

Cllr Soraya Adejare, Chair
Cllr Clare Joseph, Vice Chair
Living in Hackney Scrutiny Commission
Sent via email

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30 January 2024

Dear Soraya and Clare,

2024-26 Homelessness & Rough Sleeping Strategy - response to Scrutiny recommendations

In our respective capacities as the Cabinet member and Deputy Cabinet member for Housing Needs & Homelessness we both welcome the conclusions and recommendations of the Living in Hackney Scrutiny Commission regarding the recently adopted 2024-2026 Homelessness & Rough Sleeping Strategy.

As the commission has identified, the strategy comes at a time of unprecedented demand alongside uncertainty and change impacting on housing supply and the Council's roles hampered by a lack of funding, a coherent national policy to tackle homelessness and Government legislation to address the issues that are driving ever higher levels of homelessness. All this is compounded by a chronic lack of coherent Government led policy to meet both the wider housing and health related challenges faced by individuals and families.

We both note and welcome the Commission's recommendations, set out below for reference:

Recommendation 1

The Council lobbies central government to include all accommodation provided under the Homelessness Legislation Act in the Social Housing (Regulation) Bill, and for an update to legislation and the Homelessness Code of Guidance to include minimum basic facilities and adaptations for temporary accommodation.



Recommendation 2

Benefits & Housing Needs ensures that the Council's own temporary accommodation stock in all cases includes minimum basic facilities and adaptations which go beyond those currently set out in legislation and the Homelessness Code of Guidance, such as the provision of WIFI, laundry facilities, adequate space for children to learn and play, safer sleeping equipment and enough bedrooms to accommodate family size.

Recommendation 3

Benefits & Housing Needs explores the options for funding and encouraging the creation of Temporary Accommodation Action Groups (TAAGs) or equivalent bodies in which residents have an active and inclusive role in every locality, so that people living in temporary accommodation don't feel isolated, and can express their views on what needs to change and receive meaningful engagement with these views from providers and statutory agencies.

Recommendation 4

Benefits & Housing Needs undertakes further consultation with LGBTQIA+ organisations, groups and residents (including young LGBTQIA+ residents) to ensure homelessness services meet their needs, and engages those involved to hold the Council to account during the implementation of the strategy.

Having considered the recommendations in detail please find a formal response to the commission from the Benefits & Homeless Prevention Service.

Recommendation 1

The Social Housing (Regulation) Act received royal assent in July 2023. The Act lays foundations for changes to how social housing is managed. It includes increased regulation of social landlords and new rules for protecting tenants from serious hazards in their homes.

An amendment proposed in the debate on the (then) Social Housing (Regulation) Bill would, if adopted, have tightened up regulation of the enforcement of the homelessness code of guidance for temporary accommodation. But this was rejected by Government on the grounds that the amendment was outside the scope of the bill.

It should be noted that the Council, along with most other Local Authorities, utilises a wide range of tenure options when seeking to provide temporary accommodation, drawing on both the social and private housing sectors.

As such any legislative framework that monitors and or enforces standards would need to be applied to both social and private landlords. With this in mind it would require amendments to Parts 9 and 10 of the Housing Act 1985 and Parts 1 to 4 of the Housing Act 2004, which relate to the standards of accommodation.

Additionally, the supply of suitable accommodation that is affordable is limited and consequently TA residents are being dispersed across London and beyond. The dispersal picture is driven by availability and affordability and is therefore not static, but increasingly the Council is required to source accommodation outside of London.

The Council always seeks to place a household in a suitable TA property; Council officers arrange to visit homes that are used for TA to thoroughly assess the condition of the property. The Council is also working with London Councils and other partners to improve the quality of TA. This includes being part of the Setting the Standard programme, a pan-London service which works to ensure that Bed & Breakfasts and Studio flats used by Local Authorities for nightly paid TA meet a decent level of quality and management standards. This shared service provides a central inspections team, ensuring that a TA home is subject to a high-quality inspection on at least an annual basis.

The Council continues to lobby Government on a range of housing issues to ensure both policy and legislation takes a balanced and relevant approach to supporting the Council deliver for its residents and for all those in need. This includes the powers required to raise standards across both the private and social housing sectors and the capacity and powers required to increase the supply of affordable accommodation in London to reduce the long term need for TA.

Recommendation 2

Hackney always seeks to ensure that the households placed into TA are placed in TA of good quality that is suitable to their needs, that residents are supported to access all the services they need including health services and that residents are supported to find settled accommodation.

It remains the case that the intense demand for affordable housing both in the borough and across all London, makes meeting the supply of TA commitment extremely challenging to fulfil. Unfortunately recent Government announcements about an increase in funding to meet TA costs still go nowhere near addressing the actual costs Councils are faced with across London.

The Council's hostel managers, caretakers and officers play a key role in monitoring and maintaining health and safety standards within the TA portfolio. Residents in Council offered TA can expect the property to meet LBH's Decent Homes Standards.

The Council is also a partner in the Setting the Standard programme, a pan-London service which works to ensure that Bed & Breakfasts and Studio flats used by Local Authorities for nightly paid temporary accommodation meet a decent level of quality and management standards. This shared service provides a central inspections team, ensuring that accommodation receives a high-quality inspection on at least an annual basis.

For Council owned hostel properties the Council has initiated a £16m five year programme to repair and maintain the properties to the required health & safety standards including fire safety works. The Benefits & Homeless Prevention Service have a TA Health & Safety Manager to monitor and progress this at pace and coordinate delivery with the Council's contractors.

For households with children, living in TA presents unique challenges, and the Council offers additional support to this group, for example, it works with CARIS Families, a grassroots charity that runs support services for homeless children and their parents living in hostels in

the London Boroughs of Camden and Hackney. The organisation operate an after-school club at Royal Park Hostel, offering play and arts and crafts activities to resident children and a Homework Club offering one-to-one academic help and mentoring to school-age residents. Hackney Playbus also provide play and support services to families who need it the most. Playbus visit the hostels to deliver play sessions providing a variety of resources and activities that support children's early learning and development in all areas of the Early Years Foundation Stage.

The Council recognises that even with the best facilities TA is not the ideal situation for residents, particularly children. The Benefits & Homeless Prevention Service supports residents explore all settled housing options to enable them to secure a permanent home that meets their needs.

Recommendation 3

In updating the 2024 - 2026 Homelessness & Rough Sleeping Strategy, the Council consulted with residents on their views and concerns. The Council is planning to extend and expand this engagement with residents on the further development of the strategy for 2026 - 28 and based on the implementation outcomes of the 2024 - 26 strategy.

However, currently the Benefits & Homeless Prevention Service does not have funding available to put in place TAAG's groups as suggested by the Living in Hackney Scrutiny Commission. This could be an additional function incorporated into the community engagement work undertaken by the Corporate Partnership team through the advice grants programme or worked up as part of the 2026 - 28 strategy.

Some of the partners present at January's LBH led Homelessness Partnership Board expressed an interest in contributing to the development and delivery of the Homelessness and Rough Sleeping Strategy action plan. The contribution of partners and stakeholders will ensure the action plan identifies the key issues and ways we can work together to address them.

The Service continues to work closely with the advice services and the voluntary sector and are always open to work with support organisations who residents are engaged with.

Within the Council the Service is working with the Policy and Strategic Delivery Team on how the Council can raise the profile of the Council's response to increasing homelessness with community partners and develop trusted relationships between Council services and external partners to enable collaboration between the Council, other anchor institutions including health partners and the wider VCS.

Recommendation 4

The Council recognises that the LCBTQIA+ community face specific and intense social and cultural barriers that increase the likelihood of homelessness. In addition this community can also face challenges when living in TA.

The 2024 - 26 Homelessness and Rough Sleeping Strategy acknowledges that “LGBTQI+ residents face significant challenges in accessing affordable and secure housing compared to non-LGBTQI+ residents, with transgender individuals particularly experiencing higher levels of discrimination and risk of homelessness. This discrimination can create or exacerbate housing instability for LGBTQI+ residents throughout their adult lives. Tackling this inequality is identified as one of the key themes within the strategy.

With the new strategy now in place, the service will be developing an Action Plan detailing the proposed activities, expected outcomes, performance targets and outcomes. The Action Plan will evolve over the duration of the strategy to enable the Council to respond to external pressures and demands.

As an integral part of the Action Plan, the Service will be engaging with community partners and residents to identify the actions to take forward the objectives set out in the strategy. Partners will also be central to reviewing and responding to delivery on an ongoing basis. It is the Council's intention that this engagement includes organisations from across the community, including those supporting LGBTQI+ residents.

The Service have worked closely with partners and stakeholders to deliver the 2024 - 2026 strategy and have already made the first steps to deliver a comprehensive action plan with partners at the recent Homeless Partnership Board meeting. Going forward the Service would welcome the opportunity to report progress on the delivery of the plan to the Commission if that may be of value.

In conclusion, please accept our thanks to all Members of the Scrutiny Commission for their observations and comments on the 2024 -2026 Homeless and Rough Sleeping Strategy and for helping to deliver the Council's ongoing response to the housing crisis and tackling homelessness in the community.

Regards



Cllr Guy Nicholson, Deputy Mayor for delivery, inclusive economy & regeneration



Cllr Sade Etti, Deputy cabinet member for housing needs and homelessness