

Tonbridge & Malling Borough Council's response to the Funding for Supported Housing Consultation

Q1	<p>The local top-up will be devolved to local authorities. Who should hold the funding; and, in two tier areas, should the upper tier authority hold the funding?</p>
	<p>As the Local Housing Authority District and Boroughs are well placed to use their local knowledge to ensure local needs and priorities are identified and met by the funding , enabling them to fully inform how services are commissioned. Another aspect to consider is that not all supported housing is provided by LAs and many schemes are delivered by charities or the voluntary sector and Housing Providers. As the responsible authority for Housing and Benefits, District & Boroughs already have existing relationships across a range of supported housing providers. Consequently, by placing the funding with lower tier authorities that have a duty to meet the housing needs in their area will provide a more focussed approach to the appropriate and necessary allocation of housing funding which would not be so readily achieved by the upper tier authority. This would also reduce the risk of this specific funding being drawn in to other areas where upper tier authorities have responsibility, for example, in social care, which would dilute the intended purpose of the local top up funding..</p> <p>Our experience of the Supporting People (SP) regime suggests that it is less appropriate for Upper tier authorities to hold these funds.. This funding for Housing Related support for persons and households who are predominantly the responsibility of local housing authorities (LHA) was originally ring fenced and paid to upper tier authorities. The ring fence barely lasted 6 years and what LHAs are now faced with is upper tier authorities significantly reducing the former SP programme and subsuming this funding into the general pot to help meet the savings targets due to the increasing pressures on council budgets.</p> <p>If the funding is to be held by upper tier authorities' County Council's could devolve down responsibility for funding some schemes so that decisions are made at a District level in two tier areas (e.g. hostels). Should the upper tier authority take responsibility for the new funding model we would suggest that counties devolve responsibility for funding some schemes to district and boroughs or alternatively a 'duty to cooperate' and passporting the funding (as in the Better Care Fund) to lower tier authorities could be imposed. This would provide a mechanism for engagement and consultation across all local areas and services. Government also need to be clear about the objectives of the funding, what is included and what is not; this will provide the housing sector with confidence about the potential for what the funding can deliver.</p> <p>Irrespective of where the funding is administered the model needs to be clear, transparent with consideration of all associated costs. There needs to be assurances that this funding will be ring fenced and maintained beyond 2019/20. Without these assurances any local authority would be left facing increased costs should the funding become un-ring fenced, reduced or cease. There also needs to be a mechanism to increase the funding allowance as demand increases</p> <p>Local Housing Allowance cap is very place-dependent, even though the costs of developing and running a scheme are similar irrespective of geography. Higher</p>

	<p>caps would be a better basis for the new model and would reduce the number of individuals that would be impacted.</p> <p>It is also important that it is widely understood how supported housing can benefit a multitude of preventative agendas, for example Health and reducing admissions to hospital. Taking consideration of local and county wide priorities is also critical, district authorities are well placed to engage with and foster enhanced collaborative working arrangements between all stakeholders who will benefit from continued provision of supported housing.</p>
Q2	<p>How should the funding model be designed to maximise the opportunities for local agencies to collaborate, encourage planning and commissioning across service boundaries, and ensure that different local commissioning bodies can have fair access to funding?</p>
	<p>The funding model should take a holistic view, based on an analysis of current and future needs, including the wider benefits supported accommodation brings to other agendas such as health, education and training and employment. The model should be designed to be as flexible as possible to allow the top up to be applied in as wide a range of situations as possible together with a framework that allows co-commissioning across partners to get, the best possible fit of services to meet local need through bespoke provision models where appropriate.</p> <p>Co-commissioning is key as district councils should be equal partners in such an arrangement in view of their position and strong relationships with local communities. Within sub-regions lower tier authorities already have experience of commissioning services jointly in cluster groups, developing provision collectively. This funding would allow more of this work to take place and fit neatly into the West Kent devolution agenda which is now gathering pace.</p> <p>Low level support is a means by which people can maintain their independence and for some prevents them entering into statutory service provision.</p>
Q3	<p>How can we ensure that local allocation of funding by local authorities matches local need for supported housing across all client groups?</p>
	<p>There is a need for new commissioning structure that brings local authorities together with local partners (Health, Criminal Justice, DWP) who benefit from the outcomes from supported or sheltered housing.</p> <p>Critical to meeting local need for supported housing is appropriate use of the funding, understanding the outcome for the person and not working on a cost per person scenario. It would be detrimental to focus funding to only those with complex or high levels of support needs. Provision of low level support assists with the prevention agenda and should be increased. If this is overlooked the impact will be to ultimately place more demand on a finite resource.</p> <p>Again, using evidence to support all decisions about matching allocation of funding to local need is key. There will be local data from a variety of sources to collate evidence, for example from local Housing Strategies, Kent Accommodation Strategy, Housing Benefit departments and the Department for Work and Pensions.</p>

	<p>In addition to evidencing current and future need for sufficient allocation of funding across all client groups, it is imperative that there needs to be growth forecast into the funding allocation to sustain the level of transformation required and support better outcomes for people needing care and support.</p> <p>An unintended consequence of uncertainty about future funding is that some providers have (and others will) leave the supported housing field, leaving commissioners with a reduced pool of potential partners. There are some providers who are subsiding supported housing to maintain provision, however there are still providers who are keen to work with social care commissioners to develop future services and new innovative service models but to do this they, their boards and lenders need certainty about future available funds.</p> <p>Therefore providing a ring-fenced pot, with certainty about its future, will give developers and providers the platform they need to work collaboratively with the upper tier and lower tier authority, as a strategic commissioner, to realise the transformation required.</p>
Q4	Do you think other funding protections for vulnerable groups, beyond the ring-fence, are needed to provide fair access to funding for all client groups, including those without existing statutory duties (including for example the case for any new statutory duties or any other sort of statutory provision)?
	We do not think this will address the issue and will limit the opportunities locally to respond flexibly to changing local need. It could also result in only those considered to be the most vulnerable being rehoused. Furthermore, additional statutory duties on the Housing Authority are unlikely to be tenable given that they will already be faced with increased financial pressures in order to meet the obligations contained within the Homelessness Reduction Bill and any further statutory obligations without the level of required funding being made available would not achieve the desired outcomes.
Q5	What expectations should there be for local roles and responsibilities? What planning, commissioning and partnership and monitoring arrangements might be necessary, both nationally and locally?
	We would advocate a "Multi-Disciplinary Commissioning Body" approach similar to that under the Supporting People regime. There is a need to ensure that all local partners play their part in funding and commissioning supported accommodation. The establishment of a national framework would support the aim to monitor outcomes and ensure value for money is achieved from within the fund; provide a platform to reflect regional differences with regards to income levels and how the daily running costs of supported housing vary between more and less affluent areas of the country. Any arrangements agreed will have to take account of the changing needs of all vulnerable client groups. However, scope to enable local variations would need to be built into any framework.
Q6	For local authority respondents, what administrative impact and specific tasks might this new role involve for your local authority?
	Administration of the fund should be managed at lower tier authority and as such

	it would make sense for the funding to be processed. Quality and value for money would need to be regularly reviewed and it should be recognised by government additional capacity may be required as well as additional funding for processing the top up.
Q7	We welcome your views on what features the new model should include to provide greater oversight and assurance to tax payers that supported housing services are providing value for money, are of good quality and are delivering outcomes for individual tenants?
	There is already a wealth of evidence that supported housing provides good outcomes and value for money and the benefits it achieves to the wider public purse. This should be reflected in any monitoring exercise, rather than it being viewed primarily as an administrative task.
Q8	We are interested in your views on how to strike a balance between local flexibility and provider/developer certainty and simplicity. What features should the funding model have to provide greater certainty to providers and in particular, developers of new supply?
	<p>Our Registered Housing Providers and Developer partners are overwhelmingly feeding back that without funding being secured for a considerable period of time, existing, new and pipe-line schemes will not be viable or give them the assurances and confidence they need to continue to invest, build and manage supported housing schemes</p> <p>Government should reconsider its decision around linking rents to the local housing allowance as that creates a very uneven playing field across areas, even though the costs of physically providing supported accommodation do not substantially vary in a similar manner.</p> <p>Longer term investment and contracts will provide greater confidence to the provider to develop services, along with reassurance from Government that the initial funding pot will not reduce, as has been the experience of historical funding streams, e.g. supporting people.</p> <p>Additionally, more freedom to include welfare activities and/or services in addition to the support service would be aspirational, as the current supporting people regime is very restrictive in terms of what can and cannot be provided. If we are aiming to keep people independent in their own homes for as long as possible then we must also be interested in their welfare, as this impacts greatly upon their daily living skills and their need for care and health services.</p>
Q9	Should there be a national statement of expectations or national commissioning framework within which local areas tailor their funding? How should this work with existing commissioning arrangements, for example across health and social care, and how would we ensure it was followed?

	<p>A national commissioning framework that localities could choose to access for particular needs within their area would be the most straightforward approach locally, especially if inspection and scrutiny was also carried out at a national level. However as mentioned previously, this is likely to exclude local providers and smaller third sector organisations who often have strong commitment to the localities they serve and who can bring additional social capital beyond just accommodation. Therefore frameworks of expectation need to be national in scope but with flexibility for regional variations.</p>
Q10	<p>The Government wants a smooth transition to the new funding arrangement on 1 April 2019. What transitional arrangements might be helpful in supporting the transition to the new regime?</p> <p>Sufficient time and resources, coupled with a clear vision and process is required to ensure a smooth transition. Clarity and more detail about the new funding model is required to plan effectively for the transition, with protection for existing tenants who are in supported housing based on the current funding model.</p> <p>The existing timetable appears impractical and unworkable, and does not take into account the scale of work to affect change within this sector, particularly given the inclusion of sheltered housing and the appropriate amount of consideration this group alone should be given.</p> <p>Therefore, an agreed timely phased approach is favoured, working to ensure that existing support services continue, without detriment, during transition. Government could consider using a pilot area to test the transition arrangement, to identify and mitigate any unintended consequences, adapting and changing the process where appropriate.</p>
Q11	<p>Do you have any other views about how the local top-up model can be designed to ensure it works for tenants, commissioners, providers and developers?</p> <p>Funding needs to be stable and certain for a sufficiently long period to encourage investment or Central Government will need to agree to underwrite reasonable losses if the funding framework changes again in a defined time period. It would be helpful if assurances can be given from the outset that the ring fence will not be lifted in the future.</p> <p>If short-term accommodation is, as suggested, to be funded through the Universal Credit system then there needs to be assurances that not only will this cover the costs of such accommodation but will do so in a timely manner.</p> <p>There also needs to be recognition that tenants are all vulnerable and the consequences of them not receiving adequate funding are serious in terms of debt, evictions and homelessness.</p> <p>It is critical that other budgets, which are already under strain, are not impacted by a local top-up model and that any changes implemented do not present a risk</p>

	to other services e.g. Homelessness, Adult Social Care, or Public Health. There should be no expectation that local authorities will be able to underwrite or fund any shortfall in funding or resources.
Q12	We welcome your views on how emergency and short term accommodation should be defined and how funding should be provided outside Universal Credit. How should funding be provided for tenants in these situations?
	There should most definitely be a separate pot of ring-fenced money, held and administered by local authority homeless teams in each second tier LA which would allow for immediate access to funding in emergency situations.