The
Kerslake Commission
on Homelessness and
Rough Sleeping

Appendix: Full RAG rating listed by constituency

**Progress report
September 2022**

Area	Recommendation	Lead actor(s)	RAG rating
Strategy, Policy and Delivery	The new Inter-Ministerial Group on rough sleeping, led by the Department for Levelling Up, Housing and Communities (DLUHC), should set out the overarching vision of the Government, publishing a cross-Government national strategy with clear expectations and strategic engagement with key agencies, and an explicit focus on prevention. The strategy should be accompanied by a published annual review of performance, no later than three months after the annual count. This annual performance review should be carried out by DLUHC, working with regional and local government, and be used to analyse national trends and identify gaps in provision and strategy. A key responsibility for the Inter-Ministerial group in its terms of reference must be to push for cross government investment, to enable delivery of the strategy.	DLUHC	Green 🟢
Strategy, Policy and Delivery	A joint Health and Homelessness Unit, akin to the Joint Health and Work Unit, should be established to ensure that cross-departmental working is carried through at a civil service level. The unit should have joint priorities and shared data to support the removal of barriers to effective working.	DLUHC / DHSC	Red 🔴
Strategy, Policy and Delivery	The Government should extend the Homelessness Reduction Act's Duty to Refer, to a Duty to Collaborate with relevant public agencies to both prevent and respond to homelessness. This should include the Department for Health and Care (DHSC), the NHS and Public Health England, Department of Work and Pensions and its agencies; the Home Office, and Ministry of Justice and its agencies and other government agencies with an involvement in homelessness and rough sleeping services. An example of this would be the sharing of data within Caldicott Principles.	DLUHC	Amber 🟡

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Strategy, Policy and Delivery	The Government should commission tripartite reviews of performance in homelessness services, including prevention and long term provision and support. Driving this system requires joined up performance management involving (1) local authorities, (2) local delivery partners, and (3) cross Governmental departments and bodies, namely DLUHC, DHSC, the NHS and the Office for Health Improvement and Disparities. The aim should be to find what has and has not worked for partner agencies, where there are issues of resourcing, and support improvement using examples of good practice. This should build on the successful DLUHC advisers model and be supplemented by direct offers of support, including the option of peer review. The Local Government Association has a role in supporting the development of good practice.	DLUHC	Amber-Red 🟠🔴
Strategy, Policy and Delivery	There should be a national review of how an individual's needs, strengths and aspirations are assessed and what data is collected. This should use an outcomes-based approach, and work with people with experience of homelessness, providers, and commissioners. This will ensure assessments and data collection have a clear purpose. This will be crucial in helping identify what action, support and resources are required to end rough sleeping, and enable successful outcomes to be measured by genuinely useful data.	DLUHC	Green 🟢
Strategy, Policy and Delivery	There should be a cross-departmental focus on homelessness prevention. By investing in preventative measures – such as arrears/debt recovery, employment support, training on budgeting and knowledge of tenancy rights and responsibilities – the resilience of families and individuals will improve. This should be supported by a similar approach to early mental health support which would further underpin a prevention culture and would result in fewer households in crisis.	DHSC DWP MoJ DLUHC Home Office	Green 🟢
Roles of accommodation and service models	The Department of Work and Pensions should allow people living in supported housing to experience the positive effects of work without putting their benefits at risk, by re-introducing a 'work allowance' for people living in this type of accommodation.	DWP	Red-Amber 🔴🟠

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Roles of accommodation and service models	The Government should introduce a quality assurance framework for homelessness accommodation, with a national register that requires evidence that providers are meeting minimum standards set by the framework as a condition of registration. This is to ensure that accommodation is safe, decent and appropriate, and creates a better definition of the standard of care, support and supervision required. The work to regulate must be supported by funding for local authority teams to enforce homelessness standards.	DLUHC	Green 🟢
Roles of accommodation and service models	In its vision for scaling up Housing First provision for people with complex needs, Government must drive cross-departmental collaboration and should establish a joint ministerial funding stream, as well as cementing a shared understanding of what Housing First is in practice.	DHSC DWP MoJ DLUHC	Red 🔴
Roles of accommodation and service models	The StreetLink system should be recommissioned at a national level.	DLUHC Homeless Link	Red 🔴
Roles of accommodation and service models	The Government should commit the funds from the Right to Buy scheme to a strategic acquisition programme to deliver more social rented homes, and reforms to be introduced through the upcoming Planning Bill should provide local authorities with financing flexibilities to build more housing of this type.	DLUHC	Red 🔴
Roles of accommodation and service models	To end the use of 'no fault' evictions, which is the leading cause of statutory homelessness, the Government should urgently bring forward the Renters Reform Bill to repeal Section 21 of the Housing Act 1988. These reforms should also increase notice periods from two months in all but the most serious cases.	DLUHC	Green 🟢

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Preventing inequalities and unfairness	The Government must establish a clear policy position that limiting access to benefits for non-UK nationals should stop short of causing destitution. Destitution can be prevented through investing in good quality independent immigration and welfare advice, and employment support; clear guidance on access to benefits for non-UK nationals whose status is yet to be determined; and simpler and faster processes to clarify people's immigration status. Local authorities should be provided with guidance on what it means to 'exhaust all options within the law' to support those sleeping rough and who are not eligible for statutory homelessness assistance, due to their immigration status. Local authorities should be provided with financial compensation where all other options have been exhausted to prevent destitution. Further, local authorities with a high number of non-UK nationals with unclear immigration status on the streets should look to funding immigration advice as part of their rough sleeping and homelessness prevention services. Collecting data on the number of individuals with no or limited access to public funds experiencing destitution, will help identify what resources are needed to assist this group out of homelessness.	DLUHC Home Office	Red-Amber 🔴 🟡
Preventing inequalities and unfairness	The Government should commission research on groups experiencing homelessness with further lenses of disadvantage, for example women, LGBTQ+ people, people who are BAME and those experiencing youth homelessness. This can be used to develop better designed data collection methodologies for these groups, who have different experiences of homelessness and are more likely to be hidden homeless.	DLUHC Government Equalities Office	Amber 🟡
Preventing inequalities and unfairness	The police can have a positive role in supporting people's recovery from sleeping on the streets, which the Government can support by expanding at a national level the Community Service Treatment Programme, as recommended in the Dame Carol Black Review.	MoJ DHSC Home Office	Red 🔴

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Preventing inequalities and unfairness	The Government should review the new Immigration Rules which include rough sleeping as a grounds for deportation and work with the homelessness sector to deliver more positive and effective alternatives.	Home Office	Red 🔴
Preventing inequalities and unfairness	The Government should commit to the Vagrancy Act (Repeal) Bill, which seeks to repeal the Vagrancy Act and replaces it with assertive, persistent and trauma informed outreach, matched with offers of housing and ongoing support. The Government should also clarify aspects of the Anti-social Behaviour, Crime and Policing Act 2014, setting out 'enforcement principles' that provide safeguards, to ensure that people who simply need help are not criminalised.	DLUHC Home Office	Green 🟢
Preventing inequalities and unfairness	To make sure that people are not released from prison or hospital into homelessness, the Government's rough sleeping strategy must introduce governance around transition points, to ensure planned and timely release, with community support and prior connections established. The Government must also end unplanned Friday releases from prison, to ensure people have adequate time to access vital services before they close for the weekend.	DHSC DWP MoJ DLUHC Home Office	Green 🟢
Spending	To prevent an increased flow of people onto the streets, the Government must retain the welfare changes that have kept people afloat during the pandemic, whereby Local Housing Allowance rates were raised to the 30th percentile of local rents and Universal Credit was increased to £20 a week. In addition, the Government should review the benefit cap and seek to increase it in areas with high affordability pressure, and provide a financial package of support for people in arrears due to the pandemic.	Treasury DWP DLUHC	Red 🔴
Spending	To deliver the sector recommended target of building 90,000 social rented homes a year, the Government must increase grant funding delivered through the Affordable Homes Programme. The Government should increase the supply of supported housing through the continuation of the Affordable Homes Programme, but ensure capital funding is linked to multi-year revenue funding for support services.	Treasury DLUHC	Red 🔴

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Spending	Everyone In should continue to be financed through the Rough Sleeping Initiative (RSI), delivered through a minimum three year funding settlement and with an annual spend of £335.5m. The RSI spend should have a focus on rough sleeping prevention, outreach, accommodation and support, and should pay for an increased supply of self-contained, good quality emergency accommodation, with tailored options for women and young people.	Treasury DLUHC	Green
Spending	The Rough Sleeping Accommodation Programme should be continued for the duration of the Rough Sleeping Initiative. The viability of this model can be improved, and take up increased, by aligning capital and revenue funding, allowing capital funding to roll over into subsequent years and drawing on continuous market engagement approaches. Strategic partnership working should be built into the programme and there should be flexibility to increase the maximum length of stay beyond two years.	Treasury DLUHC	Red
Spending	The Department of Health and Social Care (DHSC) should reverse the disinvestment in drug treatment and wider recovery services, increasing funding by up to £552 million annually over the next five years, on top of the baseline annual expenditure from the public health grant, as recommended in the Dame Carol Black Review.	Treasury DHSC	Green
Strategy, Policy and Delivery	To prevent homelessness, and respond to it quickly where it does occur, local authorities should be expected to produce long term, integrated homelessness and health strategies, and rapid rehousing plans. This work should require a local assessment of need, conducted using local homelessness partnerships and based on a standardised methodology set by DLUHC. This assessment of need would aim to quantify the level of central government funding needed to ensure the most appropriate accommodation is available for the individual, and there are sustainable long term recovery options, with wraparound support where needed.	Local Authorities LGA	Amber

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Strategy, Policy and Delivery	To encourage partnership working, local authorities and integrated care systems should put in place joint processes for commissioning services. This should include exploring longer contracts to give time to build practice and a culture of integrated working, where needed, whilst maintaining the ability to test and pilot initiatives to respond to changing circumstances. This must be supported through longer-term funding settlements.	Local Authorities LGA ICSs	Red-Amber 🔴🟡
Strategy, Policy and Delivery	To ensure that an appropriate offer of support is always available, local authorities should make greater use of pan-regional commissioning of specialised services.	Local Authorities LGA	Amber 🟡
Strategy, Policy and Delivery	Improving consistency and comparability of datasets will improve integrated working between local authorities and their delivery partners. Local authorities should collaborate with their partners, to maximise the potential of what data is collected and how it is then used.	Local Authorities LGA	Amber 🟡
Roles of accommodation and service models	Local authorities should remove verification as a necessary step for accessing services, and instead incorporate it as part of the assessment process, in order to determine the appropriate offer of support and pathway.	Local Authorities LGA	Amber-Red 🟡🔴
Roles of accommodation and service models	To maximise resources, capacity and expertise in outreach services, local authorities should either embed specialist workers – such as drug and alcohol and mental health workers – in generic outreach teams; and/or develop specific accreditation for outreach workers who might specialise in particular areas. This should include working with the new integrated care systems to commission and coordinate effective specialist services, which are embedded into outreach teams. This may require additional and designated resourcing from public health grants.	Local Authorities LGA	Amber 🟡

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Roles of accommodation and service models	Local authorities, in partnership with homelessness organisations, should conduct long term, strategic planning for peaks in weather, including extreme cold or severe heat, and other contingencies. This strategy should be grounded in prevention, to ensure that people supported through severe weather emergency protocol (SWEP) are kept to a minimum, and supported through long-term funding. The aim should be to reduce reliance on communal night shelters.	Local Authorities LGA Homelessness service providers	Amber-Green 🟡🟢
Roles of accommodation and service models	Local authorities must ensure that all commissioning, services and support – from health, to housing, to benefits advice – are person centred, trauma informed and psychologically informed, where the individual is supported to make their own choices and supported to identify what is important to them.	Local Authorities LGA	Amber 🟡
Preventing inequalities and unfairness	LGBTQ+ young people face unique experiences of domestic abuse, familial abuse, homophobic, biphobic and transphobic harassment, and mental and physical harm, which is further compounded among BAME, trans and disabled LGBTQ+ young people. Local authorities must consider these vulnerabilities when establishing priority need and determining intentional homelessness.	Local Authorities LGA	Amber 🟡
Preventing inequalities and unfairness	To improve access, experience and outcomes, among people with complex needs, local authorities should work with all services and agencies, including but not limited to homelessness, housing, healthcare, welfare and criminal justice to develop further training to enhance their understanding of complex needs, with a focus on gender, as well as LGBTQ+ and BAME experiences.	Local Authorities LGA Relevant service providers e.g. housing, healthcare, welfare and criminal justice	Red 🔴

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Strategy, Policy and Delivery	Homelessness organisations are at the coal face of homelessness and rough sleeping, and should feed this wealth of experience into strategies and solutions developed by central and local government. They should also ensure that people using their services are supported to inform solutions through their wealth of lived experience.	Homelessness service providers	Green 🟢
Roles of accommodation and service models	Staff in the homelessness sector support very vulnerable people, often with complex needs, and it is essential that they have the right skills and experience to do this job. To recognise the challenging job that they do, it is recommended that Homeless Link convene a consultation on professional accreditation. This should cover all areas of the workforce and include understanding the integration of specialist support, such as mental health and immigration advice.	Homeless Link	Green 🟢
Roles of accommodation and service models	Homeless service providers, charities and agencies have a responsibility to make sure that any accommodation model is safe and Covid secure using the following principles: a. Operated from buildings that can be made Covid secure, for example can be well ventilated and are able to test temperature on entry. b. If communal spaces, are part of an established pathway that allows for people to be given self-contained emergency accommodation if they need to isolate or test Covid positive. c. If providing a shelter or communal space, the accommodation must have in place a testing regime where people are tested on entry and then are regularly tested when in the building. d. Have a continuity plan that allows for managing an outbreak and decanting the space. The Kerslake Commission on Homelessness and Rough Sleeping e. Where shelters are not reopening, ways of harnessing the community response to homelessness and other forms of disadvantage should be considered; these range from floating support to large-scale food provision to smaller contributions. f. Regardless of shelter models, space to store possessions and access to showers should be provided where possible.	Homelessness service providers	Amber 🟠

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Preventing inequalities and unfairness	To create more inclusive environments, homelessness organisations should commission training programmes for staff to raise awareness of the needs and experiences of LGBTQ+ people and women who are homeless or at risk of homelessness. who are homeless or at risk of homelessness. This should include a focus on further marginalised groups such as BAME, trans and disabled LGBTQ+ people.	Homelessness service providers	Red 🔴
Preventing inequalities and unfairness	Non-UK nationals and BAME groups often face inequalities in the service that they receive from homelessness organisations. To help address this, race and nationality should be used as feedback points for monitoring service outcomes, ensuring that the questions asked and the way data is reviewed involves input from BAME led organisations.	Homelessness service providers	Red 🔴
Preventing inequalities and unfairness	To allow for accurate targeting or resources, homelessness organisations should routinely collect Covid-19 and flu vaccination data amongst people experiencing homelessness, including clinical vulnerabilities, demography, locality, and a breakdown of reasons for low vaccine confidence. The purpose of this is to address vaccine hesitancy, including where and how support organisations should target resources.	Homelessness service providers	Amber 🟡
Better strategy, policy and delivery	Housing associations are not public bodies, and therefore do not have a legal duty to address homelessness. However, housing associations do have a social responsibility, and an important role to play in the provision of secure and safe accommodation, and support for people who are homeless or at risk of homelessness. The Commission recommends that the National Housing Federation, working with Homes for Cathy, continues to promote the positive work done by housing associations and drives forward this commitment to collaborate with their members to prevent and relieve homelessness. The Commission also recommends that the LGA continues to promote the benefits of local authorities and housing associations working together to develop solutions and longer-term strategies. To incentivise housing associations to prevent and contribute to homelessness solutions, the Regulator of Social Housing should monitor performance in this area.	National Housing Federation Homes for Cathy LGA Regulator for Social Housing	Amber-Green 🟡 🟢

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Roles of accommodation and service models	To encourage lettings for people with experience of homelessness, social housing providers should operate flexible allocations and eligibility policies which allow individual applicants' unique set of circumstances and housing history to be considered. This can be embedded through allocations guidance issued by Government.	Social housing providers DLUHC	Amber 🟡
Preventing inequalities and unfairness	There are innovative ways that housing associations can respond to the housing and support needs of people with No Recourse Public Funds, or whose status is still to be settled, that are outside of normal business but often part of their charitable objectives. The Commission is encouraging housing associations to: a. Offer peppercorn rent schemes within their existing properties; b. Provide working accommodation for people with NRPF currently working or looking for work c. Offer accommodation with legal advice to people with NRPF who may have a chance of a change in status d. Provide free hostel and refuge spaces.	Housing associations	Red-Amber 🔴🟡
Strategy, Policy and Delivery	The forthcoming integrated care systems in England will play a crucial role in embedding health within local delivery agencies. Guidance for the integrated care systems should stipulate that Integrated Care Boards, Integrated Care Partnerships and Health and Wellbeing Boards have a dedicated focus on tackling health inequalities for inclusion health populations, including people experiencing homelessness and rough sleeping, and ensure that both mainstream and inclusion health services deliver trauma informed and psychologically informed services for this cohort, who may struggle to engage. This focus must also be shared by the new Office on Health Promotion. There should be an assessment of need and capacity within inclusion health services, to ensure that people are able to access care and support. As part of the Care Quality Commission's (CQC) system review framework, there should be a specific focus on whether integrated care systems explicitly reference homelessness and rough sleeping as part of their health inequality strategy. This should be used as a litmus test for the quality of integrated care systems' population health plans.	Integrated Care Boards, Integrated Care Partnerships and Health and Wellbeing Boards NHS England Care Quality Commission's (CQC)	Amber-Green 🟡🟢

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Strategy, Policy and Delivery	The existing specialist rough sleeping programme within NHS England and Improvement should continue to be delivered. The wider Long Term Plan mental health transformation must be inclusive of people experiencing rough sleeping and homelessness in line with the NHS Mental Health Implementation Plan. This should have a continued focus on reducing barriers to access and quality of care. Future expansion of existing programmes should be funded beyond the Long Term Plan so that services can reach people in every part of the country.	NHS England	Green
Strategy, Policy and Delivery	To effectively meet people's heath and housing needs, there must be robust and effective cross sector data sharing. NHS England should put support and guidance in place to enable local systems to share data successfully, including vaccination uptake amongst people experiencing rough sleeping and homelessness. This should include providing examples of good practice, for example, the sample Data Protection Impact Assessments (DPIAs) and Data Sharing Agreements (DSAs) that have been developed to support data linkage around homelessness. This should then be supported at the local level through the duty to collaborate.	NHS England Local authorities Health organisations	Amber
Preventing inequalities and unfairness	It has been reported that there has been lower uptake of the Covid-19 vaccine among people with experience of homelessness, in comparison to the general population. This poses a serious risk to public health. NHS England should work with local authorities and homelessness organisations to develop and implement effective delivery plans to ensure that this cohort are able to access the flu and Covid-19 vaccine. This should include tailored communication, alongside proactive in-reach and outreach programmes.	NHS England Local authorities Homelessness service providers	Green

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Preventing inequalities and unfairness	NHS England and Improvement have released service requirements asking Primary Care Networks (PCNs) to 'work from October 2021 to identify and engage a population experiencing health inequalities within their area, and to codesign an intervention to address the unmet needs of this population. Delivery of this intervention will commence from March 2022.' As people experiencing homelessness and rough sleeping experience some of the worst health inequalities in society, PCNs should identify them as a population to engage with as part of these service requirements.	Primary Care Networks (PCNs)	Green 🟢
Preventing inequalities and unfairness	Health organisations should ensure that mainstream services are accessible to people experiencing homelessness and rough sleeping. This can be improved upon by providing flexible appointment times and training for staff to increase understanding of issues related to homelessness.	Primary Care Networks (PCNs) Health organisations NHS England and Improvement	Amber-Green 🟡🟢

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