

Appendix 2 - Funding for Supported Accommodation – Proposed Consultation Responses

Proposed responses – (highlighted in yellow)

Fair access to funding, the detailed design of the ring-fence and whether other protections are needed for particular client groups to ensure appropriate access to funding, including for those without existing statutory duties.

Local authorities will administer the local top-up, and in two tier areas, there is a case for the upper-tier local authority to hold the funding as they tend to be responsible for commissioning the bulk of supported housing services.

Different types of supported housing provision and services are commissioned by different bodies locally, such as Clinical Commissioning Groups and district housing authorities. It will be important to ensure that funding streams are better aligned so they can deliver their respective commissioning objectives.

Q1. 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?

Pendle Council, as delivering body, would be able to take a much more localised, coherent approach to commissioning for needs across housing, health and social care than Lancashire County Council (LCC) as upper tier authority. LCC would be required to deliver services across twelve boroughs, each with potentially different needs. There is real risk this would lead to a 'one-size fits all' approach which would not meet the particular requirements of Pendle.

Pendle Council is best placed to understand local needs, in particular the inter-connection between housing and health issues within the borough. Working with local stakeholders to deliver a bottom up approach, will help drive transparency, quality and value for money from providers in the area. Savings will be delivered through undertaking a preventative approach ie by providing services at an early stage, may reduce use of expensive supported accommodation provision in the longer-term.

Pendle Council does have extensive experience of both managing a women's refuge (supported housing) and commissioning/monitoring by being an active member of the LCC Supporting People commissioning / steering group throughout its existence. It is felt therefore that taking on the role of delivering body would not pose any particular concerns.

It is therefore believed that in two tier authorities, the local district Council should hold the funding.

Q2. 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?

53. We will ring-fence the top-up fund to ensure it continues to support vulnerable people. We propose that the ring-fence should be set to cover expenditure on a general definition of supported housing provision, rather than there being separate ring-fenced pots for different client groups.

54. Many people who rely upon supported housing have multiple and complex needs and supported housing services often address a combination of these needs (e.g. homelessness, mental health issues and substance misuse problems) and therefore, breaking down funding between different client groups becomes complicated and could limit flexibility for local areas to manage changing circumstances. Local authorities will, of course, need to comply with the public sector equality duty under section 149 of the Equality Act 2010 when deciding how to allocate funding.

55. However, some stakeholders have raised concerns that certain vulnerable groups could be overlooked, or particular groups could be prioritised for funding at the expense of others. We are keen to understand what, if any, statutory provision could be made to provide reassurance, including what potential role additional statutory duties for local authorities in England could play, particularly in terms of protecting provision for specific vulnerable groups within the context of the overall ring-fence.

In order to ensure optimal outcomes, it is proposed that:-

- Government, at the earliest opportunity provide clear indication of the funding which will be made available
- The Council would undertake an extensive 'needs analysis' to ascertain prioritise for funding post- April 2019
- Council officers would deliver procurement and monitoring which would be reported to a 'steering group' comprising local stakeholders, which would oversee commissioning decisions.

This 'localised' approach would encourage collaboration across local agencies and encourage planning and commissioning across service boundaries, and ensuring that different local commissioning bodies can have fair access to funding. It would also better ensure that certain vulnerable groups would be less likely to be overlooked, than at county-wide level.

Q3. How can we ensure that local allocation of funding by local authorities matches local need for supported housing across all client groups?

As per Q2, the Council would undertake a local needs analysis and work with local stakeholders directly. This would provide the best opportunity for all local needs to be fully understood and thus actions could be taken on a local level to meet local needs.

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)?

II. Clarifying expectations for local roles and responsibilities, including what planning, commissioning and partnership arrangements might be necessary locally.

56. The new model will give local authorities in England an enhanced role in commissioning supported housing in their areas. In addition, local partnerships could combine this funding with existing care, support and supervision funding to commission services. This could be helpful in encouraging local authorities to consider all supported housing funding in the round. It should incentivise efficiencies and join up existing care and support funding, helping with health and social care integration across the life course.

57. We will consider what level of new burdens funding would be appropriate to enable local authorities to fulfil their new role.

A localised approach towards commissioning coupled with 'ring-fencing' of this funding would help enormously towards providing fair access to funding for all client groups. Localised decision-making would help to ensure that those without existing statutory duty would have more likelihood of being recognised and assessed.

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?

Whilst there needs to be room for a local approach towards planning and commissioning, it would be useful for comprehensive guidance to be made available nationally, particularly in terms of monitoring arrangements so that consistency is adhered to. The national qualitative assessment framework (QAF) used by many Councils for the Supporting People project may act as a useful start towards developing a national monitoring programme. However, the QAF process entailed huge staffing resource for both provider and in the administration of monitoring, therefore it is requested that the QAF itself be reduced significantly whilst retaining the most important parts.

Q6. For local authority respondents, what administrative impact and specific tasks might this new role involve for your local authority?

III. Confirming what further arrangements there should be to provide oversight and assurance for Government and taxpayers around ensuring value for money and quality outcomes focussed services.

Supported housing is of vital importance to vulnerable people and we want to continue to work with providers to ensure that services are as good as they can be. We want to build on the work of excellent providers to drive all quality and value for

money up to the level of the best. These reforms, giving local areas greater control and strategic oversight, represent the first step towards that goal, whilst giving the sector the necessary certainty over the total amount of funding available nationally. We also want quality and a focus on individual outcomes to play a greater role in how we fund the sector.

District Councils are ideally placed to deliver the new system within existing structures on a geographical level which makes assurance much easier to deliver. There will be an administrative impact initially in setting up steering / commissioning groups along with monitoring arrangements, but once systems are in place, it is expected that planning, commissioning and monitoring would not require significant resource. All services would be relatively accessible in comparison to upper tier authority level, whereby some services may be significant distance from centralised monitoring services.

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?

IV. Exploring the appropriate balance between local flexibility and provider certainty, including what other assurance can be provided beyond the ring-fence, for developers and investors to ensure a pipeline of new supply.

59. Providers have told us that within a localised funding model they would prefer a degree of standardisation with regards to the administration of a local top-up as well as the underpinning framework for reaching a funding decision – for example, via a national statement of expectations or a national commissioning framework. This is particularly important for larger providers who operate across many different local areas and would welcome a degree of standardisation and consistency. However, it is important to balance this against the need to preserve flexibility for local areas to design the delivery of the top-up in their area in a way which best meets the needs and circumstances of supporting vulnerable people in their areas.

As per Question 7, the localised approach by district Council would, whilst adhering to nationally set standards, ensure a more in-depth approach and greater oversight of services as they are in relative close proximity to centralised steering groups along with monitoring arrangements.

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?

One of the main barriers towards development of new supply is lack of certainty over a longer period with regards to future funding. Whilst the new system advises that the 'top-up' will be ring-fenced and set on the basis of current projections of future need, there is no timescale for how long the 'top-up' will be ring-fenced and how long

the 'top-up' will be set to cover future projections ie there is risk that the 'top-up' pot will be reduced over time. It is accepted that it is difficult to provide certainty of funding over a long period of time, but the greater the assurance that can be provided, the better.

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?

Guidance from government in terms of a national statement of expectations or national commissioning framework would be useful. The Council is ideally placed to deliver existing commissioning arrangements on a localised approach and is already participating in health and social care reform, particularly around prevention issues.

Q10. 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?

It would be useful for decisions to be taken at the earliest opportunity which would maximise lead-in times for both providers and the delivery body. It would also be useful for comprehensive guidance to be given broadly in terms of how government expects governance of the new system to be delivered. This would help with planning / commissioning and monitoring whilst allowing space for a localised approach to compliment national standards required. Early decision-making would also allow time for relationships to build between the local authority and providers, thus ensuring a more successful transition for April 2019.

Q11. 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?

V. Developing options for workable funding model(s) for short term accommodation, including hostels and refuges.

60. While we are confident that the local top up model will meet the needs of the majority of the sector, we recognise some particular challenges, such as the monthly payment of Universal Credit, may remain for very short term accommodation, including hostels and refuges. We will work with the sector to develop further options to ensure that providers of shorter term accommodation continue to receive appropriate funding for their important work. Whilst the mechanism or mechanisms (if more than one model is necessary) may be different, funding for this type of accommodation will benefit from the same protection as supported housing in general.

Allowing district Councils to undertake the delivery of this work would, due to the very localised nature of how systems will be implemented, would be more likely to lead to issues being resolved, rather than a general 'one size fits all' arrangement.

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?

In terms of definition, it can be difficult to state an exact timeframe for how long a person may stay in emergency / short-term accommodation as each person has differing needs and circumstances which may affect the length of stay. Whilst there may be a general expectation that users of supported housing would be expected to have moved on within the first 6 month, some cases may take up to 2 years, possibly more. In terms of the definition, it would feel more appropriate to it to be stated that the accommodation is not intended as 'settled' but as a temporary provision, provided as part of the wider plan to help residents move on to more settled accommodation.

Funding for such services could be provided under this model in the same way. Provision of a 'top up' pot which is known over a period of time eg 3yrs, would allow some certainty for providers.