

**Lincolnshire County Council response to the
Funding for Supported Housing – Consultation**

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

Q1: The local top up will be devolved to local authorities. Who should hold the funding; and in two tier area, should the upper tier authority hold the funding?

Lincolnshire has a local authority two-tier system. Lincolnshire County Council (LCC) is the lead commissioner for social care for vulnerable adults and children. LCC also act as lead commissioner for some health provision. A number of vulnerable people will be affected by a housing benefit cap. Devolving the top up funding to LCC will allow best value co-ordination of the top-up grant to minimise impact on vulnerable service users. It would also likely be best value in relation to administration costs reducing the need to negotiate top-ups with multiple district councils. This may also assist diversion of funds to other spend areas and limit overheads charged to the top up fund by second tier authorities.

Disabled Facilities Grant (DFG) funding is already directed to upper tier authorities via the Better Care Fund (BCF), and aids the co-ordination of housing related investment across the 8 Authorities. Top-up funding being co-ordinated by the upper tier authority will further strengthen this leadership and co-ordinating role.

Housing Related Support (HRS) services in Lincolnshire continue to benefit from £4m per year of investment from LCC since the Supporting People ring-fence was removed, with an additional £900,000 invested in supported accommodation services for 16-17 year olds and Care Leavers. The investment demonstrates the continued importance attributed by LCC to this work. This would be an excellent opportunity to be responsible for the effective, localised commissioning of outcomes focussed, value for money support housing services.

Q2: How should the funding model be designed to maximise the opportunities for local agencies to collaborate, encourage planning and commissioning across services boundaries, and ensure that different local commissioning bodies have fair access to funding?

The introduction of a local housing 'commissioning hub' (or hubs) / 'information gateway' would ensure multi-agency collaboration and strategic overview of all planned and existing commissioned provision across Lincolnshire, maximising resources and reducing duplication. Possibly sited / hosted by the 'top-up funding' agency.

This 'hub' would provide a consistent, data collation point providing robust analysis required in order to ensure funding resources are adequately matched to meet current and future supported housing need evidenced across a range of eligible/identified groups. Intelligence gathered will be closely linked to existing housing strategies and towards ensuring clear housing pathways exist in order for all housing options to be maximised for the individual.

The use of the funding should be linked to local strategic aims for health, social care and community safety through, for example, Health and Wellbeing Boards; Corporate Parenting Panel; Transforming Care Partnership; Community Safety Partnership. This would help drive integration of housing support for more vulnerable people with the existing health and care integration systems. It is important the approach to these reforms promotes change in planning and commissioning arrangements, as well as in delivery.

In relation to the ring-fence/mechanism model, any annual settlement will be required to take account of increases in need, inflationary uplifts and avoid the administering of top ups at a time of dwindling resource, but when needs are likely to increase.

Note: The above will need further discussion, both between internal departments and through collaboration with DCs, CCGs, Criminal Justice services, in order to determine the model, who would host, resources etc.

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

To ensure appropriate funding, multi-agency commissioning intelligence, data and financial forecasting is collated and analysed across all client groups.

It is important any overarching funding 'ring fence' requires and supports the need to budget protect or retain a baseline figure for particular groups. Collation of information and data analysis through a local commissioning hub/information gateway model would include:

- How many people are currently in supported housing and what is this likely to be in the future;
- Is current supported housing meeting need now and into the future;
- Who accesses supported housing;
 - Is this model of accommodation best suited to their needs;
 - How long do they stay/what are the throughput/move-on rates;
 - What are the outcomes, i.e. what difference has supported housing made;
 - How is supported housing contributing to other local and national outcomes, for example take up of employment, reduction in access to emergency services.
- Localised and current rent charges and assimilation to LHA, financial forecasting i.e. any shortfall of which would in part equate to the amount of 'top-up' funding required.

The provision of supported housing for vulnerable people should also be viewed in the context of the whole market for available care and support services. For older people, supported extra care housing is an option amongst other services such as residential care. The calculation of the amount needed locally could be linked to the formula for calculating social care allocations through the BCF, whilst ensuring the needs of Young People and Care Leavers are taken into account.

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 provision)?

Yes.

It is important any overarching funding 'ring fence' requires and supports the need to budget protect or retain a baseline figure for particular groups. As local authority and other

statutory health and care funding pressures continue, there is a need to ensure the 'ring-fence' protection does not allow for the dilution or removal of funding for any 'non-statutory' groups, for example the prioritising of statutory/social care needs over non-priority single homeless people and/or those with drug/alcohol issues requiring supported housing. This service provision is often the intervention that prevents some individuals from going on to access more expensive statutory or emergency services.

Any decision making processes in relation to the 'top-up' allocation should include the completion of an equality impact assessment to ensure all identified groups have fair and equal access to supported housing. Having a welfare system where rates are set nationally but a Local Housing Allowance (LHA) applied to supported housing may see some of the most vulnerable at a disadvantage and unable to access good quality supported housing in areas where the LHA is lower and therefore a greater 'top-up' is required.

Supported housing for people with learning disabilities and/or autism is a key towards ensuring individuals have choice and control in their lives. It supports the Transforming Care agenda as it provides an alternative to traditional models of housing such as residential care. It can do this through longer term tailored housing solutions and reassurance of housing stability. Alternatively, it can be a stepping stone to other forms of independent housing by enabling individuals to have increased confidence, social and living skills, but continues to be an option and safety net at times when greater support is needed towards achieving longer term sustainability.

Similarly, supported accommodation for 16-17 year olds and Care Leavers is an essential part of the County's Corporate Parenting role for (Looked After) Children and Young People. It supports them to avoid homelessness at times of family breakdown or when leaving care and helps them to maintain education and training opportunities, leading to a readiness for adult life and move-on to employment and independent living.

There should be funding protection in relation to fair access and local connection. Those who have experienced transient accommodation history outside of local boundaries due to, for example, experiencing domestic abuse, or being looked after children or care leavers, should not have access restricted linked to uncertainties around funding responsibilities or could be left street homeless whilst reconnection is sorted. Equally, local housing policies, including local connection, must be able to support move-on, where appropriate, to ensure continued individual progression towards independence through other housing options.

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

Q5: What expectations should there be for local roles and responsibilities? What planning, commissioning and partnership and monitoring arrangements might be necessary, both locally and nationally?

In the case of two tier authorities such as Lincolnshire, the existence of a housing strategy or strategies as a key document for and agreed by all interested stakeholders, including District Councils, CCG's, Social Care, the Justice System and service user delivery boards. The strategy will include working protocols between agencies and make clear all housing pathways and access arrangements for both professionals and service users and carers.

The introduction of a local housing 'commissioning hub'/'information gateway' to underpin a multi-agency collaborative approach and strategic overview of all planned and existing commissioned provision across Lincolnshire, maximising resources and reducing duplication.

This 'hub' would provide a consistent, data collation point providing robust analysis required in order to ensure funding resources are adequately matched to meet current and future supported housing need, evidenced across a range of eligible/identified groups.

Multi-agency monitoring information and commissioning intelligence, data and financial forecasting is collated and analysed across all client groups. Collation of information and data analysis through a local commissioning hub/information gateway model would include:

- How many people are currently in supported housing and what is this likely to be in the future;
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 - What are the outcomes, i.e. what difference has supported housing made;
 - How is supported housing contributing to other local and national outcomes, for example take up of employment, reduction in access to emergency services.
- Localised and current rent charges and assimilation to LHA, financial forecasting i.e. any shortfall of which would in part equate to the amount of 'top-up' funding required.

This local information and monitoring intelligence should feed into a national data set in order to evidence performance nationally, ensuring fair and equal access to supported housing, localised trends and early indications of progress or shortfall of funding issues.

An existing mechanism for planning and commissioning co-ordination should be specified as having a lead role. A number of solutions are available, including Health and Wellbeing Boards, the Better Care Fund partnerships that already have the lead for Disabled Facility Grant funds and the Youth Housing Strategy Delivery Board. This will further ensure a joined up approach and that housing need is integral to all local plans.

There will need to be close monitoring of expenditure to ensure the top up fund is not exhausted part way through a year and providers no longer receive payments. At present, the district councils can continue to spend and reclaim the money back from Government.

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

As the potential 'host' for any 'top-up' funding arrangements, collation of intelligence data and evidence of need, the successful delivery model required to introduce and administer these changes will create additional resource implications and therefore additional funding pressures. Individual agency and District Council processes would require the establishment of a multi-agency mechanism underpinned by appropriate IT function, particularly where integration of existing IT systems is not possible due to incompatible technology.

There would need to be a project plan and timetable in line with the Government's implementation date, with sufficient time to allow any procurement exercises, for example IT systems.

It is difficult to be more precise at this time until we know the full details of the funding allocation mechanism and the information/evidence required by Government in order to access appropriate funds. Clarity on national frameworks and the actual financial effect of these in each administrative area is essential as early as possible in the programme of implementation. However, some of the following will be required to be undertaken:

- Replication and/or improvement of existing mechanisms for planning supported housing development;
- Establish which organisations already receive funding, what this is for, how much and potential impact going forward; monitoring of exit strategies;
- Consider support required to service users;
- Manage applications for funding and decisions about funding awards;
- Make payments to providers;
- Monitoring arrangements to ensure required outcomes are being achieved;
- Ensuring acceptable services are being provided;
- Maximising value for money.

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

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?

As described in previous answers, the introduction of a local housing 'commissioning hub' or hubs/'information gateway' that co-ordinates and collates all supported housing activity, looking to maximise resources and reduce duplication will provide assurance of appropriate and quality provision. Multi-agency commissioning functions carried out in terms of evaluation of current provision, consultation and involvement of those who use services will ensure provision remains of good quality and continues to meet local need. Lincolnshire County Council is an outcomes focused authority that requires services to make a real difference to people's lives.

In its simplest form, this multi-agency fund requires a multi-agency planning and commissioning mechanism to provide it with the right level of oversight. Current and available mechanisms exist such as the Health and Wellbeing Board, local Better Care Fund partnership or Youth Housing Strategy Delivery Board, with both having local democratic accountability through the upper tier local authorities' scrutiny processes.

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 supply

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?

We recognise supported housing is an important provision that provides a tailored package of support towards maintaining and sustaining health and wellbeing for those 'at risk' and/or vulnerable individuals. Supported housing can be more expensive to provide. Individuals with complex or multiple needs require skilled and knowledgeable staff often with intensive periods of support and sometimes on a one to one basis. Housing management costs are, therefore, higher than general needs housing. Any funding model needs to take into account the costs involved in the delivery of good quality supported housing.

To support personalised and outcomes focussed services, the establishment of a clear and transparent local pricing framework and funding tool would help provide certainty to providers. This would help with business planning and future forecasting. Equally a local and strategic housing strategy will help providers to know and understand current and future demand.

A pricing framework/funding tool could be, for example and in simple terms, services are commissioned depending on the individual's assessed 'band of need'. This 'band of need' is aligned with the level of intervention an individual requires, which in turn relates to a price range. There would need to be incentives for progress and move-on where appropriate to ensure individuals do not necessarily remain in supported housing beyond its usefulness.

Service providers would need to have in place 'open book accounting' systems that can clearly evidence where funding is being spent, and be able to evidence the difference a service is making to individuals' lives.

The setting of a commissioning framework or market position statement, based on a set of firm financial allocations over time will ensure the appropriate strategic and financial clarity for providers to have confidence. It will also assure appropriate context is set with other key programmes of work.

There will need to be close monitoring of expenditure to ensure the top up fund is not exhausted part way through a year and providers no longer receive payments. At present, the district councils can continue to spend and reclaim the money back from Government.

If the entire budget is allocated up-front there will be no money for new services, unlike now where new services can apply for the intensive housing management support through Housing Benefit (HB) and will always be paid. There also needs to be some consideration in relation to aspects not covered by HB i.e. ineligible such as communal service charges.

Some developers only build the accommodation, with a different organisation leasing the accommodation and providing the service. The developer needs confidence they will get a service provider, with the service provider needing the assurance that "supported accommodation" funding will be provided. They will probably need the assurance at planning stage and not when the building is complete.

Most providers won't want the risk of not having guaranteed funding. Funding, therefore, needs to be in advanced block payments and over an agreed term or providers could

move away from providing supported accommodation.

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?

Yes.

Having national expectations would ensure the 'ring fence' protection does not allow for the dilution, removal or diversion of funding elsewhere. A national statement of expectations should help to prevent a 'postcode lottery' of different arrangements in different areas and should be evidence-based on what works and existing good practice e.g. St. Basil's Positive Pathway.

Local information and monitoring intelligence should feed into a national data set in order to evidence performance nationally, ensuring fair and equal access to support housing, localised trends and early indications of progress or shortfall/funding issues.

How this would work and the assurance that it would be followed can be found in answers 2, 3, 5 and 7.

Q10: The Government wants a smooth transition to the new funding arrangement on 1st April 2019. What transitional arrangements might be helpful in supporting the transition to the new regime?

It would be helpful to have 'pilot areas' to undertake early adoption in order to identify and resolve any implementation issues, unintended consequences and lessons learnt to share with government and other areas. Transition funding would be required to ensure success and progress.

A local delivery model needs to be established and agreed as soon as possible with partners and stakeholder groups, following further guidance from Government as to the exact funding mechanism. Mapping of existing administrative and commissioning arrangements across Lincolnshire, project design and implementation plans should be initiated as soon as possible to enable key decisions to be made in relation to lead roles and fund 'hosting' arrangements.

Clarity on national frameworks and the actual financial effect of these in each administrative area is essential as early as possible in the programme of implementation. This will enable commissioners to try and align the new funding arrangements to existing commissioning plans.

Current services that didn't meet the new specification once set by Lincolnshire would need to be informed as early as possible to enable exit strategies to be drawn up and TUPE negotiations to begin. If the service was able to adapt to meet the new specification, transitional protection might be needed for a period of time.

If a scheme were to no longer receive funding, they would be at risk of closure which at worst could result in homelessness. Tenants might need to be assisted to move to alternative accommodation if they still required support, or the rents were no longer affordable. Some tenants might need to start contributing towards the rent and require support to do so. Rent arrears would likely increase.

If providers are concerned they won't receive funding from 2019 they could soon start considering closing services.

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?

Involvement and co-production with current service users and their families and carers is essential to success. The suggested funding model toolkit/framework described in the answer to Q8 should ensure service users are clear about the type of support they can expect, how this will meet outcomes and the cost in order to be able to make informed housing choices.

It is important that the provision of 'floating support' is recognised within the funding model. Someone, for example, through choice and control wishes to live in 'general needs' accommodation but requires floating 'housing support' in order to sustain their accommodation and maximise independence (and avoiding potentially more expensive options) should still have a funding 'top-up' applied.

Any funding model needs to be simple and transparent for all those with an interest in supported housing. Commissioners want to be sure through open book accounting they are getting value for money alongside quality provision, that makes a difference to people's lives and helps them to progress towards independence. Providers and developers want to be assured the costs of providing supported housing are fully understood by commissioners and that any funding is fair and sufficient to develop and sustain supported housing into the future. Equally, projects commissioned and provided by local authorities directly should be supported through the funding model to acknowledge the additional costs of supported accommodation services.

The local top-up model should enable housing providers to provide accommodation for people who get housing benefit as well as those not receiving housing benefit. This is particularly important for Extra Care Housing providers whose schemes are often made up of a mix of housing benefit claimants and those who fund their own care and accommodation – both groups would be charged the same level of rent. There may be a danger of providers needing to set up a two-tier cost structure to pay for the cost of the accommodation.

Local Housing Allowance amounts vary across each of the 7 districts in Lincolnshire, for example there is a £13 per week difference for one bedroom in one District compared to another. Top ups across districts may need to vary to avoid providers only providing accommodation in the higher paying areas. In areas where the LHA is low, the gap between the rent/service charges and the LHA may be too much for tenants to make up, resulting in evictions or clients on low incomes being declined accommodation.

Living in supported accommodation can be a barrier to obtaining employment because the rents are too high for working people. This needs to be overcome to enable service users to obtain employment and not have to leave the accommodation because it's no longer affordable. Some funds might need to be ring fenced to enable this to happen.

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

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?

It is important people do not go into supported housing 'emergency' or 'short term' as a matter of course, when they could receive appropriate support within longer term housing solutions.

Emergency and Short Term could be defined as supported accommodation intended to provide shelter for a minimal term with minimal security of tenure i.e. licensee.

Emergency

Immediate access to accommodation and support - without the intervention of supported housing their safety, health and wellbeing is likely to deteriorate or they will be 'at risk' of serious harm or will require access to other emergency 'blue light' service provision. This provision is an intense 48 hour/7 day service to enable settlement/adjustment and assessment of need/multi agency collaboration solutions. Move-on options include 'short-term' supported accommodation, longer term support or general needs accommodation. This should not necessarily see the individual having to physically move, but a change to the 'band of need'.

Short Term

A definition of short term can vary widely according to the group/s identified within this consultation. It is distinctive from Extra Care and Community Supported Living Schemes which provide longer term housing solutions for as long as someone chooses to live there.

Robust support planning alongside person-centred outcomes would determine the length of stay. Arguably, once 'short term' outcomes identified have been met then there should be move-on planning away from provision. Incentives may need to be included to ensure progression and throughput, supporting transition into other forms of alternative/appropriate accommodation. This could be incentivised using payment by results methods.

General

Services must receive the housing element direct in order to remain financially viable. Providers can't operate and employ staff if they aren't guaranteed the funding to pay the wages etc. Where someone moves into supported accommodation there should not be any delays in benefit claims being re-assessed.

Providers cannot wait 6 weeks for a claim to be assessed, or payments made direct to the client, because this would result in rent arrears in many cases and providers not having the finances to continue the service. Short term accommodation providers need to be protected in order to be financially viable.