FULFILLING LIVES
South East Partnership

Out of Area Accommodation Placements:

looking at local practices in Brighton & Hove, Eastbourne and Hastings and the impact on people with multiple and complex needs

2021

Contents

1. Executive Summary

In this report, Fulfilling Lives South East has analysed and reviewed national and local policies relating to unsupported temporary accommodation and out of area placements. This topic came to our attention, following close working relationships with clients who have multiple complex needs and also through conversations more broadly with volunteers and those with lived experiences of services locally; it is an area that caused concern for the people we work with. Many have found out of area placements extremely challenging, and we have used this opportunity to better understand local strategies, policies and practice to understand how the areas we work in approach and manage such placements.

Summary of learning following this research:

- Brighton & Hove, Hastings and Eastbourne all have policies related to allocation of accommodation
- At the time of this research, we were able to locate a public 'Allocation of Temporary Accommodation Policy and Practice Document' for Brighton and Hove City Council, however, not for Eastbourne or Hastings local authorities.
- At the time of this research, only Brighton & Hove local authority allocations policy mention clearly out of area placements and when this will apply
- All 3 local homelessness strategies reference and discuss the needs of people with multiple and complex needs
- Hastings Borough Council's homeless strategy discusses most the concerns and plans to tackle the rising number of emergency and temporary accommodation placements.
- Challenges discussed in homelessness strategies across the 3 areas are similar: an increase in homelessness, private rented sector is very competitive and there is an increase in rental prices and a reduced pool of landlords wishing to lease property to the local authority.
- [National Homeless Advice Service's](#) 2015 guidance and the case of Nzolameso v Westminster give as useful national framework for this issue, however, at the time of this research, only Brighton & Hove allocations policy references this case.

Summary of reflections and recommendations following this research

- For people with MCN not to be placed out of area unless they have specifically requested it. If, in exceptional circumstances, MCN clients are placed out of area, for them to always be prioritised for a placement back in their local area.
- Temporary accommodation allocation policies and procedures should be available on all local authority websites alongside their general needs allocations policies.
- For local authorities to revisit the case of Nzolamezo v Westminster City Council to ensure recommendations from the Supreme Court guide local practice.
- For local authorities to embed definitions of MCN into their allocations policies to ensure strategic goals for this group of people are clearly represented in operational guidance.
- For local authorities to review the definition of medical needs and ensure the distinct medical and health needs of people with MCN are represented and considered.
- Cross county discussion on the topic of out of area placements to agree useful ways of working.

2. About Fulfilling Lives

Fulfilling Lives South East Partnership works across Brighton & Hove and East Sussex and is one of 12 projects across England where National Lottery Community Fund investment is supporting people with complex needs.

The purpose of this initiative is to bring about lasting change in how services work with people with multiple and complex needs and we collaborate with partners to work towards this objective. We are committed to putting co-production into practice and value the voices of experience. We also recognise the value of trauma informed approaches in our work and the work of others.

Multiple and Complex Needs ('MCN') are persistent, problematic and interrelated health and social care needs which impact on an individual's life and their ability to function in society. We consider a person to have MCN if they experience three or more of the following four issues:

1. Homelessness
2. Mental, Psychological and physical health problems
3. Drug and / or alcohol dependency
4. Offending behaviour

People with MCN are more likely to experience violence and abuse, including domestic abuse, live in poverty and have experienced trauma in childhood and throughout their lives.

Website: www.bht.org.uk/fulfilling-lives
Blog: www.fulfilling-lives-se.org

3. Context and data

Fulfilling Lives South East (FLSE) has witnessed numerous housing applications being made for our clients as well as changes in policy that impact housing options and pathways for people with multiple and complex needs (MCN). As the Covid-19 pandemic struck the UK in 2020, the UK Government endorsed an 'Everybody-in' scheme and in doing so, it has shown that homeless people can be accommodated very quickly in a safe and supported way. 2021 is a time to consider how support systems re-set and form as the immediate risks of the pandemic reduce, taking in to account learning from the pandemic response and emerging local needs.

As the Covid-19 pandemic struck the UK in 2020, the UK Government endorsed an 'Everybody-in' scheme and in doing so, it has shown that homeless people can be accommodated very quickly in a safe and supported way. In this report, we will focus on analysing and reviewing national and local policies relating to unsupported temporary accommodation and out of area placements, which links to our commitments for change in the FLSE Manifesto for Change. This report highlights some of the local policies and practices for this form of accommodation and provides recommendations on how local practice may be developed to better support people with MCN.

3.1 A national overview- a short history of Housing Legislation

The UK government has written and revised a variety of homelessness legislations. Part 7 of the Housing Act 1996, is the primary homeless legislation and it provides the statutory under-pinning for action to prevent homelessness and provide assistance to people threatened with or experiencing homelessness. In 2002, the government amended this legislation through the Homelessness Act 2002 and the Homelessness (Priority Need for Accommodation) (England) Order 2002 to promote a

more strategic approach and to extend priority needs categories. It was the [Homelessness Reduction Act 2017](#) which further reformed the legislation and it placed greater duties on local authorities to intervene at early stages to prevent homelessness.

In addition, the government, as part of the [Homelessness Act 2002](#), required local authorities to have a homelessness strategy in place, including a plan for prevention of homelessness and to secure sufficient accommodation and support.

The Homeless Reduction Act 2017 also helped outline how a referral by one local authority can be made to another local authority where the first authority feels that the applicant has no local connection and a connection to another area.

### 3.2 The South East and the Covid-19 Pandemic

The shortage of housing is particularly acute in the South East of England. The increasing demand and competition for private rented accommodation and landlords' increasing reluctance to accept Universal Credit tenants, has reduced housing options for people with complex needs. With the growing numbers of homeless people, this supply crisis has increased local authorities' pressure to source and provide temporary accommodation. This has led to a higher number of people with MCN being placed in unsupported interim housing, including out of area placements and they are remaining in this accommodation for more longer periods of time.

When people housed in unsupported accommodation, this frequently ends in the sequence whereby their temporary accommodation arrangement get cancelled, and the clients return to homelessness.

According to [Crisis' The Homeless Monitor: England 2021](#), the Covid-19 pandemic *"has further exposed England's severe shortage of affordable homes. A majority of councils surveyed said it had become harder to place homeless households in both social rented and private rented sector housing during the pandemic."* There has been an increasing demand and competition for private rented accommodation.

According to [Crisis](#) (page 65), Core Homelessness in England is steadily increasing:

Figure 5.1: Core homelessness estimates by category and year, England 2012-2019
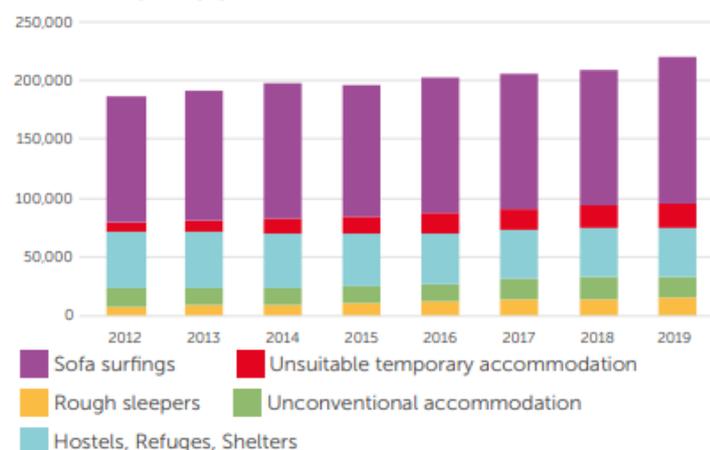
Source: Authors estimates of core homelessness elements from sources listed in Table 5.2 and described more fully in Appendix 3.

With this increase in number of people being homeless either as families or individuals, the pressure on local authorities to source and provide suitable temporary accommodation has increased too.

In March 2020, at the start of the Covid-19 Pandemic, the UK Government invested £3.2 bn in local councils to house their rough sleeper populations. As Homeless Link suggested, this scheme was a huge success but Crisis suggest that local authorities expect an increase in homelessness post-lockdown. Approximately 15,000 people were rehoused in emergency accommodation by the Local Authorities nationwide. According to Shelter's press release in October 2020, almost 100,000 homeless households were living in temporary accommodation during the first national lockdown in March 2020, which was an unprecedented increase of 7% in just three months (a total increase of 14% in a year).

Following the Homeless Reduction Act 2017, the Government allocated the responsibility to Local Authorities to assess, prevent, and relieve homelessness. Crisis summarised this Act's key changes as follows:

- People who are homeless or might lose their homes can get advice and information that is more specific to their situation free of charge.
- People who are homeless or might lose their homes can get help earlier if they are going to be homeless.
- Local councils have new duties to help stop people from losing their home or help them to find somewhere to stay if they are homeless.

3.3 FLSE's data – why look at out of area placements?

In the last seven years, FLSE has supported people with MCN to get access to suitable housing. Unfortunately, we have observed people experiencing MCN to be placed in unsupported interim housing, including out of area placements. FLSE has seen trends in client data that over half of temporary accommodation placements broke down and that out of area placements were offered by local authorities to our client group 20% of the time.

Case example:

B is a male with unmanaged HIV who is alcohol dependent. B has been placed out of area and as a result he is unable to access community detox through the community substance misuse service in his local area. The client is at high risk of death due to his level of alcohol abuse. This cannot be managed through assertive outreach due to B being placed out of area. Being placed out of area also adds a barrier to possible engagement with the specialist HIV treatment centre in his local area to explore better management of his HIV

FLSE clients have had to make 'impossible' decisions between receiving the support they need or accepting accommodation out of area. FLSE clients have often refused out of area placements in order to access their support networks locally; rather than face the isolation of being placed away from support services, they have slept rough.

A recent data snapshot suggests the following[1]:
- 68% of our clients made homeless applications.
- 49 applications were completed, of which 35 placements were offered and accepted but 20 (57%) of those 35 broke down. This leaves a success rate of 15 placements.
- **1 in 5 (20%) placements offered were out of area**. Only 10% were taken up.
- 30 offers were made in the clients' local areas.
  Less than half successfully transitioned to a more permanent arrangement (whether supported by the housing, a private tenancy, or a social housing tenancy).

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[1] Fulfilling Lives South East *Manifesto for Change*, p.33

Further, 57% of placements broke down due to failure to comply with the accommodation providers license agreement and expectations.

- In comparison, 20% of homeless applications resulted in no offer, either due to being assessed as non-priority or being found intentionally homeless.

Our observation and analysis of national and local policies has led to identifying gaps in allocation policies within the local areas of Brighton & Hove, Eastbourne and Hastings. It also helped bring to light some solutions on how to improve homeless housing for those with MCN.

Case example:

J is a female client with long term unmanaged mental health problems who is known to MARAC (Multi-Agency Risk Assessment Conference, where agencies discuss high risk domestic abuse cases) and who needs safe accommodation. After intensive FLSE input, J engaged with mental health services in Brighton. She was told she was going to be placed out of area. She was then told that the mental health service could not support her out of area. J had to make a choice between receiving mental health support or having a safe place to stay. J reported that she was so desperate to be placed and to have her own space that she considered accepting out of area accommodation. Ultimately, she decided to turn down the placement in order to continue to receive mental health support

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3.4 Research method

FLSE carried out this review of local policies and procedures in Jan-Aug 2021 and research was primarily conducted via online desk-based activity to identify. The research was led by a Brighton University Social Policy student on placement with the FLSE team. The research also incorporated a review of FLSE client case studies and data to draw out the experiences of people with lived experience of out of area placements into unsupported temporary accommodation. We also carried out a focus group activity in an internal FLSE project group meeting with staff and volunteers with lived experience to gather views on the policy research and have threaded this feedback through the report conclusions and recommendations.

This report will now take an in-depth look into the how the local areas FLSE works in approach emergency and temporary accommodation placements, what is said about out of area placements in local policy and reflects on the experiences of people with MCN who have been offered or placed in out of area placements.

4. Allocation Policies – with a focus on 'out of area' placements

Allocations policies provide local authority teams with a framework for assessing and responding to people's needs when they present to ask for help with housing. These policies define the 'bands' / categories of priority needs and the corresponding housing support offer for each 'band'/category.

'Out of area' placements can be issued following a housing assessment to identify the 'band'/category someone is then placed in and is also influenced by the availability and localities of housing stock.

The National Homeless Advice Service's 2015 report on 'Placing homeless households out of area: local authority guidance and best practice' underpins 'out of area' approaches to ensuring that accommodation for homeless households is suitable by following the best practice below:

> ## The best practice for local authorities is summarised as follows:
>
> ✓ Notify host local authorities
> ✓ Maintain contact with households placed out of area
> ✓ Ensure thorough suitability screening, including across other local authority services
> ✓ Accommodate in-area while suitability is properly assessed
> ✓ Give greater flexibility for families on location of out of area accommodation
> ✓ Employ a housing officer where there is a high concentration of out of area accommodation
> ✓ Equip families with complete information on their new area
> ✓ Check the suitability of school and nursery places in new area
> ✓ Provide support with travel and removal costs
> ✓ Conduct an equalities impact assessment for each move
> ✓ Ensure households are aware of their right to review

In 2015, a Supreme Court ruling brought greater attention to 'out of area' placements. In 2012, Titina Nzolameso, a single mother of five children, was evicted from her home in Westminster. She applied to Westminster City Council under the relevant homelessness provisions for housing support, and in 2013, the Council offered her a house in Bletchley, Milton Keynes (approximately 50 miles away). Ms Nzolameso turned this offer down on the basis that she had already been a resident in Westminster, had ongoing health concerns, and did not want her children to have to change schools. Nzolameso took her case to the Supreme Court, and the Court ruled in her favour dismissing Westminster City Council's position that an offer of housing in Milton Keynes represented a suitable option for the family – criticising officials for failing to establish "how practicable" it would be for the family to move out of the area, and for failing to justify why the family had not been offered accommodation either in Westminster or as close by as possible. This case has impacted housing practice across the country and informed the good practice guidelines developed by the NHAS referenced above. Many local authorities subsequently reviewed and updated their allocations policies following this Supreme Court ruling.

The Supreme Court stressed that:
- distance from the home area is key. A homeless household should be placed as near to their previous home as possible
- decisions must be made on the basis of the needs of the whole household
- a child's welfare must be safeguarded and promoted
- an applicant must be given sufficient time to respond to an offer
- authorities must give reasons if offering out-of-area accommodation.

This report will now look at the local authority policies on this topic.

4.1 Brighton and Hove

The housing and homelessness policy context in this area:

In Brighton and Hove ('B&H'), the city's local authority has a variety of polices and strategies in place to address general housing and homelessness within the city.

The local authority stresses in its current homelessness strategy that everyone who is homeless should have: 'a safe, secure home, and if needed, an appropriate level of support to create a good quality of life' (Brighton and Hove Homelessness and Rough Sleeping Strategy 2020-2025).

Until 2020, the city had a Homelessness Strategy 2014-2019 and a Rough Sleeping Strategy 2016-2019 and these efforts are now brought under a new Homelessness and Rough Sleeping Strategy 2020-2025. The Brighton and Hove Homelessness and Rough Sleeping Strategy 2020-2025 sets out a strategic framework to inform citywide responses to homelessness and rough sleeping. Information and data had been collected to inform the strategy and one of the identified challenges is multiple and compound needs and rough sleeping, stating: '*This group of people require greater levels of support to find a route off the streets, and can struggle to engage with services including Health & Adult Social Care, and Substance Misuse Services.*'

The latest strategy highlights a number of developments that the city has invested in to support people who are at risk or experiencing homelessness:
- *accommodation finding workshops established*
- *trailblazer funding awarded to trial new ways of working and intervening, to prevent homelessness at a much earlier stage*
- *1645 young people engaged with Prevention Workshops as part of the Trailblazer project, 95% reported improved knowledge engaged*
- *implemented service change in response to the Homelessness Reduction Act 2017*
- *1043 households were helped to move to the private rented sector*
- *personal Housing Plans introduced for those at risk of or actually homeless*
- ***Out of Area Temporary Accommodation Placement Policy adopted by Housing Committee***
- *Allocations Policy reviewed, 40% of social housing now allocated to statutory homeless*
- *nomination rights given to Adult Social Care to access social housing, increasing options for people who are ready to move on from supported accommodation*
- *the development of new services for people sleeping rough in the city, including those without a local connection to improve reconnection work 'No Second Night Out', 'Somewhere Safe to Stay', and a 365 day a year night shelter*
- *a successful bid to establishment a Social Impact Bond (SIB), as a means to fund the resolution or prevention of rough sleeping for a group of 100 people*
- *the establishment of the Multi-Disciplinary Rough Sleeper Navigator Team, an assertive outreach service working to end the rough sleeping of people with multiple and compound needs by working holistically, assertively and through the lens of trauma informed care*
- *the delivery of a cross-sector client database that prevents the re-traumatisation of clients by limiting the need for them to re-tell their story, and allows live tracking of client's journeys, and improved information sharing*
- *the ongoing delivery of dedicated primary health care services to homeless people, via Arch Healthcare*
- *a successful bid to expand our Housing First service, recognising the effectiveness and impact of the model*

- *a successful bid to expand the work of our dedicated third sector private rented scheme Umbrella, working with the Credit Union to increase access to housing in the private rented sector for people with a history of homelessness and rough sleeping*
- *the establishment of a cross sector partnership to co-ordinate a welfare first approach to the growing issues of unauthorised tent encampments*
- *an enhanced Severe Weather Emergency protocol offer with a lower trigger point*
- *the completed re-modelling and re-commissioning of our supported housing service offer, to establish psychologically informed environment models and better support positive change*
- *the delivery of a gender informed service for women with multiple and compound needs, and the establishment of a gender informed move on pathway for vulnerable women*
- *the development of a new risk and needs assessment process to better inform effective placements in supported housing and put the client's story at the centre of the assessment*
- *improved access to social housing for Housing First and older age adults leaving supported housing*
- *the development and implementation of a Homeless Mortality review process, to ensure that learning and improvement is captured and deaths are prevented*

This helps to illustrate the service landscape in B&H and sets in context the wider allocations policies. There are commissioned supported accommodation facilities across the City (600 units of supported accommodation), a growing Housing First provision and multi-disciplinary teams working to an assertive outreach model in the locality.

The current Strategy 2020-2025 highlights the financial challenge of trying to provide affordable housing in an increasingly expensive private housing market. The strategy states: *'the fact that affordability in the city is a growing issue, as the housing market continues to be out of the reach of average household… the gap between the average rent and Local Housing Allowance has increased from £306 per month or £70pw in 2013/2014, to £771 per month or £177pw in 2018/2019'*.

The city's Strategy 2020-2025 focuses on three building blocks: prevention, interventions and sustainability.
- *Prevention: Prevention is the best way to tackle homelessness and stop it from happening in the first place. It is both cost-effective and humane.*
- *Interventions: Interventions are required in a number of areas when homelessness can't be prevented, and to tackle issues such as rough sleeping, or issues that affect our communities of interest. There is no 'one size fits all' when it comes to interventions. At the heart of interventions is listening and learning from people with experience of homelessness or currently in services.*
- *Sustainability: Providing somewhere to live is not the end of the story. In order to succeed we need to make sure that the accommodation is sustainable for the household. This means that resettlement plans for individuals and households are in place. We also need staff to be able to work with people in a way that means that do not feel stigmatised or feel that they have failed if they ask for support. Therefore, it is key to have staff appropriately trained.*

Brighton & Hove - Out of area placements:

Brighton & Hove City Council ('BHCC') has both an 'Allocation of Temporary Accommodation Policy and Procedure Document' and a broader 'Housing Allocations Scheme and Guidance' both publicly available on its website. This was the only local authority we looked at who has written and published both that we could find at the time of conducting research for this report.

We noted that the Allocation of Temporary Accommodation Policy and Procedure explicitly references the Supreme Court case of Nzolameso v Westminster City Council and states the following:

The decision in a recent Supreme Court case, Nzolameso v Westminster City Council [2015] UKSC 22), held that where a local authority is unable to accommodate homeless households in its own local authority area it must have a policy agreed by elected Members that outlines the process of allocating housing out of the local authority area.

The Allocation of Temporary Accommodation Policy references the challenges of procuring accommodation within Brighton & Hove and states that out of area placements will be made in certain circumstances.

Below are the extracts for the policy that specifically relate to out of area practices:

1.3 As a result affordable temporary and emergency is increasingly difficult to procure within the city boundaries. BHCC, **procures accommodation outside of Brighton and Hove (but within, or immediately adjacent to, our broad rental market area** *– the area a person could reasonably be expected to live taking into account access to facilities and services as defined by the Valuation Office Agency) where the cost of housing is less than it is in the city.*
…
2. 1 The policy separates households requiring temporary accommodation into three main groups. There will be circumstances when it is appropriate to allocate outside of these categories and each case will be considered on its own merits.
…
2.3 Assessment of cases and procedure: It is important to note that a household's individual circumstances (i.e. the household's needs) must always be taken into account when making an allocation of temporary accommodation. This means factors such as the distance from B&H, any disruption caused to employment, education or caring arrangements, access to medical facilities and proximity to other amenities.
2.4 At point of contact Officers making a referral must consider;
- *Distance outside of the area*
- *Own Transport – including additional costs and the impact of these*
- *Public Transport*
- *Employment*
- *Children's schools, including availability of school places to transfer to in the new area, any statement of special educational need or educational health care plan, and whether any child is at a pivotal point of education, i.e. GCSE or A Level years.*
- *Medical Factors*
- *Other factors as raised by the applicant*

This Policy also sets out the bands (or categories) for allocating people into temporary accommodation. These are as follows:

Group A- where possible, <u>offered accommodation within B&H</u> (incl.people with a child in secondary school; people with a child with a care plan; people with a child subject to a Child Protection Order Plan; a carer; someone in permanent or settled employment who works anti-social hours and would risk losing their job if moved out of area; someone who received medical treatment provided by a specific facility within the city).

Group B- prioritised for temporary accommodation in adjacent districts within the range of one hours travelling distance on public transport (incl.people with their own transport; people with a child going to school in a neighbouring borough; someone receiving medical treatment provided by a specific facility only available in the city; someone receiving NHS treatment for mental health problems other than the GP and/ or Care Programme Approach).

Group C- all other homeless households would be offered temporary accommodation where the borough is able to procure it, provided it is suitable for the household's needs. This group can include a household where there is no local connection with the city.
Any referral will be assessed, categorised and checked by the council on multiple occasion before a temporary accommodation offer is being made.

We note that Group A is the only band where in-area temporary accommodation is offered.

Fulfilling Lives' reflections on the local strategy and policies with regards to out of area placements:

- The explicit reference to the Supreme Court case is useful. It is a clear indicator that the case and learnings from it have been given attention at a senior level and that learnings from this ruling have been absorbed into the City and the Court's recommendations acted on.
- The local authority's decision to write a dedicated policy for temporary accommodation placements feels appropriate given the growing number of placements locally and nationally into temporary accommodation spaces.
- The allocations policies are clear that out of area placements are part of practice when people are placed in temporary accommodation.
- The commitment in the local strategy to prevent and address homelessness is welcomed and we acknowledge that in the strategy and in practice services have been specifically commissioned locally to support people with multiple and complex needs/multiple and compound needs.
- Whilst the Strategy has many clear references to multiple and complex/compound needs the Temporary Allocation and General Needs Allocations Policies do not. We feel there is already a clear reference in local policy to this group of people as set out in the strategy and this should be carried across and represented in the local allocations policies as a way to ensure the needs of this group can be recognised and met.
- The local Strategy does not have an explicit strategic priority or action addressing out of area placements. We feel this would be helpful in light of challenges faced by people with MCN that highlighted the challenge people face when moved away from their support networks that are in the city.
- We would like to see people with MCN named explicitly in the 'Group A' category of the Temporary Accommodation Allocations Policy. A strengthening of the description around health needs could enable this: '*someone who received medical treatment provided by a specific facility within the city).'* For instance, including receiving support from the commissioned substance misuse service within the definition of *'medical treatment'* would be an inclusive approach to address the specific health needs of people with MCN.

4.2 Eastbourne

The housing and homelessness policy context in this area:

The local authority has a number of strategic and policy documents that address homelessness and either directly or indirectly touch on the issue of out of area placements. These include the Eastbourne Borough Council Homelessness Strategy 2017-2021, Eastbourne and Lewes Street Communities Strategy 2018-2021, Eastbourne Housing Strategy 2021-2021 and the Homes First Allocations Policy June 2018.

The [Eastbourne Borough Council Homelessness Strategy 2017-2021](#) acknowledges the growing challenge of homelessness locally: '*With some landlords moving away from the market and many people struggling to keep pace with these increasing rent levels, the number of people becoming homeless or finding themselves at risk has risen rapidly over the last two years and continues to rise.'*

The Strategy also reflects on achievements from 2013-18: *Over the last three years organisations working with homeless people in Eastbourne have:*
• *helped prevent 308 other households from becoming homeless through advice, conciliation; helped 16 households remain in their home with support our Mortgage Rescue Scheme; and helped 525 homeless households access private rented housing with financial support*
• *funded (ESCC) and delivered a range of supported housing, with funding from ESCC Adult Social Care, including 84 spaces for young people at risk (Eastbourne & Wealden YMCA and Eastbourne Foyer); 19 units for people with mental health needs; 9 units for people with complex needs; refuge accommodation for people and families fleeing domestic violence and abuse; 5 units for young mothers and their babies (SAHA); 5 rooms in shared housing for men with a history of rough sleeping (the Bridge project)*
• *funded (ESCC) and delivered a visiting support service for around 850 people aged 16-64 across the county who are at risk of homelessness (Home Works) and the Supported Accommodation and Independent Living Solutions (SAILS) service provides support to around 360 people with mental health needs and learning disabilities across the county.*
• *provided safe sanctuary-style accommodation and security works to their home for 21 people who have suffered domestic violence*
• *Funded and delivered a range of advice and financial services in partnership with ESCC Adult Social Care, BHT Eastbourne Advice, Eastbourne Citizens Advice, East Sussex Credit Union, Shinewater Shaftesbury Centre and Money Advice Plus*
• *Funded a Young Person's Housing Coordinator jointly with ESCC Children's Services and the other District and Borough Councils in East Sussex and worked with care leavers to minimise the risk of them becoming homeless* • *delivered a Schools Project, teaching school students about the realities of homelessness (Eastbourne & Wealden YMCA)*
• *Funded and delivered a range of services to rough sleepers including street outreach and day services (SHORE; St. Mungo Broadway; Salvation Army; Matthew 25)*
• *Piloted the Eastbourne Hub for rough sleepers and established a monthly hub enabling rough sleepers to access a range of services in one place*
• *worked with partners in Brighton and Hastings on the development of a Fulfilling Lives project exploring ways of improving services to people with multiple and complex needs*

As with many authorities in the South East, Eastbourne local authority is open about the challenges of the limited numbers of available housing they can use to house people, sharing on the Lewes District Council website the following: '*Our aim is to help you explore the wide range of housing options available to you. Not everyone is eligible to apply for social housing in the Lewes district or in*

Eastbourne. We do not have enough houses for all of the applicants on our waiting list, so it is important we help you make the best housing choice based on your own personal circumstances.

Each council has separate council housing stock and has separate waiting lists for their properties.'[2]

The strategic priorities set out in the local Strategy 2017-2021 are:

Provide a comprehensive homelessness prevention service: *Monitor trend and manage risks particularly in relation to market pressures and welfare reform; Ensure access to housing, legal, debt and money advice; Work with DWP to minimise risks of homelessness; Make best use of financial resources to prevent homelessness; Raise awareness of the risks of homelessness; Work with those people most at risk of homelessness including young people especially care leavers and those not in employment, education or training; those escaping domestic abuse; Work with partners in Children's Services, Adult Social Care and Health through Better Together to ensure appropriate housing and support services are available to people with health, care and support needs, including those with complex needs and others at risk; Continue working with rough sleepers and the agencies supporting them to achieve 'no second night out'; Increase awareness of services available to support people needing help with on-line applications and processes.*

Improve access to housing: *Enable housing development to meet the needs of homeless people and those at risk of homelessness; Work with development partners to increase access to private rented housing; Work with local private landlords and Registered Providers to protect and improve access to rented housing; Review policies on Council tenancies to make best use of resources; Review options for temporary accommodation in partnership with East Sussex County Council and neighbouring authorities and work with neighbouring Councils to reduce the time homeless households spend in emergency accommodation, to address problems accessing good quality temporary accommodation and to minimise the need to place homeless households out of area.*

The Strategy 2017-2021, makes direct references to people with MCN, including reference to the cost of homelessness - ***'****The costs of street homelessness can be particularly high as many street homeless people have multiple needs and some can become trapped in a cycle of ill health and offending'* – and a commitment to secure further funding to deliver support – *'We have bid for funding to continue work with rough sleepers and a key part of our Health and Housing work now covers homeless people with multiple needs.'*

This helps to illustrate the service landscape in Eastbourne and sets in context the wider Allocations Policy.

Eastbourne - Out of area placements:

With Eastbourne's Homelessness Strategy 2017-2021 there are a number of direct references to out of area placements and an aim to review and reduce the use of such placements. The strategy sets out the following under its strategic priority to 'improve access to housing':

*'Review options for temporary accommodation in partnership with East Sussex County Council and neighbouring authorities and work with neighbouring Councils to reduce the time homeless households spend in emergency accommodation, to address problems accessing good quality temporary accommodation and to minimise the need to place homeless households out of area.' (*p22)

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[2] Eastbourne Apply for housing - Lewes and Eastbourne Councils (lewes-eastbourne.gov.uk)

The strategy includes an Action Plan to set out the work the local authority will undertake to achieve its priorities and within this states the following actions:

'Work with neighbouring Councils to address problems accessing good quality temporary accommodation and to minimise the need to place homeless households out of area' and to 'Carry out a shared review of out of area placements identifying where these could be reduced. Liaise with neighbouring authorities to ensure the Council is notified of placements in Eastbourne.'

When looking at the local authority's Allocation Policy, we noted that the policy referenced on the website sign posts to the [Homes First Allocations Policy, June 2018](). This sets out a number of bands and categories for priority needs and placements, however, it is reserved for 'general housing' and not applicable to temporary accommodation placements.

This Housing Allocation Scheme sets out how people can apply for social housing in Lewes District. It sets out who qualifies to go on the Housing Register, how priority is given to Applicants with differing housing needs, and the procedures that are to be followed when applicants are selected to be allocated accommodation by the Council.

*This Allocations Scheme covers general needs housing and sheltered housing for rent. **It does not cover affordable home ownership schemes, placements of homeless households in Temporary Accommodation** or referrals to Extra Care, Supported Housing or other Specialist Housing which is allocated under separate agreements with relevant care and support agencies and service providers.*

At the time of our research into out of area policies and practice locally we were unable to locate a public document sharing the allocation procedures for Temporary Accommodation placements.

In the Homes First Allocations Policy, June 2018, the local authority sets out the priority bands:

Once housing need has been assessed, the Applicant will be placed into one of three Priority Bands and will be given a Priority Date which will be the date they applied to go on the Register or entered a Band. Applicants will also be assessed for the appropriate size of home they can bid for using the bedroom entitlement criteria set out in this policy.

The policy the outlines the following bands:
- *BAND A* - emergency or urgent priority*
- *Band A - very high priority*
- *BAND B – high priority*
- *BAND C – Standard Priority*
- *BAND C – standard priority - sheltered housing only*

This Policy does not directly reference people with multiple and complex needs nor out of area placements. The Policy suggests that homeless people will mostly be allocated in Band C.

Eastbourne Borough Council does have a publicly available factsheet on the website to give further information for people experiencing homelessness, called ['Factsheet: Applying for assistance with housing when you are homeless or threatened with homelessness](). This does make reference to out of area placements in relation to temporary forms of accommodation and states:

'If we believe a person is eligible, homeless and in priority need we will provide 'interim' accommodation for the household.
…

*Interim/Emergency accommodation: **If we provide interim or emergency accommodation for you, we cannot guarantee where this will be.** We have a limited number of accommodation providers that we use and will place you where there is a vacancy. If you do not accept an offer of accommodation and we are satisfied the accommodation is suitable, this will end our duty to secure interim accommodation for you. In interim accommodation you must keep to the rules and pay the fees you have been notified that you must pay. If you break the rules or fall into arrears without good reason, we may evict you from the accommodation and this will end our duty to secure interim accommodation.'*

Fulfilling Lives' reflections on the strategy and allocations policies and out of area placements:

- To complement the Homes First Allocations Policy, we feel it would be helpful to have the allocations policy for temporary or interim accommodation publicly available (we were not able to source this at the time of research). With the growth in emergency and temporary accommodation named in the local Strategy 2017-2021 and increased use of temporary accommodation in the local area, we feel this would be helpful and appropriate.
- The Factsheet sharing information about 'Applying for assistance with housing when you are homeless or threatened with homelessness' is clear that out of area placements may be made as part of interim/emergency housing placement practice.
- There are a number of references to people with multiple needs in the strategy but a detailed plan is not outlined for how the needs of this group will be met and supported and the potential overlap any support may have with placements into temporary accommodation. Instead the Strategy states the following as an area to 'focus on in the future':

Work with Rough Sleepers undertaken as part of the SHORE project has been effective but is at risk of being radically curtailed with the end of government funding for the project in September 2016. We have bid for funding to continue work with rough sleepers and a key part of our Health and Housing work now covers homeless people with multiple needs.

- We found no direct reference to the Supreme Court case of Nzolameso v Westminster in the Strategy or allocations policies and in light of the Strategy's action to review out of area placements, this may be useful to help provide further context for such reviews and demonstrate clearly the authority's recognition of the learnings that came from this case.
- Whilst the Strategy has a number of references to multiple and complex needs the Allocation Policy does not. We feel there is already a clear reference in local policy to this group of people as set out in the strategy and this should be carried across and represented in the local allocations policies as a way to ensure the needs of this group can be recognised and met.

4.3 Hastings

The housing and homelessness policy context in this area:

Like the other two locations, Hastings Borough Council ('HBC') also has a number of strategies and policies that address homelessness. This includes the borough's [Homelessness & Rough Sleeping Strategy 2019-23](#), the annual homelessness reviews and the [Hastings Borough Council Homemove Allocation Scheme 2018](#). The Strategy reflects less on achievements leading up to 2019 and instead sets out the findings of recent research into housing and homelessness issues and how the local authority plans to address and take action on these issues.

The strategic priorities set out in the local strategy are:
1) *Reduce rough sleeping*
   The strategy looks at the importance of specialist services, such as the Rough Sleeping Initiative (RSI), and the importance of multi-disciplinary working. There is also an aim to *'increase the range of short and long term housing solutions available for rough sleepers, including Housing First accommodation'.*

2) *Minimise our use of emergency accommodation by improving access to housing solutions*
   HBC share in the Strategy that the average length of time people spend living in emergency accommodation has increased and currently stands at 161.1 days and HBC set out an aim to *'increase the supply of affordable housing in both the social and private rented sectors'.* The local authority also set out to '*increase the number of council-owned emergency accommodation, expand the private rented sector leasing element of the Social Letting Agency*; and *Give financial support to homeless households to find new housing.'* Also, within this priority the local authority includes an aim to: *'Expand the different types of homes for people with multiple and complex needs, including helping people to move- on from supported housing.'*

3. *Adapt services to meet local needs*
   HBC highlight in the Strategy that key to keeping people in social or private rented housing is tenancy sustainment. The market has become more competitive and it's important to support people in their existing housing whenever possible. In partnership with other councils, the Connecting Hastings and Rother Together programme- Live, Work, Thrive - is providing specialist employability and tenancy sustainment training for homeless households and in this strategic aim HBC states it wants to: '*Develop links between homelessness services and specialist employability support.'* In this strategic priority, HBC also set out commitments to raise awareness of homelessness prevention and improving existing services to reduce homelessness and rough sleeping. Within this priority the local authority also set out an aim to: '*Use trauma informed working practices across homelessness services.'*

The Strategy highlights the local challenges the area faces in tackling homelessness and is very open in sharing concerns about the rising numbers of people in emergency accommodation and the increased time people are having to spend in these spaces. The strategy states:

Hastings continues to face challenges in its community. Almost 1 in 3 Hastings residents live in areas that are among the poorest 10% in England. Male life expectancy in Hastings is the tenth worst in England. Without good housing and homelessness services, the council will not be able to address the problems which are behind these trends. It acknowledges that homelessness levels are increasing and their goal to create an environment where people can lead independent lives:

'… *People are also spending longer in emergency accommodation before moving on to long term housing. This trend negatively affects the quality of life of households in emergency accommodation and has a significant financial impact on the council. The council has plans to reduce its use of emergency accommodation, but these plans will take at least another year to fully implement. **There is not enough supported accommodation locally, which often means that individuals with multiple and complex needs are placed in mainstream emergency accommodation**.'*

HBC's Strategy sets out publicly the most in-depth research in to, and actions plans to tackle, emergency and temporary accommodation and shared the local authority's findings on the factors causing the rise in the use of this interim accommodation in its Strategy 2019-23:
Some of the reasons for the increase in use of emergency housing are:
- Lack of affordable private rented accommodation.
- Landlords being reluctant to accept tenants with poor history of tenancy sustainment.
- Limited supply and low turnover of social housing.
- Clients with increasingly complex needs are accessing mainstream homelessness services due to funding cuts to partner services.
- 15% of people living in emergency accommodation have a diagnosed mental health condition.
- A lack of supported accommodation.

Waiting times for, and supply of, social housing is also highlighted as a challenge by the local authority in its Strategy: '*There are currently 1743 households waiting for social housing in Hastings, and waiting times are very long. The average waiting time is 537 days. Waiting times for family accommodation are much higher; families searching for a 2 bedroom house can wait up to 3 years for a property, even with the highest priority banding'.* And in the local authority's Allocations Policy this supply and demand challenge is stressed further: '*Demand for social housing in Hastings is greater than the number of homes available.'*

HBC's Strategy 2019-2021, have multiple references to people with MCN and discusses their needs and support options in the context of a growing temporary accommodation market. See below for direct extracts.

Hastings - Out of area placements:

Out of all 3 local area Strategies, HBC's most highlights the challenge of emergency accommodation and sets a strategic priority to reduce the use of this form of accommodation. The Strategy suggests that rather than placing people with multiple and complex needs in out of area accommodation, it first seeks to source supported accommodation spaces and failing that uses emergency accommodation in the town:

We've seen an increase in the number of individuals presenting to us with complex needs, such as:
• mental health issues,
• substance dependency
• anti-social behaviour
*These individuals are often made homeless following an eviction by a family member or friend, and have low levels of tenancy sustainment and independent living skills. **Because of the shortage of supported accommodation in the town, many are placed in mainstream emergency accommodation, which they struggle to sustain.***

The Strategy then moves on to outline an aim to expand accommodation provision within Hastings and pairing this with developed multi-agency support for people with MCN:

*'We will ensure that the need for new accommodation for this cohort is clearly understood in our local plan, which will be reviewed during the life of this strategy. This will enable us to support providers who are best placed to deliver **these services to expand in Hastings**.*
*When placements are made in mainstream emergency accommodation, it is vital that the right **tenancy sustainment support** is in place from the start. **This includes making use the community-based support services which are commissioned by East Sussex County Council.***
***We want to develop stronger links between homelessness support and local NHS services, Social Care, Probation and substance dependency services**.*
A new contract for community-based support services will be commissioned in 2020. We are now working with the county council and other partners to develop these new services.'

The local authority has an allocations policy available via the HBC website called 'Hastings Borough Council Homemove Allocation Scheme 2018'. This sets out a number of bands and categories for priority needs and placements, however, it is reserved for 'general housing' and not applicable to temporary accommodation placements:

From Appendix A of the Policy:
Accommodation not included in the Allocation Scheme
The Housing Allocation Scheme does not detail how the following accommodation will be allocated:
- ***Emergency accommodation for homeless households.***
- *Supported accommodation funded by East Sussex Supporting People Programme.*
- *Supported accommodation where people receive care and support in the home.*
- *Accommodation provided by the council's Social Lettings Agency*
The allocation of the accommodation listed above will be covered by protocols and service level agreements agreed with the landlord, commissioners and/or support providers.

At the time of our research into out of area policies and practice locally we were unable to locate a public document sharing the allocation procedures for Temporary Accommodation placements.

In the Hastings Borough Council Homemove Allocation Scheme 2018, the local authority sets out the priority bands:

This document explains the criteria we will use to prioritise applications for social housing and the procedures that will be followed. It also sets out who will and who will not be assisted, how to apply for housing and how homes will be allocated
…
Only people with an identified housing need seeking general needs accommodation or those seeking older person's accommodation can be added to the Homemove Scheme (Housing Register). When you are accepted onto the Homemove Scheme you will be put into one of four bands A, B, C or D based on your housing need.

The policy then outlines the following bands:
- *BAND A* – The criteria for this Band includes: *'Applicants who have unusually high ongoing accommodation needs, which cannot be met in the private rented sector. This category will only be used at the discretion of the council in consultation with support agencies.'*
- *BAND B*
- *BAND C* – The criteria for this Band includes: *'Applicants owed a duty by Hastings Borough Council under Section 193 of the Housing Act 1996 Part VII (as amended) living in temporary accommodation other than bed and breakfast accommodation.'*
- *BAND D*

This Policy does not directly reference people with multiple and complex needs nor out of area placements. The Policy suggests that homeless people will mostly be allocated in Band A or C.

Fulfilling Lives' reflections on the strategy and allocations policies and out of area placements:

- Throughout the HBC Strategy 2019-2023 there are direct references to people with MCN and priorities include clear aims to further meet the needs of this group of people.
- There is a very clear acknowledgement of the increasing scale of emergency and temporary accommodation and live debate about this by HBC; the content of the Strategy 2019-2023 in particular is very open about this and expresses a concern about the placement of MCN in to general needs accommodation and draws a link between homelessness, people with MCN and the placements into emergency accommodation which we feel is an important connection to be made at a strategic level, as many FLSE clients are placed into these accommodation spaces.
- The Strategy 2019-2023 implies that people with MCN are having to be placed into local unsupported temporary accommodation spaces as supported accommodation spaces are limited, rather than being placed out of area.
- The general housing allocations policy does not reference any instances where a household would be placed out of area/in a neighbouring borough/outside of Hastings.
- To complement the 'Hastings Borough Council Homemove Allocation Scheme 2018', we feel it would be helpful to have the allocations policy for temporary or interim accommodation available (we were not able to source this at the time of research). With the growth in emergency and temporary accommodation named in the strategy and increased use of TA in the local area, we feel this would be helpful and appropriate.
- We found no direct reference to the Supreme Court case of Nzolameso v Westminster in the Strategy or allocations policies and in light of the Strategy's commitments to address emergency and temporary accommodation, this may be useful to help provide further context for such priorities and demonstrate clearly the authority's recognition of the learnings that came from this case.
- Whilst the Strategy 2019-2023 has a number of references to multiple and complex needs the Allocation Policy does not. We feel there is already a clear reference in local policy to this group of people as set out in the strategy and this should be carried across and represented in the local allocations policies as a way to ensure the needs of this group can be recognised and met.

5. Conclusions

Having explored housing allocations policies for different areas nationally and locally, it is clear there are variations of practice at both levels. However, the experiences of people with lived experiences of homelessness (including clients) have shared with FLSE, indicate that out of area placements are made across all 3 areas locally and that such placements are often very challenging.

We have paid attention to the local homelessness strategies alongside allocations policies in this report because we see a link between unsupported temporary accommodation placements and perpetuating cycles of homelessness for people with MCN. FLSE has learnt that unsuccessful emergency/ interim/ temporary accommodation placements are extremely problematic. Allocations into temporary accommodation can address an immediate need to accommodate a person who is homeless but if not successful, can perpetuate recurring cycles of homelessness and further compound people's mistrust and lack of faith in support systems. Out of area placements remove people from networks of support that are likely to have taken a long time to establish for this particular group of people and despite their multiple needs, we notice that often they are not consistently placed in the highest priority need banding to receive in-area accommodation. Furthermore, if out of area placements breakdown individuals are then at risk of being perceived as making themselves 'intentionally homeless' by a local authority and therefore, the risks of compounding the cycles of homelessness increase.

Out of area placements are not widely discussed in the three local authority public strategies and policies. At the time of this research, B&H were the only local authority to have developed a dedicated 'Allocation of TA Policy and Procedure Document' and have this published on their website. This policy sets out who can expect to be placed into accommodation and to what degree this accommodation is within B&H: only those placed in priority band A can expect placement in area.

The EBC 'Factsheet: Applying for assistance with housing when you are homeless or threatened with homelessness' does not include procedures around temporary accommodation allocation placements but it does include messages suggesting out of area placements may be made.

The HBC Strategy 2019-2023 and allocations policy did not have direct references to out of area temporary accommodation placements and instead, have an emphasis on trying to place people with MCN in area and in expanding supported accommodation options in area.

All three local authorities openly shared in their strategies and general needs allocations policies, how they are grappling with a challenge in limited housing supply and all express concern about the growing number of placements into Temporary Accommodation in their Strategies. Hastings is the only local authority to set the reduction of emergency accommodation as one of its high level strategic priorities in its Strategy 2019-2023 and we felt it does well to acknowledge the connection between homelessness, successful accommodation placements and building trusting and supportive relationships with people with MCN.

The local context of Brighton & Hove, Eastbourne and Hastings is seeing a similar picture in:
- Rising number of homeless people,
- Increased competition in the private rented sector,
- Funding cuts,
- the Housing Act (1996) giving more responsibility to local authorities,
- Rising numbers of placements needed as part of the Everyone In directive in the context of limited housing supplies,
- Addressing move on from emergency Everyone In placements

This research highlighted that all 3 local homelessness strategies named and discussed to varying degrees the needs of people with multiple complex needs. However, this same group of people are not directly referenced in any local allocations policies; the language is not brought across to advise on how housing placements can be made for this group of people. We feel there is an opportunity to use such definitions across Strategies and Policies to ensure the needs of this distinct group are recognised and met at both strategic and operational levels.

The Nzolamezo v Westminster City Council case set a precedent for how local authorities should approach out of area placements and this case helped lend a national perspective to this research. During this research, we found only B&H local authority had named and commented on this case in their allocations policy. At the time of this research, we were unable to locate reference to this case in the other local areas' housing policies.

All local allocations policies include comments and discussion around the medical needs of people seeking housing support and we noted that medical needs impact on the priority bands a person will be placed in and subsequently impacts on the housing placements they will be offered. We feel there are opportunities to expand on these definitions across all three local areas' policies to include the medical needs of people with MCN – for example, the inclusion of substance misuse services as a medical facility and/or part of medical treatment.

When reflecting on the local approaches to temporary accommodation placements with the FLSE project group, the group wanted greater clarity on the procedures for this in Eastbourne and Hastings. The group had concerns that people with MCN were not clearly identified in the allocations policies across all three local areas and were concerned that if people were placed out of area that this could negatively impact on their original local connections. The group felt the recommendations set out by the NHAS were helpful and relevant to people with MCN and wanted local authority teams to ensure these guidelines were embedded into staff practices during housing needs assessments.

6. Recommendations

Following our research into the local area homelessness strategies and allocations policies and reflecting on the experiences of people with MCN, we feel there are opportunities for development to improve understanding of how temporary accommodation placements are made and also to strengthen procedures to enable people with MCN to be allocated in-area placements locally.

- For people with MCN not be placed out of area unless they have specifically requested it. If in exceptional circumstances, MCN clients are placed out of area, for them to always be prioritised for a placement back in their local area.
- During discussions in 2021 our team stressed that if out of area placements have to be made, the importance of the local authority placing a person out of area maintaining regular contact with the local authority they have placed into.
- For EBC and HBC to include their temporary accommodation allocation policy and procedure on their website alongside their general needs allocations policies.
- In light of the large growth in recent temporary and emergency accommodation placements, for local authorities to revisit the case of Nzolamezo v Westminster City Council to ensure recommendations from the Supreme Court guide local practice.
- For local authorities to embed definitions of MCN into their allocations policies to ensure strategic goals for this group of people are clearly represented in operational guidance.
- For local authorities to review the definition of medical needs and ensure the distinct medical and health needs of people with MCN are represented and considered.
- Cross county discussion on the topic of out of area placements to agree useful ways of working. There are similar challenges named by each local area and we feel dialogue between local authorities and exploring the viability of joint working protocols may be useful steps forward to improve the out of area position.

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