



HOMELESS LINK

BREAKING THE CYCLE: EFFECTIVE PUNISHMENT, REHABILITATION AND SENTENCING OF OFFENDERS CONSULTATION RESPONSE

Homeless Link is the national membership organisation for agencies working with people who are homeless across England. We have more than 490 members, whose services range from local authority housing services, day centres, outreach services, residential care homes, hostels, supported housing, floating support through to employment, training and education.

Offending and Homelessness

We welcome the publication of the Ministry of Justice Green Paper and the opportunity to engage with the proposals at this stage of the reform. We endorse the broad principles of the document, particularly in terms of integrated working across sectors and the recognition of the impact of support needs around housing, substance use and mental health on reoffending, as well as the need to address these issues in holistic, innovative ways.

Reducing reoffending is of key concern to our members as clients with support needs around offending behaviour are greatly over-represented in homelessness services. Offending is one of the support needs that must be addressed in order to achieve successful resettlement into independent living. Our most recent survey of homelessness services shows that:

- three quarters of projects support prison leavers,
- nearly half of projects surveyed said more than half of their clients have connections with probation and
- 15% of services provide targeted services to prison leavers.¹

Homelessness services such as hostels already provide considerable input into delivering outcomes around reducing reoffending, not only through the provision of stable housing, but through connecting service users with support for substance use, mental health and education and training.

Homelessness increases the chances of re-offending. For example, ex-prisoners who are homeless upon release are twice as likely to re-offend as those with stable accommodation. There are a range of sources that also highlight the links between re-offending and homelessness:

- 15% of offenders were homeless prior to custody²
- 37% of prisoners state they will need assistance to find somewhere to live when they are released³

¹ Homeless Link (2011) Survey of Need and Provision, www.homeless.org.uk/snap

² Ministry of Justice 'Compendium of re-offending statistics and analysis' November 2010 p. 130

³ *ibid*

- Offenders who are homeless before entering custody are more likely to re-offend than those with settled accommodation: 79% are reconvicted at one year, compared to 47% who had accommodation⁴
- Around 23% of adult offenders under probation supervision are not in settled / suitable accommodation⁵

To inform this response, we consulted with our members' service users through our Client Advisory Panel⁶ and have drawn on our recent research conducted as a part of our 'Preventing Reoffending and Homelessness Together'⁷ project, which included a survey of homelessness services and criminal justice services staff and a series of focus groups with service users. We have focussed our response on the questions which have the most relevance to offenders who are homeless.

Q. 8 What can central government do to help remove local barriers to implementing an integrated approach to managing offenders?

Q. 9 How can we incentivise and support the growth of Integrated Offender Management approaches?

Q10 How can we ensure that providers from the voluntary and community sector can be equal partners in the delivery of this integrated approach?

Homeless Link supports in principle the greater use of IOM approaches. We believe that the best way to support the growth of IOM approaches and ensure voluntary sector providers, such as homelessness services, are equal partners is to engage them at the outset, rather than after the model has been devised and deployed.

Partnerships between, and within, each of these sectors is crucial to reducing reoffending. While there have been improvements around joint working with both commissioning and delivering services, this is patchy and inconsistent across different areas. Homeless Link is part way through a research project on how the criminal justice and homelessness sectors can work better together to reduce reoffending.⁸ Effective partnerships between criminal justice and homelessness agencies should underpin the approaches every local area takes when trying to reduce reoffending.

Recent Homeless Link research showed that many clients with multiple needs – such as offending behaviour alongside substance misuse and homelessness - do receive support from a number of different services. In each service the client will have a lead professional or keyworker assisting them with their progress. Unfortunately, good multi-agency working is not always available and thus the client is likely to have a number of support workers who are not in contact with each other. This situation is further complicated by the varied models that different support agencies use. For example, probation tends towards a risk minimisation model which may not be compatible with the recovery models used by many homelessness

⁴ *Ibid*

⁵ Communities and Local Government 'PSA 16 (Socially Excluded Adults) qualitative research on settled accommodation' March 2010 p. 18

⁶ Homeless Link's Client Advisory Panel is comprised of current and ex-clients of homelessness and related services. Their role is to advise Homeless Link on matters of policy and practice.

⁷ Homeless Link Preventing reoffending and homelessness together project, funded by the Monument Trust <http://www.homeless.org.uk/criminal-justice-project>

⁸ *ibid*

services and drug treatment services. Integrated working needs to include agreement on the support model on offer so that it complements each support need.⁹

We strongly welcome the focus on integrated working at a local level. To date our Preventing Reoffending and Homelessness Together project has highlighted that joint working practice is not embedded in some areas and that communication problems persist. A lack of information sharing protocols and active communication between the agencies which are working with the same offenders were perceived as major barriers. The principles of the Integrated Offender Management System which formalises partnership working and joint case management of an individual should be seen as essential practice. Without involving all partners – including substance use services, health, housing and criminal justice agencies - it is difficult to offer the coherent package of support which addresses all an individual's needs.

Based on our recent survey of criminal justice and homelessness sector staff we found that there are many committed staff in both sectors who are working hard to forge links across sectors in order to better support their clients. A key barrier in developing this further was a lack of commitment at a senior level to this aspect of their work, which means many staff are trying to do this work with little organisational support.

Survey respondents indicated that both formal and informal training plays a large role in improving cross sector working and supporting clients. Shadowing schemes with homelessness services were highlighted by criminal justice sector staff as having a positive impact on their work.

At a local level there are already numerous Homeless Networks which bring together accommodation providers, information, advice and guidance services, day centres, probation and other stakeholders. These Networks would provide an ideal starting point for supporting IOM approaches.

Single Homeless Project – Highbury New Park Project

Highbury New Park (HNP) is a 13-bed project for people who have had a significant offending history and who are homeless. It is run by Single Homeless Project (SHP) and is in the London Borough of Islington. HNP works with clients who are currently under the supervision of the probation service, which may include licence, community orders, curfew and tagging orders. The project works closely with the probation service and the area's Safer Streets Team with the aim of reducing re-offending and street activity. The project opened in April 2009 and as such does not yet have longitudinal results to demonstrate the success of the project's interventions.

The project was set up in partnership between the local authority, the criminal justice service and SHP on the basis of identified need in the Borough, but does not receive funding from the criminal justice sector and is funded entirely by the local Supporting People programme.

A key element of the project is the ability to provide continuity of stable accommodation should a resident re-offend and receive a very short sentence (custody of 13 weeks or less). Anecdotal evidence in the project suggests that the residents who were able to return to the project after a short custodial sentence and therefore did not have to worry about post

⁹ Homeless Link 'Preventing reoffending and homelessness together – Interim Report' February 2011
<http://www.homeless.org.uk/criminal-justice-project>

release accommodation found this to be a very positive experience. This experience made a significant contribution to shifts from pre-contemplative to contemplative and preparation stages of change. For many this was the first time they had left prison and returned to their previous address, an experience which meant gains made prior to custody were not lost and a major factor in the re-offending cycle was broken.¹⁰

Q. 11 How can we use the pilot drug recovery wings to develop better continuity of care between custody and the community?

Improving community based rehabilitation is clearly relevant to homeless clients who are over-represented in offender, drug and alcohol and mental health needs populations. However with the focus on abstinence based approaches, it is important to recognise harm minimisation as an important first step to recovery. Positive outcomes – for both clients and the funding for these services - should not be dependent on abstinence. Treatment orders need to be flexible and take this into account.

Our Client Advisory Panel noted that in the context of prison, drug recovery is well supported by the highly structured prison environment. But the sudden change at release to an environment without structure is the most vulnerable time for an offender with a substance use support need, even when they have done well in treatment. There is also a vulnerability to relapse if transferred to another prison, both from the stress, change of environment and change of structure and routines. Their suggestion was to ensure the offender has a clear structure to go to; drug recovery wings need strong links with providers in the community so that there is seamless provision of appropriate housing and links to drug treatment services in the community. Relapse prevention support needs to be in place before release from prison. Our client advisors suggested that drug treatment support needs to be in-reaching to prison and that the offender needs to have a relationship with the community based team before release, ideally the same support worker to ease transition stressors.

One of the models suggested by our client advisors was that offenders being released from drug recovery wings could go straight to day programmes in the community so that there is a graduated step-down in the structured environment to reduce the likelihood of relapse at this point. The client advisors highlighted the Camberwell Rise day programme¹¹ and Diamond Teams as doing good work in supporting offenders with drug support needs.

We are especially interested in short sentenced offenders and welcome the commitment to offer drug recovery support to those prisoners serving less than 12 months. Given the high reoffending rates for offenders without appropriate accommodation, providers of accommodation based services have an integral role to play in the community setting as part of a holistic rehabilitative approach.

Homeless Link has created a 'Clean Break' toolkit which was developed to assist commissioners, service providers and strategic leads for drug and housing services create more integrated housing and care pathways for drug users engaging in treatment services. The tool kit includes guidance on assessing individual needs as well as mapping local provision and identifying current pathways. See <http://toolkits.homeless.org.uk/cleanbreak>.

¹⁰ Meeting with deputy manager, Highbury New Park project, SHP, 20 August 2010

¹¹ http://www.blenheimcdp.org.uk/pages/rise_day_programme.html

At a local level, the housing needs of prison leavers must be at the centre of any resettlement plans, alongside measures to support them to engage with meaningful opportunities to help them return to employment or training. Currently, a lack of consistent support post-release, poorly resourced housing advice services in prison – which often are offered too late to help an individual plan their accommodation sufficiently – and a lack of integrated working by agencies in the drug, housing, and criminal justice fields undermine ex-offenders' recovery.

Q. 13 How best can we support those in the community with a drug treatment need, using a graduated approach to the level of residential support, including a specific approach for women?

There are many examples of community based accommodation projects for offenders with drug treatment needs. Projects should holistically address treatment and recovery alongside other needs such as housing, training and employment in order to achieve longer term positive outcomes. Particular models to consider for this vulnerable group of people are dispersed units with floating support available, focusing on support around finance and independent living skills. It is important that individuals are not placed in hostels with current drug users, even when this is on a temporary basis. Both offending and drug issues are worsened by being placed in accommodation that is in known drug using areas. This should be a consideration when homelessness applications are assessed and post treatment support plans are developed, including allowing flexibility around local connection conditions. In addition, there needs to be the recognition that many of the support services available are crucial to the recovery, and alternative delivery methods should be considered, such as outreach and flexible appointment systems.

The Together Women pilots show the value of offering women support in women only services.¹² Given the high levels of abuse and domestic violence suffered by women offenders, there should be the opportunity to receive support, in both residential and community settings, through women only programmes.

Q. 14 In what ways do female offenders differ from male offenders and how can we ensure that our services reflect these gender differences?

We welcome the acknowledgement of gender differences in the Green Paper. We fully endorse the findings and recommendations of the Corston Report. At the time of imprisonment 21% of women are lone parents with dependent children.¹³ There is no comparable statistic available for men as lone parents prior to imprisonment. Half of all women prisoners have dependent children. On release, many women are trapped in a 'catch-22' situation where they are unable to regain their children from care without suitable accommodation, and cannot access to social housing without being the main carer of their children.¹⁴ Women have greater incidence of homelessness prior to imprisonment with 20%

¹² Ministry of Justice, 'Conditional cautions: Evaluation of the women specific condition pilot', July 2010, available at <http://www.justice.gov.uk/publications/docs/evaluation-women-specific-condition-pilot.pdf>

¹³ Office of the Deputy Prime Minister, Social Exclusion Unit 'Reducing reoffending by ex-prisoners' 2002, p. 21, 104

¹⁴ Office of the Deputy Prime Minister, Social Exclusion Unit 'Reducing reoffending by ex-prisoners' 2002, p. 21, 104

having no stable accommodation, compared to 14% for men.¹⁵ The Corston Report noted that many male prisoners have a mother, partner, sister to take care of the home whilst they are away. However, women prisoners do not generally have the same security in the community and therefore custodial sentences resulted in greater breakdown of home and family relationships.¹⁶

The greater breakdown of family and community ties and large incidence of self harm that result from custodial sentences for women clearly shows that custodial sentences are not an effective rehabilitation for many women offenders. We support the use of the Women Specific Caution and the diversion from custody where appropriate to women's centres that address support needs in a holistic way.

Homelessness services are well placed to provide support to women offenders. However there needs to be greater provision of accommodation based services specifically for women.

Q15. How could we support the Department of Work and Pensions payment by results approach to get more offenders into work?

Many homelessness services take the lead on working with clients to break down the barriers to employment. These schemes generally share a personalised and flexible approach which is often delivered in the accommodation service directly. Dedicated staff are able to provide one-to-one support especially where longstanding support needs have interfered with education and the development of core skills in literacy and numeracy. Such schemes will need dedicated support from the Department of Work and Pensions to continue in a changing funding landscape. The MoJ could work with the Work Programme to ensure the value of these programmes is recognised and funded.

Q16. What can we do to secure greater commitment from employers in working with us to achieve the outcomes we seek?

Whilst the consultation document does not specifically discuss the needs of short and community sentenced offenders in terms of their work and training needs, our response is focused on what can be done in the community to support such offenders into work and the barriers they face in this process.

A nef (new economics foundation) for Business Action on Homelessness (BAOH) report¹⁷ identified that homeless people experience real or perceived discrimination, especially those with criminal records. There can also be prejudice around gaps in employment history.

Research by the CIPD¹⁸ reveals that more than 60% employers exclude groups with certain characteristics from the recruitment process. It found that UK employers are most likely to

¹⁵ MoJ 'Statistics Bulletin: Offender Management Caseload Statistics 2009 An overview of the main findings' July 2010, p. 10

¹⁶ Home Office 'The Corston Report – A review of women with particular vulnerabilities in the criminal justice system' 2007 p. 21

¹⁷ nef (the new economics foundation) for Business Action on Homelessness (BAOH) 'Work it out - barriers to employment for homeless people' 2008

¹⁸ The Chartered Institute of Personnel and Development
<http://www.cipd.co.uk/pressoffice/articles/31082005092814.htm?IsSrchRes=1>

exclude those with a criminal record, those with a history of drug or alcohol problems and those with a history of long-term sickness/incapacity. Many homeless people share these backgrounds.

Homeless people often experience long-term unemployment and worklessness as well as significant disengagement from education, making the process of entering or returning to the workforce more complex and requiring more support than for non-homeless people. Recent MoJ statistics on re-offending show higher rates of reoffending for those individuals not in employment.

Among our members there are a number of models in use to address the barriers and provide training at the same time as supporting the service user across their needs.

Social Enterprise models are gaining momentum in the homelessness sector as a way of delivering training, employment and funding in one. Many homelessness organisations have developed this model with the support of local employers (see for example 'Create', based in Leeds¹⁹ and the Sandwich People, winner of this year's Michael Whippman award²⁰). Spark is a development and investment programme designed to build and inspire organisations to tackle homelessness through social enterprise.²¹

Employment programmes for former service users. These initiatives have often taken root within the homelessness, drug or alcohol sectors. However models are eminently transferable to different sectors.

'Link worker' models: some agencies also provide consistent support via an Education/Employment worker as the client makes the transition to employment. A study conducted by Centrepont showed improved education and employment outcomes for young people when they had access to a dedicated Education Support Worker in their accommodation.²²

There has been evidence to demonstrate the cost benefits of providing targeted employment schemes for homeless people. The Tyneside Cyrenians report below, for example, showed significant savings to the public purse through the reductions in criminal activity, medical interventions and dependency upon benefits as a result of training and employing these individuals.²³

¹⁹ See www.createleeds.org

²⁰ <http://www.homeless.org.uk/news/social-enterprise/sandwich-people-win-homeless-links-inspirational-michael-whippman-award> Retrieved 1 October 2010

²¹ See www.sparkchallenge.org

²² Centrepont 'Working for your future: Testing the impact of dedicated employment support in London and Newcastle' 2006 <http://www.centrepont.org.uk/assets/documents/publications/policy-briefings/Centrepont-WorkingForYourFuture-2006.pdf>

²³ Wigmore, C. 'Virginia House Self Build Economic Cost Benefit Analysis' Tyneside Cyrenians 2009

St Mungo's traineeship programme has been running since 2008 and (ex-) service users are contracted for one year into a project and receive personal support and mentoring throughout the year. During the contract they also complete an NVQ2 in Health and Social Care. The programme is also flexible in terms of the greater challenges some trainees will have in their first year of work, such as working with trainees to support them around absences and errors. As they near the end of their contract, trainees are given support to apply for permanent jobs. Of the first successful applicants in 2008, 75% went on to secure permanent roles within St Mungo's.²⁴

An Economic Cost Benefit Analysis from **Tyneside Cyrenians** on the **Virginia House Self Build** highlights the economic cost benefit achieved by training and then employing three formerly homeless clients on the re-building of a hostel for homeless people. The report details their costs to the Criminal Justice System, the NHS, and Department of Work and Pensions in the five years leading up to their training and those incurred since being in fulltime employment. It shows that providing training and work opportunities for those who are marginalised from the labour market saves the public purse significant amounts of money through a reduction in criminal activity, medical interventions and dependency upon benefits..²⁵

Q. 18 How can we better work with the private rented sector to prevent offenders from becoming homeless?

Our client advisors recommended the Real Lettings (www.reallettings.com) model, where a social lettings agency takes responsibility for the tenancy agreement, providing guaranteed rent to the owner and lets the property to people in need of support. Benefits of this model were identified as:

- greater security of tenancy (in terms of length of tenancy and support),
- private let with built-in support,
- flexible landlord more approachable if there are problems. Real Lettings also provide more traditional tenancy agreements with sympathetic owners.

This model was seen as an ideal way to equip ex-offenders with the independent living skills needed to maintain their own tenancy, with enough support and security to assist them through vulnerable periods.

Our Client Advisors had a number of concerns about support to maintain a tenancy offered to people in the private rented sector. Their suggestions were that tenancy support services need to be more visible to tenants and that there needs to be a mechanism for notifying tenancy support agencies when issues arise. For example, information on tenancy support services in the area should be provided to a tenant upon signing a lease and that a landlord should be obligated to contact a tenancy support service should rent fall into arrears in the first instance.

²⁴ <http://www.mungos.org/apprenticeship> Retrieved 4 October 2010

²⁵ Wigmore, C. *Virginia House Self Build Economic Cost Benefit Analysis*, Tyneside Cyrenians, 2009

We welcome the plan to reduce statutory barriers around “intentional homelessness” and local connection by working with the Department for Communities and Local Government. If we are committed to a rehabilitative approach then it is important to have as few barriers to success as possible. This is especially so in terms of local connection, when an ex-offender is trying to turn their life around by not returning to places and people where relapse would be difficult to avoid. There should not be statutory barriers to taking this positive step.

Something like, though more eloquently: Aswell as PRS, need to ensure a range of suitable housing options locally. Some ex offenders may need supported accommodation to help address other needs first. Important to protect funding for these as we know they produce good outcomes etc etc.

Q19. How can we ensure that existing good practice can inform the programme of mental health liaison and diversion pilot projects for adults and young people?

Liaison and diversion projects need to have a holistic approach and take into account other needs which could impact on successful 'diversionary' outcomes – i.e. housing need, substance misuse. To do this, staff who co-ordinate diversionary schemes need to have a good understanding of how to refer effectively and support clients to address these needs. In particular, those with dual diagnosis need specialised support, rather than being turned down by mental health or substance use services due to their other support needs. Drug treatment needs to be far better integrated into mental health services. This was a clear commitment in the Department of Health's recent Mental Health Strategy, No Health without Mental Health, and is a commitment which must be shared with 'Breaking the Cycle' to give local services responsibility to address the needs of people with a dual diagnosis.”²⁶

Q20. How can we best meet our ambition for a national roll-out of the mental health liaison and diversion service?

The mental health liaison and diversion service will need to integrate into other services which clients will need to access to achieve prolonged desistance – e.g. housing related support. Mental health liaison and diversion services will need to take these into account the wide range of mental health needs and recognise some offenders will experience severe needs which may not have been diagnosed. This feeds back into the issue of ensuring there are effective referrals into diversionary schemes and ensuring staff making referrals are able to access a wide range of services tailored to the needs of the service user.

Q21. How can we reshape services to provide more effective treatment for those offenders with severe forms of personality disorder?

A recent guide from the Department for Communities and Local Government and the National Mental Health Development Unit reports that the level of personality disorder in adults living in hostels may be as high as 60%.²⁷ Whilst these clients may not meet the criteria for “severe” personality disorder they do experience severe disruption to their lives as a result. We know that many of these clients have offending histories. A further barrier to reducing reoffending and providing appropriate housing for such service users is that many

²⁶ Department of Health, No health without mental health, Feb 2011

²⁷ Department for Communities and Local Government and the National Mental Health Development Unit 'Good practice guide: Meeting the psychological and emotional needs of homeless people' May 2010 p. 7

have not had a formal diagnosis and have thus never formally engaged with treatment services.

Again, it is imperative that there are strong links with housing services to ensure that appropriate accommodation is integrated into mental health provision for those with personality disorder. We would also recommend the adoption of the principles of the DCLG and NMH DU's good practice guide 'Meeting the psychological and emotional needs of homeless people'²⁸ in developing services. Diversion services could follow a similar model to Together Women projects and provide a fully integrated service.

Q. 23 What is the best way of reflecting the contribution of different providers within a payment by results approach for those offenders sentenced to custodial sentences and released on licence?

Any PBR approach would need to recognise that many different services are a part of the journey out of offending. We have concerns that the PBR model could preclude integrated working and support by providers outside the CJS if there is a prime and subcontractor model that is controlled by the prisons or probation. There is a need for a wide variety of skills and experiences in commissioning local services and we would recommend the "prime" be consortia of local providers from across the statutory and voluntary sector spectrum. Such consortia should have commissioning experience and a good knowledge of local need and provision.

Given the complexity of the support needs and the often entrenched nature of re-offending it may be difficult to determine which service delivers which outcome in reducing reoffending, rather it is a holistic process and should be developed and delivered holistically.

Please see our response to Q. 27 for how these shared outcomes could be measured.

Q. 24 What is the best way of developing the market to ensure a diverse base of providers?

The structure of the market needs to recognise the spectrum of support needs and providers. As in Q.23 the broad range of services already working with clients need to be a part of the development of the model from the outset, not just add-on delivery partners.

The Green Paper is clear that there is motivation to work with a more diverse range of providers and acknowledges there will need to be consideration of the barriers that may be experienced by smaller voluntary sector providers in taking part. As the model is yet to be developed it is difficult to ascertain exactly how homelessness services will be able to engage and what the commissioning / contracting structures will be. As most homelessness services already have ex-offenders as clients and many have programmes specifically to address the support needs of offenders there is an imperative to be a part of this process, especially in terms of influencing the methodologies.

²⁸ This document is available at <http://www.nmhd.org.uk/silo/files/meeting-the-psychological-and-emotional-needs-of-people-who-are-homeless.pdf>

Q.25 Do you agree that high risk offenders and those who are less likely to reoffend should be excluded from the payment by results approach

Whilst we appreciate the thinking that underpins this question we are concerned that high risk offenders in particular will be left out of support which they need. There could be a threshold at which those unlikely to reoffend are excluded as they probably do not require the same level of support as others. For high-risk offenders it would be a disservice to exclude them from the potentially innovative and targeted support services which may develop under a PBR model. The challenge lies in developing a measurement tool appropriate to various levels of risk and a framework for payment that reflects the varied needs of different clients.

Q. 27 What is the best option for measuring reoffending and success to support a payment by results approach?

Payment frameworks must consider the time needed to address an individual's offending behaviour, particularly when this sits alongside other complex needs such as substance use and mental health related problems. Recovery is unlikely to follow a linear path, and can be a long process. Milestones should therefore be built into the framework which recognise 'softer' outcomes such as reduced harm to self, reduced frequency and seriousness of offending, and increased motivation. Payment By Results (PBR) should be based on a recognition that clients have diverse needs and capabilities and should therefore use a distance travelled model for gauging level of remuneration.

It can be difficult to separate reducing reoffending from other support needs and goals. A good model for monitoring this is the Outcomes Star, a comprehensive tool for exploring and measuring outcomes in the homelessness service setting.²⁹ The Outcomes Star has ten "ladders" which cover an individual's journey along motivation and taking responsibility, self-care and living skills, managing money and personal administration, social networks and relationships, drug and alcohol misuse, physical health, emotional and mental health, meaningful use of time, managing tenancy and accommodation, and offending.³⁰

We also ask that the strategy recognises that a PBR framework needs to carefully consider the wide number of factors and agencies which contribute to an individual's recovery. The homelessness sector provides a range of employment and training, meaningful activity, advice and other services – in addition to accommodation – which have a huge impact on reducing reoffending rates. We believe that only with continued investment in these services can sustainable and cost effective outcomes be achieved.

Q. 31 How do we involve smaller voluntary organisations as well as the larger national ones?

The key to ensuring a wide range of providers is in developing tendering and payment processes which reflect the realities of the organisations involved. Where a larger provider may be able to defer payment for a period this is not a viable option for smaller providers who will be more reliant on up-front payments in order maintain their organisation's solvency.

²⁹ Originally developed by Triangle Consulting for St Mungo's, the Outcomes Star has been subsequently widely tested and revised for the London Housing Foundation.

³⁰ www.homeless.org.uk/outcomes-star

Q. 57 What are the other ways in which we can work effectively across Government to increase local flexibility to tackle offending?

We agree that there are some benefits to local flexibility but believe that there is a need for strong leadership at a national level to ensure accountability for this client group. There is evidence that localism is already having impacting on disadvantaged groups, for example through disproportionate cuts to Supporting People services which support some of the most vulnerable people in our communities, including ex-offenders. There is a need for a way to monitor and mitigate such unintended impacts.

Our own research indicates there are likely to be significant reductions in service provision in the homelessness sector in the coming twelve months. This will place even greater pressure on services to have stricter criteria on access which may further disadvantage ex-offenders with housing needs.

To think only of such initiatives as 'cross government' is limiting – rather there should be 'cross landscape' working to increase local flexibility that is inclusive of statutory and voluntary sector organisations, especially those working on the frontline of service provision. We highlight two examples of working effectively across government and other sectors to improve service delivery:

- The Ministerial Working Group on Preventing and Tackling Homelessness, in which the MoJ is involved with seven other departments, is a good model for working effectively across government on an issue that impact upon a wide number of departments, as does re-offending.
- The Home Office's Reducing Re-offending Unit is working with statutory and voluntary providers to enable a 'knowledge group' for sharing effective practice.

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