Kerslake Commission evidence submission

Glass Door Homeless Charity

1. Thinking about the response to rough sleeping during the pandemic, which measures, policies, practices or joint working do you think worked well and why?

• Removal of local connection requirement: Glass Door has an open-door policy and makes no distinctions in terms of eligibility. This helps us support people who fall through the cracks elsewhere. Likewise, when 'Everyone In' removed the local connection requirement, it became possible for local authorities to ensure appropriate accommodation for rough sleepers for whom they were not usually responsible, allowing many people to access support for the first time.

• Flexibility with rough sleeping verification: By allowing members of outreach team to visit day centres to 'verify' people rather than requiring them to be verified sleeping rough at night allowed many people access to support who otherwise would be difficult to verify. Many rough sleepers move around from night to night for safety reasons, making verification a challenge.

• Providing shelter at the point of need: The ability to provide shelter rapidly, before checking entitlements and local connection, made it possible for many who were wary of support providers to engage and build trust. We suggest this should continue in future and checks made only once basic health, safety and other needs are being met.

• Joint working: During the initial stages of Everyone In, we saw a substantial increase in joint working between local authorities and charities, between charities with other charities (e.g. regular forums / updates), and between the Greater London Authority (GLA) and local authorities. Some of the forums and joint working have now stopped, and Glass Door supports their being reinstated.

2. In contrast, which measures, policies, practices or joint working do you think have not worked well and why?

• Patchwork provision and lack of legal clarity: Once the initial 'Everyone In' directive lapsed, patchwork provision with varying responses and opportunities between different boroughs led to inconsistent responses. The lack of legal clarity led some boroughs to stop providing accommodation to those without a clear local connection or to certain non-UK nationals with NRPF, causing distrust, frustration and destitution among many people who

became newly homeless and those who never made it into the 'Everyone In' scheme.

• Lack of face-to-face services for digitally-excluded individuals: Communication with some local authority housing departments has been very challenging with complete reliance on phone/email. Staff have been consistently slow to respond or hard to contact, leading to long delays in moving people on from emergency accommodation. Alternative arrangements or safety measures need developing to accommodate those who have no or little access to smart phones and computers.

• Delay in issuing shelter guidance: Ministry of Housing, Communities and Local Government (MHCLG) did not issue guidance on the provision of night shelters until 13 October 2020. With Glass Door and many other shelters normally opening in early November, we were left with very little time to adapt. Organisations providing shelter and other services for guests need sufficient notice – at least four months - in order to prepare services to ensure they provide safe environments for guests, staff and volunteers.

• Prohibition of shelters with shared airspace: Due to the restrictions set out in the MHCLG shelter guidance, traditional providers of emergency shelter either could not operate or could do so only at greatly reduced capacity. In the winter before Covid we were able to accommodate 829 guests. During the winter of 2020 to 19 April, we have only able to offer accommodation to 194 guests, with many more people looking for safe accommodation than we were able to accommodate.

3. Please describe the specific challenges, and opportunities, in the next phase of the Everyone In programme and helping people to move on from hotel accommodation.

• Those with NRPF or pre-settled status have few options beyond reconnection and work. Finding work during the pandemic was incredibly challenging and time is running out. Likewise, many have no "home" to return to, and reconnection is seen as dangerous or leading to greater destitution for many.

• The lack of decent and appropriate accommodation is a key issue. Many of our guests do not want to take private rental sector (PRS) accommodation because it is small, badly maintained and far away. Appropriate accommodation options are needed for people who are working, especially if their work is precarious/variable hours/part-time, which means they would

need to pay rent from a mix of wages and benefits. Most PRS schemes are only set up for people who are wholly on benefits.

• The benefit cap is a barrier. Housing costs in London take such a large portion of allowed benefits, there isn't enough left over for other necessities. Those on benefits are faced with impossible choices between paying rent, eating and heat, for example. It's failure to adequately cover costs pushes people into rent arrears and vulnerable to eviction. Alternatively, potential renters are forced to move away from existing support networks, leaving them isolated. Furthermore, the cap blocks many from taking advantage of an increase in Universal Credit and the Local Housing allowance. Those on housing allowance can only rent outside London, acting as a disincentive for some to move on from our hostel service.

• Some people can't move on as quickly as we would like, as they were not deemed to be destitute while staying in a hostel/hotel. In one case, a Local Authority said they would not consider our guest at risk of homelessness while they were in our hostel and it was more than 56 days before our closing date. Some guests who were ready to apply for accommodation through the National Asylum Support Service were also not able to make the application until our hostel was close to closing as they were not viewed as 'destitute' while they were in our hostel. (This would not be the case in a shelter model.) This in turn has the effect of keeping people in our single-room accommodation project longer, reducing availability for others in need.

4. And finally, what do you think needs to be put in place to embed the good work that developed during the pandemic, or improve upon it?

• Services that take people straight off the streets and work with their situation from there (like a longer-term No Second Night Out) should be developed. Likewise, solutions that embed a Pan-London approach that provide a consistent service across the capital, then links people into their appropriate local connection at a later point, should become the default.

• Local authorities need clear direction on how they can support people with no recourse to public funds – ideally, both legally allowing and funding them to provide accommodation as a human right. If that is not possible for ideological or political reasons, then government should not stand in the way of those who can provide solutions (such as charities and faith-based groups) to run communal sleeping spaces and other emergency

accommodation that meets public health requirements to ensure the health and safety of guests, staff and volunteers and is free at point of access.

• Long-term solutions that involve affordable housing and welfare reforms will be needed to end homelessness, and short-term solutions will be needed to prevent a massive influx in rough sleeping when rent protection measures and the furlough scheme ends.

• We prefer the government to recognise a responsibility to support all rough sleepers, but if they do not, non-governmental organisations (like Glass Door with its open-door policy) will step in to provide emergency shelter for those who fall through the cracks.

• A modified shelter model can offer the short-term solution, especially for those who cannot find support elsewhere. Glass Door is working with health and homelessness experts to put together safe, viable accommodation options. Communal sleeping spaces adapted with Covid-19 secure measures can provide safe options for people who would otherwise be sleeping rough in winter. We welcome the opportunity to work with MHCLG and others to develop flexible guidance that can allow shelters to safely reopen to support those who would otherwise be sleeping rough.

• The shelter model, with free space provided by churches, would allow for a greater number of people to find support than a model that relies on single-rooms. Our data shows that with wrap-around support, shelters can be effective, safe, humane forms of accommodation that can act as a springboard out of homelessness. We believe a mixed model that provides safe environments and allows people to move from shelter to hostels to independence, all buttressed with crucial support from trained support workers, would be the right combination moving forward.