

December 2017



CLINKS
RESPONSE

Clinks response to the Department for Communities and Local Government draft Homelessness Code of Guidance for local authorities

About Clinks

Clinks is the national infrastructure organisation supporting voluntary sector organisations working in the criminal justice system (CJS). Our aim is to ensure the sector and those with whom it works are informed and engaged in order to transform the lives of offenders and their communities. We do this by providing specialist information and support, with a particular focus on smaller voluntary sector organisations, to inform them about changes in policy and commissioning, to help them build effective partnerships and provide innovative services that respond directly to the needs of their users.

We are a membership organisation with over 500 members, including the voluntary sector's largest providers as well as its smallest. Our wider national network reaches 4,000 voluntary sector contacts. Overall, through our weekly e-bulletin Light Lunch and our social media activity, we have a network of over 15,000 contacts. These include individuals and agencies with an interest in the CJS and the role of the voluntary sector in rehabilitation and resettlement. Clinks also manages the National Criminal Justice Arts Alliance, which is the leading national network supporting the arts in criminal justice.

For more information see www.clinks.org

About this submission

Clinks welcomes the opportunity to respond to this consultation. We have mainly focused our submission on 'Chapter 23: people with an offending history', as this is of most relevance to the work of our members and aligns with our expertise.

We are supportive of the tone and language used within this chapter of the draft code of guidance and are especially pleased to see the people described as those who have an offending history, as opposed to offenders. It is positive that there is a specific chapter focused on the needs of this group, but there needs to be read-across between the guidance offered here and the guidance highlighted in the rest of the document. This is essential to avoid any confusion and ensure consistency.

To inform our response we have drawn on evidence gathered through:

- A scoping exercise conducted in partnership with Homeless Link which examined the impact of the Transforming Rehabilitation reforms on the accommodation outcomes for people in contact with the Criminal Justice System¹

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- Our work providing the chair and secretariat to a voluntary sector advisory group to the Ministry of Justice focused on exploring the barriers people in contact with the criminal justice system experience when trying to access appropriate accommodation.²

Clinks is also a member of Making Every Adult Matter (MEAM) coalition, alongside Homeless Link and Mind, formed to improve policy and services for people facing multiple needs. People with multiple needs face a combination of problems including homelessness, substance misuse, contact with the criminal justice system and mental ill health. They are likely to live in poverty and experience stigma, discrimination, isolation and loneliness. Homeless Link has responded to this consultation and we fully support their submission.

Q11: Taking chapters 1-5 of the Homelessness Code of Guidance which describe strategic functions consider the following questions:

- a. Having read these chapters are you clear what local authorities' responsibilities are?**
- b. Would you suggest any additions, deletions or changes to these chapters?**

Chapter 2 / Access to social housing, paragraphs 2.42 to 2.48

Clinks supports Crisis' recommendation that the government takes this opportunity to revise national policy on social housing allocations to ensure that single homeless people and others in housing need are not prevented from accessing social housing.

The Localism Act (2011) increased councils' discretion over how to allocate housing and gave councils the power to restrict access to social housing allocations by excluding groups of people designated as non-qualifying persons. As highlighted in Crisis' response to this consultation, it is now common for local authorities to include blanket restrictions on eligibility in their allocations policy, for example by excluding people who do not have a local connection, who have a history of rent arrears or previous criminal convictions. This is especially concerning given the clear links between experiencing homelessness and offending. For example, nearly a quarter of residents in homelessness accommodation are prison leavers or ex-offenders³ and a third of people recorded as sleeping rough in London in 2015/16 had spent time in prison.⁴

Clinks supports Crisis' recommendations that the guidance should be amended to recommend that local authorities do not adopt blanket exclusion policies as they undermine efforts to prevent homelessness and may exclude homeless people who should be given reasonable preference for housing.

Although the draft guidance (paragraph 2.46) encourages local authorities to consider the impact of their allocations policies on people at risk of homelessness, including single people less able to establish their residency or with a history of homelessness, evidence indicates that single homeless people continue to be excluded from accessing social housing and individual circumstances are not adequately considered.⁵

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Chapter 4 / The duty to refer cases in England to housing authorities

Cooperation between housing authorities and other public bodies, including prisons and probation providers, will be of critical importance to ensure that local authorities can implement an effective prevention duty and address the multiple and overlapping factors that cause an individual's homelessness. Although the legislation only includes a duty to refer, and does not place legal obligations on public agencies to cooperate with housing authorities:

We support Crisis' recommendation that the guidance should still encourage local authorities to explore the potential for partnerships and new ways of working that would help ensure the referral process works effectively.

It is essential that the guidance promotes and encourages joint working between Housing Options and Homelessness teams in the local authority and the public agencies listed in the duty to refer regulations, as well as any other relevant charitable or private organisations operating in the local area. This will ensure that homelessness is identified and prevented at a much earlier stage, and will greatly improve the homelessness prevention service the housing authority is able to deliver.

Q16: Taking chapters 21-25 of the Homelessness Code of Guidance which focus on particular client groups consider the following questions:

a. Having read these chapters are you clear what local authorities responsibilities are?

Having read Chapter 23 we do not feel it is clear what local authorities' responsibilities are.

If no please provide further information:

The guidance does not make it explicitly clear the role of housing authorities in relation to public, private and voluntary organisations working in the CJS. This could either lead to duplication in activity or, of more concern, instances where people in contact with the CJS fall through the gap in provision. Recent reports published by Clinks and Homeless Link,⁶ and Crisis,⁷ have highlighted that there currently exists a lack of accountability for the accommodation outcomes for people in contact with the CJS. The role and responsibility of probation providers and housing authorities is unclear. To address this issue each organisation has called for the Ministry of Justice to develop and lead a cross-departmental accommodation strategy.

Overall, we recommend the language in the code of guidance is made more specific to ensure people in contact with the CJS receive access to the accommodation advice and support they need. We hope this will result in an increase in positive accommodation outcomes that will ultimately lead to a reduction in reoffending. We have highlighted specific examples of where the wording is unclear in our answer to part b of this question and have made effort to provide concise alternatives.



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b. Would you suggest any additions, deletions or changes to these chapters?

Yes.

If yes use the form below to detail the chapter and paragraph number of the Homelessness Code of Guidance where relevant. Please expand this table as required.

Change/add/remove	Comment
<p>Chapter 23 Page 161 Paragraph 23.3</p> <p>Add a specific reference to voluntary organisations as providers of both accommodation and accommodation advice and support.</p> <p>Clinks recommends strengthening the wording to read, "housing authorities should develop clear, effective referral arrangement and accommodation pathways that involve all relevant agencies, specifying their unique role and responsibility, to provide appropriate jointly-planned help and support to prevent homelessness."</p>	<p>Voluntary organisations have been delivering essential services to people in contact with the criminal justice system for over 300 years. Clinks' recent State of the sector report found that of the 224 responses, 25% of organisations provide housing advice, whilst 16% provide accommodation or supported housing.⁸</p> <p>To reflect the role of voluntary organisations delivering accommodation support and advice, we recommend they are explicitly named as partners that housing authorities are required to work in collaboration with.</p> <p>Clinks, in partnership with Homeless Link, published the results from a short scoping exercise in February 2017 which explored the impact of the Transforming Rehabilitation reforms on the accommodation outcomes for people in contact with the criminal justice system.⁹ Transforming Rehabilitation is the name given to the government's programme for how people in contact with the CJS are managed in England and Wales from February 2015. The programme has involved the outsourcing of a large portion of the probation service in England and Wales.</p> <p>The reforms have replaced the previous 35 individual Probation Trusts with a single National Probation Service, responsible for the management of high-risk people; and 21 Community Rehabilitation Companies (CRCs) responsible for the management of low to medium risk people in 21 areas across England and Wales. The CRCs will also have a new responsibility for supervising short-sentence prisoners (those sentenced to less than 12 months in prison) after release.</p> <p>The scoping exercise found that worsening accommodation outcomes for people in contact with the CJS are mainly occurring due to increasing pressures on housing supply, and reductions in local authority budgets, which is leading to fewer housing options.</p> <p>However, the scoping exercise did highlight that due to the implementation of Transforming Rehabilitation, some stakeholders reported disruption and confusion about the new probation landscape and the roles and responsibilities of each organisation, which ultimately led to people falling through the gaps in provision and experiencing worse accommodation outcomes.</p>



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Change/add/remove	Comment
	<p>This is further supported by a recent report published by Crisis for the All Party Parliamentary Group for Ending Homelessness which found that there was a lack of understanding about which agencies were responsible for meeting the accommodation needs of people on release from prison and prison leavers were often unaware of what would happen to them on release.¹⁰ Further to this, the report also highlighted instances of where people in prison were unable to make appointments with Housing Options teams, or the Job Centre Plus whilst in custody.</p> <p>The duty to refer introduced through the Homelessness Reduction Act 2017 provides an opportunity to plug some of these gaps, making it essential that wording in the code of guidance is strengthened to recommend housing authorities develop clear and effective referral arrangements and accommodation pathways which specify each agency’s role and responsibility.</p>
<p>Chapter 23 Page 161 Paragraph 23.5</p> <p>Remove the word “try” and replace it with “ensure”. Clinks further recommends the sentence is broadened to include those on probation licence, rather than narrowly focusing on people leaving custody. We therefore suggest changing the opening sentence to read “Housing authorities and adult offender manager services should work together to ensure the accommodation needs of people leaving custody and those on probation licence are met.”</p> <p>Clinks recommends that the wording, “providers of probation services (particularly CRCs) have responsibilities to provide support to rehabilitate offenders and reduce reoffending which goes beyond a referral”, is amended to more accurately reflect the responsibilities of probation providers outlined in the Ministry of Justice’s Target Operating Model, to read “probation providers have a responsibility to support people under their supervision to reduce reoffending. Community</p>	<p>Due to the Transforming Rehabilitation reforms, Community Rehabilitation Companies (CRCs) are now responsible for providing resettlement services to people in prison in the last three months of their sentence. According to the Target Operating Model published by the Ministry of Justice, resettlement services “must include providing direct support in custody in helping offenders find accommodation, providing assistance with retaining employment held pre-custody and gaining employment or training opportunities post-release.”¹¹ As highlighted by a joint inspection report published by HM Inspectorate of Prisons and HM Inspectorate of Probation this means that “CRCs are not expected to provide accommodation themselves” but should have in place a range of advice and assistance to make sure that people leaving prison have appropriate accommodation to go to.¹²</p> <p>Clinks and Homeless Links’ scoping exercise found that the level of housing expertise provided by CRCs is variable and dependent on the CRC staff themselves, as well as the supply chain in operation. In some cases people reported poor or limited housing advice given by CRC staff. Indeed, one prison told us “[the] general level of service, in terms of resettlement, is better ... Housing is very specific and [the CRC] haven’t given it enough weight, and it’s possibly the area where it has got worse.” However, in areas where CRCs do provide robust accommodation advice and are able to signpost service users on to other services, stakeholders told us that “often there is not the supply chain to actually place those who need it into accommodation.”¹³</p> <p>Stakeholders felt accommodation provision for those under supervision of the National Probation Service was often easier to secure, as those without stable accommodation to return to are generally placed into ‘approved premises’ to serve the remainder of their sentence. These are residential units where staff provide support to manage people’s risk.</p>



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<p>Rehabilitation Companies and the National Probation Service must provide direct support to help people find accommodation. Housing authorities should continue to work with these agencies, as well as prisons and voluntary sector organisations, to ensure their clients access suitable accommodation.”</p>	<p>During the scoping exercise, a concern was raised by one interviewee that when approved premises are full, high to medium risk people are sometimes placed in temporary accommodation which is unsuitable for their level of risk. Further to this, as people are placed in approved premises based on their level of risk rather than their accommodation needs, placements may not always be appropriate. Women experience unique challenges. Stakeholders in both the Midlands and the North East said it is harder for probation to find approved premises for women who are sometimes placed far from their local area, which makes it harder for them to access the services they are familiar with and have contact with friends and family.</p> <p>It is imperative that the wording in the code of guidance is amended to clearly reflect the role and responsibilities of CRCs and the National Probation Service as referral agencies. Housing authorities should continue to work with these agencies, and develop robust partnership working arrangements with them to ensure people are able to access secure, appropriate and stable accommodation.</p>
<p>Chapter 23 Page 161-162 Paragraph 23.7</p> <p>Clinks supports the inclusion of consultation with people in prison and those with an offending history. We recommend that this is expanded to also include voluntary sector organisations and the word “may” in the following sentence to read “should”. We therefore suggest the following wording: “Housing authorities should also consult with voluntary organisations and people with an offending history before developing resources tailored to their needs.”</p> <p>To ensure consistency, it is important that there is read-across between this and Chapter 3.</p>	<p>Many people with an offending history, especially those in prison, are unable to have regular access to the internet. It is therefore important that advice services are regularly delivered in a range of ways to ensure people are able to access them.</p> <p>Many voluntary organisations deliver this advice and support, which is tailored to meet the distinct needs of their clients including those with protected characteristics.</p> <p>Clinks recommends that any resources are developed and delivered with or by these voluntary organisations and their clients.</p> <p>Due to the conditions in prisons, voluntary organisations are finding it increasingly challenging to engage with people before they are released. This was highlighted in Clinks’ recent State of the sector report, with one organisation saying “if the wings aren’t open, we can’t work. If people are suffering from mental health challenges and can’t get out of their cells, then we can’t work.” This is having an impact on organisations’ ability to put resettlement plans in place and provide accommodation support and advice to people before they are released.¹⁴</p> <p>Voluntary organisations working in criminal justice regularly consult their service users about the design and delivery of their services, with 41% organisations responding to our state of the sector survey having a service user forum or council. These organisations are well placed to support housing authorities to engage and consult people with lived experience of the criminal justice system.</p> <p>Clinks recommends housing authorities should consult with voluntary organisations and people with an offending history before developing resources tailored to meet their needs.</p>



Change/add/remove	Comment
<p>Chapter 23 Page 162 Paragraph 23.8</p> <p>Clinks recommends changing the word “might” to “should” so the following sentence reads:</p> <p>“Advice and information should reflect local circumstances and arrangements but should include.”</p>	<p>Although it is important that advice and support reflects local arrangements, there needs to be a level of consistency across the country in terms of what people are entitled to receive. This is especially important for people serving prison sentences as they are likely to have been moved to different custodial establishments whilst serving their sentence and some people, especially women, will be in prison long distances from where they will be released.</p> <p>In some cases people will be serving their sentence in a prison located a considerable distance from the area they will be resettled to. This makes it essential there is continuity between the housing advice and support offered to them before they are released.</p>
<p>Chapter 23 Page 162 Paragraph 23.9</p> <p>The sentence “it is recommended that housing advice be made available to people whilst in custody” needs to be strengthened to reflect the new 56 day statutory requirement for housing advice to be made available to anyone who will become or is homeless, including people due to be released from prison. Further to this, Clinks also recommends that the guidance makes it clear which agency is responsible for providing the housing advice to people whilst they are in prison, when they need to provide the advice and how this needs to take place. This will avoid duplication and ensure each partner agency’s role and responsibility is clarified.</p>	<p>It is imperative that timely resettlement plans are conducted with people before they are released from prison and we recommend the wording in the code of guidance is strengthened to reflect this.</p> <p>The implementation of Transforming Rehabilitation introduced a two part screening tool to determine a person’s resettlement needs whilst in prison. This is called the Basic Custody Screening Tool (BCST) and is completed in two parts. The first part is conducted on reception to prison by prison staff, whilst the second part is conducted by the CRC within five days. This informs the development of resettlement plans, which are reviewed 12 weeks before release. During the last 12 weeks of a person’s sentence, CRCs are required to take action on the resettlement plan developed on the basis of the BCST part 2. Clinks has consistently recommended that this planning takes place at an earlier stage – as soon as someone enters custody – to allow adequate time for their resettlement needs to be met. Indeed, our scoping exercise heard of one CRC that was flexible – sometimes undertaking resettlement work before the 12-week period specified – which was generally felt to support better pre-release planning and support.¹⁵</p> <p>It is positive to see in the guidance that housing authorities will need to collaborate with relevant partners, including prisons and probation providers. To ensure this can take place effectively, it is important that each organisation’s role and responsibility is clarified through the development of further guidance, for which the Ministry of Justice needs to take a leadership role.</p> <p>Clinks recommends that the code of guidance includes reference to the development of this, highlighting the role of the Ministry of Justice.</p>



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Change/add/remove	Comment
<p>Chapter 23 Page 162 Paragraph 23.11</p> <p>Include wording that requires housing authorities to also engage with voluntary organisations and persons social network, including their family for example, to help prevent them from losing their tenancy.</p>	<p>Clinks supports the focus on early intervention and prevention as well as the tone of the paragraph. As well as being under supervision from probation providers, a person may also be receiving support from voluntary organisations, which makes it important that housing authorities work to engage with these organisations.</p> <p>A person's social network, including their family, may also be able to provide additional support to help them maintain their tenancy and needs to be engaged with by the housing authority.¹⁶</p>
<p>Chapter 23 Page 163 Paragraph 23.15</p> <p>Clinks recommends that "if a prisoner is assessed as requiring assistance with accommodation on release, there will usually be sufficient time to consider their options and take action to try and prevent their homelessness" is amended to reflect the current timescale at which resettlement planning is required to take place.</p>	<p>As previously highlighted, CRCs are required to take action on people's resettlement plans 12 weeks before they are released from prison. However, due to high case-loads, a lack of adequate resources and the conditions in prison making it challenging to access people and plan for release, there are many instances when resettlement plans are not undertaken during this time period.¹⁷</p> <p>Clinks recommends that the paragraph is amended to reflect the timescale in which resettlement planning should take place, and current practice.</p>
<p>Chapter 23 Page 163 Paragraph 23.18</p> <p>The criteria for assessing vulnerability is currently unclear and doesn't allow for the range of vulnerabilities people in contact with the CJS are likely to experience to be recognised and acted upon, and therefore needs to be developed further.</p> <p>People with protected characteristics such as those from black, Asian and minority ethnic backgrounds or those from equalities groups, such as young adults, will experience unique vulnerabilities in relation to accessing accommodation. Clinks recommends the assessment criteria makes specific reference to this to ensure a holistic assessment of people's needs can take place.</p>	<p>People in contact with the criminal justice often experience multiple and complex needs, including mental health problems, drug and alcohol misuse issues, experience learning difficulties and have experiences of trauma and abuse.¹⁸ People with protected characteristics or from equalities groups also have unique needs and will experience particular vulnerabilities. All people in contact with the criminal justice system should be defined as vulnerable by housing authorities by the nature of them having a conviction; recognising the barriers this can create for them to be able to access appropriate, stable accommodation.</p> <p>If housing authorities are to assess vulnerability, Clinks recommends that the assessment process and the factors taken into consideration are tightened up and made clearer to ensure consistency of approach. Given the needs of people in contact with the CJS, we recommend the assessment criteria continues to include a holistic assessment of their needs. To support this, Clinks recommends that the guidance includes specific details about the assessment criteria and includes specific case study examples.</p>



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Change/add/remove	Comment
	<p>This will need to include consideration of mental health needs, drug and alcohol misuse problems, past experiences of trauma and abuse, learning disability, levels of maturity and whether they have specific needs due to having protected characteristics or belonging to an equalities group.</p> <p>It is positive that housing authorities will be required to work in partnership with the relevant criminal justice agencies to assess vulnerability, but the list needs to be expanded to include voluntary organisations.</p> <p>To complete assessments robustly and appropriately, we recommend that it is made explicitly clear in the guidance that housing authority staff receive adequate training, but also that relevant professionals including those in the voluntary sector and health professionals are also consulted and are able to conduct assessments.</p>
<p>Chapter 23 Page 164 Paragraph 23.20 and 23.21</p> <p>The criteria used to determine whether someone has become intentionally homeless needs to be amended to be made clearer.</p>	<p>The reasons why people commit crime are complex, multi-faceted and influenced by their personal circumstances and needs. There is much evidence to demonstrate that many people in contact with the CJS experience multiple and complex needs, including for example drug and alcohol misuse and poor mental health.</p> <p>The 'intentionality test' acts as a barrier, preventing people in contact with the criminal justice system accessing accommodation. Clinks recommends that it is removed.</p> <p>If the intentionality test remains, it is important that each person is assessed on a case-by-case basis. The wording in Chapter 23 makes it unclear as to how intentionality will be assessed and we recommend the information from Chapter 9 is referenced here. We recommend that that is developed further to ensure people receive a consistent approach. As well as engaging with probation providers, we recommend that housing authorities engage with other relevant professionals including prison staff, as well as voluntary sector providers, to ensure housing authorities are able to take a holistic view of whether a person has made themselves intentionally homeless.</p>
<p>Chapter 23 Page 165 Paragraph 23.22 to 23.24</p> <p>Include an additional paragraph outlining that many people in contact the CJS are unlikely to have a local connection to any area.</p> <p>Add in a requirement for housing authorities to engage with voluntary organisations and the person with an offending history.</p>	<p>Clinks supports Crisis' recommendation that an additional paragraph should be added here to acknowledge that some people leaving prison, especially those who have served long sentences, will not have a local connection to any area.</p> <p>In these circumstances the duty to secure accommodation will rest with the housing authority that has received the application, as per the guidance in chapter 10.</p> <p>When taking personal circumstances into account, the housing authority will need to engage with probation providers, voluntary organisations and the person themselves. It is especially important that the authority determine the terms of a person's licence to ensure that the housing options they receive are in line with these requirements.</p>



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Change/add/remove	Comment
<p>Chapter 23 Page 165 Paragraph 23.25</p> <p>Include a clear recommendation that housing authorities work to engage with voluntary organisations and the person with an offending history, as well as probation providers.</p>	<p>It is positive that the code of guidance recognises that for some people returning to an area where they have a local connection this will be prohibitive for supporting them on their journey to desistance.</p> <p>The Reducing Reoffending Third Sector Advisory Group (RR3) exists with the purpose of building a strong and effective partnership between the voluntary sector and the Ministry of Justice (MoJ). It is sponsored and funded by the MoJ, with the chair for the group and its secretariat provided by Clinks. The RR3 is convening a special interest group of voluntary sector experts focusing on how to meet the accommodation needs of people in contact with the CJS. During a recent meeting of the group organisations highlighted that some local authorities could be territorial and that having to prove a local connection before being housed was a barrier for many. This is especially the case for people who are high risk and young people involved in gangs, as going back to the area they are from makes it challenging for them to achieve desistance.¹⁹</p> <p>It is essential that housing authorities not only engage with probation providers but with voluntary organisations and the person themselves when determining if the person will be resettled to an area where they do not have a local connection. As demonstrated by desistance theory, doing interventions 'to' someone as opposed to 'with' will likely act as a barrier to their rehabilitation, making it important to ensure the person is engaged in the decision making process as to where they will be housed when they are released into the community.²⁰</p>
<p>Chapter 23 Page 165-166 Paragraph 23.28</p> <p>The guidance currently says "for some serious and public protection offences, a conviction will never be considered spent." This should be removed as the offence will be spent for the purposes of housing (it will not be spent within an employment context).</p> <p>In relation to young people, the following sentence should be added: "young people convicted before they reach the age of 18 will see their convictions spent within half of the time period for adults."</p>	<p>It is unlawful to take a spent conviction into account and Clinks therefore recommends this is highlighted specifically in the guidance.</p> <p>The wording in the guidance is currently unclear and we are concerned this will lead to confusion amongst local authorities and probation providers in relation to disclosure of convictions and when a conviction becomes spent. To address this, Clinks recommends that it is made explicitly clear in the guidance when a conviction becomes spent and includes case study examples to further support this.</p>



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Q17: Are there any other comments that you would like to make on the Homelessness Code of Guidance?

As people in contact with the CJS have unique needs and are disproportionately likely to experience homelessness, it is positive to see a specific chapter focused on them. It is important that the specific needs of other client groups are focused on within the code of guidance. Clinks recommends that other chapters are included which highlight housing authorities' duties in relation to those experiencing mental health issues, people with drug and alcohol misuse issues but also people experiencing multiple and complex needs.



Clinks supports, represents and campaigns for the voluntary sector working with offenders. Clinks aims to ensure the sector and all those with whom they work, are informed and engaged in order to transform the lives of offenders.

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Written by Nicola
Drinkwater

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Tavis House
1-6 Tavistock Square
London WC1H 9NA
020 7383 0966
info@clinks.org

🐦 @Clinks_Tweets

www.clinks.org/policy

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End notes

1. Clinks and Homeless Link (2017) *Are the accommodation needs being met for people in contact with the criminal justice system?* Online: www.clinks.org/briefings (last accessed 1.12.2017).
2. The Reducing Reoffending Third Sector Advisory Group (RR3) exists with the purpose of building a strong and effective partnership between the voluntary sector and the Ministry of Justice (MoJ). The chair for the group and its secretariat is provided by Clinks. More information can be found here: www.clinks.org/rr3
3. Homeless Link (2016) *Support for single homeless people in England – Annual Review 2016*, Online: www.homeless.org.uk/facts/our-research/annual-review-of-single-homelessness-support-in-england (last accessed 8.12.2017)
4. Greater London Authority (2016) *CHAIN Annual Report Greater London April 2015 – March 2016*, Online: <https://data.london.gov.uk/dataset/chain-reports> (last accessed 8.12.2017)
5. Crisis (2017) *Moving On: Improving access for single homeless people in England*, Online: www.crisis.org.uk/ending-homelessness/homelessness-knowledge-hub/housing-models-and-access/moving-on-improving-access-to-housing-for-single-homeless-people-in-england (last accessed 8.12.2017)
6. Clinks and Homeless Link (2017) *Are the accommodation needs being met for people in contact with the criminal justice system?* Online: www.clinks.org/briefings (last accessed 1.12.2017).
7. Crisis (2017) *All-Party Parliamentary Group for Ending Homelessness: Homelessness prevention for care leavers, prison leavers and survivors of domestic violence*, Online: www.crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf (last accessed 1.12.2017)
8. Clinks (2017) *The state of the sector: key trends for voluntary sector organisations working with offenders and their families*, Online: www.clinks.org/resources-reports-mapping/state-sector-reports (last accessed 1.12.2017)
9. This included desk-based research, as well as interviews with key stakeholders, including voluntary sector providers, local authorities and prisons. The scoping exercise explored outcomes for people being supervised by Community Rehabilitation Companies (CRC) and the National Probation Service (NPS).
10. Crisis (2017) *All-Party Parliamentary Group for Ending Homelessness: Homelessness prevention for care leavers, prison leavers and survivors of domestic violence*, Online: www.crisis.org.uk/media/237534/appg_for_ending_homelessness_report_2017_pdf.pdf (last accessed 1.12.2017)
11. Ministry of Justice (2014) *Target Operative Model: Version 3*, Online: www.gov.uk/government/publications/rehabilitation-programme-target-operating-model (Last accessed 1.12.2017)
12. HMI Probation and HMI Prisons (2017) *An Inspection of Through the Gate resettlement services for short-term prisoners*, Online: www.justiceinspectorates.gov.uk/cjji/inspections/throughthegate2016 (last accessed 1.12.2017)
13. Clinks and Homeless Link (2017) *Are the accommodation needs being met for people in contact with the criminal justice system*, Online: www.clinks.org/briefings (last accessed 1.12.2017).
14. Clinks (2017) *The state of the sector: key trends for voluntary sector organisations working with offenders and their families*, Online: www.clinks.org/resources-reports-mapping/state-sector-reports (last accessed 1.12.2017)
15. Clinks and Homeless Link (2017) *Are the accommodation needs being met for people in contact with the criminal justice system*, Online: www.clinks.org/briefings (last accessed 1.12.2017).
16. Ministry of Justice (2017) *The importance of strengthening prisoners' family ties to prevent reoffending and reduce intergenerational crime*, Online: www.gov.uk/government/publications/importance-of-strengthening-prisoners-family-ties-to-prevent-reoffending-and-reduce-intergenerational-crime (last accessed 6.12.2017)
17. HMI Probation and HMI Prisons (2017) *An Inspection of Through the Gate resettlement services for short-term prisoners*, Online: www.justiceinspectorates.gov.uk/cjji/inspections/throughthegate2016 (last accessed 1.12.2017); HM Inspectorate of Probation and HM Inspectorate of Prisons (2017) *An Inspection of Through the Gate resettlement services for prisoners serving 12 months or more*, Online: www.justiceinspectorates.gov.uk/cjji/inspections/throughthegate2 (last accessed 1.12.2017); and Clinks (2017) *Special interest group: accommodation for people in contact with the criminal justice system: 27th September 2017*, Online: www.clinks.org/criminal-justice-influencing-criminal-justice-policy-reducing-reoffending-third-sector-advisory (last accessed 1.12.2017).
18. Please see the Bromley Briefings for more information: www.prisonreformtrust.org.uk/Publications/Factfile
19. Clinks (2017) *Special interest group: accommodation for people in contact with the criminal justice system: 27th September 2017*, Online: www.clinks.org/criminal-justice-influencing-criminal-justice-policy-reducing-reoffending-third-sector-advisory (last accessed 1.12.2017).
20. More information about desistance theory can be accessed here: www.clinks.org/resources-guides-toolkits-clinks-do-it-justice-resources/introducing-desistance-guide-voluntary