

**Proposed Changes to Kent's Supported Accommodation and
Floating Support Services
Consultation Questionnaire**

We are committed to keeping you involved and are keen to listen to your views.

Please let us know what you think by visiting www.kent.gov.uk/supportedaccommodation and completing the online consultation questionnaire.

Alternatively, complete the consultation questionnaire below and send it back to us using the address below:

- Email – 16-25accommodation@kent.gov.uk
- Post – Kent County Council, Commissioning Unit, Room 2.11, Sessions House, County Hall, Maidstone, Kent, ME14 1XQ (or phone us for a freepost envelope on 03000 414181)

Please submit your questionnaire by 8th February 2016.

Question 1.

Are you completing this questionnaire on behalf of:

*Please select **one** option.*

- a.
- b. **An organisation** → Please go to question 1b

Please tell us the name of your organisation:

Tonbridge & Malling Borough Council

Question 1a.

Which of the following best describes you? (Please tick all that apply)

- I am a young person who currently uses these services
- I am a young person who may use these services in the future
- I am a Family member, neighbour or friend of a young person who uses these services
- I am Foster Carer
- I am a Professional e.g. Advocate, Social Worker, Support Worker
- I am a Supported Lodgings Host
- I am a Landlord
- I am a Private Housing Landlord.
- I run a Bed and Breakfast
- I run a Training Flat
- I provide support services to people in their home e.g. Floating Support
- Other please specify

Question 1b.

Which of the following best describes your organisation? (Please tick all that apply)

- Independent Fostering Agency
- Supported Lodgings Co-ordinator/ Provider
- Housing Related Support Accommodation Provider e.g. Young People at Risk Service
- Teenage Parent Service Provider
- Independent Accommodation Provider
- Children's Residential Home
- Local Authority/ Housing Authority
- Housing Association
- A Hostel
- A Foyer
- Secure Accommodation Provider
- A Refuge
- Training Flat Provider
- Support services in someone's home e.g. Floating Support
- Other please specify

Question 2:

We are considering prioritising young people who are entitled to a statutory duty or who may need some support to prevent them coming into Care (Option 2)

This would mean that more young people who are entitled to a statutory duty (Children in Care including Unaccompanied Asylum Seeking Children, Care Leavers and 16 and 17 year olds at risk of homelessness) will be supported and fewer young people over 18, who are not entitled to a statutory duty will be supported.

To what extent do you agree or disagree with this prioritisation?

(Please tick one option)

- | | |
|---|----------------------------|
| <input type="checkbox"/> Strongly agree | → Please go to question 3 |
| <input type="checkbox"/> Agree | → Please go to question 3 |
| <input type="checkbox"/> Neither agree nor disagree | → Please go to question 2a |
| <input type="checkbox"/> Disagree | → Please go to question 2a |
| <input checked="" type="checkbox"/> Strongly disagree | → Please go to question 2a |
| <input type="checkbox"/> Don't know | → Please go to question 2a |
| <input type="checkbox"/> I do not wish to comment on this | → Please go to question 3 |

Question 2a:

Could you tell us why you say that?

Strategic Housing Authorities have statutory duties to those beyond those covered by the remit of this consultation process. Young people who the local authority (but not the county) might have a duty to would not be able to access appropriate accommodation as before, e.g. teenage parents, without a substitute system or safety net being in place. **This approach would also be at odds with the agreed Kent Young Homeless Persons Protocol, where the needs of the young person are the focus of the process.**

This proposal would mean there would may not be any appropriate accommodation available for those young people that neither KCC or the LA have a statutory duty to but who are still vulnerable due to homelessness.

The proposal could lead to an over concentration of specific client groups in one place, in particular the larger current KCC/SP funded accommodation. This may lead to schemes becoming very hard to manage, or challenging in terms of their impact on their existing environments. For example, if young person's schemes have much higher concentrations of 16 & 17 year olds, as opposed to the wider age spread across a more diverse need spectrum that have traditionally been preferred by referral panels in terms of creating manageable environments.

The proposed welfare reform changes restricting housing benefit for those under 25 would restrict young people accessing affordable accommodation in the private rented sector and therefore this proposal would mean that young people would not be able to source accommodation of any kind. Potentially this may lead to a rise in homelessness and rough sleeping for this vulnerable group, with the associated danger of sexual or financial exploitation leading to safeguarding issues.

Question 3:

We are also considering limiting services to those who are entitled to a statutory duty only (Option 3).

This would mean that young people over 18, who the council does not have a statutory duty to support, will NOT be supported.

To what extent do you agree or disagree with only delivering support to Children in Care including *Unaccompanied Asylum Seeking Children*, Care Leavers and 16-17 year olds at risk of homelessness? (Please tick one option)

- | | |
|---|----------------------------|
| <input type="checkbox"/> Strongly agree | → Please go to question 4 |
| <input type="checkbox"/> Agree | → Please go to question 4 |
| <input type="checkbox"/> Neither agree nor disagree | → Please go to question 3a |
| <input type="checkbox"/> Disagree | → Please go to question 3a |
| <input checked="" type="checkbox"/> Strongly disagree | → Please go to question 3a |
| <input type="checkbox"/> Don't know | → Please go to question 3a |
| <input type="checkbox"/> I do not wish to comment on this | → Please go to question 4 |

Question 3a:

Could you tell us why you say that?

Our response to question 2a also applies here, with an increased likelihood of the pitfalls, **including operating against the agreed Kent Young Homeless Persons Protocol**, along with the following points.

This could lead to young people making the conscious decision to enter the care system purely to give themselves housing options.

It is likely there would be a significant impact on local authority housing options teams due to the increase in footfall from young people having limited, if any, housing options and seeking advice, not all of which can be dealt with through mediation.

Further to this young people rough sleeping or sofa surfing may be in danger of sexual or financial exploitation leading to safeguarding issues.

The proposal would create added competition for private rented accommodation between the local authority and the county, and this would lead to fewer properties being available for households accepted as homeless by local authorities. This could potentially drive up rents, which would not be cost effective situation for the county or the local authority.

Such a change also brings with it the potential to halt the delivery of new bespoke supported schemes as Local Authorities struggle to comprehend the degree to which such a new resource would address truly local needs.

Question 4:

We are considering a standard service offer.

This would mean that young people will be able to access the same services. Services would cater for the needs for all young people and there would be no separate targeted services.

To what extent do you agree or disagree with the creation of a standard accommodation and support offer for all young people who will use these services? (Please tick one option)

- | | |
|---|----------------------------|
| <input type="checkbox"/> Strongly agree | → Please go to question 5 |
| <input type="checkbox"/> Agree | → Please go to question 5 |
| <input type="checkbox"/> Neither agree nor disagree | → Please go to question 4a |
| <input type="checkbox"/> Disagree | → Please go to question 4a |
| <input checked="" type="checkbox"/> Strongly disagree | → Please go to question 4a |
| <input type="checkbox"/> Don't know | → Please go to question 4a |
| <input type="checkbox"/> I do not wish to comment on this | → Please go to question 5 |

Question 4a:

Could you tell us why you say that?

In relation to young people, there is not a 'one size fits all' solution

Many young people will have issues that will require specialist support.

This proposal could lead to support needs for individual clients being missed.

Further to this young people with identified or unidentified support needs could be placed into unsuitable environments, e.g. clash of cultures.

There is potential for boroughs with resources and schemes that are not held in other locations to lose the present benefits this brings.

The strategic pressures across Kent are also not experienced equally across the 13 local authorities, and a Standard Service Offer may not reflect this diversity. This may apply to new and growing pressures in particular, such as unaccompanied asylum seekers (children) that require access to appropriate services, potentially a lesser issue in the west of the county.

This could lead to a reduction in providers who may not consider building new schemes, or existing providers changing current provision in response to the changes.

Question 5:

We are considering joining up services.

This would mean creating a service that is able to deliver a full range of stable, safe and well maintained accommodation (including smaller and larger properties) and appropriate personalised support packages (including targeted support as required) to meet the needs of all young people throughout their journey to independence.

To what extent do you agree or disagree with the joining up of accommodation based and floating support services? (Please tick one option)

- | | |
|---|----------------------------|
| <input checked="" type="checkbox"/> Strongly agree | → Please go to question 6 |
| <input type="checkbox"/> Agree | → Please go to question 6 |
| <input type="checkbox"/> Neither agree nor disagree | → Please go to question 5a |
| <input type="checkbox"/> Disagree | → Please go to question 5a |
| <input type="checkbox"/> Strongly disagree | → Please go to question 5a |
| <input type="checkbox"/> Don't know | → Please go to question 5a |
| <input type="checkbox"/> I do not wish to comment on this | → Please go to question 6 |

Question 5a:

Could you tell us why you say that?

Whilst this sounds ideal, we would need further detail on this proposal to be able to offer an informed response. For example, the way such an approach or model tackles known and understood problems with sourcing appropriate levels of move-on accommodation?

Question 6:

Kent County Council is considering either a countywide service or 4 area based services.

This would mean there were lower overhead and management costs and services would be delivered in a consistent way across the County.

To what extent do you agree or disagree with reducing the number of organisations delivering services? (Please tick one option)

- | | |
|---|----------------------------|
| <input type="checkbox"/> Strongly agree | → Please go to question 7 |
| <input checked="" type="checkbox"/> Agree | → Please go to question 7 |
| <input type="checkbox"/> Neither agree nor disagree | → Please go to question 6a |
| <input type="checkbox"/> Disagree | → Please go to question 6a |
| <input type="checkbox"/> Strongly disagree | → Please go to question 6a |
| <input type="checkbox"/> Don't know | → Please go to question 6a |
| <input type="checkbox"/> I do not wish to comment on this | → Please go to question 7 |

Question 6a:

Could you tell us why you say that?

The Council recognise that there is an urgent need to find efficiency savings and streamline the operation of existing services. Subject to the detail a “four area service” that also ensures a level of consistency seems a wise approach. However, it is important to stress that “quality” must remain as a foundation of the decision making that lays ahead.

Question 7:

Which of the following do you think would deliver the best outcomes for the young people who use our services? (Please tick one option)

- Option 1 Current – Services are delivered in various locations across Kent. Some areas have lots of services while other areas do not have any.
- Option 2 – Countywide service(s) (Kent)
- Option 3 – Area based services (North, South, East or West Kent)
- Don't Know/ Not Sure

Question 7a:

Could you tell us why you say that?

Our response is subject to understanding the detail. Potentially we understand that those areas that currently lack of services will benefit with this option, but we would also reiterate our response to the relevant aspect of question 4a.

This option is preferable to Option 2 which could ultimately result in the dilution of services.

It would seem sensible to align with the existing KCC staffing resources for the Social Care & Early Help Teams.

This option would make the best use of local expertise, which is to be embraced.

This option would also enable young people to remain within their existing support networks.

It is important to understand that “local connection criteria” varies between local authorities, as does the operation of their individual Housing Allocation Schemes. This could create unintended barriers in providing assistance, how will this work? This is a key issue to be understood moving forward.

Question 8:

If you think there is something we haven't asked you, or you would like to make any other comments on our options and proposals for this service, please use the space below to tell us:

Whilst we fully acknowledge the need to save money and streamline services we would urge you to consider the effects some of the proposals would have on vulnerable young people currently accessing services from other providers in Kent, such as those through direct access.

Most local authority's currently assist young people who are ready to leave supported accommodation by giving priority within their allocation policies as their role as the Strategic Housing Authority. This is to ensure that young people do not remain in supported accommodation when they no longer need the support so that spaces will become available in a timely manner for those who do need the support. This provision is likely to be removed or made redundant as LA's are unable to access the supported accommodation places and to source more accommodation for YP's not owed a statutory duty by KCC. **Some of the Options proposed also are at odds with the agreed Kent Young Homeless Persons Protocol, where the needs of the young person are the focus of the process, not the level of resource. Our concern is that some of the future directions would seriously undermine the principles of the joint protocol arrangements to the detriment of homeless young people.**

Further to this LA's will not be able to assist the young person when they have to leave that accommodation until the legal process has been followed. This could lead to high eviction costs to the provider, for example those who have not been given a priority.

We must reinforce our view that there could be significant increase in rough sleeping for this age group, which is a huge concern locally as well as for Central Government, especially in terms of potential sexual and financial exploitation.

We have not been offered any statistical data to support that Option 1 (to not make changes and keep models as they are) will not work. For example, how many care leavers currently occupy supported accommodation? How many referrals are being made by KCC into this type of accommodation which are not successful because places are being taken by young people owed a statutory duty by KCC?

We also have concerns about how the decisions may be phased in? For example if option 3 is chosen to only assist those owed a statutory duty, will all existing tenants be served with a notice or will it be when a void comes up?

Unfortunately there does exist already a negative perception about immigration in terms of using locally provided and funded resources. We would be concerned about large numbers of UASC children being prioritised as this could be considered discrimination against other priority groups who are just as much in need.

The lack of appropriate supported accommodation for young people could lead to an increase in young people seeking to fit into priority need/statutory categories in order to obtain housing as their options are decreased, and wider costs increasing.

The comments that have been made are based on the limited information given in this consultation. There is nothing to demonstrate how robust these services will be. We need more detail in order to make an informed opinion.

If limiting the number of providers through the tendering process, some existing providers may choose not to move forward and change the use of the accommodation, e.g. to general needs, thus reducing the accommodation available for young people.

We are concerned that these proposals could have detrimental effect on the relationship between LA's and KCC.

It has not been made clear about whether there will be an outreach service (currently floating support). If there is a floating support service, will this only be available to the young people that KCC have a duty to?

These changes are also adding instability to the process of providing new schemes and services, which are already under pressure due to changes in capital funding, the Housing & Planning Bill and Welfare Reform changes. This is despite the recent delay in the 1% rent reduction for such accommodation.

We would conclude our observations by making the following key point. We understand that there is to be a further review planned of homeless services that were previously funded by the Supporting People programme in Kent. This review significantly overlaps with arrangements for supported housing for young people, as any young people excluded from specialist projects by new eligibility criteria are likely to end up in services designed for adults that are not suited to their needs, or spend periods of time rough sleeping. We therefore consider that it is essential that these reviews are considered together, so that the broader implications for homelessness services can be considered before any potential new restrictive eligibility criteria are introduced.

Tonbridge & Malling would urge you not to introduce new eligibility criteria for supported housing projects for young people until this wider review has been completed. I would also ask you to fully involve the counties homelessness services in designing any new criteria, so that we can collectively understand and mitigate the impacts of these changes.