

A review of homelessness in the local authority district of Eden

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Eden District Council

Eden District Council is a non-unitary local authority area founded in 1 April 1974, its headquarters are in Penrith. The Council's leadership consists of a Chairperson and a Leader the Executive currently has no overall control. The total area of the district is 827 square miles, the total population is 52,564, with 99.6% being of a white ethnic origin. Parts of the Lake District National Park and Yorkshire Dales National Park are in the district.

Neil Morland & Co

Neil Morland & Co are housing consultants working throughout England, Scotland and Wales. Formed in 2011, our ambition is to reduce housing inequalities by improving social policies. We provide specialist advice on homelessness, housing allocation and supported living.

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Executive summary

1. Levels of homelessness

Eden's levels of homelessness are significantly lower compared to Cumbria, the North West and England, with numbers falling over the past five years. Locally, the number households in temporary accommodation has increased, however this remains relatively low compared to elsewhere. Eden has a higher rate of single homeless males compared to elsewhere, however local levels of rough sleeping are very low.

Eden's future levels of homelessness are likely to increase, due to house prices to earnings ratios being less favourable compared other areas.

2. Preventing homelessness

Voluntary organisations provide comprehensive range of housing services available in Eden, to assist people who are homeless or threatened with homelessness. Housing associations have demonstrated a commitment to tackling homelessness. Eden District Council commission Eden Housing Association to administer statutory homelessness functions, this arrangement is achieving excellent outcomes for both organisations and people at risk of homelessness.

Eden District Council and Cumbria County Council cooperate well to prevent homelessness for young people. Targeted homelessness prevention activities are needed for offender leaving the secure estate, patients leaving hospital, vulnerable adults, and those with poor health. Eden District Council, together with neighbouring local housing authorities, established pilots for helping armed forces veterans and victims of domestic abuse that are homeless or threatened with homelessness.

Eden Housing Association carry out a range of activities to prevention homelessness, but more could be done to help people remain in their existing homes.

3. Securing accommodation

Eden Housing Association has established a private sector leasing arrangement to procure more temporary accommodation.

Eden Housing Association needs to improve the range of activities carried out to relieve homelessness. Housing associations need to consider what more they could do help tackle homelessness.

Eden Housing Association helps people who are homeless, to access the private rented sector. Eden District Council can build on its private rented sector enforcement work, to provide more services to landlords.

The Cumbria Choice housing allocation scheme prioritises people who are homeless or threatened with homelessness, for an allocation of social rented housing. However, the allocation scheme requires altering to ensure it complies with current statute.

4. Providing support

Households where dependent children reside, victims of domestic abuse, and people living in rented accommodation, all need support with the causes of their homelessness, and to avoid a repeat occurrence of homelessness.

Cumbria County Council funds a range of housing support, including specific provision for victims of domestic abuse and young adults. A better understanding supports needs is required to be confident that current provision is adequate.

Voluntary organisations provide a wide range of support to people who are homeless or threatened with homelessness. A directory of services would be beneficial.

5. Resources

Eden District Council benefits from allocations of funding from the Ministry of Housing, Communities and Local Government, however, opportunities to secure more money need to be pursued.

Eden Housing Association has sufficient staffing levels, but will need to continually monitor this remains true.

Eden District Council has purchased a new IT system, to aid the administration of homelessness services. Eden Housing Association needs to facilitate remote access to the IT system.

1.0 Introduction

1.1 Preamble

This review considers all of the activities being carried out to tackle homelessness in the local authority district of Eden. This encompasses the public law homelessness functions that Eden District Council is responsible for, many of which are contracted out to Eden Housing Association, plus those also provided by public authorities, voluntary organisations and others.

The decision by Eden District Council to appoint an independent consultant to complete this homelessness review, ensured impartiality and transparency in the findings.

The aim of this homelessness review, has been to identify if the activities for tackling homelessness in the Eden district, are reflective of good practice, delivering good outcomes for people experiencing homelessness, and are of value for money to the public purse.

The commencement of new homelessness legislation from April 2018, is an important contextual factor to this review. The enactment of the Homelessness Reduction Act 2017 (HRA17), brought about the most significant change to homelessness law in 40 years. The improved rights of people who are at risk of homelessness, are equally matched with the additional responsibilities of local housing authorities.

The ambition for this review of homelessness is to identify key priorities for tackling homelessness in the Eden district, which can be carried forward to form a new homelessness strategy for the district.

1.2 Definition of homelessness

The law¹ defines a person being homeless or threatened with homelessness if they:

- Have no accommodation (eg sleeping rough);
- Have accommodation, but it is unavailable to them (eg due to an emergency or disaster);
- Have accommodation, but no right to occupy it (eg squatting, or informal arrangements with family, friends or others);
- Have accommodation, but it is unreasonable to occupy (eg due to it being unaffordable, unfit, overcrowded, being victim of domestic abuse, or another special reason);
- Have accommodation, but it will not be available within 56 days (eg due to being asked to/required to leave, by either family, friends or others, or from public authority institution);

¹ Housing Act 1996, Part 7, section 174

- Have accommodation, but have been served a valid notice of eviction by their landlord (eg Section 21 notice to bring an assured shorthold tenancy to an end);
- Have accommodation, but is not available for the whole household (eg due to a household member requiring an aid or adaptation to access and/or move around it).

There is considered to be four forms of homelessness². A person might experience only one of these forms, but could encounter some or all of them:

- statutory homelessness – persons owed the main duty of assistance by a local housing authority;
- single homelessness – persons living in supported housing (including hostels, refuges and also supported lodgings), usually commissioned by a local authority;
- street homelessness – persons sleeping rough in places not designed for habitation;
- hidden homelessness – persons accommodated in insecure arrangements often with relatives or friends, but just as often with people not previously known to them.

The Ministry of Housing, Communities and Local Government (MHCLG) (the UK Government department responsible for homelessness policies and programmes), has defined street homelessness, as ‘people sleeping, or bedded down, in the open air (such as on the streets, or in doorways, parks or bus shelters); people in buildings or other places not designed for habitation (such as barns, sheds, car parks, cars, derelict boats, stations, or ‘bashes’)³.

1.3 Methodology

Our approach to completing this homelessness review complies with the obligations explained in the Homelessness Act 2002⁴. This legislation requires that a review must be carried out at least every five years. This review covers the period of 2013/2014 – 2017/2018.

On this occasion, an essential part of this review is to consider the impact of the HRA17, and what service gaps this new law might have created. The review provides an analysis of the potential future impact on the levels of homelessness presentations and subsequent prevention work, plus provides recommendations to inform how homelessness services may need to change and adapt to meet these new duties.

When undertaking this review, we assessed the levels and patterns of homelessness and identified any gaps in knowledge and services.

The core activities underpinning the steps to produce the review were to identify:

² Fitzpatrick, S. (2005), ‘Explaining homelessness: a critical realistic perspective’, *Housing & Society*, 22(1): pp.1-17

³ Department for Communities and Local Government (2010), ‘Evaluating the extent of rough sleeping.

⁴ Homelessness Act 2002, sections 1 - 3

1. Homelessness prevention actions;
2. Accommodation for people who are homeless;
3. Support for people who are, or have been, homeless.

Throughout the duration of the review, we worked closely with the housing officers from Eden District Council, plus officers responsible for adult care and children's services from Cumbria County Council (CuCC). Additionally, a great deal of cooperation was provided by Eden Housing Association, plus numerous other voluntary sector organisations also made contributions. We gathered information and evidence from these services, all of which helped to shape the conclusions of this review.

In addition to Eden Housing Association, other providers of social housing co-operated with this review. Their input provided an understanding of how homelessness prevention initiatives, and tenancy sustainment work, has been embedded into their businesses.

Throughout the duration of the review, we sought to build a strong relationship between numerous departments and agencies. We were especially keen to ensure involvement from the voluntary sector, along with co-operation from a wide-range of public authorities. The involvement of commissioners of housing support services was crucial. We undertook consultation with public authorities (eg National Probation Service, Jobcentre Plus) and voluntary organisations (eg Citizens Advice). We also spoke with people who were experiencing homelessness (or had done so previously), to get their views about what works, possible barriers to services and any suggestions for improvements.

When carrying out this review, we took account of Eden District Council's own housing allocation scheme, operated via the Cumbria Choice partnership, with neighbouring local authorities and a number of housing associations (including Eden Housing Association), plus the local tenancy strategy, a plan held jointly with South Lakeland District Council (SLDC).

This review audited the local:

- Levels and likely future levels of homelessness;
- Activities carried out for preventing homelessness, securing accommodation and providing support;
- Resources available for carrying out the above activities.

This review focuses on those who have previously been homeless, were homeless at the time of the review, or might be homeless in the future. The entire legal definition of homelessness, along with all four forms of homelessness, were considered as part of this review.

To ascertain the current levels of homelessness, and to predict what these levels might be in the future, we accessed records and statistics held by Eden District Council, Eden Housing Association, CuCC and voluntary organisations. This included homelessness case records and estimates of people sleeping rough. To help forecast future levels of homelessness, we drew up profiles of those who have experienced homelessness, alongside considering district-wide child poverty rates and local labour and housing market factors.

Primary research was carried out with local public authorities and voluntary organisations. Quantitative data was sought from a wide range of public bodies and charities. There was reliable data from Eden District Council and Eden Housing Association about the levels of homelessness and temporary accommodation. Limited information was available on homelessness prevention and support. Some limited data was available from other sources on securing accommodation and providing support. Much more qualitative evidence was collected from key stakeholders about their activities, especially from Eden Housing Association and Eden District Council.

When considering the activities being carried out for tackling homelessness, we considered services of all the various agencies and organisations, across all sectors, which are contributing towards preventing homelessness, supplying accommodation, and/or providing support. This included an emphasis on the supply of accommodation available, the steps being taken to increase the supply, and also took account of the demand for housing.

Our interrogation of resources available to tackle homelessness looked at those available to Eden District Council and Eden Housing Association, plus also other public authorities, voluntary organisations, and others. For this report, resources are not the purely financial, but include infrastructure (eg employee) and physical (eg IT) resources.

The results of this review are being used to inform a new homelessness strategy for Eden. The strategy will have specific objectives for:

- Preventing homelessness;
- Obtaining suitable accommodation for those who are, or may become homeless;
- Providing support to those who are, or used to be, homeless, to prevent them from becoming homeless again.

A range of recommendations have been identified for the Eden District Council and Eden Housing Association, along with any other organisation involved with tackling homelessness. Specific conclusions have been included for people whose risk of becoming homeless is more likely.

1.4 National homelessness context

The UK Government's central focus of its homelessness policy, is an ambition to halve rough sleeping by 2022 and to end it by 2027⁵. The adoption of this commitment was preceded by a rise in rough sleeping to a record high, from a baseline of 1,768 counted people sleeping rough on any given night in 2010, to 4,134 in 2016. These levels increased further by 13% to 4,751, following which numbers reduced by 2% to 4,677 for 2018⁶.

⁵ Conservative and Unionist Party. (2017). Manifesto 2017: Forward, Together: Our plan for a stronger Britain and a prosperous future

⁶ White, J., Maguire, E. (2019). Rough sleeping statistics Autumn 2018, England (revised). Ministry of Housing, Communities and Local Government. London.

Alongside the rise in rough sleeping there has been an increase in the number of households living in temporary accommodation. Levels reduced by 50% over a five-year period record low to 48,240 on 31 March 2011, subsequently, usage has climbed upwards by 41% to 80,270 at 31 March 2018. The Local Government Association (LGA) responded to rising concern from councils about the increasing pressures being faced across the country, by publishing guidance for local authorities on housing homeless households⁷. The impact of homelessness on health was the subject of a separate report published by the LGA⁸. The guide included information and ideas on how local authorities could protect and improve health and wellbeing and reduce health inequalities, by tackling homelessness and its causes.

Following this was the introduction of changes to homelessness law, that afforded more people who are at risk of homelessness, extra rights to assistance, at an earlier stage, over a longer period. The HRA17 came into force from April 2018⁹, resulting in local authorities having extended duties to prevent homelessness. Alongside this are new responsibilities to relieve homelessness, plus a requirement to complete an assessment and formulate an action plan for each eligible person who seeks assistance to resolve their homelessness¹⁰. Local authorities were awarded £72.7m by MHCLG to assist with the administration of the new burdens arising from the new legislation¹¹.

A new duty to refer cases of homelessness to local authorities, came into force for specified public authorities from October 2018, throughout England¹². This new obligation, connected to the Homelessness Reduction Act 2017, is to ensure people identified as being at risk of homelessness are able to get advice and assistance at the earliest stage possible. Separately, the LGA published non-statutory guidance for local authorities promoting the opportunities to cooperate to tackle homelessness, that the duty to refer can help to foster¹³.

Also in October, MHCLG published a PRS access funding prospectus, inviting local housing authorities to bid for a share of £20m¹⁴. The money was allocated across 54 projects¹⁵.

In conjunction with the new legislation, the MHCLG published updated statutory guidance in February 2018 (last updated February 2019), to aid local authorities in

⁷ Gray, T., Messenger, G. (2017) Housing our homeless households. Local Government Association. London

⁸ Leng, G. (2017). The impact of homelessness on health: a guide for local authorities. Local Government Association. London

⁹ The Homelessness Reduction Act 2017 (Commencement and Transitional and Savings Provisions) Regulations 2018

¹⁰ Homelessness Reduction Act 2017

¹¹ <https://www.gov.uk/government/publications/homelessness-reduction-act-new-burdens-funding> Home

¹² The Homelessness (Review Procedures etc) Regulations 2018, Part 1, section 3; Part 4; Schedule, Specified public authorities

¹³ Morland, N., Paterson, L., Griffiths, L. (2018). Duty to refer: an opportunity to co-operate to tackle homelessness. Local Government Association. London

¹⁴ Ministry of Housing, Communities and Local Government. (2018). £20m private rented sector access fund: Bidding prospectus

¹⁵ Ministry of Housing, Communities and Local Government. (2019). Press release. Housing Minister unlocks private rented sector for most vulnerable

the performance of their homelessness functions¹⁶. Separate guidance was also published joint with the Department of Education, on the provision of accommodation for 16 and 17 years-olds who may be homeless and/or require accommodation¹⁷. The MHCLG introduced changes to the recording of statutory homelessness statistics collected by local government, from April 2018¹⁸. This followed criticism from the then Communities and Local Government Select Commons Select Committee, plus also the UK Statistics Authority, both of which cited concerns on the accuracy and reliability of the homelessness statistics published by the national government¹⁹.

A new rough sleepers initiative was launched by MHCLG in March 2018²⁰, with £30m being shared across 83 local authority areas, in June 2018²¹. A further allocation of £46m was made in March 2019, to 246 areas throughout the nation, (encompassing the original 83 areas, plus an extra 12). This money was used to fund additional staff, plus outreach and accommodation services²².

£28m funding allocated by MHCLG in May 2018, between three Combined Authority areas, to reduce rough sleeping by piloting the Housing First approach²³.

The LGA launched its Housing Advisers Programme, in June 2018²⁴. Local authorities were invited to bid for funding awards of between £14k - £28k, to get support to deliver projects that help meet the housing need of their local area, including tackling homelessness. In July 2018, the LGA published a case study, about the use of three online tools to transform the way people across Kent and Medway gain access to homelessness support²⁵.

MHCLG published a £100m plan to end rough sleeping in England, focusing on prevention, intervention and recovery, in August 2018²⁶. Following this, a delivery plan for the strategy was published in December 2018, setting out how the 61

¹⁶ Ministry of Housing, Communities and Local Government. (2018). Homelessness Code of Guidance for local authorities

¹⁷ Ministry of Housing, Communities and Local Government, Department for Education. (2018). Prevention of homelessness and provision of accommodation for 16 and 17-year old young people who may be homeless and/or require accommodation. Guidance to children's services authorities and local housing authorities about their duties under Part 3 of the Children Act 1989 and Part 7 of the Housing Act 1996 to secure or provide accommodation for homelessness 16 and 17 year old young people

¹⁸ Department for Communities and Local Government. (2017). Homelessness Case Level Information Collection (H-CLIC) data monitoring specification for monitoring of the Homelessness Reduction Act 2017 Version 1.1

¹⁹ UK Statistics Authority. (2105). Assessment of compliance with the Code of Practice for Official Statistics: Statistics on homelessness and rough sleeping in England (produced by the Department for Communities and Local Government). Assessment Report 320.

²⁰ Ministry of Communities and Local Government (2018). Press release: New government initiative to reduce rough sleeping

²¹ Ministry of Communities and Local Government (2018). Press release: James Brokenshire announces £30m immediate support for rough sleepers

²² Ministry of Communities and Local Government (2018). Press release: James Brokenshire confirms funding to help people off the streets

²³ Ministry of Communities and Local Government (2018). Press release: Housing Secretary James Brokenshire awards funding to reduce rough sleeping

²⁴ Local Government Association (2019). Housing Adviser Programme 2018/19 prospectus

²⁵ Local Government Association (2018). Case study. Kent Homechoice: providing digital support for housing and homelessness

²⁶ Ministry of Communities and Local Government (2018). Rough sleeping strategy

commitments made in the strategy would be accomplished. It also outlined the progress that had been made thus far²⁷.

A £50m funding prospectus was published in August 2018, to provide capital grants for local authorities outside of Greater London, via Homes England²⁸. This Move-On Fund aims to free up hostel and refuge spaces by increasing the availability of affordable move-on, or second stage housing, for rough sleepers and those in hostel accommodation, and victims of domestic abuse currently living in refuges who are ready to leave this type of provision but might otherwise not be in a position to access the next stage of housing.

MHCLG published an independent evaluation of the Skills, Training, Innovation and Employment (STRIVE) pilot, in August 2018²⁹. This programme was targeted at single people experiencing homelessness in London, who were claiming unemployment welfare benefits. MHCLG and the Department for Business, Innovation and Skills (now known as Department for Business, Energy and Industrial Strategy) provided £297,000 funding. STRIVE was commissioned to pilot an alternative to the Work Programme, which had been identified as being unsuitable for the target cohort. Crisis and St Mungo's, successfully met a target of supporting 121 people over two years, from April 2014, additional funding extended the pilot for third year until in April 2017. Nearly 50% of participants in the pilot were helped to enter into education, volunteering or employment, with 15 (14%) individuals starting into work compared to a 4% success rate from those on the Work Programme. The evaluation concluded that the STRIVE pilot should be upscaled, with joint working alongside Job Centreplus being key to sustaining the approach taken. The STRIVE approach was deemed to be more effective than comparable methods of helping people in the same circumstances of similar characteristics. The evaluation concluded that the STRIVE pilot represented value for money.

In December 2018, 11 local authority areas across England were announced as early adopters for MHCLG's Rapid Rehousing Pathway programme, each sharing a portion of £5m funding³⁰. The 11 early adopter areas will focus on introducing the Somewhere Safe to Stay rapid assessment hub model. The areas will also be provided with funding for Navigators, Supported Lettings, and Local Lettings Agencies projects where a need for these additional elements has been identified. An additional 42 early adopters were announced in February 2019³¹. In March 2019, local authorities were invited to make a bid for a share of £19m, for any or all elements of the Rapid Rehousing Pathway which they feel are appropriate³². Funding

²⁷ Ministry of Communities and Local Government (2018). Rough sleeping strategy: delivery plan

²⁸ Homes England (2018). Move on fund prospectus

²⁹ ICF Consulting. (2018). STRIVE Evaluation: Final report. Ministry of Housing, Communities and Local Government. London

³⁰ Ministry of Communities and Local Government (2018). Press release: James Brokenshire announces £5m for new network of rough sleeping hubs

³¹ Ministry of Communities and Local Government (2019). Guidance: Additional 42 early adopters

³² Ministry of Housing, Communities and Local Government (2019). Rough sleeping strategy: rapid rehousing pathway 2019/20 prospectus

allocation were in May 2019³³. 108 areas across England received a share of the budget.

The MHCLG announced a £38m investment to support an enterprise, named Capital Letters, which will help to reduce the expense to local authorities of obtaining accommodation, while driving up the quality of such provision. The scheme is forecast to help 35,000 households over the next three years³⁴.

The MHCLG launched a consultation on local accountability and deliverability of homelessness services, across England, from February – May 2019. Consultees were encouraged to submit their views on proposals to improve accountability and deliverability of partnership structures and working for tackling homelessness³⁵.

An extra £1m of funding was made available by MHCLG in March 2019, to support veterans who have become homeless, or are at risk of becoming homeless. The funding was shared amongst the ten combined authority areas, plus the Greater London Authority³⁶.

Prior to the first anniversary of the Homelessness Reduction Act 2017 coming into force, the LGA published the results of a survey conducted with councils, which gathered information on their experiences of the new legislative framework since its implementation³⁷. The survey findings showed that most councils had seen an increase in homelessness presentations and use of temporary accommodation.

The MHCLG issued findings from an external evaluation of its £20m Homelessness Prevention Trailblazer programme, in March 2019³⁸. This study showed the approaches piloted by the participating local authorities were having a positive impact for those persons owed a 56-day duty of assistance. An example of a successful intervention, was joint working with Jobcentre Plus training coaches to be better at identifying people at risk of homelessness.

MHCLG with the Department for Work and Pensions (DWP) published independent research on the causes of homelessness and rough sleeping^{39 40 41}. An assessment of

³³ Ministry of Communities, Housing and Local Government. (2019). Rapid Rehousing Pathway: 2019 to 2020 funding allocations

³⁴ Ministry of Communities and Local Government (2018). Press release: £38 million to boost accommodation for London's homeless

³⁵ Ministry of Housing, Communities and Local Government (2019). Tackling homelessness together a consultation on structures that support partnership working and accountability in homelessness

³⁶ Ministry of Communities and Local Government (2018). Press release: Brokenshire announces funding boost for homeless veterans

³⁷ Local Government Association Research and Information Team. (2019). Homelessness Reduction Act survey 2018 – survey report. Local Government Association. London

³⁸ Knight, T., Purdon, S., Lloyd, R., Bryson, C. (2018) Evaluation of the Homelessness Prevention Trailblazers, Ministry of Housing Communities and Local Government. London

³⁹ Alma Economics (2019). Homelessness: causes of homelessness and rough sleeping rapid evidence assessment. Ministry of Housing Communities and Local Government and Department for Work and Pensions. London

⁴⁰ Alma Economics (2019). Homelessness: causes of homelessness and rough sleeping review of models of homelessness. Ministry of Housing Communities and Local Government and Department for Work and Pensions. London

⁴¹ Alma Economics (2019). Homelessness: causes of homelessness and rough sleeping feasibility study. Ministry of Housing Communities and Local Government and Department for Work and Pensions. London

evidence concluded that for families there was strong evidence of poverty and lack of social housing being the causes of homelessness. For single persons there was strong evidence that relationship breakdown, mental health and substance misuse were the causes. In terms of rough sleeping, the strongest causes identified was relationship breakdown. Structural factors were more likely to cause homelessness for families, whereas, individual personal factors caused single persons to become homeless, and individual health related factors was the cause of street homelessness. The researchers went on to conclude that a mixture of quantitative and qualitative methods need to be used to understand the current and future likely causes of homelessness, plus the impact policies are, or might have, on preventing and reducing homelessness. It was recommended that MHCLG and DWP develop a range of sophisticated modelling tools, that produce detailed information to better understand the causes of homelessness, but which are easy to use and maintain their in-house analysts.

MHCLG published independent evaluation of its Fair Chance Fund programme, in April 2019⁴². Taking place throughout England, MHCLG, The Cabinet Office and Department for Digital, Culture Media and Sport provided funding via Social Impact Bonds (SIB), using a payment by results (PBR) approach to improve accommodation, education and employment for people aged 18 to 24 years, who were experiencing homelessness. The young people who participated in the programme were not in education employment or training, and had been assessed as not have a priority need for accommodation in accordance with homelessness law. Seven projects successfully bid to participate in the programme, which took place from January 2015 until December 2017. The programme saw some good housing outcomes, plus positive outcomes on education and training and volunteering and employment. The SIB-based approach and use of PBR were judged to have effective results, and with some amendments could be replicated in other programmes.

1.5 Structure of this report

Chapter two reviews the current and future likely levels of homelessness. Chapter three reviews the activities for preventing homelessness. Chapter four reviews the activities for securing accommodation for people who are homeless. Chapter five reviews the activities for supporting people who have previously been, are presently, or might be in the future, homeless. Chapter six reviews the resources available to carry out the aforementioned activities. Chapter seven sets out the conclusions and recommendations from the review.

⁴² ICF Consulting. (2019). Fair Chance Fund: Final Evaluation. Ministry of Housing, Communities and Local Government. London

2.0 Levels of homelessness

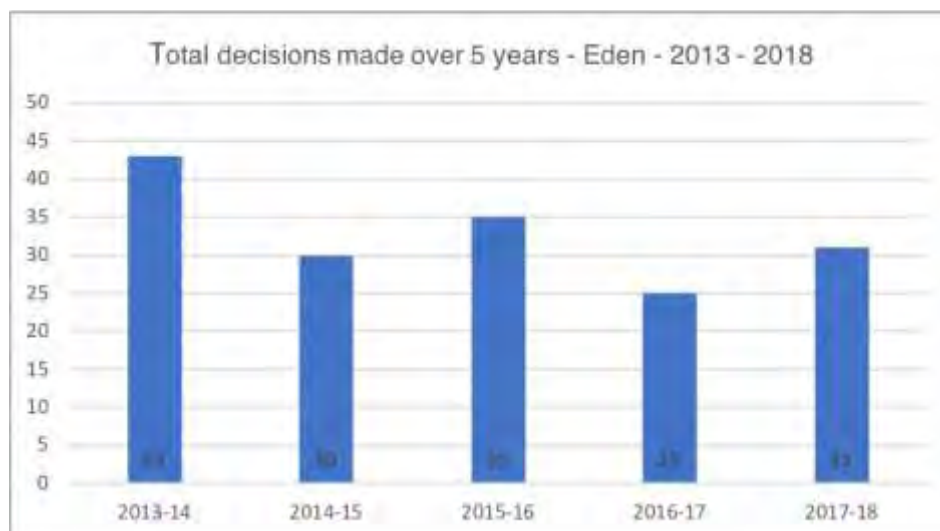
The chapter considers the current and future likely levels of homelessness in Eden, comparing these to regional and national trends.

Eden Housing Association collects a significant amount of statistics on statutory homelessness on behalf of Eden District Council, plus some intelligence on single and street homelessness. There is no coordinated collection of statistics on hidden homelessness from either public authorities or voluntary organisations, however, this is typical of elsewhere in the country. It has been predicted that the levels of hidden homelessness are thirteen times higher than street homelessness, with young people, persons who identify as lesbian, gay, bisexual and/or transgender, and those escaping domestic abuse, being more likely to experience this form of homelessness⁴³.

Criminal justice agencies monitor the number of offenders who leave prison with no fixed abode. While this data is submitted to national governments, local authorities do not benefit from having this intelligence shared with them.

2.1 Current levels of homelessness

The number of decisions made by Eden Housing Association over the five-year period preceding this review (2013–2018) has reduced. The majority of decisions taken over the last five years relate to households that are eligible, but not homeless. The ethnic origin of all applicant households is predominately white and aged between 25-44. One-person male households are the majority household type of all households found to be eligible, unintentionally homeless and in priority need.



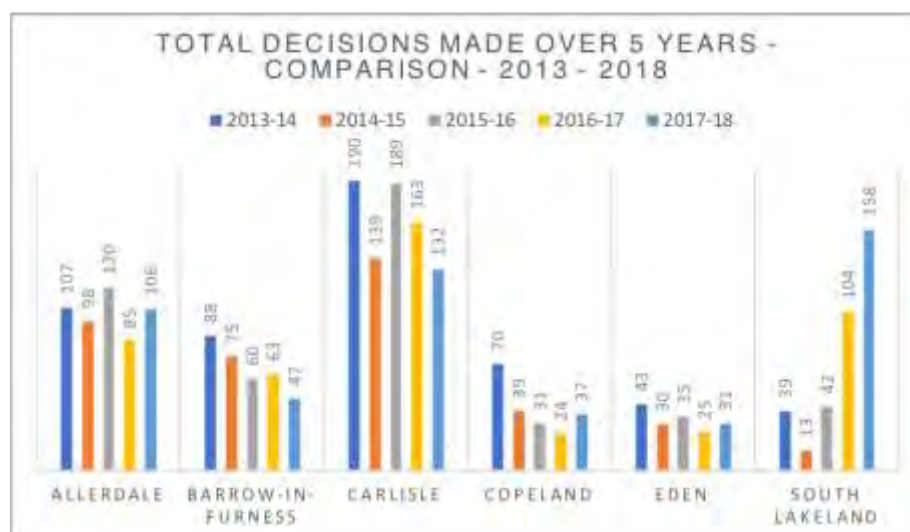
Source: Eden District Council. P1E.

The chart above shows the total number of homelessness decisions taken by Eden Housing Association, over the last five years. The total number of decisions recorded shows an overall reduction from 2013-2014 with an average number of 33 decisions

⁴³ London Assembly Housing Committee (September 2017), Hidden homelessness in London

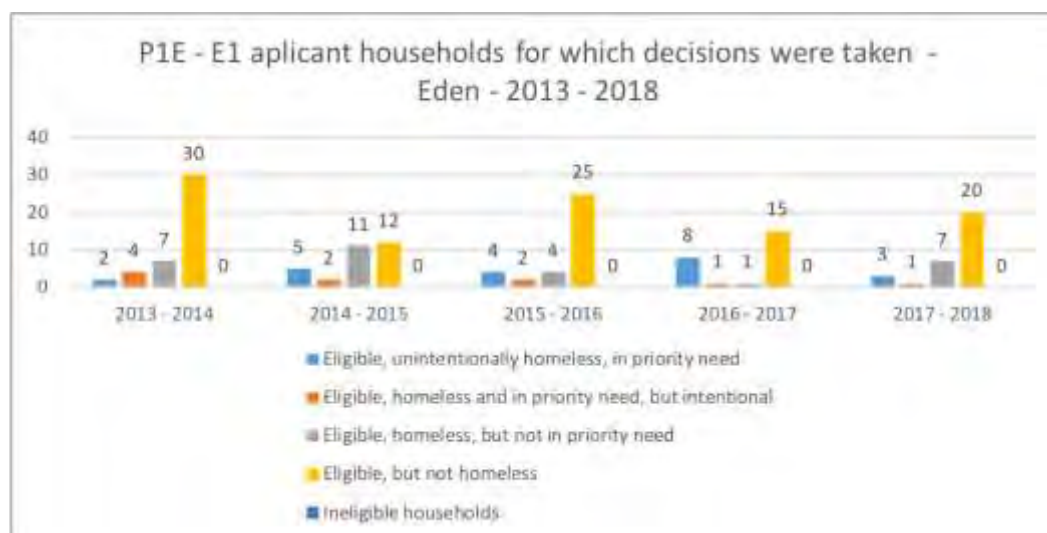
made each year over the five-year period and an average of 30 decisions recorded between 2015-2016 and 2017-2018.

With the exception of SLDC (recording a 305% increase) an overall reduction in decisions can be seen across five of the six Cumbrian districts.



Source: Ministry of Communities and Local Government. Homelessness Live Table 784.

The majority (62%) of decisions taken over the last five years relate to households that are eligible, but not homeless. Those who were eligible, unintentionally homeless with no priority need, totalled 18%, and those who were eligible, unintentionally homeless and in priority need, totalled 13%.

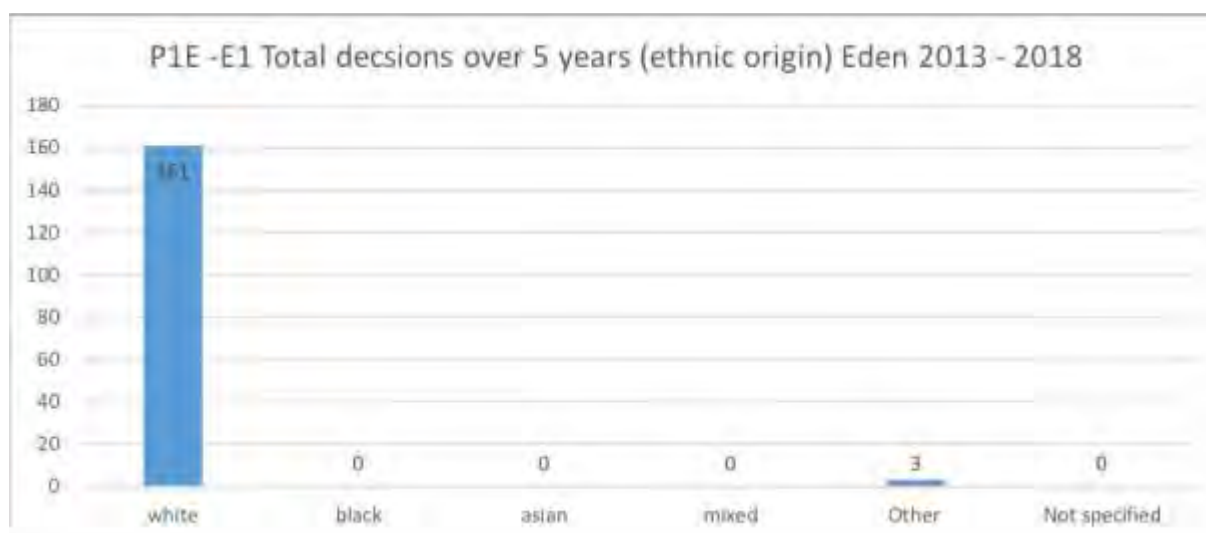


Source: Eden District Council. P1E.

E1: applicant households for decision taken	Total (2013-2018)	Percentage (%)
Eligible, unintentionally homeless, in priority need	22	13
Eligible, homeless and in priority need, but intentional	10	6
Eligible, homeless, but not in priority need	30	18
Eligible, but not homeless	102	62
Ineligible households	0	0

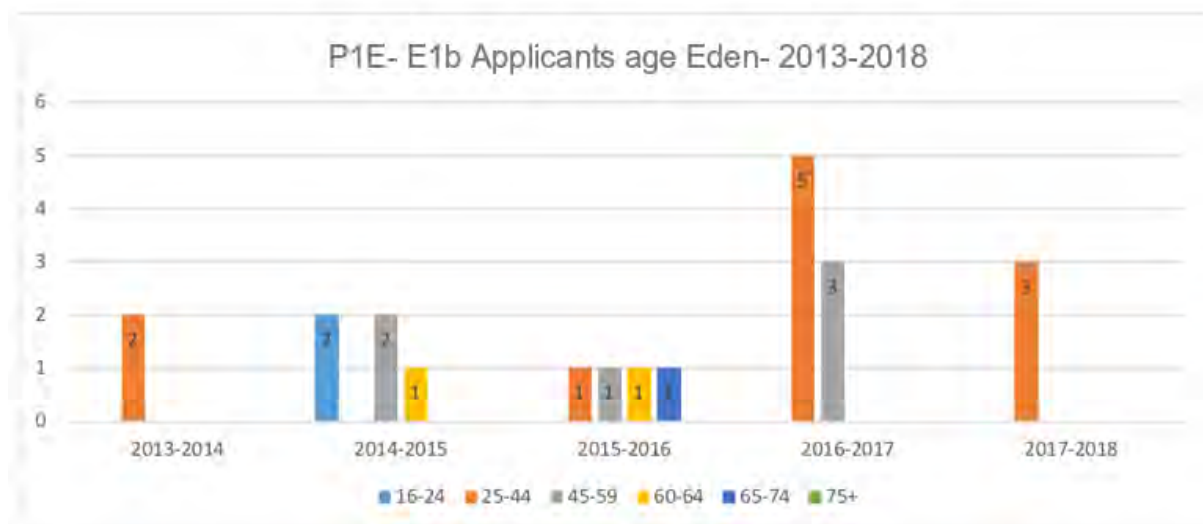
Source: Eden District Council and Eden Housing Association. P1E.

Over the five-year period 2013–2018, the ethnic origin of applicant households that a decision was taken on was predominately white, at the rate of 98%.

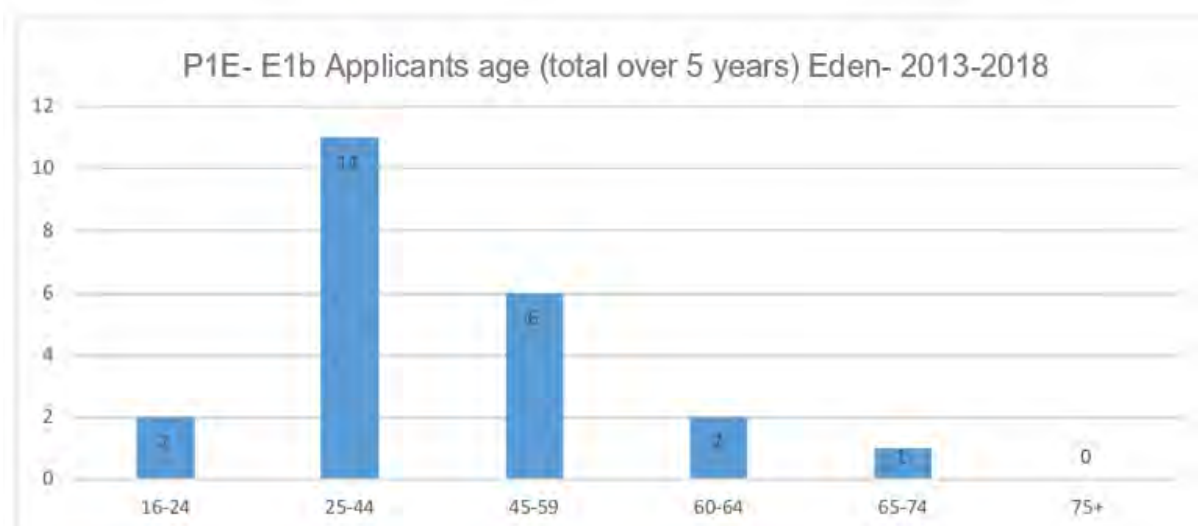


Source: Eden District Council. P1E.

Of those accepted as eligible, unintentionally homeless and in priority need, 50% were aged 25-44, and 27% aged 45-59. A significant increase in the number of applicants aged 25-44 is recorded in 2016-2017 and 2017-2018.



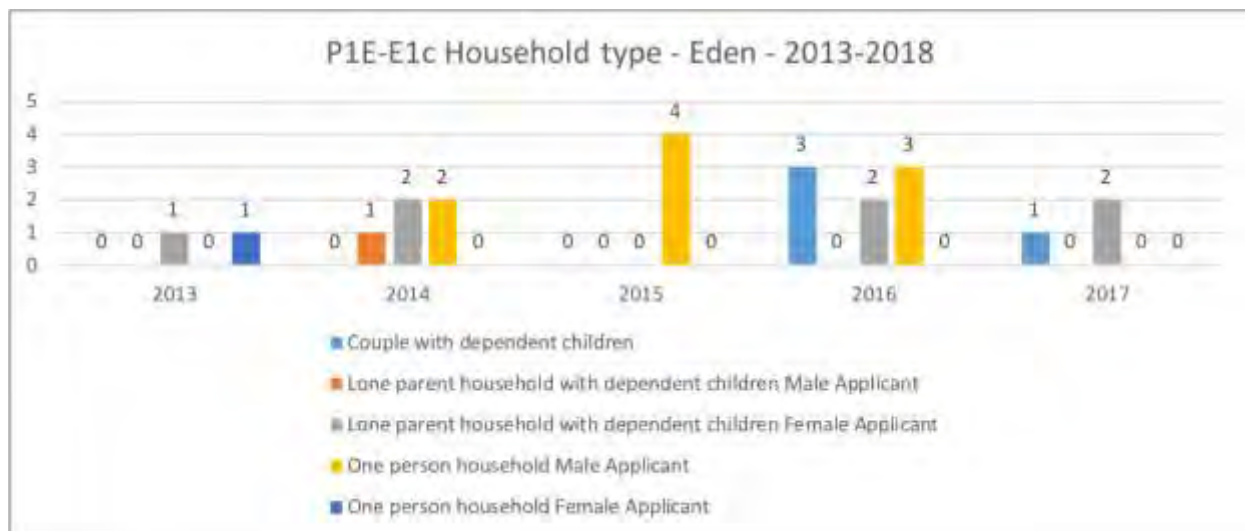
Source: Eden District Council. P1E.



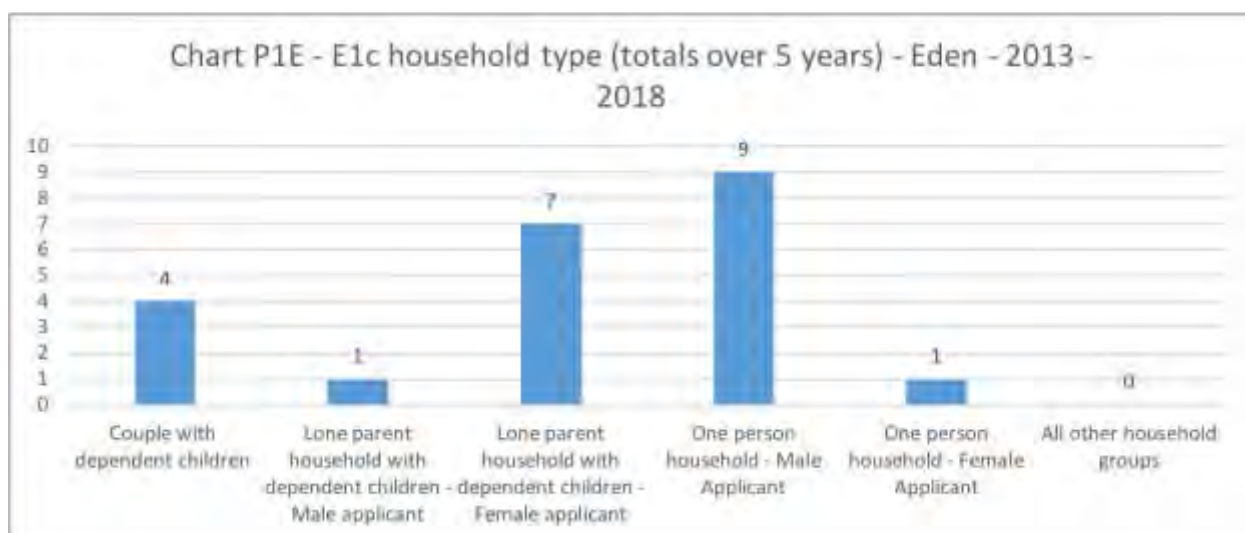
Source: Eden District Council. P1E.

Over the five-year period, one-person male households made up the majority (41%) of all households found to be eligible, unintentionally homeless and in priority need. Female one parent households with dependent children represented 32% and 18% couples with dependent children.

One-person female households and male lone parent households with dependent children made up the fewest numbers over the last five years.



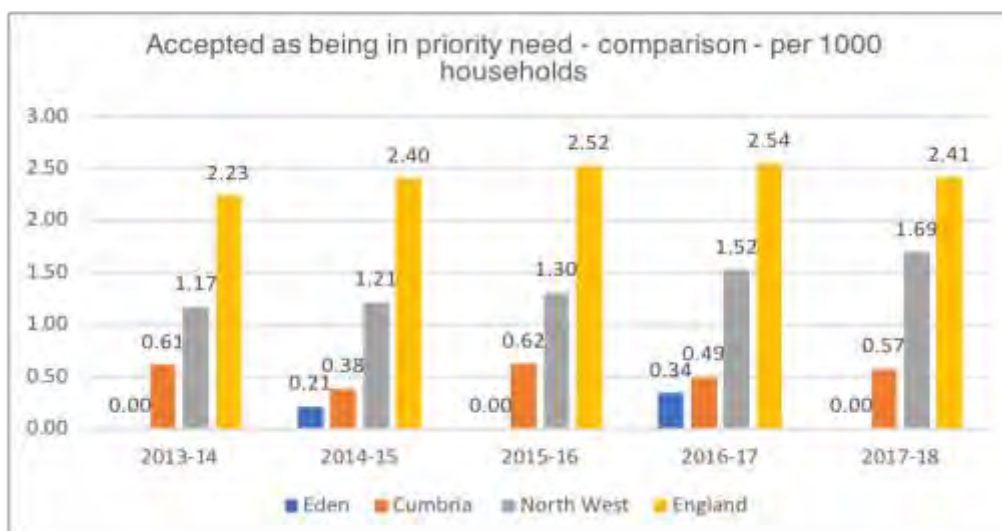
Source: Eden District Council. P1E.



Source: Eden District Council. P1E.

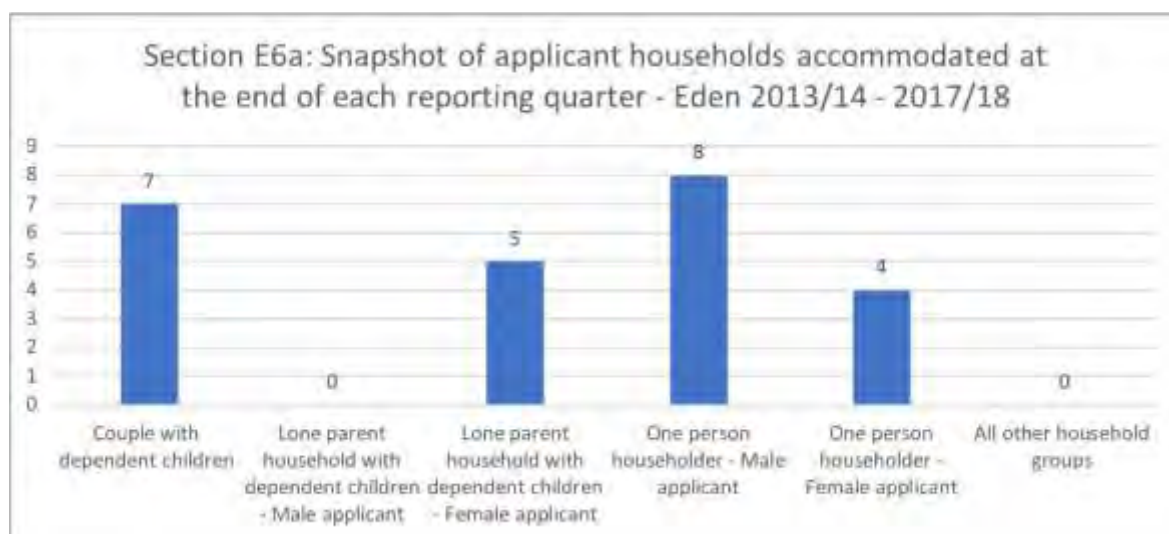
Contextual understanding of homelessness levels in Eden, can be gained from comparing key trends by per 1000 households. For the purpose of this report, Eden has been benchmarked alongside the combined total for all six local housing authorities in Cumbria, all 39 local housing authorities in the North West England, plus all 326 local housing authorities in England.

Between 2013–2018 Eden recorded an average of 0.1 per 1000 households accepted as being homeless and in priority need, 80% lower compared to Cumbria, 93% lower than the North West and 96% lower compared to England.



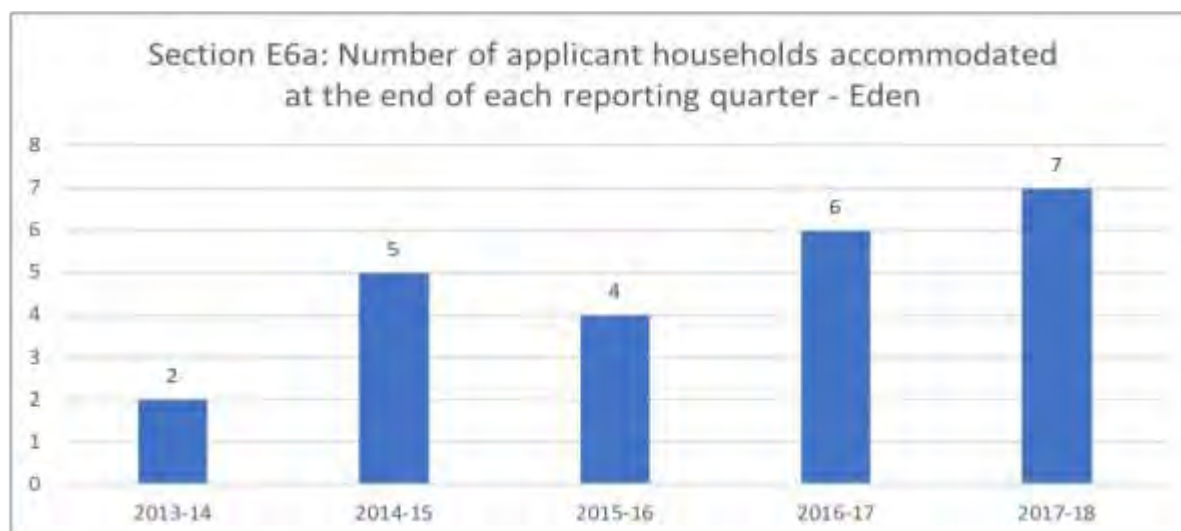
Source: Ministry of Communities and Local Government. Homelessness Live Table 784.

Over the past five years, a total of 24 households were recorded as placed in temporary accommodation by Eden Housing Association, one-person male households made up the majority (33%) of all households. Couples with dependent children represented 29%.



Source: Eden District Council. P1E.

The number of households placed in temporary accommodation is low however there has been a steady increase over the five-year period with a 75% increase over the last three years.



Source: Eden District Council. P1E.

Across Cumbria numbers have remained consistent, elsewhere levels of temporary accommodation usage increased by 148% across the North West, and 31% across England.



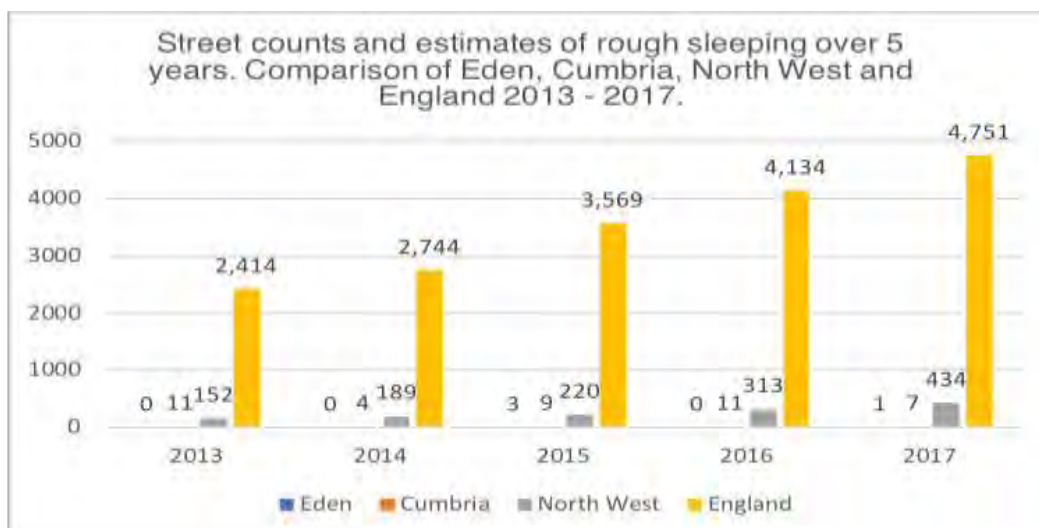
Source: Eden District Council. P1E.

An evaluation of the levels of rough sleeping is carried out annually in Eden District Council, in accordance with national guidance⁴⁴.

The levels of rough sleeping in Eden has remained consistently low with no recorded rough sleepers for 3 of the 5 years, the exception is 2015 and 2017 recording a total of 4 persons as sleeping rough on any given night. Of the identified rough sleepers, 2 were accommodated in social housing and contact was lost with 2.

Elsewhere in Cumbria, the average levels of rough sleeping have remained consistent between 2013–2017. By comparison the North West and England recorded a 186% and 97% increase in the number of rough sleepers respectively.

⁴⁴ Department for Communities and Local Government. (2010). Evaluating the extend of rough sleeping: A new approach.



Source: Ministry of Communities and Local Government. Homelessness Live Rough Sleeping.

2.2 Future levels of homelessness

Research⁴⁵ published in 2017 shows the primary cause of homelessness to be childhood poverty. This is closely followed by labour and housing market factors as secondary causes.

To forecast future levels of homelessness, we have taken account of trends shown in homelessness statistics analysed in section 2.1 of this chapter, plus used other sources of data relating to the main causes, to create an as accurate forecast as is possible.

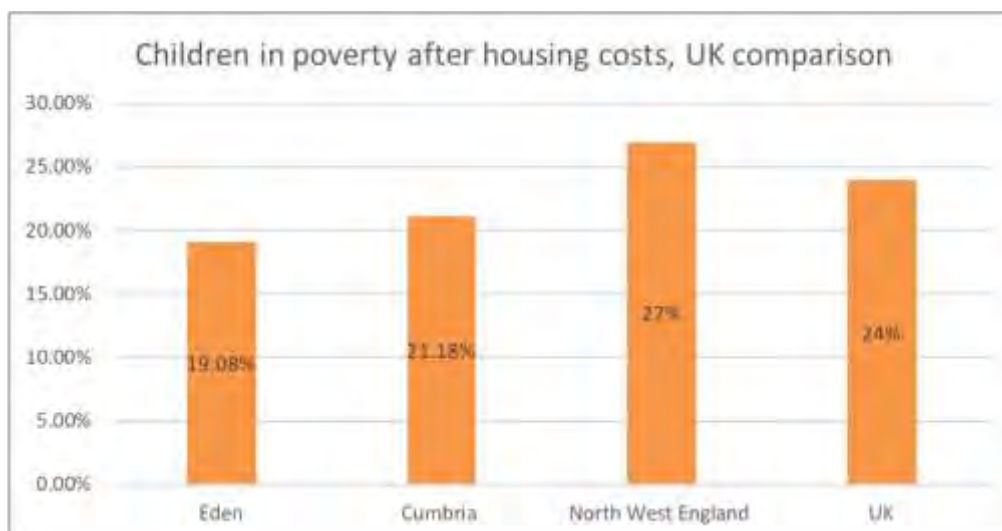
Latest child poverty figures (April 2018) state that in the UK in 2016-2017 there were 4.1 million children living in poverty. Housing and childcare are the two primary factors that have been identified as putting pressure on family budgets⁴⁶. Figures published by the UK Government state that the percentage of children living in poverty increased (1%) from 2015 to 2016 and this put them at the same levels as those seen in 2009/2010. Children are more likely, compared to the overall population, to be living in low income households⁴⁷.

Child poverty rates in the Eden district are lower than Cumbria (by two percentage points) and lower than the North West and the UK, by just under 8 and 5 percentage points respectively.

⁴⁵ Professor Glen Bramley and Professor Suzanne Fitzpatrick (July 2017), 'Homelessness in the UK: who is most at risk', Housing Studies Journal, pp1-21

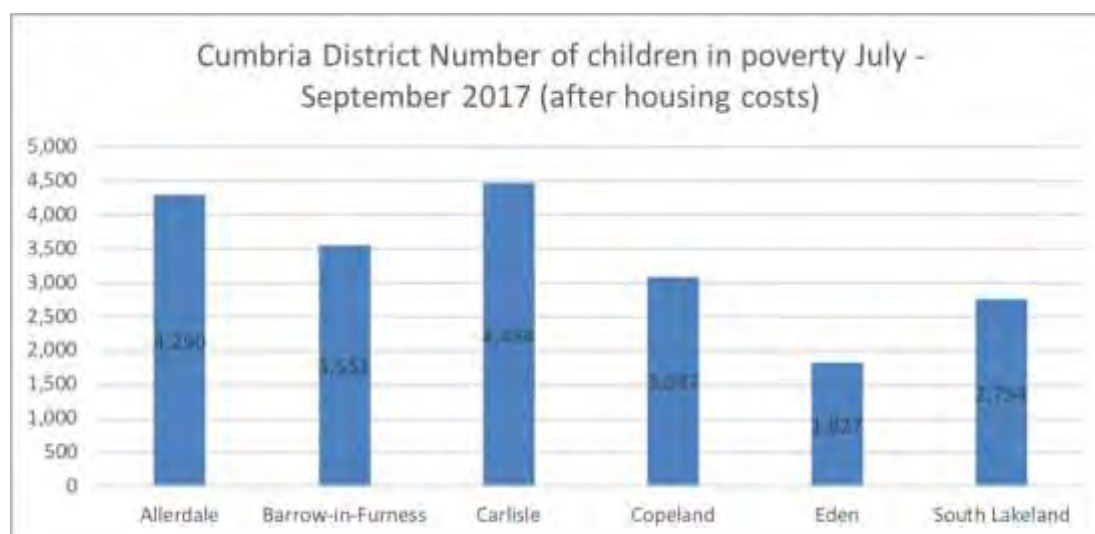
⁴⁶ <http://www.cpag.org.uk/content/child-poverty-facts-and-figures>

⁴⁷ <https://www.nomisweb.co.uk>

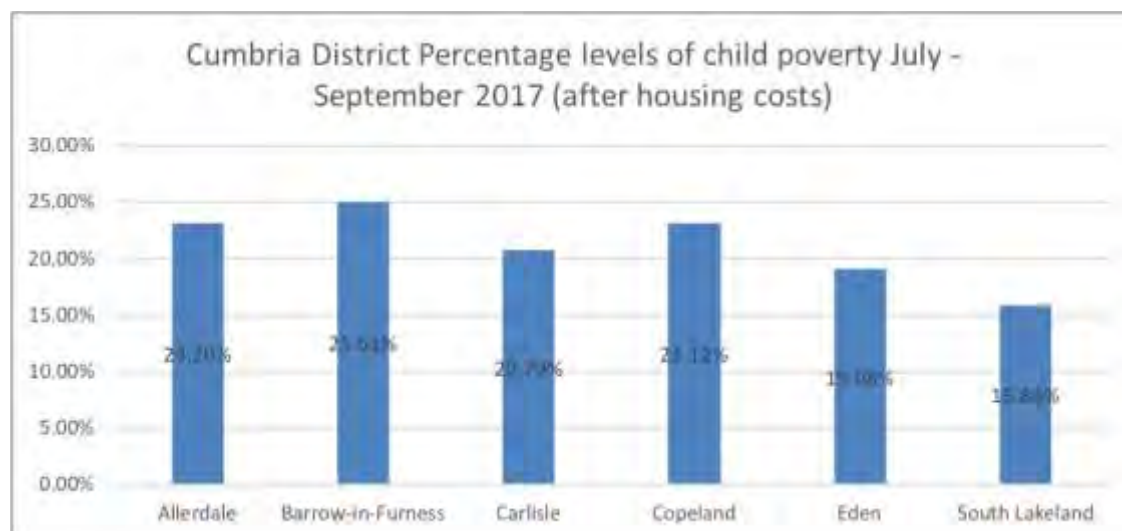


Source: Child Poverty Action Group. End Child Poverty

The number of children in poverty in Eden (after housing costs are deducted) is the lowest in Cumbria. This is 51% lower than South Lakeland, the area with the second lowest levels, and 144% lower than Carlisle, the area with the highest levels. In relative terms, child poverty levels in the Eden district are the second lowest levels in Cumbria. This is 17% higher than South Lakeland, the area with the lowest rate of child poverty, but 31% lower than Barrow-in-Furness, the area with the highest rate of child poverty.

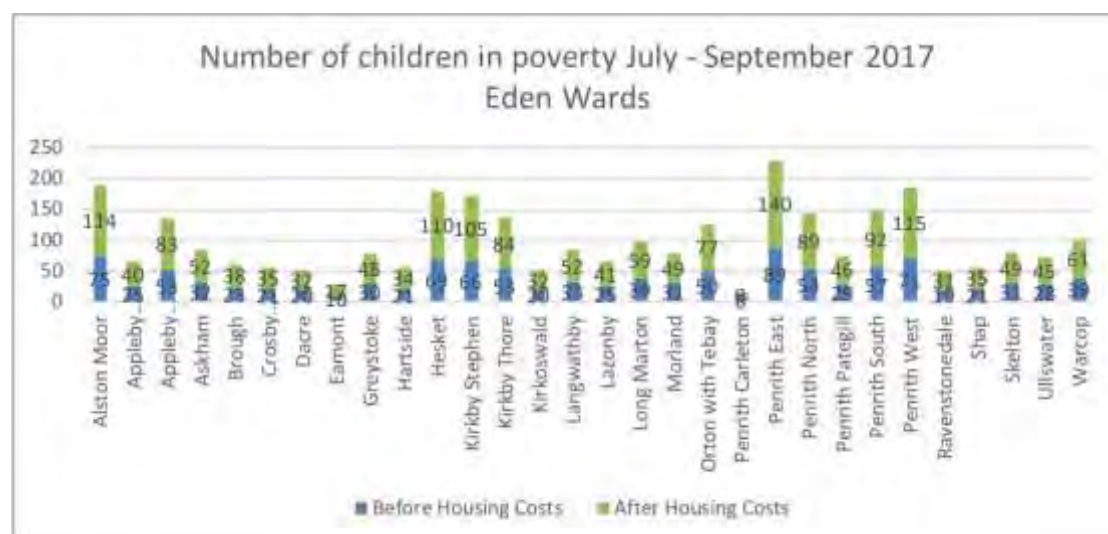


Source: Child Poverty Action Group. End Child Poverty



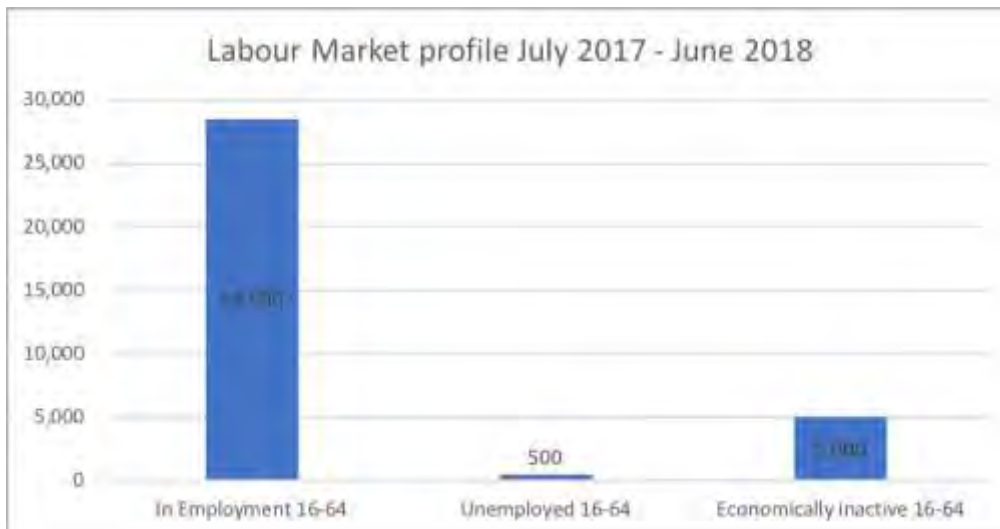
Source: Child Poverty Action Group. End Child Poverty

At a local level, before housing costs are deducted, a total of 1,140 children (11.9%) living throughout the 30 Wards in Eden were identified as living in child poverty. This number increases to 1,827 (19.08%) when housing costs are included, an increase of 687 (60%). Penrith East is the electoral ward with the highest child poverty rates at 89 (15.41%) before housing costs increasing to 140 (24.38%) when housing costs are added. There is a higher concentration of child poverty levels in the electoral wards of Penrith West, Alston Moor, Hesket and Kirkby Thore.



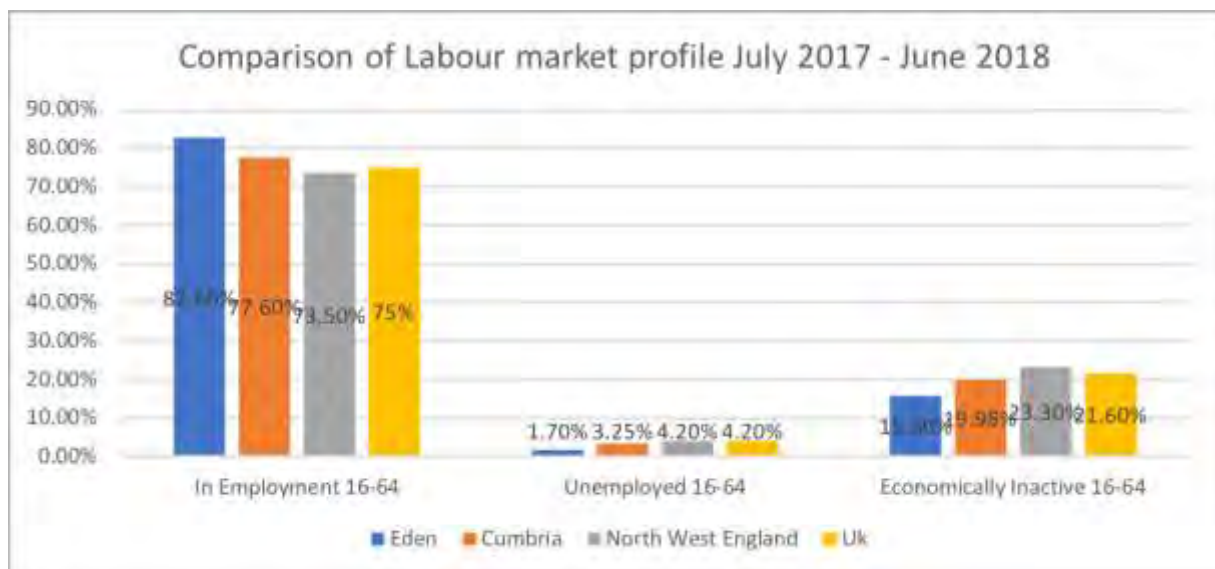
Source: Child Poverty Action Group. End Child Poverty.

Eden has a resident population of 52,800 of which 30,900 (58.5%) are aged between 16-64 years. 29,000 (84.2%) of 16-64-year olds are recorded as economically active, 28,500 (82.6%) of which are in employment. 500 (1.7%) are unemployed. A total of 5,000 (15.8%) of 16-64-year olds are recorded as economically inactive, of which 2,500 (50%) was due to retirement. 94.6% of this group are recorded as not wanting a job.



Source: Office for National Statistics. Nomis: Official Labour Market Statistics.

The percentage of 16-64-year-olds in employment in Eden is 5% higher compared with Cumbria, 9% and 7.6% higher compared with the North West and the UK. Unemployment figures are 1.5% lower than Cumbria and 2.5% lower than the North West, and the UK. The percentage of 16-64-year-olds recorded as economically inactive is 4%, 8% and 6% lower respectively compared with Cumbria, the North West and the UK.



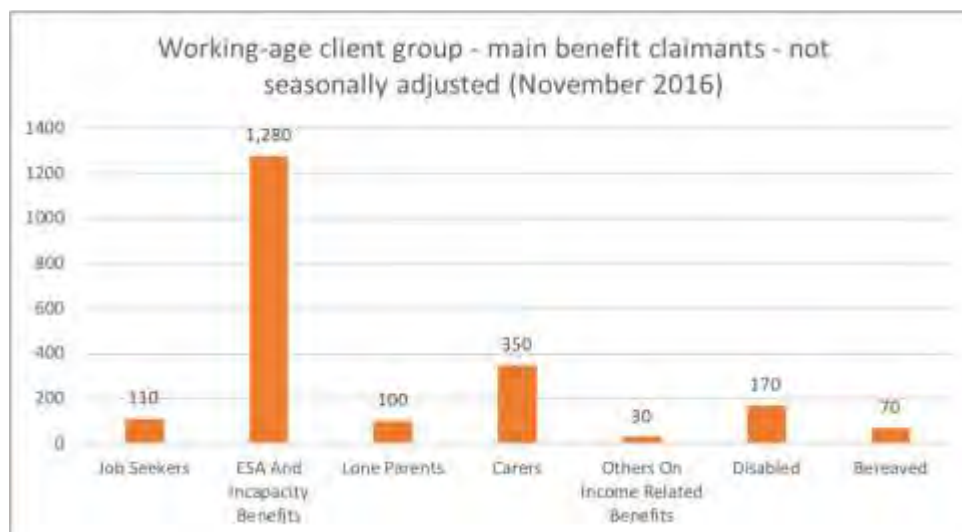
Source: Office for National Statistics. Nomis: Official Labour Market Statistics.

Gross weekly pay is on average 6.7%, 1.9% and 10% lower respectively compared with Cumbria, the North West England and the UK.



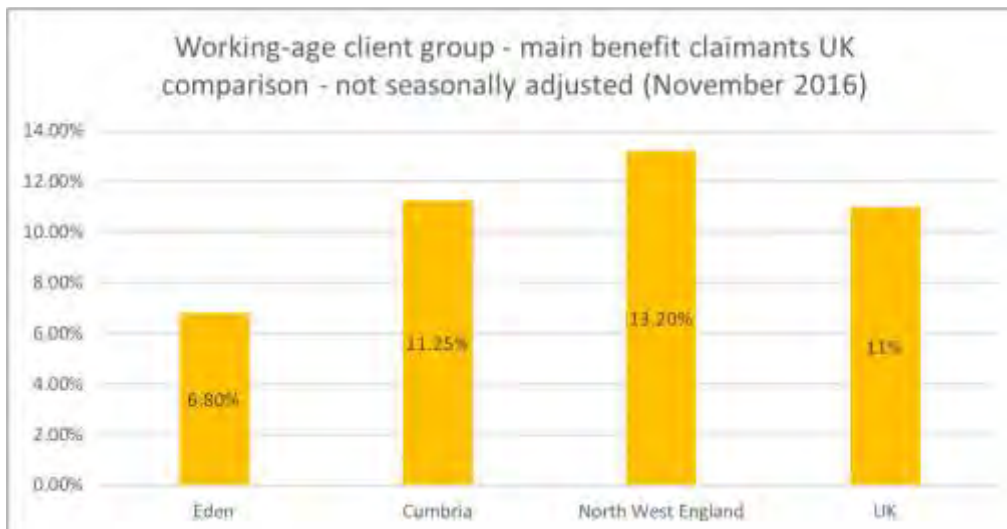
Source: Office for National Statistics. Nomis: Official Labour Market Statistics.

ESA and Incapacity benefits make up 60% of all benefit claims, with 6.8% of the Eden population aged 16-64 claiming. Comparatively, this is 6.4% and 4.2% lower than the North West and UK numbers. Out of work benefits make up 72% of all benefit claims, with 4.9% of the Eden population aged 16-64 claiming, again in comparison 5.2% and 3.5%, this is lower than the North West and the UK.



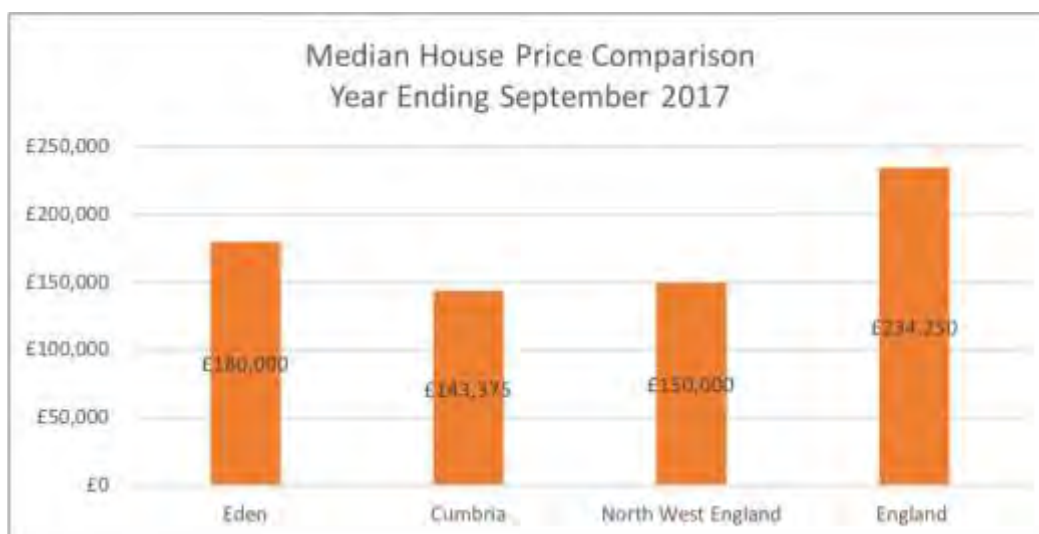
Source: Office for National Statistics. Nomis: Official Labour Market Statistics

With 6.8% of the Eden population aged 16-64 in receipt of benefit, the local area is 4.5%, 6.4% and 4.2% lower respectively in the number of residents in receipt of benefit compared with Cumbria, the North West and the UK.



Source: Office for National Statistics. Nomis: Official Labour Market Statistics

Median house prices in Eden are 25% and 20% higher compared to Cumbria and North West England. House prices in England are on average 30% higher than compared to Eden. Between 2016 and 2017 average house prices in Eden have decreased by 2.8%, Cumbria the North West and England have increased by 3.2%, 11.1% and 6.7% respectively.



Source: Office for National Statistics. Nomis: Official Labour Market Statistics

Median gross annual earnings in Eden are equal to Cumbria, 5% and 7% lower compared to the North West and England. Between 2016 and 2017 Eden recorded a 1.4% increase in average earnings compared with a 0.7% increase in Cumbria and the North West, England recorded a 3% increase. Comparing the 5 years between 2012 and 2017, earnings in Eden have decreased by 10%, Cumbria has remained static and the North West and England increased by 6% and 5%.



Source: Office for National Statistics. Nomis: Official Labour Market Statistics

A ratio of 7.49 times median gross annual earnings for Eden, is 16% and 33% above average compared with Cumbria and the North West and 20% lower compared with England.

Between 2016 and 2017 the Eden house price earnings ratio fell by 4.0% compared to an increase of 2% regionally (North West) and 1.6% in England.

Comparing the 5 years between 2012 and 2017 the house price to earnings ratio for both Eden and England increased by 15.9%, house price to earnings in Cumbria increased by 9.3%.

Analysis of data between year ending 2013 and 2017 shows an average annual increase across both local and national regions of 7.4% - 8.5%.



Source: Office for National Statistics. Nomis: Official Labour Market Statistics

2.3 Conclusions about the levels of homelessness

More could be done with data held by local and national public authorities to identify people likely to be at risk of any form of homelessness by, for example, characteristic and/or electoral ward area. Interrogation of such data, held by the local authority, voluntary organisations and others, would help to inform the design and delivery activities for preventing homelessness, securing accommodation and providing support.

Levels of homelessness in Eden has reduced over the past five years reflecting an overall reduction in homeless decisions seen across five of the six Cumbrian districts. The number of households in Eden accepted as being homeless and in priority need is significantly lower compared to Cumbria, the North West and England. The levels of temporary accommodation in Eden has increased, however this remains relatively low compared to elsewhere, with a total of 24 households placed in temporary accommodation over the past five years.

Half of people making an application for assistance are found to be eligible but not homeless (within the legal meaning of the term). The dominant characteristics of people applying for assistance are persons aged 25-44 years of age, of a white ethnic origin, who are a single male. Although the age and ethnicity of this profile is reflective of national trends, the statistics don't reveal why Eden has a number of statutory homeless single males. However the high rate of acceptances for this group could explain why the levels of rough sleeping is very low.

Low rates of child poverty and high levels of employment will have a positive impact on the levels of homelessness. House prices and earnings are less favourable in Eden compared other areas, this is likely to have a greater impact on younger and single households, as their income levels and borrowing potential are typically lower than two-person and family households. These factors will have some negative causative effect on the levels of homelessness.

Taking account of the current levels of homelessness, alongside a range of predictive factors, the levels of homelessness in Eden are forecast to increase, albeit at a lower rate than across Cumbria, the North West and England. The expected increase will primarily be due to health-related factors such as relationship breakdown, mental illness, and substance misuse. A secondary driver for this predicted increase, is prevailing housing market factors plus the lower than typical levels of earnings.

3.0 Preventing homelessness

The chapter considers activities to prevent homelessness, in Eden and compares these activities regionally and nationally.

Homelessness prevention activity has been divided into three recognised strands⁴⁸ to inform the focus of this review:

1. Early prevention – those most at risk are identified and services provided to prevent problems escalating
2. Pre-crisis prevention – advice services, mediation or negotiation with landlords to avoid the imminent loss of a home
3. Preventing recurring homelessness – tenancy sustainment services are provided to address other support needs

It has been a policy of MHCLG for more than a decade to encourage local housing authorities to prevent homelessness⁴⁹. All Councils with homelessness functions are obliged to provide housing advice, free of charge, to anyone in their area (regardless of the form of homelessness a person might be experiencing), on what can be done to prevent homelessness⁵⁰. This advice must extend to explaining the rights of people when they are homeless, securing accommodation when homeless, help available when homeless and how to access it. Many early homelessness prevention activities focus on those most at risk of homelessness. Homelessness legislation⁵¹ recognises characteristics and circumstances when a person has a heightened risk of homelessness:

- Leaving prison or youth detention accommodation
- Leaving care of a children services authority
- Regular armed forces veterans
- Victims of domestic abuse
- Leaving hospital
- Being mentally ill

The above list isn't intended to be exhaustive, with many other persons having a heightened risk of homelessness, for example due to being a young adult, a victim of violence or sexual abuse, a victim of harassment, having a drug or alcohol addiction, being a victim of trafficking, or possessing any of the characteristics protected under the Equality Act 2010.

⁴⁸ Hal Pawson, Gina Netto, Colin Jones, Fiona Wager, Cathie Fancy, Delia Lomax (2007), *Evaluating Homelessness Prevention*, London, Department for Communities & Local Government

⁴⁹ Office of the Deputy Prime Minister (2005), *Sustainable Communities: settled homes, changing lives*, London, UK Government

⁵⁰ Housing Act 1996 (amended by the Homelessness Reduction Act 2017), Part 7 section 179

⁵¹ Housing Act 1996 (as amended) Part 7 section 179(2)

Homelessness legislation⁵² requires local housing authorities to help people who are threatened with homelessness in order to prevent them from becoming homeless. Previously, the assistance provided to a person at risk of homelessness was limited to 28 days prior to losing their home. Furthermore, the type of assistance provided would vary depending on whether someone had a priority need for accommodation, or if they were intentionally homeless. Since April 2018, following the commencement of the HRA17, all persons threatened with homelessness are entitled to the assistance for up to 56 days⁵³. To inform the assistance provided, local authorities are now obliged to complete an assessment with persons applying for help⁵⁴. The conclusions are then taken forward to formulate a personalised plan, to aid them in securing accommodation and support to resolve the causes of their homelessness.

A new 'duty to refer' came into force from October 2018⁵⁵. Specified public authorities are obliged to ask any person they believe might be homeless or threatened with homelessness, if they wish to be referred to a local authority of their own choosing.

3.1 Early homelessness prevention activities

3.1.1 Universal homelessness prevention activities

Eden District Council have made information available to relevant public bodies, such as Cumbria County Council (CuCC) and local NHS Trusts, about to make referrals of cases of homelessness. A dedicated online referral form is available on Eden District Council's website, plus a specific email address has been set-up. Training has been carried out with key stakeholders, to help them understand how the duty to refer affects them and the people that use their services. From October 2018 to March 2019, there has been 52 referrals, of which 17% have come from public authorities that have a duty to make a referral, a further 75% have come from housing associations. Almost all housing associations that hold stock in Eden have signed up to the National Housing Federation's voluntary Commitment to Refer⁵⁶, including:

- Castle and Coasts Housing Association;
- Impact Housing Association;
- Home Group;
- The Riverside Group;
- Housing and Care 21;
- Mitre Housing Association;
- Places for People Group.

The prevention of homelessness often starts with good housing advice. Eden District Council has contracted out the administration of some homelessness functions (along with those pertaining to the allocation of social rented housing) to Eden Housing

⁵² Housing Act 1996, Part 7, sections 195 - 196

⁵³ Housing Act 1996, (as amended), Part 7, section 195 Duties in cases of threatened homelessness

⁵⁴ Housing Act 1996, (as amended), Part 7, section 189A Assessments and personalised plans

⁵⁵ Homelessness (Review Procedure Etc) Regulations 2018, Part 4 Duty to Refer

⁵⁶ National Housing Federation. (2018). Commitment to refer: guidance for housing associations

Association, a social landlord formed following a large-scale voluntary transfer of council housing from Eden District Council. The responsibilities performed by Eden Housing Association include:

- Providing Housing advice,
- Taking applications for homelessness assistance,
- Determining eligibility for assistance,
- Providing accommodation for an interim period to people who might be homeless, eligible for assistance and have a priority need,
- Completing assessments and formulating personalised plans,
- Fulfilling duties to prevent and/or relieve homelessness, provide accommodation to people who are unintentionally homeless and have a priority need, plus provide advice and accommodation for a reasonable period to people who are intentionally homeless and have a priority need,
- Making referrals to other local authorities for persons who do not have a connection to Eden,
- Completing reviews of decisions made about entitlements to assistance,
- Ensuring suitability of accommodation offered, protection of persons property, working with children services when cases involve children, receiving referrals from specified public authorities, and
- Detecting fraudulent applications for assistance.

Eden District Council retains legal culpability for all decisions made about entitlements to homelessness assistance (and also in respect of housing allocation), in addition to matters such as:

- Awarding funding to voluntary organisations, for schemes to tackle homelessness,
- Responding to requests for assistance from other local authorities to discharge their homelessness duties, and
- Completing a homelessness review and formulating a homelessness strategy.

Eden Housing Association delivers the homelessness functions from their main offices, located in Penrith, five days per week, during typical office hours. At all other times an out-of-hours on-call system is in operation. Eden Housing Association's website has a specific homelessness tab which is easily identifiable on its homepage. The dedicated homelessness page includes details about how to access the service, plus information about:

- Specific emergency protocol that comes into force during periods of severe weather,
- Efforts being made to ensure nobody sleeping rough has to spend a second night out, and
- Dedicated support for victims of domestic abuse.

Additionally, the website has links to an array of documents offering the public useful information on preventing the main causes of homelessness (eg parental eviction), specific advice for those most at risk of homelessness (eg people leaving the care of children services), and initiatives that can prevent homelessness (eg landlord incentives that can assist to secure private rented sector (PRS) accommodation). Alongside this are facts about people's rights to assistance when homeless.

Eden Housing Association's homelessness service has undergone transformation, alongside the introduction of the HRA17. Expansion of prevention activities, procurement of additional temporary and more staff (including a dedicated manager post), have all been put in place. Further details about the latter two matters are explored later in this review, chapter 4 (Temporary Accommodation) and chapter 5 (Resources).

Eden District Council also offers a range of information about homelessness. Along with signposting to Eden Housing Association, advice is available on the duty to refer, specific facts for refugees, gypsies and travellers and asylum seekers. There is also details about rights to make an application for homelessness assistance, provision of temporary accommodation and entitlements to seek a review of a homelessness decision. Eden District Council website actively solicits feedback from visitors, including those looking at the homelessness specific pages.

Cumbria Law Centre (CLC) is a voluntary organisation, formed in 1990, whose operations cover the district of Eden along with the rest of the county. CLC provides legal advice to people who cannot afford to pay for it, this includes operating a housing possession court duty scheme (further details are provided section 3.2 of this chapter). Eden District Council (and separately Eden Housing Association) award funding to CLC, to assist with housing rights issues, including reviews and appeals of homelessness decisions. There is no data available from CLC about homelessness prevention casework outcomes.

Carlisle and Eden Citizens Advice (CECA) is a voluntary organisation, with two offices, one of which is located in Penrith. A drop-in service operates 10:00 hours to 15:30 hours, three days per week (Monday, Tuesday and Thursday). In addition to this, advice is available via self-help, telephone, email webchat, and video link. Matters dealt with include money, welfare benefits, energy along with a vast range of other topics that include housing rights and options. There is no data available from CECA about homelessness prevention casework outcomes.

Carlisle Key is a voluntary organisation that was formed in 1997. The charity operates a week-day drop-in service from their offices in Carlisle city centre, between 12:30 – 15:30 hours, for young people aged 16-25 years who are homeless or risk of homelessness. The organisation will be piloting a weekly three-hour drop-in service, from March 2019, in Penrith from the Citizens Advice centre. Advice on housing, money, welfare benefits employment and other matters will be available for young people under 25 years of age.

3.1.2 Targeted homelessness prevention activities

There is no statistical monitoring specific to Eden about the number of people leaving prison, young offender institutes, etc who are homeless at the date of release. Eden Housing Association has published a comprehensive leaflet about homeless

when leaving prison. Any person with unspent convictions can be excluded from Cumbria Choice⁵⁷. Persons with a history of offending are not afforded any preference for available lettings. There is no data available on the number of applications from, and allocations made to people with a history of offending. There are no specific accommodation or support services in Eden, for people with a history of offending to prevent them from becoming homeless. Carlisle and Eden Community Safety Partnership⁵⁸ (CECSP) has responsibility for devising and delivering a strategy to tackle offending behaviour in the local authority area. Membership of the Partnership includes Eden District Council, CCC, Cumbria Constabulary, Cumbria and Lancashire Community Rehabilitation Company, plus others. Violent crime, anti-social behaviour and reducing re-offending are three of the five priorities adopted by CECSP. As needed, an officer from Eden Housing Association's Homelessness Service attend the Multi-Agency Public Protection Arrangement meetings. There is a joint working protocol in place between Eden District Council (and other Cumbrian local housing authorities), and the Cumbria and Lancashire Community Rehabilitation Service, in relation to people being supervised in the community who may need advice and/or assistance about homelessness.

There is no statistical monitoring specific to Eden about of the number of people leaving local authority care who become homelessness. Eden Housing Association has published a comprehensive leaflet about homeless when leaving local authority care. CuCC works alongside Eden Housing Association to assist children aged 16 or 17 years, plus young adults aged 18, 19, or 20 years, each fulfilling any relevant duty owed. CuCC facilitate the organisation of a personal adviser for each person leaving care, to provide support until their twenty-first birthday (or twenty-fifth if they remain in full time education). Cumbria Choice deems care leavers to have a high housing need, placing them into the second highest band for a housing allocation. There is no data available on the number of applications from, and allocations made to people with a history of living in local authority care. CuCC are responsible for making and delivering the strategy for looked after children. A draft plan⁵⁹ is currently being formulated, to cover 2019–2023. One of seven priorities is to help looked after children and care leavers to prepare for adulthood and independent living. CuCC have established a comprehensive protocol with Eden District Council/ Eden Housing Association, to enable successful joint working between all councils in respect of young people leaving care⁶⁰. The protocol clearly explains the assistance CuCC's children services will provide care leavers. There is also substantial information on how Eden District Council and other housing services will collaborate and compliment the work of CuCC. This includes:

- joint casework between Eden District Council/Eden Housing Association and CuCC for 16/17-year old care leavers,
- Eden Housing Association providing advice to 15/16-year olds who are preparing to leave care,
- Pre-tenancy learning certificate, and

⁵⁷ Cumbria Choice Partnership. (2016). Housing Allocation Policy

⁵⁸ [Carlisle and Eden Community Safety Partnership Action Plan](#)

⁵⁹ Cumbria County Council. (2019). Cumbria children looked after strategy 2019-23

⁶⁰ Cumbria County Council. (2018). Care leavers protocol: Eden

- A range of supported accommodation for young people, which includes a foyer and supported lodgings (see chapter five of this review).

There is no statistical monitoring specific to Eden about the number of armed forces veterans who become homeless. Eden Housing Association has published a comprehensive leaflet for ex-armed forces personnel who are at risk of homelessness. Home Group housing association have a designated armed forces accommodation in Cumbria, although located outside district of Eden, in Maryport. Cumbria Choice deems veterans with medical problems to have an urgent housing need, placing them into the highest band for a housing allocation, with those having been in the forces within the past five years deemed to have a medium housing need, placing them into the third highest band for a housing allocation. Data on the number of allocations made to armed forces veterans shows 14 of the 229 (6%) offers accepted in 2018/2019 were individual/joint applicants who had served in the armed forces. The number of accepted offers has increased by 140% over the last 4 years from 5 in 2015 to 14 in 2018/2019. Eden District Council (alongside Carlisle City Council (CaCC) and potentially others) are jointly funding a new armed forces community support hub and outreach pilot. Hosted by Cumbria Voluntary Service, the three-year project will provide support to ex-service personnel and their families in Eden, plus Carlisle. This initiative has potential to provide specific homelessness prevention activities to veterans.

Statistics specific to Eden about the number of people who become homeless due to domestic abuse are available. Homelessness data collected by Eden Housing Association, on behalf of Eden District Council shows, the main reason for homelessness is due to violence breakdown of relationship, accounting for about 40% of all homelessness acceptances in a typical year (see chapter 5 for more information). National homelessness prevention statistics show that installation of a sanctuary scheme is used in about 6% of homelessness prevention cases, however local homelessness data show this approach isn't being used in Eden (see section 3.2 of this chapter for further information). Eden Housing Association has published a comprehensive leaflet for victims of domestic abuse who are at risk of homelessness. Cumbria Choice deems victims of domestic abuse as having an urgent housing need, placing them in the highest band for a housing allocation. There is no data available on the number of applications from and allocations made to people who are victims of domestic abuse. CECSP has responsibility for devising and overseeing a domestic abuse strategy for the district. Domestic abuse and sexual violence are one of the five priorities adopted by CECSP. Cumbria Domestic Abuse Partnership⁶¹ (CDAP) is a consortium of local authorities, other public authorities, and voluntary organisations, which includes Eden District Council and Eden Housing Association, helping to meet local priorities for tackling domestic abuse. Founded in 2016, CDAP operates across the whole of Cumbria, including Eden. Funded by an initial circa £700k revenue grant awarded by MHCLG, CDAP coordinates preventative and crisis response support, as well as an accommodation service for victims of domestic abuse. As needed, an officer from Eden Housing Association's Homelessness Service attend the Multi-Agency Risk Assessment Conferences, to reduce the risk of domestic abuse.

There is no statistical monitoring specific to Eden about the number of people being discharged from hospital who become homeless. Eden Housing

⁶¹ <https://www.carlisle.gov.uk/Residents/Housing-and-Homeless/Cumbria-Domestic-Abuse-Partnership>

Association has published a leaflet for people who are homeless after leaving hospital. Cumbria Choice deems people needing to be discharged from hospital to have an urgent housing need, placing them into the highest band for a housing allocation. There is no data available on the number of applications from and allocations made to people who were homeless at discharge from hospital. There are no specific accommodation or support services in Eden to prevent homelessness at the point of discharge from hospital.

There is no statistical monitoring specific to Eden about the number of people with mental ill health who are homeless. Eden Housing Association has published a leaflet for people who are suffering with a mental illness or impairment and are homeless. Cumbria Choice deems people who have severe mental ill health to have an urgent housing need, placing them into the highest band for a housing allocation. There is no data available on the number of applications from and allocations made to people who were homeless and mentally ill. There are no specific accommodation or support services in Eden to help homeless mentally ill people.

The extent and prevalence of homelessness prevention activities for other persons likely to become homeless are unclear. There are no apparent specific homelessness prevention initiatives to respond to the common characteristics of adults who experience homelessness, such as alcohol dependency, street drinking, use of hard drugs, begging, injecting drugs, being charged with a violent criminal offence, abuse of solvents/gas/glue, engaging in sex work, being a victim of a sexual assault⁶². Policy making around these matters are either jointly or separately, the role of public health and/or community safety officials. Their efforts to prevent homelessness are either not captured properly, are unknown, or possibly nothing is in place.

3.2 Pre-crisis homelessness prevention activities

Pre-crisis homelessness prevention activities are primarily carried out by Eden Housing Association's Homelessness Service. MHCLG's homelessness statistical recording from 2009/2010⁶³ (until 2017/2018, following which recording methods were changed), detailed pre-crisis homelessness prevention activities typically carried out throughout England as shown below:

⁶² Professor Suzanne Fitzpatrick, Dr Sarah Johnsen, Dr Michael White (2011), 'Multiple Exclusion Homelessness in the UK: Key Patterns and Intersections', *Social Policy and Society*, 10(4), p501-512

⁶³ Department for Communities and Local Government. (2009). Recording homelessness prevention and relief at E10 of the P1E quarterly return: Further guidance for local housing authorities.

Homelessness Prevention Activities to Remain in Existing Home

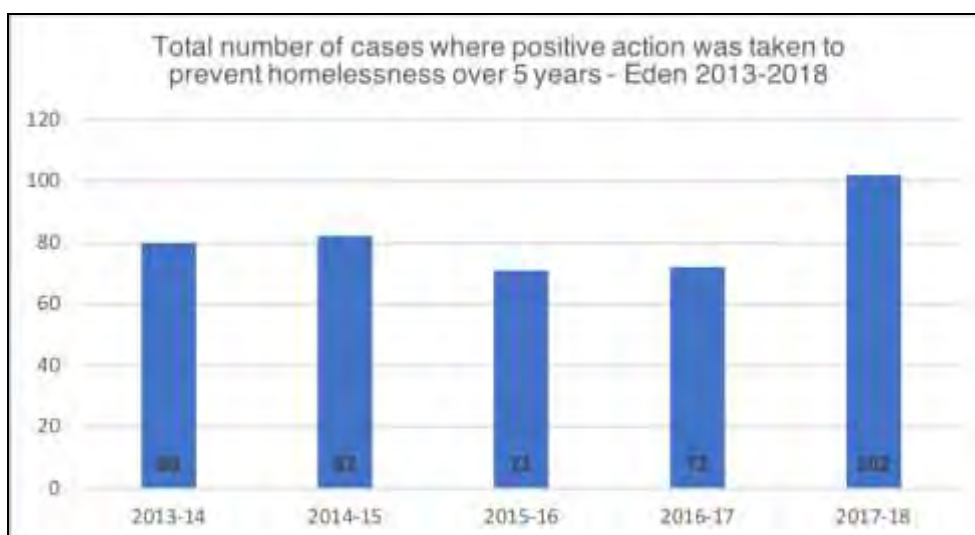
Mediation using external or internal trained family mediators
Conciliation including home visits for family/friends threatened exclusion
Financial payments from a homelessness prevention fund
Debt advice
Resolving housing benefit problems
Resolving rent or service charge arrears in the social or private rented sectors
Sanctuary scheme measures for domestic violence
Crisis intervention – providing emergency support
Negotiation or legal advocacy to ensure someone can remain in accommodation in the private rented sector
Providing other assistance that will enable someone to remain in the private rented sector
Mortgage arrears interventions or mortgage rescue

Homelessness Prevention Activities to Obtain Alternative Accommodation

Any form of hostel or house of multiple occupation with or without support
Private rented sector accommodation with landlord incentive scheme
Private rented sector accommodation without landlord incentive scheme
Accommodation arranged with friends or relatives
Supported housing, including supported lodging schemes
Management move of an existing social housing tenant
Housing register offer or nomination of accommodation to a social landlord
Negotiation with an RSL outside housing register or nomination arrangements
Low cost homeownership scheme or low-cost market housing solution

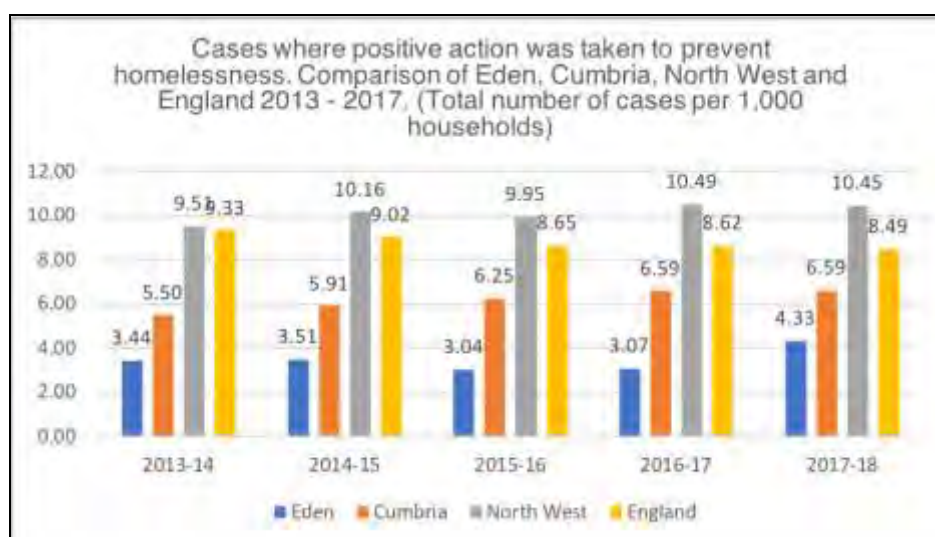
Pre-crisis homelessness prevention activities can be divided into two broad areas: assistance that helps people to remain in their existing accommodation or, when this is not safe or possible, help to obtain alternative accommodation. These activities are typically carried out anytime between one day before a person might become homeless, and up to two months prior to someone potentially losing their home, and occasionally even further ahead in time.

Between 2013 and 2017, an average of 76 cases were recorded of positive action taken by Eden Housing Association, on behalf of Eden District Council, to prevent homelessness, the number of cases increased by 34% in 2017-18 to 102 cases.



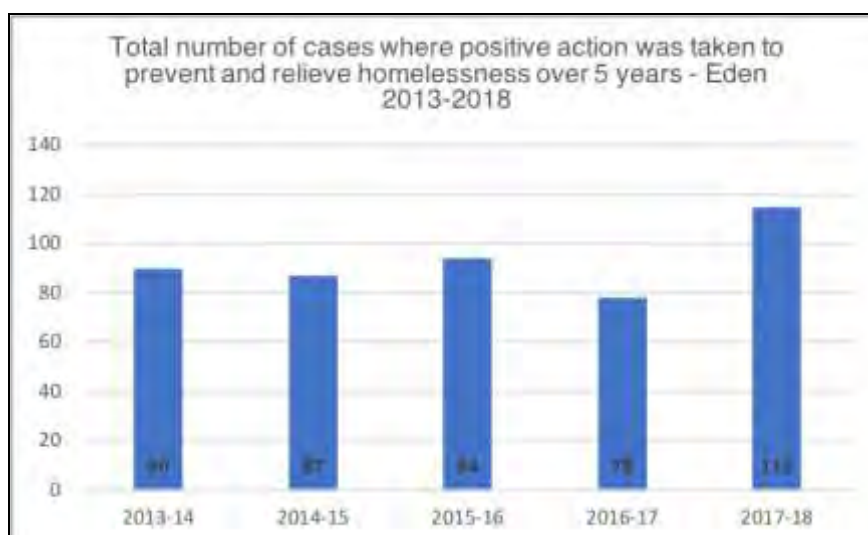
Source: Eden District Council. P1E.

The number of cases recording positive action taken across 6 Cumbria rose steadily by 20% between 2013 and 2017 and remained at the same in 2016–2018. The North West numbers remained consistent throughout the five-year period and England recorded a steady 6% reduction.



Source: Ministry of Communities and Local Government. Homelessness Statistics Live Table 792.

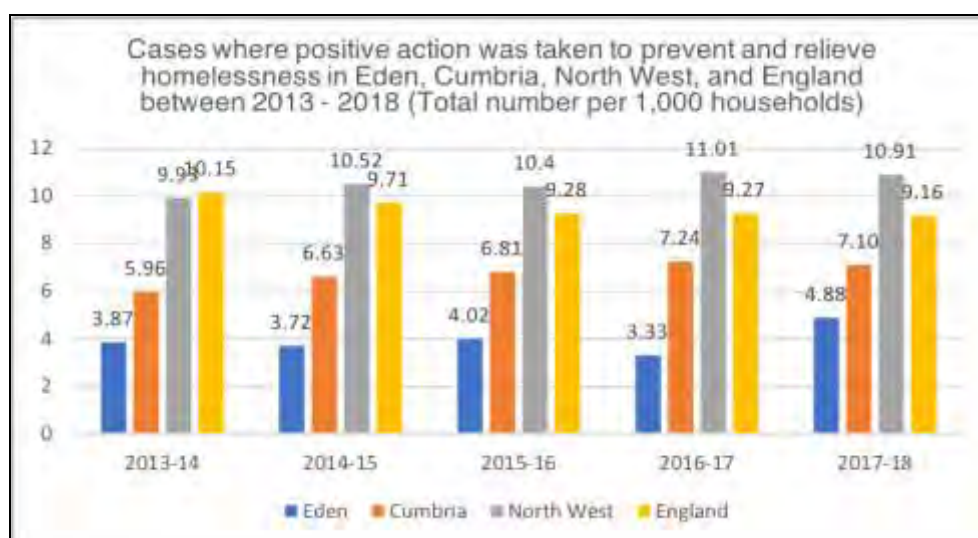
Between 2013 and 2018, an average of 93 cases each year were recorded of positive action taken by Eden Council to prevent and relieve homelessness. The number of cases recorded rose by 48% in 2017-2018 compared to the previous year.



Source: Eden District Council. P1E.

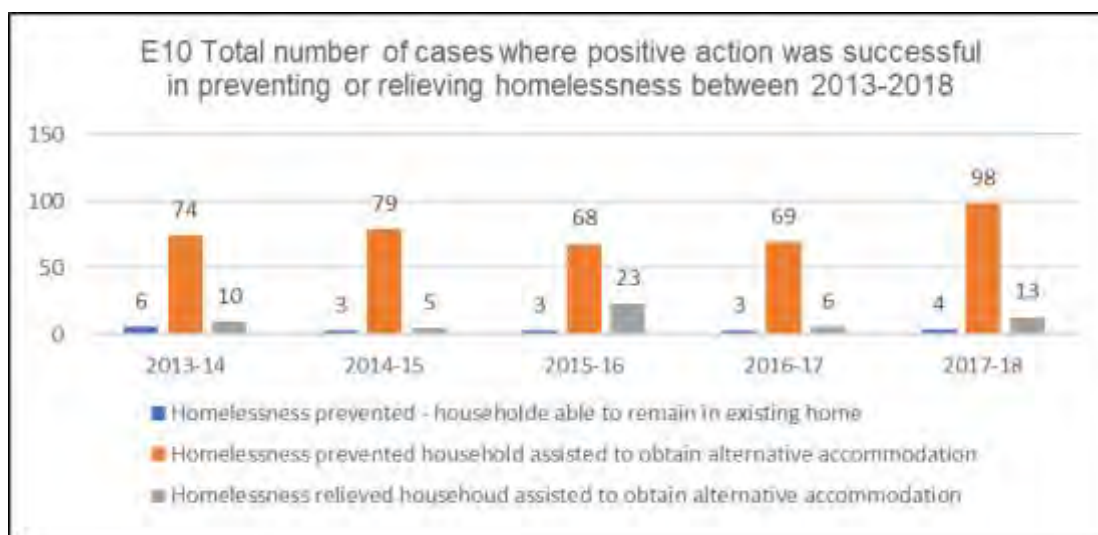
The number of cases recording positive action taken to prevent and relieve homelessness across Cumbria averaged 7 cases per 1,000 households, numbers recorded showed a 19% increase in cases over the five-year period.

The North West and England numbers remained consistent throughout the five-year period averaging 11 cases and 9.5 per 1,000 household respectively.



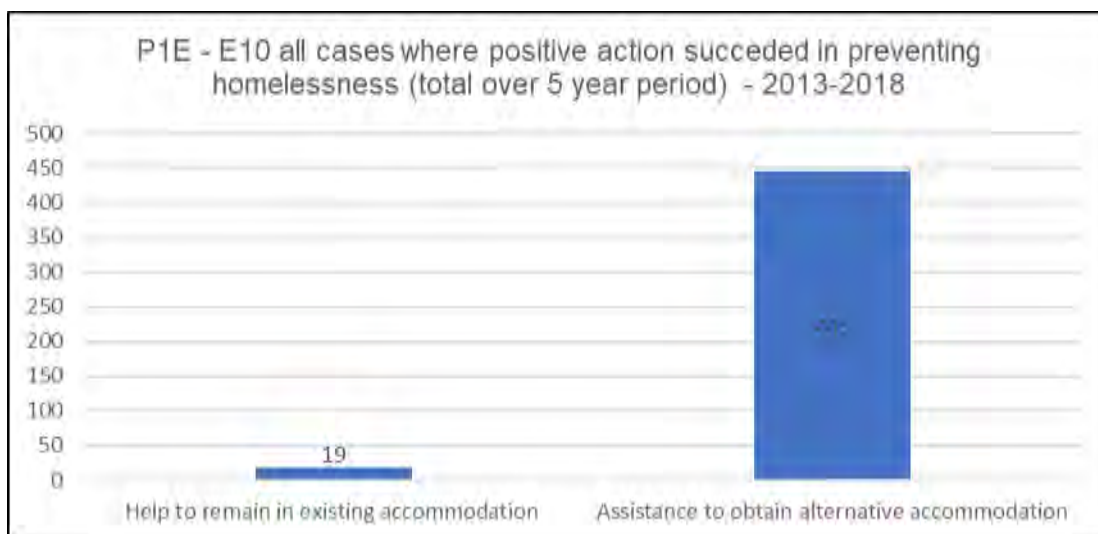
Source: Ministry of Communities and Local Government. Homelessness Statistics Live Table 792.

Between 2013 and 2018, more households were assisted to obtain alternative accommodation, than were helped to remain in existing accommodation. During the five-year period, the number of people being assisted to obtain alternative accommodation dropped slightly in 2016-2017 but saw an overall increase of 32%. Whereas, the number of people being helped to remain in existing accommodation saw a 60% reduction.



Source: Eden District Council. P1E.

Overall, during the past five years, 4% of people were helped to remain in their existing accommodation, compared to 96% of people who were assisted to obtain alternative accommodation. Nationally there is almost an equal split between the two methods.

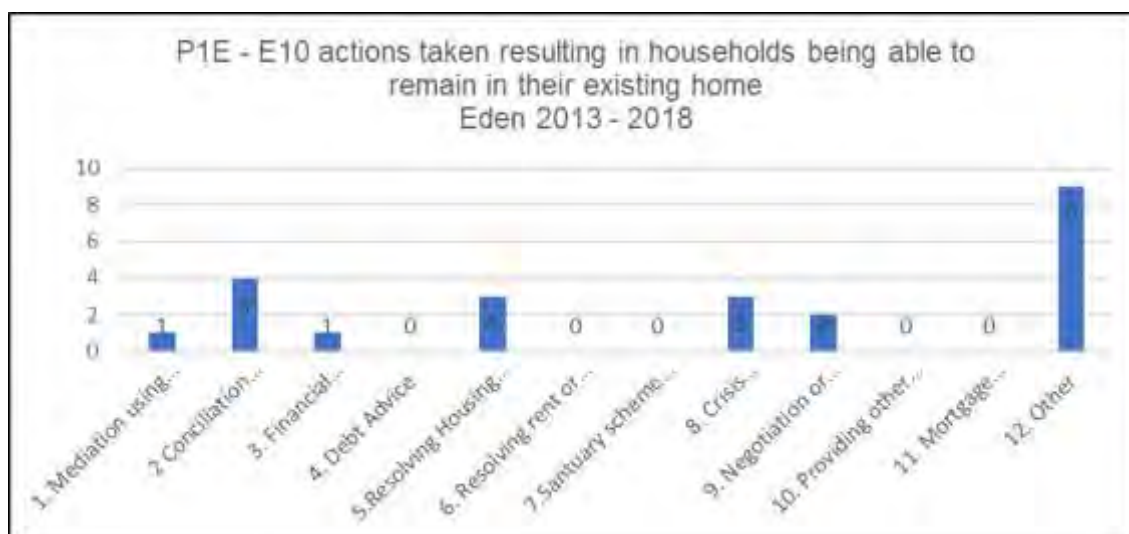


Source: Eden District Council. P1E.

'Other' methods were recorded as the most common help given, with 8 of the 19 (42%), residents helped to stay in their home recorded this way. Conciliation including home visits for family/friend threatened exclusions was recorded as the second highest method used to ensure households remained in their existing home, with 21% of casework interventions recorded under this heading.

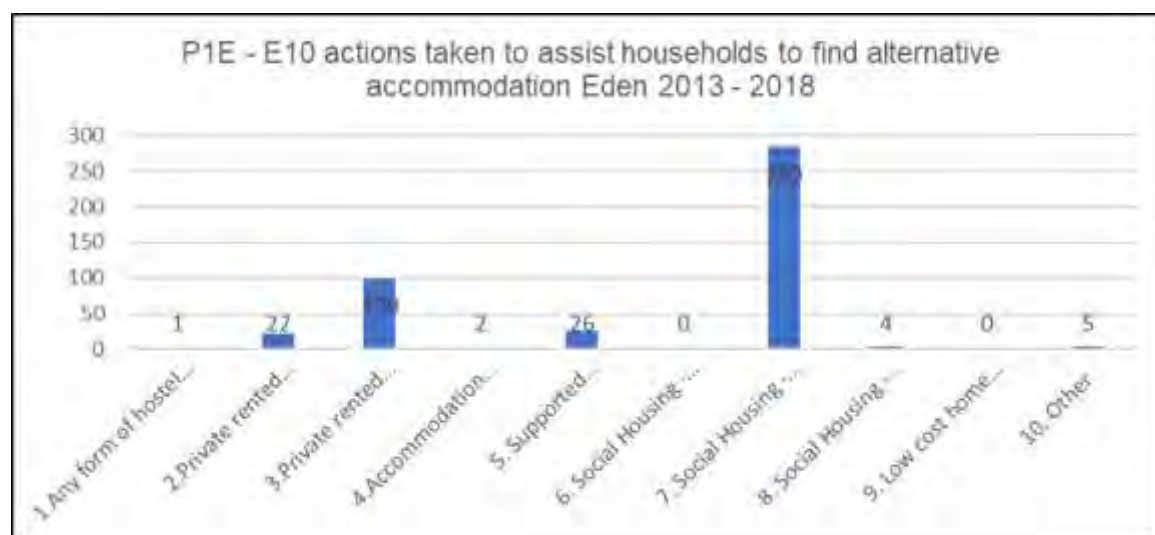
10% of cases were resolved through resolving housing benefit problems and crisis intervention providing emergency support. A minority (5%) of cases were resolved through mediation, financial payments, negotiation or legal advocacy to ensure that someone can remain in accommodation in the private rented sector.

Nationally, the most common activities carried out to help people remain in existing accommodation are resolving housing benefit problems (13% of all casework), PRS assistance (10%), and debt advice (6%).



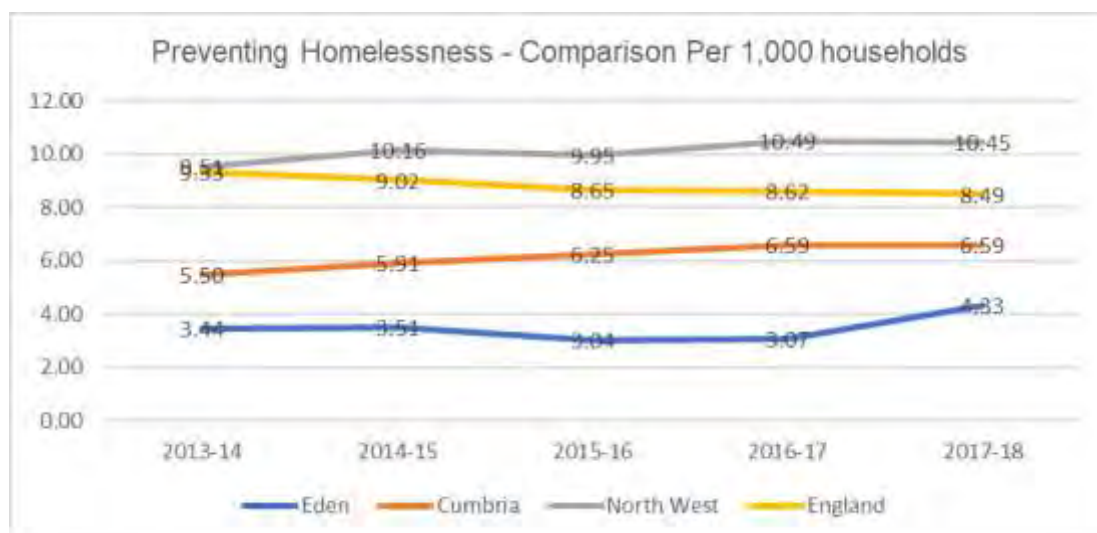
Source: Eden District Council. P1E.

Action taken to assist households in finding alternative accommodation, focused around securing social housing through a part 6 offer with 64% of people being accommodated this way. 22% of cases were resolved through assisting households to find a PRS tenancy (without the use of a landlord incentive), 6% accessed supported accommodation, 5% secured PRS housing with a landlord incentive scheme.



Source: Eden District Council. P1E.

The rate of homelessness prevention casework is lower in Eden than Cumbria, North West and England. Compared to Eden, the rates of prevention casework activity was 52%, 96%, and 141% higher across Cumbria the North West and England.



Source: Ministry of Communities and Local Government. Homelessness Statistics Live Table 792.

Eden District Council affords Eden Housing Association a budget to pay-off rent arrears, where this disqualifies a person from Cumbria Choice. This debt is often split three ways, with housing associations writing-off some of debt and the individual agreeing to pay the remaining portion of arrears. Eden Housing Association also provide funding for rental deposits, spot-purchasing of mediation where parents, other relatives or friends are unwilling or unable to accommodate a person, who as a result is at risk of homeless. This funding is also used to purchase security enhancements for victims of domestic abuse.

3.3 Preventing the reoccurrence of homelessness

Prevention of the reoccurrence of homelessness is typically carried out by a mixture of public authorities and voluntary organisations. This might involve providing information, advice and assistance about economic, social, housing, or legal matters. There is variable local verifiable statistical evidence on the volume of activity being carried out, and varying outcomes being achieved. There is plenty of anecdotal material that has been considered as part of this review. An in-depth evaluation of this can be found in chapter 5 of this document. Section 5 reviews the activities being carried out to support people at risk, who are, or have been homeless.

3.4 Conclusions about activities to prevent homelessness

The extension of duties owed to persons who are threatened with homelessness from April 2018, means that the local authority now must ensure there are a comprehensive range of activities in place to prevent homelessness. An improved system of evidencing outcomes from homelessness prevention activities needs to be put in place. Efforts made by public authorities and voluntary organisations all need to be recognised. Policies, procedures, process charts and paperwork templates for the whole array of prevention schemes, will all need to be reviewed and updated as required post enactment of the Homelessness Reduction Act 2017.

Eden District Council's decision to contract out the administration of its homelessness functions, has resulted in a strong service offer from Eden Housing Association. There is a natural alignment between Eden Housing Association's core business of being a provider social housing (for both rent and sale), and delivering housing

advice services, as both activities are about making sure that everyone can get their housing needs met. Eden Housing Association have started collecting information on customer satisfaction for persons using the homelessness service, and the Council carries out telephone interviews of previous service users to gauge the quality, effectiveness and value of the service being provided. Consideration should be given to the homelessness service being provided from its own distinct housing advice centre, off-site from Eden Housing Association's main office. For a district the size of Eden, there is a good array of housing advice services, delivered by a range of organisations, offering efficient service. It is difficult to determine if there is any duplication between local service providers. A lack of evidence about the effectiveness of homelessness prevention action from housing advice providers hinders making future policy decisions.

Efforts to improve homelessness prevention activities for people leaving secure estates should be encouraged. Sufficient time and commitment must be made by both Eden District Council and national criminal justice agencies to establish a pathway that guarantees nobody leaves prison to no fixed abode. Eden District Council and CCC provide a range of homelessness prevention activities for people leaving care, these practices and protocols are very good. A pilot project Eden District Council is jointly funding, has potential to prevent homelessness for armed forces personnel. Preventing homelessness prior to discharge from hospital should comply with practices promoted by the Department of Health, a short-life joint working group should be established between the local authority housing services and local NHS bodies to transform local procedures. Activities to tackle homelessness due to domestic abuse are excellent, logically this will be having a positive impact on the number of victims who become homeless or threatened with homelessness. However, there is little read across from the community safety plan and the extended duty to prevent homelessness. Outcomes achieved from domestic abuse commissioned services should be shared where relevant with those responsible for the forthcoming new local homelessness strategy. Activities to prevent vulnerable adults from becoming homeless need to be developed between Eden District Council and CuCC, with better links being made between duties arising from the Care Act 2014 and Homelessness Reduction Act 2017. Specific interventions for those most at risk of homelessness (eg adults experiencing mental ill health) need to be developed, along the lines of those already in place for 16 and 17-year-olds at risk of homelessness. Likewise, activities to prevent other persons more likely to become homeless, such people with a substance dependency, committing criminal offences, or involved in sex work, all need to be developed, with primary responsibility being taken by the CuCC Director of Public Health along with the Cumbria Police and Crime Commissioner, supported by Eden District Council.

Eden District Council/Eden Housing Association is reliant upon a small number of initiatives to carry out pre-crisis homelessness prevention activity. Local prevent rates being lower than the regional or national rate, is consistent with the lower levels of and acceptances, temporary accommodation usage and rough sleeping. Locally, there is a greater emphasis on helping people to obtain alternative accommodation, compared to helping them to remain in existing accommodation, whereas nationally, there are slightly more outcomes being recorded for the former method. This might be due to local housing market factors, but equally this could be due to a lack of sufficient pre-crisis homelessness prevention initiatives.

Conclusions about activities to prevent the reoccurrence of homelessness can be found in section five of this report.

4.0 Securing accommodation

This chapter of the report reviews the activities to help people who are, or may become homeless to secure accommodation. The use of local authority temporary accommodation is first considered, followed by the wider range of housing options available.

Homelessness legislation⁶⁴ requires that local housing authorities must provide accommodation for an interim period when a person has an apparent priority need for accommodation. The law⁶⁵ defines persons who have a priority need accommodation as:

- Children aged 16 and 17 years;
- Young adults aged 18-20 years, previously in care aged 16 or 17 years;
- Pregnant women;
- Adults with whom dependent children reside;
- Adults whose homelessness was caused by an emergency (eg fire, flood, etc);
- Adults vulnerable due to:
 - Age,
 - Mental illness or disability,
 - Aged 21 years or over, previously being in care,
 - Formerly being in the armed forces,
 - Being discharged from prison, and
 - Fleeing domestic abuse.

The HRA17 introduced a new duty on local housing authorities to relieve homelessness⁶⁶. Local housing authorities must help anyone who is eligible for assistance who is homeless, regardless of whether they might have a priority for accommodation, and irrespective of whether they have become intentionally homeless. For up to 56 days, local housing authorities must help people to obtain suitable accommodation. Typically, this will be from a private landlord or a housing association.

Homelessness law⁶⁷ also stipulates that local housing authorities must provide people who become intentionally homeless but have a priority need for accommodation, with temporary accommodation for a reasonable period, so they can obtain their own accommodation. People who are not intentionally homeless and have a priority need for accommodation, must be provided with suitable accommodation

⁶⁴ Housing Act 1996, Part 7, section 188 Interim duty to accommodate in cases of apparent priority need

⁶⁵ Housing Act 1996, Part 7, section 189 Priority need for accommodation

⁶⁶ Housing Act 1996 (as amended), Part 7, section 189B Initial duty owed to all eligible persons who are homeless

⁶⁷ Housing Act 1996, Part 7, section 190 Duties to persons becoming homeless intentionally

on an ongoing basis⁶⁸. A number of circumstances can bring this duty to an end, most commonly, an allocation of social rented housing, or sometimes an offer of private rented sector housing.

All accommodation arranged by a local housing authority must adhere to a suitability criterion⁶⁹. Regulations⁷⁰ stipulate that bed and breakfast accommodation is never suitable for 16 and 17-year-olds, and only suitable for up to 6 weeks when occupied by a pregnant woman or households where dependent children reside. Other household types should only be accommodated in bed and breakfast hotels for the shortest time possible. Accommodation should be within a local housing authority boundary, or if outside of this, as near as possible (except in cases where a person is escaping domestic abuse).

4.1 Temporary accommodation

Eden Housing Association have the following temporary accommodation provision, located in Penrith and Appleby:

- 2x one-bedroom ground floor flats (1 adapted/1 not adapted),
- 1 x two-bedroom ground floor flat
- 1x three-bedroom house.

Eden District Council has recently increased this portfolio, by leasing 2 self-contained properties from My Space Housing and a private landlord.

Eden Housing Association always seek to make best use of their temporary accommodation provision, for example an arrangement made with CuCC adult social care to fund the placement of a person who was not eligible for homelessness assistance.

During the past five years, temporary accommodation usage has increased across England, and the North West but reduced in Cumbria. Comparison of temporary accommodations levels by per 1000 households, show levels have increased by 31% in England and 148% in the North West, however, in Cumbria, levels have fallen by 21%.

⁶⁸ Housing Act 1996, Part 7, section 193 Duty to persons with priority need who are not homeless intentionally

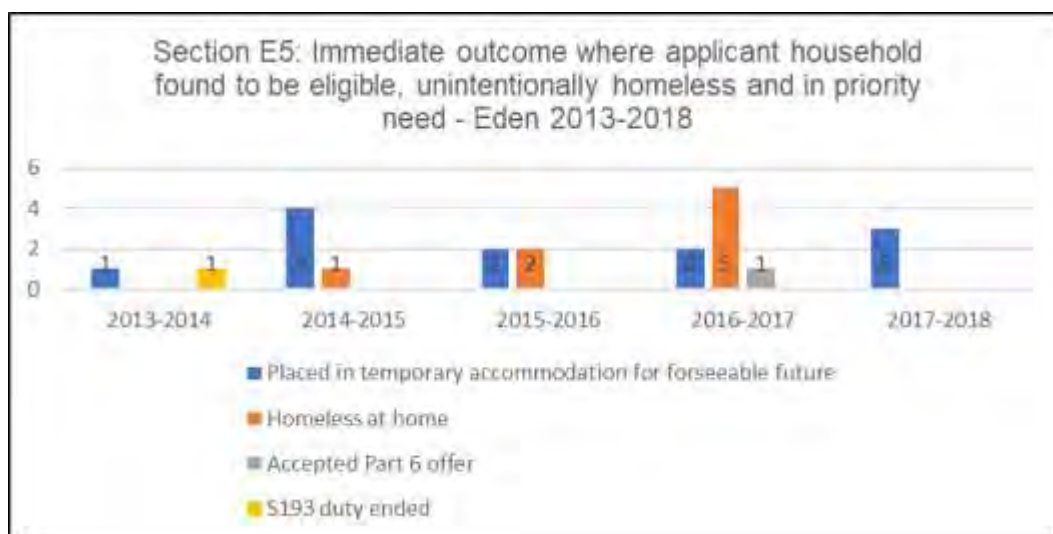
⁶⁹ Homelessness (Suitability of Accommodation) (England) Order 2012

⁷⁰ Homelessness (Suitability of Accommodation) (England) Order 2003



Source: Ministry of Communities and Local Government. Homelessness Live Tables 784.

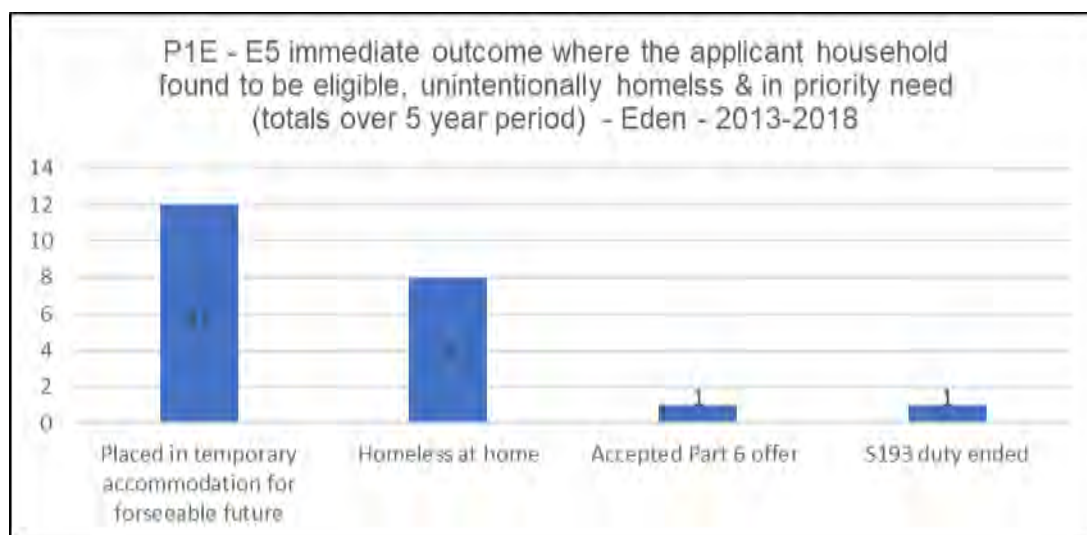
During the past five years, Eden Housing Association has recorded an increase in homeless at home cases by 400% from 1 in 2014/2015 to 5 in 2016/2017. Across the same period of time temporary accommodation levels have reduced by 50% from 4 in 2014/2015 to 2 in 2016/2017 despite which over the five-year period more people were provided with temporary accommodation than remained homeless at home.



Source: Eden District Council. P1E.

P1E statistics from 2013-2018 show that the immediate outcome where the applicant household is found to be eligible, unintentionally homeless and in priority need is that they are placed in temporary accommodation for the foreseeable future (55%) or identified as homeless at home (36%). Accepted a part 6 offer and s193 duty ended⁷¹ account for 9% and several categories were unused⁷².

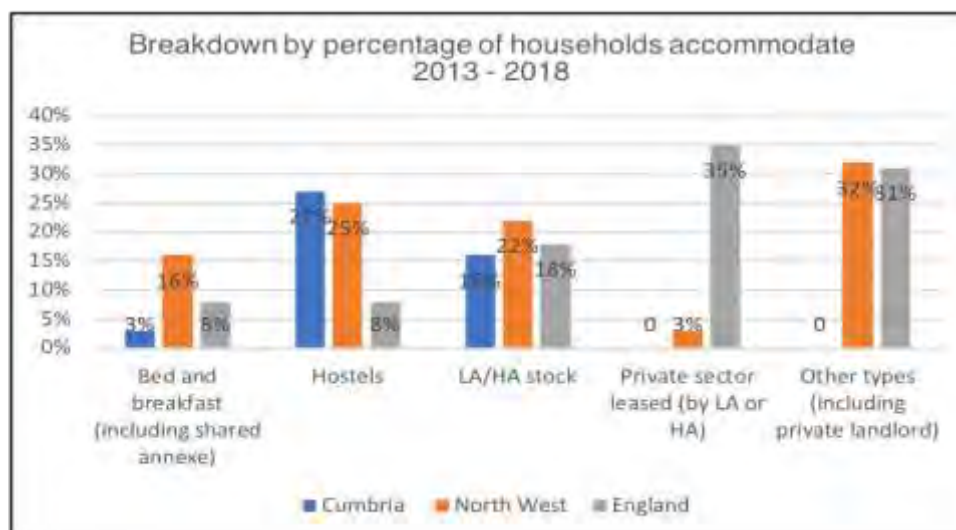
⁷¹ Housing Act 1996, Part 7, section 193 duty to persons with priority need who are not homeless, subsections (5) – (7AA).



Source: Eden District Council. P1E.

Private sector leased accommodation is the most common method used to accommodate homeless households both nationally and locally in Eden. Other types of temporary accommodation remain the most common method used in the North West and the second highest method in England. Cumbria recorded 27% of homeless households placed in Hostel accommodation.

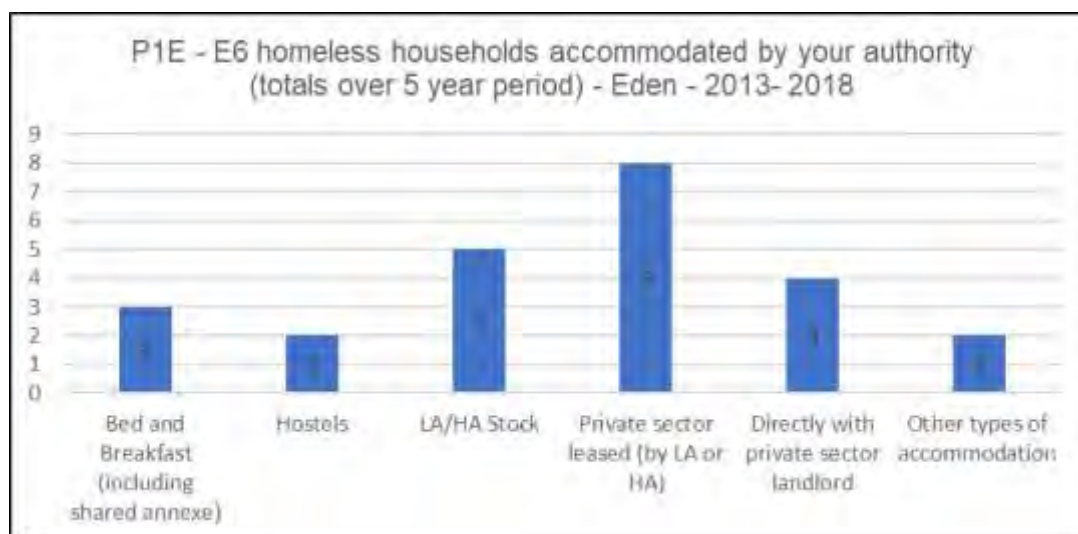
Local authority or housing association stock, taken out from general needs used specifically for use as temporary accommodation, is the third most common form of temporary accommodation nationally, and regionally. This equates to 8% for England and 16% for the North West, Cumbria recorded a 3% use of B&B whereas Eden recorded 12.5% with 3 of the 24 households being placed in B&B over a five-year period.



Source: Ministry of Communities & Local Government. Homelessness Live Tables 784.

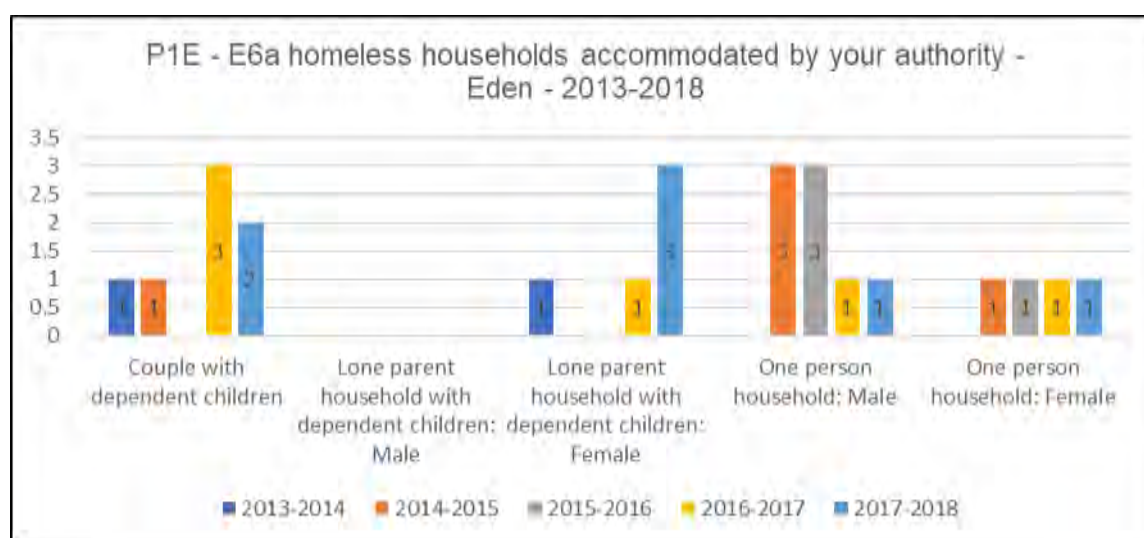
⁷² Accepted qualifying offer of assured shorthold tenancy, duty ended, not ready for immediate occupation, accepted private rented sector offer, Refused private rented sector offer are all categories that have not been used.

Eden Housing Association relied on private sector leased accommodation, LA/HA stock and private sector landlords to accommodate 71% of homeless households over the five-year period.



Source: Eden District Council. P1E.

The type of homeless households most frequently accommodated by Eden Housing Association, are those that consist of male one-person households making up 33% of households accommodated over the past five-years. This household type has however seen a 67% reduction numbers, from 3 in 2014/2015 and 2015/2016 down to 1 in 2016/2017 and 2018/2019. The largest increase by households is female lone parent households with dependent children, up by 200%, from 1 in 2016/2017 to 3 in 2017/2018.

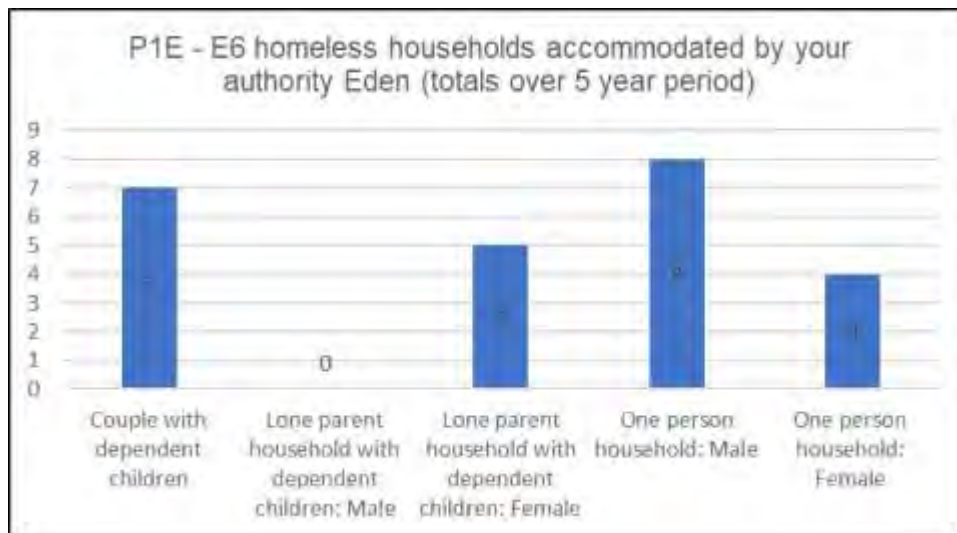


Source: Eden District Council. P1E.

Between 2013-2018, 33% of those accommodated by Eden Housing Association were male one-person households, no male lone parent households with dependent children were accommodated.

The demographics of households provided temporary accommodation by Eden Housing Association are as follows:

- 77.5% women were present, either living with children or alone;
- 50% children were living with couples, or lone male or female parents;
- 50% were either male or female one-person households;
- 29% were couples with dependent children.



Source: Eden District Council. P1E.

Over the five years 8% of households accommodated by Eden Housing Association have been from a black or other minority ethnic origin. Proportionally, this is much higher than the 2% of acceptances that are from black or other minority ethnic origin.

The number of households leaving Eden Housing Association temporary accommodation in under 6 months has fallen by 50% between 2016-2017 and 2017-2018. All recorded households leaving temporary accommodation between 2013 and 2018 had been accommodated for less than 6 months.



Source: Eden District Council. P1E.

All recorded main homelessness duties were ended in under 6 months.

4.2 Other accommodation

4.2.1 Activities to relieve homelessness

Homelessness relief activities are typically carried out by Eden Housing Association's homelessness service, on behalf of Eden District Council. Examples of

Homelessness Relief Activities to Obtain Accommodation

Any form of hostel or house of multiple occupation with or without support
Private rented sector accommodation with landlord incentive scheme
Private rented sector accommodation without landlord incentive scheme
Accommodation arranged with friends or relatives
Supported housing, including supported lodging schemes
Management move of an existing social housing tenant
Housing register offer or nomination of accommodation to a social landlord
Negotiation with an RSL outside housing register or nomination arrangements
Low cost homeownership scheme or low-cost market housing solution

homelessness relief actions, are shown in the box below.

Throughout England, relief casework has historically accounted for 6% of all activity carried out by local authority homelessness services. In Wales, where legislation similar to the Homelessness Reduction Act 2017 has been in force since 2015, the rate is 51% of all casework activity⁷³. Based on the experience of Welsh local authorities, homelessness relief casework could increase by up to one-third following the commencement of the new relief duty.

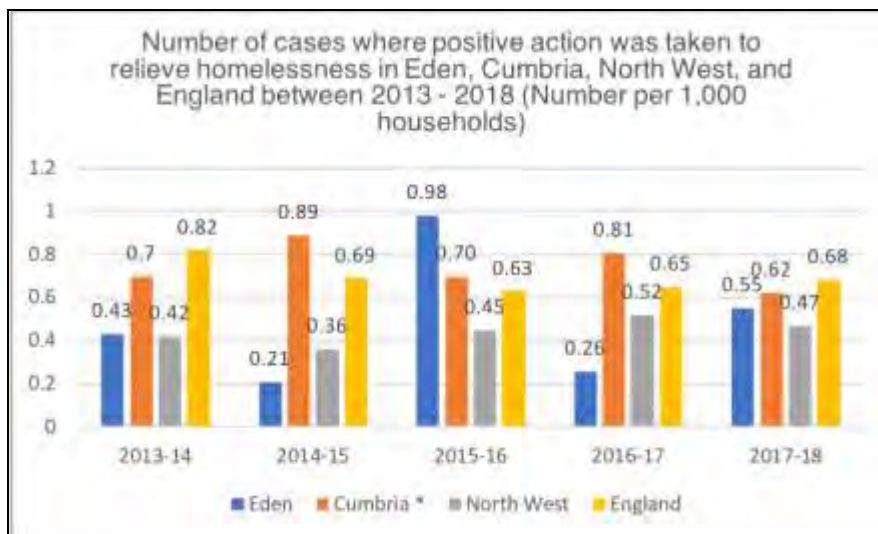
Between 2013 and 2018, an average of 11.4 cases were recorded by Eden Housing Association of positive action taken to relieve homelessness. This figure is distorted by a large increase in 2015-2016, if this year is removed the average reduces to 8.5 cases.

⁷³ <https://statswales.gov.wales/Catalogue/Housing/Homelessness>



Source: Eden District Council. P1E.

The number of cases recording positive action taken to relieve homelessness across Cumbria averaged 0.8 throughout 2013-2017 decreasing to 0.62 in 2017-2018. The North West and England numbers remained consistent throughout the five-year period averaging 0.4 cases and 0.7 respectively.



Source: Ministry of Communities and Local Government. Homelessness Statistics Live Table 792.

There are three common forms of accommodation used to relieve homelessness, locally and nationally: (i) supported housing; (ii) private rented sector accommodation; and (iii) social rented housing. Demand for all types of accommodation exceeds the supply available. These are explored in more detail below.

4.2.2 Housing support

Nationally, hostels or supported housing (including supported lodgings are the most common method of obtaining accommodation to relieve homelessness, totalling 33% of cases of homelessness relief. A detailed analysis of supported housing in Eden can be found in chapter five of this review.

4.2.3 Private rented sector

Nationally, obtaining accommodation in the PRS is the second most common method to relieve homelessness, either with or without use of a landlord incentive, totalling 27% of all cases.

Locally there is no data recorded on number of cases which were relieved by obtaining accommodation via the use of a landlord incentive. Eden District Council have adopted the use of discretionary powers to make a suitable offer of PRS accommodation⁷⁴.

Eden Housing Association work with Eden District Council housing benefit administrators to arrange discretionary housing payments to cover rent in advance and/or rental security deposits.

Eden District Council's most recent Housing Needs Survey (HNS) shows 18.5% of all residential dwellings are private rented or living rent-free⁷⁵. Three quarters of PRS dwelling are houses, with just over two-thirds having two-bedrooms. The majority of people occupying PRS accommodation are single person households, in employment, aged 25-59 years. At around £500 per calendar month, average PRS rents are higher than that of the North West, but lower than of England. Rents had increased at a faster rate than the North West, but slower than of England. PRS rents were less affordable in Penrith compared to Cumbria, the North West and England, with average rents exceeding Local Housing Allowance rates for dwelling with numbers of bedroom. The HNS forecasts that almost three-quarters of future housing (across all tenures) required in Eden are one and two-bedroom dwellings, primarily houses, with just over half being of a rented (both social and private) tenure. Households living in the PRS are more likely to have a housing need than those occupying other tenures.

Eden District Council, jointly with CuCC, published an Empty Homes Strategy, in 2010. The Strategy seeks to support property owners to bring their accommodation back in to use, backed-up by enforcement action if needed. This is accompanied by a policy, directing how financial assistance will be provided, via loans of up to £15k. There are no loans requirements for empty properties brought back in to use, to be let to household who is homeless or threatened with homelessness.

Eden District Council's private sector housing enforcement policy, published in 2009, explains the enforcement action that will be taken to ensure a property is brought up to standard. Eden District Council doesn't operate landlord accreditation scheme, which is used by many other local authorities to promote better housing standards. This type of scheme can also bring other benefits such as improved tenancy sustainment, plus early resolution to landlord and tenant conflict.

4.2.4 Social rented housing

Nationally, a housing register offer or nomination of accommodation to a social landlord, is the third most common method of relieving homelessness, equalling 26% of cases.

⁷⁴ Eden District Council and South Lakeland District Council, Tenancy Strategy 2012 – 2017

⁷⁵ Arc4. (2018). Housing Needs Study 2018. Eden District Council. Penrith

Locally there is no data recorded on number of cases which were relieved by obtaining social rented housing, via an offer made through the local.

Eden District Council's most recent Housing Needs Survey (HNS) shows 11% of all residential dwellings are social rented housing (SRH)⁷⁶. Houses are the main type dwelling, older persons aged over 65 years are the main occupant type. Almost half of occupants are in employment. A majority of dwellings were built prior to 1919. About one-fifth of the dwellings are non-decent. An average of 35 new social housing dwellings have been built annually since 2003/2004, although not all will have been for SRH. Households living in the SRH sector are more likely to have a housing need than people who are owner occupiers, and only slightly less so than individuals occupying PRS accommodation. The area most lacking of social rented housing (to both buy and rent) was in the rural area surrounding Penrith (eg Armathwaite, High/Low Hesket, Kirkby Thore, Langwathby, Lazonby).

Eden District Council, jointly with SLDC, published a Tenancy Strategy, covering the period 2012–2017. The strategy provides housing associations with information on how to implement policies on flexible tenancies and affordable rents. The Tenancy Strategy makes recommendations about vulnerable households, including persons at risk of homelessness. Housing associations are asked to provide an early warning to local housing authority homelessness services, so action can be taken to prevent homelessness, in the following circumstances:

- When a tenancy might not be renewed, or
- When a household does not qualify to succeed a tenancy or have a tenancy assigned to them

Following a large-scale voluntary transfer of its housing accommodation, Eden District Council entered into a common housing allocation scheme, named Cumbria Choice, with the other five Cumbrian local housing authorities, plus with seven housing associations, one of which is Eden Housing Association.

During the past five years, the number of households on local housing authorities' housing waiting lists has reduced locally, sub-regionally, and nationally:

- 18% reduction in Eden, from 1,068 in 2014 down to 1,011 in 2018;
- 29% reduction across Cumbria, from 15,193 in 2014, down to 10,769 in 2018;
- 19% reduction across England, from 1,368,312 in 2014 down to 1,114,477 in 2018.

In 2016, the number of applicants registered on Cumbria Choice, specific to Eden District Council, reduced to 914 households, the second lowest level since current records began in 1997. This was a reduction of 45% compared to the record high of 1,662 in 2005. In the past two years, levels have increased by 9% to 1,011 in 2018.

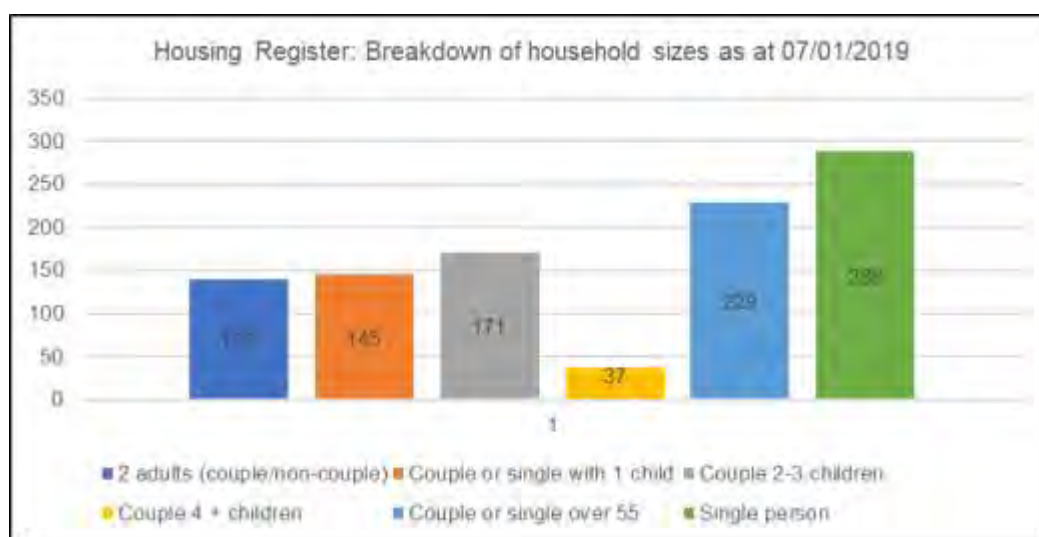
A total of 220 (21%) of Eden's active housing applicants are homeless or threatened with homelessness. 45% of these had been asked to leave their current accommodation, a further 23% were recorded as having had chosen a homeless prevention option, but only 18% had made an application for homeless assistance.

⁷⁶ Arc4. (2018). Housing Needs Study 2018. Eden District Council. Penrith



Source: Cumbria Choice

A snapshot at the 7 January 2019 shows single persons and single/couples over the age of 55 make up 50% of the total number of active housing applicants. Single persons under the age of 55 equate to 28% of all housing applicants.



Source: Cumbria Choice

It's important to note that although Eden District Council has chosen to transfer its housing stock, it cannot absolve itself of the legal responsibility to⁷⁷:

1. Determine which person qualify for an allocation of social rented housing,
2. Have an up-to-date housing allocation scheme,
3. Ensure allocations for social rented housing are made in accordance with the local scheme, and
4. Ensure information about the housing allocation scheme is readily available.

⁷⁷ The Local Authorities (Contracting Out of Allocation of Housing Accommodation and Homelessness Functions) Order 1996. ^[1] ^[SEP]

Separate to its membership of Cumbria Choice, Eden District Council has contracted out the administration of its public law housing allocation responsibilities to Eden Housing Association, which includes:

- Determining which applicants are eligible and qualify for an allocation of social rented housing,
- Notifying applicants of decisions made to the about their application for social rented housing,
- Providing advice, information and assistance about making an application for social rent housing,
- Determining which applicants have priority for an allocation of social rented housing
- Determining if an applicant has a local connection that qualifies them for an allocation of social rented housing,
- Providing a summary of how the Cumbria Choice scheme operates, and
- Detecting any fraudulent application made for an allocation of social rented housing

The rules which regulate arrangements for contracting out the administration of housing allocation functions, require local housing authorities to undergo a re-tendering exercise a minimum of every 10 years. The current contractual arrangements between Eden District Council and Eden Housing Association are due to end early 2020. These arrangements are separate to both organisation's membership of Cumbria Choice.

The law⁷⁸ stipulates that a fairly good advantage for allocation of social rented housing must be given to any person who is at risk of being homeless, this includes applicants in the following circumstances:

- Homeless⁷⁹ (including those owed a local housing authority to have their homelessness relived⁸⁰, but also people for whom the relief duty has come to an end and no further duty is owed, plus those who have never made an application for assistance)
- Intentionally homeless, eligible for assistance, and have a priority need for accommodation⁸¹ (owed a duty by a local housing authority to have advice and accommodation for a reasonable period)
- Not intentionally homeless, eligible for assistance and have a priority need for accommodation⁸² (owed a duty by a local housing authority to be provided with suitable accommodation)

⁷⁸ Housing Act 1996, Part 6, section 166A Allocation in accordance with allocation scheme, subsection (3)(a)(b)

⁷⁹ Housing Act 1996, Part 7, section 175 Homelessness and threatened with homelessness

⁸⁰ Housing Act 1996, Part 7, Section 189B Initial duty owed to all eligible persons who are homeless

⁸¹ Housing Act 1996, Part 7, section 190 Duties to persons becoming intentionally homeless

⁸² Housing Act 1996, Part 7, section 193 Duty to persons with priority need who are not homeless intentionally

- Threatened with homelessness and eligible for assistance⁸³ (owed a duty by a local housing authority to be prevented from becoming homeless)

The Cumbria Choice policy was last altered in 2016⁸⁴. The scheme prioritises applicants across five bands, people with the most urgent housing need are placed in Band A, and so forth until persons with lowest need are placed in Band D. Band E, includes applicants whose circumstances conflict with specific aspects of the scheme qualification criteria, for example applicants who have no local connection will be placed in this band. Data supplied by Cumbria Choice shows that at 7 January 2019, 60% of all applicants were in Band D (medium housing need), less than 1% were in Band A (urgent housing need).

Feedback from numerous stakeholders during completion of this review, included concerns about the number of housing applicants to Cumbria Choice, who are homeless or owed a homeless duty, being disqualified due to rent arrears.

Section 3 of the Cumbria Choice policy shows how applicants are prioritised for an allocation of social rented housing.

Band A, for people with an urgent housing need, includes applicants who are not intentionally homeless, eligible for assistance, and have a priority need for accommodation, plus those who are threatened with homelessness.

Band B, for people with high housing need, includes applicants who are homeless, such as those whom a local housing authority believes might have a priority need for accommodation. The awarding of the preference for an allocation of social rented housing is limited to a period of three months, following which, these applicants are moved to Band C.

Band C, for people with a medium housing need, includes applicants who are homeless, such as those whom a local housing authority has assessed as to what duty, if any, is owed. Band C also includes those persons being reduced from Band B, who had been awarded that level of preference more than three-months ago. Due to the wording of the policy, there is some uncertainty as to whether applicants who are intentionally homeless, eligible for assistance, and have a priority need for accommodation are also entitled to Band C status.

Band D, (which features a sub-band referred to as Band D Plus, for applications who are employed for making a community contribution) for people with a low housing need, includes no homeless applicants.

Band E, for people with a reduced priority for an allocation of social rented housing, could include homeless applicants, if their circumstances reflect the criteria specified in the scheme policy. This is especially relevant to applicants who are intentionally homeless, or have no local connection.

The Cumbria Choice policy is framed to restrict applicants who are homeless, or owed a homeless duty, to six-weeks choice of the social rented dwelling they are allocated. Once this period come to an end, where a local housing authority owes a housing applicant a homelessness duty of assistance, they are allowed to make a direct offer, outside the scope of the scheme, with a housing association.

⁸³ Housing Act 1996, Part 7, section Duties in cases of threatened homelessness

⁸⁴ Cumbria Choice Allocation Policy with revisions (2015/16 policy review)

Section 4 of the Cumbria Choice policy describes the procedures for deciding whether an applicant is given any preference for an allocation of social rented housing. Section 4.2. explains that housing applicants who are homeless (which includes persons experiencing street homelessness), do not need to make an application for homelessness assistance, to secure a preference for an allocation of social rented housing. The policy appears to be framed to afford no preference at all for housing applicants who are intentionally homeless, a position that is not permissible in housing allocation law⁸⁵. The policy allows for additional preference of an allocation of social rented housing, to homeless applicants who have made an application for homelessness assistance, whom a local authority might assess as having a priority need for accommodation due to being homeless and eligible for assistance. Those threatened with homelessness within 28 days are also referenced here. These aspects of the policy seem to mis-interpret the requirements of local authorities once an application for homelessness assistance is made⁸⁶. This also fails to recognise recent substitutions made to homelessness law, whereby persons threatened with homelessness are entitled to assistance up to 56 days prior to the potential loss of their existing accommodation⁸⁷.

Procedures for describing how applicants owed a homelessness duty of assistance by a local housing authority, are prioritised for an allocation of social rented housing is also covered in section 4 of the Cumbria Choice policy. Applicants who are not intentionally homeless, eligible for assistance have a priority need for accommodation, plus those threatened with homelessness, are clearly referenced. However, applicants who are intentionally homeless, eligible for assistance have a priority need for accommodation, are not referenced, which is a contradiction of housing allocation law.

⁸⁵ HHJ Luba QC, J., Davies, L., Johnston, C., Buchanan, T. (2018) *Housing Allocation and Homelessness Law and Practice* Fifth Edition. Lexis Nexis. London (p138)

⁸⁶ HHJ Luba QC, J., Davies, L., Johnston, C., Buchanan, T. (2018) *Housing Allocation and Homelessness Law and Practice* Fifth Edition. Lexis Nexis. London (p332-355)

⁸⁷ Homelessness Reduction Act 2017, section 1

4.3 Conclusion about activities to secure accommodation

The increase in households becoming homeless at home needs to be investigated, to understand why this has risen in recent years, whether is providing good outcomes for applicant households. Eden Housing Association need to continue to grow and diversify the portfolio of temporary accommodation, to ensure suitable dwellings are available for households who are owed an accommodation duty. Eden District Council need to publish policies for procuring and allocating temporary accommodation. Consideration should be given to extending private sector leasing arrangements for procuring temporary accommodation, to obtain accommodation for discharging homelessness duties. Although B&B use is low, Eden District Council and Eden Housing Association should set a target to ensure all types households do not remain in this form of temporary accommodation for any longer than one week. Housing associations should be encouraged to demonstrate how they fulfil the duty to co-operate with Eden District Council, in administering homelessness duties. More accommodation is needed for single person households. It is important to recognise that Eden Housing Association is able to help all households move-on from with temporary accommodation with six months.

A comprehensive range of initiatives is needed to carry out homelessness relief casework. The lack of relief activity will result in people continuing to experience street or hidden homelessness for longer than they otherwise would have to. Evidencing the case work outcomes from relief activity will be crucial to demonstrating the success of Eden Housing Association's activities for advising and assisting homeless households.

Increasing access to PRS accommodation, to discharge any homelessness duty, will make the best use of the private rented sector. Better alignment is needed between PRS enforcement work, plus the Empty Homes Strategy, to develop local priorities for tackling homelessness. Eden District Council and Eden Housing Association are considering the creation of a social letting agency. The joint working with housing benefit administrators should continue.

More social rented housing is needed in the district, especially in the four market towns. When the Tenancy Strategy is next modified, a review should take place and early warning systems established between housing associations and Eden District Council, to prevent homelessness from fixed term and affordable tenancies coming to an end, or an occupant not being granted succession or assignment. More clarity is needed about the number and proportion of housing allocations made to homeless applicants (including those owed a homeless duty). Prior to re-tendering for the administration of housing allocation functions, Eden District Council should complete an appraisal to determine whether the best option is to continue contracting-out to a third-party supplier. Separately, Eden District Council should carry out a review to decide whether remaining a member of Cumbria Choice is the best option for the Council. Alterations need to be made to the Cumbria Choice scheme, in relation to how the policy is framed regarding homeless households (including those owed a homeless duty). More generally, the policy doesn't take account of law, statutory guidance, plus regulations and orders that have come into force, since the last alterations were made in 2016.

5. Providing support

This chapter reviews the support provided to people who are homeless or have been homeless. Support can mean information, advice or assistance, all of which can help a person to stop being homeless, plus avert a repeat occurrence of homelessness in the future.

Previously local housing authorities were not obligated to carry out an assessment or formulate a plan for people who are homeless. However, following the enactment of the HRA17, a new duty⁸⁸ came in to force requiring councils to undertake such a process for every person who is homeless or threatened with homelessness and eligible (as defined by law) for assistance. The assessment must cover:

- Causes of homelessness,
- Housing needs, and
- Support needs

The findings from the assessment must be carried forward to formulate a personalised plan that satisfies a persons' housing and support needs. People have a right to expect plans that are revised as needs or circumstances change. Local authorities will be required to discharge this duty for up to a continuous period of 56 days.

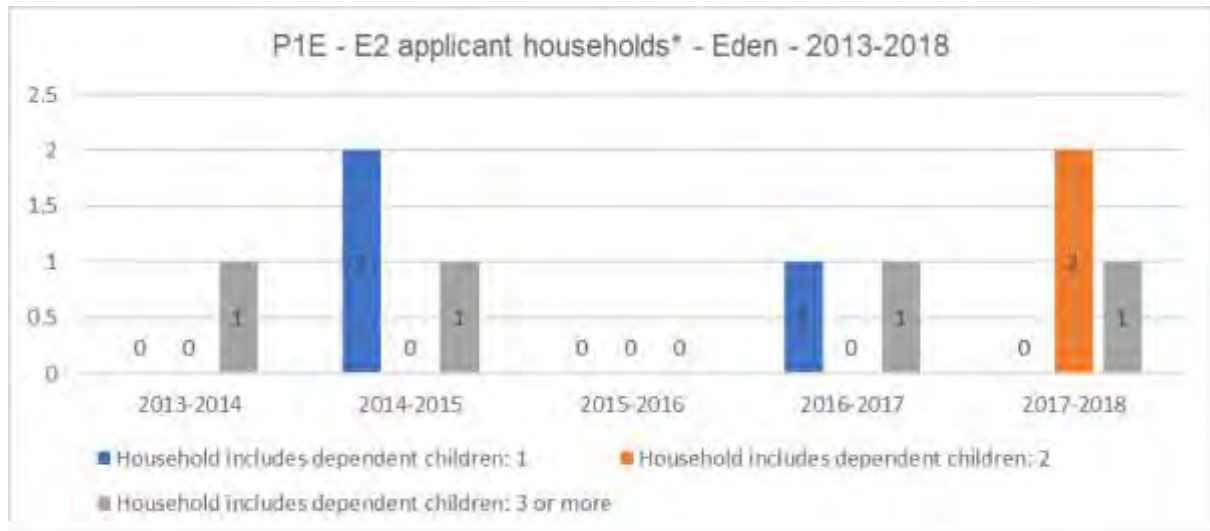
Prior to the commencement of this new duty, which is the period covered in this report, people experiencing homelessness might receive an assessment of their needs from various public authorities (eg adult social care) or voluntary organisations (eg housing support providers). The conclusions of these assessments are used to formulate a package of support, sometimes offered in response to a legal duty (eg arising from the Care Act 2014), or in accordance with contractual requirements laid down between a local authority commissioner and service provider.

5.1 Support needs of people experiencing homelessness

The reasons why people become statutory homeless offer an indication as to the support people require. Eden Housing Association collects some information on these factors, which has been analysed for the purpose of this review.

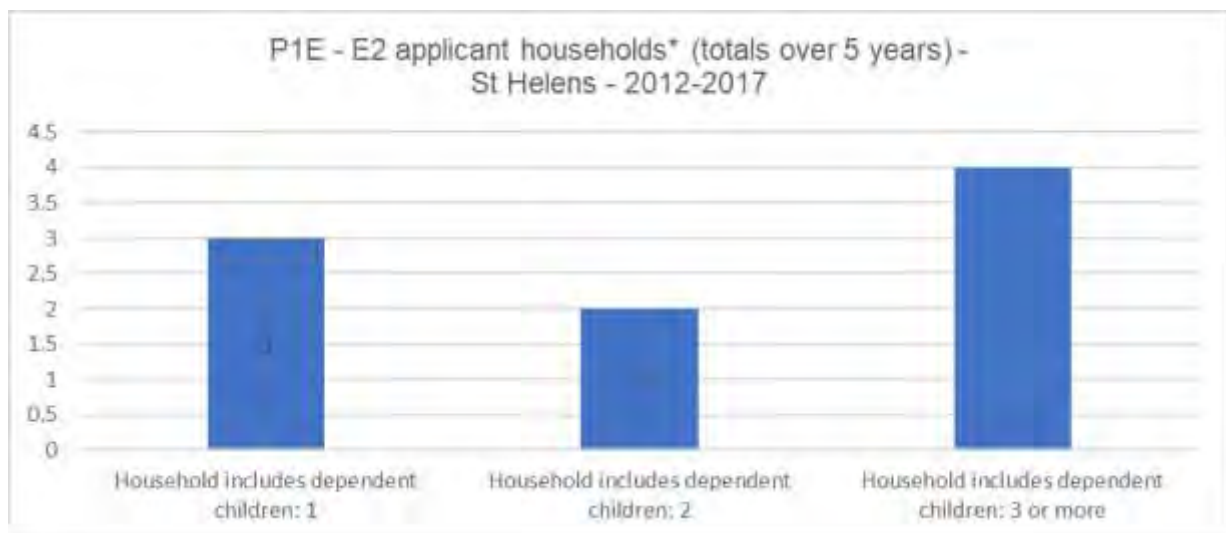
50% (11) of applicant households found eligible for assistance, unintentionally homeless and in priority need had dependent children. The number of children within 2 households homeless as a result of emergency were not recorded.

⁸⁸ Housing Act 1997, Part 7, section 189A Assessments and personalised plans



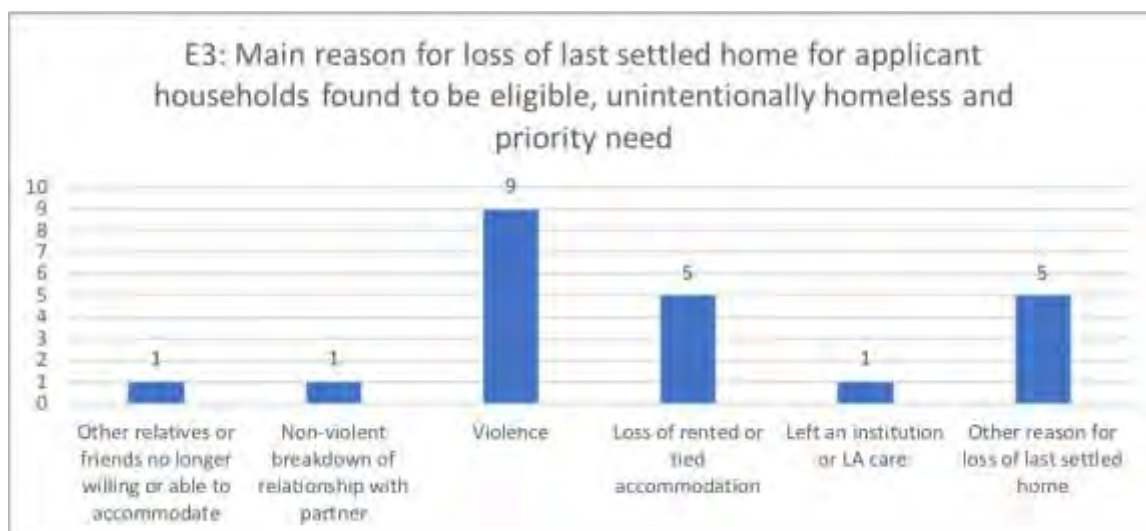
Source: Eden District Council, P1E

During the past five years, households with one child equates to 33% of all households, those with two children equated to 22%, and those with three children or more equated to 45%.



Source: Eden District Council, P1E

Of those accepted as eligible, unintentionally homeless and in priority need, 41% lost their last settled home as a result of violence, 23% due to loss of rented or tied accommodation and 23% recorded as 'other reason'.



Source: Eden District Council, P1E

When compared to national statistics, locally, there is a much higher rate of household becoming homeless due to violence, and a much lower rate of households becoming homeless due to families and friends no longer willing or able to accommodate.

Table 2: Nationally the reason for loss of last settled home (for those owed a prevention or relief duty). England, April to June 2018

Family and friends no longer willing or able to accommodate	22%
Non-violent relationship breakdown with partner	7%
Violent relationship breakdown with partner or associated persons	8%
Loss of rented or tied accommodation	30%
Other reasons	33%

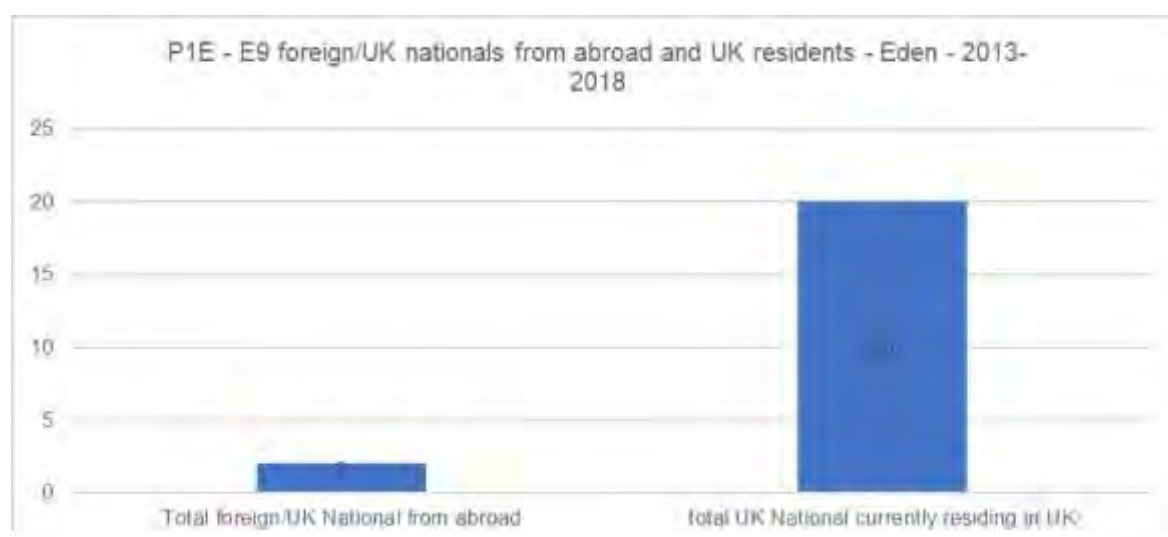
Source: Ministry of Housing Communities and Local Government

UK nationals currently residing in the UK has consistently been the main type nationality of person to whom the local authority has accepted a duty of assistance.



Source: Eden District Council, P1E

Locally, the vast majority (91%) of those identified as eligible, unintentionally homeless and in priority need are UK nationals residing in the UK, 9% are foreign nationals or UK nationals from abroad. Nationally, 8% of acceptances are foreign nationals or UK nationals from abroad.



Source: Eden District Council, P1E

5.2 Housing support

Eden District Council works in a collective countywide partnership, managed by Cumbria County Council, to deliver housing related support. The membership of the partnership also includes the other five Cumbrian local housing authorities, plus other public authorities, voluntary organisations, housing associations and others. Grants were originally awarded to 5 of the six districts to support those who are homeless or at serious risk of homelessness; this has been extended to all six districts from April 2018-19.

Table 1: Support units by cohort, by district 2017/2018

District	Domestic Abuse	Young people 16-24	Generic
Allerdale	21	0	49
Barrow in Furness	50	0	11
Carlisle	29	60	146
Copeland	40	0	0
Eden	25	6	14

Source: Cumbria County Council

People are supported on a short-term basis until they have gained the skills needed to maintain their own home. People apply for support directly to service providers who use a common index assessment to determine qualification for support. Support is usually provided for up to two years. People in receipt of support must pay for their accommodation, and any associated personal charges. A claim for help to pay housing costs can be made to the local authority housing benefit department, but this excludes any charges for heat, water, food, and other service related charges. The cost of the support is paid for by Cumbria County Council, via contractual arrangement with third-party support providers, which are renewed on a periodic basis.

In 2016/2017 Cumbria County Council received 1088 referrals for support linked to short term accommodation, 475 (44%) of which received support. Eden made 55 referrals equal to 5% of all referrals made.

In 2017/2018 a total of 1013 referrals were made, 317 (31%) of which received support. Eden made 51 referrals as with the previous year, equal to 5% of all referrals made.

Move on data for 2017/2018 in Cumbria recorded 45% of people were supported to secure move on accommodation, of which 42% moved in with family/partner/friends. 26% secured social housing and 15% secured PRS housing. 26% of people moving on, continued to receive support.

People requiring supported housing can make an application via a central access point, which is managed by CuCC. There was no data available for this review on the number of successful referrals (generally or specifically relating to cases of homelessness), and the subsequent outcomes once a referral has been accepted. Feedback from stakeholders about the central access point was mixed. There was support for the concept of the central access point, but dissatisfaction about how it operated in practice, with concern about the number of unsuccessful referrals.

CuCC commission Impact Housing (part of Riverside housing association) to provide the accommodation-based support in the Eden district, specifically for young people aged 16-24 years. Impact Housing's Eden Rural Foyer offers 15 single occupation self-contained flats. Six units are funded by CuCC, at total charge of £262.16 per

week (inclusive of a £5.31 personal charge) the remaining units do not receive funding from CuCC, so are charged at the lower rate of £107.78 (inclusive of a £4.95 personal charge). Alongside this, CuCC fund:

- Depaul UK to provide Nightstop across the county, including in Eden
- 6 units of support from Turning Point for people of any age
- 8 units of support from Richmond Fellowship for adults experiencing mental illness
- 25 units of support for victims of domestic abuse, this provision is in addition to that offered by CDAP

Cumbria County Council also commissions supported living schemes (including extra care housing) for people with long-term needs, for example due having enduring mental ill health, a learning disability, or being of an old age. All of these schemes contribute indirectly towards the relief of homelessness, by accommodating people that would otherwise have nowhere to live.

Any performance monitoring regime that might be operated by CuCC, requiring support providers to submit data about progress of outcomes, results achieved, activities carried out and resources utilised, has not been made available for this review. Nor has any recent needs or gap analysis that CuCC might have completed.

5.3 Other support

Presently, information, advice and assistance for people experiencing street homelessness is provided by Eden Housing Association on an ad-hoc basis. Whenever a report of someone sleeping rough is received, via the national reporting system Street Link, or otherwise, Eden Housing Association employees will be deployed to find whoever is sleeping rough, to help them obtain accommodation and support. During periods of severe weather (when the temperature drops below zero) additional provision is made available. During 2018, this was activated for 9 nights in 2018, rising to 12 in 2019. Eden District Council, together with the other five Cumbrian local housing authorities, have successfully won funding from MHCLG, to establish a countywide rough sleeping initiative. Three workers will operate across six local districts (including Eden) to co-ordinate activities to help people found to be rough sleeping or those at risk of rough sleeping.

Penrith Building Society (PBS), in partnership with Eden District Council reintroduced from April 2019, an equity loan scheme, previously run from 2013-2016. The Eden Mortgage Boost Scheme helps people from the local area to buy a home, by reducing the size of deposit they need. Eden District Council provides a grant on 20% of a property's value, paid directly to PBS, with a person providing a 5% deposit. PBS have committed to some fees being waived and in specified circumstances legal costs can be reduced by £500.

A Salvation Army church, located in Penrith, provides support to help people enter into employment, by providing support with searching for jobs, advising on welfare benefit entitlements and other support, and advice about qualifications.

The Upper Eden Food Bank is a church-led project that provides food parcels to people within the specified areas of Eden, such as Appleby, Kirkby Stephen, Penrith and Tebay. Eden Housing Association assists with storage and collection of the food donations. Referrals to the food bank can be made by CACE, CuCC, Eden Housing

Association and others. The food bank is entirely reliant upon donations of food, and money, plus people volunteering their time to collect, sort and distribute the food. During 2018, 441 people were provided with a food parcel, a 21% increase compared to the previous year.

The Eden and South Lakeland Credit Union (ESLCU) is member owned financial co-operate, regulated by the Financial Conduct Authority. ESLCU helps its members to manage their money, by providing fair loans and simple ways of saving. Based in Penrith, with outreach sessions taking place across the area, a number of housing associations, including Eden Housing Association, Impact and Riverside, have agreements to support tenants via the offer of financial incentives, to join ESLCU.

Age UK Carlisle and Eden, provide support to older persons. The charity has offices in Penrith and Appleby, where people can receive advice and information on housing and welfare benefits, in addition to numerous other matters.

5.4 Conclusions about activities to provide support

Given the prevalence of families who become homeless, strategic and operational links must be made between activities for tackling homelessness at the district level, and efforts to assist troubled families at the county level. Given the presence of children who are members of homeless households, awareness raising about the causes and solutions to homelessness should take place in schools. An external evaluation should be carried out on the work done by CDAP, for victims of domestic abuse, to establish the future of this project beyond its fixed-term. Research should be commissioned to investigate why the rates of homelessness due to domestic abuse are significantly higher in Eden compared to those nationally. Targeted support is needed for people at risk of eviction from the PRS.

Given the low number of people who receive support, compared to those who apply for it, Eden District Council would benefit from an up-to-date housing support needs and gap analysis, to better understand CuCC's commissioning decisions. Furthermore, clarity is needed on CuCC's vision, values, strategic objectives and broader framework, including how the priorities of Eden District Council's homelessness strategy will inform commissioning decisions. CuCC could share more intelligence about service provider and service user outcomes with Eden District Council, beyond the data about planned move on. Given the mixed feedback about the supported housing central access point, Eden District Council and should seek to collaborate with CuCC, to understand what works well and what could work better. Opportunities to align the commissioning of domestic abuse housing support, to CDAP should be explored. Evidencing homelessness related outcomes being achieved by supported living scheme for vulnerable adults should be pursued by CuCC and Eden District Council. Eden District Council should suitably contribute to any service provider inspection CuCC carryout of support providers.

The emerging new initiative to support people who are experiencing street homelessness, will fill a gap in service provision. This programme should be subject to an external evaluation, to ensure successes are captured and disseminated, and the work can be sustained after the short-term funding has come to an end. Information about support available from voluntary organisations (eg employment advice, food bank, credit union, etc) needs to be readily available for people experiencing homelessness. Specific support should be available for people experiencing hidden homelessness.

6. Resources for tackling homelessness

This chapter reviews the resources available to carry out activities to tackle homelessness. For the purpose of this review, the resources considered were the money, people and IT available to Eden District Council.

6.1 Money

Eden District Council is responsible for funding the administration of homelessness it is legally obliged to discharge, which Eden Housing Association is contracted to deliver. The homelessness service carries out an array of activities, such as homelessness prevention, housing options advice and the provision of temporary accommodation. These are described in detail in chapters three and four of this review. Alongside the money committed from Eden District Council's own budget, additional funding is awarded by MHCLG.

Since the publication of the previous homelessness strategy, in 2013, up the end of March 2018, MHCLG allocated £646k revenue funding to Eden District Council:

- £500k – Homelessness Grant
- £128k – Flexible Homelessness Support Grant (FHSG)
- £18k – HRA17 New Burdens Fund

Eden District Council has received a Homelessness Prevention Grant since 2003, the purpose of which is to help deliver local objectives for tackling homelessness. The amount awarded by the UK Government has remained broadly consistent since this funding stream was created 16 years ago, even though in real terms the costs have increased. The funding can be used for initiatives carried out by the local authority or invested into projects operated by voluntary organisations. The current funding is guaranteed until March 2020. It is uncertain if this funding stream will continue in the next spending period starting from April 2020. Eden District Council use this money to help fund activities carried out by Eden Housing Association to prevent homelessness, such as reducing rent arrears, PRS access assistance (eg rental deposits), property security enhancements for victims of domestic abuse, and other initiatives that can help people to remain in their existing home, or obtain alternative accommodation. Eden District Council receive the largest allocation of any Cumbrian local housing authority, equating to more than one-quarter of all monies allocated across the county. This compares well to the levels allocated for the county and the region.

Table 2: MHCLG Homelessness Grant 2016/2017 – 2019/2020

Area	Amount	% of budget
England	£315m	100%
North West	£22m	6% of national total
Cumbria	£1.8m	8% of regional total
Eden	£500k	27% of county total

Source: MHCLG

FHSG replaced the Temporary Accommodation Subsidy regime previously administered by the Department for Work and Pensions, for more than a decade until March 2017⁸⁹. The new funding arrangement replaced a tightly controlled subsidy system to procure and manage temporary accommodation, which could only be used once a person had become homeless. The new grant system enables flexibility to spend the funding on preventing homelessness, in addition to assisting those who are homeless. This funding is guaranteed until March 2020, it's uncertain if this funding stream will continue in the new spending period starting from April 2020.

Under the previous system, Eden District Council would have claimed a small £3k subsidy therefore, the Council is a net beneficiary under the new grant funding rules. Eden District Council were allocated £120k, a 97.5% budget increase⁹⁰, but the joint lowest allocation amongst the six Cumbrian local housing authorities. The allocation compares favourably to relative rates for the county and the region⁹¹.

Table 3: Flexible Homelessness Support Grant 2017/2018 – 2019/2020

Area	Amount	% of budget
England	£677m	100%
North West	£19m	6% of national total
Cumbria	£1.1m	5% of regional total
Eden	£120k	11% of county total

Source: MHCLG

The UK Government has made the new burdens grant available to help meet the requirement of the Homelessness Reduction Act 2017⁹². An example of this is the homelessness service upgrading their data system to allow a better understanding of how the new legislation is changing homelessness prevention in the area. This funding is guaranteed for only two years, it uncertain whether further funding will be available in the new spending period starting April 2020. Eden District Council received an allocation of £18k, the lowest amount of all six Cumbrian local housing authorities, however this is relatively equal to the amount awarded to the county and region⁹³.

⁸⁹ Ministry of Housing, Communities & Local Government. (2017). Flexible homelessness support grant – funding allocations formula explanation

⁹⁰ Ministry of Housing, Communities & Local Government. (2017). Flexible homelessness support grant – funding allocation

⁹¹ Ministry of Housing, Communities & Local Government. (2017). Flexible homelessness support grant – funding allocations methodology note

⁹² Ministry of Housing, Communities & Local Government. (2017). Homelessness Reduction Act: allocation of new burdens funding

⁹³ Ministry of Housing, Communities & Local Government. (2017). Flexible homelessness support grant – funding allocations methodology note

Table 4: HRA17 new burdens funding 2017/2018 – 2019/2020

Area	Amount	% of budget
England	£71m	100%
North West	£4.5m	6% of national total
Cumbria	£246k	5% of regional total
Eden	£18k	7% of county total

Source: MHCLG

Eden District Council supported Impact Housing, to make a successful bid to the Homes and Communities Agency's Platform for Life capital funding programme, securing £150k from a £7.4m national budget. Impact Housing used these monies to create three additional units of accommodation at the Eden Rural Foyer, which houses young people who are homeless or threatened with homelessness. The amount awarded to Impact Housing equates to two-thirds of total allocation for Cumbria. This compares well to the relative rates for the county and the region.

Table 5: Platform for Life 2015/2016 – 2017/2018

Area	Amount	% of budget
England	£7.4m	100%
North West	£2.2m	29% of national total
Cumbria	£220k	10% of regional total
Eden	£150k	68% of county total

Source: MHCLG

Eden District Council, together with the other five Cumbrian local housing authorities, submitted a successful bid to MHCLG's Victims of Domestic Abuse Support Fund, securing £730k from a £19m national budget⁹⁴. This funding, which was allocated for spending from over a two-year period from 2016/2017 – 2017/2018, is resourcing the CDAP activities (see chapter three for further details). A further £22m was allocated for another two years (2018/2019 – 2019/2020), however none was awarded to Cumbria.

In addition to the above referenced monies, MHCLG have allocated further grant funding in excess of £125m⁹⁵, but none of this money has reached Eden (nor the

⁹⁴ Ministry of Housing, Communities & Local Government. (2018). Press release: £19m fund to support victims of domestic abuse.

⁹⁵ See chapter one, national context, for details of specific grant funds.

rest of Cumbria). Some of this funding has been prioritised for areas with high levels of rough sleeping, which would exclude Eden. However, the majority of the money has been won via successful joint bids for targeted initiatives, such as preventing homelessness due to hospital discharge, piloting the Housing First Approach, help to access PRS accommodation, help for homeless armed forces veterans.

Looking ahead to 2019/2020, the six Cumbrian local housing authorities have been able to successfully make joint bids of £80k from the third round of MHCLG's Rough Sleepers Initiative fund. This will provide vital funding to help deliver a countywide response to rough sleeping (see chapter five for further details). Additionally, an allocation of funding (amount to be confirmed at the time of writing) has been awarded from the third round of MHCLG's Rapid Rehousing Pathway fund, for helping people out of street homelessness. Additionally, Homes England has a £50m capital funding budget available until 2021, to which bids can be made by housing associations, to help develop move on accommodation for households occupying temporary accommodation.

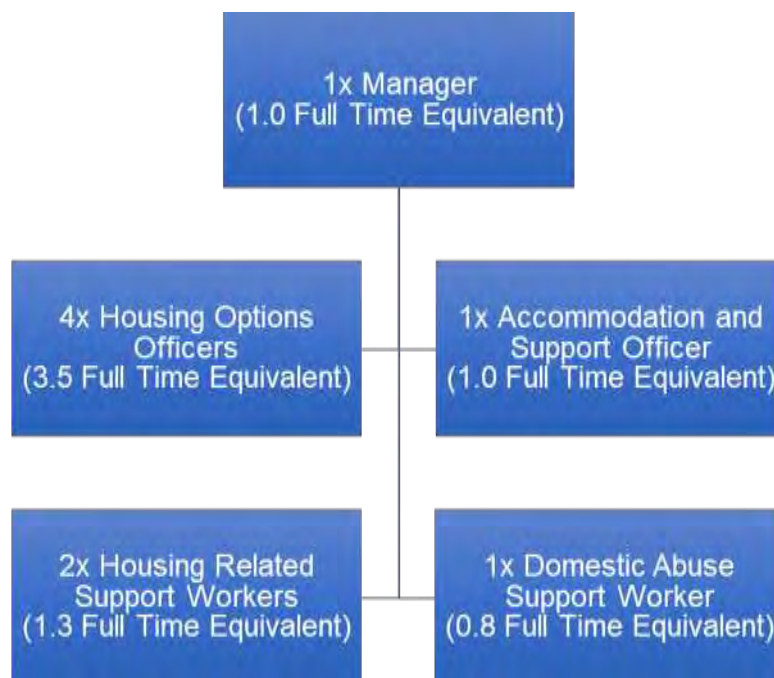
6.2 People

Eden District Council funds Eden Housing Association to administer homelessness (and also housing allocation) functions, which employs a total of nine people (7.5 full-time equivalent). Prior to the commencement of the HRA17, the service was staffed by two people (1.2 full-time equivalent), whom undertook all duties. Additional posts have been created following the enactment of the HRA17, to ensure there is sufficient capacity to cope with the new burdens that have arisen. Following the enactment of the HRA17, there has been an increase in the number of people making an application for homelessness assistance. Furthermore, the typical time period a case remains open has increased.

Housing Options Officers cover a mixture of pre-booked appointments, plus emergency presentations (full details of activities can be found in chapters three and four of this review). Other officers enhance the advice and assistance that the service offers, by supporting people to prevent a reoccurrence of homelessness. Officers receive training on homelessness law and practice from the National Homelessness Advisory Service and other independent providers of training.

The service manager controls the service budget, carries out staff meetings and supervision and oversees team performance. Additionally, this post requires liaison with internal and external partners at various local and sub-regional forums. A structure chart for the team is shown below.

Diagram 1: Eden District Council Homelessness Service Staffing Structure, March 2018



Eden District Council employs one officer to commission and monitor Eden District Council's delivery of homelessness (and housing allocation) functions. This involves regular contract monitoring meetings, alongside analysis of performance outcomes, plus periodic strategic evaluations of service delivery. Additionally, this post-holder also oversees the implementation of the local homelessness strategy, key tasks associated with this include coordinating the implementation of the homelessness strategy action plan, enabling joint working with neighbouring local authorities, plus also with other public authorities, voluntary organisations and others, plus providing information for elected councillors to scrutinise the progress towards local objectives for tackling homelessness.

6.3 IT

Eden Housing Association's homelessness service previously used a basic IT system to record case work outcomes. However, due to the age and limitations of the product, an agreement was reached for a new software system to be introduced from April 2018. The new system delivers a range of automated efficiencies, that will help Eden Housing Association to discharge all HRA17 duties arising, plus receiving referrals from public authorities who have a duty to take such action. The system is designed to help Eden Housing Association and Eden District Council to easily compile statistical data for return to MHCLG, plus will ensure compliance with data protection law.

6.4 Conclusions about resources for tackling homelessness

Achievements accomplished from expenditure of MHCLG funding must be evidenced to demonstrate how Eden District Council and Eden Housing Association are able to deliver more effective, better quality, and greater value outcomes for people who are homeless or threatened with homelessness. Securing assurances of funding arrangements from April 2020 is essential. With homelessness levels forecast to increase during the next five years, current funding levels will need to be at least maintained, and ideally increased. Securing a greater share of national funding opportunities, must be a priority for Eden District Council, key to success will be the countywide homelessness officers forum making successful bids.

Eden Housing Association's current staffing levels are likely to be adequate, with future levels of homelessness forecast to increase, the current number of employees need to be retained. The additional burdens arising from the HRA17 has resulted in the increase of workloads, meaning more staff will be required, an addition part-time housing solutions officer should be sufficient. Eden District Council must continue to ensure there is dedicated post for carrying out homelessness enabling, policy and strategy matters.

The updated IT software system will prove to be invaluable, creating time efficiencies for staff, as well as controlling the consistency and quality of the work of the team. Staff need to be able to use this technology offsite, to allow more and better advice to be given.

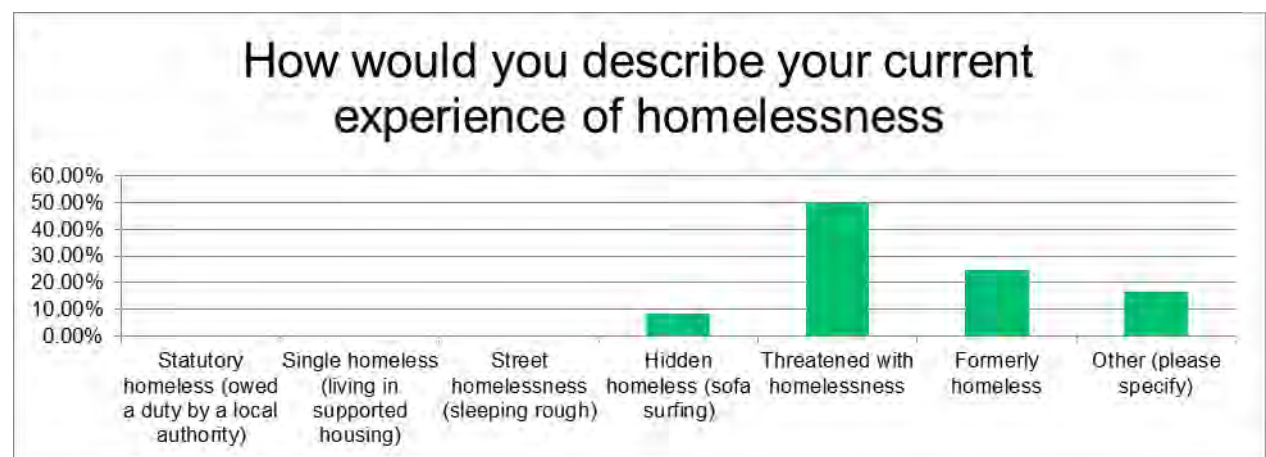
7. Consultation

This chapter shows the results from two surveys carried out with service users and stakeholders. The surveys were carried out to gather quantitative data on people's attitudes, opinions and experiences of homelessness in Eden.

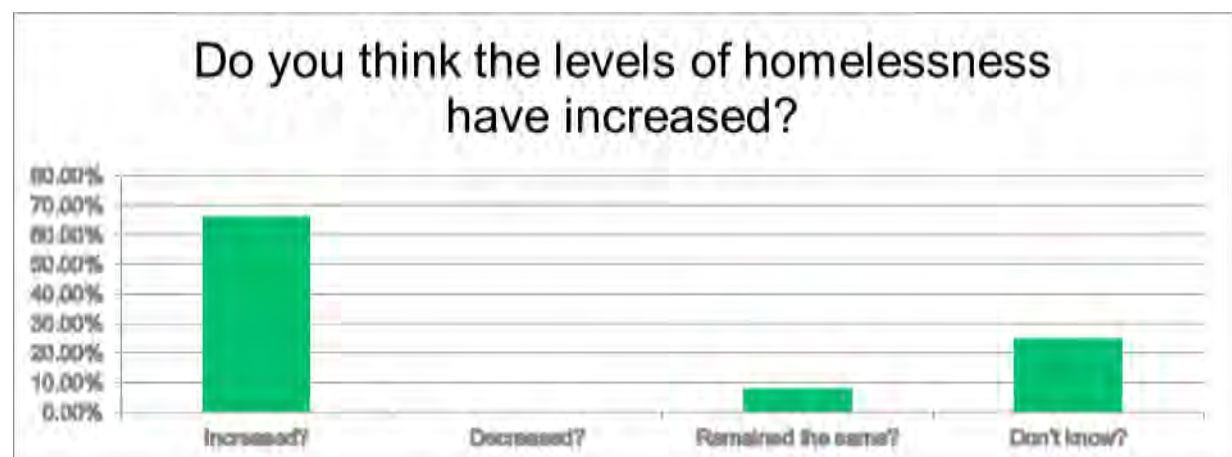
7.1 Service user consultation

Between 23 October 2018 and 21 November 2018, a total of 12 responses were completed by way of an online survey to complete the Eden Homeless Strategy 2018–2023. The survey was made up of 10 questions and achieved an 100% response rate.

6 of the 12 service users (50%) described themselves as threatened with homelessness, 3 service users (23%) had previously been homeless, 2 service users (17%) had experienced difficulties finding suitable affordable accommodation and 1 (8%) had experience of sofa surfing.

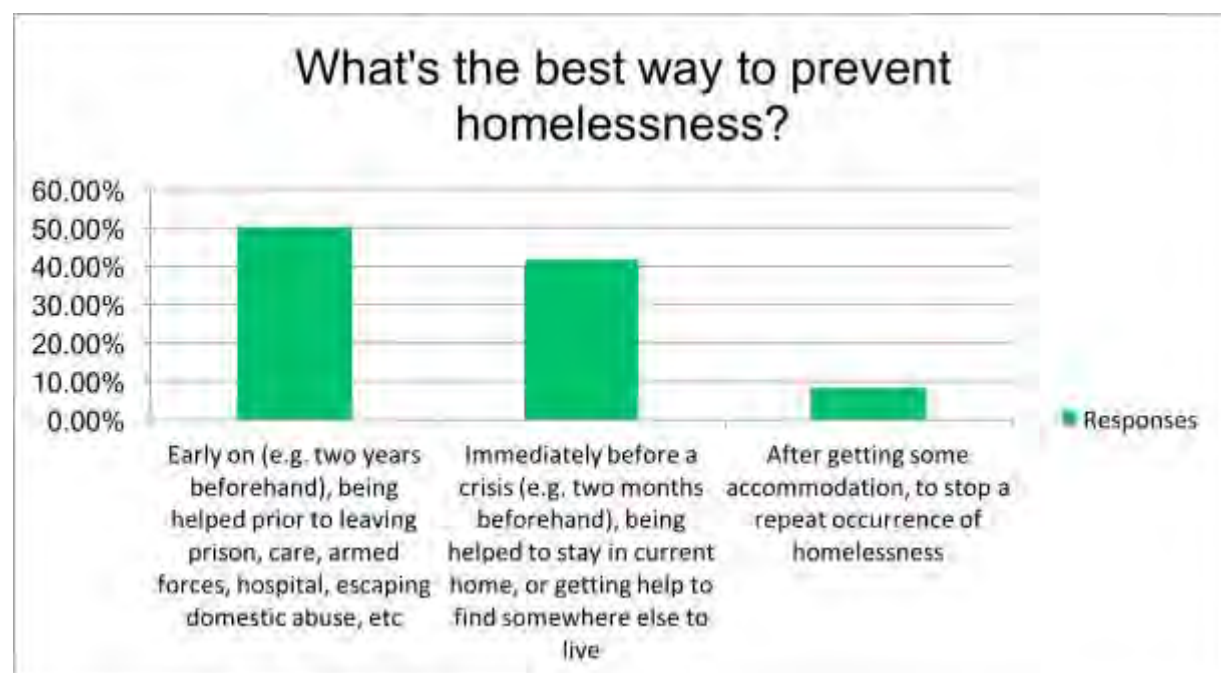


8 of the 12 service users (67%) stated that they believed homelessness had increased over the last five years, 3 service users (25%) didn't know and 1 (8%) felt homeless levels had stayed the same.

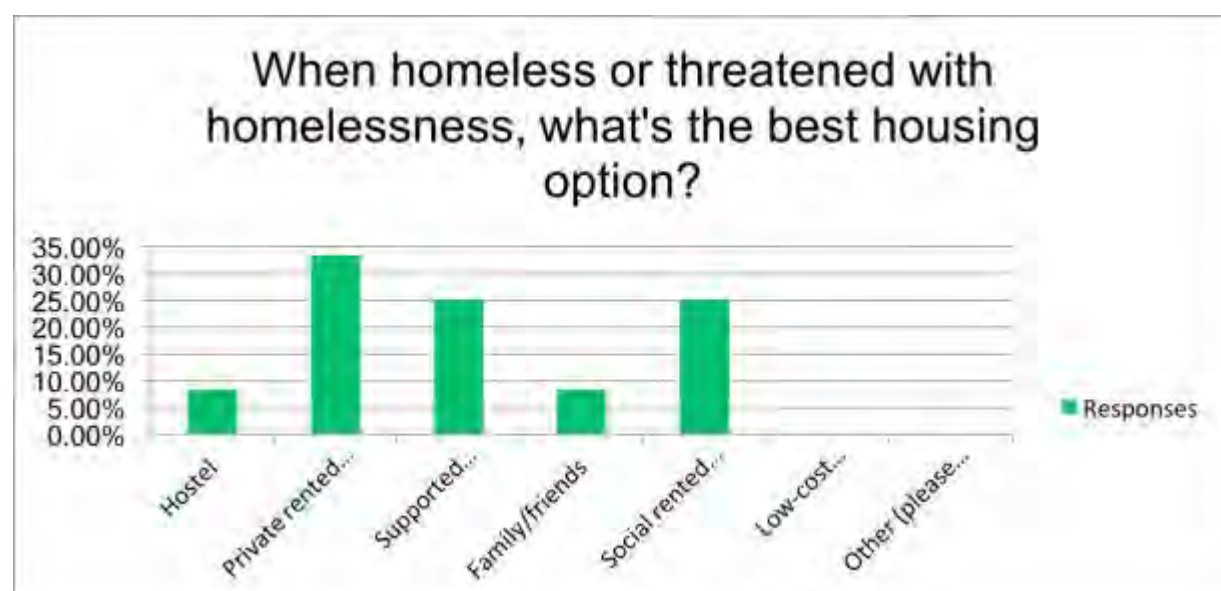


When asked what they believed was the best way to prevent homelessness 50% believed being helped early on, for example 2 years before needing accommodation, would prevent homelessness. 42% believed receiving help a couple of months

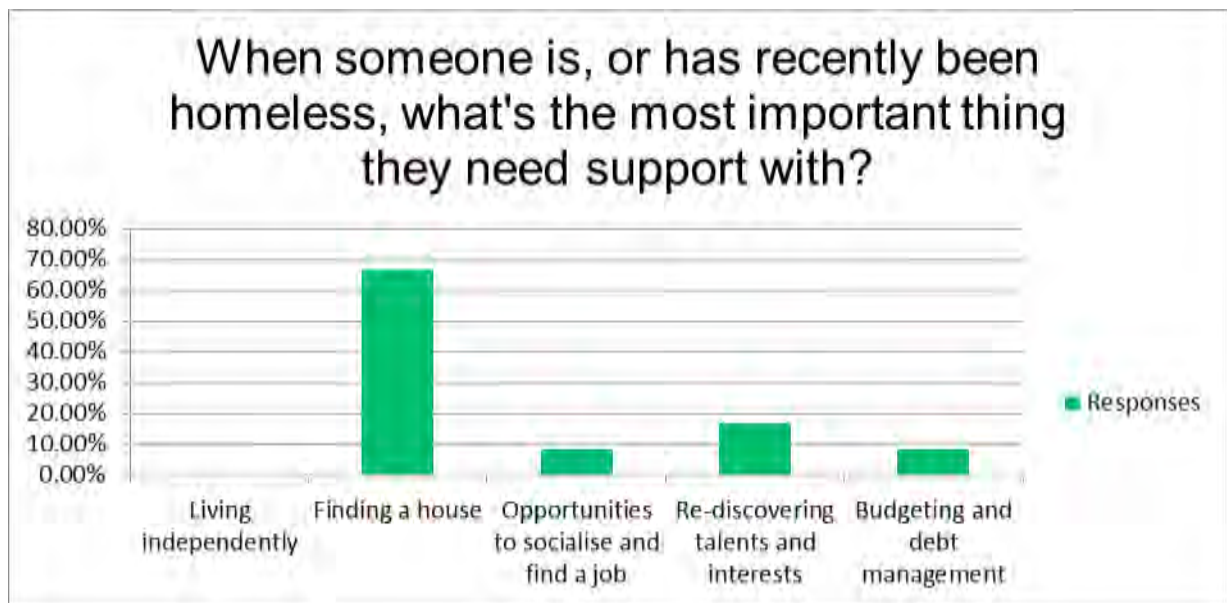
before a crisis would prevent homelessness. 1 service user (8%) believed help after getting accommodation would help to prevent repeat homelessness.



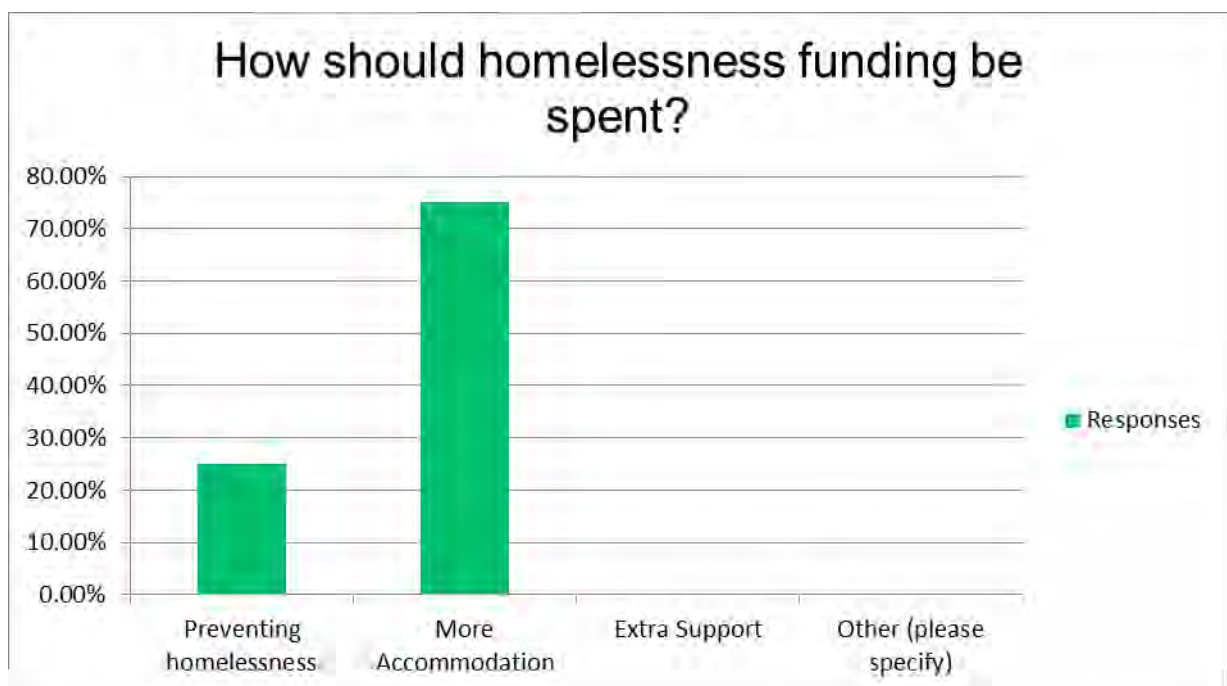
When asked what the best housing option was when homeless or threatened with homelessness 33% felt private rented sector housing was the best option. 25% felt supported housing was the best option and 25% felt social housing was the best housing option. 8% (1 response) felt a hostel was the better option and 1 service user (8%) felt staying with friends or family was a better option.



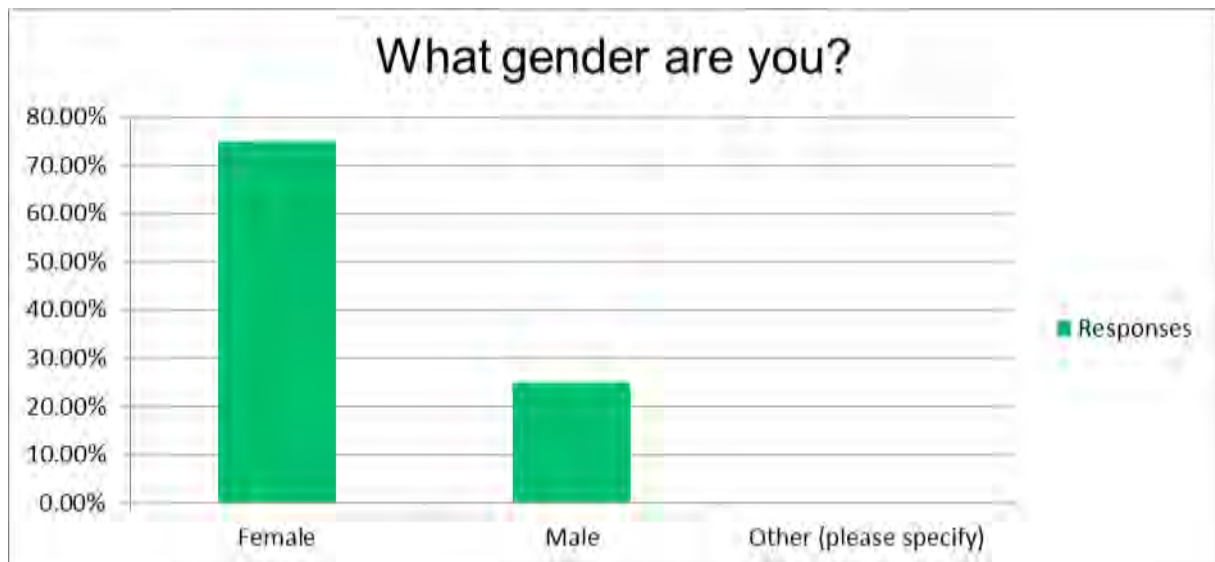
When homeless or having recently been homeless 67% felt the most important support need was to find a house, 17% felt the most important need was to rediscover talents and interests. 8% (1 response) felt budgeting and debt management support was the most important support need. 1 service user felt support to socialise and find a job most important.



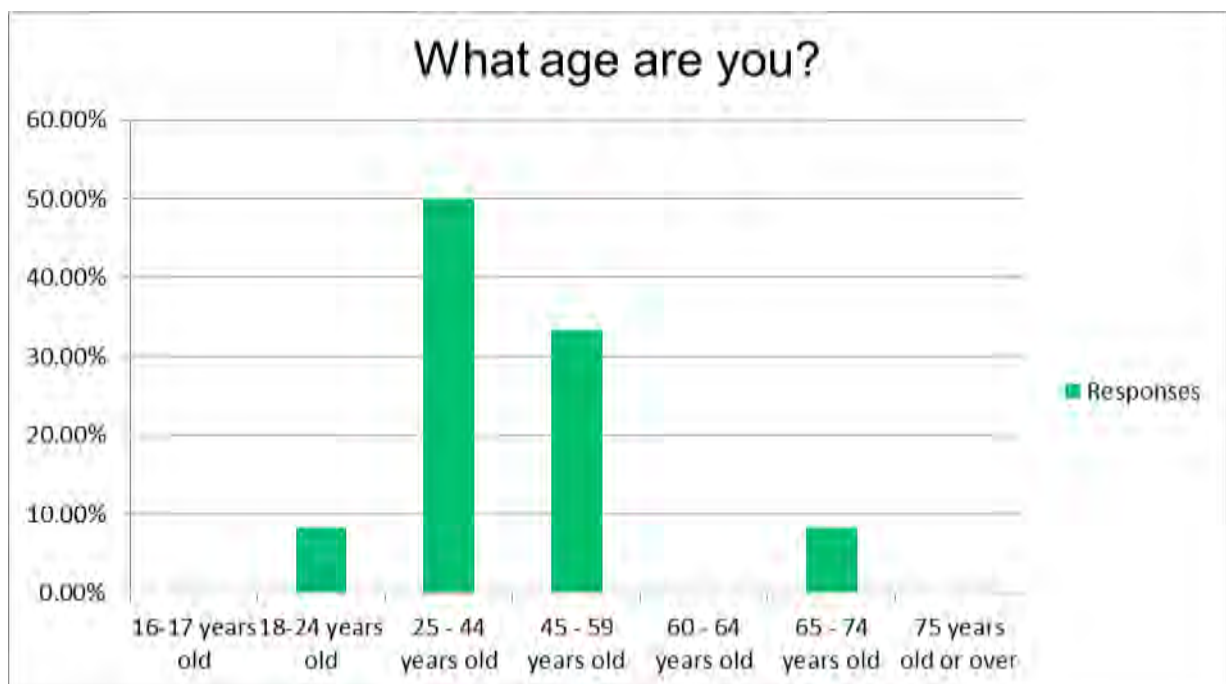
When asked how homeless funding should be spent 75% felt it should be used to fund more accommodation and 25% felt it should be spent on preventing homelessness.



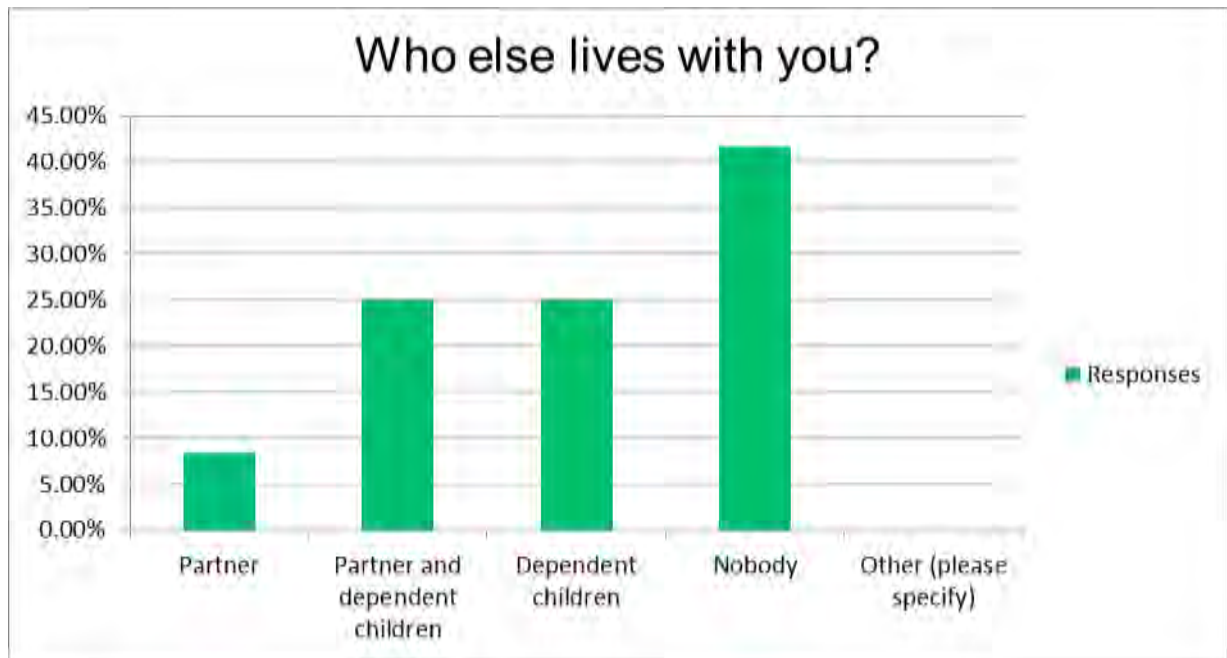
Of the 12 service users completing the survey 9 were female and 3 were male.



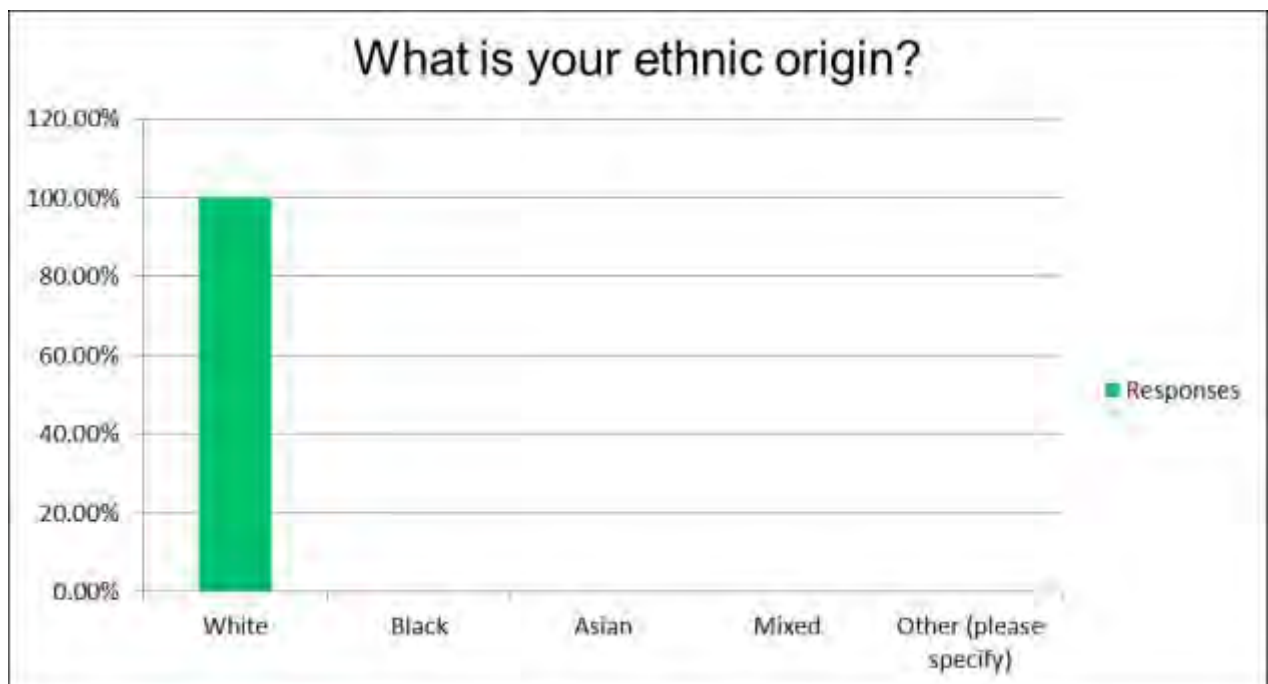
Of the 12 service users completing the survey 1 was aged 18-24, 6 were aged between 25-44, 4 were aged between 45-59 and 1 was aged between 65-74.



Of the 12 service users interviewed 5 lived alone, 3 lived with a partner and dependent children, 3 lived with dependent children and 1 lived with a partner.



All 12 service users interviewed were of white ethnic origin.

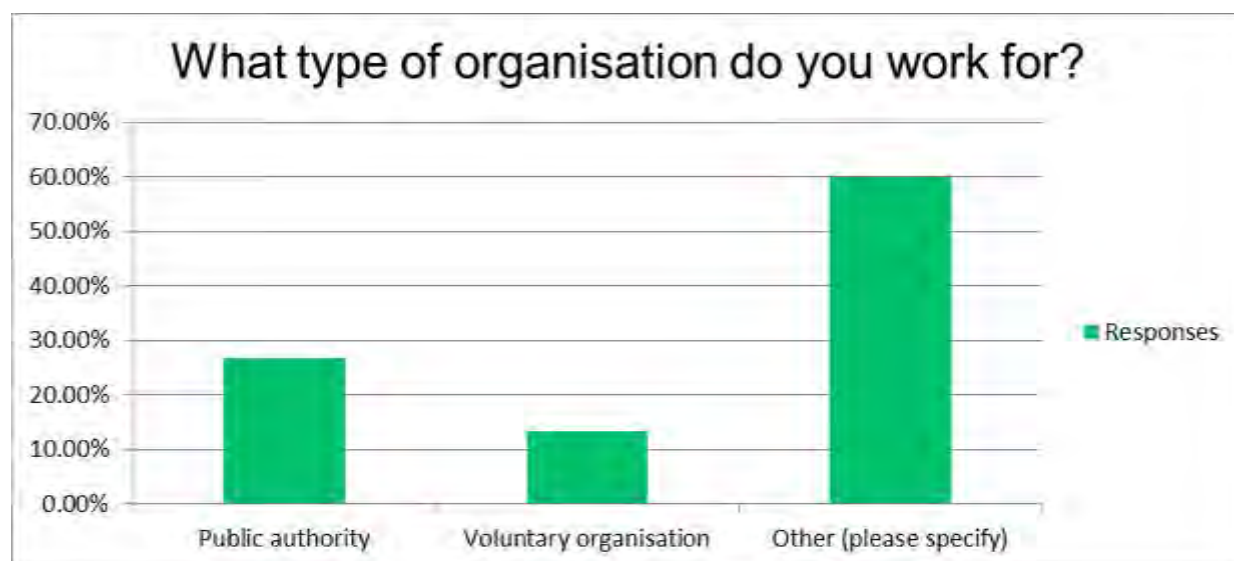


7.2 Stakeholder consultation

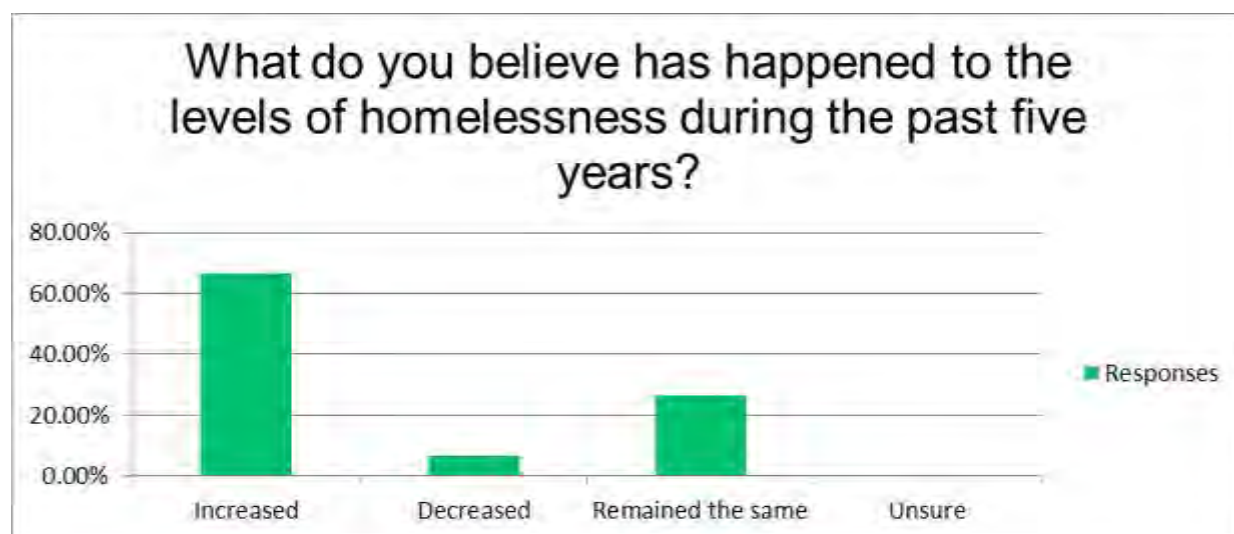
On 14 November 2018, a total of 32 email invitations to complete the Eden Homeless Strategy 2018–2023 Stakeholder Consultation were sent out. When the survey closed on 27 November 2018 a total 15 responses were received – a 47% response rate. The survey was made up of 9 questions and achieved an 100% response rate.

27% of responders were from a public authority, with the vast majority from Eden District Council, 27% of respondents were from housing associations. The remaining

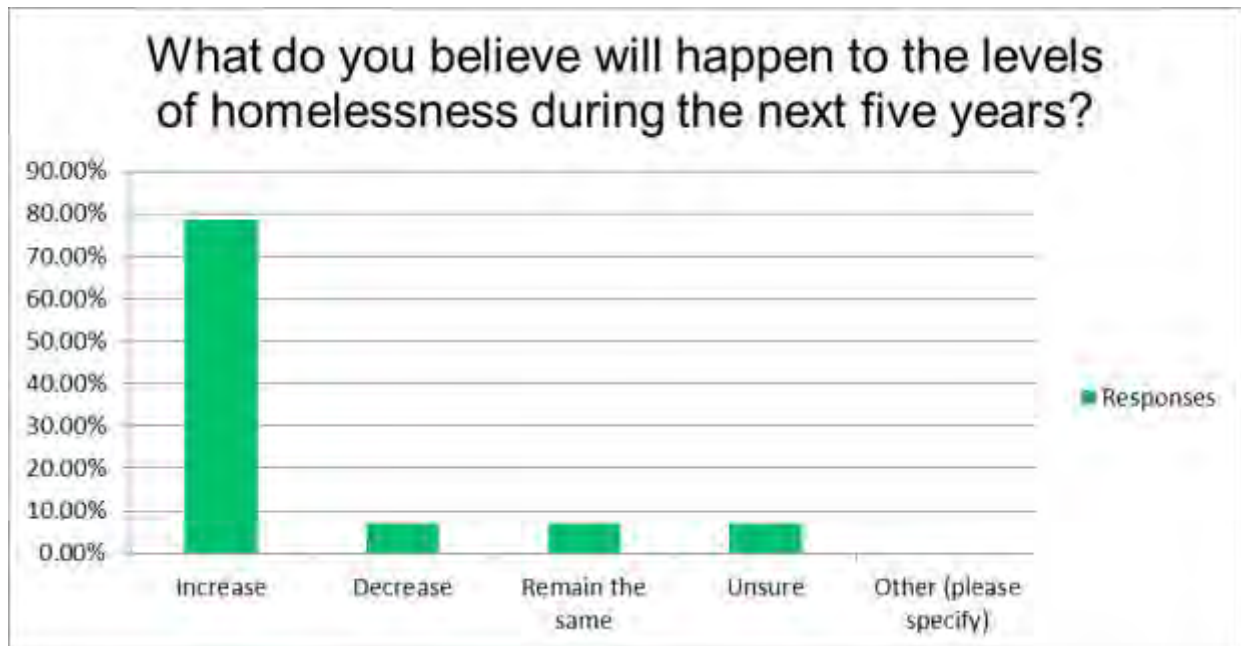
46% of respondents were from voluntary organisations. The survey was made up of 9 questions and achieved a 100% response rate.



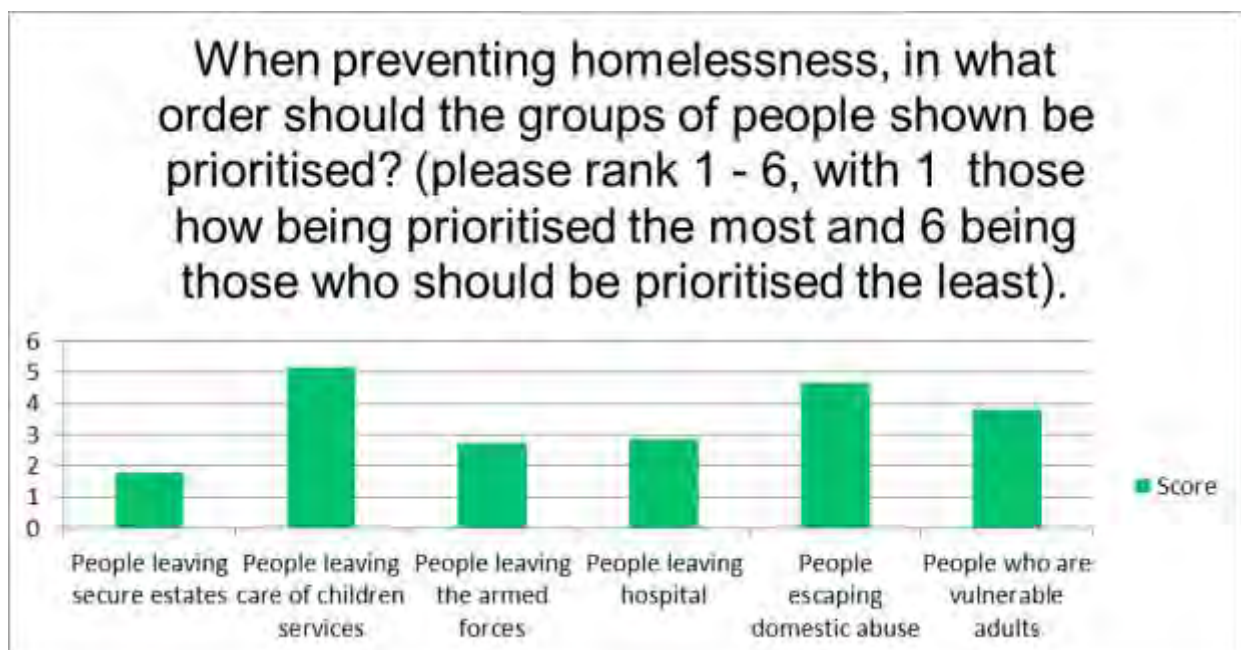
67% of respondents stated that they believed homelessness had increased over the last five years, 27% of respondents felt the level of homelessness had remained the same and 6% felt homelessness had decreased over the past five years.



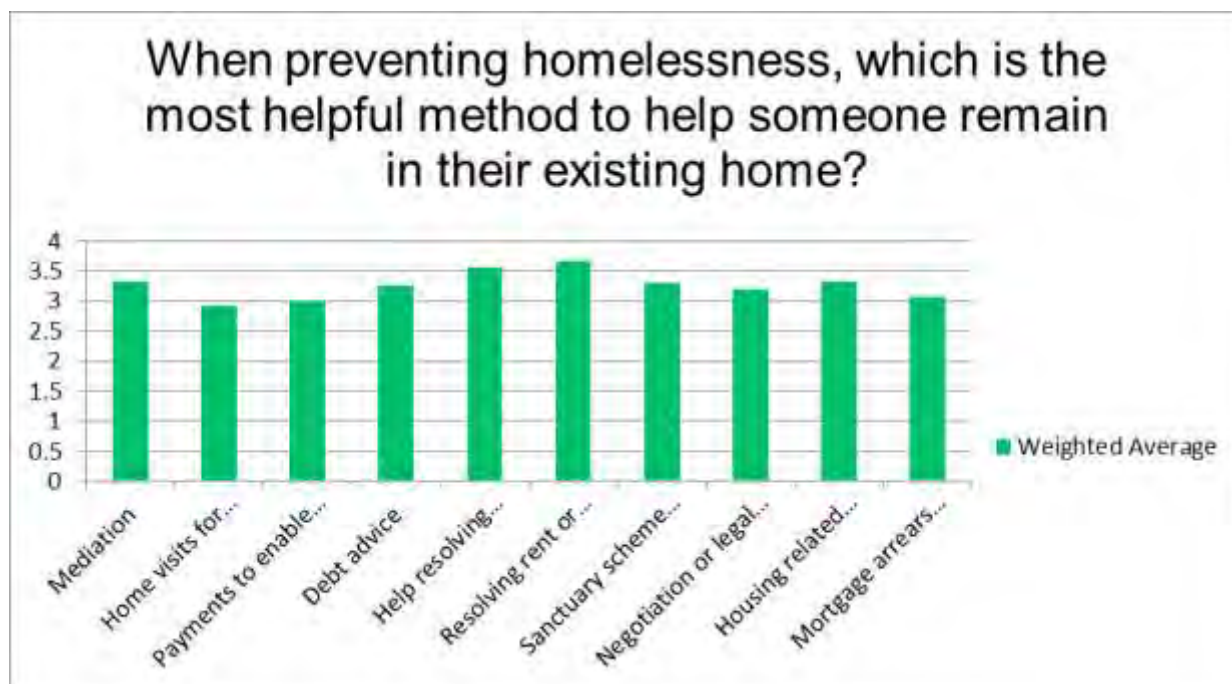
When asked what they believed would happen to the levels of homelessness during the next five years 79% believed levels would increase and 7% (1 respondent) were unsure, 7% felt numbers would remain the same and 7% believed levels of homelessness would decrease over the next five years.



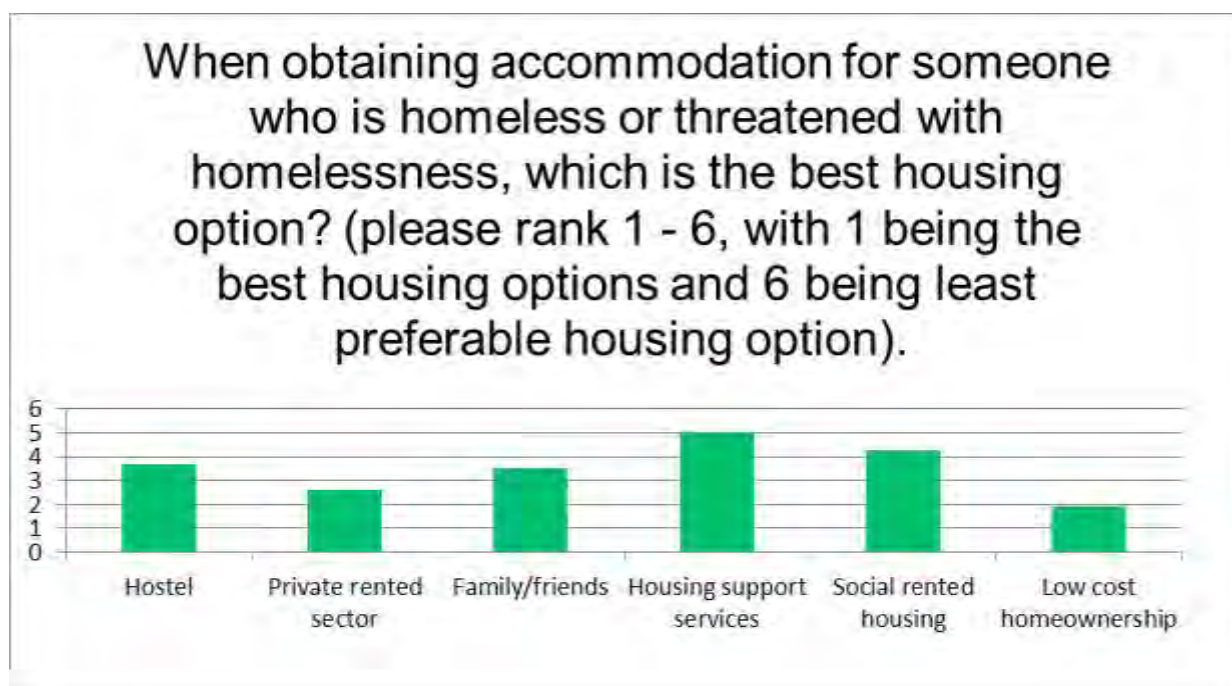
A question about which groups should be prioritised when preventing homelessness, resulted in people leaving care of children's services, people escaping domestic abuse and vulnerable adults receiving the highest ranking from respondents. Those leaving the armed forces and leaving hospital were ranked next. The lowest priority was given to those leaving secure estates.



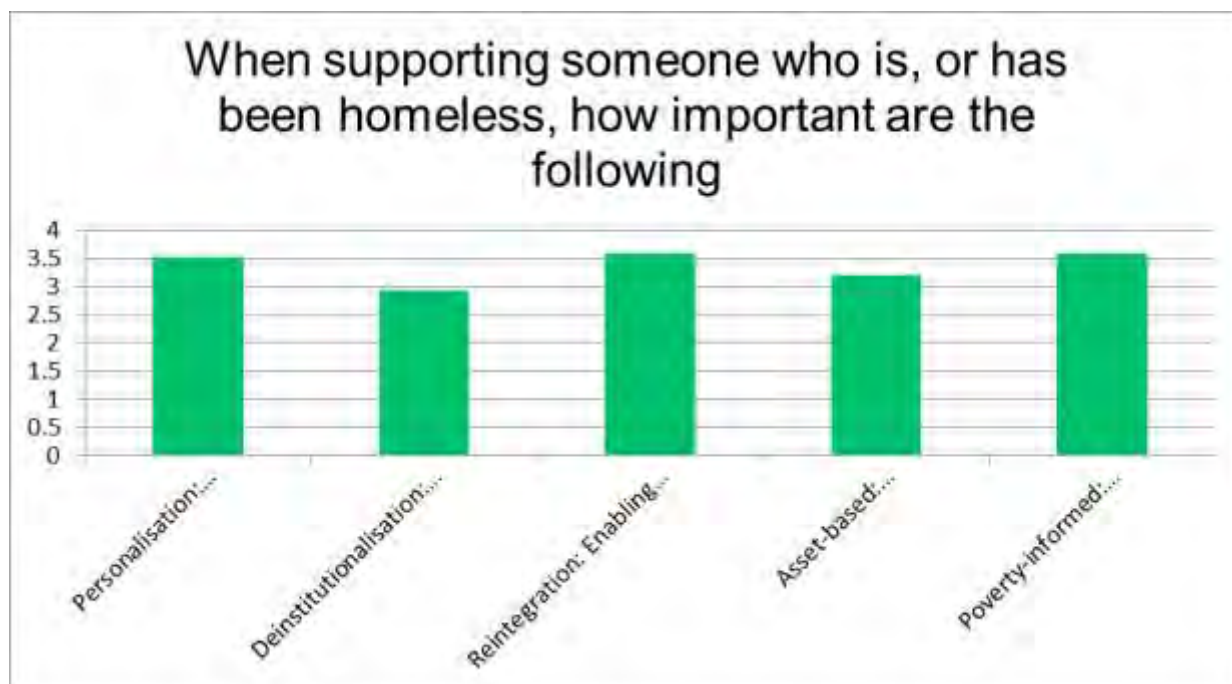
A question about the most helpful method to prevent homelessness, resulted in the wide range of prevention methods listed being weighted fairly equally by those who responded. This highlights the complexity of homelessness and array of prevention methods required.



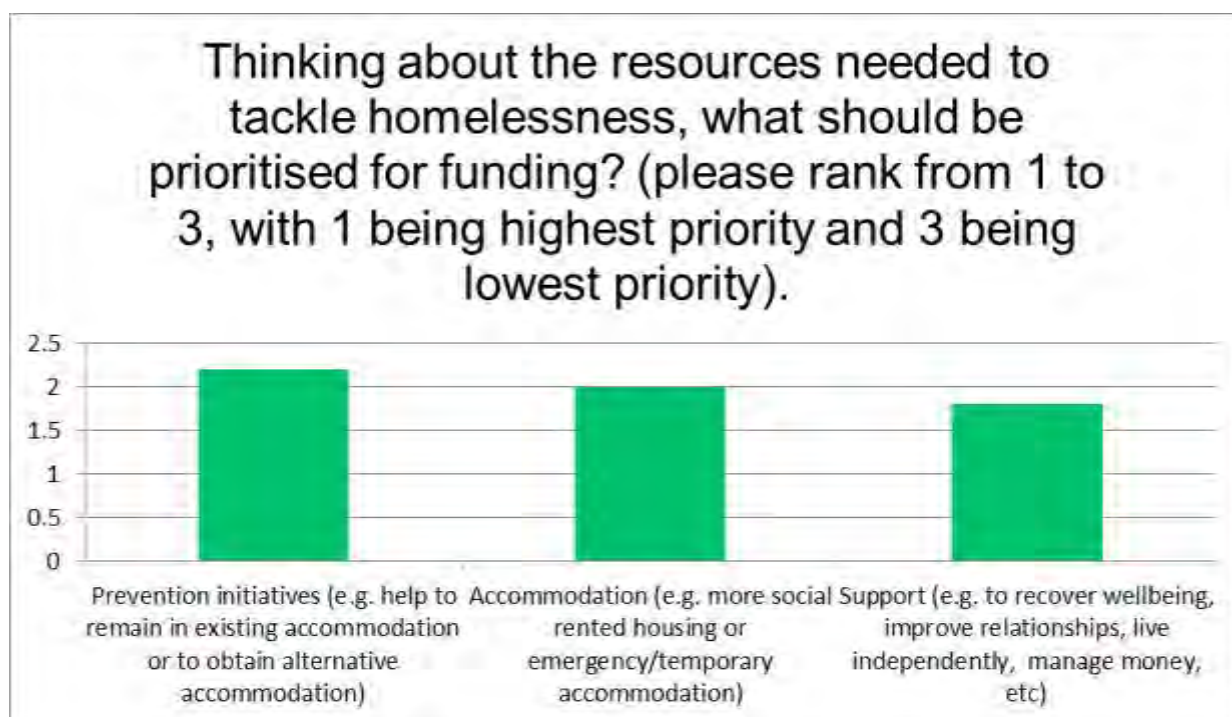
Housing Support Services were seen as the best housing option for someone who is or is threatened with homelessness. Social rented housing, hostels and staying with family and friends were ranked in the middle. Ranked equally low were accommodation in the private rented sector and staying with family.



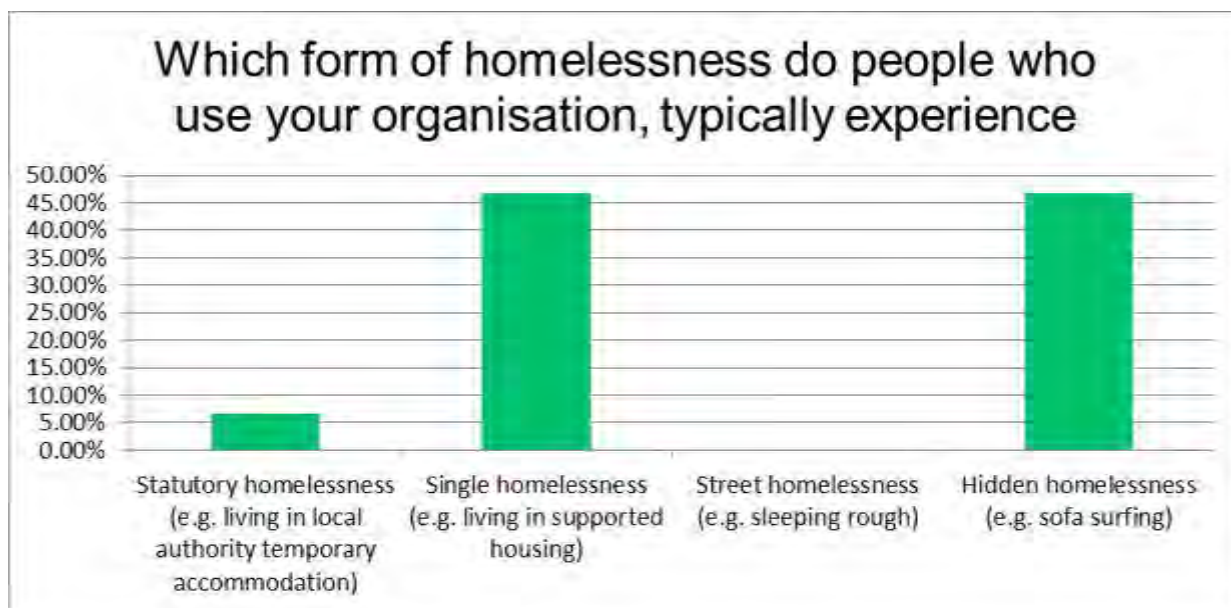
Respondents identified that dealing with issues around poverty, reintegration and personalisation as the most important factor when supporting those who are or have been homeless. Deinstitutionalisation and asset based support ranked marginally lower in comparison.



When asked what resources were needed to tackle homelessness 53% of the respondents ranked prevention initiatives and 40% ranked accommodation as the highest priority for funding. Overall support initiatives ranked the lowest in comparison.



Nearly half, 47%, of respondents were dealing with single homelessness and another 47% dealing with hidden homelessness. Just 1 respondent, 6% were dealing with cases of statutory homeless. Responding organisations are dealing with no cases of street homelessness.



7.3 Conclusions about consultation

The majority of service users and stakeholders (67%) believed that levels of homelessness had increased even though statistics collected by Eden District Council show that the number of persons becoming homelessness has reduced over the past five years (as reported in chapter two of this document). The majority of stakeholders thought homelessness levels would continue to rise over the next five years, aligning with the forecast we made in chapter two of this report.

Service users and stakeholders agreed that housing-led options, such as housing support services and social housing were preferred options above hostel accommodation. Service users ranked private rented housing as the top preferred option. This is reflective of the service user group. 50% of service users were single aged 25-44 years.

Service users felt help to find a home was the most important thing they needed support with, whereas stakeholders believed it was tackling poverty. This is reflective of the fact the poverty is the main cause of homelessness, as discussed in chapter two of this report.

Service users believed support to find accommodation was most important and that homelessness funding should be used to find more accommodation. Stakeholders felt that prevention of homelessness and funding to provide more social rented housing or emergency/temporary accommodation was a priority. The preference for this activity aligns with the fact that the majority of survey respondents were from public authorities, where prevention is already a common aspect of much public-sector policy.

8. Findings

This chapter re-visits the conclusions set out at the end of each chapter of the report. As a direct response to the conclusions are a series of recommendations, which the local authority can frame as actions for the next local homelessness strategy.

8.1 Conclusions

8.1.1 Levels of homelessness

1. More could be done with data held by local and national public authorities to identify people likely to be at risk of any form of homelessness by, for example, characteristic and/or electoral ward area. Interrogation of such data, held by the local authority, voluntary organisations and others, would help to inform the design and delivery activities for preventing homelessness, securing accommodation and providing support.
2. Levels of homelessness in Eden has reduced over the past five years reflecting an overall reduction in homeless decisions seen across five of the six Cumbrian districts. The number of households in Eden accepted as being homeless and in priority need is significantly lower compared to Cumbria, the North West and England. The levels of temporary accommodation in Eden has increased, however this remains relatively low compared to elsewhere, with a total of 24 households placed in temporary accommodation over the past five years. Half of people making an application for assistance are found to be eligible but not homeless (within the legal meaning of the term). The dominant characteristics of people applying for assistance are persons aged 25-44 years of age, of a white ethnic origin, who are a single male. Although the age and ethnicity of this profile is reflective of national trends, the statistics don't reveal why Eden has a number of statutory homeless single males. The however the high rate of acceptances for this group could explain why the levels of rough sleeping is very low.
3. Low rates of child poverty and high levels of employment will have a positive impact on the levels of homelessness. House prices and earnings are less favourable in Eden compared other areas, this is likely to have a greater impact on younger and single households, as their income levels and borrowing potential are typically lower than two-person and family households. These factors will have some negative causative effect on the levels of homelessness.
4. Taking account of the current levels of homelessness, alongside a range of predictive factors, the levels of homelessness in Eden are forecast to increase, albeit at a lower rate than across Cumbria, the North West and England. The expected increase will primarily be due to health-related factors such as relationship breakdown, mental illness, and substance misuse. A secondary driver for this predicted increase, is prevailing housing market factors plus the lower than typical levels of earnings.

8.1.2 Preventing homelessness

5. The extension of duties owed to persons who are threatened with homelessness from April 2018, means that Eden District Council now must ensure there are a comprehensive range of activities in place to prevent homelessness.
6. An improved system of evidencing outcomes from homelessness prevention activities needs to be put in place by Eden Housing Association. Efforts made by public authorities and voluntary organisations all need to be recognised.
7. Eden District Council's decision to contract out the administration of its homelessness functions, has resulted in a strong service offer from Eden Housing Association. There is a natural alignment between Eden Housing Association's core business of being a provider of social housing (for both rent and sale), and delivering housing advice services, as both activities are about making sure that everyone can get their housing needs met.
8. Eden Housing Association should continue collecting information on customer satisfaction for persons using the homelessness service, as this is another way to gauge the quality, effectiveness and value of the service being provided.
9. Consideration should be given to the homelessness service being provided from its own distinct housing advice centre, off-site from Eden Housing Association's main office.
10. For a district the size of Eden, there is a good array of housing advice services, delivered by a range of organisations, offering an efficient service. It is difficult to determine if there is any duplication between local service providers. A lack of evidence about the effectiveness of homelessness prevention action from housing advice providers hinders making future policy decisions.
11. Efforts to improve homelessness prevention activities for people leaving secure estates should be encouraged. Sufficient time and commitment must be made by both Eden District Council and national criminal justice agencies to establish a pathway that guarantees nobody leaves prison to no fixed abode.
12. Eden District Council and CuCC provide a range of homelessness prevention activities for people leaving care, these practices and protocols are very good.
13. A pilot project Eden District Council is jointly funding, has potential to prevent homelessness for armed forces personnel.
14. Preventing homelessness prior to discharge from hospital should comply with practices promoted by the Department of Health, a short-life joint working group should be established between the local authority housing services and local NHS bodies to transform local procedures.
15. Activities to tackle homelessness due to domestic abuse are excellent, logically this will be having a positive impact on the number of victims who become homeless or threatened with homelessness. However, there is little

read across from the community safety plan and the extended duty to prevent homelessness. Outcomes achieved from domestic abuse commissioned services should be shared where relevant with those responsible for the forthcoming new local homelessness strategy.

16. Activities to prevent vulnerable adults from becoming homeless need to be developed between Eden District Council and CuCC, with better links being made between duties arising from the Care Act 2014 and Homelessness Reduction Act 2017. Specific interventions for those most at risk of homelessness (eg adults experiencing mental ill health) need to be developed, along the lines of those already in place for 16 and 17-year-olds at risk of homelessness.
17. Likewise, activities to prevent other persons more likely to become homeless, such as people with a substance dependency, committing criminal offences, or involved in sex work, all need to be developed, with primary responsibility being taken by the CuCC Director of public health along with the Cumbria Police and Crime Commissioner, supported by Eden District Council.
18. Eden District Council/Eden Housing Association is reliant on a small number of initiatives to carry out pre-crisis homelessness prevention activity. Local prevention rates are lower than those regionally or nationally, which is consistent with the lower levels of and acceptances, temporary accommodation usage and rough sleeping. Locally, there is a greater emphasis on helping people to obtain alternative accommodation, compared to helping them to remain in existing accommodation, whereas nationally, there are slightly more outcomes being recorded for the former method. This might be due to local housing market factors, but equally this could be due to a lack of sufficient pre-crisis homelessness prevention initiatives.

8.1.3 Securing accommodation

19. The increase in households becoming homeless at home needs to be investigated, to understand why this has risen in recent years, whether it is providing good outcomes for applicant households.
20. Eden Housing Association need to continue to grow and diversify the portfolio of temporary accommodation as required, to ensure suitable dwellings are available to households who are owed an accommodation duty.
21. Eden District Council need to publish policies for procuring and allocating temporary accommodation.
22. Consideration should be given to extending private sector leasing arrangements for procuring temporary accommodation, to obtain accommodation for discharging homelessness duties.
23. Although B&B use is low, Eden District Council and Eden Housing Association should set a target to ensure all types of households do not remain in this form of temporary accommodation for any longer than one week.

24. Housing associations should be encouraged to demonstrate how they fulfil the duty to co-operate with Eden District Council, in administering homelessness duties.
25. More accommodation is needed for single person households.
26. It is important to recognise that Eden Housing Association is able to help all households move-on from with temporary accommodation with six months.
27. A comprehensive range of initiatives is needed to carry out homelessness relief casework. The lack of relief activity will result in people continuing to experience street or hidden homelessness for longer than they otherwise would have to.
28. Evidencing the case work outcomes from relief activity will be crucial to demonstrating the success of Eden Housing Association's activities for advising and assisting homeless households.
29. Increasing access to PRS accommodation to discharge any homelessness duty, will make the best use of the private rented sector. Better alignment is needed between PRS enforcement work, plus the Empty Homes Strategy, to local priorities for tackling homelessness.
30. Eden District Council/ Eden Housing Association should progress the creation of a social letting agency.
31. The existing cooperation between with housing benefit administrators should continue.
32. More social rented housing is needed in district, especially in key market towns.
33. When the Tenancy Strategy is next modified, a review should take place of any early warning systems established between housing associations and Eden District Council, to prevent homelessness from fixed term and affordable tenancies coming to an end, or an occupant not being granted succession or assignment.
34. More clarity is needed about the number and proportion of housing allocations made to homeless applicants (including those owed a homeless duty).
35. Prior to re-tendering for the administration of housing allocation functions, Eden District Council should complete an appraisal to determine whether the best option is to continue contracting-out to a third-party supplier.
36. Separately, Eden District Council should carry out a review to decide whether remaining a member of Cumbria Choice is the best option for the Council.
37. Alterations need to be made to the Cumbria Choice scheme, in relation to how the policy is framed regarding homeless households (including those owed a homeless duty). More generally, the policy doesn't take account of law, statutory guidance, plus regulations and orders that have come into force, since the last alterations were made in 2016.

8.1.4 Providing support

38. Given the prevalence of families who become homeless, strategic and operational links must be made between activities for tackling homelessness at the district level, and efforts to assist troubled families at the county level.
39. Given the presence of children who are members of homeless households, awareness raising about the causes and solutions to homelessness should take place in schools.
40. An external evaluation should be carried out on the work done by CDAP, for victims of domestic abuse, to establish the future of this project beyond its fixed-term.
41. Research should be commissioned to investigate why the rates of homelessness due to domestic abuse are significantly higher in Eden compared to those nationally. Targeted support is needed for people at risk of eviction from the PRS.
42. Given the low number of people who receive support, compared to those who apply for it, Eden District Council would benefit from an up-to-date housing support needs and gap analysis, to better understand CuCC's commissioning decisions. Furthermore, clarity is needed on CuCC's vision, values, strategic objectives and broader framework, including how the priorities of Eden District Council's homelessness strategy will inform commissioning decisions.
43. CuCC could share more intelligence about service provider and service user outcomes with Eden District Council, beyond the data about planned move on.
44. Given the mixed feedback about the supported housing central access point, Eden District Council should seek to collaborate with CuCC, to understand what works well and what could work better.
45. Opportunities to align the commissioning of domestic abuse housing support, to CDAP should be explored.
46. Evidencing homelessness related outcomes being achieved by supported living scheme for vulnerable adults should be pursued by CuCC and Eden District Council. Eden District Council should suitably contribute to any service provider inspection CuCC carryout of support providers.
47. The emerging new initiative to support people who are experiencing street homelessness, will fill a gap in service provision. This programme should be subject to an external evaluation, to ensure successes are captured and disseminated, and the work can be sustained after the short-term funding has come to an end.
48. Information about support available from voluntary organisations (eg employment advice, food bank, credit union, etc) needs to be readily available for people experiencing homelessness.
49. Specific support should to be available for people experiencing hidden homelessness.

8.1.5 Resources

50. Achievements accomplished from expenditure of MHCLG funding must be evidenced to demonstrate how Eden District Council and Eden Housing Association are able to deliver more effective, better quality, and greater value outcomes for people who are homeless or threatened with homelessness.
51. Securing assurances of funding arrangements from April 2020 is essential. With homelessness levels forecast to increase during the next five years, current funding levels will need to be at least maintained, and ideally increased.
52. Securing a greater share of national funding opportunities, must be a priority for Eden District Council, key to success will be the countywide homelessness officers forum making successful bids.
53. Eden Housing Association's current staffing levels are likely to be adequate, with future levels of homelessness forecast to increase, the current number of employees will need to be retained. The additional burdens arising from the HRA17 has resulted in the increase of workloads, meaning more staff will be required, an additional part-time housing solutions officer should be sufficient.
54. Eden District Council must continue to ensure there is dedicated post for carrying out homelessness enabling, policy and strategy matters.
55. The updated IT software system will prove to be invaluable, creating time efficiencies for staff, as well as controlling the consistency and quality of the work of the team. Staff need to be able to use this technology offsite, to allow more and better advice to be given.
56. The majority of service users and stakeholders (67%) believed that levels of homelessness had increased even though statistics collected by Eden District Council show that the number of persons becoming homelessness has reduced over the past five years (as reported in chapter two of this document). The majority of stakeholders thought homelessness levels would continue to rise over the next five years, aligning with forecasts we made in chapter two of this report.
57. Service users and stakeholders agreed that housing-led options, such as, housing support services and social housing were preferred options above hostel accommodation. Service users ranked private rented housing as the top preferred option. This is reflective of the service user group. 50% of service users were single aged 25-44 years.
58. Service users felt help to find a home was the most important thing they needed support with, whereas stakeholders believed it was tackling poverty. This is reflective of the fact the poverty is the main cause of homelessness.
59. Service users believed support to find accommodation was most important and that homelessness funding should be used to find more accommodation. Stakeholders felt that prevention of homelessness and funding to provide more social rented housing or emergency/temporary accommodation was a priority. The preference for this activity aligns with

the fact the majority of survey respondents were from public authorities, where prevention is already a common aspect of much public-sector policy.

8.2 Recommendations

8.2.1 Levels of homelessness

1. Eden District Council should provide an annual report about the delivery of local homelessness strategy, to the Council's executive, to ensure accountability for accomplishing local objectives for tackling homelessness.
2. Eden District Council should undertake periodic inspections of Eden Housing Association's own homelessness service, to ensure it represents best value, is efficient in the administration of its statutory duties and offers quality advice and assistance. The inspection should focus on the following themes:
 - a. Accessibility of advice and assistance
 - b. Diversity of local population catered for in service delivery
 - c. Homelessness prevention, housing advice and options
 - d. Administration of homelessness applications and decisions
 - e. Temporary accommodation procurement and management
 - f. Making best use of resources
3. Eden District Council with cooperation from other public authorities, should adopt the practice of completing a homelessness impact assessment, before any new policy proposals are endorsed, to ensure all local plans actively contribute to the reduction of homelessness, by way of tackling poverty, labour market factors or housing market factors.
4. Eden District Council, with cooperation from other public authorities, voluntary organisations and housing associations should undertake targeted early prevention work during the decade ahead in the wards with the highest levels of child poverty, to prevent today's six-year olds from becoming homelessness homeless at 16 years.

8.2.2 Preventing homelessness

5. Eden Housing Association should benchmark the range and success of activities in place to prevent homelessness, against those used by other Cumbrian local housing authorities.
6. Eden District Council should Introducing a monitoring system for capturing homelessness prevention outcomes achieved by Eden Housing Association, along with other public authorities, voluntary organisations, housing associations, and others.
7. Eden Housing Association should review all operational policies, procedures, and paperwork associated with administering the homelessness service should be reviewed in light of the new duties arising from the HRA17.

8. Eden District Council should carry out a comparison of administering homelessness duties in-house compared to contracting out, prior to next recommissioning the service, to have assurance that continuing to contract out is the best thing to do.
9. Eden Housing Association should carry out regular customer satisfaction consultation and publish the results.
10. Eden District Council/Eden Housing Association should carry out an options appraisal on from which location the homelessness service should be delivered from.
11. Eden District Council should establish a housing advice service forum, to foster better exchange of information on policies and practise between all agencies providing housing advice in Eden.
12. Eden District Council with cooperation from NPS and the CRC, should adopt a pathway to prevent homelessness for people leaving secure estates, akin to the one in already in force throughout Wales (this would benefit from being done on a countywide basis)
13. Eden District Council/Eden Housing Association with cooperation from CuCC should publish a case study demonstrating the excellent joint work between Eden District Council/ Eden Housing Association and CuCC, for young people leaving care, and assist those aged 16 and 17, who are at risk of becoming homeless.
14. Eden District Council (with cooperation from other relevant stakeholders) should commission an independent evaluation of pilot armed forces pilot project, to understand the outcomes achieved and inform future policy and funding decisions.
15. NHS Trusts with cooperation from Eden District Council, should adopting a pathway to prevent homelessness for people ready to be discharged from hospital, using the template protocol published by Homeless Link and endorsed by the Department of Health and Social Care.
16. Eden District Council with cooperation from CuCC and Cumbria Police should adopt a single strategy and integrated commissioning approach for tackling domestic abuse.
17. Eden District Council in cooperation with CuCC should align the duty to prevent homelessness found in the Homelessness Reduction Act 2017, with the duty to prevent social care needs, found in the Care Act 2014, by establish joint working arrangements, for advising and assisting vulnerable homeless adults.
18. The Director of Public Health, with cooperation from Eden District Council, should introduce activities to prevent homelessness among people who have poor health. This will minimise the impact on health services from people who are already experiencing homelessness, and enable improved health outcomes for people experiencing homelessness so that their poor health is not a barrier to moving in to, and sustaining a home of their own.

19. Eden Housing Association need to improve the range of pre-crisis homelessness prevention activities by introducing homelessness prevention initiatives that can help people to remain in existing accommodation.

8.2.3 Securing accommodation

20. Eden District Council should carry out a casefile audit of Eden Housing Association homelessness cases, to check the rational, legality and adherence to public law procedural requirements of homeless at home decisions.
21. Eden District Council/Eden Housing Association should undertake a strategic review on the type and location of temporary accommodation available to the local authority for discharging statutory duties, to ensure the provision is suitable and reasonable.
22. Eden District Council/Eden Housing Association should formulate policies for procuring and allocating temporary accommodation, to ensure the approach taken satisfies suitability regulations.
23. Eden District Council should carry out an options appraisal for extending the current private sector leasing arrangements, to ascertain if more PRS accommodation could be obtained to discharge interim, prevention, relief and main homelessness duties.
24. Eden District Council should make a pledge that no household, regardless of its formation, will be placed in B&B accommodation for more than one week (seven nights).
25. Housing associations should undertake a peer-led benchmarking exercise to better demonstrate how they are cooperating with Eden District Council to discharge homelessness duties.
26. Eden District Council in cooperation with housing associations and private landlords, should formulate a plan showing how the supply of affordable one-bedroom accommodation will be increased.
27. Eden District Council/Eden Housing Association should publish a case study showing the positive practices used to help households in temporary accommodation, move on with six months.
28. Eden District Council/Eden Housing Association should develop a comprehensive range of homelessness relief initiatives, to help discharge the new relief duty that has commenced following the enactment of the HRA17.
29. Eden Housing Association/Eden District Council need to collect statistical and empirical evidence about the case work outcomes achieved from carrying out homelessness relief activities.
30. Eden District Council should formulate PRS strategy, that will enable the local authority to work with PRS landlords, to maximise the potential of the PRS, especially in respects of improving standards of accommodation and bringing empty homes back into use.

31. Eden District Council, in cooperation with housing associations and PRS landlords, should carry out an options appraisal, to identify there would be any interest and benefit for creating a social lettings agency.
32. Eden District Council/Eden Housing Association should build on existing cooperation with housing benefit administrators, by ensuring:
 - a. There is a named officer based in the housing benefit team who can provide a same day response to Eden Housing Association's homelessness service
 - b. A protocol has been agreed on how discretionary housing payments can be used to prevent and relieve homelessness
 - c. The housing benefit team provide an annual training update on housing benefit regulations
 - d. Eden Housing Association's homelessness service is able to verify evidence submitted for a housing benefit claim
33. Eden District Council, in cooperation with housing associations, should formulate a strategy, what sets out how the supply of social rented housing will be increased.
34. Eden District Council should carry out a review of the local Tenancy Strategy, then carry forward the findings to formulate a new tenancy strategy. The should review include an appraisal of early warning systems used to prevent homelessness when tenancies are coming to an end.
35. Eden District Council in cooperation with Cumbria Choice, should alter the performance measurement and monitoring the housing allocation scheme, to improve the understand of how housing register applicants who are homeless allocated social rented housing.
36. Eden District Council should carry out an options appraisal of costs associated with contracting out the administration housing allocation, compared to in-house delivery.
37. Eden District Council should carry out an options appraisal on whether to continue having a common housing allocation scheme via Cumbria Choice.
38. Eden District Council with cooperation from Cumbria Choice, should carry out a review of the housing allocation scheme, to ensure the procedures reflect current law and statutory guidance. This should consider whether current priorities for allocating social rented housing, are enabling those who needs cannot be met by the commercial housing market, to be given sufficient preference for an allocation.

8.2.4 Providing support

39. Eden District Council with cooperation from CuCC, should explore how early help services can be more closely aligned with the work of the local authority's homelessness service to support families experiencing statutory homelessness.
40. Eden District Council with cooperation from CuCC, should ensure homelessness awareness is taught in primary and secondary schools.

41. Eden District Council with cooperation from other CDAP partners, should commission an external evaluation of CDAP, to identify outcomes and inform future commissioning decisions.
42. Eden District Council with cooperation from CuCC, should commission research to understand why homelessness due domestic abuse is more prevalent locally than compared to national rates.
43. Eden District Council with cooperation from CuCC, should complete a supported housing needs and gap analysis, to better understand whether current provision reflects needs of actual and potential users who are homeless or threatened with homelessness. The conclusions should be carried forward to formulate a new supported housing strategy.
44. Eden District Council with cooperation from CuCC, should agree on alterations required to better understand the performance of service provider and user outcomes regarding support for people who are homeless or threatened with homelessness.
45. Eden District Council with cooperation from CuCC, should carry out a review of central access point, to understand how, if any, improvements can be made.
46. Eden District Council with cooperation from CuCC, should align the commissioning of housing support for victims of domestic abuse, with CDAP, and other domestic abuse funding, as part of a local strategy for tackling domestic abuse.
47. Eden District Council with cooperation from CuCC, should agree a method for carrying out performance inspections of housing support services that benefit people who are homeless or threatened with homelessness.
48. Eden District Council with cooperation from other local housing authorities, should commission an external evaluation of the new initiative to support people who are experiencing street homelessness, to inform future policy and funding decisions.
49. Eden District Council should publish a local directory of information, advice and assistance available for people who are homeless or threatened with homelessness.
50. Eden District Council with cooperation from other local housing authorities, public authorities, voluntary organisations, housing associations and others, should gather evidence on extent of hidden homeless, and use the information to commission specific advice and assistance.

8.2.5 Resources

51. Eden District Council should introduce more comprehensive performance monitoring of homelessness grant expenditure, to evidence the outcomes being achieved from this funding.
52. Eden District Council should ensure that spending on administering its homelessness duties is aligned to the levels of homelessness, plus committing that existing grant funding awarded by MHCLG will be

maintained by the Council for the lifetime of this strategy, should these funding streams cease or be reduced after 2020.

53. Eden District Council in cooperation with other Cumbrian local housing authorities, should review countywide working arrangements, to maximise opportunities for successfully bidding for additional revenue funding from MHCLG and other national funding bodies.
54. Eden District Council/Eden Housing Association should review the existing staffing levels and structure within the next five years, or after immediately after any further legislative changes, to ensure it remains fit for purpose.
55. Eden Housing Association should ensure all staff get an annual update on homelessness law, along with facilitating opportunities to learn and enhance skills and knowledge to provide housing advice and homelessness assistance.
56. Eden District Council should continue to have specific post to oversee the delivery of the local homelessness strategy.
57. Eden Housing Association should equipped their employees with IT hardware to allow them to work in a more agile way. This will foster opportunities to take the homelessness service into key locations where other public authorities provide services to those who are more likely to be at risk of homelessness.

Appendices

Appendix One – Record of Contributors

The following organisations contribute evidence to this homelessness review:

- Barnardo's
- Castle and Coasts Housing Association
- Citizens Advice Carlisle and Eden
- Cumbria County Council
- Cumbria Police
- Department for Work and Pensions
- Eden District Council
- Eden Housing Association
- Home Group
- Impact Housing
- My Space Housing
- National Probation Service
- Riverside
- Salvation Army
- Turning Point

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