Impact of Out-of-Area Homelessness Placements into Kent
Briefing for Kent MPs by Kent Council Leaders and the Kent Housing Group

Kent Council Leaders wish to urgently bring forward recommendations to prevent, or better manage, the movement of people who require temporary housing from London Boroughs into Kent. This paper provides the context in Kent and suggests recommendations including the introduction of formal controls to ensure safe and successful transition of households into areas that have the resources and infrastructure to ensure sustainable integration for the households with good outcomes. Leaders also request a more equitable distribution of resources (access to accommodation and financial provision). In this briefing we set out potential actions for Government, and also how we are intending to work with London Councils.

Summary

In summer 2016 the London Boroughs of Redbridge, Newham and Waltham Forest leased a large number of units within Kent to use as temporary housing (Howe Barracks and Star House). While individual placements have been made in Kent for many years this large scale concentrated movement is a significant step change which brings specific challenges.

The transfer of homeless populations from London into Kent impacts the local accommodation market (in terms of cost) and the availability of housing for local authorities. With much higher temporary housing budgets, London Boroughs are able to significantly outbid local areas, raising local temporary accommodation prices and causing a ripple effect as local homeless families then also have to be housed further afield.

The case studies show that the families moving into Kent have above-average vulnerability, as a group, requiring higher than average levels of health, health visitor, social services and police input in addition to the school places and other public services required by any resident family.

We have found that little or no attention is being given by the placing authority to the availability of school places placing substantial strain on local school places and other local services. While notification processes are often, but not always, in place, placing authorities do not give enough information around the vulnerability of the families moving into accommodation, therefore services such as Specialist Children's Services (including social services) and Health Visitors often do not have the family-specific information necessary to meet the families' needs.

We have specific suggestions for Government action which include:

Notification of Placements

- Make it compulsory for placing authorities to notify receiving authorities in advance that they are making a placement and to provide appropriate information about the household, particularly around statutory interventions such as social care, domestic abuse and need for school places.

Financial Support following Placements

- An apportionment of Local Housing Allowance payments should be made by the placing authority to the host authority to mitigate the costs of the 'wrap around' services provided by the host authority, and to level the financial playing field.

Securing a proportion of any large-scale housing development purchased for the host authority

- Where London Boroughs purchase housing developments for homeless families, there should be a requirement for a certain percentage of the units to be allocated to local homeless families.

We also intend to work with the London Councils to make the above suggestions work on a voluntary basis with immediate effect.

Background

In May 2016, London Borough of Redbridge announced that they had secured a lease deal to house 200 homeless households at Howe Army Barracks in Canterbury in accommodation vacated by the Army. Shortly after, London Borough of Newham and London Borough of Waltham Forrest procured Star House, a converted office block consisting of 44 units in the centre of Maidstone, to house homeless households. **The unit price being paid is significantly below unit prices in London**, and in the case of Star House, significantly below unit prices being paid by Maidstone. Canterbury City Council and Maidstone Borough Council would themselves have been interested in securing Howe Barracks and Star House for local residents as both face acute shortages of accommodation, however Canterbury were outbid by Redbridge, and Maidstone were not offered the opportunity to bid for accommodation (although they have subsequently secured the use of 6 units from Newham).

The current market in which local housing authorities operate is not a level playing field. The London authorities have an inherent advantage through the financial support provided by grants from central government e.g. the Homelessness Prevention Fund and the Temporary Accommodation Management Fee. Historically these grants have been disproportionately higher settlements and often include a London weighting to reflect the higher cost of renting in London. This remains the case even when the London authority acquires accommodation in cheaper areas outside of their Borough i.e. Kent. In addition if the London authorities use the inner London Benefit Cap figure of £23k they would be able to charge a higher rent than could be achieved by their Kent equivalents by allowing more benefit to be paid without being 'capped'.

Additionally as a result of amendments to the General Permitted Development Order 1995 in May 2013, there is now no need for developers to apply for change of use when converting office to residential, instead this can be completed under permitted development, as with Star House. With large amounts of vacant office space available across the county, and demand for affordable temporary housing so acute, properties like Star House will inevitably become attractive for conversion either by the owner, by specialist companies, or by Local Authorities themselves. **There is intelligence that multiple London Boroughs are now looking to source similar sites across Kent, setting aside large capital budgets and reserves to apply rapid relief to their steadily growing spend on temporary accommodation,** effectively subsidised by the aforementioned enhanced payments for London authorities even when they are placing outside of the capital. This includes areas of West Kent not previously accustomed to such placements. The trend is definitely on the rise - only last week Westminster City Council sought to 'catalyse this debate', their Cabinet Member for Housing writing an open letter in the press unapologetically concluding that it is 'unsustainable' for Central London Boroughs to continue to house homeless families in their own areas.

This is set against a backdrop of an already **falling supply of private rented dwellings available at the Local Housing Allowance rates for Kent residents,** due to increased demand from private sector tenants resulting in rapidly increasing rents, discrimination by landlords against benefit tenants, and buy-to-let landlords leaving the sector due to changes in tax regulation. Therefore the London Boroughs are squeezing an already diminishing market, and it is becoming impossible for Kent Local Authorities to meet the 6-week maximum stay for families in temporary accommodation in Bed & Breakfast. This in turn could cause a ripple effect, with Kent families being placed further afield and out of county.

Natural migration from London to Kent alongside procurement by agencies of smaller premises has been happening for decades, and although likely to continue, it is part of demographic evolution as London grows and the price differential between London and Kent increases. However the acquisition of large developments such as Howe Barracks and Star House present a **service challenge** and a **strategic risk** over and above the general increase in placements of homeless families which we have been concerned about for some years.

Action for Government

Potential areas to be included in the Homelessness Reduction Bill currently going through Parliament

Notification of Placements

- **Make it compulsory for placing authorities to notify in advance that they are making a placement**, and to provide appropriate information about the household, particularly around statutory interventions such as social care.
- **Placing authorities to liaise and receive confirmation from the area of placement that there is sufficient and appropriate support for the household**, for example school places in the local area, access to appropriate health services, for individuals with care or special educational needs, provision of that support must be available, and for individuals who have jobs, they must have a maximum of 60 minutes commuting time
- **Where placing authorities fail to notify and converse with other areas that there is an appropriate sanction**; for example a system of fines to be introduced or a pathway to allow timely legal action against a non-compliant placing authority.
- **Review and agree a Protocol that clearly sets out all of the above**, including details about placement longevity in an area.

Financial Support following Placements

- **An apportionment of Local Housing Allowance payments to receiving authorities, alongside placing authorities having financial responsibility for any 'wrap around' costs associated with a placement, for example children's services, adult social care or health costs.** The placement of homelessness households in Kent places a disproportionate strain on resources and puts the future funding and revenue streams for these services under question. This is not a sustainable financial situation for Kent County Council and other service providers to operate in. The full cost of necessary 'wrap around' services should be allocated upon placement out of area. London Boroughs currently receive 'enhanced payments' to assist with the higher cost of housing homeless families in the Capital. If they are then placing those families outside of London, the enhanced rates should be passed onto the receiving Local Authority.

Securing a proportion of any large scale housing development for the host authority

- **When London Boroughs, or other local authorities, purchase large scale housing development for homeless families (15 units or more is suggested), a minimum percentage should be allocated to local homeless households, if there is an acute lack of temporary accommodation locally.** This will ensure that Kent local authorities are able to place households to whom they have a statutory duty to support and house in their local area and at a more affordable cost, avoiding a ripple effect of out-of-area placements as capacity is taken and unit prices rise. This should become a requirement for such situations and not undertaken in an ad-hoc fashion, this would provide more stability and reassurance to Kent local authorities about their ability to accommodate families within their own local areas.

Action for Government: Increase and Promote the Supply of ALL Affordable Housing Tenures

- Although the Government aspiration to promote and provide people to access home-ownership is understood and supported, there is a need to reflect on the growing need for *all* affordable tenures to be in sufficient supply, including affordable rent products. Increasing the supply of affordable tenures that meet the needs of **all** low income households may assist with placements of homeless households within their local communities and provide sufficient move- on accommodation from expensive temporary accommodation.

Kent working with London Councils

Irrespective of potential Government action, we intend to work with London Councils to:

- Develop in partnership an agreed Out of Borough Placement Protocol for homelessness households, including notification of any potential access to resources, and where possible anticipated length of residency.
- Work with those London Boroughs who agree to the principles within the afore mentioned Protocol and who voluntarily contribute to the additional costs of services in the receiving authority, initially on a voluntary basis whilst there is lobbying to make the suggestions compulsory with sanctions for non-compliant authorities.

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(On behalf of the Kent Council Leaders and the Kent Housing Group)

Case Studies:

The placement of a large number of families in the summer of 2016 in Howe Barracks and Star House has given us an opportunity to gather evidence about their needs, and the way in which local services have responded, in a way that has not been possible with the hundreds of families that have been individually placed by London Boroughs in Kent over the last few years. We have therefore used Howe Barracks and Star House as case studies and have collected evidence in partnership with Districts, Kent County Council, CCGs and the Police. This suggests that homeless populations being placed within Kent by London Boroughs include families which require *significant* support by local services. The case studies highlight the following:

- While notification processes are often, but not always, in place, **placing authorities do not give enough information around the vulnerability of the families moving into accommodation.**
- Having a named contact between the placing and receiving authorities (Redbridge have done this in Howe Barracks) is helpful in aiding transparency and information sharing.
- The existing housing market is impacted directly through higher private rents. Local Housing authorities are unable to offer the same rates as London Boroughs which leads to a lack of housing for emerging households.
- Little or no attention is being given by the placing authority to the availability of school places and other local services.
- Local Authorities and Schools are being asked to provide school places at very short notice. This impacts children moving to the area, those already in school, parents and teachers. It also impacts places available for planned future developments. **In one case a primary school was asked to find 100 school places at very little notice**. There is also a cost for the receiving Local Authority:

Howe Barracks	Star House
Primary school (protection funding) **£263,627**	Primary school (protection funding) **£290,000**
Transport per year **£3210**	

- Health visiting teams have been impacted. In the case of Howe Barracks they were not notified of London placements, there was therefore an unexpected sudden increase in the demand for the service. The majority of support needs of families centred on language and school readiness. Demand for the service has now stabilised.
- Again in relation to Howe Barracks, local GP surgeries have had to accommodate the new families and some of the cohort require significant support due to deprivation and previous poor accommodation. This has included basic nutrition.
- Kent Children's Specialist Services are involved with families across both case studies. While in the case of Howe Barracks some of these cases were flagged by the London Borough, other cases have been referred by local services after the family has moved into Kent.
- Impacts on Community Safety have also been highlighted in relation to anti-social behaviour in Maidstone and community integration within Canterbury. Police have allocated considerable resource to aid community integration.

Case Study 1: Howe Barracks, Canterbury

The London Borough of Redbridge is in the process of housing 208 families at Howe Barracks in Canterbury. Families have been moving in since June 2016 in tranches. Redbridge has employed a Housing and Resettlement Advisor who has worked closely with families to aid the transition from London into Canterbury and worked with local services and the voluntary sector.

Demographics:

The demographics of households arrived to date from London Borough of Redbridge are as follows:

Age	Number
0-5	87
5-10	100
11-17	60
18-24	41
25+	147

Notification processes:

- Notification to the housing authority was given two to four weeks before placement.
- Redbridge has worked closely with Canterbury City Council, and has provided demographic information however this did not include details on issues such as domestic abuse or other vulnerabilities.

Local Housing impact:

- London Boroughs have the financial power to offer higher incentives to landlords than the local authority, this makes it very difficult for local housing authorities to compete in gaining access to local accommodation and therefore house their homeless locally.
- Local Housing Authorities also hold a duty to inspect properties if a complaint is raised.

Education:

The high and concentrated movement of large numbers of people with short notification period has concerning impacts for local schools and places acute pressure on specific schools in the area.

- Due to a shortage of local places 5 children are being bused from Canterbury to Whitstable to attend secondary school at a cost of **£642** per annum for each child
- Most children of primary age have been accommodated locally in 3 primary schools; however Protection Funding has been allocated by KCC to these 3 schools to support the cost of accommodating increased numbers at very short notice.
- One primary school has accommodated approximately 100 additional children. Additional teachers have been employed and more classes added.
- Protection funding has also been given to the local secondary school which has accommodated 28 children from Howe Barracks. Details on cost are included:

School	Cost
School 1 (primary)	£111,708
School 2 (primary)	£67,360
School 3 (primary)	£23,383.00
School 4 (secondary)	£61,176.00

- A development is currently being built close to Howe Barracks. When planning was given the local schools had capacity, now they do not and this will impact the places available for people moving into the area.
- A primary school was recently closed near to Howe Barracks. If more timely information was available then planning could take account of future school place needs.
- A shortage in nursery places has been reported
- Some families are presenting with English language needs, there is a shortage of English language classes in the area

Public health:

- Health Visitors are made aware of children (0-5) moving into the area via GPs, therefore are only notified of children whose families have registered.
- Health Visitors have been made aware of 43 pre-schoolers moving into Howe Barracks: this highlights that some families have not registered with GP surgeries and therefore Health Visitors do not yet have notification that they have moved to the area.
- Many families required some support particularly in relation to speech and language and school readiness. Speech and language services are oversubscribed so many families have joined a waiting list. Common issues also included helping children get out of nappies before starting school. This has involved a high number of additional visits from Health Visitors.
- While Health Visitors have been made aware of families which have had Social Services support they were not made aware of other areas of support or vulnerabilities such as those families experiencing domestic abuse.
- The local Children's Centre has organised special events which were also attended by local schools and school nurses.

Specialist Children's Services (including Social Services):

- 7 - 8 families with a total of 16 -18 children have been referred to KCC Specialist Children's Services. Concern has been raised by Kent County Council around information sharing. Some cases were opened before the family moved to the area, four families currently involve KCC staff.

Impact on Community Safety:

- The Borough Council has raised significant concerns around integration with the local community, with far right protests being held in the area. With longer notification processes, and more control over the timing of placements (avoiding where possible the summer period) the Borough may be able to do more to aid integration processes.
- The Police have allocated 2 PCSO's and a Community Liaison Officer overseen by a vulnerability constable to ensure that people feel welcome and to identify any potential issues. The Police have identified some 'challenging families' but argue that the upfront investment in the PCSO's has prevented any further escalation.
- Some issues around domestic violence have been identified, including a high-risk domestic abuse victim whose data was not shared with Kent Police thereby not affording the opportunity to put in place safeguarding mechanisms.

Impact on Health Services:

- The CCG in Canterbury report that one local GP surgery has been particularly affected in terms of registration numbers with a high number of families from Howe Barracks requiring significant support. The cohort has been affected by high deprivation and previous poor accommodation and the surgery are working with the families on issues such as nutrition. This has taken significant GP time.

Case Study 2: Star House, Maidstone

Newham and Waltham Forest are utilising 34 units in Star House in Maidstone with families moving in through-out the summer period (2016). Star House is converted Office accommodation.

Demographics:

Maidstone Borough Council has received 13 notifications for 34 units of housing. 6 units within Star House are utilised by Maidstone Borough Council.

The received notifications include the following:

Age	Number
0-5	11
5-10	5
10-15	1
15-18	2
18+	17
One not stated	

We know from school place information that there are at least 36 children between 4 and 7 (Reception to year 2).

Notification processes:

- Notification to the housing authority was given one or two days before placement
- Newham have provided the required information to Maidstone Borough Council, and have visited the Council prior to taking the properties, however, nothing has been received from Waltham Forest (who hold 50% of the 34 units).

Local Housing impact:

- London Boroughs have the financial power to offer higher incentives to landlords than the local authority, this makes it very difficult for local housing authorities to compete in gaining access to local accommodation and therefore house their homeless locally.
- The units within Star House are in very good condition, however if future placements are made in units which are not to the same standard and a complaint is made the local housing authority has a duty to inspect at its own cost and resources.

Education:

The movement of large numbers of people into a concentrated space with short notification period has concerning impacts for local schools and places acute pressure on specific schools in the area.

- Two primary schools have been expanded in-year to provide temporary additional infant class places. The total cost of these expansions is estimated as:

Capital	Revenue
£200,000	£90,000

- Had more timely information been available, these expansions could have been implemented as planned and coordinated proposals, at reduced cost and with less disruption to the schools and their pupils, staff and parents.

Specialist Children's Services (including Social Services):

- KCC has 3 cases within Star House. Referrals have come from the Police and from Health Visitors. No information was previously received from London Boroughs on the vulnerability of these families. Therefore the cost of these cases is held by KCC.
- Victims of Domestic Violence who approach their council for housing may be referred on to another London Borough. Specialist Children's Services are aware of families which appear to have come from one borough but have been referred originally from others. More information to Specialist Children's Services when families move into the area would help the service identify vulnerable families quickly.

Antisocial behaviour:

- Incidents of Anti-Social Behaviour have been reported to Maidstone Borough Council.

Impact on health

- GPs are under great pressure in the area.
- Some families are unable to register with GPs. Feedback from services suggests that GP surgeries in the town centre are not always taking patients from Star House as they are being housed temporarily. Maidstone Borough Council and the CCG are working to establish health pathways.