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07 December 2018

Dear Member,

Health and Adult Social Care Select Committee - Wednesday, 12 December 2018

Please find enclosed the following document(s) for consideration at the meeting of the Health and Adult Social Care Select Committee on Wednesday, 12 December 2018 which was unavailable when the agenda was published.

Item no: 6 on the agenda will be available to view live via the Internet at this address:

http://www.westsussex.public-i.tv/core/portal/home

Item 6

6. Strategic Budget Options (Pages 3 - 152)

These papers were delayed to allow for the consultation responses to be considered.

Yours sincerely

Tony Kershaw
Director of Law and Assurance

To all members of the Health and Adult Social Care Select Committee



Health and Social Care Select Committee

12 December 2018

Strategic Budget Options – Housing Related Support, Local Assistance Network (LAN) and Minimum Income Guarantee

Report by Executive Director for Children's, Adults, Families, Health and Education (CAFHE) and Interim Director of Adults Services

Summary

At its meeting on 27 September 2018, the Health and Adult Social Care Select Committee considered draft Cabinet Member decision reports regarding proposals relating to the County Council's investment in housing related support contracts, the Local Assistance Network (LAN) and the Minimum Income Guarantee (MIG) which is the level of support the County Council provides to people receiving local authority-arranged care and support, other than in a care home, to retain a certain level of income to cover their living costs. The Committee provided comment to the Cabinet Member for Adults and Health regarding the process for engagement with stakeholders on the proposals. The Committee asked that the Cabinet Member ensure that all those who would be affected by the proposals had the opportunity to engage in a consultation process, including strategic partners, and that the Committee should receive evidence from a variety of stakeholders at its next meeting, following the end of the consultation period.

A period of engagement ran from 1 October to 3 December 2018 to inform final proposals, which are attached to this report as draft Cabinet Member decision reports.

The focus for scrutiny

The Committee is asked to consider the attached draft Cabinet Member decision reports and provide comment to the Cabinet Member for Adults and Health prior the formal decisions being taken later in December 2018. Members are invited to note the possible areas of focus set out in paragraph 4.1.

Proposal

1. Background and Context

- 1.1 A number of strategic budget options were published in the West Sussex Forward Plan of Key Decisions on 27 August 2018. These proposals reflected the current financial challenges faced by the County Council and are part of budget process 2019/20.
- 1.2 At its meeting on 27 September 2018, the Health and Adult Social Care Select Committee (HASC) considered draft Cabinet Member decision reports regarding these proposals, as well as the process for engagement with stakeholders.

- 1.3 The HASC considered issues relating to the planned engagement process in terms of timing, stakeholders to be engaged, process for member engagement, how engagement should be carried out, how information gathered would be analysed and reported and how it would inform the final funding decisions. The Committee recommended that;
 - All service users likely to be impacted by the proposals should have the opportunity to be consulted,
 - Members of HASC should have the opportunity to receive evidence prior to and at the next meeting, where practical, from different providers, voluntary sector organisations, service users, local authorities, NHS including CCGs and the Police, and
 - Members of the Children and Young People's Services Select Committee and the Chairman of the Corporate Parenting Panel should be invited to the next HASC meeting to help take into account any cross cutting issues.
- 1.4 In regard to the MIG, the HASC recommended that the County Council should seek evidence from service users who would be impacted by the proposals; highlighted the importance of advocacy for the groups subject to this consultation and asked that voluntary groups are included in the consultation to provide any additional information.

2. Proposal

2.1 The details for each of the proposed decisions to review the County Council's investment in housing related support contracts and the LAN and the County Council's agreed level of MIG are set out in the draft decision reports attached as item 6a, 6b and 6c.

3. Resources

3.1 Each of the draft Cabinet Member decision reports set out their resource implications.

Factors taken into account

4. Issues for consideration by the Select Committee

- 4.1 The HASC is asked consider the attached draft Cabinet Member decision reports, which have been informed by a period of engagement with stakeholders. Issues members may wish to explore include;
 - a) The effectiveness of the consultation/engagement process with stakeholders and service users,
 - b) What the consultation analysis tells us and how it should inform the decision-making process. How have responses differed (e.g. service users, service providers, district/borough councils),
 - c) The County Council's statutory responsibilities and those of partners and other agencies, and how these have informed the proposals,

- d) What impact assessment has been carried out and any planned mitigations, bearing in mind the Councils public sector equality duty and other responsibilities identified in the decision reports,
- e) Timetable for delivery of proposals,
- f) Plans to monitor the impact of the proposals to include service users, their families and carers and current service providers, and
- g) Plans for future partnership working with strategic partners

5. Consultation

- 5.1 Proposals have been published in the County Council's Forward Plan of Key Decisions and each of the draft Cabinet Member reports sets out the methodology and process of engagement with stakeholders and elected members.
- 6. Risk Management Implications/Other Options Considered/Equality Duty/Social Value/Crime Disorder Implications/Human Rights Implications
- 6.1 These sub headings are addressed in each of the individual draft Cabinet Member decision reports for housing relation support, Local Assistance Network (LAN) and Minimum Income Guarantee (MIG) for Working Age Adults.

Kim Curry

Dave Sargeant

Executive Director Children, Adults, Families, Health and Education

Interim Director of Adults' Services

Contact: Helena Cox, Senior Advisor, Democratic Services 0330 222 2533



Cabinet Member for Adults and Health	Ref No: AHxx (18/19)
December 2018	Key Decision: Yes
Housing Related Support	Part I
Report by Executive Director Children, Adults, Families, Health and Education and Interim Director of Adults' Services	Electoral Divisions: All

Summary

As part of the Council's budget proposals consideration has been given to aims and responsibilities underpinning the Councils' expenditure on Housing Related Support Services (HRS). These currently total £6.3 million per annum.

These services are delivered by multiple providers in a variety of forms across the County, the remit of which is to support individuals and families through services connected with their housing needs and provision and to support the prevention of homelessness.

Funding for HRS was originally provided through the ring fenced "Supporting People" grant from 2003. This was subject to annual reductions until 2011 when the ring fence was removed. Funding for these services is now met from the core County Council budget. Some of the procured services enable the Council to fulfil statutory responsibilities and others are discretionary in nature.

The Council has decided that it must consider options for changing or removing investment in HRS so as to focus funds on areas of greatest benefit in relation to defined responsibilities. This has been undertaken by opening consultation to consider the impact on individuals and families, service providers and local strategic relationships, and the practical, statutory and legal implications of any change. The evaluation of this impact is summarised in the report and provided in detail at Appendix one. On the basis of this analysis it is proposed that the Council implements a measured approach to these changes, retaining commitments to discharge statutory duties and support the wider prevention agenda.

For that purpose a budget of £2.3m is assessed as being appropriate. This will result in a spending reduction of £4m, which will be implemented over two financial years to enable time to remodel services and explore impact mitigation.

West Sussex Plan: Policy Impact and Context

The proposal for continued investment in Housing Related Support contributes to the West Sussex Plan objective for the Best Start in Life and contributes to the agendas of Independence for Later Life and a strong safe and sustainable place.

Financial Impact

This proposal will deliver a saving of £4million recurrently once fully implemented.

Recommendations

The Cabinet Member for Adults and Health is asked to approve that;

- (1) The County Council allocates a core budget of £4.6 million in 2019/20 and £2.3 million in 2020/21 for investment in Housing Related Support, this investment to be used to meet the Council's statutory duties and address the risk that reducing targeted prevention will lead to increased demand pressure in other areas,
- (2) All current Housing Related Support Contracts be terminated by 30th September 2019 and new contractual arrangements will be developed to commence on the 1st October 2019 and
- (3) The County Council works closely with strategic partners, providers and stakeholders to remodel the service offer in line with statutory responsibilities, revised service priorities and the financial envelope.

Proposal

1. Background and Context

- 1.1 The purpose of this report is to set out the context of the budget for HRS, outline the consultation responses, impact assessment and consideration of options, and to set out the rationale for the revised budget proposal
- 1.2 This report is accompanied by the consultation feedback and impact assessment (appendix one), a summary of the relevant statutory responsibilities (appendix two), a report on behalf of the districts and boroughs (appendix three), and a summary of the online survey findings (appendix four)

Housing Related Support

- 1.3 The purpose of HRS is to reduce the risk of tenancy breakdown and homelessness for individuals who, for a variety of reasons, may struggle to maintain independence without these inputs. Services are a mixture of 'accommodation based' that is support linked to specific properties, and 'floating' which can be provided to individuals in a variety of different accommodations, including accommodation they secure.
- 1.4 In West Sussex these services support the delivery of a range of statutory duties and discretionary responsibilities on behalf of the County Council and the District and Boroughs. The primary statutory responsibility for addressing or preventing homelessness falls to the districts and boroughs as housing authorities. Council social care responsibilities may be discharged through housing support and homelessness prevention services. These services also support the prevention of demand on other services.
- 1.5 Funding for these services was historically funded by central government through a range of sources. In 2003 a review of funding streams resulted in

- the creation of a 'Supporting People' Grant, a reducing ring fence grant which was administered by the Council. In 2011 the ring fence was removed.
- 1.6 These housing related support services are now funded from the Adults and Health budget as part of the County Council's base budget.

2. Proposal Details

- 2.1 The scope of the strategic budget options exercise, published in August, 2018 included a proposal to consider the option of withdrawing some or all of the investment in HRS. This was to allow the Council to examine how such services could be focused on the most critical and effective interventions and support aligned to the Council's priorities and core responsibilities. This would enable budget planning across the whole Council to be rationalised rather than be based on an assumption of continued provision or funding levels.
- 2.2 The first requirement was to explain the aims and scope of the proposal and to invite response and feedback from all stakeholders so that the impact of all options could be fully considered against the range of legal and statutory duties. There has been significant feedback and engagement in relation to this proposal. This has proved extremely helpful in understanding the impact of this proposal which includes;
 - Legal and practical considerations with relation to existing contractual relationships with providers,
 - Implications for those in need of services and support in relation to the Council's discharge of its statutory duties,
 - Implications for strategic partners, in particular the districts and boroughs in discharging their statutory duties and Health in terms of the impact on mental health and other health needs.
 - Implications for the potential impact on demand pressure in other parts of the system.

Contractual Considerations

- 2.3 The Council has recognised that its investment is currently tied up in existing contracts and that adequate time is needed to consider alternatives, to plan the changes to or withdrawal from contracts and the impact on those in receipt of services from these contracts. As such, the Council has agreed to extend all current contracts until September 2019, subject to agreement with the existing providers.
- 2.4 The period from January 2019 to August 2019 will be used to remodel and procure new contracts. New contracts will be issued in September 2019 to reflect the new investment levels and service priorities.

Statutory Considerations and the prevention agenda

2.5 The services support the delivery of statutory functions in relation to addressing and preventing homelessness. The primary responsibility for these services falls to district and borough councils as housing authorities. These councils also carry the duty to maintain a homelessness strategy (as explained in appendix 2). Duties to advise and support those at risk of

homelessness as well as those who present as homeless form the core of that set of duties. A summary of the housing authority and social care authority responsibilities is provided in appendix two. This sets out the complex set of overlapping and related responsibilities which need to be fully understood in terms of alignment and purpose in order to identify the aims of services provided through housing support service contracts. Their current connection with HRS services is set out in Part 2 of Appendix 2.

- 2.6 The Council has duties to meet the care needs of those adults considered eligible for care and support under the Care Act 2014. In addition, social care authorities have duties in relation to the promotion of wellbeing and the need to prevent, reduce and delay needs for care and support. In the implementation of plans based on service priorities an additional factor will be how housing related support services contribute to this prevention outcome. This is particularly the case where the potential removal of particular services may lead to an increase in demand for formal assessments and the need for the provision of more intensive support.
- 2.7 The Council has a range of social care responsibilities in relation to children and young people: to unaccompanied child asylum seekers, to children who are at risk of harm, to young people under 18 who may otherwise not have accommodation available to them as well as to young people leaving the care of the Council who were formerly looked after.
- 2.8 The Care Act 2014 and the Homelessness Prevention Act 2017 create reciprocal duties to co-operate in relation to prevention. This duties cover the County Council as well as the district and boroughs and NHS organisations.

Proposal

- 2.9 Recognising these implications, the Council is proposing to implement a measured approach to changes to its requirements and funding of these support services. This will result in a reduced Council funding offer. This reduction will be managed through a staged approach. The Council will support a partnership approach to reviewing the contracts and identifying the options available to minimise the impact on individuals within the system.
- 2.10 In reference to the request to delay all of the savings into 2020/21 the Council's view is that it is reasonable to identify those services which can be varied or withdrawn without significant adverse impact or which can be managed effectively through the required change with joint service planning. It is therefore proposed that some of the changes should be delivered within 2019/20. The Council will ensure that work is undertaken with providers and partners to ensure planning and transition arrangements mitigate any adverse impact of the proposals.
- 2.11 Work is required to develop an implementation plan however the significant milestones to ensure delivery can be seen in the table below.

Date	Action
December 2018	Cabinet Member Decision
By end of January 2019	Plan for prioritised contract renegotiation and

	timescale for review of all services
By end of March 2019	Notice given on existing contracts
January - August 2019	Remodelling of services and contracts
By end of September	2019/20 budget reductions implemented
2019	New / revised contracts issued

2.12 It is recognised that this is a challenging timescale and will require the cooperation of all partners, providers and stakeholders across the system. The level of engagement with the consultation process suggests that there is willingness for this engagement.

Factors taken into account

3 Consultation

3.1 A significant programme of consultation has been undertaken on this proposal. The feedback from the consultation is outlined above and can be seen in the attached impact assessment at appendix one. Analysis of the consultation themes can be seen at appendix four.

4 Financial (revenue and capital) and Resource Implications

- 4.1 The current budget for services provided through the housing related support contracts is £6.3million and supports services across the county. This is funded from the base Council budget rather than through any dedicated or general grant. Council wide pressures across the entire range of services means that all financial commitments have to be tested and challenged.
- 4.2 Opportunities to close the budget gap that the Council faces are limited due to the requirements to fulfil its statutory duties and demand pressure in children and adults services. The Council also recognises that districts and boroughs also face significant financial pressures and that it is unlikely that other parts of the system can simply plug the gap if this funding is removed.
- 4.3 It is proposed that the Council allocates a budget to meet its statutory obligations and contribute to the wider prevention agenda:
- 4.3.1 To meet statutory duties a commitment of £1m per year is considered necessary. This is based on a review of services currently considered as meeting or contributing to County Council statutory duties.
- 4.3.2 It is proposed that, in addition, the Council continues to invest up to up to £1.3m per annum in services which support the prevention agenda. Provision at that level will enable a continued contribution to commissioning for youth homelessness and services covering rough sleeping and domestic violence refuges, however it recognises that this may require providers to access alternative revenue streams or reduce the overall offer.
- 4.3.3 The contracts will continue in their current form until September 2019. The remodelled contracts will commence from September 2019 based

on the recurrent £2.3m financial envelope. £300k will be held as a contingency to provide some additional flexibility in year if this is required.

4.3.4 A breakdown of the investment for 2019/20 is in the table below:

	Current Year	Year 1	Year 2	Year 3
	2018/19	2019/20	2020/21	2021/22
	£m	£m	£m	£m
current spend	6.3	3.15	0	0
Spend on new	0	1.15	2.3	2.3
contracts				
Contingency	0	0.3	0	0
Total	6.3	4.6	2.3	2.3

- 4.3.5 The reductions will fall mainly within;
 - Homelessness prevention and resettlement, since responsibilities fall largely within the domain of the districts and boroughs,
 - Schemes for younger adults and young parents' schemes,
 - Older people's services (e.g. subsidies to social landlords to provide additional support to residents) where spending does not form part of a statutory duty, and
 - Offender schemes, responsibility for part of which is expected to be assumed by the National Probation Service
- 4.4 Officer capacity will be made available to work with the district and boroughs, providers, other partners and users of the services, to review the current arrangements and remodel the services to maximise the beneficial outcomes for those in need and to mitigate the impact on users of the services and those whose needs may need to be met through other routes.
- 4.5 Revenue consequences of proposal

	Current Year	Year 1	Year 2	Year 3
	2018/19	2019/20	2020/21	2021/22
	£m	£m	£m	£m
Revenue budget	6.3	4.6	2.3	2.3
Change from Proposal	0	1.7	2.3	2.3
Remaining budget	6.3	4.6	2.3	2.3

5 Legal Implications

5.1 A summary of statutory duties can be seen in appendix two. There is a complex set of overlapping statutory duties and associated powers, most usefully exercised to prevent or reduce the potential emergence of greater needs and their demands on other services. All of the duties considered together illustrate the need for cooperation and joint working across agencies

to identify a shared strategy and set of objectives and to reach a common set of aims and commissioning plans to meet them. The appendix also provides, for illustrative purposes the implications of current HRS arrangements for the various statutory functions.

6 Risk Assessment Implications and Mitigations

- 6.1 Reductions in funding create a risk that services will be forced to close leaving individuals and families who may require support unable to access this. The impact could be an increase in homelessness, or an increase in request for assessment and support from adult or children's social care. The proposed approach provides some stability by clearly profiling the financial constraints and allowing flexibility on how the changes are delivered.
- 6.2 There is a risk that services may become destabilised whilst the remodelling work is undertaken. This will be mitigated through early engagement and clarity of purpose amongst all the partner agencies. It is important that this is seen as a collective set of responsibilities where the beneficial outcomes for those in need in our community are shared and the need to maintain a coherent system of support and intervention is planned jointly within the financial constraints which exist.
- 6.3 There is a risk that, in remodelling these services insufficient additional resources can be identified across the system to fully meet the responsibilities shared by the agencies. Careful attention will be given to the impact of particular proposals for change and the need to adapt or modify those proposals as such impact and available mitigation are identified.
- 6.4 The timescale for remodelling the services is challenging. This situation will be kept under review during the implementation period.

7. Other Options Considered

- 7.1 In view of the scale of the financial challenge facing the Council, it cannot rule any areas out of consideration. Clarity of purpose and priority of outcome for all contractual arrangements must be achieved to make the most effective use of resources. To do nothing is therefore not an option
- 7.2 The option to withdraw the full Housing Related Support budget would not achieve the aims of ensuring these services meet the responsibilities of the County Council in a planned and measured way. This would have a significant impact across the County at both a strategic level and potentially on an individual level if services were to close with insufficient planning or impact assessment. Since it would also leave the Council at risk of not being able to fulfil some of its statutory responsibilities, this has never been treated as a viable option to pursue.
- 7.3 The option to retain a core element of investment linked to the delivery of statutory functions and supporting prevention with the remaining reductions staged in two parts is therefore the recommended option.

8 Equality and Human Rights Assessment

8.1 A detailed impact assessment has been designed and undertaken (described at appendix one). The work planned to develop future service priorities and how they can best be met will continue the approach which takes fully into account the Council's duty to have regard to its public sector equality duties.

9 Social Value and Sustainability Assessment

9.1 The proposal to jointly review and remodel the commissioned services will take into account the social value that these deliver for the people of West Sussex. The particular elements of the Council's Social Value Policy which have been considered or will be included in the implementation of the proposals are set out as part of the impact assessment in appendix one.

10 Crime and Disorder Implications

10.1 Several commissioned services contribute to the County Council's role in reducing crime and anti-social behaviour. Stakeholders from the criminal justice sector will be encouraged to participate in this process so that this is properly recognised. The relevant statutory duties are included in the summary of responsibilities provided in appendix two.

11 Human Rights Implications

11.1 A number of the Articles of the Convention on Human Rights are engaged by proposals to alter service support to those with needs linked to their accommodation and wellbeing. The rights enshrined in Article 8 (private family life and home) will be the focus of the impact assessment and future service plans together with other fundamental rights identified as relevant as the process of service redevelopment is implemented.

Kim Curry

Executive Director Children, Adults, Families, Health and Education

Dave Sargeant
Interim Director of Adult Social Care

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Appendices

- Appendix one: Consultation feedback and Equality Assessment
- Appendix two: Summary of legal duties and responsibilities
- Appendix three: Housing related support: A report on the impact of a reduction in financial support to housing related support contracts on West Sussex Housing Authorities.

• Appendix four: Housing Related Support Consultation themes

Background papers

Consultation responses from providers, stakeholders and partners





Appendix 1: Consultation feedback

Consultation process

The consultation process opened on 3rd October 2018 and closed on 3rd December 2018.

The consultation received nearly 800 responses, the majority of which were in response to the online survey. In summary this consultation raised concerns regarding the potential impact of changes on vulnerable individuals. This has been recognised within the proposal and will be considered alongside partners as the proposals are implemented. In relation to those with protected characteristics for the equality assessment it has identified a number of services which are specifically targeted at older people or those where a higher proportion of those with protected characteristics will be affected. The equality assessment has identified initial impact expectations and the future plans for joint working with stakeholders will ensure the continued understanding of such implications so that due regard can be given to them during implementation.

Key stakeholders, service providers, local authorities, elected members and members of the public were encouraged to participate through a number of different mediums that included;

- An on line survey via the West Sussex County Council website. All survey
 documents were made available in easy read formats and printable form
 that could be submitted in person or by post
- A dedicated e-mail address for representations
- Meetings with Officers and the County Council Cabinet Members for Adults and Children's Services respectively
- Market engagement events

Participation

- 15 service providers formed a Provider Coalition to develop a combined response to the budget proposals. The Coalition held five meetings which were attended by County Council lead officers for the consultation process and one by the Cabinet Member for Adults & Health.
- The West Sussex District & Borough Councils formed a task and finish group to present a combined response to the proposals
- 721 responses were received to the online survey questionnaire
- 8 paper copy responses were received to the proposals
- 41 e-mail responses were received by the dedicated e-mail address for the consultation
- 7 stakeholders attended market consultation events
- Meetings were held with all District & Borough Council Cabinet Members for Housing and Strategic Housing leads by the Cabinet Member for Adults & Health

- 10 service provider site visits and discussions were held by the Cabinet Member for Adults & Health
- 14 meetings were held with service providers and council officers facilitating the consultation process
- 13 service providers and stakeholders submitted responses.

Consultation responses

The responses and analysis of the online survey are contained in the report that can be accessed via the link:

- West Sussex Coalition of providers
- West Sussex District & Borough Councils combined response
- Turning Tides
- Peabody Housing Association
- Southdown Housing Association
- Sussex Partnership Foundation Trust
- Bognor Housing Trust
- Safe in Sussex
- Katy Bourne, Sussex Police & Crime Commissioner
- West Sussex Mental Health Commissioning Team
- Ifield Quaker Meeting
- Blue Idol Quaker Meeting
- RedAssure, Worthing Homes

IMPACT ASSESSMENTS:

1. Equality Duty

The County Council has a duty under Section 149 of the Equality Act 2010 ('the Act') to have due regard in the exercise of its functions to the need to:

Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act;

Advance equality of opportunity between persons who share a relevant protected characteristic (age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, gender and sexual orientation) and those who do not share it;

Foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Due regard in this context involves having due regard in particular to:

The need to remove or minimise disadvantages suffered by persons sharing a relevant characteristic connected to that characteristic;

Take steps to meet the needs of persons sharing a relevant protected

characteristics different from the needs of persons who do not share it;

Encourage persons sharing a relevant protected characteristics to participate in public life or in any other activity which participation by such persons is disproportionally low.

Equality Impact Assessment

The further assessment of equality impact (implications for duties owed to those with protected characteristics set out above) will be carried out throughout the next phase of work in setting service priorities, designing service levels and allocating funds to meet the identified outcomes. In addition to ensuring the service priorities work shows due regard to the equality duty careful consideration will also be given to the effects of changes to current arrangements and how they can be mitigated where those with protected characteristics are affected or disproportionately affected.

A full engagement and consultation exercise will be carried with partner organisations, service providers and service users as set out above.

2. Impact on Crime and Disorder:

2.1. The impact on crime and disorder is expected to be minimal, however, any specifically implications will be monitored with relevant partners as they arise during the process of service planning and implementation

Service area and description of proposal;

Adult Services – To work with District & Borough Council partners and Service providers to redesign Supported Accommodation services for people who are homeless or at risk of homelessness to release savings when the current contracts come to an end.

Impact of proposal

There will be engagement with District & Borough Council partners to review the future provision and investment in services for those people who are homeless or threatened with homelessness in the county.

The impact depends on the options selected after the engagement and level of joint investment . It is likely to impact on demand on existing statutory and non-statutory services, however the most vulnerable people affected have statutory services that can be accessed under the Homelessness Prevention Act 2017 and Care Act 2014

Service Provider impact

Name of	Type of Service	Brief	Current	Amount of units	Likely impact if	
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Provider		Description of service	Housing Support Funding	funded	Housing Support funding taken away
Crawley Homes	Floating support age.	Floating support to Crawley Homes tenants od retirement age.	£71,000	Variable, 150 people assisted in 2018 / 18	Provider owns the housing stock so any support would focus around housing / tenancy management instead of in depth individual support.
Bognor Housing Trust	Supported hostel type accommodation for homeless people in Arun.	Part of the service is categorised as direct access accommodation and some as move on. Access to the move on accommodation is via the direct access service. Hostel accommodation is deemed short term: up to 6 months. Move on is short to medium term: up to 12 months.	£105,811	25	Provider owns building so could possibly continue as very low level supported housing. *
CGL	Supported accommodation for High Risk Offenders in Adur, Arun, Chichester, Horsham and Worthing.	The service is for high risk offenders who find themselves homeless on release from prison. It provides intense support to customers in an accommodation based setting. The service is available to anyone with a West Sussex connection but only takes referrals from Probation Services. Short to medium term	£283,296	52	Provider owns 1 of the buildings so could possibly keep that one going. Would not be able to take high risk customers.

		service: up to 2 years.			
Crawley Open House	Supported hostel type accommodation for homeless people in Crawley	The service is for customers with housing support needs who are homeless. The provider also runs a 'hub' from the hostel building where homeless people can access support services during the day. Short term service: up to 3 months.	£262,075	24	Provider owns building and has some other relatively stable funding streams going in. Could continue to provide supported housing but at a lower level of need.
Guild Care	Sheltered accommodation	An enhanced sheltered warden assisted scheme for vulnerable older people	£10,000	32	Support services will be reduced to those that can be covered by service charges and enhanced housing benefit. Reduced capacity to take on people with higher levels of need and support.
Hanover	Extra care	An extra care supported housing scheme for older people	£30,000	85	Support services will be reduced to those that can be covered by service charges and enhanced housing benefit. Reduced capacity to take on people with higher levels of need and support.
Home Group	Phoenix Project - Supported accommodation for young people with complex needs	The service supports vulnerable young people in crisis because of enduring or acute mental	£205,913	15	Could possibly continue as very low level supported housing but likely to revert

	in Worthing.	health needs. The service provides high level, individualised support in a 24 hour staffed, community context. Short to medium term service: up to 2 years.			to general needs.
LIFE	Supported accommodation for young parents in Arun, Crawley, Mid Sussex and Worthing.	The service is for Teenage/Young mothers with housing support needs. As well as supported accommodation, LIFE also provides some limited short term pre/post tenancy support. Short to medium term service: up to 2 years.	£155,920	20	Provider owns none of the buildings. Depending on lease costs, maybe able to continue providing accommodation for teen parents with minimal support needs.
Peabody	Resettlement Service - Supported accommodation for vulnerable working age adults in Mid Sussex.	Support is delivered flexibly to a variety of customers in a variety of settings. Some of the support hours are delivered to those in a supported accommodation based setting. The remainder of the support hours are used to deliver floating support to vulnerable people in the community. Short to medium term service: up to 2 years	£215,096	34	Could possibly continue as very low level support service.
Peabody – Here To Help	Floating support for older people	Floating support for older people particularly in	£587,000	997 people assisted in 2018 /18	Could possibly continue as very low level

		Arun, Mid Sussex and Chichester. Tenure neutral, but mainly dealing with residents in the private sector			support service.
Places For People	Extra care	Contribution funding for a scheme manager at Leaholme that accommodates low care / high support residents	£16,000	39	Support services will be reduced to those that can be covered by service charges and enhanced housing benefit. Reduced capacity to take on people with higher levels of need and support.
Safe in Sussex	Women's Domestic Violence Refuges in Horsham and Worthing.	The service provides refuge accommodation and support for any woman and children fleeing domestic violence. Short term service: up to 6 months.	£99,514	13	Refuge service in Horsham is barely breaking even due to high lease costs from head landlord. Removal of support funding would undoubtedly mean that at least this part of the service would end.
Sanctuary	Young Person's services - Supported accommodation for homeless young people with support needs in Adur and Arun.	The services support and accommodate young people in the Adur and Arun areas. 2 bed spaces in are designated as Quick Access for homeless 16/17 year olds. Short to medium term service: up to 2 years.	£316,045	36	Provider owns all the properties within the service. Could possibly continue as very low level supported housing but likely to revert to general needs.
Sanctuary	Resettlement Service - Supported	The service is for vulnerable people with	£180,018	26	Provider owns the majority of properties

	accommodation for vulnerable working age adults in Arun.	mental health issues living in the Arun area. The majority of front line support hours are delivered to those accommodated in 13 of the units situated in 2 adjoining houses. The other 13 units are supported on an outreach basis. Short to medium term service: up to 2 years.			within the service. Could possibly continue as very low level supported housing but likely to revert to general needs.
Saxon Weald	Extra Care housing schemes	Contribution to accommodation based services for older persons some who may have Care Act needs	£80,000	318	Support services will be reduced to those that can be covered by service charges and enhanced housing benefit. Reduced capacity to take on people with higher levels of need and support.
Saxon Weald	Floating support	A floating support service for older tenants of Saxon Weald	£57,000	77 people assisted in 2017 / 18	Support services will be reduced to those that can be covered by service charges and enhanced housing benefit. Reduced capacity to take on people with higher levels of need and support.
Southdown	WSHPP - Floating support service dealing with homeless prevention across the	The service aims to prevent homelessness within 2 distinct cohorts: families with children who	£1,494,838	178 accommodation units plus annual throughput of 587 customers	Provider runs entire service on a floating support basis and as such, is almost totally

		maladak etter			
	county.	might otherwise be at risk of		for Co-located	reliant on
		being found		service and 345	Housing
		Intentionally		customers for	Support
		Homeless and		Acute	funding.
		single		Settings/General	Complicated
		vulnerable			sub-let
		adults who are		Needs Hospital	
		at risk of rough		discharge	arrangements
		sleeping. There		workers	are in place for
		are 6 areas of			the
		service delivery:			accommodation
		Co-location-			part of the
		where support			· .
		workers are			service, with
		embedded			vastly varying
		within Housing			lease costs and
		Options teams;			management
		Acute Settings			responsibilities.
		Discharge			Likely that the
		work - where			
		support workers are embedded			majority of the
		within Acute			service would
		Mental Health			cease.
		settings;			
		General Needs			
		Hospital			
		Discharge			
		work - where			
		the worker is			
		co-located			
		across 2 coastal			
		hospitals;			
		Supported			
		Housing -			
		where workers			
		support			
		vulnerable adults in their			
		own tenancies;			
		Myplace -			
		where workers			
		support			
		vulnerable			
		young people in			
		their own			
		tenancies;			
		Money			
		Management			
		Outreach			
		Work - where			
		workers support families with			
		high levels of			
		debt.			
		GODE.			
Stopopillous	Supported	The service is	£190,735	63	The provider
Stonepillow	hostel type	for customers	E130,/33	US	The provider
	accommodation	with housing			owns the core
	for homeless	support needs			buildings
	people in Arun	who are			associated with
	and Chichester.	homeless. The			the service so

		provider also runs a 'hub' in the Arun and Chichester areas where homeless people can access support services during the day. Short term. 5 units of accommodation are for those discharged from hospital requiring a period of convalescence and rehabilitation. Stonepillow also provide floating support for customers in a variety of settings. Short term service: up to 3 months.			could possibly continue providing supported accommodation at a much lower level. Most of the outreach properties are owned by other landlords so it is likely that these would be handed back. *
Turning Tides	Supported hostel type accommodation for homeless people in Worthing	The service operates 2 hostels in Worthing for homeless people. Referrals for these hostels come from the Worthing Pathway Panel. 15 of the bed spaces receive direct nominations from Adur and Worthing Councils and are used as temporary accommodation for single people that approach these Councils. There is also a range of move on accommodation which operates with a lower level of support. The provider also runs a 'hub' where homeless people can	£271,685	67	Provider owns 2 of the core buildings associated with the service and leases the other at a very low cost. Could possibly continue providing supported accommodation at a much lower level. *

		access support services during the day. Short term Hostel accommodation is deemed short term: up to 3 months. Move on is short to medium term: up to 2 years.			
YMCA DLG	Supported accommodation for homeless young people in Crawley, Horsham, Mid Sussex and Worthing.	The service supports and accommodates young people in 24 hour staffed accommodation at the Crawley Foyer, Horsham Y Centre and Worthing Foyer. Within these settings, 6 of the beds are designated as quick access for homeless 16/17 year olds. There is also a wide range of move on accommodation which is supported on an outreach basis. Short to medium term service: up to 2 years.	£883,152	173	Provider owns a large portfolio of property associated with the service. It is likely that some parts of the service would carry on accommodating and supporting young people. However, without additional funding, the profile of these young people would be very different from the current customer group and would necessarily have much lower needs.



Appendix 2

Part 1 summarises the relevant local authority duties and responsibilities

Part 2 references the relevant responsibilities to currently funded provision

Part 1 A summary of statutory provisions concerning homelessness and related local authority duties

Housing Authority duties: Housing Act 1996 In summary a housing authority's core responsibilities are

- (a) to provide interim accommodation (including pending review or appeal);
- (b) to prevent and relieve homelessness (including a power to provide accommodation);
- (c) to secure accommodation for applicants who are homeless, eligible for assistance, have priority need and are not intentionally homeless (the main housing duty).

Duty to provide interim accommodation

Housing authorities must secure that accommodation is available for an applicant if they have reason to believe that the applicant may be homeless, be eligible for assistance; and have a priority need, even where the applicant may not have a local connection. The duty ends when applicants are notified of certain decisions in relation to their application.

An applicant who the housing authority has found to be not in priority need within the 56 day 'relief stage' will no longer be owed an interim duty to accommodate, but will continue to be owed a relief duty until that duty ends or is found not to be owed. In circumstances where an applicant is found not to be eligible for assistance, the housing authority must provide, or secure the provision of, information and advice. If interim accommodation has been provided, notice periods should take account of the needs of the applicant and the time required for them to access assistance.

On reaching a decision that an applicant has priority need and is intentionally homeless, the housing authority must secure accommodation for a period of time that will provide a reasonable opportunity for them to find their own accommodation.

Discretionary powers to secure accommodation

Housing authorities have powers to secure accommodation for certain applicants who request a review of certain decisions on their case, and to certain applicants (where not disqualified) requesting accommodation pending determination of a court appeal.

Powers to secure accommodation to prevent or relieve homelessness

Housing authorities have duties to help prevent and relieve homelessness for eligible applicants who are threatened with becoming homeless within 56 days, or are homeless. The prevention duty requires authorities to take reasonable steps to help the applicant to secure that accommodation does not cease to be available to them, and the relief duty requires housing authorities to take reasonable steps to help the applicant to secure that suitable accommodation becomes available to them for at least 6 months. Housing authorities might use the power to deliver accommodation services for groups that are at higher risk of homelessness.

Duty to secure accommodation under the 'main housing duty'

Where an applicant is unintentionally homeless, eligible for assistance and has a priority need for accommodation, the housing authority has a duty under to secure that accommodation is available for their occupation ('the main housing duty'). The accommodation secured must be available for occupation by the applicant together with any other person who normally resides with them as a member of their family, or any other person who might reasonably be expected to reside with them.

Homelessness Reduction Act 2017

Every housing authority must carry out a homelessness review and formulate and publish a homelessness strategy based on that review. Housing authorities are required to publish a new homelessness strategy, based on the results of a homelessness review at least every five years (commencing of 1 April 2017). The review is an assessment by the local housing authority of the levels, and future levels, of homelessness and the activities which are carried out, or contribute, to:

- Preventing homelessness,
- Ensuring accommodation is available for people who are or may become homeless, and
- Providing support for people who are or may become homeless, or who need support to prevent them becoming homeless again.

The review needs to take account of the resources available to the housing authority, the social services authority, other public authorities, voluntary organisations and any other people who carry out or contribute to these activities.

Housing authorities are encouraged to involve all relevant partners in developing a strategy that involves them in earlier identification and intervention to prevent homelessness. Housing authorities should ensure that it is consistent with other local plans and is developed with, and has the support of, all relevant local authority departments and partners. An area-wide joint approach is important in non-unitary areas, where housing and homelessness services are provided by the district authority whilst other key services, such as social services, are delivered at the county level. Each local authority has a duty under the Health and Social Care Act 2012 to take such steps as it considers appropriate for

improving the health of the people in its area. This includes people experiencing homelessness or at risk of homelessness. Housing authorities should ensure that their homelessness strategy is co-ordinated with the Health and Wellbeing Strategy, and that their review of homelessness informs and is informed by the Joint Strategic Needs Assessment.

Housing authorities must consult public or local authorities, voluntary organisations or other persons as they consider appropriate before adopting or modifying a homelessness strategy. Housing authorities will also wish to consult with service users and specialist agencies that provide support to homeless people in the district. Section 3(4) provides that a housing authority cannot include in a homelessness strategy any specific action expected to be taken by another body or organisation without their approval.

Where the social services authority and the housing authority are different authorities, the Act requires the social services authority to give the housing authority such assistance as may be reasonably required in carrying out a homelessness review and formulating and publishing a homelessness strategy.

Social Care Responsibilities

Adults

The Care Act 2014 requires local social care authorities to provide or arrange services that help prevent people from developing needs for care and support or delay people deteriorating such that they would need on-going care and support. The Care Act responsibilities commence with a duty to assess. The needs assessments will include the assessment of a need for residential care as well as home care or other support services which may be identified to prevent a need for residential care arising.

The core duty requires the assessment of potential care and support needs against eligibility criteria and the settling of a care plan which defines the services that should be available or procured to meet the eligible needs. These may include various support services to meet specific needs that enable continued independence in the individual's home.

A duty to refer under the Homelessness Prevention Act arises and may be used to enable social care authorities to fulfil their requirements under the Care Act, as an early referral is likely to result in an individual receiving help to prevent or relieve their housing situation at an earlier point. In many cases this action will prevent them from reaching a homelessness crisis in the first place or provide quick relief where individuals are already homeless to prevent prolonged homelessness.

Children - Duties and powers towards a young persons or care leavers

The County Council as the Children's Services Authority has responsibilities owed to young people and care leavers. Depending on the particular circumstances, young people aged under 18 (and homeless families with dependent children) may be eligible for assistance from both the Social Services authority and/or the Housing Authority.

Priority need for accommodation is given by the Housing Authority to those aged 16 or 17 except for those who are:

- Relevant children (defined in the Children Act 1989).
- Children in need who are owed a duty under section 20 of the CA 1989.

If a Local Housing Authority is uncertain as to whether the child is a relevant child, or one to whom a section 20 duty is owed, it should make inquiries of the children's services authority. The Local Housing Authority may provide interim accommodation while the children's services authority makes its decision.

Relevant child (16 or 17)

A relevant child is a child who is aged 16 or 17, has been in care for a qualifying period and is not currently being looked after. They should be provided with, or maintained in, suitable accommodation unless the local authority is satisfied that their welfare does not require it. The Local Authority that last looked after the relevant child has the duty.

Former relevant children (18 or over)

Defined as a young person who is aged 18 or above, and either has been a relevant child and would be one if he were under 18, or meets other specific criteria. The local authority that last looked after the young person must make various support services available through a pathway plan including expenses related to living near the place where he is, or will be, employed or seeking employment. The duties continue until the young person reaches 21 or, to the end of full time education or training.

For young people who pursue a programme of education or training there is a continuing duty (up to age 25) to provide assistance by way of advice and pathway planning and necessary financial support.

Child in Need (all ages)

It is the general duty of every children's authority;

- a. to safeguard and promote the welfare of children within their area who are in need
- b. to promote the upbringing of such children by their families

Section 20(1) requires that every local authority shall provide accommodation for any child in need within their area who appears to them to require accommodation as a result of -

- a. there being no person who has parental responsibility for them;
- b. their being lost or having been abandoned; or
- c. the person who has been caring for them is prevented from providing them with suitable accommodation or care.

In addition every local authority shall provide accommodation for any child in need within their area who has reached the age of sixteen and whose welfare the authority consider is likely to be seriously prejudiced if they do not provide them with accommodation. Whilst accommodated under section 20 the young person will not be eligible for welfare benefits, including housing benefits or housing costs under universal credit. Children's services will have a duty to maintain them, including meeting the cost of accommodation. Where a 16 or 17 year old is owed duties under section 20 of the 1989 Act, this takes precedence over the duties in the 1996 Housing Act in providing for children in need who require accommodation. These rules also apply to asylum seekers.

In any case, where a housing authority provides accommodation for a child in need, including where the young person has declined to be accommodated under section 20, children's services will need to consider the provision of services under section 17 of the 1989 Act, set out in a child in need plan, and continue to work with housing services to ensure the young person's needs are met.

Part 2: Housing Related Supported Services: relevant statutory duties and

Service	Social Care	Housing	Impact of
Supported Housing for Young People (16-25):	 Accommodation duty for 16 & 17 year olds who are homeless Support to care leavers using 'My Place' scheme 	Accommodation duty to 18- 25 year olds who have a 'priority need' and not meeting Children Act criteria.	change/prevention 16 & 17 year olds in need of placements Increased use of temporary accommodation. Risk many deemed intentionally homeless.
Housing Related Support for Young Parents	None (unless providing for a child in need)	Residents are owed an accommodation duty.	some mothers might require a specialist mother & baby placement (Social Care) Use of TA/Rehousing (Housing)
Support in Homelessness Hostels:	Only where qualify as young person through Children Act criteria.	 Less likely to be owed a substantive rehousing duty unless priority need and not intentionally homeless Hostel accommodation avoids need for temporary accommodation pending a homelessness decision. 	Possible increase in requests for formal Care Act assessments and provision of services Some service users likely to be owed a temporary duty but deemed to be intentionally homeless and not owed a long term duty.
Domestic Violence Refuge:	Child in need or at risk of harm (s.17 or s.47 investigation)	Accommodation duty owed to households homeless as a result of domestic violence	Social care – services to support children in need Housing: temporary and likely permanent housing.

MAPPA scheme for

Offenders: Scheme

accommodates life

released on licence

Arun and Mid Sussex

prisoners being

None unless requiring Care Act

• Nominations to these schemes

are exercised by the National

assessment

Probation Service

Co-located workers	• None	roles support duty to prevent homelessness	Social care – risks where children in need within families found intentionally homeless (around 10% of homeless families who apply for housing). Housing: Increasing use and cost of TA as well as a duty to provide permanent housing.
Resettlement Services	• None	These roles support duty to prevent homelessness	Social care: Sustaining accommodation for vulnerable adults who may develop a need for care services Housing: reduced dependence on TA
NHS facing services	Care Act duty to cooperate for timely discharge from hospital where assessed for care support.	 Services may cover needs to accommodate NHS patients who meet temporary or priority need on discharge. 	Social Care: Increase in assessments for social care intervention. Housing: potential increase in unplanned/chaotic homelessness applications

Services Provided under the West Sussex Homelessness Prevention Partnership and Resettlement Schemes in

None unless qualifying as

priority need

Impact requires consideration

jointly with probation service

Social Care: potential

(Floating Support)	 Services may identify persons who have Care Act Needs Support managing housing risks to current social care service users 	prevention of homelessness or signposting to appropriate housing options	increase in adults requiring long term care as a result of breakdown in housing/independence Housing: potential increase in unplanned/chaotic homelessness applications
Older Persons Accommodation Based	Additional support to Care Act eligible residents	• None	Social Care: potential reduction in ability of providers to accept residents with higher support (as opposed to care) needs

Limited, may assist in the

• Services may identify persons

Older Persons

Health & Adult Social Care Select Committee

Housing related support

A report on the impact of a reduction in the contracts on West Sussex Housing Authorities



By Nigel Lynn, CEO Arun District Council with the support of the District & Borough Strategic Housing Officers Group November 2018















Item 6a Appendix 3 Recommendations

The Health and Adult Social Care Committee (HASC) meeting of 27 September 2018 agreed to engage with partners as part of the decision making process in relation to Housing Related Support Contracts to be determined on 10 December 2018. Furthermore, at a West Sussex County Council (WSCC) Full Council meeting on 19 October 2018, a decision was made to extend the commissioned contracts until September 2019 while a review is carried out. West Sussex County Council are conducting consultation to the proposals (by 3 December 2018). It was agreed at the West Sussex Leaders Board meeting on 23 November 2018 that the following proposals be put forward by the District and Borough Leaders;

- a) An extension of the current commissioned services of up to 12 months be agreed through to March 2020 to provide an opportunity for further collaboration, engagement and assessment of the impacts on the local communities of all the budgetary proposals, including the Local Assistance Network (LAN) budget.
- b) The Social Care Authority (WSCC) identify and engage with other stakeholders that could have a positive impact on housing support.
- c) A task and finish group will be set up with representatives from the Social Care Authority and each of the Housing Authorities (Districts and Boroughs) to look at how we seek joint efficiencies, remodel provision and identify what alternative funding streams could be made available, including from other agencies. [Resourcing for undertaking the work has been agreed by Districts & Boroughs and Terms of Reference will be agreed shortly].
- d) The Social Care Authority considers, with the Housing Authorities, the overlapping geography that occurs to determine any efficiencies across areas of West Sussex, rather than solely Housing Authority boundaries.
- e) The Social Care Authority should provide detail of the impact these proposed cuts will have on their own internal budgets, particularly in relation to Adult Social Care and Children's Services statutory obligations, and how they intend to discharge those duties in the absence of supported housing funding to local providers.
- f) Housing Authorities also request sight of the risk assessment and equalities impact assessment with regard to the impacts of the proposals on Housing Authorities, other statutory bodies and service users.

1. Summary

- 1.1 At the West Sussex Leaders and Chief Executive's meeting held on 10 September 2018, all present agreed the following actions in relation to the proposed removal of funding for housing related support contracts:
 - All West Sussex Local Authorities to work together to review total spend on homelessness (including police and NHS) and identify savings that can be delivered through collaboration. Work will need to be implemented by April 2019. This work will:
 - Analyse the needs and demand of the client groups currently supported in existing accommodation services

- o Provide clarity about which Local Authority is discharging which statutory Appendix 3 responsibility and where discretionary spend is currently incurred;
- Identify what monies and funding streams are currently in the wider homelessness and prevention system; and
- Work with local authorities and providers to analyse what efficiencies and savings can be identified in existing provision and what alternative provisions and funding within the whole system there are to shape new models of services reflecting the reduced resources available particularly in relation to the County Council. Action: Nigel Lynn, as Lead Chief Executive via the Strategic Housing Partnership
- 1.2 Subsequently, at the West Sussex Leaders Board meeting on 23 November 2018, District and Borough Leaders agreed to the recommendations of this report as their response to the WSCC call for engagement.
- 1.3 There is no doubt that the complete removal of these housing support contracts will have a dramatic negative effect on individuals in our West Sussex communities. There will also be a knock on effect to Housing Authority revenue budgets as well as that of the Social Care Authority, as a result of proposed cuts in services. Strategic housing officers have expressed a willingness to work with the Social Care Authority to fully understand the repercussions and to remodel more efficient commissioned services for the future. The Social Care Authority will want to know when savings can be achieved. There will, therefore, be a need to consider how the Housing Authorities can assist the Social Care Authority with this in a reasonable timeframe.
- 1.4 Whilst there may be a concern (from some Housing Authorities) that working with the Social Care Authority may, inadvertently, shift the problems to the Housing Authorities, it is in all Councils interests to try and maintain housing support, whilst recognising that the system needs to be more efficient.
- 1.5 However, to enable this, additional funding is required, to create capacity within Housing Authorities (2 FTE's to work across West Sussex?). Furthermore, more time is required for a thorough piece of work that will stand the test of time.
- 1.6 Whilst a decision has not been made, it is imperative that the Social Care Authority evaluate and divulge their impact under their statutory duties as well as their risk/EIA assessments, to the Housing Authorities to provide a better insight for the proposed task and finish group.

2. Background

2.1 Strategic budget options were published in the West Sussex County Council Forward Plan of Key Decisions on 27 August 2018. The proposals reflect the current financial challenges faced by the Social Care Authority and are part of the budget process for 2019/20. However, an earlier report from the WSCC Executive Director of Children, Adults, Families, Health & Education in April 2018 'Commissioning Supported Housing: Renewal and Extension of existing contracts' considered social care budgets and made proposals to make changes, but to mitigate impacts on those most vulnerable. The report also recognised the Social Care Authority's role in the prevention agenda and reducing costs to Children and Adult Social care services. In this same report, the Social Care Authority make reference to the rationale for

- Item <u>Continuing to fund these services</u> because the Social Care Authority understand the value of the preventative services they provide: by helping vulnerable people to remain independent, avoid homelessness and minimise the impact on more intensive, higher cost services. Costs which the Social Care Authority are partly responsible for.
- 2.2 The proposals in the Health and Adult Social Care Committee (HASC) report (27 September 2018) included the review of the Social Care Authoritiy's investment in housing related support contracts and the Local Assistance Network (LAN).
- 2.3 The Social Care Authority commissions a range of housing related support services through contracts with independent sector organisations. These services range from specialist accommodation based schemes for residents who are at risk of homelessness, to 'floating support' for residents living in community settings. Housing related support may be provided either in an accommodation-based setting, such as a hostel, shared houses or refuges or alternatively in a community setting through 'floating support' where residents live independently in their own home.
- 2.4 The current arrangements for funding housing related support reflect an historical legacy of welfare reforms, which involved shifting costs provided by the then Housing Corporation and other government agencies such as, Probation and those contained within the benefit system to local government. Specifically, the Social Care Authority's role was defined by the creation of the then Supporting People Programme in 2003. This programme brought a number of revenue funding streams from various agencies together into a single "pot" to provide support for vulnerable people to help them live independently in the community.
- 2.5 Supporting People funding continued to be provided in this way, with the Social Care Authority acting as 'administering authority', until 2011 when specific funding for this purpose was abolished. The removal of the ring-fenced grant has had a gradually increasing impact across the country, with serious implications for the recipients.
- 2.6 The Social Care Authority currently spends £6.3m p.a. on commissioning housing related support services for people who are vulnerable or at risk of homelessness. Since 2010 £3m savings have already been delivered from this budget. The current overall Social Care Authority breakdown on spend on housing support is provided in the table below:

Client group	Stakeholders impacted	Spend £m p.a
Older people	Adult Social Care and NHS	0.9
West Sussex Homelessness	Adult and Children, Housing	1.8
Prevention Partnership	Authorities	
Accommodation based	Social Care Authority, NHS,	1.7
services for homeless adults	Police and Housing	
	Authorities	
Young People (16-25)	Children's Services and	1.9
	Housing Authorities	
Total Housing Support		6.3

2.7 The Social Care Authority currently spends £0.807m providing discretionary assistance to households in crisis situations through the Local Assistance Network (LAN). The LAN is delivered through a partnership with voluntary sector agencies which provide non cash based assistance, very largely on an 'in kind' basis, to

households facing hardship as a result of a crisis or emergency, including the foodbanks. As part of the proposals, the Social Care Authority are also considering whether to agree to the further reduction of LAN funding to a total of £200,000 per annum from April 2019 creating an annual saving of £0.607m.

- 2.8 The Health and Adult Social Care Committee (HASC) met on 27 September 2018 to consider housing support contracts. The Committee resolved that:
 - All service users likely to be impacted by these proposals have the opportunity to be consulted
 - ii. Members of the Committee have the opportunity to take evidence prior to, and at the next meeting of the Committee, where practical, from different providers, the voluntary sector, service users, local authorities, the NHS and police
 - iii. The next meeting of the Committee include the Children & Young People's Services Select Committee and the Chairman of the Corporate Parenting Panel to take into account any cross-cutting issues
 - iv. The next meeting of the Committee's Business Planning Group to discuss and finalise the arrangements for the Committee's evidence gathering prior to consideration of any final proposals taking into account the Committee's discussion on 27 September
- 2.9 The HASC report states that the Social Care Authority has continued to commission services on housing related support services since the demise of the Supporting People (ring-fenced) grant in 2011. Furthermore, these services provide support to vulnerable people whose lives are complex and chaotic. So, whilst the Social Care Authority contributes significant levels of funding to housing related support, the report states that it is the Housing Authorities who own the principal statutory role in preventing and responding to homelessness.
- 2.10 In accordance with the Housing Act (1996), the Housing Authorities have a statutory responsibility to take applications for assistance from homeless people. The Act requires Housing Authorities to carry out an assessment of homeless people to establish whether a duty is owed to house them. If the household is vulnerable ie. they have a health or social care need or have children (and they have not made themselves homeless intentionally) the Housing Authority has a duty to assist them with housing. In the case of vulnerable people the duty is to work with other service providers (health and social care) to ensure the accommodation is suitable and appropriate to meet their needs. In the case of many vulnerable households this would not be possible without a package of care and/or support.
- 2.11 In accordance with the Care Act (2014), Social Care Authorities have a statutory duty to assess the care needs of vulnerable people. Often the support provided assists people to remain in their homes and provide an important role in maintaining tenancies and preventing homeless. Without this support, a revolving door of homeless can occur, which is costly for all tiers of local government. In the case of the Social Care Authority, this support has often been provided by the services commissioned from the £6.3m supported housing fund. As referenced earlier, in April 2018 the Social Care Authority recognised that the key value in this work was preventative and helped enable vulnerable people to live independently, thus avoiding dependency on more intensive and high cost services elsewhere in the health and social care sector.

- 2!tem fee situation is even more complex in the case of families who have been found to be intentionally homeless. This means the Housing Authorities do not have a duty to assist the family beyond a limited time in temporary accommodation, usually bed and breakfast. Where these families have children, the children could be considered to be 'Children In Need' (Children's Act 1989) and, therefore, the responsibility of children's services i.e. the Social Care Authority, even when their only need is for housing.
- 2.13 In April 2018, the government placed additional responsibilities on the Housing Authorities via the Homelessness Reduction Act, which places a duty to provide assistance to all homeless persons.
- 2.14 The Homelessness Reduction Act (2017) was implemented in April 2018 and is the most significant and comprehensive change to homelessness legislation since the Homeless Persons Act (1977). It sets new duties for local Housing Authorities to provide advice and assistance to all households who are already homeless, or are threatened with homelessness within 56 days (as compared to the previous 28 days), irrespective of their priority need status.
- 2.15 The Homelessness Reduction Act places a new duty on all Councils to undertake an assessment of the housing and support needs with every client who is homeless or threatened with homelessness, and to provide them with a Personalised Housing Plan (PHP) setting out the planned actions that will be undertaken by both the client and the Council to address these issues. The Act identifies statutory roles and responsibilities and the relationship between the Housing Authority and the Social Care Authority.
- 2.16 The early experience of Housing Authorities in reducing homelessness has been broadly positive, with many reporting that the longer 56 day period has allowed them to identify potential homelessness at an earlier stage. This has allowed Housing Authorities to respond proactively with preventative action as opposed to a reactive resolution. However, early indications are also that Housing Authorities are experiencing increased numbers of people presenting themselves as homeless. There are also more people in Temporary Accommodation, and for longer. Although some government funding has been made available (through the New Burdens Fund), this has been woefully inadequate. The New Burdens funding is insufficient to sustain the work required to fully implement the Homelessness Reduction Act, with only one in five districts feeling that the current level of funding is sufficient to ensure that Councils are properly funded to tackle homelessness. This imbalance between need and funding has put a significant impact on local housing teams and their partners.
- 2.17 A survey of District Council Network (DCN) members, demonstrated that over two thirds of District Councils have seen an increase in the visible signs of homelessness in their areas, with just over half of District Councils also reporting an increase in the numbers approaching them for advice.
- 2.18 Whilst demand increases, there remains a lack of affordable and social housing availability, and the costs of Private Rented Sector (PRS) properties are unrealistic for those most at need.
- 2.19 Clearly, there are also implications for the Social Care Authority's budgets. When there are statutory responsibilities, the Social Care Authority will not be able to benefit from the supported housing budget.

- 2.20 Whilst Housing Authorities are primarily the local 'Housing Authorities' with the lion share of statutory functions, there are statutory responsibilities the Social Care Authority have where the provision of supported housing would enable them to discharge their own duties. Paragraphs 2.11 and 2.12 of this report identify Housing Authority responsibilities. The list below provides an indication of Social Care Authority responsibilities:
 - Accommodation duty for 16 and 17 year olds (Southwark ruling)
 - Accommodation for care leavers up to the age of 18 and, if in further accommodation, up to the age of 25 (Corporate parenting)
 - Young parents' accommodation for 18-25 year olds who are at risk
 - Children Act (1989) Section 20, duty to provide a child with somewhere to live because that child doesn't currently have either a home or a safe home
 - Children Act (1989) Section 17, duty to provide accommodation to protect a child where there is a safeguarding issue
 - Care Act Sections 18 & 19, duty to assess and, as required, meet care and support needs which would include the need for accommodation where this does not form a statutory duty for Housing Authorities under the Housing Act 1996 – e.g. where the person has no recourse to public funds
 - Accommodation duty for vulnerable adults with no capacity which would also include adults with learning disabilities
 - In cases of bed blocking where specialist accommodation or support needs are
 preventing discharge, the Adult Social Care service would be responsible for
 covering the cost of the bed blocking and would therefore be expected to be
 actively engaged in brokering appropriate move-on accommodation.
 - Government Rough Sleeping Strategy seeking to halve rough sleeping by 2022 and end it by 2027.
 - Recent letter to all Leaders from James Brokenshire MP (Secretary of State for Housing, Communities and Local Government) requesting that terminally ill homeless people are provided with accommodation. This has resulted in a change to the Homelessness Code of Guidance from 1st November 2018. Many of these are vulnerable adults with costs falling to health and social care in providing palliative care.
 - Crime & Disorder Act (Section 17), falls to both the Social Care Authority and Housing Authorities and a duty to reduce crime and antisocial behaviour and reoffending,
 - Domestic violence- Women's refuges and domestic abuse
 - Substance misuse (alcohol & drugs)
 - Public health requirements and avoidance of non-elective care (A&E)
 - Maintaining independence living at home and reducing pressure on expensive residential services/care settings
 - West Sussex Plan (2017-2022) best start in life for children and young people, a strong, safe and sustainable place for communities and a council that works for communities
 - Human rights Article 8
- 2.21 It will be important, moving forward, to fully understand all Authority statutory responsibilities, so that we are clear where the accountability and expenditure actually resides for the future. This assessment will help us all to identify both gaps in services to clients and inefficiencies in the overall system. As a result of the Homelessness

Item Reduction Act (2017), Housing Authorities are required to produce updated strategies to reduce homelessness. Understanding the whole picture more fully will help Housing Authorities with this piece of work. A countywide strategy, with individual Housing Authority parts, would be useful and this could be achieved within the next 12 months. The task and finish group, incorporating housing strategy officers, should be tasked with creating a strategy for dealing with homelessness across the whole county.

3. Current spend

3.1 The Social Care Authority spend on supported housing contracts (floating and/or accommodation based) broken down by Housing Authority:

	Young people	Prevention	Older adults	Total spend
Adur and Worthing	£639,275	£975,052	£178,482	£1,792,809
Arun	£114,169	£493,848	£301,115	£909,132
Chichester	£67,525	£441,565	£113,728	£622,818
Crawley	£335,377	£525,742	£92,750	£953,869
Horsham	£280,172	£268,417	£151,662	£700,251
Mid Sussex	£36,118	£294,051	£133,379	£463,548
Total spend by				
service	*£1,472,636	£2,998,675	£971,116	£5,442,427
Youth Homelessness				
Prevention Team				
Social Care Authority				
employees				£170,000
Floating preventative				
support – countywide				
demand led				£574,673
Current underspend		·	<u> </u>	£140,000
TOTAL				£6,327,100

- 3.2 The Housing Authorities use a combination of revenue funding (grants), Discretionary Housing Payments, New Burdens Funding, Flexible Homelessness Support Grant and Rough Sleeping initiatives funding. They provide in the region of £3.12m pa to support people in their homes and to prevent and relieve homelessness.
- 3.3 All of the current Housing Authority funding streams are fully committed and the Housing Authorities are spending considerable extra sums of money from their General Revenue Funds to meet statutory duties, both to prevent homelessness and specifically to relieve homelessness by placing individuals and families in temporary accommodation. In 2017/18, the temporary accommodation spend across Housing Authorities and the Social Care Authority was in the region of £5.6m.
- 3.4 Commissioned housing related support services:

Commissioned		
Housing Related		£

		_	- Hom 60 A
Support Services			Item 6a A
	Safe in Sussex	Women's Refuge*	99,514
Hostels & refuges	Bognor Housing Trust	Bognor Hostel	105,811
	Crawley Open House	Direct Access	262,075
	Stone Pillow	Chichester & Arun service	190,735
	Worthing Churches	Homelessness service	269,000
	Home Group	Ex Offender short stay	240,043
	CGL	MAPPA/ high risk offenders	283,293
Older People	Worthing Homes	Floating Support	120,000
	Crawley Homes	Floating Support	71,000
	Guild Care	Dolphin Court	10,000
	Hanover	Extra Care Housing	30,000
	Peabody, South East	Here to Help	587,518
	Places for People	Leaholme - extra care	15,600
	Saxon Weald	Floating Support	57,000
	Saxon Weald	Extra Care Housing	80,000
Homelessness Prevention	Southdown	Countywide Prevention Partnership	1,420,000
	Peabody South East	Mid Sussex Resettlement	215,000
	Sanctuary	Arun Resettlement	180,000
Young People	Life housing	Young Parents	
	Sanctuary	Youth homelessness	23,685
	Sanctuary	Supported Housing	292,360
	Southdown	Myplace - Care Leavers	125,000
	Home Group	High support/Mental Health	205,913
	YMCA Downslink	Foyers & Youth homelessness	883,152 5,766,699

Note: This list may not be exhaustive and does not include the physical number of houses provided by Housing Authorities and Registered Social Landlords (RSL's).

3.5 **Annex A** to this report provides detailed responses from all West Sussex Housing Authority Strategic Housing Officers. A detailed analysis of these responses by the task and finish group would help provide a better understanding of how clients are

- Item financially supported by various agencies and authorities. This report attempts to assimilate these various responses and focus in on a pragmatic and collaborative way forward.
- 3.6 What is clear from the comments from the Strategic Housing Officers Group is how, in real terms, external revenue funding has reduced for Housing Authorities to support their housing functions because the 'New Burdens' funding has proved to be inadequate for the additional duties, and the growing additional demand. Whilst the Flexible Homelessness Support grant has technically left no Housing Authority worse off, even with New Burdens funding, the budget is insufficient and has increased Housing Authority costs. This has occurred at a time when there are significant increases in demand. This increase in demand is more acute in deprived areas of West Sussex than any part of West Sussex and is the result of a number of factors including:
 - a. Welfare Reform;
 - b. Changes in taxation rules (Landlords);
 - c. Impact of low incomes vs high land/property values:
 - d. Competition in the rental market; and
 - e. The Homelessness Reduction Act
- 3.7 For information, the two most frequently cited reasons as to why people have found themselves homeless across West Sussex is firstly, parent(s) no longer willing to accommodate them (parental evictions) and the loss of their Assured Shorthold tenancy.
- 3.8 **Annex B** provides an overview of the Homelessness Reduction Act (2018) and the Government's Rough Sleeping Strategy (August 2018).

4. <u>Impact</u>

- 4.1 The Strategic Housing Officers Group met on 22 October 2018 to discuss the impact of the Social Care Authority budget proposals. Housing Officers have stated that the reduction in services would present a huge gap in capacity for Housing Authorities in terms of their ability to provide housing and support to the most vulnerable in our communities. Officers also agreed that the loss of the LAN would also have a significant impact. Shortly after this meeting, an email from WSCC's Commissioning Manager confirmed that "the LAN is likely to be reduced to £200k next year" (25 October 2018).
- 4.2 Housing Officers do not believe that using the Flexible Homeless Support Grant and the New Burdens Funding is an option to cover funding gaps, given the funding is already committed.
- 4.3 However, Strategic Housing Officers do believe there is the potential to ease savings out of existing contracts without an impact on the end user. They suggest that some services could be improved dramatically as the current commissioned services are poorly specified and inconsistent across the County. They suggest that some services are not measured or managed in any effective way. Officers have raised this on a number of occasions with the Social Care Authority's team and they are frustrated that an opportunity appears to have been lost to improve and streamline contracts with

minimal impact on clients. Strategic Housing Officers also felt that there was a fack of endix 3 transparency around how the services are being managed. For example, providers are often cross-subsidising their services between different Housing Authorities in order to manage their cashflow and their contracts. A more transparent approach to how the contracts are being managed might help in terms of understanding the needs and ensuring value for money and efficiencies.

- 4.4 Housing Officers also indicated that they were not aware of whether the commissioned housing providers were taking advantage of Enhanced Housing Benefit or Intensive Housing Management Support which would dramatically improve their income streams. It was felt that this was something that should be discussed with the countywide Housing Benefits Officer Group.
- 4.5 Any reductions in the levels of supported housing for Housing Authority clients would have an impact on these individuals, their families, and the Councils' ability to discharge their duties. In addition to the Social Care Authority discharging their statutory duties to children and vulnerable adults, failure to provide such supported accommodation and to rely upon temporary and emergency accommodation not only places a significant financial burden on councils, but the reality is that there are very few suitable local options for such placements. Poorer outcomes, particularly for families and children in temporary accommodation, has been well documented and evidenced nationally.
- 4.6 The proposed savings through cuts to front-line preventative services could be counterproductive. The WSCC April 2018 report recognises this. While they will help to achieve short-term savings targets, the long term impact of a reduced service may be more costly. Besides the impact on individuals, the savings generated need to be considered alongside the prevention of crime, anti-social behaviour, insolvency and hospitalisation against the benefit of addressing immediate budgetary concerns.
- 4.7 Housing Authorities do have some financial capacity to support capital projects that expand the provision for those in need of housing, but do not have the capacity to increase revenue spend given the significant financial pressures they too are being placed under. It is worth noting that those areas where housing is most difficult (often through deprivation) will be impacted more by the Social Care Authority's proposals, creating greater injustice to those most in need.
- 4.8 On 5 October 2018, WSCC promoted "Your Voice the Peoples Panel", inviting key stakeholders to have their say. The consultation will close on 3 December 2018. This report could be by Districts and Boroughs as a response to this consultation.

5. Overall evaluation of the analysis

- 5.1 The analysis demonstrates some key points:
 - There is a lack of transparency relating to outcomes from the data, as well as a lack of clarity about the effectiveness of how current contracts have been managed.
 - There is a need to understand accountability and expenditure across the whole County area. This would help us better understand the provider relationships and where there might be duplication, overlap or inefficiencies.

Item 6a Appendix 3 review of the contracts and commissioning is needed in order to take forward a plan to commission services for the future in a more efficient way.

- Housing Authorities have a significant number of placements of people who do
 not originate from their areas and this places additional burdens on Councils that
 have seen the highest rise in rough sleeping and a sharp increase in
 homelessness presentations over the last two years.
- Beyond the financial burden, (detailed below) the impact of these commissioned housing support services ceasing to exists would be:
 - Increased rough sleeping
 - o Worse long term outcomes for individuals and families
 - Increased number of hospital admissions
 - Increased care act assessments
 - o Increased risk to the public (loss of offender specific services)
 - Increased number of temporary accommodation placements outside of the area
 - Loss of government funding (MHCLG grant)
- 5.2 The key issues for all Housing Authorities is the additional pressures on teams and budgets to accommodate people with complex health and social care needs in Temporary Accommodation earlier, and for longer. The onus is therefore placed upon all Councils to undertake as many activities as possible to prevent homelessness were possible, and enable individuals and families to maintain tenancies, and to source and sustain affordable accommodation.
- 5.3 Should the budget proposals be agreed, Housing Authorities are unaware how the Social Care Authority will manage their responsibilities they have in meeting their obligations under the Children Act and Care Act responsibilities. It is essential that we do not move vulnerable people between Housing Authorities and the Social Care Authority. We should collectively attempt to collaborate so that our most vulnerable residents have seamless housing support.
- 5.4 The task and finish group (proposed) provides an opportunity to look at how the preventative elements of the support services are commissioned by the Social Care Authority. However, if alongside this, services that provide accommodation are significantly affected, then the capacity of the system to be able to prevent and provide support is likely to be exhausted. There is, therefore, a need to take a whole system approach to reviewing how all councils commission, manage and deliver services for vulnerable people.
- 5.5 It is important that Housing Authorities and the Social Care Authority recognise the importance of prevention. In many respects it is irrelevant whether housing related support grants are discretionary as they have the ability to save millions for local authorities. Cutting the housing support grant in its entirety will put more pressure on other services and cost all councils considerably more. Councils should prioritise independent living in their commissioning strategies, and recognise the importance of preventative support services in relation to this agenda.
- 5.6 A further consideration is the impacts for commissioners:
 - Adults and Children's social care commissioners there are a variety of health and social care contracts that are due to expire in March 2019 and have not been recommissioned. What will be the impact of that combined with the

- withdrawal of supported housing funding? What is the link to Better Care Funding?
- CCG commissioning The Social Care Authority may not commission some services. How will this link to homelessness and residential care?
- PCC commissioners housing officers are keen to understand the landscape and this could be included in future discussion. This will directly affect outreach work with the street community
- The Social Care Authority commissioners for drugs and alcohol services what will be the impact on these services?
- National Probation Service and Criminal Justice Board how is offender support commissioned and how can we align resources going forward.
- 5.7 There may be further operational impacts to other 'systems'. For example:
 - Occupational Therapy The Social Care Authority and Hospitals?
 - Primary Care GPs?
 - Western Hospitals Trust A&E & hospital Admissions & discharge
 - Sussex Partnership Foundation Trust = mental health providers concerns re discharge to the street
 - Social care adults and children?
 - Hospital Trusts A&E in particular will the loss of supported accommodation lead to increased hospital admissions? Direct health service providers should be asked eg practice managers and GPs, health visitors, Occupational Therapists likewise (OTs) etc. as they will be able to provide case studies and a view on the impact of supported housing and what the lack of it would do to their caseloads
 - Police?
 - Probation?
- 5.8 There is also an opportunity to work with Health and Wellbeing Boards as they have responsibility for preventative housing support services and shape the health agenda. The need for housing related support should also be included in the local Joint Strategic Needs Assessment.

6. Proposals

The following provides background information to the six recommendations for this report.

- a) An extension of the current commissioned services of up to 12 months need to be agreed through to March 2020 to provide an opportunity for further collaboration, engagement and assessment of the impacts on local communities. Our review confirms that all of our Strategic Housing Officers expressed a concern over the timeframe, even with the 6 month reprieve proposed. They felt it would be impossible to come to a conclusion within 6 months. There are 18 providers delivering 22 contracts within the proposed £6.3m cut and more time will be needed to engage and consider matters fully. The impact of the LAN reduction should be included because it is considered an essential component of supporting people in the community.
- b) The Social Care Authority should also identify and engage with other stakeholders that could have a positive impact on housing support (e.g. PCC, CCG). It is important that they also explore the opportunity of other potential funders to provide ongoing revenue support, for example the CGL Ex-offenders service. It may also be appropriate to approach other specialist agencies to see what their position would be in terms of providing ongoing revenue funding.

Agenda Item 6 Item 6a Appendix 3

- A task and finish group will be set up with a representative from the Social Care Authority and each of the Housing Authorities to look at how we can collaborate more. seek joint efficiencies, remodel provision and identify what alternative funding streams could be made available, including from other agencies. The group could also consider how the remodelling would be carried out. There has been a suggestion that commissioning and delivering services should come back to the Housing Authorities, perhaps with a jointly funded post, hosted by one of the Housing Authorities to provide an overview. However, the current workload of Housing Officers might delay progress Therefore, a better proposal would be to fund consultants to work with housing officers and the Social Care Authority staff to completely remodel the service. Furthermore, the group should commit to working collectively with our Housing Authorities Revenue and Benefit teams to offset any reductions to our clients. Clear Terms of Reference should be developed quickly to ensure the group identify all the various strands of supported housing provision and produce recommendations as quickly as possible.
- d) The Social Care Authority should also consider the overlapping boundary issues that occur to determine any efficiencies across areas of West Sussex, rather than solely Housing Authority geographical boundaries.
- e) The Social Care Authority should provide detail of the impact these cuts will have on their own internal budgets, particularly in relation to Adult Social Care and Children's Services statutory obligations and how they intend to discharge these duties in the absence of supported housing funding to local providers.
- f) Housing Authorities also request sight of the risk assessment and equalities impact assessment with regard to the impacts of the proposals on Housing Authorities, other statutory bodies and service users.

7. Annexes

- Annex A Financial details from:
 - Adur and Worthing Councils
 - o Arun District Council
 - Chichester District Council
 - Crawley Borough Council
 - Horsham District Council
 - Mid Sussex District Council
- Annex B Briefing notes:
 - Homelessness Reduction Act 2017
 - Rough Sleeping Strategy briefing

Adur and Worthing Councils

Table 1: Impact Assessment of Reduction of Funding for Supported Accommodation

Notes

- Financial assumptions: all costs of TA are based on an average cost of £50 per night per person and are shown both as Gross and Net after HB assuming all HB/rental is collected and returned. HB is calculated at 90% of LHA
- It is a given that the costs to individuals and families of having supported accommodation removed and replaced by unsuitable Temporary accommodation are immense, long lasting and to a great degree unmeasurable

	Service Type	Units	Contract Value & (Cost to A&W of TA)	Statutory ? (WSCC to complete) Yes/No	If withdrawn, alternative delivery for statutory duties (WSCC to complete)	D&B narrative – consequences or risks of withdrawal
Young People 16-25						
Home Group - Phoenix	Supported accommodation for young people with complex needs.	15	£205,913 Net cost of TA (£200, 750)			Mental Health provision for young people On arrival into service 56% under 18 receiving service from MH. 21% with probation. 34% were either rough sleeping or sofa surfing when arrived in service. Added value: 5 move on flats with 8 occupants. Impact: Minimum 14YP in immediate need of TA; estimated total per annum 23. Given the complexity of cases = high risk of TA eviction and rough sleeping. Additional resource would therefore be needed to case manage these young people in TA if this was the outcome TA Cost: £419,740 per annum (gross - 23

				households for 1yr) - average
YMCA - Worthing Foyer and Roland House	Supported accommodation for homeless young people with support needs (includes rent element for 2 quick access beds for 16/17 year olds	33	£231,485 Net cost of TA (£441, 650)	26 units in main hostel. 7 move on. 33% of income stream from WSCC. 5% own funding stream. 62% rental income. 90% residents Adur/Worthing connection. 41% careleavers. 35% will require care act assessment with potential eligible needs if accommodation ends 80% have substance misuse; 23% receiving mental health treatment; 42% have diagnosed MH and untreated. 19% with probation. Added Value: In house education + 23 Empty Homes units (+12 in pipeline: move on for project and accommodation for suitable prevention / hless cases) Impact: 90%= 30 in immediate need of TA; estimated total per annum - 53. (with a third potentially needing Care Act assessment and support). Complexity of cases = high risk of TA eviction and rough sleeping. Affordability for move on into PRS will be an issue While YMCA may remodel as general needs, if is unlikely to be financially viable as given the age of the client group they would only be eligible for single room rate HB TA Cost: £967,250 per annum (gross)

Sanctuary	Supported accommodation for homeless young people with support des rent element for 1 quick access bed for 16/17 year olds	25	£213,570 (Net cost of TA £334, 581)		17 shared units. 8 self contained. 84% residents Adur/Worthing connection. 24% care leavers. 24% will require care act assessment with potential eligible needs if accommodation ends. 16% history of rough sleeping. 32% substance misuse issues. Impact: 84% = 21 in need of TA estimated total per annum 40. TA Cost: £730,000 per annum (gross) 25 single beds per year would be needed to replace this provision: Note - Complexity of cases = high risk of TA eviction and rough sleeping. Affordability for move on into PRS will be an issue

Prevention of Homelessness				
Southdown ILS	Accommodation with floating support	63	£144,233	All residents have either rough slept or have been homeless and received a service from
	for vulnerable		Impact Net	AWC and/or Single Person 'Pathway' provider.
	working age adults		TA	

			(£281, 050)	Impact: Estimate 33% - 21 eligible for TA TA Cost: £383,000 per annum (gross) 77% rough sleeping when accommodation ends.
Southdown co- located workers	Floating support service dealing with homeless prevention (2 workers)		£79,949	Approx 50 cases at any one time that Housing Support Advisors would need to work with. Key risk that those with higher support needs would not receive level of support needed. Impact would be additional work for housing teams and an increase in intentionally homeless households.
Safe in Sussex	Womens' Domestic Violence Refuge	6	£45,776 Net cost of TA £87, 510	Impact: AWC 6 households in TA as will have fled area of Local Connection. estimated total per annum - 16, TA Cost: £292,000 (gross)
Turning Tides (Worthing Churches Homeless Project)	Supported hostel type accommodation for homeless people	67	£271,685 Cost of TA (through-put £548, 710)	In total WSCC fund 67 beds (53 high support) across the Turning Tides portfolio - with an annual throughput of 191. For Adur & W there are three key projects that would be affected Byron and Manor Road (28 units) Lyndhurst Road (39 units - data based on 24units as not received full data set) Combined Impact of 100% loss of WSCC

				funding
				Turning Tides have modelled a loss of 100% of funding that would result in Manor Road and Byron Closing and Lyndhurst Road becoming medium support need accommodation only.
				The funding would have to operate with reduce staffing levels which will result in less support and possibly increase ASB and more street homelessness.
				Reduced staff may impact on the schemes ability to work with more chaotic residents.
				Financial impact of loss of 29 supported beds and increases in rough sleeping and other needs we assume an annual case load of 41 for the Councils
				Cost of TA (gross) = £747,761
Life	Supported accommodation for young parents	5	£38,980 Impact on TA (£61, 716)	AWC would have housing responsibility for all homeless - Social Services will need to provide support for all as parents with support needs Impact: 5 households in TA. Estimated total prannum:9 TA Cost: £164,250 per annum (gross)
Hama Crave	Cura na uta di ba a tal	45	0040.040	
Home Group - Offenders	Supported hostel type accommodation for	15	£240,043 Impact	Currently none of these cases impact AWC. %split of local connection unknown.
	chaotic younger offenders		TA Cost (£200, 748)	Impact: Assuming 85% with local connection: AWC 13 in TA (If risks permit). Estimated total

				44 per annum in TA.
				TA Cost: £803,000 per annum (gross)
CGL Offender House	Supported accommodation for High Risk Offenders.	10	£94,489 Impact TA net costs (£133, 832)	Impact: AWC 10 rough sleepers as likely too high risk for TA. 32 per annum. Net TA Cost x 10 x 1 yr =£133,832.40
		239	£1,566,123	

Older People				
Saxon Weald - Highdown Court Extra Care Housing Scheme	supported accommodation	54	£13,231	54 one and two-bedroom apartments for rent and shared ownership. Over 60s who need support with day-to-day living. Likely to need Care Act Assessments to establish eligible care needs. Impact: It is difficult to place a financial cost on this and effectively there would be mixed outcomes that would in all likelihood fall on the landlord, the NHS and WSCC.
				WSCC would need to provide care support to enable them to live independently or care placement if they cannot do so with care support.
Peabody - Here to Help	tenure neutral floating support	not specified	£35,251	Report 62 households per annum supported. Impact: see above
Worthing Homes	floating support to	not	£120,000	Support 270 tenants supported per annum
- housing for	social housing	specified	2120,000	Support 270 teriants supported per annum

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older people	properties			Impact: as above for Saxon Weald
Guild Care: Dolphin Court "Extra Care Light" housing scheme	supported accommodation	32	£10,000	Sheltered Housing Scheme 31 Studio Units. Supported to maintain independence - daily living tasks - cleaning and personal care. If support withdrawn - likely to need Care Act Assessments to establish eligible care needs.
				Impact: See above
		86	£178,482	
		325	£1,744,605	

Table 2: Financial Summary

Impact of complete withdrawal of funding				
Organisation	County support	Number of units	Likely annual caseload	EA / TA equivalent costs per year
Home Group - Phoenix	205,913	15	23	307,810
YMCA - Worthing Foyer and Roland House	231,485	33	53	709,310
Sanctuary	213,570	25	21	281,050
Southdown ILS	144,233	63	21	281,050
Southdown co-located workers	79,949			0
Safe in Sussex	45,776	6	6	87,510
Turning Tides	271,685	67	41	548,710
Life	38,980	5	9	120,450

240,043	15	44	588,860
94,489	10	32	428,260
13,231	54	0	0
35,251		0	0
120,000		0	0
10,000	32	0	0
1,744,605		250	3,353,010
			332,000
			3,685,010
	94,489 13,231 35,251 120,000 10,000	94,489 10 13,231 54 35,251 120,000 10,000 32	94,489 10 32 13,231 54 0 35,251 0 120,000 0 10,000 32 0

Table 3: Financial Resources Available and Committed - Adur & Worthing Councils

Adur District Council								
Financial resources available								
Budget	2018/19 Budget Level (Annual or one off grant)	Source	Spend / Usage	Notes				
Discretionary Housing Payment	130,002	DWP	130,002	Can only be used to top-up housing benefit payments for existing claimants. Adur spends close to the overall allocation each year.				
Additional Burdens Funding	27,216	MHCLG	34,000	The additional burdens funding was given for the introduction of the Homeless Reduction Act. In Adur and Worthing the cost of the additional staff was £125,000 across the two Councils and consequently, the Council chose to top-up the budget from general resources. Since the introduction of the act the Councils have seen a further rise in the number of cases costing an additional £370,000 per				

			year, of which £100,000 is attributable to Adur.
Flexible Homeless Support Grant	206,019	MHCLG	Flexible Housing support grant replaces payments made via the housing benefit system. Councils used to receive £60.00 per week per claimant. As a result of this change, overall income for the service does not increase with the level of demand on the service. In 2018/19 there is additional income of £52,480, (which is all contributing to costs associated with TA) In 2019/20 the grant will reduce to £138,739 at which point the Councils will be receiving at least £14,000 less than the amount received via the old HB system. We expect this funding stream to be rolled into RSG / retained business rates in 2020/21. This funding contributes towards the cost of temporary and emergency accommodation together with rental income.
Other MHCLG grant(s)			
None			
New Homes Bonus	202,440	MHCLG	New Homes Bonus is used to part-fund the net cost of the general fund and so is not available for any other purpose. The overall amount of NHB will reduce down in 2019/20 to £115,908.
Other (please list)			

Rental payments from tenants Worthing Borough Council	312,000	Tenants / HB payments	647,981	Rents from Adur Homes are ring fenced into the Housing Revenue Account and can only be used for to fund management, maintenance and major improvements of the housing stock and to support the borrowing costs that exist in terms of the existing level of housing debt. TA rents are set by government at a maximum of 90% of January 2011 LHA Rates. The average cost of temporary accommodation is in the region of £350 per week for a household with only £109 recoverable from Housing Benefit. Adur Council uses all of its Flexible Homelessness Support Grant to fund the net shortfall in temporary accommodation cost. The project shortfall next financial year will be met from the General Fund
		Financia	l resources	available
Budget	Budget Level (Annual or one off grant)	Source	Spend / Usage	Notes
Discretionary Housing Payment	228,477	DWP	228,477	Can only be used to top-up housing benefit payments for existing claimants. Worthing spend close to the allocation each year.
Additional Burdens Funding	44,440	MHCLG	91,000	The additional burdens funding was given for the introduction of the Homeless Reduction Act. In Adur and Worthing the cost of the additional staff was £125,000 and consequently, the Council chose to top-up the budget from general resources.

				Since the introduction of the act the Councils have seen a further rise in the number of cases costing an additional £370,000 per year, of which £270,000 is attributable to Worthing.
Flexible Homeless Support Grant	137,743	MHCLG	137,743	Flexible Housing support grant replaces payments made via the housing benefit system. Councils used to receive £60.00 per week per claimant. As a result of this change, overall income for the service fell. In 2018/19 the shortfall is estimated to be £177,000. In 2019/20 the grant will increase to £151,922 at which point the shortfall is estimated to be £163,000.
Other MHCLG grant(s)				Shortan is estimated to be 2 105,000.
•				
Rough Sleeping Initiative	271,094	MHCLG	271,094	Bid based grant allocation which can only be used for the purpose awarded. A provisional allocation of £340,000 for 2019/20 has been made, however whether this is received is based on a) progress to implement the current bid and outcomes b) ability to deliver sustainable outcomes to reduce rough sleeping. Should the changes to supported accommodation commissioning go ahead as indicated, these fund are at risk.
New Homes Bonus	1,220,868	MHCLG	1,220,868	New Homes Bonus is used to part-fund the net cost of the general fund and so is not available for any other purpose. This will reduce to £1,045,082 in 2019/20.
Other (please list)				
Rental income	913,000	Tenants / HB payments	1,834,257	Worthing Council does not have a Housing Revenue Account as it owns no residential housing stock.
				TA rents are set by government at a maximum of 90% of January 2011 LHA Rates as above.

Table 3: Additional funds to support the prevention of homelessness

Grant funding/commission services Adur & Worthing Councils							
Provider	Level of funding (Annual or one off)	Project / Usage					
Adur Homes Sheltered Housing Support		Tenants pay as part of their service charge					
Going Local - Wellbeing Housing Advice Team	£40,000 (One off)	Provides housing advice through the Going Local social prescribing project at 4 GP Surgeries & to IPEH clients.					
Citizen Advice	£163,653	Annual contract co-commissioned with WSCC provides advice and guidance on Housing and related matters					
Infrastructure Support Service (Community Works)	£77,040	Annual contract co-commissioned with WSCC supports the third sector organisations in Adur & Worthing					
Guild Care Social Isolation	£33,990	Supporting people to stay independent					
Community Transport Grants	£50,000	Supporting people to stay independent					

Homeless Prevention and Assessment – Financial resources available and grant funding awards made to local providers

Arun District Council

	Service Type	Units	Value	Statutory? (WSCC to complete) Yes/No	If withdrawn, alternative delivery for statutory duties (WSCC to complete)	D&B narrative – consequences or risks of withdrawal
Young People 16-25						
Sanctuary	Supported accommodation for homeless young people with support needs (includes rent element for 1 quick access bed for 16/17 year olds	11	£102,474			Loss of low/medium level supported accommodation for young people who need short term supported accommodation (up to 2 years) in which to learn how to live independently. This is a valuable resource for placing young people who we would otherwise have a duty to provide TA under the homelessness legislation. Not all those accommodated in Sanctuary are considered to have a Priority Need under the homelessness legislation so ADC would not have a duty to place all those that Sanctuary currently accommodates. The project also provides a quick access bed for homeless 16/17 year old.
Prevention of Homelessness						n 6a
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Sanctuary	Supported accommodation for vulnerable working age adults	26	£180,018	Loss of supported accommodation for vulnerable adults, including those with mental health issues. This is avaluable resource intended tow provide residents, some with accommodation for up to 2 years with a view to enabling them to manage their tenancies independently. The loss of this service will result in increased homelessness and use of TA at a cost to the council and increased reluctance for social landlords to accept nominations of adults with more challenging support needs.
Bognor Housing	Supported hostel type accommodation for	20	2100/010	As above
Trust	homeless people	25	£105,811	
Stone Pillow	Supported hostel type accommodation for homeless people	16	£50,000	As above
Life	Supported accommodation for young parents	4	£31,184	The service accepts referrals from the Housing Needs Team and other agencies. The loss of this service will result in increased homelessness and use of TA at a cost to the council
Southdown co-	Floating support service dealing with homeless			Without this service, homelessness prevention work will fall and result in increasing TA costs to the Council & also to WSCC as they would ultimately have to pick up those Intentionally Homeless (IH)
located worker	prevention (1 worker)	1	£32,412	families and possibly IH

				vulnerable adults.
CGL Offender Houses	Supported accommodation for high risk offenders	10	£94,489	Impact on Arun Council Homes, TA and Arun homelessness service. Has there been any dialogue with the Probation service?
		92	£596,388	
Older People		92	2390,300	
Saxon Weald - Abbotswood Extra Care Housing Scheme	supported accommodation	62	£13,231	The removal of the subsidy for Extra Care Landlords will affect the delivery of this type of accommodation in the district. Saxon Weald (Abbotswood) has a contract that funds the support provided by the scheme manager equating to £13,231 pa. The provider may be able to mitigate the potential loss of this funding via enhanced housing management charges being added to the rent account and by levying a small charge to residents to assist to meet support costs.
			·	The impact of withdrawing the cross tenure floating support service will have more serious impacts across the County. This service provides valuable assistance to older people who
Peabody - Here to Help	tenure neutral floating support	not specified	£287,884	service provides valuable assistance to older people who may otherwise be without support, be isolated and needed assistance with a range of

				76
				housing related needs.
	DA resettlement service. Has accommodation for female victims of domestic abuse			Any cut in funding will have a devastating impact on critical services which are already stretched. District and boroughs do not have the facilities, expertise nor funding to replicate these services. The withdrawal of this service would have an
				adverse impact of WSCC as
	and a drop in facility for			children are often affected.
Safe in Sussex	advice.			
	Working with victims of domestic abuse to support, advise and secure alternative accommodation, or remain in current accommodation with legal remedies in place. DV MARAC may be affected			Low level floating support helps prevent referrals to higher level crisis facilities such as refuges. The provision of this service has a hugely positive impact on the individuals as well as decreasing costs for districts / boroughs and WSCC as children are often affected.
Homegroup	by this.			
		62	£301,115	
		154	£897,503	

Arun District Council

Financial resources available						
Budget Budget Level Source Spend / Usage						
	(Annual or one off					
	grant)					
Discretionary Housing	£319,720	DWP	Spent and committed			
Payment			£210,000 to date on			

Item 6a

			Homelessness Prevention and covering the Spare Room subsidy
Additional Burdens Funding	£65,000	MHCLG	
Flexible Homeless Support Grant	£350,289	MHCLG	
Other MHCLG grant(s)			
New Homes Bonus			
Other (please list)			

Grant funding provided by Arun District Council					
Provider	Level of funding (Annual or one off)	Project / Usage			
Stonepillow	£10,000	To provide funding for rent and utilities at the supported hostel			
SWEP	£15,000	Emergency winter accommodation provision			

Homeless Prevention and Assessment – Financial resources available and grant funding awards made to local providers

Chichester District Council

	Service Type	Units	Value	Statutory? (WSCC to complete) Yes/No	If withdrawn, alternative delivery for statutory duties (WSCC to complete)	D&B narrative – consequences or risks of withdrawal
Young People 16-25						
Southdown - Myplace	Accommodation with floating support for care leavers and complex homeless young people	18	£67,525			Housing related support aims to help vulnerable young people sustain or achieve independence in their home and this support is aimed at care leavers and young people. Savings in this area could result in higher long term costs as a result of increasing homelessness due to arrears, increased debt, inability to stay in education or employment, dependency on statutory services and the closure of specialist affordable housing. These resulting costs will impact on not only CDC but WSCC, the NHS and the voluntary sector. There would be increased pressure on the CDC Housing service and temporary accommodation. However impacts would be not only on the Housing service, but on the whole community due to increased rough sleeping, ASB, offending. Part of this relating to Care Leavers could be a statutory responsibility for WSCC.

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Prevention of Homelessness					
Stone Pillow	Supported hostel type accommodation for homeless people	47	£140,735		StonePillow provide a very specialised support service. If this funding was withdrawn and the hostel was forced to close we would see increased rough sleeping in the District. This has economic and social impacts on the whole community. If the hostel were to close rough sleepers may tip into the care or healthcare system. There would be increased pressure on the CDC Housing service and temporary accommodation. If funding is reduced StonePillow may be forced to reduce staffing levels at the hostel. This would mean they would be unable to accept the highest need cases as there would not be sufficient supervision. This would result in clients with complex needs, including those with mental and physical health problems being forced to sleep rough.
Southdown ILS	Accommodation with floating support for vulnerable working age adults	50	£144,233		Housing related support aims to help vulnerable people sustain or achieve independence in their home. Savings in this area could result in higher long term costs as a result of increasing homelessness due to arrears, increased debt, inability to stay in education or employment, dependency on statutory services and the closure of specialist affordable housing. These resulting costs will impact on not only CDC but WSCC, the NHS and the voluntary sector. Impacts would be not only on the Housing service due to increased homelessness, but on

Southdown co- located worker	Floating support service dealing with homeless prevention (2 workers)	2	£79,949	the whole community due to increased rough sleeping, ASB, offending. For the individual the risk is that they would be unable to sustain their tenancy. They may tip over into the care or healthcare systems. CDC has two co-located workers, and our Housing team makes referrals. The service aims to prevent homelessness for two groups: families with children who are at risk of being found intentionally homeless & single adults at risk of rough sleeping. This would be a very direct loss to CDC of 2FTE. For the individual and families the risk is as above.
				There would be increased pressure on the CDC Housing service and temporary accommodation.
CGL Offender Houses	Supported accommodation for high risk offenders	6	£56,699	Should this funding be withdrawn the Probation service would have to access housing for high risk offenders in the private rented sector. They would remain unsupervised and this could result in re-offending and anti social behaviour, debt and potentially homelessness.
		121	£489,141	
Older People				
Places for People – Leaholme ECH	supported accommodation	40	£15,600	Withdrawal of this funding could mean older vulnerable people not having help at hand to support them to live independently. This would be particularly concerning for those with health

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Appendix 3	nda item 6

				conditions. If this support is not available residents could tip into the care system.
Hanover – Lapwing Court ECH	Supported accommodation	28	£10,000	As above.
Peabody - Here to Help	tenure neutral floating support	140	£88,128	This is floating support to help people to stay in their homes. If this support were not available that is a large number of older clients who may be struggling with debt, arrears on their rent or mortgage or other housing related issues. They may be living in cold or damp conditions, or be in need of an adaptation and unable to access the assistance they need. The impact of this is that the individual may be unable to stay at home safely.
		68	£113,728	
		189	£602,869	

Chichester District Council

		Financia	l resources available
Budget	Budget Level (Annual or one off grant)	Source	Spend / Usage
Discretionary Housing Payment	£202k	DWP	Ringfenced for discretionary housing payments.
Additional Burdens Funding	£46k for 18/19 ongoing new burdens funding for Homelessness reduction act	MHCLG	This funding is a reflection of the additional burdens put on LA's to deliver the Homelessness Reduction Act. It has proved to be insufficient to cover the cost of the additional staff needed. It has been spent on Housing Options and Housing Welfare staff to prevent homelessness.
Flexible Homeless Support Grant	£147k for 18/19 there is currently no indication of how long this grant will continue	MHCLG	This funding is to compensate LA's for the loss of the Temporary Accommodation Management Fee. Most LA's will have lost an equivalent amount through a reduction in benefit subsidy so it is not additional funding. In fact CDC did not lose an equivalent amount and the balance has been spent on additional staff to assist with the introduction of the Homelessness Reduction Act and to replace a Southdowns floating support worker that was withdrawn by WSCC two years ago in a previous round of cuts.
Other MHCLG grant(s) New Homes Bonus	£2.314m for 18/19. This is not guaranteed funding and is likely to be withdrawn.		Reserved for community use and affordable housing.
Other (please list)			

Grant funding provided by Chichester District Council						
Provider	Level of funding	Project / Usage				
	(Annual or one off)					
StonePillow	£27k – 3 year funding agreement	 Grant awarded towards the Old Glassworks Day Centre, now known as "The Hub". The two main aims of the service are: to provide crisis support and intervention (clothes, food, warmth, access to health care etc.) to provide tailored support and stop the cycle of homelessness, reconnect individuals to their place of origin and secure longer term accommodation 				

Housing support in CDC area

Below is a table with the <u>CDC element</u> of the housing support that is being considered for budget cuts with a short explanation of the services provided (some further detail is still awaited from WSCC). In addition to these there are services we refer into and some countywide services listed below.

Southdown – MyPlace Throughput 28	£68k	Relates to young people. Accommodation with floating support for care leavers (10 units) and young people at risk with complex needs (18 units). RPs will allocate units of accommodation to clients on the basis of this support being in place. Part of this is statutory in relation to Care Leavers so WSCC should retain some of this budget.
StonePillow	£140k	This funding supports StonePillow in taking homeless clients into the hostel (11 units), and hospital discharge (5 units).
Throughput 237		StonePillow also provide "move on" accommodation as a pathway for moving people from the hostel into more permanent accommodation, and the Glasshouse hub which provides facilities, shelter and support for rough sleepers and other vulnerable clients (which CDC part fund).
Southdown – ILS (independent living scheme)	£144k	Accommodation with floating support for vulnerable working age adults. ILS schemes predominantly provide support for people with mental health issues or learning disabilities.
Throughput 57		
Southdown co-located	£80k	CDC has two co-located workers, and our Housing team makes referrals. The service aims to prevent

workers Throughput 96		homelessness for two groups: families with children who are at risk of being found intentionally homeless & single adults at risk of rough sleeping. This would be a very direct loss to the team of 2FTE.
CGL (Change Grow Live) Offender house Throughput 19	£57k	Service is for high risk offenders who are homeless when released from prison. This funding pays for supervision and monitoring of residents at an HMO. Referrals are via the Probation Service.
Places for people - Leaholme (Extra Care) Units 40	£16k	Extra Care schemes are funded by HB & personal care budgets. This support is for people who don't reach the threshold to be eligible for care but may have some support needs, e.g low level mental health issues. This funding is a contribution towards the salary of the scheme manager.

Hanover - Lapwing Court (Extra Care)	£10k	As above.
Office 25		
Peabody - Here to help	£88k	"Here to help" supports older people who face housing related risk, for example, an older person living in a caravan with health problems could be at risk of tipping into the care system. Clients may be owner
Throughput 140		occupiers or in the PRS. Referrals are via Social Care Teams. Without this service people could end up either in social care or homeless so it is seen as high value.

Total £603k

In addition to these organisations we also access (by referral) some other organisations on the list:

Safe in Sussex		Referrals on a regular basis. Domestic violence refuge.	
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Sanctuary	Referrals on a regular basis. Youth homelessness.	
Bognor housing trust	Rare referrals. Hostel.	
Crawley open house	Rare referrals. Direct access (Need more information on this)	
Worthing churches	Rare referrals. Homelessness service.	
Home Group	Rare referrals. Ex Offender short stay.	
Life Housing	Rare referrals. Young parents.	
YMCA	Rare referrals. Foyers and youth homelessness.	

Other WSCC county-wide services provided by SouthDowns include those below – no indication of a D&B split has been received:

Other WSCC county-wide services provided by South Downs include those below — no indication of a D&D split has been received.				
Hospital discharge work	£213k	Acute settings and general needs hospital discharge work. Workers identify housing needs of clients in		
		acute mental health units and offer support to prevent homelessness.		
Throughput 345 (WS)		4FTE + manager		
Money management	£145k	3FTE + manager		
outreach worker & financial				
inclusion officer				
Management of Supported	£227k	8FTE – I understand these are SouthDowns admin staff so no service delivery impacts.		
Housing, co-located staff				
and admin				

Homeless Prevention and Assessment – Financial resources available and grant funding awards made to local providers

Crawley Borough Council

	Service Type	Units		Value	D&B narrative – consequences or risks of withdrawal
Young People 16-25					
YMCA – Crawley Foyer	Supported accommodation for homeless young people (includes rent element for 2 quick access beds for 16/17 year olds)	3	8	£237,725	Loss of a key plank in the housing pathway supporting vulnerable young people. Increase in repeat homelessness and rough sleeping with associated social, health and welfare issues and increased costs to other statutory and acute servicesIncreased costs to WSCC in accommodating care leavers
YMCA – Ewhurst Road and other dispersed accommodation	Accommodation with floating support for homeless young people	2	6	£97,652	Increased and repeat homelessness due to failure to sustain tenancies
accommodation	nomeiess young people	3	0	£97,032	teriancies
Prevention of Homelessness					
Crawley Open House	Supported hostel type accommodation for homeless people	2	4	£262,075	Increase in homelessness/rough sleeping and health, welfare and social issues associated with street homelessness

				with additional financial
				burdens falling on
				other acute/statutory
				services. Non-
				compliance with
				expectations set out in
				Government's Rough
				Sleepers strategy for
				targeted prevention
				enabled by all parts of
				Government coming
				together. Likelihood of
				levering in additional
				Government funding to
				improve existing and
				develop new services
				declines
				Increased numbers in
	Accommodation with			crisis and failing
	floating support for			tenancy sustainment
	vulnerable working age			resulting in increased
Southdown ILS	adults	38	£86,702	levels of homelessness.
				Loss of the short term
				intensive support
				required to prevent
				homelessness. Rise in
				homelessness across
				all client groups. Loss
				of a key tool in
				promoting social
	Floating support service			inclusion and stable
Southdown co-	dealing with homeless			communities through
located worker	prevention (2 workers)	2	£77,789	tenancy sustainment
				Young parents not
				enabled to develop
				parenting and life
				skills. Impact on health
				and well-being of
	Supported accommodation			children and future
Life	for young parents	6	£46,776	educational attainment

		142	£808,719	
Older People				
Crawley Homes – housing for older people	Floating support to social housing properties	Not specified	£71,000	Increased demand for acute higher cost services. Increased hospital admissions and bed blocking.
Hanover Housing – Lanehurst Gardens ECH	Supported accommodation	33	£10,000	Closure of extra-care facilities will increase residential care placements and costs to WSCC
Peabody - Here to Help	tenure neutral floating support	not specified	£11,750	Limited take-up in Crawley
		33	£92,750	
		175	£901,469	

Crawley Borough Council

Financial resources available					
Budget	Budget Level (Annual or one off grant)	Source	Spend / Usage		
Discretionary Housing Payment	£336,760	DWP	Allocated in accordance with the statutorily defined criteria		
Additional Burdens Funding	£50,326	MHCLG	Allocation fully spent on homelessness prevention measures		

Flexible Homeless Support Grant	£516,024	MHCLG	Used to fund x3FTE staff plus x1 temporary part-time post to resource additional demand generated by the HR Act,
			homelessness prevention payments and contracts for floating support, CAB debt advice and subsidising PSL arrangements
Other MHCLG grant(s)			
New Homes Bonus	£1,467,303	MCHLG	Mainstreamed and fully utilised to support General Fund services
Other (please list)	£25,873	DWP	Universal Credit digital and personal support – paid to the CAB

Grant funding provided by Crawley Borough Council						
Provider	Level of funding	Project / Usage				
	(Annual or one off)					
Crawley Open House	£75,000	Outreach homelessness				
		support and day centre				
		provision				
North & South West Sussex	25,200	Counselling				
Relate						
Home Start Crawley	£17,728	Support for young parents &				
		children, troubled families				
Surrey & Sussex Rape Crisis	£5,000					

West Sussex Mediation Service	£3,000	Sustainable
		communities/tenancies

Homeless Prevention and Assessment – Financial resources available and grant funding awards made to local providers

Horsham District Council

	Service Type	Units	Value	D&B narrative – consequences or risks of withdrawal
Young People 16-25	7,50			
YMCA – Horsham Y Centre and dispersed properties	Supported accommodation for homeless young people (includes rent element for 2 quick access beds for 16/17 year olds)	51	£280,172	Substantial risk. Dependent upon the YMCA response and how the service will be structured without this level of funding. Reduction in provision would lead to increased homeless approaches to HDC and an increase in the length of stay young people have in homeless accommodation due to the lack of alternative accommodation options.
Prevention of Homelessness				
Southdown ILS	Accommodation with floating support for vulnerable working age adults	44	£86,702	Withdrawal will increase costs to HDC as households remain in emergency homeless accommodation longer whilst alternatives are identified. Without ILS accommodation there is a risk that we refuse applications for assistance from households we consider to be unable to progress a homeless application. These households may then need increased input from mental health services,

				adult social care etc
Southdown co- located worker	Floating support service dealing with homeless prevention (2 workers)	2	£70,226	Will lead to an increase in homelessness. In Horsham the co-located staff support registered providers eviction cases to prevent eviction, attend court and monitor cases that would otherwise become intentionally homeless and the responsibility of WSCC.
CGL Offender House	Supported accommodation for high risk offenders	4	£37,790	Impact unlikely to be significant as a majority of placements to CGL accommodation are without a local connection to the district. This type of accommodation needs to be provided but could it be funded by probation services?
Safe in Sussex	Women's domestic violence refuge	7	£53,738	Similar to above, this type of accommodation needs to exist but we don't access the Horsham refuge for households that approach us as fleeing DV.
		106	£528,628	
Older People Saxon Weald - Highwood Mill ECH	Supported accommodation	105	£27,074	As below.
Saxon Weald – Leggyfield ECH	Supported accommodation	57	£13,231	
Saxon Weald – Osmund Court ECH	Supported accommodation	40	£13,231	

Peabody - Here to Help	tenure neutral floating support	Not specified	£41,126	Not used in the Horsham District.
Saxon Weald – housing for older people	Floating support to social housing properties	Not specified	£57,000	Challenging to estimate but service prevents a number of older residents from needing to approach our services at crisis point for money/debt advice, emergency moves etc. We may need to expand funding in areas such as financial advice if we experienced an increase in demand.
			•	
		202	£151,662	
		308	£680,290	

Horsham District Council

	Financial resources available						
Budget	Budget Level	Source	Spend / Usage				
	(Annual or one off						
	grant)						
Discretionary Housing	£155k (2018/19)	DWP	Allocated by HB team for crisis intervention				
Payment	amount changes but						
	annual award						
Additional Burdens	£99k over three years	MHCLG	Allocated to mitigate the additional responsibilities placed				
Funding	(2017 – 2020)		upon LA's as a result of the Homeless Reduction Act (HRA).				
			HDC has added to this funding to restructure the homeless				
			advice team which included three new staff.				
Flexible Homeless	£473k over four years	MHCLG	This funding essentially replaced the temporary				
Support Grant	(2016 – 2020)		accommodation management fee LA's could previously				
			claim through HB.				
			As such it is not <u>new</u> funding. This funding was used				

		historically to create our private lettings service and sustains its presence. It also supported the restructured service to mitigate the impact of the HRA.
Other MHCLG grant(s)		
New Homes Bonus	£4.827m 2018/19 This is not guaranteed funding and is likely to be withdrawn.	Used to strengthen the Council's ability to generate income from appropriate investments in order to receive income to support future service delivery and secure the delivery of infrastructure to serve the needs of the district's residents.
		This funding is not linked the housing department or ring fenced in any way for the delivery of housing service functions.
Other (please list)		

Grant fu	Grant funding provided by Horsham District Council						
Provider	Level of funding (Annual or one off)	Project / Usage					
Worthing Churches Homeless Project / Turning Tides	£8000 – Per year for two years	Support rough sleeper engagement and HDC homeless work – funds 12 hours a week					
Worthing Churches Homeless Project / Turning Tides	£22,000 – annually	Funding secured through MHCLG bid – Horsham proportion					
Citizens Advice Bureau	Confidential	CAB financial advisor operating from HDC offices to support households at risk of becoming homeless due to financial issues.					

Mid Sussex District Council

Homeless Prevention and Assessment – Financial resources available and grant funding awards made to local providers

	Service Type	Units	Value	D&B narrative – consequences or risks of withdrawal
Young People 16-25	.,,,,,		10.00	
				Loss of low/medium level supported accommodation for young people who need short term supported accommodation (up to 2 years) in which to learn how to live independently. This can be a valuable resource for placing young people who we would otherwise have a duty to provide TA under the homelessness legislation. However the YMCA does not meet the need of those with higher levels of support needs. If funding for the YMCA across the county is lost, MSDC would lose access to quick access beds for homeless 16 & 17 year olds who we may then have duty to accommodate under the homelessness legislation if they are deemed not to be a child in need. The establishment of the West Sussex services for YP follows the
YMCA – Acorn House, Mill Road and dispersed properties	Supported accommodation for homeless young people	13	£36,118	Southwark judgement ref 16 and 17 year old designated as Child in Need and the responsibility of LAs (WSCC) to accommodate. The arrangements made post this judgement ensured such young people were not bounced backwards and forwards between authorities. It is critical that there is no return to that situation.
Prevention of Homelessness				
Peabody Resettlement Service	Supported accommodation for vulnerable working age adults	34	£215,096	Loss of supported accommodation for vulnerable adults, including those with mental health issues. This is a valuable resource intended to provide residents, some with complex needs, with accommodation for up to 2 years with a view to enabling them to manage their tenancies independently.

				Without this we may find that we will have an increase in levels of rough
				sleeping and also in the number to whom we will have a duty to provide
				TA. The loss of this service will result in increased homelessness and use of
				TA at a cost to the council and increased reluctance for social landlords to
				accept nominations of adults with more challenging support needs.
	Floating support			Without this service, homelessness prevention work will fall and result in
	service dealing with			increasing TA costs to the Council & also to WSCC as they would ultimately
Southdown co-	homeless prevention			have to pick up those IH families and IH vulnerable adults.
located worker	(1 worker)	1	£39,974	have to place up those in runnings and in runnerable addition
	(=)			The loss of this service will result in increased homelessness and use of TA
				at a cost to the council. Higher level of intervention likely from WSCC if
	Supported			service not available and Childrens' services have a high level of
	accommodation for			involvement with the residents of the LIFE house.
Life House	young parents	5	£38,980	
	, carry par error	-		
		52	£330,168	
Older People				
				The removal of the subsidy for Extra Care Landlords will
				affect the delivery of this type of accommodation in the
				district. Hanover Housing have a contract that funds the
				support provided by the scheme manager equating to
				1
				£10,000 per annum. the provider may be able to mitigate
				the potential loss of this funding via enhanced housing
				management charges being added to the rent account and by
				, ,
				levying a small charge to residents to assist to meet support
Hanover Housing				costs.
- Arthur Bliss	Supported			
House ECH	accommodation	24	£10,000	
				The impact of withdrawing the cross tenure floating support service will
				have serious implications within Mid Sussex. This service provides
				valuable assistance to older people who may otherwise be without support,
Peabody - Here	tenure neutral floating			be isolated and need assistance with a range of housing related needs.
to Help	support	Not specified	£123,379	
	•			

	24	£133,379	
	76	£463,547	

Overall the impact of these proposals however, if these households had to be accommodated in emergency TA, the gross cost is likely to be £930k pa.

Mid Sussex District Council

Financial resources available							
Budget	Budget Level (Annual or one off	Source	Spend / Usage				
Discretionary Housing Payment			Spend to make up shortfall in HB when gap. This all assists with homelessness prevention.				
Additional Burdens Funding	New Burdens total 2017-2020 £82,666		Spend on various initiatives including staffing and commissioning services				
Flexible Homeless Support Grant	Total 2017-2020 £695,833		Spend on various initiatives including staffing and commissioning services				
Other MHCLG grant(s)							
New Homes Bonus							
Other (please list) MSDC Rent in Advance and Deposit Guarantee Scheme	£8000 Deposit Guarantee	MSDC	The Rent in Advance and Deposit Guarantee Scheme are in place to assist households to				

£17,000 Rent in Advance	access the private rented sector.
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Grant funding provided by Mid Sussex District Council			
Provider	Level of funding	Project / Usage	
	(Annual or one off)		
Worthing Churches	Funding from WSCC & ESCC rough sleeping bid. For 2018-2019 £20,902. Future funding uncertain. Further joint bid to MHCLG planned for 2019-2020 or potentially MSDC funding from FHSG	Work with Rough Sleepers to provide advice and assistance to enable such clients to improve their housing circumstances and secure accommodation.	
CAB - Homeless Prevention & Money Advice Service	£31,740 funded through FHSG	Dedicated service to prevent homelessness through provision of debt & money advice Referrals for this service come from HNT. Aims to minimise risk of clients losing their homes due to debt or budgeting issues.	

Briefing October 2018

<u>Homelessness Reduction Act 2017 – came into force on 3 April 2018</u>

National trends which led to the introduction of the Homelessness Act are:

- Increase in homelessness presentations over the last 3 years
- Increase in use of and length of stay in temporary accommodation
- Increase in households applying to join the Housing Register
- Affordability issues Local Housing Allowance Rate not keeping pace with private rented sector rents
- Housing Associations introducing stricter allocations criteria affordability checks

In summary the new Act places a number of obligations on Councils as follows:

- New legal obligations on English councils to provide meaningful help to all eligible households irrespective of priority need, to support people to remain in their current homes (where suitable)
- Extended definition of threatened with homelessness to within 56 days up from previous 28 days
- Assess and agree meaningful support by means of a personal homelessness plan if someone is homeless or threatened with Homelessness within 56 days, regardless of priority need status so long as they are eligible
- Take reasonable steps to help someone avoid homelessness the new prevention duty
- Take reasonable steps to help to secure accommodation for homeless for at least six months the new relief duty
- An expectation that applicants should cooperate with efforts to assist them
- New duty on public services to notify a local authority if they come into contact with someone they think may be homeless or at risk of becoming homeless

Some of the measures being adopted by Arun District Council are:

- Personalised approach as opposed to process led
- Continue to focus on Homelessness Prevention Work
- Partnership working with Housing Associations/Private Rent Sector to maximise available social housing
- Joint working with community services that provide housing support such as housing advice/ money advice

Background

Main measures introduced by the Act are set out below – giving a bit more detail and background to the overall new duties above:

- 1. <u>Definition of a person threatened with homelessness</u> moves from likely to be made homeless in 28 days to 56 days. Also includes a duty if they present with a valid section 21 notice that expires in 56 days (Section 21 notice used by landlords to evict tenants and gain possession of a property where tenants have not violated the terms of the tenancy agreement)
- 2. <u>Duty to provide advisory services</u> extends the general duty to provide advice and information free of charge, about preventing homelessness to any person in their local authority area. This should include advice and information on preventing homelessness, securing accommodation when homeless, the rights of homeless people or those threatened with homelessness, the help that is available from the local authority or others and how to access that help. It also requires advice services to be designed with certain vulnerable groups in mind. This includes care leavers, victims of domestic abuse, people released from prison or youth detention accommodation, former members of the armed forces, people leaving hospital and those suffering from a mental illness or impairment.
- 3. <u>Duty to assess all eligible applicants' cases and agree a personalised homelessness plan</u> regardless of priority need, where an eligible applicant is at risk of homelessness. Eg non-priority need households most likely to be single people or couples without children to be assessed and provided with more meaningful assistance if they are threatened with homelessness
- 4. The prevention duty Local authorities must take reasonable steps to prevent homelessness for any individual regardless of priority need, either assisting them to stay in current accommodation or helping them to find a new place to live. This works alongside the 56 day timing set out above helping applicants to avoid homelessness. Applicants have a right to request a review of a decision to end this duty (after 56 days)
- 5. The relief duty local authorities must take 'reasonable steps' to help homeless eligible applicants to secure accommodation for at least 6 months, unless they are referred to another local authority as they have not local connection to the authority they have applied to. This duty would continue for 56 days. Applicants have a right to request a review of a decision to end this duty (after 56 days). This help could be for example a rent deposit or debt advice.
- Duties to help secure accommodation interacts with the prevention and relief duties to give flexibility to assist by providing support and advice to households who would then be responsible or securing their own accommodation.

- 7. Deliberate and unreasonable refusal to co-operate sets out the actions an authority can take if an applicant who or homeless or threatened with homelessness, deliberately or unreasonably refuses to take the steps set out in their personalised plan. It sets out the procedures is an applicant who is homeless refuses, at the relief stage, a final offer of accommodation and clarifies that local authorities no longer owe the main homelessness duty to those who fail to co-operate. The overall focus being on prevention and greater parity of treatment for all households approaching homelessness.
- 8. <u>Local connection of a care leaver</u> makes it easier for a care leaver to show that they have a local connection with both the area of the LA responsible for them and the area in which they lived whilst in care if they were there for a continuous period of at least 2 years.
- 9. Reviews an applicant can request a review of their authority's homelessness decisions, so they apply to a number of the decisions that a LA might make
- 10. <u>Duty of a public authority to 'refer'</u> where such an authority (to be set out in regulations) considers that somebody they are working with is or may be threatened with homelessness they must refer that persons details (with their permission) to a local housing authority.
- 11. Codes of practice the Secretary of State will be able to produce mandatory codes of practice dealing with LA functions in relation to homelessness or homelessness prevention, including how they exercise and monitor their functions under 7 and staff training. It will also allow future codes to apply narrowly to specific councils. A code of practice must be approved by both Houses of Parliament before being issued.
- 12. <u>Suitability of private rented accommodation</u> LAs must ensure that certain standards and suitability requirements are met for vulnerable households in the private rented sector.

Briefing October 2018

Rough Sleeping Strategy – prevention, intervention, recovery – published 13 August 2018

Summary:

The Rough Sleeping Strategy sets out the Government's strategy for halving rough sleeping by 2022 and ending it by 2027. The intention is that it will refresh the strategy on an annual basis. Complex and wide ranging set of initiatives – need to look at the whole system

Explicit links with Homelessness Reduction with a renewed focus on local homelessness strategies, targeted prevention enabled by all parts of Government coming together, new welfare reform measures and a step change in the supply of secure and affordable housing is critical + increase in good quality supported housing, particularly for vulnerable people. Central and local government to work hand in hand with charities and business to prevent rough sleeping. Social Housing Green paper will be published

£100 million investment over next two years, but concerns about how much of this is new funding rather than being prioritised from existing budgets

Focus throughout the Strategy is understanding the issues that lead to rough sleeping and being able to address them before people are forced to sleep on the streets.

Three areas:

- Prevention Provision of timely support before someone becomes homeless including timely support to tackle mental health and substance misuse + helping those leaving prison to find sustainable accommodation. Support to rough sleepers to find work and live independently. Focus on performance and evidence and stronger accountability. But cross departmental effort to monitor the impact of actions should lead to more joined up approach, although joint planning not formalised. New health provision for rough sleepers. Wider work to reform the private rented sector
- Intervention a number of initiatives and additional funding. Key link to homelessness actions swift targeted support to help people already in crisis. New 'rapid rehousing response' to rough sleeping. Funding new navigators to guide rough sleepers through support systems.
- Recovery support to people to find a new home and rebuild their lives.
 Focus on support to move into sustainable accommodation essential to recovery from rough sleeping.

Actions/initiatives in the Strategy:

PREVENTION

- Working with LAs to update their local homelessness strategies by winter
 2019 which will be re-badged as homelessness and rough sleeper strategies
- Convening local agencies to improve accountability for ending rough sleeping
- Health and Wellbeing Boards to feed into the development of local strategies
- Ensure Adult Safeguarding Reviews are conducted when a person who sleeps rough dies or is seriously harmed
- Work with the LGA to develop by summer 2019 a package of sector led support for LAs
- Undertake research into workforce challenges and opportunities in Housing Options Teams
- Better data working towards an integrated outcomes framework for homelessness and rough sleeping services including inclusion of housing status in NHS data
- Request NICE guidance to support prevention work, integrated care and recovery across the NHS
- Fund research to inform improved hospital discharge services
- Support to prisoners who have been identified as being at risk of rough sleeping on discharge (£3 million over 2 years)
- Support to female offenders with multiple and complex needs
- Develop a quantitative predictive model of homelessness and rough sleeping which can be used to assess the impact of government policy and interventions
- Gather evidence around affordability in the private rented sector
- Develop policy options for post 2020 when the current Local Housing Allowance freeze ends

INTERVENTION

- The Rough Sleeping initiative will receive up to £45 million for 2019/20. Work will extend from the 83 LAs with the highest level to other LAs who demonstrate commitment to tackling rough sleeping.
- New funding to support people sleeping rough to access local services
- £17 million of new funding for a new Somewhere Safe to Stay pilot in 15 locations around the country
- In partnership with LAs and other providers a review of hostels commencing in Spring 2019
- Government work with the sector to deliver new training to the hostel workforce
- £5 million to help local areas develop support for non-UK nationals who sleep rough

- A rough sleeping support team providing targeted case work to support and resolve the immigration status of non-UK nationals
- £2 million in health funding to enable access to health and support services

RECOVERY

- From autumn 2018, there will be an evaluation of the Housing First pilots in Liverpool, Manchester and the West Midlands, informing wider roll-out.
- The government will explore an exemption from the Shared Accommodation Rate for the three government-backed Housing First pilots
- £50 million of the government's recent £100 million Move-On Fund will shortly become available to areas outside England, with the launch of a prospectus by Homes England. Bids will be for both the capital funding to build homes and the funding to provide tenancy sustainment support
- £135 million from dormant accounts the majority being spent on housing for vulnerable people, and the rest on new models of community funding.
- A new Supported Lettings Fund of up to £19 million, which will fund flexible support and tenancy sustainment in homes provided exclusively for people who sleep rough.
- A review of housing-related support services commencing in September 2018
- The £20 million Private Sector Access Fund, which was announced in the 2017 budget, will be focused on supporting schemes that help single homeless people and families
- A new fund to support the set-up of local lettings agencies, to provide homes and advice for people who are homeless or at risk of homelessness
- £1.2 million of outcomes payments for the Rough Sleeping Social Impact Bond programme
- A new programme of work involving Jobcentres: a work coach homelessness expert to act as a single point of contact in every Jobcentre

Appendix 4 - Housing Related Support Consultation themes:

Just over 700 people responded to the on line consultation. Almost all (97%) were critical of the proposals. A breakdown of responses is shown in the table below:

	Critical	Supportive	Neither	Total	Total %
Residents	357	4	14	375	52.01%
Service users	143	0	0	143	19.83%
Staff	113	0	1	114	15.81%
Organisations	89	0	0	89	12.34%
Total	702	4	15	721	
Total %	97.36%	0.55%	2.08%		100%

Breakdown of respondents by age:

Age	No	%
15 or under	1	0.14%
16-24	34	4.72%
25-34	91	12.62%
35-44	116	16.09%
45-54	162	22.47%
55-64	129	17.89%
65-74	66	9.15%
75-84	14	1.94%
85+	2	0.28%
Prefer not to say	17	2.36%
Not Answered	89	12.34%
Total	721	100.00%

Key issues mentioned by respondents include the following points:

- It appears that not enough research or investigation as to impacts and outcomes has been carried out by WSCC and no long term business case has been set out.
- Proposals are short sighted that offer a false economy which will result in higher costs at a later date for West Sussex County Council statutory services as well as that of partners such as Police, NHS, Probation etc.
- Cuts will result in increased levels of risk for individuals and communities, higher crime rates, increased substance misuse, increased suicide risk, increased early death.
- Cuts will have a negative impact and increase the levels of risk to the most vulnerable and least heard in West Sussex such as; the homeless and those at risk of homelessness, women and children subject to domestic violence, young people, those with metal health and substance misuse issues.

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- ItePm (\$\frac{\text{posAppendix}}{\text{dicts}} recent central government policy to half homelessness by 2022 and eliminates it by 2027, and are ill timed given that homelessness is already increasing.
- Cuts will result in a loss of expertise in the sector, reputational damage for WSCC and a negative impact on the relationship of WSCC and the VCS.
- There should be an increase in funding not a reduction. Money could be saved elsewhere or council tax could be raised and ring-fenced for this. There should be a phased approach to funding reduction.
- Cuts will result in redundancies and job losses for many highly committed staff who are employed in these services.

Some respondents felt that not enough information had been provided to allow them to a make an informed judgement.

Respondents provided a rich range of accounts of how and why the supported housing sector is valued. A large number of very personal testimonies were received from current or former service users. Others came from those working in the wider health, housing and social care sector based on experience of working alongside the services concerned. A representative selection of a few of these responses is provided below.

"The Money Management Team has helped my clients on numerous occasions and the impact has been extremely positive to their wellbeing and financial outcomes.

They have the expertise to understand how to navigate debt agencies and financial bodies and have an in depth knowledge of grants and charities who are also able to provide assistance. As this is not my area of expertise I would not have been able to support my clients with their financial difficulties to the same high standard. The benefits that their support has given include reducing anxiety, providing education on financial matters and budgeting and preventing homelessness to mention a few. I feel that this service provides support to some of West Sussex's most vulnerable individuals and I have not yet come across another service of this type who could engage with and support them. **WSCC Social Worker**

"I am a Chartered Accountant with considerable experience in controlling costs and managing budgets. Although I am not a user I am both a church leader in the County and involved in a voluntary capacity in several initiatives working with the vulnerable. I am firmly of the view that while cutting support will give short term savings these will be outweighed by the long term costs, in both financial and human terms and am therefore opposed to the proposed cuts". Community Volunteer Advisor

'....we also think there is a real risk around a loss of voluntary sector expertise and capacity around housing and homelessness - If we don't fund the voluntary sector - There won't be one. Voluntary sector organisations can and do fund-raise and bring in considerable additional funding into the sector to support people in housing need. But without baseline statutory funding this potential to bring in more funding is lost. There is a very real risk that the whole sector will be undermined". Chief Executive of Mental Health Charity

The support _____ has provided to those suffering from a serious mental illness at the rehab unit I nurse at is invaluable. Without this support our clients would like be unable to leave

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hospital, which will increase institutionalization and prevent them from regaining Appendix 4 confidence and independence. This will increase already strained bed pressures with in the NHS. Our vulnerable clients are likely to end up on the streets thus increasing their chances of relapse and therefore putting their lives at risk. **NHS practitioner**

"I lead the discharge team at _____ Hospital. Every one of our patients who is identified as homeless or vulnerably housed is referred to one or more of the services that it is proposed to cut the funding of.

The Homelessness Reduction Act requires that we now use a duty-to-refer form for each patient, but the work carried out by services such as ______ for our inpatients (assistance with benefits claims, provision of evidence for eligibility for housing, making accommodation habitable etc.) will not be picked up in a timely manner by the local council housing departments, who have no extra staff to do so. These patients will therefore remain in hospital unnecessarily or be discharged to the street, without the specialist support to gain the accommodation that they need and to be able to function in it.

Provision of accommodation from providers such as _____ will be reduced, as a result of staffing reductions if the proposed cuts go ahead. This will result in the complex and chaotic clients that require this accommodation being turned down, as their needs will no longer be able to be met by the providers. Instead they will remain longer in a costly acute hospital bed that they have no need of, preventing patients who do require acute care from accessing it.

Day services from the above providers' hubs are also likely to be reduced. For many homeless people the hubs are their only access to medical and nursing care, mental health support and food and warmth. Failure to provide these will result in increased attendances at A&E, increased pressure upon mental health services and increased admissions to hospital with conditions directly attributable to living on the street and not having access to basic care, food and warmth.

I am bemused that the government announced its rough sleeping strategy in August 2018, with the aim of halving the levels of rough sleeping in England by 2022 and ending it altogether by 2027 - the proposals of WSCC seem to be the polar opposite of the government strategy, and will surely increase levels of rough sleeping and all of the negative consequences of that situation. " **NHS Practitioner**

The following statements are representative of responses received from service users:

"I am a vulnerable adult with mental health and alcohol dependent, I was sectioned back in August last year _____ and whilst I was there unfortunately was served a section 21. I was supported straight away by a housing support officer who helped liaise with the council, housing benefits and my landlord to avoid my eviction.

When I was discharged I was then assigned over to another support worker in order to help me live as independently at possible , to help sort out my bills , my benefits and make sure the appropriate referrals are sent to CGL and other agency's for debt support , due to the debt I got into when my mental health deteriorated .

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I am textil Gaffepipen wiit A mental health as of course this doesn't go away but I don't know where I would be [without] housing support. I feel I am able to cope more now and although I still have some way to go, I feel if I didn't have their support i would have ended my life by now...." Service User

"When you are faced with debt and eviction and benefits letters that do not make sense to any regular person a link like _____ is vital for the prevention of homelessness" **Service User**

"If my support stops, I won't be able to carry on my journey into independent living. I value the time and effort my support worker puts in to helping me with my bills and benefits and would be lost without her" **Service User**

This organisation has been invaluable for our family. My brother is currently living here and has been for the last 6 month. Due to difficult circumstances he found himself homeless and with the help of our local council was recommended here. They provide him with a safe home which is clean and warm. It is not just this though, various life courses are run to help people get back on their feet. Most of these people are vulnerable and do not have any other support. There are people here who look out for them and other residents to converse with. Some of these people have never had anyone to guide them in life, through which you and I might think are normal tasks and behaviors. This is there only life line, it is much more than just a roof over their heads." Family Member of Service User

"I have been having support from Southdown to support me to move from a hostel to a housing association property. I struggle with reading and writing and my support worker helped me complete forms and apply online for universal credit. I would not have been able to do this myself. I am having support to set up new home and utilities and to budget my money so I won't go into debt. If the service wasn't was there I would not have been able to do the move and this would have put me and my children at further risk of homelessness. It is a valuable service for vulnerable people to help them in times of crisis and support them to become more independent." **Service User**

"I was struggling to pay bills, manage my housing benefit (big arrears), understanding my benefits and maintaining my tenancy. ____ accepted me onto their supported housing scheme which provided me with the support I needed to get myself back on track. They did this by helping me fix my benefit situation - helping me start my universal credit claim, this then affected my housing benefit which Southdown helped me get started again and backdated. Also Southdown have helped me understand my tenancy e.g. responsibilities, upkeep and by helping me access the ____ (Food Bank) when I was struggling with money."

Service User

Health and Adult Social Care Select Committee 12 December 2018

Statement by the Leader of the Council and the Cabinet Member for Adults and Health

As part of the documentation to the Members of the Committee, we think it is appropriate to make a statement regarding homelessness.

No one wants to see people sleeping rough, particularly during the winter period. Homelessness is a complex issue and we know that it can happen to anyone. We, like everyone else, want to see the eradication of homelessness and therefore fully support the Government's recently published strategy as a good way forward.

The Government has rightly recognised that homelessness must be addressed, and has set ambitious targets to halve rough sleeping by 2022 and eliminate it in its entirety by 2027. We know that no one group will be able to achieve this on their own; it needs collective agreement to work together to really make a difference for our homeless on the streets of West Sussex. We applaud the formation of the Coalition as a good way forward and are exceedingly grateful to all the charities for the work they are doing and we are committed to work with them to achieve a reduction in, and the eventual eradication of, rough sleeping.

However to make headway we need a homelessness strategy for West Sussex, as advised by the Government. At present, with the exception of Adur and Worthing, new homelessness strategies have yet to be prepared by district and borough councils. We believe that a county-wide approach will be particularly important as housing and homelessness services are provided by district and borough councils whilst other key services, such as social services, are delivered at county level. We at West Sussex County Council are very willing to help prepare and support a county-wide homelessness strategy; however we are cognisant that this is for the housing authorities to lead. With a strategy in place we will be able to move forward by working together for those who need our help at a critical time in their lives.

The County Council recognises and respects that it is for district and borough councils to take the lead in undertaking homelessness reviews and developing homelessness strategies, as housing authorities, now that the Homelessness Reduction Act is in place. However, as the Social Services Authority, we are keen to play our part in working with our districts and boroughs to develop a consistent, pan-West Sussex approach to preventing and tackling homelessness. We look forward to working collaboratively with districts and boroughs to improve outcomes for our residents.

Louise Goldsmith, Leader Amanda Jupp, Cabinet Member for Adults and Health



Cabinet Member for Adults and Health	Ref No: AHxx (18/19)
December 2018	Key Decision: Yes
Local Assistance Network budget	Part I
Report by Executive Director Children, Families, Health and Education and Interim Director of Adults' Services	Electoral Division(s): All

Summary

As part of the Council's budget proposals consideration has been given to aims and responsibilities underpinning the Council's expenditure. In September 2018 the Cabinet Member decided to consult on the implications of proposals for a reduction in the Local Area Assistance (LAN) budget from £807,000 to £200,000 per annum. The LAN is a discretionary grant provided to support individuals in times of short term crisis and hardship. It is delivered through a partnership with voluntary sector agencies which provide assistance, very largely on an 'in kind' basis

The scheme was launched in 2013 when funding for discretionary welfare provision was transferred from the benefits system to local government and 'ring fenced' for this purpose. The 'ring fence' was removed in 2015 and since then funding must be drawn from the Council's base budget.

In October WSCC began a stakeholder engagement exercise in order to gather views regarding changes to the service in the light of a proposed reduction to the LAN budget from April 2019. This process has informed the proposals that are now being put forward to restructure the investment within a revised financial envelope. These proposals prioritise investment that support Council Statutory duties and provide relief to individuals in the most immediate crisis. The remaining investment is used to offer some strategically targeted support that will enable the providers to make best use of other options to access alternative resources.

In summary the revised allocation will continue the existing level of allocation to the food banks and Children and Family Centres and make a reduced contribution to the Citizens Advice offer and social enterprise providers.

West Sussex Plan: Policy Impact and Context

The LAN contributes to the West Sussex Plan objective for Stronger Communities. This proposal is one of several strategic proposals being put forward as part of the County Council's 2019/20 budget process.

Financial Impact

This proposal delivers a financial saving of £607,000.

Recommendation

The Cabinet Member for Adults and Health is recommended to approve a reduction in the budget for the LAN from £807,000 to £200,000 per annum from 2019/20 onwards and a remodelling of the remaining service that:

- Maintains support to Children and Family Centres supporting the Council's statutory duties to provide an early help offer. Ensuring that the remaining offer is targeted.
- Maintains support to foodbanks targeting individuals and families with the highest level of need.
- Reduces the contribution to Citizens advice, recognising that the Council
 provides other funding to this service, but accepting the importance of
 maintaining a specific targeted LAN offer focused on locally based face to
 face services to the CA's which already has extensive locations across the
 County.
- Reduces the contribution to social enterprises.

PROPOSAL

1. Background and Context

- 1.1 The Local Assistance Network (LAN) was established in 2013 when the Department of Work and Pensions abolished a number of discretionary elements of the benefits system, and transferred the responsibility for providing discretionary assistance to Local Government. A 'ring fenced' grant was provided to the County Council for two years. Since 2015 funding for the LAN has been funded from the Council's base budget.
- 1.2 The principle behind the LAN is to provide discretionary services to households facing hardship as a result of a crisis or emergency. Typically this involves provision of food, utility top ups, furniture, white goods or household equipment. No financial assistance is available although, in some circumstances, providers offer low value supermarket store cards to purchase essential items. There are no eligibility criteria.
- 1.3 LAN grant funding currently offers support to four types of services: Foodbanks, Children and Family Centres, Citizens Advice and Social Enterprise Providers. A full breakdown of the LAN schemes can be seen at appendix one.

2. Proposal Details

2.1 Recognising the Council's significant financial challenge and the predominantly discretionary nature of the LAN there was a proposal to reduce expenditure from £807,000 to £200,000 per annum from April 2019. In September 2018 the Cabinet Member agreed to consult on the implications of these proposals.

- 2.2 Consultation has focused on a fundamental re-appraisal of the way the scheme works. During the course of the discussions that have taken place with providers and stakeholders a number of consistent themes emerged;
 - The importance of developing 'networks' in which agencies are encouraged to collaborate and assist service users to navigate their way between different services
 - The importance of providing opportunities for people in crisis to access 'face to face' support within an accessible local setting
 - The value of preventing destitution amongst vulnerable households which would arise from lack of access to basic items such as food and fuel (utilities).

The advantage of the LAN approach, which builds on the capacity of existing providers and avoids unduly complicated eligibility criteria or application protocols, is regarded as effective in delivering assistance to households most at risk. Proposals for the future aim to retain these strengths.

- 2.3 In consideration of a reduced LAN, investment must be prioritised according to need and potential vulnerability and crisis situations. On this basis there is a proposal to maintain funding levels to support Food Banks and the Children and Families centres.
- 2.4 The remaining grant will be used to support a reduced targeted local offer within Citizens Advice, which will focus on signposting and a contribution to social enterprise providers' infrastructure.

Food Banks

- 2.5 The eight Trussell Trust Food banks¹ provide good local access points from which applicants can seek help. Food banks provide assistance to households for a limited period based on a voucher referral system. Seven of the eight Trussell Trust Food banks currently receive funding through LAN. This funding is used to support the basic infrastructure of these services, e.g. premises and storage facilities, enabling the services to access to additional sources of revenue and resources to support the overall food bank offer.
- 2.6 In a reduced LAN, the food banks will help to retain an accessible base from which assistance can be provided in most of the larger towns in West Sussex with the potential to also meet needs of individuals living in outlying communities through volunteers. There is also some potential for widening the range of services which can be accessed through Food Banks, for example to debt advice and money management. It is therefore proposed to maintain LAN funding for food banks at the current level.

Children and Family Centres (CFCs)

2.7 The County Council has statutory responsibilities to children and families. CFCs provide a good local base where help can be provided through face to face interactions. The CFCs' LAN role within both Crawley and Littlehampton

¹ Chichester, Bognor Regis, Littlehampton, Worthing, Shoreham, Haywards Heath, Horsham and East Grinstead.

is especially important. By continuing to support the provision of practical assistance through CFCs the Council will be maintaining a crisis offer for families with children. This provides essential support such as furniture, white goods, baby equipment, clothing, sometimes food, etc. It is therefore proposed to maintain LAN funding to CFCs at the current level. Given the significant savings that are being made elsewhere in the LAN budget, it is recognised that pressure on CFCs is likely to increase. This will need to be addressed as part of the implementation plan to ensure that the resources are focused on prioritising the highest level of need.

Citizens Advice (CA)

- 2.8 The Council already provides funding to support the general 'core' CA service in West Sussex with the LAN being an additional revenue stream. There is significant overlap in the support provided though the LAN, for example with benefits advice, debt and money management and the core CA offer. However, feedback from consultation has highlighted the significant benefit of providing locally accessible face to face support for some individuals who struggle with an on line offer and therefore there is a case for continuing with some additional investment which is specifically targeted at LAN priorities.
- 2.9 In response to this it is envisaged that CA would continue to receive a reduced amount of LAN funding which would support some focussed provision for LAN service users, rather than this be absorbed in a more general CA offer. This will involve supporting LAN clients to find alternative sources of help from either the statutory or charitable sector. Given the overall reduction in the budget it is envisaged that this would reduce by approximately 50% from the current allocation of £72,000 p.a.

Social Enterprise Providers

- 2.10 A substantial proportion of the current LAN funding is allocated to five charitable organisations who between them provide the core LAN in respect of utility top ups, furniture and white goods². Between them these providers received £555,000 in the current year amounting to 71% of allocated funds. These providers have developed services based on a social enterprise model, which in most cases complements their core charitable purpose. Much of this pre-dates the establishment of the LAN; for example involving recycling of donated furniture or provision of work experience for residents living in supported housing etc. LAN funding has enabled this provision to expand to meet a wider range of needs which in appropriate cases might involve the provision of more expensive items such as basic 'white goods'. Last year 799 households were provided with white goods by LAN providers.
- 2.11 There is no doubt that this role is extremely valuable especially in the case of households moving into new homes; perhaps following a domestic breakdown or other emergency. However as this service predates LAN investment and is underpinned by charitable furniture services it is suggested that alternative funding sources may be available to continue this in different ways at local level, albeit at a significantly reduced level. The reduction will mean these services are unable to provide the miscellaneous

² Stone Pillow, Turning Tides, Crawley Open House, Horsham Matters, Furnihelp

services. For children and families some needs can continue to be met within the CFC offer, but for single people and childless couples, the capacity to assist will be much more limited. Feedback from consultation has suggested that whilst these Social Enterprise providers are likely to continue to offer some services, a small amount of LAN grant to support some of the infrastructure costs, e.g. storage and transport, would significantly enhance this capacity

- 2.12 It is therefore proposed that some funding to the social enterprise providers is maintained albeit at a substantially reduced level. The purpose of the remaining funding would be to support the retention of some core capacity to and enable providers to attract support from other stakeholders. It is envisaged that this would not amount to more than £50,000 across the whole County. Clearly this would not be sufficient to support the continuation of a basic furniture service nor would it provide any white goods, however it should support these social enterprises to meet some infrastructure costs, e.g. storage and transport, which will allow the continuation of independent furniture collection and distribution schemes.
- 2.13 Work is required to develop an implementation plan. The significant milestones to ensure delivery can be seen in the table below:

Date	Activity	Lead Officer
December 2018	Cabinet Member Decision	Executive Director Children's, Adults, Families, Health and Education (Kim Curry)
By end of January 2019	Discussion with providers regarding the implications of the proposed changes	Director of Adults Services (Paul Mckay) and Director of Communities (Rachel North)
By end of March 2019	Updated SLA	Director of Adults Services (Paul Mckay) and Director of Communities (Rachel North) Paul Mckay
April 2019	2019/20 budget reductions implemented	Director of Adults Services (Paul Mckay) and Director of Communities (Rachel North)

FACTORS TAKEN INTO ACCOUNT

3. Consultation

3.1 The consultation process opened on 3rd October 2018 and closed on 3rd December 2018. Key stakeholders, service providers, local authorities, elected members and members of the public were encouraged to participate through a number of different mediums that included;

- An on line survey via the West Sussex County Council website. All survey documents were made available in easy read formats and printable form that could be submitted in person or by post
- A dedicated e-mail address for representations
- Meetings with Officers and the County Council Cabinet Members for Adults and Children's Services respectively

Participation

15 service providers formed a Provider Coalition to develop a combined response to the budget proposals (for both LAN and Housing Related Support). The Coalition held five meetings which were attended by the County Council lead officers for the consultation process and one by the Cabinet Member for Adults & Health.

- 101 responses were received to the online survey questionnaire
- 5 e-mail responses were received by the dedicated e-mail address for the consultation
- 4 submissions were received from LAN provider partners (see 3.2 below). A briefing was given to all District & Borough Council Housing Needs Officers and to the Department of Work & Pensions Partnerships Manager
- Individual meetings took place with 11 service external providers, in addition to collective meetings with the wider Provider Coalition
- 3.2 An analysis of the consultation responses and the impact analysis can be seen in Appendices 2 and 3. Detailed responses from providers involved in the LAN are available as Background Papers.

4. Financial (revenue and capital) and Resource Implications

- 4.1 The current budget for services provided through the LAN contracts is £807K and supports services across the county. This is funded from the base Council budget. The scale of the financial challenge facing the Council across the entire range of services means that all financial commitments have to be tested and challenged.
- 4.2 In 2019/20 it is envisaged that the LAN budget of £200,000 would be distributed broadly in line with the figures shown below, based on the prioritisation of the Council's statutory duties and targeting support at individuals and families most in need. Individual allocations to agencies would be agreed as part of the Implementation Plan referred to in 2.12.

	2018/19 LAN allocations £000s	2019/20 Proposed LAN allocations £000s
Food Banks	35	35
Citizens' Advice	72	35
Children & Family Centres	80	80
Social Enterprise Providers	555	50
Store Cards	32	-
Other & unallocated	33	-
Total	807	200

Revenue consequences of proposal

	Current Year 2018/19	Year 2 2019/20	Year 3 2020/21	Year 4 2021/22
	£m	,	£m	£m
		£m		
Current budget	£0.807	£0.807	£0.2	£0.2
Proposed change		-£0.607	-	-
Remaining budget		£0.2	-	-

5. Legal Implications

- 5.1 The County Council does not carry any statutory responsibilities for the relief of destitution save where this is a factor connected with the responsibilities for children in need (individually or within their family) or adults with social care needs. The County Council recognises the benefits of supporting measures which contribute to the prevention of more acute needs from those who are vulnerable or at risk of falling into circumstances requiring more significant support or intervention. The allocation of funds has therefore been focused on addressing this issue with funding maintained for those services that support statutory duties and prioritise individuals and families most in need.
- 5.2 Current levels of financial support have been provided through Service Level Agreements with various agencies and voluntary partners. Through the consultation on proposals and future implementation of the changes the Council will work closely with these other organisations to jointly manage their impact and mitigate adverse impact on those whose support will be reduced.

6. Risk Assessment Implications and Mitigations

6.1 The key risk arising from the reduction in the LAN involves the extent to which the absence of services which have hitherto been available results in displacing needs to other services which are subsequently harder or more costly to meet. There are three broad kinds of provision which account for the majority of the LAN spending: food, fuel (utilities) and household equipment/furniture. The table below shows how risks in each of these areas will be managed or mitigated.

Provision	Risk Mitigation
Food	Funding in this area is not proposed to reduce. The Food
	Bank network is strong and can be sustained
Utility Top Ups	Approximately £20,000 p.a. is spent on these. This funding
	will be wrapped up in the allocation to CFCs to ensure that
	existing capacity to support this service to families with
	children is maintained.
Household Equipment &	Provision for this will significantly reduce albeit some
Furniture	capacity will continue to exist through CFCs.
	Potentially there are opportunities to mitigate the loss of
	this provision through other solutions. Examples of this
	could include: Furniture Reuse via Social Enterprise or the
	provision of Furnished Tenancies via Social Landlords,
	whose tenants are generally the beneficiaries of LAN
	funded items

7. Other Options Considered

7.1 A brief summary of the four main options considered is shown in the table below.

Option	Reasons for Selection or Rejection
Maintain existing 'network' but prioritise the funding maintaining statutory	This is the recommended option since it maintains an overall offer to households in crisis across all parts of the County and at the same time retaining a priority focus on
functions and support to food banks.	the needs of families with children.
Focus funding through a smaller number or a single provider	Advantages of scale and efficiency would be outweighed by the loss of a local service in all parts of the County. Elsewhere discretionary welfare schemes based on remote application processes have proved unsuccessful.
Maintain funding at existing or higher level than proposed	This is not considered to be sustainable given the pressures on statutory services and the Council's financial resources and the discretionary nature of the services involved
Remove funding completely	WSCC's investment in LAN helps to prevent reliance on other services and helps to build community resilience by supporting social enterprise and independent voluntary initiatives which might otherwise be less effective or unsustainable. This should be sustained to the extent it remains viable to do so.

8. Equality and Human Rights Assessment

- 8.1 The County Council has a duty under Section 149 of the Equality Act 2010 ('the Act') to have due regard in the exercise of its functions to the need to: eliminate discrimination, harassment and victimisation and the need to promote equality of opportunity for those that share a protected characteristic and those who do not.
- 8.2 The proposal will involve the remodelling of the Local Assistance Network and corresponding reduction in services available for households in crisis situations. Some help will continue to be available with food and utility top ups but access to furniture and white goods will significantly reduce. The impact of these changes in relation to those with protected characteristics is as follows

8.3 Summary Equality Impact Assessment

Careful assessment has been made of the individuals, groups and communities who use or benefit from the LAN funded services, informed by the consultation process and data collated. This has considered how those with particular protected characteristics may be affected by the proposals. Attention has been given to any elements of the services which can be considered to be of particular interest or benefit to such groups or individuals

by reference to their identity with such protected characteristics. In summary it is not considered that any of the LAN funded services aim to or can be seen as supporting those with any of these characteristics more than others with similar needs and it has also been concluded that the proposed changes to the focus of LAN support will not adversely or unduly affect any particular group so identified. The possible impact on reducing equality of opportunity for those with and those without protected characteristics has been included in that assessment.

9. Social Value and Sustainability Assessment

9.1 Almost all of the organisations which participate in the LAN are third sector, not for profit organisations. These organisations provide additional social value to West Sussex by attracting additional inward investment in the form of public grants and charitable fundraising as well as social capital in the form of volunteering and campaigning activity. Part of the aims of the remodelling and implementation of the LAN funding will be to maintain these benefits as far as can be achieved, working with these organisations at a local level and collectively.

10. Crime and Disorder Reduction Assessment

10.1 Within the overall impact assessment consideration is given to whether there is any quantifiable risk that the reduced availability of crisis led funds and support will lead to an increased risk of crime and disorder. Whilst there is no direct correlation it is an aspect of the plans for implementation which will require some further attention.

Kim Curry

Dave Sargeant

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Interim Director of Adult Social Care

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Appendices

Appendix one: Analysis of LAN spend 2017/18 & Allocations 2018/19

Appendix two: Consultation feedback and impact assessment

Background papers:

'Finding Help in a Crisis' WSCC LAN leaflet https://www.westsussex.gov.uk/media/5101/local_assistance_network.pdf

Analysis of the use of Food Banks in West Sussex: WSCC Insights https://public.tableau.com/profile/matt.gover#!/vizhome/Foodbankv2/Foodbank-Chichester?publish=yes

Horsham Matters: Response to Consultation on LAN

West Sussex Coalition of Providers: Impacts of Proposed WSCC Cuts to the Housing Related Support and Local Assistance Budgets

<u>Local Assistance Network consultation response from Citizens Advice in West Sussex</u>



Appendix 1

ppendix 1							
Local Assistance Network; Summary of Use 2017/18 & Allocated Funding 2018/19							
Household Composition of Applicants*	No.	LAN Providers	Service users 2017/18	Funding allocated 2018/19			
Single	2,661	Citizens Advice	712	72,000	Countywide		
Couple	615	Children & Family Centres	1512	80,000	Countywide but significant spend in Crawley		
Single Parent Family	1,161	Crawley Open House	550	80,000	Crawley		
Two Parent Family	708	Furnihelp	383	60,000	Mid Sussex		
Total Applicants	5,145	Horsham Matters	604	100,000	Horsham (also provides Trussell Trust Foodbank)		
		Stone Pillow	715	130,000	Chichester and Bognor		
Total - forms of assistance	e provided	Turning Tides	550	185,000	Worthing, Adur & Littlehampton		
Clothing	76	Misc Others	119		Find it Out, Probation.		
Food	2,415		5,145	707,000			
Furniture	910	Supermarket store cards		32,000	Provided through CA & other non funded agencies		
Travel	437	Trussell Trust Foodbanks	Users				
Utility Top Up	1,199	Bognor	1091	7,500			
White Goods	799	Chichester	779	6,000			
Total	5,836	East Grinstead	753	7,000			
		Haywards Heath	337	6,000			
None- declined	87	Littlehampton	554	4,000			
Signposted elsewhere	694	Shoreham	452				
		Worthing	945	4,000			
* Figures exclude Foodba	nks listed s	separately	4,911	34,500			

Appendix 2: Local Assistance Network Budget: Impact Assessment & Mitigations

Assistance Type	Numbers Affected 2017/18	Impact of Changes Proposed	Mitigations
Provision of Food	7,300 cases	 Maintenance of existing funding to Food Banks, so no change Reduction or withdrawal of pre-paid supermarket cards: this will reduce the capacity for immediate help as service users are likely to have to wait for Food bank opening days 	Local networking to ensure that Food Banks have capacity to meet need including flexibility to respond to those living in more rural & isolated communities
Furniture and Household Goods	910 cases	 Significant reduction of grant to 'Social Enterprise' providers will greatly reduce capacity to provide free goods Some providers may discontinue this activity Likely to impact mainly on low income households moving into unfurnished social housing 	 It is likely that some charitable capacity will remain in the market 'second hand furniture market. Not least because there are already some providers offering this service without LAN funding. Potential exists for providers to continue attracting some funding & assistance via local arrangements with social landlords or other stakeholders
Provision of White Goods	799 cases	 It is unlikely that provision of new white goods will form part of the LAN offer in future, perhaps with the exception of a few exceptional cases Groups affected by this will primarily be those moving into unfurnished social housing or moving home as a result of an emergency 	 A limited number of other sources of grants for these kind of goods are available Budgeting loans may also be an option for some applicants The potential exists for Social Landlords to grant furnished tenancies including which could include provision of white goods
Emergency Travel Needs	437 cases	Capacity to assist will reduce	 Provision in this area varies considerably, to some extent reflecting DWP and LA housing practices Potentially some of these demands should be met elsewhere; however more work will be required in this area.
Utility Top Ups	1,199 cases	 It is envisaged that this will continue to be available through Children & Family Centres Capacity to assist single applicants without children will be limited 	Potential to approve some 'top ups through the CA network

Clothing	76 cases	This is a relatively small area in terms of numbers	 Capacity exists to 	provide second hand
		of applicants	clothing to meet r	many needs. Bespoke
			needs may be me	t through Children &
			Family Centres	

1. Equality Duty

1.1The aim of the duty is to enable improvements in outcomes for people with protected characteristics. The protected characteristics are:-

age	religion or belief	
disability	gender reassignment	
race	sexual orientation	
sex	pregnancy and maternity	
	marriage and civil	
	partnership	

- 1.2 The Duty requires us, when taking any decision, to undertake an assessment of whether there is an opportunity to help achieve three positive outcomes. This is done by ensuring the decision maker has due regard to the need to
 - eliminate discrimination, harassment and victimisation;
 - advance equality of opportunity; and
 - foster good relations between persons who share a protected characteristic and those who do not.

Due regard means giving conscious thought to these aims when taking any decision and when gathering information in preparation for the decision.

1.3 In accordance with the Council's approach to the Equality Duty it will consider positive steps to remove disadvantage and encourage people who are disadvantaged to participate in public life or in anything where their participation is low; acting to promote understanding between people with protected characteristics and others. The weight given to these

considerations as part of any decision will depend upon how much the decision could affect equality of opportunity and fairness. It is a need to:

- be aware and show awareness of the Duty
- apply your mind to it before and whilst considering a proposal
- exercise the Duty with rigour and with an open mind
- have sufficient information on which to base the assessment
- maintain a review of the impact and effects of the decision
- be able to show how all of the above was done
- 1.4 The work being proposed to review arrangements against the outcomes aimed for and the responsibilities to be met will include information to explain what effects the decision will or could have such as data on the characteristics of residents and customers potentially affected by the proposals. The feedback from the consultation will provide additional data and indications for this exercise and the process will identify where this data is relevant and reliable for this purpose.
- 1.5 Where the information and any impact assessment suggest adverse impacts upon one or more of the protected groups the assessment will address -
 - what is the extent and nature of the impact
 - what actions can be taken to mitigate the impact and how
 - whether such actions are proportionate to the aims
 - how much time may be needed and whether to alter the proposal
 - whether are other options available that would have less impact
 - whether is it proportionate to implement the decision proposals
- 1.6 In summary, in implementing the proposals and through the joint work planned every effort will be made to ensure we have and understand information on the impact of particular proposals on groups with protected characteristics.
 - Will such people be affected more than the general population?
 - Will the effect be to reduce their opportunities or quality of life?
 - In either case what is the nature and extent of the impact?
 - Can more be done to eliminate or reduce the impact?
 - If so is it still right to go ahead with the proposal?

Application to Proposals

- 1.7 It is proposed that the Council allocates funding for LAN to ensure delivery of the defined targeted aims and prevention to avoid increased demand pressure in other areas.
- 1.8 The data captured from work with partners and the feedback from the consultation will be examined and analysed within the approach set out above and a record retained of how the aims have been considered in the implementation plan. This will be managed with reference to the equality impact approach described above. The partner agencies will hold data in relation to current and past service users and the overall profile of service users in terms of the focus or intended groups or range of needs their service is intended to meet. Equally the evaluation of current funding and how it will be applied or withdrawn and how that process will be achieved will take account of whether any disproportionate impact is likely in terms of those with protected characteristics and the other equality responsibilities described above.

Appendix 3. Analysis of Local Assistance Network Consultation

The overwhelming majority (88%) of responses were critical of the proposal. Respondents who opposed the budget reduction frequently expressed views that:

- Savings are a false economy, as cuts will result in higher costs at a later date for West Sussex County Council and other statutory service providers such as the NHS and D&B Councils.
- Cuts will increase levels of risk for vulnerable individuals especially at a time of change within the benefits system and the introduction of Universal Credit
- Budget savings should not be made at the expense of the poorest members of the community
- The value of the existing service to those who have depended on it.
 There were only three responses from people who had used the LAN, but many more from individuals who had had some first-hand experience of the LAN either as volunteers or referrers.

A summary of responses from the on-line survey is shown in the table below.

	Critical	Supportive	Neither	Total
Residents	68	5	5	78
Service users	3	0	0	3
Staff	14	0	0	14
Organisations	8	1	2	11
Total	93	6	7	106

The following comments are typical of those received:

"I have been referring people to the LAN for a number of years through roles in the local community. I recall helping a young single mother who had an autistic son to get a reconditioned washing machine. She had significant debts and was not able to replace her machine herself. She had a number of Provident loans as well as items she was paying for through Brighthouse. Without the help of LAN I feel sure she would have increased her debt further to secure a replacement". Food Bank Volunteer

"I understand that with a drastically reduced Revenue Support Grant, unless it takes the politically difficult decision to increase Council Tax, the Council needs to make budget cuts. However cutting the budget for this discretionary assistance which is only available when there is hardship as a result of a crisis or emergency will hit the most vulnerable residents when they are most in need. In the context of a benefit freeze since 2015 and the challenges many claimants face/will face making the transition to Universal Credit, it seems inconceivable that there will be any reduction in the number of households that need this assistance. There can be no grounds to believe that household crisis events will reduce so, unless there is absolute certainty that some alternative assistance from the private/charitable sector will fill the gap, if a 75% cut is made to the budget it can only be in the knowledge that it will leave many households facing extreme hardship and misery". **Church Group Leader**

"Most people we are supporting cannot work because they have long term and enduring mental health needs which impact on their ability to sustain employment and they rely on state benefits to live. Changes to benefits - Around the introduction of PIP universal credit have left many of our services users going through periods without an income at all. Our service users often don't have savings which they can use (having been out of work for a long time) or better off relatives to turn to for help and the LAN funded services are essential to provide a safety net of basic help in these circumstances for these people.

Without the current level of LAN support we consider that our service users and their families (who are already among the most vulnerable and impoverished in our society) will experience even greater poverty. The stress associated with this will impact on the mental health of individuals which in turn will lead to even greater pressure on local mental health services".

Chief Executive of Mental Health Charity

A number of respondents were critical of the consultation process and said they did not have enough information to form a view one way or the other.

A small number of respondents (6%) were supportive of the proposal. Comments in support of the proposal tended to express support for the scheme in principle but agreed that it should be reduced in line with the County Council's overall budget.



Cabinet Member for Adults and Health	Ref No: AHxx (18/19)
December 2018	Key Decision: Yes
Minimum Income Guarantee for Working Age Adults	Part I
Report by Executive Director Children, Adults, Families, Health and Education and Interim Director of Adults' Services	Electoral Division(s): All

Summary

The Care Act 2014 requires local authorities, for people receiving publicly arranged care and support, that they have sufficient money to cover day-to-day living costs. Up until now, the County Council has set its level above the statutory minimum set by the government; this was to reflect the view that these customers were more likely to require more money to meet their social needs on top of their day to day living costs. In view of the financial situation facing the County Council this concession can no longer be afforded and so the proposal is to reduce the Minimum Income Guarantee for those of working age in line with the statutory minimum.

West Sussex Plan: Policy Impact and Context

A council that works for the community. The change will make arrangements for assessing customer contributions equitable between different client groups, generating additional income that will help the County Council manage the financial challenges that it is facing.

Financial Impact

This proposal will result in working age adults contributing in the region of an additional £0.4m per year towards the cost of their social care. Some of this will accrue to the Clinical Commissioning Groups in West Sussex because it will impact upon pooled budgets. The benefit for the County Council will be in the region of £0.3m per year.

Recommendation

The Cabinet Member for Adults and Health is recommended to approve the Minimum Income Guarantee for those working age adults who require a financial assessment of customer contributions who are receiving County Council arranged care and support other than in a care home, be based on the statutory amounts with effect from 8th April 2019.

PROPOSAL

1. Background and Context

1.1 Under the Care Act 2014 people who receive local authority-arranged care and support are required to pay a means-tested contribution towards the cost of that care. This is determined by a financial assessment. For customers who do not live in a residential care home, the County Council is obliged to ensure, as part of the process of calculating the contribution to their care costs, that individuals have an amount of money sufficient to cover day-to-day living costs. This amount is known as the Minimum Income Guarantee (MIG). Charges cannot reduce people's income below that figure, though local authorities can allow people to keep more of their income if they wish. Historically the County Council has applied MIG at the statutory minimum for older people, but has allowed a more generous level for adults of working age.

2. Proposal Details

- 2.1 The County Council's application of MIG could be seen as inequitable in that a concession is made for customers of working age but not for older people. While this was possible to justify in the past, the nature of the financial challenge facing the County Council makes its continuation much harder to support. Consequently it is proposed to end this concession with effect from 8th April 2019 by bringing the MIG allowance for working age customers receiving County Council arranged care and support other than in a care home in line with the statutory minimum. This will result in those who are assessed to make a contribution towards the cost of their care paying more.
- 2.2 The precise effect of this will depend on a number of factors, including the level of the MIG which Government sets for 2019/20. This is likely to be announced early in 2019. It is expected that the result will be an increase for a single person of around £5 per week and £8 for the very small number of customers who have a couple's financial assessment.
- 2.3 The overall approach described in this report has been discussed and agreed by the West Sussex Leaders' Board as part of a wider discussion on strategic budget options.
- 2.4 Following the Cabinet Members decision; then all customers who are in receipt of care and of working age will be informed of the decision. It is anticipated this letter will be issued in early January 2019.

FACTORS TAKEN INTO ACCOUNT

3. Consultation

- 3.1 Consultation on the proposal has taken place between 1st October and 3rd of December 2018.
- 3.2 The County Council consulted with customers who would be potentially impacted by this decision, Customer and Voluntary groups representing the cohort of customers potentially impacted, as well as seeking views from the wider community. The result of the consultation is contained within the appendices.

4. Financial (revenue and capital) and Resource Implications

4.1 Revenue consequences of proposal

Assessment of financial contributions will remain means-tested and any customer whose income is below the level of the MIG will not be required to pay a contribution towards their care costs. The County Council has around 2300 customers of working age, but the composition of that group is not static. Consequently a completely precise budget impact cannot be stated at this time, since this will depend on multiple factors:

- Customer means
- The number of customers
- Disregards that are agreed for approved household expenses, Disability Related Expenditure and Enhanced Disability Premium.
- The statutory minimum published by Government for 2019/20

In addition it is important to note that within Learning Disabilities and Working Age Mental Health part of the benefit will accrue to the local Clinical Commissioning Groups because of the impact on pooled budgets.

Consequently it is important that the overriding reason for this decision is seen as establishing a principle with respect to the application of MIG for working age adults. While it follows that the additional income which will be generated will only become apparent in time, the likelihood is that this will be its effect, based on the customer cohort as it has existed.

	Current Year	Year 2	Year 3	Year 4
	2018/19 £m	2019/20	2020/21	2021/22
		£m	£m	£m
Revenue	N/A	4.3	4.3	4.3
budget				
Change from	N/A	0.4 of which	0.4 of which	0.4 of which
Proposal		0.1 would	0.1 would	0.1 would
		arise for the	arise for the	arise for the
		CCGs	CCGs	CCGs
Remaining	N/A	4.6	4.6	4.6
budget				

4.2 The effect of the proposal

Although the position is subject to inherent variability, around 1700 working age customers are potentially estimated to be affected. For those who are single, the outcome could be that they are charged around an additional £250 per year towards their care costs and £400 for those who have a couple's financial assessment.

4.3 Future transformation, savings/efficiencies being delivered

An ongoing £0.3m saving is assumed will be achieved for the County Council.

4.4 Human Resources, IT and Assets Impact

There will be no impact in these areas.

5. Legal Implications

The Care Act 2014 states:

Because a person who receives care and support outside a care home will need to pay their daily living costs such as rent, food and utilities, the charging rules must ensure they have enough money to meet these costs. After charging, a person must be left with the minimum income guarantee (MIG), equivalent to Income Support plus a buffer of 25%.

Local authorities should consult people with care and support needs when deciding how to exercise this discretion. In doing this, local authorities should consider how to protect a person's income. The government considers that it is inconsistent with promoting independent living to assume, without further consideration, that all of a person's income above basic levels of Income Support or the Guarantee Credit element of Pension Credit plus 25% is available to be taken in charges.

Local authorities should therefore consider whether it is appropriate to set a maximum percentage of disposable income (over and above the guaranteed minimum income) which may be taken into account in charges.

The proposals are consistent with that requirement.

The MIG allowance figures or allowances are provided as part of an annual notification issued by central government as to the amount of the MIG. The reason this information is provided to ensure the statutory offer is clearly identified for all customers and identifies the amounts allowed for both those under and over 65 years of age.

6. Risk Assessment Implications and Mitigations

The key risk identified was around the quality of the consultation and the effectiveness of the engagement with stakeholders. There has been a good response to the consultation and therefore this risk has been mitigated; the response to the consultation is contained within the appendices.

7. Other Options Considered (and Reasons for not proposing)

At this stage no other options are being considered.

8. Equality and Human Rights Assessment

8.1 The Equality Act requires the Council to promote equality and to eliminate discrimination, paying particular regard to the need for equality of opportunity for those that share a protected characteristic and those who do not.

- 8.2 The proposal will align the local discretionary decision between those of working age and those over 65 years old. However it is recognised the annual MIG allowances are more generous to those over the age of 65 years, than those of working age. This is because the MIG is one element of the totality of regulations which affect those of working age.
- 8.3 An Impact Appraisal is contained in the attached appendices.
- 9. Social Value and Sustainability Assessment

None.

10. Crime and Disorder Reduction Assessment

None.

Kim Curry

Dave Sargeant

Executive Director Children, Adults, Families, Health and Education

Interim Director of Adult Social Care

Contact Officer: Deborah Robinson, Lead Adults Service Improvement.

Appendices: This report is accompanied by (to follow);

- The Equality Impact assessment (appendix one)
- The consultation feedback, including an overview and detailed analysis (appendix two and three)

Background papers: None



Equality Impact Report (Appendix 1)

Title of proposal	Minimum Income Guarantee (MIG) for Working Age Adults		
Date of implementation	8 April 2019		
EIR completed by:	Name: Tel:	Deborah Robinson, Adults Service. Tel: 0330 22 28413	

1. Decide whether this report is needed and, if so, describe how you have assessed the impact of the proposal.

An equality impact report is needed due to the potential financial and emotional impact of the proposal on people who use our services and on their families and carers and because it has the potential to have a disproportionate impact on people with protected characteristics – in particular people with a learning and/or physical disability or mental health issues. It is also required because of the need to ensure any other potential impact is understood and taken into account in terms of how these proposals fit in the wider context.

The wider context is the recent and on-going review of the whole benefits system, particularly as it impacts those who are disabled. This has highlighted the differing views (of Government and also research and academic bodies) about what constitutes a minimum income.

Additionally there are organisations which identify the living costs for those who are disabled to be higher than those who are not disabled. While the financial assessment service disregards disability related expenditure (DRE) as part of the financial assessment, this brings into focus how the DRE is determined.

2. Describe any negative impact for customers or residents.

The Council recognises that some people may experience a level of anxiety during the consultation and decision-making period, with some being more susceptible than others, for example, people with learning disabilities and those with mental health issues. The Council, therefore, took care to engage with a broad range of stakeholders to clearly explain the proposals and respond to questions during the consultation period which included opportunities for face-to-face discussion within focus groups and various meetings. (See appendix 3 which has details of the consultation).

The impact caused by a potential increase in the amount people have to pay towards their care, could affect their participation in work, education, training or recreation, social and economic wellbeing.

The mitigations to possible adverse impact include:

- ➤ To ensure that the information and advice regarding budgeting and managing money is widely available and easily accessible.
- Information to be made available to all in the wider health and social care system who provide advice and support to people affected. This would include voluntary and community sector organisations and also local social prescribing teams as this would assist GPs in advising patients with associated stress and anxiety.
- > The financial assessment services to ensure the Welfare Benefit Advisers are available to ensure all benefits are maximised.
- > The financial assessment service to clarify how Disability Related Expenses (DRE) are allowed, what information is required to support the expenses claimed in advance, as

Agenda Item 6

Iterth6sc happendixpact on the financial assessment and how much a customer has to contribute to their care.

- WSCC to work with local communities to increased access to online information, advice and resources
- WSCC to approach local businesses in relation to their social responsibility ethos to strengthen/increase opportunities for people of working age with disabilities to move into employment

3. Describe any positive effects which may offset any negative impact.

The Council recognises that the impact of the proposal may increase the amount of money people contribute towards the cost of their care and, therefore, they and their families and other stakeholders, may not feel that there are positive effects of the change.

It is hoped that the mitigating actions listed in section 2 above can, as far as possible, offset some adverse impacts.

4. Describe whether and how the proposal helps to eliminate discrimination, harassment and victimisation.

Careful consideration is being given to equalities legislation during the consultation to ensure that people with protected characteristics and those who may be disproportionately affected by the proposal were identified and invited to share their views. Their views have been taken into account in the development of the final recommendations.

5. Describe whether and how the proposal helps to advance equality of opportunity between people who share a protected characteristic and those who do not.

The proposal will align the MIG between those of working age and those over 65 years old. Currently those of working age have the statutory amount plus an additional allowance at the discretion of WSCC, while those over 65 years of age receive the statutory amount.

While it is recognised the annual MIG allowances are higher to those over the age of 65 years, than those of working age, the MIG is one element of the financial assessment regulations.

Adults' Services operations involve working with people on a day-to-day basis to ensure equality of access to services between people who share protected characteristics and others. Staff routinely take account of people's diverse needs when delivering support to ensure services are as equitable as possible and any barriers identified and removed.

6. Describe whether and how the proposal helps to foster good relations between persons who share a protected characteristic and those who do not.

The proposal may be perceived as neutral regarding the fostering of good relationships between this group of customers and the wider public although for this group of people their social life and opportunities could be considered by them, to be reduced when compared with the wider public. Attention will needed to be given to identify any such impact.

Feedback from a wide range of stakeholders, many of whom share protected characteristics and some who do not, has been used to inform the recommendation.

Consultation participation rates from people in Black Asian and Minority Ethnic communities have historically not been as high as the Council would wish. This is a continuing theme which Adults' Services works hard to address. Channels are in place to facilitate continuing, and indeed, increased, engagement with under-represented groups, for example via the countywide Minorities Health and Social Care Group which has representation from a wide range of community groups and through the network of local community groups.

7. What changes were made to the proposal as a result? If none, explair WAy. Appendix 1

The proposal to reduce the MIG for working age adults to the statutory amount as provided by central government has not been changed. This is because the Council needs to make decisions as how it can meet the range of needs and statutory responsibilities within the available Adults care budget while endeavouring to minimise the impact across all of the different groups who use the Adults care services.

What has been considered are the potential mitigations (question 2 above) to manage any impact.

8. Explain how the impact will be monitored to make sure it continues to meet the equality duty owed to customers and say who will be responsible for this.

The impact of the proposed change will be evaluated via our financial monitoring processes and through existing engagement channels with people who use our services and other stakeholders, including Healthwatch West Sussex.

If the proposal is agreed and a Cabinet Member decision taken, an action and communication plan will be created. This plan will be monitored by Deborah Robinson (Adults' Services).

To be signed by a Director or Head of Service to confirm that they have read and approved the content.				
Name	Dave Sargeant Date 6 Dec. 2018			
Your position Interim Director Of Adults Services				



Cabinet Member for Adults and Health	Ref No:
December 2018	Key Decision:
Results of the Consultation for the Proposal for the Minimum	Part I or Part II:
Income Guarantee (MIG) for Working Age Adults	Part 1
(Appendix 2)	
Report by Executive Director Children, Adults, Families,	Electoral Division(s):
Health and Education and Interim Director of Adults' Services	All

Overview of the Results from the Public Consultation.

The consultation for the proposal to reduce the Minimum Income guarantee (MIG) for those of working age was held between 1 October and 3 December 2018.

All customers who may be affected by the proposal were contacted using a postal survey, with Easy Read versions for those who required them. An online version of the survey was also available in the Have Your Say area of the WSCC website.

In total, over 2000 postal surveys were issued with a strong return rate of 25%. 727 responses were received in total, of which 560 were returned by post and 167 on line. In addition, a number of letters and emails were received in response to the survey and these were included in the feedback.

There was concern raised by members of the Health and Social Care Select Committee that we may not receive responses from those living in more remote areas of the county and, therefore, we issued all potentially affected people with the survey and provided pre-paid envelopes. In addition, focus groups were held with nine organisations and groups over the consultation period with a total of 11 sessions involving 189 participants, (see the table at 8.1 contained in the main body of the analysis).

Due to the strong response and engagement methodologies used we are able to combine a high level of both quantitative with rich qualitative data.

Headline Results from the Consultation

From the results of the survey the headline statement are as follows.

- ➤ The majority of respondents were not in favour of the proposal: 67% disagreed, with 10% of respondents agreeing.
- > The majority of the respondents, 71% felt the impact would be negative, but 8% of respondents felt there would be no impact with 5% feeling there would be a positive impact.

- At 53% the majority of respondents felt the level of impact would be serious, 27% felt there would be some impact, and 6% felt there would be a minor.
- At 64% nearly two thirds of respondents use adult social services with 73% having a disability and 33% of these people having a learning disability.

Between 14% to 20% of people who were personally affected answered that they did not know how the proposal would affect them.

For those against the proposal the following comments were repeated throughout the consultation.

- The consultation is expensive and not required as the decision has been made. Money better spent on the service.
- The wider context of the recent and ongoing national review of benefits has meant a reduction of monies for many people. This proposed reduction is, therefore, another loss of allowances or benefits experienced by the same cohort of people i.e. the disabled.
- ➤ The Disability Related Expenditure (DRE) process is not considered clear or transparent. It was also felt that the assessment process was unclear, it was not certain how long the process would take, what the outcome might be, or that the outcome would be correct.
- National research was referenced or supplied as part of the responses. This included the additional cost incurred by being disabled, the health implications, the identified needs to live a full life for those people who have learning or disability needs.
- > The Healthwatch West Sussex report on the financial assessment service was also referenced as part of the response to the consultation.
- ➤ The MIG figures for the over 65 years are higher than those under 65 years and, therefore, the proposal to reduce the level, for those of working age would lead to inequality of treatment, in practice, if not in process.
- West Sussex is an expensive place to live and, therefore, any reduction in allowance was felt more by those on a low income. This cohort of people had little chance to work to improve their income and, therefore, there was a perceived increased risk of hardship and debt being incurred.
- Carers emphasised that they were providing care which already saved money for the County Council so this was seen as another saving. Due to the fragility of some carers a risk of carer break down was raised.
- > Family members stated they would have to contribute more so that their relative still had the same opportunities.

- Providers observed that affected people might reduce their social activity reporting that this was already the case for some people. People also reported that they would have to cut out or reduce their social activity, such as attending groups or meeting friends, and this would potentially impact on their wellbeing and independence.
- ➤ It was reported by providers and families that people assessed with eligible social care needs were not taking up their full support because they could not afford their contribution. It was feared this would increase with any further reduction in income or allowance.
- ➤ It was reported from several group meetings that people had issues managing their budgets which was causing stress. It was felt that the proposed change may impact both people's social life and on their ability to pay living expenses.
- The draft Adults' Services Vision and Strategy emphasised the importance of community-based services for its future sustainability and it was felt that the MIG proposal could undermine peoples' ability to access support in the community.

For those who supported the proposal it was felt this was a modest amount to contribute towards care and reluctantly justified given this period of austerity.

Questions were asked regarding how neighbouring Councils treat those of working age when deciding what MIG they should provide. We have checked with Hampshire, East Sussex and Surrey County Council, Brighton and Hove City Council and all offer the statutory MIG for those of working age and have done so for some time.

Alternative Approaches or Mitigations

There were also common suggestions made by respondents.

- > The County Council should lobby Government for additional funding for Adult Social Care
- > Increase the Council tax precept for Adult Social Care.
- Cut waste within the Council
- Greater flexibility in support planning and funding in order to increase/reduce levels of support over time, as necessary, to avoid providing more support than a persons assessed need. Linking this with financial assessments to ensure care contributions were accurate.
- More advice about benefits, budgets and savings and debt recovery could be helpful, as would information about the benefits process.
- Information upfront as to the level of evidence required to support DRE claims would be helpful.
- Work with local business to create more job opportunities or work experience.
- > Implement a transition period if the proposal is agreed.



Cabinet Member for Adults and Health	Ref No:
December 2018	Key Decision:
Detailed Results of the Consultation for the Proposal for the Minimum Income Guarantee (MIG) for Working Age Adults	Part I or Part II: Part 1
Report by Executive Director Children, Adults, Families, Health and Education and Interim Director of Adults' Services	Electoral Division(s):

1. Introduction

- 1.1 This report provides an overview of the findings from the public consultation on the proposed change to the Minimum Income Guarantee for working age people.
- 1.2 The consultation period ran from 1 October to 3 December 2018. It was principally conducted through an online and postal survey and focus groups. Additional submissions were also received during the engagement period, by letter, telephone and email.

2. Online and postal survey

- 2.1 2,217 people potentially affected by the proposed change were contacted by post with a survey asking them for their views. This included an Easyread version of the letter and survey for people with learning disabilities. All postal surveys included a pre-paid envelope enabling them to be returned at no cost to the respondent.
- 2.2 An online version of the survey was also issued on the County Council's 'haveyoursay' platform. This also included links to an Easyread version.
- 2.3 Of the 727 survey responses received, 167 were completed online and 560 were returned via post, giving a strong postal response rate of 25%.

3. Overview of people responding to the survey

3.1 As per **Fig 3.1**, nearly two thirds of respondents (64%) used adult social care services, whilst just under one quarter (23%) were a relative of someone

who used adult social care. This total included 8% of people who also personally used adult social care services.

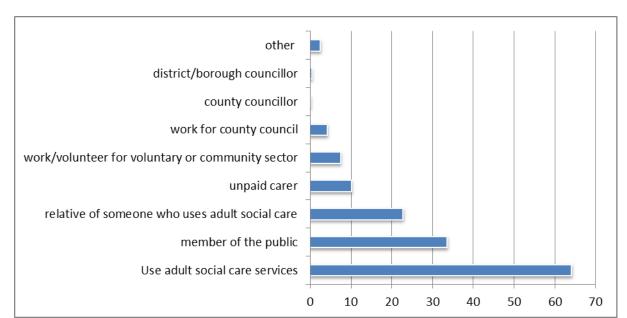


Fig 3.1 Which of the following describes you? Select all that apply (%)

3.2 73% of respondents defined as having a disability. As **Fig3.2** shows learning disability (33%), physical impairment (23%) and long-term illness (16%) were the most frequently reported disabilities.

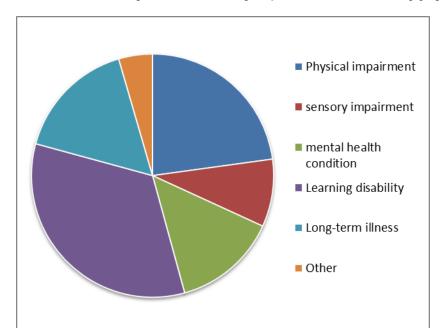


Fig 3.2 Please state what your disability is, select all that apply (%)

3.3 43% of respondents were male, 50% were female and 3% preferred not to say. 4% did not provide a response. **Table 3.1** provides a breakdown of respondent age group.

Table 3.1 Which of the following age groups best describes you?

Age Group	%
16-24	7
25-34	17
35-44	14
45-54	20
55-64	22
65-74	9
75-84	1
85+	0
prefer not to say	3
not answered	9

- 3.4 Of those who responded to the question on ethnicity, 91% were white British. All other ethnicities comprised 5% of responses, with only 'white and Asian' and 'Any other white background' reaching 1%. 4% of people preferred not to give their ethnicity and 5% did not answer the question.
- 3.5 58% of respondents were heterosexual, whilst 2% were gay or lesbian and a further 2% were bisexual. 6% defined as 'other', 10% preferred not to say and 23% did not answer the question.
- 3.6 One respondent was currently serving in the armed forces, whilst 2% had previously served. 91% had never been in the armed forces and 6% did not answer the question.
- 3.7 Responses were received from across the County, as shown by respondent postcode areas given in **Table 3.2**. 4% of people chose not to answer this question.

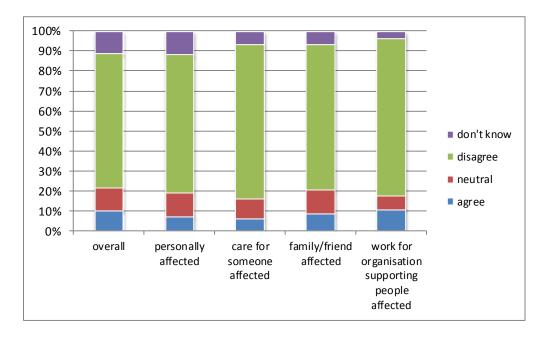
Table 3.2 Respondent post code areas and numbers responding (West Sussex post codes only)

BN6	BN16	PO10	RH10	RH16	GU29
<i>3</i>	<i>31</i>	6	<i>37</i>	<i>15</i>	<i>10</i>
BN11	BN17	PO18	RH11	RH17	
<i>38</i>	<i>31</i>	3	<i>37</i>	<i>4</i>	
BN12	BN18	PO19	RH12	RH19	
15	9	<i>46</i>	<i>55</i>	<i>12</i>	
BN13	BN42	PO20	RH13	RH20	
27	2	29	28	11	
BN14	BN43	PO21	RH14	GU27	
<i>46</i>	9	65	<i>11</i>	2	
BN15	BN44	PO22	RH15	GU28	
20	<i>5</i>	<i>35</i>	<i>30</i>	<i>4</i>	

4. Views about the proposed changes

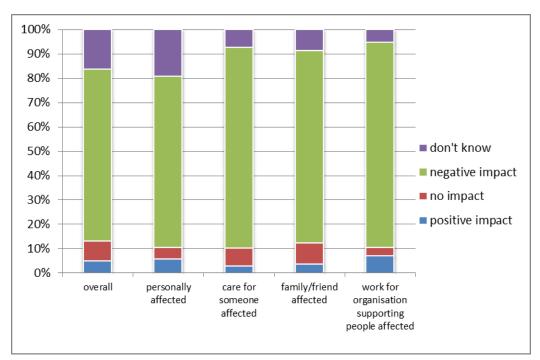
4.1 As **Fig 4.1** shows, 67% of people overall who responded to the question disagreed with the proposal, whilst 10% agreed. There was a high level of disagreement with the proposal in all responder groups.

Fig 4.1 Which of the following statements best described your view of the proposal? By responder group (%)



4.2 Similarly, as shown in **Fig 4.2** a large majority (71%) of people responding to the question felt the proposal would have a negative impact, whilst only 5% felt it would have a positive impact. People personally affected were slightly less likely to view the impact as negative (70%) than other groups as 19% did not know how it would personally impact them.

Fig 4.2 How do you think the proposal will impact on you, the person you care for or represent? By responder group (%)



4.4 As **Fig 4.3** illustrates, people responding to the question were concerned as to the potential severity of the proposal, with 53% overall believing it would have a serious impact, with only 7% believing that it would have a minor impact. At 52%, people personally affected were the only group lower than the overall figure. This is a result of the relatively high proportion of within that group who did not know how the proposal would impact them personally (16%).

100% 90% 80% 70% 60% 50% don't know minor impact 40% some impact 30% serious impact 20% 10% 0% family/friend overall personally care for work for affected someone affected organisation affected supporting people affected

Fig 4.3 If you think the proposal will have a negative impact, how serious do you believe this will be? By responder group (%)

5. Text box comments on the proposal

5.1 Some people supported the proposal and viewed it as a relatively modest reduction. Some argued that it made sense to bring the level into line with the nationally-set minimum or felt it was reluctantly justifiable given the ongoing funding constraints within public services.

"I believe that in the current financial climate the impact will be no more than the impact felt by others in need and is therefore sad but justifiable"

- 5.2 Some also agreed that there should be parity between people of working and pensionable ages and felt that it was wrong to assume that pensioners had lower costs.
- 5.3 A far greater proportion of comments focussed on the perceived injustice of the proposal. A recurrent theme was that people with disability did not choose to have their conditions or to need benefits and welfare support in order to live independently. One respondent felt that the proposal was a 'tax on disability' and many felt it offered an uncomfortable judgement on contemporary society:

"What does it say about our society that we can so penalise those who are among the least affluent in our society and have very real needs?"

5.4 It was noted that although the minimum income for people of pensionable age was currently set at a lower rate, owing to the nationally-set 'triple-lock', which guarantees that the state pension will rise annually by a minimum of 2.5%

meaning that pensioners actually received a higher minimum income than working age people, even though the latter was currently set 5% higher.

Quality of life

Cost of Living

5.5 By a considerably margin, the most frequent comments focussed upon the practical impact of a £5 a week reduction in available funds and how difficult this would be to manage within already very tight, inflexible budgets.

"I don't have enough money to live on now. I am totally hand to mouth every week & never have any money left if there is any problems or repairs etc. needed."

"It would be the difference between eating or heating and lighting the house"

"The church I attend often gives me a food parcel as I already struggle on existing income"

5.6 People were greatly worried about increased costs and their inability to cover them and in particular the risk that the proposal would lead to increased hardship. This worry had been exacerbated by the cumulative impact of previous reductions in eligibility, benefits and support alongside the high cost of living in West Sussex.

"If you squeeze any more money it would cause me great financial hardship"

5.7 As a result of these pressures, there was considerable anxiety about increasing risk of debt, or becoming unable to service existing debt. Similarly, people feared they would lose any, already slim, chance of saving any money.

"I am already challenged more than enough with my disability/illness. I work hard to manage my finances. This will put me in debt which would be incredibly depressing. It will push me over the edge"

Accessing support

5.8 People were also concerned that they would have less money to pay their contribution for the services they had been assessed as eligible for and would therefore take these up at a lower level, or stop them altogether.

"If this contribution is increased by £5 per week the numbers of vulnerable people with eligible needs not taking up support services will increase. This would result in needs, assessed as eligible, not being met; an increased burden on unpaid carers; an increase in reliance on informal support networks where vulnerable people at risk of abuse are not monitored by the local authority"

Wellbeing

5.9 As the above comment illustrates, respondents feared that the proposal would risk a considerable reduction in people's wellbeing. This was exacerbated as they would likely no longer be able to afford social and leisure activities or transport costs. This would lead to greater risk of isolation and loneliness.

"my eye-sight affects what I do as I am registered as partially sighted. I rely on taxis to attend a group at Buddy's. If you implemented this I would be unable to attend, leaving me socially isolated"

5.10 Overall, there was concern over the potential increase in stress and anxiety for people affected by the proposal and potentially deeply negative impacts on people's mental health and wellbeing.

"Already on low income, no other finances available. Would mean less day centre which could result in more isolation which will lead to being a mental health issue. (Self harming et.) And other health issues due to learning disability and mobility issues. Would impact all areas of life not in a good way. If I did live at home with parents I could not survive"

Impact on families and unpaid carers

5.11 Alongside the impact on people directly affected by the proposal, the potential impacts upon their families were also raised. People feared that there would be increasing care demands upon the family, as affected individual's lives were further constrained.

It would also be extremely stressful for me, as my daughter who is already suffering from depression, will become more unhappy and anxious if her options are reduced even further. She is likely to start her seizures and anxiety attacks again. I am in remission from cancer, and this will obviously impact on my health as well as hers, I already do a lot of support for her, due to lack of funds.

- 5.12 As the above quote illustrates, this risk was particularly great given the fragility of some families, as parents managed their own disabilities or additional needs. These families also often had limited overall incomes and would struggle to cover any reduction in weekly finances.
- 5.13 The proposal was also a source of anxiety for some elderly parents as it increased their worry as to how their child could maintain independence when they could no longer support them.

"as someone who has been caring for my son for going on 4 years and he is getting worse by the day there will come a point bearing in mind the fact I am 69 and ALSO DISABLED. I won't be able to care for him or worse case scenario I die and he has no one to help him or take over his care causes me great worry"

(Emphasis in original)

5.14 A recurrent theme was that the relatively small saving derived from this proposal was a false economy. This was largely as a result of its potential impact on the fragile balance many families struck in providing support to their relatives. Any disturbance of this could have costly ramifications for the whole social care system.

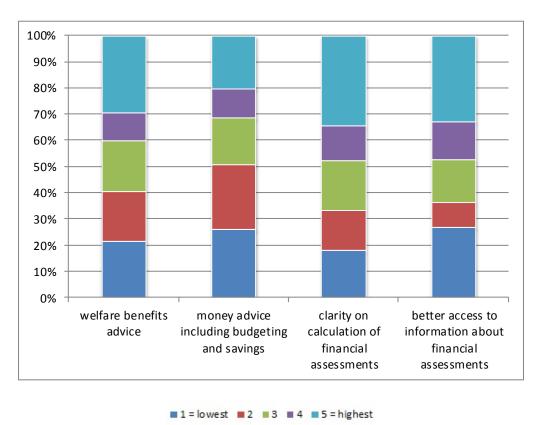
My son at 20 needs constant care + support 24/7. It is an arduous task + takes a strain on us all as a family. If the financial support is also cut then this will put further strain on us and if we cannot cope then this could jeopardise his life at home and if he were handed over to the authorities to care for then this would be at a very much higher cost than the contribution that is currently provided towards his care"

Alternative options

- 5.15 A number of alternative options were suggested for consideration in order to cover the saving covered by the proposal or to less its impact for affected people.
 - Building in a transition period for existing claimants. That the new rate should be bought in for new claimants and existing claimants should remain on the old rate, but not increased each year until the new rate was higher than the old rate due to inflation etc. This would reduce the immediate impact of a cut for existing claimants.
 - Means testing to exempt those on a low income from any change in the minimum level.
 - Reduce spending on other council services, such as road repair or community building projects, to maintain the funding.
 - Reduction in Council management costs
 - Council to lobby the government for extra funding in order to avoid cuts on disabled people or to remove the restrictions on raising council tax.
 - Cost of the saving should fall on residents more able to pay, this included raising council tax, or wealthier pensioners forgoing their winter fuel allowance.

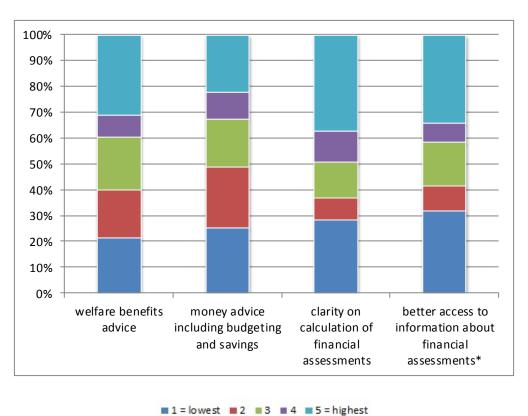
6. Potential Mitigations

Fig 6.1 On a scale of 1 to 5, with 1 being lowest and 5 being the highest, for far do you believe any of the following could reduce the potential impact of the proposal? Overall (%)



6.1 **Fig 6.1** shows that of all those responding, clarity on the calculation of financial assessments and better access to information about financial assessments were viewed as most potentially helpful with 48% of respondents selecting options 4 or 5 for both. As per **Fig 6.2**, people affected by the proposal reported broadly similar views of the suggested mitigations.

Fig 6.2 On a scale of 1 to 5, with 1 being lowest and 5 being the highest, for far do you believe any of the following could reduce the potential impact of the proposal? People personally affected by the proposal (%)



- * The Easyread version of the survey asked only the first three questions about potential mitigations. The data given in this column is drawn from users of adults' services who completed the standard survey only.
- 6.2 As **Fig 6.3** shows, in general people who would be personally affected by the decision were less likely than those caring for someone potentially affected or a family member or friend to be aware of local information channels. On average, 38% of people who were personally affected were aware of a channel, compared to 49% of carers and 46% of family members or friends.

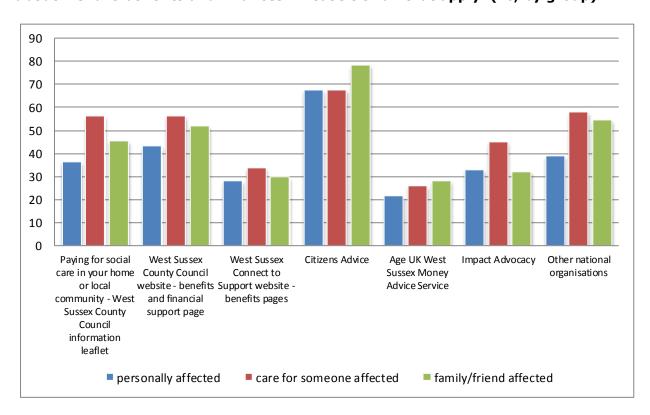


Fig 6.3: Are you aware of the following local channels of information and advice about welfare benefits and finances? Please tick all that apply. (%, by group)

7. Comments about potential mitigations

- 7.1 The most frequent comment was that the only way to mitigate the proposal was for it not to proceed. For some it was 'insulting to assume advice will replace funds'.
- 7.2 Similarly, many people felt that even if the suggested mitigations may potentially be beneficial, they could not cover the impact of losing around £5 per week.

"none of these would (make) any difference what so ever to my financial impact. I already am struggling financially. I am already in receipt of relevant benefit which are not going to better in fact if anything these will be reduced + make the situation even worse"

- 7.3 Some people noted that the suggested mitigations already existed and a number reported that they had already fully accessed them. Others argued that improvements to the effectiveness of existing support and advice should not be contingent on cutting people's support.
- 7.4 The financial assessment process currently used by the Council and its administration of Disability Related Expenditure (DRE) were also highlighted by a number of respondents as being overly complex and opaque. Some people strongly felt that it could be difficult to understand the reasons for decisions, or for staff to be able to explain them.

"In addition to regular, inexplicably varying contributions we are currently paying for an 'underpayment' which I had been unaware of and could not have known about. In fact I do not even know if this so-called debt is accurate as no explanation or apology has ever been offered."

"My son with significant learning difficulties has been assessed more than once in relation to making contributions to his care. He paid his contribution until he went to residential college then – despite writing twice – I have had no reply or transparent reason why or what his contribution should be from then on. I have stopped his contribution and emailed WSCC to say he would pay no more until we have had a new assessment – the silence has been deafening!"

- 7.5 Issues relating to the administration of financial assessments and disability related expenditure undermined the confidence of some people in the ability to roll out the proposal accurately and transparently. Issues relating to assessments and DRE were also discussed in the focus groups, at para 11.1.
- 7.6 Whilst some people did agree that the mitigations could potentially be useful, suggestions were also made to improve their effectiveness, these included:
 - specialist support for the families of people unable to claim for themselves
 - ensuring information was fully accessible
 - delivery of information and support services through community groups that people already attended, rather than requiring them to undergo a second conversation with Council staff.
 - Ensuring there is ongoing support for the people who would need help to maintain their finances over time.
- 7.7 One respondent argued that ensuring services were fully accessible and consistent for every disabled person across West Sussex 'would cost far, far more than the proposed saving'.

8. Focus Groups

8.1 Focus groups were held by nine organisations and groups over the consultation period, with a total of 11 sessions involving 189 participants. An overview is given in **Table 8.1** below.

Table 8.1 Focus Group Overview

Organisation	Date	Number of participants
Asperger's Voice	25 October 2018	7
Asperger's self-advocacy group.		
Asperger's Syndrome Self Advocacy West Sussex (ASSA)	14 November 2018	7
West Sussex County Council Adults' Services Customer and Carer Group	19 November 2018	6
Outreach 3-Way	21 November 2018	5
Learning disability and autism charity		
Aldingbourne Country Centre x 3	21-23 November 2018	60 (total)
Learning disability charity		
Worthing Speakabout	22 November 2018	15
Learning Disability self-advocacy group		
West Sussex County Council Adults' Cabinet Member Roundtable – workshop held at the Aldingbourne Country Centre learning disability charity	26 November 2018	70
Minorities Health and Social Care Group	29 November 2018	3
Capital Project Mental Health Trust	30 November 2018	16

9. Key themes

Views on proposal

9.1 Many people felt that they were being targeted as a result of their disability, and that this was unfair as this was outside of their control. It also meant that they were amongst the least able to absorb the impact of a higher contribution and were unlikely to be able to work to make up the loss

"It's wrong to take money from vulnerable people and make their lives more difficult and make them even more vulnerable"

- 9.2 Whilst the impact was generally viewed as negative for all those affected, it was also argued that it would not be felt equally and that people on smaller packages of care and with a higher degree of independence, would be most affected.
- 9.3 Overall, participants who were potentially affected by the proposal argued that those of working age had higher weekly costs than pensioners and the higher MIG level was justified. Some of those not directly affected disagreed and felt that it was discriminatory to assume that older people didn't need as much.
- 9.4 It was noted that pensioners benefited from the 'triple lock' which effectively guaranteed their income and meant that although their MIG was set at a lower level, the amount of income they retained was higher. Some argued that the pensioner MIG should be increased to 30% to ensure equity, rather than reducing the working age level.
- 9.5 It was also noted that whilst the MIG was calculated nationally, West Sussex was an expensive place to live and therefore people's living costs were higher than the national average and it was already a struggle for some to manage on their limited budgets.

Impact of the proposal on yourself or the person you care for

Budgeting, hardship and debt

9.6 It was consistently emphasised that £5 per week was a significant amount of money for those potentially affected and that loss of this would represent a considerable challenge when managing an already very tight budget.

"£5 may not sound much to you, but it's a lot of money to us, it might be half our total spending money for the week"

- 9.7 Further reductions to weekly budgets would mean that some people would have to make choices about whether to pay for food, heating or their support. Some equated the loss of £5 per week with the choice between having a meal or not.
- 9.8 The risk of incurring debt or becoming unable to manage repayments on existing debt was cited. Further, a potential increase in the use of foodbanks was also cited, as people may no longer have enough money to pay for all their food.

Accessing support and maintaining independence

9.9 Already, some people were not accessing support because they could not afford their required contribution and this situation would be further exacerbated by any increase in the amount people would have to pay. Some providers stated that this was already happening as a result of the proposal.

"It might stop people getting the training and support they need to get work, be happy or be more independent at home"

9.10 People worried that they would no longer be able to pay for transport to access social groups and activities and also that they would no longer have enough money to pay for social activities to meet their friends and attend the groups they relied on

"social activity settings are also vital for people to express themselves and relax and to talk to people about sensitive issues such as sexual health"

9.11 It was noted that this proposal was just one change amongst many, including changes to In House day services and Universal Credit and that the cumulative impact of these represented a significant challenge for many people's independence and wellbeing.

Personal safety and anxiety

- 9.12 Some people feared that if they could no longer afford to attend social groups and activities then they may have to 'wander the streets'. This led to concern over personal safety, with fears of being attacked or taken advantage of.
- 9.13 Fears over personal safety were a further example of the general anxiety expressed by people potentially affected by the proposal. This had been considerably aggravated owing to the layer of 'upset, anger and distress' which had resulted from the cumulative impact of previous reductions in support and changes to benefits. This had been further exacerbated by concerns over the potential impact of Universal Credit which, in combination with the MIG proposal, was very unsettling for a number of people.

"I was stressed, angry, depressed and upset last time you cut my support and benefits; I don't want it to happen again"

9.14 The change, and the stress of dealing with it, would also be particularly challenging for people with Autism and those with mental health issues.

10. Mitigations

- 10.1 Whilst more advice about benefits, budgets and savings and debt recovery could be helpful, as would information about the benefits process, for many people this would not be able to cover the practical impact of losing £5 a week.
- 10.2 A provider supporting people with learning disabilities noted that the Council provided some people with more support than their assessed hours of need and recommended that the assessment process was reconfigured to address this. They also suggested greater flexibility in support planning and funding in order to increase/reduce levels of support over time, as necessary.

- 10.3 Engaging with local businesses, through their corporate social responsibility, to provide equipment and create jobs and training opportunities for people with disabilities was also suggested. An appealing, mutually beneficial proposal would be needed to support any approach to businesses. One potential option was the creation of an ethical/social business award or mark that local businesses could sign up to.
- 10.4 Commissioning was also highlighted as a potential mitigation. The Council could use this as a tool to create a new market with business and the voluntary sector to integrate people into their local communities and employment, where appropriate.
- 10.5 If the proposal was approved then information should be made available to all in the wider system who provide advice and support to people affected. This included local social prescribing teams as this would assist GPs in advising patients with associated stress and anxiety.
- 10.6 Some queried why other groups with more money were not being asked to contribute more instead. Alongside wealthier residents, this also included Members and officers of the council, and it was suggested that their remuneration should be considered.
- 10.7 It was also suggested that a 'means test' should be applied on a case-by-case basis to determine who could afford to pay the higher rate.

11. Other comments

- 11.1 A persistent theme in the focus groups was the lack of clarity as to how the Council managed Disability-Related Expenditure. It was also felt that the assessment process was unclear, it was not certain how long the process would take, what the outcome might be, or that the outcome would be correct.
- 11.2 It was noted that the draft Adults' Services Vision and Strategy emphasised the importance of community-based services for its future sustainability, yet the MIG proposal could undermine people's ability to access support in the community.

12. Additional submissions

12.1 A number of additional submissions were received via post, telephone and via email during the period of engagement. These were taken into account in the findings analysis. These are summarised in **Table 12.1**.

Table 12.1 Overview of additional submissions

Individual or organisation making submission	Method of submission	Submission overview
Parent of person potentially affected by the proposal	Undated submission	Highlighting potential issues related to the application of the Minimum Income Guarantee by the County Council.
Person working with vulnerable adults	Via email, 3 October 2018	Outlining the current financial difficulties and their impacts on vulnerable people.
Parent of person potentially affected by proposal	Via email, 15 October 2018	Representation outlining opposition to the proposal and a number of alternative recommendations. Representation submitted on behalf of their child.
West Sussex resident	Via email, 16 October 2018	Comments regarding the application of the cost living to the MIG calculation.
Parent of person potentially affected by proposal	Call to CarePoint Contact Centre, 22 October 2018	To register opposition to the proposal
Individual completing the Easyread survey	Call to CarePoint Contact Centre, 24 October	Feedback on the negative impacts of the proposal on affected people.
		Also, queried the cost of producing Easyread materials.
Parent of person potentially impact by decision	Call to CarePoint Contact Centre, 25 October 2018	Suggestion to make savings by ensuring that people given housing owing to disability are eligible
		Also, discussed negative impact of demographic survey questions for some people and questioned whether they were necessary

Member of the public	Via email, 2 November 2018	Suggestion to increase council tax to meet required saving
On behalf of an organisation supporting people with learning disabilities	Letter to Cabinet Member for Adults and Health, 26 November 2018	Outlining a series of objections to the proposal, relating to its negative impacts on those potentially affected.
Learning disability charity trustee	Letter to Cabinet Member for Finance, 29 November 2018	Various comments regarding the potential negative impacts of the proposal on affected people
Parent of person potentially affected by the proposal	Via email, 30 November 2018	Outlining three reasons why the proposal should not be implemented and providing justification for an increase in the minimum income level for all adult social care service users.
Managing Director of Aldingbourne Trust	Letter to Cabinet Member for Adults and Health, 26 November 2018	Outlining a series of objections to the proposal, relating to its negative impacts on those potentially affected.
On behalf of Aspens Charities	Letter to Cabinet Member for Adults and Health, 26 November 2018	Outlining a series of objections to the proposal, relating to its negative impacts on those potentially affected.
Parent of person potentially affected by the proposal	Via letter, 28 November 2018	Outlining a series of objections to the proposal, on behalf of their child.
Parents of a person who may be affected by the proposal.	Via email, 2 December 2018	Representation outlining opposition to the proposal and its potential impact on their family member.

