

# **Westminster City Council: Review of Homelessness 2019**



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## Section 1: Introduction

- 1.1 This Homelessness Review provides an assessment of:
- The nature and extent of homelessness in Westminster
  - Who is most affected by homelessness and its causes and impacts
  - Activities to prevent and respond to homelessness and to support those at risk
  - The available resources
  - The legal framework and national and regional policy
  - Future levels of homelessness and the challenges ahead.
- 1.2 The Homelessness Act 2002 requires local authorities to prepare and update a homelessness strategy. However, as Westminster was deemed to be an excellent authority, it was exempt from this requirement from 2009. Instead, analysis of housing need and plans to tackle and prevent homelessness have been included in the council's annual Supply and Allocation Reports<sup>1</sup>. However, due to legislative changes, this exemption no longer applies and the formulation of a homelessness strategy is now a statutory requirement for all councils.
- 1.3 Before developing a homelessness strategy, councils are required to complete a review of homelessness in their area covering the issues outlined above. To develop this review, data from a range of external sources and council records have been used, which are referenced throughout and officers across the council and from partner agencies have contributed to it.
- 1.4 ***Defining homelessness***  
Homelessness can take many forms:
- **Rough sleeping:** this is the most visible form of homelessness and includes people bedding down on the streets or sleeping on public transport etc. Its causes are complex and as it requires a different response to other forms of homelessness it is therefore dealt with separately in Section 11.
  - **Statutory homelessness:** this is where people or households have approached the local authority as they are either threatened with homelessness or are actually homeless. Local authority legal duties towards these households are shown in Section 2.
  - **Hidden homeless:** these people and households are generally not included in official statistics as they may be staying with friends and family on a temporary basis, sleeping on their sofa for example. They may also be living in housing which should not be occupied for health and safety reasons.

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<sup>1</sup> [www.westminster.gov.uk/how-we-allocate-housing](http://www.westminster.gov.uk/how-we-allocate-housing)

## Section 2: An overview of the council's legal duties towards homeless households

- 2.1 The Homelessness Reduction Act (HRA) 2017 fundamentally changed councils' legal duties towards homeless households, which are summarised below:
- 2.2 **A duty to provide free advisory services** to anyone in the local area about a range of things, such as preventing homelessness and securing accommodation when homeless. These services should be designed to meet the needs of people using them. (HRA 2017)
- 2.3 Certain public bodies, which includes social services authorities, have a **duty to refer** any users of their services who may be homeless or threatened with homelessness to the relevant service within the council. (HRA 2017)
- 2.4 **A duty to assess homeless applications and agree a personal housing plan** with anyone that is eligible and homeless or threatened with homelessness. The plan should set out the actions both the applicant and the council will take, to help address their homelessness. (HRA 2017)
- 2.5 **A duty to prevent homelessness** when someone is threatened with it within 56 days. This applies to anyone who is eligible for assistance, regardless of whether they have a 'priority need' (see below for more information on priority need), found to be intentionally homeless or has a local connection to the area. The duty usually continues for 56 days, unless it is brought to an end by suitable accommodation becoming available for the person or household or they actually become homeless. (HRA 2017)
- 2.6 **A duty to relieve homelessness** when it could not be prevented, through the local authority taking reasonable steps to help an applicant secure suitable accommodation. This duty lasts for 56 days and it can generally only be brought to an end during this period if suitable accommodation is found which is available for at least six months. It applies to anyone with a local connection which is defined in law. If the local authority has reason to believe a homeless applicant may be eligible for assistance and they also have a 'priority need', then they must be offered interim or temporary accommodation at this stage. (HRA 2017, Housing Act 1996)
- 2.7 **A duty to provide housing** if homelessness could not be successfully prevented or relieved. This is known as the 'main housing duty' and is only owed to applicants who are eligible, have a 'priority need' for accommodation and are not homeless intentionally. Only certain people are considered to be in 'priority need', such as those who are pregnant, have children or are vulnerable in some way, such as because they are elderly, have a mental or physical illness or disability, have been in prison or care, are a young person or have become homeless due to domestic abuse. This duty is generally only brought to an end by the offer of a 'suitable' home, which is defined as social rented housing provided by a council or a registered provider for

those that were accepted as homeless before 9<sup>th</sup> November 2012. For those accepted after this date it can also include the offer of a private rented tenancy for at least 12 months. (Housing Act 1996, Homelessness Act 2002, Localism Act 2011)

- 2.8 Where an applicant has no local connection with Westminster but has a local connection with the district of another authority, the applicant's case can sometimes be referred to that other authority, either at the 'relief duty' stage or at the 'main housing duty' stage. (HRA 2017, Housing Act 1996)
- 2.9 Alongside this is also a duty to **provide interim or temporary accommodation**, if more permanent accommodation is not available immediately. All accommodation offered to homeless households must be 'suitable' and statutory guidance and secondary legislation sets out what this means and the factors that have to be considered when making an offer. For example, it is unlawful for households with children to be offered emergency non self-contained accommodation (a bed and breakfast hotel for example) for more than six weeks. (Housing Act 1996, Homelessness Act 2002, Homelessness (Suitability of Accommodation) order 1996)
- 2.10 Local authorities also have a range of duties throughout the statutory homelessness process and they must provide the applicant with **written details of the decisions they have made**. Applicants must be made aware that they have the right to request a review of these decisions and how to submit them. (HRA 2017, Housing Act 1996)
- 2.11 There is also a general duty on every local authority to **safeguard and promote the welfare of children** within their area who are in need and this can sometimes include the provision of accommodation, even when some of the other duties above don't apply. (Children Act 1989, Children Act 2004)
- 2.12 Local authorities also need to comply with the **public sector equality duty**. That duty requires authorities to integrate equality considerations into the exercise of their functions. (Equality Act 2010)
- 2.13 Councils also need to take account of the statutory Homelessness Code of Guidance for local authorities which was last updated in April 2019.
- 2.14 The duty to complete a homelessness strategy and review is set out in the Homelessness Act 2002.

## Section 3: The national and regional policy environment

### 3.1 National policy

The Homelessness Reduction Act (HRA) 2017 represents the most significant national policy change in recent years. At the time of completing this review there were several uncertainties in relation to national policy which could affect levels of homelessness and responses to it:

- **The migration to Universal Credit.** Full rollout for all customers in Westminster is currently expected to start in late 2020. It is not clear if there will be any further changes to Universal Credit or to this timetable, as in January 2019, Government announced a pilot of 10,000 households transferring onto Universal Credit and that it was taking a 'test and learn' approach<sup>2</sup>. This follows a range of concerns about the benefit and its impact.
- **Whether the Local Housing Allowance (LHA) freeze will continue** after 2019/20, as this marks the end of the four-year freeze. LHA rates in Westminster generally do not meet rent levels and the LHA cap is also a significant factor in causing homelessness in Westminster (see Section 8).
- **Funding for local authorities to implement the HRA 2017.** Councils received new funding to implement the Act for two years until March 2020, after which it is intended to pay for itself due to a reduction in homelessness acceptances and associated costs. Implementation of the HRA 2017 is also funded currently by a Flexible Homelessness Support Grant, which was introduced to replace the temporary accommodation management fee and any other activities to prevent homelessness, but the continuation of this beyond 2019/20 is uncertain.
- **The long-term funding arrangement for temporary accommodation.** Currently councils can claim subsidy for temporary accommodation rents up to 90% of 2011 LHA levels. It was thought that this arrangement would change with the implementation of Universal Credit (as the LHA level would reduce to current levels), however Government has announced that the housing element of Universal Credit will not apply currently for households in temporary accommodation. It is not known if this is a long-term arrangement or if a new subsidy arrangement will be proposed.
- **The long-term availability of Discretionary Housing Payments (DHP).** DHP helps residents on Housing Benefit and Universal Credit to pay their rent if their entitlement does not fully cover it. While not a long-term solution it can help to delay homelessness. In the summer budget of 2015, Government set out the national DHP budget which is £800m over five years: £170m in 2018/19, £155m in 2019/20 and £140m in 2020/21. Westminster has received one of the highest allocations of DHP given the impact of welfare reform being most pronounced in high value areas, but its allocation of national funding has reduced due to a change

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<sup>2</sup> [www.gov.uk/government/news/amber-rudd-sets-out-fresh-approach-to-universal-credit](https://www.gov.uk/government/news/amber-rudd-sets-out-fresh-approach-to-universal-credit)

to the formula in the way allocations are calculated (see table 20 in Section 9). Both the long term national allocation and Westminster's own allocation are therefore uncertain.

- **Changes to the national formula to determine funding levels for councils.** Proposed changes could result in Westminster's core funding from Government being reduced, which could have an impact on all council services if it goes ahead.

### 3.2 **Regional policy**

The London Housing Strategy<sup>3</sup> was published in May 2018 and it outlines the Mayor's main policy approach in relation to homelessness and rough sleeping which includes:

- Lobbying for councils to have adequate funding to implement the HRA 2017 and for temporary accommodation.
- Investing in accommodation for homeless Londoners and working with councils to coordinate procurement.
- Expecting councils to meet their obligations to inform other councils when they place homeless households outside their area and to have clear policies about the provision of accommodation.
- Helping to ensure that homeless veterans receive support as set out in the national Code of Guidance.
- Leading the No Nights Sleeping Rough taskforce.
- Producing a plan of action which outlines what more the Mayor and partners can do to tackle rough sleeping with existing resources.
- Commissioning a range of pan-London services.

- 3.3 As part of this review the council has considered its existing policies and they are in line with the Mayor's London Housing Strategy 2018. With regards to rough sleeping the council has a place on the No Nights Sleeping Rough Taskforce and works in partnership with the Mayor on rough sleeping issues across London.

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<sup>3</sup> [www.london.gov.uk/sites/default/files/2018\\_lhs\\_london\\_housing\\_strategy.pdf](http://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf)

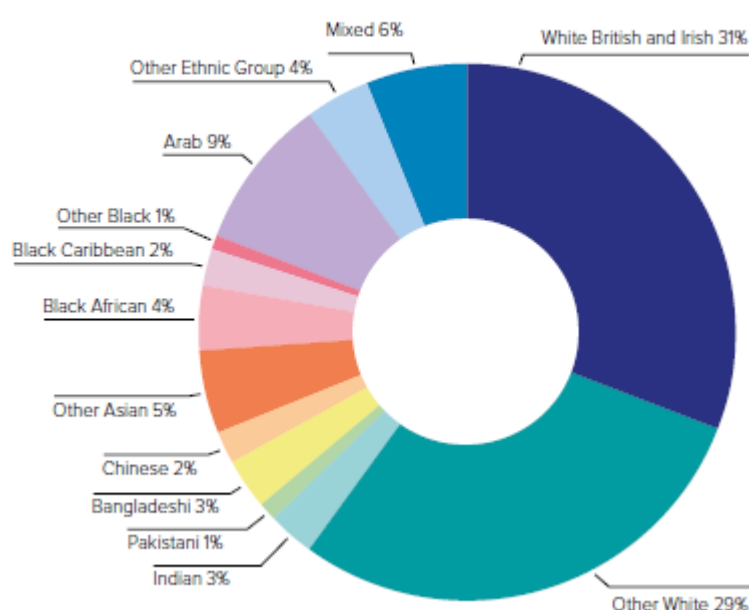
## Section 4: An overview of Westminster's population and housing market

### Key findings:

Westminster has an unusual tenure structure in that it has a very large private rented sector and lower levels of owner occupation compared with the rest of London. Social housing makes up around one quarter of the stock. High levels of population churn, second home ownership and short lets are other characteristics of the housing market. The population is diverse and there are areas of deprivation, mainly in the north of Westminster. Homes to privately rent and buy are amongst some of the most expensive in London and are unaffordable to those with lower and moderate incomes. Combined, many of these factors present particular challenges in preventing and responding to homelessness in Westminster.

- 4.1 Westminster has a population of 247,600 (of which 44,200 are children) made up of 121,000 households<sup>4</sup>. Only 19% of households have children. GLA projections estimate that the population will increase by 7% by 2030. Its population is diverse as the graph below shows.

Figure 1: Westminster's population by ethnic origin



Source: GLA 2016-based ethnic group population projections

- 4.2 There is significant population churn in Westminster: between June 2016 and 2017, over 25% of the full time resident population moved in or out of the city<sup>5</sup>. Large

<sup>4</sup> GLA population estimates 2019

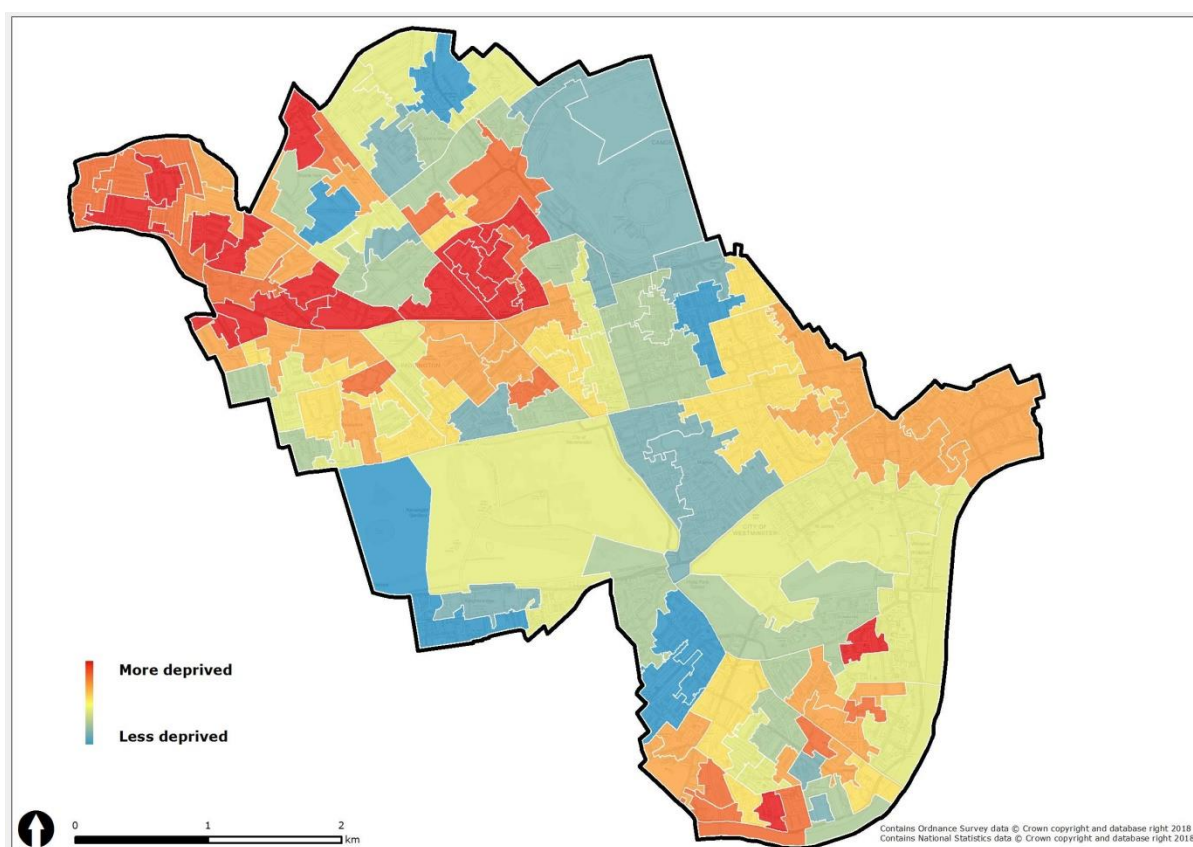
<sup>5</sup> 2017 Components of Change, ONS Mid Year Estimate series, 2018



numbers only live in the city part time and around 12% of properties have no full time resident which compares to 3.6% across England<sup>6</sup>.

- 4.3 The average Westminster income is £55,559, the median is £42,500 and the lower quartile is £24,673<sup>7</sup>. There are areas of deprivation which are mostly concentrated in the north of the city as figure 2 shows. The number of households receiving Housing Benefit in Westminster has fallen since 2012, since welfare reforms were introduced, from over 40,000 to around 21,000<sup>8</sup>.

*Figure 2: Areas of deprivation in Westminster*



Source: MHCLG Index of Multiple Deprivation 2015

- 4.4 The tenure structure in Westminster is unusual, with a very large private sector and smaller levels of owner occupation compared with the London average. Similarly to London as a whole, just over a quarter of the stock is social rented and there are low levels of intermediate housing.

<sup>6</sup> Census 2011

<sup>7</sup> CACI household income data 2019

<sup>8</sup> Local Housing Benefit data

*Table 1: Tenures in Westminster and London*

	<b>Owned</b>	<b>Private rented</b>	<b>Social Rented</b>	<b>Other</b>
Westminster	31%	40%	26%	3%
London	48%	25%	24%	3%

Source: Census 2011

- 4.5 Nearly 40% of Westminster homes have one bedroom which is higher than the London average of 22%<sup>9</sup>.
- 4.6 Properties to buy are some of the most expensive in London with lower quartile property prices estimated to be 19 times lower quartile incomes<sup>10</sup>. Land for development is limited, costly and there are competing demands on it.

*Table 2: Property prices in Westminster and London*

		<b>Beds</b>		
		<b>1 (flat)</b>	<b>2 (flat)</b>	<b>3 (house)</b>
Westminster	Lower quartile	£426,875	£625,000	£965,000
	Average	£580,388	£945,303	£1,855,006
London	Lower quartile	£250,000	£318,500	£400,000
	Average	£349,267	£461,387	£551,579

Source: Hometrack April 2019

- 4.7 The private rented sector is the largest in England at an estimated 53,000<sup>11</sup> properties and properties to rent include some of the most expensive in London. For example, renting a two bedroom home at the lower end of the market would require a gross income of £97k<sup>12</sup>.

*Table 3: Private rents in Westminster*

		<b>Beds</b>			
		<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>
Westminster	Rents per week: 30 <sup>th</sup> percentile*	£375	£525	£724	£924
	Rents per week: Median	£425	£624	£894	£1,200
London	Rents per week: 30 <sup>th</sup> percentile*	£264	£322	£381	£462
	Rents per week: Median	£306	£375	£450	£576

Source: Hometrack April 2019

\*The bottom 30% of rents

<sup>9</sup> Census 2011

<sup>10</sup> Hometrack April 2019

<sup>11</sup> Based on MHCLG estimates of the rented sector overall and excluding social rented housing

<sup>12</sup> Based on a rent of £525 per week and housing costs not exceeding 40% of net income and net being 70% of gross

- 4.8 There are also estimated to be over 8,000 active short lets<sup>13</sup> in Westminster of which 79% of these are whole property lets with the remainder being rooms in homes. Short lets can reduce housing supply for permanent residents.
- 4.9 Council tax records shows there are 476 empty properties in Westminster, which is less than 0.50% of the total stock. Identifying the number of empty properties and those which have been empty long term is difficult, as there is no incentive for owners to report them to the council. Local Council Tax data suggests that 156 properties have been empty for more than 2 years.
- 4.10 Combined these factors mean it can be harder to prevent and respond to homelessness in Westminster compared with other areas.

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<sup>13</sup> Inside Airbnb 2019 (an open source data tool)

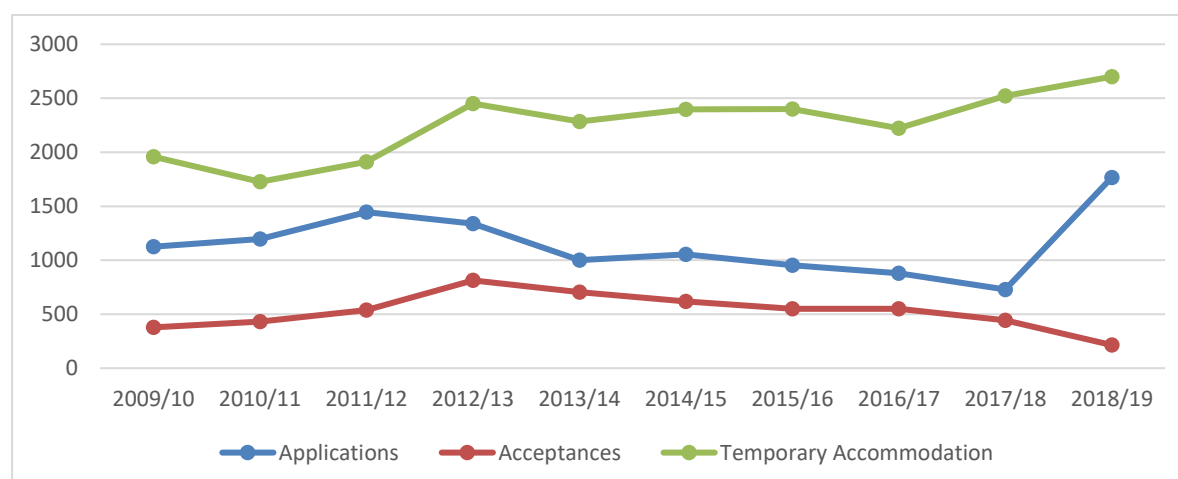
## Section 5: The scale of homelessness in Westminster: an overview

### Key findings:

Nearly 5,000 households contacted the council's Housing Solutions Service during 2018/19 which is nearly 4% of all Westminster households. Before 2009/10 homeless applications were declining, but they rose in 2010/11 and peaked in 2011/12, largely due to welfare changes. Similarly, acceptances also rose and peaked in 2012/13. Since then, and until March 2018, they were reducing gradually. However, the Homelessness Reduction Act 2017 marks a totally new approach in responding to homelessness making direct comparisons between 2018/19 and previous years difficult. The first year of implementation of the Act has seen acceptances reduce, applications rise significantly and temporary accommodation use increase.

- 5.1 Before the Homelessness Reduction Act 2017 (HRAAct) which came into effect from April 2018, the council received around 1,000 homeless applications each year, which is less than 1% of all households. The HRAAct 2017 totally changed the way in which homelessness is dealt with, so it is difficult to compare historic levels and trends with current ones. A homeless 'application', for example, is taken at a different stage under the HRAAct 2017, compared with past approaches. A key aim of the HRAAct 2017 is for earlier prevention work to lead to a reduction in acceptances.
- 5.2 Prior to 2009/10 homeless acceptances and applications were declining. However, they rose from 2010, driven largely by welfare reform, which resulted in more households living in the private rented sector being no longer able to afford their rent. Applications peaked in 2011/12 and acceptances in 2012/13 and since then acceptances have been declining gradually.

Figure 3: Homelessness activity over time



- 5.3 Section 12 looks at homelessness activity during the first year of the HRAAct 2017 in detail.

## Section 6: The impact of homelessness

### Key findings

The human impact of homelessness is significant, particularly on the health and wellbeing of children and families in temporary accommodation – where they can live for over 10 years waiting for social housing. The council spends over £23m each year on homelessness and rough sleeping services and nearly £5m alone on temporary accommodation as the subsidy arrangement doesn't meet its true costs.

### 6.1 Human impacts

Homelessness can be a devastating experience for anyone. Living in temporary accommodation can result in people feeling their lives on are 'on hold'. Waiting times in Westminster for social housing are long as table 4 shows and are due to the shortage of social housing to meet demand. Households needing larger homes could spend a significant proportion of their lives in temporary accommodation, which is often outside Westminster.

*Table 4: Waiting times for social housing*

Studio	1 bed	2 bed	3 bed	4 plus bed
2.5 years	1 year	10 years	16 years	34 years

Note: waiting times can vary depending on a number of factors, such as location, property type and priority group.

- 6.2 The impact can be particularly severe for certain people, particularly on their health and wellbeing and this is well evidenced, although it should be noted that research on the health impacts of homelessness often does not distinguish between people sleeping rough and those in temporary accommodation.

### 6.3 Children and families

It is not uncommon for families to be in temporary accommodation for many years before more permanent housing is available, and to move several times within temporary accommodation. This can be particularly unsettling for families and can affect health, well-being, behaviour and development. Research by Shelter in 2006 found that children who have been in temporary accommodation for more than one year are more than three times more likely to demonstrate mental health problems as non-homeless children. More recent research in 2017 found that homeless children's behaviour often changed, with younger children becoming withdrawn and older children becoming angry or refusing to do schoolwork. It also suggested that homeless children's relationships with their peers can suffer, as they miss out on extra-curricular activities and often feel like they can't fit in<sup>14</sup>.

- 6.4 The impact of homelessness on health has been shown to begin even before birth, with children born into homeless families more likely to have low birth weights,

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<sup>14</sup>[https://england.shelter.org.uk/media/press\\_releases/articles/as\\_schools\\_break\\_up\\_for\\_the\\_christmas\\_holidays\\_new\\_shelter\\_report\\_reveals\\_the\\_devastating\\_impact\\_of\\_homelessness\\_in\\_the\\_classroom](https://england.shelter.org.uk/media/press_releases/articles/as_schools_break_up_for_the_christmas_holidays_new_shelter_report_reveals_the_devastating_impact_of_homelessness_in_the_classroom)

more likely to miss their initial immunisations and less likely to be registered with a GP.<sup>15</sup> Currently there are 3,300 children living in temporary accommodation provided by the council in Westminster.

#### 6.5 ***Young people***

A 2017 report by the Local Government Association suggests there are high levels of mental health problems, self-harm, drug and alcohol use amongst young homeless people and that they are at risk of being drawn into a lifetime in the criminal justice, social care or health system.<sup>16</sup> This research is further corroborated by Centrepoin in 2018, which reported that 22% of the young homeless people that the charity had helped had self-harmed and 18% had attempted suicide.<sup>17</sup>

- 6.6 A toolkit which was produced in 2018 for public health nurses, to help inform them about young people affected by homelessness, highlighted some of the common reasons why young people who were homeless might experience poorer health. These included: young people not prioritising their health if they're struggling with housing or finances; young people missing out on letters relating to their health if they are moving regularly; and a lack of knowledge about local services when they move to a new area.<sup>18</sup>

#### 6.7 ***People with mental health problems***

The evidence clearly indicates that mental health issues are both a cause and a consequence of homelessness, which can make it difficult to establish the direct impact of homelessness on mental health. However, research carried out for the London Borough of Newham, focusing on the experiences of a small number of people living in temporary accommodation, revealed that 89% of the 32 people who were interviewed felt that their mental health was worsening because of their time in temporary accommodation.<sup>19</sup>

- 6.8 Other research shows that mental health issues in homeless people are often present alongside, and are influenced by, other issues including physical health problems and substance misuse issues. For instance, a report in 2015 by St Mungo's Broadway on homelessness and health found from a survey of 1,940 people using its hostels and supported housing that 44% of respondents had a physical problem, 44% had a mental health diagnosis or other issue, 56% used drugs or alcohol problematically, and 21% had all three issues present at the same time.<sup>20</sup> Also a Local Government Association (LGA) report on health and homelessness highlighted

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<sup>15</sup> [https://www.qni.org.uk/wp-content/uploads/2016/09/homelessness\\_babies\\_families.pdf](https://www.qni.org.uk/wp-content/uploads/2016/09/homelessness_babies_families.pdf)

<sup>16</sup> [https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS\\_v08\\_WEB\\_0.PDF](https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF)

<sup>17</sup> <https://www.bmj.com/content/360/bmj.k214/rr-2>

<sup>18</sup> [http://www.youngpeopleshealth.org.uk/wp-content/uploads/2018/10/FINAL-HomelessToolkit\\_links.pdf](http://www.youngpeopleshealth.org.uk/wp-content/uploads/2018/10/FINAL-HomelessToolkit_links.pdf)

<sup>19</sup> <https://www.health.org.uk/blogs/bad-housing-leads-to-bad-health-%E2%80%93-93-time-for-a-joined-up-approach-in-greater-manchester>

<sup>20</sup> <file:///Q:/Homeless-Health-Matters-Impact-Report-1.pdf>

that common mental health problems are more than twice as high amongst homeless people as within the general population.<sup>21</sup>

## 6.9 **Older People**

The health impacts of homelessness on older people is not as well researched as the impacts for young people. However, the LGA report on homelessness and health points to studies which have shown that existing health conditions are likely to be exacerbated by being homeless. Older people who are homeless are also more likely to experience conditions such as depression and dementia.<sup>22</sup> A King's Fund report on health and housing quality emphasised how poor housing quality can increase risks for older people, such as cold and damp in the winter and the risk of falls and household accidents.<sup>23</sup>

## 6.10 **Financial impact**

As table 5 shows, the council spends over £23m per year on homelessness and rough sleeping services. The gross costs of providing temporary accommodation alone costs over £48m per year.

*Table 5: Spend on homelessness and rough sleeping activity in Westminster 2018/19*

	<b>2018/19</b>
	<b>£000</b>
Housing Solutions Service including homelessness prevention activities*	£6,771
Temporary accommodation (net spend after income from rent charges and Flexible Homelessness Support Grant)	£4,753
Trailblazer service (and early prevention service)*	£328
Rough Sleeping Services	£6,804
Other miscellaneous projects*	£121
Supported Housing	£7,230
<b>Expenditure</b>	<b>£26,008</b>
*Some or all funded from Government grant successfully bid for	
Grant funding from Government	£2,869
<b>Net council spend on homelessness prevention and services</b>	<b>£23,140</b>

<sup>21</sup> [http://thp.org.uk/sites/default/files/health\\_and\\_homelessness\\_report.pdf](http://thp.org.uk/sites/default/files/health_and_homelessness_report.pdf)

<sup>22</sup> [https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS\\_v08\\_WEB\\_0.PDF](https://www.local.gov.uk/sites/default/files/documents/22.7%20HEALTH%20AND%20HOMELESSNESS_v08_WEB_0.PDF)

<sup>23</sup> [https://www.kingsfund.org.uk/sites/default/files/2018-03/Housing\\_and\\_health\\_final.pdf](https://www.kingsfund.org.uk/sites/default/files/2018-03/Housing_and_health_final.pdf)

## Section 7: Those most affected by homelessness in Westminster

### Key findings:

Overall those approaching the Housing Solutions Service are more likely to be living in the more deprived areas of Westminster. Homeless households in temporary accommodation are more likely to be, compared to their share of the Westminster population, from a Black, Arab, Other and Asian ethnic background, women and lone parents.

Analysis of those applying as homeless since the HRA 2017 indicates a changing customer base when compared to those in temporary accommodation. During 2018/19 more single people made homeless applications (56%) than families (44%) and 60% of applications made by single people were from men. Black, Arab and Asian households were over represented amongst homeless applicants in 2018/19 and White households were under represented, although less so than when compared with the temporary accommodation population.

Homeless applicants are more likely to have low incomes and receive benefits, although they are not necessarily unemployed (around 50% of households in temporary accommodation are working).

- 7.1 Each year the council publishes a Supply and Allocation of Social Housing Report which includes analysis of groups in need of social housing, including homeless households, compared to the Westminster population<sup>24</sup>.
- 7.2 Analysis of households in temporary accommodation shows them more likely to be, compared to the overall population:
- From a Black, Arab, Other or Asian background
  - In the 25 – 44 age group, that is more likely to have children
  - Women
  - Households with children
  - Lone parents (that are more likely to be women)
  - In need of larger homes, with more bedrooms, compared with other groups in need of housing
  - Have low incomes, c92% of households in temporary accommodation receive housing benefit.
- 7.3 Looking at those applying as homeless since the HRA 2017 gives an indication of how customers may be changing since the Act although it is too early to identify long term trends. The following tables look at the temporary accommodation population compared with applicants for 2018/19, although it should be noted these are not 'like for like' comparisons.

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<sup>24</sup> [www.westminster.gov.uk/how-we-allocate-housing](http://www.westminster.gov.uk/how-we-allocate-housing)



## 7.4 Ethnicity and nationality

Table 6a: Homeless households by ethnicity

<b>Ethnicity</b>	<b>Homeless Households in temporary accommodation (lead applicants)*</b>	<b>Homeless Households (Applicants) 2018/19 (lead applicants)</b>	<b>Westminster population (GLA Ethnic Projections for 2018 – persons)</b>
White	21%	29%	60%
Black	25%	26%	7%
Arab	21%	21%	8%
Asian	16%	10%	12%
Mixed	3%	6%	5%
Other (includes Chinese)	13%	8%	6%

*\*Doesn't include households where ethnic origin is unknown*

Table 6b Homeless households by ethnicity in detail

<b>Ethnicity</b>	<b>Homeless Households (Applicants) 2018/19* (lead applicants)</b>	<b>Westminster Population (GLA Ethnic Projections for 2018 – persons)</b>
White: English/Welsh/Scottish/Northern Irish/British	19.7%	31%
White: Gypsy or Irish Traveller	0.08%	-
White: Irish	1.1%	-
Any other White background	8.4%	29%
Black: African	16.6%	4%
Black: Caribbean	6.8%	2%
Any other Black/African/Caribbean background	2.4%	1%
Arab	20.8%	8%
Asian: Bangladeshi	2.3%	3%
Asian: Indian	1.1%	3%
Asian: Pakistani	1.2%	1%
Any other Asian background	4.3%	5%
Mixed/Multiple ethnic groups: White and Asian	0.5%	-
Mixed/Multiple ethnic groups: White and Black African	0.8%	-

<b>Ethnicity</b>	<b>Homeless Households (Applicants) 2018/19* (lead applicants)</b>	<b>Westminster Population (GLA Ethnic Projections for 2018 – persons)</b>
Mixed/Multiple ethnic groups: White and Black Caribbean	1.7%	-
Any other Mixed/Multiple ethnic background	2.7%	5%
Any other ethnic group, including Chinese	9.0%	6%

\*The data does not include households where their ethnic origin is unknown

7.5 The groups most affected by homelessness during 2018/19, compared to their population share were:

- Black African
- Black Caribbean
- Arab
- Other.

7.6 The tables above show a greater proportion of applications from White households, during 2018/19 when compared with the temporary accommodation population and a lower proportion from the Asian and Other ethnic groups.

*Table 6c: Homelessness and nationality for applicants 2018/19*

	<b>Homeless Households (Applicants) 2018/19 (lead applicants)</b>	<b>Westminster Population (ONS Nationality Estimates, 2017-18)</b>
UK National	75%	67%
European Economic Area (EEA)	9%	17%
Non - European Economic Area (Non EEA)	16%	16%

7.7 Households from the EEA were under represented in homeless applications during 2018/19 while those from outside the EEA were comparable to their share of the Westminster population.

## 7.8 Age

Table 7: Homeless households by age

Age	Homeless Households in temporary accommodation (lead applicants)	Homeless Households (Applicants) 2018/19 (lead applicants)	Westminster Population (2017 ONS Mid-year estimates, for adult population)
16-24	7%	17%	13%
25-44	65%	54%	45%
45-64	25%	27%	27%
65-74	2%	3%	8%
75+	1%	1%	7%

- 7.9 The proportion of young people in temporary accommodation (aged 16 – 24) is below their population share, although applicants were over represented during 2018/19. The 25 – 44 age group are over represented, amongst temporary accommodation households and applicants during 2018/19 compared to their population share. This is the group that are most likely to have children. Older people are generally under represented.

## 7.10 Gender

Table 8: Homeless households by gender

	Homeless Households in temporary accommodation (lead applicant)	Homeless Households (Applicants) 2018/19 (lead applicant)	Westminster Population (2017 ONS Mid-year estimates)
Women	71%	48%	48%
Men	29%	52%	52%

- 7.11 The balance of men and women applying as homeless during 2018/19 was comparable to their respective share in the Westminster population. Notably 52% of applications were from men, which compares to 29% of men living in temporary accommodation.

## 7.12 **Sexual orientation**

*Table 9: Sexual orientation of homeless applicants 2018/19*

<b>Sexual orientation</b>	<b>%</b>
Gay / Lesbian	1%
Heterosexual	46%
Unknown/Prefer not to say	53%

*(Note information on the sexual orientation of households in temporary accommodation is not available)*

- 7.13 The Office of National Statistics estimate the Lesbian, Gay and Bisexual population of London to be 2.2-3%, while this is higher than the proportion of Gay/Lesbian people applying as homeless, it is not possible to make comparisons given the sexual orientation of 53% of applicants is unknown.

## 7.14 **Household composition**

*Table 10: Homeless households and household/family composition*

	<b>Homeless Households in temporary accommodation (lead applicant)</b>	<b>Homeless Households (Applicants) 2018/19 (lead applicant)</b>	<b>Westminster Population (2011 Census)</b>
Pregnant women	13%	See below*	See below**
Households with children	86%	44%	19%
Of which are lone parents	48%	8%	6%
Single people	14% (43% men 57% women)	56% (60% men 40% women)	81% (54% men 46% women)

\*Details about pregnancy are not collected at this stage. \*\*Information not available

- 7.15 Households with children were over represented in those applying as homeless during 2018/19 compared to their share of the Westminster population and single people were under represented. However, during 2018/19, 56% of applications were from single people which compares to 14% living in temporary accommodation. Notably during 2018/19, 60% of applications from single people were from men.

## 7.16 **Physical and mental health and support needs**

Looking at physical health less than 6% of homeless households living in temporary accommodation have members with a physical disability which impacts on the type of properties needed (see table 11). While city wide data is not directly comparable

with the categories above, it identifies that 9% of the working age Westminster population is estimated to have a serious or moderate physical disability<sup>25</sup>.

*Table 11: Homeless households need for different property types (living in temporary accommodation)*

	<b>Fully wheelchair accessible property needed</b>	<b>Property needed for those who use a wheelchair outside the home but can manage in the home without one</b>	<b>Level access property needed with no stairs</b>	<b>Non adapted property needed</b>
Homeless households in temporary accommodation	<1%	<1%	4%	95%

7.17 Analysis of those applying as homeless during 2018/19 (see table 12) shows greater proportions have a physical illness or disability (15%) which is more in line with the overall Westminster population. (Note: households are only categorised for the different types of properties in table 11 once they are accepted as homeless).

*Table 12: Households with physical and mental health issues and support needs (Homeless applicants 2018/19)*

	<b>%</b>
History of mental illness	9%
Physical ill health or disability	15%
At risk or experienced domestic abuse	8%
Offending history	3%
Other support needs	4%

7.18 Nine per cent of applicants during 2018/19 had (or had a household member with) a mental health issue. It is likely, however, that other applicants and members of their households may have mental health problems. A national survey conducted by Shelter of 2,000 people in temporary accommodation<sup>26</sup>, found that more than half said that they were suffering from depression and other mental health problems.

<sup>25</sup> PANSI information 2015

<sup>26</sup> [http://england.shelter.org.uk/data/assets/pdf/file/0012/40116/Living\\_in\\_Limbo.pdf](http://england.shelter.org.uk/data/assets/pdf/file/0012/40116/Living_in_Limbo.pdf)

Across Westminster, an estimated 16% of the working age population may have a common mental health issue<sup>27</sup>.

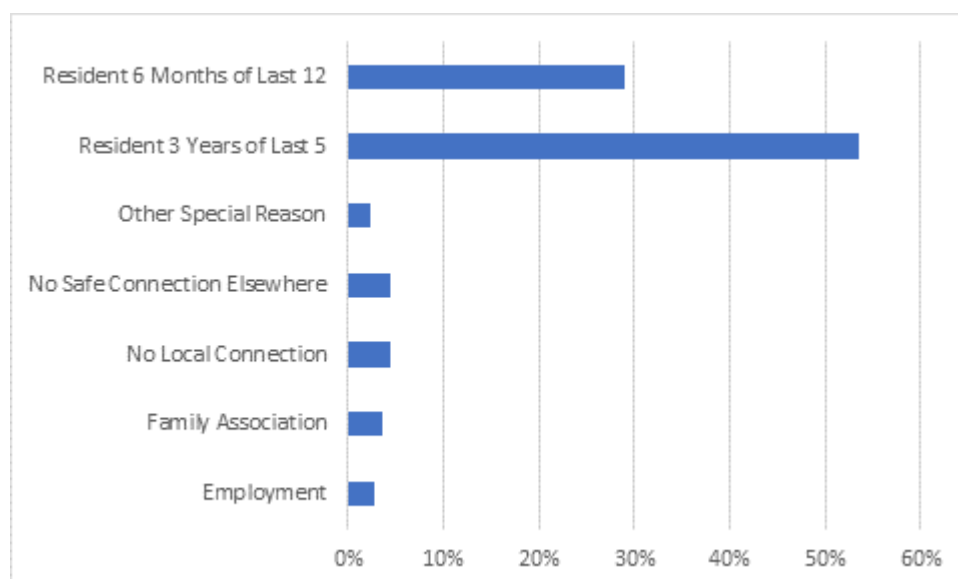
- 7.19 A relatively small proportion of applicants during 2018/19 identified themselves as having other support needs (4%). This however may under estimate those with actual support needs as sometimes these do not become known for some time, so the information is not captured at initial contact. Those with support needs can access supported housing or floating support.

7.20 **Connection to Westminster**

Local authorities must provide advisory services and prevent homelessness for anyone living in their area under the HRA 2017, regardless of their length of residency. Data is kept on the last known address but not on the length of residency in Westminster for those receiving these services. For the 'relief' and 'main housing' duty, households generally need to have a local connection to Westminster which is defined in law (see Section 2).

- 7.21 As figure 4 shows, the majority of households accepted as homeless during 2018/19 (54%) had been resident in the city for three out of the past five years and overall 83% had some residency connection to Westminster.

*Figure 4: Local connection to Westminster for households accepted as homeless 2018/19*



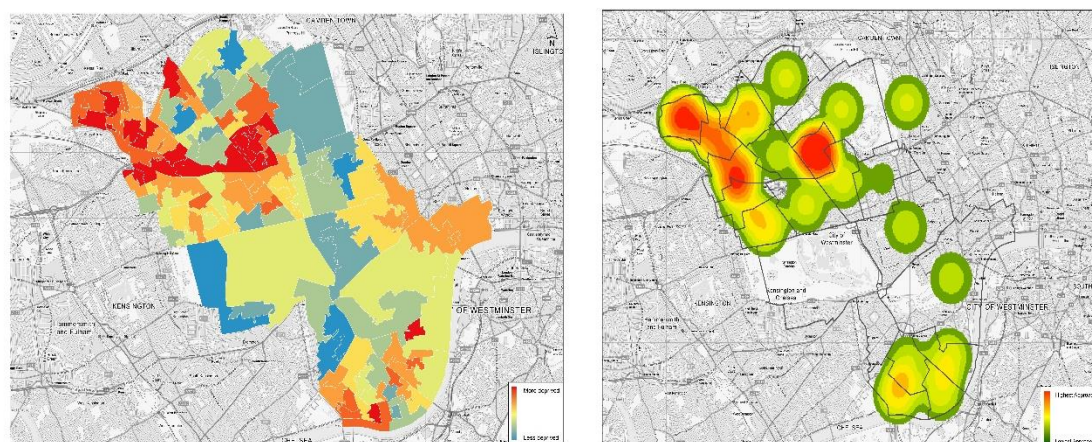
7.22 **Geography**

Homelessness in Westminster is strongly correlated with the level of deprivation in the local area as the following figure shows.

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<sup>27</sup> PANSI information 2015

Figure 5: Approaches to the Housing Solutions Service 2017 compared with the Index of Multiple Deprivation 2015



Index of Multiple Deprivation 2015

Approaches 2017

### 7.23 **Income**

Homeless households, and those threatened with it, generally have low incomes, for example at least 46% of applicants were in receipt of benefits in 2018/19. This figure may well be higher as it includes those unable to clarify their benefits. Sometimes when households apply as homeless they are unable to confirm the benefit they receive and this is established later.

- 7.24 Currently c50% of households in temporary accommodation are working either full or part time. As market rents are charged in temporary accommodation, nearly 100% of residents receive housing benefit.

Table 13: Households receiving benefits (Homeless applicants 2018/19)

Benefit	%
Disability Benefits	4%
Employment and Support Allowance	7%
Income Support	3%
Jobseeker's Allowance	5%
State Pension and/or Pensioner Credit	2%
Tax Credits	12%
Universal Credit	12%
No benefits claim made / not able to clarify benefit	54%
<b>Total in receipt of benefits (where known)</b>	<b>46%</b>

*Excludes housing benefit*

## Section 8: The causes of homelessness

### Key findings:

Homelessness can be a result of 'structural' factors such as unemployment or a private tenancy ending or 'individual' factors such as relationship breakdown, or it can be due to multiple causes. Family and friends being unable to accommodate a person or household is the main recorded cause of homelessness in Westminster and more could be done to understand it and establish if anything further can be done to prevent it. The ending of a private rented tenancy is the second main cause and is often due to a household being unable to afford the rent due to benefit levels not meeting rents, or by landlords simply leaving the sector. Relationship breakdown is the third most significant cause and again more could be done to understand when the council can intervene to prevent it.

Data on the causes of homelessness is however based on reasons for the loss of the last settled home and often the reason for it is more complex with risk factors starting at a much earlier stage, as the Early Intervention Trailblazer Service has identified. Their close working with people at risk of homelessness found for example low income people struggling in the private rented sector with arrears building up quickly. It also found low income working households to be at risk of homelessness.

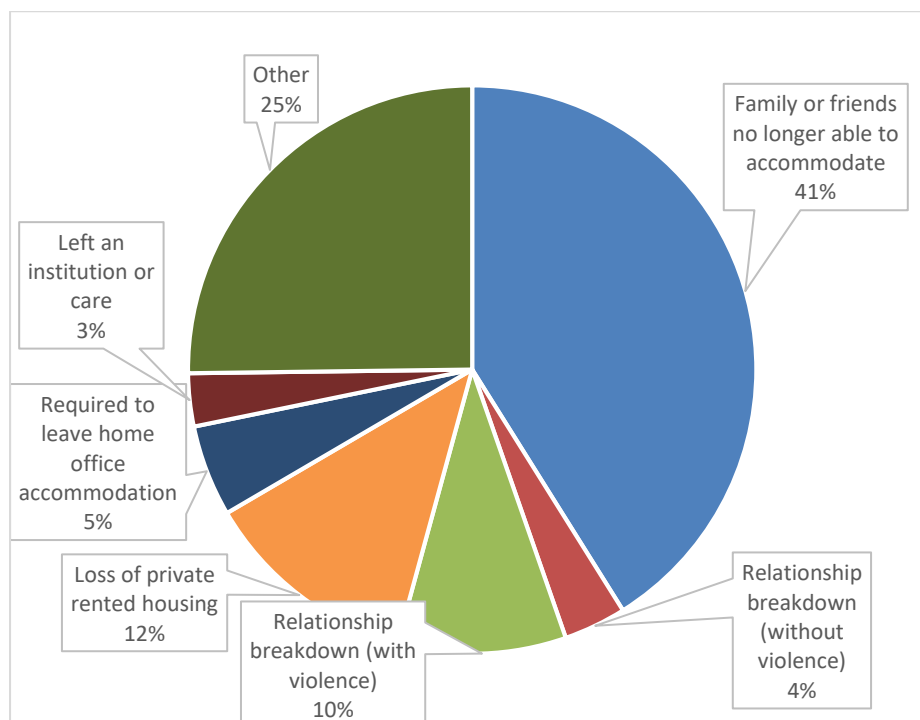
- 8.1 Homelessness can be caused by 'structural factors' such as unemployment, low income, loss of a private tenancy or the lack of affordable housing or by 'individual factors', such as relationship breakdown or illness, or it can be the result of multiple factors.
- 8.2 The following table and figures compare reasons for the loss of the last settled home at different points in time and they show that family and friends no longer being able to accommodate a person or household, the loss of private rented housing and relationship breakdown have been the top causes over time - and continued to be so in 2018/19. (Note the data for 2018/19 relates to homeless applications rather than acceptances).

*Table 14: Main causes of homelessness over time*

	<b>2009/10 Acceptances</b>	<b>2017/18 Acceptances</b>	<b>2018/19 Applications</b>
Family and friends no longer able to accommodate	41%	31%	44%
Loss of private rented housing	12%	22%	26%
Relationship breakdown	14%	15%	16%



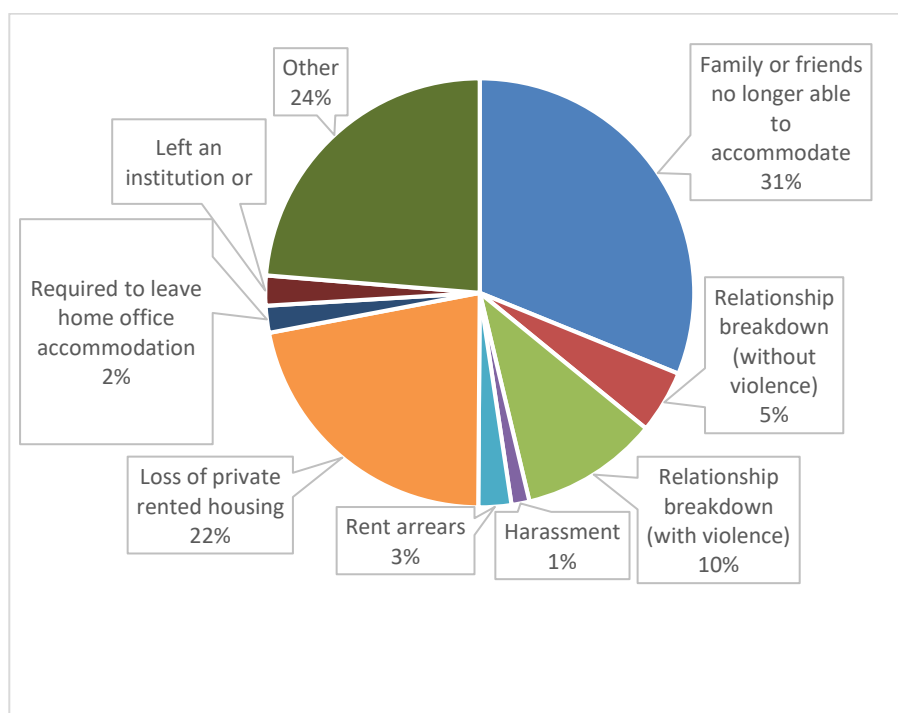
Figure 6: Reasons for the loss of last settled home for acceptances 2009/10



Source: PIE statistics

[www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness](http://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness)

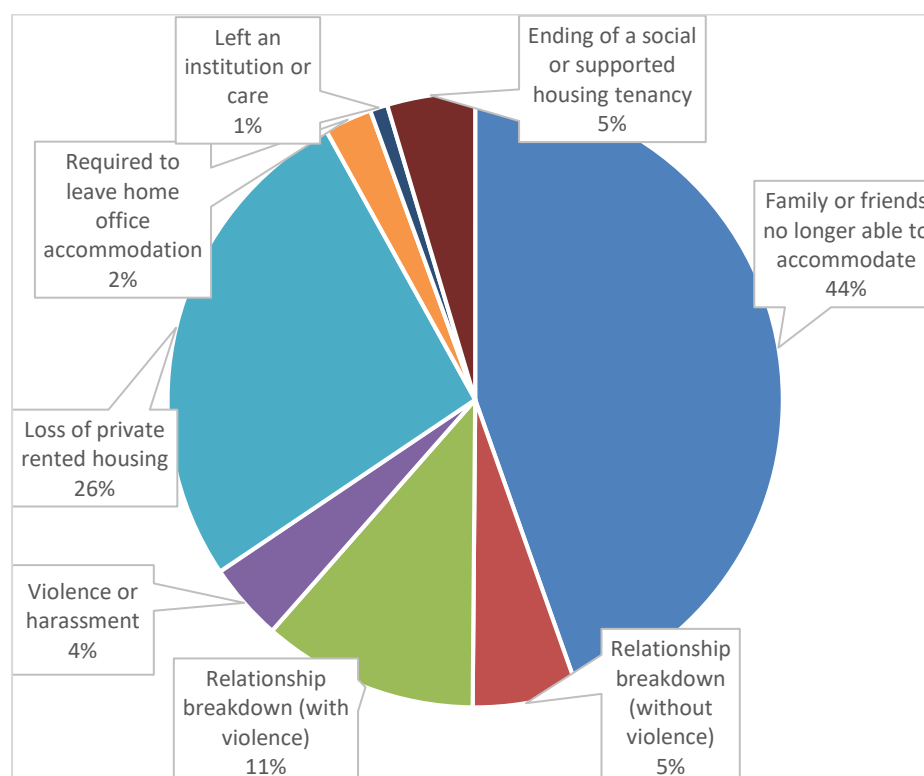
Figure 7: The main cause of homelessness in Westminster for acceptances 2017/18



Source: PIE statistics

[www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness](http://www.gov.uk/government/statistical-data-sets/live-tables-on-homelessness)

*Figure 8: The main cause of homelessness in Westminster for applications 2018/19*



Source: Council records

### 8.3 ***Friends or relatives unable to accommodate***

People and households being accepted as homeless due to exclusion by family, often parents, and friends continues to be the leading cause of homelessness. Often these are 'households within households' that have been living in social sector housing and have been asked to leave due to overcrowding and associated family tensions. They also often include a pregnant woman. The lack of housing options which are affordable locally also plays a role in this form of homelessness.

8.4 Generally, more could be done to understand this cause of homelessness, such as the length of time a person was living with the friend or relative before they were excluded, their tenure and the reason why they were asked to leave.

### 8.5 ***The loss of private rented tenancies***

While the loss of a private tenancy has always been a cause of homelessness in Westminster it increased with welfare reforms which started in 2012. In 2009/10 it was the reason behind 12% of acceptances and this rose to 22% in 2017/18. As highlighted in Section 4, Westminster has the largest private rented sector in England. High levels of population churn are characteristic of the tenure, as tenancies can be ended with two months' notice after an initial period and as landlords are entering and leaving the sector all the time.

- 8.6 However, welfare reform has played a significant role in increasing homelessness due to the loss of a private tenancy. The main welfare reforms were:
- The capping of Local Housing Allowance (LHA) rates from 2012
  - An overall benefit cap for non-working households from 2013, which reduced to £23k in 2016/2017 for couples and families and to £15.4k for single people
  - The freezing of LHA rates for four years from April 2016
  - The restriction of LHA for single people under 35 to the room rate (i.e. in a shared flat or house) from 2012.
- 8.7 The gap between private rents and benefit levels is significant as table 15 shows and the majority of Westminster LHA rates are affected by the Central London capped rate.

*Table 15: The relationship between private rents in Westminster and benefit rates (shown per week and per year)*

	Bedrooms				
	Shared	1 bedroom	2 bedroom	3 bedroom	4 bedroom
Westminster rents per week (30th percentile*)	£160	£375	£525	£724	£924
Central London LHA rate (capped) per week	£144.84	£286.46	£311.40	£365.09	£429.53
<b>Gap per week</b>	<b>£15.16</b>	<b>£106.54</b>	<b>£213.60</b>	<b>£358.91</b>	<b>£494.47</b>
Westminster rents per year (30th percentile)	£8,320	£19,500	£27,300	£37,648	£48,048
Central London LHA rate (capped) per year	£7,531.68	£13,959.92	£16,192.80	£18,984.68	£22,335.56
<b>Gap per year</b>	<b>£788.32</b>	<b>£5,540.08</b>	<b>£11,107.20</b>	<b>£18,663.32</b>	<b>£25,712.44</b>
Overall benefit cap rates	Singles: £296.35 per week, £15,410 per year Couples/households with children: £442.31 per week, £23,000 per year				

Source: Rents data is from Hometrack March 2019, except for the shared room rent, which is a lower quartile rent from Valuation Office Agency data. \*30<sup>th</sup> percentile means the bottom third of rents. LHA rates are for March 2019 from the Valuation Office Agency

#### 8.8 **Relationship breakdown**

This form of homelessness is complex, and the least is known about its causes, and/or the circumstances when it is appropriate for the council to intervene to help prevent it. Clearly this is an area which could be further explored and there may be opportunities when a couple is identified to be having problems by other services.

#### 8.9 **Other/wider causes of homelessness**

Data collection on the cause of homelessness focuses on the reason for the loss of the last settled home, but this can mask the complex interplay of reasons which

contributed to someone becoming homeless which can develop over a number of years.

8.10 In 2016 the council was awarded funding from Government to run a Trailblazer Early Intervention Service which includes research into homelessness and a team of officers, often based out in the community, to work with people at risk of it, at an early stage (before the 56 days required by the law). Research for this project is giving insights into the triggers that can lead to homelessness. Analysis of the 220 households worked with since the project started shows a number of trends arising which could lead to homelessness:

- Continuing problems of affordability in the private rented sector and when problems occur for people on low incomes, arrears build up quickly
- There are some serious disrepair issues in the private rented sector which are impacting on health and wellbeing and associated with this is anxiety about complaining, for fear of eviction
- Some working households are struggling to make ends meet – so, on its own, part time or low paid work is not enough to protect against homelessness.

## Section 9: Preventing homelessness

### Key findings:

The Housing Solutions Service was restructured to respond to the HRA 2017 and it now brings together a range of expertise in homelessness prevention. A range of wider services across the council also contribute to preventing homelessness. The Housing Solutions Service does much to prevent homelessness but there are opportunities for it to be more proactive in the community to explain the support available, identify those at risk and to have a different relationship with the community, so they too have a role in homelessness prevention. There is also a need to better understand and work proactively to address the top causes of homelessness in Westminster (family and friends being unable to accommodate, loss of private rented tenancies and relationship breakdown), through joint work with landlords and letting agents and Children's Services.

### 9.1 The Housing Solutions Service

In 2017, the council retendered its frontline homelessness service (the Housing Solutions Service), in order to respond to the Homelessness Reduction Act (HRA) 2017, and to change the delivery model of the service. The contract was awarded to Places for People and is delivered by its subsidiary, Residential Management Group (RMG). They deliver the service through the Housing Solutions Partnership, which brings experience from the statutory and voluntary sectors together. It is made up of three partners:

- Shelter
- The Passage
- RMG.

### 9.2 The partnership brings together expertise from Shelter in housing advice and community engagement, single homelessness and person centred working from the Passage and statutory decision making (from RMG), and puts greater emphasis on:

- High quality frontline advice that can respond to the issues leading to homelessness such as family breakdown and debt
- Early intervention and homelessness prevention (Shelter give advice and assist people threatened with homelessness before 56 days)
- Increasing resilience in communities by providing clear information and communications about our policies and options for households. A clear link to employment advice/support is embedded in the service
- Co-location of services i.e. in Family Hubs, libraries and GP surgeries, to enable conversations to start earlier and to enable partners to be better informed of how housing can work in partnership to resolve issues sooner
- Greater mobile working, connectivity with other core frontline services and improved digital advice and delivery solutions to better integrate advice services offered by the council to ensure early intervention and/or support is provided where possible

- A distinction between the 'people' and 'property' services to attract specialist providers in each field
- The different requirements of families and single people
- Using best practice from the rough sleeping sector
- Strengthening procurement capabilities to increase supply of affordable accommodation
- Managing and utilising temporary accommodation.

9.3 Preventing people and households from becoming homeless (when they approach the service and are threatened with homelessness within 56 days) is core to the work of the Housing Solutions Service and the service also works with some people at an earlier point. Work to prevent homelessness includes:

- **Developing Personal Housing Plans with people threatened with homelessness** (within 56 days). 966 plans were completed during 2018/19. These set out the actions both the council and the person/household will take to help prevent their homelessness. They might involve looking for alternative private rented housing in a cheaper area.
- **Mediation** to help people remain at home, when they have been asked to leave by family or friends, working towards them moving in a planned way if it is not possible for them to stay in the property in the longer term.
- **Preventing homelessness from the private rented sector.** This can involve working with landlords to help people remain in their homes if they have been asked to leave. Work includes:
  - Negotiating repayment agreements if there are rent arrears
  - Advising tenants about discretionary housing payments (see below) to meet the gap in their rent if they are affected by welfare reform for example
  - Negotiating more time for the tenant to stay, while alternative private rented housing is looked for
  - Offering Disabled Facilities Grants if the property has become unsuitable.
- **Offering private rented housing** with deposits and incentives to landlords in some cases to households that the council is likely to have a main rehousing duty towards. During 2018/19 238 successful offers were made and the majority (93%) of these were in London (see table 16).
- **Intervention by the council's Tenancy Relations Team** if tenants are threatened with eviction unlawfully or have other issues with their tenancy (see table 17). Typically, the council prosecutes around two landlords a year for unlawful eviction.

Table 16: Homeless preventions through the offer of private rented housing

	Westminster	London	Outside London	Total
No	76	146	16	<b>238</b>
%	32%	61%	7%	

Table 17: Tenancy Relations Service activity to help prevent homelessness 2018/19

2018/19	No	%
Deposits	4	2%
Disrepair	49	21%
Harassment	25	10%
Illegal occupation	8	3%
Leasehold query	4	2%
Tenant/landlord dispute	30	13%
Possession proceedings	58	24%
Rent levels	12	5%
Tenancy ending	36	15%
Other	18	7%
<b>Total</b>	<b>244</b>	

#### 9.4 Repeat homelessness

To estimate levels, a sample review of 10% cases (103 in total) during 2018/19 was undertaken and no incidences were identified. A key performance indicator is set annually in this area, which is currently that there should be no more than 5% of repeat applications when advice has been given previously within last 6 months.

#### 9.5 The Early Intervention Trailblazer Service

In 2016 the council was awarded funding from Government to run an Early Intervention Trailblazer Service until March 2019. The council is funding this Service itself until March 2020. The project includes research into homelessness and a team of officers, often based out in the community, to work with people at risk of homelessness, at an early stage (before the 56 days required by the law).

9.6 These people and households include those who are not traditionally identified as being at risk of homelessness – the aim is to work with them ‘upstream’ to address issues that could lead to homelessness.

9.7 The team deliver four outreach sessions weekly in the most deprived communities in Westminster. While they primarily support those in the private rented sector they also signpost other residents to services where they can access support and they work in partnership with specialist agencies to sustain tenancies and prevent homelessness.

9.8 Since March 2018 the team has worked with 220 households and 99% of these have not gone on to make a homelessness application. Research carried out for the

project gives further valuable insight and has shown that knowledge of the Housing Solutions Services is not widespread amongst some people and communities and that sometimes people can feel a sense of shame about their situation, which may result in them not approaching council services at an early stage.

- 9.9 Also, research with a small number of people using the Housing Solutions Service shows that there is sometimes mistrust of it and it is not well understood. People can sometimes feel that they are not listened to which leads to frustration as their expectations are not met. A 'review' of decisions made is often requested, for example during 2018/19 there was a review request about the suitability of 11% of temporary accommodation offers and this rose to around 23% when these offers were outside Westminster.
- 9.10 The research also indicated that sometimes people can feel it is wholly the council's responsibility to prevent their homelessness and that they can be offered a new social home quickly and are not aware of the shortages in supply. The research further found that certain well-connected members of the community, community groups and religious establishments were trusted by people, and are well-placed to play a role in homelessness prevention. A mapping exercise completed as part of this Review has identified nearly 400 organisations across Westminster that the council could work with, including law firms, community organisations, faith and youth groups.
- 9.11 Further research for this project involved a small survey of 28 lettings agencies operating in Westminster (although they were not operating exclusively at the lower end of the market). This found that 64% did not accept households in receipt of housing benefit and their reasons included: the Local Housing Allowance cap; landlord preference; and having to wait for benefit payments as reasons why. None of the agencies were aware of the Housing Solutions Service and only one quarter were likely to sign post any struggling tenants to support services. Clearly this indicates there is scope to work with landlords and lettings agents to help prevent homelessness.
- 9.12 **Other council services, activities and policies that help to prevent homelessness**
- 9.13 ***'City for All' and developing new affordable housing supply***  
The council aims for Westminster to be a 'City for All' where people have access to high quality affordable homes. To achieve this an ambitious target to deliver 1,850 new affordable homes by 2023, has been set<sup>28</sup>. To put this target in context, it will result in three times more affordable homes being delivered than has been achieved over the six-year period 2011/12 to 2016/17. Work to help meet this target includes:

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<sup>28</sup> [www.westminster.gov.uk/city-for-all](http://www.westminster.gov.uk/city-for-all)



- **The estate renewal programme:** which involves regenerating the Church Street area and the Ebury Bridge and Tollgate Gardens Estates. Together these projects will deliver new additional affordable homes and improve current homes.
- **An infill programme:** using vacant or underused land on estates to develop new affordable homes
- **Working in partnership with registered providers and others** to develop new affordable homes and to develop innovative responses
- **Developing the right policies and practices,** the council is updating its 20-year planning policy (the City Plan 2019 - 2040) and the current draft City Plan<sup>29</sup> includes a requirement for a higher proportion (35%) of new housing to be affordable, which is 10% higher than the current target. It also includes an annual target for 1,493 homes of all tenures to be delivered in Westminster which is nearly 40% higher than the current target. In advance of the new City Plan being adopted, an interim statement on affordable housing was published emphasising the need for affordable housing to be delivered in new developments<sup>30</sup>

#### 9.14 ***Addressing poor quality private rented housing***

The Housing Solutions Service works closely with Environmental Health Officers across area teams in Public Protection & Licensing who respond and take action in relation to poor conditions in the private rented sector. This helps private tenants to remain in their homes and helps to prevent a retaliatory eviction if they complain about poor conditions to their landlord. Typically, these area teams respond to around 1,600 queries about private rented conditions annually and work towards ensuring private rented homes are fit to be occupied through a range of measures (see table 18).

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<sup>29</sup> [www.westminster.gov.uk/sites/default/files/city\\_plan\\_online.pdf](http://www.westminster.gov.uk/sites/default/files/city_plan_online.pdf)

<sup>30</sup> [www.westminster.gov.uk/sites/default/files/statement\\_on\\_affordable\\_housing\\_policies.pdf](http://www.westminster.gov.uk/sites/default/files/statement_on_affordable_housing_policies.pdf)

Table 18: Activity by Environmental Health to address poor conditions in the private rented sector 2018/19

Enquiries dealt with about poor conditions	Homes made decent	Category 1 hazards removed (these are serious hazards in the property which may impact on health and safety)	Category 1 fire hazard removed	Houses in Multiple Occupation improved	Enforcement notices served	Prosecutions
1,663	389	436	247	54	319	3

9.15 The council has made tackling poor quality private rented properties a priority as set out in its 'City for All' 'Excellent local services' commitment 2018-19<sup>31</sup>. A housing standards taskforce has been set up to gather and share intelligence on problematic private landlords and to ensure coordinated action against the worst landlords. Scoping is underway on whether there is a case for a discretionary licensing scheme in Westminster. Currently only certain houses in multiple occupation are captured by the statutory scheme, but councils can implement discretionary schemes if there is a case for them. A discretionary scheme could help to improve conditions in the sector as landlords would be required to ensure they met a minimum standard.

9.16 Officers also intervene if there is the possibility of retaliatory eviction through a tenant complaining of poor housing conditions to their landlord and are publicising the Fitness for Human Habitation Act 2018 in their communications to tenants.

9.17 The bulk of the service's work is currently responding to complaints about poor conditions, but it is working towards taking a more targeted approach. A focus group held in 2018 with residents, mostly from migrant communities, highlighted that some groups were unaware of this council service and what it could offer.

#### 9.18 **Children's Services**

The range of services provided are aimed at improving the lives and life chances of children and young people so play a role in preventing children and young people from becoming homeless in the future when they make the transition into adulthood. The targeted **early help programme** aims to assist children and families at an early stage and includes:

<sup>31</sup> [www.westminster.gov.uk/city-for-all](http://www.westminster.gov.uk/city-for-all)

- **Family Hubs** where integrated advice and support services are provided from one location such as Health Visitors and Early Help Social Workers. Currently there is one Hub and there are plans to develop two more by 2022 (converting the current Children's Centres into Hubs). Shelter provides housing advice from the Hub and families using the service frequently have housing issues.
- **Non Violent Resistance (NVR) parent groups.** These are being offered to parents with children between the ages of 10-18 years, whose children present with challenging, destructive or violent behaviours. The programme offers parents and carers a series of alternative strategies for managing the relationship with their child, in a safe and supportive environment. Group participants are encouraged to build a support network around the family as they regain their 'parental presence', address challenging behaviours and learn to avoid escalation. NVR utilises a 'connection before correction' approach which promotes the importance of supportive, open communication between parent and child to avoid familial relationship breakdown and the escalation of safeguarding concerns.
- **Building Relationships for Stronger Families Programme.** This Department of Work and Pensions funded programme aims to improve children's outcomes by reducing parental conflict as evidence shows that it puts children at higher risk where this conflict is intense and poorly resolved. The programme offers eligible parents access to face to face interventions and runs from April 2019 for two years. As relationship breakdown is a major cause of homelessness, there is potential for the Housing Solutions Service to refer into this programme and for officers to receive associated training.
- **Children's and Housing Early Help Multi Agency Panel.** The Panel includes representatives from a range of services and discusses families with housing problems and agrees an approach.
- **Westminster's new Early Help Strategy 2019 - 22,** launched in June 2019 aims to identify the needs within families early and to provide coordinated support before problems become complex. One of its priorities is to develop an early help workforce that is 'trauma informed'<sup>32</sup> and there is potential for this approach to be extended to the Housing Solutions Service.

9.19 Other services which help to prevent and respond to homelessness include:

- **The Looked After Children and Leaving Care Service.** This service provides bespoke training and development programmes to improve the independent living skills of those that are within the service. These opportunities are delivered internally by the

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<sup>32</sup> Trauma informed working is where the trauma someone has experienced is acknowledged and there is understanding of how it may have affected them

service but also in partnership with foster carers, supported housing providers, floating support and external partners including MyBnk<sup>33</sup> with homelessness prevention at the core of these inputs. For those that are successful in moving into independent living, offers of support from the service and Westminster floating support are available to ensure the chance of future homelessness is significantly reduced.

#### 9.20 ***Adult Social Care and Public Health/services for vulnerable adults***

The range of services and care provided can help in preventing homelessness as they enable adults to remain in their homes and live independently. Key services include:

- **The Community Independence Service**, which helps people after an illness or injury.
- **Arranging for specialist equipment and gadgets** (assistive technology), such as grab rails, bath lifts or reachers for picking things up. Gadgets can include alarm pendants or sensors.
- **Shared lives scheme**, which is when a younger or more able adult lives with an older person, or one with disabilities, as a lodger. Under an agreement, the lodger (the homesharer) either lives for free or pays a reduced rent in return for offering a few hours of their time each week to help the householder with tasks around the house.
- **The Home Improvement Agency**, which offers advice and assistance for vulnerable people with repairs, improvements and adaptations and where works have been recommended by an occupational therapist.
- **Grants** – a range are available such as Decent Homes grants and grants to enable homes to be fitted with aids and adaptations.

#### 9.21 ***Employment support (the Westminster Employment Service)***

There is a range of provision which is tailored to meet the needs of different groups (see table 19). During 2018/19 the Westminster Employment Service worked with 749 people and helped 296 into work.

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<sup>33</sup> Mybank is a London based charity who work with children and young people to equip them with the skills to handle their own finances and prepare them for independent living

*Table 19: An overview of the Westminster Employment Service (WES)*

	Type of service
Care leavers	Employment and housing coaching service, including help with tenancy sustainment
Church Street	Employment service to residents living in the Church Street regeneration area. It is provided from the local Regeneration Base
Families and Communities Employment Service	Supports parents into employment. Referral routes include Children's Services, the Integrated Gangs Unit and parents studying at Westminster Adult Education
Homelessness, Employment and Learning Project	Targets residents at risk of homelessness from all tenures, including those with no fixed address
High Potential	Works with long-term unemployed residents who have been out of work for at least two years
Westminster Employment	Supports people with a learning disability and complex/behavioural needs and people with physical disabilities. It is part of Adult Social Care Services
WES for All	Works with any other resident that does fit into the criteria above

#### 9.22 **Commissioning independent advice**

The council funds the Westminster Advice Services Partnership for Westminster residents. It is a consortium made up of Citizens Advice Westminster, Age UK Westminster and the Migrants Resource Centre. They provide advice on:

- Debt and money
- Benefits
- Employment
- Consumer issues
- Housing and homelessness
- Immigration and nationality
- Health and community care.

9.23 During 2018/19 the Partnership gave advice to over 1,000 people with a homelessness related issue. Thirty per cent of these were threatened with homelessness.

#### 9.24 **Preventing homelessness amongst council tenants**

There are few homeless acceptances amongst council tenants. The housing management service has a range of policies aimed at preventing tenants from being evicted including intervention and support when anti-social behaviour or domestic violence occurs and the Income Team works with Shelter and the Children's and Housing Early Help multi agency panel to discuss and develop a homelessness prevention plan for households at risk of losing their council tenancy.

9.25 Where there is a breakdown of a joint tenancy the tenants are both advised to take independent legal advice, or have the tenancy transferred as part of any divorce

proceedings. The focus of activity is on preventing tenants from becoming homeless, when as Section 8 shows, exclusions from 'households within households' from this sector are a major cause of homelessness.

**9.26 *Prioritising homeless households and those at risk of homelessness for intermediate housing***

One of the council's aims is to increase intermediate housing in Westminster so there are more opportunities for households with middle incomes who aren't eligible for social housing and this aim is set out in the council's Housing Strategy: Direction of Travel Statement 2015 and the draft City Plan 2019 - 2040.

**9.27** Applicants register with Homeownership Westminster, the council's intermediate housing service<sup>34</sup>. Sons and daughters of council tenants that are living in overcrowded conditions have high priority for intermediate housing, as Section 7 has identified they are at particular risk of being made homeless. However, a small number (only 19 at April 2019) are registered with the service.

**9.28 *Responding to welfare reform***

The council has a dedicated council wide group, which includes attendees from Housing, the Employment Team and Adult Social Care and Children's Services to ensure its response is coordinated and which works closely with the Department of Work and Pensions. The group for example coordinated and distributed a leaflet about Universal Credit to coincide with its introduction for new customers in Westminster, explaining the support services available and arranged training courses on Universal Credit for staff. It also tracks those affected by other welfare reforms.

**9.29** There is also an operational group which tracks council tenants affected by welfare reform and which works to support them, by signposting to a range of local services to ensure they are not financially or digitally excluded and offering expert debt advice and money management support through a contract with Westminster Citizens Advice.

**9.30 *Offering Discretionary Housing Payment (DHP)***

DHP can bridge any gap between rent and benefit levels. The council has 'topped up' the annual allocation from Government for DHP and claims are agreed in line with the DHP Policy<sup>35</sup>, which focuses on offering DHP for a temporary period, to give people a chance to find alternative accommodation they can afford, for example, or to find work. During 2018/19 there were 625 successful DHP applications.

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<sup>34</sup> [www.homeownershipwestminster.co.uk](http://www.homeownershipwestminster.co.uk)

<sup>35</sup> [www.westminster.gov.uk/discretionary-housing-payment-dhp](http://www.westminster.gov.uk/discretionary-housing-payment-dhp)

Table 20: Allocation and spend on Discretionary Housing Payment

	2016/17	2017/18	2018/19	2019/20
DHP allocation from Government	£2.67m	£1.405m	£1.15m	£1.07
Council contribution	£0	£515k	£260k	To be agreed
Spend	£2.67m	£1.92m	£1.40m	

### 9.31 Wider partnership activities that help to prevent homelessness

#### 9.32 *The Health and Wellbeing Board*

As Section 6 has shown homelessness has significant impacts on health and wellbeing, particularly in relation to children and those with mental health issues. The new homelessness strategy therefore clearly needs to be linked to the Health and Wellbeing Strategy<sup>36</sup>. Westminster's Health & Wellbeing Strategy 2017-2022 has four core 'areas of focus', which aim to:

1. Improve outcomes for children and young people
2. Reduce the risk factors for, and improve the management of, long term conditions, such as dementia
3. Improve mental health outcomes through prevention and self-management
4. Create and lead a sustainable and effective local health and care system for Westminster

9.33 Although none of these priorities makes specific reference to homelessness, they are all factors which influence the prevalence of homelessness and are therefore areas of interest for the Homelessness Strategy. Housing is already represented at the joint Westminster and Kensington & Chelsea Health and Wellbeing Board and ideas for the Strategy have been discussed with the Board.

9.34 In order to further focus the work of the Health & Wellbeing Board, the Board selects three key priorities each year. At the time of completing this review, the options for the Board's key priorities during 2019/20 were being considered, and 'homelessness and health' is one option suggested.

#### 9.35 *Adult Social Care and Public Health Oversight Board*

The Board provides a strategic forum in which services working with vulnerable adults can come together to discuss joint activity, integration of services and funding bids etc.

<sup>36</sup> [www.westminster.gov.uk/your-health](http://www.westminster.gov.uk/your-health)

## Section 10: Responding to homelessness: Accommodation

### Key findings:

There are 2,700 households in temporary accommodation and there are ongoing difficulties in procuring it in Westminster, given high costs, and just over 50% is outside the City, although only 3% is outside London. Support is available for those living outside Westminster. Households with the highest needs are prioritised for accommodation in or close to Westminster. There are policies in place and an action plan to ensure there is sufficient temporary accommodation and current estimates indicate a portfolio of 2,400 – 2,900 units is needed until 2020.

Homeless households are offered private rented sector housing as an alternative to long waits for social housing and 82 households were rehoused in this way during 2018/19. Households are prioritised for accommodation in Westminster/adjoining boroughs in line with their needs. There is scope to expand this approach, particularly as social supply will not meet demand, but more needs to be done to offer properties in areas where households are living currently and to communicate the Policy and the reasons behind it. The council is participating in new initiatives to increase the supply of private rented housing for temporary accommodation and private rented offers and needs to be open to other opportunities.

There are nearly 2,000 units of supported housing and a number of priorities have been identified for supported housing including completing a needs analysis of young people.

Homeless households are prioritised for social housing through the council's Allocation Scheme and targets are set annually to estimate the proportion of social housing to be let to each group in need of housing, including homeless households. Initiatives to help free up social housing for those in need include the flexible/fixed term tenancy policy and a cash incentive scheme.

Given the nature of empty properties in Westminster and the legal framework there is little scope for them to be used as housing for homeless households.

### 10.1 *Helping to secure accommodation (the relief duty)*

As set out in Section 2, one of the new duties on local authorities under the Homelessness Reduction Act (HRA) 2017 is to take reasonable steps to help those applying as homeless to secure accommodation. During 2018/19, just over 1,000 households were owed the relief duty.

### 10.2 *Temporary accommodation*

The council has a legal duty to provide temporary housing to households that are owed a main housing duty. As of April 2019, there were 2,740 households in temporary accommodation. There are two types:

- **Stage 1:** emergency accommodation, which can include non self contained accommodation. By law, no household with children can be placed in this form of



accommodation for more than six weeks. To meet this requirement and to reduce the number of moves families have, placements into non-self-contained accommodation are now very rare for families, and where they occur, it is only for short periods.

- **Stage 2:** longer term temporary accommodation which is procured through contracts with private landlords, registered providers, or through the council's own housing stock.

*Table 21: Households in temporary accommodation over time*

(March)	2013	2014	2015	2016	2017	2018	2019
<b>Stage 1: Emergency Accommodation</b>	607	564	435	358	336	373	242
<b>Stage 2: Longer term temporary accommodation</b>	1,638	1,719	1,962	2,065	2,167	2,164	2,498
<b>Total</b>	<b>2,245</b>	<b>2,283</b>	<b>2,397</b>	<b>24,23</b>	<b>2,503</b>	<b>2,537</b>	<b>2,740</b>

### 10.3 *Location of temporary accommodation and support*

Forty six percent of temporary accommodation is in Westminster. The majority of temporary accommodation outside Westminster (51%) is in greater London, mainly in East London and only a small proportion (3%) is outside London. These percentages reflect the difficulty of finding temporary accommodation that is affordable (within benefit levels) to households, and to council within subsidy levels (which is 90% of 2011 LHA levels and has not increased for 8 years so does not reflect market changes). Affordability issues are most pronounced for larger bedroom homes which make up 30% of the stock. Most London boroughs experience similar problems and the market is competitive.

*Table 22: The location of temporary accommodation March 2019*

	No	%
Westminster	1,248	46%
London	1,403	51%
Outside London	89	3%
<b>Total</b>	<b>2,740</b>	

*Table 23: Temporary accommodation by bedroom size March 2019*

Size	No households	%
Studio/1-bed	574	21%
2-bed	1340	49%
3-bed	609	22%
4-bed	191	7%
5-bed	24	1%
6-bed	2	
<b>Total</b>	<b>2,740</b>	

10.4 Once placed in temporary accommodation support is offered to those living outside Westminster and includes a dedicated officer to ensure children have a school place, information on local amenities and services, a floating support service for vulnerable households, a specialist mental health team and drop in surgeries to help people with rent problems and to manage their finances.

10.5 There is a multi-agency monthly partnership meeting made of representatives from Housing, floating support services and Adult and Children's Services to address any concerns regarding households in temporary accommodation.

10.6 ***Policy framework***

In 2017 the council published a new homelessness policy framework which included:

- **An Accommodation Procurement Policy for Homeless Households**, this sets out principles the council will follow when procuring private housing for homeless households and includes an action plan for ensuring there is sufficient temporary accommodation<sup>37</sup>. This action plan is updated annually through the council's Supply and Allocation of Social Housing Report. The 2018/19 report estimates the council needs a portfolio of 2,300 – 2,700 units until 2020 (Note this estimate has been revised upwards in light of current trends to 2,400 – 2,900 units – see 12.13 in Section 12).
- **An Accommodation Placement Policy for Homeless Households**, this sets out how households are prioritised for temporary accommodation in different locations. Households with the highest social, health and welfare needs are prioritised for accommodation in Westminster and adjoining boroughs and in London in line with this Policy<sup>38</sup>.

10.7 The framework reflects the challenges in securing accommodation that is affordable to households on low incomes both in Westminster and across London. The overall strategy remains to increase the supply of good quality accommodation available for households in housing need, maximising the availability of this in Westminster and then across London.

10.8 ***Private rented sector offers***

In response to the long waits experienced by homeless households in temporary accommodation and rising costs to the council of providing temporary accommodation, a Private Rented Sectors Offers Policy<sup>39</sup> was published in 2017. This represented a shift in approach of always offering homeless households social housing. The Accommodation Procurement Policy for Homeless Households, described above, also applies to these properties as does the Accommodation Placement Policy. Together these policies were introduced to:

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<sup>37</sup> [www.westminster.gov.uk/how-we-allocate-housing](http://www.westminster.gov.uk/how-we-allocate-housing)

<sup>38</sup> [www.westminster.gov.uk/how-we-allocate-housing](http://www.westminster.gov.uk/how-we-allocate-housing)

<sup>39</sup> [www.westminster.gov.uk/how-we-allocate-housing](http://www.westminster.gov.uk/how-we-allocate-housing)

- Respond to ongoing high levels of homelessness, due principally to the loss of private rented tenancies. These tenancies are often lost because rent levels are well above Local Housing Allowance rates and because the overall benefit cap has been reduced for non-working households
- The mismatch between the supply of social housing and demand for it, resulting in homeless households having long waits in temporary accommodation often of up to and exceeding 10 years
- The difficulty of procuring enough temporary accommodation for low income households in Westminster and London which was affordable to the council (within subsidy levels) and to homeless households themselves (within benefit levels) in Westminster and London
- Rising projected costs of temporary accommodation

10.9 During 2018/19, 82 private rented offers were successfully made. A one-year review of the Policy was completed between January 2017 – January 2018 and looked at the 75 successful offers made during this period. The majority (95%) of offers were in Westminster or London and overall it was found that homeless households preferred an offer of social housing. It also found that the reasons behind the Policy were difficult to explain (for instance, it being a response to long waits for social housing).

*Table 24: The location of private rented offers January 2017 – January 2018*

<b>Westminster, Or adjoining borough (Band 1)</b>	<b>Greater London (Band 2)</b>	<b>Outside Greater London (Band 3)</b>	<b>Total</b>
<b>18 (24%)</b>	<b>53 (71%)</b>	<b>4 (5%)</b> x3 were in Surrey (Chertsey, Guildford, Staines), x1 in Berkshire (Reading)	<b>75</b>

10.10 Details of the review can be found in the Supply and Allocation of Social Housing Report 2018/19, but in summary it found that:

- There is potential to widen the number of households being made private rented sector offers as a response to homelessness
- More could be done to offer properties in the areas where people are currently living in temporary accommodation as there has been little link between this and the location of the offer. This approach would help families to retain their local connections and to improve customer response
- The experiences of households that had moved successfully could be communicated to others.

### 10.11 *New initiatives*

The council continues to look for innovative ways to increase the supply of private rented housing both for temporary accommodation and as an alternative to prevent homelessness and long stays in temporary accommodation. Developers and agents often make contact with the council about potential properties, but these are very often at rents significantly above LHA levels. However, the council has been successful in participating in new initiatives to increase the supply of affordable housing to households on low incomes and these include:

#### *Capital Letters Scheme*

- Capital Letters is a private company, limited by guarantee, which is owned and managed by a number of London boroughs and it is funded by MHCLG. When established the company will procure private rented properties across London for its members for homeless households. It aims to increase supply for its members and to enable boroughs to work together more effectively. Westminster has joined as a full member meaning it will have access to properties at LHA rates and for households it means good quality properties sourced through a local authority owned company.

#### *Real Lettings Scheme*

- £30m has been invested by the council into this Property Fund which purchases properties for private rented sector offers. The scheme will assist 94 households and also it offers post resettlement support from St Mungo's and longer term tenancies. The properties are all within allowable LHA rates.

### 10.12 *Affordable housing*

Section 9 sets out the activities to increase affordable housing supply. Each year the council estimates the number of new social homes from council and registered providers that may become available to let. As table 25 shows, on average the largest proportion of social lets annually is to homeless households as they are the largest group with priority for social housing. Nearly 4,000 households have priority for social housing and another 3,000 for intermediate housing.

*Table 25: Social housing lets over time*

	2015/16	%	2016/17	%	2017/18	%	Total 3 years	%
Homeless	455	49%	320	45%	296	47%	1071	47%
Transfer	204	22%	193	27%	172	27%	569	25%
Other	277	30%	206	29%	161	26%	644	28%
<b>Total</b>	<b>936</b>		<b>719</b>		<b>629</b>		<b>2,284</b>	

*Table 26: All households registered with priority for social housing April 2019*

Homeless	Transfer	Other	Total
2,207	1,392	362	3,962
56%	35%	9%	

10.13 ***Making best use of existing stock***

Financial incentives are offered to existing council tenants wanting to downsize – ranging from £500 to £12,500 and households are awarded high priority points to move. Despite this only 17 households moved to smaller homes during 2018/19.

10.14 The council has been offering five-year fixed term or flexible tenancies since 2013 and the approach to renewing these is set out in the Tenancy Policy.<sup>40</sup> A core aim of the policy is to make best use of the stock for those in housing need, including homeless households, and at the end of the fixed term, tenancies are reviewed and under occupying tenants may be offered smaller homes. The council encourages registered providers in Westminster to take the same approach as set out in the Tenancy Strategy<sup>5</sup>.

10.15 There are c14,000 social homes in Westminster owned by registered providers and they are encouraged to reinvest locally any receipts from social homes sold in Westminster.

10.16 ***Supported housing***

The council works in partnership with others such as the voluntary sector, Public Health, Adults and Children's Services, the NHS and Probation Services to commission supported housing, which both prevents homelessness and is a response to it, when it is clear the person applying to the council cannot live independently.

10.17 The Care Act 2014 extends the role of councils to provide assistance to people that have care needs and it defines housing as a "health-related service", highlighting the need for integrating care and support provision. The safeguarding and support needs of vulnerable groups are recognised in Westminster's housing services and there are specialist partnership 'pathways' and teams providing proactive interventions and support to customers, whether or not they are owed a full homelessness duty under housing legislation.

10.18 Just under 2,000 units of supported housing are commissioned and there are 'move-on' pathways from these (with the exception of Community Supportive Housing e.g. sheltered housing for older people) which includes move-on to social housing set through annual quotas. Demand for these homes is high and there are generally waiting lists for each type of housing.

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<sup>40</sup> [www.westminster.gov.uk/housing-strategies](http://www.westminster.gov.uk/housing-strategies)

Table 27: Supported housing provision in Westminster and referral routes

Pathway	Units	Referral Routes
<b>Rough Sleeping</b>		
<i>Rough sleeping: Supported accommodation</i>	430	<b>In:</b> Through outreach services and day centres. The Westminster Assessment & Referral Form is completed on CHAIN <sup>41</sup> (for verified rough sleepers). Other referrals to be agreed with the Rough Sleeping Pathway Coordinator <b>Out:</b> Step-down accommodation (semi-independent), Clearing House, Private Rented Sector
<i>Rough sleeping: Emergency shelter spaces</i>	107	<b>In:</b> Referral forms from outreach and day centre partners to relieve or prevent rough sleeping in Westminster
<i>Rough sleeping: Housing First</i>	25	<b>In:</b> Referrals from the street for complex need, entrenched rough sleepers working with Westminster Compass team
<b>Rough Sleeping Total</b>	<b>562</b>	
<i>Mental Health</i>	362	<b>In:</b> Through Westminster Single Homeless Assessment Referral Panel, referrals from Community Mental Health Team and Housing Solutions Service <b>Out:</b> Private rented sector, Community Supportive Housing/Sheltered, Social Housing Quota
<i>Young Adults</i>	136	<b>In:</b> Housing Solutions Service, Children's Services, Homeless day centres, other local authorities <b>Out:</b> Step down accommodation in pathway, private rented sector, social housing
<i>Ex-Offenders</i>	20	<b>In:</b> Housing Solutions submit referral to Pathway Coordinator, probation <b>Out:</b> Private rented sector, other supported accommodation
<i>Women's</i>	80	<b>In:</b> Domestic Violence refuges: National Domestic Violence Helpline, Refuges Online, Women's Aid, Victim Support, Marylebone Project, outreach services, day centres, Housing Solutions Service refer directly through Marylebone Project <b>Out:</b> Private rented sector, other supported accommodation
<i>Older Persons</i>	838	<b>In:</b> Joint Assessment Panel for Older People
<b>Totals</b>	<b>1998</b>	

10.19 A look at current services, following a restructure of the Housing Service, resulted in areas being identified where these 'pathways' could be developed (see below). Underpinning these improvements are the principles that: each pathway maintains an identity and a specialism; the service user gets the highest level of support regardless of the circumstances that led them here; and every commissioning decision made is evidence based, making better use of data, research, learning and partnerships to ensure we continue to be a leader in the field.

<sup>41</sup> Combined Homelessness and Information Network

## 10.20 Areas to be developed:

- **Access to Supported Housing** to ensure that everyone is aware of it and in view of the increasing number of single people who are approaching the Housing Solutions Service. The model needs to ensure that Westminster residents who approach housing services are aware that there is supported housing available and what it entails.
- **Young adults (16 – 25 year olds).** The pathway enables young adults to develop and gain the necessary skills to live independently and it provides a range of accommodation. A service user needs analysis will be completed by Summer 2019 to ensure there is suitable accommodation for different groups:
  - care leavers
  - young people at risk of homelessness
  - unaccompanied asylum-seeking children (UASC)

The aim is also to re-shape the provision by investing in psychological support services and conducting research into effective, trauma informed interventions.

- **Domestic abuse.** In 2018 the council moved from away from tri borough commissioning and procured a standalone service from Refuge, a national leader in the field. Over the next five years we will work with Refuge to strengthen our response - focusing on delivering a support service which puts trauma suffered at the centre of it. Joint work will also continue with the Community Safety Teams, sitting on the Violence Against Women and Girls Board and ensuring that early intervention and prevention are at the heart of the approach. Links between services will also be considered, both across our own housing stock and rough sleeping services. There is also an aim to ensure a voice on a national platform, in order to raise the profile of this under represented area.
- **Older people (sheltered housing from registered providers).** An initial review has identified opportunities to enhance our offer and to ensure that the needs of older people with more complex support needs around mental health and substance misuse are appropriately catered for. This work will take into account the council's own review of its sheltered housing (called Community Supportive Housing).
- **Mental Health.** Mental Health Supported Housing has undergone its largest competitive re-procurement since 2004, allowing an entirely new approach. New contracts for most services began in May 2019 and offer a clustered model of support. High support 24hr 'hubs' will take the highest need people from our Housing Solutions Service, the community and secure psychiatric settings. Skilled providers will provide holistic wrap around support in partnership with community teams and other support providers. People are then supported into 'step down' provision, or into independent living and the aim is to ensure they move as quickly as possible, when ready, to prevent any 'silt up' of the pathway and so ever-increasing demand can be responded to.

There is more work to do in the mental health pathway and during 2019/20 work will focus on re-procuring future contracts and considering an 'assessment centre' to work with high need chaotic single homeless people who may not yet have the diagnosis or support for their mental health. Alongside this, stakeholder mapping will be undertaken to ensure demand is met, particularly for those approaching the council following the HRA 2017.

- **Offending.** Securing safe and appropriate accommodation is part of the rehabilitation process for people in contact with the Criminal Justice System and collaboration between criminal justice and housing agencies is important to support people to turn their lives around. Re-procurement of our (20 bed spaces) offender services will take place during 2019/20 and ensuring staff are trauma informed is central to this.

This will involve working with partners, including the Ministry of Justice, to make sure the funding is appropriate, expectations are set and the service is delivering quality support for those leaving prison in order to reduce re-offending rates. As part of this process, consideration will be given to the needs of younger offenders and others that are currently under-represented in using our service.

- **Rough Sleeping** (see Section 11).

#### 10.21 *Encouraging other forms of housing supply*

##### 10.22 *Short lets*

The Deregulation Act 2015 amended the Greater London Council (General Powers) Act 1973 to allow householders in London to rent out their properties on a short-term basis (up to 90 days a year) without the need for planning permission. Westminster's location makes short letting particularly attractive and this can reduce housing supply for longer term residents.

10.23 Based on evidence from Inside Airbnb, an open source data tool, there are over 8,300 Westminster properties and rooms listed on Airbnb and c79% of these relate to entire properties. The council's planning enforcement team investigates short term lets, where the 90 day limit may have been exceeded and takes legal action where necessary. During 2018/19 493 cases were investigated.

##### 10.24 *Empty properties*

Council Tax records show that there were 476 empty properties at September 2018, which is less than 0.50% of the overall housing stock.



Table 28: Empty properties in Westminster at September 2018 (Council Tax data)

	No Empties (Council tax data)	Empties as a % of stock
Empty homes	476	0.39%
<i>Of which</i>		
Empty less than 2 years	320	0.21%
Empty 2- 5 years	73	0.06%
Empty 5 – 10 years	59	0.05%
Empty over 10 years	24	0.02%
No attracting higher Council Tax levy = 156		

- 10.25 There is no accurate method of identifying the number of long term empty properties as Council Tax statistics are likely to undercount them, given that there is no financial incentive for owners to advise the council when a property is empty. The council addresses long term empty properties through charging the additional Council Tax Premium on those properties that are unfurnished and have been vacant for two years.
- 10.26 Further activity is unlikely to improve housing supply for homeless households, as although councils can enable empty properties to be brought back into use, through implementing an Empty Dwelling Management Order under the Housing Act 2004, and let them to people in housing need, these can only be implemented for properties that have been empty for two years and where they are associated with vandalism or anti-social behaviour. This type of activity is generally not associated with empty properties in Westminster.

## Section 11: Rough sleepers

### Key findings:

The council already has a Rough Sleeping Strategy 2017-22 which it is delivering and despite a recent increase in numbers of rough sleepers it is considered fit for purpose. These increases were largely due to a rise in the number of EEA/non-UK nationals sleeping rough, following the December 2017 High Court ruling which set out that serving removal notices to EEA nationals, who had not made efforts to find work and accommodation, was unlawful. Without a change in the law the council is unable to fully address this increase.

The Rough Sleeping Strategy is monitored and progress against its priorities is reported annually to the Cabinet Member responsible for rough sleeping. A noted achievement is 65% of people new to the streets did not spend a second night out.

- 11.1 Because rough sleeping is the most extreme and dangerous form of homelessness, and as Westminster sees the highest numbers across the country, the council already has a Rough Sleeping Strategy 2017-2022. The Strategy is at:

[www.westminster.gov.uk/sites/default/files/rough\\_sleeping\\_strategy.pdf](http://www.westminster.gov.uk/sites/default/files/rough_sleeping_strategy.pdf)

- 11.2 The council invests significantly into rough sleeping services and in the delivery of our strategy, spending approximately £6.5million a year, working closely with around 50 partners across commissioned and non-commissioned services including:

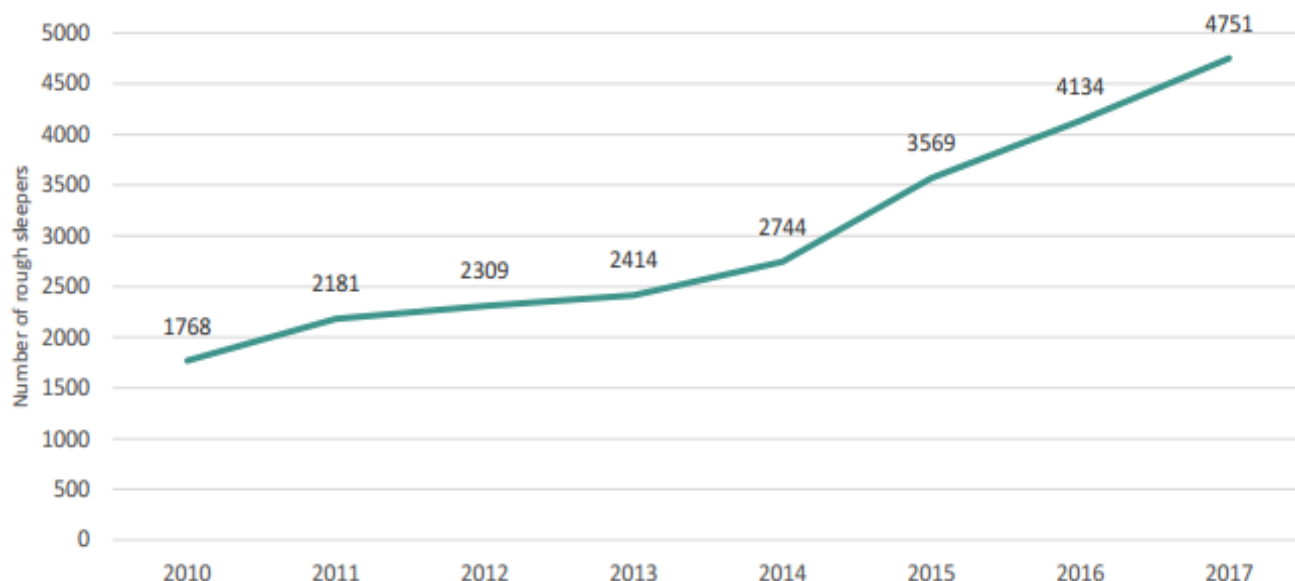
- Look Ahead
- The Passage
- St Mungo's
- Housing Justice
- Connection at St Martin's
- Single Homeless Project
- West London Mission
- Mayday Trust.

- 11.3 **Issues the Rough Sleeping Strategy is addressing**

- 11.4 ***High/increasing levels of rough sleeping***

Nationally rough sleeping is increasing. The number of people sleeping rough in England has increased every year since 2010 from 1,768 on any one night in 2010 to 4,751 on any one night in 2017, representing a 169% rise in the last 7 years.

Figure 9: Rough Sleeping in England 2010-2017



- 11.5 In London, 8,855 rough sleepers were seen in 2018/19, and Westminster accounted for 30% of this total. Westminster consistently accounts for the highest number of rough sleepers seen in London and across the UK. In 2018/19 we saw 2,512 rough sleepers, which is more than the next highest 4 boroughs combined<sup>42</sup>.

Table 29: Rough sleepers in Westminster and neighbouring boroughs 2018/19

London Borough	Number of Rough Sleepers seen in 2018/19
Westminster	2,512
Camden	815
Newham	612
City of London	441
Southwark	435

- 11.6 In 2018/19 we have seen a 16% increase in rough sleepers when compared to the previous year, and this is attributable to the increase in the number of new rough sleepers to our streets.

<sup>42</sup> The Combined Homelessness and Information Network (CHAIN) collates all the information about people seen rough sleeping in London by outreach teams each year. CHAIN is commissioned and funded by the Greater London Authority (GLA) and managed by St Mungo's.

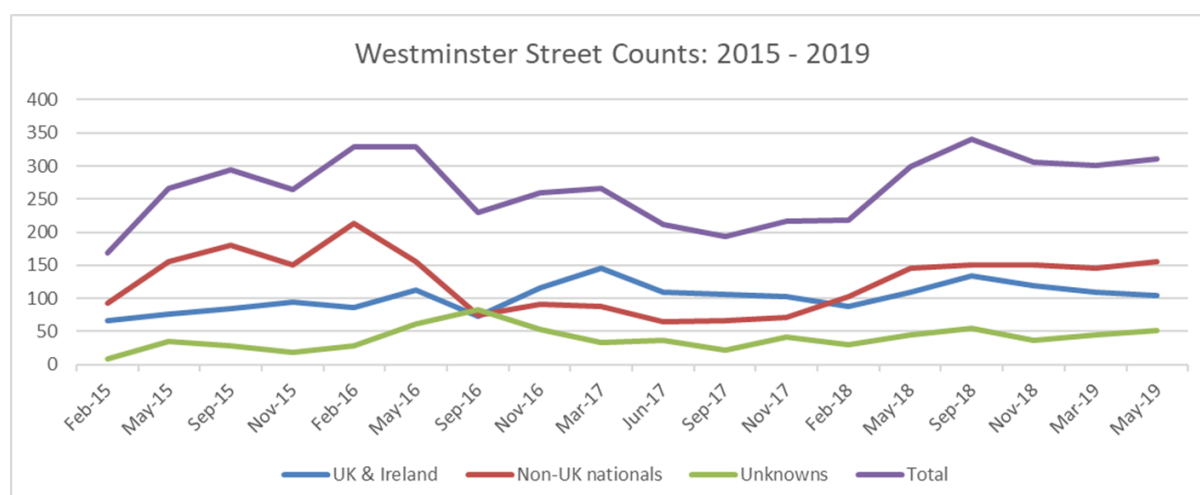
Figure 10: Rough sleepers in Westminster 2015/16 - 2018/19



Category	Description
New	People who had never been seen rough sleeping before (i.e. new rough sleepers)
Stock	People who have been seen rough sleeping over a minimum of two consecutive years and are more likely to be entrenched rough sleepers
Returner	Habitual rough sleepers who may disappear for long periods but periodically return to sleep in Westminster

- 11.7 This significant increase is largely linked to a rise in new EEA/non-UK nationals sleeping rough, following the December 2017 High Court ruling which set out that activity to serve removal notices to EEA nationals who had not made efforts to find work and accommodation was unlawful.
- 11.8 In 2018/19 UK Nationals made up 450 of the 1,492 new people on the streets, with 660 new people coming from EEA countries and 79 from outside the EU. For the remaining 303, a nationality could not be identified although the majority are thought to be from outside the UK.
- 11.9 Similarly the 2019 street count found that less than a third of the 310 rough sleepers were UK nationals.

Figure 11: UK and Foreign National rough sleepers in Westminster from 2015-2019



11.10 'Stock' numbers of rough sleepers (see the key above) have however been consistently decreasing over the past three years, reversing the trend seen across London. In addition, 85% of new rough sleepers only spend one or two nights out. This is attributable to the commissioned outreach and accommodation services which stem the high flow of rough sleepers to central London, whilst also working with the more entrenched rough sleepers.

#### 11.11 **Westminster as a popular destination to rough sleep**

Data on local connection and 'last settled base' is limited for rough sleepers, but where it exists, it indicates that less than 3% identified Westminster as a place where they last had a home or were settled. Westminster attracts a disproportionate number of rough sleepers from across the UK and internationally due to:

- Its central location providing transport and accessibility
- Its begging opportunities (with the ability to raise c.£200 a day)
- A flow of easily accessible drugs
- Its safety and employment opportunities
- Its commissioned services and also due to non-commissioned services such as soup runs and those offering informal 'advice'.

#### 11.12 **Causes of rough sleeping**

The causes of rough sleeping are complex and interconnected, with many factors often combining to create a 'perfect storm' which results in someone sleeping on Westminster's streets. Although each case is unique, the following factors contribute:

- **Complex personal situations and support needs:** This includes relationship breakdown, no longer being able to afford housing, substance misuse and mental or physical health issues. Some people have had sudden changes to their lives, traumatic experiences or need to leave unstable environments.

- **Autonomy, pride and self-sufficiency:** Some people may not have complex support needs but do not access accommodation and support for other reasons. For example, some say they are happy living on the streets and that it is their choice. They can express pride at their self-sufficiency and ability to survive and of the community they are part of. Others decide they want to live outside the 'system' including hostels, the 'homelessness industry' and benefits. These views are often interlaced with complex mental ill health and they can result in support not being accepted.
- **Immigration Status:** Some people have no recourse to public funds (NRPF), which prevents them accessing statutory support or welfare. Many non-UK rough sleepers also refuse offers of support away from the streets as they are sleeping rough in London temporarily while seeking (frequently informal) work.

#### 11.13 ***Rough sleepers with complex needs***

There are currently c.120 long term, complex, hard to reach rough sleepers who have refused, or find it difficult, to engage with services. Their lifestyles can be chaotic and they have high-level support needs, including issues of mental health, substance misuse and involvement in anti-social/criminal activity.

#### 11.14 ***Rough Sleeping Deaths***

Deaths have been increasing since 2016, and between June 2017 and August 2018 the deaths of 33 rough sleepers were recorded (in Westminster supported accommodation, in hospitals or on the streets). Some of the causes of these deaths were:

- Sudden substance misuse
- Existing physical health/natural end of life situations
- Suicide
- Road traffic accident (after the individual stepped out of his tent pitched on a central reservation).

#### 11.15 ***Barriers to interventions***

Challenges that make it harder to prevent rough sleepers or to support them include:

- **Access to support for EEA nationals:** Under DWP regulations we are unable to provide this group with welfare support as they have no recourse to public funds, nor are we able to work with the Home Office to impose their removal. Without accessible support provision or enforcement powers, these people, who insist they do not want to return home, leave themselves with no choice but to remain on our streets placing them at high risk of developing complex and longer term problems and entrenchment.

- **Access to substance misuse services:** Currently rough sleeping services are delivered locally which means substance misuse services are only available to those who have been resident in Westminster. As most rough sleepers do not have a residency connection to Westminster it is a challenge to assist them if they are unwilling to return to the area where they have a connection. This can lead to longer term entrenchment.
- **SPICE:** The highly addictive psychoactive substance, is an illegal class B drug which induces an inactive state and in recent years has become commonly used among the rough sleeping population.
- **Tents:** The current number of people residing in tents on any one day/night in the City is c.25 and this number increases in the winter months and after festivals when large numbers of used tents are donated. Whilst the public perception is that tents appear to provide a safer place to sleep, our experience is that they present a significant risk of harm to the safety of the person using them as:
  - They are a barrier to outreach workers providing support services as the rough sleeper can't be seen
  - They are focal points for anti-social behaviour
  - They are a risk to the wider community as they block accessibility to public highways and spaces and encourage the build-up of waste, which attracts pests and raises public health concerns
  - They can be used as a place to harbour weapons
  - They can be used as private spaces for drugs, alcohol and sexual activity.
- **Public Goodwill:** Despite the intended goodwill of the public and charities, acts of kindness (including giving donations to rough sleepers who beg, food provided by soup runs, and sleeping bag/tent handouts) fail to help the most vulnerable. This is because they do not do enough to engage rough sleepers with services that can help them away from the street, and rather make it easier for a rough sleeper to sustain their lifestyle – further driving entrenchment.

## 11.16 The Rough Sleeping Strategy 2017-2022

- 11.17 The Strategy was published in January 2017 following an eight-week public consultation between September and November 2017, with responses from the general public, local businesses and partners. Consultees were informed about the Strategy by letter and email. Responses could be made in different ways, including: a dedicated questionnaire; at dedicated meetings; via 'Pop up' meetings; and at existing partnership meetings where it was discussed (such as the West End Partnership, Safer Westminster Partnership, Westminster Provider Network and Business Improvement District).

- 11.18 Businesses in rough sleeping 'hot spots' were visited and direct feedback was received. The Strategy was also discussed at the Housing, Finance and Corporate Services Policy and Scrutiny Committee. A tailored approach was taken to consulting with service users which was developed with support workers.
- 11.19 Overall, 417 people / organisations were engaged with and 136 responses to the questionnaire were received. Responses were broadly positive and 92% of them agreed that the three priorities were the right ones.
- 11.20 The final Strategy responded to issues raised during the consultation, for example its timeframe was lengthened from 3 to 5 years because respondents said it was a long-term problem and required a longer term response. It also set out the council's response to begging and anti-social behaviour more clearly, acknowledging the impact this can have on communities, given concerns raised during the consultation (although the Strategy does make it clear that this isn't necessarily connected with rough sleeping).
- 11.21 **Rough Sleeping Strategy Priorities**  
Given the complex causes of rough sleeping and the attraction of Westminster as a location in which to sleep rough, the Strategy sets out the aim to tackle the root causes of the issue, rather than simply moving it to another part of the City. There are three priorities:

**Priority A: Where it is possible to do so, prevent people from sleeping rough in the first place.**

- 11.22 This priority reflects the fact that the best approach to rough sleeping is a preventative one. This is made more challenging in Westminster by the majority of rough sleepers not having any local connection to the city. Actions from the Strategy include:
- Ongoing collaboration with the Mayor and MHCLG to develop prevention plans, including playing an integral role in the development of the Mayor's 2018 Rough Sleeping Plan of Action.
  - Strengthening partnerships with probation services to ensure that people leaving prison do not end up on the streets.
  - Creating partnerships between the council and Central London Clinical Commissioning Group to enable hostels to provide respite accommodation for rough sleepers.



**Priority B: When people do end up on the streets, provide a rapid response, support people to rebuild their lives and stay off the streets for good**

11.23 This priority recognises that the council will not be able to prevent rough sleeping in all cases, and that for those who do end up sleeping on the streets, it is committed to the Mayor's aim that people who arrive new to London's streets don't spend a second night out. The council's outreach services are on Westminster's streets 365 nights a year and play a vital role in ensuring that the majority of new rough sleepers don't spend a second night out (see 'Rapid Response Rough Sleeping Services' for more information).

11.24 This priority also focuses on providing rough sleepers with a sustainable route away from the street, with each support plan tailored to their circumstances. This means working closely with partner agencies to address the complex challenges faced by rough sleepers, including mental health and substance misuse issues. This also means providing more tailored support for female rough sleepers through spaces which are designed to meet their specific needs.

11.25 Actions from the Strategy include:

- Opening a new in-borough Assessment Centre, to work with rough sleepers who have no local connection to Westminster.
- Embedding a Mental Health professional as part of the regular outreach service, to provide help and support as well as a link with statutory mental health services.
- Developing a Housing First pathway, which focuses on providing rough sleepers with accommodation in the first instance, as a base from which more complex support needs can be assessed and met.
- Opening an emergency night shelter for female rough sleepers, which supports women who may have suffered domestic abuse in a trauma-informed way and draws up detailed action plans for each individual.

11.26 Services which relate to this priority are listed in the next table.

Table 30: Rough sleeping services

Service	Description
	<i>Outreach</i>
<b>Outreach teams</b>	Over 30 outreach workers are commissioned to find, support and manage the rough sleeping population. Teams engage with c. 2500 people annually. They also bring rough sleepers to the No Second Night Out assessment hub (a GLA commissioned service) where they are assisted to exit rough sleeping by a variety of means, including reconnection with their home areas
<b>Rapid Response Services</b>	These aim to stop rough sleepers spending a second night on the streets (to avoid them becoming an entrenched rough sleeper)
	<i>Bedspaces and shelter</i>
<b>Accommodation</b>	415 supported housing bedspaces, including an assessment centre which can sleep up to 40 and a night centre which can support up to 80 people. There are 25 emergency bedspaces available in supported housing for those discharged from prison or hospital or who are so vulnerable that they require an immediate route off the streets
<b>Emergency Shelter via the Severe Weather Emergency Protocol (SWEP)</b>	Emergency shelter is provided for days when temperatures are predicted to fall below zero to help prevent deaths. Up to 100 extra spaces are provided (250 are provided in extreme cases)
	<i>Services for entrenched rough sleepers</i>
<b>Specialist Outreach</b>	9 specialist outreach workers help rough sleepers find sustainable routes off the streets. They provide specialist and integrated services across mental health, substance misuse, the criminal justice system and employment
<b>Housing First</b>	20 units of accommodation. To access it people do not have to prove they are ready for independent housing and are offered it alongside coordinated wrap-around, personalised support
<b>Street Buddy</b>	Rough sleepers are paired up for support with a former service user in a befriending type arrangement to provide peer support and advice to encourage the uptake of services
	<i>Services aimed at the day time street population (which may include rough sleepers)</i>
<b>Integrated Street Engagement Unit</b>	Unit made up of council services, local charities and the police which provides direct and coordinated advice and support during the day to get more people into services and accommodation, and taking enforcement action where appropriate

- 11.27 Other activities which help to meet this objective include:
- 11.28 **Response to deaths.** When there is a reported death the lead agency identified as having the most contact with the individual leads the fact-finding review of the circumstances and interventions prior to the death, and highlights where there may have been missed opportunities or any lessons learnt.
- 11.29 From this report, the case is escalated to Westminster's Enhanced Vulnerability Forum (EVF), which is a multi-agency group (including representation from rough sleeping commissioned services, public protection, health and adult social care) to discuss complex rough sleepers that present with high risk health and mental health concerns that have "fallen through cracks" and/or been very resistant to change. Whilst not everyone who is sleeping rough or living in a hostel for the homeless has care and support needs and is eligible for adult safeguarding, there is considerable overlap. This EVF is used to make the decision about whether a death has fulfilled the criteria for referral into the Safeguarding Adults Case Review Group. An annual report is also developed relating to deaths in order to help identify trends which can help to tailor interventions.
- 11.30 **Addressing substance misuse.** To improve the availability of services the council advocates for a regional or national response to service provision by removing the current 'residency criteria'. In the meantime our focus is to offer harm minimisation advice and, in the highest risk cases, to bring people into supported accommodation to allow them access to structured treatment.

**Priority C: Protecting communities from anti-social behaviour associated with rough sleeping and intervening to stop dangerous behaviour**

- 11.31 This priority focuses on people who have refused to engage with support services and who are posing a danger to themselves or others through anti-social behaviour or crime. The council works in partnership with the Metropolitan Police to tackle on-street crime and anti-social behaviour and aims to use enforcement activity as a tool to encourage rough sleepers to take positive steps towards moving off the streets.
- 11.32 Actions which help to meet this priority include creating the Integrated Street Engagement Unit, which offers comprehensive support for Westminster's daytime street population. This team has had some notable successes, engaging with 540 individuals within its first two quarters of operation. For more details, see the section on 'the day time street population' in table 30.
- 11.33 It should be noted that with regards to tackling tents, both the council and Police have limited powers as neither can enter or remove the tent without lawful cause (right to privacy and respect for personal property as directed by the Human Rights Act 1998). In addition, the court process is slow and the geographical parameters of any removal order granted are site specific. This means once contact has been made with a person using a tent, they move its location (sometimes to just around the

corner). In addition, if the tent is lawfully removed and disposed of, the council and Police do not have powers to prevent a new one being set up on the same site.

#### 11.34 **SPICE**

In January 2017 after three deaths, including one murder, directly related to SPICE, the Police began a successful operation in conjunction with the Local Neighbourhood Team. The operation resulted in the conviction of nine dealers. However, the human costs continue to grow, particularly because there are current difficulties in navigating a treatment pathway. Work is taking place with the Rough Sleeping Team and Public Health to review the effectiveness of the current Synthetic Psychoactive Substance pathway and what research is available, and the availability and levels of support provided to transient drug users with no obvious local connection. However, our position is that the increase in SPICE use and its effect on our service users requires Public Health England to review their guidance on Spice and introduce both treatment and funding to address the growing dependence and market for this drug.

#### 11.35 **Rough Sleeping Strategy Monitoring Process**

The Strategy is reviewed annually and the outcome is reported to the Cabinet Member with responsibility for rough sleeping. The last report was for 2017-18 and it highlights a number of successes against the commitments of the Strategy as well as ongoing challenges.

11.36 Achievements include a 22% reduction in the number of people seen on the streets between 2016-17 and 2017-18 and of the 1,083 people who were new to the streets, 65% did not spend a second night out.

#### 11.37 **Current issues**

The current rise in EEA/non-UK nationals rough sleeping is of particular concern to us. It is not possible to provide traditional support to this group as they are not eligible for housing or welfare support, have little or no support needs, actively refuse to engage with our services, avoid contact with authorities, and do not wish to move away from the streets, or be a part of the wider community.

11.38 However, sleeping on the streets for any amount of time is harmful and dangerous and increases the risk of substance misuse, exploitation and entrenchment. Our approach is therefore to always find an alternative and sustainable pathway away from the street including:

- **Reconnection:** For EEA nationals a one time offer of reconnection support is provided. If they have support needs, the aim is to link them into support services in their home country. For non-UK nationals outside of the EEA, we work in partnership with the Home Office Immigration Enforcement to reconnect them to their home country, where this is appropriate.

- **Specialist outreach support for No Recourse to Public Funds:** For those who have significant support needs or have complex immigration cases, we have access to a GLA funded team called Routes Home. They will work with any Non-UK National who has a demonstrable support need and has accepted that they would like to return home. Routes Home will facilitate this and have access to bed spaces whilst this work happens. The challenge for Westminster is, that whilst we do use it, the majority of people do not meet the criteria.

#### 11.39 **Conclusion**

The Rough Sleeping Strategy 2017 – 22 remains a robust framework to prevent and address rough sleeping. Whilst there has been an increase in cases of rough sleeping in Westminster over the past couple of years, these have largely been driven by the High Court ruling relating to EEA nationals. Though the council continues to do everything in its power to help individuals off the streets, legislative change is required in order to address many of the underlying causes of the increase in instances of rough sleeping.

## Section 12: Looking Ahead and Conclusions

12.1 It is difficult to predict with accuracy future levels of homelessness and the resources needed to address it, given it can be a result of wider structural factors related to the economy and national policy as well as personal ones and also because the long term impact of the Homelessness Reduction Act (HRA) 2017, which was only implemented from April 2018, is hard to estimate.

### 12.2 ***The Homelessness Reduction Act: One year's experience***

During 2018/19, 4,821 people/households approached the Housing Solutions Service, a higher number than in the past and approaches were higher in the final quarter compared with most other months. The associated administrative costs have been high in view of this.

Figure 12: Homelessness approaches

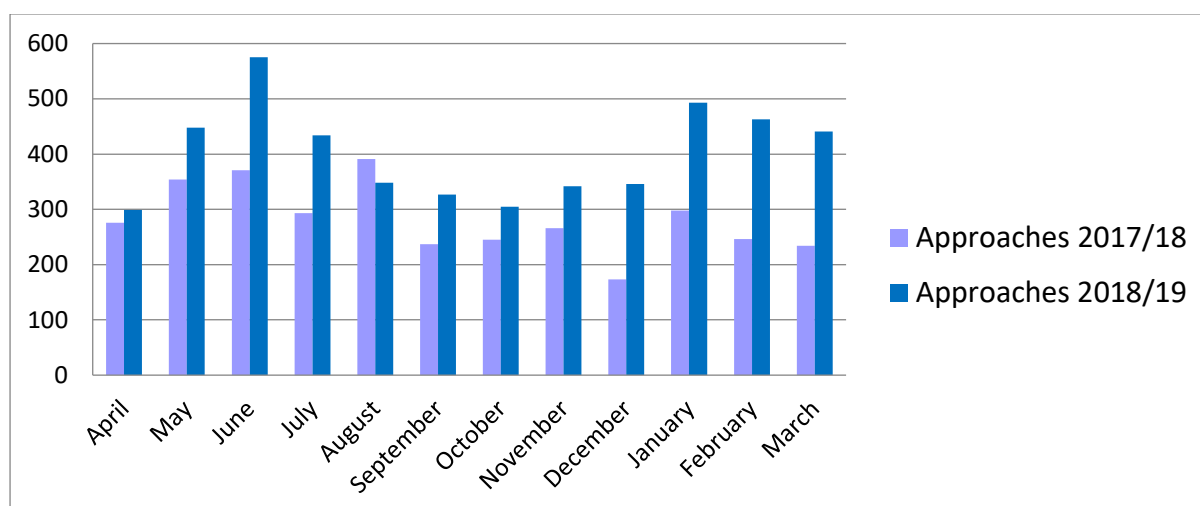


Table 31: Headline homelessness activity 2018/19

Approaches	Applications made	Prevention duty owed	Relief duty owed	Acceptance of main Housing duty
4,821	1,766	381	1,012	214

12.3 During 2018/19 there were 1,766 homeless applications, an increase of over 140% compared with 2017/18, although direct comparisons cannot be made between the two years, as a homeless application is taken at a different point since the HRA 2017.

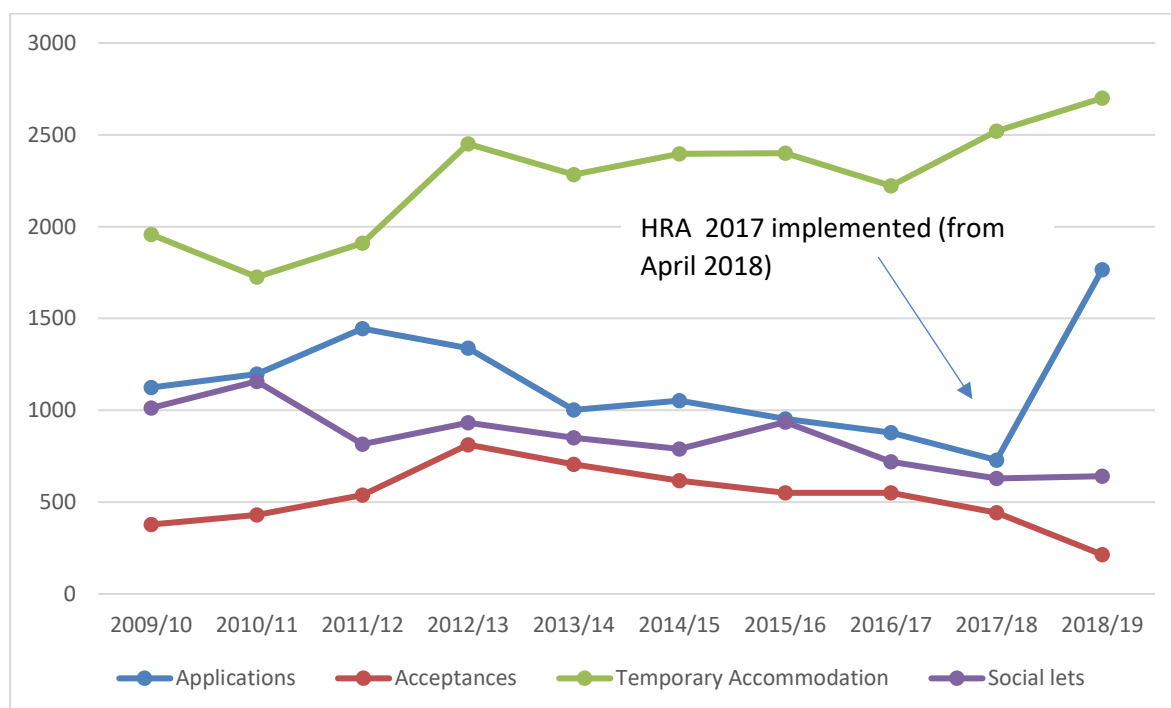
12.4 Greater numbers were owed the 'relief duty' compared to the 'prevention duty' and over 70% of people/households presented at the relief duty stage, when they have no accommodation and when homelessness cannot be prevented. Those

approaching at this stage are both singles and 'households within households' (as described in Section 8) and they often include pregnant women. As table 10 in Section 7 shows more single people generally are now approaching the service.

- 12.5 Temporary accommodation increased during 2018/19 from 2,500 households in March 2018, to 2,700 in March 2019. This is due to the volume of applications and the numbers presenting at the 'relief duty' stage, whilst it is decided if a full housing duty is owed (those offered temporary accommodation by the council are likely to be owed a full housing duty).
- 12.6 Acceptances were lower than in 2017/18, however it is difficult to tell if this will become a trend or is due to the volume of applications during January – March 2019 which are still pending decisions (applications need to be investigated and under the HRA 2017 the main housing duty does not arise until the relief duty has come to an end after 56 days).

### 12.7 ***Affordable housing supply***

*Figure 13: Homelessness and social lets*



- 12.8 Despite the focus on developing new affordable homes described in Section 9, there will not be enough new affordable homes to meet demand from homeless households and others with priority for it. Table 26 in Section 10 shows that demand from all groups for social housing is high and table 4 in Section 6 shows current average waits.

- 12.9 Using the Ministry of Housing, Communities and Local Government's standard method it is estimated in Westminster's Housing Needs Analysis 2019<sup>43</sup> that 1,495 new homes are needed each year and the council proposes this target in its updated draft City Plan 2019 – 40. The Analysis also estimates that 563 (38%) should be affordable (of which 247 social homes are needed and 316 intermediate). It is acknowledged that the proposed target (that 35% of all new homes are affordable) in the draft Plan is below what is needed, but this target is considered realistic and deliverable for Westminster.
- 12.10 Building more affordable homes to meet demand is particularly challenging in central London where land values are high and there is a shortage of land for development. These issues are discussed in the council's draft Housing Strategy 2015 and the Housing Strategy Direction of Travel Statement 2015<sup>44</sup>.
- 12.11 Also, social lets have been reducing over time as figure 13 shows and they are likely to reduce further in the short to medium term as tenants in the housing renewal areas need to move temporarily to enable regeneration to happen. Although housing renewal in the longer term will help to increase affordable housing supply it places short to medium term pressures on supply.
- 12.12 ***Affordability of private rented housing***  
The lack of affordable private rented housing (i.e. within benefit and temporary accommodation subsidy levels) in Westminster is an ongoing problem, which limits the council's ability to respond to homelessness and many households are reluctant to move away from the local area. There is ongoing uncertainty about the transition to Universal Credit.
- 12.13 **Conclusions**  
If these trends continue, and if there is no change in approach, it is estimated:
- That the council will need a portfolio of 2,400 – 2,900 temporary accommodation properties until at least 2020
  - Current levels of investment in homelessness services (see table 5 in Section 6) will need to be retained to manage current levels of activity or an increase in demand.
- 12.14 As Section 3 shows, there are uncertainties around long term national funding for homelessness services within Westminster and potential for funding to be reduced. This review indicates the Homelessness Strategy needs to address:

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<sup>43</sup>

[www.westminster.gov.uk/sites/default/files/city\\_plan\\_revisions\\_-\\_housing\\_needs\\_analysis\\_june\\_2019.pdf](http://www.westminster.gov.uk/sites/default/files/city_plan_revisions_-_housing_needs_analysis_june_2019.pdf),  
[www.westminster.gov.uk/sites/default/files/city\\_plan\\_revisions\\_-\\_housing\\_needs\\_analysis\\_technical\\_appendix\\_june\\_2019.pdf](http://www.westminster.gov.uk/sites/default/files/city_plan_revisions_-_housing_needs_analysis_technical_appendix_june_2019.pdf)

<sup>44</sup> [www.westminster.gov.uk/housing-strategies](http://www.westminster.gov.uk/housing-strategies)



### **Awareness of support available and mistrust of council services**

- Many households still approach the Housing Solutions Service at a stage when their homelessness cannot be prevented and there is a lack of knowledge about the Service amongst some residents and communities. There is also mistrust about it and the decisions that are made
- Awareness raising will require a cultural change and a shift in approach building on work already done. More also needs to be done to explain the service and how decisions are made, points of access, the context in which it operates and to hold it to account
- The learning from the Early Intervention Trailblazer Service research and the mapping exercise of voluntary and community groups provide opportunities to work differently with the community and for them to play a part in homelessness prevention.

### **Early Prevention as a future model**

- The success of the Early Intervention Trailblazer Service shows that early intensive work with people at risk of homelessness results in them not going on to make a homelessness application and ways need to be found to embed this into the mainstream service.

### **Perceptions of what can be offered**

- Research for the Early Intervention Trailblazer Service shows that many believe that the council can offer homeless households a social home quickly and that it is the only response to their homelessness. Despite the council's focus on developing more affordable housing it will never meet demand for it in Westminster.

### **The main causes of homelessness in Westminster**

- A better understanding of people and households that are homeless due to 'family and friends being unwilling to accommodate' is needed, combined with a more proactive approach. Opportunities are presented by the council's provider of housing management services being brought back in house as there is scope to move away from the traditional focus on preventing only the tenant's homelessness. There are also opportunities to involve registered providers in any new approach and to make sons and daughters of council tenants aware of intermediate housing options, particularly as more are developed across Westminster and as local people will be prioritised for it in regeneration areas.
- A better understanding of the council's role in helping to prevent homelessness due to relationship breakdown is needed and projects aimed at reducing parental conflict and as part of the Early Help Strategy present opportunities to work differently
- The affordability of private rented housing in Westminster and London continues to be an issue and the council could use its influence to make the case for the links between benefit levels and private rents to be reviewed. There are also

opportunities to work differently with private landlords and lettings agents, so they are involved in alerting the council when problems in a tenancy occur.

**Private rented sector offers**

- There is scope to expand these as an alternative to spending long periods of time in temporary accommodation, building on knowledge and experience so far and offering more support to help households settle when they are beyond Westminster.

**A whole council approach**

- Much activity around the council helps to prevent homelessness and there are further opportunities. There is potential to link any proactive work in the community to explain homelessness services with raising awareness about what our Environmental Health Officers within area teams can offer for example
- As already stated there are opportunities to better respond to triggers that may lead to relationship breakdown through closer working between Housing and Children's Services.