

Consultation Response

Shelter's response to the ODPM consultation on Supporting Independence: a strategy for the Supporting People Programme

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Shelter

Shelter is a national campaigning charity that provides practical advice, support and innovative services to over 100,000 homeless or badly housed people every year. This work gives us direct experience of the various problems caused by the shortage of affordable housing across all tenures. Our services include:

- A national network of over 50 housing aid centres
- Shelter's free housing advice helpline which runs from 8am-midnight
- Shelter's website which provides housing advice online
- The Government-funded National Homelessness Advice Service, which provides specialist housing advice, training, consultancy, referral and information to other voluntary agencies, such as Citizens Advice Bureaux and members of Advice UK, which are approached by people seeking housing advice
- Five 'Homeless to Home' schemes around the country which supports families to settle into a new home and community after they have been homeless
- The Shelter Inclusion Project, which works with families, couples and single people who have had difficulty complying with their tenancy agreements because of alleged anti-social behaviour
- The Older Persons Tenancy Support Service offering specialist housing support to enable older householders remain as independent as possible and to manage the responsibilities of being a householder
- The Somerset Gateway Project, a unique model of assessment and referral to ensure equitable efficient and appropriate access to Supporting People funded housing support services or to other services more appropriate to need
- The Cumbria Offenders Project which provides specialist housing advice and tenancy support to people with an offending background, or those at risk of offending, and their families.

Summary

Shelter believes that the Supporting People programme has been successful in providing housing-related support to a diverse client group. In order to ensure that this success is built upon, Shelter supports:

- a national framework for the programme
- 3 year funding settlements
- ringfenced funding
- the creation of user-forums to ensure a service user voice in the commissioning and delivery of services

Introduction

Shelter welcomes this consultation on the future of the Supporting People programme. A broad discussion as to the way forward for housing-related support is needed, particularly at the current time. It is widely recognised that Supporting People stands at a crossroads. Decisions made now will be key in determining the effectiveness of housing-related support in the years to come.

Shelter is convinced of the value of such support and believes it plays an essential role in preventing homelessness, repeat homelessness and admission to care. It is therefore with grave concern that we note the cuts to the funding of the programme. Shelter has pioneered acclaimed floating support services to vulnerable groups such as the elderly and formerly homeless families, schemes that are funded through Supporting People and play a pivotal role in enabling such groups to remain in the community. Yet, the viability of these services is now threatened by the cuts to the Supporting People budgets. There is also pressure on providers of housing-related support to reduce their hourly rates. Shelter is not alone when it says that the funding it receives from the programme is spent on staffing the support services. There are no backroom excesses which can be cut in a drive to make services more efficient. Any cuts directly affect front-line provision. The cutting of Supporting People funds means cutting the services which prevent homelessness and admission to care.

We are also concerned that the Government's proposals will create damaging uncertainty and instability, undermining the ability to plan the development of services in a coherent and coordinated way. The Audit Commission's October 2005 inspection report on Supporting People services highlighted the number of providers pulling out due to the uncertain future of the programme and the absence of any long-term vision for housing-related support. The future does indeed look uncertain. This consultation paper, for example, introduces the idea of removing ringfenced funding and merging the Supporting People budget with other funding streams. Central Government seems keen to step away from directly overseeing the programme and instead wants local authorities to administer the programme on an area-by-area basis. Such changes would constitute a significant shift in the way services are delivered, and will make it more difficult for commissioners and providers to plan ahead for what services are needed and to ensure that services are as coordinated as possible.

Response to the consultation questions

We have structured our response under general headings corresponding to the themes raised in the consultation paper. In addition, we have submitted a separate response to the question of handyperson services raised in the grant conditions and directions for 2006/7.

Supporting People in its Strategic Context

National, local, individual

Shelter applauds the Government's commitment to fully involving local authorities and service users in the provision of housing-related support. In order for such support services to be most effective, local Supporting People strategies must be linked to other key local strategies and not be out on a limb, unrelated other local authority functions. However, we are concerned that the local and individual focus should not be at the expense of a national framework within which the programme functions. Other proposals in the consultation paper include the unringfencing of Supporting People funds and a reduced role for the Government in monitoring and overseeing the provision of housing-

related support. In this context, Shelter would urge caution against the idea that local and individual *per se* are necessarily best.

Shelter believes, as the Government does, that housing-related support should be a core local authority function. Local government has an important role in looking at the collective needs of an area and responding to them with aim of improving individual wellbeing. However, if local authorities administer the programme solely with reference to the very local need and without consideration of broader, national needs, then inequalities in the provision of housing-related support will abound. A national plan is essential in order to avoid a postcode lottery, and individual and local preferences need to be considered within a national framework with minimum standards.

User-focus

In order to create a user-focus, the Government proposes direct payments to individuals who thereby have maximum choice in purchasing services. Alongside this, it proposes to create detailed e-based information banks to provide the information necessary for an informed choice to be made. However, it is important to recognise that direct payments themselves do not provide more or better services from which to choose. If services are bought on an individual basis, it is likely that only popular services will be provided. Those services which are easy to provide cheaply or at a profit will be more available and specialist or niche services which may be more costly or complex to provide, will suffer. Ultimately, this limits rather extends user choice. Responsibility for decisions becomes privatised and broader accountability is lost.

Local authorities are in an ideal position to maintain a community-wide perspective on service provision and can support groups and individuals to obtain equitable access to Supporting People services. One of the major gains of the Supporting People programme has been the introduction of strategic planning into the provision of housing support. To focus on individual choice at the expense of local and national planning, risks undermining this strategic view.

An alternative way of ensuring a user-focus is to set up user forums, linking up commissioners, providers and users (see box for an example of this approach in one of Shelter's Homeless to Home projects). In Shelter's experience, commissioners meet with providers to discuss contracting and providers meet with users to deliver the service, however there is a gap in that commissioners and users are unlikely to meet. Under such an arrangement, commissioners are unlikely to have a thorough understanding of the views of the service user when purchasing a service. Building user consultation into the process would bring a service user voice to the strategic planning of services, influencing the overall provision in any given area.

User Forum in Shelter's Homeless to Home Scheme in Bristol

Our Homeless to Home scheme in Bristol provides Supporting People funded services to homeless families. Shelter has pioneered user consultation with the children of the families concerned. The forum, known as the Groovy Team, has been very successful in giving a voice to 8 -11 year olds within the Homeless to Home service. The children's experience and views have been used to assist teachers working with the children of homeless families. User forums can play an important role in linking service users, providers and commissioners.

Outcomes

The consultation paper explains there is likely to be a shift in emphasis in the Supporting People programme, away from planning and reviewing services and towards measuring outcomes. ODPM proposals concentrate on allowing local authorities to set outcomes locally. Shelter agrees with the Government's outcome rather output focus. There are two key areas we would like to comment on:

- National as well as local collection of outcomes information is required to understand the impact of Supporting People.
- Both quantitative and qualitative outcomes data are required to understand the real value of a service. This is especially important for services designed to support vulnerable people, as outcomes in this area are often hard or impossible to quantify in a meaningful way.

The Supporting People programme funds a diverse range of activities and different outcome measures will be needed for different services. However, it seems appropriate that in general, equivalent services should be subject to the same outcome measures, regardless of geographical area and that some outcome measure should be applied across nearly all Supporting People services. For example, Shelter runs 5 Homeless to Home projects in different parts of the country, providing floating support to formerly homeless families in transition to a stable home. If each local authority were to impose different outcome measures, it would not only be administratively burdensome but would also remove the possibility of genuine service comparisons. Differing results within a standard system could reveal strengths and weaknesses within individual services, or could be explained, for example, by differences within the client group. However if outcomes are measured variously then trends and location-specific anomalies are harder to identify. The measuring and collecting of information systematically will, in our opinion, result in a higher quality and more efficient collection of outcomes data.

Outcomes about the impact of the service on clients' lives should be collected as well as outcomes which assist in evaluating the wider impact of the service. For example, a primary aim of many projects will be tenancy sustainment. Figures around tenancy sustainment are useful, especially where this information is collected for the period before, during and after engagement with a service, but a fuller picture of the value of the project would be achieved if this information were presented with complementary data about client outcomes around independent living skills, health, and suitability of accommodation. Client outcomes sometimes need to be self-reported or practitioner-reported and are not always evident in pure numerical measures. BVPI indicators around the Satisfaction of Local Authority tenants demonstrate how self-reported outcomes can be used as quantitative performance measures (www.bvpi.gov.uk).

Shelter is committed to developing useful outcome measures relevant for our housing advice and support services. Current and recent research projects to understand and capture the outcomes of our work include:

- An independent study by the University of York to independently evaluate the Shelter Inclusion Project. This is a Supporting People funded scheme, which works with families, couples and single people who have had difficulty complying with their tenancy agreements because of alleged anti-social behaviour.
- Research into the outcomes of housing advice provided throughout Shelter's Housing Aid Centres.

- In Sheffield, we are working closely with the Supporting People team to develop outcomes for services in Yorkshire and Humberside region.

We would hope that the fruits of this joint working will inform the debate around national outcome measures.

Focusing and Integrating Support

Supporting People is a wide-ranging programme assisting a diverse range of clients. It can be helpful to cluster groups in order to consider their specific housing support needs. Shelter welcomes the model proposed by the Government as a tool to aid discussion and debate and is in agreement that, in practice, these groups overlap. The ODPM divides the user groups into three: people in receipt of care with support; people living independently but with support; and people experiencing or at risk of social exclusion.

Shelter has considerable expertise in working with the third, socially excluded group and the bulk of Shelter's Supporting People services are provided to this group. One of the questions raised by the Government concerns the need to ensure that local authorities provide services to groups which may be perceived as unpopular e.g. the homeless, those fleeing domestic violence, ex-offenders or drug users. This acknowledges the very real problem of gaps in service provision for such groups. The ODPM suggests paying Supporting People funds into the Local Area Agreement pot, thereby removing any ringfencing, and then allowing the local authority freedom to allocate funding without restriction. Given that there is already a reluctance on the part of some authorities to provide housing support services in general and services to the vulnerable user groups in particular, it is hard to envisage how this proposal could improve matters. Shelter anticipates that if Supporting People funding were to be paid into a Local Area Agreement pot, the temptation to use the money to fund statutory services would be overwhelming. In Sheffield, for example, the current Local Area Agreement budget is £2m, whilst the Supporting People budget is £28m. Were the streams to be merged, it seems unlikely that housing related support services would be funded to the same amount, despite a proven need for the services.

Shelter believes that the most effective way to ensure services are provided to the Supporting People client group is to introduce a statutory framework which sets down minimum standards. Attached to this, there would need to be targeted funding to enable local authorities to discharge their duties. Shelter believes this would provide a firm footing for the development of Supporting People services and would allow the growth of a healthy housing support sector providing relevant services.

Local connection

Further to the question of how to ensure local authorities provide essential services, the consultation paper asks how to avoid the implementation of local connection policies, which exclude vulnerable service users from much needed provision. This is of concern to Shelter as many who approach our housing aid centres have been refused services due to local connection being inappropriately applied.

The idea that services should only be available to those from a specific geographical area is a theme which has run through welfare provision for centuries. It was grappled with

most effectively in the debates which preceded the Housing (Homeless Persons) Act 1977. In a move to cut across the practice of referring homeless families from pillar to post, the homeless legislation placed a duty on local authorities to assess applicants fully and accommodate them temporarily whilst doing so. The local authority was to decide if a duty was owed before any local connection criteria could be applied. If the applicant was owed a duty, but found to have a local connection with a different area, then a referral could be made subject to specific conditions set out in law. Meanwhile the applicant continued to be accommodated. This clear statutory procedure has to this day been most effective in ensuring that inappropriate local connection criteria are not applied to statutorily homeless applicants at the point of accessing a service. In addition it provides a clear basis upon which to challenge any breach.

Until recently, the application of local connection criteria was confined to the statutory procedure above. Non-statutory homeless services, mainly those to single homeless people, have not subjected service users to a local connection test. However, more recently there has been a new development in that providers of emergency accommodation-based services have begun to apply local connection criteria to vulnerable groups at the point they attempt to access the service. Invariably this has been attributed to cuts in local Supporting People budgets which have made Administering Authorities reluctant to fund any service to a user from any other area. In the consultation paper the ODPM suggests sub-regional working between authorities as a way of avoiding services being restricted in this way. However, this does not address the problem of local connection criteria being applied to those who cannot demonstrate a connection with the sub-region. The ODPM has also promoted the use of a *reconnection* protocol, which provides travel warrants for the single homeless to return to other areas. Those wishing to enter Supporting People funded hostels, for example, are subjected to a local connection test at the point of access. Shelter is concerned that cuts in Supporting People budgets are creating an environment which prevents a wider preventative approach to homelessness from being taken.

It is major source of concern to Shelter that homeless and vulnerable people are being refused assistance on the basis they have no local connection. We oppose the idea of removing assistance, including support services, to such groups on local connection criteria. This practice reinforces Shelter's view that there is a need to plan nationally, with a national safety net, ensuring there are minimum standards wherever in the country housing related support is needed. Without a properly funded duty on local authorities, the temptation to remove housing support to groups which may be deemed unpopular will stand in the way of effective services which prevent homelessness, repeat homelessness and admission to more costly, higher level care.

Funding

Funding Settlements

On this point, the consultation acknowledges the call for three year funding settlements but these are not yet a reality. From Autumn 2006 local authorities will receive a two-year settlements only. One of the key features of the Supporting People programme is that providers have to bid for funding for their projects and then justify their service delivery every year. Funding thus far has only been allocated for a year at a time. The requirements are such that small providers in particular find themselves over burdened with paperwork and use disproportionate amounts of resources chasing funds. Rarely can

service providers afford to incur the high level of transaction costs implicit in such a system of bidding. Shelter is willing to invest time, effort, infrastructure and know-how in order to make Supporting People projects work effectively. Yet, the full value of this cannot be realised if short-term funding impedes innovation in service provision. Shelter believes that funding needs to be secured for three years, in order that services can be planned most effectively. If the Government implements the idea of individual budgets, providers will find it even more difficult to plan reliably, as the demand for their services will be much harder to predict. Those offering niche or specialist services will be worst hit.

The consultation refers to the fact that local authorities most committed to the provision of Supporting People services will use other pots of funding to invest in housing-related support, beyond the Supporting People grant. In this way, the consultation paper suggests, services under threat of closure due to cuts in Supporting People funding, can remain open and available. Shelter is concerned at the prospect of services closing as a result of cuts, and is sceptical that local authorities will be able to make available alternative sources of funding, given the financial constraints that currently exist in local government. Shelter believes if the Supporting People budget is subject to further cuts and in addition, the money is unringfenced, it is less, rather than more, likely that local authorities will provide services to those in need of housing-related support.

As a provider of services to those experiencing or at risk of social exclusion, Shelter has significant reservations about the payment of Supporting People grants into the Local Area Agreement pot. As noted above, Shelter believes that unringfencing the grant in any form would lead to the money being used to achieve other Local Area Agreement objectives, in particular in health and social care areas, at the expense of housing-related support. Instead of introducing unringfenced funding, the government should send out a clear message that the provision of Supporting People services is not negotiable and should place a duty on local authorities to provide housing-related support and by funding councils specifically to carry out this function.

Administering the Programme

At present the ODPM ensures a national system for monitoring the Supporting People funds through a series of mandatory grant conditions. The consultation paper explains that in future, the ODPM may cease to impose national criteria to which Administering Authorities and Supporting People teams and providers have to adhere. Instead local authorities may be given the freedom to design their own arrangements for contract review and performance. The Government suggests that this would scale back administration and release funds for direct service delivery.

However it is not clear how the ODPM reach this conclusion. The removal of a national system and its replacement with myriad local systems is not necessarily either more efficient or less bureaucratic. Shelter believes that a mandatory framework both necessary and useful. It can be key in establishing minimum standards across the country and thereby reduce the inequalities in service provision. Last year's Audit Commission report found the delivery of Supporting People services to be variable and inconsistent. Without such a national minimum standard, the quality of local authority responses to Supporting People is likely to worsen. In addition, standard contracting processing and procedures avoid unnecessary duplication. Many providers function across local and regional boundaries and differing procedures for each local authority increases the administrative

burden associated with the programme. It makes sense for there to be a nationally negotiated form of contract and costs template. Shelter believes that the Association of Chief Executives of Voluntary Organisations (ACEVO) full cost recovery principle should be incorporated within this.

eSupporting People

The consultation paper sets out the future of eSupporting People services and in particular examines the need for a single national database of service options. If service users are to be given direct payments, then such a move necessitates the creation of a guide to the services in existence. The consultation also raises the possibility of establishing a system to track those who return to support services in different areas, in particular seeking to monitor those who move between service areas.

Shelter's expertise in working with vulnerable and socially excluded groups has already resulted in the development of a monitoring system known as multi-agency monitoring, or MAM. This tracks homeless households through their contacts with services and agencies, enabling a comprehensive picture of the nature and factors underlying homelessness to be built up, and highlights where interventions succeed or fail. It also monitors any gaps in provision, enabling service improvements. In addition, a tracking system has already been set up in Cardiff for hostel users. In Sheffield, a new system is being developed and Shelter is evaluating it. We are happy to share our experience in this field to take this discussion forward.

Conclusion

We firmly believe that good quality housing-related support can and does enable people to remain independently in their homes rather than having to enter a more costly form of care. It also prevents homelessness and repeat homeless and combats social exclusion. We believe that the Supporting People programme should function within a statutory framework with a ringfenced funding stream attached. This would ensure the funding is spent on the housing-related support for which it is intended and not siphoned off to fund other services. Shelter opposes the cuts in funding to housing-related support services and is concerned that essential support services are being withdrawn as a result.

Shelter believes that local authorities should have a clear role in planning for collective needs within a national structure. Service user involvement can and should play an important role in determining the services commissioned. However, Shelter believes that individual service user choice alone, outside of any clear mandatory framework, militates against the collective planning of services. Instead Shelter proposes building in full user consultation forums into the commissioning and delivery of services. Such moves would provide the firm footing which the Supporting People programme has been struggling to find.

**Shelter Policy Unit
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