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Response to Westminster's draft Homelessness Strategy 2019-2024

Citizens Advice Westminster

Citizens Advice Westminster helps people resolve their legal, money and other problems. We do this by providing advice and information on their rights and responsibilities, as well as influencing local government and other decision-makers to improve their policies and practices which affect local communities. In the last quarter alone, Citizens Advice Westminster dealt with 49 cases involving actual or threatened homelessness which gives us an insight into the important social issue of homelessness.

The context

We welcome Westminster City Council's new Homelessness Strategy which brings added focus to addressing: the causes of homelessness, the prevention of homelessness and the treating of residents at risk of homelessness holistically. The City Council is amongst the wealthiest in the country and should be able to deploy more resources to alleviate homelessness.

It is clear, the state of the housing market in Westminster makes dealing with homelessness especially challenging. As the City Council's Review of Homelessness 2019 states, property prices and private rents are amongst the highest in London, with limited land available for development. Table 1 of this review states that 40% of the housing stock is privately rented, 26% is social rented, and 31% is owned. Westminster also has large numbers (currently believed to be over 8,000) of active short lets and roughly 0.5% of the housing stock is empty, much of it for periods longer than 2 years; both of which can reduce the housing supply for permanent residents.

The review (para 4.5 and Table 4) also states that 40% of all Westminster homes are one-bedroomed, and that there is a significant shortage of family homes. This means that waiting times for 1-bed social housing is only 1 year, whilst waiting times for 2-, 3- and 4-bed properties are 10, 16 and 34 years respectively. This shows a clear discrepancy between the needs of Westminster residents and the properties available to rent.

Whilst we welcome this strategy, however we feel that it could go further.

Of the ten points listed, nine relate to improving outreach and communications, setting client expectations, and performing further research into homelessness and lobbying.

These are all important points and necessary actions, but they do nothing to increase the housing supply. The one point that is about increasing the housing supply is lacking in detail on how this will be achieved and uses phrases such as “setting a new challenging target” and “continuing to look for innovative ways to increase supply” without giving concrete proposals.

Preventing people from becoming homeless in the first place

1. Reach more people at risk of homelessness at an earlier stage, by building a network of prevention and support, working with partners and communities

In developing a ‘Homelessness Prevention Charter’ we hope that Westminster City Council will take responses like ours, on behalf of the from the community, into consideration especially when we draw attention to areas where the Homelessness Strategy falls short, or could be amended. The proposed charter needs to be a genuinely collaborative effort to involve the community and those community organisations that support them.

Building referral routes to your services would certainly be beneficial as we have encountered issues when accessing the current Housing Solutions Service. Advice agencies across Westminster need a more direct line of contact to housing officers/managers to enquire about homelessness and housing applications. Most of our communications regarding housing are with individual housing officers that have been allocated to residents, but response rates need improving and we want to see each enquiry being answered in a timely manner. Other housing enquiries are done via the contact form on the website which does not allow documents to be sent, nor does it offer a rapid response.

2. Make services more visible by targeted information campaigns

It is important to manage the expectations of residents so they are aware of the limits of what they can expect from the council.

More information should be provided on the less well-known factors that could prevent homelessness, such as:

- Early Intervention Trailblazer Program – this is good service that needs to be promoted as it helps with earlier prevention.
- Ways to get financial help e.g. Discretionary Housing Payments (DHP) for shortfalls in benefits, help with raising a deposit for private tenancies. These need to be explained to those at risk at an earlier stage, so that applications can be processed, and evictions avoided.
- Information about the Local Housing Allowances (LHA) and Benefits Cap. It’s important that people are clear about the limits on financial support through benefits so they can aim for appropriate accommodation.
- Where to look for alternative accommodation – rather than looking broadly at the likes of Zoopla and Rightmove whose listed landlords have properties that are usually out of the price range for low-income families, it may be better to direct residents to specific landlords, agencies or sites which are known to offer lower priced options

3. Proactively offer personalised support to those at risk of homelessness, where possible, from helping them negotiate with their landlord to offering employment and skills training, so they can increase their income.

We welcome this proactive approach and the expansion of the Early Intervention Trailblazer Service. We also welcome Westminster's cross-organisational approach with people at risk being given advice on employment, debt and education, and the fact that the private sector is also part of the solution. However, the strategy also needs to address residents' valid concerns about higher rents and less security that exist within the private sector. In particular, the worry that they would lose their place in the housing queue and if they were subsequently to be evicted by their private sector landlord, they would re-join the housing queue at the back.

We welcome the use of data from other organisations such as the Department of Work and Pensions, the council's Housing Department, the Revenue and Benefits service and Adult Social Services etc., and the use of 'flags' to identify people at risk of homelessness. This cross departmental working would be of great benefit. However, this sharing of information would need to be reconciled with the General Data Protection Regulations (GDPR) that restricts what data can be collected about an individual and how that data can be used and shared.

Housing Plans need to be a 'living' document, constantly changing and revised according to the household's situation. Currently, residents are given a housing plan at the time they make an application, but too often they are then left adrift and given no further support from the housing officer assigned to their case. Given that housing cases take years to develop, there should be regular contact with each applicant, at least every 6 months, to review that their housing needs are continuing to be met in temporary accommodation, and to see if there are any developments that would require a revision to the housing plan.

Services offering employment and skills training to increase income will offer more long-term solutions and need to be properly resourced.

4. Do more to identify and address the main causes of homelessness in Westminster and also the wider causes, through research and outreach.

We welcome the strategy's focus on those aged 18-25 and the proposal to run awareness sessions in schools and youth centres about the factors that can lead to homelessness. This is especially important considering that one of the main causes of homelessness is family no longer being able to accommodate adult children. Access to mediation services is key to help with family conflicts.

Continuing to take action to prevent unlawful or retaliatory evictions is welcome. However, with both social and private landlords, even when tenants report poor conditions, there is a lack of enforcement action. Furthermore, many tenants do not know their rights or how to enforce them and the council should make this information widely available.

The strategy needs to be mindful of the fact that there are proposed legislative changes to abolish so-called 'no fault' Section 21 evictions, adding new grounds for giving Section 8

evictions and increasing the minimum length of tenancy agreements. These legislative changes, if enacted, may have unexpected consequences in the supply of private rented accommodation. Westminster City Council needs a strategy to cope with this, should it arise.

5. Make our housing services more transparent, accountable and accessible.

We note that the strategy includes improving digital access to the Housing Solutions Service, but that this should not be at the expense of the digitally excluded, who, for whatever reason, are unable to use the internet.

In order to *improve your services and response when people become homeless* this strategy would benefit from taking a more holistic approach to someone's reasons for being homeless or having housing difficulties, instead of just focusing on the moment at which they present themselves as homeless or report a housing issue. After first contacting the housing service, residents can be placed in temporary accommodation for many years, so the initial contact should be viewed as the beginning of the service, with the end being the placement of the resident in long term accommodation (be it social or private housing).

6. Better communicate what we can and can't offer.

We accept that it is vital to manage residents' expectations in light of the chronic and challenging housing situation in Westminster. This needs to be done not just with people who access the Housing Solutions Service, but also through outreach activities planned in point 4 of this strategy.

In particular, the housing service needs to explain to applicants that they should not expect social housing from a homelessness application and that there is a high chance they could be discharged to the private sector.

7. Ensure a range of accommodation is available for the homeless households that we have a housing duty towards, when homelessness cannot be prevented.

This is the only part of the ten-point plan that attempts to address the inadequate housing supply. It lacks concrete details and does not deal with some of the causes that limits housing supply. We do, however, welcome the fact that Westminster is leveraging the private sector to deal with homeless households.

- a) Westminster has an "ambitious target" to deliver 1,850 affordable homes by 2023, but no details on how this will be met are provided. Realistic and achievable plans must be in place to outline how this will be achieved over the next 3 years.
- b) 'Affordable' housing is a description frequently used, but it is defined as being no more than 80% of local market rates. The income-levels of those who approach homelessness services in Westminster are significantly lower than what is required to afford this so-called 'affordable' housing.
- c) No detail is given on the mix of these 1,850 affordable homes. Detail must be provided on the split between studio, 1-, 2-, 3- and 4-bed homes. There should also be information on the process for deciding the level of split, and whether it meets the needs of Westminster

residents with children, who face overcrowding and desperately need 2-, 3- and 4- bed accommodation.

- d) More detail is needed on what proportion of these 'affordable homes' will be social housing.
- e) Though there is a target to deliver 1,850 affordable homes, there should also be targets to reduce average waiting times for social housing. It is simply unacceptable that residents in overcrowded accommodation with children of mixed genders, possibly also caring for aged parents, should have to wait an average of 16 years to move to a 3-bed property, or 34 years to move into a 4-bed one. More detail is needed on how much these 1,850 affordable homes will reduce average waiting times by.
- f) There are currently 4,000 households with priority for social housing, yet the housing target is only 1,850 new homes by 2023. More details are needed on the strategy for dealing with the shortfall.
- g) The strategy does not include any measures to deal with the estimated 8,000 active short lets (e.g. Airbnb ones) which reduces the housing supply for Westminster residents.
- h) The strategy does not include any measures to reduce the number of empty properties in Westminster in order to increase the housing supply.
- i) The strategy must address whether the council will continue to move families out of London to find them housing. The strategy should also include giving more support to homeless residents who actively wish to relocate out of London in addition to the mutual exchange of properties between social tenants.

8. Review how people access supported housing and ensure it meets needs, now, and in the future.

It is clear from the City Council's Housing Application Form (March 2017) that due to the very short supply of council and housing association homes, new applicants are likely to be added to the housing register only if they are in a priority group (e.g. living in hazardous conditions or in a place unfit for human habitation, have a serious medical condition made worse by the current home, or there is a very high welfare need).

Newly commissioned homes should, therefore, predominantly be supported housing, i.e. accommodation which includes some home care and support, for those with serious medical conditions or very high welfare needs. The strategy needs to explicitly state how many of the 1,850 affordable homes in the 2023 target will be supported accommodation.

9. Become a leader in the field of homelessness prevention, proposing solutions and bringing key decision makers together to share information and ideas.

This is a worthwhile ambition requiring a great deal of focused, determined, imaginative and well-resourced work in order to be able to *meet the challenges ahead and have a homelessness system fit for the future.*

10. Make the case for homelessness services and prevention work to be fully funded, and lead the discussion with Government and others on how the welfare system can work

better for low income residents in central London, where the cost of living continues to increase beyond many people's means.

We welcome the fact that this Strategy acknowledges that LHA levels and DHPs should better reflect the needs of Westminster residents, considering the high levels of rent here.

It should also be noted that difficulties with claiming Universal Credit (UC) increase the risk of homelessness, especially since there is a lack of integration of local services, or local knowledge within Job Centre staff who deal with UC, and the process is disjointed. This is best demonstrated by the following Citizens Advice Westminster case study:

Case Study

**Rosalie is single, of working age and currently homeless. She has previously worked in administration and had changed jobs to join a start-up that had to make her redundant after just a few months. As a result, she signed on for UC to help her with her living and rent costs.*

Rosalie was affected by the benefit cap while receiving UC, so she struggled to afford the shortfall between her rent and UC housing element payments. She fell into arrears due to this and then a missed UC payment – due to an administration error – caused her private landlord to seek possession of the property, making her homeless in March 2019. Rosalie continues to be homeless since she does not fall into any priority group which would make her eligible for homelessness assistance.

Rosalie's situation could have been avoided if she had been directed to apply for a DHP to help her with the benefit cap and rent arrears, but there was no advice given to challenge the Universal Credit payment, no direction to an advice agency to help her with this, and no help given for negotiating with her landlord when it came to possession proceedings. This sort of information was something Westminster Revenue and Benefits Service had been very good at doing in the past, but it has now been lost with the centralisation of UC. Rosalie is extremely capable of making her own applications if only she had been made aware of the local assistance available.

**NB. Client's name has been changed for data protection purposes.*

**Policy and Campaigns Team (Housing)
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28th August 2019