

Response ID ANON-52PE-EFZM-E

Submitted to **Rough Sleeping: Homelessness Strategy Consultation**

Submitted on **2020-09-10 13:57:58**

Rough Sleeping: Homelessness Prevention Strategy Consultation

1 What is your name?

Name:

[REDACTED]

2 What is your email address?

Email:

[REDACTED]

3 What best describes your interest in this consultation?

Working in the homelessness sector

Please state:

Birmingham and Solihull Women's Aid

4 Do you agree the our overall approach of the strategy?

Yes

If you selected no or not sure to this question please tell us why?:

We do agree with the overall approach of the Strategy, however, we are concerned with ensuring that the approach captures nuanced detail which is needed in ensuring some women at risk of or who are rough sleeping are offered the best response. This detail must take into consideration the context in which people who are at risk or are rough sleeping find themselves in. In regards to women who may be at risk of or who are rough sleeping, this is the context of violence against women and girls. In this capacity, the Strategy could do more in terms of prevention and addressing the issues which lead to rough sleeping in the first place.

The Strategy provides an adequate overall approach at supporting people who find themselves at risk of or who are rough sleeping, but perhaps doesn't go far enough to address full and proper prevention. The action points could be more clear and detailed in order for it to avoid ambiguity.

5 Do you agree with our universal level approach and actions for preventing rough sleeping?

Not Sure

If you selected no or not sure to this question please tell us why? :

The actions need more clarity as they could be interpreted ambiguously.

The first action, in "Raising public awareness around rough sleeping including how to help" seems well intentioned but it is difficult to understand the full impact intended. Educating the public on the cause of rough sleeping to raise empathy and consciousness and to create collective action is a great way to combat stigma. It can also create great community led initiatives to provide rough sleepers with food, bedding and warm clothes, water and other essentials. However, it seems a missed opportunity to not include raising awareness of support services to people who are at risk of or who are rough sleeping, so that they know what they can access. This specific and targeted awareness raising could be viewed as a soft approach to prevention or crisis relief.

The second action, "Improve how services work collectively prevent rough sleeping through continuous learning and improvement", seems to be promoting sharing best practice and encouraging mutually beneficial multi-agency work. We wholeheartedly agree with this approach, and call for the inclusion of 'specialist organisations' to be included here. The importance of specialist services being included in multi-agency work to share best practice enables genuine holistic approaches to take place which enable the support of multiple and complex needs to be addressed appropriately.

We believe that the third action listed, "Work with voluntary, community sector and faith sectors to promote COVID considered community outreach and support", should address all of the work that has been carried out by these groups over the lockdown period in response to COVID. Working with the voluntary, community and faith sectors is important to encourage grassroots change, since the organisations which work within these sectors are providing front line support, often specialist, and working with some of the most vulnerable groups. This is especially true as a consequence of cuts to public services budgets. These organisations act from a place of great knowledge and have a lot to share with local authorities in the way of best practice and knowledge on community issues.

6 Do you agree with our targeted actions and approach to preventing rough sleeping?

Not Sure

If you selected no or not sure to this question, please tell us why?:

The key actions in this section need more clarity around them as they are fairly ambiguous and could be misinterpreted.

The first key action, "Enhancing access to housing advice, prevention services for single adults (including couples without children)" excludes single mothers. By explicitly including those affected by domestic abuse as being at greater risk of rough sleeping, then excluding single mothers is to ignore the context of the issue at hand. It is important to factor in to this section that domestic abuse is still one of the most common reasons to homelessness in the City, and so proper understanding of the demographics of people represented in this group and the context of this is important in order to address target groups, without generalising a response to them. Targeted prevention must take into consideration both contextual issues which lead to people being at risk of or who are rough sleeping, as well as use evidence and intelligence. If we don't focus on these distinct issues in Birmingham, the Strategy and solutions offered will not help and the problems

will get ever more complex. By understanding that single people, also includes single mother's affected by domestic abuse, the Strategy should be focussing on the pathway which exists currently, the specialist Housing Options Hub which is run in collaboration between Birmingham and Solihull Women's Aid and Birmingham City Council. This kind of solution and preventative measure ensures that the targets identified as being at risk or who are rough sleeping are able to access specialist services which are able to provide holistic and nuanced support to them. This in turn, provides an appropriate safety net and pathway which means genuine prevention methods have been set which understand contextual issues.

Furthermore, the first action point should make clearer that those who have been identified as vulnerable face exacerbation of these vulnerabilities if they are also faced with intersecting issues such as race, sex, disability and age. By acknowledging these issues, the Strategy would be even better placed when working with specialist community organisations, in the approach they take with prevention and the type of crisis relief, support and move on people are offered.

It is unclear what the second action, "Putting in place clearer routes into local authority temporary accommodation to ensure prevention from rough sleeping for single adults is maximised" is referring to. We support the ongoing use of the routes which currently exist, but there are currently multiple and already clear pathways into local authority temporary accommodation for people at risk of homelessness or rough sleeping. This includes the duty placed on public authorities to refer, the offices at Newtown and the specialist Housing Options Hub run in collaboration by Birmingham and Solihull Women's Aid and Birmingham City Council. The issue which would be important to focus on here has been mentioned before, in regards to running an effective and targeted campaign to raise awareness of these services to the people who do or may need them. Furthermore, the focus here could be much more so on the availability of the temporary accommodation and how safe and appropriate it is.

We welcome the overall premise of the third action, "Engagement with providers of supported exempt accommodation to promote good practice opportunities in reducing homelessness and rough sleeping", if in fact it is referring to the regulation and standardisation of exempt accommodation in line with registered providers. It is very important that the accommodation that those at risk of or who are rough sleeping are not put into situations which exacerbate the reason they found themselves in that position in the first place, or, to make their situation worse. The response that is provided to people in these vulnerable positions should be specialist, steeped in best practice, holistic, nuanced and delivered by qualified professionals in the sector who are regulated. Unless registered providers, or specialist organisations are working with the exempt providers to offer this service, then this could be a dangerous path to go down and be putting people at further risk. Exempt providers should be provided with opportunities to become registered and regulated organisations also.

7 Do you agree with our rough sleeping crisis response approach and actions?

Unsure

If you selected no or not sure, please tell us why?:

We agree with the first action point, "Embedding multi-agency working arrangements covering the full range of issues amongst rough sleeping community." This is the work that community, voluntary and faith groups have been carrying out for years across the City. This is why a multi-agency response which includes all of these groups is so important, because they hold so much knowledge and best practice.

The second point, "Ensuring there is room for all people on the streets including severe weather emergency provision in way that is safe and meets COVID-19 requirements", is both a necessary response, but also possibly worrying. Firstly, we believe it is a necessary response, if no accommodation alternative is available to the person in that moment. This takes us on to why it is possibly worrying. This action point is possibly worrying because it normalises rough sleeping by providing measures which enable it to happen, rather than providing the best possible solution, which is to accommodate people in safe and secure housing off the streets. However, the wording of the point is not very clear, and so this could be a misinterpretation. We suggest that the wording and grammar throughout the consultation is checked in order to prevent these ambiguities from being interpreted in the revised Strategy, as this could have negative consequences.

We agree with the third action point, "Putting in place a team of service navigators to support the most entrenched long-term rough sleepers into services and accommodation." People who have long-term struggled to get out of sleeping rough and into safe accommodation should be provided with support which helps them navigate what it is that is a barrier. However, we question whether a local authority figure is best placed to do this. In our experience as specialist advocates, we are able to challenge or question decisions or systems made by public authorities on behalf of our service users. Often, this works in favour of the service user who is then able to access a more appropriate support or service being provided to them. The benefits of a third party specialist supporting and advocating for those who are at risk of or who are rough sleeping would be that they have access to someone who does not have a conflict of interest and who is able to provide them with advice which is nuanced to their situation.

We are particularly passionate about the fourth action point, "Establishing clearer support pathways for destitute rough sleepers with no public funds and having in place reconnection support to those arriving on the streets from outside of the city." As specialists in the women's rights sector and human rights, we believe that everyone should have equal access to public services no matter their immigration status. This is a principle supported by both the Istanbul Convention, when it comes to women affected by domestic abuse having access to support by a public authority, and under several Articles of the UN's Universal Declaration of Human Rights. All women, and people, who are deemed to have no access to public funds due to their immigration status should be recognised as people first and foremost. These people often present with very complex situations which need specialists to help support them and navigate them through to the system to secure safe accommodation and sound advice. We also suggest that this point is expanded to include that no one will be penalised on the basis of their immigration status, and that they will not be reported or handed to the Home Office on the basis of presenting to or for the support they receive under this Strategy.

We advise that Birmingham City Council rolls out this measure to all of its Strategy's and ensures that it is also working with central Government to ensure this is the case as a blanket statement to all policies and legislation.

As one half of the collaborative partners of the Housing Options Hub, Birmingham and Solihull Women's Aid has supported many women deemed to have no recourse to public funds who were at risk of or were homeless and affected by domestic abuse. We are proud of the work we do to ensure all women are offered equal access to this type of support.

8 Do you agree with the approach to rough sleeping recovery and additional actions?

Yes

If you selected no or not sure, please tell us why?:

We wholeheartedly agree with all three of the additional areas for action in this section. Specialist, professional and community based support is really important to ensure that people have their needs met holistically which enables them on to recovery in the most appropriate way. The specific mention of women in this section acknowledges the nuanced circumstances in which women end up rough sleeping. As a specialist organisation which seeks to end violence against women and girls, we put great emphasis on the many issues which impact women and girls specifically. We also recognise that domestic abuse cannot be viewed as a silo issue, but one which can result in impacting and involving many other societal issues such as homelessness. The support we are able to provide women and girls through this lens ensures that we are able to provide a safe environment for women and girls to disclose their experiences. This process ensures

women and girls feel safe and thus specialist support staff are able to identify their needs, any risks and put together comprehensive safety plans and measures in place with them. This kind of support, along with the expert knowledge, means women and girls are more likely to trust the support staff which means they are able to make well informed decisions based on the advice given to them. This can lead to better outcomes for these women and girls, and even if they don't, women and girls trust the support staff enough to contact them for support in the future. When it comes to housing, especially in the context of domestic abuse, it can mean the difference between living in fear at increasing risk or a place of safety. Therefore, acknowledging this in the Strategy is really important. In relation to the Covid-19 lockdown this is especially significant. In the context of domestic abuse, we know that lockdown exacerbated some women's experiences and their ex/partners treatment of them. With the easing of lockdown, we have seen significant numbers of women and girls contacting the service via various support routes, and asking for safe refuge accommodation. In the event of another lockdown, or even with increasing risk, women must be provided with this specialist support in order to ensure their safety is prioritised.

Another factor to consider when it comes to women and girls and homelessness is that rough sleeping can mean a number of different things. Even if women are not sleeping on the streets, they may be staying with friends or family, or sofa surfing. Sofa surfing in particular can lead some women in to precarious situations, or even relationships which are precarious due to their living conditions. Including this understanding and definition of rough sleeping in the Strategy would be important.

We would further suggest that the word 'female' is changed to women and girls to avoid ambiguity.

We would ask that the Strategy perhaps be more specific as to the type of support which would facilitate this work, including naming the provision, such as women-only refuges, women's specialist support services. This would both make the issues faced by women who are at risk or who are rough sleeping more prominent and ensure that specialist organisations providing these services are able to align themselves even more closely with the Strategy. This alignment will also further help when it comes to providing evidence in tenders and bids for funding for these very services.

9 Do you agree with the approach and priority actions for helping people to move-on from rough sleeping?

Not Sure

If you selected no or not sure, please tell us why?:

This approach is also rather ambiguous and needs more clarity. Apart from what the question itself has stated about the need for more accommodation across the City, it is also important who and how this is provided to those at risk of or who are rough sleeping.

The first point, "Co-locating BCC Housing Options services with voluntary sector provision to provide enhanced access to for those clients potentially on pathway to rough sleeping – particularly single adults (and couples without children)", needs to clarify whether it is referring to enhancing its specialist partners and strengthening them. The need for specialist knowledge from the voluntary sector is important since these organisations provide best practice and help to address more nuanced needs.

The second point, "Assessing and making better use existing supported exempt accommodation sector housing across the city where this is appropriate for supporting planned moves out of emergency accommodation", raises the same concerns as we addressed in question 6. It is really important for people who are looking to move on in their lives from adverse experiences that they are able to do so in safe environments and have the opportunity to recover. We are concerned that exempt accommodation, unless partnered with specialist organisations, will exacerbate conditions for people.

The last point in this section, "Maximising national, regional funding and other opportunities to secure move-on opportunities for rough sleepers such as the Rough Sleeping Initiative (RSI), Everyone-In, Next Steps Accommodation, West Midlands Combined Authority RSI" makes sense. Collective funding applications enable organisations to deliver a host of multi-agency run holistic services which are more beneficial to service users. We are concerned however of who would be involved in the applications and the reasons why. We believe it is important for specialist and established organisations to be included as a standard practice due to the many reasons set out in this response.

10 Any further comments?

Please use box below if you would like to make any further comments:

11 About You: Please state your age group.

Age group:

25 to 34

12 About you: What is your gender?

Gender:

Female

13 About You: What best describes your ethnicity?

Ethnicity:

White: Other

14 About you: What is your sexual orientation?

Sexual Orientation:

Heterosexual

15 About you: What best describes your religion or belief?

Religious Belief:

No religion