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To: Policy and Resources Cabinet Committee - 20 November 2018

Subject: Placements of Homeless Households into Kent

Classification: Unrestricted

Summary:

This paper and the accompanying presentation updates the Committee on the current position in relation to placements of homeless families from London into large single sites in Kent.

Recommendation(s):

The Policy and Resources Cabinet Committee is asked to:

- (1) **note** and **comment** on the findings presented
- (2) **endorse** efforts to ensure successful outcomes for those already placed
- (3) **support** the multi-channel approach to deter future large-scale placements
- (4) utilise their networks to continue to emphasise their unsuitability

1. Introduction

- 1.1 In March 2018 Kent Council Leaders, a Board made up of the Elected Leaders of Kent & Medway's 14 Local Authorities supported by their Chief Executives (or equivalents), commissioned a study be undertaken to understand the profile, needs and service usage of those placed into large-scale sites of temporary accommodation in Kent by London Boroughs under homelessness duties.
- 1.2 The rationale for this study was to determine the impact of large-scale placements on the county to be able to inform dialogue with Government Departments and London Boroughs, assist Kent's Local Authorities and wider public services in quantifying the potential risk of future placements and plan services accordingly, and enable better understanding of the needs of those already placed in the County, to ensure they are sustainably integrated into the local community and thrive and contribute positively to the future of the area.
- 1.3 The Kent Public Health Observatory (KPHO), which provides public health intelligence to the Public Health Division and supports health related work across the Council was tasked with leading this piece of analysis, utilising tools including Kent Integrated Dataset, Schools and Police Data, findings of which will be presented to Members today.
- 1.4 The Local Government Association has also commenced a national piece of work in response to concerns from Kent and other Local Authorities across the country.

2. Background

- 2.1 Kent and Medway has for many years experienced placements of vulnerable people including Looked After Children with a multitude of needs and vulnerabilities from London and further afield, with local services stretched and local communities impacted. This has been made more challenging due to the lack of timely and consistent information from the out-placing authorities.
- 2.2 In summer 2016, a new trend emerged with the procurement of large single sites by London Boroughs for use as temporary accommodation and the subsequent placement of homeless families from the capital, posing real challenges to Kent's public sector services. These included placements from LB Redbridge who had secured a long-term lease of Howe Barracks in Canterbury; a recently vacated military accommodation site, and placements from several London boroughs (including Newham, Waltham Forest, Croydon and Enfield) into newly converted office blocks under permitted development in Maidstone town centre.
- 2.3 At Howe Barracks, long-term residential use was already established prior to the closure of the facility in 2015, and Canterbury City Council had wanted to secure the site for families on their own social housing waiting list but were outbid. However, the office conversions in Maidstone were new units of accommodation in areas with limited residential populations, effectively creating new demand on services in very central areas with limited infrastructure and service capacity in place to support the households and without developer contributions to fund them.
- 2.4 Conversions from office to residential under permitted development, like those in Maidstone, are the most conducive to procurement for large-scale placements of temporary accommodation and have been utilised across the country for this purpose. With the recent announcement in the Budget of a consultation on extending permitted development use class orders to 'typical high street uses', in the context of a large number of vacant premises in the centres of Kent's towns, this could bring more suitable properties into scope for similar use, again without developer contributions to fund local services capacity.
- 2.5 Of real concern was the lack of information from some placing authorities about the complex needs of some of the families being placed and the ability of local services to accommodate these needs. Public Health were commissioned to establish an accurate evidence-based picture of profile and service demand to ensure we can achieve the best outcomes for those families already placed and inform future dialogue with out-placing authorities, service managers and Elected Members.

3. Ongoing Work

- 3.1 With the housing market in the south-east and particularly London becoming more challenging and households in need of temporary accommodation steadily increasing, it became necessary to take urgent action in an attempt to engage London housing authorities and through this address the risks for both families placed out of area and Kent public sector agencies associated with failure to follow notification protocols.
- 3.2 Kent Council Leaders lobbied Government, Lords, London Councils, the Local Government Association, and brought together Kent's MPs for an extraordinary joint

meeting where they shared Local Authorities' concerns and nominated Helen Grant MP as lead, subsequently writing jointly to the then Housing Minister, Gavin Barwell. Local and national media have taken a keen interest, and there have been questions asked by Kent's MPs in Parliament.

- 3.3 In parallel, a collaborative dialogue has been established via the Kent Housing Group between Kent's Local Authorities and London Councils (the representative body of the London Boroughs) led by Maidstone Borough Council and Kent County Council. This has resulted in a better understanding of the pressures faced by receiving authorities and the unsuitability of office-to-residential conversions for this use in Kent. Since this dialogue has begun, there has been no further procurement of sites for large-scale placements from London into Kent, despite similar sites being secured and utilised in other parts of the South-East and further afield. A good working relationship has developed which is valued by all and has enabled Kent Authorities to quickly and efficiently test rumours as soon as they emerge.
- 3.4 In August 2018 the Local Government Association commenced a piece of work concerning out of area placements with the aim of ascertaining the scale of the issue and the underlying drivers and conditions, with a significant focus being on Kent's experience. This work will establish a strong sector-wide evidence base on the impacts and outcomes on both the families being moved and the areas they are being resettled to and determine the degree of adherence to the law as it applies to out of area moves, local protocols, good practice guides and retained responsibility.

4. Analysis Findings

- 4.1 The analysis outlined in the presentation that accompanies this briefing identifies separate communities in Maidstone Borough Council (two sites) and Canterbury City Council (Howe Barracks) which collectively encompass the work to date on 'London Placements' to Kent. Due to the very specific nature of this work, precautions have been taken to prevent accidental disclosure of individual's identity. This includes the aggregation of strongly pseudonymised data within the Kent Integrated Dataset environment and a Re-identification Risk Assessment, where the risk of accidental disclosure is systematically considered and required mitigations are identified. The Kent Public Health Observatory have also been in liaison with the relevant officers in Maidstone Borough Council and Canterbury City Council to inform them of the scope and nature of the analyses.
- 4.2 Households differ in profile in Canterbury and Maidstone, a likely consequence of a difference in accommodation type, with larger houses at the ex-military site versus flats/apartments in the converted office accommodation. However, most are young families with pre-school or school age children.
- 4.3 Usage of many public services is lower than local averages, likely resulting in less average cost to the public purse than the typical local resident. However, usage of particular services such as Heath Visiting, Maternity Services and GP contacts is higher. When considering the profile of the families, this is to be expected.
- 4.4 Due to capacity constraints, households have had to enrol at various schools and GP surgeries over a large geography, and in Maidstone this has put pressure on a town centre practice that was already experiencing operational difficulties.
- 4.5 Initial analyses on police data demonstrate above average crime rates at the three sites, in particular Howe Barracks, however further work is required to test these

findings and understand the underlying reasons for this. Insufficient data granularity means it is not possible to distinguish perpetrator differences and there is anecdotal evidence that placed households may in many cases be victims rather than perpetrators. The figures were obtained from publicly available data and not adjusted for age structure differences and should therefore be treated with caution.

5. Next Steps

- 5.1 It is envisaged that the multi-channel course of action continues which will include a combination of:
 - targeted lobbying to secure better arrangements for notifying Kent authorities of out of area placements including via the LGA project mentioned above.
 - monitoring the impact of existing placements and reiterating the analysis to build a more robust picture over time.
 - monitoring so that any impact arising from the new provisions of the Homelessness Reduction Act can be identified quickly – for example the new prevention duty is location neutral and referrals can be made from a wide range of statutory and nonstatutory agencies.
 - intelligence sharing on sites that are or could become future targets for procurement by out-of-area Local Authorities or intermediaries who acquire property for the specific purpose of leasing it for temporary accommodation, particularly if permitted development use class orders are extended.
 - Continued collaboration with partners including Kent District and Borough Councils and London Councils to ensure risks associated with future placements are identified and acted on and to secure good outcomes for those already placed.
 - consideration of the long-term effects of the out of area placements as there is a risk that all responsibility and obligations for supporting those in temporary accommodation will transfer to Kent's Local Authorities after a period of 2 years – if the family has remained in temporary accommodation for that length of time.
 - Establishing from a public health perspective the long-term effects of placement on families' health and wellbeing.

6. Recommendation(s)

6.1 The recommendations are as follows:

The Policy and Resources Cabinet Committee is asked to:

- (1) **note** and **comment** on the findings presented
- (2) endorse efforts to ensure successful outcomes for those already placed
- (3) **support** the multi-channel approach to deter future large-scale placements
- (4) utilise their networks to continue to emphasise their unsuitability

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