

Supported Housing Consultation response from the Cambridge sub regional Housing Board

Introduction

The Cambridge sub regional Housing Board represents all of the local authorities of Cambridgeshire, Peterborough and West Suffolk. The Board also has representation from partner housing associations and the LEP.

The following issues are a summary of the key matters discussed by the Board. Each local authority may wish to make its own individual response to the consultation.

Although the consultation singles out one aspect of supported housing funding, namely the support funded via HB, this is only one part of the “ecosystem”. Other factors such as the levels of LHA set, new emerging statutory duties, changing priorities, and changing markets, all have implications for the level of revenue and capital funding needed to meet our resident’s needs, now and in the future.

We want a system which helps plan in the long term – with housing provider boards looking for certainty 40 years in the future when new schemes are proposed – so this change in system needs to support and enable a really long time horizon if it is to improve providers confidence and get specialist and supported schemes off the drawing board.

Arising from a collective discussion between local partners we would like to contribute the following points to the debate:

Strengths / positives

- The proposed system can bring new levers to reduce the number of un-commissioned schemes being set up, with uncontrolled and un-benchmarked costs which have to be picked up via the housing benefit system.
- This new strategic overview of schemes would be positive for local residents and services, rather than relying on the free operation of the market, and could support closer collaboration by partners who are seeking the same overall outcome for residents.
- Our local *Transforming Lives* prevention approach has been key to local partners, preventing crisis in ways which are good value for money. This proves our collaborative approach and we would want to work together on a shared strategy and approach to supported housing schemes and all supported housing costs; and we would collaborate on setting local targets and standards to monitor, with minimum bureaucracy and infrastructure added.

Weaknesses / concerns

- We would like more clarity on the individual assessment of payments needed, vs. total pot “block” gap assessment. It sounds from the consultation document that there might be a top-up assessed for each individual claim, which would be a significant administrative challenge and a huge task. We think the gap should be assessed for a scheme or scheme type; if the service fits the criteria, costs should be topped up at the agreed scheme level, which would be set cooperatively between local partners. If not, we fear the administration of individual gap assessment could lead to the closure of schemes as there would be so little certainty for landlords/providers and could well render a scheme unviable.
- Costs vary a lot within our own area; we need do more to compare cost, need, demand, issue and service. This might give an opportunity to distribute resources more strategically. Can look at the need being met and help balance older people, getting people out of hospital, young peoples’ needs, statutory duties etc. Data is not easily obtainable on these cost and numbers, it would help to have more national open data on supported housing schemes, numbers, funding, costs, and quality measures to inform our approach.
- If the number of residents fluctuates for example if high level of voids in a foyer or such, it becomes more difficult, but we can set an agreed average or standard for types of scheme.

Foyers, refuges etc. running costs should not change much relative to occupancy, so block payments would work well to reduce admin and help provider know what they will be getting to feed into their business plans and provide certainty when assessing viability of new provision.

- Money following the client can be unattractive to providers due to administrative systems. Communal facilities are part of the package, if you start commissioning a number of hours of care per person, which is different for each client, it creates unnecessary complexity. Different care contracts are very tricky while tried and tested block contracts are more efficient i.e. payment for an amount of hours, don't have to count each hour for each person. The time taken to simply assess the funding gap could lead to an arrear building. This puts stress on the margins for providers.
- We would want to look at LHA and rent levels to assess the local gap, but a weakness of this system is that government can change the LHA rates so more or less people qualify (e.g. LHA rates frozen now, but might not be beyond 2020).
- We encourage the government to look "in the round" when other changes come in, not just looking at one part – e.g. rent policy, LHA rates, ways of setting rent. We want to be able to maximise the size of the pot so we can deal with it flexibly to maintain the schemes of highest priority locally, by taking an agreed, but not too rigid approach.

Opportunities

- As a new devolution area Cambridgeshire and Peterborough will be working together on shared issues, including housing in Devo1 and Social care and health in Devo2. These provide a great opportunity to share strategy, policy and practice around supported housing and its funding. If there are going to be national rules and framework, we are keen to know what they are so we can ensure these are the starting point for our local approach.
- We would seek to examine the relationship between this funding, and funding going into a scheme through our local housing-related support which has been protected by Cambs County Council, a situation not replicated across the country. It would help to bring the threads together from any previous funding streams.
- We would want to work together to help people when moving from one accommodation to another across our area.
- Could help with link to Better Care Fund and Sustainably Transformation Plans.
- Suggest we need a *duty to cooperate*, so we all work together on this and agree an approach together.

Threats

- We are not clear how the overall pot will be sized. Nationally appears to be £4.1bn as at the end of 2015. We are concerned that this is an underestimate as data might have been a little rushed. If it comes in April 2019, will need updated calculation, otherwise are going to be working on a 3 year old estimate.
- We are concerned about fragmentation – already there are separate streams proposed for short term accommodation and sheltered housing. We already have to manage funding in separate "pots" from county, health etc. and do not want to encourage increasing complexity and fragmentation.
- Specifically for emergency and short term accommodation, we think provision should be dealt with in one stream, not a separate line for emergency and short term. Hostels – can only get claims backdated more than 4 weeks, even if much larger arrears have built up under UC. Make sure get full HB while in emergency short term accommodation, not open ended but gives the chance to stabilise and move them on to longer term accommodation. These schemes can be very 'hand to mouth'. If we add complexity and admin it will not help them to survive.
- On the ringfence, we support its implementation but are concerned that previous ringfences have been lifted under the banner of enabling more local choice / prioritisation, but in effect this means funds can be reduced for areas where there are statutory priorities, and/or without a strong enough ringfence, only the statutory services (which can be expensive for

logical reasons) are prioritised which reduces the ability to get “upstream” through a mixed provision. There is a risk and danger that things like a floating support service will get deprioritised compared to statutory services.

- We are concerned that the new approach will take time and work to set up. Will then have to respond to new constraints. We appreciate the change is necessitated by the implementation of universal credit. But this creates issues for all organisations to manage, especially when county resources are limited. We want a local approach to avoid excess additional bureaucracy.

Suggestions

- We are not convinced of the need for a whole new system in our area. There are existing tools, methods and partnerships set up which we believe can be developed to cover the prioritisation and partnering approach needed to this specific piece of supported housing funding. Would be ideal to use the existing frameworks rather than invent a whole new structure.
- Don't assume all funding is aligned, we want to align but there may be different tasks, roles and statutory responsibilities and priorities for each partner
- We would seek the correct balance within each area / district / need group. We are continuing to work towards a principle of equity following a commissioning review, but are continuing to work towards the principle.
- We need to take an approach on delivering new schemes, balanced with maintaining existing; and to capital vs revenue funding. Should HCA get more capital to fund new schemes, alongside the revenue implication? HCA would need to consult on whether the revenue is supported or not. Need to keep an alignment, if the commissioning body agree the new scheme was needed.
- We would seek to predict need based on demographic and provision modelling. A national framework to do this might be helpful, or a set of toolkits to help local areas adopt a suitable, evidence based local approach.
- District duty to provide accommodation is worth bearing in mind. Would be great to take a partnership approach, similar to the SP commissioning body and provider forum. Admin grant supported the SP approach. We could try to replicate that here. Replicate the good, simplest and most useful bits. Will need an administrative support, in addition to baseline funds.
- We would prefer a decision making body across our area, similar to the old Supporting People commissioning body. This would include partner involvement and consultation. This body would ensure all areas are covered (statutory and non-statutory), and would help compare costs and models. Districts, providers and other partners could be involved, and CCGs & other health partners e.g. the health and wellbeing board.
- Health link is particularly critical, and mental health, drug/alcohol, because we are trying to provide an upstream service. If new schemes are not developed due to this change, will impact other partners heavily.
- **Refuges:** Women's Refuges also rely on there being a national network, it's not just about local provision. Would like to see refuges dealt with on a national basis. These are very much affected by the LHA cap. What if new duties arise, can't all have a separate pot?
- Quality monitoring as part of the commissioning process: providers could assure of quality, CQC system exists to give a drop in inspection, we'd need to be assured the outcomes and standards needed are being delivered. This could be via desktop and inspection, not disproportionate, not too costly and heavy weight. Proportionate monitoring process as part of the commissioning role.
- **Local views:** Local partners will share the data they have on sizing the pot in individual responses. We would like to highlight the following shared thoughts:
 - If a scheme was not capital funded, can impact on the costs which need to be met via revenue funding.
 - We would support the principle of a supported housing allowance, rather than using the LHA rate, which covers a huge geographic area while our housing markets are much more granular. This creates imbalances between settlements in the same

BRMA where housing costs are very different, so a local top up rate for different types of scheme or client group could prove much more effective and could help support new schemes in future if we can provide certainty of funding to suit the provider / developer.

- Sheltered housing / older people take quite a lot of funding, if parcelled into different packages might not allow change of model for provision. Could suggest a “new ideas” pot. Or one pot with more flexibility, less silos.
 - Need to think about costs now and in 5 and 10 years’ time, as this model need to apply in the long term.
- **Set-up** The April 2019 implementation deadline may mean not enough time to set up a national framework in time for LAs to set up the necessary processes. However helpful to have national guidance, what’s it trying to achieve, objectives etc. Need a national statement of expectations. We then convert that into local outcomes. Need a clear definition of the ring-fence. The individual or block top-up is crucial to this thinking. Would prefer broad guidance and not prescriptive.
 - **Transition:** Current schemes funded under old regime will come across at the start. Might need transitional funding to help people exit services re-shape the provision we have? It is necessary to help providers have a relationship in the future. Suggest a lead-up year. SP had an implementation period to size up the pot using transitional housing benefit - could treat this similarly, to provide clarity and identify how it stacks up, financially.

Future proofing

- Even if LAs get more / enough funding, there is still an issue for RPs – revenue funding in short term is not enough to support developing new schemes, funders see it as a risky business. Need more long term certainty to invest. Longer term future and stability. Otherwise it’s like the past schemes.
- Longer term certainty is needed for providers and developers of schemes. Would seek to give providers as much long term certainty as possible otherwise new supply will be limited. In 2019 we have a baseline position; for any new provision the budget should be increased so existing provision is not reduced. With growing older population, demand pressures will be enormous. Will need a national allowance for pop growth and additional demand on services. Fast growing county, will mean lots of growth in all types of population. Balance with the long term need for more housing.
- Needs to get through the RPs boards, certainty for much longer term is needed, maybe 30 years, to get their approval to provide the new accommodation needed. 40 year business plans for schemes, need to know there will be revenue support provided the scheme is still fit for purpose for the client group. Boards may look for an “exit strategy” but this does not really apply to all supported housing. Alternative provision is difficult, even with some self funders. Still have the same overhead. RPs would look for some assurance, allocate an amount of revenue, goes on the committed list for 10 or 20 years (working on the assumption that government will continue to ring-fence).

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10/2/17