty around future funding from these bodies will likely place greater pressures on maintaining a throughput of people in the Adult Homeless Pathway, and this in itself is worthy of a full review. In this context, the Review Group understand that the Local Connection Policy is just one aspect of this area of work, and the recommendations in this report are not presented as a panacea for tackling homelessness altogether.
6. The Review Group has cross-party membership comprising of the following City Councillors:
  - Councillor Nadine Bely-Summers (Chair)
  - Councillor Shaista Aziz
  - Councillor Paul Harris
  - Councillor Richard Howlett
  - Councillor Tom Landell-Mills
  - Councillor Craig Simmons
7. The purpose of this report is to set out in detail the work undertaken by the Review Group, together with their conclusions and recommendations. Each recommendation is supported by an evidence base gathered from a wide variety of sources as part of the Review Group's work. In producing this report, the Review Group considered:

- a) Evidence submitted by nine Council Officers
  - b) Evidence submitted by 13 local authorities
  - c) Evidence submitted by 13 local frontline service professionals
  - d) Evidence submitted by two national policy experts
  - e) Evidence submitted by 18 people currently experiencing Homelessness
8. The Review Group would like to place on record its thanks to all of the people who contributed to the review, which have enabled the recommendations in the report to be made.

## Chapter 2: Methodology

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9. The Review Group's work involved seven meetings between July 2018 and October 2018. The aim of this work was to evaluate the specific impact of the current Local Connection Policy on those without a local connection, and determine what opportunities were available for improving services to those individuals. Key themes the Review Group sought to explore, as set out in its scoping document (**Appendix 1**), included:
- Existing service provision for rough sleepers without a local connection
  - How homelessness services are funded
  - The reconnection process for those without a local connection.
  - The implications of relaxing the Local Connection Policy.
  - National best practice and the legal background to homelessness prevention
  - Fact checking misconceptions about the provision of services.<sup>1</sup>
10. The Review Group's findings and recommendations have been informed by verbal and written evidence provided by a range of witnesses including people experiencing homelessness, other local authorities and national and local policy experts. Their verbal and written testimony, together with the Review Group's own research, support the conclusions and recommendations made.
11. The Review Group's seven meetings considered a range of evidence from internal and external policy experts, services providers and service users. Contributors to the review included:
- 13 local authorities<sup>2</sup> and up to 18 people experiencing homelessness<sup>3</sup>
  - Matthew Downie, Crisis National Director of Policy and External Affairs
  - Professor Nicholas Pleace, Centre for Housing Policy
  - Kate Cocker, Director of Crisis Skylight Oxford
  - Rob Rogers, ACT Outreach Team Manager
  - Richard, ACT Housing Support Officer
  - Dr James Porter, Luther Street Medical Centre
  - Yvonne Pinner, Oxfordshire Community Foundation
  - Sue Jackson, Oxford Street Population Outreach Manager
  - Elizabeth Edwards, the Big Issue and Homes4All Oxfordshire
  - Paul Roberts, Aspire Oxfordshire
  - Paul Read, Aspire Oxfordshire
  - Boo Sagoo Davies, Aspire Oxfordshire
  - Jan Bailey – Gimme5
  - Claire Dowan, Homeless Oxfordshire
  - Charlotte Blake, Homeless Oxfordshire

The content of the seven meetings held by the Review Group are set out in **Appendix 2**:

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<sup>1</sup> Oxford City Council No Local Connection Review Group, 2018. Review Scope. Available at: <http://mycouncil.Oxford.gov.uk/ieListDocuments.aspx?CId=513&MId=4992&Ver=4>

<sup>2</sup> Oxford City Council No Local Connection Review Group, 2018. External Contributions. Available at: <http://mycouncil.Oxford.gov.uk/ieListDocuments.aspx?CId=513&MId=5035&Ver=4>

<sup>3</sup> Oxford City Council No Local Connection Review Group, 2018. Homelessness Focus Group Report. Available at: <http://mycouncil.Oxford.gov.uk/ieListDocuments.aspx?CId=513&MId=5036&Ver=4>

# Chapter 3: Homelessness and the Local Connection

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## The National Context

12. Local Authorities in England were until recently required under the Housing Act 1996 to secure accommodation for unintentionally homeless households who are considered to be in 'priority need'. This excluded homeless couples without children and single people. Recently, with the introduction of the Homelessness Reduction Act 2017, local authorities are now required to help all eligible households at risk of losing accommodation, regardless of whether they are in priority need or considered to be intentionally homeless.
13. Whilst official statistics and recording practices continue to be disputed by organisations including Crisis and Shelter, there is a clear indication that rough sleeping cases, the most dangerous form of homelessness, have risen dramatically over the past decade. This trend has been seen most prominently in the South East, in alignment with the increasing unaffordability of housing in the region.
14. Official estimates of rough sleepers have risen every year since 2010, and in 2017 there were understood to be 4751 people sleeping rough in England.<sup>4</sup> However, several charities estimate the number to be more than double this figure<sup>5</sup>. The number of families in temporary accommodation has also risen significant from 50,000 in 2010 to 78,000 in 2017. A similar rise can be seen in the number of children nationally who are in temporary accommodation.<sup>6</sup>
15. Together with a myriad of structural and personal circumstances that can lead to homelessness, the National Audit Office recently identified a particular challenge in relation to the Government's approach to welfare reforms:

*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 (p. 10).<sup>7</sup>*

16. There is general consensus among the research community that "A country with more social housing, more generous welfare systems, more generous health provision has less homelessness, less poverty than one that does not."<sup>8</sup> Importantly, solving the homelessness crisis is best addressed through partnership working focussed on providing appropriate resources and integrating support systems offered by regional and national governments and public service providers.

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<sup>4</sup> Homeless Link, 2018. Rough Sleeping: Explore the Data. Available at: <https://www.homeless.org.uk/facts/homelessness-in-numbers/rough-sleeping/rough-sleeping-explore-data>

<sup>5</sup> House of Commons Committee of Public Accounts, 2017. Homeless households: eleventh report of session 2017-2019. House of Commons.

<sup>6</sup> The Guardian, 2017. More UK children homeless or in temporary housing than during the crash crisis. Available at: <https://www.theguardian.com/society/2017/dec/06/more-children-homeless-or-in-temporary-housing-than-during-crash-crisis>

<sup>7</sup> National Audit Office. Homelessness, 2017. Available at: <https://www.nao.org.uk/wp-content/uploads/2017/09/Homelessness-Summary.pdf>

<sup>8</sup> Pleace, 2018. Women and Homelessness: key messages from research in Europe. European Observatory on Homelessness. (p.9)

17. This is not an issue that one local authority can solve on its own. Cuts to support services have been significant in recent years, including cuts to: Housing Benefit, the Supporting People Fund, mental health, social care, police and probation services. There have also been a similar number of challenges presented by the gradual roll out of Universal Credit. Accordingly, a recent study published in the British Medical Journal explains that “Austerity policies have meant that, since 2010, the funding available for supporting vulnerable people with their housing has been cut by 59% in real terms.”<sup>9</sup>
18. The Communities and Local Government Select Committee’s inquiry into homelessness in 2016 found that the level of service offered to homeless people and those at risk of homelessness varied significantly across local authorities,<sup>10</sup> highlighting the discretionary nature of the homelessness support offer at a local level. Following a separate inquiry by Crisis, the Committee concluded that there was a greater need for preventative work in supporting those at risk of homelessness. This perspective contributed to the development of the recent Homelessness Reduction Act 2017, which extends the duties owed by local authorities to those at risk of homelessness from 28 days to 56 days.
19. The Government recently pledged to end rough sleeping by 2027. However, structural pressures continue concerning housing affordability and availability, reductions in welfare benefits, and a rise in zero hours employment contracts. The House of Commons Public Accounts Committee noted that “Welfare reforms have reduced the value of housing benefit paid to lower income families to subsidise housing costs;”<sup>9</sup> a challenge that is most significant in the context of Oxford’s housing market.
20. Whilst estimates continue to change, Crisis estimates that:
- 83% of rough sleepers are men,
  - 41% of rough sleepers have served a prison sentence
  - 15% are non-UK nationals
  - The average age people become homeless is just 22<sup>11</sup>

## The Local Context

21. Oxford is widely cited as the most unaffordable city in the UK in which to live. Compared to 54 other cities in the UK, Oxford has the highest average house prices in the country when compared to local earnings. The average house price is 16.7 times higher than the average annual earnings,<sup>12</sup> which is more than double the average ratio in all other cities within the UK. Oxford also has the highest percentage (30%) of residents living in private rented accommodation (this is partly attributable to the large student population).
22. The Homelessness Act 2002 requires that all local authorities have a strategy in place which sets out their housing vision, how it will prevent and tackle homelessness, and meet housing need in the area. As part of this duty, Oxford City Council agreed in January 2018 to adopt a new 2018-21 Housing and Homelessness Strategy. The

<sup>9</sup> Fransham, M. and Dorling, D, 2018. Homelessness and public health, The British Medical Journal. (p.3)

<sup>10</sup> Communities and Local Government Committee, 2016. Homelessness. Third Report of Session 2016-17.

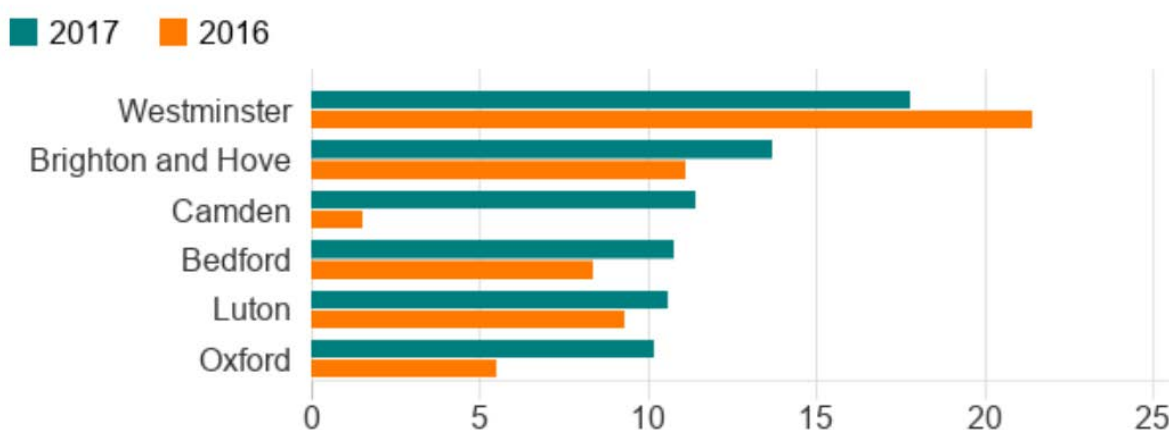
<sup>11</sup> Crisis, 2014. Nations Apart? Experiences of single homeless people across Great Britain. Available at: [https://www.crisis.org.uk/media/20608/crisis\\_nations\\_apart\\_2014.pdf](https://www.crisis.org.uk/media/20608/crisis_nations_apart_2014.pdf)

<sup>12</sup> Financial Times, 19 January 2018. How One London Neighbourhood is worth more than Liverpool. Available at: <https://www.ft.com/content/5abfee38-f634-11e7-a4c9-bbdefa4f210b>

Strategy aims to help all interested parties to understand what the Council is trying to achieve and how it intends to work with a broad range of partners to tackle the breadth of housing and homelessness challenges being faced by the City.

23. The City Council’s official street count of people sleeping rough, which uses a nationally recognised methodology for counting, identified that in November 2016 there were 33 people sleeping rough, a slight decrease from 39 in November 2015. However, in November 2017, the street count identified 61 people sleeping rough. Overall there has been a 400% increase in the number of people sleeping rough since 2012 (see Figure 2). The Council recognises however that the actual number of people sleeping rough on one specific night could be higher. The Council therefore carries out an estimate of rough sleepers which is monitored by Oxfordshire’s Health and Wellbeing Board. In November 2017 the estimated street count in the City was 89.<sup>13</sup>
24. Over the course of 2017/18, 536 different people were verified as rough sleeping in Oxford, 301 of which were verified for the first time. Successful interventions were made with 304 individuals, supporting and enabling 283 people to access the sit-up service, hostel or other accommodation (some of the 283 people may have accessed more than once and more than one type of accommodation).<sup>14</sup> Nationally, Oxford continues to be recognised an area with high rates of homelessness, as illustrated in the graph below.<sup>15</sup>

**Figure 1: Areas with Highest Rates of Rough Sleepers per 10,000 households**



69% of the rough sleepers identified in the City’s 2017 street count did not have an identifiable or known connection to any one of the local authorities in Oxfordshire.<sup>16</sup> At that proportion, scaled up across the year for the amount of people recorded as rough sleeping, it could be estimated that approximately 370 (of 536) people who slept rough in 2017/18 did not have an identifiable local connection to Oxfordshire. Of those, only 19 were successfully reconnected to another area.<sup>14</sup> 21% of the City’s street count had an identifiable local connection to one of the other district councils in the County. 10% had an identifiable local connection to Oxford City. Due to the chaotic and transient nature of rough sleeping, many do not have a tangible connection to anywhere, making access to support services and accommodation very difficult.<sup>16</sup>

<sup>13</sup> Oxford City Council Housing and Homeless Strategy Evidence Base, 2018.

<sup>14</sup> Oxford City Council, 2018. Housing Needs Performance: How did we do? Available at: [https://www.oxford.gov.uk/download/downloads/id/4809/housing\\_needs\\_performance\\_2017-18.pdf](https://www.oxford.gov.uk/download/downloads/id/4809/housing_needs_performance_2017-18.pdf)

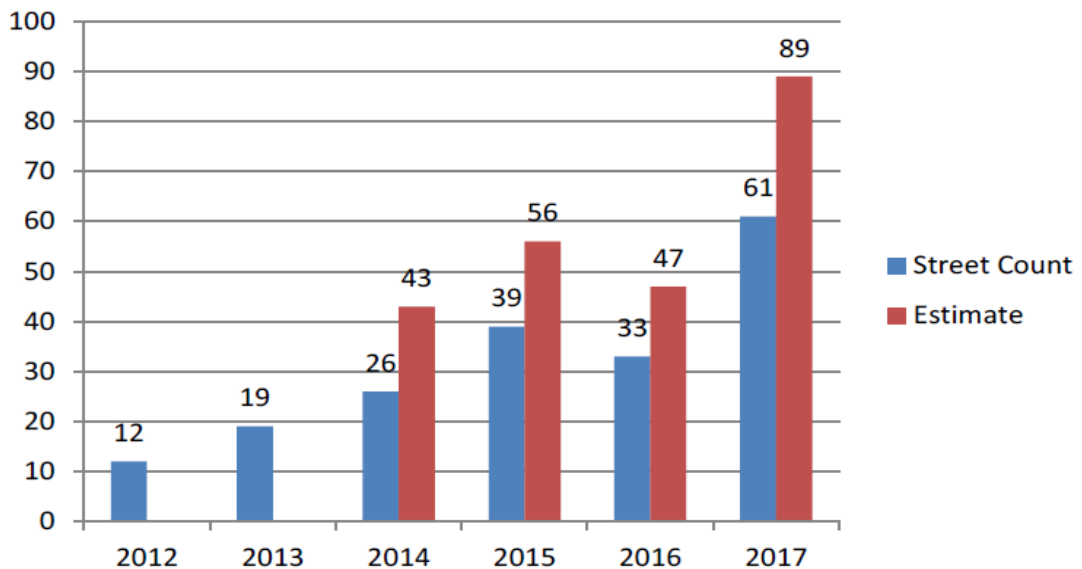
<sup>15</sup> Ministry for Housing, Communities and Local Government. 2017. Rough Sleeping Statistics Autumn 2017.

<sup>16</sup> Oxford City Council Housing and Homelessness Strategy 2018 – 21, 2018.

25. Data gathered from the November 2017 City Conversation event shows:
- 21 people known at the time of the count had no connection to Oxfordshire,
  - 12 had rough slept in the city for over 1 year.
  - 61 people were identified as sleeping rough on the night of the count,
  - 55 people found were already known to services
  - Most had high level support needs including 25 who had mental ill health issues (10 of these 25 known drug users), 24 who misuse drugs, and 20 alcohol.
  - 22 had slept rough in the City for over 6 months
  - The Oxford Street Population Outreach Team (OxSPOT) recorded 243 rough sleepers between July 2017 and September 2017.<sup>17</sup>

26. The common perception of homelessness tends to be about individuals seen sleeping rough. However, homelessness is a complex issue which affects individuals and families, and much of the good work that goes on is rarely seen by the public. There are numerous reasons why people may lose their home which is often through no fault of their own.

**Figure 2: Council’s official street count and estimate of rough sleepers 2012-2017**



27. Most recently in September 2018, there was a notable decline in the number of people counted as sleeping rough. The cross- service count team counted 36 people as being bedded down, under the same methodology as used in November 2017. This is nearly half the level observed in the previous year. Of these 36 people, 6 had no local connection, 8 had an unknown connection, 5 were being investigated for their connection and 3 had connections to other place in the UK. This represents a total of 19 of 36 people (61%) having no confirmed local connection to Oxfordshire.

28. Locally, since 2014/15, the most common causes of homelessness (loss of last settled accommodation) for accepted homelessness applications have been the loss of rented accommodation (where the main reason is the ending of an Assured Shorthold Tenancy), followed by family and friends no longer being willing or able to accommodate, and thirdly, relationship breakdown. The groups most at risk of homelessness include: young people leaving the care of a local authority; those leaving

<sup>17</sup> City Conversation, 2017. Rough Sleeping Data. Available at: <https://cityconversation.org/rough-sleeping-data/>



prison; people suffering from domestic violence, a mental health problem, or substance or alcohol misuse problems.<sup>16</sup>

29. The City Council recently supported the establishment of the City Conversation event and steering group in recognition that that the homelessness issue cannot be solved by one organisation alone. The City Conversation is a key forum in which to provide a partnership led response and importantly find other funding sources for new services, rather than relying solely on the Council for funding a wide range of services.

## **Defining a Local Connection**

30. Having a local connection to Oxford guarantees one's entry into the Adult Homeless Pathway, and the Housing Register (to access social housing). In order to access the Adult Homeless Pathway and the Housing Register, an individual must meet local connection criteria as set out in the Oxfordshire Adult Homeless Pathway Common Operational Protocol and the Housing Allocations Scheme respectively. At present, the definition of a local connection is broadly aligned in both of these policies.
31. Oxfordshire District Councils have agreed to establish a common definition and process for determining a Local Connection for access to the Adult Homeless Pathway, which is referred to as a pathway connection. This is a less strict set of criteria than the local connection as defined in legislation. Individuals will also need to be in receipt of benefits (and so have recourse to public funds). The purpose of the Adult Homeless Pathway is to offer people a course of progression through services to enable them to secure long term social housing or other move-on opportunities. Some commissioned services can be accessed by people without a local connection or recourse to public funds, including a sit-up service (where the individual is engaging with services) and day centre services.
32. The Council has a duty to support those individuals that are considered to have a local connection, as defined in section 199 of the Housing Act 1996 and the Homelessness Reduction Act 2017. The Act considers an individual to have a local connection with a local housing authority "if they have a connection with it:
- a) because he is, or in the past was, normally resident there, and that residence is or was of his own choice,
  - b) because he is employed there,
  - c) because of family associations, or
  - d) because of special circumstances."
33. According to Shelter, residence is defined as being a 'residence of choice' in an area for at least 6 months, and street homelessness may be considered grounds for normal residence.<sup>18</sup>
34. To help coordinate prevention and relief work across Oxfordshire, the six Oxfordshire Councils have developed the Oxfordshire Common Operational Protocol. This document sets out the criteria that must be met before individuals can be considered to have a local connection, and therefore enter the Adult Homeless Pathway. Importantly,

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<sup>18</sup> Shelter, 2018. Local Connection. Available at: [http://england.shelter.org.uk/legal/homelessness\\_applications/local\\_connection#\\_ednref14](http://england.shelter.org.uk/legal/homelessness_applications/local_connection#_ednref14)

local authorities owe a duty to any person who is deemed to have a connection to an area under section 199 of part 7 of the Housing Act 1996. Shelter (2011) explains:

*If you are homeless, eligible for assistance, in priority need, not intentionally homeless, and have a local connection, the council owes you the full housing duty. It must continue to accommodate you until it provides you with, or finds you, settled accommodation.*<sup>19</sup>

35. The 1996 Housing Act sets out the reasons someone can be considered to have a local connection, and the Oxfordshire the Common Operational Protocol provides more detail on how the legislation will apply in Oxfordshire. This is paraphrased below:

**Residency** – Evidence of living at an address within the local authority boundary as their main and principal home (6 out of the last 12 months or 3 out of the last 5 years). Time spent rough sleeping/sofa surfing, in the Single Homeless Pathway, in rehab, in prison or in hospital, in a bail hostel or other supported accommodation, is not considered grounds for a Pathway Connection.

**Close Relatives** – Having a connection is restricted to a Mother, Father, Sister, Brother or adult children. Relatives need to have lived in the area for a minimum of 5 years and there must be frequent contact, commitment and dependency immediately prior to the application.

**Employment** – To establish a connection via employment this needs to be a paid permanent job i.e. not transient, nor very occasional.

**Exemptions** – There are specific exemptions for individuals that do not have a local connection, in circumstances where:

- There is a clear connection to the County, but they have lived in different areas
- It would be unsafe for someone to return to an area they are connected with
- Rough sleepers are exempt under a military covenant
- The client is a care leaver
- The client has no local connection to any other local authority area.

36. The Homelessness Code of Guidance for Local Authorities explains however that “Referrals are discretionary only, and housing authorities are not required to refer applicants to other authorities.” In these circumstances, local authorities are given the discretion to choose to provide services for those they do not refer. However, within the context of the limited local government finance envelope, all UK authorities currently seek to reconnect people to other local authority areas, where there is a clear connection, and it is safe and appropriate to do so. A 2015 Crisis report suggested however that:

*A much broader debate needs to be had as regards the appropriateness of using the Code of Guidance local connection criteria to restrict rough sleepers’ eligibility for accommodation and other building based services.*<sup>20</sup>

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<sup>19</sup> Shelter, 2011. *Do I have a Local Connection?* Available at: <https://www.rbc-homes.org/choice/uploads/doihavealocalconnection.pdf>

(p.1)

<sup>20</sup> Crisis, 2015. *The Reconnection of Rough Sleepers within the UK.* (p.xiii)

37. Under the current Common Operational Protocol, “reconnection will be discussed assertively with all people [rough sleepers] within the scope of this policy.”<sup>21</sup> Nationally, reconnection policies vary significantly, which means that the criteria used to assess whether an individual has a better connection with one area over another is inconsistent. The same variations can also be seen in the way that local authorities define intentionality criteria.<sup>22</sup> The same report also criticises how local authorities vary the definition of ‘priority need’ status, which Shelter suggests is driven by the level of resources available, rather than a national consensus on how ‘priority need’ is applied.

38. Within the Oxfordshire Common Operational Protocol, any person deemed by the Outreach Team as being a rough sleeper will be assessed, including whether they have a local connection to the area.

*If a client does not co-operate with the assessment and or reconnection process and an assessment therefore cannot be completed, the client may not be able to use O’Hanlon House day services and/or use the ‘sit-up service’ (excluded form services) or any services as applicable in District authorities (p.31).<sup>21</sup>*

39. Where rough sleepers do not have a local connection to the county, an alternative service offer will be developed which reconnects them to an area where they do have a local connection. Provision for a sit-up-service will be made whilst a reconnection is made. The Common Operational Protocol explains:

*Clients who already have secure accommodation in another area will be given 24 hours from when outreach teams have clarified that it is deemed safe and appropriate, to return. They will then be excluded from services (p.33).<sup>21</sup>*

40. This practice is identified as common among local authorities.<sup>20</sup>

## **International Perspectives**

41. The European Observatory on Homelessness (EOH) carried out a research study into the application of local connection criteria across Europe as a means of defining access to support services. The report explains that local connection criteria are used widely across Europe to define who receives what level of support.<sup>23</sup> However, local connection criteria are defined and applied with varying levels of strictness. For the most part, the UK is seen to have significant local authority control over local connection rules, compared to other European countries. This has resulted in a wide variation of policies and a ‘postcode lottery’ for people that are homeless.

42. The EOH highlights that the UK’s social housing supply is so acute, that in some areas, there is evidence of maladministration of the homelessness laws, with entitled applicants turned away because little social housing is available. The lack of social housing has led to what the EOH defines as extreme interpretations of English law, where rough sleepers, squatters, prisoners and those in temporary accommodation are not considered to have a local connection, despite having been within the local authority boundaries for an extended period of time.

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<sup>21</sup> Oxfordshire Adult Homeless Pathway Common Operational Protocol, 2018. Unpublished.

<sup>22</sup> Shelter, 2007. Policy Report: Rights and Wrongs. Available at:

[http://england.shelter.org.uk/data/assets/pdf\\_file/0015/48012/Briefing\\_Rights\\_and\\_Wrongs\\_Nov\\_2007.pdf](http://england.shelter.org.uk/data/assets/pdf_file/0015/48012/Briefing_Rights_and_Wrongs_Nov_2007.pdf)

<sup>23</sup> European Observatory on Homelessness, 2015. Local Connection Rules and Access to Homelessness Service in Europe.

43. Residence in an institutional setting (such as hospital, rehab and prison) within a UK local authority area is often not taken as evidence of a local connection, which is different to how some European countries operate. However, many of the European countries that give more concessions in defining a local connection are not in the grip of a housing crisis in the same way as England, notwithstanding the pinnacle of unaffordability that is Oxford. More broadly, the challenge of rising homelessness is a pan-European issue, with Finland being the only country to reduce homelessness in recent years; widely attributed to nationwide investment in the housing first principle.
44. The EOH report asserts that complex local connection criteria can often obstruct fast reconnections, access to essential services and be expensive. However, the EOH balances this position by recognising the benefits of local connection criteria:

*[Local connection criteria] provide a mechanism for preventing the abuse of public resources through 'freeloading'. They can provide a protection for localities which decide to offer a high level of social support from having to bear the social costs of neighbouring areas which, for instance, reduce local taxes by refusing to invest in such services. But they are also a way of rationing access to accommodation and support (p.5).<sup>23</sup>*

45. The report concludes by recommending that local connection criteria take account of the support needs of those who are most vulnerable and at risk:

*Suspending local connection requirements for high need groups, particularly long-term and recurrently homeless people with significant support needs, may be the simplest solution... suspending or abolishing local connection rules under certain circumstances may be the best way forward (p.63)... Many homeless people whose homelessness is sustained or recurrent, and who are most likely to have high and complex support needs, may be least likely to be able to demonstrate a local connection and quite often face barriers to emergency accommodation (p.59).<sup>23</sup>*

46. However, this conclusion has been made in the context of an international study, and its recommendations may be more or less applicable to specific countries. Importantly, within the UK context of a severely restricted housing supply, and the consequent unaffordability of housing, the enforcement of a prioritised support scheme through stricter local connection rules can serve to manage 'priority' need, within the context of limited resources.

## **Homelessness: The Risks**

47. Rough sleepers are much more likely to suffer ill-health and violence than the wider population.<sup>24</sup> According to the Homeless Health Needs Audit:

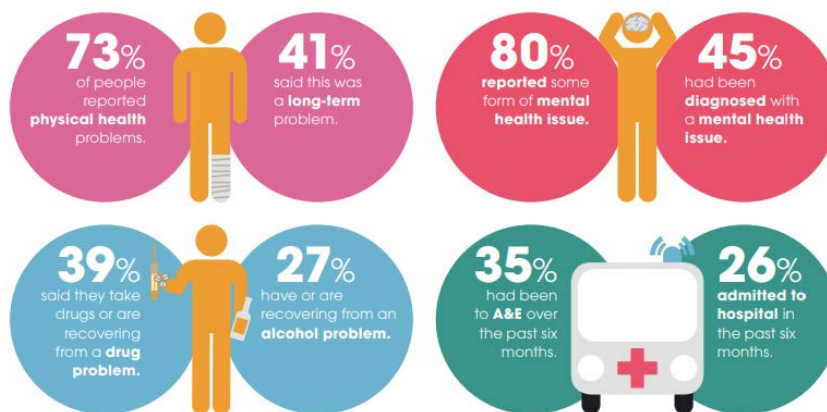
- 86% of rough sleepers reported having a mental health issue
- 41% reported recovering from an drug problem
- 27% reported recovering from an alcohol problem.<sup>25</sup>

<sup>24</sup> Crisis, 2012. Homelessness Kills: An analysis of the mortality of homeless people in early twenty-first century England.

<sup>25</sup> Homeless Link, Homeless health Needs Audit. 2014. Available at: [https://www.homeless.org.uk/sites/default/files/site-attachments/Homeless%20Health%20Needs%20Audit%20toolkit\\_0.pdf](https://www.homeless.org.uk/sites/default/files/site-attachments/Homeless%20Health%20Needs%20Audit%20toolkit_0.pdf)

48. Other studies report significant variances in this data, such as higher levels of drug and alcohol dependency. However, there is consensus among the research community that rough sleepers suffer from significantly disproportionate addiction and dependency issues, and experience much higher health risks. These challenges, coupled with high risk living circumstances, are all matters that contribute towards the low life expectancy of a rough sleeper at just 47 years of age.<sup>24</sup> Between October 2017 and October 2018, a study found that 449 people in the UK had died whilst experiencing a period of homelessness, and significant number of which were sleeping rough.<sup>26</sup> Even once rough sleepers are housed, their housing conditions are often such that they remain at much higher risk of respiratory conditions, depression, anxiety and unintentional injury.<sup>9</sup>
49. Drug and alcohol abuse are particularly common causes of death among the homeless population, accounting for just over a third of all deaths. Suicide, traffic incidents and infections also pose an elevated risk to rough sleepers.<sup>27</sup> A national survey of outreach workers by St Mungo's in 2011 showed that relationship breakdown, domestic violence and mental health issues were the primary causes of rough sleeping, which only serve to exacerbate existing health problems.<sup>28</sup>
50. Dr Nigel Hewitt at Pathway Healthcare explains that "Homeless people in the UK do not die from exposure. They die from treatable medical conditions."<sup>29</sup> There is a common misconception that rough sleepers must have a fixed address to access GP services. This is not the case, and one's immigration status is also irrelevant. Organisations such as the Healthy London Partnership and Groundswell have worked to deliver educational programmes about this fact, to encourage people who are homeless to access local health services. Luther Street Medical Centre in Oxford is an award-winning GP surgery that has a history of providing healthcare to people experiencing homelessness.

**Figure 3: Homeless Health Check (Homeless Link Health Audit Results 2014)<sup>25</sup>**



### Funding for Homelessness services in Oxford

51. On 19 February 2018 Oxford City Council agreed its Budget and Medium Term Financial Plan for the period 2018-19 to 2021-22 which included a base budget for homelessness services of £941k per annum. A further commissioning budget was also

<sup>26</sup> BBC, 2018. Homeless Deaths: At least 449 reported in the past year. Available at: <https://www.bbc.co.uk/news/uk-45797223>

<sup>27</sup> NHS, 2011. Homeless die 30 years younger than average. Available at: <https://www.nhs.uk/news/lifestyle-and-exercise/homeless-die-30-years-younger-than-average/>

<sup>28</sup> St Mungos, 2011. Battered, broken, bereft: Why people still end up sleeping rough. Available at: <https://www.mungos.org/wp-content/uploads/2017/07/2011-Battered-Broken-Bereft-report.pdf>

<sup>29</sup> 80 Pathway, 2018. Pathway Services. Available at: <http://www.pathway.org.uk/about-us/>

made available from the Council's own grant budget of £442,279. The budget for 2018/19 was further enhanced by £161,700 allocated from reserves, accumulated from 2016/17 to support the Council's participation in the countywide Adult Homeless Pathway.

52. The strategic framework within which these funds are allocated remains the same, providing a total budget for 2018/19 of approximately £1,834,853; a total increase of approximately £100,000 on 2017/18. The City Council also has an ear-marked homelessness reserve which could be draw down as needed, which was projected to be in the region of £800,000 by March 2019, from the February 2018 budget. However, this money can only be spent once and should not be used to sustain services.
53. Supported accommodation for rough sleepers and single homeless people has historically been funded by Oxfordshire County Council through Housing Related Support funds (formerly Supporting People). In February 2016, Oxfordshire County Council made a decision to cut their Housing Related Support Funds by 100%, starting to implement phased cuts from 1 April 2017, with no further funds available from 1 April 2019.
54. In response, the six Oxfordshire councils and the Oxfordshire Clinical Commissioning Group agreed to enter into a pooled budget arrangement in order to preserve some of the supported accommodation for rough sleepers and single homeless people. All parties are contributing financially to the pooled budget over the period 1 April 2017 to 31 March 2020. The European Commission on Homelessness highlights that these types of pooled systems help mitigate against barriers to accessing support services.
55. These new arrangements have required a reconfiguration of the co-ordination for access to the homeless pathway, as a certain number of bed spaces are now available to each local authority. From 1 April 2017 and going forward, rough sleepers and single homeless people will only be able to access accommodation that is funded by and for the local authority where the person has a confirmed connection.
56. It has been estimated that Oxford City needs at least 150 beds to meet demand, based on snapshot counts of use of the pathway from 2015 to 2017. Whilst there has been a significant increase in the number of people sleeping rough on the City's streets, a high proportion of these people do not have a local connection to Oxford City. They are therefore not eligible to access the Adult Homeless Pathway, and would not therefore be included in any needs assessment.
57. In June 2018, the Council was awarded £503,000 in Ministry for Housing, Communities and Local Government (MHCLG) funding to help prevent and reduce rough sleeping in the winter. The Council expressed its intention on receipt of these funds to support 64 new bed spaces for rough sleepers – including some beds for people who are not currently eligible for the homeless pathway. The funding will also be used to support the development of a multi-agency service hub in the City Centre, and additional staff posts within the Street Population Outreach Team. In addition to the £503,000 of MHCLG funding, the Council has most recently been awarded a further £511,000 for 2019/20, which is conditional on the successful delivery of the funded programme for 2018/19.

# Chapter 4: Findings and Recommendations

## Part 1: Redefining the Local Connection

### Broadening the Local Connection Exemption Criteria

58. As part of its research, the Review Group contacted 29 Local Authorities, initially with tailored emails about their local connection policies. This included a question on whether they would consider someone to have a local connection in circumstances where they had slept rough within their boundary for six or more months. The findings were weighted towards London borough authorities with unitary status and other large metropolitan cities, which were identified as having good practice. The purpose of this work was to understand how criteria varied across different authorities, and what support was in place to support people without a local connection.
59. Most of the 12 local authorities that responded said they took a discretionary approach to service provision for people who are homeless or rough sleeping. Local connection criteria were considered a useful tool for reconnecting people, resolving cross boundary disputes and prioritising service resources. In some cases where there was no local connection, it was often left to the discretion of a senior manager to decide what level of service should be offered. This approach was also championed by Croydon Council, which the Review Group visited as part of its work.
60. Discretion was applied to varying levels across the responding local authorities, but it often involved applying discretion to offer overnight accommodation, access to support pathways, and move-on support. The emphasis in the responses concerned getting people off of the street, before offering other services including reconnection.
61. Several local authorities were of the view that a strict ‘one-size-fits-all’ Local Connection Policy was not appropriate, and did not account for the diversity of needs and vulnerabilities experienced by people sleeping rough in particular. Whilst some said they would offer a local connection to people who had been sleeping rough for more than six months, others took what they described as a more ‘pragmatic’ approach.
62. Most suggested that each case must be considered on its own merits, with the health, safety and vulnerability of a rough sleeper being the priority. Colleagues from the Centre for Housing Policy also responded to the Review Group’s call for evidence, and they explained that not recognising six months sleeping rough as residency creates a backlog of people left on the streets, for which there are examples elsewhere in the UK.

*The priority is always to reconnect rough sleepers to an area where they have a better connection. However, outreach workers are given the discretion to judge whether someone should be entitled to supported accommodation, where it is clear that their poor health [mental, physical, addiction] and vulnerability, and the barriers to reconnection are so significant, that they need immediate support.*  
**London Borough, Supported Housing Commissioner**

63. Some local authorities said that local connection criteria can limit people’s ability to act in support of the most vulnerable. Many said that they did not have (or were not willing to

share) policy or guidance in this area, and instead tailored their support based on factors including:

- Someone's physical and mental health
- Someone's level of dependency on drugs and/or alcohol
- Someone's risk of experiencing violence
- Whether someone's rough sleeping habits were entrenched (which does not necessarily relate to the amount of time sleeping rough, but also attitudes)
- The barriers posed to reconnecting someone to another area

64. These criteria broadly align with the Review Group's perspective on cases that should be considered for exemption from the Local Connection Criteria.

*Whether someone has been on the streets for one day or six months is irrelevant in these circumstances. The level of time spent on the street does not equal the level of need. **London Borough, Supported Housing Commissioner***

*We operate a discretionary approach meaning we sometimes overlook an absence of local connection where a viable solution can be found. If someone has 6 months rough sleeping contacts in the City this would certainly be the case. **London Borough, Homeless Service Manager***

*There is no difference between the level of support between someone with a local connection based on more than 6 months in settled accommodation, and someone who has been rough sleeping in the area for 6 months. **London Borough, Homeless Manager***

*In the case of people having been frequently and consistently reported and recorded as rough sleeping on the streets for 6 months or over, it would be highly likely that they would gain a local connection and indeed there are numerous examples of that. **London Borough, Outreach Worker***

*London boroughs take a more practical case-by-case approach that is focussed on helping rough sleepers off the streets as quickly as possible – and that might mean helping some people with no clear connection to their area. **London Borough, Homeless Service Coordinator***

65. Exceptions can be made to the Local Connection Policy, particularly in 'special circumstances' as set out in the Homelessness Code of Guidance. One of the special circumstances specifically referenced by the Code concerns the need to be near specialist medical or support services. Given the concentration of specialist services including Luther Street Medical Centre and the John Radcliffe Hospital, the Review Group wish to emphasise the need to promote exemptions to the Local Connection Policy particularly on medical grounds.

*A 'full' local connection criteria based on the ability to prove a close and supportive family relationship or being named on a tenancy for a specific amount of time within recent years seems to discriminate against homeless people, especially if they have more complex or enduring issues – meaning they are even less likely to meet the criteria. **Staff Feedback from O'Hanlon House Hostel, Oxford***



66. The Review Group recognise that Oxford City Council employs discretion in its approach to accepting people without a local connection. However, members believe this could be more explicit within the Council's policies and better communicated to the public.

### **Critiques of the Local Connection Approach**

67. The UK is recognised as having a high degree of control over its local connection rules in comparison to other European countries.<sup>23</sup> The EOH report into cross-Europe local connection policies explains that the more vulnerable a person is, and the more support needs they have, the less likely they are to be able to provide evidence of a local connection. The provision and availability of documents is one of the primary barriers for helping people out of homelessness and making effective reconnections. The Review Group heard from a focus group of 12 people experiencing homelessness in Oxford and other contributor that it can be challenging to secure:

- a) Records or proof of domestic abuse and the risk of violence
- b) Personal identification documents
- c) Proof of residence
- d) A bank account

68. The EOH report states that complex local connection criteria can often obstruct fast reconnections, access to essential services and be expensive. The Review Group similarly heard from Matthew Downie, Crisis National Director of Policy and External Affairs, that a significant amount of money is spent nationally to ensure criteria are enforced, rather than providing support. Some of the people in the Review Group's focus group with 12 people experiencing homelessness told of their experiences in dealing with the City Council, which highlight potential barriers which the Review Group believe could be overcome.

*When you go into Crisis, the first thing they say is "how can we help?" When you go into the Council, they put up barriers and use a wrong definition for local connection. The Council is adversarial in its approach and it needs to change.*

***Person Experiencing Homelessness in Oxford***

*You talk to someone different at the Council every time so you have to explain everything over and over again so they understand your case. Also, some people are less strict than others.*

***Person Experiencing Homelessness in Oxford***

69. The EOH and Crisis are recognised as leading organisations in supporting and reducing homelessness. Their resource and funding has enabled the commissioning of various pieces of research specifically looking at the issue of local connection. Most recently in 2018, Crisis have called for local connection criteria for rough sleepers to be scrapped:

*Until local connection is more widely reformed, so it no longer presents a barrier to assistance for anyone at risk of homelessness, it should be scrapped for rough sleepers... This does not, however, rule out responsible reconnections (p.195).<sup>30</sup>*

<sup>30</sup> Crisis, 2018. Everybody In: How to End Homelessness in Great Britain. Available at: [https://www.crisis.org.uk/media/239346/everybody\\_in\\_how\\_to\\_end\\_homelessness\\_in\\_great\\_britain\\_2018.pdf](https://www.crisis.org.uk/media/239346/everybody_in_how_to_end_homelessness_in_great_britain_2018.pdf)

70. The same report highlights that the establishment of a regional arrangements on this issue could also be implemented, such as an Oxfordshire wide relaxation of the local connection rules:

*Until local connection rules are scrapped by national governments, they should be suspended between local authorities in different regions (p.149).*

71. The EOH similarly says:

*Suspending local connection requirements for high need groups, particularly long-term and recurrently homeless people with significant support needs, may be the simplest solution... suspending or abolishing local connection rules under certain circumstances may be the best way forward (p.63).<sup>23</sup>*

72. This view is broadly supported by Professor Suzanna Fitzpatrick and Barrister Liz Davies within the Crisis report (p.389). They suggest that should a net inward flow of people result as a consequence of abolishing local connection criteria, then it may be appropriate to reapply it. This is why the Review Group proposes that a pilot be undertaken to understand the impacts of changes to the Local Connection Policy, if a permanent change to the Policy is not amenable to the City Executive Board or is not considered to be financially feasible in the short term (see recommendation 7).

### **Addressing the ‘Magnet’ Effect**

73. The Review Group were not convinced that a ‘magnet’ effect of people coming to Oxford to make use of Council services would ensue, if the Council relaxed its Local Connection Policy. In speaking to other local authorities, and hearing from expert guests, the Review Group believe that any influx of people with no local connection would be minimal. Housing practitioners within the Review Group’s research suggested that there were more significant pull factors than local councils’ policies.

*I think only a small number of people come here specifically to make use of our overnight services. Instead, the vast majority come here because there is a high footfall, begging opportunities and voluntary help. No matter what your policy, these factors will weigh heavily on whether people migrate to a City.*

**Northern Metropolitan City, Homelessness Manager**

Several community and faith sector partners provide food handouts that can attract rough sleeping to the borough and also, due to its night time economy, the area is an attractive prospect for people to come and beg – this can lead to people choosing to stay and be sustained in the borough for the longer term.

**South Eastern Borough, Pathway Manager**

*We cannot make the link between our policy and the rise in the number of people sleeping rough, as this has been seen nationally in all cities, regardless of how strict their policies are... The evidence that people come here because we have a more relaxed policy is anecdotal. I think it is only a small percentage.*

**Northern Metropolitan City, Homelessness Manager**

74. The Council's Housing and Homelessness Strategy 2018-21 references the notion of a 'magnet' effect, if the Local Connection Policy were to be relaxed:

*There is a high risk that a large number of people from across the country, without a local connection to that local authority would go there, or be referred from other areas of the country. This would result in that local authority facing disproportionate burdens and cost – a burden that would fall on local tax-payers (p.56).<sup>16</sup>*

75. The Review Group believe that more evidence is needed before this can be proven. It was noted by the focus group of people experiencing homelessness that:

*Oxford is a haven for the homeless in comparison to other areas because there are good support services, things to do and a good community of people.*  
**Person Experiencing Homelessness in Oxford**

76. The Review Group believe that in line with the comments expressed above, Oxford's status as a 'haven' for people experiencing homelessness already exists, and that it is a result of much wider circumstances than the influence of the Council's policy; as suggested by service professionals above. Furthermore, colleagues from the Centre for Housing Policy suggested that it is difficult to know whether relaxing the Local Connection Policy would have a 'magnet' effect. However, the lack of agency and ability to travel for homeless people was expressed as a reason for why people would not be drawn to the area. The EOH report similarly highlights the need for further research.

*There is scant evidence of significant geographical mobility among homeless people in the UK; there are examples of highly mobile individuals and internal migration to major cities, but the presumption that homelessness in towns, rural areas and cities is largely the result of homeless people coming from outside the area is not supported by research (p.31).<sup>23</sup>*

77. The Review Group also wish to address the second part of the Housing and Homelessness Strategy comment concerning the 'risk' of people being referred by nationwide support services to Oxford, in light of any policy relaxation. The Review Group believe that relaxing the Local Connection Policy would not remove the duty of other local authorities to help people that have a connection to their area, and they support the view that any person who can reasonably be reconnected to another area should be supported to do so.

### **Long Term Rough Sleepers as Residents**

78. Under the Oxfordshire Common Operational Protocol a person can gain a residency connection if they have evidence of living at an address within the local authority boundary as their main and principal home (for 6 out of the last 12 months or 3 out of the last 5 years). Time spent rough sleeping/sofa surfing, in the Single Homeless Pathway, in rehab, in prison or in hospital, in a bail hostel or other supported accommodation, is not considered grounds for a Pathway Connection. The Protocol reads:

*If a client has been unsettled or not had a main and principal home, including: rough sleeping/sofa surfing, in the Single Homeless Pathway, in rehab, in prison or in hospital, in a bail hostel or other supported accommodation, this period will not*

*be considered for a Pathway Connection. In these cases any assessment based on residency will start from the last time the client held settled accommodation or had a main and principal home, even if that was some years previously (p.18).*

79. However, the Homeless Code of Guidance for Local Authorities advises that:

*'Normal residence' is to be understood as meaning 'the place where at the relevant time the person in fact resides.' Residence in temporary accommodation provided by a housing authority can constitute normal residence of choice and can contribute towards a local connection. If an applicant has no settled accommodation elsewhere, and from inquiries the authority is satisfied that they do in fact reside in the district, then there will be normal residence for the purposes of the 1996 Act.*

80. The Review Group believe the Common Operational Protocol does not align with the Code of Guidance, given that street homelessness can be considered grounds for normal residence.<sup>18</sup> The Review Group ask that the Local Connection Policy allows for people sleeping rough on Oxford's streets to be considered residents of the City, where they meet the usual six months residency requirement. This should also be extended to people who are known by the Council to be 'sofa surfing.'
81. The Review Group recognise that the total abolition of the Local Connection Policy, which in principle they would want to support, is not realistically implementable without national sign up to the issue. However, to help support the most vulnerable people sleeping rough within the City, the Review Group believe the local connection criteria should be extended.
82. The Adult Homeless Pathway Common Operational Protocol could provide more clarity and be explicit about the additional circumstances in which a local connection could be offered. This would help practitioners in applying their discretion, and also people experiencing homelessness themselves, who find it hard to understand the current policy or have misconceptions about it. This proposal was supported by the majority of local contributors to the review.
83. The Review Group note that there is already discretion applied within the Council's approach, but it needs to be communicated more explicitly and publically, particularly to rough sleepers who's outcomes may be influenced by the use of this discretion. A positive narrative about our inclusive approach to discretion within the Policy would therefore be welcome.
84. Implementing a more broadly-defined Local Connection Policy would no doubt contribute to the national discussion. Crisis supports the abolition of such a policy, and it was implied during the review process that they would offer support to the City Council in devising and implementing such a policy; the outcome of which would be valuable to practitioners nationally. The Review Group heard from Crisis that there may be opportunities to secure funding from MHCLG for this.

**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:**

- a) 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.**
- b) 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.**
- c) 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.**

### **Lifetime Local Connections**

85. In speaking to 12 people experiencing homelessness, it was clear that many felt they did have a genuine connection to Oxford, but the nature of these connections would not currently entitle them to support under the Local Connection Policy. Members of the Review Group also felt that some of these people did have a genuine connection to Oxford in their judgement, and that they should not be excluded from the Adult Homeless Pathway on this basis.
86. Crisis recommends that councils’ should, “*improve and extend the statutory definition of the current local connection rules to be more generous and realistic about how and when people have established a local connection*”<sup>30</sup> (p.390). Accordingly, the Review Group believe that the Council’s own Policy could be more open to offering a local connection to more people who have a connection to the area.
87. The Review Group recognise that deciding whether someone has a local connection to an area or not is an entirely subjective exercise, and the current Local Connection Policy attempts to qualify this through its criteria, the minimum standards of which are set nationally. However, the statutory definition used by the council does not account for other connections that people have to Oxford, some of which are arguably more distinct. One contributor to the review highlighted that a person’s connection to an area is better defined by the communities they engage with and their friendship groups, rather than their residency; though, this is clearly harder to quantify.
88. Some participants in the meeting explained that they were born in Oxford, grew up in Oxford, and in some circumstances lived in the City in excess of 20 years. However, they had left the City previously for a variety of reasons, and found on their return they had lost their local connection, and therefore their access to the Adult Homeless Pathway.
89. Violence and relationship breakdown were presented by people experiencing homelessness as a common experience when they had left Oxford to live with a partner, and those who experienced it said the Local Connection Policy was unfair to them. The Review Group note however that provision is already made to offer exemptions to the

Local Connection Policy where it would be unsafe to refer a person back to a local authority. However, the suggestion from people that the Review Group spoke too was that they were not offered an exemption in these circumstances. There was a consensus in the feedback that someone who was born in Oxford, and grew up in Oxford, should have a lifelong local connection.

*I moved away with my partner. After the relationship broke down, I came back to Oxford and had no local connection.*

*We are in a situation where someone whose birth certificate reads “born in the JR” can be denied a local connection. I think that is ridiculous.*

*Through no fault of my own, I now have no local connection even though I have lived here in the past. I moved here with a purpose to start again, and I have signed up to the doctors and the hospital. That should give me a local connection.*

**People Experiencing Homelessness in Oxford**

90. The views of participants in the Review Group’s own research is similarly reflected in a study undertaken elsewhere in the UK this year.<sup>31</sup>

*I was born five minutes up the road ... And yet I had no local connection when I came back [after living away]. My connection is here, do you know what I mean?*

**Person Experiencing Homelessness Elsewhere in the UK**

91. There is no definition of what constitutes special circumstances for exemptions to local connection policies in the homelessness legislation. However, an example given in the Local Authority Code of Guidance is where a person is seeking to return to an area where s/he was brought up or had lived for a considerable length of time. The Review Group believe the Local Connection Policy could take better account of people who have a history of living in Oxford, but have not in recent years. This would in particular help people who return to Oxford and become homeless following a relationship breakdown, for example.

92. The Review Group believe that people who have a connection to the City through their childhood should be offered a local connection. One way to do this may be to offer local connections to all people who were born in hospitals within the City. Another approach would be to offer a local connection to people who went to school in the City for a number of years, although such a system may be more difficult to administer. It is recognised however that where people have a more recent local connection to another Oxfordshire District, it may be more appropriate to refer them to those authorities for support.

**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.**

<sup>31</sup> Johnsen, Fitzpatrick and Watts, 2018. Homelessness and social control: a typology. *Housing Studies*. 1-21. DOI: 10.1080/02673037.2017.1421912

## Volunteers as Locally Connected

93. The Review Group heard from Crisis Skylight Oxford and ACT Housing that a significant number of their service users were either in paid work, or volunteering in the City. Research carried out by Shelter shows that 55% of families in temporary accommodation are in work,<sup>32</sup> and this reflects the fact that many people experiencing homelessness in Oxford have skills and qualities that benefit the City.
94. The Review Group notes that for the purposes of the Housing Act 1996, employment refers to “both paid and unpaid employment”<sup>33</sup> and that unpaid work can give rise to a local connection.<sup>18</sup> People who are in paid work on a non-casual basis are immediately given a local connection under the Council’s Local Connection Policy, but volunteers are not.
95. Offering a local connection to people who have sustained a volunteering role for a significant period of time (e.g. six months) is something that was supported by contributors to their review and explicitly championed by Aspire. The current policy could better reflect the value added by people in voluntary roles. Importantly, people with experience of homelessness may be more inclined to work for charities within the City that previously supported them, and this could help them to progress into paid employment and strengthen the local volunteer base. The Council may want to develop a set of criteria or ‘approved employers’ to help evidence someone’s period of voluntary work.

**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.**

## Extending the Close Relatives Connection

96. At the focus group meeting with people experiencing homelessness, some participants said they had family in Oxford, or very near to Oxford, and that they were not able to gain a local connection. It was also highlighted that due to challenging relationships and family breakdown, some Oxford residents in settled accommodation would not verify their relationship with a person experiencing homelessness. Some people had a long history of their family being settled in Oxford, and were frustrated that the Council’s policy did not take broader account of their family history and the wider family network.

*I grew up in Oxford. I moved away for five years, and when I came back, the Council wouldn’t offer me a local connection. They said my aunt and uncle were not close enough relatives.*

*While I was away from Oxford, my mum died, which meant I lost my local connection.*

***People experiencing homelessness in Oxford***

<sup>32</sup> Shelter, 2018. Over half of homeless families in England are in work, shock new figures show. Available at: [https://england.shelter.org.uk/media/press\\_releases/articles/over\\_half\\_of\\_homeless\\_families\\_in\\_england\\_are\\_in\\_work\\_shock\\_new\\_figures\\_show](https://england.shelter.org.uk/media/press_releases/articles/over_half_of_homeless_families_in_england_are_in_work_shock_new_figures_show)

<sup>33</sup> R. v Ealing LBC Ex p. Fox (1998) 95(11) L.S.G. 35

97. The Homelessness Code of Guidance explains that:

*Family association can include with other family members such as step-parents, grandparents, grandchildren, aunts or uncles... the actual closeness of the family association may count for more than the degree of blood relation.*

98. The Review Group recognise that there is reference to deceased family members within the Common Operational Protocol as providing a local connection, but one participant said that discretion to accept a local connection was not applied in their case. Also as part of their evidence gathering meetings, the Review Group also heard an example of a parent, who had children living in Oxford, being offered accommodation over 80 miles away. The Review Group recognise that each person's application must be judged on a case-by-case basis, but they feel discretion could be applied more generously in some of these cases, particularly where there are high and complex needs involved.

**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.**

### **Admission into Prison, Hospital or Rehab**

99. Under the current Local Connection Policy, time spent in hospital, rehab or prison is not counted towards local connection residency. Under the current policy, if someone with a local connection to Oxford were to enter an institution for an extended period of time, they would lose their local connection. However, the Review Group believes that admission into these institutions should not invalidate a person's local connection.

100. As two services which incur significant costs as a result of homelessness, the Council should be working to expedite and streamline the process of transitioning people into the adult homeless pathway from Prison and Health Services. Individuals who spend time in these institutions are more likely to have greater support needs. A lack of support to transition into accommodation may lead to a further deterioration of health outcomes and reoffending. As a Home Office report explains "Ex-prisoners who are homeless upon release are twice as likely to re-offend as those with stable accommodation."<sup>34</sup>

101. Homeless Link reported in 2014 that approximately 36% of people experiencing homelessness nationally were directly discharged from hospital onto the street, without underlying health problems or housing being addressed.<sup>35</sup> The Review Group heard specific case examples of this happening in Oxford. As with hospitals, older research suggests that 30% of people leaving prison did not have a place to live,<sup>36</sup> and this is known to be happening from HMP Bullingdon also.

102. Oxford City Council recently undertook to monitor the number of people entering and leaving Bullingdon Prison with no fixed address. Over a 4 month period, 27% of

<sup>34</sup> Home Office and Office of the Deputy Prime Minister, 2005. ' Guide to Housing and Housing Support Options for Offenders and People at Risk of Offending.

<sup>35</sup> Homeless Link, 2014. The unhealthy state of homelessness: Health Audit Results 2014. Homeless Link.

<sup>36</sup> Niven S and Stewart D (2005) Resettlement outcomes on release from prison, Home Office Findings 248



prisoners entered prison with no fixed address, and 38% left with no fixed address. The Review Group were pleased to note work being progressed in this area as part of the Trailblazer Programme, where key workers are in place to better support housing transitions and reintegration.

103. In discussions with people experiencing homelessness, the Review Group heard that reform was needed to ensure that people in prison or hospital are not disadvantaged by the Local Connection Policy. Importantly, if immediate support is not available to people being discharged from prison and hospital, their support needs will only be picked up through cost to other services, likely when their homelessness situation becomes more entrenched. Crisis explain:

*[With] the prison system or hospital discharge, the state withdraws responsibility and assistance at an arbitrary point. This is regardless of whether alternative accommodation has been secured or homelessness prevented (p.115).<sup>30</sup>*

104. Indeed, a person's long term admission to an institution provides an opportunity for services to engage with clients and seek transfers back to appropriate services.
105. One person in the homeless focus group explained "Someone can spend their whole life in Oxford, but if they go to prison, they can lose their local connection." This is an issue that was also highlighted by ACT, which supports people exiting prison. One participant suggested that "People with criminal records are let down by the system because they can't get a job or tenancy." This is part of a wider issue concerning how the system penalises people with criminal convictions further, when their debt to society should be considered repaid.
106. The Review Group are of the view that there is little rationale for a local connection expiring on the basis of an institutional stay, given that they are likely to have the most complex needs, and that the circumstances leading to their admission may not necessarily be of their own choosing. The EOH goes as far to say that the exclusion of people from local connection criteria on the basis of an institutional stay in an "extreme interpretation" of English homelessness law.<sup>23</sup> It is therefore recommended that the Local Connection Policy be revised to ensure that an institutional stay does not affect a person's period of residency for the purposes of obtaining or maintaining their local connection.

**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.**

### Local Connections for City Boundary Residents

107. Oxford City's boundary has not changed since 1991,<sup>37</sup> and has broadly remained the same since the inclusion of Blackbird Leys in 1957.<sup>38</sup> Since then, the City's relationship with bordering communities has become more significant, as housing and employment

<sup>37</sup> The Oxfordshire (District Boundaries) Order, 1991.

<sup>38</sup> Victoria County History, 1979. A History of the City of Oxford. London.

land has expanded to meet growing demand. From feedback received at the focus group meeting, some residents believe that areas such as Botley and Kennington should be considered part of the City's identity. Accordingly, they suggested that people living in those areas should be offered a local connection to Oxford, and this is a principle that the Review Group agrees with.

108. It is recognised that there may be other areas where people assume more of a connection to Oxford, despite living outside of the City boundaries. There is no doubt administrative challenges to progress this idea, but the Review Group believe that where people in these close neighbouring areas identify as having a connection to Oxford, they should be entitled to it. More practically, they are likely to want access to their nearest services which will be in the City.
109. There may be opportunity to negotiate funding arrangements with neighbouring district authorities for taking on this responsibility, if it is considered mutually beneficial. This is something that is recommended by Crisis, as they suggest that local authorities should:

*Make allowances for money/resources to follow people, so that applicants can apply as homeless wherever they wish to, but local authorities can reclaim costs from each other where they accept applicants whose local connection lies elsewhere (p.389).<sup>30</sup>*

110. To save on any significant administrative burdens, the Council may wish to develop more informal arrangements with the Oxfordshire Districts for offering a local connection to people that identify with the City, on a case-by-case basis. The Review Group recognise that appropriate funding would need to follow from the respective areas for this, and that the statutory homelessness duties would remain with the referring district.

**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.**

### **Piloting Changes to the Local Connection Policy**

111. The Review Group wants to be bold in its proposals, and believes that whilst these first six recommendations only serve to reprioritise support for a wider group of people, the expansion of the criteria and championing of discretion will allow more people with the highest vulnerabilities currently living on Oxford's streets to access support. It is noted that this may disadvantage people who are currently locally connected with lower needs, if more bed spaces are not made available.
112. The recommended changes to the Local Connection Policy represent a menu of options which the City Executive Board is asked to consider. It may be that the Board take forward some of the suggested changes to the Policy, and not others. The Review Group ask that in light of the evidence, the changes set out in recommendations one to six be made to the Local Connection Policy on a permanent basis.
113. It is recognised however that the City Executive Board may want to reserve the right to withdraw these changes, depending on how they impact demand and pressure on local

services, which will likely create budgetary implications for the Council. It is recognised that changes to the Local Connection Policy will impact the level of demand on services.

114. Accordingly, if some of these changes are not amenable, then the Review Group asks that they be taken up on a piloted basis for a period of 1 year. The value of developing a pilot is set out further in the supporting text for recommendation eight.

**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.**

### **Evaluating the Impact of Changes to the Local Connection Policy**

115. The Review Group were pleased to note the willingness of local and national partners to engage with their work. In responding to the call for evidence, the Centre for Housing Policy highlighted the importance of partnership working “The essential message is a coordinated, integrated strategy which has dedicated resources and involves as many partners as possible [will be most effective].” Therefore, it is recommended that in carrying out and reviewing any changes to the Local Connection Policy, partners should be involved.
116. During the review process, Matthew Downie, Crisis National Director for Policy and External Affairs, said his organisation would be keen to support the Council in piloting and evaluating innovative changes to its policies and practices, and this should be capitalised on. He also expressed MHCLG’s current willingness to support new initiatives that try something ‘different’ and help to contribute evidence for national policy development. Mr Downie agreed that there would be value in piloting a period of policy change and monitoring the impact both financially, and in terms of social value, within Oxford.
117. In order for the implementation of recommendations 1 – 6 to be meaningful, there needs to be a full review of their advantages and disadvantages, and their longer term budgetary implications. The Review Group particularly welcome an assessment after 1 year of the savings that might have been achieved to other public services as a result of the Council’s intervention. This may help the Council’s bargaining position in bolstering pooled budgets between public services, and help inform future policy discussions. The Review Group heard that the Council had previously pooled money with other services such as the NHS and Police and it had worked well. It is understood that the Council’s Trailblazer Programme work may result in such a case for pooled funding being made.
118. Research carried out by Pleace and Culhane in 2016<sup>39</sup> showed that people who experience homelessness for three months or longer on average cost £2,099 per person to mental health services, £4,298 to NHS services, and £11,991 to the criminal justice system. Earlier research by Pleace<sup>40</sup> found that the overall cost to public services of

<sup>39</sup> Pleace, N and Culhane, D, 2016. *Better than Cure? Testing the case for Enhancing Prevention of Single Homelessness in England*. London: Crisis.

<sup>40</sup> Pleace, N, 2015. *At what cost? An estimation of the financial costs of single homelessness in the UK*. London: Crisis.

someone sleeping rough was approximately £20,000 each year, whereas successful intervention only costed £1,400 on average; though this does not account for the cost of unsuccessful interventions.

119. The same research looked at the costs associated with those who had been rough sleeping for 700 days on average, and it shows the increasing costs associated with entrenchment, set out below.

**Figure 4: Estimated cost to services of a person sleeping rough for 700 days<sup>34</sup>**

Cost	Estimated average per person
Drug/alcohol services	£1,320
Mental health	£2,099
NHS	£4,298
Criminal justice	£11,991
Homeless services	£14,808
Total	£34,518

120. PricewaterhouseCoopers’ analysis of Crisis’ 2018 report on how to end homelessness claimed that the total cost of ending homelessness between 2018 and 2041 was £19.3bn (at 2017 prices), but this would deliver discounted benefits to public funding of £53.9bn<sup>41</sup> The report concludes that for every £1 invested in the solutions recommended by Crisis, £2.80 will be generated in benefits. It is expected that the applicability of such savings would translate to local interventions also.
121. Data such as this supports the view that the Review Group would like the Council to take with regards to rough sleepers; that they should not be considered a costly ‘problem’ but as a potential asset to the City. Many of those who currently find themselves without a roof over their head can – and do - go on to contribute economically and culturally to the life of the City (see recommendation 22).
122. The Review Group heard that female homelessness is rising nationally, and that it is underreported in comparison to male homelessness (see recommendation 16). In addition to assessing the financial impact of any changes to the Policy after one year, the Review Group would like to see an evaluation of the equalities impacts of the revised Local Connection Policy. Specifically, in hearing case examples of the challenges experienced by women and people who are LGBT+, the assessment should take account of how services may better take account of the specific needs of these individuals.

### **Demand on the Adult Homeless Pathway**

123. Given that expanding the local connection criteria would provide more people with a local connection to Oxford, and therefore widen access to Oxford funded beds within the Adult Homeless Pathway, the assessment would need to take account of how much additional demand is generated as a result of supporting people who may also have a connection to other Oxfordshire districts. The Review Group are therefore

<sup>41</sup> PricewaterhouseCoopers (2018) *Assessing the costs and benefits of Crisis’ plan to end homelessness*. London: PwC.

recommending that the assessment should evaluate the benefits that may be experienced by neighbouring district councils as a result of any policy change by Oxford City Council.

124. Council officers advised the Review Group that studying and forecasting the likely impact of any changes to the Local Connection Policy before they are implemented would be preferable, given the likely impact on resources. There are several unknowns related to the level of demand for services that changes to the Policy could generate. However, the Review Group believe that whilst more funding would be preferable to manage a likely increase in demand on the Pathway, these changes should still be implemented to refocus and highlight the discretion offered within the policy, and provide a service that is more needs-focussed (i.e. vulnerability driven).
125. People sleeping rough in Oxford, local connection or not, draw on the resources of a number of local services. This demand already exists for OxSPOT, the Police and Health Service, which do not operate local connection policies. The Review Group believe that making the changes set out in recommendations 1 - 6 is a way of acknowledging a demand that is already present.
126. The Review Group has stopped short of recommending increasing the number of beds in the Pathway but note the advice of Council officers that there would need to be a focus on how to fund increased capacity within the Pathway and how to improve outcomes upon exit from the Pathway. It is clear that Oxfordshire County Council cuts to floating support services, together with reductions in funding for mental health services, have reduced the opportunities for effective move-on. It is the view of the Review Group that these issues should be the subject of a separate but complementary piece of work.
127. The review process has drawn attention to possible funding sources from MHCLG and the Homelessness Reserve which may allow for detailed work to be undertaken to better understand the level of demand on the Pathway, either before or after changes are made to the Policy. One way to do this in the short term would be to model the expected impact of policy changes based on current rough sleeping data for the City, to assess how applicable it might be to individuals who currently have no official local connection.
128. There would need to be a relative increase in the move-on opportunities available for people exiting the pathway if it is to cope with increased throughput. Accordingly, if there were opportunities to speed up move-on from the Pathway and better understand the outcomes of those exiting it, this would be most welcome.
129. It is noted by the Review Group that the Council has a duty to secure best value and “make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness.”<sup>42</sup> The Review Group believe that the adoption of a more flexible Local Connection Policy may provide savings to local tax payers, in light of the cross-service savings that can be expected as set out in this section of the report. This is likely to be particularly evidential in high needs cases of people with no local connection, the most entrenched, and for those who refuse to reconnect; although such savings may not necessarily be ‘cashable’.

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<sup>42</sup> Section 3 of the Local Government Act 1999 (as amended by s137 of the Local Government & Public Involvement in Health Act 2007).

**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:**

- a) The demand for bed spaces within the pathway**
- b) The proportion of people rough sleeping with a connection to Oxford**
- c) The estimated savings and expenditure for other public services**
- d) Any impact on equalities, with a specific focus on gender and sexuality**
- e) How any changes have impacted on neighbouring district councils.**

## **Working with Partners**

130. Oxford City Council already has strong partnership arrangements in place with the Oxfordshire districts to help coordinate homelessness support, such as the Common Operational Protocol, jointly commissioned services and bed 'lending' practices. This notion of lending bed spaces between local authorities was identified as common and good practice among local authorities, particularly in London.
131. In having contributions from London authorities, the Review Group noted that they trade, swap and lend support between one another to adjust for demand and specific cases of homelessness. For example, where there were cases of people not wanting to reconnect, local authorities would sometimes trade responsibilities for supporting different people, which strengthened the agency of people to choose where they had a connection.

*Borough 'A' will take on a rough sleeper whose local connection lies with borough 'B,' but who has been rough sleeping in borough 'A' for a long time, and is reluctant to return to borough 'B.' They will do this in turn for borough 'B' offering a space in a specialist hostel in their area that might meet that needs of a rough sleeper from borough 'A'. **London, Homelessness Service Commissioner***

132. In Oxfordshire, each neighbouring district council funds a different number of bed spaces within O'Hanlon House Hostel for people with a local connection to their area. The Review Group heard from senior staff at Homeless Oxfordshire that the process of lending beds between each authority in circumstances of fluctuating need was a drawn out process, involving approvals from various partners.
133. Homeless Oxfordshire said the current pathway structure means they can no longer operate as a service based on priority need, because each district has different levels of availability for move-on options, with Oxford having the most opportunities for move-on (Connection City, Mayday, Simon House, Project 41). Evidence was submitted to suggest that rough sleepers from neighbouring districts spend more time in O'Hanlon House because they lack move-on opportunities, and there was a particularly acute need for bed spaces for people with complex needs from the surrounding districts. The Review Group believe that the Council should make clear to neighbouring districts

through appropriate channels that more funding is needed to support their clients with complex needs. This may be done through the Health Improvement Board, for example.

134. The Review Group was concerned to hear of some circumstances where people were vulnerable and in need, and there were bed spaces in O'Hanlon House that could not be taken up because of connection criteria. The Review Group ask that the partnership considers how to ensure that no bed spaces go unallocated when people are in need. Given the importance of partnerships in this process, the Review Group also asks that the Council lobbies neighbouring district councils to sign up to any revised local connection criteria, to ensure it is uniformly applied across Oxfordshire.

**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.**

## Part 2: Reconnecting People

### Refusal to Engage or Reconnect

135. Reconnection is defined in as "the process by which people sleeping rough who have a connection to another area... are supported to return to this area in a planned way."<sup>20</sup> The Review Group heard from contributors that where reconnections are made on a voluntary basis, they are generally successful. However, Matthew Downie, Crisis National Director of Policy and External Affairs, highlighted that there are many barriers that exist to effective reconnections nationally including:

- a) The use of one way tickets, without support packages for reconnecting*  
*b) Refusing reconnection can 'burn bridges,' resulting in exclusion from services*  
*c) Reconnections did not take account of peoples social and support networks*  
*d) Disputes between local authorities in accepting reconnections*  
*e) A lack of choice, agency and assistance in the reconnection process*  
*f) Money was sometimes spent on creating and maintaining barriers to support.*

*These are policy choices to manage resources, lacking focus on human outcomes.*  
**Matthew Downie, Crisis National Director of Policy and External Affairs**

136. One of the key themes emanating from evidence gathered from 12 local authorities was that reconnections would always be sought, except in exceptional circumstances. For

those with significant vulnerabilities, reconnection was generally sought after work had been done to stabilise that person's situation (i.e providing shelter and support).

137. Some pathway managers took advice from outreach workers on whether to reconnect someone, and others had dedicated reconnection officers responsible for linking people with services in other areas. Reconnection work was highlighted as resource intensive, and the participating local authorities indicated that they had increased their focus on this in recent years.
138. Some authorities were asked what would happen in situations where a person refused to reconnect. This question was asked in light of challenges highlighted by Crisis concerning the use of a 'single service offer', "wherein rough sleepers who refuse to comply are denied access to homelessness services in the identifying area."<sup>20</sup> This adds to the 'burning of bridges' concern highlighted by Matthew Downie.
139. Most local authorities said they would work with that person to understand why they refused to reconnect, and apply discretion on whether that was a valid reason, but no policies were forthcoming on this issue. In one example, where someone refused a connection, the outreach team would monitor them at 'arm's length' and judge whether their situation was deteriorating to the extent that they required the support of the homeless pathway.

*If people refuse to connect to a different area, we will make a judgement on their reasons for refusing to reconnect, and sometimes allow them onto our pathway.*  
**London Borough, Homelessness Manager**

140. Another challenge highlighted by a 2015 Crisis report is that some authorities fail to recognise that people have moved to their area because they lack connections and support networks in their origin locality. Consequently, any non-voluntary return to that area would be unlikely to improve that person's circumstances.
141. The advice from Crisis is that "Reconnection should generally only be pursued when rough sleepers have meaningful connections."<sup>20</sup> Homeless Link similarly advocate that reconnection offers should be credible and realistic, based on preventing a person's return to rough sleeping, and "Where a person refuses the reconnection offer, multi-agency work should take place to repeat the offer when they come into contact with services."<sup>43</sup> Under the Oxfordshire Common Operational Protocol section concerning reconnection, it states:

*If the client does not engage with the process (lack of willingness to engage and/or refusal of the service offer), outreach teams may exclude a client from any services they may be accessing e.g. the day centre at O'Hanlon House, or sit-up (p.32).*

142. The Review Group heard from its external contributors that people need agency and choice in the reconnection process if it is to benefit them, and a Single Service Offer limits that choice. An ultimatum of this nature may serve to the detriment of that person if they are excluded from services. Accordingly, Crisis recommends that individuals' views and preferences as to where they have connections should not be over-ridden by rigidly enforced local connection criteria.<sup>20</sup>

<sup>43</sup> Homeless Link, 2014. Assessment and Reconnection Toolkit. Available at: [https://www.homeless.org.uk/sites/default/files/site-attachments/Reconnection%20toolkit%20Dec%202014\\_0.pdf](https://www.homeless.org.uk/sites/default/files/site-attachments/Reconnection%20toolkit%20Dec%202014_0.pdf)



143. One of the primary barriers for helping people out of homelessness and making effective reconnections is the provision and availability of documents. This in turn can make it difficult to prove a local connection, or in circumstances where violence is involved, difficult to evidence reasons for not wanting to return to another local authority area. Because there are many genuine and sincere reasons for not reconnecting, which cannot always be evidenced, the Review Group believe that a person's refusal to reconnect should not indefinitely affect their entitlement to support, or their ability to access the sit up service.

**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.**

### Establishing a Reconnection Log

144. The Review Group heard from Matthew Downie, Crisis National Director of Policy and External Affairs, that there is little evidence available to assess how effective reconnections are nationally. He said that given the barriers that exist to reconnection, and the level of resources available to assist in meaningful reconnections, it was likely that many were unsuccessful. Crisis explain:

*[Reconnections] have become an increasingly prevalent feature of rough sleeping strategies in England in recent years, albeit largely in the absence of robust evidence regarding the impacts on rough sleepers. Evidence regarding reconnection outcomes is, at present, very weak... The limited data available suggests that reconnection experiences and outcomes vary dramatically.*<sup>20</sup>

145. Given the lack of evidence about the outcomes of reconnections, and the importance of such interventions, this may be another area where the Council could partner or engage with Crisis in piloting a research project. The Review Group are looking for assurance that reconnections are working for the people involved, and that they are being referred to suitable services. As Homeless Link explain:

*Reconnection must not be used in isolation and should never just be a ticket home. Exploring why someone has become homeless and what support can prevent future homelessness should form the basis of the reconnection offer.*<sup>43</sup>

146. Understanding whether reconnection outcomes are effective will help demonstrate whether the Council's policies are working for the people currently resident on Oxford's streets with no local connection. Research suggests that practitioners face daily ethical challenges in whether to refer people to services that may be insufficient for their needs, but they may feel compelled to refer owing to the rigidity OF local reconnection policies.<sup>20</sup>
147. The Review Group would not wish any person to be referred to another local authority in circumstances where there are doubts over the suitability of services and likelihood of that person progressing to positive outcomes. A reconnection log, which tracks the progress of each reconnection case, would help develop an evidence base to help

inform practitioner level decisions on whether to reconnect, or seek an exemption from the Local Connection Policy. Crisis provide supplementary support for this approach:

*Rough sleepers and named contacts in recipient agencies/authorities should be followed up after every reconnection as standard procedure... This would not only serve to protect against potential negative impacts, but also improve the currently weak evidence base on reconnection outcomes.*<sup>20</sup>

148. A reconnection log would also enable the Council to better understand local barriers to reconnection, and the Review Group encourages the Council to challenge services in other areas to take responsibility for ensuring that appropriate connection services are in place, as advocated for by Homeless link.<sup>43</sup>

**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.**

### An Oxfordshire Reconnection Service

149. As areas with high populations of people sleeping rough, local authorities in London have had to innovate and work more closely with partners to help reduce instances of homelessness and rough sleeping. Indeed, many of the examples of best practice referenced throughout this report have come from London.
150. The Review Group recognises that the density, geography and unitary elements of London governance supports more integrated service provision for people experiencing homelessness. London has the benefit of funding and coordination from the Greater London Authority and the Mayor, which strengthens cross-boundary relationships and support standards. The Review Group also heard from several local authorities that they make use of the Clearing House Partnership which has resulted in over 13000 new tenancies with floating support, in partnership with 50 housing associations across London.
151. Whilst there are limitations to the transferability of practices from London to Oxford, the Review Group believe there would be benefit to introducing an Oxfordshire wide reconnections service. Given that 19 people who slept rough in 2017/18 were reconnected to another area,<sup>14</sup> representing a small proportion of people with no local connection, the Review Group believe the rate of successful reconnections would improve through the introduction of such a service.
152. For example, the Greater London Authority funds Safe Connections which operates independently for any borough authorities. This service challenges reconnections between local authorities to ensure they are appropriate for resettlement.

**Figure 5: Safe Connections Delivery Model: Developed by Phil Hennessy**



153. The Review Group recognise that the introduction of such a service would have budget implications, and feasibility modelling would need to be undertaken to assess how implementable such a service would be. This would also require pooled funding arrangements to be established, and partner sign up for it to be effective. Therefore, it is recommended that the Council commissions a report in the first instance to assess the case and options for establishing a reconnection service.

**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.**

### Part 3: Allocating Housing

154. Oxford's position as the most unaffordable city in the UK is caused by the high cost of housing, with average house prices being around 16 times the yearly average household income. As a consequence, the number of realistic move-on opportunities for people exiting the Adult Homeless Pathway is significantly limited. Accordingly, many local authorities that contributed to this review highlighted that whilst some practices worked for them, they may not necessarily be appropriate for Oxford given the challenges of housing affordability. As the Centre for Housing Policy highlighted, the only local authorities with sufficient affordable housing stock are those which are depopulating, which is not the case for Oxford as an area of growth.

*The issue is funding for the back end of the pathway, where there are limited move-on opportunities because of a lack of affordable housing. I am sure this is a problem for Oxford as well. That's why people become entrenched; because there is no throughput [from homeless pathways].*

**Northern Metropolitan City, Homelessness Manager**

155. The Review Group recognise that in order to achieve throughput from the Adult Homeless Pathway into settled accommodation, the Council's definition of a local connection in relation to homelessness must be aligned to the definition used for the Housing Register.
156. Changing the homeless local connection definition would have implications for exiting the Adult Homeless Pathway because under the current Housing Allocations Scheme, move on options are far more limited for people without a local connection. Accordingly, the Review Group is recommending that the Housing Allocations Scheme be revised to reflect any changes made to the homeless local connection criteria as a result of this review, so that a broader cohort of people with a connection to the area can be entitled to access housing through the Housing Register.
157. For those who are accepted into the Adult Homeless Pathway through a discretionary vulnerability exemption, it is particularly important that they are given opportunity to access the Housing Register, given that they are more likely to experience challenges in securing and sustaining accommodation through the private rented sector.

158. The Review Group is pleased to note that the Allocations Manager has discretion to give exemptions to homeless clients within the Homeless Pathway awarded an exemption prior to entering the Pathway who have no local connection with any area. The Review Group is also pleased to note a number of exceptional circumstances listed in the Housing Allocations Scheme which allow access to the Housing Register. This is the type of detail and narrative that could be expanded upon within the Local Connection Policy.

159. The Council's Housing Allocations Scheme explains that one of its principal housing objectives is:

*To promote the widest possible access to housing to residents of Oxford or those assessed as having local connection to the City.*

160. The recommendations to expand the local connection criteria for access to the Adult Homeless Pathway and the Housing Register support this vision. The Review Group would equally like to ensure that stays in prison, hospital or rehab should not disadvantage a person by resulting in their exclusion from the Housing Register (see recommendation 5).

161. The Review Group heard contributions from ACT; an organisation which provides accommodation to vulnerable people in the City, and operates outside of the Adult Homeless Pathway. Of the 16 people housed by ACT, only two had a local connection as defined in the Common Operational Protocol. These were 16 people who may have otherwise been sleeping rough on the streets of Oxford.

*One of the biggest challenges for ACT is move-on support, which could be helped through changes in Council policy... Some people have been in shorthold tenancies with ACT for two years, take part in community activities, and have positive social networks. However, they and are not offered a local connection [As defined in the Housing Allocations Scheme]. This system has the potential for people to fall through the net of support.*

**ACT Outreach Team Manager**

162. As a result of hearing this case study, the Review Group believe that individuals in these circumstances should be able to gain a local connection, as defined in the Local Connection Policy for Homelessness and the Housing Allocations Scheme.

163. At present, the Housing Allocations Scheme explicitly excludes people in supported accommodation from its definition of residency. It states:

*A local connection through residence is not established in situations where the applicant is... living in any other form of accommodation considered "temporary" in nature, including hospital accommodation and other forms of supported accommodation.*

164. The Review Group believe that the Council should offer people who have developed a residency connection to Oxford through supported accommodation (at least six months during the previous 12 months) access to the Housing Register. The Council may wish to identify a list of recognised providers for this connection to be established.

165. It is noted however that revising the Housing Allocations Scheme may involve a lengthy process of review and appropriate consultation. Therefore, the Review Group acknowledge that this may not be implementable in the short term.

**Recommendation 13: That the Council revises the Housing Allocations Scheme to:**

- a) **Accept any person who qualifies for a local connection under any accepted recommendations in this review onto the Housing Register.**
- b) **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.**
- c) **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.**

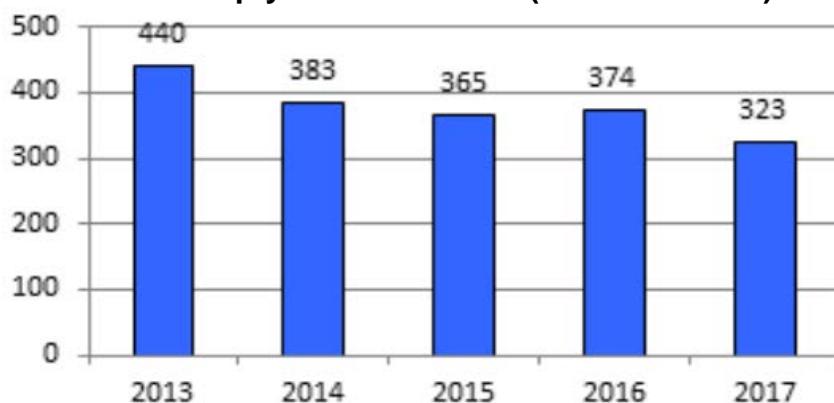
## Part 4: Commissioning and Budget Setting

### Maximising the use of empty properties

166. In speaking with people experiencing homelessness, the Review Group heard that it was frustrating to see long term vacant properties in the City which could alternative be used to house them. For a property to be considered empty by the Council, it needs to have been unoccupied for more than six months, the same amount of time that would otherwise secure a residency connection under the Local Connection Policy.

167. The City Council's first Empty Property Strategy was introduced in 2009 when there were 717 empty dwellings recorded across the City. Since then there has been a substantial reduction in the number of empty dwellings to 323 in November 2017. This is a significant success for the City, which can be attributed in part to the Council's proactive interventions. The Review Group recognise that the reasons for properties being empty are varied and complex. However, some of those properties may be vacant because they are not of an acceptable standard for the private rented market, and there may be scope to better incentivise owners to bring properties back to use.

**Figure 6: Number of empty units in Oxford (Over 6 months)**



168. The Review Group has learned of schemes elsewhere that may help bring more empty properties into use, specifically to support the accommodation needs of people experiencing homelessness. Last year, Ireland introduced a Repair and Leasing Scheme (RLS). The RLS website explains:

*Where a property requires repairs to bring it up to the standard for required for rented properties, the RLS will pay for the repairs up-front in return for the property being made available to be used as social housing for a period of at least 5 years under either a direct lease or Rental Availability Arrangement with the local authority. Under the scheme, the cost of the repairs will be repaid by the owner by offsetting it against the rent due to the owner for the property over the period of the lease agreement.<sup>44</sup>*

169. The Review Group believe there are examples of properties in Oxford that would benefit from such a scheme. As in Dublin, these properties could be earmarked for people experiencing homelessness, at reduced rents, to broaden the move-on opportunities available within the City. There are a number of ways these properties could be managed by the Council, or a partner, such as using them for time limited Housing First style interventions.

170. Introducing such a scheme would require the commitment of significant capital from the Council, particularly in the first instances of refurbishment. However, this proposal supports the Council's wider objectives and long term ambitions for the City beyond homelessness, by bringing disused properties permanently back to market. The Review Group believe this scheme could also extend to commercial properties that may be suitable for short-term residential lets post-refurbishment. Given the need to make a fuller assessment of the opportunities to introduce an RLS, the Review Group recommend that an options report be brought forward to the City Executive Board in the first instance.

**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.**

## Female Homelessness

171. Domestic abuse is particularly prevalent in cases of female homelessness, where 32% of women say it contributed to their homelessness.<sup>45</sup> In reviewing the research, Safelives suggests that between 44% - 89% of women who are homeless have also experienced violence either during or prior to becoming homeless.<sup>46</sup> The Review Group heard from both men and women about their experiences of domestic abuse before

<sup>44</sup> Rebuilding Ireland, 2018. Repair and Leasing Scheme. What is it? Available at: <http://rebuildingireland.ie/repair-and-leasing-scheme/>

<sup>45</sup> Safelives, 2018. Homelessness and Domestic Abuse. Available at: <http://www.safelives.org.uk/spotlight-5-homelessness-and-domestic-abuse>

<sup>46</sup> Safelives, 2017a. Why a Gendered Approach to Supporting Women Experiencing Homelessness with Histories of Violence is Vital. Available at: [http://www.safelives.org.uk/practice\\_blog/why-gendered-approach-supporting-women-experiencing-homelessness-histories-violence](http://www.safelives.org.uk/practice_blog/why-gendered-approach-supporting-women-experiencing-homelessness-histories-violence)

becoming homeless, and how the abuse had continued when they became homeless, particularly for women.

172. In Oxford, between November 2016 and November 2017, the number of women counted as rough sleeping rose from 0 to 10, representing a significant change in the homeless demographic. The rise in female homelessness was also identified as an issue in London, when the Review Group visited Croydon Council.
173. A 2015 report suggests that homeless women are more likely than men to have higher rates of drug use and mental health problems.<sup>47</sup> Furthermore, it is estimated that half of all homeless women have children, the majority of which are in care.<sup>46</sup> The European Observatory on Homelessness suggests that when children are taken into care, this can lead to parents becoming homeless, because of the reduction or withdrawal of their welfare benefits.<sup>23</sup>
174. Given the additional complexities and challenges for female homelessness, particularly in relation to gender based violence, some organisations have criticised local authorities and charities that take a gender neutral approach to homelessness services. The research suggests that women experiencing homelessness are more likely to be hidden in official statistics. For example, One25, a charity that supports women involved in street sex-work in Bristol, suggests that 80% of street sex workers locally are homeless.<sup>48</sup> Because of their transient housing situation, they are rarely identified as homeless and their situation makes them more wary of engaging with local authorities, and more vulnerable to exploitation and abuse.
175. Councillor Aziz, a member of the Review Group, undertook to interview six women experiencing homelessness in Oxford about their experiences. The women interviewed spoke of repeated instances of harassment and their vulnerability whilst sleeping rough.

*The majority of girls in the shelter have been in abusive marriages, with abusive family members. They've experienced domestic violence and some have experienced rape.*

*Even though I have a partner, the amount of times a day I get asked if I will give men sex for money. It's every day. Every woman who is homeless – automatically men assume she is a prostitute.*

*I was being picked on [at a hostel] because of my sexual identity. I was being manipulated. I was being bullied and I was abused. I still get it now. I felt really down. I felt depressed. I felt discriminated.*

*When you have your period and you can't keep yourself clean. It is horrible. You can't get products, and you can't change into clean clothes or get a wash.*

***Women currently experiencing homelessness in Oxford***

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<sup>47</sup> Homeless Link, 2015. Homeless health data finds heroin and cocaine dependency more prevalent amongst women than men. Available at: <https://www.homeless.org.uk/connect/news/2015/aug/05/homeless-health-data-finds-heroin-and-cocaine-dependency-more-prevalent>

<sup>48</sup> Safelives, 2017b. Homelessness and abuse amongst street sex-working women in Bristol. Available at: [http://www.safelives.org.uk/practice\\_blog/homelessness-and-abuse-amongst-street-sex-working-women-bristol](http://www.safelives.org.uk/practice_blog/homelessness-and-abuse-amongst-street-sex-working-women-bristol)

176. Whilst the UK has local connection exemptions for those who are fleeing violence or care leavers, for example, the European Observatory on Homelessness says there is also merit in relaxing local connection criteria for women in particular, recognising that homelessness prevention systems are inherently androcentric and present more challenges for women.<sup>23 49</sup>
177. Local service providers also raised the issue of female homelessness, highlighting cases of specific challenges for women in relation to homelessness. There was broad support among contributors for greater exceptions to be made in supporting women, particularly in circumstances where trauma had been experienced.

*Many female rough sleepers have experienced trauma in their lives which has made them fearful of living in same-sex accommodation, and some would prefer not to go into accommodation that is shared with men.*

**Homelessness Support Worker**

178. The Review Group believes that given the recent rise in female homelessness, and the increased risks experienced by women, that specific measures should be taken to make exceptions for additional support for women with and without a local connection. The Review Group is pleased to note that as part of a recent successful bid to MHCLG, the Council is planning to fund 5 bed spaces in female only accommodation and it is recommended that the level of this provision is kept under review and that 5 bed spaces are retained as a minimum.
179. In speaking with women experiencing homelessness, Councillor Aziz learnt that some women wanted a space to be made available to discuss matters affecting them. Consequently, the Review Group would like to see funds made available to support a female homelessness forum. One of the key issues identified by these women and support workers was the availability of free sanitary products. The Review Group asks that these be made available also.

**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.**

**Recommendation 16: That the City Executive Board, as part of its budget setting process, identifies provision for:**

- a) 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.**
- b) 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.**

<sup>49</sup> Galbraith, 2018. An exploration of migrant women's experiences of homelessness within the UK. Available at: <https://housing-studies-association.org/wp-content/uploads/2017/05/Jennifer-Galbraith.pdf>



## Provision for Pets

180. A recurring theme throughout discussions with service providers, council officers and people experiencing homelessness was the importance and value of pets for companionship. It was noted that in some circumstances, people would turn down accommodation because their dog could not be housed with them. Provision is made by some services for dogs to be looked after in local kennels, although this is not always considered suitable by the pet owners.
181. Peer reviewed research carried out by Ontario Veterinary College explains that there are significant benefits to having a pet companion during periods of homelessness.

*Qualitative research has demonstrated that animal companions help homeless youth cope with loneliness, are motivators for positive change, such as decreasing drug or alcohol use, provide unconditional love without judgement, and improve youths' sense of health.<sup>50</sup>*

182. The research also explains that whilst there are significant psychological and social benefits to be gained from having a pet, access to services including housing and jobs can be limited by such companionship. Going forward, the Review Group asks that more provision be made for people to have their pet access shelter with them, rather than at kennels. This issue is particularly pertinent when the Severe Weather Emergency Protocol is in place.

**Recommendation 17: That the Council makes on site provision for domestic pets a material consideration as part of the supported accommodation commissioning process.**

## Housing First and Critical Time Intervention

183. As part of the Review Group's work, national policy experts and leading academic researchers were approached to contribute to the review. Mathew Downie, Crisis National Director of Policy and External Affairs, championed the Housing First approach to homelessness support. Whilst this matter was not explicitly within the scope of the review, the developing evidence base supporting a Housing First approach is compelling. The Housing First model is premised on providing wrap around support and quick access to housing for those with the most complex needs. Housing First England explains:

*Housing First is an internationally evidence-based approach, which uses independent, stable housing as a platform to enable individuals with multiple and complex needs to begin recovery and move away from homelessness. Through the provision of intensive, flexible and person-centred support, 70-90% of Housing First residents are able to remain housed.<sup>51</sup>*

184. Mr Downie told the Review Group that Housing First had been proven internationally as the most effective form of intervention for those with complex needs. Glasgow was

<sup>50</sup> Lem, et al. 2016. The Protective Association between Pet Ownership and Depression among Street-involved Youth: A Cross-sectional Study, *Anthrozoös*, 29:1, 123-136.

<sup>51</sup> Housing First England, 2018. About Housing First. Available at: <https://hfe.homeless.org.uk/about-housing-first>

identified as operating a good model, having housed 50 people over six years with few people dropping out of the programme. The system was based on removing all barriers to accessing support including local connection criteria, intentionality and priority need.

185. In the UK to date, approximately 320 people have been supported by Housing First but Crisis estimate the need to be in the region of 18,500 people. A research study undertaken in Liverpool by Crisis found that savings in relation to expenditure on homelessness services can be fivefold per positive outcome,<sup>52</sup> compared to existing services. Following pilots in other areas of the UK, the Greater Manchester Combined Authority has pledged to make available five one bed properties each year to contribute towards their Housing First programme.<sup>53</sup>
186. The Review Group heard from Council Officers that Oxford City Council has two Housing First type projects that have been operating for some years. These schemes involve a high support ratio and disregard many of the 'rules' traditionally associated with homelessness support. The Council previously identified 20 entrenched rough sleepers with complex needs to be involved with these Housing First projects, which have had relative success. Notably, the significant difference between Glasgow and Oxford however was the housing market, and the lack of affordable housing in Oxford.
187. Professor Pleace from the Centre for Housing Policy, who co-authored the European Observatory on Homelessness Report on Local Connection Policies, was asked what opportunities there may be for Oxford specifically to prevent and reduce homelessness. He too recommended Housing First, and suggested this was currently favoured by MHCLG for funded pilots. Professor Pleace also advocated for exploring opportunities to pilot a Critical Time Intervention (CTI) approach to support. This had proven successful in Denmark and the USA, sharing similarities with Housing First.

*CTI is designed as a time-limited model, where intensive support is used for some time before transitioning someone with high and complex needs onto a lower intensity support service at the point they are ready to live more independently. This approach is housing led like Housing First, but is not open ended, which may better suit local authority commissioning cycles and budgets.*

**Centre for Housing policy**

188. Crisis, which similarly advocate for the CTI model, explain that this approach is particularly well suited to "physically locating staff in institutional settings, by establishing protocols to ensure people have a planned move into secure accommodation."<sup>30</sup> The Review Group notes that the Council's Trailblazer Programme is particularly focussed on providing this upstream approach to prevention by locating professional workers within local institutions to support transitions. A report on the outcome of this programme is currently scheduled for consideration by the Council's Housing Scrutiny Panel on 12 November 2018.

**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.**

<sup>52</sup> Crisis, 2017. Housing First feasibility study for the Liverpool City region. Available at: [https://www.crisis.org.uk/media/237545/housing\\_first\\_feasibility\\_study\\_for\\_the\\_liverpool\\_city\\_region\\_2017.pdf](https://www.crisis.org.uk/media/237545/housing_first_feasibility_study_for_the_liverpool_city_region_2017.pdf)

<sup>53</sup> Manchester Housing Providers Partnership, 2017. Homeless Charter: Partnership pledges.

## Supporting the Outreach Team

189. The Review Group heard from Croydon Council's Outreach Manager that they were given significant autonomy to operate how they. This was however bound by key performance indicators which they regularly exceeded. It was made clear that there was significant discretion in how they applied local connection criteria, but also when and how they worked shifts. The Review Group was impressed with the flexibility afforded to Croydon's outreach team to work reactively to fluctuating demand. For example, shift patterns could change on a regular basis, including working outside of normal working hours to address demand.

**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.**

## Central Government Funding

190. Throughout 2018, the Council has worked hard to secure an additional £1m from MHCLG to provide new support services and fund extra bed spaces. This reflects a recent drive from Central Government to tackle homelessness, as set out in the Rough Sleeping Strategy 2018. The Strategy commits up to £100m over the next two years to tackling homelessness, and their ambition to end rough sleeping altogether reflects the ambition and direction of the Council.
191. Whilst the additional funding already secured is most welcome, it raises questions over the longevity and sustainability of the new and improved services the Council is supporting. Specifically, there is no guarantee that MHCLG funding for these new services from will continue in the long term. Therefore, the Review Group is recommending that the Council lobbies Central Government to make clear its intentions about providing sustainable long term funding to support its Strategy.
192. There are also wider homelessness influences that the Council may wish to make representations to Central Government about such as lifting the Local Housing Allowance (LHA) rates and scrapping local connection policies nationally altogether; policies which are do not appear to be fully aligned with the national focus on tackling homelessness.<sup>30</sup> The Review Group hope that as a more joined up national focus on Homelessness will render the Local Connection conundrum a non-issue in time. Separately, raising the LHA rates would help people to sustain private sector tenancies by reducing or eliminating the considerable shortfall between the value of the benefit payments and the levels of private sector rents they pay. This issue is exacerbated in Oxford by the particularly high cost of housing in the City, and the fact that LHA rates are based on a wider geography.

**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.**

## Part 5: Communicating What We're Doing

### Changing the way we communicate

193. Oxford has a wealth of voluntary organisations that contribute significantly to supporting the wellbeing of people experiencing homelessness. The recent advent of the City Conversation in particular represents an excellent forum for bringing forward partnership approaches to addressing homelessness. All of the contributing organisations want to help people off of the streets and into suitable accommodation. The Review Group believe there have been occasions however where the public have received mixed messages from various organisations about the work of the Council, which have not always been accurate. Members feel there is a general lack of clarity in the public domain about what the Council's duties are in relation to homelessness, and there is confusion about the Local Connection Policy, and how and why it is applied.
194. The Review Group considered the Council's plans for communicating about winter accommodation provision in 2019, and discussed their own experiences of council communications. It was agreed that Council communications sometimes framed homeless people in a negative way, which could contribute towards existing stigma of the issue. A recent piece of UK research into homelessness communications made several recommendation which are paraphrased below:
- a) *Use the value of Moral Human Rights to connect and drive policy support*
  - b) *Tell a wider range of stories about the lived experience of homelessness*
  - c) *Avoid othering language that creates a distance, evoking sadness or pity*
  - d) *Find different ways of repeating the message across all communications.*<sup>54</sup>
195. The Review Group want to highlight that people experiencing long term homelessness are victims of multiple system failures driven by austerity, such as the structure and administration of Housing Benefit and the closure of specialist health facilities.<sup>55</sup> People sleeping rough in Oxford are members of the public, voters and residents, and the Review Group believe more could be done to remove the 'us and them' narrative that they perceive to be sometimes apparent in Council communications.
196. There was a consensus between contributors and councillors that there needed to be paradigm shift from considering people who are homeless as a problem, to considering their potential to contribute to society. One contributor with local experience in supporting people experiencing homelessness explained that Homeless Link championed a strength based approach to homelessness recovery, where practitioners should consider what strengths someone has and start with the positives.<sup>56</sup>
197. The Review Group heard from people experiencing homelessness, and service professionals, that local authority local connection policies were reflective of national immigration policies. Specifically, they highlighted experiences of local authorities being reluctant to offer a local connection, because the authority said they had a 'better' connection to another area (this was not explicitly suggested as an experience in

<sup>54</sup> Nichols, J. et al, 2018. Reframing Homelessness in the United Kingdom. Frameworks institute / Crisis. Available at: [https://www.crisis.org.uk/media/238823/reframing\\_homelessness\\_in\\_the\\_united\\_kingdom\\_2018.pdf](https://www.crisis.org.uk/media/238823/reframing_homelessness_in_the_united_kingdom_2018.pdf)

<sup>55</sup> Shelter, 2018. What causes Homelessness? Available at: [http://england.shelter.org.uk/campaigns/why\\_we\\_campaign/tackling\\_homelessness/What\\_causes\\_homelessness](http://england.shelter.org.uk/campaigns/why_we_campaign/tackling_homelessness/What_causes_homelessness)

<sup>56</sup> Homeless Link, 2018. Introduction to strength-based best practice. Available at: <https://www.homeless.org.uk/introduction-to-strengths-based-practice>

Oxford). Those who had experienced homelessness said they felt like they were being moved around and “made someone else’s problem.”

*Local connection policies nationally create a type of monopoly board, where people are just being moved round and round without being able to settle. No one is taking responsibility to help.*

**Person who previously experienced homelessness in Oxford**

198. The Review Group wish to see the Council actively reframing the discussion on homelessness, together with the City Conversation, to highlight the net positive contribution these individual people can make to Oxford. This may be through the skills they can offer, the volunteering they contribute and the social networks they contribute too, for example.
199. Using the example of international migration, the Migration Observatory at the University of Oxford says “there is evidence from multiple sources showing that attitudes [towards immigration] have softened in recent years.” This is because the public consensus on immigration is changing to recognise the benefits it can bring,<sup>57</sup> and the Council should champion the same narrative for people experiencing homelessness. Members believe that the Council should also more frequently highlight the experiences and views of people experiencing homelessness locally to help develop a better public understanding of the complexities around homelessness. This aligns with recommendations made by other organisations elsewhere.<sup>54</sup>

**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.**

### **Homelessness experience within the workforce**

200. As part of this shift towards a net positive view of people experiencing homelessness, and a wider representation of their views within Council communications, the Review Group sees value in having an officer within the workforce who has experienced homelessness. It is recognised however that this may already be the case, and that it would be inappropriate to ask applicants or serving staff whether they have experienced homelessness. There is a clear value in recruiting directly from commissioned service providers, who already have a strong grasp of the local homelessness context, and a good understanding of the related complexities.
201. It is asked however that where information about a person’s experience of homelessness is forthcoming, that it be given due weight in the recruitment process. The Review Group heard that the Greater Manchester Combined Authority had specifically targeted people experiencing homelessness for a role within their support function. In engaging with people experiencing homelessness, the Review Group themselves were

<sup>57</sup> EconomicsHelp, 2017. Impact of immigration on UK economy. Available at: <https://www.economicshelp.org/blog/6399/economics/impact-of-immigration-on-uk-economy/>

critiqued for not having had experienced homelessness, to the knowledge of the participants.

**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.**

### **Communicating about services and the Local Connection Policy**

202. Members of the Review Group had feedback about winter provision from residents last year regarding the Severe Weather Emergency Protocol (SWEP), which makes available emergency bed spaces for persons with and without a local connection in prolonged periods of severe weather. They said there was confusion among service users about where available beds were, and who was entitled to access the service. It is recognised however that some people continue to decline this service offer.
203. The Review Group believe that people could be better informed about the services that are available, and their entitlement to support. Feedback from the focus group with people experiencing homelessness indicated that the complexities of the Local Connection Policy were not well understood, and neither was the process of prioritisation. Broadly speaking, there were various misconceptions about the services available throughout the review, and the Review Group believe homelessness communications should be simplified and made more prominent.
204. The Review Group suggest two ways of addressing this issue. First, there was support among contributors to the review for a notice board to be installed in the City Centre specifically to support people trying to access homelessness support services. This is particularly important given that people experiencing homelessness may have less access to the internet. This would also be beneficial in demonstrating to the public how organisations in the City are working together to resolve the issue.
205. Secondly, there would be benefit in producing a simple printed guide to explain how the Local Connection Policy operates. The Review Group identified significant complexities in understanding how the policy is applied, and what the criteria were. There was also understandable confusion among service providers and people experiencing homelessness about the criteria, and this would be an easy way to better communicate the Policy.
206. The Review Group do not want to be prescriptive in their recommendations concerning communication, and believe that the evidence gathered from service providers and people experiencing homelessness in this review will enable the City Executive Board and officers to improve the current communication offer.

**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.**

## **Raising the profile of the Council's work**

207. To reflect the recent rise in the number of people sleeping rough on Oxford's streets, and the increased funding (both from MHCLG and the Council) for supporting these people, the Review Group believes there would be value in having a City Executive Board portfolio exclusively designated to homelessness. This would raise the profile of the issue and show that support for vulnerable rough sleepers is high on the Council's agenda. A review of the portfolio would also enable more time to be dedicated to engagement activities with people experiencing homelessness, and representing their views within the decision making process.
208. As with contract monitoring elsewhere within the Council, the Review Group believe there would value in the Board Member attending quarterly contract monitoring meetings that already take place between officers and commissioned services. This refocusing of the board portfolio supports the wider democratisation of the homelessness support function that is advocated for elsewhere in this report. The Review Group recognise however that the allocation of portfolio responsibilities to members of the City Executive Board is entirely a matter for the Leader of the Council who would have to consider this suggestion in the round.

**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.**

**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.**

## Chapter 5: Conclusion

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209. The Review Group warmly welcomes the good work that is already ongoing by the Council to prevent homelessness, and support people to find a sustainable route out of homelessness. The increasing funding and innovative practices that the Council continues to introduce is testament to the effort and dedication of councillors and officers in tackling this complex issue. The Review Group hopes that their work will be welcomed by the Council as a positive contribution to the evidence base for policy development, and the continued introduction of new ideas to confront homelessness.
210. It is hoped that the current Local Connection Policy will be revised, in line with the recommendations set out in this report, to provide a broader account of what it means to have a local connection to Oxford. The Review Group also encourage the Council to be clearer in its communications, including about the fact that the Council will actively exempt the most vulnerable homeless people from the local connection criteria. This paper also presents opportunities for further research and investigation to be undertaken in light of the conversations had with local and national experts in the field.
211. It is recognised that some recommendations may be more implementable than others, and that the time to implement each recommendation may vary significantly. Accordingly, the Review Group would be grateful if a progress update on each accepted recommendation could be brought to the Scrutiny Committee after 12 months of this report being submitted.
212. The Review Group's recommendations are intended to provide some practical measures for widening the inclusivity of the Council's policies and approach to homelessness, and it is hoped that their recommendations will be met with approval.