



Preventing Homelessness and Rough Sleeping in Enfield

2020 – 2025

Draft strategy for public consultation

Scope	This draft five year strategy for public consultation explains how we will work with partners to prevent and tackle homelessness and rough sleeping in Enfield. The strategy meets our obligations under the Homelessness Act 2002 for all housing authorities to have a homelessness strategy.
Approved by	<i>Following consultation, the draft strategy will be finalised and is scheduled to be taken to Cabinet for approval by December 2019</i>
Approval date	<i>The date of approval at Cabinet</i>
Document Author	Strategy, Partnership, Engagement and Consultation Hub
Document owner – Corporate	Joanne Drew, Director of Housing and Regeneration
Document owner – Portfolio holder	Cllr Gina Needs, Cabinet Member for Social Housing
Review	A new cross-Council Officer-led Preventing Homelessness Partnership will review performance against the measures of success identified in this strategy and will monitor performance against our strategy action plan on a six-monthly basis. This group will report progress to the Enfield Housing Advisory Group on a six monthly basis.

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Introduction

Homelessness has become a national emergency and in no place is this clearer than Enfield. Homelessness has no place in the borough that we want to build.

Since our last strategy was produced in 2013, homelessness has increased across the country and at a significant rate locally. At March 2019, Enfield had 3,410 households in temporary accommodation, a 74% rise since 2012. This makes us the second highest provider of temporary accommodation in England. Eviction from the private rented accommodation continues to be the highest cause of homelessness in Enfield. We have also seen a significant rise in rough sleeping since 2017, giving us the fourth highest rough sleeper count in London in 2018.

The causes of homelessness are complex and addressing the rise in homelessness is particularly challenging due to a lack of good quality, affordable housing in the private rented sector and a very limited stock of social rented homes, which continues to decrease year on year through Right to Buy.

The scale of these challenges means that we require a step-change in the way we work across the Council, with our partner organisations and in the community to prevent homelessness. Enfield's Preventing Homelessness and Rough Sleeping strategy sets out how we will move towards a culture where homelessness is everyone's business and how together we can support all residents to have a safe, stable place to live, now and in the future.

I am really pleased to be launching this draft strategy for public consultation to hear the valuable insights and views of the community and our partners.

Cllr Gina Needs
Cabinet Member, Social Housing

Vision

We want to end homelessness in Enfield.

This means ensuring that everyone has a safe, stable place to live. It means supporting residents to make informed choices so that they have a home they can afford, at the right time, which meets their needs. It means that if an individual or family is at risk of homelessness, they receive the support they need to prevent it.

We will deliver on this vision through the following five ambitions:

1) Treat people with empathy, dignity and respect

Supporting people with compassion, listening to their views and ideas and working with them, other services and the community to prevent and end homelessness together.

2) Make homeless prevention a priority for everyone

Working with the community, our partners and across the council to spot risks of homelessness early and take holistic action to prevent it.

3) Support people to access the right accommodation

Empowering local people to find suitable accommodation and driving up standards in the private rented sector.

4) Support people to plan for their lifetime housing needs

Helping people to think about how they can meet their housing needs now and in the future and respond to changing requirements over their lifetime.

5) End rough sleeping in Enfield

Working in partnership to positively engage with and support people who are sleeping rough and prevent this form of homelessness from happening.

We are delivering on these priorities to end homelessness alongside our Housing and Growth Strategy, which sets out how we will deliver more homes and better homes for Enfield where everyone benefits from the opportunities that growth can bring.

We cannot end homelessness alone. We know that we need more homes and better homes, but it is the communities who will live in these homes that are crucial to truly ending homelessness. We also need to work more closely with our statutory, voluntary and community partners at a national, regional and local level. Through partnership working, this strategy seeks to address the causes and consequences of homelessness and rough sleeping. This is key to achieving our overarching vision for housing and good growth in Enfield.

Homelessness Review

Whilst homelessness is increasing across England, homelessness in Enfield is rising at a considerable rate. Since 2012/13, the number of households accepted as homeless in Enfield has been consistently above the London average and in 2017/18, 786 households were accepted as homeless and were owed a full homelessness duty by the local authority.

Full Homeless Duty means that the Council has a legal duty to secure suitable accommodation for applicants who are:

- Eligible for assistance
- In priority need
- Unintentionally homeless

We are also seeing more households who are homeless or at risk of homelessness presenting with multiple and complex needs which puts increased pressure on homeless services.

At March 2019, there were 3,410 households in Enfield's temporary accommodation, a 74% rise since 2012, and making us the second highest provider of temporary accommodation in England. This indicates an average annual increase of 208 households since 2011/12. 77% of the families in Temporary Accommodation in Enfield have children. National evidence shows us that people living in temporary accommodation are more likely to have poor health outcomes and have worse educational attainment.

Priority need means if you are homeless and:

- Pregnant
- Have dependent children under 16, or under 19 if they are in full-time education
- homeless because of an emergency
- aged 16 or 17

You may also be in priority need if you are:

- elderly or have an illness or disability
- at risk of exploitation or have been in care
- at risk of violence
- homeless after leaving hospital, prison or the armed forces

Temporary accommodation is also costly to the local authority. In 2018/19, Enfield spent over £66m on the Temporary Accommodation service, with a net cost to the local authority of £7m. Whilst the Flexible Housing Support Grant meets some of the cost of temporary accommodation, the uncertainty of this grant every year means that we cannot plan for the longer-term, making it harder to put in place longer term approaches to preventing and addressing homelessness.

There has also been a very significant increase in rough sleeping in the borough since 2017. Reported numbers have increased from 7 in 2017/18 to 78 in 2018/19. This reported increase can be explained by an encampment being included in the 2018/19 count.

The key drivers of rising homelessness in Enfield are complex and interconnected. Eviction from the Private Rented Sector (PRS) is now the main cause for someone becoming homeless in Enfield and we have the second highest eviction rate in London. This sector has rapidly increased in recent years, from 22% of all housing in Enfield in 2012 to 27% in 2017. Between 2011 and 2018, PRS rents in Enfield increased by 37%.

Increased levels of inward migration, deprivation, low incomes and the limited supply of affordable social rented homes means that vulnerable and migrant

communities are increasingly reliant on finding accommodation in the private rented sector in Enfield and are exposed to these higher housing costs. At the same time, the Council is also reliant on the private rented sector for discharging our homelessness duty.¹ We are competing with other London boroughs for available temporary accommodation in Enfield: during 2017/18, just 44% of all placements were made by Enfield, with 56% being made by other boroughs.

Enfield is a low wage borough² and there is growing deprivation. Welfare reforms have had a significant impact, particularly for those living in the private rented sector, with Enfield having the fifth highest number of households impacted by the benefit cap nationally. In addition, changes to the way Local Housing Allowance (LHA) rates are calculated means that even those on a lower quartile rent do not have their full housing costs met by LHA.

This unique combination of drivers and pressures starkly demonstrates the scale of challenge that Enfield faces. The changes to the London housing market, alongside welfare reforms, means that, despite rising rents, Enfield is a comparatively affordable place to live for those on low incomes. This could mean the Borough's housing market is attracting lower income residents who are at greater risk of homelessness – with the proportion of London's Housing Benefit/Universal Credit claimants in the Private Rented Sector increasing in Enfield, while inner London boroughs' share is in decline.

Interviews with people who are homeless or at risk of homelessness in Spring 2019 showed that people move to Enfield for a variety of personal reasons and it is a change in personal circumstances such as sickness, loss of employment, benefits changes or pregnancy that can make private tenancies unaffordable. These interviews found that life changes resulted in people needing to move but finding

The Homelessness Reduction Act 2017 means that we must do more to identify homelessness early and work to prevent it. It extends the period an applicant is 'threatened with homelessness' to 56 days. We have a duty to provide all homeless applications with information and advice and to secure suitable accommodation for all homeless applicants, regardless of whether they are 'intentionally homeless' or 'priority need'. We must also carry out an assessment of the applicant and put in place a housing and support plan.

Duty to Refer means that certain public services must refer cases to homeless prevention services if they identify that someone is homeless or is at risk of homelessness. The new duty applies to:

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

¹ The Localism Act 2011 enables local authorities to fully discharge their statutory homelessness duty via a Private Rented Sector Offer.

² Our emerging economic development strategy seeks to address the borough's low wage economy and grow our local economy for the benefit of local people.

themselves unable to pay the rent of suitable properties.³

The Homelessness Reduction Act means that more people are entitled to help and that they will receive support earlier to help them stay in their homes or find suitable alternative accommodation before they become homeless. These reforms provide us with the opportunity for a cultural shift and to further develop a holistic approach to preventing homelessness that is person-centred and provides our residents with greater autonomy and choice. The Act also provides the opportunity to enhance partnership working and knowledge sharing to make the best use of all our resources.

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³ Smith Institute report on the drivers of homelessness in Enfield. 2019.

Ambition 1: Treat people with empathy, dignity and respect

People who are homeless or at risk of homelessness are at a stressful and difficult time in their lives. Whatever type of help they may be eligible for, and whatever the reasons for their homelessness, they need to be treated with compassion. This means all our staff need to treat people with empathy, dignity and respect.

We will take a whole-person and whole-family approach in how we deliver housing options and advice services. This means working collaboratively with the community, across the Council and with all our statutory, community and voluntary partners to address peoples' needs.

We are delivering on the following priorities to make sure we treat people with empathy, dignity and respect:

- Recruit, train and support a Housing Options and Advice workforce which works across services, with our partners and with the community to respond to people's needs sensitively, effectively and quickly.
- Through the development of a customer charter, equip the Housing Options and Advice workforce to meet the needs of vulnerable people with multiple complex needs.

Measuring success

We will know that our approach is working if we can evidence:

- An **increasing** proportion of people accessing Housing Options and Advice services give positive feedback on their experience of the services they received.
- Housing Options and Advice services experience a **decreasing** proportion of complaints.
- Housing Options and Advice services see a **reducing** number of repeat contacts.

Ambition 2: Make homelessness prevention a priority for everyone

If we want to end homelessness in Enfield, we must focus on preventing people from becoming homeless in the first place. We will build on existing homelessness prevention services, making sure that our services are designed to intervene at the earliest opportunity to prevent homelessness. We will work across council services, with our partners and local organisations and with the community to respond to links between poor housing, low income and poor health to help residents to build resilience to prevent homelessness.

Low financial resilience makes residents turn to the Council and access to benefits, and effectively dealing with debt and rent arrears can play a critical role in whether someone becomes homeless or not. Our work with Enfield Citizens Advice and co-location with staff from the Department of Work and Pensions (DWP) is helping us to support people early with these issues. We will continue to strengthen our early prevention and help offer for residents. Where we cannot prevent homelessness through income maximisation, services will be joined up and linked in with our partner organisations to work together and share information.

Enfield has a high percentage of residents on low incomes living in the private rented sector and these residents are at high risk of becoming homeless. We will support residents to sustain their tenancies and stay in their homes, empower residents to understand their rights and responsibilities and strengthen our tenancy sustainment services.

The second highest reason for residents becoming homeless is being asked to leave by family or friends. We are strengthening our mediation services and more people are now being supported to stay where they are until we have helped them to find different accommodation.

Our Voluntary and Community Sector organisations provide crucial support, advice and guidance, as well as practical support like food and accommodation for our homeless residents or those at risk of homelessness. We will strengthen our partnerships with these organisations to facilitate joined up working and make best use of resources to prevent homelessness. This thriving sector makes a significant contribution to supporting homeless residents and we want to increase the opportunities for even more residents to get involved and work with these organisations to end homelessness in Enfield.

We are delivering on the following priorities to make homelessness prevention a priority for everyone:

- Re-design our housing options and advice services to make sure we can intervene at the earliest opportunity to prevent homelessness and support people at risk in the private rented sector to sustain their tenancies.
- Create a network of services and support for people within their communities, taking a whole-person approach to preventing homelessness by tackling worklessness, debt and poor health outcomes, maximising income and building literacy and ICT skills.

- Use data smartly to understand the needs of our residents, identify who could be at risk of homelessness and take proactive action to prevent this at the earliest stage possible.
- Work with residents to provide tenancy sustainment support and intervention, that benefits the wider community, for all types of rented accommodation.
- Strengthen partnership working with Voluntary and Community Sector organisations to prevent homelessness within the community.

Measuring success

We will know that our approach is working if we can evidence:

- An **increasing** number of households are prevented from becoming homeless.
- A **reducing** number of people become homeless:
 - as a result of being evicted from private rented sector accommodation
 - as a result of being evicted from council or registered provider (housing association) housing.
 - as a result of family or friends no longer being willing or able to accommodate.
- A **reducing** number of people live in temporary accommodation:
 - Family households
 - Single households

Ambition 3: Support people to access the right accommodation

To prevent people in Enfield becoming homeless, and to support those who are currently homeless into stable accommodation, we must secure the right accommodation, and enough of it, to meet their needs. We will increase our housing supply, make sure that current housing is of good quality and take an approach that recognises the diverse needs of our residents, delivering on our Housing and Growth Strategy.

Given the scarcity of social rented homes, in most cases, we will discharge our statutory homelessness duty via a Private Rented Sector Offer (PRSO). This means that we will arrange for a private landlord to make an offer of an assured short-hold tenancy in the private rented sector for a period of at least 12 months.

Rising demand and rising market rents have increased the challenge of discharging the Council's homelessness duty using the private rented sector. Due to our comparatively low rents, we also face the challenge of other boroughs sourcing their private rented sector accommodation for temporary accommodation and prevention solutions within Enfield to meet their own pressures.

In this context, we need to take action to secure a range of accommodation to help local households to find suitable and affordable accommodation. We are committed to further strengthening partnerships with neighbouring boroughs and across London to make sure all residents achieve the best life outcomes; we believe this means staying in their communities, in the borough they call home. We urge the Government to reward councils who take this approach and provide financial incentives to encourage local authorities to place households locally. We aim to support local people to access appropriate accommodation in Enfield. In cases where we need to have discussions with households about moving further away, due to the challenges of sourcing local accommodation which people on benefits can afford, we will do so in line with our Temporary Accommodation Placement Policy.

In order to prevent homelessness and to help people move on from temporary accommodation, it is vital that we intervene in the market and improve conditions in the private rented sector. Residents in temporary accommodation make up two-thirds of the people on our Housing Register and many do not wish to rent from a private sector landlord because of concerns around insecure tenancies and poor conditions. However, for many people there is currently no other option available and we need to support people to access the best possible accommodation in this sector which they can afford. There are significant challenges in managing standards, lettings and poor housing conditions within the sector. We will work collaboratively with landlords to drive up the quality of private rented homes, and work with landlords to explore ways for the sector to offer more stable and longer-term tenancies.

Driving up standards in the private rented sector

We will encourage high standards and quality in the private sector by leading by example. We want to increase the local presence of Housing Gateway, an Enfield Council owned company, which buys and manages homes for homeless residents. We will be an exemplar landlord, providing stable and longer-term tenancies for

families. We also recognise that for some people, as their circumstances change, shorter tenancies might be more appropriate to provide them with flexibility. We will provide a range of products that meets the needs of our homeless residents.

We will engage with other private sector landlords and provide advice and guidance to support them to raise standards, as well as taking enforcement action to tackle rogue landlords and lettings agents. We intend to implement an additional and selective licensing scheme for private landlords to drive up standards and reward good practice in the sector, subject to the results of our public consultation.

We intend to move away from paying landlords incentives to let their properties. Wherever possible, we want to pay the deposit and months' rent in advance for people who are unable to access accommodation in the private rented sector due to these costs. This is more cost-effective, is less likely to drive up private sector rents and empowers tenants to take responsibility for their deposit to have the financial capacity to move in the future. We will support pan-London programmes that promotes this approach and ensures fairness and the best outcomes for homeless households. We also know that landlords are increasingly reluctant to rent homes to people receiving housing benefit and we want to work with central Government to change this as well as explore how we might intervene in the market at a local level.

As well as the scarcity of social rented homes, budget cuts from central government have reduced the level of funding for housing related support services, at a time when demand from people with additional support needs is increasing. As well as a significant increase in general needs affordable rented homes, we need more high quality, flexible and affordable housing options to help those with assessed care and support needs to live independently and to prevent them from becoming homeless.

Our Housing and Growth Strategy sets out how we are working to increase the range of different affordable housing options available, and how we will work to improve the offer of accommodation in the private rented sector.

We are delivering on the following priorities to support people to access the right accommodation:

- Deliver our Housing and Growth Strategy to increase the supply of affordable homes for local people.
- Increase the availability of quality best value private rented accommodation in Enfield.
- Increase the availability of quality best value temporary accommodation available in Enfield.
- Support and work with landlords and agents to improve standards of management within Enfield's private rented sector, whilst taking a strong approach to tackling poor conditions and stopping rogue landlords and letting agents.
- Encourage private landlords to offer greater security, certainty and stability for their tenants, especially families with children and vulnerable households and those with disabilities and additional support needs.
- Through our allocations scheme, continue to meet the Council's priorities for allocating our limited social rented stock, whilst increasing awareness that for

most people, the route out of homelessness will be into a private rented sector tenancy.

- Increase local access to high quality, flexible and affordable housing options for people with assessed care and support needs.

Measuring success

We will know that our approach is working if we can evidence:

- A **decreasing** number of households live in expensive nightly paid accommodation.
- An **increasing** number of households are moving into the private rented sector to prevent homelessness.
- An **increasing** number of households living in temporary accommodation move into sustainable housing:
 - into private rented sector accommodation
 - into social/ affordable rented housing
- A **reducing** number of people live in temporary accommodation:
 - Family households
 - Single households
- The net cost of temporary accommodation is **decreasing**.
- Households are spending a **decreasing** amount of time living in temporary accommodation.
- There are **no families** with children living in Bed and Breakfast accommodation for more than 6 weeks.
- An **increasing** number of grants are made for adaptations to council, housing association, private rented sector and owner-occupied accommodation.
- A **stable or increasing** number of households with assessed support needs are being allocated social rented homes via the Housing Allocation Scheme.
- A **reducing** number of people become homeless:
 - A **reducing** number of people become homeless as a result of being evicted from private rented sector accommodation
- A **reducing** number of people experience 1) delayed discharge from hospital and 2) delayed move-on from residential care/ specialist housing due to the need for specialist housing.

Ambition 4: Support people to plan for their lifetime housing needs

We will support and empower people to make positive decisions about their lives. This means supporting residents to take responsibility for their current housing needs, helping them recognise how their needs may change over their lifetime and supporting them to plan for those changes.

Our focus is to improve the information that is available to all residents. Ambitions 1 and 2 show how we will equip staff throughout the Council to provide information and advice, making sure that residents are treated with empathy, dignity and respect. We will also strengthen the information we provide online, in our civic buildings and in the community, making sure that all information is accessible and advice is targeted. By providing comprehensive, accessible and freely available information, residents will be able to take responsibility for their own housing needs.

This is important for everyone, but particularly so for people with additional care and support needs or vulnerabilities. We want to help these people to stay living independently in their own home, wherever possible. In some cases, this will mean helping people get practical support services coming to help them at home (known as 'floating support'), helping people to adapt to their home, or helping people move to another general needs home that helps them better manage their needs. This could include moving to somewhere where safeguarding concerns can be better addressed or moving to somewhere with ground floor or wheelchair access.

Those fleeing domestic abuse or those who are victims of hate crimes are at risk of homelessness. When there are concerns about abuse and one party needs to leave, this can result in the victims becoming homeless. We want to make it safe for those experiencing abuse to stay in their homes. Where that is not possible, we will make sure that victims of abuse have a safe place to stay.

We will work with all residents to understand what their needs are, listen to how they would like to address them, advise them about what options are available to them and support them to achieve positive change. Sometimes, this may mean helping people to think differently – for example, a social or affordable rented home or a lifetime tenancy may be their initial preference. We will give people the right information and support them to understand their housing options so they can make an informed choice about what is the right accommodation for them.

We will work hard to prevent people becoming homeless and from spending time in temporary accommodation. However, this is not always possible, and for households who are already in temporary accommodation, we will support them to move into suitable, longer-term accommodation and help them to make positive choices which will help build their resilience. In most cases, we will support residents in temporary accommodation to move into the private rented sector.

We are delivering on the following priorities to support people to plan for their lifetime housing needs:

- Support people earlier to plan ahead and make positive housing choices, clearly communicating the different housing options for people in different stages of their lives and at key transition points.
- Increase the range of advice and support given to all households approaching housing options and advice services, taking a targeted and person-centred approach by considering and responding to the needs of everyone in the household.

- Improve the support and advice we give to homeless households living in temporary accommodation in order to empower them to make positive choices about their future housing options and facilitate their transition to more permanent accommodation.

Measuring success

We will know that our approach is working if we can evidence:

- An **increasing** number of households are prevented from becoming homeless.
- A **reducing** number of people become homeless.
- A **reducing** number of people experience 1) delayed discharge from hospital and 2) a delayed move on from residential care/ specialist housing due to the need for general needs accommodation.
- Households are spending a **decreasing** amount of time living in temporary accommodation.

Ambition 5: End Rough Sleeping in Enfield

It is unacceptable for anyone to be sleeping rough and our aim is to end rough sleeping in Enfield completely.

In the past, Enfield has had very low numbers of rough sleepers and funding has reflected this. However, numbers have increased considerably in recent years, giving Enfield the fourth highest rough sleeper count in London in 2018.

As is the case for all forms of homelessness, preventing rough sleeping is everyone's responsibility. We are raising awareness across council services, with our partners and with the community. We must not view homelessness in isolation but understand that rough sleepers will have a range of complex needs. We will do this by strengthening links between homeless services and support services, like adult social care and mental health, to provide a rapid response. We will work collaboratively with relevant agencies, so we can support people who are sleeping rough to understand their options for suitable, sustainable and safe accommodation for the future and encourage them to engage with other relevant support services.

It is particularly important to work collaboratively with voluntary and community organisations that can gain the trust of people sleeping rough. This means identifying community groups with staff or volunteers who speak the languages of the people with whom we need to engage.

Rough sleepers are at risk of exploitation and abuse. We will train and support our rough sleeping outreach workers so that they are able to identify rough sleepers who are victims of modern slavery. Where cases are identified, we will refer the case to our Multi Agency Safeguarding Hub (MASH) and work collaboratively with adult social care to support victims.

Where rough sleepers have set up encampments on public parks and open spaces that we manage, we have a legal duty to ensure the health and safety of these people and anyone using these spaces. Our first step will be to engage with them, alongside relevant partners, to offer advice and support. Where this does not lead to rough sleepers accepting support or voluntarily moving on, we will take appropriate and proportional action in our role as a corporate landlord.

We are delivering on the following priorities to end rough sleeping:

- Deliver on the priorities for ambition one of this strategy, to make homelessness prevention a priority for everyone.
- Work in partnership to provide a rapid and responsive outreach service to help rough sleepers to access appropriate, safe accommodation and support.
- Increase the supply of supported accommodation for eligible rough sleepers.
- Improve our housing offer for single, homeless people and continue to drive up standards in the private rented sector.
- Offer support and assistance prior to taking any legal action to move people living in encampments or address antisocial behaviour, continuing to work collaboratively to address needs alongside any action we take.

Measuring success

We will know that our approach is working if we can evidence:

- An **increasing** number of people who are single and have non-priority homeless status are supported to stay in their existing accommodation or are supported to find alternative accommodation to prevent rough sleeping.
- A **reducing** number of people are sleeping rough.
- An **increasing** number of rough sleepers move into accommodation.

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Governance and measuring success

A new cross-Council Homeless Prevention Partnership Board will retain oversight and actively drive the delivery of this strategy. This group will be accountable for delivering the strategy action plan and reviewing the measures of success on a quarterly basis.

National, Regional and Sub-regional working

We are committed to working with national partners, with our partners across London and our neighbouring boroughs to compare and review current housing need and homelessness practices and identify opportunities for coordination and efficiencies wherever beneficial.

We do this through a number of different partnerships. We work collaboratively with neighbouring boroughs in sub-regional meetings, coordinated by the North London Housing Partnership. We work across London through participation in the Pan London Housing Needs Group. We are active members in the National Homeless Policy Network and utilise opportunities to work with London Councils and the Local Government Association. We will strengthen these partnerships and continue to make a contribution, always being led by the needs of our residents and residents in other boroughs. Through these partnerships we aim to:

- Improve services through sharing knowledge and best practice
- Create better services and efficiencies through joint working
- Identify gaps in service provision and work to ensure these are addressed
- Bid for funding opportunities to provide additional assistance for boroughs wherever possible
- Develop an excellent understanding of housing demand, needs and conditions across North and pan-London.
- Lobby for national policy changes that positively impact homeless people and those at risk of homelessness

A national response to the housing crisis: our key asks

The Government has begun to make positive steps in addressing the national homelessness crisis. Lifting the Housing Revenue Accounts borrowing cap means that councils will be able to build more social housing that are desperately needed. Proposals to create more stability in the private rented sector through banning no fault evictions and giving tenants more control will be vital in preventing homelessness.

Nevertheless, we believe that other major Government policies conflict with their efforts to reduce homelessness. This strategy shows that homelessness cannot be viewed in isolation and we would argue that until the Government takes a holistic approach to ending homelessness, we will never achieve this aim.

Funding

Despite significant increases in demand, councils are spending almost £1 billion less on homeless services compared with 2010. New funding does not close the gap left by other cuts, leading to new cost pressures that Councils must manage. Local authorities are left with no choice but to direct limited resources to acute and

crisis services, curtailing our ability to deliver the full extent of preventative interventions that we want to deliver.

We believe that funding models are too fragmented, too short-term and too uncertain – such as the Flexible Homelessness Grant. Councils cannot plan stable services for the long term but in addition, this fragmentation can have a negative impact for individuals who need stable, consistent and responsive services. The lifetime of this strategy and action plan is five years but short-term funding means that we cannot plan as effectively as we could to achieve our aims.

The Fair Funding Review provides Government with an opportunity to prevent and end homelessness through sustainable funding. We support the LGA and London Councils' concerns that homelessness is of such significance that it should not feature as part of the foundation formula but should have its own separate formula.

We argue for this as homelessness continues to rise significantly nationally and in Enfield. There is a clear mismatch between the distribution of the general population and the homeless population. London has 68% of England's total households in temporary accommodation but only has 16% of the total population – Enfield has the 2nd highest temporary accommodation rates nationally. The drivers of homelessness and their associated costs are complex; we must consider the interaction between the benefits system, the relative costs of living and rental costs. A separate formula would allow each local authority to secure adequate funding to combat homelessness, in line with local demand – this would particularly benefit Enfield, where the scale of homelessness poses considerable challenges.

We are calling on Government to commit to sustainably funding local authorities to deliver vital preventative homelessness services. This is particularly crucial for Enfield. High levels of both homelessness and the number of households in temporary accommodation mean that we continue to need to focus on the crisis stages of homelessness, and lack of adequate funding means we therefore cannot currently direct sufficient resources to preventing homelessness to the scale required.

Welfare Reform

Whilst Government has made some positive steps to address homelessness, welfare reforms, such as the introduction of Universal Credit, the benefit cap and changes to Local Housing Allowance (LHA), are contributing to increasing homelessness and undermining efforts nationally to prevent homelessness.

The increasing gap between LHA rates and private sector rents is a systematic driver of homelessness. Since 2015, most LHA rates across the country have been frozen. Prior to this, rates reduced from the 50th percentile to the 30th percentile – meaning that recipients can only afford the lowest rents in the market. This freezing of LHA, along with changes to how it is calculated, including extending the shared accommodation rate for single people from 25 years of age to 35, is a toxic combination. This poses serious challenges to any renter who is reliant on Housing Benefit for all or part of their rent. This is particularly relevant in cases where offenders are to be rehabilitated into the community and may result in larger numbers of individuals co-housed in challenging conditions, increasing the risk of re-offending.

In Enfield, even lower quartile private sector rents are higher than the LHA rate, from a room in a shared flat to a four-bed house. We know that the biggest cause of

homelessness is eviction from the private rented sector. Between April and December 2018, Enfield paid £890,452 in Discretionary Housing Payments as a top up to Housing Benefit to prevent homelessness. This is not a sustainable way to prevent homelessness.

As an indirect consequence, landlords are increasingly refusing to accept tenants who receive benefits.⁴ Such policies leave our most vulnerable residents with no choice but to turn to the Council for their housing needs. This is costly to the Council and has devastating impacts on these residents.

We are working with landlords and letting agents to promote good and responsible landlordism, but we need Central Government to take responsibility for policies that incentivise landlords to act poorly as well as for welfare reforms which are contributing to rising homelessness.

To truly prevent and end homeless, LHA rates must be unfrozen and must reflect the true cost of living in the private rented sector. We are calling on Government to restore rates to the median market rate and to reverse reforms to shared accommodation rates. We urge the Government to return to paying Housing Benefit directly to landlords and end discrimination against those claiming benefits.

The Government must develop policies that will positively impact our residents and ease pressure from services that are already stretched to breaking point.

H-click Reforms

Whilst we welcome the opportunity that the Homeless Reduction Act offers to change the culture of organisations to prevent homelessness, the additional administrative burdens have had an impact on our ability to effectively deliver services. There is a huge amount of data that is recorded via H-Clik and this provides potential opportunities to truly understand local need and direct policy through a robust evidence base. However, the system is complicated, resulting in errors and inaccuracies and it is not compatible with other data sharing systems. We will work with the Local Government Association, London Councils and the Ministry of Housing, Communities and Local Government, to simplify the H-Clik system, which will free up officer time to prevent homelessness.

⁴ Shelter 2018 <https://blog.shelter.org.uk/2018/08/ending-dss-discrimination/>

Appendix 1: Connected Strategies and Policies

Our Preventing Homelessness Strategy contributes towards our Corporate Plan to deliver a lifetime of opportunities in Enfield, by good homes in well-connected neighbourhoods; sustaining strong and healthy communities; and building our local economy to create a thriving place. It also links with a number of other local policies and strategies.

Relevant Enfield policies for the delivery of this strategy include:

- Housing Allocation Scheme
- Temporary Accommodation Placement Policy
- Discretionary Housing Payment Policy
- Intermediate Housing Policy
- Tenancy Strategy and Policy
- Housing Enforcement Policy
- Council Housing Rent Policy
- Housing Assistance Policy (Disabled Facilities Grant)

Our Preventing Homelessness Strategy links with the following Enfield strategies:

- Housing and Growth Strategy
- Economic Development Strategy
- Strategic Asset Management Plan
- Health and Wellbeing Strategy
- Children and Young People Plan
- Family Resilience Strategy
- Safeguarding Adult's Strategy
- Market Position Statement (Health and Adult Social Care)
- Customer Experience Strategy
- Violence Against Women and Girls Strategy (VAWG)
- Safer Stronger Communities Board (SSCB) Partnership Plan

Enfield Council launched the **Enfield Poverty and Inequality Commission (EPIC)** on 7th June 2019. This independent commission, facilitated on our behalf by the Smith Institute, will help us to understand the forces driving poverty and inequality in the borough and point the way to potential solutions locally. Following a period of engagement with local people, the Commission will publish recommendations in December 2019. Poverty and housing are closely linked, and the results of this commission will influence and inform the Council's delivery of this strategy.