A large, stylized iceberg graphic composed of many triangular facets in various shades of blue. The top part of the iceberg is above a horizontal line, while the much larger bottom part is below it, representing hidden homelessness.

LIFTING THE LID ON HIDDEN HOMELESSNESS

A New Analysis

Christa Maciver

About the Author

Christa Maciver is the Strategic Lead for Research and Policy at the Justlife Foundation

Acknowledgements

I am so grateful to everyone who has been apart of getting this report to the point of completion. A huge thanks goes to Rachel Yates, who has worked tirelessly to gather all the Freedom of Information Request data, spending most of her beginning months at Justlife immersed in the numerous responses. Thank you to all those at IPPR North who have taken much of their time to help edit this report, especially Ed Cox, Sarah Longlands and Luke Raikes. I am also grateful to a supportive and patient team at Justlife over the past few month as I have been finishing this.

Finally, we are especially grateful to LankellyChase and the Esmee Faribarin Foundation who have funded our work and made this report possible.



EXECUTIVE SUMMARY



This report provides a fresh analysis of data on hidden homeless populations in unsupported temporary accommodation (UTA) in order to lift the lid on the true extent of homelessness in England. UTA is private, short-stay accommodation in which households do not have permanent residency status and limited access to local authority support to find settled accommodation. It includes Bed & Breakfasts (B&Bs), short-stay HMOs, private hostels, emergency accommodation and guesthouses. UTA is typically ignored in legislation, policy and initiatives aimed at reducing or ending homelessness, in spite of the role it plays in the homelessness 'system'. Those in UTA are not always considered homeless although residents will not have access to safe, secure and settled housing, often fit the legal definition for homelessness and are missed completely from official statistics. As a result, many homeless households who end up in UTA do not go to local authority homelessness teams for support because they are not owed a statutory duty and cycle between rough sleeping and UTA, experiencing great hardship which largely goes unnoticed.

To understand the numbers of hidden homeless in UTA, we sent out freedom of information (FOI) requests to all 326 local authorities in England asking how many private tenants were claiming housing benefit from B&Bs in the years between 2010/11-2015/16. B&B was used as a measurable proxy for UTA, because our definition for UTA is too broad for quantitative analysis and we believe B&Bs make up a large portion of the population in UTA. According to government figures, the average official quarterly B&B placements for 2015/16 by local authorities was 5870; however, the gross population from useable FOI data from 219 returns was 20,290. Based on these figures, we have estimated that in all likelihood the B&B population in 2015/16 was upwards of 51,500, nearly ten times more than the official statistics suggest.

The reasons for variations in the B&B populations between local authority areas and English regions are complex. We compared our gross FOI data with local authority housing affordability rates and deprivation scores to determine which had the greatest influence over local B&B populations. Analysis suggests housing affordability on its own has no influence over B&B populations, but that the average deprivation of local authorities does bear a slight relationship.

Additional analysis of our data shows an increase in local authority placements into B&B accommodation between 2010/11 and 2015/16 accompanied by a reduction of 25% in so-called 'self-placements'. We believe this is partly due to the implementation of Universal Credit (UC) under which B&B landlords will receive smaller housing payments and is leading some B&B landlords to say they will no longer accept residents claiming UC. This may well be why rough sleeping is increasing. In the last year alone, rough sleeping has increased by 18% in London and 14% in the rest of the country (MHCLG 2018). It is not difficult to believe the two could be linked as qualitative research shows that many individuals cycle between rough sleeping and UTA (Rose, Maciver and Davies 2016).

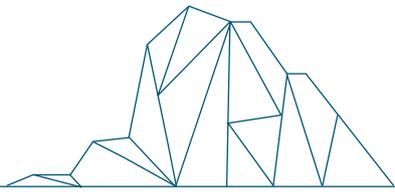
EXECUTIVE SUMMARY

We need to recognise the close relationship between UTA and more commonly recognised forms of homelessness in our attempts to address homelessness in England through policy, legislation or best practice, because there are far more hidden homeless households living in UTA than most of us in England are aware. To this end we make 4 recommendations which we believe to be vital in addressing hidden homelessness in UTA:

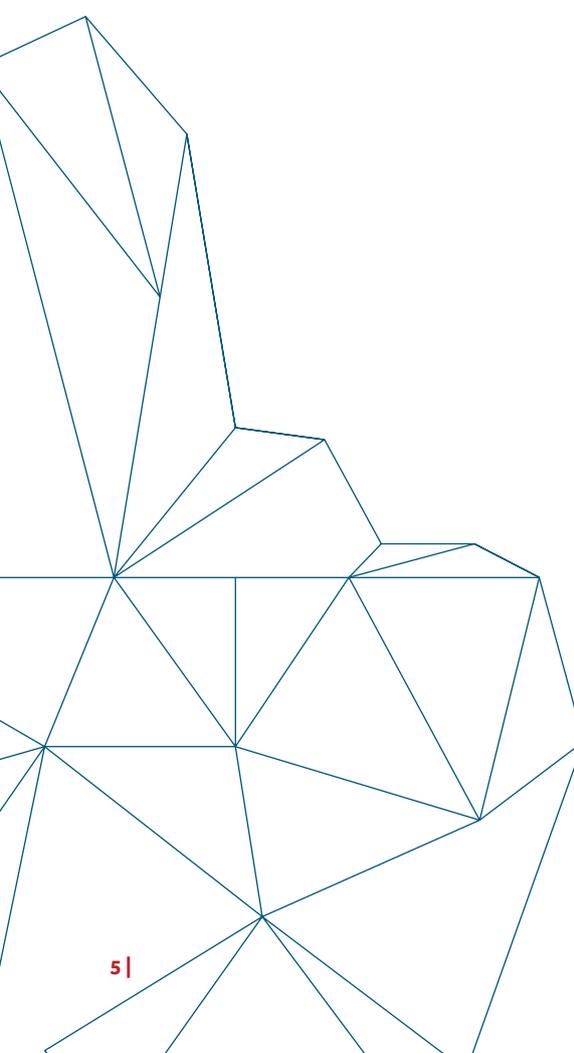
- We recommend that people living in unsupported temporary accommodation, including B&Bs, private hostels, short-stay HMOs and guest houses, are included in formal definitions of homelessness, including those used by government and its agencies.
- We recommend that government records and publishes the numbers of licensees living in unsupported temporary accommodation as part of its wider reporting of homelessness statistics.
- We recommend that private B&B accommodation be included in the exemptions to Universal Credit, ensuring awards of housing benefit to residents of B&Bs are under the higher 'board and attendance' rate rather than Local Housing Allowance.
- We recommend the creation of a Temporary Accommodation Board in each local authority area, ensuring UTA would no longer operate outside the purview of relevant agencies and stakeholders.

The unimaginable life so many live in this accommodation requires those in positions of power no longer to ignore them, but to include them in plans for ending homelessness. Our report calls for change through lifting the lid on tens of thousands vulnerable households stuck in UTA.

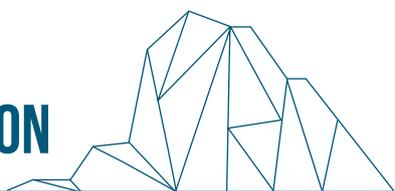
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INTRODUCTION



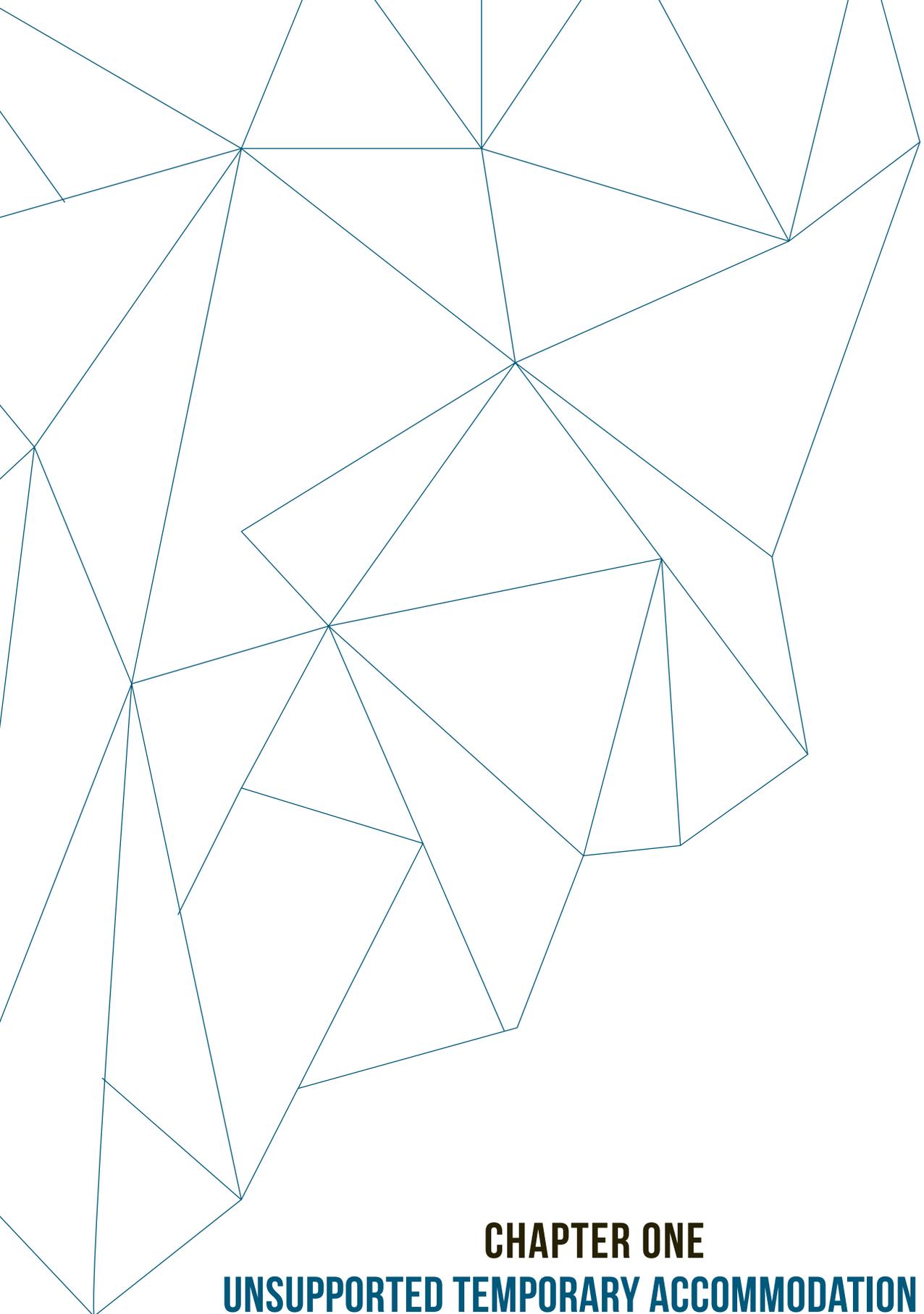
This report looks to lift the lid on hidden homelessness in unsupported temporary accommodation (UTA) by uncovering its true scale and addressing its role within the homelessness system in England. Our ambition is that the findings of this report will provide impetus for the inclusion of UTA in wider policy, legislation and practice discussions in order to truly make a lasting impact on homelessness in England.

Homelessness in England is a deepening crisis. This irrefutable fact has led to increased pressure on local and national government to provide solutions. National political responses have included the creation of the first homeless select committee in 2014, as well as the creation of an all party parliamentary group on homelessness and passage of the Homeless Reduction Act in 2016. High profile localised initiatives include the Mayors of Greater Manchester and London prioritising ending rough sleeping and preventing all forms of homelessness in their areas. There is hope of solutions on the horizon for the deepening homelessness crisis as it increasingly becomes part of political agendas. These are welcome shifts, however the issue of hidden homelessness in UTA in England is still largely ignored.

Unsupported Temporary Accommodation (UTA) is private short stay accommodation often known by other terms such as: Bed and Breakfast, short stay houses of multiple occupation (HMOs), private hostels, emergency accommodation and guest houses. Those who live in UTA have no permanent residency status and limited or no access to local authority support to secure settled accommodation. Sadly, because UTA is often ignored both by local authorities and the wider homelessness community, its residents are left with little hope for alternatives. Our previous three-year qualitative research, based on in-depth interviews with 45 residents, conducted with the Institute for Public Policy Research (IPPR) North discovered a dire reality for all those in UTA. At the point when individuals find a bed in UTA—whether self-placed, referred by local authorities or other agencies—most will experience a dramatic decrease in their mental health and feelings of control in their lives precisely when all previous support drops off entirely. Many residents will be facing severe and multiple disadvantage, while stuck in poor accommodation with intimidating environments and other vulnerable residents facing similar disadvantages. This unhappy reality for residents often feeds into cycling between rough sleeping and UTA. Unsupported Temporary Accommodation is a crucial, but currently missing, piece in conversations about the growing homelessness crisis and how to solve it.

We hope that the findings of our report will place UTA in the conversation to ensure all those in this accommodation are no longer left hidden and forgotten in some of the darkest corners of England's housing market. We do this through the following three chapters:

- Unsupported Temporary Accommodation as part of a 'system of homelessness'
- The Scale of Unsupported Temporary Accommodation
- Recommendations



CHAPTER ONE
UNSUPPORTED TEMPORARY ACCOMMODATION AS
PART OF A 'SYSTEM OF HOMELESSNESS'

CHAPTER ONE

UNSUPPORTED TEMPORARY ACCOMMODATION AS PART OF A 'SYSTEM OF HOMELESSNESS'

England's homelessness system is complex. Definitions of homelessness are improving with most accepting homelessness is more than 'rooflessness,' but as definitions become wider and more nuanced the two-tiered nature of England's homelessness system has become more apparent. This two-tiered system is boiled down to two broad categories: those who are owed a statutory duty by the local authority and those who are not. UTA falls somewhere between these categories, not quite fully in one tier or the other, as a result, tens of thousands hidden homeless households are living unacknowledged and without support in unsuitable housing. This chapter will define both homelessness and UTA, showing how they interact and what impact it has on residents.

Defining Homelessness

The basic definition of homelessness found in the Housing Act 1996 states that a person is homeless if they have no accommodation in the UK or abroad available for occupation or that individuals are entitled to occupy by virtue of an interest in, a court order or expressed interest or license (Arden and Dymond 2017). Simply having 'accommodation available for occupation' (Arden and Dymond 2017) does not ensure the safety and security that every household should have access too. Therefore, the basic definition of homelessness does not satisfactorily categorise all those facing or experiencing homelessness. Therefore, some extend their definition, as Shelter first did in their The Grief Report in 1972, that 'a person was homeless if the person lived in "conditions so bad that a civilised family life is impossible:" this was homelessness "in the truest sense of the word"' (Arden, Bates and Vanhegan 2017). More recently, Crisis (2017) has used a broad definition of homelessness in their Homeless Monitor series that covers rough sleeping; single homelessness in hostels, shelters and temporary supported accommodation; statutory homeless households (those seeking housing assistance from local authorities); and, 'hidden homeless' households. Later in 2017, Crisis published the first part of a two-part study examining levels of what they've called 'core' and 'wider' homelessness, drilling down our understanding of homelessness even further (Bramley 2017):

Core Homelessness	Wider Homelessness
<ul style="list-style-type: none"> ● Rough sleeping ● Sleeping in tents, cars, public transport ● Squatting ● Unsuitable [sic], non-residential accommodation, e.g. 'beds in sheds' ● Hostel residents ● Users of night/winter shelters ● DV victim in refuge ● Unsuitable Temporary Accommodation (which includes bed and breakfast accommodation, hotels etc) ● 'Sofa Surfing' – staying with others (not close family), on short term/insecure basis/wanting to move/in crowded conditions (this does not include students) 	<ul style="list-style-type: none"> ● Staying with friends/relatives because unable to find own accommodation (longer term) ● Eviction/under notice to quit (and unable to afford rent/deposit) ● Asked to leave by parents/relatives ● Intermediate accommodation and receiving support ● In other temporary accommodation (e.g. conventional social housing, private sector leasing) ● Discharge from prison, hospital and other state institutions without permanent housing

Building on the definitions above, we believe a person is homeless if she or he does not have a safe, secure and settled home.

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Homelessness and Unsupported Temporary Accommodation

UTA is defined as accommodation in which residents have no permanent residency status and limited access to local authority support to secure settled accommodation. It is often called: emergency accommodation, Bed & Breakfasts, short-stay HMOs, guesthouses and private hostels. In technical terms, most residents of UTA have a 'license to occupy', which at first glance does appear to fit the definition of 'accommodation available to occupy by virtue of...a license' (Arden and Dymond 2017). The problem with this assumption is that it assumes security against eviction that would be true if residents had a 'contractual license.' Practice shows, however, that residents of UTA are treated as excluded occupiers with limited housing rights and the possibility of immediate eviction. Even according to the basic definition of homelessness – UTA residents are, very practically, homeless.

UTA falls somewhere between statutory and non-statutory homelessness, not between homeless and not-homeless, but between whether an individual fits the category to qualify for local authority support or not. England's current homeless system determines two things: a) whether or not an individual is homeless and b) whether you are vulnerable enough to qualify for local authority support. Eligibility for statutory support by local authorities is determined according to the following legal requirements from the Housing Act 1996:

- a. "the person has dependent children who are residing with, or who might reasonably be expected to reside with, the person, for example, because the family is separated solely because of the need for accommodation; or
- b. the person is homeless or threatened with homelessness as a result of any emergency such as a flood, fire or any other disaster, or
- c. the person, or any person who resides or who might reasonably be expected to reside with the person, is vulnerable – in England this is vulnerability because of old age, mental illness, handicap [sic] or physical disability or other special reason; while in Wales it is because of some special reason of which those causes are illustrative, or
- d. she is pregnant, or is a person who resides or might reasonably be expected to reside with a pregnant woman" (Arden QC 2017, pp 51-51)

Households that are homeless and fit the above categories will be placed by local authority housing options teams into emergency or temporary accommodation (Wilson, Barton and Jackson 2017). Those who are not eligible will need to find their own housing solutions without help from the local authority. The reason UTA crosses both tiers of homelessness—those owed a statutory duty and those not—is because often even when households are placed into emergency accommodation or B&Bs it is for many an unknown and unspecified amount of time, without any support, little communication and poor physical environments. Anecdotally, we are hearing stories from around England of households simply left in UTA after it was discovered the local authority did not actually have a statutory duty any longer. Our previous research into UTA suggests residents can be stuck in this accommodation from anywhere between 6 months and 36 years, however it is becoming increasingly unlikely that residents will be able to move on in less than a year.

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UNSUPPORTED TEMPORARY ACCOMMODATION AS PART OF A 'SYSTEM OF HOMELESSNESS'

Additional pathways into UTA include placements by adult social care, voluntary and community services, probation services, self-referrals, hospitals and the police (Rose and Davies 2014). UTA is a last resort and final option for many hidden homeless households, even though it represents some of the most unsafe and poorest quality accommodation in the private housing market. Although public agencies have fulfilled their statutory obligation, UTA does not represent a 'home' and so UTA tenants tend to get trapped in low quality housing without support to find a real home or they cycle in and out of rough sleeping and UTA.

Impact of UTA on health and wellbeing

Temporary accommodation is no stranger to reports suggesting its negative impact on the health and wellbeing of residents. A study in 2004 uncovered deteriorating physical and mental health in families as a result of their situation in temporary accommodation (Credland 2004). Housing in general is known to have a huge impact on mental health:

'MOST PEOPLE WOULD AGREE THAT HAVING A HOME WHICH IS BOTH SAFE AND AFFORDABLE IS EXTREMELY IMPORTANT FOR YOUR GENERAL HEALTH. IF YOU HAVE POOR HOUSING OR ARE HOMELESS, IT COULD INCREASE YOUR CHANCES OF DEVELOPING A MENTAL HEALTH PROBLEM, OR MAKE AN EXISTING ONE HARDER TO MANAGE.'

—(p. 4, Mind 2014)

Particularly B&B placements by local authorities are considered largely controversial, in spite of their vast increase in use, due to the unsuitability for children (Wilson, Barton and Jackson 2017). Although there have been initiatives by the government to reduce the use of B&B accommodation—such as local authorities trying to secure private rented sector housing 'through lease agreements with private landlords' (Wilson, Barton and Jackson 2017)—the government has still received criticism in recent years on placements within B&B accommodation. The Local Government Ombudsman produced reports on the use of unsuitable B&B accommodation by local authorities in their reports: No Place Like Home (Local Government Ombudsman 2013) and Still no place like home? (Local Government and Social care Ombudsman 2017).

It is not surprising, then, that our recent research into the affects of UTA on the health and wellbeing of residents uncovered consistent themes. This in-depth research by Justlife and IPPR North resulted in three published reports: Not Home (Rose and Davies 2014), Nowhere Fast (Rose, Davies and Maciver 2016) and The Journey Home (Maciver, Snelling, Rose and Davies 2016). We uncovered a bleak reality facing households living in UTA. Those who entered the accommodation (regardless of pathway) entered for an unknown and unspecified amount of time, some reported staying in the accommodation anywhere between six months to 36 years. Over 50% did not have a working lock on their door and most were sharing filthy, squalid bathrooms, which were regularly out of order. Many residents reported feeling intimidated and harassed by other residents, and in some cases, by the management and the landlords.

CHAPTER ONE

UNSUPPORTED TEMPORARY ACCOMMODATION AS PART OF A 'SYSTEM OF HOMELESSNESS'

Here are some experiences of living in UTA in the words of residents:



'I JUST DIDN'T FEEL SAFE THERE AT ALL AND THAT'S WHY I WAS OUT ALL THE TIME. ESPECIALLY AFTER THAT SCENARIO WITH THE MAINTENANCE GUY OFFERING ME LEGAL HIGHS WHEN I WAS ALREADY INTOXICATED – THAT'S JUST PREYING ON THE VULNERABLE.'

'THERE IS A COUPLE OF OLD PEOPLE WHO ARE IN THERE, WHO HAVE BEEN LIVING IN THERE FOR A BIT, AND THE LANDLORD'S TAKEN THEIR BANK CARDS OFF THEM – CASHING THEIR MONEY, IT'S A DISGRACE. SAYING, "OH, I'LL KEEP HOLD OF YOUR BANK CARD", CASHING THEIR MONEY AND THEY ARE NOT SEEING THEIR MONEY.' 'I JUST DIDN'T FEEL SAFE THERE AT ALL AND THAT'S WHY I WAS OUT ALL THE TIME. ESPECIALLY AFTER THAT SCENARIO WITH THE MAINTENANCE GUY OFFERING ME LEGAL HIGHS WHEN I WAS ALREADY INTOXICATED – THAT'S JUST PREYING ON THE VULNERABLE.'

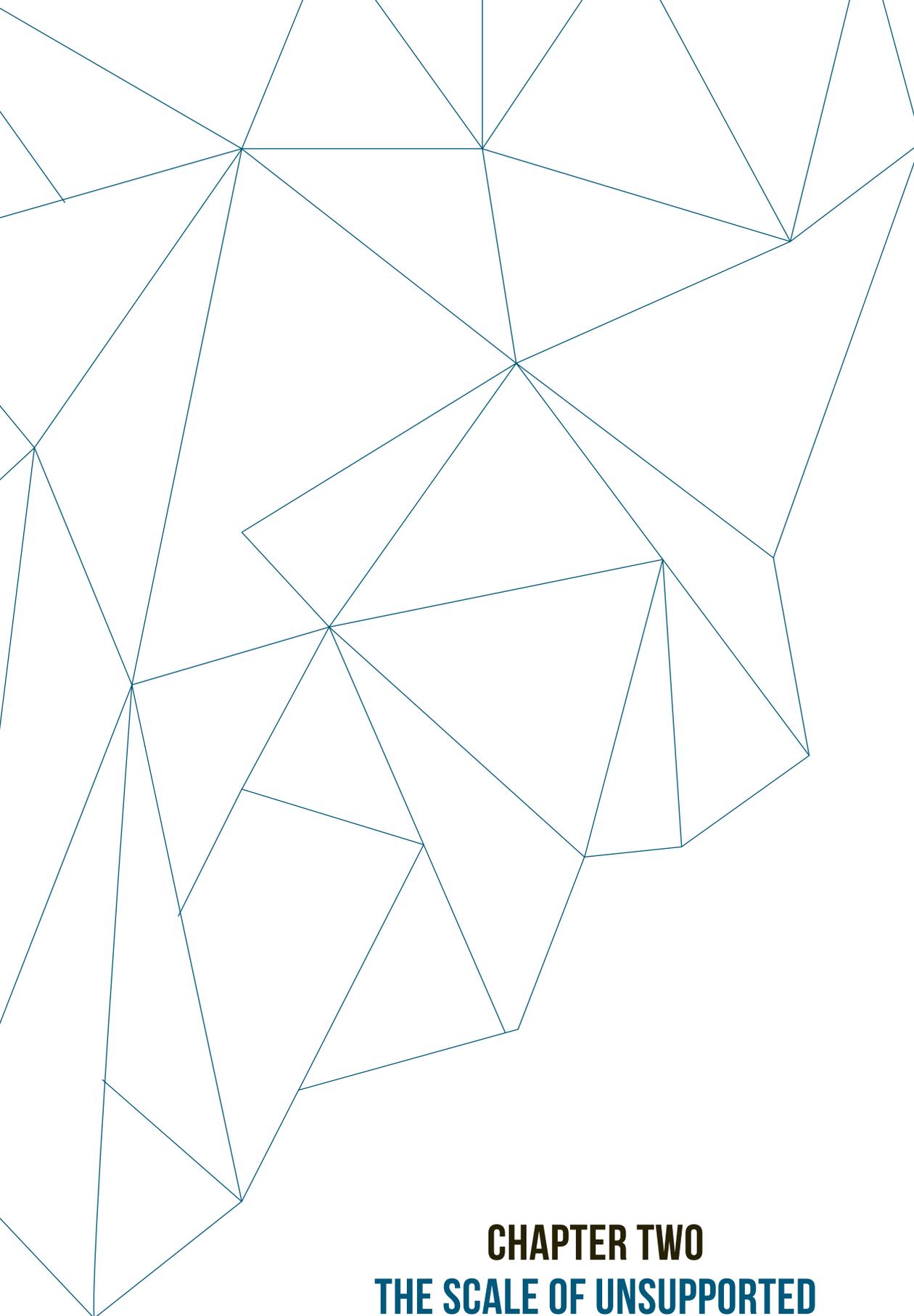
'NO HOT WATER FOR FIVE DAYS NOW ... AS LONG AS HE GETS HIS RENT, £20 A WEEK SERVICE CHARGE – PISSING SERVICE, I TELL YA, THERE'S NONE ... THERE ARE JUST THINGS THAT HE NEEDS TO SORT OUT, AND HE IS NOT DOING IT.'

(Rose, Davies and Maciver 2016)

Out of 45 research participants, 22 felt their physical health had deteriorated and 38 felt their mental health had deteriorated. 39 participants felt completely out of control with their lives, and sadly, five died over the course of the three years. This is a challenging and intimidating reality facing households who find themselves in UTA.

Conclusion

As this chapter has highlighted, homelessness is much more than 'rooflessness' and that even as definitions become more encompassing, many hidden homeless households in UTA are still missed, often because they are not considered homeless or they become lost between the cracks of England's two-tiered homeless system. All those living in UTA are homeless. They have no security of tenure, very few rights and do not have access to a safe and settled home.



CHAPTER TWO
THE SCALE OF UNSUPPORTED
TEMPORARY ACCOMMODATION

CHAPTER TWO

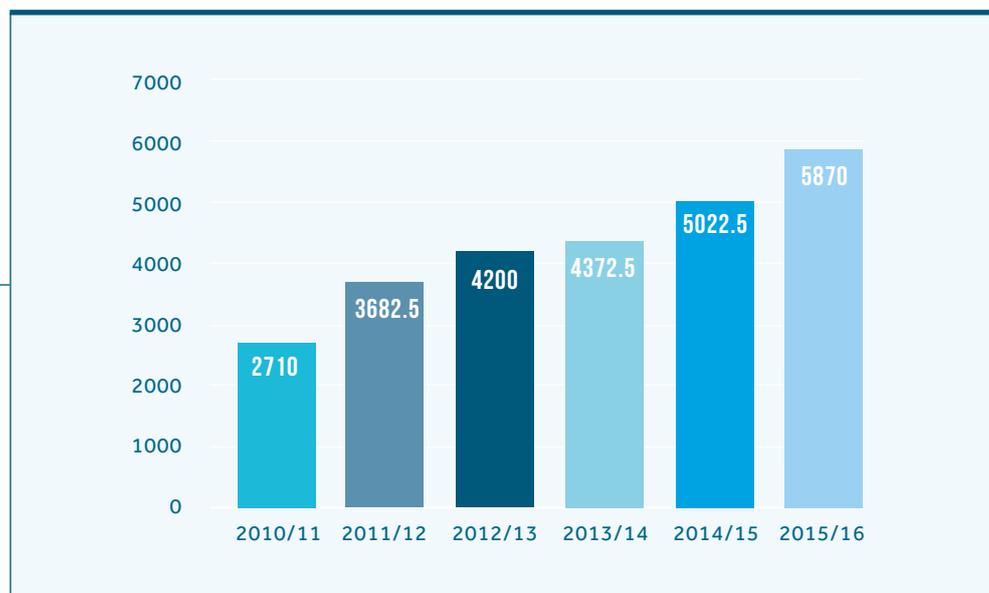
THE SCALE OF UNSUPPORTED TEMPORARY ACCOMMODATION

Arriving at a population estimate of the entire hidden homeless population of UTA is difficult due to it encompassing various types of unsupported housing such as: B&Bs, private hostels, emergency accommodation or short-stay HMOs. In addition, the fact that UTA sits somewhere between the two 'tiers' of England's homeless system (therefore encompassing some households owed a statutory duty and some not), makes accessing consistent and reliable data tricky. In order to quantify the population in UTA, we needed a measurable definition that could be used across every English local authority. UTA is still largely disregarded, misunderstood and ill defined across the homelessness sector, however B&B—which we believe make up a large number of the population in UTA—provided a measurable proxy for UTA in this research. Using B&B also meant we could compare our findings with a similar population estimate published in 1997 in a report by Shelter, 'The Last Resort' (Carter 1997). This chapter provides an analysis of the B&B data we have gathered, which then helps to shed light on the wider population of hidden homelessness in UTA.

Current Available Statistics

There has been a marked increase in all forms of homelessness since 2010 (Crisis 2017), a trend reflected by statistics held on official B&B placements by the Ministry for Housing, Communities and Local Government (MHCLG). In 2015/16, the quarterly average number of households placed into B&B by local authorities was 5870. This figure is 117% higher than the average households placed in 2010/11. This change is indicated in the table below:

OFFICIAL QUARTERLY AVERAGE B&B PLACEMENT FIGURES



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THE SCALE OF UNSUPPORTED TEMPORARY ACCOMMODATION

In 2017, Crisis reported that placements by local authorities into B&Bs—although only 9% of the official total in temporary accommodation—was the accommodation with the largest increase in placements compared to all other official forms of temporary accommodation (Crisis 2017). This is a concerning fact considering the controversy surrounding B&B placements and its affect on homeless households.

In the past year, the MHCLG has been criticised for the reliability and accuracy of their statistics. The National Audit Office (2017) and the Public Accounts Committee (PAC 2017) both voiced their concerns at the end of 2017 with the PAC going as far as saying, 'The Department lacks the proper understanding of those who are homeless and it needs to ensure that they are being helped effectively.' This lack of proper understanding from the MHCLG most certainly extends to households living in UTA due to the fact so many are completely missed in official statistics. A previous population estimate published by Shelter in 1997 in their report, 'The Last Resort' suggests that while official figures of B&B populations in England and Wales was 7660, their estimate was closer to 72,550. The analysis of the data gathered for this report has uncovered a similar difference between official B&B figures and our estimates between 2010/11 and 2015/16, almost a full 20 years later.

Whether a household is in official temporary accommodation or not, all those living in B&Bs (and UTA) should be, to the best of our ability, included in homelessness statistics. Their inclusion would provide a total number more reflective of the actual population of hidden homeless households living in all forms of temporary and unsupported temporary accommodation.

CHAPTER TWO

THE SCALE OF UNSUPPORTED TEMPORARY ACCOMMODATION

Justlife Research Methodology

The data gathered for this report is the result of Freedom of Information (FOI) requests sent out to every local authority in England. This request asked local authorities for data regarding 'private tenants claiming housing benefit from a Bed and Breakfast and/or all other accommodation with board and lodgings' for financial years between and including 10/11 – 15/16¹. The FOI was sent to all 326 local authorities in England. We received 309 responses, 219 of which contained useable data.

It was crucial for this research that we did not simply receive data regarding official B&B placements as part of a homelessness duty, but that we also built a picture of those living in B&B accommodation who were not placed by local authorities. We received both types of data: 99 local authorities provided only official B&B placement data and another 99 local authorities provided only so called 'self-placements', in addition 21 local authorities gave us data in both categories.

In order to fill the missing gaps in our data left from the local authorities that did not respond, refused to respond and those who only gave us either official B&B placements or B&B 'self-placements,' we used the Rural and Urban Classification for Local Authority Districts (RUCLAD) classifications to estimate population figures in the gaps. RUCLAD is a method that categorises local authorities according to both their 'rural' and 'rural-related' population components alongside their context: whether or not they lie in 'connerbations' (Office of National Statistics 2014)². We estimated national and regional populations using RUCLAD classifications. Finally, we compared the gross data received to both the English indices of multiple deprivation (MHCLG 2015) and housing affordability ratios (ONS 2017) in order to gain additional insight into possible drivers of B&B population size.

¹ The full text of the Freedom of Information request can be found in Appendix 1

² Note on methodology, including data found in Appendix 2

CHAPTER TWO

THE SCALE OF UNSUPPORTED TEMPORARY ACCOMMODATION

A. NATIONAL PATTERNS

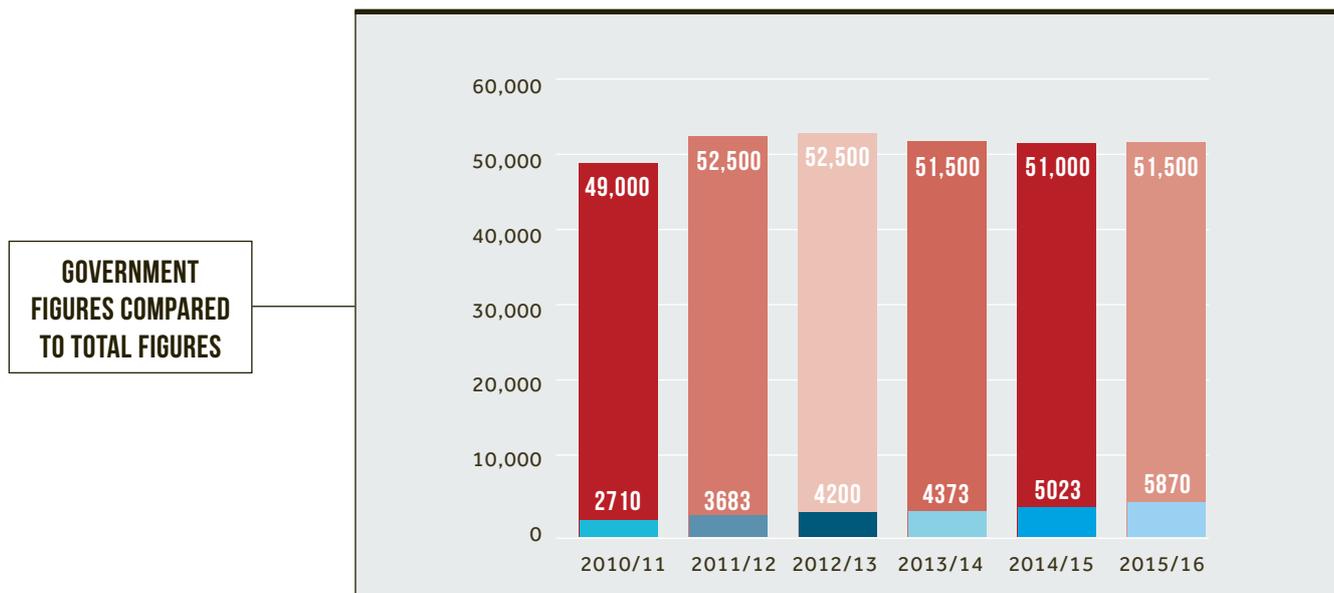
Analysis of the Scale

Official B&B figures for 2015/16 state that there was an average quarterly placement of 5,870 households living in B&B accommodation that financial year. However, the useable data from our FOIs generated an actual figure (before estimates) of 20,290; almost four times the official average. In spite of the rate of response received from our FOI requests, there were still plenty of gaps in the data provided.

The responses received regarding 'private tenants claiming housing benefit from a Bed and Breakfast and/or all other accommodation with board and lodgings' resulted in data which differentiated between those placed by homelessness as well as those living in and claiming housing benefit from a B&B who were not placed by the local authority under homelessness. Only 21 local authorities provided data for both categories and we therefore used RUCALAD to fill data gaps and arrive at improved estimates for both national and regional B&B populations in England.

WE ESTIMATE THAT THE NATIONAL B&B POPULATION FOR ENGLAND IN 2015/16 IS ACTUALLY MORE LIKE 51,500, A FIGURE THAT IS NEARLY TEN TIMES HIGHER THAN THE GOVERNMENT AVERAGE FOR THE PERIOD.

Using this methodology, we estimate that the national B&B population for England in 2015/16 is actually more like 51,500, a figure that is nearly ten times higher than the government average for the period. The difference between government statistics and our estimates for the full six years of the research shows this large discrepancy is nothing new. The chart below visualises this difference between 2010/11 and 2015/16.



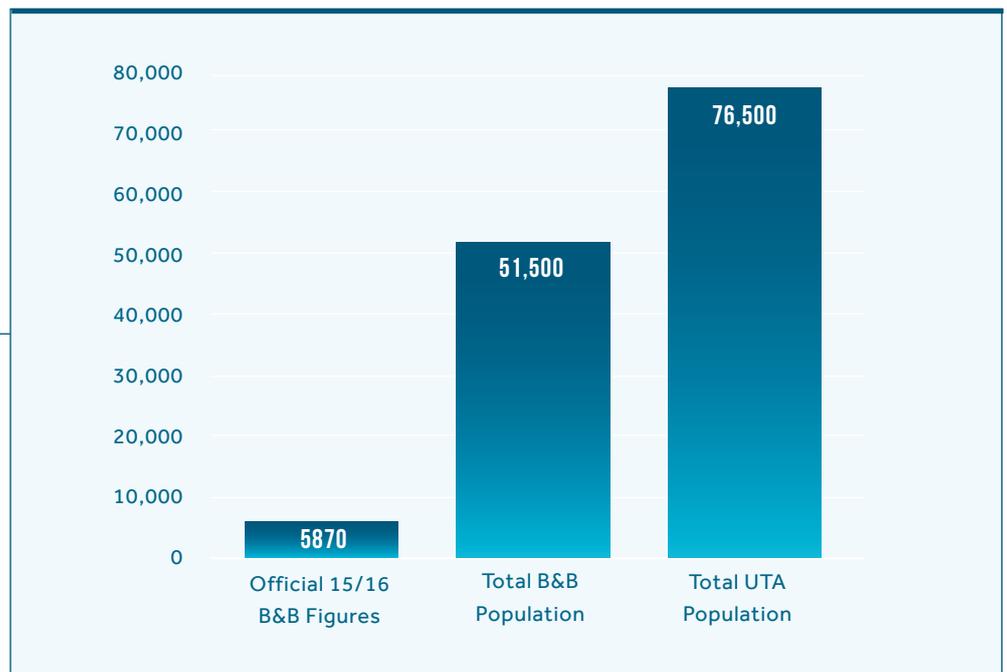
Our estimates suggest that the overall number of households claiming housing benefit from B&Bs increased by 5.4% between 2010/11 and 2015/16. The gap, however, between our figures and government statistics appears to be shrinking, albeit very slightly.

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THE SCALE OF UNSUPPORTED TEMPORARY ACCOMMODATION

Although the gap has only decreased by approximately 1% between 2010/11 and 2015/16, this does suggest something is happening to cause this shift, a pattern discussed in the following sections.

It is important to note that the data gathered in this research only covers households claiming housing benefit in B&Bs, which is just a portion of UTA in England, suggesting the total number of households living in all of UTA is even higher than the 51,500 estimated to be living in B&Bs. This figure does not include hidden homeless households in UTA living in accommodation classified as private hostels or short-stay HMOs. We estimate the total population of UTA could be an additional 25,000 higher than our estimated B&B population due to the anecdotal information from areas such as the North East, Greater Manchester and Birmingham, among others.

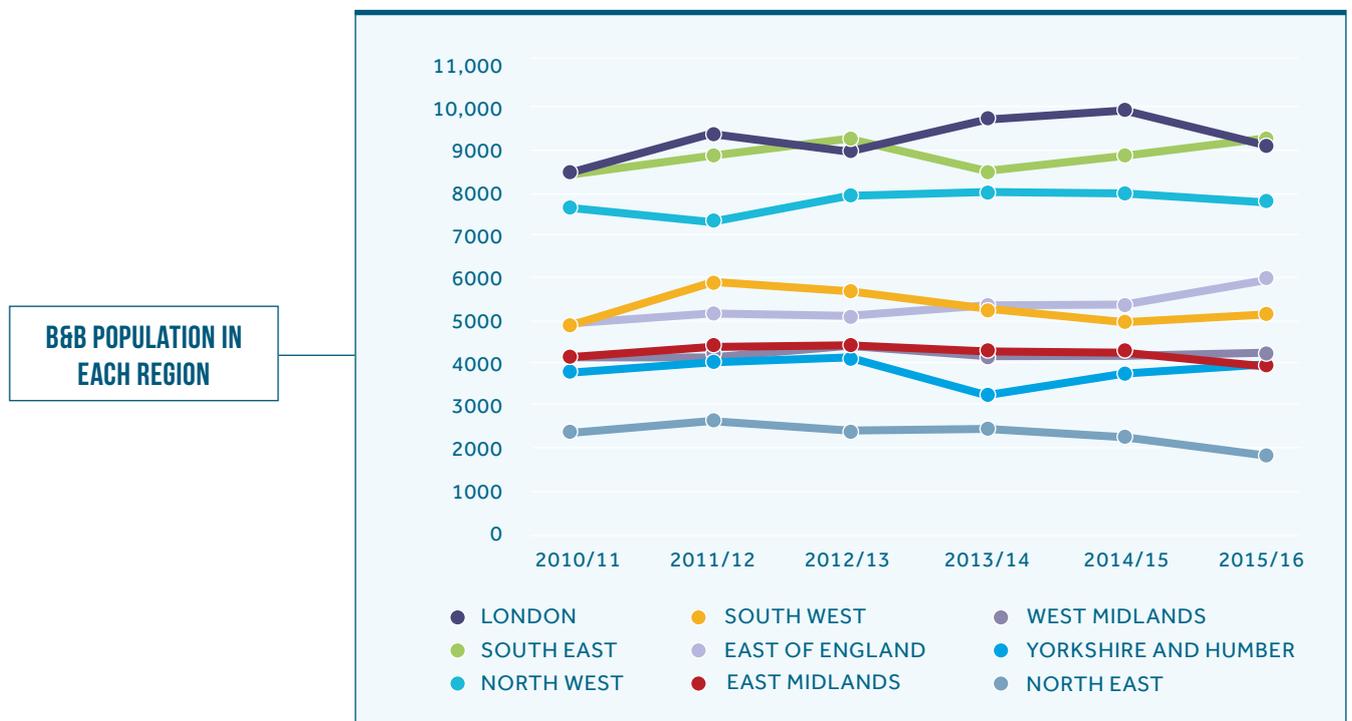


CHAPTER TWO

THE SCALE OF UNSUPPORTED TEMPORARY ACCOMMODATION

B. REGIONAL AND LOCAL PATTERNS

Regional analysis suggests very steady patterns of B&B claims in the majority of areas albeit with some significant difference in the gross numbers between regions. The graph below visualises the patterns in each region, based on our estimates, between 2010/11 and 2015/16.



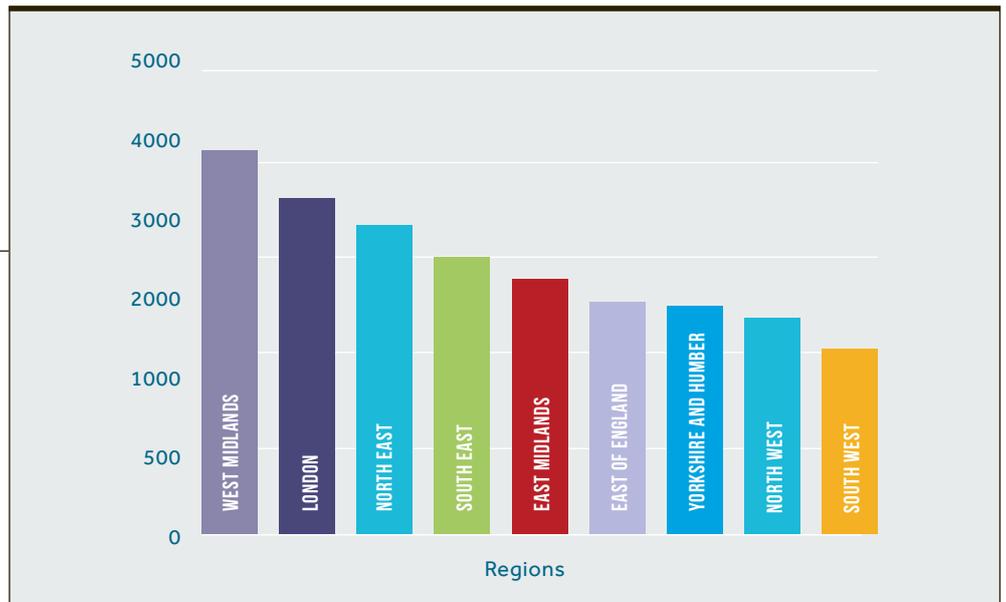
According to our research, some regions remain largely unchanged across the six years, but every region saw a slight increase in B&B populations aside from the North East and the West Midlands. The B&B population in the North East decreased by 23.4% (from an estimated 2390 to 1830) over the six years and B&B population in the West Midlands decreased by 5.4%. The East of England's B&B population increased the most over the six years, by 21.3%.

The region with the highest population in 2015/16 was the South East with an estimated 9290, and the region with the lowest population was the North East with an estimated 1830. However, these estimated B&B populations per region do not provide a picture of what proportion of the regional population live in B&Bs. The graph below highlights the population in B&Bs as a proportion of the regional population, using actual figures provided from FOI data.

CHAPTER TWO

THE SCALE OF UNSUPPORTED TEMPORARY ACCOMMODATION

**B&B POPULATION AS
PORTION OF THE TOTAL
REGIONAL POPULATION**



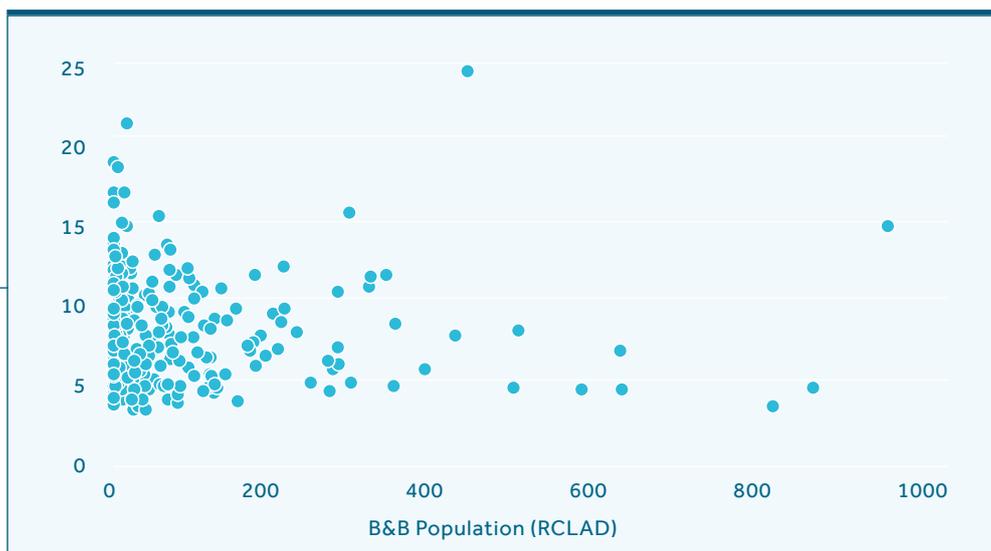
The graph shows the region with the least number of B&B residents, as a proportion of the regional population, is the West Midlands, where the B&B population is only 1 in every 4094. The most proportionally populated region is the South West with a B&B population of 1 in every 1973. The next three regions with the highest proportion of the population in B&Bs are the North West (1 in every 2307), East of England (1 in 2430) and Yorkshire and Humber (1 in 2474).

The causes behind differing B&B population levels per region and local authority are complex. Certain factors such as housing affordability, average deprivation levels or a combination of the two per local authority may provide insight into potential influencing factors. The two scatter charts below show the gross data provided from all 219 local authorities compared to the housing affordability rates and average deprivation rates for their authority.

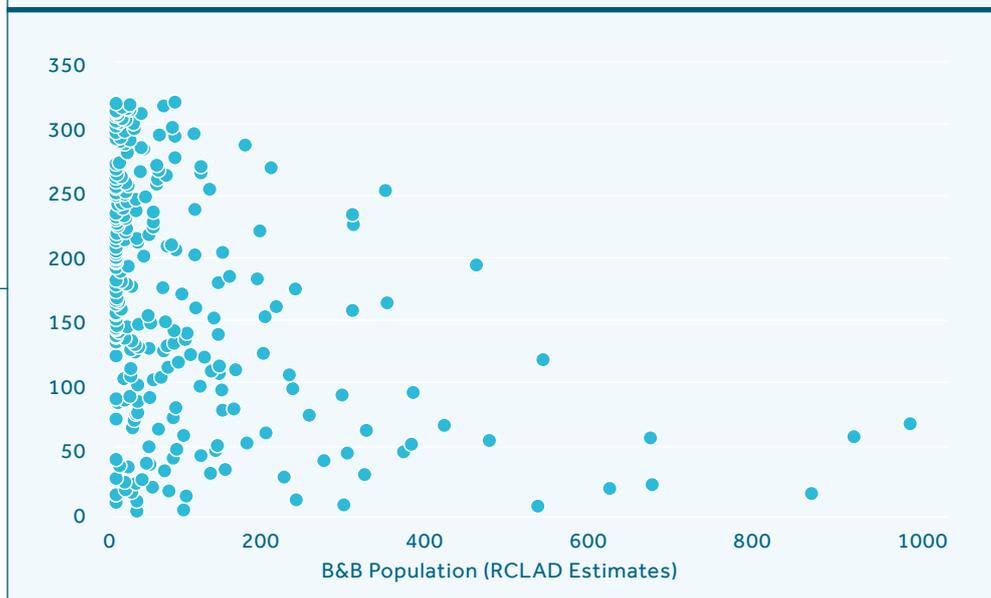
CHAPTER TWO

THE SCALE OF UNSUPPORTED TEMPORARY ACCOMMODATION

HOUSING AFFORDABILITY COMPARED TO B&B POPULATION PER LOCAL AUTHORITY IN ENGLAND



DEPRIVATION RATES OF ENGLISH LOCAL AUTHORITIES COMPARED TO THEIR B&B POPULATION



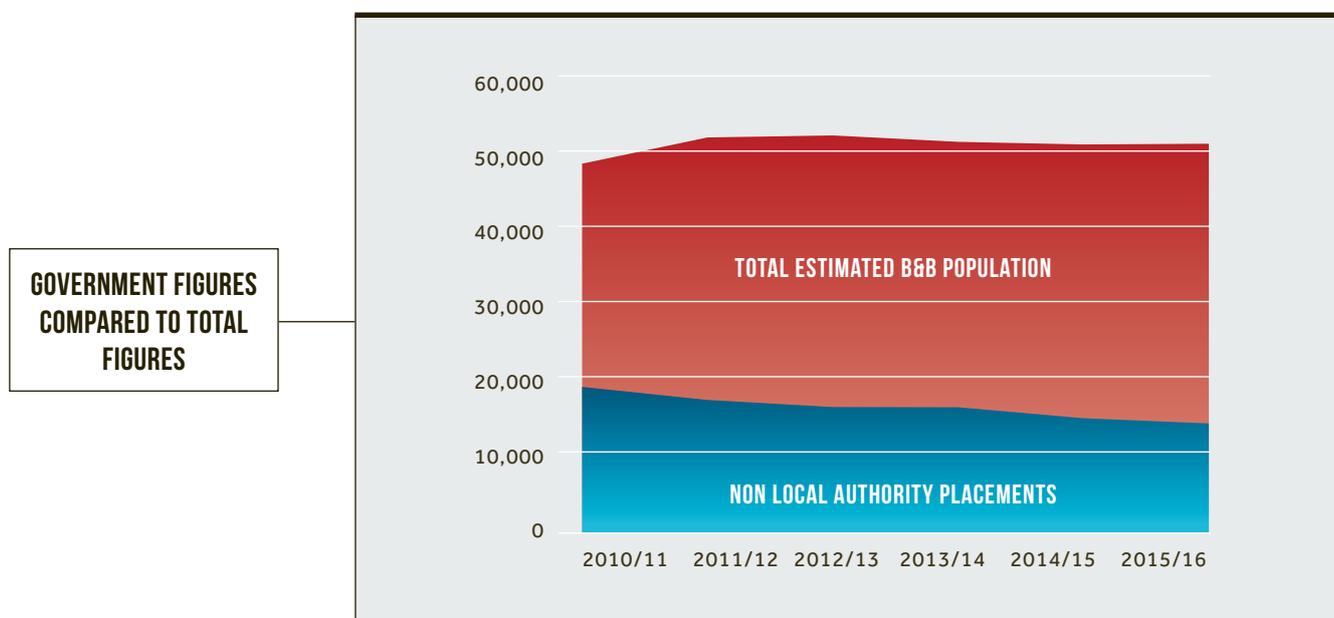
These charts show that there is very little relationship between housing affordability and the local B&B population in a local authority, whereas deprivation may have some relationship, suggesting poverty is a factor. This relationship between deprivation rates and B&B populations becomes more evident on regional levels, where a higher density of B&B populations are found in the top 10% of deprived local authorities in each region. In all but three regions—London, East Midlands, and West Midlands—an average of 28% of the total region's B&B population lives in the 10% most deprived local authorities in each region, while only 1.8% of a region's B&B population is found in the local authorities with the least affordable housing. The one exception to this is London, which according to our data sees an equal relationship between housing affordability and deprivation on B&B populations, however the lack of data received from our FOI requests to London Boroughs suggests we cannot draw on this analysis.

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C. WELFARE IMPACT ON B&B POPULATION TRENDS

The most evident change our data uncovered was the stark decrease in self-placements into B&B over the six years in our research. Self-placements into B&Bs decreased by 25.1% across the six years while the local authority placement population increased by 22.7%. These changes are highlighted in the chart below, where there is a visible decrease in the blue area representing all those households living in B&Bs who were not placed by local authorities and the red area representing official B&B placements.



A possible explanation for this is the impact of welfare reform on these populations.

Welfare changes such as Universal Credit (UC) and the implementation of Local Housing Allowance (LHA) are likely causing the decrease in self-placements into B&B accommodation. Prior to the implementation to UC, private landlords of B&Bs could receive higher housing payments under Housing Benefit legislation if the accommodation provided substantive 'board and attendance.' (e.g. cooked meals and shared facilities) (Housing Benefit Act 2006)³. This payment was typically higher than the Local Housing Allowance, as B&B housing, under Housing Benefit legislation, is exempted from LHA. (Department for Work and Pensions 2014).

Therefore, the welfare change that seems to be affecting B&B populations is as a result of the implementation of UC. The Universal Credit Regulations 2013, specifically those pertaining to the housing element of the benefit makes no obvious mention of an exemption of 'board and attendance' or B&B accommodation. Schedule 4—Housing costs element for renters—mentions instances of exceptions, such as for 16/17 year olds (Universal Credit Regulations 2013), and provides definitions of 'temporary

³ Specific mention of this can be found in the Housing Benefit Act 2006 in the insertion of regulation 13A after regulation 13, Maximum Rent (standard local rate), p. 147.

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accommodation⁴ and 'hostel'⁵ under the legislation, both of which preclude the possibility of privately run temporary accommodation or hostels. This exclusion suggests that any B&B accommodation run by private landlords would fall simply under renting in the private rented sector.

In practice, this means when B&B residents make the transition from legacy benefits to UC their housing element award will be less due to being determined under LHA. The reduction in income for landlords could lead to higher costs on individual households or local authority as well as increased possibility for eviction. This is likely to be the main reason why landlords are refusing to accept individuals seeking self-placements.

Thirteen local authorities responded to our freedom of information request suggesting that the reason they either had few or no claims to B&B accommodation was directly related to local housing allowance, one specifically cited universal credit⁶. These thirteen local authorities rolled out Universal Credit at various times, but all had the live service and some the full service at the time of our Freedom of Information Request⁷. Locally, we are hearing stories of UTA landlords refusing to accept anyone claiming UC as well as suggestions that private landlords of B&Bs are discovering a way around these changes by becoming registered social landlords (RSLs) in order to again be exempt from UC and LHA rules. While at face value some may think B&Bs applying for RSL status is a good thing so the accommodation is not lost as a housing option, many are not improving the quality or care in their accommodation, but just getting higher income. There needs to be increased regulation to ensure that if this is happening across the country, that this accommodation is then properly regulated and the hidden homeless population within them are, in fact, receiving the support they need.

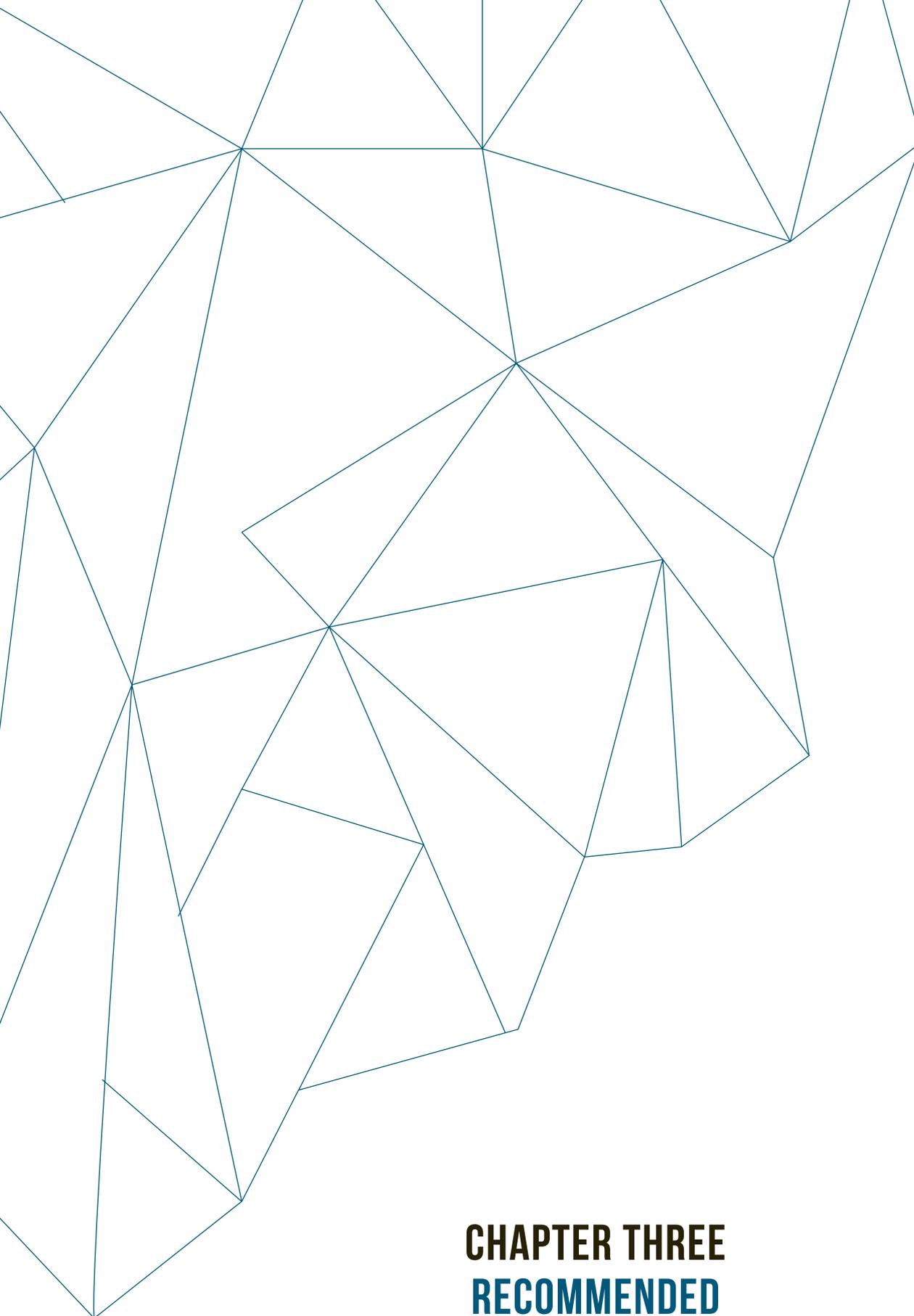
Therefore, with the continued roll out of UC across England, it is entirely possible that self-placed numbers in B&Bs will continue to fall. This trend may not affect UTA residents in short-stay HMOs, but we need more data in order to assess this. The worrying decrease begs the question, 'Where are they going?' The 25% fewer people self-placing in B&B could be another contributor to the continued increase in rough sleeping, which recent reports show has risen by 18% in London and 14% in the rest of the county since autumn 2016 (MHCLG 2018).

⁴ 'Temporary Accommodation' is either (1) accommodation whose rent goes to the local authority and/or the local authority made the accommodation available (to prevent or relieve homelessness) or (2) accommodation whose rent goes to a provider of social housing and/or the accommodation was made available to the renter as a result of an arrangement with the local authority to relieve or prevent homelessness. (Universal Credit Regulations 2013: schedule 4, part 4, para 21)

⁵ A "hostel" is a building in which 'there is provided, for persons generally or for a class of persons, domestic accommodation, otherwise than in separate and self-contained premises, and either board or facilities for the preparation of food adequate to the needs of those persons' and is also managed by a provider of social housing other than a local authority, 'operated other than on a commercial basis and in respect of which funds are provided wholly or in part by a government department or agency or local authority' or is managed by a voluntary organisation or a charity that provides support to be resettled into the community. (Universal Credit Regulations 2013: schedule 4, part 4, section 29, para 10)

⁶ The local authorities specifically mentioning LHA were: Hinckley and Bosworth, North West Leicestershire, Tendring, Southampton, Thanet, Bolton, Hackney, Sefton, Watford, Hart, Lichfield, Tandridge. The one local authority specifically mentioning UC was: Hambleton

⁷ **Bolton** (Live service: 30 June 2014); **Hambleton** (Live Service: 16 Feb 2015; Full service: 12 Oct 2016, only some postcodes in Hambleton are 'Full'); **Hinckley and Bosworth** (Live Service: 23 March 2015; Full service: 8 March 2017, only some postcodes in Hinckley and Bosworth are 'full'); **North West Leicestershire** (Live service: 28 September 2015 & 26 October 2016); **Tendring** (Live Service: 13 April 2015); **Southampton** (Live Service: 16 March 2015; full service: 22 February 2017); **Thanet** (Live Service: 12 Oct 2015; Full service: 19 July 2017 & 6 September 2017); **Hackney** (Live Service: 28 March 2016; some full service from 29 March 2017); **Sefton** (Live Service: 30 June 2014); **Watford** (Live Service: 23 Nov 2015); **Hart** (Live Service: 15 Feb 2016); **Lichfield** (Live Service: 23 March 2015); **Tandridge** (Live Service: 15 Feb 2016 & 18 Jan 2016; one postcode—CR2—went to Full Service on 27 April 2016)



CHAPTER THREE
RECOMMENDED
SOLUTIONS

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RECOMMENDED SOLUTIONS

The recommendations outlined in this chapter show the close relationship between UTA and more commonly recognised forms of homelessness and reminds us that there are far more hidden homeless households living in UTA than most of us in England are aware. For these reasons, UTA needs to be a part of any attempts to address homelessness in the UK whether through policy, legislation or best practice. We believe the following recommendations will move us toward improved methods of gathering information on the scale of hidden homelessness in UTA, as well as help towards ensuring anyone's experience in UTA becomes more safe and secure.

1

RECOGNITION

Recognise that all those living in UTA are homeless

Currently, most hidden homeless households in UTA are not recognised as homeless. This is often because they fall outside of statutory homelessness, some never having approached a council for rehousing support. However, all those living in UTA do not have safe, secure and settled accommodation. The majority are also, in practice, treated as excluded occupiers with the prospect of eviction at any moment. Residents of UTA fit both the basic and more nuanced definitions of homelessness. They are homeless and need to be recognised as such in order to move conversations about solving and preventing homelessness forward.

We recommend that people living in unsupported temporary accommodation, including B&Bs, private hostels, short-stay HMOs and guest houses, are included in formal definitions of homelessness, including those used by government and its agencies.

2

RECORDING

Distinguish and report on type of tenure—i.e. license agreement vs tenancy agreement—under both housing benefit and the housing element of UC.

The full scale of UTA is impossible to quantify short of a national census. The numbers highlighted in this report suggest there needs to be an improved method of recording those living in UTA. One common factor between UTA is the fact that the majority of households residing in the accommodation are not tenants, but rather are licensees. Although not all licensees would necessarily be living in UTA, reporting on numbers living in accommodation as licensees and claiming either housing benefit or the housing element of UC would provide improved accuracy of population estimates in UTA than we are able to produce now. The ability to distinguish and record type of tenure within housing benefit offices and UC offices of the DWP would make better estimates possible.

We recommend that government records and publishes the numbers of licensees living in unsupported temporary accommodation as part of its wider reporting of homelessness statistics.

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3

REMUNERATION

All forms of B&B should be exempt from the housing element of Universal Credit to ensure residents access to higher housing payments

UTA provides another form of temporary housing for those who have no other option, in spite of the poor physical and social conditions it entails. The potential loss of this accommodation due to UC and LHA may be causing increased numbers of rough sleeping, an unforeseen consequence of UC as it continues to be rolled out nationally. Private landlords are increasingly refusing to accept anyone on UC, and if they do, the likelihood of non-payment of housing costs is high due to the transient nature of this population (the residents may move within a few weeks before receiving their first housing payment). For some, this type of accommodation is the last resort and the continued implementation of UC and LHA rates on private B&Bs is removing even the 'accommodation as a last resort' as an option.

We recommend that private B&B accommodation be included in the exemptions to UC, ensuring awards of housing benefit to residents of B&Bs are under the higher 'board and attendance' rate rather than LHA.

4

REGULATION

Local Authority areas should create Temporary Accommodation Boards and work with stakeholders of UTA to ensure standards within the accommodation and appropriate support are upheld.

The remuneration landlords will receive from and exemption from UC should not happen in isolation of work that ensures improvement to safety and standards within UTA. Justlife and IPPR North's main recommendation in their reports *Nowhere Fast* (Jan 2016) and *The Journey Home* (Dec 2016) was to create place based collaborations—Temporary Accommodation Boards—whose responsibility would include improving the safety and standards of UTA.

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Temporary Accommodation Boards (TABs) are locally driving collaborations between relevant stakeholders—Local authority representatives, Environmental Health Departments, Fire Service, Third Sector organisations, Police, drug and alcohol teams, mental health teams, probations services, landlords and residents—of UTA brought together to:

- Influence narrative around commissioning for people in UTA
- Map local UTA bedspaces
- Implement minimum standards
- Improve referral and support practices
- Address conditions
- Implement any other relevant changes

These collaborations are locally created in order to drive relevant innovation for each area. The successes of these TABs are reliant on equal collaboration, cross-sector inclusion and strong relationship between members. These elements ensure a positive working-culture built around finding solutions rather than laying blame, which is especially important when bringing such a diverse group of stakeholders together.]

These Temporary Accommodation Boards would also be in a position to monitor and evaluate private B&B landlords' transition to RSL status in relevant areas to ensure landlords are not just getting increased income without increasing property and support standards.

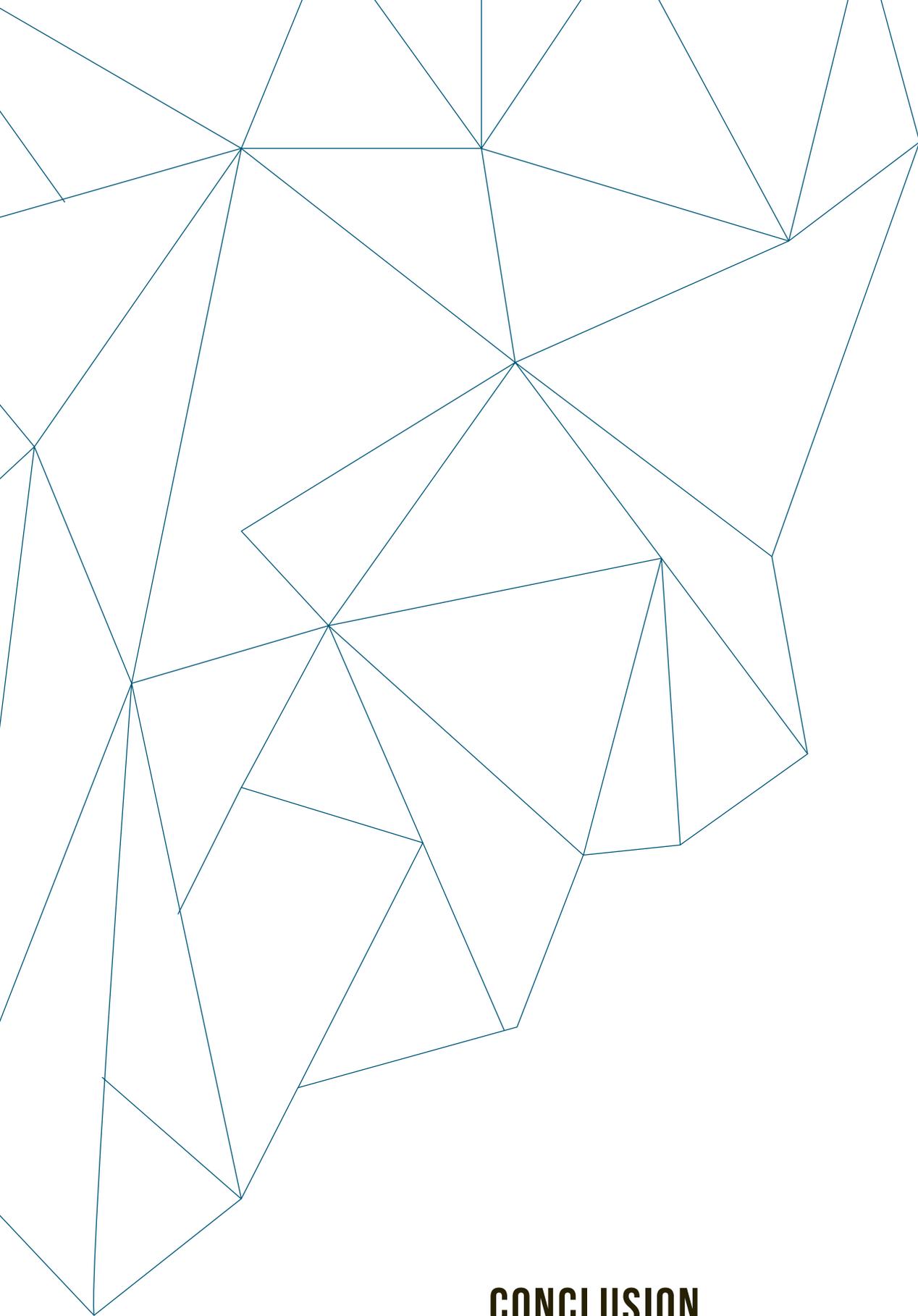
We recommend the creation of a Temporary Accommodation Board in each local authority area, ensuring UTA would no longer operate outside the purview of relevant agencies and stakeholders.

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Conclusion

It is absolutely vital that when making policy and practice decisions for ending homelessness that the full scope and scale of the issue is understood. The MHCLG has been criticised for the lack of accuracy in their statistics (NAO 2017, PAC 2017) and large strides have been made towards a more accurate understanding of homeless population by Crisis (Bramley 2017). However, the scale revealed in this report of hidden homeless households in UTA highlights that there needs to be even more vigilance in truly understanding the full picture of homelessness in England. **Recognition** of UTA residents as homeless and improved **recording** of type of tenure would improve our collective understanding of the homelessness system. This is especially true now with increased focus from the Government (they have committed to halve rough sleeping by 2022 and eliminate it by 2027, MHCLG 2017), politicians (Greater Manchester Mayor Andy Burnham and London Mayor Sadiq Khan have both made commitments to end rough sleeping, Lobb 2017) and charities (Crisis' commitment to create a 'plan to end homelessness', Crisis 2017) to push for ending homelessness. In addition, **remuneration** for private B&Bs exempt from UC would ensure landlords are happier with a guarantee their income will not decrease and improved **regulation** of B&Bs through the creation of Temporary Accommodation Boards will only lead to better and safer experiences for all those stuck living in UTA.



CONCLUSION

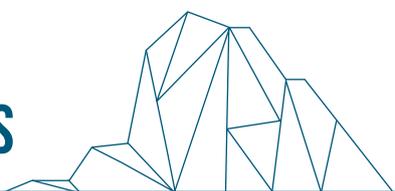
CONCLUSION

The homelessness crisis in England is worsening. Year on year the numbers of rough sleepers appear to be multiplying before our eyes as we walk down our streets. Numbers published in government statistical reports indicate a similar truth in every aspect of homelessness. This report has uncovered that in the midst of these worsening statistics and better attempts at defining and quantifying homelessness, that tens of thousands of vulnerable people are still missing from the statistics and hidden from view.

We believe an estimated 51,500 homeless households are both lost and forgotten in UTA and the truth of this reality is one of poor, unsafe conditions, a lack of support, insecurity in the accommodation and of little hope for anything better. The unimaginable life so many live in this accommodation requires those in positions of power to no longer ignore them, but to include them in plans for ending homelessness. This new analysis provides the statistical knowledge needed for policy, legislative and best practice implementation and our recommendations highlight exactly what action should be taken. Most importantly, every household in B&Bs should be recognised as homeless as they do not have access to safe, secure and settled accommodation.

It has been twenty years since the first report of this kind. The damning nature of the statistics published in this report today is that it highlights little has changed in that time. There are still almost ten times the official government figures living in unsupported temporary accommodation. The experience of poor conditions and insecurity has also not changed much in this time either. Our hope is that when another twenty years has passed, we will not be having the same conversation yet again.

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APPENDIX ONE

FREEDOM OF INFORMATION REQUEST LETTER



This request, through the Freedom of Information Act of 2000, is looking to collect the number of individuals living in unsupported temporary accommodation from 2010-2016. In order to assess this, I am requesting the following information:

1. **Private tenants claiming housing benefit from a Bed and Breakfast and/or all other accommodation with board and lodgings**
 - a. This information broken down by financial year (1st April – 31st March), i.e. the above number in 2010/2011; 2011/2012; 2012/2013; 2013/2014; 2014/2015; 2015/2016

AND

2. **Private tenants claiming housing benefit from a Bed and Breakfast and/or all other accommodation with board and lodgings (as described above) on 1st January in each of the above years.**

APPENDIX TWO

NOTE ON METHODOLOGY AND DATA



In order to use the Rural-Urban classification for local authority districts (RUCLAD) methodology we needed to re-order all our freedom of information request responses according to the categories set out in RUCLAD:

- Largely Rural
- Mainly Rural
- Urban with City and Town
- Urban with Minor Conurbation
- Urban with Major Conurbation
- Urban with Significant Rural

The classifications of local authorities can be found, alongside other documentation regarding RUCLAD at gov.uk:

<https://www.gov.uk/government/statistics/2011-rural-urban-classification-of-local-authority-and-other-higher-level-geographies-for-statistical-purposes>

Once all 326 local authorities and their responses to our freedom of information request were categorised into the RUCLAD classifications, we worked out the average population per category from the useable data we had (there was an average of 68.9% of useable data per English Region) and assumed the average population for that RUCLAD classification was the B&B population in gaps in our data.

We replicated this process for each of the RUCLAD classifications and for every financial year for which we received responses (2010/11; 2011/12; 2012/13; 2013/14; 2014/15; 2015/16) in order to determine population estimates for every financial year.

RUCLAD Category	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16
Largely Rural (41 LAs)	2,928.67	2,674.09	2,877.38	2,877.38	2,227.84	1,903.18
Mainly Rural (50 LAs)	2,999	3,315.54	3,408.09	3,408.09	4,107.5	3,530.46
Urban with City and Town (97 LAs)	17,813.53	16,115.70	17,573.2	17,573.2	17,643.19	16,651.08
Urban with Major Conurbation (75 LAs)	19,781	20,984.96	20,585.92	20,585.92	19,496.15	18,086.28
Urban with Minor Conurbation (9 LAs)	1,363.26	1,447.3	1,638.88	1,638.88	1,559.58	1,690.08
Urban with Significant Rural (54 LAs)	6,440.64	6,690.55	5,491.65	5,491.65	7,119.9	6,829.98
Total	51,326.35	51,228.14	51,575.12	52,419.9	52,154.16	48,691.06

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NOTE ON METHODOLOGY AND DATA

Once the above process was completed we then organised each local authority according to region in order to discover the estimated population for each region in each of the financial years listed above. The table below shows the regional breakdown of data per financial year.

Once all 326 local authorities and their responses to our freedom of information request were categorised into the RUCLAD classifications, we were then worked out the average population per classification and assumed that was the population of the areas that did not give us information regarding their B&B populations.

Region	2015/16	2014/15	2013/14	2012/13	2011/12	2010/11
South West	5128.425	4941.63	5277.58	5708.33	5941.565	5024.84
North East	1830.21	2277.79	2484.23	2443.36	2681.004	2389.51
South East	9290.155	8863.8	8486.26	9289.335	8864.012	8404.32
London	9126.75	9952.09	9729.13	8951.96	9383.65	8458.78
North West	7785.62	8007.02	8042.67	7945.8	7287.077	7636.19
East of England	5966.735	5377.38	5358.88	5099.495	5158.368	4917.45
West Midlands	3913.505	4262.82	4295.43	4454.045	4411.034	4152.4
Yorkshire and Humber	3992.265	3769.51	3231.77	4170.195	4047.4	3796.27
East Midlands	4247.215	4161.28	4153	4441.98	4116.058	4120.78

If there are any additional questions about our methodology or you would like to access our data in more detail, please do not hesitate to contact Justlife: info@justlife.org.uk



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