

14 May 2019

Dear Sir/Madam

Re: Consultation on Tackling homelessness together

I am responding to the consultation on behalf of the Cobseo Housing Cluster – a group of forty organisations providing accommodation to former UK Armed Forces personnel.

Several of the questions are directed at LAs and it therefore makes more sense for me to write to you, rather than complete the online form. Our response is divided into the following sections:

- Non-statutory structures
- The role of statutory structures
- Homelessness Reduction Boards
- The duty to refer and co-operate
- Cobseo Housing Cluster's policy pro forma of housing issues

1. Non-statutory structures

An example of a non-statutory structure is the award-winning Cobseo Housing Cluster. The Cobseo Housing Cluster is made up of a wide range of charitable and social housing organisations that provide veteran-specific accommodation. This ranges from specialist hostel and supported housing projects for those with a specific need to family accommodation in assured and assured shorthold tenancies. The Cluster is working to provide more accommodation for the ex-Service community and to bring about an integrated veterans' housing sector with clear pathways for ex-Service personnel in housing need to move into permanent homes.

Our experience shows that non statutory organisations that work together with a shared strategy can bring about positive change and support Veterans. Some examples that other non statutory structures and areas may be interested in adopting include:

The Veterans' Housing Advice Office (VHAO)

Too many ex-Servicemen and women including those transitioning in to civilian life have not known where to turn when they have experienced homelessness and housing problems after leaving the Services. Backed by considerable research evidence, the Cluster developed a proposal for a national telephone and web-based helpline service for those in urgent housing need. We worked together to secure £380,000 of LIBOR funding to set up the initiative which enables any Veteran to seek advice about a housing issue, from homelessness to information about Forces Help to Buy, renting in the private sector or accessing social housing.

The Royal British Legion won the bid to run the initiative in a consortium with Shelter and Connect Assist. When the launch of Veterans' Gateway was announced, we worked closely to integrate the VHAO with the Gateway to maximise access to the support we offer. The helpline is up and running and supporting Veterans every day. We have also produced a 'Wiki' which is the most complete resource on Veterans housing ever produced. We are proud to have delivered such a step change in the way that Veterans are supported to access housing in the country and believe this collaborative initiative will continue to prosper and will hasten thousands of Veterans out of housing need, ensuring they get advice much quicker than they previously would have.

Vacancies dashboard

The Cobseo Housing Cluster has developed a vacancies dashboard_listing all available properties across the country that have been ringfenced for Veterans. This means that at any one time, any Veteran in urgent housing need would be able to access information about available housing in the UK. It also enables housing providers to let their vacant properties more easily.

Ask the question

Part of the Cluster's work is to urge policy changes and we are pleased that H-CLIC returns now include details on Veterans at LA level. This means that Local Authorities must now 'ask the question' to ensure that, when they are approached for housing, they find out whether the person has served in the UK Armed Forces and refer to the Veterans' sector wherever appropriate.

Training

The Cluster has agreed to develop a joint training syllabus for organisations' staff on areas such as safeguarding, welfare reform, housing management and Veterans' mental health. This will ensure that Veterans can expect all organisations to work to the same high quality standards relating to housing. The initiative stems from the initial work of the RAF Benevolent Fund which opened up its training programme on hoarding to other Cobseo members.

New guidance

The Cluster is also proud to have worked in partnership with Shelter's National Homelessness Advice Service to co-produce new guidance to help Local Authorities meet the housing needs of Veterans. The practical guide:

http://nhas.org.uk/docs/Ex_Service_Personnel_Guide.pdf was published in January 2016 and brings together the combined knowledge and experience from the Cluster with Shelter's reputation for preventing homelessness.

New guidance will also be available to LAs later his year.

2. The role of statutory structures

We work with and alongside Local Authorities across the country. Our experience is that there is an inconsistency of approach among LAs.

Research evidence highlights inconsistency for Veterans transitioning from the Armed Forces

Most Veterans transition effectively from the Armed Forces into civilian life. But not all do.

Research from the University of York (*Accommodation for Single Veterans:*Developing Housing and Support Pathways) highlights how some vulnerable former Servicemen and women slip through the net and end up homeless after leaving the Armed Forces. The Veterans who took part in the study experienced a varied quality of advice on transitioning from the Armed Forces and inconsistent support from Local Housing Authorities in the years after leaving service, many of whom didn't identify the specialist support available to Veterans.

The Government has a key role to play to ensure the housing needs of the most vulnerable veterans are properly co-ordinated. In 2018 Stoll, backed by Cobseo, FiMT and Riverside, published a Call to Action which can be accessed here https://s22009.pcdn.co/wp-content/uploads/Call-to-Action.pdf

The need for a Housing Transition Pathway

The creation of a Housing Transition Pathway, modelled on the Career Transition Pathway, would help ensure Veterans' housing needs are met before crisis point is reached. We recognise that the majority of Service personnel will undergo a successful transition. However we call upon the Ministry of Defence to ensure that every single Service leaver, whatever their circumstances, is asked about their housing options after Service. Those identified of being at risk of homelessness should be given bespoke and well-informed advice to ensure they have a pathway away from homelessness upon leaving the Services. This would ensure the Ministry of Defence fulfils its own responsibilities under the Armed Forces Covenant. To this end we recommend that Service Directive 3221 is applied consistently so that every Service Leaver, whatever their circumstances, is asked about housing as part of the transition process. This should be a key commitment in the Veterans' Strategy.

Ensuring LAs consistently ask the question

Not all Local Authorities have been asking people presenting for housing if they have served in the Armed Forces. Unless LAs ask the question, the data on veterans' housing needs will be flawed and incomplete.

Not all Local Authorities are ensuring that if they do identify a Veteran in housing need that they then provide appropriate advice. Data can be really helpful, but it is vital that LAs act on the data and work with the veterans' sector to address Veterans' housing needs. We have too many examples of people who have received poor support from LAs. An example is set out below.

Mandating Local Authorities to ask if people presenting for housing have served in the Armed Forces and, if so to take action to ensure their housing needs are addressed, is vital. Our Call to Action specifically called for:

'The Ministry of Housing, Communities and Local Government to ensure that the H-CLIC form which records homelessness data from Local Authorities asks for data on Veterans. This would mean that every Local Authority proactively identifies Veterans coming through their doors.'

We are very pleased that from December 2018 Local Authorities have started to include Veterans as a distinct category in their housing returns to central government. This is a major step forward and, if the data are analysed effectively, will help us prevent unnecessary homelessness in the future.

It's important that all LAs ask the question and act consistently – measures to help ensure consistency in this area will help reduce homelessness.

Making sure Veterans are part of LAs' housing and homelessness strategies

We need to ensure that Veterans are part of housing and homelessness strategies in Local Authority Housing Departments. This means not only recording whether someone applying for housing advice is a Veteran, but also being able to give the appropriate advice so the Veteran has a clear housing pathway. The statutory guidance issued to Local Authorities on housing allocations in 2012 specifically emphasises the flexibilities authorities have to prioritise applications from ex-service personnel. We believe that this guidance needs to be applied consistently to ensure that every Local Authority identifies Veterans and can advise them appropriately.

The role of City Region Mayors

Veterans' homelessness is not a top priority for every LA and our experience of working with unitary authorities is that they can provide a useful function to support Boroughs to be consistent in identifying Veterans accessing their services and channelling them through to appropriate services. The issue here is lack of consistency of approach to ensure Veterans do not slip through the net.

3. Homelessness Reduction Boards

We support the proposal to establish Homelessness Reduction Boards (HRBs) to ensure that there is strategic oversight to meet the housing needs of local populations. In addition to the points outlined in 3.7, which we support, we would call for:

- The voice of Veterans to be represented appropriately on HRBs for instance via the Armed Forces / military charity sector
- Consistent operating policies for HRBs to avoid a postcode lottery situation of addressing housing need
- The appropriate powers to ensure housing and homelessness strategies are followed and adhered to

We support the proposal for HRBs to take responsibility for housing strategy in their area, subject to appropriate representation on the Boards. We expect the Government would want to pilot the HRB model in a range of different areas first with clear evaluation metrics in place before, if successful, mandating across the country ensuring any lessons from the pilot phase are adopted.

4. Duty to refer and co-operate

Our experience in the Veteran sector shows that LA practice to refer to the Veterans' sector is patchy and inconsistent. The duty to refer, accompanied by useful tools such as the Veterans dashboard, is important. Mandating organisations under a duty to co-operate, whilst respecting specific organisations' purpose and client groups, would send a strong signal to those working in housing and support reductions in homelessness to as close to zero as possible. The Cobseo Housing Cluster may

provide a useful example in this respect. Not only have we established a vacancies dashboard for the sector, but in the wake of the devastating Grenfell fire, the Cluster is currently working on a mutual protocol to ensure that Cluster Members pull together to provide adequate housing should any Member suffer an emergency such as fire, flood or terrorist attack.

5. Cobseo Housing Cluster's policy pro forma of housing issues

Thank you for the opportunity to participate in this consultation. Finally, I refer you to the Cobseo Housing Cluster's policy pro forma of housing issues for Veterans that we believe should be a priority for Government. This can be found here.

Yours faithfully,

Ed Tytherleigh

Chief Executive of Stoll and Co-Chair of Cobseo Housing Cluster