



**Department for Work and Pensions and Department of Health consultation:
'Improving Lives: The Work, Health and Disability Green Paper'**

Homeless Link submission - February 2017

Introduction

Homeless Link, incorporating Sitra, is the national membership charity for organisations working directly with people who become homeless in England. Sitra is the membership body for organisations in the supported housing, health and social care sectors. With over 800 members, we work to make services better through training and consultancy and campaign on a national level for policy change. Together we believe we can end homelessness and ensure that everyone has a place to call home and the support they need to keep it.

Homeless Link is also part of the Making Every Adult Matter (MEAM), a coalition with Clinks and Mind formed to improve policy and services for people with multiple needs. People with multiple needs face a combination of problems including homelessness, substance abuse, contact with the criminal justice system and mental ill health. Together the charities represent over 1,300 frontline organisations and have an interest in the criminal justice, substance misuse, homelessness and mental health sectors. Working together, the MEAM coalition charities support local areas across England to develop effective, coordinated approaches to multiple needs that can increase wellbeing, reduce costs to public services and improve people's lives.

There is evidence of employment programmes and support failing to identify and recognise the barriers to employment faced by people experiencing homelessness, many of whom have mental health problems. We are, therefore, glad the Department of Work and Pensions and the Department for Health is looking to more effectively integrate the health and social care and welfare systems to help disabled people and people with long-term health conditions move into and remain in sustainable employment.

Our response has been informed by our "Expert Panel" and "Champions Groups" which are made-up of people with lived experience of homelessness. Most of the individuals in these groups have experience of receiving employment support in the past and they will be impacted by any changes in the future delivery of employment support.

Homeless Link has a long history of working constructively with the Department of Work and Pensions (DWP) on issues pertaining to homelessness and employment and welcomes the opportunity to respond to the consultation.

Overview

Lack of work is a major cause and consequence of homelessness, eroding skills and self-esteem and acting as a practical obstacle to finding and keeping a home. It is not acceptable that 80% of people who have experienced homelessness or housing issues want to work, however only 10% of people who are homeless are in work and only 23% are in education or training programmes.¹ A welfare system that supports individuals who can work get to get a job and reduce the risk of becoming homeless, and incentivises agencies to prioritise their needs, should be a priority action for Government.²

A lack of a stable and settled home makes it extremely difficult to find and maintain employment. With the right help, which identifies and recognises the barriers to employment faced by many people experiencing homelessness, homeless people can be supported into sustainable employment.

We are pleased to see the Green Paper recognises that a person's health and employment is affected by the conditions and environments in which they live, and that while employment rates can be as low as 16% for people with mental health conditions who live in social housing, for disabled people who live in a mortgaged house and who have 1 or 2 health conditions, the employment rate is as high as 80%. However there is strong evidence, including from the Work and Pensions Select Committee and the Public Accounts Committee, that the employment support on offer is failing those who are vulnerable and furthest from employment. Research has found that of people experiencing homelessness on the Work Programme, 58% said that their barriers to employment were not identified by their advisor and less than a third felt optimistic about their chance of finding work.³ **We welcome the Government's aim that people should be able to access 'appropriate, personalised and integrated support at the earliest opportunity, which focuses on what they can do, builds on their talents and addresses their individual needs.'**⁴

Multiple needs

Homelessness can create or exacerbate a broad range of other issues which act as barriers to employment. 28% of homeless people have complex needs; over 70% have mental health problems, and around a third have needs around substance misuse.⁴ Homeless people are twice as likely to have a diagnosable mental illness

¹ Homeless Link (2014) *Making the Difference: the strategic plan to end homelessness 2015-2020*

² *ibid*

³ Crisis, Homeless Link and St Mungo's, (2012) *The Programme's Not Working: Experiences of homeless people on the Work Programme*

⁴ Homeless Link (2014) *The Unhealthy State of Homelessness*

as the general population.⁵ In August 2014 only 58% of people in contact with secondary mental health services were recorded as being in settled accommodation.⁶

People struggling with more than one complex problem are routinely failed by services. Most public services are designed to deal with one problem at a time and to support people with single, severe conditions. As a result, professionals often see people with multiple needs (some of which may fall below service thresholds) as 'hard to reach' or 'not my problem'. Facing multiple problems that exacerbate each other, and lacking effective support from services, people easily end up in a downward spiral of mental ill health, drug and alcohol problems, crime and homelessness. **We, therefore, welcome the Government's recognition that 'efforts to help disabled people and those with long-term health conditions have been hindered by a lack of vision and by systems which fail to join up and take people's needs properly into account' and that people may need a wide range of support, through different agencies working in partnership, to address all of the connected and overlapping problems they face.'**

In terms of the specific questions in the consultation, we have focused our response on the ones relating to supporting people into work, and creating the right environment to join up work and health, where we feel we can offer a particular homelessness and multiple needs perspective. Some of our members, who deliver innovative and evidence based support to improve employment outcomes for homeless people, will also be responding with details of the support they provide.

⁵ Sian Rees (2009) *Mental Ill Health in the Adult Single Homeless Population: A Review Of The Literature*

⁶ The Commission to review the provision of acute inpatient psychiatric care for adults (2016) *Old Problems, New Solutions: Improving Acute Psychiatric Care for Adults in England*

Supporting people into work

Our manifesto⁷, based on the views of people who have experienced homelessness in England and those who support them, called for better quality specialist employment support for those in the greatest need, and investment in pre- and post-employment support programmes to improve opportunities for people to find work, and also sustain it. We therefore welcome that Government is seeking to identify the most effective support based on a person's circumstances and the capabilities required in Jobcentre Plus to deliver these interventions.

How do we ensure that Jobcentres can support the provision of the right personal support at the right time for individuals?

The Green Paper recognises that a person's health and employment is affected by the conditions and environments in which they live. However, research⁸ has found that Jobcentre Plus does not always identify people as homeless at their initial assessment when they open a benefit claim. This can result in low levels of jobseeker engagement and support needs can escalate quickly if not addressed early on.

Identification that people are homeless or at risk of homelessness is crucial to triggering payment exemptions under Universal Credit. Homeless people are in the group considered by DWP to be very likely to need payment exemptions. These exemptions allow the housing element of Universal Credit to be paid to the landlord, split payments, and more frequent payment cycles. Failure to be appropriately placed in this group can lead to rent arrears, leading to possible eviction, and make it much harder to take steps to find work.

Further, failure to identify people as homeless can lead to these people being disproportionately sanctioned compared to other claimants. Our research has shown that a third of homeless people claiming Jobseekers Allowance and one in five claiming Employment and Support Allowance have been sanctioned, compared to just three per cent of all people in receipt of these benefits.⁹ Sanctions can leave homeless people, who are already on very low incomes and coping with difficult life circumstances, without enough funds to cover their most basic needs.

⁷ Homeless Link (2014) *Making the Difference: the strategic plan to end homelessness 2015-2020*

⁸ Crisis, Homeless Link and St Mungo's, (2012) *The Programme's Not Working: Experiences of homeless people on the Work Programme*

⁹ Homeless Link (2013) *A High Cost to Pay*

Homeless Link has a number of recommendations, based on our work with other homelessness charities and employment services, to ensure that the right support is provided to homeless people,¹⁰ or those at risk of homelessness:

- **As the assessment process is considered critical to ensuring jobseekers receive the most appropriate support to meet their needs, any initial assessment process for support should identify jobseekers who are homeless or at risk of homelessness.**
- **Homelessness should be incorporated into an official assessment framework, used by Jobcentre Plus and incorporated into guidance for any employment support providers that deliver their own assessment. This must identify an individual's support needs in relation to housing, as well as their employability and capability to work.**
- **Regular reviews and an effective feedback loop to update the initial assessment findings should also include housing as people's support needs change over time.**
- **The assessment criteria should reflect all forms of homelessness, not just rough sleeping. This includes people living in hostels, supported housing projects, shelters or refuges, as well as those sleeping on friends' or family's floors, squatting or living in Temporary Accommodation. Assessments should also recognise that people at risk of losing their accommodation may also face significant obstacles to gaining employment and may require specialist housing support.**
- **Benefits claims forms should ask people whether they are homeless, and/or live in supported accommodation, such as a hostel. When reviewing a benefit claim, Jobcentre Plus staff need to know whether a provided address is supported accommodation.**
- **Jobseekers should be made aware of the importance of disclosing any change in their housing situation in order to prevent a sanction being issued unfairly.**
- **As well as identifying whether someone is homeless or at risk of homelessness, support provided should be tailored and take account of someone's housing situation.**

¹⁰ ERSA, Crisis, Homeless Link, St Mungo's (2015) *Supporting homeless people into work: recommendations for the future of Government-led employment support*

- **The activities and support that homeless people are required to do should be meaningful and tailored to their individual circumstances.**
- **Any mandated activity should take into account the impact of someone's housing situation, and any other complex needs, on their ability to effectively seek or prepare for work; only conditions that an individual can meet should be imposed.**

People who are homeless or at risk of homelessness may require support around tenancy sustainment, resettlement into secure accommodation, disclosing housing circumstances to potential employers, securing documents to prove identity and to claim in work benefits. Whilst mainstream provision supports some jobseekers with housing needs, those that have more acute housing needs require more intensive support.

- **Such support should be reflected within any commissioning of employment support so that housing support organisations are present in future delivery models. Guidance on assessing housing needs should be issued to all assessors. Former and current clients of homelessness services should be given the opportunity to feed into the drafting of this guidance. It should emphasise that certain groups are more likely to be homeless or at risk of becoming homeless, including care leavers, ex-offenders, refugees or those with physical and mental health conditions, and that assessors should build a secure and trusting relationship to help identify such support needs.**

What specialist tools or support should we provide to work coaches to help them work with disabled people and people with health conditions?

The role of the Work Coach as proposed in the Green Paper is varied and requires high levels of specialist expertise. It is helpful to hear that the Government has introduced an accredited learning journey for work coaches, and from 2017, will introduce an enhanced training offer 'which better enables work coaches to support people with mental health conditions and more confidently engage with employers on the issue of mental health.'

Homeless Link has identified a number of skills which will be required to support work coaches in their work:

Ability to identify people who experience homelessness

As we have already noted, we have learned from discussions with several homelessness service providers that many people who are homeless - including a number of people who are actually sleeping rough on the streets - are not being identified as such by Jobcentre Plus (JCP).¹¹ As previously noted, identification is crucial to ensure people are able to make use of Alternative Payment Arrangements and are not inappropriately sanctioned.

JCP staff can face considerable barriers in identifying people who experience homelessness. Not all jobseekers are able or willing to reveal their housing situation and many may not self-identify as homeless if they are not sleeping rough. People may also be reluctant to disclose their situation due to the stigma associated with homelessness and a lack of trust in officials. **Work Coaches should therefore undertake specific training in order to develop the skills needed to identify housing support requirements. Further, to encourage disclosure a change in the physical environment and layout of many offices may be required. Increasing privacy may encourage claimants to disclose issues of a highly personal and sensitive nature.**

A sensitive and non-judgmental approach

Previous research has highlighted a mixed picture relating to the standards of service people have experienced on the Work Programme.¹² Some people had been treated well, with respect and reported that it has been easy to access and talk to advisers. Sensitivity was raised as an important quality for advisers to have. However, many more homeless people did not feel that they have been treated well by providers and advisers; 58 per cent of homeless people surveyed by Crisis/St Mungo's did not feel they were treated with dignity and respect by their Work

¹¹ Crisis, Homeless Link and St Mungo's, (2012) *The Programme's Not Working: Experiences of homeless people on the Work Programme*

¹² *ibid*

Programme provider. Many of the people that we spoke to had been largely ignored by their providers.

Homelessness agencies have spent many years trying to make clients feel safe, communicating with them in a way that encourages them to be open and honest. **Homeless Link recommends work coaches engage with homelessness agencies in their locality to develop stronger joint working, as well as skills around sensitive communication with homeless people.**

Case Study – Brighton and Hove Working Together Initiative

Homelessness agencies were initially working with their local JCP to improve communication and make better use of “vulnerability markers” on the DWP systems to avoid homeless people being inappropriately penalised.

A “Task and Finish Group” was set-up as part of this initiative, which developed into wider partnership working between homelessness agencies, the local authority and DWP. Together they have tried to find ways of increasing employability and skills amongst vulnerable people. This has included accessing DWP grant-funded programmes to help homeless customers in the city.

An understanding of the experience of people with multiple needs

MEAM has previously¹³ called for public bodies and services to review their training for all practitioners coming into contact with people with multiple needs so that they are able to understand their experiences. From conversations around the country with 50 people who either have experience of multiple needs or are practitioners supporting those who do, it was found that many people felt that Jobcentre Plus providers did not fully understand what multiple needs are or how to support people experiencing them. This will be crucial, otherwise support provided for someone could potentially go against their other support or recovery plans

Understanding particular rules around Housing Benefit

It is imperative that JCP staff, including Work Coaches, are trained and informed of the particular rules around paying Housing Benefit in Specified Accommodation (the technical term for supported housing). Despite these regulations having been published two years ago, evidence is that understanding is limited.

Understanding of sanctioning guidance

¹³ MEAM (2015) *Solutions from the Frontline*

We recommend that providers and Jobcentre Plus staff involved in employment support do more to consider people's vulnerabilities before they are sanctioned. The current and future sanctioning guidance for Employment and Support Allowance (ESA) claimants ensures that the current Work Programme providers recognise that an individual's work preparation requirements will continue to be tailored to the claimant's needs and circumstances and must be reasonable for the individual claimant. As only reasonable requirements will be set, this will help to ensure that sanctions are not applied inappropriately. The DWP should extend the existing ESA duty to consider an individual's vulnerability prior to raising a compliance doubt so that it also applies to the JSA Early Access group.

Understanding of easement rules

In 2014, an easement was added to the benefit system to help reduce the number of newly homeless people being inappropriately sanctioned. Data from Homeless Link has found that this has been very successful in areas where it has been implemented. Yet, in many places, awareness amongst JCP staff of the change seems limited.

'Easement' rules, allowing some newly homeless people to have their work conditionality requirements lifted while they take steps to find housing, should be better publicised and understood by work coaches. Further, the use of these rules should be evaluated to make sure they are being applied appropriately and consistently.

Provision of digital support where appropriate to homeless people

Homeless people will often have limited access to computers and will not always possess the requisite skills necessary to undertake the process of claiming UC online. Significantly, according to the Office for National Statistics, this problem impacts on a large section of the population, with 7.1 million UK adults having never used the internet.¹⁴ Homeless people can also experience barriers such as a lack of experience, poor qualifications and low levels of basic skills. For example, a St Mungo's survey in 2010 found that 52 per cent of clients needed literacy support to find work. Crisis also found that 60 per cent of homeless people have low or no qualifications, putting over 80 per cent of job vacancies beyond reach. 37 per cent of homeless people have no qualifications whatsoever.¹⁵

¹⁴ http://www.ons.gov.uk/ons/dcp171778_310435.pdf

¹⁵ Crisis, "Work and Skills" <http://www.crisis.org.uk/pages/work-and-skills.html>

In addition to problems around access and skills, people with cognitive impairments,¹⁶ or who lead chaotic lifestyles,¹⁷ can also experience problems remembering basic information, including passwords. For those who are unable to rely on support from family, friends or outside help these issues take on increased significance. If unaddressed they will have potentially serious consequences on peoples' abilities to maintain their claims.

Although a key policy aim of Universal Credit is to change households' relationship with the benefit system so they become more accustomed to digital communication and budgeting as part of preparation for paid employment, there are a number of risks contained within models of this kind for vulnerable people. Crucially one of these key risks is the build-up of arrears, leading to increased risk of eviction. **As the role of the work coach is to advise individuals about other types of support in their local area, we welcome that this includes 'assist(ing) people with their financial and digital capability throughout the life of their claim.'**

¹⁶ Research by Homeless Link suggests that incidences of bipolar disorder, schizophrenia personality disorder and post-traumatic stress disorder are much higher amongst homeless people than the general population: [The unhealthy state of homelessness](#), Homeless Link (2014)

¹⁷ [Hard Edges: Mapping Severe and Multiple Disadvantage in England](#), the Lankelly Chase Foundation (2015) indicates that around 58,000 people a year lead chaotic lives due to overlapping needs related to homelessness, substance misuse and contact with Criminal Justice System.

Should we offer targeted health and employment support to individuals in the Support Group, and Universal Credit equivalent, where appropriate?

We welcome that proposals in the Green Paper 'do not aim to reduce the amount of benefit those in the Support Group (or the Limited Capability for Work and Work-Related Activity Group in Universal Credit) receive or to change the conditions of entitlement.' However, the Green Paper also makes reference to exploring a voluntary or mandatory keep-in-touch appointment.

As noted, sanctions are disproportionately applied to homeless people. Homeless Link has concerns over any extension of sanctions and conditionality to people in the Support Group. Given that these people have already been assessed as too unwell to take steps towards work, conditionality will be unrealistic and disproportionate. Any support that people in this group are offered should be entirely voluntary and sensitive to their health needs.

Creating the right environment to join up work and health

How can we best encourage innovation through local networks, including promoting models of joint working such as co-location, to improve health and work outcomes?

Evidence has shown that better coordinated interventions from statutory and voluntary agencies can reduce the cost of wider service use for people with multiple and complex needs by over a quarter. MEAM currently supports 27 areas across the country to improve local responses for people experiencing multiple needs. Fifteen of these areas are using the MEAM Approach – a nonprescriptive framework to help local areas design and deliver better coordinated services.

Although each MEAM Approach area delivers differently, all bring together a partnership of voluntary and statutory agencies that commit to designing a coordinated and flexible response for people experiencing multiple and complex needs. In many MEAM Approach areas, for instance Sunderland and Basingstoke, the partnership is led by the housing department of the local authority, and has helped them to create strong strategic and operational links with other agencies.

By exploring the accountability, financial and outcome-based levers at its disposal, government can incentivise and support local areas to take co-ordinated action. The best elements of programmes such as Troubled Families, the Better Care Fund and Total Place could be combined to create the vehicle for achieving this.

Local areas should be made accountable for delivering effective, joined-up services for people with multiple complex needs, including the development of multiple needs strategies in each local area. The voluntary sector should be fully involved in planning and implementation.

To enable a multi-agency approach between the employment support sector and specialist services, data sharing policies should be established and work targets and cultures between providers and housing departments within local authorities and Universal Support should be better aligned.

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